

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
21 CVS 015426

NORTH CAROLINA LEAGUE OF  
CONSERVATION VOTERS, et al.,

REBECCA HARPER, et al.,

Plaintiffs,

vs.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House  
Standing Committee on Redistricting, et al.,

Defendants.

*Consolidated with*  
21 CVS 500085

**LEGISLATIVE DEFENDANTS' SUBMISSION FOR CONSIDERATION  
AS SPECIAL MASTER**

Pursuant to the Court's February 8, 2022 order Legislative Defendants' respectfully submit the name and qualifications of the Special Master they believe should be appointed to assist the Court. Accordingly, Legislative Defendants provide the Court the following:

1. Legislative Defendants request that the Court appoint John Morgan as a Special Master.
2. Mr. Morgan is an experienced redistricting expert who has conducted redistricting work in 20 states since 1991, including North Carolina. During the current redistricting cycle Mr. Morgan is engaged as a mapping expert for the Michigan Independent Citizens Redistricting Commission, the New Jersey Congressional and Legislative Redistricting Commissions, and the Virginia Redistricting Commission, in addition to other states.

3. Mr. Morgan has extensive experience in redistricting and drawing district lines. A true and accurate copy of Mr. Morgan's Resume and CV is attached hereto as Exhibit A.

WHEREFORE, Legislative Defendants respectfully request that the Court appoint John Morgan as Special Master in this matter pursuant to its February 8, 2022 Order.

Respectfully submitted this the 9th day of February, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

It is hereby certified that on this the 9th day of February, 2022, the foregoing was served on the individuals below by email:

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# **Exhibit A**

RETRIEVED FROM DEMOCRACYDOCKET.COM

# John B. Morgan

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## **PROFESSIONAL PROFILE**

Focused and highly motivated management professional, with 20+ years of extensive experience in Redistricting, Demographic and Political analysis and campaign operations. Relying on my background in political history and my knowledge of demographics in nearly every state, I routinely analyze census data and election results to explain trends and make projections to legislators, campaign operatives and members of the press. Over my career I have worked with hundreds of legislators, forming relationships built on trust, bringing data to life and allowing these candidates and lawmakers to make informed decisions. Building on management experience running a national political organization, I have become an effective public speaker and an energetic and inspiring team leader.

As a Redistricting expert, I advise legislators, attorneys and stakeholders about map drawing best practices, data usage, and I navigate them through the complicated process of redistricting after the decennial census. I have conducted redistricting work in 20 states since 1991.

As a Campaign professional, and a lifelong student of American political history, I have used census and political data to analyze elections; craft vote models; and train and advise hundreds of candidates, pollsters and staff in over 40 states.

As an Executive leader, I have experience as a champion for an organization, a spokesman and manager working through difficult transitions. Facing an uncertain future for the organization, during my tenure, I endeavored to preserve existing equity, streamlined operations at every level, and left a positive cash flow for my successors.

## **PROFESSIONAL HISTORY**

### **04/2007 to present, PRESIDENT, Applied Research Coordinates**

SERVED AS REDISTRICTING EXPERT IN COURT TRIALS AND AS CONSULTANT TO STATE REDISTRICTING COMMISSIONS AND STATE LEGISLATIVE BODIES; CONSULTANT TO MULTIPLE CAMPAIGNS. I directly advised and coached legislators, attorneys, local government officials, consultants and stakeholders in the redistricting process. I conducted analytical work with Census P.L. 94-171 data and election data in redistricting efforts in a dozen states, including working with state commissions in Michigan, Virginia, Connecticut, Ohio, New Jersey and Pennsylvania. I generated breakthrough solutions in redistricting

negotiations, fostering progress and ultimately resolution. Over the years, I have drafted plans which were adopted in whole or part in Connecticut, Indiana, Missouri, New Jersey, New Mexico, North Carolina, South Carolina, and Virginia. I have provided expert testimony in redistricting court cases in Virginia, Georgia and New Mexico. I have provided analysis, advice and vote models to hundreds of campaigns from Presidential and U.S. Senate levels to state legislative and municipal levels.

**07/2004 to 03/2007 EXECUTIVE DIRECTOR, GOPAC - Hon. J.C. Watts, Chair**

SERVED AS CEO OF A NATIONAL 527 POLITICAL ORGANIZATION, MANAGING ALL OPERATIONAL ASPECTS. I oversaw core staff, consultants, and in-state trainers for the organization. During my tenure as Executive Director, I expanded and re-branded the organization, all debt was retired and the organization raised over 8.5 Million dollars. Hundreds of state and local candidates and officials received campaign training, while I also brought aspects of time-tested campaign training programs up to the digital age. As the executive leader, I managed an annual budget of over 1.2 Million dollars; I was responsible for all press inquiries and I worked proactively to expand the media footprint of the organization.

**07/1999 to 06/2004, VICE PRESIDENT, Applied Research Coordinates**

SERVED AS JUNIOR PARTNER IN NATIONAL POLITICAL CONSULTING FIRM, RESPONSIBLE FOR HALF OF CLIENT PORTFOLIO AND AS THE LEAD FOR REDISTRICTING SERVICES. I worked on statewide congressional and legislative redistricting plans in Florida, Georgia, Indiana, Iowa, New Jersey, North Carolina, Pennsylvania, Rhode Island, and Virginia. I was responsible for redistricting issues as a member of the Majority Leader Morgan Griffith's legislative staff in Virginia House of Delegates. In Iowa, I drafted alternate plans for legislative leadership to use in evaluating plans drawn by redistricting commission staff. I managed and serviced contracts with state legislative caucuses, traveled to states for presentations, candidate recruitment and election strategy sessions.

**01/1995 to 06/1999, FIELD DIRECTOR, GOPAC - Hon. John Shadegg, Chair**

SERVED AS PRINCIPAL LIAISON TO STATE LEGISLATORS, STATE LEGISLATIVE CAMPAIGN COMMITTEES AND MANAGED POLITICAL OPERATIONS IN THE STATES. As Field Director, I effectively oversaw election targeting and analysis, made campaign contribution recommendations; and assisted in media relations. I travelled the country offering election targeting advice to legislative caucuses and I taught campaign training seminars to candidates and incumbent legislators. On behalf of the organization, I provided strategy and election briefings to donors, officeholders, and other national organizations.

## **06/1991 to 12/1994, RESEARCH ANALYST, Applied Research Coordinates**

SERVED AS RESEARCHER IN NATIONAL POLITICAL CONSULTING FIRM, LEAD DATA RESEARCHER AND UNDERSTUDY FOR REDISTRICTING SERVICES. Worked on statewide congressional and legislative redistricting plans in Florida, Illinois, Indiana, Michigan, New Jersey, New York, Pennsylvania, and Wisconsin. Focused primarily on Voting Rights Act issues with African-American, Hispanic and Asian communities. A Federal court incorporated a portion of legislative plan drafted by my firm for Wisconsin into final decree, finding the configuration superior to other plans in its treatment of minority voters. I worked on senatorial, congressional and legislative and campaigns in a dozen states. I provided strategic planning advice to organizations attempting to win a majority in the U.S. House of Representatives for Republicans in 1994.

## **EDUCATION**

**BA** - History, University of Chicago, Chicago: IL: 1991

\*Graduated Cum laude

\*Bachelors Honor's thesis: "The Net Effects of Gerrymandering 1896-1932."

\*Demographic study on LaSalle, Illinois published in *The History of the Illinois and Michigan Canal, Volume Five*.

## **REFERENCES**

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**JOHN B. MORGAN**  
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**Redistricting Background and Experience**

- Performed redistricting work in 20 states, in the areas of map drawing, problem-solving and redistricting software operation.
- Performed demographic and election analysis work in 40 states, for both statewide and legislative candidates

*2021-2022 Redistricting Cycle*

- Mapping expert for Michigan Independent Citizens Redistricting Commission
- Mapping expert for Virginia Redistricting Commission
- Mapping expert for New Jersey Congressional Redistricting Commission
- Mapping expert for New Jersey Legislative Redistricting Commission
- Staff analyst for New Mexico Senate Republican caucus – Dec. 2021 special session
- Mapping consultant to Indiana State Senate Republican caucus
- Mapping consultant to redistricting commissioners in Atlantic County, New Jersey
- Drafted county commission districts for Sampson County, North Carolina

*2011-2012 Redistricting Cycle*

- Served as a consultant for: Connecticut Redistricting Commission, Ohio Reapportionment Board, New Jersey Legislative Redistricting Commission, New Jersey Congressional Redistricting Commission, Pennsylvania Legislative Reapportionment Commission
- Drafted Wake County, North Carolina school board districts
- Drafted county commission districts in Sampson and Craven counties in North Carolina and Atlantic County in New Jersey
- Worked with redistricting commissions in Atlantic and Essex counties, New Jersey.
- Worked on statewide congressional, legislative, and local plans in the following states: Connecticut, Indiana, Kansas, Missouri, New Jersey, New Mexico, North Carolina, Ohio, Pennsylvania, South Carolina, and Virginia
- Plans drafted by Morgan adopted in whole or part by the following states: Connecticut, Indiana, New Jersey, New Mexico, North Carolina, South Carolina, Virginia.

*2001-2002 Redistricting Cycle*

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Georgia, Indiana, Iowa, New Jersey, North Carolina, Pennsylvania, Rhode Island, and Virginia.
- Dealt with redistricting issues as a member of the Majority Leader's legislative staff in Virginia House of Delegates. Drafted alternate plans for use by the minority parties in Rhode Island. Drafted alternate plans for use by legislative leadership in considering plans drawn by redistricting commission staff in Iowa.

### *1991-1992 Redistricting Cycle*

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Illinois, Indiana, Michigan, New Jersey, New York, Pennsylvania, Wisconsin.
- Focused primarily on Voting Rights Act issues with Black, Hispanic and Asian communities.
- Federal court incorporated portion of legislative plan drafted in part by Morgan for Wisconsin into final decree, finding the configuration superior to other plans in its treatment of minority voters.

### *Expert Experience and Trial Testimony*

- Recognized as an expert in demographics and redistricting in *Egolf v. Duran*, New Mexico First Judicial District Court, Case No. D-101-CV-2011-02942, which dealt with New Mexico's legislative plans. In *Egolf v. Duran*, the Court adopted a House redistricting plan principally drafted by Morgan.
- Filed expert reports in *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*.
- Filed expert reports and expert testimony in *Page v. Board of Elections*, Eastern District of Virginia; provided expert testimony at trial.
- Testified at trial in *Bethune Hill v. Virginia Board of Elections* and *Vesilind v. Virginia Board of Elections*.
- Filed expert report in *Georgia NAACP v. Gwinnett County*
- Filed expert report in *ALPHA PHI ALPHA FRATERNITY INC., et al., vs. BRAD RAFFENSPERGER FILE NO. 1:21-CV-05337-SCJ*
- Filed expert report in *ANNIE LOIS GRANT, et al., vs. BRAD RAFFENSPERGER FILE NO. 1:22-CV-00122-SCJ*
- Filed expert report in *COAKLEY PENDERGRASS, et al., vs. BRAD RAFFENSPERGER FILE NO. 1:21-CV-05339-SCJ*

### **Education**

- Bachelor of Arts degree in History from the University of Chicago
- Graduated with honors.
- Bachelor's Honors thesis on "The Net Effects of Gerrymandering 1896-1932."
- Demographic study on LaSalle, Illinois was published in *The History of the Illinois and Michigan Canal, Volume Five*.

### **Employment**

- President of Applied Research Coordinates, a consulting firm specializing in political and demographic analysis and its application to elections and redistricting, 2007 to present
- Executive Director, GOPAC (Hon. J.C. Watts, Chairman), 2004-2007
- Vice-President of Applied Research Coordinates, 1999-2004
- National Field Director, GOPAC (Rep. John Shadegg, Chairman) 1995-1999
- Research Analyst, Applied Research Coordinates 1991-1995