

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

ALPHA PHI ALPHA FRATERNITY
INC., *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:21-CV-05337-SCJ

ANNIE LOIS GRANT, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:22-CV-00122-SCJ

COAKLEY PENDERGRASS, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:21-CV-05339-SCJ

**CONSOLIDATED RESPONSE TO PLAINTIFFS' OBJECTIONS
REGARDING REMEDIAL PLANS**

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INTRODUCTION

Plaintiffs all agree or do not contest that Georgia has created “an additional majority-Black congressional district in west-metro Atlanta; two additional majority-Black Senate districts in south-metro Atlanta; two additional majority-Black House districts in south-metro Atlanta, one additional majority-Black House district in west-metro Atlanta, and two additional majority-Black House districts in and around Macon-Bibb.” *Compare* Order,¹ p. 509 *with* [APA Doc. 354, p. 18], [Grant Doc. 317, pp. 6–7], [Pendergrass Doc. 317, p. 6]. This critical concession should end the Court’s inquiry, and Georgia should be permitted to implement the compliant remedial plans without further delay.

The sole basis for Plaintiffs’ objections is apparently that they simply wish the General Assembly had accepted their maps instead of drawing its own, despite repeatedly insisting at trial that their maps were merely illustrative of what could be drawn. The objections to the remedial plans reinforce what Defendant has said from the beginning: that Plaintiffs’ case is about electing more Democrats. Indeed, the fact that the General Assembly

¹ For ease of reference, citations to documents in each case’s docket are referenced by the case name. The Court’s final order in all three cases is referenced as “the Order” throughout this brief. All page number citations are to the blue numbers added by the ECF system at the top of each page.

added the required majority-Black districts while not substantially increasing Democratic political performance is apparently why Plaintiffs object to the plans. But this Court has consistently said this case is about the number of *majority-Black districts*—not Democratic districts and not particular candidates. The Court expressly found that “the number of Black-preferred *candidates* who are successfully elected is not the proper consideration for proportionality,” Order, p. 478 (emphasis added), but rather the number of majority-Black *districts* was the proper consideration for determining equal openness. But now that the trial is over, Plaintiffs advance the theory that Georgia is required to protect even majority-white districts due solely to the fact that they currently elect Democratic officials, even though this is not what the Voting Rights Act or this Court required. *See, e.g.*, [Grant Doc. 317, pp. 16–17].

Ultimately, Plaintiffs advance three objections to the remedial plans: (1) this Court indirectly limited the districts the General Assembly could modify, so going outside of those boundaries was improper; (2) the individual line-drawing decisions made by the General Assembly are invalid for a variety of asserted reasons; and (3) the General Assembly eliminated “minority opportunity districts,” which was not separately defined in the Order and about which Plaintiffs and Amici offer at least three different proposed

definitions. All of the proposed definitions relate to partisan outcomes and not the Black population of those districts, which is what this Court required.

As this Court has recognized, “redistricting and reapportioning legislative bodies is a legislative task [which] the federal courts should make every effort not to preempt.” Order, p. 509 (quoting *Wise v. Lipscomb*, 437 U.S. 535, 539 (1978)). Thus, even if this Court would have drawn districts differently, it cannot substitute its judgment for that of the General Assembly when the legislature has fully complied with this Court’s Order regarding the creation and location of new majority-Black districts.

At the end of the day, the remedial plans ensure that Black voters in Georgia are more likely to be in a majority-Black district both statewide and in the districts listed by the Court in its Order than they were previously. And the remedial plans draw extensively on Plaintiffs’ illustrative plans in the creation of the new majority-Black districts, in some cases including more than 80% of the exact geography proposed by Plaintiffs. This Court cannot reject the remedial plan simply because it does not accommodate Plaintiffs’ political goals. The Court should overrule Plaintiffs’ objections and allow the State of Georgia to utilize its chosen district lines in the 2024 election cycle.

FACTS REGARDING REMEDIAL PLANS

I. The 2023 special legislative session.

On the same day the Court issued the Order enjoining the State from using the entirety of the 2021 redistricting plans for Congress, state Senate, and state House, Governor Brian Kemp issued a call for the legislature to assemble in special session to consider updated district boundaries. That special session began on November 29, 2023, and adjourned *sine die* on December 7, 2023. Governor Kemp signed the updated district plans for Congress (SB 3EX), state Senate (SB 1EX), and state House (HB 1EX) into law on December 8, 2023, meeting the deadline set by this Court for the adoption of remedial plans.

II. The Congressional remedial plan (SB 3EX).

A. Drafting and adoption of plan.

On December 1, 2023, Senate Reapportionment and Redistricting Chair Sen. Shelly Echols released a draft Congressional plan. Dec. of Gina Wright, (attached as Ex. A), ¶ 13. At a hearing on December 4 that also took public comment on the draft, Sen. Echols explained the process she used to create the plan. Tr. (Dec. 4, 2023) Senate Reapportionment and Redistricting Comm. Hearing (attached as Ex. F) at 5:13–22. Working with Ms. Wright, Sen. Echols' first step was to locate District 6 as a new majority-Black district in western metro Atlanta, as required by the Court's Order. *Id.* at 6:1–7:3, 8:12–9:5. That

change led to the reconfiguration of nine districts using traditional redistricting principles, including ensuring the partisan balance of the plan did not change. *Id.* at 7:4–8:11.

The changes to District 6 pushed adjoining districts to the east, with District 13 moving substantially east and Districts 4 and 5 less so. *Id.* at 9:6–11:12. In the process, those districts moved into the area formerly occupied by District 7. *Id.* The General Assembly was careful to ensure that it added a new majority-Black district, as this Court required, and in the location this Court instructed. *Id.* at 11:13–23.

Looking at north Georgia, District 14 shifted north in Cobb County and District 11 took more of Cobb County along with Gordon County, while maintaining the same boundary line in Cherokee County as previously. *Id.* at 11:24–12:14. District 7 then moved north to accommodate the shift of population from the west side of metro Atlanta, up to a split of Hall County that recognizes a community of interest around Lake Lanier on the Forsyth-Hall border. *Id.* at 12:15–13:7. Districts 9 and 10 retained their prior character, while making modest adjustments for Congressman Clyde’s home county and maintaining county boundaries to assist election officials. *Id.* at 13:8–14:7. During the entire drawing process, the General Assembly was constantly balancing a number of considerations and was sensitive to ensure it did not eliminate any existing minority opportunity districts. *Id.* at 14:8–16:14.

The Senate Committee approved the Congressional plan to send it to the Senate floor on December 4, 2023, and it passed in a party-line vote on December 5, 2023. *See* Status History of SB 3EX, <https://www.legis.ga.gov/legislation/65853>. The House took up the bill the same day, ultimately passing it on the floor on December 7, 2023. *Id.*

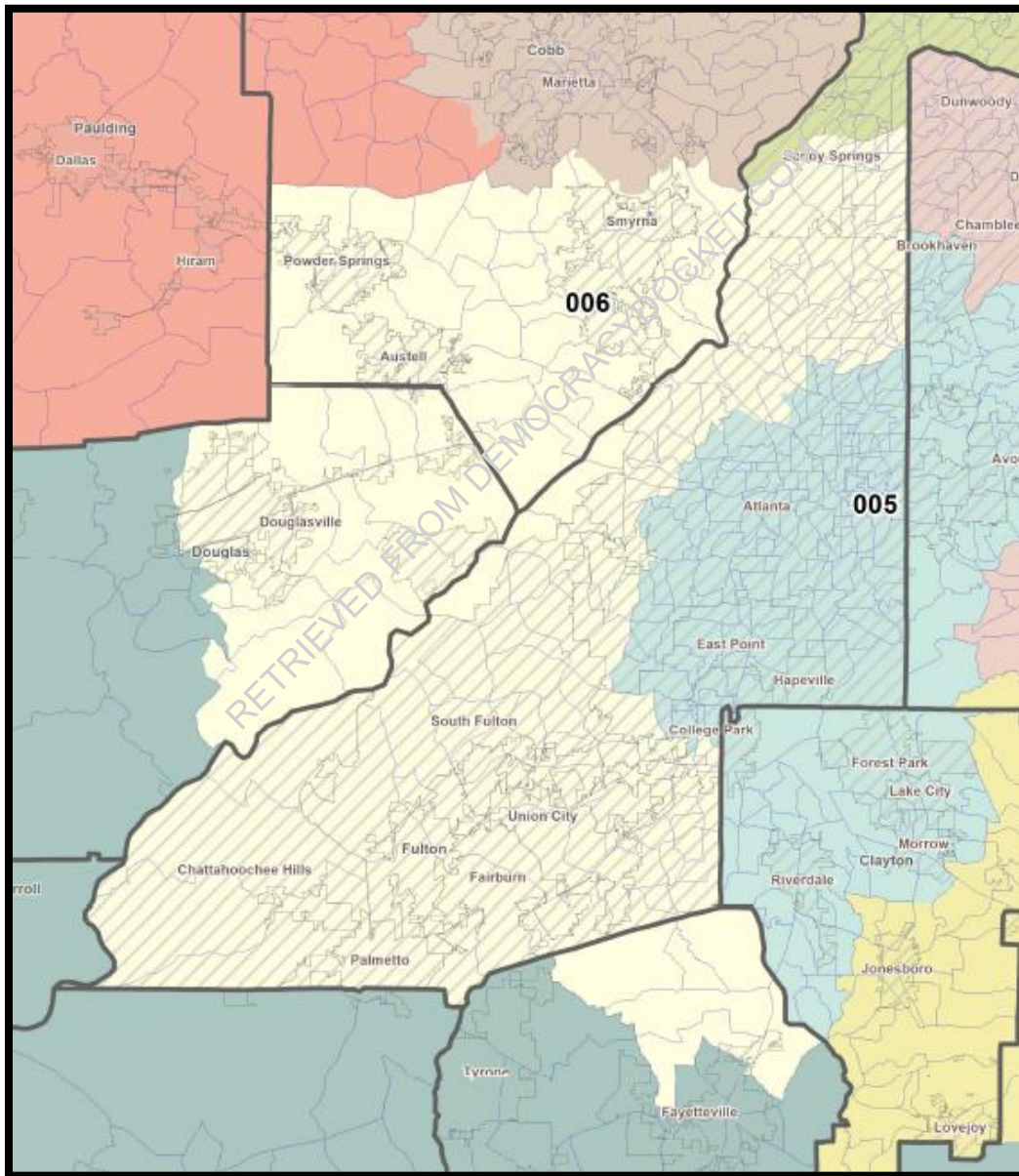
B. Facts regarding Congressional remedial plan.

The Congressional remedial plan increases the number of majority-Black districts by one when using total AP Black population and by two when using AP Black voting age population. Report of Dr. Michael Barber,² attached as Ex. B (Barber Report), § 2.2. The new majority-Black district is District 6, which moves from 9.91% AP Black VAP to 51.75% AP Black VAP. Barber Report, § 2.2, Table 1.

District 6 contains more than 70% of the population that was included in the Cooper Illustrative Congressional District 6, including more than 80% of the Black voting age population that was included in that district. Barber Report, § 2.4. The district is located in western metro Atlanta and includes portions of Cobb, Douglas, and Fulton Counties. Wright Dec. ¶ 17. The General

² To assist the Court in evaluating the remedial plans, Defendant retained a new political-science expert, Dr. Michael Barber, to provide additional information related to the remedial plans and their performance. Dr. Barber's CV is included with his report.

Assembly relied on several of the communities of interest this Court relied on when evaluating the area, including highways and healthcare systems. Ex. F at 8:18–23. District 6 includes the entire cities of Fairburn, Union City, and South Fulton up through the entirety of Powder Springs, Austell, and Smyrna. *Id.* at 8:24–9:5; Wright Dec. ¶ 17.



The Congressional remedial plan increases the number of Black individuals of voting age who live in majority-Black districts on a statewide basis. Barber Report, § 2.3. On the 2021 Congressional plan, 27% of Black individuals of voting age in Georgia lived in a majority-Black district. *Id.* On the Congressional remedial plan, 46.4% of Black individuals of voting age in Georgia now live in a majority-Black district. *Id.* Further, the 2023 remedial plan includes nine majority-white Congressional districts, as this Court indicated it would expect on a remedial plan. Order, p. 265 n.72.

Using total AP Black Population, there is no question that the State moved from four majority-Black Congressional districts (2, 4, 5, 13) to five majority-Black Congressional districts on the Congressional remedial plan (2, 4, 5, 6, 13). Wright Dec. ¶ 18. This means that Black voters are now a majority in either 35.7% (using total population) or 28.6% (using voting-age population) of all Congressional districts in a state with a Black voting-age population of 31.73%. *See* Order, p. 265.

III. The Senate remedial plan (SB 1EX).

A. Drafting and adoption of plan.

When the Senate Reapportionment and Redistricting Committee convened on the first day of the special session, Sen. Echols explained the process of drawing the Senate plan, which involved heavy reliance on Gina Wright. Tr. (Nov. 29, 2023) Senate Reapportionment and Redistricting Comm.

Hearing (attached as Ex. C) at 2:25–4:8. Sen. Echols then outlined the process for creating the two majority-Black districts in south metro Atlanta, including meetings with Senators so she could understand the communities of interest that were involved. *Id.* at 6:1–6. Vice-Chair Sen. Bo Hatchett explained the various considerations that went into the drawing process, beginning with compliance with this Court’s Order. *Id.* at 7:10–8:16.

Sen. Echols then explained the changes that were made to the 15 Senate districts that were modified to add Districts 17 and 28 as the new majority-Black districts required by this Court. *Id.* at 8:17–9:21. Sen. Echols also explained the process of taking into account traditional redistricting principles and other considerations that went into the design of the plan. *Id.* at 9:22–23:24. In that explanation, she detailed the various communities and other factors considered for each of the 15 districts that were modified. *Id.* District 42, which was previously in DeKalb County, moved to the southeast and took much of the territory that had been in the previous District 17, including areas that shared strong connections and are rural in character. *Id.* at 16:18–17:9. District 43 and 55 both moved north, while maintaining the community connections that existed previously. *Id.* at 17:10–18:5. Districts 10 and 41 shifted to make room for the districts moving north out of Henry County after the creation of District 17. *Id.* at 18:6–19. District 44 also shifted north to create

room for new District 17, and ensures that the boundaries of the City of Decatur are followed. *Id.* at 19:5–18.

On the other side of metro Atlanta, the Senate plan does not make changes to Districts 16, 34, and 36 because it was able to move other districts. *Id.* at 19:19–20:8. District 39 kept most of its current configuration. *Id.* District 38 shifted north and east to accommodate the addition of District 28 in the south, and now is wholly within Fulton County instead of including portions of Cobb. *Id.* at 20:9–18. Districts 33 and 35 likewise shift north to make room for District 28 in south Metro Atlanta, while still maintaining a strong number of connections and communities and keeping Powder Springs whole in District 33. *Id.* at 20:19–21:15. After the creation of all of these districts, there was significant population left in the areas around Coweta and Heard counties, which became the new District 6. *Id.* at 21:16–19. The configuration of that district avoided a split of Coweta County while also moving north into Carroll County, recognizing a number of communities in that area. *Id.* at 21:19–22:7. Small adjustments were made to District 30 to round out the population, while recognizing the communities in that area. *Id.* at 22:8–22.

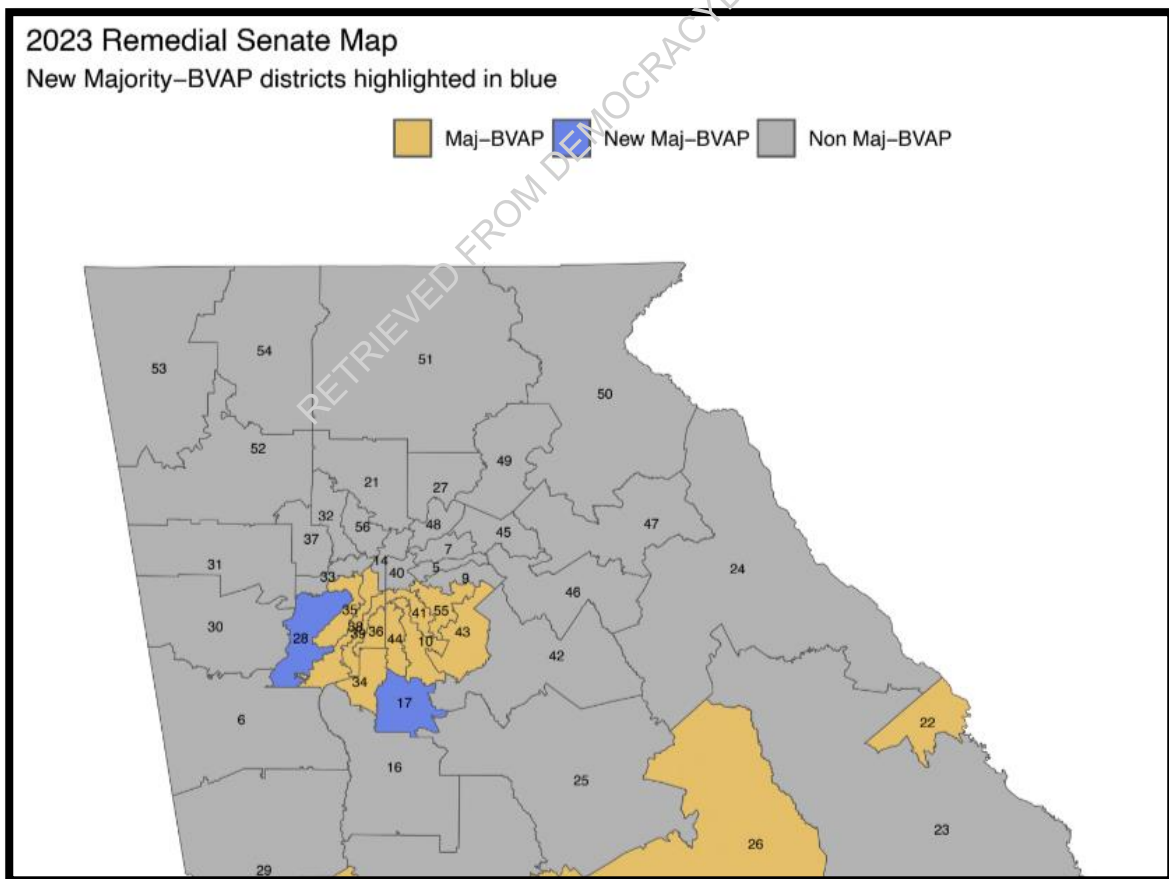
The resulting Senate plan does not pair any incumbents of either political party. *Id.* at 10:24–11:9.

The Senate remedial plan was approved by the Senate committee on November 30, 2023 before receiving approval of the Senate on December 1,

2023 and the House on December 5, 2023. *See* Status History of SB 1EX, <https://www.legis.ga.gov/legislation/65851>.

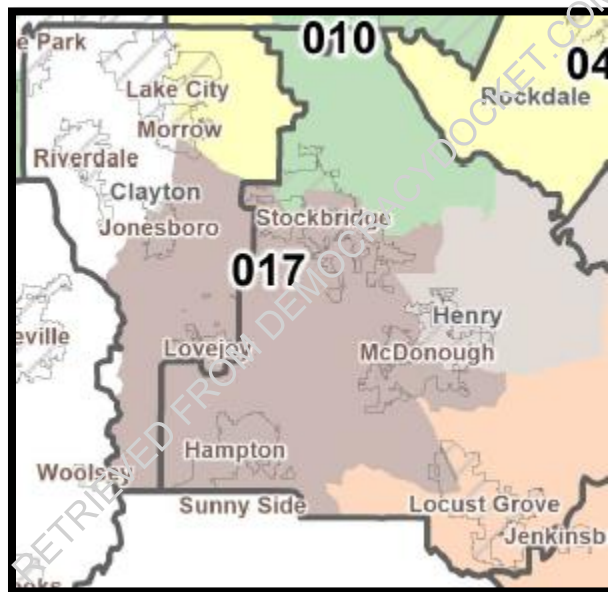
B. Facts regarding Senate remedial plan.

The Senate remedial plan increases the total number of majority-Black districts by two and decreases the total number of majority-white districts by two. Barber Report, § 3.2. The new majority-Black districts are (1) District 17, which moves from 32.01% AP Black VAP to 63.61% AP Black VAP and (2) District 28, which moves from 19.51% AP Black VAP to 56.42% AP Black VAP. *Id.* The plan increases the number of split counties by one. Wright Dec. ¶ 23.



Barber Report, p. 15.

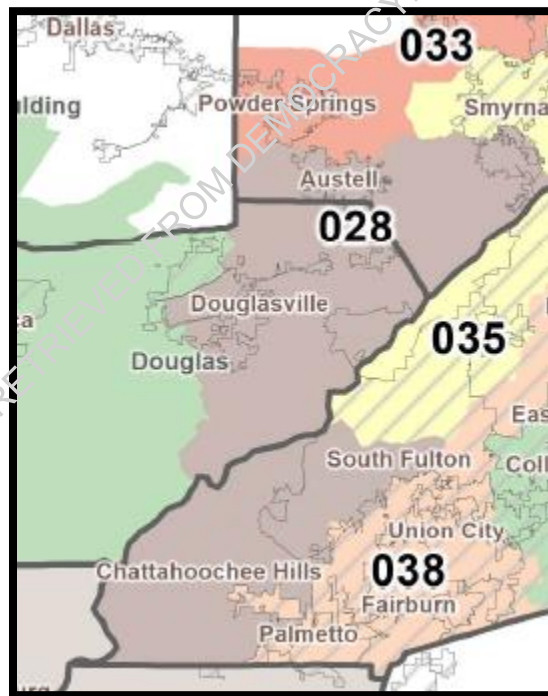
District 17 contains nearly 80% of the total population that was included in the Esselstyn Illustrative Senate District 25 and more than 40% of the total population that was included in Cooper Illustrative Senate District 16. Barber Report, § 3.5. This district includes portions of Henry and Clayton Counties, which are both in south Metro Atlanta.³ Wright Dec. Ex. 2. District 17 was designed to include most of Stockbridge and McDonough along with the panhandle of Clayton County. Ex. C at 11:22–12:4.



District 28 includes more than half of the population from Cooper Illustrative Senate District 20 and more than half of the population from Esselstyn Illustrative Senate District 35. Barber Report, § 3.2. Sen. Echols

³ The following maps are drawn from the Wright Dec. Ex. 2 and show only changed districts in color.

recognized that the different Plaintiff experts in the *APA* and *Grant* cases had placed District 28 in two different south-Atlanta locations. Ex. C at 12:10–18. Sen. Echols chose to anchor the district in South Fulton while minimizing changes to some adjoining districts, with the resulting configuration ensuring that Black voters in Fulton, Fayette, and Clayton Counties are all placed in majority-Black districts. *Id.* at 12:19–13:1. The configuration of District 28 in south metro Atlanta also connected suburbs that are experiencing growth and assisted election officials by not making changes in some areas. *Id.* at 13:2–13. Wright Dec. ¶ 20.



The Senate remedial plan increases the number of Black individuals of voting age who live in majority-Black districts. On the 2021 Senate plan, 49.7% of Black individuals of voting age in Georgia lived in a majority-Black district.

Barber Report, § 3.3. On the Senate remedial plan, 53.5%% of Black individuals of voting age in Georgia now live in a majority-Black district. *Id.* In looking at just the districts the Court identified as setting the area of Section 2 violations, the percentage of Black individuals of voting age living in a majority-Black district also increases on the Senate remedial plan. Barber Report, § 3.3.

IV. The House remedial plan (HB 1EX).

A. Drafting and adoption of plan.

When the House Reapportionment and Redistricting Committee convened on the first day of the special session, Chairman Rep. Rob Leverett explained the map he had created to the committee, beginning with the Order of this Court. Tr. (Nov. 29, 2023) House of Representatives Reapportionment and Redistricting Comm. Hearing (attached as Ex. D) at 18:22–19:17. After explaining the design of each of the five new majority-Black districts, *id.* at 19:18–22:18, Rep. Leverett then explained the other changes that resulted from adding those new districts, noting the “ripple effects” occurring in other areas due to the creation of the majority-Black districts. *Id.* at 22:19–23:9. Rep. Leverett created the plan with Ms. Wright and explained the other traditional redistricting principles he followed in creating the plan, including input from other House members of both political parties. *Id.* at 23:14–26:12. The resulting plan changed 56 districts and paired four sets of incumbents, three

sets of Democrats paired with other Democrats and one set of a Republican paired with a Republican, along with drawing a Republican into a majority-Democratic district. *Id.* at 24:12–25.

Rep. Leverett then explained all of the various changes and interests that went into the districts, beginning in Douglas County, going into Macon, then up through south Metro Atlanta, with Ms. Wright also weighing in about the process. *Id.* at 26:13–34:18. The ripple effect from the creation of District 64 pushed other districts north into Fulton and Cobb Counties, leading to the collapse of District 40, which was a majority-white district in Cobb County. *Id.* at 26:20–27:10. That led to the movement of District 40 to the western side of the metro Area. *Id.* at 27:11–25.

Similarly, changes in Macon also pushed other districts north, with some movement in Houston County. *Id.* at 28:1–22. The plan eliminates a county split in Jasper County, which was previously split. *Id.* at 29:1–5. District 135 shifts to pair two Republican incumbents, and other districts shift on the eastern side to make room for some of the Henry County changes. *Id.* at 29:6–19.

In the metro area, District 82 moves from DeKalb down to south metro and the other Henry and Clayton area districts shift north, and makes changes at the request of Democratic Rep. Demetrius Douglas. *Id.* at 29:20–30:7. Configuring Henry County and south DeKalb in the way the House did allows

the plan to avoid making further changes to Clayton County to ease the burdens on election officials in implementing the plan. *Id.* at 30:8–12.

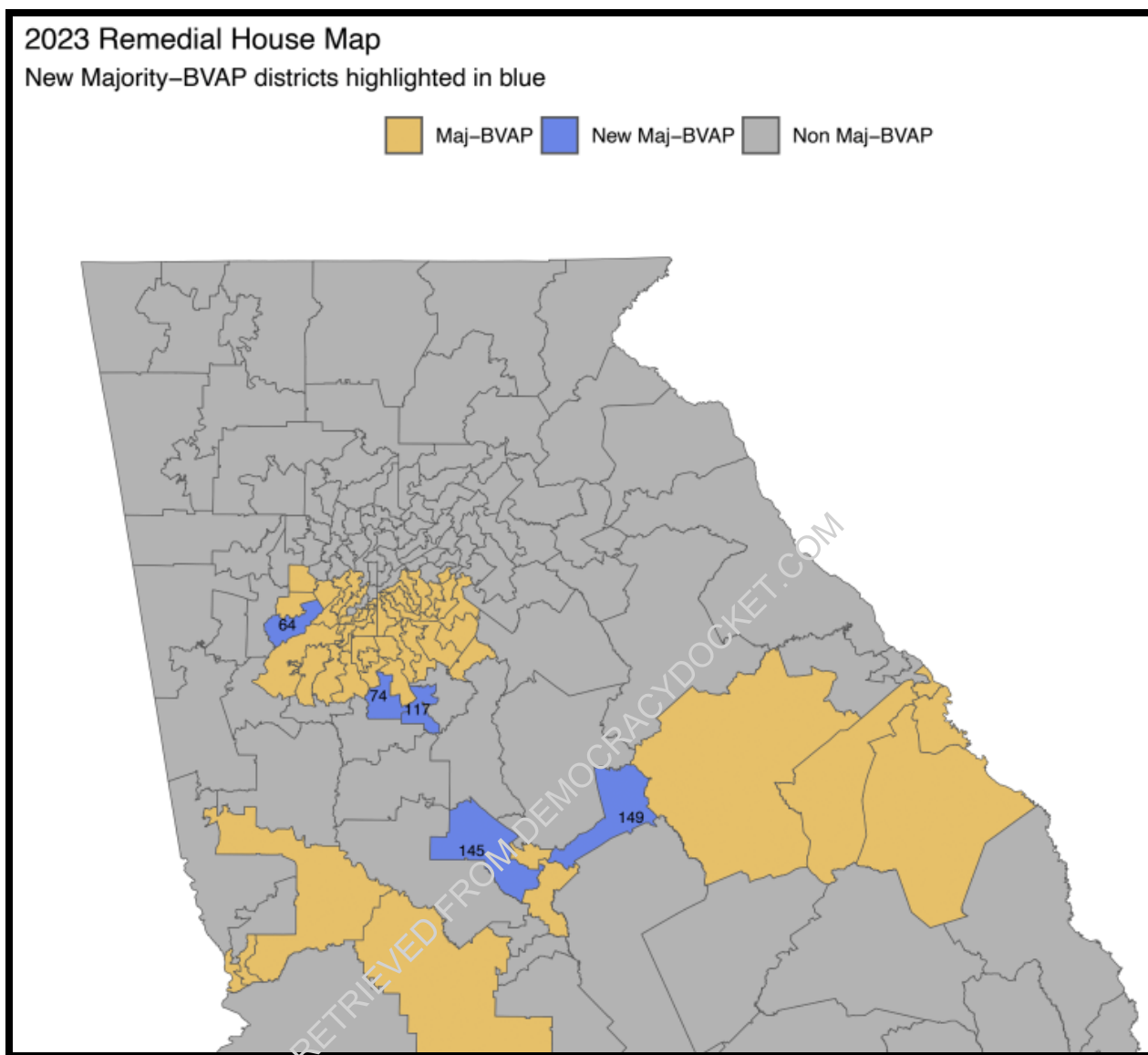
The ripple effects continue through Morgan and Newton, reaching back into DeKalb and up into Gwinnett County. *Id.* at 30:19–31:12. Consistent with the prior configuration of DeKalb County districts, the new configuration of districts stripes from north to south, ensuring that almost all incumbents in that area have a district in which to run. *Id.* at 31:7–32:4. When getting into Gwinnett County, as Rep. Leverett explained, the “wave is starting to dissipate,” with several changes to that area. *Id.* at 32:5–13.

After fully explaining the changes and answering committee questions, *id.* at 33:11–40:3, Rep. Leverett then held time for public comment on the proposed plan. *Id.* at 40:4–16. The only other House redistricting plan presented to the House committee, by Democratic Leader Rep. James Beverly, only created four additional majority-Black districts instead of the five this Court required. *See* Tr. (Nov. 30, 2023) House Reapportionment and Redistricting Comm. Hearing (attached as Ex. E) at 26:18–29:19.

The House plan was approved by the committee on November 30, 2023, before going on to be approved by the House on December 1, 2023, and the Senate on December 5, 2023. *See* Status History of HB 1EX, <https://www.legis.ga.gov/legislation/65850>.

B. Facts regarding House remedial plan.

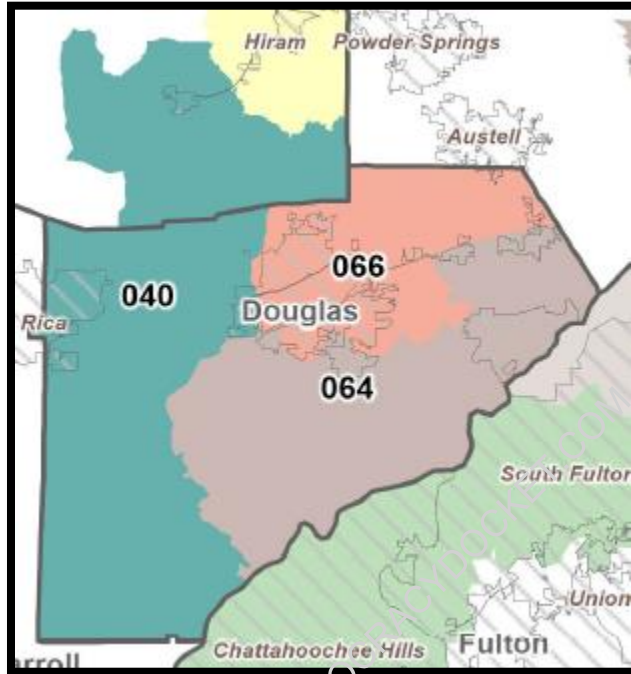
The remedial state House plan increases the number of majority-Black districts by five and decreases the number of majority-white districts by five. Barber Report, § 4.2. The new majority-Black districts are (1) District 64 (west Metro Atlanta), which goes from non-majority Black to 52.43% AP Black VAP; (2) District 74 (south Metro Atlanta), which goes from non-majority Black to 66.0% AP Black VAP; (3) District 117 (south Metro Atlanta), which goes from non-majority Black to 62.93% AP Black VAP; (4) District 145 (metro Macon), which goes from non-majority Black to 50.30% AP Black VAP; and (5) District 149 (metro Macon) which goes from non-majority Black to 50.03% AP Black VAP. Barber Report, § 4.2, Table 9. The House remedial plan decreases the overall number of split counties in the state by one. Wright Dec. ¶ 30.



Barber Report, p. 26.

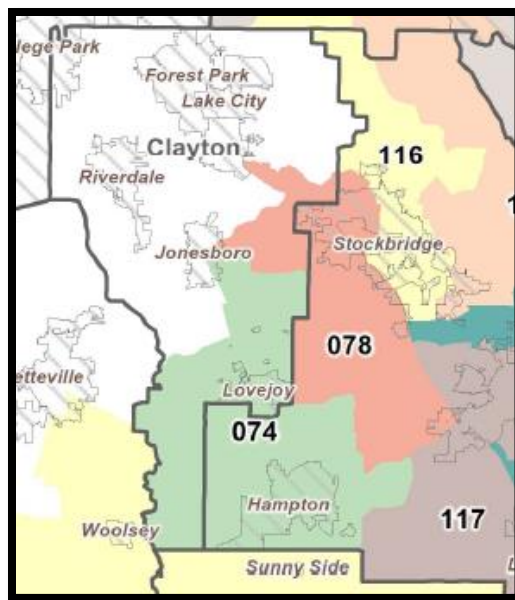
District 64 contains more than half of the total population that was included in the Esselstyn Illustrative House District 61. Barber Report, §4.4. This district configuration enabled the reduction of one district in Douglas

County, splitting the county into three districts rather than four, so that District 64 is located entirely in Douglas County.⁴ Wright Dec. ¶ 26.

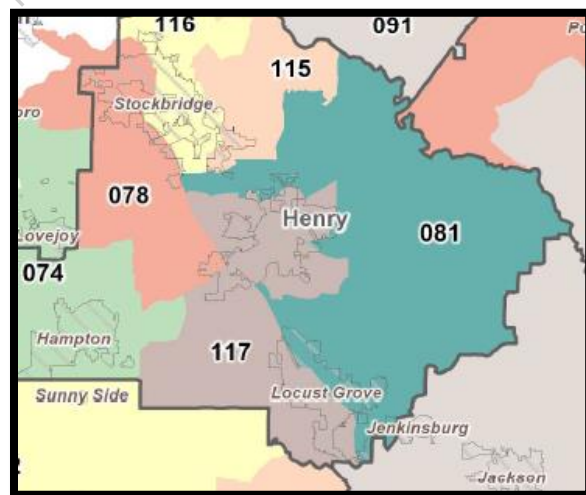


District 74 contains 80.8% of the population that was included in Cooper Illustrative House District 74. Barber Report, § 4.5, Table 12. Rep. Leverett consulted the Plaintiffs' expert district for that configuration. Ex. D at 20:10–17. This district is located in Clayton and Henry Counties, which are in south Metro Atlanta. Wright Dec. ¶ 24.

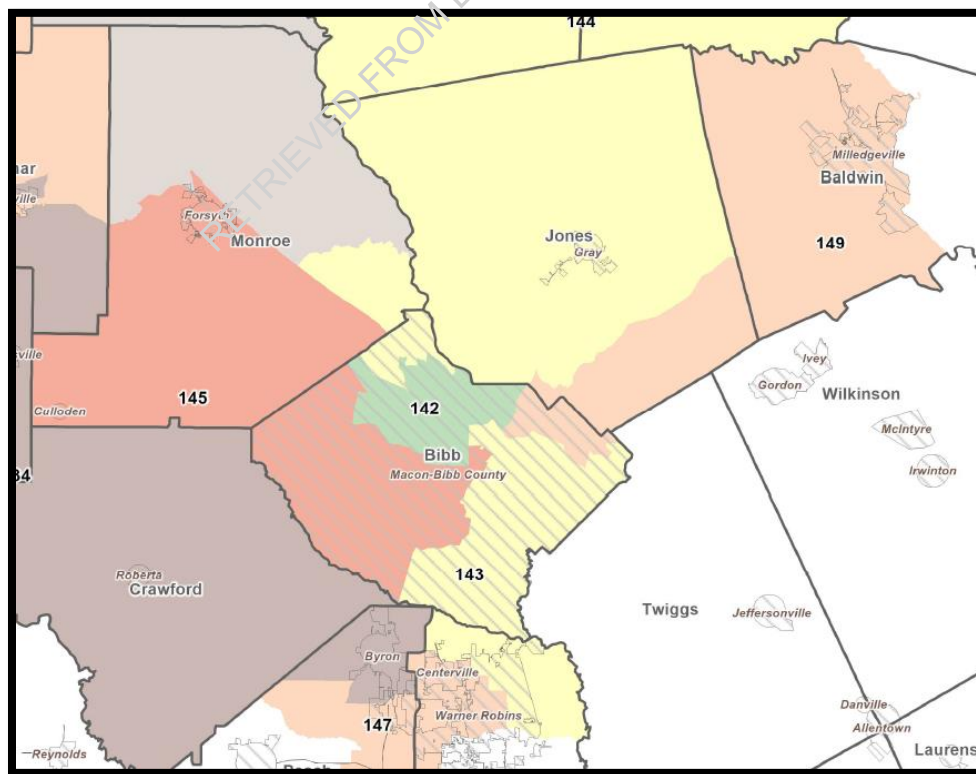
⁴ The following maps are drawn from the Wright Dec. Ex. 3 and show only changed districts in color.



District 117 includes nearly 70% of the population included in Esselstyn Illustrative House District 117. Barber Report, § 4.5, Table 12. This was part of the goal of Rep. Leverett, and the district includes almost all of McDonough and portions of Locust Grove, using I-75 as a boundary line. Ex. D at 20:22–21:8. This district is located wholly in Henry County, which is in south Metro Atlanta. Wright Dec. ¶ 27.



Districts 145 and 149 include significant portions of the population included in the Esselstyn versions of the Macon area. Barber Report, § 4.6, Table 13. Rep. Leverett included the county seat of Forsyth County in District 145 and mostly utilized updated precincts in Macon, while protecting incumbents. Ex. D at 21:9–22. District 149 had what Rep. Leverett called a better configuration than Mr. Esselstyn’s version, using a highway in Jones County instead of Twiggs and Wilkinson Counties to connect Macon and Milledgeville, and avoiding changing the existing split of Baldwin County. *Id.* at 21:23–22:13. The addition of those districts means that there are now four majority-Black districts that are anchored in the Macon area, Districts 142, 143, 145, and 149. Barber Report, § 4.2, Table 9.



The House remedial plan increases the number of Black individuals of voting age who live in majority-Black districts. On the 2021 House plan, 53.5% of Black individuals of voting age in Georgia lived in a majority-Black district. Barber Report, § 4.3. On the House remedial plan, 56.6%% of Black individuals of voting age in Georgia now live in a majority-Black district. *Id.* In looking at just the districts the Court identified as setting the area of Section 2 violations, the percentage of Black individuals of voting age living in a majority-Black district goes from 53.7% to 74.3% on the House remedial plan. *Id.*

V. Implementation of the remedial plans

In their committee presentations, the chairs of redistricting committees in both chambers emphasized the importance of ease of implementation of the new remedial plans. Ex. C at 14:18–23; Ex. D at 24:1–4, 25:20–24. Ms. Wright’s office prepares the maps for county election officials to utilize in reassigning voters after each change in district boundaries. Wright Dec. ¶¶ 31–32. Across all three plans, the total number of counties that are required to make changes to district boundaries as a result of the remedial plans is 20 out of 159 or only about 12.6% of the counties in Georgia. Wright Dec. ¶ 33. Minimizing the number of counties that have to make changes is a benefit to the county election officials who have to implement the new plans. Wright Dec. ¶ 34.

Further, when creating the remedial plans, Ms. Wright utilized updated precincts where those were available from counties. Wright Dec. ¶¶ 36–40.

Because counties change precinct boundaries frequently, the number of split Census VTDs does not indicate whether the plan can be easily administered or not, but Ms. Wright relied on updated precinct boundaries, not Census VTDs, when creating districts for the remedial plans. *Id.*

STANDARD ON REVIEW OF REMEDY

“[A] district court’s remedial proceedings bear directly on and are inextricably bound up in its liability findings.” *Wright v. Sumter Cty. Bd. of Elections & Registration*, 979 F.3d 1282, 1302-03 (11th Cir. 2020). And “any proposal to remedy a Section 2 violation must itself conform with Section 2.” *United States v. Dallas Cty. Comm’n*, 850 F.2d 1433, 1437-38 (11th Cir. 1988) (quoting *Dillard v. Crenshaw Cty.*, 831 F.2d 246, 249 (11th Cir. 1987)). Thus, the inquiry for this Court in this case is whether the proposed remedial plan “*completely* remedies the prior dilution of [Black] voting strength and *fully* provides equal opportunity for [Black] citizens to participate and to elect candidates of their choice.” *Dallas Cty. Comm’n*, 850 F.2d at 1442 (emphasis in original).

As this Court explained, that means the Court must evaluate the remedial plans to determine if they include “an additional majority-Black congressional district in west-metro Atlanta; two additional majority-Black Senate districts in south-metro Atlanta; two additional majority-Black House districts in south-metro Atlanta, one additional majority-Black House district

in west-metro Atlanta, and two additional majority-Black House districts in and around Macon-Bibb” without eliminating any existing minority opportunity districts. Order, pp. 509–11. If the plans do this—and otherwise comply with Section 2 and applicable law—then that is the end of the inquiry.

This Court already explained that it would utilize the *Gingles* standard to determine whether the remedial plans “provide[] Black voters with an additional opportunity district.” Order, p. 511. Each district plan passed by the General Assembly provides exactly the districts this Court required to provide additional opportunities for Black voters.⁵ And “States retain broad discretion in drawing districts to comply with the mandate of § 2.” *Shaw v. Hunt*, 517

⁵ In case there is any question, the relevant minority group in this case is Black voters. Order, p. 9 (“the Court determines that in certain areas of the State, the political process is not equally open to Black voters.”); *see also id.* at 96, 107 (APA Cooper legislative plans involved majority-Black districts); 115 (*Grant* Esselstyn only considered Black population); 142 (Palmer only evaluated Black and white voter cohesion, not other minority groups); 149 (Handley only evaluated Black and white voter cohesion, not other minority groups); 201 (*Pendergrass* reference to minority community was to Black voters); 209, 211 (question in *Pendergrass* case was equal openness of process as to “affected Black voters”); 242 (electoral structure was found to affect Black voters); 272-273 (findings as to Black voters); 274 (question in APA and *Grant* cases was equal openness of process to Black voters); 405-406 (findings regarding Black community in context of Section 2 violation); 426-427 (question in APA and *Grant* cases was equal openness of process as to “affected Black voters”); 510 (injury was to “Plaintiffs and other Black voters in Georgia”); 511 (remedy will be assessed to determine “whether it provides Black voters with an additional opportunity district”).

U.S. 899, 917 n.9 (1996) (citing *Voinovich v. Quilter*, 507 U.S. 146, 156–157 (1993); *Grove v. Emison*, 507 U.S. 25, 32–37 (1993)).

RESPONSES TO PLAINTIFFS’ OBJECTIONS

While each Plaintiff group filed its own objections, this Court directed Defendant to file a single response brief of up to 75 pages. [APA Doc. 348, p. 2]; [Grant Doc. 309, p. 2]; [Pendergrass Doc. 309, p. 2]. Because many of the objections overlap, this brief considers all the various objections raised by the Plaintiff groups.

I. The General Assembly is not limited to the districts listed in the Court’s Order when creating a remedial plan (APA/Grant/Pendergrass).

Plaintiffs selected the districts the Court identified as part of the regions in which it found Section 2 violations. *See* Order, pp. 512–13, nn.138, 139. Plaintiffs now take the novel view that this Court imposed limits on what the General Assembly could redraw when it delineated the relevant area the Plaintiffs now designate as the “vote dilution area.” Plaintiffs do not cite any authority for the proposition that legislative remedies are limited to a “vote dilution area,” and Defendant was unable to find any case that uses that term in this context. And it makes sense that such a limitation cannot exist, because of the federalism concerns this Court earlier identified limiting the Court’s authority to interfere in legislative decision-making.

This Court enjoined the entirety of the plans at issue and directed the General Assembly to adopt “a substitute measure” that complies with the Court’s Order. Order, p. 509 (quoting *Wise*, 437 U.S. at 540). As discussed below, this Court did not affirmatively limit the General Assembly’s process for creating remedial plans and could not do so.

A. Unlike racial gerrymandering cases, Section 2 claims involve regions, and the legislature drew the new districts precisely where this Court required them to be drawn.

To have a claim under Section 2 regarding districts, plaintiffs must only live in a *region* that could support an additional majority-minority voting district because the harm is vote dilution, not necessarily the boundaries of individual districts. *Thompson v. Kemp*, 309 F. Supp. 3d 1360, 1365 (N.D. Ga. 2018) (three-judge court). That is different from a racial gerrymandering claim, where the individuals have to live in the challenged *districts*—because they are challenging the configuration of those specific district boundaries. *United States v. Hays*, 515 U.S. 737, 745 (1995); accord *Dillard v. Baldwin Cty. Comm’rs*, 225 F.3d 1271, 1279 (11th Cir. 2000).

That is why this Court’s Order did not find the particular district *boundaries* it listed violated Section 2. The Order explained that a lack of equal openness existed in certain *areas* of the state and proceeded to describe those areas through the identification of districts contained in Plaintiffs’ complaints. Order, pp. 512–13. It is Plaintiffs who artfully reinterpret the Court’s Order as

requiring something different. The Court did not mandate the General Assembly redraw every district in those defined areas. The Court did not limit the General Assembly to only redrawing districts in those areas. It gave specific instructions on what the General Assembly needed to do to remedy the vote dilution the Court found in those areas—draw the additional majority-Black districts in the defined *regions*, not redraw every *district* in the list of districts. Order, p. 509.

1. *The new majority-Black districts are not drawn “somewhere else in the State.”*

Even if the State was not limited to the specific districts, Plaintiffs still complain that new majority-Black districts are located “somewhere else in the State.” *See, e.g.*, [APA Doc. 354, p.12] (quoting *Shaw*, 517 U.S. at 917). But this charge makes no sense when viewed in light of the facts of *Shaw* and the districts actually drawn by the General Assembly.

Plaintiffs are correct that a Section 2 violation cannot be remedied by creating a new majority-Black district “somewhere else in the state,” *Shaw*, 517 U.S. at 917, but that fact leaves open the question of what exactly constitutes “somewhere else in the state.” Without pointing to any authority in support, Plaintiffs urge this Court to adopt a standard that states must draw remedial districts *precisely and only* in the districts specified by the Court in the liability phase of the proceedings, and that they must not venture *anywhere*

outside those areas. [APA Doc. 354, p. 12]; [Grant Doc. 317, pp. 9–15]; [Pendergrass Doc. 317, pp. 8–10]. But there is no support for such a narrow interpretation of the State’s remedial authority under Section 2 in either this Court’s Order or in precedent.

First, this Court identified the *injury* and the *remedy* in two distinct parts of the Order. The Court found the area of injury to encompass a list of districts that defined an area. Order, p. 514. But immediately preceding that list, the Court articulated what the State must do to remedy the injury found in these areas: for each map, draw a remedial plan that created new districts in particular regional locations.⁶ *Id.* at 509. Separating the identified area of injury from the broader region in which to locate the remedial districts makes sense given the federalism concerns in voting rights cases, as this Court recognized: “The Court is conscious of the powerful concerns for comity involved in interfering with the State’s legislative responsibilities. As the Supreme Court has repeatedly recognized, ‘redistricting and reapportioning

⁶ Members of the General Assembly expressed gratitude for the specificity of what the General Assembly needed to do to comply with the Court’s order. *See* Ex. D, 19:5–12 (Rep. Leverett); Tr. (Dec. 1, 2023) House Floor Debate (attached as Ex. H) at 4:4–5:2; Tr. (Dec. 1, 2023) Senate Floor Debate (attached as Ex. G) 21:21–22:21 (Sen. Watson), 145:4–148:15 (Sen. Kennedy); Tr. (Dec. 7, 2023) House Floor Debate (attached as Ex. I) at 71:11–72:4 (Rep. Leverett).

legislative bodies is a legislative task [which] the federal courts should make every effort not to preempt.” Order, p. 509 (quoting *Wise*, 437 U.S. at 539).

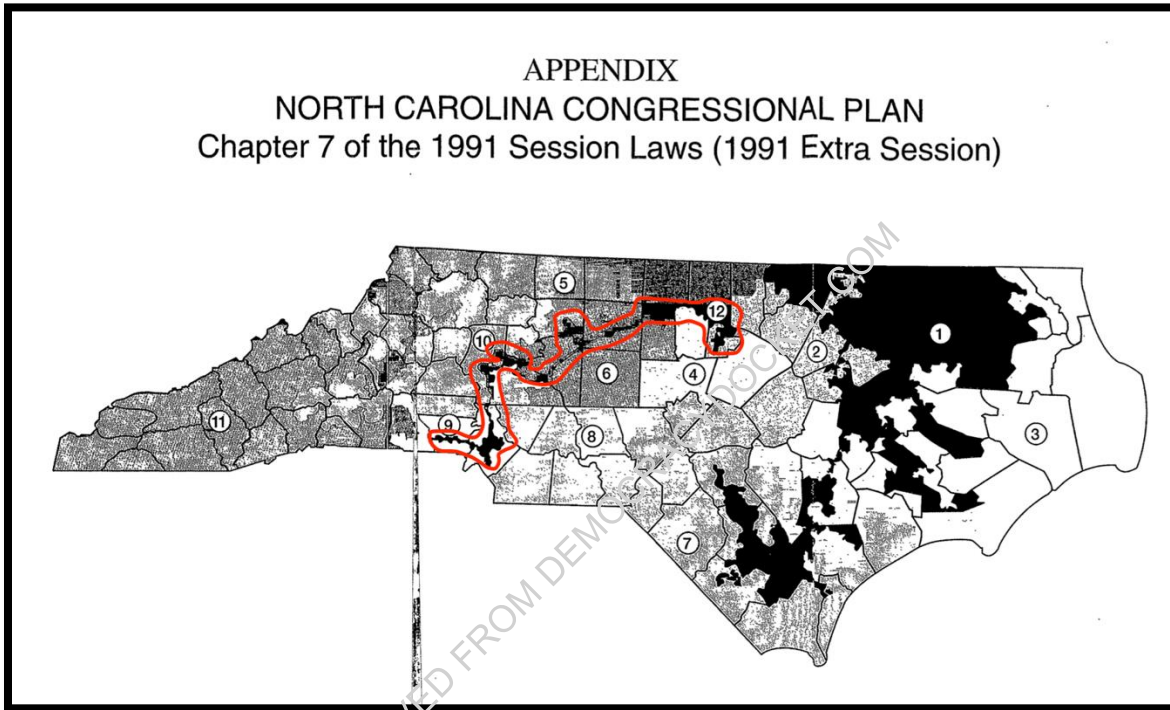
To that end, when vote dilution is found, that “does not mean that a § 2 plaintiff has the right to be placed in a majority-[Black] district once a violation of the statute is shown. *States retain broad discretion in drawing districts to comply with the mandate of § 2.*” *Shaw*, 517 U.S. at 917 n.9 (emphasis added).⁷

Thus, while the Court found an injury in specific “districts/areas” of the state, it couched the location of the remedial districts in broader terms. The Court properly declined to go so far as to limit the State to crafting a remedial district *wholly within* particular regions. Rather, the Court stated that the districts must be more broadly *in* particular regions, for example, the South Metro Atlanta area. That is exactly what the General Assembly did in the remedial plans, and nothing in the cases relied on by Plaintiffs suggests this Court should find otherwise.

In *Shaw*, which Plaintiffs quote extensively, the Department of Justice declined to preclear a redistricting map under Section 5 because it failed to give effect to minority voting strength in the south-central to southeastern portions of North Carolina, in violation of the VRA. North Carolina responded,

⁷ This binding precedent from the Supreme Court ends APA Plaintiffs’ complaints about Mr. Woods being left out of a majority-Black district on the remedial plans. [APA Doc. 354, p. 17].

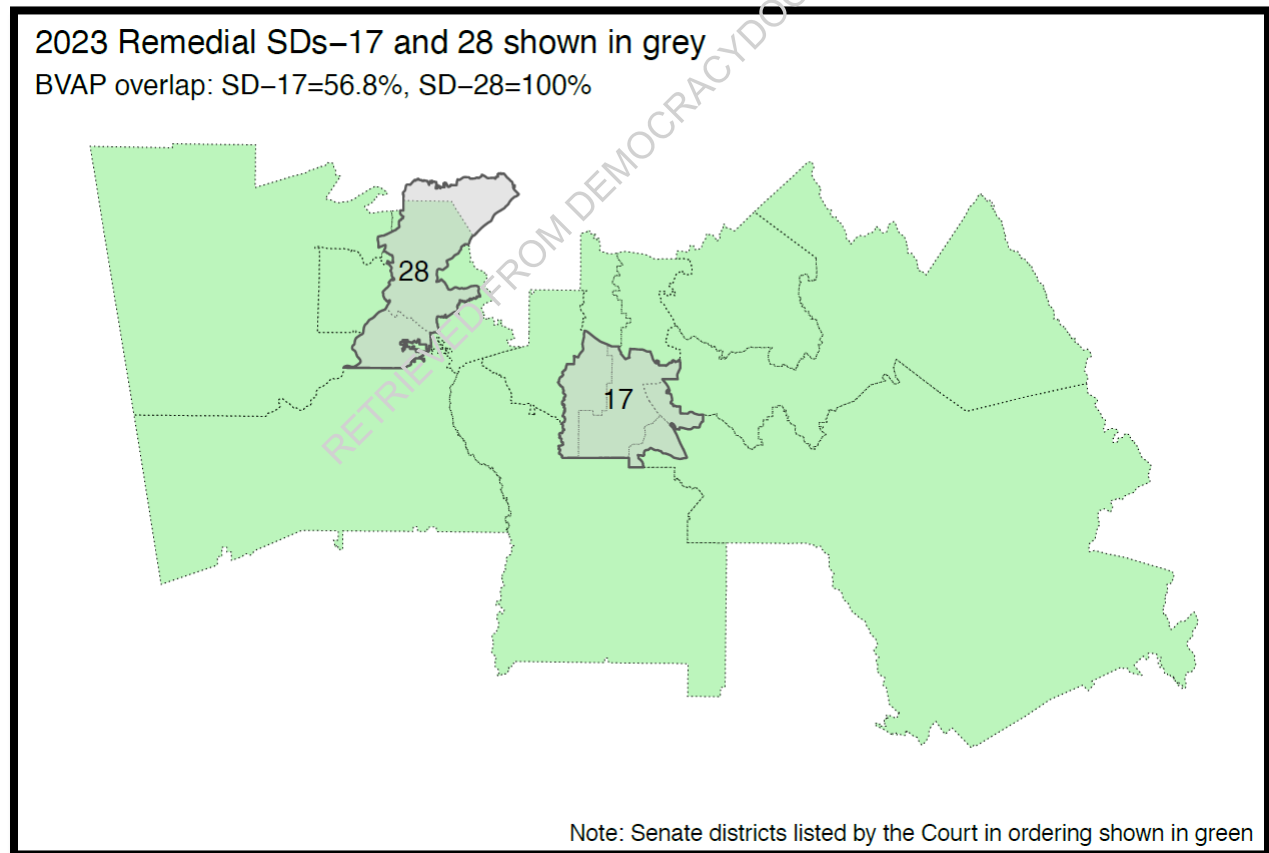
in part, by drawing a new majority-Black District 12, which “spans the Piedmont Crescent” of the state. 517 U.S. at 917. More specifically, the district was anchored in the *north* central part of the state and emanated outward to the *west* and finally settled in the southwestern portion of the state:



In other words, the district at issue in that case *never* even touched the area identified as having the voting-rights violation. In fact, it quite studiously avoided it. For this reason, the *Shaw* court found the “black voters of the south-central to southeastern region would still be suffering precisely the same injury that they suffered before District 12 was drawn.” *Id.* The remedial plans before the Court here could scarcely be more distinguishable.

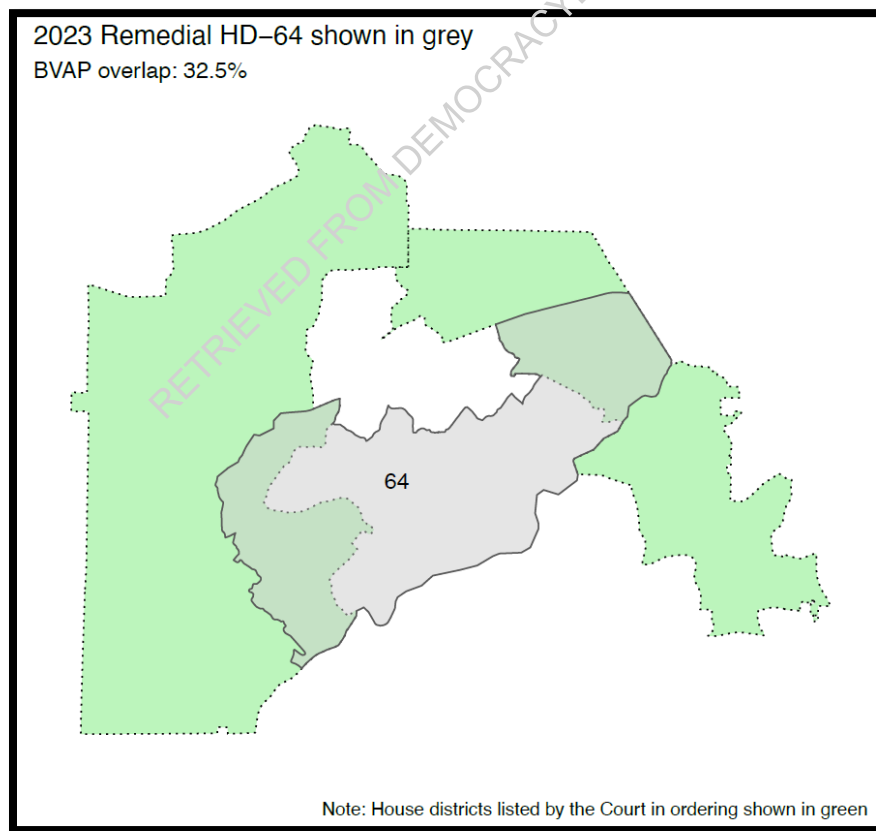
2. *The new majority-Black districts are all in the areas defined by the Court.*

Even if Plaintiffs are correct and the legislature was limited to the enumerated districts for drawing new majority-Black districts, the evidence before the Court demonstrates that the new districts are drawn primarily within the areas and districts identified by the Court. Barber Report, §§ 3.4, 4.4–4.6. Unlike the situation in *Shaw*, each district includes significant areas from the districts identified by the Court in its ordering paragraphs. That is true of the Senate plan:



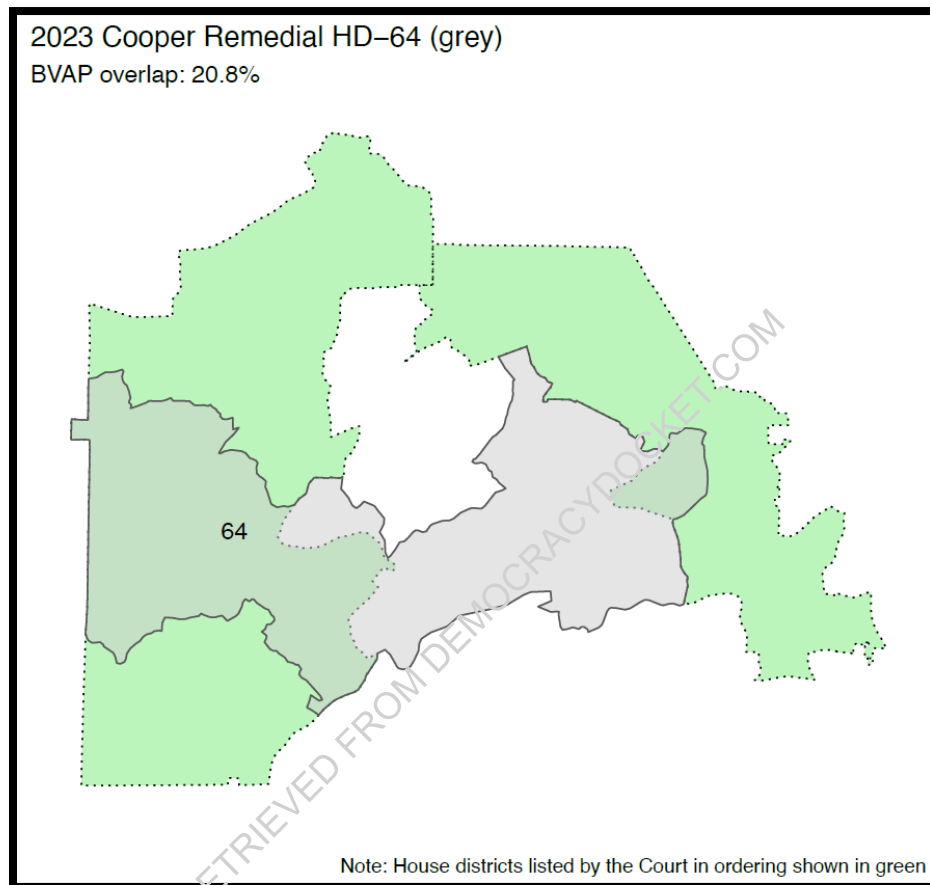
Barber Report, p. 19.

That is also true of the various House districts—and visual inspection demonstrates that the lack of overlap is primarily the result of Plaintiffs not including existing majority-Black districts in their list of districts in their Complaints, when those districts would certainly have to be modified in any plan—and were modified by Plaintiffs in their illustrative plans. For example, the “hole” around District 64 where Plaintiffs claim the General Assembly went outside of the defined area is where existing majority Black districts were located, when obviously those districts would be reconfigured when creating new majority-Black districts:



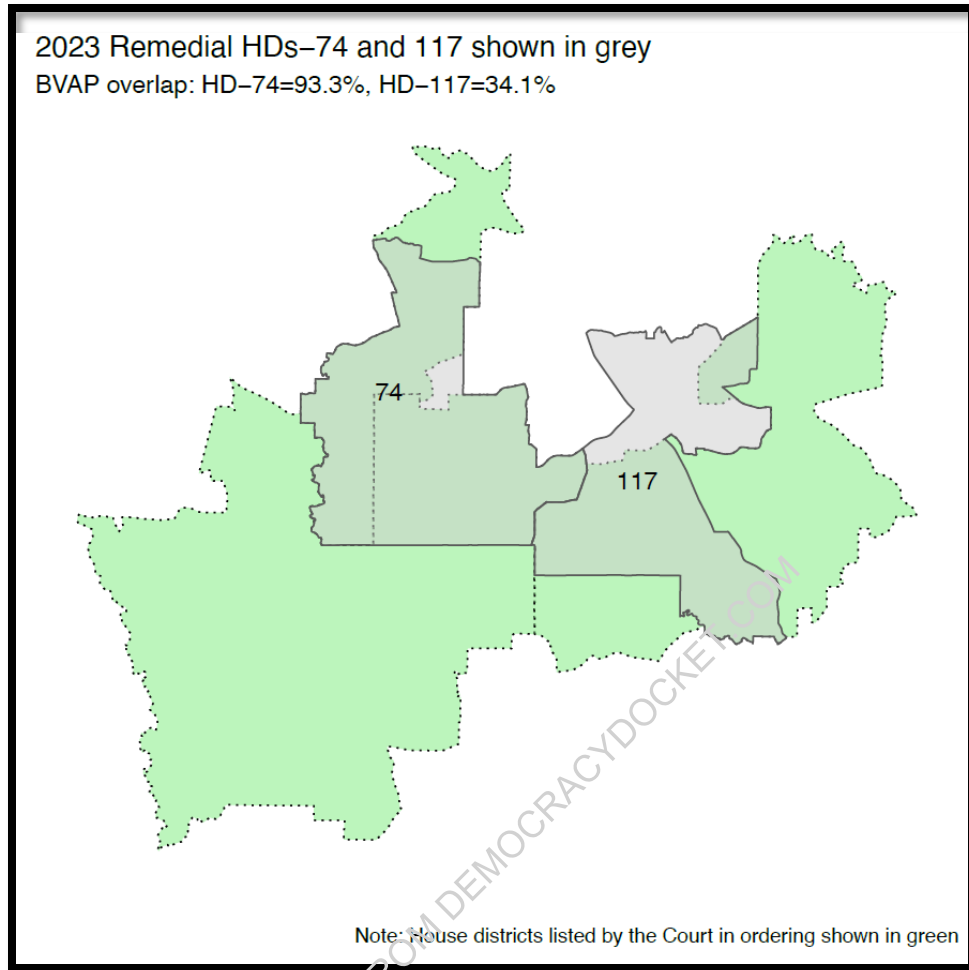
Barber Report, p. 32.

Further, Mr. Cooper made a similar change in his new proposed remedial plan in the same area, which actually includes even fewer Black voters from the specified districts as a percentage than the enacted remedial plan:

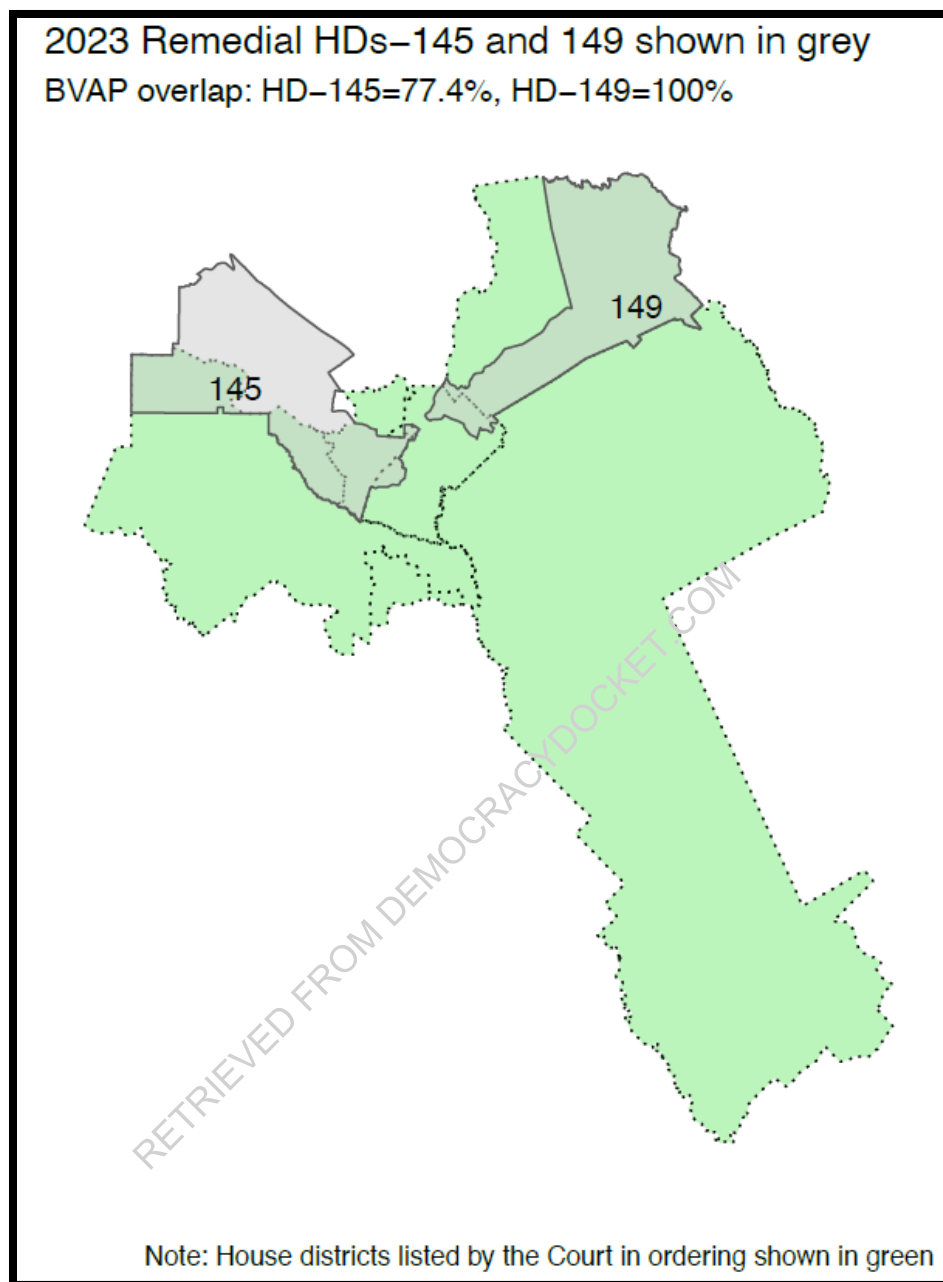


Barber Report, p. 32.

The south metro and Macon areas show the same reality—the new districts are drawn in the areas the Court identified:



Barber Report, p. 34.



Barber Report, p. 37.

Plaintiffs' claims that the vote dilution the Court found is not remedied cannot withstand scrutiny because the General Assembly added the new majority-Black districts in the areas specified.

If Plaintiffs’ approach is correct, holding a special session of the General Assembly was little more than a box-checking exercise to get to a court-drawn plan. But Plaintiffs ignore binding precedent: the General Assembly, as a political branch, is permitted to and did take far more into account than this Court when drawing districts. *Abbott v. Perez*, 138 S. Ct. 2305, 2324 (2018).

B. The General Assembly must take more into account than the Court or Plaintiffs’ experts when creating remedial plans.

As this Court already recognized, “redistricting and reapportioning legislative bodies is a legislative task [which] the federal courts should make every effort not to preempt.” Order, p. 509 (quoting *Wise*, 437 U.S. at 539). When assessing a district plan, this Court must recognize “the complex interplay of forces that enter a legislature’s redistricting calculus.” *Abbott*, 138 S. Ct. at 2324 (quoting *Miller v. Johnson*, 515 U.S. 900, 915-16 (1995)). The legislature’s adopted remedial plans not only comply with the Court’s Order, but also reflect “a variety of political judgments about the dynamics of an overall electoral process that rightly pertain to the legislative prerogative of the state and its subdivisions.” *McGhee v. Granville Cty.*, 860 F.2d 110, 115 (4th Cir. 1988).

Thus, despite Plaintiffs' hyperbole about the remedial plans,⁸ this Court must presume the good faith of the legislature when evaluating the remedial plans. *Abbott*, 138 S. Ct. at 2324-25. And “[p]rinciples of federalism and common sense mandate deference to a plan which has been legislatively enacted.” *Tallahassee Branch of NAACP v. Leon Cty.*, 827 F.2d 1436, 1438 (11th Cir. 1987).

1. *Plaintiffs insisted repeatedly that illustrative plans were only illustrative, but now say they are mandatory.*

APA Plaintiffs' position at trial was that their illustrative plans were, as labeled, merely illustrative and that the legislature would have the opportunity to draft its own plans in case of a violation. *See, e.g.*, Trial Tr. at 235:8–237:9. But now that the General Assembly has undertaken that task, all Plaintiffs have abruptly changed course and essentially argue that their illustrative plans are mandatory, because individuals who were included in a majority-Black district on their illustrative plan are not included in a majority-Black district on the remedial plans. [Pendergrass Doc. 317, p. 8-9]; [APA Doc.

⁸ Plaintiffs repeatedly claim the legislature “defied” this Court’s order; *Pendergrass* Plaintiffs refer to the legislature’s actions as “reprehensible,” [Pendergrass Doc. 317, p. 23]; and Plaintiffs accuse Georgia of acting like Alabama. Rep. Leverett remarked that the accusation that Georgia was acting like Alabama “is really a low blow” when a similar charge was made in the legislative debate because his “goal this whole session has been to – to do just not what they did, to do everything the opposite from what they did.” Ex. I at 67:12–68:3.

354, p. 21]; [Grant Doc. 317, p. 9]. But that is not the law and not what the Court ordered.

Again, a Section 2 claim is based on a *region* where vote dilution is occurring, not a right of every single Black individual to be placed into a majority-Black district. *Shaw*, 517 U.S. at 917 n.9. Adopting an interpretation of Section 2 that requires every Black voter in a region to be placed into a majority-Black district is constitutionally suspect and not at all required by Section 2. Indeed, courts expect some members of challenged minority groups to be left outside majority-minority districts on remedial plans. *See Shaw*, 517 U.S. at 917 n.9; *McGhee*, 860 F.2d at 118–119 (collecting cases).

Further, Plaintiffs complain about changes made to other districts after the legislature added the required majority-Black districts. But at trial, APA Plaintiffs objected when Defendant attempted to cross-examine their experts on changes made to other districts on the illustrative plans. Trial Tr. 234:12–235:6; 270:19–271:21; 274:4–14; 275:23–276:13. While earlier objecting to the level of scrutiny of their illustrative plans, Plaintiffs now seek to apply a new standard to the remedial plans. But, as discussed above, the changes made to other districts was thoughtful and part of the General Assembly’s entire process for considering the new plans.

2. *The General Assembly may take partisanship into account in its remedial plans.*

Contrary to APA Plaintiffs' arguments, the General Assembly is free to take partisanship into account when drawing a remedial plan. This Court already found the legislature had partisan motives in the creation of the 2021 plans, and the chairs clearly indicated they considered election returns and other partisan data as part of the creation of the remedial plans, while ensuring they were complying with the Court's Order. Order, pp. 260–62, 475–77, 489–91.

The entire point of the legislature having the first opportunity to draw a remedial plan is because it considers more factors as a political branch than a Court can. *Tallahassee Branch of NAACP*, 827 F.2d at 1438. The cases APA Plaintiffs cite offer nothing to rebut that reality. *League of United Latin American Citizens v. Perry*, 457 F. Supp. 2d 716, 721 (E.D. Tex. 2006), involved a court-drawn plan, not review of a legislatively enacted plan. *League of United Latin American Citizens v. Perry*, 548 U.S. 399, 440-41 (2006), specifically recognizes that incumbent protection can be a legitimate factor in redistricting and did not involve a remedial plan. Thus, while Plaintiffs continue to cite cases about court-drawn remedial plans, they fail to recognize that relevant precedent and basic federalism concerns permit the legislature to take a

variety of factors into account, which the evidence shows the General Assembly did in this case.

3. *The legislature is under no obligation to adopt Plaintiffs' plans.*

This may be self-evident, but Plaintiffs and this Court cannot require the General Assembly to accept the Plaintiffs' plans. This Court recognized this when it ruled that the General Assembly “has an illustrative remedial plan to *consult*” in its Order. Order, p. 515 (emphasis added). Nothing required the legislature to adopt those plans.

Plaintiffs attempt to lock in certain districts by claiming that the legislature could not alter those districts, for example in Douglas County. [Grant Doc. 317, pp. 10-11]. But they can only claim that the population of particular new majority-Black districts lives “outside of the vote-dilution area” because they removed districts that were already majority-Black from their defined list of districts in their Complaints. For example, looking at House District 64 shows that Plaintiffs claim a significant amount of population from outside the list of districts they created, but only because they artificially excluded most of the population of Douglas County—population that must change in the creation of the district, as Mr. Cooper did when creating another proposed remedial district in the same area. *Id.*; Barber Report §§ 4.4, 4.5.

Further, the facts demonstrate that the legislature did consult the illustrative plans. In fact, each new majority-Black district utilizes significant population from the Plaintiffs' illustrative plans while also accounting for other traditional redistricting principles:

Remedial District	Illustrative District	% Total Pop in Remedial from Illustrative	% Total BVAP in Remedial from Illustrative
CD-6	Cooper CD-6	72.5%	80.8%
SD-17	Esselstyn SD-25	78.6%	76.6%
SD-28	Esselstyn SD-35	52.6%	55.8%
HD-64	Esselstyn HD-61	54.7%	52.2%
HD-74	Cooper HD-74	80.8%	81.8%
HD-117	Esselstyn HD-117	69.2%	70.2%
HD-145	Esselstyn HD-142	57.8%	59.1%
HD-149	Esselstyn HD-149	57.2%	64.3%

Data from Barber Report, §§ 2.4, 3.5, 4.4, 4.5, 4.6.

The General Assembly was aware of the particular districts this Court relied on in its Order, and Ms. Wright loaded Plaintiffs' illustrative districts into her mapping software as she prepared to draw the plans to review them. Wright Dec. ¶ 11. Again, the General Assembly complied with this Court's Order.

C. The remedial plans solve the violations the Court found because they add the required districts in the regions identified by the Court.

Plaintiffs do not seriously contest *whether* the new majority-Black districts were drawn because they cannot. *Grant* Plaintiffs' experts Dr. Palmer and Mr. Esselstyn even agree that the Senate remedial plan includes two

additional performing majority-Black districts and that the House remedial plan includes five additional performing majority-Black districts. [Grant Doc. 317-1, ¶¶ 11, 31]; [Grant Doc. 317-2, pp. 2–3].

The remedial Congressional plan goes from two AP Black VAP majority districts to four. Barber Report, § 2.2. The remedial state Senate plan goes from 14 AP Black VAP majority districts to 16 (28.6% of the 56 Senate districts). Barber Report, § 3.2. The remedial state House plan goes from 49 AP Black VAP majority districts to 54 (30% of the 180 House districts). Barber Report, § 4.2. And the legislative plans both reduce the number of majority-white districts by the same amount and do not eliminate any existing majority-Black districts. Beyond complaining that the districts are not drawn within their list of districts,⁹ Plaintiffs do not contest that the new majority-Black districts are drawn where they are supposed to be drawn. That is sufficient to end the analysis. Unhappy with that result, Plaintiffs next propose a variety of additional possible ways to measure compliance, none of which apply here.

⁹ Plaintiffs’ own remedial and illustrative plans also make changes outside of the “vote dilution area” as they call it, with the clearest example being Mr. Cooper’s remedial plans, which change significant areas outside of the list of districts. Barber Report, §§ 4.4, 4.5.

1. *The correct calculation is not the “net” amount of Black voters that moved because the Court did not order that as a remedy.*

APA Plaintiffs propose a system of how many Black *voters* moved in and out of majority-Black districts as the method to measure compliance. [APA Doc. 354, pp. 18–19]. But this is not what the Court required. The mission for the General Assembly was not to ensure that every Black *voter* who was not previously in a majority-Black district would be moved into such a district. The mission was to draw the majority-Black *districts* this Court required in its Order.

And the result of that drawing means that more Black individuals of voting age will now be included in majority-Black districts. Barber Report, §§ 2.3, 3.3, 4.3. While complaining that there was a reshuffling of Black voters from existing majority-Black districts, Plaintiffs ignore the fact that their own illustrative plans also moved Black voters from existing majority-Black districts into new majority-Black districts—indeed, Plaintiffs’ whole theory throughout this litigation was that the General Assembly had improperly grouped Black voters together, when they should have been separated to create additional majority-Black districts.

Thus, Plaintiffs’ claims of a “shell game” are actually an indictment of their own approach. Having persuaded this Court that new majority-Black *districts* were required, they now propose to move the goalposts to require that

particular Black *voters* must be moved into and out of districts to ensure a political outcome. That is not what the Voting Rights Act nor this Court requires.

2. *The General Assembly moved existing districts north, while Plaintiffs moved existing districts south.*

Plaintiffs recognize that the legislature shifted districts north instead of south once the new majority-Black districts were added. [APA Doc. 354, p. 19]. That is exactly what the chairs explained happened in the metro Atlanta area, which resulted in the collapse of majority-white districts north of the new majority-Black districts. *See* Ex. C at 9:6–14, 16:18–25, 18:6–17; Ex. D. at 23:2–4, 29:24–30:12. This is logical because adding new majority-Black districts on a plan requires eliminating districts somewhere else. Plaintiffs criticize this approach for an obvious reason—the majority-white districts that were eliminated were electing Democratic candidates.

Plaintiffs also relied extensively at trial on the increase in Black voters in Georgia and in metro Atlanta, but now again switch their arguments and claim that only Black voters in certain areas can be considered to be moved into majority-Black districts in the remedial plan. *See, e.g.*, [APA Doc. 354, p. 19]; [Grant Doc. 317, p. 14]; [Pendergrass Doc. 317, pp. 8–9]. Again, the General Assembly’s charge was to draw new majority-Black districts, which

necessarily requires including Black voters, including those who were not previously in majority-Black districts.

At the end of the day, the remedial plans ensure that Black voters in Georgia are more likely to be in a majority-Black district both statewide and in the districts listed by the Court in its Order than they were previously.

3. *Plaintiffs offer no plan that complies with the General Assembly’s policy goals on the enacted plans while also drawing any additional majority-Black districts.*

While APA Plaintiffs offer brand-new remedial plans, no Plaintiff group offers any plan that starts with the legislature’s policy decisions and goals, including its partisan goals, and then draws the additional majority-Black districts. Rather, all of Plaintiffs’ proposed plans eliminate Republican districts, which is inconsistent with the General Assembly’s legitimate partisan goals. Thus, there is no basis for this Court to consider plans that lack the necessary deference to legislative bodies. *Tallahassee Branch of the NAACP*, 827 F.2d at 1438.

4. *APA Plaintiffs claim some districts are packed when they are within the same thresholds of districts on the 2021 plans that were not challenged.*

APA Plaintiffs also claim that some House districts become “packed” on the remedial House plan. [APA Doc. 354, p. 25]. But the BVAP percentages for all the districts on the remedial plan are within the same range as the districts on the 2021 plan, including districts that were not challenged. Barber Report,

§ 4.2, Table 9. Thus, even if this Court had found packing in particular places, the districts are still within the acceptable range from the 2021 House plan.

D. This Court should not engage in a “beauty contest” with any other plans offered by Plaintiffs.

Finally, Plaintiffs question the General Assembly’s decision-making by proposing a “beauty contest” of the remedial plans versus their plans, claiming the General Assembly could have moved fewer voters or changed compactness scores in ways they prefer. [APA Doc. 354, p. 21]; [Grant Doc. 317, pp. 18-20].

1. Comparisons to brand-new illustrative plans are inappropriate at this stage (APA).

First, the APA Plaintiffs cite no authority for the submission of new plans from Mr. Cooper as alternatives to the 2023 plans, and it is improper for this Court to consider these plans as part of Plaintiffs’ objections. The issue before the Court now is whether the remedial plans comply with the Court’s Order. Only if the Court finds that one or more of the 2023 plans does not comply should there be consideration of alternative plans, whether from a Special Master or otherwise. As long as the 2023 plans comply with the Court’s Order by remedying the Section 2 violations the Court found, it does not matter that Mr. Cooper has created allegedly “better” plans. *Cf. Singleton v. Allen*, No. 2:21-cv-1291-AMM, 2023 U.S. Dist. LEXIS 155998, at *99 (N.D. Ala. Sept. 5, 2023) (no basis for “beauty contest” between valid plans).

At the liability stage of the APA case, Mr. Cooper produced illustrative plans, was deposed on them, and was examined on them extensively at trial. Plaintiffs should not be allowed to submit new plans for Mr. Cooper as alternatives to the 2023 plans, because (in fairness to Defendant) this would require essentially a second trial as to the lawfulness of Mr. Cooper's new plans and risk the exact "infinity loop" that the three-judge court in *Singleton* sought to avoid, *see Singleton*, 2023 U.S. Dist. LEXIS 155998, at *152, as well as causing further delay in the implementation of new maps when time is of the essence.

While Plaintiffs may believe certain changes were "unnecessary," that does not automatically mean the General Assembly's decision-making violates the Constitution or the VRA. And that is the only standard that matters—not whether Plaintiffs would have drawn districts differently if they were a majority of the General Assembly. *McGhee*, 860 F.2d at 115.

2. *Comparisons to illustrative plans are inappropriate at this stage (APA/Grant/Pendergrass).*

Further, this Court should not compare the remedial plans to the illustrative plans on other metrics because of the General Assembly's wide latitude for complying with this Court's Order. To be clear, the Court is not required to conduct a "beauty contest" between the 2023 remedial plans and Plaintiffs' illustrative plans. *See Allen v. Milligan*, 143 S. Ct. 1487, 1505 (2023).

“When evaluating a defendant’s proposal, a court is not to inquire whether the defendants have proposed the very best available remedy, or even whether the defendants have proposed an appealing one.” *United States v. Euclid City Sch. Bd.*, 632 F. Supp. 2d 740, 750 (N.D. Ohio 2009). The Court’s “analysis in the first instance” is limited to whether the remedial plans correct the Section 2 violation that the Court previously found. If the remedial plans correct that violation, then the Court may consider any claims by Plaintiffs that the remedial plans “violate[] federal law anew.” *Singleton*, 2023 U.S. Dist. LEXIS 155998, at *140. That is why comparisons to compactness scores or other metrics are inappropriate at this stage—the only question is whether the remedial plans comply with this Court’s Order and other binding precedent.

II. The remedial plans do not eliminate existing minority opportunity districts (APA/Grant/Pendergrass).

Faced with the reality that the remedial plans retain all existing majority-Black districts from the 2021 plans and add the required majority-Black districts where the Court directed, Plaintiffs spend most of their objection briefs alleging that the State failed to comply with another part of this Court’s instructions—the requirement not to eliminate any existing minority opportunity districts. But the General Assembly also fully complied with this portion of the Court’s Order.

A. The remedial plans increase the number of majority-Black districts and do not eliminate any existing majority-Black districts (*APA/Grant/Pendergrass*).

As shown by Dr. Barber's report, the remedial plans increase the number of majority-Black districts and do not eliminate any existing majority-Black districts elsewhere in the plans. Barber Report, §§ 2.2, 3.2, 4.2. Instead, in the legislative plans there is a corresponding decrease in majority-white districts and in the Congressional plan, there is a decrease in non-majority-Black districts. Significantly, the legislative plans do not eliminate any district where minority voters constituted a majority of the voting-age population.

Despite Grant Plaintiffs' attempts to re-imagine this Court's instructions [Grant Doc. 317, p. 15], this Court did not give the same instruction as the *Singleton* court. Instead, this Court clearly required additional *majority-Black districts*, which the General Assembly has created. Thus, under the definition of minority opportunity district that is most logical based on this Court's ruling and discussion of opportunity districts in this case, *see, e.g.*, Order, pp. 106, 145–46, 211, 268, 417–20, 427, and 511, no existing minority opportunity districts—that is, no majority-Black districts—were eliminated in any of the remedial plans. That should end the analysis of the legislature's compliance on that point.

Further, the legislative plans have the same number of districts that are majority-minority, but not majority-Black, as the 2021 enacted plans. Barber

Report, §§ 3.2, 4.2. This means the change in the legislative plans is a reduction in the number of majority-white districts. And none of the remedial plans decrease the number of majority-Black districts. All of them increase that number.

But that is not enough for all Plaintiffs and Amici except for the *APA* Plaintiffs. Instead, they propose at least three different definitions of “minority opportunity districts,” none of which are appropriate under Section 2, any binding cases, or the facts of these cases.

B. Crossover districts are not required by Section 2 or binding precedent (*Grant*).

Grant Plaintiffs argue that the proper definition of “minority opportunity district” is a crossover district, where white voters and Black voters vote for the same candidates. [Grant Dec. 317, p. 16]. They then propose that a series of five districts, four of which were majority-white, are protected by the VRA because they were previously electing Democratic candidates but now will elect Republican candidates. *Id.* at 16–17. Not only is the dismantling of majority-white districts something to be expected when this Court ordered the creation of new majority-Black districts, but Plaintiffs’ arguments about crossover districts are not supported by any legal theory.

Plaintiffs admit, as the Supreme Court explained in *Bartlett v. Strickland*, 556 U.S. 1 (2009) (plurality op.), that “as a statutory matter, § 2

does not mandate creating or preserving crossover districts.” *Id.* at 23. This is because crossover districts cannot satisfy the majority-minority rule required under the first *Gingles* precondition:

Minority groups in crossover districts cannot form a voting majority without crossover voters. In those districts minority voters have the same opportunity to elect their candidate as any other political group with the same relative voting strength.

Id. at 20. If this Court concludes, as Plaintiffs request, that majority-white districts are somehow protected by Section 2 or that the General Assembly could not dismantle them as part of compliance with the Court’s Order, it would guarantee Black voters an electoral advantage which is neither a “wrong” under the Voting Rights Act nor a valid remedy. *Id.* at 15.

Crossover districts are also not protected by the VRA because it would be “difficult to see how the majority-bloc-voting requirement” of the third *Gingles* precondition would be satisfied “where, by definition, white voters join in sufficient numbers with minority voters to elect the minority’s preferred candidate.” *Id.* at 16. Yet this is precisely what the *Grant* Plaintiffs ask this Court to do when they ask this Court to consider crossover districts to be “minority opportunity districts.” [Grant Doc. 317, p. 17]. They seek to insulate

these districts solely based on the fact that they currently elect Democratic members to the General Assembly.¹⁰

If crossover districts are not required or protected under federal law, as Plaintiffs concede, then this Court cannot order their creation or preservation even if it is attached to some other relief ordered pursuant to a demonstrated Section 2 violation. “Federal courts are barred from intervening in state apportionment in the absence of a violation of federal law precisely because it is the domain of the States, and not the federal courts, to conduct apportionment in the first place.” *Voinovich*, 507 U.S. at 156. That means this Court cannot order the State to protect a district for which federal law does not otherwise mandate protection. “[T]he federal courts are bound to respect the States’ apportionment choice unless those choices contravene federal requirements.” *Id.* at 156–57.

In the end, “[n]othing in § 2 grants special protection to a minority group’s right to form political coalitions.” *Bartlett*, 556 U.S. at 15. This is because Section 2 is not a guarantee of political success—“minority voters are not immune from the obligation to pull, haul, and trade to find common

¹⁰ Indeed, as discussed below, interpreting the VRA to protect political parties rather than membership in a minority group is an unconstitutional interpretation of the VRA because it means it is no longer congruent and proportional to address equal political opportunity for Black voters. *See City of Boerne v. Flores*, 521 U.S. 507, 518 (1997).

political ground.” *Johnson v. De Grandy*, 512 U.S. 997, 1020 (1994). If this Court finds that crossover districts are “minority opportunity districts,” then it is requiring the legislature to protect political coalitions rather than ensuring the equality of Black electoral opportunities. Protecting political coalitions would violate Section 2 because nothing in Section 2 requires legislatures to draw election districts in such a manner as “to give minority voters the **most potential** or the **best potential**, to elect a candidate,” as Plaintiffs are requesting here. *Bartlett*, 556 U.S. at 15 (emphasis added). Instead, as this Court correctly found, it only requires new opportunity districts that are majority-Black when a violation is shown. Order, pp. 509–11. Proceeding as the *Grant* Plaintiffs urge would place this Court in “the untenable position of predicting many political variables and tying them to race-based assumptions,” which courts are not permitted to do and which this Court has already expressly said it would not do. *Bartlett*, 556 U.S. at 17–18; Order, pp. 240–42.

Thus, the legislature is not prevented by Section 2 or by this Court’s Order from eliminating existing majority-white districts to create majority-Black districts—indeed, there is no other way it could have complied with the Order.

C. Coalition districts are not required by Section 2, binding precedent, or the facts of these cases (*Pendergrass*).

Pendergrass Plaintiffs argue that the term “minority opportunity district” instead protects coalition districts—that is, districts where the total number of non-white voters is more than 50%. [Pendergrass Doc. 317, pp. 10–12]. But this is not required by Section 2. And even if it was, *Pendergrass* Plaintiffs have not presented evidence of a viable political coalition here.

Further, while claiming that “minority opportunity district” means “coalition district,” *Pendergrass* Plaintiffs also ignore this Court’s discussion of enacted Congressional District 7. In the Order, this Court did not call enacted Congressional District 7 a minority opportunity district, but rather referred to it as a “majority-minority district.” Order, p. 255. And *Pendergrass* Plaintiffs’ reliance on *League of United American Citizens v. Perry*, 548 U.S. 399 (2006) (*LULAC*), does not help them here. [Pendergrass Doc. 317, p. 9]. In *LULAC*, the district at issue had been 57.5% majority-Latino before redistricting. 548 U.S. at 427. Congressional District 7 under the 2021 plans was not majority-Black (or majority of any single race), and *Pendergrass* Plaintiffs did not introduce evidence at trial of voting patterns of non-Black minorities in enacted Congressional District 7. There is no basis for this Court to conclude that coalition districts are “minority opportunity districts.”

1. *Coalition districts are not required by or protected under Section 2 of the VRA.*

Beginning with the text of Section 2, it expressly protects “members of *a class* of citizens” and “members of *a protected class*.” 52 U.S.C. § 10301(b) (emphasis added). Both references are to a singular class of citizens, not to multiple classes of citizens who happen to be politically aligned. Similarly, paragraph (a) prohibits voting practices that result “in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color,” 52 U.S.C. 10301(a), which ties the protections of Section 2 to membership in a particular racial group, not in a coalition of races. *See also Nixon v. Kent Cty.*, 76 F.3d 1381, 1386 (6th Cir. 1996) (en banc). From the text alone, it is clear that Section 2 protects opportunities for single racial groups, not combinations of various groups.

Further, the continuing development of Section 2 law shows that coalition claims are not valid. As discussed above, *Bartlett* explained that crossover districts are not required, in part because there is no “special protection to a minority group’s right to form political *coalitions*.” 556 U.S. at 15 (emphasis added). The Sixth Circuit has completely rejected coalition-district claims under Section 2. *Nixon*, 76 F.3d at 1386. And while the Fifth Circuit previously authorized coalition district claims, it is currently

considering whether to overturn its precedent *en banc*. *Petteway v. Galveston Cty.*, 86 F.4th 214, 218 (5th Cir. 2023).

The only Eleventh Circuit precedent on this point was a statement in introductory language in *Concerned Citizens of Hardee Cty. v. Hardee Cty. Bd. of Comm'rs*, 906 F.2d 524, 526 (11th Cir. 1990). That statement was not part of the holding of the case because the plaintiffs in that case presented no evidence of cohesion and because the statement was only in the explanation of the *Gingles* preconditions section, not the analysis. *Id.* As a three-judge panel in this district recently concluded, the Eleventh Circuit's "assertion about coalition districts was dicta." *Ga. State Conference of the NAACP v. Georgia*, Civil Action No. 1:21-cv-05338-ELB-SCJ-SDG, 2023 U.S. Dist. LEXIS 192070, at *47 (N.D. Ga. Oct. 26, 2023) (three-judge court) (citing *Pretka v. Kolter City Plaza II, Inc.*, 608 F.3d 744, 762 (11th Cir. 2010)).

Thus, the text of Section 2 exclusively contemplates individual minority groups as falling within its purview. And under all binding precedent, the existence of coalition-district claims as a remedy under Section 2 is—at best—“something of an open question.” *Ga. State Conference of the NAACP*, 2023 U.S. Dist. LEXIS 192070, at *46. In light of the unambiguous text of Section 2, this Court should resolve that question against coalition districts. At the very least, there is not sufficient law to rely on to determine that a coalition of minority

voters would be sufficient under the first *Gingles* precondition to show a Section 2 violation.

2. *Plaintiffs have presented no evidence of minority voters forming coalitions that are protected.*

But even if coalition districts could be a valid showing for the first *Gingles* precondition, Plaintiffs have not presented sufficient evidence here because they have presented no evidence that Black, Latino, and Asian voters are cohesive in any context except in general elections. [Pendergrass Doc. 317-2, p. 2]; Barber Report, § 2.2. Thus, Plaintiffs have presented no evidence that shows that Black, Latino, and Asian voters support the same candidates when partisanship is not a factor. They can only show that these racial groups support Democratic candidates in the general election.

Without primary data, Plaintiffs have not presented any evidence that the cohesion they say exists is anything more than partisan political behavior by voters. Without this data, there is no proof of things like situations where “hispanic voters supported and worked for black candidates” or any evidence that Asian voters, Latino voters, and Black voters “worked together and formed political coalitions.” *Concerned Citizens of Hardee Cty.*, 906 F.2d at 527.

Further, *Pendergrass* Plaintiffs must rely on a coalition of Black, Latino, and Asian individuals, because the Black and Latino CVAP numbers without Asian citizens in the enacted Congressional District 7 are below 50%.

Pendergrass PX-1 (Cooper Report), Ex. K-1 (p. 119); Barber Report, § 2.2. Only by adding Asian citizens does the analysis push the minority citizen voting age population of enacted Congressional District 7 over 50%. Barber Report, § 2.2. But, as discussed below, *Pendergrass* Plaintiffs have not presented evidence on many points for Asian voters, including evidence of historical discrimination or socioeconomic status disparities that affect Asian voters.

Further, making changes to Congressional District 7, even if it was a functioning coalition district, does not “offset” minority gains in one part of the state with losses in another. [Pendergrass Doc. 317, pp. 10-11]. Not only are the changes made to create the required new majority-Black district primarily in metro Atlanta instead of across the state, the Supreme Court has still only ever considered questions of offsets with a single race of voters, not coalitions. *De Grandy*, 512 U.S. at 1019. And there is no question that the remedial plans add opportunities for Black voters, which is what this Court required.

D. Districts which elect Democrats are not required by Section 2 or binding precedent (*Amici/APA/Grant/Pendergrass*).

Finally, Amici from the three-judge panel cases offer a third possible definition of “minority opportunity district,” which is a district which reliably

elects a Democrat. *See* [APA Doc. 363,¹¹ pp. 12-13]. To illustrate how difficult it is to make this case even from decisions of other trial courts, Amici place the bracketed word “[minorities]” in their quote from *Wright v. Sumter Cty. Bd. of Elections & Registration*, No. 1:14-CV-42 (WLS), 2020 U.S. Dist. LEXIS 17348, at *12 (M.D. Ga. Jan. 29, 2020), to replace the phrase “African Americans in Sumter County” in that quote. This sleight-of-hand effectively rewrites the meaning of the quoted passage. Amici also misread this Court’s Order—it did not require “drawing *additional* Black opportunity districts” in a political-performance sense, [APA Doc. 363, p. 12]. Instead, this Court required “additional majority-Black . . . districts.” Order, p. 509.

In contrast to the Court’s requirements, Amici’s definition of “effective for Black voters” refers solely to districts that elect Democrats. [APA Doc. 363-1, p. 7]. While Amici include some primary data from 2018 in an attempt to avoid relying exclusively on general-election data, they only identify a single district where they claim there is a divergence between primary and general election performance.¹² *See* [APA Doc. 363-1, pp. 5–6]. In other words, Amici simply re-imagine this Court’s Order to require political coalitions, *Bartlett*,

¹¹ The Court authorized Amici to file the same brief in all three cases. It was filed at [APA Doc. 363], [Grant Doc. 321], and [Pendergrass Doc. 322]. For ease of reference, this brief refers to the APA docket numbers.

¹² This approach is in sharp contrast to the parties to these cases, who offer no primary data at this stage.

556 U.S. at 26, and then use the phrases “Black-preferred” and “white-preferred” to refer to Democrats and Republicans, respectively. [APA Doc. 363-1, pp. 5-6].

Not only does reading Section 2 to require protection of political coalitions violate *Bartlett*, it also would make Section 2 unconstitutional because it would no longer be congruent and proportional to addressing equal political opportunity for Black voters. *See City of Boerne*, 521 U.S. at 518. This Court should reject a definition of “minority opportunity district” that is designed to ensure Democratic political performance through the VRA.

III. SB 3EX does not independently violate Section 2 of the VRA (*Pendergrass*).

Faced with the full compliance of the General Assembly with this Court’s Order, *Pendergrass* Plaintiffs launch one final line of attack—that the prior Congressional District 7 is required by Section 2 and thus any changes to its boundaries is itself a violation of Section 2. [Pendergrass Doc. 317, pp. 14–27].

Initially, finding a Section 2 violation on 12 pages of briefing and a handful of exhibits on an expedited basis without the opportunity for discovery, cross-examination or any other procedural protections defies the required “intensely local appraisal” this Court must carry out in the context of Section 2, especially on claims that have never been raised in this case. *Wright*, 979

F.3d at 1288. But even if this Court considers the merits of Plaintiffs' claims, their claim of a separate Section 2 violation fails.

A. There is no sufficiently large and geographically compact minority group that constitutes a majority in enacted Congressional District 7 (first *Gingles* precondition).

In order to find that numerosity of minority voters exists in enacted Congressional District 7, *Pendergrass* Plaintiffs must rely on a connections among three separate minority groups. [Pendergrass Doc. 317, p. 15]. Using the CVAP metric Plaintiffs rely on, they cannot reach a majority without including Asian voters, as shown by Mr. Cooper's expert report in this case, which shows the total Black and Latino CVAP in enacted Congressional District 7 is 43.64% using the highest metrics.

District	% NH Single-Race Black CVAP*	% NH DOJ Black CVAP**	% Latino CVAP	% SR NH White CVAP
001	29.16%	29.67%	4.49%	63.10%
002	49.55%	50.001%	3.17%	44.62%
003	22.53%	22.86%	3.38%	71.12%
004	57.71%	58.46%	3.98%	32.82%
005	51.64%	52.35%	3.48%	39.75%
006	9.72%	10.26%	5.63%	76.60%
007	31.88%	32.44%	11.20%	43.69%
008	30.46%	30.76%	3.79%	63.40%
009	10.03%	10.34%	7.35%	77.37%
010	22.11%	22.56%	4.06%	70.80%
011	17.57%	18.30%	6.28%	71.12%
012	36.60%	37.19%	3.39%	56.94%
013	66.36%	67.05%	5.80%	23.21%
014	13.19%	13.71%	6.20%	78.21%

Pendergrass PX-1 (Cooper Report), Ex. K-1 (p. 119); *see also* Barber Report, § 2.2. Despite the necessity of including Asian voters, the *entirety* of *Pendergrass* Plaintiffs’ evidence for this sweeping three-part political coalition is the election analysis of Dr. Palmer and the testimony of a single individual before a legislative committee. [Pendergrass Doc. 317, pp. 17-18].

For all the reasons outlined in Section II.C. above, coalition districts are not required by Section 2. But even if they are, for purposes of the first *Gingles* precondition, *Pendergrass* Plaintiffs have presented no evidence of situations where “hispanic voters supported and worked for black candidates” or any evidence that Asian voters, Latino voters, and Black voters “worked together and formed political coalitions,” *Concerned Citizens of Hardee Cty.*, 906 F.2d at 527, beyond similar voting behavior in partisan general elections. This is far more akin to offering only “anecdotal testimony regarding individual instances” instead of offering data supporting coalition claims in any context that is not partisan, such as primary data. *Id.* *Pendergrass* Plaintiffs ask this Court to merely presume a coalition exists because three groups of non-white voters support Democratic candidates in general elections—that is not sufficient to meet the numerosity requirement of the first *Gingles* precondition because no majority exists otherwise.

B. The second and third *Gingles* preconditions emphasize the political nature of Plaintiffs’ claims.

Pendergrass Plaintiffs offer Dr. Palmer’s analysis of elections from 2012 to 2022 in enacted District 7 for the proposition of cohesion among voters. But while Dr. Palmer studiously avoids giving names of candidates or party affiliation of candidates, the data demonstrates that the cohesion in general elections only is in support of Democratic candidates. [Pendergrass Doc. 317-2, pp. 10-11]. But as other experts before this Court explained, primaries can be a “barrier for Black-preferred candidates.” Order, p. 151 (citing Dr. Handley’s testimony). *Pendergrass* Plaintiffs have presented no evidence that Black, Latino, and Asian voters support the same candidates in primaries or that those primary elections are not barriers for Black-preferred (or Asian-preferred or Latino-preferred) candidates.

While this Court found that concerns about partisanship are properly raised in the totality of the circumstances analysis, the unique nature of the coalition claims advanced here requires analysis at the *Gingles* preconditions stage. And this Court already concluded that drawing districts where Black voters are a majority was necessary because of racially polarized voting. Order, pp. 419–20. Without more, *Pendergrass* Plaintiffs cannot carry their burden regarding the political cohesion required under the *Gingles* preconditions by

adding all non-white voters together based solely on support for candidates in partisan general elections.

C. The totality of the circumstances does not support a finding of lack of equal openness as to a combination of Black, Latino, and Asian voters in prior Congressional District 7.

Pendergrass Plaintiffs present the entirety of their totality of the circumstances evidence in just seven pages of their brief. But that evidence cannot support a finding of a lack of equal openness as to Black, Latino, and Asian voters in the prior Congressional District 7.

1. Senate Factor 1: This Court cannot import its findings about Black voters to Latino and Asian voters.

As this Court made clear, the findings it made about the history of discrimination in these cases were about the history involving Black voters.¹³ Order, pp. 213–33. *Pendergrass* Plaintiffs now rely on an expert report from another case to establish a brand-new Section 2 claim involving coalition districts, which have never been at issue in this case. As discussed above, this Court should reject the attempt to find a coalition as a matter of law and on the *Gingles* preconditions.

¹³ Defendant has been unable to locate any reference to Asian voters or Latino voters in the Order that are unrelated to district statistics.

But even if this Court considers what *Pendergrass* Plaintiffs offer, it proves nothing about a history of discrimination as to Latino and Asian voters. *Pendergrass* Plaintiffs identify three instances with passing references to both Latino and Asian voters, the newest of which is more than a decade old. [Pendergrass Doc. 317, pp. 21–22]. They rely on Georgia citizenship-check processes, where individuals who previously provided documentary proof they were *not* citizens are asked for details if they later register to vote. This Court has already ruled that the process complies with the Constitution and with Section 2 of the VRA. *Fair Fight Action, Inc. v. Raffensperger*, 634 F. Supp. 3d 1128, 1235, 1250 (N.D. Ga. 2022). And that process is still in place despite attempts to enjoin it, while it is also currently the subject of litigation in *Georgia Coalition for the People’s Agenda v. Raffensperger*, Case No. 1:18-cv-04727-ELR (N.D. Ga.). *Pendergrass* Plaintiffs next rely on a process from 2008–2009 involving matching records that is also similar to what this Court upheld in *Fair Fight Action*. Finally, *Pendergrass* Plaintiffs cite to an 11-year-old statement by then-Rep. Stacey Abrams regarding the 2011 redistricting, which involved plans that were drawn under Section 5 of the VRA and precleared by the U.S. Department of Justice.¹⁴

¹⁴ To be clear, even under Plaintiffs’ view, the General Assembly created a coalition district on the 2021 enacted Congressional plan, undermining then-Rep. Abrams’ claims.

These three isolated instances, one of which has been upheld against almost-identical claims of racial discrimination, do not suffice to carry Plaintiffs' burden to show a history of discrimination against Latino and Asian voters in Georgia. This is a far cry from the evidence this Court relied on for the first Senate factor in its Order, which was focused on Black voters. Order, pp. 216–32.

2. *Senate Factor 2: No evidence on racially polarized voting beyond what was already presented.*

Pendergrass Plaintiffs offer no evidence at all regarding the second Senate factor, which is where this Court would analyze the potential impact of partisanship. As this Court explained, determining “whether voter polarization is on account of partisanship and race is a difficult issue to disentangle.” Order, p. 235. The same issues explained by Dr. Alford infect the analysis offered here, with no evidence by *Pendergrass* Plaintiffs of any connection between race and partisanship of Latino and Asian voters at this point in the case, unlike the evidence presented to the Court regarding Black voters. Order, p. 236–37. Further, *Pendergrass* Plaintiffs have presented no evidence regarding the success of Latino or Asian candidates based on the racial makeup of a district. Order, p. 239. And *Pendergrass* Plaintiffs have presented no evidence regarding the history of the Republican Party and Latino and Asian voters. Order, p. 241. Without any evidence on this point,

this Court cannot conclude that failing to preserve the 2021 enacted Congressional District 7 means the political processes are not equally open to Latino and Asian voters.

3. Senate Factor 3: No evidence regarding discriminatory voting practices in the jurisdiction.

Pendergrass Plaintiffs also offer no evidence regarding Senate Factor 3, or any impact of particular voting practices in the jurisdiction on Latino and Asian voters. Again, without evidence about the impact on the alleged coalition, there is no basis for a finding of a lack of equal openness.

4. Senate Factor 5: Socioeconomic indicators for Latino and Asian voters are of limited utility in this context.

For socioeconomic indicators, *Pendergrass* Plaintiffs offer a new three-page report by Dr. Collingwood, summarizing American Community Survey (ACS) data. Dr. Collingwood did not review data on Latino or Asian Georgians as part of his expert reports or testify regarding these groups in his direct trial testimony. See Trial Tr. at 692:9–15, 19–24 (09/07/23) (nothing in Dr. Collingwood’s reports about Asian-Americans in Georgia).

Dr. Collingwood’s new report has a number of flaws, especially as *Pendergrass* Plaintiffs wish to use it. First, by its terms, the data is only available at the county level and not at the district level, so this Court cannot reach conclusions about the voters who are actually within the boundaries of enacted Congressional District 7. [*Pendergrass* Doc. 317-5, p. 1].

Second, Dr. Collingwood admits in footnote 1 that he was missing data for Pacific Islanders, compared to Asian-Americans generally, thus admitting the existence of at least one subgroup within Asian-Americans for which he does not have data. [Pendergrass Doc. 317-5, p. 1 n.1]. This Court cannot assume that all Asian voters are similar. *Students for Fair Admissions v. President & Fellows of Harvard Coll.*, 143 S. Ct. 2141, 2258 (“the Asian American community is not a monolith”) (Sotomayor, J., dissenting).

Third, Dr. Collingwood’s report summarizes ACS data, which by its nature lumps multiple distinct ethnic groups together. According to the ACS page on the U.S. Census Bureau website, “People who identify with the terms ‘Hispanic’ or ‘Latino’ are those who classify themselves in one of the specific Hispanic or Latino categories listed on the American Community Survey questionnaire and various Census Bureau survey questionnaires – ‘Mexican, Mexican Am., Chicano’ or ‘Puerto Rican’ or ‘Cuban’ – as well as those who indicate that they are ‘another Hispanic, Latino, or Spanish origin.’” See <https://www.census.gov/acs/www/about/why-we-ask-each-question/ethnicity>. Thus, “Latino” is a broad category embracing numerous subgroups, and Dr. Collingwood has not attempted to account for the differences among those subgroups, instead just relying on the concept that they are all similar.

Further, the socioeconomic data he presents does not demonstrate a consistency across Latino and Asian households, with Asian individuals far

closer to (and in some cases exceeding) white socioeconomic standards he cites. For example, Dr. Collingwood's data shows that Asian individuals have higher rates of college education than whites [Pendergrass Doc. 317-5, p. 2, Table 1]. Other data shows a lack of connection with the alleged coalition, with more white individuals disabled than Asian and Latino individuals and a lower unemployment rate for Asian and Latino individuals than for white individuals. *Id.* Again, this evidence does not demonstrate consistency of socioeconomic standards for Black, Latino, and Asian voters, which would be required to find that Senate Factor 5 favors *Pendergrass* Plaintiffs in their attempt to establish a coalition in this area.

Thus, *Pendergrass* Plaintiffs have only presented inconsistent socioeconomic data and presented no evidence of Asian and Latino voter participation. *Compare* [Pendergrass Doc. 317, p. 22] *with* Order, pp. 242–50]. Without more, this Court cannot conclude that there is any impact on the political participation of Black, Latino, and Asian voters in the area of enacted Congressional District 7.

5. *Senate Factor 6: No evidence of racial appeals in campaigns.*

Pendergrass Plaintiffs also present no evidence at all on any racial appeals affecting Latino and Asian voters. Thus, this Court cannot conclude that the political campaigns in the area of enacted Congressional District 7 are

“characterized by subtle or overt racial appeals.” *Wright*, 979 F.3d at 1296. As it did in its Order, this Court should assign no weight to this factor. Order, p. 252.

6. *Senate Factor 7: Extent of election of Latino and Asian officials is not relevant when they are not the relevant minority group.*

It is unclear how *Pendergrass* Plaintiffs ask this Court to apply Senate Factor 7, because they seek to rely on the lack of Latino or Asian elected officials. But Plaintiffs admit Georgia currently has a statewide elected Latino official and a statewide Asian-American official. [*Pendergrass* Doc. 317, p. 23]. Also, Plaintiffs do not address the statewide Latino and Asian populations, which are significantly smaller than the Black population in Georgia.

7. *Senate Factor 8: This Court cannot presume unresponsiveness, as it already found.*

Pendergrass Plaintiffs revisit the same approach this Court already rejected regarding unresponsiveness, simply assuming that unresponsiveness exists because they do not like the remedial Congressional plan. *Pendergrass* Plaintiffs present no evidence of a “determination to impose a ceiling on minority opportunity in the State” nor any evidence of unresponsiveness. Just as during the trial, they simply ask this Court to assume unresponsiveness. This Court already found this kind of approach to Senate Factor 8 is not appropriate, and it should not be utilized here either. Order, pp. 259–60.

8. *Senate Factor 9: This Court already determined the State’s policies were partisan and they remained so.*

Perhaps most surprising given the requirement of presuming the good faith of the legislature, *Pendergrass* Plaintiffs attack the motivations of the General Assembly in adopting the remedial plans. This Court earlier found that the motivations for the 2021 redistricting plans were non-tenuous because they were partisan, Order, pp. 260–62, and the statements of legislators in the 2023 special session match that approach—they repeatedly emphasized that they were seeking to achieve partisan ends while also complying with the Court’s Order and taking into account a variety of traditional redistricting principles and communities of interest. See, e.g., Ex. C at 10:22–11:12; Ex. D at 24:21–25,

Pendergrass Plaintiffs also attempt to import the entirety of their “beauty contest” approach into this Senate factor, claiming that the mere fact that the General Assembly lowered the compactness scores for districts it had previously created showed some improper intent. *Pendergrass* Plaintiffs again claim that coalition district precedent is “binding,” [Pendergrass Doc. 317, pp. 24-25], when that is simply not true.

Finally, *Pendergrass* Plaintiffs walk right up to the line of alleging intentional racial discrimination by the General Assembly during the 2023 special session. Not only does this ignore the required presumption of good

faith to legislative actions, it is inappropriate to conclude based on a single legislator's statement. *Greater Birmingham Ministries v. Sec'y of Ala.*, 992 F.3d 1299, 1324 (11th Cir. 2021). Further, this claim ignores the careful, deliberative process the General Assembly undertook and explained in committee meetings about the plan. *See* Facts Regarding Remedial Plans, Sections II–V, above. *Pendergrass* Plaintiffs have not offered any evidence that supports a finding of intentional racial discrimination, nor is that appropriate to consider under this Senate factor.

Just like the evidence at trial, partisanship by a political branch is not a tenuous justification and does not support a finding of a Section 2 violation here.

D. *Pendergrass* Plaintiffs have not shown a Section 2 violation from changing the character of District 7.

Pendergrass Plaintiffs are wrong on the law and have not put forward sufficient evidence to support their claims about enacted Congressional District 7. Although it originally drew Congressional District 7 as a coalition district in 2021 as an exercise of state policy, the General Assembly is not *required* to draw a coalition district where Congressional District 7 was previously located. Even if it was, *Pendergrass* Plaintiffs have not put forward sufficient evidence of a coalition that could support a Section 2 claim in that area based on the *Gingles* preconditions, especially considering the significant

differences in Asian, Latino, and Black voters in the district. Further, *Pendergrass* Plaintiffs have not shown that the totality of the circumstances shows a lack of equal openness for Asian, Latino, and Black voters in the area covered by the former Congressional District 7. As a result, *Pendergrass* Plaintiffs have not shown that the Congressional remedial plan has any Section 2 violation in it, and there is no reason to stop the State from using that plan in the 2024 elections.

IV. This Court should not adopt Plaintiffs' plans (APA/Grant/Pendergrass).

Even if this Court determines that the General Assembly plans should not be used, it should not adopt Plaintiffs' plans outright. This Court is required to defer to the legislative policy determinations as far as is possible except in situations where there are separate violations of Section 2 or the Constitution. *Tallahassee Branch of NAACP*, 827 F.2d at 1438. The Court now has the benefit of the General Assembly's remedial plans and must defer to the policy decisions made in those plans as far as is possible. Because none of Plaintiffs' plans were drawn with those policy goals in mind, they are not appropriate remedies for this Court to order.

V. Time is of the essence to ensure election officials can administer the 2024 elections (APA/Grant/Pendergrass).

As this Court is aware, the administration of elections is a complicated endeavor, and works backward from the date of the election. *Alpha Phi Alpha*

Fraternity v. Raffensperger, 587 F. Supp. 3d 1222, 1321 (N.D. Ga. 2022). Under the 2024 election calendar, which is attached as Ex. J, the addition of the Presidential Preference Primary in March 2024 complicates the election schedule this year. Nomination petitions can be circulated as early as January 11, 2024, and qualifying for the May Primary and November General elections begins on March 4, 2024 at 9:00am. Ex. J, pp. 1, 3. Time is of the essence to ensure the parameters of the election are set before the eve of the election. *Purcell v. Gonzales*, 549 U.S. 1, 4–5 (2006) (per curiam); *Republican Nat’l Comm. v. Democratic Nat’l Comm.*, 140 S. Ct. 1205, 1207 (2020).

CONCLUSION

The Georgia General Assembly took this Court and its obligations to Georgia voters seriously and fulfilled the mission this Court gave it—to create additional majority-Black districts in defined areas, while also complying with other traditional redistricting principles.

Plaintiffs admit the General Assembly drew the districts this Court required. And their objections are based on partisanship rather than in fact or law. But Plaintiffs’ mere dislike of the political outcome of their case is not a legal ground for the Court to reject the remedial plans. Georgia’s remedial maps fully comply with this Court’s Order and the Voting Rights Act. This Court should overrule Plaintiffs’ objections and allow Georgia to use its chosen district maps in the 2024 election cycle.

Respectfully submitted this 18th day of December, 2023.

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Brad Raffensperger*

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CERTIFICATE OF COMPLIANCE

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

/s/ *Bryan P. Tyson*
Bryan P. Tyson

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EXHIBIT A

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

ALPHA PHI ALPHA FRATERNITY
INC., *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:21-CV-05337-SCJ

COAKLEY PENDERGRASS, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:21-CV-05339-SCJ

ANNIE LOIS GRANT, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER,

Defendant.

CIVIL ACTION

FILE NO. 1:22-CV-00122-SCJ

**DECLARATION OF GINA WRIGHT
(REMEDIAL MAPS)**

Pursuant to 28 U.S.C. § 1746, I, GINA WRIGHT, make the following declaration:

1. My name is Gina Wright. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2. I am the Executive Director of the Legislative and Congressional Reapportionment Office (LCRO), a joint office of the Georgia General Assembly. The LCRO is responsible for providing redistricting services to legislators using data obtained from the United States Census Bureau. The LCRO assists the General Assembly in drawing the districts of the State Senate and State House of Representatives, the Public Service Commission, as well as the fourteen (14) United States Congressional districts. Through sponsorship from a legislator, the LCRO also assists local County Commissions, Boards of Education, and City Councils in adjusting their districts. Finally, the LCRO also provides an array of maps and data reports to both legislators and the public at large.

3. As Executive Director, I oversee and direct a staff of four (4) in providing redistricting and other mapping services to the Georgia General Assembly. These services may include drawing maps for statewide legislative districts, local redistricting plans, city creation boundaries, annexations and de-annexations, as well as precinct boundary changes. All local redistricting

bills through the House Committee on Intragovernmental Coordination require my signature following a technical review of the bill. I am the official state liaison for Georgia for the 2020 Census Redistricting Data Program. I oversee the creation of our statewide voting precinct mapping layer through my work with all county election officials throughout the state. I assist the Office of the Attorney General in candidate qualification challenges related to issues regarding a candidate's residency.

4. I regularly assist federal courts as an expert or technical advisor in redistricting matters. I participate in the Redistricting and Elections Standing Committee of the National Conference of State Legislatures and contribute to their databases and publications. Finally, I participate as a presenter in statewide forums such as The Georgia Association of Voter Registrars and Elections Officials Association ("GAVREO"), the Georgia Municipal Association (the "GMA"), the Association of County Commissioners in Georgia (the "ACCG") and the Georgia Legislative CLE class.

5. I began work with the LCRO in December of 2000 as a Redistricting Services Specialist. I became Executive Director of the LCRO in June 2012. I am a 2000 summa cum laude graduate from Georgia State University. I have a Bachelor of Arts degree in Political Science and a minor in Spanish.

6. I have been appointed as an expert or technical advisor for redistricting by federal courts in the following cases:

- *Ga. State Conf of the NAACP v. Fayette County Bd. of Comm'rs*, 996 F. Supp. 2d 1353, 1359 (N.D. Ga. 2014) (appointed as the Court's "independent technical advisor"); *see also Ga. State Conf of the NAACP v. Fayette County Bd of Comm'rs*, 118 F. Supp. 3d 1338, 1340 (N.D. Ga. 2015) ("Court-appointed expert or technical advisor").
- *Crumly v. Cobb County Bd. of Elections & Voter Registration*, 892 F. Supp. 2d 1333, 1344 (N.D. Ga 2012) (appointed as the "Court's technical advisor and consultant").
- *Martin v. Augusta-Richmond County*, 2012 U.S. Dist. LEXIS 85113, *2-3 (S.D. Ga 2012) (appointed by Court as "advisor and consultant").
- *Walker v. Cunningham*, 2012 U.S. Dist. LEXIS 178337, *5 (S.D. Ga. 2012) (appointed by Court "as its independent technical advisor") (3 judge panel).
- *Bird v. Sumter County Board of Educ.*, CA No. 1:12cv76-WLS (M.D. Ga. 2013) ECF 70 p. 5 (appointing Gina Wright as the Court's "independent technical advisor").
- *Adamson v. Clayton County Elections and Reg. Bd.*, CA No. 1:12cv1665-CAP (N.D. Ga. 2012), ECF 23 p. 2 (appointing Gina Wright as the Court's "independent technical advisor").

7. In the past several years I have testified, either at trial or by deposition, in:

- *NAACP v. Kemp*, CA No. 1:17-cv-1427 (N.D. Ga.) (3 judge court) (consolidated with *Thompson v. Kemp*).
- *Ga. State Conf. of the NAACP v. Fayette County Bd. Of Comm'rs*.
- The trial of all three of these cases as an expert witness in the preliminary injunction proceeding and as a fact witness in the trial of these cases.

8. I am not being compensated separately for my work in this matter.

9. I was the map drawer for all three remedial plans prior to and during the 2023 special legislative session. No member of my staff drew any of the districts—I was the sole map drawer.

10. I worked directly with Sen. Shelly Echols, Sen. Bo Hatchett, and Rep. Rob Leverett on the creation of the 2023 remedial Congressional, state Senate, and state House plans.

11. I was provided by counsel with block equivalency files for the Plaintiff plans referenced in this court's order and imported those into our office system so I could review them in preparation for drawing the remedial plans.

12. My office prepares legal descriptions, map packets, and other mapping files for each plan where any legislator requests that the plan be

introduced as legislation. Each map packet includes copies of the map, various zoomed-in views, and statistics regarding that plan. These plans and associated information are posted to the webpage for my office at the request of the legislator.

13. Attached as Ex. 1 is the map packet for the 2023 remedial Congressional plan, SB 3EX. This map was first publicly released on the webpage of my office on December 1, 2023.

14. Attached as Ex. 2 is the map packet for the 2023 remedial Senate plan, SB 1EX. This map was first publicly released on the webpage of my office on November 27, 2023.

15. Attached as Ex. 3 is the map packet for the 2023 remedial House plan, HB 1EX. This map was first publicly released on the webpage of my office on November 28, 2023. Attached as Ex. 4 is another statistical sheet showing the AP Black percentages for the plan.¹

¹ Our office does not traditionally produce statistical packets using the “Any-Part” numbers because the totals will add up to more than 100% which can cause confusion. But we prepared those reports during the special session because we understand courts use “Any-Part Black” numbers in reviewing redistricting plans.

CONGRESSIONAL PLAN

16. The Congressional remedial plan adds a new majority-Black district, District 6, which was previously a majority-white district.

17. District 6 is located in western metro Atlanta and is located in portions of Cobb, Douglas, and Fulton Counties. District 6 includes the entirety of the cities of Powder Springs, Austell, Smyrna, South Fulton, Fairburn, and Union City.

18. With the reconfiguration of the Congressional districts, the Congressional remedial plan has five districts with a majority AP Black percentage on total population (2, 4, 5, 6, and 13) and four districts with a majority AP Black percentage using voting-age population (4, 5, 6, and 13).

19. The Congressional remedial plan increases the county splits from the 2021 enacted Congressional plan by one but reduces the number of counties that were split into four districts from two counties to one county.

STATE SENATE PLAN

20. The Senate remedial plan contains two new majority-Black districts, which are District 17 (located in south Metro Atlanta) and District 28 (located in portions of south and west Metro Atlanta).

21. The new majority-Black district numbers correspond to the districts on the Plaintiffs' illustrative plans for ease of reference.

22. Other district numbers were changed when districts collapsed from one area and moved to another area so those changes were clear.

23. The Senate remedial plan increases the county splits from the 2021 enacted Senate plan by one because Carroll County is newly split. It reduces the number of splits in Douglas County from three to two and in DeKalb County from seven to six.

STATE HOUSE PLAN

24. The House remedial plan contains five new majority-Black districts, which are District 64 (located in western Metro Atlanta), District 74 (located in south Metro Atlanta), District 117 (located in south Metro Atlanta), District 145 (located in the Macon area), and District 149 (located in the Macon area).

25. Two of the new majority-Black districts (District 64 and District 117) are located completely within a county.

26. District 64 is wholly within Douglas County and encompasses the Chapel Hill community with a large portion of the attendance areas for Chapel Hill High School and New Manchester High School.

27. District 117 is wholly within Henry County and includes communities in central and south Henry including the majority of the area surrounding Luella High School and McDonough High School.

28. The new majority-Black district numbers correspond to the districts on the Plaintiffs' illustrative plans for ease of reference.

29. Other district numbers were changed when districts collapsed from one area and moved to another area so those changes were clear.

30. The House remedial plan reduces the county splits from the 2021 enacted House plan by one, for a total of 68 split counties. It reduces the total number of district splits in Douglas, Gwinnett, Rockdale, and Spalding Counties by one each.

IMPLEMENTATION ISSUES

31. My office prepares information for county election officials when district boundaries change. This notifies county election officials that there has been a change to the districts and what the new district numbers for each type of map should be in their county.

32. Maps and electronic files are provided to assist them as they update information in the voter-registration database assigning voters to the districts they will vote in.

33. Across all three plans, the total number of counties that are required to make changes to district boundaries as a result of the remedial plans is 20 out of 159 or only about 12.6% of the counties in Georgia.

34. An additional 21 counties will have to change a district number only, but not modify any of their district combinations or adjust voter assignments.

35. Minimizing the number of counties that have to make changes is a benefit to election officials because it means most counties will not have to make updates to implement the 2023 remedial plans.

36. Further, my office regularly receives updated precinct information from counties. An updated precinct layer is created every two years and is posted on our webpage. Current precincts will differ from Census VTDs.

37. The Census VTD layer corresponds to the 2018 voting precinct layer used in Georgia. This was the most recent version available when the VTD layer submission program deadline occurred.

38. During the process of drawing the remedial plans, I utilized the most current precinct boundaries available instead of Census VTDs. Using whole precincts helps election officials by reducing the number of ballot combinations in each county.

39. These whole new precincts will appear as split VTDs on a report from Maptitude or other GIS software because the standard reports in the software packages generally only utilize Census VTDs.

40. As an example, the Senate remedial plan in Newton County relies entirely on the new precincts in that county that were just approved in mid-

2023. A VTD report shows this as three (3) split VTDs where it is actually four (4) whole precincts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of December, 2023.

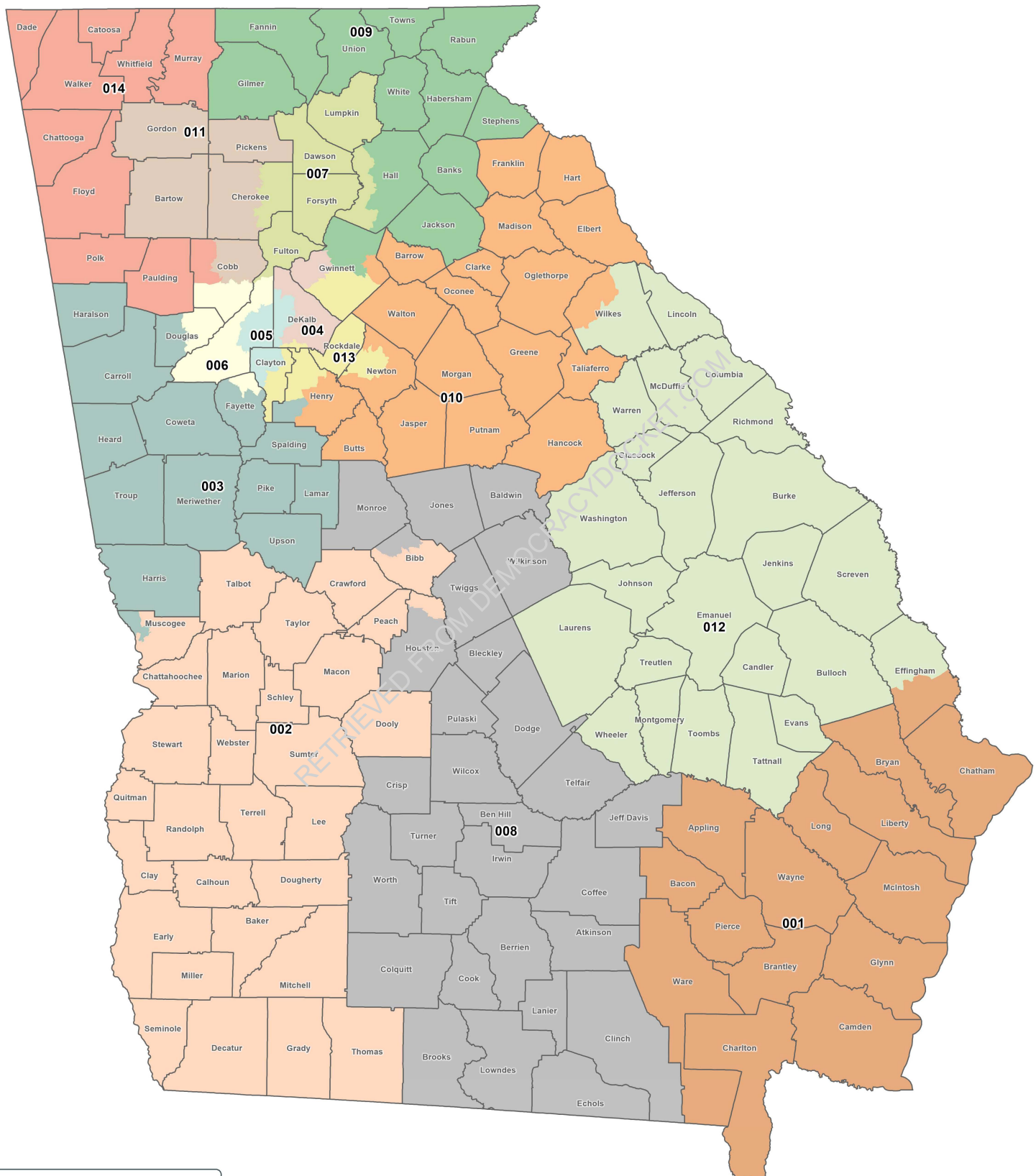

GINA WRIGHT

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EXHIBIT 1

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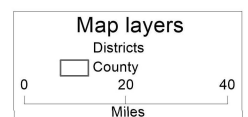
Proposed Congressional Districts of Georgia



Legislative and Congressional
Reapportionment Office

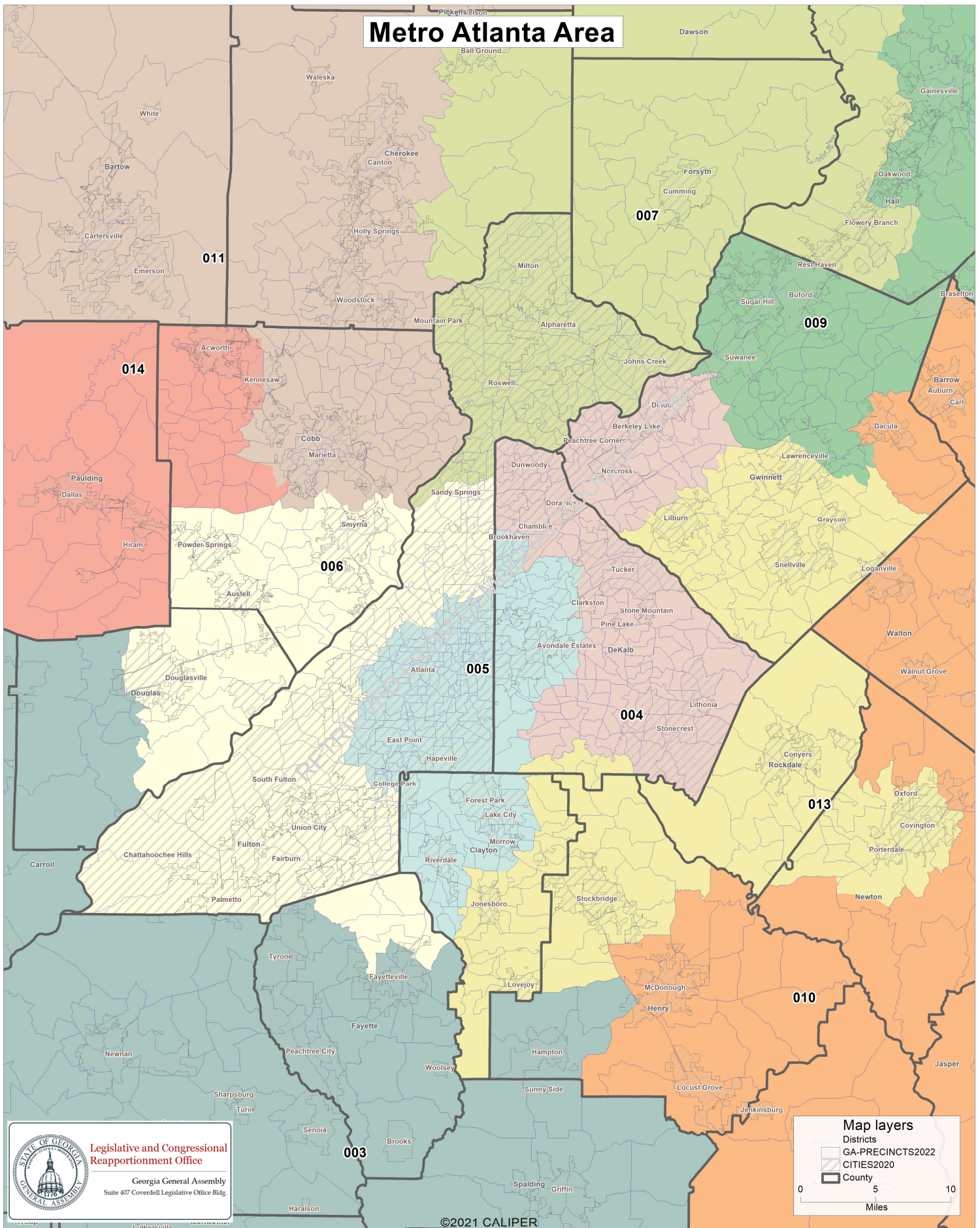
Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

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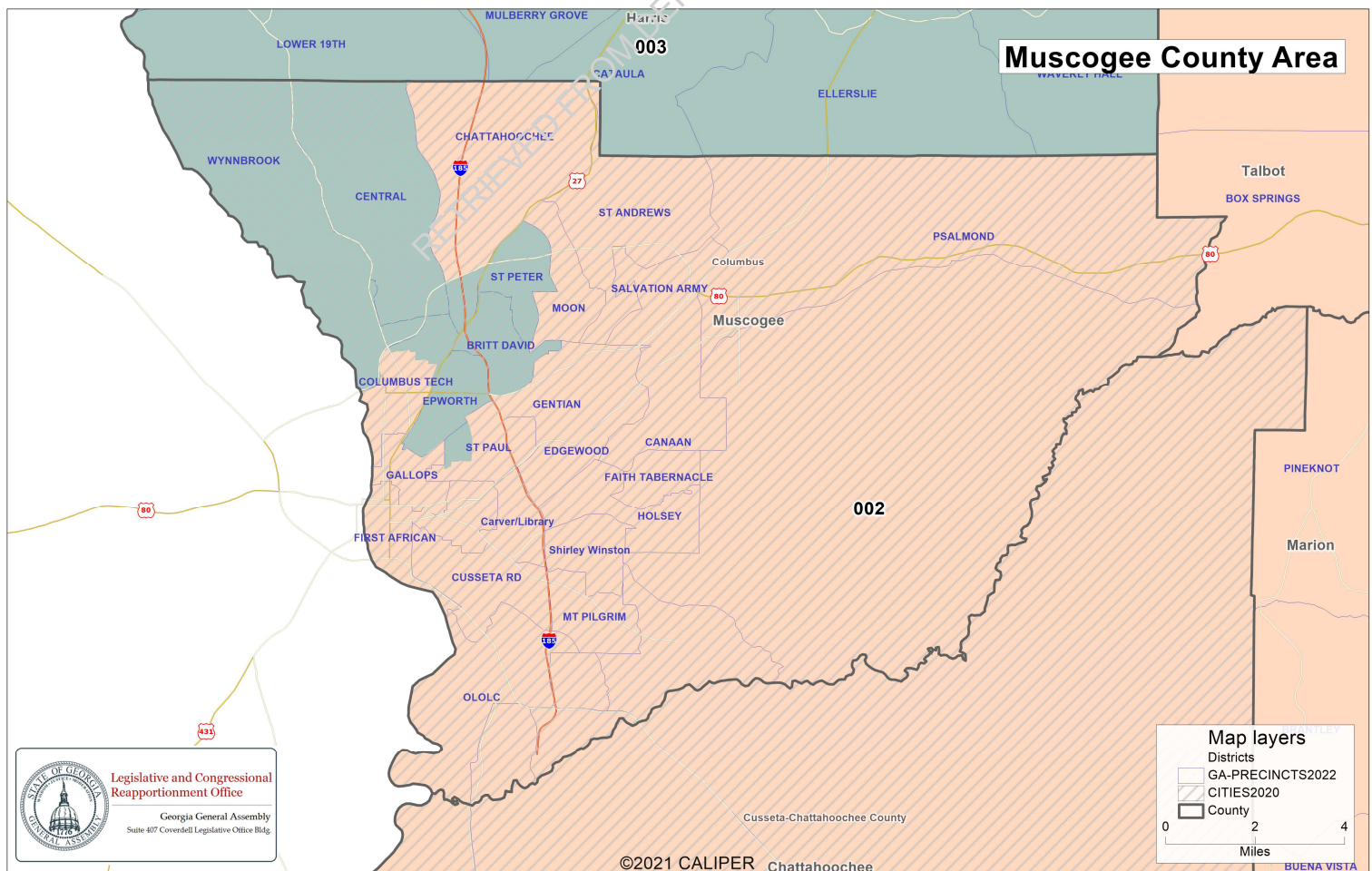
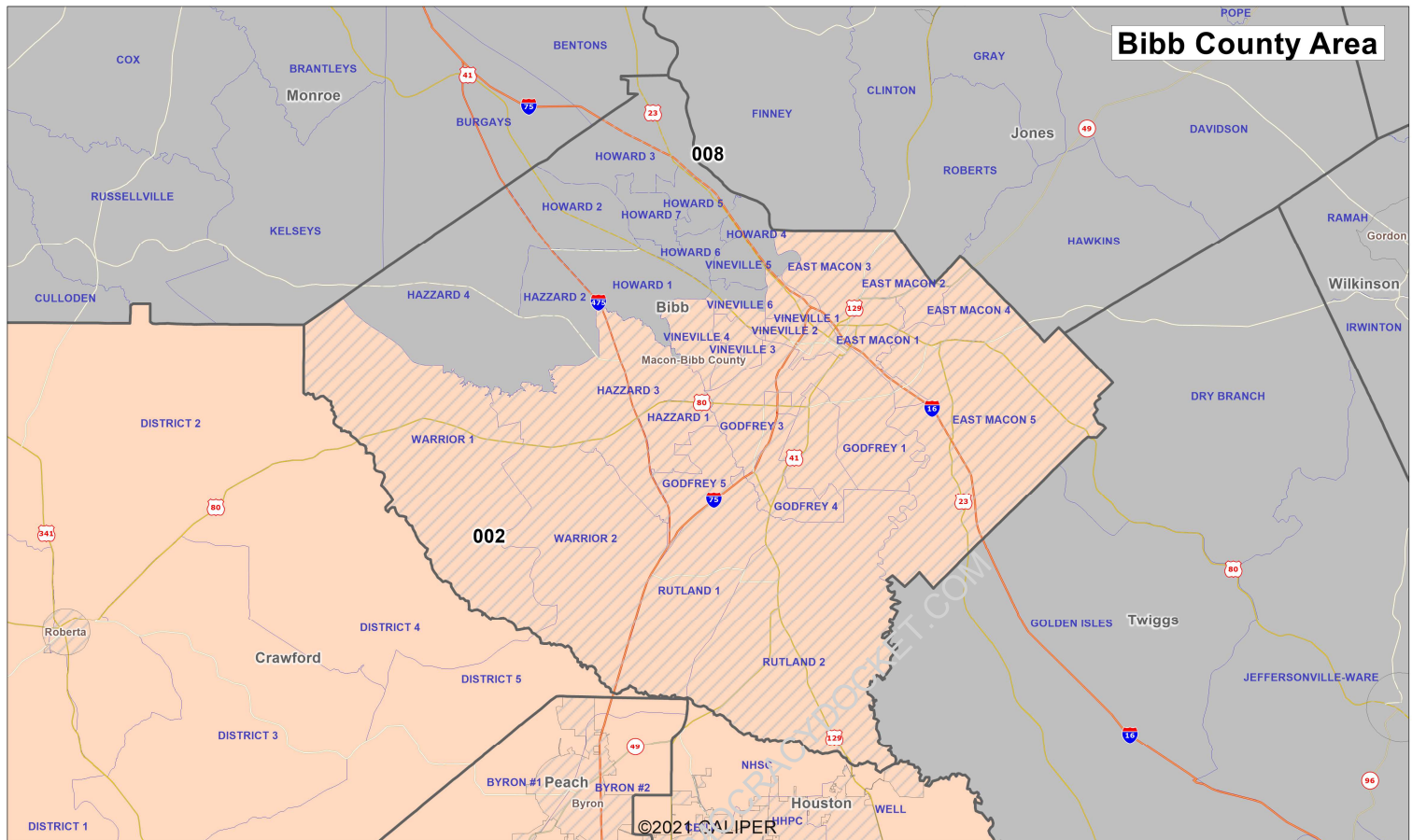


Proposed Congressional Districts of Georgia

Client: S049
Plan: Congress-2023
Type: Congress



Proposed Congressional Districts of Georgia



Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

Map layers

Districts

GA-PRECINCTS2022

CITIES2020

County

0 2 4
Miles

User: S049

Plan Name: Congress-2023

Plan Type: Congress

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	57.59%	27.54%	7.75%	2.19%	0.24%	0.16%	0.44%	5.32%
002	765,137	1	0.00%	587,555	76.79%	39.94%	49.03%	5.95%	1.34%	0.21%	0.1%	0.34%	4.02%
003	765,136	0	0.00%	586,319	76.63%	64.37%	22.61%	6.31%	2.09%	0.21%	0.04%	0.47%	5.1%
004	765,137	1	0.00%	582,946	76.19%	19.71%	47.54%	19.25%	9.6%	0.16%	0.03%	0.64%	4.03%
005	765,137	1	0.00%	613,735	80.21%	31.02%	49.79%	9.89%	5.07%	0.17%	0.03%	0.55%	4.34%
006	765,136	0	0.00%	593,690	77.59%	29.78%	50.18%	12.34%	3.4%	0.17%	0.04%	0.68%	4.4%
007	765,137	1	0.00%	579,339	75.72%	63.72%	7.75%	10.24%	13.54%	0.17%	0.04%	0.58%	5.25%
008	765,136	0	0.00%	585,857	76.57%	57.91%	29.72%	7.17%	1.56%	0.19%	0.05%	0.31%	4.03%
009	765,135	-1	0.00%	582,752	76.16%	60.91%	11.91%	16.14%	6.75%	0.18%	0.04%	0.45%	4.76%
010	765,137	1	0.00%	590,322	77.15%	62.48%	23.32%	7.61%	2.25%	0.17%	0.03%	0.54%	4.67%
011	765,135	-1	0.00%	589,100	76.99%	66.68%	11.44%	12.15%	4.14%	0.19%	0.04%	0.8%	5.93%
012	765,136	0	0.00%	588,119	76.86%	52.13%	36.12%	5.63%	1.83%	0.21%	0.11%	0.36%	4.7%
013	765,136	0	0.00%	572,137	74.78%	24.58%	49.62%	14.48%	6.91%	0.18%	0.05%	0.7%	4.63%
014	765,136	0	0.00%	579,137	75.69%	69.99%	11.86%	11.94%	1.51%	0.21%	0.04%	0.44%	5.28%

Total: 10,711,908**Ideal District: 765,136**

Summary Statistics:

Population Range: 765,135 to 765,137
Ratio Range: 0.00
Absolute Range: -1 to 1
Absolute Overall Range: 2
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.57
Relative Mean Deviation: 0.00%
Standard Deviation: 0.70

User: S049

Plan Name: Congress-2023

Plan Type: Congress

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	60.41%	26.44%	6.78%	2.36%	0.26%	0.14%	0.37%	3.24%
002	765,137	1	0.00%	587,555	76.79%	42.73%	47.62%	5.12%	1.41%	0.23%	0.09%	0.28%	2.53%
003	765,136	0	0.00%	586,319	76.63%	66.83%	22%	5.33%	2.08%	0.22%	0.04%	0.38%	3.11%
004	765,137	1	0.00%	582,946	76.19%	21.75%	47.86%	17%	9.92%	0.15%	0.03%	0.57%	2.71%
005	765,137	1	0.00%	613,735	80.21%	33.65%	48.53%	8.59%	5.48%	0.17%	0.04%	0.5%	3.05%
006	765,136	0	0.00%	593,690	77.59%	32.8%	49.04%	10.64%	3.69%	0.18%	0.04%	0.62%	2.97%
007	765,137	1	0.00%	579,339	75.72%	66.77%	7.73%	9.05%	12.44%	0.15%	0.04%	0.52%	3.29%
008	765,136	0	0.00%	585,857	76.57%	60.52%	28.84%	6.1%	1.6%	0.2%	0.05%	0.25%	2.43%
009	765,135	-1	0.00%	582,752	76.16%	64.51%	11.43%	13.72%	6.82%	0.2%	0.04%	0.36%	2.93%
010	765,137	1	0.00%	590,322	77.15%	65.28%	22.38%	6.45%	2.28%	0.18%	0.03%	0.47%	2.93%
011	765,135	-1	0.00%	589,100	76.99%	69.37%	11.4%	10.44%	4.07%	0.2%	0.04%	0.72%	3.76%
012	765,136	0	0.00%	588,119	76.86%	54.65%	35.06%	4.87%	1.95%	0.22%	0.1%	0.3%	2.86%
013	765,136	0	0.00%	572,137	74.78%	27.83%	48.6%	12.66%	7.14%	0.19%	0.05%	0.63%	2.91%
014	765,136	0	0.00%	579,137	75.69%	73.12%	11.47%	10%	1.54%	0.22%	0.04%	0.36%	3.25%

Total: 10,711,908**Ideal District: 765,136**

Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.57
Relative Mean Deviation:	0.00%
Standard Deviation:	0.70

User: S049

Plan Name: Congress-2023

Plan Type: Congress

Population Summary

*Census designation "AP" denotes respondents who are Any or Part of a race category; respondents may fall into more than one category.

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% 18+_AP_Wht]	[% 18+_AP_Blkl]	[% H18+_Pop]	[% 18+_AP_Ind]	[% 18+_AP_Asn]	[% 18+_AP_Hwn]	[% 18+_AP_Oth]	[% 18+_2+_Races]
001	765,137	1	0.00%	589,266	77.01%	66.62%	28.17%	6.78%	2%	2.99%	0.29%	5.46%	5.16%
002	765,137	1	0.00%	587,555	76.79%	46.83%	49.29%	5.12%	1.54%	1.89%	0.22%	4.39%	3.85%
003	765,136	0	0.00%	586,319	76.63%	72.38%	23.32%	5.33%	2.09%	2.55%	0.12%	4.8%	4.97%
004	765,137	1	0.00%	582,946	76.19%	29.33%	50.59%	17%	1.9%	10.64%	0.15%	15.14%	7.24%
005	765,137	1	0.00%	613,735	80.21%	39.57%	51.06%	8.59%	1.53%	6.33%	0.13%	7.42%	5.57%
006	765,136	0	0.00%	593,690	77.59%	39.56%	51.75%	10.64%	1.63%	4.31%	0.13%	9.52%	6.41%
007	765,137	1	0.00%	579,339	75.72%	75.03%	8.93%	9.05%	1.79%	13.23%	0.13%	8.51%	7.23%
008	765,136	0	0.00%	585,857	76.57%	65.6%	30.04%	6.1%	1.63%	2.03%	0.14%	4.83%	4%
009	765,135	-1	0.00%	582,752	76.16%	73.8%	12.65%	13.72%	2.31%	7.37%	0.12%	11.68%	7.58%
010	765,137	1	0.00%	590,322	77.15%	71.04%	23.69%	6.45%	1.93%	2.78%	0.12%	5.81%	5.08%
011	765,135	-1	0.00%	589,100	76.99%	78.35%	12.83%	10.44%	2.36%	4.75%	0.12%	9.55%	7.58%
012	765,136	0	0.00%	588,119	76.86%	59.51%	36.72%	4.87%	1.67%	2.55%	0.22%	4.01%	4.33%
013	765,136	0	0.00%	572,137	74.78%	34.82%	51.45%	12.66%	1.85%	7.74%	0.16%	11.35%	6.9%
014	765,136	0	0.00%	579,137	75.69%	80.9%	12.59%	10%	2.68%	1.95%	0.11%	8.43%	6.36%

Total: 10,711,908

Ideal District: 765,136

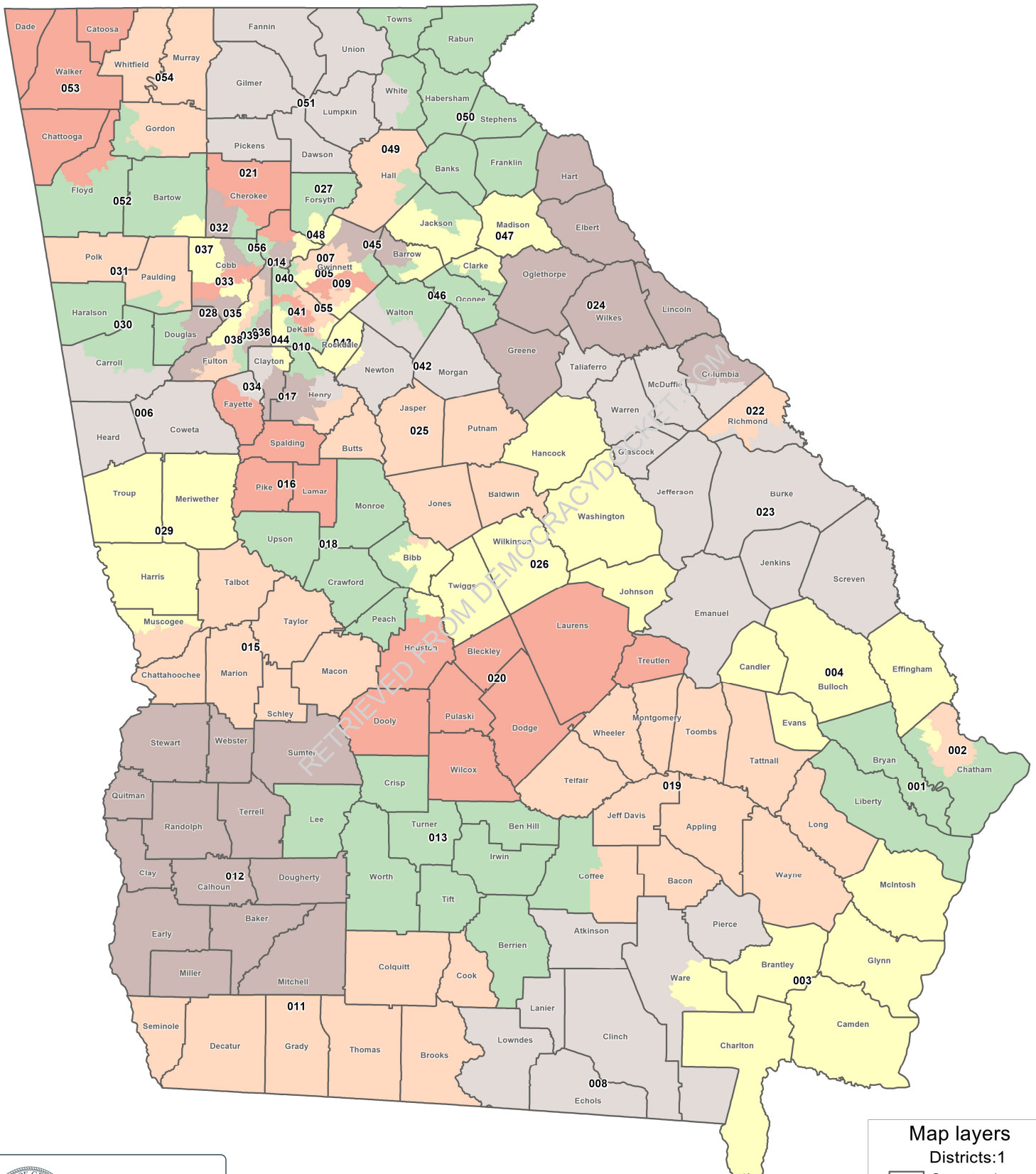
Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.57
Relative Mean Deviation:	0.00%
Standard Deviation:	0.70

EXHIBIT 2

RETRIEVED FROM DEMOCRACYDOCKET.COM

Proposed Georgia Senate Districts



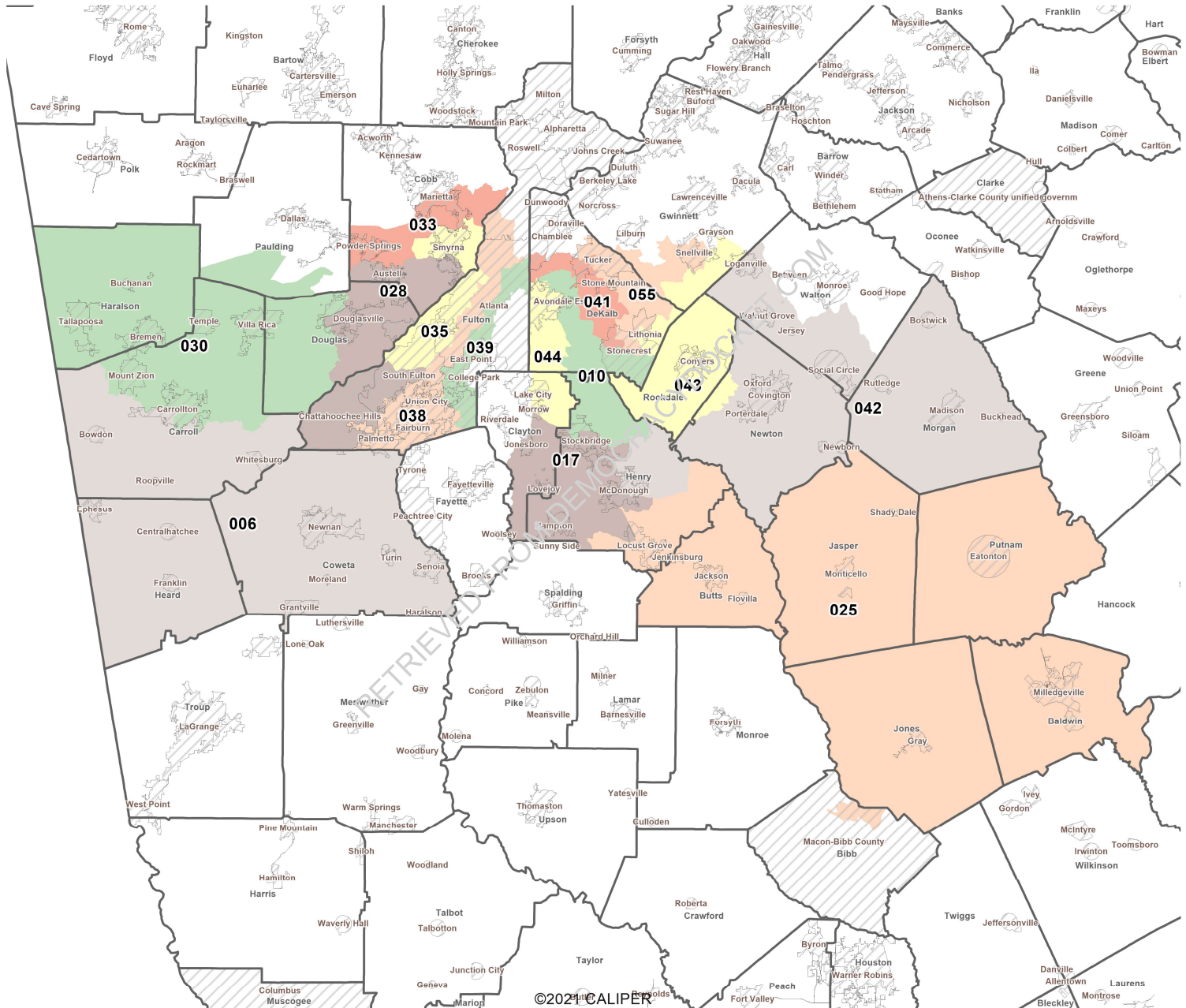
Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

Proposed Georgia Senate Districts

Client: S049
Plan: Senate-2023
Type: Senate

Modified Districts



Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

Map layers

Districts:1

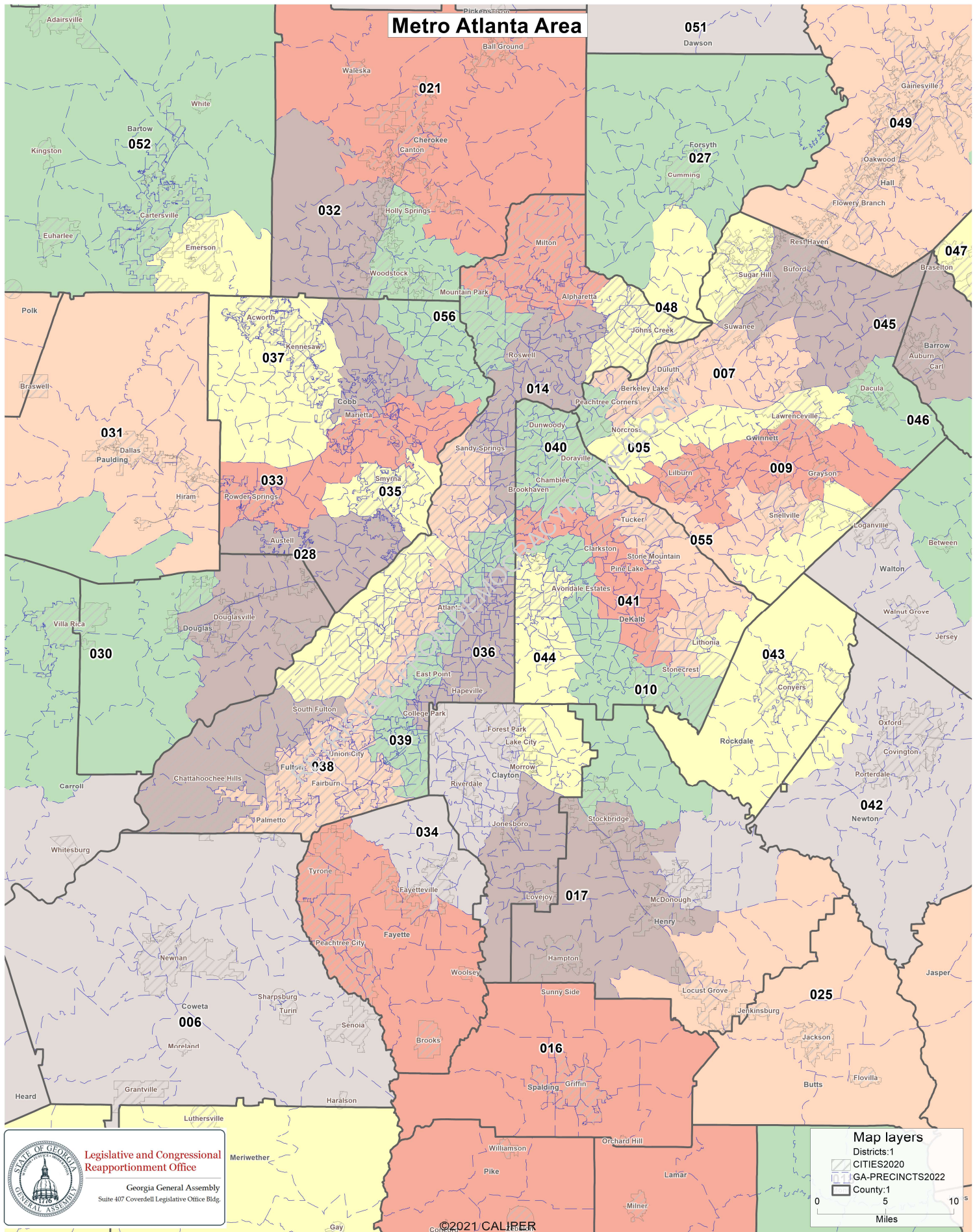
CITIES2020

County:1

0 7.5 15
Miles

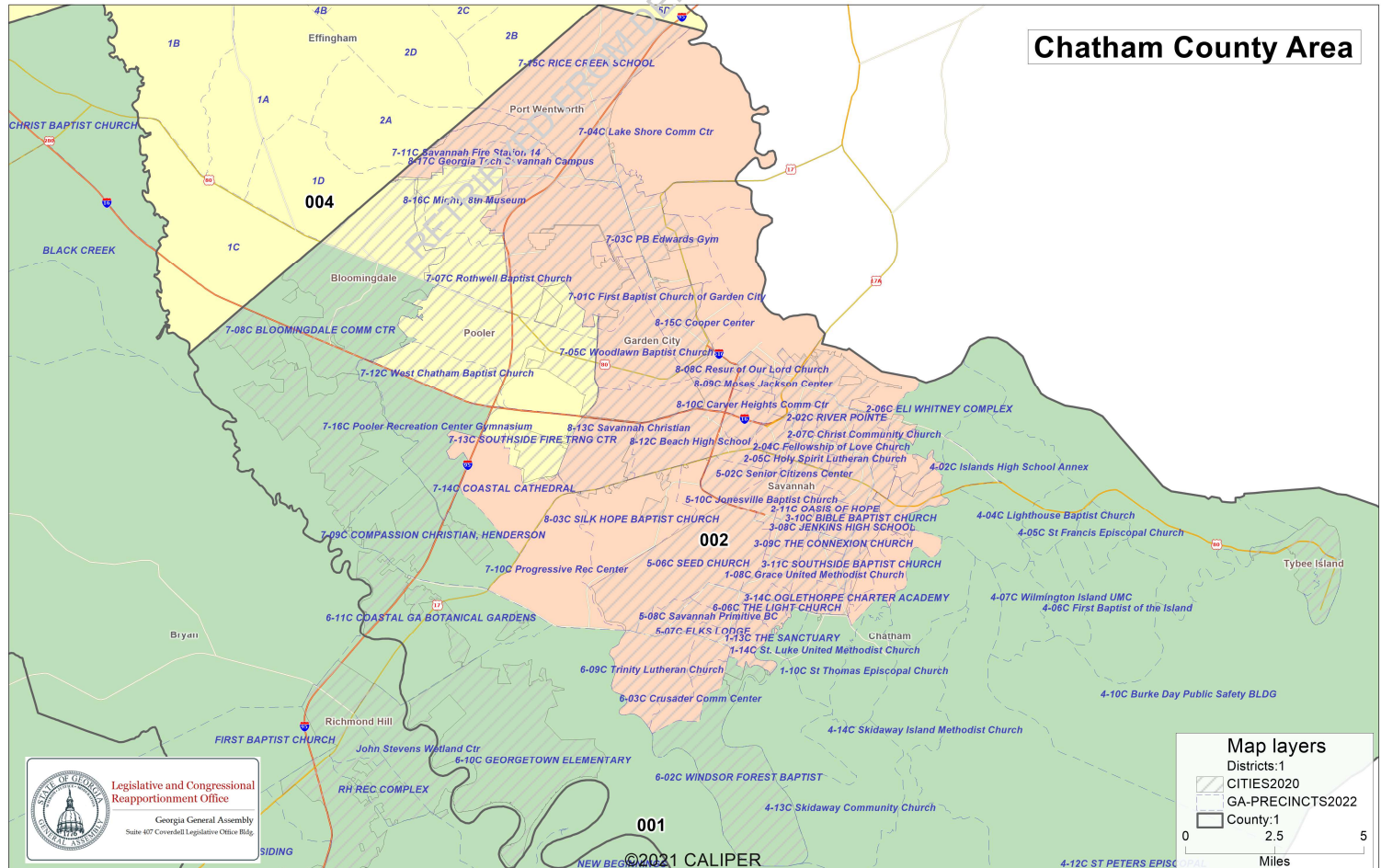
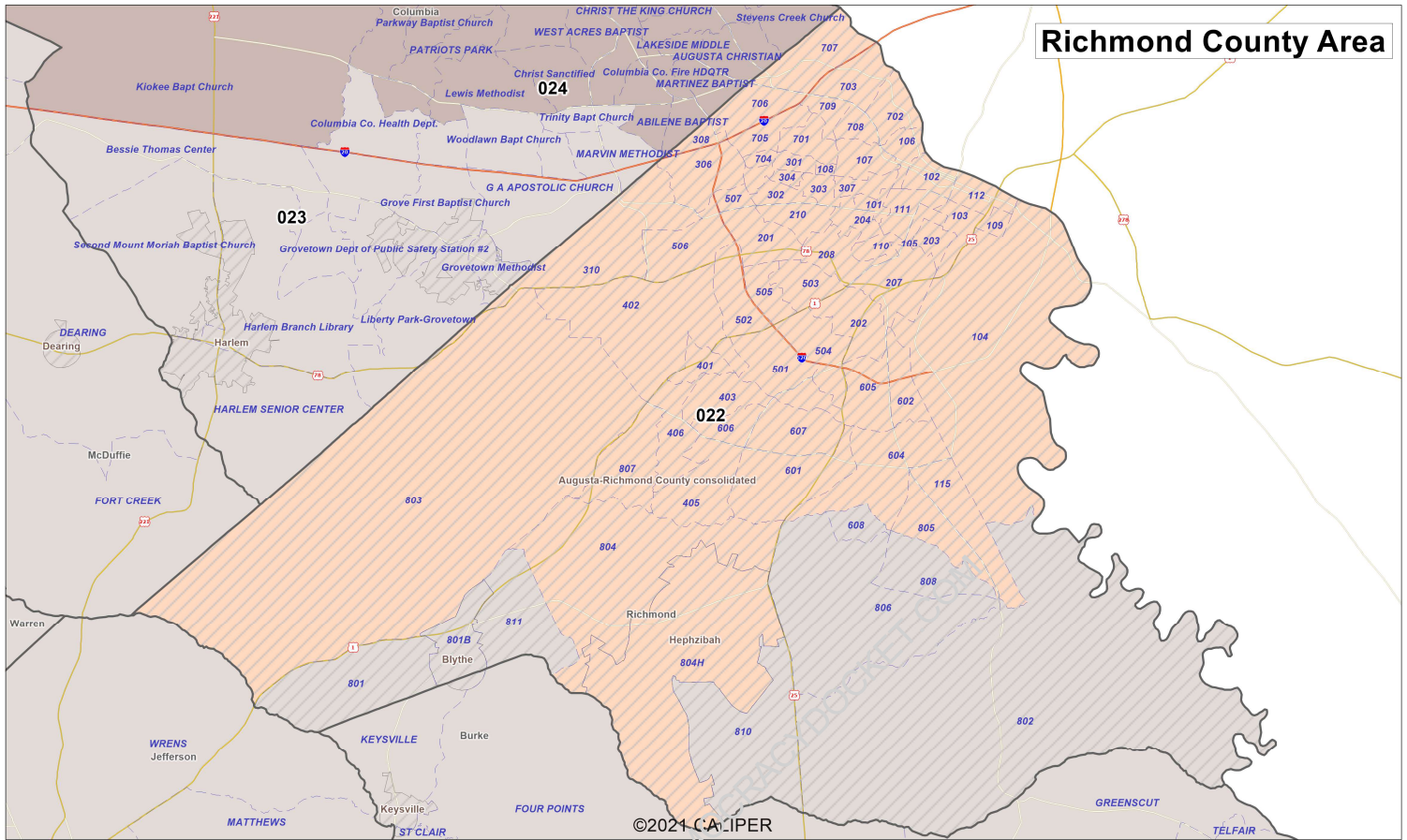
Proposed Georgia Senate Districts

Client: S049
Plan: Senate-2023
Type: Senate



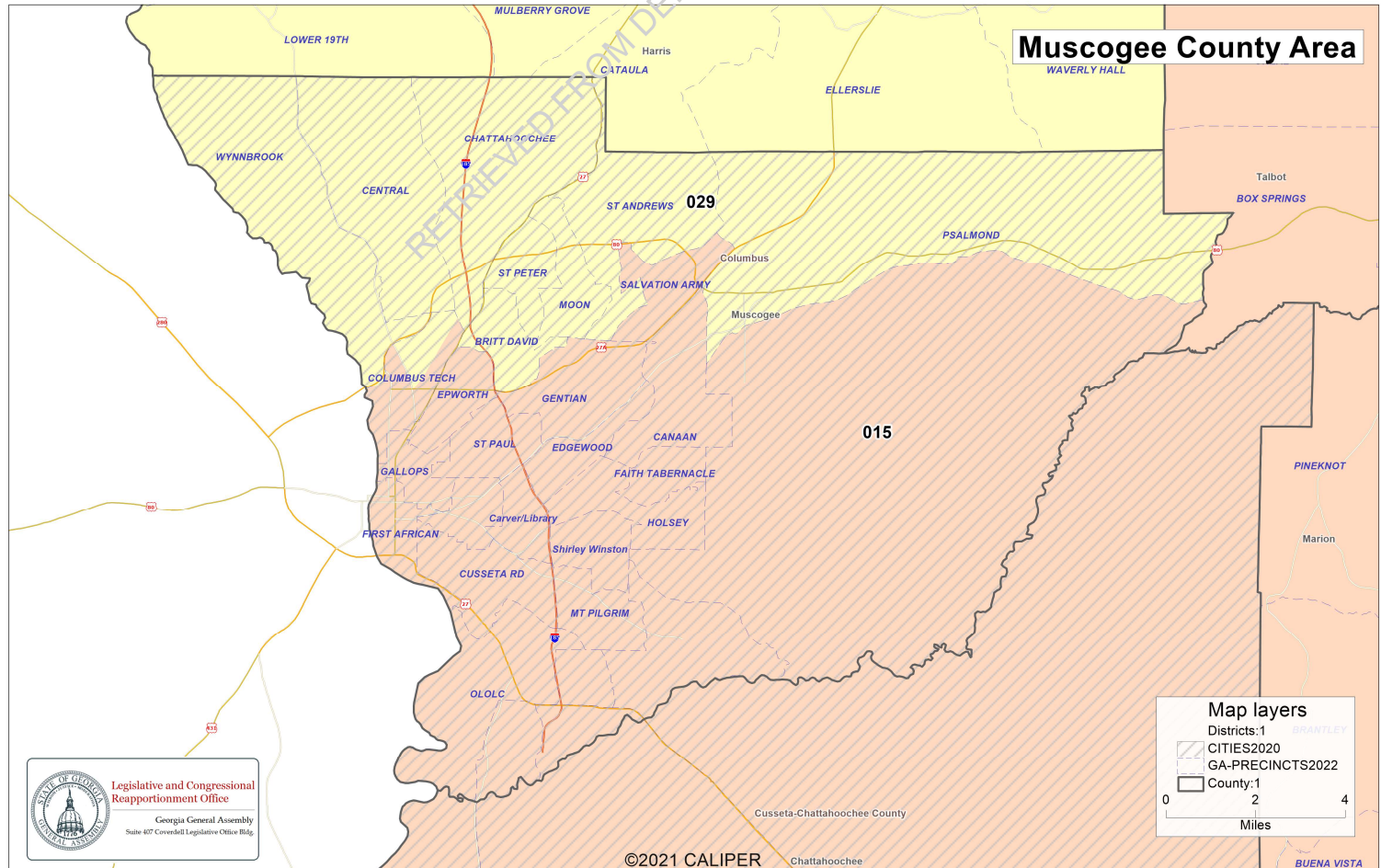
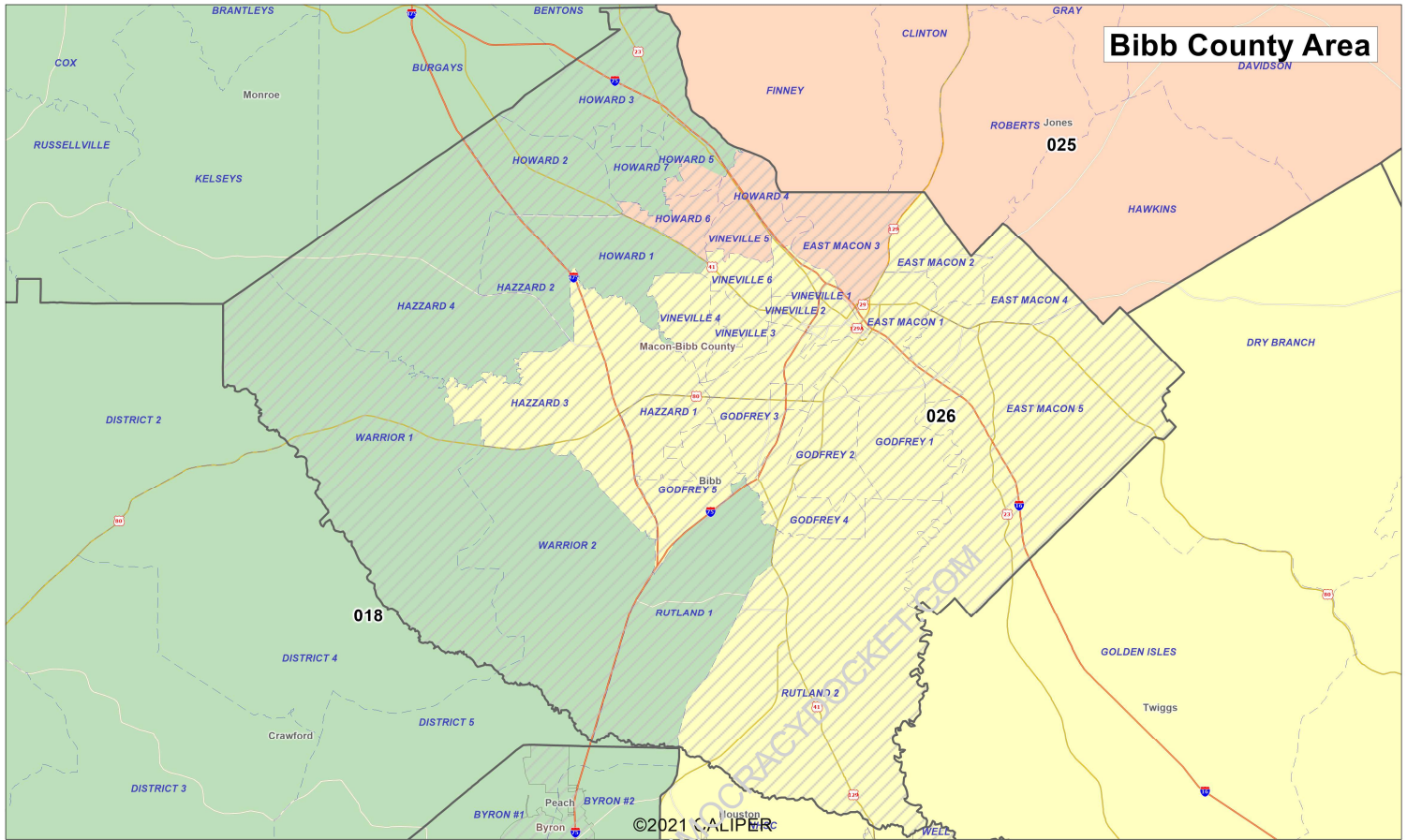
Proposed Georgia Senate Districts

Client: S049
Plan: Senate-2023
Type: Senate



Proposed Georgia Senate Districts

Client: S049
Plan: Senate-2023
Type: Senate



User: S049

Plan Name: Senate-2023

Plan Type: Senate

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	58.9%	23.66%	8.78%	2.64%	0.25%	0.3%	0.48%	6.56%
002	190,408	-876	-0.46%	150,843	79.22%	36.4%	47.51%	8.36%	3.4%	0.21%	0.15%	0.46%	4.41%
003	191,212	-72	-0.04%	148,915	77.88%	66.23%	20.92%	6.82%	1.22%	0.26%	0.09%	0.42%	5.19%
004	191,098	-186	-0.10%	146,443	76.63%	64.48%	22.6%	6.49%	1.86%	0.23%	0.07%	0.38%	5.08%
005	191,921	637	0.33%	139,394	72.63%	13.35%	26.84%	45.47%	10.98%	0.15%	0.04%	0.64%	3.47%
006	191,052	-232	-0.12%	146,190	76.52%	70.38%	16.31%	6.8%	1.88%	0.2%	0.04%	0.42%	5.18%
007	189,709	-1,575	-0.82%	147,425	77.71%	35.09%	20.08%	18.57%	21.67%	0.16%	0.04%	0.66%	4.79%
008	192,396	1,112	0.58%	145,144	75.44%	57.39%	30.03%	7.28%	1.21%	0.28%	0.07%	0.35%	4.5%
009	192,915	1,631	0.85%	142,054	73.64%	32.04%	28.46%	21.09%	13.98%	0.18%	0.03%	0.72%	4.73%
010	192,983	1,699	0.89%	152,681	79.12%	23.46%	63.28%	5.42%	3.58%	0.17%	0.03%	0.62%	4.37%
011	189,976	-1,308	-0.68%	144,597	76.11%	55.75%	31.13%	9.36%	0.69%	0.23%	0.03%	0.26%	3.33%
012	190,819	-465	-0.24%	149,154	78.17%	33.83%	58.82%	3.89%	0.86%	0.16%	0.02%	0.21%	2.82%
013	189,326	-1,958	-1.02%	144,141	76.13%	61.25%	27.08%	7.2%	1.2%	0.17%	0.02%	0.26%	3.69%
014	192,533	1,249	0.65%	155,340	80.68%	54.63%	16.79%	13.97%	9.46%	0.13%	0.04%	0.79%	5.2%
015	189,446	-1,838	-0.96%	144,506	76.28%	34.07%	52.31%	7.57%	1.31%	0.23%	0.27%	0.44%	4.97%
016	191,829	545	0.28%	147,133	76.7%	64.19%	22.31%	5.95%	3.04%	0.17%	0.03%	0.51%	4.94%
017	190,000	-1,284	-0.67%	142,855	75.19%	20.68%	61.8%	8.89%	4.19%	0.19%	0.05%	0.73%	4.61%
018	191,825	541	0.28%	150,196	78.3%	58.41%	30.01%	5.18%	2.42%	0.22%	0.03%	0.4%	4.25%
019	192,316	1,032	0.54%	146,131	75.98%	61.67%	24.76%	9.72%	0.58%	0.17%	0.06%	0.27%	3.64%
020	192,588	1,304	0.68%	147,033	76.35%	59.74%	30.65%	4.21%	1.73%	0.15%	0.05%	0.31%	4.14%
021	192,572	1,288	0.67%	145,120	75.36%	71.13%	6.52%	10.13%	7.38%	0.19%	0.04%	0.53%	5.41%
022	193,163	1,879	0.98%	150,450	77.89%	31.1%	56.58%	5.63%	1.97%	0.24%	0.18%	0.44%	4.96%
023	190,344	-940	-0.49%	144,113	75.71%	54.27%	34.66%	5.46%	1.16%	0.24%	0.1%	0.34%	4.99%
024	192,674	1,390	0.73%	148,602	77.13%	67.45%	18.98%	5.4%	3.31%	0.18%	0.09%	0.43%	5.38%
025	189,469	-1,815	-0.95%	147,337	77.76%	60.69%	30.55%	4.05%	0.93%	0.17%	0.04%	0.41%	4.06%
026	189,945	-1,339	-0.70%	145,744	76.73%	33.26%	57.37%	4.85%	0.83%	0.21%	0.04%	0.31%	4.09%
027	190,676	-608	-0.32%	139,196	73%	68%	4.31%	11.61%	11.41%	0.18%	0.04%	0.52%	5.4%
028	191,223	-61	-0.03%	144,565	75.6%	25.25%	54.08%	14.25%	1.86%	0.19%	0.06%	0.68%	4.8%
029	189,424	-1,860	-0.97%	145,674	76.9%	60.71%	26.22%	5.34%	3.02%	0.23%	0.1%	0.42%	5.16%
030	191,617	333	0.17%	144,068	75.19%	63.02%	22.85%	7.93%	1.03%	0.25%	0.03%	0.56%	5.78%
031	192,560	1,276	0.67%	142,251	73.87%	65.2%	19.83%	8.85%	1.07%	0.23%	0.06%	0.58%	5.67%
032	192,448	1,164	0.61%	149,879	77.88%	63.13%	13.22%	12.09%	5.49%	0.2%	0.04%	0.91%	6.31%
033	192,766	1,482	0.77%	147,506	76.52%	34.14%	33.16%	22.55%	4.42%	0.19%	0.06%	1.26%	5.52%
034	190,668	-616	-0.32%	141,840	74.39%	11.11%	66.6%	14.82%	3.9%	0.23%	0.04%	0.6%	3.63%
035	192,472	1,188	0.62%	151,934	78.94%	27.6%	53.15%	9.94%	4.82%	0.18%	0.04%	0.71%	4.51%
036	192,282	998	0.52%	161,385	83.93%	33.1%	51.35%	7.56%	3.58%	0.17%	0.04%	0.53%	4.38%
037	192,671	1,387	0.73%	147,779	76.7%	62.38%	18.04%	9.99%	3.85%	0.16%	0.03%	0.78%	6.21%
038	192,309	1,025	0.54%	149,091	77.53%	28.22%	59.11%	7.04%	2.16%	0.14%	0.02%	0.51%	3.61%
039	192,047	763	0.40%	157,956	82.25%	29.27%	55.12%	6.6%	4.85%	0.16%	0.04%	0.59%	4.1%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
040	190,544	-740	-0.39%	147,000	77.15%	43.69%	16.42%	24.81%	10.84%	0.12%	0.04%	0.65%	4.44%
041	193,109	1,825	0.95%	147,908	76.59%	20.78%	55.88%	10.32%	8.79%	0.17%	0.02%	0.67%	4.38%
042	191,057	-227	-0.12%	144,293	75.52%	56.31%	31.85%	5.94%	1.29%	0.16%	0.05%	0.59%	5.04%
043	189,443	-1,841	-0.96%	142,037	74.98%	21.68%	61.87%	10.05%	1.83%	0.17%	0.08%	0.72%	4.81%
044	193,156	1,872	0.98%	150,410	77.87%	31.12%	51.47%	7.93%	5.05%	0.13%	0.04%	0.57%	4.74%
045	190,692	-592	-0.31%	140,706	73.79%	52.74%	17.12%	14.66%	10.69%	0.13%	0.03%	0.62%	5.44%
046	190,312	-972	-0.51%	146,713	77.09%	67.24%	16.64%	7.99%	3.77%	0.2%	0.03%	0.58%	4.62%
047	190,607	-677	-0.35%	146,599	76.91%	64.67%	16.96%	11.22%	2.66%	0.16%	0.04%	0.58%	4.82%
048	190,123	-1,161	-0.61%	136,995	72.06%	49.01%	8.35%	7.58%	30.59%	0.13%	0.04%	0.55%	5.21%
049	189,355	-1,929	-1.01%	144,123	76.11%	60.85%	7.13%	26.24%	2.15%	0.15%	0.04%	0.35%	4.05%
050	189,320	-1,964	-1.03%	148,799	78.6%	78.61%	5.05%	11.08%	1.22%	0.22%	0.04%	0.26%	4.48%
051	190,167	-1,117	-0.58%	155,571	81.81%	88.75%	0.84%	5.43%	0.59%	0.31%	0.02%	0.3%	4.6%
052	190,799	-485	-0.25%	146,620	76.85%	71.8%	12.39%	10.11%	1.08%	0.21%	0.03%	0.35%	5.23%
053	190,236	-1,048	-0.55%	148,201	77.9%	85.78%	4.46%	3.98%	1%	0.24%	0.06%	0.3%	5.37%
054	192,443	1,159	0.61%	143,843	74.75%	65.71%	2.97%	26.66%	1.14%	0.19%	0.02%	0.25%	4.11%
055	192,235	951	0.50%	145,915	75.9%	20.96%	59.87%	9.39%	5.35%	0.19%	0.03%	0.64%	4.7%
056	191,226	-58	-0.03%	144,448	75.54%	73.9%	6.36%	8.63%	5.67%	0.11%	0.03%	0.75%	6.04%

Total: 10,711,908**Ideal District: 191,284****Summary Statistics:**

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,065.93
Relative Mean Deviation:	0.56%
Standard Deviation:	1,203.73

User: S049

Plan Name: Senate-2023

Plan Type: Senate

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	61.99%	22.8%	7.55%	2.81%	0.28%	0.27%	0.4%	3.9%
002	190,408	-876	-0.46%	150,843	79.22%	40.21%	44.81%	7.48%	3.77%	0.22%	0.15%	0.42%	2.95%
003	191,212	-72	-0.04%	148,915	77.88%	68.88%	19.81%	6.17%	1.27%	0.27%	0.08%	0.34%	3.19%
004	191,098	-186	-0.10%	146,443	76.63%	66.78%	21.98%	5.52%	1.9%	0.24%	0.07%	0.33%	3.17%
005	191,921	637	0.33%	139,394	72.63%	15.69%	27.21%	41.67%	12.41%	0.14%	0.04%	0.55%	2.28%
006	191,052	-232	-0.12%	146,190	76.52%	72.32%	16.08%	5.95%	1.91%	0.21%	0.04%	0.32%	3.17%
007	189,709	-1,575	-0.82%	147,425	77.71%	37.84%	19.33%	16.56%	22.58%	0.16%	0.05%	0.55%	2.93%
008	192,396	1,112	0.58%	145,144	75.44%	60.1%	29.02%	6.21%	1.27%	0.29%	0.08%	0.27%	2.75%
009	192,915	1,631	0.85%	142,054	73.64%	35.81%	27.23%	18.77%	14.59%	0.18%	0.04%	0.59%	2.8%
010	192,983	1,699	0.89%	152,681	79.12%	25.45%	62.36%	4.69%	3.71%	0.15%	0.03%	0.56%	3.05%
011	189,976	-1,308	-0.68%	144,597	76.11%	58.97%	30.08%	7.6%	0.72%	0.26%	0.02%	0.22%	2.13%
012	190,819	-465	-0.24%	149,154	78.17%	36.71%	56.63%	3.48%	0.92%	0.18%	0.02%	0.18%	1.88%
013	189,326	-1,958	-1.02%	144,141	76.13%	64.1%	26.01%	6.01%	1.21%	0.17%	0.02%	0.21%	2.26%
014	192,533	1,249	0.65%	155,340	80.68%	57.1%	16.83%	12.13%	9.43%	0.12%	0.05%	0.74%	3.61%
015	189,446	-1,838	-0.96%	144,506	76.28%	36.52%	51.56%	6.59%	1.45%	0.23%	0.25%	0.36%	3.04%
016	191,829	545	0.28%	147,133	76.7%	66.91%	21.49%	5.03%	2.92%	0.18%	0.03%	0.42%	3.01%
017	190,000	-1,284	-0.67%	142,855	75.19%	23.55%	60.38%	7.89%	4.36%	0.2%	0.06%	0.67%	2.89%
018	191,825	541	0.28%	150,196	78.3%	60.69%	29.2%	4.51%	2.46%	0.22%	0.03%	0.29%	2.6%
019	192,316	1,032	0.54%	146,131	75.98%	53.99%	24.52%	8.38%	0.62%	0.18%	0.06%	0.2%	2.06%
020	192,588	1,304	0.68%	147,033	76.35%	61.71%	30.17%	3.49%	1.76%	0.16%	0.05%	0.25%	2.41%
021	192,572	1,288	0.67%	145,120	75.36%	73.87%	6.37%	8.77%	6.98%	0.18%	0.04%	0.48%	3.32%
022	193,163	1,879	0.98%	150,450	77.89%	34.38%	53.94%	5.35%	2.3%	0.24%	0.18%	0.38%	3.24%
023	190,344	-940	-0.49%	144,113	75.71%	56.89%	33.91%	4.52%	1.24%	0.25%	0.09%	0.27%	2.84%
024	192,674	1,390	0.73%	148,602	77.13%	69.81%	18.69%	4.4%	3.27%	0.2%	0.07%	0.35%	3.2%
025	189,469	-1,815	-0.95%	147,337	77.76%	62.87%	29.71%	3.43%	0.94%	0.18%	0.03%	0.37%	2.48%
026	189,945	-1,339	-0.70%	145,744	76.73%	36.6%	55.18%	4.24%	0.92%	0.22%	0.03%	0.24%	2.56%
027	190,676	-608	-0.32%	139,196	73%	71.5%	4.16%	10.2%	10.27%	0.15%	0.04%	0.45%	3.22%
028	191,223	-61	-0.03%	144,565	75.6%	28.4%	53.43%	12.13%	2.06%	0.2%	0.06%	0.6%	3.11%
029	189,424	-1,860	-0.97%	145,674	76.9%	63.22%	25.52%	4.45%	3%	0.23%	0.11%	0.33%	3.13%
030	191,617	333	0.17%	144,068	75.19%	65.92%	22.11%	6.63%	1.06%	0.27%	0.03%	0.47%	3.51%
031	192,560	1,276	0.67%	142,251	73.87%	68.26%	19.13%	7.42%	1.12%	0.22%	0.06%	0.46%	3.33%
032	192,448	1,164	0.61%	149,879	77.88%	65.78%	13.13%	10.55%	5.42%	0.2%	0.04%	0.83%	4.05%
033	192,766	1,482	0.77%	147,506	76.52%	38.05%	32.8%	19.51%	4.41%	0.2%	0.05%	1.23%	3.75%
034	190,668	-616	-0.32%	141,840	74.39%	13.36%	66.5%	12.75%	4.26%	0.22%	0.04%	0.56%	2.31%
035	192,472	1,188	0.62%	151,934	78.94%	30.35%	51.84%	8.72%	5.01%	0.18%	0.04%	0.69%	3.17%
036	192,282	998	0.52%	161,385	83.93%	36.18%	48.68%	7.06%	4.01%	0.17%	0.04%	0.51%	3.34%
037	192,671	1,387	0.73%	147,779	76.7%	65.37%	17.41%	8.69%	3.94%	0.17%	0.04%	0.67%	3.73%
038	192,309	1,025	0.54%	149,091	77.53%	29.82%	58.41%	6.25%	2.34%	0.15%	0.02%	0.5%	2.51%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
039	192,047	763	0.40%	157,956	82.25%	31.9%	52.78%	6.1%	5.43%	0.15%	0.04%	0.52%	3.07%
040	190,544	-740	-0.39%	147,000	77.15%	46.34%	17.32%	21.62%	11.15%	0.11%	0.04%	0.59%	2.84%
041	193,109	1,825	0.95%	147,908	76.59%	23.28%	55.63%	9.14%	8.14%	0.18%	0.02%	0.62%	2.99%
042	191,057	-227	-0.12%	144,293	75.52%	59.13%	30.78%	4.96%	1.28%	0.17%	0.04%	0.51%	3.13%
043	189,443	-1,841	-0.96%	142,037	74.98%	24.96%	60.5%	8.55%	1.94%	0.19%	0.07%	0.65%	3.13%
044	193,156	1,872	0.98%	150,410	77.87%	32.93%	51.17%	6.83%	5.41%	0.14%	0.04%	0.49%	2.99%
045	190,692	-592	-0.31%	140,706	73.79%	55.47%	16.86%	13.05%	10.89%	0.13%	0.03%	0.5%	3.07%
046	190,312	-972	-0.51%	146,713	77.09%	69.9%	15.64%	6.99%	3.85%	0.22%	0.02%	0.5%	2.89%
047	190,607	-677	-0.35%	146,599	76.91%	67.46%	16.34%	9.57%	2.79%	0.17%	0.04%	0.5%	3.13%
048	190,123	-1,161	-0.61%	136,995	72.06%	52.25%	8.26%	7%	29.05%	0.11%	0.04%	0.47%	2.83%
049	189,355	-1,929	-1.01%	144,123	76.11%	65.64%	7.12%	21.9%	2.22%	0.16%	0.04%	0.29%	2.63%
050	189,320	-1,964	-1.03%	148,799	78.6%	81.54%	5.03%	8.78%	1.24%	0.24%	0.03%	0.24%	2.91%
051	190,167	-1,117	-0.58%	155,571	81.81%	90.24%	0.84%	4.34%	0.61%	0.33%	0.02%	0.27%	3.34%
052	190,799	-485	-0.25%	146,620	76.85%	74.74%	12.08%	6.24%	1.13%	0.22%	0.02%	0.29%	3.27%
053	190,236	-1,048	-0.55%	148,201	77.9%	87.31%	4.49%	3.23%	0.99%	0.26%	0.06%	0.22%	3.44%
054	192,443	1,159	0.61%	143,843	74.75%	69.98%	3.07%	22.64%	1.15%	0.22%	0.02%	0.21%	2.71%
055	192,235	951	0.50%	145,915	75.9%	23.65%	59%	8.11%	5.37%	0.19%	0.03%	0.57%	3.08%
056	191,226	-58	-0.03%	144,448	75.54%	76.17%	6.37%	7.66%	5.51%	0.12%	0.03%	0.63%	3.51%

Total: 10,711,908**Ideal District: 191,284****Summary Statistics:**

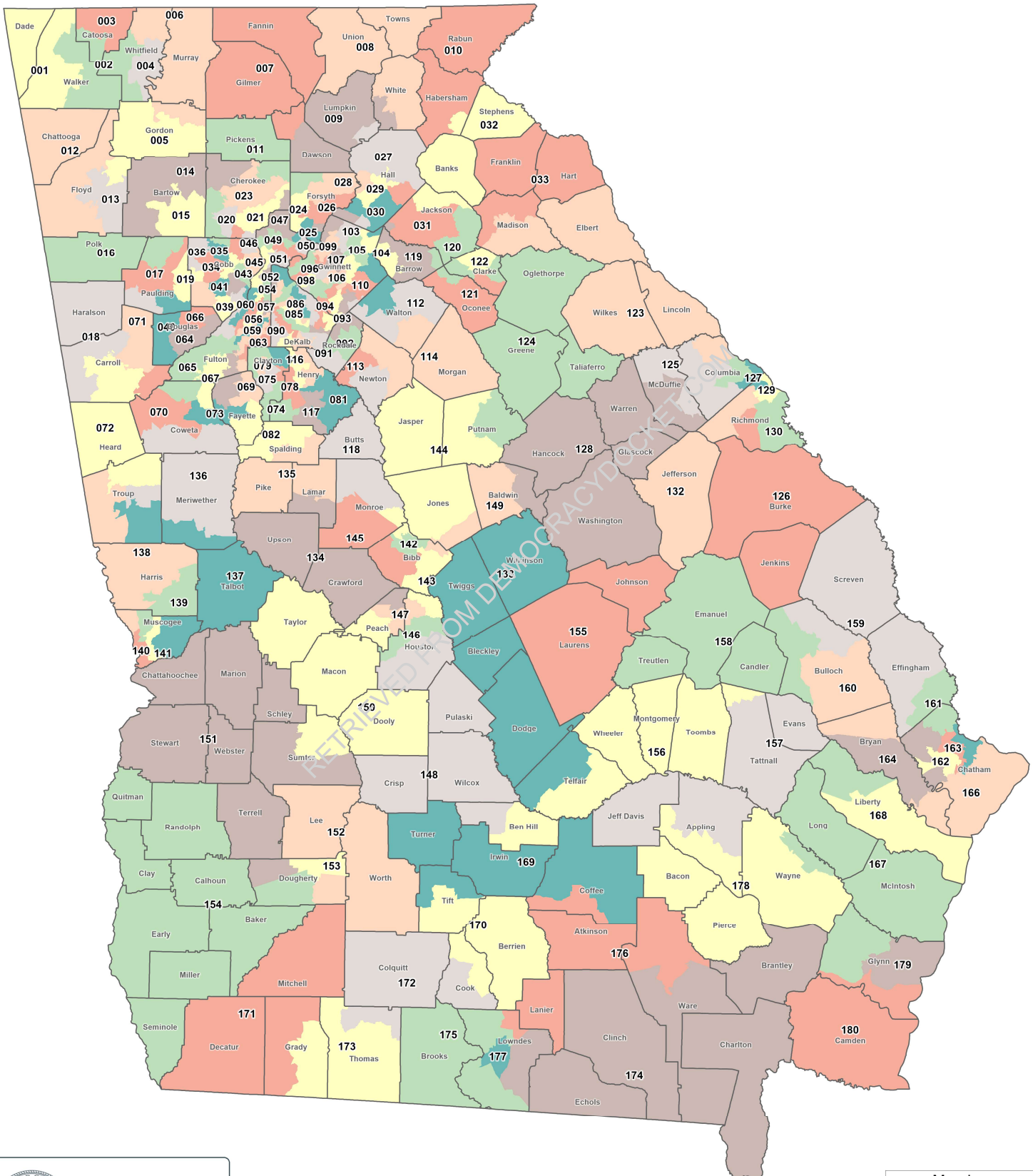
Population Range: 189,320 to 193,163
Ratio Range: 0.02
Absolute Range: -1,964 to 1,879
Absolute Overall Range: 3,843
Relative Range: -1.03% to 0.98%
Relative Overall Range: 2.01%
Absolute Mean Deviation: 1,065.93
Relative Mean Deviation: 0.56%
Standard Deviation: 1,203.73

EXHIBIT 3

RETRIEVED FROM DEMOCRACYDOCKET.COM

Proposed Georgia House Districts

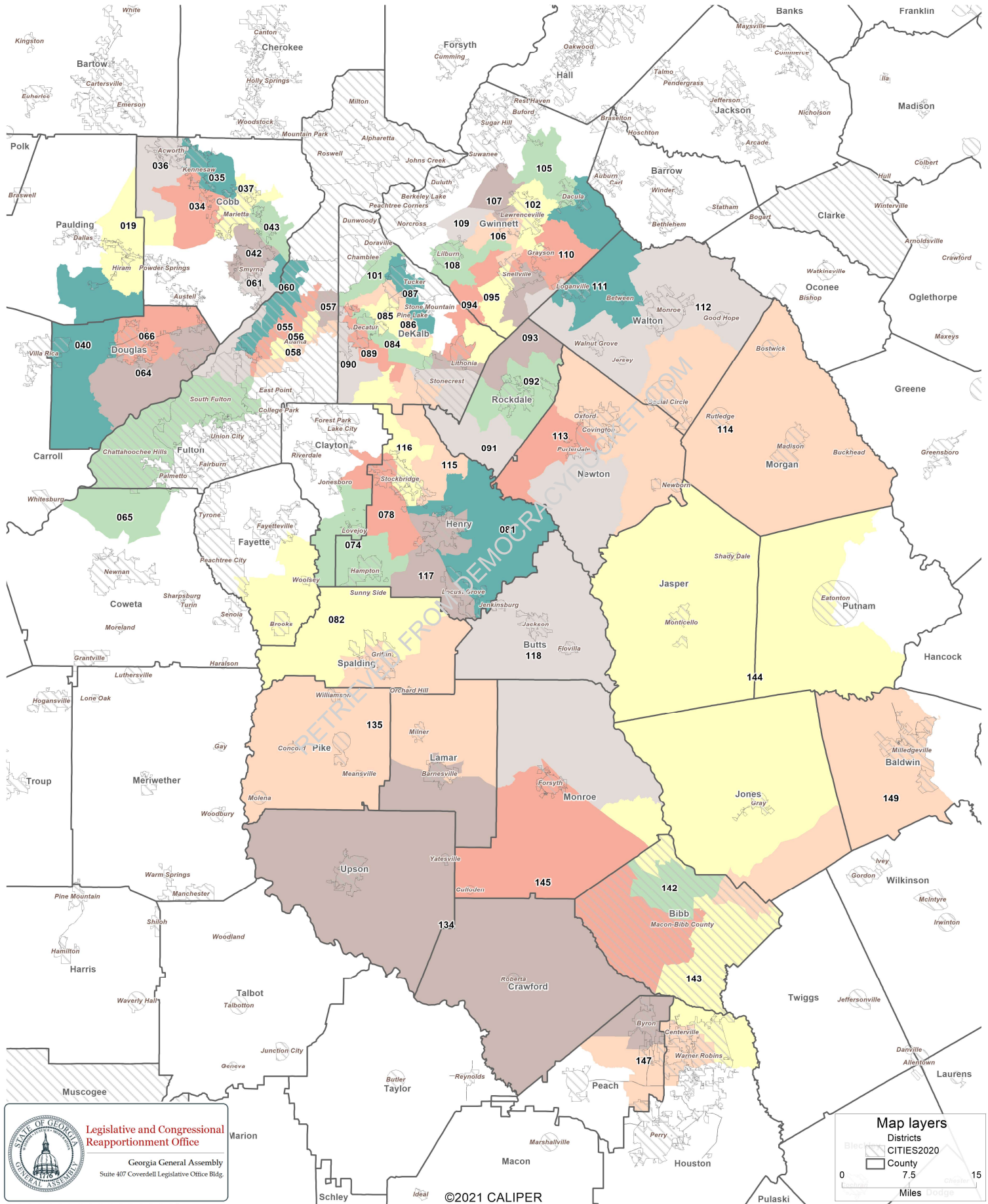
Client: H123
Plan: House-2023
Type: House



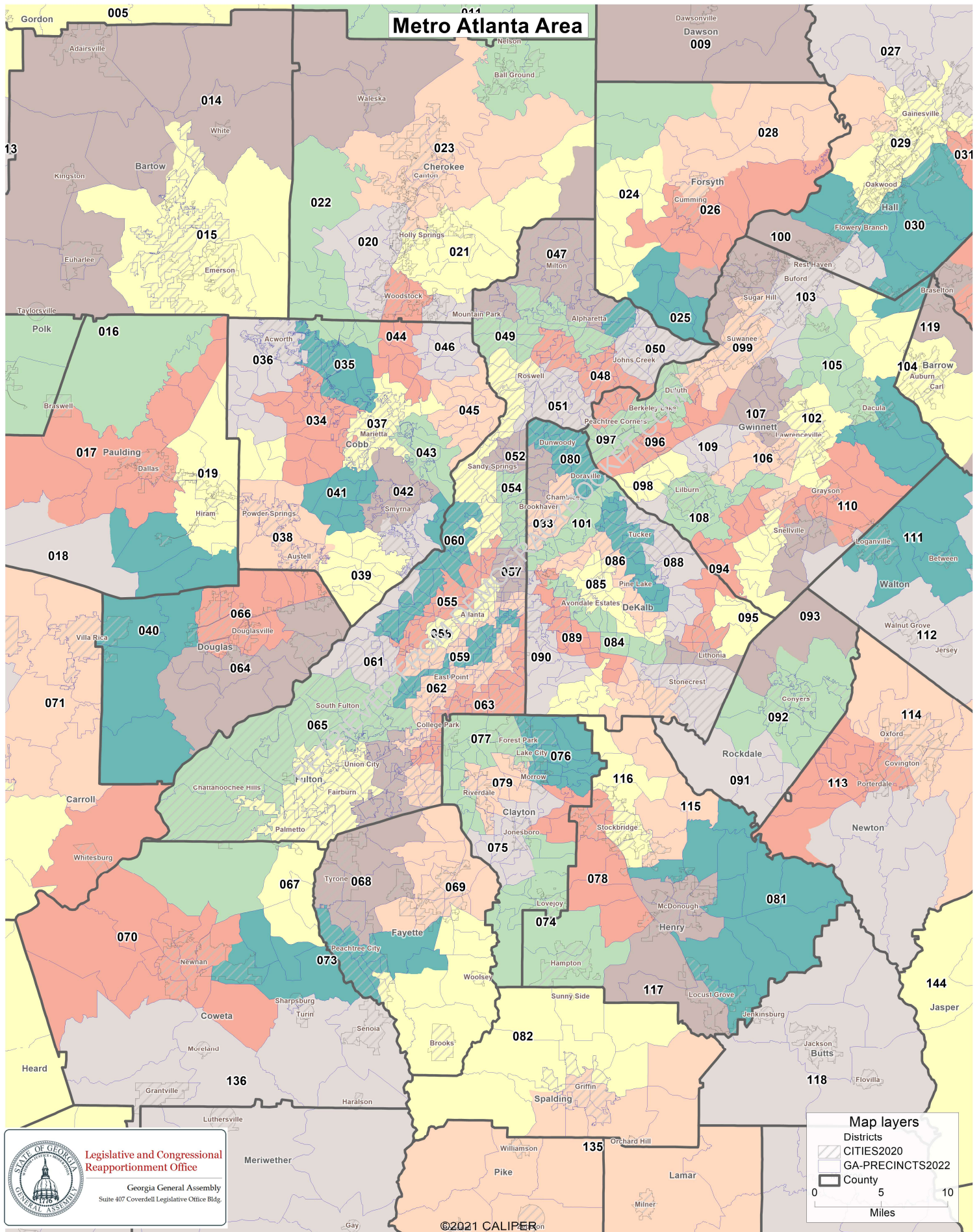
Proposed Georgia House Districts

Client: H123
Plan: House-2023
Type: House

Modified Districts

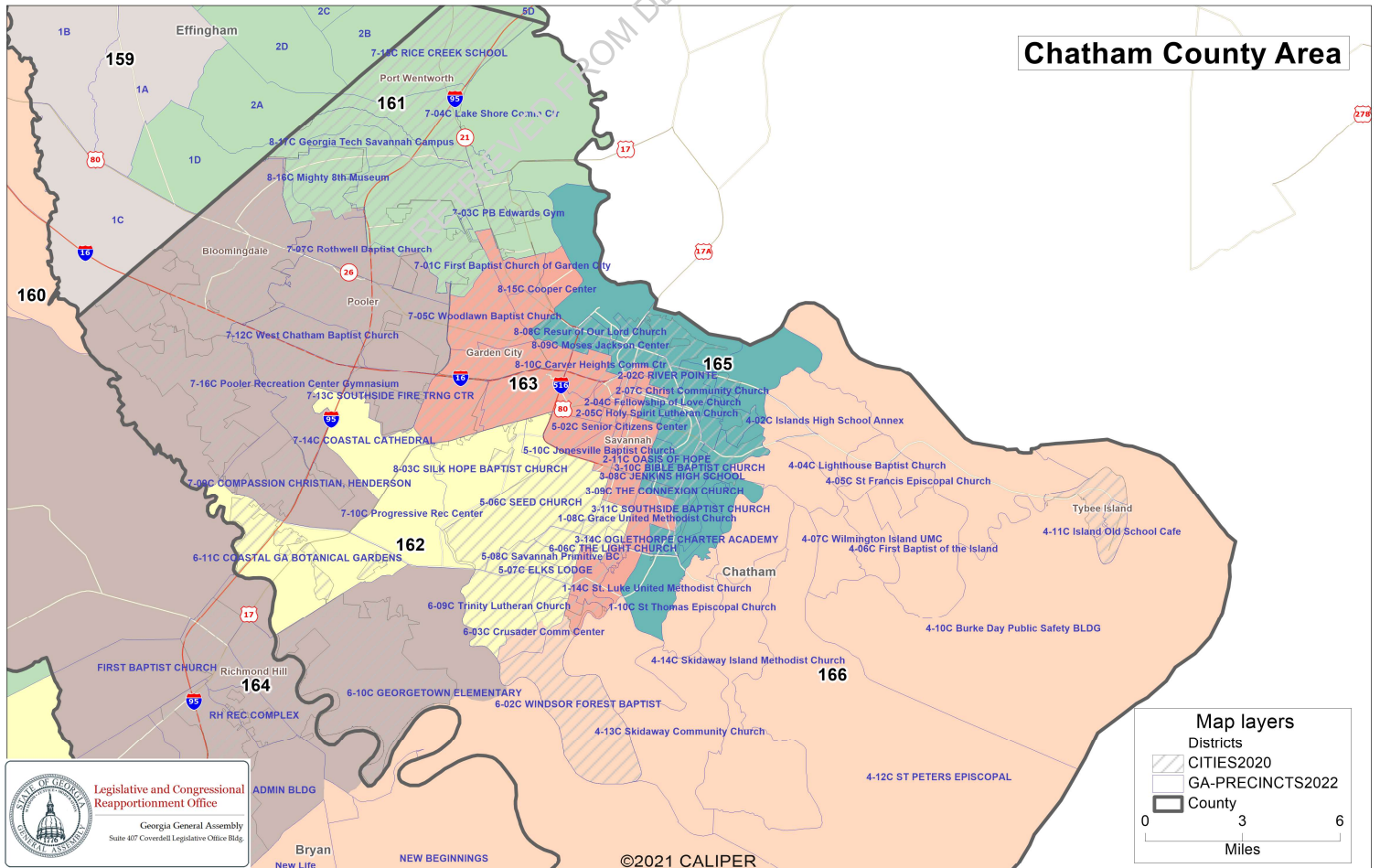
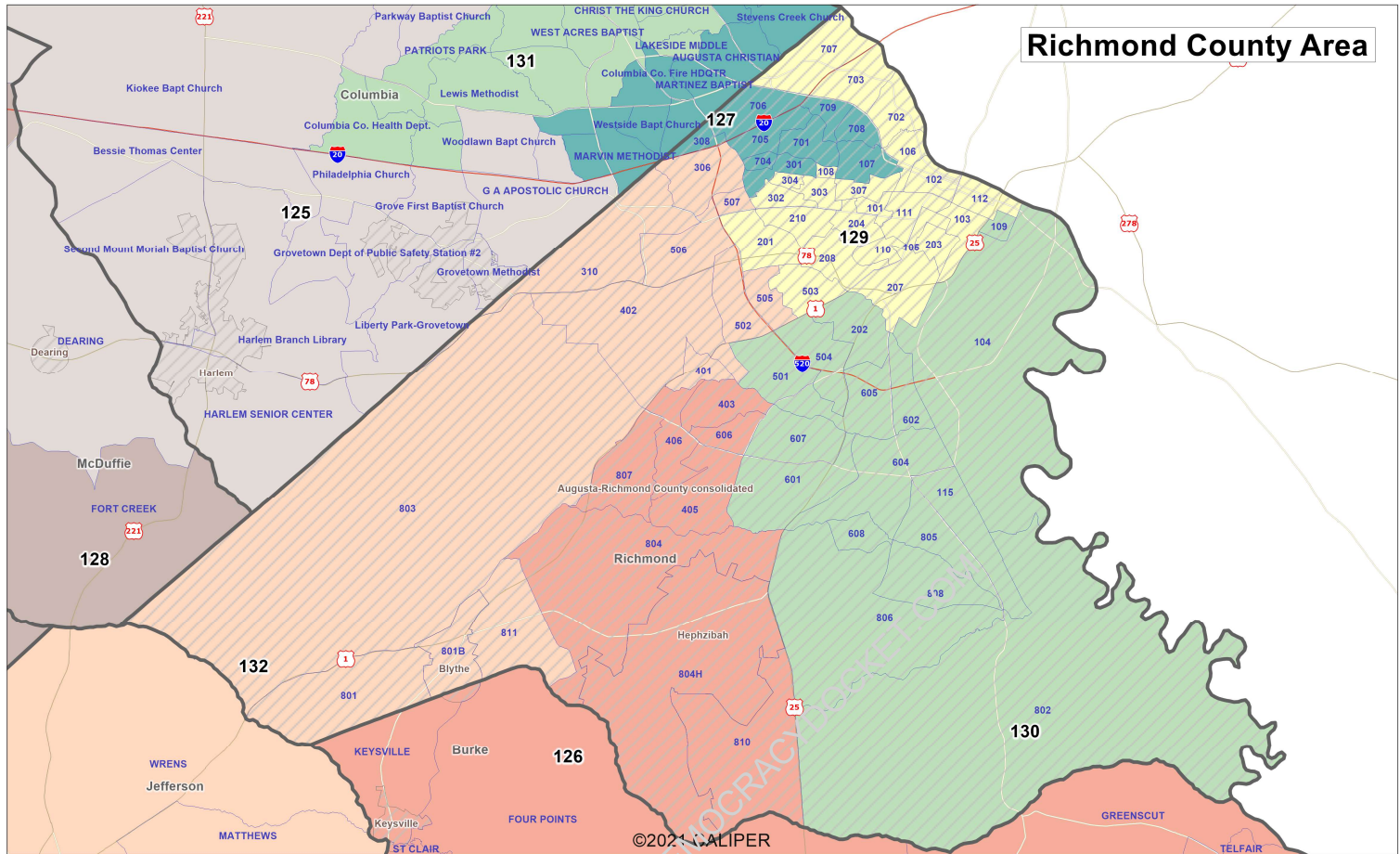


Proposed Georgia House Districts



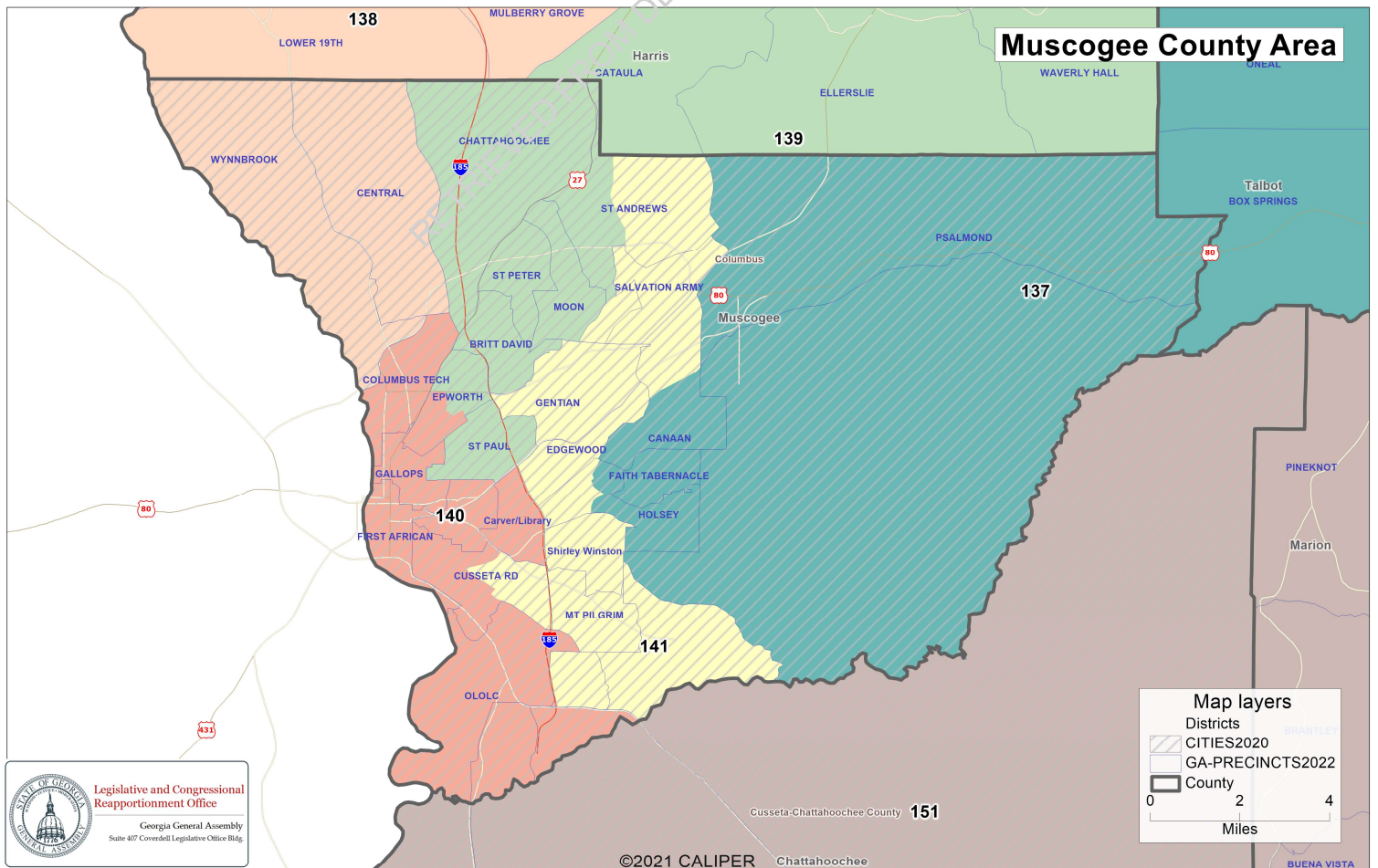
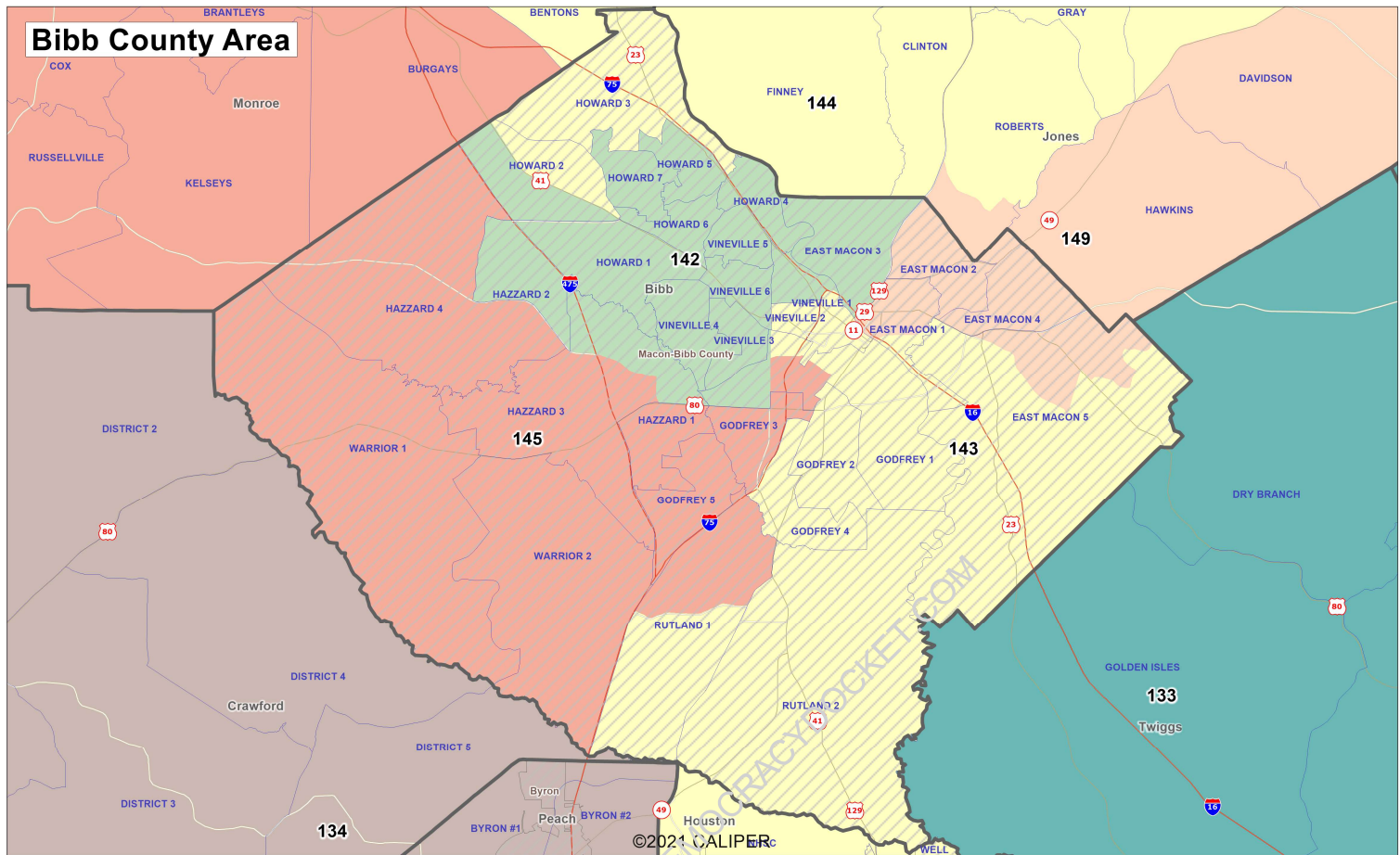
Proposed Georgia House Districts

Client: H123
Plan: House-2023
Type: House



Proposed Georgia House Districts

Client: H123
Plan: House-2023
Type: House



User: H123

Plan Name: House-2023

Plan Type: House

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	87.88%	3.9%	2.59%	0.53%	0.31%	0.04%	0.3%	5.67%
002	59,773	262	0.44%	46,159	77.22%	83.24%	2.56%	9.09%	1.1%	0.18%	0.02%	0.26%	4.6%
003	60,199	688	1.16%	46,716	77.6%	86.9%	2.82%	3.6%	1.63%	0.27%	0.14%	0.18%	5.75%
004	59,070	-441	-0.74%	42,798	72.45%	42.01%	4.17%	50.07%	1.23%	0.17%	0.02%	0.28%	2.82%
005	58,837	-674	-1.13%	44,623	75.84%	75.46%	3.76%	15.29%	1.24%	0.2%	0.02%	0.22%	5.03%
006	59,712	201	0.34%	45,152	75.62%	80.15%	1.01%	14.51%	0.51%	0.2%	0.01%	0.2%	4.5%
007	59,081	-430	-0.72%	48,771	82.55%	87.97%	0.37%	7.43%	0.45%	0.26%	0.01%	0.24%	3.96%
008	59,244	-267	-0.45%	49,612	83.74%	90.8%	1.13%	3.21%	0.54%	0.3%	0.01%	0.34%	4.39%
009	59,474	-37	-0.06%	48,273	81.17%	87.78%	1.01%	5.49%	0.79%	0.37%	0.06%	0.36%	5.11%
010	59,519	8	0.01%	47,164	79.24%	78.61%	2.97%	13.11%	1.51%	0.17%	0.06%	0.24%	4.2%
011	58,792	-719	-1.21%	45,396	77.21%	87.43%	1.55%	5.33%	1.15%	0.22%	0.02%	0.3%	5.18%
012	59,300	-211	-0.35%	46,487	78.39%	78.45%	8.61%	7.68%	1.01%	0.16%	0.01%	0.42%	4.69%
013	59,150	-361	-0.61%	45,176	76.38%	62.24%	18.71%	13.52%	1.29%	0.22%	0.03%	0.33%	4.77%
014	59,135	-376	-0.63%	45,511	76.96%	81.38%	5.86%	7.04%	0.77%	0.21%	0.03%	0.34%	5.66%
015	59,213	-298	-0.50%	45,791	77.33%	68.38%	13.61%	11.74%	1.3%	0.25%	0.04%	0.49%	5.42%
016	59,402	-109	-0.18%	44,009	74.09%	72.9%	11.15%	10.95%	0.76%	0.22%	0.05%	0.43%	4.78%
017	59,120	-391	-0.66%	42,761	72.33%	63.28%	22.06%	7.9%	1.33%	0.23%	0.07%	0.64%	6.21%
018	59,335	-176	-0.30%	45,159	76.11%	84.78%	7.11%	2.93%	0.59%	0.23%	0.04%	0.35%	5.22%
019	59,752	241	0.40%	44,754	74.9%	59.73%	25.38%	7.91%	1.57%	0.22%	0.08%	0.67%	5.93%
020	60,107	596	1.00%	45,725	76.07%	73.33%	8.13%	10.6%	1.97%	0.16%	0.04%	0.63%	5.97%
021	59,529	18	0.03%	44,931	75.48%	80.04%	4.29%	8.54%	1.84%	0.19%	0.04%	0.66%	5.83%
022	59,460	-51	-0.09%	45,815	77.05%	62.53%	13.94%	13.26%	3.86%	0.2%	0.03%	0.81%	6.97%
023	59,048	-463	-0.78%	44,254	74.95%	71.47%	5.64%	17.19%	1.06%	0.22%	0.04%	0.36%	5.35%
024	59,011	-500	-0.84%	41,814	70.86%	60.13%	6%	11.36%	17.65%	0.21%	0.04%	0.62%	5.62%
025	59,414	-97	-0.16%	42,520	71.57%	51.99%	5%	5.42%	33.55%	0.15%	0.03%	0.51%	4.7%
026	59,248	-263	-0.44%	44,081	74.4%	63.48%	3.29%	12.07%	16.8%	0.18%	0.04%	0.5%	4.9%
027	58,795	-716	-1.20%	46,004	78.24%	79.69%	3.22%	11.82%	0.82%	0.19%	0.04%	0.3%	5%
028	58,972	-539	-0.91%	44,444	75.36%	76.5%	3.39%	13.59%	2.06%	0.16%	0.03%	0.4%	5.13%
029	59,200	-311	-0.52%	43,131	72.86%	36.05%	12.13%	46.28%	2.72%	0.12%	0.06%	0.41%	3.06%
030	59,266	-245	-0.41%	45,414	76.63%	67.03%	7.37%	18.78%	3.04%	0.15%	0.03%	0.34%	4.26%
031	59,901	390	0.66%	43,120	71.99%	65.57%	6.64%	21.63%	2.27%	0.19%	0.02%	0.37%	4.59%
032	59,145	-366	-0.62%	45,942	77.68%	80.8%	7.24%	6.03%	1.26%	0.29%	0.05%	0.25%	5.26%
033	59,187	-324	-0.54%	46,498	78.56%	79.94%	10.97%	4.08%	1.2%	0.15%	0.01%	0.36%	4.19%
034	58,947	-564	-0.95%	44,933	76.23%	65.67%	16.18%	8.47%	4.35%	0.11%	0.03%	0.7%	5.89%
035	59,689	178	0.30%	48,436	81.15%	46.08%	29.39%	12.14%	5.79%	0.2%	0.04%	1.11%	6.46%
036	59,898	387	0.65%	45,316	75.66%	66.72%	14.67%	9.61%	3.49%	0.17%	0.04%	0.69%	6.09%
037	58,927	-584	-0.98%	46,057	78.16%	44.33%	22.71%	22.5%	5.45%	0.21%	0.06%	0.87%	4.96%
038	59,317	-194	-0.33%	44,839	75.59%	25.93%	52.72%	14.72%	1.77%	0.22%	0.07%	0.7%	5.13%
039	59,381	-130	-0.22%	44,436	74.83%	20.6%	52.08%	21.79%	1.5%	0.14%	0.03%	0.65%	4.28%

Population Summary

House-2023

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
040	60,184	673	1.13%	45,134	74.99%	60.16%	25.13%	8%	1.12%	0.25%	0.04%	0.7%	6.16%
041	60,122	611	1.03%	45,271	75.3%	23.42%	36.44%	33.22%	2.81%	0.18%	0.05%	0.86%	4.01%
042	59,017	-494	-0.83%	46,520	78.82%	39.33%	28.51%	21.47%	5.43%	0.21%	0.03%	0.79%	5.35%
043	59,626	115	0.19%	48,172	80.79%	41.11%	28.2%	13.47%	7.96%	0.21%	0.06%	2.71%	7.76%
044	60,002	491	0.83%	46,773	77.95%	64.71%	10.98%	11.99%	5.71%	0.18%	0.02%	1.17%	6.72%
045	59,738	227	0.38%	44,023	73.69%	72.29%	4.14%	5.5%	12.94%	0.07%	0.02%	0.67%	5.94%
046	59,108	-403	-0.68%	44,132	74.66%	72.43%	6.76%	8.24%	6.93%	0.12%	0.04%	0.82%	6.24%
047	59,126	-385	-0.65%	43,932	74.3%	61.71%	9.44%	7.83%	15.91%	0.2%	0.03%	0.7%	5.62%
048	59,003	-508	-0.85%	44,779	75.89%	59.05%	10.16%	14.1%	11.77%	0.08%	0.05%	0.64%	5.49%
049	59,153	-358	-0.60%	45,263	76.52%	68.94%	7.2%	7.56%	11.41%	0.1%	0.02%	0.68%	5.34%
050	59,523	12	0.02%	43,940	73.82%	41.55%	11.04%	7.06%	35.46%	0.09%	0.04%	0.66%	5.56%
051	58,952	-559	-0.94%	47,262	80.17%	51.02%	21.93%	15.47%	5.83%	0.17%	0.04%	1.03%	5.63%
052	59,811	300	0.50%	48,525	81.13%	53.81%	13.71%	7.98%	19.72%	0.14%	0.06%	0.72%	4.76%
053	59,953	442	0.74%	46,944	78.3%	70.3%	12.31%	8.2%	4.46%	0.1%	0.02%	0.63%	5.08%
054	60,083	572	0.96%	50,338	83.78%	61.03%	12.98%	15.17%	6.51%	0.14%	0.03%	0.57%	4.25%
055	59,115	-396	-0.67%	48,584	82.19%	33.22%	55.39%	5.01%	2.68%	0.18%	0.03%	0.41%	3.76%
056	59,783	272	0.46%	53,358	89.25%	31.46%	49.94%	5.62%	8.51%	0.17%	0.08%	0.45%	4.21%
057	58,961	-550	-0.92%	51,824	87.9%	62.15%	15.54%	8.66%	8.42%	0.1%	0.03%	0.62%	5.1%
058	58,788	-723	-1.21%	50,073	85.18%	29.83%	57.64%	5.57%	2.93%	0.16%	0.01%	0.53%	3.91%
059	59,434	-77	-0.13%	49,179	82.75%	19.37%	69.55%	4.45%	2.52%	0.16%	0.02%	0.56%	4.06%
060	59,560	49	0.08%	46,156	77.49%	35.19%	51.55%	6.53%	2.82%	0.15%	0.06%	0.44%	4.19%
061	59,161	-350	-0.59%	47,510	80.31%	30.21%	53.86%	5.03%	6.36%	0.17%	0.02%	0.66%	4.58%
062	59,450	-61	-0.10%	46,426	78.09%	17.17%	70.09%	7.61%	1.13%	0.21%	0.04%	0.53%	4.12%
063	59,381	-130	-0.22%	45,043	75.85%	15.74%	68%	10.42%	1.32%	0.21%	0.03%	0.51%	3.66%
064	59,608	97	0.16%	44,900	75.33%	33.02%	50.97%	9.21%	1.79%	0.18%	0.04%	0.76%	5.35%
065	59,129	-382	-0.64%	44,495	75.25%	23.03%	69%	3.54%	0.74%	0.14%	0.03%	0.51%	3.99%
066	60,306	795	1.34%	45,228	75%	27.26%	52.53%	14.01%	1.33%	0.26%	0.11%	0.68%	5.09%
067	59,135	-376	-0.63%	44,299	74.91%	29.09%	57.14%	8.71%	1.29%	0.18%	0.03%	0.5%	4.08%
068	59,477	-34	-0.06%	44,835	75.38%	31.15%	54.67%	7.3%	2.79%	0.16%	0.04%	0.7%	4.23%
069	58,682	-829	-1.39%	45,548	77.62%	24.1%	61.87%	6.47%	3.04%	0.17%	0.04%	0.89%	4.4%
070	59,121	-390	-0.66%	45,249	76.54%	56.51%	27.61%	9.08%	2.17%	0.2%	0.05%	0.47%	5.1%
071	59,538	27	0.05%	44,582	74.88%	67.15%	18.89%	7.44%	0.96%	0.25%	0.02%	0.51%	6.39%
072	59,660	149	0.25%	46,229	77.49%	67.26%	19.34%	8.16%	0.96%	0.2%	0.02%	0.3%	4.83%
073	60,036	525	0.88%	45,736	76.18%	69.92%	11.27%	7.96%	5.88%	0.15%	0.03%	0.52%	5.6%
074	59,120	-391	-0.66%	44,044	74.5%	20.91%	64.28%	8.85%	1.88%	0.19%	0.03%	0.62%	4.36%
075	59,743	232	0.39%	43,850	73.4%	9.24%	71.27%	12.97%	2.66%	0.19%	0.06%	0.71%	3.95%
076	59,759	248	0.42%	44,371	74.25%	8.61%	64.24%	15.61%	8.11%	0.19%	0.04%	0.57%	3.55%
077	59,242	-269	-0.45%	44,207	74.62%	6.22%	72.49%	14.22%	4.03%	0.22%	0.06%	0.5%	3.04%
078	59,734	223	0.37%	45,718	76.54%	21.3%	57.21%	10.48%	6.57%	0.21%	0.05%	0.71%	4.55%
079	59,500	-11	-0.02%	43,223	72.64%	5.69%	68.19%	18.11%	4.87%	0.21%	0.01%	0.57%	3.22%
080	59,461	-50	-0.08%	44,784	75.32%	45.02%	11.65%	26.17%	13.02%	0.08%	0.04%	0.63%	4.5%
081	58,919	-592	-0.99%	43,235	73.38%	63.13%	24.4%	5.77%	1.71%	0.18%	0.03%	0.56%	5.76%
082	59,789	278	0.47%	46,252	77.36%	62.38%	25.52%	5.76%	1.87%	0.22%	0.03%	0.45%	4.88%
083	59,416	-95	-0.16%	46,581	78.4%	44.13%	12.06%	33.75%	6.29%	0.1%	0.02%	0.61%	3.87%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
084	58,801	-710	-1.19%	46,355	78.83%	33.58%	53.22%	4.59%	3.76%	0.15%	0.03%	0.58%	5.19%
085	59,591	80	0.13%	46,239	77.59%	25.18%	49.43%	6.64%	13.95%	0.27%	0.02%	0.65%	4.98%
086	59,153	-358	-0.60%	45,107	76.25%	26.13%	53.45%	5.3%	10.63%	0.12%	0.03%	0.77%	4.69%
087	59,684	173	0.29%	46,046	77.15%	24.23%	51.81%	11.19%	8.4%	0.19%	0.02%	0.64%	4.57%
088	59,689	178	0.30%	46,073	77.19%	15.98%	60.71%	11.46%	7.49%	0.23%	0.06%	0.68%	4.39%
089	60,231	720	1.21%	48,361	80.29%	33.53%	53.85%	3.97%	3.96%	0.15%	0.04%	0.5%	4.98%
090	59,856	345	0.58%	48,477	80.99%	38.35%	50.05%	5.02%	2.07%	0.12%	0.03%	0.56%	4.7%
091	59,976	465	0.78%	46,174	76.99%	17.46%	73.28%	4.25%	0.97%	0.14%	0.02%	0.64%	4.21%
092	60,150	639	1.07%	45,550	75.73%	19.45%	66.81%	7.88%	1.67%	0.2%	0.1%	0.58%	4.38%
093	60,290	779	1.31%	45,092	74.79%	18.77%	62.38%	12.66%	1.92%	0.14%	0.02%	0.72%	4.53%
094	60,192	681	1.14%	45,155	75.02%	22.32%	54.63%	8.93%	9.59%	0.17%	0.02%	0.66%	4.91%
095	58,992	-519	-0.87%	43,421	73.6%	16.37%	63.95%	11.41%	3.58%	0.18%	0.05%	0.73%	5.08%
096	59,515	4	0.01%	44,671	75.06%	17.47%	20.71%	40.49%	17.64%	0.15%	0.06%	0.72%	3.68%
097	59,072	-439	-0.74%	46,339	78.44%	33.19%	25.12%	21.56%	15%	0.19%	0.05%	0.68%	5%
098	59,998	487	0.82%	42,734	71.23%	9.69%	19.56%	57.42%	10.69%	0.13%	0.05%	0.6%	2.61%
099	59,850	339	0.57%	45,004	75.19%	39.77%	13.49%	9.52%	32.49%	0.15%	0.04%	0.56%	5.29%
100	60,030	519	0.87%	42,669	71.08%	55.88%	9.01%	10.85%	19.49%	0.18%	0.05%	0.53%	5.64%
101	59,240	-271	-0.46%	47,353	79.93%	46.13%	17.92%	23%	8.5%	0.16%	0.02%	0.66%	4.53%
102	60,038	527	0.89%	44,409	73.97%	26.6%	38.73%	23.27%	7.01%	0.19%	0.03%	0.7%	4.7%
103	60,197	686	1.15%	44,399	73.76%	49.51%	15.16%	19.06%	11.68%	0.13%	0.04%	0.61%	5.16%
104	59,362	-149	-0.25%	43,306	72.95%	60.44%	15.61%	12.64%	6.32%	0.16%	0.04%	0.6%	5.75%
105	59,395	-116	-0.19%	43,980	74.05%	43.4%	22.33%	17.08%	12.47%	0.11%	0.01%	0.66%	5.33%
106	59,981	470	0.79%	44,518	74.22%	26.65%	25.45%	27.75%	16.44%	0.15%	0.04%	0.59%	3.94%
107	60,033	522	0.88%	46,162	76.89%	30.41%	23.26%	23.86%	17.95%	0.18%	0.05%	0.67%	4.7%
108	58,942	-569	-0.96%	44,123	74.86%	41.48%	16.47%	20.49%	17.04%	0.18%	0.02%	0.64%	4.91%
109	59,697	186	0.31%	44,206	74.05%	12.04%	29.5%	42.46%	12.62%	0.16%	0.03%	0.66%	3.41%
110	60,278	767	1.29%	43,324	71.87%	34.09%	42.68%	13.04%	4.85%	0.18%	0.05%	0.86%	5.9%
111	59,900	389	0.65%	43,967	73.4%	59.45%	23.1%	10.26%	2.49%	0.18%	0.04%	0.66%	5.2%
112	60,167	656	1.10%	45,446	75.53%	64.07%	24.15%	5.73%	1.5%	0.19%	0.06%	0.63%	4.85%
113	59,413	-98	-0.16%	44,248	74.48%	27.04%	59.61%	7.42%	1.02%	0.18%	0.14%	0.74%	5.18%
114	59,401	-110	-0.18%	45,971	77.39%	67.82%	23.48%	4.08%	0.82%	0.15%	0.03%	0.43%	4.13%
115	59,381	-130	-0.22%	46,468	78.25%	16.54%	72.48%	4.75%	1.84%	0.14%	0.02%	0.81%	4.37%
116	59,777	266	0.45%	45,550	76.2%	15.62%	71.99%	5.74%	2.74%	0.19%	0.06%	0.59%	4.04%
117	59,533	22	0.04%	43,634	73.29%	23.76%	61.03%	8.42%	2%	0.15%	0.08%	0.73%	5.24%
118	59,901	390	0.66%	46,298	77.29%	62.66%	28.32%	4.06%	0.5%	0.16%	0.05%	0.57%	4.76%
119	58,947	-564	-0.95%	44,005	74.65%	66.88%	12.47%	12.17%	3.83%	0.16%	0.02%	0.58%	5.21%
120	58,982	-529	-0.89%	46,767	79.29%	69.85%	13.48%	8.42%	4.05%	0.15%	0.05%	0.5%	4.41%
121	59,127	-384	-0.65%	46,598	78.81%	75.06%	8.66%	6.27%	5.64%	0.11%	0%	0.53%	4.74%
122	59,632	121	0.20%	48,840	81.9%	49.13%	30.63%	13.78%	2.13%	0.28%	0.06%	0.86%	3.82%
123	59,282	-229	-0.38%	46,572	78.56%	65.88%	23.82%	5.33%	1.14%	0.17%	0.02%	0.26%	4.31%
124	59,221	-290	-0.49%	47,638	80.44%	61.53%	26.06%	7.57%	1.14%	0.19%	0.02%	0.37%	3.88%
125	60,137	626	1.05%	43,812	72.85%	60%	21.67%	8.93%	2.4%	0.29%	0.19%	0.52%	8.22%
126	59,260	-251	-0.42%	45,497	76.78%	37.81%	53.88%	3.63%	0.76%	0.27%	0.15%	0.37%	4.08%
127	58,678	-833	-1.40%	45,889	78.2%	65.92%	17.12%	5.58%	5.63%	0.18%	0.18%	0.51%	6.23%

Population Summary

House-2023

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
128	58,864	-647	-1.09%	46,488	78.98%	44.14%	51%	1.91%	0.36%	0.19%	0.03%	0.17%	2.81%
129	58,829	-682	-1.15%	46,873	79.68%	33.83%	54.95%	4.74%	2.1%	0.21%	0.14%	0.43%	4.52%
130	59,203	-308	-0.52%	44,019	74.35%	30.19%	60.27%	4.33%	0.79%	0.24%	0.16%	0.42%	4.84%
131	58,890	-621	-1.04%	42,968	72.96%	65.57%	15.99%	7.07%	4.92%	0.19%	0.14%	0.61%	7.55%
132	59,142	-369	-0.62%	46,752	79.05%	33.1%	51.88%	7.91%	2.38%	0.26%	0.19%	0.37%	4.95%
133	58,893	-618	-1.04%	46,821	79.5%	60.01%	31.14%	5.61%	0.57%	0.17%	0.03%	0.2%	2.86%
134	59,575	64	0.11%	47,005	78.9%	65.16%	27.07%	3.11%	0.6%	0.25%	0.02%	0.38%	4.33%
135	59,870	359	0.60%	45,706	76.34%	68.94%	23.22%	3.27%	0.66%	0.17%	0.02%	0.35%	4.4%
136	59,298	-213	-0.36%	45,367	76.51%	62.16%	28%	4.4%	1.54%	0.24%	0.03%	0.42%	4.19%
137	59,551	40	0.07%	45,358	76.17%	38.1%	51.27%	5.17%	1.66%	0.12%	0.14%	0.37%	4.16%
138	58,912	-599	-1.01%	45,684	77.55%	70.29%	18.77%	4.1%	2.39%	0.25%	0.06%	0.36%	4.86%
139	59,010	-501	-0.84%	45,522	77.14%	63.55%	19.18%	7.24%	4.03%	0.25%	0.21%	0.59%	6.43%
140	59,294	-217	-0.36%	44,411	74.9%	28.76%	55.8%	9.04%	1.02%	0.27%	0.24%	0.53%	5.8%
141	59,019	-492	-0.83%	44,677	75.7%	29.41%	54.88%	7.93%	2.53%	0.24%	0.3%	0.45%	5.62%
142	59,312	-199	-0.33%	45,355	76.47%	38.73%	52.19%	5.47%	1.89%	0.18%	0.03%	0.38%	4.09%
143	59,432	-79	-0.13%	45,411	76.41%	36%	50.52%	8.04%	1.07%	0.23%	0.04%	0.35%	4.91%
144	59,307	-204	-0.34%	46,029	77.61%	70.22%	20.48%	3.96%	1.77%	0.18%	0.02%	0.28%	4%
145	58,805	-706	-1.19%	45,090	76.68%	39.37%	51.02%	4.76%	1.78%	0.15%	0.01%	0.44%	3.23%
146	60,203	692	1.16%	44,589	74.06%	59.32%	26.73%	5.66%	2.67%	0.17%	0.09%	0.45%	6.63%
147	60,375	864	1.45%	46,125	76.4%	53.61%	22.37%	7.91%	4.7%	0.23%	0.07%	0.52%	6.01%
148	59,984	473	0.79%	46,614	77.71%	58.49%	33.89%	3.66%	0.9%	0.12%	0.04%	0.28%	3.39%
149	59,715	204	0.34%	47,261	79.14%	42.45%	50.98%	2.4%	1.06%	0.15%	0.05%	0.39%	3.19%
150	59,276	-235	-0.39%	47,050	79.37%	36.15%	53.23%	7.23%	1.17%	0.17%	0.03%	0.17%	2.34%
151	60,059	548	0.92%	46,973	78.21%	45.21%	42.21%	7.51%	1.29%	0.18%	0.23%	0.25%	3.98%
152	60,134	623	1.05%	46,026	76.54%	66.12%	25.86%	2.84%	1.6%	0.21%	0.03%	0.3%	3.96%
153	59,299	-212	-0.36%	45,692	77.05%	24.38%	69.08%	2.93%	0.89%	0.13%	0.02%	0.24%	3.02%
154	59,994	483	0.81%	47,273	78.8%	39.54%	55.53%	2.1%	0.38%	0.16%	0.01%	0.2%	2.65%
155	58,759	-752	-1.26%	45,208	76.94%	57.32%	36.14%	2.62%	0.91%	0.18%	0.05%	0.26%	3.27%
156	59,444	-67	-0.11%	45,867	77.16%	58.49%	29.79%	8.27%	0.6%	0.17%	0.01%	0.25%	3.14%
157	59,957	446	0.75%	45,311	75.57%	61.81%	23.59%	11.19%	0.54%	0.16%	0.04%	0.21%	3.26%
158	59,440	-71	-0.12%	45,549	76.63%	59.27%	31.5%	5.6%	0.75%	0.18%	0.03%	0.25%	3.16%
159	59,895	384	0.65%	44,871	74.92%	67.46%	23.88%	3.65%	0.54%	0.28%	0.03%	0.34%	5.1%
160	59,935	424	0.71%	48,057	80.18%	66.84%	21.68%	5.5%	1.62%	0.24%	0.1%	0.28%	4.69%
161	60,097	586	0.98%	44,371	73.83%	57.53%	25.83%	7.89%	3.03%	0.24%	0.09%	0.5%	6.63%
162	60,308	797	1.34%	46,733	77.49%	36.7%	43.34%	10.78%	4%	0.2%	0.24%	0.54%	5.41%
163	60,123	612	1.03%	48,461	80.6%	38.48%	46.14%	8.45%	3.12%	0.19%	0.13%	0.39%	3.84%
164	60,101	590	0.99%	45,851	76.29%	57.7%	22.03%	9.95%	4.21%	0.24%	0.12%	0.68%	6.66%
165	59,978	467	0.78%	48,247	80.44%	35.1%	52.41%	5.53%	3.19%	0.22%	0.14%	0.38%	3.76%
166	60,242	731	1.23%	47,580	78.98%	82.79%	4.94%	5.19%	2.65%	0.16%	0.05%	0.4%	4.84%
167	59,493	-18	-0.03%	44,140	74.19%	62.89%	20.99%	8.81%	1.42%	0.35%	0.23%	0.5%	6.46%
168	60,147	636	1.07%	44,867	74.6%	36.24%	43.3%	11.22%	1.98%	0.31%	0.67%	0.48%	7.77%
169	59,138	-373	-0.63%	45,267	76.54%	58.36%	28.84%	9.03%	0.79%	0.15%	0.02%	0.2%	3.4%
170	60,116	605	1.02%	45,316	75.38%	60.65%	24.39%	10.43%	1.19%	0.13%	0.02%	0.28%	3.86%
171	59,237	-274	-0.46%	45,969	77.6%	51.23%	39.79%	5.73%	0.54%	0.21%	0.03%	0.21%	2.92%

Population Summary

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
172	59,961	450	0.76%	44,756	74.64%	57.24%	23.26%	16%	0.77%	0.21%	0.03%	0.23%	3.05%
173	59,743	232	0.39%	45,292	75.81%	52.67%	36.22%	6.95%	0.79%	0.33%	0.02%	0.3%	3.59%
174	59,852	341	0.57%	45,760	76.46%	70.83%	16.91%	7.88%	0.47%	0.35%	0.04%	0.22%	4.31%
175	59,993	482	0.81%	44,704	74.52%	64.08%	23.75%	6.1%	1.78%	0.26%	0.07%	0.34%	4.88%
176	59,470	-41	-0.07%	44,991	75.65%	63.56%	21.74%	9.95%	0.91%	0.24%	0.08%	0.29%	4.27%
177	59,992	481	0.81%	46,014	76.7%	33.22%	54.7%	6.69%	1.26%	0.21%	0.07%	0.42%	4.46%
178	59,877	366	0.62%	45,638	76.22%	75.62%	14.4%	6.22%	0.52%	0.18%	0.01%	0.29%	3.62%
179	59,356	-155	-0.26%	47,156	79.45%	59.03%	28.39%	7.73%	1.06%	0.17%	0.13%	0.39%	3.92%
180	59,412	-99	-0.17%	45,362	76.35%	68.71%	16.96%	6.47%	1.56%	0.32%	0.11%	0.57%	6.94%

Total: 10,711,908**Ideal District: 59,511****Summary Statistics:**

Population Range: 58,678 to 60,375
Ratio Range: 0.03
Absolute Range: -833 to 864
Absolute Overall Range: 1,697
Relative Range: -1.40% to 1.45%
Relative Overall Range: 2.85%
Absolute Mean Deviation: 372.39
Relative Mean Deviation: 0.63%
Standard Deviation: 433.63

User: H123

Plan Name: House-2023

Plan Type: House

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	89.43%	3.65%	2.11%	0.57%	0.32%	0.05%	0.21%	3.65%
002	59,773	262	0.44%	46,159	77.22%	85.33%	2.64%	7.57%	1.07%	0.2%	0.02%	0.2%	2.97%
003	60,199	688	1.16%	46,716	77.6%	88.46%	2.71%	2.96%	1.56%	0.28%	0.14%	0.14%	3.77%
004	59,070	-441	-0.74%	42,798	72.45%	47.78%	4.53%	44.13%	1.28%	0.19%	0.02%	0.21%	1.86%
005	58,837	-674	-1.13%	44,623	75.84%	78.55%	3.81%	12.62%	1.26%	0.22%	0.03%	0.19%	3.31%
006	59,712	201	0.34%	45,152	75.62%	83%	1%	11.96%	0.51%	0.25%	0.02%	0.17%	3.09%
007	59,081	-430	-0.72%	48,771	82.55%	90.15%	0.34%	5.53%	0.46%	0.27%	0.01%	0.21%	3.02%
008	59,244	-267	-0.45%	49,612	83.74%	91.87%	1.12%	2.74%	0.54%	0.3%	0%	0.29%	3.13%
009	59,474	-37	-0.06%	48,273	81.17%	88.93%	1.06%	4.74%	0.83%	0.41%	0.06%	0.33%	3.64%
010	59,519	8	0.01%	47,164	79.24%	81.82%	3.19%	10.04%	1.58%	0.18%	0.03%	0.21%	2.95%
011	58,792	-719	-1.21%	45,396	77.21%	89.31%	1.43%	4.23%	1.06%	0.23%	0.03%	0.27%	3.44%
012	59,300	-211	-0.35%	46,487	78.39%	80.42%	8.94%	6.15%	1.01%	0.18%	0%	0.33%	2.97%
013	59,150	-361	-0.61%	45,176	76.38%	66.3%	18.03%	10.84%	1.36%	0.22%	0.02%	0.26%	2.97%
014	59,135	-376	-0.63%	45,511	76.96%	83.02%	6.05%	5.88%	0.8%	0.25%	0.02%	0.31%	3.65%
015	59,213	-298	-0.50%	45,791	77.33%	71.9%	13.11%	9.67%	1.36%	0.27%	0.03%	0.36%	3.3%
016	59,402	-109	-0.18%	44,009	74.09%	76.42%	10.83%	8.61%	0.79%	0.21%	0.05%	0.32%	2.76%
017	59,120	-391	-0.66%	42,761	72.33%	66.02%	21.24%	6.94%	1.41%	0.25%	0.06%	0.54%	3.55%
018	59,335	-176	-0.30%	45,159	76.11%	86.01%	7.17%	2.39%	0.62%	0.26%	0.04%	0.26%	3.24%
019	59,752	241	0.40%	44,754	74.9%	63.16%	24.22%	6.82%	1.59%	0.19%	0.08%	0.48%	3.46%
020	60,107	596	1.00%	45,725	76.07%	76.4%	7.96%	9.18%	2.03%	0.14%	0.04%	0.55%	3.7%
021	59,529	18	0.03%	44,931	75.48%	82.07%	4.23%	7.44%	1.87%	0.22%	0.05%	0.61%	3.51%
022	59,460	-51	-0.09%	45,815	77.05%	65.61%	13.32%	11.57%	4.04%	0.21%	0.03%	0.76%	4.47%
023	59,048	-463	-0.78%	44,254	74.95%	75.29%	5.48%	14.23%	1.12%	0.21%	0.05%	0.32%	3.3%
024	59,011	-500	-0.84%	41,814	70.86%	63.42%	6.04%	10.32%	16.41%	0.17%	0.05%	0.56%	3.03%
025	59,414	-97	-0.16%	42,520	71.57%	56.12%	5.08%	5.09%	30.56%	0.1%	0.03%	0.45%	2.56%
026	59,248	-263	-0.44%	44,081	74.4%	68.21%	3.18%	10.76%	14.26%	0.12%	0.04%	0.44%	2.99%
027	58,795	-716	-1.20%	46,004	78.24%	82.61%	3.07%	9.6%	0.83%	0.2%	0.04%	0.24%	3.4%
028	58,972	-539	-0.91%	44,444	75.36%	79.36%	3.15%	11.44%	2.16%	0.17%	0.03%	0.36%	3.33%
029	59,200	-311	-0.52%	43,131	72.86%	42.29%	12.55%	39.71%	3.02%	0.14%	0.06%	0.33%	1.91%
030	59,266	-245	-0.41%	45,414	76.63%	70.5%	7.19%	16.13%	2.96%	0.15%	0.02%	0.28%	2.77%
031	59,901	390	0.66%	43,120	71.99%	68.65%	6.79%	18.95%	2.35%	0.21%	0.03%	0.32%	2.69%
032	59,145	-366	-0.62%	45,942	77.68%	82.98%	7.21%	4.87%	1.25%	0.32%	0.05%	0.2%	3.12%
033	59,187	-324	-0.54%	46,498	78.56%	82.25%	10.57%	3.13%	1.16%	0.15%	0.01%	0.29%	2.43%
034	58,947	-564	-0.95%	44,933	76.23%	68.46%	15.79%	7.22%	4.33%	0.1%	0.03%	0.64%	3.43%
035	59,689	178	0.30%	48,436	81.15%	49.35%	28.44%	10.97%	5.74%	0.21%	0.04%	0.95%	4.31%
036	59,898	387	0.65%	45,316	75.66%	69.55%	14.06%	8.39%	3.59%	0.17%	0.05%	0.62%	3.58%
037	58,927	-584	-0.98%	46,057	78.16%	48.11%	22.87%	19.33%	5.39%	0.21%	0.05%	0.81%	3.23%
038	59,317	-194	-0.33%	44,839	75.59%	30.1%	51.13%	12.62%	1.87%	0.24%	0.05%	0.63%	3.36%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
039	59,381	-130	-0.22%	44,436	74.83%	23.47%	52.5%	18.66%	1.77%	0.17%	0.03%	0.6%	2.79%
040	60,184	673	1.13%	45,134	74.99%	62.93%	24.46%	6.74%	1.19%	0.28%	0.04%	0.64%	3.72%
041	60,122	611	1.03%	45,271	75.3%	27.62%	36.96%	28.55%	3.13%	0.22%	0.05%	0.84%	2.62%
042	59,017	-494	-0.83%	46,520	78.82%	42.88%	28.47%	18.3%	5.67%	0.22%	0.03%	0.79%	3.63%
043	59,626	115	0.19%	48,172	80.79%	44.01%	27.45%	11.91%	8.1%	0.22%	0.05%	2.54%	5.72%
044	60,002	491	0.83%	46,773	77.95%	67.69%	10.5%	10.53%	5.78%	0.2%	0.02%	1.06%	4.23%
045	59,738	227	0.38%	44,023	73.69%	74.94%	4.27%	4.85%	12.05%	0.05%	0.02%	0.59%	3.23%
046	59,108	-403	-0.68%	44,132	74.66%	74.81%	6.79%	7.38%	6.72%	0.13%	0.04%	0.61%	3.53%
047	59,126	-385	-0.65%	43,932	74.3%	63.89%	9.3%	7.37%	15.16%	0.17%	0.03%	0.62%	3.46%
048	59,003	-508	-0.85%	44,779	75.89%	61.77%	10.14%	12.41%	11.59%	0.08%	0.04%	0.56%	3.42%
049	59,153	-358	-0.60%	45,263	76.52%	71.48%	7.22%	6.7%	10.74%	0.1%	0.03%	0.63%	3.12%
050	59,523	12	0.02%	43,940	73.82%	44.37%	10.8%	6.36%	34.63%	0.07%	0.05%	0.58%	3.13%
051	58,952	-559	-0.94%	47,262	80.17%	54.33%	21.3%	13.31%	5.93%	0.18%	0.05%	1.01%	3.89%
052	59,811	300	0.50%	48,525	81.13%	55.14%	14.19%	7.41%	19.12%	0.14%	0.07%	0.68%	3.24%
053	59,953	442	0.74%	46,944	78.3%	71.2%	12.71%	7.44%	4.58%	0.09%	0.02%	0.54%	3.41%
054	60,083	572	0.96%	50,338	83.78%	62.98%	13.67%	12.79%	6.86%	0.13%	0.03%	0.53%	3.02%
055	59,115	-396	-0.67%	48,584	82.19%	34.86%	53.88%	4.8%	2.99%	0.19%	0.03%	0.39%	2.87%
056	59,783	272	0.46%	53,358	89.25%	34.24%	46.72%	5.63%	9.05%	0.19%	0.09%	0.43%	3.66%
057	58,961	-550	-0.92%	51,824	87.9%	62.79%	16.07%	7.89%	8.91%	0.08%	0.03%	0.55%	3.68%
058	58,788	-723	-1.21%	50,073	85.18%	32.37%	55.14%	5.51%	3.17%	0.14%	0.01%	0.54%	3.12%
059	59,434	-77	-0.13%	49,179	82.75%	22.04%	66.72%	4.43%	2.9%	0.17%	0.02%	0.54%	3.18%
060	59,560	49	0.08%	46,156	77.49%	37.33%	50.32%	5.82%	3.04%	0.16%	0.07%	0.41%	2.86%
061	59,161	-350	-0.59%	47,510	80.31%	22.22%	53.14%	4.6%	6.17%	0.15%	0.02%	0.62%	3.08%
062	59,450	-61	-0.10%	46,426	78.09%	19.07%	69.19%	6.83%	1.3%	0.21%	0.05%	0.47%	2.88%
063	59,381	-130	-0.22%	45,043	75.85%	19.22%	66.7%	9.26%	1.54%	0.21%	0.04%	0.47%	2.56%
064	59,608	97	0.16%	44,900	75.33%	36.54%	49.55%	7.88%	1.93%	0.18%	0.04%	0.63%	3.24%
065	59,129	-382	-0.64%	44,495	75.25%	24.25%	68.34%	3.19%	0.77%	0.16%	0.03%	0.49%	2.77%
066	60,306	795	1.34%	45,228	75%	31.2%	51.39%	11.86%	1.45%	0.29%	0.1%	0.56%	3.15%
067	59,135	-376	-0.63%	44,299	74.91%	30.86%	56.59%	7.75%	1.39%	0.19%	0.03%	0.49%	2.7%
068	59,477	-34	-0.06%	44,835	75.38%	33.94%	53.42%	6.33%	2.77%	0.14%	0.05%	0.63%	2.72%
069	58,682	-829	-1.39%	45,540	77.62%	26.89%	60.9%	5.42%	3.12%	0.18%	0.04%	0.78%	2.68%
070	59,121	-390	-0.66%	45,249	76.54%	59.69%	26.23%	7.96%	2.23%	0.22%	0.06%	0.4%	3.22%
071	59,538	27	0.05%	44,582	74.88%	69.8%	18.45%	6.18%	1.01%	0.24%	0.02%	0.42%	3.88%
072	59,660	149	0.25%	46,229	77.49%	69.24%	19.51%	6.94%	0.93%	0.19%	0.02%	0.23%	2.94%
073	60,036	525	0.88%	45,736	76.18%	72.58%	10.84%	7.05%	5.58%	0.14%	0.03%	0.4%	3.38%
074	59,120	-391	-0.66%	44,044	74.5%	23.69%	62.81%	7.84%	2%	0.19%	0.02%	0.62%	2.83%
075	59,743	232	0.39%	43,850	73.4%	11.27%	71.04%	11.28%	2.93%	0.18%	0.07%	0.66%	2.57%
076	59,759	248	0.42%	44,371	74.25%	10.51%	64.4%	13.23%	8.69%	0.21%	0.05%	0.51%	2.41%
077	59,242	-269	-0.45%	44,207	74.62%	7.58%	73.27%	12.2%	4.36%	0.23%	0.06%	0.41%	1.9%
078	59,734	223	0.37%	45,718	76.54%	24.39%	56.04%	9.25%	6.65%	0.22%	0.05%	0.63%	2.78%
079	59,500	-11	-0.02%	43,223	72.64%	7.15%	68.44%	16.03%	5.51%	0.2%	0.01%	0.56%	2.09%
080	59,461	-50	-0.08%	44,784	75.32%	47.63%	12.45%	23.12%	13.33%	0.07%	0.04%	0.56%	2.79%
081	58,919	-592	-0.99%	43,235	73.38%	65.85%	23.62%	4.81%	1.63%	0.19%	0.02%	0.44%	3.43%

Population Summary

House-2023

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
082	59,789	278	0.47%	46,252	77.36%	65.28%	24.3%	4.88%	1.86%	0.24%	0.02%	0.38%	3.04%
083	59,416	-95	-0.16%	46,581	78.4%	47.9%	13.51%	28.47%	6.91%	0.1%	0.02%	0.55%	2.55%
084	58,801	-710	-1.19%	46,355	78.83%	34.7%	53.33%	4.11%	3.79%	0.16%	0.03%	0.53%	3.36%
085	59,591	80	0.13%	46,239	77.59%	27.96%	49.14%	6.34%	12.44%	0.23%	0.02%	0.58%	3.3%
086	59,153	-358	-0.60%	45,107	76.25%	29.04%	52.17%	4.95%	9.96%	0.13%	0.02%	0.69%	3.05%
087	59,684	173	0.29%	46,046	77.15%	27.17%	51.12%	9.58%	8.34%	0.21%	0.02%	0.58%	2.98%
088	59,689	178	0.30%	46,073	77.19%	18.3%	60.15%	9.97%	7.64%	0.22%	0.07%	0.64%	3.01%
089	60,231	720	1.21%	48,361	80.29%	33.49%	54.66%	3.53%	4.52%	0.16%	0.04%	0.43%	3.17%
090	59,856	345	0.58%	48,477	80.99%	40.37%	48.88%	4.6%	2.33%	0.1%	0.03%	0.5%	3.19%
091	59,976	465	0.78%	46,174	76.99%	19.71%	71.99%	3.58%	1.02%	0.12%	0.02%	0.56%	3%
092	60,150	639	1.07%	45,550	75.73%	22.75%	64.96%	6.81%	1.82%	0.19%	0.1%	0.46%	2.9%
093	60,290	779	1.31%	45,092	74.79%	21.7%	61.57%	10.8%	2.09%	0.16%	0.02%	0.71%	2.96%
094	60,192	681	1.14%	45,155	75.02%	24.61%	54.61%	7.57%	9.41%	0.15%	0.01%	0.58%	3.06%
095	58,992	-519	-0.87%	43,421	73.6%	19.24%	62.89%	6.92%	3.73%	0.2%	0.04%	0.65%	3.33%
096	59,515	4	0.01%	44,671	75.06%	20.32%	20.75%	36.03%	19.7%	0.11%	0.04%	0.6%	2.44%
097	59,072	-439	-0.74%	46,339	78.44%	36.44%	24.16%	19.23%	16.07%	0.19%	0.05%	0.6%	3.25%
098	59,998	487	0.82%	42,734	71.23%	11.66%	20.91%	52.77%	12.28%	0.12%	0.05%	0.51%	1.71%
099	59,850	339	0.57%	45,004	75.19%	42.1%	13.07%	8.67%	32.63%	0.13%	0.04%	0.48%	2.89%
100	60,030	519	0.87%	42,669	71.08%	59.05%	2.86%	9.98%	18.41%	0.19%	0.06%	0.43%	3.02%
101	59,240	-271	-0.46%	47,353	79.93%	48.51%	18.97%	19.68%	8.93%	0.17%	0.02%	0.55%	3.17%
102	60,038	527	0.89%	44,409	73.97%	30.36%	37.41%	21.19%	7.41%	0.14%	0.04%	0.57%	2.88%
103	60,197	686	1.15%	44,399	73.76%	52.42%	15.01%	16.89%	12.19%	0.12%	0.03%	0.5%	2.83%
104	59,362	-149	-0.25%	43,306	72.95%	52.95%	15.44%	11.14%	6.38%	0.18%	0.05%	0.51%	3.34%
105	59,395	-116	-0.19%	43,980	74.05%	46.43%	21.38%	15.54%	12.96%	0.11%	0.01%	0.48%	3.09%
106	59,981	470	0.79%	44,518	74.22%	30.02%	24.78%	25.03%	17.13%	0.17%	0.05%	0.47%	2.34%
107	60,033	522	0.88%	46,162	76.89%	33.37%	22.36%	21.49%	19.1%	0.19%	0.06%	0.57%	2.87%
108	58,942	-569	-0.96%	44,123	74.86%	45.89%	15.57%	17.67%	17.37%	0.19%	0.03%	0.52%	2.76%
109	59,697	186	0.31%	44,206	74.05%	13.9%	29.9%	38.91%	14.15%	0.14%	0.03%	0.58%	2.38%
110	60,278	767	1.29%	43,324	71.87%	38.06%	40.83%	11.61%	5.08%	0.18%	0.04%	0.75%	3.45%
111	59,900	389	0.65%	43,967	73.4%	62.71%	21.95%	8.77%	2.57%	0.2%	0.04%	0.56%	3.2%
112	60,167	656	1.10%	45,440	75.53%	67.09%	22.9%	4.82%	1.51%	0.23%	0.04%	0.58%	2.83%
113	59,413	-98	-0.16%	44,248	74.48%	30%	58.32%	6.3%	1.06%	0.2%	0.12%	0.73%	3.27%
114	59,401	-110	-0.18%	45,971	77.39%	69.54%	23.15%	3.32%	0.83%	0.16%	0%	0.33%	2.66%
115	59,381	-130	-0.22%	46,468	78.25%	17.95%	72.19%	4.04%	1.81%	0.17%	0.01%	0.79%	3.04%
116	59,777	266	0.45%	45,550	76.2%	17.77%	70.91%	4.98%	2.87%	0.2%	0.07%	0.49%	2.71%
117	59,533	22	0.04%	43,634	73.29%	26.63%	59.48%	7.76%	2.09%	0.16%	0.08%	0.65%	3.14%
118	59,901	390	0.66%	46,298	77.29%	64.34%	28%	3.5%	0.52%	0.16%	0.04%	0.47%	2.97%
119	58,947	-564	-0.95%	44,005	74.65%	69.8%	12.31%	10.44%	3.75%	0.17%	0.02%	0.43%	3.08%
120	58,982	-529	-0.89%	46,767	79.29%	71.94%	13.21%	7.09%	4.18%	0.16%	0.05%	0.44%	2.91%
121	59,127	-384	-0.65%	46,598	78.81%	76.13%	8.6%	5.57%	5.84%	0.1%	0%	0.46%	3.3%
122	59,632	121	0.20%	48,840	81.9%	54.8%	27.13%	11.7%	2.41%	0.32%	0.06%	0.79%	2.79%
123	59,282	-229	-0.38%	46,572	78.56%	68.06%	23.42%	4.31%	1.06%	0.19%	0.02%	0.2%	2.75%
124	59,221	-290	-0.49%	47,638	80.44%	65.01%	24.61%	6.17%	1.08%	0.19%	0.02%	0.31%	2.61%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
125	60,137	626	1.05%	43,812	72.85%	63.03%	21.43%	7.66%	2.6%	0.31%	0.16%	0.39%	4.41%
126	59,260	-251	-0.42%	45,497	76.78%	39.97%	52.63%	3.17%	0.89%	0.29%	0.16%	0.29%	2.62%
127	58,678	-833	-1.40%	45,889	78.2%	68.13%	16.88%	4.77%	5.68%	0.19%	0.16%	0.43%	3.77%
128	58,864	-647	-1.09%	46,488	78.98%	46.49%	49.38%	1.7%	0.35%	0.19%	0.01%	0.17%	1.71%
129	58,829	-682	-1.15%	46,873	79.68%	37.16%	52.33%	4.26%	2.4%	0.19%	0.15%	0.41%	3.1%
130	59,203	-308	-0.52%	44,019	74.35%	33.74%	57.69%	3.86%	0.97%	0.26%	0.19%	0.34%	2.95%
131	58,890	-621	-1.04%	42,968	72.96%	68.16%	15.87%	5.87%	5.21%	0.21%	0.1%	0.55%	4.03%
132	59,142	-369	-0.62%	46,752	79.05%	35.63%	49.82%	7.8%	2.74%	0.27%	0.16%	0.3%	3.28%
133	58,893	-618	-1.04%	46,821	79.5%	60.99%	30.75%	5.69%	0.57%	0.19%	0.04%	0.14%	1.63%
134	59,575	64	0.11%	47,005	78.9%	66.82%	26.71%	2.61%	0.64%	0.26%	0.01%	0.25%	2.69%
135	59,870	359	0.60%	45,706	76.34%	71.1%	22.27%	2.71%	0.72%	0.18%	0.02%	0.28%	2.73%
136	59,298	-213	-0.36%	45,367	76.51%	63.9%	27.76%	3.64%	1.55%	0.26%	0.04%	0.29%	2.55%
137	59,551	40	0.07%	45,358	76.17%	40.82%	50.02%	4.48%	1.73%	0.12%	0.12%	0.26%	2.44%
138	58,912	-599	-1.01%	45,684	77.55%	72.34%	18.26%	5.31%	2.43%	0.26%	0.07%	0.35%	2.97%
139	59,010	-501	-0.84%	45,522	77.14%	66.19%	18.56%	6.36%	3.89%	0.25%	0.24%	0.46%	4.04%
140	59,294	-217	-0.36%	44,411	74.9%	31.7%	54.74%	8.02%	1.17%	0.24%	0.2%	0.49%	3.43%
141	59,019	-492	-0.83%	44,677	75.7%	31.77%	54.65%	6.55%	2.69%	0.27%	0.3%	0.38%	3.38%
142	59,312	-199	-0.33%	45,355	76.47%	42.49%	49.15%	3.27%	1.96%	0.17%	0.04%	0.31%	2.58%
143	59,432	-79	-0.13%	45,411	76.41%	39.97%	42.04%	7.06%	1.21%	0.24%	0.05%	0.29%	3.14%
144	59,307	-204	-0.34%	46,029	77.61%	71.86%	20.19%	3.3%	1.78%	0.2%	0.01%	0.23%	2.42%
145	58,805	-706	-1.19%	45,090	76.68%	42.51%	49.08%	4.1%	1.85%	0.17%	0.01%	0.34%	1.94%
146	60,203	692	1.16%	44,589	74.06%	61.84%	26.08%	4.73%	2.98%	0.18%	0.09%	0.39%	3.71%
147	60,375	864	1.45%	46,125	76.4%	56.94%	27.25%	6.83%	4.77%	0.25%	0.07%	0.41%	3.49%
148	59,984	473	0.79%	46,614	77.71%	60.45%	33.11%	3.08%	0.87%	0.14%	0.04%	0.21%	2.1%
149	59,715	204	0.34%	47,261	79.14%	45.49%	48.75%	2.13%	1.1%	0.16%	0.04%	0.35%	1.97%
150	59,276	-235	-0.39%	47,050	79.37%	38.31%	52.5%	6.13%	1.18%	0.16%	0.03%	0.15%	1.54%
151	60,059	548	0.92%	46,973	78.21%	47.2%	40.96%	7.28%	1.43%	0.18%	0.18%	0.19%	2.58%
152	60,134	623	1.05%	46,026	76.54%	67.94%	25.26%	2.34%	1.52%	0.24%	0.04%	0.19%	2.46%
153	59,299	-212	-0.36%	45,692	77.05%	27.66%	66.38%	2.55%	1%	0.16%	0.03%	0.23%	2.01%
154	59,994	483	0.81%	47,273	78.8%	42.24%	53.68%	1.67%	0.36%	0.19%	0%	0.16%	1.7%
155	58,759	-752	-1.26%	45,206	76.94%	59.77%	34.6%	2.22%	0.95%	0.16%	0.04%	0.21%	2.05%
156	59,444	-67	-0.11%	45,867	77.16%	60.92%	29.32%	6.88%	0.62%	0.16%	0.01%	0.15%	1.93%
157	59,957	446	0.75%	45,311	75.57%	64.48%	23.7%	8.96%	0.57%	0.17%	0.04%	0.16%	1.93%
158	59,440	-71	-0.12%	45,549	76.63%	62.21%	30.2%	4.52%	0.71%	0.21%	0.03%	0.18%	1.93%
159	59,895	384	0.65%	44,871	74.92%	69.39%	23.44%	2.87%	0.57%	0.31%	0.04%	0.26%	3.12%
160	59,935	424	0.71%	48,057	80.18%	68.48%	21.07%	5.04%	1.64%	0.24%	0.09%	0.27%	3.17%
161	60,097	586	0.98%	44,371	73.83%	60.16%	25.26%	6.82%	3.16%	0.25%	0.09%	0.48%	3.77%
162	60,308	797	1.34%	46,733	77.49%	40.62%	41.13%	9.58%	4.16%	0.22%	0.24%	0.44%	3.61%
163	60,123	612	1.03%	48,461	80.6%	41.92%	43.78%	7.38%	3.6%	0.2%	0.1%	0.33%	2.68%
164	60,101	590	0.99%	45,851	76.29%	60.61%	21.43%	8.49%	4.37%	0.26%	0.12%	0.6%	4.12%
165	59,978	467	0.78%	48,247	80.44%	39.18%	48.49%	5.33%	3.68%	0.25%	0.14%	0.35%	2.57%
166	60,242	731	1.23%	47,580	78.98%	84.71%	4.96%	4.07%	2.69%	0.18%	0.05%	0.36%	2.97%
167	59,493	-18	-0.03%	44,140	74.19%	65.96%	20.55%	7.41%	1.48%	0.39%	0.18%	0.39%	3.66%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
168	60,147	636	1.07%	44,867	74.6%	39.29%	42.28%	10.3%	2.32%	0.33%	0.65%	0.38%	4.46%
169	59,138	-373	-0.63%	45,267	76.54%	60.95%	28.12%	7.66%	0.88%	0.14%	0.03%	0.16%	2.06%
170	60,116	605	1.02%	45,316	75.38%	64.17%	23.21%	8.65%	1.19%	0.12%	0.02%	0.25%	2.38%
171	59,237	-274	-0.46%	45,969	77.6%	53.85%	38.58%	4.63%	0.56%	0.24%	0.02%	0.17%	1.95%
172	59,961	450	0.76%	44,756	74.64%	61.03%	22.46%	13.42%	0.78%	0.23%	0.03%	0.19%	1.87%
173	59,743	232	0.39%	45,292	75.81%	55.68%	35.18%	5.35%	0.84%	0.37%	0.02%	0.26%	2.31%
174	59,852	341	0.57%	45,760	76.46%	72.25%	16.08%	7.96%	0.52%	0.38%	0.03%	0.15%	2.64%
175	59,993	482	0.81%	44,704	74.52%	66.49%	23.13%	5.03%	1.85%	0.28%	0.06%	0.3%	2.86%
176	59,470	-41	-0.07%	44,991	75.65%	66.15%	21.61%	8.24%	0.96%	0.25%	0.1%	0.19%	2.49%
177	59,992	481	0.81%	46,014	76.7%	37.12%	51.68%	6.12%	1.36%	0.24%	0.08%	0.36%	3.04%
178	59,877	366	0.62%	45,638	76.22%	77.79%	13.99%	5.14%	0.54%	0.2%	0.01%	0.23%	2.09%
179	59,356	-155	-0.26%	47,156	79.45%	63.69%	25.74%	6.38%	1.07%	0.15%	0.11%	0.34%	2.51%
180	59,412	-99	-0.17%	45,362	76.35%	71.17%	16.63%	5.62%	1.67%	0.31%	0.11%	0.47%	4.02%

Total: 10,711,908**Ideal District: 59,511****Summary Statistics:**

Population Range: 58,678 to 60,375
Ratio Range: 0.03
Absolute Range: -833 to 864
Absolute Overall Range: 1,697
Relative Range: -1.40% to 1.45%
Relative Overall Range: 2.85%
Absolute Mean Deviation: 372.39
Relative Mean Deviation: 0.63%
Standard Deviation: 433.63

EXHIBIT 4

RETRIEVED FROM DEMOCRACYDOCKET.COM

User: H123

Plan Name: House-2023

Plan Type: House

Population Summary

*Census designation "AP" denotes respondents who are Any or Part of a race category; respondents may fall into more than one category.

District	Population	Deviation	% Devn.	[% 18+_Pop]	[% 18+_AP_Wht]	[% 18+_AP_Blkl]	[% H18+_Pop]	[% 18+_AP_Ind]	[% 18+_AP_Asn]	[% 18+_AP_Hwn]	[% 18+_AP_Oth]	[% 18+_2+_Races]
001	59,666	155	0.26%	78.44%	94.22%	4.2%	2.11%	3.02%	0.76%	0.09%	2.14%	4.3%
002	59,773	262	0.44%	77.22%	92.38%	3.15%	7.57%	2.59%	1.31%	0.05%	6.13%	5.5%
003	60,199	688	1.16%	77.6%	93.81%	3.35%	2.96%	2.93%	1.84%	0.2%	2.7%	4.72%
004	59,070	-441	-0.74%	72.45%	67.92%	5.38%	44.13%	4.5%	1.51%	0.1%	34.2%	13.19%
005	58,837	-674	-1.13%	75.84%	87.41%	4.6%	12.62%	3.01%	1.48%	0.09%	10.48%	6.79%
006	59,712	201	0.34%	75.62%	91.41%	1.51%	11.96%	3.45%	0.73%	0.06%	9.23%	6.16%
007	59,081	-430	-0.72%	82.55%	95.49%	0.62%	5.53%	2.88%	0.67%	0.04%	4.95%	4.51%
008	59,244	-267	-0.45%	83.74%	96.78%	1.43%	2.74%	2.62%	0.77%	0.06%	2.73%	4.24%
009	59,474	-37	-0.06%	81.17%	95.52%	1.57%	4.74%	3%	1.29%	0.15%	4.22%	5.51%
010	59,519	8	0.01%	79.24%	90.2%	3.73%	10.04%	2.6%	1.84%	0.12%	8.09%	6.27%
011	58,792	-719	-1.21%	77.21%	95.24%	1.85%	4.23%	2.68%	1.38%	0.09%	4.15%	5.25%
012	59,300	-211	-0.35%	78.39%	85.66%	9.68%	6.15%	2.44%	1.25%	0.06%	5.57%	4.44%
013	59,150	-361	-0.61%	76.38%	74.05%	19.18%	10.84%	2.45%	1.66%	0.09%	9.36%	6.59%
014	59,135	-376	-0.63%	76.96%	89.71%	6.85%	5.83%	2.98%	1.1%	0.07%	5.06%	5.47%
015	59,213	-298	-0.50%	77.33%	79.28%	14.19%	9.67%	2.79%	1.69%	0.14%	8.29%	6.07%
016	59,402	-109	-0.18%	74.09%	82.46%	11.69%	8.61%	2.34%	1.03%	0.13%	7.23%	4.68%
017	59,120	-391	-0.66%	72.33%	73.09%	23.02%	6.94%	2.22%	1.94%	0.16%	6.22%	6.29%
018	59,335	-176	-0.30%	76.11%	90.5%	7.98%	2.39%	2.48%	0.88%	0.08%	2.38%	4.05%
019	59,752	241	0.40%	74.9%	69.82%	25.06%	6.82%	2.27%	2.22%	0.15%	5.9%	5.98%
020	60,107	596	1.00%	76.07%	85.48%	9.25%	9.18%	2.23%	2.79%	0.13%	8.38%	7.86%
021	59,529	18	0.03%	75.48%	90.45%	5.06%	7.44%	2.38%	2.49%	0.13%	6.85%	7.08%
022	59,460	-51	-0.09%	77.05%	76.47%	15.1%	11.57%	2.61%	4.92%	0.17%	10.6%	9.39%
023	59,048	-463	-0.78%	74.95%	85.52%	6.5%	14.23%	2.96%	1.7%	0.14%	11.25%	7.75%
024	59,011	-500	-0.84%	70.86%	72.04%	7%	10.32%	1.61%	17.23%	0.1%	9.94%	7.61%
025	59,414	-97	-0.16%	71.57%	62.41%	5.9%	5.09%	0.8%	31.41%	0.12%	5.16%	5.5%
026	59,248	-263	-0.44%	74.4%	76.8%	4.01%	10.76%	1.86%	14.93%	0.09%	9.96%	7.35%
027	58,795	-716	-1.20%	78.24%	90.72%	3.69%	9.6%	2.81%	1.21%	0.08%	8.22%	6.51%
028	58,972	-539	-0.91%	75.36%	88.61%	3.93%	11.44%	2.46%	2.71%	0.11%	10.06%	7.54%
029	59,200	-311	-0.52%	72.86%	60.33%	13.59%	39.71%	2.65%	3.4%	0.1%	32.56%	12.31%
030	59,266	-245	-0.41%	76.63%	81.09%	8.1%	16.13%	2.18%	3.42%	0.07%	13.76%	8.32%
031	59,901	390	0.66%	71.99%	79.7%	7.57%	18.95%	2.69%	2.78%	0.12%	15.7%	8.35%
032	59,145	-366	-0.62%	77.68%	88.28%	7.96%	4.87%	2.61%	1.51%	0.12%	4.26%	4.48%
033	59,187	-324	-0.54%	78.56%	86.06%	11.2%	3.13%	1.81%	1.4%	0.07%	3.04%	3.36%
034	58,947	-564	-0.95%	76.23%	75.72%	17.31%	7.22%	1.83%	5.12%	0.09%	7.01%	6.65%
035	59,689	178	0.30%	81.15%	58.96%	31.54%	10.97%	2%	6.75%	0.15%	9.95%	8.67%
036	59,898	387	0.65%	75.66%	77.67%	15.71%	8.39%	2.08%	4.36%	0.18%	7.89%	7.38%
037	58,927	-584	-0.98%	78.16%	59.16%	24.92%	19.33%	2.46%	6.02%	0.19%	16.44%	8.75%
038	59,317	-194	-0.33%	75.59%	37.52%	54.23%	12.62%	2.14%	2.4%	0.17%	11.15%	7.12%

Population Summary

House-2023

District	Population	Deviation	% Devn.	[% 18+_Pop]	[% 18+_AP_Wht]	[% 18+_AP_Blkl]	[% H18+_Pop]	[% 18+_AP_Ind]	[% 18+_AP_Asn]	[% 18+_AP_Hwn]	[% 18+_AP_Oth]	[% 18+_2+_Races]
039	59,381	-130	-0.22%	74.83%	31.85%	55.29%	18.66%	2.05%	2.28%	0.12%	16.75%	7.87%
040	60,184	673	1.13%	74.99%	69.68%	26.41%	6.74%	2.4%	1.64%	0.12%	6.34%	6.27%
041	60,122	611	1.03%	75.3%	42.58%	39.35%	28.55%	2.53%	3.67%	0.14%	23.53%	11.19%
042	59,017	-494	-0.83%	78.82%	54.56%	31.03%	18.3%	2.04%	6.47%	0.13%	15.84%	9.59%
043	59,626	115	0.19%	80.79%	54.71%	30.25%	11.91%	2%	8.99%	0.1%	14.62%	10.13%
044	60,002	491	0.83%	77.95%	77.79%	12.05%	10.53%	2.11%	6.75%	0.13%	10.47%	8.8%
045	59,738	227	0.38%	73.69%	81.68%	5.28%	4.85%	1.22%	12.98%	0.08%	5.2%	6.09%
046	59,108	-403	-0.68%	74.66%	83.08%	8.07%	7.38%	1.52%	7.77%	0.14%	7.2%	7.38%
047	59,126	-385	-0.65%	74.3%	71.89%	10.72%	7.37%	1.66%	16.07%	0.14%	7.25%	7.16%
048	59,003	-508	-0.85%	75.89%	71.45%	11.79%	12.41%	1.55%	12.59%	0.16%	11.71%	8.8%
049	59,153	-358	-0.60%	76.52%	79.05%	8.42%	6.7%	1.27%	11.65%	0.1%	6.59%	6.7%
050	59,523	12	0.02%	73.82%	51.11%	12.4%	6.36%	0.93%	35.8%	0.16%	6.46%	6.36%
051	58,952	-559	-0.94%	80.17%	64.38%	23.68%	13.31%	1.84%	6.89%	0.16%	12.8%	9.16%
052	59,811	300	0.50%	81.13%	62.49%	15.99%	7.41%	1.23%	20.06%	0.21%	7.21%	6.76%
053	59,953	442	0.74%	78.3%	78.71%	14.53%	7.44%	1.39%	5.45%	0.13%	7.31%	6.97%
054	60,083	572	0.96%	83.78%	71.84%	15.47%	12.79%	1.29%	7.86%	0.11%	11.71%	7.84%
055	59,115	-396	-0.67%	82.19%	39.47%	56.39%	4.8%	1.33%	3.72%	0.17%	3.94%	4.52%
056	59,783	272	0.46%	89.25%	40.34%	49.38%	5.63%	1.24%	10.47%	0.21%	4.53%	5.68%
057	58,961	-550	-0.92%	87.9%	70.57%	17.98%	7.89%	1.36%	10.28%	0.14%	7.17%	7%
058	58,788	-723	-1.21%	85.18%	37.82%	57.67%	5.51%	1.25%	3.98%	0.1%	4.22%	4.62%
059	59,434	-77	-0.13%	82.75%	26.52%	70.09%	4.43%	1.32%	3.64%	0.15%	3.61%	4.84%
060	59,560	49	0.08%	77.49%	41.98%	52.93%	5.82%	1.32%	3.72%	0.17%	5.34%	4.95%
061	59,161	-350	-0.59%	80.31%	36.87%	55.91%	4.6%	1.32%	6.96%	0.1%	4.44%	5.08%
062	59,450	-61	-0.10%	78.09%	23.61%	72.26%	6.83%	1.46%	1.88%	0.13%	5.99%	4.85%
063	59,381	-130	-0.22%	75.85%	24.72%	69.33%	9.26%	1.65%	2.02%	0.12%	7.54%	4.84%
064	59,608	97	0.16%	75.33%	42.19%	52.43%	7.88%	1.95%	2.34%	0.12%	7.03%	5.65%
065	59,129	-382	-0.64%	75.25%	27.23%	71.27%	3.19%	1.44%	1.15%	0.07%	3.23%	3.98%
066	60,306	795	1.34%	75%	37.99%	54.28%	11.86%	2.19%	1.85%	0.24%	10.37%	6.43%
067	59,135	-376	-0.63%	74.91%	35.99%	58.92%	7.75%	1.54%	1.88%	0.1%	7.01%	5.01%
068	59,477	-34	-0.06%	75.38%	38.68%	55.75%	6.33%	1.51%	3.31%	0.13%	6.01%	5.02%
069	58,682	-829	-1.39%	77.62%	31.02%	63.56%	5.42%	1.47%	3.6%	0.09%	5.2%	4.55%
070	59,121	-390	-0.66%	76.54%	66.16%	27.83%	7.96%	2.26%	2.74%	0.13%	6.92%	5.68%
071	59,538	27	0.05%	74.88%	76.44%	19.92%	6.18%	2.71%	1.44%	0.13%	5.63%	5.91%
072	59,660	149	0.25%	77.49%	74.61%	20.86%	6.94%	2.03%	1.18%	0.09%	5.93%	4.49%
073	60,036	525	0.88%	76.18%	80.24%	12.11%	7.05%	1.94%	6.46%	0.11%	6.33%	6.86%
074	59,120	-391	-0.66%	74.5%	28.39%	66%	7.84%	1.82%	2.52%	0.14%	6.68%	5.08%
075	59,743	232	0.39%	73.4%	15.97%	74.4%	11.28%	1.66%	3.38%	0.14%	10%	5.11%
076	59,759	248	0.42%	74.25%	15.83%	67.23%	13.23%	2.04%	9.11%	0.15%	11.6%	5.53%
077	59,242	-269	-0.45%	74.62%	11.69%	76.13%	12.2%	1.59%	4.55%	0.12%	10.5%	4.21%
078	59,734	223	0.37%	76.54%	29.38%	58.99%	9.25%	1.68%	7.17%	0.18%	8.52%	5.42%
079	59,500	-11	-0.02%	72.64%	12.44%	71.59%	16.03%	1.85%	5.89%	0.12%	13.8%	5.27%
080	59,461	-50	-0.08%	75.32%	57.91%	14.18%	23.12%	2.69%	14.23%	0.14%	20.3%	8.91%
081	58,919	-592	-0.99%	73.38%	71.43%	25.18%	4.81%	2.13%	2.22%	0.12%	4.58%	5.28%

Population Summary

House-2023

District	Population	Deviation	% Devn.	[% 18+_Pop]	[% 18+_AP_Wht]	[% 18+_AP_Blkl]	[% H18+_Pop]	[% 18+_AP_Ind]	[% 18+_AP_Asn]	[% 18+_AP_Hwn]	[% 18+_AP_Oth]	[% 18+_2+_Races]
082	59,789	278	0.47%	77.36%	70.88%	25.46%	4.88%	2.14%	2.29%	0.08%	4.43%	5.02%
083	59,416	-95	-0.16%	78.4%	59.34%	15.12%	28.47%	2.72%	7.79%	0.09%	24.84%	9.46%
084	58,801	-710	-1.19%	78.83%	39.19%	56.06%	4.11%	1.52%	4.52%	0.13%	4.1%	4.97%
085	59,591	80	0.13%	77.59%	33.49%	51.92%	6.34%	1.44%	13.48%	0.15%	4.98%	5.01%
086	59,153	-358	-0.60%	76.25%	33.43%	54.63%	4.95%	1.28%	10.87%	0.11%	5%	4.83%
087	59,684	173	0.29%	77.15%	32.48%	53.86%	9.58%	1.75%	9.01%	0.12%	8.98%	5.81%
088	59,689	178	0.30%	77.19%	23.47%	63.35%	9.97%	1.78%	8.28%	0.18%	9.37%	5.91%
089	60,231	720	1.21%	80.29%	37.82%	57.09%	3.53%	1.23%	5.44%	0.12%	3.27%	4.52%
090	59,856	345	0.58%	80.99%	45.64%	51.11%	4.6%	1.16%	3.29%	0.17%	4.19%	5.1%
091	59,976	465	0.78%	76.99%	22.69%	75.04%	3.58%	1.46%	1.39%	0.11%	3.96%	4.26%
092	60,150	639	1.07%	75.73%	26.91%	68.11%	6.81%	1.42%	2.14%	0.22%	6.59%	5.04%
093	60,290	779	1.31%	74.79%	27.44%	64.87%	10.8%	1.58%	2.64%	0.11%	9.92%	6.08%
094	60,192	681	1.14%	75.02%	29.54%	57.53%	7.57%	1.68%	10.06%	0.1%	7.2%	5.63%
095	58,992	-519	-0.87%	73.6%	25.08%	66.74%	9.92%	1.77%	4.34%	0.19%	9.2%	6.75%
096	59,515	4	0.01%	75.06%	33.9%	23%	36.03%	2.54%	20.53%	0.19%	31.68%	11.26%
097	59,072	-439	-0.74%	78.44%	47.06%	26.77%	19.23%	1.88%	17.2%	0.18%	17.08%	9.67%
098	59,998	487	0.82%	71.23%	28.91%	23.25%	52.77%	3.49%	12.9%	0.2%	45.7%	13.77%
099	59,850	339	0.57%	75.19%	49.54%	14.71%	8.67%	1.26%	33.72%	0.18%	7.8%	6.77%
100	60,030	519	0.87%	71.08%	67.78%	10.01%	3.98%	1.77%	19.32%	0.13%	8.95%	7.59%
101	59,240	-271	-0.46%	79.93%	58.55%	21.15%	19.68%	2.27%	10.02%	0.11%	17.34%	8.91%
102	60,038	527	0.89%	73.97%	41.82%	40.31%	21.19%	1.97%	8.19%	0.14%	18.43%	10.23%
103	60,197	686	1.15%	73.76%	63.32%	16.74%	16.89%	1.93%	12.99%	0.13%	14.5%	9.13%
104	59,362	-149	-0.25%	72.95%	71.77%	17.03%	11.14%	2.12%	7.19%	0.19%	9.63%	7.53%
105	59,395	-116	-0.19%	74.05%	57.29%	23.53%	15.54%	1.9%	13.87%	0.13%	13.24%	9.45%
106	59,981	470	0.79%	74.22%	42.16%	26.95%	25.03%	2.35%	17.92%	0.14%	21.5%	10.46%
107	60,033	522	0.88%	76.89%	45.79%	24.68%	21.49%	2.17%	20.1%	0.18%	18.41%	10.81%
108	58,942	-569	-0.96%	74.86%	55.6%	17.28%	17.67%	2.19%	18.26%	0.13%	15.47%	8.44%
109	59,697	186	0.31%	74.05%	29.67%	32.96%	38.91%	2.46%	15.05%	0.16%	33.85%	13.57%
110	60,278	767	1.29%	71.87%	46.34%	43.99%	11.61%	1.99%	5.88%	0.14%	10.47%	8.18%
111	59,900	389	0.65%	73.4%	69.69%	23.76%	8.77%	2.12%	3.2%	0.15%	7.99%	6.51%
112	60,167	656	1.10%	75.53%	71.97%	24.27%	4.82%	1.98%	1.86%	0.11%	4.53%	4.5%
113	59,413	-98	-0.16%	74.48%	34.66%	61.3%	6.3%	1.62%	1.49%	0.21%	6.17%	5.13%
114	59,401	-110	-0.18%	77.39%	73.61%	24.32%	3.32%	2%	1.08%	0.08%	3.07%	3.84%
115	59,381	-130	-0.22%	78.25%	21.27%	75.45%	4.04%	1.46%	2.27%	0.06%	4.48%	4.53%
116	59,777	266	0.45%	76.2%	21.3%	73.91%	4.98%	1.48%	3.28%	0.15%	4.67%	4.33%
117	59,533	22	0.04%	73.29%	32.11%	62.93%	7.76%	1.62%	2.6%	0.18%	6.81%	5.83%
118	59,901	390	0.66%	77.29%	68.76%	29.41%	3.5%	2.04%	0.74%	0.13%	3.44%	4.21%
119	58,947	-564	-0.95%	74.65%	77.8%	13.49%	10.44%	2.33%	4.21%	0.11%	8.87%	6.53%
120	58,982	-529	-0.89%	79.29%	78.44%	14.28%	7.09%	1.72%	4.79%	0.15%	6.12%	5.25%
121	59,127	-384	-0.65%	78.81%	82.76%	9.56%	5.57%	1.71%	6.7%	0.06%	4.91%	5.43%
122	59,632	121	0.20%	81.9%	61.99%	28.42%	11.7%	1.58%	3.44%	0.17%	10.48%	5.82%
123	59,282	-229	-0.38%	78.56%	72.64%	24.28%	4.31%	1.99%	1.41%	0.13%	3.92%	4%
124	59,221	-290	-0.49%	80.44%	70.43%	25.58%	6.17%	1.69%	1.5%	0.15%	5.72%	4.76%

Population Summary

District	Population	Deviation	% Devn.	[% 18+_Pop]	[% 18+_AP_Wht]	[% 18+_AP_Blkl]	[% H18+_Pop]	[% 18+_AP_Ind]	[% 18+_AP_Asn]	[% 18+_AP_Hwn]	[% 18+_AP_Oth]	[% 18+_2+_Races]
125	60,137	626	1.05%	72.85%	71.14%	23.68%	7.66%	2.61%	3.94%	0.39%	6.17%	7.27%
126	59,260	-251	-0.42%	76.78%	43.53%	54.47%	3.17%	1.61%	1.29%	0.28%	2.66%	3.53%
127	58,678	-833	-1.40%	78.2%	74.43%	18.52%	4.77%	2%	6.66%	0.27%	4.19%	5.67%
128	58,864	-647	-1.09%	78.98%	48.92%	50.41%	1.7%	1.12%	0.54%	0.09%	1.59%	2.35%
129	58,829	-682	-1.15%	79.68%	41.55%	54.87%	4.26%	1.55%	3.05%	0.23%	3.51%	4.35%
130	59,203	-308	-0.52%	74.35%	37.74%	59.91%	3.86%	1.68%	1.55%	0.31%	3.32%	4.14%
131	58,890	-621	-1.04%	72.96%	75.64%	17.62%	5.87%	1.96%	6.67%	0.33%	5%	6.69%
132	59,142	-369	-0.62%	79.05%	42.23%	52.34%	7.8%	1.64%	3.52%	0.31%	5.62%	5.23%
133	58,893	-618	-1.04%	79.5%	66.38%	32.15%	5.69%	1.15%	0.75%	0.1%	1.97%	2.23%
134	59,575	64	0.11%	78.9%	70.7%	27.74%	2.61%	1.97%	1.01%	0.07%	2.29%	3.47%
135	59,870	359	0.60%	76.34%	75.06%	23.24%	2.71%	1.84%	0.98%	0.1%	2.57%	3.59%
136	59,298	-213	-0.36%	76.51%	68.22%	28.67%	3.64%	1.83%	1.82%	0.09%	3.37%	3.77%
137	59,551	40	0.07%	76.17%	44.85%	52.13%	4.48%	1.29%	2.19%	0.25%	3.35%	3.8%
138	58,912	-599	-1.01%	77.55%	77%	19.32%	3.31%	1.25%	3%	0.19%	3.09%	4.26%
139	59,010	-501	-0.84%	77.14%	73.58%	20.27%	6.36%	2.28%	5.09%	0.38%	5.27%	6.48%
140	59,294	-217	-0.36%	74.9%	37.7%	57.63%	8.02%	1.82%	1.93%	0.4%	6.54%	5.55%
141	59,019	-492	-0.83%	75.7%	37.56%	57.46%	6.55%	1.83%	3.57%	0.55%	5.25%	5.65%
142	59,312	-199	-0.33%	76.47%	46.1%	51.26%	3.27%	1.34%	2.5%	0.15%	2.54%	3.57%
143	59,432	-79	-0.13%	76.41%	45.06%	50.17%	7.06%	1.82%	1.77%	0.14%	6.32%	4.97%
144	59,307	-204	-0.34%	77.61%	75.85%	20.98%	3.3%	1.85%	2.06%	0.07%	3%	3.59%
145	58,805	-706	-1.19%	76.68%	45.44%	50.3%	4.1%	1.21%	2.13%	0.09%	3.93%	2.9%
146	60,203	692	1.16%	74.06%	68.04%	27.61%	4.73%	1.9%	4.05%	0.25%	4.21%	5.71%
147	60,375	864	1.45%	76.4%	63.51%	28.87%	6.83%	2.07%	5.79%	0.19%	5.96%	5.93%
148	59,984	473	0.79%	77.71%	63.8%	34.02%	3.08%	1.45%	1.2%	0.08%	2.62%	2.97%
149	59,715	204	0.34%	79.14%	48.08%	50.03%	2.13%	1.09%	1.31%	0.12%	2.12%	2.56%
150	59,276	-235	-0.39%	79.37%	41.44%	53.56%	6.13%	1.01%	1.39%	0.14%	5.31%	2.62%
151	60,059	548	0.92%	78.21%	51.59%	42.41%	7.28%	1.54%	1.95%	0.43%	6.22%	3.7%
152	60,134	623	1.05%	76.54%	71.41%	26.06%	2.34%	1.71%	1.92%	0.15%	2.22%	3.21%
153	59,299	-212	-0.36%	77.05%	30.1%	67.95%	2.55%	0.98%	1.34%	0.12%	2.24%	2.54%
154	59,994	483	0.81%	78.8%	44.27%	54.82%	1.67%	1.3%	0.56%	0.09%	1.43%	2.17%
155	58,759	-752	-1.26%	76.94%	62.52%	35.85%	2.22%	1.28%	1.17%	0.09%	1.94%	2.62%
156	59,444	-67	-0.11%	77.16%	65.37%	30.25%	6.88%	1.48%	0.82%	0.07%	5.64%	3.4%
157	59,957	446	0.75%	75.57%	69.33%	24.67%	8.96%	1.49%	0.77%	0.13%	7.46%	3.5%
158	59,440	-71	-0.12%	76.63%	65.77%	31.19%	4.52%	1.46%	0.89%	0.12%	3.79%	3.03%
159	59,895	384	0.65%	74.92%	73.8%	24.5%	2.87%	2.26%	0.96%	0.11%	2.61%	4%
160	59,935	424	0.71%	80.18%	73.88%	22.6%	5.04%	1.8%	2.29%	0.25%	4.02%	4.58%
161	60,097	586	0.98%	73.83%	67.28%	27.14%	6.82%	2.24%	3.94%	0.21%	5.91%	6.29%
162	60,308	797	1.34%	77.49%	47.37%	43.73%	9.58%	1.86%	4.96%	0.41%	8.28%	6.16%
163	60,123	612	1.03%	80.6%	47.16%	45.49%	7.38%	1.56%	4.26%	0.21%	6.32%	4.65%
164	60,101	590	0.99%	76.29%	69.02%	23.47%	8.49%	2.31%	5.32%	0.32%	7.11%	7.08%
165	59,978	467	0.78%	80.44%	43.56%	50.33%	5.33%	1.4%	4.16%	0.24%	4.41%	3.79%
166	60,242	731	1.23%	78.98%	90.3%	5.67%	4.07%	1.7%	3.42%	0.16%	3.9%	4.93%
167	59,493	-18	-0.03%	74.19%	72.91%	22.28%	7.41%	2.65%	2.08%	0.34%	6%	5.82%

Population Summary

District	Population	Deviation	% Devn.	[% 18+ _Pop]	[% 18+ _AP _Wht]	[% 18+ _AP _Blk]	[% H18+ _Pop]	[% 18+ _AP _Ind]	[% 18+ _AP _Asn]	[% 18+ _AP _Hwn]	[% 18+ _AP _Oth]	[% 18+ _2+ _Races]
168	60,147	636	1.07%	74.6%	48.02%	46.26%	10.3%	2.3%	3.38%	0.99%	7.58%	7.71%
169	59,138	-373	-0.63%	76.54%	65.58%	29.04%	7.66%	1.59%	1.08%	0.08%	6.28%	3.43%
170	60,116	605	1.02%	75.38%	70.1%	24.22%	8.65%	1.75%	1.46%	0.08%	7.23%	4.6%
171	59,237	-274	-0.46%	77.6%	57.1%	39.6%	4.63%	1.33%	0.76%	0.05%	4.1%	2.82%
172	59,961	450	0.76%	74.64%	68.01%	23.32%	13.42%	1.83%	0.98%	0.08%	10.79%	4.85%
173	59,743	232	0.39%	75.81%	59.57%	36.27%	5.35%	1.93%	1.1%	0.06%	4.78%	3.57%
174	59,852	341	0.57%	76.46%	79%	17.37%	7.96%	2.25%	0.84%	0.17%	4.3%	3.66%
175	59,993	482	0.81%	74.52%	71.97%	24.17%	5.03%	1.81%	2.39%	0.2%	4.3%	4.58%
176	59,470	-41	-0.07%	75.65%	72.53%	22.68%	8.24%	1.8%	1.26%	0.23%	6.32%	4.51%
177	59,992	481	0.81%	76.7%	42.4%	53.88%	6.12%	1.65%	1.93%	0.27%	4.89%	4.64%
178	59,877	366	0.62%	76.22%	82.05%	14.79%	5.14%	1.56%	0.73%	0.07%	3.95%	2.98%
179	59,356	-155	-0.26%	79.45%	68.68%	27.03%	6.38%	1.57%	1.47%	0.24%	5.56%	4.29%
180	59,412	-99	-0.17%	76.35%	78.29%	18.21%	5.62%	2.62%	2.52%	0.32%	4.28%	5.81%

Total: 10,711,908**Ideal District: 59,511****Summary Statistics:**

Population Range: 58,678 to 60,375
Ratio Range: 0.03
Absolute Range: -833 to 864
Absolute Overall Range: 1,697
Relative Range: -1.40% to 1.45%
Relative Overall Range: 2.85%
Absolute Mean Deviation: 372.39
Relative Mean Deviation: 0.63%
Standard Deviation: 433.63

EXHIBIT B

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Expert Report for Georgia 2023 Remedial Redistricting Plans

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1 Introduction and Qualifications

I have been asked by counsel for the Georgia Secretary of State to compose a report to evaluate the remedial redistricting maps that were passed by the Georgia State Legislature and signed by Governor Kemp on December 8, 2023.

I am an associate professor of political science at Brigham Young University and director of the Center for the Study of Elections and Democracy in Provo, Utah. I received my PhD in political science from Princeton University in 2014 with emphases in American politics and quantitative methods/statistical analyses. In my position as a professor of political science, I have conducted research on a variety of election- and voting-related topics in American politics and public opinion. Much of this research has been published in my discipline's top peer-reviewed journals. I have published more than 20 peer-reviewed articles. I have worked as an expert witness in a number of redistricting cases in which I have been asked to analyze and evaluate various political and geographic-related data and maps, including in New York, Ohio, Pennsylvania, Louisiana, and North Carolina. I have previously provided expert reports in several other cases related to voting, redistricting, and Section 2 of the Voting Rights Act for groups representing both Republican, Democratic, and non-partisan interests. Cases in which I have testified at trial or by deposition are listed in my CV, which is attached to the end of this report. Outside of litigation and courtrooms, I also recently contracted to work with the Virginia Office of Civil Rights as a voting rights expert consultant.

The analysis and opinions I provide below are consistent with my education, training in statistical analysis, and knowledge of the relevant academic literature. These skills are well-suited for this type of analysis in political science and quantitative analysis more generally. My conclusions stated herein are based upon my review of the information available to me at this time. I am being compensated at a rate of \$500.00 per hour. My compensation does not depend in any way on the outcome of the case or on the opinions or testimony that I provide. I reserve the right to update and revise this report as new information becomes available.

1.1 Summary of Conclusions:

- In its October 26, 2023 order, the Court required the drawing of an additional majority-Black Congressional district, two new majority-Black Senate districts, and five new majority-Black House districts.
- The remedial maps closely adhere to the Court's instructions and create an additional majority-Black Congressional district, two new majority-Black Senate districts, and five new majority-Black House districts.
- These new majority-BVAP districts are similar to districts put forward by plaintiffs in either their illustrative maps from the trial or newly proposed remedial maps.
- The new remedial maps increase the number of Black voters who reside in majority-BVAP districts.
- Plaintiffs' criticisms of the new majority-BVAP districts in the remedial maps often also apply to the plaintiffs' own illustrative and proposed remedial maps, and would lead to the conclusion that the plaintiffs' own proposed remedial maps are possibly also in violation of the Court's order and Section 2 of the VRA.

2 Congressional Map

2.1 Maps of Remedial Districts

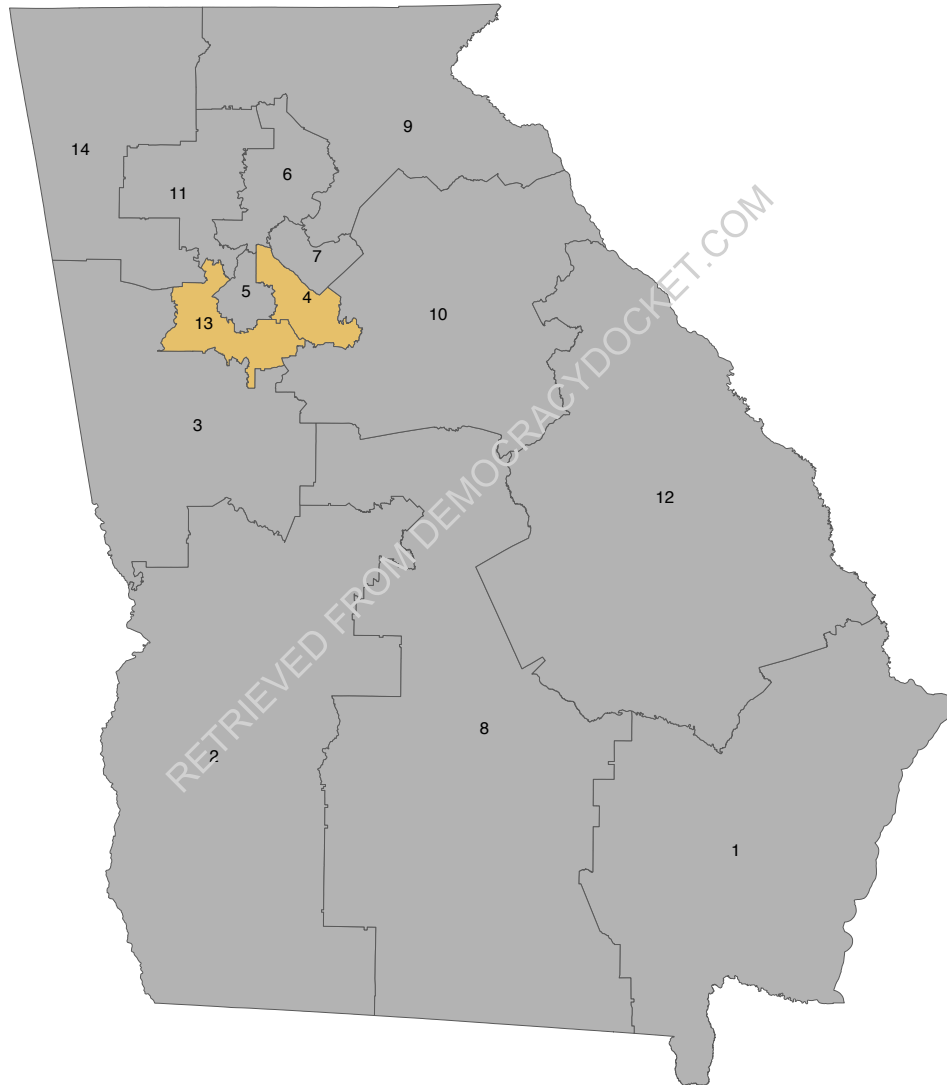
The first map below shows the 2021 congressional district boundaries. The second map shows the boundaries of the 2023 remedial congressional map. Districts in yellow are majority BVAP. Districts in blue are the newly created majority-BVAP districts in the remedial map.

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2021 Enacted Congressional Map




Majority-BVAP districts highlighted in yellow

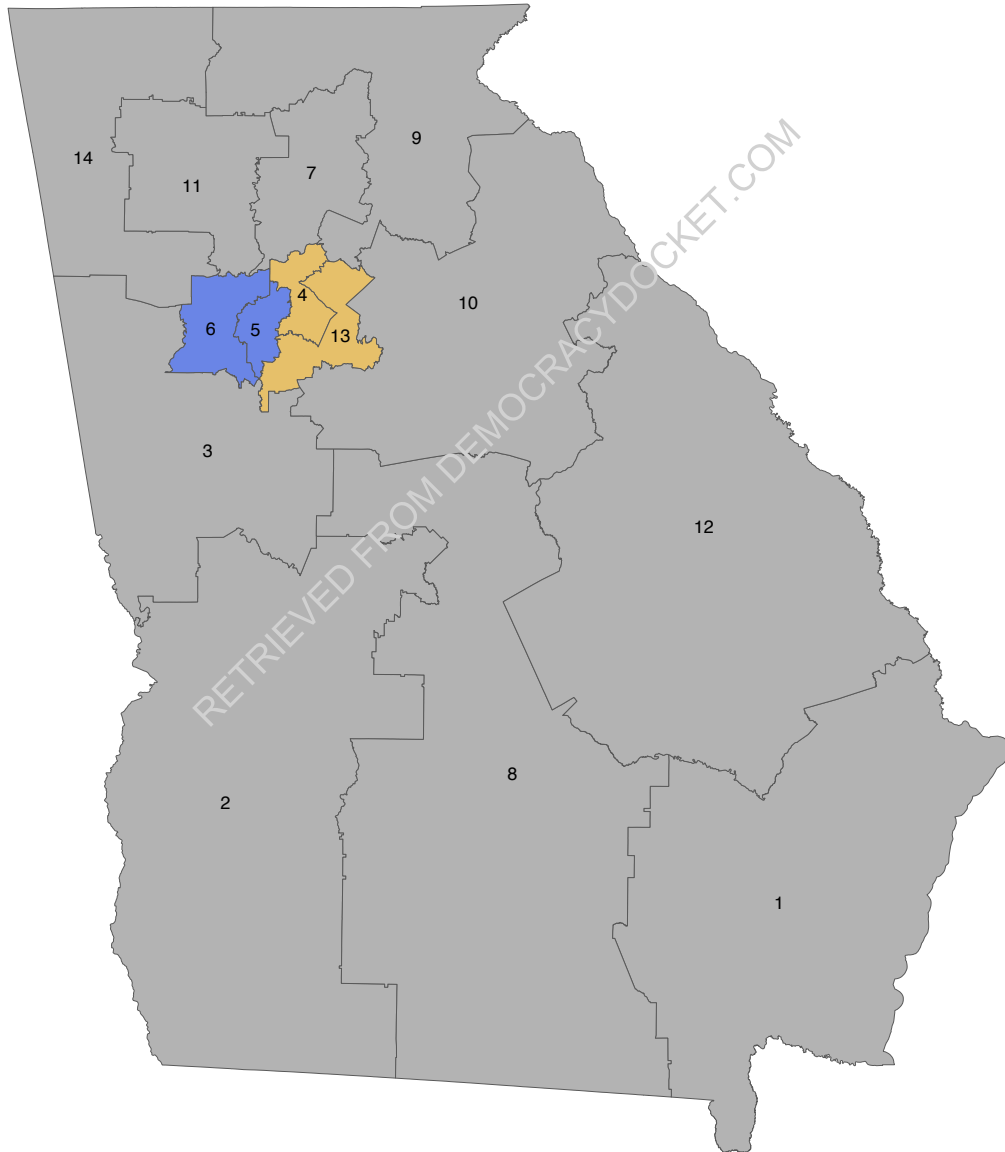
 Maj-BVAP  Non Maj-BVAP



2023 Remedial Congressional Map

New Majority-BVAP districts highlighted in blue

 Maj-BVAP  New Maj-BVAP  Non Maj-BVAP



2.2 Number of Majority Black Voting Age Population (BVAP) Districts

The 2021 enacted Congressional map contained 2 majority any-part BVAP districts (13 and 4), 2 districts that were not majority BVAP but were majority any-part Black (2 and 5), and one district that was majority minority (7). Collectively, there were 5 majority-minority VAP districts in the 2021 plan (2, 4, 5, 7, and 13).

District 7 requires a little more explanation because the demographics of that district change dramatically depending on the population statistics one uses. Using voting age population, old CD-7 was 29.82% any-part BVAP and 21.27% HVAP, for a Black + Hispanic voting age population of 51.09%. However, the any-part Black statistic includes Black individuals who also identify as Hispanic, so the combination of these two categories will double count people who fall into both categories. Using the Non-Hispanic Black VAP statistics, old CD-7 was 27.3% NH-BVAP, 21.27% HVAP, for a total Black + Hispanic population of 48.6%. Adding non-Hispanic Asian VAP from the district (14.9%) is required for the district to move above the majority-minority VAP threshold. Finally, the citizen voting age population (CVAP) statistics also change because of the large proportion of Hispanic adults who are not citizens. Using CVAP numbers, old CD-7 was 31.93% NH single-race Black, 10.21% Hispanic, and 11.79% single-race non-Hispanic Asian. Together these three groups constituted 53.93% of the district's citizen voting age population.¹

The 2023 remedial map now contains 4 majority any-part BVAP districts (4, 5, 6, and 13). District 2 in the 2023 remedial map remains unchanged from the 2021 map and still has a majority any-part Black population and majority-minority voting age population. Collectively, there are 5 majority-minority VAP districts in the 2023 remedial map (2, 4, 5, 6, and 13).

Several of the plaintiffs' objections to the 2023 remedial Congressional map center around changes made to old CD-7, with accompanying claims that this district was protected under Section 2 of the Voting Rights Act. An assessment of whether or not old CD-7 qualifies as a protected Section 2 district and meets the various *Gingles* criteria is a question for the court,

¹See Cooper report, Exhibits G and H.

but several pieces of information are helpful for the Court in making that determination. First, no single racial group is a majority in the district. Second, no two minority groups constitute a majority in the district when calculated using CVAP statistics, as is common in Section 2 cases involving Hispanic and/or Asian populations. Thus, the district was majority-minority by combining Black, Hispanic, and Asian voters, as noted above. While these groups appear to have similar partisan preferences in this region when voting in partisan general elections (see expert report of Dr. Palmer, page 3), it is not clear, nor have I been presented with any analysis to show if these three groups share cohesive preferences in their choice of which candidate to nominate in primary elections.

Table 1: Racial statistics for Congressional Maps

2021 Enacted Map			2023 Remedial Map		
District	BVAP %	Minority VAP %	District	BVAP %	Minority VAP %
13	66.75	81.18	6	51.75	67.20
4	54.52	71.75	13	51.45	72.17
5	49.6	62.08	5	51.06	66.35
2	49.29	57.27	4	50.59	78.25
12	36.72	45.35	2	49.29	57.27
8	30.04	39.48	12	36.72	45.35
7	29.82	67.22	8	30.04	39.48
1	28.17	39.59	1	28.17	39.59
3	23.32	33.17	10	23.69	34.72
10	22.6	33.8	3	23.32	33.17
11	17.95	36.01	11	12.83	30.63
14	14.28	28.67	9	12.65	35.49
9	10.42	31.71	14	12.59	26.88
6	9.91	33.37	7	8.93	33.23

Note: Districts are sorted by BVAP percentages in each map. Districts highlighted in yellow are majority-BVAP. Districts highlighted in green are majority-minority. Districts highlighted in Blue are newly majority-BVAP in the 2023 remedial map. BVAP is calculated from the 2020 US Census “any-part Black 18+”. Minority VAP is 100 minus Non-Hispanic White 18+ percent.

2.3 BVAP Assigned to Majority-BVAP Districts

Overall, the remedial congressional map increases the number of Black voters who reside in majority-BVAP districts compared to the 2021 enacted congressional map. The table below shows that in the 2021 congressional map 27% of Black voters resided in majority-BVAP districts. In the 2023 remedial map this number increases to 46.4%. On page 514 of the Court’s October 26, 2023 order, the Court states, “SB 2EX violates Section 2 of the Voting Rights Act as to the following districts/areas: Enacted Congressional Districts 3, 6, 11, 13, and 14.” If we limit the inquiry to these five districts, 50.0% of Black voters in this area resided in majority BVAP districts in the 2021 congressional map. Remaining within this area, but looking at the 2023 remedial congressional map, 57.2% of Black voters in this area now reside in majority BVAP districts under the remedial congressional map.

Table 2: Black Voters Residing in Majority-BVAP Congressional Districts

Congressional Maps	% of Black voting age population living in a majority-BVAP district
Statewide	
2021 Enacted	27.0%
2023 Remedial	46.4%
Within 2021 districts Court listed in ordering paragraphs	
2021 Enacted	50.0%
2023 Remedial	57.2%

Note: Page 514 of the Court’s October 26, 2023 order states, “SB 2EX violates Section 2 of the Voting Rights Act as to the following districts/areas: Enacted Congressional Districts 3, 6, 11, 13, and 14.” The bottom half of the table limits the calculations to the area covered by those districts.

2.4 Similarity to Illustrative Districts

Overall, remedial CD-6 is quite similar to CD-6 in the plaintiff’s own illustrative maps. The majority of the population in remedial CD-6 is contained in CD-6 in the Cooper illustrative map. Table 3 shows how the population of the new majority-BVAP remedial Congressional

district relates to the illustrative Congressional districts and the degree to which they overlap. The illustrative district that contains the largest overlap is bolded. For example, remedial CD-6 contains 72.5% of Cooper illustrative CD-6's total population and 80.8% of the BVAP in Cooper illustrative CD-06.

Table 3: Similarity between Remedial Senate Districts and Illustrative Districts

Remedial Congressional District 6:		Shared Population	
Illustrative District:		Total	BVAP
Cooper CD-6		72.5%	80.8%
Cooper CD-5		25.3%	16.8%
Cooper CD-13		2.16%	2.37%
		100%	100.0%

Note: The overwhelming majority of the total population and Black voting age population in remedial CD-6 is contained in Cooper illustrative CD-6. The illustrative district that contains the largest overlap is bolded.

2.5 Electoral Effectiveness

All four of the majority-BVAP districts in the 2023 plan and the remaining majority-minority district (CD-2) have performed uniformly for Democratic candidates in past statewide general elections. To measure this I looked at the general election results of 15 statewide election contests from 2106-2022 in each of the districts. Table 4 below shows the proportion of those elections in which the Democratic candidate won a majority of the two-party votes cast in that district.² The table also shows the electoral performance of the 2021 congressional districts for reference. In both maps there are five congressional districts that are likely to be solidly Democratic in future elections.

²The specific elections considered are: 2022: Attorney General, Governor, Secretary of State, US Senate, Lt. Governor; 2021: US Senate Runoff, US Special Senate Runoff; 2020: US Special Senate, US Senate, President; 2018: Attorney General, Governor, Lt. Governor; 2016: President, US Senate.

Table 4: Reconstituted Election Results in Congressional Districts

2021 Districts	% of elections where Democrat wins	Remedial Districts	% of elections where Democrat wins
CD-1	0%	CD-1	0%
CD-2	100%	CD-2	100%
CD-3	0%	CD-3	0%
CD-4	100%	CD-4	100%
CD-5	100%	CD-5	100%
CD-6	0%	CD-6	100 %
CD-7	100%	CD-7	0%
CD-8	0%	CD-8	0%
CD-9	0%	CD-9	0%
CD-10	0%	CD-10	0%
CD-11	0%	CD-11	0%
CD-12	0%	CD-12	0%
CD-13	100%	CD-13	100%
CD-14	0%	CD-14	0%

Note: Performance is based on the percent of the two-party vote won by the Democratic candidate in the district for 15 statewide elections between 2016 and 2022. Yellow districts are majority-BVAP. Green districts are majority-minority VAP. Blue districts are newly created majority-BVAP districts in the remedial Congressional map.

3 State Senate

3.1 Maps of Remedial Districts

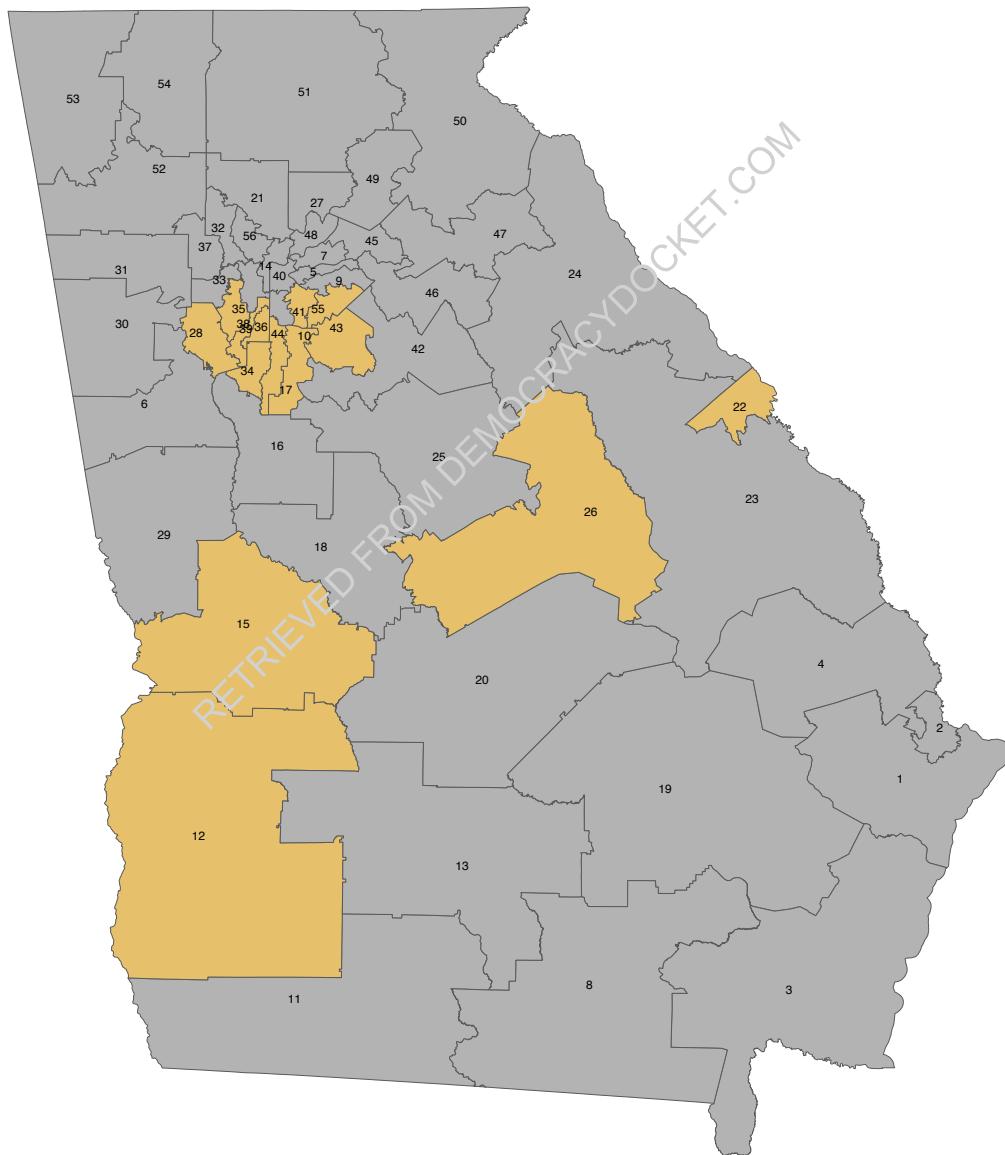
The first map below shows the 2021 Senate district boundaries. The second map shows the boundaries of the 2023 remedial Senate map. Districts in yellow are majority BVAP. Districts in blue are the newly created majority-BVAP districts in the remedial Senate map.

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2021 Enacted Senate Map

Majority-BVAP districts highlighted in yellow

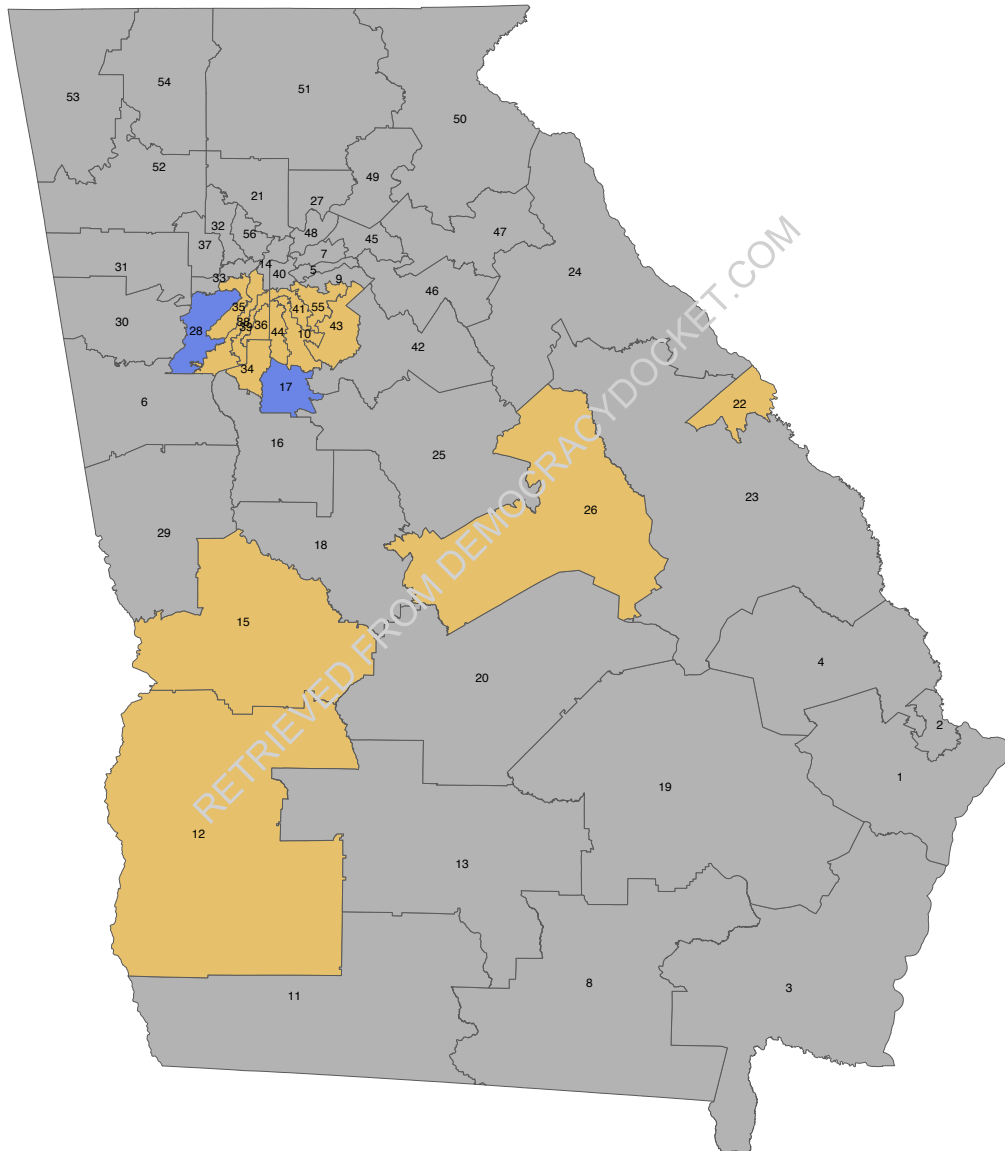
 Maj-BVAP  Non Maj-BVAP



2023 Remedial Senate Map

New Majority-BVAP districts highlighted in blue

Maj-BVAP New Maj-BVAP Non Maj-BVAP



3.2 Number of Majority-BVAP Districts

The 2021 enacted Senate map contained 14 majority any-part BVAP districts, 6 districts that were not majority BVAP but were majority-minority.³

The 2023 remedial Senate map adds two additional majority-BVAP districts, SD-17 and SD-28 for a total of 16 majority BVAP Senate districts throughout the state. The 2023 remedial Senate map also contains 6 districts that were not majority BVAP but were majority minority.

Table 5 shows the BVAP and minority VAP percentages for districts in the 2021 and 2023 remedial Senate maps. Districts are sorted by BVAP percentages in each map. Districts highlighted in yellow are majority-BVAP. Districts highlighted in green are majority-minority. Districts highlighted in Blue are newly majority-BVAP in the 2023 remedial map.

³Non-White percentage is defined as 100 minus the non-Hispanic single-race White VAP percentage.

Table 5: Racial Statistics for Senate Maps

2021 Enacted Map			2023 Remedial Map		
District	BVAP %	Minority VAP %	District	BVAP %	Minority VAP %
35	71.90	81.18	34	69.54	86.64
10	71.46	80.36	10	65.24	74.55
44	71.34	84.71	43	63.76	75.04
34	69.54	86.64	17	63.61	76.45
55	65.97	79.44	55	62.18	76.35
38	65.30	78.13	38	60.88	70.18
43	64.33	73.47	41	58.46	76.72
41	62.61	78.61	12	57.97	63.29
39	60.70	72.13	26	56.99	63.40
12	57.97	63.29	22	56.50	65.62
26	56.99	63.40	28	56.42	71.60
22	56.50	65.62	39	55.42	68.10
15	54.00	63.48	35	54.67	69.65
36	51.34	63.82	15	54.00	63.48
2	46.86	59.79	44	53.53	67.07
33	42.96	69.75	36	51.34	63.82
23	35.48	43.11	2	46.86	59.79
25	33.48	40.06	23	35.48	43.11
17	32.01	40.58	33	35.26	51.95
20	31.28	38.29	42	32.56	40.87
11	31.04	41.03	20	31.28	38.29
42	30.78	48.61	11	31.04	41.03
18	30.40	39.31	25	30.81	37.13
8	30.38	39.90	18	30.40	39.31
5	29.94	84.31	8	30.38	39.90
9	29.53	64.19	5	29.94	84.31
13	26.97	35.90	9	29.53	64.19
29	26.88	36.78	13	26.97	35.90
19	25.72	36.01	29	26.88	36.78
1	25.08	38.01	19	25.72	36.01
6	23.90	42.21	1	25.08	38.01
4	23.37	33.22	30	23.71	34.08
16	22.70	33.09	4	23.37	33.22
7	21.44	62.16	16	22.70	33.09
3	21.18	31.12	7	21.44	62.16
30	20.92	30.59	3	21.18	31.12
31	20.70	31.74	31	20.70	31.74
24	19.85	30.19	24	19.85	30.19
28	19.51	30.56	37	19.27	34.63
37	19.27	34.63	40	19.24	53.66
40	19.24	53.66	14	18.97	42.90
14	18.97	42.90	45	18.58	44.53
45	18.58	44.53	47	17.42	32.54
47	17.42	32.54	6	17.28	27.68
46	16.90	30.10	46	16.90	30.10
32	14.86	34.22	32	14.86	34.22
52	13.04	25.26	52	13.04	25.26
48	9.47	47.75	48	9.47	47.75
49	7.96	34.36	49	7.96	34.36
56	7.57	23.83	56	7.57	23.83
21	7.46	26.13	21	7.46	26.13
50	5.61	18.46	50	5.61	18.46
53	5.10	12.69	53	5.10	12.69
27	5.00	28.50	27	5.00	28.50
54	3.79	30.02	54	3.79	30.02
51	1.21	9.76	51	1.21	9.76

Note: Districts are sorted by BVAP percentages in each map. Districts highlighted in yellow are majority-BVAP. Districts highlighted in green are majority-minority. Districts highlighted in Blue are newly majority-BVAP in the 2023 remedial map. BVAP is calculated from the 2020 US Census “any-part Black 18+”. Minority VAP is 100 minus Non-Hispanic single-race White 18+ percent.

3.3 BVAP Assigned to Majority-BVAP Senate Districts

Overall, the remedial Senate map increases the number of Black voters who reside in majority-BVAP Senate districts compared to the 2021 enacted Senate map. Table 6 below shows that in the 2021 Senate map 49.7% of Black voters resided in majority-BVAP Senate districts. In the 2023 remedial map this number increases to 53.5%. On page 514 of the Court’s October 26, 2023 order, the Court states, “SB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted Senate Districts 10, 16, 17, 25, 28, 30, 34, 35, 43, and 44.” If we limit the inquiry to these ten districts, 72.9% of Black voters in this area resided in majority BVAP districts in the 2021 Senate map. Remaining within this area, but looking at the 2023 remedial Senate map, 73.3% of Black voters in this area now reside in majority BVAP districts under the remedial Senate map.

Table 6: Black Voters Residing in Majority-BVAP Districts

Senate Maps	% of Black voting age population living in a majority-BVAP district
Statewide	
2021 Enacted	49.7%
2023 Remedial	53.5%
Within 2021 districts Court listed in ordering paragraphs	
2021 Enacted	72.9%
2023 Remedial	73.3%

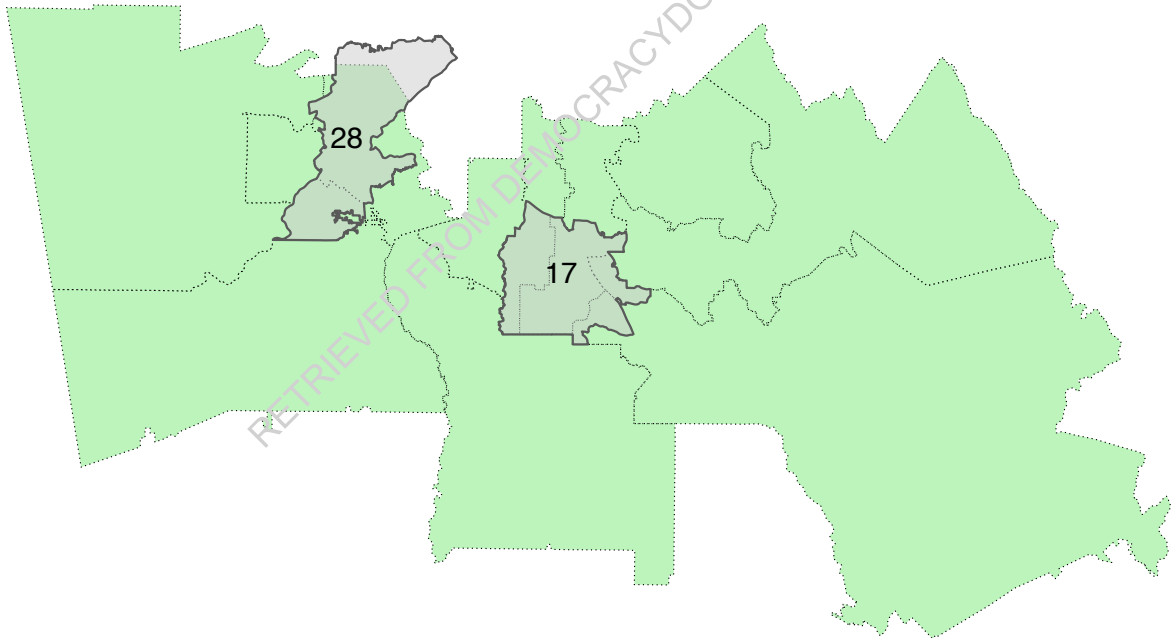
Note: Page 514 of the Court’s October 26, 2023 order states, “SB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted Senate Districts 10, 16, 17, 25, 28, 30, 34, 35, 43, and 44.” The bottom half of the table limits the calculations to the area covered by those districts.

3.4 Maps of Remedial Districts SD-17 and SD-28

The Grant plaintiffs critique the Senate remedial districts for extending outside of the 2021 Senate districts articulated on page 514 of the Court's October 26, 2023 order.⁴ However, remedial SD-17 is entirely contained in the region, so the critique is only applicable to SD-28, and a majority (56.8%) of the Black voting age population in remedial SD-28 reside within that area. Figure 1 shows a map of these two remedial Senate districts. Behind them is overlaid the area contained in the 2021 Senate districts listed in the Court's October 26, 2023 order.

Figure 1: Map of Remedial SD-17 and SD-28 Overlaid on 2021 Districts

2023 Remedial SDs–17 and 28 shown in grey
BVAP overlap: SD–17=56.8%, SD–28=100%



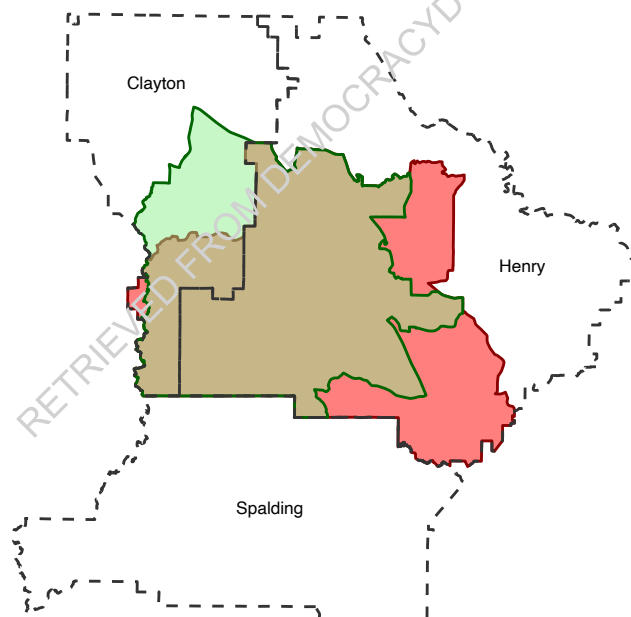
Note: 2021 Senate districts listed by the Court in ordering shown in green

⁴See, for example, page 8 of the Grant Plaintiffs' Objections to the Georgia General Assembly's Remedial State Legislative Plans. The court order specifically says: "SB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted Senate Districts 10, 16, 17, 25, 28, 30, 34, 35, 43, and 44."

The APA plaintiffs critique SD-17 for a different reason - its failure to extend southward into Spalding county.⁵ However, this critique would equally apply to another of the plaintiff's illustrative maps. Mr. Esselstyn's SD-15 illustrative district also spans Clayton and Henry counties while not extending southward into Spalding County. Furthermore, the Esselstyn illustrative district that does cover Spalding County (Esselstyn SD-16) is not majority-BVAP either. Thus, the APA plaintiff's critique that no Black voters in Spalding county will reside in a majority-BVAP district under the remedial map is also true of the Grant plaintiff's own illustrative map. The population of remedial SD-17 overlaps Esselstyn illustrative SD-25 by more than 75% and the two districts are shown in Figure 2 below.

Figure 2: Remedial SD-17 and Esselstyn Illustrative SD-25

2023 Remedial Map SD-17: green,
Esselstyn Illustrative SD-25: red
78.6% population overlap, 76.6% BVAP overlap



Note: County boundaries shown with dashed lines

⁵See pages 12-13 of Alpha Phi Alpha Plaintiffs' objections to Defendant's Remedial Proposal and Memorandum of Law.

3.5 Similarity to Illustrative Districts

Overall, remedial SD-17 and SD-28 are quite similar to majority-BVAP districts in the plaintiffs' own illustrative maps. In both cases, the majority of the population in both remedial Senate districts is contained in a majority-BVAP illustrative district in either the Cooper or Esselstyn illustrative maps. Table 7 shows how the population of each new majority-BVAP remedial Senate district relates to the illustrative Senate districts and the degree to which they overlap. The illustrative district that contains the largest overlap is bolded. For example, remedial SD-17 contains 78.6% of Esselstyn illustrative SD-25 total population and 76.6% of the BVAP in Esselstyn illustrative SD-25.

Table 7: Similarity between Remedial Senate Districts and Illustrative Districts

	Shared Population	
Illustrative District	Total	BVAP
Remedial Senate District 17:		
Esselstyn SD-25	78.6%	76.6%
Esselstyn SD-44	21.4%	23.4%
	100%	100%
Cooper SD-16	43.3%	39.3%
Cooper SD-10	13.3%	12.4%
Cooper SD-17	13.9%	14.3%
Cooper SD-28	29.6%	34.0%
	100%	100.0%
Remedial Senate District 28:		
Esselstyn SD-35	52.6%	55.8%
Esselstyn SD-28	1.6%	1.1 %
Esselstyn SD-33	19.7%	17.5 %
Esselstyn SD-38	26.1%	25.7 %
	100%	100%
Cooper SD-20	50.4%	50.6%
Cooper SD-33	33.2%	33.8%
Cooper SD-35	3.8%	6.2%
Cooper SD-38	12.6%	9.4 %
	100%	100%

Note: The majority of the population in both remedial Senate districts is contained in a majority-BVAP illustrative district in either the Cooper or Esselstyn illustrative maps. The illustrative district that contains the largest overlap is bolded.

3.6 Electoral Effectiveness

Both of the newly created majority-BVAP districts in the 2023 remedial Senate plan perform uniformly for Democratic candidates. To measure this I looked at the general election results of 15 statewide election contests from 2106-2022 in each of the districts. The table below shows the proportion of those elections in which the Democratic candidate won a majority of the two-party votes cast in that district.⁶ I also include the electoral performance of the other 14 majority-BVAP districts and 6 majority-minority districts in the remedial Senate map. For comparison, I also show the electoral performance of the 12 majority-BVAP and 6 majority-minority districts in the 2021 enacted map. All of the districts in the table in both maps are solidly Democratic.

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⁶The specific elections considered are: 2022: Attorney General, Governor, Secretary of State, US Senate, Lt. Governor; 2021: US Senate Runoff, US Special Senate Runoff; 2020: US Special Senate, US Senate, President; 2018: Attorney General, Governor, Lt. Governor; 2016: President, US Senate.

Table 8: Reconstituted Election Results in Senate Districts

2021 Districts	% of elections where Democrat wins	Remedial Districts	% of elections where Democrat wins
10	100%	17	100%
12	100%	28	100%
15	100%	10	100%
22	100%	12	100%
26	100%	15	100%
34	100%	22	100%
35	100%	26	100%
36	100%	34	100%
38	100%	35	100%
39	100%	36	100%
41	100%	38	100%
43	100%	39	100%
44	100%	41	100%
55	100%	43	100%
2	100%	44	100%
5	100%	55	100%
7	93.3%	2	100%
9	93.3%	5	100%
33	100%	7	93.3%
40	93.3%	9	93.3%
		33	100%
		40	93.3%

Note: Performance is based on the percent of the two-party vote won by the Democratic candidate in the district for 15 statewide elections between 2016 and 2022. Yellow districts are majority-BVAP. Green districts are majority-minority VAP. Blue districts are newly created majority-BVAP districts in the remedial map.

4 State House

4.1 Maps of Remedial Districts

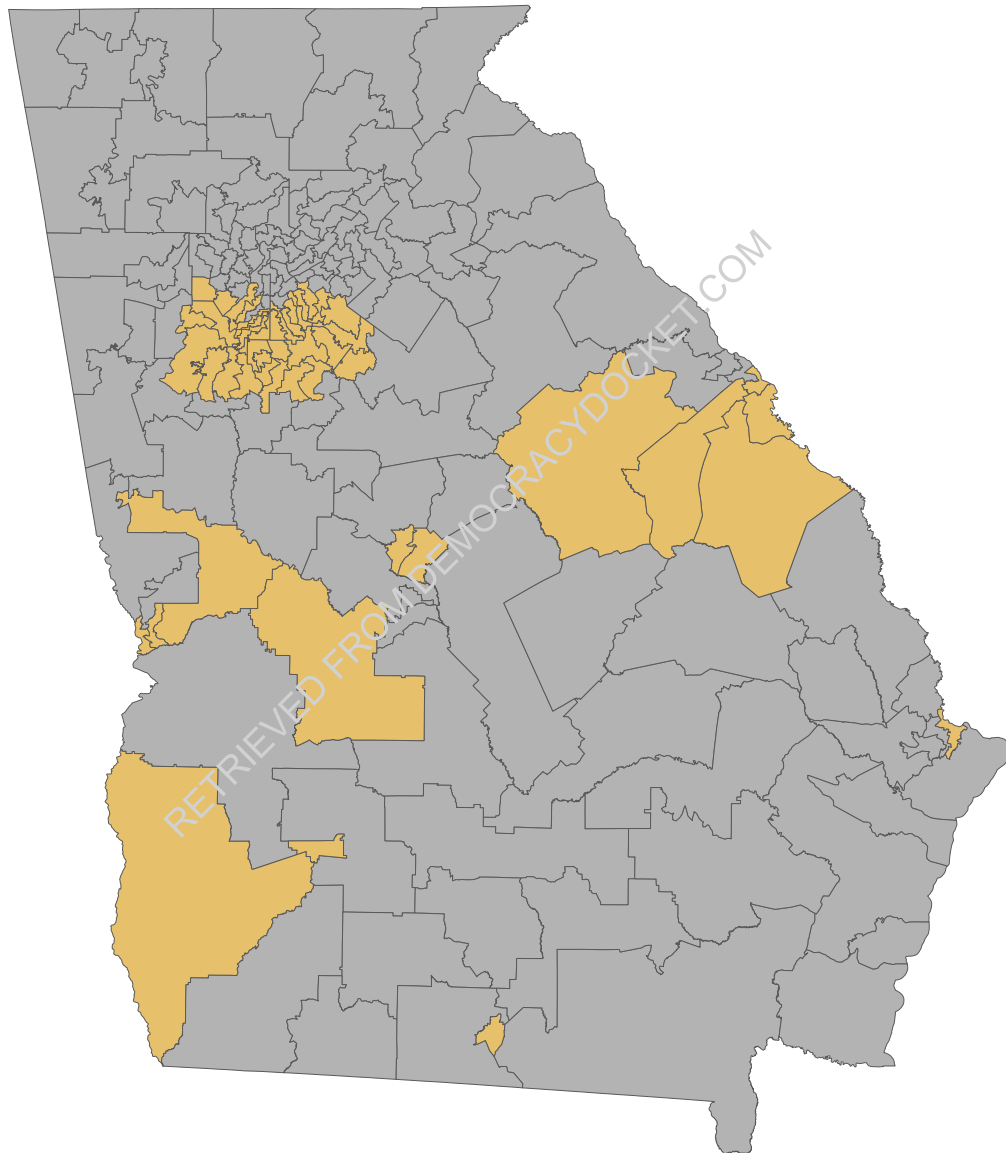
The first map below shows the 2021 House district boundaries. The second map shows the boundaries of the 2023 remedial Senate map. Districts in yellow are majority BVAP. Districts in blue are the newly created majority-BVAP districts in the remedial House map.

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2021 Enacted House Map

Majority-BVAP districts highlighted in yellow




 Maj-BVAP  Non Maj-BVAP

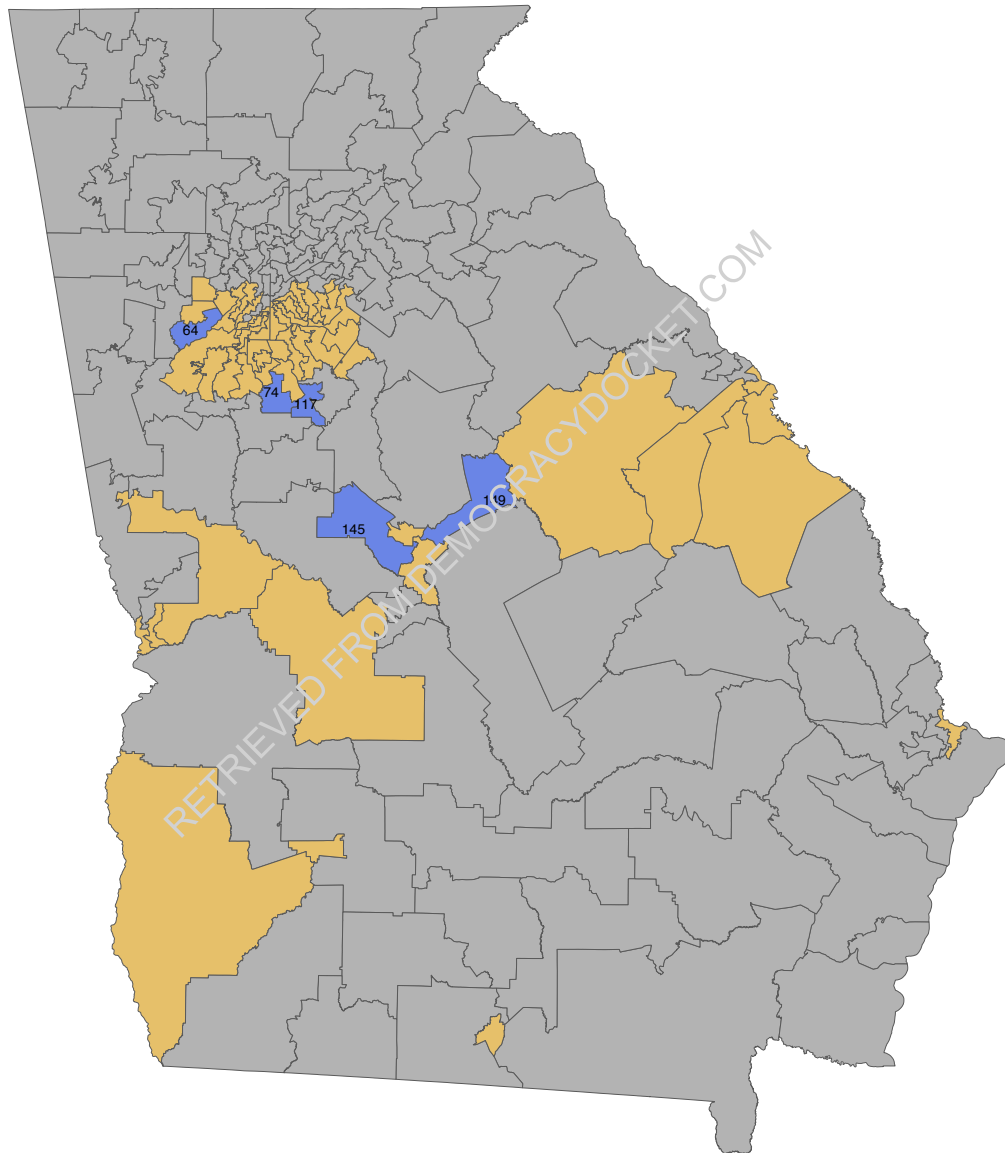


Note: District numbers omitted for clarity.

2023 Remedial House Map

New Majority-BVAP districts highlighted in blue

 Maj-BVAP  New Maj-BVAP  Non Maj-BVAP



Note: District numbers omitted except for additional majority-BVAP districts for clarity.

4.2 Number of Majority-BVAP Districts

The 2021 enacted House map contained 49 majority any-part BVAP districts and 27 districts that were not majority BVAP but were majority-minority.⁷

The 2023 remedial House map adds five additional majority-BVAP districts, HDs-64, 74, 117, 145, and 149, for a total of 54 majority BVAP House districts throughout the state. The 2023 remedial House map also contains 27 districts that were not majority BVAP but were majority-minority.

Table 9 shows the BVAP and minority VAP percentages for districts in the 2021 and 2023 remedial House maps. Districts are sorted by BVAP percentages in each map. Districts highlighted in yellow are majority-BVAP. Districts highlighted in green are majority-minority. Districts highlighted in Blue are newly majority-BVAP in the 2023 remedial House map.

⁷Non-White percentage is defined as 100 minus the non-Hispanic single-race White VAP percentage.

Table 9: Racial statistics for House Maps

2021 Enacted Map			2023 Remedial Map		
District	BVAP %	Minority VAP %	District	BVAP %	Minority VAP %
77	76.13	92.42	77	76.13	92.42
86	75.05	87.92	115	75.45	82.05
75	74.40	88.73	91	75.04	80.29
61	74.29	83.25	75	74.40	88.73
84	73.66	78.71	116	73.91	82.23
87	73.08	86.50	62	72.26	80.93
62	72.26	80.93	79	71.59	92.85
79	71.59	92.85	65	71.27	75.75
78	71.58	84.95	59	70.09	77.96
59	70.09	77.96	63	69.33	80.78
91	70.04	78.00	92	68.11	77.25
63	69.33	80.78	153	67.95	72.34
94	69.04	81.58	76	67.23	89.49
92	68.79	75.95	95	66.74	80.76
153	67.95	72.34	74	66.00	76.31
76	67.23	89.49	93	64.87	78.30
95	67.15	78.17	69	63.56	73.11
93	65.36	77.09	88	63.35	81.70
60	63.88	71.91	117	62.93	73.37
69	63.56	73.11	113	61.30	70.00
88	63.35	81.70	130	59.91	66.26
58	63.04	72.44	78	58.99	75.61
85	62.71	80.52	67	58.92	69.14
89	62.54	68.93	58	57.67	67.63
65	61.98	68.54	140	57.63	68.30
143	60.79	67.72	94	57.53	75.29
130	59.91	66.26	141	57.46	65.51
113	59.53	68.20	89	57.09	67.61
142	59.52	65.20	55	56.39	65.14
67	58.92	69.14	84	56.06	65.30
90	58.49	66.02	61	55.91	67.78
116	58.12	72.78	68	55.75	66.06
140	57.63	68.30	39	55.42	76.53
141	57.46	68.23	129	55.27	62.84
68	55.75	66.06	154	54.82	57.76
55	55.38	64.49	86	54.63	70.96
39	55.29	76.53	126	54.47	60.03
129	54.87	62.84	66	54.28	68.80
154	54.82	57.76	38	54.23	69.90
126	54.47	60.03	177	53.88	62.88
38	54.23	69.90	87	53.86	72.83
177	53.88	62.88	150	53.56	61.69
150	53.56	61.69	60	52.93	62.67
66	53.41	66.07	64	52.43	63.46
132	52.34	64.37	132	52.34	64.37
137	52.13	59.18	137	52.13	59.18
115	52.13	63.05	85	51.92	72.04
128	50.41	53.55	142	51.26	57.51
165	50.33	60.82	90	51.11	59.63
110	47.19	61.42	128	50.41	53.51
168	46.26	60.71	165	50.33	60.82
163	45.49	58.08	145	50.30	57.49
56	45.48	63.02	143	50.17	60.03
162	43.73	59.38	149	50.03	54.51
151	42.41	52.80	56	49.38	65.76
41	39.35	72.38	168	46.26	60.71
102	37.62	69.35	163	45.49	58.08
106	36.27	58.78	110	43.99	61.94
42	33.70	61.00	162	43.73	59.38
109	32.51	84.56	151	42.41	52.80
107	29.63	78.04	102	40.31	69.64
105	29.05	58.26	41	39.35	72.38
37	28.18	53.74	109	32.96	86.10
97	26.77	63.56	35	31.54	50.65
43	26.53	53.69	42	31.03	57.12
101	24.19	59.86	43	30.25	55.99
98	23.25	88.34	106	26.95	69.98
96	23.00	79.68	97	26.77	63.56
81	21.83	52.99	37	24.92	51.89
108	18.35	56.64	107	24.68	66.63
83	15.12	52.10	105	23.53	53.57
99	14.71	57.90	98	23.25	88.34
80	14.18	52.37	96	23.00	79.68
29	13.59	57.71	101	21.15	51.49
50	12.40	55.63	108	17.28	54.11
4	5.38	52.22	83	15.12	52.10
			99	14.71	57.90
			80	14.18	52.37
			29	13.59	57.71
			50	12.40	55.63
			4	5.38	52.22

Note: Districts are sorted by BVAP percentages in each map. Districts highlighted in yellow are majority-BVAP. Districts highlighted in green are majority-minority. Districts highlighted in Blue are newly majority-BVAP in the 2023 remedial map. BVAP is calculated from the 2020 US Census “any-part Black 18+”. Minority VAP is 100 minus Non-Hispanic White 18+ percent. Districts that are not majority-BVAP are omitted to conserve space.

4.3 BVAP Assigned to Majority-BVAP Districts

Overall, the remedial House map increases the number of Black voters who reside in majority-BVAP House districts compared to the 2021 enacted House map. Table 10 below shows that in the 2021 House map 53.5% of Black voters resided in majority-BVAP House districts. In the 2023 remedial map this number increases to 56.6%. On page 514 of the Court's October 26, 2023 order, the Court states, "HB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted House Districts 61, 64, 74, 78, 117, 133, 142, 143, 145, 147, and 149." If we limit the inquiry to these eleven districts, 53.7% of Black voters in this area resided in majority BVAP districts in the 2021 House map. The APA Plaintiff's critique the remedial House map for failing to add sufficient Black voters into remedial majority-BVAP districts.⁸ However, the remedial map dramatically increases the number of Black voters in majority-BVAP districts within this region. Remaining within the court-defined area, the 2023 remedial House map places 74.3% of Black voters in this area in majority BVAP districts.

⁸See, for example, pages 20-21 of the APA Objections to Defendant's Remedial Proposal and Memorandum of Law. However, their critiques are limited to the Atlanta area, as they state: "The 2023 Proposed House Plan's lines in the Macon-Bibb area do appear to include Black voters from the vote-dilution area in new majority-Black districts in numbers comparable to the APA remedial plan" (pg. 21).

Table 10: Black Voters Residing in Majority-BVAP House Districts

House Maps	% of Black voting age population living in a majority-BVAP District
Statewide	
2021 Enacted	53.5%
2023 Remedial	56.6%
Within 2021 districts Court listed in ordering paragraphs	
2021 Enacted	53.7%
2023 Remedial	74.3%

Note: Page 514 of the Court's October 26, 2023 order states, "HB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted House Districts 61, 64, 74, 78, 117, 133, 142, 143, 145, 147, and 149." The bottom half of the table limits the calculations to the area covered by those districts.

4.4 Remedial House District 64 - West-metro Atlanta

The Grant plaintiffs critique the House remedial districts for extending outside of the 2021 House districts articulated on page 514 of the Court's October 26, 2023 order.⁹ However, this critique, in many cases, applies to the proposed remedial map put forward by the APA plaintiffs expert, Mr. Cooper. In other words, if the Grant plaintiffs are correct in their criticisms, then they would lead to the conclusion that the APA plaintiffs' proposed remedial map is possibly also in violation of the Court's order and Section 2 of the VRA.

The left panel of Figure 3 shows a map of HD-64, one of the five new majority-BVAP districts in the remedial House map. Remedial HD-64 extends across 2021 HDs 61 and 64 with 32.5% of remedial HD-64's population contained in the green area delineating the two 2021 House districts mentioned by this Court in this area. Given the particular orientation of these two districts that were mentioned by the Court in its October order, it would be especially difficult to draw any new majority-BVAP district that is entirely, or even largely, contained in this area. The two districts are somewhat horseshoe shaped with only a small geographic connection at the northern end. In fact, the Cooper proposed remedial map draws district 64 in much the same way.¹⁰ As seen in the figure, the APA plaintiffs' proposed remedial map contains less overlap with the court-delineated region than the remedial map passed by the state.

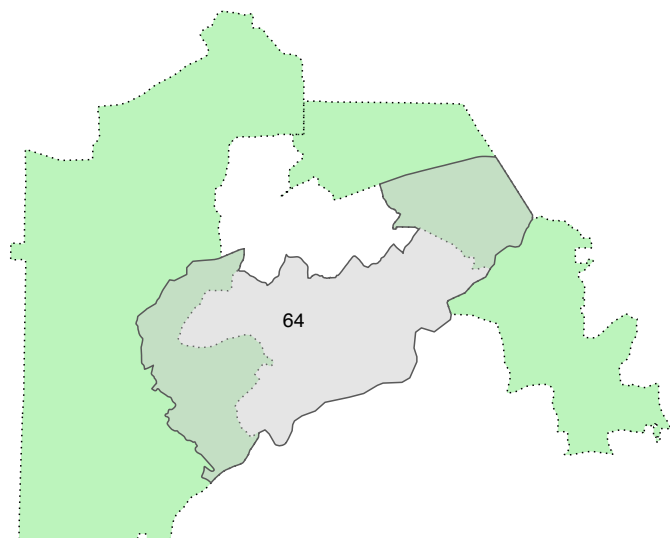
Remedial HD-64 is also quite similar to majority-BVAP districts in the plaintiffs' illustrative maps. The majority of the population in remedial HD-64 is contained in a majority-BVAP illustrative district in the Esselstyn illustrative map (Esselstyn HD-61). Table 11 shows how the population of remedial HD-64 relates to the illustrative House districts and the degree to which the populations overlap. The illustrative district that contains the largest overlap is bolded for each illustrative map. For example, remedial SD-64 contains 54.7% of Esselstyn illustrative HD-61 total population and 52.2% of the BVAP in Esselstyn illustrative HD-61.

⁹See, for example, pages 9-12 of the Grant Plaintiffs' Objections to the Georgia General Assembly's Remedial State Legislative Plans. The court order specifically says: "SB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted Senate Districts 10, 16, 17, 25, 28, 30, 34, 35, 43, and 44."

¹⁰It is important to note that this is the proposed remedial map, not the original illustrative map. This is important because Mr. Cooper drew this map with the same information as the state legislature regarding the areas articulated by the Court regarding the particular location of Section 2 violations throughout the state.

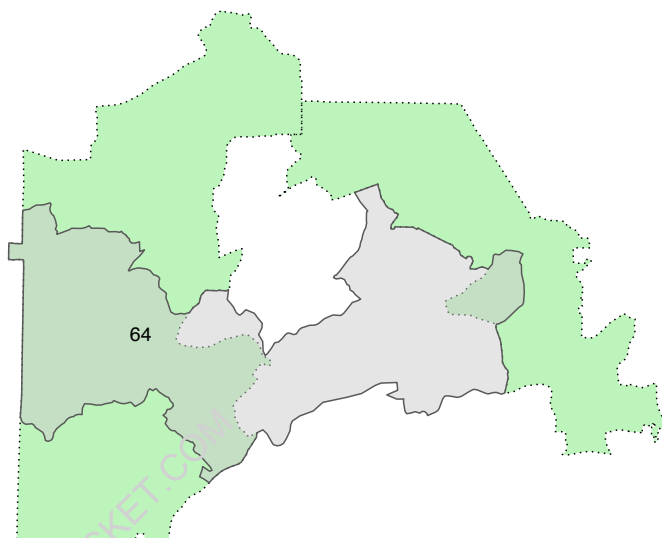
Figure 3: HD-64 in the Remedial Map (left) and the Cooper Proposed Remedial Map (right)

2023 Remedial HD-64 shown in grey
BVAP overlap: 32.5%



Note: House districts listed by the Court in ordering shown in green

2023 Cooper Remedial HD-64 shown in grey
BVAP overlap: 20.8%



Note: House districts listed by the Court in ordering shown in green

Table 11: Similarity between Remedial HD-64 and Illustrative Districts

Illustrative District	Shared Population	
	Total	BVAP
Remedial House District 64:		
Esselstyn HD-61	54.7%	52.2%
Esselstyn HD-64	15.4%	21.2 %
Esselstyn HD-66	29.9%	26.6 %
	100 %	100 %
Cooper HD-65	32.6%	39.4%
Cooper HD-61	15.4 %	21.2%
Cooper HD-64	18.9 %	11.3%
Cooper HD-66	33.2 %	28.0%
	100%	100%

Note: The majority of the population in HD-64 is contained in a majority-BVAP illustrative district in either the Cooper or Esselstyn illustrative maps. The district that contains the largest overlap is bolded in each illustrative map.

4.5 Remedial House District 74 and 117 - South-metro Atlanta

The Grant plaintiffs also critique House remedial districts 74 and 117 for extending outside of the 2021 House districts articulated on page 514 of the Court's October 26, 2023 order.¹¹ This critique is weak for two reasons. First, remedial HD-74's Black voting age population overlaps the court-defined area by upwards of 93%. Only 6.71% of the Black voting-age population reside outside the area. Second, while HD-117 overlaps by much less (34.1%), it is again the case that the plaintiffs' own proposed remedial map commits the same purported error. Mr. Cooper's proposed HD-117 likewise extends beyond the 2021 districts noted by the Court and contains similar population overlap (35.3%). If this were such a significant violation of the Court's direction, it would be unusual for the plaintiffs to violate this order themselves in their own proposed remedial map.¹²

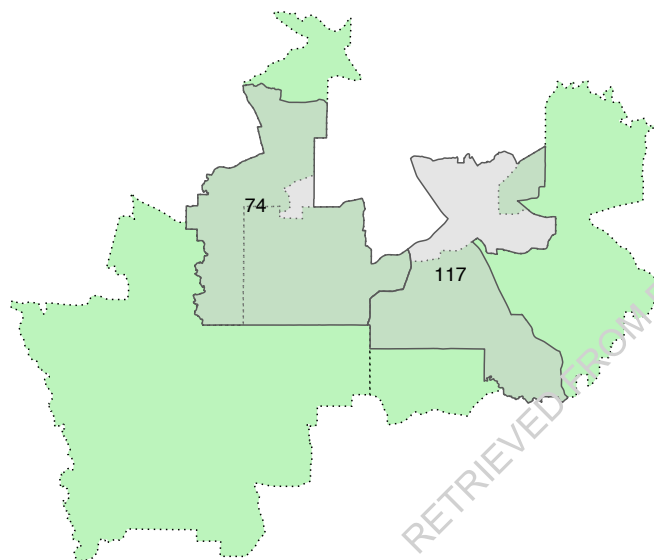
Furthermore, remedial HDs-74 and 117 are quite similar to majority-BVAP districts in the plaintiffs' illustrative maps. 81.8% of the Black voting-age population in remedial HD-74 is contained in a majority-BVAP illustrative district in the Cooper illustrative map (Cooper HD-74) and 70.2% of the Black voting-age population in remedial HD-117 is shared with illustrative HD-117 in the Esselstyn illustrative map. Table 12 shows how the population of remedial HDs-74 and 117 relate to the Cooper and Esselstyn illustrative House districts and the degree to which the district populations overlap. The illustrative district that contains the largest overlap with each remedial district is **bolded**.

¹¹See, for example, pages 9-12 of the Grant Plaintiffs' Objections to the Georgia General Assembly's Remedial State Legislative Plans. The court order specifically says: "SB 1EX violates Section 2 of the Voting Rights Act as to the following areas/districts: Enacted Senate Districts 10, 16, 17, 25, 28, 30, 34, 35, 43, and 44."

¹²It is again important to note that this is the proposed remedial map, not the original illustrative map. This is important because Mr. Cooper drew this map with the same information as the state legislature regarding the areas articulated by the Court regarding the particular location of Section 2 violations throughout the state.

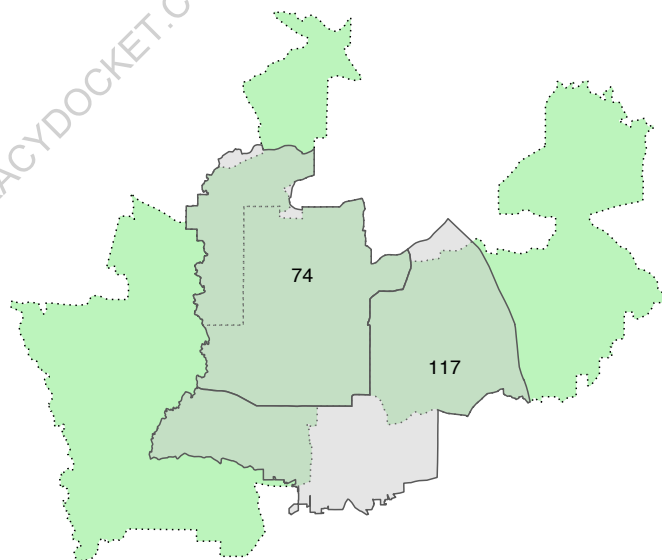
Figure 4: HDs-74 and 117 in the Remedial Map (left) and the Cooper Proposed Remedial Map (right)

2023 Remedial HDs-74 and 117 shown in grey
BVAP overlap: HD-74=93.3%, HD-117=34.1%



Note: House districts listed by the Court in ordering shown in green

2023 Cooper Remedial HDs-74 and 117 shown in grey
BVAP overlap: HD-74=87.3%, HD-117=35.4%



Note: House districts listed by the Court in ordering shown in green

Table 12: Similarity between Remedial HDs-74 and 117 and Illustrative Districts

	Shared Population	
Illustrative District	Total	BVAP
Remedial House District 74:		
Esselstyn HD-78	72.9%	69.5%
Esselstyn HD-74	14.8%	19.3%
Esselstyn HD-75	5.3%	4.4%
Esselstyn HD-116	7.0%	6.7%
	100%	100%
Cooper HD-74	80.8%	81.8%
Cooper HD-78	14.7%	14.2%
Cooper HD-116	4.5 %	4.1%
	100%	100%
Remedial House District 117:		
Esselstyn HD-117	69.2%	70.2%
Esselstyn HD-116	30.8%	29.8 %
	100%	100%
Cooper HD-115	60.2%	63.1%
Cooper HD-117	39.8 %	36.9%
	100%	100%

Note: The district that contains the largest overlap is bolded in each illustrative map. For example, 81.8% of the Black voting-age population in HD-74 is contained in the Cooper illustrative HD-74.

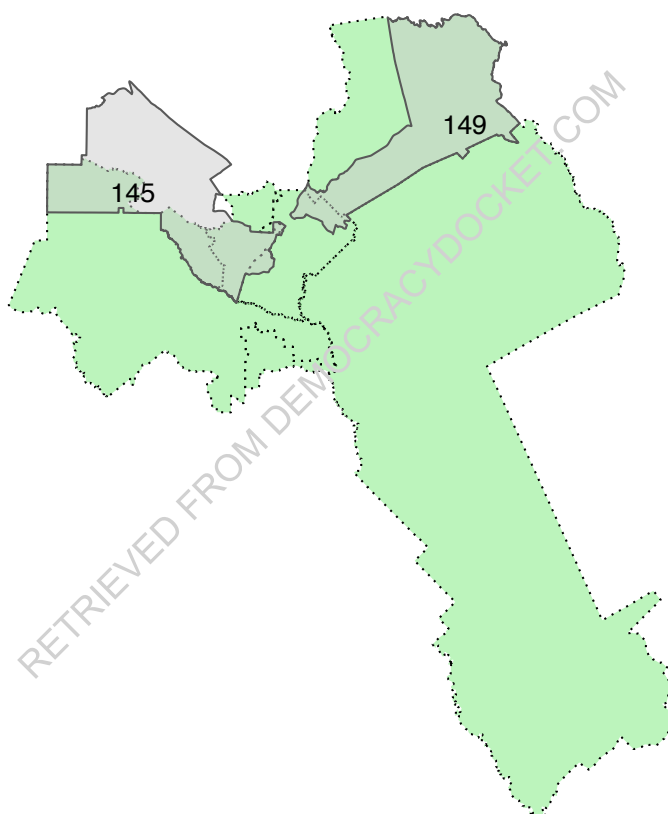
4.6 Remedial House District 145 and 149 - Macon-Bibb

The APA plaintiffs' appear to be content with House remedial House districts 145 and 149. In their objections brief they state: "The 2023 Proposed House Plan's lines in the Macon-Bibb area do appear to include Black voters from the vote-dilution area in new majority-Black districts in numbers comparable to the APA remedial plan" (footnote 4, pg. 21). There are no other references to these two remedial districts in their brief. And yet, the Grant plaintiffs raise objections to these districts, particularly HD-145. Regardless of whether or not the various plaintiffs agree with one another on whether or not the remedial map is problematic in this region, the districts comport with the Court's direction to create two additional majority-BVAP districts in the Macon-Bibb region.

The thrust of the Grant plaintiffs' objections in this region is similar to their objections in the other parts of the map, which is that the remedial districts extend beyond the specific boundaries of the 2021 House districts articulated by the Court. However, remedial HD-149 is entirely contained within this area and is therefore not subject to this critique at all. This leaves remedial HD-145 as the only district that any plaintiff offers any critique of in this region. However, 77.4% of remedial HD-145's Black voting age population overlaps the area noted in the Court's October order. As the APA plaintiffs' note, this is similar to the amount of overlap that Mr. Cooper's own proposed remedial map contains in this region. The substantial overlap between remedial HD-149 with the court-delineated area, combined with the fact that the other plaintiffs in the case find no fault with HD-145 at all is strong evidence that the district is indeed compliant with the court's orders.

Figure 5: HDs-145 and 149 in the Remedial Map

2023 Remedial HDs-145 and 149 shown in grey
BVAP overlap: HD-145=77.4%, HD-149=100%



Note: House districts listed by the Court in ordering shown in green

Remedial HDs-145 and 149 are quite similar to majority-BVAP districts in the plaintiffs' illustrative maps. 59.1% of the Black voting-age population in remedial HD-145 is contained in a majority-BVAP illustrative district in the Esselstyn illustrative map (Esselstyn HD-142) and 64.3% of the Black voting-age population in remedial HD-149 is shared with illustrative HD-149 in the Cooper illustrative map. Table 13 shows how the population of remedial HDs-142 and 149 relate to the Cooper and Esselstyn illustrative House maps and the degree to which the district populations overlap. The illustrative district that contains the largest overlap with each remedial district is bolded.

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Table 13: Similarity between Remedial HDs-145 and 149 and Illustrative Districts

Illustrative District	Shared Population	
	Total	BVAP
Remedial House District 145:		
Esselstyn HD-142	57.8%	59.1%
Esselstyn HD-133	13.8%	13.3%
Esselstyn HD-135	10.1%	3.3%
Esselstyn HD-145	11.7%	14.5%
Esselstyn HD-149	6.7%	9.7%
	100%	100%
Cooper HD-145	46.4%	41.3%
Cooper HD-135	22.3%	15.7%
Cooper HD-142	24.0%	31.9%
Cooper HD-143	7.3%	11.2%
	100%	100%
Remedial House District 149:		
Esselstyn HD-149	57.2%	64.3%
Esselstyn HD-133	33.7%	20.6%
Esselstyn HD-143	9.1%	15.1%
	100%	100%
Cooper HD-144	39.6%	21.8%
Cooper HD-133	38.1%	42.5%
Cooper HD-143	22.3%	35.7%
	100%	100%

Note: The majority of the population in remedial HDs-145 and 149 are contained in a majority-BVAP illustrative district in either the Cooper or Esselstyn illustrative maps. The district that contains the largest overlap is bolded in each illustrative map.

4.7 Electoral Effectiveness

All five of the newly created majority-BVAP House districts in the 2023 remedial House plan perform uniformly for Democratic candidates. To measure this I looked at the general election results of 15 statewide election contests from 2106-2022 in each of the districts. Table 14 shows the majority-BVAP and majority-minority VAP districts in both the 2021 enacted and 2023 remedial House maps. The table then shows the proportion of the 15 elections in which the Democratic candidate won a majority of the two-party votes cast in that district.¹³

There are 71 Democratic-leaning districts in Table 14 for the 2021 enacted House map. There are 74 Democratic-leaning districts in Table 14 for the 2023 remedial House map.¹⁴ All of the majority-BVAP districts in both the 2021 enacted and 2023 remedial House maps are solidly Democratic with the exception of HD-128, which leans Republican in both maps, but is nevertheless currently represented by a Black Democratic legislator. Of the 27 majority-minority districts in the 2021 enacted House map, 23 are Democratic-leaning. Of the 27 majority-minority districts in the 2023 remedial House map, 21 are Democratic-leaning.

¹³The specific elections considered are: 2022: Attorney General, Governor, Secretary of State, US Senate, Lt. Governor; 2021: US Senate Runoff, US Special Senate Runoff; 2020: US Special Senate, US Senate, President; 2018: Attorney General, Governor, Lt. Governor; 2016: President, US Senate.

¹⁴I define Democratic leaning as a district in which the Democratic candidate won at least 8 of the 15 elections considered.

Table 14: Reconstituted Election Results in House Districts

2021 Districts	% of elections where Democrat wins	Remedial Districts	% of elections where Democrat wins
38	100%	64	100%
39	100%	74	100%
55	100%	117	100%
58	100%	145	100%
59	100%	149	100%
60	100%	38	100%
61	100%	39	100%
62	100%	55	100%
63	100%	58	100%
65	100%	59	100%
66	100%	60	100%
67	100%	61	100%
68	100%	62	100%
69	100%	63	100%
75	100%	65	100%
76	100%	66	100%
77	100%	67	100%
78	100%	68	100%
79	100%	69	100%
84	100%	75	100%
85	100%	76	100%
86	100%	77	100%
87	100%	78	100%
88	100%	79	100%
89	100%	84	100%
90	100%	85	100%
91	100%	86	100%
92	100%	87	100%
93	100%	88	100%
94	100%	89	100%
95	100%	90	100%
113	100%	91	100%
115	93.3%	92	100%
116	100%	93	100%
126	100%	94	100%
128	26.7%	95	100%
129	100%	113	100%
130	100%	115	100%
132	100%	116	100%
137	100%	126	100%
140	100%	128	26.7%
141	100%	129	100%
142	100%	130	100%
143	100%	132	100%
150	93.3%	137	100%
153	100%	140	100%
154	73.3%	141	100%
165	100%	142	100%
177	66.7%	143	100%
4	0%	150	93.3%
29	0%	153	100%
37	93.3%	154	73.3%
41	100%	165	100%
42	100%	177	66.7%
43	93.3%	4	0%
50	86.7%	29	0%
56	100%	35	93.3%
80	93.3%	37	93.3%
81	100%	41	100%
83	93.3%	42	100%
96	100%	43	100%
97	100%	50	86.7%
98	100%	56	100%
99	40%	80	93.3%
101	86.7%	83	93.3%
102	100%	96	100%
105	86.7%	97	100%
106	86.7%	98	100%
107	100%	99	40%
108	73.3%	101	100%
109	100%	102	100%
110	93.3%	105	26.7%
151	0%	106	100%
162	100%	107	93.3%
163	100%	108	53.3%
168	100%	109	100%
		110	93.3%
		151	0%
		162	100%
		163	100%
		168	100%

Note: Performance is based on the percent of the two-party vote won by the Democratic candidate in the district for 15 statewide elections between 2016 and 2022. Yellow districts are majority-BVAP. Green districts are majority-minority VAP. Blue districts are newly created majority-BVAP districts in the remedial map.

I, Dr. Michael Barber, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, hereby declare that the foregoing is true and accurate to the best of my knowledge

A handwritten signature in black ink, appearing to read "Michael Barber", written in a cursive style.

Michael Barber

December 18, 2023

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CONTACT INFORMATION

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ACADEMIC APPOINTMENTS

Brigham Young University, Provo, UT

August 2020 - present Associate Professor, Department of Political Science
Jan 2023 - present Director, Center for the Study of Elections and Democracy
2014 - July 2020 Assistant Professor, Department of Political Science
2014 - Jan 2023 Faculty Scholar, Center for the Study of Elections and Democracy

EDUCATION

Princeton University Department of Politics, Princeton, NJ

Ph.D., Politics, July 2014

- Advisors: Brandice Canes-Wrone, Nolan McCarty, and Kosuke Imai
- Dissertation: "Buying Representation: the Incentives, Ideology, and Influence of Campaign Contributions on American Politics"
- 2015 Carl Albert Award for Best Dissertation, Legislative Studies Section, American Political Science Association (APSA)

M.A., Politics, December 2011

Brigham Young University, Provo, UT

B.A., International Relations - Political Economy Focus, April, 2008

- *Cum Laude*

RESEARCH INTERESTS

American politics, congressional polarization, political ideology, campaign finance, survey research

PUBLICATIONS

26. **"The Crucial Role of Race in 21st Century U.S. Political Realignment**, with Jeremy Pope
Forthcoming at *Public Opinion Quarterly*
25. **"Misclassification and Bias in Predictions of Individual Ethnicity from Administrative Records"**, with Lisa Argyle
Forthcoming at *American Political Science Review*
24. **"Partisanship and Trolleyology"**, with Ryan Davis
Forthcoming at *Research & Politics*
23. **"Does Issue Importance Attenuate Partisan Cue-Taking"**, with Jeremy Pope
Forthcoming at *Political Science Research and Methods*

22. **“A Revolution of Rights in American Founding Documents”**, with Scott Abramson and Jeremy Pope
Forthcoming at *Journal of Political Institutions and Political Economy*
21. **“Groups, Behaviors, and Issues as Cues of Partisan Attachments in the Public”**, with Jeremy Pope
Forthcoming at *American Politics Research*
20. **“Ideological Disagreement and Pre-emption in Municipal Policymaking”**, with Adam Dynes
American Journal of Political Science, no. 1 (2023): 119-136.
19. **“400 million voting records show profound racial and geographic disparities in voter turnout in the United States”**, with John Holbein
PloS One, 2022, Vol. 17, no. 6: e0268134
18. **“Comparing Campaign Finance and Vote Based Measures of Ideology”**
Journal of Politics, 2022. Vol. 84, no. 1 (2022): 613-619.
17. **“The Participatory and Partisan Impacts of Mandatory Vote-by-Mail”**, with John Holbein
Science Advances, 2020. Vol. 6, no. 35, DOI: 10.1126/sciadv.abc7685
16. **“Issue Politicization and Interest Group Campaign Contribution Strategies”**, with Mandi Eatough
Journal of Politics, 2020. Vol. 82: No. 3, pp. 1008-1025
15. **“Campaign Contributions and Donors’ Policy Agreement with Presidential Candidates”**, with Brandice Canes-Wrone and Sharece Thrower
Presidential Studies Quarterly, 2019. 49 (4) 770–797
14. **“Conservatism in the Era of Trump”**, with Jeremy Pope
Perspectives on Politics, 2019, 17 (3) 719–736
13. **“Legislative Constraints on Executive Unilateralism in Separation of Powers Systems”**, with Alex Bolton and Sharece Thrower
Legislative Studies Quarterly, 2019, 44 (3) 515–548
Awarded the Jewell-Loewenberg Award for best article in the area of subnational politics published in *Legislative Studies Quarterly* in 2019
12. **“Electoral Competitiveness and Legislative Productivity”**, with Soren Schmidt
American Politics Research, 2019, 47 (4) 683–708
11. **“Does Party Trump Ideology? Disentangling Party and Ideology in America”**, with Jeremy Pope
American Political Science Review, 2019, 113 (1) 38–54
10. **“The Evolution of National Constitutions”**, with Scott Abramson
Quarterly Journal of Political Science, 2019, 14 (1) 89–114
9. **“Who is Ideological? Measuring Ideological Responses to Policy Questions in the American Public”**, with Jeremy Pope
The Forum: A Journal of Applied Research in Contemporary Politics, 2018, 16 (1) 97–122
8. **“Status Quo Bias in Ballot Wording”**, with David Gordon, Ryan Hill, and Joe Price
The Journal of Experimental Political Science, 2017, 4 (2) 151–160.
7. **“Ideologically Sophisticated Donors: Which Candidates Do Individual Contributors Finance?”**, with Brandice Canes-Wrone and Sharece Thrower
American Journal of Political Science, 2017, 61 (2) 271–288.
6. **“Gender Inequalities in Campaign Finance: A Regression Discontinuity Design”**, with Daniel Butler and Jessica Preece
Quarterly Journal of Political Science, 2016, Vol. 11, No. 2: 219–248.

5. **“Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate”**
Public Opinion Quarterly, 2016, 80: 225–249.
4. **“Donation Motivations: Testing Theories of Access and Ideology”**
Political Research Quarterly, 2016, 69 (1) 148–160.
3. **“Ideological Donors, Contribution Limits, and the Polarization of State Legislatures”**
Journal of Politics, 2016, 78 (1) 296–310.
2. **“Online Polls and Registration Based Sampling: A New Method for Pre-Election Polling”** with Quin Monson, Kelly Patterson and Chris Mann.
Political Analysis 2014, 22 (3) 321–335.
1. **“Causes and Consequences of Political Polarization”** In *Negotiating Agreement in Politics*. Jane Mansbridge and Cathie Jo Martin, eds., Washington, DC: American Political Science Association: 19–53. with Nolan McCarty. 2013.
 - Reprinted in *Solutions to Political Polarization in America*, Cambridge University Press. Nate Persily, eds. 2015
 - Reprinted in *Political Negotiation: A Handbook*, Brookings Institution Press. Jane Mansbridge and Cathie Jo Martin, eds. 2015

AVAILABLE
WORKING PAPERS

“Race and Realignment in American Politics”
with Jeremy Pope (Revise and Resubmit at *Public Opinion Quarterly*)

“The Policy Preferences of Donors and Voters”

“Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records.”
with Kosuke Imai

“Super PAC Contributions in Congressional Elections”

WORKS IN
PROGRESS

“Collaborative Study of Democracy and Politics”
with Brandice Canes-Wrone, Gregory Huber, and Joshua Clinton

“Preferences for Representational Styles in the American Public”
with Ryan Davis and Adam Dynes

INVITED
PRESENTATIONS

“Are Mormons Breaking Up with Republicanism? The Unique Political Behavior of Mormons in the 2016 Presidential Election”

- Ivy League LDS Student Association Conference - Princeton University, November 2018, Princeton, NJ

“Issue Politicization and Access-Oriented Giving: A Theory of PAC Contribution Behavior”

- Vanderbilt University, May 2017, Nashville, TN

“Lost in Issue Space? Measuring Levels of Ideology in the American Public”

- Yale University, April 2016, New Haven, CT

“The Incentives, Ideology, and Influence of Campaign Donors in American Politics”

- University of Oklahoma, April 2016, Norman, OK

“Lost in Issue Space? Measuring Levels of Ideology in the American Public”

- University of Wisconsin - Madison, February 2016, Madison, WI

“Polarization and Campaign Contributors: Motivations, Ideology, and Policy”

- Hewlett Foundation Conference on Lobbying and Campaign Finance, October 2014, Palo Alto, CA

“Ideological Donors, Contribution Limits, and the Polarization of State Legislatures”

- Bipartisan Policy Center Meeting on Party Polarization and Campaign Finance, September 2014, Washington, DC

“Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate”

- Yale Center for the Study of American Politics Conference, May 2014, New Haven, CT

CONFERENCE PRESENTATIONS

Washington D.C. Political Economy Conference (PECO):

- 2017 discussant

American Political Science Association (APSA) Annual Meeting:

- 2014 participant and discussant, 2015 participant, 2016 participant, 2017 participant, 2018 participant

Midwest Political Science Association (MPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2018 participant

Southern Political Science Association (SPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2017 participant

TEACHING EXPERIENCE

Poli 301: Data Visualization

- Summer 2022, Fall 2022

Poli 315: Congress and the Legislative Process

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017, Fall 2022

Poli 328: Quantitative Analysis

- Winter 2017, Fall 2017, Fall 2019, Winter 2020, Fall 2020, Winter 2021

Poli 410: Undergraduate Research Seminar in American Politics

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

AWARDS AND GRANTS

2019 BYU Mentored Environment Grant (MEG), American Ideology Project, \$30,000

2017 BYU Political Science Teacher of the Year Award

2017 BYU Mentored Environment Grant (MEG), Funding American Democracy Project, \$20,000

2016 BYU Political Science Department, Political Ideology and President Trump (with Jeremy Pope), \$7,500

2016 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Hayden Galloway, Jennica Peterson, Rebecca Shuel

2015 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Michael-Sean Covey, Hayden Galloway, Sean Stephenson

2015 BYU Student Experiential Learning Grant, American Founding Comparative Constitutions Project (with Jeremy Pope), \$9,000

2015 BYU Social Science College Research Grant, \$5,000

2014 BYU Political Science Department, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$3,000

2014 BYU Social Science College Award, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$3,000

2014 BYU Center for the Study of Elections and Democracy, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$2,000

2012 Princeton Center for the Study of Democratic Politics Dissertation Improvement Grant, \$5,000

2011 Princeton Mamdouha S. Bobst Center for Peace and Justice Dissertation Research Grant, \$5,000

2011 Princeton Political Economy Research Grant, \$1,500

OTHER SCHOLARLY ACTIVITIES

Expert Witness in Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida)

Expert Witness in Common Cause, et al., Plaintiffs, vs. Lewis, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina)

Expert Witness in Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida)

Expert Witness in Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina)

Expert Witness in Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia)

Expert Witness in Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensperger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia)

Expert Witness in Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE No. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division)

Expert Witness in League of Women Voters of Ohio, et al., Relators, v. Ohio Redistricting Commission, et al., Respondents. Case No. 2021-1193 (Supreme Court of Ohio)

Expert Witness in Regina Adams, et al., Relators, v. Governor Mike DeWine, et al., Respondents. Case No. 2021-1428 (Supreme Court of Ohio)

Expert Witness in Rebecca Harper, et al., Plaintiffs, v. Representative Destin Hall, et al., Defendants (Consolidated Case). Case No. 21 CVS 500085 (Wake County, North Carolina)

Expert Witness in Carter, et al., Petitioners, v. Degraffenreid et al., Respondents (Consolidated Case). Case No. 464 M.D. 2021 (Commonwealth Court of Pennsylvania)

Expert Witness in Harkenrider, et al., Petitioners, v. Hochel et al., Respondents. Case No. E2022-0116CV (State of New York Supreme Court: County of Steuben)

Expert Witness in Our City Action Buffalo, Inc., et al., v. Common Council of the City of Buffalo (State of New York Supreme Court: County of Erie)

Expert Witness in Citizens Project, et al., v. City of Colorado Springs, et al. Case No. 22-cv-1365-CNS-MDB (U.S. District Court for the District of Colorado)

Expert Witness in Dr. Dorothy Nairne, et al., Plaintiffs, v. R. Yle Ardoin, Defendant, CIVIL NO. 3:22-cv-00178 (U.S. District Court for the Middle District of Louisiana)

ADDITIONAL TRAINING

EITM 2012 at Princeton University - Participant and Graduate Student Coordinator

COMPUTER SKILLS

Statistical Programs: R, Stata, SPSS, parallel computing

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