UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

DAVID B. MEANS, ET AL.,

Plaintiffs,

v.

DESOTO PARISH ET AL.

Defendants.

CIVIL ACTION NO. 5:23-CV-00669

JUDGE JERRY EDWARDS, JR.

MAGISTRATE JUDGE HORNSBY

JOINT REPORT ON SPECIAL MASTER CANDIDATES

Pursuant to the Court's July 9, 2026 Scheduling Order, Plaintiffs, David B. Means, Ryan Dupree, Robert G. Burford, Robert Gross, Mary L. Salley, Martha Trisler, John F. Pearce, Joe Cobb, Jack L. Burford, Jack E. Barron, W. Bruce Garlington, Donald Barber, Billy Dwayne Brumley, and Sherry Brumley, and Defendants, DeSoto Parish and DeSoto Parish Police Jury (collectively "Parties"), through undersigned counsel, respectfully submit the following candidates for the Court's appointment of Special Master:

1. **Thomas M. Bryan.** Mr. Bryan provided an estimated cost of $46,000. This includes approximately 80 hours at $500/hour for his time, 16 hours at $250/hour for the director of analytics at his firm, and 16 hours at $175/hour for the GIS manager at his firm. Thomas M. Bryan's resume is attached as **Exhibit A**.
2. **Douglas Johnson.** Mr. Johnson provided an estimated cost of $27,400. This includes a flat fee of $5,000 to create the dataset and approximately 56 hours at $400/hour for his time. Douglas Johnson's resume is attached as **Exhibit B**.
3. **Dannie P. Garrett, III.** Mr. Garrett requested a flat fee of $27,500. Mr. Garrett's resume is attached as **Exhibit C**.

DATED this 17th day of July 2026.

For the Plaintiffs:

/s/ Jason B. Torchinsky
Jason B. Torchinsky* (VA Bar # 47481)
HOLTZMAN VOGEL BARAN TORCHINSKY
& JOSEFIAK, PLLC
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/s/ Reid A. Jones
Reid A. Jones (#34611)
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*Admitted Pro Hac Vice

For the Defendants:

/s/ Carroll Devillier, Jr.
Timothy W. Hardy (LA Bar # 6550)
Claude F. Reynaud, Jr. (LA Bar # 11197)
Jeanne C. Comeaux (LA Bar # 22999)
Carroll Devillier, Jr. (LA Bar # 30477)
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Peter J. Butler (LA Bar # 18522)
Thomas M. Benjamin (LA Bar # 18562)
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CERTIFICATION OF SERVICE

I hereby certify that on this day I electronically served the foregoing document upon all counsel of record.

DATED this 17th day of July 2026.

Respectfully submitted,

/s/ Reid A. Jones

Exhibit A

Thomas M. Bryan

15161 Deep Spring Drive
Montpelier, VA 23192
425-466-9749
tom@bryangeodemo.com

Redistricting Résumé and C.V.

Introduction

I am an applied demographic, analytic, and research professional who leads a team of experts in state and local redistricting cases. I have subject matter expertise in political and school redistricting and Voting Rights Act-related litigation, US Census Bureau data, geographic information systems (GIS), applied demographic techniques, and advanced analytics.

Education & Academic Honors

2002 MS, Management and Information Systems - George Washington University

2002 GSA CIO University graduate - George Washington University

1997 Graduate credit courses taken at the University of Nevada, Las Vegas

1996 MUS (Master of Urban Studies) Demography and Statistics core - Portland State University

1992 BS, History - Portland State University

Online

BGD company website: https://www.bryangeodemo.com/

ResearchGate: https://www.researchgate.net/profile/Thomas-Bryan-6

LinkedIn: https://www.linkedin.com/in/thomas-bryan-424a6912

Bryan GeoDemographics, January 2001-Current: Founder and President

I founded Bryan GeoDemographics (BGD) in 2001 as a demographic and analytic consultancy to meet the expanding demand for advanced analytic expertise in applied demographic research and analysis. Since then, my consultancy has broadened to include expert support of political, state, local, and school redistricting. Since 2001, BGD has undertaken over 150 such engagements in two broad areas:

1) state and local redistricting; and
2) applied demographic cases and studies

In 2024, I was appointed to the 2030 Census Advisory Committee.

The core of the BGD consultancy has been in state and local redistricting and bipartisan expert witness support of litigation. Engagements include:

Redistricting

- 2025-2026: In the matter of *Williams et al. v. Board of Elections of the State of New York* Supreme Court of the State of New York, County of New York - No. 164002-2025. Providing expert demographic and analytic litigation support to Defendants. Case lost at the New York Supreme Court level, but successfully stayed by the U.S. Supreme Court.
    - https://thearp.org/litigation/williams-v-nysboe/
    - https://www.scotusblog.com/2026/03/supreme-court-grants-republicans-request-to-pause-order-to-redraw-new-york-congressional-map/

- 2025-2026: In the matter of *Aquina v. Hazleton School District* in the United States District Court, Middle District of Pennsylvania. Providing expert demographic and analytic litigation support to Defendants.
    - https://dockets.justia.com/docket/pennsylvania/pamdce/3:2024cv00206/141030

- 2025-2026: In the matter of *Jaso v. Angleton School District* in the US District Court for the Southern District of Texas. Providing expert demographic and analytic litigation support to Defendants.
    - https://dockets.justia.com/docket/texas/txsdce/3:2024cv00194/1964626

- 2024-2025: In the matter of *Bautista v. Humble School District* in the US District Court for the Southern District of Texas. Providing expert demographic and analytic litigation support to Defendants. Case withdrawn by Plaintiffs.
    - https://dockets.justia.com/docket/texas/txsdce/4:2024cv01744/1959524

- 2024-2025: In the matter of *CMA v. Thurston* in the US District Court for the Eastern District of Arkansas. Providing expert demographic and analytic litigation support to Defendants, who prevailed.
    - https://arkansasadvocate.com/2023/12/06/federal-panel-allows-4th-arkansas-congressional-redistricting-lawsuit-to-continue/#:~:text=Thurston%20%E2%80%94%20This%20was%20the%20only,subject%2Dmatter%20jurisdiction%20in%20May.

- 2024: Providing expert demographic and analytic litigation support to Franklin County Public Utility District (PUD) in defense of Washington Voting Rights Act violation claim by UCLA Voting Rights Project.

- https://www.nbcrightnow.com/news/franklin-county-puds-at-large-election-system-challenged-by-voting-rights-project/article_c06332a2-250f-11ef-8b04-17ccb3eda4e3.html

- 2024: In the matter of *Jessica Garcia Shafer and Dona Kim Murphey v. Pearland Independent School District, et al.* in the US District Court for the Southern District of Texas. Providing expert demographic and analytic litigation support to Defendants.
  - https://dockets.justia.com/docket/texas/txsdce/3:2022cv00387/1894835

- 2023: In the matter of *Grace, Inc. v. City of Miami* in the US District Court for the Southern District of Florida. Providing expert demographic and analytic litigation support to Defendants.
  - https://thearp.org/litigation/grace-inc-v-city-miami/

- 2023: In the matter of *Navajo Nation v. San Juan County Board of Commissioners* in the US District Court for the District of New Mexico. Providing expert demographic and analytic litigation support to Defendants. Deposed in May 2023.
  - https://dockets.justia.com/docket/new-mexico/nmdce/1:2022cv00095/470450

- 2022: In the matter of *White v. Mississippi State Board of Election Commissioners* in United States District Court, Northern District of MS, in collaboration with demographic testifying expert Dr. David Swanson, on behalf of Defendants. Provided expert demographic and analytic litigation support of the MS Supreme Court redistricting litigation.
  - https://www.aclu-ms.org/en/cases/white-v-mississippi-board-election-commissioners

- 2022: Retained as demographic and redistricting expert for the Louisiana Attorney General in *Robinson v. Ardoin* and *Galmon v. Ardoin* and related Louisiana redistricting litigation. Offering opinions on demography and redistricting for their congressional redistricting plan and Plaintiff's proposed illustrative plans as a testifying expert.
  - https://news.ballotpedia.org/2022/04/04/louisiana-enacts-new-congressional-district-boundaries-after-legislature-overrides-governors-veto/

- 2022: Retained by counsel as demographic and redistricting expert for the Kansas Legislature in support of *Rivera et al. v Schwab* litigation. The Kansas Supreme Court found in favor of the Kansas Legislature's plan on June 21, 2022.
  - https://thearp.org/litigation/rivera-v-schwab/

- https://www.kscourts.org/KSCourts/media/KsCourts/Opinions/125092_1.pdf?ext=.pdf

- 2022: Retained by counsel as demographic and redistricting expert for the Defendants (State of Michigan) in the matter of *Banerian v. Benson* and related Michigan litigation. Offering opinions on demography and redistricting for Michigan's Congressional redistricting plan. Case resolved in favor of the Defendants by the US Supreme Court.
  - https://www.scotusblog.com/case-files/cases/banerian-v-benson/

- 2021: Retained as demographic and redistricting expert for the Wisconsin Legislature in *Johnson v. Wisconsin Elections Commission*, No. 2021AP001450-OA (Wis. Supreme Court) and related Wisconsin redistricting litigation. Offering opinions on demography and redistricting for redistricting plans proposed as remedies in an impasse suit. The Wisconsin Supreme Court decided in favor of the Democratic Governor's plan on March 2, 2022. This decision was appealed to SCOTUS. On March 25, 2022 – the US Supreme Court returned the case to the Wisconsin Supreme Court. On April 16, 2022, the Wisconsin Supreme Court found in favor of the Wisconsin Legislative plan, and the case was resolved.
  - https://www.wpr.org/us-supreme-court-rejects-legislative-map-drawn-evers-was-endorsed-wisconsin-supreme-court
  - https://www.nytimes.com/2022/04/15/us/wisconsin-districts-gerrymander-supreme-court.html

- 2021: Retained as demographic and redistricting expert by counsel for Galveston County, TX. Galveston County, TX, was later sued by the US Department of Justice (*Petteway v. Galveston County, Texas*). Testified before U.S. District Judge Jeffrey Vincent Brown, who found for the Plaintiffs. Judge Brown said of my testimony, "The court credits Bryan – an eminently believable witness" and that I "testified credibly". Defendants appealed to SCOTUS, which reviewed the case in December 2023 and refused to intervene. The case will continue in 2024 before the 5th Circuit Court.
  - https://thearp.org/litigation/united-states-v-galveston-county-tex/
  - https://www.scotusblog.com/2023/12/supreme-court-wont-block-new-maps-for-galveston-county/

- 2021: Retained as demographic and redistricting expert by the State of Alabama Attorney General's office in the matters of *Milligan v. Merrill*, *Thomas v. Merrill,* and *Singleton v. Merrill* over Alabama's Congressional redistricting initiatives. My testimony and analysis were not credited in the court's decision.

- 2021: Retained as nonpartisan demographic and redistricting expert by counsel in the State of North Carolina to prepare commissioner redistricting plans for Granville County, Harnett, Jones, and Nash County. Each proposed plan was approved and successfully adopted.

- 2021: Served as Consultant to the Arizona Independent Redistricting Commission, presenting "Pros and Cons of (Census data) Differential Privacy". July 13, 2021.
  - https://irc.az.gov/sites/default/files/meeting-agendas/Agenda%207.13.21.pdf

- 2021: Retained as demographic and redistricting expert by Democratic Counsel for the State of Illinois in the case of *McConchie v. State Board of Elections*. Prepared expert report in defense of using the American Community Survey to comply with state constitutional
  - https://redistricting.lls.edu/case/mcconchie-v-ill-state-board-of-elections/.

- 2021: Retained by counsel for the Chairman and staff of the Texas House Committee on Redistricting as a consulting demographic expert. Texas House Bill 1 was subsequently passed by the Legislature 83-63.
  - https://capitol.texas.gov/BillLookup/History.aspx?LegSess=873&Bill=HB1

- 2021: In the matter of the *State of Alabama, Representative Robert Aderholt, William Green, and Camaran Williams v. the US Department of Commerce; Gina Raimondo; the US Census Bureau, and Ron Jarmin* in the US District Court of Alabama Eastern Division. Prepared a demographic report for Plaintiffs analyzing the effects of using Differential Privacy on Census Data in Alabama, and was certified as an expert witness by the Court.
  - https://www.alabamaag.gov/Documents/news/Census%20Data%20Manipulation%20Lawsuit.pdf
  - https://www.courtlistener.com/docket/59728874/3/6/the-state-of-alabama-v-united-states-department-of-commerce/

- 2020-2021: Providing expert demographic and analytic litigation support for Franklin County, WA (in collaboration with Dr. Peter Morrison) in defense of a Washington Voting Rights Act violation claim by the UCLA Voting Rights Project. The case later proceeded (without my participation) to become *Gimenez v. Franklin County, WA*.
  - https://thearp.org/litigation/gimenez-v-franklin-county-washington/

- 2020: In the matter of The Christian Ministerial Alliance (CMA), *Arkansas Community Institute v. the State of Arkansas.* In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Providing demographic and analytic litigation support.

- https://www.naacpldf.org/wp-content/uploads/CMA-v.-Arkansas_FILED-without-stamp.pdf

- 2020: In the matter of *Aguilar, Gutierrez, Montes, Palmer, and OneAmerica v. Yakima County* in the Superior Court of Washington under the Washington Voting Rights Act ("WVRA" Wash. Rev. Code § 29A.92.60). In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Providing demographic and analytic litigation support.
  - https://bloximages.newyork1.vip.townnews.com/yakimaherald.com/content/tncms/assets/v3/editorial/a/4e/a4e86167-95a2-5186-a86c-bb251bf535f1/5f0d01eec8234.pdf.pdf

- 2018-2020: In the matter of *Rene Flores, Maria Magdalena Hernandez, Magali Roman, Make the Road New York, and New York Communities for Change v. Town of Islip, Islip Town Board, Suffolk County Board of Elections* in US District Court. On behalf of Defendants - provided a critical analysis of the plaintiff's demographic and environmental justice analysis. The critique revealed numerous flaws in both the demographic analysis as well as the tenets of their environmental justice argument, which were upheld by the court. Ultimately, developed a mutually agreed upon plan for districting.
  - https://nyelectionsnews.wordpress.com/2018/06/20/islip-faces-section-2-voting-rights-act-challenge/
  - https://casetext.com/case/flores-v-town-of-islip-3

- 2017-2020 In the matter of *NAACP, Spring Valley Branch; Julio Clerveaux; Chevon Dos Reis; Eric Goodwin; Jose Vitelio Gregorio; Dorothy Miller; and Hillary Moreau v East Ramapo Central School District (Defendant)* in United States District Court Southern District of New York (original decision May 25, 2020), later the U.S. Second Circuit Court of Appeals. On behalf of Defendants, developed a mutually agreed-upon district plan and provided demographic and analytic litigation support.
  - https://www.lohud.com/story/news/education/2020/05/26/federal-judge-sides-naacp-east-ramapo-voting-rights-case/5259198002/

- 2017-2020: In the matter of *Pico Neighborhood Association et al v. City of Santa Monica,* brought under the California VRA. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Providing demographic and analytic litigation support. Executed geospatial analysis to identify concentrations of Hispanic and Black CVAP to determine the impossibility of creating a minority majority district, and demographic analysis to show the dilution of Hispanic and Black voting strength in a district (vs at-large)

system. Work contributed to the Defendants' prevailing in a landmark ruling in the State of California Court of Appeals, Second Appellate District.

- https://www.santamonica.gov/press/2020/07/09/santa-monica-s-at-large-election-system-affirmed-in-court-of-appeal-decision

- 2019: In the matter of *Johnson v. Ardoin / the State of Louisiana* in the US District Court. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided expert demographic and analytic litigation support.
  - https://www.brennancenter.org/sites/default/files/2019-10/2019-10-16-Johnson%20v_%20Ardoin-132-Brief%20in%20Opposition%20to%20MTS.pdf
  - https://casetext.com/case/johnson-v-ardoin

- 2019: In the matter of *Suresh Kumar v. Frisco Independent School District et al*. in the US District Court. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided expert demographic and analytic litigation support. Successfully defended.
  - https://www.friscoisd.org/news/district-headlines/2020/08/04/frisco-isd-wins-voting-rights-lawsuit
  - https://www.courthousenews.com/wp-content/uploads/2020/08/texas-schools.pdf
- 2019: At the request of the City of Frisco, TX, in collaboration with demographic testifying expert Dr. Peter Morrison. Provided expert demographic assessment of the City's potential liability regarding a potential Section 2 Voting Rights challenge.

- 2019: In the matter of *Vaughan v. Lewisville Independent School District et al.* in the US District Court. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided expert demographic and analytic litigation support.
  - https://www.nbcdfw.com/news/local/lawsuit-filed-against-lewisville-independent-school-district/1125/

- 2019: In the matter of *Holloway, et al. v. City of Virginia Beach* in the US District Court, Eastern District of Virginia. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided expert demographic and analytic litigation support.
  - https://campaignlegal.org/cases-actions/holloway-et-al-v-city-virginia-beach

- 2018: At the request of Kirkland City, Washington, in collaboration with demographic testifying expert Dr. Peter Morrison. Performed demographic studies to inform the City's governing board's deliberations on whether to change from at-large to single-member

district elections following enactment of the Washington Voting Rights Act. Analyses included gauging the voting strength of the City's Asian voters, forming an illustrative district concentrating Asians, and comparing minority population concentration in pre- and post-annexation city territory.

- https://www.kirklandwa.gov/Assets/City+Council/Council+Packets/021919/8b_SpecialPresentations.pdf#:~:text=RECOMMENDATION%3A%20It%20is%20recommended%20that%20City%20Council%20receive,its%20Councilmembers%20on%20a%20citywide%2C%20at-%20large%20basis

- 2018: At the request of Tacoma, WA Public Schools, in collaboration with demographic testifying expert Dr. Peter Morrison. Created draft concept redistricting plans that would optimize minority population concentrations while respecting incumbency. The client used this plan as a point of departure for negotiating final boundaries among incumbent elected officials.

- 2018: At the request of the City of Mount Vernon, Washington, in collaboration with demographic testifying expert Dr. Peter Morrison. Prepared numerous draft concept plans that preserved Hispanics' CVAP concentration. Client utilized draft concept redistricting plans to work with elected officials and the community to agree upon the boundaries of six other districts to establish a proposed new seven-district single-member district plan.

- 2017: In the matter of *Pico Neighborhood Association v. City of Santa Monica*. In collaboration with demographic testifying expert Dr. Peter Morrison. Worked to create draft district concept plans that would satisfy Plaintiff's claim of being able to create a majority-minority district to satisfy Gingles Prong 1. Such a district was not possible, and the Plaintiffs' case ultimately failed in the California State Court of Appeals, Second Appellate District.
  - https://law.justia.com/cases/california/court-of-appeal/2020/b295935.html

- 2017: In the matter of *John Hall, Elaine Robinson-Strayhorn, Lindora Toudle, Thomas Jerkins, v. Jones County Board of Commissioners*. In collaboration with demographic testifying expert Dr. Peter Morrison. Worked to create draft district concept plans to resolve claims of discrimination against African Americans attributable to the existing at-large voting system.
  - http://jonescountync.gov/vertical/sites/%7B9E2432B0-642B-4C2F-A31B-CDE7082E88E9%7D/uploads/2017-02-13-Jones-County-Complaint.pdf

- 2017: In the matter of *Harding v. County of Dallas* in the US District Court. In collaboration with demographic testifying expert Dr. Peter Morrison. In a novel case alleging discrimination *against* White, non-Hispanics under the VRA, I was retained by plaintiffs to create

redistricting scenarios with different balances of White-non-Hispanics, Blacks, and Hispanics. Deposed and provided expert testimony on the case.

- https://www.courthousenews.com/wp-content/uploads/2018/08/DallasVoters.pdf

- 2016: Retained by The Equal Voting Rights Institute to evaluate the Dallas County Commissioners' existing enacted redistricting plan. In collaboration with demographic testifying expert Dr. Peter Morrison, the focus of our evaluation was twofold: (1) to assess the failure of the Enacted Plan (EP) to meet established legal standards and its disregard of traditional redistricting criteria; (2) to consider the possibility of drawing an alternative Remedial Plan (RP) that would meet established legal standards and balance traditional redistricting criteria.
  - http://equalvotingrights.org/wp-content/uploads/2015/01/Complaint.pdf

- 2016: In the matter of *Jain v. Coppell ISD et al* in the US District Court (Texas). In collaboration with demographic testifying expert Dr. Peter Morrison. Consulted in defense of Coppell Independent School District (Dallas County, TX) to resolve claims of a discriminatory at-large voting system affecting Asian Americans. While Asians were shown to be sufficiently numerous, I was able to demonstrate that they were not geographically concentrated, thus successfully proving the Gingles 1 precondition could not be met, resulting in the complaint being withdrawn.
  - https://dockets.justia.com/docket/texas/txndce/3:2016cv02702/279616

- 2016: In the matter of *Feldman et al v. Arizona Secretary of State's Office et al* in SCOTUS. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided analytics on the locations and proximal demographics of polling stations that had been closed subsequent to *Shelby County v. Holder* (2013), which eliminated the requirement of state and local governments to obtain federal preclearance before implementing any changes to their voting laws or practices. Subsequently, provided an expert point of view on disparate impact as a result of H.B. 2023. Advised Maricopa County officials and lead counsel on remediation options for primary polling place closures in preparation for the 2016 elections.
  - https://arizonadailyindependent.com/2016/04/05/doj-wants-information-on-maricopa-county-election-day-disaster/
  - https://www.supremecourt.gov/DocketPDF/19/19-1257/142431/20200427105601341_Brnovich%20Petition.pdf

- 2016: In the matter of *Glatt v. City of Pasco, et al.* in the US District Court (Washington). In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Provided analytics and draft plans in defense of the City of Pasco. One draft plan was adopted, changing the Pasco electoral system from at-large to a six-district + one at-large.
    - https://www.pasco-wa.gov/DocumentCenter/View/58084/Glatt-v-Pasco---Order---January-27-2017?bidId=
    - https://www.pasco-wa.gov/923/City-Council-Election-System

- 2015: In the matter of *The League of Women Voters et al. v. Ken Detzner et al* in the Florida Supreme Court. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Performed a critical review of the Florida state redistricting plan and developed numerous draft concept plans.
    - http://www.miamiherald.com/news/politics-government/state-politics/article47576450.html
    - https://www.floridasupremecourt.org/content/download/322990/2897332/file/OP-SC14-1905_LEAGUE%20OF%20WOMEN%20VOTERS_JULY09.pdf

- 2015: In the matter of *Evenwel, et al. v. Abbott / State of Texas* in SCOTUS. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Plaintiffs. Successfully drew a map for the State of Texas, balancing both total population from the decennial census and citizen population from the ACS (thereby proving that this was possible). We believe this may be the first and still only time this technical accomplishment has been achieved in the nation at a state level. Co-authored SCOTUS Amicus Brief of Demographers.
    - https://www.supremecourt.gov/opinions/15pdf/14-940_ed9g.pdf
    - https://www.scotusblog.com/wp-content/uploads/2015/08/Demographers-Amicus.pdf

- 2015: In the matter of *Ramos v. Carrollton-Farmers Branch Independent School District* in the US District Court (Texas). In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Used 2009-2013 5-year ACS data to generate small-area estimates of minority citizen voting-age populations and create a variety of draft concept redistricting plans. The case was settled in favor of a novel cumulative voting system.
    - https://starlocalmedia.com/carrolltonleader/c-fb-isd-approves-settlement-in-voting-rights-lawsuit/article_92c256b2-6e51-11e5-adde-a70cbe6f9491.html

- 2015: In the matter of *Glatt v. City of Pasco et al.* in the US District Court (Washington). In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Consulted on forming a new redistricting plan for the city council review. One draft concept plan was agreed to and adopted.
    - https://www.pasco-wa.gov/923/City-Council-Election-System

- 2015: At the request of Waterbury, Connecticut, in collaboration with demographic testifying expert Dr. Peter Morrison. As a result of a successful ballot measure to convert Waterbury from an at-large to a 5-district representative system, I consulted on extensive public outreach and drafted numerous concept plans. The Waterbury Public Commission considered alternatives and recommended one of our plans, which the City adopted.
    - http://www.waterburyobserver.org/wod7/node/4124

- 2014-15: In the matter of *Montes v. City of Yakima* in the US District Court (Washington). In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants. Analytics were later used to support the Amicus Brief of the City of Yakima, Washington, in the U.S. Supreme Court in *Evenwel v. Abbott*.
    - https://casetext.com/case/montes-v-city-of-yakima-3

- 2014: In the matter of *Harding v. County of Dallas* in the US Court of Appeals Fifth Circuit. In the novel case of Anglo plaintiffs attempting to claim relief as protected minorities under the VRA. Served as a demographic expert in the sole capacity of proving Plaintiff's claim under Gingles prong 1. The claim was proven. Gingles prongs 2 and 3 were not, and the case failed.
    - https://electionlawblog.org/wp-content/uploads/Dallas-opinion.pdf

- 2014: At the request of Gulf County, Florida, in collaboration with demographic testifying expert Dr. Peter Morrison. Upon the decision of the Florida Attorney General to force inclusion of prisoners in redistricting plans – drafted numerous concept plans for the Gulf County Board of County Commissioners, one of which was adopted.
    - http://myfloridalegal.com/ago.nsf/Opinions/B640990E9817C5AB85256A9C00631387

- 2012-2015: In the matter of *GALEO and the City of Gainesville* in Georgia. In collaboration with demographic testifying expert Dr. Peter Morrison, on behalf of Defendants, consulted on the defense of the existing at-large city council election system.
    - http://atlantaprogressivenews.com/2015/06/06/galeo-challenges-at-large-voting-in-city-of-gainesville/

- 2012-: Confidential. Consulted (through Morrison & Associates) to support plan evaluation, litigation, and outreach to city and elected officials (1990s - mid-2000s). Executed the first statistical analysis of the American Community Survey to determine probabilities of minority-majority populations in split statistical/administrative units of geography, as well as the cumulative probabilities of a "false-negative" minority-majority reading among multiple districts.

National Voting Rights Act (NVRA) Cases

In addition to political redistricting cases, BGD has provided demographic and analytic expertise in National Voter Registration Act (NVRA) cases. Examples include:

- 2024: In the matter of *Green v. Bell* (NC Board of Elections) in the US District Court for the Western District of North Carolina, Charlotte Division. Providing expert demographic support to Plaintiffs, analyzing the American Community Survey (ACS) and the US Election Administration and Voting Survey (EAVS) to measure and assess compliance with the National Voter Registration Act (NVRA). Case successfully resolved with a settlement.
  - https://www.democracydocket.com/cases/north-carolina-voter-purge-nvra-challenge/
- 2024: In the matter of *Swoboda v. Fontes* (AZ Secretary of State) in the US District Court for the District of Arizona. Providing expert demographic support to Plaintiffs, analyzing the American Community Survey (ACS) and the US Election Administration and Voting Survey (EAVS) to measure and assess compliance with the National Voter Registration Act (NVRA). Case dismissed Dec. 5, 2024, on standing; appeal pending.
  - https://prod-static.protectthevote.com/media/document/filing/AZ_NVRA_complaint_01wik4ab.pdf

School Redistricting and Municipal Infrastructure Projects

BGD worked with McKibben Demographics from 2004 to 2012, providing expert demographic and analytic support. These engagements involved developing demographic profiles of small areas to assist in building fertility, mortality, and migration models used to support long-range population forecasts and infrastructure analysis in the following communities:

Fargo, ND 10/2012
Columbia, SC 3/2012
Madison, MS 9/2011
Rockwood, MO 3/2011
Carthage, NY 3/2011
NW Allen, IN 9/2010
Fayetteville, AR 7/2010
Atlanta, GA 2/2010
Caston School Corp., IN 12/09
Rochester, IN 12/09
Urbana, IL 11/09
Dekalb, IL 11/09
Union County, NC 11/09
South Bend, IN 8/09
Lafayette, LA 8/09
Fayetteville, AR 4/09
New Orleans, LA 4/09
Wilmington New Hanover 3/09
New Berry, SC 12/08
Corning, NY 11/08
McLean, IL 11/08
Lakota 11/08
Greensboro, NC 11/08
Guilford 9/08
Lexington, SC 9/08
Plymouth, IN 9/08
Charleston, SC 8/08
Woodland, IL 7/08
White County, IN 6/08
Gurnee District 56, IL 5/08
Central Noble, IN 4/08
Charleston First Baptist, SC 4/08
Edmond, OK 4/08
East Noble, IN 3/08
Mill Creek, IN 5/06
Rhode Island 5/06
Garrett, IN 3/08
Meridian, MS 3/08
Madison County, MS 3/08
Charleston 12/07
Champaign, IL 11/07
Richland County, SC 11/07
Lake Central, IN 11/07
Columbia, SC 11/07
Duneland, IN 10/07
Union County, NC 9/07
Griffith, IN 9/07
Rensselaer, IN 7/07
Hobart, IN 7/07
Buffalo, NY 7/07
Oak Ridge, TN 5/07
Westerville, OH 4/07

Projects Continued

Baton Rouge, LA 4/07
Cobb County, GA 4/07
Charleston, SC District 20 4/07
McDowell County, NC 4/07
East Allen, IN 3/07
Mt. Pleasant, SC District 2 2/07
Peach County, GA 2/07
North Charleston, SC District 4 2/07
Madison County, MS revisions 1/07
Portage County, IN 1/07
Marietta, GA 1/07
Porter, IN 12/06
Harrison County, MS 9/06
New Albany/Floyd County, IN 9/06
North Charleston, SC 9/06
Fairfax, VA 9/06
Coleman 8/06
DeKalb, GA 8/06
LaPorte, IN 7/06
NW Allen, IN 7/06
Brunswick, NC 7/06
Carmel Clay, IN 7/06
Calhoun, SC 5/06
Hamilton Community Schools, IN 4/06
Dilworth, MN 4/06
Hamilton, OH 2/06
West Noble, IN 2/06
New Orleans, LA 2/06
Norwell, IN 2/06
Middletown, OH 12/05
West Noble, IN 11/05
Madison, MS 11/05
Fremont, IN 11/05
Concord, IN 11/05
Allen County 11/05
Bremen, IN 11/05
Smith Green, IN 11/05
Steuben, IN 11/05
Plymouth, IN 11/05
North Charleston, SC 11/05
Huntsville, AL 10/05
Dekalb, IN 9/05
East Noble, IN 9/05
Valparaiso, IN 6/05
Penn-Harris-Madison, IN 7/05
Elmira, NY 7/05
South Porter/Merriville, IN 7/05
Fargo, ND 6/05
Washington, IL 5/05
Addison, NY 5/05
Kershaw, SC 5/05
Porter Township, IN 3/05
Portage, WI 1/05
East Stroudsburg, PA 12/04
North Hendricks, IN 12/04
Sampson/Clinton, NC 11/04
Carmel Clay Township, IN 9/04
SW Allen County, IN 9/04
East Porter, IN 9/04
Allen County, IN 9/04
Duplin, NC 9/04
Hamilton County / Clay TSP, IN 9/04
Hamilton County / Fall Creek TSP, IN 9/04
Decatur, IN 9/04
Chatham County / Savannah, GA 8/04
Evansville, IN 7/04
Madison, MS 7/04
Vanderburgh, IN 7/04
New Albany, IN 6/04

Publications

- "Demographic and Economic Factors Affecting Broadband Access and Census Internet Self-Response Rates: Counties in Selected States" *Population Research and Policy Review* (with David A. Swanson and Jeff Tayman). May 2025.

- In the matter of *CMA v. Thurston*, No. 4:23-cv-471-DPM-DRS-JM, in the Eastern District Court of Arkansas. Declaration and Rebuttal: Declaration of Thomas M. Bryan. Assessing Plaintiffs' claims and alternative maps. October 2024.

- "Using cluster analysis to identify communities of interest for purposes of legislative redistricting: A case study of parishes in Louisiana" (with David A. Swanson), May 12, 2024, Papers in Applied Geography, DOI: 10.1080/23754931.2024.2346326
    - https://doi.org/10.1080/23754931.2024.2346326
    - https://sda-demography.org/news/13355939

- "Forensic Demography: An Overlooked Area of Practice among Applied Demographers" *Review of Economics and Finance* (with David A. Swanson and Jeff Tayman). January 2023.
    - https://refpress.org/ref-vol20-a94/

- In the matter of *Banerian v. Benson*, No. 1:22-CV-00054-RMK-JTN-PLM, in the US District Court of the Western District of Michigan. Declaration of Thomas Bryan. Assessing the performance of plaintiffs' and defendants' plans against the Michigan Constitution and traditional redistricting principles. February 2022.

- In the matter of *Johnson v. Wisconsin Elections Commission*, No. 2021AP001450OA, in the Supreme Court of Wisconsin. Declaration and Rebuttal of Thomas M. Bryan. Assessing the features of proposed redistricting plans by the Wisconsin Legislature and other parties to the litigation. December 2021.

- In the matters of *Caster v. Merrill* and *Milligan v. Merrill* in the US District Court of the Northern District of Alabama. Civil Action NOs. 2:21-cv-01536-AMM; 2:21-cv-01530-AMM. Declaration of Thomas Bryan. Assessing the compliance and performance of the demonstrative VRA congressional plans of Dr. Moon Duchin and Mr. William Cooper. December 2021.

- In the matter of *Milligan v. Merrill* in the US District Court of the Northern District of Alabama. Civil Action NO. 2:21-cv-01530-AMM. Declaration of Thomas M. Bryan. Assessing the

compliance and performance of the Milligan and State of Alabama congressional redistricting plans. December 2021.

- In the matter of *Singleton v. Merrill* in the US District Court of the Northern District of Alabama. Civil Action NO. 2:21-cv-01291-AMM. Declaration of Thomas M. Bryan. Assessing the compliance and performance of the Singleton and State of Alabama congressional redistricting plans. December 2021.

- "The Effect of the Differential Privacy Disclosure Avoidance System Proposed by the Census Bureau on 2020 Census Products: Four Case Studies of Census Blocks in Alaska" PAA Affairs, (with D. Swanson and Richard Sewell, Alaska Department of Transportation and Public Facilities). March 2021.
    - https://www.populationassociation.org/blogs/paa-web1/2021/03/30/the-effect-of-the-differential-privacy-disclosure
    - https://redistrictingonline.org/2021/03/31/study-census-bureaus-differential-privacy-disclosure-avoidance-system-produces-produces-concerning-results-for-local-jurisdictions/
    - https://www.ncsl.org/research/redistricting/differential-privacy-for-census-data-explained.aspx

- In the matter of the *State of Alabama, Representative Robert Aderholt, William Green, and Camaran Williams v. the US Department of Commerce; Gina Raimondo; the US Census Bureau, and Ron Jarmin* in the US District Court of Alabama Eastern Division. Declaration of Thomas M. Bryan, Exhibit 6. Civil Action NO. 3:21-CV-211, United States District Court for Middle Alabama, Eastern Division. Assessing the impact of the U.S. Census Bureau's approach to ensuring respondent privacy and Title XIII compliance by using a disclosure avoidance system involving differential privacy. March 2021.
    - https://redistricting.lls.edu/wp-content/uploads/AL-commerce2-20210311-PI.zip
    - https://www.alabamaag.gov/Documents/news/Census%20Data%20Manipulation%20Lawsuit.pdf
    - https://www.courtlistener.com/docket/59728874/3/6/the-state-of-alabama-v-united-states-department-of-commerce/

- Peter A. Morrison and Thomas M. Bryan, Redistricting: A Manual for Analysts, Practitioners, and Citizens (2019). Springer Press: Cham, Switzerland.
    - https://link.springer.com/book/10.1007/978-3-030-15827-9

- M.V. Hood III, Peter A. Morrison, & Thomas M. Bryan, From Legal Theory to Practical Application: A How-To for Performing Vote Dilution Analyses, 99 SOC. SCI. Q. 536, 536–52 (2018)
- In the Supreme Court of the United States, Sue Evenwel, Et Al., *Appellants,* V. Greg Abbott, in his official capacity as Governor of Texas, et al., *Appellees. On appeal from the United States District Court for the Western District of Texas*. *Amicus Brief of Demographers Peter A. Morrison, Thomas M. Bryan, William A. V. Clark, Jacob S. Siegel, David A. Swanson, and The Pacific Research Institute* - As *amici curiae* in support of Appellants. August 2015.
    - www.scotusblog.com/wp-content/uploads/2015/08/Demographers-Amicus.pdf

- Workshop on the Benefits (and Burdens) of the American Community Survey, Case Studies/Agenda Book 6 "Gauging Hispanics' Effective Voting Strength in Proposed Redistricting Plans: Lessons Learned Using ACS Data." June 14–15, 2012
    - http://docplayer.net/8501224-Case-studies-and-user-profiles.html

- "Internal and Short Distance Migration" by Bryan, Thomas in J. Siegel and D. Swanson (eds.) The Methods and Materials of Demography, Condensed Edition, Revised. (2004). Academic/Elsevier Press: Los Angeles (with D. Swanson and P. Morrison).

- "Population Estimates" by Bryan, Thomas in J. Siegel and D. Swanson (eds.) The Methods and Materials of Demography, Condensed Edition, Revised. (2004). Academic/Elsevier Press: Los Angeles (with D. Swanson and P. Morrison).

- Bryan, T. (2000). U.S. Census Bureau Population estimates and evaluation with loss functions. *Statistics in Transition,* 4, 537–549.

Professional Presentations and Conference Participation

- 2025 "Broadband, Race and Poverty in Rural Mississippi: 2020 Census Response Rates". February 4-6 at the PAA Applied Demography Conference (ADC) meetings, Tucson, AZ. With David Swanson and Jeff Tayman.

- 2024 "Use of Current Population Survey and Cooperative Election Study in Analyzing Registered Voter Turnout". June 5, 2024, at the American Statistical Association Symposium on Data Science and Statistics (SDSS) meetings, Richmond, VA.

- 2024 Uses of Demographic Data and Statistical Information Systems in Redistricting and Litigating Voting Rights Act Cases: Case studies of the CPS and CES, and the ACS and EAVS. Presented at the 2024 Population Association of America Applied Demography Conference, February 2024.

- https://events.rdmobile.com/Sessions/Details/2193084

- 2023 Population Association of America Applied Demography Conference, Annapolis, MD. February 2023.
  - https://events.rdmobile.com/Sessions/Details/2193084
  - "Applications of Differential Core Retention in Redistricting"
  - "Census CVAP vs. VAP in a Redistricting Context"
  - "Different Census Race Definitions in a Redistricting Context"

- 2022 Southern Demographic Association Meetings. "Census 2020 and Political Redistricting" session. Knoxville, TN, October 2022.
  - https://sda-demography.org/resources/Documents/SDA%202022%20Preliminary%20Program_Vfinal_V12.pdf
  - "Addressing Latent Demographic Factors in Redistricting: An Instructional Case" (with Dr. Peter Morrison)

- "Analysis of Differential Privacy and its Impacts on Redistricting" Presented as invited expert on the Panel on the 2020 Census at the American Statistical Association JSM meetings, Washington DC August 8, 2022.
  - https://ww2.amstat.org/meetings/jsm/2022/onlineprogram/AbstractDetails.cfm?abstractid=323887

- "Re-purposing Record Matching Algorithms to assess the effect of Differential Privacy on 2020 Small Area Census Data" SAE 2022: Small Area Estimation, Surveys and Data Science University of Maryland, College Park, USA 23 - 27 May, 2022. With Dr. David Swanson.
  - https://sae2022.org/program

- "Redistricting 101: A Tutorial" 2022 Population Association of America Applied Demography Conference, February 2022. With Dr. Peter Morrison.
  - https://www.populationassociation.org/paa2022/home

- "The Effect of the Differential Privacy Disclosure Avoidance System Proposed by the Census Bureau on 2020 Census Products: Four Case Studies of Census Blocks in Alaska". 2021 American Statistical Association - Symposium on Data Science and Statistics (ASA-SDSS). With Dr. David Swanson.
  - https://ww2.amstat.org/meetings/sdss/2021/index.cfm

- "New Technical Challenges in Post-2020 Redistricting" 2020 Population Association of America Applied Demography Conference, 2020 Census Related Issues, February 2021. With Dr. Peter Morrison.

- "Tutorial on Local Redistricting" 2020 Population Association of America Applied Demography Conference, February 2021. With Dr. Peter Morrison.

- "Demographic Constraints on Minority Voting Strength in Local Redistricting Contexts," 2019 Southern Demographic Association meetings (coauthored with Dr. Peter Morrison), New Orleans, LA, October 2019. Winner of the annual E. Walter Terrie award for best state and local demography presentation.
    - http://sda-demography.org/2019-new-orleans

- "Applications of Big Demographic Data in Running Local Elections" 2017 Population and Public Policy Conference, Houston, TX.

- "Distinguishing 'False Positives' Among Majority-Minority Election Districts in Statewide Congressional Redistricting," 2017 Southern Demographic Association meetings (coauthored with Dr. Peter Morrison), Morgantown, WV.

- "Devising a Demographic Accounting Model for Class Action Litigation: An Instructional Case" 2016 Southern Demographic Association (with Peter Morrison), Athens, GA.

- "Gauging Hispanics' Effective Voting Strength in Proposed Redistricting Plans: Lessons Learned Using ACS Data." 2012 Conference of the Southern Demographic Association, Williamsburg, VA.

- "Characteristics of the Arab-American Population from Census 2000 and 1990: Detailed Findings from PUMS." 2004 Conference of the Southern Demographic Association, (with Samia El-Badry) Hilton Head, SC.

- "Small-Area Identification of Arab American Populations," 2004 Conference of the Southern Demographic Association, Hilton Head, SC.

- "Applied Demography in Action: A Case Study of Population Identification." 2002 Conference of the Population Association of America, Atlanta, GA.

Professional Conference Chairs, Peer Reviews, and Conference Discussant Roles

- 2024 Population Association of America Applied Demography Conference, "Population Projections" session chairman. February 2024.
    - https://events.rdmobile.com/Sessions/Details/2195280

- 2023 Population Association of America Applied Demography Conference, "Uses of Census Data and New Analytical Approaches for Redistricting" session chairman. Annapolis, MD, February 2023.
    - https://www.populationassociation.org/events-publications/adc

  - DOJ Section 2 Data Requirements vs Reality and the Impact on Redistricting
  - DOJ ACS CVAP annual data file inconsistencies
  - Differences in CVAP and VAP Reported by the USCB and the Impact on Redistricting
  - Changing Multi-Race Definitions and the Impact on Redistricting

- 2020 Population Association of America "Assessing the Quality of the 2020 Census" session chairman, including Census Director Ron Jarmin. Virtual meeting, May 5, 2021.
  - https://paa2021.secure-platform.com/a/organizations/main/home
- "The Historical Roots of Contentious Litigation Over Census Counts in the Late 20th Century". Peer reviewer for presentation at the Hawaii International Conference on the Social Sciences, Honolulu, Hawaii, June 17-19, 2004, with David A. Swanson and Paula A. Walashek.
- 2004 - Population Research and Policy Review External Peer Reviewer / MS #253 "A New Method in Local Migration and Population Estimation".
- Session Discussant on "Spatial Demography" at the 2003 Conference of the Southern Demographic Association, Arlington, VA.
- Subject Moderator at the International Program Center (IPC) 2000 Summer Workshop on Subnational Population Projections for Planning, Suitland, MD.
- Session Chairman on "Population Estimates: New Evaluation Studies" at the 2002 Conference of the Southern Demographic Association, Austin, TX.
- Conference Session Chairman at the 2000 Conference of the Federal Forecasters Conference (FFC), Washington, DC.
- Session Discussant on "New Developments in Demographic Methods" at the 2000 Conference of the Southern Demographic Association, New Orleans, LA.
- Panel Discussant on GIS Applications in Population Estimates Review at the 2000 Conference of the Population Association of America, Los Angeles, CA.
- Panel Discussant on Careers in Applied Demography at the 2000 Conference of the Population Association of America, Los Angeles, CA.

Primary Software Competencies

ESRI ArcGIS

SAS

Microsoft Office

Professional Affiliations

American Statistical Association

Population Association of America

Southern Demographic Association

Relevant Work Experience

January 2001- April 2003 ESRI Business Information Solutions / Demographer

Responsibilities included demographic data management, small-area population forecasting, IS management, and software product and specification development. Additional responsibilities included developing GIS-based models of business and population forecasting, and analysis of emerging technology and R&D / testing of new GIS and geostatistical software.

May 1998-January 2001 U.S. Census Bureau / Statistician

Responsibilities: developed and refined small area population and housing unit estimates and innovative statistical error measurement techniques in support of the Population Estimates Program and the Current Population Survey.

Service

Eagle Scout, 1988, Boy Scouts of America. Member of the National Eagle Scout Association. Involved in the leadership of the Boy Scouts of America Heart of Virginia Council.

Founder: SCOVETH, Virginia Scouting and Veterans Oral History Project, in collaboration with the Virginia War Memorial →

References

Dr. David Swanson
Professional Peer
david.swanson@ucr.edu
951-534-6336

Dr. Peter Morrison
Professional Peer
petermorrison@me.com
310-266-9580

Exhibit B

Resume of Douglas Johnson, Ph.D.

P.O. Box 5271
Glendale, CA 91221
djohnson@NDCresearch.com

mobile: (310) 200-2058
office: (909) 624-1442
fax: (818) 254-1221

Employment

President, National Demographics Corporation, 2006 – present.
Fellow, Rose Institute of State and Local Government, 2001 – 2020.
Senior Analyst, National Demographics Corporation, 2001 – 2006.
Project Manager and Senior Manager at three internet startup companies, 1999 - 2001.
U.S. Representative Stephen Horn, Legislative Director and System Manager. 1993 – 1997.
Coro Foundation, Fellowship in Public Affairs. 1992 – 1993.
Rose Institute for State and Local Government, Student Manager. 1989 – 1992.

Education

Claremont Graduate University, Ph.D. in Political Science, 2015.
Dissertation: "Independent Redistricting Commissions: Hopes and Lessons Learned."
UCLA Anderson Graduate School of Management, MBA, 1999.
Claremont McKenna College, BA in Government (Political Science), 1992.

Academic Honors

Graduated Cum Laude from Claremont McKenna College.
Phi Beta Kappa. Philip Roland Prize for Excellence in Public Policy.

Publications and Articles

The CVRA [California Voting Rights Act] Tsunami Rolls Across California, with Dr. Justin Levitt. Paper presented at the American Political Science Association 2018 conference as part of the August 31, 2018, panel entitled "California Election Reform: Has It Improved Representation and Participation?"

Quiet Revolution in California Local Government Gains Momentum, Rose Institute of State and Local Government White Paper on California Voting Rights Act, November 3, 2016.

Visalia Times, "How to draw new city council districts," September 19, 2014.

Christian Science Monitor "Let the public help draw voting districts," October 25, 2013.

New York Times, "The Case for Open Primaries," February 19, 2009.

Los Angeles Times Opinion Articles:

"A neighbor's help on redistricting" June 24, 2007.
"A Trojan horse primary for the GOP" February 25, 2007.
"Where a porn palace stood" (article on redevelopment), July 30, 2006.

Fresno Bee Opinion Article: "The Poison Handshake" June 15, 2004.

Redistricting in America. Rose Institute of State and Local Government, 2010.

Restoring the Competitive Edge: California's Need for Redistricting Reform and the Likely Impact of Proposition 77. Rose Institute of State and Local Government, 2005.

"Competitive Districts in California" Rose Institute of State and Local Government, 2005.

Latinos and Redistricting: "Californios For Fair Representation" and California Redistricting in the 1980s. Rose Institute of State and Local Government, 1991.

Independent and Advisory Commission Redistricting Projects

Ohio Redistricting Commission, "Independent Map-Drawer," 2022
Arizona Independent Redistricting Commission, lead technical consultant, 2021
Santa Barbara County Independent Redistricting Commission, technical consultant, 2021
City of Menlo Park Advisory Districting Commission, lead technical consultant, 2018
Arizona Independent Redistricting Commission, lead technical consultant, 2001-2008

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Independent and Advisory Commission Redistricting Projects (continued)

San Diego City Council Independent Redistricting Commission, lead technical consultant, 2011
City of Surprise Advisory Commission on Redistricting, 2011
Pasadena City Council Advisory Commission on Redistricting, co-lead technical consultant, 2011
Pasadena Unified School Board Advisory Commission on Redistricting, co-lead technical consultant, 2011
City of Modesto Independent Redistricting Commission, lead technical consultant, 2011
City of Modesto Independent Districting Commission, lead technical consultant, 2008

Speaker or Panelist

California Special Districts Association, Board Secretaries Conference Presenter, "Navigating a Transition to By-District Elections," October 22, 2024
California Special Districts Association, Annual Conference Presenter, "The State of the California Voting Rights Act," April 2, 2024.
California City Clerk Association New Law Conference, Presenter, "New Laws for District Elections: Santa Monica and FAIR MAPS Act Changes," December 15, 2023.
California Special Districts Association, Board Secretaries Conference, Presenter, "The California Voting Rights Act and the FAIR MAPS Act: All new rules in 2024," November 8, 2023.
California Association of School Business Officers Northern Section Professional Development Institute, Presenter, "20 Years Later: An Update on the California Voting Rights Act and By-Trustee Area Elections," February 3, 2023.
California Conference of School Attorneys, Presenter, "California Voting Rights Act and By-Trustee Area Elections," December 1, 2022.
California Special District Association, Board Secretaries and Clerks Conference, Presenter, "Into the Tsunami: The California Voting Rights Act, Redistricting and Board Elections, November 9, 2022.
California State University San Marcos Leadership North County fellowship, Presenter, "To District or Not To District," October 20, 2022.
South Bay Council of Governments Meeting, Presenter, "To District or Not To District," April 20, 2022.
California League of Cities Los Angeles County Chapter, Keynote Speaker, "Redistricting Wrap-Up", March 3, 2022.
Tri-County Chamber of Commerce, "Redistricting Update," December 3, 2021.
Gateway Cities Council of Governments Meeting, Presenter, "2021 Redistricting: Everything Has Changed . . . Again," January 14, 2021.
California League of Cities Mayors and Council Members Executive Forum, "Coping with the New Reality of By-District Elections," June, 2020.
San Gabriel Valley Economic Partnership, ,June 26, 2019
Community Roundtable, " What's at Stake in the 2020 Census?," Hosted by U.S. Representative Ted Lieu. June 19, 2019.
Community Roundtable, "The Importance of the Census," Hosted by U.S. Representative Judy Chu. May 30, 2019.
League of Women Voters of Burbank and Glendale, Keynote Speaker, "Town Hall meeting on SB415" (The California Voter Participation Rights Act), May 8, 2018.
California League of Cities, City Manager Department Annual Conference, Panelist, "CVRA and the Profound Impact on Local Governance," February 15, 2019.
California League of Cities, Mayors and Councilmembers Executive Forum, Moderator, "The California Voting Rights Act and the District-Drawing Process," June 29, 2018.
California League of Cities, City Attorney Department, panelist, "The California Voting Rights Act: Recent Legislation & Litigation Outcomes," May 3, 2018.
California League of Cities, City Clerk Department, Co-Presenter, "California Voting Rights Act – Transitioning From At-Large To By-District Elections: A Practical Guide For City Clerks," April 19, 2018.
California School Board Association Annual Education Conference panelist: "15 Years with the California Voting Rights Act: Lessons Learned and Challenges Ahead." December 1, 2017.
University of California's National Public Service Law Conference: Civil Rights in the 21st Century: Moderator, "Voting Rights 101." September 23, 2017.

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Speaker or Panelist (continued)

City Clerks Association of California Annual Conference panelist: "California Voting Rights Act: Putting the 2016 Legislation into Practice." April 13, 2017.

California School Board Association Annual Education Conference panelist: "The California Voting Rights Act: What Board Members Must Know." December 4, 2015.

Associated Cities of California – Orange County, Keynote Speaker, Newly Elected Officials' Reception and Dinner, "The California Voting Rights Act," January 29, 2015.

California League of Cities, City Manager Department, 2015 Department Meeting: "Opportunity to Engage Residents: The California Voting Rights Act." January 29, 2015.

California League of Cities, City Clerk Department, 2014 Annual Meeting: "Whose Line Is It Anyway: Making the transition from at-large to by-district elections." September 3, 2014.

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2007 Spring Forum, "The Arizona Independent Redistricting Commissions' experiences with the first-ever independent redistricting."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2008 Spring Forum, "Communities of Interest In Redistricting: A Practical Guide."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2009 Fall Forum, "The Key to Successful Redistricting."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2010 Spring Forum, "Communities of Interest in Redistricting: A key to drawing 2011 plans (and for their defense)."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2011 Winter Forum, "Citizen Voting Age Data from a line-drawer's viewpoint."

Luncheon Keynote Speaker, Santa Barbara's Channel Cities Club, "California's next experiment: independent, public redistricting," January 18, 2011.

Annual Conference, Arizona League of Cities and Towns, Presenter at "Redistricting Law and the Voting Rights Act: What It Means for Your City or Town in 2011," August 25, 2010.

Redistricting, The 2010 Census, and Your Budget, Sponsored by the Rose Institute of State and Local Government, California League of Cities, October 15, 2009.

Arizona Election Law 2010 Continuing Legal Education Conference, "Communities of interest and technology in redistricting," sponsored by the Arizona State Bar Association, March 2010.

California's New Independent Redistricting Commission, sponsored by the Irvine Foundation and the California Redistricting Collaborative, December 15, 2009.

Tribal Association of Sovereign Indian Nations (TASIN) Legislative Day 2009, "The 2010 Census and 2011 Redistricting in California," December 2, 2009.

California School Board Association, "Litigation Issues and the California Voting Rights Act," December 4, 2009.

California Latino School Boards Association, "Introduction to the California Voting Rights Act," August 20, 2009.

Building a National Reform Movement, Salt Lake City, Utah, 2006, conference on redistricting .reform hosted by the League of Women Voters, Campaign Legal Center, and The Council for Excellence in Government.

Texas Tech University, "A Symposium on Redistricting," May, 2006.

California League of Cities, "Introduction to the California Voting Rights Act."

Voices of Reform, a project of the Commonwealth Club of San Francisco: multiple forums on redistricting and / or term limits, 2006 – 2007.

Classroom speaker at Bellflower High School, Pepperdine University, the University of La Verne, Pomona College and Claremont McKenna College.

Charter and/or Ballot Language Consultant

Castaic Lake Water Agency and Newhall County Water District consultant advising on process, rules and legislation language for merger of the two districts including changing from at-large to by-district election system. (2015-2016)

City of Corona: consultant for City Council on a potential city charter and a move to by-district elections. (2015-2016)

Charter and/or Ballot Language Consultant (continued)

City of El Cajon: consulted on writing of charter revision and public education campaign for ballot measure changing from at-large to by-district City Council elections. (2016)

City of Goleta: consulted on development of ordinances and ballot language asking voters what election system they preferred. (2003 – 2004)

City of Menifee: advised commission considering language on by-district elections. (2009 – 2010)

City of Modesto: advised commission that successfully developed a city charter change moving Modesto from at-large to by-district elections and created an independent redistricting commission. (2006 – 2008)

City of Pasadena (on behalf of Pasadena Unified School District): advised commission that successfully developed a city charter change moving Pasadena Unified from at-large to by-district elections and created a redistricting commission. (2011 – 2012)

Litigation Experience

Expert witness declaration for Rancho Santa Margarita in *Michelle Jackson vs City of Rancho Santa Margarita*, Orange County Superior Court Case No. 30-2024-01419113-CU-WM-WJC.

Expert witness declaration in the remedy stage of the California Voting Rights Act and FAIR MAPS Act filed for the City of Ontario, California, in the ongoing case of *Chris Robles vs City of Ontario*, San Bernardino County Superior Court Case No. CIV DS 2007038.

Expert witness declaration for the City of Redondo Beach, California, in *City of Redondo Beach vs State of California*, Los Angeles County Superior Court Case No. BS172218 litigation regarding the California Voter Participation Act.

Expert witness declaration, deposition and testimony in *Nairne v Ardoin*, United States District Court Middle District of Louisiana, Case No. 22-178-SDD-SDJ litigation under the Federal Voting Rights Act.

Expert witness declaration, deposition and testimony in *Common Cause Florida v Byrd*, Second Judicial Circuit In and for Leon County, Florida, Case No.: 4:22-cv-109-AW-MAF litigation alleging violation of state constitutional redistricting rules.

Expert witness declaration for Florida in *Black Voter Matters Capacity Building v Laurel M. Lee* litigation under the redistricting provisions of the Florida Constitution, Case No: 2022 CA 0666.

Expert witness declaration in *Jacksonville Branch of the NAACP et al v City of Jacksonville*, United States District Court Middle District of Florida Jacksonville Division, Case No.: 3:22-cv-493-MMH-LLL litigation under the Federal Voting Rights Act.

Expert witness deposition for *Robinson v State of Louisiana*, United States District Court for the Middle District of Louisiana, Civil Action No. 3:22-cv-00211-SDD-RLB litigation under the Federal Voting Rights Act.

Expert witness declaration for *League et al. v. Johnson*, United States District Court for the Eastern District of Michigan, Case No. 17-14148 litigation related to partisan gerrymandering.

Expert witness declaration for West Contra Costa Unified School District in *Ruiz-Lozito vs West Contra Costa Unified School District* litigation under the California Voting Rights Act, Contra Costa Superior Court Case Number C18-00570.

Expert witness declaration for City of Placentia in *Joseph Aguirre v City of Placentia,* litigation under the California Voting Rights Act, Orange County Superior Court Case Number 30-2018-00999734-CU-BC-NJC.

Expert witness declaration, deposition and testimony for Kern County, California, in *Luna v County of Kern* litigation under the Federal Voting Rights Act.

Expert witness declaration and testimony for North Carolina in *Covington v State of North Carolina* litigation under the Federal Voting Rights Act.

Expert witness declaration and testimony for North Carolina in *Common Cause v. Lewis*, a partisan gerrymandering case.

Expert witness declaration for City of Fullerton in *Jamarillo v City of Fullerton* litigation under the California Voting Rights Act.

Expert witness declaration for City of Whittier in *Diego v City of Whittier* litigation under the California Voting Rights Act.

Expert witness declaration and deposition for plaintiff in *Harris vs Arizona Independent Redistricting Commission* litigation.

Expert witness declaration and deposition for Santa Clarita Community College District in *Solis v Santa Clarita Community College District* litigation under the California Voting Rights Act.

Expert witness declaration, deposition and testimony for City of Highland in *Garrett v City of Highland* litigation under the California Voting Rights Act.

Expert witness declaration, deposition and testimony for City of Palmdale in *Jauregui et al vs City of Palmdale* and *Garrett v City of Highland* litigation under the California Voting Rights Act.

Testified as 30(b)(6) "Most Knowledgeable" witness for Arizona Independent Redistricting Commission in *Arizona Minority Coalition v Arizona Independent Redistricting Commission*, including seven days of direct testimony and cross-examination in the state court case. Also testified in the related federal court case.

Consulting expert (another NDC team member was the expert witness) to State Attorney Generals of Washington, Arizona, Illinois and Oregon in *State of Washington et al vs Donald Trump,* United States District Court for the Western District of Washington. Case No. Case 2:25-cv-00127. 14th Amendment case.

Consulting expert (another NDC team member was the expert witness) to State Attorney Generals of New Jersey, Massachusetts, and California, in *State of New Jersey et al vs Donald Trump,* United States District Court for the District of Massachusetts. Case No. Case 1:25-cv-10139. 14th Amendment case.

Consulting expert for the following jurisdictions on their California Voting Rights Act-related cases, including preparing analysis and assisting with witness and attorney preparation: Cities of Anaheim, Burbank, Compton, Huntington Beach, Modesto, Poway, Santa Clara, Santa Clarita, Santa Monica, and Whittier; Santa Clarita Community College District; and Tulare Health Care District.

Voting Rights Act and Racial Bloc Voting Analysis

Attorney-client privilege bars the listing of most of NDC's specific clients, but NDC has performed racial bloc voting analysis for clients of the following law firms (and for other jurisdictions):

Nielsen, Merksamer, Parrinello, Gross & Leoni: Compiled and analyzed data for over 120 different jurisdictions facing voting rights litigation;

Lozano, Smith: Performed analysis of racial bloc voting in 4 separate jurisdictions.

Richards, Watson & Gerson: Compiled and analyzed potential liability under California Voting Rights Act and California Voter Participation Rights Act for about a dozen cities.

Atkinson, Andelson, Loya, Ruud & Romo: Performed/performing on analysis of racial bloc voting in dozens of jurisdictions and California Voter Participation Rights Act liability analysis for multiple school districts.

Dooley, Herr & Peltzer: Performed racial bloc voting analysis of 7 elections in 4 different election years. Also advised attorneys on rebuttal of plaintiff's racial bloc voting analysis.

Districting and Redistricting Projects

Consultant to over 450 jurisdictions on over 600 districting and redistricting projects since 1991. Clients include states, counties, cities, school districts and special districts. A list of clients is on NDCresearch.com.

Exhibit C

620 Florida Street, Ste. 101
Baton Rouge, Louisiana 70801

225-382-0333
225-330-7297 (fax)
dannie@dpg3law.com

Updated on
July 2026

Dannie P. Garrett, III

Work Experience

1994 – 2011, 2012 - present - Dannie P. Garrett, III, Attorney at Law, LLC
Solo Law Practice / Single Member LLC

Private sole practitioner law office, concentrating in the areas of general civil litigation and governmental law. I have handled matters in over 20 parishes, as well as multiple Courts of Appeal, the Louisiana Supreme Court, and the US District Courts for the Middle, Eastern and Western Districts. Since Feb. of 2011 I have been in private practice with a focus on governmental law. I have also worked with Redistricting, LLC and Strategies Demographics, LLC, through which I have participated in the redistrict of a number of parishes, municipalities, and school boards in the 2010 and 2020 Census cycle. I also maintain a legislative and executive branch lobbying practice and redistricting consultant services, primarily through my single member **Louisiana Government Strategies, LLC**.

2011-2012 Butler, Snow, LLP
Senior Counsel
Practice focused on governmental law and governmental relations. Senior Counsel in the Baton Rouge office of the firm.

2002 - 2010 Police Jury Association of Louisiana
Association Counsel (2002 - 2004)
General Counsel (2004 – 2010)

Registered lobbyist on behalf of the Association. Represent the Association in litigation on behalf of member parishes. Draft amicus briefs on behalf of the Association in litigation involving individual member parishes. Provide technical assistance to member parishes and Parish Attorneys around the state. Provided workers' compensation litigation and settlement oversight to the Parish Government Risk Management Agency. Legislative Coordinator for the Association. Liaison to the Louisiana Parish Attorneys' Association.

1999-2001 Louisiana House of Representatives
Staff Attorney, House Committee on House and Governmental Affairs

Provided research and drafting of legislation for members of the Louisiana House of Representatives. Drafted over 100 pieces of legislation. Staff Attorney for the Louisiana Compensation Review Commission. Staff Attorney for the Louisiana NFL Stadium Advisory Commission. Drafted *A compilation of Statutory and Jurisprudential Exceptions to the Public Records Laws (R.S. 44:1, et seq)*. Drafted *A Guide to Open Meetings and Public Records as Applicable to the Louisiana NFL Stadium Advisory Commission.*

1994-1999 Louisiana Municipal Association
Defense Counsel (1994-1999)

Casualty and Workers' Compensation defense for the Louisiana Municipal Risk

Management Agency on behalf of municipal governments around the state. Tried cases in 19 different parishes and 3 Workers Compensation Districts around the state and handled matters that did not go to trial in several other parishes. Handled appellate matters in several Court of Appeal Circuits and the Louisiana Supreme Court

Staff Attorney (1997-1999)

Provided technical assistance to municipalities and city attorneys around the state in areas of governmental law. Liaison to the Louisiana City Attorneys' Association. Registered lobbyist on behalf of the Louisiana Municipal Association

1993-1994 Nelson A. Moak & Associates

Associate Attorney

Plaintiff personal injury and family practice. After a few months, I ran the office while Nelson Moak was out of state. Responsible for all aspects of a solo law practice.

Education

1992 Juris Doctorate, Paul M. Hebert Law Center, Louisiana State University, Baton Rouge

1989 B.A., Finance, Louisiana State University, Baton Rouge

1984 Episcopal High School, Baton Rouge

Scholarly Work

1996 - Present Continuing Legal Education

I have received over 70 hours of instructor credit for various continuing legal education presentations.

2001 Public Law Center, Tulane University

Guest Lecturer, 2001 International Legislative Drafting Institute

I presented a lecture on drafting open meetings and public records laws to a group of national legislators from around the world.

2001 Public Law Center, Tulane University

Guest Lecturer, Legislation and Administrative Advocacy Seminar

I presented a lecture on Louisiana's Open Meetings and Public Records Law to a joint group of Tulane and Loyola students.

2004 American Bar Association

Panelist, State and Local Government Law Spring Seminar

I participated as a panelist in a presentation on the interconnection between state governmental ethics laws, as applicable to governmental attorneys, and the Model Code of Professional Conduct.

2005-2008 National Association of Counties

Panelist on multiple presentations of “How to Run a Public Meeting Seminars” conducted by the National Association of County Civil Attorneys

2009-2013 Louisiana Law Institute

Member of the Committee for the Revision of Louisiana Revised Statutes Title 33 –

Local Government Law

2013 National Business Institute
Continuing Legal Education presentation on Louisiana Public Records Law.

2015 Louisiana State University – Adjunct Professor
Instructor for POLI 4020, Constitutional Law and the Supreme Court

2015 to 2019 Louisiana Legislature
Service on the Sales and Use Tax Streamlining and Modernization Commission

Personal

Born in Baton Rouge, Louisiana, December 27, 1965

Married to Julie Frank Garrett since October 15, 1988

Two adult sons, Davis and Griffin

Other

Member of Louisiana State Bar
Member of Bar of US District Court, Middle District of LA
Member of Bar of US District Court, Western District of LA
Member of Bar of US District Court, Eastern District of LA
Member of Bar of US 5th Circuit Court of Appeals
Member Louisiana Association of Lobbyists
National Association of County Civil Attorneys
2007-2008 President Elect and 2006-2007 Secretary – Treasurer
Certified by the Louisiana Board of Ethics as a Third-Party Ethics Trainer
2012 – Present
Certified Professionalism Speaker
2013 - Present

Related Experience

2021-22
Contracted with Strategic Demographics, LLC to assist over 20 local governing authorities, including school boards, parish governing authorities and municipal governing authorities in crafting and adopting reapportionment/redistricting plans following the 2020 federal decennial census.

2011
Contracted with Redistricting, LLC to assist over 30 local governing authorities, including school boards, parish governing authorities and municipal governing authorities in crafting and adopting reapportionment/redistricting plans following the 2010 federal decennial census.

WILLIAM M. BLAIR
9915 Waterford Court
Baton Rouge, LA 70810
C: (225) 806-2142

Education:

B.A.: 1991, Political Science, Louisiana State University, Baton Rouge, Louisiana.
Ph.D.: 2003, Political Science, Louisiana State University, Baton Rouge, Louisiana.

Current Positions:

Director of Demographic Services, Louisiana Senate & Louisiana House of Representatives

- Craft requested redistricting plans for jurisdictions under legislative authority
- Analyze redistricting plans for compliance with state and federal law
- Work on a variety of projects involving geographic, political and policy data
- Legislative and public data analysis and presentations
- Maintain geographic and map data for jurisdictions under legislative authority
- Legislative designee for state review and collection political geography and data
- Liaison for the Louisiana Secretary of State on review of political geography changes
- Review jurisdiction submissions for compliance with state statute
- Update baseline state political geography to align with state and federal election cycle
- Legislative Liaison to Census Bureau's Redistricting Data Program

Adjunct Professor, Political Science

- Teach a variety of junior/senior level political science courses at Louisiana State University
- Courses include: The American Presidency, Southern Politics, Misinformation, Media and Democracy, Contemporary Political Systems, Introduction to Public Policy, Legislative Process, and Political Participation.

Redistricting Consultant

- Create and maintain jurisdictional databases
- Make redistricting presentations to jurisdictions concerning state and federal law
- Hold individual and group meetings with jurisdiction members concerning redistricting plan development
- Craft plans for jurisdictions and individual members of those jurisdictions
- Draft ordinances for redistricting plans
- Submit redistricting plans to the US Department of Justice
- Maintain dialogue with US Department of Justice concerning jurisdiction preclearance
- Provide mapping and data services to jurisdictions concerning redistricting
- Provide expert testimony as needed as a qualified expert
- Racial Block Voting and Election Data Analysis

Clients: 2000 Cycle:

Allen Parish Police Jury
Allen Parish School Board
Beauregard Parish Police Jury
Beauregard Parish School Board
Catahoula Parish Police Jury
Catahoula Parish School Board
East Baton Rouge School Board
East Carroll Parish Police Jury
Iberville Parish School Board
LaSalle Parish Police Jury
LaSalle Parish School Board
New Orleans City Council
St. James Parish Police Jury
St. James Parish School Board
St. John Parish Police Jury
St. John Parish School Board
St. Tammany Parish School Board
Vernon Parish Police Jury
Vernon Parish School Board
Washington Parish School Board
West Baton Rouge School Board
City of Ville Platte
City of Morgan City
City of Covington
City of Hammond
Central Community School Board
City of Slidell
City of Gretna

Clients: 2010 Cycle:

Beauregard Parish Police Jury
Beauregard Parish School Board
Catahoula Parish Police Jury
Catahoula Parish School Board
City of Amite
City of Baker
City of Gretna
City of Hammond
City of Leesville
City of Plaquemine
City of Port Allen
East Baton Rouge School Board
East Carroll Parish Police Jury
Iberville Parish Council
LaSalle Parish Police Jury
LaSalle Parish School Board
Natchitoches School Board
New Orleans City Council
Tangipahoa Parish Council
Tangipahoa Parish School Board
St. Tammany Parish School Board
Vernon Parish Police Jury
Vernon Parish School Board
Winn Parish Police Jury
Winn Parish School Board

Clients: 2020 Cycle

Beauregard Parish Police Jury
Beauregard Parish School Board
LaSalle Parish Police Jury
LaSalle Parish School Board
Natchitoches School Board
Tangipahoa Parish Council
Tangipahoa Parish School Board
City of Hammond
City of Leesville
City of Plaquemine
City of DeRidder
Grant Parish Police Jury
Avoyelles School Board
Concordia Parish Police Jury
Lincoln Parish School Board
Plaquemines Parish School Board
City of Zachary
City of St. Gabriel
Iberville Parish Council
Iberville Parsh School Board
Catahoula Parish Police Jury
Catahoula Parish School Board
St. Tammany Parish School Board
St. Tammany Parish Council
Vernon Parish Police Jury
Vernon Parish School Board
Winn Parish Police Jury
Winn Parish School Board
City of Plaquemines
Grant Parish School Board
Concordia Parish School Board
Lincoln Parish Police Jury
Plaquemines Parish Council
City of Ruston
City of Vidalia