

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAN MCCONCHIE, in his official capacity as Minority Leader of the Illinois Senate and individually as a registered voter, JIM DURKIN, in his official capacity as Minority Leader of the Illinois House of Representatives and individually as a registered voter, JAMES RIVERA, ANNA DE LA TORRE, DOLORES DIAZ, FELIPE LUNA JR., SALVADOR TREMILLO, CHRISTOPHER ROMERO, the REPUBLICAN CAUCUS OF THE ILLINOIS SENATE, the REPUBLICAN CAUCUS OF THE ILLINOIS HOUSE OF REPRESENTATIVES, and the ILLINOIS REPUBLICAN PARTY,

Plaintiffs,

vs.

IAN K. LINNABARY, CASANDRA B. WATSON, WILLIAM J. CADIGAN, LAURA K. DONAHUE, CATHERINE S. MCCRORY, WILLIAM M. MCGUFFAGE, and RICK S. TERVEN, SR., in their official capacities as members of the Illinois State Board of Elections, EMANUEL CHRISTOPHER WELCH, in his official capacity as Speaker of the Illinois House of Representatives, the OFFICE OF SPEAKER OF THE ILLINOIS HOUSE OF REPRESENTATIVES, DON HARMON, in his official capacity as President of the Illinois Senate, and the OFFICE OF THE PRESIDENT OF THE ILLINOIS SENATE,

Defendants.

Case No. 1:21-cv-03091

Circuit Judge Michael B. Brennan
Chief District Judge Jon E. DeGuilio
District Judge Robert M. Dow, Jr.

Three-Judge Court
Pursuant to 28 U.S.C. § 2284(a)

PLAINTIFFS' NOTICE OF FILING OF HEARING DEMONSTRATIVES

Pursuant to the Court's instructions, Plaintiffs in the above-captioned matter submit this notice of filing of the presentation prepared by Plaintiffs for the hearing held on December 7, 2021.

A copy of the presentation is attached as Exhibit A hereto.

Dated: December 8, 2021

/s/ Phillip A. Luetkehans

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Respectfully submitted,

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EXHIBIT A

Plaintiffs' Argument in Support of Remedial Map

McConchie, et al. v. Linnabary, et al.

No. 1 :21-cv-03091



LUETKEHANS, BRADY,
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MAYER | BROWN

Section 2 of the Voting Rights Act (52 U.S.C. § 10301)

- (a) No voting qualification or prerequisite to voting or standard, practice, or procedure shall be imposed or applied by any State or political subdivision in a manner which **results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color,** or in contravention of the guarantees set forth in section 10303(f)(2) of this title, as provided in subsection (b).
- (b) A violation of subsection (a) is established if, based on the totality of circumstances, it is shown that the political processes leading to nomination or election in the State or political subdivision are not equally open to participation by members of a class of citizens protected by subsection (a) in that its members have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice. The extent to which members of a protected class have been elected to office in the State or political subdivision is one circumstance which may be considered: Provided, That nothing in this section establishes a right to have members of a protected class elected in numbers equal to their proportion in the population.

Current Latino Legislators Within Challenged Areas

Latino legislators often are appointed to their positions, allowing them to run as incumbents, rather than first winning in competitive elections.

Representative	Current District (2021-22)	Initial Appointment or Election
Jamie Andrade	HD 40	Appointed (2013)
Eva Dina Delgado	HD 3	Appointed (2019)
Edgar Gonzalez, Jr.	HD 21	Appointed (2020)
Angelica Guerrero-Cuellar	HD 22	Appointed (2021)
Barbara Hernandez	HD 83	Appointed (2019)
Elizabeth Hernandez	HD 24	Elected (2006)
Aaron Ortiz	HD 1	Elected (2018)
Delia C. Ramirez	HD 4	Appointed after having won primary (2018)
Senator	Current District (2021-22)	Initial Appointment or Election
Omar Aquino	SD 2	Appointed after having won primary (2016)
Antonio Munoz	SD 1	Elected (1998)
Cristina Pacione-Zayas	SD 20	Appointed (2020)
Karina Villa	SD 25	Elected (2020)
Celina Villanueva	SD 11	Appointed (2020)

Other Latino members of the General Assembly who reside outside of the challenged areas (Rep. Avelar, Rep. Crespo, and Sen. Castro) are not included here.

Sources: Report of Dr. Jacob M. Grumbach (Nov, 7, 2021) at Table 2, 1:21-cv-03139, Dkt. 135-19; biographies available at <https://www.ilga.gov/house/default.asp> and <https://www.ilga.gov/senate/default.asp>.

Power of Appointment / Incumbent Dominance, 2014-2020

Anthony Fowler
Expert Report

Table 2. Incumbent Dominance in Illinois General Assembly Elections, 2014-2020

	House	Senate	combined
won reelection	367	84	451
lost in primary	6	0	6
lost in general	13	3	16
resigned, appointed incumbent won	42	21	63
resigned, appointed incumbent lost in primary	1	0	1
resigned, appointed incumbent lost in general	4	1	5
retired, open seat race	39	11	50
total	472	120	592
Pr(winner reelected seeking reelection)	.951	.966	.953
Pr(appointed incumbent elected appointment)	.894	.955	.913
Pr(elected or appointed incumbent wins seeking election)	.945	.963	.948
Pr(incumbent running)	.917	.908	.916

— Ex. C at 12

Power of Appointment / Incumbent Dominance, 2014-2020

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Pr(incumbent running)	.917	.908	.916

— Ex. C at 12

Organizations Publicly Opposing Redistricting Process

- **United Congress of Community and Religious Organizations (UCCRO):**
 - Coalition for a Better Chinese American Community
 - Communities United, Enlace Chicago
 - HANA Center, Illinois Muslim Civic Coalition
 - Inner City Muslim Action Network
 - Kenwood-Oakland Community Organization
 - Latino Policy Forum
 - Lugenia Burns Hope Center
 - Target Area Development Corporation
- **CHANGE Illinois**
- **Common Cause Illinois**
- **Mexican American Legal Defense Fund (MALDEF)**
- **East St. Louis Branch, NAACP**
- **Illinois African Americans for Equitable Redistricting & Nonprofit Utopia**

Latino Policy Forum Press Release

districts were added in the maps passed by the general assembly. In fact, preliminary analysis and reports show that some Latino-majority districts are diluted even more, further hindering the community's ability to elect the representatives of their choice.

The Forum supports and stands alongside efforts led by the United Congress of Community and Religious Organizations (UCCRO), the IL Muslim Civic Coalition, the Chicago Lawyers' Committee for Civil Rights, and other allies that denounce the passed maps.

FOR IMMEDIATE RELEASE: September 2, 2021

Steven Arroyo, Communications Manager
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The Latino Policy Forum Urges Governor Pritzker to Veto Inequitable Legislative Maps

CHICAGO -- The Latino Policy Forum urges Governor Pritzker to veto the Illinois legislative maps passed by legislators this week, which do not equitably reflect the state's Latino community.

Despite recent 2020 census data indicating that Illinois added 309,832 Latinos (the largest population increase among racial/ethnic groups statewide), no Latino-majority districts were added in the maps passed by the general assembly. In fact, preliminary analysis and reports show that some Latino-majority districts are diluted even more, further hindering the community's ability to elect the representatives of their choice.

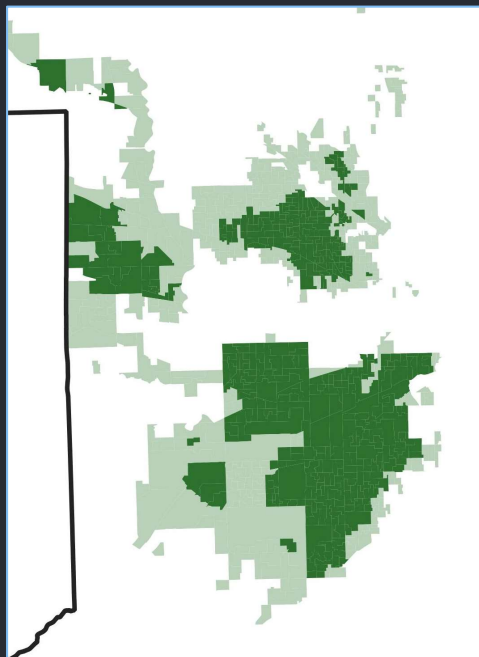
Furthermore, as with the maps from the spring, the Illinois legislature did not provide advocates with a reasonable timeline that would enable community input.

The Forum supports and stands alongside efforts led by the United Congress of Community and Religious Organizations (UCCRO), the IL Muslim Civic Coalition, the Chicago Lawyers' Committee for Civil Rights, and other allies that denounce the passed maps.

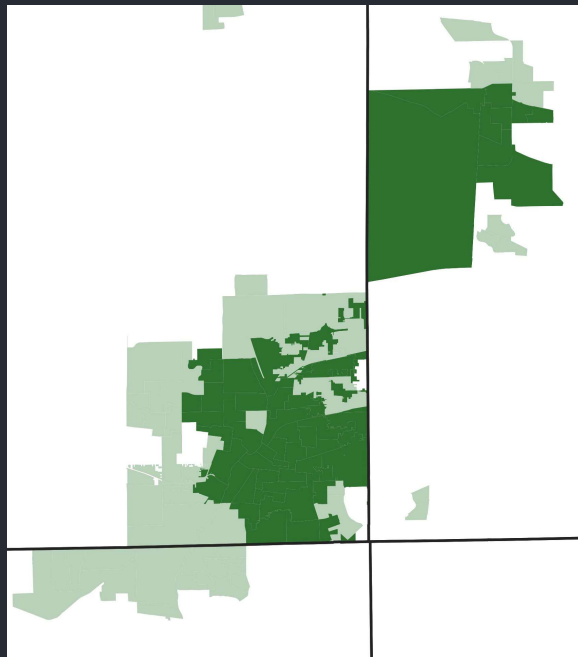
Read the Forum's recent statements on why Illinois Latinos were shortchanged by the redistricting maps signed into law in the spring:
<https://www.latinopolicyforum.org/news/press-releases>

Compactness of Minority Communities In Challenged Areas

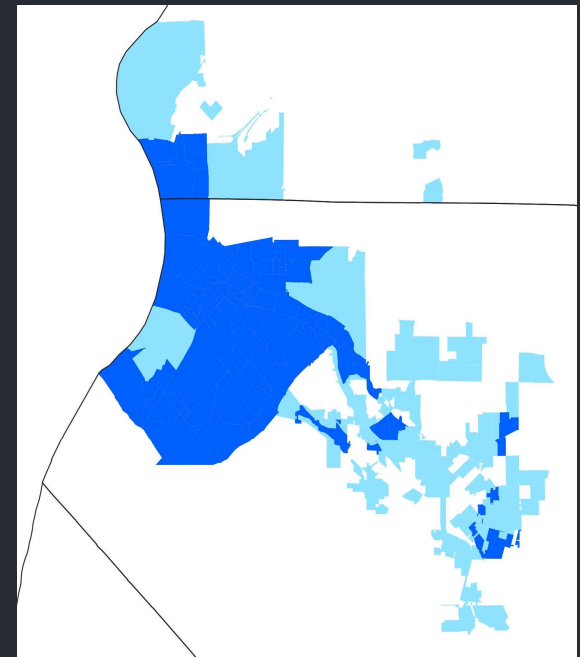
Cook County Latino Population



Aurora Latino Population



Metro East Black Population



Source: Report of Dr. Jowei Chen (Nov. 10, 2021), 1:21-cv-03091, Dkt. 151-2; Figures 7, 10, 13

Frequency of Contested Elections (2012-2020)

Electoral Competition in the Illinois House of Representatives				
Assembly	Primary Uncontested	General Uncontested	Both Uncontested	Appointment
98	.720	.500	.356	.085
99	.805	.559	.475	.093
100	.831	.568	.475	.127
101		.424		.119
102	.797	.398	.280	.017
Pooled	.788	.490	.396	.088

Source: Report of Dr. Anthony Fowler (Nov. 10, 2021), 1:21-cv-03091, Dkt. 151-3.

Frequency of Contested Elections in Challenged Areas (2012-2020)

Incumbents in the challenged areas, most of whom were initially appointed to their positions, are rarely challenged. On average, in the challenged areas of northeastern Illinois (Cook County and Aurora), where the Democratic primary election is the election of consequence, voters have a choice among candidates at only 31% of primary elections (25 out of 81 possible elections).

District	Current Incumbent	2012 Primary	2014 Primary	2016 Primary	2018 Primary	2020 Primary
HD 1	Aaron Ortiz (elected 2018)	N	N	N	Y	Y
HD 2	Theresa Mah (elected 2016)	Y	N	Y	N	Y
HD 3	Eva Dina Delgado (appointed 2019)	N	N	N	N	Y
HD 4	Delia C. Ramirez (appointed 2018)	N	N	Y	Y	N
HD 21	Edgar Gonzalez Jr. (appointed 2020)	Y	N	N	N	N
HD 22	Angelica Guerrero-Cuellar (appointed 2021)	Y	N	Y	N	N
HD 23	Michael Zalewski (appointed 2008)	N	N	N	N	N
HD 24	Elizabeth Hernandez (elected 2006)	Y	N	N	Y	N
HD 39	Will Guzzardi (elected 2014)	Y	Y	N	N	N
HD 40	Jamie Andrade (appointed 2013)	N	Y	Y	N	Y
HD 77	Kathleen Willis (elected 2012)	N	Y	N	N	N
HD 83	Barbara Hernandez (appointed 2019)	N	N	N	N	Y
HD 114	LaToya Greenwood (elected 2016)	N	N	N	N	N
SD 1	Antonio Munoz (elected 1998)	Y	--	N	--	Y
SD 2	Omar Aquino (appointed 2016)	N	--	Y	N	--
SD 11	Celina Villanueva (appointed 2020)	N	--	N	N	N
SD 12	Steven Landek (appointed 2011)	Y	N	--	N	--
SD 20	Cristina Pacione-Zayas (appointed 2020)	N	--	N	Y	--

Source: Report of Dr. Anthony Fowler (Nov. 10, 2021), 1:21-cv-03091, Dkt. 151-3; Incumbent biographies available at <https://www.ilga.gov/house/default.asp> and <https://www.ilga.gov/senate/default.asp>; ballotpedia.org.

Frequency of Contested Elections in Challenged Areas (2012-2020)

Not all of those 25 contested elections are competitive. As Dr. Fowler showed, many challengers do not invest resources needed to meaningfully engage voters. Examples of the contested, but uncompetitive, elections include:

District	Election	Incumbent	Incumbent Expenditures	Challenger	Challenger Expenditures
HD 77	2014 Primary	Kathleen Willis	\$ 32,289	Antonio Favela	\$ 5,413
HD 4	2016 Primary	Cynthia Soto	\$ 76,532	Robert Zwolinski	\$ 4,408
HD 40	2020 Primary	Jaime Andrade	\$ 330,988	Syamala Krishnamsetty	\$ 4,925
SD 12	2012 Primary	Steven Landek	\$ 88,816	Raul Montes	\$ 0

In many other cases, elections are between multiple Latino incumbents. Of the 25 contested elections, **11 elections included multiple Latino candidates**, reducing their probative value.

District	Election	District	Election
HD 1	2020 Primary	HD 24	2012 Primary
HD 3	2020 Primary	HD 24	2018 Primary
HD 4	2018 Primary	HD 83	2020 Primary
HD 21	2012 Primary	SD 1	2020 Primary
HD 22	2016 Primary		

Source: Report of Dr. Anthony Fowler (Nov. 10, 2021) at Table 3, 1:21-cv-03091, Dkt. 151-3.

Criteria for Identifying Election Outcomes for Latino-Preferred Candidates In Cook County Contests

1. The election was a primary election or a non-partisan municipal election.
2. For endogenous (State House or Senate) elections, the district is substantially within the region covered by the Plaintiffs' Remedial Plan.
3. Over 50% of Latino voters favored a single candidate.
4. Over 50% of white voters favored a candidate other than the Latino-preferred candidate.

Source: Report of Dr. Jowei Chen (Nov. 10, 2021), 1:21-cv-03091, Dkt. 151-2; p. 33

Election Outcomes for Latino-Preferred Candidates In Cook County Contests

Jowei Chen
Expert Report

**Table 8: Election Outcomes for Latino-Preferred Candidate in Races in Cook County
Satisfying the Paragraph 32 Criteria:**

Election Contest in Cook County Satisfying the Paragraph 32 criteria:	Latino-preferred candidate	Election outcome for Latino- preferred candidate:
2015 Chicago Mayoral election	“Chuy” Garcia	Defeated
2018 Cook County Assessor Primary	Joe Berrios	Defeated
2012 HD-39 Primary	Toni Berrios	Won
2014 HD-39 Primary	Toni Berrios	Defeated
2018 HD-1 Primary	Aaron Ortiz	Won

– Ex. B at 41

Dr. Allan Lichtman's Conflicting Opinions

2011

"Latino candidates of choice almost invariably prevailed in endogenous elections and elections paring Latino and non Latino candidates; therefore; **Plaintiffs cannot meet Gingles prong 3."**

— 10/4/11 Expert Report of Lichtman
in Committee for a Fair & Balanced Map v. Il. St. Bd of Elections

2021

Q: So are you testifying here that, in your opinion, the **plaintiffs have not satisfied the third prong of Gingles?**

A: **The third prong?**

Q: **Yes.**

A: **Yes.**

— 12/5/2021 Lichtman Dep. Trans. 292:10-15

1996

"Dr. Lichtman concludes that 'Hispanics in the City of Chicago would have a reasonable opportunity to elect a candidate of their choice . . . **only in a district with a voting-age majority of Hispanics.**'"

— King v. State Bd. of Elections, 979 F. Supp. 582, 613-14 (N.D. Ill. 1996),
vacated and remanded by 519 U.S. 978

1997

"Through the testimony of Professor Lichtman, the *Bonilla* plaintiffs successfully established that Latino voters consistently prefer Latino candidates and that, where conditions permit, white voters vote as a block **sufficiently to defeat usually the Latino preferred candidate.**"

— Barnett v. City of Chicago, 969 F. Supp. 1359, 1444 (N.D. Ill. 1997),
affirmed in part and vacated in part by 141 F.3d 699 (7th Cir.)

2001

Q: Dr. Lichtman, before we took a break, I asked you about whether the three *Gingles* conditions exist in Cook County for African Americans. **Would your answer be the same as to Hispanics?**

A: **Yes**

— 1/5/2002 Dep. Trans. at 99:8-14 in Campuzano v. Il. St. Bd of Elections

Dr. Allan Lichtman's Conflicting Opinions

2021

"As I explain in the next section on *Gingles* Prong 3 – whether voting by **white majority** usually defeats minority preferred candidates..."

– Lichtman Expert Report, Dkt. 160-1 at 11

2011

"As correctly noted by Dr. Lichtman, proof of vote dilution requires two steps. The Committee must first show that Latinos and non-Latinos prefer different candidates, and second, that the **non-Latino voting bloc** is sufficiently strong to usually defeat the Latino candidate of choice."

– Committee for a Fair & Balanced Map v. Il. St. Bd. of Elections, 835 F. Supp. 2d 563, 589 (N.D. Ill. 2011)



Dr. Lichtman's Version of *Gingles* 3 Matters

According to Dr. Lichtman, the “better election to use” for Dr. Chen’s performance analysis “is the 2015 Chicago mayoral runoff election between Hispanic candidate Jesus ‘Chuy’ Garcia and white candidate Rahm Emanuel.”

— Lichtman Expert Report at. 172

“Winning candidate Emanuel was not only backed by white voters, but by 59.5% of non-Hispanic minorities in Chicago....”

— Lichtman Expert Report at. 84

“The white majority did not defeat the Hispanic candidate of choice in that race, **rather the candidate was defeated by a coalition of white and non-Latino minorities**”

— Dkt. 160 at p. 31.

Dr. Lichtman Opines on the Ultimate Legal Question

Dr. Lichtman
Deposition
12/5/21

Q: So you are testifying here that, in your opinion, the plaintiffs have not satisfied the third prong of *Gingles*?

A: The third prong?

Q: Yes.

A: Yes.

— Depo trans. at 292:10-15

Dr. Lichtman Opines on the Ultimate Legal Question

Although Courts have credited Dr. Lichtman's testimony over the years, they also have not hesitated to preclude testimony by Dr. Lichtman that has similarly overreached:

"Dr. Lichtman's opinion on the legislature's discriminatory intent ***improperly invades the province of the trier of fact by opining on the ultimate legal question*** in this case.... As such, Defenants' ***Daubert motion is granted in part***. Dr. Lichtman will be precluded from offering any opinions at trial as to the ultimate issue of discriminatory legislative intent."

— *City of South Miami v. DeSantis*, 2020 WL 7074644, at *13-14 (S.D. Fla. Dec. 3, 2020)

"The Court also has ***not considered Dr. Lichtman's opinions on the ultimate issue of legislative intent***, both because this issue is ***not the proper subject of expert testimony and because it invades the province of the Court***."

— *Democratic Nat'l Comm. v. Reagan*, 329 F. Supp. 3d 824, 834 (D. Ariz. 2018)
ultimately affirmed by *Brnovich v. DNC*, 141 S. Ct. 2321 (2021)

Dr. Lichtman Neglects Incumbency

“Furthermore, the success of a minority candidate in a particular election does not necessarily prove that the district did not experience polarized voting in that election; ***special circumstances***, such as the absence of an opponent, ***incumbency***, or the utilization of bullet voting, may explain minority electoral success in a polarized contest.”

– *Gingles*, 478 U.S. 30, 57 (1986) (emphasis added).

Dr. Lichtman mentions “special circumstances” just once in his 205 report (p. 33), and only “running unopposed” and ***not*** incumbency

Dr. Lichtman's History of Neglecting Incumbency

"In its dispositive memorandum opinion, the court found....**Dr. Lichtman's analysis was flawed** because he only analyzed elections (both judicial and nonjudicial) involving a black candidate; moreover, he failed to appropriately consider the effect on judicial election results of the **power of incumbency** and, with respect to incumbents who had been appointed to office, the prestige of merit selection."

— *Southern Leadership Conf. of Ala. v. Sessions*, 56 F.3d 1281, 1293 (11th Cir. 1995) (en banc).

"[P]laintiffs who challenge the redistricting plan have an obligation to prove their case...The failure to satisfy this obligation is amply demonstrated by the testimony of plaintiffs' own expert witness [Dr. Lichtman], who testified that he **neglected to consider certain basic factors that are highly relevant** in any redistricting plan, **including the factor of political incumbency**. "

— *Wilkins v. West*, 571 S.Ed. 2d 100, 121 (Va. 2002) (Hassell, J., concurring) (emphasis added)

Comparison of Minority Districts by Plan: Northern Cook County

No northern Cook County districts in the September Plan have at least 65% Latino total population or 50% Latino CVAP. By contrast, Plaintiffs' remedial plan offers four districts with at least 50% Latino CVAP.

September Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)
3	58.0%	47.7%
4	56.1%	45.3%
39	55.3%	45.7% (White incumbent)
77	57.9%	43.6% (White incumbent)

Plaintiffs' Remedial Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)	
3	63.8%	50.8%	✓
4	62.5%	51.6%	✓
39	58.6%	50.3%	✓
77	63.3%	51.4%	✓

Source: Report of Dr. Jowei Chen (Nov. 10, 2021) at Tables 1 and 2, 1:21-cv-03091, Dkt. 151-2.

Comparison of Minority Districts by Plan: Southern Cook County

Four southern Cook County districts in the September Plan have at least 65% Latino total population or 50% Latino CVAP, two of which are packed. The other two "Latino influence" districts have non-Latino incumbents. By contrast, Plaintiffs' remedial plan offers seven districts with at least 50% Latino CVAP.

September Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)
1	79.1% Packed ✓	64.8% Packed ✓
2	68.3% ✓	55.3% ✓
21	55.6%	42.7% (White incumbent)
22	67.1% ✓	52.7% ✓
23	86.6% Packed ✓	71.1% Packed ✓
24	51.4%	43.8% (Asian incumbent)

Source: Report of Dr. Jowei Chen (Nov. 10, 2021) at Tables 1 and 2, 1:21-cv-03091, Dkt. 151-2.

Plaintiffs' Remedial Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)
1	65.5% ✓	51.0% ✓
2	65.5% ✓	50.9% ✓
21	62.9%	50.6% ✓
22	64.6%	51.4% ✓
23	69.6% ✓	51.5% ✓
24	61.0%	51.0% ✓
32	68.0% ✓	51.1% ✓

Comparison of Minority Districts by Plan: Aurora

No Aurora-area districts in the September Plan have at least 65% Latino total population or 50% Latino CVAP. By contrast, Plaintiffs' remedial plan offers a district with at least 65% Latino total population.

September Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)
49	27%	16.4%
50	53.2%	36.8%
83	23.5%	14.3%
84	20.7%	15.4%

Plaintiffs' Remedial Plan

House District	Latino Population (At least 65%)	Latino CVAP (At least 50%)
50	66.5% ✓	46.8%

Source: Report of Dr. Jowei Chen (Nov. 10, 2021) at Tables 1 and 2, 1:21-cv-03091, Dkt. 151-2.

Comparison of Minority Districts by Plan: Metro East

No Metro East districts in the September Plan have at least 50% Black CVAP. By contrast, Plaintiffs' remedial plan offers a district with at least 50% Black CVAP.

September Plan

House District	Black Population	Black CVAP (At least 50%)
112	16.8%	13.6% (white incumbent)
113	34.0%	25.4% (white incumbent)
114	36.5%	38%

Plaintiffs' Remedial Plan

House District	Black Population	Black CVAP (At least 50%)
114	55.1%	51.3% ✓

Source: Report of Dr. Jowei Chen (Nov. 10, 2021) at Tables 1 and 2, 1:21-cv-03091, Dkt. 151-2.

Appendix

Fowler

Table 1

Table 4

Figure 1

Table 2

Table 5

Figure 2

Table 3

Table 6

Table 1. Racially Polarized Voting in Illinois

Anthony Fowler
Expert Report

Table 1. Racially Polarized Voting in Illinois

Election	White	Black	Latino	Asian	Black – White	Hisp – White	Asian – White
Governor 2006	.488 (.021)	.902 (.028)	.714 (.062)	.791 (.140)	.413 (.035)	.226 (.066)	.302 (.142)
Governor 2010	.417 (.021)	.957 (.017)	.581 (.106)	.262 (.136)	.540 (.027)	.165 (.108)	-.154 (.137)
Governor 2014	.392 (.020)	.889 (.027)	.658 (.094)	.342 (.136)	.497 (.033)	.266 (.096)	-.050 (.138)
Governor 2018	.486 (.017)	.967 (.016)	.801 (.052)	.642 (.098)	.481 (.023)	.315 (.054)	.156 (.099)
U.S. President 2008	.518 (.022)	.977 (.016)	.835 (.066)	.707 (.126)	.460 (.027)	.317 (.070)	.189 (.128)
U.S. President 2012	.502 (.021)	.975 (.018)	.794 (.061)	.658 (.152)	.473 (.028)	.292 (.065)	.155 (.154)
U.S. President 2016	.502 (.017)	.931 (.032)	.896 (.027)	.787 (.064)	.429 (.036)	.395 (.032)	.285 (.066)
U.S. President 2020	.516 (.017)	.939 (.028)	.743 (.061)	.727 (.099)	.423 (.032)	.227 (.063)	.211 (.101)
U.S. Senate 2008	.559 (.021)	.977 (.017)	.823 (.072)	.670 (.142)	.418 (.027)	.264 (.075)	.111 (.144)
U.S. Senate 2010	.390 (.020)	.957 (.016)	.491 (.102)	.268 (.141)	.567 (.026)	.100 (.104)	-.122 (.142)
U.S. Senate 2014	.476 (.021)	.962 (.017)	.785 (.070)	.505 (.142)	.486 (.027)	.309 (.073)	.028 (.144)
U.S. Senate 2016	.540 (.017)	.985 (.006)	.767 (.074)	.594 (.091)	.445 (.018)	.227 (.076)	.054 (.093)
U.S. Senate 2020	.521 (.016)	.979 (.011)	.739 (.063)	.707 (.102)	.458 (.020)	.218 (.065)	.186 (.104)

The table reports the share of Illinois voters from each racial group who supported the Democratic candidate in each election. The final three columns show the difference between minority and white voters. Standard errors are in parentheses.

– Ex. C at 11

Table 2. Racially Polarized Voting in Different Regions of Interest

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Table 2. Racially Polarized Voting in Different Regions of Interest

	DV = Democratic Vote			
	Illinois	Chicago	Aurora	Metro East
Black	.473 (.008)	.285 (.016)	.589 (.048)	.532 (.036)
Latino	.254 (.022)	.161 (.029)	.432 (.118)	.342 (.077)
Asian	.131 (.034)	.048 (.054)	.217 (.115)	-.451 (.058)
Election Fixed Effects	X	X	X	X
Survey Weights	X	X	X	X
Observations	17,618	3,948	439	830
Mean DV for white voters	.480	.674	.376	.445

Heteroskedasticity-robust standard errors are in parentheses.

— Ex. C at 12

Table 3. Competition In Elections of Interest

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Election	Name	Winner		Name	Runner-up		Winner Vote Share	Winner Spending Share
		Votes	Spending		Votes	Spending		
H4 2018 P	DELIA RAMIREZ	7,120	\$0.00	IRIS MILLAN	3,076	\$144,746.60	.698	.000
CMP 2016 G	SUSANA MENDOZA	2,676,244	\$3,533,134.00	LESLIE MUNGER (I)	2,404,723	\$9,977,165.00	.527	.262
H114 2016 G	LATOYA GREENWOOD	26,029	\$47,655.28	BOB ROMANIK	19,492	\$120,386.62	.572	.284
H1 2018 P	AARON ORTIZ	5,636	\$127,045.70	DAN BURKE (I)	4,974	\$221,122.80	.531	.365
H10 2020 P	OMAR WILLIAMS (I)	8,334	\$69,896.49	GERARD C. MOORER	5,872	\$94,106.12	.587	.426
H39 2014 P	WILL GUZZARDI	5,316	\$273,165.70	TONI BERRIOS (I)	3,484	\$352,523.30	.604	.437
H25 2018 P	CURTIS TARVER	4,737	\$117,600.30	FLYNN RUSH	3,071	\$125,780.50	.607	.483
S22 2016 P	CRISTINA CASTRO	13,887	\$122,683.10	STEVE CARAMELLI	6,906	\$126,802.90	.668	.492
CCA 2018 P	FRITZ KAEGI	327,769	\$2,274,312.00	JOSEPH BERRIOS (I)	243,425	\$2,200,793.00	.574	.508
H40 2014 P	JAIME M. ANDRADE, JR. (I)	2,917	\$171,344.70	NANCY SCHIAVONE	1,585	\$161,535.10	.648	.515
AUR 2017 G	RICHARD IRVIN	7,574	\$211,384.43	RICK GUZMAN	7,404	\$198,718.72	.506	.515
H83 2020 P	BARBARA HERNANDEZ (I)	5,340	\$114,371.90	JUAN THOMAS	2,053	\$83,062.96	.722	.579
S5 2016 P	PATRICIA VAN PELT (I)	33,123	\$329,459.80	BOB FIORETTI	15,696	\$229,090.20	.678	.590
H2 2016 P	THERESA MAH	10,732	\$175,462.70	ALEX ACEVEDO	10,217	\$117,515.10	.512	.599
AG 2018 P	KWAME RAOLU	390,472	\$2,923,824.00	PAT QUINN	352,425	\$1,779,583.00	.526	.622
H40 2016 P	JAIME M. ANDRADE, JR. (I)	12,886	\$225,219.00	HARISH I. PATEL	8,812	\$120,419.00	.594	.652
H5 2016 P	JULIANA STRATTON	19,790	\$1,982,591.00	KEN DUNKIN (I)	9,300	\$965,530.80	.680	.672
S20 2018 P	IRIS MARTINEZ (I)	19,414	\$198,487.20	BART GOLDBERG	7,050	\$90,182.42	.734	.688
H39 2012 P	TONI BERRIOS (I)	4,021	\$240,160.10	WILL GUZZARDI	3,896	\$98,015.51	.508	.710
H5 2018 P	LAMONT ROBINSON	7,230	\$842,266.68	DILARA SAYEED	4,844	\$234,593.40	.599	.782
H49 2018 G	KARINA VILLA	22,133	\$1,215,408.00	TONIA JANE KHOURI	18,997	\$279,198.80	.538	.813
H22 2016 P	MICHAEL MADIGAN (I)	17,155	\$1,434,018.83	JASON GONZALES	7,124	\$253,638.99	.707	.850
H77 2014 P	KATHLEEN WILLIS (I)	3,272	\$32,288.57	ANTONIO FAVELA	946	\$5,412.50	.776	.856
S22 2016 G	CRISTINA CASTRO	39,835	\$211,483.10	TRACY SMODILLA	21,991	\$32,767.66	.644	.866
S11 2020 G	CELINA VILLANUEVA (I)	46,700	\$56,540.52	MARI BROWN	11,916	\$7,959.00	.797	.877
S25 2020 G	KARINA VILLA	60,238	\$1,565,337.00	JEANETTE WARD	57,976	\$216,875.70	.510	.878
H114 2020 G	LATOYA GREENWOOD (I)	26,682	\$94,598.21	DAVE BARNES	20,015	\$12,394.71	.571	.884
S22 2020 P	CRISTINA CASTRO (I)	13,838	\$502,285.90	RAE YAWER	3,136	\$52,326.46	.815	.906
H83 2020 G	BARBARA HERNANDEZ (I)	19,300	\$54,375.90	DONALD R WALTER	7,607	\$5,173.95	.717	.913
S40 2020 P	PATRICK J. JOYCE (I)	11,387	\$459,661.00	LORI WILCOX	6,474	\$29,275.94	.638	.940
H4 2016 P	CYNTHIA SOTO (I)	18,326	\$76,531.93	ROBERT ZWOLINSKI	4,705	\$4,408.11	.796	.946
H24 2016 G	LISA HERNANDEZ (I)	23,079	\$79,957.85	ANDY KIRCHOFF	5,969	\$4,152.09	.795	.951
S40 2020 G	PATRICK J. JOYCE (I)	57,901	\$224,180.80	ERIC M. WALLACE	41,128	\$5,610.97	.585	.976
H40 2020 P	JAIME M. ANDRADE, JR. (I)	11,687	\$330,987.50	SYAMALA KRISHNAMSETTY	6,287	\$4,925.41	.650	.985
S57 2018 G	CHRISTOPHER BELT	44,254	\$175,193.63	TANYA HILDENBRAND	30,496	\$2,213.57	.592	.988
S6 2014 G	JOHN J. GULLERTON (I)	39,851	\$1,621,943.00	STEFANIE LINARES	20,291	\$18,640.63	.663	.989
CCC2 2018 P	DENNIS DEER (I)	11,522	\$106,897.60	EDDIE JOHNSON	7,482	\$0.00	.606	1.000
S12 2012 P	STEVEN LANDEK (I)	7,121	\$88,816.19	RAUL MONTES, JR.	3,583	\$0.00	.665	1.000
H35 2012 G	FRAN HURLEY	34,590	\$51,189.32	RICARDO FERNANDEZ	16,022	\$0.00	.683	1.000
H40 2012 G	DEBORAH MELL (I)	21,744	\$3,187.36	TONI PUCCIO-JOHNSON	4,909	\$0.00	.816	1.000
H10 2016 G	MELISSA CONYEARS	35,858	\$7,228.97	MARK SPOGNARDI	6,911	\$0.00	.838	1.000

The top two performing candidates from each race are shown. Elections are sorted by the winner's spending share. Some races are general elections (G) and others are Democratic primaries (P). State legislative races indicate the chamber (H or S) and the district number. AG stands for Attorney General, CMP stands for Comptroller, CCA stands for Cook County Assessor, CCC2 stands for Cook County Commissioner District 2, and AUR stands for Aurora mayor. (I) indicates an incumbent at time of election.

— Ex. C at 12

Table 4. Electoral Competition in the IL House of Representatives

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Table 4. Electoral Competition in the Illinois House of Representatives

Assembly	Primary Uncontested	General Uncontested	Both Uncontested	Appointment
98	.720	.500	.356	.085
99	.805	.559	.475	.093
100	.831	.568	.475	.127
101		.424		.119
102	.797	.398	.280	.017
Pooled	.788	.490	.396	.088

— Ex. C at 14

Table 5. Electoral Competition in Different Settings

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Expert Report

Table 5. Electoral Competition in Different Settings

	Primary Unc.	General Unc.	Both Unc.	Appointment
Black Districts	.694	.800	.528	.111
Latino Districts	.661	.729	.446	.114
Democrats in Non-Minority Districts	.877	.337	.318	.061
Republicans	.789	.427	.395	.094

— Ex. C at 15

Table 6. Assessing Competitiveness While Controlling For Partisanship

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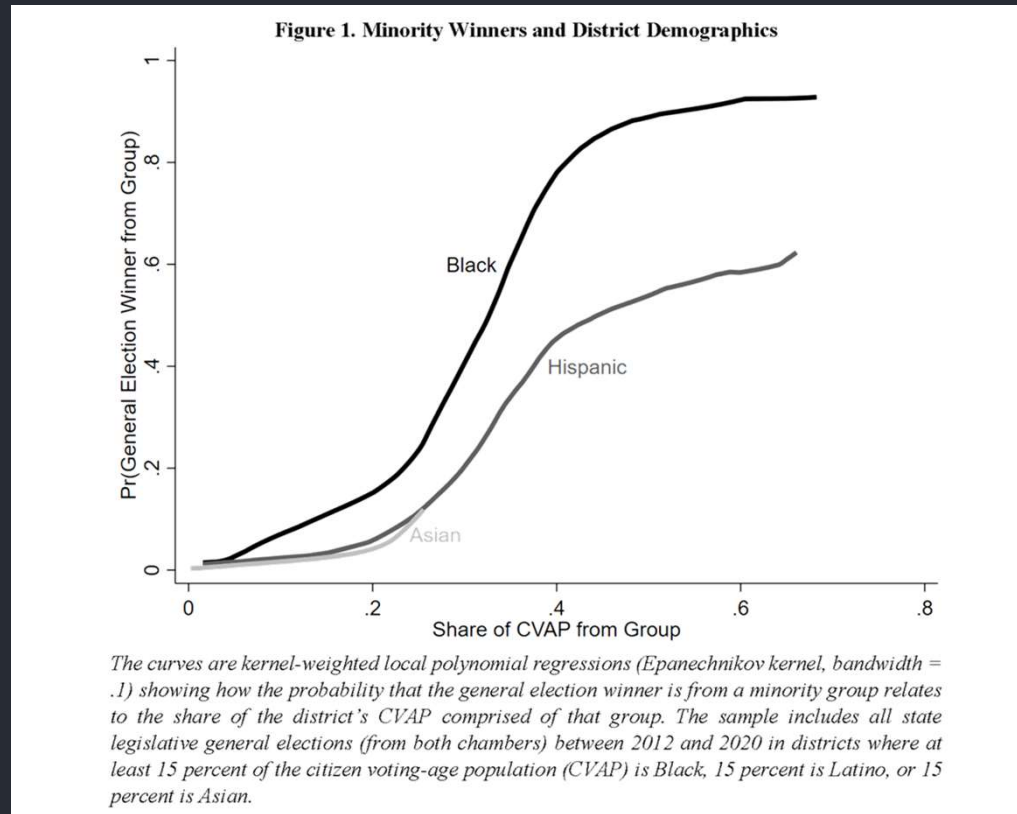
Table 6. Assessing Competitiveness While Controlling for Partisanship				
	Primary Unc.	General Unc.	Both Unc.	Appointment
Black District	-.115 (.072)	.201 (.095)	.066 (.103)	.084 (.044)
Latino District	-.164 (.067)	.189 (.101)	.017 (.115)	.079 (.042)
District Partisanship	-.350 (.202)	1.324 (.333)	.715 (.345)	-.180 (.143)
Assembly Fixed Effects	X	X	X	X
Observations	282	356	282	356

District-clustered standard errors in parentheses

– Ex. C at 16

Figure 1. Minority Winners and District Demographics

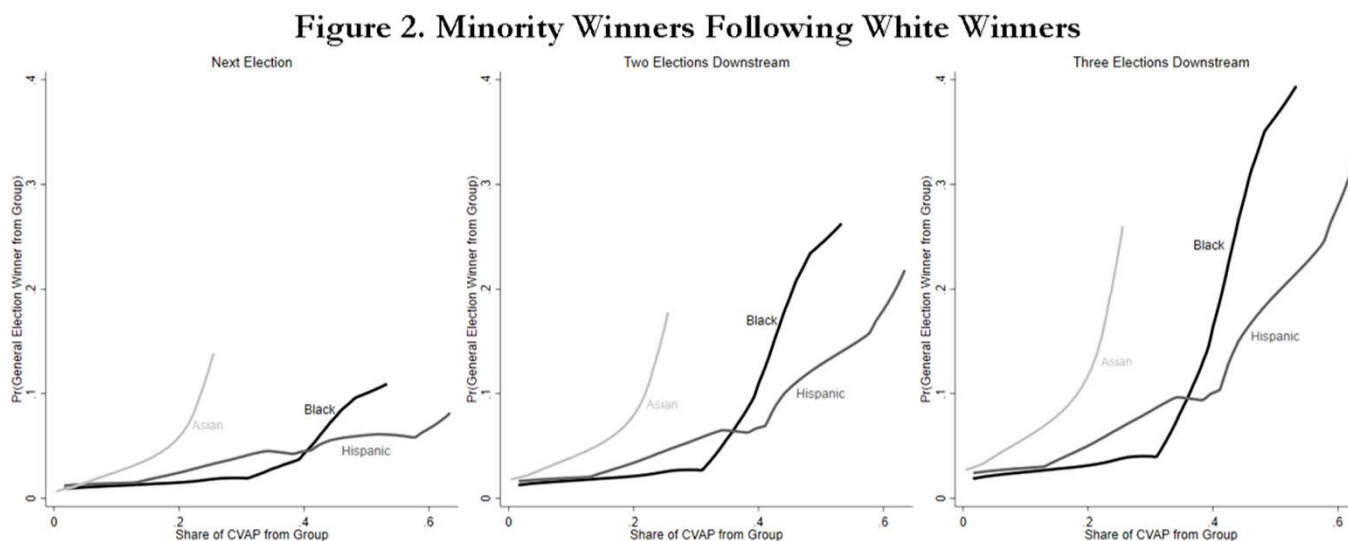
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— Ex. C at 17

Figure 2. Minority Winners Following White Winners

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The figure replicates the analysis in Figure 1 but focuses on cases where a white candidate previously won. The left panel shows the probability of a minority winner in the next election after a white candidate's victory, the middle panel shows the same thing two elections downstream, and the right panel shows three elections downstream.

— Ex. C at 18

Chen

Table 1

Table 10

Table 5

Table 11

Table 1.

Racial and Ethnic Demographics of Districts in Plaintiffs' Remedial Plan

Jowei Chen
Expert Report

Table 1: Racial and Ethnic Demographics Of Districts in Plaintiffs' Remedial Plan:							
District:	Total Population (2020 Census)	Latino Share of 2020 Census Population:	Single-Race Black Share of 2020 Census Population:	Latino Share of 2020 Census VAP:	Single-Race Black Share of 2020 Census VAP:	Latino Share of 2015-2019 ACS CVAP:	Single-Race Black Share of 2015- 2019 ACS CVAP:
Cook County Districts:							
1	108,538	65.5%	5.7%	61.9%	5.8%	51.0%	7.9%
2	108,564	65.5%	3.2%	61.7%	3.3%	50.9%	4.6%
3	108,473	63.8%	7.6%	60.2%	7.7%	50.8%	9.3%
4	108,674	62.5%	2.9%	58.6%	2.8%	51.6%	2.5%
21	108,592	62.9%	6.3%	59.7%	6.2%	50.6%	6.3%
22	108,544	64.6%	4.0%	60.4%	4.0%	51.4%	5.1%
23	108,576	69.6%	8.2%	66.0%	9.3%	51.5%	17.3%
24	108,568	61.0%	4.7%	57.9%	4.7%	51.0%	5.7%
32	108,578	68.0%	10.1%	64.1%	10.7%	51.1%	15.8%
39	108,602	58.6%	10.2%	55.8%	9.8%	50.3%	11.1%
40	108,615	22.4%	5.1%	21.1%	4.7%	19.1%	5.2%
77	108,529	63.3%	3.6%	58.7%	3.7%	51.4%	3.0%
Aurora District (DuPage and Kane Counties):							
50	108,634	66.5%	8.5%	62.0%	8.5%	46.8%	11.3%
Metro East District (Madison and St. Clair Counties):							
114	108,395	5.9%	55.1%	4.9%	52.2%	2.5%	51.3%

— Ex. B at 6

Table 5. List of Elections Analyzed

Jowei Chen
Expert Report

Elections in Cook County:
2015 Chicago Mayoral General
2018 Cook County Assessor Primary
2016 Illinois Comptroller General
2012 HD-35 General
2012 HD-39 Primary
2012 HD-40 General
2014 HD-39 Primary
2014 HD-40 Primary
2014 HD-77 Primary
2016 HD-10 General
2016 HD-2 Primary
2016 HD-22 Primary
2016 HD-24 General
2016 HD-4 Primary
2016 HD-5 Primary
2016 SD-22 General
2016 SD-22 Primary
2016 SD-5 Primary
2018 HD-1 Primary
2018 HD-5 Primary
2018 SD-20 Primary
2018 SD-25 Primary
2020 HD-10 Primary
2020 SD-11 General
2020 SD-22 Primary
2020 SD-40 Primary

Elections around Metro East (East St. Louis):
2016 HD-114 General
2018 SD-57 General
2020 HD-114 General

– Ex. B at 34

Table 10. Predicted Support for Latino-Preferred Candidate Within Cook County Districts in the August 31, 2021 Enacted Plan

Jowei Chen
Expert Report

Table 10:
Predicted Support for Latino-Preferred Candidate within Cook County Districts in the August 31, 2021 Enacted Plan

District:	Latino VAP:	Non-Latino White VAP:	Latino Support for Latino- Preferred Candidate (Berrios):	White Support for Latino-Preferred Candidate (Berrios):	Estimated Overall Vote Share of Latino- Preferred Candidate (Berrios):
1	76.1%	13.6%	75.4%	22.3%	62.0%
2	64.6%	29.1%	82.5%	26.3%	55.4%
3	54.1%	35.6%	73.8%	22.7%	45.5%
4	52.6%	30.3%	76.7%	18.8%	48.7%
19	27.3%	59.2%	79.0%	23.0%	37.9%
21	51.7%	37.7%	76.8%	25.2%	48.1%
22	62.8%	32.6%	83.2%	22.8%	61.5%
23	84.4%	4.5%	66.0%	35.7%	63.0%
24	48.5%	19.2%	67.0%	24.6%	49.3%
39	51.6%	38.6%	76.6%	20.3%	43.1%
40	42.8%	40.5%	72.2%	24.2%	43.0%

Note: The predicted “Support for Latino-Preferred Candidate” percentages in this table are calculated using the precinct-level EI analysis of the 2018 Cook County Assessor primary election between Joseph Berrios and Fritz Kaegi. Berrios was the Latino-preferred candidate, and this table reports the predicted percentage of each group’s voters that are estimated to have supported Berrios within each district.

— Ex. B at 46

Table 11. Predicted Support for Latino-Preferred Candidate Within Cook County Districts in Plaintiffs' Remedial Plan

Jowei Chen
Expert Report

Table 11:
Predicted Support for Latino-Preferred Candidate within Cook County Districts in Plaintiffs' Remedial Plan

District:	Latino VAP:	Non-Latino White VAP:	Latino Support for Latino- Preferred Candidate (Berrios):	White Support for Latino-Preferred Candidate (Berrios):	Estimated Overall Vote Share of Latino- Preferred Candidate (Berrios):
1	61.9%	29.2%	75.0%	27.0%	56.8%
2	61.7%	32.3%	79.4%	24.7%	57.2%
3	60.2%	23.4%	72.8%	27.6%	53.2%
4	58.6%	33.4%	73.5%	30.9%	52.6%
21	59.7%	30.9%	78.7%	24.9%	49.2%
22	60.4%	32.8%	81.3%	27.8%	56.2%
23	66.0%	12.4%	69.2%	23.3%	56.1%
24	57.9%	14.6%	63.9%	26.0%	50.6%
32	64.1%	23.1%	80.8%	30.2%	65.7%
39	55.8%	29.2%	76.8%	22.6%	50.1%
40	21.1%	65.2%	80.4%	16.8%	31.1%
77	58.7%	33.8%	72.0%	36.5%	56.2%

Note: The predicted "Support for Latino-Preferred Candidate" percentages in this table are calculated using the precinct-level EI analysis of the 2018 Cook County Assessor primary election between Joseph Berrios and Fritz Kaegi. Berrios was the Latino-preferred candidate, and this table reports the predicted percentage of each group's voters that are estimated to have supported Berrios within each district.

— Ex. B at 47

Tables

Minority Districts

Minority Winners

Table A1

Table A3

Table A2

Table A4

Table A1. Minority Winners and District Demographics

Dr. Anthony Fowler,
Rebuttal Report

Table A1. Minority Winners and District Demographics

CVAP Share	Black			Latino		
	local	logit	bin	local	logit	bin
0	.013	.011		.008	.011	
.05	.027	.022	.000	.016	.018	.000
.1	.070	.044		.024	.028	
.15	.109	.086	.058	.034	.045	.009
.2	.152	.160		.058	.070	
.25	.235	.278	.478	.113	.109	.259
.3	.407	.439		.204	.164	
.35	.605	.614	.375	.340	.241	.45
.4	.780	.763		.454	.338	
.45	.856	.867	1.000	.504	.452	.452
.5	.889	.930		.539	.570	
.55	.905	.964	.86	.566	.681	.85
.6	.923	.982		.584	.775	
.65	.925	.991	1.000	.61	.847	.467

The table summarizes the results of Figure 1 in the rebuttal report. For every 5-percentage-point interval of a minority group's share of a district's CVAP, the table shows the predicted probability of a minority general election winner. The "local" columns show the results from a local polynomial regression. The "logit" columns show the predicted probabilities from a logit regression. The "bin" columns show the observed averages for 10-percentage-point bins.

Table A2.**Minority Winners and District Demographics, White Winner Last Election**

Dr. Anthony Fowler,
Rebuttal Report

Table A2. Minority Winners and District Demographics, White Winner Last Election

CVAP Share	Black			Latino		
	local	logit	bin	local	logit	bin
0	.007	.003		.009	.011	
.05	.009	.004	.000	.011	.014	.000
.1	.010	.006		.016	.017	
.15	.011	.009	.025	.023	.021	.023
.2	.012	.013		.031	.026	
.25	.014	.019	.000	.042	.031	.067
.3	.015	.027		.054	.038	
.35	.023	.039	.000	.065	.047	.2
.4	.038	.055		.067	.057	
.45	.071	.077		.069	.07	.000
.5	.098	.107		.058	.085	
.55			.143	.057	.103	.000
.6				.063	.124	
.65						.143

The table is the same as Table A1 but conditions on cases where the last election was won by a white candidate.

Table A3.**Minority Winners and District Demographics, White Winner Two Elections Prior**

Dr. Anthony Fowler,
Rebuttal Report

**Table A3. Minority Winners and District Demographics,
White Winner Two Elections Prior**

CVAP Share	Black			Latino		
	local	logit	bin	local	logit	bin
0	.009	.003		.013	.012	
.05	.012	.005	.000	.015	.015	.000
.1	.014	.008		.023	.020	
.15	.015	.012	.037	.032	.027	.032
.2	.017	.020		.044	.035	
.25	.020	.031	.000	.059	.046	.100
.3	.022	.048		.075	.060	
.35	.049	.075	.000	.090	.079	.250
.4	.101	.115		.095	.102	
.45	.182	.172		.115	.131	.000
.5	.240	.249		.119	.167	
.55			.333	.136	.210	.000
.6				.166	.261	
.65						.333

The table is the same as Table A1 but conditions on cases where the seat was won by a white candidate two elections prior.

Table A4.**Minority Winners and District Demographics, White Winner Three Elections Prior**

Dr. Anthony Fowler,
Rebuttal Report

**Table A4. Minority Winners and District Demographics,
White Winner Three Elections Prior**

CVAP Share	Black			Latino		
	local	logit	bin	local	logit	bin
0	.017	.005		.023	.011	
.05	.022	.009	.000	.027	.016	.000
.1	.025	.014		.029	.022	
.15	.028	.022	.077	.036	.030	.056
.2	.031	.035		.050	.042	
.25	.038	.055	.000	.067	.057	.000
.3	.040	.086		.083	.079	
.35	.085	.131	.000	.096	.107	.333
.4	.164	.195		.101	.144	
.45	.288	.280		.159	.191	.000
.5	.365	.385		.195	.248	
.55			.500	.226	.316	
.6				.280	.393	
.65						.500

The table is the same as Table A1 but conditions on cases where the seat was won by a white candidate three elections prior.

Other Tables

Compactness of Minority Districts

District Cores

Dilution of Minority Influence

Corrections to Dr. Lichtman's List of "Targeted" Incumbents (Table 3)

Election Performance Analyses By Drs. Chen and Lichtman

Lichtman Table 9

Corrected Lichtman Table 9

Plaintiffs' Remedial Plan

Compactness of Minority Districts

Minority Districts within Plaintiffs' Remedial Map are generally more compact than those within the September Map.

House District	September Map	Plaintiffs' Remedial Map
Northern Cook County		
3	0.124	0.187
4	0.179	0.241
39	0.210	0.248
40	0.225	0.241
77	0.210	0.223
Regional Average	0.190	0.228
Aurora		
50	0.451	0.278
Metro East		
114	0.237	0.370

House District	September Map	Plaintiffs' Remedial Map
Southern Cook County		
1	0.147	0.206
2	0.295	0.277
21	0.126	0.301
22	0.535	0.242
23	0.286	0.409
24	0.197	0.290
32	0.100	0.400
Regional Average	0.241	0.304
Statewide Average	0.237	0.280 (+18%)

Compactness scores using Polsby-Popper method.

Source: Report of Dr. Jowei Chen (Nov. 10, 2021) at Tables 3 and 4, 1:21-cv-03091, Dkt. 151-2.

District Cores

As measured by population, the cores of September Plan districts that are impacted by Plaintiffs' Remedial Plan are generally preserved.

Remedial Plan House District	Unchanged Population Core (Equivalent Sept. Plan House Dist.)
Challenged Minority Districts	
1	41%
2	56% (22)
3	58% (40)
4	39% (39)
21	64%
22	75% (2)
23	39%
24	67%
32	40% (22)
39	41% (4)
40	31% (39)
50	71%
77	70%
114	57% (113)
Average	53%

Remedial Plan House District	Unchanged Population Core
Other Impacted Districts	
6	81%
8	97%
20	75%
31	44%
35	70%
36	46%
41	94%
44	99%
46	94%
47	99%
48	86%
55	75%
56	71%
82	91%
83	85%
84	79%
112	75%
113	43%
Average	78%

Source: Plaintiffs' Brief (Nov. 10, 2021) at Exhibit 5, 1:21-cv-03091, Dkt. 151-5.

Dilution of Minority Influence

In districts with non-Latino/Black incumbents, Latino/Black population (as measured by CVAP) was generally reduced and kept below 50%.

House District	CVAP of Current District (2012-2016 CVAP)	CVAP of September Plan District (2015-2019 CVAP)
Northern Cook County		
3	57.2%	47.7%
4	40.8%	45.3%
39	48.6%	45.7% (White incumbent)
40	37.4%	34.7%
77	42.3%	43.6% (White incumbent)
Southern Cook County		
1	59.4%	64.8% Packed
2 (Current 24)	62.6%	55.3%
21 (Current 23)	39.1%	42.7% (White incumbent)
22	56.6%	52.7%
23 (Current 21)	52.6%	71.1% Packed
24 (Current 2)	46.2%	43.8% (Asian incumbent)
Aurora		
50 (Current 83)	39.0%	36.8%
Metro East		
114	42% (VAP)	34.7% (VAP)

Source: Report of Dr. Jacob M. Grumbach (Nov. 7, 2021) at Table A2, 1:21-cv-03139, Dkt. 135-19; Report of Dr. Jowei Chen (Nov. 10, 2021) at Table 2, 1:21-cv-03091, Dkt. 151-2; and H. Res. 385, 97th Ill. Gen. Assem. (2011). The CVAP of current HD 114 (which was drawn and enacted in 2011) is not available in the record, so VAP is used here.

Corrections to Dr. Lichtman's List of "Targeted" Incumbents (Table 3)

Dr. Lichtman erroneously claimed that dozens of Democratic incumbents were "targeted" by the McConchie and Contreras plaintiffs' remedial plans. No incumbents were intentionally "targeted." Moreover, many of those claims are plainly inaccurate, as shown below.

District	Incumbent (Dr. Lichtman Notes)	Corrections
HD 3	Eva Dino Delgado – "First Elected 2020"	Rep. Delgado was first appointed in 2019.
HD 4	Delia Ramirez	
HD-6	Sonya M. Harper	HD 6 is 81% unchanged. Rep. Harper is the only incumbent.
HD 23	Edgar Gonzalez Jr. – "First Elected 2020"	Rep. Gonzalez was first appointed in 2020.
HD 24 (Prior 2)	Theresa Mah	
HD 31	Mary Flowers	
HD-32	Cyril Nichols – "First Elected 2020"	Rep. Nichols was first appointed in 2021.
HD 40	Jaime Andrade Jr.	
HD-50 (Prior 83)	Barbara Hernandez	HD 50 becomes more Latino. Rep. Hernandez is the only incumbent.
HD 114	Latoya Greenwood	
SD 2	Omar Aquino	

Source: Sources: Plaintiffs' Brief (Nov. 10, 2021) at Exhibit 5, 1:21-cv-03091, Dkt. 151-5; Defendants' Response Brief (Nov. 24, 2021) at Figures 8, 10, and 14, 1:21-cv-03091, Dkt. 156; Report of Dr. Allan Lichtman (Nov. 24, 2021) at Table 3, 1:21-cv-03091, Dkt. 156-1; Declaration of Jon Maxson (Nov. 24, 2021) at Exhibit A, 1:21-cv-03091, Dkt. 156-2; Declaration of Joseph Sodowski (Nov. 24, 2021) at Exhibit A, 1:21-cv-03091, Dkt. 156-6.

Corrections to Dr. Lichtman's List of "Targeted" Incumbents (Table 3)

Dr. Lichtman erroneously claimed that dozens of Democratic incumbents were "targeted" by the McConchie and Contreras plaintiffs' remedial plans. No incumbents were intentionally "targeted." Moreover, many of those claims are plainly inaccurate, as shown below.

District	Incumbent (Dr. Lichtman Notes)	Corrections
SD 11 (Prior 12)	Steven Landek	
HD-8	LaShawn Ford	HD 8 is 97% unchanged. Rep. Ford is the only incumbent.
SD-5	Patricia Van Pelt	SD 5 is not changed at all by Plaintiffs' Remedial Plan.
SD-4	Kimberly Lightford	SD 4 is 98% unchanged. Sen. Lightford is the only incumbent.
SD-57	Christopher Belt	SD 57 is 87% unchanged. Sen. Belt is the only incumbent.
SD-25	Karina Villa – "First Elected in 2022"	SD 25 is 90% unchanged. Sen. Villa, who was first elected in 2020, is the only incumbent.
SD-14	Emil Jones III	SD 14 is not changed at all by Plaintiffs' Remedial Plan.
SD 12 (Prior 11)	Celina Villanueva	
SD 20	Cristina Pacione-Zayas	
SD-16	Jacqueline Collins	SD 16 is 61% unchanged. Sen. Collins is the only incumbent.
SD 1	Antonio Munoz	

Source: Sources: Plaintiffs' Brief (Nov. 10, 2021) at Exhibit 5, 1:21-cv-03091, Dkt. 151-5; Defendants' Response Brief (Nov. 24, 2021) at Figures 8, 10, and 14, 1:21-cv-03091, Dkt. 156; Report of Dr. Allan Lichtman (Nov. 24, 2021) at Table 3, 1:21-cv-03091, Dkt. 156-1; Declaration of Jon Maxson (Nov. 24, 2021) at Exhibit A, 1:21-cv-03091, Dkt. 156-2; Declaration of Joseph Sodowski (Nov. 24, 2021) at Exhibit A, 1:21-cv-03091, Dkt. 156-6.

Election Performance Analyses By Drs. Chen and Lichtman

Dr. Chen analyzed the effectiveness of Cook County districts using the 2018 Cook County Assessor Democratic primary election (Berrios vs. Kaegi). By contrast, Dr. Lichtman describes an analysis of some, but not all, of those districts performed by House Democratic staff member Jon Maxson using the 2015 Chicago mayoral election (Garcia vs. Emanuel).

House District	Can Be Analyzed With Assessor Election (Wholly Included Within Cook County)	Can Be Analyzed With Mayoral Election (Wholly Included Within City of Chicago)
1	Yes	No
2	Yes	No
3	Yes	Yes
4	Yes	Yes
21	Yes	No
22	Yes	No
23	Yes	No
24	Yes	Yes
32 (Plaintiffs')	Yes	No
39	Yes	Yes
40	Yes	Yes (but omitted from Dr. Lichtman's Report without explanation)
77 (Plaintiffs')	Yes	No

Source: Report of Dr. Allan Lichtman (Nov. 24, 2021), 1:21-cv-03091, Dkt. 156-1.

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GARNER & ARMSTRONG, LLC