

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION**

RODNEY D. PIERCE and  
MOSES MATTHEWS,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD  
OF ELECTIONS, et al.,

Defendants.

Case No. 4:23-cv-193-D

**REPLY IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTION  
FOR EXPEDITED BRIEFING AND DECISION ON PLAINTIFFS' FORTHCOMING  
MOTION FOR PRELIMINARY INJUNCTION**

The Court should adopt an expedited schedule that will enable a decision on Plaintiffs' motion for a preliminary injunction, which was filed today, before candidate filing begins on December 4. In response to Legislative Defendants' opposition, Plaintiffs state as follows:

1. Legislative Defendants assert that Plaintiffs unreasonably waited four weeks to file this lawsuit and seek a preliminary injunction. *E.g.*, Opp. 2, 3, 4. That is backwards. The General Assembly unreasonably delayed *six months* before enacting the 2023 Senate map, from the North Carolina Supreme Court's April 28, 2023 decision in *Harper III* until October 25, 2023. Legislative Defendants offer no explanation for this six-month delay in enacting the map.

2. Contrary to Legislative Defendants' suggestion, Plaintiffs and their counsel worked diligently to prepare their Complaint, preliminary injunction motion, and supporting expert and other materials as fast as possible. Proving a violation of Section 2 of the VRA requires expert analyses, and Plaintiffs could not reasonably proceed until those analyses were undertaken.

3. Legislative Defendants assert that they now need equal or more time to prepare

their own expert analyses, including analysis of racially polarized voting. Opp. 4-5. But Legislative Defendants were legally obligated to undertake that analysis *before* enacting the challenged map. The Voting Rights Act required it, as the North Carolina Supreme Court’s decision in *Stephenson v. Bartlett* confirms. 562 S.E.2d 377, 396-97 (N.C. 2002). If the General Assembly enacted this Senate map without analyzing racially polarized voting or the feasibility of creating a compact, reasonably configured majority-Black district in northeastern North Carolina, that is simply an admission that they failed even to attempt to comply with Section 2 of the VRA.

4. Legislative Defendants cannot seriously feign surprise at being sued given the essential facts regarding the relevant region of the State. It is beyond dispute that the State has eight counties that are majority Black, that those eight counties form a contiguous area in northeastern North Carolina, that the Black citizens of those counties are historically disadvantaged compared to white citizens in the rest of the State, that racially polarized voting in this region exists and persists, and that the Black population in the region is large enough to form a compact, reasonably configured Senate district that adheres to traditional redistricting criteria.

5. Legislative Defendants assert that the plaintiffs’ expert in *Common Cause v. Lewis* found in 2019 that “there was no legally significant racially polarized voting in 7 of the 8 counties in Plaintiffs proposed illustrative district.” Opp. 5. That is false. The expert there, Dr. Lisa Handley, did not analyze or address racially polarized voting in *any* of the Black Belt counties at issue in this case—not one. Dr. Handley’s report specified all of the counties that she analyzed:

The 13 state House groupings I examined were: (1) Alamance; (2) Anson and Union; (3) Cabarrus, Davie, Montgomery, Richmond, Rowan and Stanly; (4) Cleveland and Gaston; (5) Columbus, Pender and Robeson; (6) Cumberland; (7) Duplin and Onslow; (8) Forsyth and Yadkin; (9) Franklin and Nash; (10) Guilford; (11) Lenoir and Pitt; (12) Mecklenburg; and (13) Wake. The 5 state Senate county groupings were: (1) Alamance, Guilford and Randolph; (2) Davie and Forsyth; (3) Duplin, Harnett, Johnson, Lee, Nash and Sampson; (4) Franklin and Wake; and (5) Mecklenburg.

*See* 2019 Handley Report at 3-4 (attached as Exhibit A). And Dr. Handley specifically noted that “given the differences in voting patterns that exist across North Carolina, my analysis cannot be extrapolated to other counties and districts not analyzed in this report ....” *Id.* at 1.

6. Legislative Defendants (at 5) also point to *Harris v. McCrory*, 159 F. Supp. 3d 600 (M.D.N.C. 2016), but the court there principally found that the legislature could not justify packing Black voters into Congressional District 1 (CD1) on the basis of the VRA when it had not *conducted* any racially polarized voting analysis. *Id.* at 624-25. Moreover, CD1 in the 2011 congressional map contained large portions of Durham; white cross-over voting in CD1 does not suggest white cross-over voting in the areas at issue here.

7. Legislative Defendants’ objections to Plaintiffs’ proposed demonstration districts are meritless. They note that Plaintiffs’ Demonstration District A would require “break[ing] up county groupings mandated by *Stephenson*,” Opp. 6, but the Voting Rights Act trumps North Carolina’s county-groupings rule. What *Stephenson* “mandates” is that the General Assembly draw any VRA districts *before* constructing county groupings. 562 S.E.2d at 396-97. In any event, Plaintiffs are not urging adoption of District A for use in any election. Legislative Defendants also note that Plaintiffs’ Demonstration District B-1 has a Black voting age population (BVAP) of slightly less than 50% (specifically, 48.41%), but its Black *citizen* voting age population (Black CVAP)—a recognized measure in VRA Section 2 cases—is *over* 50% (specifically 50.19%). Furthermore, a district that is created to remedy a Section 2 violation does not need to have a Black majority by any measure, so long as it will perform for Black-preferred candidates, which District B-1 will. And Demonstration Districts B-1 and B-2 do not create any “ripple effects” (Opp. 6) or require any adjustments to any districts or county groupings other than enacted Districts 1 and 2.

8. Legislative Defendants noted that they had not received block equivalency files for

Plaintiffs' Demonstration Districts. Those block equivalency files have now been sent.

9. Legislative Defendants note that they and their counsel and experts will have to work over Thanksgiving weekend and are busy working on other cases. Opp. 2, 7. While we appreciate that working over a holiday weekend is a burden, it cannot compare to the burden on the many tens of thousands of Black voters in northeastern North Carolina who, absent a preliminary injunction, will be forced to vote in unlawful districts that deny them representation in the state Senate and equal participation in the State's political process. And respectfully, the other work commitments of Legislative Defendants' chosen counsel are irrelevant.

In conclusion, the Court can and should adopt an expedited schedule to facilitate a decision on the preliminary injunction motion before candidate filing opens on December 4. Alternatively, if the Court determines that more time is needed, the Court can and should stay candidate filing in enacted Senate Districts 1 and 2 pending further order of the Court.

Dated: November 22, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record.

Dated: November 22, 2023

/s/ Edwin M. Speas, Jr.  
Edwin M. Speas, Jr.

# Exhibit A

**Providing Black Voters with an Opportunity to Elect Candidates of Choice to the North Carolina State Legislature: A Jurisdiction-Specific, Functional Analysis of Select House and Senate County Grouping**

Lisa Handley

September 17, 2019

**I. Scope of Report**

I was asked by counsel for Plaintiffs in this matter to conduct an analysis of voting patterns in select state House and Senate county groupings in North Carolina and, if voting in an election contest is racially polarized, to calculate the percent black voting age population necessary to provide black voters with an opportunity to elect their candidate of choice. In one county (Robeson County), I also performed these calculations for the Native American population.

The district-specific, functional analysis I performed is specific to those counties and districts presented in this report. Particularly given the differences in voting patterns that exist across North Carolina, my analysis cannot be extrapolated to other counties and districts not analyzed in this report, including districts that currently have African American representatives that I did not evaluate.

**II. Professional Experience**

I have over thirty years of experience as a voting rights and redistricting expert. I have advised scores of jurisdictions and other clients on minority voting rights and redistricting-related issues and have served as an expert in more than 25 voting rights cases. My clients have included state and local jurisdictions, the U.S. Department of Justice, national civil rights organizations, and such international organizations as the United Nations.

I have been actively involved in researching, writing and teaching on subjects relating to voting rights, including minority representation, electoral system design and redistricting. I co-authored a book, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992), and co-edited a volume, *Redistricting in Comparative Perspective* (Oxford University Press, 2008), on these subjects. In addition, my research on these topics has appeared in peer-reviewed journals such as *Journal of Politics*, *Legislative Studies Quarterly*,

*American Politics Quarterly*, *Journal of Law and Politics*, and *Law and Policy*, as well as in edited books and law reviews.

I am one of the co-authors of the 2001 *North Carolina Law Review* article, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,”<sup>1</sup> relied on by one of Defendants’ experts in this case, Dr. Jeffrey Lewis. In addition to writing this piece, I have used the approach outlined in it to conduct numerous district-specific, functional analyses both for interested jurisdictions and in the context of litigation. For example, most recently, I was asked to ascertain the percent black voting age population that would allow black voters an opportunity to elect their candidates of choice in the challenged 3<sup>rd</sup> Congressional District in Virginia,<sup>2</sup> and the 11<sup>th</sup> Congressional District in Ohio.<sup>3</sup>

I have been a principal of Frontier International Electoral Consulting since co-founding the company in 1998. Frontier IEC provides electoral assistance in transitional democracies and post-conflict countries. In addition, I am a Visiting Research Academic at Oxford Brookes University in Oxford, United Kingdom. Attached to the end of this report is a copy of my *curriculum vitae*. I am being compensated at a rate of \$300 an hour for my work in this case.

### **III. County Groupings and Elections Examined**

Conclusions about racially polarized voting and the minority population percentage needed to elect minority-preferred candidates in the context of polarization should be drawn from as many elections as applicable and feasible. It is well-established that racial voting patterns in elections that include minority candidates are the most probative for determining if voting is racially polarized.<sup>4</sup> In addition, elections for the office at issue in a lawsuit – in this

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<sup>1</sup> Bernard Grofman, Lisa Handley and David Lublin, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,” *North Carolina Law Review*, volume 79 (5), June 2001.

<sup>2</sup> *Personhuballah v. Alcorn*, No. 3:13-cv-678 (E.D. Va.).

<sup>3</sup> *Ohio A. Philip Randolph Inst. v. Householder*, No. 1:18-CV-357 (S.D. Ohio).

<sup>4</sup> See, for example, *League of United Latin Am. Citizens, Council No. 4434 v. Clements*, 999 F.2d 831, 864 (5th Cir. 1993); *Nipper v. Smith*, 39 F.3d 1494, 1540 (11th Cir. 1994).



case, state House and state Senate seats – are the most relevant,<sup>5</sup> both for determining if voting is usually polarized and for calculating the percent minority population needed to elect minority-preferred candidates to the office if voting is racially polarized.

I analyzed all contested state legislative general and Democratic primary election contests since 2014 that included an African American candidate in the state Senate and state House county groupings at issue in this case.<sup>6</sup> I also examined all recent statewide state and federal elections – general elections and Democratic primaries – that included an African American candidate. A statewide analysis of voting patterns in two of these contests, the 2016 primary elections for Governor and Supervisor of Public Instruction, indicated that voting was not polarized – both black and white voters supported the winning white candidate.<sup>7</sup> I therefore focused my analysis on the following 2016 statewide contests for each state House and Senate grouping at issue: the general elections for Lieutenant Governor and State Treasurer and the Democratic primaries for Lieutenant Governor, Attorney General, Commissioner of Labor and Treasurer. In addition, I analyzed the 2012 general elections for U.S. President and Lieutenant Governor, and the 2012 Democratic primaries for Lieutenant Governor and Commissioner of Labor. While these contests were polarized statewide, they were not necessarily polarized in every given county grouping. Some of the primary elections considered had three or more candidates; although black voters often coalesced around a single candidate in some of these contests, in other instances they did not and determining a candidate of choice was not possible.

The 13 state House groupings I examined were: (1) Alamance; (2) Anson and Union; (3) Cabarrus, Davie, Montgomery, Richmond, Rowan and Stanly; (4) Cleveland and Gaston; (5) Columbus, Pender and Robeson; (6) Cumberland; (7) Duplin and Onslow; (8) Forsyth and Yadkin; (9) Franklin and Nash; (10) Guilford; (11) Lenoir and Pitt; (12) Mecklenburg; and (13)

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<sup>5</sup> Courts have long held that endogenous elections are more probative in assessing minority vote dilution. Examples include *Bone Shirt V. Hazeltine* 461 F.3d 1011, 1020 (8th Cir. 2006); *Clay v. Bd. of Educ. of City of St. Louis*, 90 F.3d 1357, 1362 (8th Cir. 1996); *Magnolia Bar Ass'n, Inc. v. Lee* 994 F.2d 1143, 1149 (5th Cir. 1993); *Jenkins v. Red Clay Consol. School 25 Dist. Bd. of Educ.* 4 F.3d 1103 (3d Cir. 1993); *Citizens for a Better Gretna v. City of Gretna, La.* 834 F.2d 496, 502 (5th Cir. 1987); *Rodriguez v. Harris Cnty, Texas* 964 19 F. Supp. 2d 686, 759 (S.D. Tex. 2013).

<sup>6</sup> In North Carolina, most black voters choose to vote in Democratic primaries as opposed to Republican primaries.

<sup>7</sup> This report does not address the extent to which the 2016 Democratic primaries for Governor and Supervisor of Public Instruction were racially polarized in any specific county grouping.

Wake. The 5 state Senate county groupings were: (1) Alamance, Guilford and Randolph; (2) Davie and Forsyth; (3) Duplin, Harnett, Johnson, Lee, Nash and Sampson; (4) Franklin and Wake; and (5) Mecklenburg.<sup>8</sup>

**IV. Success Rates of African American State Legislative Candidates**

While African American state legislators have generally been elected from legislative districts with substantial black populations within the county groupings at issue here, these districts are usually not majority black in voting age population and in many cases are below or substantially below 40% in voting age population. Table 1 lists all state Senate districts under the 2017 Senate Plan that had a BVAP greater than 30% and encompass at least one county at issue in the remedial phase of this case. The table also shows the results of the 2018 election in each of these districts.

**Table 1: State Senators Elected from Districts with Black Voting Age Populations Greater the 30% in Relevant Counties**

2017 Senate Plan District	Percent Black Voting Age Population	State Senator	Race	Party	Share of two-party vote in 2018 general election	Senate County Grouping
38	48.46%	Mujtaba Mohammed	O	D	81.7%	Mecklenburg
28	43.64%	Gladys Robinson	AA	D	75.2%	Alamance-Guilford-Randolph
37	42.73%	Jeff Jackson	W	D	79.6%	Mecklenburg
21	42.15%	Ben Clark	AA	D	70.9%	Cumberland-Hoke
32	39.18%	Paul Lowe, Jr.	AA	D	72.9%	Davie-Forsyth
40	38.88%	Joyce Waddell	AA	D	75.6%	Mecklenburg
14	38.85%	Dan Blue	AA	D	73.4%	Franklin-Wake
7	33.93%	Louis Milford Pate, Jr.	W	R	53.9%	Lenoir-Wayne
5	32.94%	Don Davis	AA	D	55.3%	Greene-Pitt
19	31.69%	Kirk DeViere	W	D	50.4%	Cumberland-Hoke

If the Democratic candidate represented the candidate of choice for African Americans in each of the general elections listed in Table 1, then African Americans were able to elect the

<sup>8</sup> Mecklenburg results are reported under the state House grouping but the discussion of course holds for the state Senate as well.

candidate of their choice in 9 of the 10 districts with a BVAP in excess of 30% in relevant Senate county groupings, and the majority of these successful candidates were African Americans. To be clear, Table 1 merely displays past election results; this analysis is not meant to suggest that a BVAP of 30% is a bright-line percentage that is either necessary or sufficient for African Americans to elect a candidate of their choice, either in the county groupings depicted in Table 1 or in other counties not in Table 1. Indeed, Table 1 does not include results for numerous counties across the State because those counties do not currently have state Senate districts with a BVAP above 30% or are not at issue in the remedial phase of this lawsuit. The results could differ significantly for such other counties.

Table 2 provides the same information as Table 1 for all state House districts under the 2017 House Plan that had a BVAP greater than 30% and encompass at least one county at issue in the remedial phase of this case.

**Table 2: State Representative Elected from Districts with Black Voting Age Populations Greater the 30% in Relevant Counties**

2017 House Plan District	Percent Black Voting Age Population	State Representative	Race	Party	Share of two-party vote in 2018 general election	House County Grouping
101	50.8%	Carolyn Logan	AA	D	78.7%	Mecklenburg
43	50.0%	Elmer Floyd	AA	D	74.1%	Cumberland
99	49.5%	Nasif Majeed	AA	D	82.4%	Mecklenburg
107	49.4%	Kelly Alexander	AA	D	100.0%	Mecklenburg
38	48.3%	Yvonne Lewis Holley	AA	D	84.1%	Wake
72	47.5%	Derwin Montgomery	AA	D	79.1%	Forsyth-Yadkin
8	44.9%	Kandie D. Smith	AA	D	64.6%	Lenoir-Pitt
33	44.2%	Rosa U. Gill	AA	D	78.7%	Wake
102	43.9%	Becky Carney	W	D	83.4%	Mecklenburg
58	42.7%	Amos Quick	AA	D	76.8%	Guilford
42	42.2%	Marvin W. Lucas	AA	D	78.1%	Cumberland
25	40.7%	James D. Gailliard	AA	D	53.3%	Franklin-Nash
61	40.3%	Mary Price Harrison	W	D	73.3%	Guilford
60	40.1%	Cecil Brockman	AA	D	69.0%	Guilford
21	39.0%	Raymond Smith Jr.	AA	D	52.6%	Bladen-Greene-Harnett-Johnston-Lee-Sampson-Wayne
88	38.4%	Mary G. Belk	W	D	75.6%	Mecklenburg
57	38.4%	Ashton Clemmons	W	D	67.6%	Guilford
106	38.0%	Carla Cunningham	AA	D	80.6%	Mecklenburg
12	37.4%	Chris Humphrey	W	R	56.1%	Lenoir-Pitt

2017 House Plan District	Percent Black Voting Age Population	State Representative	Race	Party	Share of two-party vote in 2018 general election	House County Grouping
71	36.6%	Evelyn Terry	AA	D	72.7%	Forsyth-Yadkin
39	35.5%	Darren Jackson	W	D	67.9%	Wake
100	32.1%	John Autry	W	D	70.8%	Mecklenburg
44	31.8%	Billy Richardson	W	D	56.6%	Cumberland
22	31.5%	William Brisson	W	R	43.3%	Bladen-Greene-Harnett-Johnston-Lee-Sampson-Wayne
92	30.2%	Chaz Beasley	AA	D	70.0%	Mecklenburg

As in the Senate, if the Democratic candidate represented the candidate of choice for African Americans in each of the general elections listed in Table 2, then African Americans were able to elect the candidate of their choice in 23 of the 25 districts with a BVAP in excess of 30% in relevant House county groupings, and the majority of these successful candidates were African Americans. In addition to the African American state representatives listed above, there are two elected from districts that do not have substantial black populations: Sydney Batch is elected from a 14.3% BVAP district in Wake County, and Brandon Lofton is elected from a 6.2% BVAP district in Mecklenburg County. The same clarifications apply, however, for this analysis as with the Senate. This analysis is not meant to suggest that a BVAP of 30% is a bright-line percentage that is either necessary or sufficient for African Americans to elect a candidate of their choice, either in the county groupings depicted in Table 2 or in other counties not in Table 2. As before, Table 2 does not include results for numerous counties across the State because those counties do not currently have state House districts with a BVAP above 30% or are not at issue in the remedial phase of this lawsuit, and the results could differ significantly for such other counties.

#### V. Analyzing Voting Patterns by Race

In addition to the above analysis, I have conducted a systematic analysis to determine what percent BVAP would be required to provide black voters the opportunity to elect their preferred candidates in state legislative as well as statewide contests in relevant county groupings. For each election analyzed, I report the participation rates of black and white voters, as well as the percentage of black and white support for the black-preferred candidate. If the

contest is polarized, with black and white voters supporting different candidates, I indicate the percentage BVAP required, given the participation rates and voting patterns of black and white voters, for the black-preferred candidate to win in the given election contest.

In this report, I discuss black and white voting behavior but in reality the analysis considers black and non-black voting behavior. While in most areas of the state, non-black voters are mostly white, this is not true of Roberson County, which has a substantial Native American population. I consider not only blacks and non-blacks, but Native Americans and non-Native Americans for this county.

The voting patterns of black and white voters must be estimated using statistical techniques because direct information about how individuals have voted is simply not available – the race of the voter is not, of course, obtainable from the ballot. I used a standard statistical technique to produce estimates, King’s ecological inference (EI).<sup>9</sup> Developed by Professor Gary King in the 1990s and later refined, this statistical method utilizes the method of bounds and incorporates maximum likelihood statistics to produce estimates of voting patterns by race.<sup>10</sup> King’s EI has been introduced and accepted in numerous district court proceedings.<sup>11</sup>

The database used for this analysis matched demographic data for each election precinct – white, black and Native American VAP, based on the 2010 census – with the election results for the precinct.<sup>12</sup> The use of VAP data made sense in this case since participation as a product

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<sup>9</sup> The statistical package I used was *r* for the ecological regression analysis and *eiCompare* for *r* for the ecological inference analysis.

<sup>10</sup> The following is an example of how the method of bounds works: if a given precinct has 100 voters, of which 75 are black and 25 are white, and the African American candidate received 80 votes, then at least 55 of the black voters (80 – 25) voted for the African American candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for white voters, as anywhere between none of the white voters and all of the white voters could have voted for the candidate.) These bounds are used when calculating EI estimates but not when using ecological regression.

<sup>11</sup> A list of cases in which King’s EI was used can be found in Justin de Benedictis-Kessner, “Evidence in Voting Rights Litigation: Producing Accurate Estimates of Racial Voting Patterns,” *Election Law Journal*, vol.14 (4), 2015. This article also discusses other statistical approaches to analyzing voting patterns by race in voting rights litigation, including homogeneous precinct analysis and ecological regression (ER).

<sup>12</sup> Some of the precinct VAP data could not be matched with election results. The degree to which this occurred varied by county, with some counties assigning early and absentee votes back to the election precinct and other counties not doing this. In addition, if counties combined or split election precincts for an election, these results could not be matched up to the correct demographic data.

of VAP is required to determine the percentage of black VAP necessary for the candidate of choice of black voters to win the given election.

## **VI. Calculating the Percent Black Voting Age Population Needed to Elect Black-Preferred Candidate**

The percentage minority population needed to create a district that provides minorities with an opportunity to elect their candidates of choice varies depending on the specific location of the district – there is no single universal or statewide target that can be applied. A district-specific, functional analysis that considers the participation rates and voting patterns of whites and minorities must be conducted to determine the percentage of the minority population that is needed to provide minority voters with an opportunity to elect candidates of their choice. Relying on the estimates of black and white voting behavior produced by the racial bloc voting analysis I conducted, in each election contest that was polarized, I calculated the percent BVAP needed for the candidate of choice of African Americans to win. When voting is not racially polarized in a given election and area, we need not calculate the percent BVAP needed for the black-preferred candidate to win since black and white voters in that instance support the same candidate.

### **A. Equalizing Turnout**

Black turnout as a percentage of BVAP is generally somewhat lower than white turnout as a percentage of WVAP in the general elections analyzed. For example, according to Table 3, below, in Alamance in the 2016 general election for Lieutenant Governor, 44.7% of blacks of voting age turned out and cast a vote, while 70.6% of whites of voting age cast a vote.<sup>13</sup> Using these turnout percentages, I can calculate the percent black VAP needed to ensure that black voters

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<sup>13</sup> In this example, turnout actually refers to the percent of black and white VAP voting for the highest statewide office on the ticket that included an African American candidate in the general election – the race for Lieutenant Governor.

comprise at least 50 percent of the voters for this election.<sup>14</sup> The equalizing percentage is calculated mathematically by solving the following equation:

Let  
M = the proportion of the district's voting age population that is black  
W = 1-M = the proportion of the district's voting age population that is white  
A = the proportion of the black voting age population that turned out to vote  
B = the proportion of the white voting age population that turned out to vote

Therefore,  
M(A) = the proportion of the population that is black and turned out to vote (1)  
(1-M)B = the proportion of total population that is white and turned out to vote (2)

To find the value of M that is needed for (1) and (2) to be equal, (1) and (2) are set as equal and we solve for M algebraically:

$$\begin{aligned}M(A) &= (1 - M)B \\M(A) &= B - M(B) \\M(A) + M(B) &= B \\M(A + B) &= B \\M &= B / (A+B)\end{aligned}$$

Thus, for the example above,  $A = .447$ ,  $B = .706$  and  $M = .706 / (.447 + .706)$ . Therefore, a 61.2% BVAP district would produce equalized black and white turnout in the 2016 general election in this county grouping.

The equalizing percentage for BVAP in Democratic primaries in North Carolina is much lower than in general elections. This is because most black voters choose to vote in Democratic primaries while white voters tend to divide their votes between the Democratic and Republican primaries. For example, for the same county (Alamance), black turnout as a percentage of BVAP was 14.9 and white turnout as a percentage of WVAP was 8.3.<sup>15</sup> (See Table 3, below.) The percentage BVAP required to equalize black and white turnout in the Democratic primary in this instance is only 35.8%.

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<sup>14</sup> For a more in-depth discussion of equalizing turnout see Kimball Brace, Bernard Grofman, Lisa Handley and Richard Niemi, "Minority Voting Equality: The 65 Percent Rule in Theory and Practice," *Law and Policy*, 10 (1), January 1988.

<sup>15</sup> Turnout in this example is actually the percent of black and white VAP voting for the highest statewide office on the ticket that included an African American candidate in the statewide Democratic primary – the race for Lieutenant Governor.

Equalizing the number of black and white voters who vote in an election would only be necessary to ensure that minority voters had the opportunity to elect their candidates of choice if white voters are rarely willing to vote for black-preferred candidates. If a sufficient percentage of white voters, consistently demonstrate a willingness to support black-preferred candidates, then the number of black voters need not equal the number of white voters who vote in a given election – white voters will “crossover” and help elect the black-preferred candidates. A district-specific, functional analysis should take into account not only differences in the turnout rates of black and white voters, but also the voting patterns of white and black voters.<sup>16</sup>

### **B. Incorporating Minority Cohesion and White Crossover Voting**

Estimates of voting patterns by race for of the elections analyzed for this report indicate that many were not racially polarized – black voters and white voters supported the same candidates. When black and white voters support different candidates, however, close attention must be paid not only to the turnout rates of black and white voters, but to the percentage of white voters who are willing to support black-preferred candidates, as well as how cohesive black voters are in their support of these candidates. When there are very high levels of minority cohesion and consistent, sufficient white crossover voting, the district need not be majority black in composition to provide black voters with a realistic opportunity to elect their candidates of choice to office.

To illustrate this mathematically, consider a district that has 2000 persons of voting age, 50% of whom are black and 50% of whom are white. Using the estimates of black and white turnout and support for the black-preferred candidate in the 2016 general election in Alamance County for Lieutenant Governor, black turnout is lower than white turnout: 44.7% of blacks of voting age and 70.6% of whites of voting age turned out to vote. (See Table 3, below.) This means that, for our illustrative election, there will be 447 black voters and 706 white voters. As indicated by Table 3, 99.3% of the black voters supported the black-preferred candidate (Linda

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<sup>16</sup> For an in-depth discussion of this approach to creating effective minority districts, see Bernard Grofman, Lisa Handley and David Lublin, “Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence,” *North Carolina Law Review*, volume 79 (5), June 2001.



Coleman) and 31.2% of the white voters supported her in this election.<sup>17</sup> Thus, in our example, black voters will cast 444 of their 447 votes for the black-preferred candidate and their other 3 votes for the other candidates; white voters will cast 220 of their 706 votes for the black-preferred candidate and 486 votes for the other candidates. The black-preferred candidate will receive 57.6% of the vote under these conditions:

<b>Black and White Voters</b>	<b>Votes for Black-Preferred Candidate</b>	<b>Votes for Other Candidates</b>
Black 1000 x .447 = 447	447 x .993 = 444	447 x .007 = 3
White 1000 x .706 = <u>706</u>	706 x .312 = <u>220</u>	706 x .688 = <u>486</u>
1153	664	486

The black-preferred candidate will garner a total of 664 votes (444 from black voters and 220 from white voters), while the other candidates will receive 486 votes (3 from black voters and 486 from white voters). The black-preferred candidate will win the election with 664 of the 1153 votes cast in the contest, or 57.6% of the vote in this hypothetical 50% black VAP district. The black-preferred candidate in this election actually received only 40.5% of the vote in Alamance County because the county is slightly less than 19% black in VAP. But as the column labeled “percent of vote B-P cand would have received if district was 50% black VAP” indicates, Coleman would have received 57.6% of the vote if the BVAP was 50%. And, as the last column in Table 3 indicates, in a district with at least 37.6% BVAP, the black-preferred candidate would win.<sup>18</sup>

The Democratic primary for Lieutenant Governor in 2016 in Alamance was not racially polarized. (There were 4 candidates and thus, while Coleman received only 43% of the white vote, she was the top choice of white voters; she received 87% of the black votes cast.) However, the 2016 Democratic primary race for Attorney General was polarized in the county so this will serve as the basis for the illustrative example. (See Table 3, below.) The turnout rate for

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<sup>17</sup> The 2016 general election for Lieutenant Governor included three candidates: Dan Forest, a white Republican, Linda Coleman, an African-American Democrat, and Libertarian candidate Jacki Cole. Dan Forest won the election with 51.8% of the statewide vote.

<sup>18</sup>

<b>Black and White Voters</b>	<b>Votes for Black-Preferred Candidate</b>	<b>Votes for Other Candidates</b>
Black 376 x .447 = 168	168 x .993 = 167	168 x .007 = 1
White 624 x .706 = <u>441</u>	441 x .312 = <u>138</u>	441 x .688 = <u>303</u>
609	305	304

blacks was 14.4%; for whites it was 8.4%. Marcus Williams, the African American candidate, received 99.4% of the black vote and 39.0% of the white vote. However, because black turnout was so much higher than white turnout (many white voters cast ballots in the Republican primary rather than the Democratic primary), Williams would have received over 77% of the vote (176 out of 228 votes) in a 50% BVAP district:

	<b>Black and White Voters</b>	<b>Black-Preferred Candidate Votes</b>	<b>White-Preferred Candidate Votes</b>
Black	1000 x .144 = 144	144 x .994 = 143	144 x .006 = 1
White	1000 x .084 = <u>84</u>	84 x .390 = <u>33</u>	84 x .610 = <u>67</u>
	228	176	52

Williams carried Alamance County, which has a 18.9% BVAP, with 51.1% of the vote and would have won the primary in any district with at least 11.5% BVAP under these conditions.

## VII. Results of Analysis

Tables 3 through 22 report the results of my racial bloc voting analysis and, if the contest is racially polarized, indicate the percentage of vote a black-preferred candidate would receive in each House and Senate grouping of interest, given the turnout rates of blacks and whites and the degree of black cohesion and white crossover voting for each election, in a 50%, 45%, 40% and 35% black VAP district. Each table considers a different state House county grouping (Tables 3-15) or state Senate county grouping (Tables 16-19). In each table, the first column indicates the relevant election, the second column indicates either the BVAP of the House or Senate district (for state legislative elections) or the BVAP of the entire counties that comprise the county grouping (for the statewide elections analyzed). The third and fourth columns then reflect the race and share of the vote received by the candidate of choice of African Americans.

Of significance, the column with the headers “black voters: B-P” and “white voters: B-P” represent my calculations of the share of black voters and white voters who supported the black-preferred candidate (i.e. the “B-P” candidate) in that election. If the numbers in these columns are both greater than 50%, it means that voting in that particular election was not racially polarized because a majority of blacks and whites both supported the candidate of choice of

African Americans. The final column calculates that percent BVAP needed for the black-preferred candidate to have won the election if that election was racially polarized.<sup>19</sup>

In addition to analyzing polarized voting across each of the county groupings at issue, I also analyzed racially polarized voting within specific individual counties, including Forsyth County (Table 20) and Pitt County (Table 21). Moreover, I conducted a racial polarization analysis for Robeson County, but for Native Americans rather than African Americans (Table 22). For this analysis, I divided all voters into Native Americans and non-Native Americans and then analyzed whether and to what extent voting was polarized between these two groups.

### **VIII. Conclusion**

My analysis of voting patterns by race in recent statewide and state legislative contests in select North Carolina state House and Senate county groupings indicates that a number of election contests were not racially polarized. When the election contest was polarized, I used the estimates of black and white turnout, and black and white votes for the black-preferred candidate to calculate the percent BVAP required for black voters to elect their preferred candidate in that election. The black percentage needed varies both by grouping – hence the importance of conducting a district-specific analysis – and the contest considered. In some county groupings such as Guilford, Cumberland, Forsyth-Yadkin, and Mecklenburg in the House, as well as Franklin-Wake, Davie-Forsyth, and Mecklenburg in the Senate, there are many elections that were not racially polarized because a majority of whites supported the candidate of choice of African Americans. Substantially greater white bloc voting was found in other county groupings.

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<sup>19</sup>The column titled “actual vote of B-P candidate” represent the raw percentage of the vote received by that candidate as reported by the State Board of Elections, and not the share of the two-party vote.

Table 3

House Grouping: Alamance	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates							percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes								
				votes cast for office	B-P	all others	votes cast for office	B-P	all others						
<b>General elections</b>															
<b>2018</b>															
State House 64	18.5	AA	42.2	24.5	96.7	3.3	55.7	38.2	61.8	56.1	53.7	51.5	49.4	36.5	
<b>2016</b>															
2016 Lt Governor	18.9	AA	40.5	44.7	99.3	0.7	70.6	31.2	68.8	57.6	54.4	51.4	48.5	37.6	
2016 Treasurer	18.9	AA	43.2	43.2	99.9	0.1	68.1	34.5	65.5	59.9	56.8	53.9	51.2	32.9	
<b>2014</b>															
none															
<b>2012</b>															
2012 President	18.9	AA	42.7	46.0	99.5	0.5	67.4	33.1	66.9	60.0	56.9	53.9	50.9	33.3	
2012 Lt Governor	18.9	AA	43.3	45.3	99.9	0.1	65.2	33.9	66.1	61.0	57.8	54.8	51.9	31.7	
<b>Democratic primaries</b>															
<b>2018</b>															
State House 64	18.5	AA	46.8	5.4	87.8	12.2	3.5	35.9	64.1	67.4	64.9	62.2	59.5	19.5	
<b>2016</b>															
2016 Lt Governor	18.9	AA	52.3	14.9	87.0	13.0	8.3	43.0	57.0	71.3	69.2	67.0	64.6	not polarized, 1st choice same	
2016 Attn General	18.9	AA	51.1	14.4	99.4	0.6	8.4	39.0	61.0	77.1	74.3	71.2	68.0	11.5	
2016 Comm of Labor	18.9	AA	50.3	14.1	83.6	16.4	8.4	40.7	59.3	67.6	65.5	63.4	61.1	14.2	
2016 Treasurer	18.9	AA	57.4	14.7	60.2	39.8	8.4	54.7	45.3	58.2	57.9	57.7	57.4	not polarized	
<b>2014</b>															
none															
<b>2012</b>															
2012 Lt Governor	18.9	AA	49.2	10.3	52.8	47.2	9.7	48.6	51.4	50.8	50.6	50.3	50.1	32.0	
2012 Comm of Labor	18.9	AA	33.5	10.3	58.6	41.4	9.1	26.5	73.5	43.5	41.9	40.3	38.7	70.7	

Table 4

House Grouping: Anson and Union	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	16.5	AA	32.2	55.8	100.0	0.0	75.1	23.1	76.9	55.9	52.2	48.6	45.1	42.0
2016 Treasurer	16.5	AA	34.6	54.6	99.6	0.4	73.4	27.3	72.7	58.1	54.7	51.3	48.0	38.1
<b>2014</b>														
none														
<b>2012</b>														
2012 President	16.5	AA	37.4	34.7	98.3	1.7	70.6	30.0	70.0	52.5	49.6	46.9	44.3	45.7
2012 Lt Governor	16.5	AA	39.1	33.3	99.0	1.0	68.0	32.0	68.0	54.0	51.2	48.5	46.0	42.9
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	16.5	AA	40.8	23.0	87.4	12.6	6.2	10.6	89.4	71.1	68.4	65.3	61.8	22.1
2016 Attn General	16.5	AA	58.3	21.3	92.7	7.3	6.1	48.1	51.9	82.8	81.1	79.3	77.2	1.3
2016 Comm of Labor	16.5	AA	55.3	22.9	63.5	36.5	5.9	49.7	50.3	60.7	60.2	59.7	59.0	0.6
2016 Treasurer	16.5	AA	56.5	19.4	84.3	15.7	5.9	47.6	52.4	75.7	74.4	72.8	71.1	2.1
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	16.5	AA	47.2	25.0	63.2	36.8	4.6	34.7	65.3	58.8	58.0	57.0	55.9	17.6
2012 Comm of Labor	16.5	AA	37.2	25.0	51.7	48.3	4.1	26.9	73.1	48.2	47.6	46.8	45.9	69.0

Table 5

House Grouping: Cabarrus, Davie, Montgomery, Richmond, Rowan, and Stanly	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 82	14.1	AA	47.3	34.8	99.9	0.1	64.2	38.9	61.1	60.3	57.6	55.1	52.7	29.1
<b>2016</b>														
2016 Lt Governor	15.5	AA	32.9	34.7	100.0	0.0	67.7	26.7	73.3	51.5	48.4	45.4	42.6	47.6
2016 Treasurer	15.5	AA	36.1	36.1	99.5	0.5	65.7	29.2	70.8	54.1	51.0	48.0	45.3	43.3
<b>2014</b>														
none														
<b>2012</b>														
2012 President	15.5	AA	37.6	58.9	99.6	0.4	62.4	28.1	71.9	62.8	59.3	55.7	52.2	31.9
2012 Lt Governor	15.5	AA	39.1	55.0	97.8	2.2	60.3	30.6	69.4	62.7	59.3	56.0	52.7	30.8
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	15.5	AA	45.2	14.7	73.4	26.6	6.0	37.6	62.4	63.0	61.5	59.8	58.0	17.8
2016 Attn General	15.5	AA	55.5	14.0	87.9	12.1	5.8	46.6	53.4	75.8	74.0	72.1	69.9	3.6
2016 Comm of Labor	15.5	AA	53.6	12.5	78.2	21.8	5.7	45.8	54.2	68.1	66.6	65.0	63.3	6.4
2016 Treasurer	15.5	AA	53.6	12.2	74.5	25.5	5.8	48.8	51.2	66.2	65.1	63.8	62.4	2.3
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	15.5	AA	55.0	22.4	55.1	44.9	7.0	56.0	44.0	55.3	55.3	55.4	55.4	not polarized
2012 Comm of Labor	15.5	AA	34.0	20.2	51.6	48.4	7.0	29.2	70.8	45.8	44.9	43.9	42.8	81.8

Table 6

House Grouping: Cleveland and Gaston	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 110	15.3	AA	32.2	29.5	95.7	4.3	52.7	27.8	72.2	52.2	49.1	46.3	43.5	46.5
State Senate 43	14.8	AA	33.8	20.8	100.0	0.0	29.8	26.4	73.6	56.7	53.2	49.8	46.5	40.3
<b>2016</b>														
2016 Lt Governor	16.2	AA	31.8	37.1	99.6	0.4	63.9	23.1	76.9	51.2	47.7	44.4	41.3	48.3
2016 Treasurer	16.2	AA	36.0	37.2	99.6	0.4	61.8	27.0	73.0	54.3	51.0	47.8	44.8	43.5
<b>2014</b>														
none														
<b>2012</b>														
2012 President	16.2	AA	37.6	45.7	99.8	0.2	59.7	28.1	71.9	59.2	55.7	52.3	49.0	36.5
2012 Lt Governor	16.2	AA	39.1	43.7	100.0	0.0	57.9	30.0	70.0	60.1	56.7	53.4	50.2	34.6
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	16.2	AA	44.4	17.7	81.4	18.6	4.5	23.5	76.5	69.7	67.7	65.4	62.8	17.7
2016 Attn General	16.2	AA	57.5	17.7	95.5	4.5	4.4	29.6	70.4	82.4	80.1	77.6	74.7	10.0
2016 Comm of Labor	16.2	AA	53.8	17.3	64.3	35.7	4.3	49.7	50.3	61.4	60.9	60.3	59.7	0.5
2016 Treasurer	16.2	AA	52.6	17.3	59.5	40.5	4.4	47.2	52.8	57.0	56.6	56.1	55.6	7.0
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	16.2	AA	59.0	13.6	55.1	44.9	7.5	58.8	41.2	56.4	56.6	56.8	57.0	not polarized
2012 Comm of Labor	16.2	AA	32.0	12.8	40.8	59.2	7.0	31.3	68.7	37.4	37.0	36.5	36.0	no clear B-P cand

Table 7

House Grouping: Columbus, Pender and Robeson	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 46	24.7	AA	36.7	27.0	82.3	17.7	36.3	26.3	73.7	50.2	47.5	44.9	42.3	49.7
State Senate 13	26.4	AA	37.5	30.5	88.3	11.7	34.7	20.8	79.2	52.4	49.0	45.7	42.5	46.4
<b>2016</b>														
2016 Lt Governor	24.5	AA	43.0	48.4	92.4	7.6	47.5	28.0	72.0	60.5	57.3	54.1	50.8	33.7
2016 Treasurer	24.5	AA	47.0	45.8	94.1	5.9	47.1	33.9	66.1	63.6	60.6	57.6	54.6	27.3
<b>2014</b>														
none														
<b>2012</b>														
2012 President	24.5	AA	49.9	63.9	93.8	6.2	46.3	36.6	63.4	69.8	66.9	64.0	61.0	18.1
2012 Lt Governor	24.5	AA	57.4	61.8	99.6	0.4	44.7	46.0	54.0	77.1	74.4	71.7	68.9	5.5
<b>Democratic primaries</b>														
<b>2018</b>														
State Senate 13	26.4	AA	69.2	11.3	94.4	5.6	5.4	52.3	47.7	80.8	78.9	76.8	74.6	not polarized
<b>2016</b>														
2016 Lt Governor	24.5	AA	41.5	12.8	59.8	40.2	8.7	31.5	68.5	48.3	47.0	45.5	44.0	56.2
2016 Attn General	24.5	AA	60.1	12.7	86.3	13.7	8.8	46.5	53.5	70.0	68.0	66.0	63.9	6.3
2016 Comm of Labor	24.5	AA	38.5	12.9	51.6	48.4	8.7	32.6	67.4	43.9	43.0	42.0	41.0	88.0
2016 Treasurer	24.5	AA	64.8	12.9	81.5	18.5	8.7	52.7	47.3	69.9	68.5	67.0	65.5	not polarized
<b>2014</b>														
State Senate 13	26.4	AA	27.3	20.3	46.5	53.5	12.8	19.3	80.7	36.0	34.7	33.3	31.8	4 cand, no clear B-P cand
<b>2012</b>														
Lt Governor	24.5	AA	50.5	25.6	54.5	45.5	12.0	50.2	49.8	53.1	52.9	52.7	52.5	not polarized
Comm of Labor	24.5	AA	27.9	21.6	39.7	60.3	11.5	26.8	73.2	35.2	34.6	34.0	33.3	no clear B-P cand



Table 8A

House Grouping: Cumberland	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates							percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes								
				votes cast for office	B-P	all others	votes cast for office	B-P	all others						
<b>General elections</b>															
<b>2018</b>															
State House 42	42.2	AA	76.1	40.2	100.0	0.0	37.8	56.8	43.2	79.1	76.9	74.7	72.5	not polarized	
State House 43	50.0	AA	74.1	36.4	99.3	0.7	36.8	50.1	49.9	74.6	72.1	69.7	67.2	not polarized	
<b>2016</b>															
2016 Lt Governor	37.1	AA	55.8	47.3	99.5	0.5	60.2	32.7	67.3	62.1	58.8	55.7	52.6	30.8	
2016 Treasurer	37.1	AA	58.0	47.3	99.9	0.1	58.9	36.6	63.4	64.8	61.7	58.7	55.7	25.1	
State Senate 19	22.5	AA	43.6	48.3	83.8	16.2	57.4	29.4	70.6	54.3	51.6	49.0	46.4	42.0	
<b>2014</b>															
none															
<b>2012</b>															
2012 President	37.1	AA	59.5	55.7	99.9	0.1	55.8	39.7	60.3	69.8	66.8	63.8	60.7	17.1	
2012 Lt Governor	37.1	AA	61.6	55.5	99.6	0.4	54.3	42.4	57.6	71.3	68.4	65.6	62.7	13.0	

Table 8B

House Grouping: Cumberland	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 43	50	AA	79.2	7.3	94.4	5.6	6.8	65.0	35.0	80.2	78.7	77.3	75.8	not polarized
<b>2016</b>														
2016 Lt Governor	37.1	AA	59.1	15.4	72.1	27.9	9.9	48.6	51.4	62.9	61.8	60.6	59.3	not polarized, 1st choice same
2016 Attn General	37.1	AA	66.7	15.3	90.7	9.3	9.8	43.2	56.8	72.2	69.8	67.4	64.9	9.7
2016 Comm of Labor	37.1	AA	46.0	15.4	63.1	36.9	9.8	34.8	65.2	52.1	50.7	49.3	47.8	42.5
2016 Treasurer	37.1	AA	52.3	15.3	74.5	25.5	11.0	39.2	60.8	59.7	58.0	56.2	54.3	24.1
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	37.1	AA	70.7	11.9	73.5	26.5	12.8	68.5	31.5	70.9	70.7	70.4	70.2	not polarized
2012 Comm of Labor	37.1	AA	42.8	11.5	43.7	56.3	10.0	42.2	57.8	43.0	42.9	42.9	42.8	not polarized, 1st choice same

Table 9

House Grouping: Duplin and Onslow	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 4	22.6	AA	34.9	29.7	99.0	1.0	34.1	15.1	84.9	54.2	50.0	45.9	41.9	45.0
<b>2016</b>														
2016 Lt Governor	18.5	AA	33.5	32.4	99.2	0.8	53.3	18.0	82.0	48.7	45.0	41.4	38.0	51.7
2016 Treasurer	18.5	AA	35.7	32.1	99.6	0.4	51.2	21.1	78.9	51.4	47.7	44.2	40.9	48.2
<b>2014</b>														
none														
<b>2012</b>														
2012 President	18.5	AA	38.3	47.6	98.7	1.3	47.0	22.7	77.3	60.9	57.1	53.3	49.5	35.6
2012 Lt Governor	18.5	AA	41.9	46.1	97.3	2.7	44.9	28.0	72.0	63.1	59.6	56.2	52.7	31.2
<b>Democratic primaries</b>														
<b>2018</b>														
<b>2016</b>														
2016 Lt Governor	18.5	AA	46.7	11.1	91.4	8.6	4.9	32.5	67.5	73.4	70.8	67.9	64.9	15.7
2016 Attn General	18.5	AA	64.6	11.0	92.8	7.2	4.6	43.4	56.6	78.2	76.1	73.8	71.2	6.1
2016 Comm of Labor	18.5	AA	51.0	11.1	71.5	28.5	4.6	46.0	54.0	64.0	62.9	61.7	60.4	7.2
2016 Treasurer	18.5	AA	54.9	11.2	94.9	5.1	4.6	41.9	58.1	79.5	77.2	74.7	72.0	6.9
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	18.5	AA	52.2	19.3	59.9	40.1	4.8	47.6	52.4	57.5	57.0	56.6	56.0	5.7
2012 Comm of Labor	18.5	AA	24.8	18.9	39.8	60.2	4.2	28.5	71.5	37.7	37.4	37.0	36.5	no clear B-P cand

Table 10

House Grouping: Forsyth and Yadkin	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 71	36.6	AA	72.7	24.7	98.7	1.3	57.0	63.4	36.6	74.1	72.6	71.3	70.1	not polarized
State House 72	47.5	AA	79.1	31.8	99.6	0.4	49.4	69.6	30.4	81.3	79.9	78.6	77.3	not polarized
State Senate 32	39.2	AA	72.9	28.5	99.2	0.8	50.5	65.0	35.0	77.3	75.8	74.3	73.0	not polarized
<b>2016</b>														
2016 Lt Governor	23.6	AA	48.2	40.5	99.3	0.7	70.9	29.1	70.9	54.6	51.5	48.5	45.6	42.6
2016 Treasurer	23.6	AA	47.7	40.1	99.5	0.5	69.6	28.2	71.8	54.3	51.0	48.0	45.1	43.3
<b>2014</b>														
State House 71	45.5	AA	76.6	25.8	99.3	0.7	39.6	62.6	37.4	77.1	75.4	73.7	72.1	not polarized
<b>2012</b>														
2012 President	23.6	AA	50.6	48.9	98.8	1.2	47.0	32.7	67.3	66.4	63.1	59.8	56.4	25.4
2012 Lt Governor	23.6	AA	50.9	46.4	98.5	1.5	44.9	34.3	65.7	66.9	63.7	60.5	57.3	23.9
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	23.6	AA	55.6	14.6	81.3	18.7	11.4	44.3	55.7	65.1	63.2	61.3	59.4	not polarized, 1st choice same
2016 Attn General	23.6	AA	45.1	14.5	66.2	33.8	11.0	38.0	62.0	54.0	52.6	51.2	49.7	36.0
2016 Comm of Labor	23.6	AA	60.5	14.0	84.0	16.0	11.3	52.0	48.0	69.7	68.1	66.5	64.8	not polarized
2016 Treasurer	23.6	AA	59.1	14.6	71.1	28.9	10.5	53.2	46.8	63.6	62.7	61.8	60.9	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	23.6	AA	58.2	16.1	75.3	24.7	9.3	50.8	49.2	66.3	65.2	63.9	62.6	not polarized
2012 Comm of Labor	23.6	AA	38.9	15.1	51.6	48.4	8.9	33.5	66.5	44.9	44.0	43.1	42.1	85.9

Table 11

House Grouping: Franklin and Nash	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 25	40.7	AA	51.5	35.4	98.1	1.9	64.2	34.2	65.8	56.9	54.1	51.4	48.8	37.3
<b>2016</b>														
2016 Lt Governor	33.0	AA	46.5	51.3	99.9	0.1	70.5	24.0	76.0	56.0	52.3	48.8	45.4	41.7
2016 Treasurer	33.0	AA	48.7	53.5	100.0	0.0	68.3	26.8	73.2	59.0	55.4	51.9	48.5	37.2
State House 7	50.7	AA	67.8	52.9	99.5	0.5	68.3	44.8	55.2	68.7	66.0	63.4	60.9	11.9
State House 25	16.1	AA	31.9	53.8	84.6	15.4	62.8	20.8	79.2	50.2	47.1	44.0	40.9	49.6
<b>2014</b>														
none														
<b>2012</b>														
2012 President	33.0	AA	48.6	53.8	99.1	0.9	64.4	26.6	73.4	59.6	56.0	52.5	49.1	36.3
2012 Lt Governor	33.0	AA	51.2	52.5	99.1	0.9	62.8	30.3	69.7	61.6	58.2	54.9	51.7	32.4
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	33.0	AA	66.5	17.4	94.9	5.1	8.6	35.7	64.3	75.3	72.6	69.7	66.6	13.6
2016 Attn General	33.0	AA	39.5	17.9	63.1	36.9	8.1	29.5	70.5	52.6	51.1	49.5	47.8	41.5
2016 Comm of Labor	33.0	W	74.8	17.0	72.5	27.5	8.8	75.7	24.3	73.6	73.7	73.9	74.1	not polarized
2016 Treasurer	33.0	AA	65.1	17.7	88.0	12.0	8.7	37.4	62.6	71.3	69.0	66.5	63.9	14.0
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	33.0	AA	58.2	16.8	68.3	31.7	10.3	50.8	49.2	61.6	60.8	59.9	59.0	not polarized
2012 Comm of Labor	33.0	AA	36.2	16.0	50.8	49.2	9.7	19.1	80.9	38.8	37.3	35.7	34.0	95.9

Table 12A

House Grouping: Guildford	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates							percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes								
				votes cast for office	B-P	all others	votes cast for office	B-P	all others						
<b>General elections</b>															
<b>2018</b>															
State House 58	42.7	AA	76.8	38.0	99.4	0.6	47.8	62.8	37.2	79.0	77.2	75.5	73.8	not polarized	
State House 60	40.1	AA	69.0	35.2	98.9	1.1	52.5	57.1	42.9	73.9	71.9	70.0	68.2	not polarized	
State Senate 28	43.6	AA	75.3	34.9	99.2	0.8	58.0	64.5	35.5	77.5	75.9	74.4	73.0	not polarized	
<b>2016</b>															
2016 Lt Governor	32.1	AA	56.6	44.1	98.7	1.3	78.4	42.8	57.2	62.9	60.4	58.0	55.8	20.8	
2016 Treasurer	32.1	AA	57.6	42.1	99.3	0.7	76.9	44.9	55.1	64.1	61.7	59.4	57.3	15.9	
State Senate 28	56.5	AA	83.9	59.7	99.4	0.6	59.7	62.3	37.7	80.9	79.0	77.1	75.3	not polarized	
<b>2014</b>															
State House 61	15.3	AA	32.8	38.1	98.6	1.4	63.8	24.3	75.7	52.1	48.7	45.5	42.4	47.0	
<b>2012</b>															
2012 President	32.1	AA	57.8	49.6	99.9	0.1	76.4	43.7	56.3	65.8	63.2	60.7	58.3	16.3	
2012 Lt Governor	32.1	AA	58.0	47.3	100.0	0.0	74.0	44.3	55.7	66.0	63.4	60.9	58.6	15.1	

Table 12B

House Grouping: Guilford	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 58	42.7	AA	80.2	10.0	98.4	1.6	7.3	65.2	34.8	84.4	82.7	81.0	79.3	not polarized
<b>2016</b>														
2016 Lt Governor	32.1	AA	57.9	19.2	71.8	28.2	13.5	49.2	50.8	62.5	61.4	60.2	59.0	not polarized
2016 Attn General	32.1	AA	54.6	18.9	86.5	13.5	13.2	38.3	61.7	66.7	64.3	61.8	59.3	18.3
2016 Comm of Labor	32.1	AA	61.3	18.9	78.5	21.5	12.3	49.6	50.4	67.1	65.7	64.2	62.7	0.9
2016 Treasurer	32.1	AA	54.3	18.4	63.7	36.3	12.5	46.2	53.8	56.6	55.8	54.9	53.9	15.9
State House 58	51.1	AA	71.5	15.3	89.4	10.6	10.4	52.3	47.7	74.4	72.6	70.7	68.7	not polarized
<b>2014</b>														
State House 58	51.1	AA	42.6	12.2	59.4	40.6	7.2	16.8	83.2	43.6	41.5	39.4	37.1	67.6
State House 60	51.4	AA	54.2	9.9	66.5	33.5	4.9	32.7	67.3	55.3	53.8	52.1	50.3	34.2
State Senate 28	56.5	AA	59.4	12.1	71.4	34.1	6.0	34.7	65.3	57.1	55.6	54.0	52.3	28.9
<b>2012</b>														
2012 Lt Governor	32.1	AA	58.6	14.6	66.5	33.5	12.4	54.3	45.7	60.9	60.3	59.7	59.0	not polarized
2012 Comm of Labor	32.1	AA	39.2	13.7	52.6	47.4	10.6	30.9	69.1	43.1	42.1	40.9	39.8	85.0

Table 13

House Grouping: Lenoir and Pitt	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 8	44.9	AA	64.7	26.7	98.3	1.7	56.2	46.8	53.2	63.4	61.2	59.2	57.3	12.2
State House 9	20.5	AA	40.0	20.1	86.1	13.9	57.6	33.1	66.9	46.8	44.9	43.1	41.5	57.3
State House 12	37.4	AA	43.9	27.0	96.6	3.4	45.8	24.9	75.1	51.5	48.2	45.1	42.2	47.7
<b>2016</b>														
2016 Lt Governor	34.2	AA	50.2	39.4	97.9	2.1	65.1	42.8	57.2	63.6	61.0	58.6	56.3	19.9
2016 Treasurer	34.2	AA	52.6	38.8	98.6	1.4	63.2	44.9	55.1	65.3	62.9	60.5	58.2	14.6
<b>2014</b>														
none														
<b>2012</b>														
2012 President	34.2	AA	52.3	52.3	99.0	1.0	60.6	30.7	69.3	62.3	59.0	55.6	52.4	31.3
2012 Lt Governor	34.2	AA	52.9	51.6	98.6	1.4	59.3	32.0	68.0	63.0	59.7	56.5	53.2	29.9
<b>Democratic primaries</b>														
<b>2018</b>														
State House 8	44.9	AA	50.0	7.4	55.3	44.7	4.4	43.0	57.0	50.7	50.1	49.5	48.8	44.0
<b>2016</b>														
2016 Lt Governor	34.2	AA	53.6	17.2	73.7	26.3	7.8	34.2	65.8	61.4	59.6	57.7	55.6	23.2
2016 Attn General	34.2	AA	61.1	16.5	86.9	13.1	7.2	32.5	67.5	70.4	68.0	65.4	62.5	17.1
2016 Comm of Labor	34.2	W	46.5	16.7	55.6	44.4	7.7	38.0	62.0	50.0	49.3	48.4	47.5	49.7
2016 Treasurer	34.2	AA	54.6	16.5	53.6	46.4	7.2	52.7	47.3	53.3	53.3	53.2	53.2	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	34.2	AA	61.1	18.1	69.2	30.8	10.2	52.3	47.7	63.1	62.3	61.5	60.6	not polarized
2012 Comm of Labor	34.2	AA	29.9	18.0	35.2	64.8	9.5	26.1	73.9	32.1	31.6	31.2	30.7	no clear B-P cand



Table 14A

House Grouping: Mecklenburg	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 92	30.2	AA	70.0	26.4	98.3	1.7	65.5	63.2	36.8	73.3	71.9	70.6	69.5	not polarized
State House 99	49.5	AA	82.4	42.9	98.0	2.0	51.4	66.8	33.2	81.0	79.5	78.0	76.5	not polarized
State House 101	50.8	AA	78.7	34.5	98.5	1.5	62.4	61.3	38.7	74.5	72.9	71.3	69.8	not polarized
State House 104	6.2	AA	51.8	20.0	99.6	0.4	64.5	51.9	48.1	63.2	61.6	60.1	58.7	not polarized
State House 106	38.0	AA	80.6	28.1	99.0	1.0	55.8	72.6	27.4	81.4	80.3	79.2	78.2	not polarized
State Senate 40	38.9	AA	75.6	20.8	99.3	0.7	59.1	63.3	36.7	72.7	71.3	70.1	69.0	not polarized
<b>2016</b>														
2016 Lt Governor	30.2	AA	58.4	39.9	98.5	1.5	78.1	46.1	53.9	63.8	61.5	59.4	57.4	not polarized
2016 Treasurer	30.2	AA	58.4	42.2	99.0	1.0	74.6	47.9	52.1	66.4	64.1	61.9	59.8	7.0
State House 92	18.2	AA	54.4	39.8	96.1	3.9	56.6	45.2	54.8	66.2	63.8	61.4	59.2	12.9
State House 101	51.3	AA	76.0	50.7	99.2	0.8	69.1	53.6	46.4	72.9	70.7	68.6	66.5	not polarized
State House 105	9.5	AA	44.7	42.3	97.5	2.5	63.2	41.1	58.9	63.7	61.1	58.5	56.0	21.9
State Senate 38	52.5	AA	79.1	45.4	98.7	1.3	61.9	57.9	42.1	75.2	73.2	71.3	69.5	not polarized
State Senate 40	51.8	AA	82.5	53.8	98.5	1.5	42.6	56.1	43.9	79.8	77.6	75.5	73.3	not polarized
<b>2014</b>														
State House 92	18.2	AA	47.5	26.9	95.2	4.8	33.8	36.7	63.3	62.6	59.8	57.0	54.2	27.0
State House 106	51.1	AA	86.6	30.8	89.2	10.8	30.1	78.6	21.4	84.0	83.4	82.9	82.4	not polarized
State Senate 38	52.5	AA	79.7	31.6	99.2	0.8	35.2	60.4	39.6	78.8	76.8	74.9	73.0	not polarized
State Senate 41	13.2	AA	39.5	25.5	98.5	1.5	49.9	34.4	65.6	56.1	53.3	50.7	48.2	38.6
<b>2012</b>														
2012 President	30.2	AA	60.8	43.4	98.7	1.3	73.9	51.9	48.1	69.2	67.1	65.1	63.1	not polarized
2012 Lt Governor	30.2	AA	59.8	42.9	99.9	0.1	70.7	50.1	49.9	68.9	66.6	64.4	62.4	not polarized

Table 14B

House Grouping: Mecklenburg	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 99	49.5	AA	57.3	9.8	73.8	26.2	5.9	44.2	55.8	62.7	61.3	59.8	58.2	12.8
State House 101	50.8	AA	50.0	7.8	60.2	39.8	6.5	39.4	61.5	50.5	49.5	48.4	47.3	47.4
State House 106	38.0	AA	88.9	9.4	91.3	8.7	7.5	85.2	14.8	88.6	88.3	88.0	87.7	not polarized
State Senate 38	48.5	O	51.9	12.1	60.3	39.7	5.4	32.6	67.4	51.8	50.5	49.2	47.7	43.0
<b>2016</b>														
2016 Lt Governor	30.2	AA	55.2	19.8	65.2	34.8	11.0	48.6	51.4	59.3	58.5	57.7	56.8	not polarized
2016 Attn General	30.2	AA	55.7	19.6	86.6	13.4	10.9	31.8	68.2	67.0	64.4	61.7	58.8	21.7
2016 Comm of Labor	30.2	AA	57.0	16.9	75.7	24.3	11.2	46.8	53.2	64.2	62.8	61.3	59.8	7.6
2016 Treasurer	30.2	AA	52.7	19.0	59.6	40.4	10.7	47.1	52.9	55.1	54.5	53.9	53.2	14.5
State House 101	51.3	AA	78.6	14.1	92.5	7.5	9.1	50.3	49.7	75.9	73.9	71.7	69.5	not polarized
State House 107	52.5	AA	90.1	26.0	93.4	6.6	10.5	85.7	14.3	91.2	90.9	90.5	90.1	not polarized
State Senate 38	52.5	AA	52.1	18.9	54.3	45.7	13.1	48.6	51.4	52.0	51.7	51.4	51.1	18.4
State Senate 40	51.8	AA	64.7	19.3	66.7	33.3	9.1	63.2	36.8	65.6	65.4	65.3	65.1	not polarized
<b>2014</b>														
State Senate 40	51.8	AA	41.9	10.1	48.5	51.5	6.1	27.5	72.5	40.6	39.6	38.5	37.4	no clear B-P cand
<b>2012</b>														
2012 Lt Governor	30.2	AA	67.6	11.7	61.5	38.5	9.2	70.3	29.7	65.4	65.8	66.3	66.7	not polarized
2012 Comm of Labor	30.2	AA	40.7	11.7	54.3	45.7	7.2	30.5	69.5	45.2	44.1	42.9	41.6	73.6

Table 15A

House Grouping: Wake	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 33	44.2	AA	78.7	49.7	100.0	0.0	49.3	63.2	36.8	81.7	79.8	78.0	76.1	not polarized
State House 37	14.3	AA	49.9	30.4	99.2	0.8	67.3	46.7	53.3	63.0	60.9	58.9	57.0	12.9
State House 38	48.3	AA	81.9	31.5	99.1	0.9	65.4	69.4	30.6	79.1	77.8	76.6	75.5	not polarized
State Senate 14	38.9	AA	71.4	32.0	99.2	0.8	67.9	63.3	36.7	74.8	73.3	71.9	70.6	not polarized
<b>2016</b>														
2016 Lt Governor	20.7	AA	54.7	56.9	98.6	1.4	67.8	46.2	53.8	70.1	67.5	65.0	62.5	not polarized
2016 Treasurer	20.7	AA	56.1	61.1	99.2	0.8	65.3	48.3	51.7	72.9	70.4	67.9	65.4	3.6
State House 38	51.4	AA	84.8	42.1	96.9	3.1	50.9	73.8	26.2	84.3	83.1	82.0	80.9	not polarized
<b>2014</b>														
State House 33	51.4	AA	87.3	37.0	99.3	0.7	50.0	75.4	24.6	85.6	84.4	83.3	82.2	not polarized
State Senate 38	51.4	AA	79.9	43.9	99.1	0.9	43.2	66.5	33.5	82.9	81.3	79.7	78.0	not polarized
<b>2012</b>														
2012 President	20.7	AA	55.1	41.6	99.3	0.7	70.7	47.0	53.0	66.4	64.0	61.7	59.6	9.4
2012 Lt Governor	20.7	AA	55.3	39.8	99.7	0.3	68.7	47.3	52.7	66.5	64.2	61.9	59.8	8.6

Table 15B

House Grouping: Wake	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 33	44.2	AA	60.2	11.7	61.8	38.2	8.4	58.9	41.1	60.6	60.4	60.3	60.1	not polarized
<b>2016</b>														
2016 Lt Governor	20.7	AA	60.3	22.4	82.2	17.8	17.8	51.4	48.6	68.6	67.0	65.5	63.8	not polarized
2016 Attn General	20.7	AA	35.0	22.0	60.4	39.6	17.8	28.4	71.6	46.1	44.5	42.9	41.2	62.7
2016 Comm of Labor	20.7	W	72.2	18.8	72.1	27.9	21.9	74.7	25.3	73.5	73.6	73.8	73.9	not polarized
2016 Treasurer	20.7	AA	63.2	19.9	89.2	10.8	20.7	52.9	47.1	70.7	68.9	67.1	65.3	not polarized
State House 33	51.4	AA	64.1	18.5	80.6	19.4	17.7	54.3	45.7	67.7	66.4	65.1	63.8	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	20.7	AA	59.7	19.4	68.0	32.0	16.6	53.7	46.3	61.4	60.7	60.0	59.2	not polarized
2012 Comm of Labor	20.7	AA	37.9	19.2	54.1	45.9	13.6	31.3	68.7	44.6	43.5	42.4	41.1	76.4

Table 16A

Senate Grouping: Alamance, Guilford, and Randolph	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 64 (Alamance)	18.5	AA	42.2	24.5	96.7	3.3	55.7	38.2	61.8	56.1	53.7	51.5	49.4	36.5
State House 58 (Guilford)	42.7	AA	76.8	38.0	99.4	0.6	47.8	62.8	37.2	79.0	77.2	75.5	73.8	not polarized
State House 60 (Guilford)	40.1	AA	69.0	35.2	98.9	1.1	52.5	57.1	42.9	73.9	71.9	70.0	68.2	not polarized
State Senate 28 (Guilford)	43.6	AA	75.3	34.9	99.2	0.8	58.0	64.5	35.5	77.5	75.9	74.4	73.0	not polarized
<i>insert</i>														
<b>2016</b>														
2016 Lt Governor	24.8	AA	47.8	43.6	96.6	3.4	72.2	38.1	61.9	60.1	57.4	54.9	52.5	29.7
2016 Treasurer	24.8	AA	49.2	43.8	99.5	0.5	70.1	42.3	57.7	64.3	61.6	59.1	56.7	19.9
State Senate 28 (Guilford)	56.5	AA	83.9	59.7	99.4	0.6	59.7	62.3	37.7	80.9	79.0	77.1	75.3	not polarized
<b>2014</b>														
State House 61 (Guilford)	15.3	AA	32.8	38.1	98.6	1.4	63.8	24.3	75.7	52.1	48.7	45.5	42.4	47.0
<b>2012</b>														
2012 President	24.8	AA	49.8	45.0	99.2	0.8	67.8	40.0	60.0	63.6	60.8	58.2	55.6	23.4
2012 Lt Governor	24.8	AA	50.2	43.5	98.4	1.6	66.9	43.5	56.5	65.1	62.6	60.1	57.7	17.1

Table 16B

Senate Grouping: Alamance, Guilford, and Randolph	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 64 (Alamance)	18.5	AA	46.8	5.4	87.8	12.2	3.5	35.9	64.1	67.4	64.9	62.2	59.5	19.5
State House 58 (Guilford)	42.7	AA	80.2	10.0	98.4	1.6	7.3	65.2	34.8	84.4	82.7	81.0	79.3	not polarized
<b>2016</b>														
2016 Lt Governor	24.8	AA	56.0	21.2	74.6	25.4	11.2	47.0	53.0	65.1	63.8	62.4	60.9	not polarized
2016 Attn General	24.8	AA	53.1	20.9	87.9	12.1	10.9	38.5	61.5	71.0	68.7	66.2	63.6	13.7
2016 Comm of Labor	24.8	W	58.8	20.6	79.5	20.5	10.3	49.5	50.5	69.5	68.1	66.6	65.1	0.8
2016 Treasurer	24.8	AA	54.2	20.5	61.3	38.7	10.5	54.3	45.7	58.9	58.6	58.3	57.9	not polarized
State House 58 (Guilford)	51.1	AA	71.5	15.3	89.4	10.6	10.4	52.3	47.7	74.4	72.6	70.7	68.7	not polarized
<b>2014</b>														
State House 58 (Guilford)	51.1	AA	42.6	12.2	59.4	40.6	7.2	16.8	83.2	43.6	41.5	39.4	37.1	67.6
State House 60 (Guilford)	51.4	AA	54.2	9.9	66.5	33.5	4.9	32.7	67.3	55.3	53.8	52.1	50.3	34.2
State Senate 28 (Guilford)	56.5	AA	59.4	12.1	71.4	34.1	6.0	34.7	65.3	57.1	55.6	54.0	52.3	28.9
<b>2012</b>														
2012 Lt Governor	24.8	AA	56.7	16.9	66.7	33.3	9.8	52.1	47.9	61.3	60.6	59.9	59.1	not polarized
2012 Comm of Labor	24.8	AA	36.8	15.7	54.4	45.6	8.4	27.8	72.2	45.1	43.9	42.6	41.1	73.0

Table 17

Senate Grouping: Davie and Forsyth	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 71 (Forsyth)	36.6	AA	72.7	24.7	98.7	1.3	57.0	63.4	36.6	74.1	72.6	71.3	70.1	not polarized
State House 72 (Forsyth)	47.5	AA	79.1	31.8	99.6	0.4	49.4	69.6	30.4	81.3	79.9	78.6	77.3	not polarized
State Senate 32 (Forsyth)	39.2	AA	72.9	28.5	99.2	0.8	50.5	65.0	35.0	77.3	75.8	74.3	73.0	not polarized
<b>2016</b>														
2016 Lt Governor	23.8	AA	48.2	32.6	99.4	0.6	72.9	34.8	65.2	54.8	52.1	49.6	47.3	40.8
2016 Treasurer	23.8	AA	41.2	29.9	100.0	0.0	71.2	34.3	65.7	53.7	51.1	48.7	46.4	42.8
<b>2014</b>														
State House 71	45.5	AA	76.6	25.8	99.3	0.7	39.6	62.6	37.4	77.1	75.4	73.7	72.1	not polarized
<b>2012</b>														
2012 President	23.8	AA	50.5	47.8	99.3	0.7	69.8	40.6	59.4	64.5	61.7	59.0	56.4	21.8
2012 Lt Governor	23.8	AA	50.7	46.4	99.1	0.9	69.5	42.3	57.7	65.0	62.4	59.8	57.3	19.0
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	23.8	AA	55.6	20.0	79.9	20.1	11.4	45.2	54.8	67.3	65.7	63.9	62.1	not polarized, 1st choice same
2016 Attn General	23.8	AA	45.0	20.9	68.9	31.1	11.1	36.3	63.7	57.6	56.1	54.4	52.7	27.8
2016 Comm of Labor	23.8	AA	60.3	19.1	84.7	15.3	10.6	51.2	48.8	72.7	71.2	69.5	67.7	not polarized
2016 Treasurer	23.8	AA	59.1	20.5	70.5	29.5	10.6	53.6	46.4	64.7	64.0	63.1	62.2	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	23.8	AA	58.5	16.1	76.5	23.5	10.4	51.8	48.2	66.8	65.6	64.3	63.0	not polarized
2012 Comm of Labor	23.8	AA	39.3	15.1	47.9	52.1	8.9	35.8	64.2	43.4	42.8	42.2	41.6	no clear B-P cand

Table 18A

Senate Grouping: Duplin, Harnett, Johnson, Lee, Nash, and Sampson	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 4 (Duplin)	22.6	AA	34.5	29.7	99.0	1.0	34.1	15.1	84.9	54.2	50.0	45.9	41.9	45.0
State House 25 (Nash)	40.7	AA	51.5	35.4	98.1	1.9	64.2	34.2	65.8	56.9	54.1	51.4	48.8	37.3
State Senate 10	24.1	AA	37.5	30.7	99.8	0.2	33.2	16.6	83.4	56.6	52.4	48.3	44.3	42.0
<b>2016</b>														
2016 Lt Governor	23.3	AA	38.7	55.9	99.8	0.2	60.1	21.1	78.9	59.0	55.1	51.2	47.4	38.4
2016 Treasurer	23.3	AA	41.5	54.8	99.8	0.2	58.4	29.7	70.3	63.6	60.1	56.7	53.2	30.3
State House 7 (Nash)	50.7	AA	67.8	52.9	99.5	0.5	68.3	44.8	55.2	68.7	66.0	63.4	60.9	11.9
State House 25 (Nash)	16.1	AA	31.9	53.8	84.6	15.4	62.8	20.8	79.2	50.2	47.1	44.0	40.9	49.6
<b>2014</b>														
none														
<b>2012</b>														
2012 President	23.3	AA	41.8	58.3	99.2	0.8	64.7	23.9	76.1	59.6	55.9	52.2	48.5	37.1
2012 Lt Governor	23.3	AA	44.8	57.1	99.1	0.9	63.6	28.4	71.6	61.8	58.3	54.9	51.4	32.9



Table 18B

Senate Grouping: Duplin, Harnett, Johnson, Lee, Nash, and Sampson	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	23.3	AA	57.8	19.0	94.1	5.9	6.5	40.2	59.8	80.4	78.2	75.8	73.2	7.1
2016 Attn General	23.3	AA	49.3	18.9	64.5	35.5	7.0	42.3	57.7	58.5	57.6	56.6	55.5	16.4
2016 Comm of Labor	23.3	W	67.7	18.6	64.9	35.1	6.6	69.3	30.7	66.1	66.2	66.4	66.6	not polarized
2016 Treasurer	23.3	AA	60.1	18.8	82.7	17.3	6.6	48.4	51.6	73.8	72.4	70.9	69.2	1.7
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	23.3	AA	51.3	24.9	56.4	43.6	7.9	56.2	43.8	56.4	56.3	56.3	56.3	not polarized
2012 Comm of Labor	23.3	AA	16.9	23.9	38.5	61.5	6.9	18.4	81.6	34.0	33.3	32.4	31.5	no clear B-P cand

Table 19A

Senate Grouping: Franklin and Wake	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 33 (Wake)	44.2	AA	78.7	49.7	100.0	0.0	49.3	63.2	36.8	81.7	79.8	78.0	76.1	not polarized
State House 37 (Wake)	14.3	AA	49.9	30.4	99.2	0.8	67.3	46.7	53.3	63.0	60.9	58.9	57.0	12.9
State House 38 (Wake)	48.3	AA	81.9	31.5	99.1	0.9	65.4	69.4	30.6	79.1	77.8	76.6	75.5	not polarized
State Senate 14 (Wake)	38.9	AA	71.4	32.0	99.2	0.8	67.9	63.3	36.7	74.8	73.3	71.9	70.6	not polarized
<b>2016</b>														
2016 Lt Governor	21.1	AA	54.0	58.3	99.6	0.4	85.8	44.1	55.9	66.6	63.9	61.4	59.0	14.9
2016 Treasurer	21.1	AA	55.4	57.3	99.5	0.5	84.3	46.4	53.6	67.9	65.4	63.0	60.6	9.7
State House 7 (Franklin)	50.7	AA	67.8	52.9	99.5	0.5	68.3	44.8	55.2	68.7	66.0	63.4	60.9	11.9
State House 38 (Wake)	51.4	AA	84.8	42.1	96.9	3.1	50.9	73.8	26.2	84.3	83.1	82.0	80.9	not polarized
<b>2014</b>														
State House 33 (Wake)	51.4	AA	87.3	37.0	99.3	0.7	50.0	75.4	24.6	85.6	84.4	83.3	82.2	not polarized
State Senate 38 (Wake)	51.4	AA	79.9	43.9	99.1	0.9	43.2	66.5	33.5	82.9	81.3	79.7	78.0	not polarized
<b>2012</b>														
2012 President	21.1	AA	54.7	54.7	99.5	0.5	68.3	42.1	57.9	67.6	64.8	62.1	59.4	16.6
2012 Lt Governor	21.1	AA	54.9	53.6	99.3	0.7	67.1	44.0	56.0	68.6	65.9	63.2	60.6	13.2

Table 19B

Senate Grouping: Franklin and Wake	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State House 33	44.2	AA	60.2	11.7	61.8	38.2	8.4	58.9	41.1	60.6	60.4	60.3	60.1	not polarized
<b>2016</b>														
2016 Lt Governor	21.1	AA	60.7	17.6	84.7	15.3	13.3	51.3	48.7	70.3	68.7	67.0	65.2	not polarized
2016 Attn General	21.1	AA	35.4	17.0	63.2	15.4	13.0	32.4	67.6	56.7	54.3	51.9	49.5	36.0
2016 Comm of Labor	21.1	W	72.2	17.0	68.6	31.4	11.6	74.7	25.3	71.1	71.4	71.7	72.0	not polarized
2016 Treasurer	21.1	AA	63.4	17.3	90.0	10.0	12.4	53.5	46.5	74.8	73.0	71.1	69.2	not polarized
State House 33	51.4	AA	64.1	18.5	80.6	19.4	17.7	54.3	45.7	67.7	66.4	65.1	63.8	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	21.1	AA	59.8	19.4	77.0	23.0	16.6	54.9	45.1	66.8	65.7	64.6	63.4	not polarized
2012 Comm of Labor	21.1	AA	37.7	19.2	56.1	43.9	13.6	31.3	68.7	45.8	44.6	43.3	42.0	68.5

Table 20

Forsyth County	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 71	36.6	AA	72.7	24.7	98.7	1.3	57.0	63.4	36.6	74.1	72.6	71.3	70.1	not polarized
State House 72	47.5	AA	79.1	31.8	99.6	0.4	49.4	69.6	30.4	81.3	79.9	78.6	77.3	not polarized
State Senate 32	39.2	AA	72.9	28.5	99.2	0.8	50.5	65.0	35.0	77.3	75.8	74.3	73.0	not polarized
<b>2016</b>														
2016 Lt Governor	25.9	AA	51.2	42.6	98.8	1.2	73.5	42.3	57.7	63.0	60.5	58.0	55.7	21.4
2016 Treasurer	25.9	AA	50.9	39.2	99.0	1.0	72.0	42.8	57.2	62.6	60.1	57.8	55.5	21.3
<b>2014</b>														
State House 71	45.5	AA	76.6	25.8	99.3	0.7	39.6	62.6	37.4	77.1	75.4	73.7	72.1	not polarized
<b>2012</b>														
2012 President	25.9	AA	53.2	44.5	99.8	0.2	70.2	43.6	56.4	65.4	62.8	60.3	57.9	16.9
2012 Lt Governor	25.9	AA	53.4	44.2	100.0	0.0	68.3	44.2	55.8	66.1	63.5	61.0	58.6	15.2
<b>Democratic primaries</b>														
<b>2018</b>														
none														
<b>2016</b>														
2016 Lt Governor	25.9	AA	56.1	19.5	79.5	20.5	12.5	45.6	54.4	66.3	64.6	62.9	61.1	8.7
2016 Attn General	25.9	AA	45.2	18.9	69.5	30.5	12.1	35.0	65.0	56.0	54.4	52.6	50.8	33.0
2016 Comm of Labor	25.9	AA	60.8	17.8	84.2	15.8	11.7	52.0	48.0	71.4	69.9	68.2	66.5	not polarized
2016 Treasurer	25.9	AA	59.6	18.9	69.4	30.6	11.7	54.4	45.6	63.7	62.9	62.2	61.4	not polarized
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	25.9	AA	58.8	15.1	66.5	33.5	11.2	52.9	47.1	60.7	60.0	59.3	58.6	not polarized
2012 Comm of Labor	25.9	AA	39.7	14.2	49.4	50.6	9.5	35.5	64.5	43.8	43.1	42.4	41.7	106.6

Table 21

Pitt County	percent black VAP of jurisdiction	race of B-P candidate	actual vote for B-P candidate	turnout rate for office and percent vote for black-preferred candidates						percent of vote B-P cand would have received if district was 50% black VAP	percent of vote B-P cand would have received if district was 45% black VAP	percent of vote B-P cand would have received if district was 40% black VAP	percent of vote B-P cand would have received if district was 35% black VAP	percent black VAP must exceed for B-P candidate to win
				black votes			white votes							
				votes cast for office	B-P	all others	votes cast for office	B-P	all others					
<b>General elections</b>														
<b>2018</b>														
State House 8	44.9	AA	64.7	26.7	98.3	1.7	56.2	46.8	53.2	63.4	61.2	59.2	57.3	12.2
State House 9	20.5	AA	40.0	20.1	86.1	13.9	57.6	33.1	66.9	46.8	44.9	43.1	41.5	57.3
<b>2016</b>														
2016 Lt Governor	32.4	AA	51.0	47.4	98.6	1.4	68.1	33.2	66.8	60.0	56.9	53.9	51.0	33.2
2016 Treasurer	32.4	AA	53.0	45.3	99.4	0.6	66.7	35.6	64.4	61.4	58.4	55.5	52.7	30.0
<b>2014</b>														
none														
<b>2012</b>														
2012 President	32.4	AA	53.2	54.8	99.2	0.8	64.1	34.6	65.4	64.4	61.2	58.1	55.0	26.8
2012 Lt Governor	32.4	AA	55.1	53.8	99.0	1.0	62.6	37.3	62.7	65.8	62.8	59.8	56.8	23.2
<b>Democratic primaries</b>														
<b>2018</b>														
State House 8	44.9	AA	50.0	7.4	55.3	44.7	4.4	43.0	57.0	50.7	50.1	49.5	48.8	44.0
<b>2016</b>														
2016 Lt Governor	32.4	AA	52.0	12.2	78.1	21.9	7.2	34.2	65.8	61.8	59.7	57.5	55.1	24.9
2016 Attn General	32.4	AA	61.4	11.7	71.9	28.1	6.8	22.5	77.5	53.7	51.4	48.9	46.3	42.2
2016 Comm of Labor	32.4	AA	50.5	11.5	62.3	37.7	6.7	41.9	58.1	54.8	53.8	52.8	51.7	27.7
2016 Treasurer	32.4	AA	51.3	11.4	55.1	44.9	6.9	43.1	56.9	50.6	50.0	49.4	48.7	45.0
<b>2014</b>														
none														
<b>2012</b>														
2012 Lt Governor	32.4	AA	60.5	13.7	57.2	42.8	7.4	60.9	39.1	58.5	58.7	58.9	59.1	not polarized
2012 Comm of Labor	32.4	AA	32.9	13.1	44.3	55.7	6.7	20.3	79.7	36.2	35.1	33.9	32.6	no clear B-P cand

Table 22A

Robeson County	percent NA VAP of jurisdiction	race of N-P candidate	actual vote for N-P candidate	turnout rate for office and percent vote for Native-preferred candidates							percent of vote B-P cand would have received if district was 50% NA VAP	percent of vote B-P cand would have received if district was 45% NA VAP	percent of vote B-P cand would have received if district was 40% NA VAP	percent of vote B-P cand would have received if district was 35% NA VAP	percent NA VAP must exceed for N-P candidate to win
				Native American votes			non-Native American votes								
				votes cast for office	N-P	all others	votes cast for office	N-P	all others						
<b>General elections</b>															
<b>2018</b>															
State House 46	14.5	AA	36.7	12.4	51.9	48.1	35.9	39.5	60.5	42.7	42.2	41.8	41.4	94.1	
State House 47	46.2	NA	58.9	16.7	79.3	20.7	30.8	38.5	61.5	52.8	51.0	49.3	47.7	42.0	
State Senate 13	26.5	W	61.5	17.5	53.6	46.4	35.2	57.8	42.2	56.4	56.6	56.8	56.9	not polarized	
<b>2016</b>															
2016 Lt Governor	38.2	AA	51.6	24.0	51.7	48.3	46.6	50.7	49.3	51.0	51.0	51.0	50.9	not polarized	
2016 Treasurer	38.2	AA	57.8	22.9	59.1	40.9	45.6	51.5	48.5	54.0	53.7	53.4	53.1	not polarized	
<b>2014</b>															
none															
<b>2012</b>															
2012 President	38.2	AA	58.3	28.3	60.4	39.6	53.5	60.8	39.2	60.7	60.7	60.7	60.7	not polarized	
2012 Lt Governor	38.2	AA	67.5	27.3	73.8	26.2	51.8	66.1	33.9	68.8	68.4	68.1	67.8	not polarized	

Table 22B

Robeson County	percent NA VAP of jurisdiction	race of N-P candidate	actual vote for N-P candidate	turnout rate for office and percent vote for Native-preferred candidates						percent of vote B-P cand would have received if district was 50% NA VAP	percent of vote B-P cand would have received if district was 45% NA VAP	percent of vote B-P cand would have received if district was 40% NA VAP	percent of vote B-P cand would have received if district was 35% NA VAP	percent NA VAP must exceed for N-P candidate to win
				Native American votes			non-Native American votes							
				votes cast for office	N-P	all others	votes cast for office	N-P	all others					
<b>Democratic primaries</b>														
<b>2018</b>														
State Senate 13	26.5	NA	33.1	11.2	52.3	47.7	9.0	22.7	77.3	39.1	37.6	36.1	34.6	90.5
<b>2016</b>														
2016 Lt Governor	38.2	W	22.3	8.5	31.6	68.4	9.9	17.0	83.0	23.7	23.0	22.3	21.6	no clear N-P cand
2016 Attn General	38.2	AA	62.5	8.4	65.2	34.8	10.5	59.3	40.7	61.9	61.6	61.4	61.1	not polarized
2016 Comm of Labor	38.2	W	65.2	8.4	61.3	38.7	9.7	69.1	30.9	65.5	65.9	66.2	66.6	not polarized
2016 Treasurer	38.2	AA	67.1	8.9	72.5	27.5	10.1	59.1	40.9	65.4	64.7	64.1	63.4	not polarized
State House 47	51.0	NA	58.4	11.8	52.2	47.8	9.0	62.7	37.3	56.7	57.3	57.8	58.4	not polarized
<b>2014</b>														
State Senate 13	26.5	W	47.3	12.6	42.7	57.3	17.1	46.1	53.9	44.7	44.8	45.0	45.1	not polarized
<b>2012</b>														
2012 Lt Governor	38.2	AA	52.3	16.2	58.1	41.9	17.3	48.7	51.3	53.2	52.8	52.3	51.9	14.6
2012 Comm of Labor	38.2	W	54.4	16.4	88.0	12.0	16.1	39.4	60.6	63.9	61.5	59.1	56.6	21.5

**Certification**

I certify that the statements and opinions provided in this report are true and accurate to the best of my knowledge, information, and belief.

Lisa Handley

Lisa Handley, Ph.D.

9/17/2019

Date



**Lisa R. Handley**  
CURRICULUM VITAE

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## **Professional Experience**

Dr. Handley has over thirty years of experience in the areas of redistricting and voting rights, both as a practitioner and an academician, and is recognized nationally (as well as internationally) as an expert on these subjects. She has advised numerous jurisdictions and other clients on redistricting and has served as an expert in dozens of redistricting and voting rights court cases. Her clients have included the U.S. Department of Justice and scores of state and local jurisdictions, as well as redistricting commissions and civil rights organizations. Internationally, Dr. Handley has provided electoral assistance in more than a dozen countries, serving as a consultant on issues of democratic governance – including voting rights, electoral system design and electoral boundary delimitation (redistricting) – for the United Nations, the United Nations Development Fund (UNDP), IFES, and International IDEA. In addition, Dr. Handley served as Chairman of the Electoral Boundaries Commission in the Cayman Islands.

Dr. Handley has been actively involved in research, writing and teaching on the subjects of voting rights and redistricting. She has written a book, Minority Representation and the Quest for Voting Equality (Cambridge University Press, 1992) and numerous articles, as well as edited a volume (Redistricting in Comparative Perspective, Oxford University Press, 2008) on these subjects. She has taught political science and methodology courses at several universities, most recently George Washington University. Dr. Handley is a Visiting Research Academic at Oxford Brookes University in the United Kingdom.

Dr. Handley is the President of Frontier International Consulting, a consulting firm that specializes in providing electoral assistance in transitional and post-conflict democracies. She also works as an independent election consultant for such international organizations as the United Nations.

## **Education**

Ph.D. The George Washington University, Political Science, 1991

## **Present Employment**

**President**, Frontier International Electoral Consulting LLC (since co-founding company in September of 1998).

**Senior International Consultant**, provides electoral assistance to such international clients as the UN, UNDP and IFES on electoral district delimitation, electoral system design and minority voting rights.

## **U.S. Clients since 2000**

American Civil Liberties Union (expert testimony in Ohio partisan gerrymander challenge and challenge to Commerce Department inclusion of citizenship question on 2020 census form)

Lawyers Committee for Civil Rights Under Law (expert testimony in challenges to statewide judicial elections in Texas and Alabama)

US Department of Justice (expert witness testimony in several Section 2 and Section 5 cases)

Alaska: Alaska Redistricting Board (redistricting consultation, expert witness testimony)

Arizona: Arizona Independent Redistricting Board (redistricting consultation, expert witness)

Arkansas: expert witness for Plaintiffs in Jeffers v. Beebe

Colorado: Colorado Redistricting Board (redistricting consultation)

Connecticut: State Senate and State House of Representatives (redistricting consultation)

Florida: State Senate (redistricting consultation)

Kansas: State Senate and House Legislative Services (redistricting consultation)

Louisiana: Louisiana Legislative Black Caucus (expert witness testimony)

Massachusetts: State Senate (redistricting consultation)

Maryland: Attorney General (redistricting consultation, expert witness testimony)

Miami-Dade County, Florida: County Attorney (redistricting consultation)

Nassau County, New York: Redistricting Commission (redistricting consulting)

New Mexico: State House (redistricting consultation, expert witness testimony)

New York: State Assembly (redistricting consultation)

New York City: Redistricting Commission and Charter Commission (redistricting consultation and Section 5 submission assistance)

New York State Court: Expert to the Special Master (drew congressional lines for state court)

Ohio: State Democratic Party (redistricting litigation support, expert witness testimony)

Pennsylvania: Senate Democratic Caucus (redistricting consultation)

Rhode Island: State Senate and State House (litigation support, expert witness testimony)

Vermont: Secretary of State (redistricting consultation)

## International Clients since 2000

### United Nations

- Afghanistan – electoral system design and district delimitation expert
- Bangladesh (UNDP) – redistricting expert
- Sierra Leone (UNDP) – redistricting expert
- Liberia (UNMIL, UN peacekeeping mission) – redistricting expert
- Democratic Republic of the Congo (MONUC, UN peacekeeping mission) – election feasibility mission, electoral system design and redistricting expert
- Kenya (UN) – electoral system design and redistricting expert
- Haiti (UN) – election feasibility mission, electoral system design and redistricting expert
- Lead Writer on the topic of boundary delimitation (redistricting) for ACE (Administration and Cost of Elections Project)

### International Foundation for Election Systems (IFES)

- Afghanistan – district delimitation expert
- Sudan – redistricting expert
- Kosovo – electoral system design and redistricting expert
- Nigeria – redistricting expert
- Nepal – redistricting expert
- Georgia – electoral system design and district delimitation expert
- Yemen – redistricting expert
- Lebanon – electoral system design and redistricting expert
- Myanmar – electoral system design and redistricting expert
- Ukraine – electoral system design and redistricting expert
- Pakistan – consultant for developing redistricting software
- Principal consultant for the Delimitation Equity Project – conducted research, wrote reference manual and developed training curriculum
- Writer on electoral boundary delimitation (redistricting), Elections Standards Project
- Training – developed training curriculum and conducted training workshops on electoral boundary delimitation (redistricting) in Azerbaijan and Jamaica

### International Institute for Democracy and Electoral Assistance (International IDEA):

- Consultant on electoral dispute resolution systems
- Technology consultant on use of GIS for electoral district delimitation
- Training – developed training material and conducted training workshop on electoral boundary delimitation (redistricting) for African election officials (Mauritius)
- Curriculum development – boundary delimitation curriculum for the BRIDGE Project
- Project coordinator for the ACE project

Other international clients have included The Cayman Islands; the Australian Election Commission; the Boundary Commission of British Columbia, Canada; and the Global Justice Project for Iraq.

## Previous Employment

**Project Coordinator and Lead Writer on Boundary Delimitation**, Administration and Cost of Elections (ACE) Project. As Project Coordinator (1998 – 2000) of the ACE Project, Dr. Handley served as a liaison between the three partner international organizations – the United Nations, the International Foundation for Election Systems and International IDEA – and was responsible for the overall project management of ACE, a web-based global encyclopedia of election administration. She also served as Lead Writer on Boundary Delimitation for ACE.

**Research Director and Statistical Analyst**, Election Data Services, Inc. (1984 to 1998). Election Data Services (E.D.S.) is a Washington D.C. political consulting firm specialising in election administration. Dr. Handley's work at E.D.S. focused on providing redistricting and voting rights consulting and litigation support to scores of state and local jurisdictions.

**Adjunct Professor** (1986 to 1998). Dr. Handley has taught political science and methodology courses (both at the graduate and undergraduate level) at George Washington University, the University of Virginia, and the University of California at Irvine. She has served as a guest lecture at Harvard, Princeton, Georgetown, American University, George Mason University and Oxford Brookes University in the UK.

## Grants

**National Science Foundation Grant** (2000-2001): Co-investigator (with Bernard Grofman) on a comparative redistricting project, which included hosting an international conference on "Redistricting in a Comparative Perspective" and producing an edited volume based on the papers presented at the conference.

## Publications

### **Books:**

Does Torture Prevention Work? Liverpool University Press, 2016 (served as editor and author, with Richard Carver)

Comparative Redistricting in Perspective, Oxford University Press, 2008 (first editor, with Bernard Grofman).

Delimitation Equity Project: Resource Guide, Center for Transitional and Post-Conflict Governance at IFES and USAID publication, 2006 (lead author).

Minority Representation and the Quest for Voting Equality, Cambridge University Press, 1992 (with Bernard Grofman and Richard Niemi).

**Academic Articles:**

"Minority Success in Non-Majority Minority Districts: Finding the 'Sweet Spot'," Journal of Race, Ethnicity and Politics, forthcoming (with David Lublin, Thomas Brunell and Bernard Grofman).

"Has the Voting Rights Act Outlived its Usefulness: In a Word, "No," Legislative Studies Quarterly, volume 34 (4), November 2009 (with David Lublin, Thomas Brunell and Bernard Grofman).

"Delimitation Consulting in the US and Elsewhere," Zeitschrift für Politikberatung, volume 1 (3/4), 2008 (with Peter Schrott).

"Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence," North Carolina Law Review, volume 79 (5), June 2001 (with Bernard Grofman and David Lublin).

"A Guide to 2000 Redistricting Tools and Technology" in The Real Y2K Problem: Census 2000 Data and Redistricting Technology, edited by Nathaniel Persily, New York: Brennan Center, 2000.

"1990s Issues in Voting Rights," Mississippi Law Journal, 65 (2), Winter 1995 (with Bernard Grofman).

"Minority Turnout and the Creation of Majority-Minority Districts," American Politics Quarterly, 23 (2), April 1995 (with Kimball Brace, Richard Niemi and Harold Stanley).

"Identifying and Remediating Racial Gerrymandering," Journal of Law and Politics, 8 (2), Winter 1992 (with Bernard Grofman).

"The Impact of the Voting Rights Act on Minority Representation in Southern State Legislatures," Legislative Studies Quarterly, 16 (1), February 1991 (with Bernard Grofman).

"Minority Population Proportion and Black and Hispanic Congressional Success in the 1970s and 1980s," American Politics Quarterly, 17 (4), October 1989 (with Bernard Grofman).

"Black Representation: Making Sense of Electoral Geography at Different Levels of Government," Legislative Studies Quarterly, 14 (2), May 1989 (with Bernard Grofman).

"Minority Voting Equality: The 65 Percent Rule in Theory and Practice," Law and Policy, 10 (1), January 1988 (with Kimball Brace, Bernard Grofman and Richard Niemi).

"Does Redistricting Aimed to Help Blacks Necessarily Help Republicans?" Journal of Politics, 49 (1), February 1987 (with Kimball Brace and Bernard Grofman).

***Chapters in Edited Volumes:***

“Redistricting” in Oxford Handbook of Electoral Systems, Erik Herron Robert Pekkanen and Matthew Shugart (eds), Oxford: Oxford University Press, 2018.

“Role of the Courts in the Electoral Boundary Delimitation Process,” in International Election Remedies, John Hardin Young (ed.), Chicago: American Bar Association Press, 2017.

“One Person, One Vote, Different Values: Comparing Delimitation Practices in India, Canada, the United Kingdom, and the United States,” in Fixing Electoral Boundaries in India, edited by Mohd. Sanjeer Alam and K.C. Sivaramakrishnan, New Delhi: Oxford University Press, 2015.

“Delimiting Electoral Boundaries in Post-Conflict Settings,” in Comparative Redistricting in Perspective, edited by Lisa Handley and Bernard Grofman, Oxford: Oxford University Press, 2008.

“A Comparative Survey of Structures and Criteria for Boundary Delimitation,” in Comparative Redistricting in Perspective, edited by Lisa Handley and Bernard Grofman, Oxford: Oxford University Press, 2008.

“Drawing Effective Minority Districts: A Conceptual Model,” in Voting Rights and Minority Representation, edited by David Bositis, published by the Joint Center for Political and Economic Studies, Washington DC, and University Press of America, New York, 2006.

“Electing Minority-Preferred Candidates to Legislative Office: The Relationship Between Minority Percentages in Districts and the Election of Minority-Preferred Candidates,” in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman and Wayne Arden).

“Estimating the Impact of Voting-Rights-Related Districting on Democratic Strength in the U.S. House of Representatives,” in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman).

“Voting Rights in the 1990s: An Overview,” in Race and Redistricting in the 1990s, edited by Bernard Grofman; New York: Agathon Press, 1998 (with Bernard Grofman and Wayne Arden).

“Racial Context, the 1968 Wallace Vote and Southern Presidential Dealignment: Evidence from North Carolina and Elsewhere,” in Spatial and Contextual Models in Political Research, edited by Munroe Eagles; Taylor and Francis Publishing Co., 1995 (with Bernard Grofman).

“The Impact of the Voting Rights Act on Minority Representation: Black Officeholding in Southern State Legislatures and Congressional Delegations,” in The Quiet Revolution: The Impact of the Voting Rights Act in the South, 1965-1990, eds. Chandler Davidson and Bernard Grofman, Princeton University Press, 1994 (with Bernard Grofman).

"Preconditions for Black and Hispanic Congressional Success," in United States Electoral Systems: Their Impact on Women and Minorities, eds. Wilma Rule and Joseph Zimmerman, Greenwood Press, 1992 (with Bernard Grofman).

***Electronic Publication:***

"Boundary Delimitation" Topic Area for the Administration and Cost of Elections (ACE) Project, 1998. Published by the ACE Project on the ACE website ([www.aceproject.org](http://www.aceproject.org)).

***Additional Writings of Note:***

Amicus brief presented to the US Supreme Court in Gill v. Whitford, Brief of Political Science Professors as Amici Curiae, 2017 (one of more than a political scientists to sign brief)

Amicus brief presented to the US Supreme Court in Shelby County v. Holder, Brief of Historians and Social Scientists as Amici Curiae, 2013 (one of several dozen historians and social scientists to sign brief)

Amicus brief presented to the US Supreme Court in Bartlett v. Strickland, 2008 (with Nathaniel Persily, Bernard Grofman, Bruce Cain, and Theodore Arrington).

## **Court Cases since 2015**

*Ohio Philip Randolph Institute v. Larry Householder* (2019) – partisan gerrymander challenge to Ohio congressional districts

*State of New York v. U.S. Department of Commerce/ New York Immigration Coalition v. U.S. Department of Commerce* (2018-2019) – challenge to inclusion of citizenship question on 2020 census form

*U.S. v. City of Eastpointe* (ongoing) – minority vote dilution challenge to City of Eastpointe, Michigan, at-large city council election system

*Alabama NAACP v. State of Alabama* (ongoing) – minority vote dilution challenge to Alabama statewide judicial election system

*Lopez v. Abbott* (2017-2018) – minority vote dilution challenge to Texas statewide judicial election system

*Personhaballah v. Alcorn* (2016-17) – racial gerrymander challenge to Virginia congressional districts