

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiff,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs respectfully move for a preliminary injunction on the claim in their First Amended Complaint. Specifically, Plaintiffs explain in the accompanying Brief that they are likely to succeed on their claim that the May 7, 2026 congressional plan ("HB 7003") violates the Fourteenth and Fifteenth Amendments by intentional racial vote dilution against Black voters in the configuration of congressional districts. As Plaintiffs explain, they are irreparably harmed in the absence of injunctive relief and the balance of the equities and public interest favor an injunction. Plaintiffs request an expedited briefing schedule and a joint hearing with the plaintiffs in *Sherman v. Hargett*, Case No. 3:26-cv-00616,

which would promote judicial efficiency as many of the legal issues overlap and the relief sought is similar in nature.

Per L.R. 7.01(a)(1), Counsel for the Plaintiffs have conferred with opposing counsel, who oppose the relief requested in the motion.

CONCLUSION

For the foregoing reasons and as set forth in the accompanying brief and appendix, Plaintiffs' motion for a preliminary injunction should be granted.

Dated: June 9, 2026

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was filed on June 9, 2026. A true and correct copy of that filing was forwarded on the same day via the Court's CM/ECF system upon all counsel of record.

/s/ Jennifer Nwachukwu
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[Consolidated Case]

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY
INJUNCTION**

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I. INTRODUCTION

Memphis is the city with the largest Black population in the United States. Within Tennessee's congressional map, it anchors a district that has, for decades, aligned with virtually all of the redistricting criteria ordinarily given deference by courts. Congressional District 9 is geographically compact; it is home to a community of interest; it respects geographical boundaries and more. Days after the Supreme Court's decision in *Callais v. Louisiana*, state lawmakers embarked down a path that was opaque, shrouded in secrecy and racially charged. That path led to a less than 48-hour state legislative session that achieved one goal – dismantling the state's only majority Black congressional district that had been in place for decades.

Despite the Legislature's thinly veiled claims that it targeted Congressional District 9 for partisan reasons only, the evidence makes clear that the legislature was not blind to the fact that they were intentionally cracking the Black population of Memphis and Shelby County into three different sections. The evidence shows that the goal was to intentionally and purposefully target Black voters and deny them any and all ability to elect a candidate of their choice. These actions defy the 14th and 15th Amendments' prohibition on intentional racial discrimination. This Court should enjoin the use of this unconstitutional map in the 2026 Congressional election.

II. FACTUAL BACKGROUND

On May 5, 2026, the Tennessee General Assembly convened in extraordinary session to adopt a legislation ("HB 7003 or 2026 Plan") that eliminated Tennessee's only majority Black Congressional district, Congressional District 9 ("CD 9"). During truncated hearings and debate, lawmakers and witnesses demonstrated to the overwhelmingly white legislators that the map intentionally denied Black voters fair representation. Disregarding those objections, the Legislature enacted the new map less than 48 hours later.

CD 9 has been the only majority Black district in Tennessee since 1980. In the redistricting plan adopted after the 2020 Decennial Census. (“2022 Plan”), the Black Voting Age Population (“BVAP”) in CD 9 was 61.3 percent. That majority did not result from any remedial action or race-influence line drawing but rather reflected the natural distribution of the population in Memphis and Shelby County. For decades, more than half the State’s Black population has lived in Shelby County.

On April 29, 2026, the U.S. Supreme Court decided *Louisiana v. Callais*, overturning a congressional map for Louisiana that featured two majority-Black districts drawn as the result of litigation under Section 2 of the Voting Rights Act of 1965 (“VRA”). Two days after the decision, on May 1, 2026, Tennessee Governor Bill Lee issued a Proclamation calling a special session of the Legislature to “effectuate changes to the composition of Tennessee’s congressional District[s] and to facilitate 2026 congressional elections.” The Proclamation cited no dramatic shift in population since the 2020 Census that rendered the current map unrepresentative. It made no claim that CD 9 violated the constitution and cited no mandate under federal law. The sole predicate for redistricting was the just-issued *Callais* decision, which made it harder to challenge redistricting plans for discrimination.

Tennessee law has prohibited late-decade redistricting since 1972. *See* Tenn. Code. Ann. § 2-16-102 (“The districts may not be changed between apportionments.”); 1972 Tenn. Pub. Acts, ch. 740, § 1. Despite this ban, the General Assembly convened on May 5, 2026, to do just that.

The first order of business was to remove the ban on late-decade redistricting. *See* H.B. 7002, 114th Gen. Assemb., Extr. Sess. (Tenn. 2026) (enacted May 7, 2026).¹

The General Assembly then hurriedly pushed through a new map that eliminated Tennessee's sole Congressional district with a majority Black population. During a hasty, abbreviated hearing on the legislation, the Legislature permitted only three people to testify—U.S. Congressman Steve Cohen, who represents CD 9, Dr. Sekou Franklin, and Attorney Walter Bailey. They put the legislators on notice that the new map would intentionally discriminate against Black voters. Dr. Franklin, the Political Action Chair of the Tennessee State Conference of the NAACP, described the plan as an unprecedented attack on voting rights that would dismantle a cohesive majority-Black district and strip Black voters of meaningful political power. Dr. Franklin also requested, “if [race was] not a factor, then explain to us who actually drew the maps.” *Hearing Before the H. Cong. Redistricting Comm.*, 114th Gen. Assemb., 2d Extr. Sess., at 46:50 (Tenn. 2026) (statement of Dr. Sekou Franklin). The Legislature has not answered that request. In splitting the Black population of Shelby County between three districts with extraordinary precision, Congressman Cohen charged, “used race as a basis to divide” a community of interest. *Id.* at 27:45 (statement of Congressman Steve Cohen).

During debate, Black Representatives Jesse Chism and Torrey Harris of Memphis repeatedly asked Speaker Sexton and Rep. William Lamberth if they knew the racial composition of Memphis and Shelby County. Speaker Sexton refused to acknowledge the demographic makeup of the jurisdictions and claimed that no racial data, only political data, were used to reconfigure

¹ The NAACP immediately challenged the bill that repealed the ban, HB 7002, in a state court lawsuit in Davidson County Chancery Court. *See TN State Conf. of NAACP, et. al v. TN Gov., et al.*, Case No. 26-0591-II (May 26, 2026). That court found that, although the language of HB 7002 expressly provides: “Tennessee Code Annotated, Section 2-16-102, is amended by deleting the last sentence of the section,” which prohibits redistricting between apportionments, that somehow “a safer conclusion would be that the prohibition remains in effect as the general rule but that HB 7003 constituted a more specific statute that created an exception for 2026.” *Id.* at 21.

the districts. *See id.* at 1:27:27 (statement of Speaker Cameron Sexton). Other representatives echoed concerns that the new plan would eliminate Black electoral opportunity.

Despite being placed on notice and cautioned about the discriminatory targeting, the legislators made no substantive changes to the bill and referred it to the Finance, Ways, and Means Committee on the same day, May 6, 2026. That Committee took an hour to pass the maps, with only white members voting in favor. The bill then went to the Calendar and Rules Committee, which set it to go before the General Assembly the next day.

During the General Assembly’s consideration of the map, the only justification offered for splitting Memphis and Shelby County and dispersing communities of color among three districts was a purported need to follow “population and politics.” *Id.* at 1:21:35, 1:26:13, 1:27:27, 1:28:30, 1:36:14, 1:36:56, 1:39:59, 1:49:26 (statements of Speaker Cameron Sexton). A sponsor of the redistricting bill claimed on the Senate floor that the Census was the *only* data source used to draw the maps. *See House Floor Session: 2d Extraordinary Session, 3d Legislative Day, Tennessee General Assembly*, at 1:39:45–1:41:11 (2026) (statements of Rep. John Ray Clemmons and Rep. Jason Zachary). That claim conflicted with assertions that the Legislature sought only partisan advantage. Census data do not reveal partisan splits, though they do show racial breakdowns. Further, no legislator suggested during the debates that anyone had considered records showing party affiliation or election results.²

In addition, when asked basic questions about the map and how it was drawn, the sponsors were evasive and failed to provide meaningful answers. For instance, Senator Stevens reluctantly admitted that Memphis was split in three districts under the proposed map after refusing to answer this question earlier in the Judiciary Committee debate. And despite having attended law school in

² Indeed, Tennessee voters do not register to vote with a political party, and therefore, even had voter registration data been consulted, it would not have allowed lines to be drawn based on party affiliation.

Memphis, he claimed not to know whether CD 9 was a majority Black congressional district. *See Senate Session: 2d Extraordinary Session, 3d Extraordinary Day, Tennessee General Assembly*, at 1:50:42–1:51:19 (May 7, 2026) (statements of Speaker Randy McNally and Sen. John Stevens). When asked who drew the map, the sponsors provided evasive answers. These cagey, scripted responses and feigned ignorance supported a view that partisanship was merely a pretext for dismantling CD 9.

III. STANDARDS FOR A PRELIMINARY INJUNCTION

A preliminary injunction is warranted if the movant establishes that: (1) they are likely to succeed on the merits, (2) they are likely to suffer irreparable harm without a preliminary injunction, (3) the balance of the equities weighs in their favor, and (4) the grant of an injunction serves the public interest. *Fischer v. Thomas*, 78 F.4th 864, 868 (6th Cir. 2023). Plaintiffs meet this standard.

IV. ARGUMENT

A. Plaintiffs Are Likely to Succeed on the Merits.

Plaintiffs allege intentional vote dilution in violation of the Fourteenth and Fifteenth Amendments.³ The claim requires a showing that the redistricting legislation had “the purpose and effect of diluting the minority vote.” *Alexander v. South Carolina St. Conf. of the NAACP*, 602 U.S. 1, 39 (2024), quoting *Shaw v. Reno*, 509 U.S. 630, 649 (1993). Plaintiffs must—and do—overcome the presumption of legislative good faith for the claim of intentional discrimination. Plaintiffs need not show that discriminatory purpose was the “sole[]” or even a “primary” motive

³ Plaintiffs do not allege a claim under Section 2 and therefore *Callais* does not apply. The U.S. Supreme Court’s ruling granting a stay in *Allen v. Milligan*, 608 U.S. ____ (2026) does not suggest otherwise. The district court in that case found intentional discrimination based on the State’s “deliberate ‘repetition of discrimination previously adjudicated’” under Section 2 of the Voting Rights Act. Slip Op. at 2-3. The Court’s reference to *Callais* in *Allen* reflected the intertwining of the Section 2 and constitutional claims.

for the legislation. *Village of Arlington Heights v. Metropolitan Housing Dev. Corp.*, 429 U.S. 252, 265-66 (1977). Their burden is satisfied by a showing that the racial discrimination was a “motivating factor” behind the State’s action. *See Tenn. State Conf. of the NAACP v. Lee*, 746 F.Supp.3d 473, 504 (M.D. Tenn. 2024), citing *Arlington Heights*, 429 U.S. at 266.

“Eliminating racial discrimination means eliminating **all of it**.” *Students for Fair Admissions, Inc. v. President and Fellows of Harvard Coll.*, 600 U.S. 181, 206 (2023) (emphasis added). Consequently, unlike in a racial gerrymandering claim, to prove intentional vote dilution, plaintiffs need not show that race was the sole or predominant factor in the decision. Any consideration is unlawful. States cannot intentionally base their decisions on race, even if doing so also would advance partisan objectives. The Supreme Court repeatedly has warned against using race as a proxy for political characteristics. *See Alexander v. South Carolina State Conf. of the NAACP*, 602 U.S. 1, 7 n.1 (2024) (“A plaintiff can also establish racial predominance by showing that the legislature used ‘race as a proxy’ for ‘political interest[s].’”) (internal citations omitted); *N. Carolina St. Conf. of NAACP v. McCrory*, 831 F.3d 204, 222 (4th Cir. 2016) (“Using race as a proxy for party may be an effective way to win an election. But intentionally targeting a particular race's access to the franchise because its members vote for a particular party, in a predictable manner, constitutes discriminatory purpose.”); *Miller v. Johnson*, 515 U.S. 900, 914 (1995); *see also Cooper v. Harris*, 581 U.S. 285, 291, n. 1 (2017) (noting that strict scrutiny is warranted when “a legislature elevated race to the predominant criterion in order to advance other goals, including political ones”); *Perez v. Abbott*, 253 F.Supp.3d 864, 889 (W.D. Tex. 2017) (equality of opportunity under Section 2 “is lacking where the mapdrawers take steps to intentionally disadvantage Hispanic voters in the district, even if done to further political goals”).

The evidence establishes that HB 7003 intentionally discriminates based on race. Indeed, Tennessee's effort to redistrict exemplifies intentional discrimination. Mere hours after the U.S. Supreme Court rendered its decision in *Callais*, the State launched its redistricting campaign dismantling CD 9, which, for over 50 years, had had been anchored by Memphis and Shelby County and stood as the only majority Black congressional district in Tennessee. CD 9, moreover, had not been drawn as a remedial district under the VRA. It reflected the residential patterns of Memphis, the largest city in the country with a majority Black population.

Tennessee last redistricted as part of the usual decennial cycle after the 2020 Census. The 2022 plan emerging from the process included CD 9 as a majority Black district. Tennessee law has prohibited late-decade redistricting since 1972, and the State followed that law until May 2026. But when the Supreme Court issued the *Callais* decision on April 29, 2026, making it harder to prove discrimination in VRA § 2 redistricting cases, Governor Lee issued the proclamation for the extraordinary session a mere two days later. Four days later, the legislature was back in session. And fewer than 48 hours after that, the legislature had jettisoned the ban on late-decade redistricting and adopted new maps that wiped out the only majority-Black district.

These events standing alone practically announce an intent to discriminate and adopt a map that, in the eyes of the majority-white legislature, “look[s] like Tennessee.” The details of the plan confirm that intent. The cracking of Black voters in the Memphis/Shelby County area and the strategic dispersal of BVAP across CD 5, CD 8, and CD 9 demonstrate the pervasiveness of race in the redistricting process. With remarkable precision, the Legislature anchored the newly configured districts in Shelby County and extended them hundreds of miles to include rural white communities to meet its population requirements. False and evasive explanations of the process compounded the misconduct. Even fortified by the presumption of good faith, the State's

pretextual assertions of purely partisan intent cannot withstand the powerful evidence of racial intent.

The assessment of discriminatory intent does not stop with the markers manifest in the nature and timing of Tennessee’s redistricting plan. The court must conduct “a sensitive inquiry into such circumstantial and direct evidence of intent as may be available.” *Arlington Heights*, 429 U.S. at 266; *see also Flowers v. Mississippi*, 588 U.S. 284, 302 (2019) (intent can be inferred from all “relevant circumstances that bear upon the issue of racial discrimination”). Direct evidence includes “[o]utright admissions of impermissible racial motivation.” *Hunt v. Cromartie*, 526 U.S. 541, 553 (1999). Although such admissions are “infrequent,” *id.*, Plaintiffs have such evidence here. Senator Brent Taylor, who is white, said the quiet part out loud in an interview with National Public Radio: “I think it's better for the congressmen in these districts to actually represent the interests and values of Tennesseans . . . [a]nd that's much better accomplished in districts that look like Tennessee rather than just a simply large urban core district like the old district 9 was.”

As to circumstantial evidence, the Court in *Arlington Heights* itemized key factors showing racial bias, including discriminatory effect (“whether [the impact of official action] bears more heavily on one race than another”); historical background of the decision; specific sequence of events leading up to the challenged decision; departures from normal procedures; and statements by members. 429 U.S. at 267-68.

1. The Dismantling of CD 9 Disproportionately Harms Black and Other Voters of Color.

Plaintiffs challenge CD 9 in HB 7003, which targets and disadvantages Black voters in the Memphis/Shelby County area. Plaintiffs have provided documentary evidence, videos of the legislative proceedings, and multiple expert reports showing that the May 2026 redistricting plan intentionally deprives Black voters of the opportunity to elect candidates they prefer.

A demographic comparison of the 2022 and 2026 maps corroborates that race was a motivating factor in the 2026 redistricting. As Anthony E. Fairfax explains in his expert report, the State’s decision to carve Shelby County’s population into three congressional districts, rather than two, reveals the General Assembly’s racial motive. *See* Expert Report of Anthony E. Fairfax (“Fairfax Report”), Exhibit A, ¶¶ 86-92. Given the density of Shelby County’s BVAP, any two-district configuration of Shelby County using the same combined area as CD 8 and CD 9 under the 2022 Map would leave at least one congressional district (and possibly two) with a BVAP of at least 38.77 percent. *See id.* ¶¶ 41-46. Cracking Shelby County across three congressional districts stretching into rural central Tennessee, rather than two districts centered in western Tennessee, evinces an intent to reduce the BVAP in Shelby County to a level that all but guarantees that Black voters are denied an opportunity to elect candidates of their choice. *See id.* ¶¶ 40-49. Indeed, the only other county in the State that is divided into three separate congressional districts is Davidson County—the county with the second-largest BVAP in Tennessee after Shelby County. *See id.* ¶ 50.

Splitting Shelby County into three districts was hardly the only way in which the General Assembly abandoned traditional race-neutral districting criteria: the 2026 Map performs worse than the 2022 Map for virtually every traditional redistricting metric. The 2026 Map replaces compact districts with elongated ones, *see id.* ¶¶ 67-77 & tbl. 13, and splits more communities of interest and political subdivisions—most significantly, trisecting the state’s largest Black population center, *see id.* ¶¶ 50, 78-85 & tbl. 12. The empirical metrics confirm what a visual comparison of the maps lays bare that the General Assembly enacted the 2026 Map “as a purposeful device to minimize or cancel out the voting potential” of Black voters in Memphis and

Shelby County. *Alexander v. S.C. State Conf. of the NAACP*, 602 U.S. 1, 38 (2024) (quoting *Miller v. Johnson*, 515 U.S. 900, 911 (1995)).

Plaintiffs' expert Dr. Baodong Liu is a professor of Political Science at the University of Utah. Dr. Liu's research has focused on the relationship between election systems and the ability of minority voters to participate fully in the political process and to elect representatives of their choice. Dr. Liu's report showed that, under the May 2026 Map, Black voters in Memphis and Shelby County overwhelmingly vote for the same candidates. In the 2024 Presidential General Election, Vice President Harris, a Black candidate, ran against Donald Trump, a white candidate. In CD 9, 92.6% of Black voters cast a ballot for Vice President Harris, while just 15.8% of white voters did the same. Liu Decl., Exhibit B, at 3-4. In 2020, Marquita Bradshaw, a Black candidate, ran against a white candidate for U.S. Senate. In CD 9, 96.9% of Black voters cast a ballot for Bradshaw compared to just 13.5% of white voters. Liu. Decl. at 3. The percentages were similar in CD 8 and CD 5. *Id.*

Dr. Liu concluded that the tripartite division of Shelby County ensures that Black voters in the Memphis area are a minority constituency in each new district, disabling them from forming the electoral majority and electing a candidate of their choice, despite their cohesiveness as an electoral bloc.

The manner in which the 2026 Plan divides Memphis's and Shelby County's Black population cannot be explained by the State's purported partisan motives. Dr. Moon Duchin used an ensemble or simulation analysis to evaluate the role that race played in the design of the May 2026 map and to test the plausibility of the Legislature's claim that it drew the map to achieve partisan goals without considering race. This form of analysis produces random samples of thousands or millions of districting plans that follow specified rules and priorities. Duchin Decl.,

Exhibit C, at 3. Dr. Duchin’s use of a similar methodology was credited by the Supreme Court in *Milligan. Allen v. Milligan*, 599 U.S. 1, 34 n.7 (2023) (noting with approval that Dr. Duchin’s “randomized algorithms” found “plans with two majority-black districts in literally thousands of different ways.”).

In her analysis for this case, Dr. Duchin ran three sets of simulations to test how a cartographer could have achieved the partisan and racial composition of the May 2026 map. First, as a baseline, Dr. Duchin produced a set of “neutral” maps that followed traditional districting principles but did not target a particular racial composition of districts or a particular partisan outcome. Duchin Decl. at 4. In this analysis, the maps produced almost always (at least 88.8% of maps) included a majority-Black district by voting age population, even without any use of race as a redistricting criteria. Duchin Decl. at 4. Next, Dr. Duchin trained the algorithm to aim for maps in which Donald Trump would have received a 60% share of the two-party vote in the 2020 Presidential Election in all nine congressional districts (partisan-targeted simulated maps). Duchin Decl. at 4. In the final set of simulated maps, Dr. Duchin trained the algorithm to aim for an even split of the Black population across three districts that intersect in Shelby County (race-targeted simulated maps). Duchin Decl. at 4.

Dr. Duchin found that both the race-targeted and the partisan targeted methods produce congressional districting plans that closely approximate the partisan advantage in the 2026 Plan. Duchin Decl. at 5. However, only the race-targeted method approximated the racial demographics of the 2026 plan. The 2026 Plan has a near-even split of the Black population in the Southwest corner of the state— all three districts intersecting Shelby County have a BVAP exceeding 26.5%, but none hit 32%. Duchin Decl. at 5. Maps designed to target partisan advantage never produced BVAP shares like the 2026 Plan: in fact, in the one-million partisan-targeted simulated maps, CD-

5 never had a BVAP above 22.5%. In the three Shelby County-based districts (which, as in the 2026 Plan, are the three districts with the highest Black populations in the State) and the typical BVAP in the district with lowest Black population hovers around 17.2%—well below CD-5 in the 2026 Plan—while the two other districts have BVAPs exceeding 37%—substantially above CD-8 and CD-9 in the 2026 Plan. Duchin Decl. at 5.⁴ By contrast, in the one-million simulated maps that used race to draw the districts, the median BVAP in the third-highest district (CD-5) is 26.7% and the other two districts range from 29% to about 31% BVAP, a near-perfect match to the May 2026 map. Duchin Decl. at 5, 7.

Moreover, of these two approaches, to achieving partisan advantage, only the race-targeted approach could have been carried out using Census data alone. Duchin Decl. at 4. The Decennial Census contains a Redistricting Data File (known as the PL 94-171) that has very few data fields: it contains total population and voting age population, broken down by race and ethnicity. Census data does not contain any partisan or electoral data, so maps that targeted partisan performance based directly on partisan data could not be created from Census data alone, but would have required some other data source. Duchin Decl. at 4. However, the Legislators responsible for developing the May 2026 map stated that they consulted only Census data and disclaimed using any other data source.

Based on the simulation analysis and the legislators' claim to have used only Census data, Dr. Duchin concluded that the use of racial targets was much more likely than partisan targeting to produce three Shelby County based districts in which the Black voting age population is below 32%, as it is in the 2026 plan. Duchin Decl. at 4, 5.

⁴ Other attempts to approximate the racial demographics of the May 2026 plan using non-racial criteria also failed. Duchin Decl. at 5 n.4.

As noted, the Supreme Court’s direction that partisan gerrymandering is not justiciable does not apply to intentional vote dilution claims under the 14th and 15th Amendments, as compared to a claim of racial gerrymandering, which Plaintiffs here do not allege. The report of Dr. Traci Burch, a Professor of Political Science at Northwestern University and a Research Professor at the American Bar Foundation, shows why such a requirement would be inappropriate and uninformative as to intentional discrimination. Burch Decl., Exhibit D, at 2.

Today, voting preferences in Tennessee cannot be explained by voters’ views on economic and social issues—so called “nonracial issues.” In fact, polarization levels in the electorate with respect to “nonracial” issues are increasingly shaped by racial attitudes. Burch Decl. at 16-76. Because in Tennessee the voting patterns are racially polarized and racial attitudes drive electoral outcomes and legislative actions, a professed claim to harm Democrats cannot and does not neutralize evidence of a motivation to harm Black voters.

2. Tennessee’s History of Discrimination Supports a Finding of Intentional Discrimination.

The second *Arlington Heights* factor is the historical background of the decision. Since the American Civil War, Black Memphians faced institutional barriers to exercising the franchise and building political power. See McKinney Decl., Exhibit E, at 4-5. Western Tennessee has a documented history of official discrimination in voting. See *Rural West Tenn. African-American Affairs Council v. Sundquist*, 209 F.3d 835, 843 n. 1 (6th Cir. 2000) (finding no error in the district court’s determination of a history of official discrimination in voting in western Tennessee). Courts have made similar findings in other parts of the state. See, e.g., *Cousin v. McWherter*, 46 F.3d 568, 571 n.3 (6th Cir. 1995) (noting the comprehensive trial court record establishing the “long history of the past and present discrimination African-Americans have faced in Hamilton County.”).

This history extends to incidents “reasonably contemporaneous with the challenged decision.” *McCleskey v. Kemp*, 481 U.S. 279, 298 n.20 (1987). The Tennessee Legislature has repeatedly sought to override the choices made by Black Memphians, undermine their elected officials, and take over local government functions. Am. Compl. ¶¶ 166-171. As recently as the 2026 regular session, legislators authorized the takeover of the predominantly Black Memphis-Shelby County school board and the auditing of the Shelby County District Attorney’s Office, as well as the potential replacement of the Shelby County District Attorney. *Id.* at ¶¶ 173-174. The 2026 redistricting is merely the latest of recent efforts to disenfranchise and silence Black voices in Shelby County, to erode self-government in that community, and to denigrate their political choices.

This disdain for the autonomy of Memphis and Shelby County voters occurred against the backdrop of a long history of racial segregation and subordination that continues to the present day. McKinney Decl. at 37. Tennessee has the second highest rate of disenfranchisement in the country, and while Black Tennesseans constitute approximately 17% of the state’s population, they also are 43% of all system-impacted individuals disenfranchised for felony convictions. *Id.* at 34. Black voters in Fayette County challenged its dilutive county commissioner map, resulting in a new map with three majority-minority districts after four years of litigation. *Id.* at 36.

The history of discrimination, extending to the present, supports the showing of discriminatory intent.

3. The Sequence of Events and Contemporaneous Statements from Decisionmakers Support an Inference of Intentional Discrimination.

The third and fourth *Arlington Heights* factors are the “specific sequence of events leading up to the challenged decision” and “contemporary statements by members of the decisionmaking body[.]” *Village of Arlington Heights*, 429 U.S. at 267–68.

The statements by the legislative sponsors and supporters of the 2026 redistricting reveal a clear strategy whenever race was invoked: deny any use of drawing the map and then deny any knowledge of the demographics of the state, no matter how implausible. For instance, Senator Stevens claimed that the map “removed racial data from the mapping process entirely,” but professed not to whether Memphis, where he attended law school, was majority Black or whether CD 9 was the only majority-Black congressional district. Burch Decl. at 9. Speaker Sexton too denied knowledge of the racial demographics of CD 9. Burch Decl. at 9. Representative Lamberth denied knowing whether Memphis, Shelby County, or CD 9 were predominantly Black. Burch Decl. at 9–10. These assertions strain credulity. Sponsors claimed instead that the mapdrawers used “census data” to draw the map, apparently unaware that although the Census includes breakdowns of race, it contains no data on voting patterns or political parties. Burch Decl. at 10.

In the face of these implausible, scripted answers, opposing lawmakers expressed skepticism regarding these professions of a race-blind process. Senator Yarboro pointed out that the map treated Democrats differently based on race, splitting 75% of Black Democrats into two non-compact congressional districts while uniting 75% of white Democrats into one compact congressional district. Burch Decl. at 11. He asserted that this different racial treatment resulted in white Democrats having better representation than Black Democrats because Black Democrats would be “racially and geographically isolated from power.” Burch Decl. at 11.

If there were any doubt about the falsity of the self-serving denials of racial motivation, the statement of Senator Taylor would dispel it. He opined that “it’s better for the congressmen in these districts to actually represent the interests and values of Tennesseans,” which can be “much better accomplished in districts that *look like* Tennessee.” Burch Decl. at 11 (emphasis added).

The residents of old CD 9, to Senator Taylor, were the “urban core[,]” who apparently did not qualify as “Tennesseans” worthy of representation.

4. Procedural and Substantive Departures Support a Finding of Intentional Discrimination.

The fifth *Arlington Heights* factor, which concerns departures from normal procedures in enacting the challenged law weighs heavily in favor of Plaintiffs. The process the General Assembly employed to produce and pass the 2026 plan departed significantly from previous redistricting efforts in many important ways. First, the General Assembly’s decision to redistrict late-decade was itself a substantial departure from the process it has followed for decades. Burch Decl. at 6. Prior to 2026, Tennessee had not engaged in redistricting between appointments for at least 50 years. In fact, Tennessee law banned such late-decade redistricting. Burch Decl. at 6. The legislature hurriedly passed HB 7002, removing the ban.

Second, compared to previous redistricting efforts, this process was rushed with minimal public transparency on the map-drawing process or the maps themselves. In 2022, legislators publicized the proposed congressional maps to the public 12 days before the map was enacted. Burch Decl. at 6. In 2012, legislators publicized the maps seven days before enactment. Burch Decl. at 6. In May 2026, the General Assembly passed the redistricting plan just one day after publicizing the maps. Burch Decl. at 5–6.

The rushed and secretive process of producing maps made it nearly impossible for legislators to submit amendments, alternative plans, or other feedback on the map. For instance, the House Redistricting Committee met only four hours after the proposed maps were made available to the public. Burch Decl. at 6–7. The House Rules Committee rejected proposals by Black legislators. Burch Decl. at 6–7.

In the House, the proposed map was scheduled for a floor vote just twenty-four hours after being available to the public. Burch Decl. at 7. The House Rules Committee also set the deadline for amendments at 24 hours before the House vote on the bill, rejecting a proposal by Representative Jones to permit filing amendments up to one hour before the vote. Burch Decl. at 5–7. Burch Decl. at 7. Representative Jones pointed out the absurdity of this deadline by saying “there was no way to file timely considered amendments because we were rushed through this process in less than 24 hours, given less than 24 hours to consider this map.” Burch Decl. at 7.

In addition, the General Assembly disregarded most traditional redistricting criteria, another significant departure from previous redistricting cycles. Burch Decl. at 8. For example, prior maps sought to avoid splitting cities between districts and considered whether the districts were compact. For the 2026 map, Speaker Sexton stated that the mapdrawers did not examine the boundaries of cities, and he refused to say whether compactness was considered. Burch Decl. at 8

B. Plaintiffs are Likely to Suffer Immediate and Irreparable Harm

The Constitution guarantees equal protection of the law and freedom from intentional discrimination in voting. *See* U.S. Const. amend. 14 § 1, 15 § 1. Defendants violated the constitutional rights of Black and other voters of color by dismantling CD 9 and intentionally denying them an equal opportunity to participate in the political process and elect their preferred candidates. “[T]he loss of constitutional freedoms ‘for even minimal periods of time ... unquestionably constitutes irreparable injury.’” *Elrod v. Burns*, 427 U.S. 347, 373 (1976); *see also Overstreet v. Lexington-Fayette Urban County Government*, 305 F.3d 566, 578 (6th Cir. 2023) (“violation of the plaintiff’s constitutional rights” constitutes irreparable harm). If Plaintiffs cannot participate equally in the upcoming election, “there can be no do-over and no redress” after the election occurs. *See League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th

Cir. 2014). The injury is not only irreparable, but absent intervention from this Court, will continue, as Plaintiffs will be forced to vote under a map designed to dilute their votes and deny them fair representation in Tennessee. *See* Sterling Decl. at ¶ 12; Sweet-Love Decl. at ¶¶ 14-16; Gould Decl. at ¶¶ 11-14; Harrington Decl. at ¶¶ 4-15; Terry Decl. at ¶ 7; Hutchinson Decl. at ¶ 8; Thomas Decl. at ¶ 9; Mitchell Decl. at ¶¶ 7-9; Sharpe Decl. at ¶ 10; Carson Decl. at ¶¶ 17, 21; Randolph Decl. at ¶¶ 11-16, Exhibits F-P, respectively.

C. The Balance of the Equities and the Public Interest Both Weigh in Plaintiffs' Favor.

Courts assess the balance of the equities and the public interest together because they “overlap considerably.” *Nken v. Holder*, 556 U.S. 418, 435 (2009). With interlocutory stays, “[t]hese factors merge when the Government is the opposing party.” *Id.* The serious harms inflicted by redistricting plans that unconstitutionally discriminate based on race outweigh any interest Defendants might assert as to administrative convenience or other burdens they may face. “Proper application of the Constitution, moreover, serves the public interest...as ‘it is always in the public interest to prevent the violation of a party’s constitutional rights.’” *Dahl v. Bd. of Trustees of Western Mich. Univ.*, 15 F.4th 728, 736 (6th Cir. 2021), quoting *G & V Lounge, Inc. v. Mich. Liquor Control Comm’n*, 23 F.3d 1071, 1079 (6th Cir. 1994). Both the balance of the equities and public interest weigh in favor of a preliminary injunction.

In *Purcell v. Gonzales*, 549 U.S. 1 (2004) (per curiam), after all, the Court applied an equitable doctrine reflecting the understandable reticence of courts to displace a state’s electoral plans at the last minute. Equitable doctrines are subject to equitable defenses designed to prevent litigants from gaming the judicial system.⁵ The finding that a state has acted with discriminatory

⁵ *Allen v. Milligan*, 608 U.S. ____ (2026), is consistent with this point. The State in *Milligan* sought to reinstate a longstanding redistricting plan. It did not create a new one on the eve of primary elections to discriminate against Black voters while evading any possible review, as Tennessee has done here.

intent necessarily means that the state has not acted in good faith. The Court explained in *Precision Instrument Mfg. Co. v. Automotive Maintenance Machinery Co.* that the maxim “He who comes into Equity must come with clean hands” is “far more than a mere banality That doctrine is rooted in the historical concept of the court of equity as a vehicle for affirmatively enforcing the requirements of conscience and good faith.” 324 U.S. 806, 814–15 (1945). *Purcell* cannot become a reverse statute of limitations, immunizing the State to perpetrate the most egregious discrimination so long as it does so sufficiently close to the election. Otherwise, a state could create a map on the eve of an election excising Black voters from any district, and courts would be powerless to stop it.

V. CONCLUSION

For these reasons, the Court should preliminarily enjoin the 2026 map.

Submitted: June 9, 2026.

Respectfully submitted,

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*Admitted *pro hac vice*

***Pro hac vice* motions to be filed

*** *Pro hac vice* motion pending

CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was filed on June 9, 2026. A true and correct copy of that filing was forwarded on the same day via the Court's CM/ECF system on all counsel of record.

/s/ Jennifer Nwachukwu
Jennifer Nwachukwu

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiff,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

DECLARATION OF ANTHONY E. FAIRFAX

I, Anthony E. Fairfax, declare as follows:

1. I am a demographic and mapping consultant and the CEO/Principal Consultant of CensusChannel LLC.
2. I have been retained by counsel representing the plaintiffs in this lawsuit to analyze the differences in the 2022 redistricting plan and the 2026 redistricting plan for Tennessee's congressional districts and to determine whether race was a motivating factor in the construction of the 2026 redistricting plan.

3. Attached hereto as Exhibit A is a true and correct copy of my Expert Report dated June 8, 2026, and the appendices attached thereto.
4. The findings and conclusions in my Expert Report are based upon information that has been made available to me or known by me to date.
5. I reserve the right to modify, update, or supplement the report and analyses as additional information is made available to me.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: 6/8/26



Anthony E. Fairfax

**Expert Report of Anthony E. Fairfax
on the
Analysis of Tennessee Congressional Districts
June 8, 2026**

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I. Introduction

1. I have been retained by counsel for the plaintiffs in this lawsuit to analyze the differences between the 2022 redistricting plan (“2022 Plan”) and the 2026 redistricting plan (“2026 Plan”) for the Tennessee congressional districts and to determine whether race was a motivating factor in the construction of the 2026 Plan.

II. Qualifications

2. I received a Bachelor of Science degree in Electrical Engineering (BSEE) from Virginia Tech in 1982 and a Master of Geospatial Information Science and Technology (MGIST) degree from North Carolina State University in 2016.
3. Currently, I am a demographic and mapping consultant and the CEO/Principal Consultant of CensusChannel LLC. Over the past 30 years, as a redistricting consultant, I have developed nearly 1,000 redistricting plans across the last four decennial redistricting cycles. I have drawn plans for jurisdictions of all sizes, from statewide plans to those for small municipalities. Throughout my career, I have also drawn and analyzed plans for jurisdictions across multiple states. In addition, during that timeframe, I have provided consulting services to numerous nonprofit and public-sector groups focused on redistricting plan development, analysis, and training.
4. In 2023, I was hired to develop an expert report and an illustrative plan for the plaintiffs in the *North Carolina State Conference of the NAACP v Berger* vote dilution case. Efforts included deposition and testimony. Also, I was hired to work on *Finn v. Cobb County Board of Elections*, a racial gerrymandering school board redistricting case in Cobb County, Georgia.
5. In 2023, I was hired by plaintiffs in *Addoh-Kondi v. Jefferson County Commission*, No. 2:23-cv-00503 (N.D. Ala.). My involvement in that effort included an expert report and testimony.

6. In 2022, I was hired by the plaintiffs in *Alabama NAACP v. Allen*, No. 2:21-cv-01531 (N.D. Ala.). I developed illustrative plans and provided deposition and testimony in the state senate redistricting vote dilution court case for the state of Alabama.
7. In 2022, I was hired by the U.S. Department of Justice in *Petteway et al. v. Galveston County*, No. 23-40582 (5th Cir. 2024). I developed an illustrative plan and an associated expert report for the Galveston, TX, vote dilution case.
8. In 2021, I was hired by plaintiffs to develop an Illustrative redistricting plan in the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment*, No. 4:21-cv-01239 (E.D. Ark.). My involvement in that effort included plan development, an expert report, a rebuttal report, and testimony.
9. Prior to this round of redistricting, I was hired by plaintiffs to develop Illustrative redistricting plans, associated expert reports, depositions, and provide testimony in *Holloway v. City of Virginia Beach*, No. 2:18-cv-00069 (E.D. Va.).
10. Also, in 1999, I was hired by the city of Everett, Washington, to perform the duties of Districting Master. I was tasked with assisting the city's Redistricting Commission with developing its first districting plan. The city moved from a seven-member at-large voting system to a system with five single-member districts and two members elected at-large. As Districting Master, I shepherded the commission through the entire plan development process as they successfully developed the city's districting system.
11. In addition to the litigation noted above in Arkansas, Louisiana, and Virginia, I have testified and provided depositions as a redistricting expert in Alabama, North Carolina, and Texas. My testimony focused on demographic and mapping analysis in federal and state court cases. These included: *Covington v. North Carolina* (North Carolina), *NC NAACP v. State of North Carolina* (North Carolina), *Wright v. North Carolina* (North Carolina), *Alabama State Legislative Caucus v. Alabama* (Alabama), *Perez v. Perry* (Texas), and *Perez v. Abbott* (Texas). Finally, I have been qualified as an expert in all of the cases in which I have testified.

12. My redistricting and geographic information system (GIS) experience and detailed work as an expert are contained within my attached resume (see Appendix A). I am being compensated at a rate of \$180 per hour for my work on this case.

III. Software, Data, and Technical Process Utilized

13. The software used in the analysis was Maptitude for Redistricting (“Maptitude”) by Caliper Corporation. Maptitude for Redistricting is one of the leading redistricting software applications utilized by consultants, major nonprofit groups, and governmental entities.¹ The company provides Census 2020 (“PL94-171”) and map data for Tennessee, which were used during the analysis.

14. Several datasets were acquired and utilized during this effort:

- a) The 2020 census data for the total population were obtained from Caliper Corporation’s datasets for Tennessee.²
- b) To evaluate district configurations, geographic boundaries for the 2022 and 2026 Tennessee congressional district block equivalency files and shapefiles were obtained from the Redistricting Data Hub (RDH).³ I also downloaded the most recent citizenship data from RDH, including the 2024 5-Year American Community Survey (ACS) Citizen Voting Age Population (CVAP) dataset at the block level for Tennessee. To review the CVAP data at various geographic levels for the 2022 and 2026 Plans, I used Maptitude for Redistricting’s aggregation process. Once the aggregation process was completed, estimated CVAP data were available for review at the district level (as well as other Census levels).

¹ See <https://www.caliper.com/mtrnews/clients.htm> for Maptitude for Redistricting’s client list.

² Caliper Corporation provides 2020 Census Data (PL94-171 data) in a format readable for their software, Maptitude for Redistricting. The population data are identical to the data provided by the Census Bureau.

³ The Redistricting Data Hub is a non-partisan project of the Fair Representation in Redistricting Initiative and operates as an independent and autonomous project, overseen by the Fair Representation in Redistricting advisory committee. It aggregates various Census data into a readily available, downloadable format via a central website. See <https://www.redistrictingdatahub.org>.

IV. Summary of Opinions

15. A summary of my findings, conclusions, and opinions includes the following:

- a) Shelby County, TN, with over 492,757 Black residents and 362,802 Black Voting Age Population (“BVAP”), accounts for over 41% of both the state's total Black population and BVAP. The city of Memphis, TN, with over 401,033 Black residents and 295,259 BVAP, accounts for approximately 34% of the state’s total Black population and BVAP.
- b) The 2022 Plan includes a majority-BVAP CD in the Shelby County area, with a BVAP of over 60%. The 2026 Plan includes three CDs originating in the Shelby County area; none of these CDs has a Black population exceeding 33%.
- c) The 2026 Plan divides the city of Memphis into three CDs: 5, 8, and 9. In the 2022 Plan, Memphis was divided into only two CDs, with 94.6% of the city in CD 9.
- d) In the 2022 Plan, Shelby County was divided into only two counties. The 2026 Plan divides Shelby County into three CDs, each with a significant share of the Black population. In the 2026 Plan, Shelby County has 161,617 Black residents in CD 5, 133,619 in CD 8, and 197,521 in CD 9. Ultimately, the 2026 Plan shifts almost 300,000 Black residents and over 200,000 BVAP from CD 9 to CDs 5 and 8.
- e) The 2026 Plan’s division of the three districts in Shelby County is strategically configured so that each CD is less than a third (33%) Black, has a BVAP ranging from approximately 27% to 31%, and maintains similar percentages across the three CDs. To achieve this parity, the population of each CD within the county was intentionally paired with a demographic population outside the county to maintain a relatively low and consistent Black population across the three CDs.
- f) The 2026 Plan’s traditional redistricting criteria metrics perform worse than those of the 2022 Plan, particularly in compactness and in minimizing political subdivision splits. Notably, the plan and district lower compactness were directly due to the additional CD split of Shelby County.
- g) Based on a variety of evidence, including: 1) the division of Shelby County’s Black population into three CDs; 2) the strategic carving out of Shelby County and the combining of district areas outside the county to keep overall district Black percentages relatively low; 3) the lower compactness performance due to the additional district added to Shelby County; and 4) the decreased performance on multiple redistricting criteria compared with the 2022 Plan, I conclude that race was a motivating factor in the configuration of the 2026 Plan.

V. Methodology

16. To determine whether race was a motivating factor during the plan development process, it is necessary to review and analyze changes in the racial population from the 2022 Plan to the 2026 Plan. The analysis I performed included a plan-wide comparison and a district-to-district comparison. The overall methods I used are presented below.
17. I reviewed relevant baseline demographic data for the state of Tennessee and its most populous county, Shelby County, using the 2020 Census and 2024 5-Year ACS CVAP Data. I also obtained the data needed to recreate the 2022 and 2026 Plans for Tennessee's Congressional districts. The plans were reconstructed using the Maptitude application and the block equivalency file and shapefile obtained from RDH.
18. The analysis focused on the states' largest race/ethnicity ("racial") groups—White Not Hispanic or Latino Alone⁴ ("White") and the Any Parts Black or African American ("Black")—using the 2020 decennial census. When using the ACS, Black or African Americans of a single race and those in combined race categories were aggregated. Populations were analyzed by reviewing the total population, voting age population ("VAP"), and Citizen Voting Age Population ("CVAP") for the state or county.⁵
19. The White population consists of those who selected White but not Hispanic or Latino on the decennial survey. The Black population consists of all persons who selected Black or African American on the decennial survey.⁶
20. Maptitude for Redistricting Core Constituencies reports provided much of the primary data used to analyze the population that shifted from the 2022 Plan to the 2026 Plan. The Core Constituencies reports compare the two plans and show how much of each district's population is retained and how much comes from another district's population. In addition to the total population, the reports present Black and White populations.

⁴ "Alone" denotes persons who selected a single race in the decennial census.

⁵ Citizen voting age population includes persons who are citizens above the age of 18 years. CVAP data is typically provided by the American Community Survey.

⁶ Because the field uses all persons who selected Black on the Census survey, there is a slight overlap of Hispanic Black persons included in the total. These persons will also be included in the Hispanic or Latino results.

21. The Core Constituencies reports were used to determine the population shift from the 2022 Plan to the 2026 Plan. I produced three reports: one for the entire state and two for the counties of Shelby and Davidson. The Shelby and Davidson County reports showed that population shifts occurred only within each county.
22. Maptitude of Redistricting also offers a feature that allows exporting the report to Microsoft Excel. Core Constituencies reports were generated in both PDF and Microsoft Excel formats (see Appendix E). In Maptitude, the 2026 Plan was opened alongside the 2022 Plan to compare population changes. Total population, White, and Black were selected as the population fields.
23. Once the Excel reports were generated, two modifications were made to both reports. First, the percentages for the two racial groups were adjusted to match the district's row total population. Second, additional row fields were added to calculate the population "moved to" and "moved from" each district. These spreadsheets were created for the total population and VAP.
24. Each of these reports provided the total population and the White and Black populations that were moved to and from each district. These amounts were determined for the total population and for VAP for White and Black persons.
25. Data tables and thematic maps depicting the percentage of the Black population were generated to provide a visual context for the Black population. These maps provide additional visual evidence of the district changes.
26. Redistricting criteria reports were generated and evaluated to compare the 2022 and 2026 Plans. This analysis assessed whether changes in the 2026 Plan improved or worsened performance on the criteria, taking into account the racial changes in the 2026 Plan. Finally, I analyzed the results from all the data products generated and developed my report, including my opinions and conclusions.

VI. Population and Demographics of Tennessee & Shelby County⁷

A. Tennessee – Total and Voting Age Population

27. According to the 2020 decennial census, Tennessee’s total population was 6,910,840 (see Table 1). The total White population in 2020 was 4,900,246 (70.91%), and the Black population was 1,196,114 (17.31%). The 2020 data also indicate that Tennessee’s voting-age population was 5,384,473 (see Table 1). The White voting-age population (“WVAP”) was 3,958,296 (73.51%), and the Black VAP (“BVAP”) was 864,737 (16.06%).

Table 1 – Tennessee Total & VAP by Race/Ethnicity (2020)				
Race/Ethnicity	Total		VAP	
	#	%	#	%
Total	6,910,840	100.00%	5,384,473	100.00%
Black	1,196,114	17.31%	864,737	16.06%
Latino	479,187	6.93%	305,717	5.68%
White	4,900,246	70.91%	3,958,296	73.51%
Amer Ind	15,539	0.22%	12,745	0.24%
Asian	134,302	1.94%	103,925	1.93%
Pac Islnd	3,594	0.05%	2,625	0.05%
Other	23,977	0.35%	15,557	0.29%

Note: Excluding Black, race categories are Not Hispanic Alone (Single Race). Black includes the aggregation of Black alone and combined-race categories, including Black Hispanics. Latino is Hispanic or Latino of all races. Rounding errors may exist in the table.

Source: U.S. Census Bureau PL94-171 data for 2020

B. Tennessee – Citizen Voting Age Population

28. Review of the 2024 5-Year ACS data for Tennessee shows that the Black CVAP (“BCVAP”) was 864,397 (16.4%), and the White CVAP (“WCVAP”) was 4,075,927 (77.3%) (see Table 2).

⁷ I also reviewed the Total Voting Age Population, CVAP, for Memphis, TN.

Table 2 – Tennessee CVAP by Race/Ethnicity (2024 5-Year ACS)		
Race/Ethnicity	#	%
Total CVAP	5,275,581	100.0%
Black CVAP	864,397	16.4%
Latino CVAP	185,705	3.5%
White CVAP	4,075,927	77.3%
Am Ind CVAP	5,361	0.1%
Asian CVAP	70,634	1.3%

Note: Race categories are Not Hispanic Alone (Single Race) except for Black. Latino is Hispanic or Latino of all races. Black CVAP includes Not Hispanic Black alone plus combined race aggregated. All data are aggregated from the block level 2024 5-Year ACS

Source: U.S. Census Bureau 2024 5-Year ACS data

C. Shelby County, TN – Total and Voting Age Population

29. According to the 2020 decennial census, Shelby County, TN’s total population was 929,744 (see Table 3). The total White population in 2020 was 316,740 (34.07%), while the Black population was over half of the total, at 492,757 (53.00%). According to the 2020 data, Shelby County’s voting-age population was 706,063 (see Table 3). The White voting-age population (“WVAP”) was 261,300 (37.01%), while the Black VAP (“BVAP”) was 362,802 (51.38%).

Table 3 – Shelby County, TN Total & VAP by Race/Ethnicity (2020)				
Race/Ethnicity	Total		VAP	
	#	%	#	%
Total	929,744	100.00%	706,063	100.00%
Black	492,757	53.00%	362,802	51.38%
Latino	77,707	8.36%	49,517	7.01%
White	316,740	34.07%	261,300	37.01%
Amer Ind	1,561	0.17%	1,201	0.17%
Asian	27,960	3.01%	21,687	3.07%

Note: Excluding Black, race categories are Not Hispanic Alone (Single Race). Black includes the aggregation of Black alone and combined-race categories, including Black Hispanics. Latino is Hispanic or Latino of all races. Rounding errors may exist in the table.

Source: U.S. Census Bureau PL94-171 data for 2020

30. Not only does Shelby County have the largest total population in Tennessee, but it also has the largest Black population of any county in the state. With over 492,757 Black residents and 362,802 BVAP, Shelby County accounts for over 41% of the state's total Black population and BVAP.

D. Shelby County, TN – Citizen Voting Age Population

31. Review of the 2024 5-Year ACS data for Tennessee shows that the Black CVAP (“BCVAP”) was 358,066 (55.44%), and the White CVAP (“WCVAP”) was 246,352 (38.14%) (see Table 4).

Table 4 – Shelby County, TN CVAP by Race/Ethnicity (2024 5-Year ACS)		
Race/Ethnicity	#	%
Total CVAP	645,863	100.00%
Black CVAP	358,066	55.44%
Latino CVAP	21,814	3.38%,
White CVAP	246,352	38.14%
Am Ind CVAP	445	0.07%
Asian CVAP	13,229	2.05%

Note: Race categories are Not Hispanic Alone (Single Race) except for Black. Latino is Hispanic or Latino of all races. Black CVAP includes Not Hispanic Black alone plus combined race aggregated together. All data are aggregated from the 2024 5-Year ACS to the county level
Source: U.S. Census Bureau 2024 5-Year ACS data

VII. The 2022 and 2026 Plan Demographics

A. 2022 Plan

32. Figure 1 shows a map of the congressional districts under the 2022 Plan. Notable districts include CDs 8 and 9 at the western end of the state. Notably, CDs 8 and 9 are relatively compact.

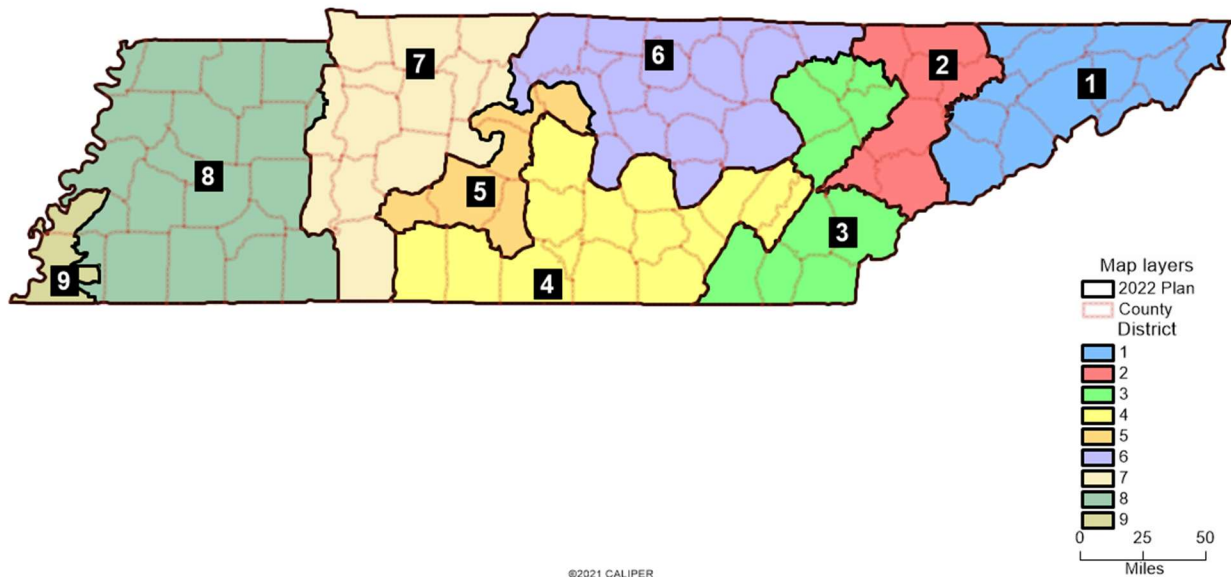


Figure 1 - Tennessee 2022 Congressional District Plan

33. The major racial demographics for the 2022 Plan are shown in Table 5. The 2022 Plan includes one majority-Black Congressional district, District 9. District 9 has a significantly higher percentage of Black residents than any other district in the state.

Table 5 - Tennessee Total Population of the 2022 Plan Districts					
District	Population	Black	%	White	%
1	767,871	24,950	3.25%	674,765	87.87%
2	767,871	55,734	7.26%	630,610	82.12%
3	767,871	88,094	11.47%	597,466	77.81%
4	767,872	84,304	10.98%	582,497	75.86%
5	767,871	102,908	13.40%	531,224	69.18%
6	767,871	79,753	10.39%	596,648	77.70%
7	767,871	138,302	18.01%	533,197	69.44%
8	767,871	144,048	18.76%	559,984	72.93%
9	767,871	478,021	62.25%	193,855	25.25%

Note: The White population is Not Hispanic Alone (Single Race) categories, while Black includes all persons who selected Black on the decennial survey. Rounding errors may exist in the table.

Source: U.S. Census Bureau 2020 Census Data, Maptitude Dataview

34. The VAP of the 2022 Plan shows similar demographic patterns (see Table 6). The 2022 Plan includes a single majority-BVAP Congressional district, District 9. As with the total population, District 9's BVAP% remains considerably higher than in the other districts, at 60.32%.

Table 6 - Tennessee VAP of the 2022 Plan Districts					
District	VAP	Black	%	White	%
1	616,550	16,903	2.74%	552,337	89.59%
2	609,503	38,404	6.30%	513,806	84.30%
3	607,013	63,672	10.49%	485,954	80.06%
4	587,445	57,907	9.86%	461,084	78.49%
5	582,505	73,823	12.67%	418,881	71.91%
6	603,423	56,693	9.40%	483,180	80.07%
7	597,796	99,724	16.68%	429,888	71.91%
8	597,005	105,799	17.72%	447,346	74.93%
9	583,233	351,812	60.32%	165,820	28.43%

Note: The White population is Not Hispanic Alone (Single Race) categories, while Black includes all persons who selected Black on the decennial survey. Rounding errors may exist in the table.

Source: U.S. Census Bureau 2020 Census Data, Maptitude Dataview

B. The 2026 Plan

35. Figure 2 shows a map of the congressional districts under the 2022 Plan. Notable districts to highlight include CDs 8 and 9 at the western end of the state. These two districts are now elongated and less compact. CD 5 also now extends into this western region of the state, including Shelby County.

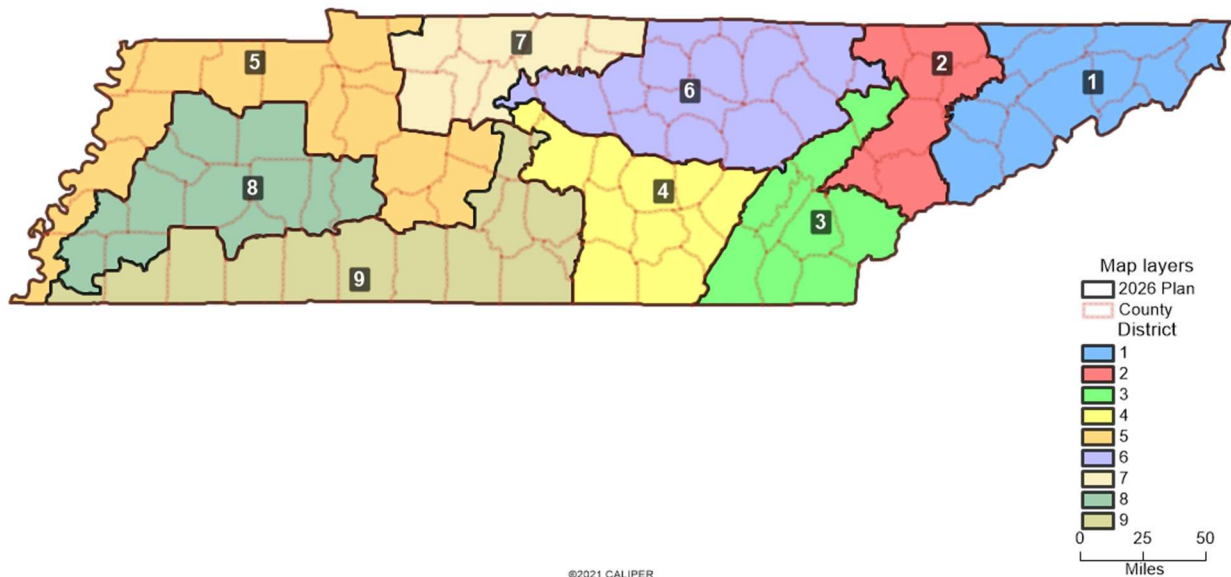


Figure 2 - Tennessee 2026 Congressional District Plan

36. The major racial demographics for the 2026 Plan are shown in Table 7. Unlike the 2022 Plan, the 2026 Plan has no majority-Black district. In addition, the Black and White percentages in some districts have been configured notably differently, specifically in CDs 5, 8, and 9.

Table 7 - Tennessee Total Population of the 2026 Plan Districts					
District	Population	Black	%	White	%
1	767,871	24,950	3.25%	674,765	87.87%
2	767,871	55,736	7.26%	630,609	82.12%
3	767,871	88,022	11.46%	595,695	77.58%
4	767,871	127,933	16.66%	492,688	64.16%
5	767,871	224,855	29.28%	470,378	61.26%
6	767,871	89,498	11.66%	590,253	76.87%
7	767,871	119,509	15.56%	556,416	72.46%
8	767,871	214,948	27.99%	460,793	60.01%
9	767,872	250,663	32.64%	428,649	55.82%

Note: The White population is Not Hispanic Alone (Single Race) categories, while Black includes all persons who selected Black on the decennial survey. Rounding errors may exist in the table.

Source: U.S. Census Bureau 2020 Census Data, Maptitude Dataview

37. In the 2026 Plan, the Black percentages for CD 5 and CD 8 increased from the 2022 Plan, rising from 13.40% to 29.28% and from 18.76% to 27.99%, respectively. However, CD 9 decreased from 62.25% to 32.64%. These three districts saw the largest percentage changes in the Black population, with CD 9 showing the greatest change.

38. The changes in VAP show similar shifts from the 2022 Plan to the 2026 Plan for the Black percentages in CDs 5, 8, and 9. In the 2026 Plan, the Black percentages in CDs 5 and 8 increased from the 2022 Plan, while the percentage in CD 9 decreased (see Table 8).

Table 8 - Tennessee VAP of the 2026 Plan Districts					
District	VAP	Black	%	White	%
1	616,550	16,903	2.74%	552,337	89.59%
2	609,512	38,406	6.30%	513,810	84.30%
3	606,482	63,327	10.44%	484,588	79.90%
4	586,518	91,453	15.59%	395,002	67.35%
5	586,652	163,517	27.87%	373,255	63.62%
6	614,497	65,220	10.61%	485,740	79.05%
7	593,732	85,320	14.37%	444,772	74.91%
8	590,123	156,789	26.57%	370,795	62.83%
9	580,407	183,802	31.67%	337,997	58.23%

Note: The White population is Not Hispanic Alone (Single Race) categories, while Black includes all persons who selected Black on the decennial survey. Rounding errors may exist in the table.

Source: U.S. Census Bureau 2020 Census Data, Maptitude Dataview

VIII. Analyzing for Racial Motivation

A. Introduction

39. To determine whether race was a motivating factor during the plan development process, I reviewed and analyzed population and configuration changes from the 2022 Plan to the 2026 Plan. The analysis included an overall plan review and a district-to-district comparison. I also analyzed shifts in the overall population and in racial populations added to and removed from the 2022 to the 2026 Plan districts, with a focus on Shelby County.

B. 2026 Plan of Shelby County is Divided into Three Districts due to Racial Motivation

40. One of the most significant changes from the 2022 Plan to the 2026 Plan is the shift in Shelby County from two districts in the 2022 Plan to three in the 2026 Plan. Figure 3 shows Shelby County under the 2022 Plan. Figure 4 presents the same Shelby County area, however, with the 2026 Plan boundaries. Not only does this additional split divide Shelby County's total population into three congressional districts, but it also divides, or "cracks," the county's substantial Black population. This extra division is the linchpin of racially motivated factors in the 2026 Plan.

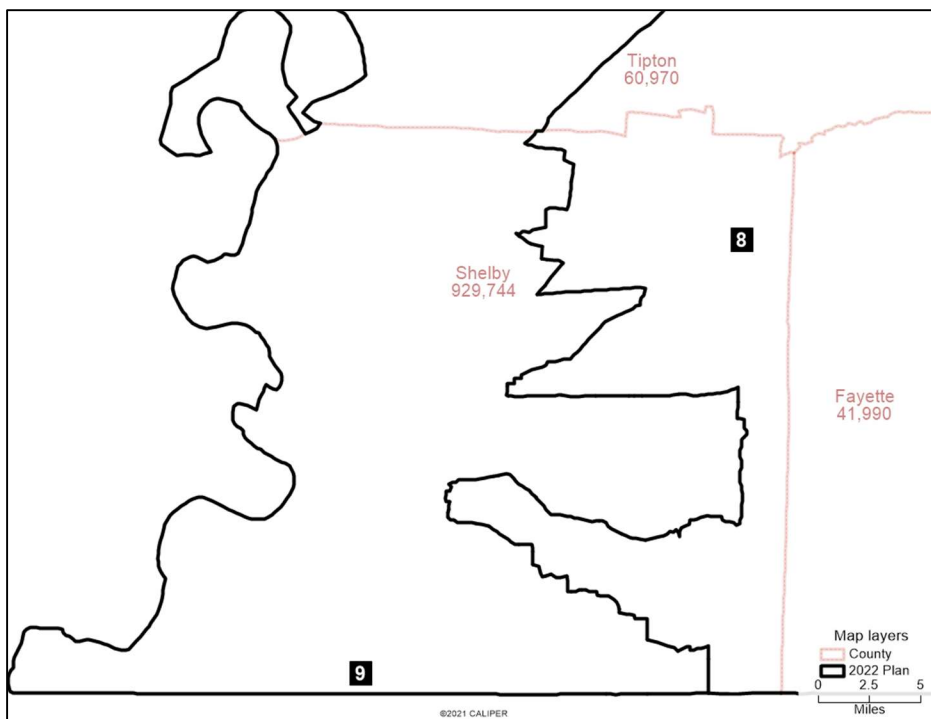


Figure 3 - Shelby County, TN 2022 Plan Zoom

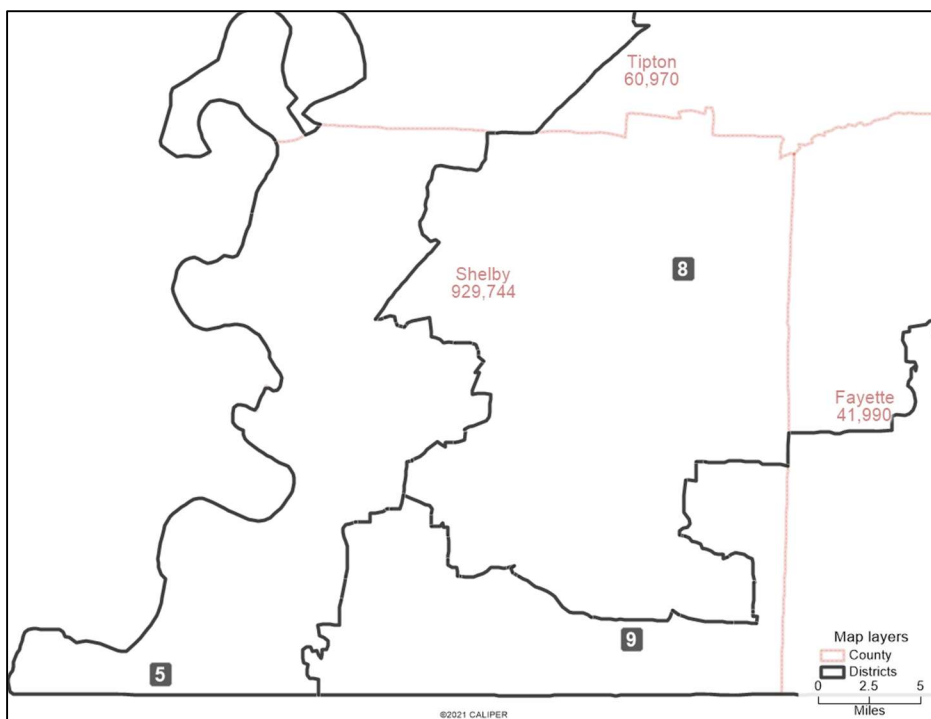


Figure 4 - Shelby County, TN 2026 Plan Zoom

41. The additional division of Shelby County divides the Black population across three CDs.

This is noteworthy because the Black population in Shelby County is large enough that any two-district configuration using the same regional footprint would leave one or both districts with a significant Black population.

42. Specifically, if the 2022 Plan's Shelby County Districts 8 and 9 were simply reconfigured within the same combined area, neither district would fall below 40.51% Black or 38.77% BVAP.

43. For instance, the 2022 Plan's CDs 8 and 9 contain 144,048 (18.76%) and 478,021 (62.25%) of the Black population, respectively, for a total of 622,069 (see Figure 5). Reconfiguring the districts within the same combined area would still yield 622,069 Black residents.

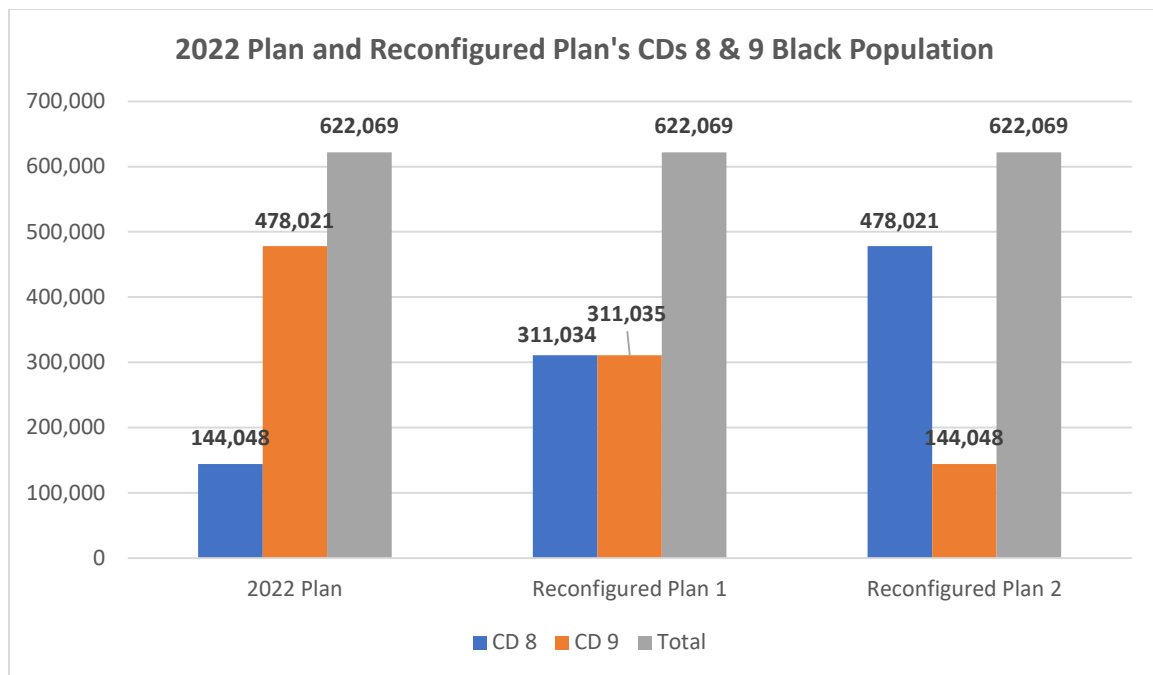


Figure 5 – 2022 Plan and Example Reconfigured Plan's CDs 8 & 9 Black Population

44. Figure 5 shows examples of how reconfiguring the two districts will result in at least one district with a Black population of at least 311,034. The graph shows the 2022 Plan, with CD 9 having a Black population exceeding 311,034 and CD 8 having a lower Black population. Reconfigure Plan 1 shows nearly equal Black populations between CDs 8 and 9. Reconfigure

Plan 2 shows the reverse of the 2022 Plan, with CD 8 having a Black population greater than 311,034 and CD 9 having a lower Black population. In fact, any configuration of CDs 8 and 9 that fits within the same footprint as the 2022 Plan will result in at least one district with 311,034 or more Black residents.

45. In addition, Tennessee congressional districts with a Black population of 311,034 have a Black percentage of exactly or nearly 40.51% (311,034 divided by 767,871, the ideal district population). Consequently, in any Shelby County districting scenario using the same combined region, at least one district will have a Black percentage of at least 40.51%. The same applies to VAP. Any two-district configuration using the same combined region will include at least one district with a BVAP of at least 38.77%.
46. Therefore, three districts are needed to reduce the Black population and its percentage in the Shelby County districts. That is what occurs in the 2026 Plan. Three districts enter Shelby County, divide the Black population, and configure each district's percentage so that each district is below 40.51% of the total population and 38.77% of BVAP.
47. The population shifts for Shelby County in the 2026 Plan are shown in Table 9. It is important to note that Table 9 presents only internal shifts within Shelby County. The table shows that 161,617 Black persons were shifted from CD 9 to CD 5, and 117,744 were shifted from CD 9 to CD 8. There were 193,202 Black persons who were not shifted from CD 9 and remained in the district.

Table 9 - District Population Shifts in Shelby County - 2022 Plan to 2026 Plan						
District 5 --	Population	%	Black	%	White	%
Dist. 9	221,035	100.00%	161,617	73.12%	42,135	19.06%
Moved to District 5	221,035	100.00%	161,617	73.12%	42,135	19.06%
Moved from District 5	0	0.00%	0	0.00%	0	0.00%
Total and % Population	221,035	100.00%	161,617	73.12%	42,135	19.06%
District 8 --	Population	%	Black	%	White	%
Dist. 8	167,087	37.96%	15,875	9.50%	129,943	77.77%
Dist. 9	273,045	62.04%	117,744	43.12%	106,824	39.12%
Moved to District 8	273,045	62.04%	117,744	43.12%	106,824	39.12%
Moved from District 8	25,380	5.77%	4,319	17.02%	15,857	62.48%
Total and % Population	440,132	100.00%	133,619	30.36%	236,767	53.79%
District 9 --	Population	%	Black	%	White	%
Dist. 8	25,380	9.45%	4,319	17.02%	15,857	62.48%
Dist. 9	243,197	90.55%	193,202	79.44%	21,981	9.04%
Moved to District 9	25,380	9.45%	4,319	17.02%	15,857	62.48%
Moved from District 9	494,080	100.00%	279,361	56.54%	148,959	30.15%
Total and % Population	268,577	100.00%	197,521	73.54%	37,838	14.09%

Source: U.S. 2020 Census Data; Maptitude Core Constituency Modified Report for Shelby County, TN, for the 2022 to 2026 Plans

48. This siphoning off of the Black population reduces the overall Black population percentage, decreasing CD 9 from 62.25% to 32.64%. CD 5 and CD 8 Black percentages increased from the 2022 Plan, from 13.40% to 29.28% and 18.76% to 27.99%, respectively. In the 2026 Plan configuration, none of these CDs has a Black population exceeding one-third of the district's population. A similar pattern is evident when viewing the VAP as well (see Table 10).

Table 10 - District VAP Shifts in Shelby County - 2022 Plan to 2026 Plan						
District 5 --	VAP	%	BVAP	%	WVAP	%
Dist. 9	170,023	100.00%	119,682	70.39%	37,725	22.19%
Moved to District 5	170,023	100.00%	119,682	70.39%	37,725	22.19%
Moved from District 5	0	0.00%	0	0.00%	0	0.00%
Total and % Population	170,023	100.00%	119,682	70.39%	37,725	22.19%
District 8 --	VAP	%	BVAP	%	WVAP	%
Dist. 8	126,550	100.00%	11,493	9.08%	100,644	79.53%
Dist. 9	209,464	100.00%	85,878	41.00%	90,810	43.35%
Moved to District 8	209,464	100.00%	85,878	41.00%	90,810	43.35%
Moved from District 8	19,301	100.00%	3,248	16.83%	12,557	65.06%
Total and % Population	336,014	100.00%	97,371	28.98%	191,454	56.98%
District 9 --	VAP	%	BVAP	%	WVAP	%
Dist. 8	19,301	100.00%	3,248	16.83%	12,557	65.06%
Dist. 9	180,725	100.00%	142,501	78.85%	19,564	10.83%
Moved to District 9	19,301	100.00%	3,248	16.83%	12,557	65.06%
Moved from District 9	379,487	100.00%	205,560	54.17%	128,535	33.87%
Total and % Population	200,026	100.00%	145,749	72.87%	32,121	16.06%

Source: U.S. 2020 Census Data; Maptitude Core Constituency Modified Report for Shelby County, TN for the 2022 to 2026 Plans

49. This cracking and removal of almost 300 thousand Black persons and over 200 thousand BVAP within Shelby County from CD 9 is another piece of evidence of racial motivation in the 2026 Plan development process.

C. 2026 Plan of Davidson County is Divided into Three Districts, similar to Shelby County

50. Although Shelby County contains a more egregious and obvious division of the Black population, Davidson County also exhibits a similar pattern. Table 11 presents population shifts across districts in Davidson County. Notably, Shelby and Davidson are the only two counties in the 2026 Plan split across three districts. In addition, Shelby and Davidson Counties have the two largest Black populations in the state.⁸

⁸

[https://data.census.gov/table/DECENNIALDHC2020.P8?q=Black+or+African+American&g=040XX00US47\\$0500000](https://data.census.gov/table/DECENNIALDHC2020.P8?q=Black+or+African+American&g=040XX00US47$0500000)

Table 11 - District Population Shifts in Davidson County - 2022 Plan to 2026 Plan						
District 4 --	Population	%	Black	%	White	%
Dist. 5	194,509	84.54%	55,276	28.42%	77,408	39.80%
Dist. 6	35,562	15.46%	8,335	23.44%	15,920	44.77%
Dist. 7	0	0.00%	0	0.00%		0.00%
Move to	230,071	100.00%	63,611	27.65%	93,328	40.56%
Move from	0	0.00%	0	0.00%	0	0.00%
Total and % Population	230,071	100.00%	63,611	27.65%	93,328	40.56%
District 6 --	Population	%	Black	%	White	%
Dist. 5	37,131	13.79%	7,172	19.32%	23,866	64.28%
Dist. 6	132,473	49.19%	34,825	26.29%	74,708	56.39%
Dist. 7	99,695	37.02%	26,317	26.40%	57,711	57.89%
Move to	136,826	50.81%	33,489	24.48%	81,577	59.62%
Move from	56,195	20.87%	15,046	26.77%	25,760	45.84%
Total and % Population	269,299	100.00%	68,314	25.37%	156,285	58.03%
District 7 --	Population	%	Black	%	White	%
Dist. 5	114,817	53.03%	7,172	6.25%	94,528	82.33%
Dist. 6	20,633	9.53%	6,711	32.53%	9,840	47.69%
Dist. 7	81,064	37.44%	40,006	49.35%	32,854	40.53%
Move to	135,450	62.56%	13,883	10.25%	104,368	77.05%
Move from	99,695	46.05%	26,317	26.40%	57,711	57.89%
Total and % Population	216,514	100.00%	53,889	24.89%	137,222	63.38%

Source: U.S. 2020 Census Data; Maptitude Core Constituency Modified Report for Davidson County, TN for the 2022 to 2026 Plans

51. As with the Shelby County tables, it is important to note that Table 11 shows only what is internal to Davidson County. In this instance, attention should be given to the resulting population left in the CDs within Davidson County. This is because changes had already occurred in Davidson County districts between the 2020 and 2022 Plans. In the 2022 Plan, Davidson County was divided into three districts, whereas in the 2020 Plan, the county was not split and resided wholly in CD 5. Consequently, the final population configuration of the 2026 Plan in Davidson County is more insightful than the change from 2022 to 2026.

52. Table 11 shows that the Black population was roughly evenly split and ultimately placed in CDs 4, 6, and 9. In the 2026 Plan, CD 4 contains 63,611 Black persons, CD 6 has 68,314, and CD 7 includes 53,889 Black persons. The resulting Black percentages for each district

are even more similar. CD 4 contains 27.65% Black persons, CD 6 has 25.37%, and CD 7 includes 24.89%. The difference among the three districts is 2.75% or less. This configuration divides the Black population, reducing the overall percentage of Black residents in any given district in Davidson County.

53. A similar pattern is observed when the VAP is examined (see Table 12). As in Shelby County, a review of the VAP table shows that Davidson County's BVAP has been divided into three CDs, each with roughly equal BVAP populations and very similar BVAP percentages.

Table 12 - District VAP Shifts in Davidson County - 2022 Plan to 2026 Plan						
District 4 --	VAP	%	BVAP	%	WVAP	%
Dist. 5	146,065	75.09%	40,587	20.87%	63,937	32.87%
Dist. 6	28,120	79.07%	6,362	17.89%	13,960	39.26%
Dist. 7		0.00%		0.00%		0.00%
Move to	174,185	75.71%	46,949	20.41%	77,897	33.86%
Move from	0	0.00%	0	0.00%	0	0.00%
Total and % Population	174,185	75.71%	46,949	20.41%	77,897	33.86%
District 6 --	VAP	%	BVAP	%	WVAP	%
Dist. 5	30,009	80.82%	4,989	13.44%	20,686	55.71%
Dist. 6	106,767	80.60%	25,202	19.02%	65,143	49.17%
Dist. 7	86,484	86.75%	20,464	20.53%	53,215	53.38%
Move to	116,493	85.14%	25,453	18.60%	73,901	54.01%
Move from	44,523	79.23%	11,356	20.21%	22,593	40.20%
Total and % Population	223,260	82.90%	50,655	18.81%	139,044	51.63%
District 7 --	VAP	%	BVAP	%	WVAP	%
Dist. 5	93,798	81.69%	5,484	4.78%	78,517	68.38%
Dist. 6	16,403	79.50%	4,994	24.20%	8,633	41.84%
Dist. 7	65,172	80.40%	30,082	37.11%	28,983	35.75%
Move to	110,201	81.36%	10,478	7.74%	87,150	64.34%
Move from	86,484	86.75%	20,464	20.53%	53,215	53.38%
Total and % Population	175,373	81.00%	40,560	18.73%	116,133	53.64%

Source: U.S. 2020 Census Data; Maptitude Core Constituency Modified Report for Davidson County, TN for the 2022 to 2026 Plans

D. 2026 Plan of Shelby County CD's Configurations are due to Racial Motivation

54. The 2026 Plan's division of the three districts in Shelby County is strategically configured so that each CD is less than one-third Black and has similar percentages across the three CDs. To achieve this parity, the population of each CD within the county was intentionally paired with a specific demographic population outside the county to maintain a relatively low and consistent Black population across the three CDs.
55. As Table 9 indicates, more of the Black population was added to CD 5 and retained in CD 9 than in CD 8. Although a significant portion of the Black population was shifted to CD 8, the 2026 Plan's population movements in Shelby County strategically shift the Black population into specific CDs.
56. Within Shelby County, the result maintains a high Black population percentage in CD 5 (73.12%) and CD 9 (73.54%), and a lower percentage in CD 8 (30.36%). CD 8 has a lower percentage and is combined with a portion outside Shelby County, where the Black percentage was twice that of CDs 5 and 9. As a result, the overall Black percentage in CD 8 remains relatively low, below 28%. In addition, CDs 5 and 9 remain relatively low in Black percentage across the district, at 29.28% and 32.64%, respectively, due to the areas outside Shelby County with which they are paired. A similar pattern is evident in the BVAP shifts (see Table 10). Two maps provide a visual explanation of what is occurring with the Shelby County CDs.
57. First, the thematic map in Figure 6 of the Shelby County's 2026 Plan clearly shows what is occurring. Figure 6 includes a map of Shelby County with the VTDs colored by the percent BVAP. Yellow and red indicate VTDs with BVAP > 50%. Blue, cyan, and green represent VTDs with BVAPs less than 50%.

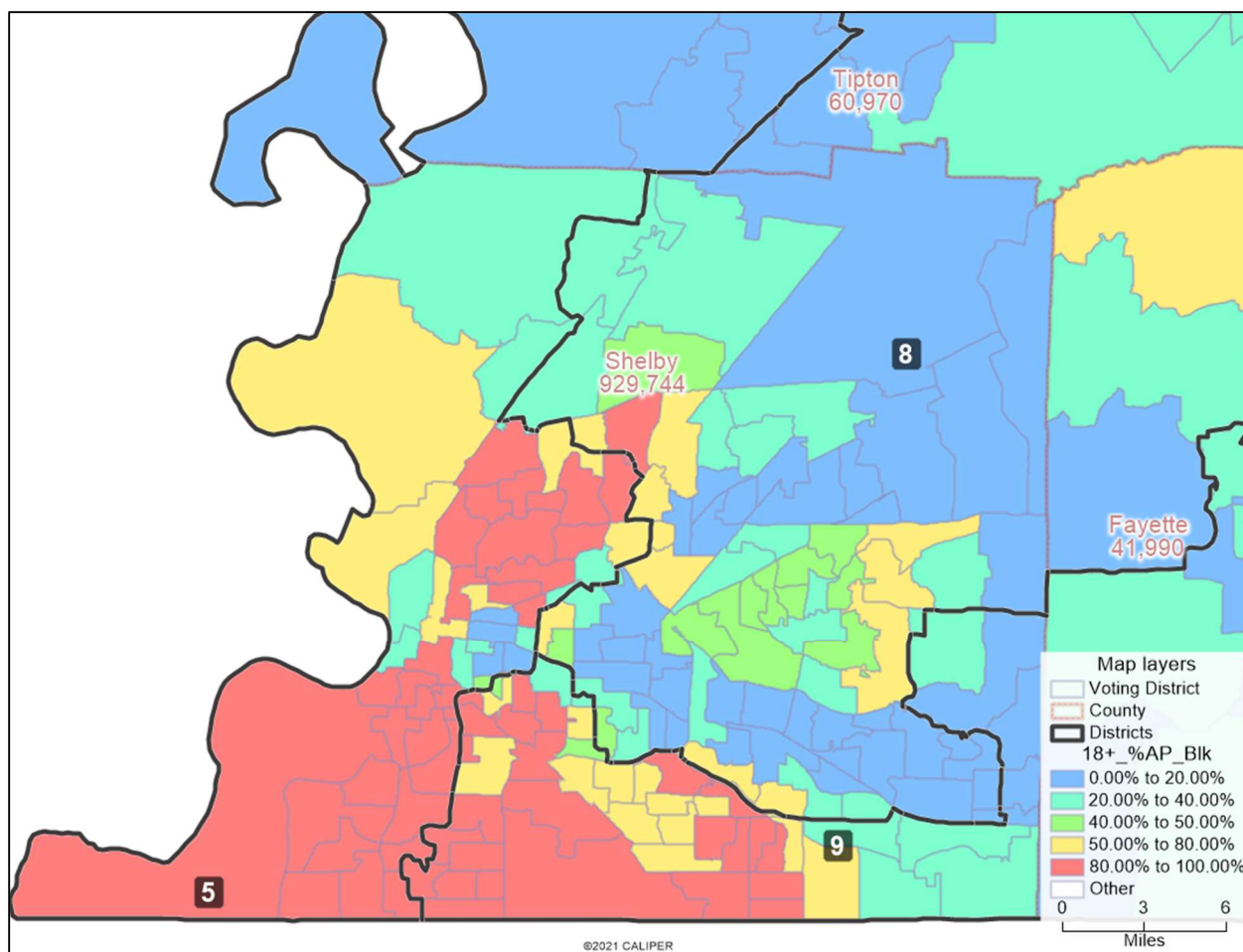


Figure 6 - Shelby County, TN 2026 Plan Zoom w/VTDs BVAP %

58. As the map shows, the mapdrawer carved out a relatively narrow area for CD 5 on the west, with a bulge that adds mostly yellow and red VTDs, or majority BVAP VTDs. A similar carving occurs in the south for CD 9, with the boundaries following the majority Black VTDs. On the other hand, the mapdrawer carves out for CD 8 a portion of Shelby County that contains VTDs with less than 50% BVAP (shown in the blue, cyan, and green VTDs). The result is that CD 5 includes a significantly high percentage of 73.12% Black and 70.39% BVAP within Shelby County. CD 9 contains an area that is 73.54% Black and 72.87% BVAP. However, CD 8 includes an area that is only 30.36% Black and 28.98% BVAP.

59. The Black population percentage discrepancy becomes clear when the portions outside Shelby County are analyzed. In CD 5, which lies outside Shelby County, the Black

percentage is 11.56%. Likewise, the portion of CD 9 outside Shelby County has a Black percentage of 10.64%. However, the portion of CD 8 outside Shelby County is 24.82% Black.

60. A clearer picture of what is occurring is shown in Figure 7. Figure 7 presents a zoomed map of the Shelby County CDs. The CDs are shown in parts within Shelby County and in the portion outside the county. The map label indicates the CD number and the Black percentage for the portion only.

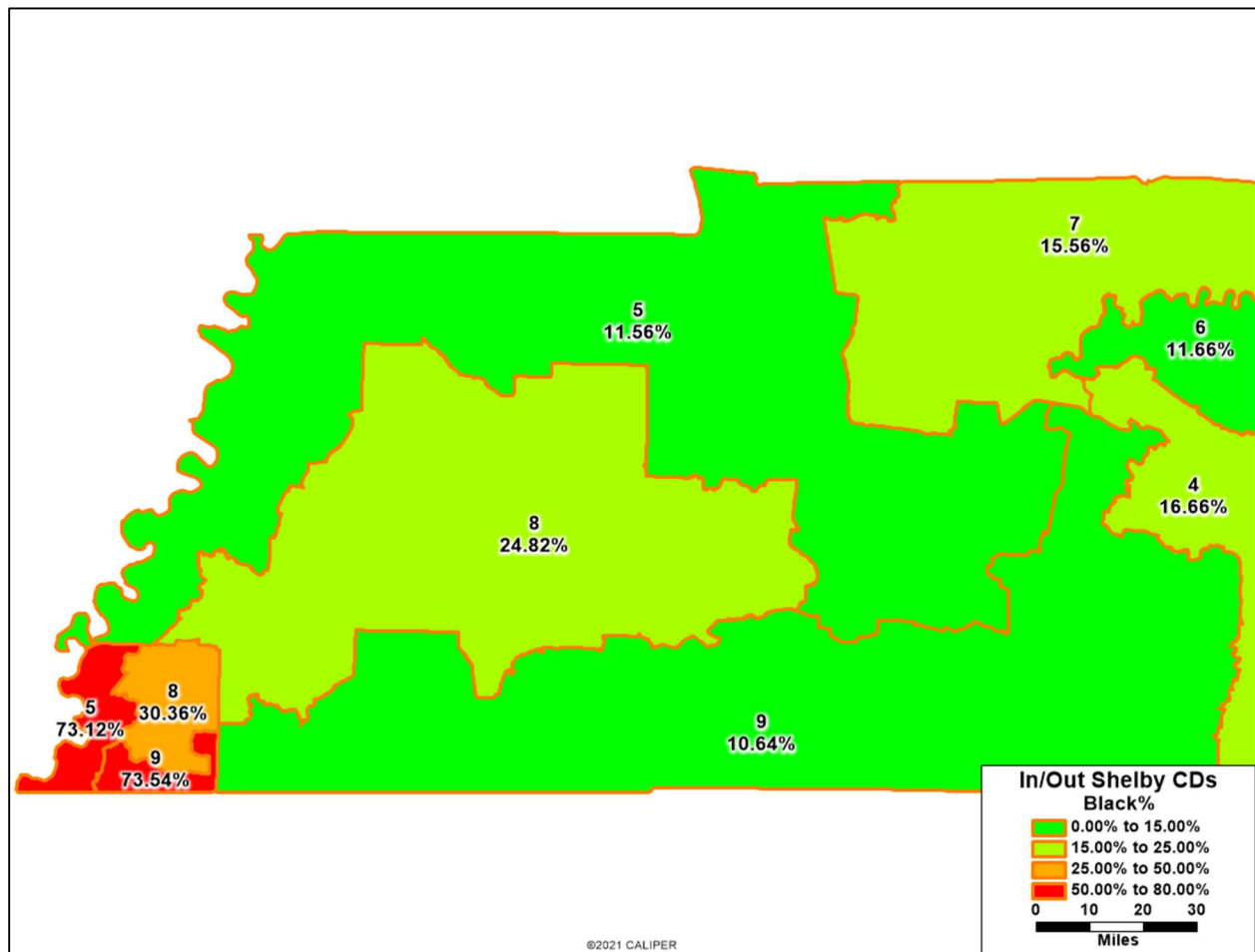


Figure 7 - Shelby County CDs Portion Inside and Outside County w/Black%

61. The bright green and olive green areas represent Black percentages of 0% to 15% and 15% to 25%, respectively. The orange and red areas, which denote Black percentages within Shelby County, represent 25% to 50% and 50% to 80%, respectively.

62. Viewing the map makes it clear that the portion within Shelby County added to CD 8 needed to be reduced in Black percentage to avoid increasing the district's overall Black population, unlike CDs 5 and 9, which did not.
63. Another perspective is that the portions added from Shelby County to CDs 5 and 9 included a high percentage of the Black population, while the portions of those CDs outside the county had a very low Black percentage. However, the CD 8 portion in Shelby County had a much lower Black percentage than the other two CDs. Thus, this portion of CD 8 was added to an area outside Shelby County that had twice the Black population of CDs 5 and 9. These combinations maintain a relatively low Black percentage across Shelby County CDs overall. In essence, these strategic movements ensured that the overall Black percentage for all Shelby County CDs remained below 33%.
64. Therefore, not only does the division of the Black population and the districts' distribution in Shelby County provide evidence of racial motivation, but the specific strategic placement of the Black population and their percentage in certain districts also provide additional evidence that race played a motivating role in the plan's development.

E. 2026 Plan's Redistricting Criteria Metrics Perform Worse due to Racial Motivation

65. I analyzed the 2020 and 2026 Plans, comparing them against several major traditional redistricting criteria. These criteria included equal population (one person, one vote), contiguity, compactness, minimizing the splitting of political subdivisions, and respect for communities of interest.
66. When comparing equal population and contiguity, the 2022 and 2026 Plans had the same metrics. However, differences emerged when reviewing the other criteria. Compactness, political subdivision splits (county and VTD splits), and splits of Census Places (municipalities and census-designated places) indicate that the 2026 Plan performs worse than the 2022 Plan across these three criteria (see Table 13 below).

Lower Compactness in the 2026 Plan

67. When comparing compactness, the 2026 Plan performs worse than the 2022 Plan. The 2026 Plan changes the configuration within Shelby County from two reasonably compact CDs to three elongated districts. The 2022 Plan, shown in Figure 8, includes two reasonably compact CDs that encompass Shelby County and other western counties.

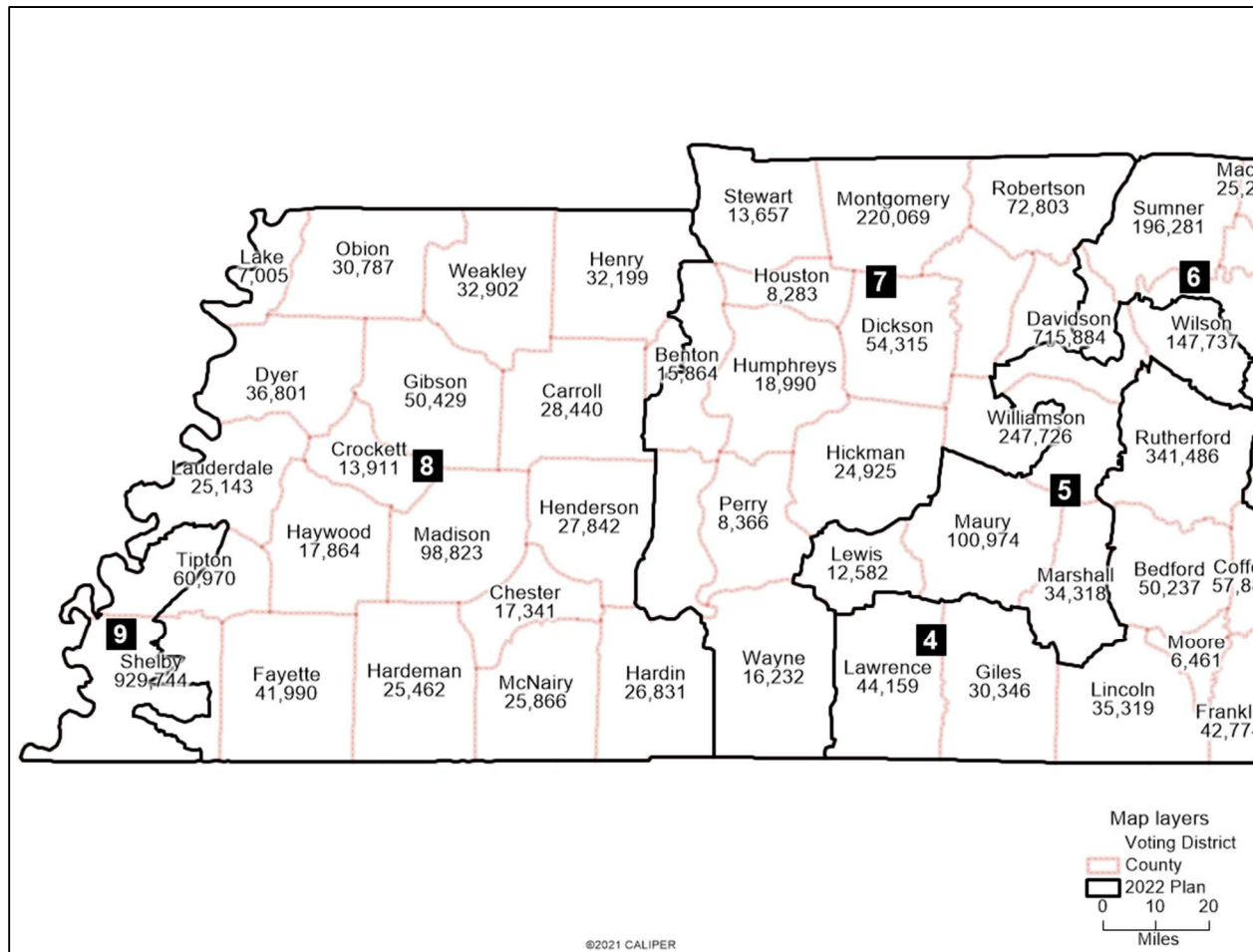


Figure 8 – 2022 Plan Shelby County’s CDs 8 and 9 Districts

68. However, the 2026 Plan creates three elongated CDs that extend from Shelby County to as far as Bedford County, near the center of the state (see Figure 9). To achieve an acceptable population deviation, both CDs 5 and 9 extend from Shelby County to Williamson County.

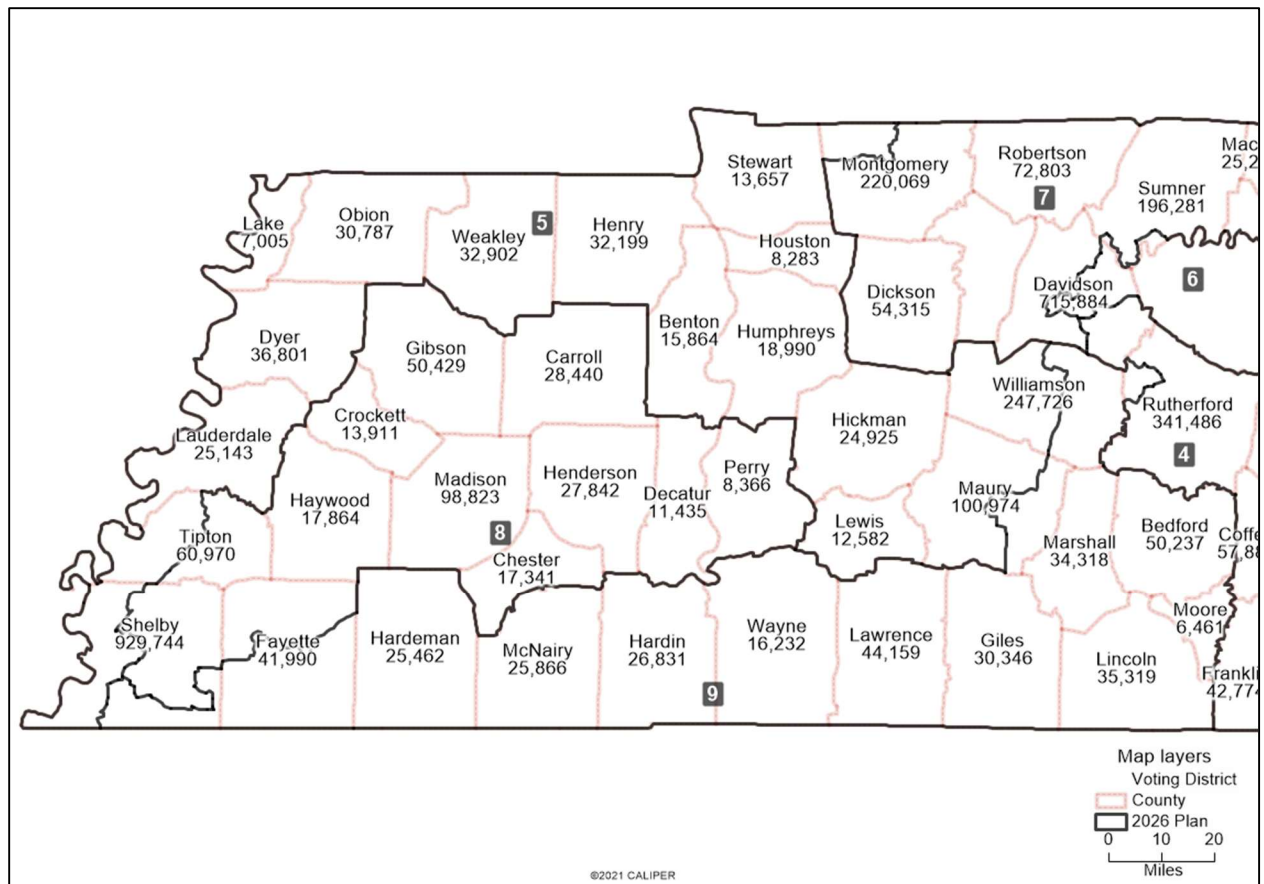


Figure 9 – 2026 Plan Shelby County’s CDs 5, 8, and 9 Elongated Districts

69. These elongated extensions were used to remove a substantial Black population from Shelby County and add it to CD 5. 221,035 persons, 73.12% of whom were Black, were removed from Shelby County and added to CD 5 (see Table 10). This population, included in CDs 8 and 9 of the 2022 Plan, had to be replaced to meet the acceptable population deviation.⁹
70. Thus, CDs 8 and 9 must extend eastward to include the additional population. Furthermore, Figure 8 shows that, with the exception of Shelby County, most western counties have smaller populations, typically 15-30 thousand persons. Thus, an ample number of counties must be combined to reach the ideal population size for the district. In addition to the western

⁹ Congressional districts are held to a “strict equality” standard accepted by the Courts. Usually, this translates to a population deviation of 0 or 1 person. Some states have exceptions to these values due to local priorities.

region, low-population counties must accommodate three CDs, producing the elongated configurations.

71. Proof of the non-compact nature of the Shelby County CDs is not only visible but also evident when analyzing them with compactness measures. Reviewing compactness using the plan mean and conducting a district-by-district comparison are revealing. The Reock and Polsby-Popper measures were used to determine compactness. The Reock and Polsby-Popper measures are the two leading measures used to determine compactness today.¹⁰
72. Comparing the 2022 and 2026 Plans shows that the 2022 Plan performs worse on the vast majority of compactness metrics (see Table 13). Table 13 presents the minimum, maximum, and mean values, along with a district-by-district comparison of Reock and Polsby-Popper measures.

Table 13 - 2022 and 2026 Plans' Compactness Comparison						
	2022 Plan		2026 Plan			
2022	Reock	Polsby-Popper	Reock	Polsby-Popper	Best	Best
Sum	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.27	0.12	0.17	0.09	2022	2022
Max	0.58	0.29	0.43	0.27	2022	2022
Mean	0.36	0.20	0.31	0.20	2022	Equal
District	Reock	Polsby-Popper	Reock	Polsby-Popper	Best	Best
1	0.32	0.27	0.32	0.27	Equal	Equal
2	0.41	0.17	0.41	0.17	Equal	Equal
3	0.34	0.15	0.32	0.20	2022	2026
4	0.27	0.19	0.43	0.25	2026	2026
5	0.28	0.13	0.20	0.09	2022	2022
6	0.37	0.25	0.30	0.24	2022	2022
7	0.40	0.27	0.33	0.25	2022	2022
8	0.58	0.29	0.35	0.20	2022	2022
9	0.29	0.12	0.17	0.14	2022	2026

Source: 2022 and 2026 Plan data extracted from Maptitude for Redistricting reports

¹⁰ Reock is an area compactness measure. It is the ratio of the district's area to the area of the smallest circumscribed circle. The circumscribed circle is the smallest circle that encloses the district. Reock yields lower scores for elongated districts. The Polsby-Popper measure is a perimeter compactness measure. It is the ratio of the district's area to the area of a circle with the same perimeter as the district. Polsby-Popper yields lower scores for irregular or jagged boundaries. In both measures, the closer the value is to 1, the more compact the district.

73. Table 13 shows that the 2026 Plan performs worse than the mean on both the Reock and Polsby-Popper measures. In a district-by-district comparison, the 2026 Plan performed better in only one of nine districts under the Reock measure. Three of nine were better under the Polsby-Popper measures. Since CDs 1 and 2 remained nearly the same, the compactness metrics were also the same.
74. For each of the Shelby County CDs 5, 8, and 9, all compactness metrics for the 2026 Plan performed significantly worse than those for the 2022 Plan, with one exception. That exception was CD 9's Polsby-Popper, which performed slightly better or similarly to the 2022 Plan. The district Reock compactness of CDs 5, 8, and 9 was worse due to elongated extensions into Shelby County. Reock compactness penalizes long district extensions. Polsby-Popper, however, penalizes irregular district boundaries. Thus, the irregular boundaries of CD 9 are comparable in the 2022 and 2026 Plans using the Polsby-Popper measurement. In addition, the CD 9 Polsby-Popper score is reduced in part because it follows the Mississippi River, which forms Tennessee's western border.
75. A similar decline in Polsby-Popper scores is evident in 2026 CD 5. CD 5 in the 2026 Plan has lower scores, in part because the district extends along the Mississippi River.
76. Ultimately, the central issue of racial motivation in this instance concerns the elongated extensions of CD 5, 8, and 9. These extensions are necessary because the Black population is divided in Shelby County. To create three fully populated CDs in the western area of the state with relatively similar Black percentages, the CDs must be configured as three elongated districts.
77. Because these area extensions, which lowered compactness, resulted from the carving out and cracking of the Black population within Shelby County, there is evidence that racial considerations outweighed compactness in the 2026 Plan.

Increased Political Subdivision Splits – Counties & VTDs

78. The 2026 Plan performs worse than the 2022 Plan in political subdivision splits, specifically counties and voting districts¹¹ (VTDs). The 2026 Plan includes two more county splits and seventeen additional VTD splits. At least one county split can be traced to the additional CD entering Shelby County.
79. Once an additional CD was added to Shelby County, each of the CDs (CDs 5, 8, and 9) must add additional population to achieve an acceptable population deviation. The additional population needed to reach the ideal population (767,871) for CDs 5, 8, and 9 is substantial. CD 5 requires 546,836 additional persons (221,035 in Shelby County), CD 8 requires 327,739 (440,132 in Shelby County), and CD 9 requires 499,294 (268,577 in Shelby County).
80. Because an additional CD splits Shelby County and there are only two adjacent counties, at least one of them must be split to allow the CDs to connect to other counties. However, both adjacent counties, Tipton and Fayette, are split (see Figure 8 above). These splits are directly caused by the additional CD used to divide the Black population in Shelby County.
81. Finally, one county split is due to the additional or third CD in Shelby County. The additional CD in Shelby County divides the Black population, which appears to increase the number of political subdivision splits and is consequently additional evidence of race motivation in the 2026 Plan.

Increased Communities of Interest Splits – Census Places

82. The 2026 Plan performs worse than the 2022 Plan when comparing the splits of popular communities of interest, such as municipalities and census-designated places (CDPs). Census Places largely include cities, towns, villages, and CDPs. Although municipalities are political subdivisions, they are often treated as communities of interest, as in this report.

¹¹ Voting Districts are generated by the U.S. Census Bureau and mimic local precincts; however, they use census geography, specifically census blocks. Precincts, on the other hand, are generated locally, usually by the local jurisdiction, and do not always follow census blocks.

83. The 2026 Plan includes five additional split Census Places compared with the 2022 Plan. One notable municipal split is the city of Memphis. In the 2026 Plan, Memphis is split among three CDs (CDs 5, 8, and 9). In the 2022 Plan, Memphis was split among two CDs, with 94.6% of the city residing in CD 9.

Traditional Redistricting Criteria Summary Comparison for 2022 and 2026 Plans

84. Reviewing compactness, political subdivision splits (county and VTD splits), and splits of Census Places (municipalities and CDPs) shows that the 2026 Plan performs worse than the 2022 Plan across all three criteria (see Table 12).

Table 12 - 2022 and 2026 Plans' Traditional Redistricting Criteria Comparison		
Criteria	2022 Plan	2026 Plan
Compactness (Reock/Polsby-Popper) - Plan Mean (R/PP) - By District (R/PP – Best CDs)	.36/.20 6 of 9/4 of 9	.31/.20 1 of 9/3 of 9
Political Subdivision Splits - County/VTD	10/65	12/82
Communities of Interest Splits - Census Places	33	38

Source: 2022 and 2026 Plan data extracted from Maptitude for Redistricting reports

85. Individually and collectively, these three criteria metrics show that the 2026 Plan performed worse than the 2022 Plan.

IX. Conclusions

86. Forty-one percent of the Black population and BVAP in Tennessee is concentrated in Shelby County. The 2022 Plan includes a majority-BVAP CD in the Shelby County area that is over 60% Black. However, the 2026 Plan divides the Black population into three CDs in the Shelby County region. This results in a fairly even distribution of BVAP, ranging from approximately 27% to 31%.

87. The division of Shelby County in the 2026 Plan places a significant share of the Black population in CDs 5, 8, and 9. In Shelby County, 161,617 Black residents live in CD 5, 133,619 in CD 8, and 197,521 in CD 9. Plan 2026 includes shifting almost 300,000 Black residents and over 200,000 BVAP from CD 9 to CDs 5 and 8.
88. Within Shelby County, the 2026 Plan also divides the city of Memphis into three CDs (CDs 5, 8, and 9). In the 2022 Plan, Memphis was split between two CDs, with 94.6% of the city in CD 9.
89. The 2026 Plan's division of the three districts in Shelby County is strategically configured so that each CD is less than a third (33%) Black, has a BVAP ranging from approximately 27% to 31%, and maintains similar percentages across the three CDs. To achieve this parity, the population of each CD within the county was intentionally paired with a demographic population outside the county to maintain a relatively low and consistent Black population across the three CDs.
90. The 2026 Plan's traditional redistricting criteria metrics perform worse than those of the 2022 Plan, particularly in compactness and in minimizing political subdivision splits. The 2026 Plan shows a decrease in compactness metrics compared with the 2022 Plan. The elongated extensions of CDs 5, 8, and 9 in the 2026 Plan reduce compactness values and are directly linked to the Black population's cracking in Shelby County. Furthermore, an additional political subdivision split of a county is also directly linked to the division of the Black population in Shelby County.
91. Based on a variety of evidence, including: 1) the division of Shelby County's Black population into three CDs; 2) the strategic carving out of Shelby County and the combining of district areas outside the county to keep overall district Black percentages relatively low; 3) the lower compactness performance due to the additional district added to Shelby County; and 4) the decreased performance on multiple redistricting criteria compared with the 2022 Plan, I conclude that race was a motivating factor in the configuration of the 2026 Plan.

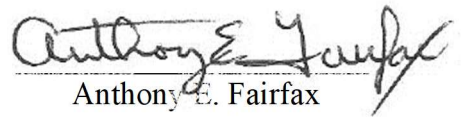
X. Appendices

92. The following appendices are included with this report:

- Appendix A - Resume of Anthony E. Fairfax
- Appendix B - Maps of the 2022 and 2026 Plans
- Appendix C - Maptitude Data Reports of the 2022 and 2026 Plans
- Appendix E - Core Constituencies Reports
- Appendix F - Additional Maps

The findings and conclusions in this report are based upon information that has been made available to me or known by me to date. I reserve the right to modify, update, or supplement the report and analyses as additional information is made available to me.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.


Anthony E. Fairfax
June 8, 2026

Appendices

Appendix A - Resume of Anthony E. Fairfax

Appendix B - Maps of the 2022 and 2026 Plans

Appendix C - Maptitude Data Reports of the 2022 and 2026 Plans

Appendix D - Core Constituencies Reports

Appendix E – Additional Maps

Appendix A

Resume of Anthony E. Fairfax

Anthony “Tony” Fairfax

16 Castle Haven Road, Hampton, Virginia 23666

Office Telephone: (757) 838-3881

Email: fairfax@censuschannel.com

Experience Highlights:

- Demographic, Geographic & Voter Data Analysis
- Multiple GIS Software/Census Data Skillsets
- Redistricting Plan Development & Analysis
- Gingles I & Racial Gerrymandering Analysis
- Redistricting Expert Reports & Testimony
- Redistricting Presentations & Training
- ESRI ArcGIS Map Applications & Dashboards
- Maptitude for Redistricting Proficiency

Education:

Master of Geospatial Information Science and Technology (2016)
North Carolina State University, Raleigh, North Carolina

Graduate Certificate in Geographic Information Systems (2016)
North Carolina State University, Raleigh, North Carolina

Bachelor of Science Degree in Electrical Engineering (1982)
Virginia Tech, Blacksburg, Virginia

Work Experience:

CensusChannel LLC, Hampton, VA (2009 - Present)

CEO & Principal Consultant - Providing overall project management and operations as well as primary consulting services for clients. Also responsible for customer acquisition and support. Core tasks include GIS-centered services centering on redistricting support (extensive use and analysis of traditional redistricting principles); demographic/socioeconomic, geographic, and voting data; GIS, Census Data, and Redistricting training; GIS data processing/conversion; expert redistricting plan development, analysis, depositions, testimony, and training. Major clientele and projects include:

- **Arnold & Porter, Washington, DC (2025)** - Provided expert report, analysis, and testimony on California’s congressional racial gerrymander court case.
- **NAACP, Baltimore, MD (2025 - Present)** - Providing redistricting consulting services centered on analyzing multiple states’ mid-decade congressional redistricting efforts by the major parties.
- **City of Anderson, IN (2024 - 2025)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the city. Efforts centered on developing new redistricting plan options for the city. The city ultimately approved the final plan that was developed.
- **Southern Poverty Law Center (SPLC), Montgomery, AL (2023 - 2024)** - Providing redistricting training for SPLC participants covering a wide range of subjects from basic traditional redistricting criteria to *Gingles 1* preconditions to Maptitude for Redistricting application.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2023 - 2025)** - Provided expert reports and/or deposition and testimony for redistricting court cases in GA, NC, and TX.
- **Davies & Rouco, LLP, Birmingham, AL (2023 – 2025)** - Provided expert reports, analysis, illustrative plans, and testimony on Jefferson County commissioner’s redistricting court case.

- **Wisconsin Department of Justice, Madison, WI (2023 – 2024)** – Provided expert report, analysis, and remedial plan for Wisconsin’s State Assembly and Senate District plans.
- **NAACP Legal Defense Fund (LDF), New York, NY (2022 – Present)** – Providing expert reports, analysis, illustrative and remedial plans, depositions, and testimony for two Louisiana congressional redistricting court cases.
- **The ACLU, New York, NY (2022 – 2025)** – Providing expert report, analysis, and illustrative plans for state senate redistricting court case in the state of Alabama.
- **Southern Echo, Jackson, MS (2018 - Present)** – Providing ongoing map-related educational and voting-related products pertaining to the state of Mississippi. Previously provided redistricting training sessions to Southern Echo partners throughout the south. Also provided GIS data, maps, and training to Southern Echo, community leaders, stakeholders, and subsequently in the field to groups working in the following states: Alabama, Arkansas, Georgia, Florida, Louisiana, Mississippi, New Mexico, North Carolina, South Carolina, and Texas. Specifically, deliverables include map-centered projects centering on education, GOTV, and redistricting.
- **Town of Cheverly, MD (2022 – 2024)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the town. Efforts centered on developing new redistricting plan options for the town.
- **U.S. Department of Justice, Washington DC (2022 – 2023)** – Provided expert report, illustrative plan, deposition, and testimony for Galveston County, TX redistricting court case.
- **City of Baltimore, MD Office of Council President (2022 - 2023)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the city’s Office of Council President. Efforts center on the alternative development of redistricting plans for the city.
- **Harvard Election Law Clinic (2022 - 2023)** – Provided expert report for Jacksonville, FL, city council and Duval County, FL, school board racial gerrymandering redistricting court case.
- **My Brother’s Keeper Alliance, Chicago, IL (2022)** – Provided demographic and socioeconomic analysis of select neighborhood communities.
- **The ACLU, New York, NY (2021 – 2023)** – Provided expert report, analysis, illustrative plans, depositions, and testimony for redistricting court cases in the states of Arkansas and California.
- **The Power Coalition for Equity and Justice, New Orleans, LA (2021 - 2022)** - Provided technical advice and input for building an equitable redistricting process in Louisiana for communities, legislators, and organizations. Providing analysis and plan alternatives for the Louisiana state legislative House and Senate districts where Black voters could elect a candidate of choice.
- **Crescent City Media Group, New Orleans, LA (2021)** – Provided redistricting training to the PreRedistricting Lab. Training centered on various educational presentations and hands-on sessions for community leaders and local/state legislators.
- **Bondurant, Mixson & Elmore LLP, Atlanta, GA (2021)** – Provided statewide redistricting plan development for Georgia congressional districts. Tasks included being part of a three-member map-drawing team that developed the proposed plan for the Georgia House and Senate Democratic caucus.
- **NAACP Legal Defense Fund (LDF), New York, NY (2020 – 2022)** - Provided redistricting development and analysis of various district configurations for city, county, and state-level plans.

- **Crowd Academy [an SCSJ-sponsored effort], Durham, NC (2020 - 2021)** - Provided redistricting training and support. Training centered on presentations on “How the Lines are Drawn,” which focuses on pre-plan development and plan development activities of redistricting. The target attendees included individuals in Georgia, North Carolina, South Carolina, Tennessee, and Texas. The effort also includes providing mentorship to Academy Fellows and Academy Mentors.
- **City of Everett, WA, Everett, WA (2020)** – Provided advice, consultation, and mapping services as Districting Master to the city of Everett, WA’s Districting Commission. Efforts centered on the development of the city’s first districting plan. Also assisted with answering questions at public forums and developed an ArcGIS web map application for public access to all plans.
- **NAACP, Baltimore, MD (2018 - 2022)** – Provided GIS consulting services via the NAACP (as fiscal agent) to the *Racial Equity Anchor Collaborative* (consisting of the Advancement Project, APIA Health Forum, Demos, Faith in Action, NAACP, National Urban League, NCAI, Race Forward, and Unidos U.S.). Efforts include developing the Racial Equity 2020 Census Data Hub. The Data Hub used ESRI’s Hub Cloud platform, which centralized web maps, mapping applications, and dashboards, enabling collaborative partners to locate hard-to-count areas by major race or ethnicity.
- **Campaign Legal Center, Washington, DC (2018 –2021)** – Developed illustrative redistricting plans, associated expert reports, depositions, and testimony in the *Holloway v City of Virginia Beach* court case. The Illustrative plans included two majority Hispanic, Black, and Asian combined districts to provide evidence of the first prong of *Gingles* for the city of Virginia Beach.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2015 - 2018)** - Provided several expert reports, depositions, and testimony for multiple redistricting court cases in North Carolina. Testimony, depositions, and reports included numerous plans at the congressional, state Senate, state House, and local jurisdiction levels. Analyses covered specific district characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.
- **The Rehab Crew, Durham, NC (2017)** - Provided geospatial & demographic analysis as well as website development and the creation of a proprietary application for the use of targeting real estate investment properties.
- **Congressman G.K. Butterfield, NC (2016 & 2021)** - Developed several congressional district plan alternatives for the State of North Carolina. Provided analyses on alternative district configurations.
- **Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)** - Developed state Senate and House redistricting plans for the state of Alabama in response to the *ADC v Alabama* court case. Also, a series of thematic maps depicting areas added from the previous plan to the enacted plan was provided, showing concentrations of African American voters added to the enacted plan.
- **Net Communications, Tallahassee, FL (2014 - 2015)** - Generated offline mapping and online web services (ArcGIS.com) of the client’s energy company’s resources and organizational assets. Mapping included the energy company's demographic, socioeconomic, and other resources.
- **National NAACP Office of General Counsel, Baltimore, MD (2012 - 2013)** - Provided project management and developmental support for the creation of a final report for the NAACP National Redistricting Project. Provided planning, organizing, supplemental writing, and interfacing with graphics entity for the complete development of the final report.
- **Congressional Black Caucus Institute (CBC Institute), Washington, DC (2011 - 2012)** - Provided contract duties as the Project Director and Consulting Demographer for the CBC Institute’s Redistricting Project. Provided project management, redistricting plan development, review,

analysis, advice, and answers to various questions pertaining to redistricting plans, principles, and processes. The focus included districts where Black voters could elect a candidate of their choice.

- **Mississippi NAACP, Jackson, MS (2011)** - Developed state Senate plans and analyzed enacted plans that the State Court developed.
- **African American Redistricting Collaborative (AARC) of California, Los Angeles, CA (2011)** - Provided demographic and redistricting contracted services. Responsible for developing congressional, state Senate, and state assembly plans for the collaborative. Special focus was given to the southern Los Angeles area (SOLA) and the Bay Area region. In addition to plan development, several socioeconomic maps were developed to show various communities of interest commonalities.

Also, developed a demographic profile using maps and reports of California's congressional, state Senate, and state Assembly districts for the purpose of preparing for the redistricting plan development process by identifying areas of growth throughout the state. The profiles included data from the American Community Survey (ACS) 2005-2009 and the 2010 Census.

- **The Advancement Project, Washington, DC (2011)** - Provided redistricting plan development services and training. Included was the development of a base map for a new seven (7) district plan in New Orleans that was further developed by community groups in Louisiana. The second effort included training a staff person in the use of Maptitude for Redistricting and in various redistricting scenarios.
- **Louisiana Legislative Black Caucus (LLBC), Baton Rouge, LA (2011)** - Provided redistricting plan development services. Responsibilities included supporting Caucus members' efforts to develop redistricting plans for the state House, state Senate, and Congress. Developed or analyzed over eighty different redistricting plans. The effort also included testifying before the Louisiana Senate Governmental Affairs Committee.
- **Community Policy Research & Training Institute (One Voice), Jackson, MS (2011)** - Developed the Mississippi State Senate plan, along with appropriate reports and a large-scale map.
- **National Black Caucus of State Legislators (NBCSL), Washington, DC (2010)** - Provided services as the Project Director for a 2010 census outreach effort. Developed proposal and managed personnel to generate and execute a strategy to utilize Black state Senate and House legislators to place targeted posters in select hard-to-count (HTC) areas throughout the country.
- **Duke University's Center for REGSS & SCSJ, Durham, NC (2010 - 2011)** - Contracted to serve as one of two Project Coordinators to support an expert preparation workshop hosted by Duke University's REGSS and the SCSJ.

Project Coordinator duties included developing, managing, and providing hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers from across the country on all aspects of redistricting plan development and the principles underlying it. Also, two hands-on redistricting scenarios were created to train large audiences on the plan development process.

Democracy South, Virginia Beach, VA (2004 - 2008)

Senior Technical Consultant - Provided technical, GIS mapping, data analysis, and management support for several projects and civic engagement-related efforts. Significant project efforts included:

- Senior Technical Consultant for the National Unregistered Voter Map. Developed a web-based interactive map that allowed visitors to view state/county-level information pertaining to the number of unregistered voters (2009)

- Co-Director of the Hampton Roads Missing Voter Project (a nonpartisan nonprofit voter engagement effort to increase voter participation with a focus on underrepresented population groups). The effort covered the seven major independent cities in Hampton Roads. Responsibilities included co-managing the overall civic engagement effort and were solely responsible for integrating and processing Catalist voter data into targeting maps and walk lists for all focus areas. Directly Responsible for overseeing the operations in Hampton, Newport News, Portsmouth, and Suffolk, Virginia (2008)
- Senior Technical Consultant for Civic Engagement Efforts. Provided telephone technical voter database support to 17 USAction state partners in 2004; and 12 USAction state partners in 2006. Trained client on VBASE voter data software; Performed voter data conversion; and voter targeting assistance.

Congressional Black Caucus Institute, Redistricting Project, Washington, DC (2001 - 2003)

Consulting Demographer - Provided services that included the development, review, and analysis of over 75 congressional district plans. Responsible for all setup and configuration of hardware and GIS software, and performed all development and analyses of redistricting plans. Congressional district plans were developed for 22 states. Also, performed as a redistricting expert advisor in a consolidated U.S. District Court Voting Rights case in Alabama.

National Voter Fund, Washington, DC (2000)

GIS Consultant (in a consulting partnership of Hagens & Fairfax) - Developed hundreds of precinct targeting maps for a civic engagement effort designed to increase the turnout in the November 2000 election. Efforts included geocoding voter data, integrating census data, and precinct mapping.

Norfolk State University, Poli. Science & Computer Science Dept., Norfolk, Virginia (1996 - 2001)

Adjunct Faculty - Provided instruction to students for BASIC Programming, Introduction to Computer Science, and Computer Literacy courses.

GeoTek. Inc. (formally GIS Associates), Virginia Beach, VA (1992 - 1995)

Consultant and Co-owner - Provided geodemographic research and analysis; client technical & training support; hardware/software system installation; and redistricting manual/ brochure development. Major clients and tasks included:

- New York City Housing Authority - Redistricting Training
- Maryland State Office of Planning - Redistricting Tech Support
- City of Virginia Beach, VA Planning Dept. - Redistricting Training/Tech Support
- City of Norfolk, VA Registrar - Redistricting Training/Tech Support
- City of Chesapeake, VA Registrar - Precinct Realignment

Norfolk State University, Political Science Dept., Norfolk, Virginia (1991 - 1999)

GIS Consultant - Provided a variety of geographic and demographically related tasks. Major Redistricting-related tasks included:

- Installed and operated the LogiSYS ReapS software that was used to perform the bulk of redistricting plans. Performed the intricate ReapS processing of the U.S. Census Bureau Topographically Integrated Geographic Encoded Referencing (TIGER) line files, Public Law 94-171 (PL94-171) demographic data, and the STF socioeconomic data series.
- Developed over 200 redistricting plans, located in over 60 jurisdictions, in the states of Florida, Louisiana, North Carolina, Texas, and Virginia. Developed plans from city/county to legislative to congressional district.

- Traveled to and trained several university faculty personnel on setting up and utilizing the ReapS redistricting system. Also, trained on redistricting plan development principles.

Major GIS-related tasks included:

- Performed a study commissioned by the U.S. Department of Transportation to analyze the ethnic differences in commuting behavior. This study extensively used the Summary Tape File 3A (STF3A) and the Public Use Microdata Sample (PUMS) to identify, map, and report the frequency and average travel time to and from work for Miami, FL MSA; Kansas City, MO-KS MSA; and Detroit, MI MSA.
- Performed a study funded by the City of Norfolk, VA, and NSU School of Business that determined and analyzed the trade area of a section located in Norfolk, VA. Major duties included geocoding customer addresses, producing address-point maps, and developing demographic reports for the project.
- Performed a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to revitalize a neighborhood located in Norfolk, VA. The purpose of the GIS component was to first establish a socioeconomic baseline, then track the progress of the revitalized area, as well as select surrounding areas. Geocoded address locations, generated points, and demographic thematic maps, and produced reports of the target areas.
- Provided demographic analysis of proposed newly incorporated areas in Florida for local Florida civic organizations.

Cooperative Hampton Roads Org. for Minorities in Engineering, Norfolk, VA (1991 - 1992)

Computer Consultant - Designed and developed a menu-driven student database, used to track hundreds of minority Junior High and High School students who were interested in pursuing science or engineering degrees.

Norfolk State University, School of Education, Norfolk, VA (1990 - 1991)

Technical Consultant/Computer Lab Manager- Provided a variety of support, including hardware and software installation, faculty workshops, course instruction, Network Administrator, and technical support.

Engineering and Economics Research (EER) Systems (1989)

Technical Consultant - Coordinated and participated in writing, editing, and formatting technical test documents; played a central role in the development of the Acceptance Test Procedures for the initial phase of a multi-million dollar Combat Maneuver Training Complex (CMTC) in Hohenfels, Germany; and was responsible for the final review and editing of all test documentation.

Executive Training Center (ETC). Newport News, VA (1988 - 1989)

Vice President & Co-founder - Managed over 11 part-time and full-time employees; assisted in developing and implementing company policies; performed the duties of the Network Administrator for a Novell-based computer training network; and taught several courses by substituting for instructors when necessary.

Engineering & Economics Research (EER) Systems. Newport News, VA (1986 - 1987)

Hardware Design Engineer and Electronics Engineer - Provided engineering and select project management support for the development of the following million/multi-million dollar project efforts:

- Baseline Cost Estimate (BCE) to be used in the procurement of the Combat Maneuver Training Complex - Instrumentation System (CMTC-IS)
- Operational and Maintenance (O&M) Support Plan at the National Training Center (NTC)
- Quality Assurance Surveillance Plan for the O&M Support Plan at the NTC; Configuration Management Plan for CMTC

- Requirements Operational Capabilities (ROC) Analysis for an instrumentation System at the U.S. Army Ranger School, Georgia
- ROC Analysis for an Instrumentation System at Fort Chaffee, Arkansas
- Suggested Statement of Work for the Digital Data Entry Device (DDED); and the Concept Formulation Package and Requirements Definition to Support Interface and Integration of Red Flag at the NTC
- Phase II of a multi-million dollar GIS-based concept test demonstration. Performing as Assistant Test Director (ATD) - liaison between the Government Director Army Ranges and Targets (DART) personnel and EER Systems' personnel; and assumed the role of Test Director when required (1987)
- Suggested Statement of Work (SOW) for a \$1 million procurement of Multivehicle Player Units (MVPUs) at the NTC. Performed as Project Task Manager for a team of engineers, computer programmers, and technical support personnel in the development of a position location player unit for the Army (1986)

Teledyne Hastings-Raydist, Hampton, VA (1982 - 1986)

Hardware Design Engineer - Designed and developed custom flow and vacuum measuring products; Project Manager for the production and completion of a \$.25 million flow measuring system; Electrical Engineer - Chiefly responsible for developing special products for customers.

Major Litigation Clients & Testimony Related Efforts:

Arnold & Porter, Washington, DC (2025)

Developed expert report, provided deposition and testimony for California's consolidated *Abbott v. League of United Latin American Citizens* racial gerrymander redistricting court case. Provided rebuttal analysis to the plaintiff's expert's claim of a racial gerrymander.

Southern Coalition for Social Justice [SCSJ], Durham, NC (2023 - 2025)

Provided expert report and illustrative plan for *Berger v. North Carolina State Conference of the NAACP* vote dilution case. Included expert report and deposition. Also provided an expert report and an illustrative plan for *Finn v. Cobb County Board of Elections*, a racial gerrymandering school board redistricting court case in Cobb County, Georgia. Developed supporting maps and population tables reflecting shifts in racial population from the prior plan to the adopted plan.

Davies & Rouco, LLP, Birmingham, AL (2023 – 2025)

Developed expert report, illustrative plans, and provided deposition and testimony for Jefferson County's *Addoh-Kondi et al v. Jefferson County Commission* racial gerrymander redistricting court case. Developed supporting maps and population tables reflecting shifts in racial population from the prior plan to the adopted plan.

Wisconsin Department of Justice, Madison, WI (2023 – 2024) – Provided expert report, analysis, and remedial plan for *Clarke v. Wisconsin Elections Commission (WEC)* violation of the Wisconsin Constitution's contiguity requirement redistricting court case. The effort included Wisconsin's State Assembly and Senate District Plans.

NAACP Legal Defense Fund (LDF), New York, NY (2022 – Present)

Developed illustrative and remedial plans, expert reports, and provided deposition and testimony for Louisiana's *Ardoin v. Robinson* congressional redistricting vote dilution court case.

ACLU, New York, NY (2022 – 2025)

Developed expert report, analysis, and illustrative plans, and provided deposition and testimony for the *Alabama NAACP v. Allen* vote dilution state senate redistricting court case in the state of Alabama.

Election Law Clinic at Harvard Law School, Cambridge, MA (2022 - 2023)

Developed a declaration for the *Jacksonville Branch of the NAACP v. City of Jacksonville* racial gerrymandering redistricting court case. The declaration centered on “Core Retention” analysis tables presenting the demographic change in population of Duval County, FL, school board districts from the previously approved plan to the recently enacted plan. Also, the same case the prior year involved developing an expert report that contained a series of thematic and demographic maps and table analyses for Jacksonville, FL City Council districts, providing evidence of racial gerrymandering.

ACLU of Southern California, Los Angeles, CA (2022 – 2023)

Developed an illustrative redistricting plan and associated expert report for the *Inland Empire United et al v. Riverside County et al* redistricting court case. The illustrative plan included a second additional majority Latino district as opposed to the county’s plan of one.

U.S. Department of Justice, Washington DC (2022 – 2023)

Developed an illustrative redistricting plan and associated expert report for the *Petteway et al v Galveston County* redistricting court case. The illustrative plan included the “Least Change” approach to bring the plan within acceptable deviation. The plan continued to contain a majority Black and Latino district as opposed to the state’s plan. The plan, report, and deposition provided evidence of the first prong in *Gingles*.

Southern Coalition for Social Justice (SCSJ), Durham, NC (2022 – 2025).

Developed an expert report that included opinions on the state’s expert report in the *LULAC et al v. Abbott* Texas state legislative redistricting court case. The report responded to any conclusions by the State’s expert regarding minority vote dilution, specifically concerning the Fair Maps proposed plans.

NAACP LDF, New York, New York, NY (2022 - 2025)

Developed an illustrative redistricting plan and associated expert report for the *Robinson v. Ardoin* redistricting court case. The illustrative plan included a second, majority-Black district, unlike the state’s plan. The plan, report, and testimony provided evidence of the first prong of *Gingles*, proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

ACLU, New York, New York, NY (2021 – 2024)

Developed an illustrative redistricting plan and associated expert report for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* preliminary injunction case. The illustrative plan included five additional majority-Black districts, as opposed to the Board of Apportionment plan. The plan, report, and testimony provided evidence of the first prong in *Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

Campaign Legal Center, Washington, DC (2018 – 2020)

Developed multiple illustrative redistricting plans and associated expert reports for *Latasha Holloway v City of Virginia Beach* court case. The illustrative Plans included two majority Hispanic, Black, and Asian combined (Coalition) districts to provide evidence of the first prong in *Gingles* in the section 2 court case. The effort included an additional rebuttal, supplemental report, deposition, and testimony.

Virginia NAACP, Richmond, VA (2018)

Developed a statewide remedial plan for *Bethune-Hill v. Virginia State Bd. of Elections*. The plan corrected 11 unconstitutional, racially gerrymandered state House districts in the Richmond, Peninsula, and Southside Hampton Roads areas.

Southern Coalition for Social Justice (SCSJ), Durham, NC (2018)

Developed a demonstrative remedial redistricting plan and associated expert report, as well as provided a deposition for *North Carolina State Conference of NAACP Branches v. Lewis* Wake County Superior Court case. The demonstrative remedial plan corrected the two Wake County, N.C. House Districts declared by a federal court to be racially gerrymandered districts (HD33 & HD38). The expert report not only discussed my results but also offered the Court insight into how a map drawer would reasonably go about fixing racially gerrymandered districts while still complying with the state constitution's prohibition on mid-decade redistricting.

Texas NAACP, San Antonio, TX, (2017)

Provided expert report, deposition, and testimony for the *Perez v. Abbott* US Federal District Court Case. Analyses focused on specific redistricting criteria, including population deviation, compactness, political subdivision splits, and communities of interest for congressional and House plans. Additional analysis was performed on demographic projections for certain congressional and State House districts.

Southern Coalition for Social Justice (SCSJ), Durham, NC (2015 - 2016)

Provided expert testimony, deposition, and expert report for the *City of Greensboro v The Guilford County Board of Elections* U.S. District Court Case. Deposition and report included several district plans for the city council of Greensboro, NC, and analyzed specific characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.

Provided expert testimony and report for the *Covington v. North Carolina* federal redistricting court case. The testimony included an analysis from *Dickson v Rucho* (also *NAACP v North Carolina*) of compactness on state legislative House and Senate districts.

Provided expert testimony and report for the *Wright v. North Carolina* federal redistricting court case. The testimony and report included an analysis of population deviation, compactness, partisan impact, and incumbent residences for county commission and school board plans.

Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)

Developed Senate and House redistricting plans for the state of Alabama for the *ADC v. Alabama* court case. Provided deposition on the creation of the plan. Also, a series of thematic maps was generated, depicting areas added from the previous benchmark plan to the enacted plan and showing concentrations of African American voters added to the enacted plan.

Southern Coalition for Social Justice (SCSJ), Durham, NC (2014)

Provided expert testimony, report, and deposition for the federal redistricting court case, *Perez v. Perry* of Texas. The report included an analysis of population extrapolations and projections for several submitted plans for select congressional and House districts.

North Carolina NAACP, Raleigh, NC (2012)

Provided expert opinions and analysis in an affidavit for the *NC NAACP v. State of North Carolina* federal redistricting case (later *Dickson v Rucho*). The affidavit included an examination of compactness measurements for the Congressional, State Senate, and State House "Benchmark" plans, several approved plans, and several legislative-submitted plans. The report also contained county splits for the target districts.

Southern Coalition for Social Justice (SCSJ), Durham, NC (2011)

Provided expert opinions and analysis in an affidavit for the *Moore v. State of Tennessee* redistricting case. The affidavit included an analysis of county splits comparing State Senate "Benchmark" plans, the approved plan, and several legislative submitted plans.

Texas NAACP, San Antonio, TX (2011)

Provided expert report, deposition, and testimony for the federal redistricting court case *Perez v. Perry*. Testimony covered the evaluation of traditional redistricting criteria of the Congressional and House-approved plans compared to several proposed or legislative submitted plans.

Louisiana Legislative Black Caucus, Baton Rouge, LA (2011)

Provided expert testimony in front of the Senate and Governmental Affairs Committee. Testimony included the analysis of two redistricting plans comparing ideal population deviation, political subdivision splits (Parishes), and compactness ratios. Also, developed a redistricting plan and testified in front of the House Governmental Affairs Committee in support of a new majority-minority (African American) congressional district in Louisiana.

Morrison & Foerster LLP, Los Angeles, CA (2004)

Provided expert report on several state Senate plans for the *Metts v. Murphy* Rhode Island court case. The report contained analyses of communities of interest areas that were not included in the state's enacted plan for the only majority-minority district.

Congressional Black Caucus Institute, Redistricting Project, Washington, DC (2002)

Performed as the redistricting mapping expert for Congressman Hilliard in a consolidated U.S. District redistricting court case in Alabama (*Montiel v. Davis* and *Barnett v. Alabama*). Developed the submitted plan and provided advice to legal counsel for the court case.

Council of Black Elected Democrats (COBED) New York State, New York, NY (2002)

Performed as one of the redistricting experts (*Allen v Pataki/Rodriguez v Pataki*) by developing several New York State congressional district plans that COBED presented.

Miami-Dade, Florida (1993)

Provided expert technical redistricting support as one-half of the Expert Master's Team for the remedial Plan (*Meek v. Metropolitan Dade County*). Developed over 50 commissioner district plans for the county as well as the final adopted Plan for the metro Dade County.

NAACP Legal Defense and Educational Fund (LDEF), New York, NY (1993)

Provided expert technical support for the *Shaw v. Reno* Supreme Court case (via Norfolk State University). Analyzed and compared various compactness ratios for congressional districts throughout the U.S. The results were compared to the 12th congressional district of North Carolina. Also, developed several alternative congressional district plans.

Major GIS/Demographic/Redistricting Training and Presentations:

Southern Echo (2021)

Presented multiple training sessions (11 planned) on various aspects of redistricting. Included both presentations and, ultimately, hands-on (Dave's Redistricting)

Crowd Academy (2020 – 2021)

Presented multiple Training sessions (>25) that center on "How the lines are Drawn," which focuses on the plan development activities of redistricting.

Crescent City Media Group (2021)

Presented ten three-hour-long training sessions on various aspects of redistricting. Included both presentations and hands-on (Maptitude for Redistricting)

NAACP LDF/MALDEF Expert Convening (2021)

Provided multiple sessions to potential future experts on expert report development, giving depositions, and providing testimony.

SIF Voting Rights Convening (2021)

Presented on a panel, the unique aspects and issues pertaining to the 2020 round of redistricting.

SIF Voting Rights Convening (2020)

Presented on a panel where various preparatory aspects and questions that should be addressed prior to the development of plans.

Delta Days in the Nation's Capital, Washington, DC (2020)

Provided a panel presentation on suggested efforts in preparation for the next round of redistricting. Plenary presentation to several hundred Delta Sigma Theta (DST) sorority sisters throughout the country.

William and Mary, Williamsburg, VA (2019)

Presented a lecture to the GIS and Districting course students, centering on improving as well as potential adverse trade-offs from improvements of the adopted redistricting plan chosen by the special masters of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case.

Southern Echo, Jackson, Mississippi (2019)

Provided detailed training/presentation (3 hours) on various aspects of redistricting. Topics included: Relevant redistricting court cases, traditional redistricting criteria, and redistricting data.

William and Mary, Williamsburg, VA (2018)

Presented a lecture to the GIS and Districting course students, centering on aspects of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case. The discussion focused on how to develop a plan to correct the 11 unconstitutional, racially gerrymandered House districts in those states.

Congressional Black Caucus Institute, Washington, DC (2016)

Presented at the annual legislative conference in Tunica, MS. Presented the election demographic analysis for the 2016 presidential and Senate elections. The panel also included Congressman Cedrick Richmond (L.A.), Congressman Sanford Bishop (G.A.), and Professor Spencer Overton.

Coalition of Black Trade Unionists (CBTU), Chicago, IL (2015)

Presented at the annual CBTU conference on the election panel that included Congressman Al Green (TX) and Congressman Bobby Rush (I.L.).

Nobel Women's Initiative, Washington, DC (2015)

Presented on a panel at the annual conference in San Diego, CA, on the upcoming 2020 census.

Tennessee NAACP, Nashville, TN (2011)

Provided redistricting training session on the mapping and demographic aspects of Redistricting.

Congressional Black Caucus Institute, Washington, DC (2002 - 2012, 2014)

Presented "The Demographics of Campaigns" twelve times at the institute's annual political campaign "Boot Camp." The presentation covers how to locate and utilize demographic data for political campaigns.

Congressional Black Caucus Foundation (CBCF), Washington, DC (2011)

Presented as one of the panelists at the "Judge A. Leon Higginbotham" Braintrust at the CBC Annual Legislative Conference. The panel was moderated by Congressman Mel Watt.

The Advancement Project, Washington, DC (2011)

Trained staff GIS person on Maptitude for Redistricting as well as on redistricting scenarios.

National Association for the Advancement of Colored People, Baltimore, MD (2011)

Provided training session on “Redistricting Mapping Overview” at the organization’s national redistricting training seminar for state and local chapters.

Congressional Black Caucus Institute, Washington, DC (2010)

Presented at the annual CBC Institute conference in Tunica, MS (The panel included Congressman John Lewis and Congressman Jim Clyburn). Outlined two critical issues that would surface in the 2010 round of redistricting: 1) Prison-based Gerrymander, and 2) The use of Citizen Voting Age Population (CVAP).

Community Census and Redistricting Institute (CCRI), Durham, NC (2010)

Developed, managed, and provided hands-on training for the Political Cartographer’s side of a week-long intensive “redistricting expert” preparation workshop. The workshop trained 18 political cartographers on all aspects of plan development.

North Carolina University’s Center for Civil Rights, Chapel Hill, NC (2010)

Provided a presentation on “Redistricting Laws & GIS” at the *Unfinished Work* conference. The presentation outlined the evolution of major redistricting laws and GIS and their impact on minority representation.

NAACP Legal Defense Fund AIRLIE Conference, AIRLIE, VA (2010)

Provided training using hands-on “paper” redistricting scenarios to voting rights advocates on developing a plan without the use of computers.

Young Elected Officials, Los Angeles, CA (2010)

Provided training using hands-on “paper” redistricting scenarios to young legislators on developing a plan without the use of computers.

Young Elected Officials, Alexandria, VA (2010)

Provided overview training on the significant aspects of redistricting to young legislators.

North Carolina University’s Center for Civil Rights, Chapel Hill, NC (2006)

Provided a presentation on “Congressional Elections Won by African Americans Race & Ethnicity District Perspective (1960 - 2004)” at the *Who Draws the Lines? The Consequences of Redistricting Reform for Minority Voters* conference.

Howard University - Continuing Education - HBCU GIS Workshop, Washington, DC (2002)

Provided a presentation on redistricting and the use of Maptitude for Redistricting to faculty members of Historically Black Colleges and Universities (HBCUs).

Norfolk State University Redistricting Project Training Workshops (1991 - 1998)

Provided redistricting training to the following:

- Alabama State University, Montgomery, Alabama
- Albany State University, Albany, Georgia
- Florida A & M, Tallahassee, Florida
- National Conference of Black Political Scientists, Atlanta, Georgia Conference
- Norfolk State University, Norfolk, Virginia
- North Carolina A & T State University, Greensboro, North Carolina
- North Carolina Central University, Durham, North Carolina
- Southern University, Baton Rouge, Louisiana
- Williams College, Williamstown, Massachusetts

Major GIS/Redistricting/Voter Data Software Experience:

- ArcGIS - GIS Software - Primary GIS Software after 2012 ([ESRI](#))
- ArcGIS Online – Including Story Maps & Web Application Builder ([ArcGIS.com](#))
- GRASS GIS – Open-Source GIS ([OSGeo](#))
- Maptitude for Redistricting - Primary Redistricting software, since 2001 ([Caliper](#))
- ESRI Redistricting Online - Beta Tester ([ESRI](#))
- Public Mapping Project – Initial Advisory Board Member ([an open-source online software](#))
- ReapS Redistricting and Reapportionment System - Redistricting software, 1990s ([LogiSYS](#))
- Voter Activation Network System [NPGVAN](#)
- Voterlistonline.com Aristotle software [Aristotle](#)

GIS Skillset/Coding Languages:

- | | | |
|-----------------------|------------------------|--------------|
| • Geocoding Data | • Suitability Analysis | • Python |
| • Linear Referencing | • Image Classification | • PostgreSQL |
| • Digital Cardinality | • ArcGIS Web Services | |
| • Spatial Statistics | • pdAdmin | |

ESRI Training Certificates:

- Learning ArcGIS Desktop (for ArcGIS 10) - 24 hrs. training
- Turning Data into Information Using ArcGIS 10 - 18 hrs. training
- Basics of Raster Data (for ArcGIS 10) - 3 hrs.. training
- Using Raster Data for Site Selection (for ArcGIS 10) - 3 hrs. training
- Working with Geodatabase Domains and Subtypes in ArcGIS - 3 hrs. training
- Network Analysis Using ArcGIS - 3 hrs. training.

Publications:

Books

- *An Introduction to the Presidential Trend*, Statistical Press, March 2015
- *The Presidential Trend*, Statistical Press, December 2013
- *A Step-by-Step Guide to Using Census 2000 Data*, MediaChannel LLC, March 2004. Also included was a companion CD-ROM (sold through various Census-related workshops and training sessions and used in a political science course).

Manuals

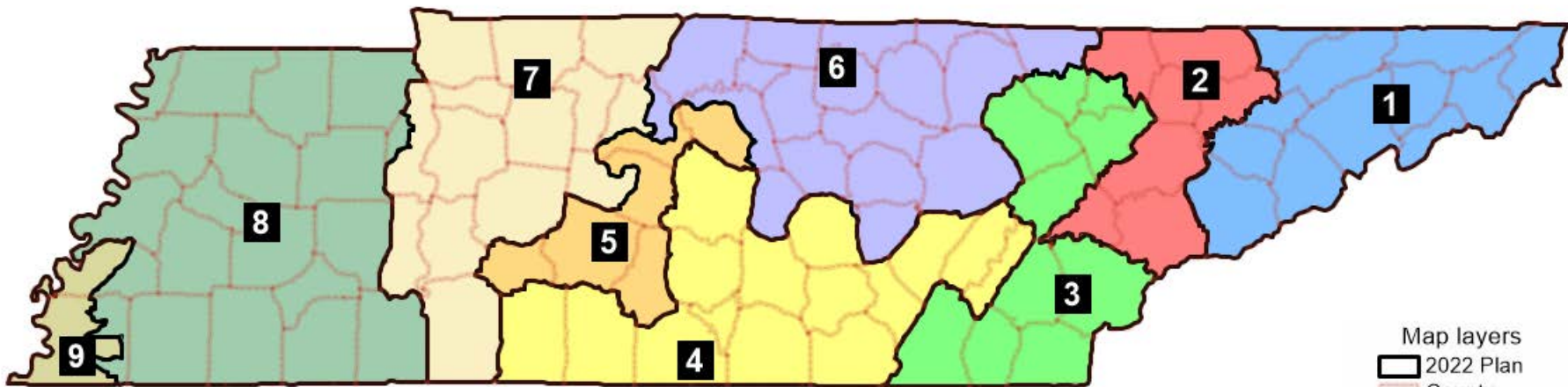
- *A Beginner's Guide to Using Census 2000 Data*, November 2002 (Co-authored- developed for the U.S. Census Bureau's Census Information Centers)

Articles

- "Precision Voter Targeting: GIS Maps Out a Strategy," Geo Info Systems, November 1996 (Co-authored one of the first articles published on using modern-day GIS for voter targeting).

Appendix B

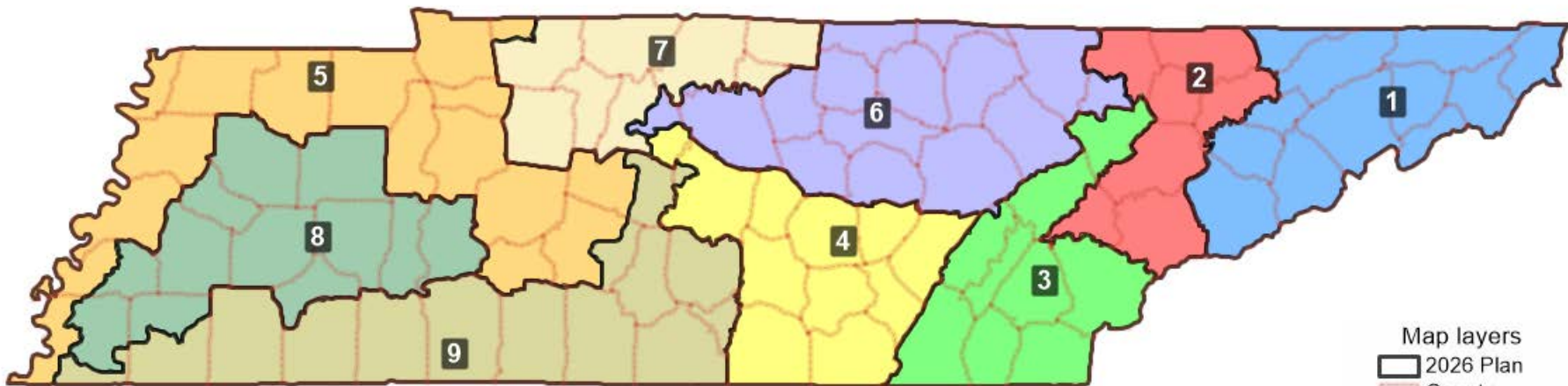
Maps of the 2022 and 2026 Plans



Map layers
2022 Plan
County
District

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

0 25 50
Miles



Map layers
2026 Plan
County District

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

0 25 50
Miles

Appendix C

Mapitude Data Reports of the 2022 and 2026 Plans

2022

- Population Summary TTL & %
- Population Summary VAP & %
- Population Summary CVAP & %
- Population Summary BCVAP & %
 - Contiguity
 - Compactness Measures
 - Political Subdivision Split
 - Census Places Splits
 - District by County

2026

- Population Summary TTL & %
- Population Summary VAP & %
- Population Summary CVAP & %
- Population Summary BCVAP & %
 - Contiguity
 - Compactness Measures
 - Political Subdivision Split
 - Census Places Splits
 - District by County

Population Summary

Friday, May 15, 2026

8:46 PM

District	Population	Deviation	% Devn.	[Hispanic Origin]	NH_Wht	NH_Ind	NH_Asn
1	767,871	0	0.00%	37,332	674,765	1,848	6,317
2	767,871	0	0.00%	41,560	630,610	1,704	13,875
3	767,871	0	0.00%	44,410	597,466	1,848	11,419
4	767,872	1	0.00%	61,910	582,497	1,978	15,009
5	767,871	0	0.00%	79,120	531,224	1,388	32,440
6	767,871	0	0.00%	59,323	596,648	1,789	8,515
7	767,871	0	0.00%	57,129	533,197	2,069	15,118
8	767,871	0	0.00%	27,811	559,984	1,572	16,077
9	767,871	0	0.00%	70,592	193,855	1,343	15,532

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

Population Summary

Wednesday, June 3, 2026

6:51 PM

District	Population	Deviation	% Devn.	[% AP_BlK]	[% Hispanic Origin]	[% NH_Wht]	[% NH_Ind]	[% NH_Asn]
1	767,871	0	0.00%	3.25%	4.86%	87.87%	0.24%	0.82%
2	767,871	0	0.00%	7.26%	5.41%	82.12%	0.22%	1.81%
3	767,871	0	0.00%	11.47%	5.78%	77.81%	0.24%	1.49%
4	767,872	1	0.00%	10.98%	8.06%	75.86%	0.26%	1.95%
5	767,871	0	0.00%	13.4%	10.3%	69.18%	0.18%	4.22%
6	767,871	0	0.00%	10.39%	7.73%	77.7%	0.23%	1.11%
7	767,871	0	0.00%	18.01%	7.44%	69.44%	0.27%	1.97%
8	767,871	0	0.00%	18.76%	3.62%	72.93%	0.2%	2.09%
9	767,871	0	0.00%	62.25%	9.19%	25.25%	0.17%	2.02%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range:	767,871 to 767,872
Ratio Range:	0.00
Absolute Range:	0 to 1
Absolute Overall Range:	1
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.11
Relative Mean Deviation:	0.00%
Standard Deviation:	0.31

User: Tony Fairfax

Plan Name: TN CD 2022

Plan Type: TN Cong Dist

Population Summary

Friday, May 15, 2026

8:46 PM

District	Population	Deviation	% Devn.	[18+_Pop]	[H18+_Pop]	[NH18+_Wht]	[NH18+_Ind]	[NH18+_Asn]
1	767,871	0	0.00%	616,550	23,185	552,337	1,545	4,989
2	767,871	0	0.00%	609,503	26,468	513,806	1,409	11,140
3	767,871	0	0.00%	607,013	28,002	485,954	1,508	9,031
4	767,872	1	0.00%	587,445	38,964	461,084	1,613	11,400
5	767,871	0	0.00%	582,505	51,058	418,881	1,133	23,391
6	767,871	0	0.00%	603,423	38,463	483,180	1,535	6,851
7	767,871	0	0.00%	597,796	37,116	429,888	1,661	12,619
8	767,871	0	0.00%	597,005	17,498	447,346	1,269	11,622
9	767,871	0	0.00%	583,233	44,963	165,820	1,072	12,882

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

Population Summary

Wednesday, June 3, 2026

6:53 PM

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+ _AP_Blkl	[% H18+ _Pop]	[% NH18+ _Whl]	[% NH18+ _Ind]	[% NH18+ _Asn]
1	767,871	0	0.00%	616,550	2.74%	3.76%	89.59%	0.25%	0.81%
2	767,871	0	0.00%	609,503	6.3%	4.34%	84.3%	0.23%	1.83%
3	767,871	0	0.00%	607,013	10.49%	4.61%	80.06%	0.25%	1.49%
4	767,872	1	0.00%	587,445	9.86%	6.63%	78.49%	0.27%	1.94%
5	767,871	0	0.00%	582,505	12.67%	8.77%	71.91%	0.19%	4.02%
6	767,871	0	0.00%	603,423	9.4%	6.37%	80.07%	0.25%	1.14%
7	767,871	0	0.00%	597,796	16.68%	6.21%	71.91%	0.28%	2.11%
8	767,871	0	0.00%	597,005	17.72%	2.93%	74.93%	0.21%	1.95%
9	767,871	0	0.00%	583,233	60.32%	7.71%	28.43%	0.18%	2.21%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2022

Plan Type: TN Cong Dist

Population Summary

Wednesday, June 3, 2026

8:10 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	CVAP_BLK24	CVAP_HSP24	CVAP_WHT24	CVAP_AMI24	CVAP_ASI24
1	767,871	0	0.00%	614,561	17,074	15,671	570,132	559	3,671
2	767,871	0	0.00%	610,063	38,095	17,561	538,355	406	7,329
3	767,871	0	0.00%	605,425	64,269	18,887	507,503	484	6,730
4	767,872	1	0.00%	585,321	61,369	23,905	481,129	517	9,727
5	767,871	0	0.00%	557,659	75,695	27,787	431,530	491	14,072
6	767,871	0	0.00%	596,568	55,772	22,236	504,126	611	5,120
7	767,871	0	0.00%	590,790	100,522	28,069	441,771	852	8,659
8	767,871	0	0.00%	581,023	103,958	12,916	445,861	1,035	7,720
9	767,871	0	0.00%	534,171	347,643	18,673	155,520	406	7,606

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range:	767,871 to 767,872
Ratio Range:	0.00
Absolute Range:	0 to 1
Absolute Overall Range:	1
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.11
Relative Mean Deviation:	0.00%
Standard Deviation:	0.31

Population Summary

Wednesday, June 3, 2026

6:54 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	[% CVAP_BLK24]	[% CVAP_HSP24]	[% CVAP_WHT24]	[% CVAP_AMI24]	[% CVAP_ASI24]
1	767,871	0	0.00%	614,561	2.78%	2.55%	92.77%	0.09%	0.6%
2	767,871	0	0.00%	610,063	6.24%	2.88%	88.25%	0.07%	1.2%
3	767,871	0	0.00%	605,425	10.62%	3.12%	83.83%	0.08%	1.11%
4	767,872	1	0.00%	585,321	10.48%	4.08%	82.2%	0.09%	1.66%
5	767,871	0	0.00%	557,659	13.57%	4.98%	77.38%	0.09%	2.52%
6	767,871	0	0.00%	596,568	9.35%	3.73%	84.5%	0.1%	0.86%
7	767,871	0	0.00%	590,790	17.01%	4.75%	74.78%	0.14%	1.47%
8	767,871	0	0.00%	581,023	17.89%	2.22%	76.74%	0.18%	1.33%
9	767,871	0	0.00%	534,171	65.08%	3.5%	29.11%	0.08%	1.42%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2022

Plan Type: TN Cong Dist

Population Summary

Wednesday, June 3, 2026

6:57 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	CVAP_BLA24	CVAP_BLW24	CVAP_AIB24	CVAP_BLK24
1	767,871	0	0.00%	614,561	13,177	3,704	201	17,074
2	767,871	0	0.00%	610,063	32,769	4,871	447	38,095
3	767,871	0	0.00%	605,425	58,165	5,304	798	64,269
4	767,872	1	0.00%	585,321	54,350	6,659	361	61,369
5	767,871	0	0.00%	557,659	70,334	4,683	648	75,695
6	767,871	0	0.00%	596,568	51,741	3,504	539	55,772
7	767,871	0	0.00%	590,790	93,362	6,225	955	100,522
8	767,871	0	0.00%	581,023	99,360	4,189	415	103,958
9	767,871	0	0.00%	534,171	342,421	3,828	1,387	347,643

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

Population Summary

Wednesday, June 3, 2026

6:58 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	[% CVAP_BLA24]	[% CVAP_BWL24]	[% CVAP_AIB24]	[% CVAP_BLK24]
1	767,871	0	0.00%	614,561	2.14%	0.6%	0.03%	2.78%
2	767,871	0	0.00%	610,063	5.37%	0.8%	0.07%	6.24%
3	767,871	0	0.00%	605,425	9.61%	0.88%	0.13%	10.62%
4	767,872	1	0.00%	585,321	9.29%	1.14%	0.06%	10.48%
5	767,871	0	0.00%	557,659	12.61%	0.84%	0.12%	13.57%
6	767,871	0	0.00%	596,568	8.67%	0.59%	0.09%	9.35%
7	767,871	0	0.00%	590,790	15.8%	1.05%	0.16%	17.01%
8	767,871	0	0.00%	581,023	17.1%	0.72%	0.07%	17.89%
9	767,871	0	0.00%	534,171	64.1%	0.72%	0.26%	65.08%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

Contiguity Report

Friday, May 15, 2026

8:46 PM

District	Number of Distinct Areas
1	1
2	4
3	1
4	1
5	1
6	1
7	1
8	1
9	1

Measures of Compactness Report

Friday, May 15, 2026

8:46 PM

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.27	0.12
Max	0.58	0.29
Mean	0.36	0.20
Std. Dev.	0.10	0.07

District	Reock	Polsby-Popper
1	0.32	0.27
2	0.41	0.17
3	0.34	0.15
4	0.27	0.19
5	0.28	0.13
6	0.37	0.25
7	0.40	0.27
8	0.58	0.29
9	0.29	0.12

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

Political Subdivision Splits Between Districts

Friday, May 15, 2026

8:46 PM

Number of subdivisions not split:

County	85
Voting District	1,900

Number of subdivisions split into more than one district:

County	10
Voting District	65

Number of splits involving no population:

County	0
Voting District	8

Split Counts

County

Cases where an area is split among 2 Districts: 9

Cases where an area is split among 3 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 65

County	Voting District	District	Population
<i>Split Counties:</i>			
Benton TN		7	10,472
Benton TN		8	5,392
Campbell TN		2	20,741
Campbell TN		3	18,531
Davidson TN		5	346,457
Davidson TN		6	188,668
Davidson TN		7	180,759
Jefferson TN		1	52,062
Jefferson TN		2	2,621
Scott TN		3	5,881
Scott TN		6	15,969
Shelby TN		8	192,467
Shelby TN		9	737,277
Tipton TN		8	30,376
Tipton TN		9	30,594
Warren TN		4	40,468
Warren TN		6	485
Williamson TN		5	161,233
Williamson TN		7	86,493
Wilson TN		5	112,307
Wilson TN		6	35,430
<i>Split VTDs:</i>			
Benton TN	3 Benton Co. Courthouse	7	2,616

Political Subdivision Splits Between Districts

TN CD 2022

County	Voting District	District	Population
Benton TN	3 Benton Co. Courthouse	8	21
Benton TN	5 Benton Co. Courthouse	7	2
Benton TN	5 Benton Co. Courthouse	8	2,770
Campbell TN	College Hill	2	47
Campbell TN	College Hill	3	847
Campbell TN	East LaFollette	2	3,360
Campbell TN	East LaFollette	3	230
Campbell TN	West LaFollette	2	98
Campbell TN	West LaFollette	3	2,173
Davidson TN	10-1	6	1,566
Davidson TN	10-1	7	3
Davidson TN	10-4	6	5,765
Davidson TN	10-4	7	97
Davidson TN	14-2	5	3,228
Davidson TN	14-2	6	2,661
Davidson TN	14-3	5	0
Davidson TN	14-3	6	1,830
Davidson TN	16-1	6	2,659
Davidson TN	16-1	7	0
Davidson TN	16-3	5	1,762
Davidson TN	16-3	6	11,818
Davidson TN	2-3	6	0
Davidson TN	2-3	7	3,163
Davidson TN	24-1	5	88
Davidson TN	24-1	7	4,348
Davidson TN	24-2	5	2,007
Davidson TN	24-2	7	1,091
Davidson TN	28-1	5	6,254
Davidson TN	28-1	6	1,337
Davidson TN	28-3	5	7,187
Davidson TN	28-3	6	43
Davidson TN	29-1	5	1,933
Davidson TN	29-1	6	1,008
Davidson TN	29-4	5	7,494
Davidson TN	29-4	6	103
Davidson TN	3-1	6	35
Davidson TN	3-1	7	2,072
Davidson TN	5-1	6	3,457
Davidson TN	5-1	7	18
Davidson TN	8-3	6	5,911
Davidson TN	8-3	7	676
Davidson TN	8-4	6	3,937
Davidson TN	8-4	7	1,292
Jefferson TN	6th Rush Strong School	1	2,155
Jefferson TN	6th Rush Strong School	2	2,621
Scott TN	1-1 Fairview	3	3,075
Scott TN	1-1 Fairview	6	121

Political Subdivision Splits Between Districts

TN CD 2022

County	Voting District	District	Population
Scott TN	2-1 Elgin	3	1,243
Scott TN	2-1 Elgin	6	39
Scott TN	2-2 Robbins	3	1,544
Scott TN	2-2 Robbins	6	11
Scott TN	3-1 Huntsville	3	13
Scott TN	3-1 Huntsville	6	2,124
Scott TN	5-1 Pine Hill	3	6
Scott TN	5-1 Pine Hill	6	1,165
Shelby TN	Bartlett 04	8	0
Shelby TN	Bartlett 04	9	6,659
Shelby TN	Bartlett 06	8	1,396
Shelby TN	Bartlett 06	9	3,683
Shelby TN	Bartlett 08	8	3,283
Shelby TN	Bartlett 08	9	3,778
Shelby TN	Bartlett 09	8	2,974
Shelby TN	Bartlett 09	9	3,326
Shelby TN	Brunswick 2	8	3,205
Shelby TN	Brunswick 2	9	3,725
Shelby TN	Collierville 2	8	8,680
Shelby TN	Collierville 2	9	0
Shelby TN	Collierville 7	8	4,795
Shelby TN	Collierville 7	9	1,519
Shelby TN	Forest Hills 1	8	1,628
Shelby TN	Forest Hills 1	9	3,058
Shelby TN	Germantown 02	8	5,939
Shelby TN	Germantown 02	9	0
Shelby TN	Germantown 06	8	3,254
Shelby TN	Germantown 06	9	1,103
Shelby TN	Lakeland 2	8	4,019
Shelby TN	Lakeland 2	9	0
Shelby TN	Memphis 44-1	8	744
Shelby TN	Memphis 44-1	9	5,167
Shelby TN	Memphis 46-2	8	155
Shelby TN	Memphis 46-2	9	7,502
Shelby TN	Memphis 54	8	456
Shelby TN	Memphis 54	9	13,090
Shelby TN	Memphis 57	8	4,770
Shelby TN	Memphis 57	9	1,189
Shelby TN	Memphis 68-1	8	3,241
Shelby TN	Memphis 68-1	9	3,659
Shelby TN	Memphis 81-1	8	3,402
Shelby TN	Memphis 81-1	9	1,930
Shelby TN	Memphis 81-3	8	3,992
Shelby TN	Memphis 81-3	9	118
Shelby TN	Memphis 81-5	8	68
Shelby TN	Memphis 81-5	9	5,166
Shelby TN	Memphis 95-1	8	0

Political Subdivision Splits Between Districts

TN CD 2022

County	Voting District	District	Population
Shelby TN	Memphis 95-1	9	9,030
Shelby TN	Millington 2	8	1,273
Shelby TN	Millington 2	9	8,023
Shelby TN	Stewartville	8	5,682
Shelby TN	Stewartville	9	84
Tipton TN	01 N. E. Covington	8	1,312
Tipton TN	01 N. E. Covington	9	5,112
Tipton TN	03 S.E. Covington	8	6,158
Tipton TN	03 S.E. Covington	9	223
Tipton TN	21 W. Wilkinsville	8	2,173
Tipton TN	21 W. Wilkinsville	9	4,878
Tipton TN	22 Brighton	8	5,312
Tipton TN	22 Brighton	9	1,137
Warren TN	07-1 Friendship The Baptist Church	4	2,733
Warren TN	07-1 Friendship The Baptist Church	6	485
Williamson TN	9-3 Westhaven Clubhouse	5	953
Williamson TN	9-3 Westhaven Clubhouse	7	6,827
Williamson TN	9-4 Grace Chapel Church	5	2
Williamson TN	9-4 Grace Chapel Church	7	2,766
Wilson TN	19-1	5	5,572
Wilson TN	19-1	6	614
Wilson TN	20-1	5	2,792
Wilson TN	20-1	6	2,259
Wilson TN	21-2	5	178
Wilson TN	21-2	6	1,493
Wilson TN	22-1	5	4,706
Wilson TN	22-1	6	878
Wilson TN	25-1	5	5,726
Wilson TN	25-1	6	17
Wilson TN	4-1	5	2,724
Wilson TN	4-1	6	3,545
Wilson TN	5-1	5	1,559
Wilson TN	5-1	6	5,180
Wilson TN	7-1	5	548
Wilson TN	7-1	6	1,295

Communities of Interest (Landscape, 11x8.5)

Friday, May 15, 2026

10:07 PM

Census Place	District	Population	%
Atoka Town	8	10,001	99.9
Atoka Town	9	7	0.1
Bartlett City	8	29,142	50.4
Bartlett City	9	28,644	49.6
Bean Station City	1	11	0.4
Bean Station City	2	2,956	99.6
Brentwood City	5	44,674	98.5
Brentwood City	7	699	1.5
Brighton Town	8	2,451	84.9
Brighton Town	9	437	15.1
Camden City	7	790	21.5
Camden City	8	2,884	78.5
Collierville Town	8	48,196	93.9
Collierville Town	9	3,128	6.1
Covington City	8	4,626	53.4
Covington City	9	4,037	46.6
Eagleville City	4	813	100.0
Eagleville City	5	0	0.0
Franklin City	5	24,245	29.1
Franklin City	7	59,209	71.0
Goodlettsville City	6	17,692	99.5

Communities of Interest (Landscape, 11x8.5)

TN CD 2022

Census Place	District	Population	%
Goodlettsville City	7	97	0.6
Greenvale CDP	5	31	39.2
Greenvale CDP	6	48	60.8
Huntsville Town	3	30	2.4
Huntsville Town	6	1,240	97.6
La Follette City	2	3,695	49.7
La Follette City	3	3,735	50.3
Lakeland City	8	13,904	100.0
Lakeland City	9	0	0.0
Lebanon City	5	35,843	93.3
Lebanon City	6	2,588	6.7
Memphis City	8	34,375	5.4
Memphis City	9	598,729	94.6
Millersville City	6	4,951	78.6
Millersville City	7	1,348	21.4
Mount Juliet City	5	38,300	97.5
Mount Juliet City	6	989	2.5
Nashville-Davidson metropolitan governme	5	333,627	48.4
Nashville-Davidson metropolitan governme	6	177,283	25.7
Nashville-Davidson metropolitan governme	7	178,537	25.9
Petersburg Town	4	371	70.3
Petersburg Town	5	157	29.7
Portland City	6	13,113	99.7

Communities of Interest (Landscape, 11x8.5)

TN CD 2022

Census Place	District	Population	%
Portland City	7	43	0.3
Rarity Bay CDP	2	393	44.4
Rarity Bay CDP	3	492	55.6
Ridgetop City	6	47	2.2
Ridgetop City	7	2,108	97.8
Scotts Hill Town	7	311	35.5
Scotts Hill Town	8	566	64.5
Seymour CDP	1	11,928	81.1
Seymour CDP	2	2,777	18.9
Smyrna Town	4	53,070	100.0
Smyrna Town	5	0	0.0
Strawberry Plains CDP	1	81	3.4
Strawberry Plains CDP	2	2,324	96.6
Thompson's Station Town	5	5,124	68.5
Thompson's Station Town	7	2,361	31.5
Vonore Town	2	0	0.0
Vonore Town	3	1,574	100.0
White House City	6	6,790	52.3
White House City	7	6,192	47.7

Census Place	-- Listed by District	
	Population	%
Bean Station City (part)	11	0.4
Seymour CDP (part)	11,928	81.1
Strawberry Plains CDP (part)	81	3.4
District 1 Totals	375,106	
La Follette City (part)	3,695	49.7
Rarity Bay CDP (part)	393	44.4
Seymour CDP (part)	2,777	18.9
Strawberry Plains CDP (part)	2,324	96.6
Vonore Town (part)	0	0.0
District 2 Totals	361,885	
Huntsville Town (part)	30	2.4
La Follette City (part)	3,735	50.3
Rarity Bay CDP (part)	492	55.6
District 3 Totals	472,710	
Petersburg Town (part)	371	70.3
District 4 Totals	434,805	

Communities of Interest (Landscape, 11x8.5)

TN CD 2022

	Population	%
Brentwood City (part)	44,674	98.5
Eagleville City (part)	0	0.0
Franklin City (part)	24,245	29.1
Greenville CDP (part)	31	39.2
Lebanon City (part)	35,843	93.3
Mount Juliet City (part)	38,300	97.5
Nashville-Davidson metropolitan governme (part)	333,627	48.4
Petersburg Town (part)	157	29.7
Smyrna Town (part)	0	0.0
Thompson's Station Town (part)	5,124	68.5
District 5 Totals	633,942	
Goodlettsville City (part)	17,692	99.5
Greenville CDP (part)	48	60.8
Huntsville Town (part)	1,240	97.6
Lebanon City (part)	2,588	6.7
Millersville City (part)	4,951	78.6
Mount Juliet City (part)	989	2.5
Nashville-Davidson metropolitan governme (part)	177,283	25.7
Ridgetop City (part)	47	2.2
White House City (part)	6,790	52.3
District 6 Totals	472,453	

Communities of Interest (Landscape, 11x8.5)

TN CD 2022

	Population	%
Brentwood City (part)	699	1.5
Camden City (part)	790	21.5
Franklin City (part)	59,209	71.0
Goodlettsville City (part)	97	0.6
Millersville City (part)	1,348	21.4
Nashville-Davidson metropolitan governme (part)	178,537	25.9
Portland City (part)	43	0.3
Ridgetop City (part)	2,108	97.8
Scotts Hill Town (part)	311	35.5
Thompson's Station Town (part)	2,361	31.5
White House City (part)	6,192	47.7
District 7 Totals	532,358	
Bartlett City (part)	29,142	50.4
Brighton Town (part)	2,451	84.9
Camden City (part)	2,884	78.5
Collierville Town (part)	48,196	93.9
Covington City (part)	4,626	53.4
Memphis City (part)	34,375	5.4
Scotts Hill Town (part)	566	64.5
District 8 Totals	491,457	

Communities of Interest (Landscape, 11x8.5)

TN CD 2022

	Population	%
Atoka Town (part)	7	0.1
Bartlett City (part)	28,644	49.6
Brighton Town (part)	437	15.1
Collierville Town (part)	3,128	6.1
Covington City (part)	4,037	46.6
Lakeland City (part)	0	0.0
Memphis City (part)	598,729	94.6
District 9 Totals	653,256	

Summary Statistics

Number of Census Place not split	469
Number of Census Place split	33
Number of Census Place split in 2	32
Number of Census Place split in 3	1
Total number of splits	67

County by District and by County

Monday, May 18, 2026

4:24 PM

	Population	% of District
District 1		
Carter	56,356	100.00%
Cocke	35,999	100.00%
Greene	70,152	100.00%
Hamblen	64,499	100.00%
Hancock	6,662	100.00%
Hawkins	56,721	100.00%
Jefferson	52,062	95.21%
Johnson	17,948	100.00%
Sevier	98,380	100.00%
Sullivan	158,163	100.00%
Unicoi	17,928	100.00%
Washington	133,001	100.00%
Total District 1	767,871	
District 2		
Blount	135,280	100.00%
Campbell	20,741	52.81%
Claiborne	32,043	100.00%
Grainger	23,527	100.00%
Jefferson	2,621	4.79%
Knox	478,971	100.00%
Loudon	54,886	100.00%
Union	19,802	100.00%
Total District 2	767,871	
District 3		
Anderson	77,123	100.00%
Bradley	108,620	100.00%
Campbell	18,531	47.19%
Hamilton	366,207	100.00%
McMinn	53,276	100.00%
Monroe	46,250	100.00%
Morgan	21,035	100.00%
Polk	17,544	100.00%
Roane	53,404	100.00%
Scott	5,881	26.92%
Total District 3	767,871	
District 4		
Bedford	50,237	100.00%
Bledsoe	14,913	100.00%

	Population	% of District
Coffee	57,889	100.00%
Franklin	42,774	100.00%
Giles	30,346	100.00%
Grundy	13,529	100.00%
Lawrence	44,159	100.00%
Lincoln	35,319	100.00%
Marion	28,837	100.00%
Meigs	12,758	100.00%
Moore	6,461	100.00%
Rhea	32,870	100.00%
Rutherford	341,486	100.00%
Sequatchie	15,826	100.00%
Warren	40,468	98.82%
Total District 4	767,872	
District 5		
Davidson	346,457	48.40%
Lewis	12,582	100.00%
Marshall	34,318	100.00%
Maury	100,974	100.00%
Williamson	161,233	65.09%
Wilson	112,307	76.02%
Total District 5	767,871	
District 6		
Cannon	14,506	100.00%
Clay	7,581	100.00%
Cumberland	61,145	100.00%
Davidson	188,668	26.35%
DeKalb	20,080	100.00%
Fentress	18,489	100.00%
Jackson	11,617	100.00%
Macon	25,216	100.00%
Overton	22,511	100.00%
Pickett	5,001	100.00%
Putnam	79,854	100.00%
Scott	15,969	73.08%
Smith	19,904	100.00%
Sumner	196,281	100.00%
Trousdale	11,615	100.00%
Van Buren	6,168	100.00%
Warren	485	1.18%
White	27,351	100.00%
Wilson	35,430	23.98%
Total District 6	767,871	

	Population	% of District
District 7		
Benton	10,472	66.01%
Cheatham	41,072	100.00%
Davidson	180,759	25.25%
Decatur	11,435	100.00%
Dickson	54,315	100.00%
Hickman	24,925	100.00%
Houston	8,283	100.00%
Humphreys	18,990	100.00%
Montgomery	220,069	100.00%
Perry	8,366	100.00%
Robertson	72,803	100.00%
Stewart	13,657	100.00%
Wayne	16,232	100.00%
Williamson	86,493	34.91%
Total District 7	767,871	
District 8		
Benton	5,392	33.99%
Carroll	28,440	100.00%
Chester	17,341	100.00%
Crockett	13,911	100.00%
Dyer	36,801	100.00%
Fayette	41,990	100.00%
Gibson	50,429	100.00%
Hardeman	25,462	100.00%
Hardin	26,831	100.00%
Haywood	17,864	100.00%
Henderson	27,842	100.00%
Henry	32,199	100.00%
Lake	7,005	100.00%
Lauderdale	25,143	100.00%
Madison	98,823	100.00%
McNairy	25,866	100.00%
Obion	30,787	100.00%
Shelby	192,467	20.70%
Tipton	30,376	49.82%
Weakley	32,902	100.00%
Total District 8	767,871	
District 9		
Shelby	737,277	79.30%
Tipton	30,594	50.18%
Total District 9	767,871	

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Saturday, May 9, 2026

10:33 AM

District	Population	Deviation	% Devn.	AP_Bl	[Hispanic Origin]	NH_Wht	NH_Ind	NH_Asn
1	767,871	0	0.00%	24,950	37,332	674,765	1,848	6,317
2	767,871	0	0.00%	55,736	41,552	630,609	1,705	13,874
3	767,871	0	0.00%	88,022	45,941	595,695	1,917	11,517
4	767,871	0	0.00%	127,933	100,984	492,688	1,670	24,355
5	767,871	0	0.00%	224,855	43,125	470,378	1,914	9,870
6	767,871	0	0.00%	89,498	50,988	590,253	1,789	13,933
7	767,871	0	0.00%	119,509	53,522	556,416	1,847	13,962
8	767,871	0	0.00%	214,948	53,788	460,793	1,428	20,048
9	767,872	1	0.00%	250,663	51,955	428,649	1,421	20,426

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Saturday, May 9, 2026

10:35 AM

District	Population	Deviation	% Devn.	[% AP_BlK]	[% Hispanic Origin]	[% NH_Wht]	[% NH_Ind]	[% NH_Asn]
1	767,871	0	0.00%	3.25%	4.86%	87.87%	0.24%	0.82%
2	767,871	0	0.00%	7.26%	5.41%	82.12%	0.22%	1.81%
3	767,871	0	0.00%	11.46%	5.98%	77.58%	0.25%	1.5%
4	767,871	0	0.00%	16.66%	13.15%	64.16%	0.22%	3.17%
5	767,871	0	0.00%	29.28%	5.62%	61.26%	0.25%	1.29%
6	767,871	0	0.00%	11.66%	6.64%	76.87%	0.23%	1.81%
7	767,871	0	0.00%	15.56%	6.97%	72.46%	0.24%	1.82%
8	767,871	0	0.00%	27.99%	7%	60.01%	0.19%	2.61%
9	767,872	1	0.00%	32.64%	6.77%	55.82%	0.19%	2.66%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Saturday, May 9, 2026

10:33 AM

District	Population	Deviation	% Devn.	[18+_Pop]	[18+_AP_Black]	[H18+_Pop]	[NH18+_Wht]	[NH18+_Ind]	[NH18+_Asn]
1	767,871	0	0.00%	616,550	16,903	23,185	552,337	1,545	4,989
2	767,871	0	0.00%	609,512	38,406	26,464	513,810	1,409	11,140
3	767,871	0	0.00%	606,482	63,327	28,990	484,588	1,559	9,101
4	767,871	0	0.00%	586,518	91,453	65,271	395,002	1,376	18,267
5	767,871	0	0.00%	586,652	163,517	27,649	373,255	1,507	7,725
6	767,871	0	0.00%	614,497	65,220	33,671	485,740	1,546	11,661
7	767,871	0	0.00%	593,732	85,320	34,363	444,772	1,493	11,041
8	767,871	0	0.00%	590,123	156,789	33,646	370,795	1,170	15,446
9	767,872	1	0.00%	580,407	183,802	32,478	337,997	1,140	14,555

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Saturday, May 9, 2026

10:35 AM

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+ _AP_Blkl	[% H18+ _Pop]	[% NH18+ _Wht]	[% NH18+ _Ind]	[% NH18+ _Asn]
1	767,871	0	0.00%	616,550	2.74%	3.76%	89.59%	0.25%	0.81%
2	767,871	0	0.00%	609,512	6.3%	4.34%	84.3%	0.23%	1.83%
3	767,871	0	0.00%	606,482	10.44%	4.78%	79.9%	0.26%	1.5%
4	767,871	0	0.00%	586,518	15.59%	11.13%	67.35%	0.23%	3.11%
5	767,871	0	0.00%	586,652	27.87%	4.71%	63.62%	0.26%	1.32%
6	767,871	0	0.00%	614,497	10.61%	5.48%	79.05%	0.25%	1.9%
7	767,871	0	0.00%	593,732	14.37%	5.79%	74.91%	0.25%	1.86%
8	767,871	0	0.00%	590,123	26.57%	5.7%	62.83%	0.2%	2.62%
9	767,872	1	0.00%	580,407	31.67%	5.6%	58.23%	0.2%	2.51%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872

Ratio Range: 0.00

Absolute Range: 0 to 1

Absolute Overall Range: 1

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.11

Relative Mean Deviation: 0.00%

Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Saturday, May 9, 2026

10:53 AM

District	Population	Deviation	% Devn.	CVAP_TOT24	CVAP_BLK24	CVAP_HSP24	CVAP_WHT24	CVAP_AMI24	CVAP_ASI24
1	767,871	0	0.00%	614,561	17,074	15,671	570,132	559	3,671
2	767,871	0	0.00%	610,078	38,104	17,564	538,356	406	7,332
3	767,871	0	0.00%	604,647	64,366	19,393	506,018	480	6,832
4	767,871	0	0.00%	552,488	92,119	30,308	407,877	616	12,833
5	767,871	0	0.00%	577,251	159,428	19,063	384,710	863	5,653
6	767,871	0	0.00%	606,822	66,869	21,155	501,863	424	7,347
7	767,871	0	0.00%	590,267	85,979	26,873	459,260	668	8,247
8	767,871	0	0.00%	556,309	160,657	18,014	358,448	714	10,636
9	767,872	1	0.00%	563,158	179,801	17,664	349,263	631	8,083

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range:	767,871 to 767,872
Ratio Range:	0.00
Absolute Range:	0 to 1
Absolute Overall Range:	1
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.11
Relative Mean Deviation:	0.00%
Standard Deviation:	0.31

Population Summary

Saturday, May 9, 2026

10:54 AM

District	Population	Deviation	% Devn.	CVAP_TOT24	[% CVAP_BLK24]	[% CVAP_HSP24]	[% CVAP_WHT24]	[% CVAP_AMI24]	[% CVAP_ASI24]
1	767,871	0	0.00%	614,561	2.78%	2.55%	92.77%	0.09%	0.6%
2	767,871	0	0.00%	610,078	6.25%	2.88%	88.24%	0.07%	1.2%
3	767,871	0	0.00%	604,647	10.65%	3.21%	83.69%	0.08%	1.13%
4	767,871	0	0.00%	552,488	16.67%	5.49%	73.83%	0.11%	2.32%
5	767,871	0	0.00%	577,251	27.62%	3.3%	66.65%	0.15%	0.98%
6	767,871	0	0.00%	606,822	11.02%	3.49%	82.7%	0.07%	1.21%
7	767,871	0	0.00%	590,267	14.57%	4.55%	77.81%	0.11%	1.4%
8	767,871	0	0.00%	556,309	28.88%	3.24%	64.43%	0.13%	1.91%
9	767,872	1	0.00%	563,158	31.93%	3.14%	62.02%	0.11%	1.44%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Population Summary

Wednesday, June 3, 2026

8:16 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	CVAP_BLA24	CVAP_BLW24	CVAP_AIB24	CVAP_BLK24
1	767,871	0	0.00%	614,561	13,177	3,704	201	17,074
2	767,871	0	0.00%	610,078	32,786	4,871	447	38,104
3	767,871	0	0.00%	604,647	57,971	5,602	793	64,366
4	767,871	0	0.00%	552,488	85,536	6,178	413	92,119
5	767,871	0	0.00%	577,251	153,643	4,702	1,008	159,428
6	767,871	0	0.00%	606,822	62,437	4,014	414	66,869
7	767,871	0	0.00%	590,267	79,986	5,173	850	85,979
8	767,871	0	0.00%	556,309	155,743	4,059	752	160,657
9	767,872	1	0.00%	563,158	174,400	4,664	873	179,801

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range:	767,871 to 767,872
Ratio Range:	0.00
Absolute Range:	0 to 1
Absolute Overall Range:	1
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.11
Relative Mean Deviation:	0.00%
Standard Deviation:	0.31

Population Summary

Wednesday, June 3, 2026

8:18 PM

District	Population	Deviation	% Devn.	CVAP_TOT24	[% CVAP_BLA24]	[% CVAP_BWL24]	[% CVAP_AIB24]	[% CVAP_BLK24]
1	767,871	0	0.00%	614,561	2.14%	0.6%	0.03%	2.78%
2	767,871	0	0.00%	610,078	5.37%	0.8%	0.07%	6.25%
3	767,871	0	0.00%	604,647	9.59%	0.93%	0.13%	10.65%
4	767,871	0	0.00%	552,488	15.48%	1.12%	0.07%	16.67%
5	767,871	0	0.00%	577,251	26.62%	0.81%	0.17%	27.62%
6	767,871	0	0.00%	606,822	10.29%	0.66%	0.07%	11.02%
7	767,871	0	0.00%	590,267	13.55%	0.88%	0.14%	14.57%
8	767,871	0	0.00%	556,309	28%	0.73%	0.14%	28.88%
9	767,872	1	0.00%	563,158	30.97%	0.83%	0.16%	31.93%

Total Population: 6,910,840

Ideal District Population: 767,871

Summary Statistics:

Population Range: 767,871 to 767,872
Ratio Range: 0.00
Absolute Range: 0 to 1
Absolute Overall Range: 1
Relative Range: 0.00% to 0.00%
Relative Overall Range: 0.00%
Absolute Mean Deviation: 0.11
Relative Mean Deviation: 0.00%
Standard Deviation: 0.31

Contiguity Report

Friday, May 15, 2026

8:48 PM

District	Number of Distinct Areas
1	1
2	4
3	1
4	1
5	1
6	1
7	1
8	1
9	1

Measures of Compactness Report

Friday, May 15, 2026

8:48 PM

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.17	0.09
Max	0.43	0.27
Mean	0.31	0.20
Std. Dev.	0.09	0.06

District	Reock	Polsby-Popper
1	0.32	0.27
2	0.41	0.17
3	0.32	0.20
4	0.43	0.25
5	0.20	0.09
6	0.30	0.24
7	0.33	0.25
8	0.35	0.20
9	0.17	0.14

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

Political Subdivision Splits Between Districts

Friday, May 15, 2026

8:48 PM

Number of subdivisions not split:

County	83
Voting District	1,883

Number of subdivisions split into more than one district:

County	12
Voting District	82

Number of splits involving no population:

County	0
Voting District	22

Split Counts

County

Cases where an area is split among 2 Districts: 10

Cases where an area is split among 3 Districts: 2

Voting District

Cases where an area is split among 2 Districts: 81

Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties:</i>			
Campbell TN		2	20,741
Campbell TN		6	18,531
Davidson TN		4	230,071
Davidson TN		6	269,299
Davidson TN		7	216,514
Fayette TN		8	16,936
Fayette TN		9	25,054
Jefferson TN		1	52,062
Jefferson TN		2	2,621
Maury TN		5	68,162
Maury TN		9	32,812
Montgomery TN		5	54,309
Montgomery TN		7	165,760
Rhea TN		3	32,689
Rhea TN		6	181
Rutherford TN		4	302,405
Rutherford TN		9	39,081
Shelby TN		5	221,035
Shelby TN		8	440,132
Shelby TN		9	268,577
Sumner TN		6	15,705
Sumner TN		7	180,576
Tipton TN		5	24,618

Political Subdivision Splits Between Districts

TN CD 2026

County	Voting District	District	Population
Tipton TN		8	36,352
Williamson TN		5	140,609
Williamson TN		9	107,117
<i>Split VTDs:</i>			
Campbell TN	East LaFollette	2	3,500
Campbell TN	East LaFollette	6	90
Campbell TN	West LaFollette	2	5
Campbell TN	West LaFollette	6	2,266
Davidson TN	10-3	6	2,967
Davidson TN	10-3	7	2,606
Davidson TN	10-6	6	2,105
Davidson TN	10-6	7	680
Davidson TN	12-2	4	7,236
Davidson TN	12-2	6	0
Davidson TN	13-1	4	7,229
Davidson TN	13-1	6	0
Davidson TN	13-4	4	608
Davidson TN	13-4	6	0
Davidson TN	14-1	4	1,562
Davidson TN	14-1	6	6,199
Davidson TN	14-5	4	37
Davidson TN	14-5	6	5,422
Davidson TN	15-5	4	2,653
Davidson TN	15-5	6	0
Davidson TN	16-3	4	10,053
Davidson TN	16-3	6	3,527
Davidson TN	17-5	4	0
Davidson TN	17-5	6	976
Davidson TN	17-5	7	0
Davidson TN	18-5	6	0
Davidson TN	18-5	7	133
Davidson TN	19-1	6	6,820
Davidson TN	19-1	7	1,991
Davidson TN	19-3	6	2,619
Davidson TN	19-3	7	3,197
Davidson TN	19-5	4	0
Davidson TN	19-5	6	3,405
Davidson TN	20-1	6	493
Davidson TN	20-1	7	1,641
Davidson TN	20-2	6	4,117
Davidson TN	20-2	7	555
Davidson TN	20-3	6	7,234
Davidson TN	20-3	7	5,121
Davidson TN	21-2	6	3,126
Davidson TN	21-2	7	2,494
Davidson TN	2-2	6	1,993
Davidson TN	2-2	7	4,078

Political Subdivision Splits Between Districts

TN CD 2026

County	Voting District	District	Population
Davidson TN	2-3	6	1,181
Davidson TN	2-3	7	1,982
Davidson TN	23-1	6	434
Davidson TN	23-1	7	4,199
Davidson TN	23-4	6	0
Davidson TN	23-4	7	2,901
Davidson TN	24-6	6	0
Davidson TN	24-6	7	4,590
Davidson TN	27-2	4	4,891
Davidson TN	27-2	7	56
Davidson TN	27-3	4	6,477
Davidson TN	27-3	7	26
Davidson TN	33-1	4	682
Davidson TN	33-1	6	18
Davidson TN	4-3	4	18
Davidson TN	4-3	7	2,225
Davidson TN	5-2	6	4,372
Davidson TN	5-2	7	0
Davidson TN	5-4	6	2,238
Davidson TN	5-4	7	34
Davidson TN	6-3	6	4,253
Davidson TN	6-3	7	0
Davidson TN	8-1	6	3,290
Davidson TN	8-1	7	51
Davidson TN	8-3	6	3,308
Davidson TN	8-3	7	3,279
Jefferson TN	6th Rush Strong School	1	2,155
Jefferson TN	6th Rush Strong School	2	2,621
Maury TN	First Family	5	33
Maury TN	First Family	9	6,176
Maury TN	Highland	5	0
Maury TN	Highland	9	2,749
Maury TN	Pleasant Heights	5	3,534
Maury TN	Pleasant Heights	9	863
Maury TN	Riverside	5	1,965
Maury TN	Riverside	9	1,969
Maury TN	St. Catherine	5	8,301
Maury TN	St. Catherine	9	155
Maury TN	West End	5	811
Maury TN	West End	9	3,168
Montgomery TN	12	5	5,682
Montgomery TN	12	7	4,537
Montgomery TN	13	5	51
Montgomery TN	13	7	8,128
Montgomery TN	16	5	5,072
Montgomery TN	16	7	3,356
Montgomery TN	18	5	1,788

Political Subdivision Splits Between Districts

TN CD 2026

County	Voting District	District	Population
Montgomery TN	18	7	10,255
Montgomery TN	9	5	11,448
Montgomery TN	9	7	1,313
Rhea TN	1-2 Grandview	3	741
Rhea TN	1-2 Grandview	6	181
Rutherford TN	11-1 Smyrna Middle School	4	5,566
Rutherford TN	11-1 Smyrna Middle School	9	2,254
Rutherford TN	19-1 Creekmont General Baptist Church	4	3,868
Rutherford TN	19-1 Creekmont General Baptist Church	9	3,398
Rutherford TN	9-2 Browns Chapel Elementary School	4	6,843
Rutherford TN	9-2 Browns Chapel Elementary School	9	634
Shelby TN	Collierville 5	8	876
Shelby TN	Collierville 5	9	2,450
Shelby TN	Collierville 9	8	3,996
Shelby TN	Collierville 9	9	1,755
Shelby TN	Eads	8	1,091
Shelby TN	Eads	9	1,170
Shelby TN	Forest Hills 1	8	1,547
Shelby TN	Forest Hills 1	9	3,139
Shelby TN	Germantown 06	8	4,357
Shelby TN	Germantown 06	9	0
Shelby TN	Lucy 1	5	982
Shelby TN	Lucy 1	8	1,011
Shelby TN	Memphis 26	5	2,157
Shelby TN	Memphis 26	9	2,034
Shelby TN	Memphis 31-2	5	1,450
Shelby TN	Memphis 31-2	9	1,772
Shelby TN	Memphis 31-4	5	60
Shelby TN	Memphis 31-4	9	3,932
Shelby TN	Memphis 46-2	8	6,265
Shelby TN	Memphis 46-2	9	1,392
Shelby TN	Memphis 53-1	5	0
Shelby TN	Memphis 53-1	8	9,443
Shelby TN	Memphis 58-4	8	5,338
Shelby TN	Memphis 58-4	9	3,916
Shelby TN	Memphis 60-3	5	1,436
Shelby TN	Memphis 60-3	9	1,882
Shelby TN	Memphis 60-9	5	27
Shelby TN	Memphis 60-9	9	4,583
Shelby TN	Memphis 62-0	5	6,868
Shelby TN	Memphis 62-0	8	1,022
Shelby TN	Memphis 81-5	8	5,234

Political Subdivision Splits Between Districts

TN CD 2026

County	Voting District	District	Population
Shelby TN	Memphis 81-5	9	0
Shelby TN	Memphis 81-7	8	8,256
Shelby TN	Memphis 81-7	9	0
Shelby TN	Memphis 87-2	5	395
Shelby TN	Memphis 87-2	8	4,634
Shelby TN	Memphis 90-2	5	5,537
Shelby TN	Memphis 90-2	8	3,904
Shelby TN	Memphis 93-1	8	0
Shelby TN	Memphis 93-1	9	6,999
Shelby TN	Millington 1	5	3,581
Shelby TN	Millington 1	8	3,659
Shelby TN	Morning Sun 02	8	2,937
Shelby TN	Morning Sun 02	9	1,126
Sumner TN	1001 Walton Ferry Elementary	6	920
Sumner TN	1001 Walton Ferry Elementary	7	4,894
Sumner TN	1002 Merrol Hyde Magnet School	6	1,281
Sumner TN	1002 Merrol Hyde Magnet School	7	7,354
Sumner TN	1102 Church of the Nazarene	6	2,095
Sumner TN	1102 Church of the Nazarene	7	3,807
Sumner TN	601 Vol State College	6	4,631
Sumner TN	601 Vol State College	7	3,858
Sumner TN	802 Hawkins Middle School	6	0
Sumner TN	802 Hawkins Middle School	7	5,830
Sumner TN	901 Hendersonville High School	6	0
Sumner TN	901 Hendersonville High School	7	7,319
Sumner TN	902 Indian Lake Elementary	6	0
Sumner TN	902 Indian Lake Elementary	7	6,965
Tipton TN	21 W. Wilkinsville	5	4,871
Tipton TN	21 W. Wilkinsville	8	2,180
Tipton TN	22 Brighton	5	503
Tipton TN	22 Brighton	8	5,946
Williamson TN	3-3 Chapman's Retreat Elementary School	5	5,397
Williamson TN	3-3 Chapman's Retreat Elementary School	9	0

Communities of Interest (Landscape, 11x8.5)

Friday, May 15, 2026

10:12 PM

Census Place	District	Population	%
Atoka Town	5	0	0.0
Atoka Town	8	10,008	100.0
Bean Station City	1	11	0.4
Bean Station City	2	2,956	99.6
Belle Meade City	6	0	0.0
Belle Meade City	7	2,901	100.0
Berry Hill City	6	2,112	100.0
Berry Hill City	7	0	0.0
Brentwood City	5	699	1.5
Brentwood City	9	44,674	98.5
Brighton Town	5	0	0.0
Brighton Town	8	2,888	100.0
Clarksville City	5	50,520	30.3
Clarksville City	7	116,202	69.7
Collierville Town	8	25,182	49.1
Collierville Town	9	26,142	50.9
Columbia City	5	20,107	48.2
Columbia City	9	21,583	51.8
Eagleville City	4	813	100.0
Eagleville City	9	0	0.0
Enville Town	8	181	96.3

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

Census Place	District	Population	%
Enville Town	9	7	3.7
Franklin City	5	61,113	73.2
Franklin City	9	22,341	26.8
Gallatin City	6	2,893	6.5
Gallatin City	7	41,538	93.5
Germantown City	8	41,254	99.8
Germantown City	9	79	0.2
Goodlettsville City	6	5,062	28.5
Goodlettsville City	7	12,727	71.5
Harriman City	3	5,892	100.0
Harriman City	6	0	0.0
Hendersonville City	6	6,615	10.7
Hendersonville City	7	55,138	89.3
Kenton Town	5	506	42.0
Kenton Town	8	699	58.0
La Follette City	2	3,742	50.4
La Follette City	6	3,688	49.6
La Vergne City	4	32,274	83.4
La Vergne City	9	6,445	16.7
McKenzie City	5	267	4.8
McKenzie City	8	5,262	95.2
Memphis City	5	212,105	33.5
Memphis City	8	222,303	35.1
Memphis City	9	198,696	31.4
Milledgeville Town	8	73	26.9

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

Census Place	District	Population	%
Milledgeville Town	9	198	73.1
Millington City	5	32	0.3
Millington City	8	10,550	99.7
Nashville-Davidson metropolitan governme	4	230,071	33.4
Nashville-Davidson metropolitan governme	6	264,220	38.3
Nashville-Davidson metropolitan governme	7	195,156	28.3
Oakland Town	8	319	3.6
Oakland Town	9	8,617	96.4
Oliver Springs Town	3	3,268	99.1
Oliver Springs Town	6	29	0.9
Rarity Bay CDP	2	393	44.4
Rarity Bay CDP	3	492	55.6
Rocky Top City	3	1,578	96.9
Rocky Top City	6	50	3.1
Seymour CDP	1	11,928	81.1
Seymour CDP	2	2,777	18.9
Silerton Town	8	4	4.1
Silerton Town	9	93	95.9
Smyrna Town	4	26,424	49.8
Smyrna Town	9	26,646	50.2
Spring Hill City	5	49,981	100.0
Spring Hill City	9	24	0.1
Strawberry Plains CDP	1	81	3.4

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

Census Place	District	Population	%
Strawberry Plains CDP	2	2,324	96.6
Thompson's Station Town	5	7,147	95.5
Thompson's Station Town	9	338	4.5
Vonore Town	2	0	0.0
Vonore Town	3	1,574	100.0

Census Place	-- Listed by District	
	Population	%
Bean Station City (part)	11	0.4
Seymour CDP (part)	11,928	81.1
Strawberry Plains CDP (part)	81	3.4
District 1 Totals	375,106	
La Follette City (part)	3,742	50.4
Rarity Bay CDP (part)	393	44.4
Seymour CDP (part)	2,777	18.9
Strawberry Plains CDP (part)	2,324	96.6
Vonore Town (part)	0	0.0
District 2 Totals	361,932	
Oliver Springs Town (part)	3,268	99.1
Rarity Bay CDP (part)	492	55.6
Rocky Top City (part)	1,578	96.9
District 3 Totals	471,467	
La Vergne City (part)	32,274	83.4
Nashville-Davidson metropolitan governme (part)	230,071	33.4
Smyrna Town (part)	26,424	49.8
District 4 Totals	552,712	

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

	Population	%
Atoka Town (part)	0	0.0
Brentwood City (part)	699	1.5
Brighton Town (part)	0	0.0
Clarksville City (part)	50,520	30.3
Columbia City (part)	20,107	48.2
Franklin City (part)	61,113	73.2
Kenton Town (part)	506	42.0
McKenzie City (part)	267	4.8
Memphis City (part)	212,105	33.5
Millington City (part)	32	0.3
Thompson's Station Town (part)	7,147	95.5
District 5 Totals	537,707	
Belle Meade City (part)	0	0.0
Gallatin City (part)	2,893	6.5
Goodlettsville City (part)	5,062	28.5
Harriman City (part)	0	0.0
Hendersonville City (part)	6,615	10.7
La Follette City (part)	3,688	49.6
Nashville-Davidson metropolitan governme (part)	264,220	38.3
Oliver Springs Town (part)	29	0.9
Rocky Top City (part)	50	3.1
District 6 Totals	492,162	

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

	Population	%
Berry Hill City (part)	0	0.0
Clarksville City (part)	116,202	69.7
Gallatin City (part)	41,538	93.5
Goodlettsville City (part)	12,727	71.5
Hendersonville City (part)	55,138	89.3
Nashville-Davidson metropolitan governme (part)	195,156	28.3
District 7 Totals	568,609	
Collierville Town (part)	25,182	49.1
Enville Town (part)	181	96.3
Kenton Town (part)	699	58.0
McKenzie City (part)	5,262	95.2
Memphis City (part)	222,303	35.1
Milledgeville Town (part)	73	26.9
Oakland Town (part)	319	3.6
Silerton Town (part)	4	4.1
District 8 Totals	568,948	

Communities of Interest (Landscape, 11x8.5)

TN CD 2026

	Population	%
Brentwood City (part)	44,674	98.5
Collierville Town (part)	26,142	50.9
Columbia City (part)	21,583	51.8
Eagleville City (part)	0	0.0
Enville Town (part)	7	3.7
Franklin City (part)	22,341	26.8
Germantown City (part)	79	0.2
La Vergne City (part)	6,445	16.7
Memphis City (part)	198,696	31.4
Milledgeville Town (part)	198	73.1
Oakland Town (part)	8,617	96.4
Silerton Town (part)	93	95.9
Smyrna Town (part)	26,646	50.2
Spring Hill City (part)	24	0.1
Thompson's Station Town (part)	338	4.5
District 9 Totals	499,329	

Summary Statistics

Number of Census Place not split	464
Number of Census Place split	38
Number of Census Place split in 2	36
Number of Census Place split in 3	2
Total number of splits	78

County by District and by County

Monday, May 18, 2026

1:02 PM

	Population	% of District
District 1		
Carter	56,356	100.00%
Cocke	35,999	100.00%
Greene	70,152	100.00%
Hamblen	64,499	100.00%
Hancock	6,662	100.00%
Hawkins	56,721	100.00%
Jefferson	52,062	95.21%
Johnson	17,948	100.00%
Sevier	98,380	100.00%
Sullivan	158,163	100.00%
Unicoi	17,928	100.00%
Washington	133,001	100.00%
Total District 1	767,871	
District 2		
Blount	135,280	100.00%
Campbell	20,741	52.81%
Claiborne	32,043	100.00%
Grainger	23,527	100.00%
Jefferson	2,621	4.79%
Knox	478,971	100.00%
Loudon	54,886	100.00%
Union	19,802	100.00%
Total District 2	767,871	
District 3		
Anderson	77,123	100.00%
Bradley	108,620	100.00%
Hamilton	366,207	100.00%
McMinn	53,276	100.00%
Meigs	12,758	100.00%
Monroe	46,250	100.00%
Polk	17,544	100.00%
Rhea	32,689	99.45%
Roane	53,404	100.00%
Total District 3	767,871	
District 4		
Bledsoe	14,913	100.00%
Cannon	14,506	100.00%
Coffee	57,889	100.00%

	Population	% of District
Davidson	230,071	32.14%
Franklin	42,774	100.00%
Grundy	13,529	100.00%
Marion	28,837	100.00%
Rutherford	302,405	88.56%
Sequatchie	15,826	100.00%
Van Buren	6,168	100.00%
Warren	40,953	100.00%
Total District 4	767,871	
District 5		
Benton	15,864	100.00%
Dyer	36,801	100.00%
Henry	32,199	100.00%
Hickman	24,925	100.00%
Houston	8,283	100.00%
Humphreys	18,990	100.00%
Lake	7,005	100.00%
Lauderdale	25,143	100.00%
Lewis	12,582	100.00%
Maury	68,162	67.50%
Montgomery	54,309	24.68%
Obion	30,787	100.00%
Shelby	221,035	23.77%
Stewart	13,657	100.00%
Tipton	24,618	40.38%
Weakley	32,902	100.00%
Williamson	140,609	56.76%
Total District 5	767,871	
District 6		
Campbell	18,531	47.19%
Clay	7,581	100.00%
Cumberland	61,145	100.00%
Davidson	269,299	37.62%
DeKalb	20,080	100.00%
Fentress	18,489	100.00%
Jackson	11,617	100.00%
Morgan	21,035	100.00%
Overton	22,511	100.00%
Pickett	5,001	100.00%
Putnam	79,854	100.00%
Rhea	181	0.55%
Scott	21,850	100.00%
Smith	19,904	100.00%
Sumner	15,705	8.00%

	Population	% of District
White	27,351	100.00%
Wilson	147,737	100.00%
Total District 6	767,871	
District 7		
Cheatham	41,072	100.00%
Davidson	216,514	30.24%
Dickson	54,315	100.00%
Macon	25,216	100.00%
Montgomery	165,760	75.32%
Robertson	72,803	100.00%
Sumner	180,576	92.00%
Trousdale	11,615	100.00%
Total District 7	767,871	
District 8		
Carroll	28,440	100.00%
Chester	17,341	100.00%
Crockett	13,911	100.00%
Decatur	11,435	100.00%
Fayette	16,936	40.33%
Gibson	50,429	100.00%
Haywood	17,864	100.00%
Henderson	27,842	100.00%
Madison	98,823	100.00%
Perry	8,366	100.00%
Shelby	440,132	47.34%
Tipton	36,352	59.62%
Total District 8	767,871	
District 9		
Bedford	50,237	100.00%
Fayette	25,054	59.67%
Giles	30,346	100.00%
Hardeman	25,462	100.00%
Hardin	26,831	100.00%
Lawrence	44,159	100.00%
Lincoln	35,319	100.00%
Marshall	34,318	100.00%
Maury	32,812	32.50%
McNairy	25,866	100.00%
Moore	6,461	100.00%
Rutherford	39,081	11.44%
Shelby	268,577	28.89%
Wayne	16,232	100.00%
Williamson	107,117	43.24%

	Population	% of District
Total District 9	767,872	

Appendix D

Core Constituencies Reports

- Core Constituency Report State 2022 to 2026
- Core Constituency Report Shelby County 2022 to 2026

User: Tony Fairfax

Plan Name: TN CD 2026 Shelby

Plan Type: TN Cong 2026

Core Constituencies

Saturday, May 16, 2026

11:12 AM

From Plan: **TN CD 2022 Shelby**

Plan: TN CD 2026 Shelby, District 5 --

221,035 Total Population

	Population	AP_Black	NH_White	[18+_Pop]	[18+_AP_Black]	[NH18+_White]
Dist. 9	221,035 (100.00%)	161,617 (100.00%)	42,135 (100.00%)	170,023 (100.00%)	119,682 (100.00%)	37,725 (100.00%)
Total and % Population		161,617 (73.12%)	42,135 (19.06%)	170,023 (76.92%)	119,682 (54.15%)	37,725 (17.07%)

Plan: TN CD 2026 Shelby, District 8 --

440,132 Total Population

	Population	AP_Black	NH_White	[18+_Pop]	[18+_AP_Black]	[NH18+_White]
Dist. 8	167,087 (37.96%)	15,875 (11.88%)	129,943 (54.88%)	126,550 (37.66%)	11,493 (11.80%)	100,644 (52.57%)
Dist. 9	273,045 (62.04%)	117,744 (88.12%)	106,824 (45.12%)	209,464 (62.34%)	85,878 (88.20%)	90,810 (47.43%)
Total and % Population		133,619 (30.36%)	236,767 (53.79%)	336,014 (76.34%)	97,371 (22.12%)	191,454 (43.50%)

Plan: TN CD 2026 Shelby, District 9 --

268,577 Total Population

	Population	AP_Black	NH_White	[18+_Pop]	[18+_AP_Black]	[NH18+_White]
Dist. 8	25,380 (9.45%)	4,319 (2.19%)	15,857 (41.91%)	19,301 (9.65%)	3,248 (2.23%)	12,557 (39.09%)
Dist. 9	243,197 (90.55%)	193,202 (97.81%)	21,981 (58.09%)	180,725 (90.35%)	142,501 (97.77%)	19,564 (60.91%)
Total and % Population		197,521 (73.54%)	37,838 (14.09%)	200,026 (74.48%)	145,749 (54.27%)	32,121 (11.96%)

User: Tony Fairfax

Plan Name: TN CD 2026

Plan Type: TN Cong 2026

Core Constituencies

Wednesday, June 3, 2026

7:35 PM

From Plan: TN CD 2022

Plan: TN CD 2026, District 1 --

767,871 Total Population

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 1	767,871 (100.00%)	24,950 (100.00%)	674,765 (100.00%)	616,550 (100.00%)	16,903 (100.00%)	552,337 (100.00%)
Total and % Population		24,950 (3.25%)	674,765 (87.87%)	616,550 (80.29%)	16,903 (2.20%)	552,337 (71.93%)

Plan: TN CD 2026, District 2 --

767,871 Total Population

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 2	767,726 (99.98%)	55,733 (99.99%)	630,481 (99.98%)	609,400 (99.98%)	38,403 (99.99%)	513,710 (99.98%)
Dist. 3	145 (0.02%)	3 (0.01%)	128 (0.02%)	112 (0.02%)	3 (0.01%)	100 (0.02%)
Total and % Population		55,736 (7.26%)	630,609 (82.12%)	609,512 (79.38%)	38,406 (5.00%)	513,810 (66.91%)

Plan: TN CD 2026, District 3 --

767,871 Total Population

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 3	722,424 (94.08%)	86,846 (98.66%)	555,398 (93.24%)	570,903 (94.13%)	62,555 (98.78%)	452,544 (93.39%)
Dist. 4	45,447 (5.92%)	1,176 (1.34%)	40,297 (6.76%)	35,579 (5.87%)	772 (1.22%)	32,044 (6.61%)
Total and % Population		88,022 (11.46%)	595,695 (77.58%)	606,482 (78.98%)	63,327 (8.25%)	484,588 (63.11%)

Plan: TN CD 2026, District 4 --

767,871 Total Population

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 4	516,641 (67.28%)	63,955 (49.99%)	380,006 (77.13%)	395,702 (67.47%)	44,253 (48.39%)	301,761 (76.39%)
Dist. 5	194,509 (25.33%)	55,276 (43.21%)	77,408 (15.71%)	146,065 (24.90%)	40,587 (44.38%)	63,937 (16.19%)
Dist. 6	56,721 (7.39%)	8,702 (6.80%)	35,274 (7.16%)	44,751 (7.63%)	6,613 (7.23%)	29,304 (7.42%)
Dist. 7	0 (0.00%)	0 (0.00%)	(0.00%)	(0.00%)	(0.00%)	(0.00%)
Total and % Population		127,933 (16.66%)	492,688 (64.16%)	586,518 (76.38%)	91,453 (11.91%)	395,002 (51.44%)

From Plan: **TN CD 2022****Plan: TN CD 2026, District 5 --****767,871 Total Population**

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 5	134,860 (17.56%)	9,992 (4.44%)	110,596 (23.51%)	99,147 (16.90%)	6,803 (4.16%)	83,219 (22.30%)
Dist. 7	217,129 (28.28%)	24,358 (10.83%)	164,663 (35.01%)	164,814 (28.09%)	16,392 (10.02%)	129,272 (34.63%)
Dist. 8	170,229 (22.17%)	26,607 (11.83%)	132,618 (28.19%)	133,913 (22.83%)	18,986 (11.61%)	107,293 (28.75%)
Dist. 9	245,653 (31.99%)	163,898 (72.89%)	62,501 (13.29%)	188,778 (32.18%)	121,336 (74.20%)	53,471 (14.33%)
Total and % Population		224,855 (29.28%)	470,378 (61.26%)	586,652 (76.40%)	163,517 (21.29%)	373,255 (48.61%)

Plan: TN CD 2026, District 6 --**767,871 Total Population**

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 2	145 (0.02%)	1 (0.00%)	129 (0.02%)	103 (0.02%)	1 (0.00%)	96 (0.02%)
Dist. 3	45,302 (5.90%)	1,245 (1.39%)	41,940 (7.11%)	35,998 (5.86%)	1,114 (1.71%)	33,310 (6.86%)
Dist. 4	181 (0.02%)	5 (0.01%)	167 (0.03%)	156 (0.03%)	4 (0.01%)	144 (0.03%)
Dist. 5	149,438 (19.46%)	17,181 (19.20%)	112,662 (19.09%)	115,549 (18.80%)	11,846 (18.16%)	90,365 (18.60%)
Dist. 6	473,110 (61.61%)	44,749 (50.00%)	377,644 (63.98%)	376,207 (61.22%)	31,791 (48.74%)	308,610 (63.53%)
Dist. 7	99,695 (12.98%)	26,317 (29.41%)	57,711 (9.78%)	86,484 (14.07%)	20,464 (31.38%)	53,215 (10.96%)
Total and % Population		89,498 (11.66%)	590,253 (76.87%)	614,497 (80.03%)	65,220 (8.49%)	485,740 (63.26%)

Plan: TN CD 2026, District 7 --**767,871 Total Population**

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 5	114,817 (14.95%)	7,172 (6.00%)	94,528 (16.99%)	93,798 (15.80%)	5,484 (6.43%)	78,517 (17.65%)
Dist. 6	238,040 (31.00%)	26,302 (22.01%)	183,730 (33.02%)	182,465 (30.73%)	18,289 (21.44%)	145,266 (32.66%)
Dist. 7	415,014 (54.05%)	86,035 (71.99%)	278,158 (49.99%)	317,469 (53.47%)	61,547 (72.14%)	220,989 (49.69%)
Total and % Population		119,509 (15.56%)	556,416 (72.46%)	593,732 (77.32%)	85,320 (11.11%)	444,772 (57.92%)

Plan: TN CD 2026, District 8 --**767,871 Total Population**

	Population	AP_Bl	NH_Wh	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wh]
Dist. 7	19,801 (2.58%)	620 (0.29%)	18,162 (3.94%)	15,692 (2.66%)	444 (0.28%)	14,527 (3.92%)
Dist. 8	469,049 (61.08%)	93,407 (43.46%)	333,258 (72.32%)	360,701 (61.12%)	68,370 (43.61%)	263,483 (71.06%)
Dist. 9	279,021 (36.34%)	120,921 (56.26%)	109,373 (23.74%)	213,730 (36.22%)	87,975 (56.11%)	92,785 (25.02%)

From Plan: **TN CD 2022****Plan: TN CD 2026, District 8 --****767,871 Total Population**

	Population	AP_Bl	NH_Wht	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wht]
Total and % Population	214,948 (27.99%)	460,793 (60.01%)	590,123 (76.85%)	156,789 (20.42%)	370,795 (48.29%)	

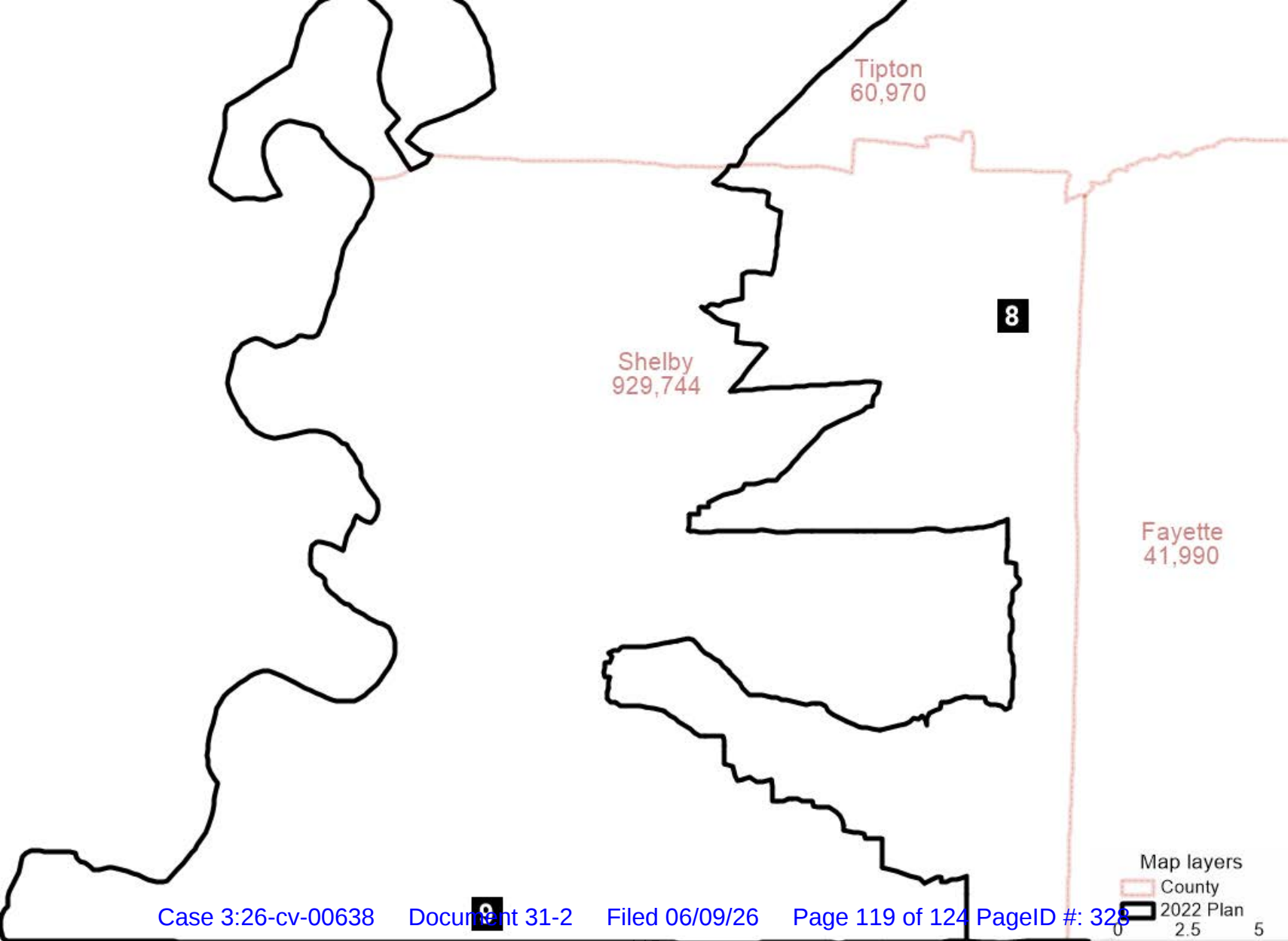
Plan: TN CD 2026, District 9 --**767,872 Total Population**

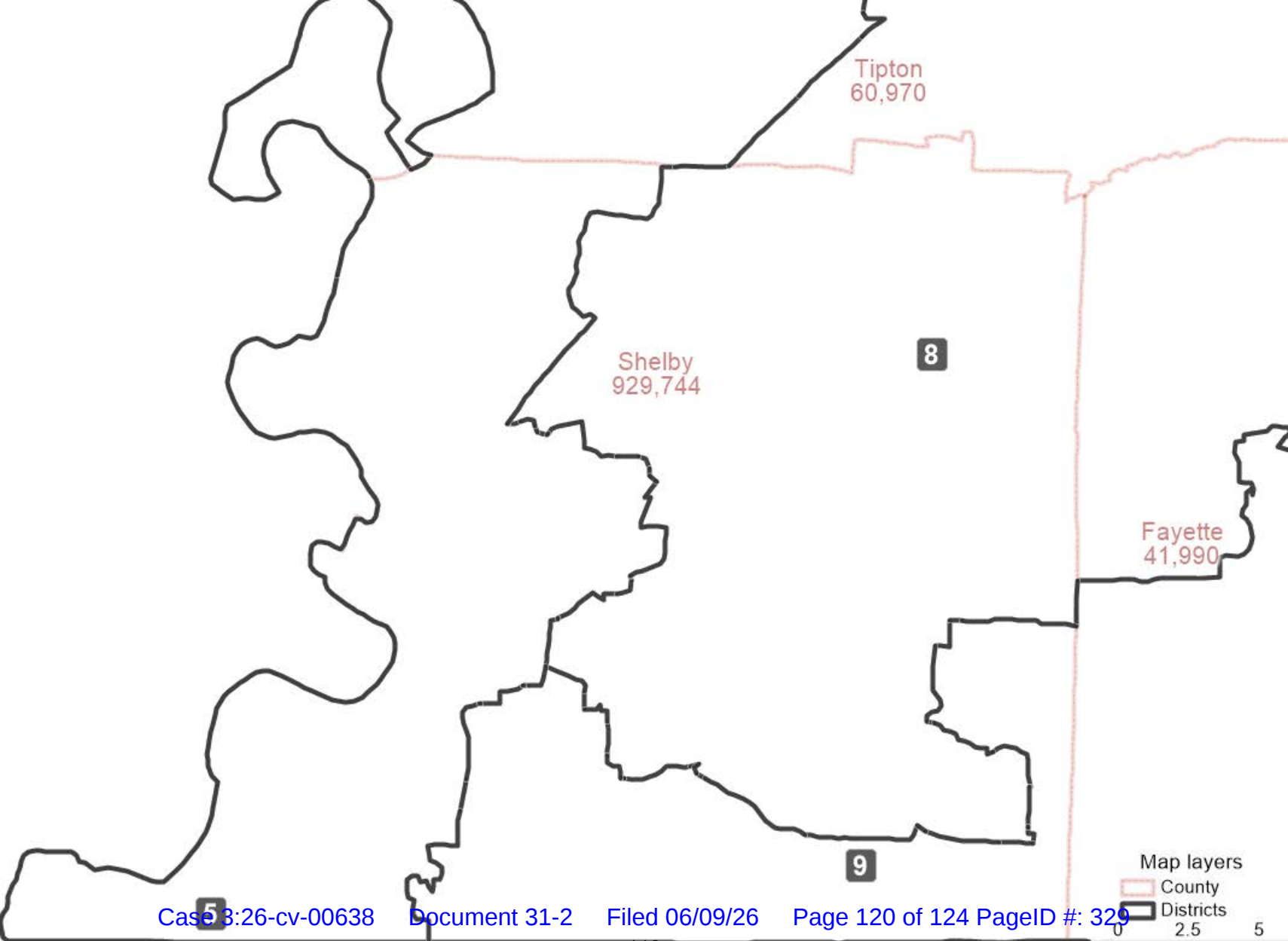
	Population	AP_Bl	NH_Wht	[18+_Pop]	[18+_AP_Bl]	[NH18+_Wht]
Dist. 4	205,603 (26.78%)	19,168 (7.65%)	162,027 (37.80%)	156,008 (26.88%)	12,878 (7.01%)	127,135 (37.61%)
Dist. 5	174,247 (22.69%)	13,287 (5.30%)	136,030 (31.73%)	127,946 (22.04%)	9,103 (4.95%)	102,843 (30.43%)
Dist. 7	16,232 (2.11%)	972 (0.39%)	14,503 (3.38%)	13,337 (2.30%)	877 (0.48%)	11,885 (3.52%)
Dist. 8	128,593 (16.75%)	24,034 (9.59%)	94,108 (21.95%)	102,391 (17.64%)	18,443 (10.03%)	76,570 (22.65%)
Dist. 9	243,197 (31.67%)	193,202 (77.08%)	21,981 (5.13%)	180,725 (31.14%)	142,501 (77.53%)	19,564 (5.79%)
Total and % Population	250,663 (32.64%)	428,649 (55.82%)	580,407 (75.59%)	183,802 (23.94%)	337,997 (44.02%)	

Appendix E

Additional Maps

Figures 3 – 4 & Figures 6 - 9





Tipton
60,970

Shelby
929,744

Fayette
41,990

8

9

5

Case 3:26-cv-00638

Document 31-2

Filed 06/09/26

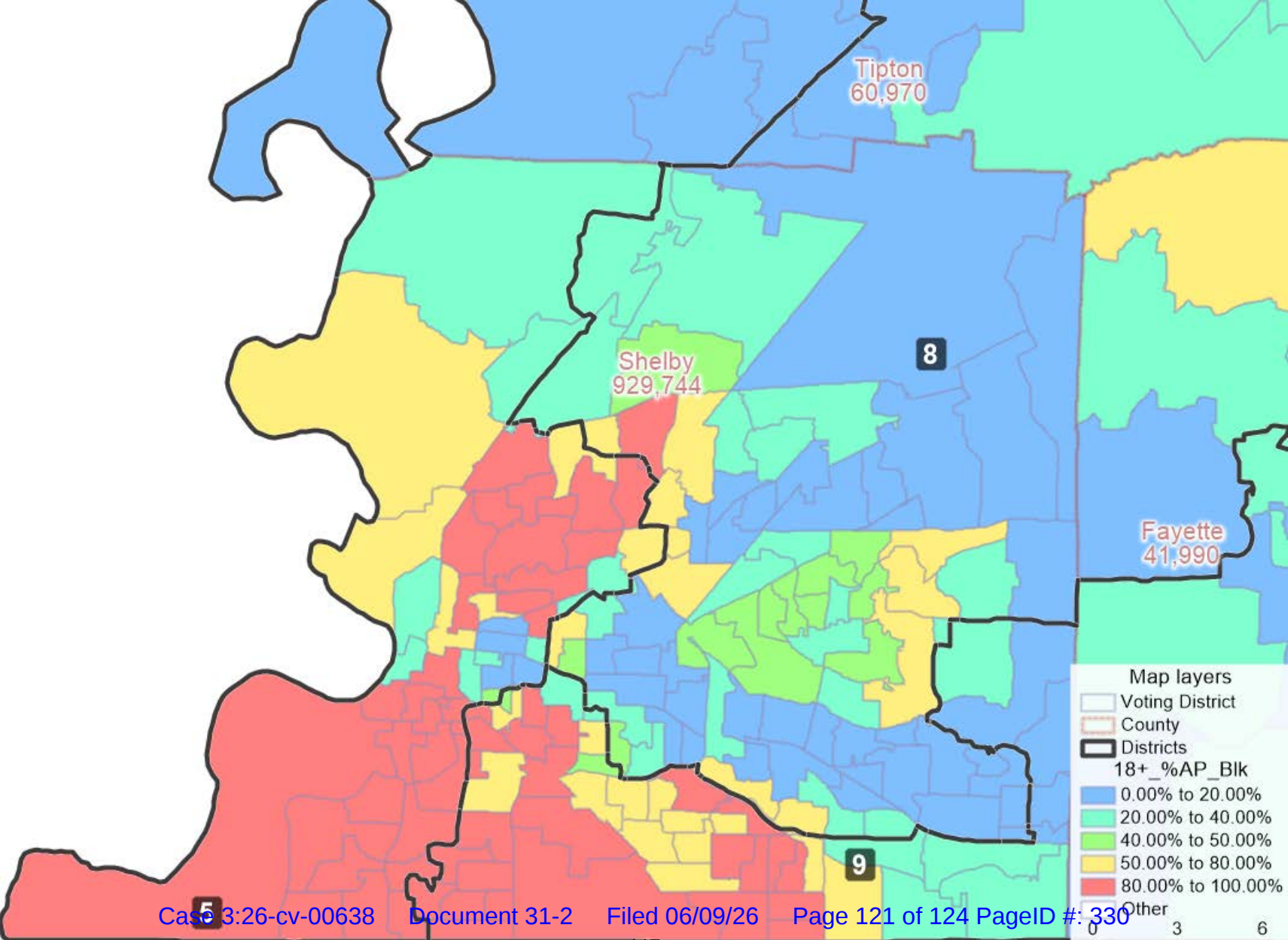
Page 120 of 124 PageID #: 329

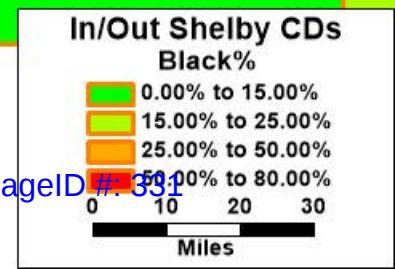
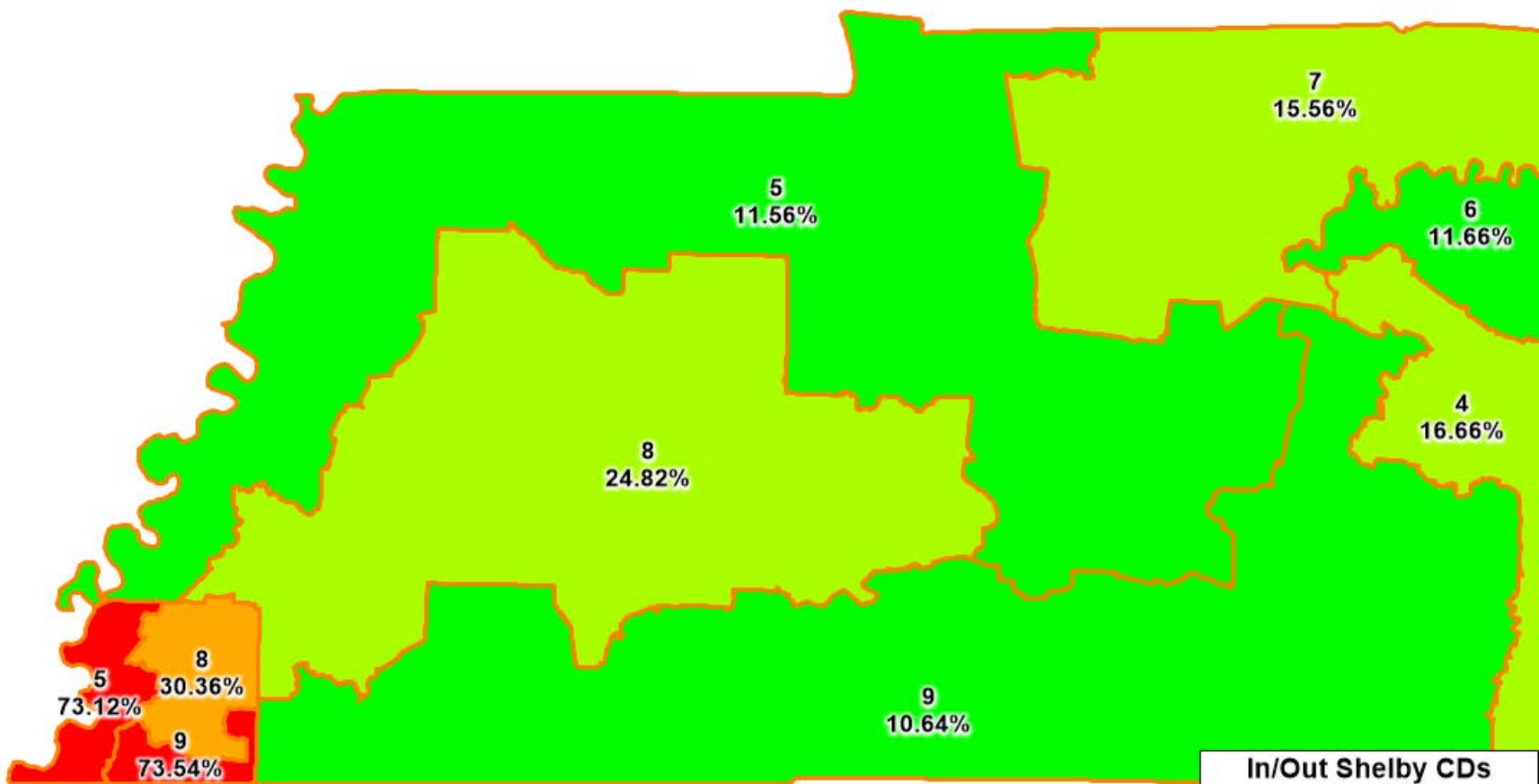
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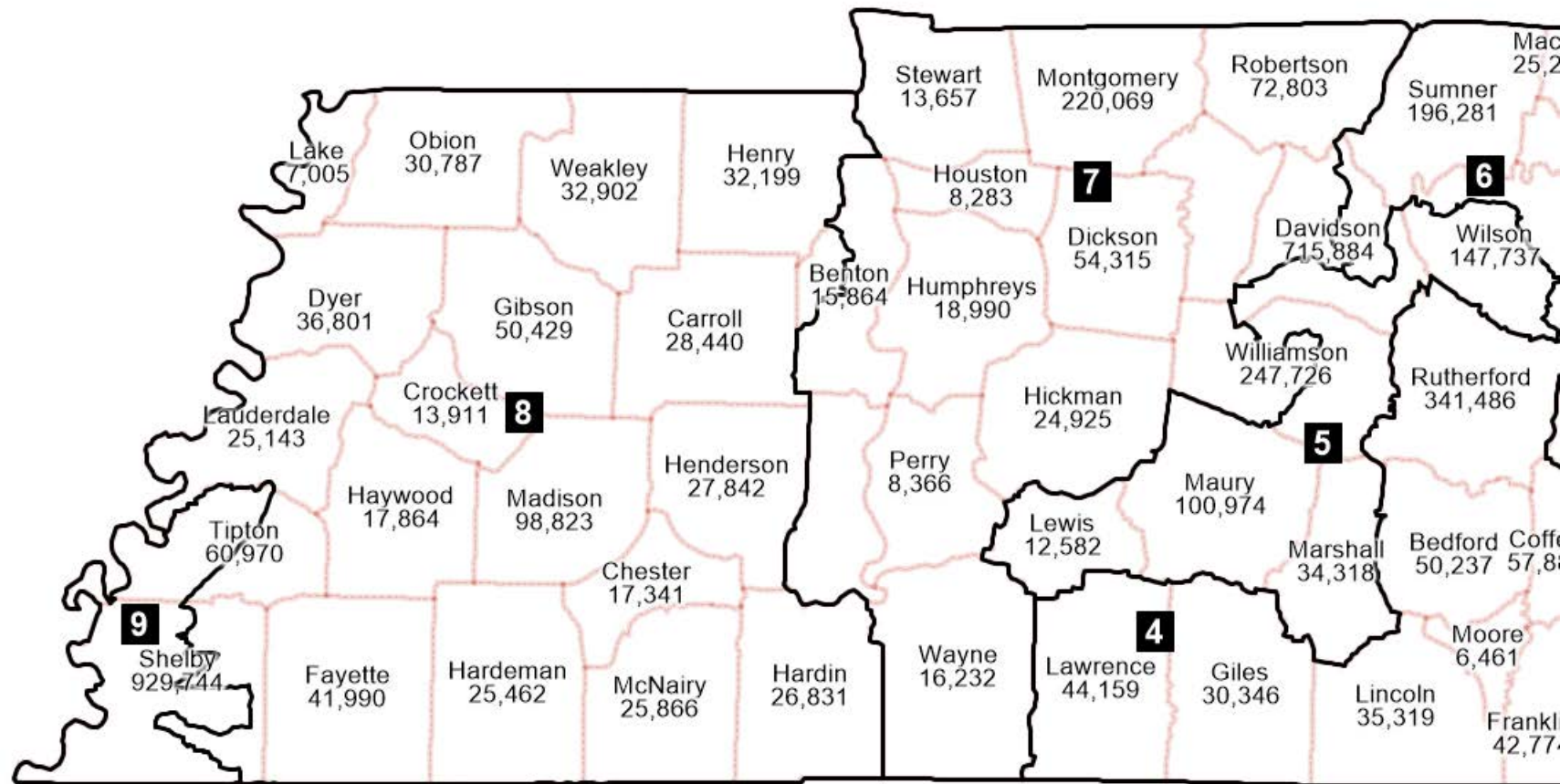
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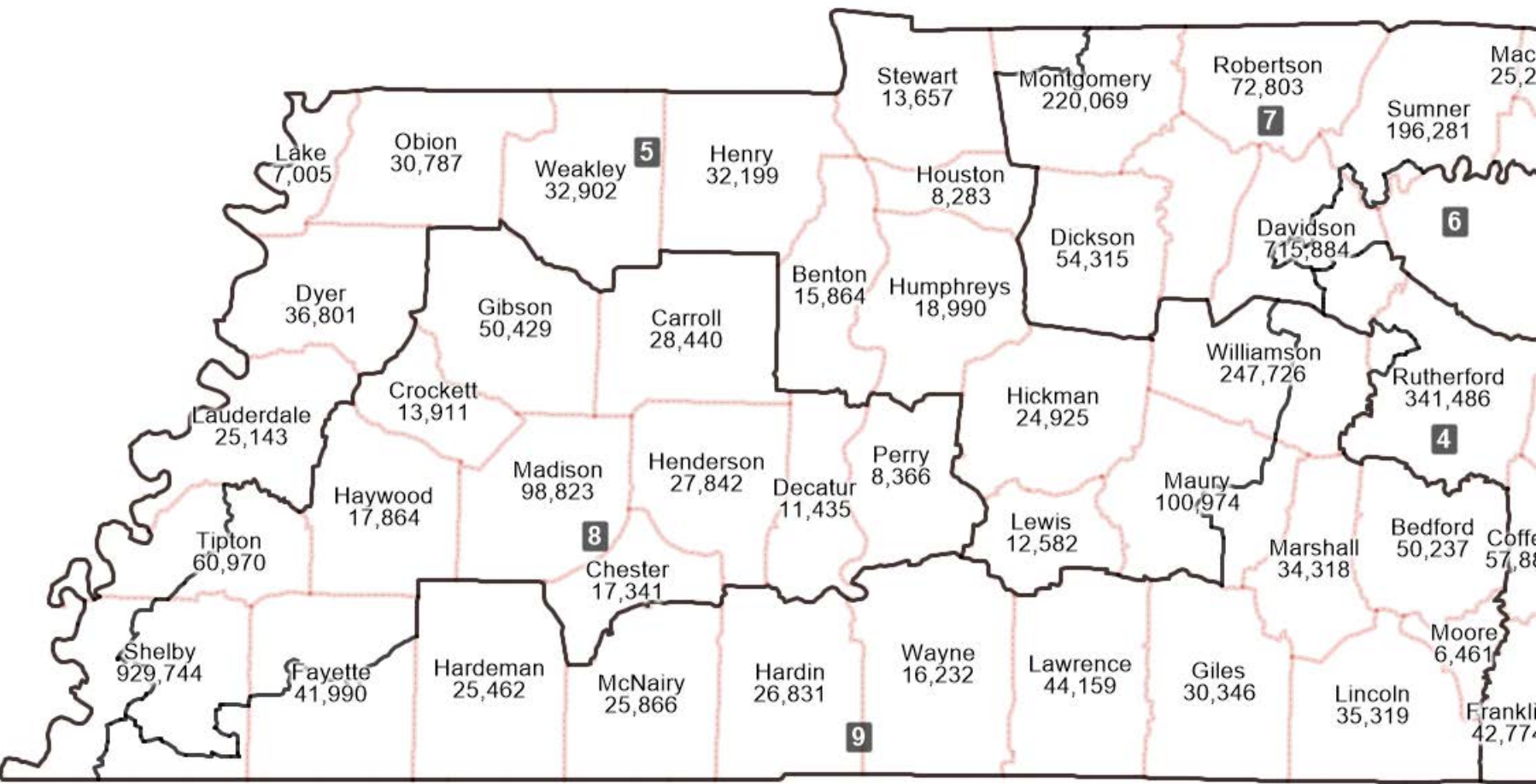


EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE OF THE
NAACP et al.,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee et al.,

Defendants.

Case No. 3:26-cv-638

DECLARATION OF DR. BAODONG LIU

I. Introduction

I have been retained as an expert by counsel for the Plaintiffs in the above-captioned litigation. I have prepared this report pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) regarding Tennessee's new congressional redistricting plan (the 2026 Plan).

I am being compensated at \$300 per hour for my work on this case. My compensation is not contingent on or affected by the substance of my opinions or the outcome of this litigation. I reserve the right to amend, modify, or supplement my analysis and opinions if any new facts or information become known to me.

Qualifications

I am a Presidential Societal Impact Scholar, a tenured full professor of political science and the Director of Graduate Studies in the Department of Political Science at the University of Utah. I have done extensive research regarding the relationship between election systems and the ability of minority voters to participate equally in the political process and to elect representatives of their choice.

My research has won the Byran Jackson Award for the best study/dissertation about racial voting from the Urban Politics Section of the American Political Science Association, and the Ted Robinson Award from the Southwest Political Science Association. The results of my research have been published in Social

Science Quarterly, American Politics Research, Sociological Methods and Research, PS: Political Science and Politics, Urban Affairs Review, Political Behavior, Journal of Urban Affairs, Southeastern Political Review, and American Review of Politics, among other journals. I am also an author, co-author, or editor of nine scholarly books including Political Volatility in the United States: How Racial and Religious Groups Win and Lose; Solving the Mystery of the Model Minority; The Election of Barack Obama: How He Won, and Race Rules: Electoral Politics in New Orleans, 1965-2006. I have also served as a member of the Board of Directors/Advisors on many national and international organizations such as the National Association for Ethnic Studies, Urban Affairs Review, Journal of Behavioral and Social Sciences, and International Encyclopedia of Political Science (CQ Press).

As an expert on voting rights, I have published peer-reviewed journal articles and books on the techniques used by academic professionals and supported by courts concerning voting rights cases and the electoral history in the South. I have served as an expert witness in approximately 15 voting rights cases in states such as Alabama, Arkansas, New York, Louisiana, Utah, South Carolina, and Tennessee.

Furthermore, I have provided my expertise to Native American Rights Fund, Navajo Nation, the U.S. Department of Justice, and the Lawyers' Committee for Civil Rights Under Law and others on methodological issues concerning quantitative analysis of racially polarized voting.

My applied research and grants have included analyses of ranked choice voting, economic development, racial voting patterns, public school science education, school districts' economic impact on local economy, and various citizen surveys. My grants have come from New America, the National Science Foundation, American Political Science Association, the National Humanities Center, Wisconsin Security Research Consortium, Fond du Lac School District, Johnson Controls, Inc., City of Waupaca (WI), the League of Women Voters, American Democracy Project, and Wisconsin Public Service. I also served as the editor of Urban News for the American Political Science Association's Urban Politics Section, and I was elected as a co-chair of the Asian Pacific American Caucus of the American Political Science Association.

Attached as Appendix I is a curriculum vitae setting forth my professional background, which includes a list of all publications I have authored or co-authored.

Attached as Appendix II is a list of all cases in which I have testified as an expert by deposition and/or at trial, and additional cases in which I submitted an expert report only.

Assignment

I have been asked to express opinions on whether racially polarized voting (RPV) exists in Tennessee, and whether or not the new 2026 Congressional Redistricting Plan allows Black voters to participate fully in Congressional elections and elect candidates of their choice.

II. Racially Polarized Voting

2.1 Methodology

Racial polarization voting (RPV) is estimated using ecological inference (EI), applied separately to two statewide elections featuring Black Democratic candidates: the 2020 U.S. Senate race (Marquita Bradshaw, the first Black woman nominated for U.S. Senate by a major party in Tennessee) and the 2024 presidential race (Kamala Harris). The detailed results are reported at the congressional district level as estimated proportions of Black and white VAP supporting the Democratic candidate, with 95% confidence intervals in parentheses (the EI operations were conducted through the RxC EI R package called eiPack).

2.2 The 2020 U.S. Senate Election: Marquita Bradshaw v. Bill Hagerty

As shown in Table 1, Black voters supported Bradshaw at rates between 75% and 97%, while white voters supported her at rates between 14% and 28%—a gap of 54 to 83 percentage points. Bradshaw was defeated in all nine new congressional districts. The three districts with the largest Black concentrations under the new plan—CD 5 (27.9%), CD 8 (26.6%), and CD 9 (31.7%)—show the most extreme racial polarization: Black support of 92–97% against white support of only 14–20%.

Table 1. District-level RPV estimates, 2020 U.S. Senate (Marquita Bradshaw v. Bill Hagerty).

CD	AP Black VAP %	Black Support for Bradshaw	White Support for Bradshaw	Bradshaw % of Vote	Bradshaw Defeated?
CD 1	2.7%	75.1% (67–85)	16.2% (15–17)	20.6%	Yes
CD 2	6.3%	90.8% (83–95)	27.1% (25–30)	32.6%	Yes
CD 3	10.4%	90.9% (88–94)	23.4% (22–25)	33.0%	Yes
CD 4	15.6%	88.6% (81–93)	25.8% (23–29)	39.0%	Yes
CD 5	27.9%	95.1% (93–97)	20.4% (18–24)	41.5%	Yes
CD 6	10.6%	90.2% (86–93)	27.3% (25–30)	36.8%	Yes
CD 7	14.4%	82.3% (75–90)	28.2% (25–32)	38.2%	Yes
CD 8	26.6%	92.0% (88–95)	16.0% (13–21)	37.7%	Yes
CD 9	31.7%	96.9% (96–98)	13.5% (11–17)	42.4%	Yes

Confidence intervals (95%) in parentheses.

2.3 The 2024 Presidential Election: Kamala Harris v. Donald Trump

The 2024 presidential election replicates the pattern with independent data. Black voters supported Harris at rates of 67%–93% across all districts where estimates are reliable; white voters opposed her at rates of 70%–83%. Harris was defeated in all nine congressional districts. CD 9—which has the highest Black concentration (31.7%) under the new plan—shows Harris receiving 39.9% of the total vote, the highest among all nine districts, yet still falling well short of a majority. The new map fragments Black voting strength so thoroughly that no district comes close to the threshold at which cohesive Black voting could overcome racially polarized white opposition.

Table 2. District-level RPV estimates, 2024 Presidential election (Kamala Harris v. Donald Trump).

CD	AP Black VAP %	Black Support for Harris	White Support for Harris	Harris % of Vote	Harris Defeated?
CD 1	2.7%	68.2% (47–84)	17.0% (17–18)	20.4%	Yes
CD 2	6.3%	72.8% (63–81)	27.5% (26–29)	31.7%	Yes
CD 3	10.4%	82.7% (74–87)	23.1% (20–26)	36.4%	Yes
CD 4	15.6%	67.2% (61–76)	29.0% (26–30)	36.9%	Yes
CD 5	27.9%	93.0% (91–94)	19.4% (18–21)	38.8%	Yes
CD 6	10.6%	77.5% (69–86)	26.2% (24–28)	35.3%	Yes
CD 7	14.4%	71.0% (59–80)	30.5% (29–33)	39.1%	Yes
CD 8	26.6%	80.7% (72–85)	24.2% (22–30)	39.1%	Yes
CD 9	31.7%	92.6% (90–95)	15.8% (14–19)	39.9%	Yes

Confidence intervals (95%) in parentheses. CD1 Black support estimate is uncertain due to extremely small Black population causing wide confidence intervals.

2.4 The Structural Electoral Impossibility

The evidence from two independent elections points to the same conclusion. The Black-preferred candidate was defeated in all nine new congressional districts in both the 2020 Senate and 2024 presidential elections. Across eight districts with reliable RVP estimates, Black voters vote cohesively (67%–97% support) while white voters vote in opposition (14%–31% support)—a pattern that satisfies every standard definition of severe racial polarization. Under the 2026 map, with no district exceeding 31.7% AP Black VAP, there is no district in which Black voters constitute a sufficiently large share of the electorate to overcome this bloc opposition and elect a candidate of their choice. The maximum Black VAP under the new plan (31.7% in CD 9) falls nearly 28 percentage points below the 59.6% Black majority that existed under the previous CD 9, precisely the district that historically provided Black Tennesseans their only realistic path to representation.

III. Conclusion

In both the 2020 U.S. Senate election and the 2024 presidential election, the Black-preferred candidate was defeated in all nine of Tennessee's new congressional districts based on the configuration of the 2026 plan. Across the nine districts with reliable ecological inference estimates, Black voters supported the Democratic candidate at rates between 68% and 97%, while white voters opposed at rates between 70% and 87%. The racial polarization gap—exceeding 40 percentage points in every district—means that Black voters cannot overcome non-Black bloc opposition in any district drawn under the 2026 plan. No district under the 2026 map provides Black voters a realistic opportunity to elect a candidate of their choice. This structural foreclosure is not incidental: it is the direct and inevitable consequence of cracking Black population concentrations across district lines so that no district reaches the threshold at which cohesive Black voting can overcome racially polarized white bloc opposition.

IV. Appendix

Appendix 1 is my curriculum vita.

Appendix 2 is the list of voting-rights cases for which I served as an expert witness.

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



Dr. Baodong Liu
Executed on: June 7, 2026

Appendix 1

Curriculum Vitae

Baodong Liu, Ph.D.
Presidential Societal Impact Scholar
Professor (with Tenure) in Political Science and Ethnic Studies
University of Utah
260 S. Central Campus Drive, Room 3231, Salt Lake City, UT 84112
Tel: Office (801) 585 7987; Fax: (801) 585 6492
baodong.liu@utah.edu

PROFESSIONAL EXPERIENCE

Professor of Political Science and Ethnic Studies, affiliated with Asian Studies, 2008-present

Director of Graduate Studies, Political Science Department, 2023-present

Associate Chair, Political Science Department, 2015-2017

Interim Director, Ethnic Studies Program, 2011-2013

University of Utah

Courses taught: Advanced Quantitative Methods (graduate), American Political Behavior (graduate), Teaching Political Science (graduate), Race and Political Volatility in the US (graduate/undergraduate), Voting, Election and Public Opinion, Racial and Ethnic Politics, Political Analysis, Asian American Contemporary Issues, Social Justice and Inequality, Asian Pacific American Experiences, Methodology in Ethnic Studies.

TRISS Endowed Professor in Political Science, 2007-2008

Associate Professor (early promotion to associate professor 2005, early tenure 2006)

Assistant Professor, 2002-2005

Department of Political Science

University of Wisconsin-Oshkosh

Courses taught: Race and Ethnicity in American Politics, Politics of Urban Growth, Political Method, State and Local Government, Political Analysis, American Government, National, state and Local Government.

Assistant Professor of Political Science

Department of Political Science

Stephens College, Columbia, Missouri, 1999 - 2002

Courses taught: Urban and Minority Politics, Legislative Process, American Presidency, Campaigning and Lobbying, Macroeconomics, American Government, and Introduction to Statistics.

Expert Witness, Principal Investigator, Consultant, Opinion Writer/Commentator, 2000-present

Provided research services to NAACP LDF, Southern Poverty Law Center, the US Department of Justice, New America, Mexican American Legal Defense and Educational Fund, Navajo Nation, Native American Rights Fund, Southern Coalition for Social Justice, National Science Foundation, Lawyers' Committee for Civil Rights Under Law, Florida State Legislature, Illinois State Legislature, Wisconsin Security Research Consortium, Fond du Lac School District, Johnson Controls, Inc, City of Waupaca (WI), and Wisconsin Public Service, among others.

Served also as a commentator and/or opinion writer for Salt Lake Tribune, ABC4News, Hinkley Forum, NPR, AP, Daily Utah Chronicle, ETtoday, Chinese Americans, Milwaukee Sentinel Journal, Daily Caller, KSL, among other media outlets.

EDUCATION

Ph.D. in Political Science (1999), University of New Orleans, Louisiana

Dissertation: *Black Candidates, White Voters and Racial Context*

Winner of Byran Jackson Award, Urban Politics Section, American Political Science Association, and Winner of Ted Robinson Award for the best research in race and ethnicity, Southwestern Political Science Association

M.A. in *Political Science* (1995), Oklahoma State University, Stillwater, Oklahoma

LL. B (1987), The East China University of Political Science and Law, Shanghai, China

Post-Doctoral Educational Program Participant

National Science Foundation's "Local Elections in America Project Workshop," Macalester College, Saint Paul, MN (2009)

Methodological Issues in Quantitative Research on Race and Ethnicity, Inter-University Consortium for Political and Social Research (ICPSR), University of Michigan (2006)

Mapping Your City with GIS Workshop, New Urban Research, Madison, Wisconsin (2005)

Jessie Ball duPont Summer Seminars for Liberal Arts College Faculty, the National Humanities Center, Research Triangle, North Carolina (2001)

PROFESSIONAL PUBLICATIONS (contribution is in the order of authors for publications with multiple authors).

A) Books

Liu, Baodong. (2023). *Political Volatility in the United States: How Racial and Religious Groups Win and Lose*. Lexington Books. Reviewed by Stefanie Chambers (2024) for *The Journal of Race, Ethnicity, and Politics*. Also reviewed by *Choice*.

Liu, Baodong. Ed. (2nd edition, 2023). *Solving the Mystery of the Model Minority: The Journey of Asian Americans in America*. Cognella Academic Publishing. (2018 First Edition).

Liu, Baodong. (2016). *Race, Ethnicity and Religion in the American Political Arena*. University Readers.

Liu, Baodong. (2015). *Social Research: Integrating Mathematical Foundations and Modern Statistical Computing*. Cognella Academic Publishing.

Liu, Baodong. (2013). *Understanding the Scientific Method: A Social Science Approach*. University Readers.

Liu, Baodong. (2010). *The Election of Barack Obama: How He Won*. Palgrave Macmillan. Reviewed by Hanes Walton, Jr. (2012) for *The American Review of Politics*.

Liu, Baodong and James Vanderleeuw. (2007). *Race Rules: Electoral Politics in New Orleans, 1965-2006*. Lexington Books. Paperback and Hardback. Reviewed by Peter Burns (2008) for *Urban Affairs Review*; also reviewed by Robert Dupont (2008) for *H-Urban*.

Liu, Baodong. (2002). *Making American Democracy Work: Reforms and Debates*. The McGraw-Hill, Inc.

B) Blind Peer-Reviewed Journal Articles

Liu, Baodong, Porter Morgan and Dimitri Kokoromytis. (2022) "Immigration, Nation-State Contexts and Value Changes of Ethnic Chinese" *Athens Journal of Social Sciences* 9(1):31-54.

Liu, Baodong, Zachary Stickney, and Nicole Batt. (2020). "Authoritarianism for and against Trump," *Journal of Behavioral and Social Sciences* 7(3): 218-238.

Liu, Baodong. (2018). "The Haitian and Cuban American Electorates in South Florida: Evidence from Ten Federal, State and Local Elections, 2008-2014." *National Political Science Review* 19 (1): 51-60.

Wei, Dennis, Weiyi Xiao, Christopher Simon, Baodong Liu, Yongmei Ni. (2018). "Neighborhood, Race and Educational Inequality." *Cities* 73: 1-13.

Simon, Christopher A., Nicholas P. Lovrich, Baodong Liu, and Dennis Wei. (2017). "Citizen Support for Military Expenditure Post 9/11: Exploring the Role of Place of Birth and Location of Upbringing." *Arm Forces and Society* 44 (4): 688-706.

Liu, Baodong, Dennis Wei, and Christopher A. Simon. (2017). "Social Capital, Race, and Income Inequality in the United States." *Sustainability* 9 (2): 1-14.

Liu, Baodong. (2014). "Post-Racial Politics? Counterevidence from the Presidential Elections, 2004-2012." *Du Bois Review: Social Science Research on Race* 11(2): 443-463.

Liu, Baodong. (2014). "Racial Context and the 2008 and 2012 US Presidential Elections." *Athens Journal of Social Sciences* 1(1): 21-33.

Liu, Baodong. (2011). "Demystifying the 'Dark Side' of Social Capital: A Comparative Bayesian Analysis of White, Black, Latino, and Asian American Voting Behavior." *The American Review of Politics* 32 (Spring): 31-56.

Byron D'Andra Orey, L. Marvin Overby, Pete Hatemi and Baodong Liu. (2011). "White Support for Racial Referenda in the Deep-South." *Politics & Policy* 39 (4): 539-558.

- Geoffrey M. Draper, Baodong Liu, and Richard F. Riesenfeld. (2011). "Integrating Statistical Visualization Research into the Political Science Classroom." *Information Systems Education Journal* 9 (3): 83-94.
- Liu, Baodong. (2011). "Obama's Local Connection: Racial Conflict or Solidarity?" *PS: Political Science and Politics* 44 (1): 103-105.
- Liu, Baodong. (2011). "State Political Geography and the Obama White Vote." *World Regional Studies* 20 (4): 1-15. (in Chinese)
- Liu, Baodong, Sharon D. Wright Austin, and Byron D'Andrá Orey. (2009). "Church Attendance, Social Capital, and Black Voting Participation" *Social Science Quarterly* 90 (3): 576-92.
- Vanderleeuw, James, Baodong Liu, and Erica Nicole Williams. (2008). "The 2006 New Orleans Mayoral Election: The Political Ramifications of a Large-Scale Natural Disaster." *PS: Political Science and Politics* 41 (4): 795-801.
- Liu, Baodong and Robert Darcy. (2008) "Race, Immigration, and Party Strategies in the US Elections," *Íslenska Leiðin*: 33-39.
- Liu, Baodong. (2007). "EI Extended Model and the Fear of Ecological Fallacy", *Sociological Methods and Research* 36 (1): 3-25.
- Liu, Baodong. (2006). "Whites as a Minority and the New Biracial Coalition in New Orleans and Memphis," *PS: Political Science and Politics* 40 (1): 69-76.
- Vanderleeuw, James, and Baodong Liu. (2006). "Racial Polarization or Biracial Coalition? An Empirical Analysis of the Electoral Coalition of Winning Candidates in Urban Elections," *American Review of Politics* 27 (Winter): 319-344.
- Liu, Baodong, and James Vanderleeuw. (2004). "Economic Development Priorities and Central City/Suburb Differences," *American Politics Research* 32 (6): 698-721.
- Vanderleeuw, James, Baodong Liu, and Greg Marsh. (2004). "Applying Black Threat Theory, Urban Regime Theory, and Deracialization: The Memphis Mayoral Elections of 1991, 1995, and 1999," *Journal of Urban Affairs* 26 (4): 505-519
- Liu, Baodong, and James Vanderleeuw. (2003). "Growth Imperative, Postmaterialism and Local Decision-Makers," *Journal of Political Science* 31: 173-96.
- Liu, Baodong. (2003). "Deracialization and Urban Racial Context," *Urban Affairs Review* 38 (4): 572-591.
- Vanderleeuw, James and Baodong Liu. (2002) "Political Empowerment, Mobilization, and Black-Voter Rolloff," *Urban Affairs Review* 37 (3): 380-96.
- Liu, Baodong. (2001). "The Positive Effect of Black Density on White Crossover Voting: Reconsidering the Social Interaction Theory," *Social Science Quarterly* 82 (3): 602-615.

Liu, Baodong. (2001). "Racial Context and White Interests: Beyond Black Threat and Racial Tolerance," *Political Behavior* 23 (2): 157-80.

Liu, Baodong, and James Vanderleeuw. (2001). "Racial Transition and White-Voter Support for Black Candidates in Urban Elections," *Journal of Urban Affairs* 23 (3/4): 309-22.

Liu, Baodong. (2001). "Interests and Opinions among African-Americans: A Test of Three Theories," *the Texas Journal of Political Studies* 21 (2): 113-24.

Liu, Baodong, and James Vanderleeuw. (1999). "White Response to Black Political Power: the Case of New Orleans, 1980-1994." *Southeastern Political Review* 27 (1): 175-188.

C) Book Chapters and other Peer-reviewed Articles

Engstrom, Richard and Baodong Liu. (2025). "Expert Witness Testimony," Encyclopedia of Social Measurement.

Liu, Baodong, Nadia Mahallati, and Charles Turner. (2021). "Ranked-Choice Voting Delivers Representation and Consensus in Presidential Primaries" Available at SSRN: <https://ssrn.com/abstract=3822879> or <http://dx.doi.org/10.2139/ssrn.3822879>

Liu, Baodong. "The Growth of Scientific Knowledge through Social Computing Networks" (2021). *The 19th International E-Society Conference Proceedings*. Pp.109-116. Also available at <https://www.iadisportal.org/digital-library/the-growth-of-scientific-knowledge-through-the-social-computing-networks>

Liu, Baodong, Nadia Mahallati, and Charles Turner. (2021). "Ranked-Choice Voting Delivers Representation and Consensus in Presidential Primaries", <https://www.newamerica.org/our-people/baodong-liu/> (brief)

Liu, Baodong. (2014). "Racial Context and the 2008 and 2012 US Presidential Elections" in Yannis A. Stivachtis and Stefanie Georgakis Abbott, ed. *Addressing the Politics of Integration and Exclusion: Democracy, Human Rights and Humanitarian Intervention*. Athens: Atiner publications. (Also published in *Athens Journal of Social Sciences*.)

Liu, Baodong. (2011). "Mayor" in *International Encyclopedia of Political Science*. CQ Press.

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Liu, Baodong and Carolyn Kirchhoff. (2009) "Mayor", *Encyclopedia of American Government and Civics*, eds. Michael A. Genovese and Lori Cox Han. New York: Facts on File.

Liu, Baodong and Robert Darcy. (2006). "The Rising Power of Minorities and the Deracialization of U.S. Politics" in Gillian Peele, Christopher J. Bailey, Bruce E. Cain, and B. Guy Peters, ed. *Developments in American Politics* 5. Hampshire, UK: Palgrave Macmillan/Macmillan Publishers.

D) Book Reviews

Liu, Baodong. (2010). Review of Zoltan L. Hajnal, “America’s Uneven Democracy: Race, Turnout, and Representation in City Politics” in *American Review of Politics* 31 (summer): 157-160.

Liu, Baodong. (2008). Review of Rodney E. Hero, *Racial Diversity and Social Capital*, in *Urban Affairs Review* 44 (1):146-149.

Liu, Baodong. (2006). Review of Peter Burns, *Electoral Politics Is Not Enough*, in *American Review of Politics* 27 (Spring): 186-189.

Liu, Baodong. (1999). Review of Terry Nichols Clark and Vincent Hoffmann-Martinot (ed), “The New Political Culture,” in *American Review of Politics* 20: 99-102.

E). Other Publications/Editorials

Liu, Baodong. (2021). “Asian Americans and Minority Voters: The New Destination of Partisan Competitions?” ETtoday. January 8, 2021. (in Chinese/Taiwanese)

Liu, Baodong. (2020). “U Professor Shows Which States Have Strict or Lenient Voting Rights Laws.” Daily Caller, @U, October 8, 2020.

Liu, Baodong. (2020). “Checks and Balances and the End of Trump Legal Battles”. ETtoday. Dec. 29, 2020. (in Chinese/Taiwanese)

Liu, Baodong. (2020). “Trump’s Legal Battles and the New Beginning of the Electoral Laws?”. ETtoday. Nov. 10, 2020. (in Chinese/Taiwanese)

Liu, Baodong and Feng Ling. (2018). “Liberalism or Conservatism: Which One Contributes to America More?” *Chinese Americans*, No. 1565. (in Chinese).

Liu, Baodong. (2018). “The Lawsuit against Harvard and Asian-American Attitude toward Affirmative Action,” *Chinese Americans*, No. 1207. (in Chinese).

Liu, Baodong. (2016). “Lu Xun’s Attack on Old Chinese Regime and St. Augustine’s Self Examination,” *Overseas Campus* (in Chinese).

Liu, Baodong. (2015). “Will Christianity Bring about Democracy?” *Overseas Campus* 130 (June): 40-43. (in Chinese)

Liu, Baodong. (2011). “New Ethnic Studies Major at the U: Education for the 21st Century” *Diversity News* 2011 (Fall). <http://diversity.utah.edu/newsletter/fall-2011/ethnic-studies-degree.php>.

Liu, Baodong (2008). “The Urban Politics Field as We Know It.” *Urban News* 22 (1): 1-2.

Liu, Baodong. (2008). “Negative Campaigning a Desperate Strategy,” *The Daily Utah Chronicle*. Guest Column. October 20, 2008.

Liu, Baodong. (2007). "The 2006 Midterm Election: Angry Voters? Yes! Clear Vision? No!" *Wisconsin Political Scientist* XIII (2): 9-10.

Liu, Baodong. (2006). "Midterm Election Results Show No Clear Future Vision." Guest Column, *Advance-Titan*. Nov. 9, 2006: A5.

Liu, Baodong and James Vanderleeuw. (2003). "Local Policymakers and Their Perceptions of Economic Development: Suburbs, Central Cities and Rural Areas Compared" *Wisconsin Political Scientist* IX (1): 4-7.

SOFTWARE DEVELOPMENT/GRANTS

Founder, www.easystates.com, a free web application and database of U.S. state politics with more than 1000 variables and back to 1790s that empowers students and public to visualize and statistically analyze data on US politics (written in Python), 2021-present

diaglm, the author of the R software statistical package for diagnosing and visualization of violations of linear and nonlinear statistical modeling, published at GitHub (bblpo/diaglm). 2019.

diagglm, the author of the R software statistical package for diagnosing and visualization of violations of nonlinear statistical modeling, published at github (bblpo/diagglm). 2019.

Principal Investigator, with Co-Pi, Mike Cobbs (North Carolina State University) and Richard Engstrom (University of Houston). "Understanding the Support for Ranked-Choice Voting," initial grant proposal supported by Political Reform Program, New America. Washington D.C. 2020. \$40,000

Principal Investigator, "Authoritarianism in the Global Ethnic Chinese Communities", a grant proposal supported by University Sabbatical Leave and Asia Center Travel Award. 2020. \$1500

Co-PI, with Dennis Wei (PI) and Chris Simon. "Amenity, Neighborhood and Spatial Inequality: A Study of Salt Lake County," Interdisciplinary Research Pilot Program (IRPP), College of Social and Behavioral Science, the University of Utah, 2015. \$10,000.

Co-PI, with Daniel McCool. "The Efficacy of American Indian Voting: A Pilot Project"

Research Incentive Grant, College of Social and Behavioral Science, the University of Utah. (2014-2015). \$7500.

Expert Instructor, Racially Polarized Voting in Federal Voting Rights Cases. NAACP LDF Convention. 2021.

Expert Instructor, Quantitative Analysis of Racially Polarized Voting, Native American Rights Fund Training Program. 2021.

Expert Instructor, Racially Polarized Voting and Political Participation: EI and EZI. Expert Preparation Program, Community Census and Districting Institute. A grant supported by Ford Foundation and Southern Coalition for Social Justice, Duke University, Durham, North Carolina. 2010.

Principal Investigator, 2010-2012. A Multi-level Analysis of Obama Racial Coalition in 2008 and 2012. A project funded by the PIG grant of College of Social and Behavior Sciences, the University of Utah.

Recipient, Faculty Sabbatical Grant, 2008. University of Wisconsin Oshkosh, grant offered, but finally declined the offer due to job change.

Grant Director/Faculty Advisor, 2008. The WiscAMP program, National Science Foundation.

Principal Investigator, 2007. Wisconsin Research and Development Capacity Study. A project funded by Wisconsin Security Research Consortium.

Principal Investigator, 2007. The Impact of Industrial Involvement on Science Education in Wisconsin. A project funded by Johnson Control, Inc.

Principal Investigator, 2007. The Impact of Fond du Lac School District on Local Economic Development. A project funded by Fond du Lac School District.

EI Methodologist, 2007. Retrogressive Effects of H.B. No. 1565 on Latino Voters in the Bexar County Metropolitan Water District, TX.

Principal Investigator, 2006. The Impact of Economic Development on Citizen Opinions. A project funded by City of Waupaca, Wisconsin Public Services.

Principal Investigator, 2006. Leading the Big Easy: Will the Biracial Coalition Sustain Katrina? Institute on Race and Ethnicity, University of Wisconsin System. 2006.

Methodological Issues in Quantitative Research on Race and Ethnicity, Inter-University Consortium for Political and Social Research (ICPSR), Institute of Social Research, University of Michigan, 2006.

Off-Campus Program Grant, Faculty Development, the University of Wisconsin-Oshkosh, 2006.

GIS and Social Research, Small Research Grant, Faculty Development Program, the University of Wisconsin-Oshkosh, 2005.

Principal Investigator, Getting the White Votes. American Political Science Association Research Grant, Washington D.C., 2003.

Principal Investigator, A Comparative Study of Urban Elections. Faculty Research Development Grant, the University of Wisconsin-Oshkosh, Oshkosh, Wisconsin, 2004.

Principal Investigator, Getting the White Votes. Faculty Research Development Grant, the University of Wisconsin-Oshkosh, Oshkosh, Wisconsin, 2003.

Advanced Graduate Student Travel Grant, the American Political Science Association, 1999

AWARDS AND HONORS

Winner of Presidential Societal Impact Scholar, University of Utah, January 20, 2024

“Baodong Liu and His Role in Landmark Voting Rights Case,” Brian Maffly, @THEU, July 21, 2023.

“People’s Voice: Ranked-Choice Voting Manifests Voter Values”, *University of Utah Magazine*, Fall 2021 (a piece covering my research findings and grant on ranked-choice voting)

Nominee for the Career & Professional Development Center, Faculty Recognition Program, University of Utah. 2018.

Winner of A Showcase of Extraordinary Faculty Achievements (for publication of my book, Social Research: Integrating Mathematical Foundations and Modern Statistical Computing. San Diego: Cognella Academic Publishing), With commendation from the J. Willard Marriott Library and the Office of the Vice President for Research. University of Utah. 2016

Nominee for the Social and Behavior Science College Superior Research Award (senior scholar category), nominated by the political science department in both 2011 and 2012.

TRISS Endowed Professorship for Excellence, University of Wisconsin Oshkosh, 2007-8

Artinian Award for Professional Development, Southern Political Science Association, 2004

Byran Jackson Award for the best research/dissertation in racial and ethnic politics in an urban setting, Urban Politics Section, the American Political Science Association, 1999

Ted Robinson Award for the best research in race and ethnicity, Southwestern Political Science Association, 1999

Who’s Who in America, 2001-2006, Marquis, USA.

Davis Summer Research Grant, Stephens College, 2001

Firestone Baars Grant for Faculty Development, Stephens College, 1999-2001

Vice President Discretion Grant for Research, Stephens College, 2001, 2000

Advanced Graduate Student Travel Grant, the American Political Science Association, 1999

Graduate Student Travel Grant, University of New Orleans, 1997

The Best Graduate Student Paper Award, Department of Political Science, Oklahoma State University, 1993

Pi Sigma Alpha, National Political Science Honor Society, 1994

PROFESSIONAL POSITIONS

Member, Review Board, *Journal of Behavioral and Social Sciences*. 2019-present

Chair, Political Methodology Section, Southern Political Science Association, 2022-2023

Member, Board of Directors, National Association for Ethnic Studies, 2013-2015

Editorial Board, *Urban Affairs Review*, 2008-2011

Editorial Advisor, International Encyclopedia of Political Science, CQ Press, 2005-2011

Editor, Urban News, Urban Politics Section, American Political Science Association, 2004-2010

Chair, Urban Politics Program, Southern Political Science Association Annual Convention, 2008

Co-Chair, Asian Pacific American Caucus, American Political Science Association, 2004-2006

Member, American Political Science Association Small Research Grant Committee, 2005

AS A JUDGE OR REVIEWER OF WORKS OF OTHER SCHOLARS FOR ACADEMIC JOURNALS OR PRESSES

2001-present

Perspectives; Politics and Religion; American Political Science Review; Lexington Books; Journal of Behavioral and Social Sciences; The National Science Foundation; Sage Publications, W. W. Norton & Company, Inc; McGraw Hill Publishing; Journal of Politics; National Political Science Review, Political Analysis; Social Science Quarterly; Urban Affairs Review; Political Research Quarterly; Politics and Policy; Journal of Urban Affairs; American Politics Research; Public Opinion Quarterly; Political Behavior; Sociological Methods and Research

PROFESSIONAL AND COMMUNITY SERVICES

Member, Executive Committee, Political Science, 2023-present

Member, College Faculty Tenure and Promotion Committee, 2022-2023

Chair, Faculty Tenure and Promotion Committee, Ethnic Studies Program, 2022-2023

Co-Chair, EDI Committee, Political Science, 2022-2023

Member, European Consortium for Political Research, 2022-present

Judge, Graduate Student Research Day, College of Social and Behavioral Science, 2021

Reviewer, University **URC Faculty Scholarly Grant Program, 2020**

Chair, Faculty Tenure and Promotion Committee, Political Science, 2019-2020

Member, Curriculum Overhaul Committee, Ethnic Studies, 2018-2019

Member, Faculty Tenure and Promotion Committee, Political Science, 2018-2019

Chair, Faculty Tenure and Promotion Sub-Committee, Ethnic Studies, 2017-2018

Member, Graduate Committee, political science department, the University of Utah, 2014-2018

Member, Executive Committee, political science department, the University of Utah, 2014-2018

Faculty Senator, the University of Utah, 2015-2018

Chair, American Politics Field, political science department, the University of Utah, 2014-2018

Member, GC Building Committee, Social Science Lab, 2015-2018

Expert Volunteer for Utah Fair Redistricting Legal Team, 2017

Member, Assistant Vice President for Diversity Search Committee, 2015-2016

Member, Ad Hoc Graduate Committee for Writing, 2015-2016

Chair, Faculty Joint Appointment Search Committee, ethnic studies program and theatre department, the University of Utah, 2014-2015

Member, Betty Glad Foundation Committee, political science department, the University of Utah, 2014-2015

Chair, Awards Committee, National Association for Ethnic Studies, 2014

Faculty Mentor to Junior Faculty, Department of Political Science, 2013-2018

Chair, University of Utah MLK Committee. 2012-2013.

Member, Graduate School Dean Search Committee, 2013.

Member, University Diversity Leadership Team, the University of Utah. 2010-2013.

Member, University Teaching Program Committee, the University of Utah, 2011-2013.

Member, University Diversity Curriculum Committee, Undergraduate Studies, the University of Utah, 2011-2013.

Judge, The Research Day of College of Social and Behavioral Science, 2011-2013.

Member, Organizing Committee, International Conference on Urbanization and Development in China, University of Utah, August 2010.

Member, Retention, Promotion, and Tenure Committee, Department of Political Science, the University of Utah. 2011-2013.

Assistant Director, Ethnic Studies Program, the University of Utah. 2010-2011.

Committee Member, Undergraduate Studies, Department of Political Science, the University of Utah. 2009-2011.

Committee Member, Utah Opportunity Scholarship, the University of Utah, reviewing and making decisions on more than 200 applications. 2009-2010.

Member, Ethnic Studies Positions Exploration Committee, the University of Utah. 2009-2010.

Member, Marketing Committee, Department of Political Science, the University of Utah. 2009-2010.

Guest Speaker, “Obama and the 2008 Presidential Election: A Spatial Analysis” at the Graduate Seminar titled Introduction of Survey Research in Higher Education. College of Education. The University of Utah. Feb. 3, 2009.

Special Speaker, “Obama and the Minimum Winning Coalition” Ethnic Studies Works in Progress Presentation. The University of Utah. Dec., 5, 2008.

Special Speaker, “Election 2008: A Symposium,” Hinckley Institute of Politics, University of Utah. October 6, 2008.

Special Speaker, “Predicting the 2008 Presidential Election Outcomes” Political Science Department, the University of Utah. Sept. 25, 2008.

Political Commentator for reporting from Salt Lake Tribune, AP, EFE Hispanic News Services, Milwaukee Journal Sentinel, WHBY, KFRU radio stations, the Post-Crescent, Oshkosh Northwestern, Columbia Missourian, and the Daily Utah Chronicle. December 1999 to present.

Faculty Representative for University of Wisconsin-Oshkosh, ICPSR, University of Michigan, 2007-2008

Member, Board of Trustees, Wisconsin International School, 2007-2008

Member, UWO Office of Institutional Research Advisory Board, 2007-2008

President, Northeast Wisconsin Chinese Association, 2007 (executive vice president, 2006)

Member, Program Evaluation Committee. College of Letters and Science, University of Wisconsin-Oshkosh, 2007-2008

Member, Political Science Curriculum, Center for New Learning, University of Wisconsin-Oshkosh, 2007-2008

Moderator, Oshkosh City Forum, Mayoral Candidates’ Debates, March 23, 2005

Grant Reviewer, Faculty Development Program. University of Wisconsin-Oshkosh, 2004-2008

Member, African American Minor Counsel. University of Wisconsin-Oshkosh, 2006-2008

Member, Search Committee for University Foundation President. University of Wisconsin-Oshkosh, 2005-2006.

Member, Faculty Senate Libraries & Information Services Committee. University of Wisconsin-Oshkosh, 2005-2008.

Chair/Member, Curriculum Committee, Dept. of Political Science, University of Wisconsin-Oshkosh, September 2002-2008.

Chair, Budget Committee, Dept. of Political Science, University of Wisconsin-Oshkosh, September 2007-2008.

Member, Personal Committee, Dept. of Political Science, University of Wisconsin-Oshkosh, September 2007-2008.

Member, Search Committee, Dept. of Political Science, University of Wisconsin-Oshkosh, September 2002-2008.

Faculty Director, the Stephens College Model UN Team, National Model United Nations Conference, New York, New York, March, 2002.

Chair, Political Science Search Committee, Stephens College. August 2001 to May 2002.

Member, Editorial Advisory Board, Collegiate Press, San Diego, California. 2000 to 2001.

Chair, Harry Truman Scholarship Committee, Stephens College. 2000 to 2002.

Member, Strategic Planning and Budgeting Committee, Stephens College. 2000 to 2002.

CONFERENCE PAPER/PROCEEDINGS

Liu, Baodong, Shikai Feng, Robert Kirby. “Considering Compulsory Voting through the Lens of Data-driven AI/ML-based Modeling”, paper presented at the 2025 American Political Science Association Annual Conference. Vancouver, Canada, September, 2025.

Liu, Baodong. “Roundtable on Baodong Liu’s New Book, Political Volatility in the United States: Author Meets Critics”, Southern Political Science Association. St. Pete Beach, Florida. January, 2023.

Liu, Baodong and Richard Engstrom. “Ranked Choice Voting and the Minority Voting Rights” paper presented at the American Political Science Association Annual Conference. Seattle. September, 2021.

Liu, Baodong. “The Growth of Scientific Knowledge through Social Computing Networks” paper presented at the 19th International E-Society Annual Conference, 2021. (through Zoom).

Liu, Baodong, Nadia Mahallati, and Charles Turner. “Ranked-Choice Voting Delivers Representation and Consensus in Presidential Primaries.” Paper presented at the Electoral Reform Research Group Conference organized by New America, American Enterprise Institute, Center on Democracy, Development, and the Rule of Law, Stanford University and Unite America Institute, 2021. (through Zoom).

Liu, Baodong. “Racial Prejudice behind the Anti-Affirmative Action Attitude of Asian Americans,” paper presented at the Western Political Science Association Annual Conference. San Diego. April 2019.

Liu, Baodong, Porter Morgan and Dimitri Kokoromytis. “Immigration, Nation-State Contexts and Value Changes of Ethnic Chinese” paper presented at the Midwest Political Science Association Annual Conference. Chicago. April 2019.

Baodong Liu. “The Strategical Religious Voter”, paper presented at the Midwest Political Science Association Annual Meeting. Chicago, Illinois. April 2018.

Baodong Liu, Nicole Batt and Zackery Stickney. “Authoritarianism for and against Trump”, paper presented at the Annual Meeting of Behavioral and Social Sciences, Las Vegas, Nevada. February 2018.

Baodong Liu. “The Strategic Religious Voter”, paper presented at the Oxford Symposium on Religious Studies, Oxford, UK. March 2016.

Baodong Liu. “The Political Fate of Religious Minorities in the U.S. Presidential Elections.” paper presented at the 19th Annual American Association of Behavioral and Social Sciences. Las Vegas, Nevada. February 2016.

Baodong Liu. “The Political Fate of Religious Minorities in the U.S. Presidential Elections.” paper presented at the Hawaii University International Conferences on Arts, Humanities, Social Sciences and Education. Honolulu, Hawaii. January 2016.

Baodong Liu. “Statistical Inference and Visualization of Big Data in Urban Research”, paper presented at the 3rd International Conference on China Urban Development, Shanghai, China. June 2015.

Baodong Liu. “Race, Religion, and U.S. Presidential Elections,” paper presented at the Annual Convention of National Association for Ethnic Studies, Oakland, California. April 2014.

Baodong Liu. “Racial Context and the 2008 and 2012 US Presidential Elections,” paper presented at the 11th Annual International Conference on Politics & International Affairs, Athens, Greece. June 2013.

Baodong Liu. “Deracialization in the Post-Obama Era,” presented at the National Black Political Scientist Association Annual Meeting. Las Vegas, Nevada. March 2012.

Baodong Liu. “Obama’s Racial Coalition,” paper presented at the Southwestern Social Science Association Annual Meeting. Las Vegas, Nevada. March 2011.

Geoffrey M. Draper, Baodong Liu, and Richard F. Riesenfeld. “Integrating Statistical Visualization Research into the Political Science Classroom” Information Systems Educators Conference. 2010. Nashville, Tennessee. October 2010.

Baodong Liu. “Space and Time: An Empirical Analysis of 2008 Presidential Election,” paper delivered at the Annual American Political Science Association Conference, Toronto, Canada, September 2009.

Baodong Liu. “Sequential and Spatial Voting: An Analysis of the 2008 Democratic Primaries,” paper presented at the 2009 Midwest Political Science Association Annual Conference, Chicago, Illinois, April 2009.

Baodong Liu. “Social Capital, Race, and Turnout,” paper presented at the 2008 Midwest Political Science Association Annual Conference, Chicago, Illinois, April 2008.

Baodong Liu and Lori Weber. “Social Capital and Voting Participation,” paper presented at the 2008 Southern Political Science Association Annual Meeting, New Orleans, Louisiana, January 2008.

Baodong Liu. “The 2006 New Orleans Mayoral Election,” paper presented at the 2007 Midwest Political Science Association Annual Conference, Chicago, Illinois, April 2007.

James Vanderleeuw, Baodong Liu, and Erica Williams. "The Political Ramifications of a Large-Scale Natural Disaster," paper presented at the 2006 annual conference, the American Political Science Association, Philadelphia, September 2006.

Baodong Liu. "EI Extended Model and the Fear of Ecological Fallacy," paper presented at the 2006 Midwest Political Science Association Annual Meeting, Chicago, Illinois, April 2006.

Baodong Liu. "The Fear of Ecological Fallacy and the Methods to Conquer It" paper presented at the Western Political Science Association Annual Meeting, Oakland, CA, April 2005.

Baodong Liu. "The Whites Who Stayed in the City," paper presented at the 2004 Midwest Political Science Association Annual Meeting, Chicago, Illinois, April 2004.

Baodong Liu. "Whites as a Minority and the New Biracial Coalition," paper presented at the 2004 Southern Political Science Association Annual Meeting, New Orleans, Louisiana, January 2004.

Baodong Liu and James Vanderleeuw. "Economic Development Priorities and Central City/Suburb Differences," presented at the 2003 Midwest Political Science Association Annual Meeting, Chicago, Illinois, April 2003.

James Vanderleeuw, Baodong Liu, and Greg Marsh, "Divided Leadership and Racial Reflexivity in Memphis: An Analysis of the 1991, 1995 and 1999 Mayoral Elections," presented at the 2003 Southwestern Political Science Association Annual Meeting, San Antonio, Texas, April 2003.

Baodong Liu. "White Votes Count: The Effect of Black Candidates' Qualifications on White Crossover Voting," paper presented at the 98th American Political Science Association Conference, Boston, Massachusetts, September 2002.

Baodong Liu. "Searching for a 'Qualified' Black Candidate," *Proceedings of the 97th American Political Science Association Conference*, San Francisco California, September 2001.

Baodong Liu. "In Defense of an Ethical Rational Choice Theory," paper delivered at the 2001 Jessie Ball duPont Fund Summer Seminars for Liberal Arts College Faculty, the National Humanities Center, Research Triangle, North Carolina, June 2001.

Baodong Liu. "Reconsidering Social Interaction Theory," presented at the 2001 Western Political Science Association Annual Meeting. Las Vegas Nevada, March 2001.

James Vanderleeuw, Baodong Liu, and John Johnson. "Economic Development Priorities of City Administrators: A Report on a Survey of City Administrators in Texas," presented at the 2001 Louisiana Political Science Association Convention, Lamar Texas, March 2001.

Baodong Liu. "Racial Transition: Explaining the Curvilinear Relationship between Black Density and White Crossover Voting," *Proceedings of the 96th American Political Science Association Conference*, Washington DC, September 2000.

Baodong Liu and James Vanderleeuw. "Racial Transition: Explaining the Curvilinear Relationship between Black Density and White Crossover Voting," presented at *the 96th American Political Science Association Conference*, Washington DC, September 2000.

Baodong Liu. "Electoral Law and the Russian Party System: A Comparative Study," presented at *the 58th Midwest Political Science Association Conference*, Chicago Illinois, April 2000.

James Vanderleeuw and Baodong Liu. "Rolling Off in the Context of Context," presented at *the 30th Southwestern Political Science Association Conference*, Galveston Texas, March 2000.

Baodong Liu. "The Changing Nature of Electoral Competition in Japan." Roundtable Discussant, *the 52nd Association of Asian Studies Annual Meeting*, San Diego California, March 2000.

Baodong Liu. "Racial Context and White Voting Strategies," presented at *the 95th American Political Science Association Conference*, Atlanta Georgia, September 1999.

Baodong Liu. "The President's Support in Congress: A Test of U.S. China Policy, 1980-1994," *The 1997 Southern Political Science Association Convention*, Norfolk Virginia, November 1997.

Baodong Liu. "Examining the Race Line: White Voting Behavior in New Orleans, 1980-1994," *The 27th Southwestern Political Science Association Conference*. New Orleans Louisiana, March 1997.

Baodong Liu. "Intrapartisan Defeats and the Nomination Strategies of the Japanese Liberal Democratic Party in the 1993 Election," *The Sixth Annual Graduate Student Research Symposium*. Oklahoma State University. Stillwater Oklahoma, February 1995.

INVITED SPEAKER, ROUNDTABLE/PANEL DISCUSSANT

Baodong Liu. "Aftermath of Brnovich: Modernizing Section 2 Discussion." National Panel of Asian American Advancing Justice, Washington DC. May 2024.

Baodong Liu. "Author Meets Critics Panel--Baodong Liu's newly published book, Political Volatility in the United States and its impact". Southern Political Science Association Annual Meeting. St. Pete Beach, FL. January 2023.

Baodong Liu. "The Future of Political Polls." Hinkley Forum. Hinkley Institute of Politics. 2021.

Baodong Liu. "Beyond the Bloc: Asian American Voting and Political Power." Hinkley Forum. Hinkley Institute of Politics. 2021.

Baodong Liu. "The 2020 Presidential Election and Congressional Election in Utah," live interview on TV by ABC4 News. October 2020.

Baodong Liu. "The 2020 Presidential Election and the Future of American Democracy", invited lecture given to Chinese Americans on Zoom. September 2020.

Baodong Liu, Michael Cobb, and Richard Engstrom. "Understanding the Support for Ranked-Choice Voting in Two Southern Cities" talk given at the Electoral Reform Research Group, Research Development Conference. Washington D.C. February 2020.

Baodong Liu. “Nation-State Context and Authoritarian Value Changes of Ethnic Chinese.” Talk given at the workshop of The Clash of Authoritarianisms: Secularism versus Islamism in Turkey, University of Utah. April 2019

Baodong Liu. “Trump’s Voters,” Panel Discussion on Presidential Primaries. Hinckley Institute of Politics. The University of Utah. Salt Lake City, Utah. March 2016

Baodong Liu. “Big Data in the Social Sciences,” The Consortium for Research on China and Asia (CROCA) and Policy at the Podium. The University of Utah. Salt Lake City, Utah. November 2014.

Baodong Liu. “Deracialization in the Historical Perspective,” the National Black Political Scientist Association Annual Meeting. Las Vegas, Nevada. March 2012.

“Educating the Best Students in the 21st century: the New Ethnic Studies Major at the University of Utah,” a presentation provided to the University Diversity Division Fall Retreat (March 12, 2011), the Ethnic Studies Program (August, 17, 2011), and the Community Council (September 13, 2011), at the University of Utah.

“Quantitative Analysis: Ecological Inferences and the Voting Rights Law,” a Ford Foundation Project, Duke University. July 24-28, 2010.

“Election 2008: A Symposium,” Hinckley Institute of Politics, University of Utah. October 6, 2008.

“IMMIGRATION TODAY: What are the issues?” League of Women Voters of the Oshkosh Area Public Forum, November 12, 2007.

Theme Panel: “Bleaching” New Orleans? Power, Race, and Place After Katrina, the American Political Science Association Annual Meeting, Philadelphia, September 2, 2006.

“2006 Midterm Election Preview,” American Democracy Project, the University of Wisconsin, Oshkosh, November 2, 2006.

“Analysis on the 2006 Midterm Election Results,” American Democracy Project, the University of Wisconsin, Oshkosh, November 9, 2006.

“The Politics of New Americans: Studying Asian American Political Engagement,” the American Political Science Association Annual Meeting, Washington, D.C. September 3, 2005.

“Significance of Voting Rights Act,” Lawyers’ Committee for Civil Rights under Law, National Asian Pacific American Legal Consortium, Mexican American Legal Defense and Educational Fund, Washington DC: June 17-18, 2004.

“Protecting Democracy: Defining the Research Agenda for Voting Rights Reauthorization,” the Civil Rights Project, Harvard University, Cambridge, MA. May 10, 2004.

Chair, the Politics of Ethnicity and Self-Determination Panel, International Studies Association-Midwest Conference, St. Louis, Missouri, November 2, 2001.

PROFESSIONAL MEMBERSHIP

Pi Sigma Alpha, National Political Science Honor Society
American Political Science Association
Western Political Science Association
Midwest Political Science Association
Association for Asian American Studies
Association of Chinese Political Studies
Southwestern Political Science Association

Serve as an Advisor/Committee Member for the following Graduate Students

Morgan Wilson (Ph.D Dissertation Chair)
Carolina Cabezas Vidal (Ph.D Dissertation Chair)
Nicole Batt (Ph.D Dissertation Chair)
Jake Peterson (Ph.D Dissertation Chair)
Matt Haydon (Ph.D. Dissertation Chair)
Charles Turner (Ph.D Committee)
Porter Morgan (Ph.D. Committee)
Geri Miller-Fox (Ph.D Committee)
Alex Lovell (Ph.D Committee)
Samantha Eldrudge (Ph.D Committee)
Leslie Haligan-Park (Ph.D Committee)
Emily Day (Master Committee Chair)
Nicole Cline (Master Committee Chair)
Andrew Talleh (Master Committee)
Oakley Gordon (Master Committee)
Michael McPhie (Master Committee)

Appendix 2

Voting Rights Cases in which I Served as an Expert Witness

Cara McClure, et al., v. The Jefferson County Commission, et. Al., Case No. 2:23-cv-00443-MHH (S.D. Ala. 2023).

Milligan, et al. v. Merrill, et al., Case No. 2:21-cv-01530-AMM and *Thomas, et al. v. Merrill, et al.*, Case No. 2:21-cv-01531-AMM (N.D. Ala. 2021).

Khadidah Stone et al., v. Allen et. Al., Case No. 2:21-cv-01531-AMM (N.D., Ala. 2021).

The South Carolina State Conference of the NAACP, et al., v. McMaster et al., Case No. 3-21-cv-03302-JMC-TJH-RMG (Columbia Division, S.C. 2021).

The Christian Ministerial Alliance, et al., v. Thurston, Case No. 4:23-cv-471-DPM-DRS-JM (Central Division, Ark. 2021).

Traci Jones et al v. Jefferson County Board of Education et al, (N.D. Ala. 2019).

CMA v. Arkansas, (E.D. Ark. 2019).

Alabama State Conference of NAACP v. Pleasant Grove, (N.D. Ala. 2018).

Navajo Nation, et al, v. San Juan County, et al, (D. Utah 2012).

League of Women Voters of Florida, et al v. Detzner, et al, (Fla. 2012).

Anne Pope et. al. v. County of Albany and the Albany County Board of Elections (N.D.N.Y. 2011).

Radogno, et al v. State Board of Elections, et al, (N.D. Ill. 2011).

NAACP v. St. Landry Parish et al, (W.D. La. 2003).

Arbor Hill Concerned Citizens Neighborhood Association et al v. County of Albany, (N.D.N.Y. 2003).

Hardeman County Branch of NAACP v. Frost, (Tenn. 2003).

EXHIBIT C

Declaration concerning Tennessee Congressional redistricting

Moon Duchin

June 8, 2026

1 Background and qualifications

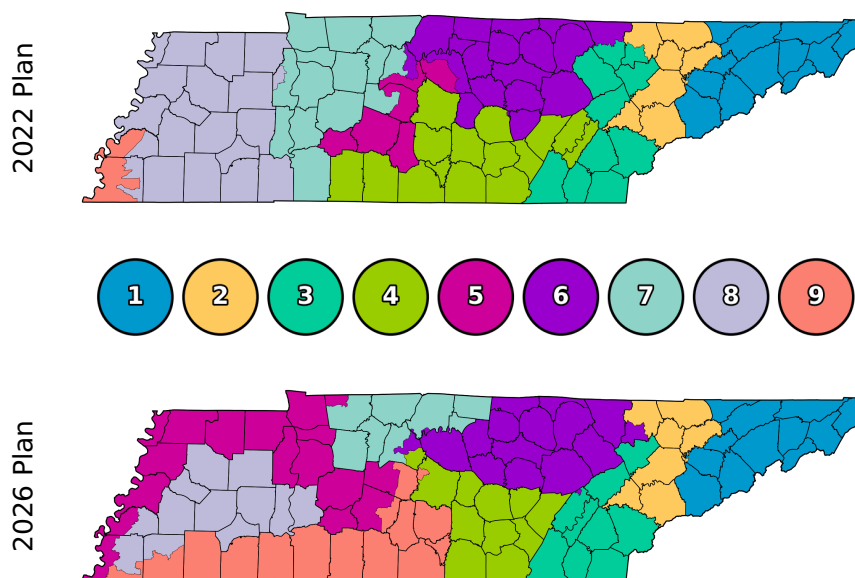
I am a Professor of Data Science and Computer Science at the University of Chicago. I hold a Ph.D. from Chicago and an A.B. from Harvard University. I have provided reports and/or testimony in numerous redistricting matters.

My general research areas are discrete geometry and the applications of mathematics and computing to the study of democratic systems. My research has had major grant support from the National Science Foundation, including a CAREER grant from 2013–2018 and a Convergence Accelerator grant from 2019–2021 entitled "Network Science of Census Data." I was elected a Fellow of the American Mathematical Society in 2017 and was named both a Radcliffe Fellow and a Guggenheim Fellow in 2018. Case citations and further professional details are available on the CV that is included with this report.

Tennessee's new Congressional districts

This report contains brief analysis of the 2026 Congressional redistricting in Tennessee.

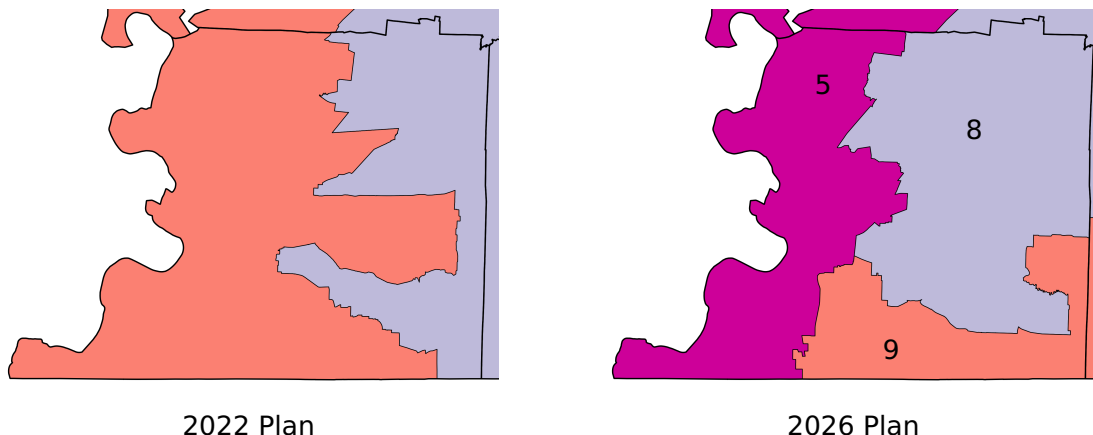
Figure 1: TN Congressional plans, before and after the 2026 redistricting.



2 Changes in Shelby County and Memphis

The May 2026 redistricting makes a significant change to the districts in Shelby County, home to Memphis. Shelby, in the far southwest corner of Tennessee, is now split across three districts; the city of Memphis is nearly evenly divided between districts 5, 8, and 9. Previously, CD 5 was about 150 miles from Memphis.

Figure 2: Shelby County used to be split across two districts, CD 8 and CD 9. In the new configuration, CD 5 reaches 150 miles across the state to extend a finger into Memphis.



The 2020 Census gave total population counts as follows. The City of Memphis had a total population of 633,104 people, within Shelby County (total population 929,744). The target population for a Congressional district is 767,871 people. This means that it is possible for Memphis to make up the greatest part of a district, and for that district to be wholly contained within Shelby County.

Indeed, something close to that was the case in Tennessee Congressional plans for decades. For instance, in the 2022 Plan, two districts touched Shelby, and their population was divided as follows.

2022 Plan.

- CD 8: 192,467 people (25% of CD 8) in Shelby, 34,375 (4% of CD 8) in Memphis.
- CD 9: 737,277 people (96% of CD 9) in Shelby, 598,729 (78% of CD 9) in Memphis.

The 9th district was represented by Steve Cohen, widely recognized as the candidate of choice for Memphis voters overall, since his initial election to Congress in 2006.

2026 Plan.

- CD 5: 221,035 people (29%) in Shelby, 212,105 (28%) in Memphis
- CD 8: 440,132 people (57%) in Shelby, 222,303 (29%) in Memphis
- CD 9: 268,577 people (35%) in Shelby, 198,696 (26%) in Memphis

After these changes to the lines, no district will have even 30% of its population in Memphis. This was done by cutting right through communities of interest and flouting traditional districting principles like compactness and county integrity.

3 Traditional districting principles

One of the major traditional principles for redistricting is to favor compact districts: those whose shape is simple rather than erratic. This is frequently measured with scores called the Polsby-Popper and Reock scores, which are "contour-based" scores of compactness for each district. **Polsby-Popper** is computed by comparing the district's area to its perimeter using the formula $4\pi A/P^2$. This can be interpreted as the ratio of the district's area to a circle with the same perimeter. **Reock** divides the district's area by the area of its smallest circumscribing circle. Both scores give a ratio of 1 for circles and fall below that for every other shape. A different kind of metric is the **cut edges** score, which is based on the geographical units rather than the map projection: it measures the "scissors complexity" of the plan by counting the number of pairs of neighboring census blocks that receive *different* district assignments. A simpler plan has a lower cut edges count.¹

Table 1: Compactness scores: all three districts touching Shelby in the 2026 Plan got far less compact than their earlier counterparts. Higher scores are better for both of these scores.

		CD 5	CD 8	CD 9
Reock	2022 Plan	.284	.585	.289
	2026 Plan	.206	.352	.171
Polsby-Popper	2022 Plan	.131	.293	.121
	2026 Plan	.090	.203	.140

The cut edges score got worse as well, for the plan as a whole, rising from 3588 to 4306. (Lower is better for cut edges.)

Finally, respect for political boundaries is universally recognized as a traditional districting principle. This can be measured by just counting how many of Tennessee's 95 counties touch more than one district, but a finer measurement would also take into account how many pieces the counties are cut into by district lines. Overall, the 2022 Plan had 10 counties split, and they were split into 21 pieces, with only Davidson split three ways. The 2026 Plan splits 12 counties, and they are split into 26 pieces—Shelby joins Davidson with a three-way split.

4 Matching plan features with randomized algorithms

4.1 Methods

Computational methods are now widely available for building random samples of districting plans that follow specified rules and priorities. I executed numerous different algorithmic runs that proposed alternative plans in a sequence of ten million steps while targeting different objectives.²

¹For a comparison of compactness scores, see Duchin and Tenner, "Discrete Geometry for Electoral Geography," *Political Geography* **109**, March 2024. doi.org/10.1016/j.polgeo.2023.103040.

²The algorithmic runs use a method called *recombination* that my research group developed for the study of redistricting. See DeFord, Duchin, and Solomon, "Recombination: A Family of Markov Chains for Redistricting," *Harvard Data Science Review* **3**(1), Winter 2021. doi.org/10.1162/99608f92.eb30390f

The three major variants are as follows:

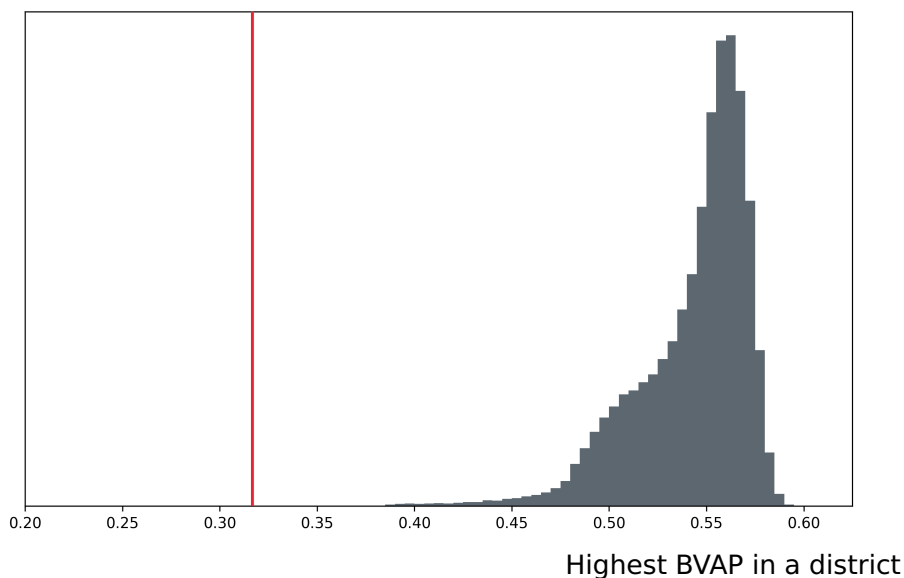
■	Neutral run:	Require contiguity and population balance; prefer compact districts. No use of race or party.
■	Partisan-targeted run:	Aim for 60% Trump share of the two-party vote in every district.
■	Race-targeted run:	Aim for an even split of Black VAP across three districts that intersect Shelby County.

I have been informed by counsel that the Tennessee legislators charged with creating the 2026 Plan have represented that only U.S. Census data was used in its construction. I note that a neutral objective (seeking only to balance population), a race-targeted objective, and a Memphis-splitting objective are all possible using Census data alone: the Decennial Census contains a Redistricting Data File (PL 94-171) that has very few data fields, essentially just counts by census block of total population and voting age population, broken down by race and ethnicity. Census data does not contain any partisan data, or any electoral data at all, so a partisan-targeted run would not be possible from this information alone.

4.2 Results of neutral runs

Tennessee is one of the few American states in which majority-Black districts are the norm under "race-blind" redistricting. In our runs, at least 88.8% of neutral plans have a majority-Black district by voting age population (i.e., majority-BVAP); by contrast, the new plan has no district exceeding 32% BVAP.

Figure 3: Over 88.8% of maps found in a ten-million step "race-blind" run have a majority-Black district.



Furthermore, districting plans constructed under neutral conditions tend to respect Memphis boundaries and minimize Shelby cuts—even without being programmed to do so—just by virtue of their location in the corner of the state. Over 99.5% of neutral plans have one or two districts touching Shelby, while the state has three (see Figure 2). An even greater number—over 99.8% of neutral plans—have one or two districts touching Memphis. As we have seen, the State’s 2026 plan cuts both the city and the county three ways, with districts extending halfway across the state.

4.3 Targeting party, targeting race

It is often said that race can be used as a proxy for party in modern American voting, and the next set of experimental trials shows that this is true in Tennessee.³

The two targeted methods (using race or using election results) produce ensembles of plans that are roughly equal in their resemblance of the partisanship in the 2026 Plan (Figure 4). That is, both aiming for partisan advantage directly and simply seeking to split up the Black population are equally effective at driving up the Republican advantage to levels similar to the 2026 Plan.

However, a large difference emerges when we compare the *demographics* in the partisan-targeted run to those in the race-targeted run (Figure 5). The 2026 Plan has all three Shelby districts between 26.5% and 32% BVAP. Partisan targeting does not produce race statistics anything like this; in fact, having three Shelby districts above 23.3% BVAP is a one percent tail occurrence when the run has a partisan aim, and the typical BVAP in the third-highest district hovers around 18%. By contrast, the median for the race-targeted run is 26.2% in that district, a near-perfect match for the 26.5% in the State’s plan.⁴

Notably, these algorithmic runs that narrowly sought partisan advantage often produced two districts over 37% BVAP, both containing significant parts of Shelby County. The 2026 Plan depresses BVAP by ten additional percentage points, significantly reducing the influence of Black voters with no measurable benefit to the partisan bottom line.

5 Conclusion

I conclude that race targeting explains the key features of the 2026 Plan to a much greater extent than partisan targeting. Despite many attempts, I could not find a way to approximate the statistics of the 2026 Plan without setting race targets in my algorithmic searches.

Whether using Census data alone, as reported by legislators, or even if incorporating election results in the mapping process, I was unable to replicate the "cracking" of the Black vote across three districts in Memphis and Shelby County. Only the use of racial targets came close to matching the features of the 2026 Plan. I very clearly find from these trials that this level of cracking is not necessary to match the partisanship of the State’s plan, but can be expected to dilute the influence of Black voters.

³In the illustrations below, I conduct three independent runs of ten million proposal steps for each type of search, then winnow the resulting plans to those with all districts favoring Trump in the 2024 election.

⁴Given the legislators’ claim of only using Census data, I also executed runs designed to split the Memphis population into three equal parts. These also failed to approximate the racial statistics of the 2026 Plan.

Figure 4: Matching the State plan's partisanship. Targeting partisanship directly or targeting race are roughly equally good ways to match the observed partisanship in the 2026 Plan. *In these box-and-whiskers plots, the districts are lettered A-I rather than numbered, emphasizing that they are ordered from lowest to highest Trump share, rather than geographically. In each column, the box extends from the 25th to the 75th percentile, the median is marked, and the whiskers extend from the 1st to 99th percentile.*

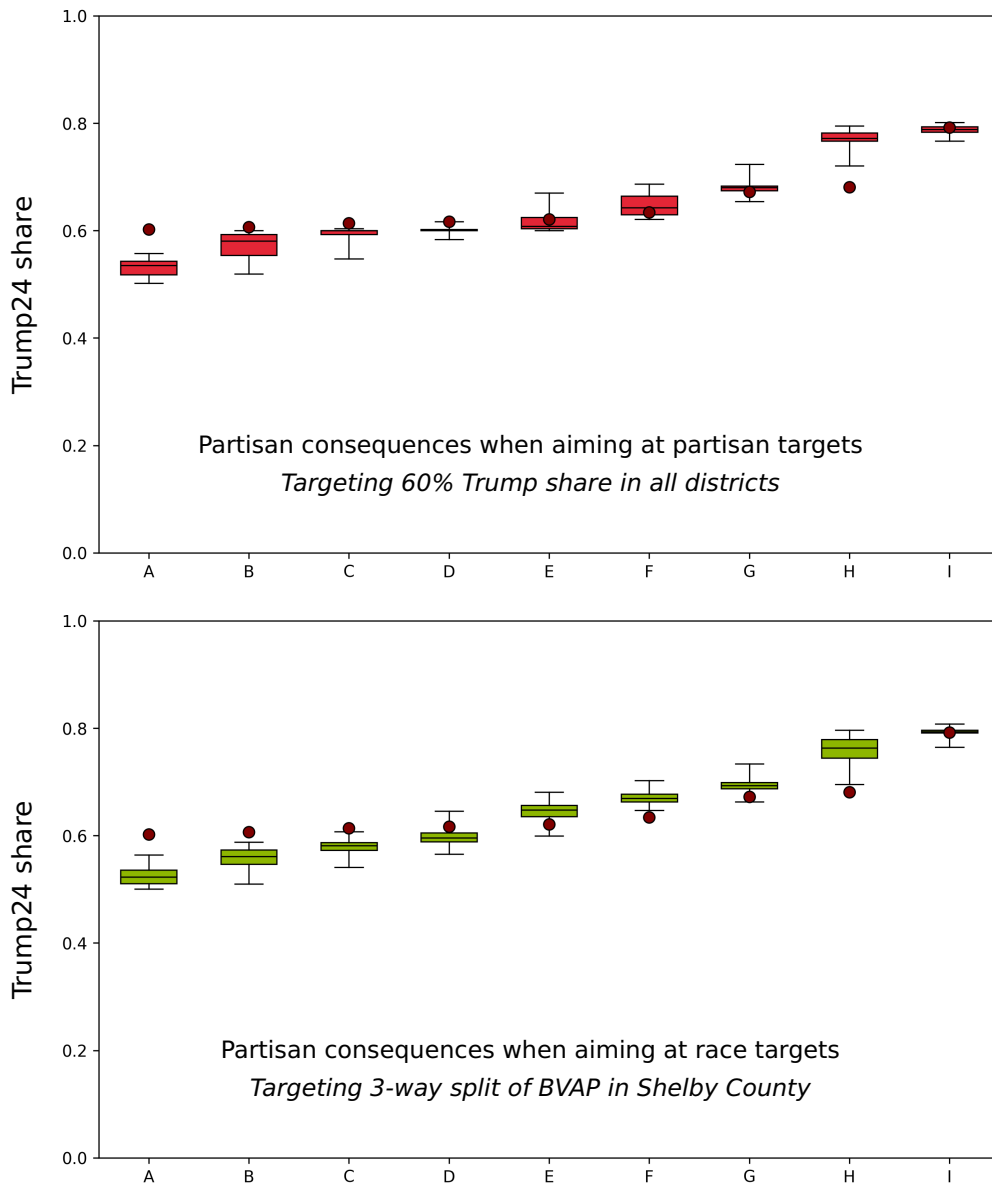
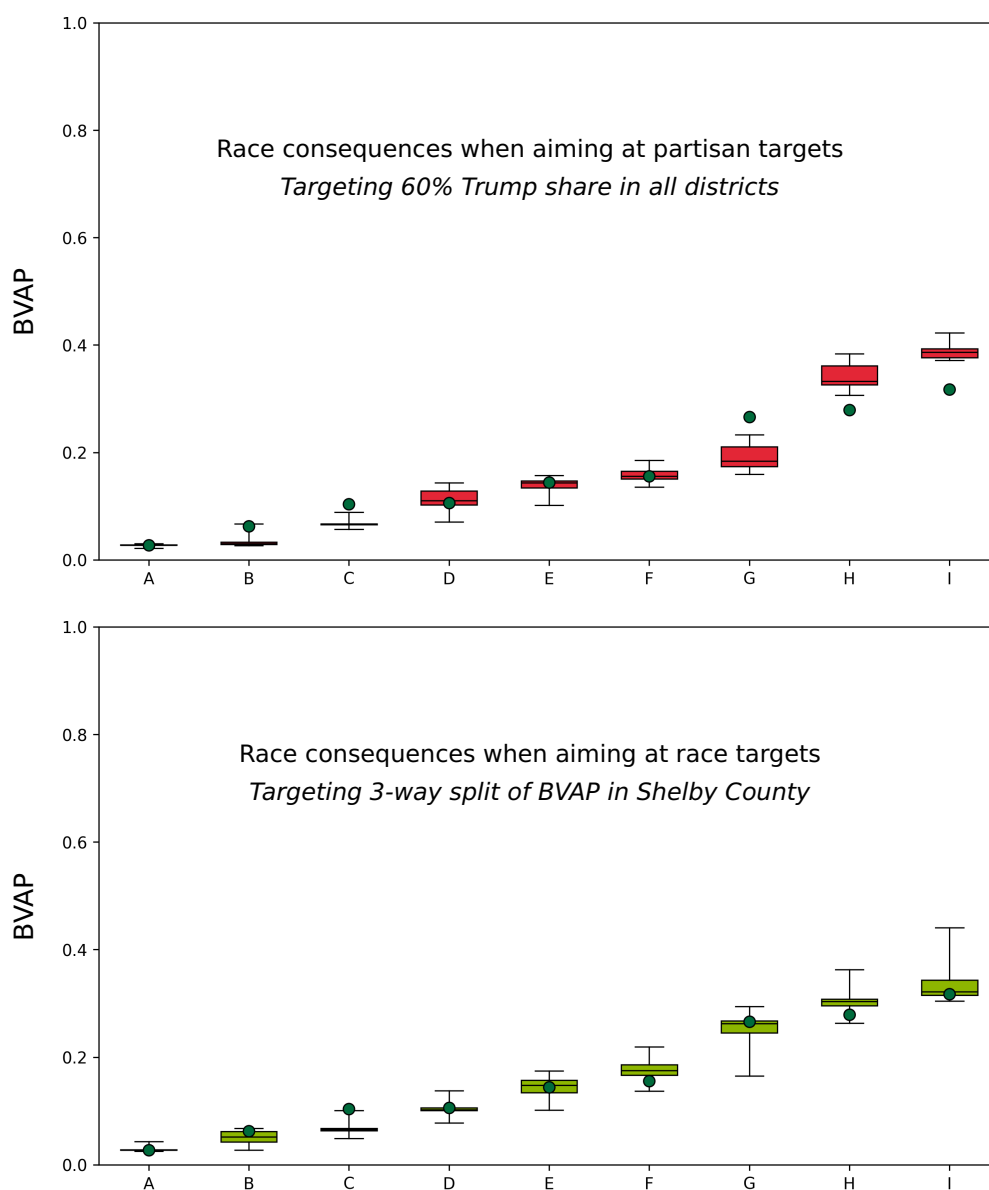


Figure 5: Comparing demographics. The race-targeted run is a close match to the State's 2026 Plan in Black voting age population (BVAP). The partisan-targeted run is far from a match in the three districts with the highest BVAP shares. *In these box-and-whiskers plots, the districts are lettered A-I rather than numbered, emphasizing that they are ordered from lowest to highest BVAP share, rather than geographically. In each column, the box extends from the 25th to the 75th percentile, the median is marked, and the whiskers extend from the 1st to 99th percentile.*



I reserve the right to modify, update, or supplement my analyses, findings, and any conclusions as additional information is made available to me or as I perform further analysis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 8, 2026 in Stamford, CT.

A handwritten signature in black ink, appearing to read "Moon Duchin", written over a horizontal line.

Dr. Moon Duchin

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiff,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

Expert Report of Dr. Traci Burch

Background and Qualifications

I am a Professor of Political Science at Northwestern University and a Research Professor at the American Bar Foundation. I also serve as Editor-in-Chief of *Law and Social Inquiry*, a peer-reviewed law and social science journal. I received my Ph.D. in Government and Social Policy from Harvard University.

I have led several large, long-term quantitative and qualitative research projects on political participation in the United States. I have participated in and coauthored several book chapters and articles that examine race, political participation, and inequality, and I am widely regarded as an expert on political behavior, barriers to voting, race and politics, and political participation. My work has been widely cited and replicated and has won several awards. I have received several grants for my work. I routinely review the work of my peers for tenure, promotion, scholarly journals, university presses, and grants and have served as a reviewer for the American Political Science Review, The American Journal of Political Science, The Journal of Politics, Political Behavior, the National Science Foundation, Cambridge University Press, Princeton University Press, the University of Chicago Press, Oxford University Press, Science Advances, and many other entities.

I am the author of several books and articles examining voter turnout and political participation, race and ethnic politics, and criminal justice using multiple methods. In particular, my articles “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida’s Ex-Felons” and “Turnout and Party Registration among Criminal Offenders in the 2008 General Election,” which appeared in the peer-reviewed journals Law and Society Review and Political Behavior, respectively, included my calculations of felony disenfranchisement and voter turnout among people with felony convictions. My academic book on the community-level effects of criminal convictions on political participation, *Trading Democracy for Justice*, was published by the University of Chicago Press and also won multiple national awards from the American Political Science Association and its sections, including the Ralph J. Bunche Award for the best scholarly work that explores the phenomenon of ethnic and cultural pluralism and best book awards from the law and politics and urban politics sections. *Trading Democracy for Justice*, along with many of my articles, relies on the analysis of large criminal justice and voter registration data files.

In addition to my published work, I have conducted analyses of legal financial obligations, re-registration after felony convictions and barriers to voting as an expert witness. I have testified in cases involving *Arlington Heights* and the Senate Factors under Section 2 of the Voting Rights Act. I have also testified before the U.S. Commission on Civil Rights about the collateral consequences of felony convictions with respect to voting and other issues.

My curriculum vitae is provided in the appendix. I am being compensated at the rate of \$400 per hour for work in this case, plus expenses. My compensation does not depend on the opinions I render. My prior expert engagements are set forth in my CV. In all cases where an opinion was issued, the courts accepted my expert testimony.

Scope of the Report

I was asked by counsel for the Plaintiffs to provide information that may be relevant to an analysis of whether the passage of HB7003 was racially discriminatory. My analysis is guided by the framework established by the Supreme Court in *Vill. of Arlington Heights v. Metro. Housing Dev. Corp.*, 429 U.S. 252 (1977). I understand that other experts will address the racially disparate impact of the new plan; I will discuss the historical background, the sequence of events leading up to the enactment of the redistricting plan, the procedural or substantive deviations from the normal decision-making process, and contemporaneous statements by the decision-makers. I also was asked to discuss the respective roles of race and partisanship generally and in Tennessee. For all analyses, I rely on sources and methods that are common in my discipline of political science, including examination of the relevant scholarly literature, survey and other data, legislative records, and other documents.

Historical Background of Black Representation in Tennessee

Throughout history, the people of Memphis repeatedly have been denied the opportunity for representation and self-governance. Tennessee, like other southern states, used several practices that limited Black electoral power. For instance, the General Assembly implemented poll taxes and banned helping illiterate voters, which caused Black registration to decline precipitously (Kousser 1973; Wright 2000). The state also allowed White primaries while violence and intimidation further limited Black voting power (Bullock and Gaddie 2009: 287). As a result, no Black people served in Tennessee's state General Assembly between 1888 and 1964.

Memphis and Shelby County were chronically denied equal representation because the Tennessee General Assembly did not redraw districts after 1901. Charles W. Baker and other Tennessee residents sued the General Assembly, arguing that they were denied equal representation ("Baker v. Carr," Supreme Court Historical Society). Although the population of Shelby County was more than 600,000, they had the same representation in the General Assembly as smaller counties—Chester County had only 8,200 residents ("Baker v. Carr," Supreme Court Historical Society). The Supreme Court held in *Baker v. Carr* that such inequality of representation was unconstitutional and could be addressed by courts. The passage of the Voting Rights Act of 1965 further increased Black registration, representation, and officeholding, primarily in heavily Black areas of the state (Bullock and Gaddie 2009). Population change also helped Black residents elect their candidates of choice: the 9th congressional district centered on Memphis, which has been a majority Black city since 1986 (Bullock and Gaddie 2009: 298), was represented by Harold Ford, Sr. from 1975 to 1996, then by his son Harold Ford, Jr. from 1997 to 2006. Representatives Ford Sr. and Ford Jr. are the only Black members of Congress elected

from Tennessee.¹ Since then, Steve Cohen, a White civil rights lawyer, has held the 9th district seat.

Recent decades have seen a gradual erosion of Black political power in Tennessee. Partisan realignment reduced the influence of Black legislators, who lost their leadership positions in state General Assembly (Franklin and Block, Jr. 2020). There are no Black Republicans in the Tennessee General Assembly, so there are no Black members in the majority of either chamber. Black legislators have reported being ignored and not having the chance to speak. Representative Johnnie Turner, because she was ignored and prevented from speaking on bills deliberated on the House floor, staged a protest in which she waved a mop covered by a yellow bag so she “could be seen” (Franklin and Block, Jr. 2020). Representative Jones reports that lack of visibility is still a problem for Black legislators today, saying, “You know, one thing I’ve noticed, I don’t know if its because I’m a person of color, or I’m Black but sometimes it seems like the Speaker doesn’t see my hand or the hands of people who look like me to speak.”²

This loss of power is consequential, because Black voters elect representatives who are responsive to their concerns, particularly regarding anti-discrimination and anti-poverty policies. In Tennessee, the Tennessee Black Caucus of State Legislators is more likely to support anti-discrimination policies and is more likely to push for legislation that helps poor and working-class communities (Franklin and Block, Jr. 2020; Wright 2000). Similarly, Steve Cohen was rated as one of the most effective Democratic lawmakers in the U.S. House, where he advocated for the passage of the first formal congressional apology for slavery and also secured millions of dollars for community projects in Memphis (Hacker et al. 2026).

The loss of political power statewide is coupled with recent, significant efforts by the Tennessee General Assembly to reduce the representation and self-governance of Memphis. The state General Assembly punished Memphis for removing Confederate monuments from public parks (Criss 2018); support for Confederate symbols and lost cause ideology has been linked to racial attitudes (Cooper et al. 2022).³ The Tennessee General Assembly also took over Memphis-

¹ “Black American Members by State and Territory.” United States House of Representatives. <https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/>

² 24:45 5/5/26 Meeting of the Ad Hoc Committee on Rules.

³ Cooper et al. write, “The primary driver of the partisan transformation of the contemporary southern Democratic and Republican coalitions then is anchored upon a racial cleavage. The near absence of a black presence in the modern Republican Party in the South allows for its adherents to embrace the Confederate past and the symbols tied to it. Conversely, the racially and ethnically diverse modern Democratic coalition, one in which African Americans comprise a plurality of its voters . . . is no longer conducive to and welcoming of Confederate sympathizers. So, through well over a hundred years of partisan change, it has finally come to pass that the party once excoriated by southern whites as responsible for the “War of Northern Aggression,” is currently home to a white majority that is now the greatest defender of a Confederate legacy originally created and perpetuated by Democrats” (Cooper et al. 2022: 103).

Shelby County Schools shortly after the passage of HB7003 (Moore 2026). The General Assembly also passed legislation to roll back traffic stop reforms passed in Memphis after Tyre Nichols, a Black man, was beaten to death by police (Matisse 2024).

In a famous incident, Representative Justin Pearson⁴ a Black representative of Memphis, along with Representative Justin Jones from Nashville, were expelled from the Tennessee House for protesting at the state capitol (Sanders and Garber 2023). A third, White female representative from Nashville who protested, Representative Gloria Johnson, was not expelled (Sanders and Garber 2023). Prior to the expulsion of Representatives Pearson and Jones, the Tennessee House had previously expelled only two members—one after a felony conviction and one after he was found to have had inappropriate sexual contact with 22 women (Sanders and Garber 2023). The respective city councils reinstated the two representatives and they were subsequently reelected in special elections.

In May of 2026, the Tennessee General Assembly acted to reduce Black political power again in the aftermath of the passage of HB7003. This time, Speaker Cameron Sexton stripped all Democratic representatives, *which includes all Black members of the TN House*, of their committee assignments for protesting HB7003 (Stockard 2026). Senator Oliver also faced sanctions, including reassignment from the Government Operations Committee, for her protest on the Senate Floor, which involved standing on her desk, holding a banner, and singing protest songs from the civil rights era.⁵

Timeline of Events Leading up to New Congressional Plan

May 4, 2026	HB7003 Filed
May 5, 2026	SB7004 Filed
May 6, 2026, 9:00am	Map made public ⁶
May 6, 2026, 9:00am	Filing deadline for regular consideration amendments to HB7003 ⁷
May 6, 2026, 1:00pm	Scheduled meeting of the Congressional Redistricting Committee ⁸

⁴ Representative Pearson is running for the district 9 seat that was changed by HB7003.

⁵ Senator Charlane Oliver. “They Snatched My Sign, Now They Want to Take Away My Pay.” <https://senatorcharlaneoliver.substack.com/p/they-snatched-my-sign-now-they-want>

⁶ 1:52:00 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

⁷ Section 60, “Amendments to Bills” <https://capitol.tn.gov/Archives/House/114GA/Publications/114th%20ES%202%20Ad%20Hoc%20Report.pdf>

⁸ Agenda. https://tnga.granicus.com/AgendaViewer.php?view_id=775&clip_id=33444

May 6, 2026, 1:15pm	Scheduled meeting of the Finance, Ways and Means Committee ⁹
May 6, 2026, 4:30pm	Scheduled meeting of the Calendar and Rules Committee ¹⁰
May 7, 2026, 9:00am	Scheduled House Floor Session ¹¹
May 7, 2026, 10:00am	Scheduled Senate Floor Session ¹²

Departures from Normal Procedures

The redrawing Tennessee's map in 2026 was itself was a departure from decades of procedure. In order to enact a new map, the General Assembly first passed HB7002, which amended the 1972 law that prohibited redrawing district lines between apportionments.¹³ Thus, the General Assembly jettisoned more than 50 years of precedent to clear the way for HB7003.

HB7003 was passed in a process that was unusually short compared with prior congressional redistricting cycles. In prior redistricting cycles, congressional maps were made available to the public twelve days prior to passage in 2022 (Brown 2022), and just over a week prior to passage in 2012 (Yue 2021). According to Senator Stevens, the map in HB7003 was made available only one day before passage on May 6th at 9am.¹⁴ Even some Republican lawmakers had not seen the proposal as of May 3rd.¹⁵ Representative Jones reiterated on May 5th that the maps had not been provided to him or other legislators.¹⁶ As a result, it was difficult for

⁹ Agenda. https://tnga.granicus.com/AgendaViewer.php?view_id=775&clip_id=33446

¹⁰ Agenda. https://tnga.granicus.com/AgendaViewer.php?view_id=775&clip_id=33447

¹¹ Agenda.

<https://wapp.capitol.tn.gov/apps/VideoCalendars/VideoCalendarOrders?CalendarID=33613&GA=114>

¹² Agenda.

<https://wapp.capitol.tn.gov/apps/VideoCalendars/VideoCalendarOrders?CalendarID=33616&GA=114>

¹³ Memorandum and Order, *Sherman et al. v Hargett et al.* United States District Court for the Middle District of Tennessee (No. 3:26-cv-00616).

¹⁴ 1:52:00 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

¹⁵ “Michele Reneau, State Representative: Special Session: I’d love to hear your thoughts.” 2026. Available online https://www.electmichele.com/post/special-session-i-d-love-to-hear-your-thoughts?fbclid=IwY2xjawRlh1xleHRuA2FlbQIxMABzcnRjBmFwcF9pZBAYMjIwMzkxNzg4MjAwODkyAAEeRKZwzKeO1pAaqjZ_G8pM3pmsXnmvkSFrl7mHXqp2K7q1S-HdX0bI2pcdDs_aem_Ac4CyVtZIT55Ga2DWLWLLw. Accessed 5 June 2026.

¹⁶ 23:55 5/5/26 Meeting of the Ad Hoc Committee on Rules. https://tnga.granicus.com/player/clip/33436?view_id=784&redirect=true

legislators to submit amendments and for the public to submit alternative plans and to provide feedback on the maps.

The opportunity to provide public comments was limited. The rules committee voted down proposals by Leader Camper and others to extend the ability of the public to evaluate maps by holding off on consideration for 72 hours after the full text, maps, and data were made available.¹⁷ The meeting of the House Redistricting Committee was scheduled for only four hours after the map was made available to the public, which provided only four hours to evaluate the demographic and political changes made to the map before the public could appear before the committee.

Democratic representatives had no opportunity to file timely amendments given the scheduling of consideration of HB7003 exactly 24 hours after the map was made public. The rules committee voted down a proposal by Representative Jones to file amendments up to one hour before session¹⁸ and instead set the deadline for amendments 24 hours before session.¹⁹ Amendments “not timely filed” require a two-thirds majority vote in order to be considered, and members speaking on such amendments are given only one minute to introduce the bill.²⁰ Representative Jones noted in reference to his Amendment 22 to HB7001 that “the reason that they’re not timely filed is that there was no way to file timely considered amendments because we were rushed through this process in less than 24 hours, given less than 24 hours to consider this map.”²¹

Statements of Legislators

Rationales for Passing HB7003

When examining the rationales for passing HB7003, it is important to recognize that the redistricting did not take place because of a court order or outcry from voters.²² In fact, Senator Jack Johnson, who sponsored both the senate companion to HB7003 and the previous map, said

¹⁷ 1:03:03 5/7/2026 House Floor Session – 3rd Legislative Day – 2nd Extraordinary Session
tnga.granicus.com/player/clip/33450?view_id=775&redirect=true

¹⁸ 5/5/26 Meeting of the Ad Hoc Committee on Rules.
https://tnga.granicus.com/player/clip/33436?view_id=784&redirect=true

¹⁹ 39:17 5/5/26 Meeting of the Ad Hoc Committee on Rules.
https://tnga.granicus.com/player/clip/33436?view_id=784&redirect=true

²⁰ 1:38:00 5/7/2026 House Floor Session – 3rd Legislative Day – 2nd Extraordinary Session
tnga.granicus.com/player/clip/33450?view_id=775&redirect=true. See also “Amendments to Bills.”

<https://capitol.tn.gov/Archives/House/114GA/Publications/114th%20ES%202%20Ad%20Hoc%20Report.pdf>

²¹ 1:03:00. 5/7/2026 House Floor Session – 3rd Legislative Day – 2nd Extraordinary Session
tnga.granicus.com/player/clip/33450?view_id=775&redirect=true

²² 2:44:04 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day
tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

that the previous map “is legal, its logical, its fair, it recognizes the regional differences among our three grand divisions, and it will give all of Tennesseans a strong voice in Washington.”²³ Representative Lamberth also agreed that the previous map was “constitutional” and had survived several legal challenges.²⁴

Legislators who presented and supported HB7003 advanced several rationales for the map. For example, Representative Lamberth said that the new map was designed to make the districts more competitive and “to have a more diverse set of voices at the table.”²⁵ Speaker Sexton said that the map was drawn based on “population and politics.”²⁶ However, in contrast to previous redistricting cycles, legislators did not consider most traditional redistricting criteria. When asked whether the map proposed by HB7003 tried to keep Memphis intact as communities of interest, Speaker Sexton said that they did not look at the boundaries of cities.²⁷ When the previous map was drawn, there was an effort to minimize splits of political jurisdictions.²⁸ Speaker Sexton would not say that compactness was considered in the design of HB7003.²⁹

It also is important to note that, despite the Supreme Court’s holding that “partisan gerrymandering claims present political questions beyond the reach of the federal courts” in *Rucho v. Common Cause* in 2019, leadership sponsoring the bill said that partisanship was not a factor in designing the previous map. When asked by Senator Yarboro whether the goal in drawing the previous congressional map was “to eliminate the prospects for a Democratic congressman to continue representing middle Tennessee and to improve the prospects of a Republican representing the entirety of the state outside of Shelby County in the United States Congress,” Senator Johnson replied, “No.”³⁰

²³ 42:25 1/20/2022 Senate Floor Session 39th Legislative Day

tnga.granicus.com/player/clip/25736?view_id=610&redirect=true

²⁴ 08:15 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

²⁵ 13:30 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

²⁶ 1:26:15 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true See also 22:15 5/6/26 Meeting of the Finance, Ways, and Means Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33446?view_id=775&redirect=true

²⁷ 1:36:14. 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

²⁸ 45:40 1/20/2022 Senate Floor Session 39th Legislative Day
tnga.granicus.com/player/clip/25736?view_id=610&redirect=true

²⁹ 1:37:30 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

³⁰ 52:45 1/20/2022 Senate Floor Session 39th Legislative Day
tnga.granicus.com/player/clip/25736?view_id=610&redirect=true

Moreover, not all Republicans agreed with the sentiment that HB7003 should promote partisanship over all other values. Representative Michele Reneau wrote, “In a properly functioning system, representation should follow population—not mid-cycle political strategy.”³¹ Moreover, she wrote, “The stated goal of creating a 9-0 congressional delegation raises a bigger concern. Our responsibility is to represent people first—not parties.”³²

The Role of Race

When presenting the house and senate versions of the congressional map, the bill sponsors went to great lengths to stress that race was not a factor in drawing the maps. For example, Senator Stevens said that the map “removed racial data from the mapping process entirely.”³³ Representative Sexton also said that no racial data were used in the drawing of the map.³⁴ In fact, sponsors of the bill were so determined to prove that race was not a factor in drawing the map, they denied even knowing that Memphis, Shelby County, and the 9th Congressional district were majority-minority, a prospect that the gathered audience found laughable.³⁵ For instance, when asked by Senator Lamar whether he was aware that Memphis was primarily African-American, Senator Stevens said that he was not aware, despite having lived in the city for several years while attending law school.³⁶ Senator Stevens also denied being aware that the 9th congressional district was the only majority African-American district in Tennessee.³⁷ Speaker Sexton also denied knowing the racial demographics the 9th congressional district.³⁸ Representative Lamberth also said that he did not have those demographics when

³¹ “Michele Reneau, State Representative: Special Session : I’d love to hear your thoughts.” 2026. Available online https://www.electmichele.com/post/special-session-i-d-love-to-hear-your-thoughts?fbclid=IwY2xjawRlh1xleHRuA2FlbQIxMABzcnRjBmFwcF9pZBAyMjIwMzIxMzgzMjAwODkyAAEeRKZwzKeO1pAaqjZ_G8pM3pmsXnmvkSFrl7mHXqp2K7q1S-HdX0bI2pcdDs_aem_Ac4CyVtZlT55Ga2DWLWLLw. Accessed 5 June 2026.

³² Ibid.

³³ 2:03:53 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

³⁴ 1:25:15 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

³⁵ 1:50:26 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

³⁶ Ibid.

³⁷ Ibid.

³⁸ 1:25:15 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

asked whether he was aware that Memphis, Shelby County, and the 9th congressional district were predominantly Black.³⁹

It is important to note that at least one lawmaker who was responsible for the maps was aware of the demographics of the 9th congressional district and Shelby County. When asked who drew the proposed map, Senator Stevens responded that he and the Speaker were the sponsors of the map.⁴⁰ When Senator Lamar followed up and asked directly if he drew the lines in the proposed map, Senator Stevens answered, “Yes, we sponsored the map.”⁴¹ Senator Johnson, who sponsored SB7004, which was the companion bill to HB7003, knew that Shelby County and the 9th congressional district were majority African-American. Senator Johnson, when advocating for the passage of HB1034 in 2022, said that the 9th congressional district “is a majority-minority district, has been and it will continue to be.”⁴² He said later that Nashville was only 27% African-American, which was not enough for a majority-minority district unlike Shelby County.⁴³ Also in 2022, Representative Lamberth voted in favor of the previous map minutes after it was described by Representative Marsh as creating nine districts, including one majority-minority district.⁴⁴

Moreover, even though several sponsors said that racial data were not used to draw the districts, the bill sponsors never answered fully or clearly questions regarding the data used to draw the map or who drew the map. In response to several questions about the data used by map drawers, sponsors responded that they used “census data” to draw the map.⁴⁵ However, the census bureau neither collects nor releases partisan data for redistricting, but it does include racial data.

Several Democratic legislators expressed suspicion at the assertion that race was not involved in drawing the map. Lawmakers expressed doubts that the splitting of the Black

³⁹ 09:23 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

⁴⁰ 1:51:40 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

⁴¹ 1:52:11 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

⁴² 57:20 1/20/2022 Senate Floor Session 39th Legislative Day tnga.granicus.com/player/clip/25736?view_id=610&redirect=true

⁴³ 58:40 1/20/2022 Senate Floor Session 39th Legislative Day tnga.granicus.com/player/clip/25736?view_id=610&redirect=true

⁴⁴ 1:18:48 1/24/2022 House Floor Session 40th Legislative Day tnga.granicus.com/player/clip/25790?view_id=610&meta_id=631437&redirect=true

⁴⁵ See 2:08:55 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day tnga.granicus.com/player/clip/33451?view_id=775&redirect=true and 1:38:20 5/6/2026 Meeting of the Congressional Redistricting Committee of Extraordinary Session II. tnga.granicus.com/player/clip/33444?view_id=775&redirect=true

community could have been achieved with such precision across districts by chance. For instance, Senator Yarboro argues that the map treats Black and White Democrats differently, splitting 75% of Black Democrats into two districts that are not geographically compact, while putting 75% of White Democrats into a geographically compact district.⁴⁶ Moreover, this state of affairs meant that White Democrats would be better represented than Black Democrats because White Democrats still would live in the same town as their representative and could get their issues resolved, while the Black community would be “racially and geographically isolated from power.”⁴⁷

It also is worth noting a final thread regarding reflecting the will of Tennessee voters. For instance, Senator Brent Taylor said, “I think it's better for the congressmen in these districts to actually represent the interests and values of Tennesseans . . . [a]nd that's much better accomplished in districts that look like Tennessee rather than just a simply large urban core district like the old district 9 was” (Fowler 2026). Notwithstanding the fact that scholars have long considered words such as “urban” and “inner-city” to be racially coded (Silverman 2016; Hurwitz and Peffley 2005), the people of Memphis and Shelby County also are Tennesseans.

Race and Partisanship in Tennessee

Like many southern states, Tennessee’s electorate was racially polarized prior to the election of President Barack Obama. However, even though Tennessee’s racial realignment began before 2008, it accelerated with the candidacy of Barack Obama (Franklin and Block, Jr. 2020). Already by that year, 94% of voters in the Tennessee Republican primary were White, compared with 2% of Republican primary voters identifying as Black (McKee and Springer 2015: 600). The exodus of White voters has continued such that by 2018, 63% of urban and 67% of rural White Tennesseans identified as Republican, compared with about 50% of White Tennesseans in 1996 (Hood and McKee 2022: 190). Meanwhile, Black Tennesseans have, and continue to, support the Democratic Party overwhelmingly (Franklin and Block, Jr. 2020). As Table 3.2 from Franklin and Block Jr. (2020), reproduced below, shows, the gap in Black-White polarization in Tennessee has grown over time. Research has shown that race is key to understanding this increasing partisan sorting.

Table 1: Black White Vote Differentials in Tennessee. Excerpted from Table 3.2 in Franklin and Block, Jr. 2020.

Black-White Vote Differences (Ecological Inference Analysis)	Mean %	Standard Error
2000	19.1	1.0
2004	28.6	1.4

⁴⁶ 2:22:30 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day
tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

⁴⁷ 2:26:40 5/7/2026 Senate session – 2nd Extraordinary Session 3rd Extraordinary Day
tnga.granicus.com/player/clip/33451?view_id=775&redirect=true

2008	38.9	0.63
2012	46.0	0.62

With respect to alternative explanations for the relationship between race and partisanship, the evidence suggests that abortion attitudes are not as important for vote choice in Tennessee despite its salience in elite rhetoric. The Vanderbilt University poll has found that increasing numbers of Tennessee voters identify as “definitely” or “somewhat” pro-choice, with 56% of registered voters choosing one of those two options in April of 2025 (Vanderbilt University 2025). Only 3% of Tennessee registered voters thought that abortion should be the top priority of the Tennessee state government (Vanderbilt University 2025). Economic anxieties have been important in recent Tennessee elections. However, In Tennessee, only 19% of respondents to the April 2025 Vanderbilt Poll thought that the economy should bet the top priority of the Tennessee state government (Vanderbilt University 2025).

I reserve the right to supplement this report as needed. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2026



Traci R. Burch, Ph.D.

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EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiff,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

EXPERT REPORT OF DR. CHARLES McKINNEY, JR.

Expert Report on the History of Official Voting Discrimination in Tennessee
Charles W. McKinney, Jr.
June 8, 2026

Contents

1. Introduction
2. General Overview
3. CV

Section 1. Introduction

1. My name is Charles W. McKinney, Jr.
2. I am a Professor of History and Africana Studies at Rhodes College in Memphis, Tennessee. I teach course on African American History, the Civil Rights Movement, United States History, African American Politics, 20th Century United States History, Slavery, and Reconstruction in the United States. The history of voter discrimination, voter suppression, the role of race and politics and American life, Southern History, and the struggle for civil and political rights waged by African Americans are frequent topics in a variety of my courses. My CV is included at the end of this document.
3. My Ph.D. is from Duke University. I have lived and worked in Tennessee since 2005.
4. I have been asked by plaintiff's counsel to write a report on the history of voter suppression in Tennessee. This report relies on publicly available sources and literature commonly used in the academic discipline of History.
5. I am paid at a rate of \$250/per hour for the work in this case. My compensation does not affect the conclusions that I reach in this report.
6. The conclusions in this report are provided with a high degree of professional certainty. I reserve the right to further modify, augment, or supplement my report, particularly if additional information becomes available to me.

Section 2.

A History of Voter Suppression in Tennessee

Summary

This report shows how the state of Tennessee has, over the course of the 160 years since Reconstruction, amassed a sustained record of voter suppression and discrimination. During this time, the state has used literacy tests, poll taxes, white primaries, voter identification laws, racial gerrymandering, and other techniques with the clear intent to discriminate against Black Tennesseans. The reactionary dynamism displayed by the state is evident in the continued use of voter restriction laws that, while on their face are race-neutral, have a clear impact on the ability of Black voters to exercise their right to vote in a free and fair manner.

Introduction

In the state of Tennessee, the legacy of voter suppression and disfranchisement has its moorings in the Reconstruction era. In the wake of the Civil War, Tennessee established a pattern that would remain consistent throughout the state's history: tentative gains in the voting rights of African Americans always being followed by muscular efforts to restrict/constrict those rights. While African American Tennesseans have never constituted a majority of the electorate in the state, their presence in major urban centers in the West (Memphis) and Central (Nashville) portions of the state created opportunities for Black citizens to elect Black politicians to a host of local positions on school boards and city councils. These efforts have almost always been met with a *reactionary dynamism* – a state response that delimits Black electoral possibility by employing

both old, tried and tested measures to suppress the vote, or new innovations that, when carried out, have the same effect of contracting Black voter impact.

After Tennessee was reinstated into the Union, African American men were among the earliest population of Black voters in the South to be granted the franchise. They, along with Black women, wasted little time in building lives for themselves and moving a bit closer to the mainstream of American life. Black people across the state engaged in the work of forging lives in the light of freedom: they built vibrant communities, schools, and churches. They created businesses, found family members, created new extended families, and formally sanctioned their unions in marriage. Black folks also actively participated in both the civic and political lives of their cities and connected to Black communities across the South and nation in an effort to bolster their new-found freedoms.

The initial indication of a state-level commitment to Black enfranchisement was short-lived. As Black citizens across the state exercised their new right to vote and worked to expand the meaning of freedom, White political leaders moved to curtail Black rights in an effort to reassert white domination and move the state back toward slavery-era political relationships. The central tool in the process of reactionary dynamism was Black disfranchisement, a legislative maneuver that often powerfully complemented racial violence. In 1866, the Memphis Massacre left dozens of Black citizens dead, and hundreds of homes, churches and businesses burned – a violent reassertion of white supremacy that struck at the heart of Memphis's Black community. The state began passing some of the first laws dedicated to racial segregation in the South in the 1870s. During a state constitutional convention, white political leaders passed a series of laws that successfully diminished Black electoral power across the state. Most of these mechanisms remained in place for decades. With the advent of legal segregation in the 1890s, Tennessee firmly

established a racial operating system that, while not completely harkening back to slavery, certainly moved Black citizens further away from the prospect of full freedom and equality.

General Overview

As Tennessee entered the 20th century, it stood in partnership with every southern state in its dedication to racial domination and political exclusion. The racial animosity expressed in the state found increased sympathy in national political circles. With the election of a segregationist Democratic president in 1912, Jim Crow policies which already ruled the day were solidified in terms of patronage and the appointment of Blacks to low level federal positions in the administration. Legal segregation also emboldened Republican political leadership to more vigorously pursue the purge of Black Republicans from the party in the hopes of creating a “lily white” constituency.¹ The first decades of the century saw Tennessee maintain its racially exclusionary electoral policies. The removal of Black voters from the rolls across the state also facilitated heightened levels of discrimination in educational funding for Black schools across the state. In the 1960s, at the height of the Civil Rights Movement, state legislators worked intentionally to curtail the possibility of Black candidates winning citywide offices by moving cities like Memphis from precinct voting to at-large voting.

¹ Although the Republican Party was the “Party of Lincoln”, and the first political home to African Americans, that affiliation would shift dramatically over time as the Republican Party became less invested in Black equality, and as the Democratic Party began to espouse policies that resonated with the aspirations of Black voters. On party realignment, see Stern, Mark. “Party Alignments and Civil Rights: Then and Now.” *Presidential Studies Quarterly* 25, no. 3 (1995): 413–27. <http://www.jstor.org/rhodes.idm.oclc.org/stable/27551458>; Wright, Gavin, Voting Rights, Deindustrialization, and Republican Ascendancy in the South (September 2020). Institute for New Economic Thinking Working Paper Series No. 135 <https://doi.org/10.36687/inetwp135>, Available at SSRN: <https://ssrn.com/abstract=3731832>; Joshua Farrington, *Black Republicans And the Transformation of the GOP* (Univ. of Pennsylvania Press, 2016); Nancy Weiss, *Farewell to the Party of Lincoln* (Princeton University Press, 1983); Corey Fields, *Black Elephants in the Room: The Unexpected Politics of African American Republicans* (University of California Press, 2016).

The initial years of Tennessee's readmission into the Union encapsulated the perils and possibilities of equality for African Americans. Tennessee's readmission to the Union in 1866 made it the first former confederate state to be reinstated. The State Legislature also ratified the 14th Amendment that same year.² Emboldened by Reconstruction, Black political leaders across the state heightened their efforts to organize Black communities in the anticipation of greater freedom. Powered by state convenings, Black political organizations were well on the way to registering tens of thousands of African American men who lobbied for the franchise in their ongoing effort to make freedom real to formerly enslaved men and women. By 1869, 40,000 Black men had been registered to vote.³

As African Americans pursued their newly gained freedoms, they faced an aggressive and violent reaction in the form of both legislative action and racial violence. In the same year that Tennessee ratified the 14th Amendment and returned to the nation, a massacre occurred in Memphis that left over 40 Black people dead, numerous women raped, and over 100 Black owned homes, churches and businesses burned to the ground. The massacre was a toxic stew that contained a bloody preview of all the elements of repression that Black people would face in the years ahead: lynching, mob violence, Klan-sponsored terrorism, the forcible imposition of racial apartheid, and state-sanctioned violence. The massacre was a violent reaction to the pursuit of political, economic, and social equality in the city and state. The horrendous nature of the violence sent shockwaves throughout the country and spurred Congress to respond with an investigation.⁴

² <https://sharetn.gov.tnsosfiles.com/tsla/exhibits/aale/aahtimelin.htm>

³ Nashville Public Library, "150 Years Later: A 'Brief' History of the Fifteenth Amendment and other Voting Laws", <https://library.nashville.gov/blog/2020/12/150-years-later-brief-history-15th-amendment-and-other-voting-laws>. Accessed 5/31/26; Joseph Cartwright, *The Triumph of Jim Crow: Tennessee Race Relations in the 1880s* (University of Tennessee Press, 1976), 12.

⁴ Stephen V. Ash, *A Massacre in Memphis: The Race Riot That Shook The Nation One Year After the Civil War* (Hill and Wang, 2013); Beverly Bond and Susan O'Donovan, eds., *Remembering the Memphis Massacre: An American Story* (University of Georgia Press, 2020); John Hope Franklin, *Reconstruction After the Civil War* (University of

In 1868, Black political power was still in its infancy. However, by that time, the Klan-fueled campaign of intimidation and terror with the aim of subverting that power was in full bloom. Klan fueled violence across the state and economic intimidation led to a sharp decline in Black political mobilization. The state's most prominent Black political entity, The Union League, saw a significant decline in both activity and influence. After the governor deployed the militia to combat Klan violence across the state in the summer of 1868, the Republican Party's hold on statewide political power became even more tenuous. These were the conditions that set the stage for the state's constitutional convention in 1870.⁵

In 1870, the state ratified a new constitution. As with other moments in this period of the state's history, the revision of the constitution contained both the perils and prospects of potential equality for Black Tennesseans. In the previous year, Republicans lost control of both the governorship and the State Legislature, due in large part to a steady program of Black electoral intimidation. Conservative Democrats (many of whom were former Confederates), back in control of the state, took little time to begin reversing the gains made by Black people and their political allies in the Republican Party. The legislature repealed the state's anti-KKK Act, which made Klan members engaged in terrorist activity subject to arrest, fines, and imprisonment for up to five years.⁶

Prior to the convening, the convention's suffrage committee met to discuss the issue of the Black vote. While most of the members of the committee voted to retain Black voting rights, a vocal minority voted to revoke the franchise for Black Tennesseans. While the new constitution affirmed Black men's right to vote, it also removed statutory restrictions on former Confederates,

Chicago Press, 1994), chapter 9; Armstead L. Robinson, *Plans Dat Comed from God: Institution Building and the Emergence of Black Leadership in Reconstruction Memphis* (New York: Garland Publishing, 1994).

⁵ *Triumph*, 12; Bordewich, *Klan War: Ulysses S. Grant and the Battle to Save Reconstruction* (Knopf, 2023).

⁶ [Ku Klux Klan | Tennessee Encyclopedia](#); *Klan War*, 72-91; Franklin, *Reconstruction*, 158-159.

enabling them to officially resume their quest for political dominance in the state. Moreover, the new constitution implemented a poll tax, a legislative tool designed to suppress the votes of poor (mostly Black) voters in the state.⁷ Even while the status of Black citizens improved incrementally, the legislative animosity shown toward them was a clear indication that the constitutional contradiction woven into the fabric of the state from the first day of its readmission to the Union would only grow fester over time. For the former Confederates who regained control of the state's apparatus in these years, the path to expanded political autonomy and control of the state rested on the dramatic reduction both of the Black vote and Black autonomy.

The forward momentum for full racial equality and justice for Black residents of the state was constantly met with vigorous resistance. One of the central responses to Black advancement crafted by state political leadership was the implementation of racial segregation. Segregation and voter suppression served as two mutually reinforcing mechanisms of domination in the state. The statewide anxieties around racial equality and the open question of what racial operating system would the South adopt lent themselves to the implementation of policies that separated Black folks out of public spaces and accommodations.⁸ In 1870, the same year as the state constitutional convention, the legislature passed an anti-miscegenation law prohibiting marriage between Whites and Blacks, or “descendants of Negro ancestors to the third generation. In 1873, the state segregated public education, a move that caused considerable damage to already underfunded Black public schools across the state.⁹ In 1875, the Legislature passed sweeping legislation, “Chapter 130”, that gave “hotel keepers, carriers of passengers and keepers of places of

⁷ Cartwright, *Triumph*, 15; Franklin, *Reconstruction*, 160; Dewey Grantham, “Tennessee and Twentieth-Century American Politics”, *Tennessee Historical Review*, 54:3, Fall 1995, 210-229.

⁸ Gildrie, Richard P. “Lynch Law and the Great Clarksville Fire of 1878: Social Order in a New South Town.” *Tennessee Historical Quarterly* 42, no. 1 (1983): 58–75. <http://www.jstor.org/stable/42626339>.

⁹ James Anderson, *The Education of Blacks in the South* (University of North Carolina Press, 1988).

amusement” the right to control or deny access as “that of any private person over his private house.”¹⁰

Black Tennesseans, much like their peers in all other Southern states, had to bear the brunt of racial segregation as they sought to build upon their newfound freedom. And, like their peers in other former Confederate states, Black folks reckoned with a hard truth: for the political leadership of their state, vibrant Black political, social and economic life were anathema to the segregationists who controlled the state’s political apparatus.

After the white supremacist takeover of state government, voter intimidation against Black voters ran rampant across the state.¹¹ By the late 1880s, the elimination of “the Negro vote” had become a central political imperative, one that White politicians used to great effect to consolidate white supremacy in the state. The combination of “some force and a great deal of fraud” proved to be a powerful formula for political success for Democrats across the state.¹² In Black Belt counties (including Shelby County) where Black Republicans dominated the voter rolls, Democratic machinery consolidated power at the expense of Republicans and the democratic process.¹³ In the statewide elections of 1886, Fayette and Shelby Counties, both Black Republican strongholds with dominant numerical majorities, Democrats mysteriously outvoted Republicans, scoring massive victories after having lost by large margins two years previously. In Haywood County, the Republican nominee for governor won handily by garnering sixty percent of the vote. Two years later, the Democratic nominee won by a two to one margin. On election night, white men armed

¹⁰ Chapter 130, Acts of Tennessee, House Bill No. 527; Charles McKinney, “The Balcony Project” (An Exploration of Segregation): <https://www.orpheum-memphis.com/plan-a-visit/the-balcony-project>. Accessed 6/2/26.

¹¹ On Memphis, see Paula J. Giddings, *A Sword Among Lions: Ida B. Wells and the Campaign Against Lynching* (Amistad, 2008); On Nashville, see Bobby Lovett, *The African American History of Nashville, Tennessee, 1780-1930* (University of Arkansas Press, 1999) chap. 2.

¹² J. Morgan Kousser, *The Shaping of Southern Politics: Suffrage Restriction and the Establishment of the One-Party South, 1880-1910*, 107.

¹³ “Black Belt” counties typically include Shelby, Fayette, Haywood, and Hardeman.

with rifles stood watch at polling places to “guard” ballot boxes and the places where election officials counted the ballots. Despite the official protests of federal election supervisors and widespread coverage of the political corruption in newspapers across the state, fraudulent elections faced few headwinds. The state’s political infrastructure rested on a foundation of racial exclusion reinforced by state-sanctioned voter fraud.¹⁴

In 1889, the state’s political leadership convened the legislature to pass a series of bills explicitly designed to suppress Black votes during elections. The Myers Act required voters in districts or towns that cast more than five hundred votes in 1888 to register once again twenty days prior to every election. In practical terms, this meant that if a voter wanted to participate in local, state, and federal elections, they would have to re-register four times during election season. Since most Black voters lived in the state’s major cities, the act had a disproportionate impact on their ability to vote. The Lea Law provided for two separate ballot boxes for state and federal elections, an innovation specifically designed to prevent federal supervisors from intervening in the event of voter fraud. The Dortch Law ushered in the usage of the secret ballot. Political parties would no longer print their own ballots. Instead, the state would now print a single ballot. While this was an innovation that, on its face, seemed neutral, it had the effect of making voting *much* harder for illiterate and low-literacy voters. However, another provision of the law stipulated that people who were eligible to vote in 1857 could receive assistance in marking their ballot. Since no Black people could vote in that year, no Black voter had access to this provision. The central purpose of the Dortch Law was to disenfranchise Black Republicans. State officials initially targeted areas of

¹⁴ Richard Couto, *Lifting the Veil: A Political History of Struggles for Emancipation* (Knoxville: University of Tennessee Press, 1993) 41-88; Granberry, Dorothy. “When the Rabbit Foot Was Worked and Republican Votes Became Democratic Votes: Black Disfranchisement in Haywood County, Tennessee.” *Tennessee Historical Quarterly* 63, no. 1 (2004): 34–47; Kousser, *Shaping*, 107-109; Kousser, *Shaping*, 104-123; Franklin, *Reconstruction*, 211-219; Grantham, “Tennessee and Twentieth-Century American Politics”; Lester Laymon, *Blacks in Tennessee, 1791-1970* (University of Tennessee Press, 1977), chap. 3.

the state where most Blacks lived. The poll tax passed by the legislature also achieved its intended effect: it devastated Black voting in Republican precincts across the state. Black voter turnout dropped sixty-eight percent from 1888 to 1892. The Supreme Court's ruling in *Plessy v. Ferguson*, legalizing racial segregation, provided a grim conclusion to a period marked by increasingly successful legislation designed to separate Black people out of the mainstream of American life.¹⁵

The Democratic Party's dominance – along with its racial repercussions – continued unabated well into the twentieth century. Armed with the ability to “win” elections by any ethical or unethical means necessary, Tennessee Democrats weathered political challenges from Republicans during Reconstruction and an insurgent Populist uprising.¹⁶ With White Democratic control entrenched in almost all precincts and districts, and with the passage of muscular voter suppression laws in the 1880s, local, state, and federal elections all felt the weight of voter exclusion. With a contracted electorate and the entrenchment of racial apartheid, white supremacy continued to be a central mechanism for political victory.

As with almost all other former Confederate states, one-party rule in Tennessee streamlined the Democratic Party's capacity to enforce and expand segregation. Although Republicans remained competitive in the eastern portion of the state, the Party was effectively blocked from power in all other sections.¹⁷ Black Tennesseans had little recourse as they were denied equal protection and suffered through the perpetual underfunding of Black public educational

¹⁵ *Plessy v. Ferguson* 163 U.S. 537 (1896); Kousser, *Shaping of Southern Politics*; J. Morgan Kousser, “Post-Reconstruction Suffrage Restrictions in Tennessee: A New Look at the V.O. Key Thesis”, *Political Science Quarterly* 88:4 (December, 1973), 655-683; Carol Anderson, *One Person, No Vote: How Voter Suppression Is Destroying Our Democracy* (Bloomsbury, 2018), chapters 1-2; George C. Stoney, “Suffrage in the South: The Poll Tax”, <https://socialwelfare.library.vcu.edu/issues/suffrage-south-poll-tax/> (6/2/26); Tennessee Encyclopedia, “Disfranchising Laws”, <https://tennesseencyclopedia.net/entries/disfranchising-laws/>. Accessed 6/2/26. On the *Plessy* case, see Lawrence Goldstone, *Inherently Unequal: The Betrayal of Equal Rights by the Supreme Court, 1865-1903* (Walker and Company, 2011), chapters 11-13.

¹⁶ On the Populists, see Lawrence Goodwyn, *The Populist Moment: A Short History of the Agrarian Revolt in America* (Oxford University Press, 1978).

¹⁷ Grantham, “*Tennessee and Twentieth Century Politics*”, 212.

institutions. They had little choice except to identify the best possible methods to navigate a state that grew, with each year, increasingly unequal.¹⁸ One party rule also enabled the state's Democrats to set legislative priorities that heavily favored both established and emerging business centers in the state, such as agricultural interests in West Tennessee and nascent industrial areas in the central part of the state. However, in keeping with the state's racial ethos, Democratic elites continued to dramatically underfund rural infrastructure, social welfare programs, and public education.¹⁹

One party rule carried with it another perilous feature. With general elections no longer genuinely competitive, the focus of Tennessee state governance shifted entirely to internal Democratic primaries. This political vacuum catalyzed the rise of powerful municipal machines, most notably the organization led by Edward Hull "Boss" Crump in Memphis. Elected mayor in 1909, Crump consolidated an immense political apparatus that leveraged patronage, municipal contracts, and systemic control over local polling locations. By the 1920s, the Crump machine operated as a state-level kingmaker. Because Shelby County could reliably deliver a massive, disciplined voting bloc in Democratic gubernatorial and senatorial primaries, Crump effectively dictated statewide policies, judicial appointments, and legislative agendas from his urban stronghold, reducing general elections to a mere formality.²⁰

Crump's political dynasty was a monument to the complex, complicated effects of voter suppression. While Crump worked hard to convey an image as a kindly patrician, his machine readily used all the tools in the arsenal of repression – intimidation, legal maneuvers, and violence – to carry out a democratic agenda. Touting himself as a progressive reformer, Crump modernized

¹⁸ Lester Laymon, *Black Tennesseans*, chap. 1.

¹⁹ On the politics of the One-party South, see V.O. Key, *Southern Politics in State and Nation* (University of Tennessee Press, 2024); C. Vann Woodward, *Origins of the New South* (LSU Press, 1971); Edward Ayers, *The Promise of the New South: Life After Reconstruction* (Oxford University Press, 2007).

²⁰ Wayne Dowdy, *Mayor Crump Don't Like It: Machine Politics in Memphis* (University Press of Mississippi, 2006).

Memphis infrastructure and lobbied for fiscal reform. However, his long tenure as the Boss of Memphis (with statewide influence) rested on his ability to deliver a critical mass of Black votes for the purposes of maintaining political power. The bloc of Black voters that Crump cultivated over the course of his tenure served as a firewall for his power. A centerpiece of that power was the relationship Crump cultivated with elite Black political leaders in the city such as Robert R. Church, Jr. Church, a lifelong Republican, worked to build the electoral power of the GOP in Memphis. He helped create the Lincoln League in 1916, a powerful political organization dedicated to building Black political power in the GOP. Within months of its founding the League registered over ten thousand African Americans in Shelby County.²¹

While Church organized and mobilized Black voters in Shelby County, it was Boss Crump who paid their poll taxes and arranged for transportation on election days – all in the service of voting for Crump’s handpicked machine candidates. The transactional nature of the relationship was stark: for voting for Crump’s candidates, Blacks received a dollop of political patronage, public parks, and other segregated amenities, such as segregated libraries.²² Black leaders were able to garner some concessions from Crump and maintain their leadership positions within the larger community. However, this influence rested atop the knife edge of political allegiance to Boss Crump, an avowed segregationist who at no point in his long tenure believed in the equality of the races. Crump refused to grant Black citizens even the smallest of political positions. As Black folks continued to live, work, and struggle behind the veil of segregation, progress was measured almost solely by the limits of Crump’s political imperatives. The Crump Machine did irreparable harm to the nascent struggles for freedom in Memphis. Any protest or cultivation of activism within the

²¹ Darius Young, *Robert R. Church, Jr., and the African American Political Struggle* (University Press of Florida, 2019), 15-29; David M. Tucker, *Lieutenant Lee of Beale Street* (Vanderbilt University Press, 1971).

²² Knowlton, Steven A. "The “Negro Branch” library in Memphis: A case study of public services in a segregated southern city." *Libraries: Culture, History, and Society* 1, no. 1 (2017): 23-45.

Black community was met with the coercive power of the machine. Crump derived his formidable power from the sustained exclusion of Blacks from a two-party political process.²³

Across the state, voter suppression remained a dynamic tool for the effective undermining of Black political power. In all of the state's major cities, white democrats utilized voter suppression, intimidation, and violence to maintain a firm grip on electoral power. As Black communities across the state began to press for greater freedom, and as the nascent momentum of the civil rights movement increased, white political leaders rarely hesitated to wield all manners of legislative maneuver in order to retain power. Each city witnessed variations on the theme of voter suppression.

In Chattanooga, white leaders used structural exclusion, economic retaliation, and political maneuvers to dilute Black political power. The municipal charter served as the foundation of the city's suppression efforts. The charter, adopted in 1911, created a five-member Board of Commissioners elected through an at-large voting system, one of the chief tools in city leaders' toolkit to dilute the electoral power of Black voters who lived in segregated sections of the city and could vote as a bloc. At-large voting ensured that no Black candidates would be elected to office for the first six decades of the twentieth century. In addition to at-large voting, city leaders implemented a host of local ordinances to suppress voting and civil rights mobilization, such as making it illegal to pay another person's poll tax and banning "ward workers" who assisted elderly or illiterate Black voters in the voting booth. The city also instituted a property scheme that gave voting privileges to non-resident property owners, a move that allowed whites living in the suburbs

²³ Elizabeth Gitter, *River of Hope: Black Politics and the Memphis Freedom Movement, 1865-1954* (University Press of Kentucky, 2014). On the coercive power of the Crump era, see Jason Jordan, "We'll Have No Race Trouble Here": Racial Politics and Memphis's Reign of Terror", in Aram Goudsouzian and Charles McKinney, eds., *An Unseen Light: Black Struggles for Freedom in Memphis, Tennessee*, 130-149; Preston Lauterbach, "Memphis Burning", *Places Journal*, March 2016. <https://placesjournal.org/article/memphis-burning/?cn-reloaded=1>. Accessed 6/7/26.

to (illegally) vote in city elections, thereby inflating white voter power. When Black residents began an aggressive voter registration campaign in the early 1960s, many registrants lost their jobs in the city's industrial sector. Legal intimidation and economic coercion shadowed the movement for freedom in Chattanooga.²⁴

Nashville, often hailed as one of the most progressive cities in the entire South, used gerrymandering, consolidation, and structural adjustments to subvert Black electoral power and blunt the efforts of civil rights activists. Like so many other southern cities, Nashville made aggressive moves in the early 1960s to head off a rapidly expanding (and very organized) Black political class, one anchored by the presence of three Historically Black Colleges, Fisk, Meharry Medical College, and Tennessee A&I (now Tennessee State University). The Nashville Christian Leadership Council, an affiliate of the Southern Christian Leadership Council (SCLC) began a massive voter registration campaign in the late 1950s. Anchored by three Black colleges and one of the most vibrant Black communities in the Upper South, Black Nashville was rapidly approaching a demographic tipping point: the ability to elect local Black leadership and play a role in shaping municipal policy. City and county leaders responded to this possibility by merging the city with the overwhelmingly white, conservative suburban electorate of Davidson County. Overnight, the Black percentage of the new metropolitan entity plummeted, shifting the balance of power firmly back in the direction of the white community. To ensure the maintenance of electoral domination and inoculate the metropolitan government from 14th Amendment federal legal challenges, city leadership instituted a district-based election system for its 40-member Metro

²⁴ Waalkes, Mary, and Donna Summerlin. "Flying Below the Radar: Activist, Paternalist, and Obstructionist Responses to the Civil Rights Movement in Three East Tennessee Communities." *Tennessee Historical Quarterly* 66, no. 3 (2007): 270–93. <http://www.jstor.org.rhodes.idm.oclc.org/stable/42628304>.

Council. While this arrangement provided token Black representation on the Council, it also made it virtually impossible for Black members of the Council to form any type of voting bloc to push for more progressive civil rights policies. The movement for greater freedom in Nashville was shaped – and shadowed – by the city’s ability to manipulate the electoral terrain of the city with the expressed purpose of limiting the democratic possibilities of Nashville’s Black citizens.²⁵

There were numerous instances of voter suppression, intimidation and violence being used to maintain white political dominance across the state. However, one of the most egregious examples of voter suppression and intimidation in the civil rights period occurred in Fayette and Haywood Counties, in the western part of the state. Of the 28,000 people living in Fayette County (the third poorest county in the nation) three quarters of the population was Black. In Haywood County, Black people were just under two thirds of the population. Very few Black residents in either county had been allowed to register and vote; most Black citizens had been barred from voting since the end of Reconstruction. Residents in both counties vividly remembered the lynching of Elbert Williams in 1940 after he attempted to register to vote.²⁶

When Congress passed the Civil Rights Act of 1957, the first civil rights bill passed since 1875, the new law endowed the Justice Department with new powers, one of which was the ability to file civil suit in federal court on behalf of any individual or group whose right to vote had been denied. Emboldened by the new law, local activists John McFerren of Fayette County and C.P. Boyd of Haywood County formed the Fayette County Civic League and the Haywood County Civic and Welfare League, respectively, in 1958 and began a modest voter registration effort with

²⁵ Michael Belknap, *Federal Law and Southern Order: Racial Violence and Constitutional Conflict in the Post-Brown South* (University of Georgia Press, 1995); Benjamin Houston, *The Nashville Way: Racial Etiquette and the Struggle for Social Justice in a Southern City* (University of Georgia Press, 2012); Anthony Siracusa, *Nonviolence Before King: The Politics of Being and the Black Freedom Struggle* (University of North Carolina Press, 2021)

²⁶ Laurie Green, *Battling the Plantation Mentality: Memphis and the Black Freedom Struggle* (Chapel Hill: UNC Press, 2007), 226-227.

an eye toward voting and getting Black citizens included on jury pools. Almost immediately after fourteen residents registered to vote, they were met with threats of economic intimidation. After thirteen of the registered men refused to vote, James Estes, an attorney, filed a complaint with the State Election Commission on their behalf. Estes also helped Black residents see the liberating possibilities of civic engagement when he defended a local Black man accused of murder in a Klan-related incident. Though an all-White jury found the defendant guilty, Estes' powerful presence in the community – and his willingness to stand up to the white power structure – emboldened a large swath of people.²⁷

In 1959, the civic organizations launched an even more aggressive voter registration campaign. In spring of that year, hundreds of Blacks began lining up to register. By May, over 500 Black men and women were registered. After election officials began obstructing the registration process, Estes filed a complaint with the U.S. Civil Rights Commission. In August, Black registrants were barred from casting their ballots in the primary; Democratic Party officials limited voting to “all known white Democrats.” Civic League leaders responded by filing suit against the Democratic Party.²⁸ Before the case was adjudicated, whites in both counties engaged in a host of responses to the brewing insurgency. These responses spanned the range from strategic resignations to a series of brutally repressive measures. First, members of the Election Commission and the Fayette County registrar resigned, hoping their departures would slow voter registration down considerably. After the Attorney General's Office informed both counties that a consent decree had been signed to prevent the exclusion of Black voters, Fayette County limited

²⁷ Wynn, Linda T. “Toward A Perfect Democracy: The Struggle of African Americans in Fayette County, Tennessee, to Fulfill the Unfulfilled Right of the Franchise.” *Tennessee Historical Quarterly* 55, no. 3 (1996): 202–23; Ballantyne, Katherine. “We Might ‘Overcome Someday’: West Tennessee’s Rural Freedom Movement.” *Journal of Contemporary History* 56, no. 1 (2021): 117–41. <https://www-jstor-org.rhodes.idm.oclc.org/stable/27067701>.

²⁸ Wynn, *Ibid*, 213.

registration to one day a week. Whites in both counties created a “Blacklist”, naming Black registrants, activists, and White supporters. Black people who had registered to vote began getting fired. Many people lost not only their jobs, but credit and insurance policies. Some white physicians began refusing to see Black patients. Grocery and drug stores refused to sell food and medicine. Teachers who had registered to vote were fired. White merchants refused to sell goods and services to people on the list. While over 1200 Black voters cast a ballot in the 1960 elections, 400 sharecroppers and tenant farmers were forced off the land. The White Citizens Council and the KKK openly terrorized Black folks in both counties. For many Whites in Fayette County, the sudden and vigorous expansion of Black voters posed a direct threat to white domination. Voting-age Black residents outnumbered whites by almost two to one in the county. As was the case in previous generations, while the concern about “Negro supremacy” lay front and center as an issue, whites often discussed their fear of an “unscrupulous politician” upsetting the “welfare” of the county with notions of racial equality.

To provide housing to the displaced, activists set up surplus army tents on a Black landowner’s land. Tent Cities in both Fayette and Haywood Counties gained national attention. National civil rights organizations gave aid, raised money, and assisted in providing day-to-day needs. The Congress of Racial Equality (CORE) publicized the plight of the Tent City residents nationally. Both sides in the struggle were undeterred. Black evictees remained determined to fight for their rights. White residents continued with economic reprisals and evictions, while contending that the troubles in both counties were the result of educated outside agitators stirring up trouble among happy, complacent Black folks, and that the evictions were due to mechanization. In November of 1960, the Justice Department filed suit against thirty-six landlords.²⁹ In December,

²⁹ *United States v. Atkeison*, W.D. Tenn., No. 4131

the Department added an additional forty-five landowners, twenty-four merchants, and one financial institution to the suit, charging all the parties with civil rights violations. In 1962, a District Court Judge permanently enjoined the landowners from evicting Black residents. By the end of the year, most of the adults in Tent City had registered to vote and the encampments were taken down. The battle over voting rights in Fayette and Haywood Counties was one of the earliest struggles on the very front end of a new freedom movement. The struggle was a powerful reminder both about the indomitable will of determined Black citizens and the collective determination of white society to defend the racial status quo by any means necessary.³⁰

While Black voters in Fayette and Haywood Counties faced virulent intimidation and suppression in their efforts to register and vote, Black voters in Memphis navigated the dynamic forces of suppression and discrimination as they built up a slate of political candidates for the 1959 elections. For decades, Black civic leaders and activists diligently registered Black voters. Robert Church's Lincoln League, a new and vigorous Black Democratic Club, worked alongside a constellation of local civic organizations to register tens of thousands of new voters. By 1959, the community was poised to take aim at a host of elected positions. Benjamin Hooks, Russell Sugarmon, and three other candidates formed the all-Black Volunteer Ticket. Unlike Black political coalitions in other cities, Black residents in Memphis were very wary of White moderates, who expected Black support but could never muster the courage to respond in kind. White politicians feared the implications of aligning themselves too closely with even the most moderate or conservative of Black leaders; the possibility of backlash and retaliation was simply too high.³¹

³⁰ Couto, *Lifting the Veil*, 189-269; Wynn, *Ibid*; Green, *Ibid*; Robert Hamburger, *Our Portion of Hell: Fayette County, Tennessee – An Oral History of the Struggle for Civil Rights* (Jackson: Univ. Press of Mississippi, 2022); Richard Couto, *Ain't Gonna Let Nobody Turn Me Around: The Pursuit of Racial Justice in the Rural South* (Philadelphia: Temple University Press, 1991).

³¹ Sharon Wright, *Race, Power, and Political Emergence in Memphis* (Garland Publishing, 2000), 45; J. Morgan Kousser, *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction* (Univ. of North Carolina Press, 1999), 149-151. As Kousser states, "The racial climate of West Memphis was so torrid during

The Volunteer Ticket reflected the determination by Black leaders that bloc voting and an independent political apparatus were the best way to acquire political power in the city. A “Freedom Rally”, held at the historic Mason Temple Church, drew five thousand Black Memphians, who listened intently while Mahalia Jackson sang and cheered loudly when Martin Luther King, Jr. declared “I am delighted beyond word to see such magnificent unity. The rally was electrifying, and Black Memphians across the city were equally enthusiastic.”³²

By 1959, 55,000 out of the city’s 187,000 registered voters were Black, representing almost a third of the electorate. The city’s white leadership responded to this display of Black political autonomy by bringing the full weight of the state legislature to bear on changing the rules of the game. Of all the Black candidates, whites in power were most worried about Sugarmon, who was running for Public Works Commissioner. When Sugarmon entered the race in June as an independent, he became the seventh candidate for the position. Alarm bells went off immediately. Reporters from both major newspapers ran stories discussing the impending disaster if all the white candidates stayed in the race and split the white vote. For the first time in the twentieth century, the white political establishment in Memphis feared – correctly – that a Black candidate could win a citywide election. At that point in the year, Memphis voters had the option of employing the “single shot” voting method. Instead of selecting your top four preferences voters had the ability to simply vote for one candidate, a “single shot.” This electoral feature meant that, if Black Memphians all voted for Sugarmon, their single shot, while whites voted a host of candidates, he could win. M.A. Hinds, Shelby County Sheriff, ominously intoned at a gathering in the Mississippi Delta, “Negro voters in Memphis may soon be able to elect a Negro as city commissioner through

the late 1950s that any suggestion of softness on segregation, any hint of sympathy for black rights, was considered devastating to a politician.”

³² Laurie Green, *Battling the Plantation Mentality: Memphis and the Black Freedom Struggle* (University of North Carolina Press, 2007), 216-217.

‘single shot’ voting.” As more white Memphians began paying attention to the race, all the candidates – and especially Sugarmon – began receiving death threats.³³

The Shelby County delegation wasted little time in composing a series of bills designed specifically to diminish the possibility of Black electoral victory. In March, the Tennessee State Legislature passed legislation barring the single shot rule. Legislators also changed the structure of the election. Usually, the top candidates who came in first through fourth in the voting won a city commission post on public works, fire and police, finances and institutions, or public service. The Legislature changed the law to require that candidates now had to run for *specific* positions. With the elimination of the single shot rule, and the plurality method, Sugarmon’s chances for victory – along with all the other Black candidates – were severely diminished. Prior to the Legislature changing the law, Mayoral candidate Henry Loeb (the eventual winner of the mayor’s race) asked several of the white candidates to drop out of the race to consolidate the white vote behind fewer candidates. He also asked the City Attorney to study the prospects of creating a run-off election in the event Sugarmon was one of the top vote-getters. When asked if he would publicly endorse any candidate for public works commissioner, Loeb replied “if necessary to prevent the election of a Negro.”³⁴

On election night, none of the Black candidates won their races. In the race for public commissioner, Sugarmon won over 35,000 votes. Had the rules not been changed, he would have become the first Black candidate elected to citywide office since 1879. A local Black radio announcer reflected that the fear of a Black man sitting in a seat of political power brought the white community together like never before “to strike a blow against the attempts of Negroes to

³³ Kousser, *Colorblind Injustice*, 150.

³⁴ Kousser, *Colorblind Injustice*, 155.

rise in Memphis.”³⁵ But, as J. Morgan Kousser reminds us, “[t]he white panic at the prospect of Sugarmon’s election...is the strongest indication of the white racism that pervaded Memphis in the 1950s and 60s and conditioned every public action, particularly every effort to change electoral laws.”³⁶ In the face of possible Black political success, white political leaders in Memphis in 1959 responded in the only way they knew how – by accessing legislative power for the specific purpose of neutralizing Black political power in order to maintain white political supremacy.³⁷

Black communities across the state accelerated their efforts to build political power throughout the twentieth century. The civil rights movement quickened this effort as Black Tennessean began to assert their rights more boldly under the law and demand that those rights be recognized. In response, White political leaders across the state employed suppressive tactics specifically designed to dilute or eliminate the electoral power of Black voters, a key strategy in the escalating fight to maintain the racial hierarchy upon which the state was founded. The State Legislature could always be counted as a reliable ally when it came to the suppression of Black voters. One of the state’s oldest weapons for suppression was legislative malapportionment. Under a statute passed by the Legislature in 1901, districts were shielded from having to reapportion their legislative districts. Even after massive and sweeping demographic shifts and population expansion – all flowing toward the urban centers of the state – legislative lines remained fixed from a moment in time when over 80% citizens in the state resided in rural areas.³⁸ With the continued protection of these boundaries, rural, white districts retained an overwhelming grip on state legislative power. Urban centers such as Memphis, Nashville, and Chattanooga were

³⁵ Bobby L. Lovett, *The Civil Rights Movement in Tennessee* (Univ. Press of Mississippi, 2005), 263.

³⁶ Kousser, *Colorblind Injustice*, 155.

³⁷ Wayne G. Dowdy, *Crusades for Freedom: Memphis and the Political Transformation of the American South* (Univ. Press of Mississippi, 2010), 66-75.

³⁸ “Understanding Population Shifts in Tennessee”, <https://utextensionced.tennessee.edu/understanding-population-shifts-in-tennessee-a-100-year-analysis/> Accessed 6/4/26.

thoroughly underrepresented legislatively. By 1960, one third of the state's population had the electoral power to elect two-thirds of the state's representatives.³⁹

This element of Tennessee law worked as a top tier instrument of voter suppression in the state and had a direct impact on the evolution of urban political power in general and Black political power specifically. Even as Black voter registration surged in cities like Nashville and Memphis, their overall electoral capacity remained stunted due to the legal status quo. This status quo also had the effect of insulating the rural, segregationist voting bloc from any demands emanating from urban, more politically progressive places. Charles Baker, a politician in Shelby County, challenged this ancient tradition by filing suit against the State of Tennessee. In *Baker v. Carr*, Baker claimed that, by deliberately refusing to reapportion legislative seats, the state was violating his rights under the Fourteenth Amendment.⁴⁰ In previous instances, the Supreme Court refused to intervene in redistricting cases, characterizing them as non-justiciable political questions beyond the scope of the Court, under the precedent set by *Colegrove v. Green*, 328 U.S. 549 (1946). However, in the *Baker* case, the Court found, by a 6-2 majority, that constitutional challenges to malapportionment were, in fact, justiciable. This was a crucial decision, one of several cases where the Court asserted that it had the authority to protect citizens against state-sanctioned voter suppression. This case codified the concept of “one person, one vote”, and fundamentally reshaped the electoral terrain in states where malapportionment ran rampant. While this represented a significant victory in the ongoing battle for electoral representation, the political headwinds remained strong in the state.⁴¹

³⁹ Anderson, *One Person, No Vote*, 100.

⁴⁰ *Baker v. Carr*, 369 US 186 (1962); Justia: US Supreme Court Website, <https://supreme.justia.com/cases/federal/us/369/186/>, accessed 6/4/26.

⁴¹ *Colegrove v. Green*, 328 U.S. 549 (1946); Wright, *Race, Power, and Political Emergence in Memphis*; Lovett, *The Civil Rights Movement in Tennessee*; Goudsouzian and McKinney, *An Unseen Light: Black Struggles for Freedom in Memphis, Tennessee*; Green, *Battling the Plantation Mentality*; Marcus Pohlmann and Michael Kirby, *Racial Politics at the Crossroads: Memphis Elects Dr. W.W. Herenton* (Univ. of Tennessee Press, 1996).

The patterns and practices of voter suppression forged in the state's past continued to shape electoral dynamics over the past few decades. The rhetoric of voter suppression also continues to echo down to the current moment. Initiatives passed by the state or county-level officials for the purpose of "clearing", "cleaning" or in some way streamlining voter rolls shares the same language as suppression efforts from the 19th and early 20th centuries. The effort to remove or reduce Black voters is clothed in the language of reasoned moderation.⁴²

In the 1970s, the evolution of the voting rights struggle was marked not by a straight line of progress, but by the dynamic struggle between advocates of racial justice and constituencies determined to keep African Americans secluded to the margins of the electoral process. In the 1950s and 1960s, Fayette and Haywood Counties challenged the white monopoly on local politics and brought Black voters into the democratic process, an effort mightily assisted by provisions in the Civil Rights Act of 1957. In 1970, Congress amended the Voting Rights Act and extended the ban on literacy tests, banning the use of this tool of explicit racial exclusion.⁴³ In *Dunn v. Blumstein* (1972), the Supreme Court ruled that Tennessee's voter residency requirement that a resident had to live in the state for a year and in the county for three months before registering to vote violated the Equal Protection Clause of the 14th Amendment. The ruling compelled Tennessee, and subsequently other states in the nation, to adopt shorter, more reasonable residency laws, and opened the ballot to new residents and high-mobility citizens.⁴⁴

Beginning in the 1970s and 80s, the epicenter of electoral struggles in the state shifted primarily to the local level, where Black communities still grappled with at-large voting systems

⁴² William Chafe, *Civilities and Civil Rights: Greensboro, North Carolina, and the Black Struggle for Freedom* (Oxford University Press, 1980).

⁴³ Steven Lawson, *In Pursuit of Power: Southern Blacks and Electoral Politics, 1965-1982* (Columbia university Press, 1985); "Legacy of the Voting Rights Act: Expansions in the 1970s", Reagan Presidential Library, <https://www.reaganlibrary.gov/legacy-voting-rights-act-expansions-1970s>. Accessed 6/626.

⁴⁴ *Dunn v. Blumstein*, 405 U.S. 330 (1972); "Dunn v. Blumstein." Oyez. Accessed June 6, 2026. <https://www.oyez.org/cases/1971/70-13>.

designed exclusively to dilute Black vote power. Even with rapidly growing numbers of Black registered voters in the state's major cities, at-large elections remained a powerful tool in maintaining white majorities in city and countywide elections. In Chattanooga, a five-member Board of Commissioners dominated city politics. Election to the Board was on an at-large basis. Since white voters voted as a cohesive racial bloc, Black candidates for office had virtually no chance of winning election. In 1911, the city approved a new charter which provided for five City Commissioners elected at-large. In an explicit attempt to limit the ability of Blacks to vote, the charter also made it illegal for groups to form organizations to pay individual's poll taxes. This portion of the act had a deleterious effect on Black voters' ability to financially support other voters by paying their poll tax. These changes in the city charter had their intended effect: no Black person was elected to the City Commission until 1971. Crucially, the city had also expanded dramatically in population in the late 1960s and early 1970s. By 1974, the population of the city reached over 165,000, a feat achieved by annexing surround areas that were primarily occupied by whites. Plaintiffs noted that 96% of the city's new citizens were white.⁴⁵

In 1964, 1970, and 1984, the residents of Chattanooga and Hamilton County failed to pass referenda on whether or not the city and county would be jointly governed under a metropolitan charter.⁴⁶ Having exhausted all of their electoral options to change the racially discriminatory charter, Black activists took to the courts. In November 1987, twelve Black voters filed a suit in federal court, claiming that at-large elections and absentee-owner voting privileges diluted Black political power and violated the Voting Rights Act and the U.S. Constitution. After years of discovery, the lawsuit went to trial in 1989. The judge found that the Commission deliberately

⁴⁵ *Brown v. The Board of Commissioners of the City of Chattanooga*, 722 F. Supp. 380 (E.D. Tenn. 1989); Wade Rollins, Dick Copper, "The Color of Ballots". *Facing South*, December 1, 1989. <https://www.facingsouth.org/1989/12/color-ballots>. Accessed 6/6/26

⁴⁶ *Brown v. The Board of Commissioners of the City of Chattanooga*, 722 F. Supp. 380 (E.D. Tenn. 1989).

sought to disenfranchise Black voters and ordered a new form of government be constructed. As a result of the ruling, Chattanooga was placed under Section 3(c) supervision.⁴⁷

In Memphis, at-large voting and the run-off system (where the top two vote earners ran for office *again*) effectively barred Black candidates from victory. Liberal annexation policies also bolstered the white vote; from 1967 to 1990, the city annexed surrounding unincorporated areas that dramatically increased the white voter base.⁴⁸ The 1982 mayoral elections powerfully illustrate the impact of these policies on Black electoral strength. That year, Mayor Wyeth Chandler resigned to take a judgeship. Per the city charter, J.O. Patterson, the chair of the City Council, was appointed mayor. A prominent Black pastor, and lawyer, Patterson served as interim mayor and ran for election to a full term in 1983. In the general election, Patterson defeated Richard Hackett, garnering 41% of the vote to Hackett's 29%. However, with the run-off system in place, Patterson had to run again against Hackett. Hackett won the runoff election and the racial polarization of the city's electorate virtually guaranteed his victory.⁴⁹

In February 1991, the Justice Department filed suit against the city of Memphis under the Voting Rights Act. The Department claimed that the at-large and runoff schemes employed by the city diluted the Black vote in Memphis and precluded the election of Blacks to most of the city's elected positions. Specifically, the suit claimed that Memphis's white majority voted as a bloc to consistently defeat Black candidates, and declared that the combination of the electoral system and

⁴⁷ Rollins, Copper, "The Color of Ballots". <https://www.facingsouth.org/1989/12/color-ballots>. Accessed 6/6/26; Travis Crum, "The Voting Right's Act Secret Weapon: Pocket Trigger Litigation and Dynamic Preclearance", *The Yale Law Journal*, 119: 1992, 1992-2010.

⁴⁸ Annexation Ordinance History. Shelby County: <https://www.shelbycountyttn.gov/DocumentCenter/View/21645/Annexation-Ordinances-history?bidId>. Accessed 6/6/26; Pohlmann and Kirby, *Racial Politics at the Crossroads*, 113.

⁴⁹ Wright, *Race, Power, and Political Emergence in Memphis*, 104.

annexation ensured the success of these devices by constant expansion of the white electorate.⁵⁰ In that year's mayoral election, Willie Herenton, the African American Superintendent of Memphis City Schools, entered the race against the incumbent Richard Hackett. The conventional wisdom was that, due to the current election rules, Hackett would ultimately win the election, even if it went to runoff. However, to the surprise of many, federal district judge Jerome Turner issued a preliminary injunction against runoffs, effectively removing that option from the mayor's election in October. In October of 1991, Willie Herenton became Memphis's first elected Black mayor, winning by 172 votes out of over 245,000 votes cast. Herenton's narrow victory was only possible because a district court judge affirmed the principles set forth in the Voting Rights Act.⁵¹

Around the nation, redistricting efforts in the wake of the 1990 Census resulted in one of the largest increases in minority representation since the passage of the Voting Rights Act. As in years past, the growing presence of minorities and the concomitant expansion of non-white political influence rekindled a contentious struggle for power in state legislatures, particularly in the South. The debates swirling around the nation about minority voter representation tended to obscure the fact that Black people remained severely underrepresented in both Congress and in legislatures around the nation. Despite being 11.1% of the overall voting age population, African Americans still only comprised 4.9% of members of Congress and 5.4% of state legislators.⁵²

⁵⁰ Pohlmann and Kirby, *Racial Politics at the Crossroads*, 114; *United States v. City of Memphis*, Case No. 2:91-cv-02139 (W.D. Tenn.); Otis Sanford, *From Boss Crump to King Willie: How Race Changed Memphis Politics* (Univ. of Tennessee Press, 2017), 203-242.

⁵¹ Christophe Silver and John Moeser, *The Separate City: Black Communities in the Urban South, 1940-1968* (Univ. Press of Kentucky), 173.

⁵² Frank R. Parker, *The Constitutionality of Racial Redistricting: A Critique of Shaw v. Reno*, 3 U.D.C. L. REV. 1 (1995).

Available at: <https://digitalcommons.law.udc.edu/udclr/vol3/iss1/4>; Brenda Wright, "Minority Vote Dilution is Still Illegal", *Southern Changes: The Journal of the Southern Regional Council, 1978-2003*, Vol. 22, No. 4, 2000 pp. 7-10.

In 1992, the Tennessee General Assembly passed legislation reapportioning both houses of its legislative body. Voting rights activists in rural West Tennessee filed suit. *Rural West Tennessee African American Affairs Council v. Sundquist* alleged that the new apportionment plan violated Section Two of the Voting Rights Act and the 13th, 14th, and 15th Amendments to the Constitution. African Americans living in Rural West Tennessee were quite familiar with voter discrimination.⁵³ They had been fighting for full electoral inclusion since the dawn of Reconstruction, through the era of segregation, and the civil rights movement.⁵⁴ In September 1993, a three-judge panel ruled the House Plan unconstitutional because it violated the “One Person, One Vote” doctrine set forth by *Baker v. Carr*. Two months later, the court ruled that the Senate Plan violated Section 2 of the Voting Rights Act by “affording African American voters in west Tennessee less opportunity than other members of the electorate to participate in the political process and the elect representatives of their choice.”⁵⁵

In hopes of making a judicial course correction, the General Assembly adopted a new House plan during the appeal in 1994. Chapter 536 of the Public Acts of 1994 created a three-part reapportionment plan for the state’s 99 house districts. After the Court dismissed the plaintiff’s case, the Council amended its complaint and challenged the House Plan on the sole ground of violating Section 2 of the Voting Rights Act. In 1998, the District Court ruled that the 1994 House Plan violated the Voting Rights Act. Plaintiffs in the case pointed to the question of proportionality. In the six counties counted in the case, African Americans comprised 31% of the voting age population but noted that none of the districts in the area contained a majority of Black voters. The court went on to acknowledge that, “in four of the five districts minority members make up 25-

⁵³ The counties implicated in the plan were: Madison, Haywood, Hardeman, Tipton, Fayette, and Lauderdale.

⁵⁴ New York Times. “How Minority Districts Fueled the G.O.P.’s Southern Ascendancy in Congress,” May 10, 2026.

⁵⁵ *Rural West Tennessee African American Affairs Council v. Sundquist*, 209 F.3d 835, 837 (6th Cir. 2000), citing *Rural West Tennessee African American Affairs Council v. McWhorter*, 836 F.Supp. 453, 456 (W.D. Tenn. 1993).

55% of the population and hence could meaningfully affect election outcomes in those four districts, but concluded that in the absence of a single majority black district, this fact had little probative significance.”⁵⁶ In April of 2000, the state appealed to the Supreme Court, requesting a stay. Justice John Paul Stevens rejected the request.⁵⁷

The ruling in this case reaffirmed the necessity for a watchful judiciary. It also confirmed the continued history of voter suppression in West Tennessee.⁵⁸ The discriminatory conditions observed by the court in the early 1990s were the product of law and history. The systematic dilution of Black voter power had been woven into the state’s DNA. Anchored by the constitutional avoidance sanctified by the Legislature in 1901, Tennessee continued – with dogged determination – to bake voter suppression into its reapportionment process. However, as in years past, Black activists and their allies looked to the courts for remedy. The ruling also helped further focus arguments regarding racial bloc voting. The court maintained that “that neither over-proportionality in one area of the State nor substantial proportionality in the State as a whole should ordinarily be used to offset a problem of vote dilution in one discrete area of the state.” The message was clear from the U.S. Court of Appeals for the Sixth Circuit: the presence of majority-minority districts in urban centers did not absolve the state of its obligation to uphold equal representation in another part of the state. In *Cousin v. McWherter* the court made a similar finding, acknowledging a history of voter discrimination in Hamilton County.⁵⁹

Since then, Tennessee has implemented a host of laws that placed an undue burden on minority voters. In 2011, the state passed a law requiring presentation of a photo ID to vote. While

⁵⁶ *Rural West Tennessee African American Affairs Council v. Sundquist*, 209 F.3d 835, 842 (6th Cir. 2000).

⁵⁷ *Sundquist v. Rural West Tennessee African American Affairs Council*, 531 U.S. 944 (2000); The Las Vegas Sentinel-Voice. “Justice lets Black Tennessee district stand.” April 13, 2000.

⁵⁸ *Rural West Tenn. African-American Affairs Council v. Sundquist*, 209 F.3d 835, 843 n. 1 (6th Cir. 2000).

⁵⁹ *Rural West Tennessee African American Affairs Council v. Sundquist*, 209 F.3d 835 (6th Cir. 2000); Kristen Clarke, “Voting Rights & City-County Consolidations,” 43 *Houston Law Review* 621; *Cousin v. McWherter*, 46 F.3d 568, 571 n.3 (6th Cir. 1995).

the Secretary of State for Tennessee claimed that the law was implemented to ensure the accuracy of the voter rolls, critics expressed other, larger concerns, such as an over-reliance on outdated databases to make crucial decision regarding a voter's eligibility and the higher probability of highly mobile voters (who are disproportionately poor) being accidentally dropped from the rolls. The American Civil Liberties Union observed that, under the new law, hundreds of thousands of voters had been purged from the rolls for inactivity, "a practice the Sixth Circuit Court of Appeals has ruled violates the National Voter Registration Act."⁶⁰ When the state passed the act, voting rights advocates pointed out that the state had hundreds of thousands of voters without the necessary ID to vote under the new law, and that number included 230,000 senior citizens, many of whom possessed state-issued driver's licenses without photographs. Activists also pointed out that, as of July 2012, the state's "intense campaign" to educate voters and provide free, state-issued IDs had resulted in just under 21,000 free IDs for election purposes.⁶¹

City officials in Memphis responded proactively to the issue of disenfranchisement caused by the state's voter ID law by instructing the Memphis Public Library to begin issuing library cards with photos. The initiative came under attack on the day of its announcement. State officials argued that, since the library was a city entity and not a state entity, it did not have the authority to issue IDs that could be used for election identification. Memphis Mayor A.C. Wharton argued that the city library system should count as a state institution under the Voter ID law. According to Wharton, "the library system is the very embodiment of a state institution."⁶² The State Elections

⁶⁰ "ACLU-TN Voting Rights Toolkit". https://www.aclu-tn.org/app/uploads/2023/09/tn-voting-rights-toolkit-final.pdf?utm_source=chatgpt.com. Accessed 6/6/26.

⁶¹ Chris Kromm, "Tennessee reveals shortfalls in efforts to remove barriers created by voter ID laws", *Facing South*, 3/15/13. <https://www.facingsouth.org/2013/03/tennessee-reveals-shortfalls-in-efforts-to-remove-.html>. Accessed 6/6/26. Chris Kromm, "Tennessee program to provide photo IDs missing most voters who need it", *Facing South*, 7/12/12. <https://www.facingsouth.org/2012/07/tennessee-program-to-provide-photo-ids-missing-most-voters-who-need-it.html>. Accessed 6/6/26.

⁶² Bob Warburton, "Judge: Memphis Library Cards Aren't Voter ID", *Library Journal*, 8/6/12. <https://www.libraryjournal.com/story/judge-memphis-library-cards-arent-voter-id>. Accessed 6/7/26.

Coordinator ordered voting officials in Shelby County not to accept Memphis library cards as a valid form of identification. Wharton responded to the Elections Coordinator with a 33-page legal opinion from the city attorney that had been written earlier in the year in preparation for litigation. Wharton and other voter advocates had long claimed that the state's voter ID law placed an undue burden on elderly, Black citizens. Wharton issued a public call to anyone who had experienced difficulties trying to vote, encouraging them to come forward and explore legal recourse. One elderly woman came forward and identified herself as a plaintiff. Her library ID was her only form of identification. She tried, unsuccessfully, to vote at two separate voting precincts and had been turned away, in clear violation of the law. The city's response to the voter ID law was innovative, proactive, and gained the support of the Tennessee ACLU, the Shelby County Democratic Party, and the Memphis Branch of the NAACP. The residents and the city filed a declaratory judgment action arguing that the photographic identification requirement violated constitutional protections, and that the "city qualified as an entity of the State authorized to issue valid photographic identification cards through its public library." While the court upheld the Voter ID law, it also declared that the cards issued by the library complied with the statute. After the ruling, the State Legislature changed the law to specifically exclude identification issued by municipalities or their libraries from qualifying as valid forms of ID for elections.⁶³

In recent years, the state has continued its assault on the full, constitutional expression of voting rights. Rather than finding ways to increase participation and turnout, Tennessee continually failed to pass a provision in the Voter ID law that enabled out of state students to use their college

⁶³ *City of Memphis v. Hargett*," "Judge: Memphis Library Cards Aren't Voter ID", <https://www.libraryjournal.com/story/judge-memphis-library-cards-arent-voter-id>. Accessed 6/7/26; "ACLU-TN Disappointed with Stat Appeals Court Ruling Upholding Photo ID Law", <https://www.aclu.org/press-releases/aclu-tn-disappointed-state-appeals-court-ruling-upholding-photo-id-law>. Accessed 6/7/26; "Memphis Sues Tennessee Over Voter ID Law", <https://www.courthousenews.com/memphis-sues-tennesseecover-voter-id-law/>. Accessed 6/7/26.

identification to vote. Students in Nashville took the state to court to gain access to a right that had been affirmed in previous cases. While the state barred students from using their student IDs to vote, state law allows for concealed-carry permits to count as a valid ID. According to the Brennan Center, “this legislative choice disproportionately harms African Americans, who are under-represented among concealed-carry handgun permit holders and over-represented among students. For instance, African Americans make up 16.9% of the public university student population, but received less than 7.7% of the state’s concealed-carry permits last year.”⁶⁴

In 2019, lawmakers passed a bill essentially criminalizing voter registration organizations in the state, creating another set of obstacles to vote in a state with abysmally low voting rates. Ironically, the bill became law in response to a significant increase in voter registrations before the 2018 midterm elections. In 2018, the Tennessee Black Voter Project led a coalition of organizations in accumulating 91,000 applications.⁶⁵ In an act of legal intimidation, the new law created civil and criminal penalties to suppress the success of major voter registration groups. The submission of an incomplete application carried the potential for legal action. To make matters worse, the bill was unclear on who, precisely, would be subject to punishment for the submission of incomplete, or “deficient” forms. While the bill mandated state sponsored training for voter registration groups, it did not lay out any details about the provision of the mandatory training. Voter registration

⁶⁴ *Nashville Student Organizing Committee et al. v. Hargett et al.*, 123 F. Supp.3d 967 (M.D. Tenn. 2015); “Students Claim Tenn. Voter ID Law Is Unfair.” Courthouse News Service, March 5, 2015, [Students Claim Tenn. Voter ID Law Is Unfair | Courthouse News Service](#); Lawrence Norden, Statement from Congressional Forum: “Excluded from Democracy: The Impact of Recent State Voting Changes.” <https://www.brennancenter.org/our-work/research-reports/statement-congressional-forum-excluded-democracy>. Accessed 6/6/26.

⁶⁵ Matt Vasilogambros, “Tennessee Made It Harder to Register Voters. Activists Consider What’s Next”. *Stateline*. <https://stateline.org/2019/08/14/tennessee-made-it-harder-to-register-voters-activists-consider-whats-next/>. Accessed 6/6/26.

groups took the state to court, and in 2020 the state repealed the more deleterious components of the bill.⁶⁶

The Civil Rights Movement ushered in an unprecedented era of voting rights expansion for African Americans. However, on the heels of that expansion, states like Tennessee began disenfranchising convicted felons at a growing rate.⁶⁷ By 2016, 6.1 million people in the nation were disenfranchised due to a felony conviction. Tennessee led the nation in the rate which it purged convicted citizens from the voter rolls. In 2022, the state excluded over 470,000 Tennessee voting age residents, a number that represented 9.3% of the state's voting age population. Of that dismal number, over 68,000 citizens were on probation or parole, and over 370,000 had completed their sentences. Between 2018 and 2023, only 3,350 people with felony convictions had successfully restored their rights, a paltry 1% of people who had completed their sentence.⁶⁸ Over one in five Black voting age residents were unable to vote due to their criminal records. Tennessee law facilitated a rate of disenfranchisement for Black people that was four times the national average. Although Black Tennesseans only make up 17% of the state's population, they are 43% of those disenfranchised. The historic and discriminatory overrepresentation of Black people in the

⁶⁶ "Tennessee Removes Anti-Voter Registration Provisions Following Federal Legal Challenge", ACLU, April 2, 2020, [Tennessee Removes Anti-Voter Registration Provisions Following Federal Legal Challenge | American Civil Liberties Union](#); "Civil and Voting Rights Organizations Oppose Tennessee's Proposed Restrictions to Voter Registration Drives". Lawyers' Committee for Civil Rights Under Law. April 15, 2019, [Civil and Voting Rights Organizations Oppose Tennessee's Proposed Restrictions to Voter Registration Drives | Lawyers' Committee for Civil Rights Under Law](#)

⁶⁷ Michelle Alexander, *The New Jim Crow: Mass Incarceration in the Age of Colorblindness* (The New Press, 2020).

⁶⁸ Dinesh Napal, Kristen Budd, Emma Stammen, "Tennessee Should Restore Voting Rights to Nearly 400,00 Citizens", The Sentencing Project. 3/31/25. <https://www.sentencingproject.org/fact-sheet/tennessee-should-restore-voting-rights-to-nearly-400000-citizens/>. Accessed 6/7/26; Hannah, Grabenstein, "Tennessee makes it hard for ex-offenders to regain voting rights. This man did it anyway." MLK50: Justice Through Journalism. 10/30/20. <https://mlk50.com/2020/10/30/ex-offender-fights-tennessees-tough-path-to-restore-voting-rights-before-election-day/>. Accessed 6/7/26.

criminal justice system lays the foundation for overrepresentation in voter disenfranchisement in the state and in the nation.⁶⁹

The state's effort to restore the voting rights of citizens who have completed their sentences are inadequate and have a disproportionate impact on Black citizens. While other states have made it easier for system-impacted residents to vote, Tennessee has made it more difficult—so difficult that activists working on the issue liken the restoration process to voter suppression. Court fines and fees, coupled with little to no assistance from state officials tasked with helping people fill out the appropriate forms, all combine to keep eligible voters off the rolls.⁷⁰ In 2020, the Tennessee NAACP filed suit against the state, claiming that state officials failed to adequately administer the process whereby citizens can get their mandatory Certificates of Restoration (COR) completed and have their right to vote reinstated. Plaintiffs in the suit challenged the state's "unequal, inaccessible, opaque, and error-ridden implementation of the statutes granting restoration of voting rights to citizens who lost the right to vote because of a felony conviction." Plaintiffs also noted that Rutherford County charged a \$25 fee to issue a COR in order to register to vote. The suit claimed that this charge amounted to an illegal poll tax. In addition to the poll tax Rutherford County had instated, the suit also claimed that the voter restoration process violated the Due Process Clause of the 14th Amendment, the Equal Protection Clause of the 14th Amendment, and the National Voter

⁶⁹ The Sentencing Project, "Tennessee Denies Voting Rights to Over 470,000 Citizens", <https://www.sentencingproject.org/app/uploads/2023/01/Tennessee-Voting-Rights-for-People-with-Felony-Convictions.pdf>. Accessed 6/7/26; Bianca Fortis, "How Tennessee disenfranchised 21% of its Black Citizens." *MLK50: Justice Through Journalism*. <https://mlk50.com/2022/11/08/how-tennessee-disenfranchised-21-of-its-black-citizens/>. Accessed 6/7/26.

⁷⁰ Nicole Lewis, "Tennessee's Voter Restoration Gauntlet", *The Marshall Project*. 9/19/19. <https://www.themarshallproject.org/2019/09/19/tennessee-s-voter-restoration-gauntlet>. Accessed 6/7/26; Jamie McGee, "Restoring voting rights after a felony is rare in Tennessee. This year, the process got harder." *Tennessee Lookout*, 12/7/23. <https://tennesseelookout.com/2023/12/07/restoring-voting-rights-after-a-felony-is-rare-in-tennessee-this-year-the-process-got-harder/>. Accessed 6/7/26.

Registration Act. Sadly, while the leading the nation in disfranchising its system involved citizens, state officials dramatically underperform when it comes to voter restoration.⁷¹

In 2025, voting rights activists in Fayette County once again took to the courts to press for greater freedom. The Legal Defense Fund filed suit against Fayette County Commissioners for adopting a map that diluted Black electoral power.⁷² Ignoring the “explicit advice” of its own redistricting committee and legal counsel, the commission adopted a plan with no majority-minority districts. Under the new map, Black voters – who comprised more than a quarter of Fayette County’s population – had no representation on the nineteen-member county commission. Black activists also alleged that the 2021 map was based on a previous redistricting cycle that also diminished Black electoral power.⁷³ The Department of Justice also filed suit, claiming that Fayette County violated the Voting Rights Act.⁷⁴ Both suits referenced Fayette County’s long history of voter exclusion and discrimination. In response to the two lawsuits, Fayette County commissioners unanimously passed a new electoral map in 2025 that contained three majority-minority single member districts.⁷⁵

Conclusion

⁷¹ Case Summary of *NAACP v. Lee*, Civil Rights Litig. Clearinghouse, <https://clearinghouse.net/case/18230/> (last updated 1/3/2025). Accessed 6/7/26; A year after the suit was filed, Rutherford County removed the fee from the restoration process. Campaign Legal Center, “Rutherford County, TN Will End \$25 Poll Tax”, <https://campaignlegal.org/press-releases/rutherford-county-tn-will-end-25-poll-tax>. Accessed 6/7/26. This case is still ongoing.

⁷² *NAACP Fayette-Somerville Branch v. Fayette Cnty., Tenn.*, No. 2:25-cv-02223 (W.D. Tenn. 2025).

⁷³ Cassandra Stephenson, “Lawsuit: Fayette County diluted Black voting power, violated Voting Rights Act in 2021.” *Tennessee Lookout*. 1/16/25. <https://tennesseelookout.com/2025/01/16/lawsuit-fayette-co-diluted-black-voting-power-violated-voting-rights-act-in-2021-redistricting/>. Accessed 6/7/26.

⁷⁴ *U.S. v. Fayette Cnty., Tenn.*, No. 2:25-cv-02047 (W.D. Tenn. 2025).

⁷⁵ LDF Press Statement, “LDF declares victory in successfully advocating for the County Commission in Fayette County, Tennessee to draw a New, Fairer Electoral Map.” 6/4/26. <https://www.naacpldf.org/press-release/ldf-declares-victory-in-successfully-advocating-for-the-county-commission-in-fayette-county-tennessee-to-draw-a-new-fairer-electoral-map/>. Accessed 6/7/26.

Racially motivated voter suppression has been and continues to be a regrettable fact of life for African Americans in the Volunteer State. From the first days of Reconstruction down to the day after the Supreme Court's ruling in the *Callais* case, voter suppression has played a central role in the state's political evolution. The litany of devices deployed by the state is clear: poll taxes, literacy tests, white primaries, to say nothing of violence, intimidation, and murder. All of these have been brought to bear on the uncertain odyssey toward racial justice that has played out in the state. In each of these instances, African Americans have been the primary targets of this suppression.

As African Americans gained more political power, particularly in the western portion of the state, White leaders had to rely less on segregation era intimidation tactics to stop the forward march of Black progress. Instead, they amplified and modernized an old tactic, legislative manipulation. When Russell Sugarmon and other members of the Volunteer Ticket came close to winning citywide political positions, the Shelby County delegation and state legislature changed the election rules, ensuring no Black candidate could win. When Black citizens in Nashville approached a plurality in some districts, White leaders merged the county and city, a move designed specifically to blunt Black political power. Voter ID laws continue to stifle voter registration, particularly in poor, Black, and immigrant communities. In 2026, White leaders are working to remove Black representation from the state's congressional delegation by breaking up the overwhelmingly Black 9th Congressional District. All told, the patterns and practices of suppression, forged in the state's past, reverberate to the present.

Note

Pursuant to 28 U.S.C. § 1746, I, Charles W. McKinney, Jr., declare under penalty of perjury that the foregoing is true and correct.

Date: June 8, 2026

A handwritten signature in cursive script, appearing to read "Chas W McKinney".

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Education

Duke University

Ph.D., United States History, 2003

Dissertation: “‘Our people began to press for greater freedom’: The Black Freedom Struggle in Wilson, North Carolina, 1945-1970”

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Graduate Certificate, African and African American Studies, 2003

A.M., United States History, 1993

Master’s Thesis: “Fighting the ‘Violence’ of Poverty: The Creation of the Foundation for Community Development”

Morehouse College

B.A., cum laude with Honors in History and English, 1989

Academic Appointments

Rhodes College, Department of History

Professor, 2025 – Present

Associate Professor, 2011 – 2025

Assistant Professor, 2005 – 2011

Neville Frierson Bryan Chair, Africana Studies, 2014 – 2023

Director, Rhodes Institute for Regional Studies, 2012 – Present

Courses Taught

Rhodes College

History

African American History

American History/American Music

The African American Intellectual Tradition

Behind the Veil: African American Life in the Jim Crow South

Black Women’s Activism

Civil Rights in Memphis

The Civil Rights Movement
History, Literature and the African American Experience
Martin Luther King, Jr. in Historical Context
The Meaning of Freedom: African American Activism, 1830-1950
Recent History of the United States (Post – 1945)
Slavery in the United States
Teaching the Civil Rights Movement
U.S. History in the 20th Century

Africana Studies

Africana Theory
Theory and Methods in Africana Studies
The Black Freedom Struggle
Introduction to Africana Studies
Black Madness/Mad Blackness: The Psychic Life of Race
Theory and Methods in Africana Studies

Duke University

Introduction to African American Studies

African American History, 1619-Present
The African American Presence in American Film

Guilford College

Civil Rights in North Carolina: A History

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“Teaching the Movement’s Most Iconic Figure”, Teaching Hard History Podcast, November 2020: <https://www.learningforjustice.org/podcasts/teaching-hard-history/civil-rights-movement/teaching-the-movements-most-iconic-figure>

“George Floyd and the Black Lives Matter Protests”, Good Morning Scotland/BBC Interview, June 2020

“George Floyd’s Death and its Aftermath”, China Central Television, Interview, June 2020

Panelist, “Building Opportunity For All”, Discussion hosted by *Atlantic Monthly Magazine*, National Civil Rights Museum, April 2019: <https://www.youtube.com/watch?v=e1jYT-JbyVs>

“Don’t Know Much About History: Is it time to change Public School Curriculums?”, *Where We Live*, WNPR, March 2019: <https://www.wnpr.org/post/dont-know-much-about-history-it-time-change-public-school-curriculums>

Interview for *An Unseen Light*, New Books in African American History Podcast, December 2018: <https://www.stitcher.com/podcast/new-books-network/new-books-in-african-american-studies/e/57542362>

“*An Unseen Light: On the History of Black Memphis*”, *Black Perspectives*, October 2018: <https://www.aaihs.org/an-unseen-light-on-the-history-of-black-memphis/>

“Martin Luther King’s Legacy: Fifty Years Later”, *The Takeaway*, WNYC Studios, April 2018: <https://www.wnycstudios.org/story/the-takeaway-2018-04-04/>

“Martin Luther King and the Grassroots Struggle in Memphis,” *Black Perspectives*, April 2018: <https://www.aaihs.org/martin-luther-king-jr-and-the-grassroots-struggle-in-memphis/>

“MLK’s Final Message, Fifty Years after His Death”, *On Point*, WBUR Studios, April 2018: <http://www.wbur.org/onpoint/2018/04/04/martin-luther-king-assassination-50-years>

The Permanent Record Podcast, Just City, April 2018: <http://www.theoamnetwork.com/tpod/2018/4/16/episode-23-dr-charles-mckinney>

Public Radio East, Interview Regarding *Greater Freedom*, 2011:

<http://www.publicbroadcasting.net/pre/news.newsmain/article/0/0/1745715/Arts..and..Culture/Greater.Freedom.The.Evolution.of.the.Civil.Rights.Struggle.in.Wilson..North.Carolina.-.Charles.W..McKinney..Jr>

New Books in History Website, Interview Regarding *Greater Freedom*, 2011:

<http://newbooksinhistory.com/2011/09/16/charles-mckinney-jr-greater-freedom-the-evolution-of-the-civil-rights-struggle-in-wilson-north-carolina-upa-2010/>

Selected Television Interviews/Lectures

George Floyd protests prompt question: “What should we be doing to transform neighborhoods and communities?” ABC News 24 Interview, June 2020:

<https://www.localmemphis.com/article/news/local/protests/george-floyd-protests-prompt-question-what-should-we-be-doing-to-transform-the-neighborhoods-and-the-communities/522-9729acf0-fbf3-43ce-9869-f20cbfcb541e>

‘This is what people do when they have not been heard’: A local professor weighs in on the cause of riots.” Fox 13 Memphis News Interview, May 2020:

<https://www.fox13memphis.com/news/local/what-causes-riots/EA4MDEP3WFHFBNIEQPLUZICG7I/>

CNN Interview, “Donald Trump and John Lewis”, January 2017:

https://www.youtube.com/watch?v=d22_ZfLf0V8

Featured on “Lectures in History,” American History TV, CSPAN-3, November 2016: <https://www.c-span.org/video/?417459-2/world-war-ii-civil-rights>

CNN Interview, “Same-Sex Marriage Laws”, November 2012:

<https://www.youtube.com/watch?v=CiB7WwfGIpU>

Work in Progress

The Political Worlds of George Washington Lee

Martin Luther King, Jr., and the Black Liberal Arts Tradition (Symposium and Edited Volume of the Proceedings, to be published in the Morehouse College King Collection Series on Civil and Human Rights, University of Georgia Press, 2027)

Selected Invited Talks

“A Rising Imbalance: Civil Rights and the Demise of Black Republicanism in the 1960s”, University of Buffalo, February 2025

“Building Black Wealth”, Catalyst for Change Distinguished Speaker Series, National Civil Rights Museum, April 2023

“Black Women’s Local, National, and International Organizing and Activism”, Association of Black Women Historians National Conference, December 2022

“Black Studies: Origins and Obligations”, The Patience Essah Lecture in Africana Studies, Auburn University, October 2022

“Confronting the Master Narrative of the Civil Rights Movement”, Gilder Lehrman Institute Presentation, July 2022
“Unfulfilled Dreams and Other Tragedies: Reckoning with the Unfinished Work of the Civil Rights Movement”, Missouri State University, February 2022

“The Beautiful Struggle: What King can teach us about the ‘fierce urgency of now.’” King Day Lecture, University of Texas – San Antonio, January 2022

“Killing King Again: Race, Power, and the Cost of Unfulfilled Dreams”, King Day Lecture, University of Florida, January 2022

“The Political Worlds of George Washington Lee: Power, Politics, and the End of Segregation,” Anna J. Cooper Workshop in Black History, University of Maryland, February 2021

“Race, History, and Democracy: A Discussion”, Conversation with Aram Goudsouzian, University of Memphis Advocate for Democracy Series, February 2021

“The Legacy of Martin Luther King, Jr.” Panel Discussion, Hosted by the United States Embassy, Qatar, February 2021

“Martin Tried To Tell Us: Confronting King as the Nation Chooses Chaos Over Community”, Duquesne University, January 2021

“The King We Don’t Know”, Arizona State University, January 2021

“A Rising Imbalance: George Washington Lee, Civil Rights Ascendancy and the Demise of Black Republicanism in Memphis, Tennessee”, Remaking Political History Conference, Purdue University, June 2019

“An Imperfect Union: Pursuing the Constitution in an Age of Alienation”, Constitution Day Lecture, Delta State University, September 2018

“The Dangerous Nature of Education”, Rhodes College Opening Convocation (Speech given by the winner of the Clarence Day Award for Teaching) August 2018

“Creative Extremists: King’s Call to Action” Black History Month Lecture, Lemoyne-Owen College, February 2018

“You Can’t Get Around the Work: Race, Rights and the Perpetual Pursuit of Educational Justice”, Keynote Speech, National Council on Black American Affairs, October 2017

“Can You Hear Me Now? Affirmative Disruption and the Perpetual Pursuit of Black Humanity”, Ohio University – Athens, October 2016

“Fighting to Breathe: Race, History the Perpetual Battle for Black Life”, University of Cincinnati – Blue Ash College, February 2016

“Chasing Dreams: African Americans and the Perpetual Pursuit of Voting Rights,” Birmingham Civil Rights Institute, April 2015

“Talking in a Language Everyone Can Easily Understand: Insurgency, Invisibility, and the Perpetual Battle for Black Life,” Annual Alton Hornsby Lecture, Morehouse College, April 2015

“The Struggle is Eternal: Race, Memory and the Continual Challenge of Black Humanity,” *Winning the Race Conference*, Delta State University, March 2015

“Seeing the Unseen: Grappling with Race, History and the ‘fierce urgency of now,’” The Annual Kennedy Lecture, Ohio University – Chillicothe, February 2015

“The Perpetual Pursuit of Greater Freedom”, Barton College, September 2013

“(Re)building From the Ground Up: Local Studies and the Revolution in Civil Rights Scholarship”, Penn State University, April 2012

“Educating King: Civil Rights, the Liberal Arts and the Education That Changed A Nation”, King Day Lecture, Hastings College, January 2012

“Greater Freedom: The Civil Rights Struggle In Eastern North Carolina”, Lecture, Albany Civil Rights Institute, Albany, Georgia, June 2011

“Race, Rights and Redemption: Lessons from North Carolina’s Freedom Struggle”, Lecture, Rhodes College, February 2011

“Ain’t Gonna Let Nobody Turn Me Around: the Civil Rights Movement’s Significance.” Opening Lecture, Eleventh Annual Civil Rights Conference, University of Tennessee – Martin, February 2011

“The Crawl of an Arthritic Turtle: Race, Progress and Freedom in North Carolina.” Southern Studies Brown Bag Lunch and Lecture Series, University of Mississippi, November 2010

“Black Power: The Evolution.” Medgar Evers/Ella Baker Civil Rights Lecture Series, Jackson State University, April 2010

“Constitutional Reform in the New South.” Keynote Address, Charleston College of Law Inaugural Symposium, January 2009

“Rethinking working class activism in the Civil Rights Era.” Samuel Shannon Distinguished Lecture, Tennessee State University, March 2008

Selected Academic Presentations

“From Rights To Lives: The Evolution of the Black Freedom Struggle”, Organization of American Historians Conference, Chicago, IL, April 2025

“From Rights To Lives: The Evolving Black Freedom Struggle”, American Historical Association Conference, New York, NY January 2025

“The Language of Liberation: George Washington Lee and the construction of a civil rights narrative in Memphis, Tennessee,” College Language Association Conference, Memphis, TN, April 2024

“Dr. King and Economic Justice”, Project Humanities Lecture, Arizona State University, January 2024

“To Study A State To Know A Nation: North Carolina and the United States”, Final Plenary Session, Southern Historical Association, Charlotte, NC, November 2023

“The Political Worlds of George Washington Lee”, Nashville Conference on African American History and Culture, February 2023

“George Lee and the Politics of Black Representation”, Association for the Study of African American Life and History Conference, September 2022

“Confronting the Master Narrative of the Civil Rights Movement”, Gilder Lehrman Institute Presentation, July 2022

“The History and Philosophy of Black Lives Matter”, Panelist, University of Memphis Department of Philosophy, October 2020

“Teaching Movement History”, Presentation to Prof. Hasan Jeffries’ Civil Rights History Course, The Ohio State University, April 2020

Panel Discussion: “1619: Commemoration and the (After) Lives of Slavery” (Gordon Bigelow; Kijan Bloomfield; Trimiko Melancon; Charles McKinney), Rhodes College October 2019

“The Central Lesson: Teaching the Movement in a Time of Universal Deceit”, Opening Lecture, We Who Believe in Freedom: A Symposium on Teaching The Civil Rights Movement, June 2018

“Memphis Moving Forward: Confronting Poverty”, Panel Discussion, MLK50 Symposium, April 2018
(Panel can be viewed at: <https://www.youtube.com/watch?v=fdyOljVoiG4&feature=youtu.be>)

“Institution Building: The Age of Jim Crow”

“Continuity of Struggle: The Age of Jim Crow”

Two Invited Lectures, National Endowment for the Humanities Summer Institute for College and University Teachers, Jackson State University, June 2017

“Understanding and Teaching the Civil Rights Movement: An Exploration in Civil Rights Pedagogy”, American Historical Association Conference, January 2017

“Reconstruction’s Protean Post-Civil Rights Legacy”, Paper Presented at “Memories of a Massacre: Memphis in 1866, a Symposium Exploring Slavery, Emancipation, and Reconstruction.” May 2016

“Region, Race and Memory: Inheriting the Civil War”, Fort Pillow State Historic Park, April 2014

“‘It is a mistake for the Party to...write off the Negro’: Civil Rights and the Pursuit of Power at the Republican National Convention, 1964”, Association for the Study of African American Life and History Conference, October 2013

“Greater Freedom: The Civil Rights Struggle In Eastern North Carolina”, Lecture, Albany Civil Rights Institute, Albany, Georgia, June 2011

“Race, Rights and Redemption: Lessons from North Carolina’s Freedom Struggle”, Lecture, Rhodes College, February 2011

“The Crawl of an Arthritic Turtle: Race, Progress and Freedom in North Carolina.” Southern Studies Brown Bag Lunch and Lecture Series, University of Mississippi, November 2010

“Fighting Over the Future of the Past: History, Memory and Contemporary Black Politics.” Association for the Study of African American Life and History Conference, Cincinnati, Ohio, October 2009

Chair and Commentator, “Communities of Resistance Down East: Oral Histories of Working-Class Struggle in Eastern North Carolina.” Oral History Association Meeting, Oakland, California, October 2007

“Building History from the Ground Up: The Continued Relevance of Local Studies.” The Twenty-Fourth Annual Fannie Lou Hamer Memorial Symposium Lecture Series, The Hamer Institute, Jackson State University, October 2007 (Invited participant)

Panel Chair, “Race, Religion and Theology in the Public Square.” American Academy of Religion Conference, Nashville, Tennessee, March 2007

“Writing History, Building Freedom: How Black History Can Transform America – If We Let It.” Keynote Speech, Black History Month Program, Morehouse College, Atlanta, Georgia, February 2007

“Cracking Open the Black Box: Martin Luther King, Jr., the Media and the Continuing Challenge to Black Leadership.” National Media Reform Conference, January 2007

“‘We would be stronger if we came together’: Building a Working-Class Freedom Movement in the Rural South, 1968 – 1970.” Southern Historical Association Conference, Birmingham, Alabama, November 2006

“‘That Ain’t how I remember it!’: Oral History, Memory and the Transformation of Civil Rights Narratives in Wilson, North Carolina.” Oral History Association Conference, Little Rock, Arkansas, October 2006

“‘A Little too much for a self-respecting white man to swallow’: Black insurgency and white management in Wilson, North Carolina, 1955-1965.” Organization of American Historians Conference, Washington, DC, June 2006

“Memphis, Tennessee and the Confluence of Labor and Civil Rights: The Sanitation Workers Strike.” Landmarks of American Democracy Seminar of the National Endowment for the Humanities, July 2005

“‘Somewhere down the line, we decided to organize’: Fannie Corbett and the creation of a working class Freedom movement in Wilson, North Carolina, 1968-1970.” Thinking Through Action Conference, Vancouver, British Columbia, Canada. June 2005

“‘The brothers on the corner got my back’: Self-Defense and the creation of non-violent spaces in Wilson, North Carolina, 1963-1970.” American Historical Association Conference, Seattle, WA. January 2005 (paper accepted)

“‘They lynched a Negro in Hoover Time’: Race, Violence and the Limits of Civic Inclusion in Wilson, North Carolina, 1930-1964.” American Studies Association Conference, Hartford, Conn. October 2003

Selected Public/Community Presentations

“Civil Rights: Movement or Cycle?”, Hattiloo Theater Black History Month Lecture, February 2025

“Hidden Histories of Memphis”, City Year Memphis, July 2024

“Rethinking Black History: Beyond Dates and Figures”, St. Stephens Church of God in Christ Cathedral, San Diego, CA, February 2024

“Jazz and Justice”, North Cross School, Roanoke, Virginia, February 2024

“The Legacy of Martin Luther King, Jr.” Panel Discussion, Hosted by the United States Embassy, Qatar, February 2021

“Wear It: Our Crown Has Already Been Bought and Paid For”, Keynote Lecture for the Black Millennial Political Convention, Lemoyne-Owen College, March 2020

“The Many Faces of Educational Reform”, Keynote Lecture, Charter School Growth Fund National Conference, October 2019

“Wait, wait! I know that! What we can learn from Black History Month”, Kate Bond Elementary, February 2019

“Memphis Moving Forward: Confronting Poverty”, Panel Discussion, MLK50 Symposium, April 2018
(Panel can be viewed at: <https://www.youtube.com/watch?v=fdyOljVoiG4&feature=youtu.be>)

“Twenty-First Century Activism”, Panel Discussion, MLK50 Symposium, University of Memphis Law School, April 2018 (Panel can be viewed at: <https://www.youtube.com/watch?v=acwNBcdi8EI>)

“The Silence of our Friends: MLK’s Legacy and the Costs of Community”, Calvary Episcopal Church, February 2018

“You Can’t Get Around the Work: Race, Rights and the Perpetual Pursuit of Educational Justice”, Keynote Speech, National Council on Black American Affairs, October 2017

“Education Reform in Real Time”, The Memphis Lift Community Organization, September 2017

Panelist, “Telling Histories: Storytelling and Civil Rights”, Art Symposium on Photo Collection “Road through Midnight”, Tennessee State Museum, Nashville, TN, February 2015

Honors/Prizes/Awards/Grants

Director, Neighborhood Narratives Initiative, funded by Mellon Foundation Grant for developing the *Institute for Race and Social Transformation*, Rhodes College. Grant award: 800k for three years, 2023-2026

Mellon Faculty Innovation and Collaboration Fellowship: Health Equity, Human Flourishing, and Well-Being, Rhodes College, “Freedom Dreams: Building a Music, Justice and Voice Curriculum with the Memphis Music Initiative”, 2020-2021

Mellon Faculty Innovation and Collaboration Fellowship: Liberal Arts and Social Justice in the 21st Century, Rhodes College, “The Meaning of Freedom: Teaching the Civil Rights Movement”, 2019-2020

Rhodes College Clarence Day Award for Outstanding Teaching, (The College’s Highest Teaching Award) May 2018

Hill Grant for Curricular Development, Africana Studies, 2015-16. (Grant to create two new courses in Africana Studies for Fall of 2018)

Hill Grant for Curricular Development, Co-Recipient, Fall 2015 (New Course in African American Music)
CODA (Center for Outreach and Development of the Arts) Faculty Staff Grant, Fall 2014

Participant, Advanced Oral History Summer Institute, Regional Oral History Office, University of California, Berkley, Summer 2012

Mellon Foundation Faculty Career Enhancement Grant, June 2012

R.W.D. Connor Award, Given by the Historical Society of North Carolina for Outstanding Article in the *North Carolina Historical Review*, 2011

Rhodes Student Government Outstanding Faculty Member Award, April 2007

Spirit Award, Black Student Association, April 2006

Campus and Community Service

Board Member, Workers Interfaith Network, 2025 – Present

Steering Committee Chair, Memphis for All (<https://www.memphisforall.com/>), 2022 – Present

Board Member, Memphis Music Initiative, 2020 – Present

Member, Community Initiatives Committee, Community Foundation of Greater Memphis, 2023 – Present

Shelby County Historical Commission (Elected by Shelby County Commission), 2022-2026

Campus Safety Task Force, October 2022

Primary Organizer, Rhodes #ScholarStrike, September 2020

Keynote Speaker, “The Last Lecture”, Rhodes College, April 2020

Director, Africana Studies Program (2012 – 2024)

Faculty Trustee, Board of Trustees (2019 – 2021)

Faculty Advisor, Black Student Association (2019 – Present)

Member, Faculty Task Force on Diversity and Retention (2019 – Present)

Member, Mellon Foundation African Diaspora Exchange Program (2019 – Present)

Member, Faculty Governance Committee, (2015-2017)

Member, President’s Commission on Campus Climate, (Spring 2015)

Principal Conference Organizer, "From Civil War to Civil Rights: Race, Region and the Making of Public Memory", (Spring 2014)
Member, Admissions Policy Committee, Humanities Representative (2009-2012)
Urban Studies Program Committee (2005-2009)

Service to the Profession

Manuscript Review

Academic Presses

University of Arkansas Press
University of Georgia Press
University of North Carolina Press
University Press of Florida
University Press of Kentucky
University Press of Mississippi
Palgrave Macmillan

Journals

Journal of African American History
Journal of Southern History
Journal of Urban History
North Carolina Historical Review
Oral History Review

Professional Appointments

Editorial Board, *Journal of African American History*, 2023-2026

Lead Scholar, Gilder Lehrman Institute of American History Summer Seminar in Civil Rights. 2016-2019, 2023

Advisory Board, Politics and Culture in the Twentieth Century South Series, University of Georgia Press, 2023 – Present

Executive Council, Southern Historical Association, (Elected Member), 2021-2023

Juror, Stone Book Award, Museum of African American History, (Boston), 2021 – Present

Inaugural Scholar-In-Residence, National Civil Rights Museum, 2018-2019

Juror, Benjamin L. Hooks Book Award Committee, University of Memphis, 2018 - 2024

Committee Member, Organization of American Historians' *Liberty Legacy Foundation Award Committee*, Award given annually for the best book by a historian on the civil rights struggle from the beginnings of the nation to the present, 2021-2023

Program/Department Reviews

Consultant, Africana Studies Major Proposal Initiative, Grinnell College, 2022

External Review Team, Connecticut College History Department, 2017

External Proposal Reviewer, The College of New Jersey, December 2014. Reviewed the College's proposal to establish a Bachelor of Arts Degree in African American Studies. (Major approved in January of 2016)

Consulting

Content Area Scholar, National Civil Rights Museum, 2024

Historical Consultant, Orpheum Theater, Memphis, TN, 2022 – 2023. Wrote historical panel text for *The Balcony Project* (panels can be accessed at <https://orpheum-memphis.com/about-us/the-balcony-project/>)

Curriculum Consultant, Memphis Music Initiative, 2020-2021

Interpretive Plan Development and Advising Scholar, National Civil Rights Museum Redesign Team, 2009 – 2010

Professional Memberships

American Historical Association
American Studies Association
Association for the Study of African American Life and History
National Council for Black Studies
Oral History Association
Organization of American Historians
Southern Historical Association

EXHIBIT F

VICKI HALE, *et al.*

 Plaintiffs,

V.

WILLIAM LEE, *et al.*,

 Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE	§	
OF THE NAACP, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	Case No. 3:26-cv-00638
V.	§	[Consolidated Case]
	§	
TRE HARGETT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I am the National Campaigns Director at the National Association for the Advancement of Colored People (“NAACP”).
3. The NAACP is a non-partisan organization headquartered in Baltimore, Maryland.
4. The NAACP, which was founded on February 12, 1909, is the oldest and largest civil rights organization in the United States. Its mission is to achieve equality, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color.

5. The NAACP includes a network of units throughout the United States, including state and state-regional conferences that cover every state, plus the District of Columbia. The NAACP has over two thousand local branches, college chapter, prison chapters, and youth councils, including in the state of Tennessee.
6. In total, the NAACP has approximately 200,000 dues-paying members, including registered voters through the United States.
7. In my role as National Campaigns Director for the NAACP, my work includes developing and implementing the organization's large-scale voter mobilization initiatives, including voter registration, education, and protection efforts, focused on Black communities and youth voters. Through this work, I am familiar with and regularly receive update about the NAACP's voting-related activities from our state and regional conferences across the country, including Tennessee.
8. To execute part of its core mission of protecting and advancing voting rights, the NAACP works to mobilize voters through robust non-partisan civic engagement and election-related programming, including year-round voter registration and education efforts.
9. The NAACP's voter registration and engagement activities include voter registration drives and voter outreach conducted by our national network of state conferences, such as the NAACP Tennessee State Conference, and local branches. This is achieved through door to door canvassing, site based organizing and event-based organizing to provide community members with voter registration and election information. Further, in conjunction with partners across the country the NAACP has launched programs focused on turning out voters through direct voter contact, mass communication, targeted digital mobilization, community organizing, and SMS texting.
10. In addition to the on-the-ground outreach and get-out-the-vote activities, we also provide education, non-partisan voter guides, and resources on elections / issues on the ballot, locating polling places, and navigate absentee and mail-in voting procedures.
11. NAACP members and volunteers are deeply involved in their communities, working to achieve the NAACP's mission on local, state, and federal levels. In order to fulfill its longstanding mission and continue with the efforts it has conducted for decades to assist individual voters in exercising their right to vote, the NAACP is expending all and will need to continue to expend considerable staff and financial resources to educate its members on how these changes will affect their access to voting. This includes, but is not limited to: training, print resources, digital content and event planning.
12. As a result of the late-decade redistricting effort, fewer eligible Tennessee voters are likely to cast a ballot for a candidate of their choice, which directly harms the NAACP's goal of ensuring that as many eligible U.S. citizens are registered to vote as possible. Particularly affecting youth and digitally unconnected voters.

13. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this __4th__ day of June 2026.



Tyler Sterling

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VICKI HALE, *et al.*

Plaintiffs,

V.

WILLIAM LEE, *et al.*,

Defendants.

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Case No. 3:26-cv-00603
[Lead Case]

TENNESSEE STATE CONFERENCE
OF THE NAACP, *et al.*

Plaintiffs,

V.

TRE HARGETT, *et al.*,

Defendants.

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Case No. 3:26-cv-00638
[Consolidated Case]

DECLARATION OF GLORIA SWEET-LOVE

I, Gloria Sweet-Love, having been duly sworn, do hereby swear and affirm as follows:

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I am a Black U.S. citizen.
3. I was born in the year 1947.
4. I am lawfully registered to vote and vote regularly in federal, state, and local elections.
5. In addition to my personal capacity, I am the President of the National Association for the Advancement of Colored People's Tennessee State Conference ("NAACP Tennessee").

6. The NAACP was founded on February 12, 1909 and is the oldest, largest, and most widely recognized grassroots-based civil rights organization.
7. The NAACP Tennessee was founded in 1946 to serve as the Tennessee subsidiary of the National Association for the Advancement of Colored People (“NAACP”).
8. The NAACP Tennessee is a nonpartisan organization with members across the state of Tennessee. The NAACP Tennessee is formed under Section 501(c)(3) of the Internal Revenue Code. The mission of the NAACP Tennessee is to eliminate race-based discrimination through securing political, educational, social, and economic equality rights and ensuring the health and well-being of all people. The NAACP Tennessee achieves this mission by providing vital information and services to individual units throughout the state.
9. Since 1996, I have served as the President of the NAACP Tennessee. As President of the NAACP Tennessee, I am responsible for overseeing and coordinating the activities all of the adult branches, college chapters, and youth councils within the state of Tennessee. I am also familiar with the various challenges that our members and constituents face, including challenges related to voting rights, civil rights, and individual privacy.
10. The NAACP Tennessee has three regional divisions—Eastern, Middle, and Western Tennessee—as well as 70 local branch units and 16 college chapters and youth councils.
11. The NAACP Tennessee and most of its local branch units are primarily volunteer-run, and all officers are volunteers. In total, the NAACP Tennessee has 5,699 members across the state. Predominately, the members of the NAACP Tennessee are Black; however, the organization also has members from the Hispanic community, other communities of color, and white members. Many Black members of the NAACP Tennessee are residents and registered voters in the previous long-standing Congressional District 9 and are long-time residents of Memphis and Shelby County with generations spanning back several decades.
12. Two central goals of the NAACP Tennessee are to 1) eliminate racial discrimination in the democratic process and 2) to enforce federal laws and constitutional provisions that secure voting rights for all people. Towards those ends, the NAACP has filed several lawsuits to protect the right to vote, regularly engages in efforts to register and educate Black voters and all persons, and encourages Black Tennesseans to engage in the political process by turning out the vote on Election Day.
13. The NAACP Tennessee regularly and actively engages in voter registration, voter education, and voter mobilization efforts. The NAACP Tennessee educates voters regarding polling place locations, registration deadlines, and candidate qualifying requirements. Additionally, the NAACP Tennessee utilizes phone banking, texting, radio advertisements, and church events to educate and encourage voters to exercise their right to vote and vote in all elections.

14. As a result of the repeal of Tennessee Annotated Code 2-16-102, the NAACP Tennessee will have to divert substantial resources to educate voters on how to identify their new congressional districts. The new notice law also requires notice to be placed online for people to search on a website on how to locate their polling place. However, many members of the NAACP Tennessee are residents in the rural areas of the state do not have access to the internet. As a result, these members are unable to access the online web materials to identify their new congressional district. Furthermore, the NAACP Tennessee will have to devote additional resources to educate its members and the public about the online portal.
15. As a result of the late-decade redistricting changes, I have firsthand knowledge, both personally and as President of the NAACP Tennessee State Conference, of many individuals whose representation, voting power, and connection to their communities will be directly affected by the changes to Congressional District 9.
16. As a result, the NAACP Tennessee will need to expend significant additional resources to educate candidates and the public about the candidate qualifying requirements, promotes compliance, and mitigate confusion surrounding the qualifying process. Several members of the Tennessee Black Caucus are also members of the NAACP Tennessee and those members are impacted by the recent relaxed candidate qualifying requirements.
17. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of June 2026 in Brownsville TN

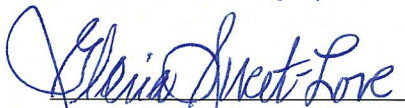

Gloria Sweet-Love

EXHIBIT H

VICKI HALE, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	
V.	§	Case No. 3:26-cv-00603
	§	[Lead Case]
WILLIAM LEE, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	
TENNESSEE STATE CONFERENCE	§	
OF THE NAACP, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	
V.	§	Case No. 3:26-cv-00638
	§	[Consolidated Case]
	§	
TRE HARGETT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	

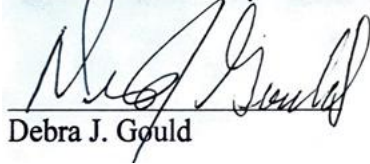
I, Debra Gould, having been duly sworn, do hereby swear and affirm as follows:

- Case 3:26-cv-00638 Document 31-9 Filed 06/09/26 Page 2 of 4 PageID #: 444

4. LWVTN was founded in 1920. LWVTN is a volunteer-led nonpartisan 501(c)(3) political organization which encourages informed and active participation of Tennesseans in government and influences public policy through education and advocacy.
5. LWVTN is an affiliate organization of the League of Women Voters of the U.S.
6. LWVTN is a volunteer organization with over 1,000 members statewide, spread out amongst nine local leagues with additional members at large across the state of Tennessee.
7. League members, including communities of color, reside in each of the three challenged districts in Shelby County. The League of Women Voters of Memphis/Shelby County has members in Congressional District 5, 8, and 9.
8. The League of Women Voters of Williamson County and the League of Women Voters of Murfreesboro-Rutherford County have members in the redrawn Districts 5 and 9.
9. The League of Women Voters of Memphis/ Shelby County are regularly engaged in non-partisan activities that include voter registration, candidate forums, public policy forums, and events. These activities reflected the interests and concerns of their urban community with its majority-minority population. Due to the new redistricting plan, they will have to devote additional time and resources to educate their members and the public about the new congressional districts in Shelby County.
10. In 2022 in preparation for the regularly scheduled redistricting process, LWVTN, NAACP, and other non-partisan organizations conducted focus groups across the state to learn what redistricting priorities the public wanted. The message was clear. The priorities were twofold: provide urban representation for urban areas and rural representation for rural areas and keep communities whole. The newly redrawn Congressional Districts 5, 8, and 9 do not meet either criterion.
11. The League of Women Voters of Memphis/Shelby County and LWVTN through their advocacy and voter outreach continually encourage members of the public to communicate directly with their elected local, state, and federal officials about public policy issues that impact their communities. By trisecting Memphis/Shelby County, the Tennessee legislature has eliminated the ability of the community as a whole to effectively communicate about the issues that matter most to their congressional representative.
12. The redrawn congressional districts that fracture Memphis/Shelby County into Congressional Districts 5, 8, and 9, have an impact on the rest of the state as well. There are significant changes in the shape of Congressional Districts 4, 6 and 7. These changes that were made so close the August 2026 create a significant organizational burden for LWVTN in our primary mission of providing voters with the information they need prior to an election.

13. As a result of the new redistricting plan, LWVTN will have greater difficulty in conducting civic engagement activities. Because the new plan has led to chaos and confusion for the public, many Tennessee voters are unaware of their newly assigned districts. The legislation creating the challenged districts specifically lifted the requirement that local election commissions must notify voters of this change by mail. LWVTN will need to conduct new and novel forms of outreach to inform voters of these changes in the brief remaining timeline before the August 2026 primary.
14. The League of Women Voters of Memphis/Shelby County provides educational resources and voting information for residents of Shelby County. With the newly redrawn Congressional Districts 5, 8, and 9, LWVTN and the League of Women Voters of Memphis/Shelby County must now distribute information from Memphis to Williamson County. That area includes largely rural areas that do not have local newspapers or traditional media outlets with a broad coverage, thereby creating a huge communications and outreach challenge for LWVTN.
15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of June 2026 in Nashville, TN.



Debra J. Gould

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF DAWN HARRINGTON

I, Dawn Harrington, having been duly sworn, do hereby swear and affirm as follows:

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I live in Nashville, Tennessee.
2. I am the Executive Director of Free Hearts.
3. Free Hearts was founded in Nashville, Tennessee in 2016.
4. Free Hearts is an organization led by formerly incarcerated women that provides support, education, and advocacy in organizing families impacted by incarceration, with the ultimate goals of reuniting families and keeping families together. It has leadership across 18 counties in Tennessee, including Shelby County.
5. Free Hearts' work includes voter education, voting rights restoration, voter participation, and fighting voter suppression.
6. Free Hearts has members, including Black members, and other members of color who are registered voters and reside in former Congressional District ("CD") 9 and all three of the purported Districts that have been created from dismantled CD 9. The Free Hearts'

members' voting power has been reduced given the configuration of the districts in those counties.

7. Under the new Congressional plan, it is difficult for Black voters and Hispanic voters to elect the candidates of their choice. As a result, many voters have stated they believe their vote does not count. Under such conditions, it is more challenging to persuade many Black voters and Hispanic voters to participate in the electoral process. This is especially true for formerly incarcerated and convicted people who must overcome significant legal and procedural hurdles to restore their voting rights.
8. To combat the effects of the new map on communities of color throughout the state, Free Hearts will have to devote more time and resources to voter registration, voter education, and get-out-the-vote efforts, which would have otherwise been spent on Free Hearts' core mission activities.
15. In bringing this litigation, I understand that Free Hearts stands in the shoes of its members for associational standing purposes. As such, as Executive Director for Free Hearts, I can represent that the organization has at least one member in the aforementioned districts.
16. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of June 2026 in Santa Cruz, California.



Dawn Harrington
Executive Director
Free Hearts

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF VICKIE TERRY

I, Vickie Terry, am over the age of eighteen and am fully competent to make this declaration. I have personal knowledge of the facts stated herein and declare the following to be true and correct:

1. I am African American or Black.
2. I was born in the year 1960.
3. I am a member of the Tennessee State Conference of the NAACP. I have been a member of the Tennessee State Conference of the NAACP for more than 10 years and was a member of the Tennessee State Conference of the NAACP on May 13, 2026 when the complaint was filed in this case.
4. I reside and am registered to vote in Shelby County. I have lived in Shelby Country for 66 years.
5. I am a qualified voter pursuant to Sec. 2-2-102 of the Tennessee Code.
6. I reside and vote in Congressional ("CD") 8 after the passage of HB 7003.

7. I voted in CD 9 in 2022 and 2024. As a result of changes to the boundaries of my district following the 2026 mid-decade congressional redistricting, I will be impeded in electing candidates of my choice.

8. I intend to vote in future elections in CD 8, and in any other district in which I am eligible to vote, if a candidate that I support is on the ballot.

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

Executed in Memphis, Tennessee on 4th day of June, 2026.


VICKIE TERRY

EXHIBIT K

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF NOEL HUTCHINSON

I, Noel Hutchinson, am over the age of eighteen and am fully competent to make this declaration. I have personal knowledge of the facts stated herein and declare the following to be true and correct:

1. I am African American or Black.
2. I was born in the year 1961.
3. I am a lifetime member of the Tennessee State Conference of the NAACP.
4. I was a lifetime member of the Tennessee State Conference of the NAACP at the time the complaint was filed in this case, on May 13, 2026.
5. I reside and am registered to vote in Congressional District (“CD”) 9, in Shelby County. I have lived in Shelby County for thirty-one (31) years.
6. I am a qualified voter pursuant to Sec. 2-2-102 of the Tennessee Code.
7. I reside and vote in CD 5 after the passage of HB 7003.

8. I voted in CD 9 in 2022 and 2024. As a result of changes to the boundaries of my district following the 2026 mid-decade congressional redistricting, I will be impeded in electing candidates of my choice.

9. I intend to vote in future elections in CD 5, and in any other district in which I am eligible to vote, if a candidate that I support is on the ballot.

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

Executed in Memphis, Tennessee on 6/3/26.

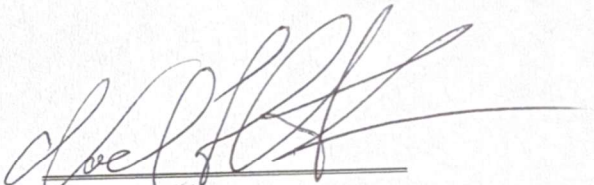

Noel Hutchinson

EXHIBIT L

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF MARVIN F. THOMAS, SR.

I, Marvin F. Thomas, Sr., am over the age of eighteen and am fully competent to make this declaration. I have personal knowledge of the facts stated herein and declare the following to be true and correct:

1. I am African American or Black.
2. I was born in the year 1954.
3. I am a lifetime member of the Tennessee State Conference of the NAACP.
4. I am a member of the National Board of Directors for the NAACP.
5. I was a lifetime member of the Tennessee State Conference of the NAACP at the time the complaint was filed in this case, on May 13, 2026.
6. I reside and am registered to vote in Congressional District ("CD") 9, in Shelby County. I have lived in Shelby County for over three and a half (3.5) years.
7. I am a qualified voter pursuant to Sec. 2-2-102 of the Tennessee Code.
8. I reside and vote in CD 5 after the passage of HB 7003.

9. I voted in CD 9 in 2024. As a result of changes to the boundaries of my district following the 2026 mid-decade congressional redistricting, I will be impeded in electing candidates of my choice.

10. I intend to vote in future elections in CD 5, and in any other district in which I am eligible to vote, if a candidate that I support is on the ballot.

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

Executed in Memphis, Tennessee on 6/4/24.


Marvin F. Thomas Sr.

EXHIBIT M

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF TAJUAN STOUT MITCHELL

I, Tajuan Stout Mitchell, am over the age of eighteen and am fully competent to make this declaration. I have personal knowledge of the facts stated herein and declare the following to be true and correct:

1. I am African American or Black.
2. I was born in the year 1952.
3. I am a member of the Tennessee State Conference of the NAACP. I am a lifelong member of the national NAACP and was a member of the Tennessee State Conference of the NAACP on May 13, 2026 when the complaint was filed in this case.
4. I reside and am registered to vote in Shelby County. I have resided there for 68 years.
5. I am a qualified voter pursuant to Sec. 2-2-102 of the Tennessee Code.
6. I reside and vote in Congressional ("CD") 9 after the passage of HB 7003.

7. I voted in CD 9 in 2024. As a result of changes to the boundaries of my district following the 2026 mid-decade congressional redistricting, I will be impeded in electing candidates of my choice.

8. Currently urban centers, like Memphis, do not get visits or listening tours from our Senators and now we will not be heard by our Congressional Representatives. When we cannot elect the candidate of our choosing, our concerns are reduced to crime, ignoring economic development, food insecurity, housing, environmental injustices, and health care. We pay our taxes but are not offered the full menu of services.

9. I intend to vote in future elections in CD 9, and in any other district in which I am eligible to vote, if a candidate that I support is on the ballot.

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

Executed in Memphis, Tennessee on June 2, 2026.


TAJUAN STOUT MITCHELL

EXHIBIT N

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE OF THE
NAACP, LEAGUE OF WOMEN VOTERS OF
TENNESSEE, SHELBY COUNTY VOTERS
ALLIANCE, FREE HEARTS, MEMPHIS
URBAN LEAGUE, VICKIE TERRY, NOEL
HUTCHINSON, PASTOR IVORY JACKSON,
BISHOP MARVIN F. THOMAS, SR.,
TAJUAN STOUT MITCHELL, and GLORIA
SWEET-LOVE,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee; the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, JIMMY ELDRIDGE,
MIKE MCDONALD, SECONDRA
MEADOWS, VANECIA BELSER KIMBROW,
and KENT YOUNCE, in their official capacities
as members of the State Election Commission,

Defendants.

Case No. 3:26-cv-638

**DECLARATION OF CICELY SHARP IN SUPPORT OF PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

I, Cicely Sharp, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Black U.S. citizen and resident of Memphis, Tennessee, where I have lived all my life.
2. I am a lawfully registered voter. I regularly vote in local, state, and federal elections.

3. I was born and raised in Memphis, Tennessee. I attended college at University of Tennessee in Knoxville. Prior to 2026, I was registered to vote in Congressional District 9. After the most recent May 2026 redistricting, I am registered to vote in Congressional District 5.

4. I am currently the Vice President of the Memphis Urban League Young Professionals (“MULYP”). I joined the MULYP in 2018, and I became its Vice President in January 2026. I am also a member of the Memphis Urban League (“MUL”).

5. MULYP is an initiative within MUL that provides young professional members ages 21-40 unique networking, professional development, and volunteer opportunities. Though MULYP has its own leadership team, it operates within MUL’s nonprofit structure and under the leadership of MUL’s President and CEO. In addition to MUL’s programmatic pillars, MULYP provides critical civil engagement and advocacy support to ensure that Memphians are informed and educated on political issues that affect their lives and communities. MULYP members meet monthly to discuss upcoming events, ongoing projects, and any updates from the National Urban League, MUL, or other affiliates. Any member of MULYP is automatically a member of the National Urban League, National Urban League Young Professionals, and MUL.

6. MULYP has at least 50 young professionals who pay annual dues to be a part of MULYP and who are also members of MUL. MULYP primarily derives its funding from these membership dues. MULYP has also set aside a specific budget dedicated to civic-engagement and voter-education work in Memphis.

7. As Vice President I am charged with leading MULYP’s committees and supporting their varied programming. MULYP has five committees: Health and wellness, financial literacy, youth development, civic engagement, personal and professional development.

8. As part of its core programmatic work, MULYP organizes and participates in nonpartisan voter-education and voter-registration events. As part of my duties as Vice President, I am familiar with MULYP's voting-related work. In its nonpartisan voter education events, MULYP members share information with potential voters on the congressional district they live in, the details of upcoming elections and candidates, and how to cast an effective ballot. During its nonpartisan voter-registration events, MULYP members register potential voters and participate in dialogues on the importance of voting and civic engagement. Before upcoming elections, MULYP regularly hosts these nonpartisan voter-education and voter-registration events including knocking on doors to encourage people to register to vote and phone banking to encourage infrequent voters to cast their ballot. For instance, in 2024, MULYP held an event called "Pop Quiz to the Polls" which took seniors from local Memphis high schools to the polls as first-time voters.

9. Before the General Assembly enacted the May 2026 Map, MULYP had participated in nonpartisan voter-education events and shared information and materials with potential voters using the previous congressional map. As a result of the May 2026 Map, MULYP will need to reallocate its political-participation budget, revise its voter-education materials and provide additional training to members so that they can provide current and accurate information to potential voters on their congressional map.

10. To me personally, the General Assembly's decision to enact a map that cracks Memphis across three congressional districts inhibits Black Memphians from having their voices heard and needs met because they now are in a congressional district with far-flung communities with disparate priorities.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on June 7, 2026 in Memphis, Tennessee.



Cicely Sharp

EXHIBIT O

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE OF THE
NAACP, LEAGUE OF WOMEN VOTERS OF
TENNESSEE, SHELBY COUNTY VOTERS
ALLIANCE, FREE HEARTS, MEMPHIS
URBAN LEAGUE, VICKIE TERRY, NOEL
HUTCHINSON, PASTOR IVORY JACKSON,
BISHOP MARVIN F. THOMAS, SR.,
TAJUAN STOUT MITCHELL, and GLORIA
SWEET-LOVE,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee; the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, JIMMY ELDRIDGE,
MIKE MCDONALD, SECONDRA
MEADOWS, VANECIA BELSER KIMBROW,
and KENT YOUNCE, in their official capacities
as members of the State Election Commission,

Defendants.

Case No. 3:26-cv-638

**DECLARATION OF GALE JONES CARSON ON BEHALF OF
MEMPHIS URBAN LEAGUE IN SUPPORT OF PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

I, Gale Jones Carson, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Black U.S. citizen and resident of Memphis, Tennessee, where I have lived all my life.
2. I am a lawfully registered voter. I regularly vote in local, state, and federal elections.

3. I have always voted in the congressional district for Memphis. Prior to 2002, I voted in Congressional District 8. After the 2002 redistricting, I voted in Congressional District 9. After the most recent May 2026 redistricting, I will vote in Congressional District 5.

4. I earned my college degree in broadcast journalism from the University of Memphis. Since then, I have worked as a journalist, in communications at FedEx, as an executive assistant and chief spokesperson for the Mayor of the City of Memphis, and, most recently, as Vice President of Community & External Affairs at Memphis Light, Gas and Water. I retired from my role at Memphis Light, Gas and Water in October 2023.

5. I am currently the President and CEO of the Memphis Urban League (“MUL”). I became Interim President and CEO in March 2024 and became the permanent President and CEO in November 2024.

6. I have been a member of MUL since 2024. During this time, I have been responsible for the overall leadership, management, and strategic direction of the organization. This includes developing and implementing strategic plans, overseeing daily operations, managing staff, and cultivating relationships with stakeholders. Fundraising, financial management, and focusing on impactful programming and events centered around improving and elevating citizens in Memphis and Shelby County to improve and expand their economic opportunities.

7. Through my current leadership role and membership, I am familiar with and receive updates about MUL’s voting-related activities and initiatives that focus on many different issues, including nonpartisan civic engagement, election education, and other advocacy.

8. I also serve on the boards of Cocaine Alcohol Awareness Program Inc. (CAAP), Women’s Foundation for a Greater Memphis, Association of Executives of United Way Agencies (AEUWA), and Memphis & Shelby County Film & Tape Commission and Technology-

Enhanced Advanced Mobility in Tennessee (TEAM TN). I am also a member of the U.S. Commission on Civil Rights State Advisory Committee and National Association for the Advancement of Colored People (NAACP) Tennessee State Conference, and serve as Vice President of the NAACP Memphis branch.

Memphis Urban League

9. MUL, a 501(c)(3) nonprofit and nonpartisan membership organization, is an affiliate of the National Urban league, which was formed in 1910. MUL was founded in 1943 and is one of the 93 affiliates of the National Urban League, serving over 300 communities in 37 states and the District of Columbia. Consistent with National Urban League's nationwide mission, MUL seeks to empower all members of the Memphis community towards self-sufficiency and shared prosperity.

10. MUL is a social justice organization that designs and offers programs to build skills, expand opportunities, and strengthen the Memphis community. We have five key programmatic pillars: workforce & economic development; digital skills & education; education & youth development; business entrepreneurship training accelerator; and financial literacy & empowerment. We also develop programming in other areas through our Memphis Urban League Young Professionals (MULYP) group discussed in greater detail below.

11. As of 2026, we have seven employees, including myself. While our membership count varies depending on how many individuals pay dues each year, we consistently at least have between 25-50 dues-paying members. In addition, we have at least 60 young professionals who pay dues to be a part of MULYP and who are also members of MUL as explained below. We have over 100 members, volunteers, and others on our distribution list.

12. MUL officers and board members frequently convene to discuss updates and programming. The Executive Committee, which includes the Board Chairperson, Vice Chairperson, Secretary, Treasurer and any chairperson of a standing committee, meets at least quarterly to discuss ongoing action items, board agenda items, and events that require Board approval. MULYP members meet monthly to discuss upcoming events, ongoing projects, and any updates from the National Urban League, MUL, or other affiliates.

13. Young professionals, ages 21-40, who want to further MUL's mission can also become a member by joining MULYP, which provides members unique networking, professional development, and volunteer opportunities. Though MULYP has its own leadership team, it still operates within MUL's nonprofit structure and under the leadership of MUL's President and CEO. In addition to MUL's programmatic pillars, MULYP provides critical civil engagement and advocacy support to ensure that Memphians are informed and educated on political issues that affect their lives and communities. Any member of MULYP are automatically members of the National Urban League, National Urban League Young Professionals, and MUL.

14. On behalf of its members and other constituents, MUL expends significant time and resources to hold and sponsor voter education and registration events every year. Many of these events are in collaboration with National Urban League, our MULYP members, local organizations, and school districts to ensure Memphians are registered to vote in advance of upcoming elections. For example, during the 2024 election cycle, MUL and MULYP members knocked on over 250 doors of potential voters, held six get-out-the-vote and voter registration events, four voter registration drives, one canvassing event, and held an event to transport over 80 high school seniors to polls so they could vote for the first time.

Tennessee General Assembly's Targeting of Memphis

15. Based on my experience and role as President and CEO of MUL, I believe Tennessee's General Assembly has targeted Memphis, MUL's members, and Memphians at large. This has made me and other MUL members increasingly concerned as the Legislature tries to dismantle Black Memphians' collective power.

16. The Legislature and Governor Bill Lee's recent actions related to the Memphis-Shelby County School Board is one such example of the State's excessive interference and control over our local governance. On May 22, 2026, Governor Lee signed legislation that allows state officials to seize control over Memphis-Shelby County School Board. I understand that the Governor, alongside two other White state lawmakers, has appointed eight out of the nine-person oversight board that will have complete decision-making power over the faculty decisions, curriculum, and budget of a majority Black school district.

17. This decision, as well as the General Assembly's recently redrawn congressional map breaking up Memphis, has made me and other MUL members concerned that they are intentionally targeting Memphis and Shelby County because we are historically a majority Black city and county.

Impact of the 2026 Congressional Map on MUL and Its Members

18. In preparation for the 2026 midterm elections, MUL and MULYP have spent the last six months engaging with Memphians to educate them on their congressional district, congressional candidates, and ballot issues. As a part of the National Urban League's 2026 Reclaim Your Vote campaign, MUL and MULYP have been preparing in-person and webinar events to educate Memphians on the 2026 midterms voter registration requirements and deadlines, polling locations, and the candidates and issues. MUL has also been working with local organizations

and churches to build out its community outreach efforts and disseminate critical information on the upcoming election, voter registration, and voter education. Much of this work will need to be redone as a result of the legislature's 2026 congressional redistricting.

19. MULYP has also set aside a specific budget dedicated to civic engagement and voter education work in Memphis. Following the 2026 congressional redistricting, MUL and MULYP will work with partner organizations to raise funds to revise its voter education materials and ensure that Memphians are fully educated on their updated congressional district, polling locations, and congressional candidates.

20. Many of our members are also affected by the new 2026 congressional map. Since 2022, members that live in Memphis have understood that they will be voting in Congressional District 9 for the upcoming midterms. For majority of our members—as well as Memphis—that is no longer the case. And, importantly, many of our members and Memphians at large lead full lives—working full time, sometimes working multiple jobs, raising children, taking care of family members—and are not able to closely follow the legislative proceedings or the news to understand the complicated changes to the congressional districts. This has led to confusion and concern about how to vote. I understand that members and other Memphians generally are facing great confusion and concern about which district to vote in, which candidates to vote for, and which polling sites to go to.

21. It is important for me, other members of MUL and Black Memphians to have meaningful influence in congressional representative. It is imperative that we have an elected official who represents and serves our needs. I understand that the Tennessee General Assembly has redrawn the congressional map in a way that makes it impossible for Memphians to elect their candidate

of choice. This has harmed MUL members and Black Memphians at large because it means that we no longer have a say over who represents us.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on June 7, 2026, in Memphis, Tennessee.

A handwritten signature in blue ink, appearing to read "Gale Jones Carson", with a stylized flourish at the end.

Gale Jones Carson

EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF IAN RANDOLPH

I, Ian Randolph, having been duly sworn, do hereby swear and affirm as follows:

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I live in Memphis, Tennessee.
3. I am the Director of the Shelby County Voters Association ("SCVA").
4. I was also the Director of the Shelby County Voters Association when the challenged redistricting plan, HB 7003, was adopted.
5. The Shelby County Voters Association was founded in Memphis, Tennessee in 2019.
6. The Shelby County Voters Association is a nonpartisan, volunteer-driven organization dedicated to ensuring the political equality of all residents of Shelby County. The SCVA coordinates the efforts of approximately 700 volunteers across the region.

7. The SCVA's work touches everything that has something to do with voting. The SCVA's core activities include voter education, voter registration, voter mobilization, and get-out-the-vote ("GOTV") efforts, including phone banking, text banking, mailing GOTV postcards, and directly contacting inactive voters. The SCVA provides on-the-ground assistance to voters, including coordinating transportation to the polls on Election Day.

8. SCVA also hosts and facilitates civic engagement and education events like town halls with elected leaders and forums on pressing community issues like environmental reform.

9. SCVA focuses these efforts primarily on Black voters, and other voters of color.

10. In my role as Director of the Shelby County Voters Association, I oversee the SCVA's day-to-day operations, manage GOTV efforts, direct volunteer resources and allocations, serve as the face of the organization in television and radio interviews and at public events, speak at civic events on the SCVA's behalf, and support the organization's fundraising activities.

11. To combat the effects of the new map on communities of color throughout Shelby County, the SCVA will have to devote more time and resources to voter registration, voter education, and GOTV efforts, which would have otherwise been spent on the SCVA's core mission activities. The SCVA will need to spend more time canvassing and door knocking to motivate discouraged voters to vote in their new districts. We will need to develop new strategies to drive voter engagement and train volunteers in those new strategies. We will need to develop new resources directing voters to their new polling places and expand our Election Day transportation services to cover polling places in all 3 new districts. All these changes will make SCVA's GOTV efforts less efficient and more expensive than in past years. Because the Shelby County Voters Association is a volunteer organization, by allocating time and resources to these

priorities, the SCVA will be unable to commit to other programs that are central to its mission like civic engagement and educational programs.

12. The Shelby County Voters Association organizes voters who reside in the former Congressional District 9 ("CD 9") and in all three of the districts that have been created out of the dismantled CD 9, CD 5, 8, and 9. Those voters' voting power has been reduced given the configuration of the new districts.

13. Many of the SCVA volunteers are Black or other people of color. As with the voters that SCVA supports, many of our volunteers who organize, live and vote in former Congressional District 9 ("CD 9") now live in the newly redrawn Shelby County congressional districts in HB 7003—CD 5, CD 8, and CD 9. Their voting power has been similarly reduced given the configuration of the new districts.

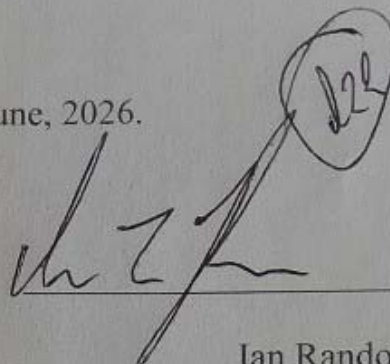
14. Under the new Congressional plan, it is difficult for Black voters and voters of color to elect the candidates of their choice. As a result, many voters have stated they believe their vote does not count. Under such conditions, it is more challenging to persuade Black voters and voters of color to participate in the electoral process.

15. These conditions further result in the SCVA needing to spend more time, effort, and resources on GOTV and organizing efforts in these communities, restricting resources that could be spent on the other critical components of SCVA's mission.

16. In bringing this litigation, I understand that the Shelby County Voters Association stands in the shoes of its volunteers for associational standing purposes. As such, as Director of the Shelby County Voters Association, I can represent that the organization has at least one volunteer in each of the aforementioned districts.

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

Executed in Memphis, Tennessee on 4th day of June, 2026.

A handwritten signature in black ink, consisting of stylized cursive letters, is written over a horizontal line. To the right of the signature, there is a circular stamp containing the number '12'.

Ian Randolph, Director,
Shelby County Voters Alliance