**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COAKLEY PENDERGRASS, *et al.*,	
Plaintiffs,	
v.	CIVIL ACTION
BRAD RAFFENSPERGER, *et al.*,	FILE NO. 1:21-CV-05339-SCJ
Defendants.	

**DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS'
STATEMENT OF ADDITIONAL MATERIAL FACTS**

Defendants Brad Raffensperger, in his official capacity as Secretary of

State; and State Election Board Members William S. Duffey, Sara Tindall

Ghazal, Janice Johnston, Edward Lindsey, and Matthew Mashburn, also in

their official capacities (collectively, "Defendants"), pursuant to Federal Rule

of Civil Procedure 56 and Local Civil Rule 56.1(B)(3), provide their Responses

and Objections to Plaintiffs' Statement of Additional Material Facts [Doc.

189-2] ("SAMF"), showing the Court the following:

1.   When asked in his deposition whether he "display[ed] racial

demographic information on the screen at any point" while he "work[ed] on

the illustrative plans [he] created in this case," Plaintiffs' mapping expert,

William Cooper, responded, "Sometimes I had demographic information

displayed, either through the data view that is part of the Maptitude

software indicating what the population is in a particular district and break

out the race of the component parts. . . . I think I mentioned in my last

testimony that I used sometimes little dots showing where the minority

population is concentrated. So I was aware of that." Ex. 7 ("Cooper Dep.") at

24:12–25:6.2

RESPONSE: Defendants admit that the Court may consider this

evidence for purposes of the summary judgment motion.

2.   When asked in his deposition about maximizing majority-Black

districts, Mr. Cooper responded, "When I draw plans, I'm always trying to

balance traditional redistricting principles. So I would never have that as a

goal unless it was just some sort of hypothetical example to show what could

be drawn, perhaps even showing that well, it could be drawn, but it would

violate traditional redistricting principles." Cooper Dep. 18:18–19:18.

RESPONSE: Objection. The evidence cited does not support the fact

stated in that Mr. Cooper could not explain how he sought to abide by

traditional redistricting principles when creating his illustrative plan.

Deposition of William Cooper [Doc. 167] ("Cooper Dep.") 28:1-29:2, 29:8-30:18,

31:18-32:22, 33:23-34:9, 34:10-35:14, 68:15-71:20, 73:13-74:7.

3.   Mr. Cooper was asked to "determine whether the African American population in Georgia is 'sufficiently large and geographically compact' to allow for the creation of an additional majority-Black congressional district in the Atlanta metropolitan area." Ex. 1 ("Cooper Report") ¶ 8 (footnotes omitted).

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

4.   Mr. Cooper concluded that "[t]he Black population in metropolitan Atlanta is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district anchored in Cobb, Douglas, and Fulton Counties (CD 6 in the Illustrative Plan) consistent with traditional redistricting principles." Cooper Report ¶ 10.

RESPONSE: Objection. The evidence cited does not support the fact stated in that Mr. Cooper could not explain how he sought to abide by traditional redistricting principles when creating his illustrative plan. Cooper Dep. 28:1-29:2, 29:8-30:18, 31:18-32:22, 33:23-34:9, 34:10-35:14, 68:15-71:20, 73:13-74:7.

5.   Mr. Cooper reported that, "[i]n drafting the Illustrative Plan, I sought to minimize changes to the 2021 Plan while abiding by all of the

traditional redistricting principles listed above. I balanced all of these considerations, and no one factor predominated in my drawing of the Illustrative Plan." Cooper Report ¶ 50.

RESPONSE: Objection. The evidence does not support the fact stated in that Mr. Cooper could not explain how he sought to abide by traditional redistricting principles when creating his illustrative plan. Cooper Dep. 28:1-29:2, 29:8-30:18, 31:18-32:22, 33:23-34:9, 34:10-35:14, 68:15-71:20, 73:13-74:7.

6. Mr. Cooper's illustrative Congressional District 6 has a total population of 765,137 people. Cooper Report fig.11.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

7. As in the enacted congressional plan, population deviations in Mr. Cooper's illustrative plan are limited to plus-or-minus one person from the ideal district population of 765,136. Cooper Report ¶ 53, fig.11; Ex. 9 ("Morgan Dep.") at 62:4–7 (not disputing that Mr. Cooper's illustrative congressional plan achieves population equality).

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

8.   The districts in Mr. Cooper's illustrative congressional plan are contiguous. Cooper Report ¶ 52; Morgan Dep. 62:14–17 (not disputing that districts in Mr. Cooper's illustrative congressional plan are contiguous).

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

9.   The average and low compactness scores of Mr. Cooper's illustrative congressional plan are similar or identical to the corresponding scores for the enacted congressional plan and Georgia's prior congressional plan, and within the norm for plans nationwide. Cooper Report ¶ 78 & n.12, fig.13; Ex. 5 ("Morgan Report") ¶ 22 (agreeing that "Cooper [] congressional plan has similar mean compactness scores to the 2021 enacted plan"); Morgan Dep. 55:18–57:5 (agreeing that Mr. Cooper's illustrative congressional plan has similar mean compactness scores to enacted congressional plan and same mean Polsby-Popper score as enacted congressional plan).

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and the evidence cited does not support the fact as to the low compactness scores because there is no definition of the term "within the norms."

10.   The following table compares the compactness scores for Mr.

Cooper's illustrative congressional plan, the enacted congressional plan, and

the state's prior congressional plan adopted in 2012:

	Reock		Polsby-Popper	
	Mean	Low	Mean	Low
Illustrative Plan	.43	.28	.27	.18
Enacted Plan	.44	.31	.27	.16
Prior Plan	.45	.33	.26	.16

Cooper Report ¶ 79, fig.13.

RESPONSE: Defendants admit that the Court may consider this

evidence for purposes of the summary judgment motion.

11.   The Reock score for Mr. Cooper's illustrative Congressional

District 6 is 0.45, which is more compact than the average Reock score of the

enacted congressional plan (0.44) and the Reock score of the enacted

Congressional District 6 (0.42). Cooper Report Exs. L-1 & L-3; Morgan Dep.

57:15–59:6 (agreeing that Mr. Cooper's illustrative Congressional District 6

scores 0.03 higher on Reock scale than enacted Congressional District 6).

RESPONSE: Defendants admit that the Court may consider this

evidence for purposes of the summary judgment motion.

12.   The Polsby-Popper score for Mr. Cooper's illustrative Congressional District 6 is 0.27, which is as compact as the average Polsby-Popper score of the enacted congressional plan (0.27) and more compact than the Polsby-Popper score of the enacted Congressional District 6 (0.20). Cooper Report Exs. L-1 & L-3; Morgan Dep. 59:7–60:2 (agreeing that Mr. Cooper's illustrative Congressional District 6 scores 0.07 higher on Polsby-Popper scale than enacted Congressional District 6).

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

13.   Mr. Cooper's illustrative congressional plan is comparable to—if not better than—the enacted congressional plan and prior congressional plan in terms of split counties and municipalities and county, municipality, and VTD splits. Cooper Report ¶ 81, fig.14.

RESPONSE: Objection. The evidence cited does not support the fact stated because it offers no opinion about how comparable to or better than the various plans are in the number of split jurisdictions. Further, the fact does not comply with LR 56.1(B)(1) because it is stated as argument rather than as a statement of fact by making judgments about which plan is "better" than other plans on certain metrics.

14.   The following table compares political subdivision splits
(excluding unpopulated areas) for Mr. Cooper's illustrative congressional
plan, the enacted congressional plan, and the prior congressional plan:

	Split Counties	County Splits	Split Cities/Towns	City/Town Splits	VTD Splits
Illustrative Plan	15	18	37	78	43
Enacted Plan	15	21	43	91	46
Prior Plan	16	22	40	85	43

Cooper Report ¶ 81, fig.14.

RESPONSE: Defendants admit that the Court may consider this
evidence for purposes of the summary judgment motion.

15.   Although both Mr. Cooper's illustrative congressional plan and
the enacted congressional plan split 15 counties, the illustrative plan scores
better across the other four categories: county splits (i.e., unique
county/district combinations), split municipalities, municipality splits (i.e.,
unique municipality/district combinations), and VTD splits. Cooper Report ¶
82, fig.14; Morgan Report ¶ 20 (agreeing that "[t]he Cooper [] congressional
plan splits the same number of counties as the 2021 adopted congressional
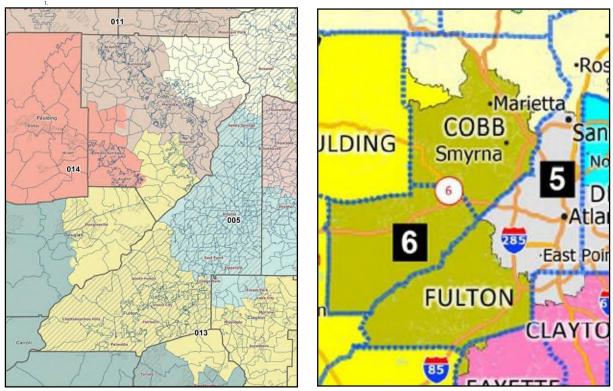plan at 15"); Morgan Dep. 44:6–46:16, 54:7–11, 54:18–55:6 (not disputing

numbers of split counties, county splits, split cities/towns, city/town splits,

and VTD splits reported by Mr. Cooper).

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1)

because it is not separately numbered and is stated as argument rather than

as a statement of fact by making judgments about which plan is "better" than

other plans on certain metrics.

16.   Mr. Cooper's illustrative plan splits majority-non-white Cobb

County among three congressional districts, whereas the enacted

congressional plan divides the county among four, including three majority-

white districts—Congressional Districts 6, 11, and 14:

Enacted Plan   *Mr. Cooper's Illustrative Plan*

Cooper Report ¶¶ 60, 65, 73, fig.14, Exs. G & H-1.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

17.   Mr. Cooper's illustrative Congressional District 6 unites Atlanta-area urban, suburban, and exurban voters, whereas the enacted congressional plan combines Appalachian north Georgia with the Atlanta suburbs. Cooper Report ¶ 68.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered. Further, this fact is refuted by Mr.

Cooper's testimony that the western part of Douglas County, which he

included in Illustrative District 6, is rural. Cooper Dep. 54:6-20.

18.   Mr. Cooper's illustrative congressional plan combines voters in

the western Atlanta metropolitan area: Illustrative Congressional District 6

unites all or part of Cobb, Douglas, Fulton, and Fayette counties, all of which

are core counties under the Atlanta Regional Commission. Cooper Report ¶

68.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1)

because it is not separately numbered. Further, this fact is refuted by Mr.

Cooper's testimony that the western part of Douglas County, which he

included in Illustrative District 6, is rural. Cooper Dep. 54:6-20.

19.   Mr. Cooper explained that "it simply makes more sense to anchor

Illustrative CD 6 in the western part of Metro Atlanta. As the Illustrative

Plan demonstrates, CD 6 can be drawn in a compact fashion that keeps

Atlanta-area urban/suburban/exurban voters together. In sharp contrast, the

2021 Plan—its treatment of Cobb County in particular—inexplicably mixes

Appalachian North Georgia with urban/suburban Metro Atlanta. In some

redistricting plans, it might be necessary to mix urban and rural voters in a

sprawling congressional district. But that is not the case here: Cobb County

can be combined in a congressional district with all or part of Douglas,

Fulton, and Fayette Counties, all of which are core Metro Atlanta counties under the Atlanta Regional Commission map. Illustrative CD 6 thus unites Georgians in the Metro Atlanta area with shared interests and concerns." Cooper Report ¶ 68.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered. Further, this fact is refuted by Mr. Cooper's testimony that the western part of Douglas County, which he included in Illustrative District 6, is rural. Cooper Dep. 54:6-20.

20.   Plaintiffs' quantitative expert, Dr. Maxwell Palmer, found strong evidence of racially polarized voting across the focus area he examined and in each of Congressional Districts 3, 6, 11, 13, and 14. Ex. 2 ("Palmer Report") ¶ 7; Ex. 3 ("Suppl. Palmer Report") ¶ 4; Ex. 6 ("Alford Report") at 3 ("As evident in Dr. Palmer's [reports], the pattern of polarization is quite striking."); Ex. 10 ("Alford Dep.") at 44:8–16, 45:10–12 ("This is clearly polarized voting, and the stability of it across time and across office and across geography is really pretty remarkable.").

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) to the extent the term "racial polarization" is a legal conclusion as distinct from the mere observation using statistical analysis that two races are voting cohesively for different candidates in a given election.

21.   Black voters in Georgia are extremely cohesive, with a clear candidate of choice in all 40 elections Dr. Palmer examined. Palmer Report ¶ 16, figs.2 & 3, tbl.1; Suppl. Palmer Report ¶ 5, fig.1, tbl.1; Alford Report 3 ("Black voter support for their preferred candidate is typically in the 90 percent range and scarcely varies at all across the ten years examined from 2012 to 2022. Nor does it vary in any meaningful degree from the top of the ballot elections for U.S. President to down- ballot contests like Public Service Commissioner."); Alford Dep. 37:13–15 (agreeing with Dr. Palmer's conclusion that Black Georgians are politically cohesive).

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

22.   On average, across the focus area, Black voters supported their candidates of choice with 98.4% of the vote in the 40 elections Dr. Palmer examined. Palmer Report ¶¶ 7, 16.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

23.   Black voters are also extremely cohesive in each congressional district that comprises the focus area, with a clear candidate of choice in all 40 elections Dr. Palmer examined. Palmer Report ¶ 19, fig.4, tbls.2, 3, 4, 5 & 6.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

24.   On average, in the 40 elections Dr. Palmer examined, Black voters supported their candidates of choice with 97.2% of the vote in Congressional District 3, 93.3% in Congressional District 6, 96.1% in Congressional District 11, 99.0% in Congressional District 13, and 95.8% in Congressional District 14. Palmer Report ¶ 19.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

25.   White voters in Georgia, by contrast, are highly cohesive in voting in opposition to the Black-preferred candidate in every election Dr. Palmer examined. Palmer Report ¶ 17, figs.2 & 3, tbl.1; Suppl. Palmer Report ¶ 5, fig.1, tbl.1; Alford Report 3 (noting that "estimated white voter opposition to the Black-preferred candidate is typically above 80 percent" and is "remarkably stable"); Alford Dep. 38:20–39:8 (agreeing that white voters generally vote in opposition to Black voters, which can operate to defeat minority-preferred candidates).

RESPONSE: Objection, the evidence cited does not support the fact stated as in some instances in CD 6, as many as 32% of white voters support the Black preferred candidate (as measured within the confidence intervals

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provided). Thus, just 68% of white voters are voting in opposition to the Black-preferred candidate. This is not what one would consider "highly cohesive voting" by white voters. Palmer Report, tbl 3.

26.   On average, across the focus area, white voters supported Black-preferred candidates with only 12.4% of the vote, and in no election that Dr. Palmer examined did this estimate exceed 17%. Palmer Report ¶¶ 7, 17.

RESPONSE: Objection, the evidence cited does not support the fact stated as in some instances in CD 6, as many as 32% of white voters support the Black preferred candidate (as measured within the confidence intervals provided). Thus, just 68% of white voters are voting in opposition to the Black-preferred candidate. This is not what one would consider "highly cohesive voting" by white voters. Palmer Report, tbl 3.

27.   White voters are also highly cohesive in voting in opposition to the Black-preferred candidate in each district that comprises the focus area. Palmer Report ¶ 20, fig.4, tbls.2, 3, 4, 5 & 6.

RESPONSE: Objection, the evidence cited does not support the fact stated as in some instances in CD 6, as many as 32% of white voters support the Black preferred candidate (as measured within the confidence intervals provided). Thus, just 68% of white voters are voting in opposition to the

Black-preferred candidate. This is not what one would consider "highly cohesive voting" by white voters. Palmer Report, tbl 3.

28.   On average, in the 40 elections Dr. Palmer examined, white voters supported Black-preferred candidates with 6.7% of the vote in Congressional District 3, 20.2% in Congressional District 6, 16.1% in Congressional District 11, 15.5% in Congressional District 13, and 10.3% in Congressional District 14. Palmer Report ¶ 20.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

29.   Defendants' quantitative expert, Dr. John Alford, explained that the data "doesn't demonstrate that" partisan behavior is not "actually being driven by racial considerations." Alford Dep. 109:15–111:1.

RESPONSE: Objection. The evidence cited does not support the fact stated because Dr. Alford went on to explain that the race of the candidate still matters when reviewing partisan behavior. Alford Dep. 111:3-113:4.

30.   Dr. Alford acknowledged that the race of candidates is not the only role race might play in a voter's decision and that race likely plays a role in shaping voters' party preferences. Alford Dep. 99:14–100:7, 134:19–135:18 ("[T]here's certainly room for race to be involved in decision-making in a wide variety of ways.").

RESPONSE: Objection, the evidence cited does not support the fact. Dr. Alford acknowledged that race might play a role in a voter's decision process beyond the race of the candidate, but did not say that it was "likely." Rather, he explained that it could be possible, but there was no evidence in Plaintiffs' expert report on racial polarization that indicated it did in any way. Alford Dep. 99:18-100:7; 135:1-18.

31.   Dr. Alford did not explore the role of race in shaping political behavior, either generally or in this case. Alford Dep. 12:15–18, 115:12–116:10, 132:8– 133:15.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

32.   Dr. Alford acknowledged that he could not draw conclusions about the causes of voting behavior based only on the results of Dr. Palmer's ecological inference analysis. Alford Dep. 82:17–84:14, 90:4–91:9 ("EI is never going to answer a causation question   Establishing causation is a very difficult scientific issue[.]").

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

33.   Plaintiffs' Senate Factors expert, Dr. Orville Vernon Burton, explored the relationship between race and partisanship in Georgia politics. Ex. 4 ("Burton Report") at 57–62.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

34.   Dr. Alford did not review Dr. Burton's analysis. Alford Dep. 16:3–14.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

35.   As Dr. Burton explained, "[s]ince Reconstruction, conservative whites in Georgia and other southern states have more or less successfully and continuously held onto power. While the second half of the twentieth century was generally marked by a slow transition from conservative white Democrats to conservative white Republicans holding political power, the reality of conservative white political dominance did not change." Burton Report 57.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and because it is stated as argument rather than as a statement of fact.

36.   Notably, the Democratic Party's embrace of civil rights legislation— and the Republican Party's opposition to it—was the catalyst of this political transformation, as the Democratic Party's embrace of civil rights policies in the mid-20th century caused Black voters to leave the Republican Party (the "Party of Lincoln") for the Democratic Party. Burton Report 57–58.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

37.   In turn, the Democratic Party's embrace of civil rights legislation sparked what Earl Black and Merle Black describe as the "Great White Switch," in which white voters abandoned the Democratic Party for the Republican Party. Burton Report 58.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

38.   The 1948 presidential election illustrated this phenomenon: South Carolina Governor J. Strom Thurmond mounted a third-party challenge to Democratic President Harry Truman in protest of Truman's support for civil rights, including his integration of the armed forces. Thurmond ran on the ticket of the so- called Dixiecrat Party, which claimed the battle flag of the Confederacy as its symbol. Thurmond's campaign ended

Democratic dominance of Deep South states by winning South Carolina, Alabama, Mississippi, and Louisiana. Burton Report 58.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

39.   This trend continued into the 1964 and 1968 elections. In 1964, the Republican nominee, Barry Goldwater, won only six states in a landslide defeat to President Lyndon B. Johnson: his home state of Arizona and all five states comprising the Deep South (South Carolina, Georgia, Alabama, Mississippi, and Louisiana). Goldwater was the first Republican presidential candidate to win Georgia's electoral votes. Burton Report 58.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

40.   Goldwater told a group of Republicans from Southern states that it was better for the Republican Party to forgo the "Negro vote" and instead court white Southerners who opposed equal rights. Burton Report 59.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

41.   Four years later, Georgia's electoral votes were won by George Wallace, another third-party presidential candidate who ran on a platform of vociferous opposition to civil rights legislation. Burton Report 58.

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RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

42.   The effectiveness of what was called the "Southern strategy" during Richard Nixon's presidency had a profound impact on the development of the nearly all-white modern Republican Party in the South. Burton Report 59.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and it is based on hearsay, which cannot be considered at summary judgment. Fed. R. Evid. 802; *Macuba v. DeBoer*, 193 F.3d 1316, 1322 (11th Cir. 1999); *Dallas Cty. v. Commercial Union Assur. Co.*, 286 F.2d 388, 391-92 (5th Cir. 1961) ("Of course, a newspaper article is hearsay, and in almost all circumstances is inadmissible.").

43.   Matthew D. Lassiter, an historian of the Atlanta suburbs, observed that "the law-and-order platform at the center of Nixon's suburban strategy tapped into Middle American resentment toward antiwar demonstrators and black militants but consciously employed a color-blind discourse that deflected charges of racial demagoguery." Burton Report 60 (quoting Matthew D. Lassiter, The Silent Majority: Suburban Politics in the Sunbelt South 234 (2006)).

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and is hearsay, which cannot be considered at summary judgment. Fed. R. Evid. 802; *Macuba v. DeBoer*, 193 F.3d 1316, 1322 (11th Cir. 1999); *Schafer v. Time, Inc.*, 142 F.3d 1361, 1374 (11th Cir. 1998).

44.   As Dr. Burton concluded, "[w]hite southerners abandoned the Democratic Party for the Republican Party because the Republican Party identified itself with racial conservatism. Consistent with this strategy, Republicans today continue to use racialized politics and race-based appeals to attract racially conservative white voters." Burton Report 59.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered.

45.   The significant impact of race on Georgia's partisan divide can be further seen in the opposing positions taken by officeholders in the two major political parties on issues inextricably linked to race; for example, the Democratic and Republican members of Georgia's congressional delegation consistently oppose one another on issues relating to civil rights, based on a report prepared by the NAACP. Burton Report 74–75.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and is hearsay, which cannot be

considered at summary judgment. Fed. R. Evid. 802; *Macuba v. DeBoer*, 193

F.3d 1316, 1322 (11th Cir. 1999); *Schafer v. Time, Inc.*, 142 F.3d 1361, 1374

(11th Cir. 1998).

46.   In a poll of 3,291 likely Georgia voters conducted just before the

2020 election, among voters who believed that racism was the most

important issue facing the country, 78% voted for Joe Biden and 20% voted

for Donald Trump; among voters who believed that racism was "not too or not

at all serious," 9% voted for Biden and 90% voted for Trump; and among

voters who believed that racism is a serious problem in policing, 65% voted

for Biden and 33% voted for Trump. Burton Report 76.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1)

because it is not separately numbered and is hearsay, which cannot be

considered at summary judgment. Fed. R. Evid. 802; *Macuba v. DeBoer*, 193

F.3d 1316, 1322 (11th Cir. 1999); *Schafer v. Time, Inc.*, 142 F.3d 1361, 1374

(11th Cir. 1998).

47.   The Pew Research Center found a similar divergence on racial

issues between Democratic and Republican voters nationwide. Burton Dec.

75–76.

RESPONSE: Objection. The fact relied on is inadmissible because it is

hearsay, which cannot be considered at summary judgment. Fed. R. Evid.

802; *Macuba v. DeBoer*, 193 F.3d 1316, 1322 (11th Cir. 1999); *Schafer v. Time, Inc.*, 142 F.3d 1361, 1374 (11th Cir. 1998).

48.   Dr. Burton further noted that while "Republicans nominated a Black candidate—Herschel Walker, a former University of Georgia football legend—to challenge Senator Raphael Warnock in the 2022 general election for U.S. Senate[,] Walker's nomination only underscores the extent to which race and partisanship remain intertwined. Republican leaders in Georgia admittedly supported Walker because they wanted to 'peel[] off a handful of Black voters' and 'reassure white swing voters that the party was not racist.'" Burton Report 61 (quoting Cleve R. Wootson Jr., Herschel Walker's Struggles Show GOP's Deeper Challenge in Georgia, Wash. Post, https://www.washingtonpost.com/politics/2022/09/22/ herschel-walker-georgia-black-voters (Sept. 22, 2022)).

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and is hearsay, which cannot be considered at summary judgment. Fed. R. Evid. 802; *Macuba v. DeBoer*, 193 F.3d 1316, 1322 (11th Cir. 1999); *Dallas Cty. v. Commercial Union Assur. Co.*, 286 F.2d 388, 391-92 (5th Cir. 1961) ("Of course, a newspaper article is hearsay, and in almost all circumstances is inadmissible.").

49.   Dr. Burton explained that racial bloc voting "is so strong, and race and partisanship so deeply intertwined, that statisticians refer to it as multicollinearity, meaning one cannot, as a scientific matter, separate partisanship from race in Georgia elections." Burton Report 61.

RESPONSE: Objection. The fact does not comply with LR 56.1(B)(1) because it is not separately numbered and Defendants object to whether Dr. Burton is qualified to provide that opinion.

50.   Georgia's enacted congressional plan includes two majority-Black districts based on percentage Black voting-age population, three majority-Black districts based on percentage non-Hispanic Black citizen voting-age population, and four majority-Black districts based on percentage non-Hispanic DOJ Black citizen voting-age population. Cooper Report ¶ 73, fig.14.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

51.   Georgia has a total voting-age population of 8,220,274, of whom 2,607,986 (31.73%) are AP Black. Cooper Report ¶ 18, fig.2.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

52.   The total estimated citizen voting-age population in Georgia in 2021 was 33.3% AP Black. Cooper Report ¶ 20, fig.2.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

53.   Only 49.96% of Black voters in Georgia reside in majority-Black districts under the enacted congressional plan, while 82.47% of non-Hispanic white voters live in majority-white districts—a difference of 32.51 percentage points. Cooper Report ¶ 74, fig.15.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

54.   Under Mr. Cooper's illustrative congressional plan, 57.48% of the Black voting-age population resides in majority-Black districts, while 75.50% of the non-Hispanic white voting-age population resides in majority-white districts—a difference of 18.01 percentage points. Cooper Report ¶ 74, fig.15.

RESPONSE: Defendants admit that the Court may consider this evidence for purposes of the summary judgment motion.

        Respectfully submitted this 3rd day of May, 2023.

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<u>CERTIFICATE OF COMPLIANCE</u>

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing Statement has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

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<u>/s/ Bryan P. Tyson</u>

Bryan P. Tyson

</div>

EXHIBIT A

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Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

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1   UNITED STATES DISTRICT COURT
          FOR THE NORTHERN DISTRICT OF GEORGIA
2   ATLANTA DIVISION

3

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)
5   COAKLEY PENDERGRASS, ET AL.,   ) CIVIL ACTION NO.
) 1:21-CV-05339-SCJ
6   PLAINTIFFS,   )
)
7   v.   )
)
8   BRAD RAFFENSPERGER, ET AL.,   )
)
9   DEFENDANTS.   )

10

11

12

13   DEPOSITION OF WILLIAM S. COOPER
14   (TAKEN by DEFENDANTS)
15   ATTENDING VIA ZOOM IN BRISTOL, VIRGINIA
16   FEBRUARY 14, 2023
17

18

19

20   REPORTED BY: Meredith R. Schramek
                       Registered Professional Reporter
21   Notary Public
                       (Via Zoom in Mecklenburg County,
22   North Carolina)

23

24

25

 1   Q   So if a plan split fewer counties than your

 2   illustrative plan, you wouldn't say that your

 3   illustrative plan was inconsistent with the principle

 4   of keeping jurisdictions whole?

 5   A   No.   Because you're constantly balancing

 6   things.

 7   Q   And so there's -- for Georgia, there's no

 8   objective number of county splits that makes a plan

 9   consistent with the traditional principle of keeping

10   counties whole; is that right?

11   A   Well, ultimately, there would be. But I --

12   you know, it's difficult to give you a number because

13   there are some very small counties and some large

14   counties and so it could vary. And -- so I'm unable to

15   tell you exactly what the threshold would be.

16   I've -- in the latest plan, the plan that's

17   part of my November 2020 -- December 2022 declaration,

18   I've split one fewer county -- or one less county. And

19   there are, I think, 18 county splits total compared to

20   21 in the state plan.

21   So I assume that's sufficient since I've

22   been -- done better than the State did in that respect.

23   Q   But you wouldn't say that the State's plan

24   was inconsistent with the traditional principle of

25   keeping counties whole just because your plan splits

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1   one fewer, would you?

2   A   No.

3   Q   On that --

4   A   Just looking at -- from the perspective of

5   splits of political subdivisions, no.

6   Q   Okay. You mentioned the compactness scores

7   and the compactness of the districts.

8   How do you determine that a plan is

9   consistent with the traditional redistricting principle

10   of compactness?

11   A   Well, that's very tricky because states and

12   towns and precincts can have odd shapes and so that

13   would vary from state to state and district to

14   district. A coastal district, for example, might score

15   very low on Polsby-Popper because of all the ins and

16   outs of a coastline or a river.

17   So it's a very -- it seems to be an objective

18   score, but it ends up being so much subjective in terms

19   of how you interpret it. But I don't think there's any

20   question that the illustrative plan I've drawn is

21   acceptable in terms of compactness based on the Reock

22   and Polsby-Popper scores.

23   Q   Is there a range for the Reock and

24   Polsby-Popper scores that is unacceptable for

25   compactness?

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1   A   There is not necessarily. I do think that at

2   some point, at least in terms of drawing districts that

3   are not affected by a coastline or a municipal boundary

4   or some other potential subdivision like a precinct,

5   that once you get into the low single digits, become

6   somewhat problematic.

7   But you can have situations like, say, the

8   infamous "snake on the lake" in Ohio that stretches --

9   it was the old snake on the lake that went from

10   downtown Cleveland all the way to Toledo, a narrow

11   strip of land along the lake. It actually had a very

12   high Polsby-Popper score, and that was, of course, very

13   misleading and that was because it had precincts that

14   extended out into Lake Erie because a couple of those

15   islands in the lake are populated. So that "snake on

16   the lake" congressional district had a reasonably high

17   compactness score even though it was not at all

18   compact.

19   Q   Do you use or display the Reock and

20   Polsby-Popper scores on the screen as you're drawing a

21   plan, or do you just check them once the plan is

22   complete?

23   A   I will look at them occasionally, but I don't

24   routinely check them. The latest version of Maptitude

25   does allow you to do that from the data view, but I

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 1   basically just ignore that until I'm interested.

 2   Q   So within Maptitude, you don't use the

 3   display of the compactness score as you're drawing?

 4   You have to stop and run a report to see that

 5   information?

 6   A   Well, it's there. But normally I would just

 7   run the report because I use just visual assessments

 8   basically as I'm drawing a plan so that I would

 9   hopefully check it if I thought the plan was starting

10   to look a little strange. So needless to say, with

11   respect to this congressional plan, I never checked it

12   because it looks good from the start.

13   Q   And I believe we discussed the traditional

14   redistricting principle of incumbency doesn't really

15   apply on a congressional plan because incumbents can

16   live anywhere in the state; right?

17   A   That's my understanding.

18   Q   And so when you say in paragraph 10 that this

19   district is "consistent with traditional redistricting

20   principles," the new district, are you saying anything

21   beyond it splits a similar number of counties, it has a

22   similar compactness score, and its equal population to

23   other districts in the state?

24   A   Well, as I've mentioned, one must factor

25   in -- I mean, again, this is very subjective --

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 1    cultural and historical information and, above all, of

 2    course, one must take into account minority voting

 3    strengths and whether or not the plan is, you know, not

 4    protecting minorities under Section 2.

 5         Q    Okay.  So you referenced historical and

 6    cultural connections.  Do I have that right?

 7         A    Yes, generally speaking.

 8         Q    Okay.  How do you determine if a plan is

 9    consistent with the traditional principle of historical

10    and cultural connections?

11         A    It's subjective.  I mean, it's a community of

12    interest, which is entirely subjective.  I think I've

13    likened it to pinning Jell-O to a wall because everyone

14    can have a different definition.

15         Q    So your determination that your plan complies

16    with the traditional principle of maintaining

17    historical and cultural connections is just your view

18    and there's not a specific definition for how that

19    complies?

20         A    I don't think there would be a specific

21    definition, no.  It's very general.  And different

22    people can come to different conclusions, obviously.

23         Q    You also referenced minority voting strength

24    as a traditional redistricting principle.

25              How do you go about determining that the
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1   illustrative plan complies with the traditional

2   principle of maintaining minority voting strength?

3   A   Or not diluting minority voting strengths?

4   Q   Or not diluting.

5   A   Well, to a large degree, I would rely on the

6   attorneys' interpretation of the statistical work done

7   by the individual who's working on the Gingles 2 and

8   Gingles 3 analysis, expert analysis.

9   Q   So as a map drawer, are there any steps you

10   take apart from reliance on the attorneys for

11   maintaining the traditional principle of not diluting

12   minority voting strength?

13   A   Well, I mean, just my general background

14   depending on the circumstances. I mean, in Georgia I

15   know, for example, that there are two districts that

16   are actually slightly under 50 percent black voting age

17   population, District 2 and District 5. So it would

18   appear in Metro Atlanta, a district that is around

19   50 percent black is a competitive district that could

20   be a so-called minority opportunity district. That

21   might not be the case in the delta of Mississippi, but

22   it just depends.

23   Q   And specifically for District 6 -- again, not

24   asking for anything that you relied on the lawyers for

25   in this case, but as a map drawer, did you determine

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1    that the dilution of minority voting strength was met

2    as a traditional principle because District 6 was over

3    50 percent?

4        A    Well, yes.  It's over 50 percent.  And so for

5    that reason, along with evidence that minorities have

6    been elected even in districts that are under

7    50 percent, I reached that conclusion, which was

8    confirmed, I suppose, in the Gingles 2 and Gingles 3

9    analysis in this case.

10       Q    So, again, kind of getting back to your

11   conclusion that the new CD 6 is drawn consistent with

12   traditional redistricting principles, what you mean by

13   the phrase "consistent with traditional redistricting

14   principles" is that it meets population equality by

15   being plus or minus zero, it splits a number of

16   counties and precincts similar to the enacted plan, the

17   compactness scores are similar to the enacted plan, in

18   your opinion, historical and cultural connections are

19   maintained, and the district is over 50 percent black

20   VAP.

21            Is there anything else that is included in

22   the phrase "consistent with traditional redistricting

23   principles" in paragraph 10?

24       A    Well, reasonably shaped and compact.  I don't

25   think you mentioned that.  And the district should be
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1   contiguous unless the jurisdiction in question is not

2   contiguous. So those are other factors that I took

3   into consideration.

4   Q   On any other factors that you took into

5   consideration that we've not talked about that are

6   included in that phrase "consistent with traditional

7   redistricting principles"?

8   A   I think we've covered them, but I reserve the

9   right to interject another one if I suddenly think that

10   maybe we didn't.

11   Q   Understood. But as of right now, you can't

12   think of another one; is that right?

13   A   As of right now, I don't have any other one

14   top of mind.

15   Q   Let's go next to paragraph 11 of your report.

16   And you reference that you don't change districts -- 6

17   of the 14 districts on the enacted 2021 plan; correct?

18   A   Correct.

19   Q   And so in order to draw the new majority

20   black Congressional District 6, you've had to change,

21   on the illustrative plan, 8 of the 14 districts from

22   the enacted plan; right?

23   A   I don't know if I had to change eight, but --

24   I suppose it's possible I could have changed fewer than

25   eight. I don't know.

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1   A   I think it's synonymous.

2   Q   Synonymous? So it's the same thing?

3   A   Yes.

4   Q   And then I know we talked about communities

5   of interest a little while ago.

6   Looking at illustrative District 6 in

7   Figure 10 there on page 20, what are the communities of

8   interest that you can identify located in illustrative

9   District 6?

10   A   Well, illustrative District 6 is largely

11   suburban/exurban Atlanta. So it's part of the Atlanta

12   core counties, the 11 core counties, which are also

13   part of the Atlanta MSA. So there are economic and

14   transportation commonalities there, lots of small

15   cities. It can get sort of rural once you get out into

16   western Douglas County, for example. I took a little

17   spin around the district in -- on Saturday after our

18   deposition on Friday of last week and visited parts of

19   Douglas and extended all the way -- drove actually

20   almost halfway to Villa Rica.

21   I guess you say it differently though, don't

22   you? How do you say that?

23   Q   We say "Villa Rica." That's where my Tysons

24   are from actually, is in Villa Rica.

25   A   Pardon?

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1   Hancock and other counties, Taliaferro in eastern

2   Georgia being part of a new majority black state senate

3   district that you created in one of the other cases;

4   right?

5   A   We have discussed that in the other case.

6   Q   So can you tell me what the community of

7   interest is between majority black Hancock County and

8   the Appalachian Mountains and Rabun and Towns County on

9   the North Carolina border?

10   A   Well, again, the connection is not very

11   strong, but one has to balance out the populations so

12   that you have 14 districts that are roughly 765,000

13   people. So, again, there would be other ways to draw

14   it.

15   Q   So, Mr. Cooper, when you talked about, in

16   paragraph 48, the illustrative plan adhering to

17   traditional principles and you listed the various

18   principles, it sounds like what you're saying is

19   population equality is really the most important

20   principle even more so than being able to explain where

21   there's communities of interest between different parts

22   of districts.

23   Do I have that right?

24   A   Well, actually I think you do. It's a

25   nonstarter. If it doesn't meet population equality or

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1   something very close to plus or minus one, then it's a

2   nonstarter. Right?

3   Q   And so then after population equality, what

4   other traditional redistricting principles explain the

5   configuration of District 10 on the illustrative plan?

6   A   I was following county boundaries. I think

7   there's a split of Wilkes County. And I believe

8   Lumpkin County, but there are no other county splits I

9   believe, unless -- maybe Hall County is split.

10   But I was attempting to draw a plan that was

11   reasonably compact, reasonably shaped that -- I had the

12   information about the incumbents, I think, at maybe the

13   latter stage of drawing the plan. So I was probably

14   attempting to avoid placing a couple of incumbents who

15   live very close to one another in the Jackson County

16   area, I think. I was attempting to put them, maybe, in

17   different districts even though I understand they don't

18   have to be, I believe. I'm not looking at the

19   incumbents right now and haven't done so since

20   December.

21   Q   So, Mr. Cooper, in paragraph 48, I didn't see

22   where you listed incumbents as a traditional principle

23   as part of the illustrative plan, and thought that we

24   had talked about earlier that incumbency wasn't as

25   important.

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1   Did you use incumbency data in the drawing of

2   the illustrative plan?

3   A   I was sort of aware of where I thought the

4   incumbents lived. It's always in the background. So

5   that was in the background.

6   Q   So beyond incumbency and keeping counties

7   whole minus Hall, Lumpkin, and Wilkes Counties, and

8   population equality, are there any other traditional

9   redistricting principles that went into the districting

10   of District 10?

11   A   Well, I had to make the plan reasonably

12   compact. I tried to follow county boundaries. The

13   district's contiguous. It looks as compact as the

14   districts that have been drawn in the enacted plan.

15   But it could be drawn differently.

16   Q   But you'd agree that there's not a community

17   of interest between majority black Hancock County and

18   Rabun County in extreme northwest Georgia, wouldn't

19   you?

20   A   They are different. They are different. And

21   so I am open to other suggestions for how one might

22   draw District 10.

23   Q   And I understand they're different. My

24   question was: You'd agree there's not a community of

25   interest between Hancock and Rabun counties; right?

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1   A   Well, not entirely.   Because most counties

2   are quite poor.   And in Rabun County, you'd be talking

3   about poor whites.   And in Hancock County, a fairly

4   significant black population that is not experiencing

5   prosperity.   So there are connections there.   There are

6   connections in that regard.

7   Q   So you believe a community of interest in

8   illustrative District 10 would be poor white voters in

9   the Rabun and similar socioeconomic status black voters

10   in Hancock County?

11   A   Could be.   Could be.   On certain

12   socioeconomic issues.

13   Q   Was that the community of interest you

14   considered when you drew illustrative District 10?

15   A   When I was drawing District 10, I was mainly

16   trying to avoid splitting counties and meet one person,

17   one vote requirements.   And I was aware that there are

18   different areas in the sense that Rabun County is

19   Appalachian and that parts of the southern end of

20   District 10 are in the historic black belt.

21   Q   And you'd agree that Athens and Clark County

22   is included in District 10 on the illustrative plan;

23   right?

24   A   That's right.   There's a university there.

25   Q   And --

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1   District 13 in Clayton County begins near the Atlanta

2   airport as you've drawn it?

3   A   Yes.

4   Q   And you'd agree that Butts and Jasper

5   Counties on the eastern side of District 13 as drawn

6   are rural counties; right?

7   A   They are rural, but still part of Metro

8   Atlanta. In other words, the Census Bureau has

9   determined that there's a 29-county area where there

10   are commuting and transportation ties that are

11   significant enough to put those counties into Metro

12   Atlanta.

13   Q   But you agree that District 13 as drawn

14   connects urban areas in Clayton County with rural areas

15   in Fayette, Spalding, Butts, and Jasper Counties;

16   right?

17   A   Yes.

18   Q   Are you aware that the only majority black

19   portions of any county in District 13 as drawn is the

20   portions in Clayton and Newton Counties?

21   A   Well, there's obviously black population and

22   significant black population in some of the other

23   counties. Henry County is almost majority black. It's

24   50/50. And the black population is growing. Fayette

25   County has a significant black population that is

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1   growing.

2   So I'm not -- I'm just not that focused on

3   the pieces of a particular county in terms of the

4   actual percentages involved, but I do know there's

5   significant black population in the area that comprises

6   District 13, including South Metro counties like

7   Spalding and, of course, Fayette and Henry.

8   Q   Okay. Let's take a look at that. Exhibit

9   Number I-3 of your declaration, this is the plan

10   components report for the illustrative plan; right?

11   A   Right.

12   Q   And this shows, for the portion of each

13   county located in a district, what the population and

14   racial breakdown of the portions of those counties in

15   that district is; right?

16   A   Right. And I'll stress that this was

17   reported after the plan had been completed. In other

18   words, I was focusing on what the component parts were

19   as I was drawing the plan.

20   Q   And so looking at District 13, do you agree

21   that the portion of Butts County in District 13 is

22   27.80 percent AP black VAP; right?

23   A   Right. It's a significant black population.

24   Q   Right. And Clayton, the portion in Clayton

25   is 71.9 percent AP black VAP?

EXHIBIT B

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Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

_____)

COAKLEY PENDERGRASS, et al.,   )
)
        Plaintiffs,   )
    vs.   )
) Civil Action No.
BRAD RAFFENSPERGER, in his   ) 2:21-CV-05449-SCJ
official capacity as the   )
Georgia Secretary of State,   )
et al.,   )
)
        Defendants.   )
_____)
)
ANNIE LOIS GRANT, et al.,   )
)
        Plaintiffs,   )
    vs.   ) Civil Action No.
) 1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his   )
official capacity as the   )
Georgia Secretary of State,   )
et al.,   )
)
        Defendants.   )
_____)

 Videotaped deposition of DR. JOHN ALFORD, taken
 remotely in the above-captioned cause, before
 Rachel F. Gard, CSR, RPR, CRR, commencing at
 the hour of 11:00 a.m. Eastern on Thursday,
 February 23, 2023.

_____
                DIGITAL EVIDENCE GROUP
            1730 M Street, NW, Suite 812
               Washington, D.C. 20036
                  (202) 232-0646

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 1        A  -- is a cue, doesn't mean it's a cue,

 2     therefore that creates this causal tumble or

 3     whatever.  But if the information is available to

 4     the voters, therefore it's one of the things they

 5     may be acting on because it is apparent to them

 6     and it's something they actually know about,

 7     people act on things that they don't -- that

 8     they're not cognizant of, but certainly the things

 9     they are cognizant of can be important.

10             Again, by "racial cue," I mean that

11     information is available to the voters when

12     they're making the decision, and I'm not really

13     going beyond that with the evidence we have here.

14        Q  Okay.  Would you agree that the race of a

15     candidate is not the only role race plays or race

16     might play in a voter's political behavior?

17        A  Yes.

18        Q  And, in fact, race might play -- again, we

19     don't -- kind of removing ourselves from the data

20     here and speaking more just abstractly or

21     theoretically, race might play a tremendously

22     important role in a voters' decision or how they
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1   vote or what their political beliefs are. Do you

2   think that's a fair statement?

3   MR. JACOUTOT: Object to form.

4   A We're saying it might, yes. It might; it

5   might not. I think yeah, there's certainly room

6   for race to be involved in decision-making in a

7   wide variety of ways.

8   Q And what -- and now looking at the data we

9   have in front of us, we know how -- to put it

10   plainly, we know how black voters vote in Georgia

11   and we know how white voters vote in Georgia,

12   correct?

13   A Right, in a limited sense of, you know,

14   our prediction about which candidates they prefer

15   in the general elections, yes.

16   Q But what that data does not necessarily

17   tell us is the degree to which race is influencing

18   those decisions?

19   A So yes, it does. It can answer questions

20   about all or a variety of ways in which

21   speculatively race might influence decision, but I

22   guess the way I would answer that is to say, I

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1   of other possibilities, right.

2   Q   Right.

3   A   So again, that's a different sort of scope

4   question. The question -- the question is, does

5   it in any way suggest that that might be true or

6   does it give us any sense of how likely that is.

7   And I think common sense, if you're saying

8   something as important in U.S. politics as

9   choosing a party, in choosing candidates based on

10   issues is being driven by race, right, so I'm

11   making my party choice entirely on the basis of

12   race because that's how important race is with me,

13   and then when confronted with a racially contested

14   election, it makes no difference at all.

15   So I just find -- again, this is -- you

16   think of it as sort of obvious. If Republicans

17   choose to be Republicans and it's really all about

18   being white and that being a white party that

19   doesn't support -- that doesn't support blacks,

20   then it's just really hard to get your head around

21   how they nominated Herschel Walker. I mean, it's

22   strategically hard to understand how they got

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 1   around to nominating Herschel Walker.  But

 2   racially, how is it these same voters who

 3   structure their entire political universe around

 4   race become completely indifferent to the race of

 5   candidates, right.  There may be some way for that

 6   to happen.  Again, I think you have to accept that

 7   that becomes -- it's not just -- we can never

 8   exclude all of the strange possibilities out of

 9   the world, but we can certainly assign

10   probabilities to them.

11        And if there was something going on like

12   you're suggesting, it's really hard to see why it

13   wouldn't leave any -- to continue to provide some

14   evidence of it at the level of the idea that if I

15   chose being a Democrat or a Republican on the

16   basis of race, I then would treat black and white

17   candidates with complete indifference as to race

18   seems like an odd line to draw in your political

19   universe.

20        Q  So I guess --

21        A  It's not impossible, but it's unlikely.

22   And if you think that's true, I'd suggest
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1   providing some evidence that it's true because I

2   just don't think the burden of proof strikes me

3   here not as the burden of just demonstrating that

4   something is not impossible.

5   Q   But you have done -- your expert report

6   doesn't include any opinions on these questions?

7   To put it more specifically, you have not examined

8   the reasons why voters make their decisions,

9   correct?

10   A   I think it's outside the scope of what

11 experts do in these cases, just generally, to have

12 a thing about how voters make decisions. So

13 there's some evidence here. It's exactly the sort

14 of evidence that's always in these cases, it's

15 always relies on, it's always done in reliable

16 fashion. It suggests the connections we talked

17 about.

18   And then if your question is have I tried

19 to show -- have I tried to demonstrate this

20 possible but highly unlikely other thing, have I

21 tried to find out if it is there or if I tried to

22 prove that it isn't there, I am not. I don't -- I

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 1   preference or party identification, and if the

 2   pattern that you observe indicates that

 3   polarization in Georgia is attributable to party,

 4   then it's also true, then, that that polarization

 5   might be attributable to race through party. Is

 6   that fair?

 7   MR. JACOUTOT: Object to form.

 8   A So I'll say just to make sure that I'm not

 9   quoted out of context.

10   Q Sure.

11   A Not that you would do that but somebody

12   else might. We're just restating what I think we

13   said already, is this a possibility? Yes. Is

14   this something you could do empirical work on and

15   establish? Yes. And again, is there anything in

16   Dr. Palmer's report that in any way establishes

17   that that's true in Georgia empirically? The

18   answer is no.

19   So there's not in evidence here. It's not

20   in his report. And if he puts it in his report,

21   I'd have a chance to respond to it and we can

22   debate, is this real, is it the right evidence, is

Expert Report of Dr. Maxwell Palmer

Pendergrass v. Raffensperger (N.D. Ga.)

December 12, 2022

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EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. I was promoted to Associate Professor, with tenure, in 2021. I am also a Civic Tech Fellow in the Faculty of Computing & Data Sciences and a Faculty Fellow at the Initiative on Cities. I teach and conduct research on American politics and political methodology.

2. I have published academic work in leading peer-reviewed academic journals, including the *American Political Science Review*, *Journal of Politics*, *Perspectives on Politics*, *British Journal of Political Science*, *Journal of Empirical Legal Studies*, *Political Science Research and Methods*, *Legislative Studies Quarterly*, and *Urban Affairs Review*. My book, *Neighborhood Defenders: Participatory Politics and America's Housing Crisis*, was published by Cambridge University Press in 2019. I have also published academic work in the *Ohio State University Law Review*. My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations, and data sources including academic surveys, precinct-level election results, voter registration and vote history files, and census data. My curriculum vitae is attached to this report.

3. I have served as an expert witness or litigation consultant on numerous cases involving voting restrictions. I testified at trial, court hearing, or by deposition in *Bethune Hill v. Virginia* before the U.S. District Court for the Eastern District of Virginia (No. 3:14-cv-00852-REP-AWA-BMK); *Thomas v. Bryant* before the U.S. District Court for the Southern District of Mississippi (No. 3:18-CV-00441-CWR-FKB); *Chestnut v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:18-cv-00907-KOB); *Dwight v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:18-cv-2869-RWS); *Bruni v. Hughs* before the U.S. District Court for the Southern District of Texas (No. 5:20-cv-35); *Caster v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:21-cv-1536-AMM); *Pendergrass v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:21-CV-05339-SCJ); *Grant v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:22-CV-00122-SCJ); and *Galmon v. Ardoin* before the U.S. District Court for the Middle District of Louisiana (3:22-cv-00214-SDD-SDJ). I also served as the independent racially polarized voting analyst for the Virginia Redistricting Commission in 2021, and I have worked as a consultant to the United State Department of Justice on several matters. My expert testimony has been accepted and relied upon by courts; in no case has my testimony been rejected or

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found unreliable.

4. I am being compensated at a rate of $350 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

5. I testified in this matter in the preliminary injunction proceedings on February 10, 2022. I was accepted by the court as an expert in redistricting and data analysis.

6. I was retained by the plaintiffs in this litigation to offer an expert opinion on the extent to which voting is racially polarized in Northwest Georgia. I was also asked to evaluate the performance of the 6th Congressional District in the plaintiffs' illustrative map.

7. I find strong evidence of racially polarized voting across the focus area, which is comprised of the 3rd, 6th, 11th, 13th, and 14th Congressional Districts under the 2021 redistricting map.[1] Black and White voters consistently support different candidates. On average, I estimate that 98.4% of Black voters support the same candidate, while only 12.4% of White voters support the Black-preferred candidate. I also find strong evidence of racially polarized voting in each of the five individual congressional districts.

8. Black-preferred candidates are largely unable to win elections in the focus area. Across an analysis of 40 statewide elections from 2012 to 2022, the Black-preferred candidate lost every election in the focus area. When taken on a district-by-district basis, the Black-preferred candidate was defeated in every one of the 40 elections analyzed in the 3rd, 6th, 11th, and 14th Congressional Districts. The Black-preferred candidate won a majority of the vote in the 13th Congressional District in all 40 elections.

9. Under the plaintiffs' illustrative map, I find that Black-preferred candidates are able to win elections in the new 6th Congressional District. Across 31 statewide elections from 2012 to 2021, the Black-preferred candidate won an average of 66.1% of the vote in this illustrative district.[2]

Data Sources and Elections Analyzed

10. For the purpose of my analysis, I examined elections in the 3rd, 6th, 11th, 13th, and 14th Congressional Districts, under the plan adopted by the state legislature in 2021. Collectively, I refer to this area as the "focus area." Figure 1 maps the focus area.

11. To analyze racially polarized voting, I relied on precinct-level election results and voter turnout by race, compiled by the state of Georgia. The data includes the racial breakdown of registrants and voters in each precinct, based on registrants' self-identified race when registering to vote. Data for the 2012, 2014, 2016, and 2018 general elections

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[1] In my expert report for the preliminary injunction hearing, I defined the focus area as the 3rd, 11th, 13th, and 14th Congressional Districts. I added the 6th District to the focus area in this report because the plaintiff's revised illustrative map now includes a portion of the 6th District in the new majority-minority district.

[2] As discussed below, I was not able to include the 2022 general elections in this analysis because 2022 precinct geography data was not available.
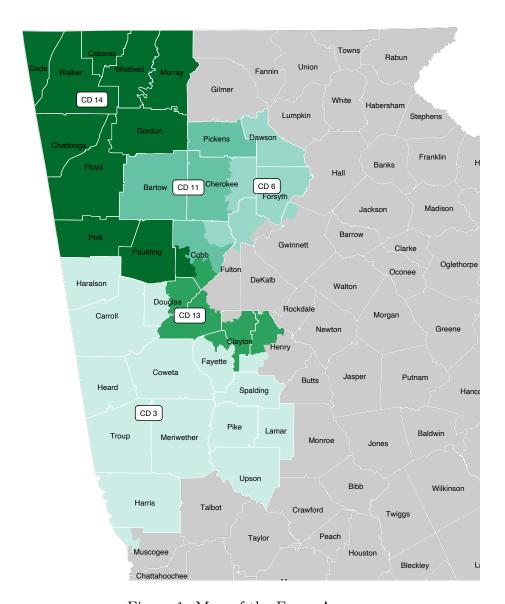
Figure 1: Map of the Focus Area

was provided to counsel by the Georgia Secretary of State in a prior case.[3] Data on turnout by race for the 2020 general election and the 2018 and 2021 runoff elections was retrieved from the website of the Georgia Secretary of State.[4] Data on turnout by race for the 2022 general election was provided to counsel by the Georgia Secretary of State, and 2022 precinct-level election results were downloaded from the the website of the Georgia Secretary of State.[5] Precinct-level election results for the 2018[6], 2020, and

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[3] *Dwight v. Raffensperger* (No. 1:18-cv-2869-RWS).

[4] https://sos.ga.gov/index.php/Elections.

[5] https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary.

[6] Voting and Election Science Team, 2019, "2018 Precinct-Level Election Results", https://doi.org/10.7910/DVN/UBKYRU, Harvard Dataverse, V47; ga_2018.zip.

2021[7] elections was assembled by the Voting and Election Science Team, an academic group that provides precinct-level data for U.S. Elections, based on data from the Secretary of State.[8,9] Precinct shape files for 2012 through 2020 were downloaded from the Georgia General Assembly's Legislative and Congressional Reapportionment Office.[10]

12. The state of Georgia provides six options for race and ethnicity on the voter registration form: Black, White, Hispanic/Latino, Asian/Pacific Islander, American Indian, and Other.[11] I combined Hispanic/Latino, Asian/Pacific Islander and American Indian into the "Other" category.

Racially Polarized Voting Analysis

13. In analyzing racially polarized voting in each election, I used a statistical procedure, ecological inference (EI), that estimates group-level preferences based on aggregate data. I analyzed the results for three racial demographic groups: Non-Hispanic Black, Non-Hispanic White, and Other, based on the voters' self-identified race in the voter registration database. I excluded third party and write-in candidates, and analyzed votes for the two major-party candidates in each election. The results of this analysis are estimates of the percentage of each group that voted for the candidate from each party in each election. The results include both a mean estimate (the most likely vote share) and a 95% confidence interval.[12]

14. Interpreting the results of the ecological inference models proceeds in two general stages. First, I examined the support for each candidate by each demographic group to determine if members of the group vote cohesively in support of a single candidate in each election. When a significant majority of the group supports a single candidate, I can then identify that candidate as the group's candidate of choice. If the group's support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate and does not have a clear preference. Second, after identifying the preferred candidate for each group (or the lack of such a candidate), I compared the preferences of White voters to the preferences of Black voters. Evidence of

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[7]Voting and Election Science Team, 2020, "2020 Precinct-Level Election Results", https://doi.org/10.7910/DVN/K7760H, Harvard Dataverse, V21; ga_2020.zip. Note that the 2020 election results file includes the 2021 runoff election results as well.

[8]The election results provided by VEST are the same as the precinct-level data available on the website of the Georgia Secretary of State. However, VEST provides the data in a more convenient format.

[9]As of December 12, 2022, precinct-level voter turnout data for the 2022 runoff election was not available.

[10]https://www.legis.ga.gov/joint-office/reapportionment.

[11]https://sos.ga.gov/admin/files/GA_VR_APP_2019.pdf.

[12]The 95% confidence interval is a measure of uncertainty in the estimates from the model. For example, the model might estimate that 94% of the members of a group voted for a particular candidate, with a 95% confidence interval of 91-96%. This means that based on the data and the model assumptions, 95% of the simulated estimates for this group fall in the range of 91-96%, with 94% being the average value. Larger confidence intervals reflect a higher degree of uncertainty in the estimates, while smaller confidence intervals reflect less uncertainty.

racially polarized voting is found when Black voters and White voters support different candidates.

15. Figure 2 presents the estimates of support for the Black-preferred candidate for Black and White voters for all 40 electoral contests from 2012 to 2022. Here, I present only the estimates and confidence intervals, and exclude individual election labels. Full results for each election are presented in Figure 3 and Table 1. In each panel, the solid dots correspond to an estimate in a particular election, and the gray vertical lines behind each dot are the 95% confidence intervals for the estimate.[13]
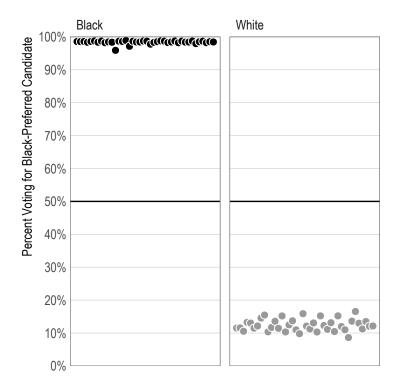

Figure 2: Racially Polarized Voting Estimates by Race — Focus Area

16. Examining Figure 2, the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. On average, Black voters supported their candidates of choice with 98.4% of the vote.

17. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every election. On average, White voters supported Black-preferred candidates with 12.4% of the vote, and in no election did this estimate exceed 17%.

18. Figure 3 presents the same results as Figure 2, separated by each electoral contest. The estimated levels of support for the Black-preferred candidate in each election for each

[13]In some cases the lines for the confidence intervals are not visible behind the dots because they are relatively small.

Figure 3: Racially Polarized Voting Estimates by Election — Focus Area

group are represented by the colored points, and the horizontal lines indicate the range of the 95% confidence intervals. In every election, Black voters have a clear candidate of choice, and White voters are strongly opposed to this candidate.

19. There is also strong evidence of racially polarized voting in each of the five congressional districts that comprise the focus area. Figure 4 plots the results, and Tables 2–6 present the full results. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections in each district. On average, Black voters supported their candidates of choice with 97.2% of the vote in CD 3, 93.3% in CD 6, 96.1% in CD 11, 99.0% in CD 13, and 95.8% in CD 14.

20. In contrast to Black voters, Figure 4 shows that White voters are highly cohesive in voting in opposition to the Black-preferred candidate in every election in each district. On average, White voters supported Black-preferred candidates with 6.7% of the vote in CD 3, 20.2% in CD 6, 16.1% in CD 11, 15.5% in CD 13, and 10.3% in CD 14.
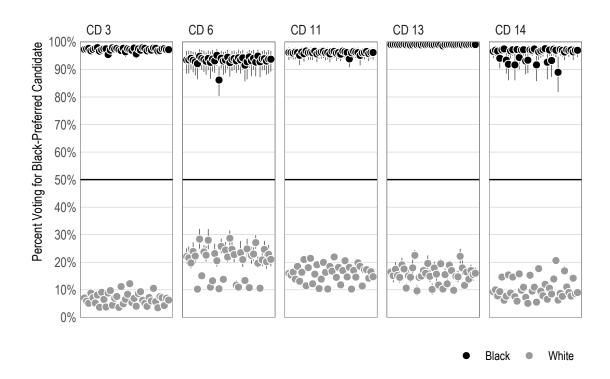

Figure 4: Racially Polarized Voting Estimates by Race — Congressional Districts

7

Performance of Black-Preferred Candidates in the Focus Area

21. Having identified the Black-preferred candidate in each election, I now turn to their ability to win elections in these districts. Table 7 presents the results of each election in the focus area and each congressional district. For each election, I present the vote share obtained by the Black-preferred candidate.[14]

22. The White-preferred candidate won the majority of the vote in all 40 elections in the focus area. In the 3rd, 6th, 11th, and 14th Congressional Districts, the White-preferred candidate received a larger share of the vote than the Black-preferred candidate in all 40 elections. In the 13th Congressional District, the Black-preferred candidate won a larger share of the vote in all 40 elections.

Performance of the the Sixth Congressional District in the Illustrative Map

23. I also analyzed the performance of Black-preferred candidates in the new 6th Congressional District proposed in the plaintiffs' illustrative map by calculating the percentage of the vote won by the Black-preferred candidates across the 31 statewide races from 2012 through 2021.

24. To perform this analysis, I used geographic data on the boundaries of the voting precincts in each year and the boundaries of the districts in the illustrative maps to determine which voting precincts would be located in each district. Then, I aggregated the election results for each contest for all of the precincts in each district to find the estimated vote shares of candidates in each contest. I was not able to include the 2022 elections in this analysis because, as of December 12, 2022, precinct boundary data for the 2022 voting precincts was not available.

25. Figure 5 presents the results of this analysis. In the plaintiffs' illustrative 6th Congressional District, the Black-preferred candidate won a larger share of the vote in all 31 statewide elections, with an average of 66.1%. Table 8 provide the full results.

26. Under the plaintiffs' illustrative map, the 13th Congressional District (the only district in the focus area to which the Black-preferred candidate won a majority of the vote in every election) continues to perform for Black-preferred candidates. I estimate that under this map Black-preferred candidates won a larger share of the vote in all 40 statewide elections, with an average of 62.3%.

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[14]Winning elections in Georgia requires a majority of the vote rather than a plurality of the vote (the threshold in most of the states). In this table and following sections analyzing election results I present vote shares as percentages of the two-party vote (excluding third party and independent candidates).
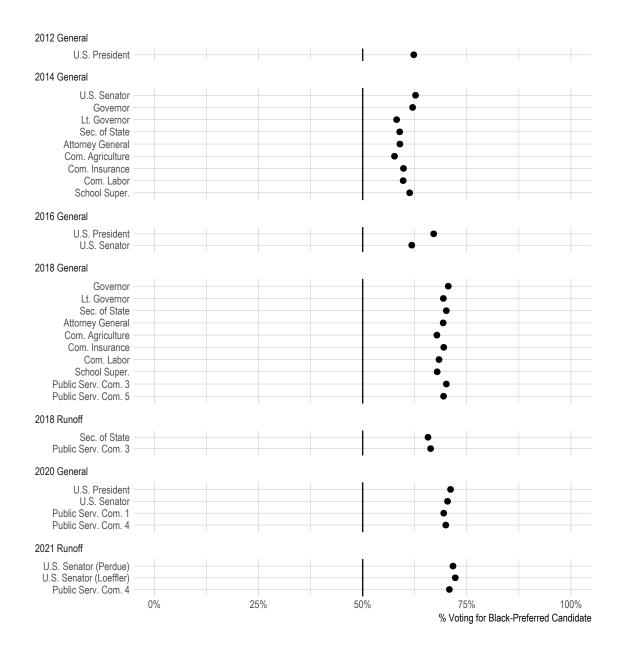
Figure 5: Vote Shares of Black-Preferred Candidates in CD 6 Under the Illustrative Map

Table 1: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — Focus Area

		Black	White	Other
2012 General	U.S. President*	97.1% (96.6, 97.6)	12.3% (12.0, 12.5)	94.7% (92.9, 96.2)
2014 General	U.S. Senator	98.8% (98.4, 99.1)	13.7% (13.4, 14.0)	94.0% (91.4, 96.0)
	Governor	98.7% (98.3, 99.0)	15.2% (14.8, 15.6)	83.8% (80.2, 87.3)
	Lt. Governor*	98.2% (97.8, 98.6)	11.0% (10.5, 11.5)	70.0% (65.7, 73.8)
	Sec. of State*	98.5% (98.1, 98.8)	11.2% (10.8, 11.6)	75.1% (71.7, 78.7)
	Attorney General	98.4% (98.0, 98.7)	11.4% (11.0, 11.9)	79.2% (75.3, 83.0)
	Com. Agriculture	97.8% (97.2, 98.3)	11.1% (10.6, 11.6)	66.9% (62.7, 71.4)
	Com. Insurance*	98.4% (98.0, 98.8)	11.2% (10.8, 11.7)	79.2% (75.1, 83.0)
	Com. Labor*	98.6% (98.2, 98.9)	11.5% (11.0, 11.9)	78.7% (75.3, 82.5)
	School Super.*	98.7% (98.3, 99.0)	13.0% (12.6, 13.5)	86.9% (83.3, 90.1)
2016 General	U.S. President	98.7% (98.4, 99.0)	12.1% (11.8, 12.4)	94.7% (93.3, 95.8)
	U.S. Senator	95.9% (95.0, 96.7)	8.6% (8.1, 9.2)	85.6% (82.0, 89.3)
2018 General	Governor*	98.9% (98.6, 99.1)	13.2% (13.0, 13.5)	93.5% (92.2, 94.6)
	Lt. Governor	98.5% (98.2, 98.8)	13.0% (12.7, 13.3)	91.2% (89.6, 92.5)
	Sec. of State	98.7% (98.4, 99.0)	13.5% (13.2, 13.8)	92.2% (90.7, 93.6)
	Attorney General	98.6% (98.2, 98.9)	13.6% (13.1, 14.1)	90.0% (87.6, 92.2)
	Com. Agriculture	98.2% (97.7, 98.7)	11.5% (11.1, 11.9)	87.6% (85.3, 89.8)
	Com. Insurance*	98.7% (98.3, 98.9)	12.1% (11.8, 12.5)	91.7% (90.1, 93.1)
	Com. Labor	98.4% (97.9, 98.7)	11.7% (11.3, 12.2)	89.2% (86.7, 91.2)
	School Super.*	98.4% (98.0, 98.7)	11.0% (10.6, 11.4)	88.1% (86.0, 90.0)
	Public Serv. Com. 3	98.7% (98.4, 99.0)	13.1% (12.8, 13.5)	92.2% (90.6, 93.5)
	Public Serv. Com. 5	98.7% (98.4, 99.0)	12.5% (12.2, 12.9)	90.5% (88.7, 92.0)
2018 Runoff	Sec. of State	98.6% (98.2, 98.9)	15.2% (14.9, 15.6)	90.0% (87.8, 91.8)
	Public Serv. Com. 3	98.6% (98.2, 98.9)	16.5% (16.2, 16.9)	90.2% (87.8, 92.2)
2020 General	U.S. President	98.0% (97.4, 98.4)	15.5% (15.0, 16.0)	90.4% (88.0, 92.3)
	U.S. Senator	98.2% (97.8, 98.7)	13.6% (13.2, 14.1)	90.8% (88.7, 92.7)
	Public Serv. Com. 1*	98.3% (97.9, 98.7)	11.6% (11.2, 12.0)	90.0% (88.1, 91.7)
	Public Serv. Com. 4*	98.4% (98.0, 98.7)	12.0% (11.6, 12.4)	91.6% (89.6, 93.1)
2021 Runoff	U.S. Senator (Perdue)	98.7% (98.4, 99.0)	14.5% (14.3, 14.9)	94.4% (93.1, 95.5)
	U.S. Senator (Loeffler)*	98.7% (98.4, 99.0)	15.2% (14.9, 15.5)	95.1% (93.9, 96.1)
	Public Serv. Com. 4*	98.7% (98.4, 99.0)	13.1% (12.8, 13.4)	93.4% (91.9, 94.5)
2022 General	U.S. Senator*	98.7% (98.4, 99.0)	15.9% (15.6, 16.2)	95.7% (94.5, 96.6)
	Governor*	98.5% (98.2, 98.9)	10.3% (9.9, 10.8)	88.1% (86.2, 89.9)
	Lt. Governor	98.4% (98.0, 98.8)	12.1% (11.8, 12.6)	91.4% (89.6, 93.0)
	Sec. of State	98.3% (97.8, 98.6)	10.5% (10.0, 11.1)	81.6% (79.2, 84.2)
	Attorney General	98.6% (98.2, 98.9)	12.1% (11.7, 12.5)	89.7% (87.8, 91.4)
	Com. Agriculture*	98.5% (98.2, 98.9)	9.8% (9.4, 10.2)	88.7% (87.1, 90.3)
	Com. Insurance*	98.4% (98.0, 98.8)	10.3% (9.9, 10.8)	87.4% (85.4, 89.2)
	Com. Labor*	98.5% (98.1, 98.8)	10.4% (10.0, 10.8)	90.9% (89.2, 92.3)
	School Super.*	98.4% (98.0, 98.8)	10.4% (10.0, 10.9)	87.4% (85.5, 89.1)

* Indicates that the Black candidate of choice was Black.

Table 2: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 3

		Black	White	Other
2012 General	U.S. President*	95.4% (93.7, 96.7)	8.8% (8.2, 9.7)	92.2% (85.7, 95.9)
2014 General	U.S. Senator	97.2% (95.7, 98.3)	11.2% (10.4, 12.2)	88.1% (77.5, 94.8)
	Governor	96.8% (95.3, 98.0)	12.2% (11.3, 13.4)	83.1% (70.1, 92.5)
	Lt. Governor*	96.8% (95.3, 97.9)	6.3% (5.5, 7.2)	84.8% (74.0, 92.2)
	Sec. of State*	97.1% (95.7, 98.2)	6.9% (6.2, 8.0)	86.3% (74.2, 93.2)
	Attorney General	96.6% (95.2, 97.8)	8.1% (7.5, 9.1)	87.9% (77.1, 93.7)
	Com. Agriculture	96.4% (94.5, 97.7)	6.6% (5.7, 7.7)	80.6% (67.1, 90.9)
	Com. Insurance*	97.0% (95.6, 98.1)	7.2% (6.5, 8.1)	86.7% (77.1, 93.6)
	Com. Labor*	97.0% (95.5, 98.1)	7.5% (6.7, 8.5)	85.9% (74.6, 93.8)
	School Super.*	97.3% (96.0, 98.3)	9.7% (8.9, 10.7)	84.6% (74.4, 92.2)
2016 General	U.S. President	97.7% (96.4, 98.6)	7.0% (6.6, 7.5)	94.5% (91.1, 96.9)
	U.S. Senator	95.6% (93.8, 97.1)	4.0% (3.5, 4.8)	92.0% (87.6, 95.1)
2018 General	Governor*	97.8% (96.7, 98.6)	6.5% (6.1, 7.0)	95.3% (92.2, 97.3)
	Lt. Governor	97.4% (96.3, 98.3)	6.2% (5.7, 6.8)	94.5% (90.8, 97.1)
	Sec. of State	97.5% (96.3, 98.4)	7.2% (6.7, 7.8)	94.8% (91.6, 97.1)
	Attorney General	97.6% (96.4, 98.5)	7.6% (7.1, 8.2)	93.6% (89.6, 96.3)
	Com. Agriculture	97.2% (96.0, 98.1)	4.9% (4.4, 5.5)	93.7% (90.3, 96.2)
	Com. Insurance*	97.5% (96.3, 98.4)	5.7% (5.2, 6.2)	94.9% (91.8, 97.0)
	Com. Labor	97.6% (96.5, 98.5)	5.1% (4.7, 5.7)	94.4% (90.8, 97.0)
	School Super.*	97.5% (96.3, 98.3)	4.4% (4.0, 4.9)	94.8% (91.9, 96.9)
	Public Serv. Com. 3	97.6% (96.5, 98.5)	6.9% (6.4, 7.5)	94.0% (90.8, 96.7)
	Public Serv. Com. 5	97.7% (96.5, 98.5)	5.9% (5.5, 6.5)	94.5% (91.1, 96.8)
2018 Runoff	Sec. of State	96.7% (95.0, 97.9)	8.8% (8.2, 9.4)	93.0% (89.0, 96.1)
	Public Serv. Com. 3	96.8% (95.2, 98.0)	10.5% (9.9, 11.4)	90.0% (82.2, 94.8)
2020 General	U.S. President	97.4% (96.2, 98.4)	8.4% (7.9, 9.0)	94.9% (91.4, 97.2)
	U.S. Senator	97.5% (96.1, 98.4)	6.9% (6.5, 7.4)	96.3% (94.0, 97.9)
	Public Serv. Com. 1*	97.9% (96.9, 98.7)	5.1% (4.7, 5.6)	95.6% (92.8, 97.4)
	Public Serv. Com. 4*	97.7% (96.5, 98.6)	5.9% (5.4, 6.4)	95.6% (93.1, 97.4)
2021 Runoff	U.S. Senator (Perdue)	97.8% (96.5, 98.6)	8.6% (8.2, 9.2)	95.4% (92.5, 97.4)
	U.S. Senator (Loeffler)*	97.5% (96.2, 98.5)	9.3% (8.8, 10.0)	95.2% (92.0, 97.2)
	Public Serv. Com. 4*	97.9% (96.8, 98.7)	7.1% (6.7, 7.6)	95.3% (92.5, 97.2)
2022 General	U.S. Senator*	97.6% (96.3, 98.6)	9.1% (8.6, 9.7)	94.8% (91.6, 97.0)
	Governor*	97.2% (95.8, 98.2)	4.0% (3.5, 4.6)	92.2% (88.9, 94.6)
	Lt. Governor	97.0% (95.5, 98.1)	5.4% (4.9, 6.0)	94.0% (91.2, 96.2)
	Sec. of State	96.9% (95.3, 98.0)	3.5% (3.0, 4.0)	91.8% (88.6, 94.2)
	Attorney General	97.3% (95.9, 98.3)	5.2% (4.7, 5.8)	94.0% (90.7, 96.3)
	Com. Agriculture*	97.0% (95.7, 98.0)	3.6% (3.0, 4.3)	90.8% (86.8, 94.1)
	Com. Insurance*	97.8% (96.7, 98.6)	3.7% (3.3, 4.3)	92.2% (88.8, 94.8)
	Com. Labor*	97.2% (95.8, 98.2)	4.3% (3.8, 4.9)	92.3% (89.0, 94.9)
	School Super.*	97.2% (96.0, 98.2)	3.6% (3.2, 4.1)	93.0% (90.2, 95.4)

* Indicates that the Black candidate of choice was Black.

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Table 3: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 6

		Black	White	Other
2012 General	U.S. President*	86.2% (80.4, 91.1)	13.4% (12.6, 14.4)	90.4% (83.0, 95.1)
2014 General	U.S. Senator	93.8% (89.7, 96.7)	15.1% (14.2, 16.5)	87.6% (77.7, 94.0)
	Governor	94.0% (90.1, 96.7)	13.8% (12.9, 15.0)	90.3% (82.5, 95.7)
	Lt. Governor*	93.4% (88.7, 96.5)	10.3% (9.2, 11.5)	82.8% (74.5, 89.8)
	Sec. of State*	94.0% (89.7, 96.9)	10.8% (9.7, 12.1)	83.1% (73.5, 91.0)
	Attorney General	94.5% (90.6, 97.0)	10.6% (9.7, 11.8)	86.2% (77.9, 92.2)
	Com. Agriculture	92.8% (87.2, 96.3)	10.4% (9.3, 11.8)	79.6% (70.1, 87.2)
	Com. Insurance*	95.1% (91.3, 97.4)	11.0% (10.0, 12.3)	84.2% (75.0, 90.9)
	Com. Labor*	94.9% (91.4, 97.2)	11.0% (9.8, 12.6)	84.0% (72.0, 92.3)
	School Super.*	94.0% (89.9, 97.1)	13.3% (12.3, 14.7)	86.1% (75.8, 93.0)
2016 General	U.S. President	94.0% (89.8, 97.0)	19.7% (17.9, 22.1)	80.9% (70.5, 88.2)
	U.S. Senator	93.8% (88.4, 97.0)	11.7% (10.3, 13.4)	75.7% (68.5, 81.2)
2018 General	Governor*	94.4% (90.3, 97.2)	24.7% (21.6, 27.7)	67.0% (56.1, 77.8)
	Lt. Governor	92.5% (87.4, 95.9)	23.9% (20.9, 27.2)	64.8% (53.2, 75.4)
	Sec. of State	93.4% (88.4, 96.7)	23.7% (21.4, 26.2)	67.6% (59.6, 75.9)
	Attorney General	93.9% (89.7, 96.9)	21.9% (20.0, 24.3)	71.6% (63.0, 78.3)
	Com. Agriculture	93.8% (89.2, 97.0)	20.6% (18.4, 23.0)	66.6% (58.0, 74.3)
	Com. Insurance*	93.5% (88.5, 96.6)	22.8% (20.0, 25.7)	65.2% (54.5, 74.9)
	Com. Labor	94.2% (89.7, 97.1)	20.9% (18.5, 23.6)	66.9% (57.3, 75.1)
	School Super.*	94.1% (90.3, 96.8)	19.8% (17.8, 22.2)	66.0% (57.5, 72.7)
	Public Serv. Com. 3	93.7% (89.2, 96.7)	23.0% (20.6, 25.4)	68.7% (60.4, 77.3)
	Public Serv. Com. 5	94.2% (89.9, 97.1)	23.2% (20.3, 26.7)	63.8% (51.3, 73.6)
2018 Runoff	Sec. of State	92.1% (86.4, 95.9)	27.1% (24.9, 29.8)	56.6% (43.9, 67.2)
	Public Serv. Com. 3	91.5% (85.7, 95.5)	28.7% (26.1, 31.6)	55.8% (42.3, 68.0)
2020 General	U.S. President	94.8% (90.5, 97.3)	28.0% (24.7, 32.1)	69.7% (57.1, 79.9)
	U.S. Senator	93.0% (88.0, 96.4)	24.4% (21.8, 27.3)	70.9% (62.0, 78.8)
	Public Serv. Com. 1*	92.5% (86.6, 96.5)	22.1% (19.4, 25.0)	69.1% (59.9, 77.2)
	Public Serv. Com. 4*	93.1% (87.5, 96.7)	22.9% (19.8, 26.3)	68.5% (58.0, 77.7)
2021 Runoff	U.S. Senator (Perdue)	93.6% (89.1, 96.8)	24.7% (21.9, 27.8)	73.9% (64.1, 82.6)
	U.S. Senator (Loeffler)*	93.0% (88.1, 96.3)	25.8% (23.3, 28.6)	74.4% (65.0, 82.3)
	Public Serv. Com. 4*	92.8% (87.8, 96.3)	22.6% (20.2, 25.9)	73.2% (62.9, 80.5)
2022 General	U.S. Senator*	92.8% (86.4, 96.5)	28.4% (24.9, 32.1)	73.3% (61.2, 84.4)
	Governor*	94.0% (89.8, 96.9)	22.3% (19.5, 25.2)	62.5% (53.0, 71.4)
	Lt. Governor	92.7% (87.5, 95.9)	24.8% (21.9, 28.5)	65.3% (53.3, 75.1)
	Sec. of State	93.7% (89.4, 96.7)	20.2% (17.6, 23.0)	62.3% (53.5, 70.8)
	Attorney General	93.3% (89.0, 96.3)	23.5% (20.6, 27.7)	67.2% (54.2, 76.3)
	Com. Agriculture*	93.5% (88.6, 96.8)	21.0% (18.3, 24.3)	64.4% (53.7, 72.7)
	Com. Insurance*	93.1% (88.8, 96.2)	21.0% (18.5, 23.9)	64.0% (54.7, 72.0)
	Com. Labor*	93.1% (88.7, 96.3)	22.5% (19.5, 25.5)	63.4% (53.4, 72.9)
	School Super.*	93.0% (88.1, 96.2)	21.6% (18.6, 25.7)	63.0% (49.8, 72.6)

* Indicates that the Black candidate of choice was Black.

Table 4: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 11

		Black	White	Other
2012 General	U.S. President*	93.8% (90.8, 95.9)	14.6% (13.9, 15.5)	91.1% (84.6, 95.5)
2014 General	U.S. Senator	95.5% (93.0, 97.3)	16.4% (15.7, 17.4)	89.1% (80.0, 94.7)
	Governor	96.1% (93.7, 97.8)	16.3% (15.6, 17.3)	89.7% (80.2, 95.7)
	Lt. Governor*	96.1% (93.8, 97.8)	10.5% (9.9, 11.3)	90.2% (83.7, 94.9)
	Sec. of State*	96.0% (93.6, 97.8)	11.4% (10.8, 12.1)	91.3% (84.7, 95.9)
	Attorney General	96.5% (94.4, 98.1)	11.4% (10.9, 12.3)	91.5% (83.3, 95.8)
	Com. Agriculture	96.3% (93.8, 98.0)	10.3% (9.6, 11.0)	91.8% (85.6, 95.9)
	Com. Insurance*	96.7% (94.6, 98.1)	11.8% (11.2, 12.6)	90.7% (83.3, 95.7)
	Com. Labor*	96.2% (93.7, 97.8)	12.2% (11.6, 13.0)	90.2% (82.6, 95.3)
	School Super.*	96.1% (93.9, 97.8)	14.7% (14.0, 15.7)	90.3% (80.0, 95.6)
2016 General	U.S. President	96.2% (93.5, 98.0)	16.8% (16.1, 17.7)	93.3% (88.6, 96.5)
	U.S. Senator	96.7% (94.5, 98.3)	10.3% (9.7, 11.0)	94.7% (90.8, 97.3)
2018 General	Governor*	96.0% (93.3, 97.9)	19.1% (18.3, 20.2)	93.2% (86.9, 96.7)
	Lt. Governor	96.0% (93.5, 97.9)	18.1% (17.4, 19.1)	93.7% (88.5, 97.0)
	Sec. of State	96.5% (94.3, 98.2)	18.5% (17.8, 19.4)	93.8% (89.0, 97.0)
	Attorney General	96.6% (94.6, 98.1)	18.1% (17.4, 18.9)	94.1% (89.5, 97.0)
	Com. Agriculture	96.2% (93.7, 97.9)	15.7% (14.9, 16.7)	93.4% (88.2, 96.7)
	Com. Insurance*	96.5% (94.4, 98.2)	17.3% (16.5, 18.3)	92.2% (86.9, 96.1)
	Com. Labor	96.1% (93.7, 97.9)	16.4% (15.5, 17.6)	92.5% (86.1, 96.3)
	School Super.*	96.3% (94.0, 98.1)	15.4% (14.6, 16.4)	92.7% (86.7, 96.3)
	Public Serv. Com. 3	96.5% (94.0, 98.1)	18.5% (17.8, 19.7)	92.2% (85.7, 95.9)
	Public Serv. Com. 5	96.1% (93.9, 97.9)	17.3% (16.6, 18.3)	93.3% (88.3, 96.5)
2018 Runoff	Sec. of State	95.1% (91.5, 97.4)	19.8% (18.9, 20.9)	89.7% (81.4, 95.1)
	Public Serv. Com. 3	95.1% (91.6, 97.5)	21.4% (20.5, 22.7)	87.9% (78.5, 94.0)
2020 General	U.S. President	96.1% (93.7, 97.9)	20.6% (19.7, 21.9)	93.2% (87.7, 96.5)
	U.S. Senator	96.4% (94.0, 98.1)	18.5% (17.7, 19.6)	93.4% (88.8, 96.4)
	Public Serv. Com. 1*	96.2% (93.7, 97.9)	15.9% (15.2, 16.9)	94.6% (91.0, 97.0)
	Public Serv. Com. 4*	95.7% (93.0, 97.6)	17.0% (16.2, 18.0)	93.6% (89.8, 96.5)
2021 Runoff	U.S. Senator (Perdue)	96.1% (93.6, 97.8)	19.9% (19.2, 20.9)	94.5% (90.1, 97.3)
	U.S. Senator (Loeffler)*	96.2% (93.4, 98.0)	21.0% (20.2, 22.1)	94.2% (90.3, 97.0)
	Public Serv. Com. 4*	96.2% (94.1, 97.9)	18.1% (17.5, 19.0)	94.9% (91.5, 97.2)
2022 General	U.S. Senator*	95.6% (92.6, 97.5)	21.9% (21.0, 23.3)	92.4% (86.3, 96.3)
	Governor*	95.9% (93.1, 97.9)	14.5% (13.6, 15.7)	91.6% (86.7, 95.1)
	Lt. Governor	95.6% (92.6, 97.6)	17.0% (16.1, 18.2)	92.5% (87.3, 96.0)
	Sec. of State	96.1% (94.0, 97.7)	13.1% (12.4, 14.0)	93.5% (89.8, 96.3)
	Attorney General	96.0% (93.4, 97.7)	16.6% (15.8, 17.6)	93.0% (88.2, 96.1)
	Com. Agriculture*	96.1% (93.5, 97.9)	13.9% (13.0, 15.1)	91.9% (86.7, 95.3)
	Com. Insurance*	96.6% (94.2, 98.2)	13.9% (13.0, 15.1)	92.5% (87.0, 96.0)
	Com. Labor*	95.9% (93.6, 97.8)	14.7% (13.9, 15.8)	93.3% (89.0, 96.3)
	School Super.*	95.7% (92.8, 97.6)	14.2% (13.4, 15.3)	93.3% (89.3, 96.1)

* Indicates that the Black candidate of choice was Black.

Table 5: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 13

		Black	White	Other
2012 General	U.S. President*	99.2% (98.8, 99.4)	11.8% (10.8, 12.9)	96.7% (95.0, 98.0)
2014 General	U.S. Senator	99.2% (98.8, 99.4)	14.5% (13.3, 15.9)	94.8% (91.3, 96.8)
	Governor	99.1% (98.7, 99.4)	15.0% (13.3, 16.7)	84.7% (79.9, 89.2)
	Lt. Governor*	98.9% (98.5, 99.3)	9.6% (7.9, 11.6)	68.4% (62.5, 74.0)
	Sec. of State*	98.9% (98.5, 99.3)	9.8% (8.3, 11.5)	76.5% (71.4, 81.6)
	Attorney General	98.9% (98.5, 99.3)	12.2% (10.4, 14.0)	76.8% (71.5, 82.2)
	Com. Agriculture	98.9% (98.4, 99.3)	10.2% (8.3, 12.3)	61.0% (55.0, 66.8)
	Com. Insurance*	98.9% (98.5, 99.2)	10.6% (9.0, 12.3)	79.2% (74.1, 84.4)
	Com. Labor*	99.0% (98.6, 99.3)	10.3% (8.7, 11.9)	81.3% (76.7, 85.9)
	School Super.*	99.1% (98.7, 99.4)	11.6% (10.2, 13.2)	90.3% (85.9, 94.0)
2016 General	U.S. President	99.1% (98.7, 99.4)	15.2% (13.5, 17.1)	93.2% (89.6, 96.3)
	U.S. Senator	98.6% (98.0, 99.0)	15.1% (12.7, 17.7)	64.2% (58.6, 70.2)
2018 General	Governor*	99.1% (98.8, 99.4)	16.5% (15.2, 17.9)	96.2% (94.3, 97.6)
	Lt. Governor	99.1% (98.8, 99.5)	16.0% (14.2, 18.0)	91.2% (87.8, 94.2)
	Sec. of State	99.1% (98.7, 99.4)	16.5% (14.9, 18.3)	94.1% (91.1, 96.3)
	Attorney General	99.0% (98.5, 99.3)	17.0% (15.0, 19.1)	88.8% (85.0, 92.5)
	Com. Agriculture	99.0% (98.7, 99.3)	14.7% (12.7, 17.0)	83.8% (80.2, 87.2)
	Com. Insurance*	99.1% (98.7, 99.4)	14.9% (13.1, 16.9)	93.8% (91.0, 96.3)
	Com. Labor	99.1% (98.7, 99.4)	14.6% (12.7, 16.7)	87.2% (83.6, 90.4)
	School Super.*	99.1% (98.7, 99.4)	13.9% (12.1, 15.9)	86.0% (82.6, 89.2)
	Public Serv. Com. 3	99.1% (98.7, 99.4)	17.0% (15.4, 18.8)	93.3% (90.6, 96.0)
	Public Serv. Com. 5	99.1% (98.7, 99.4)	16.0% (14.2, 18.0)	91.4% (88.3, 94.2)
2018 Runoff	Sec. of State	99.0% (98.6, 99.3)	17.0% (15.6, 18.5)	95.1% (92.5, 97.1)
	Public Serv. Com. 3	99.0% (98.5, 99.3)	19.0% (17.5, 20.7)	94.7% (91.8, 96.9)
2020 General	U.S. President	98.9% (98.5, 99.3)	22.2% (19.6, 24.9)	80.6% (77.1, 84.1)
	U.S. Senator	98.9% (98.5, 99.3)	19.1% (16.7, 21.6)	85.3% (82.0, 88.4)
	Public Serv. Com. 1*	99.0% (98.6, 99.3)	17.5% (15.0, 20.1)	84.6% (81.1, 87.9)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	17.9% (15.6, 20.2)	86.7% (83.8, 89.6)
2021 Runoff	U.S. Senator (Perdue)	99.0% (98.7, 99.3)	17.5% (16.2, 19.2)	95.8% (94.1, 97.2)
	U.S. Senator (Loeffler)*	99.1% (98.7, 99.4)	19.4% (17.9, 21.2)	95.0% (92.9, 96.8)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	15.5% (14.0, 17.7)	95.2% (92.3, 97.0)
2022 General	U.S. Senator*	99.0% (98.6, 99.3)	22.5% (20.8, 24.4)	95.1% (92.8, 97.0)
	Governor*	99.0% (98.6, 99.3)	14.9% (12.8, 17.3)	86.9% (84.0, 89.7)
	Lt. Governor	98.8% (98.4, 99.2)	17.9% (15.6, 20.7)	90.0% (86.5, 93.2)
	Sec. of State	98.9% (98.5, 99.3)	19.6% (16.8, 22.5)	71.5% (68.0, 75.1)
	Attorney General	98.9% (98.5, 99.2)	18.0% (15.6, 20.9)	87.4% (83.8, 90.6)
	Com. Agriculture*	99.0% (98.5, 99.3)	14.5% (12.6, 16.8)	88.4% (85.7, 91.1)
	Com. Insurance*	99.0% (98.6, 99.3)	15.6% (13.2, 18.2)	84.8% (81.5, 87.9)
	Com. Labor*	98.9% (98.5, 99.2)	15.0% (13.1, 17.4)	91.0% (88.0, 93.7)
	School Super.*	98.9% (98.5, 99.3)	15.7% (13.3, 18.4)	85.3% (81.9, 88.5)

* Indicates that the Black candidate of choice was Black.

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Table 6: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 14

		Black	White	Other
2012 General	U.S. President*	93.4% (88.5, 96.9)	15.8% (14.8, 17.1)	83.3% (69.3, 93.1)
2014 General	U.S. Senator	94.3% (90.0, 97.3)	16.9% (15.7, 18.7)	76.7% (52.3, 90.7)
	Governor	91.9% (86.1, 96.1)	20.6% (19.3, 22.3)	73.2% (48.1, 88.2)
	Lt. Governor*	89.0% (81.8, 94.7)	14.2% (13.1, 15.6)	77.9% (59.0, 92.4)
	Sec. of State*	93.4% (88.6, 96.8)	14.6% (13.4, 16.1)	71.7% (51.4, 87.4)
	Attorney General	91.7% (86.1, 96.0)	15.4% (14.1, 17.0)	70.8% (49.4, 88.3)
	Com. Agriculture	91.7% (85.7, 96.0)	13.9% (12.7, 15.4)	71.3% (48.9, 87.7)
	Com. Insurance*	93.1% (88.3, 96.7)	14.6% (13.6, 15.8)	76.6% (61.9, 89.4)
	Com. Labor*	92.6% (86.4, 96.3)	15.3% (14.1, 16.7)	74.2% (54.5, 89.5)
	School Super.*	93.2% (87.3, 96.9)	17.7% (16.5, 19.2)	72.2% (52.0, 88.3)
2016 General	U.S. President	96.4% (93.5, 98.3)	8.6% (8.0, 9.4)	92.8% (87.4, 96.2)
	U.S. Senator	94.0% (90.4, 97.0)	7.6% (6.9, 8.5)	89.3% (82.4, 94.0)
2018 General	Governor*	97.4% (95.1, 98.8)	9.0% (8.5, 9.7)	94.1% (89.9, 97.0)
	Lt. Governor	96.6% (94.2, 98.3)	9.3% (8.7, 10.0)	93.8% (89.4, 96.8)
	Sec. of State	96.7% (93.8, 98.6)	10.0% (9.4, 10.9)	94.1% (88.5, 97.1)
	Attorney General	96.7% (94.2, 98.5)	9.9% (9.3, 10.5)	93.8% (90.0, 96.5)
	Com. Agriculture	97.2% (95.0, 98.6)	7.7% (7.2, 8.4)	95.1% (91.7, 97.3)
	Com. Insurance*	96.9% (94.4, 98.6)	8.8% (8.3, 9.6)	95.0% (91.0, 97.5)
	Com. Labor	96.6% (94.1, 98.3)	8.5% (7.9, 9.2)	94.9% (90.9, 97.4)
	School Super.*	97.1% (94.7, 98.7)	7.8% (7.3, 8.5)	94.1% (89.7, 96.9)
	Public Serv. Com. 3	97.0% (94.4, 98.6)	9.5% (8.9, 10.3)	93.6% (88.7, 96.8)
	Public Serv. Com. 5	97.1% (94.9, 98.7)	9.0% (8.5, 9.8)	93.9% (89.4, 96.9)
2018 Runoff	Sec. of State	96.4% (93.4, 98.3)	10.9% (10.1, 11.9)	88.0% (79.4, 94.4)
	Public Serv. Com. 3	96.3% (93.4, 98.3)	12.0% (11.2, 13.2)	88.5% (76.3, 95.4)
2020 General	U.S. President	96.9% (94.6, 98.4)	9.3% (8.8, 10.0)	94.3% (91.0, 96.6)
	U.S. Senator	97.0% (95.0, 98.5)	8.7% (8.2, 9.3)	95.1% (92.2, 97.1)
	Public Serv. Com. 1*	97.0% (94.9, 98.5)	7.3% (6.7, 7.9)	94.2% (90.9, 96.5)
	Public Serv. Com. 4*	97.4% (95.7, 98.7)	7.8% (7.3, 8.4)	94.9% (92.0, 97.0)
2021 Runoff	U.S. Senator (Perdue)	96.9% (94.7, 98.5)	10.6% (10.0, 11.3)	95.0% (91.5, 97.3)
	U.S. Senator (Loeffler)*	97.0% (95.0, 98.4)	10.9% (10.4, 11.7)	94.1% (90.2, 96.7)
	Public Serv. Com. 4*	97.0% (95.1, 98.5)	9.5% (9.0, 10.1)	94.8% (91.5, 97.2)
2022 General	U.S. Senator*	97.2% (95.0, 98.6)	11.0% (10.5, 11.7)	94.7% (91.1, 97.3)
	Governor*	97.5% (95.8, 98.7)	5.5% (5.1, 6.1)	95.0% (92.1, 97.2)
	Lt. Governor	97.1% (95.0, 98.5)	7.7% (7.2, 8.3)	94.5% (91.0, 96.9)
	Sec. of State	97.1% (95.2, 98.5)	5.1% (4.6, 5.6)	95.1% (92.2, 97.2)
	Attorney General	97.1% (95.0, 98.6)	7.5% (7.0, 8.1)	95.3% (91.8, 97.6)
	Com. Agriculture*	97.0% (95.0, 98.4)	5.9% (5.4, 6.5)	94.7% (91.2, 97.1)
	Com. Insurance*	97.4% (95.6, 98.7)	6.3% (5.8, 6.8)	94.8% (91.7, 97.0)
	Com. Labor*	97.2% (95.2, 98.5)	6.6% (6.1, 7.1)	94.8% (91.7, 97.0)
	School Super.*	97.2% (95.1, 98.6)	6.2% (5.7, 6.8)	95.3% (92.5, 97.3)

* Indicates that the Black candidate of choice was Black.

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Table 7: Election Results in the Focus Area — Vote Share of Black-Preferred Candidates

		Focus Area	CD 3	CD 6	CD 11	CD 13	CD 14
2012 General	U.S. President	39.5%	32.2%	28.0%	32.7%	74.8%	29.8%
2014 General	U.S. Senator	40.2%	32.2%	28.6%	32.6%	75.8%	30.7%
	Governor	40.4%	32.6%	27.9%	32.7%	75.0%	33.1%
	Lt. Governor	36.1%	28.1%	24.1%	28.1%	71.8%	27.8%
	Sec. of State	36.8%	28.8%	24.6%	28.9%	72.6%	28.4%
	Attorney General	37.3%	29.7%	24.8%	29.0%	73.3%	28.7%
	Com. Agriculture	35.9%	28.0%	23.8%	28.1%	71.3%	27.5%
	Com. Insurance	37.3%	29.1%	25.0%	29.3%	73.3%	28.7%
	Com. Labor	37.4%	29.2%	24.9%	29.5%	73.3%	29.0%
	School Super.	39.1%	30.9%	27.0%	31.5%	74.6%	30.9%
2016 General	U.S. President	41.8%	31.6%	35.8%	36.7%	77.7%	27.8%
	U.S. Senator	37.7%	28.7%	28.9%	32.2%	73.7%	26.4%
2018 General	Governor	44.7%	32.8%	38.6%	40.0%	80.9%	30.1%
	Lt. Governor	43.9%	32.3%	37.4%	39.3%	79.9%	30.1%
	Sec. of State	44.6%	33.1%	37.9%	39.7%	80.5%	30.7%
	Attorney General	44.3%	33.3%	37.5%	39.5%	79.8%	30.6%
	Com. Agriculture	42.6%	31.3%	35.5%	37.6%	78.7%	29.2%
	Com. Insurance	43.7%	32.1%	36.7%	38.6%	80.2%	30.0%
	Com. Labor	43.0%	31.6%	35.8%	38.0%	79.2%	29.7%
	School Super.	42.4%	31.1%	34.8%	37.3%	78.9%	29.1%
	Public Serv. Com. 3	44.5%	32.9%	37.6%	39.6%	80.6%	30.3%
	Public Serv. Com. 5	43.9%	32.3%	36.8%	38.8%	80.2%	30.1%
2018 Runoff	Sec. of State	41.6%	30.4%	36.5%	35.8%	76.9%	28.3%
	Public Serv. Com. 3	42.6%	31.4%	37.5%	37.0%	77.4%	29.1%
2020 General	U.S. President	45.7%	34.7%	42.3%	42.3%	80.3%	31.2%
	U.S. Senator	44.7%	33.8%	39.9%	40.9%	80.4%	30.8%
	Public Serv. Com. 1	43.4%	32.6%	37.8%	39.2%	80.1%	29.6%
	Public Serv. Com. 4	44.0%	33.1%	38.3%	39.8%	80.5%	30.2%
2021 Runoff	U.S. Senator (Perdue)	46.1%	35.2%	40.5%	41.7%	82.2%	32.3%
	U.S. Senator (Loeffler)	46.6%	35.6%	41.3%	42.4%	82.5%	32.4%
	Public Serv. Com. 4	45.1%	34.1%	38.8%	40.5%	81.7%	31.5%
2022 General	U.S. Senator	46.6%	35.3%	42.7%	42.4%	83.4%	31.9%
	Governor	41.8%	31.3%	36.0%	37.0%	80.6%	27.8%
	Lt. Governor	43.4%	32.4%	38.4%	38.8%	81.5%	29.2%
	Sec. of State	41.0%	30.8%	34.5%	36.3%	79.1%	27.5%
	Attorney General	43.1%	32.4%	37.9%	38.6%	81.2%	29.2%
	Com. Agriculture	41.6%	30.8%	35.5%	36.5%	80.8%	27.9%
	Com. Insurance	41.6%	31.2%	35.4%	36.7%	80.3%	28.3%
	Com. Labor	42.2%	31.5%	36.3%	37.3%	81.2%	28.4%
	School Super.	41.7%	31.1%	35.6%	37.0%	80.4%	28.3%

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Table 8: Vote Share of Black-Preferred Candidates — Illustrative Map

		CD 6
2012 General	U.S. President	62.3%
2014 General	U.S. Senator	62.7%
	Governor	62.0%
	Lt. Governor	58.2%
	Sec. of State	58.9%
	Attorney General	58.9%
	Com. Agriculture	57.6%
	Com. Insurance	59.8%
	Com. Labor	59.7%
	School Super.	61.3%
2016 General	U.S. President	67.0%
	U.S. Senator	61.8%
2018 General	Governor	70.6%
	Lt. Governor	69.4%
	Sec. of State	70.1%
	Attorney General	69.3%
	Com. Agriculture	67.8%
	Com. Insurance	69.5%
	Com. Labor	68.3%
	School Super.	67.9%
	Public Serv. Com. 3	70.1%
	Public Serv. Com. 5	69.4%
2018 Runoff	Sec. of State	65.7%
	Public Serv. Com. 3	66.3%
2020 General	U.S. President	71.1%
	U.S. Senator	70.4%
	Public Serv. Com. 1	69.5%
	Public Serv. Com. 4	70.0%
2021 Runoff	U.S. Senator (Perdue)	71.7%
	U.S. Senator (Loeffler)	72.2%
	Public Serv. Com. 4	70.8%

Table 9: List of Candidates in Statewide Elections, 2012–2022

		Democratic Candidate	Dem. Cand. Race	Republican Candidate	Rep. Cand. Race
2012 General	U.S. President	Barack Obama	Black	Mitt Romney	White
2014 General	U.S. Senator	Michelle Nunn	White	David Perdue	White
	Governor	Jason Carter	White	John Nathan Deal	White
	Lt. Governor	Connie Stokes	Black	L. S. 'Casey' Cagle	White
	Sec. of State	Doreen Carter	Black	Brian Kemp	White
	Attorney General	Gregory Hecht	White	Samuel Olens	White
	Com. Agriculture	Christopher Irvin	White	Gary Black	White
	Com. Insurance	Elizabeth Johnson	Black	Ralph Hudgens	White
	Com. Labor	Robbin Shipp	Black	J. Mark Butler	White
	School Super.	Valarie Wilson	Black	Richard Woods	White
2016 General	U.S. President	Hillary Clinton	White	Donald Trump	White
	U.S. Senator	Jim Barksdale	White	Johnny Isakson	White
2018 General	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Sarah Riggs Amico	White	Geoff Duncan	White
	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Attorney General	Charlie Bailey	White	Chris Carr	White
	Com. Agriculture	Fred Swann	White	Gary Black	White
	Com. Insurance	Janice Laws	Black	Jim Beck	White
	Com. Labor	Richard Keatley	White	Mark Butler	White
	School Super.	Otha Thornton	Black	Richard Woods	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
	Public Serv. Com. 5	Dawn Randolph	White	Tricia Pridemore	White
2018 Runoff	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
2020 General	U.S. President	Joe Biden	White	Donald Trump	White
	U.S. Senator	Jon Ossoff	White	David Perdue	White
	Public Serv. Com. 1	Robert Bryant	Black	Jason Shaw	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2021 Runoff	U.S. Senator (Perdue)	Jon Ossoff	White	David Perdue	White
	U.S. Senator (Loeffler)	Raphael Warnock	Black	Kelly Loeffler	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2022 General	U.S. Senator	Raphael Warnock	Black	Herschel Junior Walker	Black
	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Charlie Bailey	White	Burt Jones	White
	Sec. of State	Bee Nguyen	Asian	Brad Raffensperger	White
	Attorney General	Jennifer "Jen" Jordan	White	Chris Carr	White
	Com. Agriculture	Nakita Hemingway	Black	Tyler Harper	White
	Com. Insurance	Janice Laws Robinson	Black	John King	White
	Com. Labor	William "Will" Boddie, Jr	Black	Bruce Thompson	White
	School Super.	Alisha Thomas Searcy	Black	Richard Woods	White

* Excludes candidates in the 2020 Special Election for U.S. Senate

Maxwell Palmer

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Boston University   *Website:* `www.maxwellpalmer.com`
232 Bay State Road   *Phone:* (617) 358-2654
Boston, MA 02215

APPOINTMENTS   Boston University, Boston, Massachusetts

Associate Professor, Department of Political Science, 2021–Present

Director of Advanced Programs, Dept. of Political Science, 2020–Present

Civic Tech Fellow, Faculty of Computing & Data Sciences, 2021–Present

Faculty Fellow, Initiative on Cities, 2019–Present

Assistant Professor, Department of Political Science, 2014–2021

Junior Faculty Fellow, Hariri Institute for Computing, 2017–2020

EDUCATION   Harvard University, Cambridge, Massachusetts

Ph.D., Political Science, May 2014.

A.M., Political Science, May 2012.

Bowdoin College, Brunswick, Maine

A.B., Mathematics & Government and Legal Studies, May 2008.

BOOK   *Neighborhood Defenders: Participatory Politics and America's Housing Crisis* (with Katherine Levine Einstein and David M. Glick). 2019. New York, NY: Cambridge University Press.

– Selected chapters republished in *Political Science Quarterly*.

– Reviewed in *Perspectives on Politics*, *Political Science Quarterly*, *Economics 21*, *Public Books*, and *City Journal*.

– Covered in Vox's "The Weeds" podcast, CityLab, Slate's "Gabfest," Curbed, Brookings Institution Up Front.

REFEREED ARTICLES   Einstein, Katherine Levine, Joseph Ornstein, and Maxwell Palmer. 2022. "Who Represents the Renters?" *Housing Policy Debate*.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2022. "Developing a pro-housing movement? Public distrust of developers, fractured coalitions, and the challenges of measuring political power." *Interest Groups & Advocacy* 11:189--208.

1

Einstein, Katherine Levine, David Glick, Luisa Godinez Puig, and Maxwell Palmer. 2022. "Still Muted: The Limited Participatory Democracy of Zoom Public Meetings." *Urban Affairs Review*.

Glick, David M. and Maxwell Palmer. 2022. "County Over Party: How Governors Prioritized Geography Not Particularism in the Distribution of Opportunity Zones." *British Journal of Political Science* 52(4): 1902–1910.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2021. "Driving Turnout: The Effect of Car Ownership on Electoral Participation." *Political Science Research and Methods*.

Einstein, Katherine Levine and Maxwell Palmer. 2021. "Land of the Freeholder: How Property Rights Make Voting Rights." *Journal of Historical Political Economy* 1(4): 499–530.

Godinez Puig, Luisa, Katharine Lusk, David Glick, Katherine L. Einstein, Maxwell Palmer, Stacy Fox, and Monica L. Wang. 2020. "Perceptions of Public Health Priorities and Accountability Among US Mayors." *Public Health Reports* (October 2020).

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2020. "Can Mayors Lead on Climate Change? Evidence from Six Years of Surveys." *The Forum* 18(1).

Ban, Pamela, Maxwell Palmer, and Benjamin Schneer. 2019. "From the Halls of Congress to K Street: Government Experience and its Value for Lobbying." *Legislative Studies Quarterly* 44(4): 713–752.

Palmer, Maxwell and Benjamin Schneer. 2019. "Postpolitical Careers: How Politicians Capitalize on Public Office." *Journal of Politics* 81(2): 670–675.

Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. 2019. "Who Participates in Local Government? Evidence from Meeting Minutes." *Perspectives on Politics* 17(1): 28–46.
– Winner of the Heinz Eulau Award, American Political Science Association, 2020.

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2019. "City Learning: Evidence of Policy Information Diffusion From a Survey of U.S. Mayors." *Political Research Quarterly* 72(1): 243–258.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. "Do Mayors Run for Higher Office? New Evidence on Progressive Ambition." *American Politics Research* 48(1) 197–221.

2

Ansolabehere, Stephen, Maxwell Palmer and Benjamin Schneer. 2018. "Divided Government and Significant Legislation, A History of Congress from 1789-2010." *Social Science History* 42(1): 81–108.

Edwards, Barry, Michael Crespin, Ryan D. Williamson, and Maxwell Palmer. 2017. "Institutional Control of Redistricting and the Geography of Representation." *Journal of Politics* 79(2): 722–726.

Palmer, Maxwell. 2016. "Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?" *Journal of Empirical Legal Studies* 13(1): 153–177.

Palmer, Maxwell and Benjamin Schneer. 2016. "Capitol Gains: The Returns to Elected Office from Corporate Board Directorships." *Journal of Politics* 78(1): 181–196.

Gerring, John, Maxwell Palmer, Jan Teorell, and Dominic Zarecki. 2015. "Demography and Democracy: A Global, District-level Analysis of Electoral Contestation." *American Political Science Review* 109(3): 574–591.

OTHER
PUBLICATIONS

Einstein, Katherine Levine, David M. Glick and Maxwell Palmer. 2020. "Neighborhood Defenders: Participatory Politics and America's Housing Crisis." *Political Science Quarterly* 135(2): 281–312.

Ansolabehere, Stephen and Maxwell Palmer. 2016. "A Two Hundred-Year Statistical History of the Gerrymander." *Ohio State Law Journal* 77(4): 741–762.

Ansolabehere, Stephen, Maxwell Palmer, and Benjamin Schneer. 2016. "What Has Congress Done?" in *Governing in a Polarized Age: Elections, Parties, and Political Representation in America*, eds. Alan Gerber and Eric Schickler. New York, NY: Cambridge University Press.

POLICY
REPORTS

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. Looking back on ARPA and America's Cities: A Menino Survey Reflection. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2022. Representation in the Housing Process: Best Practices for Improving Racial Equity. Research Report. The Boston Foundation.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. 2021 Menino Survey of Mayors: Closing the Racial Wealth Gap. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2021. 2021

3

Menino Survey of Mayors: Building Back Better. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, Stacy Fox, Katharine Lusk, Nicholas Henninger, and Songhyun Park. 2021. 2020 Menino Survey of Mayors: Policing and Protests. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2020. 2020 Menino Survey of Mayors: COVID-19 Recovery and the Future of Cities. Research Report. Boston University Initiative on Cities.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2020. Got Wheels? How Having Access to a Car Impacts Voting. *Democracy Docket*.

Palmer, Maxwell, Katherine Levine Einstein, and David Glick. 2020. Counting the City: Mayoral Views on the 2020 Census. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, Stacy Fox, Marina Berardino, Noah Fischer, Jackson Moore-Otto, Aislinn O'Brien, Marilyn Rutecki and Benjamin Wuesthoff. 2020. COVID-19 Housing Policy. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, David Glick, and Stacy Fox. 2020. Mayoral Views on Cities' Legislators: How Representative are City Councils? Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2020. "Newton and other communities must reform housing approval process." *The Boston Globe*.

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2020. "2019 Menino Survey of Mayors." Research Report. Boston University Initiative on Cities.

Palmer, Maxwell, Katherine Levine Einstein, David Glick, and Stacy Fox. 2019. Mayoral Views on Housing Production: Do Planning Goals Match Reality? Research Report. Boston University Initiative on Cities.

Wilson, Graham, David Glick, Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2019. Mayoral Views on Economic Incentives: Valuable Tools or a Bad Use of Resources?. Research Report. Boston University Initiative on Cities

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2019. "2018 Menino Survey of Mayors." Research Report. Boston University Initiative

4

on Cities.

Einstein, Katherine Levine, Katharine Lusk, David Glick, Maxwell Palmer, Christiana McFarland, Leon Andrews, Aliza Wasserman, and Chelsea Jones. 2018. "Mayoral Views on Racism and Discrimination." National League of Cities and Boston University Initiative on Cities.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. "As the Trump administration retreats on climate change, US cities are moving forward." The Conversation.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. "Few big-city mayors see running for higher office as appealing." LSE United States Politics and Policy Blog.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. "2017 Menino Survey of Mayors." Research Report. Boston University Initiative on Cities.

Williamson, Ryan D., Michael Crespin, Maxwell Palmer, and Barry C. Edwards. 2017. "This is how to get rid of gerrymandered districts." The Washington Post, Monkey Cage Blog.

Palmer, Maxwell and Benjamin Schneer. 2015. "How and why retired politicians get lucrative appointments on corporate boards. " The Washington Post, Monkey Cage Blog.

CURRENT PROJECTS	"A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure" (with Benjamin Schneer and Kevin DeLuca). – Covered in *Fast Company* "Descended from Immigrants and Revolutionists: How Family Immigration History Shapes Legislative Behavior in Congress" (with James Feigenbaum and Benjamin Schneer). "The Gender Pay Gap in Congressional Offices" (with Joshua McCrain). "Racial Disparities in Local Elections" (with Katherine Levine Einstein). "Renters in an Ownership Society: Property Rights, Voting Rights, and the Making of American Citizenship." Book Project. With Katherine Levine Einstein. "Menino Survey of Mayors 2021." Co-principal investigator with David M. Glick and Katherine Levine Einstein.

GRANTS
AND AWARDS

The Boston Foundation Grant. "2022 Greater Boston Housing Report Card" (Co-principal investigator). 2022. $70,000.

The Rockefeller Foundation, "Menino Survey of Mayors" (Co-principal investigator). 2021. $355,000.

American Political Science Association, Heinz Eulau Award, for the best article published in *Perspectives on Politics* during the previous calendar year, for "Who Participates in Local Government? Evidence from Meeting Minutes." (with Katherine Levine Einstein and David M. Glick). 2020.

Boston University Initiative on Cities, COVID-19 Research to Action Seed Grant. "How Are Cities Responding to the COVID-19 Housing Crisis?" 2020. $8,000.

The Rockefeller Foundation, "Menino Survey of Mayors" (Co-principal investigator). 2017. $325,000.

Hariri Institute for Computing, Boston University. Junior Faculty Fellow. 2017–2020. $10,000.

The Rockefeller Foundation, "2017 Menino Survey of Mayors" (Co-principal investigator). 2017. $100,000.

The Center for Finance, Law, and Policy, Boston University, Research Grant for "From the Capitol to the Boardroom: The Returns to Office from Corporate Board Directorships," 2015.

Senator Charles Sumner Prize, Dept. of Government, Harvard University. 2014.
   Awarded to the best dissertation "from the legal, political, historical, economic, social or ethnic approach, dealing with means or measures tending toward the prevention of war and the establishment of universal peace."

The Center for American Political Studies, Dissertation Research Fellowship on the Study of the American Republic, 2013–2014.

The Tobin Project, Democracy and Markets Graduate Student Fellowship, 2013–2014.

The Dirksen Congressional Center, Congressional Research Award, 2013.

The Institute for Quantitative Social Science, Conference Travel Grant, 2014.

The Center for American Political Studies, Graduate Seed Grant for "Capitol Gains: The Returns to Elected Office from Corporate Board Directorships," 2014.

The Institute for Quantitative Social Science, Research Grant, 2013.

Bowdoin College: High Honors in Government and Legal Studies; Philo Sherman Bennett Prize for Best Honors Thesis in the Department of Government, 2008.

SELECTED PRESENTATIONS

"A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure." MIT Election Data and Science Lab, 2020.

"Who Represents the Renters?" Local Political Economy Conference, Washington, D.C., 2019.

"Housing and Climate Politics," Sustainable Urban Systems Conference, Boston University 2019.

"Redistricting and Gerrymandering," American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2019.

"The Participatory Politics of Housing," Government Accountability Office Seminar, 2018.

"Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Immigration Votes in Congress," Congress and History Conference, Princeton University, 2018.

"Identifying Gerrymanders at the Micro- and Macro-Level." Hariri Institute for Computing, Boston University, 2018.

"How Institutions Enable NIMBYism and Obstruct Development," Boston Area Research Initiative Spring Conference, Northeastern University, 2017.

"Congressional Gridlock," American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2016.

"Capitol Gains: The Returns to Elected Office from Corporate Board Directorships," Microeconomics Seminar, Department of Economics, Boston University, 2015.

"A Two Hundred-Year Statistical History of the Gerrymander," Congress and History Conference, Vanderbilt University, 2015.

"A New (Old) Standard for Geographic Gerrymandering," Harvard Ash Center Workshop: How Data is Helping Us Understand Voting Rights After Shelby County, 2015.

"Capitol Gains: The Returns to Elected Office from Corporate Board Director-
ships," Boston University Center for Finance, Law, and Policy, 2015.

"Capitol Gains: The Returns to Elected Office from Corporate Board Director-
ships," Bowdoin College, 2014.

American Political Science Association: 2013, 2014, 2015, 2016, 2018, 2019, 2020
Midwestern Political Science Association: 2012, 2013, 2014, 2017, 2019
Southern Political Science Association: 2015, 2018
European Political Science Association: 2015

EXPERT
TESTIMONY
AND CONSULTING

Bethune-Hill v. Virginia (3:14-cv-00852-REP-AWA-BMK), U.S. District Court for
the Eastern District of Virginia. Prepared expert reports and testified on racial
predominance and racially polarized voting in selected districts of the 2011 Vir-
ginia House of Delegates map. (2017)

Thomas v. Bryant (3:18-CV-441-CWR-FKB), U.S. District Court for the Southern
District of Mississippi. Prepared expert reports and testified on racially polarized
voting in a district of the 2012 Mississippi State Senate map. (2018–2019)

Chestnut v. Merrill (2:18-cv-00907-KOB), U.S. District Court for the Northern
District of Alabama. Prepared expert reports and testified on racially polarized
voting in selected districts of the 2011 Alabama congressional district map. (2019)

Dwight v. Raffensperger (No. 1:18-cv-2869-RWS), U.S. District Court for the
Northern District of Georgia. Prepared expert reports and testified on racially
polarized voting in selected districts of the 2011 Georgia congressional district
map. (2019)

Bruni, et al. v. Hughs (No. 5:20-cv-35), U.S. District Court for the Southern Dis-
trict of Texas. Prepared expert reports and testified on the use of straight-ticket
voting by race and racially polarized voting in Texas. (2020)

Caster v. Merrill (No. 2:21-cv-1536-AMM), U.S. District Court for the Northern
District of Alabama. Prepared expert report and testified on racially polarized
voting in selected districts of the 2021 Alabama congressional district map. (2022)

Pendergrass v. Raffensperger (1:21-CV-05339-SCJ), U.S. District Court for the North-
ern District of Georgia. Prepared expert reports and testified on racially polarized
voting in selected districts of the 2021 Georgia congressional district map. (2022)

Grant v. Raffensperger (1:22-CV-00122-SCJ), U.S. District Court for the North-
ern District of Georgia. Prepared expert reports and testified on racially polar-
ized voting in selected districts of the 2021 Georgia state legislative district maps.

(2022)

Galmon, et al. v. Ardoin (3:22-cv-00214-SDD-SDJ), U.S. District Court for the Middle District of Louisiana. Prepared expert reports and testified on racially polarized voting for the 2021 Louisiana congressional district map. (2022)

Racially Polarized Voting Consultant, Virginia Redistricting Commission, August 2021.

The General Court of the Commonwealth of Massachusetts, Joint Committee on Housing, Hearing on Housing Production Legislation. May 14, 2019. Testified on the role of public meetings in housing production.

TEACHING
Boston University

- *Introduction to American Politics* (PO 111; Fall 2014, Fall 2015, Fall 2016, Fall 2017, Spring 2019, Fall 2019, Fall 2020)
- *Congress and Its Critics* (PO 302; Fall 2014, Spring 2015, Spring 2017, Spring 2019)
- *Data Science for Politics* (PO 399; Spring 2020, Spring 2021, Fall 2021, Fall 2022)
- *Formal Political Theory* (PO 501; Spring 2015, Spring 2017, Fall 2019, Fall 2020)
- *American Political Institutions in Transition* (PO 505; Spring 2021, Fall 2021)
- *Prohibition* (PO 540; Fall 2015, Fall 2022)
- *Political Analysis (Graduate Seminar)* (PO 840; Fall 2016, Fall 2017)
- *Graduate Research Workshop* (PO 903/4; Fall 2019, Spring 2020)

SERVICE
Boston University

- Research Computing Governance Committee, 2021–.
- Initiative on Cities Faculty Advisory Board, 2020–2022.
- Undergraduate Assessment Working Group, 2020-2021.
- College of Arts and Sciences
  - Search Committee for the Faculty Director of the Initiative on Cities, 2020–2021.
  - General Education Curriculum Committee, 2017–2018.
- Department of Political Science
  - Director of Advanced Programs (Honors & B.A./M.A.). 2020–.
  - Political Methodology Search Committee, 2021.

- Delegate, Chair Selection Advisory Process, 2021.
- Comprehensive Exam Committee, American Politics, 2019.
- Comprehensive Exam Committee, Political Methodology, 2016, 2017, 2021.
- Co-organizer, Research in American Politics Workshop, 2016–2018.
- American Politics Search Committee, 2017.
- American Politics Search Committee, 2016.
- Graduate Program Committee, 2014–2015, 2018–2019, 2020–2021.

Co-organizer, *Boston University Local Political Economy Conference*, August 29, 2018.

Editorial Board Member, *Legislative Studies Quarterly*, 2020–Present

Malcolm Jewell Best Graduate Student Paper Award Committee, Southern Political Science Association, 2019.

Reviewer: *American Journal of Political Science*; *American Political Science Review*; *Journal of Politics*; *Quarterly Journal of Political Science*; *Science*; *Political Analysis*; *Legislative Studies Quarterly*; *Public Choice*; *Political Science Research and Methods*; *Journal of Law, Economics and Organization*; *Election Law Journal*; *Journal of Empirical Legal Studies*; *Urban Affairs Review*; *Applied Geography*; *PS: Political Science & Politics*; Cambridge University Press; Oxford University Press.

Elected Town Meeting Member, Town of Arlington, Mass., Precinct 2. April 2021–Present.

Arlington Election Reform Committee Member, August 2019–April 2022.

Coordinator, Harvard Election Data Archive, 2011–2014.

OTHER EXPERIENCE	**Charles River Associates**, Boston, Massachusetts	2008–2010

Associate, Energy & Environment Practice
Economic consulting in the energy sector for electric and gas utilities, private equity, and electric generation owners. Specialized in Financial Modeling, Resource Planning, Regulatory Support, Price Forecasting, and Policy Analysis.

Updated December 12, 2022

EXHIBIT A

Page 1

1   UNITED STATES DISTRICT COURT
          FOR THE NORTHERN DISTRICT OF GEORGIA
2   ATLANTA DIVISION

3

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)
5   COAKLEY PENDERGRASS, ET AL.,   ) CIVIL ACTION NO.
) 1:21-CV-05339-SCJ
6   PLAINTIFFS,   )
)
7   v.   )
)
8   BRAD RAFFENSPERGER, ET AL.,   )
)
9   DEFENDANTS.   )

10

11

12

13   DEPOSITION OF WILLIAM S. COOPER

14   (TAKEN by DEFENDANTS)

15   ATTENDING VIA ZOOM IN BRISTOL, VIRGINIA

16   FEBRUARY 14, 2023

17

18

19

20   REPORTED BY: Meredith R. Schramek
                         Registered Professional Reporter
21   Notary Public
                         (Via Zoom in Mecklenburg County,
22   North Carolina)

23

24

25

William S. Cooper   February 14, 2023
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1   Q   So if a plan split fewer counties than your

2   illustrative plan, you wouldn't say that your

3   illustrative plan was inconsistent with the principle

4   of keeping jurisdictions whole?

5   A   No. Because you're constantly balancing

6   things.

7   Q   And so there's -- for Georgia, there's no

8   objective number of county splits that makes a plan

9   consistent with the traditional principle of keeping

10   counties whole; is that right?

11   A   Well, ultimately, there would be. But I --

12   you know, it's difficult to give you a number because

13   there are some very small counties and some large

14   counties and so it could vary. And -- so I'm unable to

15   tell you exactly what the threshold would be.

16   I've -- in the latest plan, the plan that's

17   part of my November 2020 -- December 2022 declaration,

18   I've split one fewer county -- or one less county. And

19   there are, I think, 18 county splits total compared to

20   21 in the state plan.

21   So I assume that's sufficient since I've

22   been -- done better than the State did in that respect.

23   Q   But you wouldn't say that the State's plan

24   was inconsistent with the traditional principle of

25   keeping counties whole just because your plan splits

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 1    one fewer, would you?

 2         A     No.

 3         Q     On that --

 4         A     Just looking at -- from the perspective of

 5    splits of political subdivisions, no.

 6         Q     Okay.  You mentioned the compactness scores

 7    and the compactness of the districts.

 8              How do you determine that a plan is

 9    consistent with the traditional redistricting principle

10    of compactness?

11         A     Well, that's very tricky because states and

12    towns and precincts can have odd shapes and so that

13    would vary from state to state and district to

14    district.  A coastal district, for example, might score

15    very low on Polsby-Popper because of all the ins and

16    outs of a coastline or a river.

17              So it's a very -- it seems to be an objective

18    score, but it ends up being so much subjective in terms

19    of how you interpret it.  But I don't think there's any

20    question that the illustrative plan I've drawn is

21    acceptable in terms of compactness based on the Reock

22    and Polsby-Popper scores.

23         Q     Is there a range for the Reock and

24    Polsby-Popper scores that is unacceptable for

25    compactness?
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1   A   There is not necessarily. I do think that at

2   some point, at least in terms of drawing districts that

3   are not affected by a coastline or a municipal boundary

4   or some other potential subdivision like a precinct,

5   that once you get into the low single digits, become

6   somewhat problematic.

7   But you can have situations like, say, the

8   infamous "snake on the lake" in Ohio that stretches --

9   it was the old snake on the lake that went from

10   downtown Cleveland all the way to Toledo, a narrow

11   strip of land along the lake. It actually had a very

12   high Polsby-Popper score, and that was, of course, very

13   misleading and that was because it had precincts that

14   extended out into Lake Erie because a couple of those

15   islands in the lake are populated. So that "snake on

16   the lake" congressional district had a reasonably high

17   compactness score even though it was not at all

18   compact.

19   Q   Do you use or display the Reock and

20   Polsby-Popper scores on the screen as you're drawing a

21   plan, or do you just check them once the plan is

22   complete?

23   A   I will look at them occasionally, but I don't

24   routinely check them. The latest version of Maptitude

25   does allow you to do that from the data view, but I

1   basically just ignore that until I'm interested.

2   Q   So within Maptitude, you don't use the

3   display of the compactness score as you're drawing?

4   You have to stop and run a report to see that

5   information?

6   A   Well, it's there. But normally I would just

7   run the report because I use just visual assessments

8   basically as I'm drawing a plan so that I would

9   hopefully check it if I thought the plan was starting

10   to look a little strange. So needless to say, with

11   respect to this congressional plan, I never checked it

12   because it looks good from the start.

13   Q   And I believe we discussed the traditional

14   redistricting principle of incumbency doesn't really

15   apply on a congressional plan because incumbents can

16   live anywhere in the state; right?

17   A   That's my understanding.

18   Q   And so when you say in paragraph 10 that this

19   district is "consistent with traditional redistricting

20   principles," the new district, are you saying anything

21   beyond it splits a similar number of counties, it has a

22   similar compactness score, and its equal population to

23   other districts in the state?

24   A   Well, as I've mentioned, one must factor

25   in -- I mean, again, this is very subjective --

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1   cultural and historical information and, above all, of

2   course, one must take into account minority voting

3   strengths and whether or not the plan is, you know, not

4   protecting minorities under Section 2.

5   Q   Okay. So you referenced historical and

6   cultural connections. Do I have that right?

7   A   Yes, generally speaking.

8   Q   Okay. How do you determine if a plan is

9   consistent with the traditional principle of historical

10   and cultural connections?

11   A   It's subjective. I mean, it's a community of

12   interest, which is entirely subjective. I think I've

13   likened it to pinning Jell-O to a wall because everyone

14   can have a different definition.

15   Q   So your determination that your plan complies

16   with the traditional principle of maintaining

17   historical and cultural connections is just your view

18   and there's not a specific definition for how that

19   complies?

20   A   I don't think there would be a specific

21   definition, no. It's very general. And different

22   people can come to different conclusions, obviously.

23   Q   You also referenced minority voting strength

24   as a traditional redistricting principle.

25   How do you go about determining that the

1   illustrative plan complies with the traditional

2   principle of maintaining minority voting strength?

3   A   Or not diluting minority voting strengths?

4   Q   Or not diluting.

5   A   Well, to a large degree, I would rely on the

6   attorneys' interpretation of the statistical work done

7   by the individual who's working on the Gingles 2 and

8   Gingles 3 analysis, expert analysis.

9   Q   So as a map drawer, are there any steps you

10   take apart from reliance on the attorneys for

11   maintaining the traditional principle of not diluting

12   minority voting strength?

13   A   Well, I mean, just my general background

14   depending on the circumstances. I mean, in Georgia I

15   know, for example, that there are two districts that

16   are actually slightly under 50 percent black voting age

17   population, District 2 and District 5. So it would

18   appear in Metro Atlanta, a district that is around

19   50 percent black is a competitive district that could

20   be a so-called minority opportunity district. That

21   might not be the case in the delta of Mississippi, but

22   it just depends.

23   Q   And specifically for District 6 -- again, not

24   asking for anything that you relied on the lawyers for

25   in this case, but as a map drawer, did you determine

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1   that the dilution of minority voting strength was met

2   as a traditional principle because District 6 was over

3   50 percent?

4   A   Well, yes. It's over 50 percent. And so for

5   that reason, along with evidence that minorities have

6   been elected even in districts that are under

7   50 percent, I reached that conclusion, which was

8   confirmed, I suppose, in the Gingles 2 and Gingles 3

9   analysis in this case.

10   Q   So, again, kind of getting back to your

11   conclusion that the new CD 6 is drawn consistent with

12   traditional redistricting principles, what you mean by

13   the phrase "consistent with traditional redistricting

14   principles" is that it meets population equality by

15   being plus or minus zero, it splits a number of

16   counties and precincts similar to the enacted plan, the

17   compactness scores are similar to the enacted plan, in

18   your opinion, historical and cultural connections are

19   maintained, and the district is over 50 percent black

20   VAP.

21   Is there anything else that is included in

22   the phrase "consistent with traditional redistricting

23   principles" in paragraph 10?

24   A   Well, reasonably shaped and compact. I don't

25   think you mentioned that. And the district should be

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 1    contiguous unless the jurisdiction in question is not

 2    contiguous.  So those are other factors that I took

 3    into consideration.

 4         Q    On any other factors that you took into

 5    consideration that we've not talked about that are

 6    included in that phrase "consistent with traditional

 7    redistricting principles"?

 8         A    I think we've covered them, but I reserve the

 9    right to interject another one if I suddenly think that

10    maybe we didn't.

11         Q    Understood.  But as of right now, you can't

12    think of another one; is that right?

13         A    As of right now, I don't have any other one

14    top of mind.

15         Q    Let's go next to paragraph 11 of your report.

16    And you reference that you don't change districts -- 6

17    of the 14 districts on the enacted 2021 plan; correct?

18         A    Correct.

19         Q    And so in order to draw the new majority

20    black Congressional District 6, you've had to change,

21    on the illustrative plan, 8 of the 14 districts from

22    the enacted plan; right?

23         A    I don't know if I had to change eight, but --

24    I suppose it's possible I could have changed fewer than

25    eight.  I don't know.
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1   A   I think it's synonymous.

2   Q   Synonymous? So it's the same thing?

3   A   Yes.

4   Q   And then I know we talked about communities

5   of interest a little while ago.

6   Looking at illustrative District 6 in

7   Figure 10 there on page 20, what are the communities of

8   interest that you can identify located in illustrative

9   District 6?

10   A   Well, illustrative District 6 is largely

11   suburban/exurban Atlanta. So it's part of the Atlanta

12   core counties, the 11 core counties, which are also

13   part of the Atlanta MSA. So there are economic and

14   transportation commonalities there, lots of small

15   cities. It can get sort of rural once you get out into

16   western Douglas County, for example. I took a little

17   spin around the district in -- on Saturday after our

18   deposition on Friday of last week and visited parts of

19   Douglas and extended all the way -- drove actually

20   almost halfway to Villa Rica.

21   I guess you say it differently though, don't

22   you? How do you say that?

23   Q   We say "Villa Rica." That's where my Tysons

24   are from actually, is in Villa Rica.

25   A   Pardon?

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1   Hancock and other counties, Taliaferro in eastern

2   Georgia being part of a new majority black state senate

3   district that you created in one of the other cases;

4   right?

5   A   We have discussed that in the other case.

6   Q   So can you tell me what the community of

7   interest is between majority black Hancock County and

8   the Appalachian Mountains and Rabun and Towns County on

9   the North Carolina border?

10   A   Well, again, the connection is not very

11   strong, but one has to balance out the populations so

12   that you have 14 districts that are roughly 765,000

13   people. So, again, there would be other ways to draw

14   it.

15   Q   So, Mr. Cooper, when you talked about, in

16   paragraph 48, the illustrative plan adhering to

17   traditional principles and you listed the various

18   principles, it sounds like what you're saying is

19   population equality is really the most important

20   principle even more so than being able to explain where

21   there's communities of interest between different parts

22   of districts.

23   Do I have that right?

24   A   Well, actually I think you do. It's a

25   nonstarter. If it doesn't meet population equality or

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1   something very close to plus or minus one, then it's a

2   nonstarter. Right?

3   Q   And so then after population equality, what

4   other traditional redistricting principles explain the

5   configuration of District 10 on the illustrative plan?

6   A   I was following county boundaries. I think

7   there's a split of Wilkes County. And I believe

8   Lumpkin County, but there are no other county splits I

9   believe, unless -- maybe Hall County is split.

10   But I was attempting to draw a plan that was

11   reasonably compact, reasonably shaped that -- I had the

12   information about the incumbents, I think, at maybe the

13   latter stage of drawing the plan. So I was probably

14   attempting to avoid placing a couple of incumbents who

15   live very close to one another in the Jackson County

16   area, I think. I was attempting to put them, maybe, in

17   different districts even though I understand they don't

18   have to be, I believe. I'm not looking at the

19   incumbents right now and haven't done so since

20   December.

21   Q   So, Mr. Cooper, in paragraph 48, I didn't see

22   where you listed incumbents as a traditional principle

23   as part of the illustrative plan, and thought that we

24   had talked about earlier that incumbency wasn't as

25   important.

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1   Did you use incumbency data in the drawing of

2   the illustrative plan?

3   A   I was sort of aware of where I thought the

4   incumbents lived. It's always in the background. So

5   that was in the background.

6   Q   So beyond incumbency and keeping counties

7   whole minus Hall, Lumpkin, and Wilkes Counties, and

8   population equality, are there any other traditional

9   redistricting principles that went into the districting

10   of District 10?

11   A   Well, I had to make the plan reasonably

12   compact. I tried to follow county boundaries. The

13   district's contiguous. It looks as compact as the

14   districts that have been drawn in the enacted plan.

15   But it could be drawn differently.

16   Q   But you'd agree that there's not a community

17   of interest between majority black Hancock County and

18   Rabun County in extreme northwest Georgia, wouldn't

19   you?

20   A   They are different. They are different. And

21   so I am open to other suggestions for how one might

22   draw District 10.

23   Q   And I understand they're different. My

24   question was: You'd agree there's not a community of

25   interest between Hancock and Rabun counties; right?

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1   A   Well, not entirely. Because most counties

2   are quite poor. And in Rabun County, you'd be talking

3   about poor whites. And in Hancock County, a fairly

4   significant black population that is not experiencing

5   prosperity. So there are connections there. There are

6   connections in that regard.

7   Q   So you believe a community of interest in

8   illustrative District 10 would be poor white voters in

9   the Rabun and similar socioeconomic status black voters

10   in Hancock County?

11   A   Could be. Could be. On certain

12   socioeconomic issues.

13   Q   Was that the community of interest you

14   considered when you drew illustrative District 10?

15   A   When I was drawing District 10, I was mainly

16   trying to avoid splitting counties and meet one person,

17   one vote requirements. And I was aware that there are

18   different areas in the sense that Rabun County is

19   Appalachian and that parts of the southern end of

20   District 10 are in the historic black belt.

21   Q   And you'd agree that Athens and Clark County

22   is included in District 10 on the illustrative plan;

23   right?

24   A   That's right. There's a university there.

25   Q   And --

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 1    District 13 in Clayton County begins near the Atlanta

 2    airport as you've drawn it?

 3         A    Yes.

 4         Q    And you'd agree that Butts and Jasper

 5    Counties on the eastern side of District 13 as drawn

 6    are rural counties; right?

 7         A    They are rural, but still part of Metro

 8    Atlanta.  In other words, the Census Bureau has

 9    determined that there's a 29-county area where there

10    are commuting and transportation ties that are

11    significant enough to put those counties into Metro

12    Atlanta.

13         Q    But you agree that District 13 as drawn

14    connects urban areas in Clayton County with rural areas

15    in Fayette, Spalding, Butts, and Jasper Counties;

16    right?

17         A    Yes.

18         Q    Are you aware that the only majority black

19    portions of any county in District 13 as drawn is the

20    portions in Clayton and Newton Counties?

21         A    Well, there's obviously black population and

22    significant black population in some of the other

23    counties.  Henry County is almost majority black.  It's

24    50/50.  And the black population is growing.  Fayette

25    County has a significant black population that is
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1   growing.

2   So I'm not -- I'm just not that focused on

3   the pieces of a particular county in terms of the

4   actual percentages involved, but I do know there's

5   significant black population in the area that comprises

6   District 13, including South Metro counties like

7   Spalding and, of course, Fayette and Henry.

8   Q   Okay. Let's take a look at that. Exhibit

9   Number I-3 of your declaration, this is the plan

10   components report for the illustrative plan; right?

11   A   Right.

12   Q   And this shows, for the portion of each

13   county located in a district, what the population and

14   racial breakdown of the portions of those counties in

15   that district is; right?

16   A   Right. And I'll stress that this was

17   reported after the plan had been completed. In other

18   words, I was focusing on what the component parts were

19   as I was drawing the plan.

20   Q   And so looking at District 13, do you agree

21   that the portion of Butts County in District 13 is

22   27.80 percent AP black VAP; right?

23   A   Right. It's a significant black population.

24   Q   Right. And Clayton, the portion in Clayton

25   is 71.9 percent AP black VAP?

EXHIBIT B

Case 1:21-cv-05339-SCJ   Document 203-2   Filed 05/03/23   Page 2 of 8

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Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

_____
)
COAKLEY PENDERGRASS, et al.,   )
)
          Plaintiffs,   )
     vs.   )
) Civil Action No.
BRAD RAFFENSPERGER, in his   ) 2:21-CV-05449-SCJ
official capacity as the   )
Georgia Secretary of State,   )
et al.,   )
)
          Defendants.   )
_____)
)
ANNIE LOIS GRANT, et al.,   )
)
          Plaintiffs,   )
     vs.   ) Civil Action No.
) 1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his   )
official capacity as the   )
Georgia Secretary of State,   )
et al.,   )
)
          Defendants.   )
_____)

 Videotaped deposition of DR. JOHN ALFORD, taken
 remotely in the above-captioned cause, before
 Rachel F. Gard, CSR, RPR, CRR, commencing at
 the hour of 11:00 a.m. Eastern on Thursday,
 February 23, 2023.

_____
                DIGITAL EVIDENCE GROUP
           1730 M Street, NW, Suite 812
               Washington, D.C. 20036
                  (202) 232-0646

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 1      A  -- is a cue, doesn't mean it's a cue,

 2    therefore that creates this causal tumble or

 3    whatever.  But if the information is available to

 4    the voters, therefore it's one of the things they

 5    may be acting on because it is apparent to them

 6    and it's something they actually know about,

 7    people act on things that they don't -- that

 8    they're not cognizant of, but certainly the things

 9    they are cognizant of can be important.

10         Again, by "racial cue," I mean that

11    information is available to the voters when

12    they're making the decision, and I'm not really

13    going beyond that with the evidence we have here.

14      Q  Okay.  Would you agree that the race of a

15    candidate is not the only role race plays or race

16    might play in a voter's political behavior?

17      A  Yes.

18      Q  And, in fact, race might play -- again, we

19    don't -- kind of removing ourselves from the data

20    here and speaking more just abstractly or

21    theoretically, race might play a tremendously

22    important role in a voters' decision or how they
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1   vote or what their political beliefs are. Do you

2   think that's a fair statement?

3   MR. JACOUTOT: Object to form.

4   A We're saying it might, yes. It might; it

5   might not. I think yeah, there's certainly room

6   for race to be involved in decision-making in a

7   wide variety of ways.

8   Q And what -- and now looking at the data we

9   have in front of us, we know how -- to put it

10   plainly, we know how black voters vote in Georgia

11   and we know how white voters vote in Georgia,

12   correct?

13   A Right, in a limited sense of, you know,

14   our prediction about which candidates they prefer

15   in the general elections, yes.

16   Q But what that data does not necessarily

17   tell us is the degree to which race is influencing

18   those decisions?

19   A So yes, it does. It can answer questions

20   about all or a variety of ways in which

21   speculatively race might influence decision, but I

22   guess the way I would answer that is to say, I

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 1   of other possibilities, right.

 2   Q   Right.

 3   A   So again, that's a different sort of scope

 4   question. The question -- the question is, does

 5   it in any way suggest that that might be true or

 6   does it give us any sense of how likely that is.

 7   And I think common sense, if you're saying

 8   something as important in U.S. politics as

 9   choosing a party, in choosing candidates based on

10   issues is being driven by race, right, so I'm

11   making my party choice entirely on the basis of

12   race because that's how important race is with me,

13   and then when confronted with a racially contested

14   election, it makes no difference at all.

15   So I just find -- again, this is -- you

16   think of it as sort of obvious. If Republicans

17   choose to be Republicans and it's really all about

18   being white and that being a white party that

19   doesn't support -- that doesn't support blacks,

20   then it's just really hard to get your head around

21   how they nominated Herschel Walker. I mean, it's

22   strategically hard to understand how they got

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 1    around to nominating Herschel Walker.  But

 2    racially, how is it these same voters who

 3    structure their entire political universe around

 4    race become completely indifferent to the race of

 5    candidates, right.  There may be some way for that

 6    to happen.  Again, I think you have to accept that

 7    that becomes -- it's not just -- we can never

 8    exclude all of the strange possibilities out of

 9    the world, but we can certainly assign

10    probabilities to them.

11         And if there was something going on like

12    you're suggesting, it's really hard to see why it

13    wouldn't leave any -- to continue to provide some

14    evidence of it at the level of the idea that if I

15    chose being a Democrat or a Republican on the

16    basis of race, I then would treat black and white

17    candidates with complete indifference as to race

18    seems like an odd line to draw in your political

19    universe.

20         Q  So I guess --

21         A  It's not impossible, but it's unlikely.

22    And if you think that's true, I'd suggest
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 1   providing some evidence that it's true because I

 2   just don't think the burden of proof strikes me

 3   here not as the burden of just demonstrating that

 4   something is not impossible.

 5       Q  But you have done -- your expert report

 6   doesn't include any opinions on these questions?

 7   To put it more specifically, you have not examined

 8   the reasons why voters make their decisions,

 9   correct?

10       A  I think it's outside the scope of what

11   experts do in these cases, just generally, to have

12   a thing about how voters make decisions.  So

13   there's some evidence here.  It's exactly the sort

14   of evidence that's always in these cases, it's

15   always relies on, it's always done in reliable

16   fashion.  It suggests the connections we talked

17   about.

18          And then if your question is have I tried

19   to show -- have I tried to demonstrate this

20   possible but highly unlikely other thing, have I

21   tried to find out if it is there or if I tried to

22   prove that it isn't there, I am not.  I don't -- I
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1   preference or party identification, and if the

2   pattern that you observe indicates that

3   polarization in Georgia is attributable to party,

4   then it's also true, then, that that polarization

5   might be attributable to race through party. Is

6   that fair?

7   MR. JACOUTOT: Object to form.

8   A So I'll say just to make sure that I'm not

9   quoted out of context.

10   Q Sure.

11   A Not that you would do that but somebody

12   else might. We're just restating what I think we

13   said already, is this a possibility? Yes. Is

14   this something you could do empirical work on and

15   establish? Yes. And again, is there anything in

16   Dr. Palmer's report that in any way establishes

17   that that's true in Georgia empirically? The

18   answer is no.

19   So there's not in evidence here. It's not

20   in his report. And if he puts it in his report,

21   I'd have a chance to respond to it and we can

22   debate, is this real, is it the right evidence, is

Expert Report of Dr. Maxwell Palmer

Pendergrass v. Raffensperger (N.D. Ga.)

December 12, 2022

EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. I was promoted to Associate Professor, with tenure, in 2021. I am also a Civic Tech Fellow in the Faculty of Computing & Data Sciences and a Faculty Fellow at the Initiative on Cities. I teach and conduct research on American politics and political methodology.

2. I have published academic work in leading peer-reviewed academic journals, including the *American Political Science Review*, *Journal of Politics*, *Perspectives on Politics*, *British Journal of Political Science*, *Journal of Empirical Legal Studies*, *Political Science Research and Methods*, *Legislative Studies Quarterly*, and *Urban Affairs Review*. My book, *Neighborhood Defenders: Participatory Politics and America's Housing Crisis*, was published by Cambridge University Press in 2019. I have also published academic work in the *Ohio State University Law Review*. My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations, and data sources including academic surveys, precinct-level election results, voter registration and vote history files, and census data. My curriculum vitae is attached to this report.

3. I have served as an expert witness or litigation consultant on numerous cases involving voting restrictions. I testified at trial, court hearing, or by deposition in *Bethune Hill v. Virginia* before the U.S. District Court for the Eastern District of Virginia (No. 3:14-cv-00852-REP-AWA-BMK); *Thomas v. Bryant* before the U.S. District Court for the Southern District of Mississippi (No. 3:18-CV-00441-CWR-FKB); *Chestnut v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:18-cv-00907-KOB); *Dwight v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:18-cv-2869-RWS); *Bruni v. Hughs* before the U.S. District Court for the Southern District of Texas (No. 5:20-cv-35); *Caster v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:21-cv-1536-AMM); *Pendergrass v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:21-CV-05339-SCJ); *Grant v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:22-CV-00122-SCJ); and *Galmon v. Ardoin* before the U.S. District Court for the Middle District of Louisiana (3:22-cv-00214-SDD-SDJ). I also served as the independent racially polarized voting analyst for the Virginia Redistricting Commission in 2021, and I have worked as a consultant to the United State Department of Justice on several matters. My expert testimony has been accepted and relied upon by courts; in no case has my testimony been rejected or

1

found unreliable.

4. I am being compensated at a rate of \$350 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

5. I testified in this matter in the preliminary injunction proceedings on February 10, 2022. I was accepted by the court as an expert in redistricting and data analysis.

6. I was retained by the plaintiffs in this litigation to offer an expert opinion on the extent to which voting is racially polarized in Northwest Georgia. I was also asked to evaluate the performance of the 6th Congressional District in the plaintiffs' illustrative map.

7. I find strong evidence of racially polarized voting across the focus area, which is comprised of the 3rd, 6th, 11th, 13th, and 14th Congressional Districts under the 2021 redistricting map.[1] Black and White voters consistently support different candidates. On average, I estimate that 98.4% of Black voters support the same candidate, while only 12.4% of White voters support the Black-preferred candidate. I also find strong evidence of racially polarized voting in each of the five individual congressional districts.

8. Black-preferred candidates are largely unable to win elections in the focus area. Across an analysis of 40 statewide elections from 2012 to 2022, the Black-preferred candidate lost every election in the focus area. When taken on a district-by-district basis, the Black-preferred candidate was defeated in every one of the 40 elections analyzed in the 3rd, 6th, 11th, and 14th Congressional Districts. The Black-preferred candidate won a majority of the vote in the 13th Congressional District in all 40 elections.

9. Under the plaintiffs' illustrative map, I find that Black-preferred candidates are able to win elections in the new 6th Congressional District. Across 31 statewide elections from 2012 to 2021, the Black-preferred candidate won an average of 66.1% of the vote in this illustrative district.[2]

Data Sources and Elections Analyzed

10. For the purpose of my analysis, I examined elections in the 3rd, 6th, 11th, 13th, and 14th Congressional Districts, under the plan adopted by the state legislature in 2021. Collectively, I refer to this area as the "focus area." Figure 1 maps the focus area.

11. To analyze racially polarized voting, I relied on precinct-level election results and voter turnout by race, compiled by the state of Georgia. The data includes the racial breakdown of registrants and voters in each precinct, based on registrants' self-identified race when registering to vote. Data for the 2012, 2014, 2016, and 2018 general elections

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[1] In my expert report for the preliminary injunction hearing, I defined the focus area as the 3rd, 11th, 13th, and 14th Congressional Districts. I added the 6th District to the focus area in this report because the plaintiff's revised illustrative map now includes a portion of the 6th District in the new majority-minority district.

[2] As discussed below, I was not able to include the 2022 general elections in this analysis because 2022 precinct geography data was not available.
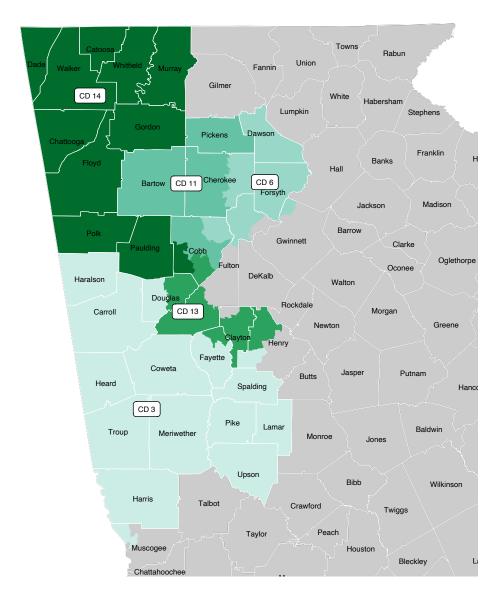
Figure 1: Map of the Focus Area

was provided to counsel by the Georgia Secretary of State in a prior case.[3] Data on turnout by race for the 2020 general election and the 2018 and 2021 runoff elections was retrieved from the website of the Georgia Secretary of State.[4] Data on turnout by race for the 2022 general election was provided to counsel by the Georgia Secretary of State, and 2022 precinct-level election results were downloaded from the the website of the Georgia Secretary of State.[5] Precinct-level election results for the 2018[6], 2020, and

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[3] *Dwight v. Raffensperger* (No. 1:18-cv-2869-RWS).

[4] https://sos.ga.gov/index.php/Elections.

[5] https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary.

[6] Voting and Election Science Team, 2019, "2018 Precinct-Level Election Results", https://doi.org/10.7910/DVN/UBKYRU, Harvard Dataverse, V47; ga_2018.zip.

2021[7] elections was assembled by the Voting and Election Science Team, an academic group that provides precinct-level data for U.S. Elections, based on data from the Secretary of State.[8,9] Precinct shape files for 2012 through 2020 were downloaded from the Georgia General Assembly's Legislative and Congressional Reapportionment Office.[10]

12. The state of Georgia provides six options for race and ethnicity on the voter registration form: Black, White, Hispanic/Latino, Asian/Pacific Islander, American Indian, and Other.[11] I combined Hispanic/Latino, Asian/Pacific Islander and American Indian into the "Other" category.

Racially Polarized Voting Analysis

13. In analyzing racially polarized voting in each election, I used a statistical procedure, ecological inference (EI), that estimates group-level preferences based on aggregate data. I analyzed the results for three racial demographic groups: Non-Hispanic Black, Non-Hispanic White, and Other, based on the voters' self-identified race in the voter registration database. I excluded third party and write-in candidates, and analyzed votes for the two major-party candidates in each election. The results of this analysis are estimates of the percentage of each group that voted for the candidate from each party in each election. The results include both a mean estimate (the most likely vote share) and a 95% confidence interval.[12]

14. Interpreting the results of the ecological inference models proceeds in two general stages. First, I examined the support for each candidate by each demographic group to determine if members of the group vote cohesively in support of a single candidate in each election. When a significant majority of the group supports a single candidate, I can then identify that candidate as the group's candidate of choice. If the group's support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate and does not have a clear preference. Second, after identifying the preferred candidate for each group (or the lack of such a candidate), I compared the preferences of White voters to the preferences of Black voters. Evidence of

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[7]Voting and Election Science Team, 2020, "2020 Precinct-Level Election Results", https://doi.org/10.7910/DVN/K7760H, Harvard Dataverse, V21; ga_2020.zip. Note that the 2020 election results file includes the 2021 runoff election results as well.

[8]The election results provided by VEST are the same as the precinct-level data available on the website of the Georgia Secretary of State. However, VEST provides the data in a more convenient format.

[9]As of December 12, 2022, precinct-level voter turnout data for the 2022 runoff election was not available.

[10]https://www.legis.ga.gov/joint-office/reapportionment.

[11]https://sos.ga.gov/admin/files/GA_VR_APP_2019.pdf.

[12]The 95% confidence interval is a measure of uncertainty in the estimates from the model. For example, the model might estimate that 94% of the members of a group voted for a particular candidate, with a 95% confidence interval of 91-96%. This means that based on the data and the model assumptions, 95% of the simulated estimates for this group fall in the range of 91-96%, with 94% being the average value. Larger confidence intervals reflect a higher degree of uncertainty in the estimates, while smaller confidence intervals reflect less uncertainty.

racially polarized voting is found when Black voters and White voters support different candidates.

15. Figure 2 presents the estimates of support for the Black-preferred candidate for Black and White voters for all 40 electoral contests from 2012 to 2022. Here, I present only the estimates and confidence intervals, and exclude individual election labels. Full results for each election are presented in Figure 3 and Table 1. In each panel, the solid dots correspond to an estimate in a particular election, and the gray vertical lines behind each dot are the 95% confidence intervals for the estimate.[13]
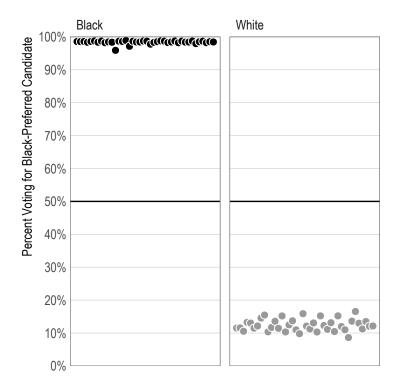

Figure 2: Racially Polarized Voting Estimates by Race — Focus Area

16. Examining Figure 2, the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. On average, Black voters supported their candidates of choice with 98.4% of the vote.

17. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every election. On average, White voters supported Black-preferred candidates with 12.4% of the vote, and in no election did this estimate exceed 17%.

18. Figure 3 presents the same results as Figure 2, separated by each electoral contest. The estimated levels of support for the Black-preferred candidate in each election for each

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[13]In some cases the lines for the confidence intervals are not visible behind the dots because they are relatively small.

Figure 3: Racially Polarized Voting Estimates by Election — Focus Area

group are represented by the colored points, and the horizontal lines indicate the range of the 95% confidence intervals. In every election, Black voters have a clear candidate of choice, and White voters are strongly opposed to this candidate.

19. There is also strong evidence of racially polarized voting in each of the five congressional districts that comprise the focus area. Figure 4 plots the results, and Tables 2–6 present the full results. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections in each district. On average, Black voters supported their candidates of choice with 97.2% of the vote in CD 3, 93.3% in CD 6, 96.1% in CD 11, 99.0% in CD 13, and 95.8% in CD 14.

20. In contrast to Black voters, Figure 4 shows that White voters are highly cohesive in voting in opposition to the Black-preferred candidate in every election in each district. On average, White voters supported Black-preferred candidates with 6.7% of the vote in CD 3, 20.2% in CD 6, 16.1% in CD 11, 15.5% in CD 13, and 10.3% in CD 14.
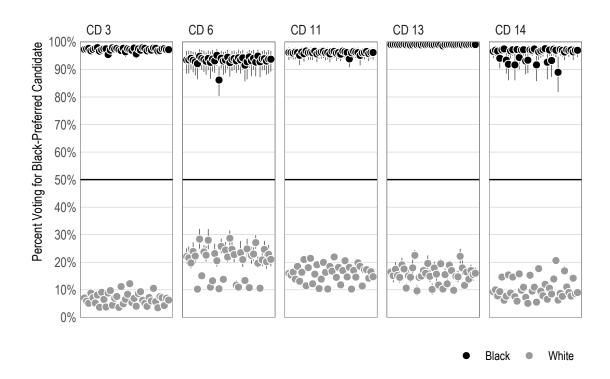

Figure 4: Racially Polarized Voting Estimates by Race — Congressional Districts

Performance of Black-Preferred Candidates in the Focus Area

21. Having identified the Black-preferred candidate in each election, I now turn to their ability to win elections in these districts. Table 7 presents the results of each election in the focus area and each congressional district. For each election, I present the vote share obtained by the Black-preferred candidate.[14]

22. The White-preferred candidate won the majority of the vote in all 40 elections in the focus area. In the 3rd, 6th, 11th, and 14th Congressional Districts, the White-preferred candidate received a larger share of the vote than the Black-preferred candidate in all 40 elections. In the 13th Congressional District, the Black-preferred candidate won a larger share of the vote in all 40 elections.

Performance of the the Sixth Congressional District in the Illustrative Map

23. I also analyzed the performance of Black-preferred candidates in the new 6th Congressional District proposed in the plaintiffs' illustrative map by calculating the percentage of the vote won by the Black-preferred candidates across the 31 statewide races from 2012 through 2021.

24. To perform this analysis, I used geographic data on the boundaries of the voting precincts in each year and the boundaries of the districts in the illustrative maps to determine which voting precincts would be located in each district. Then, I aggregated the election results for each contest for all of the precincts in each district to find the estimated vote shares of candidates in each contest. I was not able to include the 2022 elections in this analysis because, as of December 12, 2022, precinct boundary data for the 2022 voting precincts was not available.

25. Figure 5 presents the results of this analysis. In the plaintiffs' illustrative 6th Congressional District, the Black-preferred candidate won a larger share of the vote in all 31 statewide elections, with an average of 66.1%. Table 8 provide the full results.

26. Under the plaintiffs' illustrative map, the 13th Congressional District (the only district in the focus area to which the Black-preferred candidate won a majority of the vote in every election) continues to perform for Black-preferred candidates. I estimate that under this map Black-preferred candidates won a larger share of the vote in all 40 statewide elections, with an average of 62.3%.

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[14]Winning elections in Georgia requires a majority of the vote rather than a plurality of the vote (the threshold in most of the states). In this table and following sections analyzing election results I present vote shares as percentages of the two-party vote (excluding third party and independent candidates).
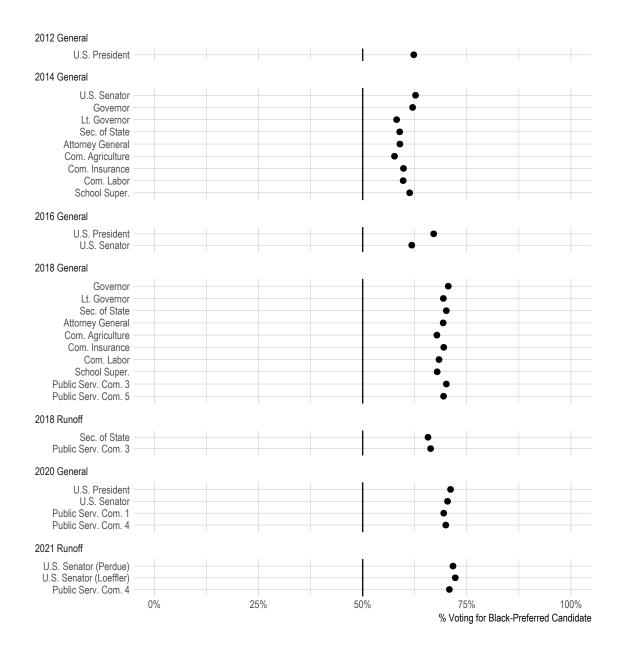
Figure 5: Vote Shares of Black-Preferred Candidates in CD 6 Under the Illustrative Map

Table 1: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — Focus Area

		Black	White	Other
2012 General	U.S. President*	97.1% (96.6, 97.6)	12.3% (12.0, 12.5)	94.7% (92.9, 96.2)
2014 General	U.S. Senator	98.8% (98.4, 99.1)	13.7% (13.4, 14.0)	94.0% (91.4, 96.0)
	Governor	98.7% (98.3, 99.0)	15.2% (14.8, 15.6)	83.8% (80.2, 87.3)
	Lt. Governor*	98.2% (97.8, 98.6)	11.0% (10.5, 11.5)	70.0% (65.7, 73.8)
	Sec. of State*	98.5% (98.1, 98.8)	11.2% (10.8, 11.6)	75.1% (71.7, 78.7)
	Attorney General	98.4% (98.0, 98.7)	11.4% (11.0, 11.9)	79.2% (75.3, 83.0)
	Com. Agriculture	97.8% (97.2, 98.3)	11.1% (10.6, 11.6)	66.9% (62.7, 71.4)
	Com. Insurance*	98.4% (98.0, 98.8)	11.2% (10.8, 11.7)	79.2% (75.1, 83.0)
	Com. Labor*	98.6% (98.2, 98.9)	11.5% (11.0, 11.9)	78.7% (75.3, 82.5)
	School Super.*	98.7% (98.3, 99.0)	13.0% (12.6, 13.5)	86.9% (83.3, 90.1)
2016 General	U.S. President	98.7% (98.4, 99.0)	12.1% (11.8, 12.4)	94.7% (93.3, 95.8)
	U.S. Senator	95.9% (95.0, 96.7)	8.6% (8.1, 9.2)	85.6% (82.0, 89.3)
2018 General	Governor*	98.9% (98.6, 99.1)	13.2% (13.0, 13.5)	93.5% (92.2, 94.6)
	Lt. Governor	98.5% (98.2, 98.8)	13.0% (12.7, 13.3)	91.2% (89.6, 92.5)
	Sec. of State	98.7% (98.4, 99.0)	13.5% (13.2, 13.8)	92.2% (90.7, 93.6)
	Attorney General	98.6% (98.2, 98.9)	13.6% (13.1, 14.1)	90.0% (87.6, 92.2)
	Com. Agriculture	98.2% (97.7, 98.7)	11.5% (11.1, 11.9)	87.6% (85.3, 89.8)
	Com. Insurance*	98.7% (98.3, 98.9)	12.1% (11.8, 12.5)	91.7% (90.1, 93.1)
	Com. Labor	98.4% (97.9, 98.7)	11.7% (11.3, 12.2)	89.2% (86.7, 91.2)
	School Super.*	98.4% (98.0, 98.7)	11.0% (10.6, 11.4)	88.1% (86.0, 90.0)
	Public Serv. Com. 3	98.7% (98.4, 99.0)	13.1% (12.8, 13.5)	92.2% (90.6, 93.5)
	Public Serv. Com. 5	98.7% (98.4, 99.0)	12.5% (12.2, 12.9)	90.5% (88.7, 92.0)
2018 Runoff	Sec. of State	98.6% (98.2, 98.9)	15.2% (14.9, 15.6)	90.0% (87.8, 91.8)
	Public Serv. Com. 3	98.6% (98.2, 98.9)	16.5% (16.2, 16.9)	90.2% (87.8, 92.2)
2020 General	U.S. President	98.0% (97.4, 98.4)	15.5% (15.0, 16.0)	90.4% (88.0, 92.3)
	U.S. Senator	98.2% (97.8, 98.7)	13.6% (13.2, 14.1)	90.8% (88.7, 92.7)
	Public Serv. Com. 1*	98.3% (97.9, 98.7)	11.6% (11.2, 12.0)	90.0% (88.1, 91.7)
	Public Serv. Com. 4*	98.4% (98.0, 98.7)	12.0% (11.6, 12.4)	91.6% (89.6, 93.1)
2021 Runoff	U.S. Senator (Perdue)	98.7% (98.4, 99.0)	14.5% (14.3, 14.9)	94.4% (93.1, 95.5)
	U.S. Senator (Loeffler)*	98.7% (98.4, 99.0)	15.2% (14.9, 15.5)	95.1% (93.9, 96.1)
	Public Serv. Com. 4*	98.7% (98.4, 99.0)	13.1% (12.8, 13.4)	93.4% (91.9, 94.5)
2022 General	U.S. Senator*	98.7% (98.4, 99.0)	15.9% (15.6, 16.2)	95.7% (94.5, 96.6)
	Governor*	98.5% (98.2, 98.9)	10.3% (9.9, 10.8)	88.1% (86.2, 89.9)
	Lt. Governor	98.4% (98.0, 98.8)	12.1% (11.8, 12.6)	91.4% (89.6, 93.0)
	Sec. of State	98.3% (97.8, 98.6)	10.5% (10.0, 11.1)	81.6% (79.2, 84.2)
	Attorney General	98.6% (98.2, 98.9)	12.1% (11.7, 12.5)	89.7% (87.8, 91.4)
	Com. Agriculture*	98.5% (98.2, 98.9)	9.8% (9.4, 10.2)	88.7% (87.1, 90.3)
	Com. Insurance*	98.4% (98.0, 98.8)	10.3% (9.9, 10.8)	87.4% (85.4, 89.2)
	Com. Labor*	98.5% (98.1, 98.8)	10.4% (10.0, 10.8)	90.9% (89.2, 92.3)
	School Super.*	98.4% (98.0, 98.8)	10.4% (10.0, 10.9)	87.4% (85.5, 89.1)

* Indicates that the Black candidate of choice was Black.

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Table 2: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 3

		Black	White	Other
2012 General	U.S. President*	95.4% (93.7, 96.7)	8.8% (8.2, 9.7)	92.2% (85.7, 95.9)
2014 General	U.S. Senator	97.2% (95.7, 98.3)	11.2% (10.4, 12.2)	88.1% (77.5, 94.8)
	Governor	96.8% (95.3, 98.0)	12.2% (11.3, 13.4)	83.1% (70.1, 92.5)
	Lt. Governor*	96.8% (95.3, 97.9)	6.3% (5.5, 7.2)	84.8% (74.0, 92.2)
	Sec. of State*	97.1% (95.7, 98.2)	6.9% (6.2, 8.0)	86.3% (74.2, 93.2)
	Attorney General	96.6% (95.2, 97.8)	8.1% (7.5, 9.1)	87.9% (77.1, 93.7)
	Com. Agriculture	96.4% (94.5, 97.7)	6.6% (5.7, 7.7)	80.6% (67.1, 90.9)
	Com. Insurance*	97.0% (95.6, 98.1)	7.2% (6.5, 8.1)	86.7% (77.1, 93.6)
	Com. Labor*	97.0% (95.5, 98.1)	7.5% (6.7, 8.5)	85.9% (74.6, 93.8)
	School Super.*	97.3% (96.0, 98.3)	9.7% (8.9, 10.7)	84.6% (74.4, 92.2)
2016 General	U.S. President	97.7% (96.4, 98.6)	7.0% (6.6, 7.5)	94.5% (91.1, 96.9)
	U.S. Senator	95.6% (93.8, 97.1)	4.0% (3.5, 4.8)	92.0% (87.6, 95.1)
2018 General	Governor*	97.8% (96.7, 98.6)	6.5% (6.1, 7.0)	95.3% (92.2, 97.3)
	Lt. Governor	97.4% (96.3, 98.3)	6.2% (5.7, 6.8)	94.5% (90.8, 97.1)
	Sec. of State	97.5% (96.3, 98.4)	7.2% (6.7, 7.8)	94.8% (91.6, 97.1)
	Attorney General	97.6% (96.4, 98.5)	7.6% (7.1, 8.2)	93.6% (89.6, 96.3)
	Com. Agriculture	97.2% (96.0, 98.1)	4.9% (4.4, 5.5)	93.7% (90.3, 96.2)
	Com. Insurance*	97.5% (96.3, 98.4)	5.7% (5.2, 6.2)	94.9% (91.8, 97.0)
	Com. Labor	97.6% (96.5, 98.5)	5.1% (4.7, 5.7)	94.4% (90.8, 97.0)
	School Super.*	97.5% (96.3, 98.3)	4.4% (4.0, 4.9)	94.8% (91.9, 96.9)
	Public Serv. Com. 3	97.6% (96.5, 98.5)	6.9% (6.4, 7.5)	94.0% (90.8, 96.7)
	Public Serv. Com. 5	97.7% (96.5, 98.5)	5.9% (5.5, 6.5)	94.5% (91.1, 96.8)
2018 Runoff	Sec. of State	96.7% (95.0, 97.9)	8.8% (8.2, 9.4)	93.0% (89.0, 96.1)
	Public Serv. Com. 3	96.8% (95.2, 98.0)	10.5% (9.9, 11.4)	90.0% (82.2, 94.8)
2020 General	U.S. President	97.4% (96.2, 98.4)	8.4% (7.9, 9.0)	94.9% (91.4, 97.2)
	U.S. Senator	97.5% (96.1, 98.4)	6.9% (6.5, 7.4)	96.3% (94.0, 97.9)
	Public Serv. Com. 1*	97.9% (96.9, 98.7)	5.1% (4.7, 5.6)	95.6% (92.8, 97.4)
	Public Serv. Com. 4*	97.7% (96.5, 98.6)	5.9% (5.4, 6.4)	95.6% (93.1, 97.4)
2021 Runoff	U.S. Senator (Perdue)	97.8% (96.5, 98.6)	8.6% (8.2, 9.2)	95.4% (92.5, 97.4)
	U.S. Senator (Loeffler)*	97.5% (96.2, 98.5)	9.3% (8.8, 10.0)	95.2% (92.0, 97.2)
	Public Serv. Com. 4*	97.9% (96.8, 98.7)	7.1% (6.7, 7.6)	95.3% (92.5, 97.2)
2022 General	U.S. Senator*	97.6% (96.3, 98.6)	9.1% (8.6, 9.7)	94.8% (91.6, 97.0)
	Governor*	97.2% (95.8, 98.2)	4.0% (3.5, 4.6)	92.2% (88.9, 94.6)
	Lt. Governor	97.0% (95.5, 98.1)	5.4% (4.9, 6.0)	94.0% (91.2, 96.2)
	Sec. of State	96.9% (95.3, 98.0)	3.5% (3.0, 4.0)	91.8% (88.6, 94.2)
	Attorney General	97.3% (95.9, 98.3)	5.2% (4.7, 5.8)	94.0% (90.7, 96.3)
	Com. Agriculture*	97.0% (95.7, 98.0)	3.6% (3.0, 4.3)	90.8% (86.8, 94.1)
	Com. Insurance*	97.8% (96.7, 98.6)	3.7% (3.3, 4.3)	92.2% (88.8, 94.8)
	Com. Labor*	97.2% (95.8, 98.2)	4.3% (3.8, 4.9)	92.3% (89.0, 94.9)
	School Super.*	97.2% (96.0, 98.2)	3.6% (3.2, 4.1)	93.0% (90.2, 95.4)

* Indicates that the Black candidate of choice was Black.

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Table 3: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 6

		Black	White	Other
2012 General	U.S. President*	86.2% (80.4, 91.1)	13.4% (12.6, 14.4)	90.4% (83.0, 95.1)
2014 General	U.S. Senator	93.8% (89.7, 96.7)	15.1% (14.2, 16.5)	87.6% (77.7, 94.0)
	Governor	94.0% (90.1, 96.7)	13.8% (12.9, 15.0)	90.3% (82.5, 95.7)
	Lt. Governor*	93.4% (88.7, 96.5)	10.3% (9.2, 11.5)	82.8% (74.5, 89.8)
	Sec. of State*	94.0% (89.7, 96.9)	10.8% (9.7, 12.1)	83.1% (73.5, 91.0)
	Attorney General	94.5% (90.6, 97.0)	10.6% (9.7, 11.8)	86.2% (77.9, 92.2)
	Com. Agriculture	92.8% (87.2, 96.3)	10.4% (9.3, 11.8)	79.6% (70.1, 87.2)
	Com. Insurance*	95.1% (91.3, 97.4)	11.0% (10.0, 12.3)	84.2% (75.0, 90.9)
	Com. Labor*	94.9% (91.4, 97.2)	11.0% (9.8, 12.6)	84.0% (72.0, 92.3)
	School Super.*	94.0% (89.9, 97.1)	13.3% (12.3, 14.7)	86.1% (75.8, 93.0)
2016 General	U.S. President	94.0% (89.8, 97.0)	19.7% (17.9, 22.1)	80.9% (70.5, 88.2)
	U.S. Senator	93.8% (88.4, 97.0)	11.7% (10.3, 13.4)	75.7% (68.5, 81.2)
2018 General	Governor*	94.4% (90.3, 97.2)	24.7% (21.6, 27.7)	67.0% (56.1, 77.8)
	Lt. Governor	92.5% (87.4, 95.9)	23.9% (20.9, 27.2)	64.8% (53.2, 75.4)
	Sec. of State	93.4% (88.4, 96.7)	23.7% (21.4, 26.2)	67.6% (59.6, 75.9)
	Attorney General	93.9% (89.7, 96.9)	21.9% (20.0, 24.3)	71.6% (63.0, 78.3)
	Com. Agriculture	93.8% (89.2, 97.0)	20.6% (18.4, 23.0)	66.6% (58.0, 74.3)
	Com. Insurance*	93.5% (88.5, 96.6)	22.8% (20.0, 25.7)	65.2% (54.5, 74.9)
	Com. Labor	94.2% (89.7, 97.1)	20.9% (18.5, 23.6)	66.9% (57.3, 75.1)
	School Super.*	94.1% (90.3, 96.8)	19.8% (17.8, 22.2)	66.0% (57.5, 72.7)
	Public Serv. Com. 3	93.7% (89.2, 96.7)	23.0% (20.6, 25.4)	68.7% (60.4, 77.3)
	Public Serv. Com. 5	94.2% (89.9, 97.1)	23.2% (20.3, 26.7)	63.8% (51.3, 73.6)
2018 Runoff	Sec. of State	92.1% (86.4, 95.9)	27.1% (24.9, 29.8)	56.6% (43.9, 67.2)
	Public Serv. Com. 3	91.5% (85.7, 95.5)	28.7% (26.1, 31.6)	55.8% (42.3, 68.0)
2020 General	U.S. President	94.8% (90.5, 97.3)	28.0% (24.7, 32.1)	69.7% (57.1, 79.9)
	U.S. Senator	93.0% (88.0, 96.4)	24.4% (21.8, 27.3)	70.9% (62.0, 78.8)
	Public Serv. Com. 1*	92.5% (86.6, 96.5)	22.1% (19.4, 25.0)	69.1% (59.9, 77.2)
	Public Serv. Com. 4*	93.1% (87.5, 96.7)	22.9% (19.8, 26.3)	68.5% (58.0, 77.7)
2021 Runoff	U.S. Senator (Perdue)	93.6% (89.1, 96.8)	24.7% (21.9, 27.8)	73.9% (64.1, 82.6)
	U.S. Senator (Loeffler)*	93.0% (88.1, 96.3)	25.8% (23.3, 28.6)	74.4% (65.0, 82.3)
	Public Serv. Com. 4*	92.8% (87.8, 96.3)	22.6% (20.2, 25.9)	73.2% (62.9, 80.5)
2022 General	U.S. Senator*	92.8% (86.4, 96.5)	28.4% (24.9, 32.1)	73.3% (61.2, 84.4)
	Governor*	94.0% (89.8, 96.9)	22.3% (19.5, 25.2)	62.5% (53.0, 71.4)
	Lt. Governor	92.7% (87.5, 95.9)	24.8% (21.9, 28.5)	65.3% (53.3, 75.1)
	Sec. of State	93.7% (89.4, 96.7)	20.2% (17.6, 23.0)	62.3% (53.5, 70.8)
	Attorney General	93.3% (89.0, 96.3)	23.5% (20.6, 27.7)	67.2% (54.2, 76.3)
	Com. Agriculture*	93.5% (88.6, 96.8)	21.0% (18.3, 24.3)	64.4% (53.7, 72.7)
	Com. Insurance*	93.1% (88.8, 96.2)	21.0% (18.5, 23.9)	64.0% (54.7, 72.0)
	Com. Labor*	93.1% (88.7, 96.3)	22.5% (19.5, 25.5)	63.4% (53.4, 72.9)
	School Super.*	93.0% (88.1, 96.2)	21.6% (18.6, 25.7)	63.0% (49.8, 72.6)

* Indicates that the Black candidate of choice was Black.

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Table 4: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 11

		Black	White	Other
2012 General	U.S. President*	93.8% (90.8, 95.9)	14.6% (13.9, 15.5)	91.1% (84.6, 95.5)
2014 General	U.S. Senator	95.5% (93.0, 97.3)	16.4% (15.7, 17.4)	89.1% (80.0, 94.7)
	Governor	96.1% (93.7, 97.8)	16.3% (15.6, 17.3)	89.7% (80.2, 95.7)
	Lt. Governor*	96.1% (93.8, 97.8)	10.5% (9.9, 11.3)	90.2% (83.7, 94.9)
	Sec. of State*	96.0% (93.6, 97.8)	11.4% (10.8, 12.1)	91.3% (84.7, 95.9)
	Attorney General	96.5% (94.4, 98.1)	11.4% (10.9, 12.3)	91.5% (83.3, 95.8)
	Com. Agriculture	96.3% (93.8, 98.0)	10.3% (9.6, 11.0)	91.8% (85.6, 95.9)
	Com. Insurance*	96.7% (94.6, 98.1)	11.8% (11.2, 12.6)	90.7% (83.3, 95.7)
	Com. Labor*	96.2% (93.7, 97.8)	12.2% (11.6, 13.0)	90.2% (82.6, 95.3)
	School Super.*	96.1% (93.9, 97.8)	14.7% (14.0, 15.7)	90.3% (80.0, 95.6)
2016 General	U.S. President	96.2% (93.5, 98.0)	16.8% (16.1, 17.7)	93.3% (88.6, 96.5)
	U.S. Senator	96.7% (94.5, 98.3)	10.3% (9.7, 11.0)	94.7% (90.8, 97.3)
2018 General	Governor*	96.0% (93.3, 97.9)	19.1% (18.3, 20.2)	93.2% (86.9, 96.7)
	Lt. Governor	96.0% (93.5, 97.9)	18.1% (17.4, 19.1)	93.7% (88.5, 97.0)
	Sec. of State	96.5% (94.3, 98.2)	18.5% (17.8, 19.4)	93.8% (89.0, 97.0)
	Attorney General	96.6% (94.6, 98.1)	18.1% (17.4, 18.9)	94.1% (89.5, 97.0)
	Com. Agriculture	96.2% (93.7, 97.9)	15.7% (14.9, 16.7)	93.4% (88.2, 96.7)
	Com. Insurance*	96.5% (94.4, 98.2)	17.3% (16.5, 18.3)	92.2% (86.9, 96.1)
	Com. Labor	96.1% (93.7, 97.9)	16.4% (15.5, 17.6)	92.5% (86.1, 96.3)
	School Super.*	96.3% (94.0, 98.1)	15.4% (14.6, 16.4)	92.7% (86.7, 96.3)
	Public Serv. Com. 3	96.5% (94.0, 98.1)	18.5% (17.8, 19.7)	92.2% (85.7, 95.9)
	Public Serv. Com. 5	96.1% (93.9, 97.9)	17.3% (16.6, 18.3)	93.3% (88.3, 96.5)
2018 Runoff	Sec. of State	95.1% (91.5, 97.4)	19.8% (18.9, 20.9)	89.7% (81.4, 95.1)
	Public Serv. Com. 3	95.1% (91.6, 97.5)	21.4% (20.5, 22.7)	87.9% (78.5, 94.0)
2020 General	U.S. President	96.1% (93.7, 97.9)	20.6% (19.7, 21.9)	93.2% (87.7, 96.5)
	U.S. Senator	96.4% (94.0, 98.1)	18.5% (17.7, 19.6)	93.4% (88.8, 96.4)
	Public Serv. Com. 1*	96.2% (93.7, 97.9)	15.9% (15.2, 16.9)	94.6% (91.0, 97.0)
	Public Serv. Com. 4*	95.7% (93.0, 97.6)	17.0% (16.2, 18.0)	93.6% (89.8, 96.5)
2021 Runoff	U.S. Senator (Perdue)	96.1% (93.6, 97.8)	19.9% (19.2, 20.9)	94.5% (90.1, 97.3)
	U.S. Senator (Loeffler)*	96.2% (93.4, 98.0)	21.0% (20.2, 22.1)	94.2% (90.3, 97.0)
	Public Serv. Com. 4*	96.2% (94.1, 97.9)	18.1% (17.5, 19.0)	94.9% (91.5, 97.2)
2022 General	U.S. Senator*	95.6% (92.6, 97.5)	21.9% (21.0, 23.3)	92.4% (86.3, 96.3)
	Governor*	95.9% (93.1, 97.9)	14.5% (13.6, 15.7)	91.6% (86.7, 95.1)
	Lt. Governor	95.6% (92.6, 97.6)	17.0% (16.1, 18.2)	92.5% (87.3, 96.0)
	Sec. of State	96.1% (94.0, 97.7)	13.1% (12.4, 14.0)	93.5% (89.8, 96.3)
	Attorney General	96.0% (93.4, 97.7)	16.6% (15.8, 17.6)	93.0% (88.2, 96.1)
	Com. Agriculture*	96.1% (93.5, 97.9)	13.9% (13.0, 15.1)	91.9% (86.7, 95.3)
	Com. Insurance*	96.6% (94.2, 98.2)	13.9% (13.0, 15.1)	92.5% (87.0, 96.0)
	Com. Labor*	95.9% (93.6, 97.8)	14.7% (13.9, 15.8)	93.3% (89.0, 96.3)
	School Super.*	95.7% (92.8, 97.6)	14.2% (13.4, 15.3)	93.3% (89.3, 96.1)

* Indicates that the Black candidate of choice was Black.

Table 5: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 13

		Black	White	Other
2012 General	U.S. President*	99.2% (98.8, 99.4)	11.8% (10.8, 12.9)	96.7% (95.0, 98.0)
2014 General	U.S. Senator	99.2% (98.8, 99.4)	14.5% (13.3, 15.9)	94.8% (91.3, 96.8)
	Governor	99.1% (98.7, 99.4)	15.0% (13.3, 16.7)	84.7% (79.9, 89.2)
	Lt. Governor*	98.9% (98.5, 99.3)	9.6% (7.9, 11.6)	68.4% (62.5, 74.0)
	Sec. of State*	98.9% (98.5, 99.3)	9.8% (8.3, 11.5)	76.5% (71.4, 81.6)
	Attorney General	98.9% (98.5, 99.3)	12.2% (10.4, 14.0)	76.8% (71.5, 82.2)
	Com. Agriculture	98.9% (98.4, 99.3)	10.2% (8.3, 12.3)	61.0% (55.0, 66.8)
	Com. Insurance*	98.9% (98.5, 99.2)	10.6% (9.0, 12.3)	79.2% (74.1, 84.4)
	Com. Labor*	99.0% (98.6, 99.3)	10.3% (8.7, 11.9)	81.3% (76.7, 85.9)
	School Super.*	99.1% (98.7, 99.4)	11.6% (10.2, 13.2)	90.3% (85.9, 94.0)
2016 General	U.S. President	99.1% (98.7, 99.4)	15.2% (13.5, 17.1)	93.2% (89.6, 96.3)
	U.S. Senator	98.6% (98.0, 99.0)	15.1% (12.7, 17.7)	64.2% (58.6, 70.2)
2018 General	Governor*	99.1% (98.8, 99.4)	16.5% (15.2, 17.9)	96.2% (94.3, 97.6)
	Lt. Governor	99.1% (98.8, 99.5)	16.0% (14.2, 18.0)	91.2% (87.8, 94.2)
	Sec. of State	99.1% (98.7, 99.4)	16.5% (14.9, 18.3)	94.1% (91.1, 96.3)
	Attorney General	99.0% (98.5, 99.3)	17.0% (15.0, 19.1)	88.8% (85.0, 92.5)
	Com. Agriculture	99.0% (98.7, 99.3)	14.7% (12.7, 17.0)	83.8% (80.2, 87.2)
	Com. Insurance*	99.1% (98.7, 99.4)	14.9% (13.1, 16.9)	93.8% (91.0, 96.3)
	Com. Labor	99.1% (98.7, 99.4)	14.6% (12.7, 16.7)	87.2% (83.6, 90.4)
	School Super.*	99.1% (98.7, 99.4)	13.9% (12.1, 15.9)	86.0% (82.6, 89.2)
	Public Serv. Com. 3	99.1% (98.7, 99.4)	17.0% (15.4, 18.8)	93.3% (90.6, 96.0)
	Public Serv. Com. 5	99.1% (98.7, 99.4)	16.0% (14.2, 18.0)	91.4% (88.3, 94.2)
2018 Runoff	Sec. of State	99.0% (98.6, 99.3)	17.0% (15.6, 18.5)	95.1% (92.5, 97.1)
	Public Serv. Com. 3	99.0% (98.5, 99.3)	19.0% (17.5, 20.7)	94.7% (91.8, 96.9)
2020 General	U.S. President	98.9% (98.5, 99.3)	22.2% (19.6, 24.9)	80.6% (77.1, 84.1)
	U.S. Senator	98.9% (98.5, 99.3)	19.1% (16.7, 21.6)	85.3% (82.0, 88.4)
	Public Serv. Com. 1*	99.0% (98.6, 99.3)	17.5% (15.0, 20.1)	84.6% (81.1, 87.9)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	17.9% (15.6, 20.2)	86.7% (83.8, 89.6)
2021 Runoff	U.S. Senator (Perdue)	99.0% (98.7, 99.3)	17.5% (16.2, 19.2)	95.8% (94.1, 97.2)
	U.S. Senator (Loeffler)*	99.1% (98.7, 99.4)	19.4% (17.9, 21.2)	95.0% (92.9, 96.8)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	15.5% (14.0, 17.7)	95.2% (92.3, 97.0)
2022 General	U.S. Senator*	99.0% (98.6, 99.3)	22.5% (20.8, 24.4)	95.1% (92.8, 97.0)
	Governor*	99.0% (98.6, 99.3)	14.9% (12.8, 17.3)	86.9% (84.0, 89.7)
	Lt. Governor	98.8% (98.4, 99.2)	17.9% (15.6, 20.7)	90.0% (86.5, 93.2)
	Sec. of State	98.9% (98.5, 99.3)	19.6% (16.8, 22.5)	71.5% (68.0, 75.1)
	Attorney General	98.9% (98.5, 99.2)	18.0% (15.6, 20.9)	87.4% (83.8, 90.6)
	Com. Agriculture*	99.0% (98.5, 99.3)	14.5% (12.6, 16.8)	88.4% (85.7, 91.1)
	Com. Insurance*	99.0% (98.6, 99.3)	15.6% (13.2, 18.2)	84.8% (81.5, 87.9)
	Com. Labor*	98.9% (98.5, 99.2)	15.0% (13.1, 17.4)	91.0% (88.0, 93.7)
	School Super.*	98.9% (98.5, 99.3)	15.7% (13.3, 18.4)	85.3% (81.9, 88.5)

* Indicates that the Black candidate of choice was Black.

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Table 6: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 14

		Black	White	Other
2012 General	U.S. President*	93.4% (88.5, 96.9)	15.8% (14.8, 17.1)	83.3% (69.3, 93.1)
2014 General	U.S. Senator	94.3% (90.0, 97.3)	16.9% (15.7, 18.7)	76.7% (52.3, 90.7)
	Governor	91.9% (86.1, 96.1)	20.6% (19.3, 22.3)	73.2% (48.1, 88.2)
	Lt. Governor*	89.0% (81.8, 94.7)	14.2% (13.1, 15.6)	77.9% (59.0, 92.4)
	Sec. of State*	93.4% (88.6, 96.8)	14.6% (13.4, 16.1)	71.7% (51.4, 87.4)
	Attorney General	91.7% (86.1, 96.0)	15.4% (14.1, 17.0)	70.8% (49.4, 88.3)
	Com. Agriculture	91.7% (85.7, 96.0)	13.9% (12.7, 15.4)	71.3% (48.9, 87.7)
	Com. Insurance*	93.1% (88.3, 96.7)	14.6% (13.6, 15.8)	76.6% (61.9, 89.4)
	Com. Labor*	92.6% (86.4, 96.3)	15.3% (14.1, 16.7)	74.2% (54.5, 89.5)
	School Super.*	93.2% (87.3, 96.9)	17.7% (16.5, 19.2)	72.2% (52.0, 88.3)
2016 General	U.S. President	96.4% (93.5, 98.3)	8.6% (8.0, 9.4)	92.8% (87.4, 96.2)
	U.S. Senator	94.0% (90.4, 97.0)	7.6% (6.9, 8.5)	89.3% (82.4, 94.0)
2018 General	Governor*	97.4% (95.1, 98.8)	9.0% (8.5, 9.7)	94.1% (89.9, 97.0)
	Lt. Governor	96.6% (94.2, 98.3)	9.3% (8.7, 10.0)	93.8% (89.4, 96.8)
	Sec. of State	96.7% (93.8, 98.6)	10.0% (9.4, 10.9)	94.1% (88.5, 97.1)
	Attorney General	96.7% (94.2, 98.5)	9.9% (9.3, 10.5)	93.8% (90.0, 96.5)
	Com. Agriculture	97.2% (95.0, 98.6)	7.7% (7.2, 8.4)	95.1% (91.7, 97.3)
	Com. Insurance*	96.9% (94.4, 98.6)	8.8% (8.3, 9.6)	95.0% (91.0, 97.5)
	Com. Labor	96.6% (94.1, 98.3)	8.5% (7.9, 9.2)	94.9% (90.9, 97.4)
	School Super.*	97.1% (94.7, 98.7)	7.8% (7.3, 8.5)	94.1% (89.7, 96.9)
	Public Serv. Com. 3	97.0% (94.4, 98.6)	9.5% (8.9, 10.3)	93.6% (88.7, 96.8)
	Public Serv. Com. 5	97.1% (94.9, 98.7)	9.0% (8.5, 9.8)	93.9% (89.4, 96.9)
2018 Runoff	Sec. of State	96.4% (93.4, 98.3)	10.9% (10.1, 11.9)	88.0% (79.4, 94.4)
	Public Serv. Com. 3	96.3% (93.4, 98.3)	12.0% (11.2, 13.2)	88.5% (76.3, 95.4)
2020 General	U.S. President	96.9% (94.6, 98.4)	9.3% (8.8, 10.0)	94.3% (91.0, 96.6)
	U.S. Senator	97.0% (95.0, 98.5)	8.7% (8.2, 9.3)	95.1% (92.2, 97.1)
	Public Serv. Com. 1*	97.0% (94.9, 98.5)	7.3% (6.7, 7.9)	94.2% (90.9, 96.5)
	Public Serv. Com. 4*	97.4% (95.7, 98.7)	7.8% (7.3, 8.4)	94.9% (92.0, 97.0)
2021 Runoff	U.S. Senator (Perdue)	96.9% (94.7, 98.5)	10.6% (10.0, 11.3)	95.0% (91.5, 97.3)
	U.S. Senator (Loeffler)*	97.0% (95.0, 98.4)	10.9% (10.4, 11.7)	94.1% (90.2, 96.7)
	Public Serv. Com. 4*	97.0% (95.1, 98.5)	9.5% (9.0, 10.1)	94.8% (91.5, 97.2)
2022 General	U.S. Senator*	97.2% (95.0, 98.6)	11.0% (10.5, 11.7)	94.7% (91.1, 97.3)
	Governor*	97.5% (95.8, 98.7)	5.5% (5.1, 6.1)	95.0% (92.1, 97.2)
	Lt. Governor	97.1% (95.0, 98.5)	7.7% (7.2, 8.3)	94.5% (91.0, 96.9)
	Sec. of State	97.1% (95.2, 98.5)	5.1% (4.6, 5.6)	95.1% (92.2, 97.2)
	Attorney General	97.1% (95.0, 98.6)	7.5% (7.0, 8.1)	95.3% (91.8, 97.6)
	Com. Agriculture*	97.0% (95.0, 98.4)	5.9% (5.4, 6.5)	94.7% (91.2, 97.1)
	Com. Insurance*	97.4% (95.6, 98.7)	6.3% (5.8, 6.8)	94.8% (91.7, 97.0)
	Com. Labor*	97.2% (95.2, 98.5)	6.6% (6.1, 7.1)	94.8% (91.7, 97.0)
	School Super.*	97.2% (95.1, 98.6)	6.2% (5.7, 6.8)	95.3% (92.5, 97.3)

* Indicates that the Black candidate of choice was Black.

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Table 7: Election Results in the Focus Area — Vote Share of Black-Preferred Candidates

		Focus Area	CD 3	CD 6	CD 11	CD 13	CD 14
2012 General	U.S. President	39.5%	32.2%	28.0%	32.7%	74.8%	29.8%
2014 General	U.S. Senator	40.2%	32.2%	28.6%	32.6%	75.8%	30.7%
	Governor	40.4%	32.6%	27.9%	32.7%	75.0%	33.1%
	Lt. Governor	36.1%	28.1%	24.1%	28.1%	71.8%	27.8%
	Sec. of State	36.8%	28.8%	24.6%	28.9%	72.6%	28.4%
	Attorney General	37.3%	29.7%	24.8%	29.0%	73.3%	28.7%
	Com. Agriculture	35.9%	28.0%	23.8%	28.1%	71.3%	27.5%
	Com. Insurance	37.3%	29.1%	25.0%	29.3%	73.3%	28.7%
	Com. Labor	37.4%	29.2%	24.9%	29.5%	73.3%	29.0%
	School Super.	39.1%	30.9%	27.0%	31.5%	74.6%	30.9%
2016 General	U.S. President	41.8%	31.6%	35.8%	36.7%	77.7%	27.8%
	U.S. Senator	37.7%	28.7%	28.9%	32.2%	73.7%	26.4%
2018 General	Governor	44.7%	32.8%	38.6%	40.0%	80.9%	30.1%
	Lt. Governor	43.9%	32.3%	37.4%	39.3%	79.9%	30.1%
	Sec. of State	44.6%	33.1%	37.9%	39.7%	80.5%	30.7%
	Attorney General	44.3%	33.3%	37.5%	39.5%	79.8%	30.6%
	Com. Agriculture	42.6%	31.3%	35.5%	37.6%	78.7%	29.2%
	Com. Insurance	43.7%	32.1%	36.7%	38.6%	80.2%	30.0%
	Com. Labor	43.0%	31.6%	35.8%	38.0%	79.2%	29.7%
	School Super.	42.4%	31.1%	34.8%	37.3%	78.9%	29.1%
	Public Serv. Com. 3	44.5%	32.9%	37.6%	39.6%	80.6%	30.3%
	Public Serv. Com. 5	43.9%	32.3%	36.8%	38.8%	80.2%	30.1%
2018 Runoff	Sec. of State	41.6%	30.4%	36.5%	35.8%	76.9%	28.3%
	Public Serv. Com. 3	42.6%	31.4%	37.5%	37.0%	77.4%	29.1%
2020 General	U.S. President	45.7%	34.7%	42.3%	42.3%	80.3%	31.2%
	U.S. Senator	44.7%	33.8%	39.9%	40.9%	80.4%	30.8%
	Public Serv. Com. 1	43.4%	32.6%	37.8%	39.2%	80.1%	29.6%
	Public Serv. Com. 4	44.0%	33.1%	38.3%	39.8%	80.5%	30.2%
2021 Runoff	U.S. Senator (Perdue)	46.1%	35.2%	40.5%	41.7%	82.2%	32.3%
	U.S. Senator (Loeffler)	46.6%	35.6%	41.3%	42.4%	82.5%	32.4%
	Public Serv. Com. 4	45.1%	34.1%	38.8%	40.5%	81.7%	31.5%
2022 General	U.S. Senator	46.6%	35.3%	42.7%	42.4%	83.4%	31.9%
	Governor	41.8%	31.3%	36.0%	37.0%	80.6%	27.8%
	Lt. Governor	43.4%	32.4%	38.4%	38.8%	81.5%	29.2%
	Sec. of State	41.0%	30.8%	34.5%	36.3%	79.1%	27.5%
	Attorney General	43.1%	32.4%	37.9%	38.6%	81.2%	29.2%
	Com. Agriculture	41.6%	30.8%	35.5%	36.5%	80.8%	27.9%
	Com. Insurance	41.6%	31.2%	35.4%	36.7%	80.3%	28.3%
	Com. Labor	42.2%	31.5%	36.3%	37.3%	81.2%	28.4%
	School Super.	41.7%	31.1%	35.6%	37.0%	80.4%	28.3%

Table 8: Vote Share of Black-Preferred Candidates — Illustrative Map

		CD 6
2012 General	U.S. President	62.3%
2014 General	U.S. Senator	62.7%
	Governor	62.0%
	Lt. Governor	58.2%
	Sec. of State	58.9%
	Attorney General	58.9%
	Com. Agriculture	57.6%
	Com. Insurance	59.8%
	Com. Labor	59.7%
	School Super.	61.3%
2016 General	U.S. President	67.0%
	U.S. Senator	61.8%
2018 General	Governor	70.6%
	Lt. Governor	69.4%
	Sec. of State	70.1%
	Attorney General	69.3%
	Com. Agriculture	67.8%
	Com. Insurance	69.5%
	Com. Labor	68.3%
	School Super.	67.9%
	Public Serv. Com. 3	70.1%
	Public Serv. Com. 5	69.4%
2018 Runoff	Sec. of State	65.7%
	Public Serv. Com. 3	66.3%
2020 General	U.S. President	71.1%
	U.S. Senator	70.4%
	Public Serv. Com. 1	69.5%
	Public Serv. Com. 4	70.0%
2021 Runoff	U.S. Senator (Perdue)	71.7%
	U.S. Senator (Loeffler)	72.2%
	Public Serv. Com. 4	70.8%

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Table 9: List of Candidates in Statewide Elections, 2012–2022

		Democratic Candidate	Dem. Cand. Race	Republican Candidate	Rep. Cand. Race
2012 General	U.S. President	Barack Obama	Black	Mitt Romney	White
2014 General	U.S. Senator	Michelle Nunn	White	David Perdue	White
	Governor	Jason Carter	White	John Nathan Deal	White
	Lt. Governor	Connie Stokes	Black	L. S. 'Casey' Cagle	White
	Sec. of State	Doreen Carter	Black	Brian Kemp	White
	Attorney General	Gregory Hecht	White	Samuel Olens	White
	Com. Agriculture	Christopher Irvin	White	Gary Black	White
	Com. Insurance	Elizabeth Johnson	Black	Ralph Hudgens	White
	Com. Labor	Robbin Shipp	Black	J. Mark Butler	White
	School Super.	Valarie Wilson	Black	Richard Woods	White
2016 General	U.S. President	Hillary Clinton	White	Donald Trump	White
	U.S. Senator	Jim Barksdale	White	Johnny Isakson	White
2018 General	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Sarah Riggs Amico	White	Geoff Duncan	White
	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Attorney General	Charlie Bailey	White	Chris Carr	White
	Com. Agriculture	Fred Swann	White	Gary Black	White
	Com. Insurance	Janice Laws	Black	Jim Beck	White
	Com. Labor	Richard Keatley	White	Mark Butler	White
	School Super.	Otha Thornton	Black	Richard Woods	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
	Public Serv. Com. 5	Dawn Randolph	White	Tricia Pridemore	White
2018 Runoff	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
2020 General	U.S. President	Joe Biden	White	Donald Trump	White
	U.S. Senator	Jon Ossoff	White	David Perdue	White
	Public Serv. Com. 1	Robert Bryant	Black	Jason Shaw	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2021 Runoff	U.S. Senator (Perdue)	Jon Ossoff	White	David Perdue	White
	U.S. Senator (Loeffler)	Raphael Warnock	Black	Kelly Loeffler	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2022 General	U.S. Senator	Raphael Warnock	Black	Herschel Junior Walker	Black
	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Charlie Bailey	White	Burt Jones	White
	Sec. of State	Bee Nguyen	Asian	Brad Raffensperger	White
	Attorney General	Jennifer "Jen" Jordan	White	Chris Carr	White
	Com. Agriculture	Nakita Hemingway	Black	Tyler Harper	White
	Com. Insurance	Janice Laws Robinson	Black	John King	White
	Com. Labor	William "Will" Boddie, Jr	Black	Bruce Thompson	White
	School Super.	Alisha Thomas Searcy	Black	Richard Woods	White

* Excludes candidates in the 2020 Special Election for U.S. Senate

Maxwell Palmer

CONTACT	Department of Political Science *E-mail:* mbpalmer@bu.edu Boston University *Website:* www.maxwellpalmer.com 232 Bay State Road *Phone:* (617) 358-2654 Boston, MA 02215

APPOINTMENTS   Boston University, Boston, Massachusetts

Associate Professor, Department of Political Science, 2021–Present

Director of Advanced Programs, Dept. of Political Science, 2020–Present

Civic Tech Fellow, Faculty of Computing & Data Sciences, 2021–Present

Faculty Fellow, Initiative on Cities, 2019–Present

Assistant Professor, Department of Political Science, 2014–2021

Junior Faculty Fellow, Hariri Institute for Computing, 2017–2020

EDUCATION   Harvard University, Cambridge, Massachusetts

Ph.D., Political Science, May 2014.

A.M., Political Science, May 2012.

Bowdoin College, Brunswick, Maine

A.B., Mathematics & Government and Legal Studies, May 2008.

BOOK   *Neighborhood Defenders: Participatory Politics and America's Housing Crisis* (with Katherine Levine Einstein and David M. Glick). 2019. New York, NY: Cambridge University Press.

– Selected chapters republished in *Political Science Quarterly*.

– Reviewed in *Perspectives on Politics*, *Political Science Quarterly*, *Economics 21*, *Public Books*, and *City Journal*.

– Covered in Vox's "The Weeds" podcast, CityLab, Slate's "Gabfest," Curbed, Brookings Institution Up Front.

REFEREED ARTICLES   Einstein, Katherine Levine, Joseph Ornstein, and Maxwell Palmer. 2022. "Who Represents the Renters?" *Housing Policy Debate*.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2022. "Developing a pro-housing movement? Public distrust of developers, fractured coalitions, and the challenges of measuring political power." *Interest Groups & Advocacy* 11:189–-208.

1

Einstein, Katherine Levine, David Glick, Luisa Godinez Puig, and Maxwell Palmer. 2022. "Still Muted: The Limited Participatory Democracy of Zoom Public Meetings." *Urban Affairs Review*.

Glick, David M. and Maxwell Palmer. 2022. "County Over Party: How Governors Prioritized Geography Not Particularism in the Distribution of Opportunity Zones." *British Journal of Political Science* 52(4): 1902–1910.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2021. "Driving Turnout: The Effect of Car Ownership on Electoral Participation." *Political Science Research and Methods*.

Einstein, Katherine Levine and Maxwell Palmer. 2021. "Land of the Freeholder: How Property Rights Make Voting Rights." *Journal of Historical Political Economy* 1(4): 499–530.

Godinez Puig, Luisa, Katharine Lusk, David Glick, Katherine L. Einstein, Maxwell Palmer, Stacy Fox, and Monica L. Wang. 2020. "Perceptions of Public Health Priorities and Accountability Among US Mayors." *Public Health Reports* (October 2020).

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2020. "Can Mayors Lead on Climate Change? Evidence from Six Years of Surveys." *The Forum* 18(1).

Ban, Pamela, Maxwell Palmer, and Benjamin Schneer. 2019. "From the Halls of Congress to K Street: Government Experience and its Value for Lobbying." *Legislative Studies Quarterly* 44(4): 713–752.

Palmer, Maxwell and Benjamin Schneer. 2019. "Postpolitical Careers: How Politicians Capitalize on Public Office." *Journal of Politics* 81(2): 670–675.

Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. 2019. "Who Participates in Local Government? Evidence from Meeting Minutes." *Perspectives on Politics* 17(1): 28–46.
– Winner of the Heinz Eulau Award, American Political Science Association, 2020.

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2019. "City Learning: Evidence of Policy Information Diffusion From a Survey of U.S. Mayors." *Political Research Quarterly* 72(1): 243–258.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. "Do Mayors Run for Higher Office? New Evidence on Progressive Ambition." *American Politics Research* 48(1) 197–221.

Ansolabehere, Stephen, Maxwell Palmer and Benjamin Schneer. 2018. "Divided Government and Significant Legislation, A History of Congress from 1789-2010." *Social Science History* 42(1): 81–108.

Edwards, Barry, Michael Crespin, Ryan D. Williamson, and Maxwell Palmer. 2017. "Institutional Control of Redistricting and the Geography of Representation." *Journal of Politics* 79(2): 722–726.

Palmer, Maxwell. 2016. "Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?" *Journal of Empirical Legal Studies* 13(1): 153–177.

Palmer, Maxwell and Benjamin Schneer. 2016. "Capitol Gains: The Returns to Elected Office from Corporate Board Directorships." *Journal of Politics* 78(1): 181–196.

Gerring, John, Maxwell Palmer, Jan Teorell, and Dominic Zarecki. 2015. "Demography and Democracy: A Global, District-level Analysis of Electoral Contestation." *American Political Science Review* 109(3): 574–591.

OTHER
PUBLICATIONS

Einstein, Katherine Levine, David M. Glick and Maxwell Palmer. 2020. "Neighborhood Defenders: Participatory Politics and America's Housing Crisis." *Political Science Quarterly* 135(2): 281–312.

Ansolabehere, Stephen and Maxwell Palmer. 2016. "A Two Hundred-Year Statistical History of the Gerrymander." *Ohio State Law Journal* 77(4): 741–762.

Ansolabehere, Stephen, Maxwell Palmer, and Benjamin Schneer. 2016. "What Has Congress Done?" in *Governing in a Polarized Age: Elections, Parties, and Political Representation in America*, eds. Alan Gerber and Eric Schickler. New York, NY: Cambridge University Press.

POLICY
REPORTS

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. Looking back on ARPA and America's Cities: A Menino Survey Reflection. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2022. Representation in the Housing Process: Best Practices for Improving Racial Equity. Research Report. The Boston Foundation.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. 2021 Menino Survey of Mayors: Closing the Racial Wealth Gap. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2021. 2021

Menino Survey of Mayors: Building Back Better. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, Stacy Fox, Katharine Lusk, Nicholas Henninger, and Songhyun Park. 2021. 2020 Menino Survey of Mayors: Policing and Protests. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2020. 2020 Menino Survey of Mayors: COVID-19 Recovery and the Future of Cities. Research Report. Boston University Initiative on Cities.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2020. Got Wheels? How Having Access to a Car Impacts Voting. *Democracy Docket*.

Palmer, Maxwell, Katherine Levine Einstein, and David Glick. 2020. Counting the City: Mayoral Views on the 2020 Census. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, Stacy Fox, Marina Berardino, Noah Fischer, Jackson Moore-Otto, Aislinn O'Brien, Marilyn Rutecki and Benjamin Wuesthoff. 2020. COVID-19 Housing Policy. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, David Glick, and Stacy Fox. 2020. Mayoral Views on Cities' Legislators: How Representative are City Councils? Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2020. "Newton and other communities must reform housing approval process." *The Boston Globe*.

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2020. "2019 Menino Survey of Mayors." Research Report. Boston University Initiative on Cities.

Palmer, Maxwell, Katherine Levine Einstein, David Glick, and Stacy Fox. 2019. Mayoral Views on Housing Production: Do Planning Goals Match Reality? Research Report. Boston University Initiative on Cities.

Wilson, Graham, David Glick, Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2019. Mayoral Views on Economic Incentives: Valuable Tools or a Bad Use of Resources?. Research Report. Boston University Initiative on Cities

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2019. "2018 Menino Survey of Mayors." Research Report. Boston University Initiative

on Cities.

Einstein, Katherine Levine, Katharine Lusk, David Glick, Maxwell Palmer, Christiana McFarland, Leon Andrews, Aliza Wasserman, and Chelsea Jones. 2018. "Mayoral Views on Racism and Discrimination." National League of Cities and Boston University Initiative on Cities.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. "As the Trump administration retreats on climate change, US cities are moving forward." The Conversation.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. "Few big-city mayors see running for higher office as appealing." LSE United States Politics and Policy Blog.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. "2017 Menino Survey of Mayors." Research Report. Boston University Initiative on Cities.

Williamson, Ryan D., Michael Crespin, Maxwell Palmer, and Barry C. Edwards. 2017. "This is how to get rid of gerrymandered districts." The Washington Post, Monkey Cage Blog.

Palmer, Maxwell and Benjamin Schneer. 2015. "How and why retired politicians get lucrative appointments on corporate boards. " The Washington Post, Monkey Cage Blog.

CURRENT PROJECTS
"A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure" (with Benjamin Schneer and Kevin DeLuca).
– Covered in Fast Company

"Descended from Immigrants and Revolutionists: How Family Immigration History Shapes Legislative Behavior in Congress" (with James Feigenbaum and Benjamin Schneer).

"The Gender Pay Gap in Congressional Offices" (with Joshua McCrain).

"Racial Disparities in Local Elections" (with Katherine Levine Einstein).

"Renters in an Ownership Society: Property Rights, Voting Rights, and the Making of American Citizenship." Book Project. With Katherine Levine Einstein.

"Menino Survey of Mayors 2021." Co-principal investigator with David M. Glick and Katherine Levine Einstein.

GRANTS
AND AWARDS

The Boston Foundation Grant. "2022 Greater Boston Housing Report Card" (Co-principal investigator). 2022. $70,000.

The Rockefeller Foundation, "Menino Survey of Mayors" (Co-principal investigator). 2021. $355,000.

American Political Science Association, Heinz Eulau Award, for the best article published in *Perspectives on Politics* during the previous calendar year, for "Who Participates in Local Government? Evidence from Meeting Minutes." (with Katherine Levine Einstein and David M. Glick). 2020.

Boston University Initiative on Cities, COVID-19 Research to Action Seed Grant. "How Are Cities Responding to the COVID-19 Housing Crisis?" 2020. $8,000.

The Rockefeller Foundation, "Menino Survey of Mayors" (Co-principal investigator). 2017. $325,000.

Hariri Institute for Computing, Boston University. Junior Faculty Fellow. 2017–2020. $10,000.

The Rockefeller Foundation, "2017 Menino Survey of Mayors" (Co-principal investigator). 2017. $100,000.

The Center for Finance, Law, and Policy, Boston University, Research Grant for "From the Capitol to the Boardroom: The Returns to Office from Corporate Board Directorships," 2015.

Senator Charles Sumner Prize, Dept. of Government, Harvard University. 2014.
  Awarded to the best dissertation "from the legal, political, historical, economic, social or ethnic approach, dealing with means or measures tending toward the prevention of war and the establishment of universal peace."

The Center for American Political Studies, Dissertation Research Fellowship on the Study of the American Republic, 2013–2014.

The Tobin Project, Democracy and Markets Graduate Student Fellowship, 2013–2014.

The Dirksen Congressional Center, Congressional Research Award, 2013.

The Institute for Quantitative Social Science, Conference Travel Grant, 2014.

The Center for American Political Studies, Graduate Seed Grant for "Capitol Gains: The Returns to Elected Office from Corporate Board Directorships," 2014.

The Institute for Quantitative Social Science, Research Grant, 2013.

Bowdoin College: High Honors in Government and Legal Studies; Philo Sherman Bennett Prize for Best Honors Thesis in the Department of Government, 2008.

SELECTED
PRESENTATIONS

"A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure." MIT Election Data and Science Lab, 2020.

"Who Represents the Renters?" Local Political Economy Conference, Washington, D.C., 2019.

"Housing and Climate Politics," Sustainable Urban Systems Conference, Boston University 2019.

"Redistricting and Gerrymandering," American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2019.

"The Participatory Politics of Housing," Government Accountability Office Seminar, 2018.

"Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Immigration Votes in Congress," Congress and History Conference, Princeton University, 2018.

"Identifying Gerrymanders at the Micro- and Macro-Level." Hariri Institute for Computing, Boston University, 2018.

"How Institutions Enable NIMBYism and Obstruct Development," Boston Area Research Initiative Spring Conference, Northeastern University, 2017.

"Congressional Gridlock," American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2016.

"Capitol Gains: The Returns to Elected Office from Corporate Board Directorships," Microeconomics Seminar, Department of Economics, Boston University, 2015.

"A Two Hundred-Year Statistical History of the Gerrymander," Congress and History Conference, Vanderbilt University, 2015.

"A New (Old) Standard for Geographic Gerrymandering," Harvard Ash Center Workshop: How Data is Helping Us Understand Voting Rights After Shelby County, 2015.

"Capitol Gains: The Returns to Elected Office from Corporate Board Director-ships," Boston University Center for Finance, Law, and Policy, 2015.

"Capitol Gains: The Returns to Elected Office from Corporate Board Director-ships," Bowdoin College, 2014.

American Political Science Association: 2013, 2014, 2015, 2016, 2018, 2019, 2020
Midwestern Political Science Association: 2012, 2013, 2014, 2017, 2019
Southern Political Science Association: 2015, 2018
European Political Science Association: 2015

EXPERT
TESTIMONY
AND CONSULTING

Bethune-Hill v. Virginia (3:14-cv-00852-REP-AWA-BMK), U.S. District Court for the Eastern District of Virginia. Prepared expert reports and testified on racial predominance and racially polarized voting in selected districts of the 2011 Virginia House of Delegates map. (2017)

Thomas v. Bryant (3:18-CV-441-CWR-FKB), U.S. District Court for the Southern District of Mississippi. Prepared expert reports and testified on racially polarized voting in a district of the 2012 Mississippi State Senate map. (2018–2019)

Chestnut v. Merrill (2:18-cv-00907-KOB), U.S. District Court for the Northern District of Alabama. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Alabama congressional district map. (2019)

Dwight v. Raffensperger (No. 1:18-cv-2869-RWS), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Georgia congressional district map. (2019)

Bruni, et al. v. Hughs (No. 5:20-cv-35), U.S. District Court for the Southern District of Texas. Prepared expert reports and testified on the use of straight-ticket voting by race and racially polarized voting in Texas. (2020)

Caster v. Merrill (No. 2:21-cv-1536-AMM), U.S. District Court for the Northern District of Alabama. Prepared expert report and testified on racially polarized voting in selected districts of the 2021 Alabama congressional district map. (2022)

Pendergrass v. Raffensperger (1:21-CV-05339-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia congressional district map. (2022)

Grant v. Raffensperger (1:22-CV-00122-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia state legislative district maps.

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(2022)

Galmon, et al. v. Ardoin (3:22-cv-00214-SDD-SDJ), U.S. District Court for the Middle District of Louisiana. Prepared expert reports and testified on racially polarized voting for the 2021 Louisiana congressional district map. (2022)

Racially Polarized Voting Consultant, Virginia Redistricting Commission, August 2021.

The General Court of the Commonwealth of Massachusetts, Joint Committee on Housing, Hearing on Housing Production Legislation. May 14, 2019. Testified on the role of public meetings in housing production.

TEACHING

Boston University

- *Introduction to American Politics* (PO 111; Fall 2014, Fall 2015, Fall 2016, Fall 2017, Spring 2019, Fall 2019, Fall 2020)
- *Congress and Its Critics* (PO 302; Fall 2014, Spring 2015, Spring 2017, Spring 2019)
- *Data Science for Politics* (PO 399; Spring 2020, Spring 2021, Fall 2021, Fall 2022)
- *Formal Political Theory* (PO 501; Spring 2015, Spring 2017, Fall 2019, Fall 2020)
- *American Political Institutions in Transition* (PO 505; Spring 2021, Fall 2021)
- *Prohibition* (PO 540; Fall 2015, Fall 2022)
- *Political Analysis (Graduate Seminar)* (PO 840; Fall 2016, Fall 2017)
- *Graduate Research Workshop* (PO 903/4; Fall 2019, Spring 2020)

SERVICE

Boston University

- Research Computing Governance Committee, 2021–.
- Initiative on Cities Faculty Advisory Board, 2020–2022.
- Undergraduate Assessment Working Group, 2020-2021.
- College of Arts and Sciences
    - Search Committee for the Faculty Director of the Initiative on Cities, 2020–2021.
    - General Education Curriculum Committee, 2017–2018.
- Department of Political Science
    - Director of Advanced Programs (Honors & B.A./M.A.). 2020–.
    - Political Methodology Search Committee, 2021.

- Delegate, Chair Selection Advisory Process, 2021.
- Comprehensive Exam Committee, American Politics, 2019.
- Comprehensive Exam Committee, Political Methodology, 2016, 2017, 2021.
- Co-organizer, Research in American Politics Workshop, 2016–2018.
- American Politics Search Committee, 2017.
- American Politics Search Committee, 2016.
- Graduate Program Committee, 2014–2015, 2018–2019, 2020–2021.

Co-organizer, *Boston University Local Political Economy Conference*, August 29, 2018.

Editorial Board Member, *Legislative Studies Quarterly*, 2020–Present

Malcolm Jewell Best Graduate Student Paper Award Committee, Southern Political Science Association, 2019.

Reviewer: *American Journal of Political Science*; *American Political Science Review*; *Journal of Politics*; *Quarterly Journal of Political Science*; *Science*; *Political Analysis*; *Legislative Studies Quarterly*; *Public Choice*; *Political Science Research and Methods*; *Journal of Law, Economics and Organization*; *Election Law Journal*; *Journal of Empirical Legal Studies*; *Urban Affairs Review*; *Applied Geography*; *PS: Political Science & Politics*; Cambridge University Press; Oxford University Press.

Elected Town Meeting Member, Town of Arlington, Mass., Precinct 2. April 2021–Present.

Arlington Election Reform Committee Member, August 2019–April 2022.

Coordinator, Harvard Election Data Archive, 2011–2014.

OTHER EXPERIENCE

Charles River Associates, Boston, Massachusetts   2008–2010

Associate, Energy & Environment Practice
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