The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, et. al.,	Case No.: 3:22-cv-05035-RSL
Plaintiffs,	Judge: Robert S. Lasnik
v.	**PLAINTIFFS' BRIEF IN**
STEVEN HOBBS, et. al.,	**SUPPORT OF REMEDIAL**
Defendants, and	**PROPOSALS**
JOSE TREVINO, ISMAEL CAMPOS, and ALEX YBARRA,	
Intervenor-Defendants.	

I. INTRODUCTION

On October 4, 2023, this Court ordered the parties to "meet and confer with the goal of reaching a consensus on a legislative district map" that would remedy the dilution of Latino voting strength under Section 2 of the Voting Rights Act (VRA) arising from the configuration of LD 15. Order at 2, Dkt. #230. The parties met on November 16, 2023, but failed to reach a consensus on a remedial map. Plaintiffs now respectfully submit five proposed maps that remedy the VRA violation for Latino voters in the Yakima Valley region and provide all voters in the region equal

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electoral opportunity. Each proposal is a complete and comprehensive remedy to Plaintiffs' Section 2 harms that aligns with both traditional redistricting principles and federal law.

II. LEGAL STANDARD

To remedy the Section 2 violation in the Yakima Valley region, the Court must order the adoption of a remedial plan in which Latino voters possess "real electoral opportunity." *See*, *e.g.*, *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 428 (2006). The Court should "exercise its traditional equitable powers to fashion the relief so that it *completely* remedies the prior dilution of minority voting strength and *fully* provides equal opportunity for minority citizens to participate and to elect candidates of their choice." *Ketchum v. Byrne*, 740 F.2d 1398, 1412 (7th Cir. 1984) (quoting S. Rep. No. 97-417, at 31) (emphasis added); *see also Gomez v. City of Watsonville,* 863 F.2d 1407, 1419 (9th Cir. 1988) ("the district court has broad equitable powers to fashion relief which will remedy the Section 2 violation completely"); *McGhee v. Granville Cnty., N.C.*, 860 F.2d 110, 118 (4th Cir. 1988) ("If a vote dilution violation is established, the appropriate remedy is to restructure the districting system to eradicate, to the maximum extent possible *by that means*, the dilution proximately caused by that system.") (emphasis in original); *U.S. v. Dallas Cnty. Comm'n*, 850 F.2d 1433, 1438 (11th Cir. 1988).

The Court ought to conduct a fact-based analysis of the district's demographics, racial polarization, and past electoral performance to ensure the remedial district configuration will, in fact, provide the minority community with an equal opportunity to elect candidates of its choice. See *League of United Latin Am. Citizens*, 548 U.S. at 428–29 (considering whether a district was "an effective opportunity district" by assessing a district's Latino citizen voting age population and past electoral performance); *Milligan v. Merrill*, 582 F. Supp. 3d 924, 936 (N.D. Ala. 2022), *aff'd sub nom. Allen v. Milligan*, 599 U.S. 1 (2023) (ordering that a remedial plan create "either an

additional majority-Black congressional district, or an additional district in which Black voters otherwise have an opportunity to elect a representative of their choice."). Plaintiffs demonstrated that it is possible to draw a district with over 50% Latino Citizen Voting Age Population ("CVAP") to prove *liability*, but once a violation has been shown, a remedial map imposed by a Court need not include "majority-minority" districts to achieve Section 2 compliance. Instead, as noted above, the remedial inquiry turns on a functional analysis of a district's electoral performance for Latino voters, not an arbitrary demographic threshold. *See Bartlett v. Strickland*, 556 U.S. 1, 23 (2009) (stating that "§ 2 allows States to choose their own method of complying with the Voting Rights Act, and we have said that may include drawing crossover districts") (internal citations omitted); *Cooper v. Harris*, 137 S. Ct. 1455, 1472 (2017).

When adopting a remedial district, this Court must consider traditional redistricting principles as well as the policies underlying the current redistricting plan, but those considerations ultimately must subordinate to compliance with the Constitution and the Voting Rights Act. *See Arizona v. Inter Tribal Council of Ariz. Inc*., 133 S. Ct. 2247, 2256 (2013) ("[Federal legislation] so far as it extends and conflicts with the regulations of the State, necessarily supersedes them." (citation omitted)); *Large v. Fremont County*, 670 F.3d 1133, 1145 (10th Cir. 2012) ("In remedial situations under Section 2 where state laws are necessarily abrogated, the Supremacy Clause appropriately works to suspend those laws because they are an unavoidable obstacle to the vindication of the federal right." (emphasis in original)).

III. PLAINTIFFS' REMEDIAL PROPOSALS

Plaintiffs present five proposed remedial plans, each of which comply with traditional redistricting principles including population equality, compactness, contiguity, respect for political subdivisions, and preservation of communities of interest. Ex. 1, Oskooii Decl. at 4-11; RCW

29A.76.010(4). Each of the remedial proposals was drafted by Plaintiffs' remedial mapping expert, Dr. Kassra Oskooii, without consideration of the racial or partisan composition of the districts. *Id.* at 4. Each plan would remedy the dilution of Latino voting strength in the Yakima Valley region by creating a district in which Latino voters have an equal opportunity to elect candidates of their choice to the state legislature despite high degrees of racially polarized voting. Ex. 2, Collingwood Decl. at 1. Consistent with the Court's instruction to "keep[] in mind the social, economic, and historical conditions discussed in the Memorandum of Decision," Order at 2, Dkt. #230, Plaintiffs' proposed remedial districts are each labeled as LD 14 wherein elections for state senate align with the higher turnout gubernatorial and presidential elections. In doing so, none of Plaintiffs' proposed plans pair any Senators who would be up for election in the off-year of 2026. Because Latino voter turnout is less depressed in presidential elections than in off-year elections, Mem. of Decision at 17, Dkt. #218, the creation of the remedial district as LD 14 will significantly contribute to ensuring the region's Latinos will have "real electoral opportunity" as required by Section 2. *League of United Latin Am. Citizens*, 548 U.S. at 428.

While any of Plaintiffs' proposed plans would remedy the VRA violation, Plaintiffs' preference is for the Court to adopt a proposed remedial district configuration which unites populations in Yakima, Pasco, and various smaller population centers bridging them, which "form a community of interest based on more than just race." Mem. of Decision at 10, Dkt. #218.

Plaintiffs' Remedial Proposal 1

As Dr. Oskoii explains in his attached declaration, Remedial Proposal 1 contains a configuration of LD 14 that unites the community of interest in the Yakima Valley region, including both the East Yakima and Pasco community centers and smaller communities in the Lower Yakima Valley like Wapato, Toppenish, Sunnyside, and Grandview. Plaintiffs' Remedial

Proposal 1, like all of Plaintiffs' remedial proposals, keeps the Yakama Nation Reservation intact in one legislative district. LD 14 in Plaintiffs' Remedial Proposal 1 also contains some of the Yakama Nation trust lands.

Dr. Collingwood separately assessed whether Plaintiffs' Remedial Proposal 1 would perform to allow Latino voters an equal opportunity to elect their candidates of choice. LD 14 in Remedial Proposal 1 has a Latino CVAP of 51.65%. Ex. 2, Collingwood Decl. at 3. Importantly, Remedial Proposal 1 provides Latino voters in the Yakima Valley region with an equal opportunity to elect candidates of choice to the state legislature across a range of electoral conditions. The performance analysis conducted by Dr. Collingwood shows that in nine of the nine elections considered, the Latino-preferred candidate would win in LD14 in Remedial Proposal 1. Ex. 2, Collingwood Decl. at 4.

Plaintiffs' Remedial Proposal 2

LD 14 in Remedial Proposal 2 has an identical configuration to LD 14 in Plaintiffs' Remedial Proposal 1 but offers an alternative configuration of the legislative districts *surrounding* LD 14.

Plaintiffs' Remedial Proposal 3

Plaintiffs' Remedial Proposal 3, like 1 and 2, contains a configuration of LD 14 which joins communities of interest in the Yakima Valley region, including both East Yakima and Pasco community centers as well as communities in the Lower Yakima Valley like Wapato, Toppenish, Sunnyside, and Grandview. Plaintiffs' Remedial Proposal 3 also combines the Yakama Nation Reservation and all of the Yakama Nation trust lands and fishing villages in LD 14.

Dr. Collingwood separately assessed whether Plaintiffs' Remedial Proposal 3 would perform to allow Latino voters an equal opportunity to elect their candidates of choice. LD 14 in

Remedial Proposal 3 has a Latino CVAP of 50.14%. Ex. 2, Collingwood Decl. at 3. Remedial Proposal 3 provides Latino voters in the Yakima Valley region with an equal opportunity to elect candidates of their choice to the state legislature across a range of electoral conditions. The performance analysis conducted by Dr. Collingwood shows that in nine of the nine elections considered, the Latino-preferred candidate would win in LD 14 in Remedial Proposal 3. Ex. 2, Collingwood Decl. at 4.

Plaintiffs' Remedial Proposal 4

LD 14 in Remedial Proposal 4 has an identical configuration to LD 14 in Plaintiffs' Remedial Proposal 3 but offers an alternative configuration of the legislative districts *surrounding* LD 14.

Plaintiffs' Remedial Proposal 5

Remedial Proposal 5 contains a configuration of LD 14 which does not include Pasco in LD 14. Remedial Proposal 5 includes all of the Yakama Nation Reservation in LD 14 but not the off-reservation trust lands or fishing villages. While Remedial Proposal 5 is not preferred by Plaintiffs, it would nonetheless remedy the Section 2 violation by creating an effective opportunity district for Latino voters, should this Court choose to do so without uniting the full Yakima Valley region community of interest, including both Yakima and Pasco Latinos, in one legislative district.

Dr. Collingwood separately assessed whether Plaintiffs' Remedial Proposal 5 would perform to allow Latino voters an equal opportunity to elect their candidates of choice. LD 14 in Remedial Proposal 5 has a Latino CVAP of 47%. Ex. 2, Collingwood Decl. at 3. Remedial Proposal 5 provides Latino voters in the Yakima Valley region with an equal opportunity to elect candidates of their choice to the state legislature across a range of electoral conditions. The performance analysis conducted by Dr. Collingwood shows that in nine of the nine elections

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1   considered, the Latino-preferred candidate would win in LD 14 in Remedial Proposal 5. Ex. 2,

2   Collingwood Decl. at 4.

3   **IV. CONCLUSION**

4   Plaintiffs respectfully urge this Court to adopt one of Plaintiffs' five proposed remedial

5   plans, which fully and effectively remedy the Section 2 violation in the region, with a preference

6   for Remedial Plans 1-4.

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9   Dated: December 1, 2023   Respectfully submitted,

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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 E. Harless
Annabelle E. Harless
Counsel for Plaintiffs

EXHIBIT 1
December 1, 2023 Declaration of Dr. Oskooii

Expert Report Submitted on Behalf of Plaintiffs

in *Soto Palmer, et al. v. Hobbs, et al.*

Kassra AR Oskooii, Ph.D.

University of Delaware

December 1, 2023

A. **Background and Qualifications**

1.   I, Kassra AR Oskooii, am over 18 years of age and am competent to testify.

2.   I am a tenured, Associate Professor and Provost Teaching Fellow in the department of Political Science and International Relations at the University of Delaware ("UD"), having joined the faculty in 2016 as an Assistant Professor. I am also an affiliated faculty member at UD's Data Science Institute, Master of Science in Data Science, Center for Political Communication, and Center for the Study of Diversity. My research and teaching focuses on American political behavior, political methodology, political psychology, political representation, voting rights, and redistricting. My research has appeared in numerous leading peer-reviewed, social science journals, including *Sociological Methods and Research*, *Political Behavior*, *Public Opinion Quarterly*, *Political Psychology*, *British Journal of Political Science*, *Electoral Studies*, *Perspectives on Politics*, *Urban Affairs Review*, *State Politics and Policy Quarterly*, and *Journal of Public Policy*.

3.   I received my Ph.D. in Political Science, specializing in American politics, minority and race politics, and political methodology, from the University of Washington in Seattle, Washington in 2016. Prior to that, I received my Master's Degree in Political Science at the University of Washington and received a political methodology field certificate from the Center for Statistics & the Social Sciences in 2013. I received my Bachelor of Arts in Political Science in 2008 at the University of Washington, with minors in Human Rights and Law, Societies, and Justice.

4.   Of relevance to this report, I have taught courses at the University of Delaware related to demographic data collection and analysis, evaluation of redistricting plans for compliance with the Voting Rights Act of 1965 ("VRA"), and the drawing of redistricting plans using traditional redistricting criteria. Relatedly, I have been retained as an expert in redistricting and voting rights cases, including *Dickinson Bay Area Branch NAACP v. Galveston County, Texas*, No. 3:22-cv-117-JVB (S.D. Tex. 2023) (deposed and testified), *Baltimore County Branch of the NAACP v. Baltimore County, Maryland*, No. 1:21-cv-03232-LKG (D. Md. 2022), *Common Cause Florida v. Lee*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022), *Common Cause Florida v. Byrd*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) (deposed), *Reyes v. Chilton*, No. 4:21-cv-05075-MKD (E.D. Wash. 2021) (deposed), *Finn et al. v. Cobb County Board of Elections and Registration*, No. 1:22-cv-02300-ELR (N.D. Ga. 2022), *Caroline County Branch of the NAACP v. Town of Federalsburg*, Civ. Action No. 23-SAG-00484 (D. Md. 2023), and *Coca v. City of Dodge City, et al.*, Case No. 6:22-cv-01274 (D. Kan. 2022) (deposed).

5.   As an expert consultant, I have also advised the State of Maryland on its 2021 Congressional and Legislative redistricting plans. I have also examined and redrawn the 2022 school board district boundaries of the Roswell Independent School District in the state of New Mexico. More information about my qualifications and expert witness and consulting background can be found on my Curriculum Vitae, appended to this declaration as **Exhibit A**.

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6.   I am being compensated by the plaintiffs at a rate of $350 an hour for my work on this on this matter. My compensation is not in any way contingent on the content of my opinions or the outcome of this matter.

B.   **Scope of Work**

7.   I was asked to prepare legislative redistricting plans for the Washington Legislature (i) that respect traditional redistricting criteria and the redistricting criteria set forth in Washington law, and (ii) that include a legislative district numbered 14 ("LD 14") in the Yakima Valley region uniting communities of interest in the region and remedying the Section 2 violation found by the district court. With respect to the second requirement, I was asked to draw maps that include an LD 14 that, to the extent possible, unifies the population centers from East Yakima to Pasco that form a community of interest, including cities in the Lower Yakima Valley like Wapato, Toppenish, Granger, Sunnyside, Mabton, and Grandview.

8.   I prepared four remedial plans that satisfy all of the above requirements (Plaintiffs' Remedial Maps 1-4). At the request of Counsel for Plaintiffs, I prepared one additional remedial option that respects traditional redistricting criteria and the redistricting criteria set forth in Washington law, and that unites East Yakima with the Lower Yakima Valley cities listed above but does not include Pasco in LD 14 (Plaintiffs' Remedial Map 5).

9.   Attached to this report, I include district shapes for all five remedial maps in GeoJSON format, as well as block assignment files and pdf images of each remedial maps. I also include the remedial maps in an interactive html format that displays important roadways, geographical markers, and voting precinct boundaries. The maps in html format can be downloaded to a computer and opened on any internet browser.
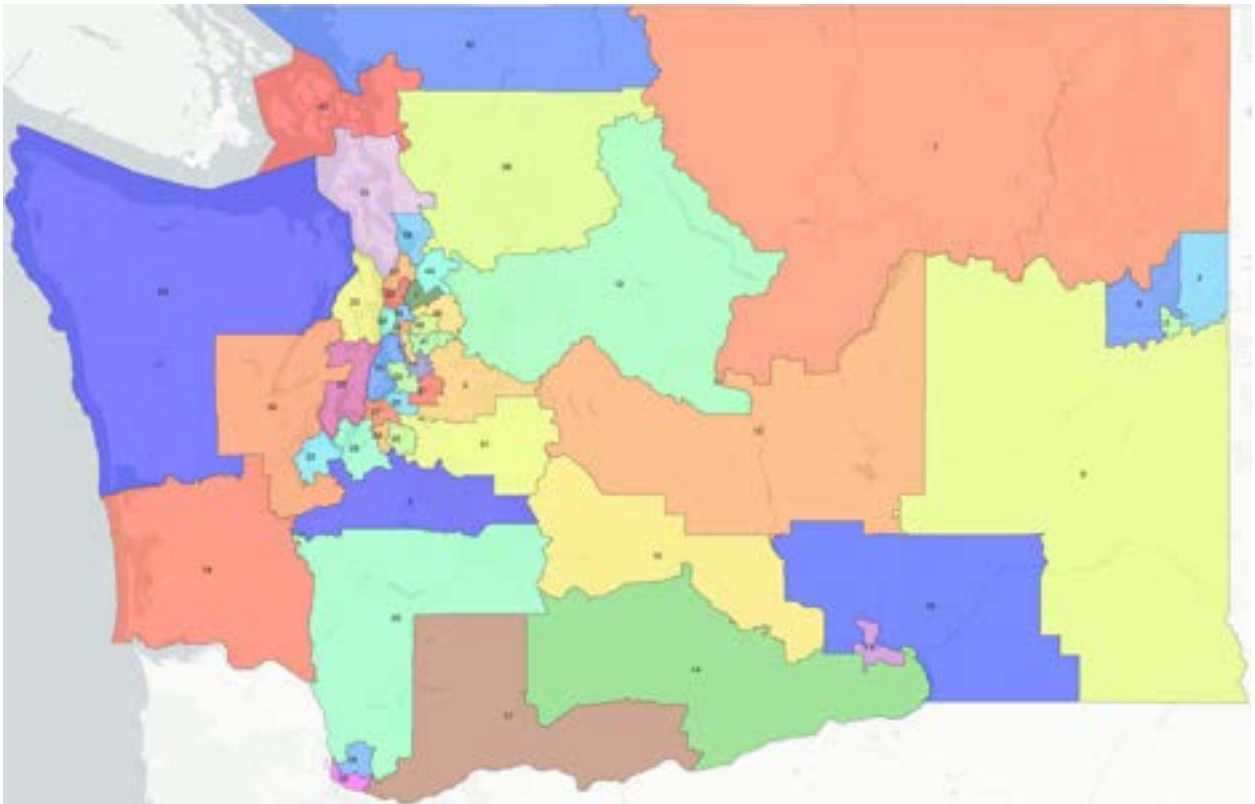
C.   **Approach**

10. I relied on the applicable redistricting criteria to draw the five remedial maps.

11. In drawing districts, I considered the criteria found in Washington Constitution Article 2, Section 43 and in statute at RCW 44.05.090. I drew districts to have a population as nearly equal as is practicable, consistent with the constitutional one-person-one-vote requirement. I drew districts to follow boundaries of political subdivisions and communities of interest. I minimized the number of counties, municipalities, and precincts split into multiple districts. And I endeavored to draw districts with convenient, contiguous, and compact territory, ensuring that areas of each district are connected and can be readily traversed by road.

12. I also considered other traditional redistricting principles in drawing the remedial plans. To the extent practicable, I sought to minimize changes to districts outside the Yakima Valley region. I also avoided pairing incumbents to the extent practicable, based on publicly available data.

13. I did not consider race or racial demographics in drawing the remedial plans. I did not make visible, view, or otherwise consult any racial demographic data while drawing districts. I did not assess the districts for performance to elect minority candidates of choice.

14. I did not consider election results or any partisan performance metrics in drawing the remedial plans, and I did not make visible, view, or otherwise consult any such data while drawing districts.

15. As indicated in further detail below, I conclude that all five remedial maps herein abide by Washington's redistricting criteria and other traditional redistricting criteria.

D. Plaintiffs' Remedial Map 1

16. Figure 1 below provides a visual depiction of Plaintiffs' Remedial Map 1. Remedial Map 1 includes an LD 14 that unites the population centers forming a community of interest between East Yakima and Pasco. The map also keeps the Yakama Nation Reservation whole in LD 14, along with some off-reservation trust lands and fishing villages.

Figure 1: Remedial Map 1

17. **Appendix Table 1**, located at the end of this document provides, for each district in Remedial Map 1, the total population based on Washington's adjusted 2020 U.S. Census data and the population deviation from the target population (157,251). According to Table

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1, Remedial Map 1 has a negligible total population deviation[1] of 0.23%, which is less than the Enacted Plan and well below the 10% population deviation threshold for state legislative plans accepted by courts.

18.   Remedial Map 1's districts are reasonably shaped and compact, particularly given the often oddly shaped precinct and municipal boundaries and variable topography in Washington. **Appendix Table 2** provides the Reock and Polsby-Popper compactness scores for Remedial Map 1, which are largely on par with the compactness scores for the Enacted Plan.[2]

19.   Remedial Map 1's districts are comprised of convenient, contiguous territory and are traversable.

20.   Remedial Map 1 respects communities of interest and minimizes splitting counties, cities, and precincts. **Appendix Table 3** provides statistics regarding county splits for Remedial Map 1, including county-district splits and district-county splits.[3] Remedial Map 1 performs about the same on county split metrics as compared to the Enacted Plan. With respect to precinct and city splits, I used the updated 2022 precinct boundaries and avoided any precinct or city splits unless such splits were necessary for the purposes of maintaining population equality and/or contiguity (including road connectivity).

21.   To the extent practicable after complying with the above criteria, I endeavored to minimize changes to districts outside the Yakima Valley region and avoid pairing incumbents.

22.   In summary, Remedial Map 1 is compliant with all relevant redistricting criteria.

E. **Plaintiffs' Remedial Map 2**

23.   Figure 2 below provides a visual depiction of Plaintiffs' Remedial Map 2. Remedial Map 2 contains an LD 14 that is identical to the LD 14 in Remedial Map 1, but offers an alternative configuration of surrounding districts.

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[1] Total population deviation for a redistricting plan is calculated by taking the difference between the population deviation in the least and most populous districts.

[2] Reock score is calculated by taking the ratio of the area of a district to the area of its minimum bounding circle. Polsby-Popper score is calculated by taking the ratio of the area of a district to the area of a circle whose circumference matches the perimeter of the district. Both scores range from 0 to 1. Scores closer to 0 indicate a less compact jurisdiction and scores closer to 1 indicate a more compact jurisdiction.

[3] The county-district split metric measures the extent to which the plan splits counties across districts. The district-county split metric measures the extent to which districts are split across counties.

Figure 2: Remedial Map 2

24. **Appendix Table 1** provides, for each district in Remedial Map 2, the total population based on Washington's adjusted 2020 U.S. Census data and the population deviation from the target population (157,251). According to Table 1, Remedial Map 2 has a negligible total population deviation of 0.22%, which is less than the Enacted Plan and well below the 10% population deviation threshold for state legislative plans accepted by courts.

25. Remedial Map 2's districts are reasonably shaped and compact, particularly given the often oddly shaped precinct and municipal boundaries and variable topography in Washington. **Appendix Table 2** provides the Reock and Polsby-Popper compactness scores for Remedial Map 2, which are largely on par with the compactness scores for the Enacted Plan

26. Remedial Map 2's districts are comprised of convenient, contiguous territory and are traversable.

27. Remedial Map 2 respects communities of interest and minimizes splitting counties, cities, and precincts. **Appendix Table 3** provides statistics regarding county splits for Remedial Map 2, which performs about the same on metrics of county splits as compared to the Enacted Plan. Cities and precincts were only split when necessary for the purposes of population deviation and/or contiguity (including road connectivity).

28. To the extent practicable after complying with the above criteria, I endeavored to minimize changes to districts outside the Yakima Valley region and avoid pairing incumbents.

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29.   In summary, Remedial Map 2 is compliant with all relevant redistricting criteria.
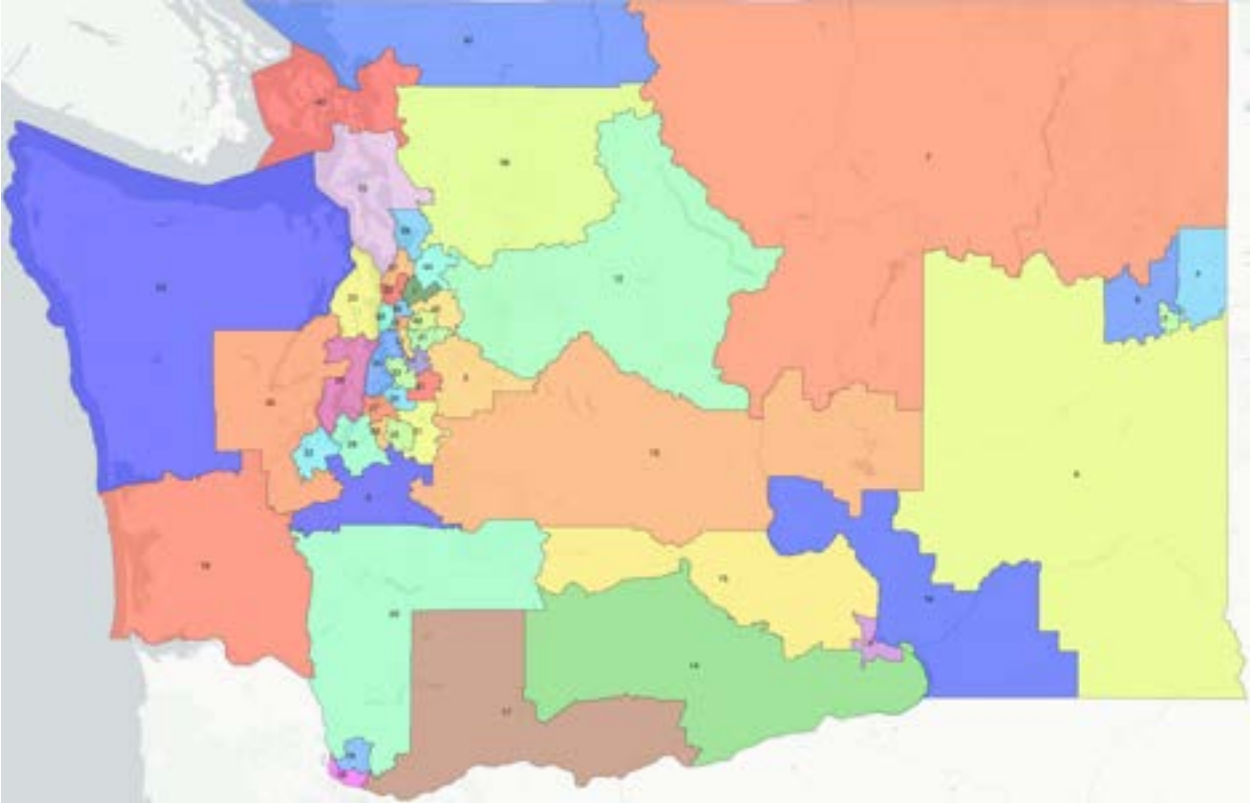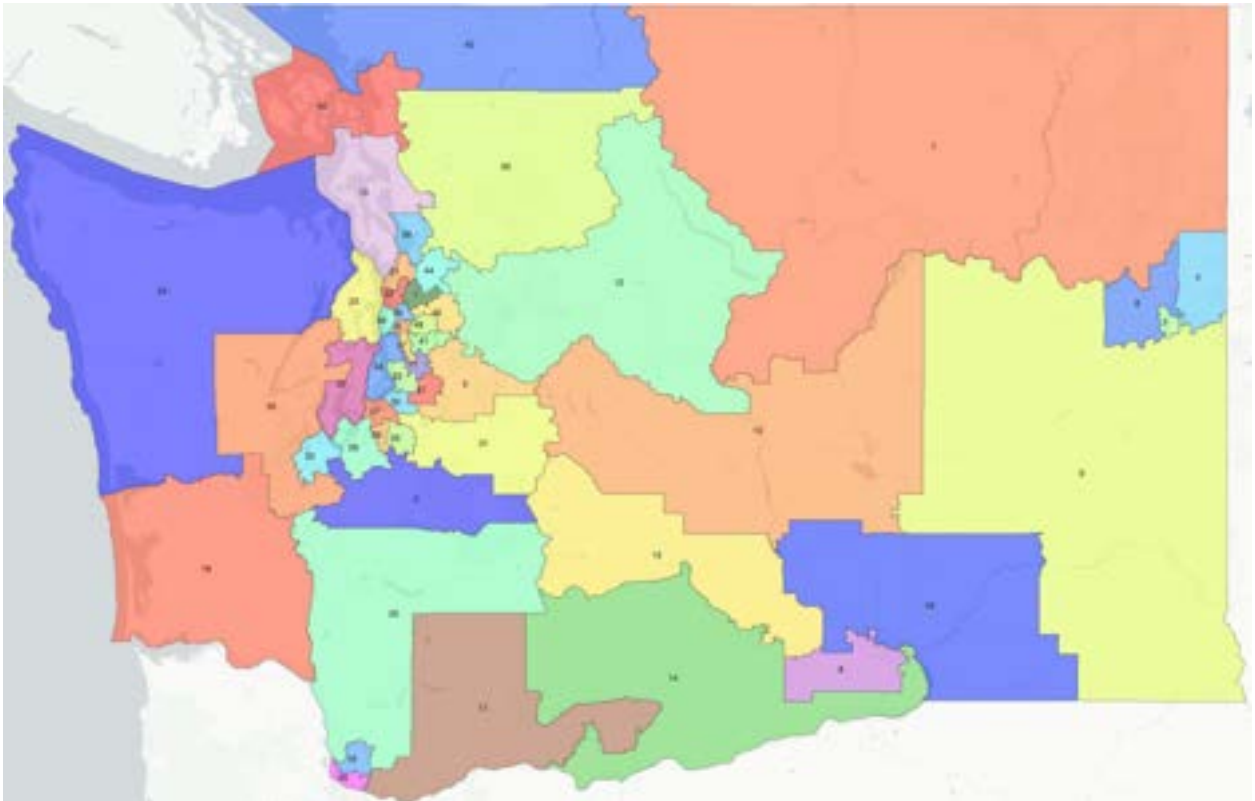
F. **Plaintiffs' Remedial Map 3**

30.   Figure 3 below provides a visual depiction of Plaintiffs' Remedial Map 3. Remedial Map
       3 includes an LD 14 that unites the population centers forming a community of interest
       between East Yakima to Pasco. In addition to keeping the Yakama Nation Reservation
       whole in LD 14, Remedial Map 3 also incorporates into LD 14 all of the Yakama Nation's
       off-reservation trust lands and fishing villages.

Figure 3: Remedial Map 3

31.   **Appendix Table 1** provides, for each district in Remedial Map 3, the total population based
       on Washington's adjusted 2020 U.S. Census data and the population deviation from the
       target population (157,251). According to Table 1, Remedial Map 3 has a negligible total
       population deviation of 0.24%, which is less than the Enacted Plan and well below the 10%
       population deviation threshold for state legislative plans accepted by courts.

32.   Remedial Map 3's districts are reasonably shaped and compact, particularly given the often
       oddly shaped precinct and municipal boundaries and variable topography in Washington.
       Appendix Table 2 provides the Reock and Polsby-Popper compactness scores for
       Remedial Map 3, which are largely on par with the compactness scores for the Enacted
       Plan.

33.   Remedial Map 3's districts are comprised of convenient, contiguous territory and are traversable.

34.   Remedial Map 3 respects communities of interest and minimizes splitting counties, cities, and precincts. **Appendix Table 3** provides statistics regarding county splits for Remedial Map 3, which performs the same or better on metrics of county splits as compared to the Enacted Plan. Cities and precincts were only split when necessary for the purposes of population deviation and/or contiguity (including road connectivity).

35.   To the extent practicable after complying with the above criteria, I endeavored to minimize changes to districts outside the Yakima Valley region and avoid pairing incumbents.

36.   In summary, Remedial Map 3 is compliant with all relevant redistricting criteria.

G.   **Plaintiffs' Remedial Map 4**

37.   Figure 4 below provides a visual depiction of Plaintiffs' Remedial Map 4. Remedial Map 4 includes an LD 14 that is identical to LD 14 in Remedial Map 3, but offers an alternative configuration of surrounding districts.
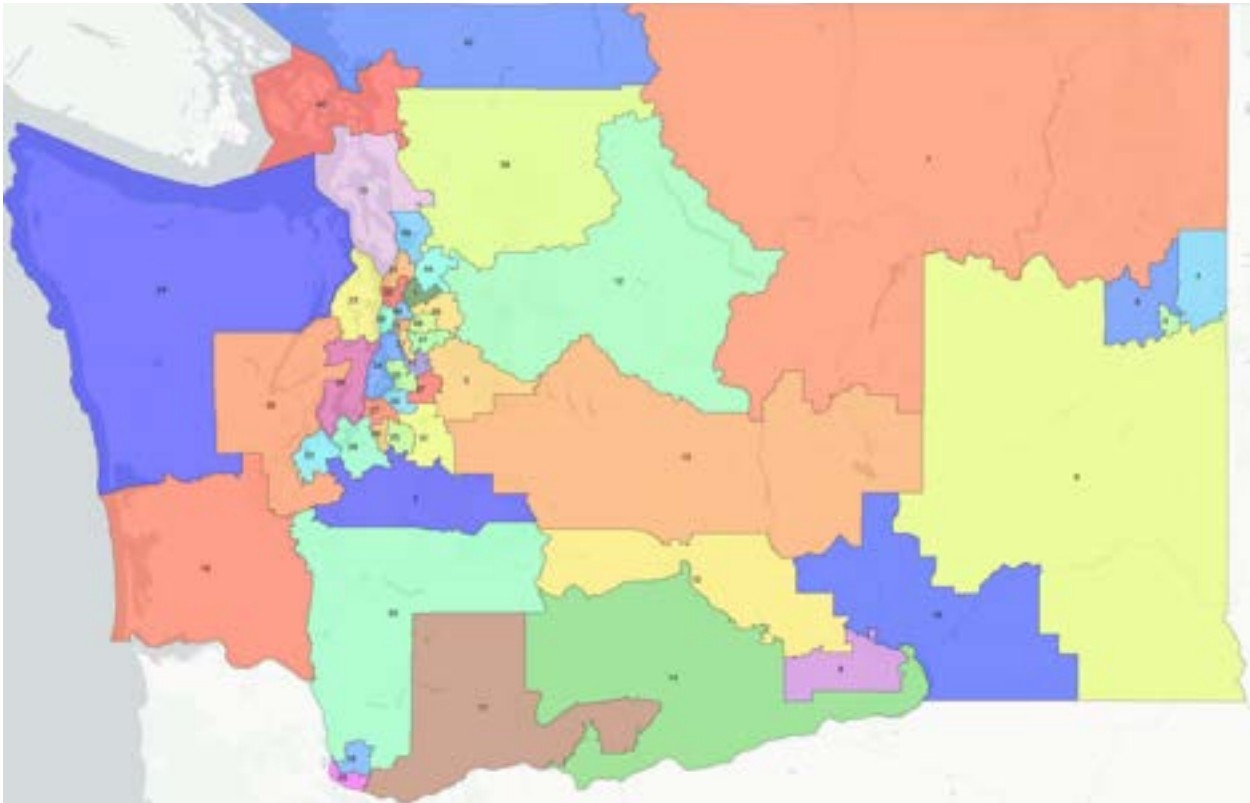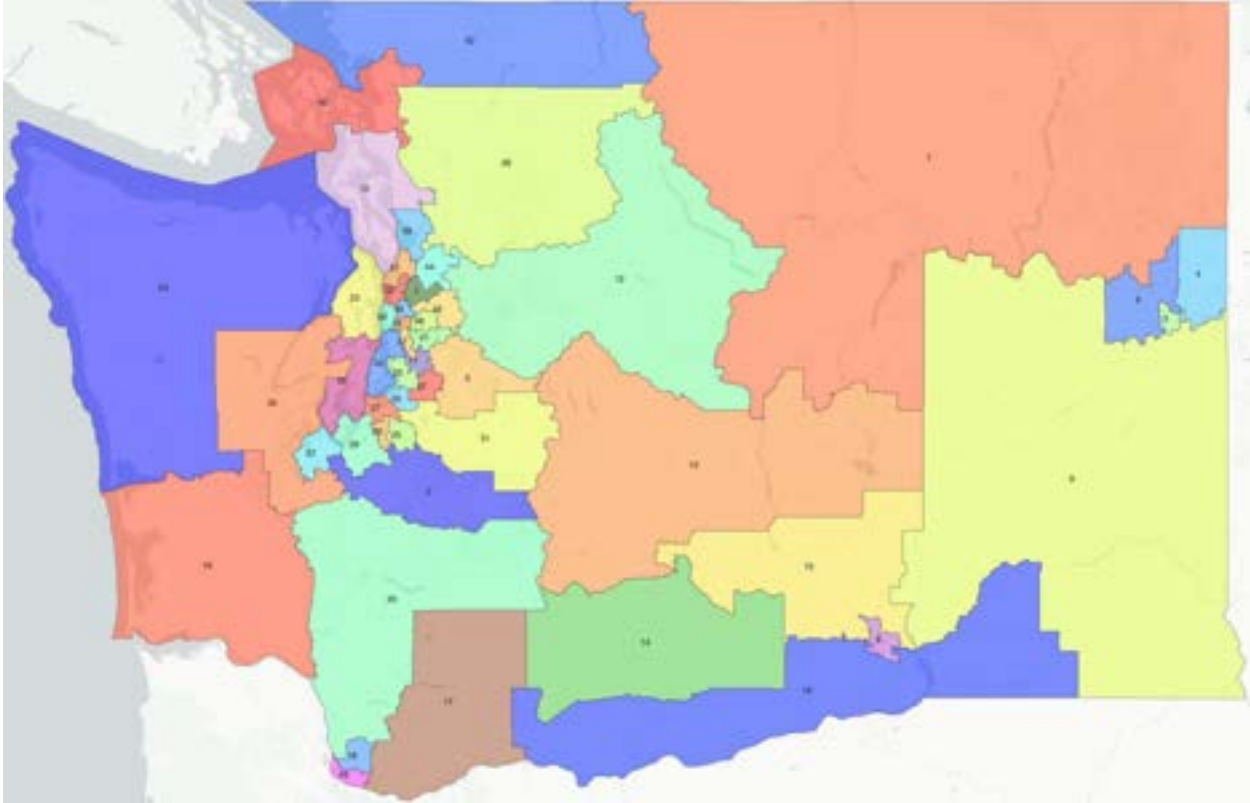

Figure 4: Remedial Map 4

38.   **Appendix Table 1** below provides, for each district in Remedial Map 4, the total population based on Washington's adjusted 2020 U.S. Census data and the population deviation from the target population (157,251). According to Table 1, Remedial Map 4 has

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a negligible total population deviation of 0.24%, which is less than the Enacted Plan and well below the 10% population deviation threshold for state legislative plans accepted by courts.

39.   Remedial Map 4's districts are reasonably shaped and compact, particularly given the often oddly shaped precinct and municipal boundaries and variable topography in Washington. **Appendix Table 2** below provides the Reock and Polsby-Popper compactness scores for Remedial Map 4, which are largely on par with the compactness scores for the Enacted Plan.

40.   Remedial Map 4's districts are comprised of convenient, contiguous territory and are traversable.

41.   Remedial Map 4 respects communities of interest and minimizes splitting counties, cities, and precincts. **Appendix Table 3** below provides statistics regarding county splits for Remedial Map 4, which performs about the same on metrics of county splits as compared to the Enacted Plan. Cities and precincts were only split when necessary for the purposes of population deviation and/or contiguity (including road connectivity).

42.   To the extent practicable after complying with the above criteria, I endeavored to minimize changes to districts outside the Yakima Valley region and avoid pairing incumbents.

43.   In summary, Remedial Map 4 is compliant with all relevant redistricting criteria.

H. Plaintiffs' Remedial Map 5

44.   Figure 5 below provides a visual depiction of Plaintiffs' Remedial Map 5. Remedial Map 5 includes an LD 14 that unites the population centers in Yakima County that form a community of interest, including East Yakima and cities in the Lower Yakima Valley like Wapato, Toppenish, Granger, Sunnyside, Mabton, and Grandview. The map also keeps the Yakama Nation Reservation whole in LD 14 and keeps nearly the entire district wholly within Yakima County.

Figure 5: Remedial Map 5

45. **Appendix Table 1** in the Appendix provides, for each district in Remedial Map 5, the total population based on Washington's adjusted 2020 U.S. Census data and the population deviation from the target population (157,251). According to Table 1, Remedial Map 4 has a negligible total population deviation of 0.25%, which is the same as the Enacted Plan and well below the 10% population deviation threshold for state legislative plans accepted by courts.

46. Remedial Map 5's districts are reasonably shaped and compact, particularly given the often oddly shaped precinct and municipal boundaries and variable topography in Washington. **Appendix Table 2** provides the Reock and Polsby-Popper compactness scores for Remedial Map 5, which are largely on par with the compactness scores for the Enacted Plan.

47. Remedial Map 5's districts are comprised of convenient, contiguous territory and are traversable.

48. Remedial Map 5 respects communities of interest and minimizes splitting counties, cities, and precincts. **Appendix Table 3** provides statistics regarding county splits for Remedial Map 5, which performs about the same on metrics of county splits as compared to the Enacted Plan. Cities and precincts were only split when necessary for the purposes of population deviation and/or contiguity (including road connectivity).

49.   To the extent practicable after complying with the above criteria, I endeavored to minimize changes to districts outside the Yakima Valley region and avoid pairing incumbents.

50.   In summary, Remedial Map 5 is compliant with all relevant redistricting criteria.

I.   Conclusion

51.   I reserve the right to modify, update, or supplement my report as additional information is made available to me.

52.   Pursuant to 28 U.S.C. § 1746, I, Kassra AR Oskooii, declare under penalty of perjury that the foregoing is true and correct.

Executed by:

[signature]

Dr. Kassra AR Oskooii

Dated: December 1, 2023

Appendix

Table 1 – Population Deviation

District	Enacted Map			Remedial Map 1			Remedial Map 2			Remedial Map 3			Remedial Map 4			Remedial Map 5		
	Total Pop	Deviation	%	Total Pop	Deviation	%	Total Pop	Deviation	%	Total Pop	Deviation	%	Total Pop	Deviation	%	Total Pop	Deviation	%
1	157284	33	0.021%	157284	33	0.021%	157284	33	0.021%	157284	33	0.021%	157284	33	0.021%	157284	33	0.021%
2	157441	190	0.121%	157371	120	0.076%	157244	-7	-0.004%	157429	178	0.113%	157429	178	0.113%	157441	190	0.121%
3	157244	-7	-0.004%	157244	-7	-0.004%	157244	-7	-0.004%	157244	-7	-0.004%	157244	-7	-0.004%	157244	-7	-0.004%
4	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%
5	157289	38	0.024%	157287	36	0.023%	157289	38	0.024%	157237	-14	-0.009%	157289	38	0.024%	157289	38	0.024%
6	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%
7	157250	-1	-0.001%	157248	-3	-0.002%	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%
8	157266	15	0.010%	157198	-53	-0.034%	157198	-53	-0.034%	157110	-141	-0.090%	157110	-141	-0.090%	157266	15	0.010%
9	157247	-4	-0.003%	157125	-126	-0.080%	157156	-95	-0.060%	157125	-126	-0.080%	157156	-95	-0.060%	157247	-4	-0.003%
10	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%
11	157228	-23	-0.015%	157228	-23	-0.015%	157228	-23	-0.015%	157228	-23	-0.015%	157228	-23	-0.015%	157228	-23	-0.015%
12	157247	-4	-0.003%	157175	-76	-0.048%	157247	-4	-0.003%	157096	-155	-0.099%	157247	-4	-0.003%	157247	-4	-0.003%
13	157248	-3	-0.002%	157145	-106	-0.067%	157250	-1	-0.001%	157360	109	0.069%	157312	61	0.039%	157283	32	0.020%
14	157253	2	0.001%	157166	-85	-0.054%	157166	-85	-0.054%	157318	67	0.043%	157318	67	0.043%	157377	126	0.080%
15	157231	-20	-0.013%	157409	158	0.100%	157203	-48	-0.031%	157122	-129	-0.082%	157070	-181	-0.115%	157084	-167	-0.106%
16	157254	3	0.002%	157081	-170	-0.108%	157318	67	0.043%	157270	19	0.012%	157309	58	0.037%	157242	-9	-0.006%
17	157239	-12	-0.008%	157405	154	0.098%	157405	154	0.098%	157346	95	0.060%	157346	95	0.060%	157239	-12	-0.008%
18	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%
19	157236	-15	-0.010%	157236	-15	-0.010%	157236	-15	-0.010%	157236	-15	-0.010%	157236	-15	-0.010%	157236	-15	-0.010%
20	157243	-8	-0.005%	157401	150	0.095%	157401	150	0.095%	157353	102	0.065%	157353	102	0.065%	157243	-8	-0.005%
21	157212	-39	-0.025%	157212	-39	-0.025%	157212	-39	-0.025%	157212	-39	-0.025%	157212	-39	-0.025%	157212	-39	-0.025%
22	157257	6	0.004%	157257	6	0.004%	157257	6	0.004%	157257	6	0.004%	157257	6	0.004%	157257	6	0.004%
23	157258	7	0.004%	157258	7	0.004%	157258	7	0.004%	157258	7	0.004%	157258	7	0.004%	157258	7	0.004%
24	157233	-18	-0.011%	157233	-18	-0.011%	157233	-18	-0.011%	157233	-18	-0.011%	157233	-18	-0.011%	157233	-18	-0.011%
25	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%
26	157227	-24	-0.015%	157227	-24	-0.015%	157227	-24	-0.015%	157227	-24	-0.015%	157227	-24	-0.015%	157227	-24	-0.015%
27	157239	-12	-0.008%	157239	-12	-0.008%	157239	-12	-0.008%	157239	-12	-0.008%	157239	-12	-0.008%	157239	-12	-0.008%
28	157289	38	0.024%	157289	38	0.024%	157289	38	0.024%	157289	38	0.024%	157289	38	0.024%	157289	38	0.024%
29	157054	-197	-0.125%	157054	-197	-0.125%	157054	-197	-0.125%	157054	-197	-0.125%	157054	-197	-0.125%	157054	-197	-0.125%
30	157277	26	0.017%	157277	26	0.017%	157277	26	0.017%	157277	26	0.017%	157277	26	0.017%	157277	26	0.017%
31	157223	-28	-0.018%	157420	169	0.107%	157304	53	0.034%	157352	101	0.064%	157242	-9	-0.006%	157223	-28	-0.018%
32	157211	-40	-0.025%	157211	-40	-0.025%	157211	-40	-0.025%	157211	-40	-0.025%	157211	-40	-0.025%	157211	-40	-0.025%
33	157256	5	0.003%	157256	5	0.003%	157256	5	0.003%	157256	5	0.003%	157256	5	0.003%	157256	5	0.003%
34	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%
35	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%	157268	17	0.011%
36	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%	157250	-1	-0.001%
37	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%
38	157215	-36	-0.023%	157215	-36	-0.023%	157215	-36	-0.023%	157215	-36	-0.023%	157215	-36	-0.023%	157215	-36	-0.023%
39	157306	55	0.035%	157306	55	0.035%	157306	55	0.035%	157306	55	0.035%	157306	55	0.035%	157306	55	0.035%
40	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%	157261	10	0.006%
41	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%	157234	-17	-0.011%
42	157263	12	0.008%	157263	12	0.008%	157263	12	0.008%	157263	12	0.008%	157263	12	0.008%	157263	12	0.008%
43	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%	157247	-4	-0.003%
44	157248	-3	-0.002%	157248	-3	-0.002%	157248	-3	-0.002%	157248	-3	-0.002%	157248	-3	-0.002%	157248	-3	-0.002%
45	157270	19	0.012%	157270	19	0.012%	157270	19	0.012%	157270	19	0.012%	157270	19	0.012%	157270	19	0.012%
46	157255	4	0.003%	157255	4	0.003%	157255	4	0.003%	157255	4	0.003%	157255	4	0.003%	157255	4	0.003%
47	157240	-11	-0.007%	157240	-11	-0.007%	157240	-11	-0.007%	157240	-11	-0.007%	157240	-11	-0.007%	157240	-11	-0.007%
48	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%
49	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%	157252	1	0.001%
Total Deviation	-	-	0.25%	-	-	0.23%	-	-	0.22%	-	-	0.24%	-	-	0.24%	-	-	0.25%

Table 2 – Compactness Scores

	Enacted Map	**Remedial Map 1**	**Remedial Map 2**	**Remedial Map 3**	**Remedial Map 4**	**Remedial Map 5**
Reock	0.44	0.42	0.42	0.43	0.42	0.43
Polsby-Popper	0.33	0.32	0.31	0.32	0.32	0.32

Table 3 – County Split Metrics

	Enacted Map	**Remedial Map 1**	**Remedial Map 2**	**Remedial Map 3**	**Remedial Map 4**	**Remedial Map 5**
Number of Counties Split	18	20	19	20	19	19
County-District Splitting	1.61	1.68	1.64	1.61	1.63	1.62
District-County Splitting	1.25	1.25	1.26	1.24	1.25	1.26

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Academic Appointments

University of Delaware
Political Science & International Relations

Associate Professor	2021-Present
Assistant Professor	2016-2021
Provost Teaching Fellow	2022-Present

Current Faculty Affiliations:
Data Science Institute (DSI)	2023-Present
Master of Science in Data Science (MSDS)	2023-Present
Center for Political Communication (CPC)	2016-Present
Center for the Study of Diversity (CSD)	2016-Present

Former Faculty Affiliations:
Race, Justice, Policy Research Initiative (RJPRI)	2017-2023

Education

University of Washington   Ph.D., 2016
Department of Political Science

    General Fields: American Politics & Political Methodology
    Specialized Field: Minority and Race Politics

University of Washington   M.A., 2013
Department of Political Science

Center for Statistics & the Social Sciences (CSSS)
Political Methodology Field Certificate (2013)

University of Washington   B.A., 2008
Major: Political Science
Minors: Human Rights and Law, Societies, & Justice

Peer-Reviewed Journal Publications

"In the Shadow of September 11: The Roots and Ramifications of Anti-Muslim Attitudes in the United States." ***Advances in Political Psychology***. w/ Lajevardi, N., Saleem, M., and Docherty, M. (Forthcoming)

"Social Mobility Through Immigrant Resentment: Explaining Latinx Support for Restrictive Immigration Policies and Anti-Immigrant Candidates." ***Public Opinion Quarterly***. w/ Hickel, F., and Collingwood, L. (Forthcoming)

"The Participatory Implications of Racialized Policy Feedback." 2023. **Perspectives on Politics**, 21(3): 932-950. w/ Garcia-Rios, S., Lajevardi, N. and Walker, H.

"Undermining Sanctuary? When Local and National Partisan Cues Diverge." 2023. **Urban Affairs Review**, 59(1): 133-169. w/ Collingwood, L. & Martinez, G.

"Fight Not Flight: The Effects of Explicit Racism on Minority Political Engagement." 2022. **Electoral Studies**, 80: 102515. w/ Besco, R., Garcia-Rios, S., Lagodny, J., Lajevardi, N., Tolley, E.

"Hate, Amplified? Social Media News Consumption and Anti-Muslim Policy Support." 2022. **Journal of Public Policy**, 42: 656-683. w/ Lajevardi, N. and Walker, H. (FirstView)

"Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI and EI-RxC Methods." 2022. **Sociological Methods and Research**, 51(1): 271-304. w/ Barreto, M., Collingwood & Garcia-Rios, S.

"Beyond Generalized Ethnocentrism: Islam-Specific Beliefs and Prejudice toward Muslim Americans." 2021. **Politics, Groups, and Identities**, 9(3): 538-565. w/ Dana, K. & Barreto, M.

"Opinion Shift and Stability: The Information Environment and Long-Lasting Opposition to Trump's Muslim Ban." 2021. **Political Behavior**, 43: 301–337. w/ Lajevardi, N. & Collingwood, L.
Covered in: *The Washington Post (Monkey Cage)*

"The Role of Identity Prioritization: Why Some Latinx Support Restrictionist Immigration Policies and Candidates." 2020. **Public Opinion Quarterly**, 84: 860–891. w/ Hickel, F., Alamillo, R. & Collingwood, L.

"Perceived Discrimination and Political Behavior." 2020. **British Journal of Political Science**, 50(3): 867-892.

"The Paradox Between Integration and Perceived Discrimination Among American Muslims." 2020. **Political Psychology**, 41(3): 587-606. w/ Lajevardi, N., Walker, H. & Westfall, A.
Winner of the 2019 American Political Science Association Race, Ethnicity, and Politics Section Best Paper Award.

"Veiled Politics: Experiences with Discrimination among Muslim Americans." 2019. **Politics and Religion**, 12(2): 629-677. w/ Dana, K., Lajevardi, N., & Walker, H.

"Partisan Attitudes toward Sanctuary Cities: The Asymmetrical Effects of Political Knowledge." 2018. **Politics and Policy**, 46 (6): 951-984. w/ Dreier, S. & Collingwood, L.

"A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump's Muslim Ban." 2018. **Political Behavior**, 40: 1035-1072. w/ Collingwood, L. & Lajevardi, N.

Covered in: *The Washington Post (Monkey Cage), Vox, ThinkProgress, NPR, Al Jazeera, Middle East Eye, Psychology Today, & Social Psych Online*

"Old-Fashioned Racism, Contemporary Islamophobia, and the Political Isolation of Muslim Americans in the Age of Trump." 2018. **Journal of Race, Ethnicity, and Politics**, 3(1): 112-152. w/ Lajevardi, N.

"The Politics of Choice Reconsidered: Partisanship, Ideology, and Minority Politics in Washington's Charter School Initiative." 2018. **State Politics and Policy Quarterly**, 18(1): 61-92. w/ Collingwood, L. & Jochim, A.

"Muslims in Great Britain: The Impact of Mosque Attendance on Political Behaviour and Civic Engagement." 2018. **Journal of Ethnic and Migration Studies**, 44(9): 1479-1505. w/ Dana, K.

"eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC." 2016. **R Journal**, 8(2): 92-101. w/ Collingwood, L., Barreto, M. & Garcia-Rios, S.

"How Discrimination Impacts Sociopolitical Behavior: A Multidimensional Perspective." 2016. **Political Psychology**, 37(5): 613-640.

"Mosques as American Institutions: Mosque Attendance, Religiosity and Integration into the Political System among American Muslims." 2011. **Religions**, 2(4): 504-524. w/ Dana, K. & Barreto, M.

Book Chapters Encyclopedic Entries

"Discrimination." In **Edward Elgar Encyclopedia of Political Sociology** edited by Maria Grasso and Marco Giugni. (Forthcoming)

"Race and Racism in U.S. Campaigns." 2020. In **Oxford Handbook on Electoral Persuasion** edited by Liz Suhay, Bernie Grofman, and Alex Trechsel, 15:278–295. w/ Christopher Parker, Christopher Towler, and Loren Collingwood.

Book Reviews

"Understanding Muslim Political Life in America: Contested Citizenship in the Twenty-First Century." Edited by Brian R. Calfano and Nazita Lajevardi. Philadelphia: Temple University Press, 2019. 248p. **Perspectives on Politics**.

Public Writing	"Biden reverses Trump's 'Muslim Ban.' Americans support the decision." **The Washington Post** *(Monkey Cage)* (27 January, 2021). w/ Lajevardi, N. and Collingwood, L.
	"Targeted: Veiled Women Experience Significantly More Discrimination in the U.S." **Religion in Public** (21 January, 2020). w/ Dana, K., Lajevardi, N., and Walker, H.
	"Here's what the Democrats need to do to get the DREAM Act through Congress." **LSE American Politics and Policy Blog** (29 January, 2018). Also covered by Newsweek U.S. Edition. w/ Walker, H. and Garcia-Rios, S.
	"Why Individual-Level Opinion Rapidly Shifted Against Trump's 'Muslim Ban' Executive Order." **Religion in Public** (17 January, 2018). w/ Collingwood, L. and Lajevardi, N.
	"Allies in name only? Latino-only leadership on DACA may trigger implicit racial biases among White liberals." **LSE American Politics and Policy Blog** (28 September, 2017). w/ Garcia-Rios, S. and Walker, H.
	"Protests against Trump's immigration executive order may have helped shift public opinion against it" **LSE American Politics and Policy Blog** (12 February, 2017). w/ Collingwood, L. and Lajevardi, N.
Select Works In Progress	"The Influence of American Identity on Anti-Muslim Policy Preferences Across Partisans." w/ Lajevardi, N. (Invited for R&R)
	"Neighboring Identities: Psychological and Political Reactions to Xenophobic Campaign Attacks." w/ Basco, R., Fisher, S., Garcia-Rios, S., Lagodny, J., Lajevardi, N., and Tolley, E. (In Progress)
	"Partisan Winners and Losers: Testing Alternative Frames of Congressional Election Results Among White and Latino Voters." w/ Valenzuela, A. and Collingwood, L. (In Progress)
	"Polarizing Cues Revisited: The Role of Partisan Benchmarking." w/ Kipp, S., Medenica, V., and Walker, H. (In Progress)
	"Voting for Violence? Tracing Ethno-Racial and Partisan Differences in Support for Anti-Democratic Violence Before and After the 2020 Presidential Election." w/ Valenzuela, A. and Collingwood, L. (In Progress)
	"White Candidates and Latino Voters: The Significance of Symbolic vs Substantive Ethnic Cues." w/ Collingwood, L. and Alamillo, R. (In Progress)

Grants, Fellowships, & Awards	Nominee of UD's Excellence in Teaching Award	(2023)
	UD Provost Teaching Fellow	(2022-)
	APSA Race, Ethnicity, and Politics Best Paper Award	(2019)
	w/ Nazita Lajevardi, Hannah Walker and Aubrey Westfall	
	AAPOR Student-Faculty Diversity Pipeline Award	(2019)

CTAL Instructional Improvement Grant: Engaging Diversity
in Political Science w/ Kara Ellerby ($11,000)   (2018)
POSCIR Seed Research Grant ($1,500)   (2018)
DEL General University Research Grant ($7,500)   (2017)
UW Political Science Research Fellowship (est. $13,000)   (2016)
Dissertation Improvement Research Grant, UCLA ($3000)   (2015)
Dean Recognition for Exceptional Pedagogical Contribution, UW   (2014)
Best Graduate Paper in PoliSci (w/Hannah Walker), UW   (2014)
UW Center for Democracy & VRA Research Fellowship ($5,000)   (2014)
UW Center for Democracy & VRA Research Fellowship ($5,000)   (2013)
Center for Statistics and the Social Sciences Grant ($1,000)   (2013)
UW WISER Research Grant ($2500)   (2011-14)
UW WISER Survey Research Fellowship ($20,000)   (2011-14)
Grad. Opportunities & Minority Achievement Fellowship ($4,000)   (2010-11)
Donald R. Matthews Graduate Fellowship ($40,000)   (2010-11)
Jody Deering Nyguist Award for Excellence in Public Speaking   (2008)

Research Center Affiliations		
Race, Justice, Policy Research Initiative, UD	(2017 -)
Center for Political Communication, UD	(2016 -)
Center for the Study of Diversity, UD	(2016 -)
UW Center for Democracy and Voting Rights Research	(2013-14)
Washington Institute for the Study of Race & Ethnicity (WISER)	(2010-16)
Center for Social Science and Statistics (CSSS)	(2010-16)
Washington Survey Research Center (WASRC)	(2010-15)

Teaching Experience

University of Delaware (2016 -)
POSC 150: Intro to American Politics (x10)
POSC 230: Intro to Politics and Social Justice (x2)
POSC 413: Minority Politics, Representation, and Voting Rights (x4)
POSC 867: Race, Ethnicity, and Politics (Graduate Seminar) (x3)
POSC 807: American Political Behavior (Graduate Seminar) (x1)

University of Washington (2011-2016)
POLS 202: Intro to American Politics (x2)
POLS 357: Minority Representation and the Voting Rights Act (x1)
POLS 205: Political Science as a Social Science (TA)
POLS 317: US Race and Ethnic Politics (TA)
POLS 353: US Congress (TA)
POLS 503: Advanced Research Design and Analysis (TA)
LAW E 558: Voting Rights Research and the Law (TA)

External Invited Talks/Panels   "Diversity and the State of Democratic Citizenship." Featured invited roundtable sponsored by the *Center for the Study of Democratic Citizenship*. April 23,

2021.

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

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

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

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

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

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

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

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

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

Internal or Public Invited Talks/Panels

"How Democratic is the U.S. Constitution, and to What Extent did the Founding Fathers Oppose Majority Rule?" Speaker. University Day Public Lecture. March 18, 2023.

"Race, Ethnicity, and Gender in the 2020 Election." Speaker. Panel sponsored by the the University of Delaware POSCIR. December 14, 2020.

"Building Community: Scholarship and Connection among Faculty of Color." Speaker. Panel sponsored by the Center for the Study of Diversity (CSD) at the University of Delaware. February 24, 2020.

"Executive Power and the U.S. Democracy." Talk sponsored by the 2019 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2019.

"Opinion Shift and Stability: Long-Lasting Opposition toward Trump's Muslim Ban." Talk sponsored by the Department of Sociology and Criminal Justice Colloquium Speaker Series at the University of Delaware. April 24, 2019.

"Old-Fashioned Racism and the Roots of Contemporary Islamophobia." Talk sponsored by the Center for the Study of Diversity (CSD) Colloquium Speaker Series at the University of Delaware. December 6, 2018.

"Understanding Executive Power in the United States." Talk sponsored by the 2018 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2018.

"The Inclusion and Exclusion of Minority Groups in the United States." Talk sponsored by the 2017 YALI Mandela Washington Fellows Program at the University of Delaware. July 11, 2017.

"Inclusion and Exclusion: Perceptions of Discrimination in the Workplace." Diversity Summit Presenter. Talk sponsored by the Office of Equity and Inclusion at the University of Delaware. June 20, 2017.

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

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

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

30, 2016.

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

Select Conference Presentations	2021

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

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

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

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

2019

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

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

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

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

2018

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

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

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

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

2017

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

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

"The Racial Shield as Racism Exoneration: Explaining White Racist Support for Conservative Minority Candidates." Paper Presentation at the Annual Western Political Science Association Conference (WPSA) in Vancouver BC, Canada.

2016

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

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

| Student Supervision | Sadie Ellington, Dissertation Committee Member (POSC) |
| | Enes Aksu, Dissertation Committee Member (POSC) |

Enes Tuzgen, Dissertation Committee Member (POSC)
Olga Gerasimenko, Dissertation Committee Member (POSC)
Furkan Karakayan, Dissertation Committee Member (POSC)
Richard Takyi Amoah, Dissertation Committee Member (ECON)
Sheila Afrakomah, Dissertation Committee Member (ECON)
Ahmet Ates, Dissertation Committee Member (POSC)
Charles Mays, Long Paper and Dissertation Chair (POSC)
Ian Mumma, Long Paper Committee Member (POSC)
Clark Shanahan, Long Paper Committee Member (POSC)

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

Professional Service	**Editorial Board Member**

Editorial Board Member
Politics and Religion (6/2018 - 12/2021)

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

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

APSA Race, Ethnicity, and Politics Best Paper Award Committee Member (2020)

University Service
2019 Summer Educational and Cultural Experience Program (SECEP) Lecturer of Politics and Justice in the United States. (July 27 - August 20, 2019)

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

Conference Coordination

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

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

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

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

Expert Consulting Experience	*State of Maryland Attorney General's Office*; 2021 MD Redistricting
	Baltimore County Branch of the NAACP v. Baltimore County, Maryland, No. 1:21-cv-03232-LKG (D. Md. 2022)
	Common Cause Florida v. Lee, 4:22-cv-109-AW-MAF (N.D. Fla.)
	Common Cause Florida v. Byrd, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed]
	Dickinson Bay Area NAACP Branch v. Galveston County, Texas, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified]
	Reyes v. Chilton, 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed]
	Roswell Independent School District (RISD); 2022 Redistricting
	Caroline County Branch of the NAACP v. Town of Federalsburg, Civ. Action No. 23-SAG-00484 (D.Md. 2023)
	Cobb County Board of Elections and Registration, No. 1:22-cv-02300-ELR (N.D. Ga. 2022)
	Coca v. City of Dodge City, et al. Case no. 6:22-cv-01274 (D Kan. 2022) [Deposed]

Previous Research Positions	**Senior Researcher, Washington Poll**	2010-2014
	Public Opinion Survey Design, Programming, and Analysis.	

Researcher, Center for Democracy & Voting Rights Research   2013-2014
Racially Polarized Voting (RPV) Analysis of jurisdictions in states such as: California, Florida, Texas, and Washington.

Investigator, Washington State Charter School Initiative   2013
Precinct and school district level data collection and analysis of the I-1240 Vote for S360 Polling Firm and Melinda & Gates Foundation.

Skills & Additional Information	**Software**: R, STATA, LaTeX, ESRI, DRA
	Languages: Farsi (Persian)–Native Speaker
	R Packages: eiCompare (contributor), eiExpand (contributor)

EXHIBIT 2

December 1, 2023 Declaration of Dr. Collingwood

Expert Report of Dr. Loren Collingwood

Loren Collingwood

2023-12-01

Executive Summary

I have been retained by plaintiffs as an expert, and have been asked to analyze whether five plaintiff proposed remedial maps will perform electorally for Latino voters in Legislative District 14 in the Yakima Valley region– the area comprising Central Washington's large Latino community.

To assess electoral performance, as in my prior reports, I examine whether the minority-preferred candidate wins in contests featuring racially polarized voting in nine statewide elections subset to LD-14 in each of plaintiffs' five remedial plans.[1]

An electoral performance analysis reconstructs previous election results based on new district boundaries to assess whether a minority or white preferred candidate is most likely to win in a given jurisdiction under consideration (i.e., a newly adopted legislative district).

Based on my analysis, I conclude that all five of plaintiffs' proposed maps provide Latino voters in the Yakima Valley region with an equal opportunity to elect candidates of choice to the state legislature in LD-14.

My opinions are based on the following data sources: Washington State general election precinct/vtd returns from 2016-2020; 2020 US Census block data, 2021 5-Year American Community Survey (ACS) data, and remedial map geojson files provided by plaintiffs' counsel.

I am being compensated at a rate of $400/hour. My compensation is not contingent on the opinions expressed in this report, on my testimony, or on the outcome of this case.

Background and Qualifications

I am an associate professor of political science at the University of New Mexico. Previously, I was an associate professor of political science and co-director of civic engagement at the Center for Social Innovation at the University of California, Riverside. I have published two

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[1] My prior reports submitted to the court as Trial Exhibits 1-2 and my testimony at trial demonstrate which candidates are majority (white) and minority (Latino) preferred.

books with *Oxford University Press*, 42 peer-reviewed journal articles, and nearly a dozen book chapters focusing on sanctuary cities, race/ethnic politics, election administration, and RPV. I received a Ph.D. in political science with a concentration in political methodology and applied statistics from the University of Washington in 2012 and a B.A. in psychology from the California State University, Chico, in 2002.

In between my B.A. and Ph.D., I spent 3-4 years working in private consulting for the survey research firm Greenberg Quinlan Rosner Research in Washington, D.C. I also founded the research firm Collingwood Research, which focuses primarily on the statistical and demographic analysis of political data for a wide array of clients, and lead redistricting and map-drawing and demographic analysis for the Inland Empire Funding Alliance in Southern California. I was the redistricting consultant for the West Contra Costa Unified School District, CA, independent redistricting commission in which I was charged with drawing court-ordered single member districts. I am contracted with Roswell, NM, Independent School District to draw single member districts.

I served as a testifying expert for the plaintiff in the Voting Rights Act Section 2 case *NAACP v. East Ramapo Central School District*, No. 17 Civ. 8943 (S.D.N.Y. 2020), on which I worked from 2018 to 2020. In that case, I used the statistical software eiCompare and WRU to implement Bayesian Improved Surname Geocoding (BISG) to identify the racial/ethnic demographics of voters and estimate candidate preference by race using ecological data. I am the quantitative expert in *LULAC vs. Pate (Iowa* 2021), and have filed an expert report in that case. I am the BISG expert in *LULAC Texas et al. v. John Scott et al.*, 1:21-cv-0786-XR (W.D. Tex. 2022). I filed two reports and have been deposed in that case. I was the RPV expert for the plaintiff in *East St. Louis Branch NAACP, et al. vs. Illinois State Board of Elections, et al.*, (N.D. Ill. 2021), having filed two reports in that case. I am the Senate Factors expert for plaintiff in *Pendergrass v. Raffensperger (N.D. Ga. 2021)*, where I filed two reports, was deposed, and testified at trial. I was the RPV expert for plaintiff in *Johnson, et al., v. WEC, et al.,* No. 2021AP1450-OA (Wis. 2022), having filed three reports in that case. I was the RPV expert for plaintiff in *Faith Rivera, et al. v. Scott Schwab and Michael Abbott* (Kan. 2022). I filed a report, was deposed, and testified at trial. I served as the RPV expert for the intervenor in *Walen and Henderson v. Burgum and Jaeger*, No 1:22-cv-00031-PDW-CRH (D.N.D. 2023), where I filed a report and testified at trial. I was the RPV expert in *Lower Brule Sioux Tribe v. Lyman County* (D.S.D. 2022), where I filed a report. In this case, I was the RPV expert for plaintiffs, where I filed two reports, was deposed, and testified at trial. I was the RPV expert for plaintiff in *IE United et al. v. Riverside County,* CVRI2202423 (Cal. Super. Ct. 2022), where I filed a report and was deposed. I was the RPV expert for plaintiff in *Paige Dixon v. Lewisville Independent School District, et al.,* Civil Action No. 4:22-cv-00304 (E.D. Tex. 2022), where I filed two expert reports. I was the RPV expert for plaintiff in *Turtle Mountain Band of Chippewa Indians v. Jaeger*, No. 3:22-cv-00022-PDW-ARS (D.N.D. 2023), where I filed two reports, was deposed, and testified at trial.

My curriculum vitae was submitted to the Court as Trial Exhibit 531.

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Proposed Maps

Plaintiffs' counsel provided me with the geojson files for five remedial maps. Each map's 2021 ACS Citizen Voting Age Population (CVAP) demographic estimates are presented in Table 1 below.

Table 1. Demographics 2021 CVAP.

Demographic	Map.1	Map.2	Map.3	Map.4	Map.5
Percent Hispanic CVAP 2021	51.65	51.65	50.14	50.14	47
Percent White CVAP 2021	37.14	37.14	38.86	38.86	42.34
Percent Black CVAP 2021	1.37	1.37	1.34	1.34	1.51
Percent Native CVAP 2021	7.08	7.08	7.04	7.04	6.91
Percent AAPI CVAP 2021	1.95	1.95	1.96	1.96	1.75

In terms of electoral performance, I previously analyzed the performance of LD-15 in the Enacted Plan. An electoral performance analysis tests whether different plans would provide a more equal ability for minority voters to participate in the electoral process and to elect candidates of choice. For the performance analysis, I gathered precinct results for the following nine statewide elections: 2016 U.S. Senate, 2016 President, 2016 Governor, 2018 U.S. Senate, 2020 Treasurer, 2020 State Supreme Court Position 3, 2020 President, 2020 Governor, 2020 Attorney General. To examine how a candidate performs in plaintiffs' remedial versions of LD-14, I then subset the precincts to only those falling within the new LD-14 boundary. I did not use district-based elections for the performance analysis because by nature they do not allow for a full reconstruction of previous elections in the new proposed district boundaries. For this reason, in addition to the low turnout and other unusual circumstances outlined in my prior reports, the LD-15 2022 election is not a probative gauge of performance in remedial districts, and I did not utilize it to analyze the performance of remedial districts in this report.

Assessing electoral performance in the proposed maps, LD-14 performs well – and similarly – for Latino voters in all five of plaintiffs' remedial maps. It should be noted that maps 1 and 2, then 3 and 4 are the same LD-14 so produce identical numbers. The average margin of victory in Maps 1 and 2 in my analysis is 14.3% for the Latino-preferred candidate. The average margin of victory in Maps 3 and 4 in my analysis is 14.1% for the Latino-preferred candidate. Finally, the average margin of victory in Map 5 is 13.6%. Thus, all maps produce similar electoral outcomes. Notably, Latino-preferred state legislative candidates will frequently receive a lower percentage than statewide candidates, and that is especially the case where the candidate is also Latino. As a result, these performance results are sufficient to provide Latino voters with an equal opportunity to elect candidates to the state legislature. The results of my analysis are reported below in Figure 1 and Table 2 in the Appendix.

Figure 1. Electoral Performance analysis, Legislative District 14, 2016-2020 statewide general elections, paneled by map alternative.

Conclusion

Overall, each of the five proposed maps perform well for Latino voters' preferred candidates in LD-14. Therefore, Latino voters have a strong possibility of being able to elect their preferred candidate if any of plaintiffs remedial maps 1-5 is selected.

Pursuant to 28 U.S.C. § 1746, I, Loren Collingwood, declare the foregoing is true and correct.

Dr. Loren Collingwood

Dated: December 1, 2023

Appendix

Table 2. Electoral Performance Analysis, LD-14 in Maps 1-5, 2016-2020 contests.

Candidate	Preferred_Candidate	Map	Year	Contest	Vote
Trump	White	Map 1	2020	President	0.407
Biden	Latino	Map 1	2020	President	0.569
Culp	White	Map 1	2020	Governor	0.444
Inslee	Latino	Map 1	2020	Governor	0.554
Larkin	White	Map 1	2020	Attorney General	0.423
Ferguson	Latino	Map 1	2020	Attorney General	0.576
Davidson	White	Map 1	2020	Treasurer	0.449
Pellicciotti	Latino	Map 1	2020	Treasurer	0.551
Larson	White	Map 1	2020	State Sup. Ct. 3	0.424
Montoya	Latino	Map 1	2020	State Sup. Ct. 3	0.574
Trump	White	Map 2	2020	President	0.407
Biden	Latino	Map 2	2020	President	0.569
Culp	White	Map 2	2020	Governor	0.444
Inslee	Latino	Map 2	2020	Governor	0.554
Larkin	White	Map 2	2020	Attorney General	0.423
Ferguson	Latino	Map 2	2020	Attorney General	0.576
Davidson	White	Map 2	2020	Treasurer	0.449
Pellicciotti	Latino	Map 2	2020	Treasurer	0.551
Larson	White	Map 2	2020	State Sup. Ct. 3	0.424
Montoya	Latino	Map 2	2020	State Sup. Ct. 3	0.574
Trump	White	Map 3	2020	President	0.410
Biden	Latino	Map 3	2020	President	0.566
Culp	White	Map 3	2020	Governor	0.448
Inslee	Latino	Map 3	2020	Governor	0.550
Larkin	White	Map 3	2020	Attorney General	0.426
Ferguson	Latino	Map 3	2020	Attorney General	0.573
Davidson	White	Map 3	2020	Treasurer	0.452
Pellicciotti	Latino	Map 3	2020	Treasurer	0.547
Larson	White	Map 3	2020	State Sup. Ct. 3	0.409
Montoya	Latino	Map 3	2020	State Sup. Ct. 3	0.588
Trump	White	Map 4	2020	President	0.410
Biden	Latino	Map 4	2020	President	0.566

Candidate	Preferred_Candidate	Map	Year	Contest	Vote
Culp	White	Map 4	2020	Governor	0.448
Inslee	Latino	Map 4	2020	Governor	0.550
Larkin	White	Map 4	2020	Attorney General	0.426
Ferguson	Latino	Map 4	2020	Attorney General	0.573
Davidson	White	Map 4	2020	Treasurer	0.452
Pellicciotti	Latino	Map 4	2020	Treasurer	0.547
Larson	White	Map 4	2020	State Sup. Ct. 3	0.409
Montoya	Latino	Map 4	2020	State Sup. Ct. 3	0.588
Trump	White	Map 5	2020	President	0.403
Biden	Latino	Map 5	2020	President	0.571
Culp	White	Map 5	2020	Governor	0.443
Inslee	Latino	Map 5	2020	Governor	0.554
Larkin	White	Map 5	2020	Attorney General	0.425
Ferguson	Latino	Map 5	2020	Attorney General	0.575
Davidson	White	Map 5	2020	Treasurer	0.454
Pellicciotti	Latino	Map 5	2020	Treasurer	0.546
Larson	White	Map 5	2020	State Sup. Ct. 3	0.426
Montoya	Latino	Map 5	2020	State Sup. Ct. 3	0.571
Hutchinson	White	Map 1	2018	U.S. Senate	0.455
Cantwell	Latino	Map 1	2018	U.S. Senate	0.545
Hutchinson	White	Map 2	2018	U.S. Senate	0.455
Cantwell	Latino	Map 2	2018	U.S. Senate	0.545
Hutchinson	White	Map 3	2018	U.S. Senate	0.455
Cantwell	Latino	Map 3	2018	U.S. Senate	0.545
Hutchinson	White	Map 4	2018	U.S. Senate	0.455
Cantwell	Latino	Map 4	2018	U.S. Senate	0.545
Hutchinson	White	Map 5	2018	U.S. Senate	0.460
Cantwell	Latino	Map 5	2018	U.S. Senate	0.540
Trump	White	Map 1	2016	President	0.406
Clinton	Latino	Map 1	2016	President	0.538
Bryant	White	Map 1	2016	Governor	0.423
Inslee	Latino	Map 1	2016	Governor	0.577
Vance	White	Map 1	2016	US Senate	0.383
Murray	Latino	Map 1	2016	US Senate	0.617
Trump	White	Map 2	2016	President	0.406

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Candidate	Preferred_Candidate	Map	Year	Contest	Vote
Clinton	Latino	Map 2	2016	President	0.538
Bryant	White	Map 2	2016	Governor	0.423
Inslee	Latino	Map 2	2016	Governor	0.577
Vance	White	Map 2	2016	US Senate	0.383
Murray	Latino	Map 2	2016	US Senate	0.617
Trump	White	Map 3	2016	President	0.410
Clinton	Latino	Map 3	2016	President	0.532
Bryant	White	Map 3	2016	Governor	0.427
Inslee	Latino	Map 3	2016	Governor	0.573
Vance	White	Map 3	2016	US Senate	0.386
Murray	Latino	Map 3	2016	US Senate	0.614
Trump	White	Map 4	2016	President	0.410
Clinton	Latino	Map 4	2016	President	0.532
Bryant	White	Map 4	2016	Governor	0.427
Inslee	Latino	Map 4	2016	Governor	0.573
Vance	White	Map 4	2016	US Senate	0.386
Murray	Latino	Map 4	2016	US Senate	0.614
Trump	White	Map 5	2016	President	0.410
Clinton	Latino	Map 5	2016	President	0.528
Bryant	White	Map 5	2016	Governor	0.428
Inslee	Latino	Map 5	2016	Governor	0.572
Vance	White	Map 5	2016	US Senate	0.393
Murray	Latino	Map 5	2016	US Senate	0.607

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