

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his official  
capacity as Chair of the House Standing Committee  
on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

---

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina Senate,  
et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**NAACP PLAINTIFFS' MEMORANDUM IN SUPPORT OF THE**  
**MOTION FOR PRELIMINARY INJUNCTION**

## TABLE OF CONTENTS

|                                                                                            |    |
|--------------------------------------------------------------------------------------------|----|
| TABLE OF CONTENTS.....                                                                     | I  |
| INTRODUCTION .....                                                                         | 1  |
| STATEMENT OF FACTS .....                                                                   | 2  |
| I.    Black Voters File Suit in this Court Challenging 2023 CD1 .....                      | 2  |
| II.   The General Assembly Swiftly Redraws CD1 to Punish Voters .....                      | 3  |
| III.  SB249 Inflicts Numerous Harms on Black Voters in and around CD1 .....                | 6  |
| QUESTIONS PRESENTED .....                                                                  | 8  |
| LEGAL STANDARD .....                                                                       | 8  |
| ARGUMENT .....                                                                             | 8  |
| I.    Plaintiffs are Likely to Succeed on the Merits.....                                  | 8  |
| A. Defendants’ Have Retaliated Against Voters In Violation of the First<br>Amendment. .... | 8  |
| B. Defendants have Violated Plaintiffs’ Right to Petition .....                            | 20 |
| II.   SB249 Will Cause Irreparable Harm. ....                                              | 23 |
| III.  The Equities and the Public Interest Favor Plaintiffs. ....                          | 24 |
| CONCLUSION .....                                                                           | 25 |

## INTRODUCTION

Last week, the North Carolina General Assembly (the “NCGA”) redrew the State’s congressional districts *again*. In a virtually unprecedented move, the NCGA engaged in mid-decade redistricting entirely on its own initiative. No new Census compelled it. No intervening court order prompted it. No legitimate state interest justified it. The NCGA targeted Congressional District 1 in the redistricting process for one reason alone: to punish the voters in North Carolina’s historic Black Belt, including Plaintiffs, who had challenged the previous districting plan in this Court and who exercised their political power to oppose the map-drawers’ preferred candidates and policies in 2024.

Senate Bill 249 (S.L. 2025-95) (“SB249”) targets the heart of the Black Belt—Congressional District 1 (“CD1”), already challenged in its prior configuration as intentionally discriminatory. SB249 exacerbates the already-demonstrated vote dilution in CD1 by massively reducing the district’s Black voting-age population and eviscerating North Carolina’s longstanding Black Belt district.

Plaintiffs seek a preliminary injunction on two grounds supported by Defendants’ own statements preceding and during the legislative process: retaliation in violation of the First Amendment and frustrating Plaintiffs’ right to petition the government for redress of grievances. SB249 is a paradigmatic act of retaliation, punishing Plaintiffs for their protected political expression, association, and petitioning activity, specifically their organizing, voting, and litigating in 2024. And by replacing the challenged 2023 map before this Court could rule in Plaintiffs’ pending case, the NCGA has attempted to subvert

judicial review altogether, inviting an endless loop of un-remediable injury in violation of the First Amendment right to petition.

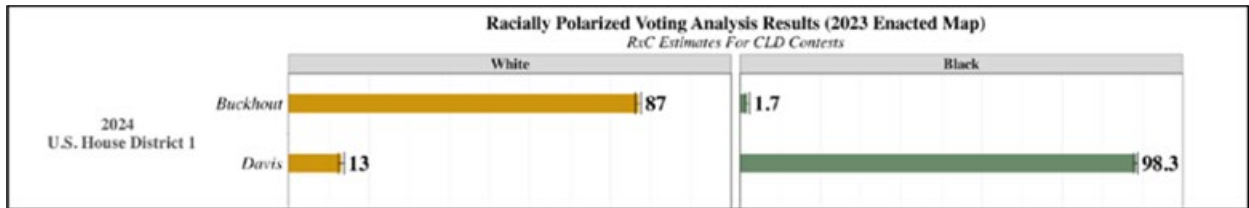
Because the Constitution does not permit the State to convert redistricting into a weapon of retaliation or a mechanism for evading federal judicial review, this Court should preliminarily enjoin SB249.

## **STATEMENT OF FACTS**

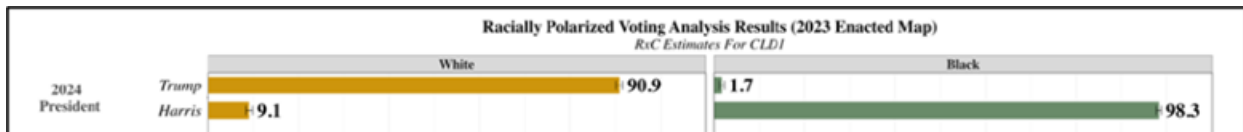
### **I. Black Voters File Suit in this Court Challenging 2023 CD1**

In 2023, the NCGA enacted a congressional plan that shifted the lines of CD1, diluting the voting power of Black voters in North Carolina’s historic Black Belt district by removing high Black Voting Age Population (“BVAP”) areas and replacing them with predominantly White counties. *See generally* Doc. 165 ¶¶219-41. Plaintiffs challenged this district, alleging intentional dilution in violation of Section 2 of the Voting Rights Act and intentional discrimination in violation of the Fourteenth and Fifteenth Amendments. Doc. 105 (Counts 7 and 9). In June and July 2025, this Court presided over a full trial on the merits.

As the trial record demonstrates, CD1 and northeastern North Carolina are characterized by extreme racially polarized voting. *E.g.*, Doc. 165 ¶¶273-85. These voting patterns reflect *racial*, and not merely partisan, divides. *See id.*; NAACPPX195 ¶¶4, 130-31. This extends to CD1 and the 2024 election in particular, as the expert analysis showed:



NAACPPX208 at Figure 9



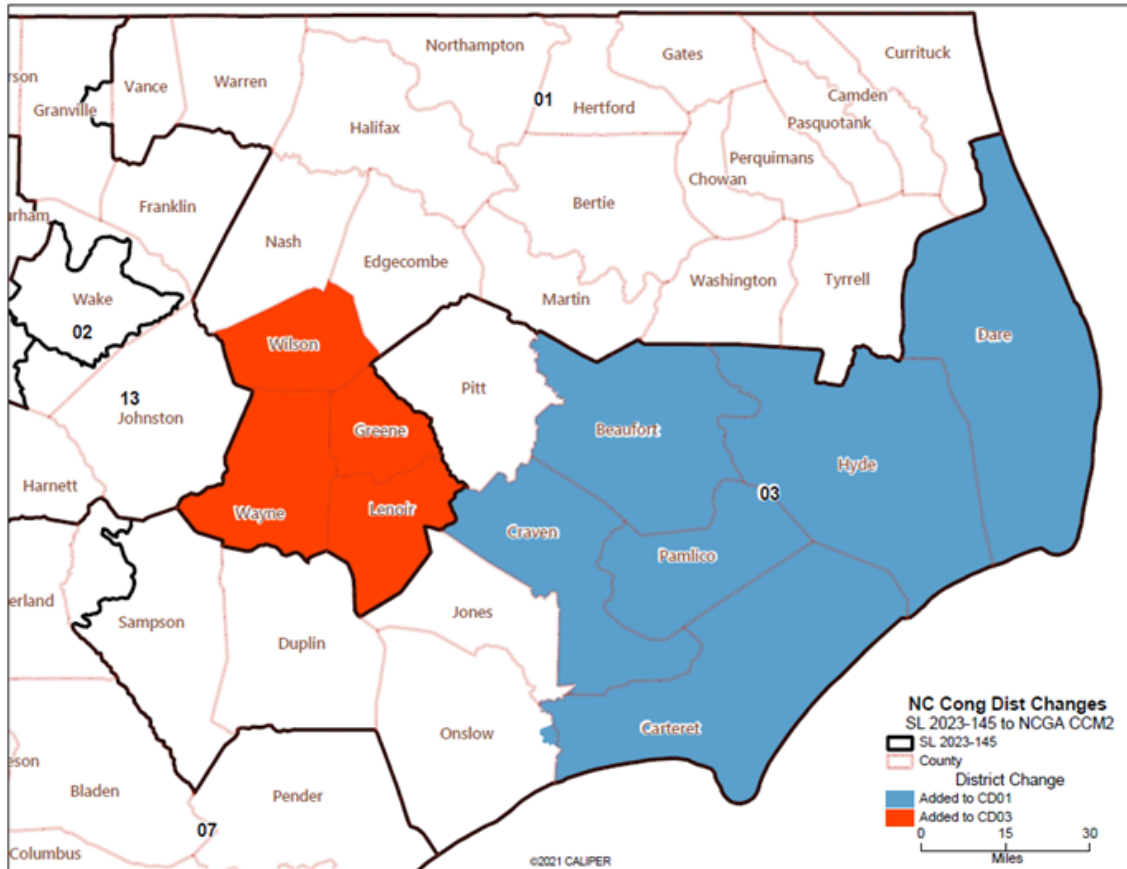
NAACPPX211 at Figure C-5

In post-trial briefing, Defendants argued no dilution was proven because CD1 “performed in 2024 for Democrats whom Plaintiffs identified as the Black-preferred candidates,” and that “Plaintiffs cannot credibly claim discriminatory effect where their candidates of choice prevailed,” and where “the BVAP of these districts did not meaningfully change between plans.” Doc. 164-1 ¶84.

## II. The General Assembly Swiftly Redraws CD1 to Punish Voters

On October 13, 2025, unprompted by any court order or new release of Census data, and while this Court’s trial ruling remained pending, Senator Phil Berger’s office announced the legislature would convene to consider new congressional maps. Exhibit 4, Klein Declaration (“Klein Ex.”). The release expressed an intent to draw an additional Republican seat and “safeguard[] Republican control of Congress” to “defeat” the efforts of “Democrats[ to] sue-until-blue.” *Id.*

On October 16, Senator Berger’s office announced the release of a draft congressional map, Klein Ex. 5, changing the configuration of CD1 and CD3 as shown below:



*Ex. A at Figure 1*

The Senate Committee on Elections scheduled a meeting for just four days later, October 20. Klein Ex. 6. The Committee listed the draft map as a proposed committee substitute for SB249, an unrelated campaign finance bill filed March 6, 2025, and first read on the Senate Floor on March 10. Klein Exs. 1-3, 7-8. There is no recent precedent for the NCGA’s using this maneuver for apportionment bills.<sup>1</sup>

In the October 20 Committee meeting, Senator Ralph Hise disclosed himself as the sole map-drawer and stated that “the motivation behind this redraw is simple and singular:

<sup>1</sup> See [ncleg.gov/redistricting](https://ncleg.gov/redistricting) (containing links to bill summaries indicating all filed versions of proposed plans post-2020 Census were originally filed as apportionment bills).

draw a new map that will bring an additional Republican seat to the North Carolina Congressional delegation,” Klein Ex. 10 at 4:00-4:15; *see also* Klein Ex. 9 (written plan criteria stating this goal). Senator Hise explained the proposed change “moves NC District 1 from a district where President Trump earned 51% of the vote in 2024 to 55% of the vote,” and accomplished this by “look[ing] at what the political outcome was of all the counties as well as the [Voting Tabulation Districts] in eastern North Carolina,” Klein Ex. 10 at 9:29-10:01, 19:55-20:45, and the 2024 presidential election in particular. *Id.* at 25:41-26:12.

While Senator Hise disavowed using racial data to draw specific lines, he conceded his “general knowledge of the demographics of this state” including that “District 1 has a higher minority population.” *Id.* at 44:30-45:46. Senator Hise also erroneously claimed Democrats had conducted mid-decade redistricting in a similar posture in 1967, *id.* at 53:49-54:10. In reality, that redistricting had been required by a court order. *See* Klein Ex. 20.

In Senate floor debate just hours later, all five proposed amendments to SB249 were either tabled or ruled out of order. *See generally* Klein Exs. 1, 11. Senator Berger moved to cut off debate, and the bill passed its second reading. Klein Ex. 11 at 2:21:07-2:32:12. A vote on the third reading was attempted but (following an objection) the Senate recessed until the next day. *Id.* at 2:27:45-2:42:02.

On October 21, another amendment was tabled, Klein Ex. 14, and the Senate voted to exclude a dissenting speech by Senator Garrett from the record, another unusual move. Klein Ex. 13 at 41:48-43:35. SB249 then passed the Senate and went to the House,

where it passed its first reading, received favorable reports from multiple committees, and was sent back to the full House for a floor vote, *all in one day*. Klein Exs. 1, 15, 16.

On October 22, the House debated SB249 for approximately an hour. Klein Ex. 17. SB249 then passed second and third readings and was adopted into law, just two days after its first consideration in a Senate Committee and less than a week after public disclosure. Klein Exs. 1, 18. In the few days between announcing the new plan and enacting it, the legislature received over 12,000 written public comments via an online portal indicating strong, near-unanimous opposition. Klein Ex. 21; Ex. J (J. Sailor Jones Decl.) ¶8. This level of opposition is consistent with recent polling indicating that supermajorities of North Carolinians across all political affiliations think voting districts in the State should fairly represent all communities and political viewpoints. Klein Ex. 27 at 8; Ex. J ¶13.

### **III. SB249 Inflicts Numerous Harms on Black Voters in and around CD1.**

CD1 has historically provided Black voters an opportunity to elect their candidate of choice and elected a Black representative since at least 1992. *See* Klein Ex. 22; NAACPPX 179 at 14, 65, 98 (Leloudis Rep.); NAACPPX 181 at 47 (Bagley Rep.); *see also* Exs. I (Maxwell Decl.) ¶7, J ¶6. But SB249 drastically decreases the BVAP of CD1 by 8%, causing a near-perfect division of BVAP between CD1 (32.34%) and CD3 (29.4%). Ex. A (Fairfax Rep. at Tables 1, 3).

SB249 thus dilutes the voting power of highly cohesive Black voting populations in this area, causing a “clear decline” in performance of Black-preferred candidates and, as indicated in the below table, making it highly unlikely that Black voters in either district

will have an opportunity to elect congressional candidates of choice. Ex. B (Oskooii Rep. ¶¶4-7).<sup>2</sup>

| Plan         | Racial Composition of Districts         |         | Success of Black-Preferred Candidates by Election Year |                       |                        |                       |                        |
|--------------|-----------------------------------------|---------|--------------------------------------------------------|-----------------------|------------------------|-----------------------|------------------------|
| 2025 Enacted | 2020 Census Voting Age Population (VAP) |         | 2024<br>(15 Elections)                                 | 2022<br>(7 Elections) | 2020<br>(20 Elections) | 2018<br>(4 Elections) | 2016<br>(18 Elections) |
| CLD          | % NH White                              | % Black | Win Rate                                               | Win Rate              | Win Rate               | Win Rate              | Win Rate               |
| 1            | 59.73%                                  | 32.34%  | 7%                                                     | 0%                    | 5%                     | 50%                   | 33%                    |
| 3            | 56.17%                                  | 29.40%  | 7%                                                     | 0%                    | 0%                     | 50%                   | 17%                    |

*Ex. B at Table 2*

Beyond electoral outcomes, these drastic changes to CD1 and CD3 will have other harmful consequences for voters, especially civically-engaged voters in the Black Belt like Plaintiffs. For example, Arthur Lee Johnson voted for Representative Davis in 2024 and has long conducted voter registration, education, and get-out-the-vote efforts in his community around congressional elections, including in Wilson County and neighboring Black Belt counties where he has deep ties and associations, like Edgecombe and Bertie (which, unlike Wilson County, will remain in CD1). *See* Ex. F (Johnson Decl.) ¶¶5-8, 12. Under SB249, Mr. Johnson has lost his status as a CD1 voter, will be unable to vote for or be represented by his preferred candidate, and will have to build new relationships for advocacy in CD3 from the “ground up.” *Id.* ¶¶13-16. When SB249 passed, he was working to set up a town hall with Congressman Davis. *Id.* ¶11. Those efforts are now on hold. *Id.*

Mr. Johnson is not alone. Other individual and organizational plaintiffs will suffer similarly. *See, e.g.,* Exs. E (Calvin Jones Decl.) ¶¶8-13 (Mr. Jones can no longer leverage

---

<sup>2</sup> These win rates are consistent with the results in the NCGA’s own “StatPacks” for SB249. Klein Ex. 21.

his full coalition of Black Belt farmers to advocate with his congressman; he has no connections in coastal counties added to CD1 and expects to be treated as a “telemarketer” reaching out to them); G (Sutton Decl.) ¶¶12-13 (Ms. Sutton’s connections to community advocates in CD1 are now “severed”), H (Patterson Decl.) ¶¶8-9 (Mr. Patterson removed from CD1 after building successful lobbying efforts in his district); I ¶¶9-10 (NAACP will have to start from scratch to build chapters in coastal counties further away from its office added to CD1).

### **QUESTIONS PRESENTED**

Should a preliminary injunction against SB249 be granted to maintain the status quo for the 2026 elections?

### **LEGAL STANDARD**

To obtain a preliminary injunction, Plaintiffs “must demonstrate that (1) they are likely to succeed on the merits; (2) they will likely suffer irreparable harm absent an injunction; (3) the balance of hardships weighs in their favor; and (4) the injunction is in the public interest.” *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 236 (4th Cir. 2014).

### **ARGUMENT**

#### **I. Plaintiffs are Likely to Succeed on the Merits.**

##### *A. Defendants’ Have Retaliated Against Voters In Violation of the First Amendment.*

Defendants initiated gratuitous mid-decade redistricting to retaliate against voters, including Plaintiffs, for voting a particular way, for associating with like-minded voters to

support candidates that would speak to common interests and values, and for petitioning their government against Defendants' redistricting initiatives.

Unlike the partisan gerrymandering disputes the Supreme Court has deemed nonjusticiable, this case concerns not *how* lines are drawn, but *whether* the decision to redraw the map was itself legitimate. While “a legislature may pursue partisan ends when it engages in redistricting,” *Alexander v. S.C. State Conf. of the NAACP*, 602 U.S. 1, 6 (2024), it may not engage in redistricting gratuitously to punish citizens for exercising their First Amendment rights. This case presents a novel set of facts requiring no assessment of degree or balance among redistricting considerations: the harm here was straightforward, admittedly intended, and undisputably accomplished. Because Defendants engaged in impermissible retaliation, Plaintiffs are likely to prevail on their First Amendment challenge.

1. Defendants Redrew the Congressional Map to Punish Voters for Exercising Their First Amendment Rights.

The First Amendment prohibits laws “abridging the freedom of speech” or “the right of the people . . . to petition the Government for a redress of grievances.” U.S. Const. amend. I. The government may not stop someone from exercising their First Amendment rights in advance, nor may it punish someone for exercising those rights “after the fact.” *Houston Cmty. Coll. Sys. v. Wilson*, 595 U.S. 468, 474 (2022).

To prevail on a First Amendment retaliation claim, Plaintiffs must establish “that (1) [they] engaged in protected activity, (2) the defendant took some action that adversely affected his constitutional rights, and (3) there was a causal relationship between his

protected activity and the defendant's conduct.” *Williams v. Mitchell*, 122 F.4th 85, 89 (4th Cir. 2024). Plaintiffs are likely to meet that test and prevail on the merits.

Protected Activity. Plaintiffs engaged in protected First Amendment activity by voting and organizing in 2024 and by filing this lawsuit. The First Amendment protects political expression, including support for, affiliation with, and voting in favor of one's chosen candidate. *See Elrod v. Burns*, 427 U.S. 347, 356 (1976) (plurality opinion) (“[P]olitical belief and association constitute the core of those activities protected by the First Amendment.”); *see also NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 460 (1958) (“[F]reedom to engage in association for the advancement of beliefs and ideas is an inseparable aspect of . . . freedom of speech.”). That expression includes “the freedom to join together in furtherance of common political beliefs.” *Cal. Democratic Party v. Jones*, 530 U.S. 567, 574 (2000) (quoting *Tashjian v. Republican Party of Conn.*, 479 U.S. 208, 214-15 (1986)); *see also Kusper v. Pontikes*, 414 U.S. 51, 56-57 (1973).

The First Amendment also safeguards the right “to petition the Government for a redress of grievances.” U.S. Const. amend. I. That right “extends to all departments of the Government” and thus includes “[t]he right of access to the courts,” such as by filing a lawsuit. *Cal. Motor Transp. Co. v. Trucking Unlimited*, 404 U.S. 508, 510 (1972) (citations omitted); *see also Borough of Duryea v. Guarnieri*, 564 U.S. 379, 397 (2011).

A majority of voters in CD1, including Plaintiffs Dawn Daly-Mack, Calvin Jones, Arthur Lee Johnson, Barbara Sutton, and Courtney Patterson, engaged in protected activity in 2024 when they voted for and joined in association with other voters (including an estimated 98.3% of Black voters) to elect a candidate of their choice for Congress affiliated

with the Democratic party. *See* Exs. C, E-H; NAACPPX208 at Fig. 9. The vast majority of these voters, including these Plaintiffs (and an estimated 98.3% of Black voters) also voted in favor of a 2024 presidential candidate of their choice affiliated with the Democratic party. *See* Exs. C, E-H; NAACPPX211 at Fig. C-5.

Plaintiffs also engaged in protected petitioning activity when they filed this lawsuit challenging the 2023 configuration of CD1 as an intentional attempt to dilute their votes and those of other Black voters.

Causal Relationship. Defendants chose to engage in redistricting to retaliate against Plaintiffs for their protected speech and litigation activity. To establish the requisite causation, Plaintiffs must demonstrate that their protected First Amendment activity “was a ‘substantial’ or ‘motivating’ factor in the defendant[s]’ decision to take action against [them],” in which case “the burden shifts to the defendant[s] . . . to show that [they] would have taken the same adverse action even in the absence of the protected [First Amendment activity].” *Gonzalez v. Trevino*, 602 U.S. 653, 662-63 (2024) (Alito, J., concurring) (quoting *Mt. Healthy City Bd. of Ed. v. Doyle*, 429 U.S. 274, 287 (1977)).

By their own account, and as noted above, the NCGA and Senator Hise redrew CD1 and CD3 in 2025 because of how Plaintiffs voted in 2024, i.e., their joining with others in their community to support Representative Davis and Kamala Harris, candidates disfavored by the NCGA and Senator Hise, rather than President Trump. Defendants once again targeted the Black Belt (as opposed to other, Whiter Democratic-voting areas of the state) to crack a cohesive population of voters because in 2024 they engaged in constitutionally protected activity by organizing and voting for their preferred candidates.

Senator Hise testified to using the 2024 presidential election results in redrawing district lines. Klein Ex. 10 at 25:41-26:12. The NCGA and Senator Hise, by their own account, gratuitously initiated the redistricting process mid-decade, to diminish (and effectively preclude) the ability of voters who engaged in disfavored speech to elect a Congressman. In addition, Plaintiffs were also targeted for exercising their right to petition by filing this lawsuit, which legislative leaders branded a “sue-until-blue” tactic and now seek to punish with even deeper vote dilution. Klein Ex. 4.

To achieve this purpose, they targeted high-BVAP counties. For example, 39.14% BVAP Wilson County, the home county of Plaintiff Arthur Lee Johnson, was carried by both Representative Davis and presidential candidate Harris, candidates affiliated with the NCGA-disfavored Democratic party. Ex. A (Fairfax at Table 5); Klein Ex. 23. And in 40.47% BVAP Lenoir County, the home of Plaintiffs Barbara Sutton and Courtney Patterson, Rep. Davis came within 120 votes of carrying the county. Ex. A (Fairfax at Table 5); Klein Exs. 23, 24. Both counties were moved out of CD1, with counties of much lower BVAP population and where voters expressed viewpoints favored by the map-drawers moved in. Ex. A (Fairfax Rep. at Fig. 1, Table 5); Ex. B (Oskooii Rep. At 3-4).

Defendants cannot establish that they would have initiated the map-drawing process in the absence of Plaintiffs’ First Amendment-protected activity. In other cases, the state legislators could point to some non-retaliatory reason for drawing new congressional maps. Those reasons may include (1) drawing a new map following the release of the Census (*e.g.*, *Gill v. Whitford*, 585 U.S. 48, 54-55 (2018)); (2) replacing a map that has been invalidated by a court (*e.g.*, *Rucho v. Common Cause*, 588 U.S. 684, 691 (2019)); or (3)

replacing a court-drawn map with a legislature-drawn map (*e.g.*, *LULAC v. Perry*, 548 U.S. 399, 412-13 (2006)). Here, though, Defendants cannot identify any valid, non-retaliatory reason to engage in the 2025 redistricting at all. They initiated the redistricting process *solely* to target voters in CD1, and punish them via line-drawing based upon voters' past political expression and litigation activity.

*Adverse Action.* Finally, Defendants' retaliation has "adversely affected [Plaintiffs'] constitutional rights." *Williams v. Mitchell*, 122 F.4th 85, 89 (4th Cir. 2024); *see also Houston Cmty. Coll. Sys.*, 595 U.S. at 477-78. Because "there is no justification for" punishing people for exercising their constitutional rights, the adverse effect "need not be great" to be actionable. *Bart v. Telford*, 677 F.2d 622, 625 (7th Cir. 1982) (Posner, J.) (cited approvingly in *Constantine v. Rectors & Visitors of George Mason Univ.*, 411 F.3d 474, 500 (4th Cir. 2005)). Indeed, "even minor retaliation" can support a retaliation claim so long as it has "a chilling effect on future expression." *Kirby v. City of Elizabeth*, 388 F.3d 440, 450 n.8 (4th Cir. 2004).

It does not matter whether Plaintiffs have any legal entitlement to the benefit Defendants stripped away. The First Amendment prohibits retaliation not only when government burdens rights to which a plaintiff is entitled, but also when it withdraws discretionary benefits as a tool to punish protected expression. *Rutan v. Republican Party of Ill.*, 497 U.S. 62, 72 (1990). The question is not whether the plaintiff has a right to the benefit; it is whether deprivation of the benefit will "chill the exercise of a constitutional right" such that "it would likely deter 'a person of ordinary firmness' from exercise in the future." *Mitchell*, 122 F.4th at 89-90 (quoting *Constantine*, 411 F.3d at 500). Thus, for

example, the government may not withhold unemployment benefits or tax exemptions to penalize protected activity—even though no one has a constitutional right to receive them in the first place. *See Sherbert v. Verner*, 374 U.S. 398, 404-05 (1963); *Speiser v. Randall*, 357 U.S. 513, 518 (1958).

Here, Defendants’ gratuitous decision to undertake mid-decade redistricting gives rise to at least four independent adverse actions, each of which has chilled—and will continue to chill—Plaintiffs from exercising their rights to speak, associate, and petition for fear of being retaliated against again.

*First*, Defendants removed Plaintiffs including Arthur Lee Johnson, Barbara Sutton, and Courtney Patterson from CD1 and reassigned them to CD3, severing the relationship with their current representative and threatening their right to vote for—and be represented by—their current congressional representative. *See* Exs. F-H; *see also* Ex. A (Fairfax Rep. ¶13).

Voters have a First Amendment interest in casting ballots for candidates they want to vote for. *See, e.g., Anderson v. Celebrezze*, 460 U.S. 780, 786-87 (1992); *see also Lubin v. Panish*, 415 U.S. 709, 716 (1974). And while Representative Davis has indicated he may run in either CD1 or CD3, *see* Klein Ex. 22, he will (regardless of which district) no longer appear on the ballot for thousands of his current constituents, including at least one individual Plaintiff here either still in—or moved out of—CD1. By depriving Plaintiffs of representation by their longtime member of Congress, Defendants signaled that disfavored speech or petitioning will be punished by separating Plaintiffs from their district and representative. That is impermissible retaliation.

*Second*, Defendants deprived Plaintiffs of the right to associate with neighboring voters and communities with whom they have longstanding ties and common political interests. An election is about more than just a candidate “attaining political office.” *Illinois Bd. of Elections v. Socialist Workers Party*, 440 U.S. 173, 186 (1979). It is “a means of disseminating ideas as well.” *Id.* That is why the First Amendment “promises Americans the right not just to proclaim a political vision but to join with their compatriots and actually advance that vision.” *6th Cong. Dist. Republican Comm. v. Alcorn*, 913 F.3d 393, 401 (4th Cir. 2019). That associational right “rank[s] among our most precious freedoms.” *Williams v. Rhodes*, 393 U.S. 23, 30 (1968). Democracy “is unimaginable without the ability of citizens to band together in promoting among the electorate candidates who espouse their political views.” *Jones*, 530 U.S. at 574.

Here, Plaintiffs have spent decades strengthening community ties and building political power to advance their interests at the ballot box, often in association with groups like Plaintiff North Carolina NAACP. Plaintiff Arthur Johnson has worked across the Black Belt to register voters and encourage them to vote in congressional elections. Ex. F ¶¶6-8. But SB249 altered CD1, removing Black Belt counties that have been part of the district for decades, and adding coastal communities that have not. *Compare* Klein Ex. 25 (SB249 Map), *with* Klein Ex. 26 (past congressional plans used in elections). Now in CD3, Mr. Johnson “ha[s] been removed from that network and community that [he] ha[s] spent years helping to build.” Ex. F ¶13.

Other Plaintiffs, like Barbara Sutton, will have to “travel further to get to counties in the southern part of CD 3” to engage in the same organizing work, which is a “significant

barrier to mobilizing members of Kinston Lenoir NAACP Chapter,” Ex. G. ¶14. The longer distance that Ms. Sutton will have to travel—and the additional time and energy the trips will entail—will chill her First Amendment rights. *See also*, Exs. H-J; *Rutan*, 497 U.S. at 73 (upholding retaliation claim of employees “denied transfers to workplaces reasonably close to their homes” in part because they “will feel a daily pressure from their long commutes”). Targeting Plaintiffs for their protected associational and civic activities—and forcing them to go to greater lengths to continue those activities—will chill the exercise of those rights in the future.

*Third*, by dismantling former CD1, Defendants have made it significantly harder for the highly cohesive community of Black voters (including Plaintiffs) in the Black Belt to again act collectively to actually elect candidates who represent their shared interests. *See* Ex. B ¶¶6-8; Ex. C (Daly-Mack Decl.) ¶11-12 (Ms. Daly-Mack expects that the changes to CD1 will result in CD1 being represented by someone like her current State Senator, Bobby Hanig, who is “not responsive to the needs of our community”); *see generally* Exs. E-F. In doing so, Defendants have “burden[ed] [Plaintiffs’] representational rights.” *Vieth v. Jubelirer*, 541 U.S. 267, 315 (2004) (Kennedy, J., concurring in the judgment).

Targeting Plaintiffs in this manner constitutes an adverse action regardless of whether Plaintiffs have a freestanding constitutional right to any particular representation or degree of partisan fairness. Removing these Plaintiffs from a congressional district in which they had some (albeit a diminished) ability to elect candidates of their choosing, and intentionally placing them into new districts where they will almost certainly be unable to do so in retaliation for their speech and petitioning activity, constitutes a First Amendment

retaliatory harm. Indeed, on the unique and egregious facts of this case, the harm here stems solely from this unlawful retaliatory motive in targeting CD1 in the first place: diluting voters' voices. This was sole motivation prompting redistricting—not the Census, or a court order, or some need to address traditional redistricting criteria (already accounted for in 2023 and not substantively improved here, *see* Ex. A (Fairfax Rep. ¶¶10-12)).

*Finally*, this adverse action by Defendants will chill Plaintiffs from petitioning for a redress of grievances. Plaintiff Common Cause may reconsider litigation challenging redistricting in the future because its leaders fear that further litigation may prompt the General Assembly to target its members, which runs contrary to its mission of empowering voters. *See* Ex. J ¶15.

2. Defendants Cannot Evade the First Amendment by Retaliating Through Redistricting.

Redistricting does not occur in a First Amendment-free zone.

The NCGA's authority to draw and redraw congressional maps comes from the federal Constitution's Elections Clause. U.S. Const. art. I, § 4; *see Arizona v. Inter Tribal Council of Ariz., Inc.*, 570 U.S. 1, 8-9 (2013). That authority is important but limited. It does not allow the NCGA "to dictate electoral outcomes, to favor or disfavor a class of candidates, or to evade important constitutional restraints." *Cook v. Gralike*, 531 U.S. 510, 523 (2001) (quoting *U.S. Term Limits, Inc. v. Thornton*, 514 U.S. 779, 833-34 (1995)).

*Cook* is instructive. There, Missouri altered its ballot design to single out congressional candidates who refused to support a proposed constitutional amendment imposing term limits. 531 U.S. at 514-15. Although "the precise damage the labels may

exact on candidates [was] disputed between the parties,” the Court nonetheless struck down the law. *Id.* at 525-26. The reason was categorical: the labeling scheme went beyond “regulating the procedural mechanisms of elections” and instead “place[d] [its] targets at a political disadvantage to unmarked candidates.” *Id.* at 525-26. As the Court explained, legitimate Elections Clause regulations concern only the procedural steps *necessary* to hold an election. *Id.* at 523-24.

The same is true of SB249. Regardless of “the precise damage [it] may exact on [Plaintiffs],” *Cook*, 531 U.S. at 525, the law does not regulate the procedural mechanisms necessary to conduct an election. Existing, legislatively drawn maps were already in place. The NCGA did not draw a new map to ensure that ““some sort of order, rather than chaos, [would] accompany the democratic process.”” *Id.* at 524 (quoting *Storer v. Brown*, 415 U.S. 724, 730 (1974)). It did so simply to retaliate against voters, including Plaintiffs, for speaking out, associating with like-minded neighbors, voting a certain way, and petitioning government in ways officials disfavored. As explained, that initial decision to redraw the map was itself illegitimate. *See supra* pp. 12-13.

The partisan gerrymandering line of cases is entirely different. Those cases concerned *how* lines were drawn in the context of an otherwise validly initiated map-drawing process. *See supra* p. 13 (collecting cases). In *LULAC*, for example, the Texas legislature replaced a court-drawn map consistent with the Supreme Court’s principle that “a lawful, legislatively enacted plan should be preferable to one drawn by the courts.” 548 U.S. at 412, 416. The legislature viewed the court-drawn map as “a vestige of a Democratic gerrymander.” Brief for Appellee at 32, *LULAC*, 548 U.S. 399 (2006) (Nos. 05-204, 05-

254, 05-276, 05-439), 2006 WL 284225. The Court concluded that “there is nothing inherently suspect about a legislature’s decision to replace mid-decade a court-ordered plan with one of its own.” *LULAC*, 548 U.S. at 418-19.

Because the decision to draw a new map in those cases was itself valid, the plaintiffs’ challenges focused on *how* the lines were drawn, parsing out partisanship from other redistricting factors. Such claims necessarily implicate a question of “degree: How to ‘provid[e] a standard for deciding how much partisan dominance is too much.’” *Rucho*, 588 U.S. at 704 (quoting *LULAC*, 548 U.S. at 420). Such standardless inquiries are “beyond the reach of the federal courts.” *Id.* at 718.

This case is different. Plaintiffs do not bring a partisan gerrymandering claim. They do not suggest “that groups with a certain level of political support should enjoy a commensurate level of political power and influence.” *Rucho*, 588 U.S. at 704. And they do not seek a remedy that would force this Court or the NCGA “to rearrange the challenged districts to achieve that end.” *Id.* at 705.

Rather, this Court can resolve this claim by applying straightforward First Amendment retaliation principles. Just like with any other official government action, the Constitution forbids the government from redrawing electoral district lines in order “to punish or suppress speech,” *Nat’l Rifle Ass’n of Am. v. Vullo*, 602 U.S. 175, 198 (2024), or other protected First Amendment activity. No complex metrics or subjective assessments of “partisanship” are required to enjoin unconstitutional government action under such circumstances, especially where any Court injunction would simply revert the map to the

preexisting, legislatively drawn status quo (namely, the 2023 Congressional Plan). SB249 should thus be enjoined.

*B. Defendants have Violated Plaintiffs' Right to Petition*

Defendants' decision to redraw the map to stall and block resolution of Plaintiffs' 2023 redistricting challenge is also a standalone violation of the First Amendment's Petition Clause. The First Amendment right to petition encompasses the "right of access to the courts" to file a lawsuit challenging violations of federal law. *E.g., Cal. Motor Transp.*, 404 U.S. at 510. And the right to petition for judicial redress is protected "whenever it is genuine, not simply when it triumphs." *BE & K Construction Co. v. NLRB*, 536 U.S. 516, 532 (2002).

The right to petition works hand-in-hand with other First Amendment rights. Courts have long recognized that litigation is "a vehicle for effective political expression and association," and a means to "facilitate the informed public participation that is a cornerstone of democratic society." *Borough of Duryea*, 564 U.S. at 397 (quoting *In re Primus*, 436 U.S. 412, 431 (1978)). In the civil-rights era, that role could not have been clearer: litigation served as the channel through which "the distinctive contribution of a minority group" could shape the Nation's ideas and ideals. *Id.* (citing *NAACP v. Button*, 371 U.S. 415, 431 (1963)). And the petition right does not turn on outcome. "[E]ven unsuccessful but reasonably based suits advance" First Amendment interests—both by testing and refining legal principles and by reinforcing the legitimacy of the judicial process itself. *BE & K Construction*, 536 U.S. at 532.

At its core, the right to petition safeguards the ability of individuals to seek—and, when warranted, to secure—judicial relief “by direct appeal to government officials charged with applying the law.” *Borough of Duryea*, 564 U.S. at 397. Interpreting the Petition Clause requires fidelity to “the objectives and aspirations that underlie the right.” *Id.* at 388. It thus protects not only the right to file a case, but also to litigate one’s case (within the bounds of professional norms and the applicable procedural rules). *Cf. Bill Johnson’s Rests. v. NLRB*, 461 U.S. 731, 743-44 (1983). And that protection reaches all the way to a remedy. *Cf. Trump v. CASA, Inc.*, 606 U.S. 831, 851-52 (2025) (“[T]he complete-relief principle has deep roots in equity[.]”). Government actors thus may not attempt to stymie the right to petition by strategically mooted out or injecting new facts into litigation in order to prevent judicial resolution and redress. *Cf. Ne. Fla. Chapter of Associated Gen. Contractors of Am. v. City of Jacksonville*, 508 U.S. 656, 661-62 (1993).

The risk of these types of Petitions Clause violations is especially acute in the redistricting context, where “[p]ractical considerations sometimes require courts to allow elections to proceed despite pending legal challenges.” *Riley v. Kennedy*, 553 U.S. 406, 426 (2008). If a map is deemed unlawful too near an election, “the only reasonable option may be to use the plan one last time.” *Abbott v. Perez*, 585 U.S. 579, 602 (2018). The ability of government defendants to try to delay or otherwise avoid redress even where a map is illegal makes redistricting cases a particularly tempting target for Petition Clause violations—such as where a legislature upends the status quo by passing a new map weeks before the candidate filing deadline.

Given these dynamics, the Supreme Court has rejected efforts to frustrate judicial review in redistricting cases. *E.g.*, *North Carolina v. Covington*, 585 U.S. 969 (2018). Were it otherwise, legislatures could “put[] redistricting litigation in an infinity loop[,]” enacting different plans *ad nauseum* whenever an election was impending and thereby extending the litigation and preventing Plaintiffs from ever obtaining a remedy. *Singleton v. Allen*, 690 F. Supp. 3d 1226, 1292-93 (N.D. Ala. 2023). That tactic “is inconsistent with the Article III judicial power because it allows the State to constrain (indeed, to manipulate) the Court’s authority to grant equitable relief.” *Id.* at 1292. It would create “an endless paradox that only [the State] can break, thereby depriving Plaintiffs of the ability to effectively challenge and the courts of the ability to remedy.” *Id.*; *cf. Already, LLC v. Nike, Inc.*, 568 U.S. 85, 91 (2013) (rejecting mootness argument where “a defendant could engage in unlawful conduct, stop when sued to have the case declared moot, then pick up where he left off, repeating this cycle until he achieves all his unlawful ends.”)

That is happening here, now. With a fully tried challenge to CD1 still *sub judice*, the General Assembly waited until weeks before the December 1 candidate-filing deadline, and then hastily redrew CDs 1 and 3—asserting unlimited power to revise the lines again and again. A process in which Plaintiffs can never obtain a final adjudication of their claims (regardless of the preliminary relief this Court may grant) “produce[s] an illegal result, *viz.*, effectively barring respondents from access to the agencies and courts.” *Cal. Motor Transp. Co.*, 404 U.S. at 513. It also risks a *de facto* superiority of state law each election, in violation of the Constitution’s unambiguous proclamation that the “Constitution” and “Laws of the United States . . . shall be the supreme Law of the Land.” U.S. const., art. VI,

cl. 2. If the General Assembly can forever redraw maps mid-litigation to evade final judgment, then the infinity loop will become a reality—and Plaintiffs’ right “to pursue desired ends by direct appeal to government officials charged with applying the law” will be rendered a dead letter. *Borough of Duryea*, 564 U.S. at 397.

## **II. SB249 Will Cause Irreparable Harm.**

Unless enjoined, SB249 will cause Plaintiffs and other Black voters in North Carolina’s historic Black Belt irreparable harm. “Courts routinely deem restrictions on fundamental voting rights irreparable injury” because “once the election occurs, there can be no do-over and no redress.” *League*, 769 F.3d at 247. Monetary damages are also “inadequate to compensate . . . voters for the loss of their fundamental right to vote.” *Griffin v. N.C. State Bd. of Elections*, 781 F. Supp. 3d 411, 453 (E.D.N.C. 2025). Similarly, injuries to First Amendment rights such as the right to speech, expression, association, and petition “unquestionably represent irreparable harm.” *Stuart v. Huff*, 834 F. Supp. 2d 424, 427-28 (M.D.N.C. 2011); accord *Griffin*, 781 F. Supp. 3d at 453; see also *Elrod*, 427 U.S. at 373 (plurality opinion) (“The loss of First Amendment freedoms . . . unquestionably constitutes irreparable injury.”); *Leaders of a Beautiful Struggle v. Baltimore Police Dep’t*, 2 F.4th 330, 346 (4th Cir. 2021).

Here, Plaintiffs are likely to succeed in establishing these harms as to SB249: Their right to petition has been thwarted, and they have been retaliated against in violation of their First Amendment rights.

### III. The Equities and the Public Interest Favor Plaintiffs.

The balance of equities and public interest—which merge when the government is the opposing party, *Nken v. Holder*, 556 U.S. 418, 435 (2009)—weigh in favor of an injunction. “Depriving voters of a fundamental right would result in significant hardship.” *Griffin*, 781 F. Supp. 3d at 454; *accord Disability Rts. N.C. v. N.C. State Bd. of Elections*, No. 5:21-cv-361, 2022 WL 2678884, at \*7 (E.D.N.C. July 11, 2022) (“The public interest is served by protecting federally guaranteed voting rights in North Carolina.”).

No countervailing government interest alters that traditional calculus. If SB249 is enjoined, the status quo will fall back to a congressional plan that the NCGA enacted only two years ago.<sup>3</sup> *See, e.g., Centro Tepeyac v. Montgomery Cnty.*, 722 F.3d 184, 191 (4th Cir. 2013) (“[A] state is in no way harmed by issuance of a preliminary injunction which prevents the state from enforcing restrictions likely to be found unconstitutional.”); *Griffin*, 781 F. Supp. 3d at 454 (“Preventing the State . . . from implementing a process violative of constitutional rights would impose no hardship.”). Nor does the election timeline move the needle. It does not matter that there may be “little time” before the qualifying deadlines for the 2026 election cycle begin, because here complying with an injunction of SB249 would mean simply “resurrect[ing]” the 2023 Congressional Plan for CD1 and CD3. *League*, 769 F.3d at 248.

---

<sup>3</sup> Plaintiffs maintain their challenge to the 2023 Congressional Plans, and the request for a permanent injunction following trial.

## CONCLUSION

For the reasons set forth above, Plaintiffs' motion should be granted and SB249 preliminarily enjoined.

Dated: October 31, 2025

Respectfully submitted,

/s/ Hilary Harris Klein

Hilary Harris Klein

### HOGAN LOVELLS US LLP

J. Tom Boer\*  
Olivia Molodanof\*  
Madeleine Bech\*  
4 Embarcadero Center, Suite 3500  
San Francisco, CA 94111  
Telephone: 415-374-2300  
Facsimile: 415-374-2499  
tom.boer@hoganlovells.com  
olivia.molodanof@hoganlovells.com  
madeleine.bech@hoganlovells.com

Jessica L. Ellsworth\*  
Misty Howell\*  
Odunayo Durojaye\*  
555 Thirteenth Street, NW  
Washington, DC 20004  
Telephone: 202-637-5600  
Facsimile: 202-637-5910  
jessica.ellsworth@hoganlovells.com  
misty.howell@hoganlovells.com  
odunayo.durojaye@hoganlovells.com

### ACLU OF NORTH CAROLINA LEGAL FOUNDATION

Jaclyn Maffetore (State Bar #50849)  
Kristi L. Graunke (State Bar #51216)  
P. O. Box 28004  
Raleigh, NC 27611  
Telephone: (919) 354-5070

### SOUTHERN COALITION FOR SOCIAL JUSTICE

Jeffrey Loperfido (State Bar #52939)  
Hilary Harris Klein (State Bar #53711)  
Christopher Shenton (State Bar #60442)  
Mitchell D. Brown (State Bar #56122)  
Lily Talerman (State Bar #61131)  
5517 Durham Chapel Hill Blvd.  
Durham, NC 27707  
Telephone: 919-794-4213  
Facsimile: 919-908-1525  
hilaryhklein@scsj.org  
jeffloperfido@scsj.org  
chrisshenton@scsj.org  
mitchellbrown@scsj.org  
lily@scsj.org

### ACLU FOUNDATION

Ari J. Savitzky\*\*  
Ethan Herenstein\*\*  
Clayton Pierce\*\*  
Sophia Lin Lakin\*\*  
125 Broad Street, 18th Floor  
New York, New York 10004  
Telephone: (212) 549-2500  
asavitzky@aclu.org  
eherenstein@aclu.org  
cpierce@aclu.org  
slakin@aclu.org

jmaffetore@acluofnc.org  
kgraunke@acluofnc.org

*\*\*Applications to appear specially  
forthcoming*

### **WORD CERTIFICATION**

Pursuant to Local Rule 7.3(d)(1), the undersigned certifies that the word count for Memorandum in Support of Motion for Preliminary Injunction is 6230 words. The word count excludes the case caption, signature lines, cover page, and required certificates of counsel. In making this certification, the undersigned has relied upon the word count of Microsoft Word, which was used to prepare the brief.

/s/ Hilary Harris Klein  
Hilary Harris Klein

### **CERTIFICATE OF SERVICE**

I certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Hilary Harris Klein  
Hilary Harris Klein

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

---

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**INDEX OF EXHIBITS TO NAACP PLAINTIFFS’  
MOTION FOR PRELIMINARY INJUNCTION**

|           |                                                                                                |
|-----------|------------------------------------------------------------------------------------------------|
| EXHIBIT A | 2025 Supplemental Expert Report of Anthony E. Fairfax                                          |
| EXHIBIT B | 2025 Supplemental Expert Report of Dr. Kassra Oskooii                                          |
| EXHIBIT C | Declaration of Reverend Dawn Daly-Mack                                                         |
| EXHIBIT D | Declaration of Syene Jasmin                                                                    |
| EXHIBIT E | Declaration of Calvin Jones                                                                    |
| EXHIBIT F | Declaration of Arthur Lee Johnson                                                              |
| EXHIBIT G | Declaration of Barbara Jean Sutton                                                             |
| EXHIBIT H | Declaration of Courtney Patterson                                                              |
| EXHIBIT I | Fourth Declaration of Deborah Dicks Maxwell                                                    |
| EXHIBIT J | Declaration of Sailor Jones                                                                    |
| EXHIBIT K | Attorney Declaration of Hilary Harris Klein (filed separately with Klein Documentary Exhibits) |

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

---

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**EXPERT REPORT OF ANTHONY E. FAIRFAX**

**On the 2025 Congressional Districts for the State of North Carolina**

---

October 31, 2025

1. I have been retained by counsel representing the Plaintiffs in this lawsuit to analyze and compare the changes made in North Carolina's congressional districts from the 2023 enacted plan (S.L. 2023-145) by Senate Bill 249 (S.L. 2025-95).
2. I have provided several expert reports in this matter that I understand were admitted as evidence at trial, including an October 2024 Corrected Expert Report and appendices (NAACPPX 182-88), October 2024 Reply Report (NAACPPX 200), and March 2025 Supplemental Rebuttal Report (NAACPPX 216).
3. My qualifications are outlined in my prior expert reports submitted in this matter. *See* NAACPPX 182 ¶¶ 2-9. An updated version of my Resume is provided as Appendix E to this Supplemental Report.
4. To perform the analysis in this matter, I used the same Maptitude for Redistricting software that I utilized in my prior reports. *See* NAACPPX 182 ¶ 10. I utilized the following datasets for my analysis:
  - a. Block Equivalency Files for the 2023 (SL 2023-145) North Carolina Congressional plan and for the 2025 plan resulting from modifications made in Senate Bill 249 (SL 2025-95) were downloaded from the North Carolina redistricting website.<sup>1</sup>
  - b. The 2020 Census data for the total and voting age population ("VAP") were obtained from Caliper Corporation's datasets for the state of North Carolina.<sup>2</sup>
5. I utilized the same analytical methods as applied in my prior reports. *See* NAACPPX 182 ¶¶ 13-25. Specifically, after gathering relevant datasets, I did the following:
  - a. In order to generate the comparison map, using Maptitude, the block equivalency files for the 2023 and 2025 district boundaries were joined with the census block geography. Once joined, the census blocks that changed districts from the 2023 to the 2025 plan were indicated in a new field using the district number to which they changed. Maptitude's merged layer function was deployed to generate only the parts of the districts that had changed. Finally, a color thematic map was created using the newly merged layer, showing only the two areas altered in red and blue (see Figure 1).

---

<sup>1</sup> <https://www.ncleg.gov/BillLookup/2023/S757> (2023 Congressional Plan); <https://www.ncleg.gov/BillLookup/2025/S249> (S.L. 2025-95).

<sup>2</sup> Caliper Corporation provides 2020 Census Data (PL94-171 data) in a format readable for their software, Maptitude for Redistricting. The population data are identical to the data provided by the Census Bureau.

- b. As in my prior reports, I used the category of “Any Part” Black<sup>3</sup> throughout parts of this report for Black Total and Voting Age Populations. *See* NAACPPX 182 ¶ 15.
6. Changes made by Senate Bill 249 (SL 2025-95). Using Maptitude, I identified the areas added and removed from Congressional Districts 1 and 3 (CD 1 & CD 3) by Senate Bill 249, and confirmed no changes were made to any other districts. Figure 1 below shows the areas added to and removed from Congressional Districts 1 and 3. The blue color represents the area added to CD 1, while the red area depicts the area removed from CD 1.

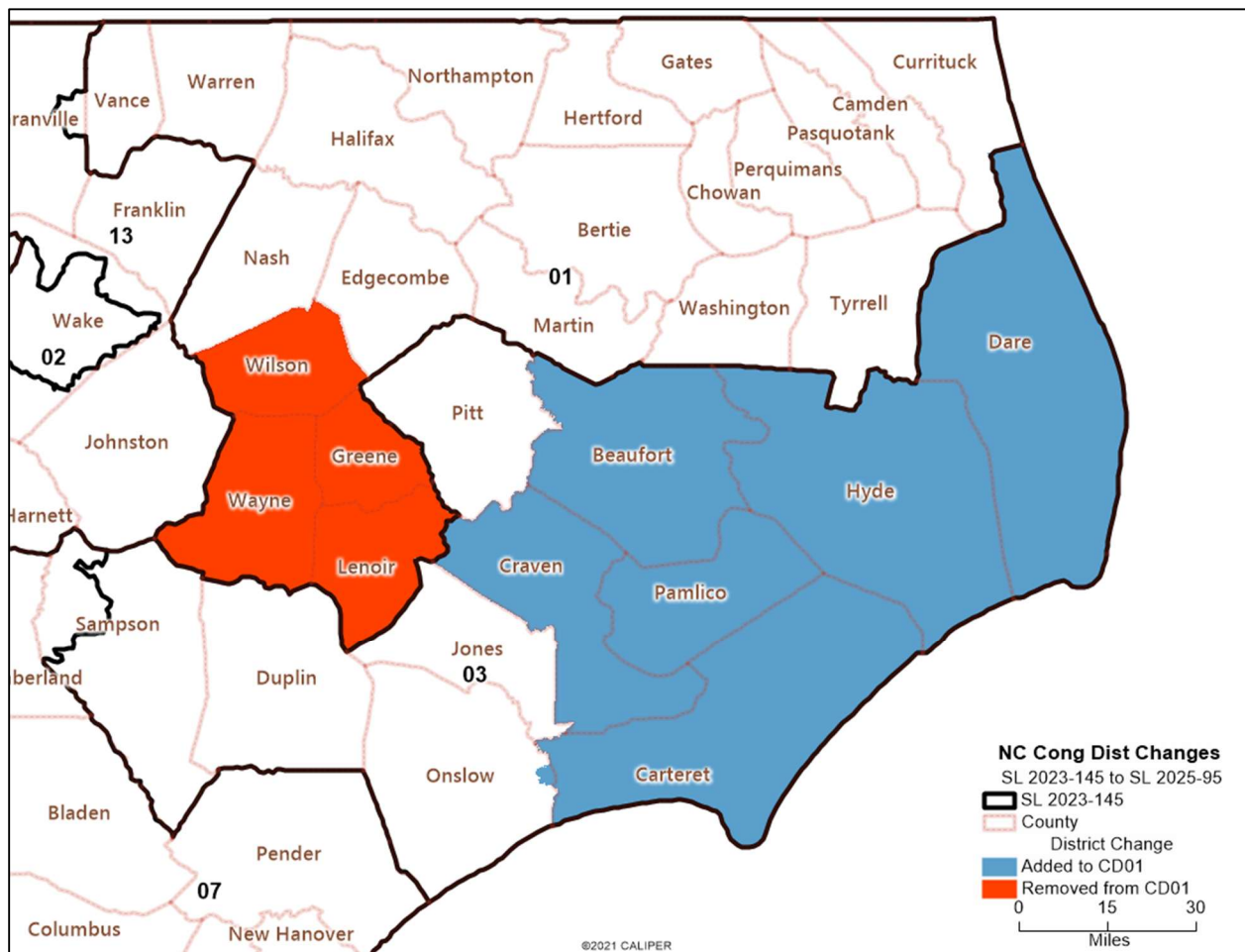


Figure 1 – NC CD1 Changes from 2023 to 2025

<sup>3</sup> The “Any Part” or “All Parts” Black includes surveyed persons who select Black Alone and Black and in combination with any race. Also, included within “Any Parts” Black are Hispanic Black persons as well.

7. Demographic Profile of Congressional Districts 1 and 3 in the 2023 and 2025 configurations: I analyzed the major racial demographics of CD 1 and CD 3 in the 2023 and 2025 configurations. These are outlined in the tables below:

**Table 1 - Racial Demographics North Carolina's 2023 CD 1**

| <b>TTLPop</b> | <b>White</b> | <b>% White</b> | <b>APBlack</b> | <b>% APBlack</b> |
|---------------|--------------|----------------|----------------|------------------|
| 745,670       | 358,722      | 48.11%         | 309,743        | 41.54%           |
| <b>VAP</b>    | <b>WVAP</b>  | <b>% WVAP</b>  | <b>ABBVAP</b>  | <b>% APBVAP</b>  |
| 587,318       | 297,776      | 50.70%         | 237,420        | 40.42%           |

Source: U.S. Census Bureau 2020 Census Data.

**Table 2 - Racial Demographics North Carolina's 2023 CD 3**

| <b>TTLPop</b> | <b>White</b> | <b>% White</b> | <b>APBlack</b> | <b>% APBlack</b> |
|---------------|--------------|----------------|----------------|------------------|
| 745,671       | 463,854      | 62.21%         | 169,697        | 22.76%           |
| <b>VAP</b>    | <b>WVAP</b>  | <b>% WVAP</b>  | <b>ABBVAP</b>  | <b>% APBVAP</b>  |
| 586,125       | 382,633      | 65.28%         | 125,120        | 21.35%           |

Source: U.S. Census Bureau 2020 Census Data.

**Table 3 - Racial Demographics North Carolina's 2025 CD 1**

| <b>TTLPop</b> | <b>White</b> | <b>% White</b> | <b>APBlack</b> | <b>% APBlack</b> |
|---------------|--------------|----------------|----------------|------------------|
| 745,671       | 426,065      | 57.14%         | 251,298        | 33.70%           |
| <b>VAP</b>    | <b>WVAP</b>  | <b>% WVAP</b>  | <b>ABBVAP</b>  | <b>% APBVAP</b>  |
| 596,783       | 356,476      | 59.73%         | 192,997        | 32.34%           |

Source: U.S. Census Bureau 2020 Census Data.

**Table 4 - Racial Demographics North Carolina's 2025 CD 3**

| <b>TTLPop</b> | <b>White</b> | <b>% White</b> | <b>APBlack</b> | <b>% APBlack</b> |
|---------------|--------------|----------------|----------------|------------------|
| 745,670       | 396,511      | 53.18%         | 228,142        | 30.60%           |
| <b>VAP</b>    | <b>WVAP</b>  | <b>% WVAP</b>  | <b>ABBVAP</b>  | <b>% APBVAP</b>  |
| 576,660       | 323,933      | 56.17%         | 169,543        | 29.40%           |

Source: U.S. Census Bureau 2020 Census Data.

8. The demographic changes resulting from Senate Bill 249 were accomplished by removing counties with relatively high Black Voting Age Population (APBVAP) from Congressional District 1 (as low as 31.83% APBVAP) and adding, in their place, counties with relatively low Black Voting Age Population (as low as 2.32% APBVAP). Below is a table of the APBVAP% for counties added and removed from Congressional District 1. Appendix D includes a complete list of the APBVAP% for all counties in North Carolina.

**Table 5 - %APBVAP Counties Added to and Removed from CD-1**

| Counties removed from 2025 CD-1 |         | Counties added to 2025 CD-1 |         |
|---------------------------------|---------|-----------------------------|---------|
| County                          | %APBVAP | County                      | %APBVAP |
| Wayne                           | 31.83%  | Dare                        | 2.32%   |
| Greene                          | 37.28%  | Onslow (partial)*           | 4.47%   |
| Wilson                          | 39.14%  | Carteret                    | 5.40%   |
| Lenoir                          | 40.47%  | Pamlico                     | 18.10%  |
|                                 |         | Craven                      | 20.88%  |
|                                 |         | Beaufort                    | 23.01%  |
|                                 |         | Hyde                        | 28.35%  |

Source: U.S. Census Bureau 2020 Census Data.

\*This tables include the %APBVAP for the areas of Onslow included in 2025 CD-1.

9. Additional Traditional Redistricting Criteria. I was asked to analyze additional metrics of the 2025 Congressional Districts 1 and 3 relevant to those factors listed on the “2025 Congressional Plan Criteria,” sourced from the North Carolina General Assembly’s website at <https://webservices.ncleg.gov/ViewDocSiteFile/101156>.<sup>4</sup> These include Equal Population for the purposes of one-person, one-vote requirements, Compactness, Contiguity, and Respect for Existing Political Subdivisions, including counties, VTDs, and municipal boundaries.
10. I compared the 2025 Congressional Plan Criteria with those used in 2023 (and I understand admitted as JX038 at trial). I note the following substantive differences in criteria:
- a. The 2025 criteria adds the following language to the criterion addressing “Political Considerations”: *“The principal legislative objective in the 2025 Congressional Plan is to increase the Republican vote share of Congressional District 1 to outperform the same district in the 2023 Congressional plan codified as Senate Bill 757 on October 25, 2023. In doing so, only the boundaries of Congressional District 1 and Congressional 3 will be altered.”*<sup>5</sup>
  - b. The 2025 criteria added a criterion that “The 2025 Congressional Plan will comply with all applicable federal law.”
  - c. The 2025 omits the 2023 criterion regarding “Incumbent Residence” and states that it “may be considered in the formation of Congressional districts.”

<sup>4</sup> I understand from counsel this document was included as Klein Ex. 9 in support of their Motion for a Preliminary Injunction.

<sup>5</sup> I understand from counsel that this criterion, and specifically a performance analysis, was conducted by Dr. Kassra Oskooii, and so I have not addressed it here.

- d. The 2025 criteria addressing “Equal Population,” “Traditional Districting Principles,” “Compactness,” “Contiguity,” and “Respect for Existing Political Subdivisions” are the same as in 2023. The 2025 criterion addressing “Racial Data” appears substantively the same as in 2023, adding in additional court case citations.

11. The tables below summarize this information, and I have included the underlying Maptitude reports as Appendices C (2023 and 2025 districts).

- a. Equal Population. Point III of the 2025 Congressional Plan Criteria provides:

*Equal Population. The Committee chairs will use the 2020 federal decennial census data as the sole basis of population for the establishment of districts in the 2025 Congressional Plan. The number of persons in each congressional district shall be equal as nearly as is practicable, as determined under the most recent federal decennial census. Wesberry v. Sanders, 376 U.S. 1 (1964).*

Accordingly, below I have included the total population and deviation<sup>6</sup> figures from the 2020 decennial census, as shown in the field below:

**Table 6 – NC CD-1 and CD-3, 2023 & 2025 Population & Deviation**

| District  | Total Population | Deviation |
|-----------|------------------|-----------|
| 2023 CD-1 | 745,670          | -1        |
| 2025 CD-1 | 745,671          | 0         |
| 2023 CD-3 | 745,671          | 0         |
| 2025 CD-3 | 745,670          | -1        |

Source: U.S. Census Bureau 2020 Census Data

- b. Both of the 2025 districts differ by 1 person from their 2023 configurations in total population (see Appendix B & C). All districts meet the criteria of strict equality required for congressional districts.

---

<sup>6</sup> The 2020 ideal population size for congressional districts for North Carolina is 745,671.

- c. Compactness. Point VI of the 2025 Congressional Plan Criteria provides:

*Compactness. The Committee chairs shall make reasonable efforts to draw districts in the 2025 Congressional Plan that are compact.*

Below is a table of the standard measures of compactness, Reock and Polsby-Popper, for the 2023 and 2025 districts:

**Table 7 – NC CD-1 and CD-3, 2023 & 2025 Compactness**

| <b>District</b> | <b>Reock</b> | <b>Polsby-Popper</b> |
|-----------------|--------------|----------------------|
| 2023 CD-1       | 0.42         | 0.27                 |
| 2025 CD-1       | 0.49         | 0.33                 |
| 2023 CD-3       | 0.37         | 0.25                 |
| 2025 CD-3       | 0.60         | 0.26                 |

Source: Maptitude Compactness reports for the NC 2023 and 2025 CDs 1 and 3

- d. Overall, the 2025 districts score higher on both compactness measures than the 2023 districts (see Appendix B & C).

- e. Contiguity. Point VII of the 2025 Congressional Plan Criteria provides:

*Contiguity. Congressional districts shall be comprised of contiguous territory. Contiguity by water is sufficient.*

Congressional Districts 1 and 3 are fully contiguous in both the 2023 and 2025 configurations (see Appendix B & C).

- f. Existing Political Subdivisions. Point VIII of the 2025 Congressional Plan Criteria provides:

*Respect for Existing Political Subdivisions. County lines, VTDs and municipal boundaries may be considered when possible in forming districts that do not split these existing political subdivisions.*

**Table 8 – NC 2023 & 2025 County/VTD/Municipal Splits**

| <b>District</b> | <b>No. Counties Split</b> | <b>VTDs</b> | <b>Municipal Splits<sup>7</sup></b><br>(municipalities split / total splits) |
|-----------------|---------------------------|-------------|------------------------------------------------------------------------------|
| 2023 Districts  | 11                        | 20          | 48/103                                                                       |
| 2025 Districts  | 12                        | 21          | 49/105                                                                       |

Source: Maptitude County Split & Community of Interest (COI) reports for the NC CD 2023 and 2025 district configuration.

The 2025 districts overall split one more county, VTD, and municipality. There are two more splits within municipalities than in the 2023 Congressional Plan.

- g. Overall, the 2025 amendments in S.B. 249 perform as follows compared to the 2023 district configurations:
- The 2025 districts perform equally on Equal Population and contiguity.
  - The 2025 districts modestly increase compactness. Both the 2023 and 2025 districts are consistent with the criterion to make “reasonable efforts” to form compact districts.
  - The 2025 districts slightly increase county, VTD, and municipal splits, which perform worse on the criterion addressing “Existing Political Subdivisions” and the guidance that these metrics may be considered “when possible” to “not split these existing political subdivisions.”

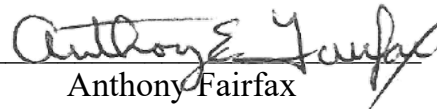
---

<sup>7</sup> I determined municipal splits by extracting the cities, towns, and villages from the Census Places layer provided by Caliper and running Maptitude’s Communities of Interest report function. The first number I report is what the General Assembly labels the “Municipality – District” Report, which reports the total number of municipalities that are split by district lines throughout the plans. The second number I report, which is not included in the General Assembly Statpacks, is the number of total times any municipality is split throughout the plans (thus counting a single municipality that is split more than one way as more than one split). I have confirmed that these municipal splits are consistent with those reported by the North Carolina General Assembly in their Statpacks, provided to by my counsel as JX081 (2023 Congressional Plan / Senate Bill 757 Statpack) and Klein Ex. 19 (2025 / Senate Bill 249 Statpack).

12. Overall, the changes to CDs 1 and 3 in Senate Bill 249 are not substantially different in plan performance for the criteria I analyzed, and do not show that the traditional redistricting criteria were improved under the 2025 configurations.
13. Incumbency Analysis: I conducted an incumbency analysis of 2025 CDs 1 and 3 using a document provided by counsel, JX056 (2023 Congressional Member Resident Address List). The only incumbent who changed from one district to another was Rep. Don Davis. Rep. Davis shifts from CD 1 to CD 3. He is now paired with Rep. Gregory Murphy in 2025 CD 3.
14. The findings and conclusions in this Report are based upon information that has been made available to me or known by me to date. My work in this matter is ongoing, and I reserve the right to modify, update, or supplement my analyses, findings, and any conclusions as additional information is made available to me or as I perform further analysis.

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.

Dated: October, 31, 2025

Signed:   
Anthony Fairfax

## **Appendices**

Appendix A - SL 2023-145/SL 2023-145 Plans Map Changes

Appendix B – SL 2025-95 Plan Maptitude Reports

Appendix C – SL 2023-145 Plan Maptitude Reports

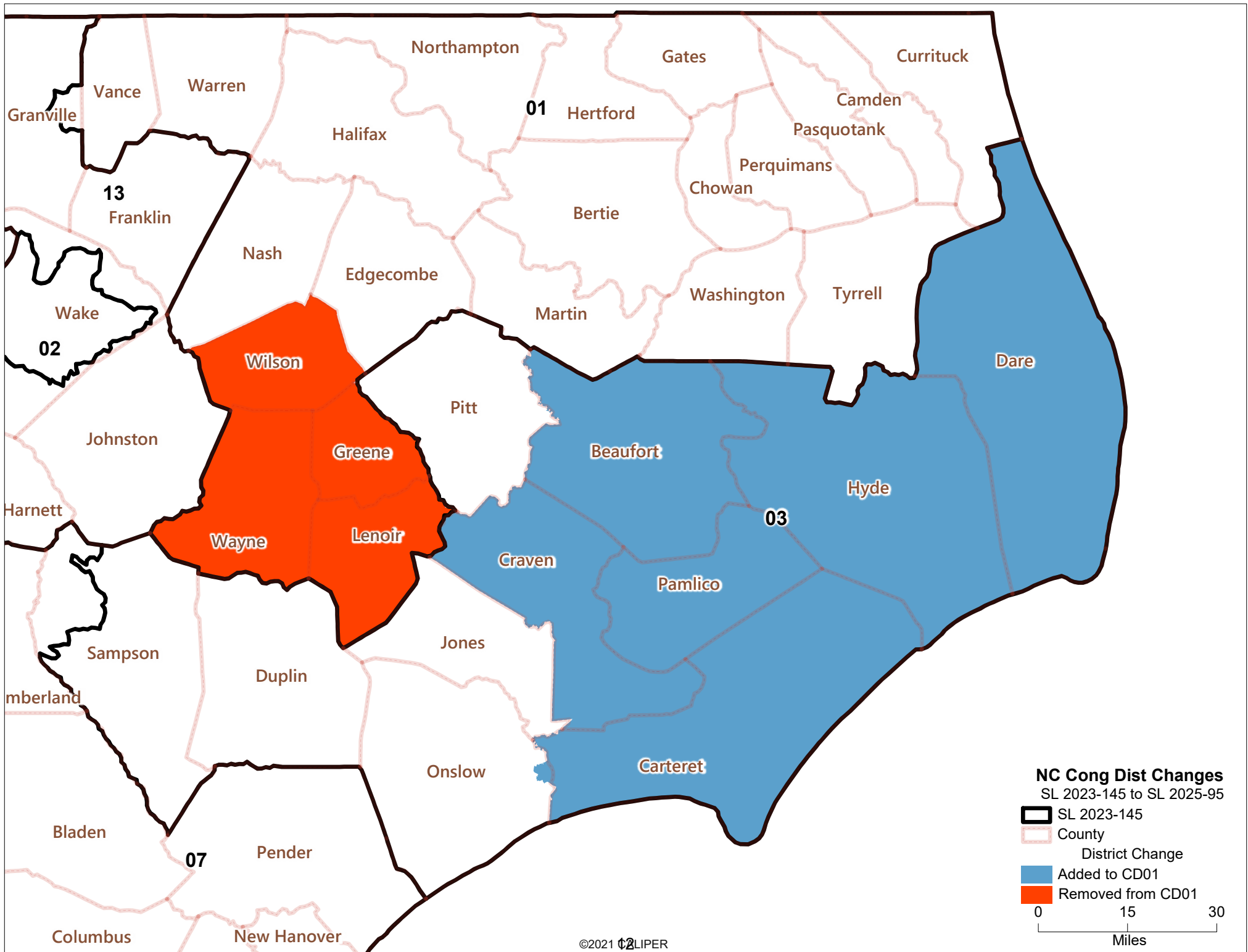
Appendix D – NC County’s BVAP and %

Appendix E – Anthony E. Fairfax Resume

## **Appendix A**

SL 2023-145/SL 2023-145 Plans Map Changes

SL 2023-145/SL 2025-95 Plan Districts 1 & 3 Changes Zoom Map



## **Appendix B**

### SL 2025-95 Plan Data Reports

Total Population #s & %s SL 2025-95 Plan Report  
Voting Age Population #s & %s SL 2025-95 Plan Report  
Citizen Voting Age Population #s & %s SL 2025-95 Plan Report  
Contiguity SL 2025-95 Plan Report  
Compactness SL 2025-95 Plan Report  
County - VTD SL 2025-95 Plan Split Report  
Census Places SL 2025-95 Plan Split Report  
County List SL 2025-95 Plan Report  
Census Place List SL 2025-95 Plan Report  
SL 2025-95 Plan Core Constituency Report

User: Tony Fairfax

Plan Name: NC CD SL 2025-95

Plan Type: NC Cong Districts

## Population Summary

Tuesday, October 28, 2025

5:44 PM

| District | Population | Deviation | % Devn. | [Hispanic<br>Origin] | NH_Wht  | NH_Ind | NH_Asn | AP_Bl   |
|----------|------------|-----------|---------|----------------------|---------|--------|--------|---------|
| 01       | 745,671    | 0         | 0.00%   | 42,659               | 426,065 | 5,046  | 7,237  | 251,298 |
| 02       | 745,670    | -1        | 0.00%   | 96,435               | 400,547 | 1,930  | 43,558 | 188,408 |
| 03       | 745,670    | -1        | 0.00%   | 92,928               | 396,511 | 3,324  | 10,685 | 228,142 |
| 04       | 745,671    | 0         | 0.00%   | 85,915               | 395,824 | 1,603  | 80,376 | 162,837 |
| 05       | 745,671    | 0         | 0.00%   | 59,024               | 507,354 | 1,984  | 16,509 | 146,858 |
| 06       | 745,671    | 0         | 0.00%   | 80,826               | 466,399 | 2,411  | 26,904 | 153,914 |
| 07       | 745,671    | 0         | 0.00%   | 61,609               | 478,702 | 16,564 | 9,508  | 160,874 |
| 08       | 745,671    | 0         | 0.00%   | 69,986               | 453,271 | 40,891 | 26,504 | 137,312 |
| 09       | 745,671    | 0         | 0.00%   | 94,277               | 437,637 | 7,450  | 14,240 | 177,432 |
| 10       | 745,670    | -1        | 0.00%   | 84,946               | 493,055 | 1,773  | 19,390 | 130,655 |
| 11       | 745,670    | -1        | 0.00%   | 57,087               | 613,832 | 10,853 | 6,744  | 33,066  |
| 12       | 745,670    | -1        | 0.00%   | 131,029              | 267,498 | 2,001  | 42,199 | 295,073 |
| 13       | 745,670    | -1        | 0.00%   | 97,421               | 470,899 | 3,191  | 8,025  | 149,850 |
| 14       | 745,671    | 0         | 0.00%   | 64,454               | 504,554 | 1,865  | 28,180 | 128,834 |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2025-95

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

User: Tony Fairfax

Plan Name: NC CD SL 2025-95

Plan Type: NC Cong Districts

## Population Summary

Tuesday, October 28, 2025

5:50 PM

| District | Population | Deviation | % Devn. | [% Hispanic Origin] | [% NH_Wht] | [% NH_Ind] | [% NH_Asn] | [% AP_Blkl] |
|----------|------------|-----------|---------|---------------------|------------|------------|------------|-------------|
| 01       | 745,671    | 0         | 0.00%   | 5.72%               | 57.14%     | 0.68%      | 0.97%      | 33.7%       |
| 02       | 745,670    | -1        | 0.00%   | 12.93%              | 53.72%     | 0.26%      | 5.84%      | 25.27%      |
| 03       | 745,670    | -1        | 0.00%   | 12.46%              | 53.18%     | 0.45%      | 1.43%      | 30.6%       |
| 04       | 745,671    | 0         | 0.00%   | 11.52%              | 53.08%     | 0.21%      | 10.78%     | 21.84%      |
| 05       | 745,671    | 0         | 0.00%   | 7.92%               | 68.04%     | 0.27%      | 2.21%      | 19.69%      |
| 06       | 745,671    | 0         | 0.00%   | 10.84%              | 62.55%     | 0.32%      | 3.61%      | 20.64%      |
| 07       | 745,671    | 0         | 0.00%   | 8.26%               | 64.2%      | 2.22%      | 1.28%      | 21.57%      |
| 08       | 745,671    | 0         | 0.00%   | 9.39%               | 60.79%     | 5.48%      | 3.55%      | 18.41%      |
| 09       | 745,671    | 0         | 0.00%   | 12.64%              | 58.69%     | 1%         | 1.91%      | 23.79%      |
| 10       | 745,670    | -1        | 0.00%   | 11.39%              | 66.12%     | 0.24%      | 2.6%       | 17.52%      |
| 11       | 745,670    | -1        | 0.00%   | 7.66%               | 82.32%     | 1.46%      | 0.9%       | 4.43%       |
| 12       | 745,670    | -1        | 0.00%   | 17.57%              | 35.87%     | 0.27%      | 5.66%      | 39.57%      |
| 13       | 745,670    | -1        | 0.00%   | 13.06%              | 63.15%     | 0.43%      | 1.08%      | 20.1%       |
| 14       | 745,671    | 0         | 0.00%   | 8.64%               | 67.66%     | 0.25%      | 3.78%      | 17.28%      |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2025-95

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Population Summary

Tuesday, October 28, 2025

5:51 PM

| District | Population | Deviation | % Devn. | [18+_Pop] | [H18+_Pop] | [NH18+_Wht] | [NH18+_Ind] | [NH18+_Asn] | [18+_AP_Bl] |
|----------|------------|-----------|---------|-----------|------------|-------------|-------------|-------------|-------------|
| 01       | 745,671    | 0         | 0.00%   | 596,783   | 27,614     | 356,476     | 4,112       | 5,526       | 192,997     |
| 02       | 745,670    | -1        | 0.00%   | 584,067   | 64,157     | 332,722     | 1,532       | 34,810      | 140,209     |
| 03       | 745,670    | -1        | 0.00%   | 576,660   | 60,800     | 323,933     | 2,629       | 8,891       | 169,543     |
| 04       | 745,671    | 0         | 0.00%   | 574,606   | 56,330     | 320,577     | 1,250       | 59,465      | 124,857     |
| 05       | 745,671    | 0         | 0.00%   | 596,194   | 38,431     | 421,313     | 1,625       | 12,366      | 111,648     |
| 06       | 745,671    | 0         | 0.00%   | 578,293   | 51,069     | 382,738     | 1,992       | 19,452      | 111,667     |
| 07       | 745,671    | 0         | 0.00%   | 593,673   | 39,354     | 400,999     | 12,778      | 7,627       | 119,140     |
| 08       | 745,671    | 0         | 0.00%   | 563,332   | 44,048     | 358,376     | 30,715      | 18,535      | 99,678      |
| 09       | 745,671    | 0         | 0.00%   | 577,673   | 60,786     | 359,252     | 5,823       | 11,384      | 129,182     |
| 10       | 745,670    | -1        | 0.00%   | 581,822   | 53,640     | 404,468     | 1,420       | 14,229      | 96,473      |
| 11       | 745,670    | -1        | 0.00%   | 609,924   | 37,835     | 516,985     | 7,823       | 5,464       | 23,682      |
| 12       | 745,670    | -1        | 0.00%   | 580,319   | 87,967     | 229,032     | 1,585       | 32,974      | 222,293     |
| 13       | 745,670    | -1        | 0.00%   | 562,248   | 60,116     | 372,444     | 2,512       | 6,313       | 109,385     |
| 14       | 745,671    | 0         | 0.00%   | 579,505   | 42,164     | 410,318     | 1,539       | 20,566      | 92,298      |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2025-95

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

User: Tony Fairfax

Plan Name: NC CD SL 2025-95

Plan Type: NC Cong Districts

## Population Summary

Tuesday, October 28, 2025

5:52 PM

| District | Population | Deviation | % Devn. | [18+_Pop] | [% H18+_Pop] | [% NH18+_Wht] | [% NH18+_Ind] | [% NH18+_Asn] | [% 18+_AP_Blkl] |
|----------|------------|-----------|---------|-----------|--------------|---------------|---------------|---------------|-----------------|
| 01       | 745,671    | 0         | 0.00%   | 596,783   | 4.63%        | 59.73%        | 0.69%         | 0.93%         | 32.34%          |
| 02       | 745,670    | -1        | 0.00%   | 584,067   | 10.98%       | 56.97%        | 0.26%         | 5.96%         | 24.01%          |
| 03       | 745,670    | -1        | 0.00%   | 576,660   | 10.54%       | 56.17%        | 0.46%         | 1.54%         | 29.4%           |
| 04       | 745,671    | 0         | 0.00%   | 574,606   | 9.8%         | 55.79%        | 0.22%         | 10.35%        | 21.73%          |
| 05       | 745,671    | 0         | 0.00%   | 596,194   | 6.45%        | 70.67%        | 0.27%         | 2.07%         | 18.73%          |
| 06       | 745,671    | 0         | 0.00%   | 578,293   | 8.83%        | 66.18%        | 0.34%         | 3.36%         | 19.31%          |
| 07       | 745,671    | 0         | 0.00%   | 593,673   | 6.63%        | 67.55%        | 2.15%         | 1.28%         | 20.07%          |
| 08       | 745,671    | 0         | 0.00%   | 563,332   | 7.82%        | 63.62%        | 5.45%         | 3.29%         | 17.69%          |
| 09       | 745,671    | 0         | 0.00%   | 577,673   | 10.52%       | 62.19%        | 1.01%         | 1.97%         | 22.36%          |
| 10       | 745,670    | -1        | 0.00%   | 581,822   | 9.22%        | 69.52%        | 0.24%         | 2.45%         | 16.58%          |
| 11       | 745,670    | -1        | 0.00%   | 609,924   | 6.2%         | 84.76%        | 1.28%         | 0.9%          | 3.88%           |
| 12       | 745,670    | -1        | 0.00%   | 580,319   | 15.16%       | 39.47%        | 0.27%         | 5.68%         | 38.31%          |
| 13       | 745,670    | -1        | 0.00%   | 562,248   | 10.69%       | 66.24%        | 0.45%         | 1.12%         | 19.45%          |
| 14       | 745,671    | 0         | 0.00%   | 579,505   | 7.28%        | 70.8%         | 0.27%         | 3.55%         | 15.93%          |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2025-95

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Contiguity Report

Wednesday, October 29, 2025

8:48 PM

| District | Number of Distinct Areas |
|----------|--------------------------|
| 01       | 1                        |
| 02       | 1                        |
| 03       | 1                        |
| 04       | 1                        |
| 05       | 1                        |
| 06       | 1                        |
| 07       | 1                        |
| 08       | 1                        |
| 09       | 1                        |
| 10       | 1                        |
| 11       | 1                        |
| 12       | 1                        |
| 13       | 1                        |
| 14       | 1                        |

## Measures of Compactness Report

Wednesday, October 29, 2025

8:58 PM

|           | Reock | Polsby-Popper |
|-----------|-------|---------------|
| Sum       | N/A   | N/A           |
| Min       | 0.28  | 0.14          |
| Max       | 0.60  | 0.33          |
| Mean      | 0.42  | 0.25          |
| Std. Dev. | 0.11  | 0.05          |

| District | Reock | Polsby-Popper |
|----------|-------|---------------|
| 01       | 0.49  | 0.33          |
| 02       | 0.49  | 0.27          |
| 03       | 0.60  | 0.26          |
| 04       | 0.45  | 0.25          |
| 05       | 0.30  | 0.23          |
| 06       | 0.41  | 0.29          |
| 07       | 0.50  | 0.28          |
| 08       | 0.35  | 0.27          |
| 09       | 0.38  | 0.16          |
| 10       | 0.28  | 0.28          |
| 11       | 0.30  | 0.27          |

|           | <b>Reock</b> | <b>Polsby-Popper</b> |
|-----------|--------------|----------------------|
| Sum       | N/A          | N/A                  |
| Min       | 0.28         | 0.14                 |
| Max       | 0.60         | 0.33                 |
| Mean      | 0.42         | 0.25                 |
| Std. Dev. | 0.11         | 0.05                 |

| <b>District</b> | <b>Reock</b> | <b>Polsby-Popper</b> |
|-----------------|--------------|----------------------|
| 12              | 0.59         | 0.28                 |
| 13              | 0.38         | 0.14                 |
| 14              | 0.32         | 0.17                 |

### Measures of Compactness Summary

|                      |                                                                       |
|----------------------|-----------------------------------------------------------------------|
| <b>Reock</b>         | The measure is always between 0 and 1, with 1 being the most compact. |
| <b>Polsby-Popper</b> | The measure is always between 0 and 1, with 1 being the most compact. |

## Political Subdivision Splits Between Districts

Wednesday, October 29, 2025

8:56 PM

Number of subdivisions not split:

|                 |       |
|-----------------|-------|
| County          | 88    |
| Voting District | 2,645 |

Number of subdivisions split into more than one district:

|                 |    |
|-----------------|----|
| County          | 12 |
| Voting District | 21 |

Number of splits involving no population:

|                 |   |
|-----------------|---|
| County          | 0 |
| Voting District | 0 |

### Split Counts

#### *County*

Cases where an area is split among 2 Districts: 9

Cases where an area is split among 3 Districts: 3

#### *Voting District*

Cases where an area is split among 2 Districts: 21

| County                 | Voting District | District | Population |
|------------------------|-----------------|----------|------------|
| <i>Split Counties:</i> |                 |          |            |
| Cabarrus NC            |                 | 06       | 101,258    |
| Cabarrus NC            |                 | 08       | 124,546    |
| Chatham NC             |                 | 04       | 40,640     |
| Chatham NC             |                 | 09       | 35,645     |
| Cumberland NC          |                 | 07       | 191,667    |
| Cumberland NC          |                 | 09       | 143,061    |
| Forsyth NC             |                 | 06       | 108,247    |
| Forsyth NC             |                 | 10       | 274,343    |
| Granville NC           |                 | 01       | 10,818     |
| Granville NC           |                 | 13       | 50,174     |
| Guilford NC            |                 | 05       | 264,080    |
| Guilford NC            |                 | 06       | 177,649    |
| Guilford NC            |                 | 09       | 99,570     |
| Mecklenburg NC         |                 | 08       | 117,166    |
| Mecklenburg NC         |                 | 12       | 745,670    |
| Mecklenburg NC         |                 | 14       | 252,646    |
| Onslow NC              |                 | 01       | 4,853      |
| Onslow NC              |                 | 03       | 199,723    |
| Polk NC                |                 | 11       | 5,779      |
| Polk NC                |                 | 14       | 13,549     |
| Robeson NC             |                 | 07       | 38,268     |
| Robeson NC             |                 | 08       | 78,262     |
| Sampson NC             |                 | 03       | 46,127     |

# Political Subdivision Splits Between Districts

NC CD SL 2025-95

| County             | Voting District    | District | Population |
|--------------------|--------------------|----------|------------|
| Sampson NC         |                    | 07       | 12,909     |
| Wake NC            |                    | 02       | 745,670    |
| Wake NC            |                    | 04       | 231,502    |
| Wake NC            |                    | 13       | 152,238    |
| <i>Split VTDs:</i> |                    |          |            |
| Cabarrus NC        | 12-13              | 06       | 7,807      |
| Cabarrus NC        | 12-13              | 08       | 199        |
| Chatham NC         | EAST WILLIAMS      | 04       | 1,496      |
| Chatham NC         | EAST WILLIAMS      | 09       | 3,670      |
| Cumberland NC      | CROSS CREEK 14     | 07       | 81         |
| Cumberland NC      | CROSS CREEK 14     | 09       | 4,129      |
| Forsyth NC         | WALKERTOWN LIBRARY | 06       | 466        |
| Forsyth NC         | WALKERTOWN LIBRARY | 10       | 4,161      |
| Granville NC       | 00SALM             | 01       | 1,252      |
| Granville NC       | 00SALM             | 13       | 1,118      |
| Guilford NC        | JEF2               | 05       | 1,034      |
| Guilford NC        | JEF2               | 09       | 3,768      |
| Guilford NC        | NDRI               | 05       | 1,658      |
| Guilford NC        | NDRI               | 06       | 2,323      |
| Mecklenburg NC     | 103                | 08       | 3,454      |
| Mecklenburg NC     | 103                | 12       | 854        |
| Mecklenburg NC     | 121                | 08       | 1,071      |
| Mecklenburg NC     | 121                | 14       | 4,030      |
| Mecklenburg NC     | 217                | 08       | 869        |
| Mecklenburg NC     | 217                | 12       | 3,619      |
| Mecklenburg NC     | 232                | 08       | 567        |
| Mecklenburg NC     | 232                | 14       | 6,741      |
| Onslow NC          | SWANSBORO          | 01       | 4,853      |
| Onslow NC          | SWANSBORO          | 03       | 2,597      |
| Polk NC            | WHITE OAK          | 11       | 1,850      |
| Polk NC            | WHITE OAK          | 14       | 452        |
| Robeson NC         | PHILADELPHUS       | 07       | 462        |
| Robeson NC         | PHILADELPHUS       | 08       | 1,761      |
| Sampson NC         | PLAINVIEW          | 03       | 744        |
| Sampson NC         | PLAINVIEW          | 07       | 3,197      |
| Wake NC            | 04-10              | 02       | 1,273      |
| Wake NC            | 04-10              | 04       | 2,691      |
| Wake NC            | 09-02              | 02       | 5,777      |
| Wake NC            | 09-02              | 13       | 647        |
| Wake NC            | 10-03              | 02       | 4,537      |
| Wake NC            | 10-03              | 13       | 154        |
| Wake NC            | 10-04              | 02       | 11,667     |
| Wake NC            | 10-04              | 13       | 1,171      |
| Wake NC            | 16-01              | 02       | 4,020      |
| Wake NC            | 16-01              | 13       | 1,364      |
| Wake NC            | 16-09              | 02       | 5,059      |
| Wake NC            | 16-09              | 13       | 1,648      |

User: Tony Fairfax

Plan Name: NC CD SL 2025-95

Plan Type: NC Cong Districts

## Communities of Interest (Landscape, 11x8.5)

Thursday, October 30, 2025

11:26 AM

| City/Town           | District | Population | %     |
|---------------------|----------|------------|-------|
| Archdale City       | 06       | 130        | 1.1   |
| Archdale City       | 09       | 11,777     | 98.9  |
| Beech Mountain Town | 05       | 613        | 90.8  |
| Beech Mountain Town | 11       | 62         | 9.2   |
| Candor Town         | 08       | 813        | 100.0 |
| Candor Town         | 09       | 0          | 0.0   |
| Cary Town           | 02       | 84,668     | 48.5  |
| Cary Town           | 04       | 83,005     | 47.5  |
| Cary Town           | 09       | 3,271      | 1.9   |
| Cary Town           | 13       | 3,777      | 2.2   |
| Charlotte City      | 08       | 63,098     | 7.2   |
| Charlotte City      | 12       | 709,319    | 81.1  |
| Charlotte City      | 14       | 102,162    | 11.7  |
| Clemmons Village    | 06       | 13,930     | 65.8  |
| Clemmons Village    | 10       | 7,233      | 34.2  |
| Columbus Town       | 11       | 0          | 0.0   |
| Columbus Town       | 14       | 1,060      | 100.0 |
| Concord City        | 06       | 47,474     | 45.1  |
| Concord City        | 08       | 57,766     | 54.9  |
| Davidson Town       | 10       | 378        | 2.5   |
| Davidson Town       | 14       | 14,728     | 97.5  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

| City/Town          | District | Population | %     |
|--------------------|----------|------------|-------|
| Durham City        | 02       | 269        | 0.1   |
| Durham City        | 04       | 283,237    | 99.9  |
| Elm City Town      | 01       | 0          | 0.0   |
| Elm City Town      | 03       | 1,218      | 100.0 |
| Fayetteville City  | 07       | 79,356     | 38.1  |
| Fayetteville City  | 09       | 129,145    | 61.9  |
| Fuquay-Varina Town | 04       | 12,393     | 36.3  |
| Fuquay-Varina Town | 13       | 21,759     | 63.7  |
| Garner Town        | 02       | 27,258     | 87.5  |
| Garner Town        | 13       | 3,901      | 12.5  |
| Greensboro City    | 05       | 224,189    | 75.0  |
| Greensboro City    | 06       | 63,407     | 21.2  |
| Greensboro City    | 09       | 11,439     | 3.8   |
| Hickory City       | 05       | 32         | 0.1   |
| Hickory City       | 10       | 43,379     | 99.7  |
| Hickory City       | 14       | 79         | 0.2   |
| High Point City    | 06       | 113,933    | 99.9  |
| High Point City    | 09       | 126        | 0.1   |
| Holly Springs Town | 04       | 35,190     | 85.3  |
| Holly Springs Town | 13       | 6,049      | 14.7  |
| Jamestown Town     | 06       | 7          | 0.2   |
| Jamestown Town     | 09       | 3,661      | 99.8  |
| Kannapolis City    | 06       | 52,324     | 98.5  |
| Kannapolis City    | 08       | 790        | 1.5   |
| Kenly Town         | 03       | 198        | 13.3  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

| City/Town         | District | Population | %    |
|-------------------|----------|------------|------|
| Kenly Town        | 13       | 1,293      | 86.7 |
| Kernersville Town | 05       | 82         | 0.3  |
| Kernersville Town | 06       | 26,367     | 99.7 |
| Kernersville Town | 10       | 0          | 0.0  |
| King City         | 05       | 6,606      | 91.8 |
| King City         | 10       | 591        | 8.2  |
| Long View Town    | 10       | 4,353      | 85.6 |
| Long View Town    | 14       | 735        | 14.5 |
| Lumberton City    | 07       | 454        | 2.4  |
| Lumberton City    | 08       | 18,571     | 97.6 |
| Matthews Town     | 08       | 25,816     | 87.7 |
| Matthews Town     | 12       | 3,619      | 12.3 |
| Mebane City       | 04       | 3,171      | 17.8 |
| Mebane City       | 09       | 14,626     | 82.2 |
| Mint Hill Town    | 08       | 22,547     | 85.2 |
| Mint Hill Town    | 12       | 3,903      | 14.8 |
| Morrisville Town  | 02       | 10,457     | 35.3 |
| Morrisville Town  | 04       | 19,173     | 64.7 |
| Oxford City       | 01       | 8,485      | 98.3 |
| Oxford City       | 13       | 143        | 1.7  |
| Pineville Town    | 12       | 2,700      | 25.5 |
| Pineville Town    | 14       | 7,902      | 74.5 |
| Raleigh City      | 02       | 464,574    | 99.3 |
| Raleigh City      | 04       | 1,559      | 0.3  |
| Raleigh City      | 13       | 1,532      | 0.3  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

| City/Town               | District | Population | %     |
|-------------------------|----------|------------|-------|
| Red Springs Town        | 08       | 3,087      | 100.0 |
| Red Springs Town        | 09       | 0          | 0.0   |
| Rhodhiss Town           | 05       | 358        | 35.9  |
| Rhodhiss Town           | 14       | 639        | 64.1  |
| Rolesville Town         | 02       | 5,501      | 58.1  |
| Rolesville Town         | 13       | 3,974      | 41.9  |
| Rutherford College Town | 05       | 0          | 0.0   |
| Rutherford College Town | 14       | 1,226      | 100.0 |
| Seven Devils Town       | 05       | 275        | 87.9  |
| Seven Devils Town       | 11       | 38         | 12.1  |
| Sharpsburg Town         | 01       | 1,276      | 75.2  |
| Sharpsburg Town         | 03       | 421        | 24.8  |
| Summerfield Town        | 05       | 8,442      | 77.1  |
| Summerfield Town        | 09       | 2,509      | 22.9  |
| Surf City Town          | 03       | 334        | 8.6   |
| Surf City Town          | 07       | 3,533      | 91.4  |
| Swansboro Town          | 01       | 3,536      | 94.4  |
| Swansboro Town          | 03       | 208        | 5.6   |
| Thomasville City        | 06       | 26,662     | 98.1  |
| Thomasville City        | 09       | 521        | 1.9   |
| Tobaccoville Village    | 05       | 0          | 0.0   |
| Tobaccoville Village    | 10       | 2,578      | 100.0 |
| Wake Forest Town        | 02       | 32,623     | 68.5  |
| Wake Forest Town        | 13       | 14,978     | 31.5  |
| Walkertown Town         | 06       | 1,081      | 19.0  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

| City/Town          | District | Population | %     |
|--------------------|----------|------------|-------|
| Walkertown Town    | 10       | 4,611      | 81.0  |
| Wallace Town       | 03       | 3,413      | 100.0 |
| Wallace Town       | 07       | 0          | 0.0   |
| Wendell Town       | 02       | 9,765      | 99.7  |
| Wendell Town       | 13       | 28         | 0.3   |
| Winston-Salem City | 06       | 33,949     | 13.6  |
| Winston-Salem City | 10       | 215,596    | 86.4  |
| Zebulon Town       | 02       | 4,668      | 67.6  |
| Zebulon Town       | 13       | 2,235      | 32.4  |

| City/Town                 | -- Listed by District |                |
|---------------------------|-----------------------|----------------|
|                           | Population            | %              |
| Elm City Town (part)      | 0                     | 0.0            |
| Oxford City (part)        | 8,485                 | 98.3           |
| Sharpsburg Town (part)    | 1,276                 | 75.2           |
| Swansboro Town (part)     | 3,536                 | 94.4           |
| <b>District 01 Totals</b> |                       | <b>317,765</b> |
| Cary Town (part)          | 84,668                | 48.5           |
| Durham City (part)        | 269                   | 0.1            |
| Garner Town (part)        | 27,258                | 87.5           |
| Morrisville Town (part)   | 10,457                | 35.3           |
| Raleigh City (part)       | 464,574               | 99.3           |
| Rolesville Town (part)    | 5,501                 | 58.1           |
| Wake Forest Town (part)   | 32,623                | 68.5           |
| Zebulon Town (part)       | 4,668                 | 67.6           |
| <b>District 02 Totals</b> |                       | <b>659,218</b> |
| Kenly Town (part)         | 198                   | 13.3           |
| Sharpsburg Town (part)    | 421                   | 24.8           |
| Surf City Town (part)     | 334                   | 8.6            |
| Swansboro Town (part)     | 208                   | 5.6            |
| <b>District 03 Totals</b> |                       | <b>337,373</b> |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

|                                | Population     | %    |
|--------------------------------|----------------|------|
| Cary Town (part)               | 83,005         | 47.5 |
| Fuquay-Varina Town (part)      | 12,393         | 36.3 |
| Holly Springs Town (part)      | 35,190         | 85.3 |
| Mebane City (part)             | 3,171          | 17.8 |
| Morrisville Town (part)        | 19,173         | 64.7 |
| Raleigh City (part)            | 1,559          | 0.3  |
| <hr/>                          |                |      |
| <b>District 04 Totals</b>      | <b>593,960</b> |      |
| Beech Mountain Town (part)     | 613            | 90.8 |
| Greensboro City (part)         | 224,189        | 75.0 |
| Hickory City (part)            | 32             | 0.1  |
| Kernersville Town (part)       | 82             | 0.3  |
| King City (part)               | 6,606          | 91.8 |
| Rhodhiss Town (part)           | 358            | 35.9 |
| Rutherford College Town (part) | 0              | 0.0  |
| Seven Devils Town (part)       | 275            | 87.9 |
| Summerfield Town (part)        | 8,442          | 77.1 |
| Tobaccoville Village (part)    | 0              | 0.0  |
| <hr/>                          |                |      |
| <b>District 05 Totals</b>      | <b>386,989</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

|                           | Population     | %    |
|---------------------------|----------------|------|
| Archdale City (part)      | 130            | 1.1  |
| Clemmons Village (part)   | 13,930         | 65.8 |
| Concord City (part)       | 47,474         | 45.1 |
| Greensboro City (part)    | 63,407         | 21.2 |
| Jamestown Town (part)     | 7              | 0.2  |
| Kannapolis City (part)    | 52,324         | 98.5 |
| Thomasville City (part)   | 26,662         | 98.1 |
| Walkertown Town (part)    | 1,081          | 19.0 |
| Winston-Salem City (part) | 33,949         | 13.6 |
| <b>District 06 Totals</b> | <b>473,633</b> |      |
| Fayetteville City (part)  | 79,356         | 38.1 |
| Lumberton City (part)     | 454            | 2.4  |
| Surf City Town (part)     | 3,533          | 91.4 |
| Wallace Town (part)       | 0              | 0.0  |
| <b>District 07 Totals</b> | <b>333,761</b> |      |
| Charlotte City (part)     | 63,098         | 7.2  |
| Concord City (part)       | 57,766         | 54.9 |
| Kannapolis City (part)    | 790            | 1.5  |
| Lumberton City (part)     | 18,571         | 97.6 |
| Matthews Town (part)      | 25,816         | 87.7 |
| Mint Hill Town (part)     | 22,547         | 85.2 |
| <b>District 08 Totals</b> | <b>471,095</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

|                            | Population     | %    |
|----------------------------|----------------|------|
| Archdale City (part)       | 11,777         | 98.9 |
| Candor Town (part)         | 0              | 0.0  |
| Cary Town (part)           | 3,271          | 1.9  |
| Fayetteville City (part)   | 129,145        | 61.9 |
| Greensboro City (part)     | 11,439         | 3.8  |
| High Point City (part)     | 126            | 0.1  |
| Mebane City (part)         | 14,626         | 82.2 |
| Red Springs Town (part)    | 0              | 0.0  |
| Summerfield Town (part)    | 2,509          | 22.9 |
| Thomasville City (part)    | 521            | 1.9  |
| <b>District 09 Totals</b>  | <b>411,757</b> |      |
| Clemmons Village (part)    | 7,233          | 34.2 |
| Davidson Town (part)       | 378            | 2.5  |
| Kernersville Town (part)   | 0              | 0.0  |
| King City (part)           | 591            | 8.2  |
| Long View Town (part)      | 4,353          | 85.6 |
| Walkertown Town (part)     | 4,611          | 81.0 |
| Winston-Salem City (part)  | 215,596        | 86.4 |
| <b>District 10 Totals</b>  | <b>425,156</b> |      |
| Beech Mountain Town (part) | 62             | 9.2  |
| Columbus Town (part)       | 0              | 0.0  |
| Seven Devils Town (part)   | 38             | 12.1 |
| <b>District 11 Totals</b>  | <b>214,219</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2025-95

|                           | Population     | %    |
|---------------------------|----------------|------|
| Charlotte City (part)     | 709,319        | 81.1 |
| Matthews Town (part)      | 3,619          | 12.3 |
| Mint Hill Town (part)     | 3,903          | 14.8 |
| Pineville Town (part)     | 2,700          | 25.5 |
| <b>District 12 Totals</b> | <b>719,541</b> |      |
| Cary Town (part)          | 3,777          | 2.2  |
| Fuquay-Varina Town (part) | 21,759         | 63.7 |
| Garner Town (part)        | 3,901          | 12.5 |
| Holly Springs Town (part) | 6,049          | 14.7 |
| Kenly Town (part)         | 1,293          | 86.7 |
| Oxford City (part)        | 143            | 1.7  |
| Raleigh City (part)       | 1,532          | 0.3  |
| Rolesville Town (part)    | 3,974          | 41.9 |
| Wake Forest Town (part)   | 14,978         | 31.5 |
| Wendell Town (part)       | 28             | 0.3  |
| Zebulon Town (part)       | 2,235          | 32.4 |
| <b>District 13 Totals</b> | <b>210,167</b> |      |
| Charlotte City (part)     | 102,162        | 11.7 |
| Davidson Town (part)      | 14,728         | 97.5 |
| Hickory City (part)       | 79             | 0.2  |
| Long View Town (part)     | 735            | 14.5 |
| Pineville Town (part)     | 7,902          | 74.5 |
| Rhodhiss Town (part)      | 639            | 64.1 |
| Spencer Mountain Town     | 0              | 0.0  |
| <b>District 14 Totals</b> | <b>462,971</b> |      |

**Summary Statistics**

|                                |     |
|--------------------------------|-----|
| Number of City/Town not split  | 504 |
| Number of City/Town split      | 49  |
| Number of City/Town split in 2 | 43  |
| Number of City/Town split in 3 | 5   |
| Number of City/Town split in 4 | 1   |
| Total number of splits         | 105 |

## County by District and by County

Wednesday, October 29, 2025

10:27 PM

|                          | Population     | % of District | [18+_Pop]      | % of District | [18+_AP_Blk]   | % of District |
|--------------------------|----------------|---------------|----------------|---------------|----------------|---------------|
| <b>District 01</b>       | 745,671        |               | 596,783        |               | 192,997        |               |
| Beaufort NC              | 44,652         | 100.00%       | 36,005         | 100.00%       | 8,283          | 100.00%       |
| Bertie NC                | 17,934         | 100.00%       | 14,896         | 100.00%       | 9,001          | 100.00%       |
| Camden NC                | 10,355         | 100.00%       | 7,887          | 100.00%       | 935            | 100.00%       |
| Carteret NC              | 67,686         | 100.00%       | 56,213         | 100.00%       | 3,036          | 100.00%       |
| Chowan NC                | 13,708         | 100.00%       | 11,114         | 100.00%       | 3,569          | 100.00%       |
| Craven NC                | 100,720        | 100.00%       | 79,783         | 100.00%       | 16,661         | 100.00%       |
| Currituck NC             | 28,100         | 100.00%       | 22,004         | 100.00%       | 1,279          | 100.00%       |
| Dare NC                  | 36,915         | 100.00%       | 30,445         | 100.00%       | 705            | 100.00%       |
| Edgecombe NC             | 48,900         | 100.00%       | 38,189         | 100.00%       | 21,540         | 100.00%       |
| Gates NC                 | 10,478         | 100.00%       | 8,343          | 100.00%       | 2,622          | 100.00%       |
| Granville NC             | 10,818         | 17.74%        | 8,521          | 17.68%        | 4,444          | 28.84%        |
| Halifax NC               | 48,622         | 100.00%       | 38,975         | 100.00%       | 20,135         | 100.00%       |
| Hertford NC              | 21,552         | 100.00%       | 17,639         | 100.00%       | 10,111         | 100.00%       |
| Hyde NC                  | 4,589          | 100.00%       | 3,785          | 100.00%       | 1,073          | 100.00%       |
| Martin NC                | 22,031         | 100.00%       | 17,615         | 100.00%       | 7,218          | 100.00%       |
| Nash NC                  | 94,970         | 100.00%       | 74,574         | 100.00%       | 29,361         | 100.00%       |
| Northampton NC           | 17,471         | 100.00%       | 14,372         | 100.00%       | 7,937          | 100.00%       |
| Onslow NC                | 4,853          | 2.37%         | 3,802          | 2.41%         | 170            | 0.70%         |
| Pamlico NC               | 12,276         | 100.00%       | 10,478         | 100.00%       | 1,896          | 100.00%       |
| Pasquotank NC            | 40,568         | 100.00%       | 31,964         | 100.00%       | 11,738         | 100.00%       |
| Perquimans NC            | 13,005         | 100.00%       | 10,592         | 100.00%       | 2,288          | 100.00%       |
| Tyrrell NC               | 3,245          | 100.00%       | 2,574          | 100.00%       | 787            | 100.00%       |
| Vance NC                 | 42,578         | 100.00%       | 32,871         | 100.00%       | 16,430         | 100.00%       |
| Warren NC                | 18,642         | 100.00%       | 15,292         | 100.00%       | 7,537          | 100.00%       |
| Washington NC            | 11,003         | 100.00%       | 8,850          | 100.00%       | 4,241          | 100.00%       |
| <b>Total District 01</b> | <b>745,671</b> |               | <b>596,783</b> |               | <b>192,997</b> |               |
| <b>District 02</b>       | 745,670        |               | 584,067        |               | 140,209        |               |
| Wake NC                  | 745,670        | 66.02%        | 584,067        | 67.91%        | 140,209        | 82.61%        |
| <b>Total District 02</b> | <b>745,670</b> |               | <b>584,067</b> |               | <b>140,209</b> |               |
| <b>District 03</b>       | 745,670        |               | 576,660        |               | 169,543        |               |
| Duplin NC                | 48,715         | 100.00%       | 37,043         | 100.00%       | 9,428          | 100.00%       |
| Greene NC                | 20,451         | 100.00%       | 16,566         | 100.00%       | 6,175          | 100.00%       |
| Jones NC                 | 9,172          | 100.00%       | 7,481          | 100.00%       | 2,229          | 100.00%       |
| Lenoir NC                | 55,122         | 100.00%       | 42,923         | 100.00%       | 17,369         | 100.00%       |
| Onslow NC                | 199,723        | 97.63%        | 153,665        | 97.59%        | 23,964         | 99.30%        |
| Pitt NC                  | 170,243        | 100.00%       | 132,273        | 100.00%       | 47,241         | 100.00%       |
| Sampson NC               | 46,127         | 78.13%        | 35,152         | 78.23%        | 10,434         | 90.20%        |
| Wayne NC                 | 117,333        | 100.00%       | 90,502         | 100.00%       | 28,806         | 100.00%       |
| Wilson NC                | 78,784         | 100.00%       | 61,055         | 100.00%       | 23,897         | 100.00%       |

|                          | Population     | % of District | [18+_Pop]      | % of District | [18+_AP_Blk]   | % of District |
|--------------------------|----------------|---------------|----------------|---------------|----------------|---------------|
| <b>Total District 03</b> | <b>745,670</b> |               | <b>576,660</b> |               | <b>169,543</b> |               |
| <b>District 04</b>       | 745,671        |               | 574,606        |               | 124,857        |               |
| Chatham NC               | 40,640         | 53.27%        | 32,813         | 53.98%        | 3,041          | 43.81%        |
| Durham NC                | 324,833        | 100.00%       | 259,565        | 100.00%       | 92,051         | 100.00%       |
| Orange NC                | 148,696        | 100.00%       | 119,527        | 100.00%       | 14,231         | 100.00%       |
| Wake NC                  | 231,502        | 20.50%        | 162,701        | 18.92%        | 15,534         | 9.15%         |
| <b>Total District 04</b> | <b>745,671</b> |               | <b>574,606</b> |               | <b>124,857</b> |               |
| <b>District 05</b>       | 745,671        |               | 596,194        |               | 111,648        |               |
| Alexander NC             | 36,444         | 100.00%       | 29,273         | 100.00%       | 1,816          | 100.00%       |
| Alleghany NC             | 10,888         | 100.00%       | 8,942          | 100.00%       | 122            | 100.00%       |
| Ashe NC                  | 26,577         | 100.00%       | 21,984         | 100.00%       | 171            | 100.00%       |
| Caldwell NC              | 80,652         | 100.00%       | 64,436         | 100.00%       | 3,506          | 100.00%       |
| Guilford NC              | 264,080        | 48.79%        | 207,048        | 48.86%        | 83,228         | 56.98%        |
| Rockingham NC            | 91,096         | 100.00%       | 72,783         | 100.00%       | 14,158         | 100.00%       |
| Stokes NC                | 44,520         | 100.00%       | 36,049         | 100.00%       | 1,553          | 100.00%       |
| Surry NC                 | 71,359         | 100.00%       | 56,438         | 100.00%       | 2,322          | 100.00%       |
| Watauga NC               | 54,086         | 100.00%       | 46,590         | 100.00%       | 2,378          | 100.00%       |
| Wilkes NC                | 65,969         | 100.00%       | 52,651         | 100.00%       | 2,394          | 100.00%       |
| <b>Total District 05</b> | <b>745,671</b> |               | <b>596,194</b> |               | <b>111,648</b> |               |
| <b>District 06</b>       | 745,671        |               | 578,293        |               | 111,667        |               |
| Cabarrus NC              | 101,258        | 44.84%        | 74,336         | 44.37%        | 17,269         | 52.16%        |
| Davidson NC              | 168,930        | 100.00%       | 132,179        | 100.00%       | 13,115         | 100.00%       |
| Davie NC                 | 42,712         | 100.00%       | 33,784         | 100.00%       | 2,163          | 100.00%       |
| Forsyth NC               | 108,247        | 28.29%        | 83,827         | 28.19%        | 14,481         | 18.70%        |
| Guilford NC              | 177,649        | 32.82%        | 139,199        | 32.85%        | 46,011         | 31.50%        |
| Rowan NC                 | 146,875        | 100.00%       | 114,968        | 100.00%       | 18,628         | 100.00%       |
| <b>Total District 06</b> | <b>745,671</b> |               | <b>578,293</b> |               | <b>111,667</b> |               |
| <b>District 07</b>       | 745,671        |               | 593,673        |               | 119,140        |               |
| Bladen NC                | 29,606         | 100.00%       | 23,426         | 100.00%       | 7,894          | 100.00%       |
| Brunswick NC             | 136,693        | 100.00%       | 116,606        | 100.00%       | 9,916          | 100.00%       |
| Columbus NC              | 50,623         | 100.00%       | 40,316         | 100.00%       | 12,073         | 100.00%       |
| Cumberland NC            | 191,667        | 57.26%        | 144,267        | 56.69%        | 52,580         | 50.97%        |
| New Hanover NC           | 225,702        | 100.00%       | 184,113        | 100.00%       | 23,247         | 100.00%       |
| Pender NC                | 60,203         | 100.00%       | 46,608         | 100.00%       | 6,583          | 100.00%       |
| Robeson NC               | 38,268         | 32.84%        | 28,553         | 32.28%        | 5,713          | 26.68%        |
| Sampson NC               | 12,909         | 21.87%        | 9,784          | 21.77%        | 1,134          | 9.80%         |
| <b>Total District 07</b> | <b>745,671</b> |               | <b>593,673</b> |               | <b>119,140</b> |               |
| <b>District 08</b>       | 745,671        |               | 563,332        |               | 99,678         |               |
| Anson NC                 | 22,055         | 100.00%       | 17,845         | 100.00%       | 8,079          | 100.00%       |
| Cabarrus NC              | 124,546        | 55.16%        | 93,203         | 55.63%        | 15,841         | 47.84%        |
| Mecklenburg NC           | 117,166        | 10.50%        | 88,994         | 10.35%        | 8,706          | 3.28%         |
| Montgomery NC            | 25,751         | 100.00%       | 20,177         | 100.00%       | 3,475          | 100.00%       |

# County by District and by County

NC CD SL 2025-95

|                          | Population     | % of District | [18+_Pop]      | % of District | [18+_AP_Bl]    | % of District |
|--------------------------|----------------|---------------|----------------|---------------|----------------|---------------|
| Richmond NC              | 42,946         | 100.00%       | 33,238         | 100.00%       | 10,143         | 100.00%       |
| Robeson NC               | 78,262         | 67.16%        | 59,902         | 67.72%        | 15,703         | 73.32%        |
| Scotland NC              | 34,174         | 100.00%       | 26,845         | 100.00%       | 10,379         | 100.00%       |
| Stanly NC                | 62,504         | 100.00%       | 49,264         | 100.00%       | 5,810          | 100.00%       |
| Union NC                 | 238,267        | 100.00%       | 173,864        | 100.00%       | 21,542         | 100.00%       |
| <b>Total District 08</b> | <b>745,671</b> |               | <b>563,332</b> |               | <b>99,678</b>  |               |
| <b>District 09</b>       | 745,671        |               | 577,673        |               | 129,182        |               |
| Alamance NC              | 171,415        | 100.00%       | 133,969        | 100.00%       | 27,878         | 100.00%       |
| Chatham NC               | 35,645         | 46.73%        | 27,975         | 46.02%        | 3,900          | 56.19%        |
| Cumberland NC            | 143,061        | 42.74%        | 110,214        | 43.31%        | 50,588         | 49.03%        |
| Guilford NC              | 99,570         | 18.39%        | 77,516         | 18.29%        | 16,839         | 11.53%        |
| Hoke NC                  | 52,082         | 100.00%       | 37,472         | 100.00%       | 13,473         | 100.00%       |
| Moore NC                 | 99,727         | 100.00%       | 78,212         | 100.00%       | 9,011          | 100.00%       |
| Randolph NC              | 144,171        | 100.00%       | 112,315        | 100.00%       | 7,493          | 100.00%       |
| <b>Total District 09</b> | <b>745,671</b> |               | <b>577,673</b> |               | <b>129,182</b> |               |
| <b>District 10</b>       | 745,670        |               | 581,822        |               | 96,473         |               |
| Catawba NC               | 160,610        | 100.00%       | 126,566        | 100.00%       | 11,181         | 100.00%       |
| Forsyth NC               | 274,343        | 71.71%        | 213,561        | 71.81%        | 62,945         | 81.30%        |
| Iredell NC               | 186,693        | 100.00%       | 143,795        | 100.00%       | 17,388         | 100.00%       |
| Lincoln NC               | 86,810         | 100.00%       | 68,416         | 100.00%       | 3,975          | 100.00%       |
| Yadkin NC                | 37,214         | 100.00%       | 29,484         | 100.00%       | 984            | 100.00%       |
| <b>Total District 10</b> | <b>745,670</b> |               | <b>581,822</b> |               | <b>96,473</b>  |               |
| <b>District 11</b>       | 745,670        |               | 609,924        |               | 23,682         |               |
| Avery NC                 | 17,806         | 100.00%       | 15,104         | 100.00%       | 718            | 100.00%       |
| Buncombe NC              | 269,452        | 100.00%       | 219,874        | 100.00%       | 13,666         | 100.00%       |
| Cherokee NC              | 28,774         | 100.00%       | 24,051         | 100.00%       | 404            | 100.00%       |
| Clay NC                  | 11,089         | 100.00%       | 9,234          | 100.00%       | 80             | 100.00%       |
| Graham NC                | 8,030          | 100.00%       | 6,370          | 100.00%       | 81             | 100.00%       |
| Haywood NC               | 62,089         | 100.00%       | 51,091         | 100.00%       | 758            | 100.00%       |
| Henderson NC             | 116,281        | 100.00%       | 94,428         | 100.00%       | 3,161          | 100.00%       |
| Jackson NC               | 43,109         | 100.00%       | 35,790         | 100.00%       | 1,057          | 100.00%       |
| Macon NC                 | 37,014         | 100.00%       | 30,345         | 100.00%       | 355            | 100.00%       |
| Madison NC               | 21,193         | 100.00%       | 17,481         | 100.00%       | 295            | 100.00%       |
| McDowell NC              | 44,578         | 100.00%       | 35,805         | 100.00%       | 1,654          | 100.00%       |
| Mitchell NC              | 14,903         | 100.00%       | 12,246         | 100.00%       | 87             | 100.00%       |
| Polk NC                  | 5,779          | 29.90%        | 4,726          | 29.17%        | 91             | 13.98%        |
| Swain NC                 | 14,117         | 100.00%       | 10,975         | 100.00%       | 147            | 100.00%       |
| Transylvania NC          | 32,986         | 100.00%       | 27,299         | 100.00%       | 979            | 100.00%       |
| Yancey NC                | 18,470         | 100.00%       | 15,105         | 100.00%       | 149            | 100.00%       |
| <b>Total District 11</b> | <b>745,670</b> |               | <b>609,924</b> |               | <b>23,682</b>  |               |
| <b>District 12</b>       | 745,670        |               | 580,319        |               | 222,293        |               |
| Mecklenburg NC           | 745,670        | 66.85%        | 580,319        | 67.48%        | 222,293        | 83.70%        |
| <b>Total District 12</b> | <b>745,670</b> |               | <b>580,319</b> |               | <b>222,293</b> |               |

|                          | Population     | % of District | [18+_Pop]      | % of District | [18+_AP_Bl]    | % of District |
|--------------------------|----------------|---------------|----------------|---------------|----------------|---------------|
| <b>District 13</b>       | 745,670        |               | 562,248        |               | 109,385        |               |
| Caswell NC               | 22,736         | 100.00%       | 18,596         | 100.00%       | 5,964          | 100.00%       |
| Franklin NC              | 68,573         | 100.00%       | 53,144         | 100.00%       | 13,059         | 100.00%       |
| Granville NC             | 50,174         | 82.26%        | 39,674         | 82.32%        | 10,963         | 71.16%        |
| Harnett NC               | 133,568        | 100.00%       | 98,069         | 100.00%       | 21,657         | 100.00%       |
| Johnston NC              | 215,999        | 100.00%       | 160,099        | 100.00%       | 26,787         | 100.00%       |
| Lee NC                   | 63,285         | 100.00%       | 48,392         | 100.00%       | 8,878          | 100.00%       |
| Person NC                | 39,097         | 100.00%       | 30,963         | 100.00%       | 8,086          | 100.00%       |
| Wake NC                  | 152,238        | 13.48%        | 113,311        | 13.17%        | 13,991         | 8.24%         |
| <b>Total District 13</b> | <b>745,670</b> |               | <b>562,248</b> |               | <b>109,385</b> |               |
| <b>District 14</b>       | 745,671        |               | 579,505        |               | 92,298         |               |
| Burke NC                 | 87,570         | 100.00%       | 70,018         | 100.00%       | 4,485          | 100.00%       |
| Cleveland NC             | 99,519         | 100.00%       | 78,032         | 100.00%       | 16,017         | 100.00%       |
| Gaston NC                | 227,943        | 100.00%       | 177,846        | 100.00%       | 31,549         | 100.00%       |
| Mecklenburg NC           | 252,646        | 22.65%        | 190,712        | 22.18%        | 34,578         | 13.02%        |
| Polk NC                  | 13,549         | 70.10%        | 11,478         | 70.83%        | 560            | 86.02%        |
| Rutherford NC            | 64,444         | 100.00%       | 51,419         | 100.00%       | 5,109          | 100.00%       |
| <b>Total District 14</b> | <b>745,671</b> |               | <b>579,505</b> |               | <b>92,298</b>  |               |

## Core Constituencies

Tuesday, October 28, 2025

12:18 PM

From Plan: NC CD SL 2023-145

### Plan: NC CD SL 2025-95, District 01 --

745,671 Total Population

|                        | Population       | [Hispanic Origin] | NH_Wht           | AP_Bl            |
|------------------------|------------------|-------------------|------------------|------------------|
| Dist. 01               | 473,980 (63.56%) | 25,220 (59.12%)   | 226,191 (53.09%) | 208,936 (83.14%) |
| Dist. 03               | 271,691 (36.44%) | 17,439 (40.88%)   | 199,874 (46.91%) | 42,362 (16.86%)  |
| Total and % Population |                  | 42,659 (5.72%)    | 426,065 (57.14%) | 251,298 (33.70%) |

### Plan: NC CD SL 2025-95, District 02 --

745,670 Total Population

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 02               | 745,670 (100.00%) | 96,435 (100.00%)  | 400,547 (100.00%) | 188,408 (100.00%) |
| Total and % Population |                   | 96,435 (12.93%)   | 400,547 (53.72%)  | 188,408 (25.27%)  |

### Plan: NC CD SL 2025-95, District 03 --

745,670 Total Population

|                        | Population       | [Hispanic Origin] | NH_Wht           | AP_Bl            |
|------------------------|------------------|-------------------|------------------|------------------|
| Dist. 01               | 271,690 (36.44%) | 31,252 (33.63%)   | 132,531 (33.42%) | 100,807 (44.19%) |
| Dist. 03               | 473,980 (63.56%) | 61,676 (66.37%)   | 263,980 (66.58%) | 127,335 (55.81%) |
| Total and % Population |                  | 92,928 (12.46%)   | 396,511 (53.18%) | 228,142 (30.60%) |

### Plan: NC CD SL 2025-95, District 04 --

745,671 Total Population

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 04               | 745,671 (100.00%) | 85,915 (100.00%)  | 395,824 (100.00%) | 162,837 (100.00%) |
| Total and % Population |                   | 85,915 (11.52%)   | 395,824 (53.08%)  | 162,837 (21.84%)  |

### Plan: NC CD SL 2025-95, District 05 --

745,671 Total Population

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 05               | 745,671 (100.00%) | 59,024 (100.00%)  | 507,354 (100.00%) | 146,858 (100.00%) |
| Total and % Population |                   | 59,024 (7.92%)    | 507,354 (68.04%)  | 146,858 (19.69%)  |

### Plan: NC CD SL 2025-95, District 06 --

745,671 Total Population

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 06               | 745,671 (100.00%) | 80,826 (100.00%)  | 466,399 (100.00%) | 153,914 (100.00%) |
| Total and % Population |                   | 80,826 (10.84%)   | 466,399 (62.55%)  | 153,914 (20.64%)  |

### Plan: NC CD SL 2025-95, District 07 --

745,671 Total Population

|  | Population | [Hispanic Origin] | NH_Wht | AP_Bl |
|--|------------|-------------------|--------|-------|
|--|------------|-------------------|--------|-------|

From Plan: **NC CD SL 2023-145****Plan: NC CD SL 2025-95, District 07 --****745,671 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 07               | 745,671 (100.00%) | 61,609 (100.00%)  | 478,702 (100.00%) | 160,874 (100.00%) |
| Total and % Population |                   | 61,609 (8.26%)    | 478,702 (64.20%)  | 160,874 (21.57%)  |

**Plan: NC CD SL 2025-95, District 08 --****745,671 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 08               | 745,671 (100.00%) | 69,986 (100.00%)  | 453,271 (100.00%) | 137,312 (100.00%) |
| Total and % Population |                   | 69,986 (9.39%)    | 453,271 (60.79%)  | 137,312 (18.41%)  |

**Plan: NC CD SL 2025-95, District 09 --****745,671 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 09               | 745,671 (100.00%) | 94,277 (100.00%)  | 437,637 (100.00%) | 177,432 (100.00%) |
| Total and % Population |                   | 94,277 (12.64%)   | 437,637 (58.69%)  | 177,432 (23.79%)  |

**Plan: NC CD SL 2025-95, District 10 --****745,670 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 10               | 745,670 (100.00%) | 84,946 (100.00%)  | 493,055 (100.00%) | 130,655 (100.00%) |
| Total and % Population |                   | 84,946 (11.39%)   | 493,055 (66.12%)  | 130,655 (17.52%)  |

**Plan: NC CD SL 2025-95, District 11 --****745,670 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl            |
|------------------------|-------------------|-------------------|-------------------|------------------|
| Dist. 11               | 745,670 (100.00%) | 57,087 (100.00%)  | 613,832 (100.00%) | 33,066 (100.00%) |
| Total and % Population |                   | 57,087 (7.66%)    | 613,832 (82.32%)  | 33,066 (4.43%)   |

**Plan: NC CD SL 2025-95, District 12 --****745,670 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 12               | 745,670 (100.00%) | 131,029 (100.00%) | 267,498 (100.00%) | 295,073 (100.00%) |
| Total and % Population |                   | 131,029 (17.57%)  | 267,498 (35.87%)  | 295,073 (39.57%)  |

**Plan: NC CD SL 2025-95, District 13 --****745,670 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Bl             |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 13               | 745,670 (100.00%) | 97,421 (100.00%)  | 470,899 (100.00%) | 149,850 (100.00%) |
| Total and % Population |                   | 97,421 (13.06%)   | 470,899 (63.15%)  | 149,850 (20.10%)  |

**Plan: NC CD SL 2025-95, District 14 --****745,671 Total Population**

|  | Population | [Hispanic Origin] | NH_Wht | AP_Bl |
|--|------------|-------------------|--------|-------|
|--|------------|-------------------|--------|-------|

From Plan: **NC CD SL 2023-145**

**Plan: NC CD SL 2025-95, District 14 --**

**745,671 Total Population**

|                        | Population        | [Hispanic Origin] | NH_Wht            | AP_Black          |
|------------------------|-------------------|-------------------|-------------------|-------------------|
| Dist. 14               | 745,671 (100.00%) | 64,454 (100.00%)  | 504,554 (100.00%) | 128,834 (100.00%) |
| Total and % Population |                   | 64,454 (8.64%)    | 504,554 (67.66%)  | 128,834 (17.28%)  |

## **Appendix C**

### **SL 2023-145 Plan Data Reports**

Total Population #s & %s SL 2023-145 Plan Report  
Voting Age Population #s & %s SL 2023-145 Plan Report  
Citizen Voting Age Population #s & %s SL 2023-145 Plan Report  
Contiguity SL 2023-145 Plan Report  
Compactness SL 2023-145 Plan Report  
County - VTD SL 2023-145 Plan Split Report  
Census Places SL 2023-145 Plan Split Report  
Landmark Area SL 2023-145 Plan Split Report  
Incumbency SL 2023-145 Plan Report  
County List SL 2023-145 Plan Report  
Census Place List SL 2023-145 Plan Report

User: Tony Fairfax

Plan Name: NC CD SL 2023-145

Plan Type: NC Cong Districts

## Population Summary

Friday, October 17, 2025

10:54 PM

| District | Population | Deviation | % Devn. | [Hispanic<br>Origin] | NH_Wht  | NH_Blk  | NH_Ind | NH_Asn |
|----------|------------|-----------|---------|----------------------|---------|---------|--------|--------|
| 01       | 745,670    | -1        | 0.00%   | 56,472               | 358,722 | 293,305 | 5,012  | 5,853  |
| 02       | 745,670    | -1        | 0.00%   | 96,435               | 400,547 | 169,050 | 1,930  | 43,558 |
| 03       | 745,671    | 0         | 0.00%   | 79,115               | 463,854 | 150,509 | 3,358  | 12,069 |
| 04       | 745,671    | 0         | 0.00%   | 85,915               | 395,824 | 146,731 | 1,603  | 80,376 |
| 05       | 745,671    | 0         | 0.00%   | 59,024               | 507,354 | 132,275 | 1,984  | 16,509 |
| 06       | 745,671    | 0         | 0.00%   | 80,826               | 466,399 | 137,415 | 2,411  | 26,904 |
| 07       | 745,671    | 0         | 0.00%   | 61,609               | 478,702 | 142,530 | 16,564 | 9,508  |
| 08       | 745,671    | 0         | 0.00%   | 69,986               | 453,271 | 122,694 | 40,891 | 26,504 |
| 09       | 745,671    | 0         | 0.00%   | 94,277               | 437,637 | 154,852 | 7,450  | 14,240 |
| 10       | 745,670    | -1        | 0.00%   | 84,946               | 493,055 | 115,429 | 1,773  | 19,390 |
| 11       | 745,670    | -1        | 0.00%   | 57,087               | 613,832 | 24,359  | 10,853 | 6,744  |
| 12       | 745,670    | -1        | 0.00%   | 131,029              | 267,498 | 272,149 | 2,001  | 42,199 |
| 13       | 745,670    | -1        | 0.00%   | 97,421               | 470,899 | 132,640 | 3,191  | 8,025  |
| 14       | 745,671    | 0         | 0.00%   | 64,454               | 504,554 | 113,588 | 1,865  | 28,180 |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2023-145

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Population Summary

Friday, October 17, 2025

10:55 PM

| District | Population | Deviation | % Devn. | [% Hispanic Origin] | [% NH_Wht] | [% NH_Blkl] | [% NH_Ind] | [% NH_Asn] |
|----------|------------|-----------|---------|---------------------|------------|-------------|------------|------------|
| 01       | 745,670    | -1        | 0.00%   | 7.57%               | 48.11%     | 39.33%      | 0.67%      | 0.78%      |
| 02       | 745,670    | -1        | 0.00%   | 12.93%              | 53.72%     | 22.67%      | 0.26%      | 5.84%      |
| 03       | 745,671    | 0         | 0.00%   | 10.61%              | 62.21%     | 20.18%      | 0.45%      | 1.62%      |
| 04       | 745,671    | 0         | 0.00%   | 11.52%              | 53.08%     | 19.68%      | 0.21%      | 10.78%     |
| 05       | 745,671    | 0         | 0.00%   | 7.92%               | 68.04%     | 17.74%      | 0.27%      | 2.21%      |
| 06       | 745,671    | 0         | 0.00%   | 10.84%              | 62.55%     | 18.43%      | 0.32%      | 3.61%      |
| 07       | 745,671    | 0         | 0.00%   | 8.26%               | 64.2%      | 19.11%      | 2.22%      | 1.28%      |
| 08       | 745,671    | 0         | 0.00%   | 9.39%               | 60.79%     | 16.45%      | 5.48%      | 3.55%      |
| 09       | 745,671    | 0         | 0.00%   | 12.64%              | 58.69%     | 20.77%      | 1%         | 1.91%      |
| 10       | 745,670    | -1        | 0.00%   | 11.39%              | 66.12%     | 15.48%      | 0.24%      | 2.6%       |
| 11       | 745,670    | -1        | 0.00%   | 7.66%               | 82.32%     | 3.27%       | 1.46%      | 0.9%       |
| 12       | 745,670    | -1        | 0.00%   | 17.57%              | 35.87%     | 36.5%       | 0.27%      | 5.66%      |
| 13       | 745,670    | -1        | 0.00%   | 13.06%              | 63.15%     | 17.79%      | 0.43%      | 1.08%      |
| 14       | 745,671    | 0         | 0.00%   | 8.64%               | 67.66%     | 15.23%      | 0.25%      | 3.78%      |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2023-145

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Population Summary

Friday, October 17, 2025

10:56 PM

| District | Population | Deviation | % Devn. | [18+_Pop] | [H18+_Pop] | [NH18+_Wht] | [NH18+_Blk] | [NH18+_Ind] | [NH18+_Asn] |
|----------|------------|-----------|---------|-----------|------------|-------------|-------------|-------------|-------------|
| 01       | 745,670    | -1        | 0.00%   | 587,318   | 35,824     | 297,776     | 228,397     | 4,038       | 4,654       |
| 02       | 745,670    | -1        | 0.00%   | 584,067   | 64,157     | 332,722     | 129,098     | 1,532       | 34,810      |
| 03       | 745,671    | 0         | 0.00%   | 586,125   | 52,590     | 382,633     | 115,624     | 2,703       | 9,763       |
| 04       | 745,671    | 0         | 0.00%   | 574,606   | 56,330     | 320,577     | 115,856     | 1,250       | 59,465      |
| 05       | 745,671    | 0         | 0.00%   | 596,194   | 38,431     | 421,313     | 103,901     | 1,625       | 12,366      |
| 06       | 745,671    | 0         | 0.00%   | 578,293   | 51,069     | 382,738     | 103,739     | 1,992       | 19,452      |
| 07       | 745,671    | 0         | 0.00%   | 593,673   | 39,354     | 400,999     | 110,017     | 12,778      | 7,627       |
| 08       | 745,671    | 0         | 0.00%   | 563,332   | 44,048     | 358,376     | 92,662      | 30,715      | 18,535      |
| 09       | 745,671    | 0         | 0.00%   | 577,673   | 60,786     | 359,252     | 118,032     | 5,823       | 11,384      |
| 10       | 745,670    | -1        | 0.00%   | 581,822   | 53,640     | 404,468     | 88,958      | 1,420       | 14,229      |
| 11       | 745,670    | -1        | 0.00%   | 609,924   | 37,835     | 516,985     | 19,492      | 7,823       | 5,464       |
| 12       | 745,670    | -1        | 0.00%   | 580,319   | 87,967     | 229,032     | 208,149     | 1,585       | 32,974      |
| 13       | 745,670    | -1        | 0.00%   | 562,248   | 60,116     | 372,444     | 101,501     | 2,512       | 6,313       |
| 14       | 745,671    | 0         | 0.00%   | 579,505   | 42,164     | 410,318     | 85,143      | 1,539       | 20,566      |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2023-145

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Population Summary

Friday, October 17, 2025

10:56 PM

| District | Population | Deviation | % Devn. | [% Hispanic Origin] | [% NH_Wht] | [% NH_Blk] | [% NH_Ind] | [% NH_Asn] |
|----------|------------|-----------|---------|---------------------|------------|------------|------------|------------|
| 01       | 745,670    | -1        | 0.00%   | 7.57%               | 48.11%     | 39.33%     | 0.67%      | 0.78%      |
| 02       | 745,670    | -1        | 0.00%   | 12.93%              | 53.72%     | 22.67%     | 0.26%      | 5.84%      |
| 03       | 745,671    | 0         | 0.00%   | 10.61%              | 62.21%     | 20.18%     | 0.45%      | 1.62%      |
| 04       | 745,671    | 0         | 0.00%   | 11.52%              | 53.08%     | 19.68%     | 0.21%      | 10.78%     |
| 05       | 745,671    | 0         | 0.00%   | 7.92%               | 68.04%     | 17.74%     | 0.27%      | 2.21%      |
| 06       | 745,671    | 0         | 0.00%   | 10.84%              | 62.55%     | 18.43%     | 0.32%      | 3.61%      |
| 07       | 745,671    | 0         | 0.00%   | 8.26%               | 64.2%      | 19.11%     | 2.22%      | 1.28%      |
| 08       | 745,671    | 0         | 0.00%   | 9.39%               | 60.79%     | 16.45%     | 5.48%      | 3.55%      |
| 09       | 745,671    | 0         | 0.00%   | 12.64%              | 58.69%     | 20.77%     | 1%         | 1.91%      |
| 10       | 745,670    | -1        | 0.00%   | 11.39%              | 66.12%     | 15.48%     | 0.24%      | 2.6%       |
| 11       | 745,670    | -1        | 0.00%   | 7.66%               | 82.32%     | 3.27%      | 1.46%      | 0.9%       |
| 12       | 745,670    | -1        | 0.00%   | 17.57%              | 35.87%     | 36.5%      | 0.27%      | 5.66%      |
| 13       | 745,670    | -1        | 0.00%   | 13.06%              | 63.15%     | 17.79%     | 0.43%      | 1.08%      |
| 14       | 745,671    | 0         | 0.00%   | 8.64%               | 67.66%     | 15.23%     | 0.25%      | 3.78%      |

Total Population: 10,439,388

Ideal District Population: 745,671

### Summary Statistics:

Population Range: 745,670 to 745,671

Ratio Range: 0.00

Absolute Range: -1 to

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.43

## Population Summary

---

NC CD SL 2023-145

|                          |       |
|--------------------------|-------|
| Relative Mean Deviation: | 0.00% |
| Standard Deviation:      | 0.49  |

## Contiguity Report

Friday, October 17, 2025

11:01 PM

| District | Number of Distinct Areas |
|----------|--------------------------|
| 01       | 1                        |
| 02       | 1                        |
| 03       | 1                        |
| 04       | 1                        |
| 05       | 1                        |
| 06       | 1                        |
| 07       | 1                        |
| 08       | 1                        |
| 09       | 1                        |
| 10       | 1                        |
| 11       | 1                        |
| 12       | 1                        |
| 13       | 1                        |
| 14       | 1                        |

## Measures of Compactness Report

Friday, October 17, 2025

11:01 PM

|           | Reock | Polsby-Popper |
|-----------|-------|---------------|
| Sum       | N/A   | N/A           |
| Min       | 0.28  | 0.14          |
| Max       | 0.59  | 0.29          |
| Mean      | 0.40  | 0.24          |
| Std. Dev. | 0.09  | 0.05          |

| District | Reock | Polsby-Popper |
|----------|-------|---------------|
| 01       | 0.42  | 0.27          |
| 02       | 0.49  | 0.27          |
| 03       | 0.37  | 0.25          |
| 04       | 0.45  | 0.25          |
| 05       | 0.30  | 0.23          |
| 06       | 0.41  | 0.29          |
| 07       | 0.50  | 0.28          |
| 08       | 0.35  | 0.27          |
| 09       | 0.38  | 0.16          |
| 10       | 0.28  | 0.28          |
| 11       | 0.30  | 0.27          |

|           | <b>Reock</b> | <b>Polsby-Popper</b> |
|-----------|--------------|----------------------|
| Sum       | N/A          | N/A                  |
| Min       | 0.28         | 0.14                 |
| Max       | 0.59         | 0.29                 |
| Mean      | 0.40         | 0.24                 |
| Std. Dev. | 0.09         | 0.05                 |

| <b>District</b> | <b>Reock</b> | <b>Polsby-Popper</b> |
|-----------------|--------------|----------------------|
| 12              | 0.59         | 0.28                 |
| 13              | 0.38         | 0.14                 |
| 14              | 0.32         | 0.17                 |

### Measures of Compactness Summary

|                      |                                                                       |
|----------------------|-----------------------------------------------------------------------|
| <b>Reock</b>         | The measure is always between 0 and 1, with 1 being the most compact. |
| <b>Polsby-Popper</b> | The measure is always between 0 and 1, with 1 being the most compact. |

## Political Subdivision Splits Between Districts

Friday, October 17, 2025

11:02 PM

Number of subdivisions not split:

|                 |       |
|-----------------|-------|
| County          | 89    |
| Voting District | 2,646 |

Number of subdivisions split into more than one district:

|                 |    |
|-----------------|----|
| County          | 11 |
| Voting District | 20 |

Number of splits involving no population:

|                 |   |
|-----------------|---|
| County          | 0 |
| Voting District | 0 |

### Split Counts

#### *County*

Cases where an area is split among 2 Districts: 8

Cases where an area is split among 3 Districts: 3

#### *Voting District*

Cases where an area is split among 2 Districts: 20

| County                 | Voting District | District | Population |
|------------------------|-----------------|----------|------------|
| <i>Split Counties:</i> |                 |          |            |
| Cabarrus NC            |                 | 06       | 101,258    |
| Cabarrus NC            |                 | 08       | 124,546    |
| Chatham NC             |                 | 04       | 40,640     |
| Chatham NC             |                 | 09       | 35,645     |
| Cumberland NC          |                 | 07       | 191,667    |
| Cumberland NC          |                 | 09       | 143,061    |
| Forsyth NC             |                 | 06       | 108,247    |
| Forsyth NC             |                 | 10       | 274,343    |
| Granville NC           |                 | 01       | 10,818     |
| Granville NC           |                 | 13       | 50,174     |
| Guilford NC            |                 | 05       | 264,080    |
| Guilford NC            |                 | 06       | 177,649    |
| Guilford NC            |                 | 09       | 99,570     |
| Mecklenburg NC         |                 | 08       | 117,166    |
| Mecklenburg NC         |                 | 12       | 745,670    |
| Mecklenburg NC         |                 | 14       | 252,646    |
| Polk NC                |                 | 11       | 5,779      |
| Polk NC                |                 | 14       | 13,549     |
| Robeson NC             |                 | 07       | 38,268     |
| Robeson NC             |                 | 08       | 78,262     |
| Sampson NC             |                 | 03       | 46,127     |
| Sampson NC             |                 | 07       | 12,909     |
| Wake NC                |                 | 02       | 745,670    |

# Political Subdivision Splits Between Districts

NC CD SL 2023-145

| County             | Voting District    | District | Population |
|--------------------|--------------------|----------|------------|
| Wake NC            |                    | 04       | 231,502    |
| Wake NC            |                    | 13       | 152,238    |
| <i>Split VTDs:</i> |                    |          |            |
| Cabarrus NC        | 12-13              | 06       | 7,807      |
| Cabarrus NC        | 12-13              | 08       | 199        |
| Chatham NC         | EAST WILLIAMS      | 04       | 1,496      |
| Chatham NC         | EAST WILLIAMS      | 09       | 3,670      |
| Cumberland NC      | CROSS CREEK 14     | 07       | 81         |
| Cumberland NC      | CROSS CREEK 14     | 09       | 4,129      |
| Forsyth NC         | WALKERTOWN LIBRARY | 06       | 466        |
| Forsyth NC         | WALKERTOWN LIBRARY | 10       | 4,161      |
| Granville NC       | 00SALM             | 01       | 1,252      |
| Granville NC       | 00SALM             | 13       | 1,118      |
| Guilford NC        | JEF2               | 05       | 1,034      |
| Guilford NC        | JEF2               | 09       | 3,768      |
| Guilford NC        | NDRI               | 05       | 1,658      |
| Guilford NC        | NDRI               | 06       | 2,323      |
| Mecklenburg NC     | 103                | 08       | 3,454      |
| Mecklenburg NC     | 103                | 12       | 854        |
| Mecklenburg NC     | 121                | 08       | 1,071      |
| Mecklenburg NC     | 121                | 14       | 4,030      |
| Mecklenburg NC     | 217                | 08       | 869        |
| Mecklenburg NC     | 217                | 12       | 3,619      |
| Mecklenburg NC     | 232                | 08       | 567        |
| Mecklenburg NC     | 232                | 14       | 6,741      |
| Polk NC            | WHITE OAK          | 11       | 1,850      |
| Polk NC            | WHITE OAK          | 14       | 452        |
| Robeson NC         | PHILADELPHUS       | 07       | 462        |
| Robeson NC         | PHILADELPHUS       | 08       | 1,761      |
| Sampson NC         | PLAINVIEW          | 03       | 744        |
| Sampson NC         | PLAINVIEW          | 07       | 3,197      |
| Wake NC            | 04-10              | 02       | 1,273      |
| Wake NC            | 04-10              | 04       | 2,691      |
| Wake NC            | 09-02              | 02       | 5,777      |
| Wake NC            | 09-02              | 13       | 647        |
| Wake NC            | 10-03              | 02       | 4,537      |
| Wake NC            | 10-03              | 13       | 154        |
| Wake NC            | 10-04              | 02       | 11,667     |
| Wake NC            | 10-04              | 13       | 1,171      |
| Wake NC            | 16-01              | 02       | 4,020      |
| Wake NC            | 16-01              | 13       | 1,364      |
| Wake NC            | 16-09              | 02       | 5,059      |
| Wake NC            | 16-09              | 13       | 1,648      |

## County by District and by County

Friday, October 17, 2025

11:38 PM

|                          | Population     | % of District |
|--------------------------|----------------|---------------|
| <b>District 01</b>       |                |               |
| Bertie                   | 17,934         | 100.00%       |
| Camden                   | 10,355         | 100.00%       |
| Chowan                   | 13,708         | 100.00%       |
| Currituck                | 28,100         | 100.00%       |
| Edgecombe                | 48,900         | 100.00%       |
| Gates                    | 10,478         | 100.00%       |
| Granville                | 10,818         | 17.74%        |
| Greene                   | 20,451         | 100.00%       |
| Halifax                  | 48,622         | 100.00%       |
| Hertford                 | 21,552         | 100.00%       |
| Lenoir                   | 55,122         | 100.00%       |
| Martin                   | 22,031         | 100.00%       |
| Nash                     | 94,970         | 100.00%       |
| Northampton              | 17,471         | 100.00%       |
| Pasquotank               | 40,568         | 100.00%       |
| Perquimans               | 13,005         | 100.00%       |
| Tyrrell                  | 3,245          | 100.00%       |
| Vance                    | 42,578         | 100.00%       |
| Warren                   | 18,642         | 100.00%       |
| Washington               | 11,003         | 100.00%       |
| Wayne                    | 117,333        | 100.00%       |
| Wilson                   | 78,784         | 100.00%       |
| <b>Total District 01</b> | <b>745,670</b> |               |
| <b>District 02</b>       |                |               |
| Wake                     | 745,670        | 66.02%        |
| <b>Total District 02</b> | <b>745,670</b> |               |
| <b>District 03</b>       |                |               |
| Beaufort                 | 44,652         | 100.00%       |
| Carteret                 | 67,686         | 100.00%       |
| Craven                   | 100,720        | 100.00%       |
| Dare                     | 36,915         | 100.00%       |
| Duplin                   | 48,715         | 100.00%       |
| Hyde                     | 4,589          | 100.00%       |
| Jones                    | 9,172          | 100.00%       |
| Onslow                   | 204,576        | 100.00%       |
| Pamlico                  | 12,276         | 100.00%       |
| Pitt                     | 170,243        | 100.00%       |
| Sampson                  | 46,127         | 78.13%        |
| <b>Total District 03</b> | <b>745,671</b> |               |

|                          | Population     | % of District |
|--------------------------|----------------|---------------|
| <b>District 04</b>       |                |               |
| Chatham                  | 40,640         | 53.27%        |
| Durham                   | 324,833        | 100.00%       |
| Orange                   | 148,696        | 100.00%       |
| Wake                     | 231,502        | 20.50%        |
| <b>Total District 04</b> | <b>745,671</b> |               |
| <b>District 05</b>       |                |               |
| Alexander                | 36,444         | 100.00%       |
| Alleghany                | 10,888         | 100.00%       |
| Ashe                     | 26,577         | 100.00%       |
| Caldwell                 | 80,652         | 100.00%       |
| Guilford                 | 264,080        | 48.79%        |
| Rockingham               | 91,096         | 100.00%       |
| Stokes                   | 44,520         | 100.00%       |
| Surry                    | 71,359         | 100.00%       |
| Watauga                  | 54,086         | 100.00%       |
| Wilkes                   | 65,969         | 100.00%       |
| <b>Total District 05</b> | <b>745,671</b> |               |
| <b>District 06</b>       |                |               |
| Cabarrus                 | 101,258        | 44.84%        |
| Davidson                 | 168,930        | 100.00%       |
| Davie                    | 42,712         | 100.00%       |
| Forsyth                  | 108,247        | 28.29%        |
| Guilford                 | 177,649        | 32.82%        |
| Rowan                    | 146,875        | 100.00%       |
| <b>Total District 06</b> | <b>745,671</b> |               |
| <b>District 07</b>       |                |               |
| Bladen                   | 29,606         | 100.00%       |
| Brunswick                | 136,693        | 100.00%       |
| Columbus                 | 50,623         | 100.00%       |
| Cumberland               | 191,667        | 57.26%        |
| New Hanover              | 225,702        | 100.00%       |
| Pender                   | 60,203         | 100.00%       |
| Robeson                  | 38,268         | 32.84%        |
| Sampson                  | 12,909         | 21.87%        |
| <b>Total District 07</b> | <b>745,671</b> |               |
| <b>District 08</b>       |                |               |
| Anson                    | 22,055         | 100.00%       |
| Cabarrus                 | 124,546        | 55.16%        |
| Mecklenburg              | 117,166        | 10.50%        |
| Montgomery               | 25,751         | 100.00%       |
| Richmond                 | 42,946         | 100.00%       |
| Robeson                  | 78,262         | 67.16%        |

|                          | Population     | % of District |
|--------------------------|----------------|---------------|
| Scotland                 | 34,174         | 100.00%       |
| Stanly                   | 62,504         | 100.00%       |
| Union                    | 238,267        | 100.00%       |
| <b>Total District 08</b> | <b>745,671</b> |               |
| <b>District 09</b>       |                |               |
| Alamance                 | 171,415        | 100.00%       |
| Chatham                  | 35,645         | 46.73%        |
| Cumberland               | 143,061        | 42.74%        |
| Guilford                 | 99,570         | 18.39%        |
| Hoke                     | 52,082         | 100.00%       |
| Moore                    | 99,727         | 100.00%       |
| Randolph                 | 144,171        | 100.00%       |
| <b>Total District 09</b> | <b>745,671</b> |               |
| <b>District 10</b>       |                |               |
| Catawba                  | 160,610        | 100.00%       |
| Forsyth                  | 274,343        | 71.71%        |
| Iredell                  | 186,693        | 100.00%       |
| Lincoln                  | 86,810         | 100.00%       |
| Yadkin                   | 37,214         | 100.00%       |
| <b>Total District 10</b> | <b>745,670</b> |               |
| <b>District 11</b>       |                |               |
| Avery                    | 17,806         | 100.00%       |
| Buncombe                 | 269,452        | 100.00%       |
| Cherokee                 | 28,774         | 100.00%       |
| Clay                     | 11,089         | 100.00%       |
| Graham                   | 8,030          | 100.00%       |
| Haywood                  | 62,089         | 100.00%       |
| Henderson                | 116,281        | 100.00%       |
| Jackson                  | 43,109         | 100.00%       |
| Macon                    | 37,014         | 100.00%       |
| Madison                  | 21,193         | 100.00%       |
| McDowell                 | 44,578         | 100.00%       |
| Mitchell                 | 14,903         | 100.00%       |
| Polk                     | 5,779          | 29.90%        |
| Swain                    | 14,117         | 100.00%       |
| Transylvania             | 32,986         | 100.00%       |
| Yancey                   | 18,470         | 100.00%       |
| <b>Total District 11</b> | <b>745,670</b> |               |
| <b>District 12</b>       |                |               |
| Mecklenburg              | 745,670        | 66.85%        |
| <b>Total District 12</b> | <b>745,670</b> |               |
| <b>District 13</b>       |                |               |

|                          | Population     | % of<br>District |
|--------------------------|----------------|------------------|
| Caswell                  | 22,736         | 100.00%          |
| Franklin                 | 68,573         | 100.00%          |
| Granville                | 50,174         | 82.26%           |
| Harnett                  | 133,568        | 100.00%          |
| Johnston                 | 215,999        | 100.00%          |
| Lee                      | 63,285         | 100.00%          |
| Person                   | 39,097         | 100.00%          |
| Wake                     | 152,238        | 13.48%           |
| <b>Total District 13</b> | <b>745,670</b> |                  |
| <b>District 14</b>       |                |                  |
| Burke                    | 87,570         | 100.00%          |
| Cleveland                | 99,519         | 100.00%          |
| Gaston                   | 227,943        | 100.00%          |
| Mecklenburg              | 252,646        | 22.65%           |
| Polk                     | 13,549         | 70.10%           |
| Rutherford               | 64,444         | 100.00%          |
| <b>Total District 14</b> | <b>745,671</b> |                  |

User: Tony Fairfax

Plan Name: NC CD SL 2023-145

Plan Type: NC Cong Districts

## Communities of Interest (Landscape, 11x8.5)

Friday, October 17, 2025

11:18 PM

| City/Town           | District | Population | %     |
|---------------------|----------|------------|-------|
| Archdale City       | 06       | 130        | 1.1   |
| Archdale City       | 09       | 11,777     | 98.9  |
| Barker Ten Mile CDP | 07       | 129        | 13.8  |
| Barker Ten Mile CDP | 08       | 808        | 86.2  |
| Beech Mountain Town | 05       | 613        | 90.8  |
| Beech Mountain Town | 11       | 62         | 9.2   |
| Candor Town         | 08       | 813        | 100.0 |
| Candor Town         | 09       | 0          | 0.0   |
| Cary Town           | 02       | 84,668     | 48.5  |
| Cary Town           | 04       | 83,005     | 47.5  |
| Cary Town           | 09       | 3,271      | 1.9   |
| Cary Town           | 13       | 3,777      | 2.2   |
| Charlotte City      | 08       | 63,098     | 7.2   |
| Charlotte City      | 12       | 709,319    | 81.1  |
| Charlotte City      | 14       | 102,162    | 11.7  |
| Clemmons Village    | 06       | 13,930     | 65.8  |
| Clemmons Village    | 10       | 7,233      | 34.2  |
| Columbus Town       | 11       | 0          | 0.0   |
| Columbus Town       | 14       | 1,060      | 100.0 |
| Concord City        | 06       | 47,474     | 45.1  |
| Concord City        | 08       | 57,766     | 54.9  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

| City/Town          | District | Population | %    |
|--------------------|----------|------------|------|
| Davidson Town      | 10       | 378        | 2.5  |
| Davidson Town      | 14       | 14,728     | 97.5 |
| Durham City        | 02       | 269        | 0.1  |
| Durham City        | 04       | 283,237    | 99.9 |
| Fayetteville City  | 07       | 79,356     | 38.1 |
| Fayetteville City  | 09       | 129,145    | 61.9 |
| Fuquay-Varina Town | 04       | 12,393     | 36.3 |
| Fuquay-Varina Town | 13       | 21,759     | 63.7 |
| Garner Town        | 02       | 27,258     | 87.5 |
| Garner Town        | 13       | 3,901      | 12.5 |
| Germanton CDP      | 05       | 297        | 37.6 |
| Germanton CDP      | 10       | 493        | 62.4 |
| Greensboro City    | 05       | 224,189    | 75.0 |
| Greensboro City    | 06       | 63,407     | 21.2 |
| Greensboro City    | 09       | 11,439     | 3.8  |
| Grifton Town       | 01       | 147        | 6.0  |
| Grifton Town       | 03       | 2,301      | 94.0 |
| Hickory City       | 05       | 32         | 0.1  |
| Hickory City       | 10       | 43,379     | 99.7 |
| Hickory City       | 14       | 79         | 0.2  |
| High Point City    | 06       | 113,933    | 99.9 |
| High Point City    | 09       | 126        | 0.1  |
| Holly Springs Town | 04       | 35,190     | 85.3 |
| Holly Springs Town | 13       | 6,049      | 14.7 |
| Jamestown Town     | 06       | 7          | 0.2  |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

| City/Town         | District | Population | %    |
|-------------------|----------|------------|------|
| Jamestown Town    | 09       | 3,661      | 99.8 |
| Kannapolis City   | 06       | 52,324     | 98.5 |
| Kannapolis City   | 08       | 790        | 1.5  |
| Kenly Town        | 01       | 198        | 13.3 |
| Kenly Town        | 13       | 1,293      | 86.7 |
| Kernersville Town | 05       | 82         | 0.3  |
| Kernersville Town | 06       | 26,367     | 99.7 |
| Kernersville Town | 10       | 0          | 0.0  |
| King City         | 05       | 6,606      | 91.8 |
| King City         | 10       | 591        | 8.2  |
| Long View Town    | 10       | 4,353      | 85.6 |
| Long View Town    | 14       | 735        | 14.5 |
| Lumberton City    | 07       | 454        | 2.4  |
| Lumberton City    | 08       | 18,571     | 97.6 |
| Matthews Town     | 08       | 25,816     | 87.7 |
| Matthews Town     | 12       | 3,619      | 12.3 |
| Mebane City       | 04       | 3,171      | 17.8 |
| Mebane City       | 09       | 14,626     | 82.2 |
| Mint Hill Town    | 08       | 22,547     | 85.2 |
| Mint Hill Town    | 12       | 3,903      | 14.8 |
| Morrisville Town  | 02       | 10,457     | 35.3 |
| Morrisville Town  | 04       | 19,173     | 64.7 |
| Mount Olive Town  | 01       | 4,193      | 99.9 |
| Mount Olive Town  | 03       | 5          | 0.1  |
| Oxford City       | 01       | 8,485      | 98.3 |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

| City/Town               | District | Population | %     |
|-------------------------|----------|------------|-------|
| Oxford City             | 13       | 143        | 1.7   |
| Pineville Town          | 12       | 2,700      | 25.5  |
| Pineville Town          | 14       | 7,902      | 74.5  |
| Raleigh City            | 02       | 464,574    | 99.3  |
| Raleigh City            | 04       | 1,559      | 0.3   |
| Raleigh City            | 13       | 1,532      | 0.3   |
| Red Springs Town        | 08       | 3,087      | 100.0 |
| Red Springs Town        | 09       | 0          | 0.0   |
| Rhodhiss Town           | 05       | 358        | 35.9  |
| Rhodhiss Town           | 14       | 639        | 64.1  |
| Rolesville Town         | 02       | 5,501      | 58.1  |
| Rolesville Town         | 13       | 3,974      | 41.9  |
| Rougemont CDP           | 04       | 832        | 83.1  |
| Rougemont CDP           | 13       | 169        | 16.9  |
| Rutherford College Town | 05       | 0          | 0.0   |
| Rutherford College Town | 14       | 1,226      | 100.0 |
| Seven Devils Town       | 05       | 275        | 87.9  |
| Seven Devils Town       | 11       | 38         | 12.1  |
| Spivey's Corner CDP     | 03       | 322        | 55.9  |
| Spivey's Corner CDP     | 07       | 254        | 44.1  |
| Stony Point CDP         | 05       | 986        | 86.0  |
| Stony Point CDP         | 10       | 160        | 14.0  |
| Summerfield Town        | 05       | 8,442      | 77.1  |
| Summerfield Town        | 09       | 2,509      | 22.9  |
| Surf City Town          | 03       | 334        | 8.6   |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

| City/Town            | District | Population | %     |
|----------------------|----------|------------|-------|
| Surf City Town       | 07       | 3,533      | 91.4  |
| Thomasville City     | 06       | 26,662     | 98.1  |
| Thomasville City     | 09       | 521        | 1.9   |
| Tobaccoville Village | 05       | 0          | 0.0   |
| Tobaccoville Village | 10       | 2,578      | 100.0 |
| Wake Forest Town     | 02       | 32,623     | 68.5  |
| Wake Forest Town     | 13       | 14,978     | 31.5  |
| Walkertown Town      | 06       | 1,081      | 19.0  |
| Walkertown Town      | 10       | 4,611      | 81.0  |
| Wallace Town         | 03       | 3,413      | 100.0 |
| Wallace Town         | 07       | 0          | 0.0   |
| Wendell Town         | 02       | 9,765      | 99.7  |
| Wendell Town         | 13       | 28         | 0.3   |
| Winston-Salem City   | 06       | 33,949     | 13.6  |
| Winston-Salem City   | 10       | 215,596    | 86.4  |
| Zebulon Town         | 02       | 4,668      | 67.6  |
| Zebulon Town         | 13       | 2,235      | 32.4  |

| City/Town                  | -- Listed by District |      |
|----------------------------|-----------------------|------|
|                            | Population            | %    |
| Grifton Town (part)        | 147                   | 6.0  |
| Kenly Town (part)          | 198                   | 13.3 |
| Oxford City (part)         | 8,485                 | 98.3 |
| <b>District 01 Totals</b>  | <b>339,057</b>        |      |
| Cary Town (part)           | 84,668                | 48.5 |
| Durham City (part)         | 269                   | 0.1  |
| Garner Town (part)         | 27,258                | 87.5 |
| Morrisville Town (part)    | 10,457                | 35.3 |
| Raleigh City (part)        | 464,574               | 99.3 |
| Rolesville Town (part)     | 5,501                 | 58.1 |
| Wake Forest Town (part)    | 32,623                | 68.5 |
| Zebulon Town (part)        | 4,668                 | 67.6 |
| <b>District 02 Totals</b>  | <b>659,218</b>        |      |
| Grifton Town (part)        | 2,301                 | 94.0 |
| Mount Olive Town (part)    | 5                     | 0.1  |
| Spivey's Corner CDP (part) | 322                   | 55.9 |
| Surf City Town (part)      | 334                   | 8.6  |
| <b>District 03 Totals</b>  | <b>412,871</b>        |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

|                                | Population     | %    |
|--------------------------------|----------------|------|
| Cary Town (part)               | 83,005         | 47.5 |
| Fuquay-Varina Town (part)      | 12,393         | 36.3 |
| Holly Springs Town (part)      | 35,190         | 85.3 |
| Mebane City (part)             | 3,171          | 17.8 |
| Morrisville Town (part)        | 19,173         | 64.7 |
| Raleigh City (part)            | 1,559          | 0.3  |
| Rougemont CDP (part)           | 832            | 83.1 |
| <hr/>                          |                |      |
| <b>District 04 Totals</b>      | <b>608,621</b> |      |
| Beech Mountain Town (part)     | 613            | 90.8 |
| Germanton CDP (part)           | 297            | 37.6 |
| Greensboro City (part)         | 224,189        | 75.0 |
| Hickory City (part)            | 32             | 0.1  |
| Kernersville Town (part)       | 82             | 0.3  |
| King City (part)               | 6,606          | 91.8 |
| Rhodhiss Town (part)           | 358            | 35.9 |
| Rutherford College Town (part) | 0              | 0.0  |
| Seven Devils Town (part)       | 275            | 87.9 |
| Stony Point CDP (part)         | 986            | 86.0 |
| Summerfield Town (part)        | 8,442          | 77.1 |
| Tobaccoville Village (part)    | 0              | 0.0  |
| <hr/>                          |                |      |
| <b>District 05 Totals</b>      | <b>415,262</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

|                            | Population     | %    |
|----------------------------|----------------|------|
| Archdale City (part)       | 130            | 1.1  |
| Clemmons Village (part)    | 13,930         | 65.8 |
| Concord City (part)        | 47,474         | 45.1 |
| Greensboro City (part)     | 63,407         | 21.2 |
| Jamestown Town (part)      | 7              | 0.2  |
| Kannapolis City (part)     | 52,324         | 98.5 |
| Thomasville City (part)    | 26,662         | 98.1 |
| Walkertown Town (part)     | 1,081          | 19.0 |
| Winston-Salem City (part)  | 33,949         | 13.6 |
| <b>District 06 Totals</b>  | <b>488,512</b> |      |
| Barker Ten Mile CDP (part) | 129            | 13.8 |
| Fayetteville City (part)   | 79,356         | 38.1 |
| Lumberton City (part)      | 454            | 2.4  |
| Spivey's Corner CDP (part) | 254            | 44.1 |
| Surf City Town (part)      | 3,533          | 91.4 |
| Wallace Town (part)        | 0              | 0.0  |
| <b>District 07 Totals</b>  | <b>428,183</b> |      |
| Barker Ten Mile CDP (part) | 808            | 86.2 |
| Charlotte City (part)      | 63,098         | 7.2  |
| Concord City (part)        | 57,766         | 54.9 |
| Kannapolis City (part)     | 790            | 1.5  |
| Lumberton City (part)      | 18,571         | 97.6 |
| Matthews Town (part)       | 25,816         | 87.7 |
| Mint Hill Town (part)      | 22,547         | 85.2 |
| <b>District 08 Totals</b>  | <b>482,574</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

|                            | Population     | %    |
|----------------------------|----------------|------|
| Archdale City (part)       | 11,777         | 98.9 |
| Candor Town (part)         | 0              | 0.0  |
| Cary Town (part)           | 3,271          | 1.9  |
| Fayetteville City (part)   | 129,145        | 61.9 |
| Greensboro City (part)     | 11,439         | 3.8  |
| High Point City (part)     | 126            | 0.1  |
| Mebane City (part)         | 14,626         | 82.2 |
| Red Springs Town (part)    | 0              | 0.0  |
| Summerfield Town (part)    | 2,509          | 22.9 |
| Thomasville City (part)    | 521            | 1.9  |
| <b>District 09 Totals</b>  | <b>434,873</b> |      |
| Clemmons Village (part)    | 7,233          | 34.2 |
| Davidson Town (part)       | 378            | 2.5  |
| Germanton CDP (part)       | 493            | 62.4 |
| Kernersville Town (part)   | 0              | 0.0  |
| King City (part)           | 591            | 8.2  |
| Long View Town (part)      | 4,353          | 85.6 |
| Stony Point CDP (part)     | 160            | 14.0 |
| Walkertown Town (part)     | 4,611          | 81.0 |
| Winston-Salem City (part)  | 215,596        | 86.4 |
| <b>District 10 Totals</b>  | <b>471,358</b> |      |
| Beech Mountain Town (part) | 62             | 9.2  |
| Columbus Town (part)       | 0              | 0.0  |
| Seven Devils Town (part)   | 38             | 12.1 |
| <b>District 11 Totals</b>  | <b>285,599</b> |      |

## Communities of Interest (Landscape, 11x8.5)

NC CD SL 2023-145

|                           | Population     | %    |
|---------------------------|----------------|------|
| Charlotte City (part)     | 709,319        | 81.1 |
| Matthews Town (part)      | 3,619          | 12.3 |
| Mint Hill Town (part)     | 3,903          | 14.8 |
| Pineville Town (part)     | 2,700          | 25.5 |
| <b>District 12 Totals</b> | <b>719,541</b> |      |
| Cary Town (part)          | 3,777          | 2.2  |
| Fuquay-Varina Town (part) | 21,759         | 63.7 |
| Garner Town (part)        | 3,901          | 12.5 |
| Holly Springs Town (part) | 6,049          | 14.7 |
| Kenly Town (part)         | 1,293          | 86.7 |
| Oxford City (part)        | 143            | 1.7  |
| Raleigh City (part)       | 1,532          | 0.3  |
| Rolesville Town (part)    | 3,974          | 41.9 |
| Rougemont CDP (part)      | 169            | 16.9 |
| Wake Forest Town (part)   | 14,978         | 31.5 |
| Wendell Town (part)       | 28             | 0.3  |
| Zebulon Town (part)       | 2,235          | 32.4 |
| <b>District 13 Totals</b> | <b>243,136</b> |      |
| Charlotte City (part)     | 102,162        | 11.7 |
| Davidson Town (part)      | 14,728         | 97.5 |
| Hickory City (part)       | 79             | 0.2  |
| Long View Town (part)     | 735            | 14.5 |
| Pineville Town (part)     | 7,902          | 74.5 |
| Rhodhiss Town (part)      | 639            | 64.1 |
| Spencer Mountain Town     | 0              | 0.0  |
| <b>District 14 Totals</b> | <b>471,753</b> |      |



---

**Summary Statistics**

|                                |     |
|--------------------------------|-----|
| Number of City/Town not split  | 723 |
| Number of City/Town split      | 53  |
| Number of City/Town split in 2 | 47  |
| Number of City/Town split in 3 | 5   |
| Number of City/Town split in 4 | 1   |
| Total number of splits         | 113 |

## **Appendix D**

NC County's BVAP and %

**North Carolina Counties  
Black Voting Age Population and %**

| <b>Name</b>   | <b>BVAP</b> | <b>BVAP%</b> |
|---------------|-------------|--------------|
| Alamance NC   | 27,878      | 20.81%       |
| Alexander NC  | 1,816       | 6.20%        |
| Alleghany NC  | 122         | 1.36%        |
| Anson NC      | 8,079       | 45.27%       |
| Ashe NC       | 171         | 0.78%        |
| Avery NC      | 718         | 4.75%        |
| Beaufort NC   | 8,283       | 23.01%       |
| Bertie NC     | 9,001       | 60.43%       |
| Bladen NC     | 7,894       | 33.70%       |
| Brunswick NC  | 9,916       | 8.50%        |
| Buncombe NC   | 13,666      | 6.22%        |
| Burke NC      | 4,485       | 6.41%        |
| Cabarrus NC   | 33,110      | 19.76%       |
| Caldwell NC   | 3,506       | 5.44%        |
| Camden NC     | 935         | 11.86%       |
| Carteret NC   | 3,036       | 5.40%        |
| Caswell NC    | 5,964       | 32.07%       |
| Catawba NC    | 11,181      | 8.83%        |
| Chatham NC    | 6,941       | 11.42%       |
| Cherokee NC   | 404         | 1.68%        |
| Chowan NC     | 3,569       | 32.11%       |
| Clay NC       | 80          | 0.87%        |
| Cleveland NC  | 16,017      | 20.53%       |
| Columbus NC   | 12,073      | 29.95%       |
| Craven NC     | 16,661      | 20.88%       |
| Cumberland NC | 103,168     | 40.54%       |
| Currituck NC  | 1,279       | 5.81%        |
| Dare NC       | 705         | 2.32%        |
| Davidson NC   | 13,115      | 9.92%        |
| Davie NC      | 2,163       | 6.40%        |
| Duplin NC     | 9,428       | 25.45%       |
| Durham NC     | 92,051      | 35.46%       |
| Edgecombe NC  | 21,540      | 56.40%       |
| Forsyth NC    | 77,426      | 26.04%       |
| Franklin NC   | 13,059      | 24.57%       |
| Gaston NC     | 31,549      | 17.74%       |
| Gates NC      | 2,622       | 31.43%       |
| Graham NC     | 81          | 1.27%        |
| Granville NC  | 15,407      | 31.97%       |
| Greene NC     | 6,175       | 37.28%       |
| Guilford NC   | 146,078     | 34.47%       |
| Halifax NC    | 20,135      | 51.66%       |
| Harnett NC    | 21,657      | 22.08%       |
| Haywood NC    | 758         | 1.48%        |
| Henderson NC  | 3,161       | 3.35%        |

**North Carolina Counties  
Black Voting Age Population and %**

| <b>Name</b>     | <b>BVAP</b> | <b>BVAP%</b> |
|-----------------|-------------|--------------|
| Hertford NC     | 10,111      | 57.32%       |
| Hoke NC         | 13,473      | 35.95%       |
| Hyde NC         | 1,073       | 28.35%       |
| Iredell NC      | 17,388      | 12.09%       |
| Jackson NC      | 1,057       | 2.95%        |
| Johnston NC     | 26,787      | 16.73%       |
| Jones NC        | 2,229       | 29.80%       |
| Lee NC          | 8,878       | 18.35%       |
| Lenoir NC       | 17,369      | 40.47%       |
| Lincoln NC      | 3,975       | 5.81%        |
| Macon NC        | 355         | 1.17%        |
| Madison NC      | 295         | 1.69%        |
| Martin NC       | 7,218       | 40.98%       |
| McDowell NC     | 1,654       | 4.62%        |
| Mecklenburg NC  | 265,577     | 30.88%       |
| Mitchell NC     | 87          | 0.71%        |
| Montgomery NC   | 3,475       | 17.22%       |
| Moore NC        | 9,011       | 11.52%       |
| Nash NC         | 29,361      | 39.37%       |
| New Hanover NC  | 23,247      | 12.63%       |
| Northampton NC  | 7,937       | 55.23%       |
| Onslow NC       | 24,134      | 15.33%       |
| Orange NC       | 14,231      | 11.91%       |
| Pamlico NC      | 1,896       | 18.10%       |
| Pasquotank NC   | 11,738      | 36.72%       |
| Pender NC       | 6,583       | 14.12%       |
| Perquimans NC   | 2,288       | 21.60%       |
| Person NC       | 8,086       | 26.12%       |
| Pitt NC         | 47,241      | 35.71%       |
| Polk NC         | 651         | 4.02%        |
| Randolph NC     | 7,493       | 6.67%        |
| Richmond NC     | 10,143      | 30.52%       |
| Robeson NC      | 21,416      | 24.21%       |
| Rockingham NC   | 14,158      | 19.45%       |
| Rowan NC        | 18,628      | 16.20%       |
| Rutherford NC   | 5,109       | 9.94%        |
| Sampson NC      | 11,568      | 25.74%       |
| Scotland NC     | 10,379      | 38.66%       |
| Stanly NC       | 5,810       | 11.79%       |
| Stokes NC       | 1,553       | 4.31%        |
| Surry NC        | 2,322       | 4.11%        |
| Swain NC        | 147         | 1.34%        |
| Transylvania NC | 979         | 3.59%        |
| Tyrrell NC      | 787         | 30.58%       |
| Union NC        | 21,542      | 12.39%       |

**North Carolina Counties  
Black Voting Age Population and %**

| Name          | BVAP    | BVAP%  |
|---------------|---------|--------|
| Vance NC      | 16,430  | 49.98% |
| Wake NC       | 169,734 | 19.73% |
| Warren NC     | 7,537   | 49.29% |
| Washington NC | 4,241   | 47.92% |
| Watauga NC    | 2,378   | 5.10%  |
| Wayne NC      | 28,806  | 31.83% |
| Wilkes NC     | 2,394   | 4.55%  |
| Wilson NC     | 23,897  | 39.14% |
| Yadkin NC     | 984     | 3.34%  |
| Yancey NC     | 149     | 0.99%  |

Source: U.S. Census Bureau 2020 Census Data -  
Mapititude County Layer

## **Appendix E**

Anthony E Fairfax Updated Resume

## Anthony “Tony” Fairfax

16 Castle Haven Road, Hampton, Virginia 23666

Office Telephone: (757) 838-3881

Email: fairfax@censuschannel.com

### Experience Highlights:

---

- Demographic, Geographic & Voter Data Analysis
- Multiple GIS Software/Census Data Skillsets
- Redistricting Plan Development & Analysis
- Gingles I & Racial Gerrymandering Analysis
- Redistricting Expert Reports & Testimony
- Redistricting Presentations & Training
- ESRI ArcGIS Map Applications & Dashboards
- Maptitude for Redistricting Proficiency

### Education:

---

Master of Geospatial Information Science and Technology (2016)  
North Carolina State University, Raleigh, North Carolina

Graduate Certificate in Geographic Information Systems (2016)  
North Carolina State University, Raleigh, North Carolina

Bachelor of Science Degree in Electrical Engineering (1982)  
Virginia Tech, Blacksburg, Virginia

### Work Experience:

---

#### **CensusChannel LLC, Hampton, VA (2009 - Present)**

CEO & Principal Consultant - Providing overall project management and operations as well as primary consulting services for clients. Also responsible for customer acquisition and support. Core tasks include GIS-centered services centering on redistricting support (extensive use and analysis of traditional redistricting principles); demographic/socioeconomic, geographic, and voting data; GIS, Census Data, and Redistricting training; GIS data processing/conversion; expert redistricting plan development, analysis, depositions, testimony, and training. Major clientele and projects include:

- **NAACP, Baltimore, MD (2025 - Present)** - Providing redistricting consulting services centered on analyzing multiple states' mid-decade congressional redistricting efforts by the major parties.
- **City of Anderson, IN (2024 - 2025)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the city. Efforts centered on developing new redistricting plan options for the city. The city ultimately approved the final plan that was developed.
- **Southern Poverty Law Center (SPLC), Montgomery, AL (2023 - 2024)** - Providing redistricting training for SPLC participants covering a wide range of subjects from basic traditional redistricting criteria to *Gingles 1* preconditions to Maptitude for Redistricting application.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2023 - Present)** - Providing expert reports and/or deposition for redistricting court cases in Georgia, North Carolina, and Texas.
- **Davies & Rouco, LLP, Birmingham, AL (2023 – Present)** - Providing expert reports, analysis, illustrative plans, and testimony on Jefferson County commissioner's redistricting court case.
- **Wisconsin Department of Justice, Madison, WI (2023 – 2024)** – Provided expert report, analysis, and remedial plan for Wisconsin's State Assembly and Senate District plans.

- **NAACP Legal Defense Fund (LDF), New York, NY (2022 – Present)** – Providing expert reports, analysis, illustrative and remedial plans, depositions, and testimony for two Louisiana congressional redistricting court cases.
- **The ACLU, New York, NY (2022 – Present)** – Providing expert report, analysis, and illustrative plans for state senate redistricting court case in the state of Alabama.
- **Southern Echo, Jackson, MS (2018 - Present)** – Providing ongoing map-related educational and voting-related products pertaining to the state of Mississippi. Previously provided redistricting training sessions to Southern Echo partners throughout the south. Also provided GIS data, maps, and training to Southern Echo, community leaders, stakeholders, and subsequently in the field to groups working in the following states: Alabama, Arkansas, Georgia, Florida, Louisiana, Mississippi, New Mexico, North Carolina, South Carolina, and Texas. Specifically, deliverables include map-centered projects centering on education, GOTV, and redistricting.
- **Town of Cheverly, MD (2022 – 2024)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the town. Efforts centered on developing new redistricting plan options for the town.
- **U.S. Department of Justice, Washington DC (2022 – 2023)** – Provided expert report, illustrative plan, deposition, and testimony for Galveston County, TX redistricting court case.
- **City of Baltimore, MD Office of Council President (2022 - 2023)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the city’s Office of Council President. Efforts center on the alternative development of redistricting plans for the city.
- **Harvard Election Law Clinic (2022 - 2023)** – Provided expert report for Jacksonville, FL, city council and Duval County, FL, school board racial gerrymandering redistricting court case.
- **My Brother’s Keeper Alliance, Chicago, IL (2022)** – Provided demographic and socioeconomic analysis of select neighborhood communities.
- **The ACLU, New York, NY (2021 – 2023)** – Provided expert report, analysis, illustrative plans, depositions, and testimony for redistricting court cases in the states of Arkansas and California.
- **The Power Coalition for Equity and Justice, New Orleans, LA (2021 - 2022)** - Provided technical advice and input for building an equitable redistricting process in Louisiana for communities, legislators, and organizations. Providing analysis and plan alternatives for the Louisiana state legislative House and Senate districts where Black voters could elect a candidate of choice.
- **Crescent City Media Group, New Orleans, LA (2021)** – Provided redistricting training to the PreRedistricting Lab. Training centered on various educational presentations and hands-on sessions for community leaders and local/state legislators.
- **Bondurant, Mixson & Elmore LLP, Atlanta, GA (2021)** – Provided statewide redistricting plan development for Georgia congressional districts. Tasks included being part of a three-member map-drawing team that developed the proposed plan for the Georgia House and Senate Democratic caucus.
- **NAACP Legal Defense Fund (LDF), New York, NY (2020 – 2022)** - Provided redistricting development and analysis of various district configurations for city, county, and state-level plans.
- **Crowd Academy [an SCSJ-sponsored effort], Durham, NC (2020 - 2021)** - Provided redistricting training and support. Training centered on presentations on “How the Lines are Drawn,” which focuses on pre-plan development and plan development activities of redistricting. The target attendees included individuals in Georgia, North Carolina, South Carolina, Tennessee, and Texas. The effort also includes providing mentorship to Academy Fellows and Academy Mentors.

- **City of Everett, WA, Everett, WA (2020)** – Provided advice, consultation, and mapping services as Districting Master to the city of Everett, WA’s Districting Commission. Efforts centered on the development of the city’s first districting plan. Also assisted with answering questions at public forums and developed an ArcGIS web map application for public access to all plans.
- **NAACP, Baltimore, MD (2018 - 2022)** – Provided GIS consulting services via the NAACP (as fiscal agent) to the *Racial Equity Anchor Collaborative* (consisting of the Advancement Project, APIA Health Forum, Demos, Faith in Action, NAACP, National Urban League, NCAI, Race Forward, and Unidos U.S.). Efforts include developing the Racial Equity 2020 Census Data Hub. The Data Hub used ESRI’s Hub Cloud platform, which centralized web maps, mapping applications, and dashboards, enabling collaborative partners to locate hard-to-count areas by major race or ethnicity.
- **Campaign Legal Center, Washington, DC (2018 –2021)** – Developed illustrative redistricting plans, associated expert reports, depositions, and testimony in the *Holloway v City of Virginia Beach* court case. The Illustrative plans included two majority Hispanic, Black, and Asian combined districts to provide evidence of the first prong of *Gingles* for the city of Virginia Beach.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2015 - 2018)** - Provided several expert reports, depositions, and testimony for multiple redistricting court cases in North Carolina. Testimony, depositions, and reports included numerous plans at the congressional, state Senate, state House, and local jurisdiction levels. Analyses covered specific district characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.
- **The Rehab Crew, Durham, NC (2017)** - Provided geospatial & demographic analysis as well as website development and the creation of a proprietary application for the use of targeting real estate investment properties.
- **Congressman G.K. Butterfield, NC (2016 & 2021)** - Developed several congressional district plan alternatives for the State of North Carolina. Provided analyses on alternative district configurations.
- **Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)** - Developed state Senate and House redistricting plans for the state of Alabama in response to the *ADC v Alabama* court case. Also, a series of thematic maps depicting areas added from the previous plan to the enacted plan was provided, showing concentrations of African American voters added to the enacted plan.
- **Net Communications, Tallahassee, FL (2014 - 2015)** - Generated offline mapping and online web services (ArcGIS.com) of the client’s energy company’s resources and organizational assets. Mapping included the energy company’s demographic, socioeconomic, and other resources.
- **National NAACP Office of General Counsel, Baltimore, MD (2012 - 2013)** - Provided project management and developmental support for the creation of a final report for the NAACP National Redistricting Project. Provided planning, organizing, supplemental writing, and interfacing with graphics entity for the complete development of the final report.
- **Congressional Black Caucus Institute (CBC Institute), Washington, DC (2011 - 2012)** - Provided contract duties as the Project Director and Consulting Demographer for the CBC Institute’s Redistricting Project. Provided project management, redistricting plan development, review, analysis, advice, and answers to various questions pertaining to redistricting plans, principles, and processes. The focus included districts where Black voters could elect a candidate of their choice.
- **Mississippi NAACP, Jackson, MS (2011)** - Developed state Senate plans and analyzed enacted plans that the State Court developed.
- **African American Redistricting Collaborative (AARC) of California, Los Angeles, CA (2011)** - Provided demographic and redistricting contracted services. Responsible for developing

congressional, state Senate, and state assembly plans for the collaborative. Special focus was given to the southern Los Angeles area (SOLA) and the Bay Area region. In addition to plan development, several socioeconomic maps were developed to show various communities of interest commonalities.

Also, developed a demographic profile using maps and reports of California's congressional, state Senate, and state Assembly districts for the purpose of preparing for the redistricting plan development process by identifying areas of growth throughout the state. The profiles included data from the American Community Survey (ACS) 2005-2009 and the 2010 Census.

- **The Advancement Project, Washington, DC (2011)** - Provided redistricting plan development services and training. Included was the development of a base map for a new seven (7) district plan in New Orleans that was further developed by community groups in Louisiana. The second effort included training a staff person in the use of Maptitude for Redistricting and in various redistricting scenarios.
- **Louisiana Legislative Black Caucus (LLBC), Baton Rouge, LA (2011)** - Provided redistricting plan development services. Responsibilities included supporting Caucus members' efforts to develop redistricting plans for the state House, state Senate, and Congress. Developed or analyzed over eighty different redistricting plans. The effort also included testifying before the Louisiana Senate Governmental Affairs Committee.
- **Community Policy Research & Training Institute (One Voice), Jackson, MS (2011)** - Developed the Mississippi State Senate plan, along with appropriate reports and a large-scale map.
- **National Black Caucus of State Legislators (NBCSL), Washington, DC (2010)** - Provided services as the Project Director for a 2010 census outreach effort. Developed proposal and managed personnel to generate and execute a strategy to utilize Black state Senate and House legislators to place targeted posters in select hard-to-count (HTC) areas throughout the country.
- **Duke University's Center for REGSS & SCSJ, Durham, NC (2010 - 2011)** - Contracted to serve as one of two Project Coordinators to support an expert preparation workshop hosted by Duke University's REGSS and the SCSJ.

Project Coordinator duties included developing, managing, and providing hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers from across the country on all aspects of redistricting plan development and the principles underlying it. Also, two hands-on redistricting scenarios were created to train large audiences on the plan development process.

### **Democracy South, Virginia Beach, VA (2004 - 2008)**

Senior Technical Consultant - Provided technical, GIS mapping, data analysis, and management support for several projects and civic engagement-related efforts. Significant project efforts included:

- Senior Technical Consultant for the National Unregistered Voter Map. Developed a web-based interactive map that allowed visitors to view state/county-level information pertaining to the number of unregistered voters (2009)
- Co-Director of the Hampton Roads Missing Voter Project (a nonpartisan nonprofit voter engagement effort to increase voter participation with a focus on underrepresented population groups). The effort covered the seven major independent cities in Hampton Roads. Responsibilities included co-managing the overall civic engagement effort and were solely responsible for integrating and processing Catalist voter data into targeting maps and walk lists for all focus areas. Directly Responsible for overseeing the operations in Hampton, Newport News, Portsmouth, and Suffolk, Virginia (2008)

- Senior Technical Consultant for Civic Engagement Efforts. Provided telephone technical voter database support to 17 USAction state partners in 2004; and 12 USAction state partners in 2006. Trained client on VBASE voter data software; Performed voter data conversion; and voter targeting assistance.

### **Congressional Black Caucus Institute, Redistricting Project, Washington, DC (2001 - 2003)**

Consulting Demographer - Provided services that included the development, review, and analysis of over 75 congressional district plans. Responsible for all setup and configuration of hardware and GIS software, and performed all development and analyses of redistricting plans. Congressional district plans were developed for 22 states. Also, performed as a redistricting expert advisor in a consolidated U.S. District Court Voting Rights case in Alabama.

### **National Voter Fund, Washington, DC (2000)**

GIS Consultant (in a consulting partnership of Hagens & Fairfax) - Developed hundreds of precinct targeting maps for a civic engagement effort designed to increase the turnout in the November 2000 election. Efforts included geocoding voter data, integrating census data, and precinct mapping.

### **Norfolk State University, Poli. Science & Computer Science Dept., Norfolk, Virginia (1996 - 2001)**

Adjunct Faculty - Provided instruction to students for BASIC Programming, Introduction to Computer Science, and Computer Literacy courses.

### **GeoTek. Inc. (formally GIS Associates), Virginia Beach, VA (1992 - 1995)**

Consultant and Co-owner - Provided geodemographic research and analysis; client technical & training support; hardware/software system installation; and redistricting manual/ brochure development. Major clients and tasks included:

- New York City Housing Authority - Redistricting Training
- Maryland State Office of Planning - Redistricting Tech Support
- City of Virginia Beach, VA Planning Dept. - Redistricting Training/Tech Support
- City of Norfolk, VA Registrar - Redistricting Training/Tech Support
- City of Chesapeake, VA Registrar - Precinct Realignment

### **Norfolk State University, Political Science Dept., Norfolk, Virginia (1991 - 1999)**

GIS Consultant - Provided a variety of geographic and demographically related tasks. Major Redistricting-related tasks included:

- Installed and operated the LogiSYS ReapS software that was used to perform the bulk of redistricting plans. Performed the intricate ReapS processing of the U.S. Census Bureau Topographically Integrated Geographic Encoded Referencing (TIGER) line files, Public Law 94-171 (PL94-171) demographic data, and the STF socioeconomic data series.
- Developed over 200 redistricting plans, located in over 60 jurisdictions, in the states of Florida, Louisiana, North Carolina, Texas, and Virginia. Developed plans from city/county to legislative to congressional district.
- Traveled to and trained several university faculty personnel on setting up and utilizing the ReapS redistricting system. Also, trained on redistricting plan development principles.

Major GIS-related tasks included:

- Performed a study commissioned by the U.S. Department of Transportation to analyze the ethnic differences in commuting behavior. This study extensively used the Summary Tape File 3A (STF3A) and the Public Use Microdata Sample (PUMS) to identify, map, and report the frequency and average travel time to and from work for Miami, FL MSA; Kansas City, MO-KS MSA; and Detroit, MI MSA.
- Performed a study funded by the City of Norfolk, VA, and NSU School of Business that determined and analyzed the trade area of a section located in Norfolk, VA. Major duties included geocoding customer addresses, producing address-point maps, and developing demographic reports for the project.
- Performed a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to revitalize a neighborhood located in Norfolk, VA. The purpose of the GIS component was to first establish a socioeconomic baseline, then track the progress of the revitalized area, as well as select surrounding areas. Geocoded address locations, generated points, and demographic thematic maps, and produced reports of the target areas.
- Provided demographic analysis of proposed newly incorporated areas in Florida for local Florida civic organizations.

**Cooperative Hampton Roads Org. for Minorities in Engineering, Norfolk, VA (1991 - 1992)**

Computer Consultant - Designed and developed a menu-driven student database, used to track hundreds of minority Junior High and High School students who were interested in pursuing science or engineering degrees.

**Norfolk State University, School of Education, Norfolk, VA (1990 - 1991)**

Technical Consultant/Computer Lab Manager- Provided a variety of support, including hardware and software installation, faculty workshops, course instruction, Network Administrator, and technical support.

**Engineering and Economics Research (EER) Systems (1989)**

Technical Consultant - Coordinated and participated in writing, editing, and formatting technical test documents; played a central role in the development of the Acceptance Test Procedures for the initial phase of a multi-million dollar Combat Maneuver Training Complex (CMTC) in Hohenfels, Germany; and was responsible for the final review and editing of all test documentation.

**Executive Training Center (ETC). Newport News, VA (1988 - 1989)**

Vice President & Co-founder - Managed over 11 part-time and full-time employees; assisted in developing and implementing company policies; performed the duties of the Network Administrator for a Novell-based computer training network; and taught several courses by substituting for instructors when necessary.

**Engineering & Economics Research (EER) Systems. Newport News, VA (1986 - 1987)**

Hardware Design Engineer and Electronics Engineer - Provided engineering and select project management support for the development of the following million/multi-million dollar project efforts:

- Baseline Cost Estimate (BCE) to be used in the procurement of the Combat Maneuver Training Complex - Instrumentation System (CMTC-IS)
- Operational and Maintenance (O&M) Support Plan at the National Training Center (NTC)
- Quality Assurance Surveillance Plan for the O&M Support Plan at the NTC; Configuration Management Plan for CMTC

- Requirements Operational Capabilities (ROC) Analysis for an instrumentation System at the U.S. Army Ranger School, Georgia
- ROC Analysis for an Instrumentation System at Fort Chaffee, Arkansas
- Suggested Statement of Work for the Digital Data Entry Device (DDED); and the Concept Formulation Package and Requirements Definition to Support Interface and Integration of Red Flag at the NTC
- Phase II of a multi-million dollar GIS-based concept test demonstration. Performing as Assistant Test Director (ATD) - liaison between the Government Director Army Ranges and Targets (DART) personnel and EER Systems' personnel; and assumed the role of Test Director when required (1987)
- Suggested Statement of Work (SOW) for a \$1 million procurement of Multivehicle Player Units (MVPUs) at the NTC. Performed as Project Task Manager for a team of engineers, computer programmers, and technical support personnel in the development of a position location player unit for the Army (1986)

#### **Teledyne Hastings-Raydist, Hampton, VA (1982 - 1986)**

Hardware Design Engineer - Designed and developed custom flow and vacuum measuring products; Project Manager for the production and completion of a \$.25 million flow measuring system; Electrical Engineer - Chiefly responsible for developing special products for customers.

### **Major Litigation Clients & Testimony Related Efforts:**

---

#### **Southern Coalition for Social Justice [SCSJ], Durham, NC (2023 - Present)**

Provided expert report and illustrative plan for *Berger v. North Carolina State Conference of the NAACP* vote dilution case. Included expert report and deposition. Also provided an expert report and an illustrative plan for *Finn v. Cobb County Board of Elections*, a racial gerrymandering school board redistricting court case in Cobb County, Georgia. Developed supporting maps and population tables reflecting shifts in racial population from the prior plan to the adopted plan.

#### **Davies & Rouco, LLP, Birmingham, AL (2023 – Present)**

Developed expert report, illustrative plans, and provided deposition and testimony for Jefferson County's *Addoh-Kondi et al v. Jefferson County Commission* racial gerrymander redistricting court case. Developed supporting maps and population tables reflecting shifts in racial population from the prior plan to the adopted plan.

**Wisconsin Department of Justice, Madison, WI (2023 – 2024)** – Provided expert report, analysis, and remedial plan for *Clarke v. Wisconsin Elections Commission (WEC)* violation of the Wisconsin Constitution's contiguity requirement redistricting court case. The effort included Wisconsin's State Assembly and Senate District Plans.

#### **NAACP Legal Defense Fund (LDF), New York, NY (2022 – Present)**

Developed illustrative and remedial plans, expert reports, and provided deposition and testimony for Louisiana's *Ardoin v. Robinson* congressional redistricting vote dilution court case.

#### **The ACLU, New York, NY (2022 – Present)**

Developed expert report, analysis, and illustrative plans, and provided deposition and testimony for the *Alabama NAACP v. Allen* vote dilution state senate redistricting court case in the state of Alabama.

#### **Election Law Clinic at Harvard Law School, Cambridge, MA (2022 - 2023)**

Developed a declaration for the *Jacksonville Branch of the NAACP v. City of Jacksonville* racial gerrymandering redistricting court case. The declaration centered on "Core Retention" analysis tables

presenting the demographic change in population of Duval County, FL, school board districts from the previously approved plan to the recently enacted plan. Also, the same case the prior year involved developing an expert report that contained a series of thematic and demographic maps and table analyses for Jacksonville, FL City Council districts, providing evidence of racial gerrymandering.

**ACLU of Southern California, Los Angeles, CA (2022 – 2023)**

Developed an illustrative redistricting plan and associated expert report for the *Inland Empire United et al v. Riverside County et al* redistricting court case. The Illustrative plan included a second additional majority Latino district as opposed to the county's plan of one.

**U.S. Department of Justice, Washington DC (2022 – 2023)**

Developed an illustrative redistricting plan and associated expert report for the *Petteway et al v Galveston County* redistricting court case. The Illustrative plan included the “Least Change” approach to bring the plan within acceptable deviation. The plan continued to contain a majority Black and Latino district as opposed to the state's plan. The plan, report, and deposition provided evidence of the first prong in *Gingles*.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2022 – Present).**

Developed an expert report that included opinions on the state's expert report in the *LULAC et al v. Abbott* Texas state legislative redistricting court case. The report responded to any conclusions by the State's expert regarding minority vote dilution, specifically concerning the Fair Maps proposed plans.

**NAACP LDF, New York, New York, NY (2022 - Present)**

Developed an illustrative redistricting plan and associated expert report for the *Robinson v. Ardoin* redistricting court case. The Illustrative plan included a second, majority-Black district, unlike the state's plan. The plan, report, and testimony provided evidence of the first prong of *Gingles*, proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

**ACLU, New York, New York, NY (2021 – 2024)**

Developed an illustrative redistricting plan and associated expert report for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* preliminary injunction case. The Illustrative plan included five additional majority-Black districts, as opposed to the Board of Apportionment plan. The plan, report, and testimony provided evidence of the first prong in *Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

**Campaign Legal Center, Washington, DC (2018 – 2020)**

Developed multiple illustrative redistricting plans and associated expert reports for *Latasha Holloway v City of Virginia Beach* court case. The Illustrative Plans included two majority Hispanic, Black, and Asian combined (Coalition) districts to provide evidence of the first prong in *Gingles* in the section 2 court case. The effort included an additional rebuttal, supplemental report, deposition, and testimony.

**Virginia NAACP, Richmond, VA (2018)**

Developed a statewide remedial plan for *Bethune-Hill v. Virginia State Bd. of Elections*. The plan corrected 11 unconstitutional, racially gerrymandered state House districts in the Richmond, Peninsula, and Southside Hampton Roads areas.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2018)**

Developed a demonstrative remedial redistricting plan and associated expert report, as well as provided a deposition for *North Carolina State Conference of NAACP Branches v. Lewis* Wake County Superior Court case. The demonstrative remedial plan corrected the two Wake County, N.C. House Districts declared by a federal court to be racially gerrymandered districts (HD33 & HD38). The expert report not only discussed my results but also offered the Court insight into how a map drawer would reasonably go about fixing

racially gerrymandered districts while still complying with the state constitution's prohibition on mid-decade redistricting.

**Texas NAACP, San Antonio, TX, (2017)**

Provided expert report, deposition, and testimony for the *Perez v. Abbott* US Federal District Court Case. Analyses focused on specific redistricting criteria, including population deviation, compactness, political subdivision splits, and communities of interest for congressional and House plans. Additional analysis was performed on demographic projections for certain congressional and State House districts.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2015 - 2016)**

Provided expert testimony, deposition, and expert report for the *City of Greensboro v The Guilford County Board of Elections* U.S. District Court Case. Deposition and report included several district plans for the city council of Greensboro, NC, and analyzed specific characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.

Provided expert testimony and report for the *Covington v. North Carolina* federal redistricting court case. The testimony included an analysis from *Dickson v Rucho* (also *NAACP v North Carolina*) of compactness on state legislative House and Senate districts.

Provided expert testimony and report for the *Wright v. North Carolina* federal redistricting court case. The testimony and report included an analysis of population deviation, compactness, partisan impact, and incumbent residences for county commission and school board plans.

**Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)**

Developed Senate and House redistricting plans for the state of Alabama for the *ADC v. Alabama* court case. Provided deposition on the creation of the plan. Also, a series of thematic maps was generated, depicting areas added from the previous benchmark plan to the enacted plan and showing concentrations of African American voters added to the enacted plan.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2014)**

Provided expert testimony, report, and deposition for the federal redistricting court case, *Perez v. Perry* of Texas. The report included an analysis of population extrapolations and projections for several submitted plans for select congressional and House districts.

**North Carolina NAACP, Raleigh, NC (2012)**

Provided expert opinions and analysis in an affidavit for the *NC NAACP v. State of North Carolina* federal redistricting case (later *Dickson v Rucho*). The affidavit included an examination of compactness measurements for the Congressional, State Senate, and State House "Benchmark" plans, several approved plans, and several legislative-submitted plans. The report also contained county splits for the target districts.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2011)**

Provided expert opinions and analysis in an affidavit for the *Moore v. State of Tennessee* redistricting case. The affidavit included an analysis of county splits comparing State Senate "Benchmark" plans, the approved plan, and several legislative submitted plans.

**Texas NAACP, San Antonio, TX (2011)**

Provided expert report, deposition, and testimony for the federal redistricting court case *Perez v. Perry*. Testimony covered the evaluation of traditional redistricting criteria of the Congressional and House-approved plans compared to several proposed or legislative submitted plans.

**Louisiana Legislative Black Caucus, Baton Rouge, LA (2011)**

Provided expert testimony in front of the Senate and Governmental Affairs Committee. Testimony included the analysis of two redistricting plans comparing ideal population deviation, political subdivision splits (Parishes), and compactness ratios. Also, developed a redistricting plan and testified in front of the House Governmental Affairs Committee in support of a new majority-minority (African American) congressional district in Louisiana.

**Morrison & Foerster LLP, Los Angeles, CA (2004)**

Provided expert report on several state Senate plans for the *Metts v. Murphy* Rhode Island court case. The report contained analyses of communities of interest areas that were not included in the state's enacted plan for the only majority-minority district.

**Congressional Black Caucus Institute, Redistricting Project, Washington, DC (2002)**

Performed as the redistricting mapping expert for Congressman Hilliard in a consolidated U.S. District redistricting court case in Alabama (*Montiel v. Davis* and *Barnett v. Alabama*). Developed the submitted plan and provided advice to legal counsel for the court case.

**Council of Black Elected Democrats (COBED) New York State, New York, NY (2002)**

Performed as one of the redistricting experts (*Allen v. Pataki/Rodriguez v. Pataki*) by developing several New York State congressional district plans that COBED presented.

**Miami-Dade, Florida (1993)**

Provided expert technical redistricting support as one-half of the Expert Master's Team for the remedial Plan (*Meek v. Metropolitan Dade County*). Developed over 50 commissioner district plans for the county as well as the final adopted Plan for the metro Dade County.

**NAACP Legal Defense and Educational Fund (LDEF), New York, NY (1993)**

Provided expert technical support for the *Shaw v. Reno* Supreme Court case (via Norfolk State University). Analyzed and compared various compactness ratios for congressional districts throughout the U.S. The results were compared to the 12<sup>th</sup> congressional district of North Carolina. Also, developed several alternative congressional district plans.

---

**Major GIS/Demographic/Redistricting Training and Presentations:**

---

**Southern Echo (2021)**

Presented multiple training sessions (11 planned) on various aspects of redistricting. Included both presentations and, ultimately, hands-on (Dave's Redistricting)

**Crowd Academy (2020 – 2021)**

Presented multiple Training sessions (>25) that center on "How the lines are Drawn," which focuses on the plan development activities of redistricting.

**Crescent City Media Group (2021)**

Presented ten three-hour-long training sessions on various aspects of redistricting. Included both presentations and hands-on (Maptitude for Redistricting)

**NAACP LDF/MALDEF Expert Convening (2021)**

Provided multiple sessions to potential future experts on expert report development, giving depositions, and providing testimony.

**SIF Voting Rights Convening (2021)**

Presented on a panel, the unique aspects and issues pertaining to the 2020 round of redistricting.

**SIF Voting Rights Convening (2020)**

Presented on a panel where various preparatory aspects and questions that should be addressed prior to the development of plans.

**Delta Days in the Nation's Capital, Washington, DC (2020)**

Provided a panel presentation on suggested efforts in preparation for the next round of redistricting. Plenary presentation to several hundred Delta Sigma Theta (DST) sorority sisters throughout the country.

**William and Mary, Williamsburg, VA (2019)**

Presented a lecture to the GIS and Districting course students, centering on improving as well as potential adverse trade-offs from improvements of the adopted redistricting plan chosen by the special masters of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case.

**Southern Echo, Jackson, Mississippi (2019)**

Provided detailed training/presentation (3 hours) on various aspects of redistricting. Topics included: Relevant redistricting court cases, traditional redistricting criteria, and redistricting data.

**William and Mary, Williamsburg, VA (2018)**

Presented a lecture to the GIS and Districting course students, centering on aspects of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case. The discussion focused on how to develop a plan to correct the 11 unconstitutional, racially gerrymandered House districts in those states.

**Congressional Black Caucus Institute, Washington, DC (2016)**

Presented at the annual legislative conference in Tunica, MS. Presented the election demographic analysis for the 2016 presidential and Senate elections. The panel also included Congressman Cedrick Richmond (L.A.), Congressman Sanford Bishop (G.A.), and Professor Spencer Overton.

**Coalition of Black Trade Unionists (CBTU), Chicago, IL (2015)**

Presented at the annual CBTU conference on the election panel that included Congressman Al Green (TX) and Congressman Bobby Rush (I.L.).

**Nobel Women's Initiative, Washington, DC (2015)**

Presented on a panel at the annual conference in San Diego, CA, on the upcoming 2020 census.

**Tennessee NAACP, Nashville, TN (2011)**

Provided redistricting training session on the mapping and demographic aspects of Redistricting.

**Congressional Black Caucus Institute, Washington, DC (2002 - 2012, 2014)**

Presented "The Demographics of Campaigns" twelve times at the institute's annual political campaign "Boot Camp." The presentation covers how to locate and utilize demographic data for political campaigns.

**Congressional Black Caucus Foundation (CBCF), Washington, DC (2011)**

Presented as one of the panelists at the "Judge A. Leon Higginbotham" Braintrust at the CBC Annual Legislative Conference. The panel was moderated by Congressman Mel Watt.

**The Advancement Project, Washington, DC (2011)**

Trained staff GIS person on Maptitude for Redistricting as well as on redistricting scenarios.

**National Association for the Advancement of Colored People, Baltimore, MD (2011)**

Provided training session on "Redistricting Mapping Overview" at the organization's national redistricting training seminar for state and local chapters.

## **Major GIS/Demographic/Redistricting Training and Presentations (cont.):**

---

### **Congressional Black Caucus Institute, Washington, DC (2010)**

Presented at the annual CBC Institute conference in Tunica, MS (The panel included Congressman John Lewis and Congressman Jim Clyburn). Outlined two critical issues that would surface in the 2010 round of redistricting: 1) Prison-based Gerrymander, and 2) The use of Citizen Voting Age Population (CVAP).

### **Community Census and Redistricting Institute (CCRI), Durham, NC (2010)**

Developed, managed, and provided hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers on all aspects of plan development.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2010)**

Provided a presentation on "Redistricting Laws & GIS" at the *Unfinished Work* conference. The presentation outlined the evolution of major redistricting laws and GIS and their impact on minority representation.

### **NAACP Legal Defense Fund AIRLIE Conference, AIRLIE, VA (2010)**

Provided training using hands-on "paper" redistricting scenarios to voting rights advocates on developing a plan without the use of computers.

### **Young Elected Officials, Los Angeles, CA (2010)**

Provided training using hands-on "paper" redistricting scenarios to young legislators on developing a plan without the use of computers.

### **Young Elected Officials, Alexandria, VA (2010)**

Provided overview training on the significant aspects of redistricting to young legislators.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2006)**

Provided a presentation on "Congressional Elections Won by African Americans Race & Ethnicity District Perspective (1960 - 2004)" at the *Who Draws the Lines? The Consequences of Redistricting Reform for Minority Voters* conference.

### **Howard University - Continuing Education - HBCU GIS Workshop, Washington, DC (2002)**

Provided a presentation on redistricting and the use of Maptitude for Redistricting to faculty members of Historically Black Colleges and Universities (HBCUs).

### **Norfolk State University Redistricting Project Training Workshops (1991 - 1998)**

Provided redistricting training to the following:

- Alabama State University, Montgomery, Alabama
- Albany State University, Albany, Georgia
- Florida A & M, Tallahassee, Florida
- National Conference of Black Political Scientists, Atlanta, Georgia Conference
- Norfolk State University, Norfolk, Virginia
- North Carolina A & T State University, Greensboro, North Carolina
- North Carolina Central University, Durham, North Carolina
- Southern University, Baton Rouge, Louisiana
- Williams College, Williamstown, Massachusetts

## Major GIS/Redistricting/Voter Data Software Experience:

---

- ArcGIS - GIS Software - Primary GIS Software after 2012 ([ESRI](#))
- ArcGIS Online – Including Story Maps & Web Application Builder ([ArcGIS.com](#))
- GRASS GIS – Open-Source GIS ([OSGeo](#))
- Maptitude for Redistricting - Primary Redistricting software, since 2001 ([Caliper](#))
- ESRI Redistricting Online - Beta Tester ([ESRI](#))
- Public Mapping Project – Initial Advisory Board Member ([an open-source online software](#))
- ReapS Redistricting and Reapportionment System - Redistricting software, 1990s ([LogiSYS](#))
- Voter Activation Network System [NPGVAN](#)
- Voterlistonline.com Aristotle software [Aristotle](#)

## GIS Skillset/Coding Languages:

---

- |                       |                        |              |
|-----------------------|------------------------|--------------|
| • Geocoding Data      | • Suitability Analysis | • Python     |
| • Linear Referencing  | • Image Classification | • PostgreSQL |
| • Digital Cardinality | • ArcGIS Web Services  |              |
| • Spatial Statistics  | • pdAdmin              |              |

## ESRI Training Certificates:

---

- Learning ArcGIS Desktop (for ArcGIS 10) - 24 hrs. training
- Turning Data into Information Using ArcGIS 10 - 18 hrs. training
- Basics of Raster Data (for ArcGIS 10) - 3 hrs.. training
- Using Raster Data for Site Selection (for ArcGIS 10) - 3 hrs. training
- Working with Geodatabase Domains and Subtypes in ArcGIS - 3 hrs. training
- Network Analysis Using ArcGIS - 3 hrs. training.

## Publications:

---

### Books

- *An Introduction to the Presidential Trend*, Statistical Press, March 2015
- *The Presidential Trend*, Statistical Press, December 2013
- *A Step-by-Step Guide to Using Census 2000 Data*, MediaChannel LLC, March 2004. Also included was a companion CD-ROM (sold through various Census-related workshops and training sessions and used in a political science course).

### Manuals

- *A Beginner's Guide to Using Census 2000 Data*, November 2002 (Co-authored- developed for the U.S. Census Bureau's Census Information Centers)

### Articles

- "Precision Voter Targeting: GIS Maps Out a Strategy," Geo Info Systems, November 1996 (Co-authored one of the first articles published on using modern-day GIS for voter targeting).

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

---

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**Supplemental Expert Report of Dr. Kassra A.R. Oskooii**

October 31, 2025

## I. Executive Summary

1. I am a tenured Associate Professor in the department of Political Science and International Relations at the University of Delaware. I submitted an expert report in this case on August 1, 2024 which sets forth my qualifications and compensation. I also submitted a reply report in this case on October 17, 2024, a supplemental report on November 3, 2024, a second supplemental report on March 17, 2025, and a supplemental rebuttal report on March 31, 2025. I testified at trial in Winston-Salem in June of 2025, and I understand my reports and their accompanying exhibits were admitted into evidence as Plaintiffs' Exhibits NAACPPX189-94, 202-03, 208-11, and 215. My compensation is not in any way contingent on the content of my opinions or the outcome of this matter. My updated curriculum vitae is included in **Appendix B**.
2. I was asked to provide this Supplemental Report to analyze the changes to the 2023 Congressional Plan adopted by the North Carolina General Assembly on October 22, 2025, in Senate Bill 249, and specifically to provide a performance analysis on Congressional Legislative Districts (CLDs) 1 and 3 under their 2023 and 2025 configurations.<sup>1</sup>
3. For this report, I was asked to apply the same methods of performance analysis used in my previous reports and the same electoral data, *see* NAACPPX189 at 14-16. I applied these electoral data sets to analyze the 2025 Congressional Districts, utilizing the block assignment file for Senate Bill 249 from the North Carolina General Assembly's website.<sup>2</sup>
4. The results of my performance analysis by election and district are appended to this Report in **Appendix A** (Tables A1-A6). Below I have included summary tables showing the performance over all 64 statewide exogenous general elections<sup>3</sup> from 2016 through 2024 for Congressional Districts 1 and 3 under the 2023 and 2025 districts:

---

<sup>1</sup> A performance analysis reconstructs previous election results based on various district boundaries (e.g., 2023 Enacted vs. 2025 Enacted Districts), to determine which contests the preferred candidates of minority voters (e.g., Black voters) win or lose.

<sup>2</sup> I sourced the block assignment file for Senate Bill 249 from <https://www.ncleg.gov/Committees/CommitteeInfo/SenateStanding/154/Documents/19984>. I understand from counsel that this draft, "CCM-2," was adopted without amendment in the redistricting process.

<sup>3</sup> I do not consider any endogenous contests for comparing electoral performance across plans and districts because the congressional district boundaries were redrawn. As a result, voters within the 2025 amended congressional districts did not all vote for the same congressional candidates in the 2024 general election.

Table 1: Summary of 2023 Enacted CLDs 1 & 3 Electoral Performance Results

| Plan         | Racial Composition of Districts         |         | Success of Black-Preferred Candidates by Election Year |                       |                        |                       |                        |
|--------------|-----------------------------------------|---------|--------------------------------------------------------|-----------------------|------------------------|-----------------------|------------------------|
| 2023 Enacted | 2020 Census Voting Age Population (VAP) |         | 2024<br>(15 Elections)                                 | 2022<br>(7 Elections) | 2020<br>(20 Elections) | 2018<br>(4 Elections) | 2016<br>(18 Elections) |
| CLD          | % NH White                              | % Black | Win Rate                                               | Win Rate              | Win Rate               | Win Rate              | Win Rate               |
| 1            | 50.70%                                  | 40.42%  | 40%                                                    | 0%                    | 90%                    | 100%                  | 100%                   |
| 3            | 65.28%                                  | 21.35%  | 0%                                                     | 0%                    | 0%                     | 0%                    | 6%                     |

Table 2: Summary of 2025 Enacted CLDs 1 & 3 Electoral Performance Results

| Plan         | Racial Composition of Districts         |         | Success of Black-Preferred Candidates by Election Year |                       |                        |                       |                        |
|--------------|-----------------------------------------|---------|--------------------------------------------------------|-----------------------|------------------------|-----------------------|------------------------|
| 2025 Enacted | 2020 Census Voting Age Population (VAP) |         | 2024<br>(15 Elections)                                 | 2022<br>(7 Elections) | 2020<br>(20 Elections) | 2018<br>(4 Elections) | 2016<br>(18 Elections) |
| CLD          | % NH White                              | % Black | Win Rate                                               | Win Rate              | Win Rate               | Win Rate              | Win Rate               |
| 1            | 59.73%                                  | 32.34%  | 7%                                                     | 0%                    | 5%                     | 50%                   | 33%                    |
| 3            | 56.17%                                  | 29.40%  | 7%                                                     | 0%                    | 0%                     | 50%                   | 17%                    |

5. As I found in my March 2025 Supplemental Report, NAACPPX208 ¶ 70:

*In CLD 1, the VAP is 50.70% White and 40.42% Black. The performance results show that Black-preferred candidates won 6 out of 15 exogenous contests (40%) in the 2024 election. This represents a decline compared to the 2020 and 2016 presidential election cycles, in which the Black-preferred candidates won 90% and 100% of the contests, respectively. It also represents a significantly lower win rate than that of Black-preferred candidates in Interim CLD 1, suggesting that Black voters will have comparatively less success in overcoming White bloc voting in 2023 Enacted CLD 1 than in 2022 Interim CLD 1. However, in the 2024 congressional race, Black-preferred candidate Don Davis narrowly defeated White-preferred candidate Laurie Buckhout (49.52% vs. 47.87%).*

6. Based on performance results from a comprehensive series of election contests spanning 2016 through 2024, I conclude that it is highly unlikely for either of the 2025 Enacted districts—CLD 1 or CLD 3—to perform for Black-preferred candidates.<sup>4</sup>

---

<sup>4</sup> Black-preferred candidates were originally identified in my prior reports through comprehensive racially polarized voting (RPV) analyses conducted across multiple jurisdictions in the state. As a secondary verification, I replicated these RPV analyses using the same methodological approach applied in my earlier work, *see* NAACPPX189 at 12-14, focusing on the most recent presidential (2024) and midterm (2022)

Between 2020 and 2024, Black-preferred candidates in both districts almost never prevailed, with win rates ranging from 0% to no higher than 7%. In 2018, Black-preferred candidates prevailed in 2 of 4 contests within the 2025 CLD 1 and 3 boundaries. However, both victories occurred in three-candidate races in which two White-preferred candidates split the vote, resulting in wins by plurality rather than majority. Looking further back to 2016, Black-preferred candidates lost most contests in both districts, with win rates of 33% in CLD 1 and 17% in CLD 3.

7. Comparing results for CLD 1 under the 2023 and 2025 district configurations reveals a clear decline in the electoral performance of Black-preferred candidates. Under 2023 CLD 1, Black-preferred candidates achieved a 40% win rate in the 2024 general election, whereas under 2025 CLD 1, that rate dropped sharply to just 7%. Both districts show a 0% win rate in the 2022 general election. In earlier election years, Black-preferred candidates performed substantially better under 2023 CLD 1, with win rates of 90% in 2020, 100% in 2018, and 100% in 2016, compared to markedly lower levels of success under the 2025 Enacted configuration—5% in 2020, 50% in 2018, and 33% in 2016.
8. Comparing results for CLD 3 under the 2023 and 2025 district configurations reveals that both district configurations are highly unlikely to perform for Black-preferred candidates.
9. The findings and conclusions in this Report are based upon information that has been made available to me or known by me to date. My work in this matter is ongoing and I reserve the right to modify, update, or supplement my analyses, findings, and any conclusions as additional information is made available to me or as I perform further analysis.

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.



---

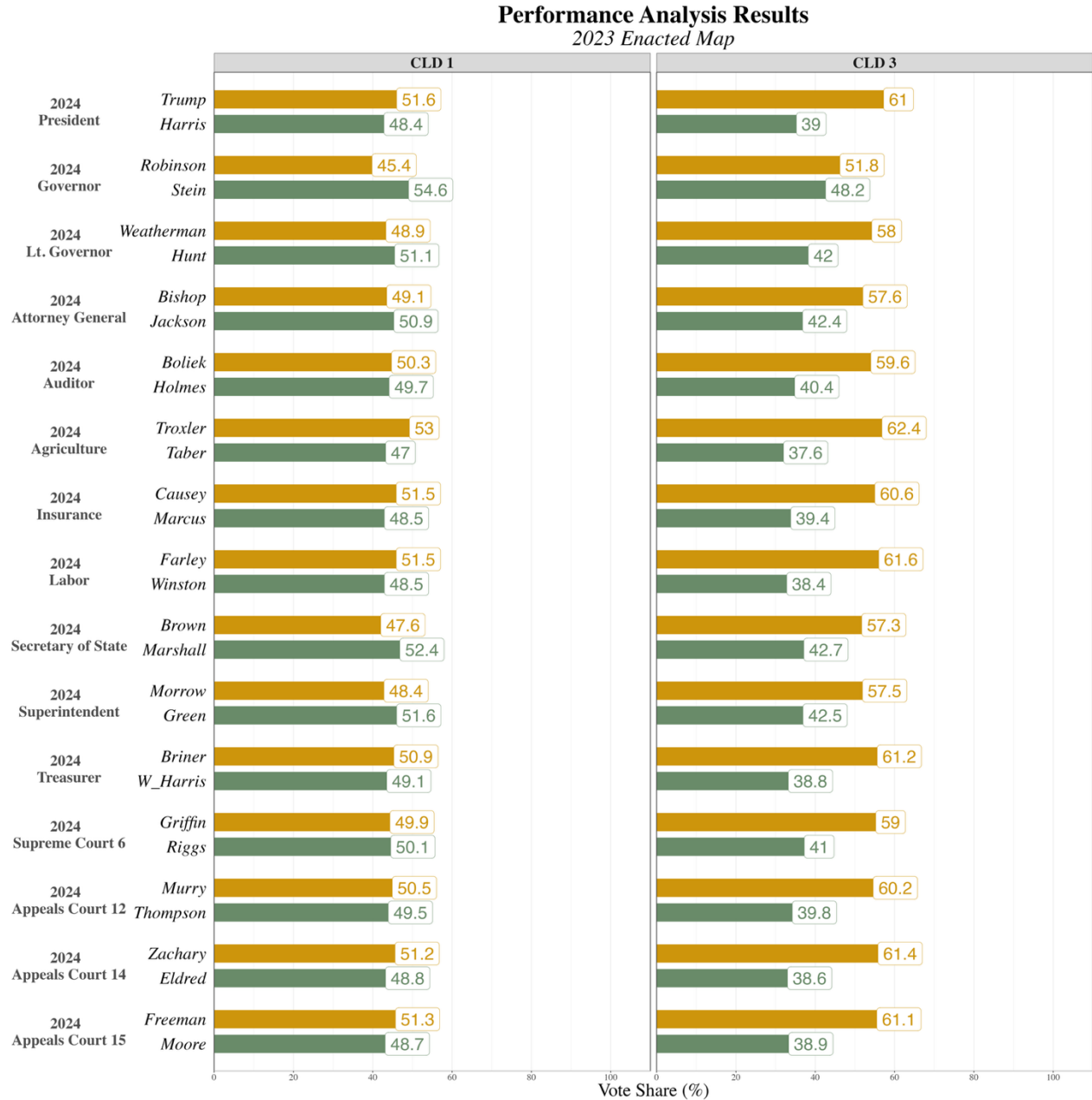
Kassra A.R. Oskooii  
10/31/2025

---

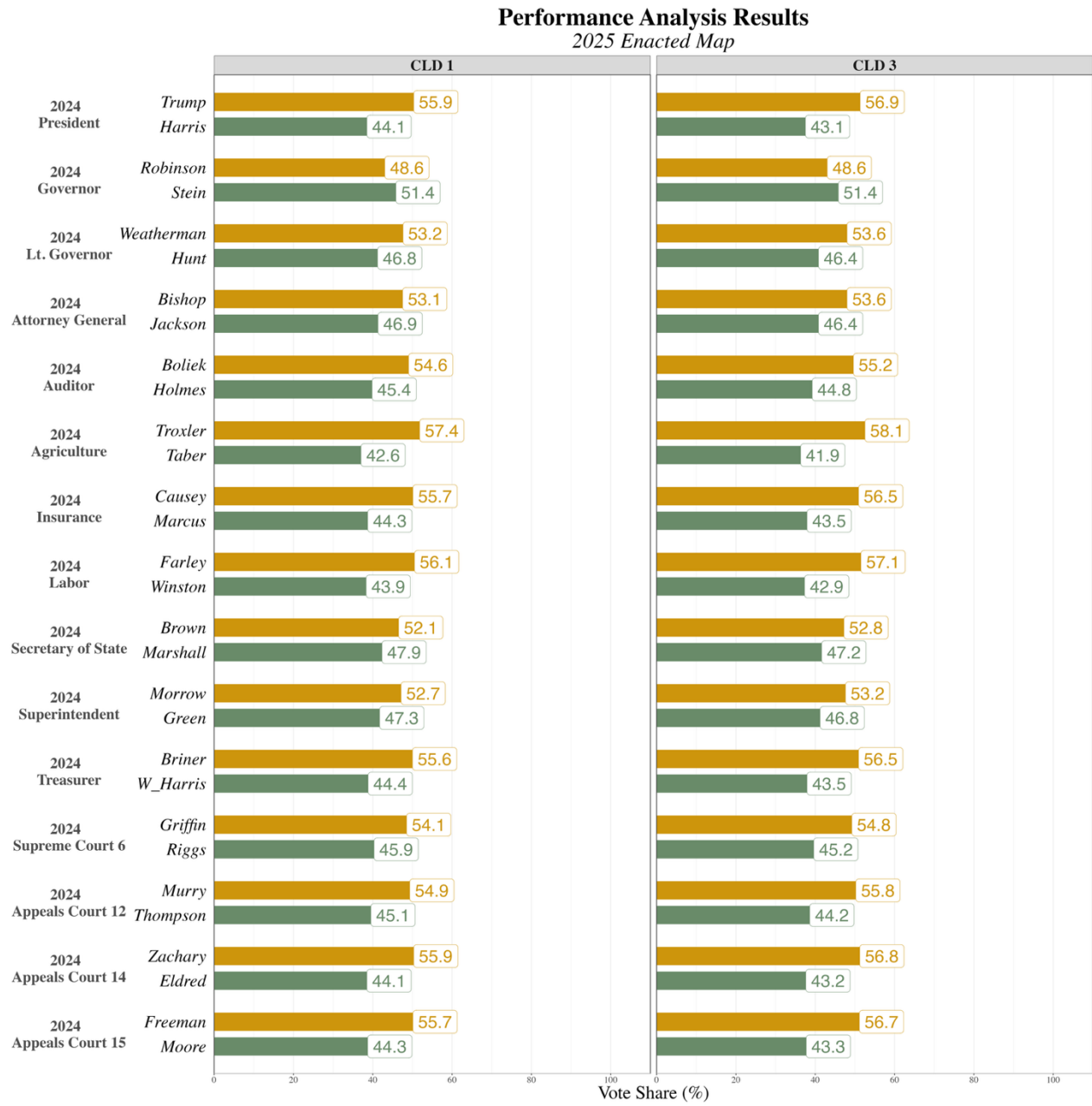
election cycles and applying the 2025 Enacted CLD 1 and CLD 3 boundaries. As reported in **Appendix A** (Tables A7–A14), the results confirm that candidate preferences among Black and White voters remained consistent within the new 2025 districts. In short, this supplemental analysis found no divergence in candidate preferences between Black and White voters for 2025 CLDs 1 and 3.

## Appendix A

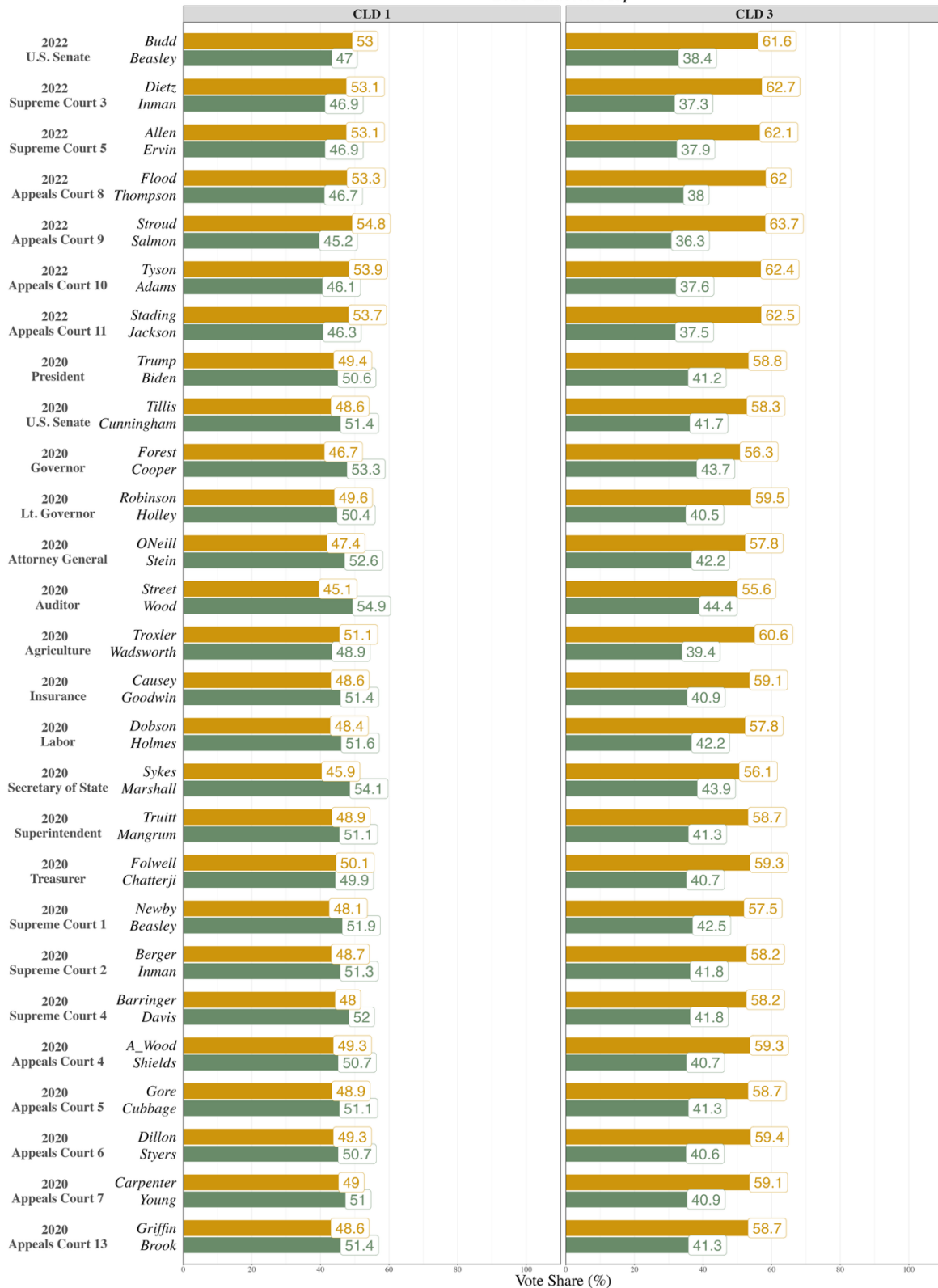
**Figure A1: Electoral Performance Results for 2023 Enacted CLDs 1 & 3,  
2024 General Election Contests**



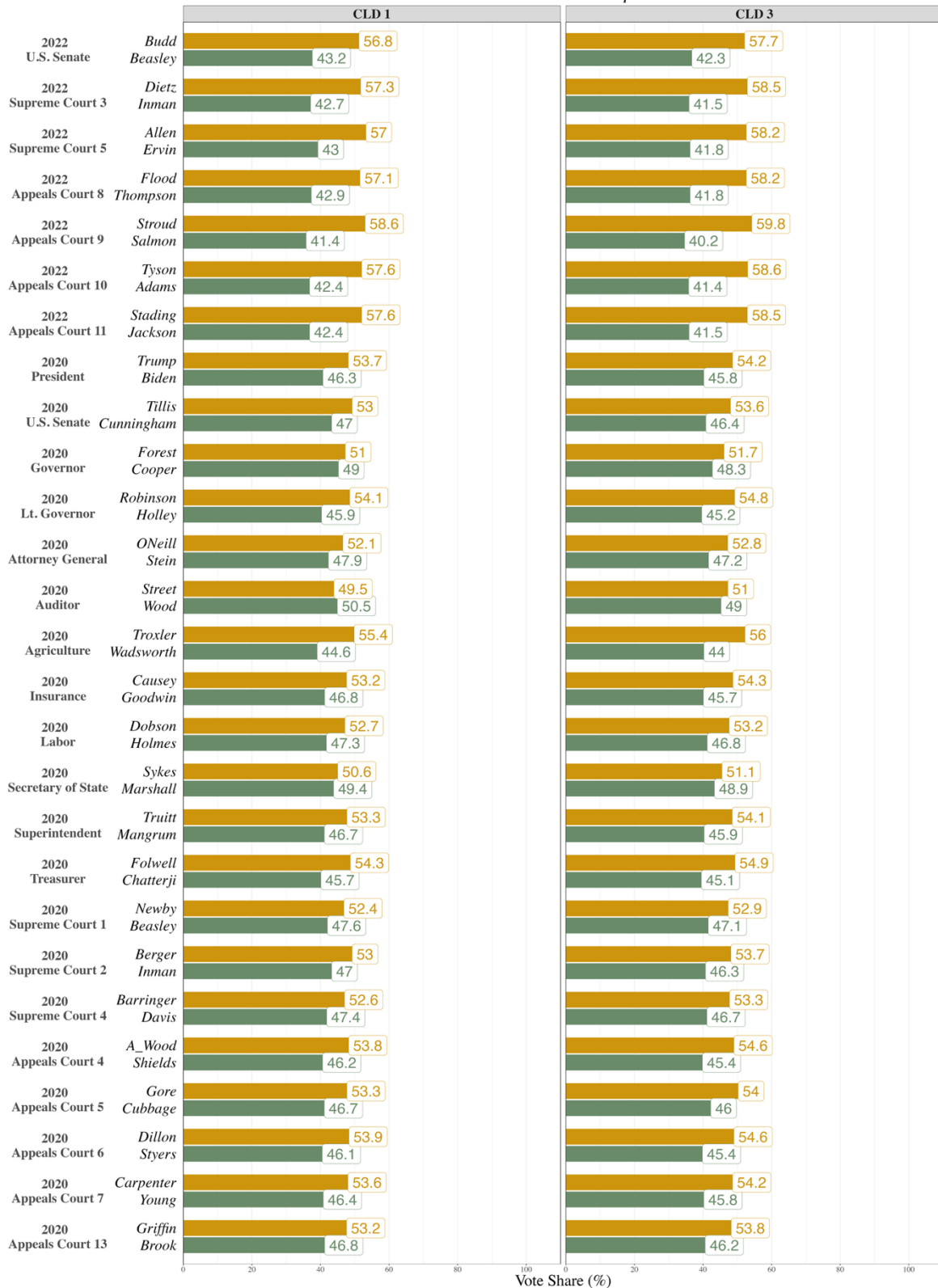
**Figure A2: Electoral Performance Results for 2025 Enacted CLDs 1 & 3,  
2024 General Election Contests**



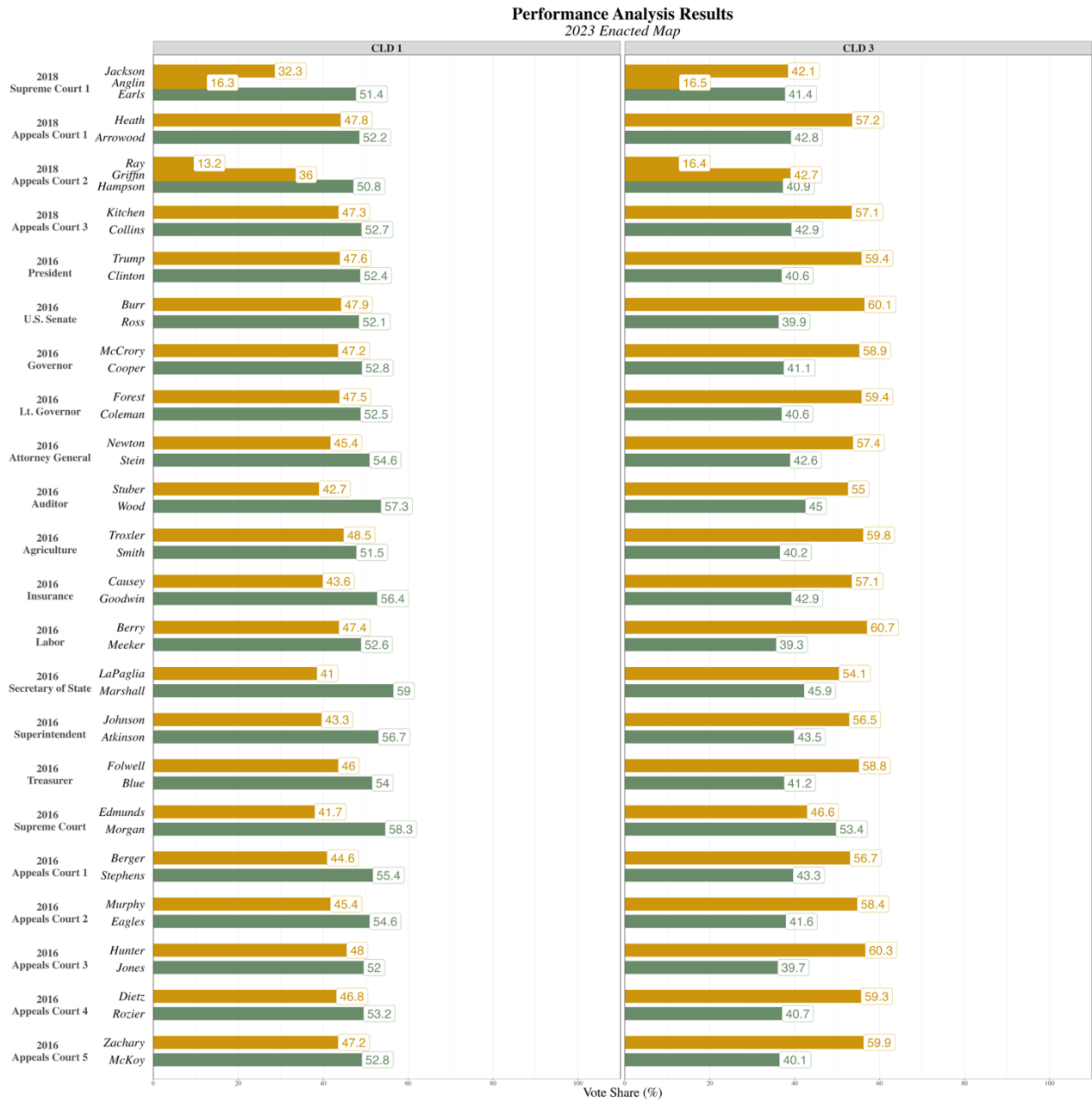
**Figure A3: Electoral Performance Results for 2023 Enacted CLDs 1 & 3,  
2022 & 2022 General Election Contests**  
**Performance Analysis Results**  
*2023 Enacted Map*



**Figure A4: Electoral Performance Results for 2025 Enacted CLDs 1 & 3,  
2022 & 2022 General Election Contests**  
**Performance Analysis Results**  
*2025 Enacted Map*



**Figure A5: Electoral Performance Results for 2023 Enacted CLDs 1 & 3,  
2018 & 2016 General Election Contests**



**Figure A6: Electoral Performance Results for 2025 Enacted CLDs 1 & 3,  
2018 & 2016 General Election Contests**

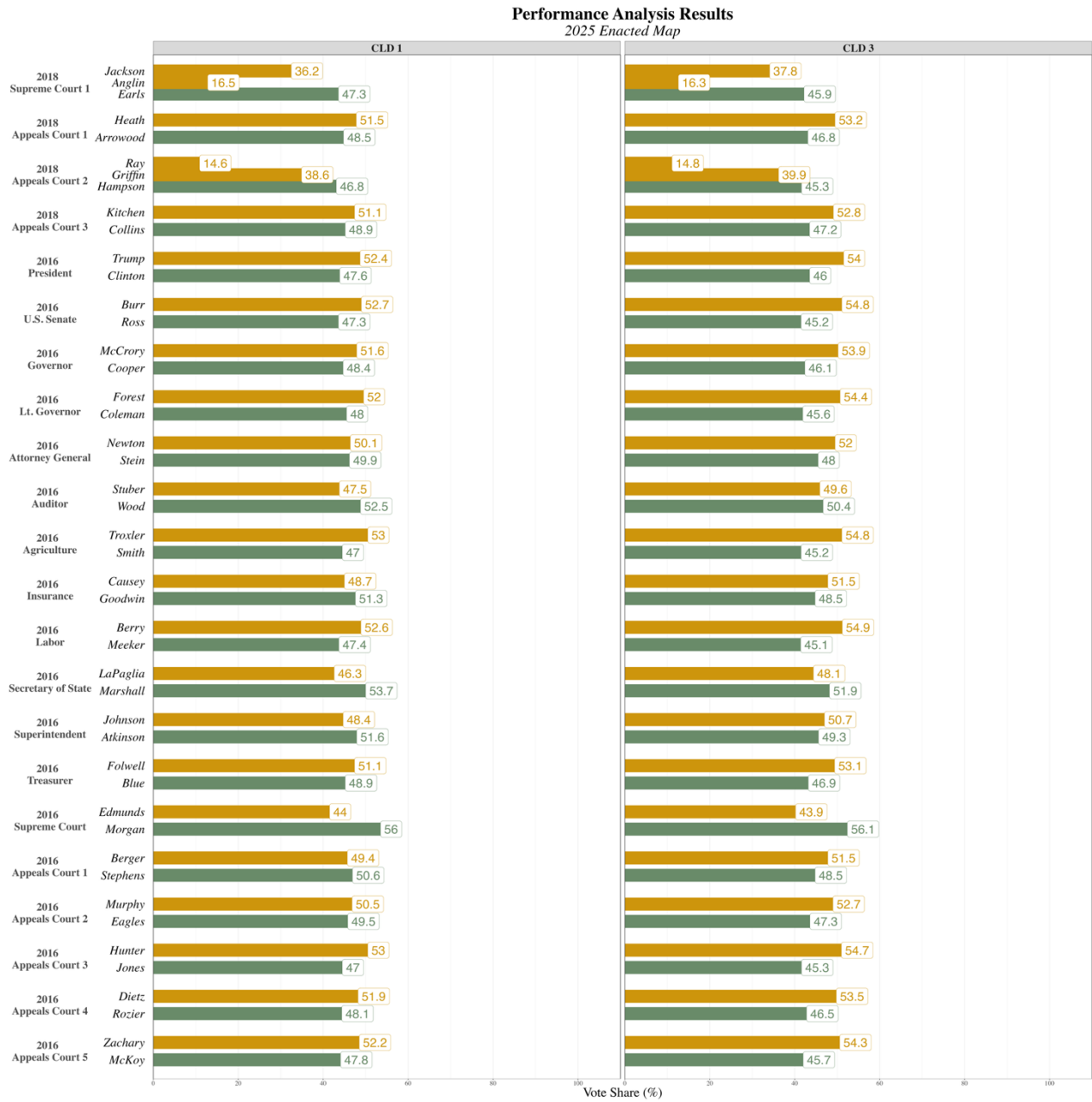


Figure A7: EI Iterative 2024 General Election RPV Results for 2025 Enacted CLD 1

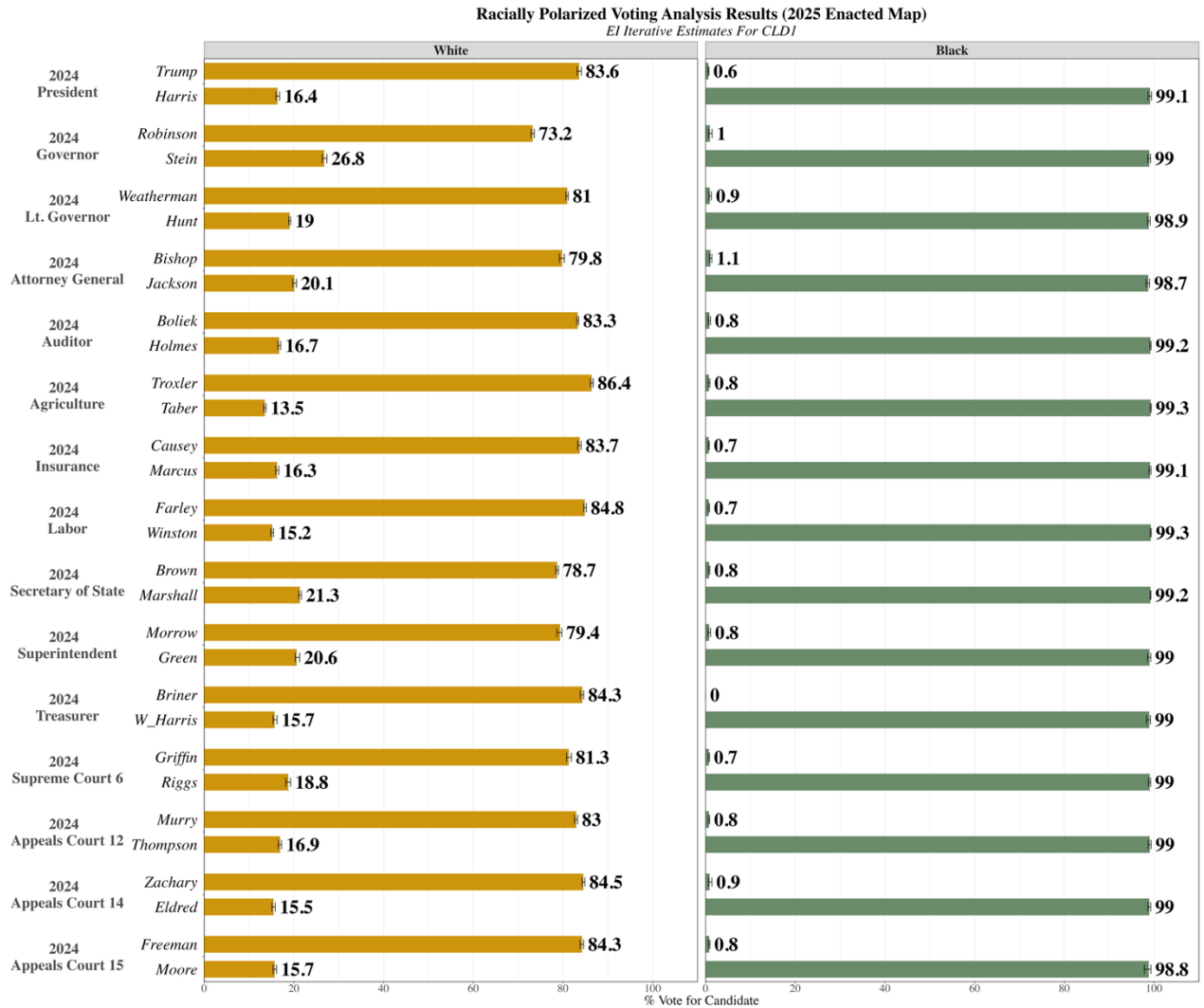


Figure A8: EI RxC 2024 General Election RPV Results for 2025 Enacted CLD 1

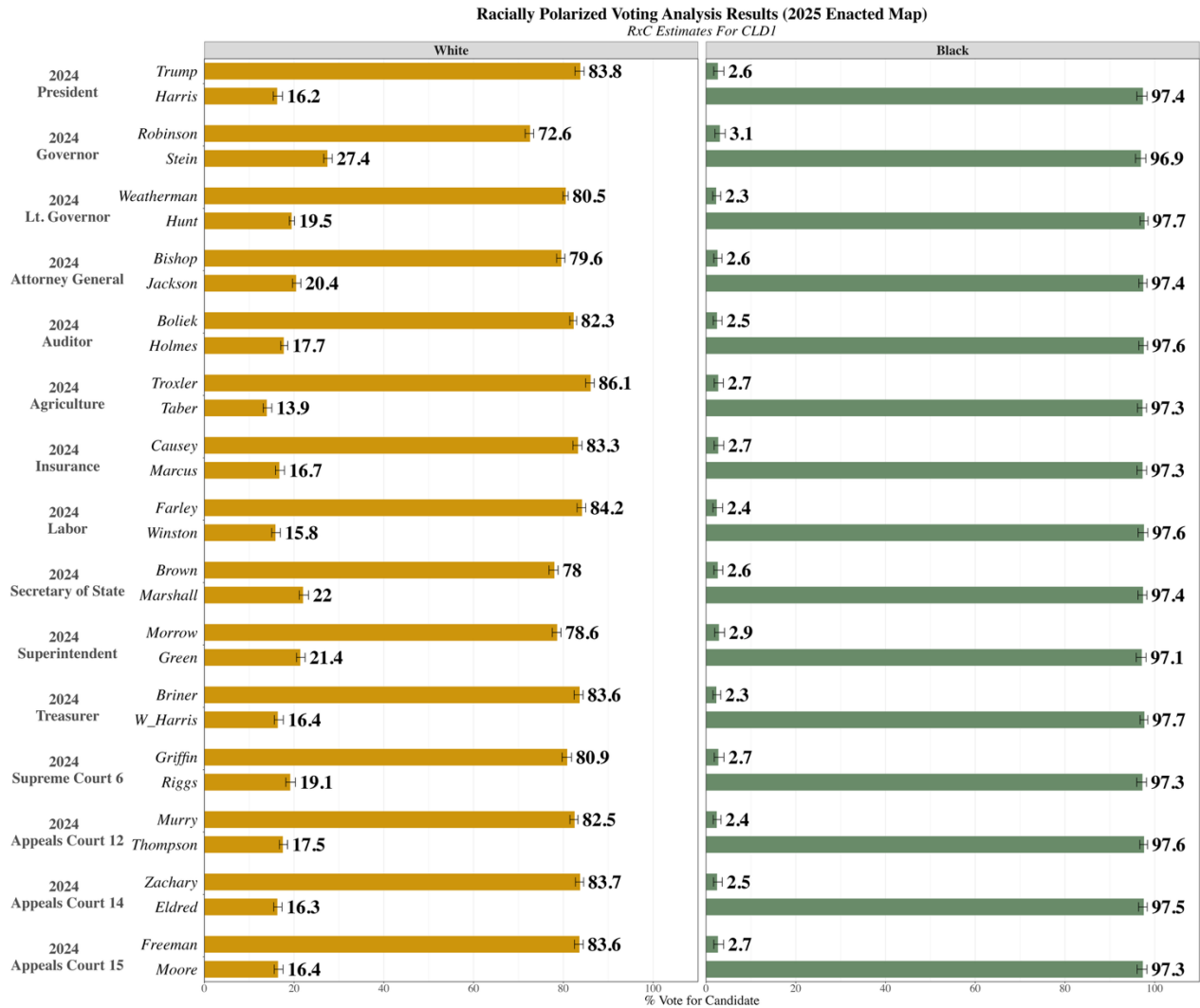


Figure A9: EI Iterative 2024 General Election RPV Results for 2025 Enacted CLD 3

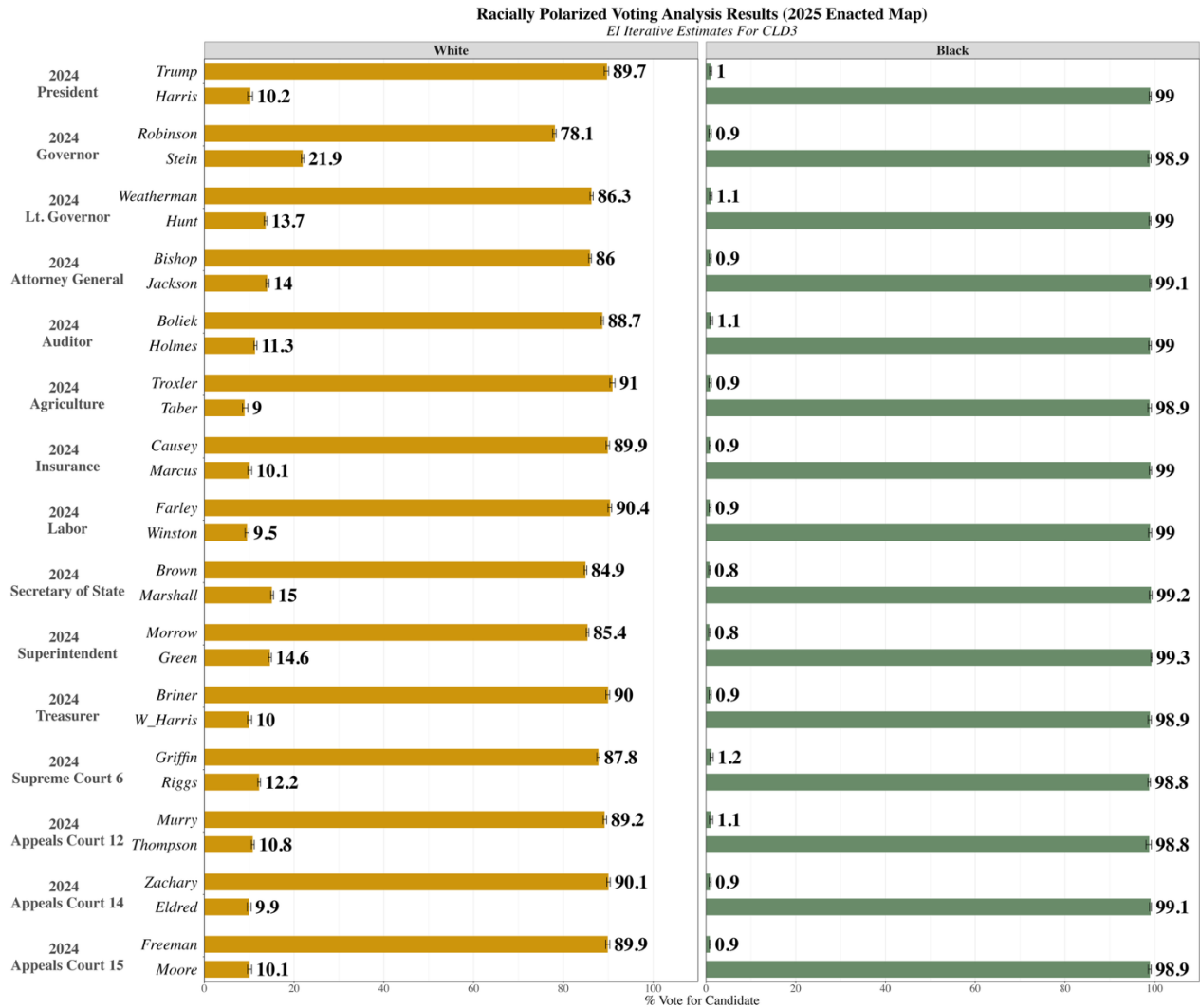


Figure A10: EI RxC 2024 General Election RPV Results for 2025 Enacted CLD 3

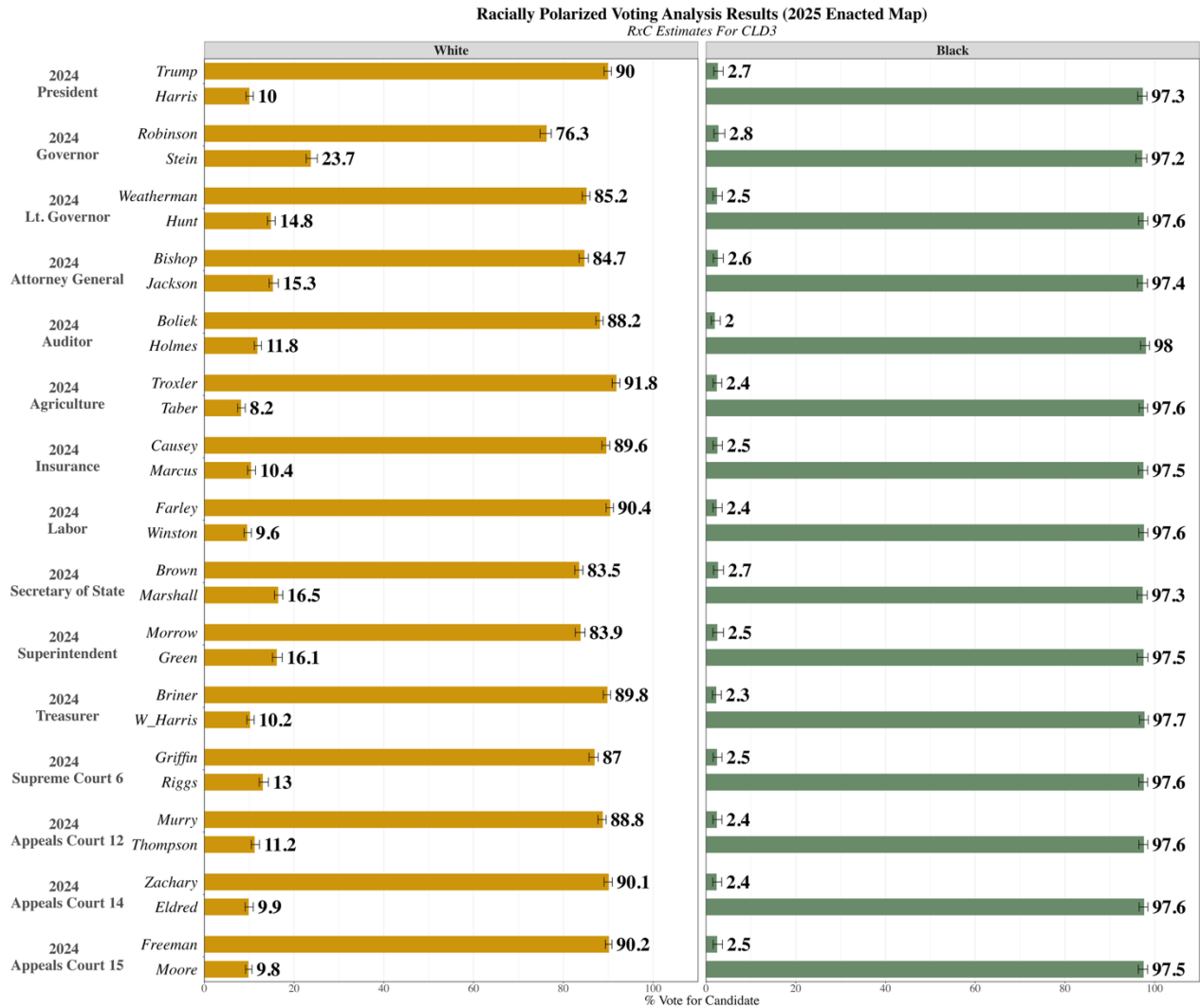


Figure A11: EI Iterative 2022 General Election RPV Results for 2025 Enacted CLD 1

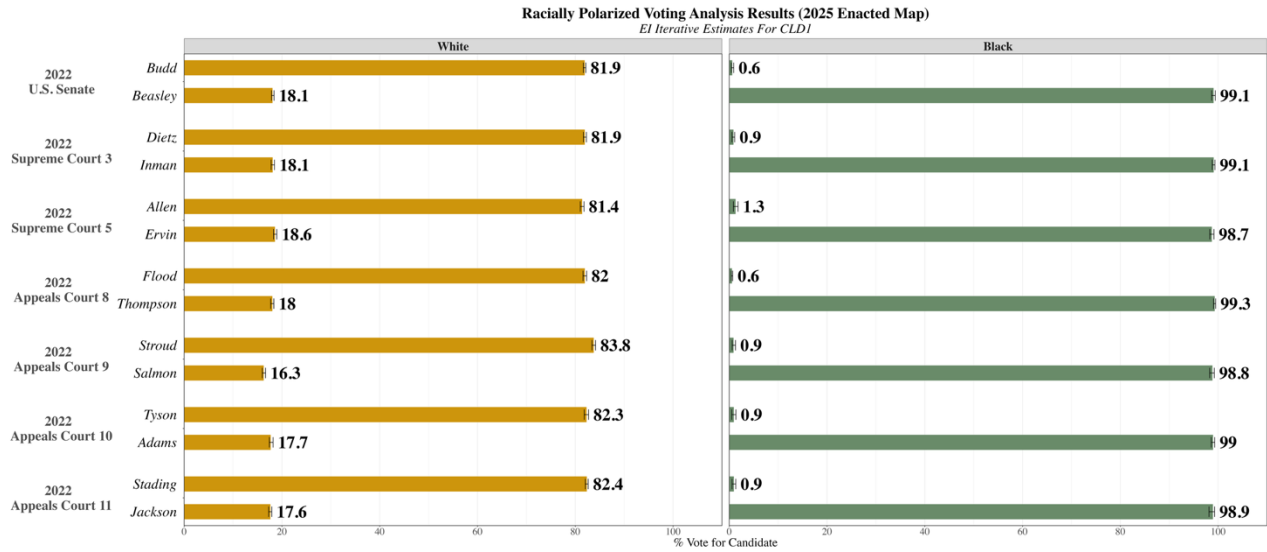


Figure A12: EI RxC 2022 General Election RPV Results for 2025 Enacted CLD 1

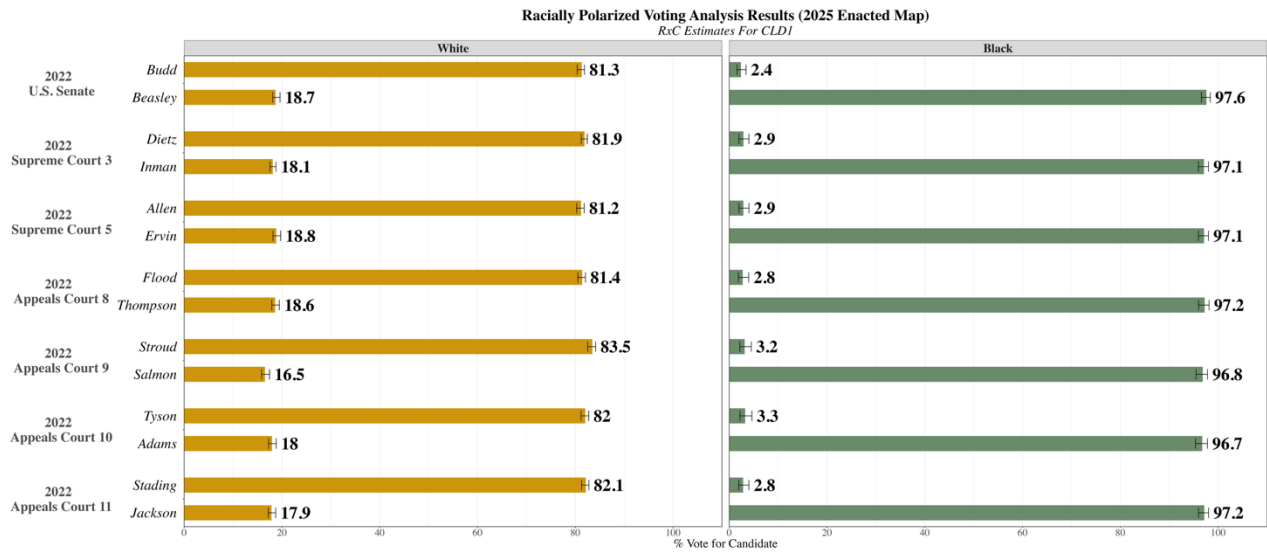


Figure A13: EI Iterative 2022 General Election RPV Results for 2025 Enacted CLD 3

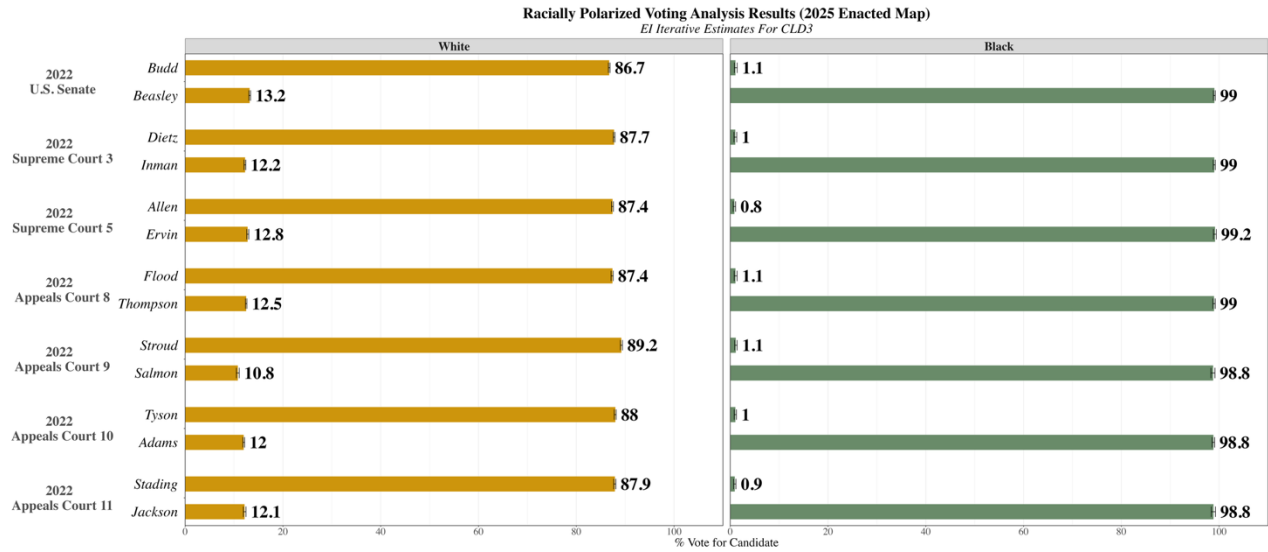
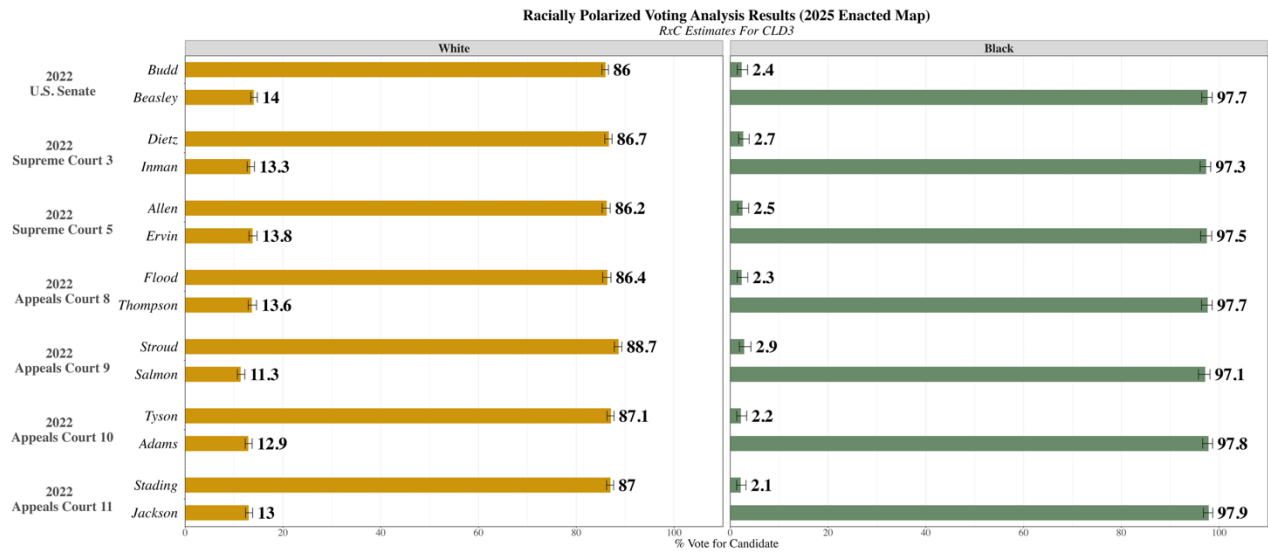


Figure A14: EI RxC 2022 General Election RPV Results for 2025 Enacted CLD 3



# APPENDIX B to Oskooii Supplemental Report

## Kassra A.R. Oskooii

---

### Contact Information

University of Delaware  
Political Science & International Relations  
403 Smith Hall, 18 Amstel Ave  
Newark, DE 19716

☎ (302) 831-2355  
📠 (302) 831-4452  
✉ oskooiik@udel.edu  
💻 [www.kassraoskooii.com](http://www.kassraoskooii.com)

### Academic Appointments

#### University of Delaware

Political Science & International Relations

Associate Professor

2021-Present

Assistant Professor

2016-2021

#### *Current Faculty Affiliations:*

Data Science Institute (DSI)

2023-Present

Master of Science in Data Science (MSDS)

2023-Present

Center for Political Communication (CPC)

2016-Present

Center for the Study of Diversity (CSD)

2016-Present

### Education

#### University of Washington

Ph.D., 2016

Department of Political Science

General Fields: American Politics & Political Methodology

Specialized Field: Minority and Race Politics

#### University of Washington

M.A., 2013

Department of Political Science

Center for Statistics & the Social Sciences (CSSS)

Political Methodology Field Certificate (2013)

#### University of Washington

B.A., 2008

Major: Political Science

Minors: Human Rights and Law, Societies, & Justice

### Peer-Reviewed Journal Publications

“Bureaucratic Bias or Voter-Side Factors? Testing Competing Explanations for Racial Gaps in Vote-By-Mail Ballot Signature Rejections.” *Forthcoming. Political Research Quarterly.* w/ Herndon and Rios.

“[Neighboring Groups and Political Attacks.](#)” *Forthcoming. Political Research Quarterly.* w/ Besco, Garcia-Rios, Lagodny, Lajevardi, and Tolley.

“[Anti-Muslim Policy Preferences and Boundaries of American Identity Across Partisanship.](#)” 2024. *Journal of Public Policy*, 44(3): 573-591. w/ Lajevardi, N.

- "In the Shadow of September 11: The Roots and Ramifications of Anti-Muslim Attitudes in the United States." 2024. **Advances in Political Psychology**, 45(S1): 87-118. w/ Lajevardi, N., Saleem, M., and Docherty, M.
- "Social Mobility Through Immigrant Resentment: Explaining Latinx Support for Restrictive Immigration Policies and Anti-Immigrant Candidates." 2024. **Public Opinion Quarterly**, 88(1): 51-78. w/ Hickel, F., and Collingwood, L.
- "The Participatory Implications of Racialized Policy Feedback." 2023. **Perspectives on Politics**, 21(3): 932-950. w/ Garcia-Rios, S., Lajevardi, N. and Walker, H.
- "Undermining Sanctuary? When Local and National Partisan Cues Diverge." 2023. **Urban Affairs Review**, 59(1): 133-169. w/ Collingwood, L. & Martinez, G.
- "Fight Not Flight: The Effects of Explicit Racism on Minority Political Engagement." 2022. **Electoral Studies**, 80: 102515. w/ Besco, R., Garcia-Rios, S., Lagodny, J., Lajevardi, N., Tolley, E.
- "Hate, Amplified? Social Media News Consumption and Anti-Muslim Policy Support." 2022. **Journal of Public Policy**, 42: 656-683. w/ Lajevardi, N. and Walker, H. (FirstView)
- "Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI and EI-RxC Methods." 2022. **Sociological Methods and Research**, 51(1): 271-304. w/ Barreto, M., Collingwood & Garcia-Rios, S.
- "Beyond Generalized Ethnocentrism: Islam-Specific Beliefs and Prejudice toward Muslim Americans." 2021. **Politics, Groups, and Identities**, 9(3): 538-565. w/ Dana, K. & Barreto, M.
- "Opinion Shift and Stability: The Information Environment and Long-Lasting Opposition to Trump's Muslim Ban." 2021. **Political Behavior**, 43: 301-337. w/Lajevardi, N. & Collingwood, L.  
Covered in: *The Washington Post* (Monkey Cage)
- "The Role of Identity Prioritization: Why Some Latinx Support Restrictionist Immigration Policies and Candidates." 2020. **Public Opinion Quarterly**, 84: 860-891. w/ Hickel, F., Alamillo, R. & Collingwood, L.
- "Perceived Discrimination and Political Behavior." 2020. **British Journal of Political Science**, 50(3): 867-892.

- “The Paradox Between Integration and Perceived Discrimination Among American Muslims.” 2020. *Political Psychology*, 41(3): 587-606. w/ Lajevardi, N., Walker, H. & Westfall, A.  
Winner of the 2019 American Political Science Association Race, Ethnicity, and Politics Section Best Paper Award.
- “Veiled Politics: Experiences with Discrimination among Muslim Americans.” 2019. *Politics and Religion*, 12(2): 629-677. w/ Dana, K., Lajevardi, N., & Walker, H.
- “Partisan Attitudes toward Sanctuary Cities: The Asymmetrical Effects of Political Knowledge.” 2018. *Politics and Policy*, 46 (6): 951-984. w/ Dreier, S. & Collingwood, L.
- “A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump’s Muslim Ban.” 2018. *Political Behavior*, 40: 1035-1072. w/ Collingwood, L. & Lajevardi, N.  
Covered in: *The Washington Post* (Monkey Cage), Vox, ThinkProgress, NPR, Al Jazeera, Middle East Eye, Psychology Today, & Social Psych Online
- “Old-Fashioned Racism, Contemporary Islamophobia, and the Political Isolation of Muslim Americans in the Age of Trump.” 2018. *Journal of Race, Ethnicity, and Politics*, 3(1): 112-152. w/ Lajevardi, N.
- “The Politics of Choice Reconsidered: Partisanship, Ideology, and Minority Politics in Washington’s Charter School Initiative.” 2018. *State Politics and Policy Quarterly*, 18(1): 61-92. w/ Collingwood, L. & Jochim, A.
- “Muslims in Great Britain: The Impact of Mosque Attendance on Political Behaviour and Civic Engagement.” 2018. *Journal of Ethnic and Migration Studies*, 44(9): 1479-1505. w/ Dana, K.
- “eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC.” 2016. *R Journal*, 8(2): 92-101. w/ Collingwood, L., Barreto, M. & Garcia-Rios, S.
- “How Discrimination Impacts Sociopolitical Behavior: A Multidimensional Perspective.” 2016. *Political Psychology*, 37(5): 613-640.
- “Mosques as American Institutions: Mosque Attendance, Religiosity and Integration into the Political System among American Muslims.” 2011. *Religions*, 2(4): 504-524. w/ Dana, K. & Barreto, M.

|                                           |                                                                                                                                                                                                                                            |             |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Book Chapters/<br>Encyclopedic<br>Entries | "Discrimination." Forthcoming. In <b>Springer Political Science Encyclopedia</b> edited by Audrey Gagnon, Stephen Sawyer, and Daniel Stockemer.                                                                                            |             |
|                                           | "Discrimination." 2023. In <b>Edward Elgar Encyclopedia of Political Sociology</b> edited by Maria Grasso and Marco Giugni. 33:131-133.                                                                                                    |             |
|                                           | "Race and Racism in U.S. Campaigns." 2020. In <b>Oxford Handbook on Electoral Persuasion</b> edited by Liz Suhay, Bernie Grofman, and Alex Trechsel. 15:278–295. w/ Christopher Parker, Christopher Towler, and Loren Collingwood.         |             |
| Book Reviews                              | "Understanding Muslim Political Life in America: Contested Citizenship in the Twenty-First Century." Edited by Brian R. Calfano and Nazita Lajevardi. Philadelphia: Temple University Press, 2019. 248p. <b>Perspectives on Politics</b> . |             |
| Public Writing                            | "Biden reverses Trump's 'Muslim Ban.' Americans support the decision." <b>The Washington Post (Monkey Cage)</b> (27 January, 2021). w/ Lajevardi, N. and Collingwood, L.                                                                   |             |
|                                           | "Targeted: Veiled Women Experience Significantly More Discrimination in the U.S." <b>Religion in Public</b> (21 January, 2020). w/ Dana, K., Lajevardi, N., and Walker, H.                                                                 |             |
|                                           | "Here's what the Democrats need to do to get the DREAM Act through Congress." <b>LSE American Politics and Policy Blog</b> (29 January, 2018). Also covered by Newsweek U.S. Edition. w/ Walker, H. and Garcia-Rios, S.                    |             |
|                                           | "Why Individual-Level Opinion Rapidly Shifted Against Trump's 'Muslim Ban' Executive Order." <b>Religion in Public</b> (17 January, 2018). w/ Collingwood, L. and Lajevardi, N.                                                            |             |
|                                           | "Allies in name only? Latino-only leadership on DACA may trigger implicit racial biases among White liberals." <b>LSE American Politics and Policy Blog</b> (28 September, 2017). w/ Garcia-Rios, S. and Walker, H.                        |             |
|                                           | "Protests against Trump's immigration executive order may have helped shift public opinion against it" <b>LSE American Politics and Policy Blog</b> (12 February, 2017). w/ Collingwood, L. and Lajevardi, N.                              |             |
| Grants,<br>Fellowships,<br>& Awards       | Nominee of UD's Excellence in Teaching Award                                                                                                                                                                                               | (2023)      |
|                                           | UD Provost Teaching Fellow                                                                                                                                                                                                                 | (2022-2025) |
|                                           | APSA Race, Ethnicity, and Politics Best Paper Award<br>w/ N. Lajevardi, H. Walker and A. Westfall                                                                                                                                          | (2019)      |
|                                           | AAPOR Student-Faculty Diversity Pipeline Award                                                                                                                                                                                             | (2019)      |
|                                           | CTAL Instructional Improvement Grant: Engaging Diversity<br>in Political Science w/ Kara Ellerby (\$11,000)                                                                                                                                | (2018)      |
|                                           | POSCIR Seed Research Grant (\$1,500)                                                                                                                                                                                                       | (2018)      |

|                                           |                                                                                                                                                                                                                                                                                                                     |           |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
|                                           | DEL General University Research Grant (\$7,500)                                                                                                                                                                                                                                                                     | (2017)    |
|                                           | UW Political Science Research Fellowship (est. \$13,000)                                                                                                                                                                                                                                                            | (2016)    |
|                                           | Dissertation Improvement Research Grant, UCLA (\$3000)                                                                                                                                                                                                                                                              | (2015)    |
|                                           | Dean Recognition for Exceptional Pedagogical Contribution, UW                                                                                                                                                                                                                                                       | (2014)    |
|                                           | Best Graduate Paper in PoliSci (w/Hannah Walker), UW                                                                                                                                                                                                                                                                | (2014)    |
|                                           | UW Center for Democracy & VRA Research Fellowship (\$5,000)                                                                                                                                                                                                                                                         | (2014)    |
|                                           | UW Center for Democracy & VRA Research Fellowship (\$5,000)                                                                                                                                                                                                                                                         | (2013)    |
|                                           | Center for Statistics and the Social Sciences Grant (\$1,000)                                                                                                                                                                                                                                                       | (2013)    |
|                                           | UW WISER Research Grant (\$2500)                                                                                                                                                                                                                                                                                    | (2011-14) |
|                                           | UW WISER Survey Research Fellowship (\$20,000)                                                                                                                                                                                                                                                                      | (2011-14) |
|                                           | Grad. Opportunities & Minority Achievement Fellowship (\$4,000)                                                                                                                                                                                                                                                     | (2010-11) |
|                                           | Donald R. Matthews Graduate Fellowship (\$40,000)                                                                                                                                                                                                                                                                   | (2010-11) |
|                                           | Jody Deering Nyguist Award for Excellence in Public Speaking                                                                                                                                                                                                                                                        | (2008)    |
| Research Center/<br>Academic Affiliations | Data Science Institute (DSI), UD                                                                                                                                                                                                                                                                                    | (2023 - ) |
|                                           | Master of Science in Data Science (MSDS), UD                                                                                                                                                                                                                                                                        | (2023 - ) |
|                                           | Center for Political Communication, UD                                                                                                                                                                                                                                                                              | (2016 - ) |
|                                           | Center for the Study of Diversity, UD                                                                                                                                                                                                                                                                               | (2016 - ) |
|                                           | Race, Justice, Policy Research Initiative, UD                                                                                                                                                                                                                                                                       | (2017-20) |
|                                           | UW Center for Democracy and Voting Rights Research                                                                                                                                                                                                                                                                  | (2013-14) |
|                                           | Washington Institute for the Study of Race & Ethnicity (WISER)                                                                                                                                                                                                                                                      | (2010-16) |
|                                           | Center for Social Science and Statistics (CSSS), UW                                                                                                                                                                                                                                                                 | (2010-16) |
|                                           | Washington Survey Research Center (WASRC)                                                                                                                                                                                                                                                                           | (2010-15) |
| Teaching Experience                       | <b>University of Delaware</b> (2016 - )                                                                                                                                                                                                                                                                             |           |
|                                           | POSC 150: Intro to American Politics (x13)                                                                                                                                                                                                                                                                          |           |
|                                           | POSC 230: Intro to Politics and Social Justice (x2)                                                                                                                                                                                                                                                                 |           |
|                                           | POSC 413: Minority Politics, Representation, and Voting Rights (x4)                                                                                                                                                                                                                                                 |           |
|                                           | POSC 867: Race, Ethnicity, and Politics (Graduate Seminar) (x3)                                                                                                                                                                                                                                                     |           |
|                                           | POSC 807: American Political Behavior (Graduate Seminar) (x3)                                                                                                                                                                                                                                                       |           |
|                                           | <b>University of Washington</b> (2011-2016)                                                                                                                                                                                                                                                                         |           |
|                                           | POLS 202: Intro to American Politics (x2)                                                                                                                                                                                                                                                                           |           |
|                                           | POLS 357: Minority Representation and the Voting Rights Act (x1)                                                                                                                                                                                                                                                    |           |
|                                           | POLS 205: Political Science as a Social Science (TA)                                                                                                                                                                                                                                                                |           |
|                                           | POLS 317: US Race and Ethnic Politics (TA)                                                                                                                                                                                                                                                                          |           |
|                                           | POLS 353: US Congress (TA)                                                                                                                                                                                                                                                                                          |           |
|                                           | POLS 503: Advanced Research Design and Analysis (TA)                                                                                                                                                                                                                                                                |           |
|                                           | LAW E 558: Voting Rights Research and the Law (TA)                                                                                                                                                                                                                                                                  |           |
| Select External Invited Talks/Panels      | "Pernicious Prejudice: Scholarly Approaches to Antisemitism and Islamophobia." <b>Harvard University</b> . Panel Cosponsored by the Edmond & Lily Safra Center for Ethics, Center for Jewish Studies, Center for Middle Eastern Studies, Center for American Political Studies, and FAS Civil Discourse Initiative. |           |

May 1, 2024.

“Diversity and the State of Democratic Citizenship.” Featured invited roundtable sponsored by the **Center for the Study of Democratic Citizenship**. April 23, 2021.

“Shocks to the System: Capturing Opinion Shift and Stability Toward Trump’s Muslim Ban.” Keynote Speaker at the Democracy and Diversity Triannual Conference at the **Center for the Study of Democratic Citizenship** in Montreal, Canada. April 24-25, 2020. [Cancelled Due to COVID-19]

“The New American Electorate.” Panelist. **Princeton University**. Event sponsored by the Center for the Study of Democratic Politics. April 3, 2020. [Cancelled Due to COVID-19]

“Neighboring Identities: Psychological and Political Reactions to Generalized and Particularized Anti-Immigrant Appeals.” w/Sergio Garcia-Rios. **University of Toronto**. Talk Sponsored by the Department of Political Science. March 6, 2020.

“History, Institutions, and Theory Research Coordination Network on Racial and Ethnic Politics.” Panelist. **University of Pennsylvania**. Event sponsored by the American Political Science Association’s Special Projects Fund and the Center for the Study of Ethnicity, Race and Immigration at Penn. February 28-29, 2020.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **Rutgers University**. Talk sponsored by the Emerging Trends Lecture Series & the Center for the Experimental Study of Politics and Psychology. April 27, 2018.

“A Change of Heart? Using Panel Designs to Establish Causality with Real Events.” w/Loren Collingwood. **Princeton University**. Talk sponsored by the Center for the Study of Democratic Politics. April 26, 2018.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **University of California Los Angeles**. Talk sponsored by the Race, Ethnicity and Politics Workshop. March 5, 2018.

“Muslim-American Attitudes, Sociopolitical Behavior, and Identity.” Panelist/Section Presenter. **University of California Los Angeles**. Event sponsored by the Luskin School of Public Affairs & the National Science Foundation. December 15, 2017.

“Muslim-American Political Behavior.” Panelist/Section Presenter. **Menlo College**. Event sponsored by Menlo College & the National Science Foundation. December 16, 2016.

|                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Select Internal<br>or Public<br>Invited<br>Talks/Panels | <p>“American Presidency and Political Power.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. June 21, 2024.</p> <p>“How Democratic is the U.S. Constitution, and to What Extent did the Founding Fathers Oppose Majority Rule?” Speaker. University Day Public Lecture. March 18, 2023.</p> <p>“Executive Power and the U.S. Democracy.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. July 13, 2023.</p> <p>“Executive Power and the U.S. Democracy.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. July 2022.</p> <p>“Race, Ethnicity, and Gender in the 2020 Election.” Speaker. Panel sponsored by the University of Delaware POSCIR. December 14, 2020.</p> <p>“Building Community: Scholarship and Connection among Faculty of Color.” Speaker. Panel sponsored by the Center for the Study of Diversity (CSD) at the University of Delaware. February 24, 2020.</p> <p>“Executive Power and the U.S. Democracy.” Talk sponsored by the 2019 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2019.</p> <p>“Opinion Shift and Stability: Long-Lasting Opposition toward Trump’s Muslim Ban.” Talk sponsored by the Department of Sociology and Criminal Justice Colloquium Speaker Series at the University of Delaware. April 24, 2019.</p> <p>“Old-Fashioned Racism and the Roots of Contemporary Islamophobia.” Talk sponsored by the Center for the Study of Diversity (CSD) Colloquium Speaker Series at the University of Delaware. December 6, 2018.</p> <p>“Understanding Executive Power in the United States.” Talk sponsored by the 2018 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2018.</p> <p>“The Inclusion and Exclusion of Minority Groups in the United States.” Talk sponsored by the 2017 YALI Mandela Washington Fellows Program at the University of Delaware. July 11, 2017.</p> <p>“Inclusion and Exclusion: Perceptions of Discrimination in the Workplace.” Diversity Summit Presenter. Talk sponsored by the Office of Equity and Inclusion at the University of Delaware. June 20, 2017.</p> |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

“What Happens Now Part II? A Forum to Discuss Bigotry & Closed Borders in the Trump Era.” Speaker. Panel sponsored by the Department of Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, & the College of Arts and Sciences at the University of Delaware. February 13, 2017.

“Forum on the Travel Ban Executive Order.” Speaker. Panel sponsored by the University of Delaware Provost Office. February 7, 2017.

“What Happens Now Part I? Fear, Diversity, and Inclusion in Post-U.S. Election.” Speaker. Panel sponsored by Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, History, & the College of Arts and Sciences at the University of Delaware. November 30, 2016.

“Race, Religion, and Gender.” Election Central Panelist. Event sponsored by the Center for Political Communication at the University of Delaware. November 8, 2016.

Select Papers at  
Conferences

2024

“Motivated Misperceptions and Public Opinion about Abortion” Paper Presentation (Lead, Dr. Cassese) at the Annual American Political Science Association Conference (APSA)

2021

“Partisan Winners and Losers: Testing Alternative Frames of Congressional Election Results Among White and Latino Voters.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“How do Political Attacks Affect Racial and Ethnic Self-Identities?” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

2019

“The Significance of Politicized Group Identities: Re-examining the Relationship between Contact with Punitive Political Institutions and Political Participation.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Threat or Reassurance? Framing Midterm results among Latinos and Whites.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“When American Identity Trumps Latinx Identity: Explaining Support for Restrictive Immigration Policies.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Anti-Minority Politics and Political Participation: Evidence from Four Countries.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

2018

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Symposium on the Politics of Immigration, Race, and Ethnicity (SPIRE) Meeting in Philadelphia, PA (University of Pennsylvania).

“Are Integrated Muslim Americans More Likely to Perceive Discrimination?” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Opinion Shift and Stability: Enduring Individual-Level Opposition to Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Collaborative Multiracial Post-Election Study (CMPS) Meeting in Los Angeles, CA (UCLA).

2017

“A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“Veiled Politics: Experiences with Discrimination among American Muslims.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“The Racial Shield as Racism Exoneration: Explaining White Racist Support for Conservative Minority Candidates.” Paper Presentation at the Annual

Western Political Science Association Conference (WPSA) in Vancouver BC, Canada.

2016

“Assessing the Mechanism Linking Discrimination to Democratic Engagement.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Philadelphia, PA.

“Estimating Candidate Support: Comparing EI and EI-RxC.” Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA) in Chicago, Illinois.

Select Student  
Supervision

Sadie Ellington, Dissertation Committee Member (POSC)  
Enes Aksu, Dissertation Committee Member (POSC)  
Enes Tuzgen, Dissertation Committee Member (POSC)  
Olga Gerasimenko, Dissertation Committee Member (POSC)  
Furkan Karakayan, Dissertation Committee Member (POSC)  
Richard Takyi Amoah, Dissertation Committee Member (ECON)  
Sheila Afrakomah, Dissertation Committee Member (ECON)  
Ahmet Ates, Dissertation Committee Member (POSC)  
Charles Mays, Long Paper and Dissertation Chair (POSC)  
Ian Mumma, Long Paper Committee Member (POSC)  
Clark Shanahan, Long Paper Committee Member (POSC)  
Natalie Standridge, Long Paper Committee Member (POSC)  
Fahmida Zaman, Research Assistant Supervisor (POSC)  
Lola Bessis, Independent Research Supervisor (POSC)

Rachel Spruill, Undergraduate Honors Thesis Chair  
Sativika Kadiyala, Undergraduate Summer Scholars Advisor  
Jessica Sack, Undergraduate Honors Thesis Chair  
Jordan Spencer, Undergraduate Faculty Mentor for the McNair Program  
Lauren Turenchalk, Undergraduate Research Supervisor

Professional  
Service

**Editorial Board Member**

*Politics and Religion* (6/2018 - 12/2021)

**Select Discipline Service**

American Political Science Association (APSA) REP Section Executive Council (2025-2027)

American Political Science Association (APSA) REP Section Conference Chair (2021-2022)

Western Political Science Association (WPSA) Task Force on Equity, Inclusion, and Access in the Discipline (2020-2021)

American Political Science Association (APSA) REP Best Paper Award Committee Member (2020)

**Select University Service**

College of Arts & Sciences Senator (2025)  
Community Engagement Scholars Faculty Review Board Member (Winter/Spring 2022)  
Summer Educational and Cultural Experience Program (SECEP)  
Lecturer of Politics and Justice in the United States. (July 27 - August 20, 2019)

**Select Department Service Roles**

Director of Graduate Admissions & Funding  
Director of Undergraduate Internships  
Executive and Advisory Committee Member  
Member of Hiring Committees  
Faculty Review Committee Member  
Graduate Placement Committee Chair  
Academic Program Review Steering Committee Member  
Academic Program Review Response Committee Member  
Undergraduate Advising (Standard Annual Load)  
Diversity, Equity, and Inclusion Committee Member  
New Minor Development Committee Member  
Social Science Sponsored Research Committee Member

**Manuscript Reviewer/Referee**

*American Journal of Political Science, American Political Science Review, American Politics Research, British Journal of Political Science, Belgian Federal office for Science Policy, Behavioral Sciences of Terrorism and Political Aggression, Cambridge University Press, Electoral Studies, European Journal of Political Research, European Political Science Review, International Journal of Public Opinion, Journal of Elections, Public Opinion & Parties, Journal of Ethnic and Migration Studies, Journal of Public Policy, Journal of Politics, Journal of Race, Ethnicity and Politics, Journal of Women, Politics & Policy, Migration Studies, Perspectives on Politics, Political Behavior, Politics, Groups, and Identities, Political Psychology, Political Research Quarterly, Politics and Religion, Political Studies Review, PS: Political Science & Politics, Public Opinion Quarterly, Social Science Quarterly, Time-Sharing Experiments for the Social Sciences*

**Conference Coordination**

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Delaware. (2020)

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Washington. (2013)

Latinos and the Voting Rights Act. Center for Democracy and Voting Rights Research at the University of Washington Law School. (2013)

Islam in the Public Sphere Conference. Washington Institute for the Study of Race & Ethnicity (WISER). (2011)

Select Expert  
Consulting  
Experience

*State of Maryland Attorney General's Office*; 2021 MD Redistricting

*Baltimore County Branch of the NAACP v. Baltimore County, Maryland*, No. 1:21-cv-03232-LKG (D. Md. 2022)

*Common Cause Florida v. Lee*, 4:22-cv-109-AW-MAF (N.D. Fla.)

*Common Cause Florida v. Byrd*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed]

*Dickinson Bay Area NAACP Branch v. Galveston County, Texas*, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified]

*Reyes v. Chilton*, 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed]

*Roswell Independent School District (RISD)*; 2022 Redistricting

*Caroline County Branch of the NAACP v. Town of Federalsburg*, Civ. Action No. 23-SAG-00484 (D.Md. 2023)

*Cobb County Board of Elections and Registration*, No. 1:22-cv-02300-ELR (N.D. Ga. 2022)

*Coca v. City of Dodge City, et al.* Case no. 6:22-cv-01274 (D Kan. 2022) [Deposed & Testified]

*Soto Palmer v. Hobbs*, No. 3:22-cv-05035-RSL (W.D. Wash. 2021) [Testified]

*Stone v. Allen*, No. 2-21-cv-1531 (N.D. Ala. 2021) [Deposed & Testified]

*Wicomico County Branch of the NAACP et al v. Wicomico County, MD,*  
Civ. Action No. 23-MJM-03325 (D. Md. 2023)

*New York Communities for Change et al v. County of Nassau, NY,* No.  
602316/2024 (N.Y.S.) [Deposed & Testified]

*NC NAACP et al v. Berger et al,* No. 23-cv-1104 (M.D. NC. 2023) [De-  
posed & Testified]

*League of Women Voters of Utah, et al. v. Utah State Legislature, et al.,*  
No. 220901712/2022 (Utah 3rd Dist. Ct.) [Testified]

|                                       |                                                                                                                                                                                                                                 |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Previous<br>Research<br>Positions     | <b>Senior Researcher, Washington Poll</b> 2010-2014<br><i>Public Opinion Survey Design, Programming, and Analysis.</i>                                                                                                          |
|                                       | <b>Researcher, Center for Democracy &amp; Voting Rights Research</b> 2013-2014<br><i>Racially Polarized Voting (RPV) Analysis of jurisdictions in states such as:<br/>California, Florida, Texas, and Washington.</i>           |
|                                       | <b>Investigator, Washington State Charter School Initiative</b> 2013<br><i>Precinct and school district level data collection and analysis<br/>of the I-1240 Vote for S360 Polling Firm and Melinda &amp; Gates Foundation.</i> |
| Skills &<br>Additional<br>Information | <b>Software:</b> R, STATA, $\text{\LaTeX}$ , ESRI, DRA<br><b>Languages:</b> Farsi (Persian)–Native Speaker<br><b>R Packages:</b> eiCompare (contributor), eiExpand (contributor)                                                |

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**SECOND DECLARATION OF DAWN DALY-MACK**

October 31, 2025

I, Dawn Daly-Mack, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a Plaintiff in this lawsuit. I previously provided a standing affidavit on May 21, 2025, in this lawsuit. I also testified during the trial on June 17, 2025. All of my previous testimony remains true and correct to the best of my knowledge.

2. I am registered to vote in Northampton County. I voted for Congressman Don Davis and presidential candidate Kamala Harris in 2024. I intend to vote here in the future.

3. After the trial in this lawsuit, the North Carolina General Assembly passed Senate Bill 249, which redrew the boundaries of Congressional District 1 and Congressional District 3. As before SB 249, I continue to reside in Congressional District 1.

4. I opposed SB 249 because it will break up longstanding community ties within the Black Belt and imposes a direct threat to the voting power of Black communities. I would have liked to speak out against the Bill in-person, but I was unable to make it to the Capitol for the few public hearings that were held. I live several hours away and have a full-time job as a care manager and registered nurse.

5. I submitted a public comment online expressing strong opposition to SB 249. I shared that as a Northampton County resident, healthcare professional, advocate, community organizer, and a Black woman and proud voter who believes in the power of representative democracy, this Bill erases representation for Black communities and undermines democracy. If you live in North Carolina, you do not need to look at data to know that this Bill targets Black voters.

6. As Branch President of the Northampton NAACP, I have spent extensive time organizing with my community. This has included registering voters, helping with get-out-the-vote phone banking, door knocking, giving rides to the polls, and organizing the Party at the Polls event, including for congressional elections. I am also passionate

about improving health equity in my community, including by addressing poor access to health care, mental health services, and healthy foods.

7. I know the current representative for Congressional District 1, Congressman Don Davis, personally. I have advocated to him on issues affecting my community, including about health inequities, which I know he is working on addressing.

8. Congressman Davis has roots in our community and shows up to make sure he is accessible to constituents in the District. He frequently attends events in Northampton County and other areas of the Black Belt in the northeastern part of North Carolina. For example, he recently attended a Deacon's 100<sup>th</sup> birthday at the church where I am a minister. Like many other constituents, I can contact Congressman Davis by phone, email, and at his Rocky Mount office. I often contact his assistant for this area who used to work at a local community college, and she puts me in touch with the Congressman. As the President of the Northampton Chapter of the NAACP, minister at my church, and community organizer, I know that many other people in my community can advocate to Congressman Davis, and he is similarly responsive to them.

9. I am aware that Congressional District 1 now includes counties on the eastern edge of the State, including Carteret, Hyde, and Dare counties. Communities in that part of the state have little in common with communities in the Black Belt where I live. People in my community are extremely concerned about losing their SNAP benefits and addressing the day-to-day needs of lower- to middle-class folks. Many areas in my part of the State are predominantly Black.

10. In contrast, the counties that were added to Congressional District 1 in 2025 are mostly White and more affluent. Voters in those newly added counties generally do not share the same concerns as people in the Black Belt, which is reflected in who they have voted for in past elections.

11. I fear that with the district changes in SB 249, Black voters in Congressional District 1 don't stand a chance of electing someone responsive to us. I expect that under this new map, Congressional District 1 will be represented by someone like Bobby Hanig, who is my current State Senator. I know that Senator Hanig is not responsive to the needs of our community because I have not seen him at events or candidate forums; I have only seen his postcards in my mail.

12. The congressional map enacted in 2023 already made it more difficult for Black voters to elect a candidate responsive to us. I fear the new districts drawn in 2025 now make that impossible.

13. I believe SB 249 is an attempt to punish voters like me in Congressional District 1 for daring to file a lawsuit against the map passed in 2023. This sets an ugly precedent by silencing Black voters through discriminatory maps and punishing us for speaking out against them.

14. SB 249 makes it harder to organize and advocate for Black communities by moving the district lines again and depriving us of a chance to elect a candidate responsive to our needs. Redrawing district lines every two years and punishing voters who challenge those new maps prevents Black communities from organizing together to build power, because any connections we form might be split by a new district within months.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10/31/25

Dawn Daly-Mack  
Dawn Daly-Mack

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**SECOND DECLARATION OF SYENE JASMIN**

October 31, 2025

I, Syene Jasmin, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I previously provided a standing affidavit on May 21, 2025 in this matter. I also testified during the trial in this matter, on June 18, 2025. All of my previous testimony is still true and correct to the best of my knowledge.

2. Since testifying at trial, the North Carolina General Assembly has passed SB 249, redrawing the lines of Congressional Districts 1 and 3. Under this new map, I still reside in Congressional District 3.

3. I was opposed to the 2025 redraw of Congressional Districts 1 and 3, and I wanted to voice my concerns publicly. No community hearings were held, and due to the rushed process I was not able to travel from Winterville in Pitt County to speak out against the maps in person as I would have preferred. Instead, I submitted a comment through the public comment portal provided.

4. In my public comment I expressed my view that that the process was rushed and inadequate to capture community input. I also shared my belief that the new maps further dilute Black voting power by depriving Black voters like myself of the opportunity to elect candidates that reflect our values. Finally, I shared that, as a Plaintiff in this litigation, I felt that the targeting of Districts 1 and 3 while challenges against them are still pending in court was designed to undermine our litigation and waste the valuable time and resources of our communities. I do not feel that my comments or the comments of my community members were considered in the process

5. Much like the 2023 maps, this 2025 redraw sends the message to my community that we do not really matter. It further divides communities that I knew to be aligned when I was a member of Congressional District 1, and it seems mathematically impossible for Black voters like me in Congressional District 3 to elect a candidate of our choice.

6. I participated in non-partisan Get-Out-the-Vote (“GOTV”) efforts previously in elections where Representative Don Davis was a candidate. I did so in 2022 when I was in

CD 1, and then also in 2024 when I was no longer in CD 1. It was much easier to do that work when I was still in CD 1 – voters I spoke to felt confident they could elect somebody who they knew from our community and were motivated to turn out. Despite being in CD 3, I still tried to do GOTV work in parts of CD 1 in 2024, but I felt it was more difficult. Because of the way the structure the district had changed, Black voters felt it would be harder for the district to elect him, and that as a result Rep. Davis could no longer be as forceful an advocate for Black voters. Under the new changes from the 2025 map drawing, I fear this will become even worse. Additionally, I do not think it will be feasible for me to continue engaging in GOTV efforts in all of the counties that now make up CD 1, given that I am no longer in that district and now how to focus on building power in my own.

7. As an organizer in my community, I know that it will be even more difficult to convince people to engage in the political process after this mid-decade redistricting. The decision to undertake mid-decade redistricting to further weaken my community's political power instead of taking on critical issues like Medicaid services or access to food vouchers is incredibly disingenuous, insensitive, and demoralizing. Voters are unable to focus on these and other core issues while their district lines are constantly changing and they are so overwhelmed by these political games that they do not even see the point of trying to meaningfully engage in the process.

8. As the lines keep changing, it is hard to know which representatives to contact and which communities to work with when seeking to organize and build power around environmental and other issues. For example, it will be more difficult to combat the environmental issues that new data centers pose to our community without knowing who to approach. I used to be able to go directly to Rep. Davis to speak on these issues, and I could raise these concerns through community meetings as well. In my new district, I no longer have that ability.

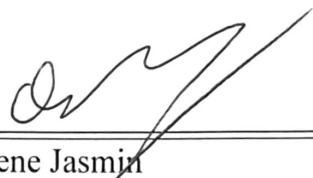
9. Another issue that is important to me is gun violence and advocacy for community bound intervention funding. Through our discussions I understood that Rep. Davis, like me, viewed gun violence as a public health issue and was more likely to work on these

issues in his community. I do not feel confident that I can approach my new representative related to these issues either.

10. As an Eastern Carolina voter who chose to step forward to represent my community, I feel that my entire Eastern Carolina community is being retaliated against through the enactment of these maps for trying to stand up for our right to elect accountable and representative candidates of our choice. If the General Assembly is allowed to change our congressional district lines mid-decade without any court order or other rational justification, it completely undermines the ability of concerned community members like myself to bring a lawsuit and seek relief from the harm done when my community is discriminatorily carved and our voting strength diluted. It makes me ask myself: if they are allowed to do this, why did I bring a lawsuit? Will we ever have a chance to really challenge maps in federal court before they are used in an election?

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10/30/25

  
\_\_\_\_\_  
Syene Jasmin

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**SECOND DECLARATION OF CALVIN JONES**

October 31, 2025

I, Calvin Jones, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a Plaintiff in this lawsuit. I previously provided a standing affidavit on May 19, 2025, in this case. I also testified at trial on June 17, 2025. All of my previous testimony remains true and correct to the best of my knowledge.
2. I am registered to vote and in Warren County and intend to vote here in the future.
3. In 2024, I voted for Congressman Don Davis and Vice President Kamala Harris.
4. After a trial in this case, the North Carolina General Assembly passed SB 249, which moves the boundaries of Congressional District 1 (CD 1) and Congressional District 3 (CD 3) again. I continue to reside in Warren County, which remains in CD 1.
5. I would have liked to attend the public hearings for SB 249, but I was not able to because I work a full-time job. I would have been able to use vacation time to attend the hearings if I learned about them with enough advanced notice. I also live several hours from Raleigh. I believe that holding few public hearings only on weekdays with little notice deters working people from participating in the legislative process.
6. I have lived in Warren County for most of my life. Advocating for my community is important to me to carry on the legacy of my parents, grandparents, and great-grandparents who advocated for Black Americans' civil rights.
7. I know Congressman Davis, who represents CD 1, because he consistently attends community events in the district. Congressman Davis is well known by other constituents in communities in the Black Belt, and he knows constituents by their first name. I have attended many events with Congressman Davis, including a town hall in Warren County in February 2024 and a Juneteenth Celebration this year at the Warren County Courthouse. At these events, he has addressed constituents' concerns and I have formed connections with other community members who share some of my concerns about resources for farmers and local schools.

8. I have advocated to Congressman Davis about devoting federal resources to my community. For example, I have received funding from the U.S. Department of Agriculture (USDA) to build hoop houses on my farm. For a while, the federal reimbursement rate for hoop houses lagged behind the market rate, which meant I had to cover the difference, which was about \$2,000. I had conversations with other farmers in my community who experienced the same problem. We organized together and I brought these concerns to the attention of Congressman Davis several times at different town halls and community events. After we brought this issue to his attention, the reimbursement rate for hoop houses increased so we were not forced to cover the difference. I have since been reimbursed for the out-of-pocket expenses I paid for hoop houses, which has helped keep my farm afloat.
9. I also helped recruit people in my community to lobby Congressman Davis for funding to improve our community center in Warrenton. During Jim Crow, Black people went to Warrenton to shop but were not allowed by White store owners to use the bathrooms. This is why there is a community center in Warrenton today, and it remains a central meeting place for people in Warren County. Along with other community members, we successfully obtained funding to rehabilitate the community center after raising the issue with Congressman Davis.
10. Farmers in my community are now facing another issue with funding from the USDA. Because of the federal government shutdown, I have not received the second installment payment for a hoop house that I recently hired a contractor to install. I have taken out a personal loan to pay the contractor and will pay interest on the loan until I receive the second payment from the USDA. I fear that I will not have a representative who would be responsive to these issues if SB 249 remains in place.
11. I have longstanding connections with NAACP members and other community members in parts of the Black Belt that were removed from CD 1. I worked with leaders from Greene County when I served as the President of the North Carolina Black Caucus of School Board Members. Greene County is about a one-and-a-half-

hour drive from where I live and is a core part of the Black Belt. Congressman Davis has held regional meetings in Greene County, and I have formed connections with other community advocates and organizers at those events. I have also built business relationships with people from Greene County. I have drawn on this network across the Black Belt, including in Greene County, to advocate for funding for farmers and schools. After SB 249, I cannot effectively rely on this network in Greene County to organize and advocate for CD 1 constituents, because Greene County is now in CD 3.

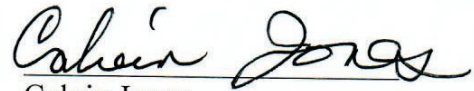
12. I am aware that CD 1 now includes counties on the eastern coast of North Carolina with communities that have little in common with mine and others nearby in the Black Belt. It is at least a three-hour drive from my home to counties added to CD 1, such as Carteret and Hyde counties. Those communities have different priorities, as they are generally more well-resourced and less focused on farming than those near me in the Black Belt.
13. SB 249 makes it harder to recruit new NAACP members and engage with communities in CD 1. It took years to build connections with people in Greene County and other areas of the Black Belt to advocate for our communities' needs. To build relationships in the counties that were just added to CD 1 will take time, especially given the distance it takes to travel across the state to those new parts of the District. I expect that I will be treated like a telemarketer if I try to make inroads in those eastern counties, because I have no existing ties there. Even the most effective communicator would struggle to form new ties to advocate for communities and build power when facing new maps every year or two.
14. It is also harder to recruit NAACP members and organize people to register and educate voters if people know their vote won't matter. I have encountered an apathetic attitude towards voting before, and SB 249 will make it worse because it is clear our voice in the democratic process is being silenced.

15. We don't have a fighting chance for fair representation under SB 249. If we can't band together for a representative who will speak for us in Congress, then our views won't get to committee, much less be voted on.

16. I view SB 249 as retaliation for speaking out and filing a lawsuit against the maps passed in 2023. I expect this will deter others in my community from advocating for our civil rights.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10-31-2025

  
Calvin Jones

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**DECLARATION OF ARTHUR LEE JOHNSON**

October 30, 2025

I, Arthur Lee Johnson, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. My name is Arthur Lee Johnson, and I reside at 3101 Plum Drive North, Wilson NC, 27896 in Wilson County. I have resided at this residence for approximately thirty years. I reside in current Congressional District 3.

2. I identify as Black.

3. I have been registered to vote and regularly voting in the state of North Carolina for more than thirty-five years. I vote in nearly every election and believe there is no such thing as an “off year” for voting.

4. Voting is critical to me because I believe that our vote is our voice. It took so much for Black people to secure the right to vote, and it is a right we must continue to exercise. I encourage others in my community to vote to honor that history and because it is our only choice to make sure that our representatives are actually representative of our community.

5. In the 2024 General Election, I voted in Congressional District 1. I cast my votes in that Election for Representative Don Davis and former Vice President Kamala Harris. Prior to 2024, I had been in Congressional District 1 for as long as I can remember. Before voting for Representative Don Davis to serve his first congressional term, I voted for many years for former CD 1 Representative G.K. Butterfield.

6. I have been a member of the NAACP for about 18 years. Currently I am the Wilson Branch President. From 2021 to 2023, I was the NC NAACP District Director for a Northeastern region of the state branch, serving Wilson, Edgecombe, Halifax, Bertie, Northampton and Hertford counties.

7. In my various roles with the NAACP I have worked on a variety of issues for my community including, for example, healthcare and drug rehabilitation, domestic violence awareness, gun violence awareness for young adults, and education equity. I have also from time to time voiced my opinion through actions at the North Carolina General Assembly.

Because of the critical importance of voting, one constant focus of my work with the NAACP over the years has been voter registration and Get Out the Vote (“GOTV”) work.

8. My NAACP branch has engaged in GOTV work during elections involving Rep. Davis. For example, in 2024 we ran a five-to-six-week GOTV campaign in Wilson and Wayne counties that included door-to-door canvassing, phone calls aimed at turning community members out to vote, and voter registration drives. Though I remain non-partisan in my GOTV work associated with the NAACP, I certainly noted for community members the issues on which Rep. Davis’s stances aligned more closely with NAACP stances.

9. While I have not agreed with Rep. Davis on every stance that he has taken, I have always felt that he is accessible and willing to listen to the voices of his constituents. This accessibility is important to me and my community to ensure that our interest are actually represented in Congress.

10. In the past I have been able to meet with Rep. Davis at town halls and in various zoom calls through which community members have been able to voice their concerns on issues important to our area of the state, such as gerrymandering and the SAVE Act (a piece of federal legislation that would make voting more difficult). In these calls I have been able to pass along concerns and perspectives of our membership and other community leaders with whom I am in contact. In certain circumstances, like with the SAVE Act, he has been open to changing his mind after hearing from his constituents. I appreciate that he seems to try to be responsive to the needs of the Black community and his district as a whole.

11. Just prior to the 2025 mid-decade redistricting, I had been coordinating with Rep. Davis’s office to set up a town hall in Wilson at one of our local NAACP Wilson Branch meetings. Now that we have been removed from his district, it is no longer clear to me if Rep. Davis will continue to be accessible to us, or if it is still worthwhile to set up this town hall. I have put these plans on hold indefinitely.

12. In my many years living, working, and organizing in CD 1, and especially through my time as District Director, I developed a large network of NAACP leaders and community members in counties like Edgecombe, Martin, Bertie, and others, with whom I share common interests, needs, and priorities, and with whom I could work toward common goals in our advocacy. I felt that together we were able to make our voice heard by our elected representatives and make change in our community.

13. Now that I have been moved to CD 3, I have been removed from that network and community that I have spent years helping to build. I have never voted in CD 3 before. I do not know whether I share any common interests or needs with Jones, Onslow, Duplin, Sampson or the other counties in CD 3 because I simply do not know them. They are not my community, and my impression is that they do not care about my issues.

14. Organizing in CD 1, in the community I spent so long building, no longer seems feasible to me now that I have been removed. In order to build up the type of community I had cultivated in CD 1 in CD 3, I feel that I would have to build it from the ground up. At this point, I do not even know who will be running in this district. The community members I speak to who have also been moved out of CD 1 are overwhelmed and confused by the sudden change and about who represents them. Though I will try my best, these challenges feel insurmountable for my future organizing efforts in this moment.

15. I have no relationship with Rep. Greg Murphy and based on my knowledge of his positions, I have concerns that he would not be responsive to my needs or the needs of the other Wilson County voters who share my interests and have been moved out of CD 3. From my perspective, the new makeup of CD 3 encourages Rep. Murphy to be more responsive to those constituents whose interests are more similar to those of his current constituents, and our differing needs will go unheard.

16. Before the 2025 mid-decade redistricting, I felt that I had built power in my community and could ensure that – even if our representative did not always agree with or vote consistent with our position – our concerns could be expressed, our perspectives were

considered, our voices were heard. Now we feel our voice is silenced. It has been taken from us.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: October 30, 2025



Arthur Lee Johnson

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**DECLARATION OF BARBARA SUTTON**

October 31, 2025

I, Barbara Sutton, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. My name is Barbara Jean Sutton. I live in Kinston, North Carolina. I have lived in Lenoir County all my life.
2. I identify as Black.
3. I am registered to vote and am a longtime voter in Lenoir County. Since 2023, I have resided and voted in Congressional District 1 (CD 1). I now reside in Congressional District 3 (CD 3) because SB 249 moved me from CD 1 to CD 3.
4. I intend to vote in Lenoir County in the future.
5. In the 2024 general election, I voted for Congressman Don Davis to represent CD 1 and former Vice President Kamala Harris for President.
6. I have been a member of the North Carolina State Conference of the NAACP since 2015. I have been the President of the Kinston Lenoir Chapter of the NAACP since 2019. I also serve on the Executive Committee of the North Carolina State Conference of the NAACP.
7. I know Congressman Davis and have seen his responsiveness to constituents firsthand. He does not always agree with every constituent, and not every constituent always agrees with him, but he listens to our communities.
8. Congressman Davis has spent extensive time meeting constituents in Lenoir County, including at MLK Day and Juneteenth events. He makes a concerted effort to listen to the concerns of people in Lenoir County, and believes in the importance of engaging with youth, who represent our future.
9. I was invited to an event organized by Democracy North Carolina, where Congressman Davis listened to constituents' concerns about the SAVE Act, which was legislation Congress was considering that would have made it harder for many of us to vote. I listened to my neighbors share personal life stories to convey how

the SAVE Act would impact them, because many people do not have a birth certificate or similar documentation that matches their current legal name. Congressman Davis made clear before that meeting that he was planning to vote in favor of the SAVE Act. He ultimately voted against it, and I believe hearing directly from constituents was a big reason why. It was only because Congressman Davis was receptive to hearing our perspectives and took the constituents' concerns seriously that he voted to protect our civil rights in a major bill before Congress.

10. I have also attended a meeting organized by Congressman Davis for faith leaders in Congressional District 1, because he was seeking input on how to better serve faith-based communities.
11. As the President of the Kinston Lenoir Chapter of the NAACP, I have done extensive organizing to register, inform, and activate voters. Among our many nonpartisan voter education activities are regular candidate forums, family political nights, and the Do You Know campaign that we facilitate in the lead up to each election. Together with other NAACP members, I also help people exercise their right to vote through rides to register and rides to the polls.
12. My work with the NAACP to educate and activate voters has extended beyond Lenoir County to other neighboring counties in CD 1. For example, I work with Eastern North Carolina (ENC) Blueprint, a group of community organizers that meets twice a month to strategize on voter education and other pro-democracy initiatives. I have exchanged resources on voter education with people involved in ENC Blueprint, which has helped us all serve our communities. Through ENC Blueprint and the A. Philip Randolph Institute, I have built ties with other organizers and advocates in what used to be CD 1.
13. Because SB 249 moves Lenoir County into CD 3, my network of connections with other community advocates in the Black Belt region of what used to be CD 1 is severed. I will now have to change who I work with on a consistent basis and reach

out to form new connections in CD 3 to advocate for NAACP members and other people in Lenoir County.

14. In addition, other NAACP members and I will now have to travel further to get to counties in the southern part of CD 3 for voter registration, education, and get-out-the-vote efforts. Transportation is a significant barrier to mobilizing members of the Kinston Lenoir NAACP Chapter. It will be difficult for us to engage in get-out-the-vote efforts in parts of CD 3 that are hours away.

15. I am familiar with Congressman Greg Murphy, who represents CD 3, through news reporting. I have not built coalitional or personal relationships with him, as I have with Representative Davis. The same is true for many members of our NAACP chapter in Lenoir County.

16. SB 249 makes it harder to engage with voters who now think it is a waste of time to vote. Instead of voters choosing their representatives, there is an understanding that the line chooses them, which is made worse by SB 249.

17. I believe SB 249 was passed to show the power of the General Assembly over the people of North Carolina. Part of the NAACP's mission is to speak out against injustice. SB 249 is an effort to punish Black voters for speaking out against injustice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: October 31, 2025

A handwritten signature in cursive script, reading "Barbara Jean Sutton". The signature is written in dark ink and is positioned above a horizontal line.

Barbara Jean Sutton

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**DECLARATION OF COURTNEY MURRAY PATTERSON**

October 31, 2025

I, Courtney Murray Patterson, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I testified during the trial in this matter as a fact witness on June 18, 2025. All of my previous testimony is still true and correct to the best of my knowledge. I am now a Plaintiff in this matter.

2. I reside at 1105 Patterson Road, Kinston NC 28504, in Lenoir County. I have resided at this residence since 1978. I reside in current Congressional District 3.

3. I identify as Black/African American.

4. I have been registered to vote and regularly voting in the state of North Carolina since 1970.

5. Voting is important to me because we as a people in a democracy are and should be obligated to choose our elected officials. In my personal capacity and through my roles with the NC NAACP, Blueprint NC, and the Lenoir County Board of Elections, I have spent my life encouraging other members of my community in Eastern North Carolina to go vote. For the last sixty years I have done everything I can to register new voters, increase voter participation, and help voters understand the importance of fighting against suppressive measures designed to inhibit their ability to elect a candidate of their choice.

6. In the 2024 General Election, for the first time in my life, I voted in Congressional District 1. I cast my votes in that Election for Representative Don Davis and former Vice President Kamala Harris. Prior to 2024, I had been in Congressional District 3 for as long as I can remember, aside from a brief period of time when I was in Congressional District 7.

7. I have known Rep. Davis for many years, since his time as mayor of Snow Hill and through his time in the North Carolina General Assembly representing Pitt and Greene County. Over the years, through my work organizing in Eastern North Carolina, we have had various conversations on a variety of bills and developed a positive working

relationship. While I do not always see eye to eye with Rep. Davis on every issue, my impression is that he has been receptive to the needs of the Black communities he has represented.

8. In the short time that I was his constituent in CD 1, I was able to band together with my fellow constituents to lobby Rep. Davis to win his support on issues important to our community. A notable example of this is the work we were able to do regarding the SAVE Act (a piece of federal legislation that would make voting more difficult). I was able to get Rep. Davis on the phone fairly quickly to hear about his position, and shortly thereafter I helped to coordinate a zoom gathering with many of his close constituents to voice our opposition to the Act. When, walking away from that zoom gathering, his position in opposition to the SAVE Act still had not solidified, we were able to coordinate a calling campaign reaching about 17,000 of Rep. Davis's constituents, and additionally, about 140 calls were made directly his office in opposition to the bill. Ultimately, Rep. Davis voted in opposition to the SAVE Act. This effort may not have been as effective with a different representative who was not as invested in my community's values.

9. Now, only two years after the latest congressional redraw, I have been moved back into CD 3. While this move will not erode the relationships I have built over my lifetime in Eastern North Carolina, I will once again be advocating with Rep. Davis as an outsider, rather than a constituent.

10. While I am somewhat familiar with Representative Greg Murphy as a doctor from my community, I did not elect him. We do not have a relationship, and nothing I know about him makes me believe that that he will be responsive to the needs of my community.

11. I know from my extensive organizing work that during the last congressional redraw, many members of my community and our surrounding counties were deeply confused and dismayed by the sudden change of their district lines and representatives. They did not know what candidates were on their ballot or what information to look to. It took a lot of work to get voters familiar with the correct candidate. I know this re-education

work will have to happen again. Therefore, during the short 2025 redistricting process, I prioritized holding a virtual community meeting to bring public awareness to the redistricting process that was taking place rather than advocating against the plan directly with the General Assembly, and I have continued this community work since.

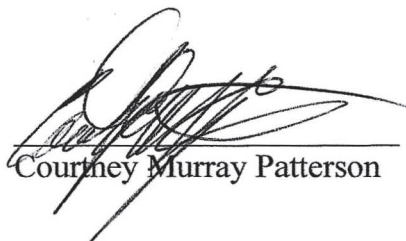
12. Through the conversations that I have had in my community since the mid-decade redraw and through my years of experience, I know that all of this work that voters have to undertake to wrap their head around what district they are in and who even represents them distracts from the issues that they care about and creates voter apathy.

13. I feel that this keeps happening by design – the General Assembly has targeted my area of the state for this mid-decade redraw in order to confuse and discourage people, and I believe that is happening as a punishment for the views they have expressed with their vote. It is going to take a lot more energy to try to overcome this discouragement in my GOTV efforts than would have been necessary had we not been targeted in this way.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on:

10/31/25



Courtney Murray Patterson

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**FOURTH DECLARATION OF DEBORAH DICKS MAXWELL  
PRESIDENT OF THE NORTH CAROLINA STATE  
CONFERENCE OF THE NAACP**

I, Deborah Dicks Maxwell, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am the President of the North Carolina State Conference of the NAACP, which is a Plaintiff in this lawsuit. I previously provided declarations on September 23, 2024, October 2, 2024, and January 7, 2025, in this matter. I also testified at trial on June 16, 2025. All of my previous testimony remains true and correct to the best of my knowledge.
2. I am aware that SB 249, enacted by the General Assembly this month, changes the district lines for Congressional District 1 (CD 1) and Congressional District 3 (CD 3). I am opposed to this Bill because it splits apart communities in the Black Belt and destroys any opportunity for Black voters to elect a candidate responsive to their needs in CD 1.
3. I was unable to attend any hearings at the Capitol for SB 249 because they were announced at the last minute, and I live about two hours away from Raleigh. I am a retired public health social worker and community activist in addition to my duties as the President of the North Carolina Chapter of the NAACP.
4. The NAACP promotes the message that Black voters and other people of color should have an equal opportunity to choose a representative responsive to their communities. This message is crucial for educating, registering, and turning out voters.
5. The NAACP and our members have referenced the success of Black voters in electing responsive representatives in CD 1 as a way to motivate voter registration and voter turnout. It has long been a point of pride for communities in the Black Belt that they have elected Congresspeople they support and who are responsive to them, including Congresswoman Eva Clayton and other trailblazing Black representatives such as Congressmen Frank Ballance and G.K. Butterfield.

6. I personally know Congressman Don Davis, the current Representative for CD 1. Congressman Davis is highly visible in communities in the Black Belt and frequently attends events, including those organized by the NAACP. For example, recently, Congressman Davis attended the funeral of Fred Yates, the former President of the Perquimans County Branch of the NAACP. Congressman Davis is a minister in Snow Hill and ministers in other parts of the District, providing constituents with opportunities to convey their needs to him.
7. Beginning with Congresswoman Eva Clayton, CD 1 has, for decades, elected representatives supported by and responsive to Black communities. This is one of the reasons that the North Carolina State Conference of the NAACP has invested resources in registering, educating, and activating voters in that part of the State. For example, we have made sure there are active NAACP chapters in every county that used to comprise CD 1 to elevate voices of people living in the Black Belt. We have been able to keep those chapters active with the support of local members because there are substantial Black populations in that part of the State. We have relied on leaders and members of local NAACP chapters to engage in voter registration, education, and turnout efforts each election, which is core to the NAACP's mission.
8. I am aware that SB 249 moves several counties with large Black populations from CD 1 into CD 3, and several counties with large White populations from CD 3 into CD 1. Anyone who is familiar with North Carolina knows that the areas moved out of CD 1, such as Wayne, Wilson, and Lenoir Counties, include substantial Black populations, and that relatively few Black people live in counties on the eastern coast.
9. SB 249 added counties to CD 1 that have not historically been a part of this District and communities that have not joined the coalitional advocacy efforts of the NAACP in the Black Belt. Because of this, it will be an uphill battle to establish

voter registration, education, and advocacy efforts spanning CD 1, that the NAACP had before SB 249.

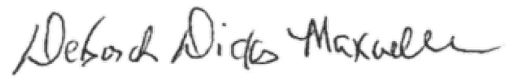
10. The NAACP does not have active branches in several counties that are now part of CD 1, including Hyde and Dare counties. SB 249 has harmed the ability of the NAACP and its members to organize and advocate in CD 1 by moving the district lines again. If SB 249 stays in place, the NAACP will try to establish active chapters in Hyde and Dare counties, which will involve some members and leaders of the North Carolina State Conference traveling to these counties. It is about a three-hour drive from the NAACP State Conference headquarters in Raleigh to Hyde and Dare counties, so it will require substantial effort and time for us to accomplish this. It is a much shorter trip from Raleigh to the counties that were taken out of CD 1 by SB 249.
11. Additionally, it will be harder to register and activate voters who believe, understandably, that the deck is stacked against them. If SB 249 stands, the NAACP can no longer credibly tell their members and other Black voters that they have a chance of electing a representative who is responsive to their communities. Instead, they will have to change how they communicate with prospective voters who are skeptical that their vote will matter and will have to spend more time educating voters as to which district they might be voting in during any given election cycle.
12. The NAACP chapter presidents in Lenoir, Greene, Wayne, and Wilson counties have been effective advocates for their communities, including by organizing members to register voters and get out the vote. They work with neighboring chapters across the Black Belt in CD 1. They have also conveyed the concerns of NAACP members and other community members to Representative Davis, who is receptive to hearing them.
13. These NAACP chapters in Lenoir, Greene, Wayne, and Wilson counties are now in CD 3. This harms the ability for chapter presidents and members in those counties

to advocate for their communities, because they have never voted in CD 3 and have not built ties with communities in other parts of the District. These chapters are now cut off from other chapters with whom they have long had ties.

14. I believe SB 249 was passed to punish Black voters in CD 1 for making their voices heard, and for suing to strike down the previous congressional map in 2023. I am aware that a lead sponsor of SB 249 used the phrase “sue until blue” to characterize voters exercising their rights to challenge unlawful maps in North Carolina. That phrase is abhorrent and inaccurate. The NAACP and its members sued against the 2023 map and SB 249 to make sure all voters, including Black voters, have a fair chance to participate in the democratic process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 10/31/2025

  
Deborah Dicks Maxwell

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**DECLARATION OF JACKSON SAILOR JONES  
DEPUTY DIRECTOR OF COMMON CAUSE NORTH CAROLINA**

I, Jackson Sailor Jones, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a resident of Alamance County, where I have lived since July of 2022. I am a native of Warren County, North Carolina, and have lived in North Carolina for 50 years.
2. Warren County is the home of Congresswoman Eva Clayton, the first Black woman to represent North Carolina in the U.S. Congress. When she was elected in 1992, Congresswoman Clayton was the first Black member of the North Carolina Congressional delegation since 1901.
3. I have worked at Common Cause North Carolina since 2022, first as Associate Director and then as Deputy Director.
4. Common Cause is a 501(c)(4) nonpartisan, nonprofit organization dedicated to upholding the core values of democracy. Common Cause is a Plaintiff in this matter, and I am authorized to speak for Common Cause in this case.
5. I am aware that earlier this month the General Assembly enacted SB 249, which changed the district lines for Congressional District 1 (CD 1) and Congressional District 3 (CD 3) for the second time in two years. I have lived or worked in the northeastern part of North Carolina that CD 1 encompasses for 50 years. A core part of my job is organizing and educating voters in CD 1. Anyone who is remotely familiar with the people and geography of this State knows that the Black Belt region, including the counties that were moved out of CD 1, includes substantial Black populations.
6. Since Congresswoman Eva Clayton was elected to CD 1 in 1992, the District has been represented by a Black member of Congress responsive to Black voters.
7. SB 249 was introduced and enacted following a trial on legal challenges to the 2023 maps. The General Assembly only allowed limited public comment for SB 249 and

allowed members of the public to speak only for one minute, whereas they usually have two minutes. Public comment was tacked on to the normal committee meetings rather than held as separate sessions. There were about 60 public comments across the in-person hearings; every member of the public who gave testimony at the hearings opposed SB 249. Many of the people SB 249 impacts, who live in CD 1 and CD 3, live over 200 miles away, making it difficult to attend a weekday hearing with short notice.

8. From my research, I know that over 12,400 public comments were submitted online, which is many times more than past redistricting bills. Fewer than 20 of those comments expressed support for SB 249.
9. Based on my work in CD 1, I know that Congressman Davis is responsive to constituents. Not everyone agrees with him on all issues, but people go to him in droves to advocate for their communities' needs, and he seeks to learn about and be responsive to them. Congressman Davis used to serve in the State Senate and represented Lenoir County, so constituents there have even deeper connections to him.
10. SB 249 directly harms Common Cause's work in the Black Belt region of the State. A core part of our work is educating voters on how to exercise their right to vote and building networks to inform and empower voters. The northeast part of the state is a media desert, especially when it comes to voter education and changes to voting laws.
11. This succession of redrawn districts in the Black Belt makes it difficult to present a consistent message to prospective voters about the candidates they can choose from and who they are represented by in Congress. SB 249 hampers an already resource-starved voter advocacy and education structure in the part of the State that CD 1 encompasses. When voters aren't familiar with who is on their ballot because the district lines continue to change, it is difficult for us to educate and motivate voters.

12. I have worked directly with community leaders in the Black Belt who used to be in CD 1 and are now in CD 3. SB 249 directly harms the coalitional organizing work we do together, because it breaks apart longstanding communities of interest and thereby increases the burdens on advocates to educate and empower voters. Leaders and organizers have spent years working together to advocate for their communities in CD 1, and many are now severed from those networks after being moved into CD 3. As a result, voters in these new districts will face additional challenges both in overcoming barriers to voting access and making informed choices at the polls.
13. A poll conducted by Opinion Diagnostics commissioned by Common Cause North Carolina in 2025 found that North Carolinians overwhelmingly believe voting districts should provide fair representation for all communities and viewpoints. This, and my longstanding advocacy experience, lead me to believe that since voters have been told CD 1 was changed so that the result of any election is essentially preordained, it will be significantly harder for Common Cause to successfully encourage people to register and vote in CD 1.
14. I am aware that a lead proponent of SB 249 described lawsuits challenging unlawful district maps as a “sue until blue” strategy. The Executive Director of Common Cause North Carolina, Bob Phillips, was called the “President of the sue until blue club” when Common Cause challenged redistricting previously. It is clear that SB 249 was passed to bring the hammer down on voters, communities, and organizations that advocated against past districting maps, including plaintiffs for challenging the 2023 maps.
15. SB 249 is an unprecedented, targeted attempt to retaliate against voters for advocacy in public and in the courts. As an organization, SB 249 chills our work. We will have to consider whether our members will be punished by targeted line drawing if we choose to advocate for maps that are lawful. It is antithetical to Common Cause’s mission to be involved in litigation that could prompt the General Assembly to target marginalized communities through redistricting.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: October 31, 2025\_\_

A handwritten signature in black ink, appearing to read "J. Jones", written above a horizontal line.

Jackson Sailor Jones