

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUSAN SOTO PALMER, et. al.,

Plaintiffs,

v.

STEVEN HOBBS, et. al.,

Defendants,

and

JOSE TREVINO, ISMAEL CAMPOS, and
ALEX YBARRA,

Intervenor-Defendants.

Case No.: 3:22-cv-05035-RSL

Judge: Robert S. Lasnik

**PARTIES’ JOINT SUBMISSION
OF PROPOSED SPECIAL
MASTER CANDIDATES**

BACKGROUND

On October 4, 2023, this Court issued an order directing the Parties to “confer regarding nominees to act as Special Master to assist the Court” in assessing and modifying as necessary the remedial district maps to be submitted by the parties. Dkt. # 230 at 2. “In the event the parties are unable to reach agreement” on a remedy map, among other things, the court further ordered that the parties “jointly identify three candidates for the Special Master position” and that the parties provide their respective positions on each candidate. *Id.* at 2-3. Pursuant to that Order, the Parties held a meet-and-confer on November 16, 2023, and were unable to reach an agreement on a remedy map, and now, pursuant to the Order of the Court jointly submit this filing with their respective nominees and positions.

1 Plaintiffs, the State of Washington, and Intervenor-Defendants have each identified one
2 candidate and have provided their positions on the other two candidates. Secretary of State Hobbs
3 takes no position on the candidates.

4 NOMINATIONS

5 A. Plaintiffs' Nomination: Mr. David Ely, Compass Demographics

6 Mr. David Ely is the President and Founder of Compass Demographics, a consulting and
7 database management firm that specializes in election data, redistricting, demographic analysis,
8 and voter behavior. Ex. A (Ely CV). In 2023, Mr. Ely served as the cartographer on the special
9 master team in the Northern District of Alabama in *Milligan v. Allen*, and in 2019 was selected to
10 serve as a special master in the Middle District of Louisiana in *Terrebonne Parish NAACP et al*
11 *vs. Governor of Louisiana. Id.* at 4. In *Allen*, the court noted that no party objected to Mr. Ely's
12 appointment. *Singleton v. Allen*, No. 2:21-CV-1291-AMM, 2023 WL 6567895, at *5, *7-*9 (N.D.
13 Ala. Oct. 5, 2023). The court ultimately adopted the map that Mr. Ely had drawn and analyzed. *Id.*
14 at *17.

15 Mr. Ely has also served as an expert and testified on behalf of both plaintiffs and defendant
16 jurisdictions in voting-rights litigation, as well as for the United States. He has more than three
17 decades of experience researching and consulting on redistricting and elections matters, including
18 serving as a consultant or expert witness in over 40 voting rights and redistricting cases. Ex. A at
19 4-5. Mr. Ely has also assisted more than 40 state and local jurisdictions as a consultant during their
20 redistricting processes on matters ranging from database construction and demographic and voter
21 analysis to the development of districting plans and analysis of alternative redistricting plans. *Id.*
22 at 1-3. He has extensive experience managing redistricting projects, analyzing voting behavior,
23 and working with demographic data.
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1 Mr. Ely's CV is attached as Exhibit A, and an affidavit stating his interest and availability
2 is attached as Exhibit B.

3
4 **State of Washington's position on Mr. Ely:**

5 The State believes that David Ely is an excellent candidate to serve as a special master. As
6 the three-judge court noted in appointing Mr. Ely as a cartographer in *Milligan v. Allen*, "Mr. Ely
7 has extensive experience as a map-drawer, consultant, and expert on districting plans. He has
8 drawn maps and provided expert consulting services for cities, counties, and other legislative
9 bodies in Texas, California, Utah, Pennsylvania, Ohio, Massachusetts, and Illinois. He has also
10 previously recommended remedial plans to a federal district court to remedy a Voting Rights Act
11 in his capacity as a special master in a redistricting case in Louisiana. Based on the current
12 information before the Court, the Court finds David R. Ely well qualified to serve as the Court's
13 cartographer in this case." ECF No. 204, *Milligan v. Allen*, Case No. 2:21-cv-1530-AMM (N.D.
14 Ala., Aug. 2, 2023); *see also* ECF No. 385, *Terrebonne Parish Branch NAACP vs. Piyush*
15 *"Bobby" Jindal*, Case No, 3:14-cv-00069-SDD-EWD (M.D. La., Mar, 15, 2019) ("[T]he Court
16 finds that David R. Ely is best qualified to serve as Special Master in this case. Mr. Ely has
17 extensive experience addressing issues like those presented herein, and there is no suggestion that
18 Mr. Ely would investigate the appropriate remedy in this matter in a partisan manner.").

19 Mr. Ely's fairly extensive history in serving as a plaintiff-side expert could support an
20 inference of bias, but in light of his prior courts appointments as a neutral expert, the State does
21 not have concerns with Mr. Ely's possible appointment.

22 **Intervenor-Defendants' position on Mr. Ely:**

23 Intervenor-Defendants recommend against the appointment of Mr. David Ely. Mr. Ely's
24 opinions in voting rights cases have repeatedly been criticized by courts. *See, e.g., Benavidez v.*
25 *Irving Indep. Sch. Dist.*, 2014 U.S. Dist. LEXIS 113239, *20 (court rejects a portion of Mr. Ely's
26 opinions because Ely relied on data that he rejected in arriving at another one of his expert

1 opinions); *Kumar v. Frisco Indep. Sch. Dist.*, 476 F. Supp. 3d 439, 472-481 (court finds portion of
2 Ely's methods produced "unreliable" results. The data Ely relied on was "error-prone". As such,
3 the court declined to consider opinions that relied on this unreliable data). Mr. Ely lacks advanced
4 degrees and research experience that lend credibility to his analysis. Finally, Mr. Ely almost
5 exclusively serves as an expert for plaintiffs and appears to have primarily provided expert
6 opinions that uniquely favor plaintiffs in litigation.

7 Given the presence of other, qualified candidates ready and willing to serve as special
8 master, Intervenor-Defendants recommend against Mr. Ely's selection.

9
10 **B. State of Washington's Nomination: Karin Mac Donald, Q2 Data & Research, LLC**

11 The State recommends the Court appoint Karin Mac Donald as special master in this
12 matter. As detailed in her CV, Ms. Mac Donald has extensive experience serving as a consultant
13 to government entities and independent commissions in complicated redistricting matters,
14 including as the principal consultant to the California Citizens Redistricting Commission in 2021
15 and 2011 to construct assembly, senate, and congressional districts for California. She is the
16 current Director of the Statewide Database, which is the redistricting database for the State of
17 California that also provides non-partisan support and assistance to the general public, news media,
18 scholars, and legislators. She is also the Senior Researcher and Owner of Q2 Data & Research
19 LLC, a consulting firm which provides qualitative and quantitative research and technical services
20 for redistricting, elections, and election administration. Moreover, Ms. Mac Donald considers
21 herself strictly non-partisan; she is the only one of the three candidates who does not regularly
22 serve as a paid party expert witness in redistricting litigation. The State believes Ms. Mac Donald's
23 technical expertise, non-partisan stance, and commitment to public service, transparency, and
24 working with diverse stakeholders will be helpful to the Court in considering and entering a
25 remedial legislative district map.
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1 Ms. Mac Donald's CV is attached as Exhibit C and her statement of interest is attached as
2 Exhibit D.

3 **Plaintiffs' position on Ms. Mac Donald:**

4 Plaintiffs have no objection to the nomination of Ms. Mac Donald.
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6 **Intervenor-Defendants' position on Ms. Mac Donald:**

7 Intervenor-Defendants recommend against the appointment of Ms. Mac Donald as special
8 master. With the majority of her redistricting experience coming as an academic, she lacks the
9 practical experience that would be most helpful is advising the Court in this matter. Experience
10 serving as an expert in litigation and as a solely independent consultant are experiences that Ms.
11 Mac Donald lacks that would be a hinderance to her providing relevant and practical advice. State
12 legislative maps, such as the map at issue here, must take into account the practical realities of
13 circumstances that are not best understood in the ivory towers of academia alone, but coupled with
14 the realities of life that are only learned outside academia. This lack of practical, real-life
15 experience is evidenced when in 2018 Ms. Mac Donald was retained by both sides in litigation
16 (both the governmental entity and the local activists protesting the actions of that governmental
17 entity) pertaining to a city map involving Santa Monica, California. Jorge Casuso, "Top Voting
18 Demographics Expert Advised City, Activists on Santa Monica Redistricting," SANTA MONICA
19 LOOKOUT (Aug. 28, 2018), available at
20 [https://www.surfsantamonica.com/ssm_site/the_lookout/news/News-2018/August-](https://www.surfsantamonica.com/ssm_site/the_lookout/news/News-2018/August-2018/08_28_2018_Top_Voting_Demographics_%20Expert_Advised_City_Activists_on_Santa_Monica_Redistricting.html)
21 [2018/08_28_2018_Top_Voting_Demographics_%20Expert_Advised_City_Activists_on_Santa](https://www.surfsantamonica.com/ssm_site/the_lookout/news/News-2018/August-2018/08_28_2018_Top_Voting_Demographics_%20Expert_Advised_City_Activists_on_Santa_Monica_Redistricting.html)
22 [Monica_Redistricting.html](https://www.surfsantamonica.com/ssm_site/the_lookout/news/News-2018/August-2018/08_28_2018_Top_Voting_Demographics_%20Expert_Advised_City_Activists_on_Santa_Monica_Redistricting.html) (Discussing Ms. Mac Donald providing advice to conflicting parties in
23 litigation).
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1 Additionally, it does not appear that Ms. Mac Donald has practical experience applying
2 “traditional districting principles such as maintaining communities of interest and traditional
3 boundaries,” *Bush v. Vera*, 517 U.S. 952, 977 (1996), or other important factors like “preserving
4 the cores of prior districts and avoiding contests between incumbent Representatives,” *Karcher v.*
5 *Daggett*, 462 U.S. 725, 740 (1983), which are important considerations to help ensure the
6 democratic legitimacy of a state legislative district map drawn by a federal court.
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8 While the lack of regular involvement with litigation might give the appearance of neutrality,
9 in this case, the Court needs a special master who has experience providing advice within the
10 constructs of litigation. For these reasons, Ms. Mac Donald is not the Court’s best option to serve
11 as special master.

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13 **C. Intervenor-Defendants’ Nomination: Dr. Douglas Johnson, National Demographics
14 Corporation**

15 Intervenor-Defendants recommend the Court appoint Dr. Douglas Johnson as special
16 master in this matter. As detailed in his CV, Dr. Johnson has extensive experience serving as a
17 primary map drawer or consultant for hundreds of independent commissions and local
18 jurisdictions—the vast majority of these maps were adopted within the footprint of the Ninth
19 Circuit. Dr. Johnson has also served as an expert in multiple courts across the country where he
20 has been qualified as an expert. *See, e.g., Navajo Nation v. Arizona Indep. Redistricting Comm'n*,
21 230 F. Supp. 2d 998, 1011 (“The Court finds Mr. Johnson qualified to provide the opinions given
22 and finds them reliable.”). Dr. Johnson is the President of National Demographics Corporation
23 where he, along with his qualified team of consultants, use their over 40 years of experience to
24 provide advice to local governments, states, and organizations primarily across California and
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1 Arizona. Dr. Johnson has served credibly as an expert in many state court cases, that were all but
2 ignored by the other parties. Additionally, most of the cherry-picked cases discussing Dr. Johnson
3 are either currently on appeal or have been reversed on appeal. With Dr. Johnson you get a special
4 master who as worked with non-partisan independent commissions across the Ninth Circuit
5 footprint, you also get someone who has substantial educational training and teaching experience,
6 as well as a professional who knows how to navigate a legal proceeding—no other special possess
7 all three of these qualities.
8

9 Dr. Johnson’s CV is attached as Exhibit E and a statement of interest is attached as Exhibit
10 F.

11 **Plaintiffs’ position on Dr. Johnson:**

12 Plaintiffs object to the appointment of Dr. Johnson as a special master in this case. In every
13 case Dr. Johnson lists on his CV where he testified as an expert witness, the court rejected his
14 testimony. *See Covington v. North Carolina*, 283 F. Supp. 3d 410, 450 (M.D.N.C. 2018) (Johnson
15 analysis and opinion “unreliable and not persuasive”); *Luna v. Cnty. of Kern*, 291 F. Supp. 3d
16 1088, 1137 (E.D. Cal. 2018) (Johnson’s testimony “insufficient” and argument based on it “lacks
17 merits”); *Garrett v City of Highland*, 2016 WL 3693498, at *2 (Cal. Super. Apr. 06, 2016)
18 (Johnson methodology “inappropriate”); *Jauregui v City of Palmdale*, No. BC483039, 2013 WL
19 7018375, at *2 (Cal. Super. Dec. 23, 2013) (Johnson’s work “unsuitable” and “troubling”). In a
20 more recent case in which Dr. Johnson testified that does not appear on his CV, the court found
21 Dr. Johnson’s mapping analysis “unpersuasive” and “join[ed] other courts in rejecting Dr.
22 Johnson’s methodologies, analyses, and conclusions.” *Common Cause v. Lewis*, No. 18 CVS
23 014001, 2019 WL 4569584, at *95 (N.C. Super. Sep. 3, 2019) *abrogated on other grounds by*
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1 *Harper v. Hall*, 886 S.E.2d 393, 447 (N.C. 2023). Dr. Johnson’s explanations “appear[ed] to be
2 purely speculative,” “d[id] not withstand minimal scrutiny,” and were “not credible,” and his map
3 “suffered from a critical error.” *Id.* at *44. The *Common Cause* court also struck large portions of
4 Dr. Johnson’s testimony and report under Rule 702 and Rule 403 “after it was uncovered on cross-
5 examination that Dr. Johnson had made a series of significant errors.” *Id.* at *96. Another court
6 recently rejected a remedial plan Dr. Johnson drew for the City of Jacksonville, because it “fail[ed]
7 to meaningfully remedy the violation” of voters’ rights. *Jacksonville Branch of the NAACP v. City*
8 *of Jacksonville*, No. 3:22-cv-493-MMH-LLL (M.D. Fla. Dec. 19, 2022) (order) at 56.

10 Dr. Johnson has been repeatedly accused of drawing maps specifically to advantage white
11 incumbents at the expense of Latino voters. *See* Monica Valez, *Selma Is Moving to District*
12 *Elections. Some Say the Proposed Districts Don’t Represent the Community*, KVPR (Sep. 6,
13 2019), [https://www.courthousenews.com/judges-scrap-republicans-expert-in-nc-gerrymandering-](https://www.courthousenews.com/judges-scrap-republicans-expert-in-nc-gerrymandering-trial/)
14 [trial/](https://www.courthousenews.com/judges-scrap-republicans-expert-in-nc-gerrymandering-trial/); David Daley, *Will Arizona’s relentless Republican gerrymander decide the 2024*
15 *presidential election?*, Salon (Dec. 4, 2021), [www.salon.com/2021/12/04/will-arizonas-relentless-](http://www.salon.com/2021/12/04/will-arizonas-relentless-gerrymander-decide-the-2024-presidential-election/)
16 [gerrymander-decide-the-2024-presidential-election/](http://www.salon.com/2021/12/04/will-arizonas-relentless-gerrymander-decide-the-2024-presidential-election/). In addition, Dr. Johnson and his firm are
17 considered biased and controversial. *See id.*; *see also* Kasey Bubnash, *Redistricting commission*
18 *votes to keep controversial demographer*, Santa Maria Sun (Jan. 27, 2021),
19 [https://www.santamariasun.com/news/redistricting-commission-votes-to-keep-controversial-](https://www.santamariasun.com/news/redistricting-commission-votes-to-keep-controversial-demographer-14799563)
20 [demographer-14799563](https://www.santamariasun.com/news/redistricting-commission-votes-to-keep-controversial-demographer-14799563). Because of the lack of credibility courts have afforded Dr. Johnson, his
21 history of drawing or supporting maps that specifically disadvantage Latino voters, and his biases
22 evident in his work, it would be inappropriate for Dr. Johnson to serve as Special Master in this
23 case, and Plaintiffs oppose his nomination for that role.
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2 **State of Washington’s position on Dr. Johnson:**

3 The State recommends against the appointment of Dr. Douglas Johnson. Dr. Johnson’s
4 opinions in voting rights cases have repeatedly been rejected by courts. As one court recently
5 summarized:

6 Dr. Johnson has testified as a live expert witness in four cases previously, and the
7 courts in all four cases have rejected his analysis. [*S*]ee *Covington*[v. *North*
8 *Carolina*, 283 F. Supp. 3d 410, 450 (M.D.N.C. 2018), *aff’d in relevant part*, 138 S.
9 Ct. 2548 (2018)] (finding “Dr. Johnson’s analysis and opinion . . . unreliable and
10 not persuasive”); *Luna v. Cnty. of Kern*, 291 F. Supp. 3d 1088, 1137 (E.D. Cal.
11 2018) (holding that defendants' argument based on Dr. Johnson’s analysis “lacks
12 merits”); *Garrett v City of Highland*, 2016 WL 3693498, at *2 (Cal. Super. Apr.
06, 2016) (finding Dr. Johnson's methodology “inappropriate”); *Jauregui v City of*
Palmdale, No. BC483039, 2013 WL 7018375, at *2 (Cal. Super. Dec. 23, 2013)
(describing Dr. Johnson's work in the case was “unsuitable” and “troubling”). This
Court joins these other courts in rejecting Dr. Johnson's methodologies, analyses,
and conclusions.

13 *Common Cause v. Lewis*, No. 18 CVS 014001, 2019 WL 4569584, at *95 (N.C. Super. Ct. Sep. 3,
14 2019), *abrogated on other grounds by Harper v. Hall*, 384 N.C. 292, 376, 886 S.E.2d 393, 447
15 (2023) (record citation omitted); *see also Nairne v. Ardoin*, CV 22-178-SDD-SDJ, 2023 WL
16 7388850, at *3–4 (M.D. La. Nov. 8, 2023) (largely excluding Dr. Johnson’s proposed testimony
17 on racial predominance as beyond his expertise, “irrelevant,” “unhelpful,” “a waste of judicial and
18 party resources,” “[c]onclusory,” and “pejorative”); Tentative Ruling, *Sanchez v. City of Martinez*,
19 Case No. MSC18-02219 (Contra Costa (CA) Cnty. Super. Ct. May 3, 2019) (concluding that a
20 map drawn by Dr. Johnson “verges on self-parody in flouting [the compactness] criterion,” “was
21 consciously drawn to try to *cross* boundaries of community of interests,” and “went out of its way
22 to ensure that the districts cut across one of the main existing geographical dividers . . . , rather
23 than using it as a convenient boundary”) (emphasis in original); David Daley, “Ohio Speaker Cupp
24 gets nationally controversial, GOP-aligned mapmaker into redraw process,” OHIO CAPITAL
25 JOURNAL (Mar. 23, 2022), available at [https://ohiocapitaljournal.com/2022/03/23/ohio-speaker-](https://ohiocapitaljournal.com/2022/03/23/ohio-speaker-cupp-gets-nationally-controversial-gop-aligned-mapmaker-into-redraw-process/)
26 [cupp-gets-nationally-controversial-gop-aligned-mapmaker-into-redraw-process/](https://ohiocapitaljournal.com/2022/03/23/ohio-speaker-cupp-gets-nationally-controversial-gop-aligned-mapmaker-into-redraw-process/) (“Johnson is

1 among the nation's most controversial and GOP-aligned mapmakers.”) (hyperlinked citations
2 omitted).

3 Given the presence of other, qualified candidates ready and willing to serve as special
4 master, the State recommends against Dr. Johnson's selection.

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8 Dated: December 1, 2023

Respectfully submitted,

9 By: /s/Annabelle Harless

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CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 1st day of
December 2023, via the Court’s CM/ECF system.

s/Annabelle Harless
Annabelle Harless
Counsel for Plaintiffs

Exhibit A

VITA

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Employment:

2007 to present

David Ely is the president and founder of Compass Demographics, a consulting and database management firm specializing in projects involving census and election data, redistricting projects, demographic analysis, and analysis of voting behavior.

1986 to 2007

Director of Research for the Redistricting and Reapportionment practice of Pactech Data and Research, Pasadena, California. As Director of Research, Mr. Ely testified or consulted to counsel in a variety of litigation involving the configuration of election districts as well as providing database construction and redistricting consulting for numerous jurisdictions.

Education:

California Institute of Technology in Pasadena, CA with a B.S. in Social Sciences and Mechanical Engineering in 1987.

Redistricting Consulting

Activities include database construction, demographic and voter analysis, development of districting plans, public hearings and presentation of plans, technical assistance, and analysis of alternative redistricting plans.

2022 Mission Springs Water District Board Redistricting

2022 Desert Hot Springs Council District Formation

2022 Palmdale City Council Redistricting

2022 Alhambra City Council Redistricting

2022 Coalinga City Council Redistricting

2022 Coalinga-Huron Recreation & Parks Board Redistricting

David R. Ely, Vita, page 2

(Redistricting Consulting, cont.)

2022 Garden Grove City Council Redistricting

2021 Compton Unified School District Trustee Area Redistricting

2021 Pasadena City Council Redistricting

2021 Los Angeles County Supervisorial Redistricting

2021 Los Angeles City Council Redistricting

2020 Malibu City Council District Analysis

2020 Mission Springs Water District Board District Formation

2020 Richmond City Council District Formation

2019 Compton Unified School District Trustee District Formation

2019 Carson City Council District Formation

2018 Coalinga City Council District Formation

2018 Coalinga-Huron Recreation & Parks Board Member District Formation

2017 San Marcos Unified School District Trustee Area Formation

2016 Upland City Council District Formation

2016 Costa Mesa City Council District Formation

2015 Garden Grove City Council District Formation

2015 Fullerton City Council District Formation

2014 Saugus Union School District Trustee Area Formation

2014 Whittier City Council District Formation

2014 Sulphur Springs School District Trustee Area Formation

2014 Lancaster Elementary School District Trustee Area Formation

2012 Los Angeles Unified School District Redistricting

2012 Los Angeles City Council Redistricting

2012 Pasadena Unified School Board Districting

2012 Pasadena City Council Redistricting

David R. Ely, Vita, page 3

(Redistricting Consulting, cont.)

2011 Bay Area Rapid Transit (BART) Board Redistricting

2011 California Legislative Redistricting

2011 Los Angeles County Redistricting

2008 Ceres Unified School District Redistricting

2008 Madera Unified School District Redistricting

2008 Merced Elementary School District Redistricting

2008 Merced High School District Redistricting

2005 Hanford Joint Union High School District Redistricting

2003 Oakland City Council and Oakland Unified School Board Redistricting

2002 Los Angeles City Council Redistricting

2002 Los Angeles Unified School District Board Member Redistricting

2002 Pasadena, California, City Council Redistricting

2001 California Legislative Redistricting (Senate, Assembly, and Congressional)

2001 Los Angeles County Supervisorial Redistricting

2001 Bay Area Rapid Transit Board Member Districts Redistricting

1992 Rancho Mirage, California, City Council Redistricting

1992 Three Valleys Municipal Water District Redistricting

1992 Los Angeles Unified School Board Member Redistricting

1992 Los Angeles City Council Redistricting

1992 Pasadena, California, City Council Redistricting

1991 California Congressional Redistricting

1991 California State Assembly Redistricting

1991 Los Angeles County Board of Supervisors Redistricting

1987 City of Boston, Massachusetts Redistricting

1986 Los Angeles City Council Redistricting

1987 to 2012, California State Legislature, Redistricting Database construction

David R. Ely, Vita, page 4

Litigation Analysis

Activities include database construction, demographic analysis, expert witness testimony, surname matching, geocoding of registered and actual voter lists, and construction of illustrative districting plans.

2000-Present Provided analysis on numerous voting rights investigations not listed.

Milligan v. Allen (2023), Special Master team cartographer (Alabama)

Shafer and Murphey v. Pearland ISD (2023), expert witness (Texas)

Parietti v. Rockland County (2023), expert witness (New York)

Dixon v. Lewisville Independent School District (2022), expert witness (Texas)

Contreras et al v. Illinois State Board of Elections (2021)

Vaughan v. Lewisville Independent School District (2020), expert witness (Texas)

Kumar v. Frisco Independent School District (2020), expert witness (Texas)

Terrebonne Parish NAACP et al vs. Governor of Louisiana et al (2019), Special Master

Tyson v. Richardson Independent School District (2018), expert witness (Texas)

Yumori-Kaku v. City of Santa Clara (2018), expert witness (California)

Loya v. City of Santa Monica (2018), expert witness (California)

Luna v. Kern County (2017), expert witness (California)

Patino v. City of Pasadena (2015), expert witness (Texas)

Garrett v. City of Highland (2015), expert witness (California)

Ramos v. Carrollton-Farmers Branch Independent School District (2015), expert witness (Texas)

Rodriguez v. City of Grand Prairie (2015), expert witness (Texas)

Rodriguez v. Grand Prairie Independent School District (2014), expert witness (Texas)

Navajo Nation v. San Juan County (2014), expert witness (Utah)

Solis v. City of Santa Clarita (2014), expert witness (California)

Jauregui v. City of Palmdale (2013), expert witness (California)

Gonzalez v. City of Compton (2012), expert witness (California)

Fabela v. City of Farmers Branch (2011), expert witness (Texas)

David R. Ely, Vita, page 5

(Litigation Analysis, cont.)

Benavidez v. Irving Independent School District (2008, 2013), expert witness (Texas)

Benavidez v. City of Irving (2008), expert witness (Texas)

Avitia v. Tulare Local Health Care District (2008), expert witness (California)

U.S. v. City of Euclid (2007), election data consultant (Ohio)

Bexar Metropolitan Water District (2007), election data consultant (Texas)

U.S. v. City of Springfield, Massachusetts (2006)

U.S. v. State of Missouri (2006), election data consultant

U.S. v. City of Philadelphia and Philadelphia City Commission (2006), Pennsylvania

State of Georgia v. Ashcroft, (2004) election data consultant

Gomez v. Hanford Joint Union High School District, (2004) California

Sanchez v. City of Modesto, (2004), California

Governor Gray Davis v. Kevin Shelley, (2003) data analysis and declaration (California)

U.S. v. Alamosa County, (2002), expert witness (Colorado)

Cano v. Davis, (2002), election data consultant, (California)

U.S. v. City of Lawrence, (2000), expert witness (Massachusetts)

U.S. v. City of Santa Paula, (2000) voting rights litigation (California)

U.S. v. Upper San Gabriel Valley Municipal Water District, (2000) voting rights litigation (California)

U.S. v. Passaic (2000) voting rights litigation (New Jersey)

U.S. v. City of Lawrence, (1999) voting rights litigation (Massachusetts)

Bonilla v. Chicago City Council (1992-1998), expert witness (Illinois)

Ruiz v. City of Santa Maria, (1992-1998), expert witness (California)

Garza v. County of Los Angeles, (1988-90), Constructed databases and designed remedial plans for Los Angeles County Supervisorial Districts

Exhibit B

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUSAN SOTO PALMER, et. al.,

Plaintiffs,

v.

STEVEN HOBBS, et. al.,

Defendants,

and

JOSE TREVINO, ISMAEL CAMPOS, and
ALEX YBARRA,

Intervenor-Defendants.

Case No.: 3:22-cv-05035-RSL

Judge: Robert S. Lasnik

**AFFIDAVIT OF DAVID ELY
REGARDING SPECIAL MASTER
CANDIDACY**

Under Federal Rule of Civil Procedure 53(b) and this Court's Order (Dkt. 230), I declare the following:

I have familiarized myself with the identity of the parties in this case and with the Court's order for the parties to identify special master candidates. I can attest and affirm that I know of no grounds for disqualification under 28 U.S.C. § 455 that would prevent me from serving as Special Master in the above-captioned matter.

I am interested in serving as Special Master to assist the Court in the assessment of proposed remedial plans and to make modifications to those plans as necessary. I have the

1 capability and availability to serve as Special Master based on my understanding of the
2 requirements of doing so.

3
4 I declare under penalty of perjury that the foregoing is true and correct to the best of my
5 knowledge.
6

7
8 Executed on December 1, 2023.

9
10 

11 _____
12 David Ely

Exhibit C

**Curriculum Vitae
Karin Mac Donald**

Q2 Data & Research, LLC
1225 Peralta Street
Oakland, CA 94607
510.367.7527

UC Office
University of California,
School of Law
Berkeley, CA 94720-7200

Education

University of California, Berkeley, Department of Political Science, Ph.D. program 1997-1999
University of California, Berkeley, M.A. Political Science, 1998
(Thesis: A Case for Public Participation; Oakland: Communities define their Interests)
University of California, Berkeley, B.A., 1995

Professional Experience Summary

2012 - 2020 Election Administration Expert - University of California Election Observation and Technical Assistance Group; International Observer of Constitutional Referendum (Republic of Arshakh 2017); Team Leader of International Election Observer Group from 4 countries in Nagorno Karabakh (2015 Parliamentary Elections); Team Leader of California Election Observation Group in Nagorno Karabakh (2012 Presidential Election)

2010 - 2012 Director, Redistricting Group at Berkeley Law; design and implementation of outreach strategies to the public; establishment of redistricting assistance sites in 6 California jurisdictions 2010/2011; development of redistricting trainings and materials; design and teaching of workshops on data, criteria and voting rights for experts, journalists, advocates and the general public

2007 International Observer/Election Administration Expert in State Election of Baja, Mexico

2006 - Manager/Senior Researcher and Principal Consultant, Q² Data & Research LLC; specializing in Redistricting, Voting Rights, Election Administration, Implementation and Public Administration/Public Policy, Election and Census Data Research; Various California Voting Rights Act conversions from At-large to By-district election systems; Districtings and Redistrictings of Special Districts, including Transportation, Fire, Sanitation, Park, Hospital, Irrigation and School Districts (2008-ongoing); Principal Consultant to CA Citizen Redistricting Commission (2011/2021) and other local Commissions; Various Voting Rights Act research projects, California Voting Rights Act vulnerability studies and Racially Polarized Voting Analyses for Civil Rights groups and local jurisdictions (2008 – ongoing); Contracts with California Association of Clerks and Election Officials to design data collection instruments and interfaces; Study of election costs; Implementation Study of Vote Centers.

- 2005 - Director - Election Administration Research Center, University of California, Berkeley; Research Director - Evaluation of Poll Worker Training in California - Grant awarded 1/2005; Contracts with California Secretary of State’s office to study poll workers throughout the State of California (2006 and 2007); Online Voter Registration Study in Washington and Arizona funded by Pew Center on the States (2008-2010); Study of all mail-ballot elections in Yolo County (2013); Statewide study of Access to electoral system by residents of Long Term Care facilities in California (2013)
- 2000 – 2005 Owner - Karin Mac Donald – Data Consulting; various contracts in the areas of Redistricting (San Diego, San Francisco, Special districts), Public Opinion Research, Public Administration, Public Policy, Implementation, Election Administration, Election and Census data analysis, etc
- 1994 - Director - Statewide Database (Redistricting Database for California), University of California, Berkeley (funded annually through the California State Budget); Various research grants from Pew Charitable Trusts, The James Irvine Foundation, The JEHT foundation, etc. to study implementation of redistricting criteria and processes, and build longitudinal datasets that allow for pre/post redistricting analysis on the same unit of analysis. Construction of geographic datasets. California State Lead for Phase I of the Census Redistricting Data Program (delineation of block boundaries) in 1998, 2008 and 2016/2017. Liaison for the State of California to the Census Redistricting and Voting Rights Data office, 2008 - ongoing.
- 1995 Research Associate, UC DATA, Survey Research Center, UC Berkeley - California Work Pays Demonstration Project
- 1994 Research Assistant, UC DATA, Survey Research Center, UC Berkeley, Assistance Payments Demonstration Project

Awards

Co-recipient of the *Raymond Vernon Prize*, acknowledging outstanding contributions to the study and practice of policy analysis and public management, awarded annually by the American Association for Public Administration and Management, with Bonnie E. Glaser and Marcia Meyers, 1998

Recent Selected Census, Redistricting, Voting Rights Projects and Elections, Studies, Lectures, Talks and Trainings (UC Berkeley)

- 4/2023 Faculty; Rethinking Communities of Interest Mapping Summit; NAACP LDF, New Orleans, LA
- 2021 Implement Inmate Data Reallocation; Adjust Decennial Census Data for the State of California
- 2021 Revise research methodology to identify precincts statewide for language assistance requirements for Limited English Proficiency voters to adapt to new census privacy constraints: for CA Secretary of State
- 1/2021 Training: Census Data, Mapping Technology and Tools; at California Local Redistricting Training for City and County Officials
- 1/2021 Lecture: The Census and your Dataset; at National Conference of State Legislatures “Making the Maps” Seminar

12/2020 Talk: Anticipating the 2020 Census Data – A User Perspective; at National Conference of State Legislatures Census Data Updates Meeting

9/2020 Training: Redistricting Data and the Process of Map-Drawing; California Citizens Redistricting Commission hearing

8/2020 Training: Citizen Voting Age Population Data and Voting Rights Act Compliance; with Angelo Ancheta; California Citizens Redistricting Commission hearing

2019 – 2022 Design and direct Redistricting Access Sites throughout the State of CA (technical sites to provide in-person assistance and access to data and software.

2019 - 2020 Design and direct Census Access Points, UC Berkeley (set up staffed terminals in libraries and meeting areas on campus to increase student participation in 2020 Census)

11/2019 Presentations: Redistricting in CA and Statewide Database Methodology; at Tufts-MIT Fall Workshop on Census and Electoral Geospatial Data, Cambridge, MA

10/2019 Training: Preparing your Redistricting Database; with Mike Vatter; National Conference of State Legislatures Meeting, Columbus, OH

8/2019 Training: Redistricting Data & Processes to Aid the Evaluation of Applicants; California Citizens Redistricting Commission Applicant Review Panel

Fall 2019 Develop and Co-teach (with Jaime Clark) Graduate level course on Redistricting and Voting Rights at Mills College

7/2019 Presentations: Metric Geometry and Gerrymandering Group at Tufts University, Summer Redistricting and Voting Rights Institute

4/2019 Presentation: Reallocation of Inmate Data for Census 2020; California Citizens Redistricting Commission hearing

2018 – 2019 Direct the Census Bureau’s School District Review Program for the State of California

2018 – 2021 Lead the design and implementation of online and desktop redistricting software products to allow Californians to participate in the redistricting process

2018 - 2021 Lead the design and implementation of the first in the nation online tool to collect data on Communities of Interest. DrawmyCAcommunity is available in 18 languages.

12/2018 Design and Teach Certification Course: Census and Re/districting – An Overview of Criteria, Data & Processes; for California Association of Clerks and Elections Officials

3/2018 Presentation: Metric Geometry and Gerrymandering Group Conference, San Francisco; Redistricting and Voting Rights Implementation (with Denise Hulett)

2017 Design new research methodology (Special ACS Tabulation from Census Bureau) to identify precincts statewide for language assistance requirements for Limited English Proficiency voters; for CA Secretary of State.

2016 - Design and implement Incarcerated Person Data reallocation project for census 2020 redistricting database; consult on technical clean-up bill; provide expert testimony before legislative committees on Assembly Bill 2172 (Weber)

2016 - 2017 Direct the Census Bureau’s Block Boundary Suggestion Project for Census 2020 for the State of California; Coordinating outreach programs to local jurisdictions and assisting with geographic updates.

2013 Qualitative and quantitative studies of Mail Ballot Elections in Yolo County, CA (under CA Elections Code 4001 et al)

2013/2018 Design and implementation of statewide analysis of precincts with Limited English Proficiency voters (CA Elections Code 14201; for CA Secretary of State; similar analyses conducted in previous years)

- 02/2013 Guest Lecturer, Hastings College of the Law (Redistricting, Voting Rights Act and conducting Racially Polarized Voting Analyses)
- 05/2012 Speaker, California Studies Conference, Oakland, CA (Redistricting California: From the inside looking out)
- 03/2011 Designed and taught training on census data and redistricting for California Elections officials (CACEO)
- 02/2011 Speaker, Redistricting California Collaborative; San Francisco, CA (public participation in redistricting)
- 02/2011 Speaker at Redistricting Seminar for National Conference of State Legislatures, Washington DC (public participation, data and public input databases)
- 01/2011 Speaker/Trainer; Redistricting California Conference; Los Angeles, CA (redistricting data and how to participate)
- 2010 -2012 Lecturer, Speaker, Participant at multiple national voting rights act and redistricting seminars and convenings, including for the National Association of Latino Elected and Appointed Officials, the Chief Justice Earl Warren Institute on Race, Ethnicity and Diversity, and the Mexican American Legal Defense and Educational Fund
- 2010 -2011 Conceived, designed project, wrote grant, received funding (The James Irvine Foundation) and implemented statewide redistricting assistance sites that allowed the public access to software, technical assistance and infrastructure to participate in the California statewide redistricting process
- 2010 -2011 Taught dozens of seminars throughout California on Redistricting (Data, Criteria, VRA) and how to participate; and on the implementation of Prop 11
- 2010 Designed and taught multiple trainings for California Bureau of State Audits, on general redistricting data, and criteria; Trained Applicant Review Panel members on skills Commissioners need for Redistricting Commission (CRC); Trainings on California geographic, racial and ethnic diversity
- 06/2010 Faculty: Community Census and Redistricting Institute; Expert Preparation Program; Southern Coalition for Social Justice; Duke University
- 04/2010 Guest lecturer, University of California, School of Law; (Data use in Redistricting Litigation)
- 11/2009 Guest lecturer, Séminaire Frontières des villes, Paris 8 University, France (Implementation of California Proposition 11)
- 06/2009 Faculty at Redistricting Seminar for National Conference of State Legislatures San Francisco (Implementation of Redistricting)
- 08/2009 Guest lecturer; University of California, Berkeley, School of Law; Voting Rights Seminar (Implementation of Voting Rights Act Section 2)

Selected Consulting Projects with Q2 Data & Research, LLC

- 2023 Consultant to Asian Americans Advancing Justice/Asian Law Caucus and CA Common Cause to research alternate datasources and methodologies to identify small Limited English Proficient population groups
- 2022 Napa Valley Unified School District; Research technical specs and requirements and assist in the Implementation of School Facility Improvement District

- 2021 –2022 Principal redistricting consultant to various jurisdictions including
 Cities: City of Antioch; City of Oceanside; City of San Juan Capistrano; City of Murrieta; City of Oroville; City of Oakley; City of Escondido (Independent Redistricting Commission)
 Special and School Districts: Napa Valley Unified School District; Novato Sanitary District; Novato Fire District; Delta College District; Eden Health District; Turlock Irrigation District;
 Counties: County of Alameda; County of Stanislaus (only provided data and process trainings and support to Advisory Commission and staff); City and County of San Francisco (Redistricting Task Force)
- 2021 –2022 California Citizens Redistricting Commission (CRC) - Principal Consultant; construction of Assembly, Senate and Congressional Districts for the State of California; Responsible for all technical aspects of state redistricting;
- 2021 – 2022 Eden Health District; Districting of the Board of Directors Areas
- 2020 San Joaquin Delta College District; Districting of Board of Trustee Areas
- 2020 Napa Valley Unified School District; Redistricting of Board of Trustee Areas
- 2020 City of Oroville; Districting Consultant; Creation of first City Council districts
- 2019 Novato Sanitary District; Districting Consultant; Creation of first Election Divisions for Board of Directors
- 2019 Town of Windsor; Districting Consultant; Creation of first City Council districts
- 2018 City of Antioch; Districting Consultant; Creation of first City Council districts
- 2017 City of Oceanside; Districting Consultant; Creation of first City Council districts
- 2016 - 2018 Quantitative Election Cost study for 58 counties; Fiscal workshops; Consultant to the California Association of Clerks and Election Officials (CACEO)
- 2016 County of San Mateo; Study of the all-mail-ballot Election of 2016 (CA Elections Code Section 4001 et al)
- 2016 City of San Juan Capistrano; Districting consultant; Creation of first City Council districts
- 2014 - 2016 Qualitative and quantitative multi-year study of various elections topics with the California Association of Clerks and Election Officials (CACEO)
- 2015 City of Chula Vista; Consultant to the Districting Commission; Creation of first City Council districts
- 2014 The Women's Foundation of California; project to analyze and map poverty data for single-woman headed households for legislative districts
- 2013 City of Escondido; Consultant to the Independent Districting Commission; Creation of first City Council districts
- 2012 - Multiple local jurisdictions (CA): Conduct Racially Polarized Voting Analyses; Vulnerability Studies under the California Voting Rights Act (CVRA)
- 2012 City and County of San Francisco; Consultant to the Election Task Force for Redistricting to redraw the Supervisorial Districts
- 2011 - 2012 Gibson, Dunn & Crutcher, LLP; Redistricting Expert/Litigation Support
 Consultant to defend California Senate and Congressional Districts
- 2011 County of Stanislaus; Consultant to the Ad-Hoc Citizens Advisory Redistricting Commission; designed outreach strategy, educational materials for public participation and Community of Interest input approach. Conducted Community and Commission Trainings.
- 2011 -2012 California Citizens Redistricting Commission (CRC) - Principal Consultant; construction of Assembly, Senate and Congressional Districts for the State of California; Responsible for all technical aspects of state redistricting; also designed statewide outreach and public participation strategy for the CRC; developed outreach materials; designed public input database.

2010 California Bureau of State Audits; Designed and taught redistricting and data trainings for the initial 8 Commissioners;

2009 – 2011 California Bureau of State Audits; Consultant; trained Auditor Staff charged with developing regulations and implementing new redistricting initiative, assisted with outreach including co-hosting blogger web meeting with State Auditor

2008 - Various California and Federal Voting Rights Act - racially polarized voting analyses for Lawyers' Committee of Civil Rights under Law, Mexican American Legal Defense and Educational Fund, Hanson Bridgett, LLP; Local jurisdictions

2004-2006 United States Election Assistance Commission, Consultant in study of the implementation of the electronic transmission of voting materials, and voters covered by the Uniformed and Overseas Citizens Absentee Voting Act; including qualitative study of administrative procedures in 4 states; quantitative analysis of voter experiences, sample and large N survey design and implementation.

2004-2008 Consultant to The Election Center; Development and teaching of redistricting and voting rights course for Professional Certification Curriculum of California's Clerks and Registrars of Voters.

2002 City and County of San Francisco, Consultant to the Election Task Force for Redistricting to redraw the Supervisorial Districts

2001 Alameda-Contra Costa Transit District; Sub-Contractor/Redistricting Consultant to the Board of Directors to redraw the Ward Boundaries

2001 Peralta Community College District; Sub-Contractor/Redistricting Consultant to the District to redraw Community College Board of Trustee Areas

2001 City of San Diego; Consultant to the Redistricting Commission to redraw City Council Boundaries

2000 City of Modesto; Consultant to the Mayor's Ad-Hoc Committee on Term Limits and District Elections; Re-Design of a district-based Election System for the City of Modesto

1999/2000 City of Oakland, Analysis of 1990 Census Undercount by Census Block; Census Steering Committee

1999 Los Angeles Times; Creation of merged marketing and electoral database

1999 The San Francisco Examiner; Local Election Analysis

1998/99 City of Los Angeles, Establishment of a Department of Neighborhoods; Definition and Boundary Methodology of Neighborhoods for Formation of Councils

1998 Asian Pacific American Legal Foundation, Los Angeles; Survey and Exit Poll Design

1998 The Sacramento Bee; California Statewide Demographic Trend and Election Analysis

1997 National Coalition for Immigrant Rights; Naturalization and Registration Database Design and Implementation

1996 The Feminist Majority; Voter Registration and Demographic Analysis

1996 State of California, Office of the Legislative Analyst, Implementation of Public Policy through Department of Social Services

Selected Professional Activities/Memberships

2020-2022 Member, Advisory Data Council, Redistricting Data Hub

2019-2022 Member, Stakeholder Group, Redistricting Data Hub

2019 - Member, Census Quality Reinforcement (CQR) Task Force

2018 Expert Witness – California Legislature; Hearings on AB2172 (Weber); (Inmate Reallocation/Census Adjustment)

2018- Member, National Conference of State Legislatures Elections and Redistricting Standing Committee; Policy Working Group

2017- Member, National Conference of State Legislatures Elections and Redistricting Standing Committee

2013-2016 Task Force on Redistricting and Elections; National Conference of State Legislatures

2008- California State Liaison to the Bureau of the Census Voting Rights and Redistricting Data Program

2008-2012 California Secretary of State (Bowen), Help America Vote Act Implementation Advisory Committee

2007-2012 California Secretary of State (Bowen), VoteCal Advisory Committee

1998-2012 National Conference of State Legislatures (NCSL), Redistricting Taskforce

2005/2006 California Secretary of State (McPherson), Statewide Voter Registration Database Advisory Committee

2006 Expert Witness – California State Senate; Committee on Elections, Reapportionment and Constitutional Amendments

2005 Expert Witness – California State Assembly; Committee on Elections, Redistricting and Constitutional Amendments

2000/2001 Information Facilitator Working Group, Global Disaster Information Network

2000 Global Disaster Information Network, GDIN, U.S. Delegation to Turkey

2000 Latino Steering Committee, Census 2000, City of Oakland

2000 African American Steering Committee, Census 2000, City of Oakland

1999/2000 Census Complete Count Committees, Alameda County and Oakland

1998 California State Implementation Coordinator for Census 2000 Phase II

1998 - 2006 Bay Area Automated Mapping Association

1996 - 2004 American Political Science Association

1998 - 2000 American Association of Public Administration and Management

Academic Publications

“Making Maps: A Practitioner’s Perspective,” with Megan Gall and Fred McBride
 In *Political Geometry*, Moon Duchin, Ari Nieh, Olivia Walsh, Editors;
 Basel, 4/2022

“Redistricting Commissions” in *Redistricting Law 2020*; National Conference of State Legislatures, November, 2019

“Community of Interest Methodology and Public Testimony,” (with Bruce Cain)
 UC Irvine Law Review, Volume 3, August 2013.

“Adventures in Redistricting – A Look at the California Redistricting Commission,”
 Election Law Journal – Special Redistricting Volume, January 2013.

‘Implementation of Proposition 11, Part One: Setting the Rules, Soliciting Applications, and Forming a Commission,’ (with Bruce E. Cain and Bonnie E. Glaser) California Journal of Politics and Policy, 2013.

- “Election Results,” *Data for Democracy – Improving Elections through Metrics and Measurement*, The Pew Center on The States, Make Voting Work, December 2008
- “Administering the Overseas Vote,” (with Bruce E. Cain and Michael Murakami), *Public Administration Review*, Volume 68, Issue 5, September/October 2008
- “Sorting or Self-Sorting: Competition and Redistricting in California?” (with Bruce E. Cain and Iris Hui), *The New Political Geography of California*, Frederick Douzet, Thad Kousser and Kenneth Miller, eds., Berkeley: Public Policy Press, 2008.
- “Voting from Abroad: A Survey of UOCAVA Voters,” (with Bruce E. Cain and Bonnie E. Glaser), United States Election Assistance commission, <http://www.eac.gov>, March 2008
- “UOCAVA Voters and the Electronic Transmission of Voting Materials in Four States” (with Bonnie E. Glaser), United States Election Assistance Commission, <http://www.eac.gov>, October 2007
- “The Implications of Nesting in California Redistricting” (with Bruce E. Cain), University of California, Berkeley, Institute of Governmental Studies, August 2007
- “Explaining Voting System Performance: Do Technology, Training, and Poll Worker Characteristics Matter?” (with Bonnie E. Glaser, Iris Hui, and Bruce Cain), prepared for presentation at the 2007 Annual Meeting of the American Political Science Association, August 2007
- “The Attraction of Working from 6 am to 9:30 pm for a Fraction of Minimum Wage: Poll Workers and Their Motivation to Serve,” (with Bonnie E. Glaser), prepared for presentation at the 2007 Annual Meeting of the Midwest Political Science Association, April 2007
- “From Locomotive to Bullet Train: Street-Level Implementation of E-Voting,” (with Bonnie E. Glaser) prepared for presentation at the 2007 Annual Meeting of the Midwest Political Science Association, April 2007
- “Voting Rights Act Reinforcement: Navigating Between High and Low Expectations,” (with Bruce E. Cain), in *The Future of the Voting Rights Act*, David Epstein et al, editors, New York: Russell Sage, 2006.
- “Transparency and Redistricting,” (with Bruce E. Cain), University of California, Berkeley, Institute of Governmental Studies, http://igs.berkeley.edu/redistricting_research; November 2006
- “Competition and Redistricting in California: Lessons for Reform,” (with Bruce E. Cain and Iris Hui), University of California, Berkeley, Institute of Governmental Studies, http://igs.berkeley.edu/redistricting_research; February 2006
- “From Equality to Fairness: The Path of Political Reform since Baker v Carr” (with Bruce E. Cain and Michael P. McDonald), in *Party Lines: Competition, Partisanship and Congressional Redistricting*, Bruce E. Cain, Thomas Mann, eds., Washington, DC, Brookings Institution, 2005.

- "Pushbutton Gerrymanders? Have Computers changed Redistricting?" (with Micah Altman and Michael P. McDonald), in *Party Lines: Competition, Partisanship and Congressional Redistricting*, Bruce E. Cain, Thomas Mann, eds., Washington, DC, Brookings Institution, 2005.
- "From Crayons to Computers: The Evolution of Computer Use in Redistricting" (with Micah Altman and Michael P. McDonald) *Social Science Computer Review* 23(3), 2005
- "California: Low-Tech Solutions Meet High-Tech Possibilities," (with Bruce E. Cain) in *Election Reform*, Daniel J. Palazzolo and James W. Ceaser, eds., Lanham: Lexington Books, 2005
- "Rethinking Communities of Interest" in *Public Affairs Report*, University of California, Berkeley, Vol. 42, No. 3, Fall 2001
- "Census 2000 - this is your future" (with Bruce E. Cain) in *California County, Journal of the California State Association of Counties*, May/June 2000, Vol. 16, No. 3.
- "Affirmative Action as a Wedge Issue: Prop 209 and the 1996 Presidential Election" (with Bruce Cain; UC Los Angeles Civil Rights Project, 1998.
- "Nativism, Partisanship and Immigration; An Analysis of Prop. 187" (with Bruce Cain), in *Racial and Ethnic Politics in California*, Vol. II, Michael Preston, Bruce Cain, and Sandra Bass, Eds. Berkeley: IGS Press, 1998.
- "Race and Party Politics in the 1996 US Presidential Election" (with Bruce Cain), in *Racial and Ethnic Politics in California*, Vol. II, Michael Preston, Bruce Cain, and Sandra Bass, Eds. Berkeley: IGS Press, 1998.
- "On the Front Lines of Service Delivery: Are Workers Implementing Policy Reforms?" (With Marcia Meyers and Bonnie Glaser), *Journal of Policy Analysis and Management*, Vol. 17, No. 1, Winter 1998.
- "La question raciale et la politique des partis aux elections presidentielles de 1996" (with Bruce E. Cain), in *Herodote (Journal of Geo-Politics)*, Paris, France: La Decouverte, Spring 1997.
- "Institutional Paradoxes: Why Welfare Workers Can't Reform Welfare" (with Marcia K. Meyers, Bonnie Glaser, and Nara Dillon), February 1996 - Working Paper #7, UC DATA, Survey Research Center, University of California, Berkeley.
- "Beyond Quantitative Research: Exploring the Reality of Welfare Policy," (with Bonnie E. Glaser) prepared for presentation at the Annual Meeting of the National Association of Welfare Research and Statistics, July 1996.
- "Discretion, Devolution and Equity: Public Bureaucracies and Community Based Organizations in the Implementation of Welfare Reform," (with Bonnie E. Glaser and Marcia Meyers) prepared for presentation at the 1996 Annual Meeting of the American Political Science Association, 1996.

Professional Publications

- "Providing Election Services to People in Residential Care Facilities in California; Case Studies and a Pilot Project," (with Arshia Singh) The Information Technology and Innovation Foundation; Accessible Voting Technology Initiative; Working Paper; December 2013
- "Study of the March 5, 2013, All Mail Elections in Yolo County," (with Ken McCue) Report for Yolo County and the California Legislature; December 2013
- "Implementation of Proposition 11, Soliciting Applicants: The trials and tribulations of a unique outreach campaign," (with Bonnie E. Glaser) in draft September 2010.
- "Implementation of Proposition 11, Step One: Sorting out the rules, regulations, and logistics of forming a commission," (with Bonnie E. Glaser), February 2010.
- "Part II: Online Voter Registration Implementation Study," in Online Voter Registration (OLVR) Systems in Arizona and Washington: Evaluating Usage, Public Confidence And Implementation Processes, (with Bonnie E. Glaser) Pew Center on the States, April 1, 2010
- "Survey of Poll Workers in California – General Election November 7, 2006 Report for *Contra Costa County," (with Bonnie E. Glaser), May 1, 2007 [*equivalent report prepared for eight California Counties]
- "Voices from the Polling Place," recommendations prepared for the California Secretary of State's Office, (with Bonnie E. Glaser), April 1, 2007
- "The Why, How, What and When of Precinct Boards: Reactions from the Front Lines; A Survey of California Poll Workers in the Primary Election of 2006; Report for *Alameda County," (with Bonnie E. Glaser), September 1, 2006 [*equivalent report prepared for twenty-four California Counties]
- "The Why, How, What and When of Precinct Boards: Reactions from the Front Lines; A Survey of California Poll Workers in the Primary Election of 2006," prepared for the Annual Conference of California Association of Clerks and Election Officials (CACEO), (with Bonnie E. Glaser), July 25, 2006
- "Report to the Ad Hoc Committee on District Elections and Term Limits," City of Modesto, Evaluation of Voter Participation and Overview of Possible Changes to the Election System to Increase Participation, (with Bruce E. Cain), 2000
- "California Work Pays Demonstration Project, A Process Evaluation Phase IV: 1996" (with Barbara West Snow, Bonnie Glaser, and Christopher Jewell), UC DATA, Survey Research Center, 1997
- "California Work Pays Demonstration Project, A Process Evaluation Phase III: 1995" (with Barbara West Snow, Bonnie Glaser, and Christopher Jewell), UC DATA, Survey Research Center, 1997.

“California Work Pays Demonstration Project Process Evaluation: Communication of Work Incentives,” (with Bonnie E. Glaser) UC DATA Report, 1994.

Selected Academic Papers/Invited Talks

“A New Era or 1981 Revisited? California's Redistricting in 2001” presented at Lanier Public Policy Conference, University of Texas, Houston; December 2000

“Preparing for Redistricting in 2001 - Communities define their Interests” presented at American Political Science Association, Annual Meeting, Boston, 1998

"Wedge Issues and Polarization" 1997, presented at the Latino Civil Rights Crisis Research Conference of the Civil Rights Project, Harvard University; Brookings Institution, Washington D.C. 1997

“Race, Ethnicity, And Affirmative Action: The Impact of Proposition 209 on Presidential Voting” (with Bruce E. Cain and Kenneth McCue), [S.l.: s.n., 1997].

“Discretion, Devolution and Equity: Public Bureaucracies and Community Based Organizations in the Implementation of Welfare Reform” (with Marcia Meyers and Bonnie Glaser) 1996; presented at American Political Science Association Annual Meeting, San Francisco, August 1996

“Immigration, Social Cost and Fairness: The Determinants of California's Prop. 187” (with Bruce Cain and Ken McCue) 1996, presented at American Political Science Association Annual Meeting, San Francisco, 1996

“Bridging the Borders of Research; Qualitative Methodology in a Quantitative Environment” (with Bonnie Glaser) 1996; presented at National Association of Welfare Research and Statistics, Annual Conference, San Francisco, June 1996

"The Effect of Immigration on the Vote for Proposition 187" (with Bruce Cain) Quantitative Statistical Seminar Series, UC Berkeley, 1995

“Why Welfare Workers Can’t Reform Welfare” (with Marcia K. Meyers, Bonnie Glaser, and Nara Dillon) 1995; presented at American Political Science Association Annual Meeting 1995

Exhibit D

Karin Mac Donald
Director, Statewide Database
University of California
M126 Berkeley Law
Berkeley, CA 94720-7200

Principal Consultant
Q2 Data & Research, LLC
1225 Peralta St.
Oakland, CA 94607

November 29, 2023

Re: Statement of Interest to be considered as Special Master to the Court

Dear Judge Lasnik;

I am writing to declare my interest to serve as special master to the court in *Soto Palmer v. Hobbs*, to assist the court in evaluating remedial redistricting plans.

My expertise includes all facets of redistricting, including the assessment and implementation of districts that comply with the Federal Voting Rights Act (FVRA).

I've worked in the redistricting space from three different perspectives. One, as director of the redistricting database for the State of California, I became an expert on the data that are necessary to construct districts. Two, as a technical consultant, I gained applied knowledge on using these and other necessary data, to construct and evaluate districts. And three, as a political scientist at UC Berkeley, I have conducted academic studies and authored multiple papers on redistricting.

At the Statewide Database (SWDB), I have more than 28 years of experience in overseeing the building of a public and transparent redistricting database which allows for state and local districts to be constructed using the smallest geographic units, census blocks. The SWDB utilizes census data and geography and merges those with voter registration data, election returns and geography. California law requires the use of the resulting longitudinal dataset for construction of all statewide and most local districts. These data are used for voting rights assessments and compliance under the FVRA, as well as the implementation of by-district election systems under the California Voting Rights Act.

As a redistricting consultant to a variety of jurisdictions, I have gained hands-on experience in building electoral districts that comply with all criteria. I've served as the principal technical consultant for jurisdictions as large as the State of California (Independent Redistricting Commissions of 2011 and 2021) and as small as a city with a total population of fewer than 35,000. California is a highly diverse state that was partially covered under Section 5 of the FVRA when it was still in effect and continues to have complicated FVRA challenges and opportunities. In virtually every districting and redistricting in

California, areas are assessed under the FVRA and frequently Section 2 compliant districts must be drawn. Often, there are data challenges and methodological choices must be made to ensure that the best possible approaches are employed to assess the potential districts. I have over 23 years of experience with the FVRA, including evaluating racially polarized voting analyses, collecting data to assess Senate factors, and implementing districts.

California's approach to redistricting encourages public participation and submissions of maps covering partial and entire jurisdictions are very common. As a redistricting consultant, I have evaluated hundreds of submissions to assess their adherence to the redistricting criteria, and on whether or how they can be implemented into existing plans.

Finally, I have conducted independent studies on redistricting ranging from criteria interactions (what does 'competition' as a criterion do to a potential FVRA seat?) to how members of the public define communities of interest. I've authored and co-authored academic articles on redistricting, and I frequently teach about criteria, methods and data issues.

My professional life, as Director of the Statewide Database, as an academic and a consultant, has been defined by a mission to be of service to the public. I am strictly non-partisan and have been able to successfully work with people from all backgrounds. If my expertise can be of assistance for this project then I would be happy to work with you. I appreciate your consideration.

Best regards,

A handwritten signature in blue ink, appearing to read "Karin Mac Donald". The signature is fluid and cursive, with a large initial "K" and "M".

Karin Mac Donald

Exhibit E

Resume of Douglas Johnson, Ph.D.

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

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

Employment

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

Education

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

Academic Honors

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

Publications and Articles

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

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

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

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

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

Los Angeles Times Opinion Articles:
“A neighbor’s help on redistricting” June 24, 2007.
“A Trojan horse primary for the GOP” February 25, 2007.
“Where a porn palace stood” (article on redevelopment), July 30, 2006.

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

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

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

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

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

Douglas M. Johnson, Ph.D.

Independent and Advisory Commission Redistricting Projects

City of Menlo Park Advisory Districting Commission, lead technical consultant, 2018
Arizona Independent Redistricting Commission, lead technical consultant, 2001-2008
San Diego City Council Independent Redistricting Commission, lead technical consultant, 2011
City of Surprise Advisory Commission on Redistricting, 2011
Pasadena City Council Advisory Commission on Redistricting, co-lead technical consultant, 2011
Pasadena Unified School Board Advisory Commission on Redistricting, co-lead technical consultant, 2011
City of Modesto Independent Redistricting Commission, lead technical consultant, 2011
City of Modesto Independent Districting Commission, lead technical consultant, 2008

Speaker or Panelist

League of Women Voters of Burbank and Glendale, Keynote Speaker, "Town Hall meeting on SB415" (The California Voter Participation Rights Act), May 8, 2018.
California League of Cities, City Manager Department Annual Conference, Panelist, "CVRA and the Profound Impact on Local Governance," February 15, 2019.
California League of Cities, Mayors and Councilmembers Executive Forum, Moderator, "The California Voting Rights Act and the District-Drawing Process," June 29, 2018.
California League of Cities, City Attorney Department, panelist, "The California Voting Rights Act: Recent Legislation & Litigation Outcomes," May 3, 2018.
California League of Cities, City Clerk Department, Co-Presenter, "California Voting Rights Act – Transitioning From At-Large To By-District Elections: A Practical Guide For City Clerks," April 19, 2018.
California School Board Association Annual Education Conference panelist: "15 Years with the California Voting Rights Act: Lessons Learned and Challenges Ahead." December 1, 2017.
University of California's National Public Service Law Conference: Civil Rights in the 21st Century: Moderator, "Voting Rights 101." September 23, 2017.
City Clerks Association of California Annual Conference panelist: "California Voting Rights Act: Putting the 2016 Legislation into Practice." April 13, 2017.
California School Board Association Annual Education Conference panelist: "The California Voting Rights Act: What Board Members Must Know." December 4, 2015.
Associated Cities of California – Orange County, Keynote Speaker, Newly Elected Officials' Reception and Dinner, "The California Voting Rights Act," January 29, 2015.
California League of Cities, City Manager Department, 2015 Department Meeting: "Opportunity to Engage Residents: The California Voting Rights Act." January 29, 2015.
California League of Cities, City Clerk Department, 2014 Annual Meeting: "Whose Line Is It Anyway: Making the transition from at-large to by-district elections." September 3, 2014.
National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2007 Spring Forum, "The Arizona Independent Redistricting Commissions' experiences with the first-ever independent redistricting."
National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2008 Spring Forum, "Communities of Interest In Redistricting: A Practical Guide."
National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2009 Fall Forum, "The Key to Successful Redistricting."
National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2010 Spring Forum, "Communities of Interest in Redistricting: A key to drawing 2011 plans (and for their defense)."
National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2011 Winter Forum, "Citizen Voting Age Data from a line-drawer's viewpoint."
Luncheon Keynote Speaker, Santa Barbara's Channel Cities Club, "California's next experiment: independent, public redistricting," January 18, 2011.
Annual Conference, Arizona League of Cities and Towns, Presenter at "Redistricting Law and the Voting Rights Act: What It Means for Your City or Town in 2011," August 25, 2010.
Redistricting, The 2010 Census, and Your Budget, Sponsored by the Rose Institute of State and Local Government, California League of Cities, October 15, 2009.

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Speaker or Panelist (continued)

- Arizona Election Law 2010 Continuing Legal Education Conference, "Communities of interest and technology in redistricting," sponsored by the Arizona State Bar Association, March 2010.
- California's New Independent Redistricting Commission, sponsored by the Irvine Foundation and the California Redistricting Collaborative, December 15, 2009.
- Tribal Association of Sovereign Indian Nations (TASIN) Legislative Day 2009, "The 2010 Census and 2011 Redistricting in California," December 2, 2009.
- California School Board Association, "Litigation Issues and the California Voting Rights Act," December 4, 2009.
- California Latino School Boards Association, "Introduction to the California Voting Rights Act," August 20, 2009.
- Building a National Reform Movement, Salt Lake City, Utah, 2006, conference on redistricting .reform hosted by the League of Women Voters, Campaign Legal Center, and The Council for Excellence in Government.
- Texas Tech University, "A Symposium on Redistricting," May, 2006.
- California League of Cities, "Introduction to the California Voting Rights Act."
- Voices of Reform, a project of the Commonwealth Club of San Francisco: multiple forums on redistricting and / or term limits, 2006 – 2007.
- Classroom speaker at Bellflower High School, Pepperdine University, the University of La Verne, Pomona College and Claremont McKenna College.

Charter and/or Ballot Language Consultant

- Castaic Lake Water Agency and Newhall County Water District consultant advising on process, rules and legislation language for merger of the two districts including changing from at-large to by-district election system. (2015-2016)
- City of Corona: consultant for City Council on a potential city charter and a move to by-district elections. (2015-2016)
- City of El Cajon: consulted on writing of charter revision and public education campaign for ballot measure changing from at-large to by-district City Council elections. (2016)
- City of Goleta: consulted on development of ordinances and ballot language asking voters what election system they preferred. (2003 – 2004)
- City of Menifee: advised commission considering language on by-district elections. (2009 – 2010)
- City of Modesto: advised commission that successfully developed a city charter change moving Modesto from at-large to by-district elections and created an independent redistricting commission. (2006 – 2008)
- City of Pasadena (on behalf of Pasadena Unified School District): advised commission that successfully developed a city charter change moving Pasadena Unified from at-large to by-district elections and created a redistricting commission. (2011 – 2012)

Litigation Experience

- Expert witness declaration for the City of Redondo Beach, California, in *City of Redondo Beach vs State of California*, Los Angeles County Superior Court Case No. BS172218 litigation regarding the California Voter Participation Act (currently pending).
- Expert witness declaration for West Contra Costa Unified School District in *Ruiz-Lozito vs West Contra Costa Unified School District* litigation under the California Voting Rights Act, Contra Costa Superior Court Case Number C18-00570 (currently pending).
- Expert witness declaration, deposition and testimony for Kern County, California, in *Luna v County of Kern* litigation under the Federal Voting Rights Act.
- Expert witness declaration and testimony for North Carolina in *Covington v State of North Carolina* litigation under the Federal Voting Rights Act.
- Expert witness declaration for City of Fullerton in *Jamarillo v City of Fullerton* litigation under the California Voting Rights Act.

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Litigation Experience (continued)

- Expert witness declaration for City of Whittier in *Diego v City of Whittier* litigation under the California Voting Rights Act.
- Expert witness declaration and deposition for plaintiff in *Harris vs Arizona Independent Redistricting Commission* litigation.
- Expert witness declaration and deposition for Santa Clarita Community College District in *Solis v Santa Clarita Community College District* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Highland in *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Palmdale in *Jauregui et al vs City of Palmdale* and *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Testified as 30(b)(6) “Most Knowledgeable” witness for Arizona Independent Redistricting Commission in *Arizona Minority Coalition v Arizona Independent Redistricting Commission*, including seven days of direct testimony and cross-examination in the state court case. Also testified in the related federal court case.
- Consulting expert for the following jurisdictions on their California Voting Rights Act-related cases, including preparing analysis and assisting with witness and attorney preparation: Cities of Anaheim; Compton, Modesto, Poway, Santa Clara, Santa Clarita, and Whittier; Santa Clarita Community College District; and Tulare Health Care District.

Voting Rights Act and Racial Bloc Voting Analysis

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

- Nielsen, Merksamer, Parrinello, Gross & Leoni: Compiled and analyzed data for over 120 different jurisdictions facing voting rights litigation;
- Lozano, Smith: Performed analysis of racial bloc voting in 4 separate jurisdictions.
- Richards, Watson & Gerson: Compiled and analyzed potential liability under California Voting Rights Act and California Voter Participation Rights Act for about a dozen cities.
- Atkinson, Andelson, Loya, Ruud & Romo: Performed/performing on analysis of racial bloc voting in dozens of jurisdictions and California Voter Participation Rights Act liability analysis for multiple school districts.
- Dooley, Herr & Peltzer: Performed racial bloc voting analysis of 7 elections in 4 different election years. Also advised attorneys on rebuttal of plaintiff's racial bloc voting analysis.

Districting / Redistricting Clients

(* Indicates advisory or independent commission. Jurisdictions in California unless otherwise noted.)

States	Cities	
State of Arizona 2001	Anaheim	Cathedral City
Independent Redistricting Commission *	Apple Valley	Cathedral City
	Arcadia	Ceres
Florida State Senate 2001	Atwater City	Chino
	Banning	Chino Hills
	Barstow	Chino Hills
	Bellflower	Citrus Heights
	Big Bear Lake	Claremont
	Buckeye	Colton
	Buena Park	Compton
	Camarillo	Corona
	Campbell	Dana Point
	Carlsbad	Dixon
	Carpinteria	Duarte
		Eastvale

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Cities (Cont.)

El Cajon
El Cajon
Encinitas
Escondido
Exeter
Firebaugh
Fontana
Fowler
Fullerton
Glendale (AZ)
Glendale (CA)
Glendora
Half Moon Bay
Hemet
Hesperia
Hesperia
Highland
Imperial Beach
Indio
Jurupa Valley
King City
Kingsburg City
La Mirada
La Mirada
Lake Elsinore
Lake Forest
Lemoore
Lodi
Lompoc
Los Alamitos City
Los Banos
Madera
Martinez City
Menifee
Menlo Park
Merced
Mesa (AZ)
Modesto
Monrovia
Monterey Park
Moorpark
Moreno Valley
Morgan Hill
Murietta
Oakland
Ojai
Oxnard City
Pacifica

Palm Springs
Palmdale
Parlier
Pasadena
Paso Robles
Patterson
Peoria (AZ)
Placentia
Porterville
Poway City
Rancho Cucamonga
Redlands
Redlands
Redwood City
Reedley
Riverbank
San Clemente
San Diego
San Marcos
San Marcos
San Rafael
Sanger
Santa Barbara
Santa Clarita
Santa Maria
Santa Rosa
Santee City
Simi Valley
Solana Beach
South Pasadena
South SF
Stanton
Surprise
Tehachapi
Temecula
Torrance
Tulare
Turlock
Twentynine Palms
Vallejo
Ventura
Victorville
Victorville
Visalia
Vista
Wasco
West Covina
Whittier
Wildomar

Yucaipa
Yucca Valley

Community College Districts

Antelope Valley
Barstow
Coast
Cuesta
Glendale
Grossmont-Cuyamaca
MiraCosta
Palomar
Rancho Santiago
San Diego
Santa Clarita
Sierra
Southwestern

Special Districts

Alta Irrigation
Castaic / Newhall Water
Castaic Lake Water Agency
Chino Fire
Desert Healthcare
Desert Water Agency
Fallbrook Regional
Healthcare
Fresno Irrigation
Grossmont Healthcare
Imperial Irrigation District
Joshua Basin Water
Jurupa Community Service
District
Kings River Conservation
District
Lake Arrowhead CSD
Leucadia Wastewater
Mojave Water Agency
Monterey Airport
Palmdale Water
Palomar Healthcare
Rowland Water
San Bernardino Water
Santa Clara Valley Water

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Special Districts

(cont.)

Santa Maria Airport
Tri-City Health
Tulare Health Care District
Upper San Gabriel Valley
West Valley Water
Western Municipal Water
Westside Community Health
Care District
Winton Water

School Districts

Alpine Union
Alpine Union Elementary
Alta Vista
Bakersfield City Schools
Barstow Unified
Bonsall Union Elementary
Borrego Springs Unified
Buena Park Elementary
Burton Elementary
Cajon Valley Union
Cajon Valley Union
Cajon Valley Union
Elementary
Calistoga Joint Unified
Capistrano Unified
Capistrano Unified
Cardiff Elementary
Carlsbad Unified
Carlsbad Unified
Caruthers
Castaic Elem
Castaic Elementary
Cayucas
Centinela Valley
Central Unified
Central Union High
Centralia Elementary
Chula Vista Elementary
Claremont Unified
Clay Elementary
Clovis Unified
Coalinga-Huron
Coronado Unified
Covina Valley
Cypress Elem

Dehesa Elementary
Del Mar Union Elementary
Dinuba Unified
Eastern Sierra Unified
Eastside Union Elementary
El Monte Union High
Encinitas Union Elementary
Escalon Unified
Escondido Union
Elementary
Escondido Union High
Exeter Elementary
Exeter High
Exeter Unified
Fallbrook Elementary
Fallbrook High
Fallbrook Union Elementary
Fallbrook Union High
Fillmore Unified
Firebaugh-Las Deltas
Fresno Unified
Fullerton Union High
Glendale
Glendale Unified
Golden Plains
Goleta Unified
Greenfield
Grossmont Union High
Hawthorn Elementary
Hughson Unified
Inglewood Unified
Irvine Unified
Jamul-Dulzura Union
Julian Union Elementary
Julian Union High
Kerman Unified
Kern High
Keyes Union
Kings Canyon Unified
Kings River
Kingsburg Elementary
Kingsburg High
La Mesa Spring Valley
La Mesa-Spring Valley
Lake Elsinore
Lakeside Union Elementary
Lakeside Union School
Lancaster Elementary
Lawndale Elem

Lawndale Elementary
Lemon Grove Elementary
Lindsay Unified
Los Alamitos Unified
Lowell Joint Union
Lucia Mar Unified
Madera Unified
Magnolia Elementary
Merced City Elementary
Merced Union High School
District
Modesto City Schools
Modesto City Schools
Modoc Unified
Monson Soltana
Morgan Hill Unified
Morongo Unified
Mountain Empire
Napa Valley Unified
National Elementary
New Jerusalem
Newhall Elementary
Newman Crows Landing
Oak Grove Elementary
Oceanside Unified
Oceanside Unified
Pacific Union
Palo Verde
Panama Buena Vista
Pasadena Unified
Perris Union High
Pixley Union
Placentia Yorba Linda
Pleasant View
Pomona Unified
Porterville Unified
Poway Unified
Poway USD
Ramona Unified
Ramona Unified
Rancho Santa Fe Elementary
Redlands Unified
Redwood City Schools
Richland School District
Riverbank
Riverdale Unified
Rosemead Unified
Salida Union
San Benito High

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School Districts (cont.)

San Dieguito
San Dieguito Union High
San Marcos Unified
San Pasqual Union
Elementary
San Ramon Unified
San Ysidro Elementary
Santa Cruz City Schools
Santa Monica Unified
Santee Elementary
Selma Unified
Sequoia Union High
Sequoia Union High
Simi Valley Unified
Solana Beach Elementary

South Bay Union
South Pasadena Unified
South SF Unified
Spencer Valley Elementary
Strathmore Elementary
Sundale Union Elementary
Sweetwater Union High
Tulare City Elementary
Tulare City High
Tulelake Basin
Turlock Unified
Tustin Unified
Twin Rivers Unified
Vacaville Unified
Vallecitos Elementary
Valley Center Pauma Unified
Victor School District

Visalia Unified
Vista Unified
Walnut Valley Water
Warner Unified
Washington Unified
Washington Union
Waterford Union
West Contra Costa USD
West Fresno Elementary
Westminster Elem
Whittier City Schools
Whittier Union High
Whittier Union High
Woodlake Union

Exhibit F



National Demographics Corporation

November 30, 2023

Dear Judge Lasnik,

I am writing to share my interest and availability to serve as a redistricting special master for the Court in the matter of *Soto Palmer v. Hobbs*. I believe I (and my team) offer the court a unique level of service:

- A Ph.D. in Political Science, I wrote my dissertation on the promises and challenges facing independent redistricting commissions, including a case study approach to the early city and state independent redistricting commissions and their struggles to resist partisan efforts to undermine their independence.
- As an academic researcher, my writings and insights are widely quoted in papers, newspapers, and television coverage of districting and redistricting.
- As President of one of, if not the most, prolific redistricting demographic firms in the country I have personally drawn or supervised districting and redistricting plans in over 500 projects at all levels of government from statewide independent redistricting commissions (Arizona in 2001 and 2021) to counties, cities, large and small school districts, and a wide variety of special districts ranging from fire protection districts to airport districts to health care districts.
- In *Covington vs North Carolina*, US Fourth District Court Judge James A Wynn said about me, “Here’s a great expert. . . . today you bring him in for what sounds like good information, very smart man up here,” – despite ruling against the side that brought me in as an expert.

My firm pioneered tools for public participation in redistricting way back in 1990, and we have constantly updated and innovated both the tools themselves and the efficient means of presenting and evaluating public map submissions. We regularly receive dozens of public map submissions even in small and medium-size city districting and redistricting projects, and our goal in every project is to generate sufficient public engagement, education and empowerment that jurisdictions adopt a resident-drawn map.

At NDC, we view our role as the experts in the data, process, criteria and tools of redistricting, but our role is to empower local decision-making in each client jurisdiction, not to dictate what the “best” map should be in our outside opinion. We are there to implement local rules and decision-making, and to identify and respect local communities, not to dictate to those who know the local communities best.

The California Voting Rights Act of 2001 led to an increase in the number of California cities using by-district City Council elections from 29 cities in 2002 to 230 today. Over 85% of those transitioning cities hired my firm, NDC, as their districting demographer due to our experience, how we provide and using an unprecedented amount of socio-economic data in every project (far beyond the simple ethnic, racial and voting data the overwhelming majority of redistricting demographers use), and for our non-partisan focus on employing our skills, experience and tools to provide the map the local laws and communities consider best, not what our personal preferences might predetermine as best.

More details are in the attached resume. If selected, I would be aided by NDC Vice-President Dr. Justin Levitt. He is a 20-year veteran of redistricting and has considerable knowledge of Washington State communities and demographics to assist me with this project, as he grew up in the Seattle area.

Thank you for your consideration,

Douglas Johnson, President