

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

COMMON CAUSE, *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER,

*Defendant.*

Case No. 1:22-CV-00090-ELB-SCJ-  
SDG

**THREE-JUDGE COURT**

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**PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

**INTRODUCTION**

Defendant's motion for summary judgment ("Mot.")<sup>1</sup> ignores facts supporting Plaintiffs' claims, mischaracterizes others, and improperly seeks to elevate the nonmovants' burden at the summary judgment stage. The simple truth is that, following discovery, a myriad of facts supports Plaintiffs' racial gerrymandering claims. Thus, summary judgment is starkly inappropriate.

To obtain summary judgment dismissing Plaintiffs' claims, Defendant bears the heavy burden of showing that there is not a single "genuine dispute as to any material fact." *See* Fed. R. Civ. P. 56(c). On its face, however, Defendant's motion reveals a multitude of factual disputes, including the intent of the Georgia legislature. Each of those factual disputes independently mandates denial of summary judgment and a prompt trial on Plaintiffs' racial gerrymandering claims. *See cf. Harlow v. Fitzgerald*, 457 U.S. 800, 816 (1982).

Unable to attack Plaintiffs' claims on the merits, Defendant first challenges the standing of Plaintiffs Common Cause and the League of Women Voters of Georgia ("League" and collectively, "Organizational Plaintiffs") by asserting without support, that they do not have organizational standing. And contrary to binding precedent from the Supreme Court and the Eleventh Circuit, Defendant also argues that the Organizational Plaintiffs do not have associational standing derived

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<sup>1</sup> All terms not herein defined have the meaning ascribed to them in the Declaration of Cassandra Nicole Love-Olivo in Opposition to Defendant's Motion for Summary Judgment ("Love Decl."), filed concurrently herewith.

from their membership.<sup>2</sup> Defendant’s standing arguments fail.

Second, faced with the considerable evidence Plaintiffs have amassed showing race predominated over traditional redistricting principles, Defendant responds that Plaintiffs’ evidence is not “conclusive.” But that is not the standard. Defendant can obtain summary judgment *only* by showing that there is *no* evidence supporting a finding or inference that race predominated. To top it off, Defendant offers a patently false explanation for the race-based decisions that shape the boundaries of Congressional Districts (“CD”) 6, 13, and 14—the districts Plaintiffs challenge (“Challenged Districts”): he asserts that the legislature was motivated by partisanship, not race. While the actual evidence disproves this theory, all the instant motion requires for denial is that there is *one* material factual dispute on that issue.

### **FACTUAL BACKGROUND**

The enacted congressional district plan, SB 2EX, was publicly introduced on November 17, 2021, mere hours before the Senate Committee on Reapportionment and Redistricting (“Senate Committee”) and House Legislative and Congressional Reapportionment Committee (“House Committee,” collectively, “Redistricting Committees”) held meetings, ostensibly to receive public feedback. SMF<sup>3</sup> ¶ 1. Over the next five days, the General Assembly rushed SB 2EX through the approval process. *Id.* ¶ 2. The Senate Committee voted favorably on it the next day, despite

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<sup>2</sup> Defendant does not challenge the standing of plaintiffs Dr. Cheryl Graves, Dr. Ursula Thomas, Jasmine Bowles, Dr. H. Benjamin Williams, and Brianne Perkins. These plaintiffs collectively have standing to challenge CD 6, CD 13, and CD 14, the three districts at issue in this case.

<sup>3</sup> All references to “SMF” indicate the Plaintiffs’ Separate Statement of Undisputed Material Facts, filed concurrently herewith.

unanimous opposition from Black committee members; and the Senate passed it the following day, despite unanimous opposition from Black senators. *Id.* ¶¶ 2, 3. The House Committee voted favorably on SB 2EX on November 20, 2021, despite unanimous opposition from Black committee members; and the House passed it the following business day. SMF ¶¶ 2, 3.

Despite “failing to make time for public comment after maps were published at the last minute,” SMF ¶ 5 (Ex. 8, Bagley Rpt. 86), many Georgians attended Redistricting Committee meetings to denounce the changes to CD 6, CD 13, and CD 14 because they failed to respect communities of interest.<sup>4</sup> SMF ¶ 5. Georgians testified that SB 2EX split communities of interest by removing certain precincts and adding others that had “absolutely nothing” in common with the remainder of the district, and combining urban and rural areas with diverging interests. SMF ¶ 5. Despite this harsh public criticism, members of the majority party did not evaluate any changes to the district boundaries. SMF ¶ 6.

Prior to introducing SB 2EX, the Redistricting Committees adopted guidelines for their map drafting, including “constitutional requirements of equal protection, compliance with the Voting Rights Act, [] a recognition of racially polarized voting, [] the importance of jurisdictional boundaries, prioritizing communities of interest, compactness, and continuity,” (“Guidelines”). SMF ¶ 7.

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<sup>4</sup> Three meetings on November 17, 18, and 20 were the only opportunity to voice public opposition to SB 2EX. SMF ¶ 1. The only prior opportunities to speak to Redistricting Committee members were town halls held between June 15 and August 11, 2021, before the release of census data or any proposed maps. SMF ¶ 4. As a result, comments at these town halls were necessarily nonspecific, with citizens unable to provide input on any proposed maps or propose their own.

These guidelines did not include the pursuit of partisan advantage. SMF ¶ 8.

But the Redistricting Committee failed to adhere to its own guidelines, making overtly race conscious moves that diminish minority voting power in the state. Including public release and discovery in this case, the majority party produced only a single draft congressional map. SMF ¶ 9-10. That is because Director Wright drew all three maps, keeping them private, and overriding prior drafts each time she saved her progress.<sup>5</sup> SMF ¶¶ 10, 12. This choice was intentional—on the heels of a 2018 three-judge panel in this District concluding there was “compelling” evidence that “race predominated th[e] redistricting process,” *see Ga. State Conference of NAACP v. Georgia*, 312 F. Supp. 3d 1357, 1365 (N.D. Ga. 2018), Director Wright expected litigation to ensue over the 2020 redistricting process, and thus kept communications unwritten, and intentionally saved over and thereby destroyed draft maps, in a misguided attempt to evade judicial scrutiny. SMF ¶¶ 10, 12 (Ex. 15, Wright Dep. 19:16-20:4).

Director Wright held meetings with members of the majority party to discuss changes to the map, which were input into the Reapportionment Office’s redistricting software. SMF ¶ 14. During these meetings, racial data was projected onto the computer screens where the map lines were being drawn such that legislators could immediately see how boundary changes impacted the racial balance of districts. *Id.*

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<sup>5</sup> Counsel for the subpoenaed Reapportionment Office and its director, the Redistricting Committees and their chairs, and other state legislators has represented none of these draft maps was saved or is recoverable. SMF ¶10.

There were better alternatives to the race conscious moves that the legislature made in its enacted SB 2EX. Both a congressional plan released by Senate Redistricting Committee Chair John Kennedy (“Kennedy-Duncan Plan”), as well as an alternative map set forth by Dr. Duchin, offer choices that adhere better to the Redistricting Committees’ Guidelines. SMF ¶¶ 9, 56-64. Moreover, Dr. Duchin’s analysis of 100,000 possible maps (that would be at least as effective in achieving the majority party’s political success as SB 2EX) show that the enacted maps are still outliers in terms of their racial composition—a telltale sign that the boundaries were uniquely and intentionally drawn to reach this end. SMF ¶¶ 65-67. The legislature chose to enact the current congressional map, packing and cracking minority voters in the Challenged Districts.

## **ARGUMENT**

### **I. ORGANIZATIONAL PLAINTIFFS HAVE STANDING TO BRING THEIR RACIAL GERRYMANDERING CLAIMS**

An organization has standing to assert racial gerrymandering claims when it demonstrates either associational or organizational standing, either one of which is independently sufficient. *See, e.g., Arcia v. Fla. Sec’y of State*, 772 F.3d 1335, 1341 (11th Cir. 2014); *Petteway v. Galveston Cnty.*, 2023 WL 2782705, at \*5 (S.D. Tex. Mar. 30, 2023). Common Cause and the League have both.

#### **A. Organizational Plaintiffs Satisfy Associational Standing**

Associational standing exists when the members of the organization “would have standing to sue in their own right, the interests at stake are germane to the organization’s purpose, and neither the claim asserted nor the relief requested



requires individual[] members’ participation in the lawsuit.” *Ala. Legislative Black Caucus v. Alabama* (“ALBC”), 575 U.S. 254, 269 (2015) (cleaned up). For redistricting claims, the Supreme Court recognizes that “a member of an association would have standing to sue in his or her own right when that member resides in the district that he alleges was the product of racial gerrymander.” *Id.* (quotations omitted); *see also United States v. Hays*, 515 U.S. 737, 744–45 (1995).

Defendant does not dispute the latter two prongs, nor could he. Both Organizational Plaintiffs’ mission statements reflect that they intend to protect and safeguard voting. *See* SMF ¶¶ 15, 16 (Ex. 19, Dennis Dep. 83:9-16; Ex. 22, Bolen Dep. 47:1-4). And it is well-settled that redistricting cases, like this one, may “proceed[] without the participation of individual members.” *Perez v. Abbott*, 267 F. Supp. 3d 750, 773 (W.D. Tex. 2017), *aff’d in part, rev’d in part and remanded on other grounds*, 138 S. Ct. 2305 (2018); *McConchie v. Scholz*, 567 F. Supp. 3d 861, 882 (N.D. Ill. 2021); *Ass’n of Am. Physicians & Surgeons, Inc. v. Tex. Med. Bd.*, 627 F. 3d 547, 551–53 (5th Cir. 2021). Instead, Defendant challenges only the first prong, contending that the Organizational Plaintiffs have not “put forth specific facts supported by evidence” establishing that each has members in each Challenged District. Mot. 8. In so doing, Defendant ignores the documentary record and misconstrues the evidence before this Court.

Here, both Common Cause and the League have numerous—in most cases, hundreds—of members in the Challenged Districts. Common Cause, for instance, has over 26,000 members in Georgia. *See* SMF ¶ 17 (Ex. 20, Dennis Decl. ¶ 2; Ex.

19, Dennis Dep. 93:15-16). This includes at least 760 members in CD 6; 140 members in CD 13; and 840 members in CD 14. *Id.* (Ex. 20, Dennis Decl. ¶¶ 3-5). Common Cause determined the residency of its members via the addresses members provided when they “elect[ed] to become members of” Common Cause. *Id.* ¶¶ 18-19 (Dennis Dep. 101:22-102:11). Common Cause used ZIP codes that were “wholly within a[n] impacted district” to determine the number of impacted members. *Id.* ¶ 19 (Dennis Dep. 102:5-7).

Likewise, the League keeps “a roster of all the places where [its over 549] members live.” SMF ¶ 23 (Ex. 23, Bolen Decl. ¶¶ 4, 9; Ex. 22, Bolen Dep. 39:3-6). The League used its “membership roster to look at . . . ZIP codes that were part of the three disputed districts.” *Id.* (Ex. 22, Bolen Dep. 59:2-4). Where congressional districts split ZIP codes, the League went “further to make sure the member’s address was indeed in the district.” *Id.* (Ex. 22, Bolen Dep. 59:4-6). Based on its analysis, the League confirmed that it “ha[s] members in every district.” *Id.* ¶ 24 (Bolen Dep. 59:9). The League has 23 members in CD 6; 22 members in CD 13; and 56 members in CD 14. *Id.* ¶ (Ex. 23, Bolen Decl. ¶¶ 5-7).<sup>6</sup>

Contrary to Defendant’s assertion that the Organizational Plaintiffs have “never identified any individual . . . that might provide the requisite evidence to show” associational standing, the deposition testimony of the Organizational

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<sup>6</sup> In arguing that the League “could not state if it was sure if there were any current members in any of the challenged districts,” Defendant grossly mischaracterizes the record. The League repeatedly affirmed in its deposition that “[they] have members in every district.” SMF ¶ 24 (Ex. 22, Bolen Dep. 59:9-12). Despite Defendant’s baseless assertions, see Mot. 9, nowhere did the League testify that it is unsure whether it has members in each Challenged District.

Plaintiffs, combined with declarations in support, demonstrate that both organizations have members in each Challenged District. Because residency is all that is required for an individual to have standing, and associational standing exists when the members “have standing to sue in their own right,” the Organizational Plaintiffs have standing here. *See ALBC*, 575 U.S. at 269 (cleaned up).

To avoid this inescapable conclusion, Defendant argues that associational standing requires the identification of particular members’ *names* and that Plaintiffs did not provide any specific names in discovery. Organizational Plaintiffs properly objected to Defendants’ intrusive and overbroad discovery requests, including on grounds of associational privilege,<sup>7</sup> but following the Organizational Plaintiffs’ testimony that each had numerous members in all three Challenged Districts, Defendants never pursued or sought to compel further discovery as to specific identities. Defendant’s assertion that specific members must be *named* is contrary to both Supreme Court and Eleventh Circuit precedent. In any event, each Organizational Plaintiff has identified members in the Challenged Districts in their Declarations filed concurrently herewith.<sup>8</sup> SMF ¶¶ 17, 24 (Ex. 23, Bolen Decl. ¶¶

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<sup>7</sup> The Organizational Plaintiffs objected to identification of their members based on the associational privilege because disclosure would chill associational rights for fear of retaliation. SMF ¶¶ 20, 25. Defendant did not challenge that objection.

<sup>8</sup> In an abundance of caution and to aid in judicial efficiency, each Organizational Plaintiff has submitted a declaration, which identifies members that continue to suffer harm because of Defendant’s unconstitutional racial gerrymandering. Having failed to pursue the identity of individual members of the organizations, Defendant cannot object that a few specific individuals were identified out of the many members who live in the Challenged Districts in response to Defendant’s Motion. Given the minimal threshold for associational standing—just one identified member—Defendant certainly is not prejudiced by the identification of specific

21-24; Ex. 20, Dennis Decl. ¶¶ 17, 19).<sup>9</sup>

The Supreme Court has recognized that an organization meets the burden of establishing standing to challenge particular voting districts when it produces evidence that it is “a statewide organization with members in almost every county.” *ALBC*, 575 U.S. at 270 (quotations omitted); *see also Ohio A. Philip Randolph Inst. V. Householder*, 367 F. Supp. 3d 697, 731 (S.D. Ohio 2019). Both Organizational Plaintiffs easily clear that hurdle here.

In *ALBC*, a racial gerrymandering challenge, the Court overturned the district court’s decision of no standing where it produced evidence much weaker than Plaintiffs here have provided. *ALBC*, 575 U.S. at 271.<sup>10</sup> Like the *ALBC* plaintiff, Organizational Plaintiffs testified about how redistricting and voting are a part of their core purpose. The *ALBC* plaintiff testified it had members in *almost* every Alabama county, but not necessarily every state legislative district because many counties were split into several districts, *id.* at 269-71. Here, by contrast,

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members by each organization six months before trial. *See Clapper v. Amnesty Int’l USA*, 568 U.S. 398, 411-12 (2013) (stating that a party invoking federal jurisdiction can, and should, establish standing “by affidavit or other evidence” at the summary judgment stage) (citing *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 561 (1992)).

<sup>9</sup> Common Cause has identified members from CD 13, and is in the process of obtaining consent to provide one of those names and addresses to the Court. Common Cause will supplement the record if needed, once consent is obtained.

<sup>10</sup> Further, the *ALBC* court noted that before trial, defendants are only entitled to the associational standing discovery and evidence they specifically pursue. *ALBC*, 575 U.S. at 270-271 (“[I]n the absence of a state challenge or a court request for more detailed information, it need not provide additional information such as a specific membership list.” (emphasis added)). But Defendant here failed to seek the information he now argues he must be provided.

Organizational Plaintiffs provided much more specific testimony—the existence of members in each and every Challenged District, as well as the methodology for identifying those members. The *ALBC* court found the evidence there “support[ed] an inference that the organization has members in all of the State’s majority-minority districts” and thus plaintiff had standing to sue. *Id.* at 270. *A fortiori*, Organizational Plaintiffs have associational standing here.

The Eleventh Circuit is in accord. *See Fla. State Conf. of N.A.A.C.P. v. Browning* (“*Browning*”), 522 F.3d 1153, 1161 (11th Cir. 2008) (recognizing that the Circuit does not “require[] that the organizational plaintiffs name names” where the harm is prospective); *see also Doe v. Stincer*, 175 F.3d 879, 882, 884 (11th Cir. 1999) (ruling that the Circuit “h[as] never held that a party suing as a representative must specifically name the individual on whose behalf the suit is brought”). In *Browning*, the NAACP sought a preliminary injunction barring enforcement of a Florida voter registration statute. The defendant argued that the failure to name specific members was fatal to establishing associational standing. *Browning*, 522 F.3d at 1163. The Eleventh Circuit disagreed, holding that “all that plaintiffs need to establish is that at least one member faces a realistic danger” of suffering the injury for which the organization seeks relief. *Id.*

Here, too, because Common Cause and the League “collectively claim around [27,000] members state-wide, it is highly unlikely . . . that not a single member” resides in each challenged district; the injury from which Common Cause and the League seek relief “does not depend on conjecture.” *Id.* As a result, the Circuit does

“not require[] that the organizational plaintiffs *name names*” to establish associational standing. *Id.* at 1161 (emphasis added).<sup>11</sup>

Both Common Cause and the League have “put forth specific facts supported by evidence.” In fact, both organizations have put forth evidence detailing that “specific member[s] will be injured” because each organization has at least one member that resides in each Challenged District, which is the very standard Defendant concedes satisfies associational standing. Mot. 8; *see also Hays*, 515 U.S. at 744–45 (affirming that an individual has standing to challenge racial gerrymandering when that individual “resides in a racially gerrymandered district”). Nothing more is required.

#### **B. Organizational Plaintiffs Satisfy Direct Organizational Standing**

To establish organizational standing, a plaintiff must demonstrate a “concrete and demonstrable injury to the organization’s activities,” such as a “drain on the organization’s resources” or “perceptibl[e] impair[ment]” of the organization’s ability to fulfill its mission. *Havens Realty Corp.*, 455 U.S. at 378–79. In the Eleventh Circuit, “an organization has standing to sue [] when a defendant’s illegal acts impair the organization’s ability to engage in its own projects by forcing the organization to divert resources in response,” including personnel and time. *Arcia*, 772 F.3d at

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<sup>11</sup> Defendant’s sole supporting authority, *Georgia Republican Party v. Sec. & Exch. Comm’n*, which affirms *Browning*, is inapposite. There, the organization challenged a political contribution and solicitation rule, wholly different from the claims here. 888 F.3d 1198, 1200 (11th Cir. 2018). The Eleventh Circuit in that case rejected the organization’s standing not because the organization failed to “name names,” but because the plaintiff failed to include any evidence that any of its membership was injured by the challenged rule. *Id.* at 1204.

1341; *Common Cause/Georgia v. Billups*, 554 F.3d 1340, 1350 (11th Cir. 2009); *Browning*, 522 F.3d at 1165-66.

As a threshold matter, Defendant appears to argue that organizational standing is simply unavailable in redistricting cases. Defendant does not cite any authority for that sweeping proposition, because there is none.<sup>12</sup> Rather, “[a]n organization may show injury-in-fact in two ways,” either through associational or organizational standing. *Petteway*, 2023 WL 2782705, \*5. Both the United States Supreme Court and the Eleventh Circuit recognize that an organization may have standing via diversion of resources. *See, e.g., Havens Realty Corp. v. Coleman*, 455 U.S. 363, 379 (11th Cir. 1982); *Arcia*, 772 F.3d at 1341-42.

Despite the absence of any contrary authority, Defendant asks this Court to carve out an exception to the rule, even though no court has rejected the availability of organizational standing based on diversion of resources. *Perez*, 267 F. Supp. 3d at 772. Rather, “courts have consistently found standing under *Havens* for organizations to challenge alleged violations of § 2 of the VRA and the Fourteenth Amendment.” *Id.* at 771-772; *see also Crawford v. Marion Cnty. Election Bd.*, 472

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<sup>12</sup> The Eleventh Circuit’s recent decision in *City of S. Miami v. Gov. of Fl.*, is distinguishable. 2023 WL 2925180 (11th Cir. Apr. 13, 2023). That case dealt with organizational standing in the context of a challenge to a Florida law mandating law enforcement agencies cooperate with federal authorities in the enforcement of immigration laws. The court held that the organizational plaintiffs’ injury was no more than “highly speculative fear” and without an injury-in-fact, diversion of resources was insufficient to establish standing. *Id.* at \*3. Here, the Organizational Plaintiffs’ injuries, and that of their members, are far from speculative—they are certain, current, and ongoing, as the Supreme Court has previously found. *See, e.g., ALBC*, 575 U.S. at 269. Defendant does not contest this.



F.3d 949, 951 (7th Cir. 2007), *aff'd*, 553 U.S. 181 (2008). Accordingly, there is no basis to deny the Organizational Plaintiffs' organizational standing.

Beyond Defendant's unfounded assertion that organizational standing does not exist, he does not appear to dispute that the Organizational Plaintiffs have diverted resources. To be sure, Organizational Plaintiffs had to divert personnel, time, and resources from their usual activities and, as a result, were prevented from engaging in their own projects. SMF ¶¶ 29-39. Common Cause diverted resources to educate its membership and community about the maps both prior to and after enactment, "increas[ing its] efforts to do more direct communications with [its members and community], and . . . creating more channels to be able to build resources for [its] coalition partners." SMF ¶¶ 29-31. (Ex. 19, Dennis Dep. 49:24-50:3). As a result of its need for "more manpower...to do [its] programmatic work," the organization was forced "to hire more staff members" focused on redistricting after map enactment. *Id.* ¶ 31 (Ex. 19, Dennis Dep. 48:7, 9-13, 18-21, 49:1-6). Likewise, the League expended resources to combat Georgia's illegal redistricting. SMF ¶ 32. The League conducted "door knocking . . . talked to people and left information about redistricting." ¶ 33. (Ex. 22, Bolen Dep. 24:22-25:25). Recognizing an unprecedented "gap of knowledge" among its membership, they focused on "engag[ing] the public and work[ing] with partner organizations [to] get information out and encourage people to express their opinions to their legislators and committees," and continued to provide information to the many received "calls about people being confused about what district they were in, where they went to



vote, and [more].” ¶¶ 34-35. (Ex. 22, Bolen Dep. 40:19-41:5). Accordingly, “[t]his redirection of resources to counteract” the legislature’s adoption of SB2EX “is a concrete and demonstrable injury.” *Arcia*, 772 F.3d at 1342 (citation omitted).

As a result of their diversion, both were also prevented from engaging in their usual “projects” and “regular activities.” *Common Cause/Georgia*, 554 F.3d at 1350. Had SB 2EX not forced Common Cause to divert its resources, Common Cause “typically [] would have more conversations with election boards [and] election officers” regarding the municipal election and would have “buil[t] out more resources to educate voters regarding the changes with SB202 . . .,” “doing more work with understanding . . . the chain of command with [its] local law enforcement regarding Georgia elections . . . [and] voting security.” SMF ¶¶ 36-37 (Ex. 19, Dennis Dep. 52:21-25). Common Cause also “wanted to work with community members . . . to do further education” regarding a broadband accessibility initiative, but “w[as] not able to do so because [it] had to divert attention to redistricting efforts.” *Id.* (Ex. 19, Dennis Dep. 54:3-13). It was also unable to conduct “community engagement” regarding eminent domain procedures, and though it does “direct member engagement,” including “boot camp[s]”, it was only able to complete its legislative preview. *Id.* (Ex. 19, Dennis Dep. 55:24-56:7, 59:11-25). Lastly, Common Cause also needed additional employees, but lacked the time and personnel “to complete interviews.” *Id.* (Ex. 19, Dennis Dep. 57:8-17, 58:2-18).

Similarly, the League was prevented from conducting its voting education and registration work—a core function for the League. The League also testified about

its inability to continue its “[n]ormal[]” work, including “trying to . . . register voters and educate them about voting.” *Id.* ¶ 38 (Ex. 22, Bolen Dep. 33:10-24). Especially in light of the what the League normally would have done surrounding SB 202, which “dramatically changed Georgia’s voting laws,” it was unable to complete its education and other initiatives to aid the voting ability of its membership and community because of the redistricting process. *Id.* (Ex. 22, Bolen Dep. 33:6-24). And while the League usually spends time partnering with Georgia high schools and colleges to educate students on the importance of voting, it was unable to because of the new map. Typically, the League ensures that “as people become old enough to vote, th[e League] help[s] them register and[] get comfortable with the voting process.” But because of SB 2EX, the League was unable to “push forward with [that initiative].” *Id.* ¶ 39 (Ex. 22, Bolen Dep. 73:8-20).

In sum, “an organization suffers an injury in fact when a statute ‘compels’ it to divert more resources” away from its goals. Here, Organizational Plaintiffs were unable to conduct the outreach, education, and hiring they had otherwise intended as a result of “divert[ing] resources to counteract” SB2EX. *Browning*, 522 F.3d at 1165. Common Cause and the League, therefore, have organizational standing based on a diversion of resources to assert their claims of racial gerrymandering.

## **II. MYRIAD MATERIAL FACTUAL DISPUTES PRECLUDE SUMMARY JUDGMENT**

### **A. Defendant Misstates His Burden on Summary Judgment**

For summary judgment, Defendant must show that “there is no genuine dispute as to any material fact” and he is “entitled to judgment as a matter of law.”

Fed. R. Civ. P. 56(c). In order to “discharge[] its burden,” Defendant must show “there is an absence of evidence to support the non-moving party’s case.” *Jeffery v. Sarasota White Sox, Inc.*, 64 F.3d 590, 593 (11th Cir. 1995) (citation omitted). “The evidence of the non-movant is to be believed, and all justifiable inferences are to be drawn in his favor.” *Allen v. Tyson Foods, Inc.* 121 F.3d 642, 646 (11th Cir. 1997) (quotation omitted). “At the summary judgment stage, however, the non-moving party is not required to produce ‘conclusive’ evidence.” *Cf. Cloverland-Green Spring Dairies, Inc. v. Penn. Milk Mktg. Bd.*, 298 F.3d 201, 217 (3d Cir. 2002); *see also Est. of Serrano v. New Prime, Inc.*, 2013 WL 2637023, \*4 (N.D. Ga. June 12, 2013). Defendant’s demand for Plaintiffs to provide evidence that is, in his opinion, “conclusive,” flips the summary judgment standard on its head.

To secure summary judgment, it is the *Defendant*—not Plaintiffs—who must bring forth *conclusive* evidence. *See, e.g., Scott Paper Co. v. Adair Truck & Equip. Co.*, 542 F.2d 1257, 1260 (5th Cir. 1976) (denying summary judgment because movant’s evidence of intent was not “conclusive”); *In re Fontainebleau Las Vegas Holdings, LLC*, 417 B.R. 651, 659 (S.D. Fla. 2009), *aff’d sub nom. Ave. CLO Fund Ltd. v. Bank of Am., NA*, 709 F.3d 1072 (11th Cir. 2013); *Flowers Bakeries Brands, Inc. v. Interstate Bakeries Corp.*, 2010 WL 2662720, \*7 (N.D. Ga. June 30, 2010).

Instead, Defendant sets forth nothing conclusive—he simply asks this Court to weigh conflicting evidence and to make determinations on factual disputes at the summary judgment stage, a wholly inappropriate exercise. *See Wate v. Kubler*, 839 F.3d 1012, 1018 (11th Cir. 2016). But summary judgment is not a trial on the papers.

**B. Plaintiffs Have Set Forth Evidence Showing The Challenged Districts Are Racial Gerrymanders**

Plaintiffs have provided considerable evidence that the Challenged Districts are racially gerrymandered. Defendant does not really dispute this, instead arguing only that Plaintiffs’ evidence is “no[t] conclusive.” Mot. 14. But that is not the standard on summary judgment. “Defendants acknowledge that “circumstantial evidence of a district’s shape and demographics” can establish that a district was racially gerrymandered.” Mot. 10 (quoting *Miller v. Johnson*, 515 U.S. 900, 916 (1995)). To prove racial gerrymandering, Plaintiffs must show that “race was the predominant factor motivating the legislature’s decision to place a significant number of voters within or without a particular district.” *Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 187 (2017) (citation omitted). Such predomination is shown when “the legislature subordinate[s] traditional race-neutral districting principles to racial considerations.” *Id.* Those principles include: compactness; respect for political boundaries, *e.g.*, not splitting counties; respecting communities of interest defined by shared interests; incumbency; and retaining the cores of the prior districts. SMF ¶ 7. And “race may predominate even when a reapportionment plan respects traditional principles.” *Bethune-Hill*, 580 U.S. at 189.

As the Supreme Court has recognized, the assessment of motivation is a credibility determination that is particularly ill-suited for summary judgment. *See Hunt v. Cromartie*, 526 U.S. 541, 552-54 (1999) (reversing district court’s grant of summary judgment to plaintiffs on their racial gerrymandering claim); *Harlow v. Fitzgerald*, 457 U.S. 800, 816 (“questions of subjective intent so rarely can be

decided by summary judgment”). That is because “[t]he task of assessing a jurisdiction’s motivation . . . is an inherently complex endeavor, one requiring the trial court to perform a sensitive inquiry into such circumstantial and direct evidence of intent as may be available.” *Hunt*, 526 U.S. at 546 (quotation omitted).<sup>13</sup>

### **C. Race Predominated Over Traditional Redistricting Principles in Drawing the Challenged Districts**

As a factual matter, the evidence adduced through discovery overwhelmingly shows that race predominated over traditional redistricting principles here. Dr. Duchin analyzed the Challenged Districts’ adherence (or lack thereof) to traditional redistricting principles. SMF ¶ 40 (Ex. 24, Duchin Rpt. 67-80). She concluded that these principles were undermined resulting in “packing” and “cracking,”<sup>14</sup> in the Challenged Districts. *Id.* ¶¶ 41-42 (Ex. 24, Duchin Rpt. 4). Dr. Duchin further found that the Challenged Districts’ boundaries were infected with “acutely race-conscious moves,” *Id.* ¶ 43 (Ex. 24, Duchin Rpt. 4), including:

#### *Concerning CD 6*

- This district was “targeted to eliminate electoral opportunity,” “specifically by removing Black and Hispanic voters from CD 6 and replacing them with White suburban, exurban, and rural voters in Forsyth and Dawson counties.” “This [targeting] is corroborated by the core retention numbers that show that CD 6 was singled out for major reconfiguration.” *Id.* ¶¶ 44-45 (Ex. 24, Duchin Rpt. 4, 10).

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<sup>13</sup> In *Hunt*, a single expert affidavit, containing only circumstantial evidence of legislative motive was sufficient to create a factual dispute to overcome a summary judgment motion. *Id.*

<sup>14</sup> “Packing” and “cracking” are “the related practices of overconcentrating Black and Latino voters on one hand, or splitting communities and dispersing their voters over multiple districts on the other.” SMF ¶ 42 (Ex. 24, Duchin Rpt. 4).

- All of the CD 6 county splits are “consistent with an overall pattern of cracking in . . . CD 6.” *Id.* ¶ 46 (Ex. 24, Duchin Rpt. 73). These include: a lower BVAP and BHVAP<sup>15</sup> in the portions of Cherokee, Cobb, Fulton, and Gwinnett Counties assigned to CD 6 than to CD 5, CD 9, CD 11, CD 13, or CD 14. *Id.* ¶ 47.

*Concerning CD 13*

- “[R]ace-conscious county splitting” caused CD 13 to remain “highly packed.” *Id.* ¶¶ 48-49 (Ex. 24, Duchin Rpt. 5). The county splits are “consistent with an overall pattern of . . . packing in CD 13.” *Id.* (Ex. 24, Duchin Rpt. 73). These include: a higher BVAP and BHVAP in the portion of Cobb, Douglas, Fayette, Fulton, and Henry Counties assigned to CD 13 than to CD 3, CD 6, CD 7, CD 10, or CD 11. *Id.* ¶ 50.
- Cobb County’s population is within 0.1% of the ideal district size of 765,136 people, but the county is split into four congressional districts. *Id.* ¶ 51 (Ex. 24, Duchin Rpt. 22). Director Wright testified splitting counties “poses problems with elections.” *Id.* ¶ 52 (Ex. 15, Wright Dep. 119:6-9).

*Concerning CD 14*

- The changes to the district are “distinctive in terms of density and racial composition.” *Id.* ¶ 53 (Ex. 24, Duchin Rpt. 68). The district’s incursion into Cobb “can’t be justified in terms of compactness or respect for urban/rural communities of interest.” *Id.* ¶ 54.
- Community of interest narratives provided to the Redistricting Committees “make it clear that the changes to . . . CD 14 lack justification by community-of-interest reasoning.” *Id.* ¶ 55 (Ex. 24, Duchin Rpt. 80). Whereas residents of the core CD 14 in Northwest Georgia counties frequently used words identifying rural interests, residents of the newly-added Western Cobb County area frequently used words identifying urban ones. *Id.* (Ex. 24, Duchin Rpt. 79-80). The “record of strong pushback” demonstrates CD 14’s boundaries are dissonant in terms of shared community interests. *Id.* ¶ 56 (Ex. 24, Duchin Rpt. 5).
- The splitting of Cobb County is “consistent with . . . submerging a small

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<sup>15</sup> Dr. Duchin uses the abbreviation “BVAP” “to denote the share of voting age population that is Black alone or in combination”; and uses “BHVAP” “for the share...that is Black and/or Latino.” *Id.* (Ex. 24, Duchin Rpt. 81).

and diverse urban community in CD 14,” including a higher BVAP and BHVAP in the portion of Cobb County assigned to CD 14 than to CD 6 or CD 11. *Id.* ¶ 57 (Ex. 24, Duchin Rpt. 73).

Dr. Duchin also drew an alternative congressional plan that outperformed the adopted map on the traditional redistricting principles that the legislature claimed to follow, while not packing or cracking the Challenged Districts as the enacted plan does. Dr. Duchin’s alternative plan is more compact than the enacted plan, splits fewer counties, municipalities, and state precincts—and where there are splits, into fewer pieces. *Id.* ¶¶ 58-62 (Ex. 24, Duchin Rpt. 21-22). While more closely adhering to these traditional redistricting principles, Dr. Duchin’s alternative plan unpacks CD 13 (from 66.7% to 52.0% BVAP, 77.2% to 58.8% BHVAP); removes the cracked Black communities from CD 14 (reducing BVAP from 14.3% to 7.6%); raises the District 6 BVAP and BHVAP; and creates another minority opportunity district to replace the prior CD 6—which was the minority opportunity district that the State dismantled in the enacted plan. *Id.* (Ex. 24, Duchin Rpt. 25). Dr. Duchin’s illustration that it was possible to avoid packing and cracking Black and Latino voters while adhering better to traditional redistricting principles constitutes strong evidence that the legislature *chose* to pack and crack minority voters.

The Kennedy-Duncan Plan, introduced by Senate Redistricting Committee Chair John Kennedy prior to SB 2EX is also more compact than the enacted plan, splits fewer counties, municipalities, and state precincts, and splits those that are into fewer pieces. *Id.* ¶ 63 (Ex. 24, Duchin Rpt. 21-22). Senator Kennedy’s plan does not feature all of the “acutely race-conscious moves” present in the enacted SB 2EX,



including moving CD 6 up into Dawson County and submerging a heavily Black portion of Cobb County into CD 14. *Id.* ¶ 64. Senator Kennedy’s proposed plan—which was rejected by the legislature—proves the legislature had knowledge of a plan with less packing and cracking and better fulfillment of the legislature’s purported goals when they *chose* to enact the current one. This is further strong evidence of racial gerrymandering in the enacted plan.

Defendant criticizes Dr. Duchin’s core retention analysis for allegedly “not demonstrat[ing]” that certain redistricting principles were subjected to racial considerations, alleging she “did not analyze those traditional principles.” Mot., 15. Defendant simply misunderstands Dr. Duchin’s analysis. She did analyze each of these traditional redistricting principles in her report, SMF ¶¶ 40-41, 58 (Ex. 24, Duchin Rpt. 4, 5, 25, 67-80),<sup>16</sup> and found evidence of “racially imbalanced transfers of population” that were “emphatically not required by adherence to traditional districting principles.” *Id.* ¶ 65 (Ex. 24, Duchin Rpt. 67-69). These facts alone are more than sufficient to create a “genuine issue of material fact.”<sup>17</sup>

Regardless, Plaintiffs are not required to contest the application of every single traditional redistricting principle to survive summary judgment. Defendant’s criticisms are nothing more than an attempt to minimize the weight and credibility of Plaintiffs’ evidence, which is impermissible at the summary judgment stage. *See*

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<sup>16</sup> Dr. Duchin notes that all of the plans under consideration are contiguous.

<sup>17</sup> Defendant also incorrectly argues that summary judgment is appropriate because Dr. Duchin did not say “that the various metrics she reviewed showed racial predominance.” *See* Mot., 14; Def.’s SMF, ¶ 47. But the ultimate question of legislative motivation is for the factfinder to determine. Dr. Duchin provides ample evidentiary support for the conclusion that the legislature was racially motivated.



*Miller*, 515 U.S. at 916 (race-neutral redistricting principles “inform the plaintiff’s burden of proof *at trial*” (emphasis added)).

**D. A Race-Neutral, Partisan Motivation Does Not Explain the Challenged Districts’ Boundaries**

Faced with extensive evidence that racial considerations predominated over the legislature’s adherence to traditional redistricting principles, Defendant offers a competing explanation for the patent gerrymandering of the Challenged Districts: they are partisan gerrymanders, not racial gerrymanders. Mot. 11. This justification—which only highlights the parties’ factual disputes—is too little too late. At best, it highlights a factual dispute to be determined at trial. *See Williams v. Obstfeld*, 314 F.3d 1270, 1277 (11th Cir. 2002) (“[T]he existence of knowledge or intent is a question of fact for the factfinder, to be determined after trial.”); *Aronowitz v. Health-Chem Corp.*, 513 F.3d 1229, 1237 (11th Cir. 2008); *Rutherford v. Crosby*, 385 F.3d 1300, 1307 (11th Cir. 2004). Beyond that, the pursuit of partisan advantage is not one of the criteria the Redistricting Committees adopted to guide its work, and members of the majority party repeatedly insisted that they were motivated by adherence to traditional redistricting principles when drawing new maps. SMF ¶ 8.

Moreover, a race-neutral partisan explanation is belied by the boundaries of the Challenged Districts. Race predominated over partisanship, and partisan goals were achieved through the use of race. Such a use of racial data triggers strict scrutiny. *See Bush v. Vera*, 517 U.S. 952, 968 (1996) (affirming that where race is used as a proxy for politics, strict scrutiny applies). And once strict scrutiny is triggered, the burden lies with Defendant “to prove that its race-based sorting of

voters” satisfies that standard, serving a “compelling interest” that is “narrowly tailored.” *Cooper v. Harris*, 581 U.S. 285, 292 (2017) (quoting *Bethune-Hill*, 137 S. Ct. at 800-01). Defendant has not offered any evidence that their use of race was narrowly tailored, let alone proven so, to the exclusion of any material factual dispute.<sup>18</sup> Summary judgment based on Defendant’s alternative after-the-fact explanation of the gerrymander is wholly improper.

Indeed, Dr. Duchin found that the districts themselves do not support Defendant’s story that the legislature pursued solely partisan advantage. To test Defendant’s purported partisanship justification, Dr. Duchin generated 100,000 redistricting plans with an algorithm seeking electoral success for the Republican Party. *Id.* ¶ 66 (Ex. 27, Duchin Supp. Rpt. 7-8). The algorithm was designed to meet or exceed the partisan performance of the enacted congressional plan while respecting traditional redistricting principles. The resulting simulated plans showed that the districts enacted by the legislature are outliers in their racial composition.

Specifically, the middle range of districts in BVAP percentage—those most likely to be contested for political party control in an evenly split state—“show clear signs of ‘cracking’” in the enacted plan, relative to the comparison plans.” *Id.* ¶ 67 (Ex. 24, Duchin Rpt. 8). This is consistent with “a plan [] drawn by using minority racial population to secure partisan advantage in a state with roughly 50-50 partisan support.” *Id.* ¶ 68 (Ex. 24, Duchin Rpt. 8). Thus, as Dr. Duchin concludes, “This

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<sup>18</sup> See Mot., 11 (“...this Court need not reach the second question of whether the State had a compelling interest, such as compliance with the Voting Rights Act.”) (cleaned up). Because Defendant does not so assert, he cannot then properly claim that VRA compliance affords the State any “leeway.” See Mot., 14-15.

does not suggest a race-neutral pursuit of partisan advantage, but rather a highly race-conscious pursuit of partisan advantage.” *Id.* ¶ 69 (Ex. 24, Duchin Rpt. 8).

Precinct splits further belie the Defendant’s partisanship defense. Election results data is only available at the precinct level, not at smaller geographical units, such as census blocks. However, racial demographic data *is* available at the census-block level.<sup>19</sup> *See, e.g.*, SMF ¶ 70 (Ex. 28, Strangia Dep. 103:17-23). Race is highly correlated with political affiliation in Georgia. *See* SMF ¶ 71. Thus, mapmakers seeking partisan advantage may be tempted to use racial data as a proxy for partisanship, particularly where partisan data is unavailable.

For this reason, district boundaries that split state precincts and sort voters at the census-block level can be “especially revealing.” *Id.* ¶ 72 (Ex. 24, Duchin Rpt. 75). Because precincts are the units at which votes are cast and finer divisions are usually made by using demographics, splits to state precincts “highlight the predominance of race over even partisan concerns.” *Id.*<sup>20</sup> Dr. Duchin found that split precincts at the border of CD 6 “show significant racial disparity, consistent with an effort to diminish the electoral effectiveness of CD 6 for Black voters.” *Id.*

The dispute over the legislature’s intent in drawing the Challenged Districts is a factual one. Plaintiffs’ considerable evidence that race predominated over traditional redistricting principles creates a triable issue of material fact. Defendant’s

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<sup>19</sup> Census blocks are the smallest geographic units. Generally, precincts are comprised of multiple census blocks.

<sup>20</sup> Defendant’s contention that Dr. Duchin did not look at the political data behind precinct splits, Mot. 14, suggests that such data is available, when Defendant knows that it is not. SMF ¶ (Ex. 28, Strangia Dep. 95:8-22).

attempt to explain this evidence away in hindsight as partisan gerrymandering does nothing to negate that. In light of the complexity of the material factual and credibility determinations that must be made, summary judgment is inappropriate.

### CONCLUSION

For the reasons stated above, Plaintiffs respectfully request that this Court deny Defendant's Motion for Summary Judgment.

Dated this 26<sup>th</sup> day of April 2023.

Respectfully submitted,

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**NORTHERN DISTRICT OF GEORGIA LOCAL RULE 7.1**  
**CERTIFICATION**

Pursuant to N.D. Ga. L.R. 7.1(D), I, Jack Genberg, certify that this brief was prepared using Times New Roman 14 pt. font, which is one of the font and point selections approved by the Court in L.R. 5.1(B).

Dated this 26th day of April, 2023

Respectfully submitted,

/s/ Jack Genberg

Jack Genberg (Ga. Bar 144076)

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

COMMON CAUSE, *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER,

*Defendant.*

Case No. 1:22-CV-00090-ELB-SCJ-  
SDG

**THREE-JUDGE COURT**

**DECLARATION OF CASSANDRA NICOLE LOVE-OLIVO IN OPPOSITION TO  
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

I, Cassandra Nicole Love-Olivo, declare:

1. I am an attorney at law at Dechert LLP. I have been admitted *pro hac vice* to the United States District Court for the Northern District of Georgia and am counsel of record for Plaintiffs in the above-referenced action.

2. I submit this Declaration in Opposition to Defendant’s Motion for Summary Judgment, filed concurrently herewith. Unless otherwise stated, I have personal knowledge of the matters stated herein and would competently testify thereto if called upon as a witness.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a posting from the Legislative and Congressional Reapportionment Office (“LCRO”), titled

“Proposed Plans,” which is available online at <https://www.legis.ga.gov/joint-office/reapportionment>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the Nov. 17, 2021 Meeting Notes, labeled Bates Nos. LEGIS00002253-2333, which was produced in this litigation.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the Nov. 18, 2021 Meeting Notes, labeled Bates Nos. LEGIS00002334-2373, which was produced in this litigation.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the Nov. 20, 2021 Meeting Minutes, labeled Bates Nos. LEGIS00002374-2571, which was produced in this litigation.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a webpage from the Georgia General Assembly related to SB 2EX titled “Status History & Votes,” which is available online at <https://www.legis.ga.gov/legislation/60895>.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a webpage from the Georgia General Assembly titled “Passage, SB 2EX,” which is available online at <https://www.legis.ga.gov/legislation/60895>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of a document titled Minutes of the Senate Committee on Reapportionment and

Redistricting, which is available at <http://www.senate.ga.gov/committees/Documents/2021EXMinutes140.pdf>.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of the Expert Report of Joseph Bagley, Ph.D., dated January 13, 2023, which was served in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Bagley Rpt.”).

11. Attached hereto as **Exhibit 9** is a true and correct copy of a press release titled “House and Senate Reapportionment Committees to Hold Statewide Town Hall Hearings,” which is available online at <https://house-press.com/house-and-senate-reapportionment-committees-to-hold-statewide-town-hall-hearings>.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a press release from the Georgia Senate Press Office titled “House and Senate Reapportionment Committees to Hold Joint Virtual Town Hall Hearing,” labeled Bates Nos. LEGIS00000174-75, which was produced in this litigation.

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of the January 18, 2023 Deposition of Rep. Bonnie Rich, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia*,



*et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Rich Dep.”).<sup>1</sup>

14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts of the February 28, 2023 Deposition of Joseph Bagley, Ph.D., which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Bagley Dep.”).<sup>2</sup>

15. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts of the January 26, 2023 Deposition of Dir. Gina Wright, the Director of the Georgia General Assembly’s Legislative and Congressional Reapportionment Office, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Wright Dep.”).<sup>3</sup>

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<sup>1</sup> Pursuant to the Standing Orders of Judge Ross and Judge Jones, this transcript and others have already been filed in their entirety. Those full transcripts are cited herein where applicable. The full transcript of the Deposition of Rep. Bonnie Rich was filed on March 23, 2023, at ECF No. 85.

<sup>2</sup> The full transcript of the Deposition of Joseph Bagley, Ph.D. was filed on March 23, 2023, at ECF No. 82.

<sup>3</sup> The full transcript of the Deposition of Director Gina Wright was filed on March 23, 2023, at ECF No. 86.

16. Attached hereto as **Exhibit 14** is a true and correct copy of the Georgia District Map Information, labeled Bates Nos. LEGIS00003532-LEGIS00003537, which was produced in this litigation.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the 2021-2022 Guidelines for the House Legislative and Congressional Reapportionment Committee, labeled LEGIS00000071-75, which was produced in this litigation.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the article titled “Georgia Senate releases first proposed congressional map,” by Dave Williams, published on September 27, 2021, and is available online at <https://capitol-beat.org/2021/09/georgia-senate-releases-first-proposed-congressional-redistricting-map/>.

19. Attached hereto as **Exhibit 17** is a true and correct copy of April 14, 2023 Email from P. Jaugstetter, counsel for the Georgia General Assembly.

20. Attached hereto as **Exhibit 18** is a true and correct copy of a webpage from Common Cause titled “Voting & Elections,” which is available online at <https://www.commoncause.org/georgia/our-work/voting-elections/>.

21. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from the January 13, 2023 Deposition of Treaunna Dennis, Common Cause’s Fed. R. Civ. P. 30(b)(6) Corporate Representative, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case

No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Dennis Dep.”).<sup>4</sup>

22. Attached hereto as **Exhibit 20** is a true and correct copy of the April 26, 2023 Declaration of Treanna (Aunna) Dennis, the Executive Director of the Organizational Plaintiff Common Cause, which is submitted in support of Plaintiffs’ Response in Opposition to Defendant’s Motion Summary Judgment (“Dennis Decl.”).

23. Attached hereto as **Exhibit 21** is a true and correct copy of a webpage from the League of Women Voters titled “Our Principles,” which is available online at [https://lwvga.clubexpress.com/content.aspx?page\\_id=22&club\\_id=996555&module\\_id=506655#principles](https://lwvga.clubexpress.com/content.aspx?page_id=22&club_id=996555&module_id=506655#principles).

24. Attached hereto as **Exhibit 22** is a true and correct copy of the January 13, 2023 Deposition of Julie Bolen, League of Women Voters’ Fed. R. Civ. P. 30(b)(6), which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Bolen Dep.”).<sup>5</sup>

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<sup>4</sup> The full transcript of the Deposition of Treanna Dennis was filed on March 27, 2023, at ECF No. 90, as provisionally sealed.

<sup>5</sup> The full transcript of the Deposition of Julie Bolen was filed on March 27, 2023,

25. Attached hereto as **Exhibit 23** is a true and correct copy of the April 26, 2023 Declaration of Julie Bolen, Chair for Redistricting Committee of the Organizational Plaintiff the League of Women Voters of Georgia, which is submitted in support of Plaintiffs' Response in Opposition to Defendant's Motion Summary Judgment (Bolen Decl.).

26. Attached hereto as **Exhibit 24** is a true and correct copy of the Expert Report of Moon Duchin, Ph.D., dated January 13, 2023, which was served in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia ("Duchin Rpt.").

27. Attached hereto as **Exhibit 25** is a true and correct copy of a map by Sen. Kennedy and Lt. Gov. Duncan, which was publicly released on 9/27/2021 (the "Kennedy-Duncan Plan"), which is available online at [https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/cong-s18-p1-packet.pdf?sfvrsn=dd7b16e7\\_2](https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/cong-s18-p1-packet.pdf?sfvrsn=dd7b16e7_2).

28. Attached hereto as **Exhibit 26** is a true and correct copy of the Proposed Map SB 2EX, which is available online at [https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/congress-prop1-2021-packet.pdf?sfvrsn=104b7388\\_2](https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/congress-prop1-2021-packet.pdf?sfvrsn=104b7388_2).

29. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts of the Rebuttal and Supplemental Report by Moon Duchin, Ph.D., dated February 15, 2023, which was served in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Moon Supp. Rpt.”).

30. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts of the February 24, 2023 Deposition of Robert Strangia, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Strangia Dep.”).

31. Attached hereto as **Exhibit 29** is a true and correct copy of excerpts of the report by Thomas L. Brunnell, Ph.D. titled “Report on Racial Bloc Voting in Georgia,” labeled Bates Nos. LEGIS00019244-19244.23, which was produced in this litigation (“Brunnell Rpt.”).

32. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts of the Expert Report of Peyton McCrary, dated January 13, 2023, which was served in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“McCrary Rpt.”).

33. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts of the Expert Report of Dr. Benjamin Schneer, dated January 13, 2023, which was served in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Schneer Rpt.”).

34. Attached hereto as **Exhibit 32** is a true and correct copy of excerpts of the January 16, 2023 Deposition of Sen. Mike Dugan, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Dugan Dep.”).

35. Attached hereto as **Exhibit 33** is a true and correct copy of excerpts of the January 17, 2023 Deposition of Rep. Jan Jones, which was taken in the action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Jones Dep.”).

36. Attached hereto as **Exhibit 34** is a true and correct copy of excerpts of the January 19, 2023 Deposition of Rep. Barry Fleming, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Fleming Dep.”).

37. Attached hereto as **Exhibit 35** is a true and correct copy of excerpts of the January 20, 2023 Deposition of John F. Kennedy, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Kennedy Dep.”).<sup>6</sup>

38. Attached hereto as **Exhibit 36** is a true and correct copy of excerpts of the March 17, 2023 Deposition of Daniel J. O’Connor, III, which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“O’Connor Dep.”).

39. Attached hereto as **Exhibit 37** is a true and correct copy of the Notice of Errata for Dr. Moon Duchin’s January 13, 2023 Expert Report, which is dated April 26, 2023.

40. Attached hereto as **Exhibit 38** is a true and correct copy of excerpts of the February 27, 2023 Deposition of Moon Duchin, Ph.D., which was taken in the consolidated action *Georgia State Conf. of the NAACP, et al. v. State of Georgia, et al.*, Case No. 1:21-cv-5338-ELB-SCJ-SDG, pending in the United States District Court for the Northern District of Georgia (“Duchin Dep.”).

---

<sup>6</sup> The full transcript of the Deposition of Sen. John Kennedy was filed on March 23, 2023, at ECF No. 83.

41. Attached hereto as **Exhibit 39** is a true and correct copy of the October 21, 2021 Democratic Caucus proposed Congressional Map, which is available online at [https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/ghdc-gsdc-cong-plan1-packet.pdf?sfvrsn=bb619b12\\_2](https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/congress/ghdc-gsdc-cong-plan1-packet.pdf?sfvrsn=bb619b12_2).

42. Attached hereto as **Exhibit 40** is a true and correct copy of an email from Brian Strickland, attorney, to the Georgia GOP Senators listserv, Bates Stamped LEGIS00011157, which was produced in this litigation.

43. Throughout the course of discovery in this case, counsel for third party legislators and the Legislative and Congressional and Reapportionment Office has represented that the only draft maps that were saved and retained from the 2021 Redistricting Cycle were (i) the Kennedy-Duncan Plan, and (ii) the Democratic Caucus's proposed map.

I declare under penalty of perjury under the laws of the State of Georgia that the foregoing is true and correct. Executed in Los Angeles, California, on this 26th day of April, 2023.

By: /s/ Cassandra Nicole Love-Olivo  
Cassandra Nicole Love-Olivo



# EXHIBIT 1

# Legislative and Congressional Reapportionment Office

The Legislative and Congressional Reapportionment Office is a joint office of the Georgia General Assembly responsible for providing the General Assembly with redistricting services. The office uses data provided to the State of Georgia by the U.S. Census Bureau for the purpose of redistricting. In addition to providing the technical assistance to redistrict, the office provides an array of maps and up to date data reports which include information on demographics, precincts, and local redistricting.

For more information, visit the [House Reapportionment and Redistricting Committee](#) or the [Senate Reapportionment & Redistricting Committee](#).

Maps of the statewide districts used for the 2022 General Election can be found under the "Quick References" tab below and also under the tab labeled "Statewide Plans." Other proposed maps from the 2021 Special Legislative Session are under the tab "Proposed Plans" under the heading "Draft Maps." Links to other useful information can be found under the "Resources" tab.

## Office Address

407 Coverdell Legislative Office Building  
18 Capitol Square  
Atlanta, Georgia 30334  
Office: 404-656-5063  
Fax: 404-463-4103

## District Map Requests & Pricing

Please direct all requests for maps to the [Reapportionment Office via email](#).








Map Price List

View Public Comments







## Proposed Plans

### ▼ 2021-2022 Adopted Maps- Effective for 2022 Elections

House Districts- As passed Nov. 12, 2021- House Committee Chair- House Bill 1EX


-  [District Packet \(Maps and Population Reports\)](#)
-  [GIS Shape file](#)  
GIS software required.
-  [Google Earth \(KML\)](#)  
Required: [Download Google Earth](#)
-  [Block Equivalency File](#)
-  [House-prop1-2021 District Number report](#)
-  [Counties within Districts Report](#)
-  [Cities within Districts Report](#)


Senate Districts- As passed Nov. 15, 2021- Senate Committee Chair- Senate Bill 1EX

-  [District Packet \(Maps and Population Reports\)](#)
-  [GIS Shape file](#)  
GIS software required.
-  [Google Earth \(KML\)](#)  
Required: [Download Google Earth](#)
-  [Block Equivalency File](#)
-  [Counties within Districts Report](#)
-  [Cities within Districts Report](#)

Congressional Districts- As passed Nov. 22, 2021- Senate and House Committee Chairs- Senate Bill 2EX

 [District Packet \(Maps and Population Reports\)](#)

 [GIS Shape file](#)  
GIS software required.

 [Google Earth \(KML\)](#)  
Required: [Download Google Earth](#)


 [Block Equivalency File](#)

 [Counties within Districts Report](#)

 [Cities within Districts Report](#)

Public Service Commission Districts- As passed March 4, 2022- Senate Bill 472

 [District Packet \(Map and Population Report\)](#)

 [GIS Shape file](#)  
GIS software required.

 [Block Equivalency File](#)

 [Counties within Districts Report](#)

Additional Reports

 [Explanation of Population Summary Headings](#)

 [Counties with Legislative and Congressional Districts- 2022](#)

 [Cities with Legislative and Congressional Districts- 2022](#)

 [State House and Senate Districts in Congressional Districts- 2022](#)

▶ 2022 Draft Maps

▶ 2021 Draft Maps

Helpful Links

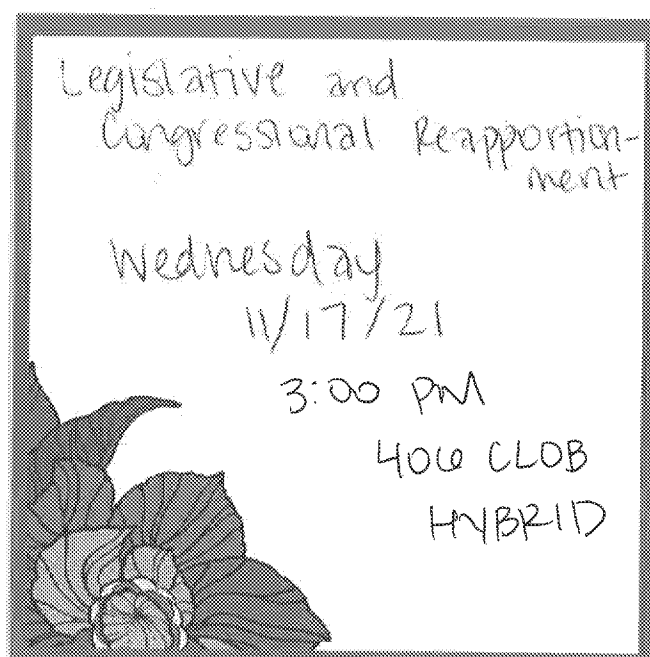
- [Georgia.gov](#)
- [Governor's Office](#)
- [Secretary of State](#)
- [Georgia Department of Motor Vehicles](#)
- [Georgia Department of Driver Services](#)
- [Georgia Department of Revenue](#)
- [Georgia Department of Labor](#)

Legislative Resources

- [House of Representatives](#)
- [Senate](#)
- [Open RFP's](#)
- [Senate Staffing](#)
- [Intern Program](#)

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# EXHIBIT 2



PUBLIC



**BONNIE RICH**  
Representative, District 97  
PO Box 663  
Suwanee, Georgia 30024  
Bonnie.Rich@house.ga.gov

**House of Representatives**  
COVERDELL LEGISLATIVE OFFICE BLDG  
18 CAPITOL SQUARE, SUITE 402  
ATLANTA, GEORGIA 30334  
(404) 656-5087 (Office)

**STANDING COMMITTEES**  
**Legislative & Congressional**  
**Reapportionment; Chairman**  
Education, Judiciary,  
Retirement, Ways & Means,  
Special Committee on Access to  
Civil Justice System  
Special Committee on Election Integrity

November 16, 2021

TO: House Legislative and Congressional Reapportionment Committee  
FROM: Representative Bonnie Rich, Chairman

The House Legislative and Congressional Reapportionment Committee will have a meeting on Wednesday, November 17, 2021, 3:00 p.m. to 5:30 p.m. in CLOB 406.

**AGENDA:**

- Initial consideration and public comment of HB 2EX
- Initial consideration and public comment of HB 5EX

*\*Agenda subject to change at the discretion of the Chair.*

Zoom details for participants will follow via email.

This meeting will be available to the public via livestream on the [House Broadcast webpage](#).

cc: Speaker's Office  
Clerk's Office  
Legislative Counsel  
Policy Analyst  
Fiscal Office  
Media Services

NOT  
PUBLIC



MEMBERS ON  
ZOOM:

---

- RANDY NIX
- KIMBERLY ALEXANDER

IDEAL  
CONGRESSIONAL  
DISTRICT  
SIZE:

---

765,136

EACH MEMBER HAS IN  
FRONT OF THEM:

---

- PUBLIC COMMENTS  
SINCE 11/08/21
- GHDC<sup>-USDC</sup> MAP PACKET
- JOINT MAP PACKET
- COMMITTEE GUIDELINES
- COMMITTEE RULES

### Microphone List:

~~29-Scott~~

~~17-Prince~~

28- billiard

~~2A-Scott~~

ZOO M - Alexander

~~29. SCOT~~

~~17-prince~~

21-Taylor

VAH - SUU

Ahh-Bee-Rah-Men

406, 506, or 606 CLOB

1	2	3	4	5	6	7	8	9	10	11	12

RESISTRATION	JONES		FLEMING	PRINCE	DOLLAR	BALLINGER		RICH	TAYLOR	L. SMITH	R. SMITH			JACKSON		GILLARD	SCOTT
13	14	15	16	17	18	19	20	CHAIR	21	22	23	24	25	26	27	28	29

AVAILABLE



Legislative and Congressional Reapportionment Committee Attendance  
2021

Date: 11/17/21 Room: 406 CLOB Time: 3:00 PM

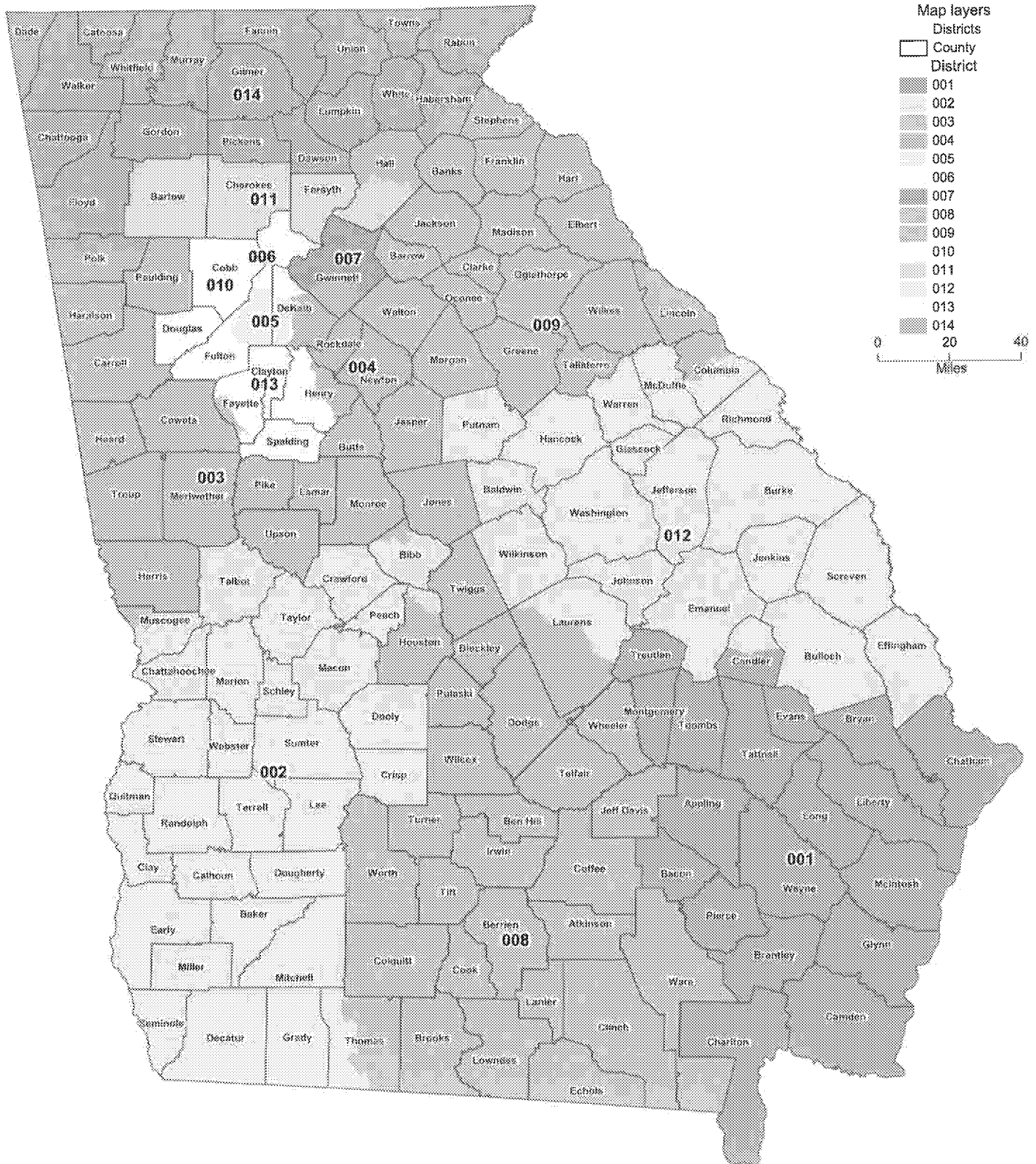
- ☒ Bonnie Rich - Chair
- ☒ Darlene Taylor - Vice Chair
- ☐ Susan Holmes - Secretary
- ☒ Kimberly Alexander (VIRTUAL)
- ☒ Mandi Ballinger
- ☐ Buddy DeLoach
- ☒ Matt Dollar
- ☒ Chuck Efstration
- ☒ Barry Fleming
- ☒ Carl Gilliard
- ☒ Mack Jackson
- ☒ Jan Jones
- ☒ Randy Nix (VIRTUAL)
- ☒ Brian Prince
- ☒ Sandra Scott
- ☐ Ed Setzler
- ☒ Lynn Smith
- ☒ Richard Smith

TOTAL PRESENT 15

PUBLIC

# Proposed Georgia Congressional Districts

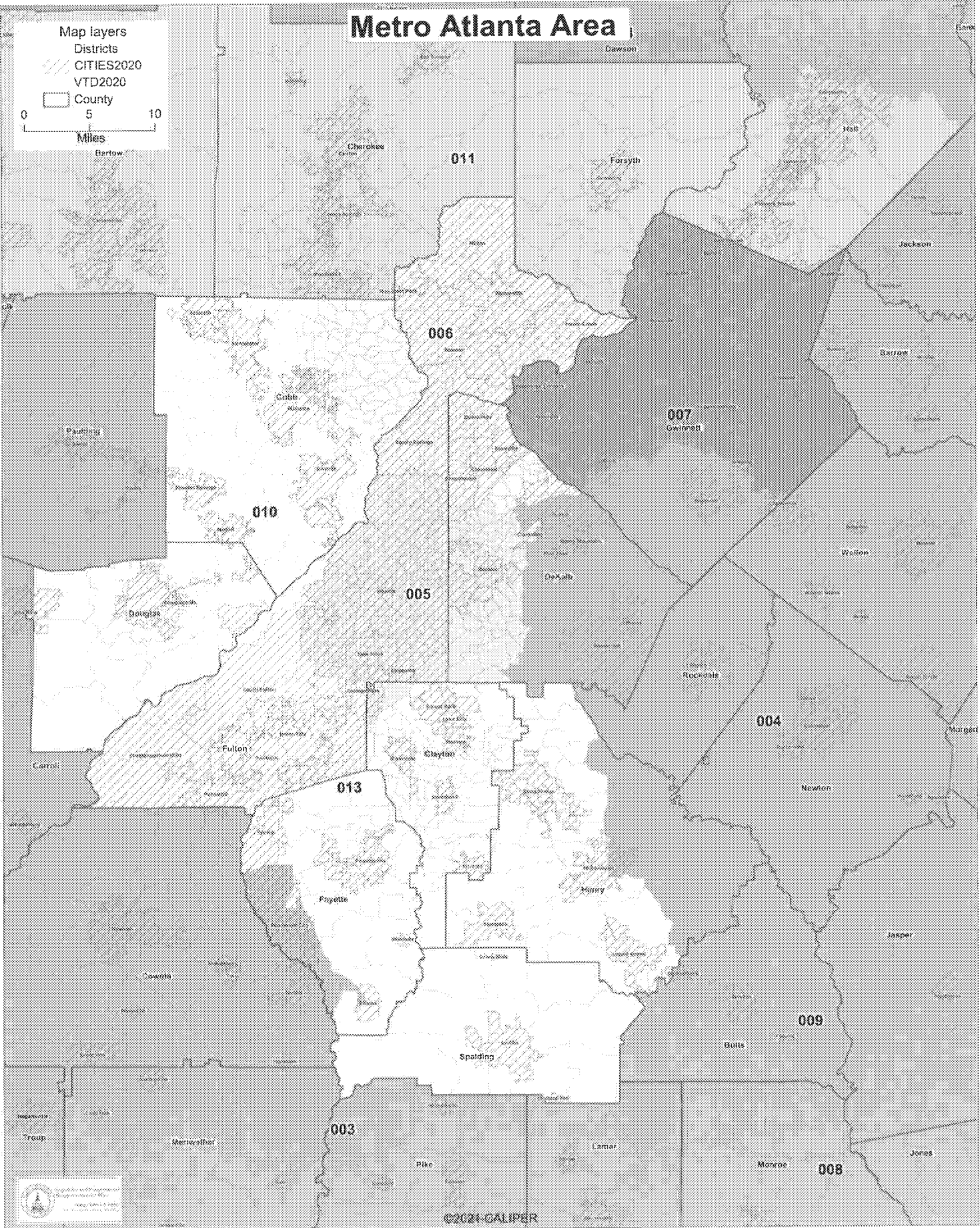
client: HD143  
type: Congress  
plan: GHDC-GSDC-CongPlan1



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LEGIS00002263

# Proposed Georgia Congressional Districts





User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:23 AM

**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%	590,786	77.21%	56.59%	28.29%	8.28%	2.13%	0.23%	0.15%	0.42%	3.9%
002	765,135	-1	0.00%	587,666	76.81%	39.33%	49.92%	5.84%	1.24%	0.2%	0.09%	0.34%	3.05%
003	765,137	1	0.00%	581,128	75.95%	67.53%	19.58%	6.22%	1.92%	0.22%	0.05%	0.46%	4.02%
004	765,136	0	0.00%	579,213	75.7%	24.78%	58.52%	7.8%	4.46%	0.18%	0.04%	0.67%	3.56%
005	765,137	1	0.00%	623,102	81.44%	36.44%	47.63%	6.69%	4.87%	0.16%	0.03%	0.54%	3.64%
006	765,137	1	0.00%	588,726	76.94%	56.04%	12.14%	14%	12.77%	0.13%	0.04%	0.77%	4.12%
007	765,135	-1	0.00%	567,115	74.12%	32.17%	23.82%	25.63%	14.13%	0.15%	0.04%	0.65%	3.41%
008	765,136	0	0.00%	583,936	76.32%	59.13%	28.34%	7.34%	1.51%	0.2%	0.05%	0.31%	3.13%
009	765,137	1	0.00%	594,668	77.72%	70.26%	15.06%	8.18%	2.22%	0.19%	0.03%	0.47%	3.6%
010	765,137	1	0.00%	590,424	77.17%	35.53%	41.44%	14.45%	3.49%	0.18%	0.05%	0.86%	4%
011	765,137	1	0.00%	570,405	74.55%	66.31%	6.64%	15.25%	7.22%	0.19%	0.04%	0.49%	3.86%
012	765,136	0	0.00%	589,460	77.04%	52.15%	36.34%	5.1%	1.93%	0.22%	0.11%	0.38%	3.77%
013	765,135	-1	0.00%	575,033	75.15%	25.7%	56.41%	10.3%	3.38%	0.19%	0.04%	0.66%	3.31%
014	765,136	0	0.00%	598,612	78.24%	78.85%	4.31%	11.74%	0.91%	0.24%	0.03%	0.28%	3.64%

**Total: 10,711,908****Ideal District: 765,136**

User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:25 AM

**Summary Statistics:**

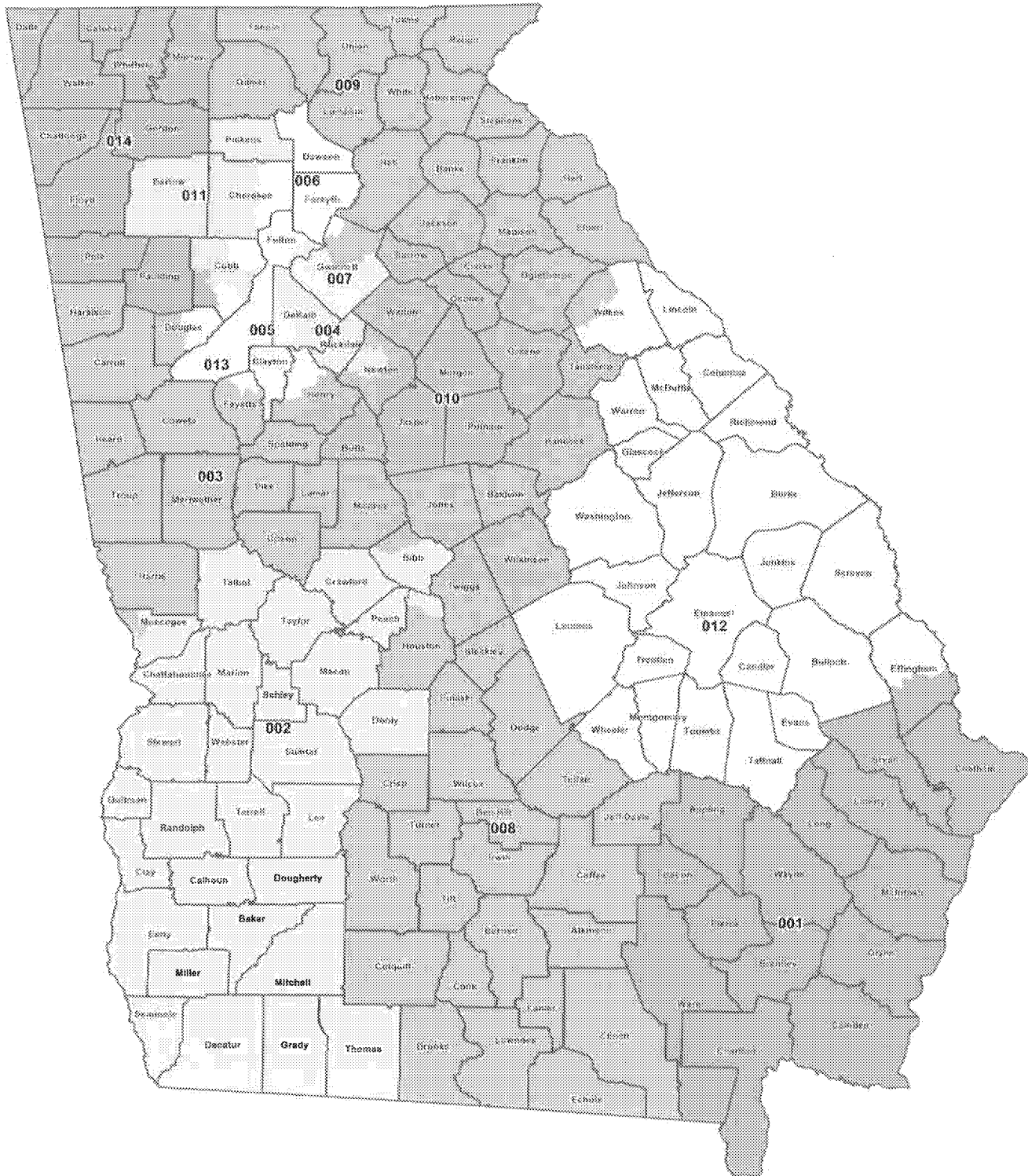
Population Range: 765,135 to 765,137  
 Ratio Range: 0.00  
 Absolute Range: -1 to 1  
 Absolute Overall Range: 2  
 Relative Range: 0.00% to 0.00%  
 Relative Overall Range: 0.00%  
 Absolute Mean Deviation: 0.71  
 Relative Mean Deviation: 0.00%  
 Standard Deviation: 0.80

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%	590,786	77.21%	59.51%	27.16%	7.2%	2.3%	0.24%	0.14%	0.36%	3.1%
002	765,135	-1	0.00%	587,666	76.81%	42.21%	48.38%	5.03%	1.31%	0.22%	0.09%	0.27%	2.49%
003	765,137	1	0.00%	581,128	75.95%	69.81%	19.11%	5.3%	1.92%	0.22%	0.06%	0.37%	3.22%
004	765,136	0	0.00%	579,213	75.7%	27.14%	57.92%	6.72%	4.33%	0.18%	0.04%	0.6%	3.07%
005	765,137	1	0.00%	623,102	81.44%	38.63%	46.2%	6.14%	5.17%	0.16%	0.04%	0.49%	3.17%
006	765,137	1	0.00%	588,726	76.94%	58.57%	12.48%	12.32%	12.44%	0.12%	0.04%	0.69%	3.35%
007	765,135	-1	0.00%	567,115	74.12%	34.96%	23.37%	23.1%	15.07%	0.15%	0.04%	0.54%	2.76%
008	765,136	0	0.00%	583,936	76.32%	61.62%	27.63%	6.23%	1.56%	0.21%	0.05%	0.24%	2.46%
009	765,137	1	0.00%	594,668	77.72%	72.75%	14.61%	6.83%	2.25%	0.2%	0.03%	0.4%	2.93%
010	765,137	1	0.00%	590,424	77.17%	38.71%	40.7%	12.5%	3.66%	0.19%	0.05%	0.8%	3.4%
011	765,137	1	0.00%	570,405	74.55%	70.01%	6.6%	13.09%	6.49%	0.18%	0.04%	0.42%	3.16%
012	765,136	0	0.00%	589,460	77.04%	54.64%	35.25%	4.45%	2.04%	0.23%	0.1%	0.32%	2.97%
013	765,135	-1	0.00%	575,033	75.15%	28.57%	55.4%	8.86%	3.57%	0.2%	0.04%	0.59%	2.76%
014	765,136	0	0.00%	598,612	78.24%	81.74%	4.22%	9.46%	0.92%	0.25%	0.03%	0.23%	3.14%

**Total: 10,711,908****Ideal District: 765,136**

PUBLIC

## Proposed Joint Congressional Districts of Georgia



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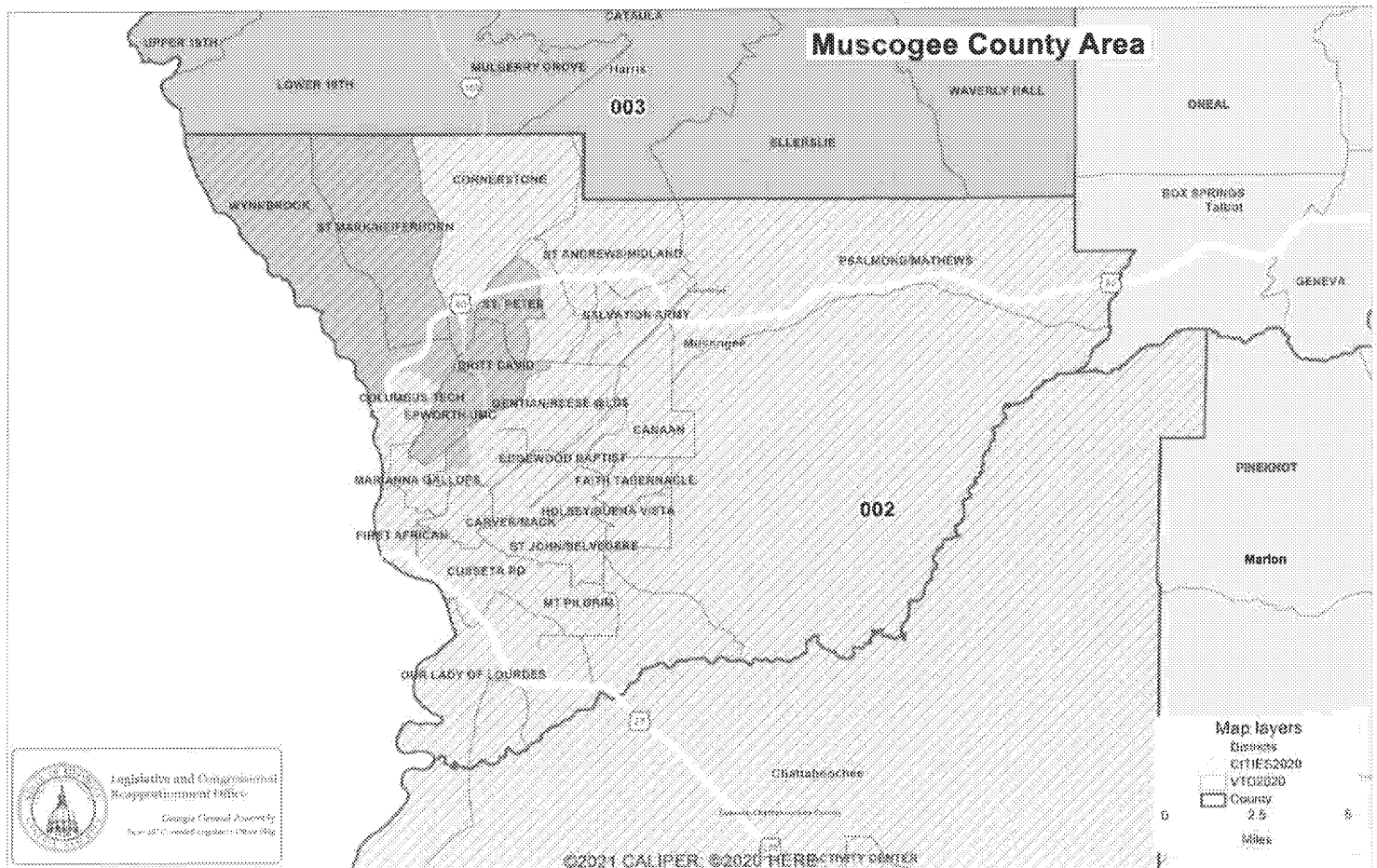
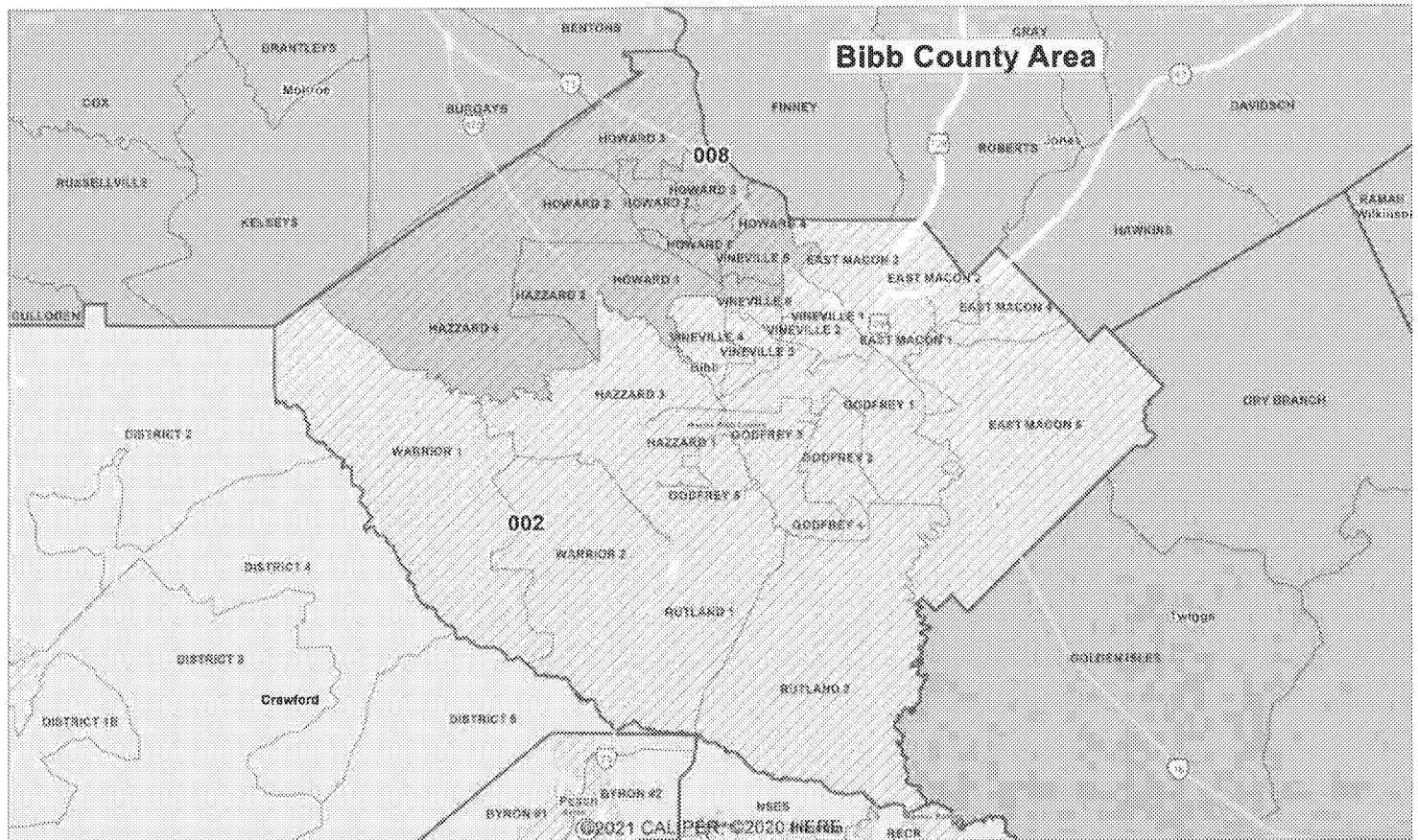
Map layers  
Districts  
County  
20  
40  
Miles

LEGIS00002268





## Proposed Joint Congressional Districts of Georgia



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_Whi]	[% NH_Black]	[% 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**



PUBLIC

# JOINT REAPPORTIONMENT PUBLIC COMMENTS

BETWEEN NOVEMBER 8, 2021 @ 10:00 AM AND NOVEMBER 17, 2021 @ 1:15 PM

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## 11/17/2021K. Lawler of Fulton County

Fair Districts GA: Citizen-drawn maps for Congress We now have 5 maps drawn by experienced citizen map-drawers that are better than either of the proposed plans from the legislature. Earlier this year, Princeton Gerrymandering Project created a citizen mapping corps by judging the results of a nationwide mapping contest. Citizens who demonstrated the best map-drawing skills joined the corps. Fair Districts GA challenged the corps to draw maps for Georgia's congressional delegation. They produced 5 maps that meet or beat all the benchmarks: • 8R-6D partisan balance • 2-5 competitive districts • 5-6 minority-majority districts • 9-15 counties split, as good as or better than the committee and caucus-proposed maps. These maps are available for public inspection via these links: [bit.ly/GAFairCongmap1](https://bit.ly/GAFairCongmap1) [bit.ly/GAFairCongmap2](https://bit.ly/GAFairCongmap2) [bit.ly/GAFairCongmap3](https://bit.ly/GAFairCongmap3) [bit.ly/GAFairCongmap4](https://bit.ly/GAFairCongmap4) This demonstration proves that fair maps are indeed possible.

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## 11/17/2021R. Graham of Douglas County

We are being harmed and defrauded and the felony below isn't being considered by you all? An organized crime by the DNC, Rinos, and Biden Regime using a bio weapon... Peter Daszak "We need to increase public understanding of the need for medical counter measures such as a pan corona vaccine. A key driver is the media and the economics will follow the hype. We need to use that hype to our advantage to get to the real issues. Investors will respond if they see profit at the end of the process" <https://www.bitchute.com/video/tRrJ3gzmvMt8/>

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## 11/17/2021C. Johnson of Cherokee County

I hope all of the Cherokee County Rhinos have enjoyed their time in office! What's done in the dark is ALWAYS brought to the light! We see you!

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## 11/17/2021C. Brown of Cherokee County

As a resident of Cherokee, I have had to swallow the fact this body decided to the destroy Cherokee county with your irresponsible redistribution of our votes to other counties. Now I find it absolutely appalling that we maybe faced with a split congressional district. I am strongly requesting that this not be done. Our county is a proud and one made of people with common interests and we wish to remain as ONE CONGRESSIONAL DISTRICT. Please let is with some dignity.

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## 11/17/2021C. Johnsin of Cherokee County

I CAN NOT believe what Mandi Ballinger, Brad Thomas, Bruce Thompson, Barry Loudermilk, Wes Cantrell, John Carson, Brandon Beech, and John Albers are allowing to happen to Cherokee County! We are watching! We will have candidates to run against you! Your time is up! You ALL WILL BE VOTED OUT! We know who Ralstons puppets are! WE SEE YOU AND YOU WILL BE EXPOSED FOR ALL TO SEE!

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## 11/17/2021D. Stull of Spalding County

First! Kandiss Taylor for Governor. Mack Miller for Lt. Governor and Herschel Walker for Senate. We will vote out all legislatures who didn't fight for audits. Our votes were stolen by the communist democrats and we won't stop until all RINOs are gone and those who participated in election fraud prosecuted. WE WONT STOP!!! ☹️

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**11/17/2021M. Williams of Fulton County**

Throughout the counties it is obvious that is solely for gerrymandering. This is obviously illegal and solely for political gain-it is a de facto attempt to change the voting outcomes and lessen one group of voters' vote for the gain of another voter's political party. This has got to stop. Your job is to represent the people of your community and to continue to gerrymander the districts show that you as representatives to do not want to represent the will of the people. As servants to the people, you must represent the people, not diminish their voice and remove their demands.

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**11/17/2021R. Graham of Douglas County**

Do you count the dead voter for the commy movement to overthrow our rights; like you allow in the fraudulent election? Hitler would be so proud of you all in destroying humanity, taking our right to vote, killing people, spreading suffering, enslaving America, and helping the traitors like Abrams, Kemp, Raffesburger, Warknock, Ossoff and the lot. Who works for Soros? The man who literally helped the NAZIs and said something to the effect of... I can't look at what I do to people on a social aspect, I cant.... Frankly... If none of you are flipping tables and calling out these NAZIs then you all need to go... People are suffering and the suicide rate is up over 600%. People are being harmed by a human experiment injection for a virus that was released on purpose who was organized by the DAM WORLD ECONOMIC FORUM AROUND 2000. Who is standing up? Cowards, commys and traitors? Who among you is ethical? God sees you... We see you... You are all buying the hell you deserve to be sent to.

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**11/17/2021D. Biemiller of Cobb County**

What is being done with these (hundreds?) of concerns voiced in this portal ? Have they been even read? By whom? There have been no responses. This portal is clearly a fake pretense- to mollify us into thinking our concerns are being heard and acted upon. If our concerns in this portal are being read, how can we know this? Shame on those of you in power and desperately grasping to hold on to it.

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**11/17/2021D. Fisher of Gwinnett County**

As a Georgia citizen and voter for more than 20 years, I am dismayed that the secretive nature of the process continues as meetings are being held with very little notice, and the redistricting committees are not forthcoming about exactly which maps will be considered. This makes it impossible for the public to be meaningfully involved. Based on the proposed maps released by the Senate Leadership, Republican-leaning districts from 8 to 9, despite Georgia being a nearly 50-50 state. They have completely ignored the current partisan balance in our state. Additionally, the Republican proposed map has NO competitive districts, denying many Georgians the opportunity to choose their congressional representative.

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**11/16/2021P. WOODLEY of DeKalb County**

The proposed maps DO NOT REFLECT that fact that Georgia is basically a 50-50 state. That is not democracy! There are also too few competitive districts, denying many Georgians the opportunity to choose their congressional representative. Finally, the process has not been transparent as promised. Yes you "accepted" input from we the people but it does not appear to have been listened to or considered.

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**11/16/2021J. Sepela of Chatham County**

I am 100% with what J. Eckles commented. Why would anyone split up Windsor Forest when we do have such a cohesive neighborhood and have nothing in common with Tybee Island. If anything all of the Southside should be in District 165 and not split in two. PLEASE HEAR WHAT WE, THE PEOPLE OF WINDSOR FOREST/SOUTHSIDE ARE ASKING! We're the ones who live here!!!

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**11/16/2021J. Eckles of Chatham County**

Why is a cohesive neighborhood, such as Windsor Forest, get split between District 165 & 166? It looks terrible and does nothing to promote unity. District lines should follow common boundaries rather than arbitrary lines that favor one political party or the other. Please re-evaluate the district lines for 165 and 166. I have very little in common with someone living on Tybee Island and would much rather be included in a district with my neighbor.

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**11/15/2021K. Cavallaro of DeKalb County**

Honestly, I never thought I would see such rampant self-interest revealed in the redistricting process. Despite input from citizens for a transparent process, it was far from the open, thoughtful, reasonable process that is needed to reflect population growth and the political divisions in the state. The proposed maps divide communities in a way that clearly shows intent to obtain specific political goals rather than reflect the population. And finally, we the public, that is, we the PEOPLE, have not been given adequate opportunity to review and give our input into the maps.

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**11/15/2021L. Denzin of Cobb County**

As I watch the videos and from the redistricting committee meetings that have taken place during the Special Session, I am shocked by the total disregard many of the committee members have for the voice of the people. I sat in the meeting room on 11/4/21 while Vice Chair Bill Cowser proudly held up a stack of postcard sent by fellow Georgians urging the committee to use fair, transparent, apolitical means for determining the new districts. Holding up the cards does not equate to listening and responding appropriately to the constituents. It was an act - THAT was transparent! Also, Chair Kennedy was very proud to announce how thousands of Georgians had submitted comments online and at the public hearings around the state. Again, acknowledging the will of the people is not translating to the maps they are drawing and rushing through for a vote. This is a farce. I suggest to these legislators that they watch just what the People of Georgia can do before the next census.

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**11/14/2021D. Gordon of DeKalb County**

I am very disappointed and upset that the current redistributing map splits communities of color and minority racial groups to keep power and voting influence in white communities. Especially in a state which went to Joe Biden and two Democratic Senators. It's a call back to Jim Crow laws. Please use an independently backed map or one that both Democrats and Republicans agree on. Otherwise it's just another instance of white supremacy in our state's problematic history.

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**11/14/2021N. Jemmott of Fulton County**

I am very concerned that the redistricting process continues to lack transparency. The committees have failed to respond to the hundreds of comments they have heard or received in the portal. Additionally, the Republican proposed congressional map ignores the current partisan balance in Georgia and increases the Republican-leaning districts from 8 to 9. Lastly, the Republican proposed congressional map denies many Georgians the opportunity to choose their congressional representative because it has no competitive districts.

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**11/14/2021A. Lee of Bacon County**

To whom it may concern, I was inquiring information concerning organization's, wealthy, and, or, individuals with technical knowledge, invading lower class person's life completely. Such as trying to act as ruler, God, master. If you do not comply, punishment follow's nothing from the judicial system, or meet's nothing of government standard's. Physic warfare, for those who are gifted. From what I've witnessed mind, technology, physical. I'm writing you because I am a survivor and have first hand knowledge. My tv's, vehicle's, phone's, and mind hacked! The government need's to take serious look into this. This is real threat to all person's who have no idea and it is

spreading like a wild fire through the line's. I was tortured for two and a half year's by group's that didn't like what I stood for and seen that I had no asset's. Individual's that were seeking monetary gain, you have a murderer, what they do to a human physically. Imagine what their mind's consist of. Ashley D Lee

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**11/14/2021A. Harwood of Fulton County**

This new map represents classic gerrymandering, a practice that we in Georgia should put behind us. It ignores the democratic principals of our Constitution and has been given a failing grade for fairness. Please do the right and moral thing and make redistricting bipartisan by creating an independent bipartisan commission to work on the redistricting map so that ALL Georgians can have an equal voice. Please vote NO on the new map, and please give Georgians a fair map.

---

**11/14/2021S. Dattilo of Fayette County**

I am opposed to the redistricting as currently proposed. The map shows Fayette county being split into 4 pieces and those pieces being combined with pieces of 4 other counties. And some of our cities are even being split in half - this is ridiculous- keep all of Fayette in one district! Do what is best for the party that elected you not what is best for the speaker!

---

**11/13/2021R. Bruce of Cobb County**

Bonnie, I am confused. Gerrymandering is supposed to be the method used to eliminate troublesome people in the opposite party. Rep. Singleton has been an outstanding standard bearer for the Republican Party and well loved by his constituents. Your suggested redistricting map does not just trim the edges or balance out the numbers for adjoining districts. A suspicious person would conceive of the possibility of malice. A suspicious person would conceive of political motives. Suspicious people might see reason to file a court challenge to the curious map as it stands. Avoiding such an open family feud in the Republican party would be preferred to airing the family's dirty laundry. I am asking that you reconsider this portion of the map. I believe it is well with in your power to do so. "live not by Lies" Thank you for your attention to this matter. Ralph Bruce

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**11/13/2021T. Leslie of Fulton County**

As I celebrated my Birthday in October, I was reminded of the (representative), of this Nation. The movements of certain Political Parties seem, HELL BENT on dividing the citizens, property and unfair realigning GA. Where is the Honest (Man & Woman), that once yearn to SERVE! To the best of their ability without the need to Draw Lines in the DIRT in order to win a Political Office. How sad our Nation has become, where the focus is on (SELF), not those you've all made promises to. I miss Adult Representation-

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**11/12/2021C. DRIVER of Houston County**

The people of Georgia deserve a fair redistricting process. It saddens me that our representatives care more about saving their seats than saving electoral integrity. These maps are a strategic distortion by Republican lawmakers who are using the citizens of Georgia as pawns in their partisan ways once again. My recommendation is to use your political prowess for positive benefit of the constituents you represent.

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**11/12/2021C. Higgins of Coweta County**

Please do not disenfranchise my vote by dividing up any part of coweta county. Putting any part of Coweta into Fulton county , the most corrupt county in the state by Republicans behind closed doors reminds me on the Consent Decree negotiated by our Secretary of State last year that was done the same way. The Dems would NEVER divide any of their majority counties for any reason! The people of Coweta are saying No, No, No!!



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**11/12/2021A. Woodd of Coweta County**

Splitting Coweta County so much is ridiculous and making us part of Fulton county is even worse. There is absolutely no reason to make any portion of Coweta county part of Fulton county representation. This also gives Republicans less of a voice in our government because Fulton county votes democrat every time; Coweta is historically a Republican county. How exactly will a representative from a county that encompasses mostly Atlanta be of any benefit to the people or Coweta county? — they won't!

---

**11/12/2021G. Ashley of Clayton County**

I am absolutely disgusted by the maps. As chairman of the Clayton County Republican Party, even I have to admit that the Democrat Caucus drew better maps than the Committees. Thank you, Reps Singleton (R-71) and Byrd (R-20) for being a voice of reason among the masses. Shame on the Georgia General Assembly and the Committees that refuse to listen to the voters.

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**11/12/2021D. Nguyen of DeKalb County**

Please keep Dunwoody in one district.

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**11/12/2021M. Jabaley of Columbia County**

Why would Ralston want to be vindictive in redistricting to anyone who wants to find the truth in the election? Georgians have demanded election integrity from their public servants" and it has fallen on deaf ears. Now, it appears the redistricting scheme is another way to hurt Georgians once again. Shameful and Sad. Very sad.

---

**11/12/2021S. Offord of Fayette County**

I am opposed to the redistricting as currently proposed. The map shows Fayette county being split into 4 pieces and those pieces being combined with pieces of 4 other counties. And some of our cities are even being split in half meaning 2 people will try to represent one city. How will that work ????

---

**11/12/2021J. Laroche of Coweta County**

Just like to say no to the redistricting of Coweta country. Sincerely J. L.

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**11/11/2021H. Hallett of Fulton County**

I've just read through some of the comments and it disheartens me that so many voters are participating in the process, looking at maps, submitting comments, and expecting the democratic process to work. From the way this special session has been conducted, it doesn't look the people representing all of these voters and working in the same good faith. Rushed maps, deals made to protect majority power, party-line voting. It all stinks. I can't think that you all went into politics to deliver this type of representation to your constituents, but the system is set up (you all being in charge of drawing the maps) in such a way that you are not incentivized to work for the voters but for yourselves. This system must be reformed. I wish that you all were super-human and could resist the pull of party politics and keeping yourselves and your party in power, but you are proving that is not the case. Reform this process and stop putting yourselves in this impossible position.

---

**11/11/2021L. Lasher of Fayette County**

As a Fayette County resident, I STRONGLY oppose splitting my county's voting power by diluting it amongst 4 other counties. It is extremely unfair for my county to have NO say in determining our future!!

---

11/11/2021**K. Garcia of Fayette County**

I 110% DO NOT agree with redistricting Fayette County or any other for that matter! My family and I moved here for the small town feel and because we have shared interests with our community. Splitting our county up to include votes of other counties that have nothing to do with our small town is illogical and preposterous! I assure you that abusing this use of power to serve a political agenda will guarantee you do not get re-elected in the long run. You have a responsibility to uphold the interests of your constituents, so do it!

---

11/11/2021**S. Chester of Cherokee County**

Stop this nonsense! We the people do not approve of redistricting. It does not fairly represent the majority of the vote in Cherokee County. Represent us (the voters) and do better. Vote no to redistricting.

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11/11/2021**L. Moore of Cobb County**

Do Not Redistrict the voting boundaries, Stop politicking!! You were voted in by the people and can be voted out by the people, we are awake and watching for shenanigans, no Dominion machines, no mass mail-out ballots, the corruption is sickening.

---

11/11/2021**P. Short of DeKalb County**

Districts should be drawn to represent communities, not give partisan advantage. Athens districts are drawn to diffuse the voices of UGA students, not represent their community. As a City of Dunwoody resident I am dismayed at proposed maps for our district. There is no reason to divide this municipality. It only serves to support partisan interests and not the interests of my community. Do better! We need independent redistricting commissions. Y'all have proven you do not take this responsibility seriously.

---

11/11/2021**J. Aron of DeKalb County**

This is blatant gerrymandering designed to diminish the influence of voters of color. GA's population of people of color has increased, yet our districts are being redrawn to split us up and give more power to white Georgians? What? Georgians see through this and will stand against it for as long as it takes to restore voting rights and democratic representation to every citizen of our state.

---

11/11/2021**M. Olson of Fayette County**

Why are you splitting Fayette County into four districts where our voices become the minority in every one? Cities are being divided into multiple districts. This process needs some serious light shed in it and slowed down.

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11/11/2021**C. Martin of Fayette County**

THIS HAS TO STOP!!!! What they heck are y'all thinking?!?! People move into these counties and district intentionally!!! And not you just going to move lines around?!? Stop it and take care of your people that elected you!! Get out of the politics of it and do what's right!!!! Gerrymandering is never a good thing. Stop it!!

---

11/11/2021**J. Osburn of Coweta County**

There is no justifiable reason whatsoever to carve up Coweta County and lump us in with Fulton - you are blatantly redrawing these maps to change our elected representation in the future. Stop trying to destroy what's left of the suburbs by making us guilty by association. Coweta is NOT Fulton! This is blatant gerrymandering and we vote NO!

---

**11/11/2021S. Lanier of Ware County**

I should like to see FAIR representation reflected in the re-drawing of Congressional Districts. PARTISAN redistricting is KILLING DEMOCRACY. Short term political gain will result in long term disaster. It's like climate change: a little bit more profit now is NOT going to be enough to save you from the consequences.

---

**11/11/2021S. Bristow of Coweta County**

Please slow the redistricting process down. Lawmakers are moving through it way to quickly. Georgians deserve a fair, inclusive and transparent process.

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**11/11/2021S. Brown of Fayette County**

WOW ! I'm tired of being nice about this. This will affect people for 10 years! People all over Georgia are mad about this, regardless of political affiliation, race, etc. Someone with a little common sense needs to get involved before you finalize this plan! You work for us, not the House leadership! If gut Fayette County and Coweta County, I know I'll be donating to candidates who run against you in YOUR next primary. With the current plan, I may lose my voice to control who sits in MY House District. But I'll still be able to help get someone better in yours. Primaries are a wonderful way of purging people who are following the wrong sector of the party. They say, "Elections have consequences." If you steal our vote, we can always try to take yours away from you too!

---

**11/11/2021N. Strickland of Coweta County**

After all we as families have suffered due to the CORONAVIRUS PANDEMIC, I think it is deplorable that those in elected office would cause more damage and headache by tearing communities and schools a part to serve personal political propaganda. Coweta County has nothing to do with Fulton County. There should be no redistricting between county lines. This is clear and obvious abuse of political position. I absolutely oppose this. I am reading comments from those within the Fulton County lines begging YOU to stop tearing the communities apart. Parents in our district do NOT want this. Parents in the other districts do NOT want this. Whatever your political propaganda is to redistrict it, you are not considering what is best for the children of these counties and you should feel ashamed of yourself.

---

**11/11/2021D. Young of Fayette County**

I am against the redistricting plan for Fayette county. Carving our county up in chunks makes no sense and lumps us in with surrounding counties, which means Spaulding, Henry and other counties get to decide what happens here. NO!

---

**11/11/2021K. Detwiler of Fayette County**

Splitting Fayette county into 4 districts is ridiculous. It really looks like you're doing something underhanded when our population is small and now we're totally carved up. Please don't do this!

---

**11/11/2021M. Ramos of Gwinnett County**

The bills being sent through committee are rushed. Our voting districts deserve deliberate discussion and careful consideration. What is happening currently is clearly not either of those things. This should not come to a vote today.



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11/11/2021**A. Swygert of DeKalb County**

When a committee votes on a bill less than 24 hours after allowing public testimony, it's clear that the intent of public testimony wasn't to actually listen to the public. It was to pretend to listen to the public. And when the GOP House leadership won't allow a vote on the Democrats' proposal, which works better for all of those that testified at the Committee hearing, it's clear that this process is purely a partisan power grab. Shame on the GA GOP.

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11/11/2021**J. Shelton of Fayette County**

The districts should represent a community with shared interests stop playing games for your political ends.

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11/11/2021**N. Haas of Bartow County**

The proposed redistricting changes that abnormally extend the Fulton Co. district south into a large chunk of Coweta Co. where Singleton and his family live is at best short sighted and at worst punitive to representative Singleton. I don't believe in coincidences. Therefore, I ask that this retribution for differing ideas be corrected.

---

11/11/2021**E. Smith of Coweta County**

There is no justifiable reason whatsoever to carve up Coweta County and lump us in with Fulton - you are blatantly redrawing these maps to change our elected representation in the future. Stop trying to destroy what's left of the suburbs by making us guilty by association. Coweta is NOT Fulton.

---

11/11/2021**C. Hudson of Coweta County**

Please do not approve. The current districts. I live in Coweta County and the proposed map divides our county and will not allow for fair representation. Please keep our community together.

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11/11/2021**C. Raspberry of DeKalb County**

I am writing today as a 5-year Dunwoody resident to ask that you keep our Dunwoody committee in a single House district. Dunwoody is small enough to be within a single district, and as my fellow Dunwoody neighbors have mentioned, we truly are a close-knit community. In our businesses, churches, schools, and parks, people from all over Dunwoody work together, worship together, learn together, and play together, sharing many common values and goals. We would benefit from representation that can speak for all of us, as is currently the case. We respectfully ask that you find a way to keep our community in a single district as we have been for years by either adjusting your map or, if it is easier, adopting the democrat-drawn map. Thank you.

---

11/11/2021**C. Abbey of Coweta County**

I understand that the Georgia House has sent the GOP proposed house redistricting plan to the Senate, only a few days after the maps came to light. Why not take the time to consider significant input from the public? Especially since we will have to live with the results for 10 years. What a shame that conservative northern Coweta was split off and absorbed into two Fulton County districts (65 & 67). It is not just Rep. Singleton's district which has been affected. Why Coweta County, with a 150,000 population, needs to be carved up into five districts is mystifying. This gerrymandering is HEINOUS. We should have no more than three house districts! And that is exactly what the Democrat proposal included! Please vote NO to the GOP proposal unless it is modified to correct the issues with Coweta.

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11/11/2021**W. Couch of Coweta County**

Vote "NO" to Northern parts of Coweta being redistricted to South Fulton. We do not want to be a part of that

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11/11/2021**B. Wilson of Coweta County**

Do not redistrict northern Coweta County into South Fulton. I am absolutely opposed!!

---

11/11/2021**N. Howell of Coweta County**

Our community of interest in Northern Coweta will be no longer if this "Georgiamandering" happens. It's wrong on so many levels and disappointing that we the voters found out about this a little too late.. We want to have a voice - Change your mind and VOTE NO!!!

---

11/11/2021**N. Howell of Coweta County**

Our community of interest in Northern Coweta will be no longer if this "Georgiamandering" happens. It's wrong on so many levels and disappointing that we the voters found out about this a little too late.. We want to have a voice - Change your mind and VOTE NO!!!

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11/11/2021**T. Deavers of Cobb County**

Please vote NO to redistricting. Remember the people that voted to put you in office, and don't pull the rug out from under them. They deserve to have a voice.

---

11/11/2021**B. Broich of Coweta County**

We are not in favor of redistricting Coweta County. Do not change our county's voice

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11/11/2021**M. McKasty of Coweta County**

Stop the shenanigans. If we wanted to live in Fulton County we would have moved there .

---

11/11/2021**C. Wilson-McKasty of Coweta County**

C. Wilson-McKasty of Coweta County Do not redistrict north Coweta into south Fulton. It is wrong to silence our voices. This redistricting is not in the best interest of our community.

---

11/11/2021**K. Stowe of Coweta County**

Please do not allow northern Coweta County to be included in South Fulton voting lines. This would create a situation where our voices will not be heard. Please do not silence to create your political agenda.

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11/11/2021**J. Janas of Coweta County**

I have lived in coweta county for 52 years. We vote in the politicians to respresent "We the people". "We" are not being represented at all. We are being used and traded so that our votes will be dissolved in a democratic county. Why would anyone live in Coweta and vote Fulton? It's absurd. There is obviously a narrative here to manipulate the votes to appease the politicians. I feel betrayed and I'm disgusted in my representatives for supporting this sneaky agenda

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**11/11/2021K. Miles of Coweta County**

Do not redistrict north Coweta into south Fulton. It's wrong to silence our voices. We are two very different areas.

---

**11/11/2021C. Battles of Fulton County**

Comments to House Redistricting Committee 11/9/2021 Madame Chair and Committee: Thank you for allowing us to make public comment this morning before you consider the proposed House district maps. As I mentioned yesterday, we did not have a chance to analyze the new maps or update our comments between the time we received the new maps and the committee started so we appreciate this extra time. Starting off, we are disappointed that this committee has the resources and means to create more majority-minority districts so that the Georgia Assembly can reflect the diversity of our state as clearly defined by the results of the 2020 census. Rather than taking the opportunity to empower voters of color in Georgia, it feels like you are deliberately cracking and packing districts to take away that power. One of the things we noticed is that Johns Creek precincts in North Fulton and Southeast Forsyth County have been reshuffled to put district 50 entirely within North Fulton and District 25

---

**11/11/2021C. Battles of Fulton County**

Comments to House Redistricting Committee 11/9/2021 Madame Chair and Committee: Thank you for allowing us to make public comment this morning before you consider the proposed House district maps. As I mentioned yesterday, we did not have a chance to analyze the new maps or update our comments between the time we received the new maps and the committee started so we appreciate this extra time. Starting off, we are disappointed that this committee has the resources and means to create more majority-minority districts so that the Georgia Assembly can reflect the diversity of our state as clearly defined by the results of the 2020 census. Rather than taking the opportunity to empower voters of color in Georgia, it feels like you are deliberately cracking and packing districts to take away that power. One of the things we noticed is that Johns Creek precincts in North Fulton and Southeast Forsyth County have been reshuffled to put district 50 entirely within North Fulton and District 25

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**11/11/2021D. Stanley of Fayette County**

Keep Fayette Co whole, do not dilute our votes by chopping up Fayette into 4 small pieces to add onto 4 larger districts. Don't take our votes away!

---

**11/11/2021A. Richardson of Coweta County**

Do not redistrict Coweta County we will lose our voice. DO NOT SILENCE US!

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**11/11/2021J. Calabro of Coweta County**

Do not redistrict Coweta County we will lose our voice. DO NOT SILENCE US!

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**11/11/2021S. Holzer of Forsyth County**

Please do not redistrict our area of south Forsyth off Old Alpharetta Rd. We are conservative & have voted Republican for years & want to be represented by Republicans. We want to stay in Todd & Greg's districts.

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**11/10/2021J. Woodard of Coweta County**

Hey Georgia, stop trying to be Illinois!! They are going to have to change the term to Georgia-mandering after this one!!

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11/10/2021**J. Woodard of Coweta County**

Coweta isn't Fulton for a reason....this is simply an attempt to broaden Democrat controlled districts.....leave Coweta ALONE!

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11/10/2021**J. Kegley of Fayette County**

Don't redistrict!!!!

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11/10/2021**J. Kegley of Fayette County**

Dilutes and cancels Fayette voters. This is political posturing.

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11/10/2021**C. Garcia of DeKalb County**

I do not favor the redistricting plan. For a process not to be advantageous to either party a no-partisan committee needs to head it.

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11/10/2021**J. McCoy of DeKalb County**

I am appalled at the rushed process and a Senate map that fails to reflect the growth in minority population in GA, and fails to reflect the even partisan split in the state shown in the 2020 elections. I hope the General Assembly map and Congressional will be more fair, more competitive, and more representative of the actual population of Georgia.

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11/10/2021**W. Reed of Fayette County**

Do not redistrict the voting boundaries. They are working fine for our representation. Leave it as it and stop the politicking!!!

---

11/10/2021**B. Gibbs of DeKalb County**

I totally echo the following comments that were previously submitted: Gerrymandering is manipulating the boundaries of an electoral constituency to favor one party or class. Unfortunately, the Georgia redistricting map meets this definition. District lines should be drawn fairly and with a transparent process. It's time for an independent commission.

---

11/10/2021**M. Chenoweth of DeKalb County**

DO NOT eliminate any GOP MAGA districts. Period - full stop. As a citizen of GA i will NOT tolerate a Republican In Name Only effort to stifle or push out of office Conservative representatives who support eliminating Dominion machines, ending mass-mail in ballots, or who supports investigating the MOST corrupt election in GA history. Names have been taken - and anyone redrawing maps to eliminate those seats WILL be primaried out of office, and investigated with the full power of We The People! You work for us, AT OUR PLEASURE. Misbehave and YOU WILL be removed from office!

---

11/10/2021**A. Biancardi of Cherokee County**

Please vote NO on redistricting for Cherokee County and all other conservative counties. Our family moved from NY to escape Democrat policies and ways of thinking. We chose to move to a RED county and state. Please respect our conservative values and beliefs.

---

11/10/2021**C. Henson of Coweta County**

Please reconsider the unfortunate redistricting map that has been presented. I live in Northern Coweta County and one of the reasons I recently moved here was to get away from a county with liberal representation. The population of Coweta is very conservative, yet you want us to move into a district with Fulton County, which is a predominantly democratic area. By doing so, you are stopping the voice of the people and instead putting Northern Coweta County in a district where they will neither care nor listen to our concerns and interests. Please do not allow this to happen. We don't need further turmoil in the state. Thank you.

---

11/10/2021**J. Rosenfelt of DeKalb County**

Dunwoody is a very close knit, cohesive community. We have been in the same House District for more than a decade. Our population is still small enough to be kept together. Please keep us together as a community of interest. Thank you!

---

11/10/2021**C. Martin of Fayette County**

Fayette County is such a small county and I can't even comprehend how you would even consider splitting it into four districts! I have been a citizen of Fayette County for 26 years and this redistricting will totally dilute our representation. I certainly this doesn't pass.

---

11/10/2021**B. Levy of DeKalb County**

I have been a Dunwoody resident for 33 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative. There is no reason to split us up since our population is well under the ideal size of a House district. For reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). The Democratic Caucus map keeps Dunwoody together. Therefore, I ask you to either make changes to the committee map to keep Dunwoody together or approve the Democratic Caucus map. Respectfully submitted.

---

11/10/2021**K. Carroll of Fayette County**

It is painfully clear what is going on here. Why else would Ralston , who has the ability to prevent this , not stop this redistricting? We are no longer republican if this happens. Too many underhanded things going on.

---

11/10/2021**B. Hopkins of DeKalb County**

Gerrymandering is manipulating the boundaries of an electoral constituency to favor one party or class. Unfortunately, the Georgia redistricting map meets this definition. District lines should be drawn fairly and with a transparent process. It's time for an independent commission.

---

11/10/2021**P. Wilder of Fayette County**

Fayette County is a small county and it is unbelievable that you would split it in four districts! I have been a citizen of Peachtree City for 36 years and this redistricting will totally dilute our representation. Please reconsider this decision.

---

11/10/2021**S. Brown of Fayette County**

I spoke to on Monday. I object to you splitting Peachtree City between THREE HOUSE DISTRICTS, Fayetteville and Fayette County being split into FOUR HOUSE DISTRICTS, and Coweta being "gutted" into 5 districts. Other cities complained too. Your plan is horrible for every race, creed, political party and special interest group. We are not the



only ones complaining. The population of Fayette County is just under 120,000. You could divide the county into two House Districts with a "zigzag" line to equalize whatever racial, ethnic or other criteria, with Peachtree City intact in one district, Fayetteville intact in the other. Tyrone and Brooks can be intact. Just two House Districts in the county! WHY GUT FAYETTE COUNTY? WHY GUT COWETA COUNTY? Why gut any of the other cities that complained on Monday? Isn't keeping cities intact YOUR priority? I'M SURE THERE ARE WAYS TO DO IT AND FOLLOW ALL YOUR PRIORITIES. YOU NEED TO FIND A BETTER PLAN FOR FAYETTE, COWETA and the others.

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**11/10/2021T. Stephenson of Bartow County**

If you continue forward with redistricting Bartow to make my representative Marjorie Taylor Green I will never,EVER, vote REPUBLICAN AGAIN

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**11/10/2021K. Miller of Forsyth County**

We have lived in Forsyth County for over 30 years. Our little pocket of south Forsyth, old Alpharetta Road between 400 and 141, is still rural in character. We are zoned agricultural residential and politically, we're mostly conservative. We are dismayed to see that your proposed redistributing will carve out our little corner of south Forsyth and move it from our Forsyth representation (District 25 and 27) and lump us in with north Fulton County. We live in Forsyth. We do business in Forsyth. Our medical teams are in Forsyth. PLEASE don't deprive us of our Forsyth representation!!! Let us remain in Todd Jones' and Greg Dolezal's districts. Please.

---

**11/10/2021E. Koons of Fayette County**

I have been a resident of Fayette County since 1972. I am against the redistricting of Fayette County into four minority parts of larger districts outside of Fayette County (South Fulton, Coweta, Henry, Spalding) based on population. This achieves nothing other than to weaken/dilute the voice of Fayette County voters.

---

**11/10/2021E. Clymer of DeKalb County**

Please slow down the process for approving house and senate maps. The public has not had time to review, understand, and comment on the maps that are actually being voted on. We want to make sure the maps are fair meaning they better represent the diversity of Georgia voters.

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**11/10/2021C. Sandstrom of Fulton County**

This is gerrymandering, and it is illegal. Unfortunately, political manipulation isn't. Redistricting should not be used for retribution, by gaming while the ball is in one party's possession. That only breeds more Us vs Them mentality that creates more discord and distrust, while nothing gets done in the best interest of the people. Voters can see, even in spite of the bread and circus timing of this undertaking, hurrying through while Georgians celebrate the World Series. The public has not been allowed sufficient time and discussion for meaningful input. Please vote no on these maps. Instead, insist that our representatives change the redistricting process, creating one that requires and values real transparency, equitable voice, and includes non-partisan representation. For government to work, voters need to trust their representatives and believe that their voices will be heard. This does not do that.

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**11/10/2021A. Hughes of DeKalb County**

I think that the public needs more time to study the map. The one I have seen was viewed by the Princeton Gerrymandering group (non-partisan) and they gave it an F for fairness. GA is nearly 50-50 partisan split, but this map will result in a 33-23 split with only 1 competitive county. THIS IS NOT A FAIR DISTRIBUTION!

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**11/10/2021J. Gilmore of Fayette County**

We do not see any merit in the proposal to split up our county. Fayette county knows what we want for ourselves and do not need surrounding counties input to make our choices for us.

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**11/10/2021M. Spence of Forsyth County**

Another comment, I just realized that Todd Jones will no longer represent me and that I will be moved to Angelika Kaushe's District. For a person that has voted Conservative her whole life, this is a slap in the face. This is a terrible move by those that are supposed to represent "we the people."

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**11/10/2021D. Fisher of Gwinnett County**

I live in the City of Peachtree Corners, a city that currently is represented by a single Representative, recognizing our community of interest. Under your new map, 5 precincts, including the one that I live in, are being cut off from the rest of my city and tacked on to a District that sits in squarely in Fulton County. I know that one of the principles of your map drawing was to respect County and city lines. I am asking that you find a way to return the 5 Peachtree Corners precincts to sit with the rest of our city so that our city can have a single, focused voice as it is a strong community with unique concerns.

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**11/10/2021S. Huckaby of Fayette County**

I have been a Fayette County resident for over 40 years. There is no reason to divide Fayette County into 4 districts. The majority of the populations will be outside of Fayette County which will dilute the votes of our people. You were elected as our representatives. The redistricting should reflect the will of the people.

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**11/10/2021M. Spence of Forsyth County**

I am opposed to the redistricting of Forsyth County. Sen. Dolezal currently represents me and with the redistricting Michelle Au will now represent me. I will have no Republican Representation in the GA Senate, or on a national level since Bourdeaux and Warnock are current officeholders. Conservative Forsyth is being liberalized by Gwinnett and North Fulton, it doesn't seem fair and could hurt Republicans running for office in the long run.

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**11/10/2021M. Franklin of Fayette County**

Please do not redistrict Fayette County. It makes no sense to have residents outside Fayette County voting on issues that only concern those within our County. If your only goal is to dilute the voting pattern in our county, then you do not deserve to serve in your position. You must serve the residents that elected you, otherwise you won't be serving when future elections come around. I strongly encourage you to vote against this redistricting recommendation.

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**11/10/2021R. Knowles of Fayette County**

I have lived in Fayette County since 1997. I strongly disagree with the new redistricting for Fayette County. It will dilute our votes and create other issues. Thanks

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**11/10/2021M. Boyens of DeKalb County**

I object to the drawing or redistricting maps that blatantly ignore fair representation for the increasingly diverse population of the state. I also object to the speed of approving both the senate and house maps, leaving inadequate time for public review, understanding and comment. The non partisan Princeton review rates your maps a failure of objectivity and fairness. Of course, that is what the country has come to expect from Republican control of anything.



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**11/10/2021C. Kegley of Fayette County**

I have been a Fayette County resident for over 40 years. There is no reason to divide Fayette County into 4 districts. The majority of the populations will be outside of Fayette County which will dilute the votes of our people. You were elected as our representatives. the redistricting should reflect the will of the people.

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**11/10/2021S. Maguire of DeKalb County**

This redistricting effort is clearly an effort to water down certain individuals' votes. Any effort to change districts should be based upon the following: compactness; contiguity; equal population; preservation of existing political communities; partisan fairness; and racial fairness. Please behave in an honorable fashion and respect each individual's right to have his/her vote counted equally and ensure that any redistricting is done in a fair and equitable manner. BTW, not that it should matter, but for additional context, I am a middle-aged Christian Caucasian who votes in every election.

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**11/10/2021K. Rexhausen of Jasper County**

Raised in Georgia by a true Atlantan born a Grady. I have lived in various counties including Gwinnett. The redistricting should reflect the will of the people. It is clear, the will of the people has been spoken. Stop this redistricting.

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**11/10/2021N. Murphy of Coweta County**

The proposed redistricting of Coweta County is not in the best interest of the county or the people it will effect. I did not moved here 30 years just to be moved back to Fulton County. You were elected as representatives, for we the people and we DONOT want any part of redistricting to South Fulton.

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**11/10/2021C. Morgan of DeKalb County**

I have been a Dunwoody resident for 33 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative. There is no reason to split us up since our population is well under the ideal size of a House district. For reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). The Democratic Caucus map keeps Dunwoody together. Therefore, I ask you to either make changes to the committee map to keep Dunwoody together or approve the Democratic Caucus map. Respectfully submitted.

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**11/10/2021R. Morgan of DeKalb County**

I have been a Dunwoody resident for 33 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative. There is no reason to split us up since our population is well under the ideal size of a House district. For reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). The Democratic Caucus map keeps Dunwoody together. Therefore, I ask you to either make changes to the committee map to keep Dunwoody together or approve the Democratic Caucus map. Respectfully submitted.

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**11/10/2021D. Wilson of Coweta County**

Please VOTE NO on the redistricting. Coweta county is a conservative county. Coweta County representation does not need to be in Fulton County. We need to be represented by someone who lives in Coweta County. I do not approve the current version of the house redistricting map! I am a resident of Coweta County, and I do not approve of the way the committee has carved up Coweta and Fayette counties. The districts now give too much weight to

Atlanta interests, and will result in the interests of long time residents of North Central Georgia being swallowed up in big city politics! We have NOTHING in common with Fulton County, as anyone who has visited the small towns and surrounding countryside in Fayette and Coweta counties can plainly observe. The map, as-drawn, in no way will represent my interests as a small town Georgian. Please, do not do this. Thank you.

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**11/10/2021A. Matkovich of Coweta County**

The proposed redistricting in Coweta and Fayette counties does not represent the best interests of the people of these counties. As our elected representatives, you should do what is best for the people of these areas. We want to maintain our current districts. Don't play politics with our districts.

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**11/10/2021D. Dehnel of Peach County**

im very concerned as to why we would agree to going from 103 rep areas to 97??? it seems as if we conservatives are continually giving more ground to the progressive left!! please stop!!

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**11/10/2021T. Merritt of Oconee County**

I have been born and raised in Georgia. I have lived in various counties including Gwinnett. The redistricting should reflect the will of the people. It is clear, the will of the people has been spoken. Stop this redistricting.

---

**11/10/2021T. Merritt of Oconee County**

I have been born and raised in Georgia. I have lived in various counties including Gwinnett. The redistricting should reflect the will of the people. It is clear, the will of the people has been spoken. Stop this redistricting.

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**11/10/2021M. Cox of Madison County**

I am opposed to the current redistributing maps as drawn and submitted. It appears to be Gerry meandered to force out a Republican who rightly opposed the voting machines used And appears to be retribution.

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**11/10/2021S. Kudro of Cherokee County**

To clarify, my previous comment refers to the plan to redistrict parts of Fayette and Coweta counties represented by Republican Philip Singleton. I am opposed to the redistricting of this area for the reasons stated in my previous comment--it will essentially force out a Republican and ensure that the seat goes to a Democrat.

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**11/10/2021A. Volle of Fayette County**

I strongly oppose this redistricting. Most of us have moved here from far and wide because of it being smaller county. This action would dilute our voices and needs to be brought to a general election, which will reveal a majority voting against it

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**11/10/2021S. Kudro of Cherokee County**

I am strongly opposed to this redistricting. The redistricting is not only an abuse of the power of the speaker, it's destructive to the aims of the Republican Party in Georgia because it almost surely simply hands at least one currently Republican seat to the Democrats, probably more.

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**11/10/2021J. Searcy of Cherokee County**

The new redistricting is an overreach of power and does not directly reflect the needs and our community as a whole. Please don't fix something that clearly isn't broken.

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**11/10/2021D. Bryant of Fayette County**

Leave Fayette County in its current district. I am life long residence of Fayette County. My family and I specifically object to any actions that may lead to or require redistricting. Let me remind you that you are an official whose responsibility is to represent the position of your constituents and I am one.

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**11/10/2021J. Greenberg of DeKalb County**

Please slow down this process so that the public has time to read, understand, and comment on these redistricting maps.

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**11/10/2021L. Ostapower of Coweta County**

I am highly opposed to the county redistricting that is currently in the works. This is a blatant overreach in power.

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**11/10/2021A. Payne of Gwinnett County**

I strongly object to the obvious attempt at gerrymandering HD105. Hog Mountain is not of interest in this district nor representative of historical boundaries.

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**11/10/2021K. Lawler of Fulton County**

(3/3) Both the committee and caucus maps lack competitive districts. The committee map has only 1, while the caucus map has only 3. The benchmark indicates that up to 7 are possible. The reason that the committee map receives a grade of F is that the partisan lean is clearly outside the benchmark and it only has 1 competitive district. The caucus map gets an A because it is well within the benchmark and has more competition. Finally, Sen. Cowser asked a question about how Princeton deals with county splits. The maps in the benchmark are not allowed to exceed the number of split counties in the existing map, 37. The idea is to not make split counties any worse in the new maps.

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**11/10/2021K. Lawler of Fulton County**

(2/3) Looking deeper within this range, 88% of the maps have 1-3 more districts for Republicans. The map proposed by the committee projects a 5-district advantage for Republicans. This is outside the benchmark range. In fact 99% of the million maps have fewer Republican districts. Imagine a proposed map that is 27R-28D, or +1 district advantage for Democrats. The committee would no doubt consider that an outlier. The committee's map at +5R is as far outside the benchmark range as a +1 Democrat map would be. Contrast this with the map proposed by the Democratic caucus. It has a +3 advantage for Republicans. It is well within the 98% range of the benchmark.

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**11/10/2021K. Lawler of Fulton County**

(1/3) This is to clarify the meaning of the benchmarks provided by Princeton Gerrymandering Project and Fair Districts GA. Benchmarks are created by drawing 1 million simulated maps that comply with redistricting criteria but without any political intent. The purpose of the benchmarks is to discover the natural political preferences of Georgia. The benchmarks use political data from the 2018 Governor, 2020 Presidential, and 1 2021 Senate runoff elections. These statewide elections show that Georgia is a swing state; statewide elections are close to 50-50. But

that doesn't mean that district maps should be split evenly, because of the clustering of Democrats and Republicans. The benchmark for State Senate reveals that the natural distribution of districts within 1 million maps should be 24-28 districts for Democrats and 28-32 districts for Republicans. Thus, Republicans appear to have a natural advantage of 0-4 districts because 98% of the million maps fall within this range.

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11/10/2021**K. Gonzalez of Fayette County**

I want to express my strong disagreement with this redistribution plans for Fayette county. I am so disappointed at this committee, for even considering it, and for the apparent secrecy and rush job to get this done. I ask, does your neighbor tells you how to cut your grass, or chooses the color you must paint your home, so in what world do non-residents make decisions for the residents of a county...! This only make sense if the primary goal is to dilute my vote, try to silence me, well please, do not allow it, because this one will not be a proud moment when you look back 10 years from now. Sincerely, Kenneth Gonzalez

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11/10/2021**S. Coleman of Gwinnett County**

Dear Representative Rich I strongly disagree with your redistricting Map Showing Hog Mountain in HD105 hog Mountain has no interest in HD105 Your district should represent you demographically by a certain percent Sir.

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11/10/2021**K. Self of Fayette County**

Please vote no on restricting. Our votes do not need to be diluted

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11/10/2021**M. Ball of Fayette County**

VOTE NO TO REDISTRICTING FAYETTE COUNTY! Our ideas do not align the counties you want to redistrict our county with. Vote NO!!!

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11/10/2021**B. Wood of DeKalb County**

True representation reflects the voices and will of the residents. Redistricting to exert control of votes limits all voices and the privilege to vote and be represented. Let us not lose this right and freedom.

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11/10/2021**K. Self of Fayette County**

Please vote no on restricting. Stop going against your constituents! Your voters will remember this. Keep Fayette County a Republican stronghold

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11/10/2021**R. Brennison of Fayette County**

My husband and I are against the redistricting of Fayette County. We want the representation for the county to come from the county.

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11/10/2021**S. Clymer of Gwinnett County**

Dear Representative Rich, I am very familiar with the current HD 105 and I hardly recognize the proposed change. You are my HD 97 representative and your recent newsletter stated that District Maps must "consider traditional principles of redistricting such as ensuring communities of interest are represented." Hog Mountain in HD105? No! Grayson should stay as part of the community of interest!



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11/10/2021**M. Froehlich of Coweta County**

Please vote NO on the redistricting. Coweta county is a conservative county. Coweta County representation does not need to be in Fulton County. We need to be represented by someone who lives in Coweta County.

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11/10/2021**R. Henley of Cherokee County**

Dear Representative, I do not favor the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement. A  
Concerned Cherokee County Resident

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11/10/2021**A. Branco of Cobb County**

Dear Rep. Bonnie Rich, I do not favor the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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---

11/10/2021**R. Cook of Fayette County**

If what I'm hearing is true about a vendetta about a pastor's sexual abuse case to redistrict so that fayette County votes will no longer count is just as bad. Leave the citizens of fayette County out of any personal issues. We have our own issues to deal with. Disgraceful at the least for both the crime and the redistricting.

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11/10/2021**M. Hunnicutt of Fayette County**

Not happy with redistributing proposal. It will dilute Fayette residents votes. Why should Fulton, Henry, Coweta and whoever, represent me? I purposely chose not to live in these other counties, particularly Fulton and Henry for a reason. Their vision for Ga is not mine and under this proposal, my voice will not get heard. Leave Fayette alone!!!!

---

11/9/2021**M. Bennett of DeKalb County**

How can you have a redistricting process that is fair when it is being decided solely by the majority party? If you were confident about this process you would have set up a committee that is either non partisan or equally split amongst Democrats and Republicans. You took the opportunity to make decisions while the entire city came

together to support our home town team on their major victory, I mean who does that? The one thing we can agree on is celebrating the Braves and you took advantage of us coming together to create more laws to divide us.

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11/9/2021**C. Gilley of Fayette County**

I strongly disagree with the new redistricting for Fayette County. It will dilute our votes. Please listen to your constituents and stop this now.

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11/9/2021**P. Storey of Coweta County**

I disagree with this proposal, it appears someone is trying to make sure my vote won't count. Highly disappointed in our elected officials who seem not to care about their constituents.

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11/9/2021**S. Wilson of Fayette County**

I do not approve the current version of the house redistricting map! I am a resident of Fayette County, and I do not approve of the way the committee has carved up Coweta and Fayette counties. The districts now give too much weight to Atlanta interests, and will result in the interests of long time residents of North Central Georgia being swallowed up in big city politics! We have NOTHING in common with Fulton County, as anyone who has visited the small towns and surrounding countryside in Fayette and Coweta counties can plainly observe. The map, as-drawn, in no way will represent my interests as a small town Georgian. Please, do not do this. Thank you.

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11/9/2021**R. Butler of Paulding County**

I do not agree with the redistricting plan for Cherokee County because it does not represent the citizens that reside there. Changing district lines for reasons other than for the benefit of the people that live there is unacceptable. We vote for people that will represent our interests, not dictate to us.

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11/9/2021**K. Swindall of Fulton County**

I do not agree with the redistricting plan for the state of Georgia as it currently is presented. As an example, under this new plan, the lines for Rep Phillip's district will change from a 80-20% Republican majority to a 70-30% Democrat majority. It is imperative that the district lines be drawn to accurately reflect the community of Cherokee County, which is 80-20% Republican. This is an injustice that is contrary to the will of the majority of the people in this area and can be easily corrected by drawing the lines correctly. We, the people, are rising up to support elected officials who vote in accordance with the beliefs of their constituents. We also work diligently to find people to run against those who do not. We are not only concerned with Cherokee County, but with State House, Senate and Congressional districts throughout the state. Thank you for your public service and for your work in assuring that elections in Georgia will be run in a fair manner for its citizens.

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11/9/2021**M. Farr of Fulton County**

I do not favor the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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**11/9/2021S. Wood of Gwinnett County**

I oppose the maps as currently drawn particularly changes in HD 105 since Hog Mt is not a community of interest.

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**11/9/2021M. Incata of Cobb County**

David Ralston, you ARE handing over Philip Singleton's district to Democrats because he stood up to you! You are willing to hurt Georgians because of your vendetta? And is it also true that you have the power to step in and exert power over the Parole board that let a child pornography felon go free 990 years before his parole, but won't lift a finger? Are you insane or just so arrogant that you have forgotten who put you in power? You should certainly be ashamed. I oppose your redistricting plan. Do better for the Republicans you serve.

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**11/9/2021K. Geer of Cherokee County**

Please reconsider the proposed redistricting plan for Cherokee County in which the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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**11/9/2021L. Stinson of DeKalb County**

I have lived in Dunwoody for 13 years. I do not agree with the current redistricting map of HD79 as it is currently proposed because it undermines community that we have worked hard to create in the decade or so that we have been a City and in the same house district. Dunwoody is a very close knit, cohesive community. We still have few enough constituents here to be kept together in the same HD. It does not seem helpful to the taxpaying constituents or to the City at large, DeKalb, or metro areas to move us to a new district. It also does not seem customary or reasonable to do so, considering the above stated information. Please keep us together as a community of interest. Thank you for your time and for supporting the voices in Dunwoody and DeKalb.

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**11/9/2021K. G of Coweta County**

As a resident of this district, I am absolutely livid over this. Districting us into a 80% Democrat controlled district silences the voices of these voters. Singleton is a great rep. As a registered Independent for 30+ years, I voted a straight red ticket this year for the first time ever. My vote was earned by the Republican Party, which is what I require. If this redistricting occurs, I will simply not vote again. I will be taxed without representation. Republicans control GA Congress, SOS, Governor, Lt. Gov, and AG. Why are you giving any districts to the SOCIALISTS!? Disgraceful. Would Democrats give you districts? No they would not. They're playing smash mouth and you're playing footsies.

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**11/9/2021W. Mullins of Fulton County**

Dear Representative- I'm taking the time today to write to you that I do not favor the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority which is excessive. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement. Thank you!

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**11/9/2021K. Muldowney of Fulton County**

I do not support the redistricting of district 71. It is clearly retribution for Rep. Phillips support of a forensic audit of the 2020 election results. Why are we so scared of performing an audit? A corporation that produces 500 billion in GDP, as dose the state of Georgia, is subject to formal audits annually. The majority of voters do NOT Trust the 2020 election. Do what you were elected to do support the voters and prove our system is sound.

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**11/9/2021T. Wilson of Forsyth County**

David Ralston, Is it true that you are handing over Philip Singleton's district to Democrats because he stood up to you? You are willing to hurt Georgians because of your vendetta? And is it also true that you have the power to step in and exert power over the Parole board that let a child pornography felon go free 990 years before his parole, but won't lift a finger? Are you insane or just so arrogant that you have forgotten who put you in power? You should certainly be ashamed. I oppose your redistricting plan. Do better for the Republicans you serve.

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**11/9/2021A. Green of Coweta County**

I do not approve of the redistricting layout of Coweta and Fayette counties. Having lived in Douglas, Fulton, Cobb, and now Coweta counties, I have a pretty good idea of what makes each unique, good qualities and bad. Forcing a governmental merge of representation from Coweta and Fulton counties is a clear misrepresentation of the majorities of people in both locations. STOP this manipulation and let the voters have an accurate voice for their beliefs and interests. OR be replaced.

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**11/9/2021K. Agbebiyi of Fulton County**

My name is K Agbebiyi MSW and I live in Midtown Atlanta. I am the Georgia Director of Policy and Movement Building at URGE: Unite for Reproductive and Gender Equity. URGE builds power and sustains a young people's movement for reproductive justice by centering the leadership of young people of color who are women, queer, trans, nonbinary, and people of low-income. In Georgia, and other states across the South and Midwest, URGE organizes our communities, provides a political home for young people, advocates for meaningful policy change, and shifts culture, working in states where the challenges and opportunities are greatest. I'm writing in opposition of the proposed redistricted maps. Not only do the maps not accurately represent the diversity of our state, and the growing minority populations, the process has been swept through with minimal opportunities for public feedback and approval. It is imperative that the young people that URGE organizes with (who are Black, Latinx, LGBTQIA+,

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**11/9/2021M. Sarkisian of Cherokee County**

I'm 100% opposed to the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting gamesmanship does not accurately represent our community and everyone knows it. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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**11/9/2021H. Klatt of Cherokee County**

I am NOT in favor of the redistricting of Cherokee County. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. Your jobs are to serve we the people! Do you job or find one enjoy doing more. Quit playing people against people!

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11/9/2021**M. R of Fulton County**

Why are you taking vindictive action towards current representatives and trying to draw their constituents away from their representative? Voters didn't ask you to do this. This behavior is malicious, obvious, and illogical. Redraw HD71 as it stands today, instead of flipping it for your corrupt political interests.

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11/9/2021**M. Isbell of Fulton County**

My children attend Cherokee County schools and I want to express my concerns about "redistricting" Cherokee County. There is no business, community or civic purpose for this, it appears to be politically motivated and punitive toward Rep Phillips to "flip" the seat for a political party. We should NEVER allow our elected officials to use political maneuvering for the purpose of power, you are elected to serve the community and constituents so that each individual is represented and their inalienable rights are preserved. Please do not use redistricting as a strategy to silence and divide. You were elected for a reason and by using your elected position judiciously and responsibly, you establish a solid record so that you can be re-elected. If not, you should plan to be replaced. Thank you for listening to my concerns.

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11/9/2021**R. Quillian of Fayette County**

PLEASE do NOT approve this redistricting of Fayette Co. Our needs and concerns vary greatly from those of surrounding counties. That is one reason I moved here. Do not allow David Ralston to negate my vote and harm my county. We have NOTHING in common with Fulton, Henry, Spalding or Coweta. This is nothing but a cheap power play and I want no part of it. STOP THIS CRAZINESS!!!

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11/9/2021**K. Hines of Fulton County**

I am not in favor of the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting scheme does not accurately represent our community. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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11/9/2021**A. Ellis of Coweta County**

Do not approve the current version of the house redistricting map! I am a long time resident of Coweta County, and I do not approve of the way the committee has carved up Coweta and Fayette counties.

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11/9/2021**P. Wiseman of Walton County**

Here is what seems to be the problem for all legislators. Ralston is buying you off. So we are going to be sure Ralston has no money from big donors to buy you off with! We the people should be the only voice in your ear. Drop mic!!

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11/9/2021**J. Christ of Fayette County**

Do not approve the current version of the house redistricting map! I am a long time resident of Fayette County, and I do not approve of the way the committee has carved up Coweta and Fayette counties. The districts now give too much weight to Atlanta interests, and will result in the interests of long time residents of North Central Georgia being swallowed up in big city politics! We have NOTHING in common with Fulton County, as anyone who has visited the small towns and surrounding countryside in Fayette and Coweta counties can plainly observe. The map as-drawn IN NO WAY will represent my interests as a small town Georgian.

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**11/9/2021W. Gula of Fulton County**

Please stop the unfair redistricting of Georgia House Representation Phillip Singleton House District in Coweta County 73. I have lived in Fulton County for 28 years, and I am a strong supporter of House Representative Phillip Singleton. Phillip is dedicated to election integrity in Georgia's elections. He is a brilliant representative and represents all Georgia voters working to ensure their vote counts and is not nullified by an illegal vote. Georgia voters need this reassurance since so many voting irregularities occurred in 2020. This is a HUGE confidence issue of tens of thousands of Georgia voters and a full forensic audit will build trust. House Speaker David Ralston is attempting to unfairly redistrict Rep Singleton out of his seat. The new redistricting moves the Republican from District 73 that has an 80-20% Republican majority to District 67 that has a 70 -30% Democrat majority. Please address this issue and stop this vindictive retaliatory action by David Ralston.

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**11/9/2021L. Ellis of Coweta County**

Vehemently AGAINST redistricting of Coweta and Fayetteville counties as currently proposed. Please vote against District 67 and let Coweta County residents have local representation.

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**11/9/2021W. Neal of Fayette County**

I am appalled that Fayette County is being carved up into four different districts, none of which include a majority of Fayette County citizens. While i realize that no redistricting map is going to be perfect, this proposal would in effect give our county no real representation. Please reconsider!

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**11/9/2021S. Hobgood of Muscogee County**

Do not redistrict Coweta and Fayetteville counties as currently proposed. Please vote against District 67 and let Coweta County residents have local representation.

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**11/9/2021J. Barnard of Fayette County**

Transparency in government is the goal so that citizens understand what is going on. Recommend that the committee align Fayette County alone rather than including parts of 2 or more other counties. Political bias for the purposes/good of a particular party is wrong. For the good of the people not a party.

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**11/9/2021K. Langford of DeKalb County**

As a 7.5 year resident of Dunwoody I have had the opportunity to take part in our city's growth as a vibrant community. Please keep us whole, don't split us. With just one House District we will continue to forge alliances that are in the best interests of all members of our community. Thank you.

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**11/9/2021D. Spransy of DeKalb County**

The clearly gerrymandered district proposals in DeKalb county do not make any sense. Communities are split up across the board, and people who live just a few miles from one another going east and west may be separated by an entirely different district. Meanwhile, many people who live many miles apart in north and south DeKalb end up in the same district. Additionally, redistricting should be led by a non-partisan independent body, not whichever party happens to be in power at the time in the state legislature. These districts are clearly drawn for partisan advantage, and it is shameful.

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**11/9/2021J. Schulman of DeKalb County**

I have been a Dunwoody resident for the last 13 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative and there is no reason to split us up since our population is well under the ideal size of a House district (for reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). I would request that you either make changes to the committee map or approve the Democrats' map that keeps community together.

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**11/9/2021A. Birdsong of DeKalb County**

Redistricting maps should keep communities together. Districts should match closely with city and county borders, and even keep school districts together when possible. Districts should be as compact as possible. Districts should be fair to all population groups and not dilute votes of historically excluded groups. Districts should be competitive and allow voters to choose their leaders. Districts should not be gerrymandered. The current proposed redistricting maps are very gerrymandered and very biased, they do not keep cities and counties together, and are obviously drawn to favor one group over another.

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**11/9/2021P. Olson of DeKalb County**

The proposed Republican map is clearly gerrymandering to obtain advantages in a majority of districts. The state is watching. This won't be forgotten.

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**11/9/2021M. Greenwald of DeKalb County**

Why is Dunwoody being split? This move does not serve our community and seems to be blatantly political. Redistricting is intended to adjust for population changes. The city of Dunwoody could and should remain as an intact House District. We will not forget what is being done.

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**11/9/2021D. Campbell of Fayette County**

What a blatant act of retribution! Gerrymandering to dilute our vote. Fayette County representation should reflect the interests of Fayette County! Keep your hands off our vote! We are watching!

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**11/9/2021S. Henley of Miller County**

House Speaker's retribution against Philip Singleton for joining a lawsuit to correct the illegal elections that have been carried out in past elections by attempting to redistrict Rep. Singleton out of his seat is appalling and unethical. You, Bonnie Rich, as chairman of the redistricting effort have power to correct this injustice that goes against the will of the people. May I remind you and your colleagues you are a servant of the people of Georgia. I insist that the lines be redrawn more fairly. 1Thess 5:15 See that none render evil for evil unto any man; but ever follow that which is good, both among yourselves, and to all men. Prov 13:20 HE THAT WALKETH WITH WISE MEN SHALL BE WISE: BUT A COMPANION OF FOOLS SHALL BE DESTROYED.

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**11/9/2021M. Bussey of DeKalb County**

Redistricting should be handled by an independent, nonpartisan agency - always. The current Republican proposals are designed to suppress the power of some voters and enhance that of their current supporters. This is simply wrong, and wrong-headed. Times and voters change. By not having this process resolved by an independent agency the Republicans are begging Democrats to respond in a similar anti-democratic fashion when they are in control. This is not what democracy, and one-vote-one-person are about.



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**11/9/2021R. Cobb of Coweta County**

The proposed division of 30,000 north Coweta County residents into 2 majority-south-Fulton-County districts is a complete travesty and should not stand. This fast-growing area will be left with no voice and, in essence, no representation in state issues for the next 10+ years. Republicans in charge, do the right thing and stop your political petiness. Do what's right for the people!

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**11/9/2021R. D of Fulton County**

I would like to echo and amplify this comment contributed by another citizen: "When a party loses an election, as Republicans did in both Senate races [and multiple local seats across the state] this past year, it is a signal to examine the direction and tone the party has taken that lost many voters. Instead this redistricting is a desperate attempt to 'game' the system and has obviously bypassed the processes for public comment and the principles of fairness. Why not instead invest your efforts in bolstering rather than undermining representative democracy?" Please stop efforts to retain power unfairly, and focus instead on actual platforms that Georgia voters actually support. Thank you.

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**11/9/2021R. D of Fulton County**

I would like to echo and amplify this comment submitted by a fellow citizen: "If Democrats have the time and ability to submit their maps weeks out before 'due date' for review, analysis and public feedback, anything submitted by Republicans should be subject to the same. To those who submitted last minute: Your job as a representative is to fairly--and transparently--serve the people." I do not believe the people are being fairly or transparently served by the Republicans' contributions to this process. Thank you.

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**11/9/2021H. Allgood of Stephens County**

Please do the right thing and draw the lines fairly!! To punish the Rep that we're doing the right thing in calling for fixing the 2020 election!! We will never win another election if the lines are not done fairly!! Thanks, Harriett Allgood

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**11/9/2021R. D of Fulton County**

I add to my previous comment – please vote no on the Republican-proposed maps.

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**11/9/2021R. D of Fulton County**

I want Georgia to set a high standard and to be an example to other states for ensuring fairly drawn and competitive districts which provide voters the best chance to elect people who are representative of their district's needs and desires. Carving cities and communities so that residents have multiple representatives dilutes their voices and benefit to their district. The public has not been provided sufficient opportunity for review and input; the input that has been given appears to be disregarded. Finally, the GOP-offered maps reduce competitiveness in multiple districts, blatantly biasing outcomes to Republican candidates. This is gerrymandering and it is wrong. I urge maps that promote community preservation and simplification of representation; I support measures that ensure fair representation. What I've seen from this committee so far respects neither principle. I ask that you listen to the public and honor our input. Thank you.

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**11/9/2021E. Judd of Cherokee County**

Cherokee County NEEDS four (4) house district seats and one (1) senator seat in the county within our county border. This is imperative to Cherokee County residents!

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**11/9/2021D. Strasburg of Coweta County**

I urge you not to redistrict north Coweta county as proposed. Other than taking away north Coweta's district 71's representation, it is just plain wrong and appears to be motivated by political retribution rather than resident's interest.

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**11/9/2021K. Weinhardt of Fayette County**

What you have essentially done is completely dilute the voters of Fayette and Coweta counties on this proposed house map. Districts 65, 67, 68, and 69 all run north to south from Fayette or Coweta county. Each proposed district runs northward into Fulton County pulling in a chunk of a much more heavily populated geographic area. You have neutralized the will and the interests of the voters in Fayette and Coweta Counties. You have also dissected the district of Philip Singleton's district. I find it strange that you chose to destroy the district of one of the voices in the state legislature that called for a FULL INVESTIGATION of the 2020 presidential election in Georgia. Let's be clear. Hundreds of thousands of Georgia voters want a full investigation of the 2020 presidential election. Now you are proposing to eliminate Singleton's district and chop his county up into 5 pieces. The question GA voters want to know who it is that you serve.

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**11/9/2021D. Waldroup of Fulton County**

The redistricting for the Speaker to retaliate against Singleton is an abomination; the Speaker himself is something of an abomination as well. He needs to go.

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**11/9/2021L. King of Gwinnett County**

Don't redistrict to retaliate against Philip Singleton. I vote Republican, but I will not vote for corruption. Politics are being more exposed than ever. We see what you're doing, good or bad. You need to do what's right. You need to fix the GA parole board. You need to put the pedophile back in prison. 7 years does not equate to life in prison. If you're redistricting to keep the majority and not addressing these important issues, you don't deserve to be in politics.

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**11/9/2021T. Collins of Cherokee County**

This is an absolute outrage! Even though I am not a citizen of Coweta county, this affects every Georgian. This is being done as political retaliation, and is unacceptable in a Democratic Republic. Georgia is successful because of Republican leadership. Where is that leadership now?

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**11/9/2021L. Townsend of DeKalb County**

My family has been a resident of Dunwoody for over 12 years. We are best represented as a community/city together. Please reconsider the voting district to avoid splitting our city.

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**11/9/2021W. Kessler of Fayette County**

I do not support the redistricting of Fayette and Coweta County. This redistricting proposal will mute the voices of the citizens of Fayette and Coweta County. I will support any measure to remove David Ralston as Speaker should this redistricting be finalized.

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**11/9/2021A. Zupancic of DeKalb County**

I moved to Atlanta in 1965 when I was two years old. I've lived in north Georgia's Murray County, metro Atlanta's Fulton, Cobb, and Dekalb Counties, middle Georgia's Bibb County, and south Georgia's Glynn County. I currently live in Dunwoody, where I lived from 1975-1981 (graduating from Dunwoody High School) and where I returned to live with my husband in 2014. Dunwoody is a diverse but closely-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative and there is no reason to split the community - our population is well under the ideal size of a House district (Dunwoody's population is about 52,000 people, well within the ideal House District size for this round of redistricting). I respectfully ask that changes to the committee map be made to keep our community together (or alternatively, the map proposed by the Democrats be adopted). Thank you for your consideration of this request.

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**11/9/2021W. Huff of Fayette County**

Please do not gerrymander District 71 to co-mingle with Southern Fulton County. It makes no sense. Please leave District 71 as is.

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**11/9/2021M. Pichardo of DeKalb County**

I have been a resident of Dunwoody for over 15 years, I respectfully ask that you do not divide our city. All Georgia citizens desire a representative that knows and understands their community's issues. I ask again that you do not move forward with the action of dividing our community.

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**11/9/2021H. Sheth of DeKalb County**

As a Dunwoody resident and small business owner, I respectfully encourage you to reconsider the proposed map of splitting Dunwoody into two separate districts. Our community is small and very close, and we are truly best represented if we have one state representative and one state senator. Our population is small enough to keep us altogether and it just makes sense from a logistical and community involvement perspective. Regardless of our political affiliations, I have no doubt that Dunwoody is united in support for our community.

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**11/9/2021K. Chipman of Coweta County**

Why is anyone considering redistricting across County lines? The Republican Reapportionment Map takes two Coweta County voting districts across County Lines. One district will actually cross 3 County lines. How will the community's best interest be served by a Representative who is not a member of that community. Their focus will be on their community. Coweta County has vastly different needs from Fulton County. I am asking you all to vote NO on the Republican Reapportionment Map.

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**11/9/2021J. Cope of DeKalb County**

I am a Dunwoody resident for 10 years. Please reconsider the redistricting of Dunwoody into two districts. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative and there is no reason to split us up since our population is well under the ideal size of a House district. The Democratic Caucus map keeps Dunwoody together. Therefore, please consider either making changes to the committee map or approve the Democrats' map.



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**11/9/2021T. Crow of Coweta County**

I am against moving Northern Coweta County in Fulton County. I moved here 16 years ago because I like how the community is run. I do not want to be apart of Fulton County. Please consider this when voting on the proposed redistricting of Northern Coweta County.

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**11/9/2021J. Ziffer of DeKalb County**

Please reconsider splitting Dunwoody into two districts. While growing, Dunwoody is a small community that is working cohesively to enhance the community for existing and new residents. Breaking Dunwoody into two districts will impact the community feeling. As a 15-year Dunwoody resident and a 20+ year resident of DeKalb, I'm asking you to please reconsider this decision. Thank you.

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**11/9/2021S. Fraser-McConnell of Fayette County**

There is no reason to be dividing up Fayette county and putting pieces of it with other counties. Counties should remain intact unless they divide a county in pieces due to size, but then it should not be lumped in with neighboring counties. We vote, pay taxes, and pass rules, regulations, & laws for our counties and should be a single voting district.

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**11/9/2021C. McCranie of Cherokee County**

Dear Rep. Bonnie Rich, I do not favor the redistricting plan for Cherokee County. Under this new plan, the lines for Rep Phillip's district will reflect a 70-30% Democrat majority. This redistricting scheme does not accurately represent our community. The district lines must be drawn to accurately reflect the community of Cherokee County which is 80-20% Republican. You have the power to correct this injustice that goes against the will of the people. As you see daily, people are rising up to support elected officials who speak on behalf of their communities, and flipping seats of those who do not. We hope to be able to endorse you in the future rather than seek your replacement.

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**11/9/2021S. Huckaby of DeKalb County**

Dear Redistricting Committee, I have been a Dunwoody Resident for 17 years. I have watched our community grow from an unincorporated area into the close-knit community it is today. We share similar interests and goals for our city. In order to achieve our goals and interests, we should be kept together in one district. We have never had more than one House Representative and there is no reason to split us up since our population is well under the ideal size of a House district. Splitting us up will just make it harder for our community to achieve our common goals having to deal with 2 House Representatives. Please together by either making changes to the committee map or approve the Democrats' map.

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**11/9/2021A. Rose of Fayette County**

I live in Fayette County for a reason. Our county is being divided into four districts with each one of the four being a minority part of the larger district based on population is very upsetting to me and my neighbors Based on the proposed map, Fayette would be split into districts 68, 69, 73 and 74. The majority by population of those districts lies outside of Fayette County which dilutes the votes of Fayette county residents. No disrespect to other counties, but I do not think that what is best for Fayette County should be decided by residents of south Fulton, Spalding, Henry and Coweta counties. Please, you can do better.

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**11/9/2021S. Stanhope of DeKalb County**

First the Election Integrity Act and now this to stain the reputation and legacy of Georgia. To make our democracy work, voters need to believe that their voices will be heard. The proposed Republican districts silence the very voices that seek to change Georgia into a more inclusive, innovative community. Please vote against this.

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**11/9/2021A. Starnes of DeKalb County**

I am a Dunwoody resident of 16 years. I am also a small business owner in Dunwoody Village. Please consider keeping Dunwoody in one district. We are a close knit community that is undergoing major upgrades, and we would greatly benefit from united leadership. Our population number is well under what a typical district entails, and there is has never been more than one leader for our district. I love this community and would appreciate this consideration. Thank you.

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**11/9/2021S. Brown of Jeff Davis County**

The redistricting of Representative Philip Singleton's voting district is retaliation by Speaker of the House, Ralston. I spent 15+ years as a grassroots activist under Georgia's Gold Dome, served on several political committees, and served as a local elected official for eight years. I personally experienced and observed Ralston's activities. When, did the VOTERS of GEORGIA LOSE their RIGHT, without fear of retaliation of those in power, to hold accountable those who govern us? I watched representatives cower like wet, whining, dogs before Speaker of the House Ralston for years. Representative Singleton signed his name to a legal document asking for voter transparency for ALL voters; how many of you signed your full name to your comments? I respectfully ask, that this Committee conduct its redistricting deliberations in a non-partisan, non-retaliatory atmosphere, that speaks to the ethical and moral fiber of Georgia's legislators.

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**11/9/2021W. Fisher of DeKalb County**

I have been a Dunwoody resident for 33 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative. There is no reason to split us up since our population is well under the ideal size of a House district (For reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). The Democratic Caucus map keeps Dunwoody together. Therefore, I ask you to either make changes to the committee map to keep Dunwoody together or approve the Democratic Caucus map. Respectfully submitted,

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**11/9/2021J. Mashburn of Cherokee County**

Notice of Demand to Cease and Desist Interfering with the Will of the People of Cherokee County. Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent. This redistricting map is an INTENTIONAL assault on election integrity AND an attempt to disrupt the "Red Wall" of Cherokee County. Whoever supports this redistricting map obviously couldn't care less about election integrity (or the Will of the People) & will be exposed for being bought and paid for by special interest groups. The Map Trap is set. So, I strongly urge you to overrule Ralston; or, We The People will exercise all our God-given & Constitutional authority to remove every last one of you backstabbers from office. We The People are watching. We The People demand & expect you to preserve 4 House seats & 1 Senate seat within Cherokee County borders. You would do well to remember your oath of office & that you are there SOLELY to serve/do the Will of We The People.

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**11/9/2021M. Shuman of DeKalb County**

Please allow Dunwoody to remain as a cohesive city. We have lived in Dunwoody for 35 years- one district- one city. There is no logical reason for the new map!

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**11/9/2021A. Grace of DeKalb County**

If Democrats have the time and ability to submit their maps weeks out before "due date" for review, analysis and public feedback, anything submitted by Republicans should be subject to the same. To those who submitted last minute: Your job as a representative is to fairly--and transparently--serve the people. Do it.

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**11/9/2021T. Hughes of Chatham County**

Those of you that think this is rushed is clueless of the process. It should have been done months ago but covid delayed it. We would like to see the county-level maps. School board elections coming up and we saw the democrats in Chatham gerrymandered the dickens out of the proposed maps.

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**11/9/2021E. Disner of DeKalb County**

Dunwoody deserves to remain whole and represented by one person. Not split by the current restricting plan.

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**11/9/2021M. Wood of Thomas County**

I'm sorry to say that this new map is a travesty on the democratic process. It represents classic gerrymandering, a practice that we in Georgia should put behind us. Please vote NO on the new map.

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**11/9/2021C. Abbey of Coweta County**

I am strongly against the proposed merging of northern Coweta County into two separate districts. Please vote NO on the proposals which would do this. I have lived in Coweta County for 23 years. I am not pleased with the prospect of being in proposed GA House district 65 that spans three counties (Douglas across the Chattahoochee, South Fulton, and northern Coweta). A similar situation exists with proposed GA House district 67. Why are a natural boundary (the Chattahoochee River) and a political boundary (the county line) ignored in the proposed redistricting? Why is Northern Coweta County split into two districts that both have much larger areas in South Fulton? Wouldn't it be more natural for all of Northern Coweta to be bundled together, possibly with Northern Fayette that also has been bundled with Fulton County?

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**11/9/2021E. Kuniansky of DeKalb County**

Dunwoody has been and should continue to be one district. Please do not split into two districts when the map is redrawn.

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**11/9/2021S. Doran of Whitfield County**

It is a terrible thing when citizens are clearly shown how corrupt and power hungry the GA Assembly is being ran. But make no mistake, more eyes than EVER before are now on the Georgia Assembly as we assess those who serve themselves and those that serve the people of Georgia. Over the past year the truth has come to light like never before to show just how deep corruption runs in GA politics. Deep enough that a decision has been made to remove one of the FEW representatives who was doing the right thing and fighting FOR his constituents and NOT COWERING TO THE ESTABLISHMENT. We the People demand our legislature to vote against the proposed redistricting of Mr. Singleton's district and do the right thing and create the proper and fair district for Coweta county.

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**11/9/2021S. Levy of DeKalb County**

I've been a Dunwoody resident for 15 years. I've enjoyed watching Dunwoody grow. The community has always had 1 representative. It doesn't make sense to take out 2 small sections and split a city/community. It is my understanding that our population can be well represented by 1 Rep and keep Dunwoody whole. Please reconsider the changes to the map. This change removes the mayor from her Dist. and frankly does not make sense. It seems a very unnecessary change.

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**11/9/2021D. Goodman of DeKalb County**

My husband and I have been residents of Dunwoody for 22 years — before Dunwoody was a city. We are a close-a community with similar interests that should be kept together in one district. Dunwoody has about 52,000 residents and an ideal House District size for this round of redistricting is around 59,000. We have never had more than one House Representative, and there is no reason to split us up since we are well under the ideal size. The Democratic Caucus map keeps us together. Please either make changes to the committee map or approve the Democrats' map. Thank you for your consideration.

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**11/9/2021D. Shendelman of DeKalb County**

I have been a resident of Dunwoody for over 25 years. I do not understand why the proposed boundaries of the State House map call for splitting up our City. That's never been done and would be a disservice to our close knit community. We are best represented with only one House Rep. Importantly, our city is the ideal size for a House District. Please revise the current proposed committee map or approve the Democrats' map. Keep Dunwoody in one District.

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**11/9/2021T. Rubin of Cobb County**

As a resident of GA and someone who works in Coweta County, I find it unacceptable that there will be a redistricting within HD-73 for no apparent reason, except as political retribution against the current HD Rep Philip Singleton. This move will clearly jeopardize Rep Singleton's ability to maintain his seat within the state legislature which will have a negative consequence on the lives of Georgia's citizenry. I encourage Rep. Rich to defy David Ralston and do the fair and honest thing which is to squelch this redistricting effort. IO will certainly follow this issue closely and pay attention to Rep. Rich's decision on this matter.

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**11/9/2021A. Wertheim of DeKalb County**

As a 40 year resident of Dunwoody, I cannot understand why our small city will now have more than one representative. We have ALWAYS had only one representative. This will make it difficult for our Mayor to work effectively to meet the needs of our small city. Our Mayor has been disenfranchised by being cut out of what should be her district. Please either make changes to the Committees map, or support the alternative map that would keep the City of Dunwoody under one representative.

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**11/9/2021A. Oki of DeKalb County**

I have been a resident of Dunwoody resident for almost 18 years. Dunwoody is a close-knit community with similar interests that should be kept together in one district. We have never had more than one House Representative and there is no reason to split us up since our population is well under the ideal size of a House district (for reference, Dunwoody is about 52,000 people and an ideal House District size for this round of redistricting is around 59,000). Please keep our city as one district.



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**11/8/2021V. Cuz of Oconee County**

I oppose the the House Redistricting Maps as proposed. Specifically, the redrawing of the Coweta County districts to unnaturally include a finger of Fulton County can only be seen as a vindictive effort of Speaker Ralston and his mafia to unseat Philip Singleton (R, 73), a co-plaintiff in VOTERGA lawsuit calling for the removal of Dominion Voting Systems from our state's elections. Ralston has an ugly history of vendettas against opponents in his own party as evidenced by the stripping of committee chairs from those who investigated the rampant 2020 election fraud. The people will remember this, and God willing, this wrong will be righted in 2022. Rep. Rich, listen to the people.

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**11/8/2021K. H of Coweta County**

This is blatant Gerrymandering retribution against Philip Singleton and the conservative majority he represents. Fulton county elections have been problematic for a long time and I prefer that my vote actually count and not be destroyed or countered by a vote that came out of a suitcase pulled from under a table.

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**11/8/2021D. Sumner of DeKalb County**

I was very surprised to see that Dunwoody would be split into 2 house districts. We have lived here almost 20 years and it's been my understanding that we've only had one representative for Dunwoody. It is also my understanding that we are small enough to have one representative. It's also sad that our current mayor wouldn't be represented by her current legislator and the large Dunwoody district under the proposed map. Thank you.

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**11/8/2021T. Laird of DeKalb County**

When a party loses an election, as Republicans did in both Senate races this past year, it is a signal to examine the direction and tone the party has taken that lost many voters. Instead this redistricting is a desperate attempt to "game" the system and has obviously bypassed the processes for public comment and the principles of fairness. Why not instead invest your efforts in bolstering rather than undermining representative democracy?

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**11/8/2021L. Hough of Cherokee County**

The redistributing of Rep. Singleton's district is nothing more than retribution for him standing up for election integrity. If this goes through the way Ralston wants it, then it is obvious that he and anyone that signs off on it is bought and paid for by special interest and could care less about election integrity and the will of We The People. I strongly recommend you reconsider this election map. Remember, if a truck driver in New Jersey can win, then we can primary anyone with an America First candidate. STOP THE FRAUD

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**11/8/2021D. Merck of Gwinnett County**

Bonnie Rich has the power to stop this as chairperson of this committee. Ralston is clearly trying to remove Singleton from his seat because of his involvement in the voterGA lawsuit regarding Dominion voting systems. We know that QR codes are unverifiable to the voter and are illegal under GA law. Ralston is trying to block voters from being represented by Singleton. Voters will not stand for this! Please do not approve this redistricting!

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**11/8/2021P. Eckhardt of Fulton County**

I oppose the redistricting maps as proposed, as well as the hurry-up process, pushing through without adequate public input. Yes, we the people, SEE the unfairness of what those we voted for are doing. Where is integrity, honesty and the democratic principals of our Constitution.

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**11/8/2021J. Hargreaves of Fulton County**

Our nation's existence and prosperity is at stake as a result of the assault on American values that are the foundation and reason for America's prosperity and success as a world leader. Those principles, beliefs, and values are being attacked by America's enemies = foreign and domestic. In many cases, our domestic enemies, including the fascist and elite progressives and Marxists, are being financed, directly or indirectly, for America's international enemies to include China, Russia, Iran, fundamentalist Islam, and atheists and traitors like George Soros. If we don't have "fair" elections, then we might as well NOT have any Rights. America's enemies can be seen in the "soft" opposition of David Ralston, or, those who actively corrupt the system like Stacey Abrams. Both are enemies of the People's freedom and Rights. For those who do nothing, as the saying goes, the hottest place in hell is reserved for them.

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**11/8/2021S. Aleshire of Oconee County**

David Ralston, current speaker of the house, is abusing and in fact using his office as a weapon against his political enemies. His redistricting efforts are clearly a gross effort to eliminate multiple Republicans who question his authority. He seems to be acting more like controlled opposition for the Democrats than a republican colleague. It is time to consider either impeaching him or obtaining a viable candidate to run in a primary against him. Ralston is out of control. He's been in his office too long.

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**11/8/2021S. Burchardt of Fulton County**

Representative Singleton now has an 80-20% Republican majority in his District. Moving him to a district that has a 70 -30% Democrat majority is WRONG. This is an injustice to him and the people he represents. It is not in the best interest for the Republican Party or our state.

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**11/8/2021A. Knowles of Floyd County**

I strongly oppose the redistricting effort that undermines the will of the people wanting fair elections. The Dominion voting machines are compromised and can be accessed by the internet Because Phillip Singleton stood for honesty and integrity some now want to redistrict him out of his seat. Please I beg you to reconsider. We want to remain a. Free Republic with every LEGAL vote counting. Keep Phillip singleton in district 73. Thank you in advance for doing what is right and just. God is all seeing and all knowing. Be on the freedom side of histroy If freedom is lost in America we will have no where else to go God Bless each of you. Ask for His guidance and wisdom Thanks inadvance Angela Knowles

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**11/8/2021W. Arthur of Screven County**

I strongly oppose the redistricting effort, which is clearly designed to Jerrymander Rep Singleton out of his seat. The reason is simply that he is attempting to get our elected government to follow it's own laws with respect to the illegal Dominion voting machines that thwart the will of the people and steal our votes. If the votes are going one way or the other in reality, they'll still be that way when we go back to counting them manually. Otherwise, it's rigged. It's simple as that. Please ensure fair lines are drawn. And how about taking my call next time instead of leaving a message to "go to the website." I am out here working for a living and took time out of a busy day because this was important to me and you could at least answer the phone.

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**11/8/2021O. Alligood of Gwinnett County**

I oppose the unfair redistricting attempt to undermine and limit Conservative representation. I don't understand with Republican control in the House and Senate why you are purposely proposing redistricting that favors the Democrats? We the people voted for Republicans knowing that redistricting would be determined this year. If this is

Speaker Ralston's attempt at retribution for anyone standing up to him, then he is not looking out for the best interest of Georgia Republicans and neither is anyone that votes with him on this issue.

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**11/8/2021N. Tieman of DeKalb County**

Redistricting MUST BE BIPARTISAN. To do otherwise would be a slap in the face of Democracy. Please do the right and moral thing and make redistricting BIPARTISAN. Thank you

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**11/8/2021M. Hodges of Gwinnett County**

Yes, Bonnie Rich can put a stop to We the People being ignored on redistricting This redistricting map has received failing grades from non-partisan groups. We the People are awake and watching.

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**11/8/2021V. Sutton of Floyd County**

I would say our Republican officials removing one of our own by redistricting is shocking, but it's not. I believe the elected officials believe we are just going to quietly go back to normal if they don't get rid of dominion election software. Instead of listening to we the people, they are going to get rid of the one elected official who is listening to the majority of we the people in Georgia and fighting for us to dump Dominion. It's time we voted out these career politicians who are choosing to ignore us. We ask them to rethink this redistricting circus campaign and do NOT get rid of Mr Singleton. Of course, I'm prepared to be ignored by them. They are above their constituents after all. Otherwise, dominion would have been gone by now instead of them looking to remove a Republican who's fighting against the software company.

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**11/8/2021C. Cape of Cherokee County**

We need four house seats, and one senator seat in Cherokee County.

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**11/8/2021J. Hodges of Cobb County**

It's time for our Republican representatives to actually uphold the will of the people who placed them in office rather than playing political games. This obnoxious attempt to finger district lines into Coweta county to displace Rep Singleton is a disgraceful attempt at retribution by Ralston. We see you. Conservatives are more tuned into our elected officials than ever before and we PROMISE to campaign against and unseat anyone who subverts our vote through gerrymandering and political malice. Election integrity is a winning issue and of utmost importance and targeting those who listen and actually work on behalf of their constituents will not be overlooked.

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**11/8/2021S. Lastinger of Coffee County**

The speaker's attempt to remove Dominic LaRiccia from office by redistricting him out of most of Coffee County is a low blow. He has put him competing against the representative in Ware county in which there would be a good conservative representative getting beat in the primary. All because he doesn't want Rep. LaRiccia running for the caucus chair. This is the "swamp" that we need to get rid of. Help me find a guy to primary against the speaker. I am going to do everything in my power to expose him. This is just one example.

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**11/8/2021K. Williams of Chatham County**

What the Heck!?! I thought David Ralston was supposed to help increase the number of republican seats in the house and not steal them away to be vindictive. It shows everyone that he doesn't care about Georgia republicans!! Georgians make sure to remind everyone that BONNIE RICH has the power to stop this!!



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**11/8/2021J. Hodges of Cobb County**

The redistricting of this Fulton district is clearly an attempt to undermine the representation of Coweta county - Do not let this happen!

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**11/8/2021G. Houghton of Cherokee County**

Voter GA is a non-partisan organization representing all Georgians in election integrity. It is infuriating that redistricting would be used to penalize a legislator for supporting the very election laws the legislature itself passed!! I am sick and tired of this sort of childish behavior from our elected officials and implore you to overrule Speaker Ralston and act with integrity on behalf of your constituents.

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**11/8/2021M. Knope of DeKalb County**

I am very upset that this proposed map splits Dunwoody, a community where I have lived for years. Dunwoody is a close knit, cohesive community. It's like a small town. We have been in the same House District for more than a decade. Our population is still small enough to be kept together. Please keep us together as a community of interest.

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**11/8/2021L. Petcu of Barrow County**

Speaker David Ralston's attempt to redistrict Rep. Singleton out of his seat as retribution for standing up for his constituents' concerns about voter integrity, it's unacceptable. Georgia GOP has to rally not behind Speaker Ralston. Every single Republican up for reelection will come and ask for our vote soon enough. Rest assured, we will remember the cowards, and we had enough of your excuses. DO THE RIGHT THING.

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**11/8/2021K. M of Gwinnett County**

This is a political witch hunt and nothing more. It has nothing to do with better serving the people you're supposed to represent and everything to do with punishing people who have the will of the people behind them. We see you - and we're done with this nonsense. Vote yes at your own political peril.

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**11/8/2021D. Whaley of Cherokee County**

As an ex-NYer I can spot tampering with the will of the People and this is certainly it! This is not an acceptable plan for redistricting. Nor the best way for the ppl to be heard - at all. A fairer plan is in order stat! So is a full state election audit while we are at it! Stop trying to redistricting out constitutional public servants for honoring the will of the ppl!

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**11/8/2021L. Skaggs of Coweta County**

This is Gerrymandering by definition! PLEASE VOTE NO! This map is atrocious and leaves a good portion of the voters of my county without any voice or representation. Northern Coweta County, South Fulton and Douglas Counties have nothing in common regarding the issues that matter to us and our respective communities. Stealing votes, again, reflects poorly on the body who created it. DO NOT PASS THIS MAP AS IT CURRENTLY IS DRAWN! LEAVE COWETA COUNTY ALONE! VOTE NO!!

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**11/8/2021K. Carlisle of Lowndes County**

We oppose the unfair redistricting attempt to undermine and limit Conservative representation. More time and thought towards fairness should be included in this process.

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11/8/2021**J. Clodfelter of Gwinnett County**

You all seem to be underhanded legislators. You are redistricting Singleton because he is listening to we the people. A federal judge ruled that the machines are illegal because they are not human readable. Were you a legislator that was selected by machines or were you elected? Your vote on redistricting will answer my question. Sincerely Janelle Clodfelter

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11/8/2021**D. Ratonyi of DeKalb County**

I am concerned about splitting Dunwoody into separate districts. We are a small city that ought to be able to have unified representation. Thank you!

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11/8/2021**B. Berman of Fulton County**

I heartily oppose the redistricting maps as drawn. They are obviously an attempt to cheat urban, low income and people of color out of their democratic rights.

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11/8/2021**C. Howard of Fulton County**

This map has been released late, planned with partisan interests in mind, and has been given a failing grade for fairness. I want Georgia to have an independent commission to work on the redistricting map so that all Georgians can have an equal voice.

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11/8/2021**M. Hill of DeKalb County**

I oppose the redistricting maps as proposed, as well as the hurry-up process by which you are pushing them through without adequate public input. The Senate district map received an "F" grade from Fair Districts Georgia and the Princeton Gerrymandering Project - it's clear why. Georgia can do better than this. Divide it up fairly and let the people speak. The state legislature as it stands now and looks to be in the future is not representative of what Georgians think or want. Do what's right for our state and not your party.

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11/8/2021**A. Tennenbaum of Fulton County**

The redistricting process has not been transparent or accessible. Transparency and the opportunity to participate have been some of the primary demands from the public regarding this process -- I had trouble figuring out what was going on, especially with less than 1 week between when the maps were released and when they might be voted on. It was difficult to find the most updated proposed maps, compare them to current maps, and know how best to make my voice heard and by when. I am also concerned that the proposed maps do not have community representation in mind: Georgia is a 50-50 split between Republicans and Democrats, but the proposed maps do not reflect that partisan balance, and therefore are not a reflection of our state. I want to know that when I vote, I am able to choose who represents me and the desires of my community.

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11/8/2021**A. Zook of Cherokee County**

Cherokee County NEEDS four (4) house district seats and one (1) senator seat in the county. This is imperative to Cherokee County residents!

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11/8/2021**A. Zook of Cherokee County**

Though I live in Cherokee County, changing to more fair redistricting in Fulton Co. is very important to all Georgians. Please DO NOT extend Fulton Co. further south into Chatom County!

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**11/8/2021R. Routsong of Coweta County**

I am writing to say that I am strongly opposed to any Redistricting of Northern Coweta County. Coweta County representation does not need to be in Fulton County. We need to be represented by someone who lives in Coweta County and not As an afterthought to Fulton County. Please vote NO. Thank you

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**11/8/2021B. Hines of Cherokee County**

This is an obvious power grab & is not in the best interest of fair elections.

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**11/8/2021B. Walker of Cherokee County**

Cherokee needs four (4) house district seats and one (1) senator seat in the county.

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**11/8/2021S. Butler of Fulton County**

Draw the Redistricting Lines More Fairly The new restricting moves the Republican from District 73 that has an 80-20% Republican majority to District 67 that has a 70-30% Democrat majority. This is a clear attempt by House Speaker David Ralston to redistrict a republican out of his seat! Kindly stop this injustice! This mere retribution by Ralston DOES NOT benefit the republican party! Thank you, A VERY CONCERNED REPUBLICAN CITIZEN

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**11/8/2021N. Burchell of DeKalb County**

The Republican redistricting and gerrymandering of the electoral maps is blatantly political in favor of the GOP and continues to undermine the democratic principles this country was built upon.

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**11/8/2021S. Wymer of Cherokee County**

The Senate district map received an "F" grade from Fair Districts Georgia and the Princeton Gerrymandering Project. As one of the strongest republican counties in the state it is imperative that we have at least four (4) house district seats and one (1) senator seat in the county. The current proposal is unjust, unfair and a clear overreach to unseat certain representatives. I object to this redistricting and support a motion to return this proposal to it's committee to be re-evaluated.

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**11/8/2021A. Ferrard of Fulton County**

Looks like your maps were given an F for good reason. As demographics change, the maps should change. They should change to reflect the population, not to protect any party. Listen to your constituents and change the maps. You may have been given the data late from the US Census, but that does not justify trampling the process and ignoring the concerns of Georgians. Fair maps. This year.

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**11/8/2021R. Patton of Bryan County**

If you want your redistricting results to have credibility and the trust of the voters, you must give more time to ordinary citizens to review these maps. To rush the vote to committee and to the full legislature adds mistrust and suspicion to your actions. Give people time to understand the implications of these maps.... If you care about or want their support.

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**11/8/2021C. Johnson of Columbia County**

I am a member of the Columbia County Republican group & VoterGA. Understand that Republicans are wide awake to the fact that we have other "R's" in office who do not have our State's and Country's best interests at heart, and we are watching our elected officials CLOSELY during this special session to identify any party members that we want removed from office. If this special session is wasted on anything other than working to eliminate corruption in our election process (forensic audit), & to protect Georgia citizens from illegal Nuremberg Code defying MANDATES (while Congress/CDC have NO MANDATES...don't think we didn't notice) then you are PAINFULLY out of touch w/ the people who elected you, that are losing their jobs, kids can't go to college, & now they are coming after our children w/ this untested gene therapy. If we find that Rep. Singleton's district has been touched for actually HEARING the concerns of his constituents, we will know where Ralston & Rich stand.

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**11/8/2021G. Hofgex of Gwinnett County**

VOTE NO on redistricting. David Ralston's redistricting charade is completely and transparently vindictive. The people of Georgia have had enough.

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**11/8/2021E. Fusillo of DeKalb County**

All eyes are on Georgia now and in the future. The purposeful denigration of the redistricting process by the Republican legislature in Georgia do not make for a good look. To our GOP representatives, know that voters will work hard to overcome the handicap you plan for them. Georgia lawmakers must represent what Georgia really is-- and that is not white and male anymore.

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**11/8/2021J. Smith of DeKalb County**

The Senate district map received an "F" grade from Fair Districts Georgia and the Princeton Gerrymandering Project - we can do better than this. Divide it up fairly and let the people speak. The GA legislature as it stands now and looks to be in the future is not representative of what Georgians think or want. Do what's right for our state and not your party.

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**11/8/2021F. Boswell of Coweta County**

What is Gerrymandering in simple terms? Gerrymandering is when a political group tries to change a voting district to create a result that helps them or hurts the group who is against them. Gerrymandering works by wasting votes. It puts more votes of winners into the district they will win so the losers win in another district. Now listen to your constituents and vote NO. These comments makes it clear that the redistricting isn't supported nor wanted. Considering that Coweta is a conservative county, incorporating any part of Coweta into the Fulton voting lines would simply be silencing a large number of the voters. This is especially disturbing considering that parts of south Fulton wish to become part of Coweta. Fulton County and Coweta County have different lifestyles therefore different values. Neither county should speak for the other. This is simply unacceptable so do your job and VOTE NO!

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**11/8/2021K. Grindlay of Gwinnett County**

Are we supposed to believe it's a coincidence that Rep. Singleton is being redistricting out of office after he pointed out that there has not been a real audit of the 2020 election and after he fought to remove Dominion machines? What a joke. If you go forward with this, We the People will be holding every single person involved accountable at the polls during primaries. We will not forget this. Choose wisely.

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**11/8/2021P. REEL of Cherokee County**

Please do NOT use the present map for redistricting! Do not divide Cherokee Co. to weaken our vote! We want 1 senator and 4 representatives that live in Cherokee County. Secondly, I object with the current proposed map that will take Rep Phil Singleton out of his district in Coweta County where the people voted for him by 75%. Please put the lines back to make Coweta County whole. Finally, I object to the way the current proposed map favors Democrats in District 43 in East Cobb and District 35 in Kennesaw to the Democrats.

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**11/8/2021D. Roesler of Coweta County**

I am writing to say that I am strongly opposed to any Redistricting of Northern Coweta County. Coweta County representation does not need to be in Fulton County. We need to be represented by someone who lives in County and not As an afterthought to Fulton County. Please vote NO. Thank you

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**11/8/2021J. LaFond of Coweta County**

Your job is to listen to your constituents, and vote accordingly. Reading the comments, alone, makes it clear that the redistricting isn't supported. Coweta is a conservative county. Making any part of us changed to Fulton would be simply removing our voice. Fulton absolutely does NOT reflect the values, and desires, of Coweta. This is simply unacceptable. Do your job and VOTE NO!

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**11/8/2021S. Berson of Gwinnett County**

The republicans will keep doing whatever they want until we stop them. So VOTE. We must gain majority and somehow change this redistricting that keeps them in power.

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**11/8/2021C. Smith of Coweta County**

Vote no on redistricting northern coweta county. There is no reason to cross the county line to group us with South Fulton. Our needs and lifestyles are not reflected in any way with with any of that of Fulton country

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**11/8/2021S. Soriya of DeKalb County**

You must put forth proposals to the community before going to a vote. This is a bifurcated state now, it is not a RED state as was shown in the last national elections. Therefore you must get buy-in from your constituents!

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**11/8/2021K. Stanhope of DeKalb County**

These maps show why we need non-partisan districting committees. It's so frustrating to see how these are complete unresponsive to the voices of voters. Please vote no on these maps and work towards transforming how redistricting works in Georgia.

---

**11/8/2021M. New of Cherokee County**

The present map for redistricting is unacceptable! Do not divide Cherokee Co. to weaken our vote! We want 1 senator and 4 representatives that live in Cherokee County. Stop using the reapportionment to punish those you do not like. An example is Philip Singleton whom Ralston wants to get rid of because he does not agree with him about the Dominion voting machines.

---

11/8/2021 **J. Olkin of DeKalb County**

These partisan games are unraveling the core fabric of our democracy and society. Do it again and meet the independent standards for fairness.

AVAILABLE



Testimony submitted by Mary Lou McCloskey  
11/17/21

Date: November 17, 2021  
From: Mary Lou McCloskey,  
1958 Starfire Drive NE, Atlanta GA 30345  
To: Georgia House and Senate Redistricting Committees  
Re: Redistricting for US Congress

Respected Committee Members:

I've been a resident of Briarcliff Woods East in unincorporated DeKalb County since 1984. I have been a voter in the 6<sup>th</sup> US district for many years now, though my districts have changed during each redistricting cycle since I have lived here.

I'm speaking today to express my concern with the Georgia legislature's draft congressional map. I find serious flaws in both the contents of the map and the process of its creation.

The proposed map removes my community from the 6<sup>th</sup> congressional district and into the 4<sup>th</sup>. I am concerned by this map, which appears to give less representation to minority voters by packing them into the 4<sup>th</sup> while cracking them in the 6<sup>th</sup> by adding a large number of mostly white voters from Forsyth County. My community doesn't like this redrawn map. We want to remain in a district with a representative we know and respect. We also don't like the fact that the criteria for these changes are unknown.

Because the redistricting committees have not been transparent, we are left to assume that the purpose of this district change is to create one more red district in a state that is clearly growing more purple, and/or to pit two outstanding female representatives against one another, one of them a woman of color. We very much need fair representation of both women and persons of color in our congress. It is unnecessary to redraw the 6<sup>th</sup> and 7<sup>th</sup> districts the way you have done neither in order to take into account census changes in Georgia, nor to assure minority opportunity for representation.

My community believes that redistricting should be fair, transparent, and should respect voters wishes. We had no way to anticipate these changes and provide our input during the public hearings, which were held before the census was complete and before any draft maps were drawn. We fear you will not have time to listen or act on our recommendations between this meeting and your vote. We do not think it is fair that one party's political priorities should determine our districts. We ask that you please listen to us, slow down, and revise this map to make it fair.

Thank you.

AVAILABLE

submitted by Cindy Datto  
11/17/21

POLITICO



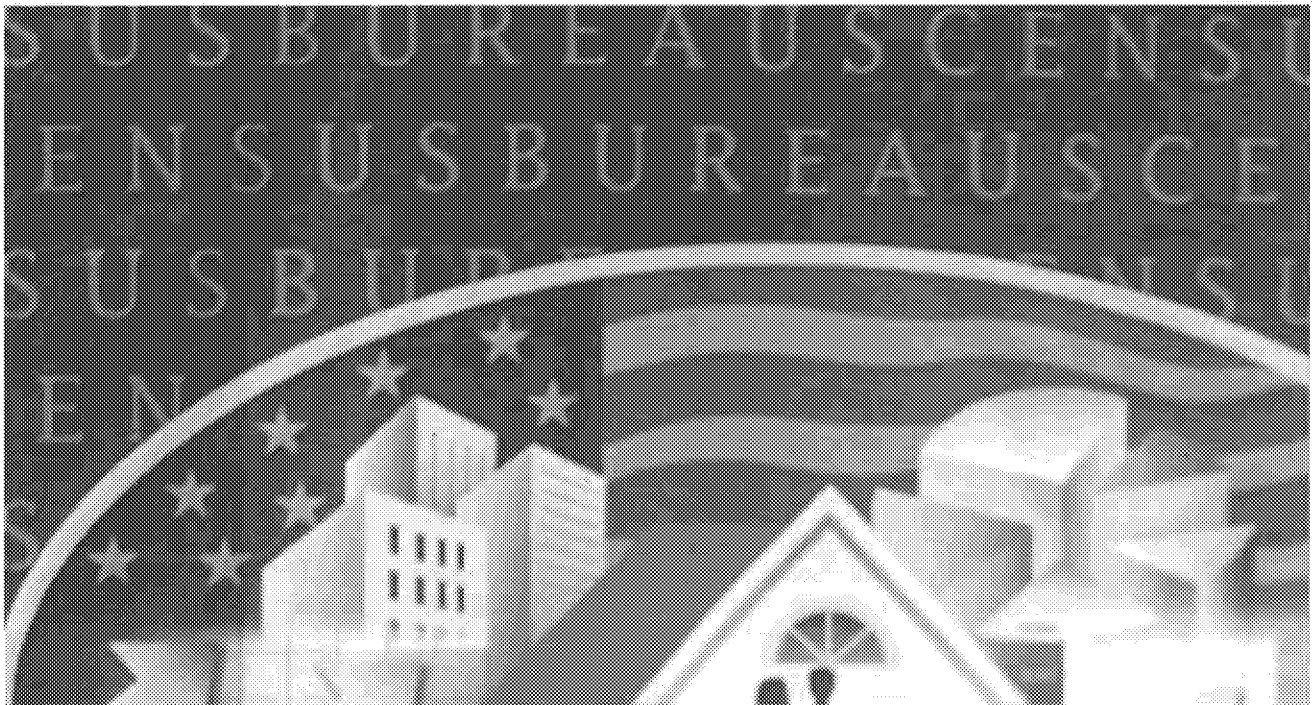
POLITICO



## Leading Trump Census pick causes alarm

The 2020 count might be put in the hands of an inexperienced professor who wrote that 'Competitive Elections are Bad for America.'

By DANNY VINIK and **ANDREW RESTUCCIA** | 11/21/2017 05:06 AM EST



The fate of the census under President Donald Trump has been closely watched by voting-rights advocates worried that the administration might nudge it in directions that over- or undercount some Americans. | Carlos Osorio/AP

The Trump administration is leaning toward naming Thomas Brunell, a Texas professor with no government experience, to the top operational job at the U.S. Census Bureau, according to two people who have been briefed on the bureau's plans.

Brunell, a political science professor, has testified more than half a dozen times on behalf of Republican efforts to redraw congressional districts, and is the author of a 2008 book titled “Redistricting and Representation: Why Competitive Elections Are Bad for America.”

The choice would mark the administration’s first major effort to shape the 2020 census, the nationwide count that determines which states lose and gain electoral votes and seats in the House of Representatives.

The fate of the census under President Donald Trump has been closely watched by voting-rights advocates worried that the administration — which has already made unsupported claims about voter fraud — might nudge it in directions that over- or undercount some Americans. Subtle bureaucratic choices in the wording and administration of the census can have huge consequences for who is counted, and how it shifts American voting districts.

The pick would break with the long-standing precedent of choosing a nonpolitical government official as deputy director of the U.S. Census Bureau. The job has typically been held by a career civil servant with a background in statistics. It does not require Senate confirmation, so Congress would have no power to block the hire.

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“If true, it signals an effort by the administration to politicize the census,” said Terri Ann Lowenthal, former co-director of the Census Project, an organization that tracks the census. “It’s very troubling.”

Brunell was under consideration over the summer for the Senate-confirmable job of census director, but the administration declined to nominate him after receiving pushback from Capitol Hill, according to two people who track the census closely.

The White House and Census Bureau both referred comments to the Commerce Department, which oversees the bureau. The Commerce Department declined to comment. Brunell, reached by phone, declined to comment.

The hiring could be announced as soon as this week, though Trump administration personnel decisions often change at the last minute. One administration official said the situation remains "fluid."

As deputy director of the Census Bureau, Brunell would become the highest-ranking permanent official at the agency. Though the deputy director technically reports to the census director, that slot is temporarily being filled by a career civil servant, since former director John Thompson resigned at the end of June. There is currently no nominee for a permanent director.

"This is worse than making him director," said a former high-ranking Commerce Department official. "There still is going to be hell to pay on the optics. The Democrats and civil rights community will go nuts."

Though it may seem like a dry bureaucratic task, the \$16 billion decennial census has become the focus of hotly contested political arguments in a moment when the question of who counts as an American has risen to the top of the national debate.

The census attempts to count every person who lives within the U.S. borders, and Republicans have long sought to add a question asking respondents about their immigration status, including whether they are U.S. citizens. Democrats and many civil rights groups worry that adding a citizenship question would cause a huge drop in minority response rates, with recipients concerned about what the government would do with the information.

In January, a leaked draft of an executive order directed the Census Bureau to add such a question to the “long form” census, known as the American Community Survey, which is a longer, more detailed look at a subset of people living in the U.S. According to the two people who track the census closely, the administration is currently mulling a similar executive order.



## **Watchdog says Homeland Security bottling up travel ban report**

By JOSH GERSTEIN, TED HESSON and SEUNG MIN KIM

So far, fears that the administration will complicate the census with a citizenship question have not panned out. Trump has not yet issued the order, and two senior administration officials said the issue is not yet being discussed at a high level in the West Wing. Wilbur Ross, the commerce secretary — who once worked as a census enumerator himself — has previously argued that adding questions to the decennial would reduce response rates.

But rumors about the hiring of Brunell have reignited those concerns. The deputy director is effectively the chief operating officer and chief financial officer at the Census Bureau, making Brunell a critical person as the agency gears up for the 2020 census. The position has been filled by a temporary career civil servant since former deputy director Nancy Potok left in early January to accept an Obama administration appointment as the country’s chief statistician.

Even a seasoned census hand would be stepping into a difficult job as deputy director now. For the past year, advocates and statistical experts have been warning that the missing top management at the agency and its underfunding by Congress could lead to an inaccurate count in 2020. The bureau is currently conducting its test run for the 2020 census, but it had to cancel components of the test due to limited funding. The agency has also delayed its regular economic census by six months due to funding shortages.

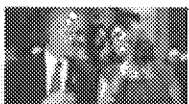
Census-watchers were also upset at the Trump administration’s 2018 budget request for the Census Bureau, which was just 7 percent above its 2017 level. The bureau typically requires — and receives — a huge bump in funding as the decennial approaches, since it must hire tens of thousands of people and open dozens of field offices nationwide. In a rare move, the Trump administration publicly admitted that the bureau’s 2018 budget was too low when Ross asked Congress in October for an additional \$187 million, above the administration’s \$1.5 billion request.



Brunell's background makes him an unusual choice for the deputy director role. Based on his published curriculum vitae, he appears to have little experience in federal statistics or at managing a big organization, both characteristics that census-watchers believe are vital for the job. In comparison, Potok, his predecessor, spent most of her career at the Census Bureau.

"It's quite a difference going from an academic setting to the Census Bureau," said a person who has worked with Brunell, who asked for anonymity to speak freely about him. "I don't think he's done the administrative work that would be needed to be at a high level in a large organization like the Census Bureau."

Brunell received a Ph.D. in political science from the University of California Irvine in 1997 and worked briefly on Capitol Hill as a fellow on a House subcommittee that oversees the census. Since 2005, he has worked at the University of Texas at Dallas, where his research and writing has focused on redistricting and voting rights cases. He has frequently advised states on redrawing their congressional maps. In his 2008 book, "Redistricting and Representation," he argued that partisan districts packed with like-minded voters actually lead to better representation than ones more evenly split between Democrats and Republicans, because fewer voters in partisan districts cast a vote for a losing candidate. He has also argued that ideologically packed districts should be called "fair districts" and admits that his stance on competitive elections makes him something of an outlier among political scientists, who largely support competitive elections.



#### ENERGY & ENVIRONMENT

### 'UGHI': Zinke's wife's travel caused headaches for Interior staff

By BEN LEFEBVRE

Brunell, a registered Republican, has criticized partisan gerrymandering in his work. But the GOP has repeatedly used his research in redistricting efforts, and he appeared as an expert witness to defend GOP-led states in lawsuits over potential gerrymandering. After the 2010 census, he testified or wrote a report in support of GOP redistricting efforts in Alabama, South Dakota, South Carolina and New Mexico.

In North Carolina, where GOP leaders drew congressional districts that were ultimately overturned by the Supreme Court for unfairly discriminating against black North Carolinians, he wrote a report on behalf of the state analyzing the extent of racially polarized voting in 51 North Carolina districts. In Ohio, he wrote a report in opposition to expanded early voting, which many political scientists believe favors Democrats, arguing that it reduces overall turnout because it "takes away from Election Day as a civic event."

Brunell's research has also tackled the census itself. In the early 2000s, he wrote multiple papers on the political controversy surrounding the 2000 census, which included new statistical adjustments intended to more accurately count minorities and other groups that are relatively less likely to respond to the census. Republicans argued that the new techniques were a veiled effort to boost the Democrats' political fortunes; Brunell was sharply critical of them as well, arguing that "a census with an adjustment ultimately leads to a less accurate headcount simply because the post-census adjustment becomes a crutch."

If Brunell is installed in a top Census Bureau job, "there are tons of little things he could be doing to influence what the final count looks like," said the former high-ranking Commerce official. "The ripple effect on reapportionment would be astounding."

Many of those decisions would be less visible, or even invisible, to the public. Brunell, for instance, would oversee the agency's advertising budget, which is essential to persuading groups like undocumented immigrants to respond to the decennial. The agency is set to spend more than \$400 million over the next few years on those advertisements, and decisions about how and where to spend those dollars will be key to getting an accurate count.

Brunell's background also indicates that the White House is heavily focused on the political outcomes of a survey that is primarily supposed to gather objective data about the country. Since 1790, the decennial and the long-form census, along with other products produced by the agency, have been a primary source of rich and objective data for use by researchers. Beyond its impact on elections, the decennial census directs the destination of hundreds of billions of dollars of federal funds each year. Brunell's résumé, however, does not indicate that he has any expertise or experience with those elements of the agency's mission.

The selection of an outsider represents something of an unprecedented break with past leadership of the bureau. Thompson, the previous director, was nominated by President Barack Obama but had previously spent 27 years working as a career civil servant at the agency. Thompson's predecessor, Robert Groves, was also an Obama appointee. He had worked as a civil servant at the bureau in the 1990s.

"It is imperative that the Census Bureau's leadership be viewed by the public and by lawmakers as completely nonpartisan," said Lowenthal. "If either the director or the deputy director bring partisan baggage to their position, public confidence in the integrity of the census could plummet. So could congressional confidence. And it is Congress that must accept the apportionment results. All this stuff worries me."

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**HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT  
COMMITTEE RULES  
2021-2022**

1. The quorum for the committee shall be **six (6)** members.
2. The committee shall convene, recess, and adjourn upon the order of the Chair.
3. A bill, resolution, or other matter will be considered only after being presented by its principal sponsor or a legislator designated by the principal sponsor. When a bill or resolution is placed on the committee agenda, the principal sponsor shall be notified of the time and place of the meeting. No bill shall be placed on the calendar of the House Legislative and Congressional Reapportionment Committee **unless a request is made to the Chair** in writing.
4. The Chair shall establish the meeting agenda and determine the measures to be considered and the order of consideration.
5. Action may be taken on a bill or resolution at its first presentation to the committee, at the discretion of the Chair.
6. The Chair may appoint subcommittees and officers of subcommittees and, at the discretion of the Chair, refer any matter to a subcommittee; but **no** measure will be reported to the House except after consideration by the full committee.
7. During committee meetings, committee members and all members of the public shall turn off or place in silent mode all cell phones, pagers, and other similar devices.
8. The Chair may present to the committee a proposed change in these rules at any time.
9. The Rules of the House shall control any case not provided for in these rules.
10. Officers of the committee shall be ex-officio **voting members** of all subcommittees.
11. All hearings will be at the direction of the Chair.
12. Committee discussion may be limited by the Chair.

PUBLIC

## **2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.



- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### III. REDISTRICTING PLANS

#### A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

#### B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
  - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

NOT  
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HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE

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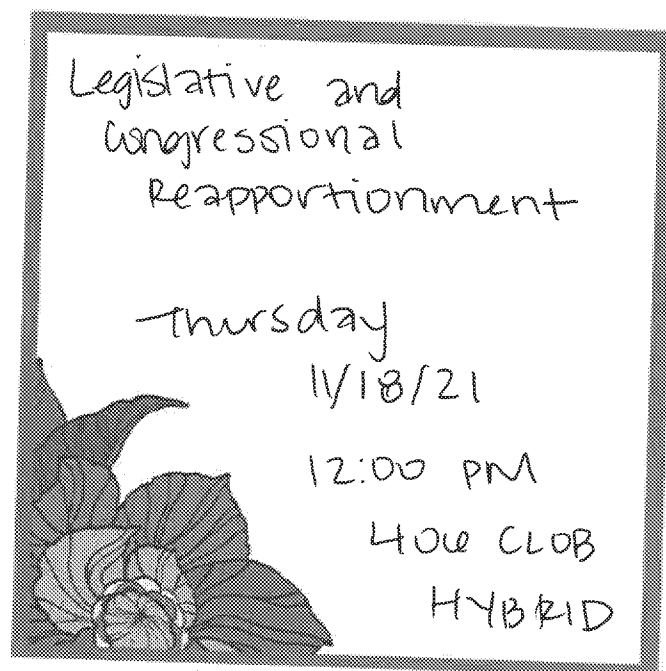
SPEAKER SIGN-IN SHEET

FIRST AND LAST NAME	ORGANIZATION (IF ANY)	EMAIL ADDRESS	RESIDENTIAL ADDRESS	PHONE NUMBER	COUNTY OF RESIDENCE
✓ Maggie Goldman	Resident of Johns Creek		Johns Creek		Fulton
✓ Mary Lou McCloskey	Fair Districts GA		DeKalb		
✓ Ken Lawler	FAIR DISTRICTS GA				
✓ Cindy Battles	Peoples Agenda		SW Atlanta		Fulton
✓ Stephanie Ali	New GA Project				
✓ Vasu Abhiraman	ACLU of Georgia	A			
✓ Kareem El-Hosseiny	CAIR - Georgia		unincorporated DeKalb		DeKalb
✓ Katherine Maddox	Protect the Vote GA		FULTON		
✓ Marijke Kylstra	Fair Court		Fulton		Fulton
✓ STACEY HOPKINS	CITIZEN		FULTON		FULTON

1



# EXHIBIT 3



PUBLIC



**BONNIE RICH**  
Representative, District 97  
PO Box 663  
Suwanee, Georgia 30024  
Bonnie.Rich@house.ga.gov

**House of Representatives**  
COVERDELL LEGISLATIVE OFFICE BLDG  
18 CAPITOL SQUARE, SUITE 402  
ATLANTA, GEORGIA 30334  
(404) 656-5087 (Office)

**STANDING COMMITTEES**  
**Legislative & Congressional**  
**Reapportionment; Chairman**  
Education, Judiciary,  
Retirement, Ways & Means,  
Special Committee on Access to  
Civil Justice System  
Special Committee on Election Integrity

November 17, 2021

TO: House Legislative and Congressional Reapportionment Committee

FROM: Representative Bonnie Rich, Chairman

The House Legislative and Congressional Reapportionment Committee will have a meeting on Thursday, November 18, 2021, 12:00 p.m. to 5:00 p.m. in CLOB 406.

**AGENDA:**

- Consideration and public comment of HB 2EX
- Consideration and public comment of HB 5EX

*\*Agenda subject to change at the discretion of the Chair.*

Zoom details for participants will follow via email.

This meeting will be available to the public via livestream on the [House Broadcast webpage](#).

cc: Speaker's Office  
Clerk's Office  
Legislative Counsel  
Policy Analyst  
Fiscal Office  
Media Services

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406, 506, or 606 CLOB

	PRINCE										
1	2	3	4	5	6	7	8	9	10	11	12

SETZLER		FLEMING	EFSTRATION					RICH	TAYLOR	R. SMITH	NIX			JACKSON	GILLIARD	SCOTT	ALEXANDER
13	14	15	16	17	18	19	20	CHAIR	21	22	23	24	25	26	27	28	29



EACH MEMBER HAS  
IN FRONT OF THEM

---

- PUBLIC COMMENT
- AS OF 11/18 @ 10:45 AM
- GHDC/GSDC MAP PACKET
- MAJORITY MAP PACKET
- COMMITTEE GUIDELINES
- COMMITTEE RULES

MEMBERS ON  
ZOOM:

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· JAN JONES

IDEAL  
CONGRESSIONAL  
DISTRICT SIZE:

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765,136

### Microphone List:

13-setzer

29-Alexander

~~13. Setzler~~

~~15~~ Fleming

13-setzer

28-Scott

VAH - SUU

AHH-BEE-RAH-MEN

AVAILABLE

Legislative and Congressional Reapportionment Committee Attendance  
2021

Date: 11/18/21 Room: 406 CLOB Time: 12:00 PM

- ☒ Bonnie Rich - Chair
- ☒ Darlene Taylor - Vice Chair
- ☐ Susan Holmes - Secretary
- ☒ Kimberly Alexander
- ☐ Mandi Ballinger
- ☐ Buddy DeLoach
- ☐ Matt Dollar
- ☒ Chuck Efstration
- ☒ Barry Fleming
- ☒ Carl Gilliard
- ☒ Mack Jackson
- ☒ Jan Jones
- ☒ Randy Nix
- ☒ Brian Prince
- ☒ Sandra Scott
- ☒ Ed Setzler
- ☐ Lynn Smith
- ☒ Richard Smith

TOTAL PRESENT 13

PUBLIC

# JOINT REAPPORTIONMENT PUBLIC COMMENTS

BETWEEN NOVEMBER 17, 2021 @ 1:15 PM AND NOVEMBER 18, 2021 @ 10:45 AM

11/18/2021**M. Simpkins of Fulton County**

I live in the diverse community of John's Creek in North Fulton 6th district. Our community has little in common with Forsyth County which has minimal diversity and a sordid racial history. Attaching urban North Fulton to rural Forsyth pretty much assures that my vote will no longer count. But then isn't that the objective of redrawing the map? Leave my vote alone!

11/18/2021**J. Berkowitz of DeKalb County**

I'm not surprised at the power grab demonstrated in the redistributing maps. I'm saddened that the tactic is to disenfranchise people of color, and to rig a system so that minor views can keep power. Go back to the drawing board and draw fair maps.

11/18/2021**S. Riddle of Cobb County**

While you are bragging about keeping most counties intact - an admirable goal when drawing new Districts - what is the justification for dividing Cobb County into FOUR Congressional Districts? It has been difficult enough when we have had THREE Districts. Plus you are moving a community that is predominately African American into an overwhelmingly White District - totally dismissing their voices - particularly given who the current congressional representative is, and I say that as a White Woman. As bad as the September map was, it was superior to this map.

11/18/2021**T. S of Cobb County**

Districts should be drawn fairly to be competitive and must reflect the diversity that GA is lucky to have. These proposed maps are nothing but a power grab and not drawn in good faith. Please adhere to the Princeton Gerrymandering project guidelines and stop disenfranchising voters. We deserve better.

11/18/2021**M. Salpeter of Fulton County**

As a resident of the 6th District, I am extremely disappointed and upset to see the Republican's proposed map that now includes Dawson and Forsyth Counties and eliminates North Dekalb County as well as parts of North Fulton County from the 6th District. The proposed map creates a gerrymandered district that includes constituents without common interests. Citizens of Sandy Springs have no clear commonalities with citizens of Dawson and Forsyth. On the other hand, Sandy Springs and all of North Fulton share common interests with neighbors in Dekalb and Cobb. The proposed Republican map disenfranchises citizens living in the 6th District. The Census data does not require the major changes Republicans have proposed for CD 6. I support the Democrats' map that keeps North Dekalb in CD 6 and keeps all of North Fulton in the 6th District.

11/18/2021**J. Figueroa of Cobb County**

Please don't redistrict west Cobb county. In no way, shape, or form does the population of this area match the rest of that proposed district. We would not be equally represented and that infringes on our democratic rights.

11/18/2021**E. Shackelford of DeKalb County**

Why not have fair maps? This is a power grab. The proposed map gives Republicans a likely 9R/5D split with zero competitive seats. Our current make-up is 8R/6D. Why do you want to defeat the democratic process? We are watching, and we vote.



---

11/18/2021**G. Houghton of Cherokee County**

Do not split Cherokee County into 2 districts! Keep us as one!

---

11/18/2021**B. Mapp of Oglethorpe County**

Gerrymandering is wrong. The voters should have an opportunity to vote on this matter.

---

11/18/2021**R. Spadoni of DeKalb County**

I'd like to believe that regardless of political affiliation we all want equal and fair representation. Wheres the integrity with this proposal?

---

11/18/2021**L. Sutphin of Fulton County**

Georgia deserves proportional representation, not gerrymandering to favor one party over another.

---

11/18/2021**M. Bosserman of DeKalb County**

This map does not reflect the current population of Georgia. It is designed to minimize the political will of black Georgians and citizens in metropolitan areas. While our Republican Legislature has had plenty of scope to improve the lot of rural Georgians they have not chosen to do so since they don't have to. This is an example of extreme gerrymandering. In concert with the truly wretched new voter suppression bill we can expect elections that bring us Jim Crow 21st Century.

---

11/18/2021**A. Bralley of Fulton County**

Blatant gerrymandering. Such a sad State for fair representation

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11/18/2021**J. Vargas of Fulton County**

The proposed map for the new 6th district is ridiculous. North Fulton needs are NOT the same as Forsyth and Dawson. A single representative cannot possible represent completely different constituents. This is gerrymandering at its finest guaranteeing republican seats. This should be illegal

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11/18/2021**J. Goodman of Fulton County**

With a nearly even split of Democrats and Republicans in the state, I find it baffling that the GOP would propose a map that so blatantly skews that representation. I understand the GOP is scared and this is nothing but a power grab by a desperate and shrinking group, but let's let Democracy work. Stop minimizing the impact of our people of color, draw districts that make sense, and represent common perspectives as the founder so clearly intended. Seven and Seven!!

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11/18/2021**P. Sullivan of Chatham County**

I'm disgusted with this whole process. Maps have not been made available for a meeting for review, instead they're being presented at the last minute. Maps are obviously gerrymandered based on the voting history of Georgia and seem to be specifically targeted to removing individuals from the Democratic Party. Maps are not competitive, and don't get voters choice. I've compared the proposed maps to the benchmarks provided by the Princeton gerrymandering project in fair districts Georgia and they do not measure up. The process, and the maps, are flawed.

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**11/18/2021J. Hartel of Fulton County**

A map that splits a precinct is a terrible map. A map that splits a school or a neighborhood is a terrible map. These maps do all of those things. They (House & Senate maps) take No consideration for communities of interest other than the GOP interest. A District in the shape of a snake is not a fairly drawn district. You Should & Can Do Better! I do not approve these maps!

---

**11/18/2021M. Baron of Fulton County**

I live in CD6 and am very opposed to the latest map drawn for this district. The 2020 census shows that GA is more diverse than in 2010. Rather than reflecting that diversity, these maps pack communities of color into some districts while diluting their votes in others. District 6 is drawn so long and narrow and is obviously gerrymandered to disenfranchise Black voters and prevent Rep. Lucy McBath from keeping the seat. A clear violation of the Voting Rights Act.

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**11/18/2021C. Fuller of Cherokee County**

Don't break up Cherokee County period. Who is responsible for trashing our conservative county. Let me know or I will research. Clark Fuller

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**11/18/2021N. Williams of Cherokee County**

Keep Cherokee County in district 11. Don't give east Cherokee to District 6.

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**11/18/2021A. Lane of DeKalb County**

The proposed Congressional map is blatant gerrymandering. It would remove my county from CD6, and disrupts our relationship w our elected Congresswoman. Furthermore the lack of transparency (posting the maps only hours before the meetings) gives the public no time to review, reflect, or make plans to appear, etc. This is not ethical behavior and seeks to affect future elections. We see you and we don't approve. Why not use the maps from the Princeton Gerrymandering Project? These maps are available for public inspection via these links: [bit.ly/GAFairCongmap1](https://bit.ly/GAFairCongmap1) [bit.ly/GAFairCongmap2](https://bit.ly/GAFairCongmap2) [bit.ly/GAFairCongmap3](https://bit.ly/GAFairCongmap3) [bit.ly/GAFairCongmap4](https://bit.ly/GAFairCongmap4) fair maps are indeed possible.

---

**11/18/2021H. Smart of Athens-Clarke County**

Athens Clarke county is its own community with needs and values that don't always align with our neighboring counties. For those that champion local control, folding ACC into the 10th districts strips us of our local representatives that can advocate on our local issues. ACC voters do not have conservative values as a whole and we will continue to push back and create challenges for politicians that strip us if our voice through unfair re-districting.

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**11/18/2021B. Perry of Glynn County**

Earlier this year, Princeton Gerrymandering Project created a citizen mapping corps by judging the results of a nationwide mapping contest. Their maps avoid partisanship better than any others under consideration and are the very best options for all. Citizens who demonstrated the best map-drawing skills joined the corps. Fair Districts GA challenged the corps to draw maps for Georgia's congressional delegation. They produced 5 maps that meet or beat all the benchmarks: • 8R-6D partisan balance • 2-5 competitive districts • 5-6 minority-majority districts • 9-15 counties split, as good as or better than the committee and caucus-proposed maps. These maps are available for public inspection via these links: [bit.ly/GAFairCongmap1](https://bit.ly/GAFairCongmap1) [bit.ly/GAFairCongmap2](https://bit.ly/GAFairCongmap2) [bit.ly/GAFairCongmap3](https://bit.ly/GAFairCongmap3) [bit.ly/GAFairCongmap4](https://bit.ly/GAFairCongmap4) This demonstration proves that fair maps are indeed possible.

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**11/18/2021A. Meyer of Fulton County**

As a resident of the 6th District, I am fervently against the latest proposed map which extends the 6th district into Dawson county. This map unfairly hurts our fellow Georgians of color and rips from them their representation. It is shameful and it is very apparent what it aims to do to our neighbors. Indirectly, all Georgian are hurt by this map because of the negative publicity it will bring to Georgia.

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**11/18/2021D. O of Cherokee County**

Lucy McBath shares none of my values. Don't want her liberal philosophies and spendthrift ways in East Cherokee. Keep her thieving hand out of my pocketbook. Stop the partisan gerrymandering that rewards corrupt greedy democrats. Keep communities of interest together.

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**11/18/2021B. Willis of Fulton County**

ery disappointed in the blatant power grab and disregard for your constituents. Stop ignoring the voice and will of voters in this state.

---

**11/18/2021E. Lichtenfeld of Cobb County**

The proposed Congressional map does not recognize the needs and will of the people only the needs of the party in power. Following the Princeton Gerrymandering principles would provide FAIR BIPARTISAN maps!

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**11/18/2021C. Matheson of Cherokee County**

Keep cherokee county a single district (district 11), do not split! Eyes are on all of our elected officials now!

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**11/18/2021P. Miner of Cherokee County**

I am absolutely opposed to the proposed gerrymandering of Cherokee County. Please stop.

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**11/18/2021W. Phillips of Cherokee County**

I am totally opposed to the proposed gerrymandering of Cherokee County.

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**11/18/2021N. S of Gwinnett County**

Please stop gerrymandering. You are trying to erase the votes of people of color. The constitution calls for free and fair elections. The redrawing of districts to heavily favor Republicans is anything but that. If you have to scheme to win, what does that say about your character and the fact that you are out of step with the majority of voters in this county, state and country?

---

**11/18/2021V. Hill-Fisher of Cobb County**

Under NO circumstances should the boundary lines be redrawn whats also known as "red- lining" for the self serving interests of political and socioeconomic influences, that does not serve the community inclusiveness . This is NOT comprehensive nor is it reflective of the Majority of Cobb county residents. I strongly oppose this idea and the ramifications that follow for the community in which I live for my family and I.

---

11/18/2021**J. P of Fulton County**

Do legislators even read these comments? The constituents of Georgia sure do. WE ARE FED UP WITH THE GERRYMANDERING!

---

11/18/2021**C. Boender of DeKalb County**

District 6 has a ridiculous new outline to water down the votes of people of color, lumping together Metro Atlanta with rural areas, in order to drive out Lucy McBath. It's well beyond a partisan gerrymander; it's clearly racial. You can see it in some of the other changes, too, because GA is almost/maybe already majority minority and Republicans are scared.

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11/18/2021**B. Powers of DeKalb County**

STOP THE GERRYMANDERING! Forcing right-wing nut jobs into Democrat leaning areas is nothing but a power grab by the gop. FOR SHAME!

---

11/18/2021**J. P of Fulton County**

Keep Cherokee and Forsyth Counties OUT of the Democratic 6th District!!!

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11/18/2021**J. Anderson of Cherokee County**

I love the way some people still support communist democrats. (They also voted for the Marxist) Media propaganda can do wonders. For me? Keep Cherokee County RED and safe from ignorance. Leave it alone!!

---

11/17/2021**J. P of Fulton County**

What's it gonna take for Republicans NOT to rig the map?

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11/17/2021**J. P of Fulton County**

A 9-5 R delegation is not proportional.  $9 \div 14 = 64.29\%$  GA's 2020 results: 49.1% (R), 49.4%(D) Georgia is roughly 50-50 in party support. If you think that Republicans deserve 64.29% of Georgia's voice in the House of Representatives, you need to go back to 2nd grade and relearn fractions.

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11/17/2021**L. Mitchell of Fulton County**

No no no to redistricting!

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11/17/2021**J. P of Fulton County**

KEEP NORTH FULTON BLUE. WE DO NOT WANT TO BE REPRESENTED BY A GREEDY, WHITE-NATIONALIST REPUBLICAN.

---

11/17/2021**D. Woolsey of DeKalb County**

I hope for cute current maps to stay as similar as possible to the current maps. I feel connected to the other citizens in my current district from the state senate, house, and congressional district. I don't want them to be changed outside of slight population adjustments. After viewing the census data myself I see that these new districts have not followed this desire. Many seats have been changed for partisan changes and not to keep communities together.

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11/17/2021**R. Lynch of Cherokee County**

Keep Cherokee County in district 11. Don't give east Cherokee to District 6.

---

11/17/2021**J. Rueckert of Cobb County**

GERRYMANDERING!!! How in the Hell do we go from David Scott to Marjorie "IDIOT" Greene in Cobb County! This is bananas!!!!

---

11/17/2021**D. O'Hare of Fulton County**

Very disappointed by the lack of fair district distribution. My district (the 6th) has clearly been changed dramatically because the GOP wants to boot out Rep. McBath. As a resident of Roswell, I am embarrassed by this power grab by the GOP; sadly I'm not surprised.

---

11/17/2021**J. Donaghy of Cherokee County**

Under no circumstances is Cherokee County to be redistricted. The proposed map is intentionally trying to weaken the vote and we will not stand for it. These subversive and undermining tactics will not be tolerated.

---

11/17/2021**S. M of Fulton County**

You can see this map is a hot mess of bias. District 6 in particular. Figure out how to be fair.

---

11/17/2021**E. Wooden of DeKalb County**

Very disappointed in the blatant power grab and disregard for your constituents. Stop diluting the voice of the people. Stop gerrymandering districts.

---

11/17/2021**S. Hawk of DeKalb County**

As a Republican turned Libertarian turned Independent, I see the need for maps that accurately reflect GA's population. We are a 50/50 purple state. Maps that give Republicans a super-majority are gerrymandering. The GOP-drawn maps are \*not\* reflective of our purple population. The Dem-drawn maps are more fair & balanced. Do better, GOP!

---

11/17/2021**S. Hawk of DeKalb County**

As a Republican turned Libertarian turned Independent, I see the need for maps that accurately reflect GA's population. We are a 50/50 purple state. Maps that give Republicans a super-majority are gerrymandering. The GOP-drawn maps are \*not\* reflective of our purple population. The Dem-drawn maps are more fair & balanced. Do better, GOP!

---

11/17/2021**M. Weiselberg of DeKalb County**

How the hell can you possibly justify giving Republicans 9 of 14 Congressional seats WHEN THEY COULDN'T EVEN WIN THE STATE IN NOVEMBER 2020 OR JANUARY 2021??????? Gerrymandering bastards. Cowards. Losers.

---

11/17/2021**R. Safon of Fulton County**

This is a disgrace--minimizing progressive areas to advantage the right. Gerrymandering!



---

11/17/2021**T. Cappello of Cherokee County**

Please do not split Cherokee county up!!! We are a strong county and need to stay as one!!!! Keep the 11th district as is!!!!

---

11/17/2021**K. Perry of Cherokee County**

No district splitting. We are not willing to split and join the other district. Our votes count!

---

11/17/2021**C. Gregory of Cherokee County**

Keep our county in District 11. Keep our county strong. Do not divide us.

---

11/17/2021**J. Archer of Cherokee County**

Under NO circumstances is Cherokee County to be redistricted. The map that has been proposed is intentionally trying to weaken our strong RED vote and we will not stand for it! I am a FIRM NO to the proposed redistricting!

---

11/17/2021**H. Haas of Bartow County**

It is disturbing that David Ralston, who is supposed to be fighting for Republican voters, is actually giving away one of our seats just to be vindictive against someone who is interested in election integrity. This cannot be allowed. We support Philip Singleton in Bartow County!

---

11/17/2021**K. P of DeKalb County**

This is the horrendous map possible. Republicans can't win, so they cheat and claim the other side cheated. This the greatest injustice to People of color and shows how corrupt and morally bankrupt Republicans are.

---

11/17/2021**M. Stomblor of DeKalb County**

I'm so disappointed looking at the maps. This is so unethical. Why do some legislators need to cheat to win. This gerrymandering is anti-democratic. Sickening.

---

11/17/2021**W. Payne of Cobb County**

I have just looked at the most recent proposed map and I am very disappointed. I live in the 6th district and feel like we finally have good representation for middle class professional people like me. I feel that my area has way more in common with the rest of Cobb County rather than Forsyth and Dawson Counties. It looks like gerrymandering just might get us a MAGA idiot as a representative that is only concerned with "stop the steal" and QAnon rather than the needs of my district. I would prefer competitive, equally distributed districts that truly reflect the population growth of the state in the last decade.

---

11/17/2021**S. Schneider of Fulton County**

Competitive districts are essential to democracy and a vital Georgia. Only when districts are competitive, including partisan competition, are office holders open to public input. As an engaged citizen, I want to give input about legislation or public issues via email or face to face. When a district is not competitive, only high powered stake holders are listened to, town hall events are non-existent and only high dollar events are held. Indifference of an office holder to public input undermines healthy, safe and thriving communities. I live in House Dist#6 and only recently has public input been welcomed.



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11/17/2021**A. Swygert of DeKalb County**

The Senate Redistricting Committee Chair seems to be confused by what "gerrymandering" means as he claims that their proposed maps aren't gerrymandered. Gerrymandering is when one party purposely draws district lines to disadvantage the other. It is clear that all maps are gerrymandered as they unfairly benefit the Republican party in a 50/50 state. Racial gerrymandering is when districts are drawn to disadvantage people of color. All maps short-change GA's growing minority population by not adding enough minority-majority districts. Sadly, "gerrymandering" is alive and well in GA in 2021. Republicans will no longer have bragging rights when these maps will be challenged in court.

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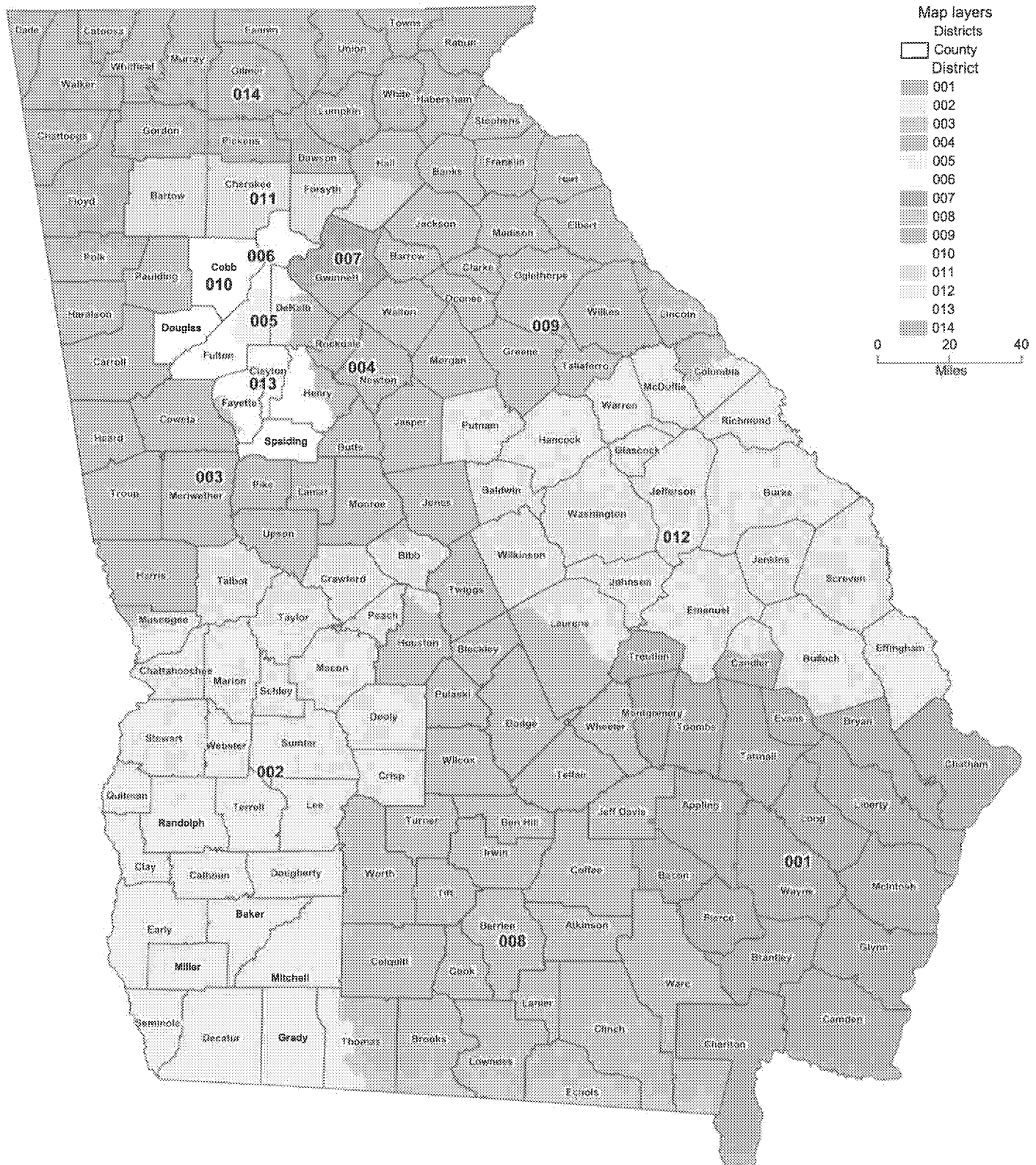
11/17/2021**D. Taggart of Fulton County**

I was on the livestream of our fellow citizens, including a HUGE contingent of self-described Republicans from Coweta County, Peachtree City, and Fayetteville passionately take the (Republican) Committee members to task for splitting up their communities, & for refusing to give citizens enough time to give their feedback. There was plenty of outrage to go around, for everyone in Metro ATL. Peachtree City, Dunwoody are being split up, Lawrenceville, the county seat of Gwinnett County will be in Hall County's district, & Buckhead will be mostly in 2 literally Salamander shaped districts that look like they locked jaws in a death grip from opposing directions, then someone stepped on them, flattened them. Who can possibly represent both Buckhead & SW Atlanta??(HD60) Even Chastain Park (HD53)has been split up at Lake Forrest Rd! These communities deserve their respective appropriate representation. I learned in school that gerrymandering was evil, it was the opposite of democracy. It is.

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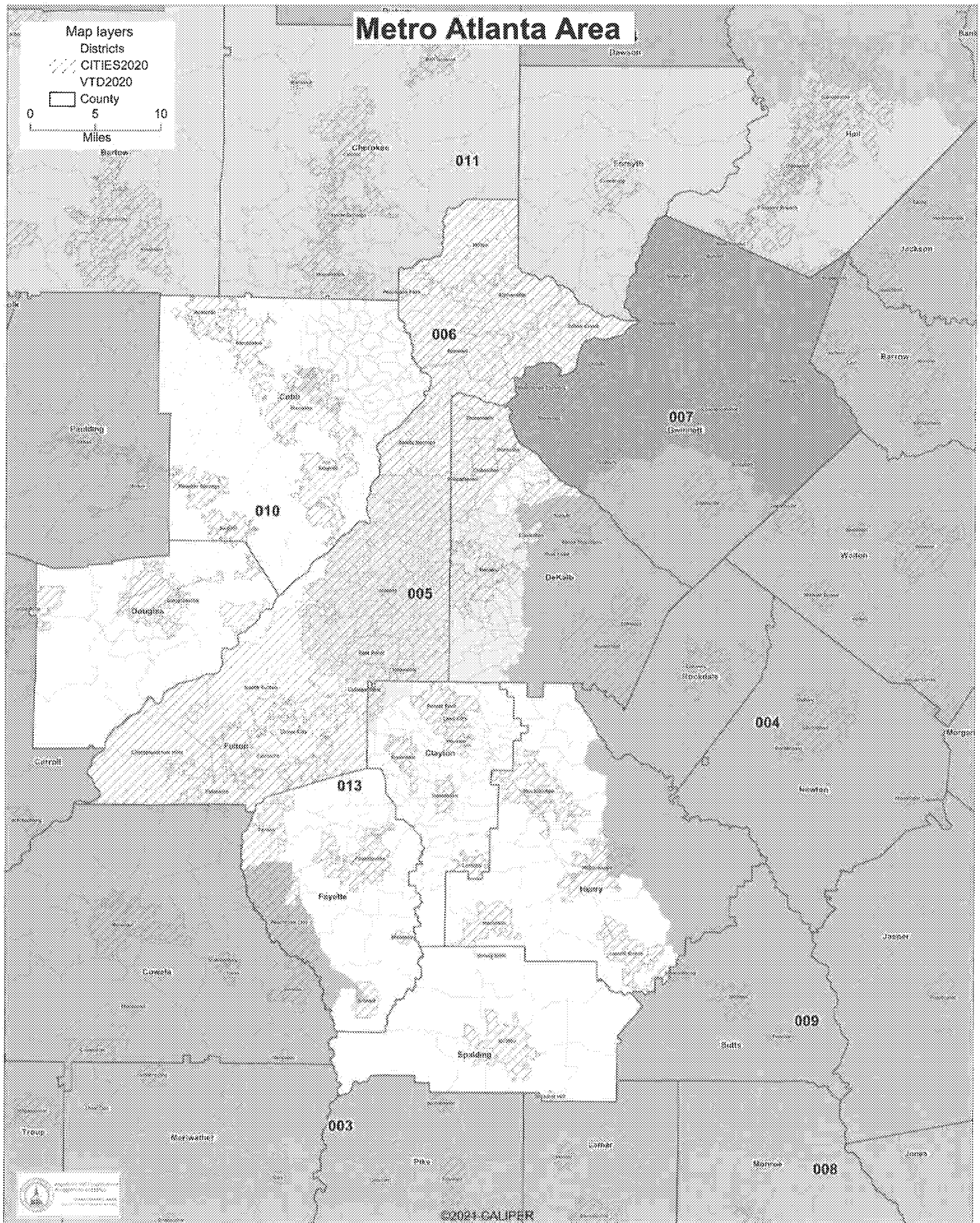
# Proposed Georgia Congressional Districts

client: HD143  
type: Congress  
plan: GHDC-GSDC-CongPlan1



# Proposed Georgia Congressional Districts

client: HD143  
type: Congress  
plan: GHDC-GSDC-CongPlan1



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:23 AM

**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_Whi]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	590,786	77.21%	56.59%	28.29%	8.28%	2.13%	0.23%	0.15%	0.42%	3.9%
002	765,135	-1	0.00%	587,666	76.81%	39.33%	49.92%	5.84%	1.24%	0.2%	0.09%	0.34%	3.05%
003	765,137	1	0.00%	581,128	75.95%	67.53%	19.58%	6.22%	1.92%	0.22%	0.05%	0.46%	4.02%
004	765,136	0	0.00%	579,213	75.7%	24.78%	58.52%	7.8%	4.46%	0.18%	0.04%	0.67%	3.56%
005	765,137	1	0.00%	623,102	81.44%	36.44%	47.63%	6.69%	4.87%	0.16%	0.03%	0.54%	3.64%
006	765,137	1	0.00%	588,726	76.94%	56.04%	12.14%	14%	12.77%	0.13%	0.04%	0.77%	4.12%
007	765,135	-1	0.00%	567,115	74.12%	32.17%	23.82%	25.63%	14.13%	0.15%	0.04%	0.65%	3.41%
008	765,136	0	0.00%	583,936	76.32%	59.13%	28.34%	7.34%	1.51%	0.2%	0.05%	0.31%	3.13%
009	765,137	1	0.00%	594,668	77.72%	70.26%	15.06%	8.18%	2.22%	0.19%	0.03%	0.47%	3.6%
010	765,137	1	0.00%	590,424	77.17%	35.53%	41.44%	14.45%	3.49%	0.18%	0.05%	0.86%	4%
011	765,137	1	0.00%	570,405	74.55%	66.31%	6.64%	15.25%	7.22%	0.19%	0.04%	0.49%	3.86%
012	765,136	0	0.00%	589,460	77.04%	52.15%	36.34%	5.1%	1.93%	0.22%	0.11%	0.38%	3.77%
013	765,135	-1	0.00%	575,033	75.15%	25.7%	56.41%	10.3%	3.38%	0.19%	0.04%	0.66%	3.31%
014	765,136	0	0.00%	598,612	78.24%	78.85%	4.31%	11.74%	0.91%	0.24%	0.03%	0.28%	3.64%

**Total: 10,711,908****Ideal District: 765,136**



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:25 AM

**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

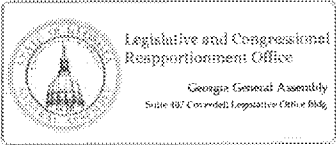
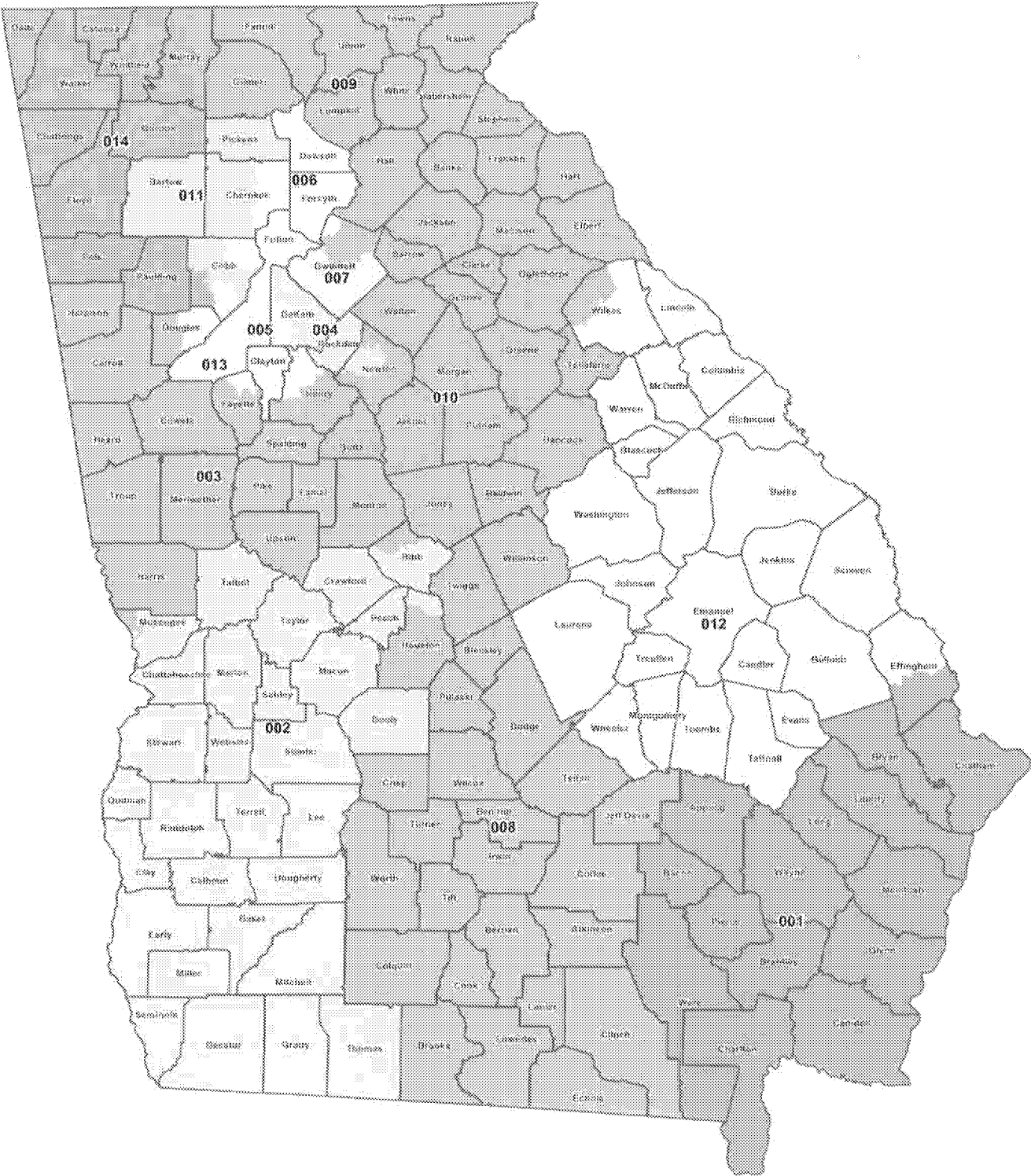
District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2 + Races]
001	765,137	1	0.00%	590,786	77.21%	59.51%	27.16%	7.2%	2.3%	0.24%	0.14%	0.36%	3.1%
002	765,135	-1	0.00%	587,666	76.81%	42.21%	48.38%	5.03%	1.31%	0.22%	0.09%	0.27%	2.49%
003	765,137	1	0.00%	581,128	75.95%	69.81%	19.11%	5.3%	1.92%	0.22%	0.06%	0.37%	3.22%
004	765,136	0	0.00%	579,213	75.7%	27.14%	57.92%	6.72%	4.33%	0.18%	0.04%	0.6%	3.07%
005	765,137	1	0.00%	623,102	81.44%	38.63%	46.2%	6.14%	5.17%	0.16%	0.04%	0.49%	3.17%
006	765,137	1	0.00%	588,726	76.94%	58.57%	12.48%	12.32%	12.44%	0.12%	0.04%	0.69%	3.35%
007	765,135	-1	0.00%	567,115	74.12%	34.96%	23.37%	23.1%	15.07%	0.15%	0.04%	0.54%	2.76%
008	765,136	0	0.00%	583,936	76.32%	61.62%	27.63%	6.23%	1.56%	0.21%	0.05%	0.24%	2.46%
009	765,137	1	0.00%	594,668	77.72%	72.75%	14.61%	6.83%	2.25%	0.2%	0.03%	0.4%	2.93%
010	765,137	1	0.00%	590,424	77.17%	38.71%	40.7%	12.5%	3.66%	0.19%	0.05%	0.8%	3.4%
011	765,137	1	0.00%	570,405	74.55%	70.01%	6.6%	13.09%	6.49%	0.18%	0.04%	0.42%	3.16%
012	765,136	0	0.00%	589,460	77.04%	54.64%	35.25%	4.45%	2.04%	0.23%	0.1%	0.32%	2.97%
013	765,135	-1	0.00%	575,033	75.15%	28.57%	55.4%	8.86%	3.57%	0.2%	0.04%	0.59%	2.76%
014	765,136	0	0.00%	598,612	78.24%	81.74%	4.22%	9.46%	0.92%	0.25%	0.03%	0.23%	3.14%

**Total: 10,711,908****Ideal District: 765,136**

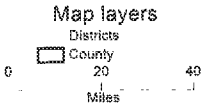


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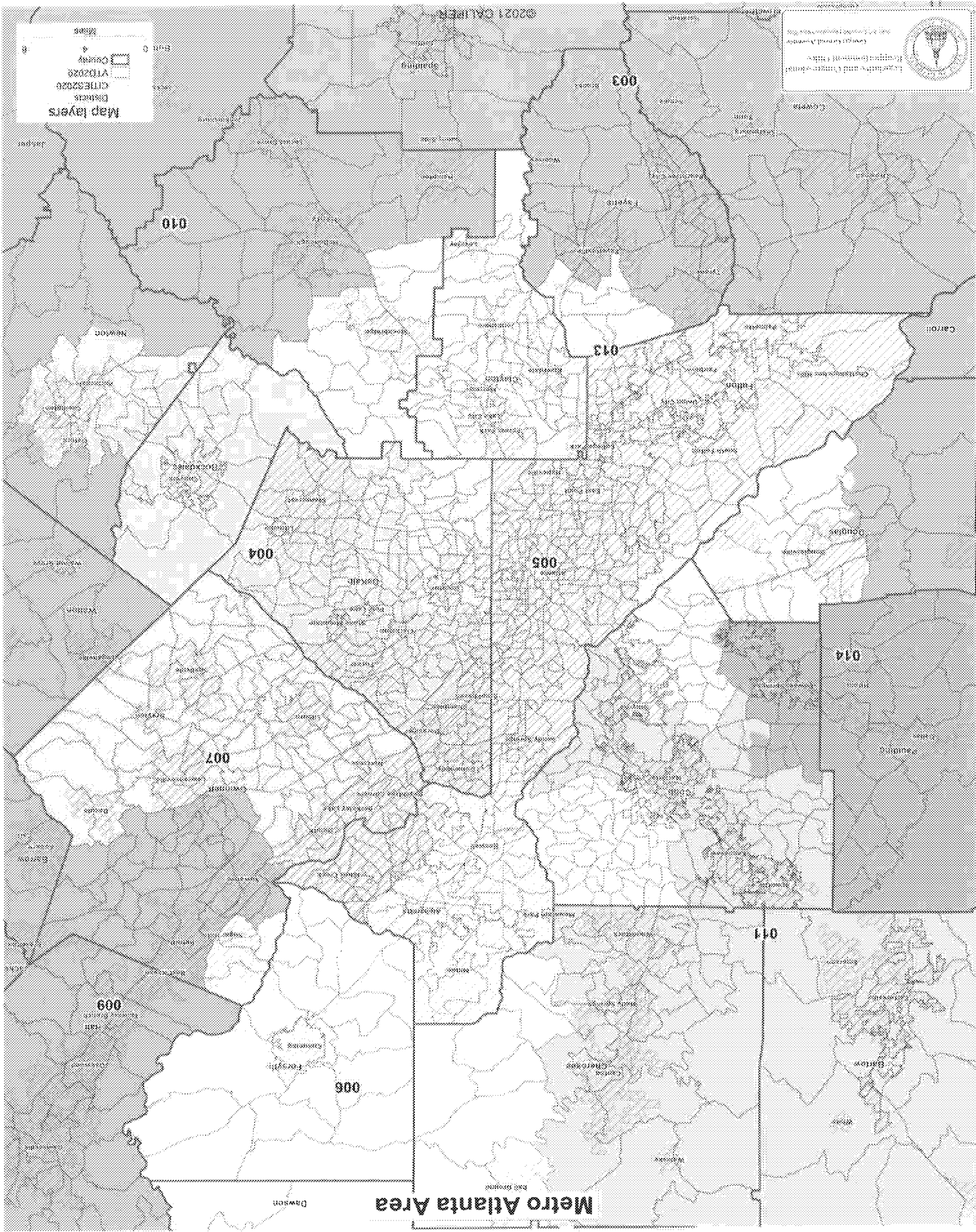
# Proposed Joint Congressional Districts of Georgia



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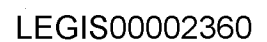


Client: S018  
Plan: Congress-propt-2021  
Type: Congress  
Proposed Joint Congressional Districts of Georgia





A detailed map of Bibb County, Georgia, showing its various precincts and legislative districts. The map is titled "Bibb County Area" in a bold, black font at the top center. The precincts are labeled with names and numbers, such as "HOWARD 1", "HOWARD 2", "HOWARD 3", "HOWARD 4", "HOWARD 5", "HOWARD 6", "HOWARD 7", "HOWARD 8", "HOWARD 9", "HOWARD 10", "HOWARD 11", "HOWARD 12", "HOWARD 13", "HOWARD 14", "HOWARD 15", "HOWARD 16", "HOWARD 17", "HOWARD 18", "HOWARD 19", "HOWARD 20", "HOWARD 21", "HOWARD 22", "HOWARD 23", "HOWARD 24", "HOWARD 25", "HOWARD 26", "HOWARD 27", "HOWARD 28", "HOWARD 29", "HOWARD 30", "HOWARD 31", "HOWARD 32", "HOWARD 33", "HOWARD 34", "HOWARD 35", "HOWARD 36", "HOWARD 37", "HOWARD 38", "HOWARD 39", "HOWARD 40", "HOWARD 41", "HOWARD 42", "HOWARD 43", "HOWARD 44", "HOWARD 45", "HOWARD 46", "HOWARD 47", "HOWARD 48", "HOWARD 49", "HOWARD 50", "HOWARD 51", "HOWARD 52", "HOWARD 53", "HOWARD 54", "HOWARD 55", "HOWARD 56", "HOWARD 57", "HOWARD 58", "HOWARD 59", "HOWARD 60", "HOWARD 61", "HOWARD 62", "HOWARD 63", "HOWARD 64", "HOWARD 65", "HOWARD 66", "HOWARD 67", "HOWARD 68", "HOWARD 69", "HOWARD 70", "HOWARD 71", "HOWARD 72", "HOWARD 73", "HOWARD 74", "HOWARD 75", "HOWARD 76", "HOWARD 77", "HOWARD 78", "HOWARD 79", "HOWARD 80", "HOWARD 81", "HOWARD 82", "HOWARD 83", "HOWARD 84", "HOWARD 85", "HOWARD 86", "HOWARD 87", "HOWARD 88", "HOWARD 89", "HOWARD 90", "HOWARD 91", "HOWARD 92", "HOWARD 93", "HOWARD 94", "HOWARD 95", "HOWARD 96", "HOWARD 97", "HOWARD 98", "HOWARD 99", "HOWARD 100". The districts are labeled with numbers: "DISTRICT 1", "DISTRICT 2", "DISTRICT 3", "DISTRICT 4", "DISTRICT 5", "DISTRICT 6", "DISTRICT 7", "DISTRICT 8", "DISTRICT 9", "DISTRICT 10", "DISTRICT 11", "DISTRICT 12", "DISTRICT 13", "DISTRICT 14", "DISTRICT 15", "DISTRICT 16", "DISTRICT 17", "DISTRICT 18", "DISTRICT 19", "DISTRICT 20", "DISTRICT 21", "DISTRICT 22", "DISTRICT 23", "DISTRICT 24", "DISTRICT 25", "DISTRICT 26", "DISTRICT 27", "DISTRICT 28", "DISTRICT 29", "DISTRICT 30", "DISTRICT 31", "DISTRICT 32", "DISTRICT 33", "DISTRICT 34", "DISTRICT 35", "DISTRICT 36", "DISTRICT 37", "DISTRICT 38", "DISTRICT 39", "DISTRICT 40", "DISTRICT 41", "DISTRICT 42", "DISTRICT 43", "DISTRICT 44", "DISTRICT 45", "DISTRICT 46", "DISTRICT 47", "DISTRICT 48", "DISTRICT 49", "DISTRICT 50", "DISTRICT 51", "DISTRICT 52", "DISTRICT 53", "DISTRICT 54", "DISTRICT 55", "DISTRICT 56", "DISTRICT 57", "DISTRICT 58", "DISTRICT 59", "DISTRICT 60", "DISTRICT 61", "DISTRICT 62", "DISTRICT 63", "DISTRICT 64", "DISTRICT 65", "DISTRICT 66", "DISTRICT 67", "DISTRICT 68", "DISTRICT 69", "DISTRICT 70", "DISTRICT 71", "DISTRICT 72", "DISTRICT 73", "DISTRICT 74", "DISTRICT 75", "DISTRICT 76", "DISTRICT 77", "DISTRICT 78", "DISTRICT 79", "DISTRICT 80", "DISTRICT 81", "DISTRICT 82", "DISTRICT 83", "DISTRICT 84", "DISTRICT 85", "DISTRICT 86", "DISTRICT 87", "DISTRICT 88", "DISTRICT 89", "DISTRICT 90", "DISTRICT 91", "DISTRICT 92", "DISTRICT 93", "DISTRICT 94", "DISTRICT 95", "DISTRICT 96", "DISTRICT 97", "DISTRICT 98", "DISTRICT 99", "DISTRICT 100". The map also shows major roads, including US Highway 1, US Highway 2, US Highway 3, US Highway 4, US Highway 5, US Highway 6, US Highway 7, US Highway 8, US Highway 9, US Highway 10, US Highway 11, US Highway 12, US Highway 13, US Highway 14, US Highway 15, US Highway 16, US Highway 17, US Highway 18, US Highway 19, US Highway 20, US Highway 21, US Highway 22, US Highway 23, US Highway 24, US Highway 25, US Highway 26, US Highway 27, US Highway 28, US Highway 29, US Highway 30, US Highway 31, US Highway 32, US Highway 33, US Highway 34, US Highway 35, US Highway 36, US Highway 37, US Highway 38, US Highway 39, US Highway 40, US Highway 41, US Highway 42, US Highway 43, US Highway 44, US Highway 45, US Highway 46, US Highway 47, US Highway 48, US Highway 49, US Highway 50, US Highway 51, US Highway 52, US Highway 53, US Highway 54, US Highway 55, US Highway 56, US Highway 57, US Highway 58, US Highway 59, US Highway 60, US Highway 61, US Highway 62, US Highway 63, US Highway 64, US Highway 65, US Highway 66, US Highway 67, US Highway 68, US Highway 69, US Highway 70, US Highway 71, US Highway 72, US Highway 73, US Highway 74, US Highway 75, US Highway 76, US Highway 77, US Highway 78, US Highway 79, US Highway 80, US Highway 81, US Highway 82, US Highway 83, US Highway 84, US Highway 85, US Highway 86, US Highway 87, US Highway 88, US Highway 89, US Highway 90, US Highway 91, US Highway 92, US Highway 93, US Highway 94, US Highway 95, US Highway 96, US Highway 97, US Highway 98, US Highway 99, US Highway 100. The map is a grayscale image with a grid overlay.



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



PUBLIC

## **2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### III. REDISTRICTING PLANS

#### A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

#### B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
  - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.



AVAILABLE



# HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE RULES 2021-2022

1. The quorum for the committee shall be **six (6)** members.
2. The committee shall convene, recess, and adjourn upon the order of the Chair.
3. A bill, resolution, or other matter will be considered only after being presented by its principal sponsor or a legislator designated by the principal sponsor. When a bill or resolution is placed on the committee agenda, the principal sponsor shall be notified of the time and place of the meeting. No bill shall be placed on the calendar of the House Legislative and Congressional Reapportionment Committee **unless a request is made to the Chair** in writing.
4. The Chair shall establish the meeting agenda and determine the measures to be considered and the order of consideration.
5. Action may be taken on a bill or resolution at its first presentation to the committee, at the discretion of the Chair.
6. The Chair may appoint subcommittees and officers of subcommittees and, at the discretion of the Chair, refer any matter to a subcommittee; but **no** measure will be reported to the House except after consideration by the full committee.
7. During committee meetings, committee members and all members of the public shall turn off or place in silent mode all cell phones, pagers, and other similar devices.
8. The Chair may present to the committee a proposed change in these rules at any time.
9. The Rules of the House shall control any case not provided for in these rules.
10. Officers of the committee shall be ex-officio **voting members** of all subcommittees.
11. All hearings will be at the direction of the Chair.
12. Committee discussion may be limited by the Chair.

NOT  
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①

HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE

SPEAKER SIGN-IN SHEET

FIRST AND LAST NAME	ORGANIZATION (IF ANY)	EMAIL ADDRESS	RESIDENTIAL ADDRESS	PHONE NUMBER	COUNTY OF RESIDENCE
✓ Ken Lawler	Fair Districts GA				Fulton
✓ Karen Davenport		Krdavenport1@bellsouth.net	3638 John Carroll Dr Decatur, Ga 30037	404-444-4352	DeKalb
✓ <del>Erica Thomas</del>	Georgia General Assembly				
✓ Leroy Hutchins			Austell		Cobb
✓ Geovani Serrano	GLAHR Action Network	actionnet.geovani@gmail.com	2550 Chippewa Court Duluth, GA	706 325 5580	Gwinnett
✓ Ron Davis	Austell Community Improvement	rsdavis1925@gmail.com	Austell	404-414-4495	Cobb
✓ Mindy Seger	Fair Districts GA - voter	mseger79@gmail.com	Maricetta 30062	678-651-5471	Cobb
✓ Vasu Abhiramhan	ACLU of Georgia				
✓ Julie Bolen	League of Women Voters	juliebolen@bellsouth.net	Maricetta 30062	678-938-8140	Cobb
✓ Julia Leon	Fair Districts GA	julia.h.leon@gmail.com	Decatur, GA	404-487-8558	DeKalb
✓ John Mofe	Urban League	jmofoe@ulgaatl.org	Gwinnett	404-809-5426	

1/2

Thursday 11/18/21 - 12:00 PM 40/6 CLUB HYBRID

2

# HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE

## SPEAKER SIGN-IN SHEET

FIRST AND LAST NAME	ORGANIZATION (IF ANY)	EMAIL ADDRESS	RESIDENTIAL ADDRESS	PHONE NUMBER	COUNTY OF RESIDENCE
✓ Cynthia Battles	People's Agenda				
✓ David Garcia	GAIGO				
<del>Gerardo Serrano</del>	<del>GLAIR</del>				
<del>Julie Bolen</del>	<del>LWR</del>				
<del>Ken Fowler</del>	<del>Fair Districts</del>				
✓ Salik Sohani	GMVP				
✓ Valerie Tegman	Resident/Artist				

2/2

# EXHIBIT 4





PUBLIC



**BONNIE RICH**  
Representative, District 97  
PO Box 663  
Suwanee, Georgia 30024  
Bonnie.Rich@house.ga.gov

**House of Representatives**  
COVERDELL LEGISLATIVE OFFICE BLDG  
18 CAPITOL SQUARE, SUITE 402  
ATLANTA, GEORGIA 30334  
(404) 656-5087 (Office)

**STANDING COMMITTEES**  
**Legislative & Congressional**  
**Reapportionment; Chairman**  
Education, Judiciary,  
Retirement, Ways & Means,  
Special Committee on Access to  
Civil Justice System  
Special Committee on Election Integrity

## UPDATED AGENDA

November 19, 2021

TO: House Legislative and Congressional Reapportionment Committee

FROM: Representative Bonnie Rich, Chairman

The House Legislative and Congressional Reapportionment Committee will have a meeting on Saturday, November 20, 2021, 9:00 a.m. to 11:00 a.m. in Room 406 CLOB. The meeting will be available to the public via livestream on the [House Broadcast webpage](#).

### AGENDA:

- Consideration and public comment of SB 2EX
- Consideration and public comment of HB 5EX

*\*Agenda subject to change at the discretion of the Chair*

Members of the public are invited to provide testimony or comments. If you are a Georgia resident and would like to **sign up to speak via Zoom for this virtual-only meeting**, please visit the [House Redistricting Committee website](#) and click on the "Sign Up To Speak" button to sign up. Testimony should be between 2-5 minutes. Time limits are subject to change depending on how many individuals sign up to speak.

If you do not wish to speak, there is no need to sign up to view the meeting; it will be livestreamed from the Georgia General Assembly website here: <https://www.legis.ga.gov/>.

The public is invited to submit written comments at any time via this [LINK](#). You can also access the link through the General Assembly, House, Senate, or Joint Reapportionment webpages; just look for the banner at the top of each page. The link is also located on the [House](#) and [Senate](#) reapportionment committee webpages.

For more information on redistricting and reapportionment in Georgia, please visit the Legislative and Congressional Reapportionment website here: <https://www.legis.ga.gov/joint-office/reapportionment>.

cc: Speaker's Office  
Clerk's Office  
Legislative Counsel

Policy Analyst  
Fiscal Office  
Media Services

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### Microphone List:

~~27 Alexander~~  
~~18 Setzler~~  
~~22 L. Smith~~

406, 506, or 606 CLOB

1	2	3	4	5	6	7	8	9	10	11	12

					SETZLER			RICH	TAYLOR	L. SMITH				SCOTT	ALEXANDER		
13	14	15	16	17	18	19	20	CHAIR	21	22	23	24	25	26	27	28	29



AVAILABLE

Legislative and Congressional Reapportionment Committee Attendance  
2021

Date: 11/20/21 Room: 4106 CLUB Time: 9:00 AM

- ☒ Bonnie Rich - Chair
- ☒ Darlene Taylor - Vice Chair
- ☐ Susan Holmes - Secretary
- ☒ Kimberly Alexander
- ☒ Mandi Ballinger (VIRTUAL)
- ☐ Buddy DeLoach
- ☒ Matt Dollar (VIRTUAL)
- ☒ Chuck Efstration (VIRTUAL)
- ☒ Barry Fleming (VIRTUAL)
- ☐ Carl Gilliard
- ☒ Mack Jackson (VIRTUAL)
- ☒ Jan Jones (VIRTUAL)
- ☒ Randy Nix (VIRTUAL)
- ☒ Brian Prince (VIRTUAL)
- ☒ Sandra Scott
- ☒ Ed Setzler
- ☒ Lynn Smith
- ☒ Richard Smith (VIRTUAL)

TOTAL PRESENT 15

AVAILABLE

# Legislative and Congressional Reapportionment Committee Roll Call Vote

**BILL #** SB 2 EX - Amendment proposed by Rep. Kimberly Alexander  
**MOTION:** Motion to Adopt Amendment

MOTION BY: Rep. Kimberly Alexander  
SECOND: Rep. Sandra Scott

YAY	NAY	
<input type="checkbox"/>	<input type="checkbox"/>	Bonnie Rich, Chair
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Darlene Taylor, Vice Chair
<input type="checkbox"/>	<input type="checkbox"/>	Susan Holmes, Secretary
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Kimberly Alexander
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Mandi Ballinger
<input type="checkbox"/>	<input type="checkbox"/>	Buddy DeLoach
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Matt Dollar
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chuck Efstration
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Barry Fleming
<input type="checkbox"/>	<input type="checkbox"/>	Carl Gilliard
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mack Jackson
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Jan Jones
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Randy Nix
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Brian Prince
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sandra Scott
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ed Setzler
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Lynn Smith
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Richard Smith

## VOTE TOTALS:

YAYS: 4 NAYS: 10

Amendment  
**ACTION:** Failed

AVAILABLE

Legislative and Congressional Reapportionment Committee  
Roll Call Vote

BILL # SB 2EX - LC 47 11065 (SCS)  
MOTION: DO PASS

MOTION BY: Rep. Lynn Smith  
SECOND: Rep. Ed Setzler

YAY	NAY	
<input type="checkbox"/>	<input type="checkbox"/>	Bonnie Rich, Chair
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Darlene Taylor, Vice Chair
<input type="checkbox"/>	<input type="checkbox"/>	Susan Holmes, Secretary
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Kimberly Alexander
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mandi Ballinger
<input type="checkbox"/>	<input type="checkbox"/>	Buddy DeLoach
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Matt Dollar
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chuck Efstration
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Barry Fleming
<input type="checkbox"/>	<input type="checkbox"/>	Carl Gilliard
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Mack Jackson
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Jan Jones
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Randy Nix
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Brian Prince
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Sandra Scott
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ed Setzler
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Lynn Smith
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Richard Smith

VOTE TOTALS:

YAYS: 10 NAYS: 4

ACTION: DO PASS



NOT  
PUBLIC

BEFORE PUBLIC COMMENT:

Following the conclusion of the public testimony, we ask the members of the public who have joined us via Zoom to exit the Zoom call so that we can take up official committee business with committee members only on the Zoom call. The meeting will continue to be live streamed and members of the public are invited to continue viewing the remainder of the meeting via the publically-available live stream on the House website.

AFTER PUBLIC COMMENT:

Now that public comment has concluded, we again ask any members of the public to exit the Zoom call so that the committee members can continue with the official business of the committee. The public is invited to continue viewing the meeting via the live stream that is available on the House website. We will take a brief 2-3 minute break to allow adequate time for anyone who wishes to transition from the Zoom call to the live stream. We will remove any remaining non-committee members from the Zoom call at the conclusion of our break.

PUBLIC

## **2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### III. REDISTRICTING PLANS

#### A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

#### B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
  - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,



and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

AVAILABLE



**HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT  
COMMITTEE RULES  
2021-2022**

1. The quorum for the committee shall be **six (6)** members.
2. The committee shall convene, recess, and adjourn upon the order of the Chair.
3. A bill, resolution, or other matter will be considered only after being presented by its principal sponsor or a legislator designated by the principal sponsor. When a bill or resolution is placed on the committee agenda, the principal sponsor shall be notified of the time and place of the meeting. No bill shall be placed on the calendar of the House Legislative and Congressional Reapportionment Committee **unless a request is made to the Chair** in writing.
4. The Chair shall establish the meeting agenda and determine the measures to be considered and the order of consideration.
5. Action may be taken on a bill or resolution at its first presentation to the committee, at the discretion of the Chair.
6. The Chair may appoint subcommittees and officers of subcommittees and, at the discretion of the Chair, refer any matter to a subcommittee; but **no** measure will be reported to the House except after consideration by the full committee.
7. During committee meetings, committee members and all members of the public shall turn off or place in silent mode all cell phones, pagers, and other similar devices.
8. The Chair may present to the committee a proposed change in these rules at any time.
9. The Rules of the House shall control any case not provided for in these rules.
10. Officers of the committee shall be ex-officio **voting members** of all subcommittees.
11. All hearings will be at the direction of the Chair.
12. Committee discussion may be limited by the Chair.

PUBLIC

21

LC 47 1166S (SCS)

Senate Bill 2EX

By: Senators Kennedy of the 18<sup>th</sup>, Cowser of the 46<sup>th</sup>, Dugan of the 30<sup>th</sup>, Gooch of the 51<sup>st</sup>,  
Burke of the 11<sup>th</sup> and others

A BILL TO BE ENTITLED  
AN ACT

1 To provide for the composition and number of congressional districts; to provide for a short  
2 title; to provide when such representatives shall take office; to provide for continuation of  
3 present congressional districts until a certain time; to provide for related matters; to provide  
4 an effective date; to repeal provisions of a specific Act; to repeal conflicting laws; and for  
5 other purposes.

6 BE IT ENACTED BY THE GENERAL ASSEMBLY OF GEORGIA:

7 SECTION 1.

8 This Act shall be known and may be cited as the "Georgia Congressional Redistricting Act  
9 of 2021."

10 SECTION 2.

11 (a) For the purpose of electing representatives to the Congress of the United States, the  
12 State of Georgia is divided into 14 congressional districts. Such congressional districts  
13 shall be and correspond to those 14 numbered districts described in Appendix A,  
14 incorporated into and made a part of this Act and further identified as "User: S018 Plan  
15 Name: Congress-prop1-2021 Plan Type: Congress."

S. B. 2EX

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(b) For the purposes of such plan:

(1) The term "VTD" shall mean and describe the same geographical boundaries as provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia. The separate numeric designations in a district description which are underneath a "VTD" heading shall mean and describe individual Blocks within a VTD as provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia; and

(2) Whenever the description of any congressional district refers to a named county without any additional VTD, it shall mean the geographical boundaries of that county as shown on the census maps for the United States decennial census of 2020 for the State of Georgia.

(c) Any part of the State of Georgia which is not included in any congressional district described in subsection (a) of this section shall be included within that district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.

(d) Any part of the State of Georgia which is described in subsection (a) of this section as being included in a particular congressional district shall nevertheless not be included within such congressional district if such part is not contiguous to such congressional district. Such noncontiguous part shall instead be included within that congressional district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.

(e) The first representatives to the Congress of the United States elected pursuant to the provisions of this Act shall be those who are elected to take office in January, 2023. Until that time:

(1) The representatives to the Congress of the United States elected in 2020 shall continue to serve and shall represent the districts from which elected;

21

LC 47 1166S (SCS)

42 (2) The composition of the districts from which such representatives were elected shall  
43 remain the same; and

44 (3) Any special election to fill a vacancy in the 117th Congress of the United States shall  
45 use the composition of districts used for the 2020 general election for representatives to  
46 the Congress of the United States.

47 (f) The provisions of this Act shall be effective for the primaries and elections of 2022 for  
48 the purpose of electing the representatives who are to take office in 2023. Successors to  
49 those representatives and future successors shall likewise be elected under the provisions  
50 of this Act.

51

**SECTION 3.**

52 The description of Congressional Districts 1 through 14 provided for pursuant to this Act  
53 shall supersede and replace the description of Congressional Districts 1 through 14 provided  
54 in an Act approved September 6, 2011 (Ga. L. 2011, Ex. Sess., p. 208).

55

**SECTION 4.**

56 This Act shall become effective upon its approval by the Governor or upon its becoming law  
57 without such approval.

58

**SECTION 5.**

59 Section 2 of an Act to provide for the composition and number of congressional districts,  
60 approved September 6, 2011 (Ga. L. 2011, Ex. Sess., p. 208), is hereby repealed in its  
61 entirety.

62

**SECTION 6.**

63 All laws and parts of laws in conflict with this Act are repealed.

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LC 47 1166S (SCS)

64

## Appendix A

65 User: S018

66 Plan Name: Congress-prop1-2021

67 Plan Type: Congress

68 District 001

69 County Appling GA

70 County Bacon GA

71 County Brantley GA

72 County Bryan GA

73 County Camden GA

74 County Charlton GA

75 County Chatham GA

76 County Effingham GA

77 VTD 1A

78 VTD 1B

79 VTD 1C

80 VTD 1D

81 VTD 2A

82 VTD 2B

83 VTD 2C

84 VTD 4B

S. B. 2EX

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85 Block 030209:

86 1032 1047 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009

87 2010 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022

88 2023 2024 2025 2026 2027 2028 2029 2030

89 Block 030301:

90 4000 4001 4002 4003 4025

91 Block 030303:

92 2007 2008 2009 2010 2011 2012 2024 2026 2028

93 Block 030306:

94 2007 2008 2019 2021 2022 2023 2024 2025 2026 2027 2028 2029

95 2030 2031 2032 2036 2037 2038 2039 2040 2041 2042 2043 2044

96 Block 030307:

97 1024 1025 1026 1027 1030 1031 1032 1040

98 VTD 4C

99 VTD 5A

100 VTD 5B

101 VTD 5C

102 County Glynn GA

103 County Liberty GA

104 County Long GA

105 County McIntosh GA

106 County Pierce GA

107 County Ware GA

108 County Wayne GA

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109 District 002  
110 County Baker GA  
111 County Bibb GA  
112 VTD EAST MACON 1  
113 VTD EAST MACON 2  
114 VTD EAST MACON 3  
115 VTD EAST MACON 4  
116 VTD EAST MACON 5  
117 VTD GODFREY 1  
118 VTD GODFREY 2  
119 VTD GODFREY 3  
120 VTD GODFREY 4  
121 VTD GODFREY 5  
122 VTD HAZZARD 1  
123 VTD HAZZARD 3  
124 VTD HOWARD 2  
125 Block 013412:  
126 2025  
127 VTD RUTLAND 1  
128 VTD RUTLAND 2  
129 VTD VINEVILLE 1  
130 VTD VINEVILLE 2  
131 VTD VINEVILLE 3  
132 VTD VINEVILLE 4  
133 VTD VINEVILLE 6

S. B. 2EX

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LEGIS00002402

134 Block 010200:  
 135 1006 1007 1008 1009 1010 1011 1012 1013 1014 1030 1031 1032  
 136 1033 1034  
 137 Block 011800:  
 138 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 139 1012 1013 1014 1015 1016 1017 1018 2012 2016 3026 3027 3028  
 140 Block 012200:  
 141 1001 1002 1003 1004 1005 1006 1011  
 142 Block 014000:  
 143 4000 4001 4002 4003 4004 4005 4006 4007 4008 4009 4010 4011  
 144 VTD WARRIOR 1  
 145 VTD WARRIOR 2  
 146 County Calhoun GA  
 147 County Chattahoochee GA  
 148 County Clay GA  
 149 County Crawford GA  
 150 County Decatur GA  
 151 County Dooly GA  
 152 County Dougherty GA  
 153 County Early GA  
 154 County Grady GA  
 155 County Houston GA  
 156 VTD CENT  
 157 VTD HHPC  
 158 VTD NSES  
 159 VTD RECR  
 160 County Lee GA

S. B. 2EX

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161 County Macon GA

162 County Marion GA

163 County Miller GA

164 County Mitchell GA

165 County Muscogee GA

166 VTD CARVER/MACK

167 VTD COLUMBUS TECH

168 Block 000300:

169 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013

170 1017 1018 1019 1020 1021 1022 1023 1024 1027 1028 1029 1031

171 1032 1034 1035 1036 1037 1040 2005 2006 2007 2008 2009 2010

172 2021 2022 2023 2025 2026 2027 2028 2029 2030 2031 2032 2033

173 2034 2035 2036 2037 2038 2040 2052 2053

174 Block 000400:

175 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016

176 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 2015

177 2016 2017 2018 2019 2024 2025 2026 2027 2028 2029 3000 3001

178 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011

179 Block 001600:

180 1000 1001 1002 1003 1004 1005 1006 1007 1008 2001 2002 2003

181 2004 2005 2006 2007 2012 2013 2014 2015

182 Block 011400:

183 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

184 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

185 1024 1025 1026 1027 2000 2001 2002 2003 2004 2005 2006 2007

186 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019

187 2020 2021 2022 2023

S. B. 2EX

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188 VTD CORNERSTONE

189 Block 010206:

190 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 2000

191 2001 2002 2003

192 Block 010209:

193 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

194 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

195 2001 2002 2003 2004 2005 2006 2007 2010 2011 2012 2013 2014

196 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026

197 2027 2028 2029 2030 2031 2032 2033 2034

198 Block 010304:

199 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1013 1014

200 1015 1016 1017 1018 1019 1020 1021 1022 1028 1029 1030 1031

201 1036

202 VTD CUSSETA RD

203 VTD EDGEWOOD BAPTIST

204 VTD FAITH TABERNACLE

205 VTD FIRST AFRICAN

206 VTD FORT BENNING 1

207 VTD FORT BENNING 2

208 VTD FORT BENNING 3

209 VTD FORT BENNING 4

210 VTD FORT BENNING 5

211 VTD FORT/WADDELL

212 VTD GENTIAN/REESE @LDS

213 VTD MARIANNA GALLOPS

214 VTD MOON/MORNINGSIDE

S. B. 2EX

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215 VTD MT PILGRIM  
 216 VTD OUR LADY OF LOURDES  
 217 VTD PSALMOND/MATHEWS  
 218 VTD ROTHSCHILD  
 219 VTD SALVATION ARMY  
 220 VTD ST ANDREWS/MIDLAND  
 221 VTD ST JOHN/BELVEDERE  
 222 VTD ST PAUL/CLUBVIEW  
 223 Block 000900:  
 224 2007 2011 2012 2013 2014 2015  
 225 Block 001000:  
 226 1009 1010 1011 1016 1017 1018 1019 1020 1021 1022 1023 1024  
 227 1025 1026 1027 1028 1029 1030 1031 1032 3000 3001 3002 3003  
 228 3004 3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015  
 229 3016 3017  
 230 Block 001100:  
 231 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 232 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1025 1030  
 233 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
 234 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023  
 235 2024 2025 2026 2027 2028 2029 2030 2031  
 236 Block 001200:  
 237 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1037  
 238 1038 1039 1040 1041  
 239 Block 001800:  
 240 1005 1018 1019 1022

S. B. 2EX

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LEGIS00002406

241 Block 011200:  
242 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
243 1012 1013 1014  
244 VTD WYNNNTON/BRITT  
245 County Peach GA  
246 County Quitman GA  
247 County Randolph GA  
248 County Schley GA  
249 County Seminole GA  
250 County Stewart GA  
251 County Sumter GA  
252 County Talbot GA  
253 County Taylor GA  
254 County Terrell GA  
255 County Thomas GA  
256 County Webster GA  
  
257 District 003  
258 County Carroll GA  
259 County Coweta GA  
260 County Douglas GA  
261 VTD BRIGHT STAR  
262 VTD DAY STAR GYM  
263 VTD DORSETT SHOALS  
264 VTD EPHESUS BAPTIST CHUR  
265 VTD MIRROR LAKE ELEMENTA

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266 VTD PRAYS MILL GYM

267 Block 080506:

268 1006 1007 2006 2014 3000 3001 3002 3003 3004 3005 3006 3007

269 3008 3009 3010 3014 3016 3017

270 Block 080507:

271 1000 1001 1002 1003 1004 1005 1006 1007 2000 2001 2002 2003

272 2004 2005 2006 2007 2008 2009 2010 3000 3001 3002 3003 3004

273 3005

274 Block 080514:

275 2002 2003 2004 2005 2010

276 VTD ST JULIANS EPISCOPAL

277 Block 080508:

278 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011 3012 3013

279 3014 3015

280 Block 080512:

281 1000 1003 1011 1012 1013 1014 1015 1016 1017

282 VTD WINSTON

283 County Fayette GA

284 VTD ABERDEEN

285 VTD ANTIOCH

286 VTD BLACKROCK

287 VTD BRAELINN

288 VTD BROOKS

289 VTD CAMP CREEK

290 VTD DOGWOOD

291 VTD FAYETTEVILLE EAST

292 VTD FAYETTEVILLE WEST

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293 VTD FIELDING RIDGE  
294 VTD FLAT CREEK  
295 VTD FLINT  
296 VTD HARPS CROSSING  
297 VTD JEFF DAVIS  
298 VTD KEDRON  
299 VTD MCINTOSH  
300 VTD MURPHY  
301 VTD OAK GROVE  
302 VTD RAREOVER  
303 VTD RISING STAR  
304 VTD SANDY CREEK  
305 VTD SHAKERAG EAST  
306 VTD SHAKERAG WEST  
307 VTD SPRING HILL  
308 VTD STARRSMILL  
309 VTD WHITEWATER  
310 VTD WILLOW POND  
311 VTD WILLOWBEND  
312 VTD WINDGATE  
313 VTD WOOLSEY  
314 County Haralson GA  
315 County Harris GA  
316 County Heard GA  
317 County Henry GA  
318 VTD NORTH HAMPTON  
319 VTD OAKLAND



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320 VTD SOUTH HAMPTON

321 County Lamar GA

322 County Meriwether GA

323 County Muscogee GA

324 VTD BRITT DAVID

325 VTD COLUMBUS TECH

326 Block 000200:

327 1000 1001 1002 1003 1004 1005 1006 1007 1008

328 Block 000300:

329 2002 2003 2004 2011 2012 2013 2018 2019 2020 2024 2039 2041

330 2042 2043 2044 2045 2046

331 Block 000400:

332 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

333 2012 2020 2021 2022 2023

334 Block 010303:

335 2025 2026

336 VTD CORNERSTONE

337 Block 010304:

338 1010 1011 1012 1023 1024 1025 1026 1027 1032 1033 1034 1035

339 1037 1038 1039 1040 1041 1042 1043 1044

340 VTD EPWORTH UMC

341 VTD ST MARK/HEIFERHORN

342 VTD ST PAUL/CLUBVIEW

343 Block 001200:

344 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

345 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

346 1035 1036

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LEGIS00002410

347 VTD ST. PETER  
348 VTD WYNNBROOK  
349 County Pike GA  
350 County Spalding GA  
351 County Troup GA  
352 County Upson GA

353 District 004  
354 County DeKalb GA  
355 VTD Allgood Elem  
356 VTD Ashford Dunwoody Road (BHAVN)  
357 VTD Ashford Park Elem (BHAVN)  
358 VTD Ashford Parkside (BHAVN)  
359 VTD Austin (DUN)  
360 VTD Austin Drive  
361 VTD Avondale (AVO)  
362 Block 023112:  
363 4005  
364 Block 023113:  
365 1017 1020 1021 2006 2007 2009 2010 2011 2012 3006  
366 VTD Bethune Middle  
367 VTD Briar Vista Elem (UNI & ATL)  
368 VTD Briarcliff  
369 VTD Briarlake Elem  
370 VTD Briarwood (BHAVN)  
371 VTD Brockett (TUC)

S. B. 2EX

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372 VTD Brockett Elem (TUC)  
373 VTD Brookhaven (BHAVN)  
374 VTD Browns Mill Elem  
375 VTD Canby Lane Elem  
376 VTD Candler - Murphey Candler Elem  
377 VTD Chamblee (CHA)  
378 VTD Chamblee 2 (CHA)  
379 VTD Chapel Hill Elem  
380 VTD Chesnut Elem (DUN)  
381 VTD Clairmont Road  
382 VTD Clarkston  
383 VTD Columbia Drive  
384 VTD Coralwood  
385 VTD Covington  
386 VTD Covington Hwy  
387 VTD Cross Keys High (BHAVN)  
388 VTD Crossroads  
389 VTD Doraville North (DOR)  
390 VTD Doraville South (DOR)  
391 VTD Dresden Elem (CHA)  
392 VTD Dunaire Elem  
393 VTD Dunwoody (DUN)  
394 VTD Dunwoody 2 (DUN)  
395 VTD Dunwoody Library (DUN)  
396 VTD Embry Hills  
397 VTD Evansdale Elem  
398 VTD Fairington Elem

399 VTD Flakes Mill Fire Station  
400 VTD Flat Rock Elem  
401 VTD Flat Shoals Parkway  
402 VTD Freedom Middle  
403 VTD Georgetown (DUN)  
404 VTD Glenhaven  
405 VTD Glenwood Road  
406 VTD Hambrick Elem  
407 VTD Harris - Margaret Harris Ed  
408 VTD Harris - Narvie J. Harris Elem  
409 VTD Hawthorne Elem  
410 VTD Henderson Mill  
411 VTD Hugh Howell (TUC)  
412 VTD Huntley Hills Elem (CHA)  
413 VTD Idlewood Elem (TUC)  
414 VTD Indian Creek  
415 VTD Jolly Elem  
416 VTD Kelley Chapel Road  
417 VTD King - ML King Jr High  
418 VTD Kingsley Elem (DUN)  
419 VTD Kittredge Elem (BHAVN)  
420 VTD Lakeside High  
421 VTD Lavista  
422 VTD Lavista Road  
423 VTD Lithonia (LIT)  
424 VTD Lithonia High  
425 VTD Livsey Elem

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426 VTD Marbut Elem  
 427 VTD Mathis - Bob Mathis Elem  
 428 VTD McLendon  
 429 VTD McWilliams  
 430 VTD Medlock  
 431 VTD Memorial South  
 432 VTD Midvale Elem (TUC)  
 433 VTD Midvale Road  
 434 VTD Midway Elem  
 435 VTD Miller - Eldridge L. Miller Elem  
 436 VTD Miller Grove  
 437 VTD Miller Grove High  
 438 VTD Miller Grove Road  
 439 VTD Montclair Elem (BHAVN)  
 440 VTD Montgomery Elem (BHAVN)  
 441 VTD Montreal (TUC)  
 442 VTD Mount Vernon East (DUN)  
 443 VTD Mt.Vernon West (DUN)  
 444 VTD North Decatur  
 445 Block 022203:  
 446 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1015  
 447 2000 2002  
 448 Block 022206:  
 449 2016 2018 2019 3000 3001  
 450 VTD North Hairston  
 451 VTD North Peachtree (DUN)  
 452 VTD Northlake

453 VTD Oak Grove Elem  
454 VTD Oakcliff Elem  
455 VTD Panola  
456 VTD Panola Road  
457 VTD Panola Way Elem  
458 VTD Peachcrest  
459 VTD Peachtree Middle (DUN)  
460 VTD Pine Lake (PIN)  
461 VTD Pleasantdale Road  
462 VTD Princeton Elem  
463 VTD Rainbow Elem  
464 VTD Redan Elem  
465 VTD Redan Middle  
466 VTD Redan Road  
467 VTD Redan-Trotti Library  
468 VTD Rehoboth  
469 VTD Rock Chapel Elem  
470 VTD Rock Chapel Road  
471 VTD Rockbridge Elem  
472 VTD Rockbridge Road  
473 VTD Rowland Elem  
474 VTD Rowland Road  
475 VTD Sagamore Hills Elem  
476 VTD Salem Middle  
477 VTD Scott  
478 Block 022303:  
479 1022 1023 1024 1025 1026 3006 3007 3008 3009 3010 3015

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480 Block 022304:  
481 1003 1006 1007 1008 1009 1010 1011 1012 1013 2000 2001 2002  
482 2003 2004 2005 2006 2007 2008 2009 2010  
483 VTD Shadow Rock Elem  
484 VTD Shamrock  
485 VTD Shaw Elementary  
486 VTD Silver Lake (ATL & BHAVN)  
487 VTD Skyland (BHAVN)  
488 VTD Smoke Risc (TUC)  
489 VTD Snapfinger Elem  
490 VTD Snapfinger Road North  
491 VTD Snapfinger Road South  
492 VTD South Deshon  
493 VTD South Hairston  
494 VTD Stephenson High  
495 VTD Stephenson Middle  
496 VTD Stone Mill Elem  
497 VTD Stone Mountain (STO)  
498 VTD Stone Mountain Champion (STO)  
499 VTD Stone Mountain Elem  
500 VTD Stone Mountain Middle (TUC)  
501 VTD Stonecrest Library  
502 VTD Stoneview Elem  
503 VTD Tilly Mill Road (DUN)  
504 VTD Tucker (TUC)  
505 VTD Tucker Library (TUC)  
506 VTD Valley Brook

507 VTD Warren Tech  
 508 VTD Wesley Chapel Library  
 509 VTD White Oak  
 510 VTD Winters Chapel (DUN)  
 511 VTD Woodridge Elem  
 512 VTD Woodrow Road  
 513 VTD Woodward Elem (BHAVN)  
 514 VTD Wynbrooke Elem  
 515 VTD Young Road  
 516 County Newton GA  
 517 VTD ALCOVY  
 518 Block 100204:  
 519 1006  
 520 Block 100301:  
 521 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 522 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024  
 523 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036  
 524 1037 1038 1039 1040 1041 1042 1043 2015 2033 2034 2037 2038  
 525 2039 2040 2041 2042 2043 2045 2053 2056 2057 2058 2059 2060  
 526 2061 2062 2065 2070 2071 2072 2073 2074 2075 2076 2077 2078  
 527 2081 3000 3001 3002 3003 3004 3005 3006 3007 3008 3009 3010  
 528 3011 3012 3013  
 529 Block 100302:  
 530 1000 1030 1031 3000 3001 3002 3003 3005 3006 3007 3008 3009  
 531 3010 3011 3012 3013 3014 3015 3018 3019 3020 3021 3022 3023  
 532 3024 3025 3026 3027 3028 3029 3030 3031 3032 3033 3034 3035  
 533 3036 3037 3038 3039 3040 3044 3045 3059

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LC 47 1166S (SCS)

534 Block 100400:  
 535 1079 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2013  
 536 2014 2015 2016 2017 2018 2019 2024 2025 2026 2027 2028 2072  
 537 2073 2074 2075  
 538 VTD ALMON  
 539 VTD BEAVERDAM  
 540 VTD BUCK CREEK  
 541 VTD CEDAR SHOALS  
 542 VTD CITY POND  
 543 Block 100101:  
 544 3009 3010 3011 3012 3013 3014 3018 3019 3020 3021 3022 3023  
 545 3024 3025 3026 3027 3028 3029 3030 3031 3032 3033 3034 3035  
 546 3036 3037 3038 3039 3040 3041  
 547 Block 100301:  
 548 1012 2003 2004 2005 2006 2016 2017 2018 2019 2020 2021 2022  
 549 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2035 2036  
 550 2044 2046 2047 2048 2049 2050 2051 2052 2054 2055 2068 2069  
 551 2079 2080 2082 2083 2084 2085 2086 2087 2089 2090  
 552 Block 100302:  
 553 3004  
 554 Block 100400:  
 555 1000 1001 1002 1003 1004 1005 1061 1065 1066 1067 1068 1069  
 556 1070 1080  
 557 VTD COVINGTON MILLS  
 558 VTD CROWELL  
 559 VTD DOWNS

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560 Block 100905:  
 561 1000  
 562 VTD FAIRVIEW  
 563 VTD LIVINGSTON  
 564 Block 100600:  
 565 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 566 1012 2005 2006 2007 2008 2009 2010 2011 2012 2014 2015 2016  
 567 2017 2018 2019 2020 2032 2036 2037 2038 2041 2042 2043 2044  
 568 2045 2046 2047 2048 2049 2050 2051 2052 2054 2055  
 569 Block 100904:  
 570 1002 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010  
 571 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021  
 572 VTD OXFORD  
 573 Block 100102:  
 574 1036 1037 1045 1046 1048 1049 1050 1051 1052 1053 1054 1055  
 575 1056 1057 1058 1059 1060 1061 1062  
 576 Block 100400:  
 577 1006 1007 1008 1009 1010 1011 1012 1013 1014 1034 1035 1036  
 578 1037 1038 1039 1040 1041 1044 1045 1046 1047 1048 1049 1050  
 579 1051 1052 1053 1054 1060 1062 1063 1064  
 580 VTD STANSELLS  
 581 VTD TOWN  
 582 County Rockdale GA

583 District 005

584 County Clayton GA

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LC 47 1166S (SCS)

585 VTD FOREST PARK 1  
 586 VTD FOREST PARK 2  
 587 VTD FOREST PARK 3  
 588 VTD OAK 1  
 589 VTD OAK 2  
 590 VTD OAK 3  
 591 VTD OAK 4  
 592 County DeKalb GA  
 593 VTD Avondale (AVO)  
 594 Block 022100:  
 595 2042 2043 2045  
 596 Block 022203:  
 597 2023 2024  
 598 Block 022900:  
 599 1000 1001 1002 1003 1004  
 600 Block 023000:  
 601 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 602 1012 1013 1014 1015 1016 1017 1018 1019 1023 1024 1025 1026  
 603 1027 1028 1029 1031 1032 1033 2000 2001 2002 2003 2004 2005  
 604 2006 2007 2008 2009  
 605 Block 023102:  
 606 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 607 1012 1013 1014 1019  
 608 Block 023113:  
 609 1023 1024 1025  
 610 VTD Avondale High  
 611 VTD Bouldercrest Road

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612 VTD Boulevard (ATL)  
613 VTD Burgess Elem (ATL)  
614 VTD Candler  
615 VTD Cedar Grove Elem  
616 VTD Cedar Grove Middle  
617 VTD Cedar Grove South  
618 VTD Clairemont East (DEC)  
619 VTD Clairemont West (DEC)  
620 VTD Clifton  
621 VTD Coan Recreation Center (ATL)  
622 VTD Columbia Elem  
623 VTD Columbia Middle  
624 VTD Druid Hills  
625 VTD East Lake (ATL)  
626 VTD Emory Road  
627 VTD Emory South (UNI & ATL)  
628 VTD Epworth (ATL)  
629 VTD Fernbank  
630 VTD Flat Shoals  
631 VTD Flat Shoals Elem  
632 VTD Flat Shoals Library  
633 VTD Glennwood (DEC)  
634 VTD Gresham Road  
635 VTD Johnson Estates (ATL)  
636 VTD Kelley Lake Elem  
637 VTD Knollwood Elem  
638 VTD Lin - Mary Lin Elem (ATL)

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639 VTD McNair  
640 VTD McNair Academy  
641 VTD McNair High  
642 VTD Meadowview  
643 VTD Metropolitan (ATL)  
644 VTD North Decatur  
645 Block 022203:  
646 1011 2001 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012  
647 2013 2014 2015 2016 2017 2018 2019 2022 2026 2027 2028  
648 Block 022602:  
649 1014 1015 1016  
650 VTD Oak View Elem  
651 VTD Oakhurst (DEC)  
652 VTD Piney Grove  
653 VTD Ponce de Leon (DEC)  
654 VTD Renfroe Middle (DEC)  
655 VTD Scott  
656 Block 022303:  
657 2000 2001 2002 2003 2005 2006 2008 2010 3011 3012 3013 3014  
658 3016 3017 3019 3020 3021 3022  
659 Block 022304:  
660 2011 2012 2013 2014 2015  
661 Block 022502:  
662 2002 2003  
663 VTD Terry Mill  
664 VTD Toney Elem  
665 VTD Wadsworth

666 VTD Winnona Park (DEC)  
667 County Fulton GA  
668 VTD 01A  
669 VTD 01B  
670 VTD 01C  
671 VTD 01D  
672 VTD 01E  
673 VTD 01F  
674 VTD 01G  
675 VTD 01H  
676 VTD 01I  
677 VTD 01J  
678 VTD 01P  
679 VTD 01R  
680 VTD 01S  
681 VTD 01T  
682 VTD 02A  
683 VTD 02B  
684 VTD 02C  
685 VTD 02D  
686 VTD 02E  
687 VTD 02F1  
688 VTD 02F2  
689 VTD 02G  
690 VTD 02J  
691 VTD 02K  
692 VTD 02L1

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LC 47 1166S (SCS)

693 VTD 02L2  
694 VTD 02S  
695 VTD 02W  
696 VTD 03A  
697 VTD 03B  
698 VTD 03C  
699 VTD 03D  
700 VTD 03E  
701 VTD 03F  
702 VTD 03G  
703 VTD 03H  
704 VTD 03I  
705 VTD 03L  
706 VTD 03M  
707 VTD 03N  
708 VTD 03P1A  
709 VTD 03P1B  
710 VTD 03P2  
711 VTD 03S  
712 VTD 03T  
713 VTD 04A  
714 VTD 04B  
715 VTD 04C  
716 VTD 04D  
717 VTD 04F  
718 VTD 04G  
719 VTD 04I

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720 VTD 04J  
721 VTD 04K  
722 VTD 04L  
723 VTD 04M  
724 VTD 04S  
725 VTD 04T  
726 VTD 04V  
727 VTD 04W  
728 VTD 04X1  
729 VTD 04X2  
730 VTD 05A1  
731 VTD 05A2  
732 VTD 05B  
733 VTD 05C  
734 VTD 05D  
735 VTD 05F  
736 VTD 05J  
737 VTD 05K  
738 VTD 06B  
739 VTD 06D  
740 VTD 06E  
741 VTD 06F  
742 VTD 06G  
743 VTD 06I  
744 VTD 06J  
745 VTD 06L1  
746 VTD 06L2

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747 VTD 06N  
748 VTD 06Q  
749 VTD 06R  
750 VTD 07A  
751 VTD 07B  
752 VTD 07C  
753 VTD 07D  
754 VTD 07E  
755 VTD 07F  
756 VTD 07H  
757 VTD 07J  
758 VTD 07M  
759 VTD 07N  
760 VTD 08A  
761 VTD 08B  
762 VTD 08C  
763 VTD 08D  
764 VTD 08E  
765 VTD 08F1  
766 VTD 08F2  
767 VTD 08G  
768 VTD 08H  
769 VTD 08J  
770 VTD 08K  
771 VTD 08L  
772 VTD 08M  
773 VTD 08N1

774 VTD 08N2  
775 VTD 08P  
776 VTD 09A  
777 VTD 09B  
778 VTD 09C  
779 VTD 09D  
780 VTD 09E  
781 VTD 09F  
782 VTD 09G  
783 VTD 09H  
784 VTD 09I  
785 VTD 09K  
786 VTD 09M  
787 VTD 10A  
788 VTD 10B  
789 VTD 10C  
790 VTD 10D  
791 VTD 10E  
792 VTD 10F  
793 VTD 10G  
794 VTD 10H1  
795 VTD 10H2  
796 VTD 10I  
797 VTD 10J  
798 VTD 10K  
799 VTD 10M  
800 VTD 10P

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LC 47 1166S (SCS)

801 VTD 10R  
802 VTD 11B  
803 VTD 11C  
804 Block 007703:  
805 3000 3001 3017  
806 Block 007707:  
807 2001 2002 2003 2004  
808 Block 007805:  
809 1035  
810 Block 007809:  
811 2000 2001 2002 2007  
812 Block 007810:  
813 1003 2000 3003 3005 3007 3008 3009 3010  
814 Block 007900:  
815 3009 3010 3011 3019  
816 VTD 11E1  
817 VTD 11E2  
818 VTD 11E3  
819 VTD 11G  
820 VTD 11H  
821 VTD 11J  
822 VTD 11K  
823 VTD 11M  
824 VTD 11N  
825 VTD 11P  
826 VTD 11R  
827 VTD 12A

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828 VTD 12D  
829 VTD 12E1  
830 VTD 12E2  
831 VTD 12F  
832 VTD 12G  
833 VTD 12H1  
834 VTD 12H2  
835 VTD 12I  
836 VTD 12J  
837 VTD 12K  
838 VTD 12L  
839 VTD 12M  
840 VTD 12N  
841 VTD 12S  
842 VTD CP011  
843 VTD CP012  
844 VTD CP01B  
845 VTD CP02  
846 VTD CP04A  
847 VTD CP04B  
848 VTD CP051  
849 Block 010603:  
850 1004  
851 VTD CP07A  
852 VTD CP07B  
853 VTD CP07C  
854 VTD CP07D

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LC 47 1166S (SCS)

855 VTD CP07E  
856 VTD CP07F  
857 VTD EP01A  
858 VTD EP01B  
859 VTD EP02A  
860 VTD EP02B  
861 VTD EP02C  
862 VTD EP02D  
863 VTD EP02E  
864 VTD EP03A  
865 VTD EP03B  
866 VTD EP04A  
867 VTD HP01  
868 VTD SC02  
869 Block 007809:  
870 2003 2004 2005 2006  
871 VTD SC14A  
872 VTD SC14B  
873 VTD SC30A  
874 VTD SC30B  
875 VTD SS03  
876 Block 010221:  
877 1005 2000 3000 3001 3002 3003 3004 3005 3006  
878 VTD SS04  
879 Block 010127:  
880 3005 3006 3007  
881 VTD SS05

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882 VTD SS06  
883 VTD SS07A  
884 VTD SS07B  
885 VTD SS07C  
886 VTD SS08A  
887 VTD SS08B  
888 VTD SS08C  
889 Block 010121:  
890 3001  
891 VTD SS08D  
892 VTD SS09A  
893 VTD SS09B  
894 VTD SS11A  
895 VTD SS11B  
896 VTD SS11C  
897 VTD SS11D  
898 VTD SS12  
899 VTD SS13A  
900 VTD SS13B  
901 VTD SS14  
902 VTD SS16  
903 VTD SS18A  
904 Block 010204:  
905 1000 1001 1002 1006  
906 VTD SS31

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LC 47 1166S (SCS)

907 District 006  
 908 County Cherokee GA  
 909 VTD AVERY  
 910 VTD BALL GROUND  
 911 VTD CONNS CREEK  
 912 VTD FREEHOME  
 913 VTD HICKORY FLAT  
 914 Block 090805:  
 915 1000 1008  
 916 Block 090808:  
 917 3000 3002 3003 3004 3005 3008 3011 3018 3019  
 918 Block 090809:  
 919 2003  
 920 Block 090810:  
 921 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014  
 922 VTD HIGHTOWER  
 923 VTD MACEDONIA  
 924 VTD MOUNTAIN ROAD  
 925 VTD UNION HILL  
 926 County Cobb GA  
 927 VTD Addison 01  
 928 VTD Bells Ferry 02  
 929 VTD Bells Ferry 03  
 930 VTD Blackwell 01  
 931 VTD Chestnut Ridge 01  
 932 VTD Davis 01  
 933 VTD Dickerson 01

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934 VTD Dodgen 01  
 935 VTD East Piedmont 01  
 936 Block 030506:  
 937 1016 1017 1018 1019 1023 2000 2001 2002 2003 2004 2005 2006  
 938 3000 3001 3002 3003 3004 3005 3011 3012 3013 3023  
 939 Block 030604:  
 940 1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
 941 2005 2014 3000 3002 3003 3006  
 942 VTD Eastside 01  
 943 VTD Eastside 02  
 944 Block 030407:  
 945 1002 1003 1004  
 946 Block 030410:  
 947 4000 4001  
 948 VTD Elizabeth 01  
 949 Block 030506:  
 950 2008 2011 3009 3010  
 951 VTD Elizabeth 02  
 952 VTD Elizabeth 03  
 953 VTD Elizabeth 04  
 954 VTD Elizabeth 05  
 955 VTD Fullers Park 01  
 956 VTD Garrison Mill 01  
 957 VTD Gritters 01  
 958 VTD Hightower 01  
 959 VTD Kell 01  
 960 VTD Lassiter 01

961 VTD Mabry 01  
962 VTD Marietta 5A  
963 Block 030505:  
964 1013 1014 1015 1016 1017 3005 4008  
965 VTD Marietta 5B  
966 Block 030506:  
967 2007 2009 2010 2012 2013 3006 3007 3008 3024 3027 3028 3029  
968 3030 3031 3036  
969 Block 030508:  
970 1021 1032 1035 1048  
971 Block 030603:  
972 2007  
973 Block 030604:  
974 3001 3004 3005 3007 3008 3009 3010 3011  
975 VTD Marietta 6A  
976 Block 030505:  
977 1008 1009 1010 1011 1012  
978 Block 030508:  
979 1025  
980 Block 030511:  
981 1000 1001 1002 1003 2007 2013 2018 2019 2020 2021 2022 2023  
982 2024 2025 2026  
983 VTD Marietta 6B  
984 VTD McCleskey 01  
985 VTD Mount Bethel 01  
986 VTD Murdock 01  
987 VTD Nicholson 01



988 VTD Palmer 01  
 989 Block 030348:  
 990 2000 2001 2002 2003 3000 3001 3002 3006 3007 3008 3009 3010  
 991 3011  
 992 VTD Pope 01  
 993 VTD Post Oak 01  
 994 VTD Rocky Mount 01  
 995 VTD Roswell 01  
 996 VTD Roswell 02  
 997 VTD Sandy Plains 01  
 998 VTD Sewell Mill 01  
 999 VTD Sewell Mill 03  
 1000 Block 030409:  
 1001 1007 1008 1009 1010 1011 1012 1013 1014 1015 1020 1021 1022  
 1002 1023  
 1003 Block 030410:  
 1004 1000 1001 1002 1003 1006 2000 2001 2002 2003 2004 2005 2006  
 1005 2007 2008 2009  
 1006 Block 030505:  
 1007 1000 1001 1002 1003 1004 1005 2000 2001 2002 2003 2004 2005  
 1008 2006 2012  
 1009 Block 030510:  
 1010 1009  
 1011 VTD Shallowford Falls 01  
 1012 VTD Simpson 01  
 1013 VTD Sope Creek 01  
 1014 VTD Timber Ridge 01

1015 VTD Willeo 01  
1016 County Dawson GA  
1017 County Forsyth GA  
1018 County Fulton GA  
1019 VTD AP01A  
1020 VTD AP01B  
1021 VTD AP01C  
1022 VTD AP01D  
1023 VTD AP01E  
1024 VTD AP021  
1025 VTD AP022  
1026 VTD AP02B  
1027 VTD AP03  
1028 VTD AP04A  
1029 VTD AP04B  
1030 VTD AP05  
1031 VTD AP06  
1032 VTD AP07A  
1033 VTD AP07B  
1034 VTD AP09A  
1035 VTD AP09B  
1036 VTD AP10  
1037 VTD AP12A  
1038 VTD AP12B  
1039 VTD AP12C  
1040 VTD AP12D  
1041 VTD ML011

1042	VTD ML012
1043	VTD ML01B
1044	VTD ML021
1045	VTD ML022
1046	VTD ML023
1047	VTD ML024
1048	VTD ML03
1049	VTD ML04A
1050	VTD ML04B
1051	VTD ML04C
1052	VTD ML05A
1053	VTD ML05B
1054	VTD ML05C
1055	VTD ML06A
1056	VTD ML06B
1057	VTD ML071
1058	VTD ML072
1059	VTD ML07A
1060	VTD MP01
1061	VTD RW01
1062	VTD RW02
1063	VTD RW03
1064	VTD RW04
1065	VTD RW05
1066	VTD RW06
1067	VTD RW07A
1068	VTD RW07B

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LC 47 1166S (SCS)

1069 VTD RW08  
 1070 VTD RW09  
 1071 VTD RW10  
 1072 VTD RW11A  
 1073 VTD RW11B  
 1074 VTD RW12  
 1075 VTD RW13  
 1076 VTD RW16  
 1077 VTD RW17  
 1078 VTD RW19  
 1079 VTD RW20  
 1080 VTD RW21  
 1081 Block 011440:  
 1082 1009 1010 1011 1012  
 1083 VTD RW22A  
 1084 Block 011424:  
 1085 1004 2001 2002 2003  
 1086 Block 011432:  
 1087 1000 1001 1002 1003 1004 1005 2000 2001 2002 2003 2004 2005  
 1088 3000 3001 3002 3003 3004  
 1089 Block 011433:  
 1090 2003 2004 2005 3001  
 1091 Block 011441:  
 1092 2007  
 1093 Block 011442:  
 1094 1000 1001 1002 1003 2000 2001 2002 2003 2004 2005 2006 2007  
 1095 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017

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1096 VTD SS01  
 1097 Block 010107:  
 1098 1000 1003 1004 1005 1006 1010 2000 2001 2002 2003  
 1099 Block 010108:  
 1100 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 2001  
 1101 2002 2003 2004 2005 2006  
 1102 VTD SS02A  
 1103 VTD SS02B  
 1104 VTD SS03  
 1105 Block 010221:  
 1106 1000 1001 1002 1003 1004 1006  
 1107 VTD SS04  
 1108 Block 010126:  
 1109 1000 1001 1002 1003 1004 2000 2001 2002 2003 3000 3001  
 1110 Block 010127:  
 1111 1000 1001 1002 1003 1004 1005 1006 1007 1008 2000 2001 2002  
 1112 2003 3000 3001 3002 3003 3004 4000 4001 4002  
 1113 VTD SS08C  
 1114 Block 010121:  
 1115 2000 3000  
 1116 VTD SS15A  
 1117 VTD SS15B  
 1118 VTD SS17  
 1119 VTD SS18A  
 1120 Block 010217:  
 1121 2004 2005 2006  
 1122 VTD SS18B

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1123 VTD SS19A  
1124 VTD SS19B  
1125 VTD SS20  
1126 VTD SS22  
1127 VTD SS26  
1128 VTD SS29A  
1129 VTD SS29B  
1130 County Gwinnett GA  
1131 VTD SUGAR HILL B  
1132 VTD SUGAR HILL C  
1133 VTD SUGAR HILL F  
1134 VTD SUGAR HILL G  
1135 VTD SUWANEE D

1136 District 007  
1137 County Fulton GA  
1138 VTD AP14  
1139 VTD JC01  
1140 VTD JC02  
1141 VTD JC03A  
1142 VTD JC03B  
1143 VTD JC04A  
1144 VTD JC04B  
1145 VTD JC05  
1146 VTD JC06  
1147 VTD JC07

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1148 VTD JC08  
1149 VTD JC09  
1150 VTD JC10  
1151 VTD JC11  
1152 VTD JC12  
1153 VTD JC13A  
1154 VTD JC13B  
1155 VTD JC14  
1156 VTD JC15  
1157 VTD JC16  
1158 VTD JC18  
1159 VTD JC19  
1160 VTD RW21  
1161 Block 011424:  
1162 1007 1011  
1163 Block 011439:  
1164 1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
1165 2005 2006 2007 2008 2009  
1166 Block 011444:  
1167 2014 2015  
1168 VTD RW22A  
1169 Block 011424:  
1170 1010  
1171 Block 011432:  
1172 2007  
1173 VTD RW22B  
1174 VTD SS01



1175 Block 010108:  
1176 2000 3000 3001 3002 3003 3004 3005 3006  
1177 County Gwinnett GA  
1178 VTD BAYCREEK A  
1179 VTD BAYCREEK B  
1180 VTD BAYCREEK C  
1181 VTD BAYCREEK D  
1182 VTD BAYCREEK E  
1183 VTD BAYCREEK F  
1184 VTD BAYCREEK G  
1185 VTD BAYCREEK H  
1186 VTD BAYCREEK I  
1187 VTD BAYCREEK J  
1188 VTD BAYCREEK K  
1189 VTD BERKSHIRE A  
1190 VTD BERKSHIRE B  
1191 VTD BERKSHIRE D  
1192 VTD BERKSHIRE E  
1193 VTD BERKSHIRE F  
1194 VTD BERKSHIRE G  
1195 VTD BERKSHIRE H  
1196 VTD BERKSHIRE J  
1197 VTD BERKSHIRE L  
1198 VTD BERKSHIRE M  
1199 VTD BERKSHIRE N  
1200 VTD BERKSHIRE O  
1201 VTD BERKSHIRE P

1202 VTD BERKSHIRE Q  
1203 VTD CATES A  
1204 VTD CATES B  
1205 VTD CATES C  
1206 VTD CATES D  
1207 VTD CATES E  
1208 VTD CATES F  
1209 VTD CATES G  
1210 VTD CATES H  
1211 VTD CATES I  
1212 VTD CATES J  
1213 VTD CATES K  
1214 VTD CATES L  
1215 VTD CATES M  
1216 VTD CATES N  
1217 VTD CATES O  
1218 VTD DACULA  
1219 VTD DULUTH A  
1220 VTD DULUTH B  
1221 VTD DULUTH C  
1222 VTD DULUTH D  
1223 VTD DULUTH E  
1224 VTD DULUTH F  
1225 VTD DULUTH G  
1226 VTD DULUTH H  
1227 VTD DULUTH I  
1228 VTD DULUTH K

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1229 VTD GARNERS A  
1230 VTD GARNERS B  
1231 VTD GARNERS C  
1232 VTD GARNERS D  
1233 VTD GARNERS F  
1234 VTD HARBINS A  
1235 VTD HARBINS B  
1236 VTD HARBINS C  
1237 VTD LAWRENCEVILLE A  
1238 VTD LAWRENCEVILLE B  
1239 VTD LAWRENCEVILLE D  
1240 VTD LAWRENCEVILLE E  
1241 VTD LAWRENCEVILLE F  
1242 VTD LAWRENCEVILLE G  
1243 VTD LAWRENCEVILLE J  
1244 VTD LAWRENCEVILLE L  
1245 VTD LAWRENCEVILLE M  
1246 VTD LAWRENCEVILLE N  
1247 VTD MARTINS A  
1248 VTD MARTINS B  
1249 VTD MARTINS C  
1250 VTD MARTINS D  
1251 VTD MARTINS E  
1252 VTD MARTINS F  
1253 VTD MARTINS G  
1254 VTD MARTINS H  
1255 VTD MARTINS I

1256 VTD MARTINS J  
1257 VTD MARTINS K  
1258 VTD PINCKNEYVILLE A1  
1259 VTD PINCKNEYVILLE B  
1260 VTD PINCKNEYVILLE C  
1261 VTD PINCKNEYVILLE D  
1262 VTD PINCKNEYVILLE E  
1263 VTD PINCKNEYVILLE F  
1264 VTD PINCKNEYVILLE H  
1265 VTD PINCKNEYVILLE I  
1266 VTD PINCKNEYVILLE J  
1267 VTD PINCKNEYVILLE K  
1268 VTD PINCKNEYVILLE L  
1269 VTD PINCKNEYVILLE M  
1270 VTD PINCKNEYVILLE N  
1271 VTD PINCKNEYVILLE O  
1272 VTD PINCKNEYVILLE P  
1273 VTD PINCKNEYVILLE Q  
1274 VTD PINCKNEYVILLE S  
1275 VTD PINCKNEYVILLE T  
1276 VTD PINCKNEYVILLE U  
1277 VTD PINCKNEYVILLE V  
1278 VTD PINCKNEYVILLE W  
1279 VTD PINCKNEYVILLE X  
1280 VTD PINCKNEYVILLE Y  
1281 VTD PINCKNEYVILLE Z  
1282 VTD PINKCNEYVILLE A

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1283 VTD ROCKBRIDGE A

1284 VTD ROCKBRIDGE B

1285 VTD ROCKBRIDGE C

1286 VTD ROCKBRIDGE D

1287 VTD ROCKBRIDGE E

1288 VTD ROCKBRIDGE F

1289 VTD ROCKBRIDGE G

1290 VTD SUWANEE G

1291 Block 050223:

1292 3017 3018 3023

1293 Block 050244:

1294 2000 2009

1295 District 008

1296 County Atkinson GA

1297 County Baldwin GA

1298 County Ben Hill GA

1299 County Berrien GA

1300 County Bibb GA

1301 VTD HAZZARD 2

1302 VTD HAZZARD 4

1303 VTD HOWARD 1

1304 VTD HOWARD 2

1305 Block 012101:

1306 1002 1007 1008 1009 1013 1014 1015 1016 1018 1019 1020 1021

1307 1022 1023 2004 2008 2012 2013 2014

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1308 Block 012200:  
 1309 2015 2046  
 1310 Block 013201:  
 1311 4001 4010  
 1312 Block 013412:  
 1313 1008 1014 1015 1017 1018 1019 1021 1024 1025 1026 1027 1029  
 1314 2000 2002 2003 2004 2005 2006 2007 2008 2009 2019 2020 2021  
 1315 2022 2023 2027 2028 2029  
 1316 Block 013413:  
 1317 1003 1004 1005 1006 1007 1009 1010 1011 1012 1013 1014 1017  
 1318 1019  
 1319 VTD HOWARD 3  
 1320 VTD HOWARD 4  
 1321 VTD HOWARD 5  
 1322 VTD HOWARD 6  
 1323 VTD HOWARD 7  
 1324 VTD VINEVILLE 5  
 1325 VTD VINEVILLE 6  
 1326 Block 011800:  
 1327 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
 1328 2013 2014 2015 3003 3004 3006 3007 3008 3009 3010 3011 3012  
 1329 3013 3014 3015 3016 3017 3018 3019 3020 3021 3022 3023 3024  
 1330 3025 3029  
 1331 Block 012000:  
 1332 3013 3014 3017 3019  
 1333 Block 012200:  
 1334 1000

1335 County Bleckley GA  
1336 County Brooks GA  
1337 County Clinch GA  
1338 County Coffee GA  
1339 County Colquitt GA  
1340 County Cook GA  
1341 County Crisp GA  
1342 County Dodge GA  
1343 County Echols GA  
1344 County Houston GA  
1345 VTD ANNX  
1346 VTD BMS  
1347 VTD CGTC  
1348 VTD FMMS  
1349 VTD HAFS  
1350 VTD HCTC  
1351 VTD HEFS  
1352 VTD MCMS  
1353 VTD ROZR  
1354 VTD TMS  
1355 VTD TWPK  
1356 VTD VHS  
1357 County Irwin GA  
1358 County Jeff Davis GA  
1359 County Jones GA  
1360 County Lanier GA  
1361 County Lowndes GA



1362 County Monroe GA  
1363 County Pulaski GA  
1364 County Telfair GA  
1365 County Tift GA  
1366 County Turner GA  
1367 County Twiggs GA  
1368 County Wilcox GA  
1369 County Wilkinson GA  
1370 County Worth GA

1371 District 009  
1372 County Banks GA  
1373 County Fannin GA  
1374 County Franklin GA  
1375 County Gilmer GA  
1376 County Gwinnett GA  
1377 VTD DUNCANS A  
1378 VTD DUNCANS B  
1379 VTD DUNCANS C  
1380 VTD DUNCANS D  
1381 VTD GOODWINS A  
1382 VTD GOODWINS B  
1383 VTD GOODWINS C  
1384 VTD GOODWINS D  
1385 VTD GOODWINS E  
1386 VTD GOODWINS F

1387 VTD GOODWINS G  
1388 VTD GOODWINS H  
1389 VTD GOODWINS I  
1390 VTD HOG MOUNTAIN A  
1391 VTD HOG MOUNTAIN B  
1392 VTD HOG MOUNTAIN C  
1393 VTD HOG MOUNTAIN D  
1394 VTD LAWRENCEVILLE C  
1395 VTD LAWRENCEVILLE II  
1396 VTD LAWRENCEVILLE I  
1397 VTD LAWRENCEVILLE K  
1398 VTD PUCKETTS A  
1399 VTD PUCKETTS B  
1400 VTD PUCKETTS C  
1401 VTD PUCKETTS D  
1402 VTD PUCKETTS E  
1403 VTD ROCKYCREEK A  
1404 VTD ROCKYCREEK B  
1405 VTD ROCKYCREEK C  
1406 VTD SUGAR HILL A  
1407 VTD SUGAR HILL D  
1408 VTD SUGAR HILL E  
1409 VTD SUWANEE A  
1410 VTD SUWANEE B  
1411 VTD SUWANEE C  
1412 VTD SUWANEE E  
1413 VTD SUWANEE F

1414 VTD SUWANEE G

1415 Block 050223:

1416 2008 2009 2011 2012 3001 3002 3003 3004 3005 3007 3008 3009

1417 3010 3011 3012 3013 3016 3019 3020 3021 3022

1418 Block 050244:

1419 1004 1005 1006 1007 1011 1012 1013 1014 1015 2001 2002 2003

1420 2004 2005 2006 2007 2008

1421 VTD SUWANEE H

1422 County Habersham GA

1423 County Hall GA

1424 County Hart GA

1425 County Lumpkin GA

1426 County Rabun GA

1427 County Stephens GA

1428 County Towns GA

1429 County Union GA

1430 County White GA

1431 District 010

1432 County Barrow GA

1433 County Butts GA

1434 County Clarke GA

1435 County Elbert GA

1436 County Greene GA

1437 County Hancock GA

1438 County Henry GA

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1439 VTD EAST LAKE  
 1440 VTD GROVE PARK  
 1441 VTD KELLEYTOWN  
 1442 VTD LAKE DOW  
 1443 VTD LAKE HAVEN  
 1444 VTD LOCUST GROVE  
 1445 VTD LOWES  
 1446 VTD MCDONOUGH  
 1447 VTD MCDONOUGH CENTRAL  
 1448 VTD MCMULLEN  
 1449 VTD MT. BETHEL  
 1450 VTD SANDY RIDGE  
 1451 VTD SHILOH  
 1452 VTD TIMBERRIDGE  
 1453 VTD TUSSAHAW  
 1454 VTD UNITY GROVE  
 1455 VTD WESLEY LAKES  
 1456 VTD WESTSIDE  
 1457 County Jackson GA  
 1458 County Jasper GA  
 1459 County Madison GA  
 1460 County Morgan GA  
 1461 County Newton GA  
 1462 VTD ALCOVY  
 1463 Block 100101:  
 1464 4008 4019 4020 4021 4022 4023 4024 4026 4029 4030 4031 4032  
 1465 4033 4034 4035 4049

1466 Block 100202:  
 1467 1006 1007  
 1468 Block 100301:  
 1469 2000 2008 2009 2010 2011 2012 2013 2014 2066 2067 2088  
 1470 VTD BREWERS  
 1471 VTD BRICK STORE  
 1472 VTD CITY POND  
 1473 Block 100101:  
 1474 4014 4015 4016 4017 4018 4037 4038 4039 4040 4041 4042 4043  
 1475 4044 4045 4046 4047 4048  
 1476 Block 100301:  
 1477 2001 2002 2007  
 1478 VTD DOWNS  
 1479 Block 100903:  
 1480 2011 2012 2013 2014 2015 2016  
 1481 Block 100904:  
 1482 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 2022 3000  
 1483 3001 3002 3003 3004 3005 3006 3007 4000 4001 4002 4003 4004  
 1484 4005 4006 4007 4008 4009 4010 4011 4012 4013 4014 4015 4016  
 1485 Block 100905:  
 1486 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012  
 1487 1013 1014 1015 1016 2000 2001 2002 2003 2004 2005 2006 2007  
 1488 2008 2009 2010 2011 2012 2013 2014 2015 2016 3000 3001 3002  
 1489 3003 3004 3005 3006 3007 3008 3009 3010 3011 3012 3013 3014  
 1490 VTD GUM CREEK  
 1491 VTD HUB  
 1492 VTD LEGUINN

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1493 VTD LIVINGSTON  
 1494 Block 100600:  
 1495 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 2056 2057  
 1496 2058  
 1497 Block 100904:  
 1498 1000 1001 1003 1004 1015  
 1499 VTD MANSFIELD  
 1500 VTD NEWBORN  
 1501 VTD OXFORD  
 1502 Block 100101:  
 1503 1008 1009 1010 1012 1013 1014 1015 1016 1017 1018 2014 2015  
 1504 2021 2022 2023 2024 2025 2033 2034 2035 2036 2037 2038 3000  
 1505 3001 3002 3003 3004 3005 3006 3007 3008 3015 3016 3017 4000  
 1506 4001 4002 4003 4004 4005 4006 4007 4009 4010 4011 4012 4013  
 1507 4027 4028 4036  
 1508 Block 100102:  
 1509 1001 1002 1003 1038 1039 1040 1041 1042 1043 1044 1047 1081  
 1510 VTD ROCKY PLAINS  
 1511 County Oconee GA  
 1512 County Oglethorpe GA  
 1513 County Putnam GA  
 1514 County Taliaferro GA  
 1515 County Walton GA  
 1516 County Wilkes GA  
 1517 VTD 3173B - RAYLE CITY HALL  
 1518 VTD 3174A - COURTHOUSE

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1519 Block 010101:  
 1520 1057  
 1521 Block 010102:  
 1522 1049 1050 1053 1054 1079  
 1523 Block 010301:  
 1524 1012  
 1525 VTD 3174B - TIGNALL SCHOOL  
 1526 Block 010101:  
 1527 1003 1004 1005 1006 1021 1022 1023 1024 1025 1031 1032 1033  
 1528 1034 1035 1036 1037 1038 1039 1040 1041 1042 1043 1045 1046  
 1529 1048 1049 1050 1051 1052 1055 2030 2031 2032 2033 2034 2035  
 1530 2036 2037 2038 2067  
 1531 Block 010102:  
 1532 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1533 1012 1013 1014 1015 1018 1034 1035 1036 1037 1038 1039 1042  
  
 1534 District 011  
 1535 County Bartow GA  
 1536 County Cherokee GA  
 1537 VTD AIR ACRES  
 1538 VTD ARNOLD MILL  
 1539 VTD BASCOMB  
 1540 VTD BELLS  
 1541 VTD BOOTH  
 1542 VTD BRADSHAW  
 1543 VTD BRIDGEMILL

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1544 VTD CANTON  
 1545 VTD CARMEL  
 1546 VTD CLAYTON  
 1547 VTD DEER RUN  
 1548 VTD DIXIE  
 1549 VTD HICKORY FLAT  
 1550 Block 090606:  
 1551 3013  
 1552 Block 090807:  
 1553 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1012  
 1554 1013 1014 1015 1016 1017 1018 1019 1020 1021 2000 2001 2002  
 1555 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014  
 1556 2015 2016 2017 2018 3000 3001 3002 3003 3004 3005 3006 3007  
 1557 3008 3009 3010 3011 3012 3013 3014 3015 3016 3017 3018 3019  
 1558 3020 3021 3022 3023 3024 3025 3026 3027 3028 3029 3030 3031  
 1559 3032 3033 3034 3035 3036 3037  
 1560 VTD HILLSIDE  
 1561 VTD HOLLY SPRINGS  
 1562 VTD KELLOGG  
 1563 VTD LIBERTY  
 1564 VTD LITTLE RIVER  
 1565 VTD NEESE  
 1566 VTD OAK GROVE  
 1567 VTD R M MOORE  
 1568 VTD R T JONES  
 1569 VTD ROSECREEK  
 1570 VTD SALACOA

1571 VTD SIXES  
1572 VTD SUTALLEE  
1573 VTD TEASLEY  
1574 VTD TOONIGH  
1575 VTD UNIVETER  
1576 VTD VICTORIA  
1577 VTD WALESKA  
1578 VTD WILDCAT  
1579 VTD WOODLANDS  
1580 VTD WOODSTOCK  
1581 County Cobb GA  
1582 VTD Acworth 1A  
1583 VTD Acworth 1B  
1584 VTD Acworth 1C  
1585 VTD Baker 01  
1586 VTD Big Shanty 01  
1587 VTD Big Shanty 02  
1588 VTD Chalker 01  
1589 VTD Chattahoochee 01  
1590 VTD Cheatham Hill 02  
1591 VTD Cheatham Hill 03  
1592 VTD Dobbins 01  
1593 VTD Dowell 01  
1594 VTD Durham 01  
1595 VTD East Piedmont 01  
1596 Block 030604:  
1597 2006 2007 2008 2009 2013

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1598 VTD Eastside 02  
 1599 Block 030351:  
 1600 1005 2000 2001 2002 2003 2004 2005 2006 2007 2008  
 1601 Block 030407:  
 1602 1000 1001 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014  
 1603 1015 1016 1017 1018  
 1604 Block 030410:  
 1605 3001 3002 3003 4002 4003 4004 4005 4006 4007 4008 4009 4010  
 1606 VTD Elizabeth 01  
 1607 Block 030506:  
 1608 2014 3026 3035 3037 3038 3039 3041 3043  
 1609 Block 030602:  
 1610 2000 2001 2002 3000 3001 3003 3004 3005 3006 3007 3008 3009  
 1611 3011 3014 4000 4003 4004 4007  
 1612 Block 030603:  
 1613 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1614 1012 2000 2001 2002 2003 2004 2005 2008 2010 2011 2019 2020  
 1615 2021 2022 2023 2024 2025 2026 2029 2031 2032 2033 2034 2035  
 1616 2036 2037 2038 2039 2040 2045 2047 2048 3002 3003 3004 3005  
 1617 3006 3007 3008 3009 3010 3011 3012 3013 3014  
 1618 VTD Fair Oaks 04  
 1619 VTD Ford 01  
 1620 VTD Frey 01  
 1621 VTD Harrison 01  
 1622 VTD Hayes 01  
 1623 VTD Kemp 01  
 1624 VTD Kemp 02

1625 Block 030262:  
1626 2000 2001 2002 2003 2004 2005 2006 2007  
1627 Block 030263:  
1628 2000 2003 2004 2005 2006 2008 2009  
1629 Block 030270:  
1630 1000 1001  
1631 VTD Kemp 03  
1632 VTD Kennesaw 1A  
1633 VTD Kennesaw 2A  
1634 VTD Kennesaw 3A  
1635 VTD Kennesaw 4A  
1636 VTD Kennesaw 5A  
1637 VTD Lost Mountain 02  
1638 VTD Lost Mountain 04  
1639 VTD Marietta 1A  
1640 VTD Marietta 2A  
1641 VTD Marietta 2B  
1642 VTD Marietta 3A  
1643 VTD Marietta 4A  
1644 VTD Marietta 4B  
1645 VTD Marietta 4C  
1646 VTD Marietta 5A  
1647 Block 030505:  
1648 3003 3012 3013 3014 3015 4007 4025 4028  
1649 Block 030602:  
1650 4044 4045 4046 4048 4049 4050 4051 4052 4053 4054 4055 4056  
1651 4057 4058 4059 4062 4063

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1652 Block 030700:

1653 1022 1023 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015  
 1654 2016 2017 2018 2019 2024 2025 2027 3000 3001 3002 3003 3004  
 1655 3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015 3016  
 1656 3017 3018 3019 3020 3021 3022 3023 3024 3025 3026 3027 3028  
 1657 3029 3030 3031 3032 3033 3034 3035 3036 3037 3038 3043 3044  
 1658 3045 3046 3048 3049 3050 3051 3052 3053 4005 4006 4009 4010  
 1659 4011 4012 4013 4014 4015 4016 4017 4018 4019 4020 4021 4022  
 1660 4023 4024 4025 4026 4027 4028 4029 4030 4036

1661 Block 030800:

1662 3005 3006 3007 3009 3010 3011 3012 3018 3019 3020 3034

1663 Block 030912:

1664 3000 4000 4001 4002 4003 4004 4005 4007 4008 4011 4012 4013  
 1665 4014 4015 4016 4017 4018 4019 4020 4021 4022 4023 4027 4028

1666 VTD Marietta 5B

1667 Block 030505:

1668 4000 4001 4002 4003 4004 4005 4013 4014 4032

1669 Block 030506:

1670 3025 3032 3033 3034 3048 3049 3050 3051

1671 Block 030508:

1672 1036 1044 1045 1046 1047 1052 1053 1054 1055

1673 Block 030511:

1674 1004 1005 1006 1007 1008 1009 1010 1011

1675 Block 030602:

1676 3010 3012 3013 3015 3016 3017 3018 3019 3020 3021 3022 3023  
 1677 3024 3025 3026 3027 3033 3034 4008 4009 4010 4011 4012 4013

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1678 Block 030700:  
 1679 1000 1001 1003 1004 1006 1012 1013 1014 1015 1016 1024 4000  
 1680 4001 4002  
 1681 VTD Marietta 6A  
 1682 Block 030405:  
 1683 1001 1002 1004 1007 2000 2002 2003 2004 2005 3000 3002 3008  
 1684 3009 3011 3015 4000 4035 5009 5010 5016 5019 5020  
 1685 Block 030407:  
 1686 2000  
 1687 Block 030410:  
 1688 1004 1005 1007 1008 1009 3000 3004 3005  
 1689 Block 030505:  
 1690 1006 1007 2007 2008 2009 2010 2011 3000 3001 3002  
 1691 VTD Marietta 7A  
 1692 VTD Mars Hill 01  
 1693 VTD Mars Hill 02  
 1694 VTD McClure 01  
 1695 VTD Mount Bethel 03  
 1696 VTD Mount Bethel 04  
 1697 VTD Nickajack 01  
 1698 Block 031213:  
 1699 1009 1010 2013  
 1700 Block 031214:  
 1701 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1702 1012 1013 1014 1015 1021 1022 1023 2001 2002 2003 2004 2005  
 1703 2006

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1704 Block 031215:  
 1705 1000 1001 1002 1005 2000 2002 2003 2004 2005 2006 2009 2010  
 1706 2011 2012 2016 2017 3011 3012 3013 3014 3015 3016 3017 3018  
 1707 3019 3020 3022 4002 4003 4004 4005 4006 4007 4008 4009 4010  
 1708 4011 4012  
 1709 VTD North Cobb 01  
 1710 VTD Oakdale 01  
 1711 Block 031112:  
 1712 2005 2006  
 1713 Block 031209:  
 1714 2000 2001 2003 2004 2006 2007 2008 2009 2010 2011 3001 3002  
 1715 3003 3004 3005 3007 3008 3009 3011 3012 3013 3014 3015 3016  
 1716 3017 3018 3019 3022 3023  
 1717 Block 031215:  
 1718 3010  
 1719 Block 031220:  
 1720 1001 3014 3015 3016 3017 3018 3019 3020 3021 3022 3024  
 1721 Block 031221:  
 1722 2003 2005 2008 2009 2013 3000 3001 3007 3015 3016  
 1723 VTD Oregon 03  
 1724 VTD Oregon 04  
 1725 VTD Oregon 05  
 1726 Block 030270:  
 1727 2000 2001 2002 2003 2004 2005 2006  
 1728 Block 030271:  
 1729 1006 2000 2001 2002 2003 2004 2005 2006  
 1730 VTD Palmer 01

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1731 Block 030220:  
 1732 1000 1001 1002 1003 1004 1005 1006 1007  
 1733 VTD Pine Mountain 01  
 1734 VTD Pine Mountain 02  
 1735 VTD Pitner 01  
 1736 VTD Powers Ferry 01  
 1737 VTD Sewell Mill 03  
 1738 Block 030410:  
 1739 3008  
 1740 Block 030505:  
 1741 3004 3006 3007 3008 3009 3010 3011 4009 4010 4011 4012 4026  
 1742 4027 4029  
 1743 VTD Smyrna 1A  
 1744 VTD Smyrna 2A  
 1745 VTD Smyrna 3A  
 1746 Block 031001:  
 1747 2059 2060  
 1748 Block 031101:  
 1749 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
 1750 2012 2013 2014 2015 2016 2017 3000 3001 3002 3003 3004 3005  
 1751 3006 3008 5006 5007  
 1752 Block 031110:  
 1753 1000 1001 1002 1003 1004 1013 1014 1015 1016  
 1754 Block 031111:  
 1755 1013 1014 1021 1022 1023 1024 1025 3009  
 1756 Block 031121:  
 1757 2005 2007 2008 2010 2012

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1758 Block 031122:

1759 1001 1002 1003 1004 1005 1007 1008 1009 1011 1013 1016 1017

1760 1021 1022 2001 2005 2007 2011 2012 2014 2015 2019 2020 2022

1761 2024 2029 2030 2032 2033 2035 2036 2037 2040 2043 2044 2045

1762 2046 2047 2049 2050 3000 3001 3002 3003 3004 3005 3006 3007

1763 3008 3009 3010 3011 3012 3013 3014 3015 3016 3017 3018 3019

1764 3020 3021 3022

1765 VTD Smyrna 5A

1766 Block 031001:

1767 2033 2039 3024 3027

1768 Block 031004:

1769 3000 3001 3002 3007

1770 Block 031006:

1771 2015 2016

1772 Block 031101:

1773 5000 5002 5003 5004

1774 Block 031116:

1775 4000 4001 4002 4003 4004 4005 4006 4007 4008 4009 4010

1776 Block 031122:

1777 2009 2010 2017 2018

1778 VTD Smyrna 6A

1779 VTD Smyrna 7A

1780 Block 031215:

1781 2001 2007 2008 2013 2014 2015

1782 Block 031221:

1783 2000 2001 2002 2010 2011 2012 2014 2015

1784 VTD Sope Creek 02

1785 VTD Sope Creek 03  
1786 VTD Terrell Mill 01  
1787 VTD Vaughan 01  
1788 VTD Vinings 01  
1789 VTD Vinings 02  
1790 VTD Vinings 03  
1791 VTD Vinings 04  
1792 VTD Wade Green 02  
1793 County Pickens GA

1794 District 012  
1795 County Bulloch GA  
1796 County Burke GA  
1797 County Candler GA  
1798 County Columbia GA  
1799 County Effingham GA  
1800 VTD 3A  
1801 VTD 3B  
1802 VTD 3C  
1803 VTD 3D  
1804 VTD 4A  
1805 VTD 4B  
1806 Block 030209:  
1807 1017 1018 1020 1031 2011  
1808 County Emanuel GA  
1809 County Evans GA

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1810 County Glascock GA  
 1811 County Jefferson GA  
 1812 County Jenkins GA  
 1813 County Johnson GA  
 1814 County Laurens GA  
 1815 County Lincoln GA  
 1816 County McDuffie GA  
 1817 County Montgomery GA  
 1818 County Richmond GA  
 1819 County Screven GA  
 1820 County Tattnall GA  
 1821 County Toombs GA  
 1822 County Treutlen GA  
 1823 County Warren GA  
 1824 County Washington GA  
 1825 County Wheeler GA  
 1826 County Wilkes GA  
 1827 VTD 3171 - SENIOR CITIZEN  
 1828 VTD 3172A - YOUNG FARMER'S  
 1829 VTD 3172B - METASVILLE FIRE  
 1830 VTD 3173A - EDWARD B POPE  
 1831 VTD 3174A - COURTHOUSE  
 1832 Block 010101:  
 1833 1047 1053 1054 1056  
 1834 Block 010301:  
 1835 1007 1009 1010 1011 1013 1014 1015 1016 1017 1018 1019 1020  
 1836 1021 1022 1027 1030 1031 1032 1033 1034 1035 1036 1037 1038

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LC 47 1166S (SCS)

1837 1039 1041 1043 1044 1045 1046 1047 1050 1051 1052 1053 1054  
 1838 1055  
 1839 Block 010302:  
 1840 4000 4001 4002 4003 4004 4005 4008 4009 5000 5001 5019 5020  
 1841 5021 5022 5023 5024  
 1842 VTD 3174B - TIGNALL SCHOOL  
 1843 Block 010101:  
 1844 1000 1001 1002 1007 1008 1009 1010 1011 1012 1013 1014 1015  
 1845 1016 1017 1018 1019 1020 1026 1027 1028 1029 1030 1044 2000  
 1846 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2021 2022  
 1847 2023 2028 2029 2042

1848 District 013

1849 County Clayton GA

1850 VTD ELLENWOOD

1851 VTD FOREST PARK 4

1852 VTD FOREST PARK 5

1853 VTD FOREST PARK 6

1854 VTD JONESBORO 1

1855 VTD JONESBORO 10

1856 VTD JONESBORO 11

1857 VTD JONESBORO 12

1858 VTD JONESBORO 13

1859 VTD JONESBORO 14

1860 VTD JONESBORO 15

1861 VTD JONESBORO 16

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1862 VTD JONESBORO 17  
1863 VTD JONESBORO 18  
1864 VTD JONESBORO 2  
1865 VTD JONESBORO 3  
1866 VTD JONESBORO 4  
1867 VTD JONESBORO 5  
1868 VTD JONESBORO 6  
1869 VTD JONESBORO 7  
1870 VTD JONESBORO 8  
1871 VTD JONESBORO 9  
1872 VTD LAKE CITY  
1873 VTD LOVEJOY 1  
1874 VTD LOVEJOY 2  
1875 VTD LOVEJOY 3  
1876 VTD LOVEJOY 4  
1877 VTD LOVEJOY 5  
1878 VTD MORROW 1  
1879 VTD MORROW 2  
1880 VTD MORROW 3  
1881 VTD MORROW 4  
1882 VTD MORROW 5  
1883 VTD MORROW 6  
1884 VTD MORROW 7  
1885 VTD MORROW 8  
1886 VTD MORROW 9  
1887 VTD PANHANDLE 1  
1888 VTD PANHANDLE 2

1889 VTD RIVERDALE 1  
 1890 VTD RIVERDALE 10  
 1891 VTD RIVERDALE 11  
 1892 VTD RIVERDALE 12  
 1893 VTD RIVERDALE 2  
 1894 VTD RIVERDALE 3  
 1895 VTD RIVERDALE 4  
 1896 VTD RIVERDALE 5  
 1897 VTD RIVERDALE 6  
 1898 VTD RIVERDALE 7  
 1899 VTD RIVERDALE 8  
 1900 VTD RIVERDALE 9  
 1901 County Cobb GA  
 1902 VTD Birney 01  
 1903 VTD Birney 02  
 1904 VTD Bryant 01  
 1905 VTD Bryant 02  
 1906 VTD Fair Oaks 02  
 1907 VTD Harmony-Leland 01  
 1908 VTD Lindley 01  
 1909 VTD Mableton 01  
 1910 Block 031306:  
 1911 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1912 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023  
 1913 2000 2001 2002 2003 2004 2010 2011 2012 2013 2014 2019 2020  
 1914 2021



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LC 47 1166S (SCS)

1915 Block 031414:  
 1916 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 2000  
 1917 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 3003  
 1918 3004 3005 3006 3007  
 1919 VTD Mableton 02  
 1920 Block 031306:  
 1921 1024 1025 1026 1027 2005 2006 2007 2008 2009 2015 2016 2017  
 1922 2018 2044 2045  
 1923 Block 031308:  
 1924 1000 1001 1002 1003 1004 1005 1006 1007 1008 2000 2001 2002  
 1925 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014  
 1926 2015 2016 2017  
 1927 Block 031317:  
 1928 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1013  
 1929 1014 1015  
 1930 Block 031323:  
 1931 2000 2001 2002 2003 2004 2005 2006  
 1932 VTD Mableton 03  
 1933 VTD Mableton 04  
 1934 VTD Nickajack 01  
 1935 Block 031220:  
 1936 1003  
 1937 VTD Norton Park 01  
 1938 VTD Oakdale 01  
 1939 Block 031118:  
 1940 2013 2017 3003 3004 3005 3006 3008 3009 3010 3012 3014 4006  
 1941 4007

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1942 Block 031220:  
 1943 1005 1007 3004 3007  
 1944 Block 031221:  
 1945 1004 1008 3004 3005 3017  
 1946 VTD Oregon 02  
 1947 VTD Pebblebrook 01  
 1948 VTD Riverside 01  
 1949 VTD Smyrna 3A  
 1950 Block 031101:  
 1951 3007  
 1952 Block 031110:  
 1953 1012 1017 1018 1019 1020 1021 1022 1023 1024 1025 2001 2002  
 1954 2003 2004 2005 2006 2007 2008 2012 2013 2014 2015 2016 2017  
 1955 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029  
 1956 2030 2031 2032 2033  
 1957 Block 031112:  
 1958 1015 1016  
 1959 Block 031115:  
 1960 3000 3001 3002 3004 3005 3006 3008 3009 3028 3029  
 1961 Block 031117:  
 1962 1000 1001 1002 1003 4000 4004 4005  
 1963 Block 031118:  
 1964 1000 1001 1004 1008 1010 1011 1012 1013 1014 1015 1016 1020  
 1965 2000 2001 2004 2005 2007 2016  
 1966 VTD Smyrna 4A  
 1967 VTD Smyrna 5A

1968 Block 031001:  
 1969 3029  
 1970 Block 031101:  
 1971 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1972 1012 1013 1014 1015 1016 4000 4001 4002 4003 4004 4005 4006  
 1973 4007 4008 4009 4010 4011 4012 4013 5001 5005 5008 5009  
 1974 Block 031110:  
 1975 1005 1006 1007 1008 1009 1010 1011  
 1976 Block 031115:  
 1977 2000 2001 2002 3020 3021 3022  
 1978 Block 031116:  
 1979 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1013 1014  
 1980 1015 1016 1017 1018 1019 1021 2001 2011 2013 3000 3001 3002  
 1981 3003 3007 3012 3014 3015 3016 3017 3018  
 1982 VTD Smyrna 7A  
 1983 Block 031118:  
 1984 3015 3016  
 1985 Block 031215:  
 1986 1003 1004 1006 1007 1008 1009 1011  
 1987 Block 031220:  
 1988 1000 1002 1004 3025  
 1989 Block 031221:  
 1990 1000 1001 1002 1003 1005 1006 1007 1009 1010 1011 1012 1013  
 1991 1014 1015 1016 1017 1019 1020 1021 1022 1023 2004 2006 2007  
 1992 3002 3003 3006 3008 3009 3010 3011 3012 3013 3014  
 1993 Block 031314:  
 1994 1001 1009 2003 2009 2011 2015 2021 2023 2031 2032 2033 2036

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1995 2038 3004 3006 3007  
 1996 Block 031315:  
 1997 1000 1001 1002 1003 1004 1005 1006 1007 1009 1010 3000 3002  
 1998 3008  
 1999 Block 031324:  
 2000 1001 1002 1010 1011  
 2001 Block 031325:  
 2002 2000 2010 2012 2013 2014 2015 2017 2018  
 2003 VTD Sweetwater 02  
 2004 County Douglas GA  
 2005 VTD ARBOR STATION  
 2006 VTD BEULAH BAPTIST CHURCH  
 2007 VTD BOUNDARY WATERS  
 2008 VTD CHAPEL HILL  
 2009 VTD CHESTNUT LOG  
 2010 VTD CHURCH AT CHAPEL HILL  
 2011 VTD COLONIAL HILLS  
 2012 VTD COUNTY LINE BAPTIST  
 2013 VTD DEER LICK  
 2014 VTD FACTORY SHOALS  
 2015 VTD FIRST BAPTIST DOUGLASVILLE  
 2016 VTD FIRST BAPTIST LITHIA SPRINGS  
 2017 VTD GOLDEN METHODIST CH  
 2018 VTD LUTHERAN CHURCH - GS  
 2019 VTD OLD COURTHOUSE  
 2020 VTD PRAYS MILL GYM

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LC 47 1166S (SCS)

2021 Block 080514:  
2022 2006 2007  
2023 VTD ST JULIANS EPISCOPAL  
2024 Block 080509:  
2025 3000 3001 3002 3003 3004 3005  
2026 Block 080512:  
2027 1018  
2028 VTD STEWART  
2029 VTD TURNER  
2030 County Fayette GA  
2031 VTD BANKS  
2032 VTD EUROPE  
2033 VTD HOPEFUL  
2034 VTD KENWOOD  
2035 VTD MORNING CREEK  
2036 VTD OAK RIDGE  
2037 County Fulton GA  
2038 VTD 11C  
2039 Block 010312:  
2040 1000 1001 1002 1003 1004  
2041 VTD CH01  
2042 VTD CH02  
2043 VTD CH03  
2044 VTD CH04A  
2045 VTD CH04B  
2046 VTD CH05  
2047 VTD CP051

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2048 Block 010603:  
2049 1005 1006 1007 1008 1011 1012 1013  
2050 Block 010604:  
2051 3000 3001 3002 3003 3004 3005 3006 3011 3014 3015 3016 3017  
2052 3019  
2053 VTD CP052  
2054 VTD CP053  
2055 VTD CP05B  
2056 VTD CP06A  
2057 VTD CP06B  
2058 VTD CP081  
2059 VTD CP083  
2060 VTD CP084  
2061 VTD CP08A  
2062 VTD EP04B  
2063 VTD FA01A  
2064 VTD FA01B  
2065 VTD FA01C  
2066 VTD PA01  
2067 VTD SC01A  
2068 VTD SC01B  
2069 VTD SC01C  
2070 VTD SC01D  
2071 VTD SC02  
2072 Block 007809:  
2073 3001 3002 3003  
2074 VTD SC04

2075	VTD SC05A
2076	VTD SC05B
2077	VTD SC05D
2078	VTD SC05E
2079	VTD SC07A
2080	VTD SC07B
2081	VTD SC07C
2082	VTD SC08A
2083	VTD SC08B
2084	VTD SC08C
2085	VTD SC08D
2086	VTD SC08E
2087	VTD SC08F
2088	VTD SC08G
2089	VTD SC08H
2090	VTD SC09A
2091	VTD SC09B
2092	VTD SC09C
2093	VTD SC10
2094	VTD SC11A
2095	VTD SC11B
2096	VTD SC13
2097	VTD SC15
2098	VTD SC16A
2099	VTD SC16B
2100	VTD SC17A
2101	VTD SC17B

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2102	VTD SC17C
2103	VTD SC18A
2104	VTD SC18B
2105	VTD SC18C
2106	VTD SC19A
2107	VTD SC19B
2108	VTD SC20
2109	VTD SC211
2110	VTD SC212
2111	VTD SC21A
2112	VTD SC23A
2113	VTD SC23B
2114	VTD SC23C
2115	VTD SC27
2116	VTD SC29A
2117	VTD SC29B
2118	VTD UC01A
2119	VTD UC01B
2120	VTD UC01C
2121	VTD UC01D
2122	VTD UC01E
2123	VTD UC02A
2124	VTD UC02B
2125	VTD UC031
2126	VTD UC032
2127	VTD UC033
2128	VTD UC035

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LC 47 1166S (SCS)

2129 County Henry GA  
2130 VTD AUSTIN ROAD  
2131 VTD COTTON INDIAN  
2132 VTD DUTCHTOWN  
2133 VTD ELLENWOOD  
2134 VTD FLIPPEN  
2135 VTD HICKORY FLAT  
2136 VTD LIGHTHOUSE  
2137 VTD MOUNT CARMEL  
2138 VTD PATES CREEK  
2139 VTD PLEASANT GROVE  
2140 VTD RED OAK  
2141 VTD SHAKERAG  
2142 VTD STAGECOACH  
2143 VTD STOCKBRIDGE CENTRAL  
2144 VTD STOCKBRIDGE EAST-WEST  
2145 VTD SWAN LAKE

2146 District 014  
2147 County Catoosa GA  
2148 County Chattooga GA  
2149 County Cobb GA  
2150 VTD Austell 1A  
2151 VTD Clarkdale 01  
2152 VTD Clarkdale 02  
2153 VTD Cooper 01

2154 VTD Kemp 02  
 2155 Block 030262:  
 2156 2008  
 2157 Block 030263:  
 2158 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 2001  
 2159 2002 2007  
 2160 VTD Lost Mountain 01  
 2161 VTD Lost Mountain 03  
 2162 VTD Mableton 01  
 2163 Block 031409:  
 2164 1003  
 2165 Block 031414:  
 2166 2012 2013 2014 2015 2016 2017 2018 2020 2021  
 2167 Block 031415:  
 2168 2000 2001 2002 2005 2006 2007 2008 2009 2011 2012 2017 2019  
 2169 2021 2022 2024 2029  
 2170 VTD Mableton 02  
 2171 Block 031306:  
 2172 2022 2023 2024 2027 2029 2030 2032 2033 2037 2038 2040  
 2173 Block 031323:  
 2174 1000 1003 1004 1005 1009 1011 1012 1013 1014 1015 1016 1017  
 2175 1018 1021  
 2176 Block 031414:  
 2177 2025  
 2178 Block 031417:  
 2179 1002 1003 1004 1005 1006 1007 1009 1011 1013 1017 1018 1020  
 2180 1024 1049

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LC 47 1166S (SCS)

2181 VTD Macland 01  
2182 VTD McEachern  
2183 VTD Oregon 01  
2184 VTD Oregon 05  
2185 Block 030271:  
2186 1000 1001 1002 1003 1004 1005 1007  
2187 VTD Powder Springs 1A  
2188 VTD Powder Springs 2a  
2189 VTD Powder Springs 3A  
2190 VTD Sweetwater 01  
2191 County Dade GA  
2192 County Floyd GA  
2193 County Gordon GA  
2194 County Murray GA  
2195 County Paulding GA  
2196 County Polk GA  
2197 County Walker GA  
2198 County Whitfield GA

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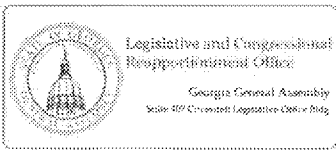
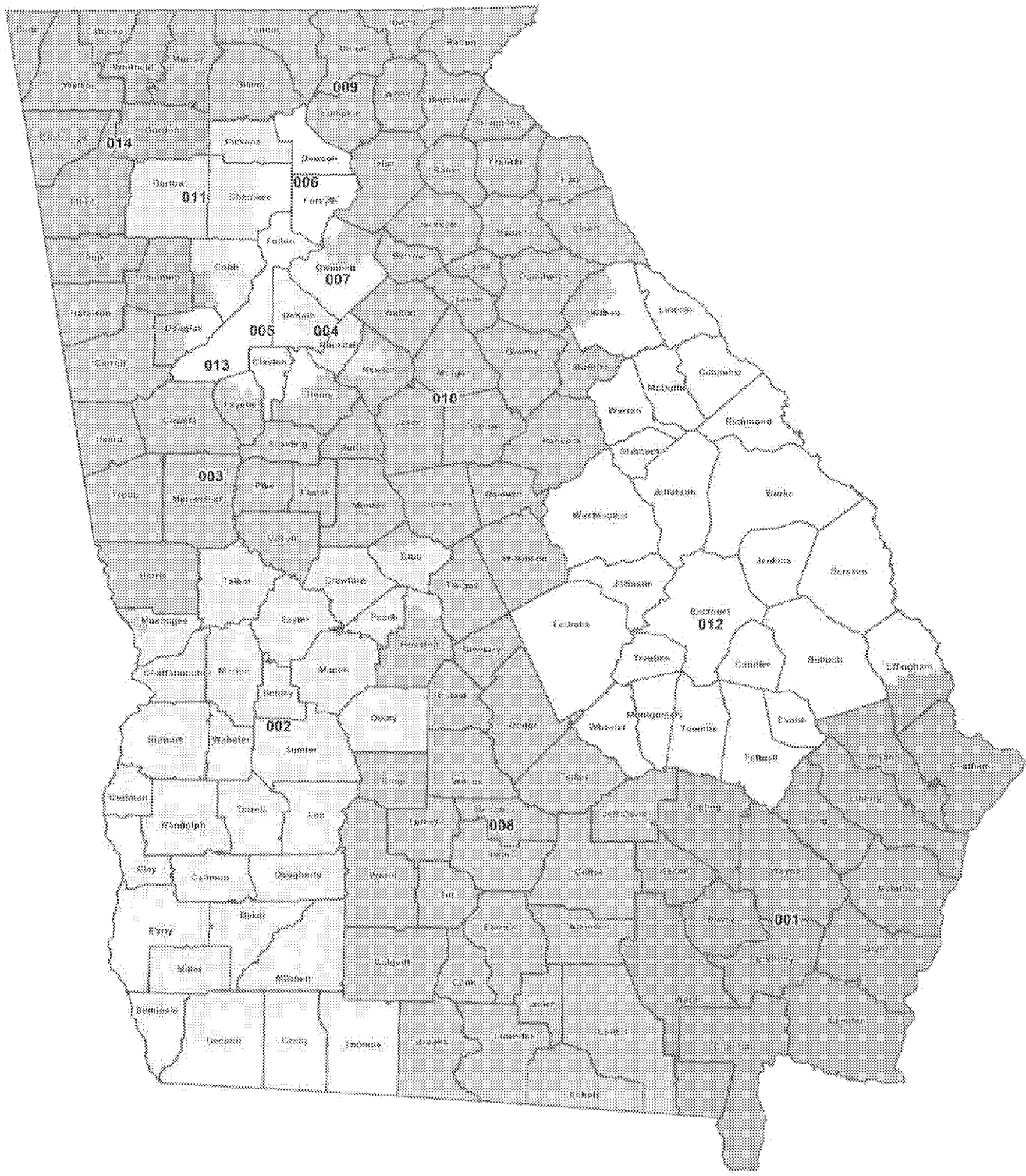
- 84 -

LEGIS00002480

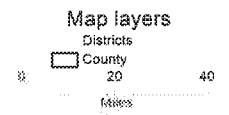
PUBLIC

Client: S018  
Plan: Congress-prop1-2021  
Type: Congress

# Proposed Joint Congressional Districts of Georgia



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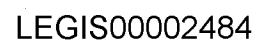




[illegible]



A detailed map of Bibb County, Georgia, showing its various precincts and legislative districts. The map is titled "Bibb County Area" in a white box at the top center. Precincts are labeled with names such as BRANTLEY, BENTON, BURESA, HOWARD, VINEVILLE, EAST MACON, HAZZARD, GODFREY, WARRIOR, RUTLAND, and GOLDEN HILLS. Districts are labeled with numbers: DISTRICT 2, DISTRICT 3, DISTRICT 4, DISTRICT 5, DISTRICT 18, and DISTRICT 19. Major roads like I-16 and I-94 are shown. The map is shaded with different patterns to represent different areas. At the bottom, there is a copyright notice: "©2021 CAL PER ©2020 HENR".



Jest: 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: 5018

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

PUBLIC

House Bill 5EX

By: Representatives Beverly of the 143<sup>rd</sup>, Mitchell of the 88<sup>th</sup>, Hugley of the 136<sup>th</sup>, Alexander of the 66<sup>th</sup>, and Smyre of the 135<sup>th</sup>

A BILL TO BE ENTITLED

AN ACT

- 1 To provide for the composition and number of congressional districts; to provide for a short
- 2 title; to provide when such representatives shall take office; to provide for continuation of
- 3 present congressional districts until a certain time; to provide for related matters; to provide
- 4 an effective date; to repeal a specific Act; to repeal conflicting laws; and for other purposes.

5 BE IT ENACTED BY THE GENERAL ASSEMBLY OF GEORGIA:

6 SECTION 1.

- 7 This Act shall be known and may be cited as the "Georgia Congressional Redistricting
- 8 Act of 2021."

9 SECTION 2.

- 10 (a) For the purpose of electing representatives to the Congress of the United States, the
- 11 State of Georgia is divided into 14 congressional districts. Such congressional districts
- 12 shall be and correspond to those 14 numbered districts described in Appendix A,
- 13 incorporated into and made a part of this Act and further identified as "User: HD143 Plan
- 14 Name: GHDC-GSDC-Cong Plan1 Plan Type: Congress."
- 15 (b) For the purposes of such plan:

H. B. 5EX

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(1) The term "VTD" shall mean and describe the same geographical boundaries as provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia. The separate numeric designations in a district description which are underneath a "VTD" heading shall mean and describe individual Blocks within a VTD as provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia; and

(2) Whenever the description of any congressional district refers to a named county without any additional VTD, it shall mean the geographical boundaries of that county as shown on the census maps for the United States decennial census of 2020 for the State of Georgia.

(c) Any part of the State of Georgia which is not included in any congressional district described in subsection (a) of this section shall be included within that district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.

(d) Any part of the State of Georgia which is described in subsection (a) of this section as being included in a particular congressional district shall nevertheless not be included within such congressional district if such part is not contiguous to such congressional district. Such noncontiguous part shall instead be included within that congressional district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.

(e) The first representatives to the Congress of the United States elected pursuant to the provisions of this Act shall be those who are elected to take office in January, 2023. Until that time:

(1) The representatives to the Congress of the United States elected in 2020 shall continue to serve and shall represent the districts from which elected;

(2) The composition of the districts from which such representatives were elected shall remain the same; and

(3) Any special election to fill a vacancy in the 117th Congress of the United States shall use the composition of districts used for the 2020 general election for representatives to the Congress of the United States.

(f) The provisions of this Act shall be effective for the primaries and elections of 2022 for the purpose of electing the representatives who are to take office in 2023. Successors to those representatives and future successors shall likewise be elected under the provisions of this Act.

### SECTION 3.

The description of Congressional Districts 1 through 14 provided for pursuant to this Act shall supersede and replace the description of Congressional Districts 1 through 14 provided in an Act approved September 6, 2011 (Ga. L. 2011, Ex. Sess., p. 208).

### SECTION 4.

This Act shall become effective upon its approval by the Governor or upon its becoming law without such approval.

### SECTION 5.

An Act to provide for the composition and number of congressional districts, approved September 6, 2011 (Ga. L. 2011, Ex. Sess., p. 208), is hereby repealed in its entirety.

### SECTION 6.

All laws and parts of laws in conflict with this Act are repealed.

H. B. 5EX

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62 Appendix A

63 User: HD143

64 Plan Name: GHDC-GSDC-Cong Plan1

65 Plan Type: Congress

66 District 001

67 County Appling GA

68 County Bacon GA

69 County Brantley GA

70 County Bryan GA

71 County Camden GA

72 County Candler GA

73 VTD CANDLER

74 VTD METTER

75 Block 950100:

76 2008 2009 2010 2011 2012 2013 2017 2018 2019 2020 2021 2022

77 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034

78 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046

79 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058

80 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070

81 2071 2072 2073 2074 2075 3007 3008 3009 3010 3011 3012 3013

82 3014 3015 3016 3017 3018 3019 3020 3021 3022 3023 3024 3025

83 3026 3027 3028 3029 3030 3031 3032 3033 4034 4035 4037 4038

84 4043 4044 4045 4046

85 Block 950200:

86 1022 1023 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010

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87 2011 2022 3008 3009 3010 3011

88 Block 950300:

89 1038 1039 1043 1044 1046

90 County Charlton GA

91 County Chatham GA

92 County Evans GA

93 County Glynn GA

94 County Liberty GA

95 County Long GA

96 County McIntosh GA

97 County Montgomery GA

98 County Pierce GA

99 County Tattnall GA

100 County Toombs GA

101 County Treutlen GA

102 County Wayne GA

103 District 002

104 County Baker GA

105 County Bibb GA

106 VTD EAST MACON 1

107 VTD EAST MACON 2

108 VTD EAST MACON 3

109 VTD EAST MACON 4

110 VTD EAST MACON 5

111 VTD GODFREY 1

112 VTD GODFREY 2

H. B. 5EX

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113 VTD GODFREY 3  
114 VTD GODFREY 4  
115 VTD GODFREY 5  
116 VTD HAZZARD 1  
117 VTD HAZZARD 2  
118 VTD HAZZARD 3  
119 VTD HAZZARD 4  
120 VTD HOWARD 4  
121 VTD HOWARD 5  
122 VTD HOWARD 6  
123 Block 012102:  
124 2003 2004 2006 2011  
125 VTD RUTLAND 1  
126 VTD RUTLAND 2  
127 VTD VINEVILLE 1  
128 VTD VINEVILLE 2  
129 VTD VINEVILLE 3  
130 VTD VINEVILLE 4  
131 VTD VINEVILLE 5  
132 VTD VINEVILLE 6  
133 VTD WARRIOR 1  
134 VTD WARRIOR 2  
135 County Calhoun GA  
136 County Chattahoochee GA  
137 County Clay GA  
138 County Crawford GA  
139 County Crisp GA

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140 County Decatur GA  
 141 County Dooly GA  
 142 County Dougherty GA  
 143 County Early GA  
 144 County Grady GA  
 145 County Houston GA  
 146 VTD HHPC

147 Block 020108:

148 2016 2017 2027 2028 2029 2035 3006 3019

149 Block 020110:

150 1009

151 Block 020111:

152 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

153 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

154 1024 1025 1026 1027 1028 1029 1030 1031 1032 2000 2001 2002

155 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014

156 2015 2016

157 Block 020200:

158 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

159 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

160 1024 1025 1026 1027 1028 1029 1030 2000 2001 2002 2003 2004

161 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 3000 3001

162 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011 3012 4000

163 4001 4002 4003 4004 4010 4011 4012 4013 4014 4015 4016 4017

164 4018 4019 4020 4021 4024 4025 4026 4027 4028 4029 4030 4031

165 4032 4033 4034 4035 4036 4037 4038 4039 4040 4041 4042

166 Block 020302:

H. B. 5EX

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167        4013 4015 4016 4017 4018  
 168        Block 020400:  
 169        1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1050  
 170        1051 1052 1057 1058 1059  
 171        Block 020800:  
 172        2006 2007 2008 2014 2015 2016 2017 2018  
 173        Block 020900:  
 174        1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 175        1012 1013 1014 1015 1016 2000 2001 2002 2003 2004 2005 2006  
 176        2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018  
 177        2019 2020 2021 2022 2023 2024 2025 2026 3000 3001 3002 3003  
 178        3004 3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015  
 179        3016 3017 3018 3019 4000 4001 4002 4003 4005 4006 4007 4011  
 180        4012 4013 4014 4015 4023 4024 4026  
 181        VTD NSES  
 182        VTD RECR  
 183        County Lee GA  
 184        County Macon GA  
 185        County Marion GA  
 186        County Miller GA  
 187        County Mitchell GA  
 188        County Muscogee GA  
 189        VTD CARVER/MACK  
 190        VTD COLUMBUS TECH  
 191        VTD CUSSETA RD  
 192        VTD EDGEWOOD BAPTIST  
 193        VTD EPWORTH UMC

H. B. 5EX

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194 VTD FAITH TABERNACLE  
195 VTD FIRST AFRICAN  
196 VTD FORT BENNING 1  
197 VTD FORT BENNING 2  
198 VTD FORT BENNING 3  
199 VTD FORT BENNING 4  
200 VTD FORT BENNING 5  
201 VTD FORT/WADDELL  
202 VTD GENTIAN/REESE @LDS  
203 VTD MARIANNA GALLOPS  
204 VTD MT PILGRIM  
205 VTD OUR LADY OF LOURDES  
206 VTD PSALMOND/MATHEWS  
207 VTD ROTHSCHILD  
208 VTD SALVATION ARMY  
209 VTD ST ANDREWS/MIDLAND  
210 VTD ST JOHN/BELVEDERE  
211 VTD ST PAUL/CLUBVIEW  
212 VTD WYNNNTON/BRITT  
213 County Peach GA  
214 County Quitman GA  
215 County Randolph GA  
216 County Schley GA  
217 County Seminole GA  
218 County Stewart GA  
219 County Sumter GA  
220 County Talbot GA

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221 County Taylor GA  
 222 County Terrell GA  
 223 County Thomas GA  
 224 VTD DOUGLASS  
 225 VTD FIRE STATION #2  
 226 Block 960800:  
 227 1000 1001 1002 1003 1004 1005 1006 1008 1010 1011 1016 1017  
 228 1018 1020 1022 1023 1024 1025 1027 1028 1029 1030 1031 1032  
 229 1033 1034 1035 1036 1037 1038 1039 1040 1041 1042 1043 1044  
 230 1045 1046 1047 1048 1050 1053 1054 1055 1056 1057 1067 1069  
 231 1070 1071 5009 5010 5011 5016 5017 5018 5019 5020 5021 5022  
 232 5024 5027 5036 5038  
 233 Block 961000:  
 234 3050  
 235 VTD GATLIN CREEK  
 236 Block 960502:  
 237 1050 1051 1052  
 238 Block 961000:  
 239 1029 1030 2018 2019 2020 2022 2025  
 240 VTD HARPER  
 241 VTD JERGER  
 242 VTD MEIGS  
 243 VTD METCALFE  
 244 VTD NEW COVENANT  
 245 VTD OCHLOCKNEE  
 246 VTD REMINGTON  
 247 Block 960501:

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248 1012 1015 1018 1023 3023 3024 3025

249 Block 960502:

250 1018 1019 1020 1021 1024 1029 1030 1033 1046 1047 1053 2017

251 2022 2023 2024 2025 2026 2028 2029 2030 2031

252 Block 960601:

253 2005 2006 2007 2012 2013 2014 2016 3000 3001 3002 3021 3022

254 3023 3024 3025 3026 3027 3028 3029 3030 3031 3032 3033

255 Block 960602:

256 1000 1001 1002 1003 1004 1005 1006 1010 2000 2001 2002 2003

257 2004 2005 2006 2007 2008 2012 2013 2014 2015 2016 2017

258 Block 960702:

259 3046

260 Block 960900:

261 1001 1006 1007 1008 1009 1010 1011 1012 1017 1018 1019 2001

262 2004 2005 2008 2009 2010 2039

263 VTD RESOURCE CENTER

264 VTD SCOTT

265 County Webster GA

266 District 003

267 County Carroll GA

268 County Coweta GA

269 County Fayette GA

270 VTD ABERDEEN

271 VTD BRAELINN

272 VTD BROOKS

273 Block 140502:

H. B. 5EX

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274 1011 1026 2010 2011 2021 2022 2023 2024  
275 VTD CAMP CREEK  
276 VTD FIELDING RIDGE  
277 VTD FLAT CREEK  
278 VTD KEDRON  
279 VTD MCINTOSH  
280 VTD OAK GROVE  
281 VTD RISING STAR  
282 VTD SHAKERAG WEST  
283 VTD WILLOWBEND  
284 VTD WINDGATE  
285 County Haralson GA  
286 County Harris GA  
287 County Heard GA  
288 County Lamar GA  
289 County Meriwether GA  
290 County Muscogee GA  
291 VTD BRITT DAVID  
292 VTD CORNERSTONE  
293 VTD MOON/MORNINGSIDE  
294 VTD ST MARK/HEIFERHORN  
295 VTD ST. PETER  
296 VTD WYNNBROOK  
297 County Paulding GA  
298 County Pike GA  
299 County Polk GA  
300 VTD BLOOMING GROVE

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301 VTD CEDARTOWN

302 Block 010400:

303 4001 4002 4010 4011 4012 4014 4015 4016 4017 4018 4019 4020

304 4021 4023 4024 4025 4026 4027 4028 4029 4030 4031

305 Block 010500:

306 6020 6028 6031 6032 6033 6034 6035 6036 6039 6040 6041

307 VTD FISH CREEK

308 VTD ROCKMART

309 VTD YOUNGS GROVE

310 County Troup GA

311 County Upson GA

312 District 004

313 County DeKalb GA

314 VTD Allgood Elem

315 VTD Austin Drive

316 VTD Bethune Middle

317 VTD Brockett (TUC)

318 VTD Brockett Elem (TUC)

319 VTD Browns Mill Elem

320 VTD Canby Lane Elem

321 VTD Candler - Murphey Candler Elem

322 VTD Chapel Hill Elem

323 VTD Columbia Drive

324 VTD Covington Hwy

325 VTD Crossroads

326 VTD Dunaire Elem

H. B. 5EX

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327 VTD Fairington Elem  
328 VTD Flakes Mill Fire Station  
329 VTD Flat Rock Elem  
330 VTD Flat Shoals Parkway  
331 VTD Freedom Middle  
332 VTD Glenhaven  
333 VTD Glenwood Road  
334 VTD Hambrick Elem  
335 VTD Harris - Narvie J. Harris Elem  
336 VTD Hugh Howell (TUC)  
337 VTD Idlewood Elem (TUC)  
338 VTD Indian Creek  
339 VTD Jolly Elem  
340 VTD Kelley Chapel Road  
341 VTD King - ML King Jr High  
342 VTD Lithonia (LIT)  
343 VTD Lithonia High  
344 VTD Marbut Elem  
345 VTD Mathis - Bob Mathis Elem  
346 VTD McWilliams  
347 VTD Memorial South  
348 VTD Miller - Eldridge L. Miller Elem  
349 VTD Miller Grove  
350 VTD Miller Grove High  
351 VTD Miller Grove Road  
352 VTD Montreal (TUC)  
353 VTD North Hairston

H. B. SEX

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354 VTD Panola  
355 VTD Panola Road  
356 VTD Panola Way Elem  
357 VTD Peachcrest  
358 VTD Pine Lake (PIN)  
359 VTD Princeton Elem  
360 VTD Rainbow Elem  
361 VTD Redan Elem  
362 VTD Redan Middle  
363 VTD Redan Road  
364 VTD Redan-Trotti Library  
365 VTD Rock Chapel Elem  
366 VTD Rock Chapel Road  
367 VTD Rockbridge Elem  
368 VTD Rockbridge Road  
369 VTD Rowland Elem  
370 VTD Rowland Road  
371 VTD Salem Middle  
372 VTD Shadow Rock Elem  
373 VTD Smoke Rise (TUC)  
374 VTD Snapfinger Elem  
375 VTD Snapfinger Road North  
376 VTD Snapfinger Road South  
377 VTD South Deshon  
378 VTD South Hairston  
379 VTD Stephenson High  
380 VTD Stephenson Middle

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381 VTD Stone Mill Elem  
 382 VTD Stone Mountain (STO)  
 383 VTD Stone Mountain Champion (STO)  
 384 VTD Stone Mountain Elem  
 385 VTD Stone Mountain Middle (TUC)  
 386 VTD Stonecrest Library  
 387 VTD Stoneview Elem  
 388 VTD Wesley Chapel Library  
 389 VTD White Oak  
 390 VTD Woodridge Elem  
 391 VTD Woodrow Road  
 392 VTD Wynbrooke Elem  
 393 VTD Young Road  
 394 County Gwinnett GA  
 395 VTD BAYCREEK A  
 396 VTD BAYCREEK B  
 397 VTD BAYCREEK E  
 398 VTD BAYCREEK F  
 399 VTD BAYCREEK G  
 400 Block 050744:  
 401 2010 2012 2013 2014 2015 2016 2019 2020 2021 2022 2023 2024  
 402 Block 050746:  
 403 4009 4024 4025 4026  
 404 Block 050747:  
 405 1000 1001 1002 1008 1009 2001 2002 2005 2006 2007 2008 2009  
 406 2010 2011 2012 2013 2014 2015  
 407 Block 050748:

H. B. SEX

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408 1007 1008 1009 1010 1011 1012 1013 1014 1016 1017 1018 1019  
409 1020 1021 1022 2004 2005  
410 VTD BAYCREEK J  
411 VTD BERKSHIRE D  
412 VTD BERKSHIRE E  
413 VTD BERKSHIRE G  
414 VTD BERKSHIRE J  
415 VTD BERKSHIRE M  
416 VTD BERKSHIRE N  
417 VTD BERKSHIRE O  
418 VTD BERKSHIRE Q  
419 VTD CATES A  
420 VTD CATES B  
421 VTD CATES C  
422 VTD CATES D  
423 VTD CATES E  
424 VTD CATES F  
425 VTD CATES G  
426 VTD CATES H  
427 VTD CATES I  
428 VTD CATES J  
429 VTD CATES K  
430 VTD CATES L  
431 VTD CATES M  
432 VTD CATES N  
433 VTD CATES O  
434 VTD GARNERS A

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435 VTD GARNERS B  
 436 VTD GARNERS C  
 437 VTD GARNERS D  
 438 VTD GARNERS F  
 439 VTD ROCKBRIDGE A  
 440 VTD ROCKBRIDGE B  
 441 VTD ROCKBRIDGE C  
 442 VTD ROCKBRIDGE D  
 443 VTD ROCKBRIDGE E  
 444 VTD ROCKBRIDGE F  
 445 VTD ROCKBRIDGE G  
 446 County Henry GA  
 447 VTD EAST LAKE  
 448 VTD KELLEYTOWN  
 449 VTD LAKE DOW  
 450 VTD MCDONOUGH  
 451 VTD MCDONOUGH CENTRAL  
 452 Block 070307:  
 453 2004 2013 2014 2017 2018 2019 2020 2021 3000 3001 3002 3003  
 454 3005 3006 3007 3008 3009 3010 3013  
 455 VTD MCMULLEN  
 456 VTD MT. BETHEL  
 457 VTD PLEASANT GROVE  
 458 VTD SANDY RIDGE  
 459 VTD TIMBERRIDGE  
 460 VTD TUSSAHAW  
 461 County Newton GA

H. B. 5EX

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462 County Rockdale GA

463 District 005

464 County Clayton GA

465 VTD OAK 1

466 County DeKalb GA

467 VTD Avondale (AVO)

468 VTD Avondale High

469 VTD Bouldercrest Road

470 VTD Boulevard (ATL)

471 VTD Briar Vista Elem (UNI & ATL)

472 VTD Briarcliff

473 VTD Burgess Elem (ATL)

474 VTD Candler

475 VTD Cedar Grove Elem

476 VTD Cedar Grove Middle

477 VTD Cedar Grove South

478 VTD Clairemont East (DEC)

479 VTD Clairemont West (DEC)

480 VTD Clairmont Road

481 VTD Clarkston

482 VTD Clifton

483 VTD Coan Recreation Center (ATL)

484 VTD Columbia Elem

485 VTD Columbia Middle

486 VTD Coralwood

487 VTD Covington

H. B. 5EX

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488 VTD Druid Hills  
489 VTD East Lake (ATL)  
490 VTD Emory Road  
491 VTD Emory South (UNI & ATL)  
492 VTD Epworth (ATL)  
493 VTD Fernbank  
494 VTD Flat Shoals  
495 VTD Flat Shoals Elem  
496 VTD Flat Shoals Library  
497 VTD Glennwood (DEC)  
498 VTD Gresham Road  
499 VTD Harris - Margaret Harris Ed  
500 VTD Johnson Estates (ATL)  
501 VTD Kelley Lake Elem  
502 VTD Knollwood Elem  
503 VTD Lavista  
504 VTD Lavista Road  
505 VTD Lin - Mary Lin Elem (ATL)  
506 VTD McLendon  
507 VTD McNair  
508 VTD McNair Academy  
509 VTD McNair High  
510 VTD Meadowview  
511 VTD Medlock  
512 VTD Metropolitan (ATL)  
513 VTD Midway Elem  
514 VTD Montclair Elem (BHAVN)

H. B. SEX

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515 VTD North Decatur  
516 VTD Northlake  
517 VTD Oak Grove Elem  
518 VTD Oak View Elem  
519 VTD Oakhurst (DEC)  
520 VTD Piney Grove  
521 VTD Ponce de Leon (DEC)  
522 VTD Rehoboth  
523 VTD Renfroe Middle (DEC)  
524 VTD Sagamore Hills Elem  
525 VTD Scott  
526 VTD Shamrock  
527 VTD Shaw Elementary  
528 VTD Terry Mill  
529 VTD Toney Elem  
530 VTD Valley Brook  
531 VTD Wadsworth  
532 VTD Winnona Park (DEC)  
533 VTD Woodward Elem (BHAVN)  
534 County Fulton GA  
535 VTD 01A  
536 VTD 01B  
537 VTD 01C  
538 VTD 01D  
539 VTD 01E  
540 VTD 01F  
541 VTD 01G

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542 VTD 01H  
543 VTD 01I  
544 VTD 01J  
545 VTD 01P  
546 VTD 01R  
547 VTD 01S  
548 VTD 01T  
549 VTD 02A  
550 VTD 02B  
551 VTD 02C  
552 VTD 02D  
553 VTD 02E  
554 VTD 02F1  
555 VTD 02F2  
556 VTD 02G  
557 VTD 02J  
558 VTD 02K  
559 VTD 02L1  
560 VTD 02L2  
561 VTD 02S  
562 VTD 02W  
563 VTD 03A  
564 VTD 03B  
565 VTD 03C  
566 VTD 03D  
567 VTD 03E  
568 VTD 03F

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569 VTD 03G  
570 VTD 03H  
571 VTD 03I  
572 VTD 03L  
573 VTD 03M  
574 VTD 03N  
575 VTD 03P1A  
576 VTD 03P1B  
577 VTD 03P2  
578 VTD 03S  
579 VTD 03T  
580 VTD 04A  
581 VTD 04B  
582 VTD 04C  
583 VTD 04D  
584 VTD 04F  
585 VTD 04G  
586 VTD 04I  
587 VTD 04J  
588 VTD 04K  
589 VTD 04L  
590 VTD 04M  
591 VTD 04S  
592 VTD 04T  
593 VTD 04V  
594 VTD 04W  
595 VTD 04X1

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596 VTD 04X2  
597 VTD 05A1  
598 VTD 05A2  
599 VTD 05B  
600 VTD 05C  
601 VTD 05D  
602 VTD 05F  
603 VTD 05J  
604 VTD 05K  
605 VTD 06B  
606 VTD 06D  
607 VTD 06E  
608 VTD 06F  
609 VTD 06G  
610 VTD 06I  
611 VTD 06J  
612 VTD 06L1  
613 VTD 06L2  
614 VTD 06N  
615 VTD 06Q  
616 VTD 06R  
617 VTD 07A  
618 VTD 07B  
619 VTD 07C  
620 VTD 07D  
621 VTD 07E  
622 VTD 07F

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623 VTD 07H  
624 VTD 07J  
625 VTD 07M  
626 VTD 07N  
627 VTD 08A  
628 VTD 08B  
629 VTD 08C  
630 VTD 08D  
631 VTD 08E  
632 VTD 08F1  
633 VTD 08F2  
634 VTD 08G  
635 VTD 08H  
636 VTD 08J  
637 VTD 08K  
638 VTD 08L  
639 VTD 08M  
640 VTD 08N1  
641 VTD 08N2  
642 VTD 08P  
643 VTD 09A  
644 VTD 09B  
645 VTD 09C  
646 VTD 09D  
647 VTD 09E  
648 VTD 09F  
649 VTD 09G

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650 VTD 09H  
651 VTD 09I  
652 VTD 09K  
653 VTD 09M  
654 VTD 10A  
655 VTD 10B  
656 VTD 10C  
657 VTD 10D  
658 VTD 10E  
659 VTD 10F  
660 VTD 10G  
661 VTD 10H1  
662 VTD 10H2  
663 VTD 10I  
664 VTD 10J  
665 VTD 10K  
666 VTD 10M  
667 VTD 10P  
668 VTD 10R  
669 VTD 11B  
670 VTD 11C  
671 VTD 11E1  
672 VTD 11E2  
673 VTD 11E3  
674 VTD 11G  
675 VTD 11H  
676 VTD 11J

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677 VTD 11K  
678 VTD 11M  
679 VTD 11N  
680 VTD 11P  
681 VTD 11R  
682 VTD 12A  
683 VTD 12D  
684 VTD 12E1  
685 VTD 12E2  
686 VTD 12F  
687 VTD 12G  
688 VTD 12H1  
689 VTD 12H2  
690 VTD 12I  
691 VTD 12J  
692 VTD 12K  
693 VTD 12L  
694 VTD 12M  
695 VTD 12N  
696 VTD 12S  
697 VTD CP011  
698 VTD CP012  
699 VTD CP01B  
700 VTD CP02  
701 VTD CP04A  
702 VTD CP04B  
703 VTD CP07A

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704 VTD CP07C  
 705 VTD CP07D  
 706 VTD CP07E  
 707 VTD CP07F  
 708 VTD EP01A  
 709 VTD EP01B  
 710 VTD EP02A  
 711 VTD EP02B  
 712 VTD EP02C  
 713 VTD EP02D  
 714 VTD EP02E  
 715 VTD EP03A  
 716 VTD EP03B  
 717 VTD EP04A  
 718 Block 011306:  
 719 1000 1001 1002 1008  
 720 Block 011307:  
 721 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 722 1012 1013 1014 2000 2001 2002 2003 2004 2005 2006 2007 2008  
 723 2009 2010 2011 2012 3005 3006 3007 3008 3009  
 724 Block 011308:  
 725 1000 1009 1016  
 726 Block 011309:  
 727 1006 2000 2001 2002 3000 3001 3002 3003 3004 3005 3006 3007  
 728 3008 3009 3010 3011  
 729 Block 011310:  
 730 3002 3003 3004 3005 3006 3007 3008 3009

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731 VTD HP01  
732 VTD SC30B  
  
733 District 006  
734 County Cobb GA  
735 VTD Addison 01  
736 VTD Bells Ferry 02  
737 VTD Blackwell 01  
738 VTD Chestnut Ridge 01  
739 VTD Davis 01  
740 VTD Dickerson 01  
741 VTD Dodgen 01  
742 VTD East Piedmont 01  
743 Block 030506:  
744 1016 1017 1018 1023 2000 2001 2002 2003 2005 3002 3004 3005  
745 3013  
746 VTD Eastside 01  
747 VTD Eastside 02  
748 VTD Elizabeth 02  
749 VTD Elizabeth 03  
750 VTD Elizabeth 04  
751 VTD Elizabeth 05  
752 VTD Fullers Park 01  
753 VTD Garrison Mill 01  
754 VTD Gritters 01  
755 VTD Hightower 01  
756 VTD Kell 01

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757 VTD Lassiter 01  
 758 VTD Mabry 01  
 759 VTD Marietta 5A  
 760 Block 030505:  
 761 1013 1014 1015 1016 1017 3003 3005 3012 3013 3014 3015 4007  
 762 4008 4025 4028  
 763 VTD Marietta 6A  
 764 Block 030410:  
 765 1004 1005 1007 1008 1009 3000 3004 3005  
 766 Block 030505:  
 767 1006 1007 1008 1009 1010 1011 1012 2007 2008 2009 2010 2011  
 768 3000 3001 3002  
 769 Block 030508:  
 770 1025  
 771 Block 030511:  
 772 2007 2013 2018 2019 2020 2021 2022 2023 2024  
 773 VTD Marietta 6B  
 774 VTD Marietta 7A  
 775 Block 030405:  
 776 4001 4002 4005 4006 4007 4012 4013 4017 4018 4020 4021 4022  
 777 4023 4024 4025 4026 4027 4028 4029 4030 4031 4032 4033  
 778 Block 030410:  
 779 3006 3012  
 780 Block 030505:  
 781 4030 4031  
 782 VTD McCleskey 01  
 783 VTD Mount Bethel 01

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784 VTD Mount Bethel 03  
785 VTD Mount Bethel 04  
786 VTD Murdock 01  
787 VTD Nicholson 01  
788 VTD Pope 01  
789 VTD Post Oak 01  
790 VTD Powers Ferry 01  
791 Block 030405:  
792 4003 4004 4008 4009 4010 4011 4014 4015 4016 4019 4034  
793 Block 030410:  
794 3007 3009 3010 3011  
795 VTD Rocky Mount 01  
796 VTD Roswell 01  
797 VTD Roswell 02  
798 VTD Sandy Plains 01  
799 VTD Sewell Mill 01  
800 VTD Sewell Mill 03  
801 VTD Shallowford Falls 01  
802 VTD Simpson 01  
803 VTD Sope Creek 01  
804 VTD Sope Creek 02  
805 VTD Sope Creek 03  
806 VTD Timber Ridge 01  
807 VTD Willeo 01  
808 County DeKalb GA  
809 VTD Ashford Dunwoody Road (BHAVN)  
810 VTD Ashford Park Elem (BHAVN)

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811 VTD Ashford Parkside (BHAVN)  
812 VTD Austin (DUN)  
813 VTD Briarlake Elem  
814 VTD Briarwood (BHAVN)  
815 VTD Brookhaven (BHAVN)  
816 VTD Chamblee (CHA)  
817 VTD Chamblee 2 (CHA)  
818 VTD Chesnut Elem (DUN)  
819 VTD Cross Keys High (BHAVN)  
820 VTD Doraville North (DOR)  
821 VTD Doraville South (DOR)  
822 VTD Dresden Elem (CHA)  
823 VTD Dunwoody (DUN)  
824 VTD Dunwoody 2 (DUN)  
825 VTD Dunwoody Library (DUN)  
826 VTD Embry Hills  
827 VTD Evansdale Elem  
828 VTD Georgetown (DUN)  
829 VTD Hawthorne Elem  
830 VTD Henderson Mill  
831 VTD Huntley Hills Elem (CHA)  
832 VTD Kingsley Elem (DUN)  
833 VTD Kittredge Elem (BHAVN)  
834 VTD Lakeside High  
835 VTD Livsey Elem  
836 VTD Midvale Elem (TUC)  
837 VTD Midvale Road

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838 VTD Montgomery Elem (BHAVN)  
839 VTD Mount Vernon East (DUN)  
840 VTD Mt. Vernon West (DUN)  
841 VTD North Peachtree (DUN)  
842 VTD Oakcliff Elem  
843 VTD Peachtree Middle (DUN)  
844 VTD Pleasantdale Road  
845 VTD Silver Lake (ATL & BHAVN)  
846 VTD Skyland (BHAVN)  
847 VTD Tilly Mill Road (DUN)  
848 VTD Tucker (TUC)  
849 VTD Tucker Library (TUC)  
850 VTD Warren Tech  
851 VTD Winters Chapel (DUN)  
852 County Fulton GA  
853 VTD AP01A  
854 VTD AP01B  
855 VTD AP01C  
856 VTD AP01D  
857 VTD AP01E  
858 VTD AP021  
859 VTD AP022  
860 VTD AP02B  
861 VTD AP03  
862 VTD AP04A  
863 VTD AP04B  
864 VTD AP05

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865 VTD AP06  
866 VTD AP07A  
867 VTD AP07B  
868 VTD AP09A  
869 VTD AP09B  
870 VTD AP10  
871 VTD AP12A  
872 VTD AP12B  
873 VTD AP12C  
874 VTD AP12D  
875 VTD AP14  
876 VTD JC01  
877 VTD JC02  
878 VTD JC03A  
879 VTD JC03B  
880 VTD JC04A  
881 VTD JC04B  
882 VTD JC05  
883 VTD JC06  
884 VTD JC07  
885 VTD JC08  
886 VTD JC09  
887 VTD JC10  
888 VTD JC11  
889 VTD JC12  
890 VTD JC13A  
891 VTD JC13B

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892	VTD JC14
893	VTD JC15
894	VTD JC16
895	VTD JC18
896	VTD JC19
897	VTD ML011
898	VTD ML012
899	VTD ML01B
900	VTD ML021
901	VTD ML022
902	VTD ML023
903	VTD ML024
904	VTD ML03
905	VTD ML04A
906	VTD ML04B
907	VTD ML04C
908	VTD ML05A
909	VTD ML05B
910	VTD ML05C
911	VTD ML06A
912	VTD ML06B
913	VTD ML071
914	VTD ML072
915	VTD ML07A
916	VTD MP01
917	VTD RW01
918	VTD RW02

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919 VTD RW03  
920 VTD RW04  
921 VTD RW05  
922 VTD RW06  
923 VTD RW07A  
924 VTD RW07B  
925 VTD RW08  
926 VTD RW09  
927 VTD RW10  
928 VTD RW11A  
929 VTD RW11B  
930 VTD RW12  
931 VTD RW13  
932 VTD RW16  
933 VTD RW17  
934 VTD RW19  
935 VTD RW20  
936 VTD RW21  
937 VTD RW22A  
938 VTD RW22B  
939 VTD SS01  
940 VTD SS02A  
941 VTD SS02B  
942 VTD SS03  
943 VTD SS04  
944 VTD SS05  
945 VTD SS06

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946 VTD SS07A  
947 VTD SS07B  
948 VTD SS07C  
949 VTD SS08A  
950 VTD SS08B  
951 VTD SS08C  
952 VTD SS08D  
953 VTD SS09A  
954 VTD SS09B  
955 VTD SS11A  
956 VTD SS11B  
957 VTD SS11C  
958 VTD SS11D  
959 VTD SS12  
960 VTD SS13A  
961 VTD SS13B  
962 VTD SS14  
963 VTD SS15A  
964 VTD SS15B  
965 VTD SS16  
966 VTD SS17  
967 VTD SS18A  
968 VTD SS18B  
969 VTD SS19A  
970 VTD SS19B  
971 VTD SS20  
972 VTD SS22

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973 VTD SS26  
 974 VTD SS29A  
 975 VTD SS29B  
 976 VTD SS31  
  
 977 District 007  
 978 County Gwinnett GA  
 979 VTD BAYCREEK C  
 980 VTD BAYCREEK D  
 981 VTD BAYCREEK G  
 982 Block 050744:  
 983 2004 2005 2011  
 984 Block 050746:  
 985 4016 4019 4020 4021 4022 4023  
 986 Block 050747:  
 987 2000 2003 2004  
 988 Block 050748:  
 989 1000 1001 1002 1003 1004 1005 1006 1015 2008 2009 2010 2011  
 990 2012 2013 2014  
 991 VTD BAYCREEK H  
 992 VTD BAYCREEK I  
 993 VTD BAYCREEK K  
 994 VTD BERKSHIRE A  
 995 VTD BERKSHIRE B  
 996 VTD BERKSHIRE F  
 997 VTD BERKSHIRE H  
 998 VTD BERKSHIRE L

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LEGIS00002525



999	VTD BERKSHIRE P
1000	VTD DACULA
1001	VTD DULUTH A
1002	VTD DULUTH B
1003	VTD DULUTH C
1004	VTD DULUTH D
1005	VTD DULUTH E
1006	VTD DULUTH F
1007	VTD DULUTH G
1008	VTD DULUTH H
1009	VTD DULUTH I
1010	VTD DULUTH K
1011	VTD DUNCANS A
1012	VTD DUNCANS B
1013	VTD DUNCANS C
1014	VTD DUNCANS D
1015	VTD GOODWINS A
1016	VTD GOODWINS B
1017	VTD GOODWINS C
1018	VTD GOODWINS D
1019	VTD GOODWINS E
1020	VTD GOODWINS F
1021	VTD GOODWINS G
1022	VTD GOODWINS H
1023	VTD GOODWINS I
1024	VTD HARBINS A
1025	VTD HARBINS B

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1026 VTD HARBINS C  
1027 VTD HOG MOUNTAIN A  
1028 VTD HOG MOUNTAIN B  
1029 VTD HOG MOUNTAIN C  
1030 VTD HOG MOUNTAIN D  
1031 VTD LAWRENCEVILLE A  
1032 VTD LAWRENCEVILLE B  
1033 VTD LAWRENCEVILLE C  
1034 VTD LAWRENCEVILLE D  
1035 VTD LAWRENCEVILLE E  
1036 VTD LAWRENCEVILLE F  
1037 VTD LAWRENCEVILLE G  
1038 VTD LAWRENCEVILLE H  
1039 VTD LAWRENCEVILLE I  
1040 VTD LAWRENCEVILLE J  
1041 VTD LAWRENCEVILLE K  
1042 VTD LAWRENCEVILLE L  
1043 VTD LAWRENCEVILLE M  
1044 VTD LAWRENCEVILLE N  
1045 VTD MARTINS A  
1046 VTD MARTINS B  
1047 VTD MARTINS C  
1048 VTD MARTINS D  
1049 VTD MARTINS E  
1050 VTD MARTINS F  
1051 VTD MARTINS G  
1052 VTD MARTINS H

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1053 VTD MARTINS I  
1054 VTD MARTINS J  
1055 VTD MARTINS K  
1056 VTD PINCKNEYVILLE A1  
1057 VTD PINCKNEYVILLE B  
1058 VTD PINCKNEYVILLE C  
1059 VTD PINCKNEYVILLE D  
1060 VTD PINCKNEYVILLE E  
1061 VTD PINCKNEYVILLE F  
1062 VTD PINCKNEYVILLE H  
1063 VTD PINCKNEYVILLE I  
1064 VTD PINCKNEYVILLE J  
1065 VTD PINCKNEYVILLE K  
1066 VTD PINCKNEYVILLE L  
1067 VTD PINCKNEYVILLE M  
1068 VTD PINCKNEYVILLE N  
1069 VTD PINCKNEYVILLE O  
1070 VTD PINCKNEYVILLE P  
1071 VTD PINCKNEYVILLE Q  
1072 VTD PINCKNEYVILLE S  
1073 VTD PINCKNEYVILLE T  
1074 VTD PINCKNEYVILLE U  
1075 VTD PINCKNEYVILLE V  
1076 VTD PINCKNEYVILLE W  
1077 VTD PINCKNEYVILLE X  
1078 VTD PINCKNEYVILLE Y  
1079 VTD PINCKNEYVILLE Z

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1080 VTD PINKCNEYVILLE A  
1081 VTD PUCKETTS A  
1082 VTD PUCKETTS B  
1083 VTD PUCKETTS C  
1084 VTD PUCKETTS D  
1085 VTD PUCKETTS E  
1086 VTD ROCKYCREEK A  
1087 VTD ROCKYCREEK B  
1088 VTD ROCKYCREEK C  
1089 VTD SUGAR HILL A  
1090 VTD SUGAR HILL B  
1091 VTD SUGAR HILL C  
1092 VTD SUGAR HILL D  
1093 VTD SUGAR HILL E  
1094 VTD SUGAR HILL F  
1095 VTD SUGAR HILL G  
1096 VTD SUWANEE A  
1097 VTD SUWANEE B  
1098 VTD SUWANEE C  
1099 VTD SUWANEE D  
1100 VTD SUWANEE E  
1101 VTD SUWANEE F  
1102 VTD SUWANEE G  
1103 VTD SUWANEE H

1104 District 008

1105 County Atkinson GA

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1106 County Ben Hill GA  
 1107 County Berrien GA  
 1108 County Bibb GA  
 1109 VTD HOWARD 1  
 1110 VTD HOWARD 2  
 1111 VTD HOWARD 3  
 1112 VTD HOWARD 6  
 1113 Block 012102:  
 1114 2005 2007 2008 2009 2010 2012 3000 3001 3002 3003 3005 3010  
 1115 3011 3013 3014 4000 4001 4002 4003 4004 4005 4006 4007 4010  
 1116 4011 4012 4013  
 1117 Block 013408:  
 1118 1020 1021 1022 1023  
 1119 VTD HOWARD 7  
 1120 County Bleckley GA  
 1121 County Brooks GA  
 1122 County Clinch GA  
 1123 County Coffee GA  
 1124 County Colquitt GA  
 1125 County Cook GA  
 1126 County Dodge GA  
 1127 County Echols GA  
 1128 County Houston GA  
 1129 VTD ANNX  
 1130 VTD BMS  
 1131 VTD CENT  
 1132 VTD CGTC

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1133 VTD FMMS  
 1134 VTD HAFS  
 1135 VTD HCTC  
 1136 VTD HEFS  
 1137 VTD HHPC  
 1138 Block 020900:  
 1139 4008 4009 4010 4016 4017 4018 4019 4020 4021 4022 4025  
 1140 Block 021001:  
 1141 2009  
 1142 VTD MCMS  
 1143 VTD ROZR  
 1144 VTD TMS  
 1145 VTD TWPK  
 1146 VTD VHS  
 1147 County Irwin GA  
 1148 County Jeff Davis GA  
 1149 County Jones GA  
 1150 County Lanier GA  
 1151 County Laurens GA  
 1152 VTD BURCH  
 1153 VTD CADWELL  
 1154 VTD CALHOUN PARK  
 1155 Block 950500:  
 1156 1029 2021 2022 2023 2024 2028 2034 2035 2036 2037 2038 2039  
 1157 2040 2041 3062 3063 3064 3109  
 1158 Block 950800:  
 1159 1006 1007 1009 1010 1011 1012 1014 1015 1016 1017 1018 1019

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1160	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031
1161	1032	1033	1034	1035	1036	1037	1038	2015	2016	2017	2018	2019
1162	2020	2021	2022	3001	3015	3016	3019	3021	3022	3023	3025	3026
1163	3035	3036	3040	3042	3046	3052	3054	3055	3056	3057	3058	3059
1164	3070	3071	3077	3078	3079	3084	3094	3095	3104	3109	3111	
1165	Block 950900:											
1166	1001	1002	1004	1005	1006	1007	1008	1009	1010	1011	1015	1016
1167	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	3002	3005
1168	3006	3007	3009	3010	3011	3012	3013	3014	3015	3016	3017	3018
1169	3019	3020	3021	3022	3023							
1170	VTD DUDLEY											
1171	VTD HAMPTON MILL											
1172	VTD HARVARD											
1173	VTD LCFS #10 (VALAMBROSIA)											
1174	VTD REEDY SPRINGS											
1175	VTD RURAL FIRE STA #17											
1176	County Lowndes GA											
1177	County Monroe GA											
1178	County Pulaski GA											
1179	County Telfair GA											
1180	County Thomas GA											
1181	VTD BARWICK											
1182	VTD BOSTON											
1183	VTD CENTRAL											
1184	VTD COOLIDGE											
1185	VTD ELLABELLE											
1186	VTD FIRE STATION #2											

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1187 Block 960800:  
 1188 5007  
 1189 Block 961000:  
 1190 3006 3008 3018 3022 3024 3025 3033 3042 3043 3044 3045 3046  
 1191 3047 3053 3054  
 1192 VTD GATLIN CREEK  
 1193 Block 961000:  
 1194 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015  
 1195 1016 1017 1018 1019 1020 1021 1022 1023 1026 1027 1028 1031  
 1196 1032 1033 1034 2000 2001 2002 2003 2004 2005 2006 2007 2008  
 1197 2009 2010 2011 2012 2013 2014 2015 2016 2017 2026 2027 2028  
 1198 2029 3000 3001 3002 3003 3004 3005 3007 3010 3011 3015 3028  
 1199 3030 3031 3036 3037 3038 3039 3040 3041  
 1200 Block 961100:  
 1201 2003 2005 2009 2010 2029 2030  
 1202 VTD MERRILLVILLE  
 1203 VTD PATTEN  
 1204 VTD PAVO  
 1205 VTD REMINGTON  
 1206 Block 960502:  
 1207 1025  
 1208 County Tift GA  
 1209 County Turner GA  
 1210 County Twiggs GA  
 1211 County Ware GA  
 1212 County Wheeler GA  
 1213 County Wilcox GA

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1214 County Worth GA  
 1215 District 009  
 1216 County Banks GA  
 1217 County Barrow GA  
 1218 County Butts GA  
 1219 County Clarke GA  
 1220 County Columbia GA  
 1221 VTD DAMASCUS BAPT CHURCH  
 1222 VTD EUBANK/BLANCHARD CTR  
 1223 VTD KIOKEE BAPT CHURCH  
 1224 Block 030403:  
 1225 1000 1002 1003 1004 1005 1006 1007 1008 1009 1010 1019 2004  
 1226 2007 2011 2021  
 1227 Block 030404:  
 1228 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024  
 1229 1025 1026 1027 1028  
 1230 VTD SECOND MT. CARMEL BAPTIST CHURCH  
 1231 County Elbert GA  
 1232 County Franklin GA  
 1233 County Greene GA  
 1234 County Habersham GA  
 1235 VTD HABERSHAM SOUTH  
 1236 Block 000300:  
 1237 1020 1021 1025 1030 1031 1032 1033 1034 1037 1038 1039 1040  
 1238 Block 000400:  
 1239 1000 1001 1002 1003 1004 1005 1008 1009 1010 1011 1012 1013

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1240	1014	1015	1016	1017	1018	1019	1020	1023	1026	1027	2001	2003
1241	2006	2007	2008	2009	2028	2029	2030	2031	2032	2037	2038	2040
1242	2041	2042	2043	2045	2046	2047	2048	2049	2050	2051	2052	2053
1243	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065
1244	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077
1245	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089
1246	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	3000	3001
1247	3002	3003	3004	3005	3006	3007	3010	3011	3013	3014	3016	3017
1248	3018	3021	3022	3025	3026	4016	4017	4018	4020	4021	4022	4023
1249	4024	4025	4026	4027	4028	4030	4031	4032	4033	4034	4035	4036
1250	Block 000501:											
1251	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011
1252	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023
1253	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035
1254	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047
1255	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059
1256	1060	1061	1062	1063	1064	1065	1066	1067	1068	2000	2001	2002
1257	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1258	2015	2016	2017	2020	2022	2027	2028	2029	2030	2031	2032	2033
1259	2034	2035	2036									
1260	Block 000502:											
1261	1008	1012	1013	1014	1015	1018	1023	1027	1028	1029	1030	1034
1262	1035	1036	1037	1038	1039	1040	1041	1042	1045	1046	1047	1048
1263	1049	1050	1051	3067	3068	3069	3070					
1264	Block 000604:											
1265	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014
1266	1018	1030	1031	1032	1033	1034	1035	1036	1049	1058	2000	2001

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1267	2002	2003	2033	3000	3001	3002	3003	3004	3005	3006	3007	3008
1268	3009	3010	3011	3012	3014	3015	3016	3017	3018	3019	3020	3021
1269	3025	3029	3030	3031	3032	4000	4001	4002	4003	4004	4005	4006
1270	4007	4008	4009	4010	4011	4012	4013	4014	4015	4016	4017	4018
1271	4019	4020	4021	4022	4023	4024	4025	4026	4027			
1272	VTD TOWN OF MOUNT AIRY											
1273	County Hall GA											
1274	VTD BARK CAMP											
1275	VTD BIG HICKORY											
1276	VTD CHESTATEE											
1277	VTD CLERMONT											
1278	VTD FORK											
1279	VTD GAINESVILLE I											
1280	VTD GAINESVILLE V											
1281	VTD GILLSVILLE											
1282	VTD GLADE											
1283	Block 000102:											
1284	1008	1009	1010	1011	1012	1013	1016	1017	1018	1038	1039	2000
1285	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
1286	2013	2014	2015	2016	2017	2018	2019	2020	2021	2027	2028	2029
1287	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
1288	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053
1289	2056	2057										
1290	Block 000601:											
1291	3001	3002	3003	3004	3005	3008	3009	3016	3017	3018	3019	3020
1292	3021	3022	3023									
1293	Block 000602:											

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1294	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011
1295	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023
1296	1024	1025	1026	1027	1028	1029	1030	1031	1032	2000	2001	2002
1297	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1298	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
1299	2027	2028	2035	2036	2037	2038	2039	2040	2044	2045	2046	2047
1300	2048	2049	2050	2051	2052	2053	2054	2055	2063	2064	2065	2066
1301	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078
1302	2079	2080	2081	2082	2083	2086	2087	2088	2089	2090		
1303	Block 000703:											
1304	2000	2001	2003	2004								
1305	VTD LULA											
1306	VTD QUILLIANS											
1307	VTD WEST WHELCHER											
1308	VTD WHELCHER											
1309	County Hart GA											
1310	County Jackson GA											
1311	County Jasper GA											
1312	County Lincoln GA											
1313	County Madison GA											
1314	County Morgan GA											
1315	County Oconee GA											
1316	County Oglethorpe GA											
1317	County Stephens GA											
1318	County Taliaferro GA											
1319	County Walton GA											
1320	County Wilkes GA											

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1321 District 010  
1322 County Cobb GA  
1323 VTD Acworth 1A  
1324 VTD Acworth 1B  
1325 VTD Acworth 1C  
1326 VTD Austell 1A  
1327 VTD Baker 01  
1328 VTD Bells Ferry 03  
1329 VTD Big Shanty 01  
1330 VTD Big Shanty 02  
1331 VTD Birney 01  
1332 VTD Birney 02  
1333 VTD Bryant 01  
1334 VTD Bryant 02  
1335 VTD Chalker 01  
1336 VTD Chattahoochee 01  
1337 VTD Cheatham Hill 02  
1338 VTD Cheatham Hill 03  
1339 VTD Clarkdale 01  
1340 VTD Clarkdale 02  
1341 VTD Cooper 01  
1342 VTD Dobbins 01  
1343 VTD Dowell 01  
1344 VTD Durham 01  
1345 VTD East Piedmont 01  
1346 Block 030506:

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1347 1019 2004 2006 3000 3001 3003 3011 3012 3023  
 1348 Block 030604:  
 1349 1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
 1350 2005 2006 2007 2008 2009 2013 2014 3000 3002 3003 3006  
 1351 VTD Elizabeth 01  
 1352 VTD Fair Oaks 02  
 1353 VTD Fair Oaks 04  
 1354 VTD Ford 01  
 1355 VTD Frey 01  
 1356 VTD Harmony-Leland 01  
 1357 VTD Harrison 01  
 1358 VTD Hayes 01  
 1359 VTD Kemp 01  
 1360 VTD Kemp 02  
 1361 VTD Kemp 03  
 1362 VTD Kennesaw 1A  
 1363 VTD Kennesaw 2A  
 1364 VTD Kennesaw 3A  
 1365 VTD Kennesaw 4A  
 1366 VTD Kennesaw 5A  
 1367 VTD Lindley 01  
 1368 VTD Lost Mountain 01  
 1369 VTD Lost Mountain 02  
 1370 VTD Lost Mountain 03  
 1371 VTD Lost Mountain 04  
 1372 VTD Mableton 01  
 1373 VTD Mableton 02

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1374 VTD Mableton 03  
 1375 VTD Mableton 04  
 1376 VTD Macland 01  
 1377 VTD Marietta 1A  
 1378 VTD Marietta 2A  
 1379 VTD Marietta 2B  
 1380 VTD Marietta 3A  
 1381 VTD Marietta 4A  
 1382 VTD Marietta 4B  
 1383 VTD Marietta 4C  
 1384 VTD Marietta 5A  
 1385 Block 030602:  
 1386 4044 4045 4046 4048 4049 4050 4051 4052 4053 4054 4055 4056  
 1387 4057 4058 4059 4062 4063  
 1388 Block 030700:  
 1389 1022 1023 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015  
 1390 2016 2017 2018 2019 2024 2025 2027 3000 3001 3002 3003 3004  
 1391 3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015 3016  
 1392 3017 3018 3019 3020 3021 3022 3023 3024 3025 3026 3027 3028  
 1393 3029 3030 3031 3032 3033 3034 3035 3036 3037 3038 3043 3044  
 1394 3045 3046 3048 3049 3050 3051 3052 3053 4005 4006 4009 4010  
 1395 4011 4012 4013 4014 4015 4016 4017 4018 4019 4020 4021 4022  
 1396 4023 4024 4025 4026 4027 4028 4029 4030 4036  
 1397 Block 030800:  
 1398 3005 3006 3007 3009 3010 3011 3012 3018 3019 3020 3034  
 1399 Block 030912:  
 1400 3000 4000 4001 4002 4003 4004 4005 4007 4008 4011 4012 4013

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1401 4014 4015 4016 4017 4018 4019 4020 4021 4022 4023 4027 4028  
 1402 VTD Marietta 5B  
 1403 VTD Marietta 6A  
 1404 Block 030405:  
 1405 1001 1002 1004 1007 2000 2002 2003 2004 2005 3000 3002 3008  
 1406 3009 3011 3015 4000 4035 5009 5010 5016 5019 5020  
 1407 Block 030407:  
 1408 2000  
 1409 Block 030511:  
 1410 1000 1001 1002 1003 2025 2026  
 1411 VTD Marietta 7A  
 1412 Block 030344:  
 1413 2004 2006 2018  
 1414 Block 030345:  
 1415 1003 1005  
 1416 Block 030405:  
 1417 1003 1008 1009 2006  
 1418 Block 030411:  
 1419 1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
 1420 2006 2007 2008 2009 2011 2012 2013 2014 2015 3000 3001 3002  
 1421 3003 3004  
 1422 Block 030413:  
 1423 1001 2000 2001 2010 3005 3007  
 1424 Block 030414:  
 1425 1000 1001 1002 1003 1004 1006 1017 1018 2000 2001  
 1426 Block 030505:  
 1427 4006 4015 4016 4017 4018 4019 4020 4021 4022 4023 4024

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1428 Block 030800:  
1429 1000 1001 1002 1004 1036 1037  
1430 Block 031001:  
1431 2052 2053 2062  
1432 Block 031113:  
1433 1000 1001 1002 1004 1005 1006 1007 1008 1009 1010 1011  
1434 Block 031114:  
1435 4000  
1436 VTD Mars Hill 01  
1437 VTD Mars Hill 02  
1438 VTD McClure 01  
1439 VTD McEachern  
1440 VTD Nickajack 01  
1441 VTD North Cobb 01  
1442 VTD Norton Park 01  
1443 VTD Oakdale 01  
1444 VTD Oregon 01  
1445 VTD Oregon 02  
1446 VTD Oregon 03  
1447 VTD Oregon 04  
1448 VTD Oregon 05  
1449 VTD Palmer 01  
1450 VTD Pebblebrook 01  
1451 VTD Pine Mountain 01  
1452 VTD Pine Mountain 02  
1453 VTD Pitner 01  
1454 VTD Powder Springs 1A

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1455 VTD Powder Springs 2a  
 1456 VTD Powder Springs 3A  
 1457 VTD Powers Ferry 01  
 1458 Block 030405:  
 1459 2001 3001 3003 3004 3005 3006 3007 3010 3012 3013 3014 5000  
 1460 5001 5002 5003 5004 5005 5006 5007 5008 5011 5012 5021  
 1461 Block 030407:  
 1462 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012  
 1463 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024  
 1464 3000 3001 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011  
 1465 3012 3013 3014 3015  
 1466 Block 030408:  
 1467 2006 2007  
 1468 VTD Riverside 01  
 1469 VTD Smyrna 1A  
 1470 VTD Smyrna 2A  
 1471 VTD Smyrna 3A  
 1472 VTD Smyrna 4A  
 1473 VTD Smyrna 5A  
 1474 VTD Smyrna 6A  
 1475 VTD Smyrna 7A  
 1476 VTD Sweetwater 01  
 1477 VTD Sweetwater 02  
 1478 VTD Terrell Mill 01  
 1479 VTD Vaughan 01  
 1480 VTD Vinings 01  
 1481 VTD Vinings 02

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1482 VTD Vinings 03  
1483 VTD Vinings 04  
1484 VTD Wade Green 02  
1485 County Douglas GA  
1486 VTD ARBOR STATION  
1487 VTD BEULAH BAPTIST CHURCH  
1488 VTD BOUNDARY WATERS  
1489 VTD CHESTNUT LOG  
1490 VTD COLONIAL HILLS  
1491 VTD COUNTY LINE BAPTIST  
1492 VTD DEER LICK  
1493 VTD FACTORY SHOALS  
1494 VTD FIRST BAPTIST DOUGLASVILLE  
1495 VTD FIRST BAPTIST LITHIA SPRINGS  
1496 VTD OLD COURTHOUSE  
1497 VTD TURNER  
1498 County Fulton GA  
1499 VTD CP051  
1500 VTD CP052  
1501 VTD CP053  
1502 VTD CP05B  
1503 VTD CP06A  
1504 VTD CP06B  
1505 VTD CP07B  
1506 VTD CP081  
1507 VTD CP083  
1508 VTD CP084

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1509 VTD CP08A  
 1510 VTD EP04A  
 1511 Block 011307:  
 1512 3000 3001 3002 3003 3004  
 1513 Block 011308:  
 1514 1001 1002 1003 1004 1005 1006 1007 1008 1011 1012  
 1515 VTD EP04B  
 1516 VTD FA01A  
 1517 VTD SC01A  
 1518 VTD SC01B  
 1519 VTD SC01C  
 1520 VTD SC01D  
 1521 VTD SC02  
 1522 VTD SC05A  
 1523 VTD SC05B  
 1524 VTD SC05D  
 1525 VTD SC05E  
 1526 VTD SC07A  
 1527 Block 010308:  
 1528 2018 2021 2022 2027  
 1529 Block 010315:  
 1530 2021  
 1531 Block 010519:  
 1532 2003 2009  
 1533 Block 010520:  
 1534 1000 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012  
 1535 1013 1014 1015 1016 1017 1018 1019 1021 1022 1023 2008 2015

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1536 2016 3000  
 1537 Block 010526:  
 1538 2000 2002 2013 2014 3001 4001 4002 4003 4004 4005 4008 4012  
 1539 4013 4014 4015  
 1540 Block 010527:  
 1541 1002  
 1542 Block 010535:  
 1543 1000 1002 1006 1008 1009 2000 2006 2009 2022 2023  
 1544 Block 010536:  
 1545 1000 1001 1003 1004 1005 1006 1007 1009 1010 1012 1013 1014  
 1546 1018 1022 2001 2003 2004 2005 2007 2009 2010 2011 2012 2013  
 1547 2014 2015 2016 2017  
 1548 VTD SC07B  
 1549 VTD SC08A  
 1550 VTD SC08B  
 1551 VTD SC08C  
 1552 VTD SC08D  
 1553 VTD SC08E  
 1554 VTD SC08F  
 1555 VTD SC08G  
 1556 VTD SC08H  
 1557 VTD SC09A  
 1558 VTD SC09B  
 1559 VTD SC10  
 1560 VTD SC13  
 1561 VTD SC14A  
 1562 VTD SC14B

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1563 VTD SC15  
1564 VTD SC16A  
1565 VTD SC16B  
1566 VTD SC17A  
1567 VTD SC17B  
1568 VTD SC17C  
1569 VTD SC18A  
1570 VTD SC18B  
1571 VTD SC18C  
1572 VTD SC19A  
1573 VTD SC19B  
1574 VTD SC20  
1575 VTD SC29B  
1576 VTD SC30A  
1577 VTD UC01A  
1578 VTD UC01B  
1579 VTD UC01C  
1580 VTD UC01D  
1581 VTD UC01E  
1582 VTD UC02A  
1583 VTD UC02B  
1584 VTD UC033

1585 District 011  
1586 County Bartow GA  
1587 County Cherokee GA  
1588 County Forsyth GA

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1589 County Hall GA  
 1590 VTD CANDLER  
 1591 VTD CHICOPEE  
 1592 VTD FLOWERY BRANCH I  
 1593 VTD FLOWERY BRANCH II  
 1594 VTD FRIENDSHIP I  
 1595 VTD FRIENDSHIP II  
 1596 VTD FRIENDSHIP III  
 1597 VTD FRIENDSHIP IV  
 1598 VTD GAINESVILLE II  
 1599 VTD GAINESVILLE III  
 1600 VTD GAINESVILLE IV  
 1601 VTD GLADE  
 1602 Block 000602:  
 1603 2084 2085  
 1604 Block 000703:  
 1605 2005 2015  
 1606 Block 000800:  
 1607 1000 1001 1002 1003 1004 1007 1012 1018 1032 2000 2001 2008  
 1608 2016 2017 2018 2019 2020  
 1609 VTD MORGAN I  
 1610 VTD MORGAN II  
 1611 VTD OAKWOOD I  
 1612 VTD OAKWOOD II  
 1613 VTD ROBERTS  
 1614 VTD TADMORE  
 1615 VTD WILSON

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1616 District 012  
 1617 County Baldwin GA  
 1618 County Bulloch GA  
 1619 County Burke GA  
 1620 County Candler GA  
 1621 VTD METTER  
 1622 Block 950100:  
 1623 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1624 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023  
 1625 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035  
 1626 1036 1037 1038 1039 1040 1041 1042 1043 1044 1045 1046 1047  
 1627 1048 1049 1050 1051 1052 1053 1054 1055 1056 1057 1058 1059  
 1628 1060 1061 1062 1063 1064 1065 1066 1067 1068 1069 1070 1071  
 1629 1072 1073 1074 1075 1076 1077 1078 1079 1080 1081 1082 1083  
 1630 2000 2001 2002 2003 2004 2005 2006 2007 2014 2015 2016 3000  
 1631 3001 3002 3003 3004 3005 3006 4000 4001 4002 4003 4004 4005  
 1632 4006 4007 4008 4009 4010 4011 4012 4013 4014 4015 4016 4017  
 1633 4018 4019 4020 4021 4022 4023 4024 4025 4026 4027 4028 4029  
 1634 4030 4031 4032 4033 4036 4039 4040 4041 4042  
 1635 Block 950200:  
 1636 1024 1085 2000 3012  
 1637 Block 950300:  
 1638 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1639 1012 1013 1014 1015 1016 1017 1018 1025  
 1640 County Columbia GA  
 1641 VTD ABILENE BAPTIST

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1642 VTD AUGUSTA CHRISTIAN  
 1643 VTD BELAIR BAPTIST CHURCH  
 1644 VTD BESSIE THOMAS CENTER  
 1645 VTD BLANCHARD PARK  
 1646 VTD BLUERIDGE ELEMENTARY  
 1647 VTD CHRIST CHURCH, PRESBYTERIAN  
 1648 VTD CHRIST SANCTIFIED  
 1649 VTD CHRIST THE KING CH  
 1650 VTD CHURCH OF OUR SAVIOR  
 1651 VTD COL CTY BOARD OF EDU  
 1652 VTD COL CTY MAIN LIBRARY  
 1653 VTD G A APOSTOLIC CHURCH  
 1654 VTD GENESIS CHURCH  
 1655 VTD GOLD CROSS EMS  
 1656 VTD GOSPEL WATER BRANCH  
 1657 VTD GRACE BAPTIST CHURCH  
 1658 VTD GREENBRIER HIGH  
 1659 VTD GROVETOWN METHODIST  
 1660 VTD GROVETOWN MIDDLE SCH  
 1661 VTD HARLEM BRANCH LIBRARY  
 1662 VTD JOURNEY COMM. CHURCH  
 1663 VTD KIOKEE BAPT CHURCH  
 1664 Block 030403:  
 1665 1001 1011 1012 1013 1014 1015 1016 1017 1018 1020 1021 1022  
 1666 1023 1024 1025 1026 2005 2009 2010 2013 2014 2015 2016 2017  
 1667 VTD LAKESIDE MIDDLE  
 1668 VTD LEWIS METHODIST

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1669 VTD LIBERTY PARK  
1670 VTD MARTINEZ BAPTIST  
1671 VTD MARVIN METHODIST  
1672 VTD MTZ COL FIRE DEPT #4  
1673 VTD MTZ COL FIRE HDQTR.  
1674 VTD NEW LIFE CHURCH  
1675 VTD PATRIOTS PARK  
1676 VTD PHILADELPHIA CHURCH  
1677 VTD REDEEMER CHURCH  
1678 VTD RIVERSIDE ELEMENTARY  
1679 VTD STEVENS CREEK CHURCH  
1680 VTD STEVENS CREEK ELEM  
1681 VTD TRINITY BAPT CHURCH  
1682 VTD WARREN BAPTIST CHURCH-GROVETOWN  
1683 VTD WESLEY METHODIST  
1684 VTD WEST ACRES BAPTIST  
1685 VTD WESTSIDE BAPT CHURCH  
1686 VTD WOODLAWN BAPT CHURCH  
1687 County Effingham GA  
1688 County Emanuel GA  
1689 County Glascock GA  
1690 County Hancock GA  
1691 County Jefferson GA  
1692 County Jenkins GA  
1693 County Johnson GA  
1694 County Laurens GA  
1695 VTD BREWTON

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1696 VTD BUCKEYE  
 1697 VTD CALHOUN PARK  
 1698 Block 950201:  
 1699 3012 3013 3022 3023 3024 3025  
 1700 Block 950300:  
 1701 1021 1022 1023 1024 1025 1026 1032 1033 1034 1035 1036 1037  
 1702 1038 1039 1040 1041 1042 1043 1044 1045 1046 1047 2000 2001  
 1703 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013  
 1704 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025  
 1705 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037  
 1706 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049  
 1707 2050  
 1708 Block 950400:  
 1709 1018 1019 1020 3000 3001 3002 3003 3004 3005 3006 3007 3008  
 1710 3009 3010 3011 3012 3013 3014 3015 3016 3017 3018 3019 4000  
 1711 4001 4002 4003 4004 4005 4006 4007 4008 4009 4010 4011 4012  
 1712 4013 4014 4015 4016 4027 4028 4029 4030 4031 4032 4033 4034  
 1713 Block 950500:  
 1714 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1715 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023  
 1716 1024 1025 1026 1027 1028 1030 1031 1032 2015 2016 2017 2018  
 1717 2019 2020 2029 2030 2031 2032 2033 2042  
 1718 Block 950800:  
 1719 1000 1001 1002 1003 1004 1005 1008 1013 2000 2001 2002 2003  
 1720 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2023  
 1721 2024 2025 2026  
 1722 Block 950900:

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1723	1000	1003	1012	1013	1014	2000	2001	2002	2003	2004	2005	2006
1724	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
1725	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1726	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
1727	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	3000
1728	3001	3003	3004	3008								
1729	VTD FBC - FLC											
1730	VTD FIRE DEPT STA #5											
1731	VTD MINTER											
1732	VTD SMITH											
1733	VTD WT ADAMS FIRE STA #18											
1734	County McDuffie GA											
1735	County Putnam GA											
1736	County Richmond GA											
1737	County Screven GA											
1738	County Warren GA											
1739	County Washington GA											
1740	County Wilkinson GA											
1741	District 013											
1742	County Clayton GA											
1743	VTD ELLENWOOD											
1744	VTD FOREST PARK 1											
1745	VTD FOREST PARK 2											
1746	VTD FOREST PARK 3											
1747	VTD FOREST PARK 4											
1748	VTD FOREST PARK 5											

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1749 VTD FOREST PARK 6  
1750 VTD JONESBORO 1  
1751 VTD JONESBORO 10  
1752 VTD JONESBORO 11  
1753 VTD JONESBORO 12  
1754 VTD JONESBORO 13  
1755 VTD JONESBORO 14  
1756 VTD JONESBORO 15  
1757 VTD JONESBORO 16  
1758 VTD JONESBORO 17  
1759 VTD JONESBORO 18  
1760 VTD JONESBORO 2  
1761 VTD JONESBORO 3  
1762 VTD JONESBORO 4  
1763 VTD JONESBORO 5  
1764 VTD JONESBORO 6  
1765 VTD JONESBORO 7  
1766 VTD JONESBORO 8  
1767 VTD JONESBORO 9  
1768 VTD LAKE CITY  
1769 VTD LOVEJOY 1  
1770 VTD LOVEJOY 2  
1771 VTD LOVEJOY 3  
1772 VTD LOVEJOY 4  
1773 VTD LOVEJOY 5  
1774 VTD MORROW 1  
1775 VTD MORROW 2

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1776 VTD MORROW 3  
1777 VTD MORROW 4  
1778 VTD MORROW 5  
1779 VTD MORROW 6  
1780 VTD MORROW 7  
1781 VTD MORROW 8  
1782 VTD MORROW 9  
1783 VTD OAK 2  
1784 VTD OAK 3  
1785 VTD OAK 4  
1786 VTD PANHANDLE 1  
1787 VTD PANHANDLE 2  
1788 VTD RIVERDALE 1  
1789 VTD RIVERDALE 10  
1790 VTD RIVERDALE 11  
1791 VTD RIVERDALE 12  
1792 VTD RIVERDALE 2  
1793 VTD RIVERDALE 3  
1794 VTD RIVERDALE 4  
1795 VTD RIVERDALE 5  
1796 VTD RIVERDALE 6  
1797 VTD RIVERDALE 7  
1798 VTD RIVERDALE 8  
1799 VTD RIVERDALE 9  
1800 County Douglas GA  
1801 VTD BRIGHT STAR  
1802 VTD CHAPEL HILL

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1803 VTD CHURCH AT CHAPEL HILL  
 1804 VTD DAY STAR GYM  
 1805 VTD DORSETT SHOALS  
 1806 VTD EPHESUS BAPTIST CHUR  
 1807 VTD GOLDEN METHODIST CH  
 1808 VTD LUTHERAN CHURCH - GS  
 1809 VTD MIRROR LAKE ELEMENTA  
 1810 VTD PRAYS MILL GYM  
 1811 VTD ST JULIANS EPISCOPAL  
 1812 VTD STEWART  
 1813 VTD WINSTON  
 1814 County Fayette GA  
 1815 VTD ANTIOCH  
 1816 VTD BANKS  
 1817 VTD BLACKROCK  
 1818 VTD BROOKS  
 1819 Block 140501:  
 1820 1014 1018 1019 1020 4019 4020 4021  
 1821 Block 140502:  
 1822 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1012  
 1823 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024  
 1824 1025 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037  
 1825 1038 1039 1040 1041 1042 1043 1044 1045 1060 1061 1062 2000  
 1826 2001 2002 2003 2004 2005 2006 2007 2008 2009 2012 2013 2014  
 1827 2015 2016 2017 2018 2019 2020 2025 2026 2027 2028 2029 2030  
 1828 2031 2032 2033 2034  
 1829 VTD DOGWOOD

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1830 VTD EUROPE  
1831 VTD FAYETTEVILLE EAST  
1832 VTD FAYETTEVILLE WEST  
1833 VTD FLINT  
1834 VTD HARPS CROSSING  
1835 VTD HOPEFUL  
1836 VTD JEFF DAVIS  
1837 VTD KENWOOD  
1838 VTD MORNING CREEK  
1839 VTD MURPHY  
1840 VTD OAK RIDGE  
1841 VTD RAREOVER  
1842 VTD SANDY CREEK  
1843 VTD SHAKERAG EAST  
1844 VTD SPRING HILL  
1845 VTD STARRSMILL  
1846 VTD WHITEWATER  
1847 VTD WILLOW POND  
1848 VTD WOOLSEY  
1849 County Fulton GA  
1850 VTD CH01  
1851 VTD CH02  
1852 VTD CH03  
1853 VTD CH04A  
1854 VTD CH04B  
1855 VTD CH05  
1856 VTD FA01B

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1857 VTD FA01C  
 1858 VTD PA01  
 1859 VTD SC04  
 1860 VTD SC07A  
 1861 Block 010401:  
 1862 1000 1004 1005 1026 1028 1037 1038 2007  
 1863 Block 010402:  
 1864 2020 2036 2038 2041 2042 2043 2050 2051 2052 2059 2070  
 1865 Block 010519:  
 1866 1016 1017  
 1867 Block 010520:  
 1868 2000 2001 2002 2003 2004 2005 2006 2007 2009 2010 2011 2012  
 1869 2013 2014 2017 2018 2019 2020 3006 3007 3009 3012 3013 3014  
 1870 3015 3020 3022 3023 3024 3028 3030 3031 3034 3035 3040 3046  
 1871 3048 3049 3051 3052 3054  
 1872 VTD SC07C  
 1873 VTD SC09C  
 1874 VTD SC11A  
 1875 VTD SC11B  
 1876 VTD SC211  
 1877 VTD SC212  
 1878 VTD SC21A  
 1879 VTD SC23A  
 1880 VTD SC23B  
 1881 VTD SC23C  
 1882 VTD SC27  
 1883 VTD SC29A

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1884 VTD UC031  
 1885 VTD UC032  
 1886 VTD UC035  
 1887 County Henry GA  
 1888 VTD AUSTIN ROAD  
 1889 VTD COTTON INDIAN  
 1890 VTD DUTCHTOWN  
 1891 VTD ELLENWOOD  
 1892 VTD FLIPPEN  
 1893 VTD GROVE PARK  
 1894 VTD HICKORY FLAT  
 1895 VTD LAKE HAVEN  
 1896 VTD LIGHTHOUSE  
 1897 VTD LOCUST GROVE  
 1898 VTD LOWES  
 1899 VTD MCDONOUGH CENTRAL  
 1900 Block 070307:  
 1901 1005 1015 1016 1017 1018 1019 1020 1023 1024 1025 1026 1027  
 1902 1028 1029 1030 1031 1032 1033 1034 1035 1036 1040 1041 1042  
 1903 1043 2007 2011 2012 2015 2016 3004 3011 3012 3014  
 1904 Block 070310:  
 1905 2005 2006 2007 2008 2009 2010 2011 2013 2014 2017 2020 2021  
 1906 2022 2023 2024 2025 2026 2027 2032 2041 2042 2043 2044 2045  
 1907 2046 2048  
 1908 Block 070317:  
 1909 1000 1001 1023 1024 1025  
 1910 Block 070325:

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1911	1020 1021 1040 1041 1042 1043 1048 1049 1050 1051 1052 1053
1912	1054 1055 1056 1057 1058 1059 1060 1061 1062 1063 1064 1065
1913	VTD MOUNT CARMEL
1914	VTD NORTH HAMPTON
1915	VTD OAKLAND
1916	VTD PATES CREEK
1917	VTD RED OAK
1918	VTD SHAKERAG
1919	VTD SHILOH
1920	VTD SOUTH HAMPTON
1921	VTD STAGECOACH
1922	VTD STOCKBRIDGE CENTRAL
1923	VTD STOCKBRIDGE EAST-WEST
1924	VTD SWAN LAKE
1925	VTD UNITY GROVE
1926	VTD WESLEY LAKES
1927	VTD WESTSIDE
1928	County Spalding GA
1929	District 014
1930	County Catoosa GA
1931	County Chattooga GA
1932	County Dade GA
1933	County Dawson GA
1934	County Fannin GA
1935	County Floyd GA
1936	County Gilmer GA

H. B. 5EX

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1937 County Gordon GA  
 1938 County Habersham GA  
 1939 VTD AMYS CREEK  
 1940 VTD CITY OF BALDWIN  
 1941 VTD DEMOREST  
 1942 VTD HABERSHAM NORTH  
 1943 VTD HABERSHAM SOUTH  
 1944 Block 000502:  
 1945 1022 1031 1032 1033 3050 3051 3052 3053 3054 3064 3065 3066  
 1946 Block 000603:  
 1947 2023 2024 2028 2029 2030 2031 2032 2034 2035 2037 2041  
 1948 Block 000604:  
 1949 1000 1001 1002 1015 1016 1017 1019 1020 1021 1022 1023 1024  
 1950 1025 1026 1027 1028 1029 1037 1038 1039 1040 1041 1043 1044  
 1951 1046 1047 1048 1050 1051 1052 1053 1054 1055 2004 2005 2006  
 1952 2007 2008 2010 2011 2012 2014 2021 2022 2023 2024 2025 2026  
 1953 2030 2034 2041 2049 3013 3028  
 1954 VTD MUD CREEK  
 1955 County Lumpkin GA  
 1956 County Murray GA  
 1957 County Pickens GA  
 1958 County Polk GA  
 1959 VTD ARAGON  
 1960 VTD CEDARTOWN  
 1961 Block 010201:  
 1962 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
 1963 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

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1964	1024	1025	1026	1027	1028	1029	1030	2000	2001	2002	2003	2004
1965	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
1966	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
1967	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
1968	2041	2042	2043	3000	3001	3002	3003	3004	3005	3006	3007	3008
1969	3009	3010	3011	3012	3013	3014	3015	3016	3017	3018	3019	3020
1970	3021	3022	3023	3024	3025	3026	3027	3028	3029	3030	3031	3032
1971	3033	3034	3035	3036								
1972	Block 010202:											
1973	1030	1033	1034	1035	1036	1037	1038	1046	1055	1056	1061	1062
1974	2015	2016	2017	2036	2037	2038	2039	2040	2041	2042	2043	2044
1975	2047	2050										
1976	Block 010300:											
1977	2000	2001	2002	2003	2004	2005	2006	2007	2013	2014	3000	3001
1978	3002	3012	3013	3014	3015	3017	3018	3019	3020	3021	3022	3023
1979	3024	3025	3026	3027	3028	3029	3030	3031	3032	3033	3034	3035
1980	3036	3037	3038	3039	3040	3041	3042	3044				
1981	Block 010400:											
1982	3000	3001	3002	3003	3004	3005	3006	3007	3008	3009	3010	3011
1983	3012	3013	3014	3015	3016	3017	3018	3019	3020	3021	3022	3023
1984	3024	3025	3026	3027	3032	4000	4003	4004	4005	4006	4007	4008
1985	4009	4013	4022	5000	5001	5002	5003	5004	5005	5006	5007	5008
1986	5009	5010	5011	5012	5013	5014	5015	5016	5017	5018	5019	5020
1987	5021	5022	5023	5024	5025	5026	5027					
1988	Block 010500:											
1989	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
1990	2036	2037	2038	2039	2040	2041	2042	2043	2044	3000	3001	3002

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LC 47 1149

1991	3003	3004	3005	3006	3007	3008	3009	3010	3011	3012	3013	3014
1992	3015	3016	3017	3018	3019	3020	3021	3022	3023	3024	3025	3026
1993	3027	3028	3029	3030	3031	4000	4001	4002	4003	4004	4005	4006
1994	4007	4008	4009	4010	4011	4012	4013	4014	4015	4016	4017	4018
1995	4019	4020	4021	4022	4023	4024	4025	4026	4027	4028	4029	4030
1996	4031	4032	4033	4034	4035	4036	4037	5000	5001	5002	5003	5004
1997	5005	5006	5007	5008	5009	5010	5011	5012	5013	5014	5015	5016
1998	5017	5018	6000	6001	6002	6003	6004	6005	6006	6007	6008	6009
1999	6010	6011	6012	6013	6014	6015	6016	6017	6018	6019	6021	6022
2000	6023	6024	6025	6026	6027	6029	6030	6043				
2001	VTD LAKE CREEK											
2002	County Rabun GA											
2003	County Towns GA											
2004	County Union GA											
2005	County Walker GA											
2006	County White GA											
2007	County Whitfield GA											

H. B. SEX

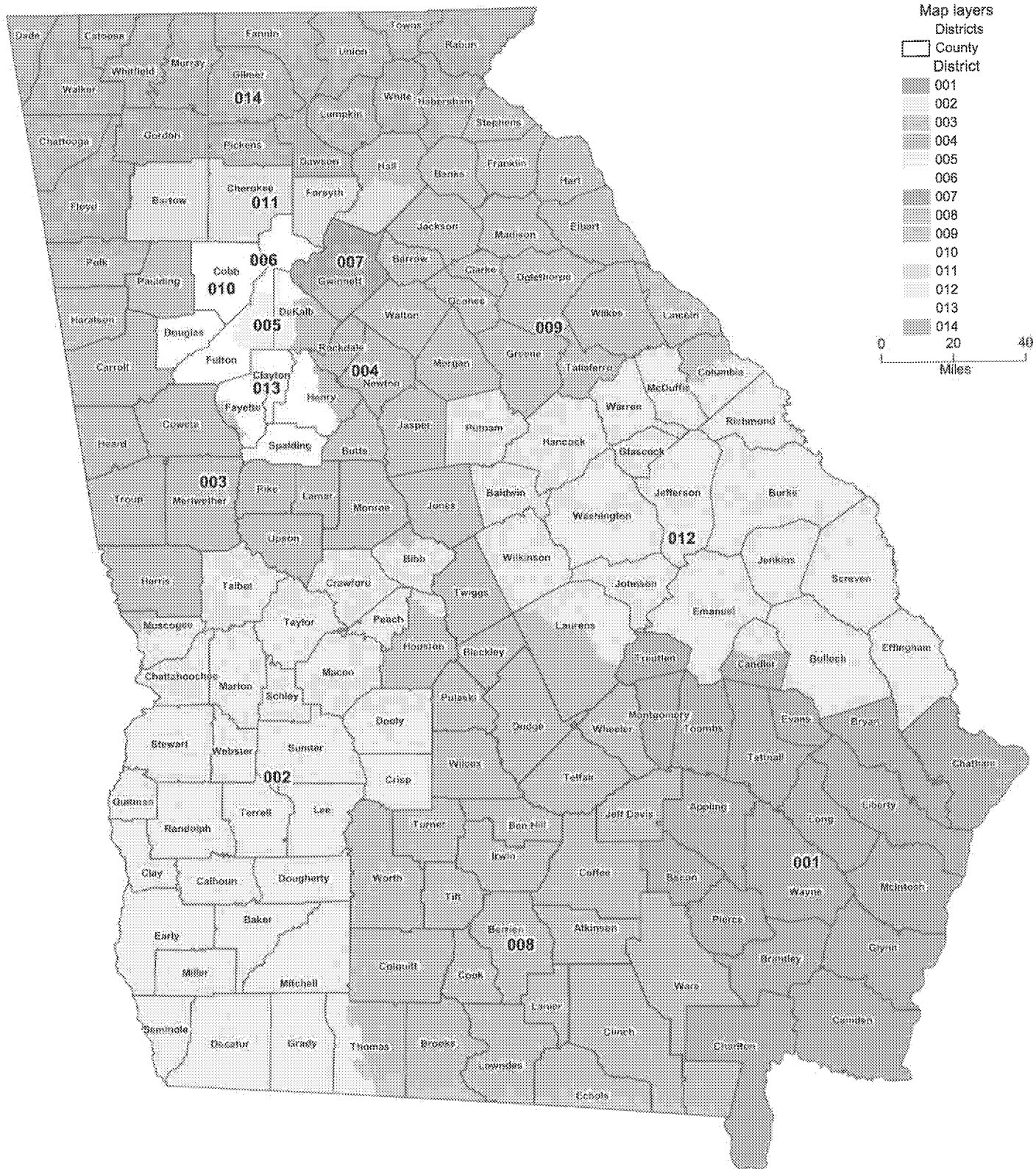
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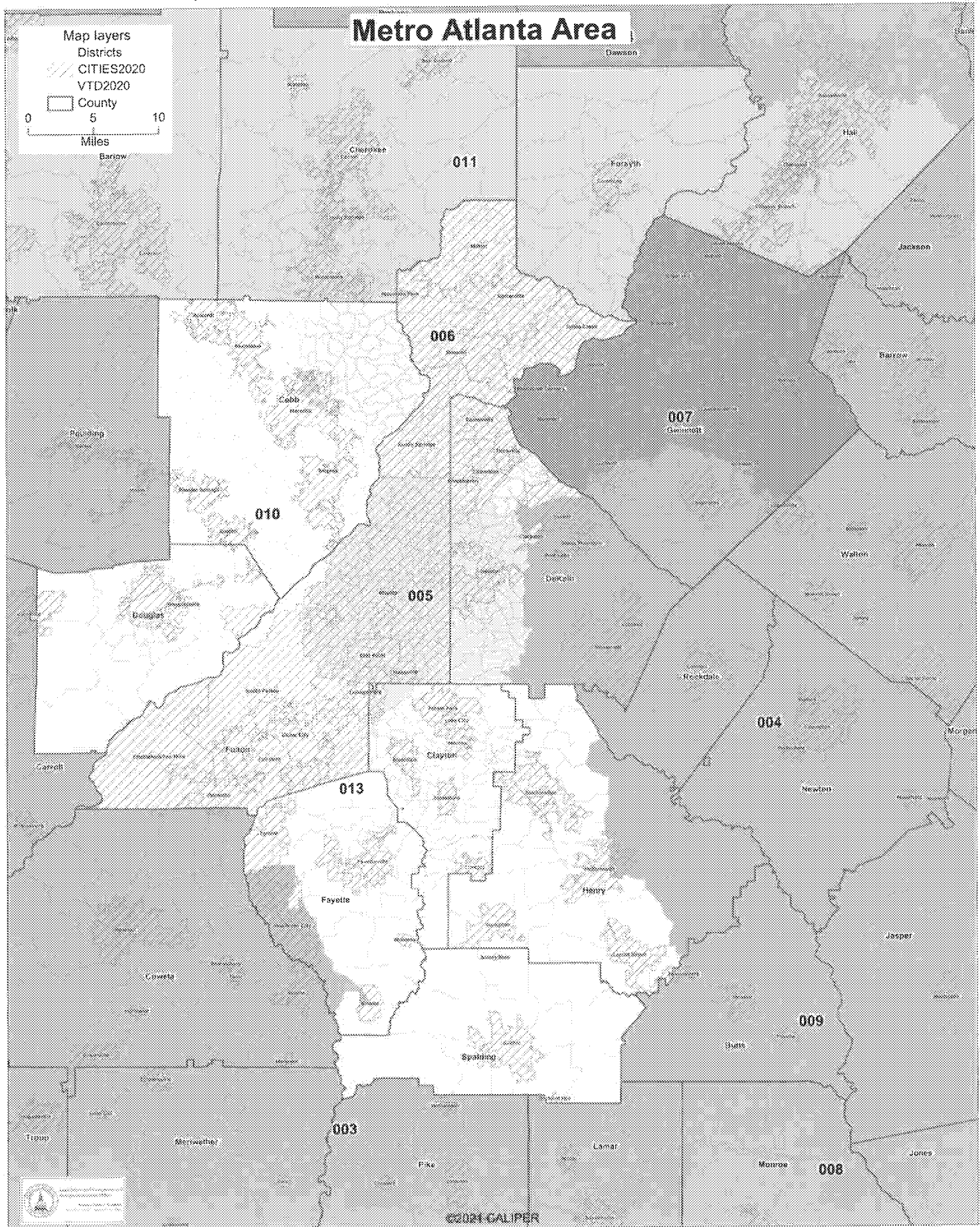
PUBLIC

# Proposed Georgia Congressional Districts

client: HD143  
type: Congress  
plan: GHDC-GSDC-CongPlan1



# Proposed Georgia Congressional Districts



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:23 AM

**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_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	590,786	77.21%	56.59%	28.29%	8.28%	2.13%	0.23%	0.15%	0.42%	3.9%
002	765,135	-1	0.00%	587,666	76.81%	39.33%	49.92%	5.84%	1.24%	0.2%	0.09%	0.34%	3.05%
003	765,137	1	0.00%	581,128	75.95%	67.53%	19.58%	6.22%	1.92%	0.22%	0.05%	0.46%	4.02%
004	765,136	0	0.00%	579,213	75.7%	24.78%	58.52%	7.8%	4.46%	0.18%	0.04%	0.67%	3.56%
005	765,137	1	0.00%	623,102	81.44%	36.44%	47.63%	6.69%	4.87%	0.16%	0.03%	0.54%	3.64%
006	765,137	1	0.00%	588,726	76.94%	56.04%	12.14%	14%	12.77%	0.13%	0.04%	0.77%	4.12%
007	765,135	-1	0.00%	567,115	74.12%	32.17%	23.82%	25.63%	14.13%	0.15%	0.04%	0.65%	3.41%
008	765,136	0	0.00%	583,936	76.32%	59.13%	28.34%	7.34%	1.51%	0.2%	0.05%	0.31%	3.13%
009	765,137	1	0.00%	594,668	77.72%	70.26%	15.06%	8.18%	2.22%	0.19%	0.03%	0.47%	3.6%
010	765,137	1	0.00%	590,424	77.17%	35.53%	41.44%	14.45%	3.49%	0.18%	0.05%	0.86%	4%
011	765,137	1	0.00%	570,405	74.55%	66.31%	6.64%	15.25%	7.22%	0.19%	0.04%	0.49%	3.86%
012	765,136	0	0.00%	589,460	77.04%	52.15%	36.34%	5.1%	1.93%	0.22%	0.11%	0.38%	3.77%
013	765,135	-1	0.00%	575,033	75.15%	25.7%	56.41%	10.3%	3.38%	0.19%	0.04%	0.66%	3.31%
014	765,136	0	0.00%	598,612	78.24%	78.85%	4.31%	11.74%	0.91%	0.24%	0.03%	0.28%	3.64%

**Total: 10,711,908****Ideal District: 765,136**



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:25 AM

**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+_Whi]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,137	1	0.00%	590,786	77.21%	59.51%	27.16%	7.2%	2.3%	0.24%	0.14%	0.36%	3.1%
002	765,135	-1	0.00%	587,666	76.81%	42.21%	48.38%	5.03%	1.31%	0.22%	0.09%	0.27%	2.49%
003	765,137	1	0.00%	581,128	75.95%	69.81%	19.11%	5.3%	1.92%	0.22%	0.06%	0.37%	3.22%
004	765,136	0	0.00%	579,213	75.7%	27.14%	57.92%	6.72%	4.33%	0.18%	0.04%	0.6%	3.07%
005	765,137	1	0.00%	623,102	81.44%	38.63%	46.2%	6.14%	5.17%	0.16%	0.04%	0.49%	3.17%
006	765,137	1	0.00%	588,726	76.94%	58.57%	12.48%	12.32%	12.44%	0.12%	0.04%	0.69%	3.35%
007	765,135	-1	0.00%	567,115	74.12%	34.96%	23.37%	23.1%	15.07%	0.15%	0.04%	0.54%	2.76%
008	765,136	0	0.00%	583,936	76.32%	61.62%	27.63%	6.23%	1.56%	0.21%	0.05%	0.24%	2.46%
009	765,137	1	0.00%	594,668	77.72%	72.75%	14.61%	6.83%	2.25%	0.2%	0.03%	0.4%	2.93%
010	765,137	1	0.00%	590,424	77.17%	38.71%	40.7%	12.5%	3.66%	0.19%	0.05%	0.8%	3.4%
011	765,137	1	0.00%	570,405	74.55%	70.01%	6.6%	13.09%	6.49%	0.18%	0.04%	0.42%	3.16%
012	765,136	0	0.00%	589,460	77.04%	54.64%	35.25%	4.45%	2.04%	0.23%	0.1%	0.32%	2.97%
013	765,135	-1	0.00%	575,033	75.15%	28.57%	55.4%	8.86%	3.57%	0.2%	0.04%	0.59%	2.76%
014	765,136	0	0.00%	598,612	78.24%	81.74%	4.22%	9.46%	0.92%	0.25%	0.03%	0.23%	3.14%

**Total: 10,711,908****Ideal District: 765,136**

NOT  
PUBLIC

# House Legislative and Congressional Reapportionment Committee

Saturday, November 20, 2021

9:00 AM, 406 CLOB

Speaker #	First and Last Name	Organization (If Any)	Email	Address	County of Residence	Phone number
X 1	Alex Ames	None	alie316389@gmail.com	10745 Carrara Cove Alpharetta GA 30022	Fulton	6788978934
X 2	Mira Sydow		sydowmira@gmail.com	11014 Taconic Way	Fulton	4702979061
X 3	<del>Katy Gates</del>		<del>katygates03@gmail.com</del>	<del>1530 Montcliff Drive Cumming GA</del>	<del>Forsyth</del>	<del>6789430093</del>
✓ 4	Lisa Campbell		campbell.lisa.gayle@gmail.com	3034 Fairhaven Ridge NW	Cobb	7703153088
X 5	Phylis Preston		phylpreston@gmail.com	3150 Woodwalk Dr. SE, Atlanta, GA	Cobb	H(678)653-9492 ; C(404)630-7774
✓ 6	Anthony Whaley	None	tony@whaleynet.com	1186 Hillside Green Way, Powder Springs, GA 30227	Cobb	678 525 9985
✓ 7	DeBorah Johnson	FACES INC.	Dyjohnson1968@gmail.com	6213 Pine Bluff Court SW	Cobb	404 396-8032
X 8	Carolina Mock		cretesmock@comcast.net	3235 Kittiwake Circle	Gwinnett	404-925-5381
✓ 9	Juliette Hartel		Juliette@popk.in	11055 Glenbarr Dr, Johns Creek	Fulton	917-453-0700
✓ 10	Harold Kirtz	Jewish Community Relations Council of Metro Atlanta	hkirtz@hotmail.com	8150 Innsbruck Drive, Sandy Springs	Fulton	770-789-9378
✓ 11	Karen McCown	Fair Districts GA	karen@karenmccown.com	429 Chelsea Circle, Atlanta, GA 30307	Dekalb	16787784477
✓ 12	Andrea Espinoza	GLAHR Action Network	actionnet.glahr@gmail.com	4015 Morning Star Avenue Powder Springs GA 30127	Georgia	6784638258
* 13	Scotty Crowe	SURJ Atlanta	scottycrowe@me.com	891 white st. SW	Fulton	4045851750
* 14	Mike Levin		levin74@yahoo.com	3143 Arborwoods Drive	Fulton	7709937779
* 15	James sams		sams_claudette79@yahoo.com	49 Taylorsville Road	Floyd	7065120514

✓ 16	Arwin Hasan	Georgia Youth Justice Coalition	rwin2151@gmail.com	7925 Chancery Ridge Duluth, GA 30097	Forsyth County	7704018965
✓ 17	Julian Fortuna	Georgia Youth Justice Coalition but primarily - a college student	julian.fortuna@gmail.com	1055 S Lumpkin St, Athens, GA 30609	Athens-Clark	14048599437
✓ 18	Lola Russell	Pastor, Pleasant Hill Victory African Methodist Episcopal Church	lola.russell@gmail.com	3712 Grahams Port Lane	Gwinnett	6784713253
✓ 19	Abigail Lane		vschickie@yahoo.com	2683 Fleur de Lis Pl	DeKalb	6786427170
✓ 20	Donna court	None	dcourt.rn@gmail.com	3074 Gant Quarters Circle	Cobb	404-375-2099
✓ 21	Ralph O'Connor		Ralph390@comcast.net	390 17th St, NW, # 5069, Atlanta 30363	Fulton	4042421234
✓ 22	James Burge		jamesburge2@gmail.com	190 Kirkwood Rd Atlanta GA 30317	DeKalb	4045476461
✓ 23	Anna Hall		annahall4363@gmail.com	1099 Boulevard SE	Fulton	6782627409
✓ 24	Terre Spencer		terrespencer@me.com	6000 Bama Court	Gwinnett	7705971367
✓ 25	Sandra Phillips		sandra_phillips2001@yahoo.com	340 Stoneview Pl SW Atlanta Ga 30331	Fulton GA	4043440797
✓ 26	Mehar Nemani	YGJ	mehar.nemani@gmail.com	125 Kilrain Court	Fulton	4047133554
27	Joanne Bonnett		bonnettj@bellsouth.net	655 Jacksons Mill Way, Lilburn, GA 30047	Gwinnett	7709230951
28	Heidi McIntyre					
29	Lisa spital					



# EXHIBIT 5

You are viewing a page from the 2021 Special Session. **This is not the current session.**

# SB 2EX

"Georgia Congressional Redistricting Act"; enact

Current Version   Past Versions

## Sponsors

No.	Name	District
1.	<a href="#">Kennedy, John</a>	18th
2.	<a href="#">Cowser, Bill</a>	46th
3.	<a href="#">Dugan, Mike</a>	30th
4.	<a href="#">Gooch, Steve</a>	51st
5.	<a href="#">Burke, Dean</a>	11th
6.	<a href="#">Walker, III, Larry</a>	20th
7.	<a href="#">Miller, Butch</a>	49th

## Committees

House Committee:  
[Legislative & Congressional Reapportionment](#)  
Senate Committee:  
[Reapportionment and Redistricting](#)

## First Reader Summary

A BILL to be entitled an Act to provide for the composition and number of congressional districts; to provide for a short title; to provide when such representatives shall take office; to provide for continuation of present congressional districts until a certain time; to provide for related matters; to provide an effective date; to repeal a specific Act; to repeal conflicting laws; and for other purposes.

## Status History

Date	Status
12/30/2021	Effective Date
12/30/2021	Act 8EX
12/30/2021	Senate Date Signed by Governor
11/30/2021	Senate Sent to Governor
11/22/2021	House Passed/Adopted
11/22/2021	House Third Readers
11/20/2021	House Committee Favorably Reported
11/20/2021	House Second Readers
11/19/2021	House First Readers
11/19/2021	Senate Passed/Adopted By Substitute
11/19/2021	Senate Third Read

Date	Status
11/18/2021	Senate Read Second Time
11/18/2021	Senate Committee Favorably Reported By Substitute
11/03/2021	Senate Read and Referred
11/02/2021	Senate Hopper

Footnotes

11/18/2021 Notice of intent to file Minority Report; 11/19/2021 Minority Report Filed; 11/22/2021 Structured Rule

Votes

Date	Vote No.	Yea	Nay	NV	Exc
11/19/2021	<a href="#">Senate Vote #23</a>	32	21	0	3
11/22/2021	<a href="#">House Vote #22</a>	96	68	4	12

Helpful Links

- [Georgia.gov](#)
- [Governor's Office](#)
- [Secretary of State](#)
- [Georgia Department of Motor Vehicles](#)
- [Georgia Department of Driver Services](#)
- [Georgia Department of Revenue](#)
- [Georgia Department of Labor](#)

Legislative Resources

- [House of Representatives](#)
- [Senate](#)
- [Open RFP's](#)
- [Senate Staffing](#)
- [Intern Program](#)

# EXHIBIT 6

PASSAGE BY SUBSTITUTE  
SB 2EX

Yea <input checked="" type="checkbox"/> : 32	Nay <input type="checkbox"/> : 21	Not Voting <input checked="" type="checkbox"/> : 0	Excused <input type="checkbox"/> : 3
--	-----------------------------------	--	--------------------------------------

<input checked="" type="checkbox"/> ALBERS, 56TH	<input type="checkbox"/> JAMES, 35TH
<input checked="" type="checkbox"/> ANAVITARTE, 31ST	<input type="checkbox"/> JONES, 10TH
<input checked="" type="checkbox"/> ANDERSON, 24TH	<input checked="" type="checkbox"/> JONES, 25TH
<input type="checkbox"/> ANDERSON, 43RD	<input type="checkbox"/> JONES II, 22ND
<input type="checkbox"/> AU, 48TH	<input type="checkbox"/> JORDAN, 6TH
<input checked="" type="checkbox"/> BEACH, 21ST	<input checked="" type="checkbox"/> KENNEDY, 18TH
<input checked="" type="checkbox"/> BRASS, 28TH	<input checked="" type="checkbox"/> KIRKPATRICK, 32ND
<input checked="" type="checkbox"/> BURKE, 11TH	<input type="checkbox"/> LUCAS, 26TH
<input checked="" type="checkbox"/> BURNS, 23RD	<input type="checkbox"/> MCNEILL, 3RD
<input type="checkbox"/> BUTLER, 55TH	<input type="checkbox"/> MERRITT, 9TH
<input checked="" type="checkbox"/> COWSERT, 46TH	<input checked="" type="checkbox"/> MILLER, 49TH
<input type="checkbox"/> DAVENPORT, 44TH	<input checked="" type="checkbox"/> MULLIS, 53RD
<input checked="" type="checkbox"/> DIXON, 45TH	<input type="checkbox"/> ORROCK, 36TH
<input checked="" type="checkbox"/> DOLEZAL, 27TH	<input type="checkbox"/> PARENT, 42ND
<input checked="" type="checkbox"/> DUGAN, 30TH	<input checked="" type="checkbox"/> PAYNE, 54TH
<input checked="" type="checkbox"/> GINN, 47TH	<input type="checkbox"/> RAHMAN, 5TH
<input checked="" type="checkbox"/> GOOCH, 51ST	<input type="checkbox"/> RHETT, 33RD
<input checked="" type="checkbox"/> GOODMAN, 8TH	<input checked="" type="checkbox"/> ROBERTSON, 29TH
<input type="checkbox"/> HALPERN, 39TH	<input type="checkbox"/> SEAY, 34TH
<input checked="" type="checkbox"/> HARBIN, 16TH	<input type="checkbox"/> SIMS, 12TH
<input type="checkbox"/> HARBISON, 15TH	<input checked="" type="checkbox"/> STRICKLAND, 17TH
<input checked="" type="checkbox"/> HARPER, 7TH	<input checked="" type="checkbox"/> SUMMERS, 13TH
<input type="checkbox"/> HARRELL, 40TH	<input type="checkbox"/> TATE, 38TH
<input checked="" type="checkbox"/> HATCHETT, 50TH	<input checked="" type="checkbox"/> THOMPSON, 14TH
<input checked="" type="checkbox"/> HICKMAN, 4TH	<input checked="" type="checkbox"/> TILLERY, 19TH
<input checked="" type="checkbox"/> HUFSTETLER, 52ND	<input checked="" type="checkbox"/> TIPPINS, 37TH
<input type="checkbox"/> JACKSON, 2ND	<input checked="" type="checkbox"/> WALKER, III, 20TH
<input type="checkbox"/> JACKSON, 41ST	<input type="checkbox"/> WATSON, 1ST

## PASSAGE

SB 2EX

Yea ☒ : 96Nay ☐ : 68Not Voting ☒ : 4Excused ☐ : 12

<input type="checkbox"/> ALEXANDER, 66TH	<input type="checkbox"/> DREYER, 59TH	<input type="checkbox"/> JONES, 53RD	<input type="checkbox"/> PRINCE, 127TH
<input type="checkbox"/> ALLEN, 40TH	<input checked="" type="checkbox"/> DUBNIK, 29TH	<input type="checkbox"/> KAUSCHE, 50TH	<input checked="" type="checkbox"/> PRUITT, 149TH
<input checked="" type="checkbox"/> ANDERSON, 10TH	<input type="checkbox"/> DUKES, 154TH	<input checked="" type="checkbox"/> KELLEY, 16TH	<input checked="" type="checkbox"/> RALSTON, 7TH
<input type="checkbox"/> ANULEWICZ, 42ND	<input checked="" type="checkbox"/> DUNAHOO, 30TH	<input type="checkbox"/> KENDRICK, 93RD	<input checked="" type="checkbox"/> RHODES, 120TH
<input checked="" type="checkbox"/> BALLINGER, 23RD	<input checked="" type="checkbox"/> EFSTRATION, 104TH	<input checked="" type="checkbox"/> KENNARD, 102ND	<input checked="" type="checkbox"/> RICH, 97TH
<input type="checkbox"/> BARR, 103RD	<input checked="" type="checkbox"/> EHRHART, 36TH	<input checked="" type="checkbox"/> KIRBY, 114TH	<input checked="" type="checkbox"/> RIDLEY, 6TH
<input checked="" type="checkbox"/> BARTON, 5TH	<input checked="" type="checkbox"/> ENGLAND, 116TH	<input checked="" type="checkbox"/> KNIGHT, 130TH	<input type="checkbox"/> ROBERTS, 52ND
<input type="checkbox"/> BAZEMORE, 63RD	<input checked="" type="checkbox"/> ERWIN, 28TH	<input checked="" type="checkbox"/> LAHOOD, 175TH	<input type="checkbox"/> ROBICHAUX, 48TH
<input checked="" type="checkbox"/> BELTON, 112TH	<input type="checkbox"/> EVANS, 57TH	<input checked="" type="checkbox"/> LARICCIA, 169TH	<input checked="" type="checkbox"/> SAINZ, 180TH
<input type="checkbox"/> BENNETT, 94TH	<input type="checkbox"/> EVANS, 83RD	<input checked="" type="checkbox"/> LEVERETT, 33RD	<input type="checkbox"/> SCHOFIELD, 60TH
<input type="checkbox"/> BENTLEY, 139TH	<input checked="" type="checkbox"/> FLEMING, 121ST	<input type="checkbox"/> LEWIS-WARD, 109TH	<input checked="" type="checkbox"/> SCOGGINS, 14TH
<input checked="" type="checkbox"/> BENTON, 31ST	<input type="checkbox"/> FRAZIER, 126TH	<input type="checkbox"/> LIM, 99TH	<input type="checkbox"/> SCOTT, 76TH
<input type="checkbox"/> BEVERLY, 143RD	<input type="checkbox"/> FRYE, 118TH	<input checked="" type="checkbox"/> LOPEZ, 86TH	<input checked="" type="checkbox"/> SEABAUGH, 34TH
<input checked="" type="checkbox"/> BLACKMON, 146TH	<input checked="" type="checkbox"/> GAINES, 117TH	<input checked="" type="checkbox"/> LOTT, 122ND	<input checked="" type="checkbox"/> SETZLER, 35TH
<input type="checkbox"/> BODDIE, 62ND	<input checked="" type="checkbox"/> GAMBILL, 15TH	<input checked="" type="checkbox"/> LUMSDEN, 12TH	<input type="checkbox"/> SHANNON, 84TH
<input checked="" type="checkbox"/> BONNER, 72ND	<input type="checkbox"/> GILLIARD, 162ND	<input type="checkbox"/> MAINOR, 56TH	<input type="checkbox"/> SHARPER, 177TH
<input type="checkbox"/> BRUCE, 61ST	<input checked="" type="checkbox"/> GILLIGAN, 24TH	<input type="checkbox"/> MALLOW, 163RD	<input type="checkbox"/> SINGLETON, 71ST
<input type="checkbox"/> BUCKNER, 137TH	<input type="checkbox"/> GLANTON, 75TH	<input type="checkbox"/> MARIN, 96TH	<input checked="" type="checkbox"/> SMITH, 18TH
<input checked="" type="checkbox"/> BURCHETT, 176TH	<input checked="" type="checkbox"/> GRAVLEY, 67TH	<input checked="" type="checkbox"/> MARTIN, 49TH	<input type="checkbox"/> SMITH, 41ST
<input type="checkbox"/> BURNOUGH, 77TH	<input checked="" type="checkbox"/> GREENE, 151ST	<input checked="" type="checkbox"/> MATHIAK, 73RD	<input checked="" type="checkbox"/> SMITH, 70TH
<input checked="" type="checkbox"/> BURNS, 159TH	<input checked="" type="checkbox"/> GULLETT, 19TH	<input checked="" type="checkbox"/> MATHIS, 144TH	<input checked="" type="checkbox"/> SMITH, 133RD
<input checked="" type="checkbox"/> BYRD, 20TH	<input checked="" type="checkbox"/> GUNTER, 8TH	<input type="checkbox"/> MCCLAIN, 100TH	<input checked="" type="checkbox"/> SMITH, 134TH
<input checked="" type="checkbox"/> CAMERON, 1ST	<input checked="" type="checkbox"/> HAGAN, 156TH	<input checked="" type="checkbox"/> MCDONALD, 26TH	<input type="checkbox"/> SMYRE, 135TH
<input checked="" type="checkbox"/> CAMP, 131ST	<input checked="" type="checkbox"/> HATCHETT, 150TH	<input type="checkbox"/> MCLAURIN, 51ST	<input checked="" type="checkbox"/> STEPHENS, 164TH
<input checked="" type="checkbox"/> CAMPBELL, 171ST	<input checked="" type="checkbox"/> HAWKINS, 27TH	<input type="checkbox"/> MCLEOD, 105TH	<input checked="" type="checkbox"/> TANKERSLEY, 160TH
<input type="checkbox"/> CANNON, 58TH	<input checked="" type="checkbox"/> HENDERSON, 113TH	<input checked="" type="checkbox"/> MEEKS, 178TH	<input checked="" type="checkbox"/> TARVIN, 2ND
<input checked="" type="checkbox"/> CANTRELL, 22ND	<input checked="" type="checkbox"/> HILL, 3RD	<input type="checkbox"/> METZE, 55TH	<input type="checkbox"/> TAYLOR, 91ST
<input checked="" type="checkbox"/> CARPENTER, 4TH	<input checked="" type="checkbox"/> HITCHENS, 161ST	<input type="checkbox"/> MITCHELL, 88TH	<input checked="" type="checkbox"/> TAYLOR, 173RD
<input checked="" type="checkbox"/> CARSON, 46TH	<input checked="" type="checkbox"/> HOGAN, 179TH	<input type="checkbox"/> MITCHELL, 106TH	<input type="checkbox"/> THOMAS, 21ST
<input type="checkbox"/> CARTER, 92ND	<input type="checkbox"/> HOLCOMB, 81ST	<input checked="" type="checkbox"/> MOMTAHAN, 17TH	<input type="checkbox"/> THOMAS, 39TH
<input checked="" type="checkbox"/> CHEOKAS, 138TH	<input type="checkbox"/> HOLLAND, 54TH	<input type="checkbox"/> MOORE, 90TH	<input type="checkbox"/> THOMAS, 65TH
<input type="checkbox"/> CLARK, 98TH	<input type="checkbox"/> HOLLY, 111TH	<input type="checkbox"/> MOORE, 95TH	<input checked="" type="checkbox"/> WADE, 9TH
<input type="checkbox"/> CLARK, 108TH	<input checked="" type="checkbox"/> HOLMES, 129TH	<input type="checkbox"/> NEAL, 74TH	<input checked="" type="checkbox"/> WASHBURN, 141ST
<input checked="" type="checkbox"/> CLARK, 147TH	<input type="checkbox"/> HOPSON, 153RD	<input type="checkbox"/> NELSON, 125TH	<input checked="" type="checkbox"/> WATSON, 172ND
<input checked="" type="checkbox"/> COLLINS, 68TH	<input checked="" type="checkbox"/> HOUSTON, 170TH	<input checked="" type="checkbox"/> NEWTON, 123RD	<input checked="" type="checkbox"/> WERKHEISER, 157TH
<input checked="" type="checkbox"/> COOPER, 43RD	<input type="checkbox"/> HOWARD, 124TH	<input type="checkbox"/> NGUYEN, 89TH	<input checked="" type="checkbox"/> WIEDOWER, 119TH
<input type="checkbox"/> CORBETT, 174TH	<input type="checkbox"/> HUGLEY, 136TH	<input checked="" type="checkbox"/> NIX, 69TH	<input type="checkbox"/> WILENSKY, 79TH
<input checked="" type="checkbox"/> CROWE, 110TH	<input type="checkbox"/> HUTCHINSON, 107TH	<input type="checkbox"/> OLIVER, 82ND	<input type="checkbox"/> WILKERSON, 38TH
<input type="checkbox"/> DAVIS, 87TH	<input type="checkbox"/> JACKSON, 64TH	<input type="checkbox"/> PARIS, 142ND	<input type="checkbox"/> WILLIAMS, 37TH
<input type="checkbox"/> DELOACH, 167TH	<input type="checkbox"/> JACKSON, 128TH	<input type="checkbox"/> PARK, 101ST	<input checked="" type="checkbox"/> WILLIAMS, 145TH
<input checked="" type="checkbox"/> DEMPSEY, 13TH	<input type="checkbox"/> JACKSON, 165TH	<input checked="" type="checkbox"/> PARRISH, 158TH	<input type="checkbox"/> WILLIAMS, 168TH
<input checked="" type="checkbox"/> DICKEY, 140TH	<input checked="" type="checkbox"/> JASPERSE, 11TH	<input checked="" type="checkbox"/> PARSONS, 44TH	<input checked="" type="checkbox"/> WILLIAMS, JR., 148TH
<input checked="" type="checkbox"/> DOLLAR, 45TH	<input checked="" type="checkbox"/> JENKINS, 132ND	<input checked="" type="checkbox"/> PETREA, 166TH	<input checked="" type="checkbox"/> WILLIAMSON, 115TH
<input type="checkbox"/> DOUGLAS, 78TH	<input checked="" type="checkbox"/> JONES, 25TH	<input checked="" type="checkbox"/> PIRKLE, 155TH	<input type="checkbox"/> WILSON, 80TH
<input type="checkbox"/> DRENNER, 85TH	<input checked="" type="checkbox"/> JONES, 47TH	<input checked="" type="checkbox"/> POWELL, 32ND	<input checked="" type="checkbox"/> YEARTA, 152ND

# EXHIBIT 7

**THE SENATE COMMITTEE ON REAPPORTIONMENT AND REDISTRICTING  
2021- 2022 ROSTER**

**Sen. John Kennedy, Chairman**

District 18  
231 Riverside Drive  
Macon, GA 31202

**Sen. Tonya Anderson**

District 43  
P.O. Box 1026  
Lithonia, GA 30058

**Sen. Gloria Butler**

District 55  
6241 Southland Trace  
Stone Mountain, GA 30087

**Sen. Mike Dugan**

District 30  
P.O. Box 1260  
Carrollton, GA 30112

**Sen. Marty Harbin**

District 16  
215 Greencastle Road  
Tyrone, GA 30290

**Sen. Harold Jones II**

District 22  
437 Walker Street  
Augusta, GA 30901

**Sen. Jeff Mullis, Ex-Officio**

District 53  
10052 North Highway 27  
Rock Spring, GA 30739

**Sen. Blake Tillery**

District 19  
404 Durden Street  
Vidalia, GA 30474

**Sen. Bill Cowsert, Vice-Chairman**

District 46  
P.O. Box 512  
Athens, GA 30603

**Sen. Dean Burke**

District 11  
1608 Pineland Drive  
Bainbridge, GA 39819

**Sen. Greg Dolezal**

District 27  
6505 Shiloh Road, Suite 200  
Alpharetta, GA 30005

**Sen. Steve Gooch**

District 51  
P.O. Box 600  
Dahlonega, GA 30533

**Sen. Ed Harbison**

District 15  
P.O. Box 1292  
Columbus, GA 31902

**Sen. Butch Miller**

District 49  
2420 Browns Bridge Road  
Gainesville, GA 30504

**Sen. Michael ‘Doc’ Rhett**

District 33  
P.O. Box 777  
Marietta, GA 30061



**2021- 2022 Rules for the Senate Committee on  
Reapportionment and Redistricting**

1. The quorum for the Committee shall be eight (8) members.
2. The Committee shall convene, recess, and adjourn upon the order of the Chairperson.
3. The Chairperson shall determine measures to be considered and the order in which such measures are considered.
4. The Rules of the Senate shall prevail in all matters not covered by these Committee Rules.
5. All amendments to legislation in the committee shall be delivered to the Chairperson no later than 24 hours prior to any called meeting of the Committee, unless the meeting is called on 24 hour notice, in which event amendments must be delivered to the Chairperson no later than 12 hours prior to the meeting.
6. These Committee Rules may be amended upon motion duly made and seconded and subsequently approved by two-thirds (2/3) of the members of the Committee provided that written notice has been given to the Chairperson (24) hours prior to the Committee Meeting.

**Minutes of the Senate Committee on Reapportionment and Redistricting  
Wednesday, November 3, 2021**

The Senate Committee on Reapportionment and Redistricting met on Wednesday, November 3, 2021 at 1:00 p.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Tonya Anderson (43rd)  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Marty Harbin (16th)  
Sen. Ed Harbison (15th)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th)  
Sen. Jeff Mullis (53rd), Ex-Officio  
Sen. Michael ‘Doc’ Rhett (33rd) (*Arrived Late*)  
Sen. Blake Tillery (19th)

**NOTE:** Sen. Greg Dolezal (27th) was absent.

Chairman Kennedy (18th) called the meeting to order at 1:05 p.m.

**2021- 2022 Senate Committee on Reapportionment and Redistricting Rules**

The Chair presented the 2021-2022 Senate Committee on Reapportionment and Redistricting Rules.

The Chair recognized Sen. Burke (11th) who made a motion to adopt the 2021-2022 Rules. Sen. Mullis (53rd) seconded the motion. The motion passed unanimously, by a vote of 12-0. A copy of the adopted rules are attached.

**NOTE:** Sen. Michael ‘Doc’ Rhett (33rd) arrived at 1:08 p.m.

**2021 Reapportionment and Redistricting Guidelines**

The Chair presented the proposed 2021 Reapportionment and Redistricting Guidelines.

The Chair recognized Sen. Cowsert (46th) who made a motion to adopt the 2021-2022 Rules. Sen. Gooch (51st) seconded the motion. The motion passed unanimously, by a vote of 13-0.

The Chair opened the floor for comments from the Committee.

Chairman Kennedy (18th) adjourned the meeting 1:16 p.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary

**Minutes of the Senate Committee on Reapportionment and Redistricting  
Thursday, November 4, 2021**

The Senate Committee on Reapportionment and Redistricting met on Thursday, November 4, 2021 at 1:00 p.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Tonya Anderson (43rd)  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Greg Dolezal (27th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Marty Harbin (16th)  
Sen. Ed Harbison (15th)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th)  
Sen. Jeff Mullis (53rd), Ex-Officio  
Sen. Michael ‘Doc’ Rhett (33rd)  
Sen. Blake Tillery (19th)

Chairman Kennedy (18th) called the meeting to order at 1:10 p.m.

The Chair called upon Vice-Chairman Cowsert (46th) to address the committee.

**SB 1 EX (Sen. Kennedy, 18th, LC 47 1159) “Georgia Senate Redistricting Act of 2021”; enact**

The Chair indicated that SB 1 EX would receive a hearing only. The Chair then presented the bill to the Committee.

The Chair presented and detailed each Senate district from the Proposed Senate District map relating to a proposed substitute to **SB 1 EX (LC 47 1165S)**.

The Chair opened the committee for comments and questions.

The Chair called upon Sen. Anderson (43rd) for a question.

The Chair called upon Sen. Butler (55th) for a question.

The Chair called upon Sen. Harbison (15th) for a question.

The Chair called upon Sen. Jones (22nd) for a question.

The Chair opened the floor for discussion from the public. He recognized the following:

Janet Grant, Fair Districts GA  
Salik Sohani, Georgia Muslim Voter Project  
Stephanie Ali, The New Georgia Project  
Cindy Battles, GA Coalition for the People's Agenda  
John Moye, Urban League of Greater Atlanta  
Cookie Barney, Augusta University  
Jewel Howard  
Aunna Denis, Common Cause Georgia  
David Garcia, GALEO  
Kareem El-Hosseiny, CAIR Georgia  
Vasu Abiramen, ACLU of Georgia  
Vivianne Moore, DeKalb NAACP  
Karen Davenport  
Markese Bryant, Georgia Alliance for Social Justice  
David Horton  
Durp Haynes  
Joshua Anthony, Young Democrats of Atlanta  
Keyanna Jones  
Hannah Joy Gebresilassie, Protect the Vote  
Katherine Maddox  
Marijke Kylstra, Fair Count  
Priscilla Smith  
Sen. David Lucas  
Shelia Stoval  
Biroel Jackson

**Committee Recommendation: SB 1 EX (LC 47 1159) No Action Taken**

The Chair announced that there would be a hearing on **SB 4 EX** at the next meeting.

Chairman Kennedy (18th) adjourned the meeting 4:16 p.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary

**Minutes of the Senate Committee on Reapportionment and Redistricting  
Friday, November 5, 2021**

The Senate Committee on Reapportionment and Redistricting met on Friday, November 5, 2021 at 11:00 a.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Greg Dolezal (27th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Marty Harbin (16th)  
Sen. Ed Harbison (15th)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th)  
Sen. Jeff Mullis (53rd), Ex-Officio  
Sen. Michael ‘Doc’ Rhett (33rd)  
Sen. Blake Tillery (19th)

**NOTE:** Sen. Tonya Anderson (43rd) was absent.

Chairman Kennedy (18th) called the meeting to order at 11:17 a.m.

**SB 4 EX** (Sen. Butler, 55th, LC 47 1154) “Georgia Senate Redistricting Act of 2021”; enact

The Chair recognized Sen. Butler (55th) for the purpose of presenting the bill. Sen. Butler (55th) presented the bill to the Committee.

Sen. Butler (55th) presented and detailed each Senate district from the Proposed Senate District map relating to **SB 4 EX (LC 47 1154)**.

The Chair opened the floor for questions and discussion from the Committee.

The Chair called upon Sen. Rhett (33rd) for a comment.

The Chair called upon Sen. Cowsert (46th) for a question.

Sen. Butler (55th) requested Sen. Parent (42nd) join the committee to answer committee member questions. The Chair asked Sen. Parent (42nd) to join the committee from the podium.

The Chair called upon Sen. Mullis (53rd) for a question.

The Chair called upon Sen. Miller (49th) for questions. Sen. Parent (42nd) spoke to the questions from the podium.

The Chair called upon Sen. Jones (22nd) for a question.

The Chair called upon Sen. Harbison (15th) for a question.

The Chair called upon Sen. Dolezal (27th) for a question. Sen. Parent (42nd) spoke to the question from the podium.

The Chair called upon Sen. Dugan (30th) for a question.

The Chair opened the floor for comments from the public. He recognized the following:

Amy Swygert

Ken Lawler, Fair Districts GA

Cindy Battles, GA Coalition for the People's Agenda

Keyanna Jones

Phyllis Richardson, Common Cause

Glory Kilanko, Women Watch Africa

The Chair announced that the Committee would stand in recess for a short break.

The committee recessed at 1:28 p.m.

The committee returned to order at 2:01 p.m.

**Committee Recommendation: SB 4 EX (LC 47 1154) No Action Taken**

**SB 1 EX** (Sen. Kennedy, 18th, LC 47 1159) “Georgia Senate Redistricting Act of 2021”; enact

The Chair opened the floor for a motion from the Committee.

Sen. Butler (55th) made a **motion to table SB 1 EX**. Sen. Harbison (15th) seconded the motion. The motion failed by a vote of 4-9.

Sen. Butler (55th), Sen. Harbison (15th), Sen. Jones (22nd), and Sen. Rhett (33rd) voted in favor of the motion.

Sen. Cowsert (46th), Sen. Burke (11th), Sen. Dolezal (27th), Sen. Dugan (30th), Sen. Gooch (51st), Sen. Harbin (16th), Sen. Miller (49th), Sen. Mullis (53rd), and Sen. Tillery (19th) voted in opposition to the motion.

The Chair recognized Sen. Cowsert (46th) who made a motion that **SB 1 EX Do Pass by Substitute (LC 47 1165S)**. Sen. Miller (49th) seconded the motion. The motion passed by a vote of 9-4.

Sen. Cowsert (46th), Sen. Burke (11th), Sen. Dolezal (27th), Sen. Dugan (30th), Sen. Gooch (51st), Sen. Harbin (16th), Sen. Miller (49th), Sen. Mullis (53rd), and Sen. Tillery (19th) voted in favor of the motion.

Sen. Butler (55th), Sen. Harbison (15th), and Sen. Jones (22nd), and Sen. Rhett (33rd) voted in opposition to the motion.

**Committee Recommendation: SB 1 EX DO PASS BY SUBSTITUTE (LC 47 1165S)**

Chairman Kennedy (18th) adjourned the meeting at 2:14 p.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary



**Minutes of the Senate Committee on Reapportionment and Redistricting  
Thursday, November 11, 2021**

The Senate Committee on Reapportionment and Redistricting met on Thursday, November 11, 2021 at 2:30 p.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Tonya Anderson (43rd)  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Greg Dolezal (27th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th)  
Sen. Jeff Mullis (53rd), Ex-Officio  
Sen. Michael ‘Doc’ Rhett (33rd)  
Sen. Blake Tillery (19th)

**NOTE:** Sen. Marty Harbin (16th) and Sen. Ed Harbison (15th) were absent.

Chairman Kennedy (18th) called the meeting to order at 2:40 p.m.

**HB 1 EX (Rep. Rich, 97th, LC 47 1163S) “Georgia House of Representatives Redistricting Act of 2021”; enact**

The Chair recognized Rep. Bonnie Rich (97th) for the purpose of presenting the bill. Rep. Rich (97th) presented the bill to the committee.

The Chair opened the floor for questions from the Committee.

The Chair recognized Sen. Jones (22nd) for a question.

The Chair recognized Sen. Butler (55th) for a question.

The Chair recognized Sen. Anderson (43rd) for a question.

The Chair opened the floor for comments from the public. He recognized the following:  
Patti Garrett and Sen. Elena Parent (42nd)  
Karen McCown, Fair Districts GA  
Cindy Battles, GA Coalition for the People’s Agenda  
Vasu Abhiraman,

The Chair opened the floor for debate and a motion from the Committee.

The Chair recognized Sen. Dugan (30th) who made a motion that **HB 1 EX Do Pass (LC 47 1163S)**. Sen. Gooch (51st) seconded the motion. The motion passed by a vote of 8-4.

Sen. Cowsert (51th), Sen. Burke (11th), Sen. Dolezal (27th), Sen. Dugan (30th), Sen. Gooch (51st), Sen. Miller (49th), Sen. Mullis (53rd), and Sen. Tillery (19th) voted in favor of the motion.

Sen. Anderson (43rd), Sen. Butler (55th), and Sen. Jones (22nd), Sen. Rhett (33rd) voted in opposition to the motion.

**Committee Recommendation: HB 1 EX DO PASS (LC 47 1163S)**

Sen. Kennedy (18th) will be the Senate Sponsor for **HB 1EX**.

Chairman Kennedy (18th) adjourned the meeting at 3:18 p.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary

**Minutes of the Senate Committee on Reapportionment and Redistricting  
Wednesday, November 17, 2021**

The Senate Committee on Reapportionment and Redistricting met on Wednesday, November 17, 2021 at 1:30 p.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Tonya Anderson (43rd)  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Greg Dolezal (27th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Marty Harbin (16th)  
Sen. Ed Harbison (15th)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th) (*Arrived Late*)  
Sen. Michael ‘Doc’ Rhett (33rd)  
Sen. Blake Tillery (19th) (*Arrived Late*)

**NOTE:** Sen. Jeff Mullis (53rd), Ex-Officio was absent.

Chairman Kennedy (18th) called the meeting to order at 1:39 p.m.

**NOTE:** Sen. Butch Miller (49th) arrived at 1:41 p.m.

**NOTE:** Sen. Blake Tillery (19th) arrived at 1:43 p.m.

**SB 2 EX (Sen. Kennedy, 18th, LC 47 1158) “Georgia Congressional Redistricting Act”;**  
**enact**

The Chair indicated that SB 2 EX would receive a hearing only. The Chair then presented the bill to the Committee.

The Chair presented and detailed each Congressional district from the Proposed Congressional District map relating to a proposed substitute to **SB 2 EX (LC 47 1166S)**.

The Chair opened the floor for questions and discussion from the Committee.

The Chair opened the floor for comments from the public. He recognized the following:  
Maggie Goldman, Resident of Johns Creek  
Cindy Battles, People’s Agenda  
Ken Lawler, Fair Districts GA

Mary Lou McClousky, Fair Districts GA  
Stephanie Ali, New Georgia Project Action Fund  
Marijke Kylstra, Fair Count  
Kat Maddox, Protect the Vote  
Vasu Abhiraman, ACLU of GA

The Chair opened the floor for final comments from the Committee.

The Chair recognized Sen. Gloria Butler (55th) for a comment.

The Chair announced that the committee will not be taking action on **SB 2 EX** at this time.

**Committee Recommendation: SB 2 EX (LC 47 1158) No Action Taken**

Chairman Kennedy (18th) adjourned the meeting at 2:48 p.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary

**Minutes of the Senate Committee on Reapportionment and Redistricting  
Thursday, November 18, 2021**

The Senate Committee on Reapportionment and Redistricting met on Thursday, November 18, 2021 at 9:30 a.m. in Room 450 of the State Capitol. The following Committee Members were in attendance:

**Members Present:**

Sen. John F. Kennedy (18th), Chairman  
Sen. Bill Cowsert (46th), Vice-Chairman  
Sen. Tonya Anderson (43rd) (*Arrived Late*)  
Sen. Dean Burke (11th)  
Sen. Gloria Butler (55th)  
Sen. Greg Dolezal (27th)  
Sen. Mike Dugan (30th)  
Sen. Steve Gooch (51st)  
Sen. Marty Harbin (16th)  
Sen. Ed Harbison (15th)  
Sen. Harold Jones II (22nd)  
Sen. Butch Miller (49th)  
Sen. Jeff Mullis (53rd), Ex-Officio  
Sen. Michael ‘Doc’ Rhett (33rd)  
Sen. Blake Tillery (19th)

Chairman Kennedy (18th) called the meeting to order at 9:43 a.m.

**SB 3 EX (Sen. Butler, 55th, LC 47 1160) “Georgia Congressional Redistricting Act of 2021”; enact**

The Chair recognized Sen. Butler (55th) for the purpose of presenting the bill. Sen. Butler (55th) presented the bill to the Committee.

Sen. Butler (55th) presented and detailed each Congressional district from the Proposed Congressional District map relating to **SB 3 EX (LC 47 1160)**.

**NOTE:** Sen. Anderson (43rd) arrived at 9:56 a.m.

The Chair opened the floor for questions and discussion from the Committee.

The Chair recognized Sen. Dolezal (27th) for a question.

The Chair recognized Sen. Jones (22nd) for a question.

The Chair recognized Sen. Anderson (43rd) for a question.

The Chair recognized Sen. Rhett (33rd) for a comment.

The Chair recognized Sen. Harbison (15th) for a question.

The Chair recognized Sen. Cowsert (46th) for a question. Sen. Butler (55th) asked Sen. Jones (22nd) to speak to the question.

Chairman Kennedy (18th) asked a question. Sen. Anderson (43rd), Sen. Jones (22nd), Sen. Harbison (15th) spoke to the question.

The Chair opened the floor for comments from the public. He recognized the following:

David Garcia, GALEO Impact Fund  
Geovani Serrano, GLAHR Action Network  
Julie Bolen, League of Women Voters of Georgia  
Ken Lawler, Fair Districts GA  
Julia Leon, Fair Districts GA  
John Moye, Urban League  
Katherine Maddox, Protect the Vote  
Vasu Abhiraman, ACLU of GA

The Chair opened the floor for a motion from the committee.

Sen. Butler (55th) made a motion that **SB 3 EX Do Pass (LC 47 1160)**. Sen. Anderson (43rd) seconded the motion. The motion failed by a vote of 5-9.

Sen. Anderson (43rd), Sen. Butler (55th), Sen. Harbison (15th), Sen. Jones (22nd), and Sen. Rhett (33rd) voted in favor of the motion.

Sen. Cowsert (46th), Sen. Burke (11th), Sen. Dolezal (27th), Sen. Dugan (30th), Sen. Gooch (51st), Sen. Harbin (16th), Sen. Miller (49th), Sen. Mullis (53rd), and Sen. Tillery (19th) voted in opposition of the motion.

**Committee Recommendation: SB 3 EX (LC 47 1160) No Further Action Taken**

**SB 2 EX** (Sen. Kennedy, 18th, LC 47 1158) “Georgia Congressional Redistricting Act”; enact

The Chair opened the floor for a motion from the committee.

The Chair recognized Sen. Cowsert (46th) who made a motion that **SB 2 EX Do Pass by Substitute (LC 47 1166S)**. Sen. Mullis (53rd) seconded the motion. The motion passed by a vote of 9-5.

Sen. Cowsert (46th), Sen. Burke (11th), Sen. Dolezal (27th), Sen. Dugan (30th), Sen. Gooch (51st), Sen. Harbin (16th), Sen. Miller (49th), Sen. Mullis (53rd), and Sen. Tillery (19th) voted in favor of the motion.

Sen. Anderson (43rd), Sen. Butler (55th), Sen. Harbison (15th), and Sen. Jones (22nd), and Sen. Rhett (33rd) voted in opposition of the motion.

**Committee Recommendation: SB 2 EX DO PASS BY SUBSTITUTE (LC 47 1166S)**

The Chair opened the floor for comments from the Committee.

The Chair recognized Sen. Anderson (43rd) for a comment.

Chairman Kennedy (18th) adjourned the meeting at 11:24 a.m.

Respectfully submitted,

/s/ Sen. John F. Kennedy (18th), Chairman

/s/ Ali Farmer, Recording Secretary

# EXHIBIT 8



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

GEORGIA STATE CONFERENCE  
OF THE NAACP; GEORGIA  
COALITION FOR THE PEOPLE’S  
AGENDA, INC.; GALEO LATINO  
COMMUNITY DEVELOPMENT  
FUND, INC.,

Plaintiffs,

v.

STATE OF GEORGIA; BRIAN  
KEMP, in his official capacity as  
Governor of the State of Georgia;  
BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia,

Defendants.

**Case No. 23-civ-5338-ELB-SCJ-SDG**

**Expert Report of Joseph Bagley, Ph.D.**

**Served on Behalf of the Georgia State Conf. of the NAACP, et al. Plaintiffs**

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should also follow this guidance in assisting courts to do the same. As such, and as a historian, I analyze here the second, third, fourth, and fifth *Arlington Heights* factors. The historical background relevant to invidious discrimination in voting, the legislative sequence of events and the legislature's procedures, and the statements made in the legislative history examined herein are, in my opinion, relevant to the Court's assessment of whether the General Assembly's actions in enacting SB 2EX/AP, SB 1EX/AP, and HB 1EX LC 47 1163S/AP are part of a continuum of the State of Georgia's longstanding acts of discrimination in voting and redistricting, particularly against Voters of Color.

In approaching this, I am guided by the common standards of historiography. This report thus draws upon existing, relevant, and well-regarded historiographical works, that is to say, valuable secondary sources. It relies as well upon primary sources in the form of historical and contemporaneous press coverage; U.S. Justice Department documents; relevant caselaw; and information made available to the public via the General Assembly's Legislative and Congressional Reapportionment Office online and the General Assembly's House Legislative & Congressional Reapportionment Committee and Senate Reapportionment & Redistricting Committee online, including video of proceedings, agendas, minutes, submissions from the public, and approved guidelines. These represent common sources for scholars in the humanities and the social sciences to reference, and I weigh all of these against one another, as is common in the field.

Plaintiffs have also asked me to opine on one of the so-called Senate Factors. These factors are derived from a Senate Judiciary Committee Report published during the reauthorization of the Voting Rights Act in 1982 and were adopted by the Supreme Court in the landmark *Gingles* decision that followed shortly thereafter. They typically inform expert inquiries in Section 2 litigation. Plaintiffs have only asked me to evaluate Senate Factor 6, which asks whether political campaigns in the area or political subdivision in question – here, of course, the State of Georgia – are “characterized by subtle or overt racial appeals.”

In my book, I discuss what I call colormasking, or what others have sometimes called colorblindness, a term I find is misleading to many people. I explain how lawmakers in the latter half of the 20<sup>th</sup> Century learned how to talk about and make laws designed to protect white rights without using overtly racial language. They were able to use coded language and thinly veiled racial appeals. Prominent examples include Ronald Regan's ads talking about the “Welfare Queen” and

- The public and members of the committee wanted more of a dialogue than a one-way-street of taking community comment at hearings.
- Hearings were not held, according to members of the public and the committees, in the most populous areas of the state where they should have been.
- Maps ought to reflect the growth of Georgia’s minority population, including Black, Latinx, and AAPI citizens.
- The committees should not engage in packing and cracking said populations for the purpose of vote dilution in violation of Section 2 of the VRA.

The public’s concerns regarding the nature of the town hall hearings – their being held before data and maps were published and the ‘input-only’ format, constitute procedural departures from, if not past practice, then certainly from what the mass of the public viewed as best practices and good governance. The committee’s failure to respond to public calls for more transparency, more time, a reflection of the state growing minority population, and to avoid packing and cracking, constitute substantive departures. The committee made abundantly clear that it wanted and deeply valued public input, meaning this was information, quoting *Arlington Heights*, “considered important by the decisionmaker.” That input “strongly favor[ed] . . . decision[s] contrary to the one[s] reached by the committee when it ignored the vast majority of the input.

a. The Committees

Each chamber in the Georgia General Assembly has a standing committee that shepherds legislation during the redistricting process, though the actual map drawing is largely handled behind the scenes by staff in the Legislative and Congressional Reapportionment Office (LCRO), especially Gina Wright, by leadership in the majority, and by counsel and technicians hired by the majority. During the 2021 redistricting cycle, the Senate Committee on Reapportionment and Redistricting included Chairman John Kennedy and fellow Republican Senators Bill Cowsert, Dean Burke, Greg Dolezal, Steve Gooch, Butch Miller, Mike Dugan, Jeff Mullins, and Blake Tillery. Democrats on the panel, who were also the only members of color on the panel, were Minority Leader Gloria Butler, and Senators Tonya Anderson, Ed Harbison, Harold Jones, and Doc Rhett. Members of the House Committee on Legislative and Congressional Reapportionment included Chairman Bonnie Rich and fellow Republican Representatives Houston Gaines, Darlene Taylor, Susan

Chairman Kennedy said that his legal counsel had assured him that the plan complied with the Voting Rights Act. He said that there would examples that I can give that probably will be alluded to during the course of this process of specific things that we learned that we tried to incorporate into the map drawing process” from the public town hall hearings. And he made note of over 700 comments that had been posted in the online portal, along with “emails, various forms of communication, that we're all logged and catalogued, and in fact, have been logged, if you will and available to all of our committee members.”

Sen. Kennedy reminded the committee that they had held an “Education Day” in August, whereat they heard from several groups, including the state NAACP. On that day, he explained, the guidelines that the committee officially adopted the day before had been “unofficially adopted.” These included, “constitutional requirements of equal protection, compliance with the Voting Rights Act, including a recognition of racially polarized voting, and then the importance of jurisdictional boundaries, prioritizing communities of interest, compactness, and continuity.” Kennedy said that all of this along with input on the proposed Democratic plan, was conveyed to staff in the LCRO, and that a plan was published two days prior “to allow time for some comment.”

The Chairman touted certain features of the plan, including the number of majority-Black and majority-nonwhite districts and opportunity districts. Vice Chairman Cowsert added that, during the summer the committee had heard from the public that they should not split counties, pair incumbents, split COIs, and draw noncompact districts and says that they did less of that than before. Chairman Kennedy specifically mentioned the fact that Democrats in leadership went out of their way to pair incumbents in 2001. He then explained certain granular features of the plan.

Leader Butler asked the Chair how he defined COIs, which he said was an “overly vague” proposition. She asked which specific elements of the plan had come from public feedback during the summer. Sen. Kennedy indicated that the plan reduced the number of splits in Pickens County, the “Onion Belt,” from three to two. Leader Butler asked why the concerns of the citizens in that county rose to a level of action whereas people from Bibb and Clarke did not get the same consideration. Chairman Kennedy said that one cannot look at any one county “in a vacuum” because any decision or movement has a ripple effect on the whole map.

morning will affect the resources and representation our communities receive for the next 10 years, the Senate and House committees have stated there will be a public period, a period for public input on these maps. But how can the public have input on something that was released just a few hours ago?”

j. November 18, 2021, House Legislative and Congressional Reapportionment Committee

The committee met again the following day and allowed for further public commentary without member response. By this time, residents of southwestern Cobb County had realized that their precincts had been moved into CD 14. Erica Thomas, the House representative from Austell, Powder Springs, and Mableton, condemned the dilution, in her estimation, of Black citizens of West Cobb and putting them in a CD in which “they so clearly do not belong.”<sup>118</sup>

Rep. Setzler defended Congresswoman Taylor Greene’s ability to represent voters of color. Leroy Hutchins, a resident of the area in question, demurred. He argued that West Cobb was part of Metro Atlanta and a hub of tourism with significant transportation concerns. This had nothing in common with the bulk of CD 14. Furthermore, he argued, “Congresswoman Marjorie Taylor Greene does not represent [our] values. What we saw in January [referring to the violence at the U.S. Capitol] was despicable, is not American, and her opinions of that day do not represent that of the area, and our communities.” Several other speakers relayed these same concerns, while others reiterated the long-running concerns about transparency.

k. November 18, 2021, Senate Committee on Reapportionment and Redistricting

At this meeting, Minority Leader Butler presented the Democratic Caucus’s plan for congressional redistricting. She took questions from Sen. Dolezal, who wondered why Forsyth was cut off from North Fulton and why South Gwinnett was paired with Newton County. Sen. Anderson replied that the latter was no change from the current map. Sen. Rhett lamented the inclusion of West Cobb in CD 14 in the GOP proposal and noted that CD 13 was far less packed in the Democratic proposal. Chairman Kennedy asked why there were so many county splits in the

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<sup>118</sup> <https://www.house.ga.gov/Committees/en-US/CommitteeArchives114.aspx>.

Democratic plan. Leader Butler said that that criterion was subordinated to compliance with the VRA.<sup>119</sup>

Sen. Cowser asserted that the Democrats' map packed "Caucasians" into CDs 3, 9, 11, and 14 and cracked them in CD 10 and that, insofar as Sen. Butler was "arguing" that "Caucasians" were in the minority in Georgia, then this ought to run afoul of the VRA. Sen. Jones replied that this was not his understanding of the meaning or purpose of the VRA. Chairman Kennedy expressed his frustration at Leader Butler for not sharing with him the information gleaned from the Black Caucus's tour of the state. Sens Harbison and Anderson argued that the information was largely redundant to information the committee received otherwise and that, insofar as it was not, the committee and chair were getting that feedback now by way of the Democrats' proposed map.

With that the committee took public commentary for the final time. Feedback was again overwhelmingly negative and focused on the same issues of transparency, time, and minority vote dilution. For example, David Garcia of the Vallejo Impact Fund said that the majority's map, in his view, "cracks populations of people of color dilutes minority voting strength and racially gerrymandered districts to make it more difficult if not impossible, for voters of color to elect candidates of choice." Among the "most egregious" examples of this were increasing the White population in CD 6 by reaching out into Cherokee, Forsyth, and Dawson, the packing of CD 13, and the cracking of Cobb between CDs 6, 11, 13, 14.

Julie Bolen expressed the frustration of many when she said, "Since you started having hearings over the summer, we and our fellow Georgians have asked repeatedly for fairness, more opportunities for public input and transparency. . . . You allowed us to provide comments without seeing maps that you never let the public ask you questions and get answers about your processes and your reasoning and drawing the district lines. Katherine Maddux addressed the chairman and suggested that perhaps he could have approached the Black Caucus for information and not the other way around, saying you don't need a person of color to bring to you a group of colors information." She added that his other White members, namely Senator Cowser's, upbraiding of other minority members of the committee was "really uncomfortable" to witness.

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<sup>119</sup> <https://vimeo.com/showcase/gasenrandr?page=1>.



Finally, Vasu Abdirahman cautioned that the majority ought to be wary of attempts to mechanically increase or artificially maintain the same percentage of black voters in districts already electing candidates preferred by black voters,” under what he characterized as “the guise of VRA compliance.” Senator Tillery’s subsequent questioning of Mr. Abdirahman revealed what appeared to be a misunderstanding of the language “candidate of choice,” which Sen. Tillery seemed to think this meant a candidate of the voter’s race. Sen. Tillery’s and the other White committee members, save for Sen. Cowsert, were largely silent for the entire process.

The committee next voted down Leader Butler’s plan 5-9, along racial lines, and voted favorably on Chairman Kennedy’s plan along the same lines.

k. November 19, 2021, the Senate Floor – the Congressional Plan

Unsurprisingly, when the majority’s congressional plan came before the full assembly, the Senate floor debate hinged on the same issues as all previous debate and public commentary: Black members argued that the plan packed and cracked Black voters, lacked adequate time for consideration give its eleventh-hour publication and the fact that the vast majority of public input came prior to said publication, and was the result of a closed-door process that flew in the face of relentless public pleas for transparency.<sup>120</sup>

Senator Parent noted the state’s minority population growth, as many legislators and members of the public had before and lamented that the majority’s plan did not reflect that. She recalled that “citizens that spoke up at town halls all summer long, and many of whom came to speak before the redistricting committees, pleaded over and over for a transparent process, and fair maps that would reflect Georgia’s population and political preference.” But, she said, “When the committee hearings commenced, there were members of the committee that spent a great deal of time, challenging members of the public, and even fellow senators on whether feedback was provided or received by the majority party instead of on the substance of the feedback being put forth.”

Senator Parent also criticized the public portal. It was, she said, difficult to find on the legislative website and, as members of the public had pointed out, did not allow for attachments and thus map submissions. Members also wondered, she said, if any of the comments were being considered, as there was no feedback nor

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<sup>120</sup> <https://vimeo.com/georgiastatesenate>.

any guidance given as to how public input would be reviewed, processed, considered, or implemented. In Parent's view, the public feedback process represented "a fake pretense" designed to "mollify us into thinking our concerns are being heard and acted upon."

Senator Harold Jones called the constant comparisons to 2001 and 2011 "foolish" and "not good government." Senator Nikki Merritt noted, "When these maps were dropped Wednesday afternoon, we were not even given them, and now here we are today and the map's not up here. I thought it was gonna be up here." She also reiterated what others had said regarding the identity of the GOP's RPV expert: "We were not given the name or contact information of the individual and the majority party, that the majority party claims was specific that was specially hired by legislative counsel, and was available to both parties, Despite repeated requests." She also questioned the public hearing process, saying, "The majority of members of this committee did not answer questions from the public, who came to speak on behalf of themselves and the community. The only explanation we've been given is that you can't look at any district in a vacuum, that every change affects all the other districts. But what they're saying is that there is a driving force behind all of their changes. But we know that force is preserving a Republican majority. That's the elephant in the room."

Senator Michelle Au and a few others focused on the changes to CD 6. Sen. Au said, "The map for the Georgia six should have been the easiest part of your job." It was "the closest already to ideal population size." However, she said, "the Republican congressional map shifts nearly 50% of the metro Atlanta population out of the sixth district, and brings in a fresh batch of more than 350,000 voters from Republican strongholds as far flung as Cherokee, Forsyth and Dawson counties."

Senators Gail Davenport and Donzella James expressed concern that the General Assembly seemed to specifically be "target[ing] and discriminat[ing] against women of color." Sen. Davenport mentioned the arrests of then Senator Nikema Williams during a protest at the capitol in 2018 and of Rep. Park Cannon in 2020. Sen. James explained that, in her view, "The majority party is targeting a black woman [McBath], one of only two in our delegation, in order to redraw her district to make it safely Republican. That's unacceptable. In the previously passed legislative maps," she added, "Republicans targeted a female senator who happens to also be the only female Asian American senator in Georgia [Michelle Au], and it



1. November 20, 2021, House Legislative and Congressional Reapportionment Committee

The House committee met again on November 20 and took public commentary via Zoom. Members of the public continued the outpouring of concern over moving West Cobb into CD 14. Ashley Whaley said that while Congressman Loudermilk “may not be my choice to fill the seat of the 11th district, he's still someone who I communicate with and can trust to be levelheaded and reasonable.” She argued that being put into Congresswoman Taylor Greene’s district was more akin to “an abusive relative” and she decried what Ms. Taylor Greene stood for “ideologically and morally.” Deborah Johnson added her belief that the Congresswoman had “no empathy for humanity and no sympathy for the dead or the living.”<sup>121</sup>

Others spoke about the “reprehensible” changes to CDs 6 and 7. Hasan Arwen of South Forsyth argued, “By extending District Six in the Dawson Cherokee northern Forsyth, you've now taken two completely different areas in demographics, views and issues and placed them into one district and attempt to dilute the voices of one of the fastest growing areas in America in terms of population and diversity, and we do not support it whatsoever.” Julian Fortuna added, “This is a clear gerrymandering attempt intended to disadvantage our incumbent and distance our relationship with someone who represents us very well. The current District Six is a community of interest of suburban voters in the North Atlanta suburbs.” Anna Hall made note of Forsyth’s history of violence and disenfranchisement directed at Black citizens and said that she was unaware of this history until recently. She indicated that North Forsyth continued to bear that legacy while the southern portion of the county had grown more inclusive and progressive.

Marin Iman, a self-described “young Asian American female,” indicated that she was “appalled” at the dilution of minority votes in CD 6 to push out Rep. McBath. Harold Kurtz of the Jewish Community Relations Council concluded public comment by saying, “Although I'm reluctant to use the word racist, the obvious step of the proposed map of congressional districts is to eliminate representative Lucy McBath from the congressional delegation. Placing Dawson and Forsyth counties and Representative [McBath’s] district and taking out her DeKalb portion of the district runs counter to the principle of placing communities of interest together. As a small minority, the Jewish community will also see its interests hurt

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<sup>121</sup> <https://www.house.ga.gov/Committees/en-US/CommitteeArchives114.aspx>.

by the changes to District Six, while only 2% or less of the total population of Georgia is Jewish. The Jewish community is a substantial portion of District Six, the changes will dilute already small ability to impact the composition of the congressional delegation. It will hurt our own chances of having representation that reflects our overall needs and desires.”

The bill passed through the committee favorable with a vote. No Black members voted Aye.

m. November 22, 2021, the House Floor – Congressional Plan

When the majority’s congressional plan came before the full House of Representatives on November 22, Black members denounced it in the same terms as those in the Senate had done: in their view it deliberately targeted McBath as a woman of color; it was the culmination of a closed-door process from which they had been shut out, especially by the LCRO and the committee chair; that the map failed to account for the state growing communities of color; that the town hall lineup avoided highly populated counties because of their proportion of communities of color; and the town hall process, in any case, was superficial since no maps were available at that time for the public to review. Minority Leader Beverly said that, despite the continuous pleas dating back to the summer for transparency, “We are fully aware that the process was rushed and secretive with the congressional map released just three hours before public comment was scheduled to begin last week.” He also explained that he and other Democratic Caucus members, when maps were “finally released,” “attempted to meet with the reapportionment office to look more closely at the Republican map. But we were met with a closed door, a locked gate with a detour sign that said, ‘Go see the chair first.’ Why does a member of this body need permission from another party to meet with a nonpartisan office in the General Assembly?”<sup>122</sup>

Representative Miriam Paris argued that, “At a time when women are already underrepresented, particularly women of color, we should not be drawing maps that target women incumbents to make it harder for them to run and win in new districts. But the map before us today does just exactly that.” Representative Will Boddie spoke to the concerns regarding proportionality and minority population growth and suggested that the map violated the VRA. Rep. Matthew Wilson accused the majority of “intentionally target[ing] incumbent women and voters of color to dilute

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<sup>122</sup> <https://vimeo.com/georgiahouse/albums/page:1/sort:date>.

retained her seat, told White voters that millions of illegal immigrants will “replace you,” in reference to a racist conspiracy theory.<sup>131</sup>

## VIII. CONCLUSION

The court will determine whether or not the General Assembly was motivated by discriminatory intent when it passed the bills in question. As an expert witness and a historian, I can only offer my opinion as to what the public record reveals. In my opinion, it reveals enough for the court to determine that these lines were drawn, in accordance with a very long and robust and relentless history and tradition in the state of Georgia, to deny voters of color their equitable right to participate in the political process. The nature of this report, given my findings, is to present a mosaic of a continuum. What we have seen in the last year or two is an outgrowth of what we have seen for decades, in my opinion. Black citizens, along now with Latinx and AAPI citizens, are being denied an equal seat at the political table as White men, by and large, attempt to hold on to political power. It is telling that Republican legislators have so often evoked 2001, when White men, largely, in the Democratic party attempted to manipulate the size of districts to hold onto power. With the demographic changes in Georgia that citizen after citizen and lawmaker after lawmaker evoked during this process, one cannot help but think the motivation on the other side is much the same, as the electorate has grown more diverse.

Scrutinizing the passage of the laws, in any case, reveals unquestionable historical discrimination, procedural and substantive departures in the legislative process – failing to make time for public comment after maps were published at the last minute, refusal to allow access to the map-drawing process, rushing the process in general despite massive public outcry to the contrary, failing to account for minority population growth, potentially targeting not only minority voters but potential Black female incumbents in drawing lines, packing and cracking Black and other minority voters in order to protect Republican incumbents. Accordingly, I submit this report in support of the court should it find in favor of the Plaintiffs on the claim of discriminatory intent.

I reserve the right to supplement this report if additional facts, testimony, and/or materials that may come to light.

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<sup>131</sup> Liz Goodwin, “Racist GOP appeals heat up in final weeks before midterms,” *Washington Post*, Oct. 15, 2022, <https://www.washingtonpost.com/politics/2022/10/15/racist-appeals-heat-up-final-weeks-before-midterms/>.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of January 2023 at

**Joseph  
Bagley** Digitally signed by  
Joseph Bagley  
Date: 2023.01.13  
23:42:01 -05'00'

# EXHIBIT 9

JUNE 16, 2021 BY BETSY THEROUX

# House and Senate Reapportionment Committees to Hold Statewide Town Hall Hearings

ATLANTA – The House Legislative & Congressional Reapportionment Committee, chaired by State Representative Bonnie Rich (R-Suwanee), and the Senate Reapportionment and Redistricting Committee, chaired by State Senator John F. Kennedy (R-Macon), will hold a series of joint town hall hearings across the state of Georgia. Additional details regarding the public comment hearing locations will be forthcoming; the hearing schedule is as follows:

- Monday, June 28, 2021, from 5 – 7 p.m. in Atlanta;
- Tuesday, June 29, 2021, from 5 – 7 p.m. in Cumming;
- Wednesday, June 30, 2021, from 5 – 7 p.m. in Dalton;
- Tuesday, July 6, 2021, from 5 – 7 p.m. in Athens;
- ~~Wednesday, July 7, 2021, from 5 – 7 p.m. in Augusta;~~ (RESCHEDULED)
- Monday, July 26, 2021, from 5 – 7 p.m. in Brunswick;
- Tuesday, July 27, 2021, from 5 – 7 p.m. in Albany;
- Wednesday, July 28, 2021, from 5 – 7 p.m. in Columbus;
- Thursday, July 29, 2021, from 5 – 7 p.m. in Macon;
- Friday, July 30, 2021, from 5 – 7 p.m. via virtual participation only;
- Wednesday, August 11, 2021, from 5 – 7 p.m. in Augusta (Martinez);
- ~~Monday, August 30, 2021, from 5 – 7 p.m. in Augusta (Martinez);~~ (RESCHEDULED to an earlier date – Aug. 11)

During these town hall-style hearings, members of the committees will hear and receive input from residents regarding the state's redistricting process. These public hearings will be livestreamed and archived at [www.legis.ga.gov](http://www.legis.ga.gov).

###

 BONNIE RICH

# HOUSE LEGISLATIVE & CONGRESSIONAL REAPPORTIONMENT COMMITTEE, STATE  
REPRESENTATIVE BONNIE RICH



# EXHIBIT 10





For Immediate Release  
Monday, June 7, 2021

Contact:  
Betsy Theroux  
(404) 656- 3996  
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## House and Senate Reapportionment Committees to Hold Joint Virtual Town Hall Hearing

ATLANTA – The House Legislative & Congressional Reapportionment Committee, chaired by State Representative Bonnie Rich (R-Suwanee), and the Senate Reapportionment and Redistricting Committee, chaired by State Senator John F. Kennedy (R-Macon), will hold a joint virtual town hall hearing on **Tuesday, June 15, 2021, from 5 – 7 p.m. via Zoom. Advanced registration is required for virtual participation; to register for Zoom access and sign-up to speak, please click here. To watch a live stream of this meeting, please visit [www.legis.ga.gov](http://www.legis.ga.gov).**

During this virtual town hall-style hearing, members of the committees will hear and receive input from residents regarding the state's reapportionment process. Georgia residents may provide testimony via Zoom for this virtual hearing. Individual testimony will be between two to five minutes each. Time limits are subject to change depending on how many individuals sign up to speak. The public may also submit written comments, and the method for submission of written comments will be forthcoming.

This virtual town hall hearing is a part of a series of joint town hall hearings across the state of Georgia. Additional details regarding the town hall hearing locations will be forthcoming.

**WHO:** Members of the House Legislative & Congressional Reapportionment Committee  
Members of the Senate Reapportionment and Redistricting Committee

**WHAT:** Joint Virtual Town Hall Hearing

**WHEN:** Tuesday, June 15, 2021  
5 – 7 p.m.

**WHERE:** Live stream: [www.legis.ga.gov](http://www.legis.ga.gov)  
Zoom access registration: <https://bit.ly/3vV3N5v>

###

# EXHIBIT 11

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

4       Georgia State Conference  
5       of the NAACP; Georgia  
6       Collation for the People's  
7       Agenda, Inc; Galeo Latino  
8       Community Development Fund,  
9       Inc.,

10                   Plaintiffs,

11                   vs.

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

12       STATE OF GEORGIA; BRIAN KEMP,  
13       IN HIS OFFICIAL CAPACITY AS  
14       THE GOVERNOR OF THE STATE OF  
15       Georgia; Brad Raffensperger,  
16       in his official capacity as  
17       the secretary of State of  
18       Georgia,

19                   Defendants.

20                   VIDEOTAPED HYBRID ZOOM  
21                   30(b)(6) and 30(b)(1)  
22                   DEPOSITION OF  
23                   BONNIE RICH  
24                   January 18, 2023  
25                   9:11 A.M.

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

1 the Georgia Congressional district?

2 A. Yes.

3 Q. When did you first see this proposed map?

4 A. I don't remember. Probably -- it was  
5 definitely after it was published to the public.

6 Q. Okay. So sometime after September 27?

7 A. If that was after it was made public on  
8 the website.

9 Q. Were you aware that this map was being  
10 drawn?

11 A. No.

12 Q. Senator Kennedy hadn't mentioned it to  
13 you?

14 A. No.

15 Q. Okay. Do you have an understanding of who  
16 drew this map?

17 A. I would assume that it was our  
18 Redistricting Office with input from Senator Kennedy  
19 and maybe members of their leadership, but I don't  
20 know.

21 Q. And did -- did you have any role in  
22 drawing any parts of this plan?

23 A. No.

24 Q. Did you review this plan in detail once it  
25 was published?

1           A.     Somewhat.   Not -- I mean, detail, that's  
2     relative.   But I did review it, yes.

3           Q.     And what -- what were your conclusions  
4     about it?

5           A.     The only thing that I remember is that  
6     they -- they made a division somewhere up in the  
7     northern part of the state that a lot of the people  
8     spoke out about in our public town halls.   I can't  
9     remember now what it was.   I thought they divided  
10    Pickens County, but it doesn't look like they did  
11    here, so I -- I don't remember.

12          Q.     Did you have a view on whether -- on -- on  
13    the -- the quality of this map?

14          A.     No.

15          Q.     Did you use a particular software to  
16    review the districts?

17          A.     No.

18          Q.     You just looked at the map printed out?

19          A.     Correct.

20          Q.     Did you consider any data when you looked  
21    at the map?

22          A.     No.

23          Q.     Did you consider any redistricting  
24    criteria when you looked at this map?

25          A.     No.

1 Q. Did you have any concerns about this map?

2 A. No, I didn't give any thought to that.

3 Q. Did you provide any feedback on this map?

4 A. No.

5 Q. You didn't speak to Senator Kennedy about  
6 it?

7 A. Not that I recall.

8 Q. Or Lieutenant Governor Duncan?

9 A. No.

10 Q. Or anyone from their offices?

11 A. No.

12 Q. Did anyone else ask you about this map  
13 after it was published?

14 A. Not that I recall. People were discussing  
15 the fact that it existed, but I don't have specific  
16 recollection of conversations.

17 Q. And is it fair to say you reviewed this  
18 map just by looking at -- looking at it and that was  
19 pretty much the sum total of your analysis?

20 A. Yes.

21 Q. Okay. And so you didn't provide any input  
22 on it to anyone?

23 A. No.

24 Q. Okay. I'm going to do the next exhibit.  
25 I believe -- I believe we're on Exhibit 5.

1 I have babies.

2 BY MR. MELLMAN:

3 Q. And do you recognize this document?

4 A. Yes. It appears to be a press release.

5 Q. And what is it -- what is it discussing?

6 A. The town hall meeting.

7 Q. Okay. And do you see a date on there?

8 A. I see the date it was printed. Oh,  
9 June 16, 2021.

10 Q. Okay. And so do you agree that this  
11 document shows that from June 28 through August 11  
12 the House and Senate committees held town halls in  
13 Georgia about the redistricting process?

14 A. Yes.

15 Q. And you recall that happening?

16 A. Yes.

17 Q. You recall the town halls taking place?

18 A. Yes, yes.

19 Q. And as we discussed before, the full  
20 census wasn't released until September.

21 So these town hall meetings took place  
22 before the census data was fully released?

23 A. Yes.

24 Q. Why was that?

25 A. In order to visit as many places in the



1 committee as well?

2 A. Oh, I don't know what the Senate committee  
3 did. The House.

4 Q. Do you know if any of the town hall  
5 locations were inaccessible to people with  
6 disabilities?

7 A. It's my understanding that none of them  
8 were. I did receive an email from someone claiming  
9 that the Augusta location was not accessible. But I  
10 brought that up to the legislator who arranged this,  
11 and he went to the venue and, ultimately, that was a  
12 false claim, is what was reported to me.

13 Q. Were there any other redistricting town  
14 halls held after the release of the census data?

15 A. I do not recall.

16 Q. To your knowledge, was the August 11,  
17 2021, town hall the last one?

18 A. If that's what our records show on the  
19 Redistricting Committee website. I -- I don't have  
20 independent recollection.

21 Q. Did you publish any redistricting  
22 information in languages other than English?

23 A. No.

24 Q. Do you recall the date that the census  
25 released the results of the 2020 census?

1 A. I don't.

2 Q. Okay. I'm going to mark Exhibit 16. This  
3 is just a...

4 (Plaintiffs' Exhibit 16 was marked for  
5 identification.)

6 BY MR. MELLMAN:

7 Q. And what is this document?

8 A. It looks like a printout that someone made  
9 from the United States government outlining the  
10 census timeline for --

11 Q. Were you following --

12 A. -- 2020.

13 Q. -- the census timeline at the time that  
14 the results were being released?

15 A. I was being updated by our Reapportionment  
16 Office.

17 Q. As -- as they received the data or  
18 received updates?

19 A. Yes.

20 Q. Okay. And according to this timeline, the  
21 census data was not initially released until  
22 August 12. It's on the second page.

23 A. Okay.

24 Q. Do you recall that -- receiving that data  
25 on August 12?

1           A.    I recall the Reapportionment Office  
2           talking to us about that.   I think that might be  
3           that legacy data that I referenced earlier.

4           Q.    And looking at the -- the next bullet  
5           there it appears that the final redistricting data  
6           was released September 16?

7           COURT REPORTER:   Excuse me, Mr. Mellman.  
8           You have to get closer to the microphone.

9           BY MR. MELLMAN:

10          Q.    It appears the final redistricting data  
11          was released September 16?

12          A.    Yes.

13          Q.    Why is the census data important in  
14          drawing districts, to your knowledge?

15          A.    Well, to my knowledge, that's -- that's  
16          what's used to determine where the growth and  
17          population retraction are.   So that guides how you  
18          draw the maps.

19          Q.    And so you agree that before seeing the  
20          census data, the public wouldn't be able to know  
21          which areas of the state had grown and which had  
22          shrunk?

23          A.    No, I don't agree with that.   Informed  
24          people already knew that generally there was a lot  
25          of growth in the metro Atlanta area and that there

1 Q. So the only communications you received  
2 about it were via email by constituents?

3 A. Yes. There could have been some Democrat  
4 legislators who were running for other offices who  
5 spoke about it publicly, but I don't recall anyone  
6 coming to me about it.

7 Q. And regarding interactions with the  
8 Georgia NAACP, did you come to understand that there  
9 was a mixup regarding the invitation to speak with  
10 you?

11 A. Yes. Because they -- they went to great  
12 lengths to get us written prop- -- the written  
13 presentation. Yeah.

14 Q. And they did, in fact, submit a written  
15 presentation?

16 A. Yes.

17 Q. Did you review that presentation?

18 A. I did.

19 Q. Did you adopt any of the recommendations  
20 made in it?

21 A. I don't know if we did or not.

22 Q. Do you recall any that you made?

23 A. No, I don't recall.

24 Q. Okay. I'm going to ask you to go back to  
25 the document labeled LEGIS00000312. It's

# EXHIBIT 12

Georgia State Conference of The NAACP, et al. v. S

Page 1

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

GEORGIA STATE CONFERENCE )  
OF THE NAACP, et al., )  
Plaintiffs, )

) Case No:

vs. )

) 1:21-CV-5338-ELB-SCJ-SDG

STATE OF GEORGIA, et al., )  
Defendants. )

COMMON CAUSE, et al., )  
Plaintiffs, )

) Case No:

vs. )

) 1:22-CV-00090-ELB-SCJ-SDG

BRAD RAFFENSPERGER )  
Defendant. )

DEPOSITION OF  
JOSEPH BAGLEY, PH.D.

February 28, 2023

10:04 a.m.

Taylor English Duma, LLP  
1600 Parkwood Circle, SE  
Suite 200  
Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

1 statement of the expert opinions you're offering in  
2 this case?

3 A. It is.

4 Q. And are you offering the opinion that  
5 Georgia's 2021 redistricting plans for Congress,  
6 State Senate and State House were adopted with  
7 discriminatory intent?

8 MR. DAVIS: Objection to the extent it  
9 calls for a legal conclusion, but you may  
10 answer.

11 THE WITNESS: So the way I see my role  
12 is not to make the final conclusion but to  
13 say that in my opinion as a historian, there  
14 is enough evidence there for the Court to  
15 make that finding.

16 BY MR. TYSON:

17 Q. So you're not saying that discriminatory  
18 intent was the driving factor of the legislature.  
19 You're saying that there's evidence that would  
20 support that finding?

21 A. Correct.

22 Q. And in terms of other pieces -- turn to  
23 page 6 of your report: The purpose, methodology and  
24 summary findings.

25 You're opining about on the top of page 7

1 A. In plain obvious terms, that is correct.

2 Q. And so aside, I guess, from that limitation  
3 on the first factor, the only factors from Arlington  
4 Heights you're offering any opinions about in this  
5 report are the second, third, fourth and fifth  
6 factors; right?

7 A. Correct.

8 Q. And you're not offering an opinion on any  
9 other Senate factor other than Senate Factor 6;  
10 correct?

11 A. Yes, sir.

12 Q. So let's look at the top of page 6 of what  
13 the plaintiff asked you to do here. And you were  
14 asked to examine the drafting, passage and enactment  
15 of the Georgia General Assembly's new congressional  
16 State House and State Senate redistricting plans.

17 That was kind of piece number one; right?

18 A. Yes.

19 Q. And that analysis and evaluation didn't look  
20 at boundaries, political impact or racial make-up  
21 after those plans; right?

22 A. Not in the way that a political scientist  
23 would.

24 Q. Was there any way that you looked at  
25 boundaries, political impact, racial make-up of the



1 districts themselves as part of your analysis?

2 A. Not in terms of a numbers-crunching  
3 analysis, if that's what you mean.

4 Q. And you primarily reviewed the process by  
5 which those maps became law. Is that fair to say?

6 A. Yes, sir.

7 Q. So I'm looking at paragraph four in this  
8 section. You say: Insofar, as the Supreme Court  
9 directed trial courts to use this framework --  
10 referring to Arlington Heights framework -- in making  
11 determinations on discriminatory intent, experts in  
12 my understanding should also follow this guidance in  
13 assisting courts to do the same.

14 Where did you gain the understanding that  
15 you're referencing in that paragraph?

16 A. From Arlington Heights itself and from -- in  
17 previous work on Arlington Heights framework reports.

18 Q. In your previous work on Arlington Heights  
19 framework reports, have you reached a conclusion  
20 about the intent of the legislature you were  
21 analyzing or did you reach an opinion similar to that  
22 here that just evidence would support an intent  
23 finding?

24 A. Similar to this here.

25 Q. In the next paragraph, you talk about you're

1 A. Yes, including Chairwoman Rich.

2 (Reporter asks for clarification.)

3 BY MR. TYSON:

4 Q. And you're aware the speaker pro tem of the  
5 Georgia House is a Republican woman?

6 A. Yes. Jones.

7 Q. And you're aware that the chair of the  
8 Public Service Commission is a statewide elected  
9 Republican woman?

10 A. Right.

11 Q. You then reference Republicans in the  
12 General Assembly routinely invoked the Democrats'  
13 abuse of power in the 2001 redistricting cycle as an  
14 excuse for their own potential abuse of power in the  
15 current cycle.

16 Are you opining that the 2021 maps were an  
17 abuse of power?

18 A. What I mean there is that when they are  
19 confronted by members of the public at the town halls  
20 at the public hearings, these people are expressing  
21 their opinion that these same sort of things are  
22 occurring. And the response from leadership very  
23 often to those comments was, well, the Democrats did  
24 it in 2001.

25 Q. And so is it your opinion that the 2021

1       redistricting maps in Georgia were an abuse of power  
2       by Republican legislatures?

3             A.    I couldn't say that outright.   No.

4             Q.    And you'd agree that in Georgia, race and  
5       politics tends to be coextensive; right?

6             MR. DAVIS:   Objection.   You may answer.

7             THE WITNESS:   I'm not sure I would say  
8       "coextensive."   Obviously, as a historian, I  
9       appreciate that they are deeply intertwined  
10      historically.   So, yeah, I...

11      BY MR. TYSON:

12            Q.    Do you believe it's possible to separate  
13      racial goals from political goals by elected  
14      officials in Georgia?

15            A.    Could you restate?

16            Q.    Yeah.   Do you believe that it's possible to  
17      determine if a legislator is motivated by  
18      partisanship or by racial goals?

19            A.    It's difficult to get into the heart or the  
20      mind of anyone, particularly a specific legislator.

21      And, again, as a historian, you appreciate that,  
22      historically speaking, race and politics in a state  
23      like Georgia have a very long history.

24            In an inquiry like this, however, you  
25      consider political motivations.   You consider

1 to say you're reporting what people asked for instead  
2 of offering your own opinions about the process?

3 A. I am reporting what people have said in  
4 large part in this portion. Although, it's part of  
5 performing my own opinion in the broader report.

6 And so when I see a chorus of views or a  
7 view to me that continues throughout this process  
8 even after maps are published and that dovetails with  
9 the other pieces of the report, then that rises to me  
10 to a level of significance.

11 Q. So would it be fair to say that Section 5 of  
12 your report, you're not offering opinions, but you're  
13 explaining the parts of the process that helped form  
14 your opinions in the case?

15 A. That's fair.

16 Q. Next paragraph on 42, you reference the  
17 public's concerns regarding the nature of the town  
18 hall hearings. And then as a hyphen, they're being  
19 held before data and maps were published and the  
20 input only format constitute procedural departures  
21 from, if not past practice, then certainly from the  
22 mass of the public -- what the mass of the public  
23 viewed as best practices and good governance; right?

24 A. Yes.

25 Q. And we discussed, since the town hall format

1 was identical to the 2001 and 2011 hearings and the  
2 timing before maps were introduced was the same as  
3 the 2001 and 2011 hearings, you'd agree that the 2021  
4 hearings were consistent with past practice in  
5 Georgia; right?

6 A. Yes. And that wasn't necessarily the public  
7 coming forth and saying, Why are you doing it  
8 differently? It's saying, We still don't understand  
9 why it's being done this way.

10 Q. You also say that the committee ignored the  
11 vast majority of the input at that end of that  
12 section; is that right?

13 A. Yes.

14 Q. And so what methodology did you use to  
15 determine that the committee ignored the vast  
16 majority of the input from the public?

17 A. None of that in terms of what we see moving  
18 forward in this process -- well, it does not appear  
19 that their commentary was taken to heart in terms of  
20 any actual changes to the process.

21 For example, multiple people said, This  
22 turnaround after the maps have been published is far,  
23 far too short. Give us two weeks. Give us a week.  
24 Give us whatever amount of time to analyze these  
25 plans, to offer feedback on the plans themselves, on

1 the actual maps as opposed to just giving you input  
2 on communities of interest, for example. And that  
3 kind of feedback was not acted upon.

4 Q. So when you referring to ignoring a vast  
5 majority of the input here on page 42, that's the  
6 input about how the process should be conducted, not  
7 input about the maps; right?

8 A. Well, there actually was very little input  
9 in terms of -- well, I won't say "very little."  
10 There was comparatively little input in terms of line  
11 drawing. Although, there was that as well. And I  
12 think some of that was ignored, too, in terms of  
13 specific communities saying, Don't put us here, put  
14 us there, so...

15 Q. So that goes back to my question. In term  
16 of -- what methodology did you use to determine that  
17 input about specific line drawings is not reflected  
18 on the enacted plans?

19 A. Well, again, I would say that most of the  
20 feedback here is not about specific line drawing.  
21 Most of it is about the process.

22 And so even though these hearings are, you  
23 know, purportedly held to glean this mass of  
24 information about communities of interest and where  
25 lines ought to be drawn, that's -- there's not a lot

1 process -- well, not just a lot of times, every time  
2 that a map is published, the turnaround is very, very  
3 short. So it's not to say that there was zero  
4 ability to comment on the maps once they were out.  
5 It's that the timeline was far too rushed according  
6 to a great number of people.

7 Q. Do you know the cost to the state of Georgia  
8 for the General Assembly to be session each day of a  
9 special session?

10 A. No.

11 Q. So at the end of this section on page 69,  
12 you reference that the majority of the plan was voted  
13 out favorably with all black members of the committee  
14 voting no; is that right?

15 A. Yes.

16 Q. And that's the same as saying all the  
17 Democrats in the House committee voted no; right?

18 A. In this case, yes.

19 Q. When you were summarizing these various  
20 committee meetings, did you include every committee  
21 meeting that was held by the House and Senate  
22 committees during this special session at this -- up  
23 to this point?

24 A. I don't believe every single one. There may  
25 have been some shorter minor committee meetings that

1           you have a leader of a committee suggest  
2           that, perhaps, the application of the Voting  
3           Rights Act is unfair, that to me raises a  
4           flag.

5           BY MR. TYSON:

6           Q.   So is that the only comment that you  
7           identify that raises a flag of contemporary  
8           statements made by legislatures?

9           A.   That's the one that I found most  
10          significant.

11          Q.   And that's the comment on page 75 by  
12          Chairman Rich?

13          A.   Correct.

14          Q.   Are you offering the opinion that this  
15          specific sequence of events leading up to the  
16          adoption of the 2021 redistricting plans was racially  
17          discriminatory?

18          MR. DAVIS:  Objection to the extent it  
19          calls for a legal conclusion, but you may  
20          answer.

21          THE WITNESS:  It's my opinion that the  
22          sequence of events along with the history of  
23          discrimination that I discuss in the report  
24          and as part of this report as a whole would  
25          tend to lend credence to a finding of



1 discriminatory intent in the process.

2 BY MR. TYSON:

3 Q. So it's your opinion that someone could find  
4 that there was discriminatory intent in the process,  
5 but you're not saying there was discriminatory intent  
6 in the process; right?

7 A. I'm not drawing the legal conclusion which  
8 is left for the Court to do.

9 Q. So just so we're completely clear on this,  
10 you are not offering the opinion that there was  
11 discriminatory intent in the process. You're  
12 offering the opinion that evidence would support a  
13 finding of discriminatory intent?

14 A. Correct.

15 Q. So aside from the conclusion of your report  
16 at the very end, have we -- is it correct that the  
17 pages from page 8 where you begin historical  
18 background section through page 84 is the entirety of  
19 your opinions about the Arlington Heights factors in  
20 your report?

21 A. Yes.

22 Q. And barring new facts -- I want to set aside  
23 additional facts. But if there are no other new  
24 facts that arise, you are not planning to offer any  
25 further expert opinions about the Arlington Heights

1 legislative process?

2 A. Yes. Failing to account for public comment  
3 after the maps are published, refusal to allow access  
4 to the map drawing process and rushing the process in  
5 general and so on.

6 Q. So when you say failing to make time for  
7 public comments after maps were published at the last  
8 minute, you'd agree there was -- there were multiple  
9 committee meetings that allowed comments after the  
10 maps were published; right?

11 A. There were, but I would say those were in a  
12 very, very tight window of time where in some cases  
13 maps are published the day of and commentary is taken  
14 the day of, possibly the day after. So what people  
15 were asking for is a much larger window of time to be  
16 able to really systematically analyze those maps and  
17 provide substantive feedback.

18 Q. And you reference rushing the process. But  
19 you'd agree that the process was not rushed when  
20 compared to the 2001 and 2011 redistricting cycles;  
21 right?

22 A. Yes. But that would indicate to me it was  
23 also rushed in those cycles, as well, insofar voters  
24 want more time with the publication of maps.

25 Q. You say failing to account for minority

CERTIFICATE

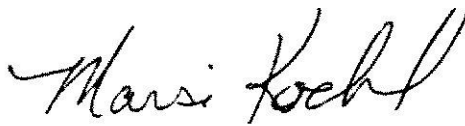
STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions, and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 20th day of March, 2023.



---

Marsi Koehl, CCR-B-2424

# EXHIBIT 13

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 Sometimes you can be on Zoom but the video is  
2 off so you can't see the other person.

3 A Yes, I think the video was on.

4 Q Okay, yeah.

5 Did you discuss prior maps -- I'll back up.

6 Excuse me.

7 On the LCRO website there is a September 27th  
8 Duncan-Kennedy Congressional map, as well as the enacted  
9 map, right?

10 A Correct.

11 (Court reporter clarification.)

12 Q BY MR. CANTER: Did you discuss the  
13 Duncan-Kennedy map with the chairman as well?

14 A Yes.

15 Q And you also discovered the ultimately enacted  
16 map?

17 A Yes.

18 Q And did you discuss drafts between the  
19 Duncan-Kennedy map and the enacted map?

20 A I'm sorry, can you say that again, please?

21 Q Sure.

22 Did you discuss different drafts of the map  
23 between the Duncan-Kennedy map and the enacted map?

24 A I believe so, probably.

25 Q And these discussions were sometimes in person,

1 sometimes over Zoom, and sometimes over telephone?

2 A Yes.

3 Q Any other ways you communicated?

4 A I don't think so.

5 Q Did you ever speak with anyone on Chairman  
6 Kennedy's staff?

7 A Yes.

8 Q Whom?

9 A Are you -- in specific or just ever spoke to?  
10 Because yes, I spoke with Ali Farmer.

11 Q That's --

12 A But not related to the content of the map.

13 Q That's fair. Thank you. I will rephrase the  
14 question.

15 A Okay.

16 Q In relation to the content of the Congressional  
17 map, did you ever speak with someone in Chairman  
18 Kennedy's staff?

19 A I received an e-mail from someone on his staff.  
20 I can't recall her name because I didn't speak with her  
21 much related to the map you referred to a moment ago, the  
22 first proposed Congressional map.

23 Q But mostly you were speaking with Chairman  
24 Kennedy?

25 A Correct.

1 Q The vast majority?

2 A The vast majority.

3 Q The same question about Chairman Rich. Did you  
4 speak with anyone on Chairman Rich's staff about  
5 developing the Congressional map?

6 A No.

7 Q You only spoke with Chairman Rich?

8 A Correct.

9 Q Did Chairman Kennedy and Chairman Rich provide  
10 final approval on the maps before they were made --  
11 sorry.

12 Did Chairman Kennedy and Chairman Rich provide  
13 final approval on the Congressional map before that one  
14 was made public?

15 A When you say "final approval," what do you  
16 mean?

17 Q Right before it was made public.

18 A But what kind of -- what do you mean by "final  
19 approval?" Just saying okay or something beyond that?

20 Q At this point just meaning they accepted it,  
21 and you needed their acceptance before it was made  
22 public?

23 A Yes.

24 Q Do you remember when that was?

25 A I don't remember the specific date.



1 Q Do you remember if that -- I'm going to call it  
2 final approval, but I hope you understand what I mean  
3 there. Do you remember if that final approval was in  
4 person or in some other -- over some other means?

5 A I don't recall specifically when that was  
6 given.

7 Q Did you ever e-mail with Chairman Kennedy about  
8 the Congressional map?

9 A It's possible that I did. I don't recall  
10 anything specific.

11 Q Primarily you were conversing in the ways we  
12 talked about before?

13 A Yes.

14 Q Is it the same with Chairman Rich?

15 A Yes.

16 Q E-mail is pretty common. Why didn't you  
17 e-mail?

18 A I just prefer to discuss things in person with  
19 him.

20 Q Can you elaborate on why you prefer that?

21 A Well, I also know that you don't want to e-mail  
22 a lot of documents and have things in e-mail as well. So  
23 it's much --

24 Q And why --

25 A -- easier.

1 Q I'm sorry.

2 A You create along a record when you do that, so  
3 it's much better to have that conversation in person.

4 Q I understand.

5 Approximately when did you first begin speaking  
6 with Chairman Kennedy and Chairman Rich about the  
7 Congressional map?

8 A Which Congressional map? The final version?

9 Q The final Congressional map.

10 A I'm not sure of the date that we began talking  
11 about that.

12 Q How about, when did you first begin speaking  
13 with Chairman Kennedy and Chairman Rich about any draft  
14 of the Congressional map?

15 A Chairman Kennedy and I spoke, I think it was  
16 in -- Chairman Kennedy and I spoke, I believe in  
17 September at some point, regarding the initial  
18 Congressional District map draft that was the one that  
19 you referred to on our website. I don't recall  
20 specifically when a Congressional map discussion came up.  
21 The initial focus was to start with the -- the House and  
22 Senate, so --

23 Q Yeah.

24 A -- I don't recall when in that process we began  
25 to talk about congressional.

1 Q We will get to the House and Senate  
2 momentarily.

3 A Yeah.

4 (Court reporter clarification.)

5 Q BY MR. CANTER: You said a moment ago that you  
6 spoke with Chairman Kennedy about the September map at  
7 some point in September.

8 A Uh-huh.

9 Q Did he draw the September map?

10 A No.

11 Q Why is it called the Duncan-Kennedy map? Does  
12 the "Kennedy" refer to Chairman Kennedy?

13 A Yes.

14 Q Then why is it called the Kennedy map?

15 A I didn't call it that. It has a plan name, so  
16 I don't know who calls it that.

17 Q Got it.

18 A I think they released a press release, so that  
19 may be why they started calling it that way. I'm not  
20 sure why --

21 Q Okay. Fair enough.

22 A -- they refer to that. But maps that are from  
23 our office have to have legislative sponsorship, so they  
24 do have to come through a member of the General Assembly  
25 in order to draw one, so...

1 Q Sure. Okay. That makes sense.

2 Did Chairman Kennedy have any opinions about  
3 the September map?

4 A Opinions in what way?

5 Q About the composition of the districts in the  
6 September map.

7 A Before its creation or after?

8 Q Before its creation.

9 A Yes.

10 Q Do you remember those?

11 A Not well enough to tell you what they were, but  
12 did he have them, yes.

13 Q Do you think that if we look at documents for  
14 specific districts later, you would be able to recall  
15 some of them?

16 A Possibly, because I know there was a document.  
17 Like I said, the staff person e-mailed me related to  
18 that.

19 Q Just so I understand, a staff member on -- one  
20 of Chairman Kennedy's staff members e-mailed you about an  
21 early draft of the Congressional map?

22 A Yes.

23 Q And maybe looking at that document would  
24 refresh your recollection on what he --

25 A Yes.

1 Q The same with Chairman Rich. Did you speak  
2 with Chairman Rich about the early drafts of the  
3 Congressional map?

4 A Are you referring to the --

5 Q September version.

6 A No, I did not.

7 Q Did you speak with Chairman Rich about any  
8 other drafts of the Congressional map?

9 A The versions that came later on, yes.

10 Q And did she have opinions about them?

11 A I'm sure that she did. I don't recall what  
12 they were.

13 Q Do you think looking at documents for specific  
14 districts would help refresh your recollection?

15 A Possibly so.

16 Q You mentioned that you also spoke with  
17 Mr. Tyson about the Congressional map --

18 A Yes.

19 Q -- is that correct?

20 What did you guys discuss?

21 MR. JAUGSTETTER: I'm going to assert an  
22 objection. Mr. Tyson served as counsel to Ms. Wright,  
23 and I am -- I'm going to instruct her that she can answer  
24 as to topics but not the substance of those  
25 conversations.

1           Let me rephrase. Did you ever speak with the  
2       three of them at the same time?

3           A    Yes.

4           Q    And were those conversations ever in person?

5           A    I can't say specifically. Possibly so. There  
6       was a lot of in and out and meetings in the office, so  
7       it's possible that there was one in person.

8           Q    Were you looking at maps when you were speaking  
9       together?

10          A    Yes.

11          Q    And that's all of those that --

12          A    Pretty much what I do.

13          Q    All right. Yeah.

14               Is there anyone else that -- let me back up.

15       You said you drew the Congressional map?

16          A    Yes.

17          Q    And you drew it with Maptitude?

18          A    Yes.

19          Q    And you've mentioned speaking with Chairmans

20       Kennedy and Rich and Mr. Tyson about drawing the

21       Congressional map?

22          A    Yes.

23          Q    Is there anyone else that you spoke with?

24          A    So in terms of the group meeting-type thing,

25       there was a meeting that involved the Speaker of the

1 House at the time, Speaker Ralston, and Lieutenant  
2 Governor Duncan, and some of their staff.

3 Q Including group conversations, is there anyone  
4 else that you spoke with about the Congressional map in  
5 addition to Speaker Ralston, Lieutenant Governor Duncan,  
6 and their respective staff?

7 A With a specific memory of having that  
8 conversation, no, I don't clearly recall having a  
9 conversation. That's not to say -- there were a lot of  
10 conversations happening, so...

11 Q Were there any -- let me know if this question  
12 doesn't make sense, but were there any persons that were  
13 representing an organization or an entity that you spoke  
14 with? So maybe you weren't speaking with them in their  
15 personal capacity, but you were speaking with an entity  
16 and they were speaking on the entity's behalf.

17 So if I was speaking with you on behalf of the  
18 law firm I work at, is it possible -- and you maybe  
19 weren't considering you were talking to me in my  
20 individual capacity, but you were talking to me in my  
21 sort of capacity representing the entity.

22 A Are you talking about in the formation of that  
23 map specifically?

24 Q Regarding the formation of the Congressional  
25 map.

1           A    No.   We would typically defer someone to a  
2   legislator to do that if they wanted to bring something  
3   to us regarding drawing a map.

4           Q    So just to be clear, you never spoke with  
5   anyone in that sort of representative capacity?

6           A    I don't recall that.

7           Q    Anyone in your office?

8           A    I couldn't speak to that.   I don't recall that  
9   they did either.   They know that most map drawing that we  
10   do comes through a member.   We might provide information  
11   to some of their staff.   I know we did provide  
12   information to some of the Democratic Caucus staff  
13   members from time to time.   But as far as going into the  
14   formation of that map, I don't recall any conversations  
15   with staff members.

16                   (Court reporter clarification.)

17           Q    BY MR. CANTER:   You mentioned speaking with  
18   Speaker Ralston about in relation to drawing the  
19   Congressional map?

20           A    Yes.

21           Q    Do you recall those discussions?

22           A    It was a group discussion, so it was a -- a  
23   Zoom call meeting.

24           Q    When did it occur?

25           A    I do not know the date.



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 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           A    Other than counsel that -- I don't know if you  
2   consider that part of the General Assembly or not. I  
3   don't recall.

4           Q    You don't recall or you didn't?

5           A    I don't believe that I did.

6           Q    Okay. And that includes not speaking with  
7   anyone that's representing an organization or an entity?

8           A    Right.

9           Q    Yeah. I'm just trying to draw a distinction  
10   between speaking with persons and I spoke with this  
11   group.

12          A    Well, we do get a lot of requests for  
13   information, so it's -- it's kind of hard to say. As far  
14   as what we were working on in the map during the process  
15   of drawing the map is a little different, because that  
16   was all after the public hearings, so we had already  
17   taken feedback through the public hearings. The comment  
18   portal was available during that time. So there was  
19   information that was there. I wouldn't have time to  
20   spend a lot of time reading them, but I did do it  
21   sometimes, and so you're trying to incorporate a lot of  
22   input. So I didn't speak with those people but heard  
23   from a lot of groups and people.

24          Q    You got a lot of input on what the  
25   Congressional State Senate and State House maps should

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 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 about earlier that I was on Zoom, and we worked on the  
2 map, the Congressional map, and that --

3 Q So --

4 A -- was discussed in that meeting to increase --  
5 (Zoom interruption.)

6 THE WITNESS: Okay. I don't know --

7 MR. JAUGSTETTER: Keep going.

8 THE WITNESS: Okay. What was I saying? The  
9 meeting. Yes, that was discussed in the meeting, to add  
10 that into District 6 to further -- to further increase  
11 the Republican percentage in that district.

12 Q BY MR. CANTER: I believe that meeting included  
13 Chairmans Kennedy and Rich, Mr. Tyson, Speaker Ralston,  
14 Lieutenant Governor Duncan, and some of the Speaker and  
15 other Governor staff, right?

16 A Yes, that's correct.

17 Q Do you remember who directed you to add Dawson?

18 A If I recall correctly, I think it was Speaker  
19 Ralston.

20 Q Did he provide a reason?

21 A As mentioned, the discussion was about the  
22 Republican percentage of the way the district would vote,  
23 so that was what was being looked at and discussed as it  
24 was -- as we were trying that out.

25 Q I believe you said that a map was up on the

1 screen during this conversation?

2 A Yes.

3 Q Was demo -- demographic data reflected on the  
4 screen as well?

5 A Yes. There would have been demographic, as  
6 well as political. I'm not sure how clearly they could  
7 see that from where they were and the way that it was  
8 projected, because I wasn't there with them, but it would  
9 have been on the screen for -- while we were doing it.

10 Q Do you know if there was data reflecting the  
11 race of citizens in the different districts on the  
12 screen? Was it racial data --

13 A What do you mean?

14 Q Yeah, was it racial data reflected on the  
15 screen?

16 A Yes.

17 Q Yeah, it doesn't mean you had demographic,  
18 yeah.

19 A Racial data, as well as political data.

20 Q I'm sorry. I might have misheard you.

21 A Yes.

22 Q Thank you for that confirmation.

23 Did you literally make the change to Dawson  
24 during that meeting?

25 A Yes.

1 Q And did the data change on the screen when you  
2 made it?

3 A The data would change when you --

4 Q Yeah, yeah.

5 A -- change the map, yes.

6 Q So the -- the members -- the participants in  
7 the meeting on the other side of the Zoom at least could  
8 have seen the changes in the numbers?

9 A They could have. The pending change box that  
10 shows up, I don't know if you are familiar with  
11 Maptitude, but it will only show the changing number  
12 while you have the selection highlighted.

13 Once you click that into the district or make  
14 that change, then it switches to the new. You then can't  
15 see the previous. You are not seeing both at the same  
16 time.

17 Q Yeah, no, I know what you mean.

18 A Yeah.

19 Q So when you were about to change -- when you  
20 were about to add Dawson to CD 6, you could see the  
21 racial composition of Dawson under the September map next  
22 to the racial compo- -- I'm sorry, the racial composition  
23 of CD 6 on the September map next to the racial  
24 composition of CD 6, or would it change --

25 A No.

1 Q Okay.

2 A It's going to show the two districts. So  
3 whichever district you are moving it out of and the  
4 district you are pushing it into, it's going to show the  
5 new number for what that would be if you moved -- if  
6 you --

7 Q Okay.

8 A -- clicked that, made that change.

9 Q So right before making -- right before adding  
10 Dawson into CD 6, they are able to see what the new  
11 racial composition of CD 6 would be?

12 A Right. They would see the new number. They  
13 wouldn't see the previous --

14 Q Right.

15 A -- at that point.

16 Q Yeah. But before adding that, you would have  
17 seen the previous --

18 A Right.

19 Q -- composition? Okay.

20 A You could have, yes.

21 Q Yeah, yeah, if they looked.

22 A If you are looking, yeah.

23 Q Yeah, right. And then you click it, and it's  
24 added?

25 A It switches.

1 Q Yeah.

2 Was the discussion just, let's add Dawson, or  
3 was there anything more specific about that? It looks  
4 like the entirety of Dawson County was added.

5 A Yes. We moved -- both those two counties were  
6 in -- added in whole. Of course, trying to divide  
7 counties was not -- as we talked about earlier, it poses  
8 problems with elections and whatnot, so trying to limit  
9 the splitting of counties.

10 I think there was discussion about the fact  
11 that Georgia 400 runs up through that district, so there  
12 is a common road traveling through there, as far as those  
13 areas being together, but the -- there was a lot of  
14 discussion going on. Again, I wasn't in the room, so  
15 it's...

16 Q Could you hear what was in the room?

17 A I could, but again, I'm looking at other things  
18 while they are discussing --

19 Q I see.

20 A -- what they are doing.

21 Q So based on your knowledge -- I understand you  
22 couldn't necessarily hear everything, but based on your  
23 knowledge, was there any other factors that were  
24 considered in the room when deciding to add Dawson County  
25 to CD 6?

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 Q You heard some comments, right?

2 A Right. If the people that spoke at -- at the  
3 committee meetings would have said, there were those who  
4 spoke about that.

5 Q Do you recall any of those comments that were  
6 at the committee meetings to be about CD 14?

7 A That's what I am saying. If I had heard  
8 anything, it would have been -- it would have been in  
9 those comments, were the only ones that I heard.

10 Q And what were those comments?

11 A That the people in that area did not want to be  
12 in the 14th District.

13 Q Okay. So you have heard that?

14 A I heard that in those meetings, yes.

15 Q Okay. After you heard those comments, did you  
16 have any discussions with the people who were present at  
17 the working group, over the Zoom, about changing the map  
18 to take Austell and Powder Springs out of CD 14?

19 A I don't recall a discussion after that about  
20 that area.

21 Q Were there any discussions about changing  
22 Congressional map after the final map was published?

23 A I don't recall there being discussion about  
24 making changes once that version of it had dropped.

25 Q Okay. So there were committee meetings where



1 there was public hearings about the map, but no changes  
2 were made to the map after those hearings took place?

3 A So there was an original version, and then  
4 because there was a Congress prop, I think that was  
5 dropped. I can't remember the specifics, but they did, I  
6 think, make some adjustments. It's all kind of a blur to  
7 me now. I don't remember exactly the steps or when it  
8 happened.

9 Q But the primary amount of the work occurred  
10 before those committee hearings where people talked about  
11 CD 14?

12 A Right. They happened after the public  
13 hearings, but then after the --

14 Q There's additional meetings?

15 A Right.

16 Q Did you use the information that was included?  
17 Did you -- what did you do with that information that you  
18 heard at the meeting that occurred after it was  
19 published?

20 A That information, they are speaking to the  
21 members of the committee, and so I -- I work at the  
22 leisure of the members of the committee. So had the  
23 members of the committee requested that I do something  
24 with that information, then I would have.

25 Q It doesn't seem like they requested anything?

1           A    (No oral response.)

2           THE REPORTER: Did you answer?

3           THE WITNESS: Oh, sorry. No.

4           MR. CANTER: Yeah, I'm sorry. I need to do  
5 better about asking you to say yes or no and not say  
6 uh-huh.

7           So I apologize for that, Marcie.

8           Q   BY MR. CANTER: Would you agree that the  
9 residents of Austell and Powder Springs did not have an  
10 opportunity to elect candidates of choice -- of their  
11 choice when added to CD 14?

12          A    Can you say that one more time?

13          Q    Yeah. Would you agree that the residents of  
14 Austell and Powder Springs did not have an opportunity to  
15 elect candidates of their choice after their cities were  
16 added to CD 14?

17          A    They would have been able to vote for a  
18 candidate of their choice when they vote. That --  
19 that --

20          Q    Sure.

21          A    -- is hard to --

22          Q    Sure.

23                So would you agree that the residents of  
24 Austell and Powder Springs did not have a likely chance  
25 to elect candidates of their choice once their cities

STATE OF GEORGIA                   )  
                                       )       ss:  
COUNTY OF DEKALB               )

I HEREBY CERTIFY that the foregoing transcript was taken before me; that I was then and there a Registered Professional Reporter and Registered Merit Reporter, License No. 6595-1471-3597-5424 for the State of Georgia, and License No. 14315 in the State of California; that the witness before testifying was duly sworn by me to testify to the whole truth; that the questions propounded by counsel and the answers of the witness thereto were taken down by me in shorthand and thereafter transcribed under my direction; and that the foregoing pages contain a full, true, and accurate transcript of all deposition testimony and proceedings had, all done to the best of my skill and ability.

I FURTHER CERTIFY that I am in no way related to, nor employed by any of the parties hereto, nor am I in any way interested in the outcome.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

DATED at Dunwoody, Georgia, this 8th day of February, 2023.

MARCELLA L. DAUGHTRY, RPR, RMR  
GA License No. 6595-1471-3597-5424  
CA CSR 14315

# EXHIBIT 14

## Georgia House District Map Introduction

### **Process for drawing plans**

- With the Census data delayed, we used the summer to study and learn about districts.
  - That was incredibly helpful to me to learn about the districts and the state.
  - Example of one or two that was helpful
- Between June and September, I sent out **4** separate invitation emails and allocated over **88 hours** to meet with members of both political parties to learn about their districts and the areas they wanted to gain or lose.
- We held public hearings across the state and took input on our website. We drove over 1400 miles around the state and held **11 public hearings** over **15 hours**, we heard from 328 speaking participants from 162 of our 180 House Districts.
- Also invited written commentary. Our website portal received over 700 comments, and we made those available to the committee members and the public and I personally reviewed them. You have a copy of those public comments in front of you.
- 1<sup>st</sup> Committee Meeting was an education day for the committee and invited a variety of groups to speak to us about what we should know. We heard from NCSL, the Georgia Democratic Party, Fair Districts, among others.
- Our committee then adopted guidelines to govern the drawing of maps. Those guidelines focused on the constitutional requirement of equal population, compliance with the Voting Rights Act, including a recognition of racially polarized voting, and then the importance of jurisdictional boundaries, prioritizing communities of interest, compactness, and contiguity.

## **Constitution**

- Our first responsibility is to balance population under the US Constitution.
- Applied 2020 data to the existing districts. Found that districts were over or under population by -24.39% to +32.27%.
- Districts have to be substantially the same size, and we've generally drawn to a deviation of +/- 1.5% on the draft plan.

## **Voting Rights Act**

- After overlaying the census data, we drew the VR districts, in consultation with counsel, to ensure compliance.
- We comply with the Voting Rights Act, creating majority-minority districts and new minority opportunity districts.
- 48 districts that are majority AP Black VAP (up 1 from existing maps)  
78 minority opportunity districts (majority non-white VAP) (up 5 from existing maps)
- One Latino majority VAP district (District 98)
  - Two heavily influenced Latino districts (>40%) Districts 4 and 96.

## **Communities of interest and county splits**

We also applied the remaining Guidelines adopted, prioritizing county lines, municipalities (something we hear about a lot in public commentary), communities of interest, compactness, and contiguity.

- The 2001 House Districts drawn by Democrats split 80 counties into 147 districts for 180 members while using a deviation of +/- 5%.
- Our current districts split 73 counties.
- This plan splits only 68 counties while using a deviation of +/- 1.5%.
- In contrast, Democrat plan offered today splits 79 counties.

## **Incumbents**

- We obtained current incumbent addresses so we could plot and overlay them onto the map. We prioritized minimizing incumbent pairings as much as possible.
- No one is happy about pairings, but our plan only pairs incumbents where population deviations required and there were no other workable solutions.
- The 2001 House district plan paired 37 of the 74 Republican incumbents but only nine of the 105 Democrats.
- Our current maps maintained most incumbents, only 5: 2 Ds, 2Rs, and one D-R.

Combined all of this input with the staff at the Reapportionment office to get to a draft map and that is what you have in front of you.

### **One final point I want to make:**

**Minority Opportunity Districts are not an ideal that is held by just one party. The Republicans have seen and embraced the growth in Georgia; in fact, our goal with our fiscal policies is to encourage that growth, and we are thrilled it is here.**

**As a female R from one of the fastest growing and most diverse counties in the state, one of the things I'm most proud of is the # of Minority Opportunity Districts we've drawn.**

So let's look at the map. Will walk through by region --

**Southwest:**

Loss of pop; whole district. Protected VR districts in **HDs 153 and 154**.  
Resulted in one of our inevitable pairings, a R-D.

With the collapse of that one district, we were able to maintain the cores of the remaining districts in the area.

**Moving east ... Central South:**

Protected **HD 177** there, which is a VR district. Were able to accommodate the request of the Democrat incumbent there to include some precincts he explained to us were a part of the district's community of interest.

Also in this area the pop loss resulted in another pairing, this time R-R (Lariccia / Burchette) in **HD 176**.

Swamp area of the state in **HD 174**, we kept together among 5 counties.  
Comm of Int.

**Coastal:**

**HD 180** has whole of Camden county – removed the split.

**HD 168** is wholly contained in Liberty County – Our Dean of the House keeps his famous district #.

**Savannah area:**

Protected one VR district: **HD #165** and two Minority Opportunity districts, **HD #s 162 and 163**.

**Southeast, but moving back west across the state:**

Kept a community of interest together – **HD #156** – kept Wheeler, Montgomery, & Toombs together – strong public request and support for this at our public hearings.



### **Moving up a bit to Central Georgia**

Maintained the core of the districts in the Macon area while protecting 3 VR districts there – **HD #s 142, 143, and 150.**

Also maintained greater than 50% black VAP in **HD # 137** by putting it into Lagrange and Troup County.

Moving west, protected 2 VR districts in Columbus area, **HD #s 140 and 141.**

### **Moving up a bit to South Metro:**

W/ loss of pop in SW GA below it and VR districts to the north of it, this area felt a crunch – pulling the VR districts a little further south.

### **Northwest Ga:**

Maintained district cores and avoided incumbent pairings, which is diff from Dem plan, which had at least one incumb pairing.

**Moving a little east, Pickens County** is whole under our current HD maps, and, based on clear requests and support from their communities, we kept it that way.

**Northernmost** area of state: **HD #7** – Is a perfect district and remains a perfect district.

### **Moving down a little to Athens/Clarke County:**

A lot of growth; very large county. Pop alone requires it be split 3 ways in a vacuum – like Barrow and Jackson, other large counties in the area that also got split. Always prefer to split larger counties before smaller ones.

### **Moving to the east, to the GA/SC border:**

Legislators from the area worked together to adjust their lines based on population and communities of interest.

**Moving down the border to the Augusta area:**

Protected 5 VR districts: **HD #s 128, 128, 130, and 131**. As requested by Dem incumbent, made Jefferson County whole.

**Metro Atlanta:**

Pop growth; densely populated; many incumbents live close together; worked hard to avoid pairings.

North Metro: Pop growth in **Bartow, Cherokee, and Forsyth** pulled the districts in these areas to the east.

**Gwinnett County:**

Tremendous growth; created 2-3 Minority Opportunity Districts here alone; 2 pairings, still looking into some possible solutions for those.

**Again reiterate that I am proud of the diversity we enjoy in my home county, and I am proud of my colleagues, who, through these maps, also embrace and celebrate our diversity with the creation of our Minority Opportunity Districts.**

# EXHIBIT 15

## **2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE**

### **I. HEARINGS AND MEETINGS**

#### **A. PUBLIC HEARINGS**

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, [www.legis.ga.gov](http://www.legis.ga.gov)

#### **B. COMMITTEE MEETINGS**

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

### **II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS**

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

### **III. REDISTRICTING PLANS**

#### **A. GENERAL PRINCIPLES FOR DRAFTING PLANS**

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

#### **B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE**

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
  - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
  - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
  - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
  - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

#### D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

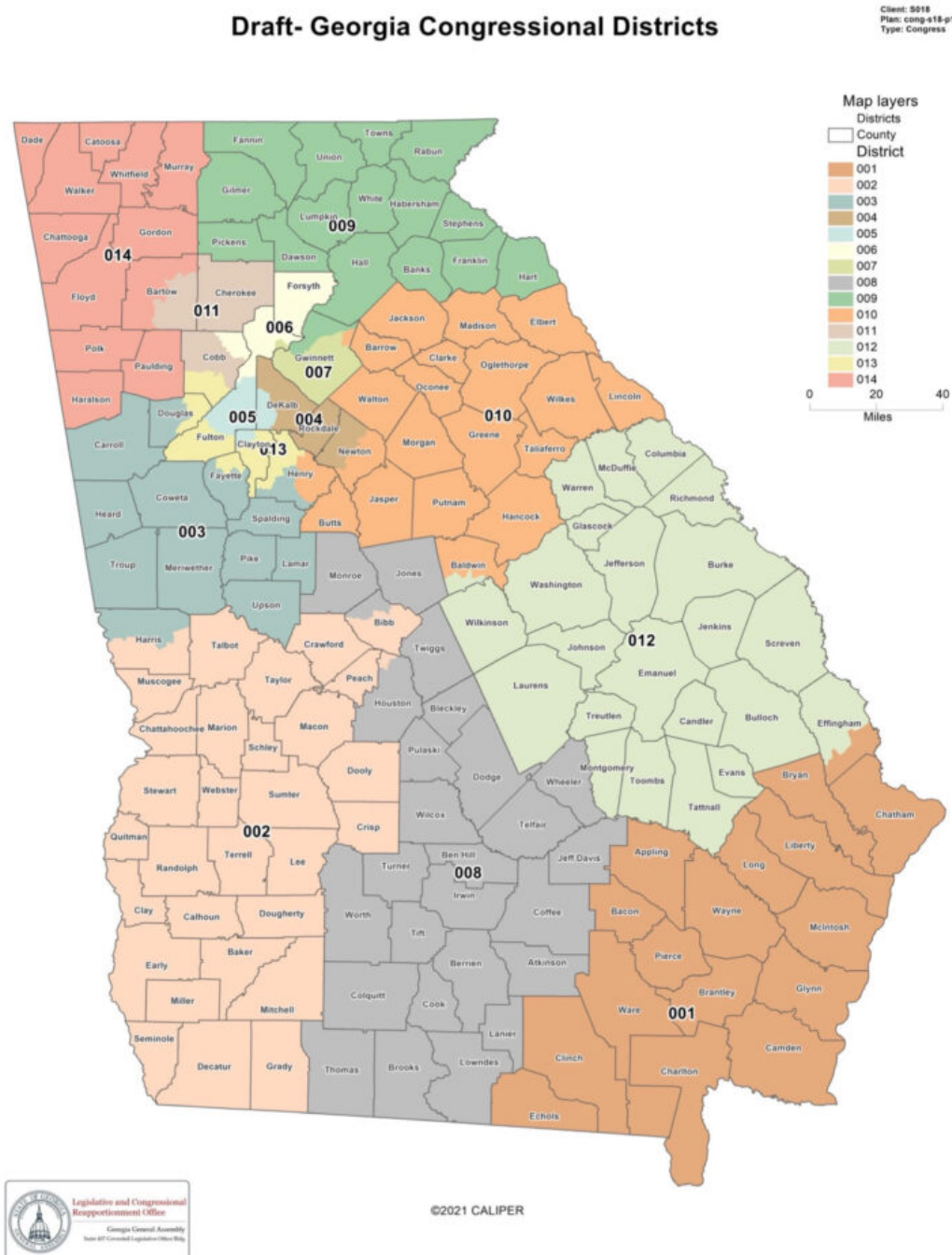


# EXHIBIT 16



# Georgia Senate releases first proposed congressional redistricting map

by Dave Williams | Sep 27, 2021 | Capitol Beat News Service



The Georgia Senate has released a proposed congressional redistricting map.

ATLANTA – The General Assembly's special redistricting session doesn't start until November, but the first map of redistricting season was released late Monday.

Lt. Gov. Geoff Duncan, who presides over the Georgia Senate, and Sen. John Kennedy, chairman of the chamber's Redistricting and Reapportionment Committee, put out a proposed congressional district map that would increase the size of districts in rural South Georgia to reflect losses in population during the last decade.

The plan crafted by the Senate's Republican majority also appears to target U.S. Rep. Lucy McBath, D-Marietta, by shifting portions of the 6<sup>th</sup> Congressional District she represents into heavily Republican areas.

Duncan defended the proposed map as in keeping with guidelines the Senate committee set last month.

"This map not only meets principles of redistricting, but we are proud to present a map that regardless of political party, Georgians can be proud of," the lieutenant governor said. "Ensuring that any maps we produce are fair, compact, and keep communities of interest together will continue to be of utmost importance."

Georgia lawmakers redraw the state's legislative and congressional districts once each decade to account for changes in population reflected in the U.S. Census. Special redistricting sessions usually take place during the late summer, but the process was delayed this year because of the impact the coronavirus pandemic has had on completing and releasing the census.

A preliminary look at the Senate's proposed congressional map shows Georgia counties south of Interstate 20 would gain huge swaths of territory to compensate for population losses since the 2010 census. Federal law requires congressional districts to be virtually equal in population.

The 2<sup>nd</sup> Congressional District in Southwest Georgia, which now includes only part of Muscogee County, would expand to take in the entire county, as well as portions of Harris and Houston counties now part of other districts.

But perhaps the most dramatic changes would take place further east, where some districts would in essence swap counties. The 8<sup>th</sup> Congressional District in the south-central portion of the state would add Coffee, Jeff Davis and Wheeler counties while losing Wilkinson and Wheeler counties and parts of Houston and Lowndes counties.

The 10<sup>th</sup> District would lose northern Columbia County, southern Baldwin County and all of McDuffie and Warren counties, while moving further north to gain Elbert, Jackson and Madison counties, and absorb all of Athens-Clarke County. Currently, the 10<sup>th</sup> District does not include the northern portion of Athens-Clarke.

The 12<sup>th</sup> Congressional District, which borders the 10<sup>th</sup> to the south, would shift northward to take in the part of Columbia County it does not contain now as well as all of McDuffie, Jefferson, Washington and Wilkinson counties. On its southern end, the 12<sup>th</sup> would lose Coffee, Jeff Davis, Appling and Wheeler counties.

Democrat McBath captured the 6<sup>th</sup> Congressional District in Atlanta's northern suburbs in 2018 after it had been in Republican hands for decades, then won reelection last year.

But holding the seat would become harder in 2022 under the Senate map, which would put all of heavily Republican Forsyth County inside the 6<sup>th</sup> District for the first time. The district would retain East Cobb and North Fulton but lose northern DeKalb County.

Similarly, Democratic Rep. Carolyn Bourdeaux could face a new obstacle under the proposed 7<sup>th</sup> Congressional District Senate map. While the district would lose Forsyth County to McBath's district, the

Republican-dominated 9<sup>th</sup> Congressional District in North Georgia would dip down into northern Gwinnett County, uncomfortably close to and possibly even including Bourdeaux's residence.

Even if Bourdeaux's home ends up outside of her district, however, she would be allowed to run for reelection next year. Federal law does not require members of the House to reside in their districts.

The special session will begin on Nov. 3 and is expected to run into the week of Thanksgiving.

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# EXHIBIT 17

**From:** Patrick Jaugstetter <patrickj@jarrard-davis.com>  
**Sent:** Friday, April 14, 2023 1:09 PM  
**To:** Love, Cassandra  
**Cc:** Bryan Tyson; Common Cause Raffensperger; Jack Genberg; Poy Winichakul; Canter, Jacob; Alexander Davis; Julie Houk; David Rollins-Boyd; EXT\_Ezra Rosenberg; Matletha Bennette; GA-Redistricting; Story, Shawn Marie; Alex Khoury; Taing, Howe; Bryan, Clair  
**Subject:** Re: Outstanding Discovery Items  
**Attachments:** OLC-Redistricting Proposed Searches .xlsx

[EXTERNAL EMAIL]

Cassandra:

We have completed a review of the matters raised in our recent conference – our responses to the each of the outstanding matters are set forth below in red:

1. Any communications with and documents generated by Taylor English in their capacity as advisor to the legislature in the summer and fall of 2021.  
RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

You confirmed that all responsive Taylor English documents and communications have been produced or logged.

2. Emails and text messages between Representative Jan Jones and Chairman Bonnie Rich or Chairman John Kennedy, specifically in the summer and fall of 2021.  
RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

As we indicated to you on Tuesday, despite Rep. Jones's deposition testimony that these communications occurred, we have not been able to locate these documents within the production, nor on the privilege log. You confirmed that you will check to see whether these have been produced, and if they have, you will provide the BATES numbers of these documents. If not, you will confirm that these no longer exist in Rep. Jones, Chairman Rich, or Chairman Kennedy's possession, custody, or control, nor are they retained in any records held by the LCRO.

RESPONSE: We have identified the text messages between Rep. Jones and Rep. Rich. We collected those from their respective cell phones. The messages as retrieved from Rep. Rich's phone were part of the records submitted to the Court for in camera review and ultimately produced. Upon collection of Rep. Jones' text messages, communications between Rep. Jones and Rep. Rich were produced. Those text message communications can be found at Bates No. LEGIS00011165 and LEGIS00024578. We found no responsive text messages between Senator Kennedy and Rep. Jones. All responsive email communications between and among these members have been produced and have been identified by sender and recipient – that information should be sufficient to identify the records you seek.

3. The folder referenced by Senator Mike Dugan in his deposition that was provided to all members of the Senate Committee, including all contents therein.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

As we indicated on Tuesday, we do not have this folder in the production. You confirmed that you have checked with all members who received individual subpoenas, as well as their staff, and with the LCRO itself but none of those individuals (i) retained a hard copy folder, (ii) retained an electronic copy of the folder, (iii) nor remembers what was included inside the folder.

RESPONSE: None of the Subpoenas issued to the General Assembly witnesses requires that these particular records be *separately* identified. We have previously produced all records responsive to the Subpoena, however, in order to assist you in identifying the records described in Senator Dugan's testimony, we offer the following:

Senator Dugan testified that he recalled seeing between five and ten maps in a folder provided to him during a committee meeting by the Chairman's assistant and that he believed those maps were public documents, though he could not recall where they were published. Below are the Bates numbers for the draft senate district maps that were provided to the committee members in their folders. We were able to match up the hard copy maps with the versions posted on the General Assembly's website. These are all of the maps we identified that match Sen. Dugan's description in his deposition:



Hard Copy Maps Provided to Committee Members	Website Electronic Copy
LEGIS0000097	LEGIS0001328
LEGIS0000098	LEGIS0001329
LEGIS0000099	LEGIS0001330
LEGIS0000100	LEGIS0001331
LEGIS0000114	LEGIS0001340
LEGIS0000115	LEGIS0001341

Finally, Sen. Dugan testified the committee was “versed on” Sec. 2 of the Voting Rights Act during “the process,” and he referenced a document in his folder describing the “contents” of Section 2. We have previously produced several documents that match this description. See: LEGIS00000076; LEGIS00001599-LEGIS00001608; and LEGIS00001616-LEGIS00001623.

4. All drafts of the Congressional, Senate, and House maps.

RESPONSE: Subject to the exception referenced below with respect to draft maps in member files, all draft maps in the possession, custody or control of the recipients of the subpoenas have been produced.

You confirmed that with Monday’s production of an additional 10 map files, found in members’ individual folders, we now have all draft maps. As we discussed in the call, the map files that were produced are unreadable. Upon further review, it looks like the map image files were not produced, rather the files seem to only contain metadata. Can you please reproduce these maps with the image files? .shp format would be extremely helpful, if possible.

Further, as we discussed, we appear to have *no* draft maps, outside of the Democratic caucus map, for the Congressional districts. You confirmed that there are none. And, despite Mr. O’Connor’s deposition testimony that there are likely dozens of draft maps, those produced for the senate and house districts are sparse. As we indicated in our call, Plaintiffs remain concerned that other relevant materials—communications, documents, maps, or otherwise—may have been overlooked in collection and production in light of the fact that these 10 map files likely would have never been produced if a witness had not referenced them specifically in deposition testimony almost a year after the subpoenas were issued. In working toward alleviating that concern, we requested information regarding which devices and platforms were collected from, and how that collection was completed—*i.e.* whether members ran their own searches, or whether a forensic collection was completed. We would appreciate this information being provided so that we can assess whether there are outstanding or additional discovery concerns in light of the collection process, or whether we can narrow our outstanding disputes. Please also confirm the search terms used for the second batch of subpoenas (the October 2022 subpoenas) that were utilized in collection and production. We have previously requested this information, but are lacking a response.

RESPONSE: As noted above, and at your request, we have created and are producing the 10 additional maps in .shp format. You will receive these files shortly. Further, we have confirmed that all draft maps have been produced and that the Maptitude program does not have a function that automatically saves work in progress or maintains “cached” files, “temp” files, or other files showing work in progress. We are confident that with the creation and production of these last 10 maps, all documents and files responsive to the Subpoenas have been produced.

5. All information or data from Maptitude that was used to draft the Congressional, Senate, and House maps, including all draft maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

6. All computer files related to drawing the Congressional, Senate, and House maps, and/or related to Maptitude.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

7. All overlays that were created to overlie any data set onto any proposed, draft, or enacted maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

8. All communications relating to suggestions or directions for changes to any version of the congressional map.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipient of the Subpoenas have either been produced or identified in a privilege log.

With respect to number 8, please confirm that all legislators’ personal emails were collected from in addition to their legislator emails, as well as personal cell phones and computers. We noticed, for example, that there are a couple of personal email addresses referenced in certain documents that were produced. We want to ensure a full collection & production in this vein.

RESPONSE: With respect to each member subject to a subpoena, we collected responsive communications from such members’ official and personal email accounts and their personal mobile devices and conducted searches pursuant to the search terms agreed upon by the parties. (The search terms are attached hereto for your reference).

With respect to numbers 5-8 and specifically Maptitude, we subpoenaed and still desire any data files that are stored there, including temporary data files, cache data, overlays, autosaved files, etc. For example, we seek any data that relates to maps and data viewed or created by legislators or staff during the Redistricting Process, including files that may relate to versions of maps or layers of data that were constructed or created that could then be viewed in Maptitude. This also includes the statistics created

as members or staff changed boundary lines in working sessions to the extent such data is captured in Maptitude. You shared that while your clients likely collected the files responsive to Plaintiffs' subpoenas from Maptitude themselves, they are not experts in Maptitude even though they utilize that system. You further expressed that this is likely why the ten new draft map files were not previously identified, and you expressed concern about your clients' ability to locate other types of data stored in Maptitude, and capture that data for production. For the reasons expressed on our call, this is concerning—your clients failed to identify and turn over 10 draft map files, and we are unsure what other files may have failed to be identified. We are happy to keep lines of communication open while you complete the process of adequately searching, collecting from, and producing Maptitude files, but we will need to have an understanding, as noted above, regarding how the collection process occurred and what safeguards are being utilized to ensure full compliance with Plaintiffs' subpoenas. While you suggested that it is Plaintiffs' responsibility to specify the information we seek, we have met that obligation through the different demands listed out explicitly in our subpoenas—it is incumbent upon your clients to comply.

**RESPONSE:** As noted above, and at your request, we have created and are producing the 10 additional maps in .shp format. You will receive these files shortly. Further, we confirmed again that all draft maps have been produced.

As we discussed on Tuesday, some of the information we seek, and are lacking, was referenced in deposition testimony.

**RESPONSE:** We have reviewed the deposition testimony referenced in your email message on April 1, 2023. Each of those excerpts relate to reports that could be created or data that that could have been made available. However, the deposition testimony further confirms that reports of the type referenced in the excerpted testimony were not, in fact, created and distributed to any member during the time period relevant to the Subpoenas. As we have previously noted, the data used to create the maps consisted of the 2020 Census Data (and the Secretary of State's election data (which have been produced and are publicly available)).

Finally, we understand that the only other data set used during the map drawing process was the home addresses of members of the General Assembly. As should be evident, this data set contains the home addresses of Members of the General Assembly – as such, we are prepared to produce it to the Plaintiffs as "HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY". Please confirm your agreement to this designation and we will proceed with production of this data set.

Thanks – and have a good weekend.

**Patrick D. Jaugstetter**  
**Jarrard & Davis, LLP**  
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**Cumming, GA 30040**  
**678-455-7150 (Phone)**  
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---

**From:** Love, Cassandra <Cassandra.Love@dechert.com>

**Date:** Saturday, April 1, 2023 at 12:24 AM

**To:** Patrick Jaugstetter <patrickj@jarrard-davis.com>

**Cc:** Bryan Tyson <btyson@taylorenghish.com>, Common Cause Raffensperger

<commoncauseraffensperger@dechert.com>, Jack Genberg <Jack.Genberg@splcenter.org>, Poy Winichakul

<poy.Winichakul@splcenter.org>, Canter, Jacob <JCanter@crowell.com>, Alexander Davis

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boyd@lawyerscommittee.org>, EXT\_Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Matletha

Bennette <matletha.bennette@splcenter.org>, GA-Redistricting <GA\_Redistricting@crowell.com>

**Subject:** RE: Outstanding Discovery Items

Patrick,

I just wanted to follow up after our meet and confer on Tuesday. Please find a brief recap of our conversation and understanding of next steps below.

1. Any communications with and documents generated by Taylor English in their capacity as advisor to the legislature in the summer and fall of 2021.

RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

You confirmed that all responsive Taylor English documents and communications have been produced or logged.

2. Emails and text messages between Representative Jan Jones and Chairman Bonnie Rich or Chairman John Kennedy, specifically in the summer and fall of 2021.

RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

As we indicated to you on Tuesday, despite Rep. Jones's deposition testimony that these communications occurred, we have not been able to locate these documents within the production, nor on the privilege log. You confirmed that you will check to see whether these have been produced, and if they have, you will provide the BATES numbers of these documents. If not, you will confirm that these no longer exist in Rep. Jones, Chairman Rich, or Chairman Kennedy's possession, custody, or control, nor are they retained in any records held by the LCRO.

3. The folder referenced by Senator Mike Dugan in his deposition that was provided to all members of the Senate Committee, including all contents therein.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

As we indicated on Tuesday, we do not have this folder in the production. You confirmed that you have checked with all members who received individual subpoenas, as well as their staff, and with the LCRO itself but none of those individuals (i) retained a hard copy folder, (ii) retained an electronic copy of the folder, (iii) nor remembers what was included inside the folder.

4. All drafts of the Congressional, Senate, and House maps.

RESPONSE: Subject to the exception referenced below with respect to draft maps in member files, all draft maps in the possession, custody or control of the recipients of the subpoenas have been produced.

You confirmed that with Monday's production of an additional 10 map files, found in members' individual folders, we now have all draft maps. As we discussed in the call, the map files that were produced are unreadable. Upon further review, it looks like the map image files were not produced, rather the files seem to only contain metadata. Can you please reproduce these maps with the image files? .shp format would be extremely helpful, if possible.

Further, as we discussed, we appear to have *no* draft maps, outside of the Democratic caucus map, for the Congressional districts. You confirmed that there are none. And, despite Mr.

O'Connor's deposition testimony that there are likely dozens of draft maps, those produced for the senate and house districts are sparse. As we indicated in our call, Plaintiffs remain concerned that other relevant materials—communications, documents, maps, or otherwise—may have been overlooked in collection and production in light of the fact that these 10 map files likely would have never been produced if a witness had not referenced them specifically in deposition testimony almost a year after the subpoenas were issued. In working toward alleviating that concern, we requested information regarding which devices and platforms were collected from, and how that collection was completed—*i.e.* whether members ran their own searches, or whether a forensic collection was completed. We would appreciate this information being provided so that we can assess whether there are outstanding or additional discovery concerns in light of the collection process, or whether we can narrow our outstanding disputes. Please also confirm the search terms used for the second batch of subpoenas (the October 2022 subpoenas) that were utilized in collection and production. We have previously requested this information, but are lacking a response.

5. All information or data from Maptitude that was used to draft the Congressional, Senate, and House maps, including all draft maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

6. All computer files related to drawing the Congressional, Senate, and House maps, and/or related to Maptitude.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

7. All overlays that were created to overlaid any data set onto any proposed, draft, or enacted maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

8. All communications relating to suggestions or directions for changes to any version of the congressional map.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipient of the Subpoenas have either been produced or identified in a privilege log.

With respect to number 8, please confirm that all legislators' personal emails were collected from in addition to their legislator emails, as well as personal cell phones and computers. We noticed, for example, that there are a couple of personal email addresses referenced in certain documents that were produced. We want to ensure a full collection & production in this vein.

With respect to numbers 5-8 and specifically Maptitude, we subpoenaed and still desire any data files that are stored there, including temporary data files, cache data, overlays, autosaved files, etc. For example, we seek any data that relates to maps and data viewed or created by legislators or staff during the Redistricting Process, including files that may relate to versions of maps or layers of data that were constructed or created that could then be viewed in Maptitude. This also includes the statistics created as members or staff changed boundary lines in working sessions to the extent such data is captured in Maptitude. You shared that while your clients likely collected the files responsive to Plaintiffs' subpoenas from Maptitude themselves, they are not experts in

Maptitude even though they utilize that system. You further expressed that this is likely why the ten new draft map files were not previously identified, and you expressed concern about your clients' ability to locate other types of data stored in Maptitude, and capture that data for production. For the reasons expressed on our call, this is concerning—your clients failed to identify and turn over 10 draft map files, and we are unsure what other files may have failed to be identified. We are happy to keep lines of communication open while you complete the process of adequately searching, collecting from, and producing Maptitude files, but we will need to have an understanding, as noted above, regarding how the collection process occurred and what safeguards are being utilized to ensure full compliance with Plaintiffs' subpoenas. While you suggested that it is Plaintiffs' responsibility to specify the information we seek, we have met that obligation through the different demands listed out explicitly in our subpoenas—it is incumbent upon your clients to comply.

As we discussed on Tuesday, some of the information we seek, and are lacking, was referenced in deposition testimony. For your convenience, please note the several relevant excerpts below.

<u>Deposition</u>	<u>Question</u>	<u>Answer</u>	<u>Attorney Comments</u>
O'Connor	Are block equivalency files part of maptitude? Are they installed in maptitude? Do you know that?	I'm not sure on that technical point.	Because you shared that you were unsure what data was input into Maptitude outside of census data—here is an example of other data that may have been utilized, is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
O'Connor	And then once the data's imported into the system, do you feed maptitude specific parameters to generate a map?	I mean, it depend—I mean, I wasn't really involved in the specific map drawing last time. But yeah, you could maybe set different parameters on size and things like that, yeah. I mean, like, you could, you would set a formula for population of a district, things like that.	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data, including the formulas I referenced in our meet and confer, that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	What—what types of statistical reports can be	I mean, there's—there's—you know, there's several dozen reports that—that are	Because you shared that you were unsure how data would be manipulated or created

	created with Maptitude's GIS application?	in Maptitude that you can create reports of. I can't name all of them offhand, but there's—there's a whole tab with like—you know, you can pull up the software, there's a whole tab of reports...there's a community of interest report.	within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	Have you ever manually created any community of interest fields besides the ones that were already in Maptitude?	Yes, I've done schools, for instance.	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	Are there any other [databases you created] besides communities of interest you recall?	The only other one I can recall is economic opportunity zones.	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	So suppose—you're on Maptitude and you want to create a custom demographic report or a custom political report, how would you do that?	Well, the data—so with the data being in there, you would just select those fields and you could print out an Excel database per—of—of per district or whatever geographic feature that you want. Or a district. So that's the Ross form is—is the—you could just literally push a button and export an excel database or there's also some like custom reports, in	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.



		Maptitude that, you know, would, you know, print out if you asked it for those... I mean—I mean, there's fold—there's folders on our—on our network that have, you know, reports from the past, you know, historic reports.	
Strangia	Did you ever—has there ever been a request from a client for a report that includes racial shading?	Over my time here, yes.	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	So suppose you wanted to know, for example, the Black voting age population in District A, what would you do in Maptitude to – to find that out?	You would go to your summary fields and turn on the Black population and it would – it would show it to you... You can make it a label... That would tell you what the population is of -- of whatever data layer that you're using... you can choose [where the data displays]. You can have it go in the upper right corner, lower left corner, middle. You can pick the size of it. You can-- it's -- it's up to the user.	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
Strangia	When you say the building and merging of our election database with census data, what --	So we get election data from the Secretary of State at the precinct level or for precinct layer of geography. So we're consistent here. And it -- what's called --	Because you shared that you were unsure how data would be manipulated or created within Maptitude—here is an example of data that is responsive

	what do you mean by that?	through Maptitude can allocate election and registration data to blocks based on the voting age population of those blocks. So it's an estimate, it's not -- it's --you know, it's not -- you know, it's not true data, it's just -- it's just an estimate.	to Plaintiffs' subpoenas, and that Plaintiffs continue to seek.
O'Connor	Okay. And then what happens with those draft maps? Because now at this point, you must have dozens of them; right?	Yeah, you could.	In light of your confirmation that we now have all draft maps, I would like to reiterate that the number of draft maps received for both House and Senate districts seems remarkably low in light of Mr. O'Connor's testimony, and our team's prior experience. The number of draft maps for Congressional Districts, <i>i.e.</i> zero, seems almost irrational—suggesting that in each meeting with a legislator, Ms. Wright would have had to start over with a clean slate of the map. We continue to raise this issue, as we are not confident that collection and production in this crucial area has been adequately completed.
Strangia	So did you ever receive a Zoom call or a phone call asking for help [with Maptitude]?	Yes. I'm sure that I did. That's pretty-- you know, that's not uncommon for someone in our office to say, "Oh, I can't print something, our printer doesn't work"	This testimony references a backup drive. Please confirm that all backup files, folders, drives, archives that would contain data, information, documents, or communications



		or, you know, "I can't open a plan, it's locked out" or "I lost something, I need something off a <b>backup</b> ." That's not -- that's pretty common, especially when the office is busy.	related to the 2021 Redistricting Process have also been searched, collected from, and produced from. If they have not, please provide information as to what such backup systems exist, and why they have not been searched and collected from.
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We understand, as you indicated, that you will circle back with us after discussing with your team—specifically IT, Alex Khoury, and any legislators or staff you need to confirm with. Nevertheless, in light of the stage of our case and ongoing summary judgement briefing, we would appreciate a response as soon as possible, and certainly no later than the end of next week.

Best,

**Cassandra Love**

Associate

she/her

**Dechert LLP**

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---

**From:** Love, Cassandra <Cassandra.Love@dechert.com>

**Sent:** Thursday, March 23, 2023 12:13 PM

**To:** Patrick Jaugstetter <patrickj@jarrard-davis.com>

**Cc:** Bryan Tyson <btyson@taylorenghish.com>; Common Cause Raffensperger <commoncauseraffensperger@dechert.com>; Jack Genberg <Jack.Genberg@splcenter.org>; Poy Winichakul <poy.Winichakul@splcenter.org>; Canter, Jacob <JCanter@crowell.com>; Alexander Davis <adavis@lawyerscommittee.org>; Julie Houk <jhouk@lawyerscommittee.org>; David Rollins-Boyd <drollins-boyd@lawyerscommittee.org>; EXT\_Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Matletha Bennette <matletha.bennette@splcenter.org>; GA-Redistricting <GA\_Redistricting@crowell.com>

**Subject:** RE: Outstanding Discovery Items

No problem. Let's do 3:30pm ET on Tuesday, March 28.

**Cassandra Love**

Associate

she/her

**Dechert LLP**

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[cassandra.love@dechert.com](mailto:cassandra.love@dechert.com)  
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---

**From:** Patrick Jaugstetter <[patrickj@jarrard-davis.com](mailto:patrickj@jarrard-davis.com)>

**Sent:** Thursday, March 23, 2023 10:09 AM

**To:** Love, Cassandra <[Cassandra.Love@dechert.com](mailto:Cassandra.Love@dechert.com)>

**Cc:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Common Cause Raffensperger <[commoncauseraffensperger@dechert.com](mailto:commoncauseraffensperger@dechert.com)>; Jack Genberg <[Jack.Genberg@splcenter.org](mailto:Jack.Genberg@splcenter.org)>; Poy Winichakul <[poy.Winichakul@splcenter.org](mailto:poy.Winichakul@splcenter.org)>; Canter, Jacob <[JCanter@crowell.com](mailto:JCanter@crowell.com)>; Alexander Davis <[adavis@lawyerscommittee.org](mailto:adavis@lawyerscommittee.org)>; Julie Houk <[jhouk@lawyerscommittee.org](mailto:jhouk@lawyerscommittee.org)>; David Rollins-Boyd <[drollins-boyd@lawyerscommittee.org](mailto:drollins-boyd@lawyerscommittee.org)>; EXT\_Ezra Rosenberg <[erosenberg@lawyerscommittee.org](mailto:erosenberg@lawyerscommittee.org)>; Matletha Bennette <[matletha.bennette@splcenter.org](mailto:matletha.bennette@splcenter.org)>; GA-Redistricting <[GA\\_Redistricting@crowell.com](mailto:GA_Redistricting@crowell.com)>

**Subject:** Re: Outstanding Discovery Items

[EXTERNAL EMAIL]

Cassandra -

I'm sorry - but my schedule was hijacked - I won't be available tomorrow after all - I can be available Tuesday, March 28, after 2:00pm Eastern.

Patrick D. Jaugstetter

Partner

Jarrard & Davis, LLP

222 Webb Street

Cumming, GA 30040

Phone: 678-455-7150

Fax: 678-455-7149

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**From:** Love, Cassandra <[Cassandra.Love@dechert.com](mailto:Cassandra.Love@dechert.com)>

**Sent:** Thursday, March 23, 2023 3:03:59 AM

**To:** Patrick Jaugstetter <[patrickj@jarrard-davis.com](mailto:patrickj@jarrard-davis.com)>

**Cc:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Common Cause Raffensperger <[commoncauseraffensperger@dechert.com](mailto:commoncauseraffensperger@dechert.com)>; Jack Genberg <[Jack.Genberg@splcenter.org](mailto:Jack.Genberg@splcenter.org)>; Poy Winichakul <[poy.Winichakul@splcenter.org](mailto:poy.Winichakul@splcenter.org)>; Canter, Jacob <[JCanter@crowell.com](mailto:JCanter@crowell.com)>; Alexander Davis <[adavis@lawyerscommittee.org](mailto:adavis@lawyerscommittee.org)>; Julie Houk <[jhouk@lawyerscommittee.org](mailto:jhouk@lawyerscommittee.org)>; David Rollins-Boyd <[11](mailto:drollins-</a></p></div><div data-bbox=)

boyd@lawyerscommittee.org>; EXT\_Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Matletha Bennette <matletha.bennette@splcenter.org>; GA-Redistricting <GA\_Redistricting@crowell.com>

**Subject:** RE: Outstanding Discovery Items

Patrick,

Thank you for providing the below information. I am available for a meet and confer to discuss the below requests and responses between 11am and 1pm PT (2pm-4pm ET) on Friday, March 24. Please let me know what time works for you and I will circulate an invite.

Best,

**Cassandra Love**

Associate

she/her

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Los Angeles, CA 90071

+1 212 808 5722 Direct

[cassandra.love@dechert.com](mailto:cassandra.love@dechert.com)

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---

**From:** Patrick Jaugstetter <patrickj@jarrard-davis.com>

**Sent:** Wednesday, March 22, 2023 3:00 PM

**To:** Love, Cassandra <Cassandra.Love@dechert.com>

**Cc:** Bryan Tyson <btyson@taylorenghish.com>; Common Cause Raffensperger <commoncauseraffensperger@dechert.com>; Jack Genberg <Jack.Genberg@splcenter.org>; Poy Winichakul <poy.Winichakul@splcenter.org>; Canter, Jacob <JCanter@crowell.com>; Alexander Davis <adavis@lawyerscommittee.org>; Julie Houk <jhouk@lawyerscommittee.org>; David Rollins-Boyd <drollins-boyd@lawyerscommittee.org>; EXT\_Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Matletha Bennette <matletha.bennette@splcenter.org>; GA-Redistricting <GA\_Redistricting@crowell.com>

**Subject:** Outstanding Discovery Items

[EXTERNAL EMAIL]

Cassandra:

In response to your inquiry regarding outstanding matters related to the Non-Party Subpoenas served on the Members, Committees and Staff of the General Assembly, please see below:

1. Any communications with and documents generated by Taylor English in their capacity as advisor to the legislature in the summer and fall of 2021.  
RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.
2. Emails and text messages between Representative Jan Jones and Chairman Bonnie Rich or Chairman John Kennedy, specifically in the summer and fall of 2021.  
RESPONSE: All communications responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

3. The folder referenced by Senator Mike Dugan in his deposition that was provided to all members of the Senate Committee, including all contents therein.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipients of the Subpoenas have either been produced or identified in a privilege log.

4. All drafts of the Congressional, Senate, and House maps.

RESPONSE: Subject to the exception referenced below with respect to draft maps in member files, all draft maps in the possession, custody or control of the recipients of the subpoenas have been produced.

5. All information or data from Maptitude that was used to draft the Congressional, Senate, and House maps, including all draft maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

6. All computer files related to drawing the Congressional, Senate, and House maps, and/or related to Maptitude.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

7. All overlays that were created to overlie any data set onto any proposed, draft, or enacted maps.

RESPONSE: We would like to discuss this with you further to gain a better understanding of this request. As I indicated yesterday, I can be available for a meet and confer on Friday, March 24, 2023 to discuss.

8. All communications relating to suggestions or directions for changes to any version of the congressional map.

RESPONSE: All documents and records responsive to the Subpoenas and found in the possession, custody or control of the recipient of the Subpoenas have either been produced or identified in a privilege log.

Finally, as to draft Congressional, Senate, and House maps saved in Members' folders as referenced by Dan O'Connor in his deposition; we have identified eight (8) draft maps that were saved in Members' file folders at the LCRO and which were overlooked in the initial productions. These draft maps will be produced on or before Monday, April 27, 2023.

Please let me know when you are available for a meet and confer.

Patrick D. Jaugstetter

Partner

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# EXHIBIT 18



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## Voting & Elections Campaigns...

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## **ELECTION PROTECTION IN GEORGIA**



## **THE PEANUT GALLERY**





## End Gerrymandering in Georgia

Join Common Cause Georgia as we lobby local and state elected officials on the importance of protecting 'one person, one vote'.

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GERRYMANDERING GEORGIA  
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# EXHIBIT 19

Georgia State Conference of The NAACP, et al. v. S

Page 1

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

4 GEORGIA STATE CONFERENCE OF  
THE NAACP, et al.,  
Plaintiffs,

5 vs. CIVIL ACTION FILE NO.

6 1:21-CV-5338-ELB-SCJ-SDG  
STATE OF GEORGIA, et al.,  
Defendants.

7  
8 -----  
COMMON CAUSE, et al.,  
Plaintiffs,

9 vs. CIVIL ACTION FILE NO.

10 1:22-CV-00090-ELB-SCJ-SDG  
BRAD RAFFENSPERGER,  
11 Defendants.

12  
13 30(b)(6) DEPOSITION OF COMMON CAUSE  
14 (TREAUNNA DENNIS)

15 January 13, 2023

16 11:04 a.m.

17 Taylor English Duma LLP

18 1600 Parkwood Circle, Suite 200

19 Atlanta, Georgia

20 Robyn Bosworth, RPR, CRR, CRC, CCR-B-2138

21

22

23

24

25

1 A I've looked at it.

2 Q Thank you.

3 So the factual allegations contained in  
4 paragraphs 12 through 16, is -- strike that.

5 Is everything that's stated in paragraphs  
6 12 through 16 true and correct?

7 A Yes.

8 Q And we were just speaking about the  
9 diversion of nonfinancial resources, and looking at  
10 paragraph number 14, it refers to that Common Cause  
11 has been forced to divert resources toward directly  
12 combating the ill effects of unlawful redistricting.

13 Do you see that?

14 A Yes.

15 Q And you agree that that's accurate?

16 A Yes.

17 Q How has Common Cause Georgia's programming  
18 changed as a result of the adoption of the  
19 redistricting maps here in Georgia in 2021?

20 MR. JAMIESON: Objection, vague.

21 BY MS. LAROSS:

22 Q You can go ahead and answer to the best of  
23 your understanding.

24 A The Georgia office, since the enactment of  
25 the redistricting maps we've had to increase our

1 capacity in our office to do more education  
2 regarding the changes to mapping.

3 Q And describe more specifically what  
4 that -- what you mean by the increase in capacity.

5 MR. JAMIESON: Objection, vague. You may  
6 answer.

7 A We had to hire more staff members.

8 BY MS. LAROSS:

9 Q How many additional staff members have you  
10 had to hire as a result of the adoption of the maps  
11 here in Georgia?

12 A We hired one more staff member and moved a  
13 contractor to a permanent role.

14 Q To your knowledge, is that something --  
15 let me start that again.

16 To your knowledge, is the increase in  
17 capacity after redistricting maps had been adopted  
18 here in Georgia, is that something that typically  
19 happens in redistricting cycles that the Common  
20 Cause Georgia has been involved in, or is that  
21 something unusual?

22 MR. JAMIESON: Objection, vague, compound.

23 BY MS. LAROSS:

24 Q Do you want me to rephrase that? I can  
25 start again if it's unclear to you.

1 A No, you don't have to rephrase it. So  
2 it's not necessarily typical; however, our staff  
3 members, they work on different projects as well, so  
4 we needed more -- more manpower and more bodies to  
5 do our programmatic work because this is also  
6 happening during the time of a municipal election.

7 Q So what you described, you're saying your  
8 staff members have to do other work?

9 A Yes.

10 Q Do you mean other work that is not related  
11 to redistricting?

12 A Not related to redistricting but may  
13 interact with redistricting.

14 Q You said you added one more staff member.  
15 Was that a full-time position?

16 A Yes.

17 Q When was that person hired?

18 A That person was hired in March 2022.

19 Q I think you mentioned that there was other  
20 additional resources added to increase capacity  
21 since the maps were adopted. Other than the one  
22 staff member that you've described, what else was  
23 done?

24 A We increased our efforts to do more direct  
25 communications with community members and members of

1 Common Cause Georgia, and also we created more  
2 channels to be able to build resources for our  
3 coalition partners.

4 Q Those efforts, were those undertaken by  
5 Common Cause Georgia staff, or were those undertaken  
6 by volunteers, or -- let me ask it this way: Who  
7 undertook the creation of more channels in the work  
8 that you just described?

9 A Common Cause Georgia staff, and also with  
10 the help of some of our national staff members.

11 Q How much of the national staff members  
12 involved in Common Cause Georgia's -- work on  
13 redistricting here in Georgia?

14 A During this time frame maybe 5 percent of  
15 their staff time would be allocated to bucket  
16 filling and filling the gaps for the Common Cause  
17 Georgia office due to the lack of capacity within  
18 the state.

19 Q That work that you just described, would  
20 that -- is that the -- the 5 percent, is that result  
21 of the adoption of the redistricting maps here in  
22 Georgia?

23 MR. JAMIESON: Objection, vague.

24 A It's a result of the potential adoption of  
25 the maps and the -- and a result of the education



1 that was needed due to the back-and-forth that was  
2 happening in legislature regarding the maps.

3 BY MS. LAROSS:

4 Q When you say "the back-and-forth" in the  
5 legislature, are you talking about the Georgia  
6 legislature special session concerning redistricting  
7 in 2021?

8 A Yes, the special session, and also the  
9 redistricting hearings tours that happened across  
10 the state as well.

11 Q And those hearings, were those during  
12 2021?

13 A Yes.

14 Q And aside from the additional staff member  
15 and the increasing capacity that you described, was  
16 there any other changes in the allocation of  
17 nonfinancial resources by Common Cause Georgia as a  
18 result of the adoption of the redistricting maps in  
19 Georgia?

20 MR. JAMIESON: Objection, vague.

21 A Can you restate that for me?

22 BY MS. LAROSS:

23 Q Sure. Sure. Common Cause Georgia is  
24 asserting a claim for diversion of nonfinancial  
25 resource; is that correct?

1 A Yes.

2 Q You described some things that are part of  
3 that claim for diversion of nonfinancial resources.  
4 Am I correct about that?

5 A Yes.

6 Q Is there anything else that you would --  
7 when I say "you," I mean Common Cause Georgia --  
8 would consider as part of the claim of diversion of  
9 nonfinancial resources as a result of the adoption  
10 of the redistricting maps?

11 MR. JAMIESON: Objection, vague.

12 Objection, calls for legal conclusion.

13 BY MS. LAROSS:

14 Q Yeah, and I'm not, certainly, asking you  
15 for a legal conclusion. It's just what your  
16 understanding is on behalf of the organization.

17 A Yes, so during this time we also had to  
18 divert attention from some of the other programmatic  
19 work that we do at Common Cause Georgia.

20 Q Tell me specifically about that.

21 A Sure. So during this time we were  
22 mobilizing around a municipal election, so typically  
23 we would have more conversations with election  
24 boards, election offices; we would build out more  
25 resources to educate voters regarding the changes

1 was that changed as a result of the work needing to  
2 be done under redistricting?

3 A So during this time frame our -- Governor  
4 Kemp had issued direct funding to electronic boards  
5 in middle Georgia and south Georgia for increased  
6 broadband accessibility. During this time we wanted  
7 to work with community members in those select areas  
8 of middle and south Georgia to do further education  
9 around the funding that was coming to the EMIs to be  
10 given to communities to have more broadband  
11 accessibility; however, we were not able to do so  
12 because we had to divert attention to redistricting  
13 efforts.

14 Q And when you say during this time frame,  
15 what is the time frame with respect to the  
16 transparency of funding work that you described  
17 there?

18 A Spring 2021 through the fall of 2021.

19 Q Any other examples or any other work that  
20 Common Cause Georgia is claiming had to be diverted  
21 to redistricting efforts?

22 A Yes, during this time also there was a  
23 small campaign regarding eminent domain procedures  
24 in the city of Atlanta. Common Cause previously  
25 worked on these transparency procedures in 2012, and

1 it was a mobilization within the community of  
2 Peoplestown, which is in southeast Atlanta. We were  
3 unable to fully engage in that campaign during that  
4 time -- well, during the 2021 time frame.

5 Q Did Common Cause Georgia have to cease any  
6 programming, stop any programming as a result of  
7 efforts related to the adoption of the new  
8 redistricting maps in Georgia?

9 MR. JAMIESON: Objection, vague.

10 BY MS. LAROSS:

11 Q You can respond as best you understand.

12 A We did not have to cease any of our  
13 programming. We just had limited capacity to do any  
14 work on the programming, so limited engagement.

15 Q Okay. So the programs that you've  
16 described -- when you say "limited engagement," do I  
17 understand correctly that what you mean is just  
18 those programs continued but at a less amount of  
19 engagement by Common Cause?

20 A Yes.

21 Q Can you say generally a percentage of the  
22 work that had to be stopped in order to respond to  
23 the adoption of the redistricting maps?

24 A Yes. So, for example, with eminent domain  
25 work, we were not able to do community engagement

1 during that time. All we were able to do was do,  
2 like, a member update via e-mail to our members  
3 that -- to put it on their radar it was happening,  
4 but we could not do, like, direct one-on-one  
5 engagement within the community. Same as with  
6 broadband accessibility and sheriff accountability  
7 with elections.

8 THE REPORTER: Did you say "sheriff"?

9 THE WITNESS: Yes, or local law  
10 enforcement accountability with elections.

11 MS. LAROSS: Would you mind if we took  
12 just a short break, a five-minute break?

13 MR. JAMIESON: Not at all.

14 (Off-the-record discussion.)

15 MS. LAROSS: So we're going to take a  
16 lunch break now, and we'll take an hour break, so  
17 we'll be back at 1:35. Is that agreeable?

18 MR. JAMIESON: That's agreeable.

19 (Recess 12:35-1:54 p.m.)

20 MS. LAROSS: We're going back on the  
21 record to continue the 30(b)(6) deposition of Common  
22 Cause.

23 BY MS. LAROSS:

24 Q Ms. Dennis, I just remind you -- you're  
25 aware you're still under oath, correct?

1 A Yes.

2 Q Before we took the lunch break, we were  
3 talking about diversion of nonfinancial resources,  
4 and I wanted to discuss about -- is there any other  
5 changes that -- in the work done by Common Cause  
6 Georgia that you would attribute to the  
7 redistricting maps and the adoption of the maps?

8 A During this time we had the -- I don't  
9 know if this is beforehand, but we had the desire to  
10 hire, and we were not able to do those portions of  
11 our work with that.

12 Q And what was the time frame of that when  
13 you decided to hire and were not able to do so?

14 A We wanted to start hiring in  
15 August-September of 2021, and we were not able to do  
16 interviews, and November 2021 -- November-December  
17 2021 we were not able to complete interviews.

18 Q Any other changes or diversion of  
19 nonfinancial resourced during 2022?

20 A So during 2022 we were going -- sorry, can  
21 you clarify which year you're speaking of of the  
22 diversion?

23 Q Sure. Let me start over then.

24 So I'm referring to January 1 of 2022 --

25 A Okay.

1 Q -- through December 31st of 2022.

2 A Okay. So the top of the year of 2022 we  
3 began our legislative cycle, so we wanted to have  
4 our research analyst and policy person hired. Also,  
5 we wanted to have our -- an organizer hired to our  
6 office to work on our legislative efforts and also  
7 working on our local redistricting work and our  
8 elections engagement work, and we were not able to  
9 do that during that time.

10 Also during that time we were in  
11 legislative session, so it was much needed to have  
12 interns onboard. Also doing more member engagement  
13 to our direct members around the legislative  
14 session, we had to dial back using our capacity on  
15 that so we could focus in on what had just happened  
16 with the maps and better understanding what was  
17 happening with local redistricting bills during that  
18 time.

19 Q And what you described when you're saying  
20 what had happened with the maps, are you talking  
21 about when the maps were adopted by the legislature  
22 and then signed into law by the Governor?

23 A Yes.

24 Q So what you -- and you wanted to have --  
25 do I understand it correctly that you wanted to have

1 a staff person in place in the beginning of the 2022  
2 legislative session?

3 A Yes.

4 Q And you were not able to do that?

5 A Yes.

6 Q Were you -- and you said that you had to  
7 dial back the legislative work.

8 A Yes.

9 Q So how would you quantify how much work  
10 had to be dialed back?

11 A So during this time we usually do more  
12 member-facing engagements with webinars, boot camps,  
13 and we were unable to do that during that time, or  
14 we had to limit the amount that we would do.

15 Typically in the month of January each  
16 week we're doing some type of member engagement with  
17 our members that is direct member engagement. When  
18 I say "direct member engagement," I'm speaking of  
19 doing a legislative preview, doing a boot camp on  
20 what is the inner workings of the legislative  
21 session, what's the rollover of legislative bills,  
22 and we would do that in, like, many sessions each  
23 week of the first month of the legislative session;  
24 we were only able to complete our legislative  
25 preview.



1 Q How about Dr. Ursula Thomas, is she a  
2 member of Common Cause?

3 MR. JAMIESON: Same objection and instruct  
4 the witness not to answer.

5 BY MS. LAROSS:

6 Q Dr. Benjamin Williams, is he a member of  
7 Common Cause?

8 MR. JAMIESON: Same objection, same  
9 instruction.

10 BY MS. LAROSS:

11 Q And Brianne Perkins, is she a member of  
12 Common Cause?

13 MR. JAMIESON: Same objection, same  
14 instruction.

15 MS. LAROSS: We disagree with the  
16 assertion of the privilege with respect to the  
17 individuals.

18 BY MS. LAROSS:

19 Q Has Common Cause identified individuals  
20 that it is asserting a claim in this lawsuit on  
21 behalf of?

22 A Can you restate that for me?

23 Q Sure. Sure. We were talking with respect  
24 to paragraph number 16. We can go back to that  
25 where it says that Common Cause brings this action

1 on behalf of its members and supporters. Has Common  
2 Cause Georgia identified members and supporters that  
3 it is bringing this action on behalf of as  
4 referenced in paragraph 16?

5 A We have identified members who live within  
6 the boundaries of the challenged districts.

7 Q And has Common Cause identified those  
8 individuals?

9 A We have identified them due to matching of  
10 engagement and call to actions or asks to do  
11 mobilization regarding the redistricting efforts in  
12 Georgia, and also if they have donated to the --  
13 will donate to the efforts in Georgia, and also we  
14 match them via looking at their ZIP codes and if  
15 those ZIP codes are within the challenged districts.

16 Q And how many individuals have been  
17 identified as residing within the challenged  
18 districts?

19 A We have -- we identified, I believe,  
20 over -- over 1500 members.

21 Q Am I correct to understand that the  
22 challenged -- the districts that Common Cause  
23 Georgia is challenging are Congressional Districts  
24 6, 13, and 14 in this lawsuit?

25 A Yes.

1 Q And that number of individuals are folks  
2 that currently reside in Districts 6, 13, and 14?

3 A Yes.

4 Q Is Common Cause Georgia willing to provide  
5 us a list of those individuals?

6 MR. JAMIESON: Objection.

7 MS. LAROSS: Subject to the objection, are  
8 you --

9 MR. JAMIESON: She can answer yes, no,  
10 otherwise instruct not to answer subject to  
11 associational privilege.

12 MS. LAROSS: So are you instructing her --  
13 do I understand that that list would not be produced  
14 to us because of the associational privilege?

15 MR. JAMIESON: Correct.

16 MS. LAROSS: Counsel, would you be willing  
17 to produce that list pursuant to a protective order?

18 MR. JAMIESON: If we're going to discuss  
19 that, I think we should go off record and we can  
20 confer, but otherwise -- well, I'd say let's go off  
21 record if we want to discuss that.

22 MS. LAROSS: Sure, we'll discuss that with  
23 you off the record.

24 BY MS. LAROSS:

25 Q What percentage of Common Cause Georgia's

1 have to either remove ourselves or disengage because  
2 of those different lines of -- that we can, like,  
3 teeter that other organizations would not be able to  
4 do. That's how I understand the question.

5 Q So if we can go back to Exhibit Number 2  
6 and paragraph number 13. Once you have a chance to  
7 look at paragraph 13, let me know.

8 A I've looked at it.

9 Q And it says in the second sentence: In  
10 Georgia, Common Cause works to strengthen public  
11 participation in our democracy and ensure that  
12 public officials and public institutions are  
13 accountable and responsive to citizens.

14 Is that an articulation of the purpose of  
15 Common Cause Georgia?

16 A Yes, it's a part of our purpose, yes.

17 Q And what else is -- would be included in  
18 your purpose or the purpose of Common Cause Georgia?

19 A We also value ourself in working with --  
20 working with the public and community members and  
21 electeds to mitigate solutions within a community  
22 regarding ethics and transparency as well. When I  
23 say "ethics," I'm speaking of, like, transparency,  
24 the distribution of funding as it states to  
25 taxpayers' dollars, to better distill that.

1 than your attorneys, in preparation for testimony on  
2 topic number 8?

3 A Suzanne Almeida and Jack Mumby from our  
4 national office.

5 Q And what information did they provide to  
6 you?

7 A They provided the information of how do we  
8 maintain our membership lists.

9 Q Any other information that they provided  
10 to you?

11 A No.

12 Q Describe the nature of membership of  
13 Common Cause -- let's talk about Common Cause  
14 Georgia first.

15 A Common Cause Georgia, we have a little  
16 over 26,000 members across the state. A lot of our  
17 engagement with our members is mostly digital and  
18 virtual, and we do outreach to our members via  
19 digital engagement, also action-oriented  
20 programming, and volunteer engagement.

21 Q What you just described, would that have  
22 been accurate in 2021?

23 A Yes.

24 Q And as well in 2022?

25 A Yes.

1 engagement, what do you mean by that?

2 A So if they have responded to -- if they  
3 responded to the need of calling their  
4 legislature -- their legislator, if they are not  
5 understanding what's happened with the maps or  
6 benchmarks that have been decided upon, so it's  
7 mostly that they have engaged in an action with our  
8 office, and they reside within those challenged  
9 district boundaries.

10 Q And the action with your office, is that  
11 just by digital communication or is it in person?  
12 Tell me what those actions are.

13 A So those actions could be the digital  
14 communication; it could have been an in-person  
15 community Town Hall session; it could be them  
16 speaking directly with legislators regarding maps in  
17 their district.

18 Q Does Common Cause use any list from any  
19 other organizations?

20 A No.

21 Q You mentioned that the -- strike that.

22 How does Common Cause know where a member  
23 lives and if they live in a challenged district  
24 if -- how does Common Cause determine what district  
25 folks live in?

1           A       When folks elect to become members of  
2       Common Cause Georgia, they actually give us their  
3       address for communications purposes, so we have a  
4       list of their address, which includes their -- their  
5       city, their ZIP code.   We can distill -- from there  
6       we can distill what's their county and if that ZIP  
7       code or county is within a impacted district.

8           Q       And also I think you mentioned that folks  
9       can -- if they're in person at an event where Common  
10      Cause is attending they can submit a card?

11          A       Yes.

12          Q       And on the card -- what information is on  
13      the card?

14          A       On the card it asks you if you want to  
15      be -- if you want to be a member, volunteer with  
16      Common Cause Georgia, and it asks for your residency  
17      information.

18          Q       Okay.   So let's go ahead and go on to the  
19      next topic, and I believe -- let's see.

20                 MS. LAROSS:   We're on topic number 10,  
21      which counsel has indicated that y'all are not  
22      providing anybody in response to -- a designee in  
23      response to topic number 10 based upon the  
24      attorney-client privilege; is that correct?

25                 MR. JAMIESON:   Correct.

CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 30th day of January, 2023.



ROBYN BOSWORTH, RPR, CRR, CRC, CCR-B-2138



# EXHIBIT 20

## (Filed Under Seal)

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

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )

*Plaintiffs,*

v. )  
STATE OF GEORGIA, et al. )

*Defendants.*

---

COMMON CAUSE, et al., )

*Plaintiffs,*

v. )  
BRAD RAFFENSPERGER )

*Defendant.*

---

Case No. 1:21-CV-5338- ELB-SCJ-SDG

Case No. 1:22-CV-00090- ELB-SCJ-SDG

**DECLARATION OF TREAUNNA (AUNNA) DENNIS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Treanna (Aunna) Dennis, declare:

1. I am currently employed as the Executive Director of Common Cause Georgia ("Common Cause"), a position I have held for the last three years. I reside in [REDACTED].

2. Common Cause has over 26,000 members in Georgia.

3. Common Cause has at least 767 members in Congressional District (“CD”) 6.

4. Common Cause has at least 143 members in CD 13.

5. Common Cause has at least 848 members in CD 14.

6. Common Cause was able to determine the residency of its members because all members, when they elect to become members of Common Cause, provide their address for communications purposes, which includes their ZIP codes.

7. Similarly, individuals attending an in-person Common Cause event can submit a card to become a member, which also asks for the member’s address information.

8. Based on the members’ ZIP codes, Common Cause is able to distill their county, and whether that ZIP code or county lies wholly within CD 6, CD 13, or CD 14 (collectively “Challenged Districts”). Only those ZIP codes wholly included in a district were used to calculate the number of members per district included herein.

9. Common Cause historically keeps its membership list and member information confidential.

10. Based on my experience in redistricting and my involvement with Common Cause, I believe that the specific identification of our members would place their safety and privacy in jeopardy.

11. In the current political climate, private individuals are finding themselves increasingly vulnerable to public attacks, conflicts, and doxing.

12. For example, the doxing of poll workers during the 2020 election intimidated individuals—especially young individuals—and dissuaded the community from continues or new participation.

13. As a result, community members have experienced a chilling effect on their desire and capacity to be publicly affiliated with even nonpartisan organizations that engage in civic issues. Individual members have expressed a fear of the impact that public identification would have on their livelihood.

14. Common Cause is therefore extremely careful with its members' identifying information and typically does not disclose such information absent consent or a legal order to do so.

15. In an abundance of caution, and in order to ensure Common Cause is able to vindicate its members' most essential and fundamental right to be represented in government, Common Cause identifies one member from each of the Challenged Districts below.

16. Common Cause identified these members using the same process as described above. Common Cause spoke to each of these members to obtain their consent to providing this information to the Court and to Defendant's counsel with the understanding that it would be filed under seal.

17. [REDACTED] is a resident of CD 6 of voting age. [REDACTED] resides at [REDACTED] is an active member of Common Cause.

18. Common Cause has identified numerous members that reside in CD 13, as specified above. Common Cause is continuing to work with its CD 13 members in order to obtain consent to divulge a member's name and address to the Court under seal and will notify counsel when consent is obtained.

19. [REDACTED] is a resident of CD 14 of voting age. [REDACTED] resides at [REDACTED] is an active member of Common Cause.

20. The State of Georgia's redistricting plan has forced Common Cause to divert personnel, time, and resources to combat the plan's ill effects.

21. Common Cause has diverted personnel, time, and resources to provide education regarding the changes to the map.

22. Further, Common Cause was forced to increase its efforts on direct communications with community members and members of Common Cause and Common Cause created more channels to be able to build resources for its coalition partners.

23. The enactment of SB2EX directly resulted in Common Cause being unable to perform several planned projects and activities that it would have otherwise.

24. Common Cause typically would have more conversations with election boards, and election officers, would build out more resources to provide voter education, work more closely on voting security, and hired additional staff.

25. Common Cause could not engage in these and other activities because it had to divert attention and resources to its redistricting efforts in light of the enacted congressional map.

26. Common Cause was also unable to fully engage in direct member engagement concerning legislative previews and boot camps on the upcoming legislative session as a result of SB2EX. Rather, Common Cause was able only to complete the legislative preview and not the full anticipated engagement.

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

Executed in Atlanta, Georgia, on this 26th day of April 2023.

By: /s/ Treaunna Dennis

Treaunna Dennis

# EXHIBIT 21

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## About

### League of Women Voters of Georgia

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&lt;

## Our Mission and Roles

The League of Women Voters is a nonpartisan political organization encouraging informed and active participation in government. It influences public policy through education and advocacy. We never support or oppose any political party or candidate.

### The League of Women Voters has two separate and distinct roles:

- Voters Service/Citizen Education: we present unbiased nonpartisan information about elections, the voting process, and issues.
- Action/Advocacy: we are also nonpartisan, but, after study, we use our positions to advocate for or against particular policies in the public interest.

To conduct our voter service and citizen education activities, we use funds from the League of Women Voters Education Fund, which is a 501(c)(3) corporation, a nonprofit educational organization.

**The League of Women Voters, a membership organization, conducts action and advocacy and is a nonprofit 501(c)(4) corporation.**

Our [Vision, Beliefs, and Intentions](#) guide our activities.

## Other League Organizations

### We currently have local Leagues in the following areas:

- [Atlanta-Fulton County](#)
- [Carrollton-Carroll County](#) (FB)
- [Chattahoochee Valley](#) (FB)
- [Central Savannah River Area](#) (FB)
- [Coastal Georgia](#)
- [Dalton](#) (FB)
- [DeKalb](#) (FB)
- [Gwinnett](#) (FB)
- [Macon - Bibb County](#)
- [Marietta-Cobb County](#)
- [Rabun County](#) (FB)
- [Rome/Floyd County](#) (FB)

## National League

- [League of Women Voters of the United States](#)
- [Facebook Page of League of Women Voters of the United States](#)





## More About the League

### What Does the League Do Now?

The League of Women Voters is a peoples' organization that has fought since 1920 to improve our government and engage all Americans in the decisions that impact their lives. We operate at national, state and local levels through more than 800 state and local Leagues, in all 50 states as well in DC, the Virgin Islands and Hong Kong. We never endorse or oppose political parties or candidates, but we are political.

Formed from the movement that secured the right to vote for women, the centerpiece of the League's efforts remain to expand participation and give a voice to all Americans. We do this at all three levels of government, engaging in both broad educational efforts as well as advocacy. Our issues are grounded in our respected history of making democracy work for all Americans.

### Why Should I Support the League of Women Voters?

The League is different from many organizations in that what it accomplishes comes directly from the involvement of its members. It is a **grassroots organization** providing every member with opportunities to learn and educate others about government, and take action on public policy. We walk our talk: we believe that we need everyone to participate in order for our community to be strong, safe and vibrant. Whether you contribute your time, your money, or both you can feel confident that your investment in democracy goes further in the League.

Groups of League members meet to discuss topics in a respectful setting. They learn effective techniques for public discussion, how to advocate on specific policies, and what the issues beneath the rhetoric are. Our study and consensus process ensures that we are fully informed on issues before we take a stand. We also host public forums and debates which are well known for being fair, transparent and civil. This approach has earned the League a global reputation for integrity and thoroughness.

Your participation in League will expose you to a breadth of experiences and issues that will not only inform you but create greater possibilities for civic engagement than you might imagine. You can spend as much or as little time as you wish. Whether you aspire to leadership or are keen to follow the lead of experienced members, the League will excite, use, and nurture your civic curiosity, ideals, or desire for action. We offer our members webinars, conference calls, workshops, other events and mentorship opportunities throughout the year, at the local, regional, state and national levels.

- Attend an event on our [calendar](#)
- [Contact us](#) to get involved

Voter Education

We make voting easier through varied voter education programs.

The League of Women Voters Education Fund conducts voter service and citizen education activities. It is a nonpartisan, nonprofit public policy educational organization, which:

- Builds citizen participation in the democratic process.
- Studies key community issues at all government levels in an unbiased manner.
- Enables people to seek positive solutions to public policy issues through education and conflict management.

Donations to the Education Fund, a 501(c)(3) corporation, are fully tax-deductible where allowed by law.

[Donate to the Education Fund](#)

## Our Principles

The goal of the League of Women Voters is to empower citizens to shape better communities worldwide.

### The Principles that Guide our Organization...

**The League of Women Voters** believes in representative government and in the individual liberties established in the Constitution of the United States.

**The League of Women Voters** believes that democratic government depends upon the informed and active participation of its citizens and requires that governmental bodies protect the citizen's right to know by giving adequate notice of proposed actions, holding open meetings and making public records accessible.

**The League of Women Voters** believes that every citizen should be protected in the right to vote; that every person should have access to free public education that provides equal opportunity for all; and that no person or group should suffer legal, economic or administrative discrimination.

**The League of Women Voters** believes that efficient and economical government requires competent personnel, the clear assignment of responsibility, adequate financing, and coordination among the different agencies and levels of government.

**The League of Women Voters** believes that responsible government should be responsive to the will of the people; that government should maintain an equitable and flexible system of taxation, promote the conservation and development of natural resources in the public interest, share in the solution of economic and social problems that affect the general welfare, promote a sound economy and adopt domestic policies that facilitate the solution of international problems.

**The League of Women Voters** believes that cooperation with other nations is essential in the search for solutions to world problems and that development of international organization and international law is imperative in the promotion of world peace.

### Our Vision, Beliefs, and Intentions

**The League of Women Voters is a nonpartisan political membership organization which:**

- acts after study and member agreement to achieve solutions in the public interest on key community issues at all government levels
- builds citizen participation in the democratic process.
- engages communities in promoting positive solutions to public policy issues through education and advocacy.

**The League of Women Voters Education Fund is a nonpartisan public policy educational organization which:**

- builds citizen participation in the democratic process
- studies key community issues at all governmental levels in an unbiased manner
- enables people to seek positive solutions to public policy issues through education and conflict management.

**We believe in:**

- respect for individuals
- the value of diversity
- the empowerment of the grassroots, both within the League and in communities

**We will:**

- act with trust, integrity and professionalism
- operate in an open and effective manner to meet the needs of those we serve, both members and the public
- take the initiative in seeking diversity in membership
- acknowledge our heritage as we seek our path to the future.

## History of the League

### What is the History of the League of Women Voters?

In her address to the National American Woman Suffrage Association's (NAWSA) 50th convention in St. Louis, Missouri, President Carrie Chapman Catt proposed the creation of a **"league of women voters to finish the fight and aid in the reconstruction of the nation."**

Women Voters was formed within the NAWSA, composed of the organizations in the states where suffrage had already been attained. The next year, on February 14, 1920 - six months before the 19th amendment to the Constitution was ratified - the League was formally organized in Chicago as the national League of Women Voters. Catt described the purpose of the new organization:

**The League of Women Voters is not to dissolve any present organization but to unite all existing organizations of women who believe in its principles.** It is not to lure women from partisanship but to combine them in an effort for legislation which will protect coming movements, which we cannot even foretell, from suffering the untoward conditions which have hindered for so long the coming of equal suffrage. Are the women of the United States big enough to see their opportunity?

Maud Wood Park became the first national president of the League and thus the first League leader to rise to the challenge. She had steered the women's suffrage amendment through Congress in the last two years before ratification and liked nothing better than legislative work. From the very beginning, however, it was apparent that the legislative goals of the League were not exclusively focused on women's issues and that citizen education aimed at all of the electorate was in order.

**Since its inception, the League has helped millions of women and men become informed participants in government.**

In fact, the first league convention voted 69 separate items as statements of principle and recommendations for legislation. Among them were protection for women and children, right of working women, food supply and demand, social hygiene, the legal status of women, and American citizenship.

The League's first major national legislative success was the passage of the Sheppard-Towner Act providing federal aid for maternal and child care programs. In the 1930's, League members worked successfully for enactment of the Social Security and Food and Drug Acts.

Due at least in part to League efforts, legislation passed in 1938 and 1940 removed hundreds of federal jobs from the spoils system and placed them under Civil Service.

During the postwar period, the League helped lead the effort to establish the United Nations and to ensure U.S. Participation. The League was one of the first organizations in the country officially recognized by the United Nations as a non-governmental organization; it still maintains official observer status today.

See the [History section of the League of Women Voters](#) of the US website.

## Directors

Susannah Scott, *President*

Rebecca Moya, *1st Vice President, Organization*

Annelle Colevins, *Secretary*

Tracy Adkison, *Director, Training (Past President)*

Julie Bolen, *Director, Redistricting*

Rashidah Hasan, *Director, Communications*

Juliana Henoa, *Director, Events*

Nicola Hines, *Director, Forums*

Demetris Johnson, *Director, Voter Services*

Monique McNeil, *Director, Bylaws*

Susan Ogletree, *Director, Grant Management*

Miriam Pollock, [Director, Fundraising](#)

Amy Stuckey, [Director, Membership](#)

Elizabeth Poythress, [Board Advisor \(Past President\)](#)



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## Contact Us

Phone 404-522-4598  
LWV of Georgia  
PO Box 177  
Decatur, Georgia 30031

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# EXHIBIT 22

Georgia State Conference of The NAACP, et al. v. S

Page 1

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

GEORGIA STATE CONFERENCE OF THE )  
NAACP, ET AL., ) CASE NO. 1:21-CV-5338-  
ELB-SCJ-SDG

PLAINTIFFS, )

v. )

STATE OF GEORGIA, ET AL., )

DEFENDANTS. )

----- )  
COMMON CAUSE, ET AL., ) CASE NO. 1:22-CV-00090-  
ELB-SCJ-SDG

PLAINTIFFS, )

v. )

BRAD RAFFENSPERGER, )

DEFENDANT. )  
-----

30(b)(6) DEPOSITION OF JULIE BOLEN

(TAKEN by DEFENDANTS)

ATTENDING VIA ZOOM IN COBB COUNTY, GEORGIA

JANUARY 13, 2023

ALSO PRESENT: Caren E. Short, Esq.  
Thomas Tai, Esq.  
Leah Ritter

REPORTED BY: Meredith R. Schramek  
Registered Professional Reporter  
Notary Public  
(Via Zoom in Mecklenburg County,  
North Carolina)

1 A Okay.

2 Q Great. Thank you.

3 Ms. Bolen, will you please state your full  
4 name for the record.

5 A Okay. My legal name is Julia, J-u-l-i-a;  
6 middle name Carolyn; last name Bolen, B-o-l-e-n.

7 Q And what is your current address?

8 A 1700 Macby, M like "mother," -a-c-b-y Drive,  
9 Marietta, Georgia 30066.

10 Q Okay. Marietta. So that's Cobb County.  
11 How long have you lived in Cobb County?

12 A Around 25 -- well, probably now, close to  
13 27 years.

14 Q Okay. And before we get started too far into  
15 this, I have a couple just quick questions to ask you  
16 for the record.

17 Are you currently taking any medications that  
18 might keep you from fully and truthfully testifying  
19 today?

20 A No.

21 Q And do you have any medical conditions that  
22 might keep you from fully and truthfully testifying  
23 today?

24 A No.

25 Q Great. And are you located at that address

1 and you're on the board. How many board members does  
2 the League have?

3 A Probably right now, 12 or 13.

4 Q Okay. And do they all -- do they -- does  
5 each board member have a subset of responsibilities  
6 similar to -- so you have a redistricting -- you're the  
7 chair of the redistricting, I guess, committee; is that  
8 right?

9 A Yes.

10 Q And does each board member also chair some  
11 other subcommittee?

12 A Each board member has some responsibility.  
13 Some of them have a committee and some of them don't.

14 Q Okay. Is this a full-time position?

15 A It is a volunteer position.

16 Q Okay. How long do you work with the League  
17 of Women Voters?

18 A I've been on the state board for four years  
19 and I've been a member probably six or seven years.

20 Q Okay. As a board member, what is your  
21 position, what kind of duties does your position  
22 entail?

23 A The board meets monthly. We try to set plans  
24 for whatever's coming up in the year. We have a  
25 convention every other year. We have another meeting



1 part of the League, the League has been around a very  
2 long time. But since I've been a part of the state  
3 league for the last four years, documents are kept in  
4 e-mails and Google Drives. I have an e-mail that's  
5 Redistricting@LWVGA.org. And so whoever takes over  
6 redistricting when I'm gone still has that same set of  
7 documents and will add to them.

8 Q Does the League have a method for kind of  
9 monitoring the time put in by its volunteers and  
10 members?

11 A There's no formal method.

12 Q Would you say there's an informal method for  
13 monitoring the time put in by the League's volunteers  
14 or members?

15 A I don't think we've tried to quantify it.

16 Q Okay. Has the League -- strike that.

17 Since the 2021 Georgia redistricting maps  
18 were signed into law, has the League made any efforts  
19 to assist voters as a result of that law?

20 A Yes.

21 Q And what were those efforts?

22 A We've done a number of public education types  
23 of events where they were mostly Zoom events, sometimes  
24 in person. The state has and our local league has.  
25 The state league often worked with the local league

1 through the process so people understood what was going  
2 on. We encouraged them to weigh in and make their  
3 concerns known.

4 Many of our members testified at various  
5 hearings that the redistricting committees held. They  
6 held some across the state. We had members at almost  
7 every one of those. They held, of course, committee  
8 hearings during the process. People sent e-mails and  
9 called their legislators. They wrote postcards en  
10 masse to the legislators and the legislators on the  
11 committees.

12 Several of our leagues did door knocking,  
13 where they went out in neighborhoods and talked to  
14 people and left information about redistricting, that  
15 it was going on and that it was something people would  
16 want to pay attention to.

17 And post redistricting, there's been a  
18 tremendous effort. So people were aware district lines  
19 had changed, they might be represented by different  
20 people, how to find the information about their  
21 potentially new district, where to vote.

22 So lots and lots of work has gone on around  
23 that.

24 Q Okay. Do you have any documents reflecting  
25 that work? That you -- well, let me ask that question

1 Q I think you kind of alluded to this a little  
2 earlier in your response, but can you explain for me  
3 what activities that the League has altered or changed  
4 as a result of Georgia's 2021 redistricting plans in  
5 this action?

6 A I think that we have spent effort looking at  
7 maps, thinking about maps, educating people about maps,  
8 thinking about what we can do to try to rectify the  
9 situation given that some voters are being treated  
10 unfairly.

11 Q Is it true, though, that you -- that the  
12 League of Women Voters Georgia would be looking at maps  
13 regardless if it was a year where there was  
14 redistricting going on?

15 MS. LOVE: Objection.

16 BY MR. JACOUTOT:

17 Q I'll rephrase it.

18 Is it true that the League of Women Voters of  
19 Georgia would be looking at maps if there's a  
20 redistricting -- if there's a redistricting law at the  
21 Georgia General Assembly?

22 MS. LOVE: Objection.

23 BY MR. JACOUTOT:

24 Q You can answer. Unless you'd like me to  
25 rephrase.

1           A       We will always be watching the redistricting  
2       process. But the process was very worrisome and we  
3       spent a lot of effort while the process was going on  
4       trying to get it to move to a more fair, you know, and  
5       transparent process. So that took a lot of effort.

6           Q       And what were you unable to do as a result of  
7       that effort that you just described?

8           MS. LOVE: Objection.

9           You can answer.

10          THE WITNESS: Okay. We have a -- as I  
11       mentioned, we're mostly volunteers, nearly all  
12       volunteers. So we have finite resources.

13               Normally, we would be trying to educate --  
14       register voters and educate them about voting. We had  
15       an extra heavy lift because of SB 202 that changed --  
16       dramatically changed Georgia's voting laws. So we had  
17       a ton of work to do just on helping people be able to  
18       vote after that law passed. And we couldn't do as much  
19       as we would have liked to do or needed to because the  
20       redistricting process had a lot of problems with it.

21               So our resources couldn't be put on what we  
22       would consider, you know, our normal -- something that  
23       was really, really important and in line with our  
24       normal work.

25

1 Q Are you able to identify or quantify -- let  
2 me rephrase that.

3 Are you able to quantify the amount of hours  
4 that volunteers and members of the League have had to  
5 redirect from its traditional work to work related to  
6 the Georgia 2021 redistricting plan?

7 A We don't collect hourly information like  
8 that.

9 Q Okay. Does anybody sort of informally --  
10 when they carry out a task, do they informally report  
11 to the League about what they did and what -- and how  
12 long they spent on a task?

13 A We don't ask people to do that.

14 Q Okay. What kind of work is the League doing  
15 to address the changes made by the Georgia 2021  
16 redistricting maps?

17 A What are we currently doing?

18 Q Mm-hmm. I'm sorry. I broke my own rule.

19 Yes.

20 A Okay. We are obviously engaged in this  
21 lawsuit trying to get new maps redrawn. So that's one  
22 thing. We still have to educate about the maps that  
23 are in place because that's how they're voting now. So  
24 we continue doing that.

25 And we know there's a huge gap of knowledge

1 for people because we got lots and lots of calls about  
2 people being confused about what district they were in,  
3 where they went to vote, and all that kind of thing.  
4 So that's something we're always doing.

5 Q Would you say that that's typical work when  
6 there's a new map -- strike that.

7 Would you say that the educating of  
8 constituents, members of the public about the maps and  
9 their respective districts, is that typical when  
10 there's a new map drawn through the redistricting  
11 process?

12 A There will be some of that for sure.

13 Q Are you able to identify any personnel or  
14 members that had their usual tasks changed as a result  
15 of the Georgia 2021 redistricting map?

16 MS. LOVE: Objection.

17 You can answer.

18 THE WITNESS: I think in a volunteer  
19 organization, they're just -- volunteers are just not  
20 tracked like that. But we do stay in very close touch  
21 with our 11 local leagues. And so we know that, yes,  
22 indeed, people did spend a lot of additional time on  
23 redistricting across the state.

24 BY MR. JACOUTOT:

25 Q How are you able to know that if you're not

1 You can answer.

2 THE WITNESS: I can answer? Okay.

3 We have a membership chair who has a roster  
4 of all the places where our members live. So we can  
5 put that against the congressional maps to see if we  
6 have members in all of those districts.

7 BY MR. JACOUTOT:

8 Q So it's not necessarily that a member came to  
9 you -- excuse me. Strike that.

10 It's not necessarily that a member came to  
11 the League and said, "I'm in one of these districts and  
12 I'm affected"?

13 MS. LOVE: Objection.

14 You can answer.

15 THE WITNESS: Yeah. In some cases, they did;  
16 and in other cases, we identified them.

17 BY MR. JACOUTOT:

18 Q What percentage -- strike that.

19 What percentage of the League's work is  
20 focused on individuals affected by the 2021  
21 redistricting maps would you say?

22 A I really don't have a basis to quantify that?

23 Q Okay. Would you say that most of the  
24 League's work related to the 2021 Georgia redistricting  
25 maps involves this litigation?

1 A No. There was a broad array of work around  
2 the 2021 maps.

3 Q And what was that broad array of work?

4 A So it was educating people about that the  
5 process was going on and what we would desire to see in  
6 a fair process.

7 We -- so tell me your question again to make  
8 sure I'm not going off track here. Repeat your  
9 question.

10 Q Yeah, sure. I believe you responded to my  
11 question about -- well, I'll go through it.

12 First I asked you, you know, whether most of  
13 your work related to the 2021 redistrict maps involved  
14 this litigation. You responded that, no, there was a  
15 broad array of work done for that.

16 Then I asked you if you could describe that  
17 broad array of work.

18 MS. LOVE: Objection.

19 THE WITNESS: Okay. So I would probably  
20 characterize our work as preventing what happened with  
21 these maps. We worked hard to engage the public and  
22 work with partner organizations and get information out  
23 and encourage people to express their opinions to their  
24 legislators and the committees, all in an effort to  
25 help those legislators understand that the public wants



1 a fair and open and transparent process. They want to  
2 have a chance to have meaningful input.

3 So a lot of work went on around that notion,  
4 that we wanted good maps and we were going to try to  
5 prevent bad maps.

6 BY MR. JACOUTOT:

7 Q Okay. And that -- and you would agree with  
8 me that that work all took place before the Georgia  
9 2021 maps were signed into law; correct?

10 MS. LOVE: Objection to form.

11 You can answer.

12 THE WITNESS: Am I supposed to --

13 MS. LOVE: Unless I direct you not to answer,  
14 you can answer.

15 THE WITNESS: Okay.

16 A lot of work went into prevention, it's  
17 true, and then after the fact, trying to come up with a  
18 way to achieve the objective of having fair maps where  
19 certain voters are not mistreated.

20 MR. JACOUTOT: I'm not sure I understood that  
21 response.

22 Could the court reporter read that back?

23 (Record read as requested.)

24 BY MR. JACOUTOT:

25 Q Now, Ms. Bolen, I want to focus on that

1 portion of the response that relates to "then after the  
2 fact."

3 "After the fact" is what you're referring to  
4 as the passage of the law; correct?

5 A Right.

6 Q Okay. Now, that work would primarily  
7 encompass -- or excuse me.

8 That work that you're referring to after the  
9 fact, would that not primarily be this litigation, or  
10 was there other work as well?

11 A There was a lot of work related to helping  
12 people even know what district they were in. And  
13 because these maps are so bad -- I live in District 6,  
14 one of the areas we're talking about in this  
15 litigation. And hundreds of thousands of people were  
16 moved out of District 6 and other people were moved  
17 into District 6.

18 So it really was a huge shift of population,  
19 and trying to even reach voters to know what had  
20 happened was a pretty big lift. And that was a rather  
21 stunning change, I think, that we didn't see in most  
22 parts of the state.

23 So that's just an example of some of the harm  
24 caused by these bad maps.

25 Q But you would agree with me that

1 differently now since this was in '73. Because, you  
2 know, we say our mission is empowering voters and  
3 defending democracy, which is probably a really concise  
4 way of saying what we see here. But I think they're  
5 parallel.

6 (Exhibit 3 Marked for Identification.)

7 BY MR. JACOUTOT:

8 Q Okay. And I'm going to actually direct you  
9 to the bylaws as well. They're a little more recent.  
10 So let me pull those up and send them over. Those will  
11 be -- the bylaws of the League of Women Voters of  
12 Georgia will be marked as Exhibit 3.

13 A Okay.

14 Q And I'll let you know when I've marked them  
15 and sent them to you so you can refresh. You should be  
16 able to refresh and view Exhibit 3.

17 A Okay.

18 Q And if you can look at that first page,  
19 Article 2, it says, "Purposes and Policy." And review  
20 Section 1, "Purposes."

21 A Okay.

22 Q Okay. And between the articles of  
23 incorporation and these bylaws, which if you'll note  
24 down at the bottom left-hand corner, it says they were  
25 approved May 2019.

1 Q How did the League make this determination?

2 A We used our membership roster to look at --  
3 first look at ZIP codes that were part of the three  
4 disputed districts. And if ZIP codes were split, then  
5 we had to go further to make sure the member's address  
6 was indeed in the district.

7 Q And how many members did the League determine  
8 were affected?

9 A We have members in every district. I don't  
10 know the number because the membership does fluctuate  
11 over time a little bit. So we have to almost go back  
12 and do the process a second time to count.

13 Q Okay. So who is the member that -- member or  
14 members that the League is representing for the  
15 purposes of this action who has been impacted by the  
16 2021 redistricting plans?

17 MS. LOVE: Objection. I'm going to direct  
18 the witness not to answer and divulge any membership  
19 identity information. That information is protected  
20 for those individuals under their association rights to  
21 the First Amendment. And we have discussed this in  
22 prior discovery dispute in meet and confer.

23 So I'll direct you not to answer that one.

24 BY MR. JACOUTOT:

25 Q To be clear, I'm not asking for any sort of

1 whether there were any activities that the League was  
2 unable to do because it was focused on redistricting.

3 And I think earlier you said that it was  
4 mostly, like, the amount of focus you were able to have  
5 in particular areas.

6 Is that reflective of your testimony?

7 A Yes.

8 Q Can you think of any examples of a specific  
9 activity that you would have liked to do but couldn't  
10 do because you were focused on redistricting?

11 A One thing that some of our leagues do and  
12 we'd like to see all of our leagues do is to work with  
13 the high school and college -- high schools and  
14 colleges to make sure as people become old enough to  
15 vote that we help them register and we help them get  
16 comfortable with the voting process. And that's  
17 something that we really couldn't push forward with or  
18 expand because of dealing with redistricting. So  
19 that's just one example, but something that we've  
20 identified as being important.

21 Q And I guess why was the League unable to  
22 partake in that activity? Like, how did redistricting  
23 stop you from participating in that activity?

24 A I think it's just a matter of the bandwidth  
25 of volunteers, that it -- if you ask people to do too

CERTIFICATE OF REPORTER

STATE OF NORTH CAROLINA )

COUNTY OF MECKLENBURG )

I, MEREDITH R. SCHRAMEK, hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

I further certify that I have no direct contract with any party in this action, and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This, the 26th day of January, 2023.



MEREDITH R. SCHRAMEK, RPR, CCR 3040

# EXHIBIT 23

## (Filed Under Seal)

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

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )

*Plaintiffs,* )

v. )  
STATE OF GEORGIA, et al. )

*Defendants.* )

---

COMMON CAUSE, et al., )

*Plaintiffs,* )

v. )  
BRAD RAFFENSPERGER )

*Defendant.* )

Case No. 1:21-CV-5338- ELB-SCJ-SDG

Case No. 1:22-CV-00090- ELB-SCJ-SDG

**DECLARATION OF JULIE BOLEN IN OPPOSITION TO DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT**

I, Julie Bolen, declare:

1. I reside in [REDACTED], in [REDACTED] where I have lived for approximately for 27 years.

2. I am the current Chair of Redistricting and a board member of the League of Women Voters Georgia (the “League”). I have been a board member for the past four years.



3. I am currently a member of the League, and I have been a member for the past six or seven years.

4. The League has approximately 549 members in Georgia.

5. The League has 23 members in Congressional District (“CD”) 6.

6. The League has 22 members in CD 13.

7. The League has 56 members in CD 14.

8. In my position, I have personal knowledge of the methods the League uses to keep track of its members, including their locations, and have access to the League’s files maintained in its ordinary course of business concerning the League’s membership and the identities and addresses of its members. This Declaration is based on my personal knowledge and review of the League’s membership records.

9. The League’s Membership Chair maintains a roster of all the places where our members live. Therefore, the League can overlay those addresses against the congressional maps to determine whether the League has members in CD 6, CD 13, and CD 14 (the “Challenged Districts”).

10. Specifically, the League used its membership roster to obtain member addresses. Those addresses were then geocoded to determine the number of members that reside in each of the Challenged Districts. Based on this rigorous vetting process, I confirm that the League has members in every district.

11. The League's membership number is reliable because the League regularly recounts its membership numbers, using the same process described above.

12. The League historically keeps its membership list and member information confidential and takes steps to protect its members' personal privacy.

13. Based on my experience in redistricting and my involvement with the League, I believe that the specific identification of our members would place their safety and privacy in jeopardy.

14. In the current political climate, private individuals are finding themselves increasingly vulnerable to public attacks, conflicts, and doxing.

15. As a local example, a Fulton County election worker was harassed after the 2020 elections, and school board meetings have been a forum for public attacks. A woman who was hired as an administrator focused on diversity, equity, and inclusion initiatives for the Cherokee County School District was tormented by members of the public until she quit.

16. As a result, community members have experienced a chilling effect on their desire and capacity to be publicly affiliated with even nonpartisan organizations that engage in civic issues.

17. The League is therefore extremely careful with its members' identifying information, and does not typically disclose such information.

18. Nevertheless, in an abundance of caution and to ensure the League is able to vindicate its members' most essential and fundamental right to be represented in government, the League identifies one member from each of the Challenged Districts below.

19. The League identified these members using the same process as described above. The League obtained consent to provide their identities to the Court and to Defendant's counsel on the understanding that it would be filed under seal and not publicly.

20. [REDACTED] is a resident of CD 6 of voting age. [REDACTED] resides at [REDACTED] is an active member of the League.

21. [REDACTED] is resident of CD 13 of voting age. [REDACTED] resides at [REDACTED] is an active member of the League.

22. [REDACTED] is a resident of CD 14 of voting age. [REDACTED] resides at [REDACTED] is an active member of the League.

23. I am a resident of CD 6 of voting age. I reside at [REDACTED]  
[REDACTED]. I am an active member of the League.

24. The passage of SB 2EX has forced the League to divert personnel, time, and resources from its usual activities, and, as a result, has prevented the League from engaging in its own projects.

25. The League engaged in numerous additional activities solely because of the State of Georgia's redistricting. This included conducting door knocking in neighborhoods, talking to people, and leaving information about redistricting for people to read.

26. SB 2EX diverted the League from doing its normal work, including voter registration and assisting voters. The League was unable to complete its typical partnership with high schools and colleges where it typically educated students with respect to voting, and helped them register as they became old enough to do so.

27. As parts of its efforts to combat the illegal redistricting, the League worked hard to engage the public, work with partner organizations, and get information out to encourage people to express their opinions to their legislators and committees. The League made an organized effort to help the community advocate to legislators for a public, fair, open, and transparent process.

28. The League could not engage its typical activities because it had to divert attention and resources to its redistricting efforts in light of the enacted congressional map.

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

Executed in Marietta, Georgia, on this 26th day of April 2023.

By: /s/ Julie Bolen

Julie Bolen

# EXHIBIT 24

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

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )

*Plaintiffs,*

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BRAD RAFFENSPERGER )

*Defendant.*

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) Case No. 1:21-CV-5338-ELB-SCJ-SDG

) Case No. 1:22-CV-00090-ELB-SCJ-SDG

**Expert Report of Dr. Moon Duchin**

# Analysis of Race and Redistricting in Georgia

Moon Duchin  
Professor of Mathematics, Tufts University  
Senior Fellow, Tisch College of Civic Life

January 13, 2022

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# 1 Background and qualifications

I am a Professor of Mathematics and a Senior Fellow in the Jonathan M. Tisch College of Civic Life at Tufts University. At Tisch College, I am the director and principal investigator of an interdisciplinary research group called the MGGG Redistricting Lab, focused on geometric and computational aspects of redistricting. My areas of research and teaching include the structure of census data, the history of the U.S. Census, the design and implementation of randomized algorithms for generating districting plans, and the analysis of redistricting more broadly. In 2019, I was awarded a major grant from the National Science Foundation to study *Network Science of Census Data*.

I am compensated at \$400/hour for my work in this case. I have previously written reports and provided testimony by deposition, a hearing, or at trial in North Carolina, Pennsylvania, Wisconsin, Alabama, South Carolina, and Texas.<sup>1</sup> A full copy of my CV is attached to this report.

## 1.1 Assignment

I have been asked to examine the Congressional, state Senate, and state House districts enacted in Georgia this year in connection with challenges under the Voting Rights Act of 1965 (VRA) and the U.S. Constitution.

<sup>1</sup>*NC League of Conservation Voters, et al. v. Hall, et al.* No. 21-cvs-500085 (Wake Cnty. Sup. Ct. 2021); *Carter v. Chapman*, No. 7 MM 2022, 2022 WL 702894 (Pa. Mar. 9, 2022); *Johnson v. Wis. Elections Comm'n*, No. 2021AP1450-OA, 2022 WL 621082 (Wis. Mar. 3, 2022); *Milligan, et al. v. Merrill, et al.*, Case No. 2:21-cv-01530-AMM and *Thomas, et al. v. Merrill, et al.*, Case No. 2:21-cv-01531-AMM (N.D. Ala. 2021); *SC NAACP et al. v. Alexander, et al.*, Case No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.) (three-judge ct.); *TX NAACP et al. v. Abbott*, Case No. 1:21-CV-00943-RP-JES-JVB.

In particular, I review the maps' conformance with traditional districting principles (§6), then supply demonstration maps for the "Gingles 1" prong of a VRA challenge. Using a notion of district "effectiveness" based on electoral history (§5), I show that it is readily possible to draw additional majority-minority districts, while simultaneously increasing the number of effective districts (§7). These effective districts are shown to be highly likely to provide an opportunity for Black and Latino voters to elect candidates of their choice.

I have also assessed the maps to investigate the possibility of excessively race-conscious line-drawing (§10), especially noting when traditional districting principles have been undermined in a manner that results in "packing" and "cracking"—the related practices of over-concentrating Black and Latino voters on one hand, or splitting communities and dispersing their voters over multiple districts on the other. I have considered whether or not the design of the districts ultimately leads to discernible dilution of voting opportunity for Black voters in Georgia, or for coalitions of Black and Latino voters, and have found ample evidence to support that conclusion.

All work in this report was completed by me and by research assistants working under my direct supervision.

## 1.2 Materials

Materials consulted in the preparation of this report include the following.

- A major source is Census data, primarily the Decennial Census releases (i.e., the PL 94-171). Other data products from the Census Bureau, including the American Community Survey and the TIGER/Line shapefiles, were also used.
- For priorities and criteria, I consulted the "2021–22 Guidelines for the House Legislative and Congressional Reapportionment Committee." These are reprinted in full in the corresponding publication by the Senate Committee on Reapportionment and Redistricting.
- Shapefiles for the enacted plans are available on the state's redistricting website, hosted at [legis.ga.gov](https://legis.ga.gov).
- A collection of precinct shapefiles with historical election data joined to the shapes was provided by counsel, as well as addresses for incumbent representatives. I was also provided with written transcriptions of oral testimony in public hearings in Georgia about redistricting, and with corresponding written communication.

## 2 Summary of findings

- Census data shows that the state of Georgia is rapidly diversifying, and in fact now has a population very nearly evenly split between White people and people of color. At the same time, it has shifted to become what we might call "bright purple," with recent elections repeatedly demonstrating that candidates preferred by Black and Latino voters can be elected by simple majority on a statewide basis.
- At a high level, an examination of recent electoral history shows that the enacted plans at all three levels are conspicuously uncompetitive, which has been fueled by acutely race-conscious moves in the recent redistricting. In particular:
  - A Congressional district that had proved to perform for the preferences of Black and Latino voters—CD 6—has been targeted to eliminate electoral opportunity. This was achieved by excising parts of urban counties and adding conservative White counties to the north of the benchmark configuration.
  - In a ripple effect from the reconfiguration of CD 6, a dense, urban, largely Black residential segment of Cobb County has been submerged in CD 14.

- On the western edge of Georgia, CD 3 has been drawn to retain its character as a firewall between racially and politically diverse parts of the state in metro Atlanta and the Southwest region. Meanwhile, CD 13 has been kept highly packed, which is cemented in the enacted plan through race-conscious county splitting.
  - In the enacted Senate map, numerous districts that had trended into diverse and competitive population configurations were targeted for "dismantling," i.e., were re-drawn in a way that splits the population of the benchmark district across numerous new districts. This is especially visible in the reconfiguration of SD 17 and 48, which flouts traditional districting principles and creates districts that lock out opportunity.
  - There is strikingly low core retention in the enacted House plan, with roughly three in every five Georgia residents assigned to a new district today relative to the benchmark plan. This dovetails with a pattern of "dismantling" districts in a way that usually eliminates electoral opportunity for Black and Latino voters, using racially imbalanced transfers of population.
- I have introduced a label of district "effectiveness" in §5: by definition, a district is deemed effective if candidates of choice for Black and Latino voters can frequently win both primary and general elections. To make this concrete, I have used a list of four primary and eight general statewide elections selected as being highly probative for the preferences of Black and Latino Georgians. To be effective, a district must have an electoral history such that the candidate of choice would win in at least 3/4 primary elections and 5/8 general elections from this dataset. I have confirmed that this is well aligned with actual 2022 electoral performance at the Congressional and state legislative level.
  - A review of metrics associated with traditional districting principles (and other principles cited in the state's redistricting guidelines) is presented in §6. My alternative plans are shown to be highly compact, to respect the integrity of counties and cities, and to be far more cognizant of the integrity of state precincts than the enacted plans.
  - I present Gingles 1 alternatives on a regional/district cluster basis in §7. These plans increase both the number of majority-BHVP districts and the number of majority-BHCVAP districts, relative to the state, while also securing the "effective" label on the basis of electoral history. The modular design of the legislative alternatives will make it easy to mix and match plans from different clusters.
  - If we foreground effectiveness instead of majority demographics, we find that districts can frequently be effective even well under the 50%+1 demographic threshold. This provides helpful examples leading in to a discussion of racial gerrymandering in the following section.
  - Counties are often split in a racially sorted way, beyond what the partisan geography would suggest from a race-neutral process. In many cases this secures a high partisan differential as well; in some cases, the racial differential significantly exceeds the partisan gap.
  - It is extremely frequent for precinct splits to show major racial disparity. If mapmakers were using cast vote history to track partisan lean, as is frequently done around the country, then these splits of state precincts are especially telling, since the vote history can not provide a partisan basis for the decision. These splits are shown to essentially always align with packing and cracking. Again, my alternative maps show that far less precinct splitting is possible.
  - Public input, such as the record of strong pushback against the targeting of CD 6 and the encroachment of CD 14 into Cobb, also explains why the enacted plans are dissonant in terms of shared community interests.

### 3 Demographics of Georgia

#### 3.1 Regions, counties, and cities

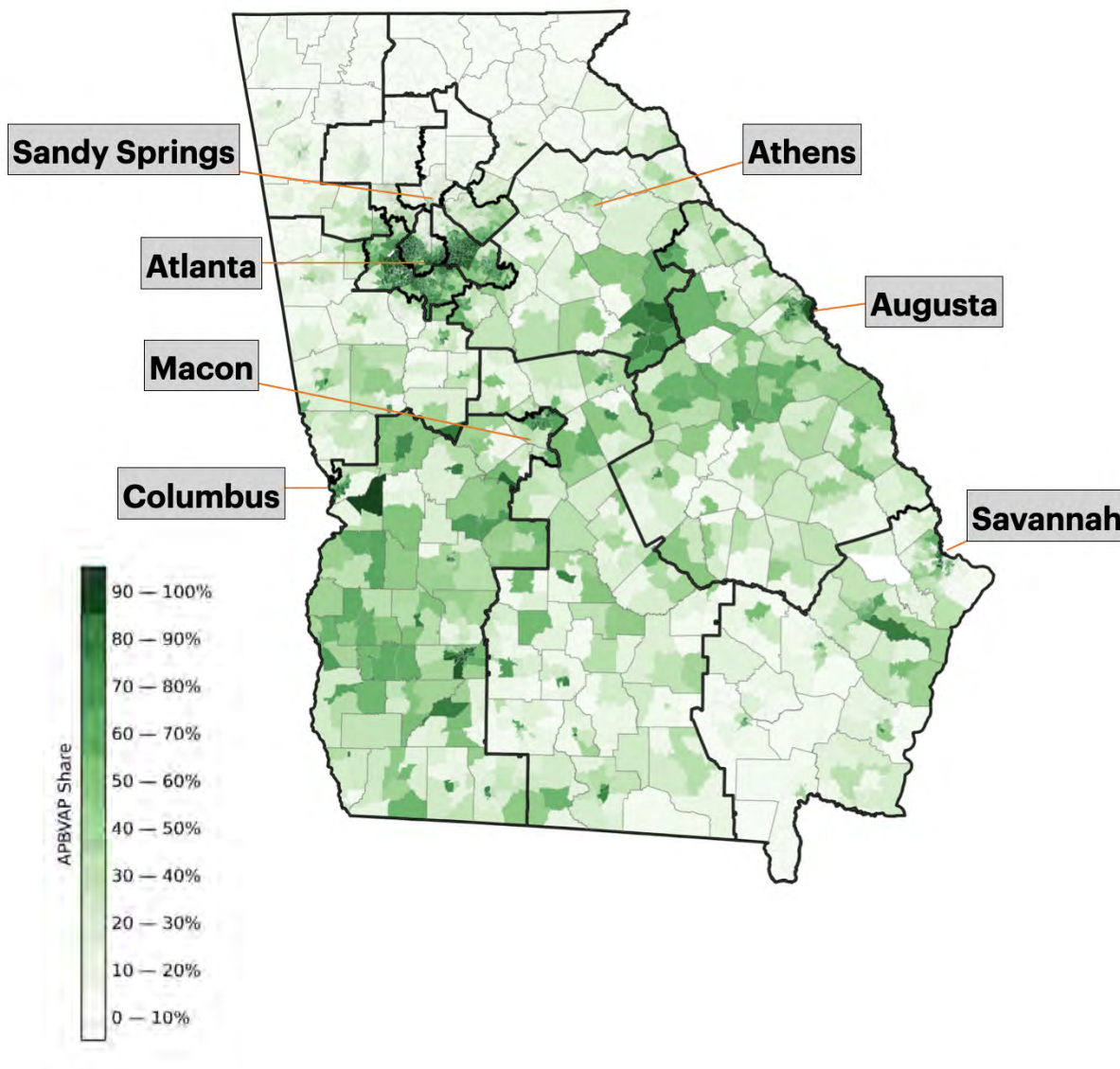


Figure 1: Choropleth of Black voting age population by state precinct, with the enacted Congressional map overlaid. County lines are shown in gray. The Atlanta metro area has dense Black population, while high proportions of Black residents in smaller cities and rural areas can be found in the swath of the state from Columbus to Augusta, broadly called Georgia's "Black Belt" region.

Georgia has 159 counties, the second highest number in the nation (after Texas with 254). Georgia's counties vary in population from Fulton County, with over a million residents, to Taliaferro County, with just 1559 residents, so that they differ by a factor of over 680 $\times$ . Twenty-two of the counties are majority-Black, from DeKalb (pop. 764,382) to Taliaferro.

In Georgia, the cities proper are not very populous; even Atlanta has under 500,000 people by the 2020 Census numbers, smaller than the ideal Congressional district population of 765,136. However, the Atlanta metro area (formally the "Atlanta–Sandy Springs–Alpharetta, GA Metropolitan Statistical Area") is the eighth largest in the country, with over six million residents (6,089,815), making up nearly 57% of Georgia's total population.

### 3.2 Sources of population data

Apportionment and redistricting was the fundamental motivation for the establishment of the U.S. Census. The primary source of ground-truth data for redistricting is the Decennial Census tables in the PL94-171 (also called the *redistricting data release*). There are many reasons to rely on the 2020 Decennial data: it is the most recent available, it is based on a more extensive enumeration of the population (rather than a survey), it is available on the smallest geographic units (census blocks), it offers a high level of detail in its categories of race and ethnicity, and it includes both total population (TOTPOP) and voting age population (VAP).

An important secondary source of data, also produced by the Census Bureau, is the American Community Survey, or ACS. This has the advantage of being collected every year rather than at ten-year intervals, and it includes an estimate of citizen voting age population (CVAP), but this trades off with a number of well-known caveats. Since it is survey-based, it is known to have wider error bars on small geography: accordingly, the Bureau only releases single-year estimates at the tract level; 5-year estimates are released at the level of block groups, but this is still not sufficiently detailed to get exact totals on electoral districts. Furthermore, the ACS racial and ethnic categories are significantly simplified relative to the Decennial data, so that for instance it is not possible to tabulate Any-Part Black population with the same set of multiracial categories or even to tabulate Afro-Latino (Black and Hispanic) population. In addition, the use of a 5-year average will mean that the numbers are somewhat out of date, since even the most recent currently available data draws partly from 2016, which is quite a long time ago in a rapidly diversifying state. Finally, the 2020 ACS was so badly compromised by the COVID pandemic that the Bureau has cautioned people to treat the numbers that year as "experimental."<sup>2</sup>

For these reasons I have chosen to emphasize VAP in discussing the demographics of districts in this report, such as when counting the majority-Black districts in a plan. However, the plaintiffs' claims involve a coalition of Black and Latino voters, and the voting eligibility rate for Latino voters can be significantly lower than other groups, particularly due to a lower rate of citizenship. Therefore litigation involving Latino plaintiffs typically uses a secondary data source to validate that Gingles plans meet the 50%+1 threshold. Below, I will rely on estimated CVAP built from block-level adjusted VAP, where the citizenship rate (CVAP/VAP) for Black, Latino, White, and Other residents is pulled from the 2020 5-year ACS on larger geographies, namely census tracts. I judge this to be significantly more accurate than using the 2016-2020 5-year CVAP numbers directly. For one vivid illustration of why this is important, consider that the total voting age population of Georgia is 8,220,274 in the redistricting data, but only 8,011,265 in the 2016-2020 5-year numbers. That is, there is a shortfall of more than 200,000 adults if we pull from the ACS directly.

A full description of racial categories and of the construction of CVAP for this report can be found in Appendix A. In §8 I will confirm that my alternative plans satisfy the Gingles 1 standard for coalition districts using estimated Black and Hispanic CVAP as well as using VAP.

<sup>2</sup>"The Census Bureau will not release its standard 2020 ACS 1-year supplemental estimates because of the impact of the COVID-19 pandemic on data collection. Experimental estimates, developed from 2020 ACS 1-year data[, ] are available on the ACS Experimental Data page. They will not be available on data.census.gov or the Application Programming Interface (API)." From [www.census.gov/data/developers/data-sets/ACS-supplemental-data/2020.html](https://www.census.gov/data/developers/data-sets/ACS-supplemental-data/2020.html), accessed January 4, 2023.



### 3.3 Demographic trends

A snapshot of the demographics of Georgia can be extracted from data products by the Census Bureau, as in Table 1.<sup>3</sup> Below, I will use the abbreviations B, H, BH, W, and POC to denote the share of population (or VAP, etc.) that is Black, Latino, Black and/or Latino, White, and people of color respectively. Detailed definitions of the racial and ethnic groupings can be found in Appendix A.

	All	Black alone	Black (APB)	Hispanic	BH Coalition	AfroLatino	White alone	POC
<b>TOTPOP</b>	10,711,908	3,278,119 30.60%	3,538,146 33.03%	1,123,457 10.49%	4,578,941 42.75%	82,662 0.77%	5,362,156 50.06%	5,349,752 49.94%
<b>VAP</b>	8,220,274	2,462,933 29.96%	2,607,986 31.73%	742,918 9.04%	3,302,581 40.18%	48,323 0.59%	4,342,333 52.82%	3,877,941 47.18%
<b>CVAP</b>	7,598,787	2,422,569 31.88%	2,537,328 33.39%	429,562 5.65%	2,920,522 38.43%	— —	4,285,394 56.40%	3,313,393 43.60%

Table 1: Demographics overview. The TOTPOP and VAP figures are taken from the 2020 Decennial Census. The CVAP figures use citizenship rates drawn from the most recent 5-year ACS (ending in 2020), applied to decennial VAP.

Georgia's fast growth is entirely due to the expansion in the population of people of color. In fact, the (non-Hispanic) White population of Georgia actually dropped from 2010 to 2020—from 5,413,920 to 5,362,156—while the state overall grew by over a million people. As a result, the population share of Black and Latino residents expanded from 39.75% to 42.75% in the time between the 2010 and the 2020 Census data release, while the White population share dropped markedly from 55.88% to 50.06%. Thus, to within a tenth of a percent, current redistricting data finds Georgia evenly split between White residents and people of color.

The steady diversification is visible in the citizen voting age population as well, for which we can get a snapshot each year from the American Community Survey (Table 2).<sup>4</sup>

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>BCVAP</b>	1,961,750 0.3029	2,008,587 0.3049	2,055,423 0.3071	2,096,295 0.3089	2,140,693 0.3110	2,179,729 0.3123	2,228,551 0.3155	2,276,776 0.3182	2,322,275 0.3201	2,376,110 0.3230
<b>HCVAP</b>	188,878 0.0292	210,412 0.0319	230,724 0.0345	245,517 0.0362	263,787 0.0383	282,158 0.0404	290,840 0.0412	306,713 0.0429	324,368 0.0447	344,182 0.0468
<b>BHCVAP</b>	2,150,628 0.3321	2,218,999 0.3368	2,286,147 0.3415	2,341,812 0.3451	2,404,480 0.3493	2,461,887 0.3528	2,519,391 0.3567	2,583,489 0.3610	2,646,643 0.3648	2,720,292 0.3698
<b>POC CVAP</b>	2,239,082 0.3457	2,299,730 0.3491	2,358,789 0.3524	2,415,907 0.3560	2,477,036 0.3599	2,538,250 0.3637	2,603,198 0.3685	2,671,269 0.3733	2,738,577 0.3775	2,811,677 0.3822
<b>WCVAP</b>	4,237,007 0.6543	4,288,602 0.6509	4,335,200 0.6476	4,369,477 0.6440	4,405,843 0.6401	4,440,410 0.6363	4,460,606 0.6315	4,484,704 0.6267	4,516,116 0.6225	4,544,881 0.6178
<b>total CVAP</b>	6,476,089	6,588,332	6,693,989	6,785,384	6,882,879	6,978,660	7,063,804	7,155,973	7,254,693	7,356,558

Table 2: Georgia has seen significant growth in its citizen adult population, and nearly all of it is from communities of color. This table shows the 1-year ACS figures from 2010 through 2019.

<sup>3</sup>As noted in the last section, the American Community Survey (ACS) is based on an annual survey, often presented in 5-year rolling averages, where not all of the same racial and ethnic categories from the PL94-171 are available. Since the methodology, categories, and time periods are different between the ACS and the Decennial data, there is no contradiction in observing WCVAP>WVAP, for instance.

<sup>4</sup>As described above, the 2020 ACS was not recommended for standard use on a 1-year basis, which is why it is excluded from Table 2.

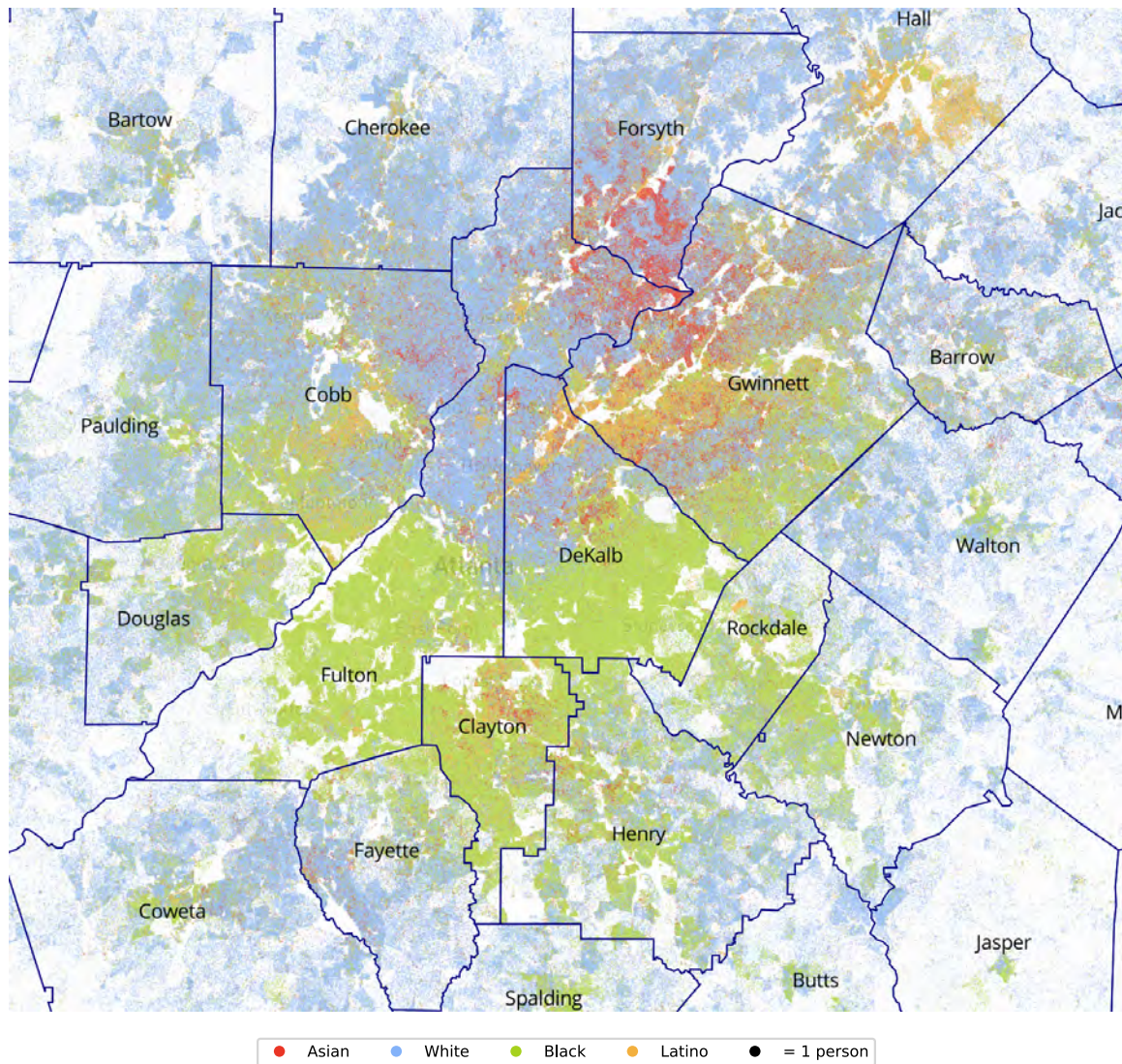


Figure 2: Racial dot density plot in the counties of the Atlanta metro area. Dense concentrations of Black population are visible in Cobb, Douglas, Fulton, Clayton, DeKalb, and southern Gwinnett Counties. Gwinnett is the heart of Georgia's Latino population, and following the I-85/I-985 corridor north connects to a substantial Latino community in Hall County.

## 4 Overview of enacted plans for Congress, Senate, and House

### 4.1 Congress

As discussed in the last section, the last decade has seen substantial growth in the Black and Latino population of Georgia and a reduction in White population. At the same time, and in a climate where the racial polarization between White Georgians and voters of color is essentially undisputed, Black and Latino candidates of choice are now routinely competitive in statewide elections, and now can frequently win outright. Despite this, the newly enacted Congressional plan makes major changes to the benchmark and does so in a way that reduces the number of performing districts for Black- and Latino-preferred candidates from 6 out of 14 (42.9%) to just 5 out of 14 (35.7%).

In 2018, Democratic candidate Lucy McBath won a surprise victory in CD 6, north of Atlanta, unseating Republican Karen Handel. She then defended her seat in 2020. My study of the Congressional plan enacted in Georgia in 2021 is completely consistent with the scenario that line-drawers targeted McBath's district, specifically by removing Black and Hispanic voters from CD 6 and replacing them with White suburban, exurban, and rural voters in Forsyth and Dawson counties. This displacement ripples across CD 11 and ends up submerging Black urban voters in rural CD 14. This is corroborated by the core retention numbers that show that CD 6 was singled out for major reconfiguration (see §10).

Correspondingly, the community of interest narratives supplied to the state in a series of public hearings and communications show that coherent and salient local identities were disregarded in the process: rural, mountainous, and industrial interests in the Northwest counties; metro Atlanta's urban counties with large Black populations and clear shared needs for infrastructure, transit, and housing; and largely suburban Forsyth and Dawson. (See §10.3)

Strikingly, all fourteen new districts had wider than a ten-point margin between Biden and Trump in the 2020 Presidential voting—there are zero remotely competitive districts. In particular, the completely reconfigured CD 6 is now far out of reach for a Black-preferred candidate; Biden had just 42.5% of the major-party vote against Trump in the district. This lean held up in actual Congressional voting under the new lines in 2022, where the closest of the fourteen outcomes was Sanford Bishop's margin of 9.95 percentage points over opponent Chris West in CD 2; every other race was a blowout. The overall effect of the Congressional redistricting in Georgia is the instrumentalization of Black and Latino voters to achieve a profoundly uncompetitive plan in which the line-drawers have gone a long way to locking in the outcomes.

In this section I will show images, and in the following section I will present statistics, for the enacted Congressional plan compared to the benchmark plan from ten years prior. I will also consider a map I have labeled **Duncan-Kennedy**, a draft congressional map released to the public by Lt. Governor Geoff Duncan and Chairman John F. Kennedy on September 27, 2021.



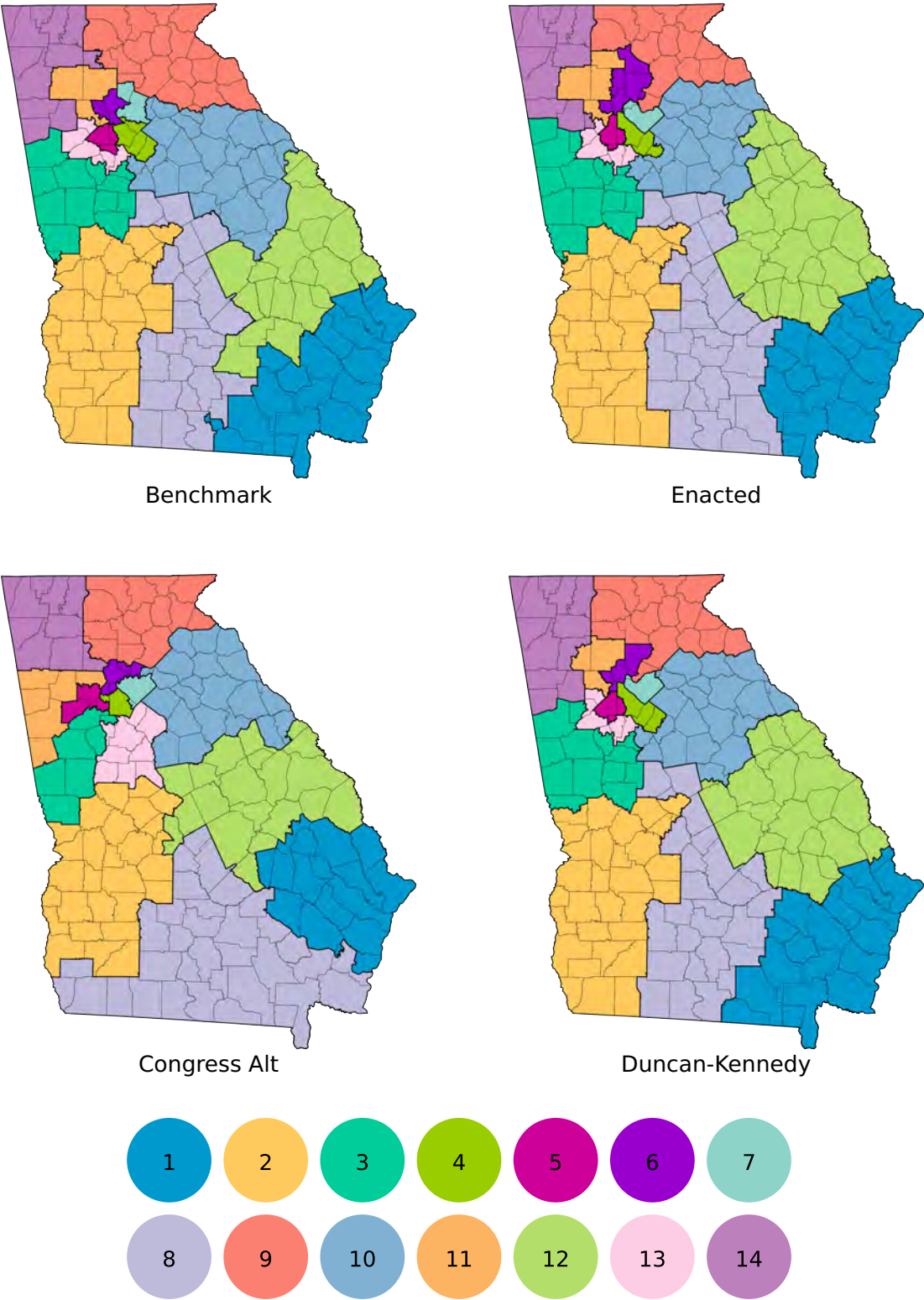


Figure 3: Congressional plans.

## 4.2 State Senate

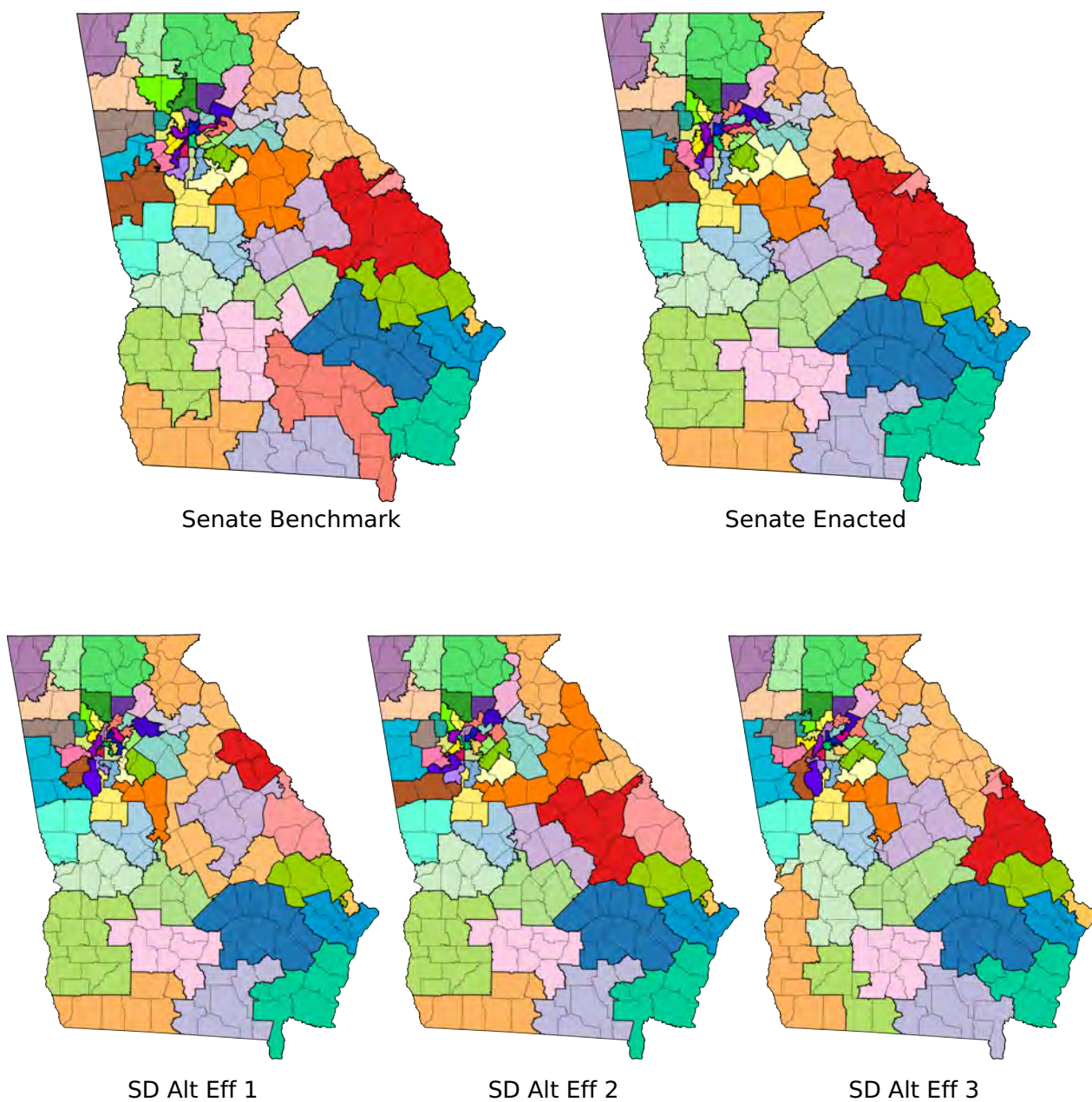


Figure 4: State Senate plans.

The state Senate plan enacted in Georgia is also remarkable in its lack of competitiveness. Despite Georgia's clear status as a new swing state, only one of the districts (SD 48) would have been within a ten-percentage-point margin (i.e., 55-45 or closer) in the Biden-Trump presidential contest of 2020. And indeed, only two of 56 districts (SD 7 and 14) were within a ten-point margin in the actual legislative voting of 2022. (Note that Georgia state Senators stand for election every two years, as for U.S. House and Georgia's state House.) More than half of the districts—30 out of 56—were uncontested.

Below, I will propose alternative districts with a *modular* approach, starting by dividing the 56 districts in the enacted plan into six district clusters, shown in Figure 5. In three of the six—Atlanta, Gwinnett, and East Black Belt—I will present alternative "Gingles 1" plans that increase the number of majority-Black and/or the number of majority-coalition districts, while ensuring that new districts are effective at securing electoral opportunity for Black and Latino voters. I will supplement the Gingles plans with regional maps showing improved effectiveness in additional clusters to create plans that span many regions of the state to form SD Alt Eff 1 and SD Alt Eff 2. Finally, I will offer an all-clusters alternative keyed to increased effectiveness alone, called SD Alt Eff 3. (See Table 10.) This is accomplished while maintaining scores for traditional districting principles that are comparable or superior to those of the enacted plan, and while giving great deference to the enacted plan by reconfiguring its own districts in clusters rather than starting from a blank map.

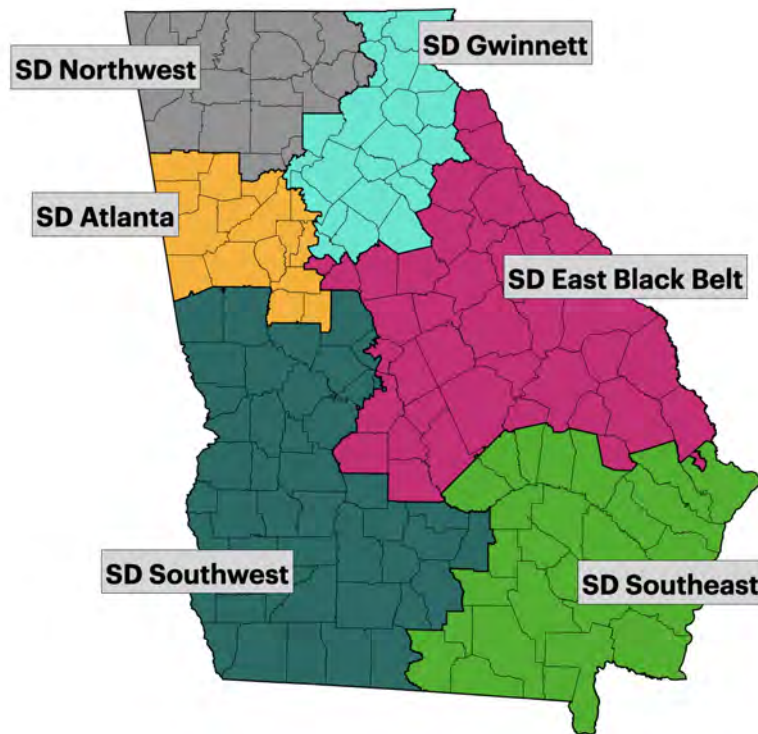


Figure 5: Six "modular" Senate clusters made up of groups of enacted districts. Below, Gingles demonstrative plans will be offered in selected clusters and effectiveness-oriented demonstrative plans will be presented in all six.

### Senate Clusters

- SD Atlanta (14 districts): 6, 10, 16, 28, 30, 31, 33, 34, 35, 36, 38, 39, 42, 44
- SD Gwinnett (16 districts): 5, 7, 9, 14, 17, 27, 40, 41, 43, 45, 46, 47, 48, 49, 50, 55
- SD Southwest (6 districts): 11, 12, 13, 15, 18, 29
- SD East Black Belt (7 districts): 4, 20, 22, 23, 24, 25, 26
- SD Southeast (5 districts): 1, 2, 3, 8, 19
- SD Northwest (8 districts): 21, 32, 37, 51, 52, 53, 54, 56



### 4.3 State House

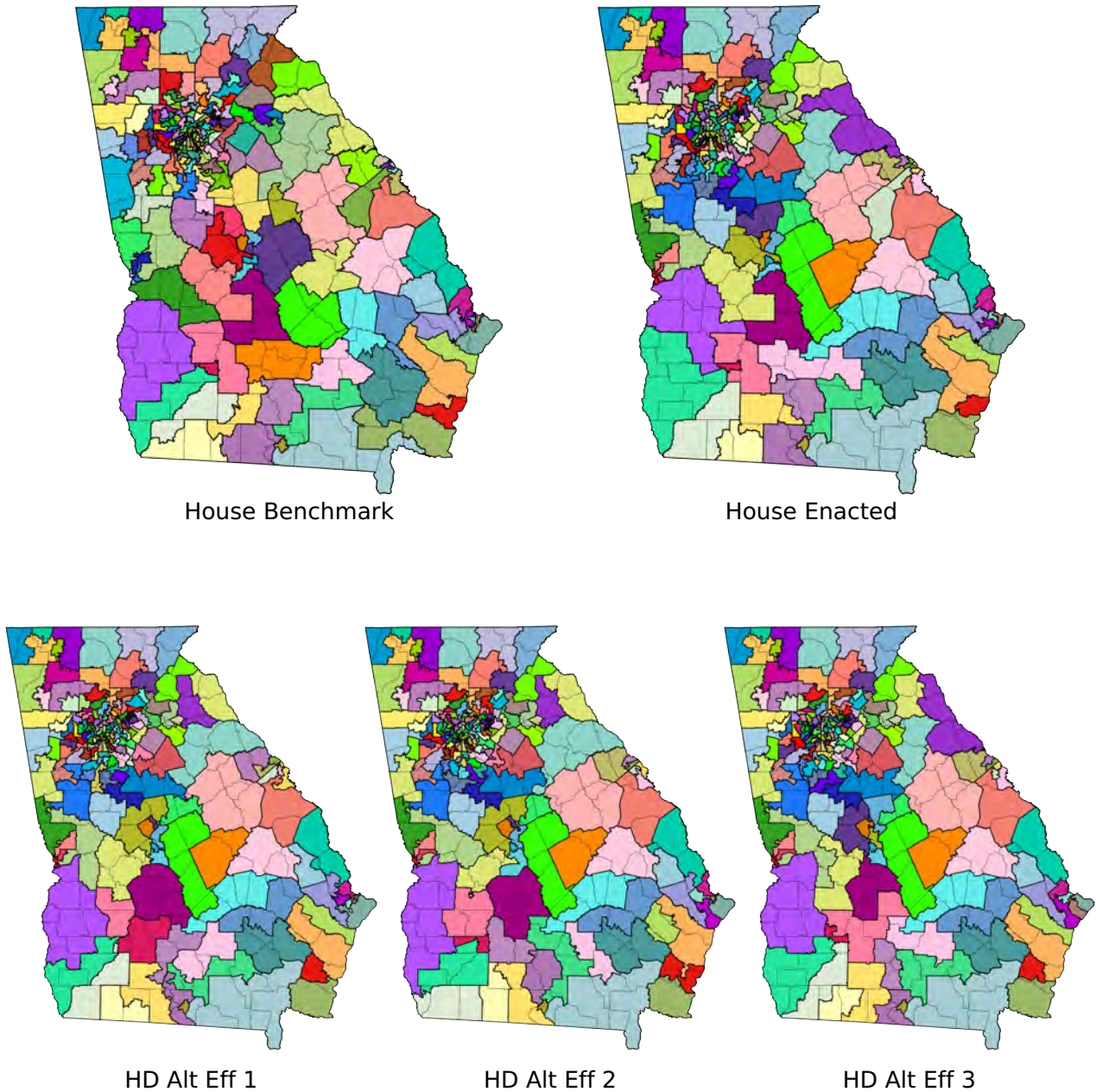


Figure 6: State House plans.

The state House plan repeats the uncompetitive design found in the other levels of redistricting; only fifteen of the 180 districts were within a ten-point margin for Biden-Trump, and only nine (HD 48, 50, 53, 99, 101, 105, 108, 117, and 151) had 2022 legislative outcomes in that range. Like in the Senate, more than half of the House districts—93 out of 180—were uncontested in 2022.

I have extended the modular approach from state Senate to the House, using seven regions formed by clusters of enacted districts, as in Figure 7. Each can be reconfigured to create

additional majority-coalition districts, and I offer up to two demonstration maps per cluster (Alt 1 and Alt 2) as Gingles 1 demonstratives in §7. As overviewed in Table 10, the alternative plans can be completed to highly effective alternatives statewide, which I call HD Alt Eff 1 and HD Alt Eff 2; a third all-clusters effective alternative is also offered, called HD Alt Eff 3.

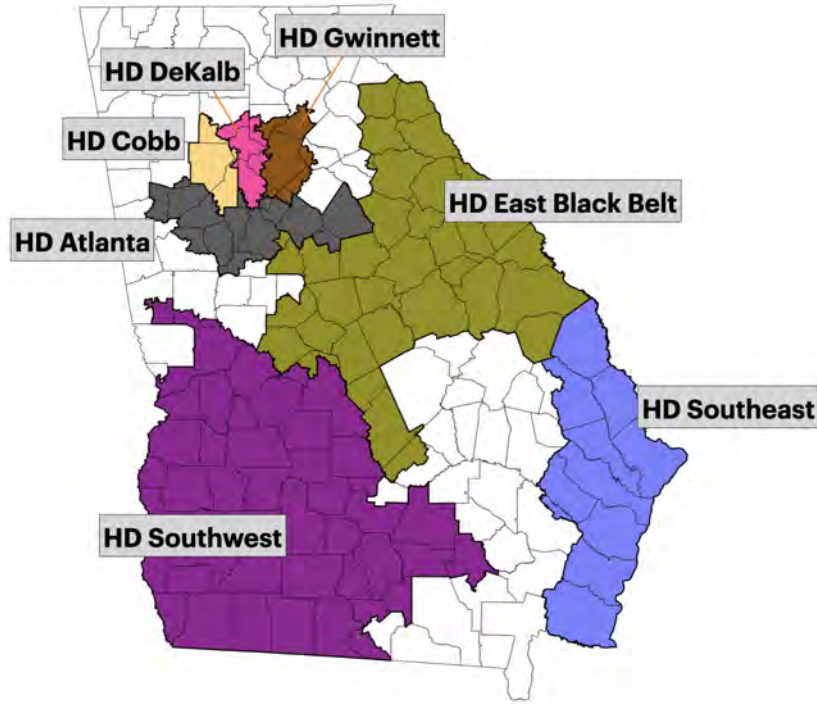


Figure 7: Seven "modular" House clusters made up of groups of enacted districts.

### House Clusters

- HD Atlanta (25 districts): 61, 64, 65, 66, 67, 68, 69, 71, 73, 74, 75, 76, 77, 78, 79, 90, 91, 92, 93, 112, 113, 114, 115, 116, 117
- HD Cobb (25 districts): 20, 22, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 53, 54, 55, 56, 57, 58, 59, 60, 62, 63
- HD DeKalb (22 districts): 21, 24, 25, 47, 48, 49, 50, 51, 52, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 96, 97, 98
- HD Gwinnett (18 districts): 26, 29, 30, 94, 95, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111
- HD Southwest (18 districts): 137, 140, 141, 146, 147, 148, 150, 151, 152, 153, 154, 169, 170, 171, 172, 173, 175, 176
- HD East Black Belt (18 districts): 33, 118, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 142, 143, 144, 145, 149
- HD Southeast (12 districts): 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 179, 180

Together, these cover 138 of the 180 districts in the Georgia House. All of my demonstrative plans will leave the other 42 House districts unchanged.

## 5 Assessing effective opportunity-to-elect districts

The Gingles demonstration maps shown below in Section 7 are presented to satisfy the Gingles 1 condition for use with a Voting Rights Act challenge. In part, they are designed to show that it is (readily) possible to draw additional districts with a majority of Black and Latino adults in many parts of the state of Georgia, and for each of the three levels of districting plan, even while giving great deference to the Legislative enacted plan by only replacing its districts in modular clusters.<sup>5</sup>

In addition to demographic composition, I have offered alternative districts that showcase *effective electoral opportunity*. This shows that the harms to voters can be remedied by better design and, in the context of racial gerrymandering, demonstrates that better performance on traditional districting principles is completely compatible with greater electoral opportunity for Black and Latino voters.

There are many reasons that we should not rely on the 50%+1 line as a predictor of electoral opportunity. Some have argued that the Gingles/Bartlett 50%+1 requirement requires an element of race-consciousness that is in tension with other aspects of best practices in map-making. Additionally, a demographic share alone does not take into account voting eligibility, registration levels, and turnout. It has long been well understood that a majority-minority district is neither necessary nor sufficient to secure electoral opportunity.

Therefore it is critical to use electoral history to gauge whether a district affords a reasonable opportunity for a group to elect a candidate of its choice. I will describe an effectiveness analysis here and will provide demonstration maps emphasizing increased electoral opportunity for Black and Latino voters, without any racial threshold in play, in §9.

### 5.1 Identifying probative elections

In the voting rights sphere, it is well understood that certain past elections are more probative—that is, provide better and clearer evidence of polarization patterns and preferences—than others. The peer-reviewed literature is certainly clear that some factors flagging probative contests include the following: all other things being equal, elections are more suitable for an effectiveness analysis when they are more recent, when they have a viable POC candidate on the ballot, and when we can make confident statistical inferences about each group's preference. They are less suitable when they are blowouts or, of course, uncontested.

To this end, I have designated the following eight general elections and four Democratic primary elections (Tables 3) to be especially probative for analyzing effective electoral opportunity for Black and Latino voters in Georgia. All are recent statewide elections (held since 2018), most have a Black candidate on the ballot, and most are quite close on a statewide basis.<sup>6</sup>

<sup>5</sup>It is my understanding that the VRA, as clarified in *Bartlett v. Strickland*, requires a demonstration of additional districts that have at least 50%+1 minority population. The usual standard uses VAP, or voting age population, when Black voters are the main minority group in a challenge; sometimes, CVAP, or citizen voting age population, is used when the principal group of plaintiffs has a large share of immigrants, as for Latino or Asian plaintiffs. In this case, the claims are for a coalition of Black and Latino voters, and I have used both VAP and CVAP, as explained in §3.2.

<sup>6</sup>Even Robinson's primary election, which was won with nearly 63% of the statewide vote, shows substantial district-level variation. By contrast, in the Democratic primary for Governor in 2018, Abrams won with 76.4% and with little regional variation, making it a less informative contest, which explains why it is not included.

Year	Contest	R Candidate	D Candidate	D share
2016	President	Trump-Pence	Clinton-Kaine	.4734
2018	Governor	Brian Kemp	Stacey Abrams (B)	.4930
2018	Super. Pub. Instruc.	Richard Woods	Otha Thornton (B)	.4697
2020	President	Trump-Pence	Biden-Harris (B)	.5013
2020	Public Serv. Commiss.	Lauren McDonald	Daniel Blackman (B)	.4848
2021	Senate Runoff	David Perdue	Jon Ossoff	.5061
2021	Senate Runoff Special	Kelly Loeffler	Raphael Warnock (B)	.5104
2022	Governor	Brian Kemp	Stacey Abrams (B)	.4620

Year	Contest	BH-Preferred Candidate	D share (outcome)
2018	Lt. Governor	Triana Arnold James (B)	.4475 (L)
2018	Super. Primary	Otha Thornton (B)	.4387 (1st of 3)
2018	Super. Runoff	Otha Thornton (B)	.5914 (W)
2018	Insurance Commiss.	Janice Laws Robinson (B)	.6286 (W)

Table 3: Eight general elections and four primaries and primary runoffs are chosen for the score of effectiveness.

## 5.2 Constructing and evaluating a score of electoral alignment

Using the four primary and eight general elections listed here, I will deem a district to be *effective* if it is electorally aligned with the preferences of Black and Latino voters in at least three out of four primaries and at least five out of eight general elections. This standard ascertains that minority-preferred candidates can be both nominated and elected from the district, and it distinguishes minority preferences from (related, but distinct) Democratic party preferences. This same core idea of measuring district effectiveness—keyed to electoral history, not to demographics of the district—appears frequently in the peer-reviewed literature, for instance in [1].

The enacted plans starkly limit the number of districts that earn the label of effective. Tables 4-6 show that five out of 14 Congressional districts are likely to give Black and Latino voters an effective opportunity to elect candidates of choice.

Similarly, the enacted plans have 19 expected effective districts out of 56 in the Senate, and 68/180 in the House. (For detailed supporting tables, see Appendix B.)

Since elections were conducted under these new districts in 2022, we can review some basic evidence about the success of the classification of "effective" opportunity districts. I have not conducted a racially polarized voting analysis, but we can nonetheless use information about whether each district elected candidates of color as a rough proxy for the preferences of voters of color. Since White and/or Republican candidates can certainly be preferred by voters of color, this is imperfect, but it is at least an indication that can help us assess the labeling mechanism.<sup>7</sup> Here is what we find for the enacted plans:

- 5/5 Congressional districts marked effective elected POC Democrats (100%);
- 0/9 Congressional districts marked ineffective elected POC Democrats (0%);
- 18/19 Senate districts marked effective elected POC Democrats (94.7%);
- 1/37 Senate districts marked ineffective elected POC Democrats (2.7%);
- 58/68 House districts marked effective elected POC Democrats (85.3%);
- 4/112 House districts marked ineffective elected POC Democrats (3.6%).

<b>CD</b>	<b>Primaries</b> out of 4	<b>Generals</b> out of 8	<b>Effective?</b>
1	3	0	N
2	4	8	Y
3	3	0	N
4	3	8	Y
5	3	8	Y
6	0	0	N
7	3	8	Y
8	3	0	N
9	2	0	N
10	3	0	N
11	3	0	N
12	3	0	N
13	4	8	Y
14	3	0	N

Table 4: By the standard of requiring that the candidate of choice should win at least three out of four primaries and at least five out of eight generals, the enacted plan has five districts that present an effective opportunity: CD 2, 4, 5, 7, and 13.

<b>CD</b>	<b>James18P</b>	<b>Thornton18P</b>	<b>Thornton18R</b>	<b>Robinson18P</b>
overall	0.4475	0.4387	0.5914	0.6286
1	0.4992	0.4997	0.7150	0.6967
2	0.5515	0.4720	0.6379	0.7430
3	0.4177	0.4185	0.5388	0.6178
4	0.4566	0.4444	0.5622	0.6034
5	0.3747	0.4082	0.5611	0.5184
6	0.2815	0.3458	0.4720	0.4789
7	0.4489	0.4515	0.5968	0.6082
8	0.4861	0.4403	0.6273	0.6940
9	0.3411	0.3811	0.5444	0.5560
10	0.4112	0.4294	0.6444	0.5898
11	0.3603	0.4200	0.5276	0.5549
12	0.4928	0.4196	0.6462	0.7626
13	0.5594	0.5089	0.6524	0.7190
14	0.4190	0.3863	0.5049	0.6123

Table 5: Vote shares for the candidate of choice in probative primary and runoff elections. (Note that the Superintendent primary from 2018 (Thornton18P) is a race with three candidates, so a win is recorded if Thornton has the most votes, even if that does not exceed 50% of cast votes.)

<sup>7</sup>Indeed, Nan Orrock of SD 36, the only White Democrat in the Senate to be elected from a district marked effective, is an Associate Member of the Georgia Black Legislative Caucus, suggesting with high likelihood that she is the Black candidate of choice.



<b>CD</b> overall	<b>Clinton16</b>	<b>Abrams18</b>	<b>Thornton18</b>	<b>Biden20</b>	<b>Blackman20</b>	<b>Ossoff21</b>	<b>Warnock21</b>	<b>Abrams22</b>
	0.4734	0.4930	0.4697	0.5013	0.4848	0.5061	0.5104	0.4620
1	0.4149	0.4245	0.4105	0.4322	0.4193	0.4379	0.4386	0.3950
2	0.5463	0.5508	0.5354	0.5524	0.5445	0.5611	0.5624	0.5188
3	0.3168	0.3287	0.3119	0.3476	0.3312	0.3524	0.3564	0.3130
4	0.7692	0.7886	0.7567	0.7917	0.7789	0.7927	0.7982	0.7707
5	0.8352	0.8418	0.7910	0.8366	0.8080	0.8203	0.8287	0.8072
6	0.3603	0.3878	0.3498	0.4250	0.3851	0.4068	0.4151	0.3602
7	0.5727	0.6113	0.5788	0.6307	0.6136	0.6366	0.6421	0.5874
8	0.3430	0.3427	0.3280	0.3604	0.3473	0.3648	0.3664	0.3185
9	0.2650	0.2822	0.2668	0.3081	0.2897	0.3084	0.3129	0.2554
10	0.3510	0.3654	0.3518	0.3814	0.3650	0.3864	0.3903	0.3480
11	0.3708	0.4014	0.3741	0.4223	0.3972	0.4163	0.4233	0.3696
12	0.4324	0.4319	0.4174	0.4487	0.4331	0.4511	0.4526	0.4023
13	0.7790	0.8112	0.7916	0.8048	0.8068	0.8230	0.8261	0.8056
14	0.2767	0.2961	0.2873	0.3105	0.3015	0.3217	0.3234	0.2778

Table 6: Vote shares for the candidate of choice in probative general/runoff elections.

In addition, this method works quite well to distinguish race from party: if we flag districts with 0/4 primary wins and at least 5/8 general wins, these might reasonably be considered likely to elect White-preferred Democrats. There are no such districts in the enacted Congressional map, but the Senate map has three (which elected three White Democrats and one Asian Democrat in November 2022) and the House map has eight (which elected seven White Democrats and one Asian Democrat).

## 6 Metrics for enacted plans

Georgia has 14 Congressional districts, 56 state Senate districts, and 180 state House districts, making the task of redistricting into an extremely complicated balancing act. The list of substantive criteria for assessing districting plans that was published by each chamber of the Legislature reads as follows, in full:

### A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
  - a. The boundaries of counties and precincts;
  - b. Compactness; and
  - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

This is unusually terse for a redistricting framework at the state level, declining to specify more detail, for example, about the operative principles of racial fairness, the definition of communities of interest, or even whether to encourage the use of quantitative metrics of compactness.

All of the plans under consideration are contiguous, and I will systematically discuss the other principles below.

### 6.1 Population balance

All plans are tightly balanced in population terms, using the Census redistricting data.

	Maximum positive deviation	Maximum negative deviation	Top-to-bottom deviation
<b>EnactedCD</b>	+1	−1	2
<b>DuncanKennedy</b>	+2	−1	3
<b>CD Alt</b>	+1	−1	2
<b>EnactedSD</b>	+1879	−1964	3843 (2.01%)
<b>SD Alt Eff 1</b>	+2457	−2598	5055 (2.64%)
<b>SD Alt Eff 2</b>	+2547	−2490	5037 (2.63%)
<b>SD Alt Eff 3</b>	+3200	−3305	6505 (3.40%)
<b>EnactedHD</b>	+797	−833	1630 (2.74%)
<b>HD Alt Eff 1</b>	+1194	−1176	2370 (3.98%)
<b>HD Alt Eff 2</b>	+1222	−1097	2319 (3.90%)
<b>HD Alt Eff 3</b>	+1173	−1026	2199 (3.70%)

Table 7: Population deviation in each plan.

## 6.2 Compactness

In redistricting, the notion of *compactness* is connected to the shapes of the districts, where simple boundaries and regular shapes are traditionally thought to indicate a "natural" division of population, while eccentric boundaries and contorted shapes can signal that some other agenda has predominated.

The two most common compactness metrics are the Polsby-Popper score and the Reock score. These are both *contour-based* scores that rely on the outline of the district on a map. *Polsby-Popper* is a ratio formed by comparing the district's area to its perimeter via the formula  $4\pi A/P^2$ . *Reock* considers how much of the smallest bounding circle is filled out by the district's area. Recently, mathematicians (such as myself) have argued for the use of discrete compactness metrics that de-emphasize the outline and instead consider how the districts are formed from units of census geography. The simplest discrete metric is called (*block*) *cut edges*, found by counting the number of pairs of census blocks that are adjacent to each other in the state, but are assigned to different districts. This assesses the "scissors complexity" of a plan, giving a measure of how many blocks would have to be separated from one another to divide up all the districts.

An advantage of the contour scores is that they are familiar and in wide use. An advantage of discrete scores is that they do not excessively penalize districts for having winding boundaries when those boundaries come from physical geography, like coastlines or rivers.

	<b>avg Polsby-Popper</b> (higher is better)	<b>avg Reock</b> (higher is better)	<b>Block cut edges</b> (lower is better)
<b>BenchmarkCD</b>	0.238	0.452	5775
<b>EnactedCD</b>	0.267	0.441	5075
<b>DuncanKennedy</b>	0.295	0.471	4665
<b>CD Alt</b>	0.287	0.452	4729
<b>BenchmarkSD</b>	0.250	0.421	12,549
<b>EnactedSD</b>	0.287	0.418	11,005
<b>SD Alt Eff 1</b>	0.287	0.427	10,897
<b>SD Alt Eff 2</b>	0.296	0.440	10,349
<b>SD Alt Eff 3</b>	0.295	0.431	10,479
<b>BenchmarkHD</b>	0.244	0.382	24,001
<b>EnactedHD</b>	0.278	0.391	22,014
<b>HD Alt Eff 1</b>	0.275	0.399	21,360
<b>HD Alt Eff 2</b>	0.281	0.406	21,301
<b>HD Alt Eff 3</b>	0.279	0.403	20,917

Table 8: Compactness scores for each plan.

Note that compactness scores should only be used to make relative assessments, comparing plans to others in the same state and at the same level of redistricting.

### 6.3 Respect for political boundaries

The most populous Georgia counties by 2020 population are Fulton County (pop. 1,066,710), Gwinnett County (pop. 957,062), Cobb County (pop. 766,149), and DeKalb County (pop. 764,382). Both Cobb and DeKalb are within 0.1% of ideal Congressional district size of 765,136, with Cobb slightly larger and DeKalb slightly smaller.<sup>8</sup>

Since there are four times as many Senate as Congressional districts, this also means that Cobb (4.005) and DeKalb (3.996) are ideally suited in population terms to make up four Senate districts; in addition, Gwinnett (5.003) is very nearly five times ideal Senate population. Instead, Cobb touches six Senate districts, DeKalb touches seven, and Gwinnett is split among nine in the enacted Senate plan. This observation spotlights the fact that it is important to consider not only how many counties are split, but into how many pieces, as in Table 9. If a unit is split in two, that adds two to the "pieces" count; likewise, if it is split into three parts, this counts as three "pieces," and so on. Unsplit units do not count toward "pieces." (A forensic look at the nature of the county and precinct splits can be found below in §10.2.) In this table, the "muni" units are Census places with functional status A ("Active government providing primary general-purpose functions").<sup>9</sup> These primarily include cities and towns.

	County Splits (out of 159)	County Pieces	Muni Splits (out of 538)	Muni Pieces	Precinct Splits (out of 2685)	Precinct Pieces
<b>BenchmarkCD</b>	16	38	67	141	67	134
<b>EnactedCD</b>	15	36	64	136	86	172
<b>DuncanKennedy</b>	15	36	53	114	66	132
<b>CD Alt</b>	13	30	58	127	47	95
<b>BenchmarkSD</b>	37	100	114	269	154	309
<b>EnactedSD</b>	29	89	109	266	144	289
<b>SD Alt Eff 1</b>	33	95	112	275	110	221
<b>SD Alt Eff 2</b>	26	78	108	264	97	196
<b>SD Alt Eff 3</b>	29	84	108	264	106	213
<b>BenchmarkHD</b>	72	284	169	506	303	630
<b>EnactedHD</b>	69	278	166	494	352	724
<b>HD Alt Eff 1</b>	73	276	164	492	279	570
<b>HD Alt Eff 2</b>	69	266	168	494	276	567
<b>HD Alt Eff 3</b>	69	265	165	478	277	567

Table 9: Number of county, muni, and precinct splits and pieces in each plan.

<sup>8</sup>This means that only three Georgia counties are larger than the ideal population of a Congressional district. Twelve Georgia counties are larger than ideal Senate size, and thirty-nine Georgia counties, from Fulton down to Effingham (pop. 64,769) are larger than ideal House size.

<sup>9</sup><https://www.census.gov/library/reference/code-lists/functional-status-codes.html>

## 6.4 Racial demographics

Though majority-minority districts are not demanded for compliance with the Voting Rights Act, they nonetheless play a significant role in VRA litigation, especially in the Gingles 1 threshold test. For that purpose, plaintiffs must show maps with additional districts that are at least 50%+1 person composed of members of the specified minority group. Typically, when Black residents are the largest minority group, the basis for measurement is BVAP, or voting age population, as tabulated in the Decennial Census data. For a coalition of Black and Latino voters, we additionally use a secondary basis of population, in this case BHCVAP.

Here, I review the plans discussed in this report and enumerate the number of districts that have a majority of voting age population that is Black by VAP, Black and Latino by VAP, or Black and Latino by CVAP. The final column enumerates the number of districts that, according to their recent electoral history in statewide contests, are likely to provide an effective opportunity for Black and Latino voters to nominate and elect candidates of their choosing. Racial and ethnic categories are described in Appendix A, and the concept of measuring district effectiveness is delineated in §5.

	majority BVAP	majority BHVAP	majority BHCVAP	effective
<b>BenchmarkCD</b>	4	4	4	5
<b>EnactedCD</b>	2	5	4	5
<b>Duncan-Kennedy CD Alt</b>	3	5	4	5
	4	6	6	6
<b>BenchmarkSD</b>	14	17	17	19
<b>EnactedSD</b>	14	17	17	19
<b>SD Alt Eff 1</b>	17	23	22	23
<b>SD Alt Eff 2</b>	15	21	21	23
<b>SD Alt Eff 3</b>	8	17	16	28
<b>BenchmarkHD</b>	46	57	57	62
<b>EnactedHD</b>	49	62	60	68
<b>HD Alt Eff 1</b>	50	77	74	77
<b>HD Alt Eff 2</b>	44	75	71	79
<b>HD Alt Eff 3</b>	37	62	54	83

Table 10: The first three columns report the number of majority-BVAP, majority-BHVAP, and majority-BHCVAP districts, in the plans under discussion in this report. Overall, the state is 31.7% Black by VAP, 40.18% Black and Latino by VAP, and 38.43% Black and Latino by CVAP. The final column reports the number of districts labeled as effective in terms of electoral opportunity for Black and Latino voters.

## 6.5 Incumbency and core retention

Next, we review the handling of incumbency and the more general issue of reassigning voters to new districts in the plans under consideration. Note that members of Congress do not have to establish residency in the district that they represent, while Georgia law does have a district residency requirement for members of the state legislature.<sup>10</sup> In this section, I am relying on address data for incumbents that was supplied by counsel and there is certainly a strong possibility that it is not fully up-to-date or accurate.

The enacted Congressional plan double-bunked two pairs of incumbents: Nikema Williams (D) and David Scott (D) in CD 5; Jody Hice (R) and Andrew Clyde (R) in CD 10. However, Hice did not run for Congress in 2022, shifting to an unsuccessful run for Secretary of State, and David Scott already lived in CD 5 in the benchmark plan.

The enacted Senate plan also double-bunked two pairs of incumbents: Tyler Harper (R) and Carden Summers (R) in SD 13; Chuck Hufstetler (R) and Bruce Thompson (R) in SD 52. But Harper ran a successful campaign for Agriculture Commissioner, leaving Summers to win SD 13, while Thompson ran a successful campaign for Labor Commissioner, leaving SD 52 for Hufstetler. This leaves no meaningful pairings in the Senate map.

The shifting of incumbents is also apparent in the state House map. The enacted House plan seemingly double-bunks seventeen pairs of incumbents: nine R/R pairs, six D/D pairs, and two R/D pairs.

However, the apparent HD 10 collision is suspect (likely due to an inaccurate address for Lauren "Bubba" McDonald) because McDonald was reelected in HD 26, which contains no incumbent address from our list. Several seeming collisions are not meaningful because one of the Representatives had already retired or resigned: this includes Micah Gravley (now located in HD 19), Wes Cantrell (HD 21), Tommy Benton (HD 31), Matt Dollar (HD 45), Susan Holmes (HD 118), and Dominic LaRiccina (HD 176). The HD 100 collision is real, and Bonnie Rich lost to David Clark in the Republican primary; the HD 149 collision also ended in a primary showdown.

Among Democratic collisions, we note that Matthew Wilson (placed in HD 52) made an unsuccessful primary run for Insurance Commissioner; William Boddie made an unsuccessful run for Labor Commissioner; and David Dreyer (HD 62) did not run. Mitchell and Hutchinson did face off in a primary in HD 106.

Among the R/D collisions, Mickey Stephens (HD 74) died in office; Timothy Barr (HD 101) ran an unsuccessful primary for CD 10; and Winifred Dukes (HD 154) ran an unsuccessful primary for Agriculture Commissioner.

In all, this means that of 17 apparent collisions of incumbents, only three ended in a contest between incumbents. By far most of the others seem to be explained by retirement, resignation, or a run for another office.<sup>11</sup>

While incumbent pairings were therefore avoided, this is not to say that the new House plan was very favorable to incumbents in other ways. As I will discuss throughout this report, the state's line-drawers clearly placed a low priority on *core retention*, i.e., on maintaining voters in the same districts as they belonged to in the benchmark plan. The enacted plans for Congress and for state Senate each reassign more than two million residents to new districts relative to the prior assignment of their census block. But the House plan is on another level, with 6,135,234 people—roughly three out of every five Georgia residents—voting in a different district than before. This unusually high displacement is certainly permissible under the law, but it reveals that the legislature was willing to accept major changes to the map in pursuit of other goals. Below, in §10.1, I will present a closer look at which districts were particularly targeted for wholesale reconfiguration.

<sup>10</sup>See [law.georgia.gov/opinions/2001-3-0](http://law.georgia.gov/opinions/2001-3-0).

<sup>11</sup>With the caveat that these numbers may not be highly meaningful without considering who planned to run again, and that they may not be wholly accurate, here are the numbers of districts with more than one incumbent address for the alternative plans. Benchmark CD - 1, SD - 0, HD - 5; Duncan-Kennedy - 3; CD Alt - 3; SD Alt Eff 1 - 11; SD Alt Eff 2 - 8; SD Alt Eff 3 - 9; HD Alt Eff 1 - 35; HD Alt Eff 2 - 31; HD Alt Eff 3 - 31.

## 7 Gingles demonstration plans

### 7.1 Congressional alternatives

The state's enacted Congressional plan has two majority-BVAP districts (CD 4 and CD 13). Moving to the Black and Latino coalition, three more districts (CD 2, CD 5, and CD 7, by a hair) join these in being majority-BHVAP. However, if we switch the basis of population to CVAP rather than VAP, the number of coalition districts in the state's enacted plan drops to 4, losing CD 7.

Here, I have provided an alternative plan with 4/6/6 majority districts (by BVAP, BHVAP, and BHCVAP, respectively). That is, the six coalition-majority districts (CD 2, 3, 4, 5, 7, and 13) are still BH-majority on the basis of CVAP, making this a gain of two districts over the state. The newcomer to the list is CD 3, which runs along Georgia's western border, connecting the metro Atlanta area to Sanford Bishop's district in the southwest. By the notion of electoral effectiveness outlined in §5 below, all six of these districts offer an effective opportunity for Black and Latino voters to elect candidates of choice (Table 50).

CD	CD Enacted (Statewide)						CD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
1	28.2%	6.8%	35.0%	60.4%	0.285	0.456	30.3%	6.9%	37.2%	58.5%	0.312	0.633
2	49.3%	5.1%	54.4%	42.7%	0.267	0.458	47.7%	4.7%	52.4%	44.5%	0.315	0.494
3	23.3%	5.3%	28.6%	66.8%	0.275	0.461	51.2%	7.2%	58.4%	37.4%	0.278	0.411
4	54.5%	10.1%	64.6%	28.3%	0.246	0.307	50.6%	8.2%	58.8%	33.8%	0.295	0.481
5	49.6%	6.7%	56.3%	37.9%	0.322	0.512	50.1%	11.4%	61.5%	33.4%	0.216	0.424
6	9.9%	9.1%	19.0%	66.6%	0.198	0.424	13.7%	10.9%	24.6%	57.1%	0.232	0.346
7	29.8%	21.3%	51.1%	32.8%	0.386	0.496	34.3%	22.4%	56.7%	29.4%	0.351	0.518
8	30.0%	6.1%	36.1%	60.5%	0.210	0.338	27.3%	6.9%	34.2%	63.0%	0.227	0.377
9	10.4%	12.9%	23.3%	68.3%	0.253	0.380	4.6%	11.5%	16.1%	77.9%	0.403	0.512
10	22.6%	6.5%	29.1%	66.2%	0.284	0.558	17.6%	6.9%	24.5%	69.8%	0.335	0.576
11	17.9%	11.2%	29.1%	64.0%	0.207	0.480	17.6%	7.6%	25.2%	68.1%	0.283	0.364
12	36.7%	4.9%	41.6%	54.6%	0.278	0.502	39.2%	4.6%	43.8%	51.9%	0.181	0.489
13	66.7%	10.5%	77.2%	18.8%	0.157	0.380	52.0%	6.8%	58.8%	37.8%	0.276	0.510
14	14.3%	10.6%	24.9%	71.3%	0.373	0.426	7.6%	11.0%	18.6%	77.0%	0.514	0.484
Avg					0.267	0.441					0.301	0.473

Table 11: VAP statistics and compactness comparison by district for the enacted Congressional plan and an alternative plan. The alternative plan has more majority-minority districts; it is also more compact by all three scores of compactness, including both contour-based scores in the table as well as 4665 rather than 5075 cut edges. The alternative also splits only 13 counties while the enacted plan splits 15. CVAP comparison is shown below in Table 24.

### 7.2 State Senate alternatives

Overall, the enacted state Senate plan creates majority BVAP/BHVAP/BHCVAP majority districts in the numbers 14/17/17 out of 56. By mixing and matching the options I have provided, my modular alternatives can replace that with a new Senate plan with and additional 1-6 majority districts.

The increase is accomplished while maintaining other traditional principles—like compactness and splitting scores—that are generally comparable to or better than those of the state's enacted plan.

Below, I will review the Gingles demonstration alternatives one cluster at a time, showing the enacted plan and alternatives (which sometimes include both an Alt 1 and an Alt 2) for each cluster. The purpose of showing multiple alternatives is to illustrate the kinds of tradeoffs present in all redistricting problems, and to give a sense of the enormous range of possible directions for satisfying the Gingles 1 threshold test.



**7.2.1 SD Atlanta**

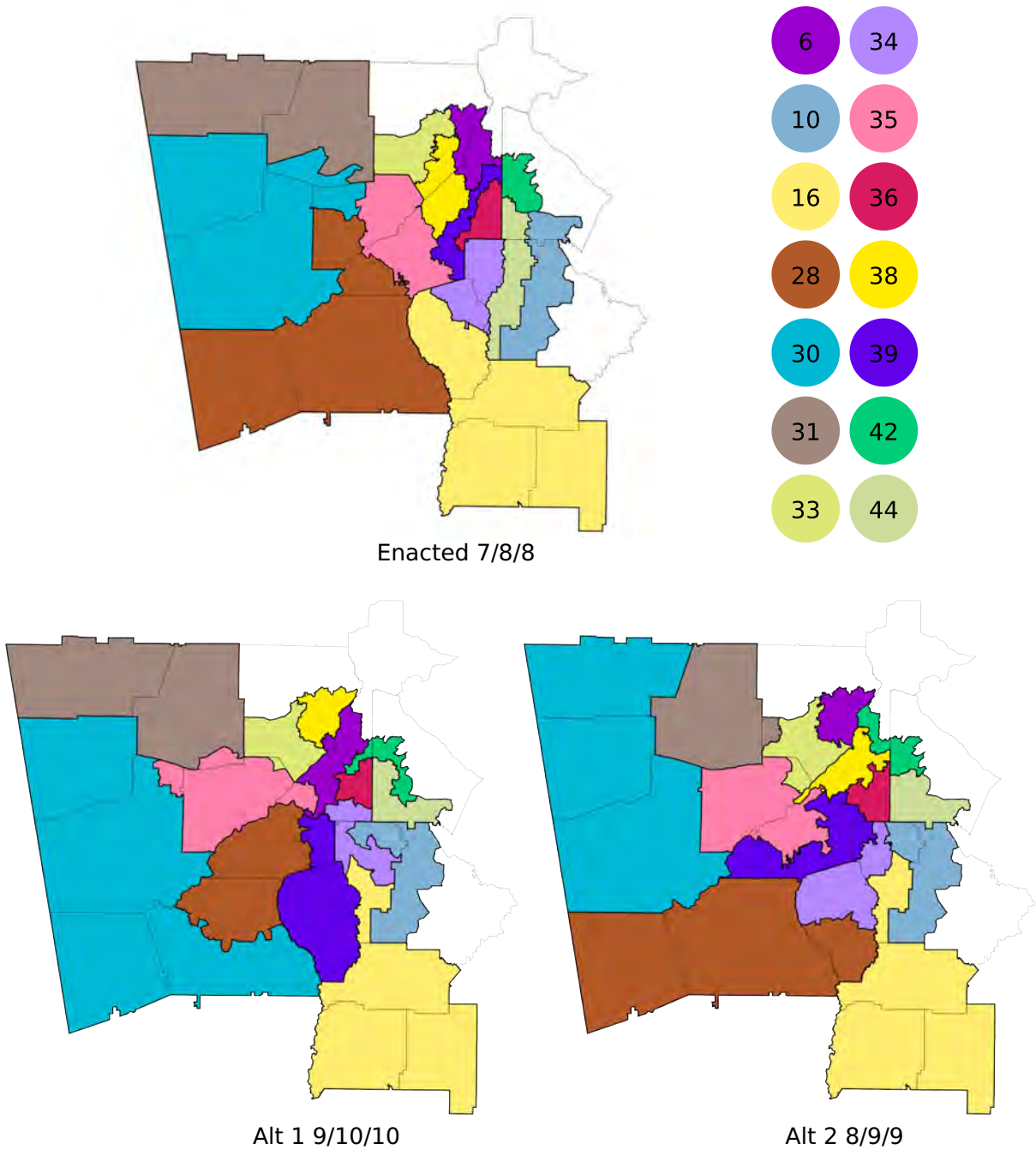


Figure 8: SD Atlanta (14 districts).



SD	SD Atlanta Enacted						SD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
6	23.9%	8.2%	32.1%	57.8%	0.236	0.405	50.1%	6.1%	56.2%	39.8%	0.169	0.246
10	71.5%	5.2%	76.7%	19.6%	0.231	0.281	59.5%	11.0%	70.5%	23.4%	0.238	0.420
16	22.7%	5.0%	27.7%	66.9%	0.314	0.368	50.2%	6.2%	56.4%	40.9%	0.254	0.354
28	19.5%	6.4%	25.9%	69.4%	0.246	0.445	50.6%	6.8%	57.4%	39.3%	0.335	0.489
30	20.9%	6.1%	27.0%	69.4%	0.407	0.597	14.3%	5.1%	19.4%	76.9%	0.286	0.361
31	20.7%	7.4%	28.1%	68.3%	0.379	0.366	19.7%	7.2%	26.9%	69.4%	0.470	0.395
33	43.0%	22.9%	65.9%	30.2%	0.215	0.401	50.4%	18.1%	68.5%	27.9%	0.381	0.528
34	69.5%	12.7%	82.2%	13.4%	0.335	0.451	72.2%	11.6%	83.8%	11.5%	0.163	0.326
35	71.9%	7.5%	79.4%	18.8%	0.263	0.472	50.9%	8.0%	58.9%	38.2%	0.347	0.400
36	51.3%	7.1%	58.4%	36.2%	0.305	0.321	50.0%	5.7%	55.7%	38.8%	0.339	0.452
38	65.3%	8.4%	73.7%	21.9%	0.208	0.361	27.9%	15.4%	43.3%	46.1%	0.271	0.487
39	60.7%	5.6%	66.3%	27.9%	0.128	0.166	51.2%	5.4%	56.6%	38.6%	0.277	0.357
42	30.8%	8.6%	39.4%	51.4%	0.321	0.479	35.8%	9.6%	45.4%	43.5%	0.112	0.289
44	71.3%	8.6%	79.9%	15.3%	0.185	0.180	61.6%	3.6%	65.2%	31.0%	0.237	0.356
Avg					0.270	0.378					0.277	0.390

Table 12: SD Atlanta Alt 1 splits 8 counties within the cluster compared to 7 in the enacted plan and has a better discrete compactness score, with 2017 cut edges rather than 2197, to go with comparable Polsby-Popper and superior Reock compactness.

SD	SD Atlanta Enacted						SD Alt 2					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
6	23.9%	8.2%	32.1%	57.8%	0.236	0.405	28.0%	14.9%	42.9%	46.7%	0.256	0.477
10	71.5%	5.2%	76.7%	19.6%	0.231	0.281	59.7%	9.8%	69.5%	23.3%	0.307	0.416
16	22.7%	5.0%	27.7%	66.9%	0.314	0.368	48.4%	6.1%	54.5%	42.4%	0.258	0.366
28	19.5%	6.4%	25.9%	69.4%	0.246	0.445	15.8%	6.1%	21.9%	72.8%	0.347	0.371
30	20.9%	6.1%	27.0%	69.4%	0.407	0.597	15.7%	6.6%	22.3%	74.2%	0.473	0.508
31	20.7%	7.4%	28.1%	68.3%	0.379	0.366	25.9%	6.7%	32.6%	63.6%	0.591	0.636
33	43.0%	22.9%	65.9%	30.2%	0.215	0.401	50.6%	18.2%	68.8%	27.4%	0.224	0.463
34	69.5%	12.7%	82.2%	13.4%	0.335	0.451	54.4%	11.9%	66.3%	27.9%	0.246	0.381
35	71.9%	7.5%	79.4%	18.8%	0.263	0.472	60.9%	7.5%	68.4%	29.3%	0.206	0.490
36	51.3%	7.1%	58.4%	36.2%	0.305	0.321	54.0%	6.8%	60.8%	33.6%	0.263	0.466
38	65.3%	8.4%	73.7%	21.9%	0.208	0.361	51.0%	5.6%	56.6%	37.6%	0.154	0.260
39	60.7%	5.6%	66.3%	27.9%	0.128	0.166	86.5%	5.5%	92.0%	7.0%	0.118	0.271
42	30.8%	8.6%	39.4%	51.4%	0.321	0.479	17.0%	10.7%	27.7%	61.4%	0.144	0.282
44	71.3%	8.6%	79.9%	15.3%	0.185	0.180	76.3%	3.2%	79.5%	18.7%	0.374	0.456
Avg					0.270	0.378					0.283	0.417

Table 13: SD Atlanta Alt 2 splits 6 counties within the cluster and has just 1985 cut edges, better than the enacted plan's 7 and 2197, while also improving on both contour-based compactness scores.

7.2.2 SD Gwinnett

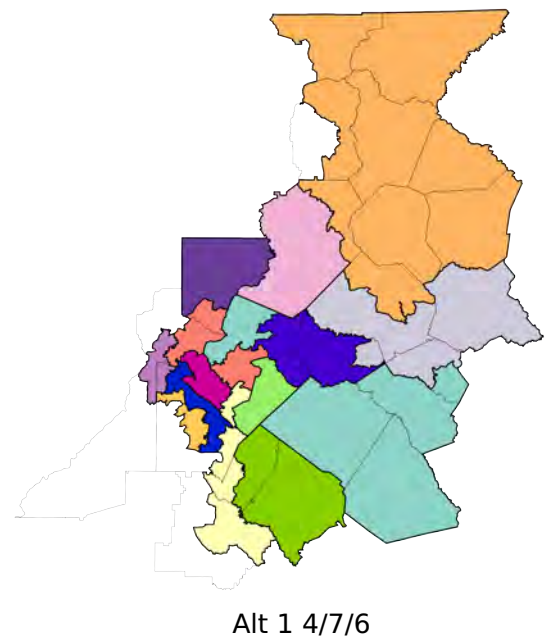
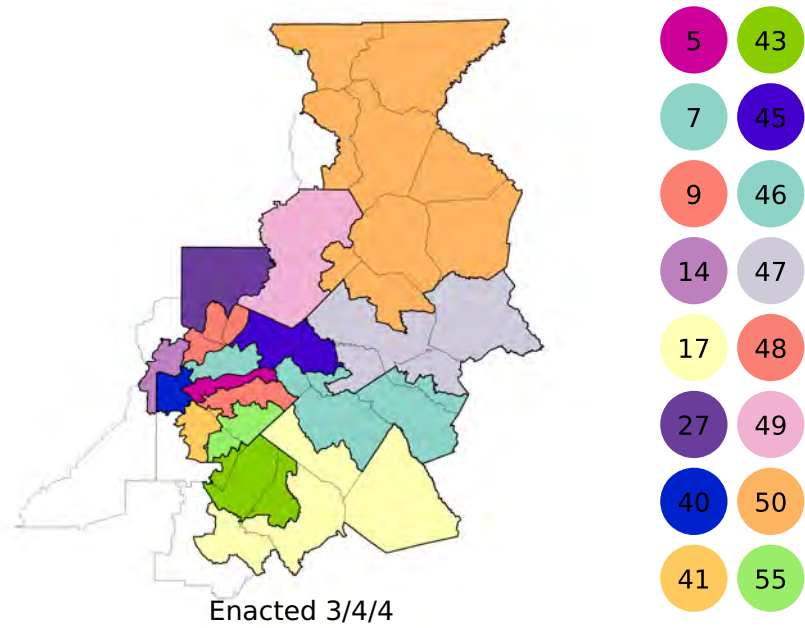


Figure 9: SD Gwinnett (16 districts).

SD	SD Gwinnett Enacted						SD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
5	29.9%	41.7%	71.6%	15.7%	0.207	0.166	20.3%	34.6%	54.9%	28.0%	0.285	0.384
7	21.4%	16.6%	38.0%	37.8%	0.339	0.344	17.1%	14.3%	31.4%	45.5%	0.278	0.401
9	29.5%	18.8%	48.3%	35.8%	0.213	0.233	29.3%	27.0%	56.3%	26.2%	0.234	0.498
14	19.0%	12.1%	31.1%	57.1%	0.242	0.273	18.1%	11.4%	29.5%	57.6%	0.208	0.296
17	32.0%	5.1%	37.1%	59.4%	0.168	0.342	51.1%	6.6%	57.7%	35.9%	0.113	0.188
27	5.0%	10.2%	15.2%	71.5%	0.456	0.499	4.7%	10.2%	14.9%	70.8%	0.500	0.497
40	19.2%	21.6%	40.8%	46.3%	0.345	0.508	50.1%	17.7%	67.8%	25.1%	0.130	0.208
41	62.6%	6.7%	69.3%	21.4%	0.302	0.509	57.3%	10.0%	67.3%	23.3%	0.149	0.279
43	64.3%	6.9%	71.2%	26.5%	0.346	0.635	52.0%	7.0%	59.0%	38.3%	0.420	0.537
45	18.6%	13.1%	31.7%	55.5%	0.305	0.350	19.8%	12.1%	31.9%	58.8%	0.226	0.380
46	16.9%	7.0%	23.9%	69.9%	0.207	0.365	16.5%	5.0%	21.5%	73.4%	0.416	0.514
47	17.4%	9.6%	27.0%	67.5%	0.187	0.353	16.7%	8.7%	25.4%	68.5%	0.176	0.326
48	9.5%	7.0%	16.5%	52.2%	0.342	0.348	10.1%	6.4%	16.5%	54.8%	0.266	0.387
49	8.0%	21.9%	29.9%	65.6%	0.341	0.461	8.1%	24.6%	32.7%	62.8%	0.382	0.573
50	5.6%	8.8%	14.4%	81.5%	0.228	0.450	5.4%	6.1%	11.5%	84.3%	0.232	0.462
55	66.0%	8.7%	74.7%	20.6%	0.271	0.333	50.0%	13.9%	63.9%	30.0%	0.419	0.451
Avg					0.281	0.386					0.277	0.399

Table 14: SD Gwinnett Alt 1 has 9 splits and 2024 cut edges, both better than the enacted plan (10 and 2232). The Polsby-Popper scores are comparable while the alternative plan has a better Reock score.

7.2.3 SD East Black Belt

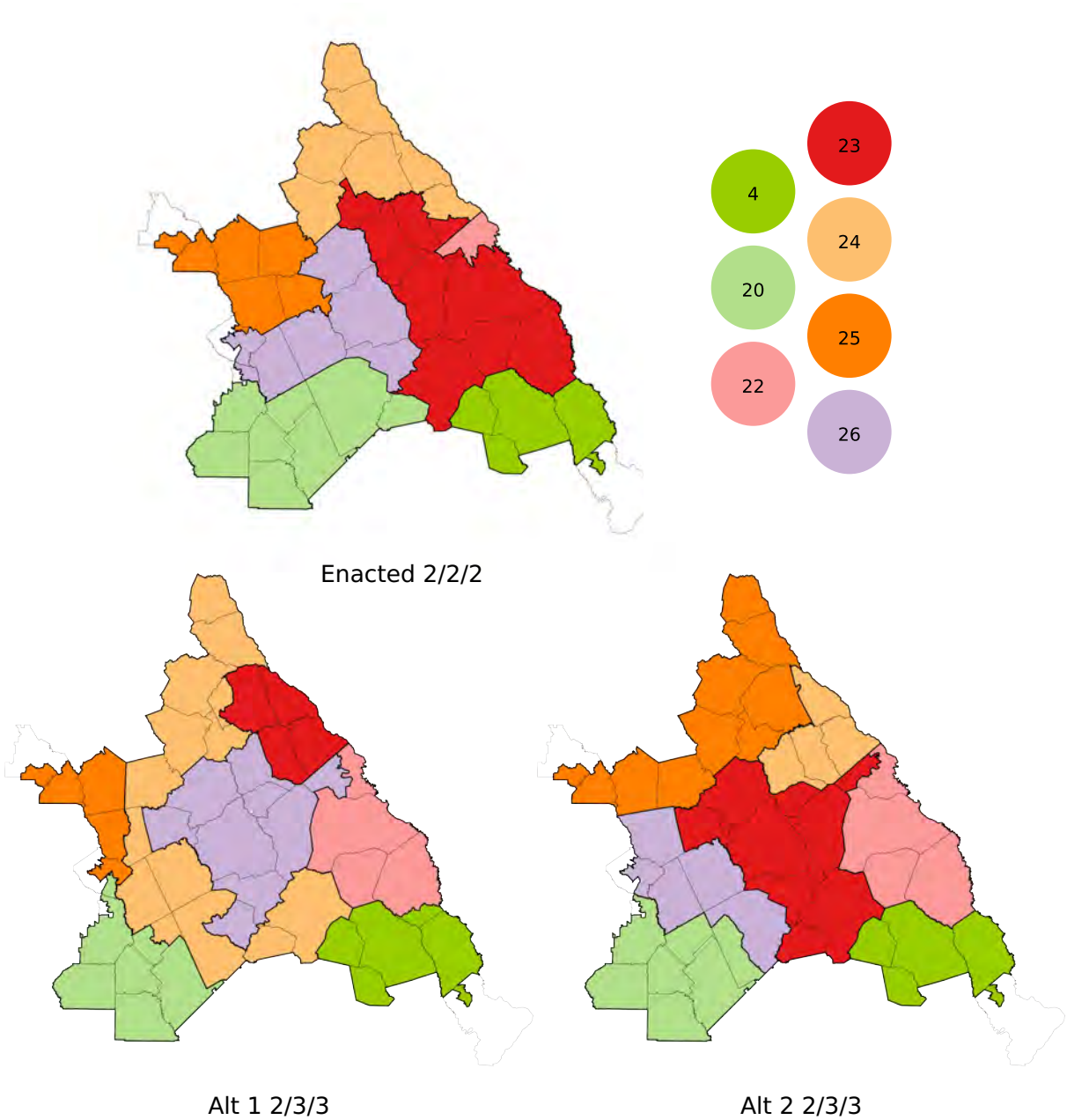


Figure 10: SD East Black Belt (7 districts).

SD	SD East Black Belt Enacted						SD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
4	23.4%	5.5%	28.9%	66.8%	0.265	0.471	23.5%	5.5%	29.0%	66.7%	0.284	0.495
20	31.3%	3.5%	34.8%	61.7%	0.358	0.404	34.4%	5.1%	39.5%	56.5%	0.231	0.498
22	56.5%	5.3%	61.8%	34.4%	0.288	0.404	50.5%	3.8%	54.3%	42.6%	0.241	0.455
23	35.5%	4.5%	40.0%	56.9%	0.164	0.365	23.0%	5.6%	28.6%	64.6%	0.466	0.497
24	19.9%	4.4%	24.3%	69.8%	0.213	0.366	25.0%	3.5%	28.5%	69.1%	0.083	0.229
25	33.5%	3.7%	37.2%	59.9%	0.241	0.386	50.0%	4.0%	54.0%	43.4%	0.174	0.344
26	57.0%	4.2%	61.2%	36.6%	0.203	0.469	50.1%	3.7%	53.8%	43.4%	0.209	0.472
Avg					0.247	0.409					0.241	0.427

Table 15: SD East Black Belt Alt 1 has more cut edges than the state (1301 vs. 1021 from the enacted plan), paired with a comparable Polsby-Popper and a superior Reock score. This alternative plan splits seven counties while the state splits four within the cluster.

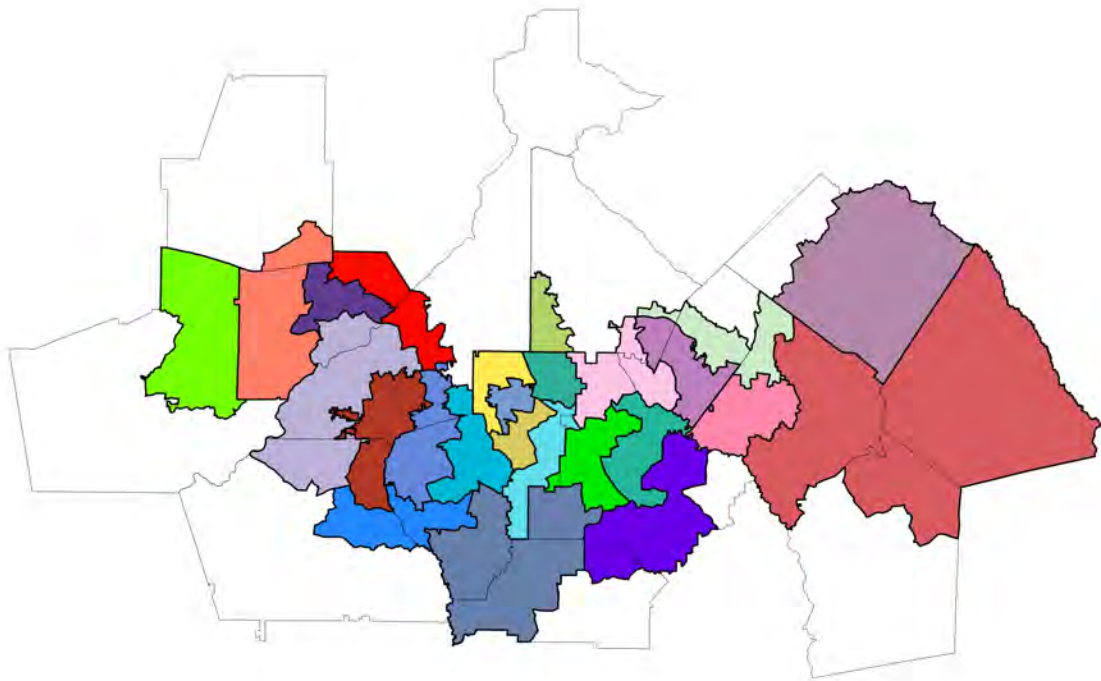
SD	SD East Black Belt Enacted						SD Alt 2					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
4	23.4%	5.5%	28.9%	66.8%	0.265	0.471	23.4%	5.5%	28.9%	66.8%	0.265	0.471
20	31.3%	3.5%	34.8%	61.7%	0.358	0.404	32.5%	4.9%	37.4%	58.7%	0.304	0.586
22	56.5%	5.3%	61.8%	34.4%	0.288	0.404	50.4%	3.5%	53.9%	42.9%	0.264	0.432
23	35.5%	4.5%	40.0%	56.9%	0.164	0.365	47.4%	4.1%	51.5%	45.8%	0.231	0.441
24	19.9%	4.4%	24.3%	69.8%	0.213	0.366	23.1%	5.6%	28.7%	64.5%	0.327	0.458
25	33.5%	3.7%	37.2%	59.9%	0.241	0.386	28.2%	4.5%	32.7%	64.3%	0.176	0.311
26	57.0%	4.2%	61.2%	36.6%	0.203	0.469	51.2%	3.1%	54.3%	43.5%	0.205	0.331
Avg					0.247	0.409					0.253	0.433

Table 16: SD East Black Belt Alt 2 has just two county splits, compared to four in the state's plan. With just 1008 cut edges, it also executes a clean sweep of compactness scores relative to the enacted plan.

### 7.3 State House alternatives

In the state House, the enacted plan creates majority districts for BVAP/BHVAP/BHCVAP in the numbers 49/62/60 out of 180. Taken together, my modular alternatives can combine to replace that with a new House plan with up to 77 majority-BHVAP districts and up to 74 majority-BHCVAP districts.

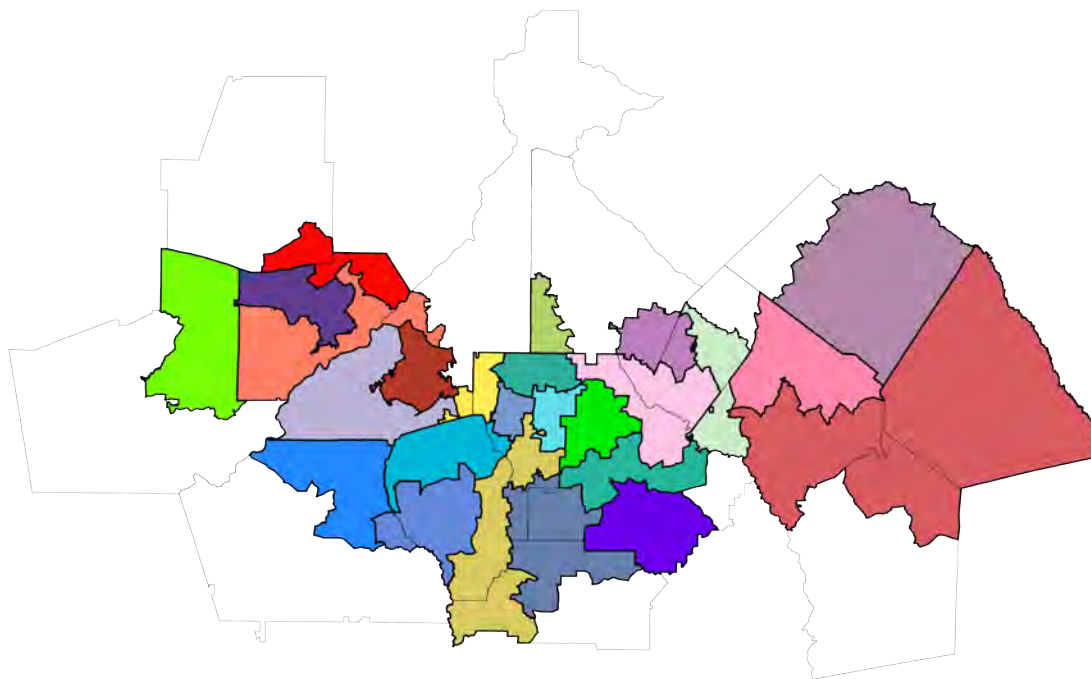
#### 7.3.1 HD Atlanta



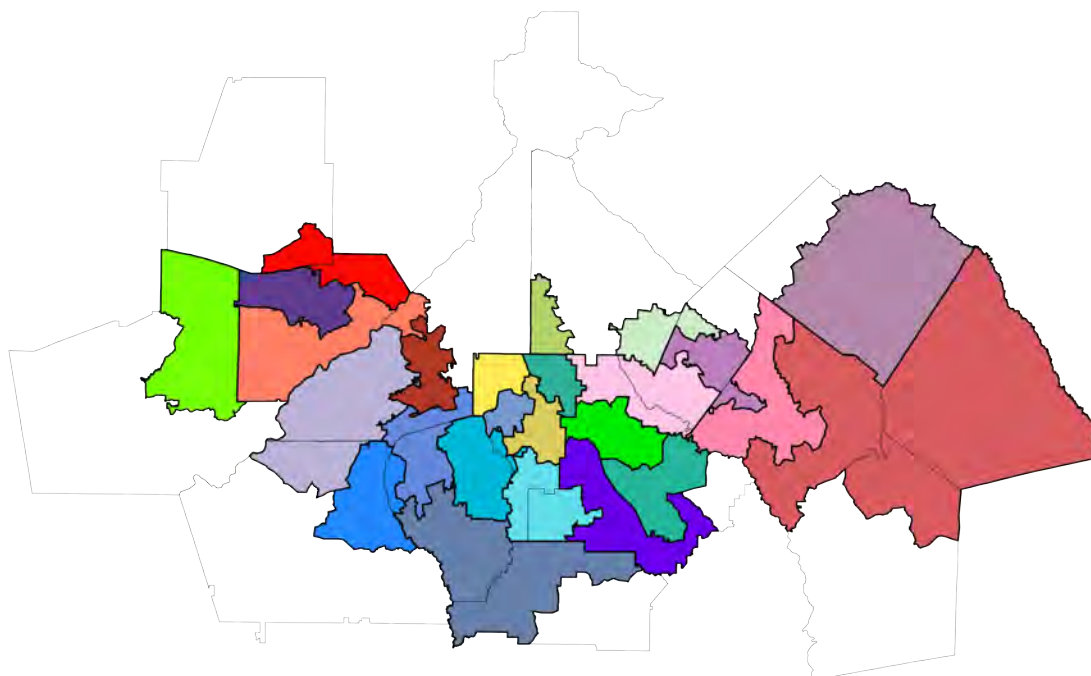
Enacted 18/18/18



Figure 11: HD Atlanta (25 districts).



Alt 1 20/20/20



Alt 2 19/20/20

Figure 12: HD Atlanta (25 districts).



HD	HD Atlanta Enacted						HD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
61	74.3%	7.6%	81.9%	16.8%	0.198	0.247	50.1%	10.0%	60.1%	37.1%	0.229	0.265
64	30.7%	7.4%	38.1%	57.8%	0.361	0.365	50.9%	6.5%	57.4%	40.0%	0.132	0.263
65	62.0%	4.5%	66.5%	31.5%	0.172	0.454	81.7%	4.7%	86.4%	12.5%	0.222	0.350
66	53.4%	9.5%	62.9%	33.9%	0.246	0.356	51.0%	9.0%	60.0%	36.2%	0.256	0.386
67	58.9%	7.8%	66.7%	30.9%	0.122	0.357	89.9%	5.4%	95.3%	4.4%	0.195	0.515
68	55.7%	6.3%	62.0%	33.9%	0.172	0.318	13.7%	6.6%	20.3%	71.5%	0.310	0.518
69	63.6%	5.4%	69.0%	26.9%	0.247	0.403	51.9%	8.8%	60.7%	34.0%	0.339	0.409
71	19.9%	6.2%	26.1%	69.8%	0.352	0.441	19.9%	6.2%	26.1%	69.8%	0.350	0.441
73	12.1%	7.0%	19.1%	72.6%	0.198	0.278	11.8%	6.4%	18.2%	75.9%	0.335	0.417
74	25.5%	5.6%	31.1%	64.4%	0.247	0.496	50.8%	6.9%	57.7%	39.7%	0.205	0.461
75	74.4%	11.3%	85.7%	11.3%	0.285	0.420	54.2%	7.7%	61.9%	34.1%	0.133	0.230
76	67.2%	13.2%	80.4%	10.5%	0.509	0.524	61.6%	20.0%	81.6%	11.2%	0.460	0.409
77	76.1%	12.2%	88.3%	7.6%	0.211	0.396	89.6%	5.0%	94.6%	3.5%	0.211	0.292
78	71.6%	8.9%	80.5%	15.0%	0.194	0.210	64.2%	11.3%	75.5%	15.4%	0.256	0.414
79	71.6%	16.0%	87.6%	7.1%	0.209	0.498	73.3%	14.6%	87.9%	8.0%	0.370	0.444
90	58.5%	4.3%	62.8%	34.0%	0.286	0.359	58.5%	4.3%	62.8%	34.0%	0.286	0.359
91	70.0%	5.9%	75.9%	22.0%	0.202	0.447	50.3%	5.2%	55.5%	40.7%	0.245	0.384
92	68.8%	4.7%	73.5%	24.1%	0.198	0.361	87.6%	3.5%	91.1%	8.3%	0.260	0.543
93	65.4%	9.6%	75.0%	22.9%	0.112	0.260	62.1%	10.4%	72.5%	25.4%	0.160	0.232
112	19.2%	3.3%	22.5%	73.7%	0.522	0.619	19.2%	3.3%	22.5%	73.7%	0.522	0.619
113	59.5%	6.7%	66.2%	31.8%	0.318	0.501	51.0%	5.1%	56.1%	41.2%	0.338	0.425
114	24.7%	3.7%	28.4%	68.8%	0.283	0.502	32.8%	4.4%	37.2%	60.3%	0.267	0.438
115	52.1%	7.0%	59.1%	36.9%	0.226	0.436	50.2%	6.0%	56.2%	38.6%	0.193	0.282
116	58.1%	7.3%	65.4%	27.2%	0.280	0.407	54.8%	8.0%	62.8%	29.6%	0.333	0.478
117	36.6%	5.4%	42.0%	54.5%	0.275	0.408	51.0%	7.2%	58.2%	39.0%	0.409	0.511
Avg					0.257	0.402					0.281	0.403

Table 17: In HD Atlanta, the enacted plan has 10 county splits and 2221 cut edges. Alt 1 maintains 10 county splits and improves to 1988 cut edges.

HD	HD Atlanta Enacted						HD Alt 2					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
61	74.3%	7.6%	81.9%	16.8%	0.198	0.247	47.4%	10.1%	57.5%	39.6%	0.290	0.276
64	30.7%	7.4%	38.1%	57.8%	0.361	0.365	50.5%	6.8%	57.3%	40.0%	0.201	0.271
65	62.0%	4.5%	66.5%	31.5%	0.172	0.454	67.6%	4.1%	71.7%	26.6%	0.302	0.458
66	53.4%	9.5%	62.9%	33.9%	0.246	0.356	51.2%	9.1%	60.3%	36.0%	0.336	0.407
67	58.9%	7.8%	66.7%	30.9%	0.122	0.357	90.4%	5.3%	95.7%	4.0%	0.131	0.428
68	55.7%	6.3%	62.0%	33.9%	0.172	0.318	58.2%	6.8%	65.0%	31.0%	0.168	0.329
69	63.6%	5.4%	69.0%	26.9%	0.247	0.403	54.6%	6.3%	60.9%	34.4%	0.310	0.538
71	19.9%	6.2%	26.1%	69.8%	0.352	0.441	19.9%	6.2%	26.1%	69.8%	0.352	0.441
73	12.1%	7.0%	19.1%	72.6%	0.198	0.278	11.9%	7.0%	18.9%	73.6%	0.373	0.498
74	25.5%	5.6%	31.1%	64.4%	0.247	0.496	12.8%	5.7%	18.5%	75.5%	0.192	0.320
75	74.4%	11.3%	85.7%	11.3%	0.285	0.420	61.4%	12.0%	73.4%	17.6%	0.225	0.404
76	67.2%	13.2%	80.4%	10.5%	0.509	0.524	70.4%	13.2%	83.6%	9.6%	0.352	0.416
77	76.1%	12.2%	88.3%	7.6%	0.211	0.396	77.0%	12.6%	89.6%	7.0%	0.491	0.510
78	71.6%	8.9%	80.5%	15.0%	0.194	0.210	68.6%	8.4%	77.0%	21.0%	0.325	0.540
79	71.6%	16.0%	87.6%	7.1%	0.209	0.498	73.1%	15.5%	88.6%	7.5%	0.357	0.549
90	58.5%	4.3%	62.8%	34.0%	0.286	0.359	58.5%	4.3%	62.8%	34.0%	0.286	0.359
91	70.0%	5.9%	75.9%	22.0%	0.202	0.447	53.0%	5.2%	58.2%	38.4%	0.231	0.369
92	68.8%	4.7%	73.5%	24.1%	0.198	0.361	69.6%	6.9%	76.5%	21.3%	0.174	0.330
93	65.4%	9.6%	75.0%	22.9%	0.112	0.260	85.5%	7.2%	92.7%	7.0%	0.201	0.329
112	19.2%	3.3%	22.5%	73.7%	0.522	0.619	19.2%	3.3%	22.5%	73.7%	0.522	0.619
113	59.5%	6.7%	66.2%	31.8%	0.318	0.501	53.9%	5.6%	59.5%	37.9%	0.153	0.355
114	24.7%	3.7%	28.4%	68.8%	0.283	0.502	24.9%	3.8%	28.7%	68.6%	0.235	0.487
115	52.1%	7.0%	59.1%	36.9%	0.226	0.436	50.3%	6.9%	57.2%	39.8%	0.304	0.475
116	58.1%	7.3%	65.4%	27.2%	0.280	0.407	53.2%	7.9%	61.1%	31.0%	0.382	0.452
117	36.6%	5.4%	42.0%	54.5%	0.275	0.408	50.1%	6.5%	56.6%	38.4%	0.155	0.323
Avg					0.257	0.402					0.282	0.419

Table 18: With 9 county splits and 1995 cut edges, Alt 2 dominates the enacted plan.



**7.3.2 HD Southwest**

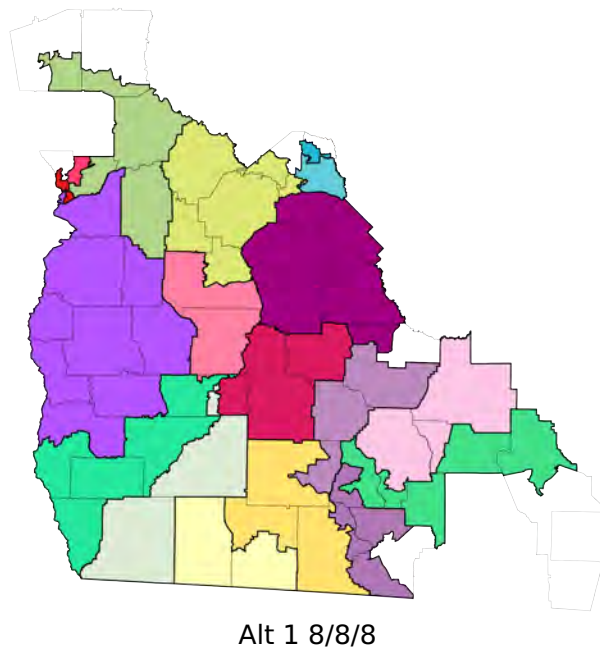
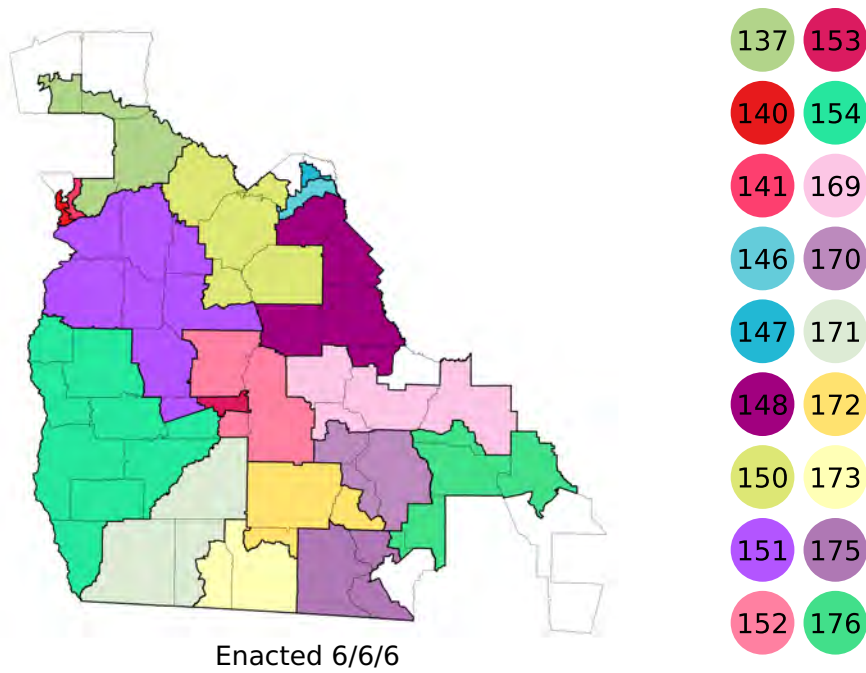


Figure 13: HD Southwest (18 districts).

HD	HD Southwest Enacted						HD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
137	52.1%	4.5%	56.6%	40.8%	0.165	0.328	51.7%	3.7%	55.4%	42.0%	0.143	0.259
140	57.6%	8.0%	65.6%	31.7%	0.192	0.289	57.1%	7.9%	65.0%	32.4%	0.197	0.257
141	57.5%	6.6%	64.1%	31.8%	0.200	0.261	53.6%	6.7%	60.3%	35.5%	0.299	0.423
146	27.6%	4.7%	32.3%	61.8%	0.195	0.257	23.3%	4.9%	28.2%	64.4%	0.208	0.468
147	30.1%	7.2%	37.3%	55.3%	0.261	0.331	31.8%	7.2%	39.0%	55.1%	0.220	0.341
148	34.0%	3.1%	37.1%	60.4%	0.235	0.438	38.6%	3.4%	42.0%	56.1%	0.388	0.590
150	53.6%	6.1%	59.7%	38.3%	0.275	0.439	51.2%	5.3%	56.5%	41.5%	0.250	0.544
151	42.4%	7.3%	49.7%	47.2%	0.222	0.528	51.0%	7.5%	58.5%	38.6%	0.275	0.424
152	26.1%	2.3%	28.4%	67.9%	0.297	0.394	34.2%	3.2%	37.4%	58.7%	0.314	0.473
153	67.9%	2.5%	70.4%	27.7%	0.297	0.298	52.9%	2.7%	55.6%	43.0%	0.400	0.536
154	54.8%	1.7%	56.5%	42.2%	0.332	0.410	50.1%	2.1%	52.2%	45.7%	0.175	0.261
169	29.0%	7.7%	36.7%	61.0%	0.226	0.283	24.0%	9.0%	33.0%	64.6%	0.296	0.456
170	24.2%	8.7%	32.9%	64.2%	0.342	0.531	26.8%	12.5%	39.3%	57.9%	0.223	0.285
171	39.6%	4.6%	44.2%	53.9%	0.368	0.347	51.0%	4.0%	55.0%	43.4%	0.249	0.275
172	23.3%	13.4%	36.7%	61.0%	0.316	0.437	25.1%	9.4%	34.5%	63.1%	0.217	0.375
173	36.3%	5.4%	41.7%	55.7%	0.378	0.564	35.4%	5.6%	41.0%	56.4%	0.412	0.424
175	24.2%	5.0%	29.2%	66.5%	0.374	0.472	21.0%	5.7%	26.7%	68.7%	0.143	0.273
176	22.7%	8.2%	30.9%	66.2%	0.160	0.335	23.8%	6.2%	30.0%	67.1%	0.116	0.227
Avg					0.269	0.386					0.252	0.383

Table 19: HD Southwest Alt 1 splits 12 counties within the cluster, to the state's 10 split counties. Its 2290 cut edges are more than the state's 2094, though the Reock scores are nearly identical.

**7.3.3 HD East Black Belt**

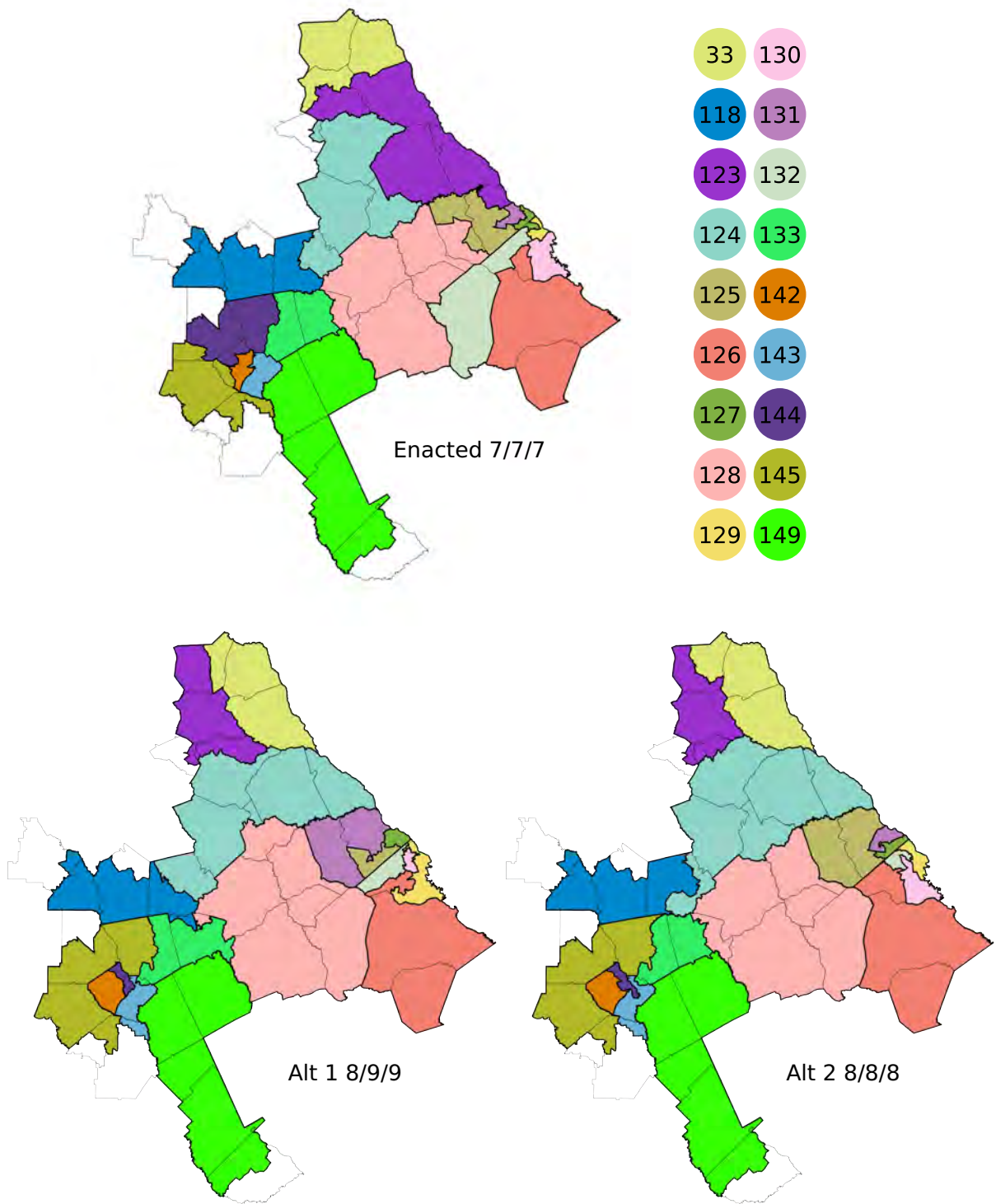


Figure 14: HD East Black Belt (18 districts).

HD	HD East Black Belt Enacted						HD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
33	11.2%	3.1%	14.3%	82.3%	0.371	0.487	18.7%	3.8%	22.5%	74.6%	0.405	0.343
118	23.6%	3.7%	27.3%	69.7%	0.223	0.350	23.2%	3.1%	26.3%	70.6%	0.218	0.329
123	24.3%	4.3%	28.6%	68.1%	0.178	0.295	13.3%	5.8%	19.1%	76.3%	0.281	0.357
124	25.6%	6.2%	31.8%	65.0%	0.233	0.442	28.4%	4.7%	33.1%	64.4%	0.224	0.362
125	23.7%	7.7%	31.4%	63.0%	0.173	0.409	24.1%	8.0%	32.1%	61.5%	0.255	0.328
126	54.5%	3.2%	57.7%	40.0%	0.414	0.516	52.5%	3.5%	56.0%	41.6%	0.322	0.534
127	18.5%	4.8%	23.3%	68.1%	0.201	0.351	14.6%	4.9%	19.5%	70.1%	0.585	0.546
128	50.4%	1.7%	52.1%	46.5%	0.319	0.601	50.1%	1.6%	51.7%	46.7%	0.357	0.628
129	54.9%	4.3%	59.2%	37.2%	0.254	0.482	51.9%	3.5%	55.4%	40.7%	0.108	0.314
130	59.9%	3.9%	63.8%	33.7%	0.255	0.508	54.4%	4.3%	58.7%	38.7%	0.253	0.451
131	17.6%	5.9%	23.5%	68.2%	0.283	0.377	27.1%	5.1%	32.2%	63.3%	0.285	0.604
132	52.3%	7.8%	60.1%	35.6%	0.296	0.270	53.6%	8.2%	61.8%	33.1%	0.293	0.243
133	36.8%	2.1%	38.9%	58.4%	0.415	0.543	48.7%	2.0%	50.7%	47.2%	0.178	0.385
142	59.5%	3.7%	63.2%	34.8%	0.229	0.353	50.8%	3.7%	54.5%	42.3%	0.539	0.605
143	60.8%	4.7%	65.5%	32.3%	0.299	0.502	52.4%	6.3%	58.7%	38.4%	0.176	0.332
144	29.3%	2.6%	31.9%	63.0%	0.325	0.510	50.4%	4.3%	54.7%	41.3%	0.299	0.298
145	35.7%	5.9%	41.6%	55.1%	0.194	0.376	23.1%	2.8%	25.9%	71.1%	0.204	0.422
149	32.1%	5.7%	37.8%	61.0%	0.223	0.325	32.1%	5.7%	37.8%	61.0%	0.223	0.325
Avg					0.271	0.428					0.289	0.411

Table 20: The Alt 1 map has 10 split counties within the HD East Black Belt cluster, while the enacted plan has 9. Its 1775 cut edges improves on the state's 1887, while also being more compact by Polsby-Popper.

HD	HD East Black Belt Enacted						HD Alt 2					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
33	11.2%	3.1%	14.3%	82.3%	0.371	0.487	18.3%	3.5%	21.8%	75.2%	0.370	0.323
118	23.6%	3.7%	27.3%	69.7%	0.223	0.350	27.0%	4.1%	31.1%	65.9%	0.229	0.342
123	24.3%	4.3%	28.6%	68.1%	0.178	0.295	13.7%	6.0%	19.7%	75.8%	0.293	0.395
124	25.6%	6.2%	31.8%	65.0%	0.233	0.442	25.5%	3.8%	29.3%	68.1%	0.234	0.381
125	23.7%	7.7%	31.4%	63.0%	0.173	0.409	30.2%	6.1%	36.3%	60.1%	0.396	0.670
126	54.5%	3.2%	57.7%	40.0%	0.414	0.516	50.7%	4.2%	54.9%	42.3%	0.394	0.494
127	18.5%	4.8%	23.3%	68.1%	0.201	0.351	17.6%	6.2%	23.8%	67.2%	0.267	0.264
128	50.4%	1.7%	52.1%	46.5%	0.319	0.601	50.2%	1.5%	51.7%	46.8%	0.409	0.672
129	54.9%	4.3%	59.2%	37.2%	0.254	0.482	50.4%	3.6%	54.0%	41.8%	0.248	0.323
130	59.9%	3.9%	63.8%	33.7%	0.255	0.508	57.1%	4.7%	61.8%	35.4%	0.231	0.325
131	17.6%	5.9%	23.5%	68.2%	0.283	0.377	17.6%	5.7%	23.3%	67.8%	0.318	0.373
132	52.3%	7.8%	60.1%	35.6%	0.296	0.270	54.4%	7.1%	61.5%	34.1%	0.219	0.278
133	36.8%	2.1%	38.9%	58.4%	0.415	0.543	46.6%	2.1%	48.7%	49.0%	0.296	0.438
142	59.5%	3.7%	63.2%	34.8%	0.229	0.353	50.1%	3.8%	53.9%	42.9%	0.436	0.605
143	60.8%	4.7%	65.5%	32.3%	0.299	0.502	52.9%	6.3%	59.2%	38.0%	0.143	0.316
144	29.3%	2.6%	31.9%	63.0%	0.325	0.510	51.0%	4.2%	55.2%	40.8%	0.226	0.243
145	35.7%	5.9%	41.6%	55.1%	0.194	0.376	23.1%	2.8%	25.9%	71.1%	0.190	0.359
149	32.1%	5.7%	37.8%	61.0%	0.223	0.325	32.1%	5.7%	37.8%	61.0%	0.223	0.325
Avg					0.271	0.428					0.285	0.396

Table 21: Alt 2 eliminates one county split relative to the enacted plan and has a sharply improved 1604 cut edges.

7.3.4 HD Southeast

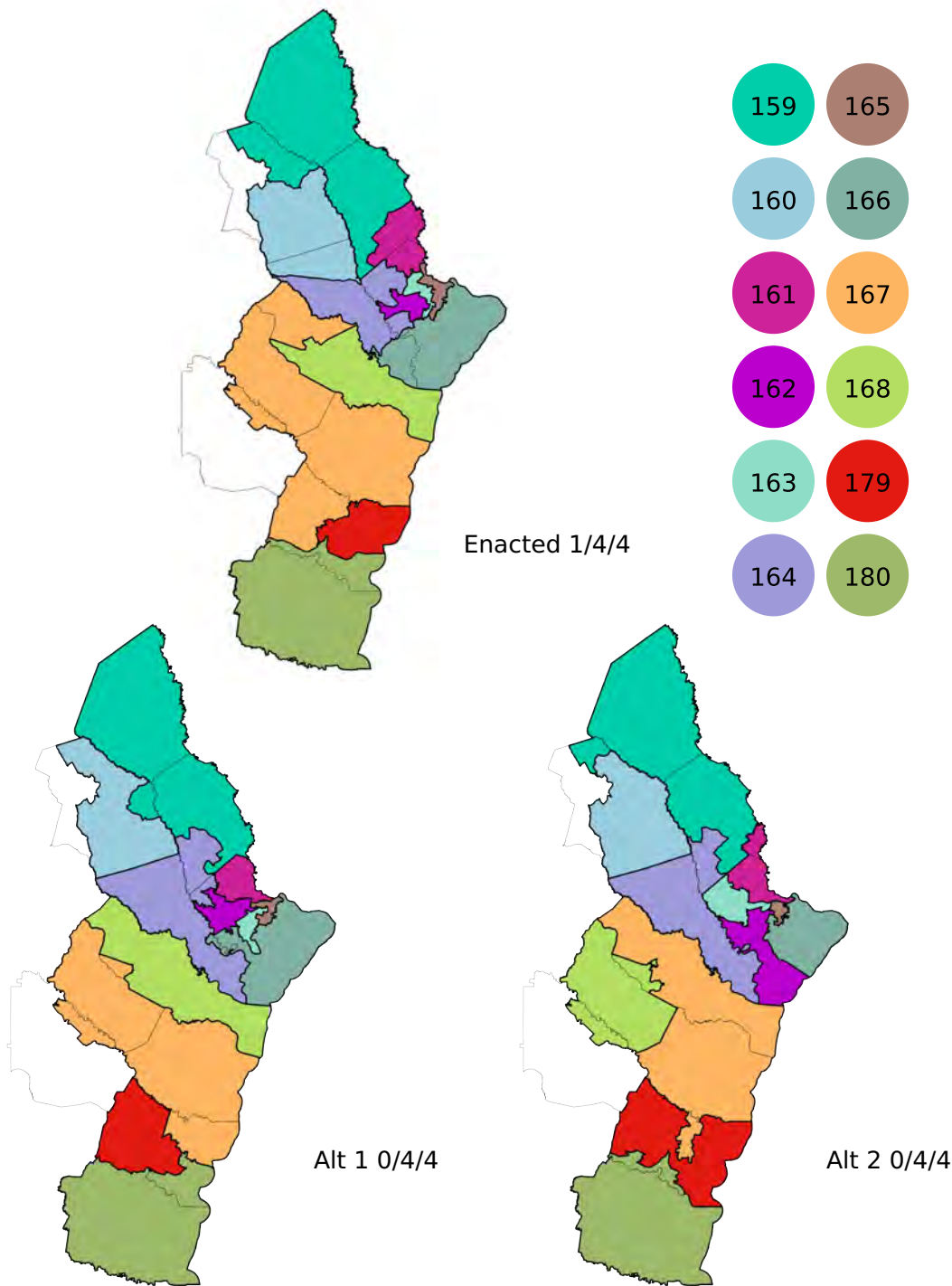


Figure 15: HD Southeast (12 districts).

HD	HD Southeast Enacted						HD Alt 1					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
159	24.5%	2.9%	27.4%	69.4%	0.219	0.345	22.2%	3.7%	25.9%	70.5%	0.204	0.358
160	22.6%	5.0%	27.6%	68.5%	0.369	0.483	26.6%	5.1%	31.7%	64.7%	0.242	0.373
161	27.1%	6.8%	33.9%	60.2%	0.306	0.511	42.1%	8.8%	50.9%	42.7%	0.359	0.475
162	43.7%	9.6%	53.3%	40.6%	0.211	0.366	39.9%	10.5%	50.4%	42.6%	0.147	0.372
163	45.5%	7.4%	52.9%	41.9%	0.175	0.271	44.0%	6.9%	50.9%	43.7%	0.244	0.335
164	23.5%	8.5%	32.0%	60.6%	0.167	0.299	12.9%	5.1%	18.0%	76.5%	0.143	0.309
165	50.3%	5.3%	55.6%	39.2%	0.162	0.230	47.3%	4.7%	52.0%	42.9%	0.189	0.380
166	5.7%	4.1%	9.8%	84.7%	0.364	0.429	7.2%	4.7%	11.9%	82.4%	0.245	0.459
167	22.3%	7.4%	29.7%	66.0%	0.192	0.417	20.0%	6.2%	26.2%	70.1%	0.266	0.327
168	46.3%	10.3%	56.6%	39.3%	0.258	0.243	45.9%	10.7%	56.6%	39.2%	0.236	0.246
179	27.0%	6.4%	33.4%	63.7%	0.417	0.451	32.0%	7.5%	39.5%	56.9%	0.433	0.539
180	18.2%	5.6%	23.8%	71.2%	0.396	0.606	17.0%	5.4%	22.4%	72.8%	0.348	0.594
Avg					0.270	0.388					0.255	0.397

Table 22: HD Southeast Alt 1 has fewer county splits (5 vs. 6) and a better cut edges score (1122 vs. 1245) than the enacted plan.

HD	HD Southeast Enacted						HD Alt 2					
	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock	Black VAP	Hisp VAP	BH VAP	White VAP	Polsby Popper	Reock
159	24.5%	2.9%	27.4%	69.4%	0.219	0.345	22.0%	3.6%	25.6%	70.7%	0.192	0.356
160	22.6%	5.0%	27.6%	68.5%	0.369	0.483	26.3%	5.1%	31.4%	64.9%	0.333	0.515
161	27.1%	6.8%	33.9%	60.2%	0.306	0.511	41.6%	10.0%	51.6%	42.2%	0.180	0.332
162	43.7%	9.6%	53.3%	40.6%	0.211	0.366	43.0%	8.5%	51.5%	42.5%	0.191	0.341
163	45.5%	7.4%	52.9%	41.9%	0.175	0.271	42.7%	7.7%	50.4%	43.1%	0.282	0.411
164	23.5%	8.5%	32.0%	60.6%	0.167	0.299	13.4%	5.5%	18.9%	75.6%	0.168	0.290
165	50.3%	5.3%	55.6%	39.2%	0.162	0.230	45.5%	5.0%	50.5%	44.4%	0.229	0.501
166	5.7%	4.1%	9.8%	84.7%	0.364	0.429	7.2%	4.1%	11.3%	83.0%	0.391	0.653
167	22.3%	7.4%	29.7%	66.0%	0.192	0.417	36.5%	7.4%	43.9%	52.5%	0.204	0.331
168	46.3%	10.3%	56.6%	39.3%	0.258	0.243	40.9%	10.8%	51.7%	44.3%	0.327	0.555
179	27.0%	6.4%	33.4%	63.7%	0.417	0.451	18.7%	6.0%	24.7%	71.6%	0.196	0.454
180	18.2%	5.6%	23.8%	71.2%	0.396	0.606	18.6%	5.7%	24.3%	70.7%	0.346	0.577
Avg					0.270	0.388					0.253	0.443

Table 23: Alt 2 also has just 5 county splits, to go with 1263 cut edges.

## 8 Secondary population estimates for coalition districts

Above, in §3.2, I described my construction of an estimated citizen voting age population for the state of Georgia. In this section, I confirm that nearly all of the majority-BHVAP districts in my alternative plans are still majority districts by BHCVP.

CD	CD enacted	
	BH VAP	BH CVAP
1	34.5%	33.4%
2	54.0%	53.5%
3	28.3%	27.2%
4	63.9%	63.3%
5	55.6%	55.8%
6	18.7%	16.6%
7	50.2%	46.6%
8	35.8%	34.5%
9	23.0%	18.2%
10	28.8%	27.2%
11	28.7%	25.1%
12	41.2%	40.7%
13	76.3%	76.0%
14	24.6%	20.5%

CD	CD Alt	
	BH VAP	BH CVAP
1	36.6%	35.6%
2	51.8%	51.6%
3	57.7%	57.1%
4	58.0%	57.7%
5	60.6%	59.8%
6	24.0%	21.6%
7	55.5%	52.4%
8	33.8%	32.0%
9	15.9%	11.0%
10	24.2%	22.5%
11	24.7%	22.6%
12	43.2%	43.1%
13	57.9%	57.0%
14	18.3%	13.9%

Table 24: The enacted Congressional plan has 5 majority-BHVAP districts, but only four majority districts by BHCVP. My alternative Congressional plan has 6 majority-BH districts by both either basis of population.

Next, I will present the statistics for the Alt Eff 1 and Alt Eff 2 plans in Senate and House, which use the Alt 1 and Alt 2 Gingles demonstrative plans above and add more modular effectiveness-boosting changes.



SD	SD enacted		SD	SD Alt Eff 1		SD	SD Alt Eff 2	
	BH VAP	BH CVAP		BH VAP	BH CVAP		BH VAP	BH CVAP
1	31.9%	31.2%	1	31.8%	31.2%	1	31.8%	31.2%
2	53.8%	54.0%	2	53.7%	54.0%	2	53.7%	54.0%
3	27.1%	24.8%	3	26.9%	24.8%	3	26.9%	24.8%
4	28.6%	27.1%	4	28.6%	27.2%	4	28.5%	27.1%
5	70.4%	65.7%	5	53.9%	45.2%	5	58.6%	52.2%
6	31.5%	30.3%	6	55.5%	55.4%	6	42.0%	39.8%
7	37.2%	34.7%	7	30.6%	28.6%	7	46.2%	43.2%
8	36.3%	35.4%	8	36.2%	35.4%	8	36.2%	35.4%
9	47.4%	44.4%	9	55.1%	51.6%	9	53.1%	50.5%
10	75.7%	75.8%	10	69.4%	68.9%	10	68.5%	68.5%
11	38.4%	36.2%	11	38.4%	36.2%	11	38.4%	36.2%
12	61.2%	60.7%	12	61.1%	60.7%	12	61.1%	60.7%
13	32.8%	31.2%	13	32.8%	31.2%	13	32.8%	31.2%
14	30.5%	26.8%	14	28.8%	26.0%	14	26.5%	24.6%
15	59.8%	59.8%	15	59.7%	59.8%	15	59.7%	59.8%
16	27.5%	26.7%	16	55.6%	54.6%	16	53.7%	52.7%
17	36.6%	35.4%	17	56.8%	56.4%	17	51.2%	50.3%
18	34.6%	33.8%	18	34.5%	33.8%	18	34.5%	33.8%
19	33.7%	31.2%	19	33.6%	31.2%	19	33.6%	31.2%
20	34.5%	34.2%	20	39.1%	38.4%	20	37.0%	36.4%
21	16.0%	13.5%	21	15.9%	13.5%	21	15.9%	13.5%
22	61.2%	61.3%	22	53.6%	53.8%	22	53.3%	53.5%
23	39.6%	39.0%	23	28.0%	27.7%	23	51.1%	51.2%
24	24.0%	23.4%	24	28.3%	27.5%	24	28.1%	27.8%
25	36.8%	36.3%	25	53.5%	53.5%	25	32.4%	31.4%
26	60.8%	60.6%	26	53.4%	53.5%	26	53.9%	53.9%
27	15.0%	11.6%	27	14.7%	11.4%	27	15.0%	11.6%
28	25.6%	24.3%	28	56.7%	56.1%	28	21.6%	20.3%
29	31.0%	30.8%	29	31.0%	30.8%	29	31.0%	30.8%
30	26.6%	24.8%	30	19.2%	17.3%	30	22.0%	19.4%
31	27.7%	25.4%	31	26.4%	24.3%	31	32.0%	30.3%
32	24.9%	21.8%	32	24.8%	21.8%	32	24.8%	21.8%
33	65.1%	61.5%	33	67.5%	65.0%	33	67.7%	65.4%
34	81.2%	80.9%	34	82.6%	83.2%	34	65.4%	64.4%
35	78.5%	78.3%	35	58.0%	56.8%	35	67.4%	66.8%
36	57.7%	57.6%	36	54.9%	55.3%	36	59.9%	60.5%
37	27.5%	24.7%	37	27.4%	24.7%	37	27.4%	24.7%
38	72.9%	73.3%	38	42.4%	40.2%	38	55.8%	56.4%
39	65.6%	67.1%	39	55.9%	56.1%	39	90.9%	91.5%
40	40.2%	33.0%	40	66.6%	64.4%	40	44.9%	35.6%
41	68.5%	69.1%	41	66.4%	66.3%	41	69.8%	70.6%
42	38.9%	37.4%	42	44.6%	44.3%	42	27.0%	23.7%
43	70.5%	69.8%	43	58.2%	57.2%	43	61.0%	60.3%
44	79.0%	79.3%	44	64.5%	65.2%	44	78.6%	79.0%
45	31.1%	28.7%	45	31.3%	28.8%	45	27.2%	24.9%
46	23.6%	22.0%	46	21.2%	19.8%	46	21.2%	19.5%
47	26.8%	24.0%	47	25.2%	23.0%	47	27.2%	24.7%
48	16.1%	16.1%	48	16.1%	15.4%	48	19.3%	17.7%
49	29.6%	20.2%	49	32.4%	22.2%	49	30.7%	20.6%
50	14.3%	10.5%	50	11.4%	8.9%	50	12.6%	10.3%
51	5.5%	3.9%	51	5.5%	3.9%	51	5.5%	3.9%
52	21.1%	18.1%	52	21.1%	18.1%	52	21.1%	18.1%
53	8.2%	6.7%	53	8.2%	6.7%	53	8.2%	6.7%
54	26.2%	16.7%	54	26.2%	16.7%	54	26.2%	16.7%
55	73.6%	73.2%	55	62.6%	60.9%	55	64.9%	64.7%
56	15.0%	13.2%	56	14.9%	13.2%	56	14.9%	13.2%

Table 25: The enacted Senate plan has 17 coalition districts, whether by VAP or CVAP. Both alternative plans add numerous districts, finding additional majority districts in several areas of the state.



HD	HD enacted	
	BH VAP	BH CVAP
1	6.2%	5.7%
2	10.6%	7.4%
3	6.2%	4.7%
4	49.2%	34.8%
5	17.0%	11.1%
6	13.4%	7.8%
7	6.1%	3.7%
8	4.1%	2.9%
9	6.2%	4.9%
10	13.6%	9.2%
11	6.0%	4.8%
12	15.7%	12.6%
13	29.8%	25.8%
14	12.6%	10.4%
15	23.6%	21.3%
16	20.1%	16.7%
17	29.4%	27.4%
18	10.3%	9.4%
19	30.4%	28.8%
20	18.1%	14.5%
21	12.3%	10.0%
22	26.2%	22.6%
23	20.5%	14.1%
24	17.1%	14.1%
25	10.8%	11.0%
26	14.6%	11.0%
27	13.2%	9.5%
28	15.2%	10.6%
29	52.9%	37.6%
30	24.0%	18.9%
31	26.3%	19.6%
32	12.7%	10.7%
33	14.3%	13.4%
34	23.2%	20.2%
35	38.7%	34.8%
36	23.1%	21.6%
37	46.1%	41.2%
38	65.9%	64.0%
39	73.2%	70.6%
40	38.1%	38.6%
41	67.2%	63.0%
42	50.2%	47.9%
43	39.9%	38.6%
44	22.1%	20.2%
45	9.9%	9.1%
46	15.1%	14.0%
47	17.8%	18.2%
48	23.8%	20.0%
49	14.8%	13.5%
50	18.3%	18.4%
51	36.4%	30.0%
52	23.0%	24.5%
53	21.5%	19.6%
54	27.7%	23.8%
55	59.7%	60.2%
56	50.7%	53.6%
57	25.6%	23.8%
58	67.5%	67.9%
59	73.8%	73.9%
60	68.3%	68.1%

HD	HD Alt Eff 1	
	BH VAP	BH CVAP
1	6.2%	5.7%
2	10.6%	7.4%
3	6.2%	4.7%
4	49.2%	34.8%
5	17.0%	11.1%
6	13.4%	7.8%
7	6.1%	3.7%
8	4.1%	2.9%
9	6.2%	4.9%
10	13.6%	9.2%
11	6.0%	4.8%
12	15.7%	12.6%
13	29.8%	25.8%
14	12.6%	10.4%
15	23.5%	21.3%
16	20.0%	16.7%
17	29.3%	27.4%
18	10.2%	9.4%
19	30.2%	28.8%
20	14.4%	11.7%
21	12.3%	10.1%
22	34.4%	31.3%
23	20.4%	14.1%
24	12.9%	10.8%
25	11.5%	11.8%
26	14.2%	11.6%
27	13.2%	9.5%
28	15.2%	10.6%
29	54.8%	39.4%
30	21.8%	16.7%
31	26.2%	19.6%
32	12.7%	10.7%
33	22.4%	21.7%
34	19.5%	17.2%
35	31.9%	29.3%
36	26.5%	24.8%
37	52.9%	47.2%
38	51.9%	50.3%
39	61.7%	58.8%
40	50.7%	50.5%
41	52.5%	50.3%
42	54.9%	50.5%
43	51.0%	51.1%
44	27.5%	22.5%
45	12.7%	11.5%
46	14.0%	13.0%
47	23.0%	23.9%
48	17.9%	16.2%
49	11.3%	10.1%
50	19.2%	19.3%
51	43.3%	36.2%
52	19.5%	19.2%
53	26.3%	22.5%
54	23.0%	20.8%
55	56.0%	58.6%
56	50.7%	52.4%
57	25.2%	23.8%
58	57.2%	57.6%
59	93.5%	93.5%
60	64.5%	64.6%

HD	HD Alt Eff 2	
	BH VAP	BH CVAP
1	6.2%	5.7%
2	10.6%	7.4%
3	6.2%	4.7%
4	49.2%	34.8%
5	17.0%	11.1%
6	13.4%	7.8%
7	6.1%	3.7%
8	4.1%	2.9%
9	6.2%	4.9%
10	13.6%	9.2%
11	6.0%	4.8%
12	15.7%	12.6%
13	29.8%	25.8%
14	12.6%	10.4%
15	23.5%	21.3%
16	20.0%	16.7%
17	29.3%	27.4%
18	10.2%	9.4%
19	30.2%	28.8%
20	15.3%	11.6%
21	12.3%	10.1%
22	36.0%	32.4%
23	20.4%	14.1%
24	14.8%	12.6%
25	10.6%	10.6%
26	14.1%	11.6%
27	13.2%	9.5%
28	15.2%	10.6%
29	52.8%	37.6%
30	22.4%	17.0%
31	26.2%	19.6%
32	12.7%	10.7%
33	21.7%	21.1%
34	16.7%	14.9%
35	34.1%	30.8%
36	23.3%	19.5%
37	56.2%	50.6%
38	53.4%	51.3%
39	60.7%	58.3%
40	51.0%	50.8%
41	52.6%	50.6%
42	54.6%	50.3%
43	51.7%	50.7%
44	25.1%	24.5%
45	10.5%	10.0%
46	13.8%	13.2%
47	22.9%	23.6%
48	18.9%	16.8%
49	11.3%	10.1%
50	18.4%	18.2%
51	40.6%	34.0%
52	20.7%	21.0%
53	27.8%	23.5%
54	20.6%	18.5%
55	95.7%	95.9%
56	50.5%	52.6%
57	26.1%	25.0%
58	52.6%	54.3%
59	64.4%	64.8%
60	55.7%	55.7%

HD	HD enacted	
	BH VAP	BH CVAP
61	81.0%	80.4%
62	78.2%	78.3%
63	77.8%	77.3%
64	37.6%	36.2%
65	65.7%	65.8%
66	62.0%	60.6%
67	66.1%	65.3%
68	61.4%	61.5%
69	68.2%	68.2%
70	35.4%	33.4%
71	25.8%	23.6%
72	27.4%	24.9%
73	18.8%	17.9%
74	30.6%	29.2%
75	84.5%	84.9%
76	79.6%	80.9%
77	87.3%	87.4%
78	79.4%	79.2%
79	86.5%	86.7%
80	36.6%	28.0%
81	42.1%	34.5%
82	23.2%	22.2%
83	43.0%	28.0%
84	75.7%	76.6%
85	67.9%	71.9%
86	78.5%	80.9%
87	78.8%	79.0%
88	72.5%	73.5%
89	65.3%	65.6%
90	62.2%	62.2%
91	75.0%	74.7%
92	72.7%	72.4%
93	74.1%	73.2%
94	75.3%	75.8%
95	74.0%	73.5%
96	58.1%	52.9%
97	45.0%	42.0%
98	74.8%	68.4%
99	22.9%	23.0%
100	19.6%	18.1%
101	41.6%	39.4%
102	57.8%	53.8%
103	33.0%	29.2%
104	27.8%	25.3%
105	44.9%	42.5%
106	46.7%	45.3%
107	59.6%	55.6%
108	35.9%	30.2%
109	67.4%	64.6%
110	56.7%	55.0%
111	30.6%	28.2%
112	22.3%	21.9%
113	65.5%	64.6%
114	28.1%	26.8%
115	58.2%	57.0%
116	64.4%	64.2%
117	41.5%	40.7%
118	27.1%	26.0%
119	23.6%	21.0%
120	21.2%	19.3%

HD	HD Alt Eff 1	
	BH VAP	BH CVAP
61	59.3%	57.1%
62	88.0%	88.6%
63	65.4%	64.8%
64	56.6%	55.9%
65	85.5%	86.8%
66	58.9%	58.1%
67	94.2%	94.5%
68	19.9%	19.2%
69	59.7%	58.8%
70	35.3%	33.4%
71	25.7%	23.6%
72	27.4%	24.9%
73	17.9%	17.0%
74	56.7%	55.1%
75	60.9%	60.2%
76	80.5%	80.4%
77	93.4%	94.0%
78	74.3%	75.6%
79	86.6%	87.1%
80	60.6%	50.4%
81	51.6%	40.1%
82	16.9%	15.9%
83	22.6%	21.7%
84	80.0%	80.5%
85	58.2%	60.3%
86	94.3%	94.4%
87	63.3%	64.8%
88	68.1%	67.6%
89	68.8%	69.6%
90	62.0%	62.2%
91	54.9%	54.1%
92	90.1%	90.5%
93	71.4%	70.4%
94	85.0%	85.2%
95	56.4%	55.6%
96	52.2%	50.1%
97	58.5%	50.7%
98	68.8%	63.7%
99	24.5%	24.6%
100	20.5%	18.6%
101	37.4%	35.3%
102	54.7%	52.1%
103	30.0%	26.3%
104	26.7%	24.2%
105	52.8%	50.2%
106	57.5%	53.1%
107	54.4%	50.2%
108	53.5%	51.3%
109	56.0%	51.2%
110	52.6%	50.9%
111	31.2%	29.5%
112	22.3%	21.9%
113	55.3%	54.3%
114	36.7%	35.4%
115	55.2%	54.9%
116	61.8%	61.6%
117	57.2%	56.6%
118	26.1%	25.2%
119	23.5%	21.0%
120	21.1%	19.3%

HD	HD Alt Eff 2	
	BH VAP	BH CVAP
61	56.7%	54.2%
62	87.5%	88.1%
63	70.8%	70.5%
64	56.5%	55.8%
65	70.9%	71.4%
66	59.2%	58.2%
67	94.6%	95.0%
68	64.3%	64.4%
69	59.9%	59.6%
70	35.3%	33.4%
71	25.7%	23.6%
72	27.4%	24.9%
73	18.6%	17.6%
74	18.1%	17.0%
75	72.3%	73.0%
76	82.6%	83.5%
77	88.2%	88.6%
78	75.6%	75.0%
79	87.2%	87.6%
80	58.5%	50.1%
81	51.1%	36.6%
82	18.4%	17.6%
83	25.4%	23.5%
84	78.2%	79.2%
85	71.3%	75.0%
86	64.5%	65.9%
87	92.8%	93.2%
88	59.8%	57.8%
89	67.7%	68.8%
90	62.0%	62.2%
91	57.4%	56.7%
92	75.4%	74.9%
93	91.6%	92.0%
94	84.8%	85.0%
95	58.0%	57.3%
96	54.0%	50.0%
97	53.5%	47.3%
98	68.8%	63.7%
99	26.3%	26.2%
100	27.9%	26.4%
101	54.7%	50.4%
102	53.0%	50.6%
103	24.4%	19.5%
104	30.3%	28.2%
105	42.3%	41.4%
106	51.8%	50.7%
107	54.3%	50.4%
108	56.2%	50.4%
109	55.1%	50.4%
110	51.8%	50.4%
111	22.9%	20.4%
112	22.3%	21.9%
113	58.7%	58.1%
114	28.3%	27.0%
115	56.1%	55.6%
116	60.0%	59.8%
117	55.6%	55.2%
118	30.9%	29.9%
119	23.5%	21.0%
120	21.1%	19.3%

HD enacted			HD Alt Eff 1			HD Alt Eff 2		
HD	BH VAP	BH CVAP	HD	BH VAP	BH CVAP	HD	BH VAP	BH CVAP
121	15.0%	13.8%	121	14.9%	13.8%	121	14.9%	13.8%
122	39.9%	36.6%	122	39.8%	36.6%	122	39.8%	36.6%
123	28.4%	27.9%	123	19.0%	17.0%	123	19.5%	17.6%
124	31.6%	29.3%	124	32.9%	31.6%	124	29.1%	27.9%
125	30.6%	29.6%	125	31.2%	29.9%	125	35.6%	35.0%
126	57.2%	57.2%	126	55.5%	55.6%	126	54.4%	54.4%
127	22.9%	22.1%	127	19.1%	19.2%	127	23.2%	22.5%
128	51.9%	51.9%	128	51.5%	51.6%	128	51.5%	51.6%
129	58.5%	58.9%	129	54.7%	55.2%	129	53.2%	53.7%
130	63.2%	63.1%	130	58.0%	58.0%	130	61.1%	61.0%
131	23.0%	23.1%	131	31.5%	31.5%	131	22.7%	22.7%
132	59.5%	59.5%	132	60.8%	61.1%	132	60.6%	61.1%
133	38.7%	38.7%	133	50.4%	50.5%	133	48.4%	48.4%
134	37.1%	36.5%	134	37.0%	36.5%	134	37.0%	36.5%
135	25.4%	24.9%	135	25.4%	24.9%	135	25.4%	24.9%
136	32.2%	32.0%	136	32.1%	32.0%	136	32.1%	32.0%
137	55.9%	56.1%	137	54.9%	55.1%	137	51.4%	51.5%
138	22.4%	21.9%	138	22.4%	21.9%	138	22.4%	21.9%
139	26.2%	25.8%	139	26.1%	25.8%	139	26.1%	25.8%
140	64.8%	64.9%	140	64.0%	64.5%	140	70.8%	71.4%
141	63.1%	63.6%	141	59.1%	59.4%	141	55.0%	55.3%
142	62.6%	62.4%	142	53.9%	53.9%	142	53.3%	53.4%
143	65.1%	65.0%	143	58.2%	57.6%	143	58.6%	58.0%
144	31.7%	31.6%	144	54.2%	54.4%	144	54.7%	54.9%
145	41.2%	40.3%	145	25.6%	25.2%	145	25.7%	25.2%
146	32.0%	32.0%	146	27.8%	27.5%	146	29.4%	29.2%
147	36.9%	36.1%	147	38.4%	37.8%	147	37.2%	36.5%
148	36.9%	36.3%	148	41.7%	41.1%	148	43.9%	43.2%
149	37.1%	34.2%	149	37.0%	34.2%	149	37.0%	34.2%
150	59.5%	58.7%	150	56.2%	55.6%	150	56.9%	56.3%
151	49.4%	47.5%	151	58.0%	56.9%	151	52.6%	51.2%
152	28.3%	27.9%	152	37.1%	36.6%	152	36.2%	35.7%
153	70.2%	70.2%	153	55.3%	54.9%	153	63.9%	63.9%
154	56.2%	56.1%	154	51.9%	51.7%	154	64.1%	63.7%
155	37.9%	37.8%	155	37.8%	37.8%	155	37.8%	37.8%
156	37.0%	35.1%	156	36.9%	35.1%	156	36.9%	35.1%
157	33.4%	30.9%	157	33.4%	30.9%	157	33.4%	30.9%
158	35.5%	34.3%	158	35.4%	34.3%	158	35.4%	34.3%
159	27.2%	26.8%	159	25.6%	24.9%	159	25.3%	24.6%
160	27.3%	25.4%	160	31.2%	29.6%	160	30.9%	29.3%
161	33.4%	32.2%	161	50.1%	50.0%	161	50.9%	50.0%
162	52.6%	52.6%	162	49.7%	49.6%	162	50.8%	50.6%
163	52.5%	52.5%	163	50.3%	50.1%	163	49.8%	50.5%
164	31.4%	30.4%	164	17.6%	16.8%	164	18.4%	17.7%
165	55.2%	55.7%	165	51.5%	52.5%	165	49.9%	50.7%
166	9.6%	8.4%	166	11.6%	10.5%	166	11.2%	10.0%
167	29.2%	28.2%	167	25.6%	25.1%	167	43.1%	42.5%
168	55.2%	55.3%	168	55.0%	55.2%	168	50.2%	50.1%
169	36.5%	34.9%	169	32.9%	30.3%	169	35.6%	34.2%
170	32.7%	30.2%	170	39.1%	35.7%	170	35.2%	33.4%
171	44.0%	42.8%	171	54.8%	54.1%	171	40.1%	37.7%
172	36.6%	32.3%	172	34.3%	31.4%	172	39.0%	35.8%
173	41.4%	39.6%	173	40.7%	38.8%	173	34.4%	33.1%
174	25.2%	21.3%	174	24.7%	21.3%	174	24.7%	21.3%
175	29.0%	28.5%	175	26.3%	25.8%	175	22.5%	21.7%
176	30.7%	28.2%	176	29.8%	28.3%	176	32.2%	29.6%
177	59.4%	59.4%	177	59.4%	59.4%	177	59.4%	59.4%
178	19.7%	18.2%	178	19.7%	18.2%	178	19.7%	18.2%
179	33.1%	30.8%	179	39.0%	36.8%	179	24.4%	22.3%
180	23.5%	22.1%	180	22.0%	20.6%	180	23.9%	22.5%

Table 26: Overall, the enacted House plan has 62 majority-BHVAP districts, dropping to 60 majority districts by BHCVP. Both Gingles 1 demonstrative alternatives add to the count significantly.

## 9 Effectiveness-oriented demonstration plans

In §7 above, I presented a number of alternative plans as Gingles 1 demonstrative maps. Each of these plans increases the number of majority districts for the coalition of Black and Latino Georgians, while simultaneously ensuring that traditional districting principles are highly respected and that the new majority districts are likely to provide effective opportunity-to-elect.

In this section, I will offer an additional set of alternative plans—one new example per legislative cluster—that illustrate that my notion of effectiveness is capable of identifying opportunity districts short of the Gingles 1 demographic threshold of 50%+1. Indeed, the existence of crossover support for Black and Latino candidates of choice by Asian-American, White, and other voters is a certainty. The ease of finding alternative plans that draw on broader voting coalitions will bolster the racial gerrymandering discussion below in §10. That is, in the enacted plans, the state has not just avoided majority districts but has even conspicuously limited the number of districts providing effective opportunity-to-elect well below the level that is easily attainable from a race-neutral mapping process.

### 9.1 Congressional effectiveness

As a matter of mapmaking, it is extremely easy to improve on the very limited number of effective districts—just five—in the state's enacted plan (see Table 4). To do this involves relieving the packing and cracking from the enacted plan.

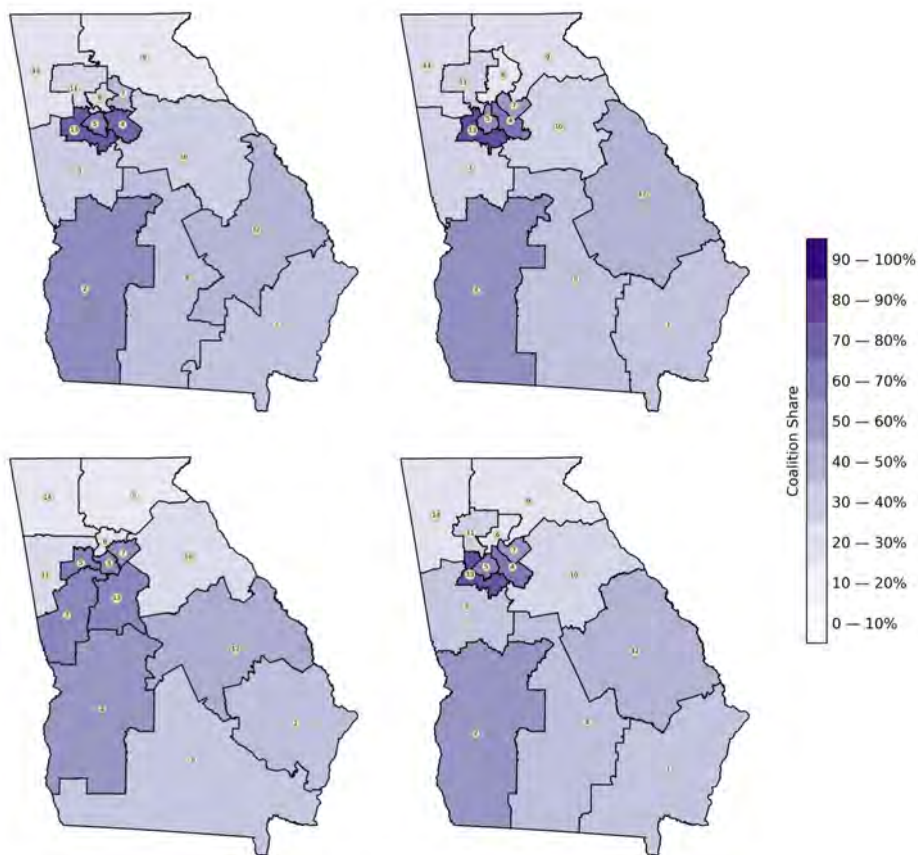


Figure 16: The benchmark plan (top left), the enacted plan (top right), and the Duncan-Kennedy plan (bottom right) all exhibit a pronounced pattern of packing and cracking relative to the alternative Congressional plan presented here (CD Alt, bottom left).

**9.2 State Senate alternatives**

The "Alt Eff 3" plans shown here are another set of effective alternatives; these cover the entire state, working modularly in the clusters from Atlanta, Gwinnett, Southwest, East Black Belt, Southeast, and Northwest Georgia.

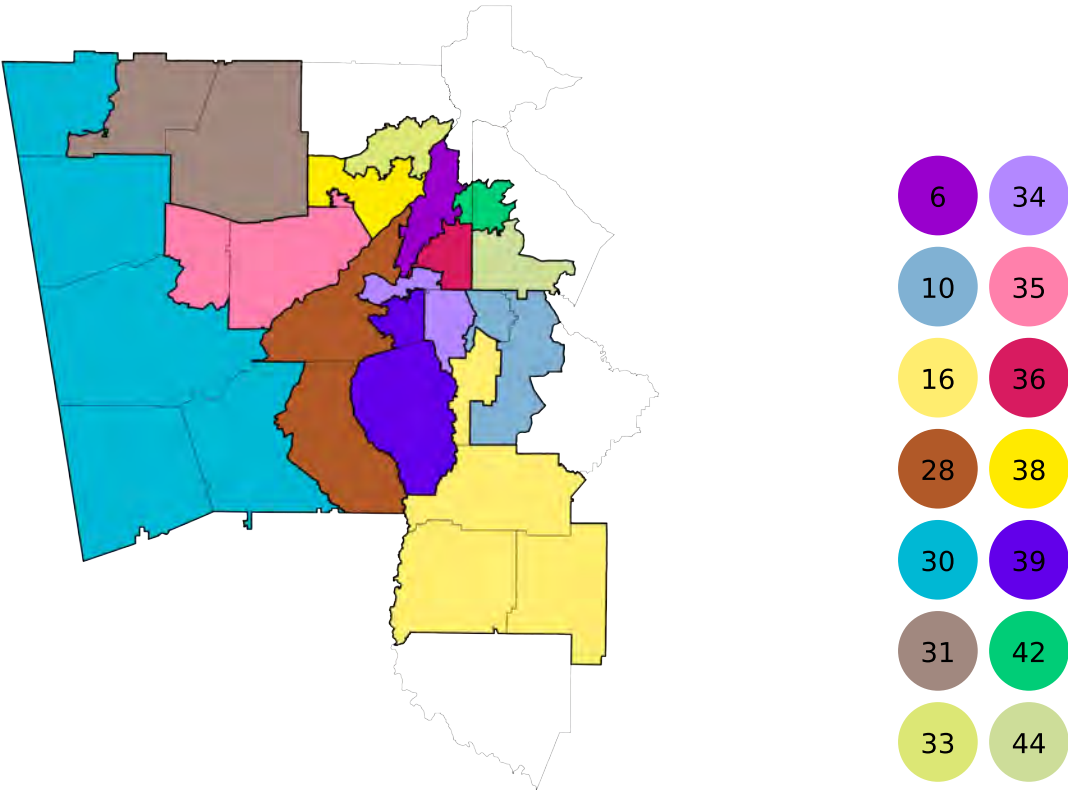


Figure 17: SD Atlanta alternative effective plan.

	SD Atlanta Enacted					SD Atlanta Alt Eff 3			
<b>SD</b>	<b>BVAP</b>	<b>BHVAP</b>	<b>Primaries out of 4</b>	<b>Generals out of 8</b>	<b>SD</b>	<b>BVAP</b>	<b>BHVAP</b>	<b>Primaries out of 4</b>	<b>Generals out of 8</b>
6	23.9%	32.1%	0	8	6	43.8%	50.3%	3	8
10	71.5%	76.7%	4	8	10	60.7%	70.3%	4	8
16	22.7%	27.7%	3	0	16	47.5%	53.4%	4	8
28	19.5%	25.9%	2	0	28	51.9%	57.5%	4	8
30	20.9%	27.0%	2	0	30	17.3%	24.2%	1	0
31	20.7%	28.1%	3	0	31	21.6%	27.6%	3	0
33	43.0%	65.9%	4	8	33	30.3%	50.2%	3	8
34	69.5%	82.2%	4	8	34	76.8%	88.7%	4	8
35	71.9%	79.4%	4	8	35	42.8%	51.4%	4	8
36	51.3%	58.4%	3	8	36	60.1%	66.4%	3	8
38	65.3%	73.7%	4	8	38	46.3%	59.2%	3	8
39	60.7%	66.3%	3	8	39	49.7%	55.6%	3	8
42	30.8%	39.4%	0	8	42	17.2%	27.3%	0	8
44	71.3%	79.9%	4	8	44	76.9%	80.1%	3	8

Table 27: SD Atlanta (14 districts).

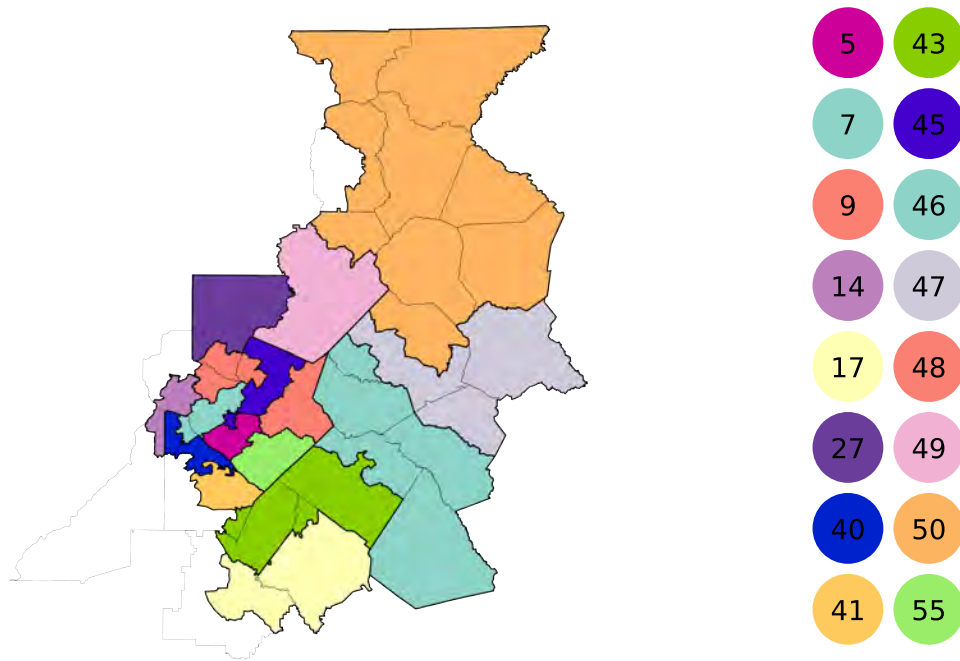


Figure 18: SD Gwinnett alternative effective plan.

SD Gwinnett Enacted					SD Gwinnett Alt Eff 3				
SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
5	29.9%	71.6%	3	8	5	25.2%	61.5%	3	8
7	21.4%	38.0%	3	8	7	20.2%	46.4%	3	8
9	29.5%	48.3%	3	8	9	32.1%	49.2%	3	6
14	19.0%	31.1%	0	8	14	19.0%	31.1%	0	8
17	32.0%	37.1%	3	0	17	46.9%	52.7%	4	7
27	5.0%	15.2%	0	0	27	4.7%	14.9%	0	0
40	19.2%	40.8%	0	8	40	25.6%	39.1%	0	8
41	62.6%	69.3%	3	8	41	84.8%	89.6%	4	8
43	64.3%	71.2%	4	8	43	45.4%	51.8%	4	7
45	18.6%	31.7%	3	0	45	22.4%	42.0%	3	5
46	16.9%	23.9%	1	0	46	12.0%	19.4%	1	0
47	17.4%	27.0%	3	0	47	18.8%	27.5%	2	7
48	9.5%	16.5%	1	0	48	9.9%	16.3%	2	0
49	8.0%	29.9%	1	0	49	8.2%	32.8%	1	0
50	5.6%	14.4%	1	0	50	5.3%	11.3%	1	0
55	66.0%	74.7%	4	8	55	44.0%	54.8%	4	8

Table 28: SD Gwinnett (16 districts).



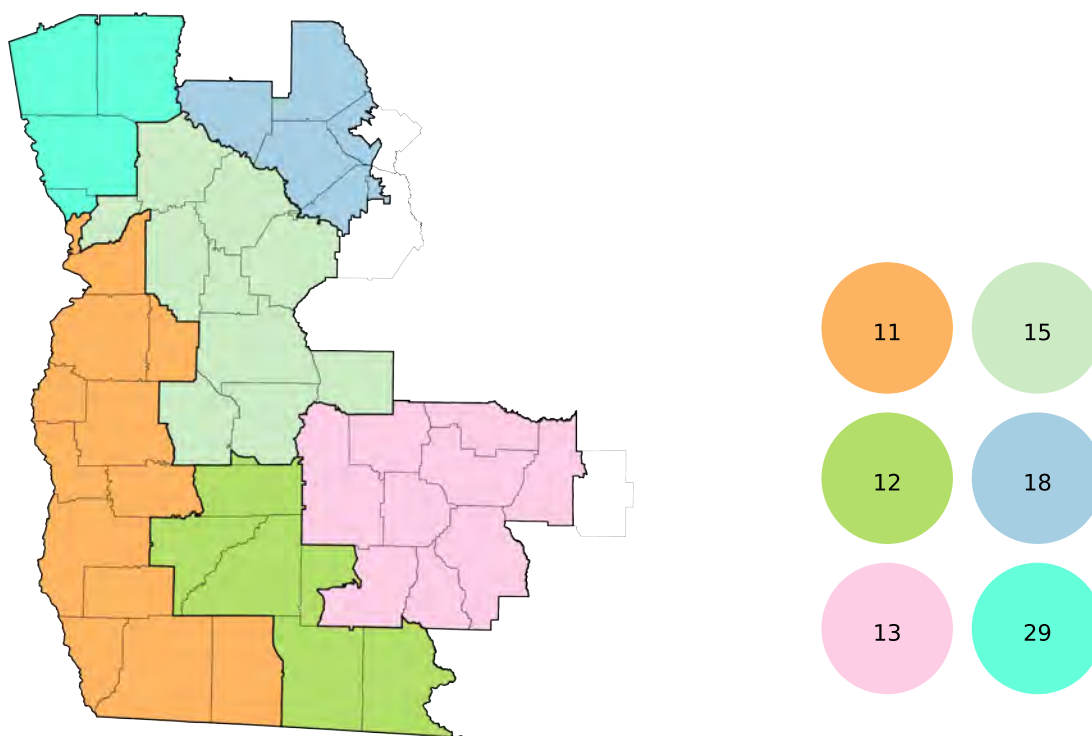


Figure 19: SD Southwest alternative effective plan.

SD Southwest Enacted					SD Alt Eff 3				
SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
11	31.0%	38.6%	4	0	11	44.0%	50.9%	4	6
12	58.0%	61.5%	4	8	12	50.1%	53.4%	4	7
13	27.0%	33.0%	4	0	13	25.6%	34.7%	4	0
15	54.0%	60.6%	4	8	15	50.4%	54.7%	4	8
18	30.4%	34.9%	3	0	18	30.4%	34.9%	3	0
29	26.9%	31.4%	3	0	29	27.3%	31.9%	3	0

Table 29: SD Southwest (6 districts).



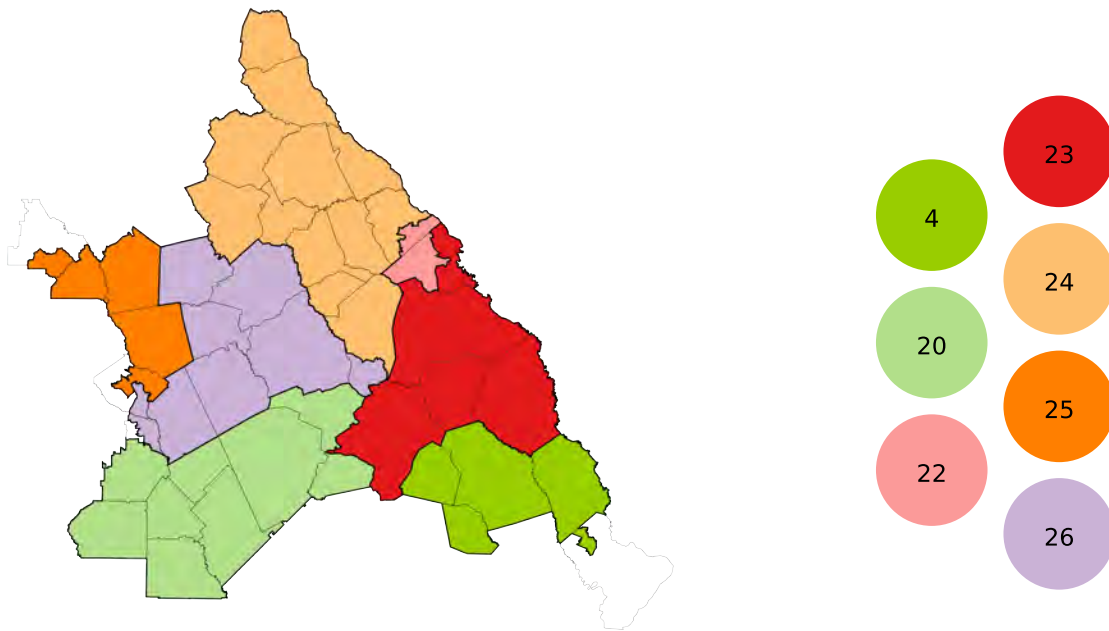


Figure 20: SD East Black Belt alternative effective plan.

SD East Black Belt Enacted					SD East Black Belt Alt Eff 3				
SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
4	23.4%	28.9%	3	0	4	23.4%	28.9%	3	0
20	31.3%	34.8%	3	0	20	32.0%	35.3%	3	0
22	56.5%	61.8%	4	8	22	39.1%	46.1%	4	8
23	35.5%	40.0%	3	0	23	46.1%	49.6%	3	7
24	19.9%	24.3%	3	0	24	26.5%	30.3%	3	0
25	33.5%	37.2%	3	0	25	45.7%	49.6%	3	8
26	57.0%	61.2%	3	8	26	44.0%	48.2%	3	5

Table 30: SD East Black Belt (7 districts).

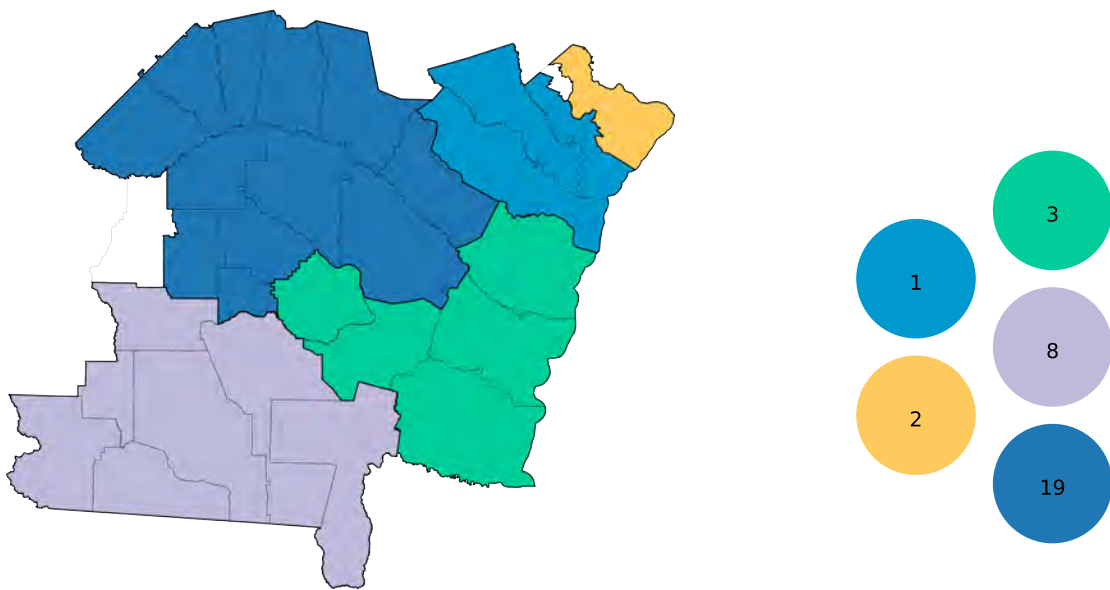


Figure 21: SD Southeast alternative effective plan.

	SD Southeast Enacted					SD Southeast Alt Eff 3			
<b>SD</b>	BVAP	BHVAP	Primaries out of 4	Generals out of 8	<b>SD</b>	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	25.1%	32.6%	3	0	1	34.8%	43.7%	4	6
2	46.9%	54.4%	4	8	2	37.4%	43.6%	3	8
3	21.2%	27.4%	3	0	3	19.1%	24.3%	3	0
8	30.4%	36.6%	4	0	8	32.5%	39.7%	4	0
19	25.7%	34.1%	4	0	19	25.5%	33.8%	4	0

Table 31: SD Southeast (5 districts).

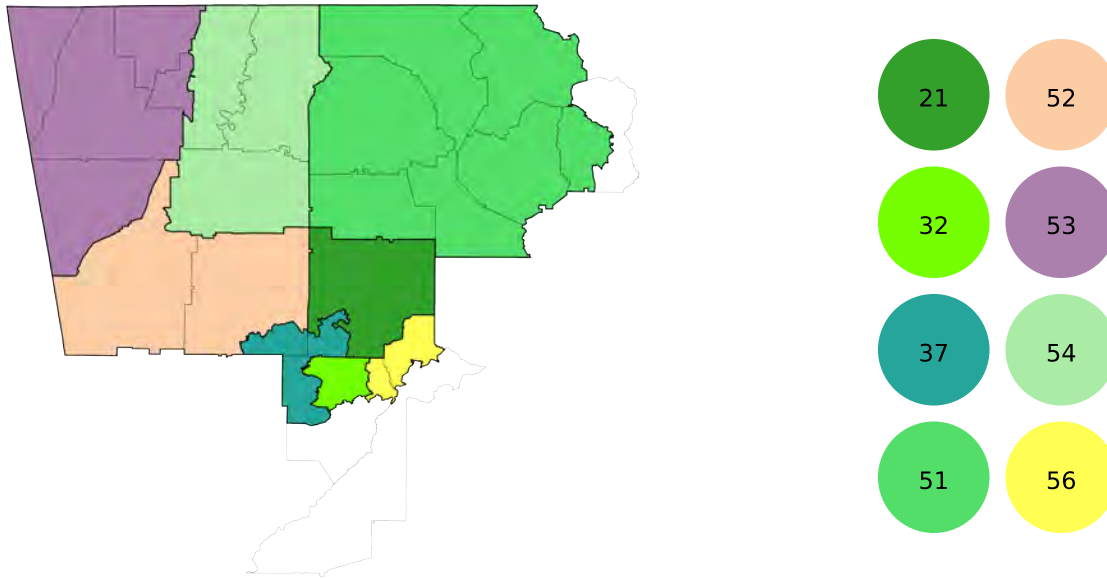


Figure 22: SD Northwest alternative plan that increases effectiveness by creating a competitive SD 32 that is well aligned with Black and Latino preferences in primary elections.

SD Northwest Enacted					SD Northwest Alt Eff 3				
SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
21	7.5%	16.3%	2	0	21	6.5%	16.5%	1	0
32	14.9%	25.4%	3	0	32	21.0%	31.2%	3	3
37	19.3%	28.0%	3	0	37	13.1%	22.1%	3	0
51	1.2%	5.5%	0	0	51	1.2%	5.5%	0	0
52	13.0%	21.2%	1	0	52	13.3%	22.0%	1	0
53	5.1%	8.3%	1	0	53	4.6%	7.5%	1	0
54	3.8%	26.4%	1	0	54	3.8%	26.6%	1	0
56	7.6%	15.3%	0	0	56	8.3%	14.6%	0	0

Table 32: SD Northwest (8 districts).

**9.3 State House alternatives**

The "Alt Eff" (alternative effective) districts in the House cover all of the regional clusters listed above: Atlanta, Cobb, DeKalb, Gwinnett, Southwest, East Black Belt, and Southeast Georgia.

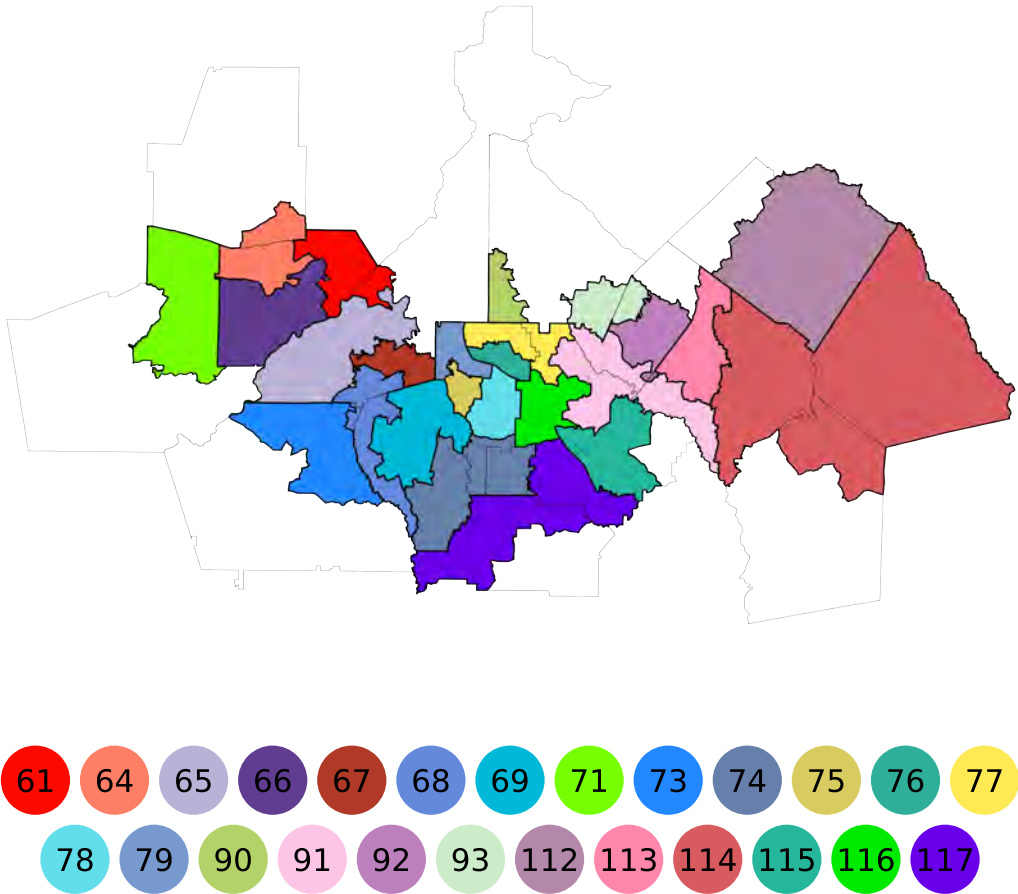


Figure 23: HD Atlanta Alt Eff 3 plan.

HD Atlanta Enacted					HD Atlanta Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
61	74.3%	81.9%	4	8	61	64.9%	74.5%	4	8
64	30.7%	38.1%	3	0	64	43.7%	52.4%	4	7
65	62.0%	66.5%	4	8	65	87.0%	90.2%	4	8
66	53.4%	62.9%	4	8	66	40.5%	48.1%	4	5
67	58.9%	66.7%	4	8	67	89.1%	94.7%	4	8
68	55.7%	62.0%	4	8	68	36.7%	44.4%	3	5
69	63.6%	69.0%	4	8	69	33.6%	40.3%	3	6
71	19.9%	26.1%	3	0	71	19.9%	26.1%	3	0
73	12.1%	19.1%	2	0	73	11.5%	17.9%	2	0
74	25.5%	31.1%	3	0	74	48.5%	54.7%	4	8
75	74.4%	85.7%	4	8	75	78.7%	90.0%	4	8
76	67.2%	80.4%	4	8	76	59.5%	76.4%	4	8
77	76.1%	88.3%	4	8	77	66.1%	80.0%	4	8
78	71.6%	80.5%	4	8	78	70.6%	79.9%	4	8
79	71.6%	87.6%	4	8	79	80.7%	91.3%	4	8
90	58.5%	62.8%	2	8	90	58.5%	62.8%	2	8
91	70.0%	75.9%	4	8	91	43.2%	48.3%	4	6
92	68.8%	73.5%	4	8	92	64.4%	71.2%	4	8
93	65.4%	75.0%	4	8	93	85.1%	92.0%	4	8
112	19.2%	22.5%	1	0	112	19.2%	22.5%	1	0
113	59.5%	66.2%	4	8	113	61.1%	66.9%	4	8
114	24.7%	28.4%	3	0	114	26.0%	30.0%	3	0
115	52.1%	59.1%	4	8	115	47.3%	53.9%	4	5
116	58.1%	65.4%	4	8	116	57.3%	65.3%	4	8
117	36.6%	42.0%	3	0	117	39.6%	45.8%	4	5

Table 33: HD Atlanta (25 districts).

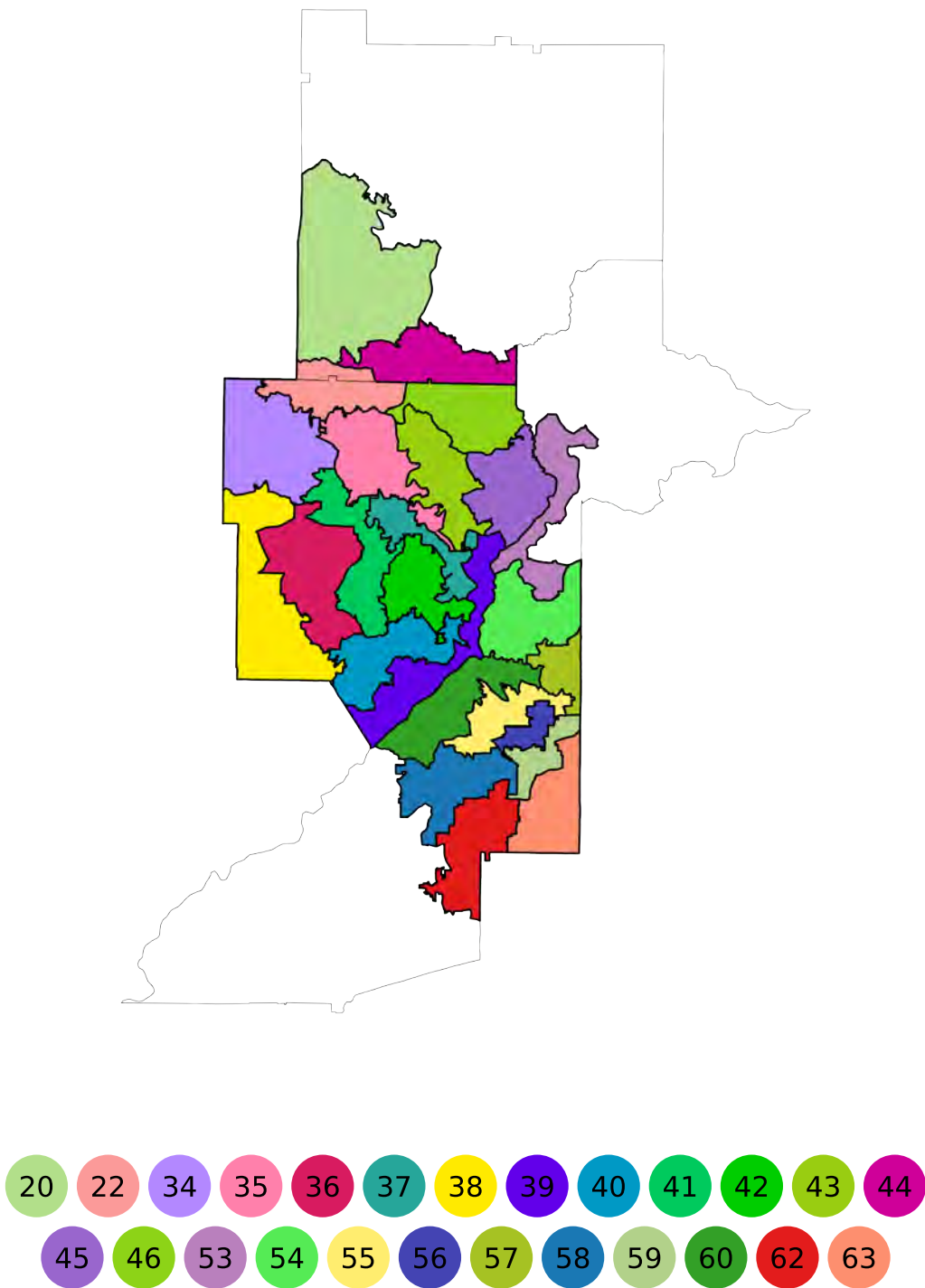


Figure 24: HD Cobb Alt Eff 3 plan.

HD Cobb Enacted					HD Cobb Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
20	9.3%	18.5%	1	0	20	6.9%	14.5%	1	0
22	15.1%	26.7%	3	0	22	22.9%	34.3%	3	5
34	15.7%	23.5%	3	0	34	15.5%	24.2%	3	0
35	28.4%	39.6%	3	8	35	31.2%	44.9%	3	8
36	17.0%	23.5%	3	0	36	38.9%	50.9%	3	8
37	28.2%	46.8%	3	8	37	33.7%	51.8%	3	8
38	54.2%	66.8%	4	8	38	41.9%	51.6%	3	8
39	55.3%	74.0%	4	8	39	45.5%	56.6%	3	8
40	33.0%	38.9%	3	8	40	39.9%	53.3%	3	8
41	39.4%	68.0%	4	8	41	32.3%	52.3%	3	8
42	33.7%	51.1%	3	8	42	28.4%	51.1%	3	8
43	26.5%	40.6%	3	8	43	16.2%	25.9%	3	5
44	12.0%	22.5%	2	0	44	11.2%	24.7%	1	0
45	5.3%	10.2%	0	0	45	5.0%	9.8%	0	0
46	8.1%	15.5%	0	0	46	9.2%	16.6%	0	0
53	14.5%	21.9%	0	1	53	17.5%	32.1%	0	7
54	15.5%	28.3%	0	7	54	12.4%	17.5%	0	1
55	55.4%	60.4%	3	8	55	50.6%	56.1%	3	8
56	45.5%	51.3%	3	8	56	44.2%	51.0%	3	8
57	18.1%	26.1%	0	8	57	18.9%	27.1%	0	8
58	63.0%	68.1%	3	8	58	93.1%	95.3%	4	8
59	70.1%	74.5%	3	8	59	51.2%	56.1%	3	8
60	63.9%	69.0%	3	8	60	57.0%	63.1%	3	8
62	72.3%	79.1%	3	8	62	81.5%	88.7%	3	8
63	69.3%	78.6%	3	8	63	61.6%	70.8%	3	8

Table 34: HD Cobb (25 districts).

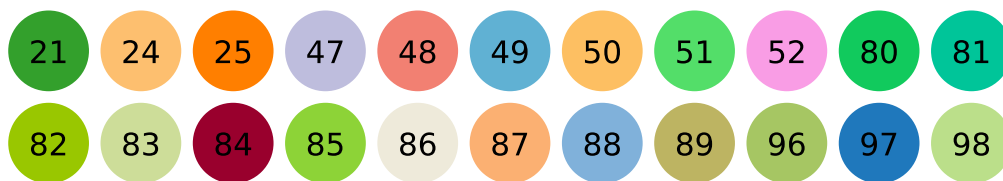
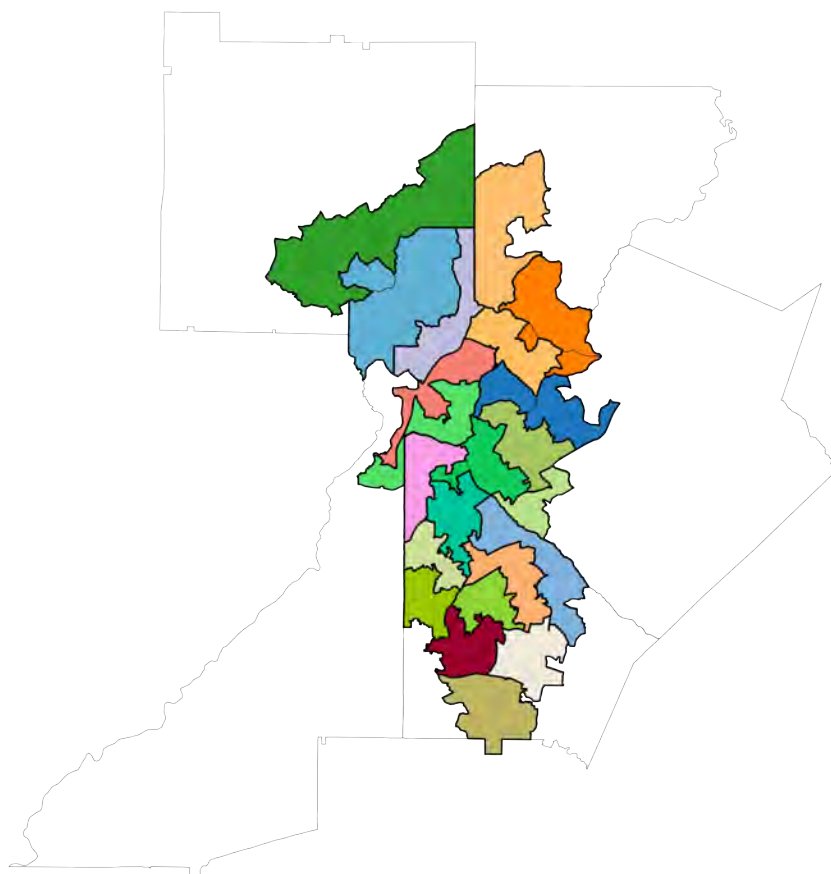


Figure 25: HD DeKalb Alt Eff 3 plan.



HD DeKalb Enacted					HD DeKalb Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
21	5.1%	12.5%	1	0	21	5.1%	12.4%	1	0
24	7.0%	17.3%	1	0	24	7.0%	17.3%	1	0
25	5.9%	11.0%	0	0	25	5.9%	10.7%	0	0
47	10.7%	18.1%	2	0	47	15.7%	31.4%	3	5
48	11.8%	24.2%	0	1	48	20.8%	32.2%	3	8
49	8.4%	15.1%	0	0	49	5.8%	11.0%	0	0
50	12.4%	18.8%	2	8	50	12.6%	19.7%	2	7
51	23.7%	37.0%	0	8	51	16.1%	24.4%	0	6
52	16.0%	23.4%	0	8	52	10.9%	16.4%	0	7
80	14.2%	37.3%	0	8	80	27.2%	60.1%	3	8
81	21.8%	42.7%	0	8	81	16.0%	49.2%	0	8
82	16.8%	23.6%	0	8	82	16.9%	23.2%	0	8
83	15.1%	43.6%	0	8	83	15.0%	36.5%	0	8
84	73.7%	76.7%	3	8	84	62.6%	67.7%	3	8
85	62.7%	68.6%	3	8	85	54.8%	59.4%	3	8
86	75.1%	79.4%	3	8	86	90.8%	94.5%	4	8
87	73.1%	79.8%	4	8	87	60.6%	68.7%	3	8
88	63.3%	73.3%	3	8	88	45.9%	59.3%	3	8
89	62.5%	65.9%	2	8	89	94.7%	97.0%	4	8
96	23.0%	59.0%	3	8	96	20.5%	50.2%	3	8
97	26.8%	46.0%	3	8	97	19.0%	32.8%	3	8
98	23.2%	76.0%	3	8	98	24.4%	71.2%	3	8

Table 35: HD DeKalb (22 districts).

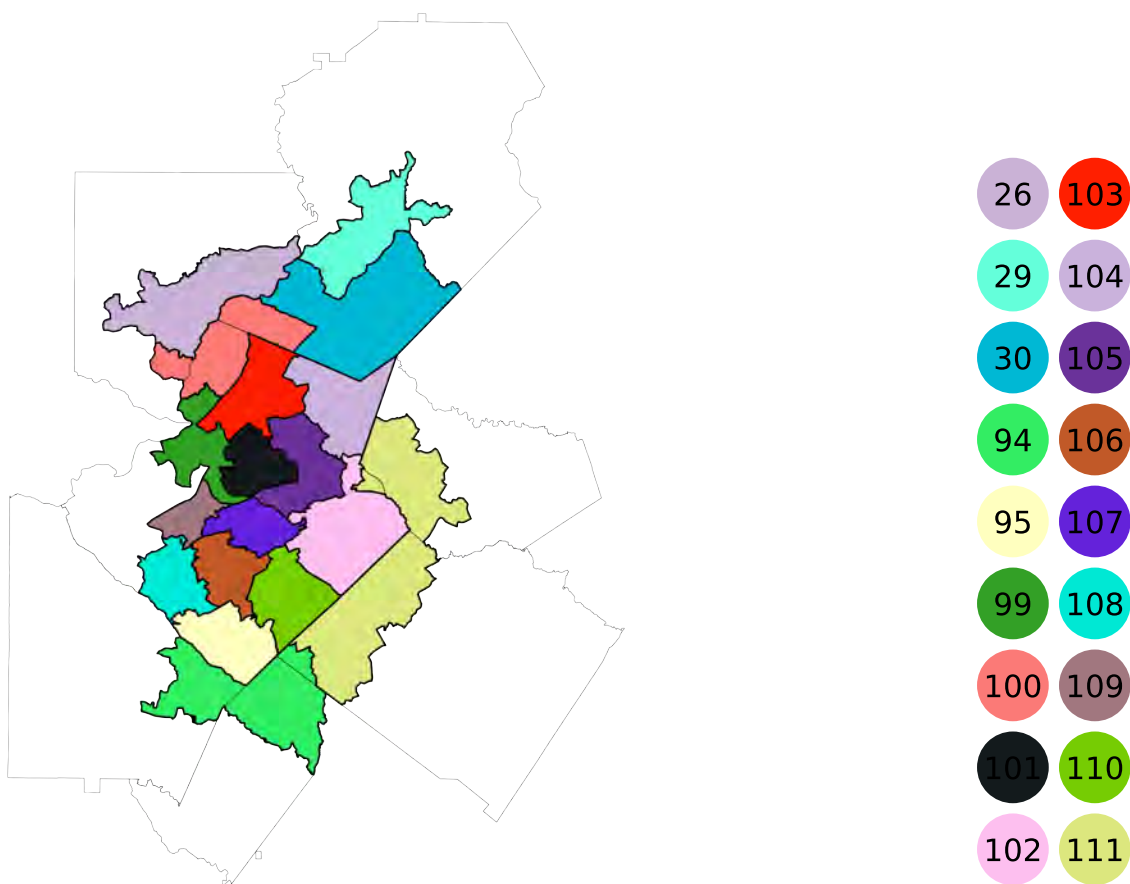


Figure 26: HD Gwinnett Alt Eff 3 plan.

HD Gwinnett Enacted					HD Gwinnett Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
26	4.0%	14.8%	0	0	26	4.1%	14.8%	0	0
29	13.6%	53.3%	2	0	29	13.6%	53.3%	2	0
30	8.1%	24.2%	0	0	30	6.6%	22.7%	0	0
94	69.0%	76.3%	4	8	94	79.8%	84.3%	4	8
95	67.2%	75.1%	4	8	95	59.7%	71.1%	4	8
99	14.7%	23.4%	3	3	99	16.9%	27.3%	3	5
100	10.0%	20.0%	1	0	100	10.1%	21.3%	2	0
101	24.2%	42.4%	3	7	101	24.4%	41.9%	3	7
102	37.6%	58.9%	3	8	102	40.2%	53.3%	4	7
103	16.8%	33.7%	3	0	103	19.5%	35.8%	3	3
104	17.0%	28.1%	3	0	104	18.9%	29.3%	3	0
105	29.0%	45.8%	3	6	105	33.2%	53.2%	3	8
106	36.3%	47.4%	3	7	106	25.4%	40.4%	3	6
107	29.6%	60.7%	3	8	107	30.2%	55.7%	3	8
108	18.4%	36.6%	3	6	108	19.8%	39.6%	3	6
109	32.5%	68.6%	3	8	109	33.5%	72.2%	4	8
110	47.2%	57.7%	4	8	110	47.5%	58.8%	4	8
111	22.3%	31.1%	3	0	111	14.1%	23.0%	3	0

Table 36: HD Gwinnett (18 districts).

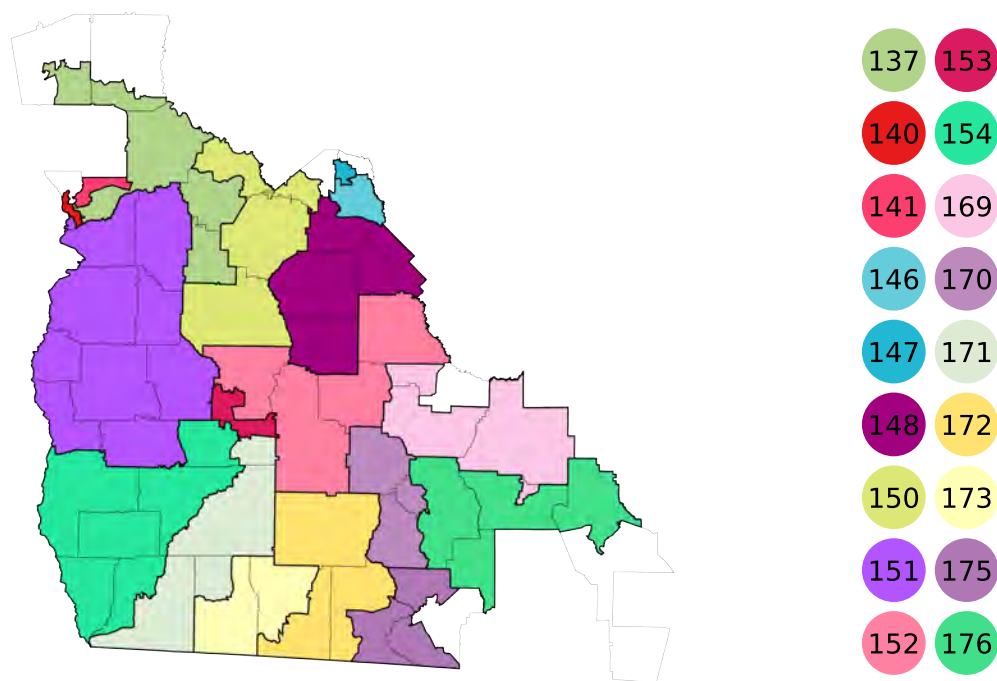


Figure 27: HD Southwest Alt Eff 3 plan.

HD Southwest Enacted					HD Southwest Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
137	52.1%	56.6%	4	8	137	55.2%	58.4%	4	8
140	57.6%	65.6%	4	8	140	59.3%	66.9%	4	8
141	57.5%	64.1%	4	8	141	49.2%	56.1%	4	8
146	27.6%	32.3%	4	0	146	23.9%	29.4%	4	0
147	30.1%	37.3%	4	0	147	31.2%	38.0%	4	0
148	34.0%	37.1%	4	0	148	39.2%	42.4%	4	0
150	53.6%	59.7%	4	8	150	55.0%	60.9%	4	8
151	42.4%	49.7%	4	0	151	45.7%	54.0%	4	7
152	26.1%	28.4%	4	0	152	28.3%	30.7%	4	0
153	67.9%	70.4%	4	8	153	60.3%	62.8%	4	8
154	54.8%	56.5%	4	7	154	50.7%	52.9%	4	6
169	29.0%	36.7%	3	0	169	27.2%	37.2%	3	0
170	24.2%	32.9%	3	0	170	27.7%	36.6%	2	0
171	39.6%	44.2%	4	0	171	47.5%	51.8%	4	0
172	23.3%	36.7%	4	0	172	23.2%	36.2%	4	0
173	36.3%	41.7%	4	0	173	34.5%	39.9%	4	0
175	24.2%	29.2%	4	0	175	24.1%	29.5%	4	0
176	22.7%	30.9%	4	0	176	20.3%	25.7%	4	0

Table 37: HD Southwest (18 districts).

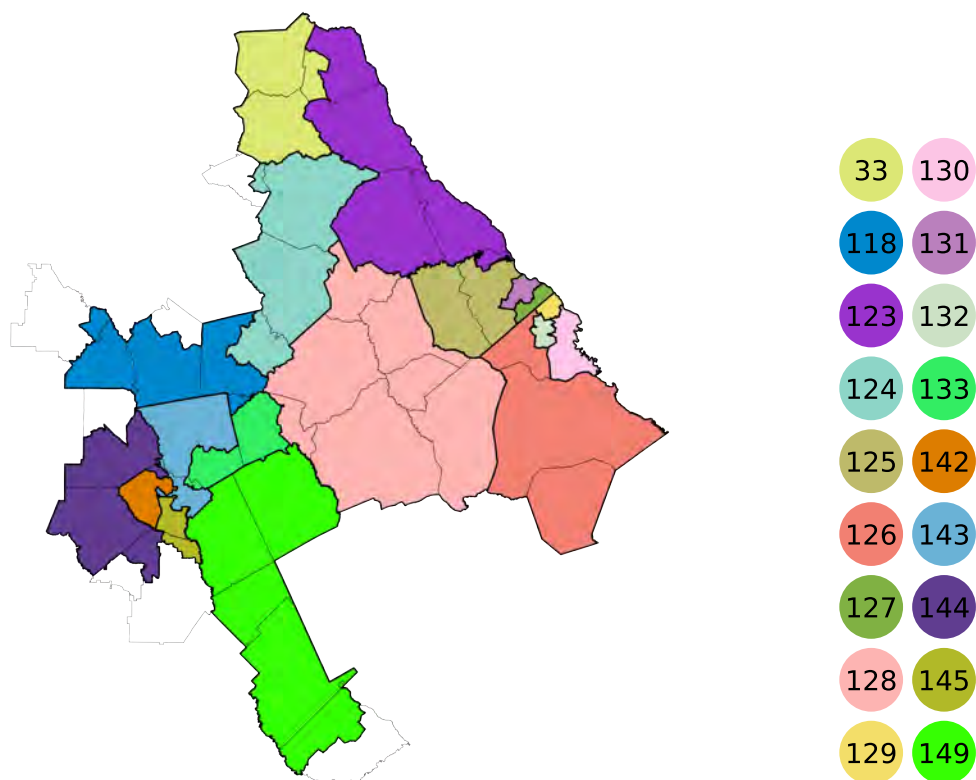


Figure 28: HD East Black Belt Alt Eff 3 plan.

HD East Black Belt Enacted					HD East Black Belt Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
33	11.2%	14.3%	3	0	33	9.3%	13.8%	3	0
118	23.6%	27.3%	3	0	118	22.8%	26.2%	3	0
123	24.3%	28.6%	3	0	123	25.5%	28.5%	3	0
124	25.6%	31.8%	2	0	124	25.3%	31.7%	2	0
125	23.7%	31.4%	3	0	125	30.7%	36.6%	3	0
126	54.5%	57.7%	4	8	126	41.0%	47.5%	4	8
127	18.5%	23.3%	3	0	127	17.2%	23.4%	3	0
128	50.4%	52.1%	2	4	128	51.9%	53.4%	2	7
129	54.9%	59.2%	3	8	129	38.2%	43.1%	3	5
130	59.9%	63.8%	4	8	130	60.6%	63.9%	4	8
131	17.6%	23.5%	3	0	131	18.0%	24.0%	3	0
132	52.3%	60.1%	4	8	132	74.7%	79.5%	4	8
133	36.8%	38.9%	3	0	133	45.4%	47.6%	3	8
142	59.5%	63.2%	3	8	142	42.1%	45.1%	3	6
143	60.8%	65.5%	3	8	143	54.8%	58.7%	3	8
144	29.3%	31.9%	3	0	144	26.0%	29.3%	3	0
145	35.7%	41.6%	3	0	145	55.1%	62.0%	4	8
149	32.1%	37.8%	2	0	149	32.1%	37.8%	2	0

Table 38: HD East Black Belt (18 districts).

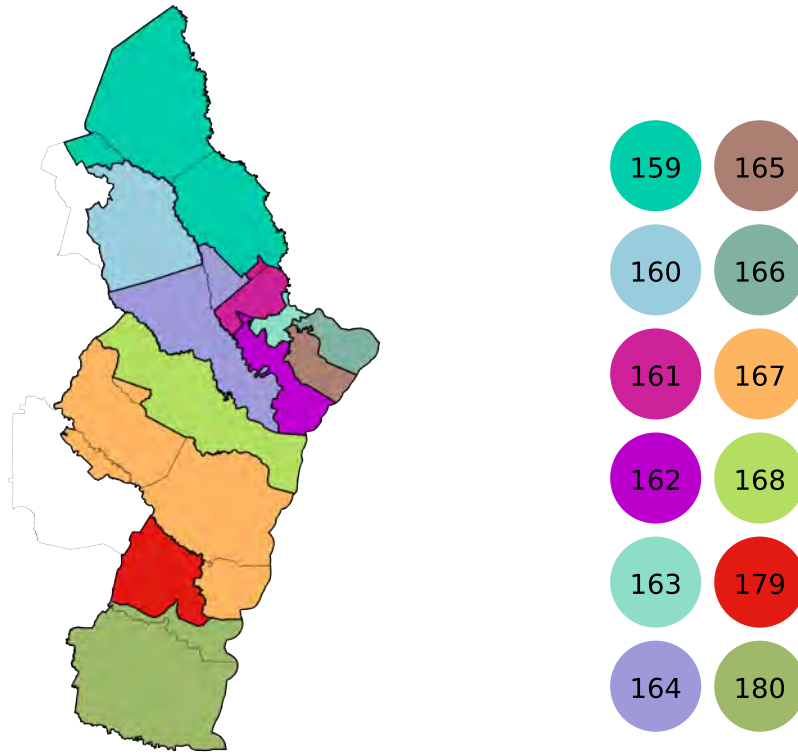


Figure 29: HD Southeast Alt Eff 3 plan.

HD Southeast Enacted					HD Southeast Alt Eff 3				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
159	24.5%	27.4%	2	0	159	22.3%	25.8%	3	0
160	22.6%	27.6%	2	0	160	26.4%	31.5%	1	0
161	27.1%	33.9%	4	0	161	34.1%	42.7%	4	6
162	43.7%	53.3%	4	8	162	38.9%	47.3%	4	8
163	45.5%	52.9%	3	8	163	50.0%	59.4%	4	8
164	23.5%	32.0%	3	0	164	13.6%	19.2%	3	0
165	50.3%	55.6%	4	8	165	27.1%	32.2%	3	5
166	5.7%	9.8%	3	0	166	29.9%	33.7%	3	8
167	22.3%	29.7%	3	0	167	18.7%	24.5%	3	0
168	46.3%	56.6%	4	8	168	45.9%	56.6%	4	8
179	27.0%	33.4%	3	0	179	31.8%	39.4%	4	0
180	18.2%	23.8%	3	0	180	18.2%	23.8%	3	0

Table 39: HD Southeast (12 districts).



## 10 Racial gerrymandering

### 10.1 Retention, displacement, and district disruption

In this section, I will examine the *core retention*, or conversely, the *population displacement*, of the districts in the enacted plan—that is, how much of the population retains the same district assignment before and after the redistricting? I will pay particular attention to the tendency to use racially imbalanced transfers of population in rebalancing the districts, and to the impact on the districts' effectiveness for electing Black and Latino candidates of choice.

#### 10.1.1 Congress

In Congress, the ideal district population is 765,136. Of the fourteen districts, twelve are at least reasonably similar to their benchmark configuration, i.e., at least 2/3 of their population had been assigned to the same district before redistricting. The two with more than one-in-three new voters are districts 6 and 7.

District 6 was nearly at ideal size before the redistricting, having 771,431 residents enumerated in the Census—less than seven thousand off from the target size. However, it was subjected to major reconfiguration, with at least 40,000 people from the benchmark district reassigned to each of districts 4, 5, 7, and 11, while at least 40,000 different people were drawn in from each of districts 7, 9, and 11. In all, this represents reassignment of several hundred thousand people.

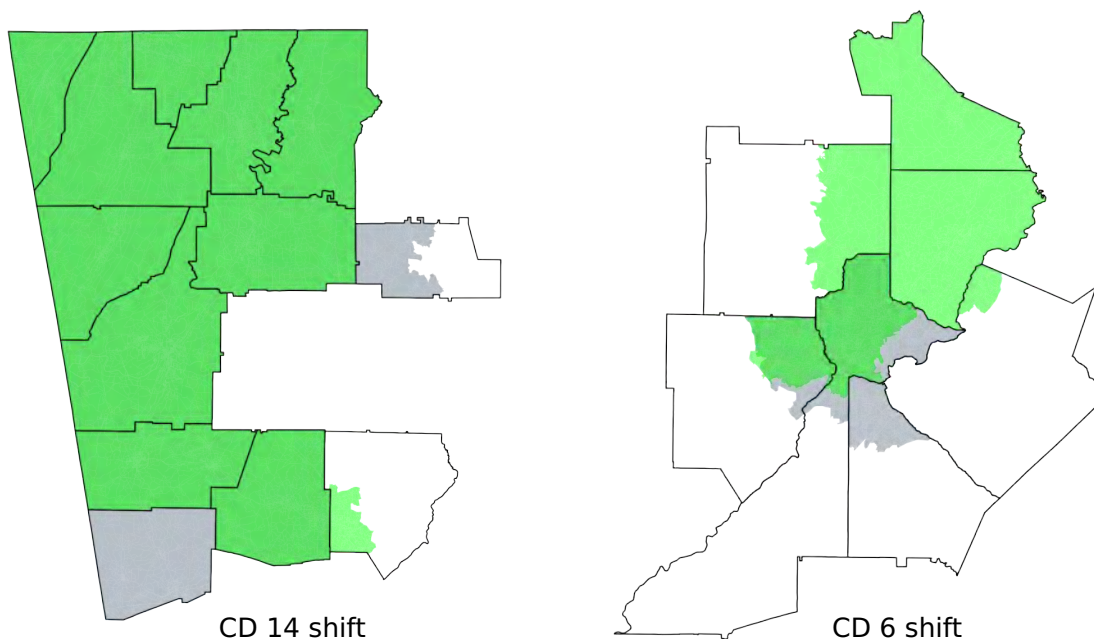


Figure 30: These before-and-after plots show benchmark configurations in gray, while new district placement is in light green. We can see that CD 14 made a new incursion into Cobb County while shedding rural Haralson and part of Pickens County. Meanwhile, CD 6 went sharply the other way, withdrawing from its metro Atlanta coverage and picking up rural counties to the north. Compare to Figure [31](#).

These swaps transfer more urban, more Black and Hispanic neighborhoods out of CD 6, while bringing in Whiter suburban areas. For instance, the largest reassignment out of the district goes from CD 6 to CD 4, and the largest reassignment into the district goes from CD 7 to CD 6—each of those moves roughly 200,000 Georgians to a new district, which is a massive shift. But the CD 6 to CD 4 transfer is 37.5% Black or Latino Georgians; by contrast, the CD 7 to CD 6 transfer is 16.1% Black or Latino. Since CD 6 was a performing district for the coalition of Black and Latino voters before its transformation, and none of the transfers improves representational prospects in non-performing districts, this transition looks to be plainly dilutive of voting power.

Meanwhile, the changes to CD 14 are smaller in terms of land area but are distinctive in terms of density and racial composition. CD 14 has expanded into Cobb to include two majority-Black cities—Powder Springs and Austell. Besides the further fracturing of Cobb County, Figure 31 makes it clear that the movement of those areas of Cobb into the district can't be justified in terms of compactness or respect for urban/rural communities of interest. (See §10.3 for references to the public record of community testimony.)

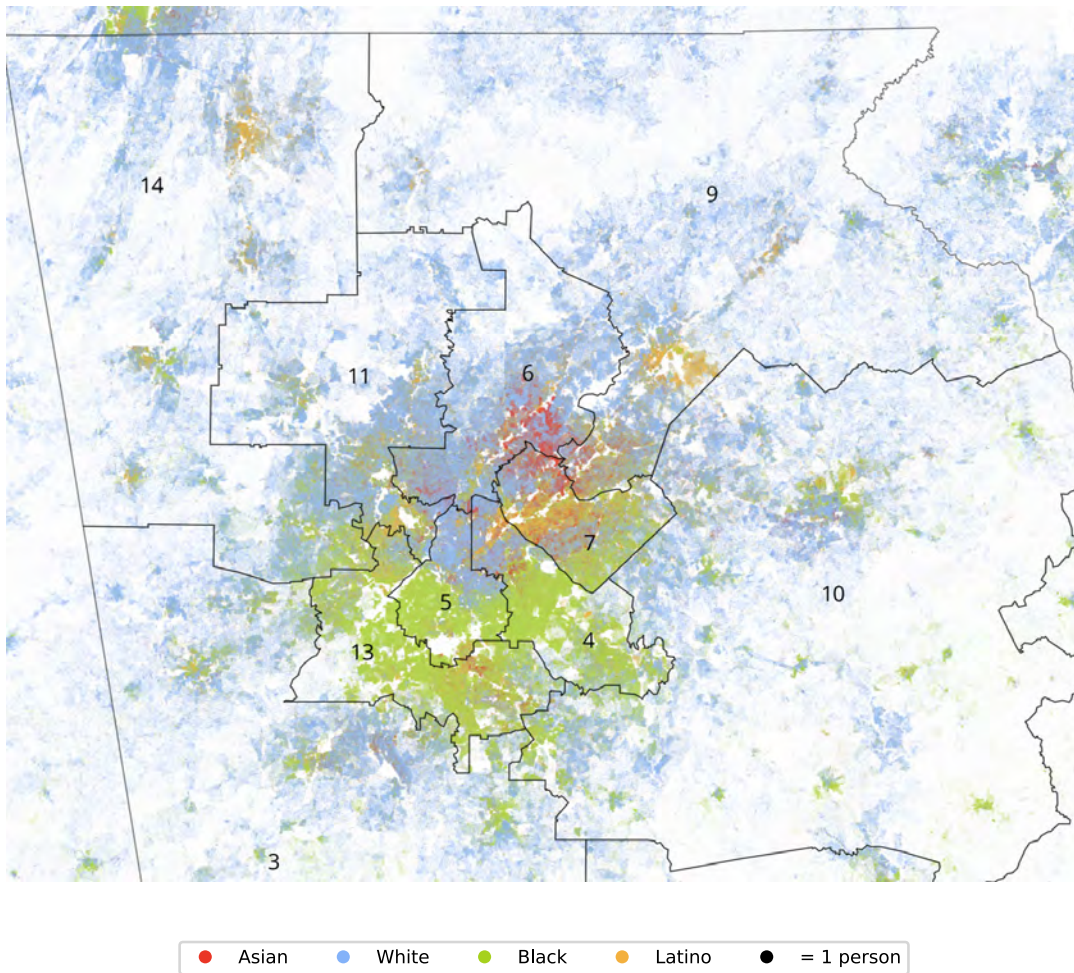


Figure 31: This dot density plot makes it clear—through thicker arrangement of dots, with green dots predominating—that dense African-American neighborhoods in Cobb were brought in at the southern tip of CD 14. These voters were therefore submerged among more numerous, dissimilar communities from CD 14. Meanwhile, the changes to district 6 added suburban/exurban/rural areas—seen with the sparsity at the north of CD 6 in the the dot density plot—unlike the bulk of the district.

This incursion of CD 14 into Cobb is emphatically not required by adherence to traditional districting principles. For one vivid illustration of that, consider the comparison between the Duncan-Kennedy draft map and the map that was ultimately enacted. The benchmark plan from ten years ago had split Pickens County and included Haralson County in its construction of CD 14. Duncan-Kennedy retains Haralson, keeps Pickens whole in CD 9, and splits (low-density, mostly White) Bartow County to achieve population balance. Thus the shift in the final enacted plan—submerging a dense, majority-Black segment of Cobb in CD 14—was not necessary to balance population while keeping Pickens intact.

### 10.1.2 State Senate

When we move to smaller and more numerous districts in the Senate (ideal population 191,284), we might reasonably expect somewhat less core retention as line-drawers balance the traditional principles. However, the disruption in some cases is more than we would expect if retention were a highly prioritized goal. In the Senate, SD 7 and SD 14 have zero overlap with their previous population in the Benchmark configuration, and four other districts—SD 6, 32, 48, and 56—have less than half of their population retained.

New SD 14 is largely composed of benchmark SD 56, which was represented by Republican John Albers. The previous SD 56, which had become competitive over time (with four Republican victories and four Democratic victories across the elections in our probative dataset), was completely moved off of itself, to a new position that gave Biden only 43.7% support. Thus Albers could stay in the district numbered 56, facing largely new but very Republican-leaning voters, and win easily. This was achieved by racially imbalanced shifts: 56 → 14 has 35.5% BHVAP (substantial but still failing to secure electoral alignment in SD 14 with Black and Latino candidates of choice), while each group moved into SD 56 has under 19% BHVAP.

Another consequential district disruption occurred in benchmark district 48, which was represented by Democrat Michelle Au. Roughly two-thirds of the previous population of SD 48 was reassigned into SD 7 (see Figure 32 for geographical displacement). But the 7th district was already Democratic-controlled and was now facing the candidacy of progressive Nabilah Islam, who had been endorsed by civil rights groups including GALEO. The new SD 48 was built to be highly ineffective for Black and Latino preferences (aligned in only one of four primaries and zero of eight general elections from our probative dataset). Rather than run in the new district, Au switched to a run for the lower chamber, ultimately winning HD 50 in 2022. This district makeover was carried out with highly racially imbalanced transfers of population. Of more than 130,000 people moved from SD 48 to SD 7, 37.8% are Black and Latino, while the retained population has only 17.8% BHVAP share; and no territory reassigned into the district has BHVAP share exceeding 23.5%.

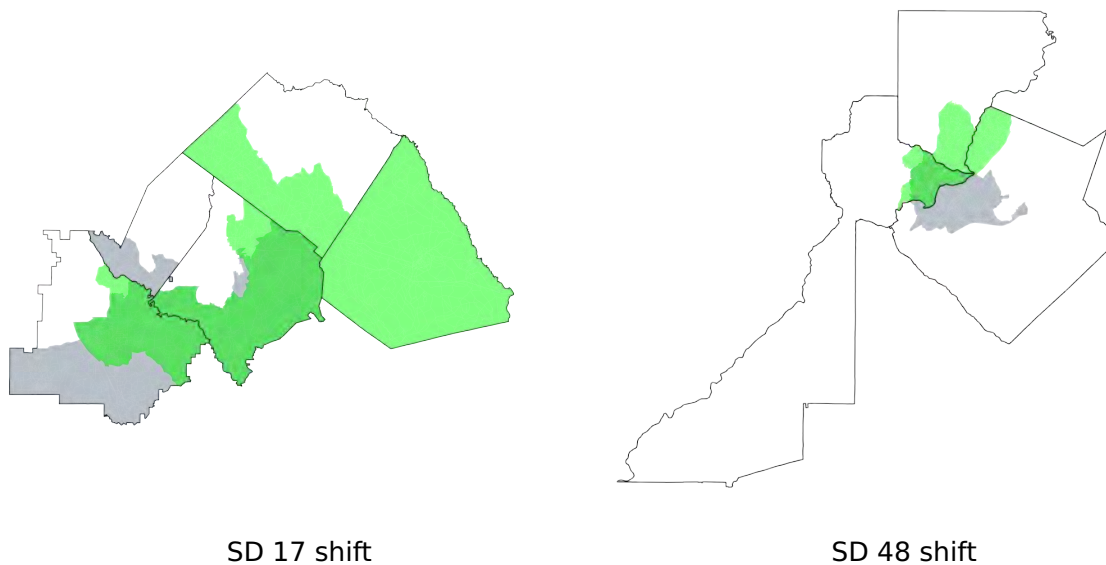


Figure 32: These before-and-after plots show benchmark configurations in gray, while new district placement is in light green. The new configurations are clearly not made to improve compactness, and they increase the number of county traversals.

SD 17 also underwent a makeover: the district had become mildly overpopulated but was changed much more than needed, retaining only about half of its residents. (See, again, Figure [32](#).) Meanwhile, the district was transformed from effective (4/4 primaries, 5/8 generals) to ineffective (3/4 primaries, 0/8 generals). Outgoing population was roughly half Black and Latino (17 → 10 has 52.6% BHVAP, 17 → 25 has 49.0%, and 17 → 43 has 51.3%) while the significant incoming reassignments have much lower shares (25 → 17 has 20.9% and 46 → 17 has 23.8%). Notably, none of the districts that received population from SD 17 thereby became effective.

### 10.1.3 State House

At the House level, the ideal district size of just 59,511 necessitates substantial shifts to the districts, but once again the state's enacted map is highly disruptive, well beyond what is required. Fully 57 districts out of 180 were moved to positions completely disjoint from their benchmark locations. Furthermore, a startling 32 districts were not only moved or relabeled but effectively *dismantled*, with fewer than 30,000 prior residents assigned to any single district, so that no candidate can have the usual benefits of incumbency in terms of familiarity to their voters.

One notable category within these "dismantled" districts is those for which the ten-year demographic shifts had made the benchmark districts amenable to political swings, so that candidates from each major party would have won 2-6 out of 8 general contests in the dataset of probative elections. This includes seven districts: HD 35, 44, 48, 49, 52, 104, and 109. *Zero* of these remain in this "swingy" category after redrawing. Yet five are rebuilt to be ineffective for Black and Latino voters, while only two are made effective. Those that are rebuilt to be ineffective are subjected to racially imbalanced population transfers.



Benchmark HD	Outward	Inward
44	.425 (to HD 35)	.226 (from HD 20)
48	.464 (to HD 51)	.201 (from HD 49)
49	.227 (to HD 47)	.127 (from HD 48)
52	.436 (to HD 54)	.245 (from HD 79)
104	.715 (to HD 102)	.363 (from HD 103)

Table 40: This table records the BHVAP share of the largest district-to-district reassignment for the five "dismantled" House districts that were formerly swingy, now made ineffective. Compare Figure [33](#).

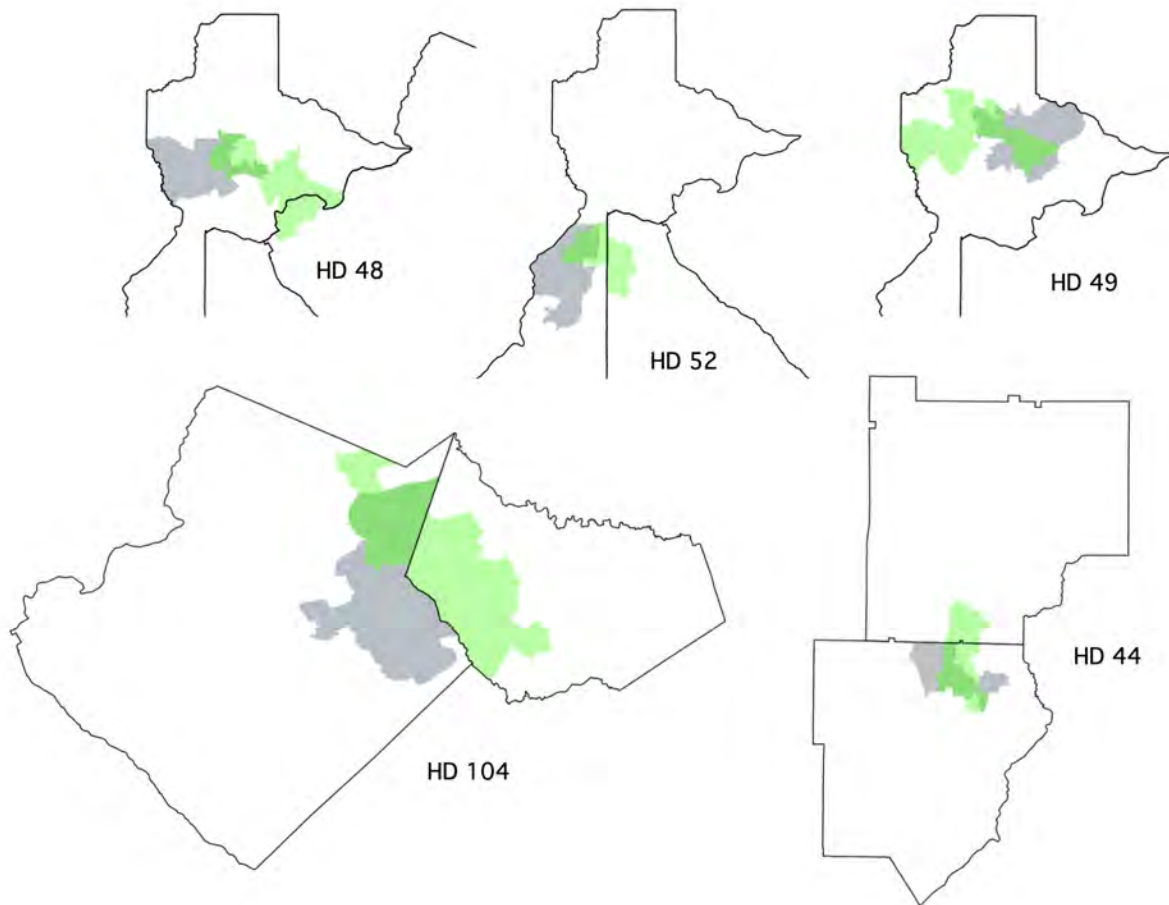


Figure 33: Each of these "dismantled" House districts from the metro Atlanta area (Table [40](#)) was moved in such a way that the previous residents are scattered across multiple districts in the new plan. These districts had become politically swingy in the time since the last Census but are now rebuilt to be likely out of reach for Black and Latino voters' candidates of choice. The images make it clear that the shifts are not explained by traditional districting principles like compactness or respect for county lines. They are not explained by respect for municipal boundaries, as the new locations split small and midsized cities.

10.2 Splitting of geographical units

10.2.1 Congress

Most counties that are split in the enacted plan show marked racial disparity across the pieces. For instance, Cobb County is split across four districts, with CD 13 and 14 receiving parts of Cobb that are collectively over 60% Black and Latino by voting age population, while CD 6 contains a part of Cobb that is about 18.5% BHVAP—consistent with a packing and cracking strategy. Fayette, Fulton, Douglas, Newton, Gwinnett, Muscogee, and Bibb are likewise all split in a way that puts pieces into different districts with at least 20 percentage points disparity in BHVAP across the split.

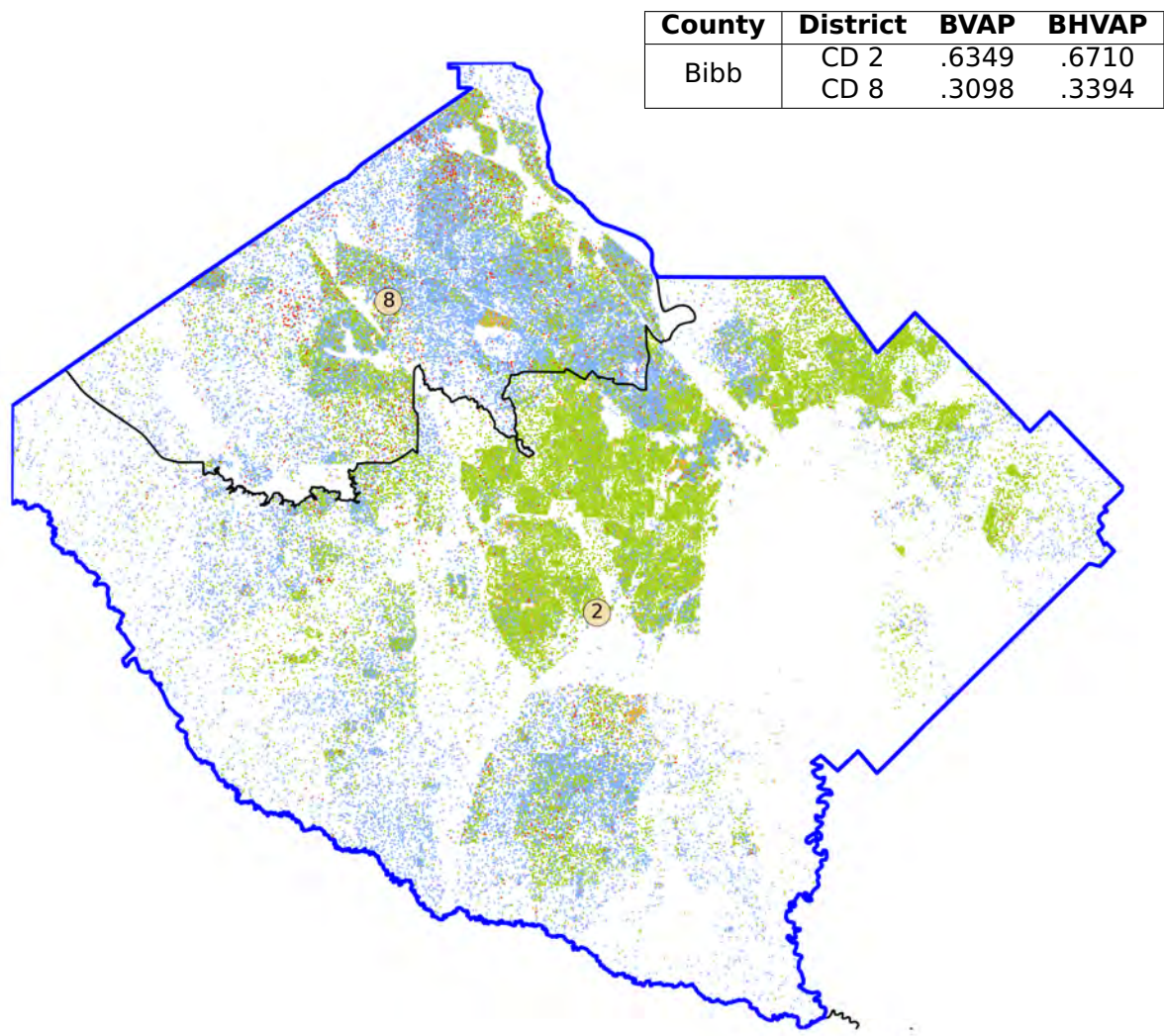


Figure 34: Minutely race-conscious decisions are evident along the boundary of CD 2 and CD 8 in Bibb County.

<b>County</b>	<b>District</b>	<b>BVAP</b>	<b>BHVAP</b>
Cherokee	CD 6	.0304	.0814
	CD 11	.0817	.1902
Clayton	CD 5	.7280	.8649
	CD 13	.7190	.8266
Cobb	CD 6	.1092	.1848
	CD 11	.2654	.3850
	CD 13	.4458	.6271
	CD 14	.4646	.5644
Douglas	CD 3	.2970	.3719
	CD 13	.5762	.6647
Fayette	CD 3	.2094	.2720
	CD 13	.5762	.6647
Fulton	CD 5	.4769	.5379
	CD 6	.1574	.2568
	CD 7	.1175	.1777
	CD 13	.8829	.9171
Gwinnett	CD 6	.1336	.2645
	CD 7	.3234	.5450
	CD 9	.2061	.3433
Henry	CD 3	.4678	.5259
	CD 10	.4414	.4948
	CD 13	.5710	.6324
Muscogee	CD 2	.5262	.5851
	CD 3	.1909	.2578

Table 41: All county splits involving CD 3, 6, 13, and 14. With the exception of the Clayton split, which is unremarkable in demographic terms, each of these is consistent with an overall pattern of cracking in CD 3 and CD 6, packing in CD 13, and submerging a small and diverse urban community in CD 14. See Appendix [C](#) for a complete list of county splits.

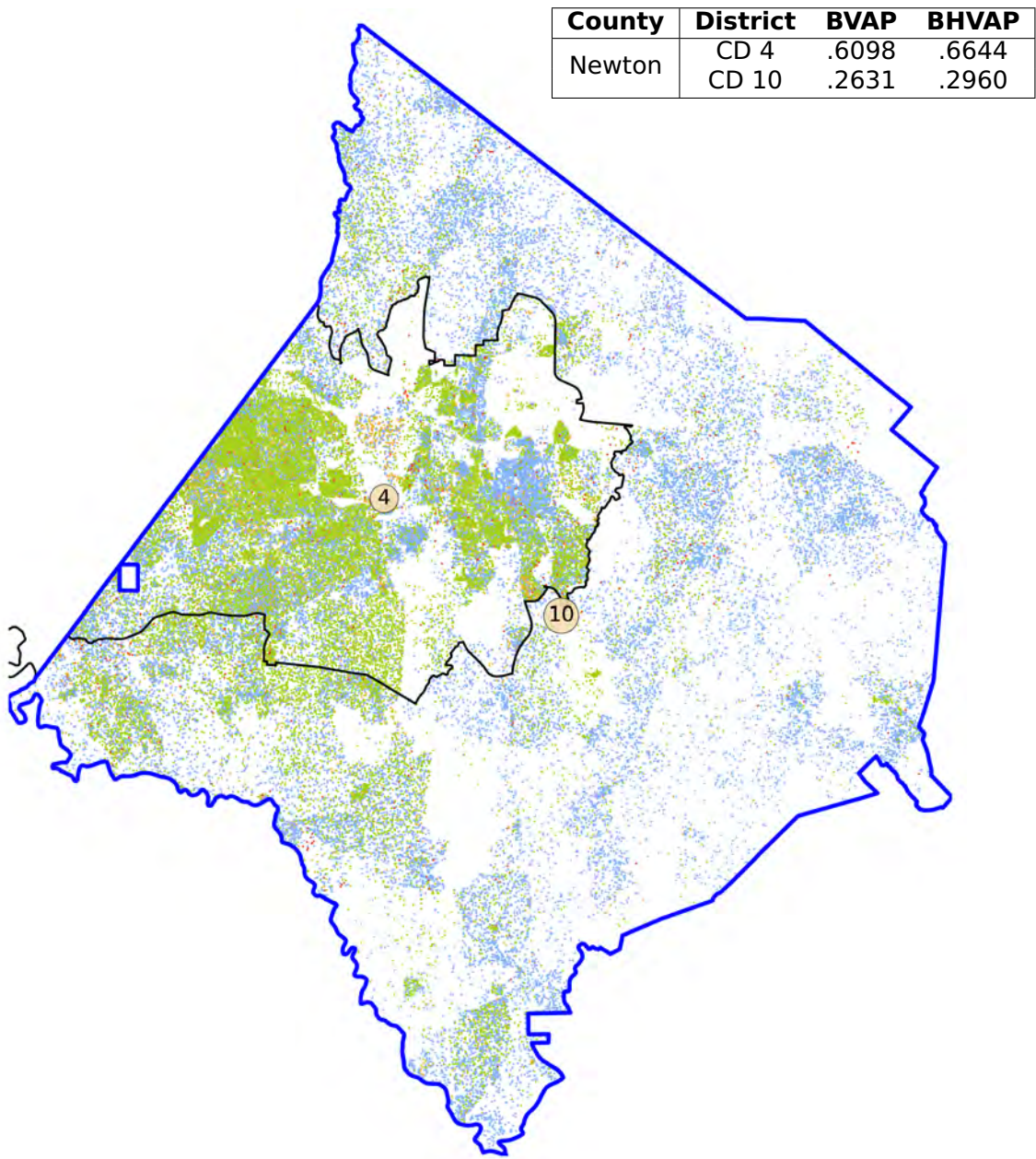


Figure 35: In Newton County, CD 4 and CD 10 are divided by a line that is consistent with packing the former district and cracking the latter.



For the purposes of investigating racial gerrymandering, the splits to state precincts can be especially revealing: these are the units at which cast votes are reported, so finer divisions are usually made in view of demographics but not voting behavior—that is, these highlight the predominance of race over even partisan concerns.<sup>12</sup>

Several pairs of bordering districts show significant demographic disparity across precinct splits in the Congressional plan, especially on the border of CD 4 and CD 10 (in Newton County, as in Figure 35), and on the border of CD 6 and CD 11 (in Cobb and Cherokee counties).

In particular, each precinct split with a sizeable demographic gap on the CD 6/11 border is consistent with the overall theme that CD 6 was targeted to reduce electoral opportunity for Black and Latino voters—and for Black voters, in particular.

State precinct	District	BVAP	BHVAP
MARIETTA 5A	CD 6	.1975	.4938
	CD 11	.4232	.5803
MARIETTA 6A	CD 6	.1391	.6607
	CD 11	.4738	.5464
SEWELL MILL 03	CD 6	.2225	.3042
	CD 11	.4064	.5548

Table 42: Three examples of split precincts on the CD 6 / CD 11 border that show significant racial disparity, consistent with an effort to diminish the electoral effectiveness of CD 6 for Black voters. (Note that CD 6 receives a higher share of BHVAP in Marietta 6A, but a far lower share of BVAP.)

Though the disparity in numbers is suggestive, the previous splits are geographically unremarkable. By contrast, several precinct splits on the CD 4 / CD 10 border stand out both in demographic and geographic terms.

State precinct	District	BVAP	BHVAP
ALCOVY	CD 4	.4010	.4499
	CD 10	.0512	.0620
CITY POND	CD 4	.5912	.6554
	CD 10	.3923	.4192
OXFORD	CD 4	.6444	.6932
	CD 10	.0929	.1213
DOWNS	CD 4	.6429	.7024
	CD 10	.4429	.4930

Table 43: Four examples of split precincts on the CD 4 / CD 10 border, all consistent with packing of CD 4 and cracking of CD 10.

<sup>12</sup>Of course, it is possible to incorporate registered voter data at the block level or to purchase commercial products with partisan modeling, but official state mappers frequently claim not to use this more fine-grained data.

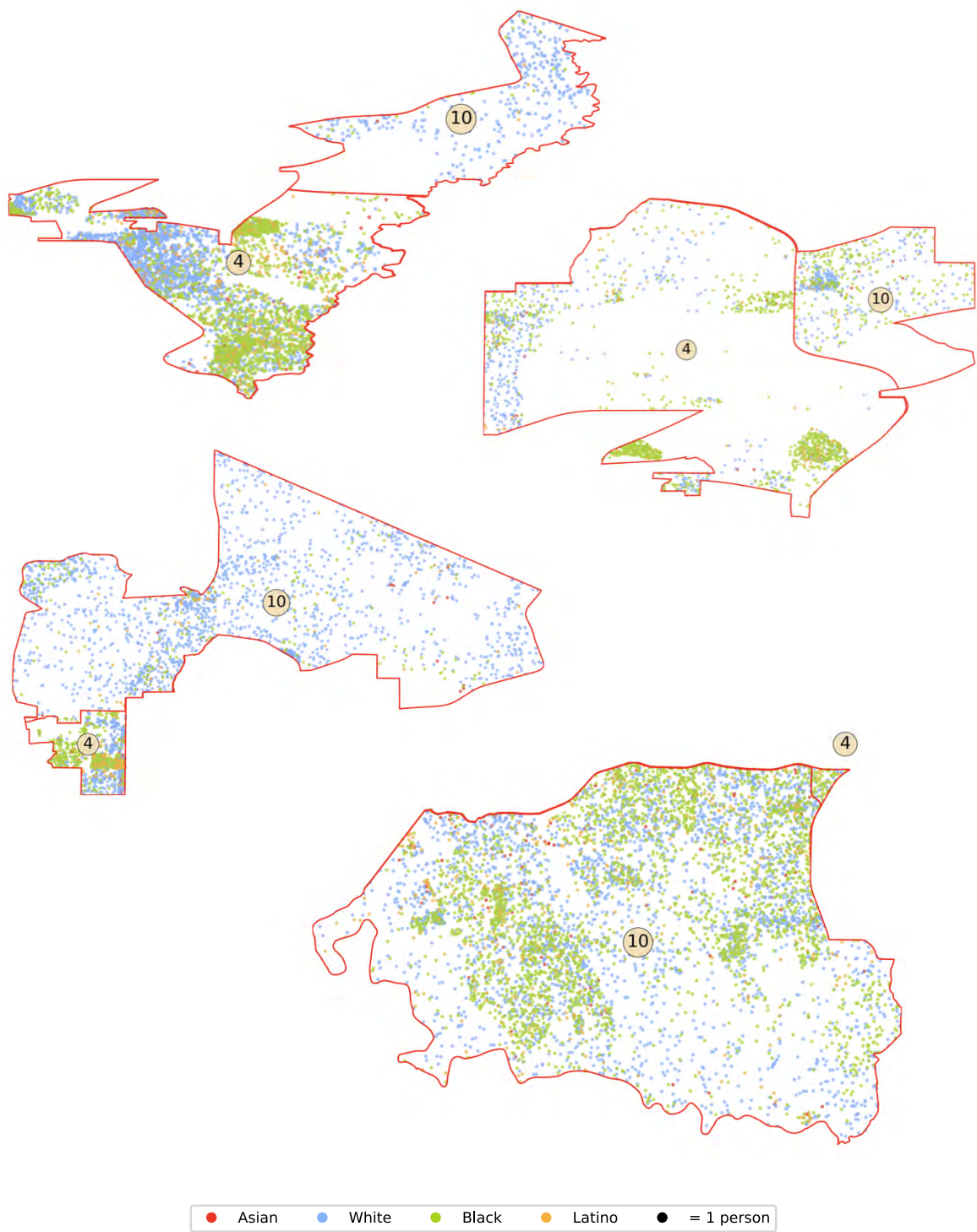


Figure 36: Split precincts on the CD 4 / CD 10 border.

### 10.2.2 State Senate

Similarly, numerous counties are split into unnecessarily many pieces in the Senate plan. Fourteen counties have at least a 20-point disparity in the BHVAP across the splits: Fulton (10 pieces), Gwinnett (9 pieces), DeKalb (7 pieces), Cobb (6 pieces), Bibb, Chatham, Douglas, and Houston (3 pieces each), and Newton, Clarke, Hall, Muscogee, Fayette, and Richmond (2 pieces each). Thirteen state precincts are split with a significant racial disparity between the pieces placed in different districts.

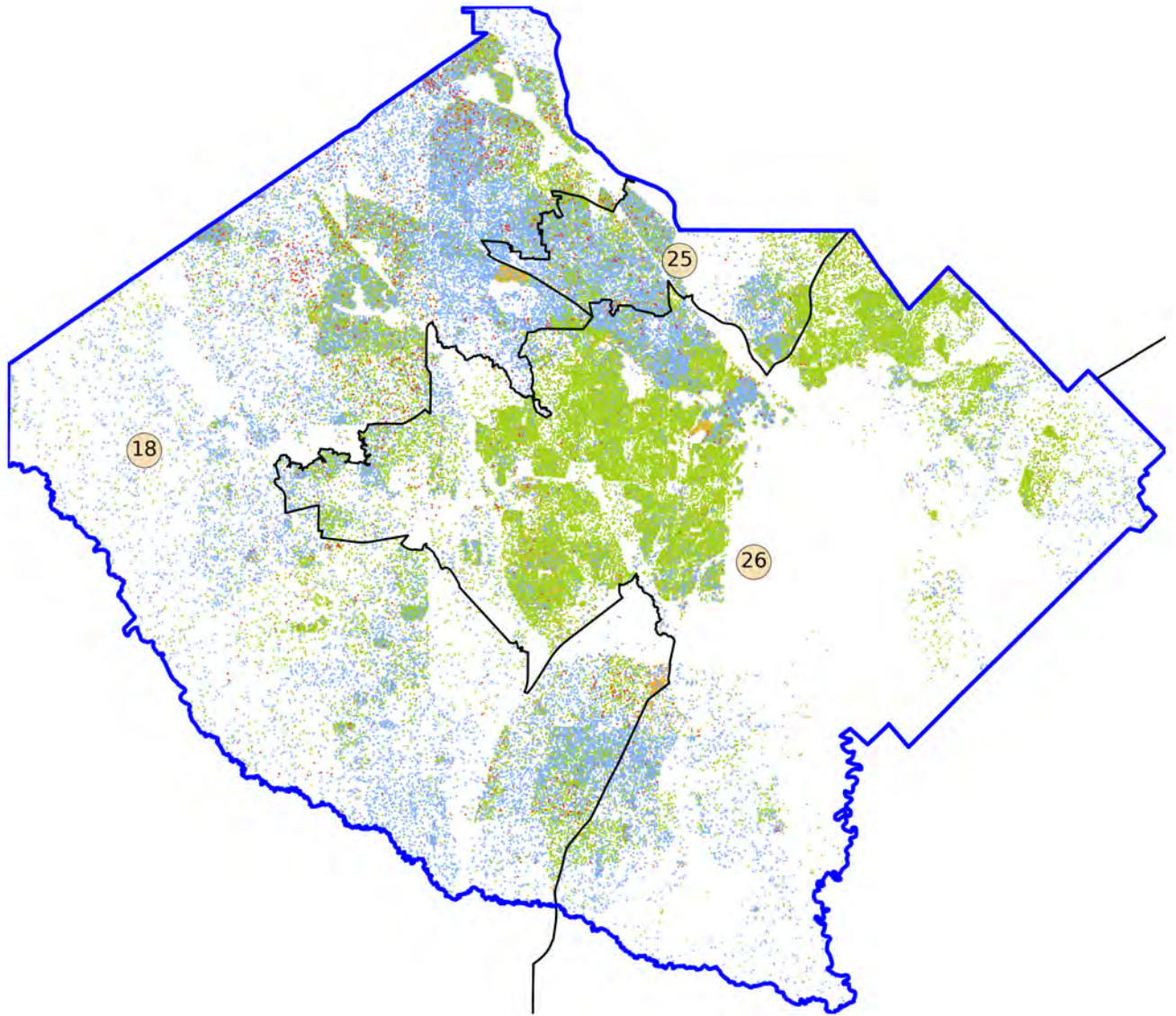


Figure 37: This figure shows the separation of Bibb County in a way that packs SD 26.



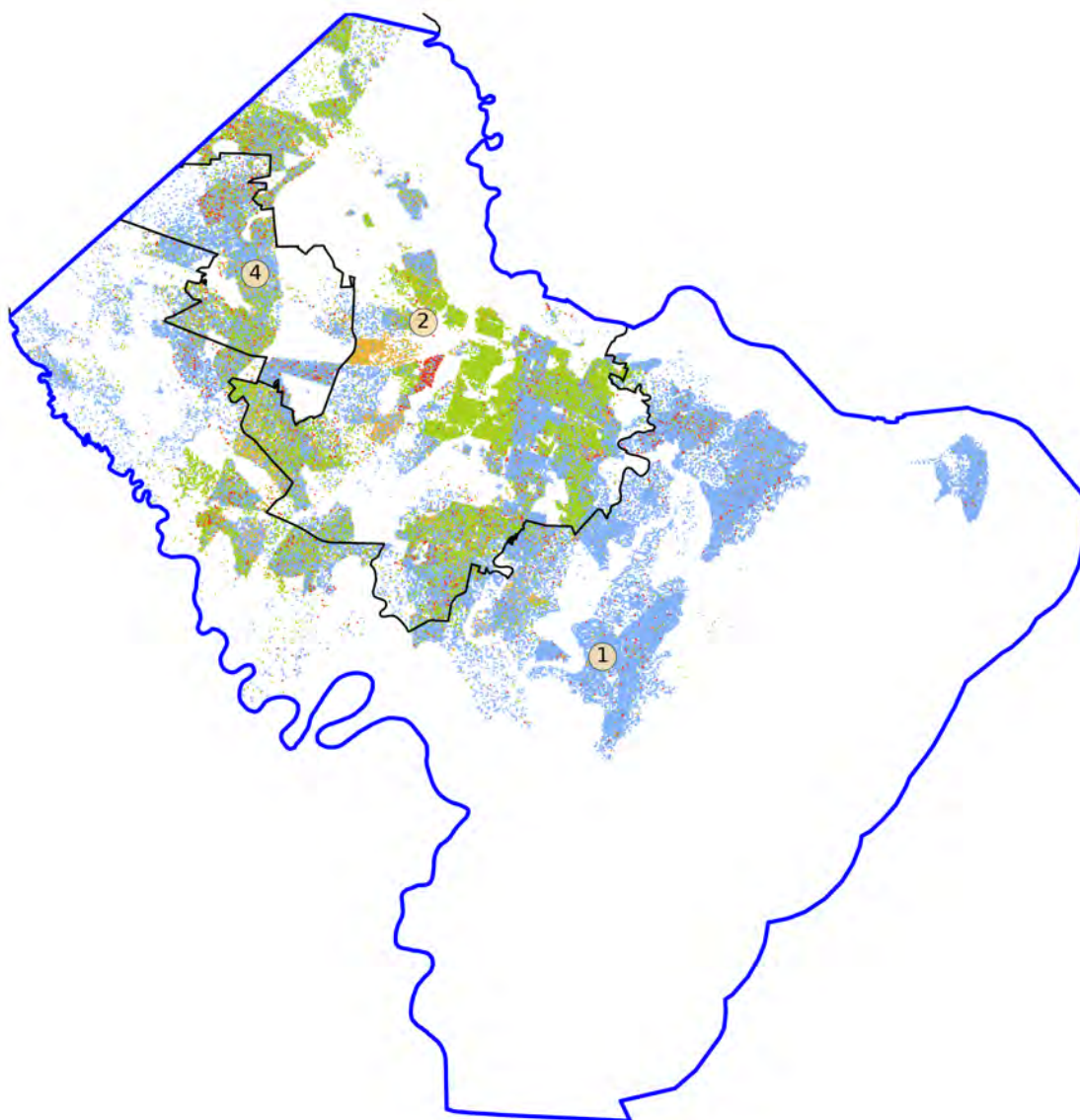


Figure 38: The pieces of Chatham County look to be clearly racially sorted into Senate districts in a way that ensures that Black and Latino voters can only have effective influence in one of the constituent districts. Indeed, SD 2 is an effective district, while SD 1 and SD 4 are not.

### 10.2.3 State House

In the enacted House plan, thirty counties are fractured in a racially sorted way. Besides the large counties that take the brunt of the splitting—Fulton (22 pieces), Gwinnett (21 pieces), DeKalb (17 pieces), Cobb (14 pieces)—there are also Chatham, Henry, Muscogee, Richmond, Hall, Paulding, Houston, Bibb, Coweta, Douglas, Fayette, Lowndes, Newton, Whitfield, Floyd, Rockdale, Carroll, Dougherty, Troup, Thomas, Tift, Peach, Gradie, McDuffie, Lamar, and Telfair, each with 2-7 pieces.

A striking number of state precincts—47 of them—are split with a heavy racial disparity across the division. In the case of dividing up state precincts, legislators can't use cast votes to choose a splitting optimized for partisan performance, so racially distinctive precinct splits provide particularly strong evidence that race has predominated over other principles in the creation of the map.

## 10.3 Community narratives

There was voluminous public input into the record when it comes to the communities of interest around the state and the impacts of redistricting decisions on their access to effective representation.

At the highest level, **County** identity and **Urban** versus **Rural** interests were the most frequent themes of the testimony, with thousands of mentions in the record. Geographically delimited regions that received frequent mention included the **Mountain** region in the Northwest and the **Black Belt** across the state's middle. Less specific geographic terms like **Lake** and **River** recur as well. **University** (or **College**) and specifically **HBCU** get plentiful mentions, and **Language** (in the sense of language accessibility) is a frequent concern.

Other frequent keywords recur in patterns that largely disaggregate by urban/suburban/rural focus. Here is a sample of terms that occur ten or more times and fall largely along lines of that classification.

- Urban: Rent/Renters, Affordable, Housing, Utilities (esp. Water)
- Urban: Poverty, Healthcare, Safety
- Urban: MARTA, Transit
- Suburban/Exurban: Corridor, Car
- Suburban/Exurban: Family, Diversity, Immigrant
- Suburban/Exurban: Park, Church, Restaurant
- Rural: Agriculture, Poultry/Chicken, Onion (incl. Vidalia, Onion Belt)
- Rural: Manufacturing, Carpet, Flooring, Industry
- Rural: Hospital, Internet, Elderly

These community testimonials are helpful for clarifying the issues around the changes to CD 6 and CD 14 that have received considerable attention above. New areas brought in to CD 6 on its north side (all of Forsyth and Dawson counties and half of Cherokee) cite interests frequently cited in suburban areas, blending to rural. By contrast, CD 6 shed population from Fulton and the northern tip of DeKalb County.

- Forsyth, Cherokee, Dawson: road infrastructure, Lake Lanier, Army Corps of Engineers, immigration (esp. Asian) and language, rural identity
- Fulton, DeKalb: public transportation, MARTA, safety net, COVID disparities, food insecurity

As we have seen, the shift in CD 14 is arguably a ripple effect from the targeting of CD 6, and residents of the new district are likewise vocal, with a sharp split between the narrative elements in the core of CD 14 and in its new protrusion into Cobb.

- Northwest counties: mountain, rural, flooring, agriculture, manufacturing
- Western Cobb: urban, metro Atlanta, housing, living wage

These community testimonies make it clear that the changes to CD 6 and CD 14 lack justification by community-of-interest reasoning, in addition to the shortfalls in other traditional districting principles detailed above.

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- [1] Amariah Becker, Moon Duchin, Dara Gold, and Sam Hirsch, *Computational Redistricting and the Voting Rights Act*. **Election Law Journal**, Volume 20, Number 4 (2021), 407–441.
- [2] Erin Chambers, Moon Duchin, Ranthony Edmonds, Parker Edwards, JN Matthews, Anthony Pizzimenti, Chanel Richardson, Parker Rule, and Ari Stern, *Aggregating Community Maps*. **ACM Conference on Advances in Geographic Information Systems (SIGSPATIAL)**, 2022.
- [3] Daryl DeFord, Moon Duchin, and Justin Solomon, *Recombination: A family of Markov chains for redistricting*. **Harvard Data Science Review**, Issue 3.1, Winter 2021.
- [4] Daryl DeFord, Moon Duchin, and Justin Solomon, *A computational approach to measuring vote elasticity and competitiveness*. **Statistics and Public Policy**. Vol 7, No. 1 (2020), 69–86.
- [5] Moon Duchin and Doug Spencer, *Models, Race, and the Law*. **Yale Law Journal Forum**, Volume 130 (March 2021), 744–797.
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## A Race, ethnicity, and citizenship

In this report, I have used the abbreviation BVAP to denote the share of voting age population that is Black alone or in combination, sometimes called "Any Part Black" (or APB). I have similarly used BHVAP for the share of VAP that is Black and/or Latino, which corresponds to the coalition of Black and Hispanic voters (sometimes called the "BH Coalition") identified in the Georgia NAACP complaint. WVAP refers to non-Hispanic single-race White population, and POCVAP is the broader designation for people of color, i.e., the complement of WVAP.

To be precise, I construct use two data columns directly from the Table P4 of the 2020 Decennial PL 94-171 block-level summary files and construct two more data columns as combinations. Hispanic voting age population ("HVAP") and non-Hispanic single-race White voting age population ("WVAP") are directly found in the P4. The combination columns are non-Hispanic (Any Part) Black VAP ("BVAP") and Other VAP, i.e., VAP not covered by any of these other categories ("OVAP"). By construction, these columns are exhaustive and non-overlapping: they sum to total VAP on each geographic unit.

- HVAP: P4\_002N
- WVAP: P4\_005N
- BVAP: P4\_006N, P4\_013N, P4\_018N, P4\_019N, P4\_020N, P4\_021N, P4\_029N, P4\_030N, P4\_031N, P4\_032N, P4\_039N, P4\_040N, P4\_041N, P4\_042N, P4\_043N, P4\_044N, P4\_050N, P4\_051N, P4\_052N, P4\_053N, P4\_054N, P4\_055N, P4\_060N, P4\_061N, P4\_062N, P4\_063N, P4\_066N, P4\_067N, P4\_068N, P4\_069N, P4\_071N, P4\_073N
- OVAP: P4\_007N, P4\_008N, P4\_009N, P4\_010N, P4\_014N, P4\_015N, P4\_016N, P4\_017N, P4\_022N, P4\_023N, P4\_024N, P4\_025N, P4\_026N, P4\_027N, P4\_033N, P4\_034N, P4\_035N, P4\_036N, P4\_037N, P4\_038N, P4\_045N, P4\_046N, P4\_047N, P4\_048N, P4\_056N, P4\_057N, P4\_058N, P4\_059N, P4\_064N, P4\_070N

To provide the best available estimate of 2020 citizen voting age population (CVAP) at the Census block level, I am using a method based combining 2020 Decennial block-level data and 2016–2020 American Community Survey (ACS) tract-level data. Any use of CVAP with block-based districting plans will require some process of estimation and disaggregation, since no ACS data product is released at that fine of a geographical resolution.

To estimate CVAP within each census block, I have applied a fractional ratio to each of these VAP columns using the citizenship rate pulled from the ACS data on the tract containing that block. Because the ACS race and ethnicity categories are different from the PL, computing this ratio requires the use of slightly different categories. All of this is done at the tract level.

- Black citizenship ratios are computed by dividing Black-alone VAP from Table B01001B by Black-alone CVAP from Table B05003B.
- Hispanic citizenship ratios are computed by dividing Hispanic VAP from Table B03002 by Black-alone CVAP from Table B05003I.
- White citizenship ratios are computed by dividing non-Hispanic White-alone VAP obtained from Table B01001H by non-Hispanic White-alone CVAP from Table B05003H.
- Citizenship ratios for the remaining ("Other") population are computed by dividing VAP from Tables B01001C (American Indian and Alaska Native alone), B01001D (Asian alone), B01001E (Native Hawaiian and Other Pacific Islander alone), B01001F (some other race alone), and B01001G (two or more races) by CVAP from Tables B05003C (American Indian and Alaska Native alone), B05003D (Asian alone), B05003E (Native Hawaiian and Other Pacific Islander alone), B05003F (some other race alone), and B05003G (two or more races).

**B Electoral alignment in enacted legislative districts**

<b>SD overall</b>	<b>James18P 0.4475</b>	<b>Thornton18P 0.4387</b>	<b>Thornton18R 0.5914</b>	<b>Robinson18P 0.6286</b>
1	0.4433	0.4957	0.7139	0.6752
2	0.5568	0.5374	0.7615	0.7245
3	0.4584	0.4566	0.6166	0.6647
4	0.4623	0.4170	0.6421	0.6800
5	0.4936	0.4604	0.6270	0.6329
6	0.2972	0.3624	0.4717	0.4602
7	0.3938	0.4327	0.5822	0.5709
8	0.5279	0.4223	0.6146	0.7182
9	0.4538	0.4486	0.6139	0.6232
10	0.5598	0.5108	0.6838	0.7221
11	0.5288	0.4219	0.5478	0.7098
12	0.5799	0.4771	0.6412	0.7634
13	0.5179	0.4354	0.6145	0.6956
14	0.3038	0.3703	0.4698	0.4570
15	0.5986	0.4502	0.5850	0.7338
16	0.4067	0.3965	0.5079	0.6065
17	0.4657	0.4581	0.6708	0.6715
18	0.4640	0.4891	0.6682	0.6932
19	0.5054	0.3997	0.6575	0.7214
20	0.4927	0.4921	0.6914	0.7050
21	0.2963	0.3435	0.5124	0.5157
22	0.5166	0.4377	0.6833	0.8227
23	0.4968	0.4249	0.6008	0.7456
24	0.4130	0.4463	0.7078	0.6693
25	0.4637	0.4260	0.6856	0.6932
26	0.4774	0.4439	0.6412	0.7312
27	0.2496	0.3162	0.4106	0.4904
28	0.4009	0.4143	0.4920	0.6198
29	0.4688	0.4364	0.5429	0.6639
30	0.3894	0.4034	0.4942	0.5762
31	0.4240	0.4460	0.5191	0.6237
32	0.3194	0.3952	0.5222	0.5230
33	0.5027	0.5156	0.6489	0.6470
34	0.5442	0.4912	0.6096	0.7214
35	0.6049	0.5417	0.7203	0.7344
36	0.3695	0.4134	0.5483	0.5050
37	0.3844	0.4495	0.5609	0.5796
38	0.5098	0.5168	0.7062	0.6948
39	0.4440	0.4444	0.6169	0.6187
40	0.2682	0.3327	0.4241	0.4099
41	0.4428	0.4385	0.5589	0.5968
42	0.2535	0.3351	0.4253	0.3403
43	0.5653	0.5018	0.6758	0.7202
44	0.5251	0.4527	0.5758	0.6902
45	0.4180	0.4387	0.6042	0.6031
46	0.3485	0.3946	0.5390	0.4958
47	0.3936	0.4419	0.6317	0.5378
48	0.3193	0.3488	0.5000	0.5144
49	0.2888	0.3402	0.4099	0.5269
50	0.2810	0.3220	0.4726	0.5497
51	0.2086	0.2667	0.3339	0.4437
52	0.3299	0.3271	0.4704	0.5792
53	0.3509	0.2385	0.3498	0.5729
54	0.3703	0.2679	0.3982	0.5208
55	0.5590	0.5016	0.6908	0.6938
56	0.2273	0.3277	0.4283	0.4432

Table 44: Vote shares for the minority candidate of choice across enacted Senate districts, in probative primary and primary runoff elections.



<b>SD overall</b>	<b>Clinton16 0.4734</b>	<b>Abrams18 0.4930</b>	<b>Thornton18 0.4697</b>	<b>Biden20 0.5013</b>	<b>Blackman20 0.4848</b>	<b>Ossoff21 0.5061</b>	<b>Warnock21 0.5104</b>	<b>Abrams22 0.4620</b>
1	0.3977	0.4165	0.3963	0.4339	0.4099	0.4311	0.4331	0.3858
2	0.7278	0.7447	0.7248	0.7304	0.7221	0.7420	0.7434	0.7147
3	0.3229	0.3285	0.3163	0.3399	0.3273	0.3382	0.3379	0.2963
4	0.3117	0.3132	0.2988	0.3342	0.3181	0.3377	0.3379	0.2911
5	0.7486	0.7767	0.7503	0.7347	0.7395	0.7698	0.7727	0.7034
6	0.5632	0.5785	0.5153	0.6174	0.5559	0.5662	0.5799	0.5438
7	0.5212	0.5621	0.5250	0.5855	0.5618	0.5848	0.5909	0.5308
8	0.3339	0.3362	0.3253	0.3520	0.3407	0.3507	0.3507	0.3009
9	0.5277	0.5723	0.5426	0.6035	0.5873	0.6158	0.6215	0.5702
10	0.7684	0.8024	0.7852	0.7981	0.8013	0.8195	0.8220	0.8060
11	0.3484	0.3360	0.3236	0.3526	0.3418	0.3512	0.3511	0.3039
12	0.5805	0.5771	0.5618	0.5816	0.5746	0.5894	0.5903	0.5448
13	0.2836	0.2791	0.2623	0.2964	0.2821	0.3023	0.3036	0.2581
14	0.5421	0.5624	0.5077	0.6012	0.5528	0.5666	0.5763	0.5314
15	0.6650	0.6714	0.6544	0.6680	0.6621	0.6801	0.6822	0.6461
16	0.3199	0.3332	0.3126	0.3586	0.3371	0.3568	0.3615	0.3225
17	0.3337	0.3650	0.3507	0.3978	0.3870	0.4080	0.4110	0.3883
18	0.3656	0.3743	0.3608	0.3893	0.3766	0.3965	0.3990	0.3559
19	0.2458	0.2345	0.2314	0.2516	0.2459	0.2568	0.2574	0.2109
20	0.3251	0.3238	0.3122	0.3437	0.3311	0.3499	0.3523	0.3094
21	0.2865	0.3041	0.2721	0.3369	0.3009	0.3235	0.3316	0.2773
22	0.6911	0.7080	0.6884	0.7123	0.7013	0.7168	0.7189	0.6855
23	0.4069	0.4078	0.3962	0.4254	0.4125	0.4307	0.4322	0.3864
24	0.3010	0.2990	0.2907	0.3274	0.3034	0.3240	0.3249	0.2740
25	0.3816	0.3938	0.3806	0.4089	0.3982	0.4205	0.4234	0.3818
26	0.6410	0.6479	0.6326	0.6434	0.6399	0.6560	0.6585	0.6157
27	0.2306	0.2612	0.2360	0.3076	0.2768	0.2975	0.3039	0.2511
28	0.2846	0.2997	0.2817	0.3250	0.3060	0.3286	0.3331	0.2939
29	0.3501	0.3549	0.3378	0.3749	0.3569	0.3773	0.3798	0.3372
30	0.2961	0.3061	0.2948	0.3150	0.3076	0.3274	0.3314	0.2807
31	0.2768	0.3101	0.3029	0.3328	0.3244	0.3459	0.3490	0.3132
32	0.3634	0.4061	0.3744	0.4355	0.4082	0.4287	0.4363	0.3836
33	0.6767	0.7146	0.6898	0.7124	0.7092	0.7252	0.7293	0.6895
34	0.8201	0.8472	0.8304	0.8271	0.8331	0.8498	0.8518	0.8280
35	0.7785	0.8159	0.7983	0.8186	0.8210	0.8382	0.8411	0.8255
36	0.9069	0.9164	0.8686	0.8962	0.8771	0.8925	0.8996	0.8846
37	0.3742	0.4120	0.3838	0.4453	0.4177	0.4387	0.4462	0.4002
38	0.8220	0.8415	0.8121	0.8282	0.8156	0.8320	0.8379	0.8082
39	0.8862	0.8936	0.8506	0.8816	0.8621	0.8753	0.8824	0.8574
40	0.5980	0.6152	0.5592	0.6483	0.5997	0.6141	0.6255	0.5808
41	0.8169	0.8319	0.8047	0.8254	0.8228	0.8350	0.8393	0.8062
42	0.8317	0.8430	0.7839	0.8482	0.8179	0.8295	0.8377	0.8234
43	0.6835	0.7249	0.7088	0.7349	0.7364	0.7558	0.7580	0.7420
44	0.8673	0.8878	0.8682	0.8702	0.8751	0.8906	0.8928	0.8748
45	0.3367	0.3775	0.3525	0.4139	0.3932	0.4170	0.4229	0.3773
46	0.3751	0.3889	0.3666	0.4078	0.3816	0.4034	0.4088	0.3555
47	0.3959	0.4052	0.3904	0.4072	0.3912	0.4156	0.4199	0.3668
48	0.4010	0.4363	0.3920	0.4836	0.4411	0.4685	0.4762	0.4131
49	0.2335	0.2530	0.2350	0.2763	0.2523	0.2718	0.2773	0.2211
50	0.1716	0.1672	0.1626	0.1855	0.1710	0.1867	0.1898	0.1443
51	0.1568	0.1558	0.1503	0.1751	0.1617	0.1759	0.1790	0.1420
52	0.2450	0.2550	0.2437	0.2659	0.2519	0.2723	0.2767	0.2241
53	0.1837	0.1858	0.1826	0.2012	0.1916	0.2054	0.2045	0.1628
54	0.2193	0.2168	0.2098	0.2346	0.2247	0.2371	0.2374	0.1745
55	0.7579	0.7925	0.7743	0.7945	0.7936	0.8113	0.8143	0.7873
56	0.3639	0.3944	0.3503	0.4373	0.3894	0.4108	0.4210	0.3738

Table 45: Vote shares for the minority candidate of choice across enacted Senate districts, in probative general and general runoff elections.

SD	Primaries out of 4	Generals out of 8	Effective?
1	3	0	N
2	4	8	Y
3	3	0	N
4	3	0	N
5	3	8	Y
6	0	8	N
7	3	8	Y
8	4	0	N
9	3	8	Y
10	4	8	Y
11	4	0	N
12	4	8	Y
13	4	0	N
14	0	8	N
15	4	8	Y
16	3	0	N
17	3	0	N
18	3	0	N
19	4	0	N
20	3	0	N
21	2	0	N
22	4	8	Y
23	3	0	N
24	3	0	N
25	3	0	N
26	3	8	Y
27	0	0	N
28	2	0	N
29	3	0	N
30	2	0	N
31	3	0	N
32	3	0	N
33	4	8	Y
34	4	8	Y
35	4	8	Y
36	3	8	Y
37	3	0	N
38	4	8	Y
39	3	8	Y
40	0	8	N
41	3	8	Y
42	0	8	N
43	4	8	Y
44	4	8	Y
45	3	0	N
46	1	0	N
47	3	0	N
48	1	0	N
49	1	0	N
50	1	0	N
51	0	0	N
52	1	0	N
53	1	0	N
54	1	0	N
55	4	8	Y
56	0	0	N

Table 46: By the standard of requiring that the candidate of choice could win or advance in at least three out of four primaries and win or advance in at least five out of eight generals, the enacted plan has 19 districts that present an effective opportunity.

<b>HD overall</b>	<b>James18P 0.4475</b>	<b>Thornton18P 0.4387</b>	<b>Thornton18R 0.5914</b>	<b>Robinson18P 0.6286</b>
1	0.3468	0.2773	0.4029	0.5806
2	0.3558	0.2650	0.3670	0.5476
3	0.3294	0.2937	0.3945	0.5330
4	0.3601	0.2721	0.5187	0.5229
5	0.3824	0.2760	0.4076	0.5266
6	0.3668	0.2496	0.3206	0.5430
7	0.2157	0.2572	0.3352	0.4173
8	0.2022	0.2644	0.3595	0.4717
9	0.1832	0.2701	0.3345	0.4496
10	0.2252	0.3163	0.4472	0.5031
11	0.2662	0.2961	0.3401	0.4568
12	0.3671	0.1692	0.3117	0.6227
13	0.3179	0.3260	0.4630	0.5670
14	0.3256	0.3317	0.5040	0.5218
15	0.3293	0.3518	0.4445	0.5811
16	0.3558	0.3730	0.5240	0.6086
17	0.4020	0.4363	0.4991	0.6145
18	0.3103	0.3091	0.5047	0.5511
19	0.4618	0.4869	0.5659	0.6279
20	0.2834	0.3785	0.3855	0.5275
21	0.2883	0.3326	0.3384	0.5194
22	0.3529	0.4129	0.5129	0.5635
23	0.2889	0.3204	0.3621	0.5709
24	0.2767	0.3541	0.4194	0.5259
25	0.2764	0.2928	0.4603	0.4945
26	0.2398	0.2986	0.4209	0.4735
27	0.2327	0.3044	0.2517	0.5148
28	0.2492	0.3220	0.3758	0.4683
29	0.3352	0.3795	0.5442	0.5610
30	0.3077	0.3530	0.4525	0.4958
31	0.3087	0.3400	0.4837	0.5963
32	0.3446	0.3195	0.5192	0.6330
33	0.3395	0.4244	0.6565	0.5794
34	0.3583	0.4446	0.5187	0.5655
35	0.3881	0.4507	0.5930	0.5815
36	0.4031	0.4559	0.5856	0.5964
37	0.3663	0.4527	0.5860	0.5523
38	0.5367	0.5168	0.6730	0.6903
39	0.5356	0.5345	0.7106	0.6796
40	0.4201	0.4639	0.6151	0.5695
41	0.5164	0.5317	0.6492	0.6384
42	0.4493	0.4890	0.6054	0.5755
43	0.3315	0.4079	0.5049	0.5117
44	0.3052	0.3869	0.5337	0.5195
45	0.1732	0.3021	0.3752	0.3676
46	0.2382	0.3411	0.4515	0.4440
47	0.3159	0.3542	0.5339	0.5053
48	0.2947	0.3582	0.4743	0.4679
49	0.2675	0.3343	0.4887	0.4863
50	0.3267	0.3767	0.5004	0.5151
51	0.3394	0.3852	0.4882	0.4737
52	0.2679	0.3387	0.4328	0.4053
53	0.2273	0.3048	0.4342	0.3910
54	0.2550	0.3444	0.4524	0.4081
55	0.4218	0.4596	0.6718	0.6275
56	0.4356	0.4518	0.6229	0.6142
57	0.2056	0.3076	0.3972	0.2914
58	0.4452	0.4517	0.6291	0.6105
59	0.4683	0.4632	0.6531	0.6383
60	0.4578	0.4647	0.6671	0.6606

<b>HD overall</b>	<b>James18P 0.4475</b>	<b>Thornton18P 0.4387</b>	<b>Thornton18R 0.5914</b>	<b>Robinson18P 0.6286</b>
61	0.5937	0.5530	0.7215	0.7307
62	0.4559	0.4616	0.6297	0.6200
63	0.4227	0.4396	0.5712	0.6002
64	0.4859	0.4774	0.5232	0.6528
65	0.5996	0.5377	0.7249	0.7187
66	0.5615	0.5117	0.6402	0.7097
67	0.5783	0.5225	0.7261	0.7275
68	0.5142	0.5104	0.6439	0.6898
69	0.5196	0.5166	0.6831	0.7079
70	0.4308	0.4351	0.5046	0.6431
71	0.3445	0.4125	0.5560	0.5556
72	0.3181	0.3598	0.4040	0.5030
73	0.3412	0.3844	0.4659	0.5790
74	0.4855	0.4752	0.6443	0.6397
75	0.5667	0.4732	0.5439	0.7273
76	0.5726	0.4532	0.5774	0.7483
77	0.5372	0.4834	0.6259	0.7376
78	0.5592	0.4792	0.5407	0.7231
79	0.5561	0.4554	0.5713	0.7240
80	0.2507	0.3075	0.3904	0.4083
81	0.2273	0.3192	0.4007	0.3411
82	0.1811	0.2948	0.3296	0.2414
83	0.2499	0.3328	0.4322	0.4258
84	0.4411	0.4548	0.6076	0.5958
85	0.4561	0.4392	0.5883	0.6138
86	0.4939	0.4612	0.6058	0.6512
87	0.5020	0.4629	0.5948	0.6599
88	0.4783	0.4613	0.6055	0.6211
89	0.3875	0.4030	0.5645	0.4889
90	0.3812	0.3969	0.5629	0.5003
91	0.5621	0.5012	0.7033	0.7132
92	0.5777	0.5069	0.6954	0.7293
93	0.5503	0.5024	0.6621	0.7124
94	0.5467	0.4912	0.6849	0.6899
95	0.5813	0.5091	0.7039	0.7160
96	0.4407	0.4533	0.6048	0.5762
97	0.3851	0.4260	0.5636	0.5440
98	0.4638	0.4516	0.6475	0.5829
99	0.3827	0.4466	0.5993	0.5637
100	0.3268	0.3356	0.4947	0.5489
101	0.4195	0.4367	0.5873	0.6026
102	0.4902	0.4578	0.6445	0.6531
103	0.3989	0.4094	0.5857	0.5902
104	0.4202	0.4445	0.5931	0.6166
105	0.4694	0.4604	0.6632	0.6422
106	0.4768	0.4844	0.6458	0.6273
107	0.4858	0.4463	0.6147	0.6542
108	0.3738	0.4246	0.5554	0.5502
109	0.4988	0.4650	0.5979	0.6304
110	0.5429	0.5042	0.6857	0.7014
111	0.4343	0.4549	0.6179	0.6180
112	0.3802	0.3856	0.4628	0.6032
113	0.5592	0.4986	0.6538	0.7211
114	0.3566	0.3820	0.5553	0.6116
115	0.5470	0.5100	0.6995	0.7163
116	0.5613	0.5113	0.6805	0.7260
117	0.4806	0.4765	0.6946	0.6856
118	0.4420	0.3747	0.5819	0.6716
119	0.3654	0.3998	0.4785	0.5577
120	0.3310	0.3982	0.5499	0.5099

<b>HD overall</b>	<b>James18P 0.4475</b>	<b>Thornton18P 0.4387</b>	<b>Thornton18R 0.5914</b>	<b>Robinson18P 0.6286</b>
121	0.3056	0.3610	0.4634	0.4318
122	0.4470	0.4828	0.7316	0.5336
123	0.4482	0.4759	0.8210	0.6795
124	0.3929	0.3945	0.5134	0.6158
125	0.4979	0.4484	0.5532	0.7290
126	0.5713	0.4653	0.7136	0.8431
127	0.3885	0.4146	0.5601	0.6759
128	0.4836	0.3572	0.6819	0.7292
129	0.4788	0.4262	0.6829	0.7876
130	0.5291	0.4322	0.6676	0.8300
131	0.4561	0.4564	0.6071	0.6988
132	0.5114	0.4534	0.7072	0.8308
133	0.4708	0.4428	0.7327	0.7101
134	0.4537	0.3415	0.4744	0.6571
135	0.4414	0.3509	0.4942	0.6575
136	0.4119	0.4498	0.5770	0.6639
137	0.5831	0.4497	0.6210	0.7196
138	0.4087	0.4060	0.4642	0.6087
139	0.4801	0.3999	0.4545	0.6473
140	0.6020	0.4426	0.5277	0.7298
141	0.6424	0.4599	0.5801	0.7533
142	0.4658	0.4625	0.6520	0.7214
143	0.4642	0.4872	0.6748	0.7412
144	0.4126	0.4350	0.6166	0.6729
145	0.4565	0.5158	0.6740	0.7167
146	0.5166	0.5594	0.7649	0.6930
147	0.5096	0.5585	0.7068	0.6984
148	0.5185	0.4879	0.6815	0.6956
149	0.4570	0.3824	0.5110	0.6894
150	0.5420	0.5120	0.7376	0.7507
151	0.5465	0.4851	0.6725	0.7150
152	0.5542	0.4701	0.6164	0.7292
153	0.6069	0.4804	0.6392	0.7999
154	0.5679	0.4636	0.6112	0.7543
155	0.4790	0.4310	0.6517	0.6845
156	0.5283	0.4362	0.6620	0.7356
157	0.4885	0.3890	0.6939	0.7202
158	0.4889	0.3914	0.6253	0.7098
159	0.4596	0.3947	0.6056	0.6965
160	0.4117	0.3911	0.5455	0.6332
161	0.5543	0.5195	0.7135	0.7036
162	0.6043	0.5636	0.7874	0.7517
163	0.4945	0.5148	0.7413	0.6811
164	0.4995	0.5290	0.7585	0.6963
165	0.5689	0.5359	0.7661	0.7381
166	0.2755	0.4103	0.6313	0.5219
167	0.4840	0.4765	0.6980	0.7241
168	0.5505	0.5425	0.7834	0.7886
169	0.5063	0.3686	0.5592	0.6991
170	0.4510	0.4272	0.5020	0.6678
171	0.5049	0.4272	0.5864	0.7274
172	0.5519	0.4134	0.5872	0.6544
173	0.5511	0.4509	0.6016	0.7408
174	0.5238	0.3752	0.5566	0.6716
175	0.5392	0.3988	0.5253	0.7350
176	0.5464	0.4061	0.6065	0.7292
177	0.5448	0.4450	0.6370	0.7407
178	0.4627	0.4045	0.6920	0.6940
179	0.4151	0.4621	0.5945	0.6310
180	0.4609	0.4587	0.6255	0.6534

Table 47: Vote shares for the minority candidate of choice across enacted House districts, in probative primary and primary runoff elections.

HD overall	Clinton16 0.4734	Abrams18 0.4930	Thornton18 0.4697	Biden20 0.5013	Blackman20 0.4848	Ossoff21 0.5061	Warnock21 0.5104	Abrams22 0.4620
1	0.1933	0.1964	0.1938	0.2104	0.2009	0.2160	0.2146	0.1736
2	0.1696	0.1670	0.1635	0.1901	0.1768	0.1895	0.1876	0.1425
3	0.1908	0.2018	0.1943	0.2221	0.2099	0.2233	0.2222	0.1816
4	0.3589	0.3633	0.3440	0.3835	0.3672	0.3806	0.3808	0.2906
5	0.1716	0.1733	0.1685	0.1855	0.1785	0.1926	0.1950	0.1482
6	0.1564	0.1457	0.1481	0.1641	0.1586	0.1679	0.1671	0.1177
7	0.1661	0.1629	0.1575	0.1807	0.1687	0.1815	0.1850	0.1469
8	0.1659	0.1600	0.1576	0.1819	0.1701	0.1815	0.1840	0.1422
9	0.1473	0.1523	0.1457	0.1695	0.1522	0.1705	0.1732	0.1391
10	0.1672	0.1675	0.1588	0.1859	0.1688	0.1864	0.1913	0.1485
11	0.1461	0.1550	0.1446	0.1868	0.1694	0.1863	0.1912	0.1552
12	0.1978	0.1895	0.1887	0.1945	0.1906	0.2069	0.2083	0.1607
13	0.3298	0.3437	0.3215	0.3537	0.3310	0.3571	0.3629	0.3015
14	0.1708	0.1768	0.1703	0.1916	0.1809	0.1941	0.1984	0.1604
15	0.2542	0.2749	0.2634	0.2863	0.2749	0.2949	0.2993	0.2417
16	0.2016	0.2083	0.2047	0.2237	0.2152	0.2305	0.2332	0.1941
17	0.2784	0.3264	0.3170	0.3580	0.3498	0.3747	0.3780	0.3411
18	0.1598	0.1479	0.1441	0.1598	0.1563	0.1653	0.1678	0.1314
19	0.3142	0.3525	0.3443	0.3762	0.3661	0.3887	0.3918	0.3614
20	0.2608	0.2975	0.2696	0.3349	0.3055	0.3261	0.3332	0.2815
21	0.2096	0.2398	0.2148	0.2772	0.2455	0.2657	0.2720	0.2304
22	0.3498	0.4004	0.3760	0.4163	0.3967	0.4206	0.4264	0.3756
23	0.2017	0.2210	0.2039	0.2563	0.2340	0.2535	0.2591	0.2129
24	0.2901	0.3324	0.2988	0.3727	0.3386	0.3622	0.3678	0.2989
25	0.3541	0.3882	0.3448	0.4409	0.3962	0.4224	0.4298	0.3655
26	0.2422	0.2709	0.2435	0.3235	0.2896	0.3113	0.3189	0.2710
27	0.1564	0.1633	0.1496	0.1884	0.1667	0.1841	0.1893	0.1452
28	0.1767	0.1985	0.1815	0.2357	0.2110	0.2273	0.2329	0.1893
29	0.3920	0.4240	0.3990	0.4239	0.4015	0.4255	0.4307	0.3557
30	0.2252	0.2501	0.2331	0.2841	0.2603	0.2785	0.2838	0.2300
31	0.2004	0.2126	0.2029	0.2409	0.2226	0.2442	0.2488	0.1925
32	0.1592	0.1546	0.1529	0.1702	0.1564	0.1731	0.1750	0.1345
33	0.1991	0.1743	0.1765	0.1948	0.1799	0.1959	0.1953	0.1486
34	0.3454	0.3777	0.3462	0.4205	0.3864	0.4055	0.4157	0.3698
35	0.5063	0.5603	0.5316	0.5726	0.5567	0.5802	0.5855	0.5361
36	0.3216	0.3596	0.3321	0.4022	0.3696	0.3928	0.3994	0.3632
37	0.5623	0.5933	0.5531	0.6113	0.5847	0.5981	0.6078	0.5507
38	0.6765	0.7229	0.7053	0.7243	0.7253	0.7453	0.7473	0.7174
39	0.7614	0.7930	0.7682	0.7876	0.7846	0.7991	0.8049	0.7703
40	0.6071	0.6417	0.5949	0.6673	0.6238	0.6387	0.6495	0.6207
41	0.6887	0.7199	0.6951	0.7105	0.7106	0.7256	0.7296	0.6856
42	0.6871	0.7282	0.6885	0.7158	0.6889	0.7108	0.7182	0.6714
43	0.5624	0.5885	0.5483	0.6073	0.5730	0.5827	0.5927	0.5436
44	0.3820	0.4236	0.3907	0.4598	0.4305	0.4536	0.4613	0.4096
45	0.4039	0.4203	0.3637	0.4792	0.4134	0.4354	0.4477	0.3997
46	0.3774	0.4098	0.3682	0.4495	0.4039	0.4254	0.4351	0.3895
47	0.3868	0.4048	0.3595	0.4440	0.3963	0.4171	0.4276	0.3688
48	0.4381	0.4625	0.4120	0.5147	0.4624	0.4779	0.4885	0.4344
49	0.4092	0.4330	0.3806	0.4801	0.4246	0.4420	0.4538	0.4029
50	0.5185	0.5558	0.5026	0.5939	0.5521	0.5784	0.5861	0.5154
51	0.5509	0.5728	0.5274	0.6082	0.5683	0.5811	0.5899	0.5407
52	0.5759	0.5938	0.5291	0.6361	0.5801	0.5957	0.6081	0.5697
53	0.4972	0.4992	0.4281	0.5478	0.4745	0.4843	0.4998	0.4548
54	0.5540	0.5641	0.4946	0.6104	0.5455	0.5555	0.5673	0.5443
55	0.8132	0.8121	0.7562	0.8169	0.7764	0.7909	0.8021	0.7662
56	0.9113	0.9249	0.8807	0.8971	0.8775	0.8976	0.9038	0.8875
57	0.7942	0.8025	0.7157	0.8092	0.7539	0.7714	0.7843	0.7610
58	0.9398	0.9511	0.9154	0.9213	0.9117	0.9269	0.9321	0.9165
59	0.9503	0.9603	0.9291	0.9337	0.9292	0.9425	0.9466	0.9307
60	0.8139	0.8069	0.7617	0.8065	0.7758	0.7868	0.7968	0.7698

HD overall	Clinton16 0.4734	Abrams18 0.4930	Thornton18 0.4697	Biden20 0.5013	Blackman20 0.4848	Ossoff21 0.5061	Warnock21 0.5104	Abrams22 0.4620
61	0.8241	0.8575	0.8407	0.8504	0.8538	0.8683	0.8707	0.8555
62	0.9354	0.9434	0.9127	0.9254	0.9223	0.9341	0.9382	0.9188
63	0.9197	0.9279	0.8967	0.9085	0.9071	0.9182	0.9243	0.9017
64	0.3449	0.3899	0.3757	0.4259	0.4177	0.4440	0.4476	0.4247
65	0.6646	0.6994	0.6807	0.6976	0.6952	0.7127	0.7158	0.6883
66	0.6077	0.6610	0.6389	0.6899	0.6851	0.7115	0.7159	0.6952
67	0.6289	0.6633	0.6473	0.6617	0.6560	0.6770	0.6798	0.6488
68	0.5991	0.6305	0.6067	0.6502	0.6395	0.6468	0.6521	0.6215
69	0.7034	0.7388	0.7190	0.7409	0.7350	0.7550	0.7586	0.7380
70	0.3758	0.3878	0.3663	0.3830	0.3655	0.3904	0.3953	0.3484
71	0.3046	0.3209	0.3107	0.3286	0.3192	0.3466	0.3510	0.3045
72	0.2982	0.2866	0.2703	0.2858	0.2713	0.2873	0.2928	0.2350
73	0.2814	0.3012	0.2764	0.3612	0.3306	0.3509	0.3572	0.3125
74	0.3228	0.3558	0.3379	0.3842	0.3665	0.3878	0.3907	0.3604
75	0.8667	0.8906	0.8739	0.8644	0.8755	0.8929	0.8952	0.8733
76	0.8631	0.8796	0.8639	0.8499	0.8607	0.8808	0.8811	0.8610
77	0.9074	0.9236	0.9083	0.8944	0.9071	0.9221	0.9225	0.9037
78	0.7907	0.8215	0.8039	0.8163	0.8228	0.8375	0.8394	0.8223
79	0.8973	0.9123	0.8980	0.8806	0.8897	0.9056	0.9076	0.8831
80	0.5608	0.5777	0.5197	0.6162	0.5677	0.5827	0.5954	0.5473
81	0.6692	0.6877	0.6319	0.7157	0.6752	0.6884	0.6986	0.6678
82	0.7751	0.7927	0.7267	0.8052	0.7682	0.7819	0.7896	0.7828
83	0.6124	0.6329	0.5664	0.6586	0.5979	0.6178	0.6302	0.5951
84	0.9388	0.9450	0.9161	0.9332	0.9290	0.9364	0.9400	0.9210
85	0.9148	0.9267	0.9000	0.9007	0.9017	0.9161	0.9205	0.8964
86	0.9067	0.9202	0.9000	0.8970	0.9028	0.9143	0.9164	0.8891
87	0.8855	0.8969	0.8781	0.8808	0.8870	0.8973	0.9008	0.8691
88	0.8094	0.8265	0.8039	0.8184	0.8179	0.8302	0.8349	0.8024
89	0.9211	0.9255	0.8819	0.9191	0.9027	0.9116	0.9178	0.8978
90	0.9421	0.9516	0.9131	0.9405	0.9290	0.9385	0.9436	0.9290
91	0.7506	0.7869	0.7695	0.7855	0.7884	0.8036	0.8059	0.7915
92	0.6898	0.7382	0.7204	0.7609	0.7621	0.7773	0.7799	0.7717
93	0.7088	0.7398	0.7225	0.7465	0.7464	0.7659	0.7673	0.7439
94	0.7994	0.8186	0.8009	0.8198	0.8178	0.8312	0.8348	0.8076
95	0.7589	0.7961	0.7794	0.7942	0.7960	0.8103	0.8128	0.7867
96	0.6513	0.6831	0.6515	0.6687	0.6620	0.6836	0.6874	0.6247
97	0.6033	0.6323	0.5956	0.6397	0.6211	0.6376	0.6447	0.5854
98	0.7760	0.7949	0.7669	0.7465	0.7543	0.7825	0.7838	0.7174
99	0.4465	0.4861	0.4466	0.5278	0.4934	0.5205	0.5277	0.4671
100	0.3134	0.3485	0.3175	0.3988	0.3652	0.3912	0.3971	0.3392
101	0.4962	0.5465	0.5164	0.5636	0.5501	0.5769	0.5820	0.5249
102	0.5983	0.6426	0.6164	0.6569	0.6486	0.6771	0.6822	0.6240
103	0.3596	0.4033	0.3775	0.4331	0.4076	0.4308	0.4375	0.3809
104	0.2771	0.3149	0.2929	0.3617	0.3402	0.3650	0.3717	0.3332
105	0.4671	0.5206	0.4938	0.5442	0.5317	0.5602	0.5643	0.5130
106	0.4991	0.5508	0.5231	0.5940	0.5767	0.6043	0.6103	0.5715
107	0.6770	0.7132	0.6840	0.6943	0.6943	0.7215	0.7255	0.6621
108	0.4720	0.5095	0.4750	0.5523	0.5274	0.5540	0.5613	0.5046
109	0.7727	0.7966	0.7724	0.7461	0.7521	0.7864	0.7876	0.7234
110	0.5260	0.5994	0.5794	0.6408	0.6309	0.6597	0.6628	0.6410
111	0.2454	0.2958	0.2852	0.3471	0.3360	0.3544	0.3570	0.3372
112	0.2275	0.2296	0.2196	0.2397	0.2282	0.2442	0.2475	0.2099
113	0.6532	0.6987	0.6850	0.6957	0.6991	0.7251	0.7280	0.7106
114	0.2932	0.2988	0.2835	0.3142	0.2978	0.3200	0.3230	0.2860
115	0.5282	0.5709	0.5501	0.6104	0.6051	0.6234	0.6266	0.6147
116	0.6253	0.6895	0.6709	0.7015	0.7027	0.7221	0.7253	0.7196
117	0.3607	0.4204	0.4064	0.4769	0.4683	0.4937	0.4975	0.4951
118	0.2642	0.2664	0.2585	0.2726	0.2618	0.2850	0.2880	0.2507
119	0.2336	0.2457	0.2336	0.2721	0.2574	0.2797	0.2837	0.2422
120	0.4324	0.4353	0.4134	0.4490	0.4169	0.4440	0.4503	0.3964



<b>HD overall</b>	<b>Clinton16 0.4734</b>	<b>Abrams18 0.4930</b>	<b>Thornton18 0.4697</b>	<b>Biden20 0.5013</b>	<b>Blackman20 0.4848</b>	<b>Ossoff21 0.5061</b>	<b>Warnock21 0.5104</b>	<b>Abrams22 0.4620</b>
121	0.4383	0.4382	0.4077	0.4598	0.4194	0.4425	0.4503	0.3852
122	0.7829	0.7982	0.7689	0.7877	0.7720	0.7958	0.8010	0.7655
123	0.3145	0.3023	0.3153	0.3195	0.3085	0.3193	0.3201	0.2736
124	0.3911	0.3841	0.3675	0.3980	0.3772	0.3936	0.3977	0.3395
125	0.3124	0.3380	0.3252	0.3750	0.3549	0.3784	0.3799	0.3423
126	0.6195	0.6212	0.6115	0.6197	0.6170	0.6298	0.6306	0.5894
127	0.3225	0.3389	0.3158	0.3749	0.3415	0.3649	0.3670	0.3174
128	0.5105	0.4989	0.4858	0.5025	0.4954	0.5098	0.5121	0.4545
129	0.6726	0.6733	0.6496	0.6856	0.6669	0.6835	0.6858	0.6342
130	0.6627	0.6813	0.6665	0.6839	0.6797	0.6947	0.6961	0.6730
131	0.2932	0.3217	0.2997	0.3670	0.3357	0.3639	0.3641	0.3232
132	0.6975	0.7065	0.6918	0.7024	0.6986	0.7175	0.7190	0.6724
133	0.4584	0.4527	0.4383	0.4561	0.4454	0.4705	0.4721	0.4204
134	0.3675	0.3622	0.3475	0.3672	0.3605	0.3794	0.3828	0.3402
135	0.2684	0.2653	0.2567	0.2640	0.2550	0.2713	0.2743	0.2254
136	0.3509	0.3549	0.3395	0.3499	0.3372	0.3571	0.3602	0.3056
137	0.5805	0.5883	0.5698	0.5897	0.5831	0.5999	0.6011	0.5656
138	0.2761	0.2729	0.2548	0.2985	0.2726	0.2949	0.2984	0.2546
139	0.3343	0.3473	0.3308	0.3915	0.3689	0.3872	0.3890	0.3475
140	0.7512	0.7692	0.7519	0.7471	0.7411	0.7654	0.7690	0.7451
141	0.7217	0.7419	0.7220	0.7370	0.7310	0.7494	0.7512	0.7280
142	0.6564	0.6705	0.6484	0.6687	0.6552	0.6724	0.6763	0.6316
143	0.7177	0.7223	0.7033	0.7099	0.7054	0.7228	0.7259	0.6915
144	0.3572	0.3620	0.3428	0.3923	0.3715	0.3905	0.3925	0.3457
145	0.4030	0.4083	0.3992	0.4182	0.4120	0.4290	0.4312	0.3886
146	0.3306	0.3558	0.3402	0.3840	0.3693	0.3930	0.3953	0.3570
147	0.3990	0.4414	0.4271	0.4662	0.4544	0.4793	0.4812	0.4429
148	0.3283	0.3167	0.2980	0.3276	0.3106	0.3286	0.3313	0.2913
149	0.3423	0.3256	0.3176	0.3348	0.3292	0.3441	0.3469	0.2964
150	0.5595	0.5496	0.5339	0.5455	0.5386	0.5543	0.5562	0.5107
151	0.4838	0.4720	0.4577	0.4809	0.4740	0.4877	0.4887	0.4452
152	0.2738	0.2855	0.2758	0.3017	0.2909	0.3123	0.3129	0.2793
153	0.6728	0.6798	0.6597	0.6825	0.6741	0.6887	0.6899	0.6593
154	0.5464	0.5383	0.5280	0.5377	0.5321	0.5504	0.5500	0.4931
155	0.3457	0.3279	0.3206	0.3489	0.3391	0.3541	0.3561	0.3130
156	0.2945	0.2829	0.2767	0.2976	0.2881	0.3012	0.3035	0.2486
157	0.2481	0.2370	0.2320	0.2511	0.2443	0.2572	0.2571	0.2076
158	0.3531	0.3412	0.3271	0.3492	0.3342	0.3512	0.3518	0.3047
159	0.3003	0.2928	0.2800	0.3045	0.2930	0.3104	0.3109	0.2651
160	0.3265	0.3052	0.2884	0.3178	0.2973	0.3121	0.3135	0.2560
161	0.3246	0.3679	0.3595	0.4068	0.3958	0.4200	0.4201	0.3897
162	0.6504	0.6870	0.6742	0.6721	0.6678	0.6893	0.6901	0.6576
163	0.7214	0.7313	0.7059	0.7266	0.7115	0.7291	0.7314	0.7008
164	0.3635	0.4190	0.4034	0.4286	0.4113	0.4347	0.4347	0.4062
165	0.7896	0.7899	0.7685	0.7803	0.7735	0.7851	0.7863	0.7540
166	0.3116	0.3135	0.2834	0.3470	0.3045	0.3300	0.3332	0.2844
167	0.3045	0.3125	0.3004	0.3268	0.3189	0.3377	0.3379	0.3008
168	0.6098	0.6350	0.6245	0.6225	0.6212	0.6460	0.6479	0.6024
169	0.2743	0.2641	0.2464	0.2767	0.2666	0.2806	0.2818	0.2370
170	0.2733	0.2610	0.2441	0.2846	0.2676	0.2881	0.2895	0.2362
171	0.3926	0.3819	0.3710	0.3957	0.3904	0.3953	0.3957	0.3469
172	0.2734	0.2564	0.2462	0.2732	0.2611	0.2760	0.2768	0.2273
173	0.4058	0.4008	0.3840	0.4191	0.4031	0.4133	0.4130	0.3706
174	0.2137	0.1984	0.1977	0.2076	0.2026	0.2085	0.2081	0.1994
175	0.3533	0.3524	0.3397	0.3565	0.3446	0.3541	0.3540	0.3100
176	0.2848	0.2806	0.2734	0.2866	0.2793	0.2936	0.2944	0.2505
177	0.5211	0.5375	0.5169	0.5718	0.5553	0.5697	0.5701	0.4892
178	0.1589	0.1447	0.1453	0.1585	0.1527	0.1624	0.1611	0.1272
179	0.3945	0.3937	0.3756	0.4203	0.4002	0.4030	0.4039	0.3524
180	0.3210	0.3373	0.3262	0.3423	0.3286	0.3438	0.3420	0.2955

Table 48: Vote shares for the minority candidate of choice across enacted House districts, in probative general and general runoff elections.



HD	Pri (4)	Gen (8)	Eff?
1	1	0	N
2	1	0	N
3	1	0	N
4	2	0	N
5	1	0	N
6	1	0	N
7	0	0	N
8	0	0	N
9	0	0	N
10	1	0	N
11	0	0	N
12	1	0	N
13	1	0	N
14	2	0	N
15	2	0	N
16	3	0	N
17	2	0	N
18	2	0	N
19	3	0	N
20	1	0	N
21	1	0	N
22	3	0	N
23	1	0	N
24	1	0	N
25	0	0	N
26	0	0	N
27	1	0	N
28	0	0	N
29	2	0	N
30	0	0	N
31	1	0	N
32	2	0	N
33	3	0	N
34	3	0	N
35	3	8	Y
36	3	0	N
37	3	8	Y
38	4	8	Y
39	4	8	Y
40	3	8	Y
41	4	8	Y
42	3	8	Y
43	3	8	Y
44	2	0	N
45	0	0	N
46	0	0	N
47	2	0	N
48	0	1	N
49	0	0	N
50	2	8	N
51	0	8	N
52	0	8	N
53	0	1	N
54	0	7	N
55	3	8	Y
56	3	8	Y
57	0	8	N
58	3	8	Y
59	3	8	Y
60	3	8	Y

HD	Pri (4)	Gen (8)	Eff?
61	4	8	Y
62	3	8	Y
63	3	8	Y
64	3	0	N
65	4	8	Y
66	4	8	Y
67	4	8	Y
68	4	8	Y
69	4	8	Y
70	3	0	N
71	3	0	N
72	1	0	N
73	2	0	N
74	3	0	N
75	4	8	Y
76	4	8	Y
77	4	8	Y
78	4	8	Y
79	4	8	Y
80	0	8	N
81	0	8	N
82	0	8	N
83	0	8	N
84	3	8	Y
85	3	8	Y
86	3	8	Y
87	4	8	Y
88	3	8	Y
89	2	8	N
90	2	8	N
91	4	8	Y
92	4	8	Y
93	4	8	Y
94	4	8	Y
95	4	8	Y
96	3	8	Y
97	3	8	Y
98	3	8	Y
99	3	3	N
100	1	0	N
101	3	7	Y
102	3	8	Y
103	3	0	N
104	3	0	N
105	3	6	Y
106	3	7	Y
107	3	8	Y
108	3	6	Y
109	3	8	Y
110	4	8	Y
111	3	0	N
112	1	0	N
113	4	8	Y
114	3	0	N
115	4	8	Y
116	4	8	Y
117	3	0	N
118	3	0	N
119	2	0	N
120	2	0	N

HD	Pri (4)	Gen (8)	Eff?
121	0	0	N
122	3	8	Y
123	3	0	N
124	2	0	N
125	3	0	N
126	4	8	Y
127	3	0	N
128	2	4	N
129	3	8	Y
130	4	8	Y
131	3	0	N
132	4	8	Y
133	3	0	N
134	1	0	N
135	1	0	N
136	3	0	N
137	4	8	Y
138	2	0	N
139	2	0	N
140	4	8	Y
141	4	8	Y
142	3	8	Y
143	3	8	Y
144	3	0	N
145	3	0	N
146	4	0	N
147	4	0	N
148	4	0	N
149	2	0	N
150	4	8	Y
151	4	0	N
152	4	0	N
153	4	8	Y
154	4	7	Y
155	3	0	N
156	4	0	N
157	3	0	N
158	2	0	N
159	2	0	N
160	2	0	N
161	4	0	N
162	4	8	Y
163	3	8	Y
164	3	0	N
165	4	8	Y
166	3	0	N
167	3	0	N
168	4	8	Y
169	3	0	N
170	3	0	N
171	4	0	N
172	4	0	N
173	4	0	N
174	3	0	N
175	4	0	N
176	4	0	N
177	4	7	Y
178	3	0	N
179	3	0	N
180	3	0	N

Table 49: Of 180 enacted House districts, 69 are rated as providing an effective opportunity to elect coalition candidates of choice.

	CD Alt			
<b>CD</b>	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	30.3%	37.2%	3	0
2	47.7%	52.4%	4	8
3	51.2%	58.4%	4	8
4	50.6%	58.8%	3	8
5	50.1%	61.5%	3	8
6	13.7%	24.6%	0	3
7	34.3%	56.7%	3	8
8	27.3%	34.2%	4	0
9	4.6%	16.1%	0	0
10	17.6%	24.5%	3	0
11	17.6%	25.2%	2	0
12	39.2%	43.8%	3	0
13	52.0%	58.8%	4	8
14	7.6%	18.6%	1	0

Table 50: CD Alt effectiveness.

SD	SD Alt Eff 1			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	25.1%	32.6%	3	0
2	46.9%	54.4%	4	8
3	21.2%	27.4%	3	0
4	23.5%	29.0%	3	0
5	20.3%	54.9%	3	8
6	50.1%	56.2%	3	8
7	17.1%	31.4%	3	3
8	30.4%	36.6%	4	0
9	29.3%	56.3%	3	8
10	59.5%	70.5%	4	8
11	31.0%	38.6%	4	0
12	58.0%	61.5%	4	8
13	27.0%	33.0%	4	0
14	18.1%	29.5%	0	8
15	54.0%	60.6%	4	8
16	50.2%	56.4%	4	8
17	51.1%	57.7%	4	8
18	30.4%	34.9%	3	0
19	25.7%	34.1%	4	0
20	34.4%	39.5%	3	0
21	7.5%	16.3%	2	0
22	50.5%	54.3%	4	8
23	23.0%	28.6%	3	0
24	25.0%	28.5%	3	0
25	50.0%	54.0%	3	8
26	50.1%	53.8%	4	8
27	4.7%	14.9%	0	0
28	50.6%	57.4%	4	8
29	26.9%	31.4%	3	0
30	14.3%	19.4%	1	0
31	19.7%	26.9%	3	0
32	14.9%	25.4%	3	0
33	50.4%	68.5%	4	8
34	72.2%	83.8%	4	8
35	50.9%	58.9%	4	8
36	50.0%	55.7%	1	8
37	19.3%	28.0%	3	0
38	27.9%	43.3%	3	8
39	51.2%	56.6%	4	8
40	50.1%	67.8%	3	8
41	57.3%	67.3%	3	8
42	35.8%	45.4%	0	8
43	52.0%	59.0%	4	8
44	61.6%	65.2%	3	8
45	19.8%	31.9%	3	0
46	16.5%	21.5%	2	0
47	16.7%	25.4%	3	0
48	10.1%	16.5%	0	1
49	8.1%	32.7%	1	0
50	5.4%	11.5%	1	0
51	1.2%	5.5%	0	0
52	13.0%	21.2%	1	0
53	5.1%	8.3%	1	0
54	3.8%	26.4%	1	0
55	50.0%	63.9%	4	8
56	7.6%	15.3%	0	0

Table 51: Effectiveness in SD Alt Eff 1, which includes the Alt 1 Gingles maps.

SD	SD Alt Eff 2			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	25.1%	32.6%	3	0
2	46.9%	54.4%	4	8
3	21.2%	27.4%	3	0
4	23.4%	28.9%	3	0
5	29.9%	71.6%	3	8
6	23.9%	32.1%	0	8
7	21.4%	38.0%	3	8
8	30.4%	36.6%	4	0
9	29.5%	48.3%	3	8
10	71.5%	76.7%	4	8
11	31.0%	38.6%	4	0
12	58.0%	61.5%	4	8
13	27.0%	33.0%	4	0
14	19.0%	31.1%	0	8
15	54.0%	60.6%	4	8
16	22.7%	27.7%	3	0
17	32.0%	37.1%	3	0
18	30.4%	34.9%	3	0
19	25.7%	34.1%	4	0
20	31.3%	34.8%	3	0
21	7.5%	16.3%	2	0
22	56.5%	61.8%	4	8
23	35.5%	40.0%	3	0
24	19.9%	24.3%	3	0
25	33.5%	37.2%	3	0
26	57.0%	61.2%	3	8
27	5.0%	15.2%	0	0
28	19.5%	25.9%	2	0
29	26.9%	31.4%	3	0
30	20.9%	27.0%	2	0
31	20.7%	28.1%	3	0
32	14.9%	25.4%	3	0
33	43.0%	65.9%	4	8
34	69.5%	82.2%	4	8
35	71.9%	79.4%	4	8
36	51.3%	58.4%	3	8
37	19.3%	28.0%	3	0
38	65.3%	73.7%	4	8
39	60.7%	66.3%	3	8
40	19.2%	40.8%	0	8
41	62.6%	69.3%	3	8
42	30.8%	39.4%	0	8
43	64.3%	71.2%	4	8
44	71.3%	79.9%	4	8
45	18.6%	31.7%	3	0
46	16.9%	23.9%	1	0
47	17.4%	27.0%	3	0
48	9.5%	16.5%	1	0
49	8.0%	29.9%	1	0
50	5.6%	14.4%	1	0
51	1.2%	5.5%	0	0
52	13.0%	21.2%	1	0
53	5.1%	8.3%	1	0
54	3.8%	26.4%	1	0
55	66.0%	74.7%	4	8
56	7.6%	15.3%	0	0

Table 52: Effectiveness in SD Alt Eff 2, which includes the Alt 2 Gingles maps.

SD	HD Alt Eff 1 Part 1			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	4.2%	6.3%	1	0
2	3.2%	10.8%	1	0
3	3.4%	6.4%	1	0
4	5.4%	49.5%	2	0
5	4.6%	17.2%	1	0
6	1.5%	13.5%	1	0
7	0.6%	6.1%	0	0
8	1.4%	4.1%	0	0
9	1.6%	6.3%	0	0
10	3.7%	13.7%	1	0
11	1.8%	6.0%	0	0
12	9.7%	15.9%	1	0
13	19.2%	30.0%	1	0
14	6.8%	12.7%	2	0
15	14.2%	23.9%	2	0
16	11.7%	20.3%	3	0
17	23.0%	29.9%	2	0
18	8.0%	10.4%	2	0
19	24.1%	30.9%	3	0
20	9.3%	18.5%	1	0
21	5.1%	12.5%	1	0
22	15.1%	26.7%	3	0
23	6.5%	20.7%	1	0
24	7.0%	17.3%	1	0
25	5.9%	11.0%	0	0
26	4.0%	14.8%	0	0
27	3.7%	13.3%	1	0
28	3.9%	15.3%	0	0
29	13.6%	53.3%	2	0
30	8.1%	24.2%	0	0
31	7.6%	26.5%	1	0
32	8.0%	12.9%	2	0
33	11.2%	14.3%	3	0
34	15.7%	23.5%	3	0
35	28.4%	39.6%	3	8
36	17.0%	23.5%	3	0
37	28.2%	46.8%	3	8
38	54.2%	66.8%	4	8
39	55.3%	74.0%	4	8
40	33.0%	38.9%	3	8
41	39.4%	68.0%	4	8
42	33.7%	51.1%	3	8
43	26.5%	40.6%	3	8
44	12.0%	22.5%	2	0
45	5.3%	10.2%	0	0
46	8.1%	15.5%	0	0
47	10.7%	18.1%	2	0
48	11.8%	24.2%	0	1
49	8.4%	15.1%	0	0
50	12.4%	18.8%	2	8
51	23.7%	37.0%	0	8
52	16.0%	23.4%	0	8
53	14.5%	21.9%	0	1
54	15.5%	28.3%	0	7
55	55.4%	60.4%	3	8
56	45.5%	51.3%	3	8
57	18.1%	26.1%	0	8
58	63.0%	68.1%	3	8
59	70.1%	74.5%	3	8
60	63.9%	69.0%	3	8

SD	HD Alt Eff 1 Part 2			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
61	74.3%	81.9%	4	8
62	72.3%	79.1%	3	8
63	69.3%	78.6%	3	8
64	30.7%	38.1%	3	0
65	62.0%	66.5%	4	8
66	53.4%	62.9%	4	8
67	58.9%	66.7%	4	8
68	55.7%	62.0%	4	8
69	63.6%	69.0%	4	8
70	27.8%	35.8%	3	0
71	19.9%	26.1%	3	0
72	20.9%	27.8%	1	0
73	12.1%	19.1%	2	0
74	25.5%	31.1%	3	0
75	74.4%	85.7%	4	8
76	67.2%	80.4%	4	8
77	76.1%	88.3%	4	8
78	71.6%	80.5%	4	8
79	71.6%	87.6%	4	8
80	14.2%	37.3%	0	8
81	21.8%	42.7%	0	8
82	16.8%	23.6%	0	8
83	15.1%	43.6%	0	8
84	73.7%	76.7%	3	8
85	62.7%	68.6%	3	8
86	75.1%	79.4%	3	8
87	73.1%	79.8%	4	8
88	63.3%	73.3%	3	8
89	62.5%	65.9%	2	8
90	58.5%	62.8%	2	8
91	70.0%	75.9%	4	8
92	68.8%	73.5%	4	8
93	65.4%	75.0%	4	8
94	69.0%	76.3%	4	8
95	67.2%	75.1%	4	8
96	23.0%	59.0%	3	8
97	26.8%	46.0%	3	8
98	23.2%	76.0%	3	8
99	14.7%	23.4%	3	3
100	10.0%	20.0%	1	0
101	24.2%	42.4%	3	7
102	37.6%	58.9%	3	8
103	16.8%	33.7%	3	0
104	17.0%	28.1%	3	0
105	29.0%	45.8%	3	6
106	36.3%	47.4%	3	7
107	29.6%	60.7%	3	8
108	18.4%	36.6%	3	6
109	32.5%	68.6%	3	8
110	47.2%	57.7%	4	8
111	22.3%	31.1%	3	0
112	19.2%	22.5%	1	0
113	59.5%	66.2%	4	8
114	24.7%	28.4%	3	0
115	52.1%	59.1%	4	8
116	58.1%	65.4%	4	8
117	36.6%	42.0%	3	0
118	23.6%	27.3%	3	0
119	13.5%	23.9%	2	0
120	14.3%	21.4%	2	0

SD	HD Alt Eff 1 Part 3			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
121	9.6%	15.2%	0	0
122	28.4%	40.1%	3	8
123	24.3%	28.6%	3	0
124	25.6%	31.8%	2	0
125	23.7%	31.4%	3	0
126	54.5%	57.7%	4	8
127	18.5%	23.3%	3	0
128	50.4%	52.1%	2	4
129	54.9%	59.2%	3	8
130	59.9%	63.8%	4	8
131	17.6%	23.5%	3	0
132	52.3%	60.1%	4	8
133	36.8%	38.9%	3	0
134	33.6%	37.3%	1	0
135	23.8%	25.6%	1	0
136	28.7%	32.3%	3	0
137	52.1%	56.6%	4	8
138	19.3%	22.6%	2	0
139	20.3%	26.7%	2	0
140	57.6%	65.6%	4	8
141	57.5%	64.1%	4	8
142	59.5%	63.2%	3	8
143	60.8%	65.5%	3	8
144	29.3%	31.9%	3	0
145	35.7%	41.6%	3	0
146	27.6%	32.3%	4	0
147	30.1%	37.3%	4	0
148	34.0%	37.1%	4	0
149	32.1%	37.8%	2	0
150	53.6%	59.7%	4	8
151	42.4%	49.7%	4	0
152	26.1%	28.4%	4	0
153	67.9%	70.4%	4	8
154	54.8%	56.5%	4	7
155	35.9%	38.1%	3	0
156	30.3%	37.2%	4	0
157	24.7%	33.7%	3	0
158	31.2%	35.7%	2	0
159	24.5%	27.4%	2	0
160	22.6%	27.6%	2	0
161	27.1%	33.9%	4	0
162	43.7%	53.3%	4	8
163	45.5%	52.9%	3	8
164	23.5%	32.0%	3	0
165	50.3%	55.6%	4	8
166	5.7%	9.8%	3	0
167	22.3%	29.7%	3	0
168	46.3%	56.6%	4	8
169	29.0%	36.7%	3	0
170	24.2%	32.9%	3	0
171	39.6%	44.2%	4	0
172	23.3%	36.7%	4	0
173	36.3%	41.7%	4	0
174	17.4%	25.4%	3	0
175	24.2%	29.2%	4	0
176	22.7%	30.9%	4	0
177	53.9%	60.0%	4	7
178	14.8%	19.9%	3	0
179	27.0%	33.4%	3	0
180	18.2%	23.8%	3	0

Table 53: Effectiveness in HD Alt Eff 1, which includes the Alt 1 Gingles maps.

HD	HD Alt Eff 2 Part 1			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	4.2%	6.3%	1	0
2	3.2%	10.8%	1	0
3	3.4%	6.4%	1	0
4	5.4%	49.5%	2	0
5	4.6%	17.2%	1	0
6	1.5%	13.5%	1	0
7	0.6%	6.1%	0	0
8	1.4%	4.1%	0	0
9	1.6%	6.3%	0	0
10	3.7%	13.7%	1	0
11	1.8%	6.0%	0	0
12	9.7%	15.9%	1	0
13	19.2%	30.0%	1	0
14	6.8%	12.7%	2	0
15	14.2%	23.9%	2	0
16	11.7%	20.3%	3	0
17	23.0%	29.9%	2	0
18	8.0%	10.4%	2	0
19	24.1%	30.9%	3	0
20	9.3%	18.5%	1	0
21	5.1%	12.5%	1	0
22	15.1%	26.7%	3	0
23	6.5%	20.7%	1	0
24	7.0%	17.3%	1	0
25	5.9%	11.0%	0	0
26	4.0%	14.8%	0	0
27	3.7%	13.3%	1	0
28	3.9%	15.3%	0	0
29	13.6%	53.3%	2	0
30	8.1%	24.2%	0	0
31	7.6%	26.5%	1	0
32	8.0%	12.9%	2	0
33	11.2%	14.3%	3	0
34	15.7%	23.5%	3	0
35	28.4%	39.6%	3	8
36	17.0%	23.5%	3	0
37	28.2%	46.8%	3	8
38	54.2%	66.8%	4	8
39	55.3%	74.0%	4	8
40	33.0%	38.9%	3	8
41	39.4%	68.0%	4	8
42	33.7%	51.1%	3	8
43	26.5%	40.6%	3	8
44	12.0%	22.5%	2	0
45	5.3%	10.2%	0	0
46	8.1%	15.5%	0	0
47	10.7%	18.1%	2	0
48	11.8%	24.2%	0	1
49	8.4%	15.1%	0	0
50	12.4%	18.8%	2	8
51	23.7%	37.0%	0	8
52	16.0%	23.4%	0	8
53	14.5%	21.9%	0	1
54	15.5%	28.3%	0	7
55	55.4%	60.4%	3	8
56	45.5%	51.3%	3	8
57	18.1%	26.1%	0	8
58	63.0%	68.1%	3	8
59	70.1%	74.5%	3	8
60	63.9%	69.0%	3	8



HD	HD Alt Eff 2 Part 2			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
61	74.3%	81.9%	4	8
62	72.3%	79.1%	3	8
63	69.3%	78.6%	3	8
64	30.7%	38.1%	3	0
65	62.0%	66.5%	4	8
66	53.4%	62.9%	4	8
67	58.9%	66.7%	4	8
68	55.7%	62.0%	4	8
69	63.6%	69.0%	4	8
70	27.8%	35.8%	3	0
71	19.9%	26.1%	3	0
72	20.9%	27.8%	1	0
73	12.1%	19.1%	2	0
74	25.5%	31.1%	3	0
75	74.4%	85.7%	4	8
76	67.2%	80.4%	4	8
77	76.1%	88.3%	4	8
78	71.6%	80.5%	4	8
79	71.6%	87.6%	4	8
80	14.2%	37.3%	0	8
81	21.8%	42.7%	0	8
82	16.8%	23.6%	0	8
83	15.1%	43.6%	0	8
84	73.7%	76.7%	3	8
85	62.7%	68.6%	3	8
86	75.1%	79.4%	3	8
87	73.1%	79.8%	4	8
88	63.3%	73.3%	3	8
89	62.5%	65.9%	2	8
90	58.5%	62.8%	2	8
91	70.0%	75.9%	4	8
92	68.8%	73.5%	4	8
93	65.4%	75.0%	4	8
94	69.0%	76.3%	4	8
95	67.2%	75.1%	4	8
96	23.0%	59.0%	3	8
97	26.8%	46.0%	3	8
98	23.2%	76.0%	3	8
99	14.7%	23.4%	3	3
100	10.0%	20.0%	1	0
101	24.2%	42.4%	3	7
102	37.6%	58.9%	3	8
103	16.8%	33.7%	3	0
104	17.0%	28.1%	3	0
105	29.0%	45.8%	3	6
106	36.3%	47.4%	3	7
107	29.6%	60.7%	3	8
108	18.4%	36.6%	3	6
109	32.5%	68.6%	3	8
110	47.2%	57.7%	4	8
111	22.3%	31.1%	3	0
112	19.2%	22.5%	1	0
113	59.5%	66.2%	4	8
114	24.7%	28.4%	3	0
115	52.1%	59.1%	4	8
116	58.1%	65.4%	4	8
117	36.6%	42.0%	3	0
118	23.6%	27.3%	3	0
119	13.5%	23.9%	2	0
120	14.3%	21.4%	2	0

HD	HD Alt Eff 2 Part 3			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8
121	9.6%	15.2%	0	0
122	28.4%	40.1%	3	8
123	24.3%	28.6%	3	0
124	25.6%	31.8%	2	0
125	23.7%	31.4%	3	0
126	54.5%	57.7%	4	8
127	18.5%	23.3%	3	0
128	50.4%	52.1%	2	4
129	54.9%	59.2%	3	8
130	59.9%	63.8%	4	8
131	17.6%	23.5%	3	0
132	52.3%	60.1%	4	8
133	36.8%	38.9%	3	0
134	33.6%	37.3%	1	0
135	23.8%	25.6%	1	0
136	28.7%	32.3%	3	0
137	52.1%	56.6%	4	8
138	19.3%	22.6%	2	0
139	20.3%	26.7%	2	0
140	57.6%	65.6%	4	8
141	57.5%	64.1%	4	8
142	59.5%	63.2%	3	8
143	60.8%	65.5%	3	8
144	29.3%	31.9%	3	0
145	35.7%	41.6%	3	0
146	27.6%	32.3%	4	0
147	30.1%	37.3%	4	0
148	34.0%	37.1%	4	0
149	32.1%	37.8%	2	0
150	53.6%	59.7%	4	8
151	42.4%	49.7%	4	0
152	26.1%	28.4%	4	0
153	67.9%	70.4%	4	8
154	54.8%	56.5%	4	7
155	35.9%	38.1%	3	0
156	30.3%	37.2%	4	0
157	24.7%	33.7%	3	0
158	31.2%	35.7%	2	0
159	24.5%	27.4%	2	0
160	22.6%	27.6%	2	0
161	27.1%	33.9%	4	0
162	43.7%	53.3%	4	8
163	45.5%	52.9%	3	8
164	23.5%	32.0%	3	0
165	50.3%	55.6%	4	8
166	5.7%	9.8%	3	0
167	22.3%	29.7%	3	0
168	46.3%	56.6%	4	8
169	29.0%	36.7%	3	0
170	24.2%	32.9%	3	0
171	39.6%	44.2%	4	0
172	23.3%	36.7%	4	0
173	36.3%	41.7%	4	0
174	17.4%	25.4%	3	0
175	24.2%	29.2%	4	0
176	22.7%	30.9%	4	0
177	53.9%	60.0%	4	7
178	14.8%	19.9%	3	0
179	27.0%	33.4%	3	0
180	18.2%	23.8%	3	0

Table 54: Effectiveness in HD Alt Eff 2, which includes the Alt 2 Gingles maps.

## C Splits of geographical units

County	CD	TOTPOP	VAP	BVAP	BHVAP	Biden20	Abrams18
Bibb	2	108371	82489	0.6349	0.6710	0.7139	0.7250
Bibb	8	48975	38413	0.3098	0.3394	0.4596	0.4202
Cherokee	6	40881	31202	0.0304	0.0814	0.2172	0.1862
Cherokee	11	225739	171726	0.0817	0.1902	0.3233	0.2905
Clayton	5	37919	27885	0.7280	0.8649	0.8849	0.9200
Clayton	13	259676	192693	0.7190	0.8266	0.8548	0.8773
Cobb	6	165925	125728	0.1092	0.1848	0.4913	0.4476
Cobb	11	397281	313106	0.2654	0.3850	0.5535	0.5309
Cobb	13	125029	94104	0.4458	0.6271	0.7316	0.7310
Cobb	14	77914	58910	0.4646	0.5644	0.6421	0.6263
DeKalb	4	601451	465661	0.5316	0.6302	0.8171	0.8166
DeKalb	5	162931	129615	0.5145	0.5480	0.9148	0.9203
Douglas	3	42970	32601	0.2970	0.3719	0.4220	0.3803
Douglas	13	101267	75827	0.5762	0.6647	0.7230	0.7055
Effingham	1	47208	34272	0.1276	0.1756	0.2462	0.2167
Effingham	12	17561	13023	0.1887	0.2129	0.2608	0.2521
Fayette	3	102685	78539	0.2094	0.2720	0.4272	0.3914
Fayette	13	16509	13259	0.5492	0.6082	0.6394	0.6271
Fulton	5	564287	464015	0.4769	0.5379	0.8077	0.8108
Fulton	6	245494	190172	0.1574	0.2568	0.5433	0.5069
Fulton	7	92558	69229	0.1175	0.1777	0.5527	0.5060
Fulton	13	164371	123766	0.8829	0.9171	0.9291	0.9474
Gwinnett	6	34755	25061	0.1336	0.2645	0.4320	0.3889
Gwinnett	7	672579	497705	0.3234	0.5450	0.6487	0.6332
Gwinnett	9	249728	186718	0.2061	0.3433	0.5045	0.4697
Henry	3	23975	17964	0.4678	0.5259	0.5731	0.5484
Henry	10	118452	86869	0.4414	0.4948	0.5093	0.4413
Henry	13	98285	75140	0.5710	0.6324	0.7013	0.6898
Houston	2	48521	36233	0.4321	0.5075	0.5511	0.5393
Houston	8	115112	85885	0.2788	0.3276	0.3996	0.3741
Muscogee	2	175155	132158	0.5262	0.5851	0.6625	0.6625
Muscogee	3	31767	24894	0.1909	0.2578	0.3973	0.3371
Newton	4	70114	52306	0.6098	0.6644	0.7470	0.7502
Newton	10	42369	32442	0.2631	0.2960	0.3764	0.3546
Wilkes	10	1802	1491	0.3273	0.3628	0.3556	0.3607
Wilkes	12	7763	6160	0.4193	0.4481	0.4191	0.3810

Table 55: All county splits in the enacted Congressional map.

County	SD	TOTPOP	VAP	BVAP	BHVAP	Biden20	Abrams18
Bibb	18	53182	42225	0.3079	0.3413	0.4239	0.3967
Bibb	25	15513	12080	0.4120	0.4384	0.5678	0.5256
Bibb	26	88651	66597	0.6951	0.7309	0.7939	0.8072
Chatham	1	81408	65586	0.1486	0.2032	0.3982	0.3743
Chatham	2	190408	150843	0.4686	0.5368	0.7304	0.7447
Chatham	4	23475	18286	0.2596	0.3331	0.4748	0.4463
Clarke	46	52016	45312	0.1485	0.2062	0.6611	0.6499
Clarke	47	76655	61518	0.2933	0.4111	0.7355	0.7329
Cobb	6	92249	75423	0.2527	0.3229	0.5988	0.5665
Cobb	32	101467	80689	0.1946	0.2934	0.5310	0.5013
Cobb	33	192694	146415	0.4296	0.6488	0.7124	0.7146
Cobb	37	181541	138961	0.2018	0.2812	0.4547	0.4203
Cobb	38	108305	83807	0.4264	0.5438	0.7289	0.7235
Cobb	56	89893	66553	0.0706	0.1257	0.4685	0.4177
DeKalb	10	75906	58884	0.9500	0.9605	0.9600	0.9783
DeKalb	40	164997	127423	0.1719	0.3807	0.6490	0.6138
DeKalb	41	183560	139591	0.6449	0.7009	0.8404	0.8492
DeKalb	42	190940	153952	0.3078	0.3875	0.8487	0.8451
DeKalb	43	32212	24150	0.9135	0.9384	0.9394	0.9582
DeKalb	44	51049	40820	0.7415	0.7714	0.9490	0.9654
DeKalb	55	65718	50456	0.9248	0.9473	0.9511	0.9698
Douglas	28	25889	19664	0.2400	0.3042	0.3485	0.3050
Douglas	30	23454	17242	0.5045	0.5920	0.6386	0.6270
Douglas	35	94894	71522	0.5587	0.6479	0.7084	0.6871
Fayette	16	87134	66132	0.1605	0.2249	0.4142	0.3812
Fayette	34	32060	25666	0.5111	0.5670	0.6424	0.6262
Fulton	6	99152	80358	0.2261	0.3060	0.6333	0.5887
Fulton	14	192533	155340	0.1897	0.3044	0.6012	0.5624
Fulton	21	83538	62497	0.1058	0.1749	0.4711	0.4310
Fulton	28	6963	5456	0.4646	0.5403	0.6541	0.6506
Fulton	35	97945	73153	0.8757	0.9161	0.9293	0.9449
Fulton	36	192282	161385	0.5134	0.5749	0.8962	0.9164
Fulton	38	84850	64560	0.9472	0.9672	0.9589	0.9831
Fulton	39	191500	156022	0.6070	0.6549	0.8816	0.8935
Fulton	48	83219	61631	0.1140	0.1697	0.5609	0.5128
Fulton	56	34728	26780	0.0764	0.1341	0.4753	0.4280
Gwinnett	5	191921	139394	0.2994	0.7018	0.7503	0.7914
Gwinnett	7	189709	147425	0.2144	0.3714	0.5941	0.5728
Gwinnett	9	192915	142054	0.2953	0.4730	0.6008	0.5667
Gwinnett	40	25547	19577	0.3258	0.5294	0.6840	0.6640
Gwinnett	41	7463	5687	0.1662	0.2427	0.5323	0.4821
Gwinnett	45	151475	110999	0.2039	0.3351	0.4571	0.4167
Gwinnett	46	27298	19469	0.3273	0.4631	0.4781	0.4201
Gwinnett	48	46297	33367	0.1244	0.2355	0.4312	0.3849
Gwinnett	55	124437	91512	0.5135	0.6159	0.7078	0.6833
Hall	49	189355	144123	0.0796	0.2954	0.2832	0.2646
Hall	50	13781	9721	0.0637	0.5322	0.4380	0.4661
Houston	18	42875	32630	0.2983	0.3609	0.4437	0.4176
Houston	20	74275	54626	0.2606	0.3022	0.3680	0.3405
Houston	26	46483	34862	0.4485	0.5232	0.5831	0.5711
Muscogee	15	142205	107284	0.5931	0.6521	0.7443	0.7508
Muscogee	29	64717	49768	0.2144	0.2771	0.4287	0.3868
Newton	17	45536	34660	0.3080	0.3453	0.3845	0.3582
Newton	43	66947	50088	0.5941	0.6466	0.7456	0.7531
Richmond	22	193163	150450	0.5650	0.6105	0.6912	0.6838
Richmond	23	13444	10449	0.2795	0.3129	0.3975	0.3659

Table 56: Counties with more than 15 points BHVAP differential across Senate districts.

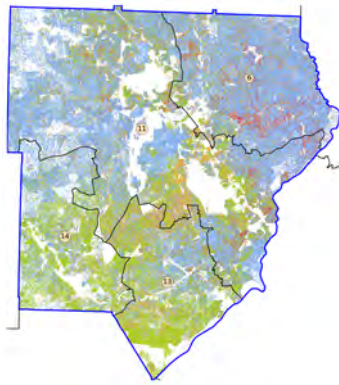
County	HD	TOTPOP	VAP	BVAP	BHVAP share	Biden20	Abrams18
Bibb	142	59608	44584	0.5952	0.6249	0.6687	0.6705
Bibb	143	59469	46390	0.6079	0.6501	0.7099	0.7223
Bibb	144	33948	26547	0.3263	0.3545	0.4642	0.4220
Bibb	145	4321	3381	0.2576	0.2828	0.3445	0.3323
Carroll	18	18789	14467	0.1147	0.1479	0.1918	0.1808
Carroll	70	2854	2259	0.0469	0.0668	0.1414	0.1308
Carroll	71	59538	44582	0.1992	0.2572	0.3247	0.3170
Carroll	72	37967	29688	0.2419	0.3312	0.3361	0.3285
Chatham	161	28269	21359	0.3988	0.4739	0.6095	0.6037
Chatham	162	60308	46733	0.4373	0.5246	0.6721	0.6870
Chatham	163	60123	48461	0.4549	0.5242	0.7266	0.7313
Chatham	164	38681	30732	0.2607	0.3401	0.4644	0.4676
Chatham	165	59978	48247	0.5033	0.5506	0.7803	0.7899
Chatham	166	47932	39183	0.0481	0.0851	0.3527	0.3205
Clarke	120	30095	25090	0.1937	0.2693	0.6432	0.6235
Clarke	121	26478	22991	0.1359	0.1979	0.7010	0.6934
Clarke	122	59632	48840	0.2842	0.3977	0.7990	0.8078
Clarke	124	12466	9909	0.2940	0.3941	0.7018	0.6980
Cobb	22	28586	22350	0.2048	0.2980	0.5020	0.4894
Cobb	34	59875	45758	0.1567	0.2306	0.4198	0.3770
Cobb	35	59889	48312	0.2840	0.3856	0.5726	0.5603
Cobb	36	59994	44911	0.1698	0.2300	0.4022	0.3596
Cobb	37	59176	46223	0.2818	0.4599	0.6113	0.5933
Cobb	38	59317	44839	0.5423	0.6568	0.7243	0.7229
Cobb	39	59381	44436	0.5529	0.7293	0.7876	0.7930
Cobb	40	59044	47976	0.3298	0.3798	0.6673	0.6417
Cobb	41	60122	45271	0.3935	0.6699	0.7105	0.7199
Cobb	42	59620	48525	0.3370	0.5014	0.7158	0.7282
Cobb	43	59464	47033	0.2653	0.3973	0.6073	0.5885
Cobb	44	38013	29631	0.1281	0.2176	0.4855	0.4445
Cobb	45	59738	44023	0.0528	0.0988	0.4788	0.4200
Cobb	46	43930	32560	0.0782	0.1348	0.4656	0.4206
Coweta	65	13008	9714	0.1225	0.1650	0.3213	0.2874
Coweta	67	17272	13061	0.0763	0.1352	0.2416	0.2057
Coweta	70	56267	42990	0.2904	0.3678	0.4376	0.5036
Coweta	73	31608	24269	0.1336	0.2015	0.4070	0.3136
Coweta	136	28003	21121	0.1081	0.1469	0.2325	0.2141
DeKalb	52	28300	21991	0.1398	0.1987	0.6358	0.5815
DeKalb	80	59461	44784	0.1418	0.3654	0.6100	0.5681
DeKalb	81	59007	46259	0.2183	0.4191	0.7180	0.6918
DeKalb	82	59724	50238	0.1683	0.2309	0.8035	0.7923
DeKalb	83	59416	46581	0.1512	0.4284	0.6572	0.6316
DeKalb	84	59862	47350	0.7366	0.7561	0.9324	0.9440
DeKalb	85	59373	46308	0.6271	0.6765	0.8981	0.9246
DeKalb	86	59205	44614	0.7505	0.7832	0.8931	0.9160
DeKalb	87	59709	45615	0.7308	0.7866	0.8798	0.8936
DeKalb	88	47844	37310	0.7117	0.7652	0.8359	0.8377
DeKalb	89	59866	46198	0.6254	0.6519	0.9214	0.9284
DeKalb	90	59812	48015	0.5849	0.6205	0.9401	0.9508
DeKalb	91	19700	14941	0.9586	0.9683	0.9581	0.9793
DeKalb	92	15607	11794	0.9309	0.9453	0.9403	0.9581
DeKalb	93	11690	8476	0.9040	0.9412	0.9411	0.9598
DeKalb	94	31207	23817	0.9289	0.9513	0.9523	0.9703
DeKalb	95	14599	10985	0.8971	0.9250	0.9413	0.9607
Dougherty	151	6268	4791	0.5917	0.6022	0.6466	0.6213
Dougherty	152	6187	4906	0.4855	0.5298	0.5372	0.5517
Dougherty	153	59299	45692	0.6795	0.7010	0.7454	0.7566
Dougherty	154	14036	10877	0.8612	0.8694	0.8896	0.9081

County	HD	TOTPOP	VAP	BVAP	BHVAP share	Biden20	Abrams18
Douglas	61	30206	23160	0.5396	0.6574	0.6995	0.6949
Douglas	64	35576	26860	0.2958	0.3662	0.4137	0.3741
Douglas	65	19408	14130	0.6572	0.7146	0.7568	0.7413
Douglas	66	59047	44278	0.5341	0.6181	0.6899	0.6610
Fayette	68	29719	22798	0.2259	0.3098	0.4218	0.3753
Fayette	69	37303	29554	0.4700	0.5270	0.5903	0.5574
Fayette	73	28428	21467	0.1070	0.1718	0.3793	0.3349
Fayette	74	23744	17979	0.1329	0.1724	0.3872	0.3373
Floyd	5	5099	4048	0.0336	0.0684	0.1566	0.1349
Floyd	12	34335	27071	0.0836	0.1607	0.2351	0.2152
Floyd	13	59150	45176	0.1918	0.2979	0.3687	0.3564
Fulton	25	13280	9828	0.1043	0.1651	0.5348	0.4723
Fulton	47	55235	40829	0.1130	0.1834	0.4647	0.4241
Fulton	48	43976	33385	0.1231	0.2615	0.5322	0.4840
Fulton	49	59153	45263	0.0842	0.1480	0.4815	0.4342
Fulton	50	59523	43940	0.1240	0.1826	0.5939	0.5558
Fulton	51	58952	47262	0.2368	0.3623	0.6082	0.5728
Fulton	52	31511	26534	0.1765	0.2543	0.6372	0.6074
Fulton	53	59953	46944	0.1453	0.2143	0.5485	0.4998
Fulton	54	60083	50338	0.1547	0.2766	0.6104	0.5641
Fulton	55	59971	49255	0.5538	0.5960	0.8169	0.8121
Fulton	56	58929	52757	0.4548	0.5055	0.8971	0.9249
Fulton	57	59969	52097	0.1806	0.2543	0.8092	0.8025
Fulton	58	59057	50514	0.6304	0.6732	0.9213	0.9511
Fulton	59	59434	49179	0.7009	0.7332	0.9337	0.9603
Fulton	60	59709	45490	0.6388	0.6820	0.8065	0.8069
Fulton	61	29096	22287	0.9541	0.9658	0.9654	0.9789
Fulton	62	59450	46426	0.7226	0.7807	0.9254	0.9434
Fulton	63	59381	45043	0.6933	0.7761	0.9085	0.9279
Fulton	65	27048	20542	0.8293	0.8473	0.8952	0.9088
Fulton	67	41863	31238	0.8036	0.8785	0.8985	0.9164
Fulton	68	29758	22037	0.9004	0.9274	0.9278	0.9482
Fulton	69	21379	15994	0.9415	0.9655	0.9561	0.9811
Grady	171	8115	6461	0.1696	0.2131	0.2238	0.2074
Grady	173	18121	13501	0.3394	0.4507	0.4454	0.4338
Gwinnett	30	8620	6301	0.1584	0.2484	0.3775	0.3234
Gwinnett	48	15027	11394	0.1026	0.1660	0.4955	0.4395
Gwinnett	88	11845	8763	0.3005	0.5402	0.7198	0.7597
Gwinnett	94	28004	20992	0.4197	0.5235	0.6869	0.6571
Gwinnett	95	34221	25212	0.6639	0.7452	0.8115	0.8122
Gwinnett	96	59515	44671	0.2300	0.5797	0.6579	0.6661
Gwinnett	97	59072	46339	0.2677	0.4490	0.6617	0.6608
Gwinnett	98	59998	42734	0.2325	0.7459	0.7610	0.8075
Gwinnett	99	59850	45004	0.1471	0.2279	0.5261	0.4833
Gwinnett	100	35204	25378	0.1307	0.2425	0.4252	0.3789
Gwinnett	101	59938	46584	0.2419	0.4143	0.5632	0.5431
Gwinnett	102	58959	42968	0.3762	0.5767	0.6626	0.6503
Gwinnett	103	51691	38022	0.1879	0.3607	0.4796	0.4471
Gwinnett	104	35117	25457	0.2096	0.3042	0.3993	0.3442
Gwinnett	105	59344	43474	0.2905	0.4482	0.5553	0.5328
Gwinnett	106	59112	43890	0.3627	0.4648	0.5858	0.5390
Gwinnett	107	59702	44509	0.2963	0.5937	0.6884	0.6965
Gwinnett	108	59577	44308	0.1835	0.3578	0.5536	0.5107
Gwinnett	109	59630	44140	0.3251	0.6708	0.7711	0.8246
Gwinnett	110	59951	43226	0.4719	0.5645	0.6405	0.5965
Gwinnett	111	22685	16118	0.3307	0.4520	0.4726	0.4142
Hall	27	54508	42712	0.0386	0.1354	0.1804	0.1550
Hall	28	8108	6799	0.0284	0.1772	0.2527	0.2270
Hall	29	59200	43131	0.1359	0.5284	0.4485	0.4704
Hall	30	50646	39113	0.0685	0.2374	0.2707	0.2393
Hall	31	14349	9789	0.1036	0.6834	0.4858	0.5209
Hall	100	7819	5923	0.0653	0.1867	0.2453	0.2134
Hall	103	8506	6377	0.0486	0.1396	0.2653	0.2319

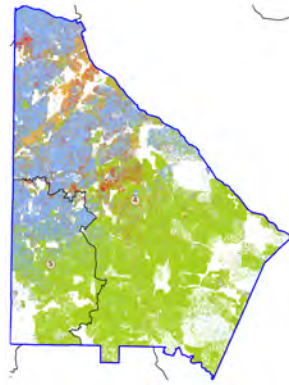
County	HD	TOTPOP	VAP	BVAP	BHVAP share	Biden20	Abrams18
Henry	74	18397	13441	0.4742	0.5356	0.5834	0.5642
Henry	78	3847	2965	0.6921	0.7292	0.8470	0.8768
Henry	91	35569	27415	0.5887	0.6628	0.7223	0.7183
Henry	115	60174	44807	0.5213	0.5797	0.6153	0.5443
Henry	116	55759	42471	0.5808	0.6380	0.6848	0.6669
Henry	117	54737	40246	0.3841	0.4324	0.4416	0.3759
Henry	118	12229	8628	0.1868	0.2258	0.2874	0.2449
Houston	145	28132	20686	0.5239	0.6021	0.6151	0.6114
Houston	146	60203	44589	0.2761	0.3192	0.3840	0.3558
Houston	147	59178	44902	0.3012	0.3678	0.4662	0.4414
Houston	148	16120	11941	0.2453	0.2778	0.3271	0.3070
Lamar	134	5026	3864	0.0970	0.1198	0.1786	0.1839
Lamar	135	13474	10677	0.3411	0.3603	0.3798	0.3906
Lowndes	174	9770	7472	0.1453	0.1935	0.2019	0.1828
Lowndes	175	43692	31957	0.2018	0.2494	0.3784	0.4034
Lowndes	176	4797	3588	0.2717	0.3743	0.4485	0.4632
Lowndes	177	59992	46014	0.5388	0.5936	0.5139	0.5285
McDuffie	125	4748	3805	0.1198	0.1532	0.2199	0.1901
McDuffie	128	16884	12810	0.4660	0.4938	0.4365	0.4312
Muscogee	137	30443	22797	0.6269	0.6746	0.6665	0.6618
Muscogee	138	12190	9628	0.1224	0.1692	0.3389	0.2796
Muscogee	139	45976	35539	0.2128	0.2770	0.4306	0.3842
Muscogee	140	59294	44411	0.5763	0.6468	0.7471	0.7692
Muscogee	141	59019	44677	0.5746	0.6305	0.7368	0.7428
Newton	93	15515	12080	0.5094	0.5404	0.5824	0.5743
Newton	113	60053	44538	0.5953	0.6533	0.7534	0.7636
Newton	114	36915	28130	0.2760	0.3104	0.3491	0.3299
Paulding	16	16549	11771	0.0981	0.1406	0.2447	0.2194
Paulding	17	59120	42761	0.2302	0.2934	0.3580	0.3264
Paulding	18	10627	7838	0.1069	0.1355	0.1902	0.1750
Paulding	19	58955	44299	0.2415	0.3025	0.3762	0.3525
Paulding	64	23410	17329	0.3249	0.3881	0.4450	0.4147
Peach	145	14093	11209	0.2211	0.2688	0.3275	0.3039
Peach	150	13888	10902	0.6643	0.7715	0.7004	0.7216
Richmond	126	25990	19714	0.6887	0.7181	0.7709	0.7804
Richmond	127	19152	15842	0.2599	0.2945	0.4192	0.3905
Richmond	129	58829	46873	0.5487	0.5835	0.6537	0.6344
Richmond	130	59203	44019	0.5991	0.6308	0.6388	0.6298
Richmond	132	43433	34451	0.5267	0.6146	0.7759	0.7966
Rockdale	91	4781	3817	0.4923	0.5179	0.5997	0.5626
Rockdale	92	44666	34757	0.6054	0.6511	0.7185	0.6871
Rockdale	93	32913	24178	0.6379	0.7670	0.8062	0.8013
Rockdale	95	11210	8751	0.4101	0.4845	0.5276	0.4859
Spalding	74	16815	13276	0.1990	0.2531	0.3220	0.3121
Spalding	117	5393	4727	0.2128	0.2520	0.4014	0.3618
Spalding	134	45098	34120	0.4063	0.4443	0.4206	0.4157
Telfair	149	9486	7884	0.3950	0.5747	0.3762	0.3533
Telfair	156	2991	2306	0.3001	0.3157	0.4131	0.4024
Thomas	172	4176	3246	0.1497	0.1753	0.2050	0.2061
Thomas	173	41622	31791	0.3726	0.3977	0.4351	0.4150
Tift	169	6730	5219	0.1129	0.1590	0.1807	0.1494
Tift	170	34614	26005	0.3220	0.4365	0.3806	0.3429
Troup	72	10281	7843	0.2076	0.2372	0.2844	0.3005
Troup	136	17913	13414	0.5139	0.5540	0.5738	0.6049
Troup	137	16144	12084	0.3974	0.4346	0.3855	0.3868
Troup	138	25088	19240	0.2535	0.2783	0.3040	0.2878
Whitfield	2	27861	21447	0.0331	0.1741	0.2209	0.1926
Whitfield	4	59070	42798	0.0538	0.4915	0.3551	0.3367
Whitfield	6	15933	12017	0.0280	0.1597	0.2017	0.1727

Table 57: Counties with more than 15 points BHVAP differential across House districts (table in three parts).

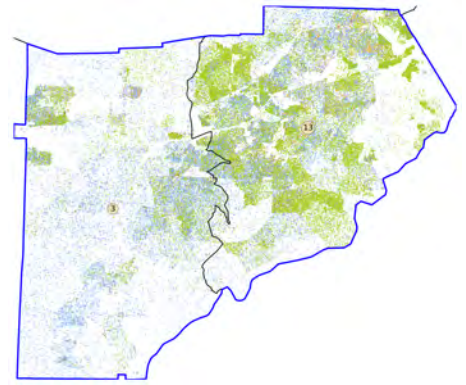




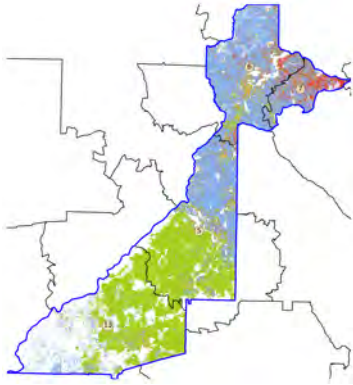
Cobb



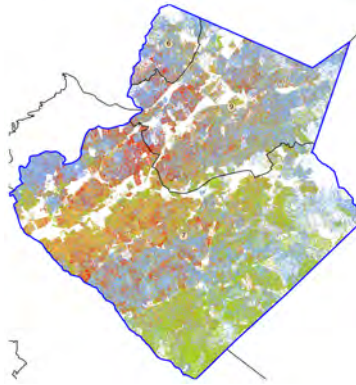
DeKalb



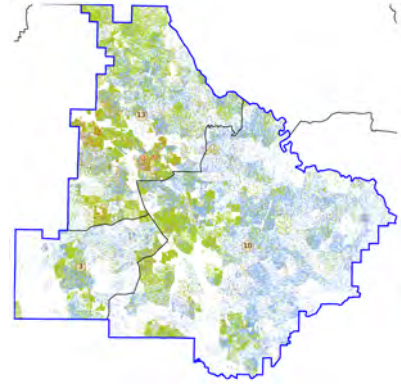
Douglas



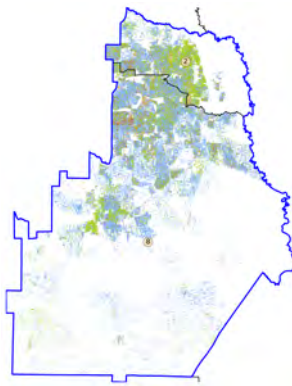
Fulton



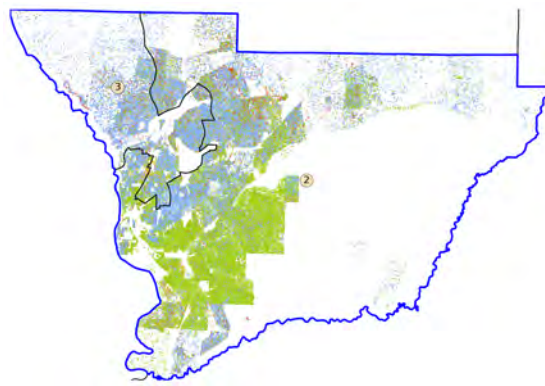
Gwinnett



Henry



Houston



Muscogee

Figure 39: Additional county splits in the enacted Congressional plan with racially distinctive patterns at the boundary lines.



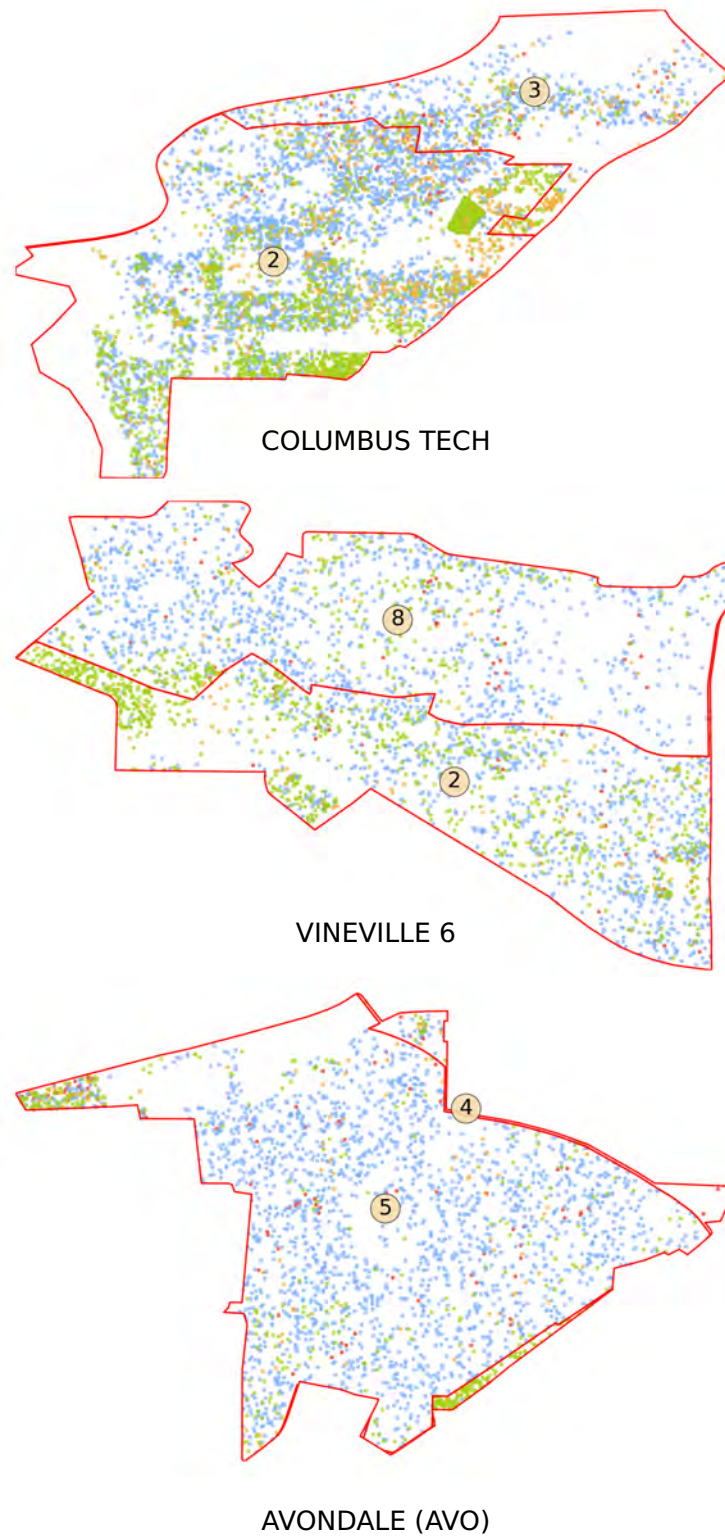


Figure 40: Illustrative precinct splits in the enacted Congressional plan showing racially distinctive patterns at the boundary lines.

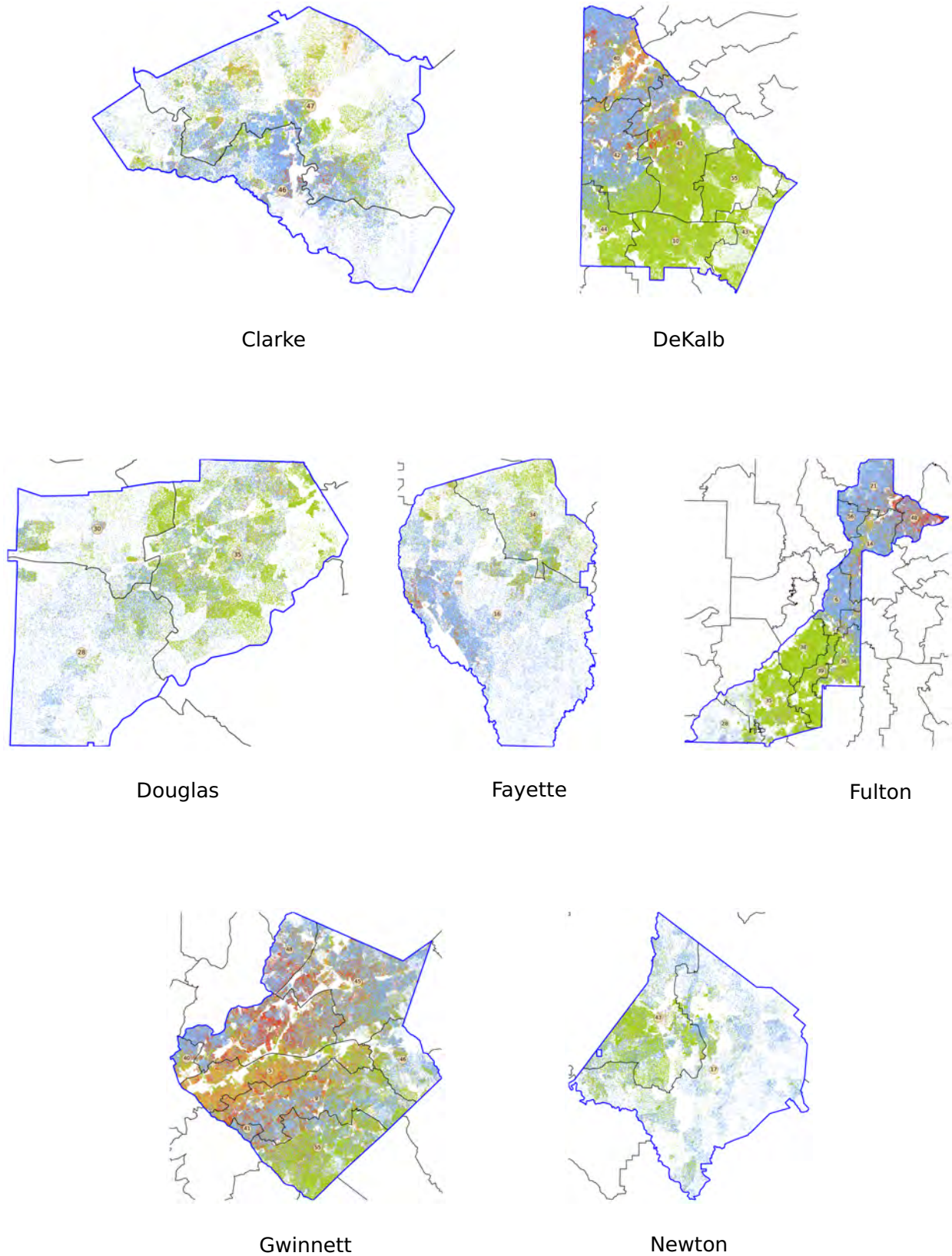
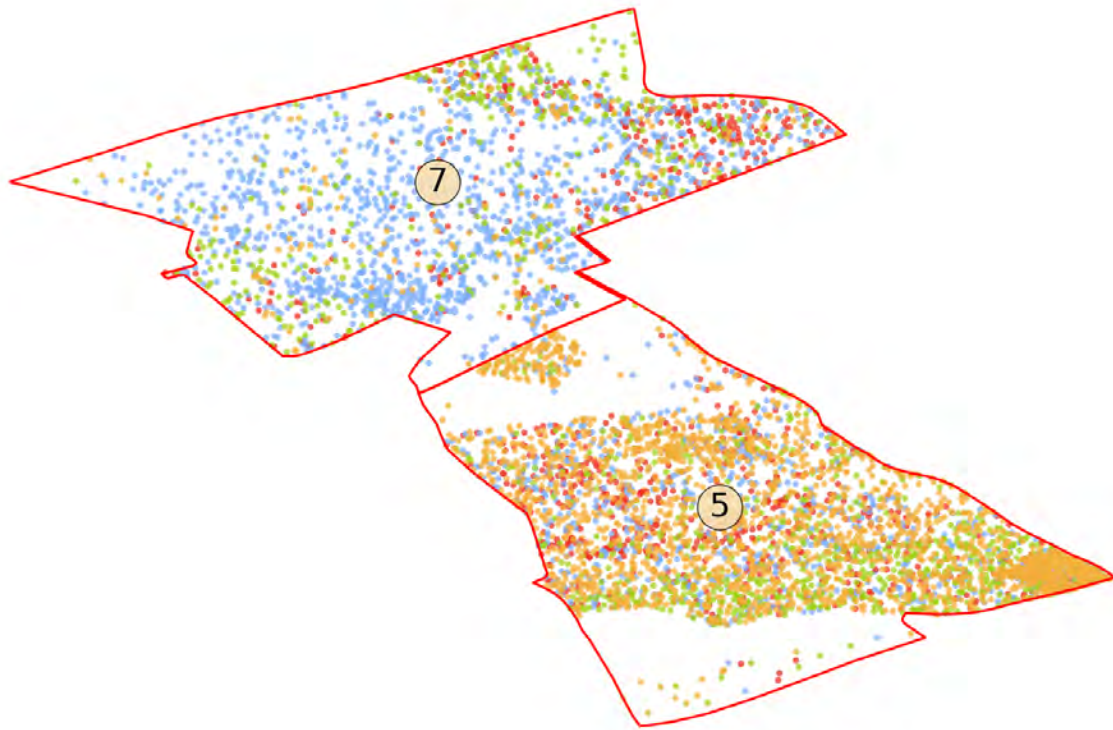


Figure 41: Additional county splits in the enacted Senate plan with racially distinctive patterns at the boundary lines.



PINCKNEYVILLE W

Figure 42: An illustrative precinct split in the enacted Senate plan showing a racially distinctive pattern at the boundary lines.



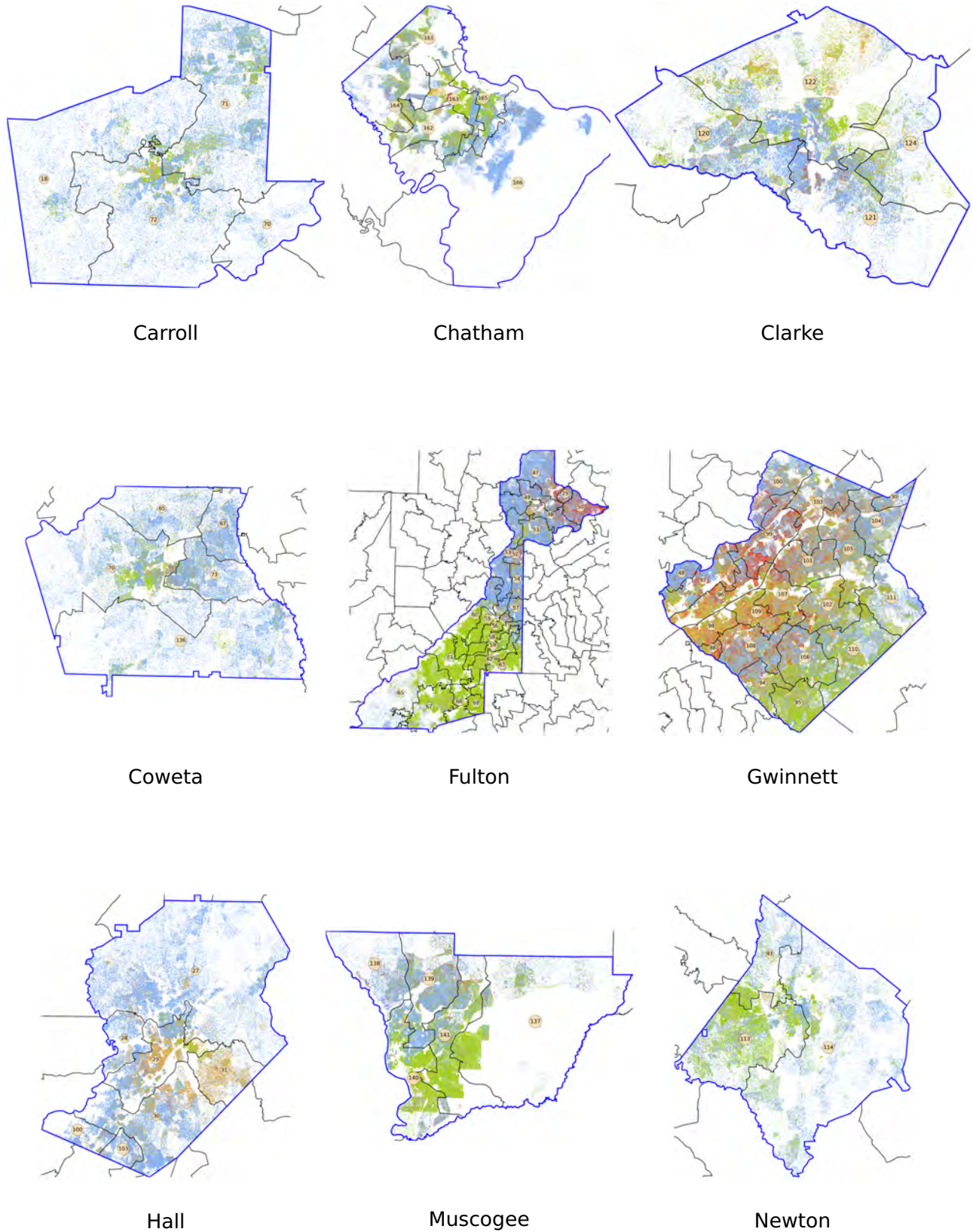
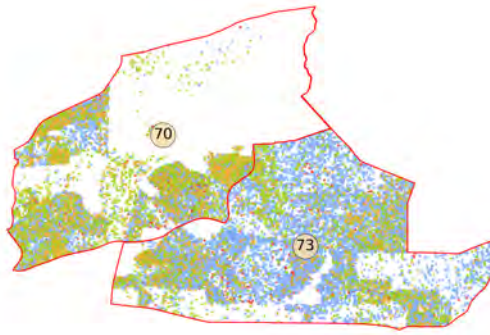
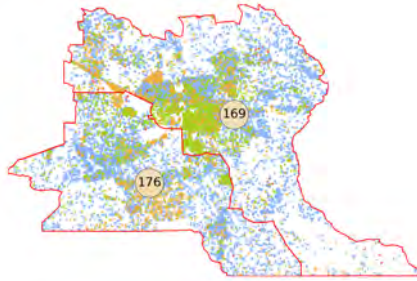


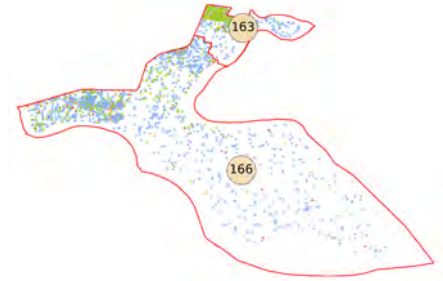
Figure 43: Illustrative county splits in the enacted House plan with racially distinctive patterns at the boundary lines.



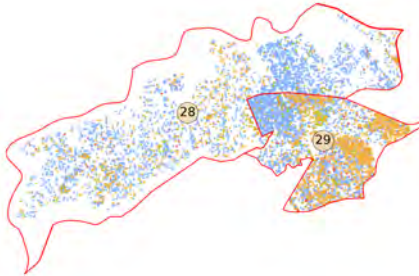
THE NEWNAN CENTRE



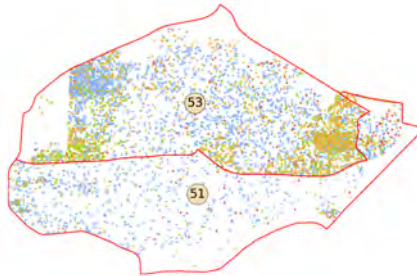
DOUGLAS



WINDSOR FOREST  
BAPTIST CHURCH SCHOOL



WILSON



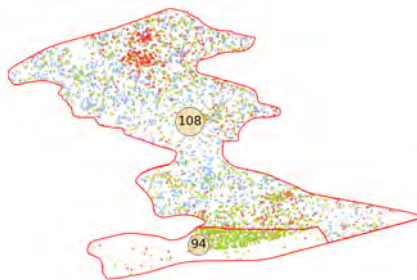
RW03



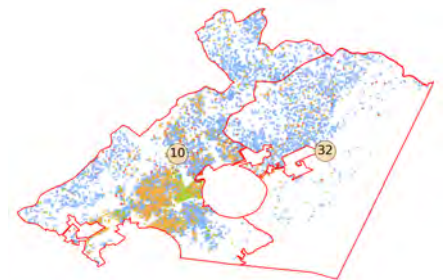
TUCKER



PINCKNEYVILLE W



CATES J



HABERSHAM SOUTH

Figure 44: Illustrative precinct splits in the enacted House plan with racially distinctive patterns at the boundary lines.

I reserve the right to continue to supplement my report in light of additional facts, testimony and/or materials that may come to light. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information, and belief.

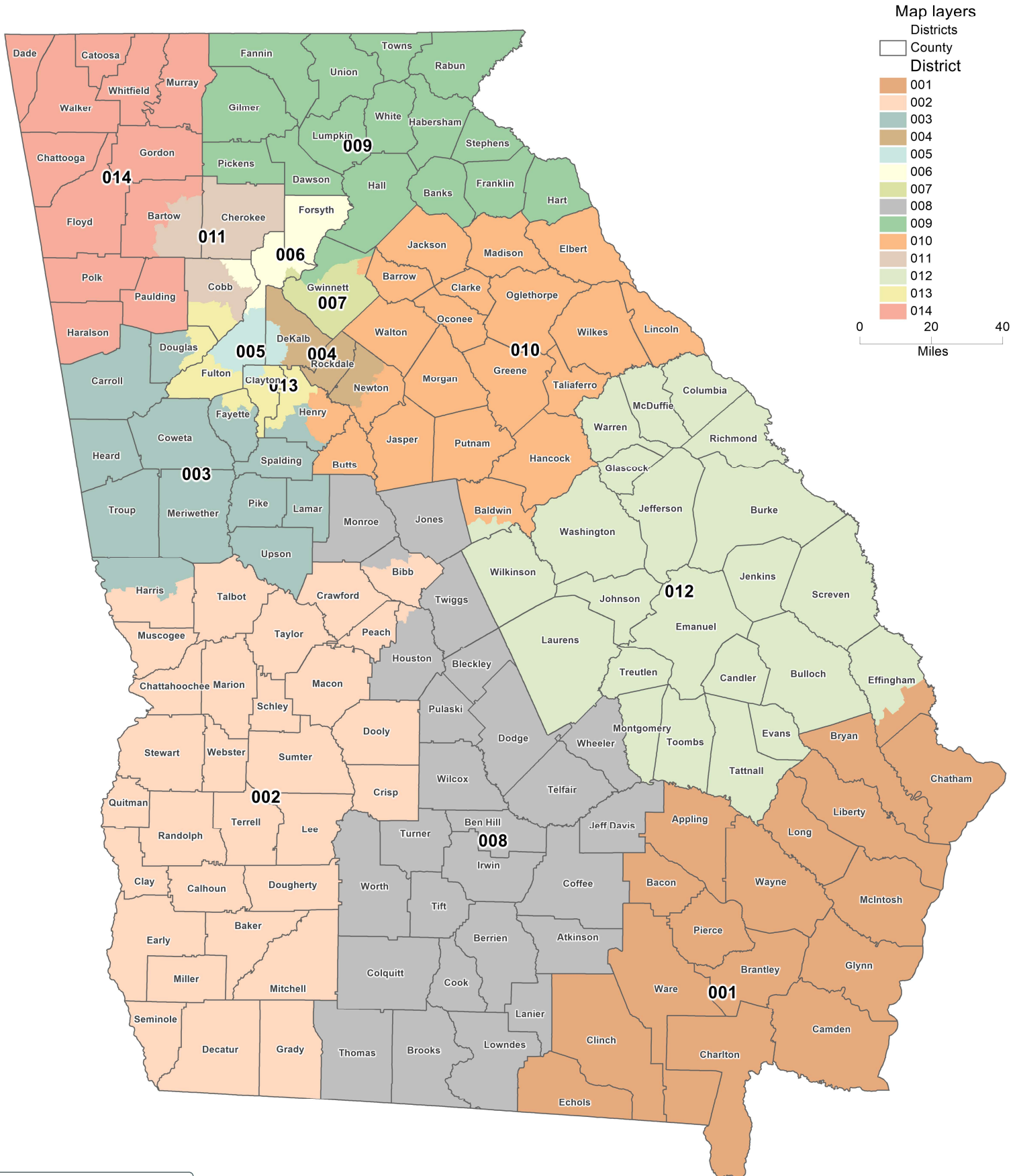
Executed this 13th day of January, 2023.

A handwritten signature in black ink, appearing to read 'Moon Duchin', written over a horizontal line.

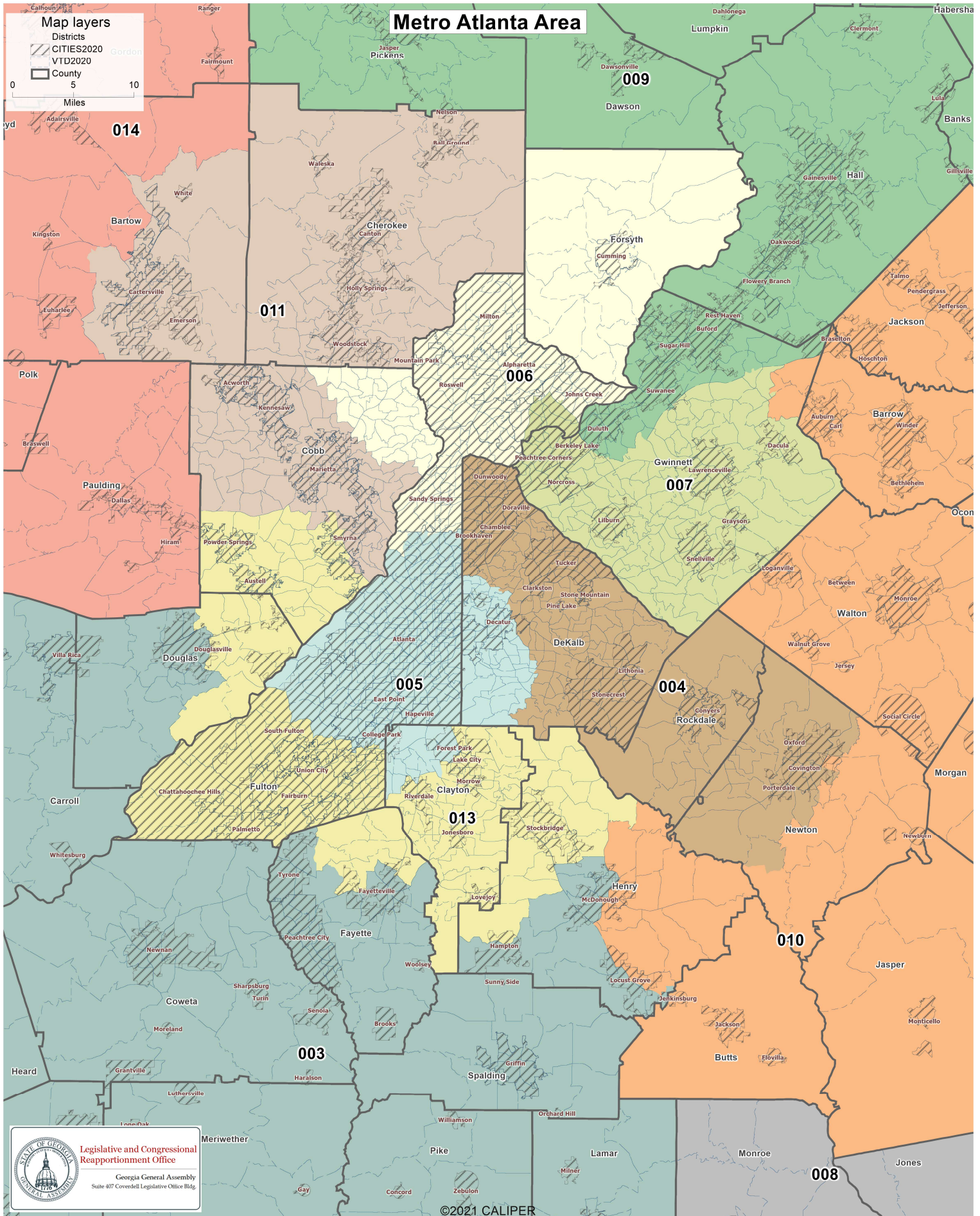
Moon Duchin

# EXHIBIT 25



**Draft- Georgia Congressional Districts**



**Draft- Georgia Congressional Districts**

User: S018

Plan Name: cong-s18-p1

Plan Type: Congress

## Population Summary

Tuesday, September 28, 2021

8:48 AM

### Summary Statistics:

Population Range: 765,135 to 765,138  
 Ratio Range: 0.00  
 Absolute Range: -1 to 2  
 Absolute Overall Range: 3  
 Relative Range: 0.00% to 0.00%  
 Relative Overall Range: 0.00%  
 Absolute Mean Deviation: 0.86  
 Relative Mean Deviation: 0.00%  
 Standard Deviation: 1.03

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	765,138	2	0.00%	589,477	77.04%	57.36%	27.69%	7.86%	2.19%	0.24%	0.16%	0.44%	4.07%
002	765,135	-1	0.00%	589,333	77.02%	41.68%	47.12%	5.9%	1.5%	0.2%	0.11%	0.35%	3.15%
003	765,135	-1	0.00%	583,333	76.24%	58.57%	27.89%	6.79%	2.1%	0.21%	0.04%	0.52%	3.89%
004	765,135	-1	0.00%	587,972	76.85%	25.85%	52.51%	11.52%	5.88%	0.16%	0.04%	0.64%	3.4%
005	765,137	1	0.00%	621,562	81.24%	32.66%	52.8%	6.5%	3.85%	0.16%	0.04%	0.53%	3.47%
006	765,136	0	0.00%	575,220	75.18%	60.96%	8.97%	10.26%	14.83%	0.14%	0.03%	0.69%	4.12%
007	765,135	-1	0.00%	567,113	74.12%	29.31%	29.42%	25.07%	11.87%	0.16%	0.04%	0.69%	3.43%
008	765,136	0	0.00%	583,009	76.2%	57.3%	30.05%	7.4%	1.52%	0.2%	0.04%	0.31%	3.18%
009	765,136	0	0.00%	595,476	77.83%	68.18%	7.45%	14.11%	6.06%	0.21%	0.03%	0.38%	3.58%
010	765,137	1	0.00%	591,955	77.37%	65.41%	20.66%	7.37%	2.33%	0.18%	0.03%	0.51%	3.51%
011	765,136	0	0.00%	594,934	77.76%	60.24%	16.93%	13.26%	3.96%	0.18%	0.04%	0.87%	4.53%
012	765,138	2	0.00%	586,770	76.69%	52.49%	35.68%	5.65%	1.83%	0.22%	0.11%	0.37%	3.65%
013	765,137	1	0.00%	574,626	75.1%	17.83%	61.68%	13.2%	3.24%	0.18%	0.04%	0.67%	3.15%
014	765,137	1	0.00%	579,494	75.74%	72.97%	9.58%	11.94%	1.02%	0.22%	0.04%	0.37%	3.85%

**Total: 10,711,908****Ideal District: 765,136**

User: S018

Plan Name: cong-s18-p1

Plan Type: Congress

## Population Summary

Tuesday, September 28, 2021

8:49 AM

### Summary Statistics:

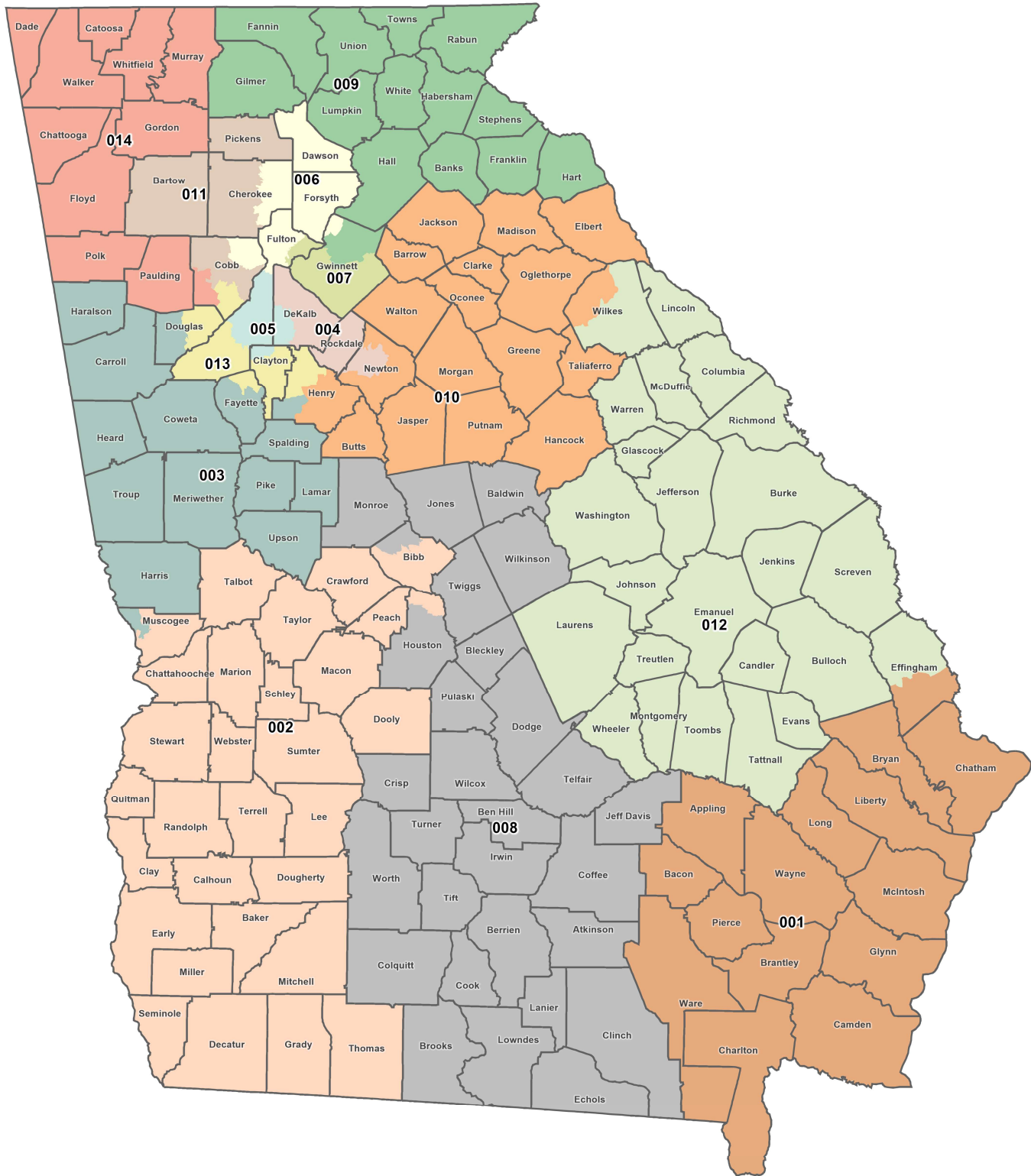
Population Range:	765,135 to 765,138
Ratio Range:	0.00
Absolute Range:	-1 to 2
Absolute Overall Range:	3
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.86
Relative Mean Deviation:	0.00%
Standard Deviation:	1.03

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	765,138	2	0.00%	589,477	77.04%	60.22%	26.57%	6.86%	2.36%	0.26%	0.15%	0.37%	3.22%
002	765,135	-1	0.00%	589,333	77.02%	44.42%	45.77%	5.08%	1.56%	0.22%	0.1%	0.29%	2.57%
003	765,135	-1	0.00%	583,333	76.24%	61.37%	26.97%	5.78%	2.11%	0.22%	0.04%	0.42%	3.1%
004	765,135	-1	0.00%	587,972	76.85%	28.24%	52.19%	10.02%	5.82%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,562	81.24%	34.84%	51.18%	5.97%	4.27%	0.16%	0.04%	0.48%	3.05%
006	765,136	0	0.00%	575,220	75.18%	63.79%	9.11%	9.15%	13.82%	0.13%	0.04%	0.62%	3.35%
007	765,135	-1	0.00%	567,113	74.12%	32.6%	28.65%	22.49%	12.65%	0.16%	0.04%	0.59%	2.82%
008	765,136	0	0.00%	583,009	76.2%	59.93%	29.17%	6.3%	1.58%	0.21%	0.04%	0.24%	2.53%
009	765,136	0	0.00%	595,476	77.83%	71.64%	7.16%	11.67%	6%	0.22%	0.03%	0.31%	2.96%
010	765,137	1	0.00%	591,955	77.37%	67.84%	20.06%	6.22%	2.35%	0.19%	0.03%	0.44%	2.87%
011	765,136	0	0.00%	594,934	77.76%	62.95%	16.79%	11.46%	4.04%	0.18%	0.04%	0.79%	3.74%
012	765,138	2	0.00%	586,770	76.69%	55.01%	34.63%	4.89%	1.95%	0.22%	0.1%	0.3%	2.89%
013	765,137	1	0.00%	574,626	75.1%	20.54%	61.07%	11.35%	3.46%	0.19%	0.04%	0.61%	2.73%
014	765,137	1	0.00%	579,494	75.74%	75.96%	9.3%	9.92%	1.05%	0.24%	0.04%	0.29%	3.21%

**Total: 10,711,908****Ideal District: 765,136**

# EXHIBIT 26



**Proposed Joint Congressional Districts of Georgia**Legislative and Congressional  
Reapportionment OfficeGeorgia General Assembly  
Suite 407 Coverdell Legislative Office Bldg.

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Map layers

Districts

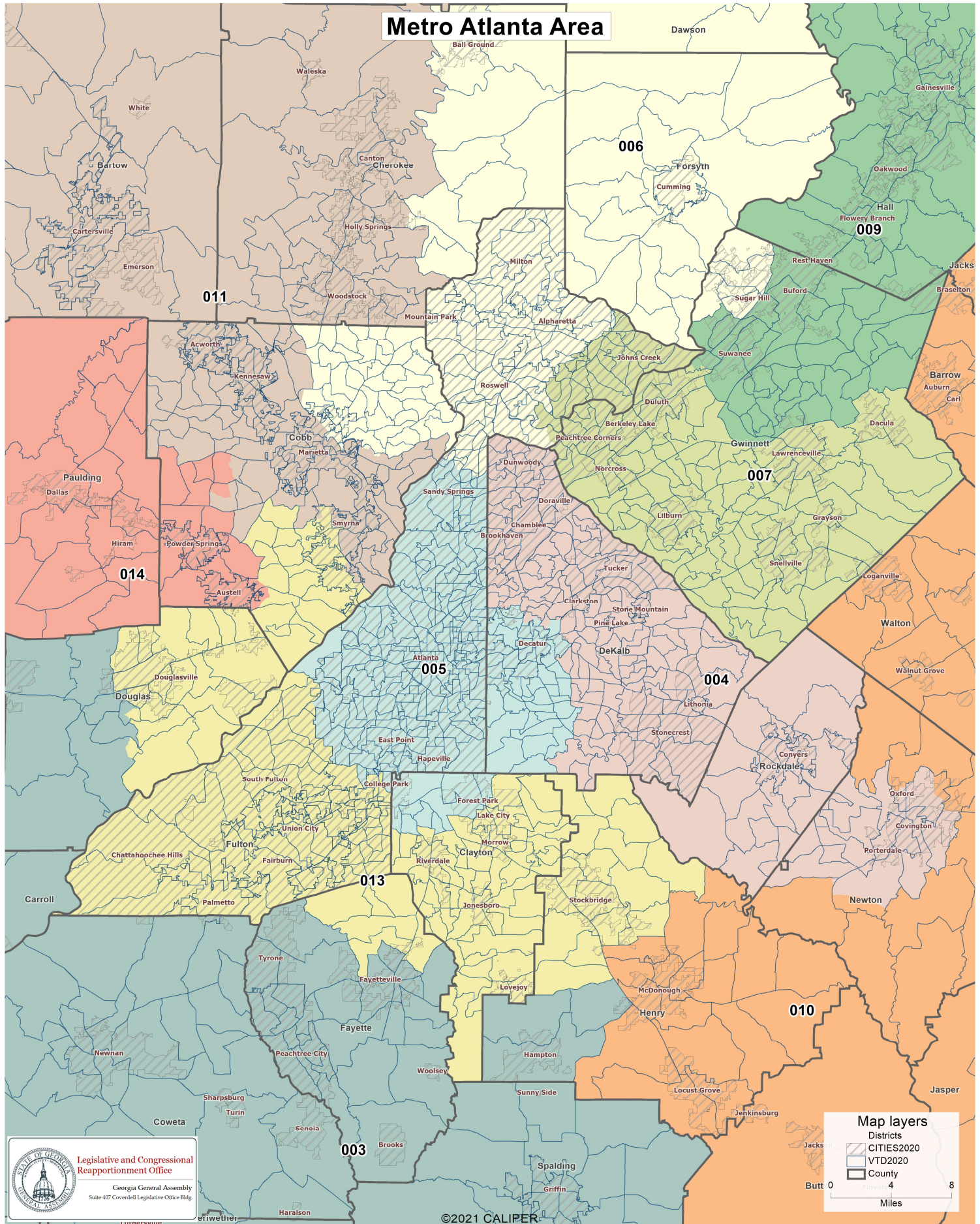


County

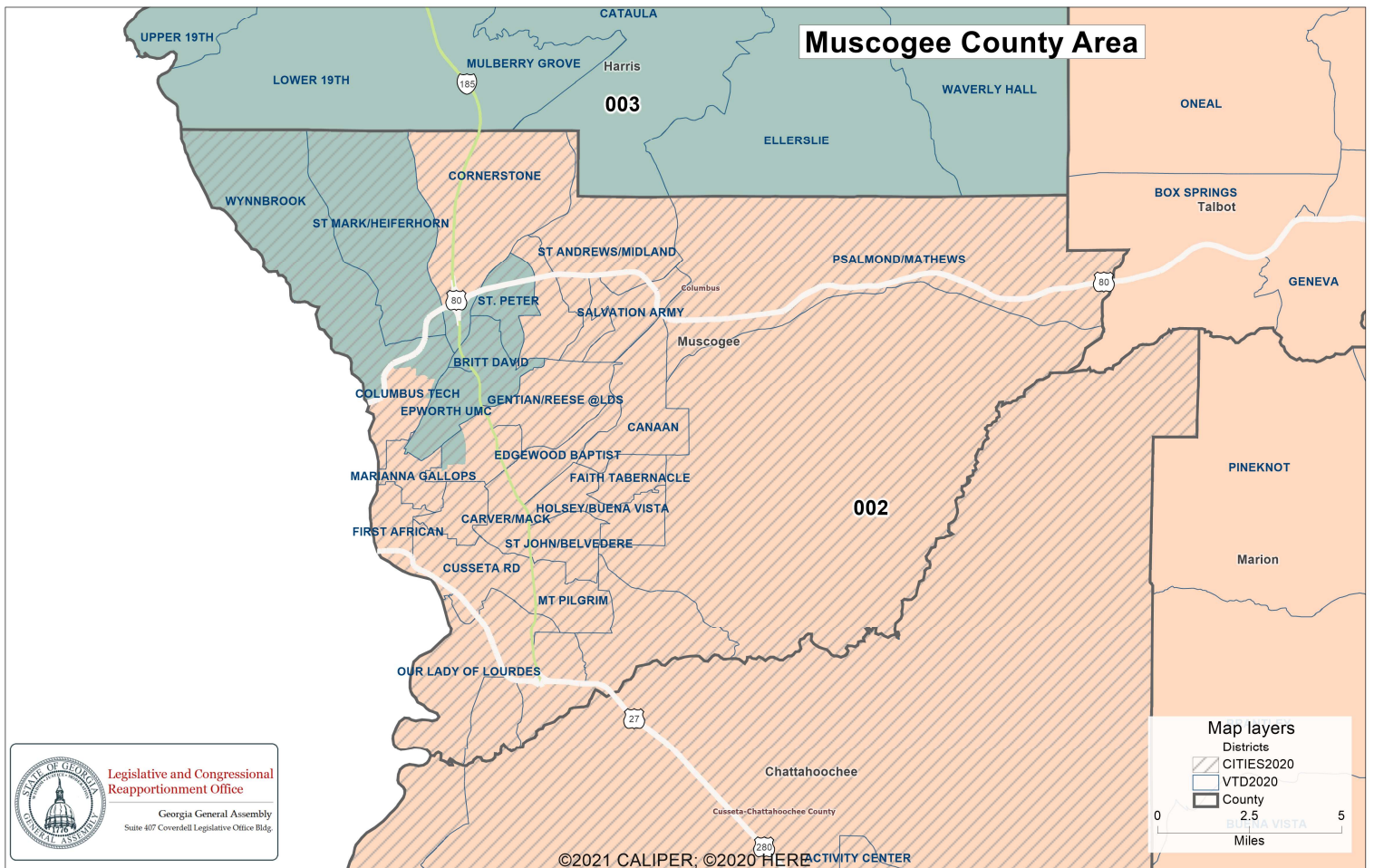
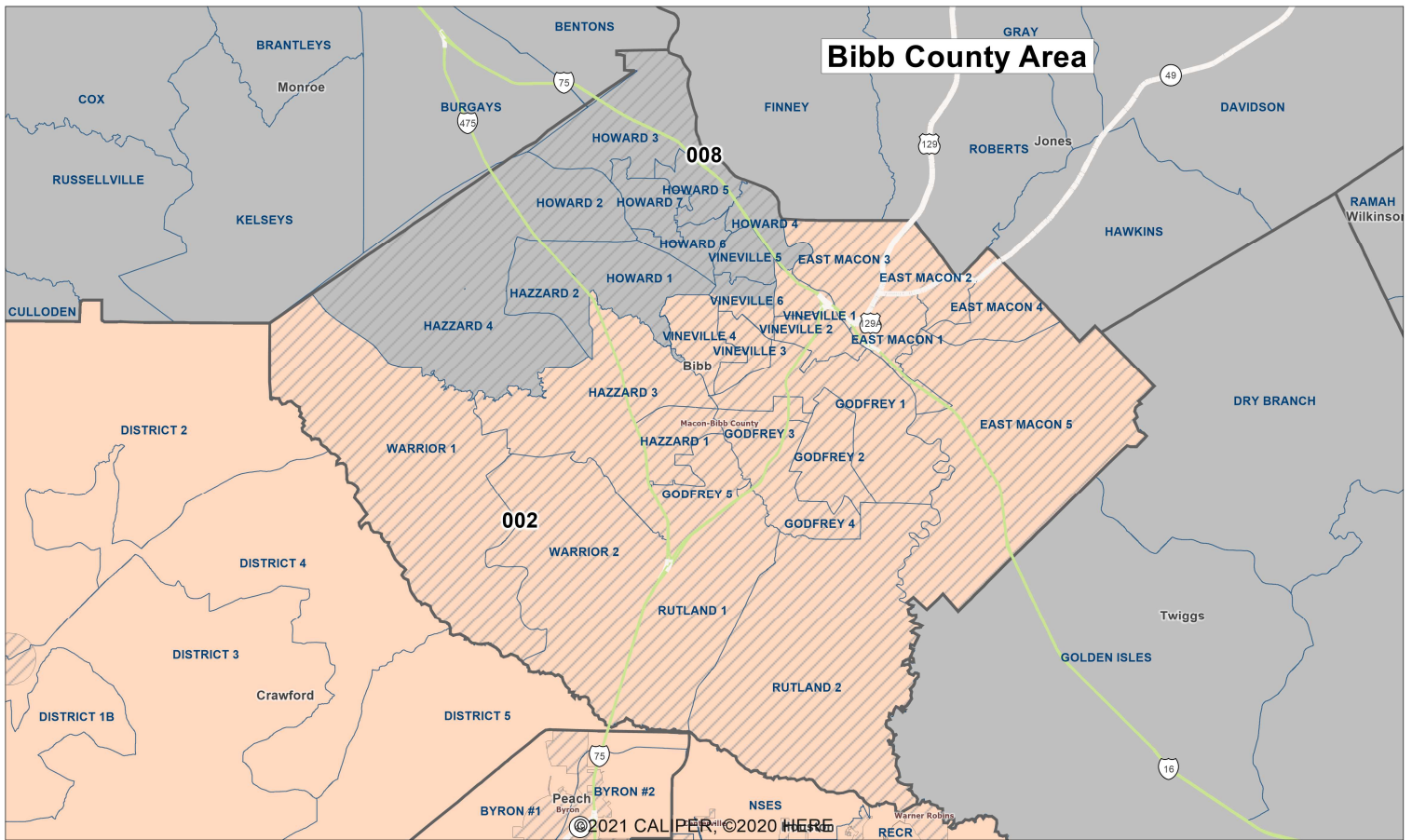
0 20 40  
Miles



# Proposed Joint Congressional Districts of Georgia





**Proposed Joint Congressional Districts of Georgia**Legislative and Congressional  
Reapportionment OfficeGeorgia General Assembly  
Suite 407 Cowdell Legislative Office Bldg.

User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

## Population Summary

### Summary Statistics:

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

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

**Total:** 10,711,908

**Ideal District:** 765,136



User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

## Population Summary

### Summary Statistics:

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

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

Total: 10,711,908

Ideal District: 765,136

# EXHIBIT 27

# Rebuttal and Supplemental Report

Moon Duchin  
Professor of Mathematics, Tufts University  
Senior Fellow, Tisch College of Civic Life

February 15, 2023

In this report, I will rebut certain opinions contained in the Expert Report of John Morgan on behalf of defendants, dated December 5, 2022. I will also supplement my own expert report of January 13, 2023 (and further rebut the Morgan Report) in light of the deposition transcript of Gina Wright, Executive Director of the Legislative and Congressional Reapportionment Office of the Georgia General Assembly, dated January 26, 2023. Appendix C below also makes a minor correction to an Appendix from my January 13 report.

## 1 Response to Morgan Report

### 1.1 Intent can not be reliably inferred from a single alternative map

The report of John Morgan is based on the following premise: by drawing a single alternative plan for each chamber of the Georgia legislature, he can illuminate the intent behind the enacted plans and their balancing of numerous criteria in play for electoral maps.<sup>1</sup>

In Mr. Morgan's words,

I was asked to draw a "blind" plan that did not consider race or incumbency or past redistricting plans for Georgia. This plan did consider other traditional redistricting principles. Using my expertise, I proceeded to draw a plan for the House and then a plan for the Senate. I then compared the illustrative plans to the enacted plans and drew conclusions about the impact of racial considerations on the enacted plans. (¶5, page 3)

Comparison techniques are well established in the scholarly literature to illuminate the intent and/or effects of a particular choice of district boundaries. In particular, there is a long tradition of using a collection of publicly available alternative maps as a comparator for a proposed plan; to give just one example from a published article, Altman-McDonald [2] use a batch of alternative plans to illustrate different tradeoffs facing line-drawers in Virginia in a law review article from 2013. Altman and McDonald present numerous plans for each map they consider, including enacted plans, draft plans by the legislature, draft plans by an advisory commission, and alternatives generated by students in the context of a competition. Citing that article, DeFord-Duchin [3] approach the same problem but leverage more recent algorithmic techniques, offering collections (called *ensembles*) containing tens of thousands of alternative plans made under explicit interpretations of the rules and priorities in the Virginia guidelines. Whether armed with dozens or thousands of alternatives, authors can then conclude with varying degrees of persuasive strength about the interaction of different principles: Does a priority on county preservation tend to have an impact on compactness scores? Did

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<sup>1</sup>In Mr. Morgan's accounting, the principles he set aside are race, incumbency, and consideration of prior district boundaries. "Other" principles that he mentions—and presumably did consider in making his maps—include population balance, compactness by at least two measures, contiguity, "civic boundaries" (particularly those of counties, municipalities, and precincts), geographic features, and respect for communities of interest.

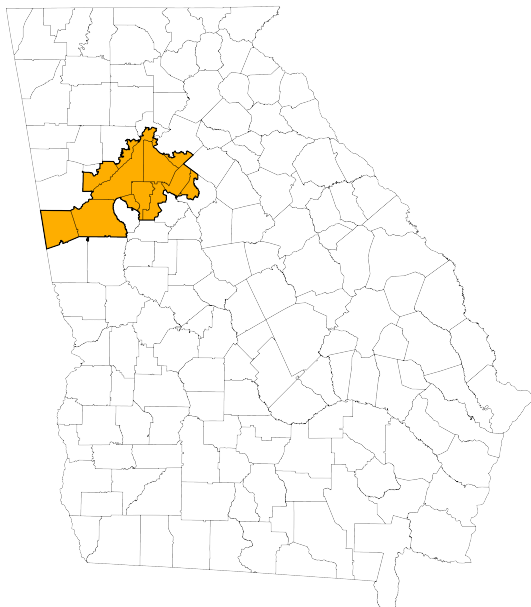
the special master's choice of how to break down the state into zones impose a partisan skew, relative to plans made without that zoning? And so on. Authors whose work uses comparisons with dozens, hundreds, or thousands of maps to make inferences of intent include, but are not limited to, Grofman, Mattingly, Imai, Chen, Clelland, Randall, as well as myself in collaboration with numerous co-authors.

In my opinion, based on my experience both with computational redistricting and through examining maps prepared by people with competing priorities in play, it would be impossible to draw any reliable conclusions as to lack of intent based on comparing a plan to a single alternative. This is especially true when the single comparator plan is drawn with a vague aim to pursue a long list of "other traditional redistricting principles" without differentiation or prioritization.

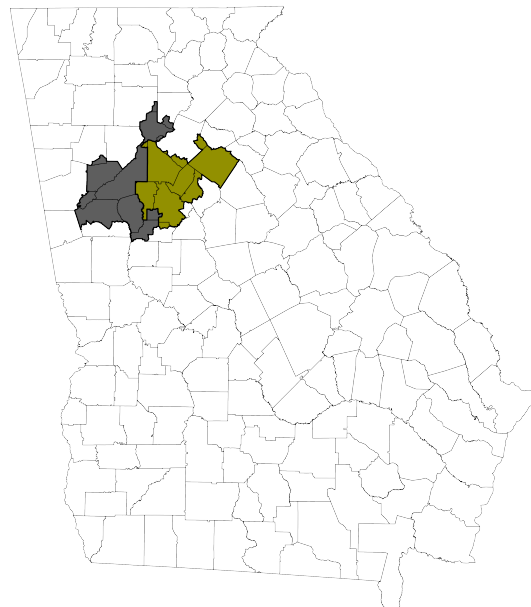
Below, I will take up Mr. Morgan's proposed method and execute it in a more scientific and systematic way, by using algorithmic generation of plans with varied priorities to better illuminate the choices and tradeoffs in the enacted plans.

The Morgan report identifies three regions of Georgia for analysis, each of which is replaced with an alternative map covering roughly (but not exactly) the same terrain. The regions are

- Senate Metro Region, made up of enacted districts 6, 10, 14, 28, 34, 35, 36, 38, 39, 40, 41, 42, 43, 44, 55 (15 districts);
- House Region 1, made up of enacted districts 52, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 111, 112, 113, 115, 116, 117 (28 districts);
- House Region 2, made up of enacted districts 25, 47, 48, 49, 50, 51, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 73, 74 (26 districts).



Senate Metro Region



House Region 1 (olive green)  
and House Region 2 (gray)

Figure 1: Regions from the enacted legislative plans, as designated in the Morgan Report.

The alternative plans presented in the Morgan report are not limited to these regions but are drawn statewide.

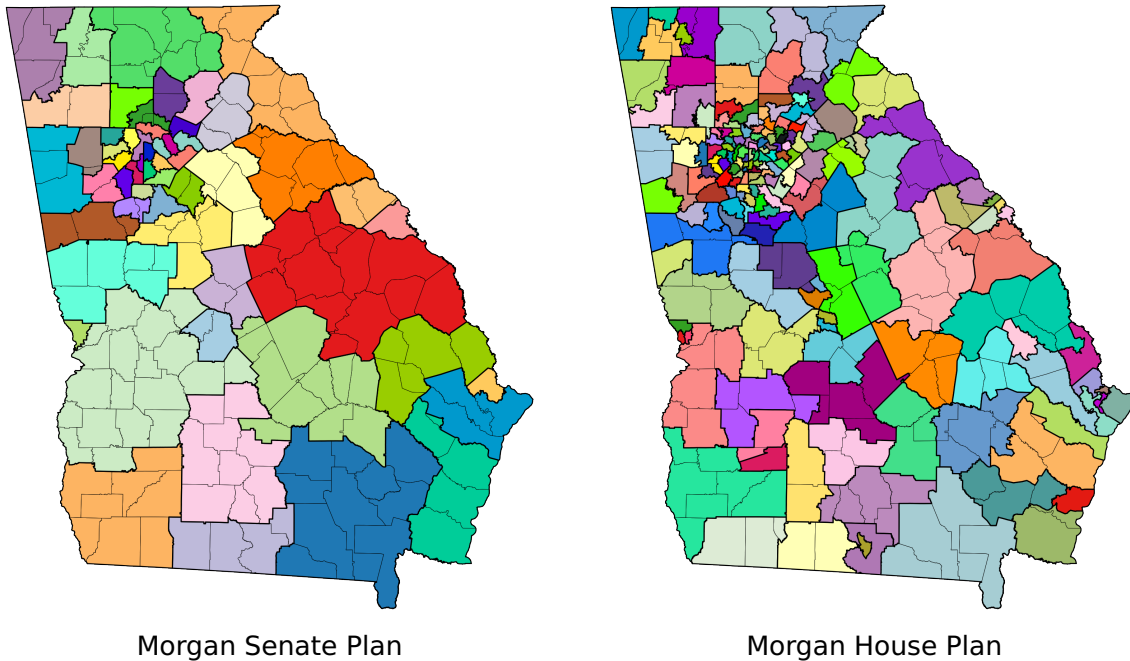


Figure 2: Statewide alternative plans presented in the Morgan Report for the chambers of the state legislature.

## 1.2 Majority-minority districts and effective opportunity-to-elect

	majority BVAP	majority BHVAP	majority BHCVAP	effective opportunity
<b>EnactedCD</b>	2	5	4	5
<b>CD Alt</b>	4	6	6	6
<b>EnactedSD</b>	14	17	17	19
<b>MorganSD</b>	11	19	17	20
<b>SD Alt Eff 1</b>	17	23	22	23
<b>EnactedHD</b>	49	62	60	68
<b>MorganHD</b>	35	48	44	67
<b>HD Alt Eff 1</b>	50	77	74	77

Table 1: The first three columns report the number of majority-BVAP, majority-BHVAP, and majority-BHCVAP districts, in the plans under discussion in this report—this counts majority-minority districts by Black voting age population, Black and Hispanic voting age population, and Black and Hispanic citizen voting age population, respectively. The final column reports the number of districts labeled as "effective" for Black and Latino opportunity to elect candidates of choice. CD Alt, SD Alt Eff 1, and HD Alt Eff 1 are my own alternative plans that were proposed in my January 13 report.

Table 1 shows a few remarkable facts about the Morgan plans. One is that Mr. Morgan's race-blind Senate plan actually has a *greater* number of districts with a majority of Black and Hispanic VAP (19 rather than 17), and an equal number by CVAP (17), relative to the enacted plan. Another striking contrast can be drawn from examining Mr. Morgan's plans in terms of *effectiveness* in providing electoral opportunity for Black and Latino voters to elect candidates of choice.<sup>2</sup> Here, the Morgan alternative plans are remarkably similar to the enacted plan. MorganHD has 67 effective districts to the enacted plan's 68, and MorganSD actually outperforms the state, with 20 effective districts to the enacted plan's 19.

In other words, the enacted legislative plans do indeed have more majority-Black districts than the Morgan plans, but this is achieved while slightly *diminishing* opportunity to elect in the Senate plan and offering the barest increase in the House plan relative to Mr. Morgan's "blind" plans.

In particular, the state's Senate plan, which is required to comply with the Voting Rights Act, offers Black and Latino voters less electoral opportunity than a plan drawn "blind" by the state's own expert with no regard to the VRA.

### 1.3 Experiment: Pursuing majority-Black districts

By comparing the enacted districts with his alternative districts, Mr. Morgan makes the following conclusions:

- "In my opinion, the creation of additional black majority districts in [House] region 1 [led] to lower compactness scores in this region." (¶30, p23)
- "In my opinion, the creation of additional black majority districts in [House] region 2 [led] to lower compactness scores in this region." (¶34, p29)
- "In my opinion, the creation of an additional black majority district in the [Senate Metro] region [led] to lower compactness scores in this region." (¶46, p42)

I have conducted a simple experiment to examine whether there is evidence of the causality that is ascribed by Mr. Morgan. To do so, I have run an algorithmic procedure that randomly alters districting plans, with a specification favoring plans with more majority-Black districts. I ran this chain of districting plans for 100,000 steps on the regions House Region 1, House Region 2, and Senate Metro Region from the Morgan report. With these outputs, I can ask whether plans with more majority-Black districts are necessarily less compact.

I do not find that this is the case; on the contrary, an exploratory search turns up tens of thousands of examples that are at least as compact as the enacted plan with at least as many majority-BVAP districts.<sup>3</sup> Notably, the alternatives I am considering are an exact match for the region covered by the enacted districts Mr. Morgan has selected, whereas his own alternatives are only approximate, and do not cover the same terrain.

<sup>2</sup>As detailed in §5 of my January 13 report (p15-19), an "effective" district is one in which the coalition candidate of choice would have won at least three out of four primary contests and five out of eight general contests from a dataset of probative elections.

<sup>3</sup>It is important to emphasize that this experiment was conducted to test a hypothesis about the relationship between majority-Black districts and compactness in the state's plan, not to maximize the number of majority-Black districts. Use of algorithmic techniques known as *heuristic optimization* or *local search* can find many examples with 4 majority-BVAP Congressional districts, 21 majority-BVAP Senate districts, and 66 majority-BVAP House districts. In Figure 3, I use block cut edges as a compactness score. Since the transcript of Director Wright's deposition indicated that the state did not use any particular compactness score, but favored the "eyeball test," I have also provided a visual comparison in Appendix 6 to demonstrate that these techniques also produce districts that are compact by informal, visual standards.

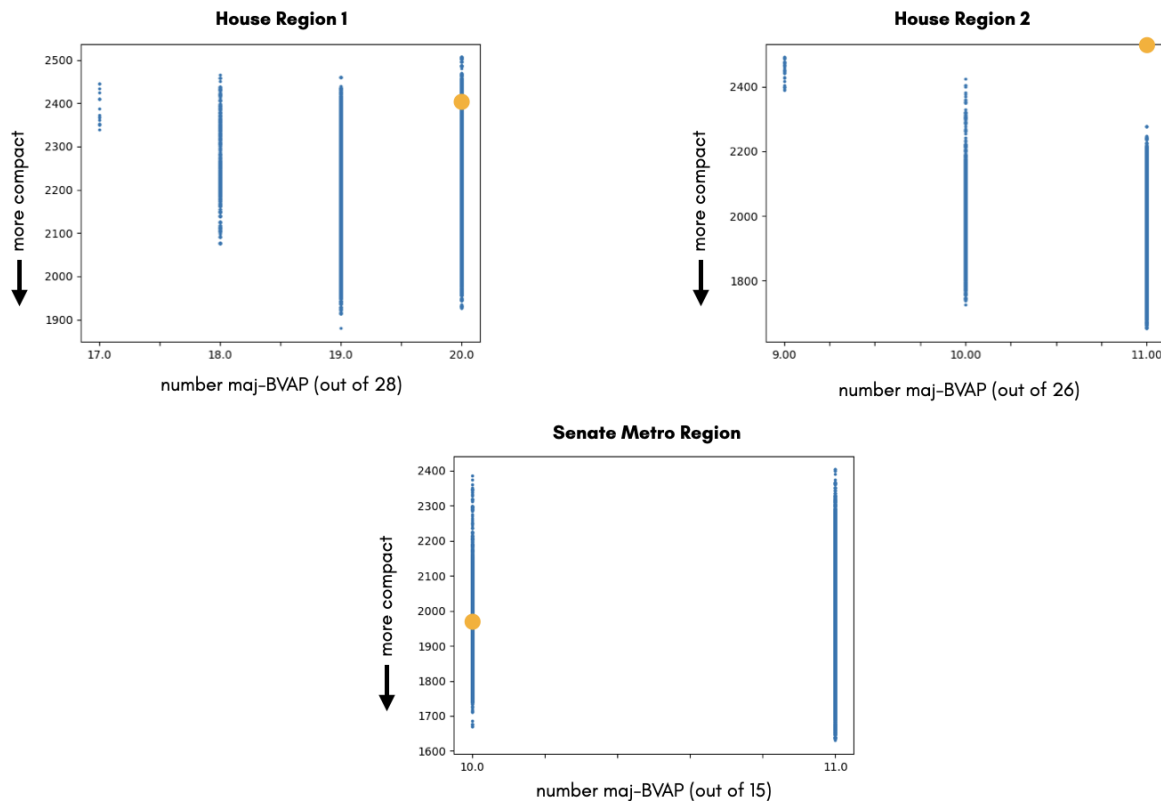


Figure 3: To test the hypothesis in the Morgan report, I generated 100,000 plans in each region with an exploratory algorithm. These runs show no evidence that there is a cost to compactness in matching the number of majority-BVAP districts in the state’s enacted plan; if anything, the correlation goes the other way. Large dots mark the position of the enacted plan on the plot (though in House Region 2, the enacted plan is so much less compact than these alternatives that it is out of range). I am unable to locate the Morgan alternative plan on these plots because it does not cover the same terrain.

## 1.4 Summary discussion of Morgan report

- Comparison to a single alternative plan is plainly inadequate to probe the tradeoffs and incentives in the enacted plan.
- Even though the regions under consideration are composed of whole districts from the enacted plan—28 districts in House Region 1, 26 districts in House Region 2, and 15 districts in Senate Metro Region—Mr. Morgan’s replacement districts do not cover the same terrain. This means that the alternative districts do not have the same collective contour and do not have the same demographics as the districts they replace, so it is not an apples-to-apples comparison.

- Mr. Morgan erroneously concludes from a consideration of his own maps that lower compactness scores are *required* to create additional majority-BVAP districts.<sup>4</sup>
- The Morgan plan for Senate (MorganSD), which is described as being created "blind" to race and ethnicity, has more districts with a majority of voting age population that is Black and Latino (19) than the state's enacted plan (17). The Morgan "blind" Senate plan also has more districts that provide an effective opportunity for Black and Latino voters to elect their candidates of choice (20) than are present in the state's enacted plan (19).

## 2 Discussion of Wright Deposition

In her deposition of January 26, Gina Wright described her work as a mapper drawing the enacted plans for Congress, Senate, and House. She broadly acknowledged that multiple motives were in play, which notably included the pursuit of partisan advantage for the Republican party

Regarding Congressional District 6:

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

A: The desire for [CD 6] was to make it a more politically electable district.

Q: Politically electable for whom?

A: For the party of the people who were drawing the map. (p111, lines 16-23)

And again later:

To my recollection, adding Dawson to CD 6 had to do with the political numbers of the district. That was the only thing. (p120, lines 1-3)

Regarding SD 17:

I think the idea was to draw a district that would be a Republican district. (p178, lines 10-11)

Appeals to partisan advantage are found throughout the transcript, in reference to CD 14, SD 48, HD 104, and in numerous other instances, sometimes justifying the downgrading of other traditional districting principles.

Their statements are consistent with a stance that party, not race, is explanatory of the features found in the enacted plans. In other words, any structural disadvantage to voters of color might be argued to be a mere consequence of the pursuit of partisan advantage for Republicans. To illuminate this possible argument, I will use the same method referenced above in connection with the Morgan Report. I have run an algorithmic procedure that randomly alters districting plans, with a specification favoring plans with more Trump-favoring districts from his Presidential run in 2020.

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<sup>4</sup>For instance, he writes of several districts that "The black percentage is lowered *only* by elongating the district to include lower concentrations of black population. This allows the black population to be redistributed and to create other majority black districts." (repeated verbatim four times ¶30, p23; ¶33, p29; ¶44, p41; and ¶45, p42; emphasis added).



## 2.1 Experiment: Pursuing partisan advantage

I ran a chain of districting plans for 100,000 steps statewide for Congress, Senate, and House using a specification that up-weights plans with more Trump districts according to 2020 voting patterns. From these outputs, I can ask whether plans selected for partisanship—but with no race data—tend to have the same hallmarks of racial sorting that I find in the enacted plans.

Figure 4 sets the table by illustrating that the algorithmic procedure succeeds in securing as much or more partisan advantage (measured by counting districts in which Trump received more votes than Biden in 2020) as the enacted plan, while remaining respectful of traditional districting principles. Compactness is illustrated here, but considerations for population balance and county preservation were also implemented in the runs, as described in Appendix A.

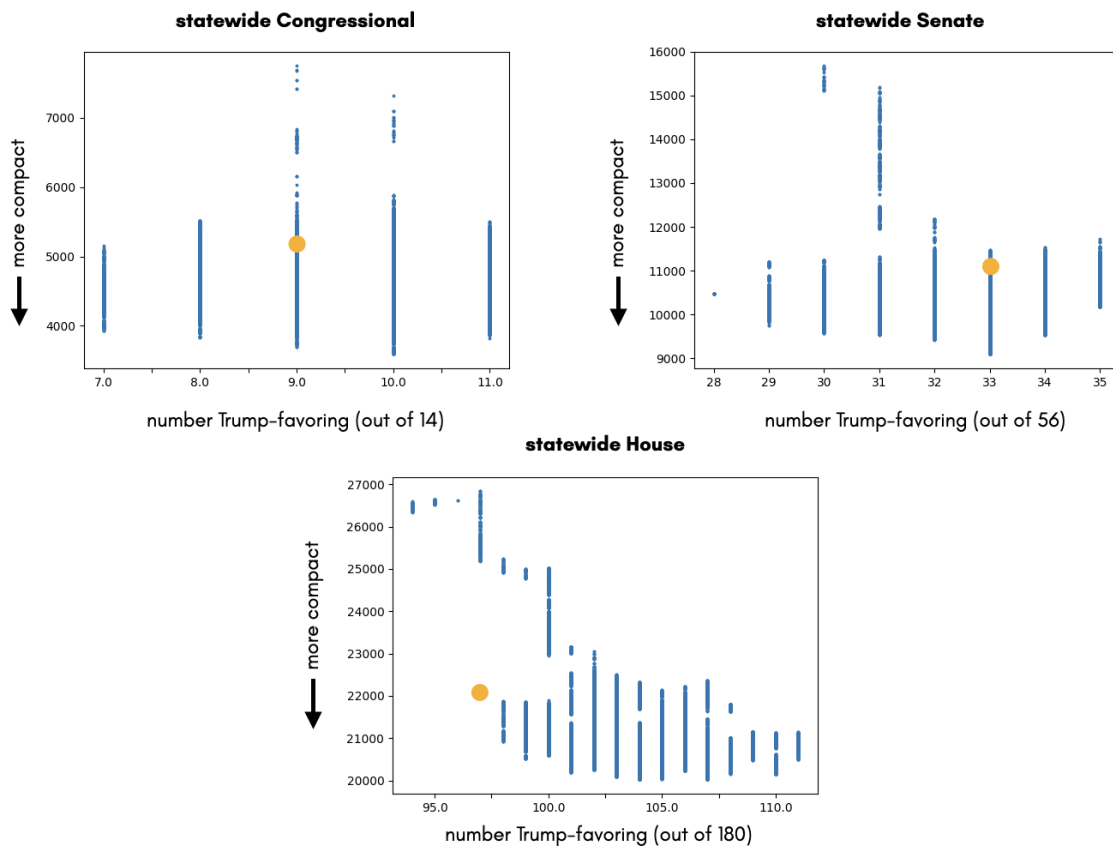


Figure 4: To examine the effects of partisanship, I generated 100,000 statewide plans at each level of redistricting with an exploratory algorithm seeking larger numbers of Trump-favoring districts from the 2020 Presidential election. The enacted plans, marked with large dots in the plots, have 9 Trump-favoring districts in Congress, 33 in the Senate, and 97 in the House. This figure is included to show that the algorithms meet and exceed the partisan performance of the enacted plan while respecting traditional districting principles. The following figures will illustrate the racial features that were used to achieve this on the part of the state.

Next, we examine whether the enacted plan is unusual in its racial balance *among highly partisan alternatives*. To do this, I will focus on the Black voting age population, since this was the principal racial category described by Director Wright as being considered in the mapping process.<sup>5</sup> If a plan were drawn by using minority racial population to secure partisan advantage in a state with roughly 50-50 partisan support, we would expect to see that the districts near the middle range would be "cracked"—the middle range because, all things being equal, these would be the most likely to be contested for political party control in an evenly split state. This would show up on a boxplot with dots below the boxes, perhaps even at or below the whiskers, in the middle columns. That is exactly what we see in Figure 5.

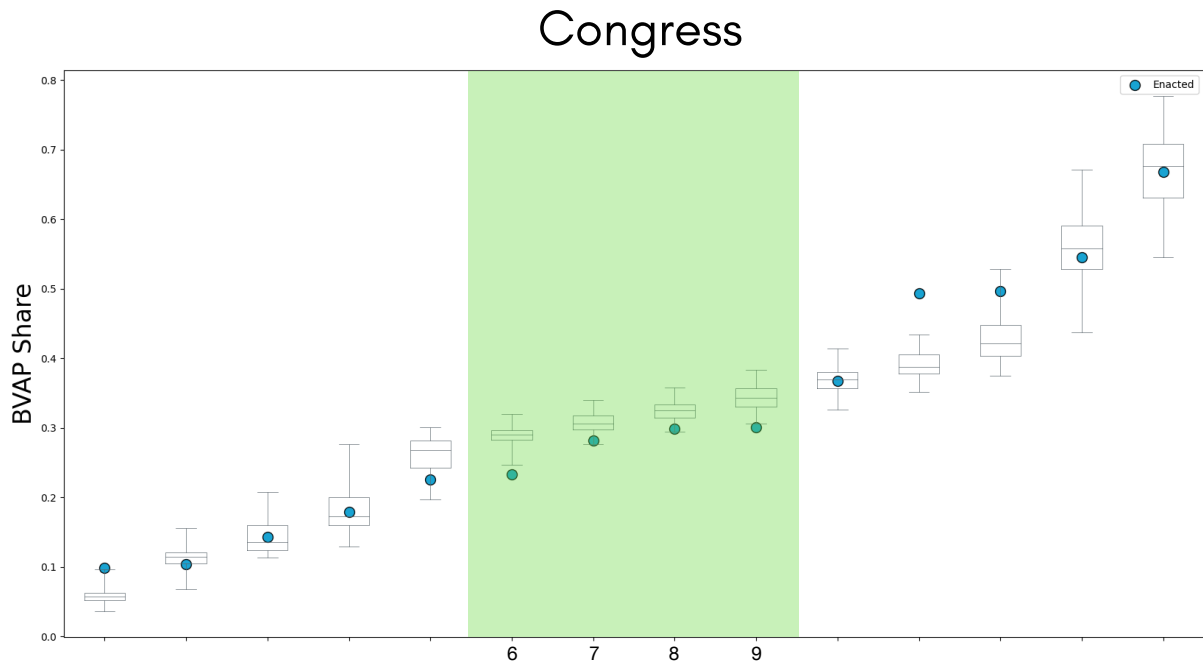


Figure 5: This box-and-whiskers plot organizes the districts of Congressional plans from the one with the lowest BVAP share to the one with the highest, regardless of geography. From 100,000 plans drawn with an emphasis on Republican partisan advantage, the box shows the 25th to 75th percentile, and the whiskers show the 1st to 99th percentile, of the Black voting age population share. The BVAP of districts in the enacted plan is shown with blue dots. Even compared to this collection of partisan plans, we can see that the middle range of districts show clear signs of "cracking," or reduced Black population relative to the comparison plans. This does not suggest a race-neutral pursuit of partisan advantage, but rather a highly race-conscious pursuit of partisan advantage.

<sup>5</sup>"I have not usually combined race categories together to consider it a packing or not packing. From my experience, it has typically been one single race category." (Wright transcript p171, lines 11-14)

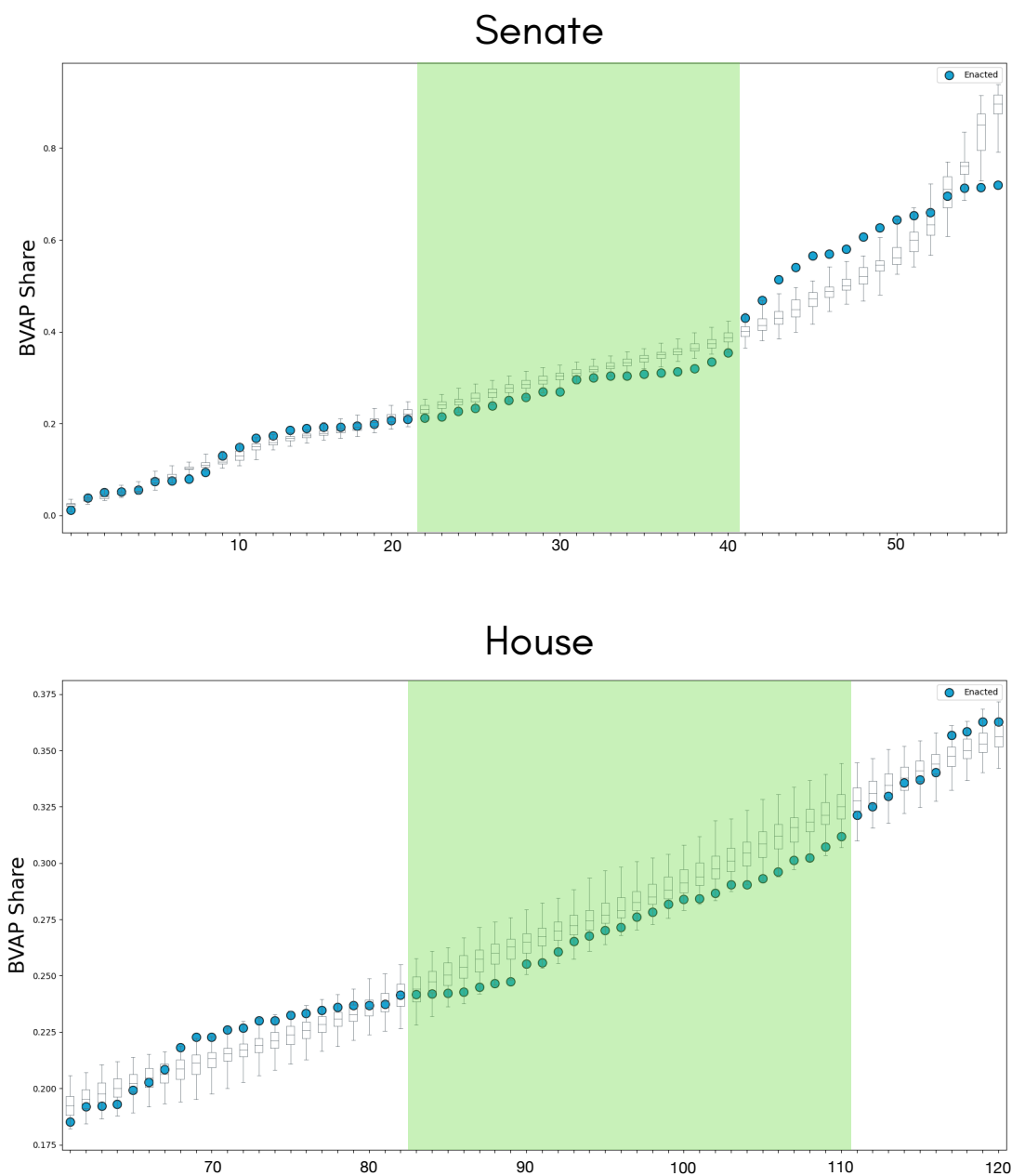


Figure 6: This figure shows boxplots for Senate (top) and state House (bottom; in each, the districts of the plan are arranged from the one with the lowest BVAP share to the one with the highest, regardless of geography. For state House, the middle range of districts is shown. The same signature of cracking is visible here as in the Congressional boxplot.

## 2.2 Summary discussion of race-versus-party experiments

Simple experiments show that the pursuit of partisan advantage may have been a motivation for map-drawers, but many thousands of examples with even more partisan tilt were found. These alternative examples do not show the marked signs of racial sorting that are found in the enacted plan. In a partisan-motivated plan for a 50-50 state, we would expect cracking in the middle range of districts, as discussed above; if that partisanship is pursued aggressively, we would expect it to extend somewhat above the middle range as the controlling party tries for more districts. This is what we see here.

In order to add a quantitative element to the illustrations provided in the figures above, I selected ten random plans from each Trump-favoring collection shown in the boxplots. For Congress, this makes eleven plans—ten randomized alternatives and the enacted plan. In districts indexed 6-9 (highlighted in Figure 5), the relative position of the enacted plan is 1-1-1-1. This means that in all four districts, all ten random plans had a higher BVAP. These order statistics are not probabilistically independent, because they display correlations that are hard to model precisely. However, if variables were drawn in an independently and identically distributed (i.i.d.) fashion, then the probability of being last of eleven values four times in a row would be less than .00007.

I repeated this demonstration in Senate and House, with ten random plans from the Trump-favoring collection, plus the Morgan alternative plan. With the enacted plan, that makes twelve. In the districts indexed 22-40, the relative position of the enacted plan is 1-1-1-1-1-1-1-1-3-2-2-1-1-1-1-1-1. The probability of being last of twelve options this often, if i.i.d., would be less than 0.0000000000000004. Similarly, in the House districts indexed 83-110, the relative position of the enacted plan is 3-1-1-1-1-1-3-2-3-3-4-4-3-3-3-6-2-1-1-1-1-1-1-1-1. The probability of being last of twelve options this often, if i.i.d., would be less than 0.000000000006.

In addition to these ensemble comparisons, we can find corroborating indications that race was operationalized by the mapmakers by considering other elements of the plan, such as the high numbers of split precincts. The enacted House plan splits 352 state precincts, while the random selection of alternatives split no more than 231. The enacted Senate plan splits 144 state precincts, while the alternatives split no more than 74.<sup>6</sup> High levels of precinct splitting is of particular note in a race-versus-party analysis, because vote history is not available at a sub-precinct level.

In summary, I find the enacted plan to have properties associated with the cracking of minority voters, suppressing their numbers in a range of districts in a manner that reduces or eliminates their opportunity to elect candidates of choice. This is consistent with a hypothesis that race was used to achieve partisan outcomes in the state's enacted plans.

---

<sup>6</sup>I am omitting the Congressional comparison, since I did not tune the alternative plans to two-person balance.

## References

- [1] MGGG Redistricting Lab, *GerryChain Python Library*. GitHub Repository. [github.com/mggg/gerrychain](https://github.com/mggg/gerrychain)
- [2] Micah Altman and Michael McDonald, *A Half-Century of Virginia Redistricting Battles: Shifting from Rural Malapportionment to Voting Rights to Public Participation*. University of Richmond Law Review **47** (2013), 771–831.
- [3] Daryl DeFord and Moon Duchin, *Redistricting Reform in Virginia: Districting Criteria in Context*. Virginia Policy Review, Vol. 12 No. 2 (2019), 120–146.
- [4] Daryl DeFord, Moon Duchin, and Justin Solomon, *Recombination: A family of Markov chains for redistricting*. **Harvard Data Science Review**, Issue 3.1, Winter 2021.

## A Description of methods

Randomized alternative districting plans were made with a Markov chain method called *recombination* has been implemented in a publicly available, open-source Python package called GerryChain since 2018 [1] and whose mathematical properties are surveyed in a peer-reviewed article that appeared in 2021 [4].

The basic step begins with a graph representing the geographical units of Georgia, then fuses two districts chosen at random. We draw a random tree (graph with no cycles) that spans the double-district; next, the tree is cut at an edge that creates two complementary balanced pieces, which become the new districts replacing the ones that were fused. The district generation process enforces that every district has population within a thresholded difference to ideal district size; if the tree has no cut edge leaving sufficiently balanced pieces, then a new tree is drawn. (Districts can have up to 1% deviation in Congressional runs and I studied variants with up to 2% deviation and up to 1.5% deviation in Senate and House runs.) Contiguity is also enforced throughout, as a consequence of the fact that deleting an edge from a tree always leaves two connected components, which ensures that new districts formed in the process are connected. Compactness is highly favored throughout this process, because compact districts have far more spanning trees [4]. All of these steps are performed with no attention to race or partisanship—these are only taken into account later in the procedure.

To choose the random tree, a method called *minimum spanning trees* is employed, using weights that encourage county integrity. Within-county edges are given a random weight in  $[0, 1]$  while those between counties receive a weight with a +1 "surcharge." The random tree is chosen by drawing weights from these intervals and then finding the (generically unique) spanning tree of minimum weight. In addition, when that tree is cut to separate new districts, the algorithm first seeks for a between-county edge as the cut, if it is possible within balance constraints. This promotes the selection of spanning trees that restrict to counties in a single connected piece, which will tend to keep counties un-split in the districts. Census blocks were employed as the base unit, and a surcharge exactly like the one described above was used to promote the inclusion of whole precincts.

The method for favoring plans with higher numbers of majority-Black districts (or Trump-favoring districts, respectively) works without any change to the proposal of incremental changes. The only variation is that a weighted coin is then flipped to decide whether to accept a change. If the number of majority-Black or Trump-favoring districts is higher, the change is made with higher probability; if the number decreases, the change may still be accepted, but with lower probability. The parameter controlling this probability is called the *temperature*, and we experiment to find temperature settings that allow for reasonably low rates of rejected proposals. This kind of protocol is standard in MCMC, a leading method in applied statistics, and fits under the umbrella of what are called *heuristic optimization* or *local search* methods.

## B Visual comparison

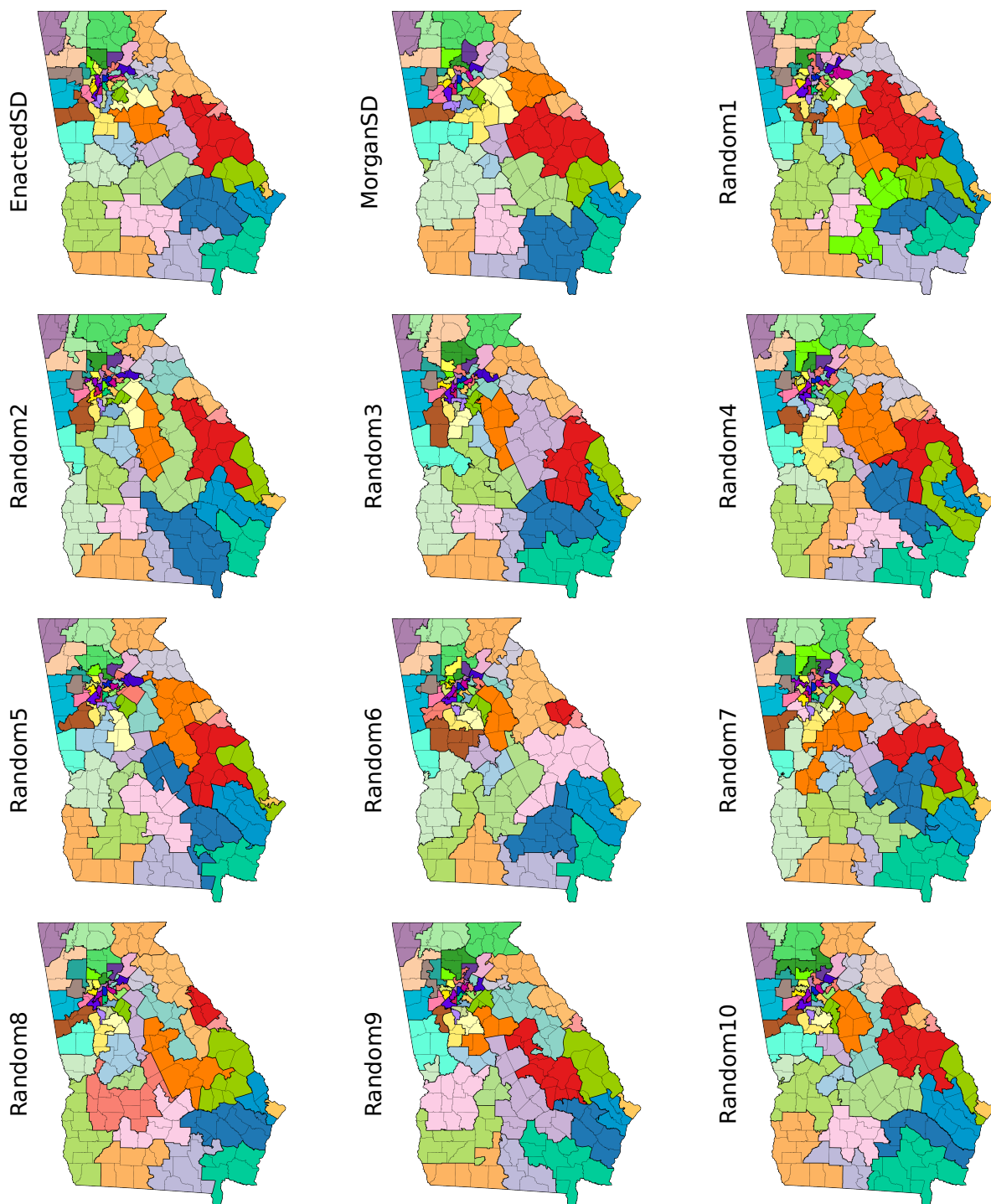


Figure 7: Subsampled Senate plans discussed in §2.2.

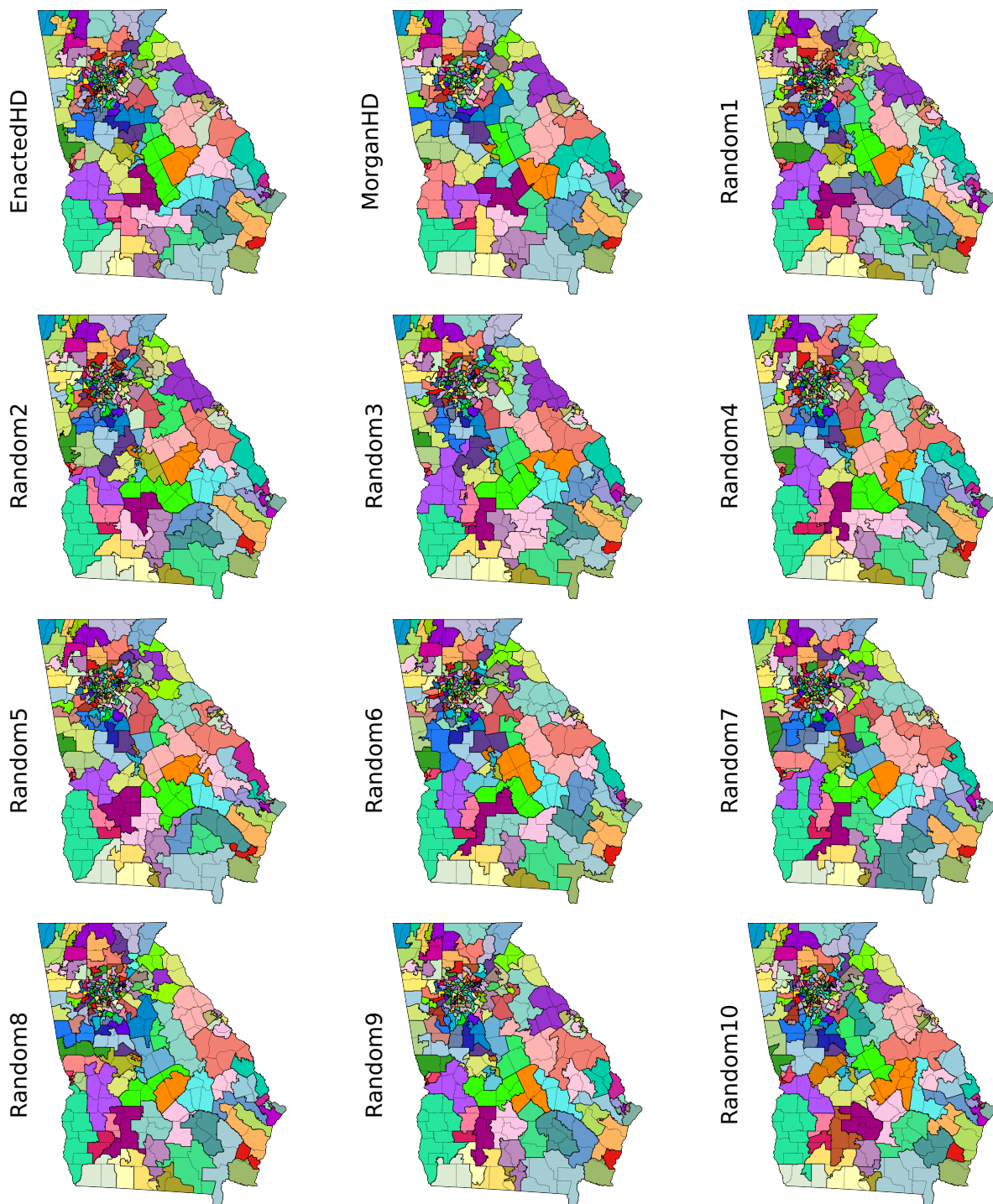


Figure 8: Subsampled House plans discussed in §2.2.



## **C Minor correction to January 13 Report**

In my report filed January 13, 2023, Appendix A on page 81 gives a precise accounting of the construction of racial and ethnic categories throughout the report.

The bullets at the bottom of that page contain minor typographic errors, which are corrected here for clarity and completeness. The corrected version reads as follows:

- Black citizenship ratios are computed by dividing Black-alone CVAP from Table B05003B by Black-alone VAP from Table B01001B.
- Hispanic citizenship ratios are computed by dividing Hispanic CVAP from Table B05003I by Hispanic VAP from Table B03002.
- White citizenship ratios are computed by dividing non-Hispanic White-alone CVAP from Table B05003H by non-Hispanic White-alone VAP from Table B01001H.
- Citizenship ratios for the remaining ("Other") population are computed by dividing CVAP from Tables B05003C (American Indian and Alaska Native alone), B05003D (Asian alone), B05003E (Native Hawaiian and Other Pacific Islander alone), B05003F (some other race alone), and B05003G (two or more races) by VAP from Tables B01001C (American Indian and Alaska Native alone), B01001D (Asian alone), B01001E (Native Hawaiian and Other Pacific Islander alone), B01001F (some other race alone), and B01001G (two or more races).



I reserve the right to continue to supplement my report in light of additional facts, testimony and/or materials that may come to light. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed this 15th day of February, 2023.

  
\_\_\_\_\_  
Moon Duchin

# EXHIBIT 28

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

GEORGIA STATE CONFERENCE  
OF THE NAACP; GEORGIA  
COALITION FOR THE PEOPLE'S  
AGENDA, INC.; GALEO LATINO  
COMMUNITY DEVELOPMENT FUND,  
INC.,

CIVIL ACTION NO.

Plaintiffs,

1:21-CV-5338-ELB-  
SCJ-SDG

vs.

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 DEPOSITION OF ROBERT (ROB) STRANGIA  
APPEARING REMOTE FROM  
ATLANTA, GEORGIA  
FEBRUARY 24, 2023  
11:01 A.M. EASTERN

Reported Remotely By:  
Judith L. Leitz Moran,  
RPR, RSA, CCR-B-2312  
APPEARING REMOTELY

1           If you wanted to draw a district and you  
2       wanted to take a block that was in another district  
3       -- if there was a precinct that was wholly in one  
4       district and you wanted to make it so that precinct  
5       was now split between two districts, you could do  
6       that, right?

7           A       You could split a precinct by the blocks  
8       that are in it. In other words, if you have -- if  
9       there's six blocks in a district or in a district  
10      -- six blocks in the precinct, and you wanted three  
11      of the -- half of that precinct to be in one  
12      district, half in the other, you could do it but  
13      you'd have to follow the block boundaries.

14          Q       Okay. Great. That's a much better way  
15      of saying what I was trying to say, so thank you.

16          And I -- just for the record, were you  
17      ever present when legislators reviewed maps with  
18      LCRO employees or anyone else in person or by Zoom  
19      or any other conferencing application?

20          A       No.

21          Q       Okay. All right. I -- I want to move on  
22      to another topic.

23                    You create -- is it true that you create  
24      a custom -- you have a formula that translates  
25      precinct level election results and voter

1 registration to block level election -- to the  
2 block level for Maptitude?

3 A Well, it's not really -- it's not a --  
4 it's not a formula, but there is a method to do  
5 that, yes.

6 Q Okay. I'm going to -- I'm going to  
7 introduce another exhibit.

8 A Sure.

9 (Deposition Exhibit 3 marked.)

10 BY MR. DAVIS:

11 Q Okay. Screen Share.

12 Can you see this document? I'm going to  
13 make it a little bit bigger for you.

14 A Yeah, please make it bigger.

15 Q Is this okay or should I zoom in some  
16 more?

17 A That's okay, but give me a minute to see  
18 what this is.

19 Q Okay. Let me know when you want me to  
20 scroll, okay?

21 A Okay. Yeah, I'm familiar with this  
22 document. Yep, okay.

23 Q Okay. This is -- so this reflects an  
24 email that you sent. This -- this first -- this  
25 bottom part here reflects an email that you sent to

1 Gina Wright and Brian Knight titled Job  
2 Responsibilities, right?

3 A Yes.

4 Q And you sent that on Wednesday,  
5 April 28th, 2021?

6 A Yes.

7 Q And do you see the middle paragraph here  
8 that states "My GIS" -- starts with "My GIS  
9 Database Administration"?

10 A Yes.

11 Q You see the sentence -- you say: "much of  
12 this, especially the building and merging of our  
13 Election Database with Census Data, would be  
14 extremely difficult to teach to anyone."

15 Do you see that?

16 A Yes.

17 Q When you say the building and merging of  
18 our election database with census data, what --  
19 what do you mean by that?

20 A So we get election data from the  
21 Secretary of State at the precinct level or for  
22 precinct layer of geography. So we're consistent  
23 here.

24 And it -- what's called -- through  
25 Maptitude can allocate election and registration

1 data to blocks based on the voting age population  
2 of those blocks.

3 So it's an estimate, it's not -- it's --  
4 you know, it's not -- you know, it's not true data,  
5 it's just -- it's just an estimate.

6 Q So -- so how does -- how does -- how does  
7 the allocation work?

8 A Okay. So you have the precinct, which is  
9 not a census unit of geography, but you can only  
10 build legislative districts by using census  
11 geography.

12 And the -- keep in mind that election  
13 results are captured by precinct level. So a  
14 precinct can have -- you know, you can have a dozen  
15 blocks in it.

16 Q Uh-huh.

17 A So with the blocks you would have no way  
18 of knowing, any of those blocks, you would have no  
19 way of knowing the registration data or election  
20 results for any of those blocks in there because  
21 the data was not collected at those.

22 So at the process in Maptitude and I  
23 think it might have been referring to with formula,  
24 it's more of a process.

25 But when it's allocated through Maptitude

1 you can choose how to allocate that data to the  
2 block.

3 So, for instance, let's just make it  
4 simple, let's say a block has -- or let's say a  
5 precinct only has two blocks in it, but 60 percent  
6 of the population -- of the voting age population  
7 is in one of the blocks but only 40 percent of the  
8 voting age population is in the other blocks.

9 So the voting and registration data will  
10 be allocated to those blocks based on the voting  
11 age population.

12 So it's a guess. You don't know if --  
13 you don't know if the 40 -- the people that all  
14 live in the 40 percent, you don't know if -- you  
15 really don't know if all the Republicans would live  
16 on one side and all the Democrats would live on  
17 other side, you wouldn't know that. This is just  
18 doing it based on voting age population.

19 Q Okay. So just so I understand, the  
20 precinct has an overall partisan break --  
21 breakdown, right? So let's say it's 50/50.

22 A Yes.

23 Q And what -- and what Maptitude would do  
24 is it would assume that each of the blocks has that  
25 same breakdown, right?



1       Republicans?

2               A       Uh-huh.

3               Q       So if you were trying to maximize a  
4       Republican district, for example, you wouldn't be  
5       able to do that by moving a block from a precinct  
6       into another district at -- because you wouldn't  
7       be -- you know, accurately it would be hard to tell  
8       what the actual political makeup of that block is,  
9       right?

10              A       Yeah.   If you're trying to move an  
11       individual block, that's really not accurate --  
12       it's not accurate trying to move an individual  
13       block.

14                    You know, larger levels of geography,  
15       yes, but not at the block level is not -- it's not  
16       -- it's -- it's an estimate.

17              Q       And you have -- but if you were trying to  
18       move people based on race, that exists at the block  
19       level, right?

20              A       Yes, it does.

21              Q       So you would know exactly how many people  
22       of a particular race are in -- are in the block?

23              A       Yes, you would.

24                    MR. DAVIS:   Okay.   We've been going for  
25       another hour.   It's about 45 minutes.   Can we take

1 Q And what is the Jungle U.S. Senate  
2 Election?

3 A That was the special -- the special  
4 senate election that was held during the general  
5 election. That's where it was no -- there was no  
6 political party candidate, it was just the -- the  
7 special election.

8 Q And what do you mean by "we would need  
9 them to fix the Congress, House, and Senate data"?

10 A That they didn't -- they didn't zero out  
11 the data like we had requested for the noncontested  
12 house, senate and congressional races.

13 Q Okay. I'm going to get off this for a  
14 second. Whoops, that didn't work.

15 (Deposition Exhibit 7 marked.)

16 BY MR. DAVIS:

17 Q I'm going to introduce another document.  
18 Can you see this document?

19 A Yes.

20 Q I'll give you a little bit of time to  
21 read it. Let me know when you're ready.

22 A Yep.

23 Okay. Yep, I got it.

24 Q Okay. Great. So this is an email dated  
25 August 25th, 2021, right?

1 A Yes.

2 Q From you to Gina Wright, Brian Knight,  
3 Dan O'Conner, Maggie Wigton and Gabe Mesriah?

4 A Yeah, that's -- that's our entire office.

5 Q So all those -- all those people work for  
6 the Legislative Congressional Reapportionment  
7 Office?

8 A At that time, yes.

9 Q At the time. And here you state that  
10 you've "attached the list of formula fields that I  
11 used to allocate the 2020 Election Data into the  
12 TIGER2020 Geography"?

13 A Yes.

14 Q Is that allocation process the allocation  
15 process we were talking about earlier from --

16 A Yes, it is.

17 Q And you say so all of the Election Data  
18 Fields were allocated using 2020 VAP data?

19 A Yes.

20 Q What do you mean -- do you see this last  
21 sentence here when you say: "For example, BLREG20  
22 (Black Registration) was allocated by BLACK VAP,  
23 and HREG20 (Hispanic Registration) was allocated by  
24 HISPANIC VAP."

25 What do you mean by that?

1           A       So -- well, as we discussed earlier, when  
2       we're allocating the data down we're using voting  
3       age population.

4                   For those fields, it's more accurate to  
5       allocate it by -- the Black registration by -- by  
6       the BLACK VAP, and the Hispanic by the HISPANIC VAP  
7       and, you know, so forth, so.

8           Q       What do you mean by "allocate it by BLACK  
9       VAP," I guess, is my question?

10          A       Well, because we -- well, as we discussed  
11       earlier, the precinct -- the voter registration  
12       data is at the precinct level.

13          Q       Uh-huh.

14          A       And we're -- we're trying to estimate  
15       what this is at the block level.

16                   So when you're allocating the election  
17       data using the voting age population with the  
18       registration data, it's the same thing except with  
19       the -- the different races you can allocate it --  
20       you know, I'm trying to be as accurate as possible.

21                   So it's more accurate to allocate Black  
22       registration by BLACK VAP and Hispanic by HISPANIC  
23       VAP when you're trying to allocate from the  
24       precinct geography down to the block level  
25       geography.

C E R T I F I C A T E

Deposition of: ROBERT (ROB) STRANGIA

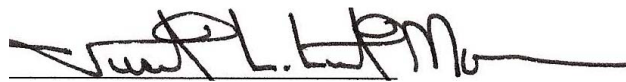
Date of Deposition: FEBRUARY 24, 2023

STATE OF GEORGIA:

I hereby certify that the foregoing transcript was stenographically recorded by me via Zoom as stated in the caption. The deponent was duly sworn to tell the truth, the whole truth, and nothing but the truth. And the colloquies, statements, questions and answers thereto were reduced to typewriting under my direction and supervision and the deposition is a true and correct record, to the best of my ability, of the testimony/evidence given by the deponent.

I further certify that I am not a relative or employee or attorney or counsel to any of the parties in the case, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in the action.

This, the 14th day of March 2023.

A handwritten signature in black ink, appearing to read "Judith L. Leitz Moran", written over a horizontal line.

Judith L. Leitz Moran, CCR-B-2312  
Registered Professional Reporter

# EXHIBIT 29

## Report on Racial Bloc Voting in Georgia

Thomas L. Brunell, Ph.D

I am a Professor of Political Science at the University of Texas at Dallas. I received a Ph.D. in Political Science from the University of California, Irvine in 1997. Currently I serve as the program head for the Political Science program and I have previously served as Senior Associate Dean for the School of Economic, Political, and Policy Sciences here at UT Dallas. Last year, I was appointed by the Director of the U.S. Census Bureau to serve a three-year term on the Census Scientific Advisory Committee. My teaching and research interests revolve around American elections. I study redistricting, representation, political parties and the U.S. Congress. I teach classes on Election Law, Redistricting and Racial politics, Campaigns and Elections, and Congress. I have published a book on redistricting and dozens of peer-reviewed articles in the top journals in our field on redistricting, the Voting Rights Act, elections, and representation.

I was asked by counsel to evaluate the extent to which racial bloc voting was present in recent elections in the state of Georgia prior to the start of the redistricting effort. This is to help the state comply with the Voting Rights Act with respect to when and where majority minority districts ought to be drawn in the state.

I used two recent elections that pitted an African American Democrat against a white Republican in a statewide election. This type of election is appropriate to detect the presence of racially polarized voting. We are interested specifically in the second and third prong of the Gingles test (*Thornburg v. Gingles* (1986)) which ask whether the racial minority vote as a bloc and whether the white majority votes as a bloc and is usually able to defeat the minority preferred candidate.

The two elections I use are the 2018 Gubernatorial election in which Brian Kemp (50.2 percent) defeated Stacey Abrams (48.8 percent), and the 2021 Senatorial run-off in which Raphael Warnock (51 percent) defeated Kelly Loeffler (49 percent).

First, I will use several standard statistical tools for detecting racially polarized voting looking at the statewide data – homogeneous precinct analysis, scatterplot, and ecological regression. Then I will use the same tools for the data from 13 separate counties in Georgia (Cobb, Chatham, Clayton, DeKalb, Dougherty, Douglas, Fulton, Gwinnett, Henry, Lowndes, Muscogee, Richmond, and Rockdale).

## Data

The unit of analysis for this type of analysis is the voting precinct. This is the smallest level of geography we can use in which we have actual vote totals combined with racial

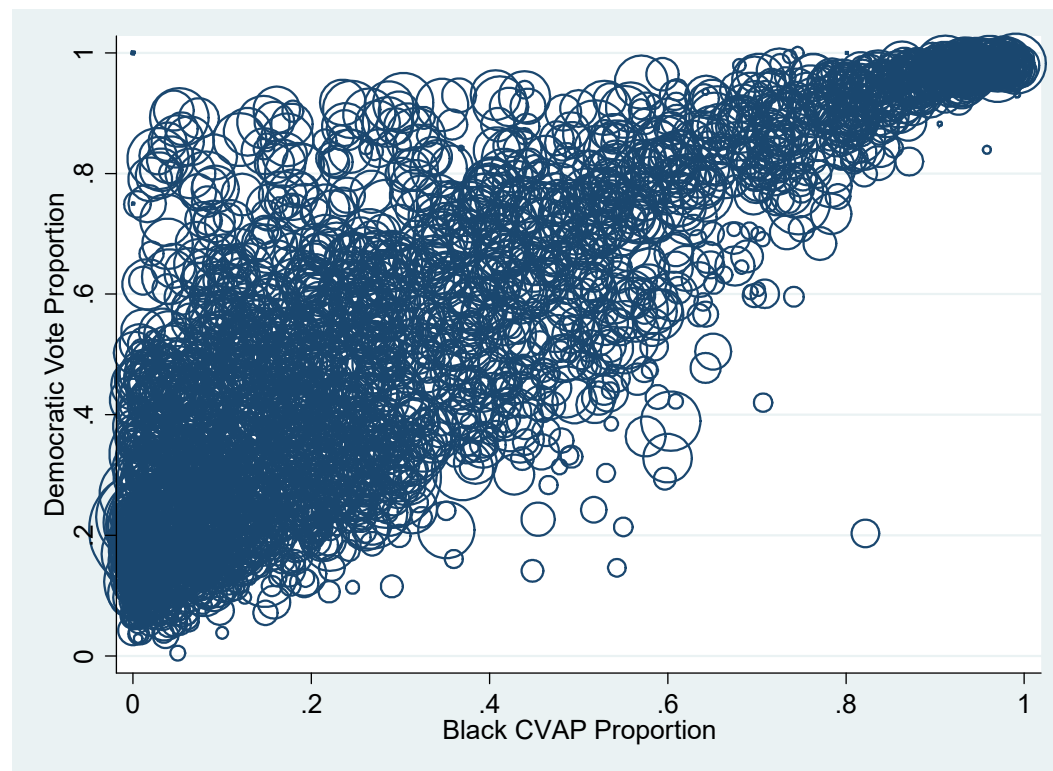
data. The election data were provided to me by counsel and I believe they are from the Secretary of State's office. The demographic data are.....

### Statewide Analysis

The first tool used is a simple scatterplot of the Black Citizen Voting Age Population (CVAP) proportion and the proportion of the vote for the African American candidate. If there is a relationship between the proportion of African Americans in a precinct (horizontal axis) and the proportion of the vote (vertical axis), we should see a most of the data in the lower left quadrant (low Black CVAP and low vote for Black candidate) and the upper right quadrant (high Black CVAP and high vote for Black candidate).

### 2021 Senate Run-off Election, Warnock/Loeffler

Figure 1. Scatterplot of Democratic Vote Proportion and Black Citizen Voting Age Proportion, 2021 Senate Run-off Election, Statewide Data



Each circle represents a single Georgian voting precinct – the size of the circle indicates the number of votes cast – larger circles are bigger precincts than smaller circles. Markers to the left of the graph have low proportion of Black citizens of voting age and as we move to the right, the precincts are more heavily populated by African Americans. The vertical axis is the proportion of the vote cast in the precinct for Warnock. So those nearer to the bottom cast most of their votes for Loeffler, but those near the top heavily supported Warnock. Most of the precincts with very low proportion of Black citizens of



voting age overwhelmingly supported Loeffler, though certainly not all of them. There are some precincts with very low black population that also heavily voted for Warnock. For precincts that are heavily Black, the support for Warnock is clear and with one or two exceptions, all vote majority Warnock. This pattern is indicative of racially polarized voting. There is evidence of white support for Warnock in some districts, so we need some further analysis to better understand what is going on.

### **Homogeneous Precinct Analysis**

There are 195 precincts that are at least 90 percent Black CVAP in the data for this election. The average vote percentage in these precincts is 97.3 percent for Raphael Warnock. There are 384 precincts with at least 90 percent Non-Hispanic White CVAP and among these precincts the average percent of the vote is 19.9 percent for Warnock. This is indicative of racially polarized voting in the state of Georgia.

### **Ecological Regression Analysis**

Lastly, we use data from all precincts in the state to test the relationship between percent of the population made up by Whites, Blacks, and Hispanics, to the level of support for the Democratic candidate. This is called ecological regression in the literature. This establishes a linear relationship between these variables.

There are 2,650 observations for the regression and the estimates derived from the analysis indicate 22.5 percent of White voters supported Warnock, 100 percent of Black voters supported Warnock, and 100 percent of Hispanic voters supported Warnock. All of the results are statistically significant. The estimates of every Black and Hispanic voter supporting Warnock is obviously an over-estimate. There are some voters from both of these racial/ethnic groups that voted for Loeffler, but results like the ones from this analysis are very typical when a minority group overwhelmingly supports one particularly candidate.

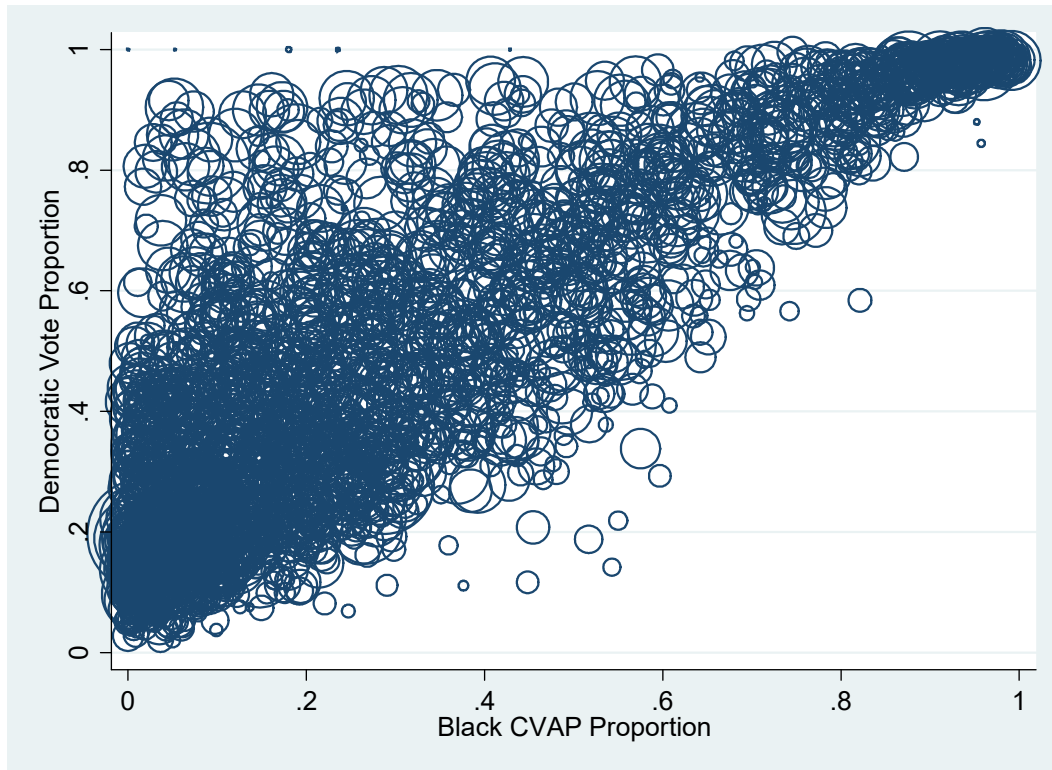
### **2018 Abrams/Kemp Gubernatorial Election**

Next, I will examine the extent to which voting is polarized by race statewide in Georgia using the 2018 governors' race. In this election Brian Kemp narrowly beat Stacey Abrams.

#### **Homogeneous precincts**

There are 186 precincts that are at least 90 percent Black CVAP in the data for this election. The average vote percentage in these precincts is 97.6 percent for Stacey Abrams. There are 382 precincts with at least 90 percent Non-Hispanic White CVAP and among these precincts the average percent of the vote is 17.8 percent for Stacey Abrams. This is indicative of racially polarized voting in the state of Georgia

Figure 2. Scatterplot of Democratic Vote Proportion and Black Citizen Voting Age Proportion, 2018 Gubernatorial Election



### Ecological Regression Analysis

There are 2,608 precincts in this regression. The estimate for support for Abrams among white voters is 18.97 percent. The estimates for Blacks and Hispanics is again 100 percent. Again, this is an overestimate of the support among these groups, but we can be sure that both groups supported Abrams overwhelmingly. This indicates clear racially polarized voting statewide in this election.

## County Based Analysis

Next, I am going to look at the following 13 counties separately, using the same techniques as above: Cobb, Chatham, Clayton, DeKalb, Dougherty, Douglas, Fulton, Gwinnett, Henry, Lowndes, Muscogee, Richmond, and Rockdale.

### 2021 Warnock v. Loeffler

#### Homogeneous Precinct Analysis

Table 1. Percent of vote for Warnock in Homogenous Precincts, 2021 Run-off Election

	90%+ BCVAP	90%+ WCVAP
Cobb		35.6% 6 precincts
Chatham	97.5% 9 precincts	36.0% 14 precincts
Clayton	96.4% 6 precincts	
DeKalb	97.3% 53 precincts	62.9% 4 precincts
Dougherty	96.8% 10 precincts	
Douglas		
Fulton	97.5% 110 precincts	46.8% 26 precincts
Gwinnett		42.5% 1 precinct
Henry		
Lowndes		
Muscogee	95.3% 1 precinct	
Richmond	97.2% 4 precincts	20.6% 1 precinct
Rockdale		

\*entries indicate the percent of the vote for Raphael Warnock and the number of precincts in each county that are 90 percent or more Black CVAP and Non-Hispanic White CVAP. Black entries indicate no homogeneous precincts exist in the county for that group.

In the seven counties that have homogeneous Black precincts, each one indicates overwhelming support for the Black candidate. The average for each of the counties is over 95 percent for Warnock. Among the six counties with homogenous Non-Hispanic White precincts, five of them indicate majority support for Loeffler, and one (DeKalb County) shows majority support for Warnock among these voters. DeKalb County notwithstanding, this indicates widespread racially polarized voting in Georgia.

Table 2. Ecological Regression Analysis for 2021 Warnock/Loeffler Race, select counties.

	White estimate	Black Estimate	Hispanic Estimate	Number of Observations
Cobb	36.3	100	86.0	145
Chatham	30.2	100	100	92
Clayton	32.4	100	100	65
DeKalb	66.6	100		191
Dougherty	10.1	100		28
Douglas	23.9	100		25
Fulton	48.9	100	100	379
Gwinnett	34.2	100	100	156
Henry	29.3	100		37
Lowndes	3.0	100		13
Muscogee	22.8	100		25
Richmond	22.8	100	100	68
Rockdale	20.4	100	75.1	16

In each of the counties, except one, a majority of the white voters voted for Loeffler. The estimate for DeKalb indicates 2 out of 3 white voters voted for Warnock. The estimates range from a low of 3 percent in Lowndes county up to the 66.6 in DeKalb. Most of the estimates are in the 20-30 percent range. For all the included counties, the regression estimates for Black support of Warnock are above 100 percent (I round down to 100 percent in these cases). Given the small sample sizes and the relatively smaller number of Hispanics in these counties, I am only able to get statistically significant estimates of the Hispanic support for Warnock in seven of the counties. All indicate overwhelming majority support for Warnock. These are all typical results for racially polarized voting.

Figure 3. Scatterplot Cobb County

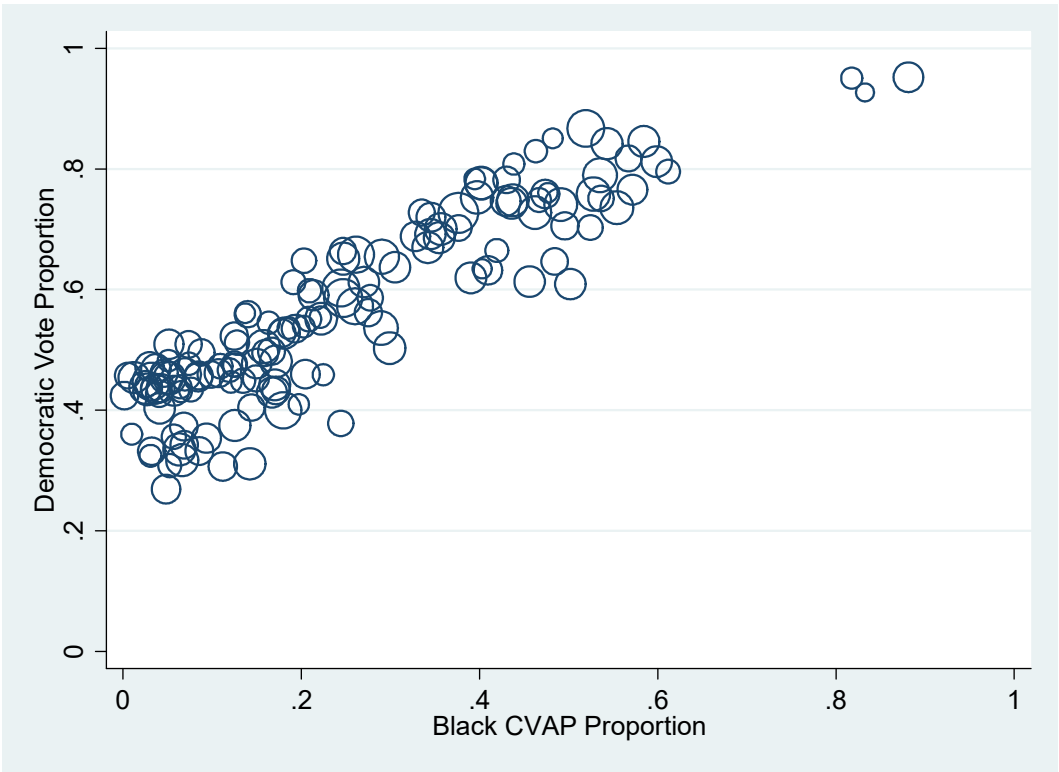


Figure 4. Scatterplot Chatham County

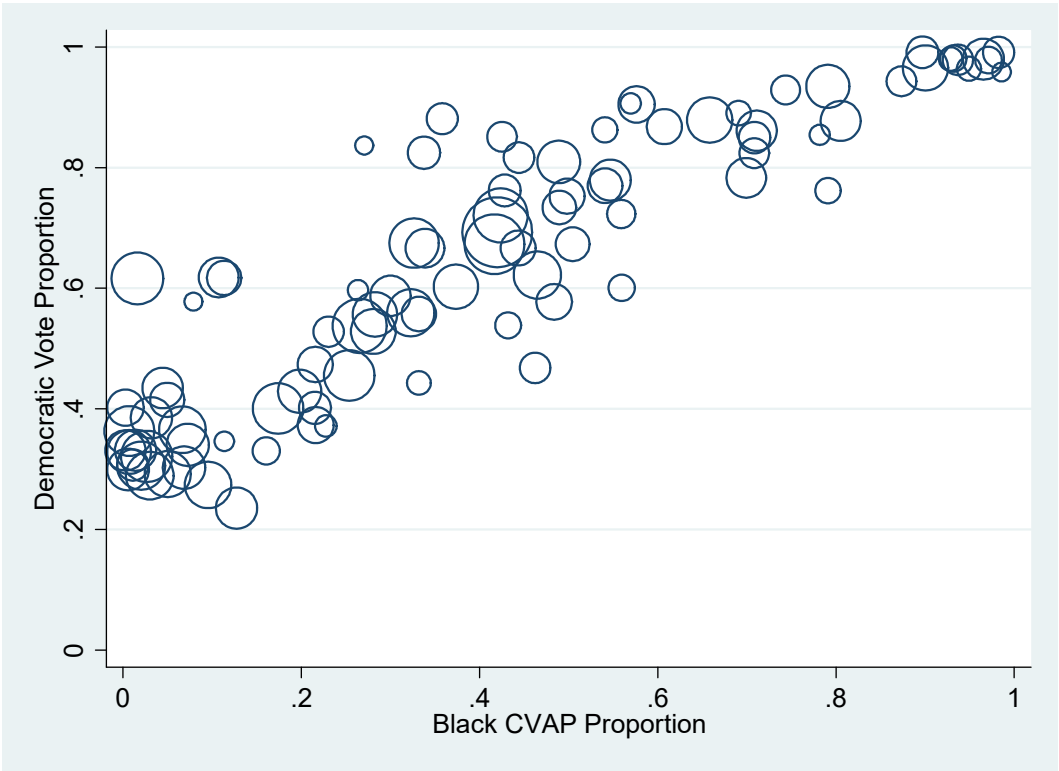


Figure 5. Scatterplot Clayton County

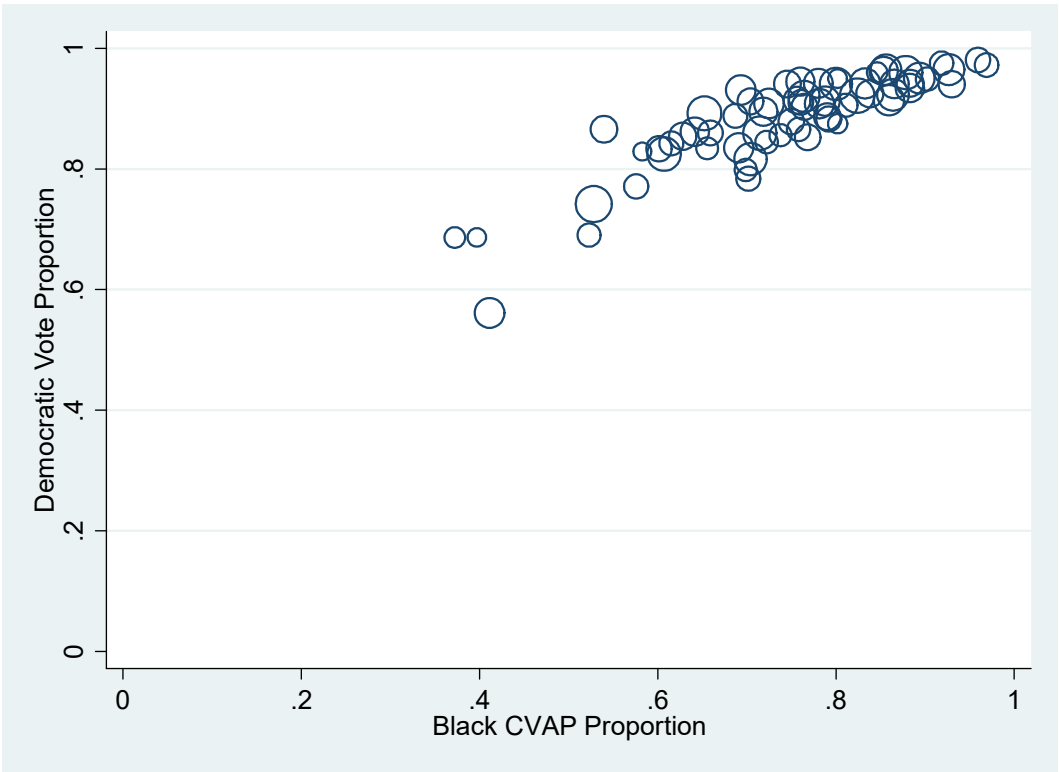


Figure 6. Scatterplot DeKalb County

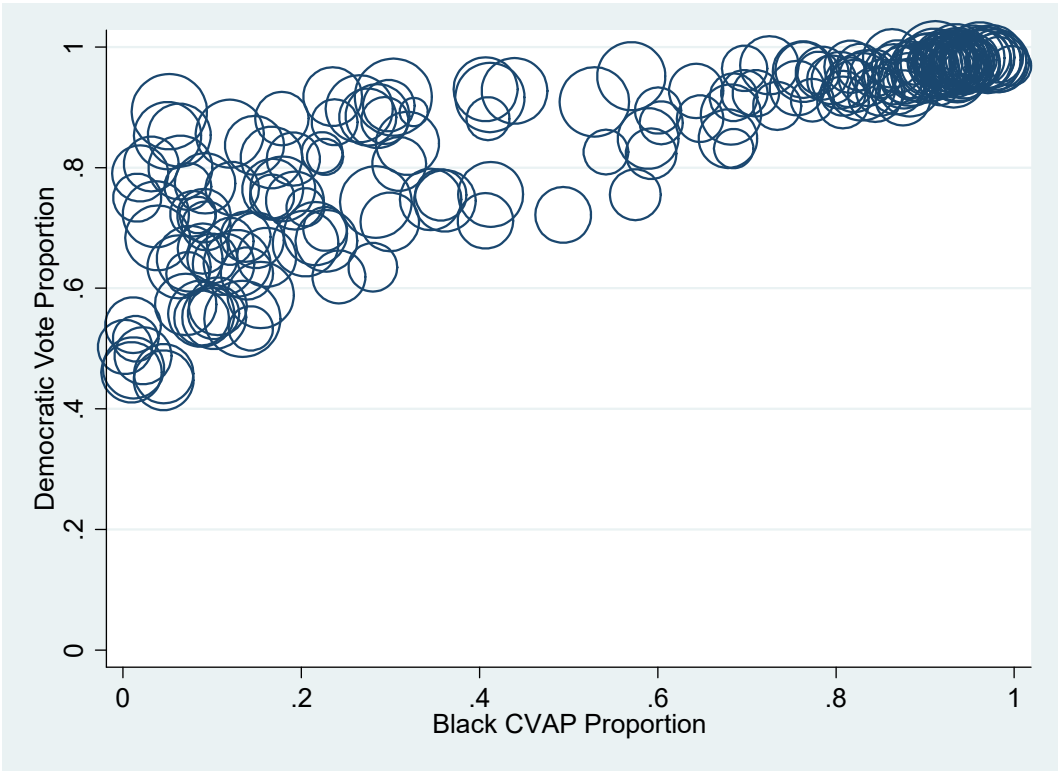


Figure 7. Scatterplot Dougherty County

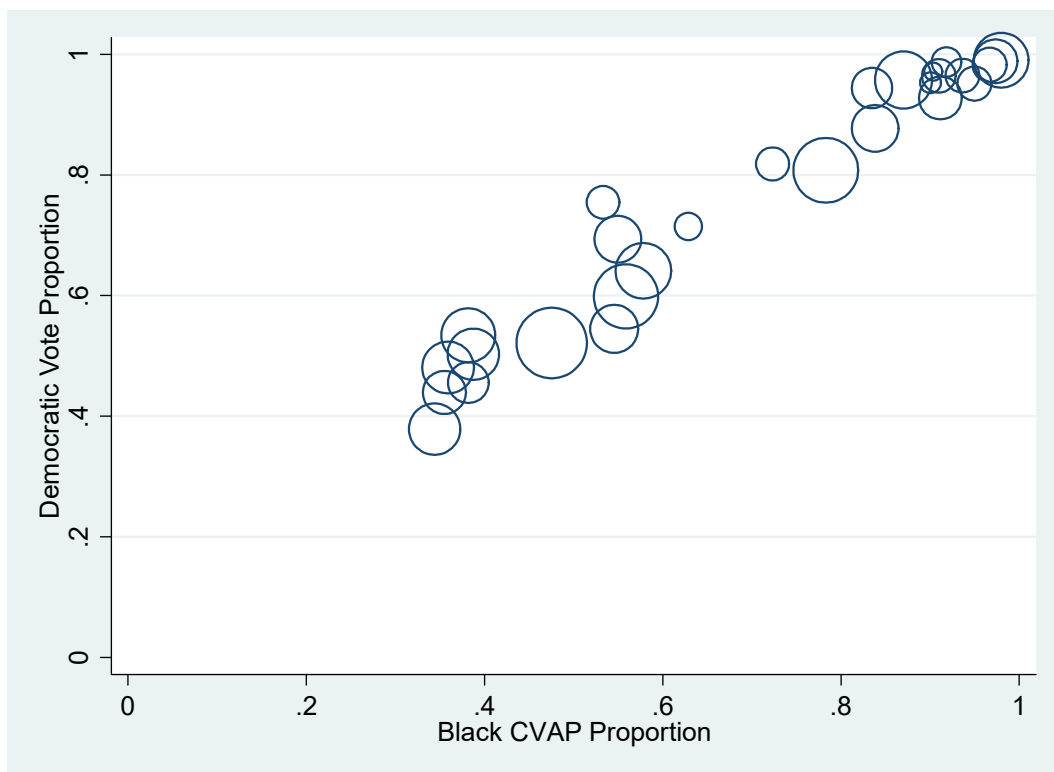


Figure 8. Scatterplot Douglas County

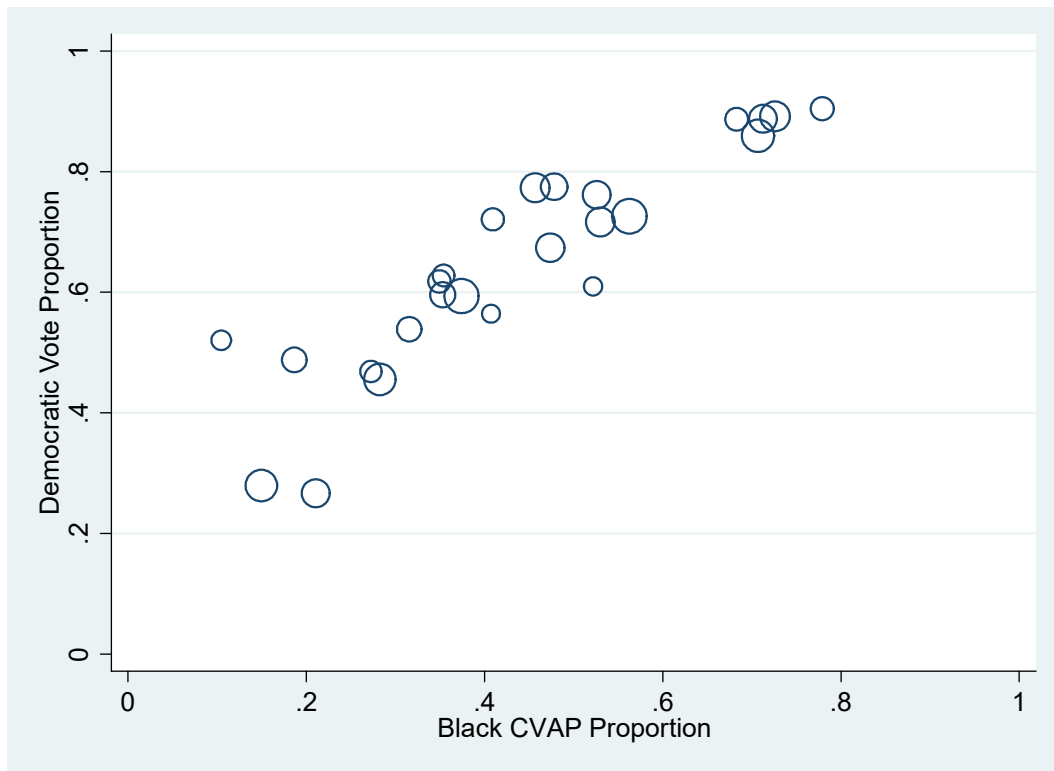


Figure 9. Scatterplot Fulton County

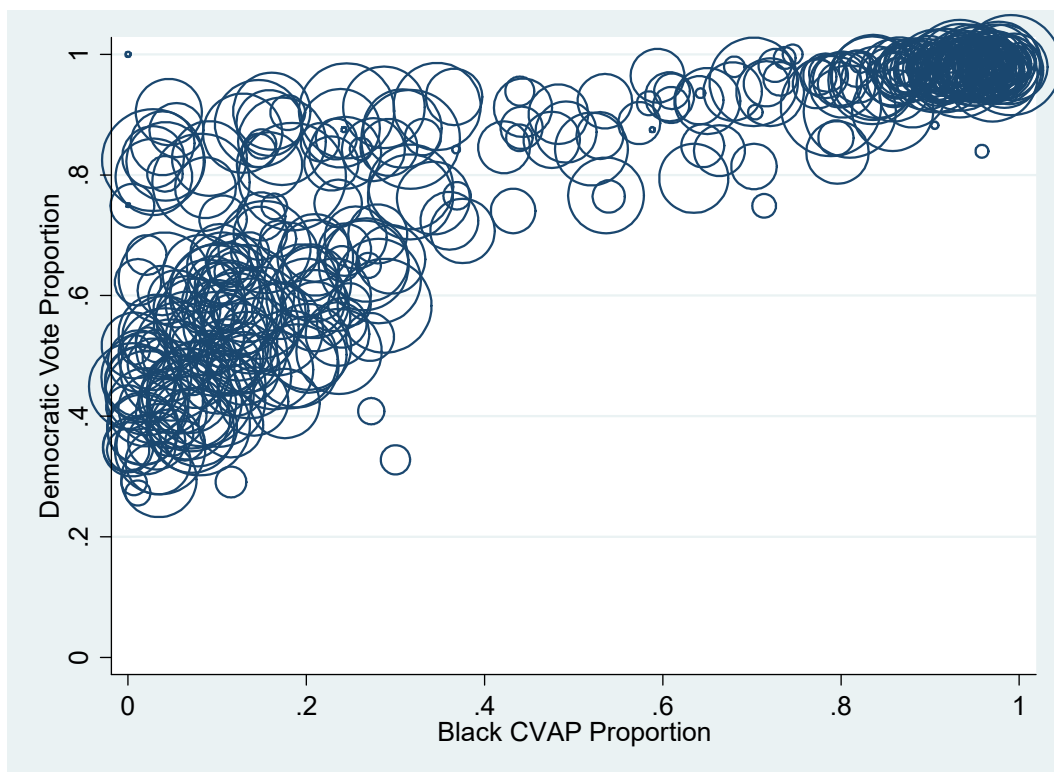


Figure 10. Scatterplot Gwinnett County

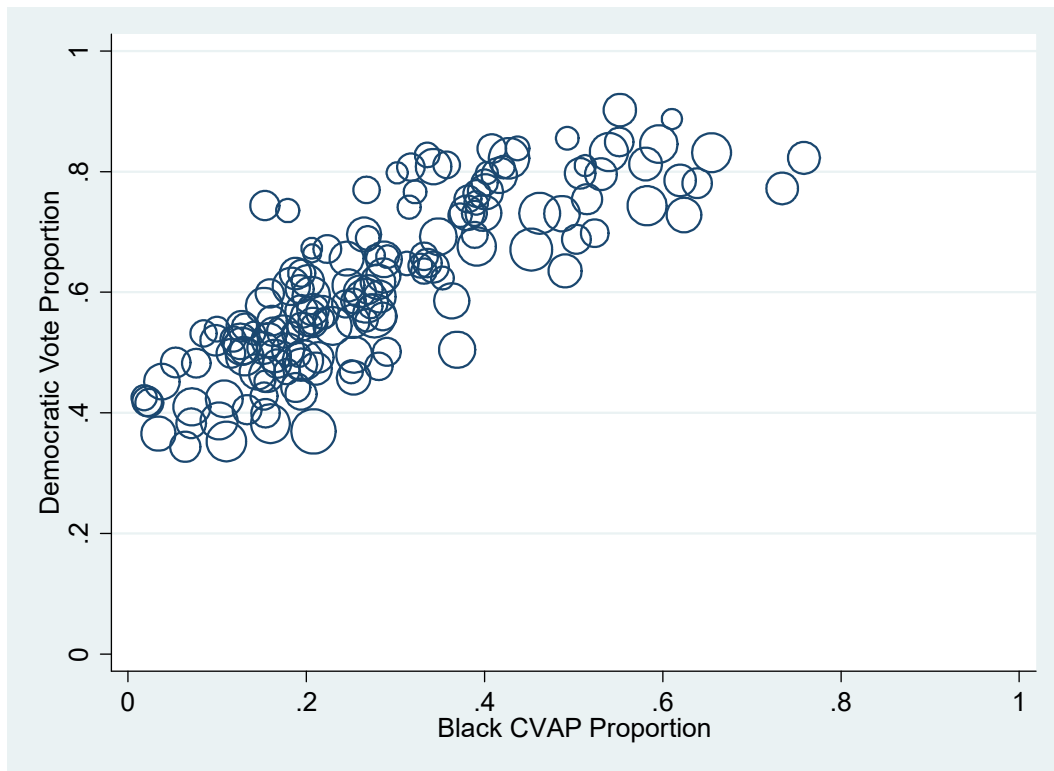




Figure 11. Scatterplot Henry County

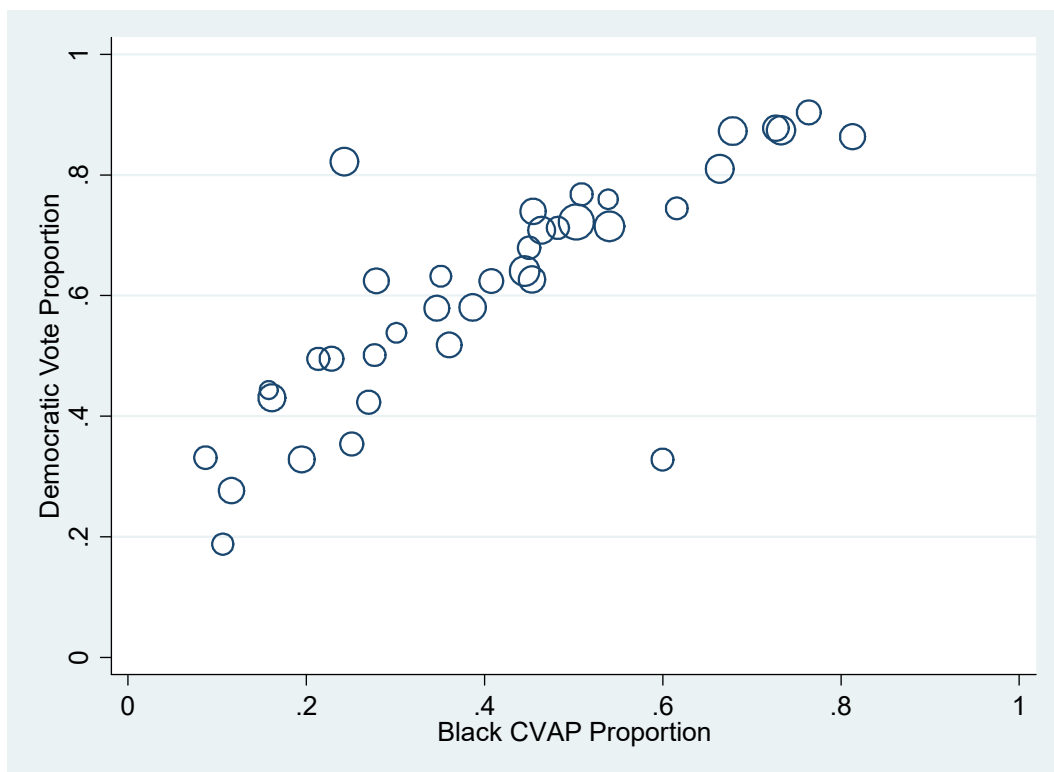


Figure 12. Scatterplot Lowndes County

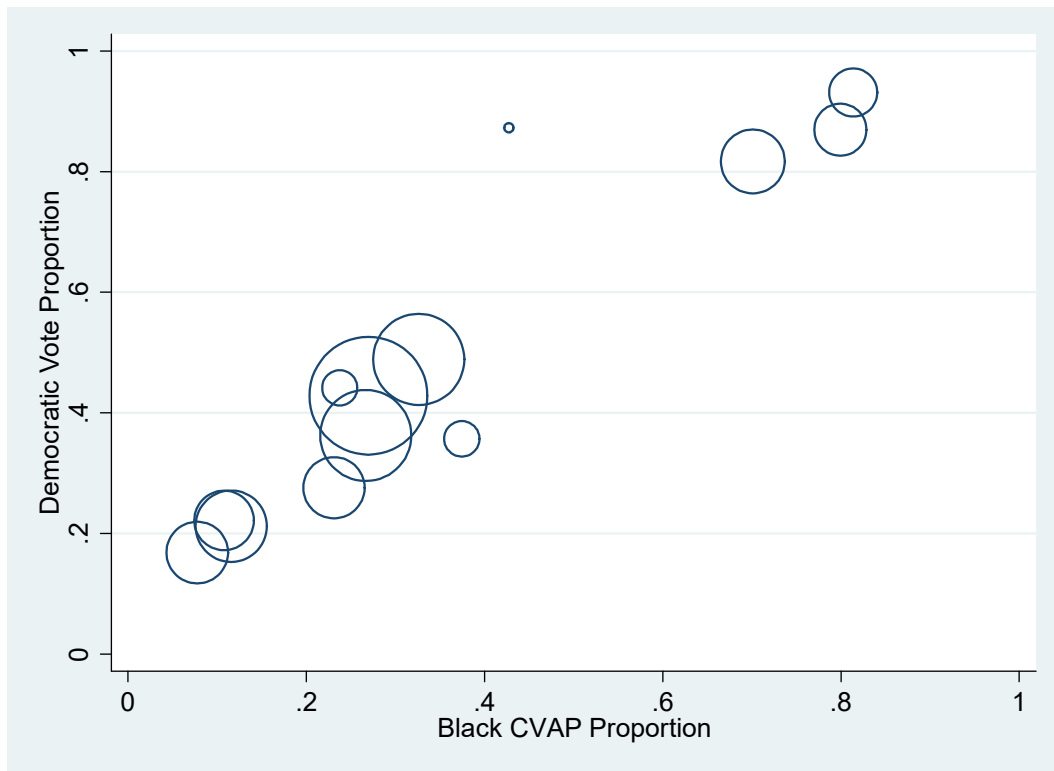


Figure 13. Scatterplot Muscogee County

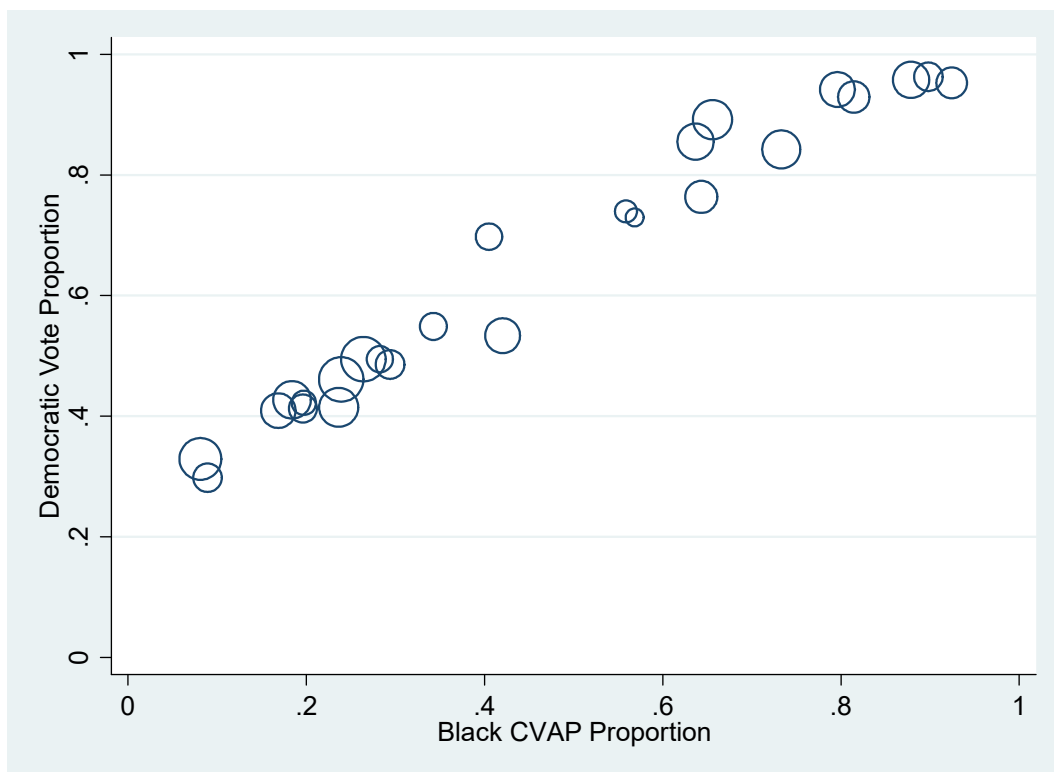


Figure 14. Scatterplot Richmond County

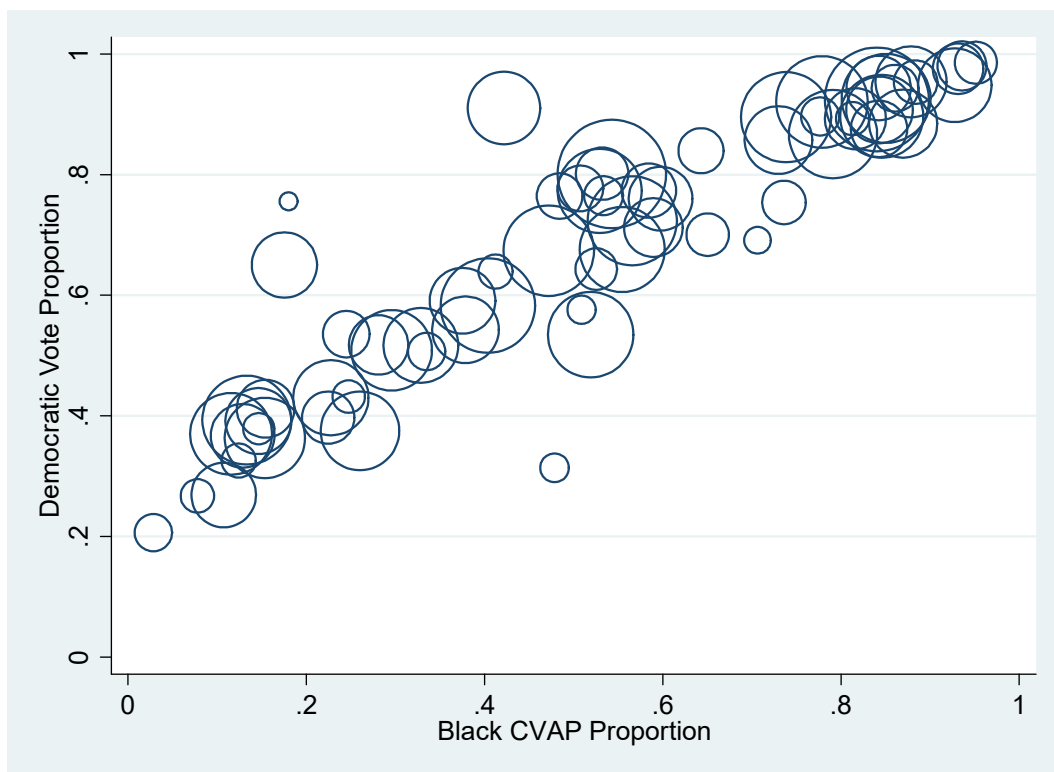
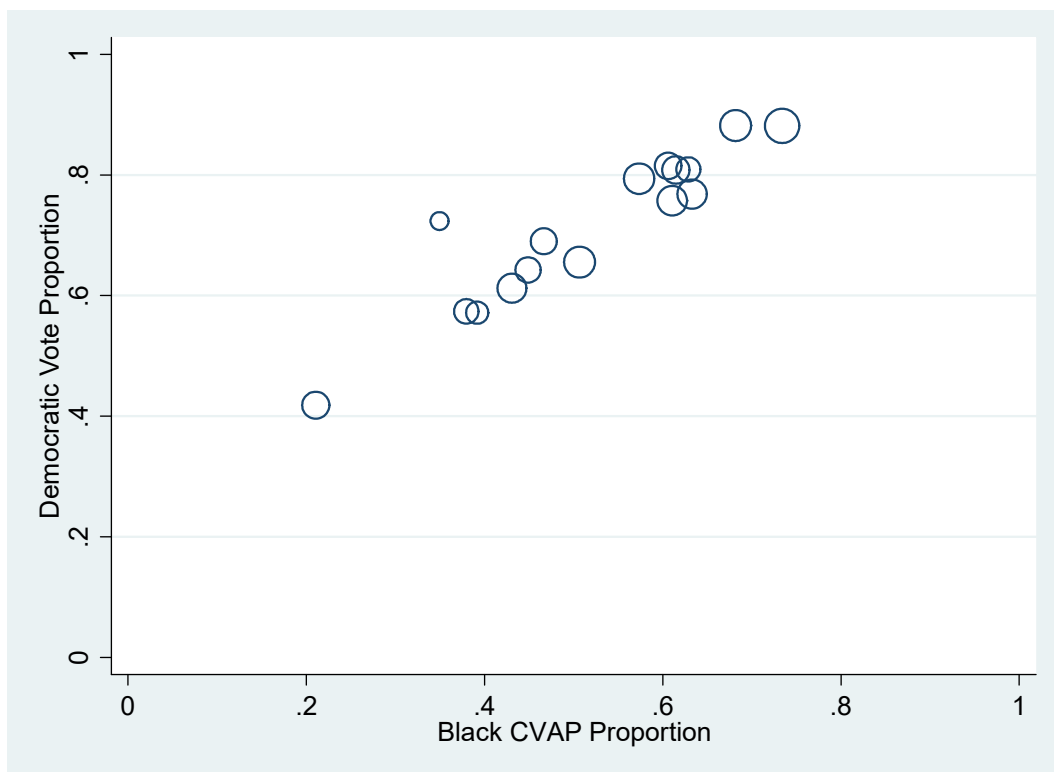


Figure 15. Scatterplot Rockdale County



### 2018 Gubernatorial Election (Kemp v. Abrams)

Below I repeat the same type of tests for racial bloc voting as above for the 13 counties of interest separately. Homogeneous precinct analysis indicates what we would expect with racial bloc voting – majorities in overwhelmingly Black precincts vote heavily in favor of Stacey Abrams – ranging from 95.9 percent to 98.1 percent, while the homogeneous White precincts demonstrate heavy voting for Kemp. DeKalb County stands out insofar as the white voters in that county do vote for Abrams (62.1 percent).

Table 3. Percent of vote for Abrams in Homogenous Precincts, 2018 Gubernatorial Election

	90%+ BCVAP	90%+ WCVAP
Cobb		32.6% 6 precincts
Chatham	98.1% 9 precincts	34.0% 14 precincts
Clayton	96.2% 5 precincts	
DeKalb	97.6% 52 precincts	62.1% 4 precincts
Dougherty	97.3% 10 precincts	
Douglas		
Fulton	97.8% 103 precincts	43.8% 26 precincts
Gwinnett		37.0% 1 precinct
Henry		
Lowndes		
Muscogee	95.9% 1 precinct	
Richmond	97.1% 4 precincts	21.8% 1 precinct
Rockdale		

\*entries indicate the percent of the vote for Raphael Warnock and the number of precincts in each county that are 90 percent or more Black CVAP and Non-Hispanic White CVAP. Black entries indicate no homogeneous precincts exist in the county for that group.

Table 4. Ecological Regression Analysis for 2018 Gubernatorial Election, select counties.

	White estimate	Black Estimate	Hispanic Estimate	Number of Observations
Cobb	32.5	100	84.8	141
Chatham	28.1	100	100	90
Clayton	26.0	100	100	58
DeKalb	65.4	100		187
Dougherty	3.3	100	100	28
Douglas	14.6	100		25
Fulton	48.1	100	100	38
Gwinnett	27.3	99.1	100	156
Henry	6.6	100	100	37
Lowndes	2.0	100		9
Muscogee	15.5	100		25
Richmond	18.7	100	100	68
Rockdale	9.9	100	80.4	16

The ecological regression results are similar to those for the Senate. Every county except Dekalb shows majority support for the White candidate. In all counties, minority voters demonstrate majority support for the Black candidate.

Figure 16. Scatterplot Cobb County

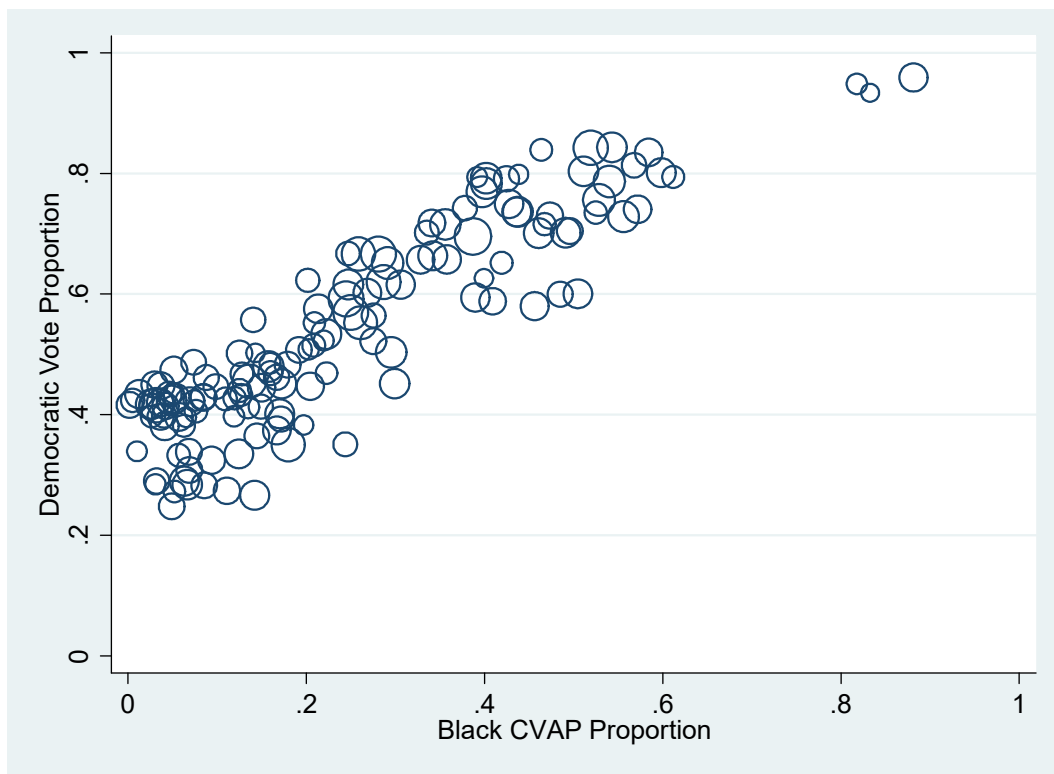


Figure 17. Scatterplot Chatham County

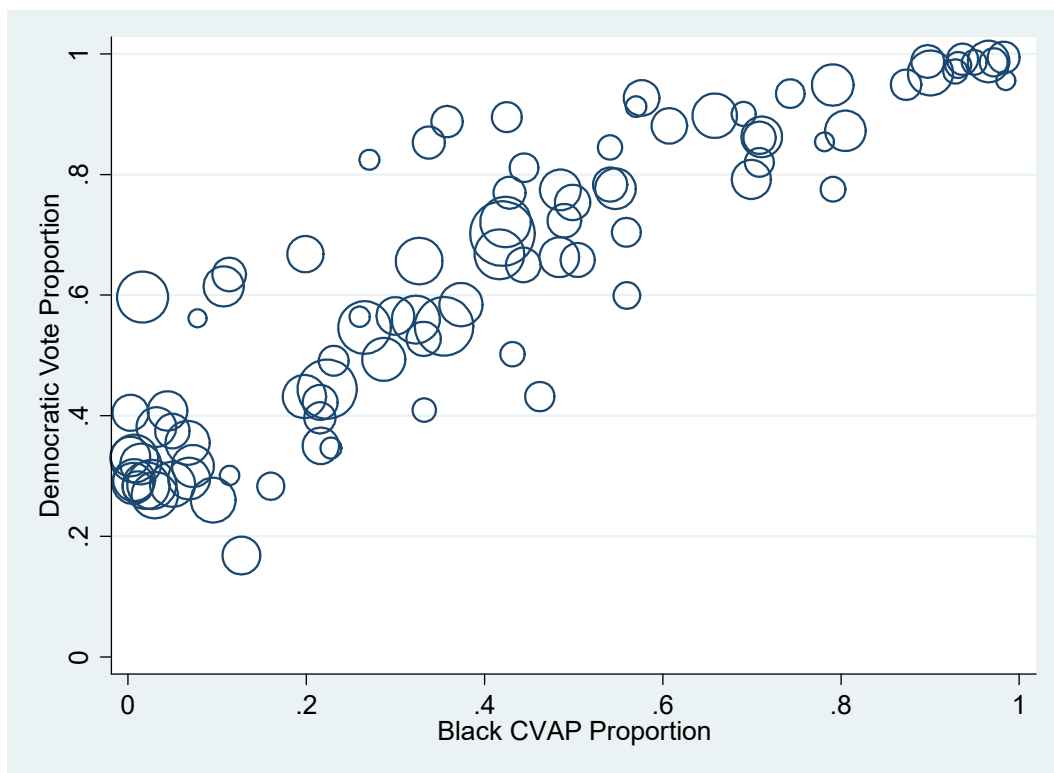


Figure 18. Scatterplot Clayton County

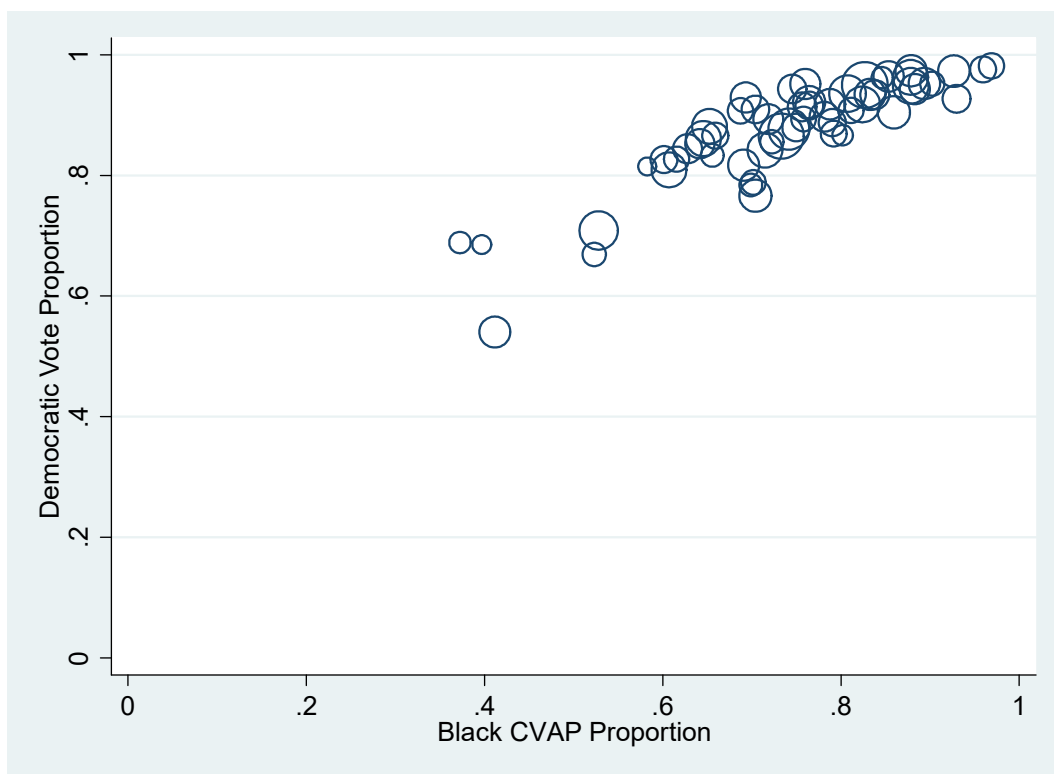


Figure 19. Scatterplot DeKalb County

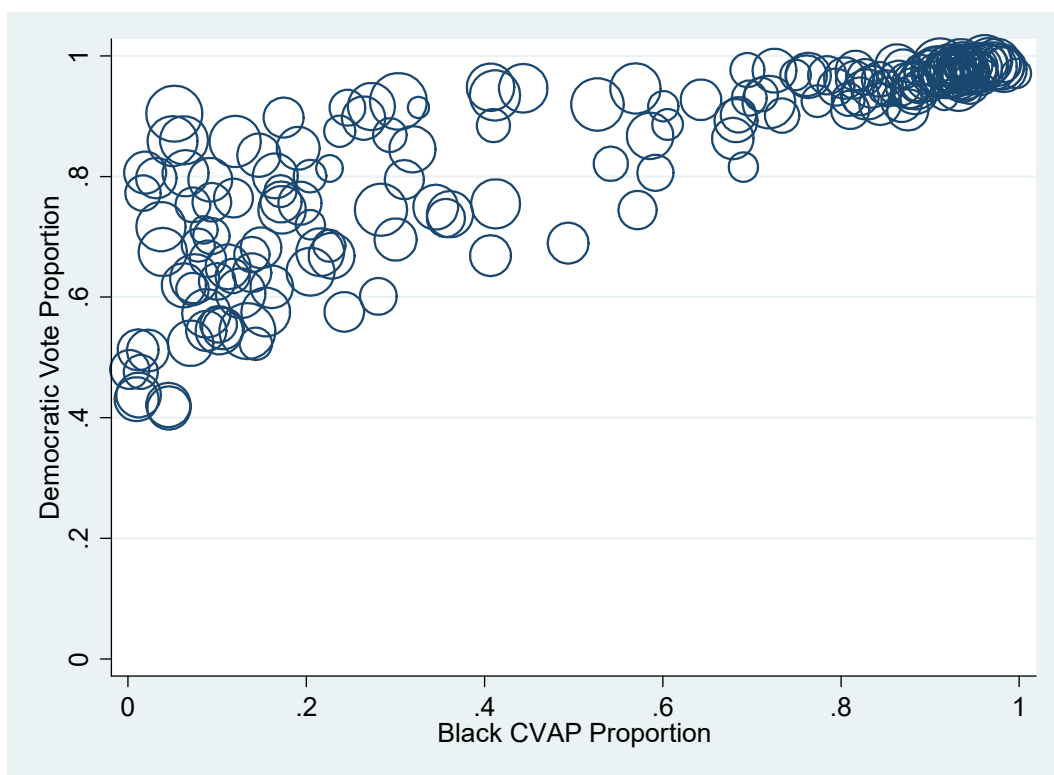


Figure 20. Scatterplot Dougherty County

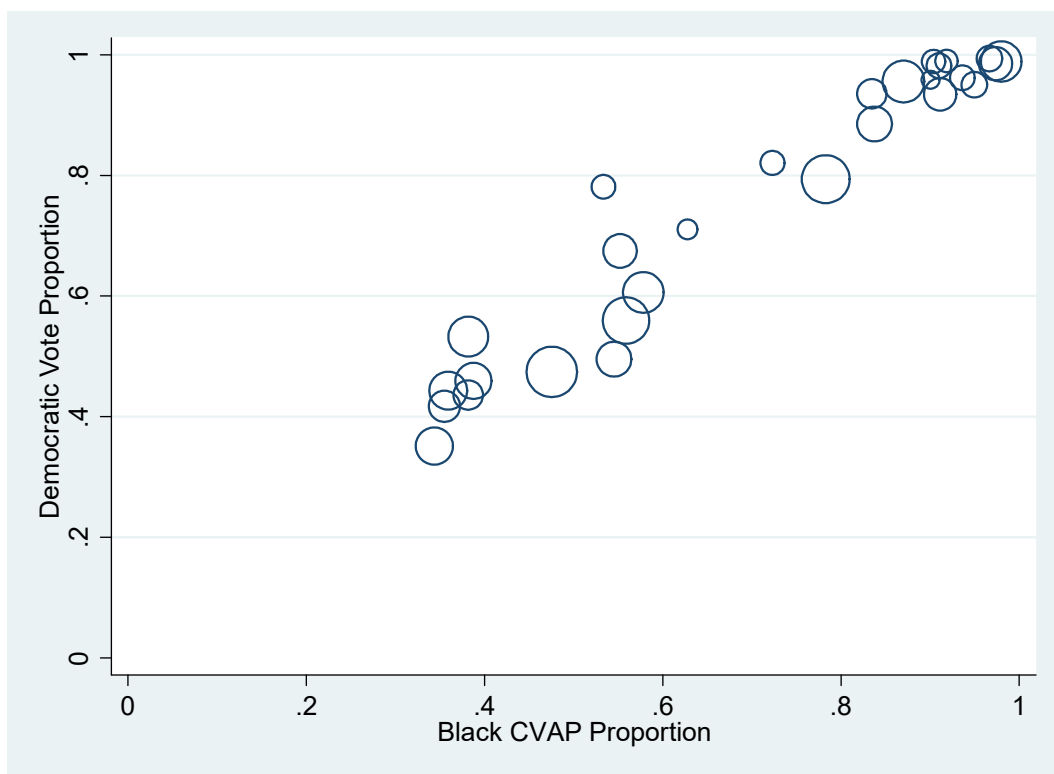


Figure 21. Scatterplot Douglas County

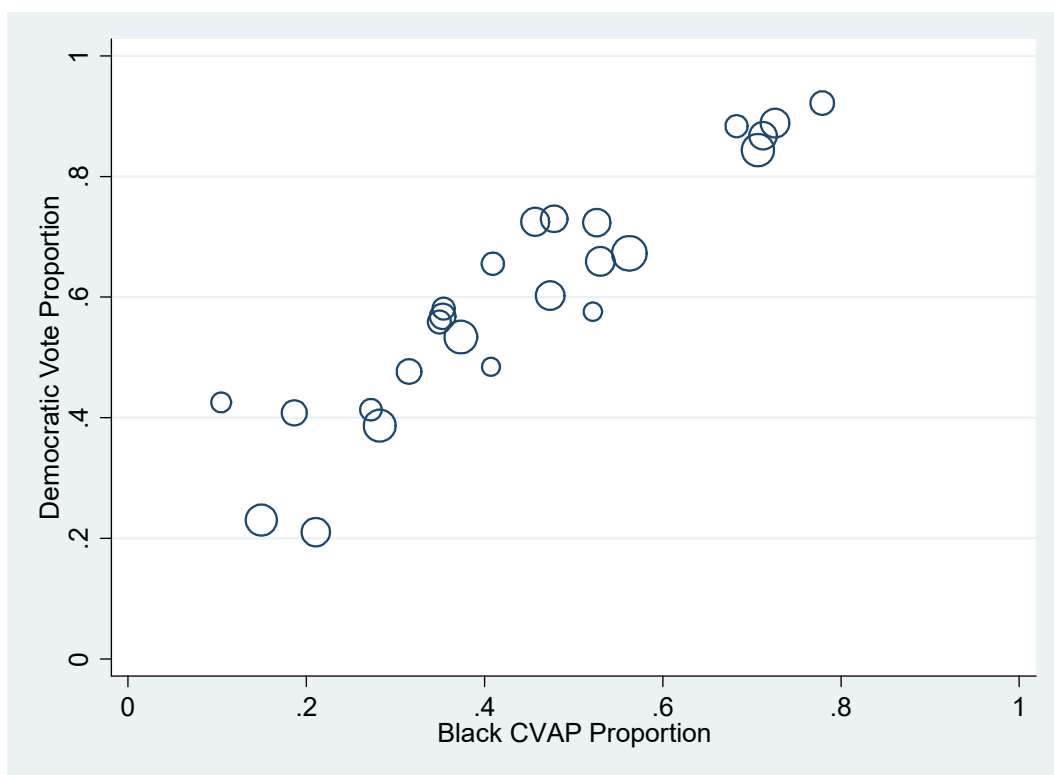


Figure 22. Scatterplot Fulton County



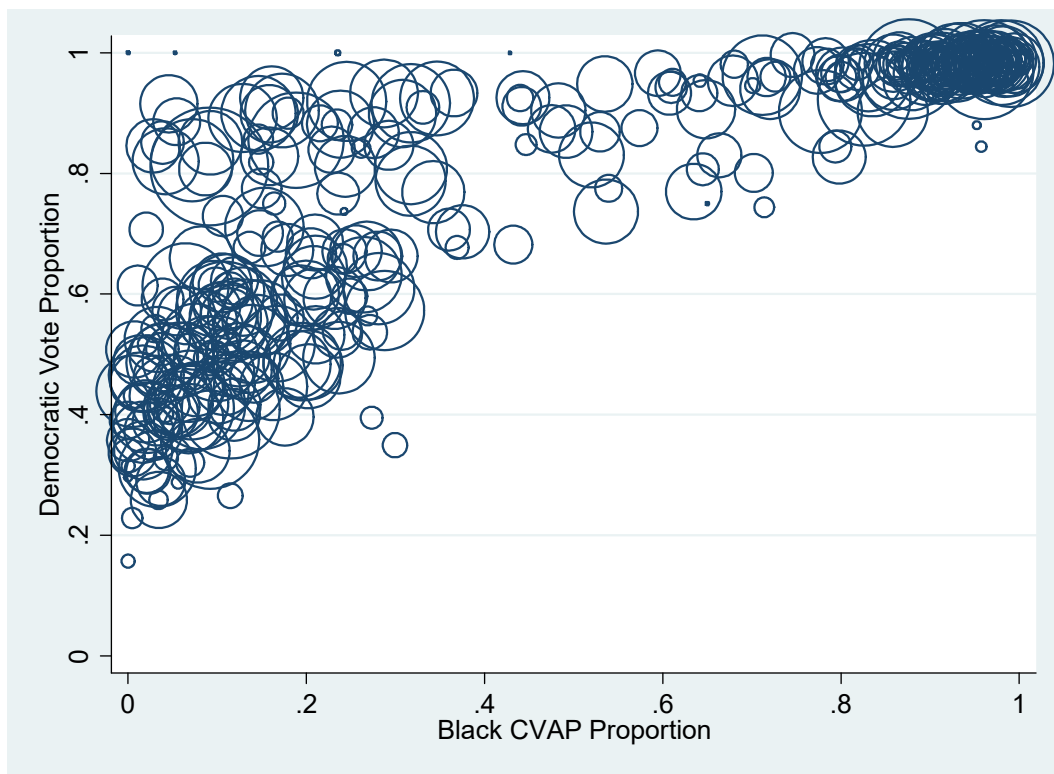


Figure 23. Scatterplot Gwinnett County

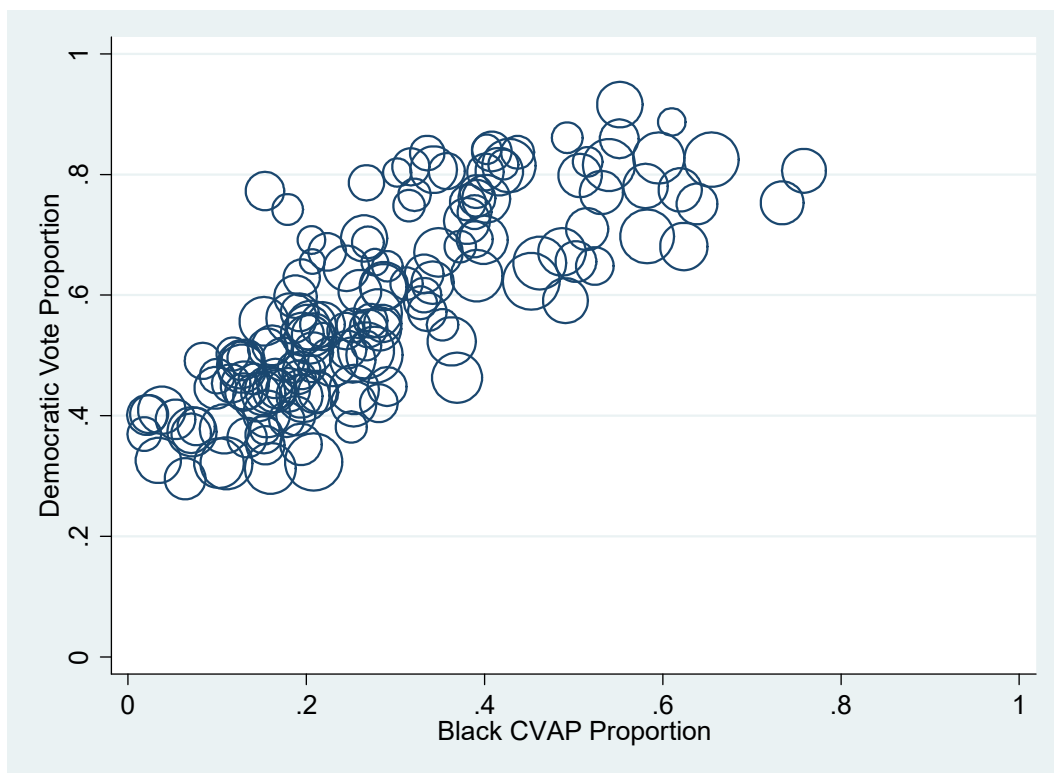


Figure 24. Scatterplot Henry County

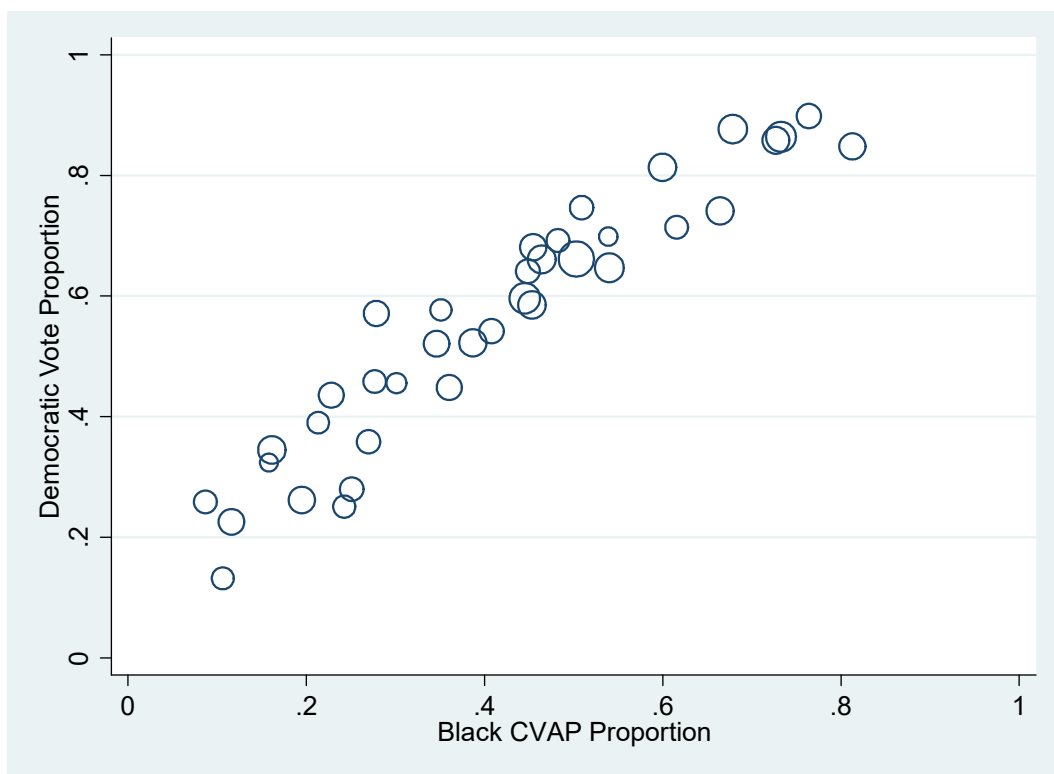


Figure 25. Scatterplot Lowndes County

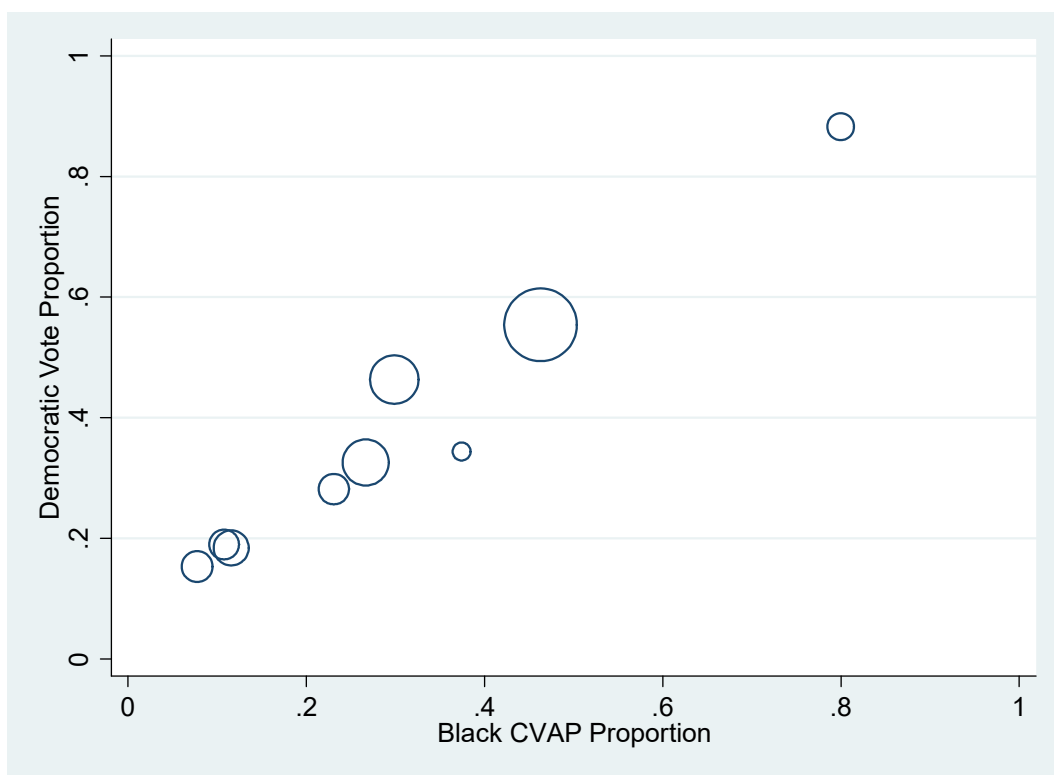


Figure 26. Scatterplot Muscogee County

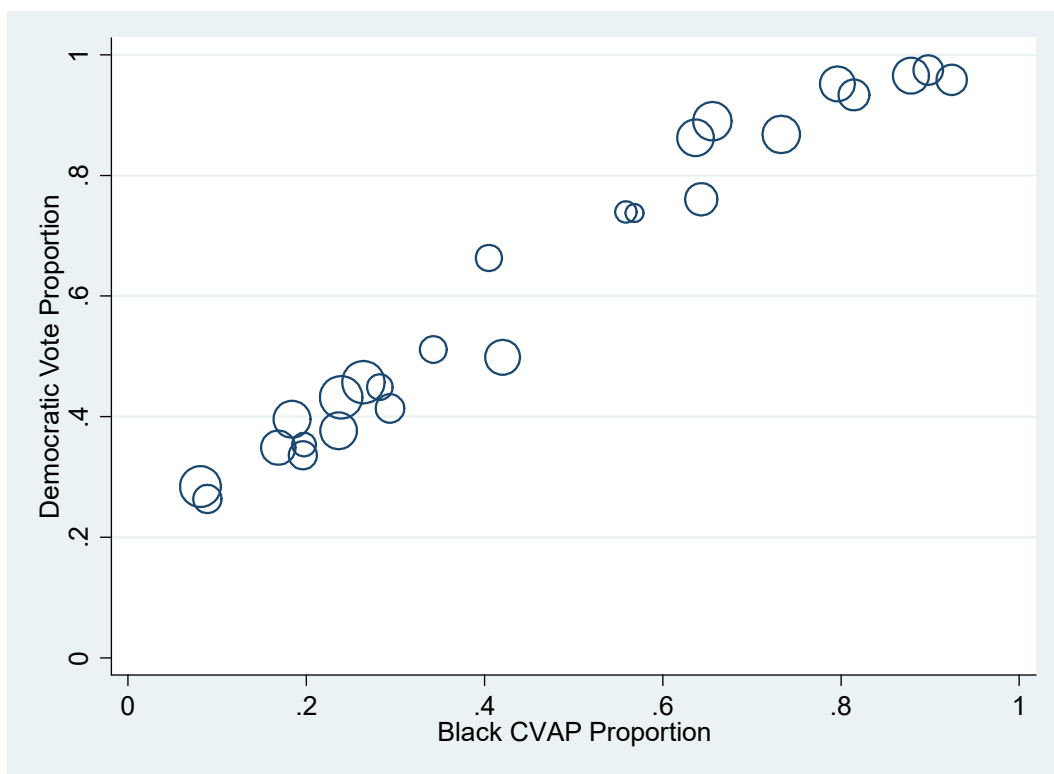


Figure 27. Scatterplot Richmond County

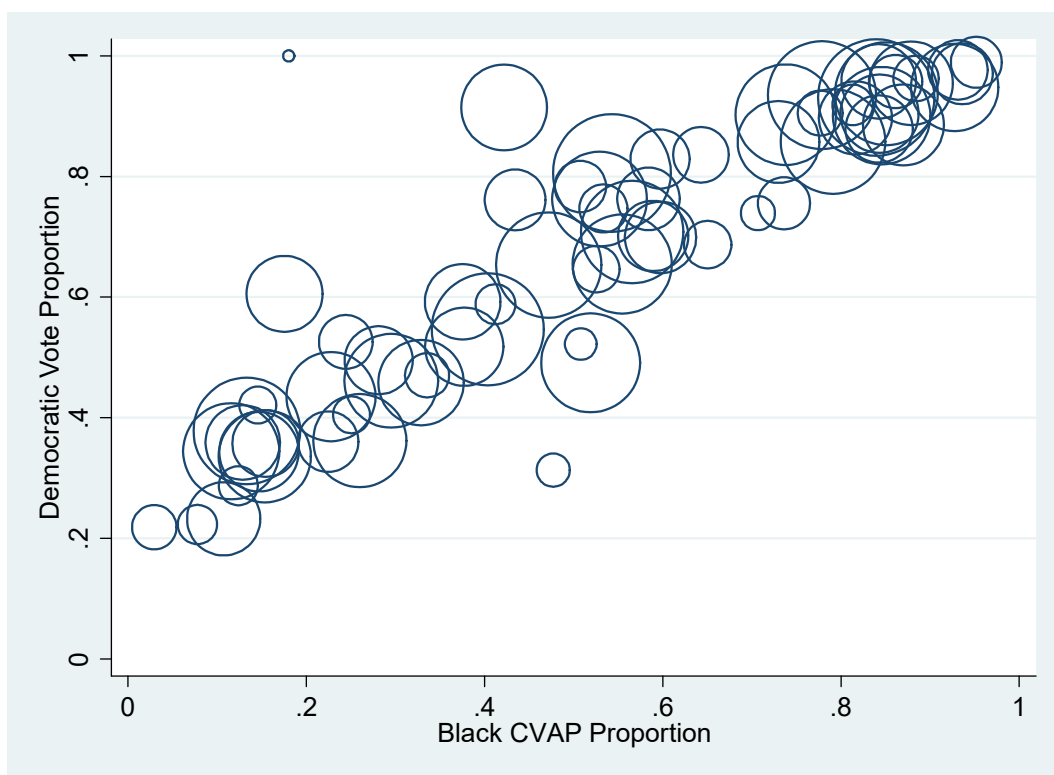
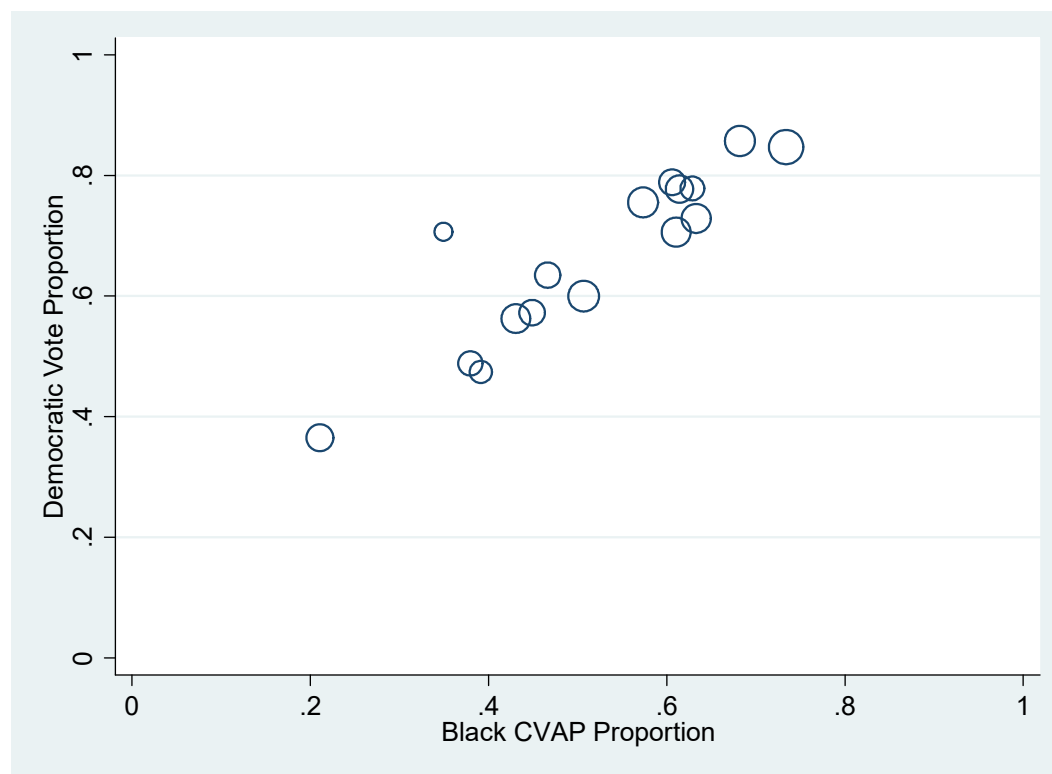


Figure 28. Scatterplot Rockdale County



The results of the above analysis indicate that racially polarized voting is present in Georgia statewide, and present in all of the counties analyzed, except perhaps in DeKalb County where estimates indicate a majority of white voters there supported both Abrams and Warnock. To rule out the effects of partisanship, it is common to use primary elections in racial bloc voting analysis. We usually look for a Democratic primary that pits a Black candidate versus a White candidate. Neither of the primaries for Abrams or Warnock are good examples for this analysis – Warnock did not have a primary, and Abrams won her primary in a landslide.

## **Dekalb County Analysis**

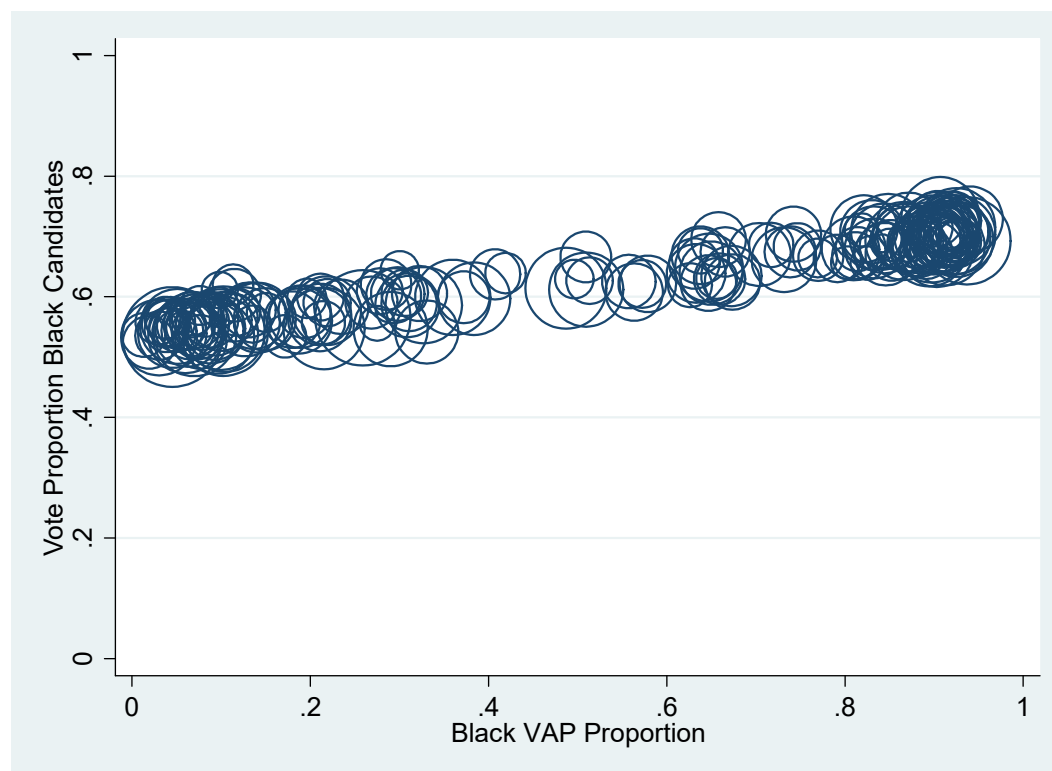
### **2018 Democratic Primary Lieutenant Governor**

The second election I used for this analysis is the 2018 Democratic Primary election for Lieutenant Governor. This election was between Sarah Riggs Amico, who is White, and Triana Arnold James, who is Black. Amico beat James 55.2%-44.8%.

Ecological regression estimates for James vote: White 52.42, Black 71.55, Hispanic 60.54. This election demonstrates significant support for the African American candidate among White voters.

There are 34 homogeneous Black precincts that averaged 70.4 support for the Black candidate.

Figure 29. Scatterplot DeKalb County Lt. Governor 2018 Democratic Primary



### 2018 Democratic Primary Secretary of State

The Democratic Primary for the 2018 Secretary of State in Georgia featured John Barrow, who is white, running against Dee Dawkins-Haigler and R.J. Hadley, both of whom are African American. I treat the votes for Dawkins-Haigler and Hadley as one group of votes for a Black candidate. Barrow beat the other two candidates with 51.5 percent of the vote.

Ecological regression estimates:

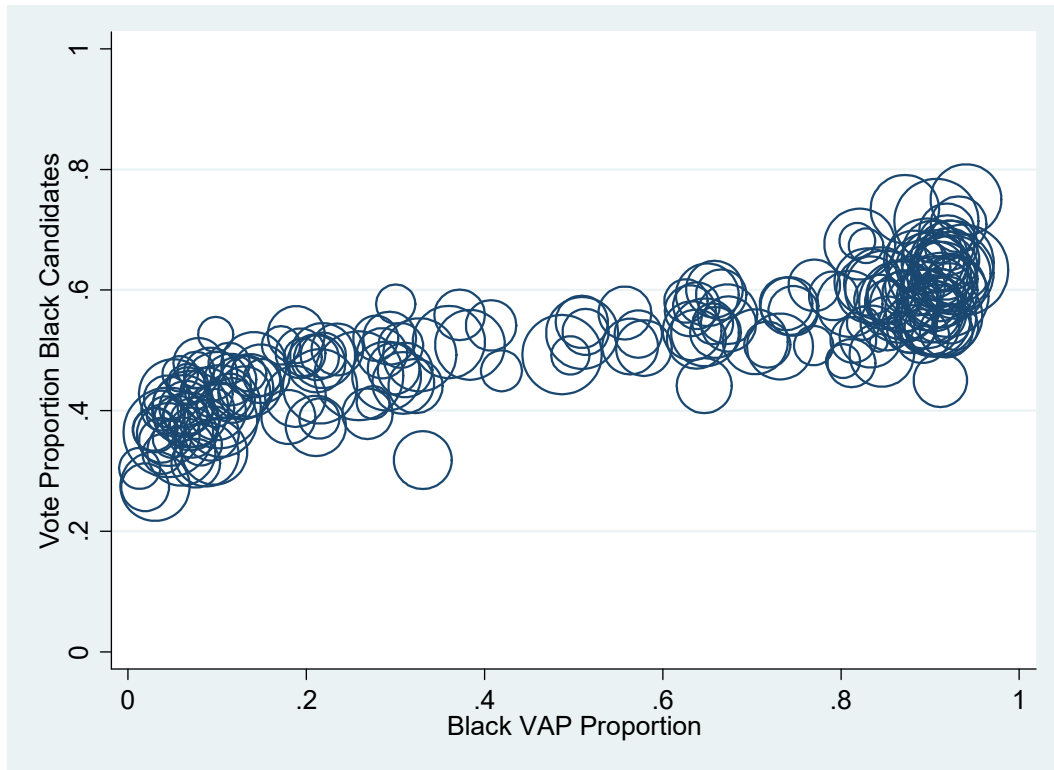
White voters: 36.58 for Black candidate

Black voters: 63.24 for Black candidate

Hispanic voters: 50.69 for Black candidate

There are 34 homogeneous Black districts that average 61.35 percent for Black candidate.

Figure 30. Scatterplot DeKalb County Sec. of State 2018 Democratic Primary



This election does demonstrate racially polarized voting in DeKalb County. A majority of the white voters supported Barrow, while a majority of Black voters supported one of the two Black candidates.

## Conclusion

Standard racial bloc voting analysis indicates the presence of racially polarized voting in the state of Georgia. Moreover, the county-by-county analysis also demonstrates the presence of racially polarized voting for all thirteen counties of interest. DeKalb County showed high levels of white crossover voting in the two general elections examined, but the primary election data indicated the presence of racial bloc voting in DeKalb County as well.

# EXHIBIT 30

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

GEORGIA STATE CONFERENCE	)	
NAACP, et. al.,	)	CIVIL ACTION NO.
	)	1:21-cv-05338-ELB-SCJ-SDG
Plaintiffs,	)	THREE-JUDGE COURT
	)	
v.	)	Served on behalf of the Georgia State
	)	Conference of the NAACP Plaintiffs.
STATE OF GEORGIA et. al.,	)	
	)	
Defendants.	)	

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**Declaration of Dr. Peyton McCrary**

Pursuant to 28 U.S.C. § 1746, I, Peyton McCrary, make the following  
declaration:

**Introduction**

1. My name is Peyton McCrary, and I reside in Arlington, Virginia. I have been asked by attorneys for the plaintiffs in this litigation to examine the Congressional and State legislative redistricting plans adopted by the State of Georgia following the receipt of the 2020 census redistricting data. Congress set forth specific factors it believed should guide the federal courts in applying Section 2 in its official report,<sup>1</sup> often identified as the “Senate Factors,” based in part on the

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<sup>1</sup> Report of the Committee on the Judiciary on S. 1992 (Voting Rights Act Extension), U.S. Senate, 97<sup>th</sup> Cong., 2<sup>nd</sup> Sess., Report No. 97-417 (hereafter cited as 1982 Senate Report).



McBath's success in a majority-white district, there were still five Black members in the Georgia congressional delegation (35.7 percent of the delegation).<sup>284</sup> One of the nine non-Hispanic white members of Georgia's congressional delegation, Carolyn Bourdeaux in District 7, was a Democrat.<sup>285</sup>

107. The results of the 2022 general elections did not significantly change the degree of minority representation. In the Georgia congressional delegation there were still 5 African American Representatives; each incumbent was re-elected,<sup>286</sup> but only because Lucy McBath moved to the 7<sup>th</sup> Congressional District after the boundaries of her 6<sup>th</sup> District were realigned beyond recognition. There were still 9 non-Hispanic whites in the delegation, but one white Democrat – Representative Carolyn Bourdeaux in the 7<sup>th</sup> District – was not re-elected, and a white Republican replaced Lucy McBath in the 6<sup>th</sup> District.<sup>287</sup>

108. The records of the General Assembly identify 56 members who served in the State Senate in the 2021-2022 Regular Session – one for each of the 56 senate districts.<sup>288</sup> Of the 56 state senators, white Republicans constituted 34 of the

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A Conceptual Framework and Some Empirical Evidence,” 79 *N. Car. L. Rev.* 1383 (June 2001).

<sup>284</sup> See Note 277 above, citing Georgia Secretary of State, [https://sos.ga.gov/index.php/Elections/voter\\_turn\\_out\\_by\\_demographics](https://sos.ga.gov/index.php/Elections/voter_turn_out_by_demographics)

<sup>285</sup> Ballotpedia Congressional.

<sup>286</sup> Results.enr.clarityelections.com/GA/115465/web.307039/#/summary.

<sup>287</sup> *Id.*

<sup>288</sup> <https://Legis.ga.gov/members/Senate> (hereafter cited as Georgia State Senators).

Chief Judge of the Court.<sup>309</sup> Governor Barnes also appointed Black judge Herbert Phipps to the Court of Appeals in 1999. Judge Phipps retired before his term ended in 2016 and was succeeded by Judge Clyde Reese.<sup>310</sup> In 1990 Clarence Cooper, then a Black superior court judge in Fulton County, was appointed to the Court of Appeals in 1990, where he served appointed to the federal bench in 1994 as a district court judge in the Northern District of Georgia.<sup>311</sup>

116. *Even in the special case of judicial office*, where gubernatorial appointment of judges and justices enables minority lawyers to run for election in the first instance with the benefit of being incumbents, election of minority candidates to public office in Georgia continued to lag behind the rate of election for non-Hispanic white candidates through the 2020 general election. The 2022 general elections did not change this pattern.

### **Conclusion**

117. My analysis in this report demonstrates that the State of Georgia has a long history of discriminating against Black voters and other voters of color and restricting their franchise. This discrimination is not a relic of the past, but stubbornly persists to this day. Assuming that the plaintiffs meet the *Gingles* preconditions, it is my expert opinion that the Senate Factors I have examined

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<sup>309</sup> <https://www.gaappeals.us/m-yvette-miller>.

<sup>310</sup> <https://www.gaappeals.us/Herbert-e-hipps>.

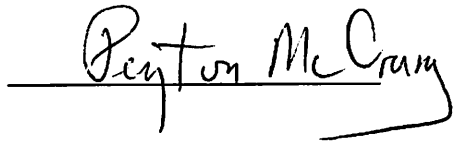
<sup>311</sup> [https://ballotpedia.org/Clarence\\_Cooper](https://ballotpedia.org/Clarence_Cooper).

weigh in favor of finding that Georgia has violated Section 2 of the Voting Rights Act.

I reserve the right to supplement this report if additional facts, testimony, and/or materials that may come to light.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of January, 2023 at 5:00 PM.

A handwritten signature in black ink, reading "Peyton McCrary". The signature is written in a cursive style with a horizontal line underneath the name.

Peyton McCrary

# EXHIBIT 31

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

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )

*Plaintiffs,* )

v. )

STATE OF GEORGIA, et al. )

*Defendants.* )

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COMMON CAUSE, et al., )

*Plaintiffs,* )

v. )

BRAD RAFFENSPERGER )

*Defendant.* )

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Case No. 1:21-CV-5338-ELB-SCJ-SDG

Case No. 1:22-CV-00090-ELB-SCJ-SDG

Served on behalf of the Georgia State Conf. of the NAACP Plaintiffs

**Expert Report of Dr. Benjamin Schneer**

in the state of Georgia to be consistent with racially polarized voting between minority and majority racial groups in (1) all enacted CDs other than CD 5, (2) in all Illustrative Map CDs other than CD 4, (3) in enacted SDs 6, 9, 16, 17, 22, 23, 25, 26, 28, 34, 35, 38, 40, 43, 44, and 55, (4) in all Illustrative Map SDs I analyze (with the possible exception of Illustrative Map 1 SD 40, which is borderline), (5) in enacted LDs 61, 65, 74, 78, 115, 116, 117, 142, 143, 151, 154, 161, 163, 165 and 171, (6) and in all Illustrative Map LDs I analyze.

7. In terms of minority groups' ability to elect their candidates of choice in the enacted congressional, state Senate and state House districts that I examine, revised maps could clearly result in greater minority representation. Furthermore, some districts with meaningful minority population levels nonetheless offer minority groups a limited ability to elect their candidates of choice based on past elections.

8. The Illustrative Maps drawn by the plaintiffs' map-drawing expert Moon Duchin offer an increased ability to elect the minority-preferred candidates in the districts I have been asked to examine. When looking across statewide elections since 2012 where minority candidates ran against non-minority candidates, in the Illustrative Congressional District Map minority candidates won these elections more than half the time in 6 of the 14 districts (43%); this contrasts with the enacted Congressional District Map, where minority candidates won more than half the time in such elections in 5 of the 14 districts (36%). In the Illustrative State Senate Maps, minority candidates won more than half the time in such elections in 5 of the 5 districts that I examined in Illustrative

Map 1 (100%) and in 2 of the 2 districts that I examined in Illustrative Map 2 (100%). This performance contrasts with the enacted Senate Districts I have examined, where minority candidates won more than half the time in 67% of districts. The Illustrative Maps for the State House outperform the enacted map in terms of ability to elect minority candidates as well.

## Methodological Approach

### Identifying Racially Polarized Voting

9. Racially polarized voting (RPV) occurs when the majority group and a minority racial group vote differently. To identify instances of RPV in Georgia, I examine (1) whether members of a minority group of interest appear to be *cohesive* in their electoral support for a candidate of choice (Specifically, does more than half of a given minority group support the same candidate?); and, (2) whether White voters oppose this candidate (Specifically, do more than half of White voters oppose the minority candidate of choice?).<sup>1</sup>

10. To make these determinations, I analyze historical voting behavior from Georgia elections since 2012. The Georgia Secretary of State tracks turnout data by racial group in each precinct, along with aggregate vote totals for each candidate in each precinct. While elections from 2012 to 2021 were conducted

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<sup>1</sup>For a detailed discussion of cohesion, see Bernard Grofman, Lisa Handley, and Richard G. Niemi, *Minority representation and the quest for voting equality*, Cambridge University Press, 1992. The authors note that courts have concluded that cohesiveness “is to be measured with reference to voting patterns” (p. 68), and that “minority groups are politically cohesive if they vote together for minority candidates” (p. 73).



under the previous district maps, I focus primarily on elections for which changes in district lines are unlikely to affect vote choice. Specifically, I use historical national and state-wide elections to evaluate congressional, state House and state Senate districts. I discuss in more detail the specific elections I have selected to study, and the rationale for my choices, in the next section.

11. Because elections are conducted under a secret ballot, it is not possible to tally vote choice directly for each racial group in order to assess voter behavior in each enacted district. Instead, I estimate racial-group-level vote totals based on the precinct-level election data, producing estimates for each racial group's vote share in support of each candidate.<sup>2</sup>

12. To do this, I employ a standard approach in the political science literature and in redistricting litigation when one must estimate the voting behavior of specific racial groups based on aggregate vote totals: ecological inference (EI).<sup>3</sup> Ecological inference makes use of (1) the statistical information captured by how strongly a candidate's level of support varies in tandem with variation in each racial group's population share across precincts, and (2) deterministic information captured in precincts that consist primarily of one racial group. For example, if a precinct is relatively homogeneous, one can place bounds on the range of possible voting behaviors for a racial group in that precinct, with the

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<sup>2</sup>On the value of both statewide elections and precinct-level data, see Gary King, *A Solution to the Ecological Inference Problem: Reconstructing Individual Behavior from Aggregate Data*, Princeton University Press, 1997. King writes: "For electoral applications, choosing data in which all geographic units have the same candidates (such as precincts from the same district or counties form the same statewide election) is advisable so that election effects are controlled" (p. 28).

<sup>3</sup>King, 1997.

most extreme version of this occurring when a precinct is entirely homogeneous.<sup>4</sup> The key advantage of EI is that it combines both the statistical and deterministic information I have just described. Technical summaries of the EI approach can be found in a variety of sources, including King, Rosen and Tanner (2004).<sup>5</sup> In this report, I use the RxC method of ecological inference, allowing me to identify voting patterns across all the primary racial groups in Georgia at once. This approach is based upon the hierarchical model described in Rosen, Jiang, King and Tanner (2001),<sup>6</sup> and the draws from this model's posterior distribution are obtained using a Metropolis-within-Gibbs sampling algorithm.<sup>7</sup> Previous research comparing approaches including ecological regression, 2x2 ecological inference and the Rosen et al. (2001) method has found that these approaches tend to yield similar results, with Rosen et al. (2001) having a slight edge in instances with more than two racial groups.<sup>8</sup> Additionally, a variety of published research and legal cases have made use of this method.<sup>9</sup>

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<sup>4</sup>Otis Dudley Duncan and Beverly Davis, "An alternative to ecological correlation," *American Sociological Review* (1953).

<sup>5</sup>Gary King, Ori Rosen, and Martin A. Tanner, "Information in ecological inference: An introduction," In *Ecological Inference: New Methodological Strategies*, pp. 1-12, Cambridge University Press, 2004.

<sup>6</sup>Ori Rosen, Wenxin Jiang, Gary King, and Martin A. Tanner, "Bayesian and frequentist inference for ecological inference: The  $R \times C$  case," *Statistica Neerlandica* 55, no. 2 (2001): 134-156.

<sup>7</sup>Olivia Lau, Ryan T. Moore, and Michael Kellermann, "eiPack:  $R \times C$  ecological inference and higher-dimension data management," *New Functions for Multivariate Analysis* 7, no. 1 (2007): 43, Available at <https://cran.r-project.org/web/packages/eiPack/index.html>.

<sup>8</sup>Justin de Benedictis-Kessner, "Evidence in voting rights act litigation: Producing accurate estimates of racial voting patterns," *Election Law Journal* 14, no. 4 (2015): 361-381.

<sup>9</sup>Research articles making use of this approach include: Michael C. Herron and Jasjeet S. Sekhon, "Black candidates and black voters: Assessing the impact of candidate race on uncounted vote rates," *The Journal of Politics* 67, no. 1 (2005): 154-177. Matt Barreto, Loren Collingwood, Sergio Garcia-Rios, and Kassra AR Oskooii. "Estimating candidate support in Voting Rights Act cases: Comparing iterative EI and EI- $R \times C$  methods." *Sociological Methods & Research* 51, no. 1 (2022): 271-304. Legal cases where experts have presented opinions

## State House Districts

90. The tables below report the performance of the State House districts that I have analyzed under Illustrative Map 1 and 2. In Map 1, minority candidates win all past elections in LDs 64, 144 and 161 and a majority of past elections in LDs 74, 117 and 151. Several of these districts are relatively competitive, with the minority candidate winning by a narrow margin (e.g., less than 55%) at least a third of the time in LDs 74, 117, 144 and 151. Finally, LD 171 offers some but by no means an overwhelming chance of electing minority candidates, as in this district minority candidates won 35% of past elections.

91. In Map 2, minority candidates win all past elections in LDs 64, 144 and 161. In LD 117, minority candidates won 35% of past elections.

92. To sum up, in each Illustrative State House Map, minority candidates won more than half the time in every district but one that I examine (86% and 75% of districts, respectively). This performance contrasts with the enacted House Districts I have examined, where minority candidates won more than half the time in 72% of districts.

93. I reserve the right to supplement this report if additional facts, testimony, and/or materials come to light. Pursuant to 28 U.S.C 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of January, 2023 at 11:30pm.

Signature: Ben Schuer

# EXHIBIT 32

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

COMMON CAUSE; LEAGUE OF  
WOMEN VOTERS OF GEORGIA;  
DR. CHERYL GRAVES; DR.  
URSULA THOMAS; JASMINE  
BOWLES; DR. H. BENJAMIN  
WILLIAMS; BRIANNE PERKINS,  
Plaintiffs,

vs

CIVIL ACTION

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

FILE NO.:

1:22-CV-00090-ELB-SCJ-SDG

VIDEOTAPED DEPOSITION OF

SENATOR MIKE DUGAN

January 16, 2023

10:22 a.m.

18 Capitol Square, Southwest  
Atlanta, Georgia 30334  
Ashley N. Ellis, CVR-7199, CCR

1 very thin lines between pockets of populations to achieve a  
2 desired outcome with seats within the body.

3 Q Any particular districts you can think of for that  
4 example in 2000?

5 A If you see the entire proposed map from 2010 -- I'm  
6 sorry, 2000, it's almost -- it's almost every district.

7 Q What changed in the process between the 2000  
8 redistricting and 2010 or 2020 redistricting, to your  
9 knowledge?

10 A It's going to sound glib. The party that controlled  
11 the legislator changed.

12 Q When did the -- strike that.

13 What did your committee do to ensure that the same  
14 issue you're identifying in 2000 did not happen in 2020?

15 A You're talking about the entire redistricting  
16 committee?

17 Q Correct.

18 A Well, we had a very open process throughout the  
19 entire period leading up to the session starting, that special  
20 session starting, where we went around the state. We were as  
21 transparent as we possibly could, interacted in a bipartisan  
22 manner as much as we possibly could. Now, that doesn't mean  
23 that everybody's always going to get everything that they want  
24 at the end of that deliberation, but it's as much as we  
25 possibly -- everything was open and transparent.

1           A     Okay. I'm going to answer you, but I'm going to grab  
2     some coffee real quick first if I can -- if that's all right  
3     with you.

4           Q     Should we go off record then?

5           A     I'm just going to pour it and come right back.

6           Q     Okay. I'd prefer that you answer the question, and  
7     if you need a break, we can go off record.

8           A     So go ahead and ask it. Ask your question.

9           Q     What is your understanding of the senate committee's  
10    function?

11          A     The senate committee was responsible for working  
12    together in a bipartisan manner to create and draft the state  
13    senate districts to vote on and improve -- approve the state  
14    House districts and vote on and approve the congressional  
15    districts.

16          Q     The chair of the senate committee is John Kennedy,  
17    Senator John Kennedy?

18          A     He was the former chair of redistricting.

19          Q     What was your role on the committee?

20          A     What was my outlook of the committee?

21          Q     Role.

22          A     I was a member.

23          Q     For what reason did you seek membership on this  
24    committee?

25          A     I didn't.

1 matter of fact. The chairs of both chambers both said we would  
2 much prefer to have all the data in everybody's hands before we  
3 have the town halls, but because of the -- the delay, because  
4 of the pandemic, what we wanted to do was go ahead and have a  
5 listening session to hear their concerns on the front end,  
6 regardless of having all the data there or not. Those concerns  
7 for the communities were the -- were going to be the same  
8 prenumbers and post numbers.

9 Now, part two on that is, once you had all that data  
10 and you came back into session, then you had multiple hearings  
11 over several weeks to have people come in with the information  
12 in hand as the hard data.

13 Q If I could draw your attention back to August 12th.  
14 Let me know when you're there.

15 A I'm there.

16 Q And the first sentence says states received the data  
17 they may use to begin redistricting, correct?

18 A That's correct.

19 Q Based on your experience working in the committee,  
20 any reason to believe the state of Georgia was an exception to  
21 that sentence that was able to begin redistricting using data  
22 received before August 12th?

23 A Do I think that Georgia would be the only exception  
24 to prevent it from starting redistricting?

25 Q Was Georgia able -- strike that.



1 population of voting age?

2 A If you -- if there was another one that was more than  
3 40 percent, then you would have a rounding error somewhere  
4 because that would be over -- to be over 100 percent if you  
5 added them up.

6 Q So fair to say that the majority of the increase in  
7 voting age population in Georgia between 2010 and 2020 was with  
8 the black or African-American population?

9 A It's your number, yes, that would be a fair  
10 statement.

11 Q Was this factor considered in the committee during  
12 redistricting?

13 A Was communities of color an interest?

14 Q The fact that -- I can clarify. Was the fact that  
15 the population that most increased during -- between 2010 and  
16 2020, was the black or African-American population considered  
17 during the redistricting in the committee?

18 A Now, I don't -- I'm sorry, were you finished?

19 Q I'm finished.

20 A I don't remember at any point saying only the  
21 African-American community. There were multiple times where we  
22 discussed the increased diversity, especially in portions of  
23 this area. There we're talking about Atlanta and DeKalb. But  
24 it was more inclusive of various races and ethnicities.

25 Q So the increase in the black or African-American

1 population was never considered singularly?

2 A Not that I remember, no.

3 Q Thank you.

4 MR. JAMIESON: I'd like to take a five-minute break  
5 if that's okay with everyone.

6 THE WITNESS: I'm okay if it's longer than that.

7 MR. JAMIESON: Okay. So can we come back on record  
8 at 1:15?

9 THE VIDEOGRAPHER: The time is 1:08. We're going off  
10 the video record.

11 (BREAK TAKEN)

12 THE VIDEOGRAPHER: 1:17. We are back on the video  
13 record.

14 BY MR. JAMIESON:

15 Q Senator, I think we're back on record.

16 A Okay.

17 Q Thank you. I'm going to show you what I've marked as  
18 Exhibit 5. What does this appear to be to you?

19 (Plaintiff's Exhibit No. 5 marked for identification.)

20 A It appears to be the 2021 community guidelines for  
21 hearings and meetings.

22 Q Have you seen this before?

23 A Oh, yeah.

24 Q If I can turn your attention to Page 4, I believe,  
25 begins what Roman numeral 3, redistricting plans. Please let

Page 93

1 A Okay.

2 Q The first bullet says prohibition on favoring or  
3 disfavoring an incumbent candidate or party. The prohibition  
4 in a given state may be broad or covering any person or group  
5 or may be limited to intentionally or in dually favoring a  
6 person or group. What does that mean to you?

7 A What it says right there is you've got a prohibition  
8 on favoring or disfavoring an incumbent candidate or party.

9 Q If I could direct you to the second bullet.  
10 Prohibition on using partisan data. Line drawers, whether they  
11 may be commissioners, nonpartisan staff, or legislators are  
12 prohibited from using incumbent residences, election results,  
13 party. Did I read that correctly?

14 A You did.

15 Q Was partisan data relied on during the redistricting  
16 process?

17 A Not to my knowledge.

18 Q And partisan here means for the benefit of one  
19 political party. Is that a definition -- is that a fair  
20 definition?

21 A Partisan, by definition, is one side or another.

22 Q Was --

23 A But you -- I'm sorry. There's a second part to that  
24 though.

25 Q What's the second part?

1 (Plaintiff's Exhibit No. 7 marked for identification.)

2 A Yes.

3 Q What is this press release?

4 A It is a joint statement from then Lieutenant Governor  
5 Jeff Duncan and then Redistricting Chair John Kennedy on the  
6 senate draft of Georgia's congressional map, September 27th,  
7 2021.

8 Q Would you agree that this article shows that on  
9 September 27th, 2021 the reapportionment office released  
10 congressional redistricting plan from the senate committee?

11 A Yes.

12 Q And this was released by Senator Kennedy and  
13 Lieutenant Governor Duncan?

14 A Yes.

15 Q I am placing before you what we marked as Exhibit 8.  
16 What does this exhibit appear to be?

17 (Plaintiff's Exhibit No. 8 marked for identification.)

18 A It appears to be a draft Georgia congressional  
19 district on -- it don't have a date on it.

20 Q I can represent to you that this is the September  
21 27th draft, and if you turn to Page 4, it says at the top  
22 September 28th fair population summary.

23 Okay. Any reason to disagree that this was the map  
24 released -- the proposed map released by Lieutenant Governor  
25 Duncan and Senator Kennedy?

1 A This is not the map that we voted on.

2 Q Correct. This is a draft of the proposed -- of a  
3 proposed map released on September 27th, correct?

4 A Yes.

5 Q Have you reviewed this before?

6 A Yes.

7 Q To your knowledge, was there ever a town hall held to  
8 discuss this plan?

9 A There was not a town hall. There were multiple  
10 committee meetings.

11 Q When did you first see this proposed map?

12 A In all probability, September the 27th.

13 Q Who drew this map?

14 A I don't know.

15 Q So you had no role in drawing any parts of this  
16 September 27th plan, correct?

17 A I did not. I'm going to reiterate one more time. I  
18 was simply a member on the committee.

19 Q With respect to the map on Page 1, have you ever seen  
20 these boundary lines overlaid or drawn on a map with different  
21 features, like a map that had partisan racial, age, or other  
22 shading representing the percentage of these populations in  
23 each area?

24 A I have not.

25 Q Did anyone present you with proposed maps for the

1 September 27th plan for your consideration prior to September  
2 27th?

3 A Talking about for the September 28th prior to  
4 September 27th?

5 Q Correct, thank you.

6 A No, not that I remember.

7 Q Did anyone ask you to confer about these proposed  
8 maps prior to their release on September 28th?

9 A Not that I remember, no.

10 Q Did you review this map?

11 A Ever?

12 Q Ever.

13 A Yes, on September 28th.

14 Q Did you use a particular software to review the  
15 districts?

16 A No, no, no. Just reviewed the map.

17 Q And by review, in what manner do you mean?

18 A I mean I took it, I looked at it, and I knew that  
19 this was step one in the process, when we were going through  
20 the committee process that whatever product is going to look  
21 like at the end is not this one.

22 Q Okay. What did you not like about this map, if  
23 anything?

24 A I really didn't have any qualms about it at all with  
25 the understanding that this is a draft step one, and as you go

CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 29th day of January, 2023.



Ashley N. Ellis, CVR-7199, CCR

# EXHIBIT 33



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

CASE NUMBER: 1:21-CV-5338-ELB-SCJ-SDG

GA ST. CONF. OF NAACP, et al.,

Plaintiffs,

vs.

STATE OF GEORGIA, et al.,

Defendants.

\* \* \* \* \*

THE ORAL PROCEEDINGS OF THE  
DEPOSITION OF REP. JAN JONES

January 17, 2023

REPORTER BY:

Paul Morse

Certified Court Reporter and Notary Public

ACCR #588 Expires 9/30/23

JOB No. 5667900

1       you're aware of?

2               A.       Yeah.

3               Q.       Have you received -- I'm going to  
4       shift gears now to talk a little bit about your  
5       training and background with relation to  
6       redistricting.   Have you received training  
7       related to redistricting?

8               A.       I don't remember ever receiving  
9       any training on redistricting.   I may have, but  
10       I honestly don't remember.

11              Q.       How did you learn -- strike that.  
12       What considerations do you take into account  
13       when you're engaged in the redistricting  
14       process?

15              A.       Can you repeat the question?

16              Q.       What considerations do you take  
17       into account when you're engaged in the  
18       redistricting process?

19              A.       Well, complying with the Voting  
20       Rights Act, which I'm not neither a layman nor  
21       an expert in.   So I rely on lawyer, Gina  
22       Wright, communities of interest, geographic,  
23       keeping -- keeping areas as compact as is

1 possible, and certainly equal -- or as closely  
2 as possible, equal in population.

3 Q. And how did you learn that those  
4 are the considerations that should be taken  
5 into account?

6 A. Well, at least some of them were  
7 in the rules that we adopted.

8 Q. When were those rules adopted?

9 A. Well, we had rules in 2012, I  
10 guess it was, when we had redistricting. And  
11 we had them again this time around. I guess it  
12 was '11 and then '21. I could not recite them  
13 for you, but I know those generally are the  
14 principles. I learned about it first though  
15 back when the maps were struck down that the  
16 Democrats had drawn. That's when I learned  
17 some of the things they were struck down on or  
18 that were challenged when I came into the --  
19 into the legislature, things like compactness,  
20 similar size, that those were problems and led  
21 to those maps being struck down.

22 Q. Were there ever any presentations  
23 made to yourself or a group of legislators that

1 discussed these considerations for  
2 redistricting?

3 A. I didn't participate in them.

4 Q. So primarily your knowledge with  
5 relation to what should be considered is from  
6 the rules that you mentioned and from the -- I  
7 think you're referencing the 2000 maps?

8 A. Yes. And just in general, you  
9 know, reading about it, you know, being up to  
10 date on just current events.

11 Q. You also did some of your own  
12 research?

13 A. I mean, I read the newspapers.

14 Q. And the rules that were adopted,  
15 who drafted those?

16 A. I think they were almost if not  
17 the same, the same ones from 2010. So I would  
18 imagine it was the Chairman at the time.

19 Q. Are you aware of any changes to  
20 the rules between 2010 and current?

21 A. I don't remember if they changed.

22 Q. Were any other materials aside  
23 from the rules ever given to you that had any

1 Q. Yes. So I will represent to you  
2 that this is the October 21 plan set forth by  
3 the -- or put forward by the Democrat Caucus.

4 A. Okay.

5 Q. Have you seen this map before?

6 A. I imagine I -- I expect I did look  
7 at it.

8 Q. Okay. Do you recall when you  
9 first saw it?

10 A. I do not.

11 Q. And do you recall being presented  
12 with this map prior to it being released in  
13 October?

14 A. I don't -- I don't remember. I  
15 don't recall. I don't think I was.

16 Q. Okay. When it was released on  
17 October 21, did you review that map?

18 A. I mean, I looked at it. I'm sure  
19 I reviewed it and looked at it as input about  
20 like I did the Senate's.

21 Q. Did you consider any specific  
22 redistricting criteria when you looked at it  
23 other than compliance with the Voting Rights

1 Act and population within one to two people?

2 A. I didn't evaluate it enough to --  
3 either of them really to come to any  
4 conclusions.

5 Q. Did you have any communications  
6 with anyone -- strike that.

7 Did you have any communications with other  
8 legislators about this map?

9 A. I don't recall having any  
10 conversations with any, including the  
11 Democrat Caucus that released it.

12 Q. Okay. And did you hear from any  
13 constituents about this map?

14 A. I may have. But I don't remember.

15 Q. Okay.

16 A. A lot of this is just kind of  
17 Inside Baseball. I mean, I don't know how many  
18 constituents are like have you looked at map A,  
19 have you looked at map B. I mean...

20 Q. Okay. Is it consistent with your  
21 recollection that on September 23, 2021  
22 Governor Kemp signed a proclamation ordering a  
23 special legislative session?

1 other than Chair Rich for the --

2 A. Speaker Ralston.

3 Q. Okay. And SB 2EX is the  
4 congressional redistricting plan that  
5 ultimately was voted and approved or enacted.  
6 Okay? Sorry. Okay. And that plan was first  
7 considered during the special legislative  
8 session. Do you remember what day it was  
9 introduced?

10 A. I don't.

11 Q. If I represent to you that the  
12 plan was introduced on November 17, 2021, would  
13 that sound correct to you?

14 A. I have no reason to not believe  
15 that.

16 Q. Do you recall if the plan was  
17 first considered the same day that it was  
18 released?

19 A. You mean considered by the  
20 Committee?

21 Q. Yes.

22 A. I mean, I don't -- I don't  
23 remember the exact day. But I have no reason

1 to believe it was or wasn't.

2 Q. And when the plan was introduced,  
3 what exactly did the Committee do in order to  
4 consider it prior to voting it out of  
5 Committee?

6 A. I imagine, I assume, that the  
7 Chairman -- my recollection is the Chairman and  
8 Speaker leadership made sure that it met the  
9 legal requirements to be a legal map.

10 Q. Okay. Was there hearings held on  
11 this map?

12 A. I -- you mean like specific  
13 hearings on the map? I don't remember.

14 What -- what day did we vote the final map?

15 Q. I can represent to you that it was  
16 voted out of the House Committee, sorry, on  
17 November 20.

18 A. There you go. We probably didn't  
19 have too many hearings.

20 Q. In your experience from the prior  
21 redistricting session, is that a typical  
22 timeline?

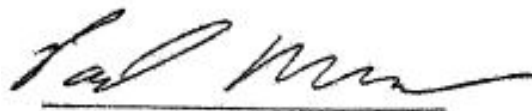
23 A. That doesn't surprise me.



REPORTER'S CERTIFICATE

I, Paul Morse, Certified Court Reporter and Commissioner for the State of Alabama at Large, do hereby certify that the above and foregoing proceedings was taken down by me by stenographic means, and that the content herein was produced in transcript form by computer aid under my supervision, and that the foregoing represents, to the best of my ability, a true and correct transcript of the proceedings occurring on said date and at said time.

I further certify that I am neither of kin nor of counsel to the parties to the action nor in any manner interested in the result of said case.

A handwritten signature in black ink, appearing to read "Paul Morse", is written over a horizontal line.

Paul Morse, CCR

ACCR #588 Expires 9/30/23

# EXHIBIT 34

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

GEORGIA STATE CONFERENCE  
OF THE NAACP; GEORGIA  
COALITION FOR THE PEOPLE'S  
AGENDA, INC.; GALEO LATINO  
COMMUNITY DEVELOPMENT FUND,  
INC.,

CIVIL ACTION NO.

Plaintiffs,

1:21-CV-5338-ELB-  
SCJ-SDG

vs.

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 DEPOSITION OF REP. BARRY FLEMING  
APPEARING REMOTE FROM  
ATLANTA, GEORGIA

JANUARY 19, 2023

9:09 A.M.

Reported Remotely By:  
Judith L. Leitz Moran  
RPR, RSA, CCR-B-2312

1 be moved out of your district?

2 A For the most part, the precincts were,  
3 yes.

4 Q Okay. How did you go about deciding  
5 which precincts should be moved out of your  
6 district?

7 A There were representatives adjacent to me  
8 that needed people and -- and it was fairly easy to  
9 give them away to other representatives.

10 Q And were you the one that decided then --  
11 you know, when -- when you made your  
12 recommendations to Representative Rich -- was that  
13 just your, you know, looking at maps and deciding  
14 here is where I should lose precincts or how did  
15 you go about that process?

16 A What you said is correct, I looked at  
17 maps.

18 Q Okay. Did you have discussions with  
19 anyone else other than Representative Rich?

20 A Counsel.

21 Q And when you say "counsel," who are you  
22 referring to?

23 A Bryan Tyson.

24 Q And what was Mr. Tyson's role?

25 A Counsel.

1 Q Counsel to who?

2 A For the redistricting process.

3 Q So counsel to the legislative and  
4 congressional reapportionment committee?

5 A I'm not exactly sure what his title was,  
6 but -- but he was -- he was the counsel I spoke  
7 with.

8 Q And what types of -- just by category,  
9 what types of issues was Mr. Tyson engaged to give  
10 advice to someone, whether it was the committee or  
11 someone else, on?

12 A I'm not sure what he was engaged -- what  
13 his engaged agreement consisted of, but for me, I  
14 spoke with him about my district and which  
15 precincts I might lose.

16 Q And -- and what legal topics were you  
17 discussing with him? I don't -- I don't want the  
18 content, I just want to know kind of by broad  
19 subject matter what the areas that -- that you were  
20 seeking Mr. Tyson's legal advice for.

21 A How many people I had to lose, how close  
22 I could be to the approximately 60,000 figure mark.  
23 Those were some of the things we discussed.

24 Q Okay. Were there other topics, you know,  
25 general topics that you discussed?

1 Q So on a net basis you had to lose roughly  
2 20 percent of your population?

3 A I went to law school because I didn't do  
4 math. I trust you that you're close.

5 Q Close is certainly definitely right.  
6 Hold on. Just give me one second. Just  
7 give me one second. I'm trying to find where I  
8 was. Hang on.

9 Were you familiar with the congressional  
10 -- proposed congressional maps that I think were  
11 introduced by Duncan -- you know, Lieutenant  
12 Governor and -- and Senator Kennedy?

13 A I'm sure at some point I saw them if they  
14 introduced them, but I don't remember much about  
15 them.

16 Q Okay. And were -- did you participate in  
17 any discussions or meetings about that proposed  
18 map?

19 A If it was brought up at our hearings, I  
20 would have, yes, but I don't remember if it was.

21 Q Okay. And aside from your -- aside from  
22 anything that happened at the hearing, you don't  
23 remember any conversations about those?

24 A That's correct.

25 Q Do you have any understanding as to why

1 Q Okay. If you'll give me one moment.

2 MS. HSU: All right, thank you so much,  
3 Representative Fleming, I have no more questions  
4 from the Georgia NAACP.

5 I pass the witness to anyone else that  
6 might.

7 MR. JAUGSTETTER: Is there anyone on Zoom  
8 that has any questions?

9 MR. JONES: The Pendergrass and Grant  
10 Plaintiffs do not have any questions for  
11 Representative Fleming.

12 MS. MILLER: Hi, yes, ACLU, Kelsey Miller  
13 representing Alpha Phi Alpha, we do have some  
14 questions.

15 MR. JAUGSTETTER: Okay.

16 EXAMINATION

17 BY MS. MILLER:

18 Q I'll just turn my camera on for  
19 Representative Fleming.

20 Hi, Mr. Fleming.

21 A Good morning.

22 Q Good morning.

23 Did the house committee consider any  
24 other versions of -- of the maps proposed by any  
25 other groups such as the House Democratic Caucus?

1           A     Yes.

2           Q     And do you recall if any of those  
3     alternative maps contained additional majority  
4     Black districts beyond those in the prior maps?

5           A     I do not recall that specifically, and  
6     although, they very well could have.

7           Q     And do you recall if they had any  
8     additional majority Black districts compared to the  
9     enacted map?

10          A     I do not recall specifically.

11          Q     I believe you -- you mentioned earlier  
12     that -- that town halls were held prior to votes on  
13     the enacted maps; is that correct?

14          A     I call them public hearings, but I think  
15     the last attorney did refer to them as town halls.

16          Q     Okay. Were any of those public hearings  
17     held in majority Black regions of the state?

18          A     Yes.

19          Q     Do you -- do you just recall offhand what  
20     -- where those were?

21          A     In the Augusta area, the Atlanta area,  
22     the Albany area as best I can recall were some of  
23     them. And maybe even in Macon. Or that could have  
24     been one of the ones that got canceled during the  
25     weather, I can't remember.



C E R T I F I C A T E

Deposition of: REP. BARRY FLEMING

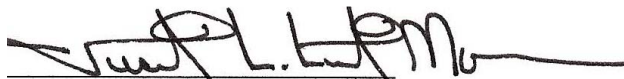
Date of Deposition: JANUARY 19, 2023

STATE OF GEORGIA:

I hereby certify that the foregoing transcript was stenographically recorded by me via Zoom as stated in the caption. The deponent was duly sworn to tell the truth, the whole truth, and nothing but the truth. And the colloquies, statements, questions and answers thereto were reduced to typewriting under my direction and supervision and the deposition is a true and correct record, to the best of my ability, of the testimony/evidence given by the deponent.

I further certify that I am not a relative or employee or attorney or counsel to any of the parties in the case, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in the action.

This, the 3rd day of February 2023.

A handwritten signature in black ink, appearing to read "Judith L. Leitz Moran", written over a horizontal line.

Judith L. Leitz Moran, CCR-B-2312

Registered Professional Reporter

# EXHIBIT 35

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 not impaired by the map drawing process.

2 Q To your understanding, does the Voting Rights  
3 Act allow a state legislature to consider race in  
4 determining the boundaries of voting districts?

5 A I know that -- it's my understanding that in  
6 drawing the boundaries for districts in the redistricting  
7 process, that it cannot be done in a way that unfairly  
8 affects minorities.

9 Q How would the drawing be done in a way that  
10 unfairly affects minorities?

11 A Well, we talked about packing and cracking, and  
12 I understand and think that those are two concepts in  
13 which the process -- and I guess it's -- it's somewhat  
14 the process, but I guess it's more ultimately what the  
15 actual map looks like at the end that someone would be  
16 asked to meet or how the electoral votes, that that --  
17 that ultimate map that's utilized needs to be fair. It  
18 needs to be constitutional. It needs to be compliant  
19 with the Voting Rights Act, and again, as I've said, is  
20 otherwise appropriate.

21 Q To your understanding, does the Voting Rights  
22 Act require a state legislature to consider race in  
23 determining the boundaries of voting districts?

24 A When you say consider race, yes, I think it --  
25 I think it's one of the aspects that's a part of the

1 process that has to be, I would say, observed and  
2 respected.

3 Q And what consideration specifically is required  
4 of race?

5 A See, now you are pulling me in to try to give  
6 you a legal opinion about the statutes and -- and all of  
7 that, and that's -- I'm not -- I don't think that's why  
8 I'm here today. I think I'm here as a fact witness.

9 Q Okay. So do you have -- so you don't have any  
10 independent understanding of the legal requirements of  
11 the Voting Rights Act not informed by counsel?

12 A No, I didn't say that, but I think I'm here to  
13 give you answers to your factual questions, not render  
14 legal opinions about how I think certain United States or  
15 Georgia laws apply or don't apply.

16 Q You don't think the application of those laws  
17 is important to the Senate Committee's work in  
18 redistricting?

19 A What I said was how they are applied, not  
20 whether they are applied. So there's no question but  
21 that they do apply. Your questions have now trended off  
22 into how they apply, and you are asking for me to give  
23 you legal opinions or answer questions about my knowledge  
24 of specific laws, and I don't think that's why I am here,  
25 am I?

1 Q It does.

2 A Okay.

3 Q And so in that -- in that example you gave,  
4 there could be -- you were saying there is a similarity  
5 in interests between the folks in Northwest Georgia  
6 related to transportation, correct?

7 A Yes. Uh-huh. Based upon geographic  
8 limitations, which is the -- what you asked about.

9 Q Would you agree that some communities of  
10 interest in Georgia share an interest based on race or  
11 ethnicity?

12 A Yes.

13 Q Why would -- why do you agree?

14 A Just the common interest, commonality of  
15 culture, commonality of history. I think those factors  
16 and -- and others could create and does create  
17 communities of interest.

18 Q Would you say that communities of interest seek  
19 similar policy objectives?

20 A I would think they certainly can. I don't -- I  
21 don't know that I would agree that any kind of community  
22 of interest therefore de facto always have the same  
23 principles or the same values. You know, so I wouldn't  
24 take it to an extreme. But to some degree and in some  
25 regards, yes, I think that would be correct.

1       that the cores of the prior districts be preserved as  
2       much as possible?

3           A     I don't remember me telling her that. I do  
4       remember there being -- that being a consideration of  
5       what we were doing. You know, I probably knew enough by  
6       that time to know that that wasn't -- that was a  
7       principle that we wanted to respect. Being a little more  
8       candid, it probably was her telling me more about it than  
9       me telling her about it, from a -- from a expertise  
10      information base. But yes, I do remember a discussion of  
11      that.

12           Q     Did you ask her to consider partisan data in  
13      creating the first draft congressional map?

14           A     I don't remember if it was in the first draft,  
15      but partisan consideration was a -- at times a part of  
16      the process.

17           Q     And how was it part of the process?

18           A     In looking at her work on forming certain  
19      districts, the proposed district or district area of what  
20      would be the partisan split or presumed partisan split or  
21      assumptions about that.

22           Q     Did -- do you know what data she was reviewing  
23      when she told you how a district would tend to -- to vote  
24      from a partisan perspective?

25           A     I believe she was relying on historical voting

1 Q BY MS. LIU: And is that how you determine  
2 whether a candidate can -- or sorry. I'll restart.

3 Is asking whether a group can get to 50 percent  
4 plus 1 of the votes how you determine whether that group  
5 can elect a candidate of their choice?

6 A Are we talking about a hypothetical group and a  
7 hypothetical election?

8 Q I am asking you how you would determine whether  
9 a group can elect a candidate of their choice.

10 A I think it's the same as any group that wants  
11 to be cohesive or together or however they're voting.  
12 You have to get 50 percent plus 1.

13 Q Okay. We now have a video to play for you. My  
14 colleague will be playing you a video in the room. This  
15 is excerpts from the Senate Committee on Reapportionment  
16 and Redistricting from November 4th, 2021, starting at 8  
17 minutes and 55 seconds.

18 (Court reporter clarification.)

19 Playing video:

20 "We heard from the NCSL. We heard from the  
21 Georgia Democratic Party. We heard from the Georgia  
22 NAACP. We heard from other groups that came and  
23 addressed us that day.

24 "Fifth, we laid out our guidelines on  
25 August the 30th when most of the members came and met



1 here that would govern the drawing of the maps. Those  
2 guidelines focused on the constitutional requirements of  
3 equal protection, compliance with the Voting Rights Act,  
4 including a recognition of racially polarized voting, and  
5 then the importance of jurisdictional boundaries  
6 prioritizing communities of interest, compactness, and  
7 contiguity.

8 "Sixth, we saw the Democratic Senate plan and  
9 appreciated the input provided by the minority party.

10 "Seventh, we combined all of this in the form  
11 of our input, including some of the districts on the  
12 Democratic plan, and with the staff of the  
13 Reapportionment Office to come up with the draft that is  
14 what we have in your folders and what we're gonna be  
15 presenting today.

16 "We released a draft of this map on Tuesday,  
17 two days ago, to allow time for some comment, and we've  
18 made a few basic adjustments based on the input that I  
19 have received from various committee members.

20 "So, let's talk about what's here. Well, first  
21 of all, the responsibility and the respect for our  
22 constitution to make sure that our first responsibility  
23 is to balance the population pursuant to the direction of  
24 the U.S. Constitution. While a lot of people think this  
25 process is all political driven, the truth is, and the

1 beginning point for all of this is, the population  
2 numbers of the state that are collected, calculated every  
3 ten years, which necessitate a redrawing of the lines.

4 "Districts have to be substantially the same  
5 size, and we have generally drawn the districts for the  
6 Senate districts with the deviation of plus or minus of  
7 no more than 1 percent on the draft plan that you have  
8 before you. We have also endeavored and ensured that we  
9 have complied with the Voting Rights Act, creating  
10 majority-minority districts and new minority opportunity  
11 districts.

12 "This map has 14 districts that are majority  
13 black VAP districts. It has 20 districts that are  
14 majority nonwhite VAP, voting age population. So we have  
15 six minority opportunity districts in addition to the  
16 majority black districts.

17 "We have also been very respectful of and  
18 considerate of communities of interest and trying to not  
19 divide counties. 20 years ago, the 2021 Senate districts  
20 that were drawn by the Democrats that were in power at  
21 the time and were in charge of the map drawing process  
22 split 81 of our counties into 56 districts."

23 (End of video.)

24 Q BY MS. LIU: Senator Kennedy, was that you  
25 speaking in the video?

STATE OF GEORGIA                   )  
                                       )       ss:  
COUNTY OF DEKALB               )

I FURTHER CERTIFY that I am in no way related to, nor employed by any of the parties hereto, nor am I in any way interested in the outcome.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

MARCELLA L. DAUGHTRY, RPR, RMR

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# EXHIBIT 36

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

GEORGIA STATE CONFERENCE )  
OF NAACP, et al., )  
Plaintiffs, )  
vs. ) CASE NO.  
STATE OF GEORGIA, et al., ) 1:21-CV-5338  
Defendants. )

VIDEOTAPED DEPOSITION OF DANIEL J. O'CONNOR, III  
(Taken by Plaintiffs)  
March 17, 2023  
9:35 a.m.

Reported by: Debra M. Druzisky, CCR-B-1848

1 date, they could pull up the map and see what they  
2 had previously done?

3 A. Right. That would be possible, yes.  
4 Uh-huh.

5 Q. And are those folders a part of the  
6 Maptitude program or are they saved in, like, a  
7 separate members' folders kind of repository?

8 A. Well, they have, like, folders under -- in  
9 our Maptitude system so you can, you know, save  
10 maps to their folders, yes.

11 Q. Okay. And so when you're in the room and  
12 you're creating maps and post-census data in 2021  
13 and it's displayed on the wall, what type of data  
14 is, you know, depicted on the wall with respect to  
15 Maptitude?

16 A. There's, you know, population, voting age  
17 population, racial demographic data.

18 Q. Okay. And as I understand it in  
19 Maptitude, when you are making a change to a  
20 district, there's a little summary that will pop up  
21 and will show you how that affects the demographics  
22 or maybe the racial make-up in that district.

23 Is that true?

24 A. Right. Uh-huh.

25 Q. All right. And you mentioned previously

1 R E P O R T E R C E R T I F I C A T E  
2 STATE OF GEORGIA )  
3 COBB COUNTY )  
4

5 I, Debra M. Druzisky, a Certified Court  
6 Reporter in and for the State of Georgia, do hereby  
7 certify:

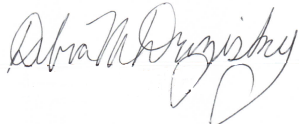
8 That prior to being examined, the witness  
9 named in the foregoing deposition was by me duly  
10 sworn to testify to the truth, the whole truth, and  
11 nothing but the truth;

12 That said deposition was taken before me  
13 at the time and place set forth and was taken down  
14 by me in shorthand and thereafter reduced to  
15 computerized transcription under my direction and  
16 supervision. And I hereby certify the foregoing  
17 deposition is a full, true and correct transcript  
18 of my shorthand notes so taken.

19 Review of the transcript was requested.  
20 If requested, any changes made by the deponent and  
21 provided to the reporter during the period allowed  
22 are appended hereto.

23 I further certify that I am not of kin or  
24 counsel to the parties in the case, and I am not in  
25 the regular employ of counsel for any of the said  
parties, nor am I in any way financially interested  
in the result of said case.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name this 31st day of March, 2023.



Debra M. Druzisky  
Georgia CCR-B-1848

# EXHIBIT 37



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

GEORGIA STATE CONFERENCE OF THE NAACP, et al.	)	
	)	
<i>Plaintiffs,</i>	)	Case No. 1:21-CV-5338-
	)	ELB-SCJ-SDG
v.	)	
	)	
STATE OF GEORGIA, et al.	)	
	)	
<i>Defendants.</i>	)	
	)	
<hr style="width: 50%; margin-left: 0;"/>	)	
COMMON CAUSE, et al.,	)	Case No. 1:22-CV-
	)	00090-ELB-SCJ-SDG
<i>Plaintiffs,</i>	)	
v.	)	
	)	
BRAD RAFFENSPERGER	)	
	)	
<i>Defendant.</i>	)	

**NOTICE OF ERRATA TO DR. MOON DUCHIN JANUARY 13, 2023**  
**EXPERT REPORT**

## Errata and Clarifications

Moon Duchin  
Professor of Mathematics, Tufts University  
Senior Fellow, Tisch College of Civic Life

April 26, 2023

I submit the information below to correct typographical errors and offer selected clarifications from my January 13, 2023 Expert Report and related materials. Nothing presented here changes any of my ultimate findings and conclusions. Additionally, valid information in every statistical category was available in the backup materials filed with the January 13 report.

1. At the beginning of the report (page 2), the date should be January 13, 2023 rather than January 13, 2022.
2. Table 8 (page 21) should be amended as follows. It previously mis-reported the compactness statistics for CD Alt, HD Alt Eff 1, and HD Alt Eff 2. Only those three rows are affected. My general finding that CD Alt is more compact than the enacted plan, while HD Alt Eff 1 and HD Alt Eff 2 are comparable in compactness, is unchanged. Additionally, the compactness numbers appearing elsewhere in the report, notably the detailed statistics in Table 11, were correct.

	<b>avg Polsby-Popper</b> (higher is better)	<b>avg Reock</b> (higher is better)	<b>Block cut edges</b> (lower is better)
<b>BenchmarkCD</b>	0.238	0.452	5775
<b>EnactedCD</b>	0.267	0.441	5075
<b>DuncanKennedy</b>	0.295	0.471	4665
<b>CD Alt</b>	0.301	0.473	4665
<b>BenchmarkSD</b>	0.250	0.421	12,549
<b>EnactedSD</b>	0.287	0.418	11,005
<b>SD Alt Eff 1</b>	0.287	0.427	10,897
<b>SD Alt Eff 2</b>	0.296	0.440	10,349
<b>SD Alt Eff 3</b>	0.295	0.431	10,479
<b>BenchmarkHD</b>	0.244	0.382	24,001
<b>EnactedHD</b>	0.278	0.391	22,014
<b>HD Alt Eff 1</b>	0.261	0.391	21,843
<b>HD Alt Eff 2</b>	0.263	0.399	21,907
<b>HD Alt Eff 3</b>	0.279	0.403	20,917

Table 8: Compactness scores for each plan submitted with January 13 Report.

3. Table 9 (page 22) can be clarified as follows. Some splits of a political unit separate the territory but do not separate the population, for instance if an unpopulated block or an unpopulated spur is assigned to a different district from the bulk of the unit.

To reduce this ambiguity, I am providing very slightly modified assignment files for two of my demonstrative plans, namely **CD Alt** and **SD Alt Eff 1**. These differ from the plans provided with the January 13 report only by reassigning a small number of zero-population blocks so that the **county splits and county pieces** count becomes the same whether counting splits of territory or only splits of population.

The changes to these two plans only serve to disambiguate the splits statistics and make no meaningful change to compactness, demographics, effectiveness, or any other element of the analysis.

Finally, I note for the record that three counties in Georgia are actually themselves made up of discontinuous territory by the usual definition of contiguity, which disallows point-connected or corner-connected regions. (In particular, the state's redistricting guidelines state explicitly that "Districts that connect on a single point are not contiguous.") However, there are two counties (Upson and Taylor) that are only point-connected, and a third (Brooks County) that is wholly discontinuous. In each case, the county's failure of contiguity is caused by a single unpopulated block. This is not uncommon around the country. It is standard practice for plans that separate such a block from the rest of the county to not incur an additional split; this allows the districts to remain contiguous by the strictest definition.

4. In §7 of the January 13 Report, images for the cluster-level alternative plans are shown on pages 26-39. In some cases the captions below the images under-report the number of majority-minority districts. For convenience, I will report amended figures for all of those counts here in one place.

- SD Atlanta: **Enacted** 7/8/8; **Alt 1** 10/10/10; **Alt 2** 8/9/9
- SD Gwinnett: **Enacted** 3/4/4; **Alt 1** 5/7/6
- SD East Black Belt: **Enacted** 2/2/2; **Alt 1** 3/3/3; **Alt 2** 2/3/3
- HD Atlanta: **Enacted** 18/18/18; **Alt 1** 20/20/20; **Alt 2** 19/20/20
- HD Southwest: **Enacted** 6/6/6; **Alt 1** 8/8/8
- HD East Black Belt: **Enacted** 7/7/7; **Alt 1** 8/9/9; **Alt 2** 8/8/8
- HD Southeast: **Enacted** 1/4/4; **Alt 1** 0/4/4; **Alt 2** 0/5/5

5. In Appendix B, three of the tables mistakenly presented information for the state's Enacted plans labeled as though it was for the alternative plans (SD Alt Eff 2, Table 52, page 94; HD Alt Eff 1, Table 53, pages 95-97; and HD Alt Eff 2, Table 54, pages 98-100). The amended tables follow below.

These amended tables are consistent with the summary statistics in Table 10 (page 23) on the number of effective districts. SD Alt Eff 2 has +4 effective districts relative to SD Enacted. HD Alt Eff 1 has +9 effective and HD Alt Eff 2 has +11 effective districts relative to HD Enacted.

SD Enacted					SD Alt Eff 2				
SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	SD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	25.1%	32.6%	3	0	1	25.1%	32.6%	3	0
2	46.9%	54.4%	4	8	2	46.9%	54.4%	4	8
3	21.2%	27.4%	3	0	3	21.2%	27.4%	3	0
4	23.4%	28.9%	3	0	4	23.4%	28.9%	3	0
5	29.9%	71.6%	3	8	5	24.1%	59.8%	3	8
6	23.9%	32.1%	0	8	6	28.0%	42.9%	3	8
7	21.4%	38.0%	3	8	7	25.4%	47.3%	3	8
8	30.4%	36.6%	4	0	8	30.4%	36.6%	4	0
9	29.5%	48.3%	3	8	9	37.6%	54.3%	4	8
10	71.5%	76.7%	4	8	10	59.7%	69.5%	4	8
11	31.0%	38.6%	4	0	11	31.0%	38.6%	4	0
12	58.0%	61.5%	4	8	12	58.0%	61.5%	4	8
13	27.0%	33.0%	4	0	13	27.0%	33.0%	4	0
14	19.0%	31.1%	0	8	14	18.1%	27.1%	0	7
15	54.0%	60.6%	4	8	15	54.0%	60.6%	4	8
16	22.7%	27.7%	3	0	16	48.4%	54.5%	4	8
17	32.0%	37.1%	3	0	17	46.4%	52.1%	4	7
18	30.4%	34.9%	3	0	18	30.4%	34.9%	3	0
19	25.7%	34.1%	4	0	19	25.7%	34.1%	4	0
20	31.3%	34.8%	3	0	20	32.5%	37.4%	3	0
21	7.5%	16.3%	2	0	21	7.5%	16.3%	2	0
22	56.5%	61.8%	4	8	22	50.4%	53.9%	4	8
23	35.5%	40.0%	3	0	23	47.4%	51.5%	3	8
24	19.9%	24.3%	3	0	24	23.1%	28.7%	3	0
25	33.5%	37.2%	3	0	25	28.2%	32.7%	3	0
26	57.0%	61.2%	3	8	26	51.2%	54.3%	3	8
27	5.0%	15.2%	0	0	27	5.0%	15.2%	0	0
28	19.5%	25.9%	2	0	28	15.8%	21.9%	2	0
29	26.9%	31.4%	3	0	29	26.9%	31.4%	3	0
30	20.9%	27.0%	2	0	30	15.7%	22.3%	1	0
31	20.7%	28.1%	3	0	31	25.9%	32.6%	3	0
32	14.9%	25.4%	3	0	32	14.9%	25.4%	3	0
33	43.0%	65.9%	4	8	33	50.6%	68.8%	4	8
34	69.5%	82.2%	4	8	34	54.4%	66.3%	4	8
35	71.9%	79.4%	4	8	35	60.9%	68.4%	4	8
36	51.3%	58.4%	3	8	36	54.0%	60.8%	3	8
37	19.3%	28.0%	3	0	37	19.3%	28.0%	3	0
38	65.3%	73.7%	4	8	38	51.0%	56.6%	3	8
39	60.7%	66.3%	3	8	39	86.5%	92.0%	4	8
40	19.2%	40.8%	0	8	40	19.0%	45.8%	0	8
41	62.6%	69.3%	3	8	41	63.6%	70.8%	3	8
42	30.8%	39.4%	0	8	42	17.0%	27.7%	0	8
43	64.3%	71.2%	4	8	43	55.6%	61.9%	4	8
44	71.3%	79.9%	4	8	44	76.3%	79.5%	3	8
45	18.6%	31.7%	3	0	45	15.1%	27.8%	3	0
46	16.9%	23.9%	1	0	46	14.7%	21.5%	1	0
47	17.4%	27.0%	3	0	47	18.4%	27.5%	2	7
48	9.5%	16.5%	1	0	48	10.5%	19.7%	1	3
49	8.0%	29.9%	1	0	49	7.5%	31.0%	1	0
50	5.6%	14.4%	1	0	50	6.5%	12.7%	2	0
51	1.2%	5.5%	0	0	51	1.2%	5.5%	0	0
52	13.0%	21.2%	1	0	52	13.0%	21.2%	1	0
53	5.1%	8.3%	1	0	53	5.1%	8.3%	1	0
54	3.8%	26.4%	1	0	54	3.8%	26.4%	1	0
55	66.0%	74.7%	4	8	55	57.0%	66.0%	4	8
56	7.6%	15.3%	0	0	56	7.6%	15.3%	0	0

Table 52: Demographics and effectiveness for SD Alt Eff 2, shown side-by-side with SD Enacted for convenience.

HD	HD Enacted				HD	HD Alt Eff 1 Part 1			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8		BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	4.2%	6.3%	1	0	1	4.2%	6.3%	1	0
2	3.2%	10.8%	1	0	2	3.2%	10.8%	1	0
3	3.4%	6.4%	1	0	3	3.4%	6.4%	1	0
4	5.4%	49.5%	2	0	4	5.4%	49.5%	2	0
5	4.6%	17.2%	1	0	5	4.6%	17.2%	1	0
6	1.5%	13.5%	1	0	6	1.5%	13.5%	1	0
7	0.6%	6.1%	0	0	7	0.6%	6.1%	0	0
8	1.4%	4.1%	0	0	8	1.4%	4.1%	0	0
9	1.6%	6.3%	0	0	9	1.6%	6.3%	0	0
10	3.7%	13.7%	1	0	10	3.7%	13.7%	1	0
11	1.8%	6.0%	0	0	11	1.8%	6.0%	0	0
12	9.7%	15.9%	1	0	12	9.7%	15.9%	1	0
13	19.2%	30.0%	1	0	13	19.2%	30.0%	1	0
14	6.8%	12.7%	2	0	14	6.8%	12.7%	2	0
15	14.2%	23.9%	2	0	15	14.2%	23.9%	2	0
16	11.7%	20.3%	3	0	16	11.7%	20.3%	3	0
17	23.0%	29.9%	2	0	17	23.0%	29.9%	2	0
18	8.0%	10.4%	2	0	18	8.0%	10.4%	2	0
19	24.1%	30.9%	3	0	19	24.1%	30.9%	3	0
20	9.3%	18.5%	1	0	20	7.6%	14.7%	1	0
21	5.1%	12.5%	1	0	21	5.1%	12.6%	1	0
22	15.1%	26.7%	3	0	22	23.9%	35.3%	3	5
23	6.5%	20.7%	1	0	23	6.5%	20.7%	1	0
24	7.0%	17.3%	1	0	24	5.2%	13.1%	1	0
25	5.9%	11.0%	0	0	25	7.0%	11.8%	0	0
26	4.0%	14.8%	0	0	26	4.7%	14.3%	0	0
27	3.7%	13.3%	1	0	27	3.7%	13.3%	1	0
28	3.9%	15.3%	0	0	28	3.9%	15.3%	0	0
29	13.6%	53.3%	2	0	29	13.3%	55.2%	2	0
30	8.1%	24.2%	0	0	30	7.1%	22.2%	1	0
31	7.6%	26.5%	1	0	31	7.6%	26.5%	1	0
32	8.0%	12.9%	2	0	32	8.0%	12.9%	2	0
33	11.2%	14.3%	3	0	33	18.7%	22.5%	3	0
34	15.7%	23.5%	3	0	34	13.0%	19.9%	3	0
35	28.4%	39.6%	3	8	35	22.5%	32.7%	3	5
36	17.0%	23.5%	3	0	36	16.0%	27.0%	3	5
37	28.2%	46.8%	3	8	37	30.0%	53.6%	3	8
38	54.2%	66.8%	4	8	38	43.7%	52.9%	4	8
39	55.3%	74.0%	4	8	39	45.5%	62.6%	4	8
40	33.0%	38.9%	3	8	40	42.9%	51.7%	3	8
41	39.4%	68.0%	4	8	41	39.2%	53.4%	3	8
42	33.7%	51.1%	3	8	42	33.9%	55.9%	3	8
43	26.5%	40.6%	3	8	43	35.7%	52.1%	3	8
44	12.0%	22.5%	2	0	44	13.4%	28.1%	2	0
45	5.3%	10.2%	0	0	45	7.4%	13.0%	0	0
46	8.1%	15.5%	0	0	46	7.2%	14.3%	0	0
47	10.7%	18.1%	2	0	47	13.3%	23.5%	3	5
48	11.8%	24.2%	0	1	48	11.1%	18.2%	0	1
49	8.4%	15.1%	0	0	49	6.4%	11.6%	0	0
50	12.4%	18.8%	2	8	50	12.5%	19.7%	2	7
51	23.7%	37.0%	0	8	51	25.1%	44.2%	3	8
52	16.0%	23.4%	0	8	52	13.0%	20.0%	0	7
53	14.5%	21.9%	0	1	53	15.7%	26.9%	0	6
54	15.5%	28.3%	0	7	54	14.7%	23.5%	0	4
55	55.4%	60.4%	3	8	55	51.3%	56.7%	3	8
56	45.5%	51.3%	3	8	56	45.8%	51.3%	3	8
57	18.1%	26.1%	0	8	57	17.9%	25.9%	0	8
58	63.0%	68.1%	3	8	58	52.3%	58.2%	2	8
59	70.1%	74.5%	3	8	59	91.8%	94.5%	4	8
60	63.9%	69.0%	3	8	60	59.3%	65.4%	3	8

HD	HD Enacted				HD	HD Alt Eff 1 Part 2			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8		BVAP	BHVAP	Primaries out of 4	Generals out of 8
61	74.3%	81.9%	4	8	61	50.1%	60.1%	4	8
62	72.3%	79.1%	3	8	62	81.7%	89.0%	3	8
63	69.3%	78.6%	3	8	63	57.5%	66.5%	3	8
64	30.7%	38.1%	3	0	64	50.9%	57.4%	4	8
65	62.0%	66.5%	4	8	65	81.7%	86.4%	4	8
66	53.4%	62.9%	4	8	66	51.0%	60.0%	4	8
67	58.9%	66.7%	4	8	67	89.9%	95.3%	4	8
68	55.7%	62.0%	4	8	68	13.7%	20.3%	3	0
69	63.6%	69.0%	4	8	69	51.9%	60.7%	4	8
70	27.8%	35.8%	3	0	70	27.8%	35.8%	3	0
71	19.9%	26.1%	3	0	71	19.9%	26.1%	3	0
72	20.9%	27.8%	1	0	72	20.9%	27.8%	1	0
73	12.1%	19.1%	2	0	73	11.8%	18.2%	2	0
74	25.5%	31.1%	3	0	74	50.8%	57.7%	4	8
75	74.4%	85.7%	4	8	75	54.2%	61.9%	4	8
76	67.2%	80.4%	4	8	76	61.6%	81.6%	4	8
77	76.1%	88.3%	4	8	77	89.6%	94.6%	4	8
78	71.6%	80.5%	4	8	78	64.2%	75.5%	4	8
79	71.6%	87.6%	4	8	79	73.3%	87.9%	4	8
80	14.2%	37.3%	0	8	80	23.6%	61.7%	0	8
81	21.8%	42.7%	0	8	81	22.6%	52.5%	0	8
82	16.8%	23.6%	0	8	82	11.3%	17.4%	0	8
83	15.1%	43.6%	0	8	83	14.4%	23.1%	0	8
84	73.7%	76.7%	3	8	84	78.1%	81.0%	3	8
85	62.7%	68.6%	3	8	85	52.6%	59.1%	3	8
86	75.1%	79.4%	3	8	86	92.0%	95.4%	4	8
87	73.1%	79.8%	4	8	87	57.5%	64.2%	3	8
88	63.3%	73.3%	3	8	88	62.2%	69.2%	3	8
89	62.5%	65.9%	2	8	89	66.4%	69.6%	3	8
90	58.5%	62.8%	2	8	90	58.5%	62.8%	2	8
91	70.0%	75.9%	4	8	91	50.3%	55.5%	4	8
92	68.8%	73.5%	4	8	92	87.6%	91.1%	4	8
93	65.4%	75.0%	4	8	93	62.1%	72.5%	4	8
94	69.0%	76.3%	4	8	94	81.5%	86.1%	4	8
95	67.2%	75.1%	4	8	95	47.1%	57.7%	4	8
96	23.0%	59.0%	3	8	96	26.0%	53.3%	3	8
97	26.8%	46.0%	3	8	97	23.9%	59.8%	3	8
98	23.2%	76.0%	3	8	98	23.4%	70.1%	3	8
99	14.7%	23.4%	3	3	99	16.4%	25.1%	3	5
100	10.0%	20.0%	1	0	100	9.8%	20.9%	3	0
101	24.2%	42.4%	3	7	101	21.3%	38.3%	3	6
102	37.6%	58.9%	3	8	102	39.5%	56.1%	4	8
103	16.8%	33.7%	3	0	103	15.7%	30.6%	3	0
104	17.0%	28.1%	3	0	104	16.1%	27.3%	3	0
105	29.0%	45.8%	3	6	105	34.5%	53.9%	3	8
106	36.3%	47.4%	3	7	106	26.7%	58.7%	3	8
107	29.6%	60.7%	3	8	107	30.3%	55.6%	3	8
108	18.4%	36.6%	3	6	108	37.4%	54.7%	3	8
109	32.5%	68.6%	3	8	109	29.1%	57.3%	3	8
110	47.2%	57.7%	4	8	110	42.9%	53.7%	4	8
111	22.3%	31.1%	3	0	111	24.5%	31.8%	3	0
112	19.2%	22.5%	1	0	112	19.2%	22.5%	1	0
113	59.5%	66.2%	4	8	113	51.0%	56.1%	4	8
114	24.7%	28.4%	3	0	114	32.8%	37.2%	3	0
115	52.1%	59.1%	4	8	115	50.2%	56.2%	4	7
116	58.1%	65.4%	4	8	116	54.8%	62.8%	4	8
117	36.6%	42.0%	3	0	117	51.0%	58.2%	4	8
118	23.6%	27.3%	3	0	118	23.2%	26.3%	3	0
119	13.5%	23.9%	2	0	119	13.5%	23.9%	2	0
120	14.3%	21.4%	2	0	120	14.3%	21.4%	2	0

HD	HD Enacted				HD	HD Alt Eff 1 Part 3			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8		BVAP	BHVAP	Primaries out of 4	Generals out of 8
121	9.6%	15.2%	0	0	121	9.6%	15.2%	0	0
122	28.4%	40.1%	3	8	122	28.4%	40.1%	3	8
123	24.3%	28.6%	3	0	123	13.3%	19.1%	3	0
124	25.6%	31.8%	2	0	124	28.4%	33.1%	2	0
125	23.7%	31.4%	3	0	125	24.1%	32.1%	3	0
126	54.5%	57.7%	4	8	126	52.5%	56.0%	4	8
127	18.5%	23.3%	3	0	127	14.6%	19.5%	3	0
128	50.4%	52.1%	2	4	128	50.1%	51.7%	2	6
129	54.9%	59.2%	3	8	129	51.9%	55.4%	3	8
130	59.9%	63.8%	4	8	130	54.4%	58.7%	3	8
131	17.6%	23.5%	3	0	131	27.1%	32.2%	3	0
132	52.3%	60.1%	4	8	132	53.6%	61.8%	4	8
133	36.8%	38.9%	3	0	133	48.7%	50.7%	3	8
134	33.6%	37.3%	1	0	134	33.6%	37.3%	1	0
135	23.8%	25.6%	1	0	135	23.8%	25.6%	1	0
136	28.7%	32.3%	3	0	136	28.7%	32.3%	3	0
137	52.1%	56.6%	4	8	137	51.7%	55.4%	4	8
138	19.3%	22.6%	2	0	138	19.3%	22.6%	2	0
139	20.3%	26.7%	2	0	139	20.3%	26.7%	2	0
140	57.6%	65.6%	4	8	140	57.1%	65.0%	4	8
141	57.5%	64.1%	4	8	141	53.6%	60.3%	4	8
142	59.5%	63.2%	3	8	142	50.8%	54.5%	3	8
143	60.8%	65.5%	3	8	143	52.4%	58.7%	3	8
144	29.3%	31.9%	3	0	144	50.4%	54.7%	3	8
145	35.7%	41.6%	3	0	145	23.1%	25.9%	3	0
146	27.6%	32.3%	4	0	146	23.3%	28.2%	4	0
147	30.1%	37.3%	4	0	147	31.8%	39.0%	3	0
148	34.0%	37.1%	4	0	148	38.6%	42.0%	4	0
149	32.1%	37.8%	2	0	149	32.1%	37.8%	2	0
150	53.6%	59.7%	4	8	150	51.2%	56.5%	4	4
151	42.4%	49.7%	4	0	151	51.0%	58.5%	4	8
152	26.1%	28.4%	4	0	152	34.2%	37.4%	4	0
153	67.9%	70.4%	4	8	153	52.9%	55.6%	4	7
154	54.8%	56.5%	4	7	154	50.1%	52.2%	4	5
155	35.9%	38.1%	3	0	155	35.9%	38.1%	3	0
156	30.3%	37.2%	4	0	156	30.3%	37.2%	4	0
157	24.7%	33.7%	3	0	157	24.7%	33.7%	3	0
158	31.2%	35.7%	2	0	158	31.2%	35.7%	2	0
159	24.5%	27.4%	2	0	159	22.2%	25.9%	3	0
160	22.6%	27.6%	2	0	160	26.6%	31.7%	1	0
161	27.1%	33.9%	4	0	161	42.1%	50.9%	4	8
162	43.7%	53.3%	4	8	162	39.9%	50.4%	4	8
163	45.5%	52.9%	3	8	163	44.0%	50.9%	4	8
164	23.5%	32.0%	3	0	164	12.9%	18.0%	3	0
165	50.3%	55.6%	4	8	165	47.3%	52.0%	4	8
166	5.7%	9.8%	3	0	166	7.2%	11.9%	3	0
167	22.3%	29.7%	3	0	167	20.0%	26.2%	3	0
168	46.3%	56.6%	4	8	168	45.9%	56.6%	4	8
169	29.0%	36.7%	3	0	169	24.0%	33.0%	3	0
170	24.2%	32.9%	3	0	170	26.8%	39.3%	3	0
171	39.6%	44.2%	4	0	171	51.0%	55.0%	4	6
172	23.3%	36.7%	4	0	172	25.1%	34.5%	3	0
173	36.3%	41.7%	4	0	173	35.4%	41.0%	4	0
174	17.4%	25.4%	3	0	174	17.4%	25.4%	3	0
175	24.2%	29.2%	4	0	175	21.0%	26.7%	4	0
176	22.7%	30.9%	4	0	176	23.8%	30.0%	4	0
177	53.9%	60.0%	4	7	177	53.9%	60.0%	4	7
178	14.8%	19.9%	3	0	178	14.8%	19.9%	3	0
179	27.0%	33.4%	3	0	179	32.0%	39.5%	4	0
180	18.2%	23.8%	3	0	180	17.0%	22.4%	3	0

Table 53: Demographics and effectiveness for HD Alt Eff 1, shown side-by-side with HD Enacted for convenience.

HD	HD Enacted				HD	HD Alt Eff 2 Part 1			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8		BVAP	BHVAP	Primaries out of 4	Generals out of 8
1	4.2%	6.3%	1	0	1	4.2%	6.3%	1	0
2	3.2%	10.8%	1	0	2	3.2%	10.8%	1	0
3	3.4%	6.4%	1	0	3	3.4%	6.4%	1	0
4	5.4%	49.5%	2	0	4	5.4%	49.5%	2	0
5	4.6%	17.2%	1	0	5	4.6%	17.2%	1	0
6	1.5%	13.5%	1	0	6	1.5%	13.5%	1	0
7	0.6%	6.1%	0	0	7	0.6%	6.1%	0	0
8	1.4%	4.1%	0	0	8	1.4%	4.1%	0	0
9	1.6%	6.3%	0	0	9	1.6%	6.3%	0	0
10	3.7%	13.7%	1	0	10	3.7%	13.7%	1	0
11	1.8%	6.0%	0	0	11	1.8%	6.0%	0	0
12	9.7%	15.9%	1	0	12	9.7%	15.9%	1	0
13	19.2%	30.0%	1	0	13	19.2%	30.0%	1	0
14	6.8%	12.7%	2	0	14	6.8%	12.7%	2	0
15	14.2%	23.9%	2	0	15	14.2%	23.9%	2	0
16	11.7%	20.3%	3	0	16	11.7%	20.3%	3	0
17	23.0%	29.9%	2	0	17	23.0%	29.9%	2	0
18	8.0%	10.4%	2	0	18	8.0%	10.4%	2	0
19	24.1%	30.9%	3	0	19	24.1%	30.9%	3	0
20	9.3%	18.5%	1	0	20	6.8%	15.6%	1	0
21	5.1%	12.5%	1	0	21	5.1%	12.6%	1	0
22	15.1%	26.7%	3	0	22	23.9%	36.9%	3	5
23	6.5%	20.7%	1	0	23	6.5%	20.7%	1	0
24	7.0%	17.3%	1	0	24	6.4%	15.0%	1	0
25	5.9%	11.0%	0	0	25	6.2%	10.8%	0	0
26	4.0%	14.8%	0	0	26	4.7%	14.3%	0	0
27	3.7%	13.3%	1	0	27	3.7%	13.3%	1	0
28	3.9%	15.3%	0	0	28	3.9%	15.3%	0	0
29	13.6%	53.3%	2	0	29	13.6%	53.3%	2	0
30	8.1%	24.2%	0	0	30	6.6%	22.7%	0	0
31	7.6%	26.5%	1	0	31	7.6%	26.5%	1	0
32	8.0%	12.9%	2	0	32	8.0%	12.9%	2	0
33	11.2%	14.3%	3	0	33	18.3%	21.8%	3	0
34	15.7%	23.5%	3	0	34	11.5%	17.0%	3	0
35	28.4%	39.6%	3	8	35	24.2%	35.0%	3	5
36	17.0%	23.5%	3	0	36	11.4%	23.8%	1	0
37	28.2%	46.8%	3	8	37	32.6%	56.9%	3	8
38	54.2%	66.8%	4	8	38	44.0%	54.5%	4	8
39	55.3%	74.0%	4	8	39	46.1%	61.6%	3	8
40	33.0%	38.9%	3	8	40	42.0%	52.2%	3	8
41	39.4%	68.0%	4	8	41	41.0%	53.4%	3	8
42	33.7%	51.1%	3	8	42	32.9%	55.4%	3	8
43	26.5%	40.6%	3	8	43	33.1%	52.9%	3	8
44	12.0%	22.5%	2	0	44	17.8%	25.7%	3	5
45	5.3%	10.2%	0	0	45	5.7%	10.8%	0	0
46	8.1%	15.5%	0	0	46	8.0%	14.3%	0	0
47	10.7%	18.1%	2	0	47	13.5%	23.5%	3	5
48	11.8%	24.2%	0	1	48	12.2%	19.3%	0	1
49	8.4%	15.1%	0	0	49	6.4%	11.6%	0	0
50	12.4%	18.8%	2	8	50	11.7%	18.9%	2	7
51	23.7%	37.0%	0	8	51	23.3%	41.5%	3	8
52	16.0%	23.4%	0	8	52	14.2%	21.2%	0	7
53	14.5%	21.9%	0	1	53	16.3%	28.4%	0	6
54	15.5%	28.3%	0	7	54	13.5%	21.1%	0	4
55	55.4%	60.4%	3	8	55	94.2%	96.6%	4	8
56	45.5%	51.3%	3	8	56	45.4%	51.1%	2	8
57	18.1%	26.1%	0	8	57	18.6%	26.8%	0	8
58	63.0%	68.1%	3	8	58	47.0%	53.5%	3	8
59	70.1%	74.5%	3	8	59	60.8%	65.5%	3	8
60	63.9%	69.0%	3	8	60	50.1%	56.6%	3	8



HD Enacted					HD Alt Eff 2 Part 2				
HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8	HD	BVAP	BHVAP	Primaries out of 4	Generals out of 8
61	74.3%	81.9%	4	8	61	47.4%	57.5%	4	8
62	72.3%	79.1%	3	8	62	80.7%	88.5%	4	8
63	69.3%	78.6%	3	8	63	63.5%	72.0%	3	8
64	30.7%	38.1%	3	0	64	50.5%	57.3%	4	8
65	62.0%	66.5%	4	8	65	67.6%	71.7%	4	8
66	53.4%	62.9%	4	8	66	51.2%	60.3%	4	8
67	58.9%	66.7%	4	8	67	90.4%	95.7%	4	8
68	55.7%	62.0%	4	8	68	58.2%	65.0%	4	8
69	63.6%	69.0%	4	8	69	54.6%	60.9%	4	8
70	27.8%	35.8%	3	0	70	27.8%	35.8%	3	0
71	19.9%	26.1%	3	0	71	19.9%	26.1%	3	0
72	20.9%	27.8%	1	0	72	20.9%	27.8%	1	0
73	12.1%	19.1%	2	0	73	11.9%	18.9%	2	0
74	25.5%	31.1%	3	0	74	12.8%	18.5%	2	0
75	74.4%	85.7%	4	8	75	61.4%	73.4%	3	8
76	67.2%	80.4%	4	8	76	70.4%	83.6%	4	8
77	76.1%	88.3%	4	8	77	77.0%	89.6%	4	8
78	71.6%	80.5%	4	8	78	68.6%	77.0%	4	8
79	71.6%	87.6%	4	8	79	73.1%	88.6%	4	8
80	14.2%	37.3%	0	8	80	25.4%	59.8%	0	8
81	21.8%	42.7%	0	8	81	17.9%	51.9%	0	8
82	16.8%	23.6%	0	8	82	13.0%	18.8%	0	8
83	15.1%	43.6%	0	8	83	16.0%	26.0%	0	8
84	73.7%	76.7%	3	8	84	76.1%	79.2%	3	8
85	62.7%	68.6%	3	8	85	66.7%	72.3%	3	8
86	75.1%	79.4%	3	8	86	59.9%	65.5%	3	8
87	73.1%	79.8%	4	8	87	90.3%	94.1%	4	8
88	63.3%	73.3%	3	8	88	52.0%	60.6%	3	8
89	62.5%	65.9%	2	8	89	65.3%	68.5%	3	8
90	58.5%	62.8%	2	8	90	58.5%	62.8%	2	8
91	70.0%	75.9%	4	8	91	53.0%	58.2%	4	8
92	68.8%	73.5%	4	8	92	69.6%	76.5%	4	8
93	65.4%	75.0%	4	8	93	85.5%	92.7%	4	8
94	69.0%	76.3%	4	8	94	81.3%	85.9%	4	8
95	67.2%	75.1%	4	8	95	49.1%	59.2%	4	8
96	23.0%	59.0%	3	8	96	23.2%	55.1%	3	8
97	26.8%	46.0%	3	8	97	25.6%	54.7%	3	8
98	23.2%	76.0%	3	8	98	23.4%	70.1%	3	8
99	14.7%	23.4%	3	3	99	16.8%	26.9%	3	5
100	10.0%	20.0%	1	0	100	14.1%	28.6%	3	0
101	24.2%	42.4%	3	7	101	33.8%	56.0%	3	8
102	37.6%	58.9%	3	8	102	39.5%	54.2%	4	7
103	16.8%	33.7%	3	0	103	12.2%	25.0%	3	0
104	17.0%	28.1%	3	0	104	19.7%	30.9%	3	0
105	29.0%	45.8%	3	6	105	26.1%	43.2%	3	6
106	36.3%	47.4%	3	7	106	41.3%	52.9%	3	8
107	29.6%	60.7%	3	8	107	30.0%	55.6%	3	8
108	18.4%	36.6%	3	6	108	26.0%	57.5%	3	8
109	32.5%	68.6%	3	8	109	26.0%	56.2%	3	8
110	47.2%	57.7%	4	8	110	42.4%	53.0%	4	7
111	22.3%	31.1%	3	0	111	14.5%	23.3%	3	0
112	19.2%	22.5%	1	0	112	19.2%	22.5%	1	0
113	59.5%	66.2%	4	8	113	53.9%	59.5%	4	8
114	24.7%	28.4%	3	0	114	24.9%	28.7%	3	0
115	52.1%	59.1%	4	8	115	50.3%	57.2%	4	7
116	58.1%	65.4%	4	8	116	53.2%	61.1%	4	8
117	36.6%	42.0%	3	0	117	50.1%	56.6%	4	7
118	23.6%	27.3%	3	0	118	27.0%	31.1%	3	0
119	13.5%	23.9%	2	0	119	13.5%	23.9%	2	0
120	14.3%	21.4%	2	0	120	14.3%	21.4%	2	0

HD	HD Enacted				HD	HD Alt Eff 2 Part 3			
	BVAP	BHVAP	Primaries out of 4	Generals out of 8		BVAP	BHVAP	Primaries out of 4	Generals out of 8
121	9.6%	15.2%	0	0	121	9.6%	15.2%	0	0
122	28.4%	40.1%	3	8	122	28.4%	40.1%	3	8
123	24.3%	28.6%	3	0	123	13.7%	19.7%	3	0
124	25.6%	31.8%	2	0	124	25.5%	29.3%	2	0
125	23.7%	31.4%	3	0	125	30.2%	36.3%	3	0
126	54.5%	57.7%	4	8	126	50.7%	54.9%	4	8
127	18.5%	23.3%	3	0	127	17.6%	23.8%	3	0
128	50.4%	52.1%	2	4	128	50.2%	51.7%	2	6
129	54.9%	59.2%	3	8	129	50.4%	54.0%	3	8
130	59.9%	63.8%	4	8	130	57.1%	61.8%	4	8
131	17.6%	23.5%	3	0	131	17.6%	23.3%	3	0
132	52.3%	60.1%	4	8	132	54.4%	61.5%	4	8
133	36.8%	38.9%	3	0	133	46.6%	48.7%	3	8
134	33.6%	37.3%	1	0	134	33.6%	37.3%	1	0
135	23.8%	25.6%	1	0	135	23.8%	25.6%	1	0
136	28.7%	32.3%	3	0	136	28.7%	32.3%	3	0
137	52.1%	56.6%	4	8	137	48.0%	51.9%	4	8
138	19.3%	22.6%	2	0	138	19.3%	22.6%	2	0
139	20.3%	26.7%	2	0	139	20.3%	26.7%	2	0
140	57.6%	65.6%	4	8	140	65.1%	71.6%	4	8
141	57.5%	64.1%	4	8	141	49.3%	56.2%	4	8
142	59.5%	63.2%	3	8	142	50.1%	53.9%	3	8
143	60.8%	65.5%	3	8	143	52.9%	59.2%	3	8
144	29.3%	31.9%	3	0	144	51.0%	55.2%	3	8
145	35.7%	41.6%	3	0	145	23.1%	25.9%	3	0
146	27.6%	32.3%	4	0	146	24.4%	29.8%	4	0
147	30.1%	37.3%	4	0	147	30.9%	37.7%	4	0
148	34.0%	37.1%	4	0	148	40.8%	44.2%	4	0
149	32.1%	37.8%	2	0	149	32.1%	37.8%	2	0
150	53.6%	59.7%	4	8	150	52.1%	57.2%	4	7
151	42.4%	49.7%	4	0	151	45.1%	53.1%	4	7
152	26.1%	28.4%	4	0	152	33.1%	36.4%	4	0
153	67.9%	70.4%	4	8	153	61.4%	64.2%	4	8
154	54.8%	56.5%	4	7	154	62.0%	64.4%	4	8
155	35.9%	38.1%	3	0	155	35.9%	38.1%	3	0
156	30.3%	37.2%	4	0	156	30.3%	37.2%	4	0
157	24.7%	33.7%	3	0	157	24.7%	33.7%	3	0
158	31.2%	35.7%	2	0	158	31.2%	35.7%	2	0
159	24.5%	27.4%	2	0	159	22.0%	25.6%	3	0
160	22.6%	27.6%	2	0	160	26.3%	31.4%	1	0
161	27.1%	33.9%	4	0	161	41.6%	51.6%	4	8
162	43.7%	53.3%	4	8	162	43.0%	51.5%	4	8
163	45.5%	52.9%	3	8	163	42.7%	50.4%	4	8
164	23.5%	32.0%	3	0	164	13.4%	18.9%	3	0
165	50.3%	55.6%	4	8	165	45.5%	50.5%	4	8
166	5.7%	9.8%	3	0	166	7.2%	11.3%	3	0
167	22.3%	29.7%	3	0	167	36.5%	43.9%	4	4
168	46.3%	56.6%	4	8	168	40.9%	51.7%	4	7
169	29.0%	36.7%	3	0	169	28.7%	35.7%	3	0
170	24.2%	32.9%	3	0	170	28.1%	35.4%	3	0
171	39.6%	44.2%	4	0	171	33.4%	40.3%	3	0
172	23.3%	36.7%	4	0	172	27.4%	39.2%	4	0
173	36.3%	41.7%	4	0	173	29.5%	34.7%	4	0
174	17.4%	25.4%	3	0	174	17.4%	25.4%	3	0
175	24.2%	29.2%	4	0	175	18.0%	22.7%	4	0
176	22.7%	30.9%	4	0	176	23.0%	32.4%	4	0
177	53.9%	60.0%	4	7	177	53.9%	60.0%	4	7
178	14.8%	19.9%	3	0	178	14.8%	19.9%	3	0
179	27.0%	33.4%	3	0	179	18.7%	24.7%	3	0
180	18.2%	23.8%	3	0	180	18.6%	24.3%	3	0

Table 54: Demographics and effectiveness for HD Alt Eff 2, shown side-by-side with HD Enacted for convenience.

Executed this 26th day of April 2023 in Chicago, Illinois.

A handwritten signature in black ink, appearing to read 'Moon Duchin', written over a horizontal line.

Dr. Moon Duchin

# EXHIBIT 38

Georgia State Conference of The NAACP, et al. v. S

Page 1

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

GEORGIA STATE CONFERENCE OF )  
THE NAACP, et al. )

Plaintiffs, )

vs. ) Case No. 1:21-CV-5338

) ELB-SCG-SDG

STATE OF GEORGIA, et al, )

Defendants. )

\_\_\_\_\_ )

STATE OF GEORGIA, et al., )

Plaintiffs, ) Case No. 1:22-CV-00090

vs. ) ELB-SCJ-SDG

BRAD RAFFENSPERGER, )

Defendant. )

\_\_\_\_\_ )

Deposition of Moon Duchin, PhD

(Signature is reserved.)

February 27, 2023

1:07 p.m.

Remote via Zoom technology

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

1 an opinion about the particular motivation behind a  
2 plan? Is that correct?

3 A I think at a high level the narrative  
4 that I am offering in terms of my conclusions is  
5 that what I observe in the plans is consistent with  
6 a pursuit of partisan ends but one in which race was  
7 clearly used to achieve those ends.

8 Q And so your opinion is that the  
9 legislature pursued partisan ends but then used race  
10 in part to achieve those partisan ends?

11 A I try to be careful to be clear that I'm  
12 not reading minds. And so if you will allow me,  
13 I'll continue to use constructions like "I find  
14 evidence consistent with the following behavior," so  
15 that I'm not pretending to know more than I'm able  
16 to discern from the data that's available to me.

17 Q And you anticipated my next question  
18 which was, are you offering any opinions about the  
19 reasoning of Georgia legislators in the creation of  
20 the Congressional, State House and State Senate  
21 plans?

22 A Right. I would -- I would say that  
23 generally I think the kinds of findings that I  
24 describe here are evidence that might be persuasive  
25 in terms of discerning intent, but I certainly can

1 make no hard and fast conclusions about what was in  
2 the hearts and minds of the legislators or the -- or  
3 the staff.

4 Q And so then it would be fair to say that  
5 you're not offering the opinion that the  
6 Congressional House and Senate maps in Georgia were  
7 drawn with racially discriminatory intent, right?

8 A I would say that I'm offering evidence  
9 that the court can use to make a determination of  
10 intent but that it would -- one should be careful  
11 not to overstate how conclusively this kind of  
12 evidence can operate.

13 Q And my question I think was -- I  
14 understand that's where you're coming from. My  
15 question was a little more specific, which is:  
16 You're not offering the opinion that Georgia's House  
17 Senate and Congressional plans were drawn with  
18 racially discriminatory intent, right?

19 MR. CANTER: Objection. Asked and  
20 answered.

21 A Right. I would say -- you know, trying  
22 to be fully cooperative with the question, I think  
23 that that's what I've already answered in saying I  
24 think I find evidence that can help the court reach  
25 conclusions about intent, and that's how -- how far

1 Q You discuss next the differences in  
2 census data, the population -- redistricting data  
3 release versus the ACS or American Community Survey  
4 data. And I just wanted to make sure I understood a  
5 couple of pieces that the B -- the CVAP, so citizen  
6 voting age population, number is only available from  
7 ACS data and not from the redistricting data  
8 release, right?

9 A Correct. Furthermore, it requires  
10 inference to take the C -- the citizen data from the  
11 ACS and put it onto the units needed to do this kind  
12 of analysis.

13 Q And that was my next question. In terms  
14 of your estimated CVAP you built from block-level  
15 adjusted VAP. Can you just talk briefly about what  
16 block-level adjusted VAP is.

17 A Yes, and also there's really quite an  
18 extensive discussion of precisely how this is done  
19 in the appendix.

20 So how -- would you like just an  
21 explanation -- should I read from this?

22 Q Just -- if you could just give a general  
23 overview. I understand that there's a lot of  
24 writing about it. If you could just kind of  
25 generally describe the process of what that means.



1           A       Absolutely. Absolutely. So the process  
2       is to use regionally specific ACS estimates to poll  
3       the citizenship ratio for four different groups:  
4       Black, Hispanic, white and other. And so I used  
5       tract level data. Tracts are census units typically  
6       with about 8,000 people.

7                       So I used tract-level data to get those  
8       local ratios of citizenship, and then I apply that  
9       to the voting age population of the block level.

10          Q       At the very bottom of Page 7 you talk  
11       about how in Section 8, "I will confirm that my  
12       alternative plans satisfy the Gingles 1 standard for  
13       coalition districts using black and Hispanic CVAP as  
14       well as using VAP."

15                     What is the Gingles 1 standard for  
16       coalition districts as you understand it.

17          A       Well, here I'm referring to the  
18       threshold that was in my understanding confirmed in  
19       Bartlett vs. Strickland. That's the 50 percent plus  
20       one threshold. That's what I mean.

21          Q       And it's your understanding that that 50  
22       percent plus one standard for coalition district  
23       came from Bartlett?

24          A       Was clarified in Bartlett.

25          Q       And did you use that understanding as

1 you drew your alternative plans in constructing  
2 those districts?

3 A Oh, definitely. They're -- they're  
4 designed to meet a 50 percent plus one threshold.

5 Q And next -- I know we already referenced  
6 these tables, but on Page 8 you go into the  
7 demographic trends, the different places, and we  
8 talked about various numbers. But just in looking  
9 at the change in the black CVAP population in Table  
10 2 from 2010 to 2019, that's a movement of almost  
11 exactly two points from 2010 to 2019; right?

12 A 2 percentage points, right.

13 Q And then Figure 2 has your racial dot  
14 density plot.

15 A Yes.

16 Q Please describe the difference in a  
17 Choropleth versus a racial dot density plot?

18 A Absolutely. And I think they can both  
19 be informative. If you use just one, sometimes  
20 you're not getting the whole picture. So as I said  
21 before, a Choropleth colors the units. But that's  
22 subject to what geographers called MAUP, M-A-U-P,  
23 which stands for the modifiable aerial unit problem,  
24 which suggests that you can radically change the  
25 impressions of the picture just by shifting the

1 drawing maps that are ultimately enacted involves  
2 participation from many people. But I had a role  
3 in, for instance, the drawing of the Massachusetts  
4 state Senate districts in this cycle.

5 Q And in that role do you advise  
6 legislators or others who are drawing or working  
7 with you on those plans that maximizing electoral  
8 opportunity for minority-preferred candidates is a  
9 goal they should ascribe to?

10 A I've certainly never advised that as a  
11 goal.

12 Q And so ultimately in this report, I  
13 guess since we're getting into the section, it's  
14 criticizing Georgia for not drawing enough majority  
15 minority districts on its Congressional House and  
16 Senate plans. Is that fair?

17 A Oh, I wouldn't say so. Rather than  
18 criticizing Georgia for not doing enough, what I'm  
19 trying to do here is create a framework for  
20 measurement. And then, as I say in the section  
21 we've already reviewed, providing maps that  
22 demonstrate that it's possible to get more  
23 opportunity while still being very respectful to  
24 DP's.

25 But I don't think it amounts to

1 criticism per se. That's -- again, my goal is to --  
2 here to give a framework and offer alternatives not  
3 to criticize per se.

4 Q Let me move into probative elections and  
5 the process for identifying those.

6 A Yes.

7 Q And you start by saying that it's well  
8 understood in voting rights -- in the voting rights  
9 sphere it's well understood that certain past  
10 elections are more probative.

11 Are you relying on literature for that  
12 or other discussion? What are you referring to as  
13 the voting rights sphere?

14 A Well, certainly in the first instance  
15 the scholarly peer-reviewed literature to which I've  
16 contributed in this area.

17 And so I have publications where I've  
18 discussed the selection of the probative elections  
19 and the kind of weight that you might put on  
20 different contests in a context like this one.

21 Q And you reference several factors that  
22 probative contests often include the following, and  
23 one of them is that when they have a viable POC  
24 candidate on the ballot; is that right?

25 A Correct.

1           A           Well, I don't think that sentence refers  
2           to partisanship at all. It just says if you were to  
3           undertake -- let's hypothesize a race neutral and  
4           party neutral mapping process. Then you might  
5           expect more opportunity.

6                       This might be a good time to note even  
7           though we're discussing my initial report, that  
8           that's a theme that I come back to in the rebuttal  
9           report where the state's expert, John Morgan, drew  
10          what he described as a neutral plan. And even his  
11          neutral plan has more effective districts than the  
12          state's.

13                      So I would call that conspicuous  
14          limitation of the number.

15                      Now, as you have kind of indicated with  
16          the question, that can be in the service of partisan  
17          goals but the effect is to reduce the number of  
18          opportunity districts below what a blind process  
19          might have found.

20           Q           And the usage of the term the state has  
21          not just avoided, has conspicuously limited sounds  
22          like kind of intent language to me. You're not  
23          saying that this was an intentional decision by the  
24          map drawers to engage in this kind of process of  
25          limiting opportunities to elect districts, right?

1           A       Well, you know, as we discussed earlier,  
2       that's probably a conclusion for the courts. But I  
3       do find this to be suggestive of intent.

4           Q       When you say suggestive of intent, it  
5       means that -- well, what do you mean by suggestive  
6       of intent?

7           A       Well, I mean that as always I try to  
8       carefully describe my role as one of providing  
9       evidence to make a conclusion from. And I think  
10      this evidence supports a finding of intent.

11          Q       But you're not saying that it was  
12      intentional conduct. You're just saying it  
13      supports -- the data support a finding of intent?

14          A       This is just my attempt to -- add a kind  
15      of necessarily humility about the -- what my role is  
16      in a case like this. So I provide evidence. I can  
17      suggest that I find the evidence suggestive. But  
18      ultimately that's a conclusion for the court to  
19      draw.

20          Q       Let's look next to the section 9.1 which  
21      talks about Congress. And you say that it's  
22      extremely to improve on the limited number of  
23      effective districts, and to do this involves  
24      relieving the packing and cracking from the enacted  
25      plan.

1 partisan considerations can be in play. My question  
2 was just was raced used to achieve them or is there  
3 evidence that racial considerations were also in  
4 play.

5 Q And so -- but specifically in this  
6 section of your report, you're not analyzing any  
7 political data in comparison to racial data for  
8 these various geographic changes; right?

9 A I think in this section itself you won't  
10 see that. But the section is supported by several  
11 appendix tables. And, for example -- let me just  
12 flip ahead and find them.

13 So Section C supports the split of  
14 subsection of 10, and there you will see political  
15 data compared to demographic data.

16 Q So in terms of finding a complete  
17 analysis in Section 10, you have to include all of  
18 Appendix C to see the complete analysis of that. is  
19 that fair to say?

20 A I guess the way I would phrase it is  
21 that I think Section -- Appendix C can be helpful.  
22 But I've tried in section -- in the body of Section  
23 10 to present what I think is a collection of useful  
24 facts and observations.

25 Q Let's start with District 6. And you

1 in the creation of District 56, 48, and 17 -- and 7?  
2 I'm sorry.

3 A You mean predominated over TDPs?

4 Q Yes.

5 A Am I offering that opinion? I don't  
6 think there's a place where I say something like  
7 that quite that way. But I do think I'm presenting  
8 evidence that shows that decisions with a marked  
9 racial character were made in ways that made  
10 traditional principles worse.

11 And so, yes, I think it's reasonable to  
12 conclude that race predominates -- that  
13 race-inflected decision making predominated over  
14 TDPs, yes.

15 Q And are you reaching that conclusion for  
16 the Congressional Districts 14 and 6 as well?

17 A That racially-distinctive decisions  
18 predominated over TDPs? Sure. I'm comfortable  
19 saying that.

20 Q Even though you're making that statement  
21 about Congressional District 6 and 14 and Senate 56,  
22 48, 17, you still can't rule out a political goal  
23 that just had a racial impact; right?

24 A But it's not just a political goal, the  
25 racial impact. It's, as I've said a number of



1 right?

2 A Under which hypothesis? Sorry. Let me  
3 try and answer that in the spirit I think you're  
4 asking. If race was used to achieve partisan goals,  
5 then we'd expect to see racially-distinctive  
6 transfers and corresponding politically distinctive  
7 transfers.

8 Now, we might see differences in racial  
9 demographics that are greater than or about equal  
10 to. I'm not saying anything in particular about the  
11 relative magnitude. But I am saying that to arrive  
12 at a conclusion like the one that I'm describing,  
13 that race was used to achieve partisan goals, then  
14 you'd expect in many places to see gaps in both.

15 Q And I guess what I'm trying to  
16 understand is -- I understand the perspective of  
17 race being used to achieve a partisan goal and you'd  
18 see a partisan differential basically and a racial  
19 differential.

20 If partisanship was being used to  
21 achieve a partisan goal, wouldn't you also expect to  
22 see both a partisan differential and a racial  
23 differential in Georgia?

24 A Well, I think that's -- that's a  
25 fundamental question. I address that more head on

1 in the rebuttal report, which I'm sure we'll come  
2 to.

3 So in this -- you know, in the content  
4 of the current report, you're correct that I haven't  
5 directly addressed the question of whether partisan  
6 differential can be achieved without concomitant  
7 racial differential. But I do think I get to that  
8 in the rebuttal report.

9 Q Okay. And for purposes of this, report,  
10 you'd agree that that type of analysis is not here,  
11 it's in your rebuttal report; right?

12 A Let me just give a moment's thought of  
13 -- to whether there's anything in this initial  
14 report that really speaks directly to that. I mean,  
15 I guess the only thing I would say --

16 And this is worth saying is that the  
17 split count or all does speak to that. So -- so let  
18 me -- let me address that for a moment.

19 So there's county splits, and we've  
20 talked about those on several occasions. We've  
21 talked in passing about precinct splits.

22 But I think to your point that you were  
23 just asking about, precinct splits are especially  
24 important because precincts are the level at which  
25 votes are reported. And so if you're splitting

1 precincts you cannot claim to be doing do, I think  
2 -- as far as I'm aware, you cannot claim to be  
3 confidently doing so on the basis of election  
4 history.

5 Of course you can use the predictive  
6 analytics to try to guess who voted how. But in my  
7 understanding the primary tool that you have at your  
8 disposal when you split precincts is demographics.  
9 That's what's available to you when you split  
10 precincts.

11 And so I find that the state has split  
12 far, far more precincts than my alternative maps  
13 have. And again, we're talking about state  
14 precincts here, not the census VTDs.

15 And to me that is -- that is suggestive  
16 of race, not party, as a kind of explanation.

17 Q So beyond the precinct splits we just  
18 talked about and for purposes of this report, you  
19 don't have further analysis to discuss splits of a  
20 partisan nature having a racial impact that may be  
21 unintended, right?

22 A That's right. The strongest evidence is  
23 that of split precincts.

24 Q Well, let's move into the state House.  
25 I wanted to ask you about -- I think this gets into

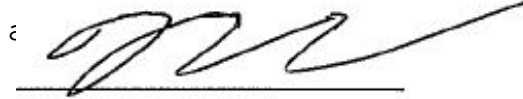
DISCLOSURE

STATE OF GEORGIA DEPONENT: MOON DUCHIN, PhD  
COUNTY OF FULTON

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure.

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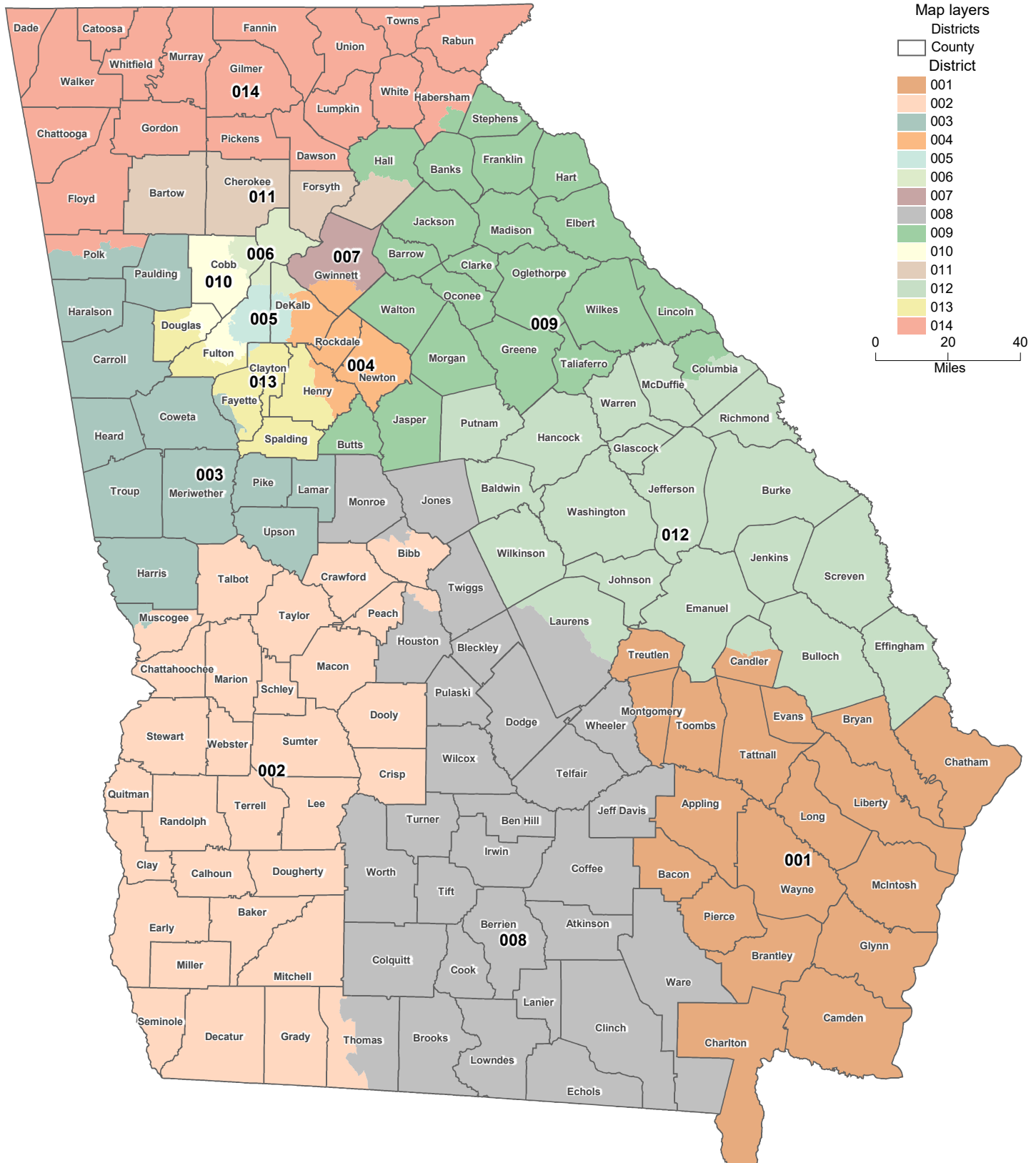
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March 22, 2023.

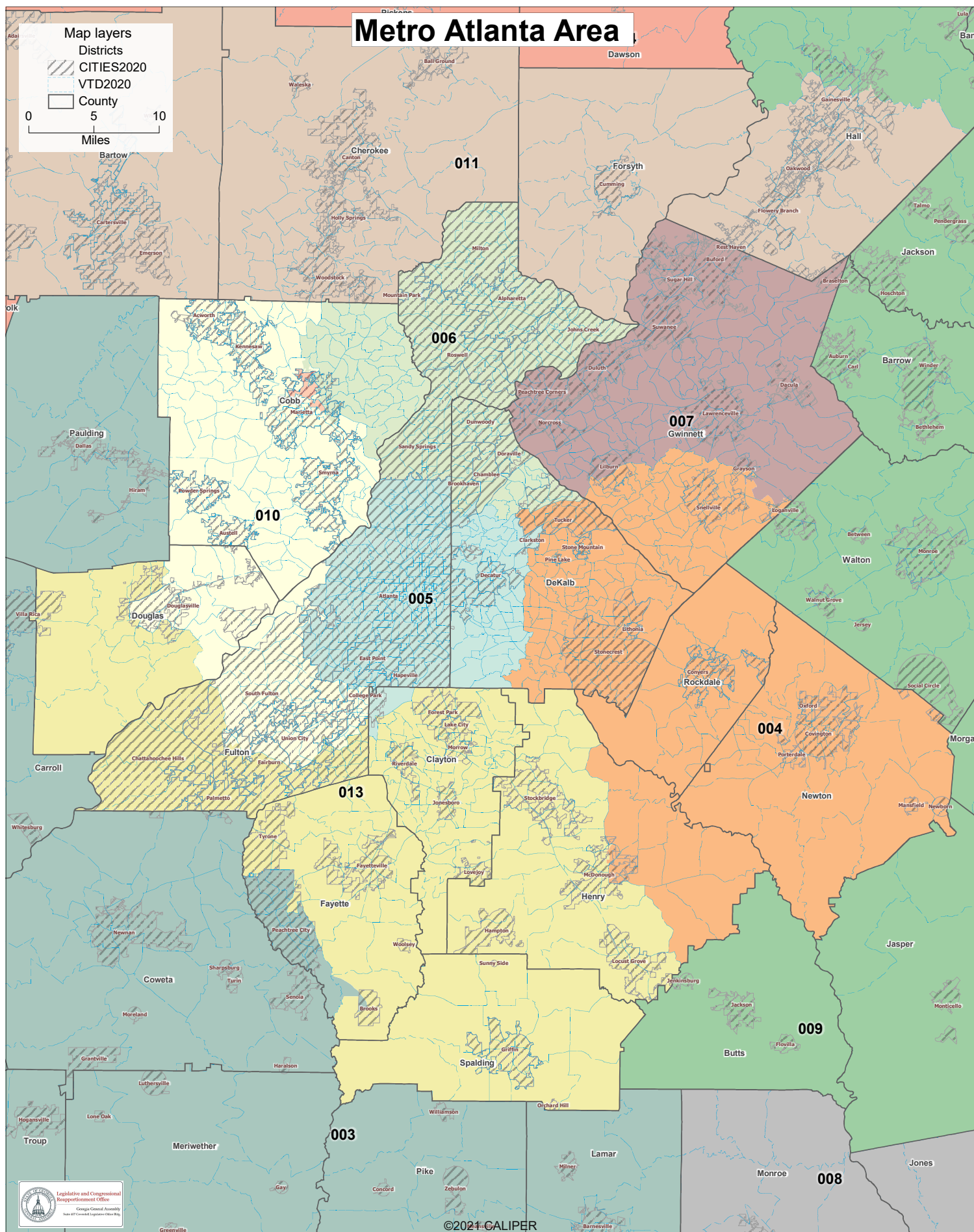
# EXHIBIT 39

# Proposed Georgia Congressional Districts





## Metro Atlanta Area



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:23 AM

**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%	590,786	77.21%	56.59%	28.29%	8.28%	2.13%	0.23%	0.15%	0.42%	3.9%
002	765,135	-1	0.00%	587,666	76.81%	39.33%	49.92%	5.84%	1.24%	0.2%	0.09%	0.34%	3.05%
003	765,137	1	0.00%	581,128	75.95%	67.53%	19.58%	6.22%	1.92%	0.22%	0.05%	0.46%	4.02%
004	765,136	0	0.00%	579,213	75.7%	24.78%	58.52%	7.8%	4.46%	0.18%	0.04%	0.67%	3.56%
005	765,137	1	0.00%	623,102	81.44%	36.44%	47.63%	6.69%	4.87%	0.16%	0.03%	0.54%	3.64%
006	765,137	1	0.00%	588,726	76.94%	56.04%	12.14%	14%	12.77%	0.13%	0.04%	0.77%	4.12%
007	765,135	-1	0.00%	567,115	74.12%	32.17%	23.82%	25.63%	14.13%	0.15%	0.04%	0.65%	3.41%
008	765,136	0	0.00%	583,936	76.32%	59.13%	28.34%	7.34%	1.51%	0.2%	0.05%	0.31%	3.13%
009	765,137	1	0.00%	594,668	77.72%	70.26%	15.06%	8.18%	2.22%	0.19%	0.03%	0.47%	3.6%
010	765,137	1	0.00%	590,424	77.17%	35.53%	41.44%	14.45%	3.49%	0.18%	0.05%	0.86%	4%
011	765,137	1	0.00%	570,405	74.55%	66.31%	6.64%	15.25%	7.22%	0.19%	0.04%	0.49%	3.86%
012	765,136	0	0.00%	589,460	77.04%	52.15%	36.34%	5.1%	1.93%	0.22%	0.11%	0.38%	3.77%
013	765,135	-1	0.00%	575,033	75.15%	25.7%	56.41%	10.3%	3.38%	0.19%	0.04%	0.66%	3.31%
014	765,136	0	0.00%	598,612	78.24%	78.85%	4.31%	11.74%	0.91%	0.24%	0.03%	0.28%	3.64%

**Total: 10,711,908****Ideal District: 765,136**



User: HD143

Plan Name: GHDC-GSDC-Cong Plan1

Plan Type: Congress

**Population Summary**

Thursday, October 21, 2021

11:25 AM

**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%	590,786	77.21%	59.51%	27.16%	7.2%	2.3%	0.24%	0.14%	0.36%	3.1%
002	765,135	-1	0.00%	587,666	76.81%	42.21%	48.38%	5.03%	1.31%	0.22%	0.09%	0.27%	2.49%
003	765,137	1	0.00%	581,128	75.95%	69.81%	19.11%	5.3%	1.92%	0.22%	0.06%	0.37%	3.22%
004	765,136	0	0.00%	579,213	75.7%	27.14%	57.92%	6.72%	4.33%	0.18%	0.04%	0.6%	3.07%
005	765,137	1	0.00%	623,102	81.44%	38.63%	46.2%	6.14%	5.17%	0.16%	0.04%	0.49%	3.17%
006	765,137	1	0.00%	588,726	76.94%	58.57%	12.48%	12.32%	12.44%	0.12%	0.04%	0.69%	3.35%
007	765,135	-1	0.00%	567,115	74.12%	34.96%	23.37%	23.1%	15.07%	0.15%	0.04%	0.54%	2.76%
008	765,136	0	0.00%	583,936	76.32%	61.62%	27.63%	6.23%	1.56%	0.21%	0.05%	0.24%	2.46%
009	765,137	1	0.00%	594,668	77.72%	72.75%	14.61%	6.83%	2.25%	0.2%	0.03%	0.4%	2.93%
010	765,137	1	0.00%	590,424	77.17%	38.71%	40.7%	12.5%	3.66%	0.19%	0.05%	0.8%	3.4%
011	765,137	1	0.00%	570,405	74.55%	70.01%	6.6%	13.09%	6.49%	0.18%	0.04%	0.42%	3.16%
012	765,136	0	0.00%	589,460	77.04%	54.64%	35.25%	4.45%	2.04%	0.23%	0.1%	0.32%	2.97%
013	765,135	-1	0.00%	575,033	75.15%	28.57%	55.4%	8.86%	3.57%	0.2%	0.04%	0.59%	2.76%
014	765,136	0	0.00%	598,612	78.24%	81.74%	4.22%	9.46%	0.92%	0.25%	0.03%	0.23%	3.14%

**Total: 10,711,908****Ideal District: 765,136**

# EXHIBIT 40

## (Filed Under Seal)