

No. 19-60133

**UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

JOSEPH THOMAS; VERNON AYERS; MELVIN LAWSON,

Plaintiffs – Appellees

v.

PHIL BRYANT, GOVERNOR OF THE STATE OF MISSISSIPPI; DELBERT
HOSEMAN, SECRETARY OF STATE OF THE STATE OF MISSISSIPPI;
JIM HOOD, ATTORNEY GENERAL OF THE STATE OF MISSISSIPPI, ALL
IN THE OFFICIAL CAPACITIES OF THEIR OWN OFFICES AND IN THEIR
OFFICIAL CAPACITIES AS MEMBERS OF THE STATE BOARD OF
ELECTIONS COMMISSIONERS,

Defendants – Appellants

On Appeal from the United States District Court for the Southern District of
Mississippi; USDC No. 3:18-cv-00441-CWR-FKB

PETITION FOR HEARING EN BANC

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CERTIFICATE OF INTERESTED PARTIES

The undersigned counsel of record for Appellants Governor Phil Bryant and Secretary of State Delbert Hosemann certifies that the following listed persons and entities as described in the fourth sentence of Rule 28.2.1 have an interest in the outcome of this case. These representations are made in order that the judges of this Court may evaluate possible disqualification or recusal.

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I hereby certify that to the best of my knowledge and belief, these are the only persons having an interest in the outcome of this appeal.

s/ Tommie S. Cardin

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FEDERAL RULE 35(B)(1) STATEMENT

This proceeding involves one or more questions of exceptional importance as to which a panel of this Court has divided. *See Thomas v. Bryant*, 2019 WL 1306304 (5th Cir. March 22, 2019). Accordingly, the following questions of exceptional importance merit *en banc* review:

1. Whether 28 U.S.C. § 2284(a) is jurisdictional and mandates that an action challenging the apportionment of a state legislative district under the Voting Rights Act must be heard by a three-judge panel?
2. Whether the doctrine of laches should apply to require that any challenge to state legislative district under the Voting Rights Act be barred when a) it is brought too late to allow an orderly process of judicial review and legislative response, and b) there was reason to know of the cause of action in time to file a suit to which such a review and response would have been possible?
3. Whether a single majority-minority district is subject to challenge under §2 of the Voting Rights Act?
4. Whether the district court erred as a matter of law by imposing a remedy without (a) affording to the legislature reasonable opportunity to act, and (b) conducting a remedial hearing and making specific findings of fact?

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STATEMENT OF THE ISSUES MERITING EN BANC CONSIDERATION

1. Whether 28 U.S.C. § 2284(a) is jurisdictional and mandates that an action challenging the apportionment of a state legislative district under the Voting Rights Act must be heard by a three-judge panel?
2. Whether the doctrine of laches should apply to require that any challenge to state legislative district under the Voting Rights Act be barred when (a) it is brought too late to allow an orderly process of judicial review and legislative response, and (b) there was reason to know of the cause of action in time to file a suit to which such a review and response would have been possible?
3. Whether a single majority-minority district is subject to challenge under §2 of the Voting Rights Act?
4. Whether the district court erred as a matter of law by imposing a remedy without (a) affording to the legislature a reasonable opportunity to act, and (b) conducting a remedial hearing and making specific findings of fact?

**STATEMENT OF THE COURSE OF PROCEEDINGS
AND DISPOSITION OF THE CASE**

Plaintiffs-Appellees Thomas, Lawson and Ayers filed suit on July 9, 2018 followed by a First Amended Complaint filed on July 25, 2018. Ex. 9. Although plaintiffs sought expedited consideration on August 30, 2018, to which all Defendants-Appellants promptly objected, the district court did not grant the motion until November 16, 2018. The court set a trial date of February 6, 2019 with a compressed period of time for discovery. This schedule was against the backdrop of a candidate qualifying period starting January 2, 2019 and running until March 1, 2019, and a legislative session beginning January 8, 2019 and concluding on March 29, 2019.

After a two-day trial ending on February 7, 2019, the district court issued an order on February 13, 2019, which held that Senate District 22 (“SD22”) violated Section 2 of the Voting Rights Act for reasons that would be explained later and invited the legislature to consider a political solution. Ex. 11. On February 16, 2019, the court issued its Memorandum Opinion and Order finding liability and rejecting appellants’ affirmative defense of laches.¹ Ex. 12. On February 25, 2019, the district court notified the parties that that it wanted the legislature, a nonparty to the action, to respond by noon on February 26, 2019 regarding the status of

¹ In response, Governor Bryant and Secretary Hosemann filed a first notice of appeal to this Court and a first motion to stay with the district court. The district court denied this first motion to stay prior to the final judgment being rendered and this Court held that it lacked jurisdiction to consider the first appeal as the issues were rendered moot once final judgment issued.

redrawing SD22. Ex. 13. Prior to the deadline, appellants advised the district court that the legislature desired the opportunity to enact a new redistricting plan for SD22 should the stay motions then pending before the district court and this Court be denied. Ex. 14, 2-3. Appellants also asserted their right to be heard on any remedy the district court may order. *Id.*

However, less than three hours later on February 26, 2019, without either providing to the legislature a reasonable opportunity to act, or affording to appellants their requested right to be heard, the district court imposed a judicial remedy. Specifically, the district court ordered into effect a plan that plaintiffs had introduced at trial, Ex. 3, and extended to March 15, 2019, the qualifying deadline for the two districts affected—Districts 22 and 23. Ex. 15. The district court entered final judgment minutes later. Ex. 16.

On February 27, 2019, Governor Bryant and Secretary Hosemann filed a notice of appeal from the final judgment and moved again for a stay the next day in the district court. Ex. 17. The district court denied the stay request on March 6, 2019. Ex. 18. Appellants then sought a stay once more in this Court. On March 15, 2019, a divided panel of this Court granted in part and denied in part the stay motion on the grounds that the district court did not afford the legislature an opportunity to fashion a remedy for the Section 2 violation.² The panel enforced

² The panel issued its written opinion on March 22, 2019. *Thomas*, 2019 WL 1306304.

the stay for this purpose until April 3, and extended the qualifying deadline for candidate in any affected districts until April 12.

In response, on March 27, 2019, the Mississippi Legislature adopted a plan redrawing SD22 and affecting only one other district, District 13. The legislation adopting the plan states that it shall stand repealed and the original plan adopted by the legislature shall be effective if appellants are successful in their appeal. Ex. 20.

STATEMENT OF NECESSARY FACTS

Although plaintiffs complain about a 2012 redistricting plan and a failed 2015 election attempt, they did not file suit until July 9, 2018 and amended the complaint on July 25, 2018. Ex. 9. Before 2012, SD22 contained a BVAP (“Black Voting-Age Population”) of 49.8%. Ex. 4. In 2012, the legislature redrew the district and raised the BVAP to 50.77%. Ex. 6. DOJ precleared the plan on September 14, 2012, over objections from one of the plaintiffs, Joseph Thomas. Exs. 5; 8.

In the only election ever held in SD22, the white Republican incumbent, Eugene Clarke, Chairman of the Senate Appropriations Committee, defeated former Senator Joseph Thomas, a black Democrat. Ex. 12, 16. Those returns are indisputably wrong because of serious errors in Bolivar County, where 654 voters who lived in other Senate districts cast votes in SD22, and 1,508 voters in SD22 were recorded as voting in other districts. Ex. 2, 4.

Instead of bringing suit in 2012 when the plan was adopted and precleared or after the 2015 election, Thomas, along with two other plaintiffs who reside in SD22 and are long-time registered voters, waited almost three additional years to claim that the boundaries of SD22 violate § 2(b) of the Voting Rights Act, 52 U.S.C. § 10301(b).

ARGUMENT AND AUTHORITIES

I. Three-Judge Panel

This Court should grant a hearing *en banc* to settle a jurisdictional issue concerning the requirement of a three-judge panel. 28 U.S.C. § 2284(a) provides:

A district court of three judges shall be convened when otherwise required by Act of Congress, or when an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body.

This statute is jurisdictional. *See Kalson v. Patterson*, 542 F.3d 281, 287 (2nd Cir. 2008); *Armour v. Ohio*, 925 F.2d 987, 988-89 (6th Cir. 1991)(*en banc*); *LULAC of Texas v. Texas*, 318 F. App'x 261, 264 (5th Cir. 2009) (*per curiam*). Moreover, this lawsuit is indisputably an action challenging the apportionment of a statewide legislative body. Employing the “series – qualifier” canon of construction explained by the late Justice Scalia and Bryan Garner in their book “Reading Law”, the plain language of the statute requires the empaneling of a three-judge court in this case due to the placement of a determiner (“the”) cutting off the

continued application of “constitutionality” to the second phrase. *See Antonin Scalia & Bryan A. Garner, Reading Law: The Interpretation of Legal Texts*, 147, 148-49 (2012). The district court misapplied this canon of construction in its analysis and erred as a matter of law in by failing to convene a three-judge court to hear this case. Ex. 10.

If Congress had intended to limit the jurisdictional requirement of a three-judge panel to only constitutional challenges to the apportionment of statewide legislative bodies, there would have been much clearer ways to do so, as Judge Clement illustrated in her panel dissent. *See Thomas*, 2019 WL 1306304, *17. No such limitation is supported by the plain text of the statute.

Even conceding ambiguity in the language of Section 2284(a), a resort to legislative history is appropriate. *United States v. Kay*, 359 F.3d 738, 743 (5th Cir. 2004). And, that history is clear: “[T]he Committee explained that ‘three-judge courts would be retained . . . in any case involving congressional apportionment or the reapportionment of any statewide legislative body.’” S. Rep. 94-204, 94th Cong. 2d Sess. 1976 at 1, 1976 U.S.C.C.A.N. 1988. Congress believed that every statutory method of challenging any apportionment likewise required three-judge courts. The statute can be so read, and it should be so enforced.

II. Relief Barred by Laches

En banc review is necessary to set a clear standard that laches should bar late-hour redistricting actions, like the one brought by plaintiffs. The doctrine of laches may apply to a proceeding under the Voting Rights Act. The Fourth Circuit squarely so held in *White v. Daniel*, 909 F.2d 99 (4th Cir. 1990), when it found the district court had abused its discretion by denying a motion to dismiss based on laches. Any notion that laches is unavailable as a defense in the reapportionment context due to the ongoing violation theory “is contrary to well settled reapportionment and laches case law.” *Fouts v. Harris*, 88 F. Supp. 2d 1352, 1354 (S.D. Fla.1999), *aff’d*, 529 U.S. 1084 (2000); *see also Arizona Minority Coalition for Fair Redistricting v. Arizona Ind. Redistricting Comm’n*, 366 F. Supp. 2d 887 (D. Ariz. 2005); *Maxwell v. Foster*, 1999 WL 33507675 (W.D. La. Nov. 24, 1999); *Lopez v. Hale County, Texas*, 797 F. Supp. 547 (N.D. Texas 1992) (Smith, J. for three judge court), *aff’d* 506 U.S. 1042 (1993).

If this suit had been brought after 2012 or in 2015, when all the facts necessary to plaintiffs’ case were unquestionably known, orderly review and orderly deliberation could have taken place. That would even have been the case if the suit had been brought in 2016 or in 2017. But it was not. Instead it was brought in mid-2018 and produced the unseemly spectacle before us now. *See Reynolds v. Sims*, 377 U.S. 533, 585 (1964) (courts should avoid “requiring

precipitate changes that could make unreasonable or embarrassing demands on a State in adjusting to the requirements of the court's decree.”)

In measuring delay, the legal standard is that the cause of action accrues, and the delay begins, when plaintiff either knows or reasonably should have known of the cause of action. *White*, 909 F.2d at 99; *Arizona Minority*, 366 F. Supp. 2d at 908; *Fouts*, 88 F. Supp. 2d at 1354 (ignorance no excuse); see *Elvis Presley Enters. v. Capece*, 141 F.3d 180, 205 (5th Cir. 1998). The district court, and the panel, erred as a matter of law in failing to apply this standard and, instead, looked to whether there was evidence that each plaintiff subjectively knew of the cause of action.

In 2012, Plaintiff Thomas actively opposed the boundaries of SD22 with the DOJ when J.R. No. 201 was under consideration for preclearance. Ex. 8. As to the other plaintiffs, Plaintiff Lawson testified at trial that he has been a registered voter since he was 18 and that he actively engaged in numerous area political campaigns, including campaigns for Thomas and Representative Bennie Thompson. Ex. 19, 121, 127-28. And, finally, the only evidence in the record concerning plaintiff Ayers' is a stipulation that Ayers has been a registered and active voter in SD22 and the surrounding area. Ex. 19, 16.

There is no doubt that, if not in 2012, then by the time of the 2015 election, any reasonable person would have known of the present cause of action. The facts

on which the district court relied to find a violation all existed as of 2015. For this reason, the length of delay in this case is at least three years, if not more, and the district court clearly erred in believing there was no proof of delay at all. *See Arizona Minority*, 366 F. Supp. 2d at 908 (two-year delay in raising claim inexcusable).

Next, there is no excuse for the three-year delay. None of the plaintiffs have offered any evidence to the contrary. At the latest, all of the necessary facts were in place as of November 2015, but no suit was filed until July 2018, six months before the 90-day legislative session was to begin, eight months before the filing deadline for the Senate elections, and all on the eve of the 2020 census.³

Finally, there is manifest prejudice in addition to the electoral embarrassment noted by Judge Clement in her dissent. *Thomas*, 2019 WL 1306304, *15-16. That embarrassment – suit filed eight months before a filing deadline that could not be heard by the district court until a month before that deadline – is echoed in the facts of other decisions in which applied the laches doctrine to suits filed a short time before filing deadlines. *See White*, 909 F.2d at 103 (collecting cases); *Arizona Minority*, 366 F. Supp. 2d at 909 (citing cases

³ Recently, a district court in Alabama applied laches to bar injunctive relief on a Section 2 challenge to congressional districts drawn in 2011 with the next round of elections occurring in 2020. Mississippi's next round of elections is currently underway. *Chestnut v. Merrill*, 2019 WL 1376480 (N.D. Ala. March 27, 2019).

applying laches when suit filed 13 weeks before filing deadline, or two days before filing began, or “just weeks” before critical deadlines).

The defendants suffered prejudice in their ability to try the case. For example, it was only three days before trial that they were given plaintiffs’ expert analysis – done almost a year before – which showed that 2,000 voters in 2015 mistakenly voted outside the district. Ex. 2. And the need to rely on eight-year-old census data is a recognized source of prejudice in cases like this one. *See White*, 909 F.2d at 103-04 (using old census data which might be inaccurate caused prejudice: “a challenge to a reapportionment plan close to the time of a new census, which may require reapportionment, is not favored.”).

The delay also prejudiced the legislature, which is now required to redraw the district twice within the period of a few years. *Maxwell*, 1999 WL 33507675 at *4 (reapportionment “on the cusp of a constitutionally required legislative reapportionment” is prejudicial). Recognizing the problem the delay created, the district court took the unusual step of announcing that the existing district was illegal without stating why. Ex. 11. A few days later it explained its ruling. Ex. 12. The next week, without warning, it gave the legislature – not even a defendant – one day to comply, and at the end of that day put its own plan in place. Ex. 13. These unusual procedures were themselves a marker of the fact that this suit was

filed too late. And the legislature will have to do this all over again after the 2020 census.

This Court was then forced to hear not one, but two, emergency stays, in which a panel was forced to write 46 pages of opinion within seven (7) days. It did so without the benefit of oral argument on important statutory and public policy issues that no doubt would have merited argument had time been available. And then the legislature interrupted the waning days of its session to remedy the most obvious injustice of the court's plan, which effectively cut out the Republican candidates who had previously qualified to run in the district. They are now back in.

An *en banc* hearing is requested so this Court can send a message to those who bring cases of this type that, absent some serious impediment, these cases should be brought at a time that will allow the ordinary processes of court and legislature to work.

III. No Section 2 Violation

A hearing *en banc* is necessary because plaintiffs ask this Court to plow new ground in finding a Section 2 violation in a single, single-member district that is already a majority-minority district. Judge Clement captured the novelty of this approach in her dissent to the panel denial of the stay motion: "No court has ever found that a majority-minority single-member district violates Section 2 by itself."

Thomas, 2019 WL 1306304, *14. This is so because the Supreme Court has instructed in *Shaw v. Hunt* that “a plaintiff may allege a Section 2 violation in a single-member district if the manipulation of districting lines fragments politically cohesive minority voters among several districts or packs them into one district or a small number of districts, and thereby dilutes the voting strength of members of the minority population.” *Shaw*, 517 U. S. 899, 914 (1996). Stated differently, a state can violate Section 2 by “cracking” minority voters into separate districts, or “packing” minority voters into supermajority districts. Plaintiffs have failed to even allege, much less offer any proof, to establish fragmentation through either “cracking” or “packing.” Simply stated, Section 2 does not guarantee minority voters in any single district a minimum voting majority to enable them to prevail on election day. Having misread the governing law on this issue, the district court committed reversible error. *See Johnson v. DeGrandy*, 512 U.S. 997, 1022 (1994).

As demonstrated in the district court, on appeal, plaintiffs will argue that SD22, even considered in isolation, violates Section 2. Isolating a single majority-minority district and attempting to analyze it in terms of Section 2 to the exclusion of what is taking place around it is folly. It was undisputed at trial that SD22 was 50.77% BVAP. Plaintiffs offered no evidence of fragmentation of minority voters through either “cracking” or “packing”. In fact, defendants offered the only

evidence of fragmentation when plaintiffs offered an illustrative plan as a remedy. *See* Exs. 3; 19, 237-240.

In addition to there being no proof of fragmentation necessary to establish a Section 2 claim, the actual proof offered by plaintiffs was insufficient to establish depressed minority voter participation in SD22. Plaintiffs relied on a single election that occurred within the existing boundaries of SD22 to support their claim. At trial, the evidence demonstrated that the election results in that election were, in the words of plaintiffs' expert, flawed due to a "significant election administration error" occurring in Bolivar County. Ex. 19, 80. Plaintiffs' expert did not adjust those results using reconstituted election analysis, as described in *Rodriguez v. Bexar County*, 385 F. 3d 853, 861 (5th Cir. 2004). His defective analysis of a single election in SD22 cannot possibly be enough to carry the plaintiffs' burden of demonstrating depressed black participation. This Court found a single election insufficient to prove depressed participation in *Rangel v. Morales*, 8 F.3d 242 (5th Cir. 1993). As a result, district courts in this Circuit have applied *Rangel* to reject Section 2 claims. *Hall v. Louisiana*, 108 F. Supp. 3d 419, 422 (M.D. La. 2015); *York v. City of Gabriel*, 89 F. Supp. 3d 843, 857-58 (M. D. La. 2015).

Neither can reliance on plaintiffs' expert's turnout analysis versus the turnout statistics of the U.S. Census Bureau carry their burden. Ex. 1. The Census

Bureau statistics offered at trial demonstrated that black voter turnout generally exceeds white voter turnout. Ex. 7, 3 (Table 1). Census Bureau statistics are usually dispositive as demonstrated by the very authorities cited by the plaintiffs in other court filings. *See Mo. St. Conf. of the NAACP v. Ferguson-Florissant Sch. Dist.*, 894 F.3d 924, 932-33 (8th Cir. 2018). Even assuming plaintiffs get past the specter of a Section 2 claim grounded in an existing majority-minority district, the district court committed clear error by relying on a single, unreliable election result to support a finding of a Section 2 violation.

IV. Failure to Afford Legislative Remedy

Finally, *en banc* consideration is necessary to correct the district court's disregard for the branch of state government responsible for redistricting. The district court, after finding a Section 2 violation, failed to afford the legislature a reasonable opportunity to adopt a remedial measure before deciding to impose one itself. Fifth Circuit authority definitively expresses a preference for a legislative remedy when practicable rather than a federal court imposing one. *See Veasey v Abbott*, 830 F.3d 216, 270 (5th Cir. 2016)(*en banc*). This approach is grounded in the proposition that a federal court's review of districting legislation "represents a serious intrusion on the most local of functions." *Miller v. Johnson*, 515 U. S. 900, 915 (1995).

Moreover, the district court imposed a judicial remedy without conducting a

remedial hearing, and its remedy is not supported by any factual findings. Specifically, the district court selected one of three proposed plans submitted by plaintiffs without providing any reasoning for its choice--including addressing the court-sanctioned “cracking” of minority votes in neighboring Senate District 23 that results from the court imposed plan. With all respect, altering district boundaries during a qualifying period with no remedial hearing afforded to the parties is an unprecedented act with no case law to support it.

Besides this unprecedented approach, the district court also imposed a redistricting plan which inexplicably and dramatically increased the BVAP of one district while sharply reducing the BVAP in an adjacent district. Offering no legitimate reason for taking this approach, the result was to eliminate all Republican opposition for Plaintiff Thomas who had qualified to run as a Democrat in SD22. Interfering with the ongoing election preparation in an established election process is the very effect discouraged by the Supreme Court. *See Reynolds*, 377 U.S. at 585 (courts may refuse to grant immediate relief in a legislative apportionment case even when apportionment found illegal under certain circumstances such as when election machinery in progress for upcoming election); *Veasey v. Perry*, 769 F. 3d 890, 892 (5th Cir. 2014) (courts should carefully consider importance of maintaining status quo on eve of election).

While the panel’s entry of stay gave the Mississippi Legislature an

opportunity to alter SD22, it only had scant time remaining in the legislative session to do so. Nevertheless, the legislature adopted the best alternative in the time available and reserved the right to enforce the original district boundaries in the event appellants are successful in this appeal.

CONCLUSION

For the reasons stated above, Governor Bryant and Secretary Hosemann request a hearing *en banc*.

This the 8th day of April, 2019.

Respectfully submitted,

s/ Tommie S. Cardin

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SECRETARY OF STATE OF THE STATE
OF MISSISSIPPI

CERTIFICATE OF SERVICE

I, Tommie S. Cardin, hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification to all counsel of record.

This the 8th day of April, 2019.

s/ Tommie S. Cardin
TOMMIE S. CARDIN

CERTIFICATE OF COMPLIANCE

1. This petition complies with the type-volume limitation of Federal Rule of Appellate Procedure 35(b)(2)(A) because it contains **3882** words, as determined by the word-count function of Microsoft Word 2010, excluding the parts of the petition exempted by Federal Rule of Appellate Procedure 32(f) and Fifth Circuit Rule 32.2.

2. This brief complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word 2010 in 14-point Times Roman font.

s/ Tommie S. Cardin

TOMMIE S. Cardin

COPY OF OPINION SOUGHT TO BE REVIEWED

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

MEMORANDUM OPINION AND ORDER

In July 2018, plaintiffs Joseph Thomas, Vernon Ayers, and Melvin Lawson filed this suit alleging that the boundaries of Mississippi Senate District 22 violate § 2 of the Voting Rights Act. Defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann deny the allegation and dispute that any violation can be remedied in time for the 2019 election. The parties presented evidence at trial on February 6 and 7, 2019.¹

On February 13, after a thorough review of the evidence and arguments, the Court advised the parties and the Mississippi Legislature that the plaintiffs had proven their case. The Legislature was invited to redraw District 22 prior to consideration of any judicial remedy. The Court's findings of fact and conclusions of law are presented below.

I. Factual and Procedural History

A. The Parties

Plaintiff Joseph Thomas is a native of Yazoo City, Mississippi. He is a banker by profession, a community advocate by avocation, and in his spare time, a published historian of African-Americans in Yazoo City and Mississippi.²

¹ Discovery was completed on an expedited basis. *See* Docket No. 28. The trial was held at the first opportunity after accounting for the attorneys' conflicts and the Court's firm trial settings. At the hearing on the defendants' dispositive motion, defense counsel recognized that all have worked as expeditiously as possible.

² *See* Joseph C. Thomas, *Afro-American Sons & Daughters 1849-1949* (1997).

In 2003, Thomas turned his attention to public office. He ran for and won election as Mississippi State Senator for District 21. The District included Thomas's part of Yazoo County and predominantly African-American portions of Madison County, among other places, so its "Black Voting Age Population" (BVAP) was relatively high. He ran again in 2007 but lost in the primary to another African-American candidate. Thomas then sat out the 2011 cycle.

The decennial redistricting process resulted in changes to the Senate map in 2012. Thomas's residence wound up in District 22.

Thomas learned that District 22 now extended into areas of Madison and Bolivar Counties that ultimately led it to have a BVAP of only 50.8%. He was concerned that although technically a majority, such a low BVAP would negatively impact African-Americans' ability to elect their candidate of choice. After all, in District 22, African-Americans' candidate of choice had lost in the 2003, 2007, and 2011 elections.

Thomas contacted the U.S. Department of Justice and urged it to reject the new boundaries. He was not successful. DOJ precleared the plan in September 2012.

In 2015, Thomas decided to throw his hat in the ring. He ran in District 22 against Eugene "Buck" Clarke, the incumbent chairman of the Senate Appropriations Committee. Thomas thought it would be an uphill battle, but "ran hard" and spent "quite a bit" of his own money, he testified. He lost 54% to 46%. Thomas says he was "real disappointed" that his outreach to the majority-white precincts in Madison and Bolivar Counties had not garnered more votes.

Thomas did not file a Voting Rights Act lawsuit in 2015, 2016, or 2017. He testified that he was unaware that an individual could file a § 2 suit until he had a conversation with one of the attorneys in this case in summer 2018. This suit was filed several weeks later.

Plaintiff Melvin Lawson is also a voter in District 22. He has worked and volunteered for political campaigns, including his brother's campaign for Bolivar County Supervisor and Thomas's Senate campaign. Through this experience Lawson found that it is more difficult to get Delta voters to the polls in odd-numbered election years, *i.e.*, years without Congressional and Presidential races, because in odd-numbered years there are fewer transportation options available on Election Day.

In 2018, Lawson overheard concerned citizens talking about District 22. Weeks later he ran into attorney Ellis Turnage, co-counsel for the plaintiffs in this action, who told him about this suit. Lawson was interested and joined as a plaintiff.

We know little about plaintiff Vernon Ayers other than this: he is a registered voter in District 22. Neither side has elaborated on his situation.

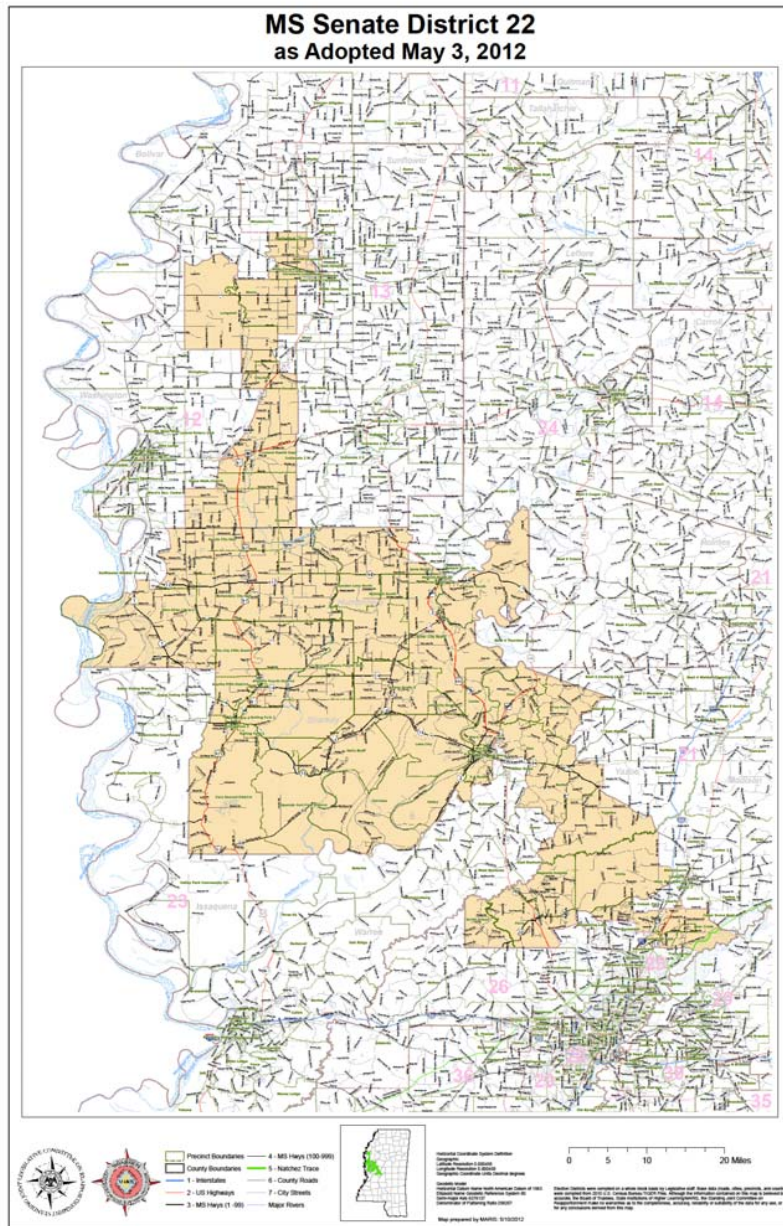
Each plaintiff is African-American.

Defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann constitute the State Board of Election Commissioners.³ All three are sued in their official capacities.

B. District 22

District 22 is the second-largest Senate District in Mississippi, encompassing 2,166 square miles and spanning more than 100 miles from tip to toe. It begins in Bolivar County, runs through Washington, Humphreys, Sharkey, and Yazoo Counties, and finds its end in Madison County. The District looks like this:

³ See Miss. Code Ann. § 23-15-211.

SENATE DISTRICT 22

Most of District 22 lies in the heart of the Mississippi Delta, the unique alluvial plain occupying the northwest quadrant of the state. The Delta is impossible to completely define, but my colleagues' description from 1982 is a good start:

The Mississippi Delta consists of 19 Delta and part-Delta contiguous counties as follows: Bolivar, Carroll, Coahoma, DeSoto, Grenada, Holmes, Humphreys,

Issaquena, Leflore, Panola, Quitman, Sharkey, Sunflower, Tallahatchie, Tate, Tunica, Warren, Washington, and Yazoo. This is a distinct geographical area of the state traditionally featuring an agricultural economy concerned with flood control of the Mississippi River. The geography of the Delta has been colorfully and somewhat accurately described as “beginning in the lobby of the Peabody Hotel at Memphis, Tennessee, and ending at Catfish Row in Vicksburg, Mississippi.” Since early times, concentrations of blacks have resided in the Delta area.⁴

John Dittmer calls the Delta “both a clearly defined geographical area and a state of mind.”⁵ The benefits of “some of the richest soil in the nation” were shared unequally: the land was worked by “tens of thousands of poor black families” for the benefit of “a relatively small number of white[]” landowners.⁶ The Delta was “a place of appalling poverty for the blacks who tilled the land.”⁷

As Mississippi has changed over the years, it remains true that “[b]lacks in Mississippi, especially in its Delta region, generally have less education, lower incomes, and more menial occupations than whites.”⁸ Updated socio-economic data for District 22 will be discussed below.

The plaintiffs introduced evidence confirming that the Delta is “totally different” from Madison County. Lawson agreed that the differences are geographical and cultural. The Delta is rural, agrarian, and contains “the largest concentration of black voting age population” in Mississippi.⁹ Madison County is populous and suburban, bordering the State’s Capitol City, Jackson.

The Madison County precincts situated in District 22, such as the Gluckstadt area, are especially different. A prior redistricting court designated them as a “high-growth area” of the State.¹⁰ Cotton and soybeans are growing in the Delta. The population is not.

⁴ *Jordan v. Winter*, 541 F. Supp. 1135, 1139 n.1 (N.D. Miss. 1982) (three-judge court).

⁵ John Dittmer, *Local People: The Struggle for Civil Rights in Mississippi* 10 (1994).

⁶ *Id.*

⁷ Yasuhiro Katagiri, *The Mississippi State Sovereignty Commission: Civil Rights and States’ Rights* 39 (2001).

⁸ *Jordan v. Winter*, 604 F. Supp. 807, 812 (N.D. Miss. 1984) (three-judge court).

⁹ *Smith v. Clark*, 189 F. Supp. 2d 529, 543 (S.D. Miss. 2002) (three-judge court).

¹⁰ *Id.* at 544.

In the 2015 election, Thomas won the predominately African-American precincts in Washington, Sharkey, Humphreys, and Yazoo Counties. He lost the predominantly white precincts in Madison and Bolivar Counties.

C. The Experts

1. The Plaintiffs' Experts

The plaintiffs called two experts to testify at trial. Both were qualified by education and experience to give expert opinions in their respective fields, and have previously provided expert testimony in voting cases.

First to testify was Dr. Maxwell Palmer, a political scientist at Boston University. Dr. Palmer analyzed District 22's voting patterns with a technique called "ecological inference" (EI).

At heart, EI "is the process of extracting clues about individual behavior from information reported at the group or aggregate level."¹¹ It is useful in voting cases because "the secret ballot hinders the [research] process and surveys in racially polarized contexts are known to be of little value."¹² EI "estimates the underlying propensity of each group to turn out for an election and to vote for a particular candidate using the estimation technique of maximum likelihood."¹³ The process is generally accepted in voting cases in this Circuit.¹⁴

Dr. Palmer testified that EI is a superior statistical method to use in this case. He said that among other benefits, EI allowed him to run 100,000 simulations of each election in the sample, and provided valuable statistical checks, such as confidence intervals, on the results.

¹¹ Gary King et al., *Ecological Inference: New Methodological Strategies* 1 (2004).

¹² *Id.*

¹³ *Rodriguez v. Harris Cty., Tex.*, 964 F. Supp. 2d 686, 759 (S.D. Tex. 2013).

¹⁴ *E.g., Benavidez v. City of Irving, Tex.*, 638 F. Supp. 2d 709, 725, 731-32 (N.D. Tex. 2009); *Hall v. Louisiana*, 108 F. Supp. 3d 419, 433 (M.D. La. 2015) ("Experts from both Plaintiffs and Defendants employed the widely recognized Ecological Inference procedure developed by Dr. Gary King to derive their conclusions of voter preferences in this case.").

Dr. Palmer used precinct-level voting and Census data to analyze 10 elections in District 22. They consist of the 2003, 2007, and 2015 Senate District 22 elections (*i.e.*, the “endogenous” elections most relevant to this case), as well as the 2003 Lieutenant Governor and Treasurer elections, the 2007 Insurance Commissioner election, the 2011 Governor election, and the 2015 Agriculture Commissioner, Secretary of State, and Governor elections (*i.e.*, the “exogenous” elections with some relevance to this case).¹⁵ All 10 featured contests between white and black candidates. The goal of the endogenous/exogenous comparison was to see if findings were consistent between the Senate races and statewide races also held in odd years in District 22.

This analysis led Dr. Palmer to present the following conclusions:

First, there is “strong evidence” that African-American voters in District 22 are politically cohesive, but that their candidates of choice are defeated by white bloc voting. Every African-American candidate lost in the 10 elections in the sample, for example.¹⁶ Dr. Palmer also found that African-American and white voters in the District are highly racially polarized.¹⁷ In the 2015 State Senate race, 92.8% of African-American voters chose Thomas, while only 11.4% of white voters did the same.

Second, there is a sizable turnout gap between African-American and white voters in District 22.¹⁸ On average, white turnout is 10.2 percentage points higher than black turnout. This conclusion was statistically significant in three out of the four Senate District 22 races analyzed.

¹⁵ The 2011 Senate race in District 22 was between two white candidates. Dr. Palmer found that 83% of African-American voters supported the Democrat and 84% of white voters supported the Republican. The Democrat lost.

¹⁶ Among the endogenous elections, Thomas’s 46% result in 2015 made him the highest-performing African-American candidate. Looking at the exogenous elections, Gary Anderson was the most popular African-American candidate in District 22; he earned 49.1% of the District’s vote in the 2003 Treasurer race and 49% of the District’s vote in the 2007 Insurance Commissioner election.

¹⁷ This finding is statistically significant.

¹⁸ The turnout analysis included the 2011 Senate District 22 election.

Third, African-Americans would have a “realistic opportunity” to elect their candidate of choice if the BVAP in District 22 was increased to 62%.

On cross-examination it became clear that the plaintiffs did not ask Dr. Palmer to determine whether a BVAP lower than 62% would be sufficient to elect the African-American community’s candidate of choice; rather, the plaintiffs asked him to analyze the expected outcome of a 62% BVAP. Dr. Palmer’s report states that the 62% threshold was derived from the map constructed by the plaintiffs’ expert mapmaker. We turn now to that expert.

William Cooper was the plaintiffs’ second and final expert witness. Cooper uses geographic information system (GIS) technology to create electoral maps.

In this case, the plaintiffs asked Cooper to determine whether District 22’s boundaries could be reconfigured to increase the BVAP while honoring traditional redistricting criteria and minimizing disruption to adjacent Districts. The plaintiffs also asked Cooper to gather relevant socio-economic data for District 22.

Cooper concluded that yes, although African-American voters in District 22 are already sufficiently numerous and geographically compact as to constitute a majority, the District could be redrawn to increase the BVAP by at least 10 additional percentage points. He then prepared three maps demonstrating how District 22 could be reconfigured.

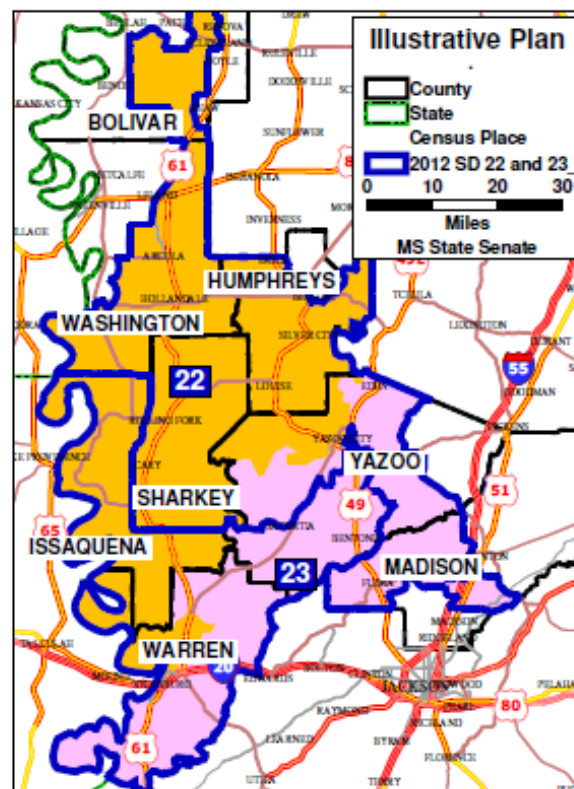
Plan 1 moves the Madison County precincts and eight Yazoo County precincts from District 22 to District 23. In exchange, the Issaquena County precincts and eight Warren County precincts would move in the opposite direction. A total of 28 out of Mississippi’s 1,962 precincts (1.4%) would be shifted. No precinct lines would be redrawn. Approximately 70% of the population of District 22 would remain in District 22, while approximately 67% of the

population of District 23 would stay put. A total of 27,000 voters in these Districts would be affected.

Under Plan 1, the BVAP would rise to 61.98%.

Plan 1 is pasted below. The thick blue lines represent the Districts as currently constituted. The gold and pink areas show how the Districts would change.

PLAINTIFFS' ILLUSTRATIVE PLAN 1



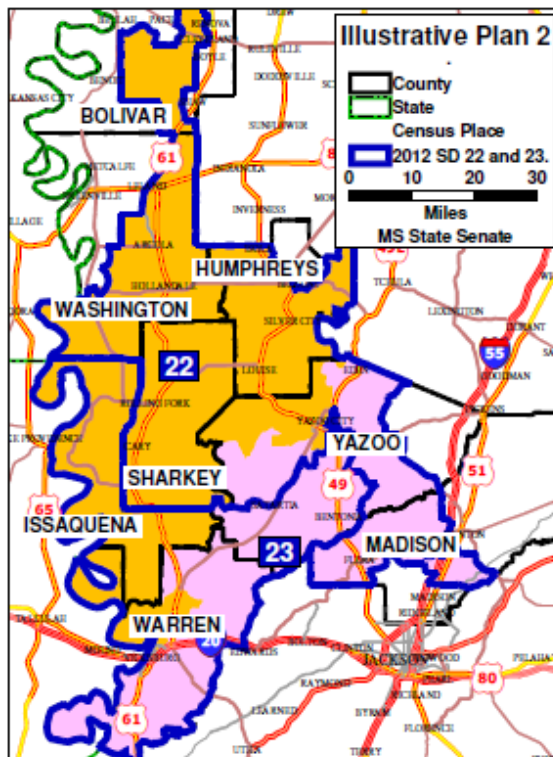
Cooper developed Plans 2 and 3 in response to the defendants' arguments during discovery. The defendants' expert had contended (among other things) that Plan 1 was unwieldy because it would split the City of Vicksburg between Districts 22 and 23. So in Plan 2, Cooper proposed another way to redraw those Districts that, while achieving the goals of Plan 1, would offset the splitting of Vicksburg by reuniting all of Yazoo City into a single District. Plan 2 ends up with a BVAP of 61.3%.

Plan 3 takes that idea one step further. While Vicksburg would again be split, Plan 3 redraws the boundaries to reunite Yazoo City *and* Cleveland, Mississippi—both of which are currently divided—resulting in a net decrease in split cities. The resulting BVAP is 66.1%.

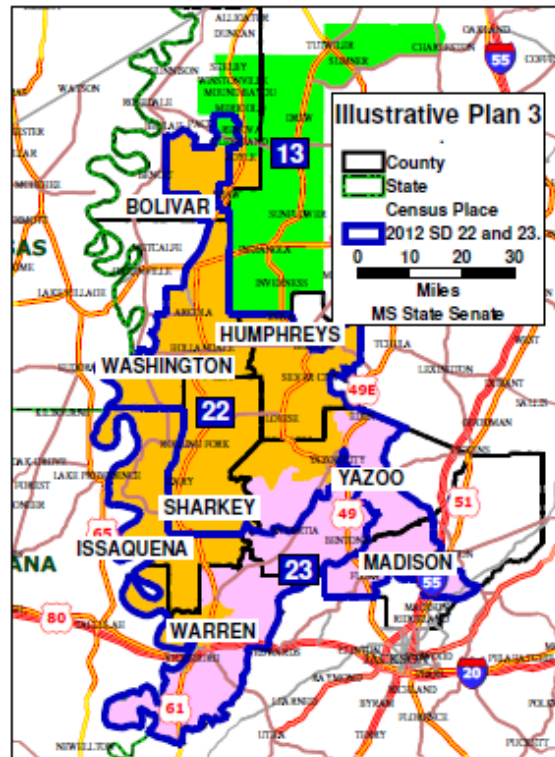
The downside of Plan 3 is that it also involves adjusting the borders of District 13, thereby affecting more counties, precincts, and voters. It essentially presents a trade-off between municipal unification and pre-election disruption.

Plans 2 and 3 are shown below. Again, the thick blue lines represent the Districts as currently constituted, while the gold, pink, and in Plan 3, green areas indicate how the Districts would change.

PLAINTIFFS' ILLUSTRATIVE PLAN 2¹⁹



PLAINTIFFS' ILLUSTRATIVE PLAN 3



¹⁹ At this scale Plans 1 and 2 may look identical, but Plan 2 features a small golden-colored section immediately to the left of the word “YAZOO.”

All of Cooper's illustrative plans satisfy traditional redistricting criteria. They are contiguous, reasonably compact, reasonably shaped, satisfy one-person one-vote, and do not dilute minority voting strength. The incumbent Senator in District 23 remains in the same District. (The incumbent in District 22, Buck Clarke, is not running for reelection although his residence remains in the District.)

"To the extent possible, consistent with the constitutional and statutory requirements, federal redistricting courts attempt to preserve local political boundaries—city and county lines," since those lines often reflect "communities of interest."²⁰

In addition to the communities of interest represented by counties and municipalities, there are other communities of interest which share common concerns with respect to one or more identifiable features such as geography, demography, ethnicity, culture, socio-economic status or trade. The preservation of regional communities of interest within a single district enhances the ability of constituents with similar regional interests to obtain effective representation of those interests.²¹

Cooper testified that Plan 1 better respects communities of interest than the current map. Issaquena County and part of Warren County are more like the other Counties in District 22, he said, while the Madison County precincts are closer in nature to the wealthier parts of Warren County already sited in District 23.

Finally, Cooper reviewed Census data showing a variety of substantial socio-economic disparities between African-Americans and whites in District 22 that likely reduce voter turnout.

The statistics are bleak. The African-American poverty rate in District 22 is nearly five times the white poverty rate. Educational attainment for African-Americans is depressingly low. African-Americans who work full time make a *median* wage of \$20,256 a year, while the median

²⁰ *Smith*, 189 F. Supp. 2d at 542 (citations omitted).

²¹ *Id.* at 543 (quotation marks, citations, and brackets omitted).

white full-time worker makes nearly double—\$40,485.²² These and similar disparities, some of which are reproduced below, reflect two populations that reside alongside each other yet experience vastly different opportunities and outcomes:

SOCIO-ECONOMIC PROFILE OF DISTRICT 22

	<i>African-Americans</i>	<i>Whites</i>
<i>Poverty Rate</i>	41.2%	8.8%
<i>Median Household Income</i>	\$23,741	\$66,736
<i>SNAP Participation</i>	40.3%	4.3%
<i>High School Dropout Rate</i>	28.7%	9.8%
<i>Bachelor's Degree Attainment</i>	14.0%	38.6%
<i>Median Full-time Wage</i>	\$20,256	\$40,485
<i>Adults Without Health Insurance</i>	29.1%	11.5%

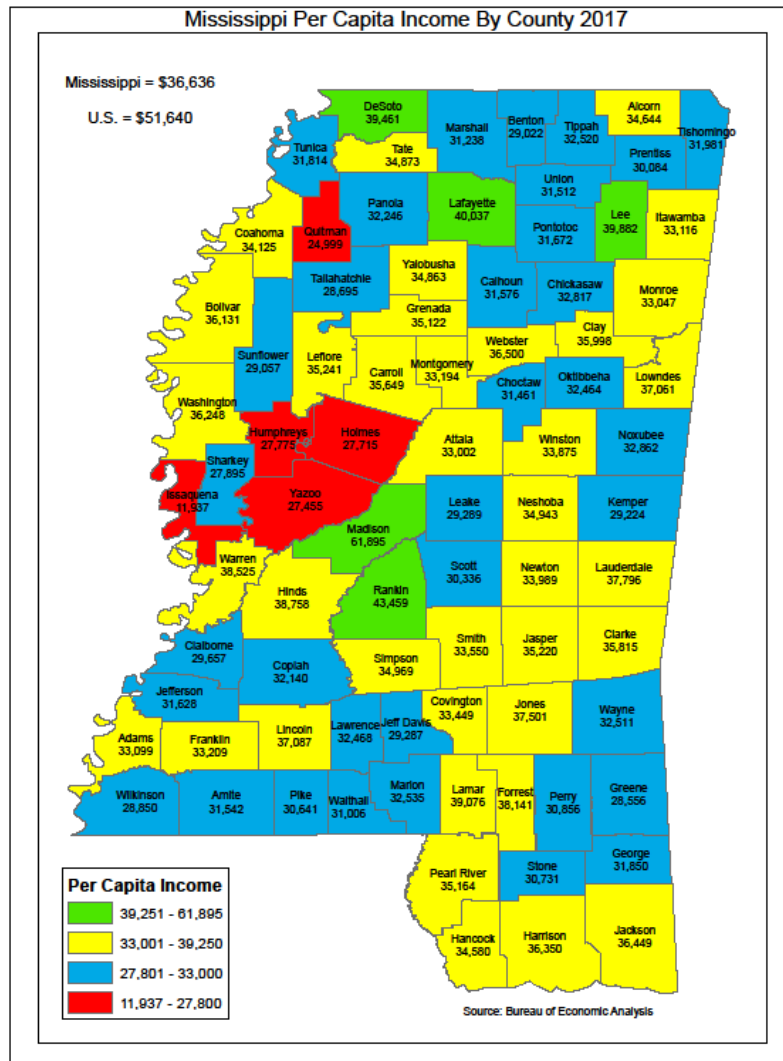
Cooper proceeded to explain that the inclusion of Madison County voters added significantly to these disparities. County-level statistics reveal that Madison County's median household income is more than twice as much as any other County in District 22.²³ In Madison County, for example, the median household brings in \$68,600 annually, a full \$40,000 more than the median household in neighboring Yazoo County (\$28,330). After Madison County, the second-wealthiest County in the District is Sharkey County, with a \$30,033 median household income. Obviously, that is less than half of Madison County's figure.

The Mississippi Department of Employment Security has created a helpful map demonstrating county-level income differences as they existed in 2017. It shows that Madison County had the highest per-capita income that year in all of Mississippi:

²² This means that half of working African-Americans in District 22 make below \$20,256 a year.

²³ The statistics for the Gluckstadt area may be higher than the countywide figures, but they are not in evidence.

PER CAPITA INCOME BY COUNTY



onward, he found “152 separate instances in which a candidate favored by AA voters has been elected to local public office throughout the territory included in” District 22.

In Humphreys County, for example, Dr. Morrison examined the records of the 2007, 2011, and 2015 elections for local offices such as Chancery Clerk, Circuit Clerk, and Sheriff. From those records he identified a sample of 21 elections in which an African-American candidate ran and won. Of those, 14 races were uncontested and 7 were contested.

Dr. Morrison testified that based on this “simple counting operation—that’s what demographers do,” African-Americans are capable of winning elections within District 22. When asked about the possibility of white bloc voting defeating African-American-preferred candidates, he explained that he could not “see how that could possibly be the case” given the number of African-American elected officials. “The numbers speak for themselves.”

Dr. Morrison took issue with Plan 1. He argued that splitting Vicksburg would subordinate traditional redistricting criteria to race. Dr. Morrison also claimed that African-Americans in District 23 would be harmed because their “influential” 42% BVAP would be reduced to 31%. “Overall,” he wrote, “Plaintiffs’ proposed alternative [Plan 1] would strip African-American voters of two districts in which they are now influential.”

Finally, Dr. Morrison gathered Census data about voter turnout in Mississippi. Surveys from even-numbered election years spanning 2004-2016 show that African-Americans self-reported higher turnout rates than white voters. “These data furnish convincing evidence that African Americans in Mississippi have access to the political process and have participated in that process at ever higher rates in recent years,” Dr. Morrison concluded.

D. Stipulations

In case the Court's discussion has inadvertently omitted anything, the parties' stipulations are reproduced here in their entirety:

The Mississippi Senate is composed of 52 members, each of whom is elected from a single-member district. Elections for the Mississippi Legislature are held every four years in odd-numbered years at the same time other elections for most state and local elections are held.

The current plan for the Mississippi Senate was adopted in 2012.²⁴ The first election under it was held in 2015. The next election under it will be held in 2019. Under the current plan for the Mississippi Senate, District 22 consists of all of Sharkey County and parts of Bolivar, Washington, Humphreys, Yazoo, and Madison Counties. Under the current plan, District 22 is 50.77% African American in voting age population using 2010 census data.

Eugene "Buck" Clarke has represented Mississippi State Senate District 22 for approximately 15 years since January 2004. He is white.

In the 2003 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 9,004 votes and defeated African-American candidates Mala Brooks and Mark Crawford, who received 5,288 votes and 1,870 votes, respectively.

In the 2007 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 7,266 votes and defeated African-American candidate Sandra Jaribu Hill, who received 5,116 votes.

²⁴ At trial, the parties clarified that the Mississippi Senate adopted a plan in 2011, but it was not adopted by the Mississippi House and therefore never became final.

In the 2011 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 7,033 votes and defeated white candidate George Hollowell, who received 6,021 votes.

In the 2015 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 8,149 votes and defeated African-American Democratic candidate Joseph Thomas, who received 6,985 votes.

Plaintiff Vernon Ayers is an African-American resident and registered voter in Washington County who votes in District 22.

* * *

At the end of trial, the parties also stipulated that the Mississippi Senate has never had more than 13 African-American members. The defendants argued that this fact, while true, was irrelevant. The objection is overruled. The relevance of this fact will become apparent later.

II. Legal Standard

A state violates § 2 of the Voting Rights Act:

if, based on the totality of circumstances, it is shown that the political processes leading to nomination or election in the State or political subdivision are not equally open to participation by members of a class of citizens protected by subsection (a) in that its members have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.²⁵

“The essence of a § 2 claim is that a certain electoral law, practice, or structure interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by black and white voters to elect their preferred representatives.”²⁶

The plaintiffs must begin by proving the three *Gingles* requirements. First is that “the racial group is sufficiently large and geographically compact to constitute a majority in a single-

²⁵ 52 U.S.C. § 10301(b).

²⁶ *Thornburg v. Gingles*, 478 U.S. 30, 47 (1986).

member district.”²⁷ Second, the plaintiffs must prove that “the racial group is politically cohesive.”²⁸ The third requirement is that “the majority votes sufficiently as a bloc to enable it usually to defeat the minority’s preferred candidate.”²⁹ “[T]he *Gingles* factors cannot be applied mechanically and without regard to the nature of the claim.”³⁰

Courts are then to consider “the Senate factors”:

1. The extent of any history of official discrimination in the state or political subdivision that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process;
2. The extent to which voting in the elections of the state or political subdivision is racially polarized;
3. The extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group;
4. If there is a candidate slating process, whether the members of the minority group have been denied access to that process;
5. The extent to which members of the minority group in the state or political subdivision bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process;
6. Whether political campaigns have been characterized by overt or subtle racial appeals; [and]
7. The extent to which members of the minority group have been elected to public office in the jurisdiction.³¹

The Senate factors are “neither comprehensive nor exclusive,” and “there is no requirement that any particular number of factors be proved, or that a majority of them point one

²⁷ *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006) (quotation marks and citation omitted).

²⁸ *Id.*

²⁹ *Id.* (brackets and ellipses omitted).

³⁰ *Voinovich v. Quilter*, 507 U.S. 146, 158 (1993).

³¹ *Gingles*, 478 U.S. at 36–37 (quotation marks and citations omitted).

way or the other.”³² They simply “provide salient guidance from Congress and the Supreme Court on how to examine the current effects of past and current discrimination and how those effects interact with a challenged law.”³³ The ultimate question continues to be “whether as a result of the challenged practice or structure plaintiffs do not have an equal opportunity to participate in the political processes and to elect candidates of their choice.”³⁴

“The Fifth Circuit has noted that it will be only the very unusual case in which the Plaintiffs can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of the circumstances.”³⁵

III. Discussion³⁶

A. The Board of Election Commissioners

The defendants first contend that they are improper parties because none of them caused or can remedy the boundaries of District 22. Since 1965, however, state redistricting cases in Mississippi have “always been directed primarily against the state executive officers charged with administering Mississippi’s election laws . . . the then members of the State Board of Election Commissioners and their subordinates.”³⁷ That is because although the Board has “no power to create reapportionment,” it does “control the continued election of members to a legislative body found to be unconstitutionally constituted,” and is “the only agency with

³² *Id.* at 45 (quotation marks and citation omitted).

³³ *Veasey v. Abbott*, 830 F.3d 216, 246 (5th Cir. 2016) (en banc).

³⁴ *Gingles*, 478 U.S. at 44 (quotation marks and citation omitted).

³⁵ *Benavidez*, 638 F. Supp. 2d at 713 (quotation marks and citation omitted).

³⁶ Parts III A and B resolve arguments first raised in the defendants’ September 2018 motion for summary judgment.

³⁷ *Connor v. Winter*, 519 F. Supp. 1337, 1340 n.1 (S.D. Miss. 1981) (three-judge court). Our defendants’ argument was actually made by the dissenting Judge in *Connor*. *See id.* at 1346 (Cox, J., dissenting) (“The majority herein has again cast a sovereign state into perilous and turgid waters to first be cast upon the rocky shores of Scylla because they were powerless to make the necessary changes, then only to be thrust into the dark brown vortex of Charybdis, when because of their impotency they are required to pay plaintiffs attorneys’ fees, litigation expenses, and costs.”).

statewide power to prevent the ballot placement of candidates for election to a malapportioned legislature.”³⁸ The defendants’ reply brief is silent on this caselaw. We will move on.

B. Affirmative Defenses

The defendants next argue that the statute of limitations has expired. They contend that this case should have been filed within three years of the Department of Justice’s September 2012 preclearance of the Senate map. Alternatively, the defendants say that laches should end this case because the plaintiffs’ “six-year delay” in bringing this lawsuit is inexcusable and prejudicial.

1. Statute of Limitations

The Court assumes for present purposes that a Voting Rights Act suit “for injunctive relief brought by a private litigant could be barred by the running of an analogous state statute of limitations.”³⁹ Even so, the plaintiffs’ suit is timely because: (1) they filed within three years of the last District 22 election “which improperly implemented” the Act,⁴⁰ and (2) they allege that District 22’s boundaries present a continuing violation of § 2 that will harm them again in the upcoming 2019 election cycle.⁴¹

2. Laches

a. Substantive Law

“Laches is an inexcusable delay on the part of the plaintiff that results in prejudice to the defendant.”⁴² “It assures that old grievances will some day be laid to rest, that litigation will be

³⁸ *Id.* at 1343.

³⁹ *Dotson v. City of Indianola*, 514 F. Supp. 397, 401 (N.D. Miss. 1981) (three-judge court). *But see Jeffers v. Clinton*, 730 F. Supp. 196, 201 n.5 (E.D. Ark. 1989) (three-judge court) (noting that the state defendants presented a laches defense in lieu of a statute of limitations defense).

⁴⁰ *Dotson*, 514 F. Supp. at 401.

⁴¹ *See Blackmoon v. Charles Mix Cty.*, 386 F. Supp. 2d 1108, 1115 (D.S.D. 2005).

⁴² *Radiator Specialty Co. v. Pennzoil-Quaker State Co.*, 207 F. App’x 361, 362 (5th Cir. 2004) (citation omitted).

decided on the basis of evidence that remains reasonably accessible and that those against whom claims are presented will not be unduly prejudiced by delay in asserting them.”⁴³

To succeed with a laches defense, the defendants must show “(1) a delay in asserting a right or claim; (2) that the delay was not excusable; and (3) that there was undue prejudice to the party against whom the claim is asserted.”⁴⁴ “Whether laches bars an action in a given case depends upon the circumstances of that case.”⁴⁵

“Measuring prejudice entails balancing equities.”⁴⁶ “When a district court is making an equity determination such as laches, the scope of its powers is broad, for breadth and flexibility are inherent in equitable remedies.”⁴⁷ “The Court must weigh the facts and interests on both sides, summon up the discretion of a chancellor, remember that it is a court of conscience and not of legal stricture, and come as close as it can to a fair result. Frequently there are some good arguments on both sides, and that is the case here.”⁴⁸

There is some uncertainty as to whether laches applies where there is a statute of limitations. A statute of limitations “itself takes account of delay,” and the “principal application” of laches “was, and remains, to claims of an equitable cast for which the Legislature has provided no fixed time limitation.”⁴⁹ In the redistricting context, the nature of laches as a “gap-filling, not legislation-overriding” doctrine suggests that it is best considered as a defense to

⁴³ *Env'tl. Def. Fund, Inc. v. Alexander*, 614 F.2d 474, 481 (5th Cir. 1980).

⁴⁴ *Id.* at 478 (citations omitted).

⁴⁵ *Id.*

⁴⁶ *Id.* at 479.

⁴⁷ *Radiator Specialty*, 207 F. App'x at 362 (quotation marks and citation omitted).

⁴⁸ *Jeffers*, 730 F. Supp. at 202.

⁴⁹ *Petrella v. Metro-Goldwyn-Mayer, Inc.*, 572 U.S. 663, 678 (2014); *see also Alexander*, 614 F.2d at 478; *Dotson*, 514 F. Supp. at 400 (discussing and rejecting a laches argument predicated upon “the plaintiffs’ delay exceed[ing] the applicable limitations period”).

last-minute requests for injunctive relief, and should not be wielded more than a year before an election—as our defendants have done by filing a dispositive laches motion in September 2018.⁵⁰

Other authority suggests that laches is unavailable in cases like ours, where the plaintiffs allege an ongoing injury and seek a permanent injunction. In *Miller v. Board of Commissioners*, for example, the Middle District of Georgia held that “laches does not apply to voting rights actions wherein aggrieved voters seek permanent injunctive relief insofar as the electoral system in dispute has produced a recent injury or presents an ongoing injury to the voters.”⁵¹

To put any doubts to rest, though, the Court will proceed to analyze the defense.

b. Analysis

The laches argument quickly fails as to plaintiffs Ayers and Lawson. There is no evidence that either had any indication of a problem with District 22’s boundaries and slept on his rights. The mere fact that they are voters in District 22 is not enough, and there is no basis to conclude that DOJ preclearance vests voters with the knowledge of a claim sufficient to hold them accountable via laches.

On the other hand, the defendants make a compelling case that plaintiff Thomas unnecessarily delayed bringing this suit. Prior to preclearance, he expressed to DOJ his belief that the boundaries violated the Voting Rights Act. He then did not act on that belief after DOJ precleared the plan.

Thomas testified that in 2012, he did not know that private parties could bring a § 2 suit. He learned about this legal remedy in mid-2018. Laches, however, “does not depend on

⁵⁰ *Petrella*, 572 U.S. at 680; see *Blackmoon*, 386 F. Supp. 2d at 1115 (concluding that voting rights cases in which the laches defense prevailed involved plaintiffs who “waited until either elections or deadlines relating to elections were imminent before filing their claims”).

⁵¹ 45 F. Supp. 2d 1369, 1373 (M.D. Ga. 1998) (citation and emphasis omitted).

subjective awareness of the legal basis on which a claim can be made.”⁵² It instead asks whether plaintiffs have “an adequate indication” of the problem, which means “[information] enough to alert them to the claim that the authorities were not acting legally.”⁵³ The evidence shows that Thomas had that information. His unawareness of the law in 2012, while credible, is not enough to excuse his delay in pursuing a remedy.

Yet there are other facts that render Thomas’s delay excusable. Thomas did not perceive a legal violation in 2012 and then sit on his laurels. He decided to take a risk and enter the 2015 election in an attempt to prove that an African-American *could* win District 22 despite its boundaries. In other words, the time between 2012 and 2015 is excusable, if not laudable, because Thomas sought to remedy the problem through the political process.⁵⁴

The defendants hammer the idea that District 22’s BVAP cannot constitute a § 2 violation because, as the Supreme Court wrote, “minority voters are not immune from the obligation to pull, haul, and trade to find common political ground, the virtue of which is not to be slighted in applying a statute meant to hasten the waning of racism in American politics.”⁵⁵ But “pull, haul, and trade to find common political ground” is exactly what Thomas did in the 2015 election cycle. He should be credited for turning to the political process first—for attempting to make this litigation unnecessary—rather than penalized for the time that elapsed between preclearance in 2012 and the November 2015 election.

⁵² *Alexander*, 614 F.2d at 479.

⁵³ *Id.*

⁵⁴ In notable contrast is the defendants’ principal case, in which the plaintiff admitted that he delayed filing suit because he was not “a political person” and “kept thinking at some point that somebody would step up to protect the interest of Lincoln Parish.” *Maxwell v. Foster*, No. 98-1378, 1999 WL 33507675, at *3 (W.D. La. Nov. 24, 1999) (brackets omitted).

⁵⁵ *Johnson v. De Grandy*, 512 U.S. 997, 1020 (1994). Twenty-five years later, Americans are likely more aware that racism can spike just as it can wane. See, e.g., John Eligon, *Hate Crimes Increase for the Third Consecutive Year*, *F.B.I. Reports*, N.Y. Times, Nov. 13, 2018.

What remains is prejudice. “It is difficult to say that a government agency can be prejudiced by forcing it to comply with the law,” the Fifth Circuit has observed.⁵⁶ But plainly there are circumstances where prejudice to the government warrants application of the doctrine. In *Alexander*, for example, the court found that a suit against the Army Corps of Engineers was properly dismissed because the plaintiffs had inexcusably delayed while the Corps spent \$176 million on the project in question.⁵⁷ And in the defendants’ principal case, *Maxwell v. Foster*, the court found laches appropriate because the plaintiffs had inexplicably delayed a suit seeking to declare the *entire* state legislative map unconstitutional. No. 98-1378, 1999 WL 33507675, at *4 (W.D. La. Nov. 24, 1999).

The evidence in our case weighs against a finding of undue prejudice. The plaintiffs filed this suit in July 2018. That was 16 months before the 2019 general election, 13 months before the primaries, and eight months before the qualification deadline. This timeframe is more than enough to litigate their single-district, single-count claim.⁵⁸ It is not remotely comparable to the \$176 million sum the *Alexander* court noted or the statewide relief the plaintiffs in *Maxwell* sought.

The Court will turn to the merits.

C. Section 2 of the Voting Rights Act

1. The *Gingles* Preconditions

The evidence on the first and second *Gingles* preconditions is not contested.

⁵⁶ *Alexander*, 614 F.2d at 480.

⁵⁷ *Id.*

⁵⁸ There is the matter of the flip-side of the argument. Thomas filed this suit only after running in the first election under the current boundaries. Had he filed before running, the defendants would almost certainly be asking the Court to dismiss the action because it is a district that theoretically can be won by an African-American. *He should at least try first*, they would say. In 2015, however, Thomas tried, and he now makes a compelling case (as explained more fully below) as to why new boundaries should be drawn.

African-Americans in District 22 are already a sufficiently large and geographically compact group as to constitute a majority in a single-member district; the present BVAP exceeds 50%. The plaintiffs' three alternative maps show that the BVAP can be increased without impairing the District's compactness.⁵⁹

It also is undisputed that African-American voters in District 22 are politically cohesive. Dr. Palmer's analysis is sound and Dr. Morrison did not attempt to opine otherwise, as he admitted that he has never run EI and does not perform that kind of analysis. Dr. Morrison also did not dispute Dr. Palmer's finding of racially polarized voting.

The parties genuinely dispute the third *Gingles* precondition: whether white bloc voting usually defeats the African-American community's candidate of choice. But the defendants' expert opinions on this point turned out to be flawed in important ways.

We should start by observing that some of Dr. Morrison's methods were unreliable and led him to incorrect facts. In several instances he inaccurately coded winning officials as having lost, or incorrectly coded a candidate's race—an error apparently caused by the fact that he discerned a candidate's race via Facebook and other public websites.⁶⁰ At other times, he did not have any evidence as to whether a candidate was in fact preferred by the African-American community, and simply assumed that black candidates were preferred by the black community.

⁵⁹ Although Dr. Morrison noted at trial that he did not contest the first *Gingles* precondition, his report asserted that Plan 1 would "damage" District 23's compactness. This assertion is not borne out by the facts. Cooper's supplemental report shows that redrawn Districts 22 and 23 would satisfy the Polsby-Popper test and have Reock scores well-within the range of Mississippi's 2012 Senate and House maps.

⁶⁰ This kind of coding is truly perilous. *Cf. Fish v. Kobach*, 309 F. Supp. 3d 1048, 1092–93 (D. Kan. 2018) ("Richman and a graduate student assistant went through the suspense list and determined which names were, in their view, foreign. Neither Dr. Richman nor his assistant had any experience in identifying so-called foreign names. By his own admission, their determinations were subjective and based primarily on whether the name was 'anglophone,' meaning originating in the British Isles. Dr. Richman also testified that their work was performed quickly, and that they made many mistakes along the way. A review of their coding revealed inconsistencies; for example, of five individuals with the last name of 'Lopez,' two were coded as foreign and three were coded as non-foreign. On cross examination, Dr. Richman admitted that he would have coded Carlos Murguia, a United States District Judge sitting in this Court, as foreign.").

Dr. Morrison's decision to include uncontested races in his analysis is curious, too; on cross-examination he admitted that these only shed light "indirectly" on the third *Gingles* precondition.^{61, 62}

The more significant problem lies in the scope of Dr. Morrison's review. In looking at local elections *within* Counties, he never stepped back to consider whether white voters across *the entirety of* District 22 engage in bloc voting. It is no surprise that voters in Humphreys County would elect an African-American Circuit Clerk. But Senate District 22 spans five other Counties. Dr. Morrison never considered how the aggregate population of District 22 tends to vote when electing a Senator to represent the entire area.

Dr. Morrison is an experienced demographer. He knows the problems with his testimony: he admitted that endogenous elections have more persuasive value than the local elections he compiled, he did not look at voter turnout in odd-numbered years, and he conceded that the Census explicitly cautions that survey respondents overreport their voting behavior.⁶³ He may also be hemmed in by the instructions given to him by his clients.

Whatever Dr. Morrison's reasons, though, in this matter his review was too narrow. He is like a climatologist arguing that December is a warm month solely because December 9, 10, 18, and 31 were warm days; the limited facts he has gathered do not support his broad conclusions. It is not credible to draw a conclusion about white bloc voting in District 22 based exclusively on

⁶¹ Uncontested elections present "special circumstances." *Gingles*, 478 U.S. at 51, 57.

⁶² It also is not clear if Dr. Morrison's definition of viable candidate satisfies Fifth Circuit caselaw. *Compare* Defendants' Exhibit 14 at 6 n.4 *with* *Teague v. Attala Cty., Miss.*, 92 F.3d 283, 289 (5th Cir. 1996). The Court does not recall hearing evidence on this point and declines to make any findings on it.

⁶³ Dr. Morrison testified that the plaintiffs' alternate maps engage in packing and cracking. He is incorrect. There is neither, since African-Americans would not "constitute an excessive majority" in District 22, *Voinovich*, 507 U.S. at 154 (quotation marks and citation omitted), and because District 23 would remain an influence district, *see Smith*, 189 F. Supp. 2d at 536-37. The fact that BVAP in District 23 would "necessarily be reduced" in a redrawn map is no basis to enter judgment for the defendants; some "loss of influence" is "found in every § 2 case." *Clark v. Calhoun Cty., Miss.*, 21 F.3d 92, 95 (5th Cir. 1994).

the fact that there are some black elected officials in parts of the District.⁶⁴ The Fifth Circuit rejected this reasoning 25 years ago when it found that “municipal elections in Bruce and Vardaman do not demonstrate that black citizens have an equal opportunity to elect their preferred candidates to county-wide offices.”⁶⁵

The defendants certainly attempted to discredit Dr. Palmer’s competing report. They pointed out that in the 2015 Senate District 22 election, approximately 1,500 voters in Bolivar County received ballots for the wrong Senate race. Dr. Palmer freely agreed that this was a “significant election administration error” which justified his decision to exclude those precincts, in that race, from the EI analysis. He explained that the analysis remains valid because EI identifies the pattern of behavior running through a series of elections over time.⁶⁶ The defendants presented no evidence indicating that Dr. Palmer’s approach was in error or would cast any shadow on his conclusions.⁶⁷

Considering all of the expert testimony, the Court finds Dr. Palmer’s thorough and largely un rebutted analysis to be persuasive. It accepts his findings as to white bloc voting and rejects Dr. Morrison’s alternate perspective.⁶⁸ The result is that the plaintiffs have established that white

⁶⁴ Perhaps due to the concerns raised on cross-examination, defense counsel did not attempt to rehabilitate Dr. Morrison’s testimony and waived redirect of his only expert.

⁶⁵ *Clark*, 21 F.3d at 97. “Thus, in analyzing voting patterns in Calhoun County, the district court should accord greater weight to the virtual absence of black electoral success in county-wide elections as opposed to their limited electoral success in municipal elections.” *Id.*

⁶⁶ *See Gingles*, 478 U.S. at 57 (“[A] pattern of racial bloc voting that extends over a period of time is more probative of a claim that a district experiences legally significant polarization than are the results of a single election.”); *Teague*, 92 F.3d at 288–89 (“Vote dilution is a determination that must be made over time and over the course of many elections.”).

⁶⁷ Defense counsel later speculated that Thomas’s efforts to draw white crossover votes had *succeeded*—maybe white voters in Bolivar County *would* vote for black candidates if only given the chance, he said—but the votes had gone uncounted because these voters were given the wrong ballot. Counsel for the plaintiffs called it “fantastical” to assume that these predominantly white precincts would have voted for Thomas, given the long, documented history of white bloc voting in Mississippi. Of course, none of this argument constitutes evidence. What is in evidence, however, is Thomas’s testimony that he also pursued white crossover votes in Madison County—a place without election maladministration—and still did not garner enough to prevail.

⁶⁸ *See Monroe v. City of Woodville, Miss.*, 881 F.2d 1327, 1330 (5th Cir. 1989) (“At the outset, we note that the district judge discounted the statistical evidence presented by the appellants as severely flawed. The weaknesses he observed are particularly damaging to the appellants’ case because this information constituted the bulk of their

bloc voting in District 22 defeats the African-American community's candidate of choice. The plaintiffs have proven all three *Gingles* preconditions.

2. The Senate Factors

The next considerations are the Senate factors, which through different angles try to shed light on whether African-Americans in District 22 have an equal opportunity to elect their candidate of choice. Answering this ultimate question “depends upon a searching practical evaluation of the past and present reality, and on a functional view of the political process.”⁶⁹

First, Mississippi plainly has a long history of official discrimination against African-Americans seeking to vote.⁷⁰ To their credit, the defendants acknowledged this fact.

The plaintiffs supplemented this history with reports from Fred Banks, a former Legislator and Justice of the Mississippi Supreme Court, and John Horhn, a State Senator for the past 26 years. Banks and Horhn described the slow gains African-Americans made in running for and winning seats in the Mississippi Legislature. They also described racial appeals they experienced and observed during their decades in elective office.⁷¹ Their reports will be discussed more below.

Second, Dr. Palmer presented expert testimony that voting in District 22 features “a high level of racial polarization.” The defendants' expert did not challenge this factor.

The third and fourth factors are irrelevant. Neither side presented evidence that District 22 has unusual practices that enhance the opportunity for racial discrimination or a candidate slating process.

evidence on the issues of black political cohesiveness and white bloc voting. Dr. Love, appellants' statistical expert, faced difficulties in producing useful data for the court.”).

⁶⁹ *Gingles*, 478 U.S. at 45 (quotation marks and citations omitted).

⁷⁰ *See Teague*, 92 F.3d at 293–94 (“That Mississippi has a long and dubious history of discriminating against blacks is indisputable.”).

⁷¹ Defense counsel objected to the reports' descriptions of racial appeals, believing them to be stale. The following discussion will show that the Court has considered the reports but given them appropriate weight.

Fifth, the plaintiffs presented evidence of substantial socio-economic disparities between District 22's African-American and white populations. There are vast differences between the two groups on education, employment, income, housing, and health indices, among others, that ultimately reflect the effects of slavery and segregation.

The plaintiffs, although “not required to prove a causal connection between these factors and a depressed level of political participation,” introduced evidence that these socio-economic factors likely negatively impact voter turnout and that African-American communities in the Delta are less likely to have transportation options that facilitate voter turnout in odd-year elections.⁷² Their evidence is consistent with the Supreme Court's recognition “that political participation by minorities tends to be depressed where minority group members suffer effects of prior discrimination such as inferior education, poor employment opportunities, and low incomes.”⁷³

The defendants' expert sought to minimize the on-the-ground realities by pointing to statewide data showing that African-American Mississippians report higher voter turnout than white Mississippians in even-year elections. These data points fail to persuade. They look at the wrong jurisdiction, the wrong election years, and rely upon known issues with self-reported voting surveys—issues that EI, in contrast, seeks to overcome. The fifth Senate factor supports the plaintiffs.

The sixth Senate factor asks about overt or subtle racial appeals. The Banks and Horhn reports described several overt racial appeals made in elections up to 2004, but the plaintiffs did not put on evidence of any recent racial appeals.⁷⁴

⁷² *Id.* at 294.

⁷³ *Gingles*, 478 U.S. at 69 (citations omitted).

⁷⁴ There have been overt racial appeals in Mississippi elections since 2004. During the hotly-contested Initiative 42 campaign in 2015, for example, State Representative Bubba Carpenter told the Tishomingo County Midway

Seventh, the plaintiffs presented evidence that African-Americans have not been elected to the Senate from District 22. The defendants’ attempt to reframe the issue and look at local offices within District 22—which, not incidentally, have higher BVAPs—is not persuasive for the reasons already discussed at length.

Even after considering all of these factors, the Supreme Court has instructed district courts to be cautious about finding a § 2 violation where the “districting scheme” features “majority-minority districts in substantial proportion to the minority’s share of voting-age population.”⁷⁵ Electoral maps that “apparently provid[e] political effectiveness in proportion to voting-age numbers” typically do not “deny equal political opportunity” and should not be the basis for liability.⁷⁶

That concern is unwarranted here. The 2010 Census data showed that Mississippi was 59.1% white and 40.9% non-white. After redistricting with these data, therefore, one might have expected fresh maps to result in an upper legislative chamber with something like 31 white Senators and 21 non-white Senators. But there are only 15 majority-minority Senate Districts and

Republican Rally that “[i]f 42 passes in its form, a judge in Hinds County, Mississippi, predominantly black—it’s going to be a black judge—they’re going to tell us where the state education money goes.” Sam R. Hall, *Rep. Carpenter injects race into Initiative 42*, The Clarion-Ledger, Oct. 18, 2015. His pitch was an appeal to racism and fear, not a statement of fact: the Hinds County bench was divided equally between “blacks” and whites.

As recently as November 2018, U.S. Senator Cindy Hyde-Smith was criticized for saying, at a public campaign rally in Tupelo, that she was so loyal to one of her friends (who she then brought out from the audience) that “I would fight a circular saw for him. . . . If he invited me to a public hanging, I’d be on the front row.” Caleb Debillion, *Hyde-Smith deflects questions about ‘public hanging’ comments*, Daily Journal, Nov. 12, 2018. Some thought she was making an “inartful compliment.” *Did Cindy Hyde-Smith’s inartful compliment of a supporter go too far?*, Y’all Politics, Nov. 11, 2018. Others thought she was making a “sick” reference to lynching, *see* Matthew Haag, *Mississippi Senator’s ‘Public Hanging’ Remark Draws Backlash Before Runoff*, N.Y. Times, Nov. 12, 2018—a sensitive subject given that her opponent in the runoff election was African-American and Mississippi has a history of “brutal and terrifying lynchings.” Eric Etheridge, *Judge Carlton Reeves: Resurrecting the Nightmarish Specter of Lynchings in Mississippi*, Breach of Peace, Feb. 11, 2015, <https://breachofpeace.com/blog/?p=612>.

These examples are not in evidence and will not be considered further. Even if they were in evidence, on this record, the Court would still find that no racial appeals, overt or implied, have been recently made in District 22 or have had an effect on any District 22 election within the timeframe of the plaintiffs’ case.

⁷⁵ *De Grandy*, 512 U.S. at 1013.

⁷⁶ *Id.* at 1014.

the Senate has never had more than 13 African-American members.⁷⁷ In plain English, Mississippi's Senate is much whiter than Mississippi.

Congress has emphasized that the representation gap is not itself a sufficient reason to redistrict the Senate and create additional majority-minority districts. Section 2 of the Voting Rights Act explicitly denies “a right to have members of a protected class elected in numbers equal to their proportion in the population.”⁷⁸ The representation gap instead suggests that the Mississippi Senate does not provide political effectiveness in proportion to minority voting-age numbers and, therefore, that the defendants do not qualify for the kind of § 2 immunity the Supreme Court set forth in *De Grandy*.

* * *

Having satisfied the three *Gingles* preconditions, and given the persuasive evidence on Senate factors one, two, five, and seven, the plaintiffs have established that District 22's lines result in African-Americans having less opportunity than other members of the electorate to elect the State Senator of their choice.

D. Additional Arguments

The defendants seek judgment as a matter of law by contending that “as a matter of simple mathematics,” a minority group that has a voting-age population of 50% or more cannot prove a denial of equal opportunity under § 2. Put bluntly, the claim is that African-Americans' low turnout in odd-year elections is their problem. The Fifth Circuit, however, foreclosed this line of reasoning in *Monroe v. City of Woodville, Mississippi*.⁷⁹ “Unimpeachable authority from

⁷⁷ Demography is not necessarily destiny, of course. It should go without saying that voters can (and do) cross racial lines to vote for their candidate of choice: communities of color sometimes elect white politicians, and vice versa. In the Jackson region, District 29 is a majority-minority area (with a BVAP of 53.4%) that continues to elect a white person to the Senate.

⁷⁸ 52 U.S.C. § 10301(b).

⁷⁹ 881 F.2d 1327, 1329 (5th Cir. 1989).

our circuit has rejected any *per se* rule that a racial minority that is a majority in a political subdivision cannot experience vote dilution.”⁸⁰ Put differently, “low minority voter turnout does not militate against finding a Section 2 violation.”⁸¹

The defendants then argue that finding a § 2 violation in this case will open the floodgates for plaintiffs to challenge every majority-minority district in Mississippi. But this is at odds with Dr. Morrison’s (accurate) observation that Mississippi has a substantial number of African-American elected officials. In the hundreds of municipal and county districts in which they sit, the presumptive plaintiffs will be unable to prove a § 2 violation precisely because they will have experienced electoral success despite the legacy of discrimination. The Court fundamentally disagrees that this ruling will have significant reach outside of Districts 22 and 23.

E. Remedies

As the Court recited in its February 13 Order, the Legislature is entitled to the first opportunity to redraw District 22 and, if it chooses, extend the March 1 qualification deadline for candidates in the affected Districts.⁸² “Although it may be difficult for the Legislature to adopt a plan,” a “legislative plan is unequivocally to be preferred over a court-ordered plan . . . [W]e encourage the Legislature to act.”⁸³

IV. Conclusion

The plaintiffs have established by a preponderance of the evidence that the present boundaries of Mississippi Senate District 22 violate § 2 of the Voting Rights Act. The Court will decline to order any specific relief while the Mississippi Legislature considers whether to redraw

⁸⁰ *Id.* at 1333 (citation omitted). Practically speaking, this prohibits entrenched political powers from drawing a series of extremely marginal majority-minority districts with the expectation that the majority-minority group will be unable to turn out in numbers sufficient to ever elect a candidate of their choice.

⁸¹ *Benavidez*, 638 F. Supp. 2d at 725 (collecting cases).

⁸² *See LULAC*, 548 U.S. at 416.

⁸³ *Smith*, 189 F. Supp. 2d at 511-12.

the District and extend the candidate qualification deadline. A hearing will be set for the near future.

SO ORDERED, this the 16th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

Case 3:18-cv-00441-CWR-FKB Document 74 Filed 02/26/19 Page 1 of 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

The Mississippi Legislature has not redrawn the boundaries of Senate District 22, and the candidate qualification deadline is approaching. The Court therefore orders as follows:

1. The candidate qualification deadline is extended to March 15, 2019, for all persons seeking to qualify for Mississippi Senate Districts 22 and 23. No other deadlines, jurisdictions, or offices are affected.

2. The boundaries of Districts 22 and 23 are amended to conform to plaintiffs' illustrative Plan 1. The defendants shall publish and transmit the Plan to the affected Circuit Clerks and other relevant officials.

A separate Final Judgment shall issue this day.

SO ORDERED, this the 26th day of February, 2019.

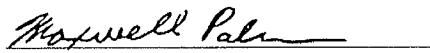
s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 1

Expert Report for
Thomas v. Bryant

Maxwell Palmer

December 6, 2018
Revised December 10, 2018

A handwritten signature in cursive script, reading "Maxwell Palmer", followed by a horizontal line.

Maxwell Palmer, Ph.D.
December 10, 2018

I Statement of Inquiry

1. I have been asked to evaluate racially polarized voting in Mississippi State Senate District 22 under the redistricting plan enacted by the Mississippi State Legislature in 2012.

II Summary of Analysis and Findings

2. Using ecological inference I find that African American and white voters are highly polarized in elections between African American and white candidates. Large, cohesive majorities of African Americans support African American candidates, and whites vote sufficiently as a bloc to nearly always defeat the candidate of choice of African American voters.

III Qualifications

3. I am currently an Assistant Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. In 2014 I was also appointed as a Junior Faculty Fellow at the Hariri Institute for Computing at Boston University. I teach and conduct research on American politics and political methodology.

4. I have published academic work in leading peer-reviewed academic journals, including *The American Political Science Review*, *The Journal of Politics*, and *Perspectives on Politics*. I have published work on compactness in redistricting in *The Ohio State University Law Review* and on traditional redistricting principles in *The Journal of Politics*. My curriculum vitae is attached to this report. My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations.

5. I testified before the U.S. District Court for the Eastern District of Virginia as an expert in “redistricting and data analysis as it pertains to redistricting” in *Bethune Hill v. Virginia* (3:14-cv-00852-REP-AWA-BMK). I worked as a data analyst assisting testifying experts in multiple cases concerning congressional and state legislative districting, including: *Perez v. Perry*, in the U.S. District Court for the Western

District of Texas (No. 5:11-cv-00360); *LULAC v. Edwards Aquifer Authority* in the U.S. District Court for the Western District of Texas, San Antonio Division (No. 5:12cv620-OLG,); *Harris v. McCrory* in the U. S. District Court for the Middle District of North Carolina (No. 1:2013cv00949); *Guy v. Miller* in the U.S. District Court for Nevada (No. 11-OC-00042-1B); *In re Senate Joint Resolution of Legislative Apportionment* in the Florida Supreme Court (Nos. 2012-CA-412, 2012-CA-490); and *Romo v. Detzner* in the Circuit Court of the Second Judicial Circuit in Florida (No. 2012 CA 412).

6. I am being compensated at a rate of \$300/hour for my work in this case.

IV Data

7. I relied on the following primary data sources for this report. All data was provided by counsel.

1. Precinct-level election results compiled from county reports, available from the website of the Mississippi Secretary of State.¹
2. Census data on population and voting age population (VAP) by race, from the 2010 United States Census and from the Mississippi Standing Joint Legislative Committee on Reapportionment and Redistricting, including reports on precinct-level voting age population of each precinct under the 2002 and 2012 state senate redistricting plans.²
8. Analyzing racial voting patterns requires data on population by race and data on election results, at the same level of aggregation. The lowest level of election result reporting is the precinct, which are generally drawn by county officials along census block lines.
9. To construct the data for analysis, we began with three reports prepared by the Mississippi Standing Joint Legislative Committee on Reapportionment and Redistricting. The first identified the precincts assigned to each district in the 2002 plan with census data from 2000³, the second identified precincts assigned to each district in the 2002 plan with census data from 2010⁴, and the third identified precincts

¹<http://www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx>

²<http://www.msjrc.state.ms.us/>

³http://www.msjrc.state.ms.us/pdf/senate_detail.pdf

⁴http://www.msjrc.state.ms.us/pdf/senate_bench.pdf

assigned to each district in the 2012 plan with census data from 2010.⁵ Using these precincts as a starting point, we then updated each precinct based on information we uncovered regarding changes to precinct boundaries, splits, and reorganizations, and merged the population data with the precinct-level election results in each year.

10. As reported by the Joint Committee when the 2002 plan was adopted, 42.1% of the VAP in Senate District 22 was African American under the 2000 census. In 2011, the Committee released a report stating that 49.8% of the VAP was African American according to the 2010 census. Under the plan adopted in 2012, 50.8% of the VAP was African American under the 2010 census.

11. The State Senate elections in 2003, 2007, and 2011 were conducted using the 2002 plan. The 2015 election was conducted using the 2012 plan. For purposes of analyzing the 2003 elections, I utilized precinct VAP, as reflected in 2000 census data, for the precincts in the 2002 plan. For the 2007 and 2011 elections, I utilized precinct VAP, as reflected in 2010 census data, for the precincts in the 2002 plan. For the 2015 election, I utilized precinct VAP, as reflected in the 2010 census data, for the 2012 plan.

V Racially Polarized Voting

12. I use ecological inference (EI) to analyze racially polarized voting in Senate District 22. Ecological Inference is a statistical procedure that estimates group-level candidate preferences based on aggregate data. I use the MCMC implementation of the multinomial-Dirichlet eiRxC method using the R package eiPack. The outputs of this analysis are estimates of the percentage of each group (African Americans, and non-African Americans) voting for each of the two major-party candidates in each election or abstaining from voting. The outputs include both a mean estimate (the most likely vote share), and a 95% confidence interval (the range in which 95%

⁵https://www.maris.state.ms.us/pdf/MS2010SenateDist/TRP_FINAL_REPORT.pdf

of the simulated estimates fall)).⁶

13. In all of the analyses below, I analyze racially polarized voting using two groups, blacks and non-blacks. The non-black minority “other” population in District 22 is sufficiently small that combining it with white voters does not materially affect the results.

14. This report focuses on elections between minority candidates and white candidates. As demonstrated by my analysis, African American voters often support African American candidates, and these candidates of choice are routinely defeated in Senate District 22 in elections characterized by racially polarized voting. Therefore I conclude that African American voters have a difficult time electing candidates of choice in Senate District 22.

15. Here, I have analyzed 10 elections for state officeholders involving African American candidates running against white candidates in the general election: elections for Senate District 22 in 2003, 2007, and 2015; for Governor in 2011 and 2015, for Lieutenant Governor in 2003, for Treasurer in 2003, for Commissioner of Insurance in 2007, for Commissioner of Agriculture in 2015, and for Secretary of State in 2015. In all ten elections, the Democratic candidate was African American and the Republican candidate was white. In 2003, there was also an African American candidate for State Senate in District 22 who ran as an independent. I combine the vote totals for both African American candidates for this election, such that the results show the percentage of each racial group voting for *either* African American candidate.

16. In all ten elections with African American and white candidates, the white candidate won the majority of the vote within Senate District 22. Table A1 lists the results for each election. The highest vote share for an African American candidate for Senate District 22 was 46% in 2015.

17. Using EI, I find strong evidence of racially polarized voting in all ten elections between African American and white candidates for state offices. Figure 1 presents the results of this analysis. The circles represent the average estimated vote share for

⁶The specific model used here estimates the share of African Americans and non-African Americans (1) voting for the Democratic candidate, (2) voting for the Republican candidate, or (3) not voting. Votes for third party candidates are excluded, with the exception of the independent candidate for State Senate in 2003 (see ¶15). Split precincts are included for Senate District 22 contests and excluded for statewide contests. Estimates and confidence intervals are calculated using 100,000 simulations for each election. Vote choice estimates are scaled as percentages of the 2-party vote. I also estimated separate models for vote choice and turnout; the results from using two separate models were consistent with the results from the joint vote choice and turnout model presented here.

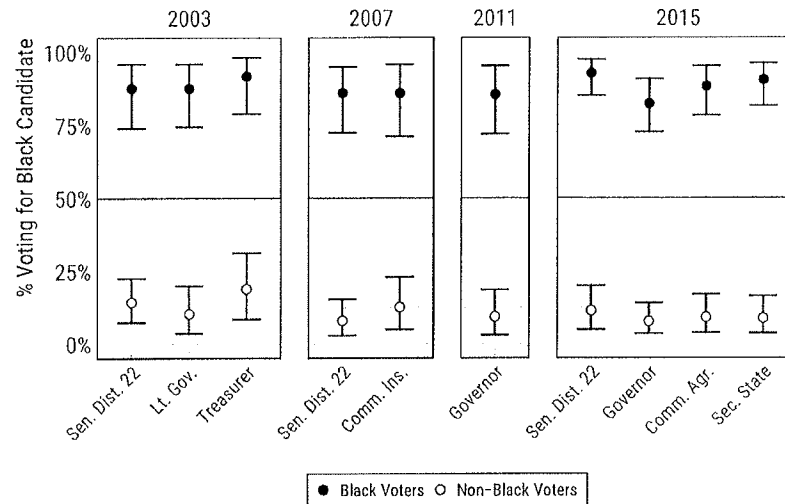


Figure 1: Ecological Inference Estimates of Contests with African American and White Candidates

each group in each election, and the vertical lines are 95% confidence intervals. The same pattern persists across all ten elections: large majorities of African American voters supported the African American candidates, and large majorities of white voters supported the white candidates. The average level of support for African American candidates by African American voters ranged from 82% to 93% and the average level of support of African American candidates by white voters ranged from 8% to 19%. The differences between African American and white support for African American candidates in all contests are statistically significant; a large majority of African American voters choose African American candidates, and a large majority of white voters consistently voted as a bloc to defeat the African American candidate of choice.⁷

18. I also analyzed the general election for Senate District 22 in 2011. Both major party candidates were white. Table A1 includes the overall result this election and Table A3 provides the racially polarized voting results for this contest. 83% of African American voters supported the Democratic candidate while 84% of the white voters supported the Republican candidate. The African American candidate of choice was

⁷Table A2 presents the results used in Figure 1.

defeated.

19. I estimate voter participation by race using the 2003, 2007, 2011, and 2015 elections for Senate District 22 (regardless of the race of the candidates). Without the number of registered voters in each precinct, I cannot estimate voter turnout as a share of registered voters by race. Instead I estimated the share of the voting age population that casts a vote for the office at issue in this case.

20. Figure 2 presents the results of the voter participation analysis. In all four elections, I find that on average African Americans voted at lower rates than whites. The average participation gap was 10.2 percentage points in 2003 (34.7% African American participation and 45.0% white participation), 14.6 percentage points in 2007 (24.7% African American participation and 39.3% white participation), 8.0 percentage points in 2011 (31.3% African American participation and 39.3% white participation), and 7.3 percentage points in 2015 (29.6% African American participation and 36.9% white participation). The difference in voting between the two groups is statistically significant in 2003, 2007, and 2015, and weakly significant in 2011.⁸

21. I understand that Plaintiffs expert demographer has created an alternative plan for Senate District 22 that would have an African-American voting age population of 62%. Based upon the vote choice and turnout estimates from the ecological inference analysis of the 2015 SD 22 election, and assuming that any African American and white populations added to or removed from the district vote in the same ways as the current groups, it is my opinion that this alternative district would provide African American voters with a realistic opportunity to elect candidates of their choice.

VI Conclusions

22. There is a high level of racial polarization between African Americans and whites in Senate District 22. In every elections I analyzed, African American voters cohesively support African American candidates, and white voters vote sufficiently as a bloc to defeat the candidates of choice of African American voters.

⁸Statistical significance is assessed using one-sided tests based on the simulated EI results. $p = .040$ in 2003, $p = .004$ in 2007, $p = .018$ in 2015, and $p = .084$ in 2011. Table A4 presents the results used in Figure 2.

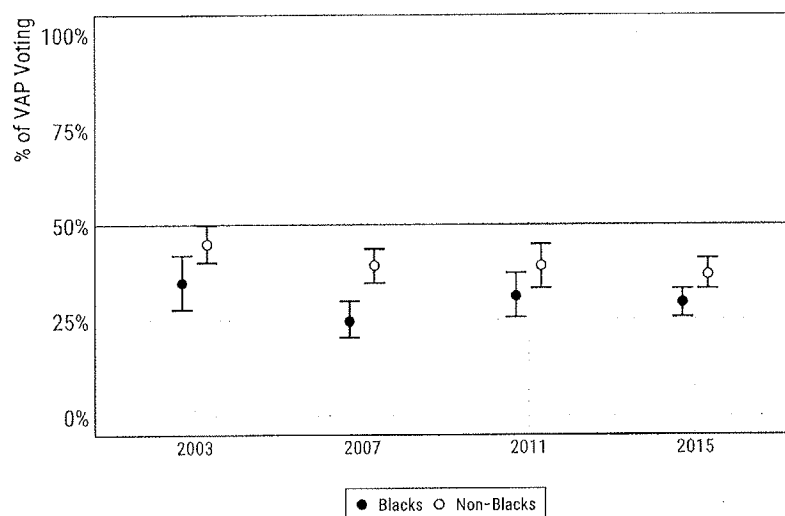


Figure 2: Ecological Inference Estimates for Voter Participation

A Appendix

Table A1: Election Results in Senate District 22

Year	Election	Black Candidate %	White Candidate %
2003	Sen. Dist. 22	44.3	55.7
	Lt. Gov.	43.9	56.1
	Treasurer	49.1	50.9
2007	Sen. Dist. 22	41.3	58.7
	Comm. Ins.	49.0	51.0
2011	Governor	47.8	52.2
2015	Sen. Dist. 22	46.1	53.9
	Governor	36.7	63.3
	Comm. Agr.	41.8	58.2
	Sec. State	42.1	57.9
Year	Election	Dem. Candidate %	Rep. Candidate %
2011	Sen. Dist. 22	46.1	53.9

Note: For Senate District 22 elections, when a precinct is split, only the part of the precinct in the district is included. However, for purposes of reporting the results in statewide elections, the total vote in the full precinct is included because separate results for each part of split precincts are not available. 2003 Senate District 22 results includes the total votes received by the two African American candidates. Third-party or independent candidates in the 2003 elections for Lieutenant Governor and Treasurer and the 2015 elections for Governor, Commissioner of Agriculture, and Secretary of State are omitted.

Table A2: EI Estimates for Reported Contests with African American and White Candidates

Year	Election	% Voting for Black Candidate	
		Blacks	Non-Blacks
2003	Sen. Dist. 22	0.877 (0.740, 0.960)	0.144 (0.073, 0.226)
	Lt. Gov.	0.877 (0.745, 0.960)	0.104 (0.037, 0.199)
	Treasurer	0.918 (0.790, 0.981)	0.190 (0.085, 0.312)
2007	Sen. Dist. 22	0.861 (0.724, 0.949)	0.080 (0.028, 0.154)
	Comm. Ins.	0.860 (0.712, 0.958)	0.126 (0.050, 0.229)
2011	Governor	0.856 (0.720, 0.952)	0.093 (0.031, 0.185)
2015	Sen. Dist. 22	0.928 (0.850, 0.974)	0.114 (0.049, 0.199)
	Governor	0.824 (0.726, 0.908)	0.077 (0.034, 0.139)
	Comm. Agr.	0.883 (0.784, 0.951)	0.091 (0.037, 0.169)
	Sec. State	0.905 (0.816, 0.960)	0.087 (0.035, 0.163)

Table A3: EI Estimates for Reported Contests with Two White Candidates

Year	Election	% Voting for Democratic Candidate	
		Blacks	Non-Blacks
2011	Sen. Dist. 22	0.825 (0.699, 0.934)	0.162 (0.073, 0.262)

Table A4: EI Estimates for Voter Participation in SD 22 Elections

Year	% Voting	
	Blacks	Non-Blacks
2003	0.347 (0.278, 0.419)	0.450 (0.401, 0.498)
2007	0.247 (0.204, 0.299)	0.393 (0.346, 0.437)
2011	0.313 (0.256, 0.374)	0.393 (0.333, 0.448)
2015	0.296 (0.257, 0.332)	0.369 (0.331, 0.411)

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REFEREED PUBLICATIONS	<p>Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. Forthcoming. “Who Participates in Local Government? Evidence from Meeting Minutes.” <i>Perspectives on Politics</i>.</p> <p>Palmer, Maxwell and Benjamin Schnee. Forthcoming. “Post-Political Careers: How Politicians Capitalize on Public Office.” <i>Journal of Politics</i>.</p> <p>Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. Forthcoming. “City Learning: Evidence of Policy Information Diffusion From a Survey of U.S. Mayors.” <i>Political Research Quarterly</i>.</p> <p>Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pres- sel. Forthcoming. “Do Mayors Run for Higher Office? New Evidence on Pro- gressive Ambition.” <i>American Politics Research</i>.</p> <p>Ansolahehere, Stephen, Maxwell Palmer and Benjamin Schnee. 2018. “Divided Government and Significant Legislation, A History of Congress from 1789-2010.” <i>Social Science History</i> 42(1): 81–108.</p> <p>Edwards, Barry, Michael Crespín, Ryan D. Williamson, and Maxwell Palmer. 2017. “Institutional Control of Redistricting and the Geography of Representa- tion.” <i>Journal of Politics</i> 79(2): 722–726.</p> <p>Palmer, Maxwell. 2016. “Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?” <i>Journal of Empirical Legal Studies</i> 13(1): 153– 177.</p>	

	Palmer, Maxwell and Benjamin Schneer. 2016. "Capitol Gains: The Returns to Elected Office from Corporate Board Directorships." <i>Journal of Politics</i> 78(1): 181–196.
	Gerring, John, Maxwell Palmer, Jan Teorell, and Dominic Zarecki. 2015. "Demography and Democracy: A Global, District-level Analysis of Electoral Contestation." <i>American Political Science Review</i> 109(3): 574–591.
OTHER PUBLICATIONS	<p>Ansolabehere, Stephen and Maxwell Palmer. 2016. "A Two Hundred-Year Statistical History of the Gerrymander." <i>Ohio State Law Journal</i> 77(4): 741–762.</p> <p>Ansolabehere, Stephen, Maxwell Palmer, and Benjamin Schneer. 2016. "What Has Congress Done?" in <i>Governing in a Polarized Age: Elections, Parties, and Political Representation in America</i>, eds. Alan Gerber and Eric Schickler. New York, NY: Cambridge University Press.</p>
POLICY REPORTS	Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. "2017 Menino Survey of Mayors." Research Report. Boston University Initiative on Cities.
BOOK MANUSCRIPT	<i>Neighborhood Defenders: Participatory Politics and America's Housing Crisis</i> (with Katherine Levine Einstein and David M. Glick). <i>Under Review</i>
WORKING PAPERS	<p>"Rainmakers: Former Politicians as Lobbyists" (with Pamela Ban and Benjamin Schneer). Invited to Revise and Resubmit, <i>Legislative Studies Quarterly</i>.</p> <p>"Racial Disparities in Housing Politics: Evidence from Administrative Data" (with Katherine Levine Einstein and David M. Glick). <i>Under Review</i>.</p> <p>"The Gender Pay Gap in Congressional Offices" (with Joshua McCrain).</p> <p>"Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Congressional Decision-making on Immigration Votes" (with James Feigenbaum and Benjamin Schneer).</p> <p>"Reexamining the Gender Gap in Support of War" (with Katherine Krimmel and Douglas Kriner).</p> <p>"Corporate Political Activity as a Bundle of Goods" (with Daniel Moskowitz and Benjamin Schneer).</p>
GRANTS AND AWARDS	<p>The Rockefeller Foundation, "Menino Survey of Mayors" (Co-principal investigator). 2017. \$325,000.</p> <p>Hariri Institute for Computing, Boston University. Junior Faculty Fellow. 2017. \$10,000.</p>

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

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

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

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

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

The Dirksen Congressional Center, Congressional Research Award, 2013.

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

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

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

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

SELECTED
PRESENTATIONS

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

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

"Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Immigration Votes in Congress," Annual Meeting of the Southern Political Science Association, New Orleans, LA, 2018.

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

"Corporate Political Activity as a Bundle of Goods," Annual Meeting of the

American Political Science Association, Philadelphia, PA, 2016.

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

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

“The Corporate Boardroom’s Revolving Door,” Annual Meeting of the American Political Science Association, San Francisco, CA, 2015.

“The Corporate Boardroom’s Revolving Door,” Annual Meeting of the European Political Science Association, Vienna, Austria, 2015.

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

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

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Boston University Center for Finance, Law, and Policy, 2015.

“Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?” Annual Meeting of the American Political Science Association, Washington, DC, 2014.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Annual Meeting of the Midwest Political Science Association, Chicago, IL, 2014.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Bowdoin College, 2014.

“Corporate Boards as Legislatures,” Annual Meeting of the Southern Political Science Association, New Orleans, LA, 2014.

“Presidential Legacies and Partisan Balance on the Federal Courts,” Annual Meeting of the Southern Political Science Association, New Orleans, LA, 2014.

“Time and Political Power: Setting the Calendar in a Busy Legislature,” Annual Meeting of the Midwest Political Science Association, Chicago, IL, 2013.

“Using Multiple Elections to Evaluate Districting Maps,” Annual Meeting of the Midwest Political Science Association, Chicago, IL, 2012.

TEACHING Boston Univeristy

- *Introduction to American Politics* (Fall 2014, Fall 2015, Fall 2016, Fall 2017)
- *Congress and Its Critics* (Fall 2014, Spring 2015, Spring 2017)
- *Formal Political Theory* (Spring 2015, Spring 2017)
- *Prohibition, Regulation, and Bureaucracy* (Fall 2015)
- *Political Analysis* (Fall 2016, Fall 2017)

Harvard University

- *American Government* (Head Teaching Fellow, Fall 2012 and Fall 2013)
- *The Politics of Congress* (Head Teaching Fellow, Spring 2013).
- *Introduction to Congress* (Teaching Fellow, Spring 2012).

SERVICE Boston University

- College of Arts and Sciences
 - General Education Curriculum Committee, 2017–2018.
- Department of Political Science
 - Co-organizer, Research in American Politics Workshop, 2016–2018.
 - American Politics Search Committee, 2017.
 - American Politics Search Committee, 2016.
 - Graduate Program Committee, 2014–2015.

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

Reviewer: *American Journal of Political Science*; *American Political Science Review*; *Journal of Politics*; *Quarterly Journal of Political Science*; *Political Analysis*; *Public Choice*; *Political Science Research and Methods*; *Journal of Law, Economics and Organization*; *Election Law Journal*; *Applied Geography*; Cambridge University Press; Oxford University Press.

Coordinator, Harvard Election Data Archive, 2011–2014.

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

Associate, Energy & Environment Practice

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

EXHIBIT 2

Precinct Boundaries Used In Plaintiffs' RPV Analysis

Thomas v. Bryant

Except where noted otherwise, for 2003 elections, we used precinct VAP from Census 2000 as reflected in the legislature's redistricting plan of 2002¹; for 2007 and 2011 elections, we used precinct VAP from Census 2010 as reflected in the legislature's listing of the 2002 plan with 2010 census data²; and for the 2015 election, we used VAP from Census 2010 as reflected in the legislature's redistricting plan of 2012³.

1) 2003

We used the official MARIS 2001 precinct shapefile⁴ as our source for boundary data, except where noted below.

- a) Bolivar County: PACE precinct registered five votes for Senate District 22 (SD22) candidates (in addition to 146 votes for the unopposed SD12 candidate). According to the State of Mississippi Senate Plan As Adopted on 3-21-02, PACE is entirely in SD12. We excluded the precinct and its five votes from our analysis.

We verified this in GIS using MARIS 2001 precincts as published and the SD22 boundary as defined by the published Block Equivalency File⁵. The boundary between PACE and WEST CLEVELAND was at some time between 2001 and 2012 moved eastward (reflected in MARIS 2012 published shapefile⁶) adding hundreds of VAP to a portion of PACE falling in District 22, so this clearly happened *after* the 2003 election.

- b) Humphreys County:
 - i) There were very minor changes to Humphreys County precincts between 2001 and 2012. Differences are not enough to determine whether the 2001 precincts were still in place in 2003, or if some changes had already occurred by the time of the 2003 election. The changes shifted 23 total VAP from NORTH BELZONI to FOUR MILE (both precincts outside SD22) and 5 total VAP from LAKE CITY to SILVER CITY (both precincts inside SD22).⁷ We used both LAKE CITY and SILVER CITY in the analysis due to the very small population uncertainty.
 - ii) The 2003 Election Recap Report for Humphreys County shows two precincts, 3 BELZONI SOUTH and 5 BELZONI SOUTH voting in the SD22 race, when these precincts are clearly in SD13. This is verified in GIS using the SD22 boundary and either of the 2001 or 2012 MARIS precinct shapefiles, as these two Belzoni precincts are unchanged. Both precincts are listed

¹ "Detailed Report" available at http://www.msirc.state.ms.us/ms_senate.html

² "Benchmark Plan: 2002 Geography With 2010 Population" at http://www.msirc.state.ms.us/historical_archive.html

³ "Redistricting Plan: TRP1" at <https://www.maris.state.ms.us/HTM/DownloadData/MS2010Redistricting.html>

⁴ "2001 Voting Precincts" at <https://www.maris.state.ms.us/HTM/DownloadData/Statewide.html>

⁵ "Senate TRP1 Block Equivalency File" at

<https://www.maris.state.ms.us/HTM/DownloadData/MS2010Redistricting.html>

⁶ "2012 Voting Precincts" at <https://www.maris.state.ms.us/HTM/DownloadData/Statewide.html>

⁷ VAP figures from Census 2010.

as whole precincts part of SD13 in the 2002 Senate Plan. We excluded both of these precincts from our analysis.

- iii) The county has the SD21 candidates listed on its election recap report, though no part of the county is in District 21 and no votes were cast for them. This may indicate some potential error in election administration.
- c) Sharkey County: Though there were numerous minor adjustments made to the county's precinct boundaries between 2001 and 2012, the entire county is in District 22 and there is not enough information to determine which vintage to use. We used 2001 boundaries.
- d) Washington County: We used the MARIS 2012 precinct shapefile. With one exception, the names and number of precincts in Washington County's 2003 Election Recap match the MARIS 2012 precinct shapefile, and *do not* match the MARIS 2001 shapefile. This indicates that the changes recorded in the 2012 shapefile were implemented between 2001 and 2003. (The exception is the precinct named AMERICAN LEGION 304 in the MARIS 2012 precinct shapefile, and 3-4 MIXON GARRETT POST in the 2003 Washington County election recap report. By deduction and similarity, the two names clearly refer to the same precinct.)
- e) Yazoo County: MARIS 2001 PRECINCTS, except:
 - i) LAKE CITY PRECINCT: We use the MARIS 2012 boundary. The CARTER precinct was consolidated into LAKE CITY precinct by 2012. CARTER does not appear on the county's 2003 election recap report, indicating that the consolidation occurred between 2001 and 2003.
 - ii) BENTON PRECINCT: By MARIS 2001 boundaries, a small piece of BENTON precinct lies within SD22, but Census 2000 and 2010 show no population within that piece of BENTON. The 1990 precinct boundaries⁸ have the same boundary for BENTON, so it appears not to have changed. By 2012, ZION Precinct had absorbed the split piece of BENTON, so the problem disappears. The 48 total votes cast for SD22 candidates remain a mystery. The precinct is coded SPLIT in the data, but we exclude it from EI since there is no associated population.
 - iii) HOLLY BLUFF and LAKE CITY PRECINCTS: The boundary between the two moved from 2001 to 2012, with neither year's boundary accurately reflecting the boundary of District 22. We adjusted the boundaries of both, but the changes do not affect any of the numbers as the adjustments are in an unpopulated area west of Yazoo City.
 - iv) We noted that a precinct named ENOLA/FAIRVIEW is shown on the 2003 Yazoo County election recap report, while two separate precincts, ENOLA and FAIRVIEW appear in the MARIS 2001 precinct shapefile. This combined precinct is outside SD22 in 2003, but becomes part of SD22 in 2012 redistricting and is relevant in the 2015 election.

2) 2007

We used the official MARIS 2001 precinct shapefile⁹ as our source for boundary data, except where noted below.

- a) Bolivar, Humphreys, and Sharkey Counties: unchanged from 2003.
- b) Washington County: All precinct names are unchanged from 2003 with three minor exceptions:

⁸ "1990 Voting Precincts" at <https://www.maris.state.ms.us/HTM/DownloadData/Statewide.html>

⁹ "2001 Voting Precincts" at <https://www.maris.state.ms.us/HTM/DownloadData/Statewide.html>

- i) 3-4 VFW MIXON-GARRETT POST reverts to the name OLD AMERICAN LEGION. This precinct reports 213 votes for SD22 candidates and 402 votes for SD12 candidates, although the precinct is entirely in SD12. It was entirely in SD12 in 2003 and 2011 and reported votes accordingly. (Precinct was consolidated into METCALF MUNICIPAL BUILDING in 2015.) Because it is entirely outside SD22, we excluded it from our analysis.
- ii) CHRIST WESLEYAN METHODIST renamed COVENANT PRESBYTERIAN. The church is located at 1865 S Main St in Greenville¹⁰ which is inside the precinct formerly known as Christ Wesleyan Methodist. This is clearly a change in polling place location, as Washington County names its precincts after the polling place location.
- iii) GLEN ALLAN LIBRARY renamed GLEN ALLAN HEALTH CLINIC. Glen Allan is a remote, rural community in the southern part of Washington County. The two names appear to refer to the same precinct. Once again, clearly a simple change in polling place location in the unincorporated town of Glen Allan.
- iv) GREENVILLE INDUSTRIAL COLLEGE reports 14 votes for SD22 candidates and 393 for SD12, although the precinct is entirely in SD12. It was entirely in SD12 in 2003, 2011, and 2015 and reported votes accordingly. (In 2015 its name was changed to JAKE'S CHAPEL MB CHURCH.) Because it is entirely outside SD22, we excluded it from our analysis.
- c) Yazoo County:
 - i) BENTON PRECINCT: The issue noted in 2003 still existed in 2007.
 - ii) WARD 5 PRECINCT: This precinct was entirely in SD21 in 2003, according to both the MARIS 2001 precinct shapefile and the county's election recap report. In 2007, the recap report indicates a split has occurred, showing votes in both SD21 and SD22. The MARIS 2012 precinct shapefile does show a split of WARD 5, so for this election we used the MARIS 2012 boundary and indicate the precinct as split in our data.

3) 2011

We used the official MARIS 2001 precinct shapefile¹¹ as our source for boundary data, except where noted below.

- a) Bolivar, Humphreys, Sharkey, and Washington Counties: unchanged from 2007.
- b) Yazoo County: BENTON precinct now has all of its State Senate votes in SD21, and none in SD22.

4) 2015

We used the official MARIS 2012 precinct shapefile as our source for boundary data, except where noted.

- a) Humphreys and Sharkey Counties: Unchanged from 2011.

¹⁰ <http://www.covenantgreenville.org/>

¹¹ "2001 Voting Precincts" at <https://www.maris.state.ms.us/HTM/DownloadData/Statewide.html>

- b) Bolivar County:
 - i) Four precincts were affected by an election administration error involving incorrect ballots for Senate District 22¹² and we excluded them from analysis:
 - (1) NORTHWEST CLEVELAND voters were given ballots for the SD12, as reflected on the election recap report, which shows votes only for SD12 candidates. The precinct is in SD22.
 - (2) *Some* WEST CLEVELAND voters received ballots for SD12, which is reflected in the election recap report, where votes are recorded for both SD12 and SD22 candidates. The precinct is entirely within SD22.
 - (3) Voters in WEST CENTRAL CLEVELAND were given ballots for SD22 as reflected in the election recap report, which shows votes for candidates in SD12, SD13, and SD22. The precinct is entirely in SD13.
 - (4) STRINGTOWN voters were given ballots for SD22, as reflected in the election recap report, which shows votes only for SD22 candidates. The precinct is entirely in D12.
- c) Madison County: We used the Madison County GIS Shapefile vintage February 2014 provided to us by Madison County.
- d) Washington County:
 - i) ARCOLA CITY HALL is renamed ARCOLA TECHNOLOGY CENTER.
 - ii) SWIFTWATER BAPTIST CHURCH recorded 21 votes for candidates in SD22, though the precinct is entirely in SD12. (237 votes were recorded for the unopposed SD12 candidate.) Because the precinct is entirely outside SD22, we excluded it from our analysis.
- e) Yazoo County:
 - i) Yazoo County's GIS viewer shows a consolidation of HOLLY BLUFF and FAIRVIEW precincts.¹³ While FAIRVIEW still exists in the MARIS 2012 shapefile, it is not shown on the Yazoo County 2015 election recap, indicating that the consolidation occurred between 2012 and 2015. We concluded that FAIRVIEW was consolidated into HOLLY BLUFF for the 2015 election.
 - ii) WARD 4 and VALLEY are both split; the recap shows votes in Districts 22 & 23 for each. The MARIS 2012 shapefile shows both precincts entirely within District 22, but each is adjacent to a precinct in SD23 that does not appear in the 2015 election recap report:
 - (1) WARD 4 is adjacent to a precinct in the MARIS 2012 shapefile named DISTRICT 4 WARD 2, assigned to SD 23, which is not shown in the election recap. Because all other

¹² In a newspaper article, election officials acknowledged these errors. *Bolivar Commercial*, November 20 2015, "Senate lines obscure election" by Anne Preus. The article references the following information from a statement made by the Secretary of State's office:

According to the statement [from the Secretary of State's office], the following eligible voters may have voted in the wrong senate districts:

* West Central Cleveland Precinct — 607 voters are voting in Senate District 22 and should be voting in Senate District 13;

* Stringtown precinct — 47 voters are voting in Senate District 22 and should be voting in Senate District 12.

[...]

* Northwest Cleveland precinct — 1,087 voters are voting in Senate District 12 and should be voting in Senate District 22;

* West Cleveland precinct — 421 voters are voting in Senate District 12 and should be voting in Senate District 22.

¹³ <http://gis.cmpdd.org/yazoo/>

precincts in the election recap match precincts in the MARIS 2012 shapefile, with the exception of (2) below, we concluded that DISTRICT 4 WARD 2 was consolidated into WARD 4. We included this precinct in our analysis and indicate it as split.

- (2) VALLEY is adjacent to a precinct named TINSLEY, assigned to SD 23, which is likewise not shown on the election recap. As with (1) above, we concluded that TINSLEY was consolidated into VALLEY, and we included this precinct in our analysis, indicated as split.

EXHIBIT 3

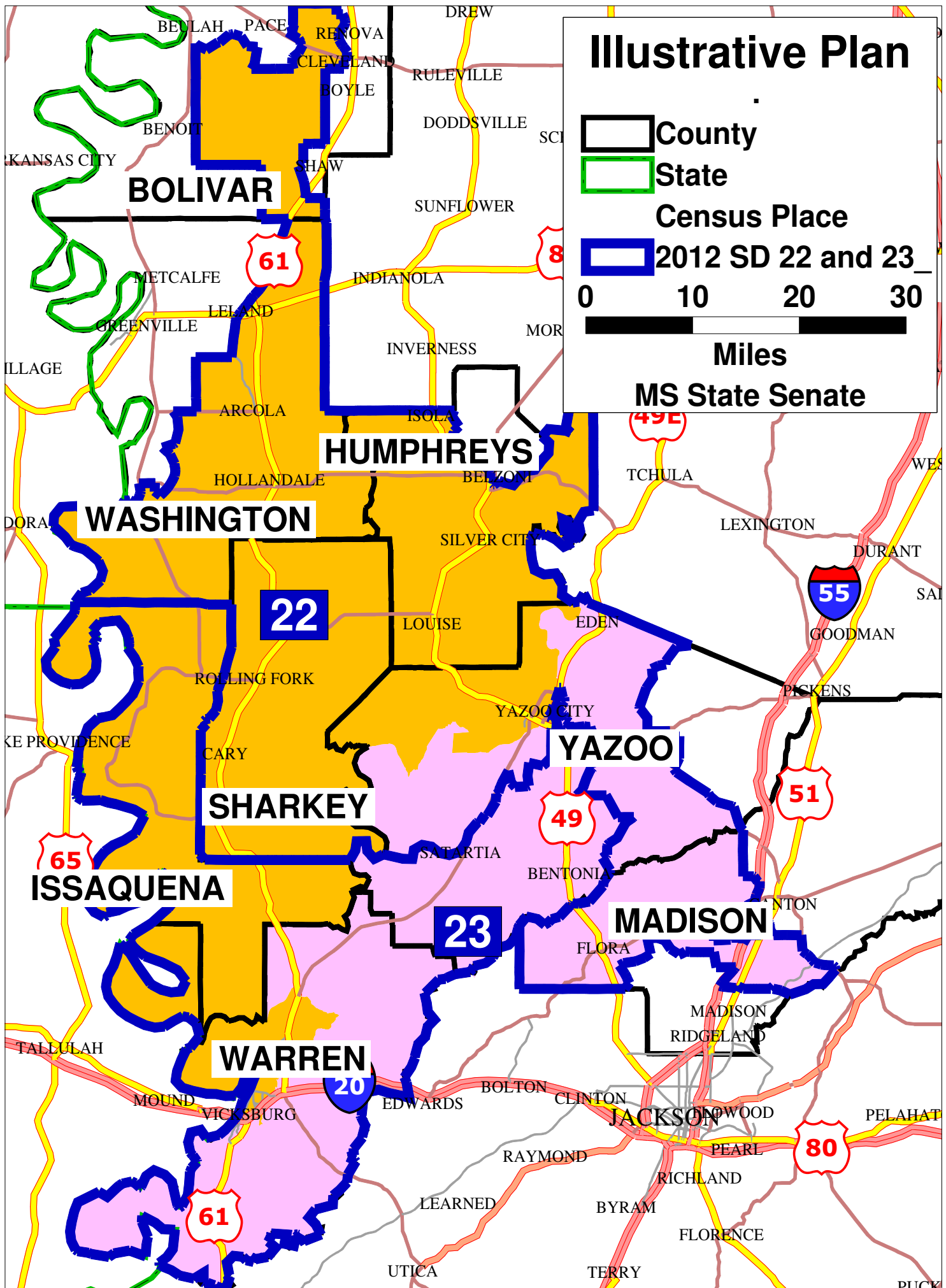


EXHIBIT 4

Mississippi State Senate Districts

**BENCHMARK PLAN
2002 Geography
With 2010 Population**

Report Date: 02/26/2011

BENCHMARK SENATE SUMMARY

POPULATION OF DISTRICTS - PLAN BENCHMARKSENATE

Plan Geography: Statewide

Precinct Year: 2008

Total Plan Population:
2,967,297Number of Districts:
52Ideal District Size:
57,063

Summary Statistics

	DISTRICT	TOTAL	DEVN	% DEVN.
Highest Deviation:	19	82,994	25,931	45.44
Highest Deviation:	1	78,258	21,195	37.14
Highest Deviation:	25	72,122	15,059	26.39
Lowest Deviation:	13	46,404	-10,659	-18.68
Lowest Deviation:	24	45,527	-11,536	-20.22
Lowest Deviation:	12	43,572	-13,491	-23.64

DISTRICTS WITH 50 PERCENT OR MORE BLACK POPULATION

DISTRICT	TOTAL	DEVN	% DEVN.	Black	%Black	[18+_Pop]	[18+_Blk]	%18+Blk
11	48,319	-8,744	-15.32	34,115	70.60%	34,384	22,918	66.65%
12	43,572	-13,491	-23.64	34,736	79.72%	31,052	23,849	76.80%
13	46,404	-10,659	-18.68	34,742	74.87%	34,512	24,793	71.84%
16	49,681	-7,382	-12.94	32,065	64.54%	37,166	22,751	61.21%
21	51,160	-5,903	-10.34	35,601	69.59%	36,529	24,166	66.16%
22	48,806	-8,257	-14.47	26,124	53.53%	37,392	18,630	49.82%
24	45,527	-11,536	-20.22	36,330	79.80%	33,112	25,283	76.36%
26	48,347	-8,716	-15.27	36,597	75.70%	35,541	26,196	73.71%
27	48,068	-8,995	-15.76	37,117	77.22%	36,010	27,020	75.03%
28	52,105	-4,958	-8.69	46,651	89.53%	35,769	31,153	87.09%
29	65,135	8,072	14.15	35,632	54.70%	48,251	24,303	50.37%
32	49,900	-7,163	-12.55	33,814	67.76%	36,632	23,601	64.43%
36	50,974	-6,089	-10.67	32,772	64.29%	38,915	24,264	62.35%
38	52,716	-4,347	-7.62	34,348	65.16%	38,538	24,227	62.87%

DISTRICTS WITH 50 PERCENT OR MORE THAT DID NOT HAVE 50% IN 2002

DISTRICT	TOTAL	DEVN	% DEVN.	Black	%Black	[18+_Pop]	[18+_Blk]	%18+Blk
22	48,806	-8,257	-14.47	26,124	53.53%	37,392	18,630	49.82%
29	65,135	8,072	14.15	35,632	54.70%	48,251	24,303	50.37%

TOTAL POPULATION BY DISTRICT

DISTRICT	TOTAL	DEVN	% DEVN.	Black	%Black	[18+_Pop]	[18+_Blk]	%18+Blk
1	78,258	21,195	37.14	16,984	21.70%	56,240	11,165	19.85%
2	57,319	256	0.45	22,256	38.83%	43,587	16,347	37.50%
3	59,708	2,645	4.64	8,727	14.62%	43,997	6,125	13.92%
4	56,514	-549	-0.96	6,353	11.24%	42,838	4,416	10.31%
5	55,465	-1,598	-2.80	4,582	8.26%	42,558	3,470	8.15%

6	59,938	2,875	5.04	10,493	17.51%	44,516	7,056	15.85%
7	52,118	-4,945	-8.67	16,500	31.66%	39,051	11,688	29.93%
8	52,845	-4,218	-7.39	22,328	42.25%	38,771	15,391	39.70%
9	65,085	8,022	14.06	19,053	29.27%	51,876	13,824	26.65%
10	60,426	3,363	5.89	24,909	41.22%	44,524	17,156	38.53%
11	48,319	-8,744	-15.32	34,115	70.60%	34,384	22,918	66.65%
12	43,572	-13,491	-23.64	34,736	79.72%	31,052	23,849	76.80%
13	46,404	-10,659	-18.68	34,742	74.87%	34,512	24,793	71.84%
14	55,962	-1,101	-1.93	24,698	44.13%	42,174	17,469	41.42%
15	57,328	265	0.46	14,158	24.70%	46,048	10,607	23.03%
16	49,681	-7,382	-12.94	32,065	64.54%	37,166	22,751	61.21%
17	51,767	-5,296	-9.28	19,080	36.86%	38,921	13,229	33.99%
18	60,602	3,539	6.20	18,415	30.39%	42,995	11,972	27.85%
19	82,994	25,931	45.44	18,282	22.03%	59,387	11,837	19.93%
20	68,638	11,575	20.28	9,142	13.32%	50,847	6,312	12.41%
21	51,160	-5,903	-10.34	35,601	69.59%	36,529	24,166	66.16%
22	48,806	-8,257	-14.47	26,124	53.53%	37,392	18,630	49.82%
23	51,680	-5,383	-9.43	24,006	46.45%	38,411	16,604	43.23%
24	45,527	-11,536	-20.22	36,330	79.80%	33,112	25,283	76.36%
25	72,122	15,059	26.39	22,392	31.05%	54,287	15,805	29.11%
26	48,347	-8,716	-15.27	36,597	75.70%	35,541	26,196	73.71%
27	48,068	-8,995	-15.76	37,117	77.22%	36,010	27,020	75.03%
28	52,105	-4,958	-8.69	46,651	89.53%	35,769	31,153	87.09%
29	65,135	8,072	14.15	35,632	54.70%	48,251	24,303	50.37%
30	67,810	10,747	18.83	14,803	21.83%	51,233	10,843	21.16%
31	57,968	905	1.59	17,536	30.25%	42,866	12,289	28.67%
32	49,900	-7,163	-12.55	33,814	67.76%	36,632	23,601	64.43%
33	56,120	-943	-1.65	20,147	35.90%	42,760	14,131	33.05%
34	55,501	-1,562	-2.74	22,684	40.87%	41,240	15,863	38.47%
35	55,228	-1,835	-3.22	18,225	33.00%	40,691	12,582	30.92%
36	50,974	-6,089	-10.67	32,772	64.29%	38,915	24,264	62.35%
37	55,722	-1,341	-2.35	21,779	39.09%	43,155	15,573	36.09%
38	52,716	-4,347	-7.62	34,348	65.16%	38,538	24,227	62.87%
39	56,401	-662	-1.16	17,408	30.86%	41,638	12,176	29.24%
40	62,702	5,639	9.88	13,564	21.63%	46,957	9,406	20.03%
41	56,638	-425	-0.74	21,691	38.30%	42,222	15,360	36.38%
42	57,263	200	0.35	12,379	21.62%	42,875	8,342	19.46%
43	62,195	5,132	8.99	13,843	22.26%	46,414	10,122	21.81%
44	71,264	14,201	24.89	16,386	22.99%	52,393	11,045	21.08%
45	57,871	808	1.42	13,561	23.43%	45,446	9,771	21.50%
46	56,319	-744	-1.30	4,327	7.68%	42,731	3,095	7.24%
47	58,112	1,049	1.84	21,704	37.35%	43,487	15,697	36.10%
48	51,159	-5,904	-10.35	19,946	38.99%	37,630	13,632	36.23%
49	59,022	1,959	3.43	10,578	17.92%	45,225	7,263	16.06%
50	51,017	-6,046	-10.60	8,023	15.73%	39,034	5,613	14.38%
51	62,901	5,838	10.23	6,496	10.33%	47,174	4,481	9.50%
52	56,601	-462	-0.81	10,303	18.20%	41,740	6,588	15.78%

Plan: senate_bench02geo10pop
 Plan Type:
 Administrator
 User:

Plan Components Report

Saturday, February 26, 2011

4:09 PM

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 1				
DeSoto MS County				
VTD: Aldens	4,595	1,084	3,459	760
VTD: Alphaba Cockrum	1,533	64	1,108	54
VTD: Bridgetown <i>(part)</i>	3,253	303	2,461	223
VTD: DeSoto Central <i>(part)</i>	7,913	1,976	5,407	1,242
VTD: Endora	2,991	257	2,300	190
VTD: Hernando Central	4,681	435	3,320	298
VTD: Hernando East <i>(part)</i>	7,549	477	5,544	348
VTD: Hernando West	4,362	977	3,158	719
VTD: Horn Lake Central	3,122	754	2,230	481
VTD: Horn Lake East <i>(part)</i>	4,432	1,672	3,053	1,034
VTD: Horn Lake Intermediate School	4,643	1,502	3,173	917
VTD: Horn Lake North <i>(part)</i>	3,640	1,406	2,419	836
VTD: Horn Lake South	4,277	800	3,309	554
VTD: Horn Lake West	4,834	1,585	3,243	931
VTD: Ingram's Mill <i>(part)</i>	2,437	492	1,795	386
VTD: Lake Cormorant	1,119	208	800	140
VTD: Lewisburg West <i>(part)</i>	0	0	0	0
VTD: Love	2,093	211	1,637	159
VTD: Nesbit East	1,577	465	1,214	358
VTD: Nesbit West	2,743	427	2,121	353
VTD: Oak Grove	565	50	419	42
VTD: Southhaven West <i>(part)</i>	3	0	2	0
VTD: Walls	5,896	1,839	4,068	1,140
DeSoto MS County Subtotal	78,258	16,984	56,240	11,165
District 1 Subtotal	78,258	16,984	56,240	11,165
District 2				
Benton MS County	8,729	3,252	6,572	2,322
Marshall MS County	37,144	17,439	28,441	12,909
Tippah MS County				
VTD: Blue Mountain	2,101	539	1,561	367
VTD: Brownfield	346	25	258	16
VTD: Chalybeate	1,336	20	973	13
VTD: Clarysville	273	3	218	2
VTD: Cotton Plant	640	318	476	244
VTD: Dry Creek	654	0	495	0
VTD: Dumas	884	4	663	3
VTD: Mitchell	446	23	337	18
VTD: New Hope	466	37	358	25
VTD: North Falkner	451	89	326	62
VTD: Palmer <i>(part)</i>	636	64	477	42

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 2 (continued)				
Tippah MS County (continued)				
VTD: Pine Grove	389	0	282	0
VTD: Providence <i>(part)</i>	200	44	155	31
VTD: Shady Grove	272	0	192	0
VTD: Threeforks	594	5	450	4
VTD: Tiplersville	581	241	467	185
VTD: Walnut	1,177	153	886	104
Tippah MS County Subtotal	11,446	1,565	8,574	1,116
District 2 Subtotal	57,319	22,256	43,587	16,347
District 3				
Calhoun MS County				
VTD: Banner	847	45	671	33
VTD: Bruce 3	1,527	218	1,199	164
VTD: NE Calhoun <i>(part)</i>	2,866	923	2,085	629
VTD: Pittsboro 1 <i>(part)</i>	49	37	37	27
VTD: Pittsboro 2 <i>(part)</i>	0	0	0	0
Calhoun MS County Subtotal	5,289	1,223	3,992	853
Pontotoc MS County				
VTD: Algoma	875	140	631	103
VTD: Bankhead	976	264	731	197
VTD: Beckham	1,177	103	858	79
VTD: Bethel <i>(part)</i>	3	0	3	0
VTD: Buchanan	1,203	47	847	27
VTD: Cherry Creek	1,173	68	827	43
VTD: Ecu	1,442	158	1,027	120
VTD: Friendship	920	71	679	47
VTD: Hoyle <i>(part)</i>	1,186	390	906	296
VTD: Hurricane	855	7	661	4
VTD: Judah	554	2	404	2
VTD: Longview <i>(part)</i>	80	69	61	51
VTD: North Randolph	658	3	462	2
VTD: Oak Hill	512	51	374	36
VTD: Pontotoc 1	364	30	266	16
VTD: Pontotoc 2	1,395	169	933	93
VTD: Pontotoc 3	1,664	267	1,208	158
VTD: Pontotoc 4	1,410	301	1,002	219
VTD: Pontotoc 5	3,790	807	2,784	552
VTD: Robbs	459	32	350	20
VTD: South Randolph	608	8	419	6
VTD: Springville	1,109	115	783	79
VTD: Thaxton	973	80	724	58
VTD: Toccopola	471	22	348	17
VTD: Troy	1,190	137	883	96
VTD: Turnpike	784	32	594	25
VTD: Woodland	429	18	326	13
VTD: Zion	1,025	178	770	136
Pontotoc MS County Subtotal	27,285	3,569	19,861	2,495
Union MS County	27,134	3,935	20,144	2,777
District 3 Subtotal	59,708	8,727	43,997	6,125

Plan: senate_bench02geo10pop

Administrator:

Type:

User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 4				
Alcorn MS County	37,057	4,221	28,036	2,928
Tippah MS County				
VTD: Chapman	641	3	482	2
VTD: Falkner	1,388	114	1,018	76
VTD: North Ripley	2,863	653	2,106	457
VTD: Palmer <i>(part)</i>	180	49	141	39
VTD: Peoples	285	28	232	23
VTD: Providence <i>(part)</i>	218	1	163	1
VTD: Ripley	2,533	679	1,899	484
VTD: S.W. Ripley	2,303	452	1,684	292
VTD: Spout Springs	375	0	290	0
Tippah MS County Subtotal	10,786	1,979	8,015	1,374
Tishomingo MS County				
VTD: Burnsville	788	0	618	0
VTD: Coles Mill	905	2	748	2
VTD: East Iuka <i>(part)</i>	4	0	4	0
VTD: Hubbard-Salem	250	2	208	1
VTD: Luka	1,614	59	1,269	42
VTD: North Burnsville	1,202	1	877	1
VTD: North Iuka	2,081	54	1,602	37
VTD: Spring Hill <i>(part)</i>	0	0	0	0
VTD: West Burnsville	1,035	5	780	2
VTD: West Iuka <i>(part)</i>	792	30	681	29
Tishomingo MS County Subtotal	8,671	153	6,787	114
District 4 Subtotal	56,514	6,353	42,838	4,416
District 5				
Itawamba MS County				
VTD: Armory	1,380	66	1,041	35
VTD: Bounds	76	0	57	0
VTD: Centerville	697	34	526	30
VTD: Clay	1,381	11	1,060	11
VTD: Copeland	993	1	739	1
VTD: Dorsey	1,048	3	788	3
VTD: Fawn Grove	1,065	3	785	3
VTD: Friendship	827	17	615	10
VTD: Fulton Dist.1 Courthouse	1,376	237	1,222	234
VTD: Fulton Dist.4 Am. Legion	2,378	144	1,924	102
VTD: Fulton Dist.5 Firestation	897	169	705	130
VTD: Kirkville	1,153	0	869	0
VTD: Mantachie	1,840	27	1,394	16
VTD: Mt. Gilead	304	0	223	0
VTD: Oakland	265	8	199	3
VTD: Ozark	187	0	136	0
VTD: Pineville	1,476	0	1,152	0
VTD: Pleasanton	256	0	196	0
VTD: Ratliff	456	0	333	0
VTD: Ryan	667	0	521	0
VTD: Tilden	545	8	414	8
Itawamba MS County Subtotal	19,267	728	14,899	586

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 5 (continued)				
Prentiss MS County	25,276	3,488	19,391	2,600
Tishomingo MS County				
VTD: Belmont	1,256	8	940	7
VTD: Cotton Springs	483	0	374	0
VTD: Dennis	513	7	358	3
VTD: East Belmont	808	2	596	1
VTD: East Iuka (part)	2,089	67	1,580	56
VTD: Golden	1,075	19	812	11
VTD: North Belmont	766	10	540	7
VTD: Paden	622	3	488	3
VTD: Spring Hill (part)	971	17	753	10
VTD: Tishomingo	1,506	189	1,176	153
VTD: West Iuka (part)	3	0	2	0
VTD: West Tishomingo	830	44	649	33
Tishomingo MS County Subtotal	10,922	366	8,268	284
District 5 Subtotal	55,465	4,582	42,558	3,470
District 6				
Lee MS County				
VTD: Auburn	2,571	49	1,935	32
VTD: Baldwin	1,483	575	1,177	431
VTD: Beech Springs	1,214	255	959	186
VTD: Belden	3,106	748	2,325	526
VTD: Birmingham Ridge	1,903	136	1,378	92
VTD: Bissell	5,342	508	4,109	353
VTD: Blair	2,109	294	1,510	212
VTD: Corrona	628	0	454	0
VTD: Davis Box	330	138	246	96
VTD: East Heights	721	79	559	52
VTD: Eggville	629	3	491	3
VTD: Euclautubba	537	5	400	3
VTD: Fellowship	1,316	54	948	33
VTD: Flowerdale	777	42	560	39
VTD: Friendship	413	20	315	13
VTD: Gilvo 1	231	10	189	8
VTD: Gilvo 5	310	5	242	4
VTD: Guntown	1,782	287	1,278	190
VTD: Hebron	786	8	599	5
VTD: Mooreville 1	1,990	28	1,391	20
VTD: Mooreville 5	961	15	737	12
VTD: Oak Hill	2,949	446	2,263	315
VTD: Palmetto A & B (part)	51	37	31	20
VTD: Pratts	699	35	527	22
VTD: Saltillo	4,608	367	3,304	239
VTD: Tupelo 1	781	4	598	4
VTD: Tupelo 2	6,147	1,450	4,520	921
VTD: Tupelo 3	8,374	2,622	6,183	1,677
VTD: Tupelo 4 North (part)	913	607	642	387
VTD: Tupelo 5 (part)	2,471	1,093	1,840	747
VTD: Unity	1,134	11	790	7

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 6 (continued)				
Lee MS County Subtotal	57,266	9,931	42,500	6,649
Pontotoc MS County				
VTD: Bethel <i>(part)</i>	1,319	221	984	165
VTD: Hoyle <i>(part)</i>	62	57	49	46
VTD: Longview <i>(part)</i>	469	172	363	130
VTD: Sherman	822	112	620	66
Pontotoc MS County Subtotal	2,672	562	2,016	407
District 6 Subtotal	59,938	10,493	44,516	7,056
District 7				
Itawamba MS County				
VTD: Bigbee Fork	314	7	225	5
VTD: Cardsville	343	5	266	5
VTD: Carolina	679	82	519	60
VTD: Evergreen	722	256	531	179
VTD: Greenwood	758	244	545	166
VTD: Hampton	82	1	71	1
VTD: James Creek	139	0	114	0
VTD: New Salem	273	59	208	51
VTD: Tremont	513	7	384	5
VTD: Turon	134	0	106	0
VTD: Wigginton	177	2	133	2
Itawamba MS County Subtotal	4,134	663	3,102	474
Lee MS County				
VTD: Brewer	689	50	540	33
VTD: Kedron	939	230	703	180
VTD: Nettleton	1,787	224	1,322	159
VTD: Petersburg	658	83	484	61
VTD: Plantersville	1,884	813	1,485	611
VTD: Richmond	935	109	706	89
VTD: Tupelo 4 North <i>(part)</i>	4,001	2,832	2,723	1,838
VTD: Tupelo 5 <i>(part)</i>	102	76	79	58
Lee MS County Subtotal	10,995	4,417	8,042	3,029
Monroe MS County	36,989	11,420	27,907	8,185
District 7 Subtotal	52,118	16,500	39,051	11,688
District 8				
Calhoun MS County				
VTD: Calhoun City 1	2,443	826	1,872	576
VTD: Calhoun City 4 <i>(part)</i>	717	173	552	123
VTD: Derma 4 <i>(part)</i>	613	278	416	157
VTD: Derma 5 <i>(part)</i>	936	257	713	179
VTD: NE Calhoun <i>(part)</i>	537	94	411	72
VTD: Pittsboro 1 <i>(part)</i>	678	448	513	339
VTD: Pittsboro 2 <i>(part)</i>	610	163	479	117
VTD: Vardaman <i>(part)</i>	2,177	458	1,545	341
Calhoun MS County Subtotal	8,711	2,697	6,501	1,904
Chickasaw MS County	17,392	7,319	12,820	5,114
Grenada MS County				
VTD: Elliott	1,012	178	716	96

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 8 (continued)				
Grenada MS County (continued)				
VTD: Futeyville	1,291	304	964	222
VTD: Gore Springs	650	188	500	146
VTD: Grenada Box 1	1,256	114	957	76
VTD: Grenada Box 2	1,842	1,190	1,386	846
VTD: Grenada Box 3 (part)	1,000	666	755	508
VTD: Grenada Box 4 (part)	267	227	190	166
VTD: Grenada Box 5 (part)	2,521	647	1,953	455
VTD: Hardy	719	35	546	28
VTD: Mt. Nebo	312	39	253	27
VTD: Pleasant Grove	850	428	687	341
VTD: Providence	373	25	281	19
VTD: Tie Plant (part)	0	0	0	0
Grenada MS County Subtotal	12,093	4,041	9,188	2,930
Lee MS County				
VTD: Old Union	1,010	458	736	314
VTD: Palmetto A & B (part)	3,310	1,361	2,303	837
VTD: Pleasant Grove (28081401)	1,918	900	1,434	667
VTD: Shannon	1,353	608	961	423
VTD: Tupelo 4 South	4,086	3,254	2,656	2,076
VTD: Verona	2,972	1,690	2,172	1,126
Lee MS County Subtotal	14,649	8,271	10,262	5,443
District 8 Subtotal	52,845	22,328	38,771	15,391
District 9				
Lafayette MS County	47,351	11,201	38,591	8,346
Tallahatchie MS County				
VTD: Blue Cane	99	80	70	52
VTD: Brazil	131	65	93	44
VTD: Charleston Beat 1	1,551	977	1,079	617
VTD: Charleston Beat 2 (part)	1,630	1,199	1,182	823
VTD: Enid	600	196	461	144
VTD: Sumner Beat 2 (part)	0	0	0	0
VTD: Teasdale	613	157	457	105
VTD: Tippo (part)	242	212	163	140
VTD: Webb Beat 2 (part)	190	161	124	104
Tallahatchie MS County Subtotal	5,056	3,047	3,629	2,029
Yalobusha MS County	12,678	4,805	9,656	3,449
District 9 Subtotal	65,085	19,053	51,876	13,824
District 10				
Panola MS County	34,707	16,875	25,363	11,430
Tate MS County				
VTD: Arkabutla (part)	133	17	95	13
VTD: Coldwater	2,878	1,648	2,129	1,173
VTD: Independence	3,396	756	2,524	544
VTD: Looxahoma	1,496	629	1,104	448
VTD: Palestine	740	40	538	28
VTD: Poagville 4	1,455	206	1,121	152
VTD: Poagville 5	547	141	414	118

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 10 (continued)				
Tate MS County (continued)				
VTD: Sarah (part)	415	16	295	14
VTD: Senatobia 3	1,152	914	797	622
VTD: Senatobia No.1	4,594	1,046	3,404	704
VTD: Senatobia No.2	3,941	1,386	3,002	992
VTD: Senatobia No.4	983	186	769	148
VTD: Sherrod	727	56	549	49
VTD: Strayhorn (part)	903	107	644	75
VTD: Taylor (part)	478	231	361	173
VTD: Thyatira	669	177	487	120
VTD: Tyro	736	289	566	210
VTD: Wyatte	476	189	362	143
Tate MS County Subtotal	25,719	8,034	19,161	5,726
District 10 Subtotal	60,426	24,909	44,524	17,156
District 11				
Coahoma MS County	26,151	19,752	18,487	13,264
Quitman MS County	8,223	5,724	6,070	4,000
Tate MS County				
VTD: Arkabutla (part)	1,634	579	1,186	376
VTD: Evansville	380	75	284	57
VTD: Sarah (part)	0	0	0	0
VTD: Strayhorn (part)	1,153	67	796	35
VTD: Taylor (part)	0	0	0	0
Tate MS County Subtotal	3,167	721	2,266	468
Tunica MS County	10,778	7,918	7,561	5,186
District 11 Subtotal	48,319	34,115	34,384	22,918
District 12				
Bolivar MS County				
VTD: Benoit (part)	893	648	626	419
VTD: Beulah	410	354	281	234
VTD: Cleveland Courthouse	627	62	518	36
VTD: Duncan/Alligator	787	563	589	396
VTD: East Central Cleveland	782	779	552	549
VTD: East Rosedale	1,362	1,233	914	811
VTD: Gunnison	797	566	560	365
VTD: Merigold	659	291	488	211
VTD: Mound Bayou (part)	2,590	2,517	1,893	1,833
VTD: North Cleveland	1,656	1,298	1,151	885
VTD: Northwest Cleveland	1,672	89	1,344	70
VTD: Pace (part)	665	526	515	399
VTD: Scott	301	156	234	124
VTD: Shelby	2,360	2,195	1,597	1,456
VTD: West Central Cleveland (part)	174	64	121	37
VTD: West Rosedale	586	428	458	327
VTD: Winstonville	122	92	100	77
Bolivar MS County Subtotal	16,443	11,861	11,941	8,229
Washington MS County				
VTD: American Legion	3,192	2,561	2,227	1,680

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	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 12 (continued)				
Washington MS County (continued)				
VTD: Brent Center	1,755	1,721	1,209	1,187
VTD: Buster Brown Comm. Center <i>(part)</i>	3,563	2,861	2,432	1,843
VTD: Christ Wesleyan Methodist Church <i>(part)</i>	408	80	330	63
VTD: Darlove Baptist Church <i>(part)</i>	0	0	0	0
VTD: Elks Club	4,714	4,276	3,313	2,954
VTD: Extension Building	2,182	2,121	1,492	1,447
VTD: Grace Methodist Church <i>(part)</i>	3,415	2,536	2,454	1,687
VTD: Greenville Ind. College	3,024	2,931	2,238	2,153
VTD: Metcalfe City Hall	1,069	1,018	697	666
VTD: Potter House Church	1,689	1,593	1,177	1,095
VTD: St. James Epis. Church <i>(part)</i>	1,065	978	779	713
VTD: Swiftwater Baptist Church <i>(part)</i>	655	79	484	62
VTD: Tampa Drive <i>(part)</i>	398	120	279	70
Washington MS County Subtotal	27,129	22,875	19,111	15,620
District 12 Subtotal	43,572	34,736	31,052	23,849
District 13				
Bolivar MS County				
VTD: Boyle	3,202	1,662	2,337	1,162
VTD: Cleveland Eastgate	1,249	1,217	886	857
VTD: East Cleveland	2,917	2,482	2,241	1,841
VTD: Mound Bayou <i>(part)</i>	93	3	72	3
VTD: Renova	396	363	285	264
VTD: Shaw	2,401	1,993	1,807	1,448
VTD: Skene <i>(part)</i>	0	0	0	0
VTD: South Cleveland	1,037	929	660	570
Bolivar MS County Subtotal	11,295	8,649	8,288	6,145
Humphreys MS County				
VTD: Central Belzoni	2,046	1,385	1,500	952
VTD: Four Mile	152	42	115	28
VTD: North Belzoni	1,424	1,209	998	826
VTD: Northwest Belzoni	524	512	362	352
VTD: Southeast Belzoni	848	819	499	476
VTD: Southwest Belzoni	665	647	447	436
Humphreys MS County Subtotal	5,659	4,614	3,921	3,070
Sunflower MS County	29,450	21,479	22,303	15,578
District 13 Subtotal	46,404	34,742	34,512	24,793
District 14				
Attala MS County				
VTD: Aponaug <i>(part)</i>	3	0	3	0
VTD: Carmack	430	4	328	3
VTD: East <i>(part)</i>	1,701	422	1,269	277
VTD: Hesterville	506	38	375	27
VTD: North Central	573	86	410	62
VTD: Northeast <i>(part)</i>	2,352	1,732	1,638	1,181
VTD: Northwest <i>(part)</i>	2,269	1,173	1,570	735
VTD: Possumneck <i>(part)</i>	416	170	314	119
VTD: Providence <i>(part)</i>	618	81	495	62

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District 14 (continued)				
Attala MS County (continued)				
VTD: South Central (part)	1,863	772	1,373	546
VTD: Southwest (part)	46	35	30	23
VTD: Williamsville	2,002	656	1,535	495
VTD: Zama	561	147	430	106
Attala MS County Subtotal	13,340	5,316	9,770	3,636
Carroll MS County	10,597	3,461	8,314	2,600
Grenada MS County				
VTD: Geeslin	1,056	164	825	130
VTD: Grenada Box 3 (part)	1,704	1,326	1,240	939
VTD: Grenada Box 4 (part)	2,553	2,064	1,898	1,510
VTD: Grenada Box 5 (part)	405	108	305	77
VTD: Holcomb	1,479	355	1,094	258
VTD: Sweethome	631	208	485	160
VTD: Tie Plant (part)	1,985	874	1,480	608
Grenada MS County Subtotal	9,813	5,099	7,327	3,682
Leflore MS County				
VTD: Central Greenwood (part)	328	87	243	48
VTD: Money (part)	102	49	81	38
VTD: North Greenwood (part)	5,562	966	4,354	656
VTD: Northeast Greenwood	2,780	1,997	1,956	1,286
VTD: Schlater (part)	0	0	0	0
VTD: South Greenwood (part)	0	0	0	0
VTD: Southeast Greenwood	4,502	3,638	3,422	2,655
VTD: West Greenwood (part)	189	58	168	54
Leflore MS County Subtotal	13,463	6,795	10,224	4,737
Montgomery MS County				
VTD: Duck Hill (part)	936	389	719	290
VTD: East Winona	1,025	769	685	483
VTD: Kilmichael (part)	656	455	478	318
VTD: Lodi (part)	0	0	0	0
VTD: Mt. Pisgah (part)	23	0	17	0
VTD: North Duck Hill (part)	282	187	211	138
VTD: North Kilmicheal (part)	171	141	125	98
VTD: North Winona (part)	1,803	330	1,415	236
VTD: South Winona	1,698	1,200	1,235	853
VTD: West Winona	1,377	406	1,035	287
Montgomery MS County Subtotal	7,971	3,877	5,920	2,703
Tallahatchie MS County				
VTD: Cascilla	372	52	305	44
VTD: Leverette (part)	195	92	144	61
VTD: Rosebloom	211	6	170	6
Tallahatchie MS County Subtotal	778	150	619	111
District 14 Subtotal	55,962	24,698	42,174	17,469
District 15				
Attala MS County				
VTD: Berea	258	32	189	26
VTD: East (part)	0	0	0	0

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 15 (continued)				
Attala MS County (continued)				
VTD: Ethel	730	247	553	176
VTD: Liberty Chapel	532	135	382	95
VTD: McCool	482	157	378	114
VTD: Northeast (part)	26	1	18	1
VTD: Providence (part)	16	1	15	1
VTD: Thompson	315	27	230	16
Attala MS County Subtotal	2,359	600	1,765	429
Calhoun MS County				
VTD: Calhoun City 4 (part)	258	51	209	47
VTD: Derma 4 (part)	331	42	245	31
VTD: Derma 5 (part)	373	136	276	96
VTD: Vardaman (part)	0	0	0	0
Calhoun MS County Subtotal	962	229	730	174
Choctaw MS County	8,547	2,574	6,470	1,867
Montgomery MS County				
VTD: Alva	86	36	68	24
VTD: Duck Hill (part)	33	15	31	14
VTD: Kilmichael (part)	925	492	704	350
VTD: Lodi (part)	355	288	281	225
VTD: Mt. Pisgah (part)	358	63	298	52
VTD: Nations	529	57	409	47
VTD: North Duck Hill (part)	4	0	4	0
VTD: North Kilmicheal (part)	23	21	19	17
VTD: North Mt. Pisgah - Sweethome	204	87	164	63
VTD: North Winona (part)	0	0	0	0
VTD: Poplar Creek	215	11	179	11
VTD: Southeast Winona	27	0	19	0
VTD: Stewart	195	20	159	14
Montgomery MS County Subtotal	2,954	1,090	2,335	817
Oktibbeha MS County				
VTD: Bell Schoolhouse (part)	10	0	10	0
VTD: Bradley	339	95	267	67
VTD: Center Grove	440	227	329	166
VTD: Central Starkville (part)	878	74	833	54
VTD: Craig Springs	256	14	205	6
VTD: Double Springs	427	41	345	28
VTD: East Starkville	3,236	715	3,125	693
VTD: Gillespie Street Center (part)	2,189	379	1,876	311
VTD: Maben	706	439	495	279
VTD: North Adaton (part)	409	153	328	117
VTD: North Longview	1,085	189	826	135
VTD: North Starkville 3 (part)	2,488	842	1,917	549
VTD: Northeast Starkville	3,273	659	3,114	648
VTD: Self Creek	577	89	451	63
VTD: South Adaton	614	186	454	125
VTD: South Longview	362	95	289	73
VTD: South Starkville (part)	6,089	1,355	4,839	926

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District 15 (continued)				
Oktibbeha MS County (continued)				
VTD: Sturgis	1,171	264	934	214
VTD: West Starkville (part)	6,575	1,597	5,549	1,279
Oktibbeha MS County Subtotal	31,124	7,413	26,186	5,733
Webster MS County	10,253	2,040	7,674	1,427
Winston MS County				
VTD: Fairground (part)	907	209	703	157
VTD: Mill Creek (part)	222	3	185	3
Winston MS County Subtotal	1,129	212	888	160
District 15 Subtotal	57,328	14,158	46,048	10,607
District 16				
Clay MS County	20,634	12,017	15,332	8,392
Lowndes MS County				
VTD: Artesia	599	456	430	325
VTD: Coleman B	212	203	152	146
VTD: Crawford A	1,532	1,254	1,102	878
VTD: Hunt A	2,570	2,448	1,835	1,750
VTD: Mitchell A	2,446	2,002	1,795	1,429
VTD: Mitchell B (part)	12	9	0	0
VTD: Plum Grove A	631	541	479	410
VTD: Plum Grove B	10	0	10	0
VTD: Plum Grove C	0	0	0	0
VTD: Propst Park Community Hut (part)	0	0	0	0
Lowndes MS County Subtotal	8,012	6,913	5,803	4,938
Noxubee MS County				
VTD: Brooksville (part)	2,294	1,580	1,683	1,113
VTD: Central District 3 (part)	41	17	30	11
VTD: Cliftonville	650	568	475	409
VTD: Noxubee Cnty Vo-Tech Cen. (part)	402	176	274	131
VTD: Prairie Point	898	681	633	488
VTD: Savannah (part)	203	95	157	80
Noxubee MS County Subtotal	4,488	3,117	3,252	2,232
Oktibbeha MS County				
VTD: Bell Schoolhouse (part)	495	328	377	242
VTD: Central Starkville (part)	2,228	1,664	1,641	1,156
VTD: Gillespie Street Center (part)	1,712	1,196	1,220	797
VTD: Hickory Grove	3,380	1,245	2,848	935
VTD: North Adaton (part)	17	0	14	0
VTD: North Starkville 2	1,757	1,083	1,381	832
VTD: North Starkville 3 (part)	762	323	600	227
VTD: Oktoc	1,055	762	835	584
VTD: Osborn	1,450	946	1,084	690
VTD: Sessums	1,353	949	1,032	685
VTD: South Starkville (part)	580	345	486	275
VTD: Southeast Oktibehha	338	193	246	140
VTD: West Starkville (part)	1,420	984	1,015	626
Oktibbeha MS County Subtotal	16,547	10,018	12,779	7,189
District 16 Subtotal	49,681	32,065	37,166	22,751

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District 17				
Lowndes MS County				
VTD: Air Base A	679	183	492	122
VTD: Air Base B	1,773	854	1,286	597
VTD: Air Base C	1,354	146	972	99
VTD: Air Base D	121	18	90	15
VTD: Air Base E	45	10	33	6
VTD: Brandon A	3,171	1,114	2,575	841
VTD: Brandon B	537	110	487	101
VTD: Brandon C	238	69	198	52
VTD: Brandon D	48	12	34	7
VTD: Caledonia	5,162	483	3,737	370
VTD: Coleman A	550	520	369	344
VTD: Columbus High School A	1,831	1,308	1,316	872
VTD: Columbus High School B	1,255	368	1,055	267
VTD: Columbus High School C	262	134	210	92
VTD: Columbus High School D	145	106	123	89
VTD: Dowdle Gas Training Center B	564	196	437	136
VTD: Faigrounds F	118	75	82	48
VTD: Faigrounds G	46	40	32	28
VTD: Fairgrounds A	2,213	2,086	1,302	1,206
VTD: Fairgrounds B	1,150	690	834	492
VTD: Fairgrounds C	1,317	1,065	823	613
VTD: Fairgrounds D	855	607	657	449
VTD: Fairgrounds E	169	138	126	100
VTD: Hunt B	276	276	221	221
VTD: Hunt C	143	129	102	90
VTD: Lee Middle School	4,921	818	3,899	581
VTD: Mitchell B <i>(part)</i>	228	208	173	160
VTD: New Hope A	2,955	249	2,146	164
VTD: New Hope B	2,385	355	1,708	245
VTD: New Hope C	1,595	261	1,264	200
VTD: New Hope D	386	19	297	12
VTD: New Hope E	165	48	122	36
VTD: New Hope F	0	0	0	0
VTD: Propst Park Community Hut <i>(part)</i>	1,157	1,017	906	778
VTD: Rural Hill A	2,209	605	1,623	390
VTD: Rural Hill B	1,181	255	889	185
VTD: Rural Hill C	216	10	164	7
VTD: Sale A	587	368	458	266
VTD: Sale B	293	137	251	103
VTD: Sale C	319	109	244	79
VTD: Steens A	917	103	697	80
VTD: Steens B	83	10	67	6
VTD: Steens C	878	249	663	175
VTD: Trinity A	1,005	583	802	414
VTD: Trinity B	832	476	631	294
VTD: Union Academy A	1,160	981	876	729
VTD: Union Academy B	504	371	384	271
VTD: Union Academy C	385	167	292	110
VTD: University A	1,748	495	1,473	364

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District 17 (continued)				
Lowndes MS County (continued)				
VTD: University B	73	48	60	36
VTD: West Lowndes A	944	263	743	185
VTD: West Lowndes B	619	138	496	102
Lowndes MS County Subtotal	51,767	19,080	38,921	13,229
District 17 Subtotal	51,767	19,080	38,921	13,229
District 18				
Leake MS County	23,805	9,654	16,443	6,058
Neshoba MS County	29,676	6,207	21,161	4,058
Winston MS County				
VTD: County Agent <i>(part)</i>	318	273	240	205
VTD: East Winston <i>(part)</i>	407	107	315	72
VTD: Lovorn Tractor <i>(part)</i>	623	357	470	248
VTD: Mars Hill	1,193	496	911	373
VTD: Nanih Waiya <i>(part)</i>	1,470	222	1,061	167
VTD: New National Guard Armory <i>(part)</i>	393	99	285	54
VTD: Noxapater	1,748	595	1,334	444
VTD: Shiloh <i>(part)</i>	510	219	408	162
VTD: Wathall	459	186	367	131
Winston MS County Subtotal	7,121	2,554	5,391	1,856
District 18 Subtotal	60,602	18,415	42,995	11,972
District 19				
DeSoto MS County				
VTD: Bridgetown <i>(part)</i>	0	0	0	0
VTD: Cherry Valley	2,612	327	1,900	179
VTD: DeSoto Central <i>(part)</i>	2,518	449	1,662	287
VTD: Elmore	1,543	210	1,242	138
VTD: Fairhaven	3,615	1,116	2,505	743
VTD: Greenbrook North	5,490	1,699	3,900	1,137
VTD: Greenbrook South	8,196	1,060	6,011	679
VTD: Hack's Cross	5,828	1,205	4,047	792
VTD: Hernando East <i>(part)</i>	0	0	0	0
VTD: Horn Lake East <i>(part)</i>	137	50	90	29
VTD: Horn Lake North <i>(part)</i>	1,821	748	1,198	469
VTD: Ingram's Mill <i>(part)</i>	0	0	0	0
VTD: Lewisburg East	820	45	609	25
VTD: Lewisburg West <i>(part)</i>	1,851	335	1,317	248
VTD: Miller	5,233	1,211	3,620	833
VTD: Mineral Wells	3,560	775	2,597	506
VTD: Olive Branch North	8,280	2,363	5,974	1,505
VTD: Olive Branch South	5,650	643	4,079	397
VTD: Olive Branch West	2,666	669	1,942	444
VTD: Pleasant Hill North	3,769	417	2,683	286
VTD: Pleasant Hill South	2,540	240	1,767	166
VTD: Plum Point	3,377	526	2,624	374
VTD: Southhaven North	5,203	1,171	3,707	650
VTD: Southhaven South	3,535	1,756	2,451	1,083
VTD: Southhaven West <i>(part)</i>	4,750	1,267	3,462	867

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 19 (continued)				
DeSoto MS County Subtotal	82,994	18,282	59,387	11,837
District 19 Subtotal	82,994	18,282	59,387	11,837
District 20				
Madison MS County				
VTD: Bear Creek <i>(part)</i>	598	168	401	110
VTD: Canton Precinct 3 <i>(part)</i>	21	11	15	5
VTD: Cedar Grove <i>(part)</i>	296	38	239	27
VTD: Cobblestone <i>(part)</i>	929	86	714	62
VTD: Highland Colony Bap. Ch. <i>(part)</i>	0	0	0	0
VTD: Madison 1	2,818	261	1,964	157
VTD: Madison 2	3,466	170	2,474	128
VTD: Madison 3 <i>(part)</i>	4,674	615	3,262	398
VTD: Main Harbor <i>(part)</i>	0	0	0	0
VTD: NorthBay	1,244	116	932	81
VTD: Trace Harbor <i>(part)</i>	2,134	114	1,588	69
VTD: Victory Baptist Church	1,724	103	1,244	71
Madison MS County Subtotal	17,904	1,682	12,833	1,108
Rankin MS County				
VTD: Castlewoods	4,306	475	3,140	312
VTD: Castlewoods West	2,600	260	2,050	191
VTD: East Crossgates <i>(part)</i>	3,066	180	2,423	112
VTD: Fannin	2,269	391	1,643	274
VTD: Flowood <i>(part)</i>	1,593	379	1,388	303
VTD: Grant's Ferry	5,213	532	3,793	353
VTD: Holbrook	7,499	784	5,634	536
VTD: Leesburg	1,359	104	992	80
VTD: Liberty <i>(part)</i>	6	0	6	0
VTD: Mullins <i>(part)</i>	1,115	651	815	464
VTD: North Brandon <i>(part)</i>	0	0	0	0
VTD: North McLaurin <i>(part)</i>	4	0	3	0
VTD: Northeast Brandon <i>(part)</i>	2,004	524	1,440	365
VTD: Northshore	3,637	320	2,638	227
VTD: Oakdale	4,644	711	3,319	467
VTD: Pelahatchie	3,618	787	2,695	571
VTD: Pisgah	2,486	1,029	1,794	741
VTD: Reservoir East	2,234	81	1,782	48
VTD: Reservoir West	3,081	252	2,459	160
Rankin MS County Subtotal	50,734	7,460	38,014	5,204
District 20 Subtotal	68,638	9,142	50,847	6,312
District 21				
Attala MS County				
VTD: Aponaug <i>(part)</i>	489	125	370	98
VTD: McAdams	622	379	473	269
VTD: Newport	585	305	461	224
VTD: Northwest <i>(part)</i>	6	0	4	0
VTD: Possumneck <i>(part)</i>	2	0	2	0
VTD: Sallis	1,463	1,009	1,078	715
VTD: South Central <i>(part)</i>	59	4	52	1
VTD: Southwest <i>(part)</i>	639	470	503	354

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 21 (continued)				
Attala MS County Subtotal	3,865	2,292	2,943	1,661
Hinds MS County				
VTD: Pocahontas <i>(part)</i>	5	0	3	0
Hinds MS County Subtotal	5	0	3	0
Holmes MS County				
VTD: Beat 4 Walden Chapel <i>(part)</i>	42	42	24	24
VTD: Coxburg <i>(part)</i>	28	2	24	2
VTD: Ebenezer <i>(part)</i>	581	454	424	317
VTD: Pickens	1,418	1,219	1,024	872
Holmes MS County Subtotal	2,069	1,717	1,496	1,215
Madison MS County				
VTD: Bear Creek <i>(part)</i>	0	0	0	0
VTD: Bible Church	1,320	1,309	768	765
VTD: Camden	1,536	1,307	1,125	929
VTD: Cameron	162	96	133	75
VTD: Canton Precinct 1	2,807	2,097	2,044	1,437
VTD: Canton Precinct 2	2,656	1,514	1,981	1,047
VTD: Canton Precinct 3 <i>(part)</i>	462	274	333	177
VTD: Canton Precinct 4	2,863	2,557	1,984	1,742
VTD: Canton Precinct 5	2,194	2,146	1,438	1,408
VTD: Canton Precinct 7	475	441	383	354
VTD: Cedar Grove <i>(part)</i>	0	0	0	0
VTD: Couparle	86	68	72	56
VTD: Flora	1,907	552	1,408	377
VTD: Liberty	2,259	1,510	1,762	1,171
VTD: Luther Branson School	1,302	1,090	928	754
VTD: Mad. Co. Bap. Fam. Lf.Ct	2,088	1,984	1,259	1,183
VTD: Magnolia Heights	2,261	1,837	1,539	1,204
VTD: New Industrial Park	617	434	444	310
VTD: Ratliff Ferry	1,359	730	1,042	522
VTD: Sharon	1,098	940	826	684
VTD: Smith School	555	24	457	18
VTD: Virililia	409	107	342	79
Madison MS County Subtotal	28,416	21,017	20,268	14,292
Yazoo MS County				
VTD: 3-1 West	1,464	1,395	959	898
VTD: 3-2 East	1,493	1,209	1,078	839
VTD: 3-3 Jonestown	946	927	576	564
VTD: 3-4 South <i>(part)</i>	1,029	449	712	303
VTD: Benton	965	235	731	171
VTD: Center Ridge	866	63	655	46
VTD: Deasonville	824	536	618	377
VTD: District 4 Ward 2 <i>(part)</i>	79	0	61	0
VTD: Dover	631	97	460	77
VTD: East Benton	595	156	443	107
VTD: East Midway <i>(part)</i>	529	418	384	292
VTD: Fugates	721	372	572	279
VTD: Harttown	552	452	392	316
VTD: Lake City <i>(part)</i>	0	0	0	0

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 21 (continued)				
Yazoo MS County (continued)				
VTD: Robinette	798	59	622	52
VTD: Ward 2 (part)	1,292	684	862	389
VTD: Ward 5 (part)	3,142	2,968	2,064	1,905
VTD: West Bentonina	867	555	618	383
VTD: Zion (part)	12	0	12	0
Yazoo MS County Subtotal	16,805	10,575	11,819	6,998
District 21 Subtotal	51,160	35,601	36,529	24,166
District 22				
Bolivar MS County				
VTD: Benoit (part)	0	0	0	0
VTD: Choctaw	381	307	300	235
VTD: Longshot	188	77	154	62
VTD: Pace (part)	503	289	479	276
VTD: Skene (part)	563	83	443	59
VTD: Stringtown	114	45	89	36
VTD: West Central Cleveland (part)	966	82	770	49
VTD: West Cleveland	3,692	527	3,038	465
Bolivar MS County Subtotal	6,407	1,410	5,273	1,182
Humphreys MS County				
VTD: Gooden Lake	86	22	68	17
VTD: Isola	1,335	988	951	658
VTD: Lake City	107	14	92	13
VTD: Louise	845	621	643	463
VTD: Midnight	303	161	228	116
VTD: Putnam	292	85	245	69
VTD: Silver City	748	482	525	336
Humphreys MS County Subtotal	3,716	2,373	2,752	1,672
Sharkey MS County	4,916	3,490	3,660	2,501
Washington MS County				
VTD: Arcola City Hall	1,160	646	865	478
VTD: Buster Brown Comm. Center (part)	97	64	73	43
VTD: Christ Wesleyan Methodist Church (part)	3,578	1,666	2,616	1,078
VTD: Darlove Baptist Church (part)	226	74	170	58
VTD: Glen Allan Health Clinic	851	438	650	307
VTD: Grace Methodist Church (part)	66	4	58	4
VTD: Hollandale City Hall	2,991	2,500	2,158	1,735
VTD: Leland Health Dpt. Clinic	2,817	1,864	2,057	1,287
VTD: Leland Rotary Club	2,629	1,658	1,965	1,149
VTD: St. James Epis. Church (part)	3,586	1,900	2,657	1,250
VTD: Swiftwater Baptist Church (part)	669	25	507	21
VTD: Tampa Drive (part)	1,019	739	718	494
VTD: Wards Recreation Center	4,319	2,015	3,195	1,327
Washington MS County Subtotal	24,008	13,593	17,689	9,231
Yazoo MS County				
VTD: Carter	71	32	57	23
VTD: District 4 Ward 2 (part)	5	0	5	0

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 22 (continued)				
Yazoo MS County (continued)				
VTD: East Midway <i>(part)</i>	1	0	1	0
VTD: Eden	559	121	419	88
VTD: Fairview <i>(part)</i>	0	0	0	0
VTD: Free Run	289	61	235	44
VTD: Holly Bluff	318	147	239	104
VTD: Lake City <i>(part)</i>	309	91	228	64
VTD: Ward 2 <i>(part)</i>	2	2	2	2
VTD: Ward 4	6,998	4,327	5,929	3,386
VTD: Ward 5 <i>(part)</i>	243	222	170	158
VTD: West Midway	274	61	230	42
VTD: Zion <i>(part)</i>	690	194	503	133
Yazoo MS County Subtotal	9,759	5,258	8,018	4,044
District 22 Subtotal	48,806	26,124	37,392	18,630
District 23				
Issaquena MS County	1,406	906	1,125	702
Warren MS County	48,773	22,920	36,135	15,755
Yazoo MS County				
VTD: 3-4 South <i>(part)</i>	0	0	0	0
VTD: Fairview <i>(part)</i>	69	23	59	21
VTD: Lake City <i>(part)</i>	0	0	0	0
VTD: Mechanicsburg	680	58	528	53
VTD: Satartia	148	39	122	32
VTD: Tinsley	452	41	327	28
VTD: Valley	152	19	115	13
Yazoo MS County Subtotal	1,501	180	1,151	147
District 23 Subtotal	51,680	24,006	38,411	16,604
District 24				
Holmes MS County				
VTD: Acona	992	913	680	619
VTD: Beat 4 Walden Chapel <i>(part)</i>	387	361	276	252
VTD: Coxburg <i>(part)</i>	289	104	219	71
VTD: Cruger	455	375	336	270
VTD: Durant	2,678	2,148	1,836	1,394
VTD: Ebenezer <i>(part)</i>	2	0	2	0
VTD: Goodman	1,879	1,479	1,426	1,048
VTD: Lexington Beat 1	2,368	2,139	1,595	1,405
VTD: Lexington Beat 4	2,614	2,291	1,879	1,599
VTD: Lexington Beat 5	585	271	449	181
VTD: Lexington East	612	537	453	389
VTD: Sandhill	91	16	69	10
VTD: Tchula	2,503	2,326	1,686	1,533
VTD: Thornton	716	644	510	443
VTD: West	958	697	709	497
Holmes MS County Subtotal	17,129	14,301	12,125	9,711
Leflore MS County				
VTD: Central Greenwood <i>(part)</i>	609	597	458	449
VTD: East Greenwood	2,909	2,835	1,970	1,902

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District 24 (continued)				
Leflore MS County (continued)				
VTD: Minter City	560	314	439	232
VTD: Money <i>(part)</i>	184	38	156	35
VTD: Morgan City/Swiftown	498	324	363	218
VTD: MVSU	1,316	1,112	1,192	1,040
VTD: North Greenwood <i>(part)</i>	135	125	87	78
VTD: North Itta Bena	3,006	2,583	2,132	1,771
VTD: Rising Sun	1,073	1,058	713	699
VTD: Schlater <i>(part)</i>	580	330	414	231
VTD: Sidon	776	625	525	390
VTD: South Greenwood <i>(part)</i>	1,645	1,616	1,126	1,107
VTD: South Itta Bena	977	851	645	542
VTD: Southwest Greenwood	2,215	1,956	1,377	1,208
VTD: West Greenwood <i>(part)</i>	2,371	2,183	1,745	1,601
Leflore MS County Subtotal	18,854	16,547	13,342	11,503
Tallahatchie MS County				
VTD: Charleston Beat 2 <i>(part)</i>	91	57	62	35
VTD: Charleston Beat 3	720	428	559	317
VTD: Glendora	938	823	652	560
VTD: Leverette <i>(part)</i>	183	62	142	43
VTD: Murphreesboro	412	87	321	69
VTD: Paynes	800	346	580	232
VTD: Philipp	337	185	273	144
VTD: Springhill	308	38	241	30
VTD: Sumner Beat 2 <i>(part)</i>	316	63	245	40
VTD: Sumner Beat 5	374	244	283	177
VTD: Tippo <i>(part)</i>	242	132	185	91
VTD: Tutwiler	3,677	1,988	3,286	1,613
VTD: Webb Beat 2 <i>(part)</i>	121	105	75	62
VTD: Webb Beat 4	320	261	227	177
VTD: Webb Beat 5	705	663	514	479
Tallahatchie MS County Subtotal	9,544	5,482	7,645	4,069
District 24 Subtotal	45,527	36,330	33,112	25,283
District 25				
Hinds MS County				
VTD: 32	1,238	162	993	78
VTD: 33	1,176	3	901	2
VTD: 34	2,242	51	1,715	34
VTD: 35	2,144	120	1,617	84
VTD: 36	1,671	1,018	1,269	712
VTD: 44	3,992	2,476	2,907	1,648
VTD: 45	2,553	254	2,060	194
VTD: 46	2,247	1,224	1,746	841
VTD: 78	4,029	1,542	3,333	1,158
VTD: 79	3,557	2,479	2,572	1,664
VTD: 80 <i>(part)</i>	0	0	0	0
Hinds MS County Subtotal	24,849	9,329	19,113	6,415
Madison MS County				
VTD: Bear Creek <i>(part)</i>	3,105	1,533	2,301	1,112

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District 25 (continued)				
Madison MS County (continued)				
VTD: Cobblestone (part)	1,763	285	1,355	194
VTD: Gluckstadt	10,393	1,555	7,163	1,041
VTD: Highland Colony Bap. Ch. (part)	3,851	683	2,798	501
VTD: Lorman-Cavalier (part)	82	67	66	54
VTD: Madison 3 (part)	9	0	7	0
VTD: Main Harbor (part)	1,709	62	1,455	46
VTD: Ridgeland 1	3,528	1,265	2,709	844
VTD: Ridgeland 3	4,333	2,640	3,210	1,880
VTD: Ridgeland 4	2,968	1,417	2,392	1,057
VTD: Ridgeland First Meth. Ch.	3,570	889	2,697	661
VTD: Ridgeland Tennis Center	5,659	1,347	4,377	931
VTD: SunnyBrook	757	75	540	54
VTD: Tougaloo	671	641	657	631
VTD: Trace Harbor (part)	12	2	12	2
VTD: Whispering Lake	2,394	269	1,716	177
VTD: Yandell Road	2,469	333	1,719	205
Madison MS County Subtotal	47,273	13,063	35,174	9,390
District 25 Subtotal	72,122	22,392	54,287	15,805
District 26				
Hinds MS County				
VTD: 38	1,476	1,238	1,013	808
VTD: 39	1,628	1,596	1,163	1,137
VTD: 41	2,537	2,503	1,872	1,842
VTD: 42	2,849	2,598	2,065	1,859
VTD: 43	3,838	3,465	2,551	2,252
VTD: 80 (part)	4,130	3,957	2,796	2,664
VTD: 81	1,902	1,817	1,584	1,505
VTD: 82	1,839	1,782	1,398	1,346
VTD: 83	3,738	3,697	2,650	2,616
VTD: 84	296	275	237	224
VTD: 85	3,222	3,175	2,390	2,354
VTD: Bolton	1,650	1,152	1,272	854
VTD: Brownsville	783	405	597	313
VTD: Clinton 1 (part)	2,520	721	1,957	500
VTD: Clinton 5	1,441	273	1,089	189
VTD: Clinton 6 (part)	189	47	143	33
VTD: Cynthia	1,104	752	817	560
VTD: Edwards	3,406	2,554	2,522	1,824
VTD: Pinehaven (part)	1,453	935	1,058	684
VTD: Pocahontas (part)	643	409	531	334
VTD: Raymond 1 (part)	3,277	1,544	2,423	1,046
VTD: Raymond 2 (part)	1,134	397	889	292
VTD: St. Thomas	461	435	347	326
VTD: Tinnin	1,221	264	897	189
Hinds MS County Subtotal	46,737	35,991	34,261	25,751
Madison MS County				
VTD: Lorman-Cavalier (part)	1,610	606	1,280	445
Madison MS County Subtotal	1,610	606	1,280	445

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District 26 Subtotal	48,347	36,597	35,541	26,196
District 27				
Hinds MS County				
VTD: 10	679	670	492	489
VTD: 11	659	644	508	498
VTD: 12	798	782	591	580
VTD: 13	1,044	1,017	807	790
VTD: 14	1,348	101	1,136	80
VTD: 15	442	26	387	26
VTD: 16	1,744	1,273	1,338	917
VTD: 17	843	65	662	43
VTD: 18	927	898	697	677
VTD: 21	811	777	587	557
VTD: 22	2,096	2,065	1,491	1,463
VTD: 23	2,125	2,098	1,417	1,399
VTD: 24	1,236	1,162	829	774
VTD: 27	1,713	1,686	1,368	1,349
VTD: 28	1,861	1,836	1,535	1,514
VTD: 29	976	948	764	741
VTD: 30	1,003	993	745	735
VTD: 31	1,474	1,440	1,140	1,112
VTD: 37	1,644	879	1,253	621
VTD: 4	861	856	643	639
VTD: 40	2,103	2,026	1,620	1,559
VTD: 54	1,280	1,212	969	905
VTD: 55	1,388	1,349	979	946
VTD: 56	589	559	444	422
VTD: 57	1,154	1,128	828	809
VTD: 6	1,916	1,106	1,594	844
VTD: 60	816	684	599	473
VTD: 61	1,634	1,573	1,137	1,096
VTD: 62	2,518	2,381	1,686	1,576
VTD: 86	2,343	2,247	1,607	1,540
VTD: Clinton 3	3,915	1,378	3,128	1,021
VTD: Clinton 4	2,090	793	1,514	519
VTD: Pinehaven (part)	2,038	465	1,515	306
Hinds MS County Subtotal	48,068	37,117	36,010	27,020
District 27 Subtotal	48,068	37,117	36,010	27,020
District 28				
Hinds MS County				
VTD: 19	1,023	1,004	730	714
VTD: 2	461	439	389	371
VTD: 20	1,047	1,027	798	784
VTD: 25	2,128	2,060	1,478	1,428
VTD: 26	1,077	983	774	690
VTD: 50	752	674	571	498
VTD: 51	614	601	465	452
VTD: 52	1,724	1,657	1,243	1,190
VTD: 53	309	305	235	231
VTD: 58	1,671	1,635	1,322	1,287
VTD: 59	2,300	2,252	1,531	1,486

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District 28 (continued)				
Hinds MS County (continued)				
VTD: 63	1,189	1,130	1,006	952
VTD: 64	802	782	626	610
VTD: 66	158	154	109	106
VTD: 67	1,585	1,481	1,014	928
VTD: 68	4,140	3,745	2,774	2,411
VTD: 69	2,007	1,821	1,276	1,116
VTD: 70	1,684	1,494	894	758
VTD: 71	2,144	1,808	1,360	1,068
VTD: 72	2,354	2,101	1,398	1,184
VTD: 73	2,166	1,868	1,385	1,143
VTD: 74	1,716	1,459	1,060	842
VTD: 75	1,389	1,187	882	717
VTD: 76	1,468	1,176	933	687
VTD: 77	2,897	2,182	1,891	1,307
VTD: 87	2,391	2,035	1,525	1,237
VTD: 88	2,501	2,213	1,835	1,580
VTD: 89	2,035	1,779	1,412	1,189
VTD: 90	3,254	2,766	2,025	1,620
VTD: 93 (part)	909	695	647	458
VTD: Jackson State	2,210	2,138	2,181	2,109
Hinds MS County Subtotal	52,105	46,651	35,769	31,153
District 28 Subtotal	52,105	46,651	35,769	31,153
District 29				
Hinds MS County				
VTD: 1	345	172	328	159
VTD: 47	1,781	1,441	1,401	1,106
VTD: 5	1,926	1,009	1,742	883
VTD: 8	1,303	139	1,181	128
VTD: 9	1,961	84	1,696	78
VTD: 91	2,927	2,686	2,086	1,879
VTD: 92	4,132	3,628	2,651	2,203
VTD: 93 (part)	1,891	1,658	1,228	1,038
VTD: 94	3,832	3,484	2,687	2,377
VTD: 95	877	556	646	364
VTD: 96	2,613	1,992	1,892	1,330
VTD: 97 (part)	1,210	870	825	532
VTD: Byram 1	8,418	5,211	5,886	3,433
VTD: Byram 2 (part)	3,123	1,063	2,359	712
VTD: Chapel Hill	1,384	620	1,068	452
VTD: Clinton 1 (part)	353	166	251	89
VTD: Clinton 2	6,645	1,770	4,888	1,172
VTD: Clinton 6 (part)	3,948	1,849	2,984	1,269
VTD: Dry Grove	1,271	407	1,011	318
VTD: Old Byram	3,959	1,500	2,936	989
VTD: Raymond 1 (part)	28	9	25	8
VTD: Raymond 2 (part)	0	0	0	0
VTD: Spring Ridge (part)	4,609	2,657	3,435	1,831
VTD: Terry	6,599	2,661	5,045	1,953
VTD: Utica 2 (part)	0	0	0	0

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	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 29 (continued)				
Hinds MS County Subtotal	65,135	35,632	48,251	24,303
District 29 Subtotal	65,135	35,632	48,251	24,303
District 30				
Hinds MS County				
VTD: 97 (<i>part</i>)	0	0	0	0
Hinds MS County Subtotal	0	0	0	0
Rankin MS County				
VTD: Antioch	436	12	319	4
VTD: Cato (<i>part</i>)	1,415	337	1,073	242
VTD: Crest Park	2,883	430	2,081	225
VTD: Crossroads	1,108	95	812	61
VTD: Cunningham Heights	1,883	339	1,388	240
VTD: Dry Creek (<i>part</i>)	4	0	4	0
VTD: East Brandon	3,163	333	2,310	222
VTD: East Crossgates (<i>part</i>)	796	196	597	135
VTD: Eldorado	2,637	721	2,031	503
VTD: Flowood (<i>part</i>)	134	60	106	41
VTD: Johns	911	199	693	146
VTD: Liberty (<i>part</i>)	2,301	318	1,917	251
VTD: Mayton	357	113	264	79
VTD: Mullins (<i>part</i>)	65	47	52	42
VTD: North Brandon (<i>part</i>)	5,882	554	4,195	403
VTD: North McLaurin (<i>part</i>)	1,775	196	1,347	130
VTD: North Pearson	540	44	409	35
VTD: North Richland	2,441	332	1,879	257
VTD: Northeast Brandon (<i>part</i>)	247	30	173	21
VTD: Park Place	4,317	1,051	3,319	847
VTD: Patton Place	1,661	198	1,250	128
VTD: Pearl	1,780	410	1,334	278
VTD: Puckett	954	164	702	107
VTD: Shiloh	454	114	339	97
VTD: South Brandon (<i>part</i>)	2,108	82	1,578	50
VTD: South Crossgates	1,418	68	1,190	49
VTD: South McLaurin	2,456	237	1,789	148
VTD: South Pearson	4,558	2,559	4,216	2,380
VTD: South Richland (<i>part</i>)	2,213	63	1,576	39
VTD: Springhill	3,728	1,635	2,773	1,150
VTD: West Brandon	7,002	2,368	4,780	1,528
VTD: West Crossgates	2,602	224	2,047	168
VTD: West Pearl	3,581	1,274	2,690	837
Rankin MS County Subtotal	67,810	14,803	51,233	10,843
District 30 Subtotal	67,810	14,803	51,233	10,843
District 31				
Lauderdale MS County				
VTD: 1 (<i>part</i>)	3,336	693	2,557	471
VTD: 13 (<i>part</i>)	98	48	86	41
VTD: Andrews Chapel	1,510	348	1,134	242
VTD: Bailey	2,052	498	1,602	385
VTD: Center Hill	2,114	183	1,559	115

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 31 (continued)				
Lauderdale MS County (continued)				
VTD: Collinsville <i>(part)</i>	2,460	318	1,801	233
VTD: Daleville <i>(part)</i>	43	31	35	24
VTD: Marion	1,199	624	848	423
VTD: Martin	1,396	23	1,007	17
VTD: New Lauderdale	3,530	567	2,724	438
VTD: Obadiah	267	7	194	6
VTD: Prospect	1,028	170	871	112
VTD: Suqualena <i>(part)</i>	30	0	21	0
VTD: West Lauderdale	371	38	263	22
Lauderdale MS County Subtotal	19,434	3,548	14,702	2,529
Newton MS County	21,720	6,567	16,067	4,663
Scott MS County				
VTD: East-West Morton <i>(part)</i>	0	0	0	0
VTD: Harpersville	1,813	1,007	1,325	723
VTD: High Hill	521	241	386	174
VTD: Hillsboro	1,447	850	1,050	621
VTD: Homewood <i>(part)</i>	5	0	4	0
VTD: House	649	102	472	71
VTD: Lake	622	308	446	224
VTD: Langs Mill	1,730	470	1,240	330
VTD: North Forest	2,092	1,388	1,421	899
VTD: Northeast Forest	932	149	737	102
VTD: Northwest Forest <i>(part)</i>	12	0	6	0
VTD: Salem	1,095	556	765	362
VTD: Sebastapol	855	89	631	57
VTD: South Forest <i>(part)</i>	3,667	1,491	2,650	1,007
VTD: Steele	1,374	770	964	527
Scott MS County Subtotal	16,814	7,421	12,097	5,097
District 31 Subtotal	57,968	17,536	42,866	12,289
District 32				
Kemper MS County	10,456	6,288	8,015	4,604
Lauderdale MS County				
VTD: 10	984	798	654	505
VTD: 11	1,292	1,090	1,000	827
VTD: 12	2,329	2,124	1,671	1,503
VTD: 14	1,717	1,402	1,332	1,034
VTD: 15	405	342	263	209
VTD: 16 <i>(part)</i>	47	5	41	5
VTD: 17 <i>(part)</i>	67	17	56	12
VTD: 18 <i>(part)</i>	347	151	277	100
VTD: 20	986	856	771	650
VTD: 4	1,512	1,245	1,084	881
VTD: 6	4,618	4,041	3,171	2,726
VTD: 9	3,462	2,906	2,209	1,752
VTD: Center Ridge	433	332	308	227
VTD: Daleville <i>(part)</i>	485	322	365	252
VTD: East Bonita <i>(part)</i>	1	0	1	0

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 32 (continued)				
Lauderdale MS County (continued)				
VTD: East Lauderdale <i>(part)</i>	1,933	559	1,479	382
VTD: East Marion	512	148	391	100
VTD: Kewanee <i>(part)</i>	17	17	15	15
VTD: West Dalewood	292	39	235	26
Lauderdale MS County Subtotal	21,439	16,394	15,323	11,206
Noxubee MS County				
VTD: Brooksville <i>(part)</i>	4	0	4	0
VTD: Central District 3 <i>(part)</i>	2,478	1,977	1,774	1,375
VTD: Earl Nash Gym	1,981	1,497	1,446	1,050
VTD: Mashulaville	626	369	469	268
VTD: Noxubee Cnty Vo-Tech Cen. <i>(part)</i>	402	286	288	207
VTD: Savannah <i>(part)</i>	99	48	73	36
VTD: Shuqualak	1,204	919	895	664
VTD: Somerville	263	49	215	45
Noxubee MS County Subtotal	7,057	5,145	5,164	3,645
Winston MS County				
VTD: American Legion	1,589	1,369	1,133	957
VTD: County Agent <i>(part)</i>	1,833	1,527	1,220	982
VTD: East Winston <i>(part)</i>	727	152	574	114
VTD: Fairground <i>(part)</i>	2,834	1,225	2,181	851
VTD: Lovorn Tractor <i>(part)</i>	266	67	210	43
VTD: Mill Creek <i>(part)</i>	1,814	684	1,408	495
VTD: Nanih Waiya <i>(part)</i>	640	142	465	105
VTD: New National Guard Armory <i>(part)</i>	0	0	0	0
VTD: Shiloh <i>(part)</i>	314	11	251	7
VTD: Zion Ridge	931	810	688	592
Winston MS County Subtotal	10,948	5,987	8,130	4,146
District 32 Subtotal	49,900	33,814	36,632	23,601
District 33				
Clarke MS County	16,732	5,759	12,604	4,006
Lauderdale MS County				
VTD: 1 <i>(part)</i>	211	34	169	20
VTD: 13 <i>(part)</i>	3,497	1,343	2,677	840
VTD: 16 <i>(part)</i>	485	111	387	79
VTD: 17 <i>(part)</i>	44	6	36	3
VTD: 18 <i>(part)</i>	2	0	2	0
VTD: 2	551	149	437	102
VTD: 3	4,412	3,049	3,168	1,997
VTD: 5	4,341	1,946	3,149	1,256
VTD: 7	1,482	1,015	1,114	701
VTD: 8	2,206	1,400	1,738	1,020
VTD: Alamucha	422	145	311	108
VTD: Causeyville	903	45	715	33
VTD: Clarkdale	1,241	68	937	55
VTD: Collinsville <i>(part)</i>	55	0	44	0
VTD: Culpepper	829	23	607	18
VTD: East Bonita <i>(part)</i>	956	295	782	230

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District 33 (continued)				
Lauderdale MS County (continued)				
VTD: East Lauderdale <i>(part)</i>	50	42	40	33
VTD: Kewanee <i>(part)</i>	516	247	381	177
VTD: Meehan	2,305	1,030	2,059	984
VTD: Mt. Gilead	1,087	272	811	192
VTD: Odom	941	377	707	273
VTD: Pickard	862	178	660	113
VTD: Russell	1,419	559	1,068	386
VTD: Sageville	248	108	202	92
VTD: South Nellieburg	1,077	150	901	132
VTD: South Russell	302	62	224	45
VTD: Suqualena <i>(part)</i>	2,517	375	1,956	279
VTD: Toomsuba	950	427	732	322
VTD: Valley	408	52	313	33
VTD: Vimville	2,291	544	1,729	374
VTD: Whynot	934	183	709	120
VTD: Zero	1,844	153	1,391	108
Lauderdale MS County Subtotal	39,388	14,388	30,156	10,125
District 33 Subtotal	56,120	20,147	42,760	14,131
District 34				
Jasper MS County	17,062	8,970	12,939	6,439
Jones MS County				
VTD: Antioch <i>(part)</i>	11	0	10	0
VTD: Cooks Ave. Comm. Ctr.	1,048	1,005	737	704
VTD: Currie <i>(part)</i>	0	0	0	0
VTD: Erata <i>(part)</i>	689	320	524	247
VTD: Glade School <i>(part)</i>	112	90	73	56
VTD: Laurel Courthouse <i>(part)</i>	45	27	27	16
VTD: Myrick <i>(part)</i>	6	0	3	0
VTD: National Guard Armory <i>(part)</i>	2,190	1,714	1,571	1,145
VTD: Nora Davis School <i>(part)</i>	1,635	1,526	1,224	1,124
VTD: Oak Park School	1,604	1,584	1,003	990
VTD: Old Health Dept. <i>(part)</i>	0	0	0	0
VTD: Pendorf <i>(part)</i>	0	0	0	0
VTD: Powers Comm. Ctr. <i>(part)</i>	1,651	359	1,237	258
VTD: Rustin <i>(part)</i>	13	0	12	0
VTD: Sandersville Civic Center <i>(part)</i>	1,494	149	1,117	110
VTD: Stainton <i>(part)</i>	0	0	0	0
Jones MS County Subtotal	10,498	6,774	7,538	4,650
Scott MS County				
VTD: Clifton	171	17	127	13
VTD: Contrell	676	474	466	313
VTD: Cooperville	726	31	556	20
VTD: East-West Morton <i>(part)</i>	3,370	864	2,535	634
VTD: Forkville	421	15	335	12
VTD: Homewood <i>(part)</i>	554	159	408	104
VTD: Liberty	989	215	731	136
VTD: Ludlow	869	233	672	158
VTD: North Morton	2,318	1,023	1,679	709

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District 34 (continued)				
Scott MS County (continued)				
VTD: Northwest Forest <i>(part)</i>	10	0	4	0
VTD: Pulaski	705	97	528	66
VTD: South Forest <i>(part)</i>	25	21	19	15
VTD: Springfield	616	15	473	12
Scott MS County Subtotal	11,450	3,164	8,533	2,192
Smith MS County	16,491	3,776	12,230	2,582
District 34 Subtotal	55,501	22,684	41,240	15,863
District 35				
Copiah MS County				
VTD: Crystal Springs East <i>(part)</i>	3,975	1,453	3,063	1,005
VTD: Crystal Springs North <i>(part)</i>	133	117	98	83
VTD: Crystal Springs South <i>(part)</i>	83	15	60	7
Copiah MS County Subtotal	4,191	1,585	3,221	1,095
Covington MS County				
VTD: Collins <i>(part)</i>	2,288	1,358	1,629	909
VTD: Dry Creek	762	558	566	399
VTD: Gilmer	701	596	479	396
VTD: Lone Star/Black Jack <i>(part)</i>	185	115	148	89
VTD: Mitchell <i>(part)</i>	0	0	0	0
VTD: Mt. Olive	2,307	1,174	1,704	801
VTD: Okahay	1,386	1,173	956	792
VTD: Rock Hill	227	24	179	19
VTD: Station Creek	636	457	481	335
VTD: West Collins <i>(part)</i>	2	0	2	0
VTD: Williamsburg <i>(part)</i>	7	2	6	2
VTD: Yawn	563	137	441	107
Covington MS County Subtotal	9,064	5,594	6,591	3,849
Rankin MS County				
VTD: Cato <i>(part)</i>	361	48	269	35
VTD: Clear Branch	1,466	214	1,084	160
VTD: Cleary	2,577	103	1,944	76
VTD: Dry Creek <i>(part)</i>	1,684	666	1,173	402
VTD: East Steens Creek	4,327	764	3,136	530
VTD: Monterey	3,304	921	2,423	689
VTD: Mountain Creek	785	102	590	82
VTD: South Brandon <i>(part)</i>	6	0	4	0
VTD: South Richland <i>(part)</i>	3,368	778	2,337	451
VTD: Star	1,546	328	1,171	237
VTD: West Steens Creek	3,649	447	2,705	353
Rankin MS County Subtotal	23,073	4,371	16,836	3,015
Simpson MS County				
VTD: Bowie <i>(part)</i>	38	38	25	25
VTD: Braxton	1,422	60	1,086	44
VTD: DLo	665	126	511	90
VTD: Dry Creek (28127304)	1,538	158	1,154	116
VTD: Fork Church	834	575	611	405
VTD: Harrisville	1,604	214	1,176	129

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District 35 (continued)				
Simpson MS County (continued)				
VTD: Jupiter	998	697	726	495
VTD: Jupiter A	259	176	182	118
VTD: Magee 1 (part)	1,416	1,160	948	732
VTD: Magee 2 (part)	49	2	43	2
VTD: Magee 2 A (part)	900	160	707	128
VTD: Magee 4-N (part)	58	56	46	44
VTD: Magee 4N A	227	27	171	17
VTD: Magee 4-S (part)	16	2	16	2
VTD: Mendenhall 1	782	509	581	379
VTD: Mendenhall 3	2,183	370	1,603	226
VTD: Merit	1,172	89	898	67
VTD: New Hope (part)	605	300	452	214
VTD: Pearl	923	133	708	99
VTD: Saratoga	548	259	436	194
VTD: Sumrall	875	192	648	130
VTD: Weathersby (part)	1,788	1,372	1,315	967
Simpson MS County Subtotal	18,900	6,675	14,043	4,623
District 35 Subtotal	55,228	18,225	40,691	12,582
District 36				
Claiborne MS County				
	9,604	8,104	7,335	6,042
Copiah MS County				
VTD: Beauregard	1,627	312	1,171	218
VTD: Carpenter	545	422	433	328
VTD: Centerpoint	1,657	593	1,278	457
VTD: Crystal Springs East (part)	3	1	3	1
VTD: Crystal Springs North (part)	812	549	615	388
VTD: Crystal Springs South (part)	3,281	2,338	2,450	1,685
VTD: Crystal Springs West	1,674	746	1,287	539
VTD: Dentville	309	72	252	49
VTD: Gallman	3,256	1,611	2,431	1,104
VTD: Georgetown North	469	283	358	205
VTD: Georgetown South	801	289	614	202
VTD: Hazlehurst East	2,337	2,050	1,628	1,416
VTD: Hazlehurst North	673	442	480	277
VTD: Hazlehurst South	754	468	571	341
VTD: Hazlehurst West	2,955	2,212	2,191	1,560
VTD: Martinsville	816	495	576	335
VTD: Shady Grove	798	139	584	95
VTD: Strong Hope-Union	766	44	590	27
VTD: Wesson	1,725	332	1,332	278
Copiah MS County Subtotal	25,258	13,398	18,844	9,505
Hinds MS County				
VTD: Byram 2 (part)	0	0	0	0
VTD: Cayuga	494	312	375	232
VTD: Learned	999	425	750	304
VTD: Raymond 2 (part)	4,283	2,258	3,730	2,040
VTD: Spring Ridge (part)	7	7	7	7
VTD: Utica 1	1,294	613	1,003	446

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District 36 (continued)				
Hinds MS County (continued)				
VTD: Utica 2 (<i>part</i>)	1,309	1,035	970	748
Hinds MS County Subtotal	8,386	4,650	6,835	3,777
Jefferson MS County	7,726	6,620	5,901	4,940
District 36 Subtotal	50,974	32,772	38,915	24,264
District 37				
Adams MS County				
VTD: Airport	1,252	868	977	666
VTD: Beau Pre	1,557	645	1,149	459
VTD: Bellemont	3,229	982	2,670	753
VTD: By-Pass Firestation (<i>part</i>)	1,830	1,318	1,314	898
VTD: Carpenter	1,040	682	830	524
VTD: Concord	1,261	1,171	916	850
VTD: Convention Center	897	518	660	362
VTD: Courthouse	1,120	173	989	151
VTD: Duncan Park	2,007	830	1,555	555
VTD: Kingston (<i>part</i>)	1,213	167	983	118
VTD: Liberty Park	1,537	277	1,172	177
VTD: Maryland	1,623	1,461	1,062	939
VTD: Morgantown	969	678	714	456
VTD: Oakland	2,282	1,108	1,707	708
VTD: Palestine	1,979	953	1,486	725
VTD: Pine Ridge (<i>part</i>)	1,120	892	834	654
VTD: Thompson (<i>part</i>)	0	0	0	0
VTD: Washington	3,084	481	2,851	391
Adams MS County Subtotal	28,000	13,204	21,869	9,386
Amite MS County				
VTD: Amite River (<i>part</i>)	22	13	19	10
VTD: Berwick (<i>part</i>)	64	30	48	24
VTD: Crosby (<i>part</i>)	334	198	251	140
VTD: East Fork	882	332	704	261
VTD: East Gloster (<i>part</i>)	624	201	489	132
VTD: East Liberty	396	141	332	116
VTD: Homochitto (<i>part</i>)	146	27	121	24
VTD: Liberty	826	260	650	184
VTD: New Zion	636	114	487	88
VTD: Oneil (<i>part</i>)	314	7	264	6
VTD: Smithdale	801	243	621	173
VTD: South Liberty (<i>part</i>)	770	189	590	142
VTD: Tangipahoa	614	120	482	88
VTD: Tickfaw (<i>part</i>)	91	46	72	33
VTD: Zion Hill	517	39	418	32
Amite MS County Subtotal	7,037	1,960	5,548	1,453
Franklin MS County	8,118	2,791	6,075	1,948
Pike MS County				
VTD: 15	1,239	245	867	148
VTD: 17	947	472	749	340
VTD: 19	1,332	702	1,049	544

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District 37 (continued)				
Pike MS County (continued)				
VTD: 20	1,709	550	1,344	445
VTD: 21	1,675	151	1,182	106
VTD: 22	848	160	699	118
VTD: 23	1,039	226	795	164
VTD: 25	1,024	248	890	186
VTD: 26	814	223	620	145
VTD: 27	513	184	394	130
VTD: 28	1,427	663	1,074	460
Pike MS County Subtotal	12,567	3,824	9,663	2,786
Wilkinson MS County				
VTD: Cold Springs Precinct (<i>part</i>)	0	0	0	0
Wilkinson MS County Subtotal	0	0	0	0
District 37 Subtotal	55,722	21,779	43,155	15,573
District 38				
Adams MS County				
VTD: By-Pass Firestation (<i>part</i>)	59	53	45	41
VTD: Foster Mound	1,626	1,522	1,231	1,142
VTD: Kingston (<i>part</i>)	0	0	0	0
VTD: Northside School	1,411	1,391	1,058	1,041
VTD: Pine Ridge (<i>part</i>)	55	55	39	39
VTD: Thompson (<i>part</i>)	1,146	1,062	860	797
Adams MS County Subtotal	4,297	4,083	3,233	3,060
Amite MS County				
VTD: Amite River (<i>part</i>)	604	473	476	371
VTD: Ariel	404	265	297	199
VTD: Berwick (<i>part</i>)	461	368	332	269
VTD: Crosby (<i>part</i>)	0	0	0	0
VTD: East Centreville	724	296	533	210
VTD: East Gloster (<i>part</i>)	9	0	4	0
VTD: Gloster	1,323	1,011	1,005	751
VTD: Homochitto (<i>part</i>)	28	2	24	2
VTD: Oneil (<i>part</i>)	0	0	0	0
VTD: Riceville	765	388	542	277
VTD: South Liberty (<i>part</i>)	197	104	149	73
VTD: Street	539	116	413	87
VTD: Tickfaw (<i>part</i>)	140	80	118	65
VTD: Walls	900	364	735	289
Amite MS County Subtotal	6,094	3,467	4,628	2,593
Pike MS County				
VTD: 1	1,732	947	1,235	646
VTD: 10	2,029	1,405	1,490	977
VTD: 11	1,147	555	882	398
VTD: 12	591	487	419	334
VTD: 13	1,343	675	994	495
VTD: 14	1,483	307	1,066	216
VTD: 16	1,734	1,651	1,185	1,135
VTD: 18	613	435	437	293

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District 38 (continued)				
Pike MS County (continued)				
VTD: 2	1,656	1,141	1,217	801
VTD: 24	1,745	1,729	1,024	1,013
VTD: 29	1,197	374	931	279
VTD: 3	2,261	902	1,517	585
VTD: 30	970	400	724	273
VTD: 31	854	303	657	207
VTD: 32	1,048	426	816	325
VTD: 4	1,054	300	745	211
VTD: 5	1,359	1,091	963	718
VTD: 6	1,298	976	838	586
VTD: 7	907	854	585	550
VTD: 8	1,483	1,143	1,029	774
VTD: 9	1,333	888	1,016	649
Pike MS County Subtotal	27,837	16,989	19,770	11,465
Walthall MS County				
VTD: Dexter (<i>part</i>)	270	235	193	167
VTD: Dinan	1,763	1,401	1,230	939
VTD: Lexie (<i>part</i>)	313	97	234	62
VTD: Midway	476	95	360	66
VTD: North Kirklin (<i>part</i>)	964	560	706	391
VTD: Saint Paul	389	273	281	191
VTD: South Kirklin	426	151	289	90
VTD: West Tylertown (<i>part</i>)	9	5	7	3
Walthall MS County Subtotal	4,610	2,817	3,300	1,909
Wilkinson MS County				
VTD: Centreville First District Precinct	1,437	1,230	920	765
VTD: Centreville Third District Precinct	1,746	1,065	1,337	761
VTD: Cold Springs Precinct (<i>part</i>)	389	204	301	149
VTD: Fort Adams Precinct	762	578	588	430
VTD: Longmire Precinct	844	372	652	259
VTD: Woodville Fifth District Precinct	1,697	1,132	1,528	1,040
VTD: Woodville First District Precinct	894	584	686	434
VTD: Woodville Fourth District Precinct	1,008	863	790	665
VTD: Woodville Second District Precinct	1,101	964	805	697
Wilkinson MS County Subtotal	9,878	6,992	7,607	5,200
District 38 Subtotal	52,716	34,348	38,538	24,227
District 39				
Lawrence MS County				
	12,929	3,974	9,663	2,777
Lincoln MS County				
	34,869	10,443	25,766	7,398
Simpson MS County				
VTD: Bowie (<i>part</i>)	524	175	387	122
VTD: Bridgeport	588	365	438	262
VTD: Magee 1 (<i>part</i>)	28	24	19	15
VTD: Magee 2 (<i>part</i>)	1,815	495	1,300	320
VTD: Magee 2 A (<i>part</i>)	0	0	0	0
VTD: Magee 4-N (<i>part</i>)	1,041	269	687	151
VTD: Magee 4-S (<i>part</i>)	2,030	537	1,480	332

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 39 (continued)				
Simpson MS County (continued)				
VTD: New Hope <i>(part)</i>	77	62	49	40
VTD: Oak Grove	427	128	319	96
VTD: Oak Grove A	339	296	236	201
VTD: Oak Grove B	188	59	140	37
VTD: Pinola	683	176	524	135
VTD: Shivers	250	20	186	13
VTD: Shivers A	606	385	440	277
VTD: Weathersby <i>(part)</i>	7	0	4	0
Simpson MS County Subtotal	8,603	2,991	6,209	2,001
District 39 Subtotal	56,401	17,408	41,638	12,176
District 40				
Marion MS County				
VTD: 5 South Columbia	742	506	675	450
VTD: Balls Mill	1,166	218	881	172
VTD: Carley <i>(part)</i>	71	0	58	0
VTD: Cedar Grove <i>(part)</i>	83	29	60	15
VTD: City Hall	719	327	524	217
VTD: Courthouse	1,483	374	1,079	252
VTD: Darbun (2809113)	441	63	335	50
VTD: East Columbia <i>(part)</i>	2,189	1,641	1,544	1,117
VTD: Foxworth	2,243	686	1,587	468
VTD: Goss	806	147	613	109
VTD: Hub	909	517	672	358
VTD: Jefferson Middle School	597	539	383	349
VTD: kokomo	1,127	249	824	198
VTD: Morgantown	860	1	630	1
VTD: Morris <i>(part)</i>	23	4	22	4
VTD: National Guard <i>(part)</i>	2,514	214	2,033	161
VTD: Pine Burr	1,022	232	780	173
VTD: Pittman	936	19	670	13
VTD: Popetown <i>(part)</i>	1,976	924	1,429	607
VTD: Sandy Hook	765	301	550	198
VTD: Stoval	956	419	683	292
VTD: Union <i>(part)</i>	497	16	386	14
VTD: White Bluff	144	0	102	0
Marion MS County Subtotal	22,269	7,426	16,520	5,218
Pearl River MS County				
VTD: Anchor Lake/West Union <i>(part)</i>	1,343	23	1,025	16
VTD: Buck Branch <i>(part)</i>	1,318	13	1,007	8
VTD: Caesar <i>(part)</i>	0	0	0	0
VTD: Carriere	2,299	175	1,645	120
VTD: Derby <i>(part)</i>	172	0	124	0
VTD: Ford's Creek <i>(part)</i>	308	16	252	14
VTD: Henleyfield	1,599	37	1,257	27
VTD: Hide-A-Way North Hills <i>(part)</i>	2,722	113	2,162	92
VTD: McNeill 5 <i>(part)</i>	0	0	0	0
VTD: Mill Creek	1,620	35	1,171	25
VTD: Nicholson <i>(part)</i>	2,741	273	2,034	164

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 40 (continued)				
Pearl River MS County (continued)				
VTD: Ozona	1,880	60	1,375	44
VTD: Picayune 1 East <i>(part)</i>	883	86	674	59
VTD: Picayune 1 South <i>(part)</i>	804	386	604	261
VTD: Picayune 2 <i>(part)</i>	2,429	163	1,881	113
VTD: Picayune 4 East <i>(part)</i>	1,622	324	1,115	180
VTD: Picayune 4 West	1,183	57	919	36
VTD: Picayune 5 <i>(part)</i>	2,195	180	1,723	136
VTD: Pine Grove	2,784	104	2,125	76
VTD: Salem <i>(part)</i>	417	8	306	5
VTD: Sycamore <i>(part)</i>	1,281	29	970	20
Pearl River MS County Subtotal	29,600	2,082	22,369	1,396
Walthall MS County				
VTD: Darbun	261	82	194	51
VTD: Dexter <i>(part)</i>	1,084	191	820	133
VTD: Dist.3 Tylertown	573	109	476	80
VTD: Dist.4 Tylertown	907	140	709	99
VTD: Dist.4 West	701	121	539	92
VTD: East Tylertown	131	3	107	3
VTD: Enon	590	105	415	67
VTD: Hope	528	459	375	323
VTD: Improve	820	215	638	160
VTD: Lexie <i>(part)</i>	955	142	750	92
VTD: Mesa	106	7	85	5
VTD: North Kirklin <i>(part)</i>	33	7	25	5
VTD: North Knoxo	1,677	1,457	1,163	992
VTD: Sartintville	435	189	315	122
VTD: South Knoxo	199	73	154	58
VTD: Varnell	982	247	693	175
VTD: West Tylertown <i>(part)</i>	851	509	610	335
Walthall MS County Subtotal	10,833	4,056	8,068	2,792
District 40 Subtotal	62,702	13,564	46,957	9,406
District 41				
Covington MS County				
VTD: Collins <i>(part)</i>	956	331	693	192
VTD: Lone Star/Black Jack <i>(part)</i>	286	49	224	33
VTD: Mitchell <i>(part)</i>	300	15	235	12
VTD: Richmond	1,390	40	998	28
VTD: Sanford	1,828	68	1,386	43
VTD: Seminary	3,242	331	2,367	221
VTD: South Collins	884	127	694	85
VTD: Strahan	291	90	216	59
VTD: West Collins <i>(part)</i>	806	38	676	34
VTD: Williamsburg <i>(part)</i>	521	142	401	90
Covington MS County Subtotal	10,504	1,231	7,890	797
Forrest MS County				
VTD: Blair High School <i>(part)</i>	135	109	83	61
VTD: Davis School <i>(part)</i>	2,409	1,808	1,760	1,288
VTD: Dixie Pine-Central <i>(part)</i>	1,287	1,121	947	809

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 41 (continued)				
Forrest MS County (continued)				
VTD: East Petal (part)	0	0	0	0
VTD: Eaton School (part)	877	692	628	486
VTD: Jones School (part)	1,037	972	802	755
VTD: North Heights (part)	1,282	956	1,004	722
VTD: Rawls Springs (part)	2,000	816	1,484	542
VTD: Rowan School (part)	1,066	1,010	729	684
VTD: Salvation Army (part)	1,980	1,453	1,516	1,030
VTD: Sunrise (part)	0	0	0	0
VTD: USM Golf Course (part)	569	105	478	87
VTD: Walthall School (part)	631	476	447	351
Forrest MS County Subtotal	13,273	9,518	9,878	6,815
Jefferson Davis MS County	12,487	7,477	9,539	5,367
Lamar MS County				
VTD: Baxterville (part)	838	5	604	2
VTD: Breland (part)	2	0	2	0
VTD: Greenville (part)	1,152	4	849	3
VTD: Lumberton (part)	3,005	1,312	2,171	881
VTD: Midway	2,681	208	1,895	117
VTD: Oloh	1,221	43	901	28
VTD: Pine Grove (part)	880	17	629	7
VTD: Rocky Branch	1,038	204	764	152
VTD: South Purvis (part)	31	0	22	0
VTD: Sumrall	4,129	331	3,000	231
VTD: Yawn	578	15	442	10
Lamar MS County Subtotal	15,555	2,139	11,279	1,431
Marion MS County				
VTD: Carley (part)	1,375	87	1,042	58
VTD: Cedar Grove (part)	744	238	557	177
VTD: East Columbia (part)	0	0	0	0
VTD: Morris (part)	2,509	859	1,912	620
VTD: National Guard (part)	0	0	0	0
VTD: Popetown (part)	191	142	125	95
VTD: Union (part)	0	0	0	0
Marion MS County Subtotal	4,819	1,326	3,636	950
District 41 Subtotal	56,638	21,691	42,222	15,360
District 42				
Jones MS County				
VTD: Antioch (part)	764	1	572	1
VTD: Blackwell	131	9	99	7
VTD: Bruce	755	24	579	19
VTD: Calhoun	2,912	26	2,251	24
VTD: Cameron Center	1,258	460	912	289
VTD: Centerville	390	7	293	4
VTD: County Barn	1,711	385	1,400	320
VTD: Currie (part)	283	269	219	208
VTD: Ellisville Court House	1,508	428	1,252	359
VTD: Erata (part)	0	0	0	0

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 42 (continued)				
Jones MS County (continued)				
VTD: Gitano	423	136	330	101
VTD: Glade School <i>(part)</i>	1,740	55	1,367	40
VTD: Hebron	1,069	674	775	474
VTD: Johnson	1,093	13	811	5
VTD: Kingston Church	842	739	524	440
VTD: Lamar School	1,873	810	1,359	519
VTD: Landrum Comm. Ctr.	702	3	537	3
VTD: Laurel Courthouse <i>(part)</i>	1,746	809	1,274	528
VTD: Matthews	943	109	710	73
VTD: Mauldin Comm. Center	1,966	338	1,481	256
VTD: Moselle	2,018	266	1,481	200
VTD: Myrick <i>(part)</i>	1,971	24	1,474	14
VTD: National Guard Armory <i>(part)</i>	22	22	17	17
VTD: Nora Davis School <i>(part)</i>	4	0	3	0
VTD: North Laurel	3,429	1,187	2,566	716
VTD: Old Health Dept. <i>(part)</i>	629	559	411	373
VTD: Overt	1,522	32	1,135	22
VTD: Pendorf <i>(part)</i>	1,113	108	762	62
VTD: Pinegrove	1,426	114	1,132	104
VTD: Pleasant Ridge	1,170	18	890	12
VTD: Powers Comm. Ctr. <i>(part)</i>	64	9	51	5
VTD: Rainey	1,855	16	1,380	14
VTD: Roosevelt	860	593	618	401
VTD: Rustin <i>(part)</i>	1,013	4	757	4
VTD: Sandersville Civic Center <i>(part)</i>	63	0	49	0
VTD: Sandhill	1,357	14	1,048	7
VTD: Shady Grove	5,588	1,658	4,037	1,012
VTD: Sharon	2,133	248	1,661	185
VTD: Shelton	1,215	227	937	170
VTD: Soso	1,738	790	1,282	554
VTD: South Jones	1,226	316	956	215
VTD: Stainton <i>(part)</i>	1,697	844	1,248	560
VTD: Tuckers	1,575	13	1,162	8
VTD: Union	1,466	22	1,073	17
Jones MS County Subtotal	57,263	12,379	42,875	8,342
District 42 Subtotal	57,263	12,379	42,875	8,342
District 43				
George MS County	22,578	1,829	16,518	1,320
Greene MS County	14,400	3,749	11,244	3,191
Stone MS County				
VTD: Big Level	1,277	66	978	44
VTD: McHenry Fire Station <i>(part)</i>	774	57	538	33
VTD: Pleasant Hill	434	39	334	23
VTD: Tuxachanie	1,985	32	1,489	24
Stone MS County Subtotal	4,470	194	3,339	124
Wayne MS County	20,747	8,071	15,313	5,487
District 43 Subtotal	62,195	13,843	46,414	10,122

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	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 44				
Forrest MS County				
VTD: Barrontown-Macedonia	4,427	337	3,239	242
VTD: Blair High School <i>(part)</i>	890	572	720	440
VTD: Camp School <i>(part)</i>	187	148	147	114
VTD: Davis School <i>(part)</i>	45	33	32	22
VTD: Dixie Pine-Central <i>(part)</i>	820	565	599	408
VTD: East Petal <i>(part)</i>	3,415	297	2,482	177
VTD: Eaton School <i>(part)</i>	249	133	195	108
VTD: Eatonville	1,349	239	1,095	177
VTD: Glendale	2,215	1,233	1,662	880
VTD: Highland Park <i>(part)</i>	444	256	357	190
VTD: Jones School <i>(part)</i>	0	0	0	0
VTD: Leeville	2,050	132	1,470	91
VTD: North Heights <i>(part)</i>	1,098	686	869	500
VTD: Petal Masonic Lodge	2,536	159	1,889	94
VTD: Rawls Springs <i>(part)</i>	80	37	58	21
VTD: Rowan School <i>(part)</i>	627	605	414	400
VTD: Salvation Army <i>(part)</i>	1,387	1,320	774	732
VTD: Sunrise <i>(part)</i>	4,181	481	3,049	353
VTD: USM Golf Course <i>(part)</i>	2	0	2	0
VTD: Walthall School <i>(part)</i>	442	240	328	186
VTD: West Petal	1,692	350	1,251	227
Forrest MS County Subtotal	28,136	7,823	20,632	5,362
Lamar MS County				
VTD: Arnold Line	3,022	1,009	2,064	563
VTD: Baxterville <i>(part)</i>	0	0	0	0
VTD: Bellevue	1,866	27	1,429	19
VTD: Breland <i>(part)</i>	5,932	1,669	4,273	1,119
VTD: Greenville <i>(part)</i>	365	0	269	0
VTD: Lake Serene	3,966	264	2,803	165
VTD: Lamar Park	3,306	1,137	2,613	818
VTD: Lumberton <i>(part)</i>	0	0	0	0
VTD: N E Lamar	3,584	1,296	2,862	880
VTD: Oak Grove	3,368	328	2,394	203
VTD: Okahola <i>(part)</i>	1,146	283	791	170
VTD: Pine Grove <i>(part)</i>	175	0	127	0
VTD: Purvis	3,881	615	2,934	438
VTD: Richburg <i>(part)</i>	3,342	484	2,403	327
VTD: South Purvis <i>(part)</i>	2,982	72	2,245	43
VTD: Wesley Manor <i>(part)</i>	770	738	523	496
Lamar MS County Subtotal	37,705	7,922	27,730	5,241
Perry MS County				
VTD: Holly Street	798	130	593	85
VTD: Indian Springs <i>(part)</i>	28	24	22	19
VTD: Richton City Hall <i>(part)</i>	1,567	78	1,152	44
VTD: Richton Multi-Purpose	969	385	732	275
VTD: Runnelstown <i>(part)</i>	2,061	24	1,532	19
Perry MS County Subtotal	5,423	641	4,031	442
District 44 Subtotal	71,264	16,386	52,393	11,045

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District 45				
Forrest MS County				
VTD: Blair High School <i>(part)</i>	2,699	1,248	2,301	959
VTD: Brooklyn	1,140	30	845	25
VTD: Camp School <i>(part)</i>	761	214	649	163
VTD: Carnes	1,535	16	1,122	13
VTD: Dantzler	993	13	737	10
VTD: Dixie	3,803	324	2,851	213
VTD: Dixie Pine-Central <i>(part)</i>	531	95	386	72
VTD: Eaton School <i>(part)</i>	10	10	6	6
VTD: Highland Park <i>(part)</i>	2,931	1,321	2,495	995
VTD: Lillie Burney School	1,219	1,167	731	697
VTD: Maxie	369	67	295	58
VTD: McLaurin	804	64	623	53
VTD: Pinecrest	4,462	1,509	4,015	1,287
VTD: Sunrise <i>(part)</i>	1,182	165	837	102
VTD: Thames School	3,214	404	2,599	268
VTD: Timberton	607	78	461	59
VTD: USM Golf Course <i>(part)</i>	504	232	481	218
VTD: Walthall School <i>(part)</i>	676	277	556	216
VTD: Westside	3,266	1,864	2,384	1,117
VTD: Woodley School	2,819	643	2,347	444
Forrest MS County Subtotal	33,525	9,741	26,721	6,975
Lamar MS County				
VTD: Okahola <i>(part)</i>	32	0	25	0
VTD: Richburg <i>(part)</i>	42	4	28	1
VTD: Wesley Manor <i>(part)</i>	2,324	818	1,988	639
Lamar MS County Subtotal	2,398	822	2,041	640
Pearl River MS County				
VTD: Buck Branch <i>(part)</i>	0	0	0	0
VTD: Byrd Line	382	5	311	2
VTD: Derby <i>(part)</i>	1,249	173	1,024	145
VTD: Ford's Creek <i>(part)</i>	0	0	0	0
VTD: Gum Pond	1,689	22	1,282	15
VTD: Hickory Grove	336	19	270	15
VTD: McNeill 3 <i>(part)</i>	1,568	58	1,122	37
VTD: McNeill 5 <i>(part)</i>	937	25	679	19
VTD: Oak Hill	1,230	21	933	19
VTD: Poplarville 1 <i>(part)</i>	0	0	0	0
VTD: Poplarville 2 <i>(part)</i>	1,809	302	1,518	283
VTD: Poplarville 3 <i>(part)</i>	1,012	31	765	24
VTD: Progress	609	1	484	1
VTD: Savannah <i>(part)</i>	368	4	272	4
VTD: Steep Hollow <i>(part)</i>	464	13	341	8
VTD: Whitesand 1 <i>(part)</i>	158	4	133	4
VTD: Whitesand 2	359	2	287	2
Pearl River MS County Subtotal	12,170	680	9,421	578
Perry MS County				
VTD: Arlington	971	104	741	71
VTD: Beaumont City Hall	374	92	304	66

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District 45 (continued)				
Perry MS County (continued)				
VTD: Beaumont Library	1,049	722	754	518
VTD: Deep Creek	221	30	171	22
VTD: Hintonville	504	140	360	93
VTD: Indian Springs (part)	571	217	425	156
VTD: Janice	1,065	115	832	87
VTD: N.A. Courthouse	548	44	426	28
VTD: New Augusta Elementary	546	304	384	204
VTD: Prospect	704	9	508	6
VTD: Richton City Hall (part)	0	0	0	0
VTD: Runnelstown (part)	99	33	66	18
VTD: Thompson Hill	175	0	134	0
Perry MS County Subtotal	6,827	1,810	5,105	1,269
Stone MS County				
VTD: American Legion (part)	384	231	222	123
VTD: Bond	280	7	203	2
VTD: Courthouse (part)	780	106	582	66
VTD: Flint Creek (part)	1,504	164	1,149	118
VTD: Ten Mile (part)	3	0	2	0
Stone MS County Subtotal	2,951	508	2,158	309
District 45 Subtotal	57,871	13,561	45,446	9,771
District 46				
Hancock MS County	43,929	3,138	33,431	2,214
Harrison MS County				
VTD: 201 (part)	0	0	0	0
VTD: 202 (part)	148	0	107	0
VTD: 212	497	5	375	4
VTD: 301 (part)	2,174	557	1,635	422
VTD: 302 (part)	0	0	0	0
VTD: 303 (part)	0	0	0	0
VTD: 304 (part)	1,992	335	1,566	247
VTD: 305	2,544	136	1,900	106
VTD: 306	1,734	33	1,275	20
VTD: 307 (part)	0	0	0	0
VTD: 314 (part)	1,674	77	1,291	54
VTD: 315	1,627	46	1,151	28
Harrison MS County Subtotal	12,390	1,189	9,300	881
District 46 Subtotal	56,319	4,327	42,731	3,095
District 47				
Harrison MS County				
VTD: 112 (part)	161	0	118	0
VTD: 113 (part)	202	5	151	2
VTD: 201 (part)	3,242	73	2,325	38
VTD: 202 (part)	1,768	45	1,327	24
VTD: 204 (part)	4,194	879	3,163	612
VTD: 210 (part)	10	0	9	0
VTD: 211 (part)	557	66	425	46
VTD: 313 (part)	2	0	2	0

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District 47 (continued)				
Harrison MS County (continued)				
VTD: 314 (part)	616	14	452	10
VTD: 409 (part)	62	42	31	18
VTD: 410 (part)	1,191	285	934	198
VTD: 411 (part)	181	133	134	101
VTD: 507 (part)	1,331	115	992	74
Harrison MS County Subtotal	13,517	1,657	10,063	1,123
Jackson MS County				
VTD: Arlington	1,245	677	836	402
VTD: Arlington A (part)	0	0	0	0
VTD: Cartersville (part)	329	12	238	7
VTD: Chico	2,133	896	1,570	603
VTD: Chico A	1,432	603	985	369
VTD: East Central (part)	2	0	2	0
VTD: Escatawpa (part)	0	0	0	0
VTD: Escatawpa A	3	0	3	0
VTD: Escatawpa B (part)	0	0	0	0
VTD: Fair	3,339	2,069	2,549	1,468
VTD: Gautier A (part)	0	0	0	0
VTD: Hickory Hills A (part)	0	0	0	0
VTD: Jefferson Street	2,280	2,023	1,705	1,497
VTD: Larue (part)	493	10	357	5
VTD: North Vancleave (part)	0	0	0	0
VTD: North Vancleave A (part)	465	0	340	0
VTD: Orange Grove A (part)	0	0	0	0
VTD: Rec Center	1,542	1,212	1,247	966
VTD: Rec Center A	88	44	73	37
VTD: Red Hill A	115	0	81	0
VTD: South Vancleave A (part)	0	0	0	0
VTD: Sue Ellen	2,371	2,211	1,879	1,746
VTD: Union Hall	2,694	2,454	1,990	1,808
VTD: Wade A (part)	193	23	149	13
VTD: YMBC/Dantzler	1,442	1,001	1,150	784
Jackson MS County Subtotal	20,166	13,235	15,154	9,705
Pearl River MS County				
VTD: Anchor Lake/West Union (part)	163	0	117	0
VTD: Caesar (part)	980	4	706	2
VTD: Derby (part)	41	0	30	0
VTD: Hide-A-Way North Hills (part)	7	0	6	0
VTD: McNeill 3 (part)	22	1	17	1
VTD: McNeill 5 (part)	18	0	13	0
VTD: Nicholson (part)	11	0	10	0
VTD: Picayune 1 East (part)	1,097	702	858	551
VTD: Picayune 1 South (part)	2,596	2,010	1,866	1,407
VTD: Picayune 2 (part)	267	100	148	54
VTD: Picayune 4 East (part)	433	20	345	12
VTD: Picayune 5 (part)	490	113	352	57
VTD: Poplarville 1 (part)	1,508	577	1,047	346
VTD: Poplarville 2 (part)	0	0	0	0

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 47 (continued)				
Pearl River MS County (continued)				
VTD: Poplarville 3 (part)	606	45	461	32
VTD: Salem (part)	3,270	94	2,397	66
VTD: Savannah (part)	696	16	543	13
VTD: Steep Hollow (part)	626	4	475	1
VTD: Sycamore (part)	667	7	507	5
VTD: Whitesand 1 (part)	566	417	414	309
Pearl River MS County Subtotal	14,064	4,110	10,312	2,856
Stone MS County				
VTD: American Legion (part)	1,266	779	861	503
VTD: Courthouse (part)	416	124	297	74
VTD: Elarbee	709	5	548	2
VTD: Flint Creek (part)	579	207	534	203
VTD: Magnolia	932	11	696	10
VTD: McHenry Fire Station (part)	543	41	412	29
VTD: McHenry Library	931	22	646	13
VTD: Old Hospital	1,188	116	927	81
VTD: Perkinson	1,341	372	1,195	354
VTD: Project Road	1,711	1,013	1,252	736
VTD: Ten Mile (part)	749	12	590	8
Stone MS County Subtotal	10,365	2,702	7,958	2,013
District 47 Subtotal	58,112	21,704	43,487	15,697
District 48				
Harrison MS County				
VTD: 206 (part)	272	39	222	22
VTD: 208 (part)	0	0	0	0
VTD: 301 (part)	0	0	0	0
VTD: 302 (part)	2,791	955	2,140	651
VTD: 303 (part)	744	246	569	170
VTD: 304 (part)	0	0	0	0
VTD: 307 (part)	1,908	149	1,479	106
VTD: 308	2,130	150	1,641	100
VTD: 309	2,311	214	1,678	121
VTD: 310	2,709	310	2,065	241
VTD: 311	3,587	258	2,650	149
VTD: 312	2,147	143	1,623	93
VTD: 313 (part)	1,451	121	1,085	84
VTD: 314 (part)	1,042	22	834	16
VTD: 401 (part)	1,249	870	889	594
VTD: 402 (part)	2,347	1,237	1,745	877
VTD: 403	568	218	480	175
VTD: 404	5,166	2,777	3,462	1,733
VTD: 405	3,531	2,685	2,495	1,826
VTD: 407	2,101	1,783	1,436	1,206
VTD: 408 (part)	1,146	701	869	495
VTD: 409 (part)	7,322	3,166	5,106	2,030
VTD: 410 (part)	4,232	1,703	3,352	1,273
VTD: 411 (part)	1,877	1,791	1,424	1,366
VTD: 412 (part)	528	408	386	304

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 48 (continued)				
Harrison MS County Subtotal	51,159	19,946	37,630	13,632
District 48 Subtotal	51,159	19,946	37,630	13,632

District 49

Harrison MS County				
VTD: 110 (part)	0	0	0	0
VTD: 203 (part)	2,210	336	1,625	244
VTD: 204 (part)	1,686	464	1,183	310
VTD: 205	542	57	466	43
VTD: 206 (part)	1,615	332	1,301	211
VTD: 207	1,692	360	1,303	216
VTD: 208 (part)	1,053	33	833	24
VTD: 209	1,899	33	1,475	21
VTD: 210 (part)	2,193	310	1,591	202
VTD: 211 (part)	7,603	1,190	5,687	787
VTD: 213 (part)	5,103	870	3,702	507
VTD: 214	3,247	301	2,547	233
VTD: 215	731	82	618	58
VTD: 303 (part)	1,116	92	935	71
VTD: 401 (part)	1	0	1	0
VTD: 402 (part)	21	9	14	6
VTD: 406 (part)	1,650	1,110	1,273	855
VTD: 408 (part)	363	159	281	118
VTD: 409 (part)	609	235	437	164
VTD: 410 (part)	0	0	0	0
VTD: 412 (part)	351	177	278	138
VTD: 502 (part)	0	0	0	0
VTD: 503	7,182	1,606	5,671	1,094
VTD: 504	2,799	343	2,237	246
VTD: 505	4,753	878	3,685	610
VTD: 506 (part)	584	21	455	17
VTD: 508 (part)	0	0	0	0
VTD: 509 (part)	5,934	1,032	4,486	711
VTD: 510	4,085	548	3,141	377
Harrison MS County Subtotal	59,022	10,578	45,225	7,263
District 49 Subtotal	59,022	10,578	45,225	7,263

District 50

Harrison MS County				
VTD: 101	265	27	222	15
VTD: 102	852	213	657	143
VTD: 103	700	368	556	285
VTD: 104	1,771	1,150	1,279	812
VTD: 105	631	115	538	96
VTD: 106	524	255	421	195
VTD: 107	1,207	272	904	142
VTD: 108	2,064	327	1,661	222
VTD: 109	3,435	530	3,279	500
VTD: 110 (part)	4,487	916	3,156	604
VTD: 111	11,373	1,738	8,358	1,123
VTD: 112 (part)	1,603	73	1,236	48
VTD: 113 (part)	352	23	255	16

Plan: senate_bench02geo10pop
Type:

Administrator:
User:
POPULATION Black [18+_Pop] [18+_Blk]

District 50 (continued)

Harrison MS County (continued)

VTD: 114	1,609	177	1,306	144
VTD: 201 (part)	0	0	0	0
VTD: 202 (part)	490	7	397	5
VTD: 203 (part)	9	0	8	0
VTD: 210 (part)	3,878	279	2,779	195
VTD: 213 (part)	0	0	0	0
VTD: 406 (part)	1	0	1	0
VTD: 501	1,263	226	931	158
VTD: 502 (part)	5,082	956	3,980	645
VTD: 506 (part)	3,791	207	2,846	139
VTD: 507 (part)	1,872	92	1,413	74
VTD: 508 (part)	3,387	56	2,556	41
VTD: 509 (part)	371	16	295	11
Harrison MS County Subtotal	51,017	8,023	39,034	5,613
District 50 Subtotal	51,017	8,023	39,034	5,613

District 51

Jackson MS County

VTD: Arlington A (part)	5	1	4	1
VTD: Big Point	3,830	27	2,797	22
VTD: Carterville (part)	0	0	0	0
VTD: East Central (part)	9,038	478	6,491	333
VTD: Eastside	1,311	524	1,094	410
VTD: Escatawpa (part)	4,303	1,057	3,337	691
VTD: Escatawpa B (part)	0	0	0	0
VTD: Fair A	132	59	99	39
VTD: Gautier (part)	0	0	0	0
VTD: Gautier A (part)	264	5	211	3
VTD: Girl Scout A	654	194	497	141
VTD: Griffin Heights	944	374	769	269
VTD: Gulf Hills	7,822	1,101	5,774	703
VTD: Gulf Hills A	3,327	380	2,500	264
VTD: Helena	2,472	166	1,945	104
VTD: Hickory Hill (part)	0	0	0	0
VTD: Hickory Hills A (part)	499	29	414	19
VTD: Hwy 57	240	0	171	0
VTD: Hwy 57 A	521	11	377	7
VTD: Larue (part)	0	0	0	0
VTD: Latimer	6,965	265	5,068	164
VTD: North Pascagoula	700	74	547	54
VTD: North Vancleave (part)	3,409	263	2,537	209
VTD: North Vancleave A (part)	0	0	0	0
VTD: Orange Grove	1,809	83	1,458	60
VTD: Orange Grove A (part)	722	275	530	190
VTD: Pinecrest	1,135	259	852	168
VTD: Presbyterian B	153	25	113	13
VTD: Red Hill	414	0	292	0
VTD: South Vancleave	4,090	101	2,995	70
VTD: South Vancleave A (part)	1,827	48	1,379	39
VTD: St. Martin	5,587	690	4,265	501

Plan: senate_bench02geo10pop
Type:

Administrator:
User:

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 51 (continued)				
Jackson MS County (continued)				
VTD: Villia Maria	728	7	658	7
VTD: Wade A <i>(part)</i>	0	0	0	0
Jackson MS County Subtotal	62,901	6,496	47,174	4,481
District 51 Subtotal	62,901	6,496	47,174	4,481
District 52				
Jackson MS County				
VTD: American Legion	816	84	632	59
VTD: Eastlawn	2,509	226	1,876	136
VTD: Fair B	105	55	76	41
VTD: Fountainbleau	6,933	1,013	4,735	563
VTD: Gautier <i>(part)</i>	8,473	2,356	6,404	1,539
VTD: Gautier A <i>(part)</i>	0	0	0	0
VTD: Gautier B	223	26	186	20
VTD: Gautier C	3,826	2,200	2,590	1,361
VTD: Girl Scout	1,373	719	977	484
VTD: Gulf Hills B	109	4	90	4
VTD: Gulf Park Estates	6,004	466	4,318	289
VTD: Gulf Park Estates A	154	4	103	4
VTD: Hickory Hill <i>(part)</i>	3,755	880	2,706	548
VTD: Nazarene	2,143	757	1,491	445
VTD: Ocean Springs Armory	5,332	455	4,215	352
VTD: Ocean Springs Civic Center	3,102	284	2,310	200
VTD: Ocean Springs Civic Center A	7,507	427	5,712	313
VTD: Ocean Springs Comm Center	454	15	387	11
VTD: Pinecrest A	1,009	119	757	80
VTD: Presbyterian	1,022	44	824	27
VTD: Presbyterian A	21	3	21	3
VTD: Sacred Heart	1,731	166	1,330	109
Jackson MS County Subtotal	56,601	10,303	41,740	6,588
District 52 Subtotal	56,601	10,303	41,740	6,588
State totals	2,967,297	1,098,385	2,211,742	767,499

EXHIBIT 5



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20530

SEP 14 2012

The Honorable Chris McDaniel
Chairperson, Mississippi Senate Elections Committee
P.O. Box 1018
Jackson, Mississippi 39215-1018

The Honorable William C. Denny, Jr.
Chairperson, Mississippi House of Representatives
Apportionment and Elections Committee
P.O. Box 12185
Jackson, Mississippi 39236-2185

Dear Senator McDaniel and Representative Denny:

This refers to Joint Resolution No. 201 (2012), which provides the 2012 redistricting plan for the Senate, and Joint Resolution No. 1 (2012), which provides the 2012 redistricting plan for the House of Representatives, for the State of Mississippi, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, 42 U.S.C. 1973c. We received your submission on July 16, 2012; additional information was received through September 11, 2012.

The Attorney General does not interpose any objection to the specified changes. However, we note that Section 5 expressly provides that the failure of the Attorney General to object does not bar subsequent litigation to enjoin the enforcement of the changes. *Procedures for the Administration of Section 5 of the Voting Rights Act of 1965*, 28 C.F.R. 51.41.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom E. Perez", is written above the typed name.

Thomas E. Perez
Assistant Attorney General

EXHIBIT 6

Mississippi Senate

Redistricting Plan: “TRP1”

Precleared by USDOJ - 09/14/2012

PROPOSED SENATE SUMMARY

POPULATION OF DISTRICTS - PLAN TRP_1

Plan Geography: Statewide

Precinct Year: 2008

Total Plan Population:
2,967,297Number of Districts:
52Ideal District Size:
57,603

Summary Statistics

	DISTRICT	TOTAL	DEVN	% DEVN.
Highest Deviation:	51	59,854	2,791	4.89%
Highest Deviation:	34	59,697	2,634	4.62%
Highest Deviation:	38	59,472	2,409	4.22%
Lowest Deviation:	12	54,310	-2,753	-4.82%
Lowest Deviation:	14	54,288	-2,775	-4.86%
Lowest Deviation:	19	54,279	-2,784	-4.88%

DISTRICTS WITH 50 PERCENT OR MORE BLACK POPULATION

DISTRICT	TOTAL	DEVN	% DEVN.	Black	%Black	[18+ Pop]	[18+ Blk]	%18+Blk
11	58,529	1,466	2.57%	42,652	72.87%	41,431	28,533	68.87%
12	54,310	-2,753	-4.82%	38,887	71.60%	39,275	26,661	67.88%
13	57,916	853	1.49%	42,053	72.61%	43,645	30,233	69.27%
16	55,307	-1,756	-3.08%	35,888	64.89%	41,131	25,289	61.48%
21	54,562	-2,501	-4.38%	37,809	69.30%	39,192	25,876	66.02%
22	58,838	1,775	3.11%	31,782	54.02%	43,883	22,280	50.77%
24	57,205	142	0.25%	43,998	76.91%	41,308	30,591	74.06%
26	56,204	-859	-1.51%	38,772	68.98%	41,885	27,902	66.62%
27	54,449	-2,614	-4.58%	40,476	74.34%	40,191	29,091	72.38%
28	57,480	417	0.73%	50,009	87.00%	39,794	33,511	84.21%
29	58,509	1,446	2.53%	33,900	57.94%	43,669	23,320	53.40%
32	59,380	2,317	4.06%	39,137	65.91%	43,603	27,098	62.15%
34	59,697	2,634	4.62%	34,941	58.53%	43,714	24,075	55.07%
36	56,599	-464	-0.81%	36,373	64.26%	43,133	26,750	62.02%
38	59,472	2,409	4.22%	38,904	65.42%	43,919	27,468	62.54%

TOTAL POPULATION BY DISTRICT

DISTRICT	TOTAL	DEVN	% DEVN.	Black	%Black	[18+ Pop]	[18+ Blk]	%18+Blk
1	58,854	1,791	3.14%	10,262	17.44%	42,781	7,050	16.48%
2	58,820	1,757	3.08%	15,873	26.99%	41,837	9,894	23.65%
3	57,746	683	1.20%	10,676	18.49%	42,731	7,539	17.64%
4	59,289	2,226	3.90%	7,765	13.10%	44,625	5,418	12.14%
5	59,452	2,389	4.19%	4,687	7.88%	45,845	3,545	7.73%
6	59,315	2,252	3.95%	8,286	13.97%	44,226	5,681	12.85%
7	56,245	-818	-1.43%	22,464	39.94%	41,431	15,369	37.10%
8	54,953	-2,110	-3.70%	18,536	33.73%	40,545	12,969	31.99%
9	58,543	1,480	2.59%	14,327	24.47%	47,008	10,434	22.20%
10	55,329	-1,734	-3.04%	22,847	41.29%	41,671	16,733	40.16%
11	58,529	1,466	2.57%	42,652	72.87%	41,431	28,533	68.87%
12	54,310	-2,753	-4.82%	38,887	71.60%	39,275	26,661	67.88%
13	57,916	853	1.49%	42,053	72.61%	43,645	30,233	69.27%
14	54,288	-2,775	-4.86%	15,931	29.35%	41,654	11,512	27.64%
15	54,994	-2,069	-3.63%	16,145	29.36%	44,003	11,889	27.02%
16	55,307	-1,756	-3.08%	35,888	64.89%	41,131	25,289	61.48%
17	54,327	-2,736	-4.79%	16,344	30.08%	41,126	11,487	27.93%
18	55,419	-1,644	-2.88%	14,446	26.07%	39,446	9,334	23.66%

DISTRICT	TOTAL	DEVN	% DEVN	Black	%Black	[18+ Pop]	[18+ Blk]	%18+Blk
19	54,279	-2,784	-4.88%	12,478	22.99%	39,206	8,428	21.50%
20	57,094	31	0.05%	8,180	14.33%	42,982	5,721	13.31%
21	54,562	-2,501	-4.38%	37,809	69.30%	39,192	25,876	66.02%
22	58,838	1,775	3.11%	31,782	54.02%	43,883	22,280	50.77%
23	56,594	-469	-0.82%	25,580	45.20%	41,965	17,626	42.00%
24	57,205	142	0.25%	43,998	76.91%	41,308	30,591	74.06%
25	59,203	2,140	3.75%	10,867	18.36%	43,875	7,481	17.05%
26	56,204	-859	-1.51%	38,772	68.98%	41,885	27,902	66.62%
27	54,449	-2,614	-4.58%	40,476	74.34%	40,191	29,091	72.38%
28	57,480	417	0.73%	50,009	87.00%	39,794	33,511	84.21%
29	58,509	1,446	2.53%	33,900	57.94%	43,669	23,320	53.40%
30	55,905	-1,158	-2.03%	13,170	23.56%	42,173	9,672	22.93%
31	56,647	-416	-0.73%	17,721	31.28%	41,565	12,345	29.70%
32	59,380	2,317	4.06%	39,137	65.91%	43,603	27,098	62.15%
33	55,637	-1,426	-2.50%	15,209	27.34%	42,892	10,945	25.52%
34	59,697	2,634	4.62%	34,941	58.53%	43,714	24,075	55.07%
35	58,571	1,508	2.64%	15,592	26.62%	43,147	10,780	24.98%
36	56,599	-464	-0.81%	36,373	64.26%	43,133	26,750	62.02%
37	55,264	-1,799	-3.15%	19,933	36.07%	42,495	14,192	33.40%
38	59,472	2,409	4.22%	38,904	65.42%	43,919	27,468	62.54%
39	56,423	-640	-1.12%	16,567	29.36%	41,896	11,709	27.95%
40	58,920	1,857	3.25%	11,122	18.88%	44,205	7,842	17.74%
41	55,793	-1,270	-2.23%	19,466	34.89%	41,556	13,541	32.58%
42	55,650	-1,413	-2.48%	8,590	15.44%	41,730	5,877	14.08%
43	57,725	662	1.16%	13,649	23.64%	43,075	9,998	23.21%
44	54,387	-2,676	-4.69%	10,419	19.16%	40,273	6,983	17.34%
45	54,580	-2,483	-4.35%	13,272	24.32%	42,733	9,779	22.88%
46	57,739	676	1.18%	4,323	7.49%	43,658	3,079	7.05%
47	58,759	1,696	2.97%	9,901	16.85%	43,985	6,921	15.73%
48	58,961	1,898	3.33%	21,501	36.47%	43,721	14,721	33.67%
49	57,821	758	1.33%	9,600	16.60%	43,999	6,562	14.91%
50	56,513	-550	-0.96%	9,107	16.11%	43,305	6,364	14.70%
51	59,854	2,791	4.89%	14,824	24.77%	44,978	10,878	24.19%
52	58,947	1,884	3.30%	13,144	22.30%	43,626	8,523	19.54%

Ver:1.0 Out/Rev date: 04/30/12 Jason Knight

MS Joint Reapportionment Committee - Ben Collins, OpsCoord

Plan: TRP_1
 Plan Type:
 Administrator:
 User: Jason Knight/Ben Collins

Plan Components Report

Monday, April 30, 2012

8:11 AM

	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 1				
DeSoto MS County				
VTD: Aldens <i>(part)</i>	4,185	1,075	3,155	754
VTD: Alhaba Cockrum	1,533	64	1,108	54
VTD: Bridgetown	3,253	303	2,461	223
VTD: DeSoto Central	10,431	2,425	7,069	1,529
VTD: Endora	2,991	257	2,300	190
VTD: Hernando Central	4,681	435	3,320	298
VTD: Hernando East	7,549	477	5,544	348
VTD: Hernando West	4,362	977	3,158	719
VTD: Horn Lake South <i>(part)</i>	3,205	669	2,481	470
VTD: Lake Cormorant	1,119	208	800	140
VTD: Lewisburg East	820	45	609	25
VTD: Lewisburg West	1,851	335	1,317	248
VTD: Love	2,093	211	1,637	159
VTD: Nesbit East	1,577	465	1,214	358
VTD: Nesbit West	2,743	427	2,121	353
VTD: Oak Grove	565	50	419	42
VTD: Walls	5,896	1,839	4,068	1,140
DeSoto MS County Subtotal	58,854	10,262	42,781	7,050
District 1 Subtotal	58,854	10,262	42,781	7,050
District 2				
DeSoto MS County				
VTD: Aldens <i>(part)</i>	410	9	304	6
VTD: Cherry Valley	2,612	327	1,900	179
VTD: Elmore	1,543	210	1,242	138
VTD: Greenbrook North	5,490	1,699	3,900	1,137
VTD: Greenbrook South	8,196	1,060	6,011	679
VTD: Horn Lake Central	3,122	754	2,230	481
VTD: Horn Lake East	4,569	1,722	3,143	1,063
VTD: Horn Lake Intermediate School	4,643	1,502	3,173	917
VTD: Horn Lake North	5,461	2,154	3,617	1,305
VTD: Horn Lake South <i>(part)</i>	1,072	131	828	84
VTD: Horn Lake West	4,834	1,585	3,243	931
VTD: Plum Point	3,377	526	2,624	374
VTD: Southhaven North	5,203	1,171	3,707	650
VTD: Southhaven South	3,535	1,756	2,451	1,083
VTD: Southhaven West	4,753	1,267	3,464	867
DeSoto MS County Subtotal	58,820	15,873	41,837	9,894
District 2 Subtotal	58,820	15,873	41,837	9,894
District 3				
Benton MS County	8,729	3,252	6,572	2,322

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+ Pop]	[18+ Blk]
District 3 (continued)				
Pontotoc MS County				
VTD: Bankhead	976	264	731	197
VTD: Bethel	1,322	221	987	165
VTD: Buchanan	1,203	47	847	27
VTD: Cherry Creek	1,173	68	827	43
VTD: Ecu	1,442	158	1,027	120
VTD: Friendship	920	71	679	47
VTD: Hoyle	1,248	447	955	342
VTD: Hurricane	855	7	661	4
VTD: Longview	549	241	424	181
VTD: Oak Hill	512	51	374	36
VTD: Pontotoc 1	364	30	266	16
VTD: Pontotoc 2	1,395	169	933	93
VTD: Pontotoc 3	1,664	267	1,208	158
VTD: Pontotoc 4	1,410	301	1,002	219
VTD: Pontotoc 5	3,790	807	2,784	552
VTD: Sherman	822	112	620	66
VTD: Turnpike	784	32	594	25
VTD: Woodland	429	18	326	13
VTD: Zion	1,025	178	770	136
Pontotoc MS County Subtotal	21,883	3,489	16,015	2,440
Union MS County	27,134	3,935	20,144	2,777
District 3 Subtotal	57,746	10,676	42,731	7,539
District 4				
Alcorn MS County	37,057	4,221	28,036	2,928
Tippah MS County	22,232	3,544	16,589	2,490
District 4 Subtotal	59,289	7,765	44,625	5,418
District 5				
Itawamba MS County				
VTD: Armory	1,380	66	1,041	35
VTD: Bounds	76	0	57	0
VTD: Clay	1,381	11	1,060	11
VTD: Copeland	993	1	739	1
VTD: Friendship	827	17	615	10
VTD: Fulton Dist.1 Courthouse	1,376	237	1,222	234
VTD: Fulton Dist.4 Am. Legion	2,378	144	1,924	102
VTD: Fulton Dist.5 Firestation	897	169	705	130
VTD: Mantachie	1,840	27	1,394	16
VTD: Mt. Gilead	304	0	223	0
VTD: Ozark	187	0	136	0
VTD: Pineville	1,476	0	1,152	0
VTD: Pleasanton	256	0	196	0
VTD: Ryan	667	0	521	0
VTD: Tilden	545	8	414	8
Itawamba MS County Subtotal	14,583	680	11,399	547
Prentiss MS County	25,276	3,488	19,391	2,600
Tishomingo MS County	19,593	519	15,055	398
District 5 Subtotal	59,452	4,687	45,845	3,545

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 6				
Itawamba MS County				
VTD: Centerville	697	34	526	30
VTD: Fawn Grove	1,065	3	785	3
VTD: Kirkville	1,153	0	869	0
VTD: Ratliff	456	0	333	0
Itawamba MS County Subtotal	3,371	37	2,513	33
Lee MS County				
VTD: Auburn	2,571	49	1,935	32
VTD: Baldwin	1,483	575	1,177	431
VTD: Beech Springs	1,214	255	959	186
VTD: Belden	3,106	748	2,325	526
VTD: Birmingham Ridge	1,903	136	1,378	92
VTD: Bissell	5,342	508	4,109	353
VTD: Blair	2,109	294	1,510	212
VTD: Corrona	628	0	454	0
VTD: Davis Box	330	138	246	96
VTD: East Heights	721	79	559	52
VTD: Eggville	629	3	491	3
VTD: Euclautubba	537	5	400	3
VTD: Fellowship	1,316	54	948	33
VTD: Flowerdale	777	42	560	39
VTD: Friendship	413	20	315	13
VTD: Gilvo 1	231	10	189	8
VTD: Gilvo 5	310	5	242	4
VTD: Guntown	1,782	287	1,278	190
VTD: Hebron	786	8	599	5
VTD: Mooreville 1	1,990	28	1,391	20
VTD: Mooreville 5	961	15	737	12
VTD: Oak Hill	2,949	446	2,263	315
VTD: Palmetto A & B (part)	895	104	664	68
VTD: Pratts	699	35	527	22
VTD: Richmond	935	109	706	89
VTD: Saltillo	4,608	367	3,304	239
VTD: Tupelo 1	781	4	598	4
VTD: Tupelo 2 (part)	5,492	1,087	4,064	692
VTD: Tupelo 3 (part)	6,571	1,610	4,936	1,059
VTD: Tupelo 4 North (part)	168	48	140	38
VTD: Tupelo 5	2,573	1,169	1,919	805
VTD: Unity	1,134	11	790	7
Lee MS County Subtotal	55,944	8,249	41,713	5,648
District 6 Subtotal	59,315	8,286	44,226	5,681
District 7				
Itawamba MS County				
VTD: Bigbee Fork	314	7	225	5
VTD: Cardsville	343	5	266	5
VTD: Carolina	679	82	519	60
VTD: Dorsey	1,048	3	788	3
VTD: Evergreen	722	256	531	179
VTD: Greenwood	758	244	545	166

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+ Pop]	[18+ Blk]
District 7 (continued)				
Itawamba MS County (continued)				
VTD: Hampton	82	1	71	1
VTD: James Creek	139	0	114	0
VTD: New Salem	273	59	208	51
VTD: Oakland	265	8	199	3
VTD: Tremont	513	7	384	5
VTD: Turon	134	0	106	0
VTD: Wigginton	177	2	133	2
Itawamba MS County Subtotal	5,447	674	4,089	480
Lee MS County				
VTD: Brewer	689	50	540	33
VTD: Kedron	939	230	703	180
VTD: Nettleton	1,787	224	1,322	159
VTD: Palmetto A & B (part)	71	43	40	17
VTD: Petersburg	658	83	484	61
VTD: Plantersville	1,884	813	1,485	611
VTD: Tupelo 2 (part)	655	363	456	229
VTD: Tupelo 3 (part)	1,803	1,012	1,247	618
VTD: Tupelo 4 North (part)	4,746	3,391	3,225	2,187
VTD: Tupelo 4 South	4,086	3,254	2,656	2,076
VTD: Verona	2,972	1,690	2,172	1,126
Lee MS County Subtotal	20,290	11,153	14,330	7,297
Monroe MS County				
VTD: Aberdeen 3	1,601	692	1,269	473
VTD: Amory 1	1,368	75	1,060	52
VTD: Amory 2	4,217	672	3,228	451
VTD: Amory 5	1,405	1,344	974	940
VTD: Becker	2,244	196	1,707	132
VTD: Bigbee 1	454	15	356	13
VTD: Boyds	835	13	649	7
VTD: Central Grove	839	513	608	363
VTD: Darracott	233	69	195	48
VTD: Gibson	823	603	596	459
VTD: Hatley	2,785	108	2,147	88
VTD: Nettleton (28095503)	2,026	693	1,521	526
VTD: North Aberdeen 4	2,064	1,442	1,565	1,029
VTD: Parham	627	57	485	41
VTD: Prairie	1,062	851	778	634
VTD: Smithville	2,099	114	1,583	88
VTD: South Aberdeen 4	2,421	2,027	1,721	1,399
VTD: Williams	210	0	166	0
VTD: Willis	1,245	881	934	656
VTD: Wren	1,950	272	1,470	193
Monroe MS County Subtotal	30,508	10,637	23,012	7,592
District 7 Subtotal	56,245	22,464	41,431	15,369
District 8				
Calhoun MS County	14,962	4,149	11,223	2,931
Chickasaw MS County	17,392	7,319	12,820	5,114

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 8 (continued)				
Lee MS County				
VTD: Old Union	1,010	458	736	314
VTD: Palmetto A & B <i>(part)</i>	2,395	1,251	1,630	772
VTD: Pleasant Grove	1,918	900	1,434	667
VTD: Shannon	1,353	608	961	423
Lee MS County Subtotal	6,676	3,217	4,761	2,176
Pontotoc MS County				
VTD: Algoma	875	140	631	103
VTD: Beckham	1,177	103	858	79
VTD: Judah	554	2	404	2
VTD: North Randolph	658	3	462	2
VTD: Robbs	459	32	350	20
VTD: South Randolph	608	8	419	6
VTD: Springville	1,109	115	783	79
VTD: Thaxton	973	80	724	58
VTD: Toccopola	471	22	348	17
VTD: Troy	1,190	137	883	96
Pontotoc MS County Subtotal	8,074	642	5,862	462
Yalobusha MS County				
VTD: Coffeeville 4	876	671	662	495
VTD: One North	1,939	485	1,479	325
VTD: One South	819	313	618	227
VTD: Three North West	1,738	361	1,333	247
VTD: Two Water Valley	2,477	1,379	1,787	992
Yalobusha MS County Subtotal	7,849	3,209	5,879	2,286
District 8 Subtotal	54,953	18,536	40,545	12,969
District 9				
Lafayette MS County	47,351	11,201	38,591	8,346
Panola MS County				
VTD: Batesville 3	1,083	278	819	202
VTD: Cold Springs	363	273	251	184
VTD: Coles Point	901	15	700	7
VTD: East Batesville 4	930	191	704	121
VTD: East Batesville 5	2,195	361	1,681	254
VTD: East Sardis	1,006	160	820	102
VTD: North Batesville A	1,714	718	1,230	451
VTD: North Springport	1,902	552	1,391	362
VTD: Pleasant Mount	1,098	578	821	405
Panola MS County Subtotal	11,192	3,126	8,417	2,088
District 9 Subtotal	58,543	14,327	47,008	10,434
District 10				
Marshall MS County				
VTD: Bethlehem	681	65	493	53
VTD: Chulahoma	930	716	715	542
VTD: Cornersville	279	4	224	3
VTD: Early Grove	519	289	385	197
VTD: Hudsonville	651	362	508	279
VTD: Laws Hill	402	177	299	125

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 10 (continued)				
Marshall MS County (continued)				
VTD: Marianna	1,079	594	833	445
VTD: Mt. Pleasant	1,932	505	1,491	359
VTD: N. Holly Springs Dist. 1	3,527	2,862	2,993	2,396
VTD: N. Holly Springs Dist. 2	1,490	1,125	1,060	751
VTD: Potts Camp	1,926	602	1,408	425
VTD: Redbanks	1,875	503	1,428	365
VTD: Slayden	1,074	407	836	316
VTD: South Holly Springs	2,942	1,779	2,207	1,236
VTD: Wall Hill	1,550	912	1,150	676
VTD: Warsaw	1,540	663	1,120	472
VTD: Waterford	1,069	446	816	339
VTD: Watson	971	328	771	259
VTD: West Holly Springs	2,006	1,753	1,507	1,301
Marshall MS County Subtotal	26,443	14,092	20,244	10,539
Tate MS County	28,886	8,755	21,427	6,194
District 10 Subtotal	55,329	22,847	41,671	16,733
District 11				
Coahoma MS County				
VTD: Clarksdale 1-4	2,180	1,529	1,531	986
VTD: Clarksdale 2-4	3,800	2,329	2,682	1,470
VTD: Clarksdale 3-3	1,289	1,169	904	804
VTD: Clarksdale 3-4	1,803	1,701	1,215	1,125
VTD: Clarksdale 4-2	4,337	4,169	2,899	2,781
VTD: Clarksdale 4-3	582	329	461	248
VTD: Clarksdale 5-4	4,008	3,195	2,767	2,079
VTD: Jonestown	1,495	1,435	1,017	969
VTD: Lyons	1,857	763	1,381	514
Coahoma MS County Subtotal	21,351	16,619	14,857	10,976
Panola MS County				
VTD: Como	2,760	2,028	2,073	1,457
VTD: Courtland	2,612	1,752	1,866	1,197
VTD: Crenshaw	1,193	685	861	457
VTD: Curtis	1,067	822	778	578
VTD: Enon	359	87	252	54
VTD: Longtown	692	386	484	243
VTD: Macedonia-Concord	470	378	345	278
VTD: North Batesville B	2,761	2,391	1,757	1,485
VTD: Pleasant Grove	493	166	390	123
VTD: South Sardis	2,575	1,854	1,833	1,226
VTD: Tocowa	1,707	485	1,252	332
VTD: West Sardis	1,488	1,357	1,052	941
Panola MS County Subtotal	18,177	12,391	12,943	8,371
Quitman MS County	8,223	5,724	6,070	4,000
Tunica MS County	10,778	7,918	7,561	5,186
District 11 Subtotal	58,529	42,652	41,431	28,533
District 12				
Bolivar MS County				

Plan: TRP 1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 12 (continued)				
Bolivar MS County (continued)				
VTD: Benoit	893	648	626	419
VTD: Beulah	410	354	281	234
VTD: Duncan/Alligator	787	563	589	396
VTD: East Rosedale	1,362	1,233	914	811
VTD: Gunnison	797	566	560	365
VTD: Pace	1,168	815	994	675
VTD: Scott	301	156	234	124
VTD: Stringtown	114	45	89	36
VTD: West Rosedale	586	428	458	327
Bolivar MS County Subtotal	6,418	4,808	4,745	3,387
Coahoma MS County				
VTD: Bobo	370	199	283	151
VTD: Cagle Crossing	171	50	136	42
VTD: Coahoma	487	460	332	310
VTD: Dublin	469	160	377	135
VTD: Farrell	358	278	254	193
VTD: Friar's Point	1,647	1,520	1,182	1,081
VTD: Lula	713	303	597	244
VTD: Rena Lara	366	55	303	44
VTD: Roundaway	158	73	115	56
VTD: Sherard	61	35	51	32
Coahoma MS County Subtotal	4,800	3,133	3,630	2,288
Washington MS County				
VTD: American Legion	3,192	2,561	2,227	1,680
VTD: Brent Center	1,755	1,721	1,209	1,187
VTD: Buster Brown Comm. Center	3,660	2,925	2,505	1,886
VTD: Christ Wesleyan Methodist Church	3,986	1,746	2,946	1,141
VTD: Elks Club	4,714	4,276	3,313	2,954
VTD: Extension Building	2,182	2,121	1,492	1,447
VTD: Grace Methodist Church	3,481	2,540	2,512	1,691
VTD: Greenville Ind. College	3,024	2,931	2,238	2,153
VTD: Leland Rotary Club	2,629	1,658	1,965	1,149
VTD: Metcalf City Hall	1,069	1,018	697	666
VTD: Potter House Church	1,689	1,593	1,177	1,095
VTD: St. James Epis. Church	4,651	2,878	3,436	1,963
VTD: Swiftwater Baptist Church	1,324	104	991	83
VTD: Tampa Drive	1,417	859	997	564
VTD: Wards Recreation Center	4,319	2,015	3,195	1,327
Washington MS County Subtotal	43,092	30,946	30,900	20,986
District 12 Subtotal	54,310	38,887	39,275	26,661
District 13				
Bolivar MS County				
VTD: Boyle	3,202	1,662	2,337	1,162
VTD: Cleveland Courthouse	627	62	518	36
VTD: Cleveland Eastgate	1,249	1,217	886	857
VTD: East Central Cleveland	782	779	552	549
VTD: East Cleveland	2,917	2,482	2,241	1,841
VTD: Merigold	659	291	488	211

Plan: TRP_1
Type:

Administrator:
User: Jason Knight/Ben Collins
POPULATION Black [18+_Pop] [18+_Blk]

District 13 (continued)**Bolivar MS County (continued)**

VTD: Mound Bayou	2,683	2,520	1,965	1,836
VTD: North Cleveland	1,656	1,298	1,151	885
VTD: Renova	396	363	285	264
VTD: Shaw	2,401	1,993	1,807	1,448
VTD: Shelby	2,360	2,195	1,597	1,456
VTD: South Cleveland	1,037	929	660	570
VTD: West Central Cleveland	1,140	146	891	86
VTD: Winstonville	122	92	100	77

Bolivar MS County Subtotal

21,231	16,029	15,478	11,278
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Sunflower MS County

29,450	21,479	22,303	15,578
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Tallahatchie MS County

VTD: Brazil	131	65	93	44
VTD: Charleston Beat 2	1,721	1,256	1,244	858
VTD: Sumner Beat 2	316	63	245	40
VTD: Sumner Beat 5	374	244	283	177
VTD: Tutwiler	3,677	1,988	3,286	1,613
VTD: Webb Beat 2	311	266	199	166
VTD: Webb Beat 5	705	663	514	479

Tallahatchie MS County Subtotal

7,235	4,545	5,864	3,377
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District 13 Subtotal

57,916	42,053	43,645	30,233
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District 14**Attala MS County**

VTD: Berea	258	32	189	26
VTD: Carmack	430	4	328	3
VTD: Ethel	730	247	553	176
VTD: Hesterville	506	38	375	27
VTD: Liberty Chapel	532	135	382	95
VTD: McCool	482	157	378	114
VTD: Providence	634	82	510	63
VTD: Thompson	315	27	230	16
VTD: Williamsville	2,002	656	1,535	495
VTD: Zama	561	147	430	106

Attala MS County Subtotal

6,450	1,525	4,910	1,121
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Carroll MS County

10,597	3,461	8,314	2,600
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Grenada MS County

VTD: Elliott	1,012	178	716	96
VTD: Fuftheyville	1,291	304	964	222
VTD: Geeslin	1,056	164	825	130
VTD: Gore Springs	650	188	500	146
VTD: Grenada Box 1	1,256	114	957	76
VTD: Hardy	719	35	546	28
VTD: Mt. Nebo	312	39	253	27
VTD: Pleasant Grove	850	428	687	341
VTD: Providence (28043204)	373	25	281	19
VTD: Tie Plant	1,985	874	1,480	608

Grenada MS County Subtotal

9,504	2,349	7,209	1,693
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Leflore MS County

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 14 (continued)				
Leflore MS County (continued)				
VTD: Money	286	87	237	73
VTD: North Greenwood (<i>part</i>)	4,488	401	3,529	266
Leflore MS County Subtotal	4,774	488	3,766	339
Montgomery MS County				
VTD: Alva	86	36	68	24
VTD: Duck Hill	969	404	750	304
VTD: Mt. Pisgah	381	63	315	52
VTD: North Duck Hill	286	187	215	138
VTD: North Mt. Pisgah - Sweethome	204	87	164	63
VTD: North Winona	1,803	330	1,415	236
VTD: South Winona	1,698	1,200	1,235	853
VTD: Southeast Winona	27	0	19	0
VTD: West Winona	1,377	406	1,035	287
Montgomery MS County Subtotal	6,831	2,713	5,216	1,957
Panola MS County				
VTD: Eureka	2,017	367	1,529	256
VTD: Pope	1,347	421	988	306
VTD: South Springport	1,974	570	1,486	409
Panola MS County Subtotal	5,338	1,358	4,003	971
Tallahatchie MS County				
VTD: Cascilla	372	52	305	44
VTD: Charleston Beat 1	1,551	977	1,079	617
VTD: Charleston Beat 3	720	428	559	317
VTD: Enid	600	196	461	144
VTD: Leverette	378	154	286	104
VTD: Murphreesboro	412	87	321	69
VTD: Paynes	800	346	580	232
VTD: Rosebloom	211	6	170	6
VTD: Springhill	308	38	241	30
VTD: Teasdale	613	157	457	105
Tallahatchie MS County Subtotal	5,965	2,441	4,459	1,668
Yalobusha MS County				
VTD: Coffeeville 5	1,211	411	926	285
VTD: Oakland	1,588	768	1,241	558
VTD: Scobey	389	111	314	92
VTD: Skuna-Vanns	326	73	278	59
VTD: Sylva Rena	941	170	747	126
VTD: Tillatoba	374	63	271	43
Yalobusha MS County Subtotal	4,829	1,596	3,777	1,163
District 14 Subtotal	54,288	15,931	41,654	11,512
District 15				
Choctaw MS County				
VTD: East Winona	1,025	769	685	483
VTD: Kilmichael	1,581	947	1,182	668
VTD: Lodi	355	288	281	225
VTD: Nations	529	57	409	47

Plan: TRP 1	Administrator: Jason Knight/Ben Collins			
Type:	User: POPULATION Black [18+ Pop] [18+ Blk]			
District 15 (continued)				
Montgomery MS County (continued)				
VTD: North Kilmicheal	194	162	144	115
VTD: Poplar Creek	215	11	179	11
VTD: Stewart	195	20	159	14
Montgomery MS County Subtotal	4,094	2,254	3,039	1,563
Oktibbeha MS County				
VTD: Bradley	339	95	267	67
VTD: Central Starkville	3,106	1,738	2,474	1,210
VTD: Craig Springs	256	14	205	6
VTD: Double Springs	427	41	345	28
VTD: East Starkville	3,236	715	3,125	693
VTD: Gillespie Street Center (<i>part</i>)	2,284	472	1,952	385
VTD: Maben	706	439	495	279
VTD: North Longview	1,085	189	826	135
VTD: Northeast Starkville	3,273	659	3,114	648
VTD: Self Creek	577	89	451	63
VTD: South Adairton	614	186	454	125
VTD: South Longview	362	95	289	73
VTD: South Starkville	6,669	1,700	5,325	1,201
VTD: Sturgis	1,171	264	934	214
VTD: West Starkville	7,995	2,581	6,564	1,905
Oktibbeha MS County Subtotal	32,100	9,277	26,820	7,032
Webster MS County	10,253	2,040	7,674	1,427
District 15 Subtotal	54,994	16,145	44,003	11,889
District 16				
Clay MS County	20,634	12,017	15,332	8,392
Lowndes MS County				
VTD: Coleman A	550	520	369	344
VTD: Coleman B	212	203	152	146
VTD: Fairgrounds A	2,213	2,086	1,302	1,206
VTD: Fairgrounds D	855	607	657	449
VTD: Hunt A	2,570	2,448	1,835	1,750
VTD: Hunt B	276	276	221	221
VTD: Mitchell A	2,446	2,002	1,795	1,429
VTD: Mitchell B	240	217	173	160
VTD: Plum Grove C	0	0	0	0
VTD: Propst Park Community Hut	1,157	1,017	906	778
VTD: Union Academy A	1,160	981	876	729
VTD: West Lowndes B (<i>part</i>)	254	75	207	61
Lowndes MS County Subtotal	11,933	10,432	8,493	7,273
Noxubee MS County				
VTD: Brooksville	2,298	1,580	1,687	1,113
VTD: Central District 3	2,519	1,994	1,804	1,386
VTD: Cliftonville	650	568	475	409
VTD: Noxubee Cnty Vo-Tech Cen.	804	462	562	338
VTD: Prairie Point	898	681	633	488
Noxubee MS County Subtotal	7,169	5,285	5,161	3,734
Oktibbeha MS County				

Plan: TRP_1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+ _Pop]

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District 16 (continued)

Oktibbeha MS County (continued)

VTD: Bell Schoolhouse	505	328	387	242
VTD: Center Grove	440	227	329	166
VTD: Gillespie Street Center <i>(part)</i>	1,617	1,103	1,144	723
VTD: Hickory Grove	3,380	1,245	2,848	935
VTD: North Adaton	426	153	342	117
VTD: North Starkville 2	1,757	1,083	1,381	832
VTD: North Starkville 3	3,250	1,165	2,517	776
VTD: Oktoe	1,055	762	835	584
VTD: Osborn	1,450	946	1,084	690
VTD: Sessums	1,353	949	1,032	685
VTD: Southeast Oktibbeha	338	193	246	140
Oktibbeha MS County Subtotal	15,571	8,154	12,145	5,890
District 16 Subtotal	55,307	35,888	41,131	25,289

District 17

Lowndes MS County

VTD: Air Base A	679	183	492	122
VTD: Air Base B	1,773	854	1,286	597
VTD: Air Base C	1,354	146	972	99
VTD: Air Base D	121	18	90	15
VTD: Air Base E	45	10	33	6
VTD: Artesia	599	456	430	325
VTD: Brandon A	3,171	1,114	2,575	841
VTD: Brandon B	537	110	487	101
VTD: Brandon C	238	69	198	52
VTD: Brandon D	48	12	34	7
VTD: Caledonia	5,162	483	3,737	370
VTD: Columbus High School A	1,831	1,308	1,316	872
VTD: Columbus High School B	1,255	368	1,055	267
VTD: Columbus High School C	262	134	210	92
VTD: Columbus High School D	145	106	123	89
VTD: Crawford A	1,532	1,254	1,102	878
VTD: Dowdle Gas Training Center B	564	196	437	136
VTD: Fairgrounds F	118	75	82	48
VTD: Fairgrounds G	46	40	32	28
VTD: Fairgrounds B	1,150	690	834	492
VTD: Fairgrounds C	1,317	1,065	823	613
VTD: Fairgrounds E	169	138	126	100
VTD: Hunt C	143	129	102	90
VTD: Lee Middle School	4,921	818	3,899	581
VTD: New Hope A	2,955	249	2,146	164
VTD: New Hope B	2,385	355	1,708	245
VTD: New Hope C	1,595	261	1,264	200
VTD: New Hope D	386	19	297	12
VTD: New Hope E	165	48	122	36
VTD: New Hope F	0	0	0	0
VTD: Plum Grove A	631	541	479	410
VTD: Plum Grove B	10	0	10	0
VTD: Rural Hill A	2,209	605	1,623	390
VTD: Rural Hill B	1,181	255	889	185

Plan: TRP_1
Type:

Administrator:
User: Jason Knight/Ben Collins
POPULATION Black [18+ _Pop] [18+ _Blk]

District 17 (continued)

Lowndes MS County (continued)				
VTD: Rural Hill C	216	10	164	7
VTD: Sale A	587	368	458	266
VTD: Sale B	293	137	251	103
VTD: Sale C	319	109	244	79
VTD: Steens A	917	103	697	80
VTD: Steens B	83	10	67	6
VTD: Steens C	878	249	663	175
VTD: Trinity A	1,005	583	802	414
VTD: Trinity B	832	476	631	294
VTD: Union Academy B	504	371	384	271
VTD: Union Academy C	385	167	292	110
VTD: University A	1,748	495	1,473	364
VTD: University B	73	48	60	36
VTD: West Lowndes A	944	263	743	185
VTD: West Lowndes B (part)	365	63	289	41
Lowndes MS County Subtotal	47,846	15,561	36,231	10,894
Monroe MS County				
VTD: Athens	614	89	436	71
VTD: Bartahatchie	615	2	485	2
VTD: Greenwood Springs	1,079	17	788	11
VTD: Hamilton	2,601	457	1,971	352
VTD: Lackey	1,572	218	1,215	157
Monroe MS County Subtotal	6,481	783	4,895	593
District 17 Subtotal	54,327	16,344	41,126	11,487

District 18

Leake MS County				
VTD: East Carthage	1,673	356	1,261	245
VTD: Ebenezer	897	473	645	346
VTD: Edinburg	1,063	5	752	4
VTD: Freeny	1,249	59	885	40
VTD: Madden	1,168	160	887	115
VTD: North Carthage	2,160	592	1,470	359
VTD: Reufroe	800	98	612	72
VTD: Salem	858	133	633	96
VTD: Singleton	1,512	458	1,095	308
VTD: South Carthage	1,150	384	922	334
VTD: Sunrise	719	20	538	18
VTD: Walnut Grove	3,151	2,309	1,484	1,000
Leake MS County Subtotal	16,400	5,047	11,184	2,937
Neshoba MS County	29,676	6,207	21,161	4,058
Winston MS County				
VTD: East Winston	1,134	259	889	186
VTD: Lovorn Tractor (part)	701	269	553	195
VTD: Mars Hill	1,193	496	911	373
VTD: Nanih Waiya	2,110	364	1,526	272
VTD: New National Guard Armory	393	99	285	54
VTD: Noxapater	1,748	595	1,334	444

Plan: TRP_1

Type:

Administrator:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+ _Pop]

[18+ _Blk]

District 18 (continued)

Winston MS County (continued)

VTD: Shiloh	824	230	659	169
VTD: Wathall <i>(part)</i>	309	70	256	54
VTD: Zion Ridge	931	810	688	592
Winston MS County Subtotal	9,343	3,192	7,101	2,339
District 18 Subtotal	55,419	14,446	39,446	9,334

District 19

DeSoto MS County

VTD: Fairhaven	3,615	1,116	2,505	743
VTD: Hack's Cross	5,828	1,205	4,047	792
VTD: Ingram's Mill	2,437	492	1,795	386
VTD: Miller	5,233	1,211	3,620	833
VTD: Mineral Wells	3,560	775	2,597	506
VTD: Olive Branch North	8,280	2,363	5,974	1,505
VTD: Olive Branch South	5,650	643	4,079	397
VTD: Olive Branch West	2,666	669	1,942	444
VTD: Pleasant Hill North	3,769	417	2,683	286
VTD: Pleasant Hill South	2,540	240	1,767	166
DeSoto MS County Subtotal	43,578	9,131	31,009	6,058

Marshall MS County

VTD: Barton	1,813	141	1,514	113
VTD: Byhalia	4,175	1,248	3,197	896
VTD: Cayce	1,902	875	1,427	618
VTD: North Cayce	1,827	587	1,334	384
VTD: Victoria	984	496	725	359
Marshall MS County Subtotal	10,701	3,347	8,197	2,370
District 19 Subtotal	54,279	12,478	39,206	8,428

District 20

Rankin MS County

VTD: Castlewoods	4,306	475	3,140	312
VTD: Castlewoods West	2,600	260	2,050	191
VTD: Crossroads	1,108	95	812	61
VTD: East Crossgates	3,862	376	3,020	247
VTD: Fannin	2,269	391	1,643	274
VTD: Flowood	1,727	439	1,494	344
VTD: Grant's Ferry	5,213	532	3,793	353
VTD: Holbrook	7,499	784	5,634	536
VTD: Leesburg	1,359	104	992	80
VTD: Mullins	1,180	698	867	506
VTD: Northeast Brandon	2,251	554	1,613	386
VTD: Northshore	3,637	320	2,638	227
VTD: Oakdale	4,644	711	3,319	467
VTD: Pelahatchie	3,618	787	2,695	571
VTD: Pisgah	2,486	1,029	1,794	741
VTD: Reservoir East	2,234	81	1,782	48
VTD: Reservoir West	3,081	252	2,459	160
VTD: South Crossgates	1,418	68	1,190	49
VTD: West Crossgates	2,602	224	2,047	168
Rankin MS County Subtotal	57,094	8,180	42,982	5,721

Plan: TRP_1

Type:

Administrator:

User:

Jason Knight/Ben Collins

	POPULATION	Black	[18+ Pop]	[18+ Blk]
District 20 Subtotal	57,094	8,180	42,982	5,721
District 21				
Attala MS County				
VTD: Aponaug	492	125	373	98
VTD: East	1,701	422	1,269	277
VTD: McAdams	622	379	473	269
VTD: Newport	585	305	461	224
VTD: North Central	573	86	410	62
VTD: Northeast	2,378	1,733	1,656	1,182
VTD: Northwest	2,275	1,173	1,574	735
VTD: Possumneck	418	170	316	119
VTD: Sallis	1,463	1,009	1,078	715
VTD: South Central	1,922	776	1,425	547
VTD: Southwest	685	505	533	377
Attala MS County Subtotal	13,114	6,683	9,568	4,605
Holmes MS County				
VTD: Beat 4 Walden Chapel	429	403	300	276
VTD: Coxburg	317	106	243	73
VTD: Durant	2,678	2,148	1,836	1,394
VTD: Ebenezer	583	454	426	317
VTD: Goodman	1,879	1,479	1,426	1,048
VTD: Pickens	1,418	1,219	1,024	872
VTD: West	958	697	709	497
Holmes MS County Subtotal	8,262	6,506	5,964	4,477
Leake MS County				
VTD: Conway	1,029	701	716	472
VTD: Good Hope	1,106	268	876	213
VTD: Lena	799	491	614	367
VTD: Ofahoma	734	643	540	464
VTD: Thomastown	820	459	619	335
VTD: West Carthage	2,128	1,504	1,327	883
VTD: Wiggins	789	541	567	387
Leake MS County Subtotal	7,405	4,607	5,259	3,121
Madison MS County				
VTD: Bear Creek (<i>part</i>)	0	0	0	0
VTD: Bible Church	1,320	1,309	768	765
VTD: Camden	1,536	1,307	1,125	929
VTD: Cameron	162	96	133	75
VTD: Canton Precinct 1	2,807	2,097	2,044	1,437
VTD: Canton Precinct 2	2,656	1,514	1,981	1,047
VTD: Canton Precinct 3	483	285	348	182
VTD: Canton Precinct 4	2,863	2,557	1,984	1,742
VTD: Canton Precinct 5	2,194	2,146	1,438	1,408
VTD: Canton Precinct 7	475	441	383	354
VTD: Cedar Grove	296	38	239	27
VTD: Couparle	86	68	72	56
VTD: Liberty	2,259	1,510	1,762	1,171
VTD: Luther Branson School	1,302	1,090	928	754
VTD: Mad. Co. Bap. Fam. L.F.Ct	2,088	1,984	1,259	1,183
VTD: New Industrial Park	617	434	444	310

Plan: TRP_1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

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District 21 (continued)

Madison MS County (continued)

VTD: Raffitt Ferry	1,359	730	1,042	522
VTD: Sharon	1,098	940	826	684
Madison MS County Subtotal	23,601	18,546	16,776	12,646

Yazoo MS County

VTD: Deasonville	824	536	618	377
VTD: East Midway	530	418	385	292
VTD: Harttown	552	452	392	316
VTD: West Midway	274	61	230	42
Yazoo MS County Subtotal	2,180	1,467	1,625	1,027

District 21 Subtotal	54,562	37,809	39,192	25,876
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District 22

Bolivar MS County

VTD: Choctaw	381	307	300	235
VTD: Longshot	188	77	154	62
VTD: Northwest Cleveland	1,672	89	1,344	70
VTD: Skene	563	83	443	59
VTD: West Cleveland	3,692	527	3,038	465
Bolivar MS County Subtotal	6,496	1,083	5,279	891

Humphreys MS County

VTD: Gooden Lake	86	22	68	17
VTD: Isola	1,335	988	951	658
VTD: Lake City (28053302)	107	14	92	13
VTD: Louise	845	621	643	463
VTD: Midnight	303	161	228	116
VTD: Putnam	292	85	245	69
VTD: Silver City	748	482	525	336
VTD: Southeast Belzoni	848	819	499	476
VTD: Southwest Belzoni	665	647	447	436
Humphreys MS County Subtotal	5,229	3,839	3,698	2,584

Madison MS County

VTD: Bear Creek (part)	3,703	1,701	2,702	1,222
VTD: Flora	1,907	552	1,408	377
VTD: Gluckstadt (part)	3,378	502	2,521	341
VTD: Magnolia Heights	2,261	1,837	1,539	1,204
VTD: Smith School	555	24	457	18
VTD: Virililia	409	107	342	79
VTD: Yandell Road	2,469	333	1,719	205
Madison MS County Subtotal	14,682	5,056	10,688	3,446

Sharkey MS County	4,916	3,490	3,660	2,501
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Washington MS County

VTD: Arcola City Hall	1,160	646	865	478
VTD: Darlove Baptist Church	226	74	170	58
VTD: Glen Allan Health Clinic	851	438	650	307
VTD: Hollandale City Hall	2,991	2,500	2,158	1,735
VTD: Leland Health Dpt. Clinic	2,817	1,864	2,057	1,287
Washington MS County Subtotal	8,045	5,522	5,900	3,865

Plan: TRP_1	Administrator: Jason Knight/Ben Collins			
Type:	User:			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 22 (continued)				
Yazoo MS County				
VTD: 3-1 West	1,464	1,395	959	898
VTD: 3-2 East	1,493	1,209	1,078	839
VTD: 3-3 Jonestown	946	927	576	564
VTD: 3-4 South	1,029	449	712	303
VTD: Benton	965	235	731	171
VTD: Carter	71	32	57	23
VTD: Eden	559	121	419	88
VTD: Fairview	69	23	59	21
VTD: Free Run	289	61	235	44
VTD: Fugates	721	372	572	279
VTD: Holly Bluff	318	147	239	104
VTD: Lake City	309	91	228	64
VTD: Valley	152	19	115	13
VTD: Ward 4	6,998	4,327	5,929	3,386
VTD: Ward 5	3,385	3,190	2,234	2,063
VTD: Zion	702	194	515	133
Yazoo MS County Subtotal	19,470	12,792	14,658	8,993
District 22 Subtotal	58,838	31,782	43,883	22,280
District 23				
Issaquena MS County	1,406	906	1,125	702
Warren MS County	48,773	22,920	36,135	15,755
Yazoo MS County				
VTD: Center Ridge	866	63	655	46
VTD: District 4 Ward 2	84	0	66	0
VTD: Dover	631	97	460	77
VTD: East Bentonia	595	156	443	107
VTD: Mechanicsburg	680	58	528	53
VTD: Robinette	798	59	622	52
VTD: Sartartia	148	39	122	32
VTD: Tinsley	452	41	327	28
VTD: Ward 2	1,294	686	864	391
VTD: West Bentonia	867	555	618	383
Yazoo MS County Subtotal	6,415	1,754	4,705	1,169
District 23 Subtotal	56,594	25,580	41,965	17,626
District 24				
Grenada MS County				
VTD: Grenada Box 2	1,842	1,190	1,386	846
VTD: Grenada Box 3	2,704	1,992	1,995	1,447
VTD: Grenada Box 4	2,820	2,291	2,088	1,676
VTD: Grenada Box 5	2,926	755	2,258	532
VTD: Holcomb	1,479	355	1,094	258
VTD: Sweethome	631	208	485	160
Grenada MS County Subtotal	12,402	6,791	9,306	4,919
Holmes MS County				
VTD: Acona	992	913	680	619
VTD: Cruger	455	375	336	270
VTD: Lexington Beat 1	2,368	2,139	1,595	1,405

Plan: TRP 1	Administrator: Jason Knight/Ben Collins			
Type:	User:			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 24 (continued)				
Holmes MS County (continued)				
VTD: Lexington Beat 4	2,614	2,291	1,879	1,599
VTD: Lexington Beat 5	585	271	449	181
VTD: Lexington East	612	537	453	389
VTD: Sandhill	91	16	69	10
VTD: Tehula	2,503	2,326	1,686	1,533
VTD: Thornton	716	644	510	443
Holmes MS County Subtotal	10,936	9,512	7,657	6,449
Humphreys MS County				
VTD: Central Belzoni	2,046	1,385	1,500	952
VTD: Four Mile	152	42	115	28
VTD: North Belzoni	1,424	1,209	998	826
VTD: Northwest Belzoni	524	512	362	352
Humphreys MS County Subtotal	4,146	3,148	2,975	2,158
Leflore MS County				
VTD: Central Greenwood	937	684	701	497
VTD: East Greenwood	2,909	2,835	1,970	1,902
VTD: Minter City	560	314	439	232
VTD: Morgan City/Swiftown	498	324	363	218
VTD: MVSU	1,316	1,112	1,192	1,040
VTD: North Greenwood <i>(part)</i>	1,209	690	912	468
VTD: North Ita Bena	3,006	2,583	2,132	1,771
VTD: Northeast Greenwood	2,780	1,997	1,956	1,286
VTD: Rising Sun	1,073	1,058	713	699
VTD: Schlater	580	330	414	231
VTD: Sidon	776	625	525	390
VTD: South Greenwood	1,645	1,616	1,126	1,107
VTD: South Ita Bena	977	851	645	542
VTD: Southeast Greenwood	4,502	3,638	3,422	2,655
VTD: Southwest Greenwood	2,215	1,956	1,377	1,208
VTD: West Greenwood	2,560	2,241	1,913	1,655
Leflore MS County Subtotal	27,543	22,854	19,800	15,901
Tallahatchie MS County				
VTD: Blue Cane	99	80	70	52
VTD: Glendora	938	823	652	560
VTD: Philipp	337	185	273	144
VTD: Tippo	484	344	348	231
VTD: Webb Beat 4	320	261	227	177
Tallahatchie MS County Subtotal	2,178	1,693	1,570	1,164
District 24 Subtotal	57,205	43,998	41,308	30,591
District 25				
Hinds MS County				
VTD: 32	1,238	162	993	78
VTD: 33	1,176	3	901	2
VTD: 34	2,242	51	1,715	34
VTD: 35	2,144	120	1,617	84
VTD: 36	1,671	1,018	1,269	712
VTD: 44	3,992	2,476	2,907	1,648

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 25 (continued)				
Hinds MS County (continued)				
VTD: 45	2,553	254	2,060	194
VTD: 78	4,029	1,542	3,333	1,158
Hinds MS County Subtotal	19,045	5,626	14,795	3,910
Madison MS County				
VTD: Bear Creek <i>(part)</i>	0	0	0	0
VTD: Cobblestone	2,692	371	2,069	256
VTD: Gluckstadt <i>(part)</i>	7,015	1,053	4,642	700
VTD: Highland Colony Bap. Ch.	3,851	683	2,798	501
VTD: Madison 1	2,818	261	1,964	157
VTD: Madison 2	3,466	170	2,474	128
VTD: Madison 3	4,683	615	3,269	398
VTD: Main Harbor	1,709	62	1,455	46
VTD: NorthBay	1,244	116	932	81
VTD: Ridgeland Tennis Center	5,659	1,347	4,377	931
VTD: SunnyBrook	757	75	540	54
VTD: Trace Harbor	2,146	116	1,600	71
VTD: Victory Baptist Church	1,724	103	1,244	71
VTD: Whispering Lake	2,394	269	1,716	177
Madison MS County Subtotal	40,158	5,241	29,080	3,571
District 25 Subtotal	59,203	10,867	43,875	7,481
District 26				
Hinds MS County				
VTD: 41	2,537	2,503	1,872	1,842
VTD: 43	3,838	3,465	2,551	2,252
VTD: 46	2,247	1,224	1,746	841
VTD: 79	3,557	2,479	2,572	1,664
VTD: 80	4,130	3,957	2,796	2,664
VTD: 81	1,902	1,817	1,584	1,505
VTD: 82	1,839	1,782	1,398	1,346
VTD: 83	3,738	3,697	2,650	2,616
VTD: 84	296	275	237	224
VTD: 85	3,222	3,175	2,390	2,354
VTD: Bolton	1,650	1,152	1,272	854
VTD: Brownsville	783	405	597	313
VTD: Cynthia	1,104	752	817	560
VTD: Edwards	3,406	2,554	2,522	1,824
VTD: Pinchaven <i>(part)</i>	3,324	1,337	2,439	948
VTD: Pocahontas	648	409	534	334
VTD: Timmin	1,221	264	897	189
Hinds MS County Subtotal	39,442	31,247	28,874	22,330
Madison MS County				
VTD: Lorman-Cavalier	1,692	673	1,346	499
VTD: Ridgeland 1	3,528	1,265	2,709	844
VTD: Ridgeland 3	4,333	2,640	3,210	1,880
VTD: Ridgeland 4	2,968	1,417	2,392	1,057
VTD: Ridgeland First Meth. Ch.	3,570	889	2,697	661
VTD: Tougaloo	671	641	657	631
Madison MS County Subtotal	16,762	7,525	13,011	5,572

Plan: TRP_1

Administrator:

Type:

User:

Jason Knight/Ben Collins

	POPULATION	Black	[18+ Pop]	[18+ Blk]
District 26 Subtotal	56,204	38,772	41,885	27,902
District 27				
Hinds MS County				
VTD: 11	659	644	508	498
VTD: 12	798	782	591	580
VTD: 13	1,044	1,017	807	790
VTD: 16	1,744	1,273	1,338	917
VTD: 21	811	777	587	557
VTD: 22	2,096	2,065	1,491	1,463
VTD: 23	2,125	2,098	1,417	1,399
VTD: 24	1,236	1,162	829	774
VTD: 26 (part)	0	0	0	0
VTD: 27	1,713	1,686	1,368	1,349
VTD: 28	1,861	1,836	1,535	1,514
VTD: 29	976	948	764	741
VTD: 30	1,003	993	745	735
VTD: 31	1,474	1,440	1,140	1,112
VTD: 38	1,476	1,238	1,013	808
VTD: 39	1,628	1,596	1,163	1,137
VTD: 40	2,103	2,026	1,620	1,559
VTD: 42	2,849	2,598	2,065	1,859
VTD: 54	1,280	1,212	969	905
VTD: 55	1,388	1,349	979	946
VTD: 56 (part)	589	559	444	422
VTD: 57	1,154	1,128	828	809
VTD: 60	816	684	599	473
VTD: 61	1,634	1,573	1,137	1,096
VTD: 62	2,518	2,381	1,686	1,576
VTD: 86	2,343	2,247	1,607	1,540
VTD: Clinton 1	2,873	887	2,208	589
VTD: Clinton 2	6,645	1,770	4,888	1,172
VTD: Clinton 3	3,915	1,378	3,128	1,021
VTD: Clinton 4	2,090	793	1,514	519
VTD: Clinton 5	1,441	273	1,089	189
VTD: Pinchaven (part)	167	63	134	42
Hinds MS County Subtotal	54,449	40,476	40,191	29,091
District 27 Subtotal	54,449	40,476	40,191	29,091
District 28				
Hinds MS County				
VTD: 18	927	898	697	677
VTD: 19	1,023	1,004	730	714
VTD: 20	1,047	1,027	798	784
VTD: 25	2,128	2,060	1,478	1,428
VTD: 26 (part)	1,077	983	774	690
VTD: 50	752	674	571	498
VTD: 51	614	601	465	452
VTD: 52	1,724	1,657	1,243	1,190
VTD: 53	309	305	235	231
VTD: 56 (part)	0	0	0	0
VTD: 58	1,671	1,635	1,322	1,287
VTD: 59	2,300	2,252	1,531	1,486

Plan: TRP_1
Type:

Administrator:
User: Jason Knight/Ben Collins
POPULATION Black [18+ Pop] [18+ Blk]

District 28 (continued)

Hinds MS County (continued)

VTD: 63	1,189	1,130	1,006	952
VTD: 64	802	782	626	610
VTD: 66	158	154	109	106
VTD: 67	1,585	1,481	1,014	928
VTD: 68	4,140	3,745	2,774	2,411
VTD: 69	2,007	1,821	1,276	1,116
VTD: 70	1,684	1,494	894	758
VTD: 71	2,144	1,808	1,360	1,068
VTD: 73	2,166	1,868	1,385	1,143
VTD: 74	1,716	1,459	1,060	842
VTD: 75	1,389	1,187	882	717
VTD: 76	1,468	1,176	933	687
VTD: 87	2,391	2,035	1,525	1,237
VTD: 88	2,501	2,213	1,835	1,580
VTD: 89	2,035	1,779	1,412	1,189
VTD: 90	3,254	2,766	2,025	1,620
VTD: 92	4,132	3,628	2,651	2,203
VTD: 93	2,800	2,353	1,875	1,496
VTD: Clinton 6	4,137	1,896	3,127	1,302
VTD: Jackson State	2,210	2,138	2,181	2,109
Hinds MS County Subtotal	57,480	50,009	39,794	33,511
District 28 Subtotal	57,480	50,009	39,794	33,511

District 29

Hinds MS County

VTD: 1	345	172	328	159
VTD: 10	679	670	492	489
VTD: 14	1,348	101	1,136	80
VTD: 15	442	26	387	26
VTD: 17	843	65	662	43
VTD: 2	461	439	389	371
VTD: 37	1,644	879	1,253	621
VTD: 4	861	856	643	639
VTD: 47	1,781	1,441	1,401	1,106
VTD: 5	1,926	1,009	1,742	883
VTD: 6	1,916	1,106	1,594	844
VTD: 72	2,354	2,101	1,398	1,184
VTD: 77	2,897	2,182	1,891	1,307
VTD: 8	1,303	139	1,181	128
VTD: 9	1,961	84	1,696	78
VTD: 91	2,927	2,686	2,086	1,879
VTD: 94	3,832	3,484	2,687	2,377
VTD: 95	877	556	646	364
VTD: 96	2,613	1,992	1,892	1,330
VTD: 97	1,210	870	825	532
VTD: Byram 1	8,418	5,211	5,886	3,433
VTD: Byram 2 (part)	2,697	1,006	2,031	667
VTD: Old Byram	3,959	1,500	2,936	989
VTD: Spring Ridge	4,616	2,664	3,442	1,838
VTD: Terry	6,599	2,661	5,045	1,953

Plan: TRP 1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+_Pop]

[18+_Blk]

District 29 (continued)**Hinds MS County Subtotal**

58,509

33,900

43,669

23,320

District 29 Subtotal

58,509

33,900

43,669

23,320

District 30

Rankin MS County

VTD: Crest Park

2,883

430

2,081

225

VTD: Cunningham Heights

1,883

339

1,388

240

VTD: East Brandon

3,163

333

2,310

222

VTD: Eldorado

2,637

721

2,031

503

VTD: Liberty

2,307

318

1,923

251

VTD: Monterey *(part)*

234

67

179

45

VTD: North Brandon

5,882

554

4,195

403

VTD: North McLaurin

1,779

196

1,350

130

VTD: North Pearson

540

44

409

35

VTD: North Richland

2,441

332

1,879

257

VTD: Park Place

4,317

1,051

3,319

847

VTD: Patton Place

1,661

198

1,250

128

VTD: Pearl

1,780

410

1,334

278

VTD: South Brandon

2,114

82

1,582

50

VTD: South McLaurin

2,456

237

1,789

148

VTD: South Pearson

4,558

2,559

4,216

2,380

VTD: South Richland *(part)*

959

22

695

15

VTD: Springhill

3,728

1,635

2,773

1,150

VTD: West Brandon

7,002

2,368

4,780

1,528

VTD: West Pearl

3,581

1,274

2,690

837

Rankin MS County Subtotal

55,905

13,170

42,173

9,672

District 30 Subtotal

55,905

13,170

42,173

9,672

District 31

Lauderdale MS County

VTD: Center Hill

2,114

183

1,559

115

VTD: Collinsville

2,515

318

1,845

233

VTD: Martin

1,396

23

1,007

17

VTD: Obadiah

267

7

194

6

VTD: West Lauderdale

371

38

263

22

Lauderdale MS County Subtotal

6,663

569

4,868

393

Newton MS County

21,720

6,567

16,067

4,663

Scott MS County

28,264

10,585

20,630

7,289

District 31 Subtotal

56,647

17,721

41,565

12,345

District 32

Kemper MS County

10,456

6,288

8,015

4,604

Lauderdale MS County

VTD: 10

984

798

654

505

VTD: 11

1,292

1,090

1,000

827

VTD: 12

2,329

2,124

1,671

1,503

VTD: 14

1,717

1,402

1,332

1,034

VTD: 15

405

342

263

209

VTD: 20

986

856

771

650

VTD: 3

4,412

3,049

3,168

1,997

VTD: 4

1,512

1,245

1,084

881

Plan: TRP J	Administrator: Jason Knight/Ben Collins			
Type:	User:			
	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 32 (continued)				
Lauderdale MS County (continued)				
VTD: 5	4,341	1,946	3,149	1,256
VTD: 6	4,618	4,041	3,171	2,726
VTD: 7	1,482	1,015	1,114	701
VTD: 8	2,206	1,400	1,738	1,020
VTD: 9	3,462	2,906	2,209	1,752
VTD: Center Ridge	433	332	308	227
VTD: Daleville	528	353	400	276
VTD: East Lauderdale	1,983	601	1,519	415
VTD: East Marion	512	148	391	100
VTD: Marion	1,199	624	848	423
VTD: West Dalewood	292	39	235	26
Lauderdale MS County Subtotal	34,693	24,311	25,025	16,528
Noxubee MS County				
VTD: Earl Nash Gym	1,981	1,497	1,446	1,050
VTD: Mashulaville	626	369	469	268
VTD: Savannah	302	143	230	116
VTD: Shuqualak	1,204	919	895	664
VTD: Somerville	263	49	215	45
Noxubee MS County Subtotal	4,376	2,977	3,255	2,143
Winston MS County				
VTD: American Legion	1,589	1,369	1,133	957
VTD: County Agent	2,151	1,800	1,460	1,187
VTD: Fairground	3,741	1,434	2,884	1,008
VTD: Lovorn Tractor (part)	188	155	127	96
VTD: Mill Creek	2,036	687	1,593	498
VTD: Wathall (part)	150	116	111	77
Winston MS County Subtotal	9,855	5,561	7,308	3,823
District 32 Subtotal	59,380	39,137	43,603	27,098
District 33				
Clarke MS County	16,732	5,759	12,604	4,006
Lauderdale MS County				
VTD: 1	3,547	727	2,726	491
VTD: 13	3,595	1,391	2,763	881
VTD: 16	532	116	428	84
VTD: 17	111	23	92	15
VTD: 18	349	151	279	100
VTD: 2	551	149	437	102
VTD: Alamucha	422	145	311	108
VTD: Andrews Chapel	1,510	348	1,134	242
VTD: Bailey	2,052	498	1,602	385
VTD: Causeyville	903	45	715	33
VTD: Clarkdale	1,241	68	937	55
VTD: Culpepper	829	23	607	18
VTD: East Bonita	957	295	783	230
VTD: Kewanee	533	264	396	192
VTD: Meehan	2,305	1,030	2,059	984
VTD: Mt. Gilead	1,087	272	811	192

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 33 (continued)				
Lauderdale MS County (continued)				
VTD: New Lauderdale	3,530	567	2,724	438
VTD: Odom	941	377	707	273
VTD: Pickard	862	178	660	113
VTD: Prospect	1,028	170	871	112
VTD: Russell	1,419	559	1,068	386
VTD: Sageville	248	108	202	92
VTD: South Nellieburg	1,077	150	901	132
VTD: South Russell	302	62	224	45
VTD: Suqualena	2,547	375	1,977	279
VTD: Toomsaba	950	427	732	322
VTD: Valley	408	52	313	33
VTD: Vinville	2,291	544	1,729	374
VTD: Whynot	934	183	709	120
VTD: Zero	1,844	153	1,391	108
Lauderdale MS County Subtotal	38,905	9,450	30,288	6,939
District 33 Subtotal	55,637	15,209	42,892	10,945
District 34				
Forrest MS County				
VTD: Davis School	2,454	1,841	1,792	1,310
VTD: Eaton School	1,136	835	829	600
VTD: Eatonville	1,349	239	1,095	177
VTD: Glendale	2,215	1,233	1,662	880
VTD: Jones School	1,037	972	802	755
VTD: Lillie Burney School	1,219	1,167	731	697
VTD: North Heights	2,380	1,642	1,873	1,222
VTD: Rowan School	1,693	1,615	1,143	1,084
VTD: Salvation Army	3,367	2,773	2,290	1,762
VTD: Walthall School	1,749	993	1,331	753
VTD: Westside (part)	1,220	1,120	695	627
Forrest MS County Subtotal	19,819	14,430	14,243	9,867
Jasper MS County	17,062	8,970	12,939	6,439
Jones MS County				
VTD: Blackwell	131	9	99	7
VTD: Bruce	755	24	579	19
VTD: Centerville	390	7	293	4
VTD: Cooks Ave. Comm. Ctr.	1,048	1,005	737	704
VTD: Gitano	423	136	330	101
VTD: Hebron	1,069	674	775	474
VTD: Kingston Church	842	739	524	440
VTD: Lamar School	1,873	810	1,359	519
VTD: Laurel Courthouse	1,791	836	1,301	544
VTD: Mauldin Comm. Center (part)	558	5	418	3
VTD: National Guard Armory	2,212	1,736	1,588	1,162
VTD: Nora Davis School (part)	1,639	1,526	1,227	1,124
VTD: North Laurel (part)	0	0	0	0
VTD: Oak Park School	1,604	1,584	1,003	990
VTD: Old Health Dept.	629	559	411	373
VTD: Pendorf (part)	0	0	0	0

Plan: TRP J	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 34 (continued)				
Jones MS County (continued)				
VTD: Rainey	1,855	16	1,380	14
VTD: Sandhill	1,357	14	1,048	7
VTD: Shelton	1,215	227	937	170
VTD: Soso	1,738	790	1,282	554
VTD: Stainton <i>(part)</i>	1,687	844	1,241	560
Jones MS County Subtotal	22,816	11,541	16,532	7,769
District 34 Subtotal	59,697	34,941	43,714	24,075
District 35				
Copiah MS County				
VTD: Crystal Springs East <i>(part)</i>	2,450	642	1,967	487
Copiah MS County Subtotal	2,450	642	1,967	487
Rankin MS County				
VTD: Antioch	436	12	319	4
VTD: Cato	1,776	385	1,342	277
VTD: Clear Branch	1,466	214	1,084	160
VTD: Cleary	2,577	103	1,944	76
VTD: Dry Creek	1,688	666	1,177	402
VTD: East Steens Creek	4,327	764	3,136	530
VTD: Johns	911	199	693	146
VTD: Mayton	357	113	264	79
VTD: Monterey <i>(part)</i>	3,070	854	2,244	644
VTD: Mountain Creek	785	102	590	82
VTD: Puckett	954	164	702	107
VTD: Shiloh	454	114	339	97
VTD: South Richland <i>(part)</i>	4,622	819	3,218	475
VTD: Star	1,546	328	1,171	237
VTD: West Steens Creek	3,649	447	2,705	353
Rankin MS County Subtotal	28,618	5,284	20,928	3,669
Simpson MS County	27,503	9,666	20,252	6,624
District 35 Subtotal	58,571	15,592	43,147	10,780
District 36				
Claiborne MS County	9,604	8,104	7,335	6,042
Copiah MS County				
VTD: Beauregard	1,627	312	1,171	218
VTD: Carpenter	545	422	433	328
VTD: Centerpoint	1,657	593	1,278	457
VTD: Crystal Springs East <i>(part)</i>	1,528	812	1,099	519
VTD: Crystal Springs North	945	666	713	471
VTD: Crystal Springs South	3,364	2,353	2,510	1,692
VTD: Crystal Springs West	1,674	746	1,287	539
VTD: Dentville	309	72	252	49
VTD: Gallman	3,256	1,611	2,431	1,104
VTD: Georgetown North	469	283	358	205
VTD: Hazlehurst East	2,337	2,050	1,628	1,416
VTD: Hazlehurst North	673	442	480	277
VTD: Hazlehurst South	754	468	571	341
VTD: Hazlehurst West	2,955	2,212	2,191	1,560

Plan: TRP 1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 36 (continued)				
Copiah MS County (continued)				
VTD: Martinsville	816	495	576	335
Copiah MS County Subtotal	22,909	13,537	16,978	9,511
Hinds MS County				
VTD: Byram 2 <i>(part)</i>	426	57	328	45
VTD: Cayuga	494	312	375	232
VTD: Chapel Hill	1,384	620	1,068	452
VTD: Dry Grove	1,271	407	1,011	318
VTD: Learned	999	425	750	304
VTD: Raymond 1	3,305	1,553	2,448	1,054
VTD: Raymond 2	5,417	2,655	4,619	2,332
VTD: St. Thomas	461	435	347	326
VTD: Utica 1	1,294	613	1,003	446
VTD: Utica 2	1,309	1,035	970	748
Hinds MS County Subtotal	16,360	8,112	12,919	6,257
Jefferson MS County	7,726	6,620	5,901	4,940
District 36 Subtotal	56,599	36,373	43,133	26,750
District 37				
Adams MS County				
VTD: Airport	1,252	868	977	666
VTD: Beau Pre	1,557	645	1,149	459
VTD: Bellemont	3,229	982	2,670	753
VTD: Carpenter	1,040	682	830	524
VTD: Concord	1,261	1,171	916	850
VTD: Convention Center	897	518	660	362
VTD: Courthouse	1,120	173	989	151
VTD: Duncan Park	2,007	830	1,555	555
VTD: Kingston	1,213	167	983	118
VTD: Liberty Park	1,537	277	1,172	177
VTD: Maryland	1,623	1,461	1,062	939
VTD: Morgantown	969	678	714	456
VTD: Oakland	2,282	1,108	1,707	708
VTD: Palestine	1,979	953	1,486	725
VTD: Washington	3,084	481	2,851	391
Adams MS County Subtotal	25,050	10,994	19,721	7,834
Amite MS County				
VTD: Crosby	334	198	251	140
VTD: East Fork	882	332	704	261
VTD: East Gloster	633	201	493	132
VTD: East Liberty	396	141	332	116
VTD: Homochitto	174	29	145	26
VTD: Liberty	826	260	650	184
VTD: New Zion	636	114	487	88
VTD: Oneil	314	7	264	6
VTD: Smithdale	801	243	621	173
VTD: South Liberty	967	293	739	215
VTD: Tangipahoa	614	120	482	88
VTD: Zion Hill	517	39	418	32

Plan: TRP_1
Type:

Administrator:
User:

Jason Knight/Ben Collins

	POPULATION	Black	[18+ _Pop]	[18+ _Blk]
District 37 (continued)				
Amite MS County Subtotal	7,094	1,977	5,586	1,461
Franklin MS County	8,118	2,791	6,075	1,948
Pike MS County				
VTD: 13	1,343	675	994	495
VTD: 14	1,483	307	1,066	216
VTD: 15	1,239	245	867	148
VTD: 20	1,709	550	1,344	445
VTD: 21	1,675	151	1,182	106
VTD: 22	848	160	699	118
VTD: 23	1,039	226	795	164
VTD: 25	1,024	248	890	186
VTD: 26	814	223	620	145
VTD: 27	513	184	394	130
VTD: 3	2,261	902	1,517	585
VTD: 4	1,054	300	745	211
Pike MS County Subtotal	15,002	4,171	11,113	2,949
District 37 Subtotal	55,264	19,933	42,495	14,192
District 38				
Adams MS County				
VTD: By-Pass Firestation	1,889	1,371	1,359	939
VTD: Foster Mound	1,626	1,522	1,231	1,142
VTD: Northside School	1,411	1,391	1,058	1,041
VTD: Pine Ridge	1,175	947	873	693
VTD: Thompson	1,146	1,062	860	797
Adams MS County Subtotal	7,247	6,293	5,381	4,612
Amite MS County				
VTD: Amite River	626	486	495	381
VTD: Ariel	404	265	297	199
VTD: Berwick	525	398	380	293
VTD: East Centreville	724	296	533	210
VTD: Gloster	1,323	1,011	1,005	751
VTD: Riceville	765	388	542	277
VTD: Street	539	116	413	87
VTD: Tickfaw	231	126	190	98
VTD: Walls	900	364	735	289
Amite MS County Subtotal	6,037	3,450	4,590	2,585
Pike MS County				
VTD: 1	1,732	947	1,235	646
VTD: 10	2,029	1,405	1,490	977
VTD: 11	1,147	555	882	398
VTD: 12	591	487	419	334
VTD: 16	1,734	1,651	1,185	1,135
VTD: 17	947	472	749	340
VTD: 18	613	435	437	293
VTD: 19	1,332	702	1,049	544
VTD: 2	1,656	1,141	1,217	801
VTD: 24	1,745	1,729	1,024	1,013
VTD: 28	1,427	663	1,074	460

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 38 (continued)				
Pike MS County (continued)				
VTD: 29	1,197	374	931	279
VTD: 30	970	400	724	273
VTD: 31	854	303	657	207
VTD: 32	1,048	426	816	325
VTD: 5	1,359	1,091	963	718
VTD: 6	1,298	976	838	586
VTD: 7	907	854	585	550
VTD: 8	1,483	1,143	1,029	774
VTD: 9	1,333	888	1,016	649
Pike MS County Subtotal	25,402	16,642	18,320	11,302
Walthall MS County				
VTD: Dexter	1,354	426	1,013	300
VTD: Dinan	1,763	1,401	1,230	939
VTD: Dist.3 Tylertown	573	109	476	80
VTD: Improve	820	215	638	160
VTD: Lexie	1,268	239	984	154
VTD: Mesa	106	7	85	5
VTD: Midway	476	95	360	66
VTD: North Kirklin	997	567	731	396
VTD: North Knoxo	1,677	1,457	1,163	992
VTD: Saint Paul	389	273	281	191
VTD: South Kirklin	426	151	289	90
VTD: South Knoxo	199	73	154	58
VTD: West Tylertown	860	514	617	338
Walthall MS County Subtotal	10,908	5,527	8,021	3,769
Wilkinson MS County	9,878	6,992	7,607	5,200
District 38 Subtotal	59,472	38,904	43,919	27,468
District 39				
Copiah MS County				
VTD: Georgetown South	801	289	614	202
VTD: Shady Grove	798	139	584	95
VTD: Strong Hope-Union	766	44	590	27
VTD: Wesson	1,725	332	1,332	278
Copiah MS County Subtotal	4,090	804	3,120	602
Lawrence MS County	12,929	3,974	9,663	2,777
Lincoln MS County	34,869	10,443	25,766	7,398
Walthall MS County				
VTD: Darbun	261	82	194	51
VTD: Dist.4 Tylertown	907	140	709	99
VTD: Dist.4 West	701	121	539	92
VTD: East Tylertown	131	3	107	3
VTD: Enon	590	105	415	67
VTD: Hope	528	459	375	323
VTD: Sartinville	435	189	315	122
VTD: Varnell	982	247	693	175
Walthall MS County Subtotal	4,535	1,346	3,347	932
District 39 Subtotal	56,423	16,567	41,896	11,709

Plan: TRP 1	Administrator: Jason Knight/Ben Collins			
Type:	User:			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 40				
Marion MS County	27,088	8,752	20,156	6,168
Pearl River MS County				
VTD: Anchor Lake/West Union	1,506	23	1,142	16
VTD: Buck Branch	1,318	13	1,007	8
VTD: Carriere	2,299	175	1,645	120
VTD: Ford's Creek	308	16	252	14
VTD: Henleyfield	1,599	37	1,257	27
VTD: Hide-A-Way North Hills	2,729	113	2,168	92
VTD: McNeill 3	1,590	59	1,139	38
VTD: McNeill 5	955	25	692	19
VTD: Mill Creek	1,620	35	1,171	25
VTD: Nicholson	2,752	273	2,044	164
VTD: Ozona	1,880	60	1,375	44
VTD: Picayune 1 East	1,980	788	1,532	610
VTD: Picayune 2	2,696	263	2,029	167
VTD: Picayune 4 West	1,183	57	919	36
VTD: Picayune 5	2,685	293	2,075	193
VTD: Pine Grove	2,784	104	2,125	76
VTD: Sycamore	1,948	36	1,477	25
Pearl River MS County Subtotal	31,832	2,370	24,049	1,674
District 40 Subtotal	58,920	11,122	44,205	7,842
District 41				
Covington MS County	19,568	6,825	14,481	4,646
Forrest MS County				
VTD: Rawls Springs	2,080	853	1,542	563
Forrest MS County Subtotal	2,080	853	1,542	563
Jefferson Davis MS County	12,487	7,477	9,539	5,367
Lamar MS County				
VTD: Rocky Branch	1,038	204	764	152
VTD: Sumrall	4,129	331	3,000	231
Lamar MS County Subtotal	5,167	535	3,764	383
Smith MS County	16,491	3,776	12,230	2,582
District 41 Subtotal	55,793	19,466	41,556	13,541
District 42				
Forrest MS County				
VTD: Barrontown-Macedonia	4,427	337	3,239	242
VTD: Leeville	2,050	132	1,470	91
VTD: Petal Masonic Lodge	2,536	159	1,889	94
VTD: West Petal	1,692	350	1,251	227
Forrest MS County Subtotal	10,705	978	7,849	654
Jones MS County				
VTD: Antioch	775	1	582	1
VTD: Calhoun	2,912	26	2,251	24
VTD: Cameron Center	1,258	460	912	289
VTD: County Barn	1,711	385	1,400	320
VTD: Currie	283	269	219	208
VTD: Ellisville Court House	1,508	428	1,252	359

Plan: TRP_1
Type:

Administrator:
User: Jason Knight/Ben Collins
POPULATION Black [18+ Pop] [18+ Blk]

District 42 (continued)

Jones MS County (continued)				
VTD: Erata	689	320	524	247
VTD: Glade School	1,852	145	1,440	96
VTD: Johnson	1,093	13	811	5
VTD: Landrum Comm. Ctr.	702	3	537	3
VTD: Matthews	943	109	710	73
VTD: Mauldin Comm. Center (part)	1,408	333	1,063	253
VTD: Moselle	2,018	266	1,481	200
VTD: Myrick	1,977	24	1,477	14
VTD: Nora Davis School (part)	0	0	0	0
VTD: North Laurel (part)	3,429	1,187	2,566	716
VTD: Ovelt	1,522	32	1,135	22
VTD: Pendorf (part)	1,113	108	762	62
VTD: Pinegrove	1,426	114	1,132	104
VTD: Pleasant Ridge	1,170	18	890	12
VTD: Powers Comm. Ctr.	1,715	368	1,288	263
VTD: Roosevelt	860	593	618	401
VTD: Rustin	1,026	4	769	4
VTD: Sandersville Civic Center	1,557	149	1,166	110
VTD: Shady Grove	5,588	1,658	4,037	1,012
VTD: Sharon	2,133	248	1,661	185
VTD: South Jones	1,226	316	956	215
VTD: Stainton (part)	10	0	7	0
VTD: Tuckers	1,575	13	1,162	8
VTD: Union	1,466	22	1,073	17
Jones MS County Subtotal	44,945	7,612	33,881	5,223
District 42 Subtotal	55,650	8,590	41,730	5,877

District 43

George MS County	22,578	1,829	16,518	1,320
Greene MS County	14,400	3,749	11,244	3,191
Wayne MS County	20,747	8,071	15,313	5,487
District 43 Subtotal	57,725	13,649	43,075	9,998

District 44

Lamar MS County				
VTD: Arnold Line	3,022	1,009	2,064	563
VTD: Baxterville	838	5	604	2
VTD: Bellevue	1,866	27	1,429	19
VTD: Breland	5,934	1,669	4,275	1,119
VTD: Greenville	1,517	4	1,118	3
VTD: Lake Serene	3,966	264	2,803	165
VTD: Lamar Park	3,306	1,137	2,613	818
VTD: Lumberton	3,005	1,312	2,171	881
VTD: Midway	2,681	208	1,895	117
VTD: N E Lamar	3,584	1,296	2,862	880
VTD: Oak Grove	3,368	328	2,394	203
VTD: Okahola	1,178	283	816	170
VTD: Oloh	1,221	43	901	28
VTD: Pine Grove	1,055	17	756	7

Plan: TRP 1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+_Pop]

[18+_Blk]

District 44 (continued)

Lamar MS County (continued)

VTD: Purvis	3,881	615	2,934	438
VTD: Richburg	3,384	488	2,431	328
VTD: South Purvis	3,013	72	2,267	43
VTD: Wesley Manor	3,094	1,556	2,511	1,135
VTD: Yawn	578	15	442	10

Lamar MS County Subtotal

	50,491	10,348	37,286	6,929
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Pearl River MS County

VTD: Byrd Line	382	5	311	2
VTD: Gum Pond	1,689	22	1,282	15
VTD: Hickory Grove	336	19	270	15
VTD: Oak Hill	1,230	21	933	19
VTD: Poplarville 3 (part)	259	4	191	3

Pearl River MS County Subtotal

	3,896	71	2,987	54
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District 44 Subtotal

	54,387	10,419	40,273	6,983
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District 45

Forrest MS County

VTD: Blair High School	3,724	1,929	3,104	1,460
VTD: Brooklyn	1,140	30	845	25
VTD: Camp School	948	362	796	277
VTD: Carnes	1,535	16	1,122	13
VTD: Dantzler	993	13	737	10
VTD: Dixie	3,803	324	2,851	213
VTD: Dixie Pine-Central	2,638	1,781	1,932	1,289
VTD: East Petal	3,415	297	2,482	177
VTD: Highland Park	3,375	1,577	2,852	1,185
VTD: Maxie	369	67	295	58
VTD: McKaurin	804	64	623	53
VTD: Pinecrest	4,462	1,509	4,015	1,287
VTD: Sunrise	5,363	646	3,886	455
VTD: Thames School	3,214	404	2,599	268
VTD: Timberton	607	78	461	59
VTD: USM Golf Course	1,075	337	961	305
VTD: Westside (part)	2,046	744	1,689	490
VTD: Woodley School	2,819	643	2,347	444

Forrest MS County Subtotal

	42,330	10,821	33,597	8,068
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Perry MS County

	12,250	2,451	9,136	1,711
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District 45 Subtotal

	54,580	13,272	42,733	9,779
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District 46

Hancock MS County

	43,929	3,138	33,431	2,214
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Harrison MS County

VTD: 201	3,242	73	2,325	38
VTD: 212	497	5	375	4
VTD: 301	2,174	557	1,635	422
VTD: 304	1,992	335	1,566	247
VTD: 305	2,544	136	1,900	106
VTD: 306	1,734	33	1,275	20
VTD: 315	1,627	46	1,151	28

Plan: TRP_1	Administrator:			
Type:	User: Jason Knight/Ben Collins			
	POPULATION	Black	[18+_Pop]	[18+_Blk]
District 46 (continued)				
Harrison MS County Subtotal	13,810	1,185	10,227	865
District 46 Subtotal	57,739	4,323	43,658	3,079
District 47				
Jackson MS County				
VTD: Gulf Hills	7,822	1,101	5,774	703
VTD: Larue	493	10	357	5
VTD: Latimer	6,965	265	5,068	164
VTD: St. Martin	5,587	690	4,265	501
Jackson MS County Subtotal	20,867	2,066	15,464	1,373
Pearl River MS County				
VTD: Caesar	980	4	706	2
VTD: Derby	1,462	173	1,178	145
VTD: Picayune 1 South	3,400	2,396	2,470	1,668
VTD: Picayune 4 East	2,055	344	1,460	192
VTD: Poplarville 1	1,508	577	1,047	346
VTD: Poplarville 2	1,809	302	1,518	283
VTD: Poplarville 3 <i>(part)</i>	1,359	72	1,035	53
VTD: Progress	609	1	484	1
VTD: Salem	3,687	102	2,703	71
VTD: Savannah	1,064	20	815	17
VTD: Steep Hollow	1,090	17	816	9
VTD: Whitesand 1	724	421	547	313
VTD: Whitesand 2	359	2	287	2
Pearl River MS County Subtotal	20,106	4,431	15,066	3,102
Stone MS County	17,786	3,404	13,455	2,446
District 47 Subtotal	58,759	9,901	43,985	6,921
District 48				
Harrison MS County				
VTD: 206	1,887	371	1,523	233
VTD: 302	2,791	955	2,140	651
VTD: 303	1,860	338	1,504	241
VTD: 307	1,908	149	1,479	106
VTD: 308	2,130	150	1,641	100
VTD: 309	2,311	214	1,678	121
VTD: 310	2,709	310	2,065	241
VTD: 311	3,587	258	2,650	149
VTD: 312	2,147	143	1,623	93
VTD: 313	1,453	121	1,087	84
VTD: 314	3,332	113	2,577	80
VTD: 401 <i>(part)</i>	1,250	870	890	594
VTD: 402	2,368	1,246	1,759	853
VTD: 403	568	218	480	175
VTD: 404	5,166	2,777	3,462	1,733
VTD: 405	3,531	2,685	2,495	1,826
VTD: 407	2,101	1,783	1,436	1,206
VTD: 408	1,509	860	1,150	613
VTD: 409	7,993	3,443	5,574	2,212
VTD: 410	5,423	1,988	4,286	1,471
VTD: 411	2,058	1,924	1,558	1,467

Plan: TRP_1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+_Pop]

[18+_Blk]

District 48 (continued)

Harrison MS County (continued)

VTD: 412	879	585	664	442
Harrison MS County Subtotal	58,961	21,501	43,721	14,721
District 48 Subtotal	58,961	21,501	43,721	14,721

District 49

Harrison MS County

VTD: 202	2,406	52	1,831	29
VTD: 203	2,219	336	1,633	244
VTD: 204	5,880	1,343	4,346	922
VTD: 205	542	57	466	43
VTD: 207	1,692	360	1,303	216
VTD: 208	1,053	33	833	24
VTD: 209	1,899	33	1,475	21
VTD: 210	6,081	589	4,379	397
VTD: 211	8,160	1,256	6,112	833
VTD: 213	5,103	870	3,702	507
VTD: 214	3,247	301	2,547	233
VTD: 215	731	82	618	58
VTD: 401 (part)	0	0	0	0
VTD: 406	1,651	1,110	1,274	855
VTD: 503	7,182	1,606	5,671	1,094
VTD: 504	2,799	343	2,237	246
VTD: 505	4,753	878	3,685	610
VTD: 510 (part)	2,423	351	1,887	230
Harrison MS County Subtotal	57,821	9,600	43,999	6,562
District 49 Subtotal	57,821	9,600	43,999	6,562

District 50

Harrison MS County

VTD: 101	265	27	222	15
VTD: 102	852	213	657	143
VTD: 103	700	368	556	285
VTD: 104	1,771	1,150	1,279	812
VTD: 105	631	115	538	96
VTD: 106	524	255	421	195
VTD: 107	1,207	272	904	142
VTD: 108	2,064	327	1,661	222
VTD: 109	3,435	530	3,279	500
VTD: 110	4,487	916	3,156	604
VTD: 111	11,373	1,738	8,358	1,123
VTD: 112	1,764	73	1,354	48
VTD: 113	554	28	406	18
VTD: 114	1,609	177	1,306	144
VTD: 501	1,263	226	931	158
VTD: 502	5,082	956	3,980	645
VTD: 506	4,375	228	3,301	156
VTD: 507	3,203	207	2,405	148
VTD: 508	3,387	56	2,556	41
VTD: 509	6,305	1,048	4,781	722
VTD: 510 (part)	1,662	197	1,254	147

Plan: TRP_1

Type:

Administrator:

User:

Jason Knight/Ben Collins

District 50 (continued)**Harrison MS County Subtotal****District 50 Subtotal****District 51**

Jackson MS County

	POPULATION	Black	[18+_Pop]	[18+_Blk]
Harrison MS County Subtotal	56,513	9,107	43,305	6,364
District 50 Subtotal	56,513	9,107	43,305	6,364
District 51				
Jackson MS County				
VTD: Big Point	3,830	27	2,797	22
VTD: Cartersville	329	12	238	7
VTD: Chico	2,133	896	1,570	603
VTD: Chico A	1,432	603	985	369
VTD: East Central	9,040	478	6,493	333
VTD: Eastside	1,311	524	1,094	410
VTD: Escatawpa	4,303	1,057	3,337	691
VTD: Escatawpa A	3	0	3	0
VTD: Escatawpa B	0	0	0	0
VTD: Fountainbleau (<i>part</i>)	1,834	162	1,322	100
VTD: Gautier A	264	5	211	3
VTD: Griffin Heights	944	374	769	269
VTD: Gulf Hills A	3,327	380	2,500	264
VTD: Gulf Hills B	109	4	90	4
VTD: Helena	2,472	166	1,945	104
VTD: Hickory Hills A	499	29	414	19
VTD: Hwy 57	240	0	171	0
VTD: Hwy 57 A	521	11	377	7
VTD: Jefferson Street	2,280	2,023	1,705	1,497
VTD: North Pascagoula	700	74	547	54
VTD: North Vancleave	3,409	263	2,537	209
VTD: North Vancleave A	465	0	340	0
VTD: Ocean Springs Civic Center	3,102	284	2,310	200
VTD: Orange Grove	1,809	83	1,458	60
VTD: Orange Grove A	722	275	530	190
VTD: Rec Center	1,542	1,212	1,247	966
VTD: Rec Center A	88	44	73	37
VTD: Red Hill	414	0	292	0
VTD: Red Hill A	115	0	81	0
VTD: South Vancleave	4,090	101	2,995	70
VTD: South Vancleave A	1,827	48	1,379	39
VTD: Sue Ellen	2,371	2,211	1,879	1,746
VTD: Union Hall	2,694	2,454	1,990	1,808
VTD: Wade A	193	23	149	13
VTD: YMBC/Dantzler	1,442	1,001	1,150	784
Jackson MS County Subtotal	59,854	14,824	44,978	10,878
District 51 Subtotal	59,854	14,824	44,978	10,878

District 52

Jackson MS County

VTD: American Legion	816	84	632	59
VTD: Arlington	1,245	677	836	402
VTD: Arlington A	5	1	4	1
VTD: Eastlawn	2,509	226	1,876	136
VTD: Fair	3,339	2,069	2,549	1,468
VTD: Fair A	132	59	99	39
VTD: Fair B	105	55	76	41

Plan: TRP_1

Administrator:

Type:

User:

Jason Knight/Ben Collins

POPULATION

Black

[18+_Pop]

[18+_Blk]

District 52 (continued)

Jackson MS County (continued)

VTD: Fountainbleau (<i>part</i>)	5,099	851	3,413	463
VTD: Gautier	8,473	2,356	6,404	1,539
VTD: Gautier B	223	26	186	20
VTD: Gautier C	3,826	2,200	2,590	1,361
VTD: Girl Scout	1,373	719	977	484
VTD: Girl Scout A	654	194	497	141
VTD: Gulf Park Estates	6,004	466	4,318	289
VTD: Gulf Park Estates A	154	4	103	4
VTD: Hickory Hill	3,755	880	2,706	548
VTD: Nazarene	2,143	757	1,491	445
VTD: Ocean Springs Armory	5,332	455	4,215	352
VTD: Ocean Springs Civic Center A	7,507	427	5,712	313
VTD: Ocean Springs Comm Center	454	15	387	11
VTD: Pinecrest	1,135	259	852	168
VTD: Pinecrest A	1,009	119	757	80
VTD: Presbyterian	1,022	44	824	27
VTD: Presbyterian A	21	3	21	3
VTD: Presbyterian B	153	25	113	13
VTD: Sacred Heart	1,731	166	1,330	109
VTD: Villia Maria	728	7	658	7
Jackson MS County Subtotal	58,947	13,144	43,626	8,523
District 52 Subtotal	58,947	13,144	43,626	8,523
State totals	2,967,297	1,098,385	2,211,742	767,499

EXHIBIT 7

SUPPLEMENTAL REPORT OF PETER A. MORRISON, PH.D.

in THOMAS, et al. v. BRYANT, et al.

January 18, 2019

1. I have been retained as an expert in the case of *Thomas et al., Plaintiffs vs. Bryant et al., Plaintiffs* by Tommie S. Cardin of the Butler Snow Law Firm. I have been asked to evaluate Plaintiffs' First Amended Complaint seeking to invalidate SD 22 as violative of Section 2 of the Voting Rights Act. My evaluation relies on the following sources: (1) official demographic data from the US Census Bureau, (2) official electoral data from the Mississippi Secretary of State "Election and Voting" website (accessed at: www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx), (3) publicly available historical documents reporting election results, and (4) Plaintiffs' Complaint and expert reports by Mr. Cooper.

2. I am an applied demographer and am retired from The RAND Corporation, where I was Senior Demographer and the founding director of RAND's Population Research Center. I have provided testimony in litigation pertaining to the Voting Rights Act and districting plans and have constructed and/or evaluated numerous proposed local redistricting plans. I have made invited presentations on demographic aspects of redistricting to members and/or staff of the U. S. House of Representatives Subcommittee on the Census, the County Counsels' Association of California, the League of California Cities, the National League of Cities, and the Population Association of America. I have served on the U.S. Census Bureau Advisory Committee on Population Statistics, 1989-1995; and as an invited participant on the Bureau's Working Group on 2010 Race and Ethnicity. I have been elected as President of the Southern Demographic Association and to the Board of Directors of the Population Association of America, which are the two leading associations of professional demographers; and have taught students at the RAND Graduate School. I am being compensated at a rate of \$250/hour for my work in reviewing the materials and preparing this report. I will be compensated at a rate of \$400/hour for any testimony.

3. Attached Appendix A lists all cases in which I have testified by declaration, deposition, or at trial in the past four years. Attached Appendix B summarizes my academic background, including all publications in the last ten years.

I. FINDINGS AND CONCLUSIONS

4. Plaintiffs allege that African-American voters in Senate District 22 (“SD 22”) are politically cohesive, and that White bloc voting usually prevents African-American voters from electing their candidate of choice in SD 22 elections. Plaintiffs assert that SD 22 can be modified to provide African-American voters an equal opportunity to elect candidates of their choice. Plaintiffs propose to accomplish that modification by interchanging 16 precincts between existing SD 22 and SD 23, leaving the remainder of the Senate plan untouched.

SUMMARY OF FINDINGS AND CONCLUSIONS

5. **Defendant’s SD 22 is part of a lawful plan that was drawn in 2012. SD 22 and that plan remain lawful.** Redistricting is an undertaking to (re)draw district boundaries every decade, following the decennial Census and is based upon then-current data. SD 22 is part of a statewide redistricting plan adopted by the Mississippi Legislature in May 2012 and precleared by the U.S. Department of Justice on September 14, 2012. Plaintiffs propose to replace an existing lawfully-drawn district with an alternative district, drafted by Mr. Cooper.

6. **African-American preferred candidates (of whatever race) frequently run for office and usually win in the territory comprising SD 22. These demographic facts discredit Plaintiffs’ claim that Whites usually defeat African-American preferred candidates by consistently voting together as a bloc.**¹ I have identified 152 separate instances in which a candidate favored by AA voters has been elected to local public office throughout the territory included in State Senate District 22 since 2007. Those 152 instances exceed half of all the instances in which an AA candidate sought election to local office throughout State Senate District 22 since 2007. This universe of candidacies for local office provides a solid scientific basis for evaluating Plaintiffs’ claim that Whites usually defeat AA-preferred candidates by consistently voting together as a bloc.

7. **In crafting proposed alternative SD 22, Mr. Cooper has subordinated traditional redistricting principles and instead given predominant emphasis to race in constructing his Illustrative Plan.** He manipulated district boundaries for the sole purpose of increasing African-Americans’ share of voting-age persons from 50.8% to 62%. To do so, however, would split county lines and the boundaries of at least one incorporated city, and damage the compactness of adjacent SD 23.

8. **Mr. Cooper’s proposed alternative SD 22 would necessarily dilute the voting strength of African-American voters in adjacent SD 23.** SD 23 is part of a lawful plan that was drawn in 2012 to afford AAs an influential 42% share of the eligible voters in SD 23. Mr. Cooper’s proposed modifications to this plan would reduce that influential 42% share to only 31%. That would constitute an unlawful dilution of AAs’ voting strength in SD 23.

¹ I use the terms “African-American preferred” and “African-American favored” synonymously. I refer to “African Americans” ahead as “AA” and also as “Black” (consistent with Census Bureau terminology).

9. Overall, Plaintiffs' proposed alternative would strip African-American voters of two districts in which they are now influential. AAs now constitute 51.3% and 46.6% of 2015 voting-age citizens in these two districts under the existing 2012 plan. Plaintiffs proposal would "pack" AAs into a single district (SD 22), where they would constitute 62% of voters; and "crack" their existing concentration in the other district (SD 23), severely diluting their influence there.

STATEWIDE HISTORICAL CONTEXT

10. In Mississippi, African-American political participation has reached successively higher peaks in recent years (see Table 1). From 2004-2010, 72% to 82% of African-American eligible voters were registered to vote; thereafter, the percentage has ranged from 81% to 91%. African-Americans who actually voted has ranged from 49% to 73% (2004-2010) and from 47% to 82% (2012-2016). These successively higher peaks in recent years parallel national trends.² Mississippi has more minority elected officials than any other state.³ These data furnish convincing evidence that African Americans in Mississippi have access to the political process and have participated in that process at ever higher rates in recent years. In addition to demonstrating progressive improvement, the data show that existing socioeconomic differences no longer diminish AAs' participation in the political process as they did in the past

Table 1

Political Participation by Race in Mississippi: 2004-2016							
Race	2004	2006	2008	2010	2012	2014	2016
<i>Percent Registered to Vote</i>							
Black	76%	72%	82%	74%	91%	83%	81%
White	74%	71%	75%	74%	82%	73%	79%
<i>Percent Voting</i>							
Black	67%	50%	73%	49%	82%	47%	69%
White	60%	40%	68%	48%	72%	40%	68%
Note: Race refers to Black alone and White alone non-Hispanic VAP (2004-10)/CVAP (2010-16).							
Source: US Census Bureau, Current Population Survey, Voting and Registration Tables. https://www.census.gov/topics/public-sector/voting/data/tables.html							

² This conclusion is supported by the Amicus Brief filed by Professors Gaddie, Bullock, and Anolabehere in *Alabama Legislative Black Caucus*. See pp. 11-12, where they addressed the increased levels of voter participation, registration, and turnout. Alabama's data on these points parallels Mississippi's. Years earlier, Chief Justice Roberts echoed the turnout conclusion on a broader national level in *Shelby County v. Holder* ("By 2009, the racial gap in voter registration and turnout [was] lower in the States originally covered by §5 than it [was] nationwide." Since then, Census Bureau data show that African-American voter turnout has come to exceed White voter turnout in five of the six States originally covered by §5.

³ This was so as of 2009. See C. S. Bullock III and R. K. Gaddie, *The Triumph of Voting Rights in the South* (Norman: University of Oklahoma Press, 2009), pp. 34-57. (At p. 56: "More blacks hold public office in the Magnolia State (nearly nine hundred) than anywhere else in the United States...").

EVALUATION OF PLAINTIFFS' ALLEGATIONS

11. Central to Section 2 of the VRA is the question of whether candidates favored by African American voters fail to get elected, and if so why? In this section, I address two specific testable questions: (i) Do *African American-favored candidates* fail to get elected when they run for local office throughout SD 22? (ii) Do white voters *usually defeat* the African-American favored candidate by consistently voting together as a bloc?

IDENTIFICATION OF AFRICAN AMERICAN-PREFERRED CANDIDATES

12. A variety of different methodologies are used to identify the African-American-preferred candidate in a given election. Each method relies upon a particular type of data and minimum number of observations.

13. Mississippi Senate District 22 includes portions of six Mississippi counties. Each of these six counties affords the analyst only a few precincts as observations for identifying which candidate (if any) in a given election was the preferred candidate of African-American voters. With so few observations, political scientists' method of *ecological inference* may yield inconclusive results—just as a biased coin, flipped just a dozen times, may not prove it is biased beyond a reasonable doubt.

14. In several of these six counties, the demographers' method of *homogeneous precincts* can indicate (with differing certainty) which candidate in a particular election was African Americans' preferred candidate. Courts have acknowledged that the African-American-favored candidate need not be an African American; and that homogeneous precincts reveal African American-favored candidates who are not themselves African-American. Even a single homogeneous precinct affords a supplementary validation check on other methods identifying the candidate whom African-American voters favored in a particular election.

15. The method of homogeneous precincts I have used is well suited to the data that are available. I have applied this method in accordance with established demographic practice: Any precinct where African-Americans constitute at least 90% of that precinct's eligible voters is a *homogeneously African-American* precinct. I classify any candidate who was the top vote getter in such districts as African-Americans' favored candidate (absent evidence to the contrary).

DETECTION OF WHITE BLOC VOTING

16. My method of choice here acknowledges that *circumstantial* evidence may show White bloc voting (WBV). I grant that WBV *may* exist wherever circumstantial evidence so indicates. For any given election, then, the question is: *Did the African-American-favored candidate lose and was WBV a possibility?*

OVERALL OUTCOMES FOR AFRICAN AMERICAN-FAVORED CANDIDATES

17. In these six counties comprising SD 22, African American-favored candidates have won election to at least 41 local offices in 2007; at least 17 of those wins were contested races. AA-favored candidates have won election to at least 53 local offices in 2011; at least 22 of those wins were in contested races. (See Table 2 below and Appendix Table 1; corresponding data for 2015 are being tabulated for inclusion.)

18. This universe of candidacies for local office in each successive year provides a scientific basis for evaluating Plaintiffs' claim that White bloc voting usually defeats African-American-favored candidates who run for office. Table 2 summarizes these data for 2007, 2011, and 2015. I reserve the right to correct these data in my forthcoming deposition testimony.

Table 2

County	No. of African-American Favored Candidates Elected					
	2007 Elections		2011 Elections		2015 Elections	
	No.	% contested	No.	% contested	No.	% contested
Bolivar	8	38%	13	23%	13	38%
Humphreys	5	40%	7	43%	9	78%
Madison	4	50%	4	50%	3	33%
Sharkey	7	86%	7	71%	10	70%
Washington	15	13%	15	33%	17	41%
Yazoo	2	100%	7	57%	8	25%
Total	41	41%	53	42%	60	48%
Source: Appendix Table 1.						

19. The data in Table 2 show that candidates favored by African-American voters have been elected to local office on a regular basis throughout State Senate District 22 since at least 2007. Specifically, these data (and especially the data from Appendix Table 1 summarized here) document that (i) AA and AA-favored candidates frequently run for local office and win; (ii) the number of AA and AA-favored candidates serving as elected office holders has steadily increased since 2007, from 41 to 53 to 60; and (iii) instances in which an AA or AA-favored candidate has been defeated by a White-favored voter are exceedingly few. (Only 4 such defeats appear among the universe of candidacies shown in Appendix Table 1.) *These facts discredit Plaintiffs' claim that Whites usually defeat AA-favored candidates by consistently voting together as a bloc.*

20. The data supporting these conclusions are official statements of vote, which show results of every local election held in these six counties in every general election since November 2007.

(accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx). This universe of local elections affords a large, representative statistical basis for evaluating local patterns of voting throughout SD 22 as of 2007 and 2011 with respect to the two questions in Paragraph 11 above: (i) Do *African-American favored candidates* fail to get elected when running for local office throughout SD 22? (ii) Do white voters *usually defeat* the African-American-favored candidate by consistently voting together as a bloc?

21. I have compiled and cross-checked historical records in order to classify each candidate in this large universe by race (shown in Appendix Table 1). The racial identity of some candidates necessarily remains unknown or undocumented. Appendix Table 2 (under preparation) will present a complete updated list of candidates whose racial identities is known with a high degree of scientific certainty. Any candidate not on that list is classified hereafter as “unknown” (a shorthand for “not known with high scientific certainty”).

FINDINGS BASED UPON 2007, 2011, AND 2015 ELECTIONS

22. Referring first to the 2007 election, I can confidently identify the African-American (or African American-favored) candidate in the 17 contested local elections (see Appendix Table 1). In other such elections, 20 viable candidates of unknown race ran and lost.⁴ Some of those 20 losing candidates of unknown race may have been racially African-American or African-American-favored candidates. The fact that 3 of these 20 were Republicans lessens the most extreme possibility (that all 20 were AA or AA-favored candidates). Assuming those 3 were not the favored candidate of AA voters, that leaves at most 17 *possibly* AA-favored candidates who lost.

23. By comparison, I can document 17 other candidates known to be the favored choice of African-American voters who were in fact elected. Referring to the 17 losing candidates of unknown race, it is implausible that not a single one of them is White. Therefore, I conclude with a high degree of confidence that White bloc voting (WBV) does not usually result in the defeat of the majority African-American favored candidates.

24. Regarding the 2011 and 2015 elections, I followed the same logic and calculated that fewer than half of African-American (or African-American-preferred) candidates of unknown race lost.

25. Clearly, candidates favored by African-American voters have been elected on a regular basis throughout State Senate District 22 since at least 2007. With reference to the two questions posed initially at Paragraph 11 above:

(i) Do *African-American favored candidates* fail to get elected when they run for local office within SD 22? *Answer: Not usually.*

(ii) Do white voters *usually defeat* the African-American-favored candidate in those elections by consistently voting together as a bloc?
Answer: No.

⁴ By my definition, a viable candidate is one who received at least one-tenth of all votes cast.

FURTHER OBSERVATIONS ON MR. COOPER'S REPORT

26. Plaintiffs' expert William Cooper proposes to amend SD 22 without considering the derivative consequences of interchanging territory with SD 23. One cannot justly ignore those derivative consequences, since they bear directly on the traditional districting principles referenced at the time that Mississippi state senate districts were drawn.⁵ These are: (1) **Compactness**: Keeping the distance between all the parts of a constituency to a minimum; (2) **Preserving counties and other political subdivisions**: Respecting county, city, and town boundaries; (3) **Preserving communities of interest**: Respecting geographical areas, such as unincorporated communities, neighborhoods of a city, or regions of a state whose residents have shared political interests.

27. *Mr. Cooper's proposed alternative SD 22 gives predominant emphasis to race, thereby subordinating other traditional redistricting principles.* Quoting Mr. Cooper:

"17. In sum, the Illustrative Plan demonstrates that an alternative majority-Black Senate District 22 can be drawn with a BVAP [Black voting-age population] that is 11 percentage points higher than the 50.77% BVAP district under the 2012 Plan."
[Cooper Report, page 7]

Mr. Cooper has sought to maximize African-Americans' share of the eligible voters in SD 22 with no thought to balancing traditional districting principles when modifying SD 22 and SD 23. More generally, this highlights Mr. Cooper's flawed assumption that African-American are fungible pockets of like-minded voters, to be moved about among districts.

28. *Regarding compactness, Mr. Cooper repeatedly misstates his proposed plan.* Quoting him once again:

"22. District 22 and District 23 as reconfigured under the Illustrative Plan comply with the one-person one-vote rule, are contiguous, are **more compact than in the current configuration, and do not dilute minority voting strength.**"
[Cooper Report, page 8. Emphasis added]

In paragraph 22 above, Mr. Cooper misstates the consequences of his proposed changes for compactness. He cites the Reock score, which measures the extent to which the shape of a

⁵ As reflected in the Section 5 Senate Submission, the Standing Joint Committee adopted the following redistricting criteria to guide the redistricting process: (1) Each district's population should be less than 5% above or below the mean population of a district; (2) Districts should be composed of contiguous territory; (3) The redistricting plans should comply with all applicable state laws and federal laws including Sections 2 and 5 of the Voting Rights Act and the Mississippi and United States Constitutions. Mississippi state law sets forth the traditional redistricting principles that shall be followed in Miss. Code Ann. § 5-3-101.

district is spread out from its center. A district's Reock score falls within the range of zero to 1; a score closer to 1 indicates a district that is *more* compact. Quoting Mr. Cooper (at paragraph 20):

“Under the Reock compactness measure, Illustrative Plan District 22 scores .26 and District 23 scores .20. In comparison, 2012 Plan SD 22 scores .25 and SD 23 scores .34.”
[Cooper Report, page 8]

29. By his own measure, then, Mr. Cooper's proposed alternative SD 23 is *less* compact, i.e., its Reock score of .20 is *lower*, than that of SD 23 as adopted in 2012 (Reock score: .34). In a concluding paragraph, he misstates this established fact:

“26. I also conclude that a 62% BVAP-majority Senate district can be drawn by exchanging whole precincts between SD 22 and SD 23 as drawn under the 2012 Plan. The resulting districts are reasonably compact, *particularly in comparison to the existing districts.*”
[Cooper Report, page 11. Emphasis added]

30. Mr. Cooper further misstates that his proposed plan does not dilute minority voting strength:

“22. District 22 and District 23 as reconfigured under the Illustrative Plan comply with the one-person one-vote rule, are contiguous, are more compact than in the current configuration, and *do not dilute minority voting strength.*”
[Cooper Report, page 8. Emphasis added]

His statement at para. 22 above is incorrect. Plaintiffs' proposed alternative would strip African-American voters in each of two districts--SD 22 and SD 23--in which they are now influential. According to Cooper, African-Americans were 50.8% and 42.0% of 2010 voting-age persons in these two districts as now configured.⁶ It is my understanding that some political scientists might regard SD 22 as an “opportunity” district and SD 23 as an influence district. (Political scientists differ on exact definitions here.)

31. Cooper's proposed plan would modify these two existing districts, “packing” African-Americans into one district (SD 22), where they would constitute 62% of voters; and “cracking” their concentration in the other district (SD 23), rendering them no longer influential.

32. *Regarding preservation of counties and other political subdivisions, it appears that Mr. Cooper's plan would split both Warren County and, within it, the City of Vicksburg.* See Figure 1 below

33. Overall, Mr. Cooper has subordinated traditional redistricting principles and instead given predominant emphasis to race in constructing his Illustrative Plan. He manipulated district

⁶ For the record, African-Americans now constitute, respectively, 51.3% and 46.6% of 2015 voting-age citizens in these two districts as now configured.

boundaries for the sole purpose of increasing African-Americans' share of voting-age persons from 50.8% to 62%.

34. To do so, however, he would split county lines and the boundaries of at least one incorporated city, and damage the compactness of adjacent SD 23. His proposed alternative SD 22 would necessarily dilute the voting strength of African-American voters in adjacent SD 23, reducing that influential 42% share to just 31%. That would constitute an unlawful dilution of African-Americans' voting strength in SD 23.

35. His proposed alternative would strip African-American voters of two districts in which they now constitute 51.3% and 46.6% of *2015 voting-age citizens* under the existing 2012 plan. By today's measures, African-American voters enjoy both "opportunity" (a 51.3% majority) and "influence" (a 46.6% share).

36. Instead, he would "pack" African-Americans into a single district (SD 22), where they would constitute 62% of the voters; and "crack" an existing concentration of African-American voters in the other district (SD 23), severely diluting their influence there (from 46.6% to about 31%.

Signature:



Peter A. Morrison
January 18, 2019

APPENDIX A

See Attachment

Peter A. Morrison, Ph. D.

CASES I HAVE TESTIFIED IN SINCE AUGUST 2012

1. ZORAIDA RIOS-ANDINO et al. v. ORANGE COUNTY. UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF FLORIDA, ORLANDO DIVISION. Expert Report on behalf of Defendant.
2. JAMES FIGGS AND ROBERT JACKSON v. QUITMAN COUNTY, MS. UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF MISSISSIPPI, GREENVILLE DIVISION. Affidavit in Support of Defendants' Motion for Summary Judgment.
3. U.S. v. TOWNHOMES OF KINGS LAKE, HOA, INC. et al. MIDDLE DISTRICT OF FLORIDA. DJ# 175-17M-499. Declaration on behalf of Plaintiff U.S. Department of Justice.
4. EVENWEL v. PERRY, UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS.
Declaration on behalf of Plaintiffs seeking to enjoin Texas from conducting further state Senate elections under Plan S172 and asking the court to require the Texas Legislature to reapportion state senatorial voting districts in conformity with the Fourteenth Amendment.
5. EVENWEL et al. v. ABBOTT et al., UNITED STATES SUPREME COURT.
"Brief of Demographers Peter A. Morrison, et al. as *Amici Curiae* in Support of Appellants," in Evenwel et al. v. Abbott et al.
6. PAULETTE KREMMELE v. FAIRLIFE LLC, UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF ILLINOIS. Declaration on behalf of Defendant.
7. DR. PANKAJ JAIN, Plaintiff v. COPPELL INDEPENDENT SCHOOL DISTRICT, et al., U.S. District Court, Northern District of Texas, Dallas Division. Declaration on behalf of Defendant.
8. Glatt v. City of Pasco, et al., U.S. District Court, Eastern District of Washington. Declaration on behalf of Defendant. (Court ruled in favor of Defendant)
9. Bishop, et al. v. Shorter University, Inc., Civil Action No. 4:15-CV-0033-HLM, United States District Court for the Northern District of Georgia, Rome Division. Declaration on behalf of Defendant.
10. Feldman et al. v. Arizona Secretary of State's Office et al., United States District Court, District of Arizona. Declaration on behalf of Defendant.
11. Timothy Dadey et al. v. City of Costa Mesa, Case No. 30-2014-00757962-CU-CR-CJC and Timothy Dadey et al. v. City of Costa Mesa, Case No. 30-2014-00758104, pending in the Superior Court of the State of California for the County of Orange. Deposition testimony.
12. Anne Harding et al. v. County of Dallas, Texas et al. U.S. District Court, Northern District of Texas, Dallas Division. C.A. No. 3: 15-CV-00131-D. Deposition and trial testimony on behalf of Plaintiffs.
13. Pico Neighborhood, et al. v. City of Santa Monica, et al. Superior Court of the State of California for the County of Los Angeles, No. BC616804. Deposition and trial testimony on behalf of Defendant.

(Updated: December 26, 2018)

APPENDIX B

See Attachment

PETER A. MORRISON

CONTACT INFORMATION

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EDUCATION

B.A., Sociology, 1962, Dartmouth College

Ph.D., Sociology, 1967, Brown University

PROFESSIONAL EXPERIENCE

2009-present — President, Peter A. Morrison & Associates, Inc., Nantucket, MA

1969-2009 — Senior Staff Demographer and Resident Consultant, The RAND Corporation,
Santa Monica, California

1979-1990 — Founding Director, Population Research Center, RAND

1967-1969 — Assistant Professor, Department of Sociology, and Research Associate,
Population Studies Center, University of Pennsylvania, Philadelphia

AREAS OF EXPERTISE

Dr. Morrison's principal expertise centers on applications of demographic analysis in tracking socioeconomic trends and envisioning their consequences for public policy and business.

Domestic applications include demographic analysis for electoral redistricting; store site selection; human resource analysis; evaluating employment discrimination claims, minority representation within jury pools, and school desegregation remedies; forecasting school enrollments; and using census and administrative data to monitor local community demographic contexts.

International applications include business concerns with corporate strategic planning, globally emerging middle-class consumer markets, and demographic precursors of expanding consumer markets; comparing and evaluating individual markets; and identifying potential business opportunities spurred by forthcoming demographic change.

Dr. Morrison conducts studies for the private sector and offers executive briefings on these topics through his consulting firm, founded in 1984. Clients have included American Express, American Stores, Corning, Inc., Ford Motor Co., Marriott International, NBC, New Directions for News, Times Mirror, University of California, and CIBC Securities (Canada).

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Previously, Dr. Morrison was a faculty member at the University of Pennsylvania. He also has taught periodically at UCLA, the RAND Graduate School, and the Helsinki School of Economics. He also lectures before academic and business audiences and gives invited testimony before subcommittees of the U.S. Senate and House of Representatives. He has made invited presentations to the National Science Board, the Conference Board, the National League of Cities, the National Conference of State Legislatures, the University of California Management Institute, the American Bar Association, American Society of Newspaper Editors, newsroom seminars for the Casey Journalism Center, County Counsels Association of California, American College of Surgeons, National Association of Homebuilders, Missouri Legislative Forum, World Future Society, and Volunteers of America.

He has served as advisor to the Committee for Economic Development, the Congressional Research Service, and committees of the National Academy of Sciences, U.S. Census Bureau, Department of Agriculture, National Institutes of Health, California Energy Commission, California Governor's Council on Growth Management, Center for California Studies, and United Way.

PROFESSIONAL ORGANIZATIONS/HONORS

Invited participant, U.S. Census Bureau Working Group on 2010 Race and Ethnicity

Member, L.A. Unified School District Enrollment Analysis Technical Advisory Committee

Visiting Lecturer, Helsinki School of Economics and Business Administration, summer 2001

U.S. Census Bureau Advisory Committee on Population Statistics, 1989-1995 (Chair, 1990).

Population Association of America: Board of Directors, 1978-1980; Public Affairs Committee, 1979-1986; Chair, Nominations Committee, 1981-1982; annual Program Organizing Committee, 1995, 1998; Local Arrangements Committee, 2000; Committee on Applied Demography, 1995-1999, Chair, 1998; Development Committee, 2006-2012.

Southern Demographic Association: Board of Directors, 1999-present; Vice President, 2001; President, 2003.

Center for Spatially Integrated Social Science, UC Santa Barbara: Advisory Board, 2000-

Research Advisory Board, Committee for Economic Development, 1988-1991.

Regents' Lecturer, UCLA, Spring 1987.

Social Science Research Council's Committee on the Survey of Income and Program Participation, 1985-1988.

National Advisory Child Health and Human Development Council, National Institute of Health, 1984-1987.

Population Research Committee, National Institute of Child Health and Human Development, 1977-1979.

Committee on Behavioral and Social Aspects of Energy Consumption and Production, National Academy of Sciences, 1980-1982.

Committee on Urbanization and Population Redistribution, International Union for Scientific Study of Population, Chairman, 1976-1979.

Advisory Subcommittee for Applied Social and Behavioral Sciences, National Science Foundation, 1978-1981.

Future of Rural America Advisory Committee, FHA, 1978-1981.

Editorial Advisory Committee, *Urban Studies*, 1985-1995.

Editorial Advisory Board, *J. Australian Population Assoc.*, 1995-1998.

RECENT MEDIA APPEARANCES/COVERAGE:

Interviews: CNBC; New York Times; Los Angeles Times; USA Today; Time Magazine; Seattle Times; AMA/Marketing News

Commentary: Washington Post; New York Times; Wall Street Journal; International Herald Tribune; Pittsburgh Post-Gazette; Los Angeles Times; Atlanta Constitution; Houston Chronicle; San Jose Mercury News; Providence Journal; San Antonio Express-News

Articles: "United Nations of Nantucket," *N Magazine* (Winter 2016).
(access at: www.n-magazine.com/united-nations-nantucket/)

RECENT PRESENTATIONS:

- 10/13/2016: "A Demographic Accounting Model for Class Action Litigation," presented at 2016 Southern Demographic Association meetings, Athens, GA. (coauthored with Thomas Bryan).
- 10/22/2015: At Nantucket Historical Association's "Food for Thought" series:
"Immigration on Nantucket: What You Should Know"
<https://www.youtube.com/watch?v=u17rINVweZs> (Morrison presentation starts at minute 2:10)
- 01/08/2015: To Waterbury, CT **"Alderman by District Reapportionment Commission"** Meeting
<https://www.youtube.com/watch?v=aj6qE3JECg0&feature=youtu.be>
 (Morrison presentation start at minute 23:10)
- 01/14/2015: To Waterbury, CT **"Aldermen by District Reapportionment Commission"** meeting:
https://www.youtube.com/watch?v=98Vp4y11_sc (Morrison presentation starts at minute 9:10)
- 12/2014: **"Investing in Nantucket's Future"** <http://vp.telvue.com/preview?id=T02542&video=223735>
 (Morrison presentation starts at minute 1:30)
- 11/2013: **"Growing Old: How Aging Populations Will Transform Our Lives and Times"**
http://www.youtube.com/watch?v=kJvS_hhgLDk&feature=c4-overview-vl&list=PLjgJVmnztYsTqYVn_ijBhCGxA5-7DMtGw (Morrison presentation starts at minute 1:05)

SELECTED RECENT PUBLICATIONS/PAPERS/POLICY BRIEFS

Most of my publications (or abstracts) are accessible at these sites:

https://www.researchgate.net/profile/Peter_Morrison2/publications?sorting=newest&page=2

www.rand.org/pubs/authors/m/morrison_peter_a.html

"Estimating Nantucket's Effective Population," under review by *Population Research & Policy Review* (coauthor).

"Distinguishing 'False Positives' Among Majority-Minority Election Districts in Statewide Congressional Redistricting," 2017 Southern Demographic Association meetings (coauthor).

"A Comparison of Methods for Classifying and Modeling Respondents Who Endorse Multiple Racial/Ethnic Categories: A Healthcare Experience Application," in press, *Medical Care* (coauthor).

"Can Puerto Ricans Spark a Latino Political Backlash?" op-ed in *San Antonio Express-News*, February 13, 2018 (coauthored with Charles S. Bullock, III).

Access at: https://www.researchgate.net/publication/323200663_Can_Puerto_Ricans_spark_a_Latino_political_backlash

"Focus on Teaching: The Legend of the Calamity-Induced Baby Boom," PAA Affairs, Spring 2017. Access at: https://www.researchgate.net/publication/315683457_Focus_on_Teaching_The_Legend_of_the_Calamity-Induced_Baby_Boom

"The Demography of Trump's Wall," *N-IUSSP*, April 3, 2017 (coauthor).

Access at: www.niussp.org/article/demography-trumps-walle-mur-de-trump-et-ses-consequences-demographiques/

"Three Myths of U.S. Immigration," op-ed in *San Antonio Express-News*, March 4, 2017 (coauthored with Dudley L. Poston, Jr.).

Access at: www.mysanantonio.com/opinion/commentary/article/Three-myths-of-U-S-immigration-10975928.php

"From Legal Theory to Practical Application: A How-To for Performing Vote Dilution Analysis," *Social Science Quarterly* (2017), coauthor.

Assess at: https://www.researchgate.net/publication/315631377_From_Legal_Theory_to_Practical_Application_A_How-To_for_Performing_Vote_Dilution_Analyses_From_Legal_Theory_to_Practical_Application

"Foreward" to D. A. Swanson, ed., *The Frontiers of Applied Demography* (2017)

Assess at: https://www.researchgate.net/publication/311486631_Foreward_to_The_Frontiers_of_Applied_Demography_2017

"Projecting Future Demand for Assisted Living in the US: A Case Study," chapter 6 in D. A. Swanson, ed., *The Frontiers Applied Demography* (2017).

Access at:

https://www.researchgate.net/publication/311800586_Projecting_Future_Demand_for_Assisted_Living_chap_6_in_THE_FRONTIERS_OF_APPLIED_DEMOGRAPHY

"Health Care Access: The Hollow Promise," op-ed in *Starkville Daily News*, 10/18/2016 (coauthored with Ron Cossman).

Access at: https://www.researchgate.net/publication/309458235_Health_Care_Access_The_Hollow_Promise

"We have the data to make voting fair. Let's use it." op-ed in *The Washington Post*, 10/22/2015

Access at: <http://www.washingtonpost.com/news/in-theory/wp/2015/10/22/we-have-the-data-to-make-voting-fair-lets-use-it/>

Supreme Court of the United States. "Brief of Demographers Peter A. Morrison, Thomas M. Bryan, William A. V. Clark, Jacob S. Siegel, David A. Swanson, and The Pacific Research Institute as *Amici Curiae* in Support of Appellants," in *Evenwel et al. v. Abbott et al.*

Access at: <http://www.scotusblog.com/wp-content/uploads/2015/08/Demographers-Amicus.pdf>

"Exploring the Blizzard Babies Phenomenon," op-ed in *Providence Journal*, March 3, 2015.

Access at: www.providencejournal.com/article/20150303/OPINION/150309836

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APPENDIX TABLE 1

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: BOLIVAR COUNTY					Homo- genous Black pcts.? (* = yes)	Unopposed =1	Contested =1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments			
BOLIVAR COUNTY - 2007					*		
Chancery Clerk: Haynes	Black	Won	Contested	Heavily favored by voters in the White homogeneous pct.			1
Circuit Court: Kelly	Black	Won	Unopposed			1	
County Prosec Atty: Thomas	Black	Won	Contested	Won despite indications of White bloc voting			1
Coroner: Brown	Black	Won	Unopposed	Includes strong white support		1	
Supervisor D3: Coleman	Black	Won	Contested				1
Supervisor D4: McBride	Black	Won	Unopposed			1	
Justice Ct. Judge D1: Ward, Sr.	Black	Won	Unopposed			1	
Justice Ct. Judge D3: Taylor	Black	Won	Unopposed			1	
Summary (Bolivar 2007): 8 Black/Black-preferred candidates elected, 3 of them in contested elections.					Total:	5	3
BOLIVAR COUNTY - 2011					*		
Chancery Clerk: Haynes	Black	Won	Unopposed			1	
Circuit Court: Kelly	Black	Won	Unopposed			1	
County Prosec Atty: Thomas	Black	Won	Unopposed			1	
Coroner: Brown	Black	Won	Contested				1
Supervisor D3: Billings	Black	Won	Contested				1
Supervisor D4: McBride	Black	Won	Unopposed			1	
Justice Ct. Judge D1: Ward, Sr.	Black	Won	Unopposed			1	
Justice Ct. Judge D3: Taylor	Black	Won	Unopposed			1	
District Attny D11: Mitchell	Black	Won	Unopposed			1	
Sheriff: Williams, Sr.	Black	Won	Contested				1
Supervisor D1: Williams	Black	Won	Unopposed			1	
Supervisor D5: King	Black	Won	Unopposed			1	
Constable 3: Scott	Black	Won	Unopposed			1	
Summary (Bolivar 2011): 13 Black/Black-preferred candidates elected, 3 of them in contested elections.					Total:	10	3
BOLIVAR COUNTY - 2015					*		
Chancery Clerk: Haynes	Black	Won	Unopposed			1	
Circuit Court: Kelly	Black	Won	Unopposed			1	
County Prosec Atty: Thomas	Black	Won	Unopposed			1	
Coroner: Seals, Jr.	Black	Won	Contested				1
Justice Ct. Judge D1: Ward, Sr.	Black	Won	Unopposed			1	
Justice Ct. Judge D3: Taylor	Black	Won	Unopposed			1	
District Attny D11: Mitchell	Black	Won	Unopposed			1	
Sheriff: Williams, Sr.	Black	Won	Contested				1
Supervisor D1: Calvin-Williams	Black	Won	Contested				1
Supervisor D3: Billings	Black	Won	Unopposed			1	
Supervisor D4: McBride	Black	Won	Unopposed			1	
Supervisor D5: King	Black	Won	Contested				1
Tax Coll. & Assessor Havens	Black	Won	Contested	Losing candidate is White			1
Summary (Bolivar 2015): 13 Black/Black-preferred candidates elected, 5 of them in contested elections.					Total:	8	5
Source: Official Recaptulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx					Grand Total:	23	11

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: HUMPHREYS COUNTY					Homo- genous Black pcts.? (* = yes)	Unopposed #1	Contested #1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments			
HUMPHREYS COUNTY - 2007					*		
Chancery Clerk: Browder	Black	Won	Unopposed			1	
Circuit Clerk: James-Jones	Black	Won	Unopposed			1	
Sheriff: Roseman	Black	Won	Contested	Top vote-getter in every precinct			1
Supervisor D5: Broomfield:	Black	Won	Unopposed			1	
Justice Court Judge: Cummings	Black	Won	Contested	Top vote-getter in every precinct			1
Summary (Humphreys 2011): 5 Black/Black-preferred candidates elected, 2 of them in contested elections.					Total:	3	2
HUMPHREYS COUNTY - 2011					*		
Chancery Clerk: Browder	Black	Won	Unopposed			1	
Circuit Clerk: James-Jones	Black	Won	Unopposed			1	
Sheriff: Roseman	Black	Won	Contested	Top vote-getter in every precinct			1
Supervisor D5: Broomfield	Black	Won	Unopposed			1	
Justice Court Judge: Brown-Cummings	Black	Won	Unopposed			1	
Supervisor D3: Brown	Black	Won	Contested				1
District Attny D21: Oliver	Black	Won	Contested				1
Summary (Humphreys 2011): 7 Black/Black-preferred candidates elected, 3 of them in contested elections.					Total:	4	3
HUMPHREYS COUNTY - 2015							
Chancery Clerk: Browder	Black	Won	Unopposed			1	
Circuit Clerk: James-Jones	Black	Won	Unopposed			1	
Sheriff: Roseman	Black	Won	Unopposed			1	
Supervisor D1: Bankhead	Black	Won	Unopposed			1	
Supervisor D3: Johnson	Black	Won	Contested				1
Supervisor D5: Broomfield	Black	Won	Unopposed			1	
Justice Ct. Judge-N: Gates	Black	Won	Contested				1
Justice Ct. Judge-S: Brown-Cummings	Black	Won	Unopposed			1	
Constable-North: Williams	Black	Won	Unopposed			1	
Summary (Humphreys 2015): 9 Black/Black-preferred candidates elected, 2 of them in contested elections.					Total:	7	2
Source: Official Recapitulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx					Grand Total:	14	7

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: MADISON COUNTY					Homo- genous Black pcts. ? (1=yes)	Unopposed =1	Contested =1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments			
MADISON COUNTY - 2007					1		
<i>Supervisor D4: Banks</i>	Black	Won	Contested				1
<i>Supervisor D5: Griffin</i>	Black	Won	Unopposed			1	
<i>Justice Court Judge 2: Chinn</i>	Black	Won	Contested				1
<i>Constable Dist. 2: Sims</i>	Black	Won	Unopposed			1	
<i>Summary (Madison 2007): 4 Black/Black-preferred candidates elected, 2 of them in contested elections.</i>							
MADISON COUNTY - 2011					0		
<i>Supervisor D4: Banks</i>	Black	Won	Contested				1
<i>Supervisor D5: Griffin</i>	Black	Won	Contested				1
<i>Justice Ct. Judge 2: Chinn</i>	Black	Won	Unopposed			1	
<i>Constable Dist. 2: Sims</i>	Black	Won	Unopposed			1	
<i>Summary (Madison 2011): 4 Black/Black-preferred candidates elected, 2 of them in contested elections.</i>							
MADISON COUNTY - 2015							
<i>Supervisor D5: Griffin</i>	Black	Won	Contested				1
<i>Justice Ct. Judge 2: Griffin</i>	Black	Won	Unopposed			1	
<i>Constable Dist. 2: Sims</i>	Black	Won	Unopposed			1	
<i>Summary (Madison 2015): 3 Black/Black-preferred candidates elected, 1 of them in contested elections.</i>							
Source: Official Recapitulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx					Grand Total:	6	5

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: SHARKEY COUNTY					Homo- genous Black pcts.? (1=yes)	Unopposed =1	Contested =1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments			
SHARKEY COUNTY - 2007					1		
District Attorney D9: Smith	White	Won	Contested	Was Black-preferred candidate in ea of the 5 Black homogeneous dists.			1
State Senate Dist 22: Hill	Black	Won	Contested	Was Black-preferred candidate in ea of the 5 Black homogeneous dists.			1
Circ. & Chancery Clerk: Williams	Black	Won	Unopposed			1	
Sheriff: Adams	Black	Won	Contested	Was Black-preferred candidate in ea of the 5 Black homogeneous dists.			1
Supervisor D2: Jones	Black	Won	Contested	Was Black-preferred candidate in ea of the 5 Black homogeneous dists.			1
Supervisor D3: Matthews	Black	Won	Contested				1
Just. Ct Judge Post 2: Secoy	unknown	Won	Contested	Was Black-preferred candidate in ea of the 5 Black homogeneous dists.			1
Summary (Sharkey 2007): 7 Black/Black-preferred candidates elected, 6 of them in contested elections.						1	6
SHARKEY COUNTY - 2011					1		
Constable Dist Post 1: Alford	Black	Won	Unopposed			1	
Circ. & Chancery Clerk: Williams	Black	Won	Unopposed			1	
Sheriff: Adams	Black	Won	Contested				1
Supervisor D2: Smith	Black	Won	Contested				1
Supervisor D3: Matthews	Black	Won	Contested				1
Supervisor D4: Evans	Black	Lost	Contested	LOST			1
Supervisor D5: Smith	Black	Won	Contested				1
Summary (Sharkey 2011): 7 Black/Black-preferred candidates elected, 5 of them in contested elections.						2	5
SHARKEY COUNTY - 2015					1		
Constable Dist Post 1: Alford	Black	Won	Contested	Alford won all 7 pcts,			1
Constable Dist Post 2: Marshall	Unknown	Won	Contested	Marshall apparently is Black-favored cadidate (heavy favorite in HB pcts.)			1
Circ. & Chancery Clerk: Williams	Black	Won	Unopposed			1	
Sheriff: Adams	Black	Won	Contested	Note: all 3 contestants are Black			1
Supervisor D2: Smith	Black	Won	Contested				1
Supervisor D3: Matthews	Black	Won	Unopposed			1	
Supervisor D4: Johnson	Black	Lost	Contested	White winner may be Black-favored candidate (see homog. Black dist. RF-4th			1
Supervisor D5: Smith	Black	Won	Contested				1
Justice Court Judge 1: Smith	Unknown	Won	Contested	Smith (Dem.) apparently is Black-favored cadidate (heavy favorite in HB pcts.)			1
Coroner: Eason	Black	Won	Unopposed			1	
Summary (Sharkey 2015): 7 Black/Black-preferred candidates elected, 5 of them in contested elections.						3	7
Source: Official Recapitulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx					Grand Total	6	18

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: WASHINGTON COUNTY				Homogenous Black pcts. ? (1=yes)	Unopposed =1	Contested =1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments		
WASHINGTON COUNTY - 2007					1	
District Attorney 04: Richardson	Black	Won	Unopposed		1	
Chancery Clerk: Hansell	Black	Won	Unopposed		1	
Circuit Clerk: Esters-Parker	Black	Won	Unopposed		1	
Coroner: Johnson	Black	Won	Contested			1
County Attorney: Hawkins	Black	Won	Contested			1
Sheriff: Gaston	Black	Won	Unopposed		1	
Tax Assessor: Seard	Black	Won	Unopposed		1	
Tax Collector: Lee	Black	Won	Unopposed		1	
Supervisor Dist. 3: Rankins	Black	Won	Unopposed		1	
Supervisor Dist. 4: Amos	Black	Won	Unopposed		1	
Justice Ct. Judge JC1: Carter	Black	Won	Unopposed		1	
Justice Ct. Judge JC2: Young	Black	Won	Unopposed		1	
Justice Ct. Judge JC3: Bush	Black	Won	Unopposed			
Constable JC-1: Watkins	Black	Won	Unopposed		1	
Constable JC-2: Anderson	Black	Won	Unopposed		1	
Summary (Washington 2007): 15 Black/Black-preferred candidates elected, 2 of them in contested elections.					12	2
WASHINGTON COUNTY - 2011					1	
District Attorney 04: Richardson	Black	Won	Unopposed		1	
Chancery Clerk: Hansell	Black	Won	Contested			1
Circuit Clerk: Esters-Parker	Black	Won	Unopposed		1	
Coroner: Johnson	Black	Won	Unopposed		1	
County Attorney: Hawkins	Black	Won	Unopposed		1	
Sheriff: Gaston, Sr.	Black	Won	Contested			1
Tax Assessor: Seard	Black	Won	Unopposed		1	
Tax Collector: Lee	Black	Won	Unopposed		1	
Supervisor Dist. 3: Wesley	Black	Won	Unopposed		1	
Supervisor Dist. 4: Amos	Black	Won	Contested			1
Justice Ct. Judge JC1: Carter	Black	Won	Unopposed		1	
Justice Ct. Judge JC2: Simpson	Black	Won	Unopposed		1	
Justice Ct. Judge JC3: Bush	Black	Won	Contested			1
Constable JC-1: Watkins	Black	Won	Unopposed		1	
Constable JC-2: Anderson	Black	Won	Contested			1
Summary (Washington 2011): 15 Black/Black-preferred candidates elected, 5 of them in contested elections.					10	5
WASHINGTON COUNTY - 2015						
Chancery Clerk: Hansell	Black	Won	Unopposed		1	
Circuit Clerk: Esters-Parker	Black	Won	Unopposed		1	
Coroner: Johnson	Black	Won	Contested			1
County Attorney: Hawkins	Black	Won	Unopposed		1	
Sheriff: Gaston, Sr.	Black	Won	Contested			1
Tax Assessor: Seard	Black	Won	Unopposed		1	
Tax Collector: Lee	Black	Won	Unopposed		1	
Supervisor Dist. 1: Johnson	Black	Lost	Contested			1
Supervisor Dist. 2: Benson III	Black	Won	Contested			1
Supervisor Dist. 3: McGee	Black	Won	Unopposed		1	
Supervisor Dist. 4: Amos	Black	Won	Contested			1
Supervisor Dist. 5: Redmond	Black	Won	Contested			1
Justice Ct. Judge JC1: Carter	Black	Won	Unopposed		1	
Justice Ct. Judge JC2: Simpson	Black	Won	Unopposed		1	
Justice Ct. Judge JC3: Bush	Black	Won	Unopposed		1	
Constable 1: Watkins	Black	Won	Contested			1
Constable 3: Walker	Black	Won	Unopposed		1	
Summary (Washington 2015): 17 Black/Black-preferred candidates elected, 7 of them in contested elections.					10	7
Source: Official Recapitulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx				Grand Total	32	14

BLACK FAVORED CANDIDATES FOR LOCAL OFFICE: YAZOO COUNTY					Homo- genous Black pcts.? (1=yes)	Unopposed =1	Contested =1
Office Sought & Candidate's Name	Race	Won/ Lost	Contested or Unopposed	Comments			
YAZOO COUNTY - 2007					1		
<i>Supervisor Dist. 3: Wright</i>	Black	Won	Contested				1
<i>Supervisor Dist. 5: Collins</i>	Black	Won	Contested				1
<i>Summary (Yazoo 2007): 2 Black/Black-preferred candidates elected, both in contested elections.</i>					Total:	0	2
YAZOO COUNTY - 2011							
<i>District Attny D21: Oliver</i>	Black	Won	Contested				1
<i>Chancery Clerk: Carver</i>	White	Won	Contested	Carver is Black-preferred candidate (based upon 3 homogeneous Black pcts.)			1
<i>Circuit Clerk: Coleman</i>	Black	Won	Unopposed		1		
<i>Justice Court Judge: Neely</i>	Black	Won	Contested	Neely is Black-preferred candidate (based upon 3 homogeneous Black pcts.)			1
<i>Sheriff: Sheriff</i>	Black	Won	Contested				1
<i>Constable Northern: Smith</i>	White	Won	Contested	Not Black-preferred candidate (based upon 3 homogeneous Black pcts.)			1
<i>Supervisor Dist. 3: Wright</i>	Black	Won	Unopposed		1		
<i>Supervisor Dist. 4: Dew</i>	White	Won	Contested	No homogeneous precincts for identifying preferred candidate			1
<i>Supervisor Dist. 5: Collins</i>	Black	Won	Unopposed		1		
<i>Summary (Yazoo 2011): 7 Black/Black-preferred candidates elected, 4 of them in contested elections.</i>					Total:	3	6
YAZOO COUNTY - 2015							
<i>District Attny D21: Oliver</i>	Black	Won	Unopposed		1		
<i>Chancery Ct. Judge: Jones</i>	Black	Lost	Contested	Walker (White winner) is NOT Black-preferred candidate as in 2011			1
<i>Circuit Clerk: Coleman</i>	Black	Won	Unopposed		1		
<i>Justice Ct. Judge S.: Neely</i>	Black	Lost	Contested	Neely is Black-preferred candidate (based upon 3 homogeneous Black pcts.)			1
<i>Sheriff: Sheriff</i>	Black	Won	Contested				1
<i>Constable N.: Peterson</i>	Black	Won	Unopposed		1		
<i>Constable S.: Starling</i>	Black	Won	Unopposed		1		
<i>Supervisor Dist. 3: Wright</i>	Black	Won	Unopposed		1		
<i>Supervisor Dist. 5: Collins</i>	Black	Won	Unopposed		1		
<i>Summary (Yazoo 2015): 7 of 8 Black/Black-preferred candidates elected, 2 of them in contested elections.</i>					Total:	6	3
Source: Official Recapitulations of Mississippi County general elections, accessed at www.sos.ms.gov/Elections-Voting/Pages/Election-Results-By-Year.aspx					Grand Total	9	11

APPENDIX TABLE 2

[under preparation]

45751015.v1

EXHIBIT 8

08/20/2012

Mr. Chris Herron
Chief, Voting-Civil Rights Division
U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenues, N W
Washington, D C 20530

Dear Mr. Herron,

This letter is a request for the Department of Justice to look hard at the Mississippi Senate Redistricting plan. This plan has violated section 5 and 2 of the Voting Right Bill. Please take a look at District 21, 22, 34, City of Yazoo MS, and the overall plan that reduce blacks voting strength.

Fact:

Mississippi has over 37% black population with a large percentage being in the Mississippi Delta. District 21 was moved out of Yazoo City which was the beginning of the Mississippi Delta. Yazoo City was in District 21 which had a 66.02% 18+BLK. Now the new State Plan reduces Yazoo City to a 50.77, which will not allow us to elect a black. District 22 is 50.77% black. This district consists of all black towns and cities in the Mississippi Delta. This includes Hollandale, Belzoni, Louise, Isola, Rolling folk, Yazoo City and many other smaller towns. Most of these cities and towns are over 80 to 90% Black. Example- Yazoo City's population is around 11,000-85% black with a black Mayor and four out of five black Aldermen.

Mississippi's plan says District 22 is one of the 15 black senate Districts. They failed to tell that it is a Federal Prison in Yazoo City with a population way over 2000 inmates. These inmates cannot vote and will make this district fall below 50% black. The Senator in this District is white and lives in Hollandale a majority black city and no black has been able to win in this district. The reason is they all way go out of the community of common interest to fine white voters when they have enough black voters in these cities and towns. District 22 denies black voters by going over 80 miles from a white Senator's hometown, a rural community to an urban community in Madison County- (Gluckstadt MS) - nine miles from Jackson, Mississippi the State Capital. This area is an upscale white community, with no common interest to the very poor Mississippi Delta.

Finally, the State Plan clearly reduces over 17 impact districts with 30 to 40% black population. These districts were doing well and had influences with numbers.

Once again please do not approve Mississippi's plan.

Sincerely,


Joseph C. Thomas

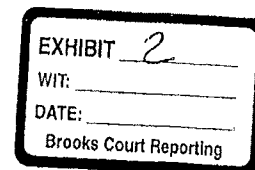


EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JOSEPH THOMAS; VERNON AYERS;
and MELVIN LAWSON;

Plaintiffs,

v.

PHIL BRYANT, Governor of the State of
Mississippi; DELBERT HOSEMANN,
Secretary of State of the State of Mississippi;
and JIM HOOD, Attorney General of
of the State of Mississippi, all in the official
capacities of their own offices and in their
official capacities as members of the State
Board of Election Commissioners,

Defendants.

Civil Action
No. 3:18cv441-CWR-FKB

FIRST AMENDED COMPLAINT

I. INTRODUCTION

1. This is a challenge under Section 2 of the Voting Rights Act, 52 U.S.C. § 10301 (“Section 2”), to the boundary lines of Mississippi State Senate District 22, which dilute African-American voting strength and deprive African-American voters of an equal opportunity to elect candidates of their choice. That district was utilized in the 2015 legislative elections and will be used again in the 2019 legislative elections unless enjoined by this Court. Absent such an injunction, the violation of Section 2 of the Voting Rights Act will be perpetuated until the subsequent election in 2023. The district can easily be redrawn to cure the Section 2 violation by modifying it and one or two adjacent districts. The Plaintiffs seek declaratory and injunctive

relief so that the 2019 election from State Senate District 22 can be held from a plan that complies with the Voting Rights Act.

II. THE PARTIES

The Plaintiffs

2. Plaintiff Joseph Thomas is an African-American resident and registered voter of Yazoo County. He resides and votes in Mississippi Senate District 22. He was a candidate in 2015 in the general election for Mississippi Senate District 22. He was supported by the vast majority of African-American voters but nevertheless was defeated by the white candidate as a result of white bloc voting against him. Because of the violation of Section 2 of the Voting Rights Act alleged in this complaint, he and other African-American voters in the district do not have an equal opportunity to elect candidates of their choice.

3. Plaintiff Vernon Ayers is an African-American resident and registered voter of Washington County. He resides and votes in Mississippi Senate District 22. Because of the violation of Section 2 of the Voting Rights Act alleged in this complaint, he and other African-American voters in the district do not have an equal opportunity to elect candidates of their choice.

4. Plaintiff Melvin Lawson is an African-American resident and registered voter of Bolivar County. He resides and votes in Mississippi Senate District 22. Because of the violation of Section 2 of the Voting Rights Act alleged in this complaint, he and other African-American voters in the district do not have an equal opportunity to elect candidates of their choice.

The Defendants

5. Defendant PHIL BRYANT is the Governor of the State of Mississippi and is sued in his official capacity. The Governor is the State's chief executive officer. MISS. CONST. art. 5, § 116.

6. Defendant DELBERT HOSEMAN is the Secretary of State of the State of Mississippi and is sued in his official capacity. The Secretary of State is the State's chief election officer and is responsible for administering elections in the State of Mississippi. MISS. CODE ANN. § 23-15-211.1.

7. Defendant JIM HOOD is the Attorney General of the State of Mississippi and is sued in his official capacity. The Attorney General is the State's chief law enforcement officer.

8. The Governor, the Secretary of State, and the Attorney General comprise the State Board of Election Commissioners of the State of Mississippi. MISS. CODE ANN. § 23-15-211. As such, they are responsible for implementing and enforcing Mississippi's election laws.

III. JURISDICTION

9. This Court has jurisdiction of this action pursuant to (1) 28 U.S.C. § 1343(a), because this action seeks to redress the deprivation, under color of state law, of rights, privileges and immunities secured by the Voting Rights Act; and (2) 28 U.S.C. § 1331, because this action arises under the laws of the United States.

10. This Court has jurisdiction to grant both declaratory and injunctive relief, pursuant to 28 U.S.C. §§ 2201 and 2202.

11. This Court has personal jurisdiction over the Defendants, all of whom are citizens of the State of Mississippi.

12. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district.

IV. FACTS AND BACKGROUND

13. Section 2 of the Voting Rights Act, 52 U.S.C. § 10301(a), prohibits any “standard, practice, or procedure” that “results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color.” A violation of Section 2 is established if it is shown that “the political processes leading to nomination or election” in the jurisdiction “are not equally open to participation by [a minority] in that its members have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.” *Id.* at § 10301(b). An electoral regime that dilutes the voting strength of a minority community deprives the members of that community of their right to an equal opportunity to elect representatives of their choice within the meaning of Section 2.

14. The State of Mississippi is at least 35% African-American in voting age population. However, only 25% of the members of the Mississippi Senate --- 13 of 52 --- are African-American.

15. In one of the State Senate districts, District 22, African-American voters have been unable to elect candidates of their choice because of white bloc voting. African Americans make up a very slim majority of the voting age population (50.8 percent) of District 22, but it is what the Supreme Court has called a “majority [that] lack[s] real electoral opportunity.” *LULAC v. Perry*, 548 U.S. 399, 428 (2006). The lack of opportunity is the result of white bloc voting and lower African-American turnout that are vestiges of the historical discrimination and extreme socio-economic disparities that have been inflicted upon African-Americans over a long period of time.

District 22 Geography and Demographics

16. Senate District 22 is located in the western part of the state and stretches across parts of six counties: Bolivar, Humphreys, Madison, Sharkey, Washington, and Yazoo. Only Sharkey County is entirely in District 22.

17. The district is one of largest in the state: it stretches over 100 miles from northwest to southeast, from the heart of the Mississippi Delta to Madison County's northern suburbs of Jackson. Only one other Senate district is longer (the 38th district).

18. District 22 both contains some very poor African-American areas, but also some very wealthy white areas in the southern portion of Madison County. The addition of those predominantly white areas from Madison County helps to limit the district's black voting age population to the present level of 50.8%, which combines with white bloc voting and lower African-American turnout to dilute African-American voting strength in the district.

Mississippi's Legislative Elections

19. The Mississippi Legislature is a bicameral legislature, made up of a 52-member Senate and a 122-member House of Representatives. The legislators serve four-year terms.

20. There is a majority vote requirement for Mississippi's primary elections. Miss. Code Ann. § 23-15-305. If no candidate receives a majority of the vote, then the State holds a runoff election between the top two candidates. *Id.*

21. The candidate who receives the most votes wins general elections. Miss. Code Ann. § 23-15-605.

22. Mississippi's elections for most state and county offices occur every four years in odd numbered years. The most recent Senate election was in 2015 and the next election is in 2019. The current redistricting plan for State Senate elections, including the plan for District 22, has only been used for one election (in 2015) and is scheduled to be used in one more (in 2019).

Voting Patterns

23. A white Republican, Eugene Clark, has represented the district for the past 15 years, having been elected four times. He has been elected each time as the result of white bloc voting while the vast majority of African-American voters has always supported his opponent. In these elections, African-American residents of District 22 consistently have lower participation rates than the District's white residents.

24. In 2003, Clark defeated the next top vote getter, Mala Brooks, a black Democrat, by 9,004 votes (55.7%) to 5,288 (32.7%), while a black independent, Mark Crawford, received 1870 votes (11.6%).

25. In 2007, Clark defeated Sandra Jaribu Hill, a black Democrat, by 7,266 votes (58.7%) to 5,116 (41.3%).

26. In 2011, Clark beat George Hollowell, a white Democrat, by 7,033 votes (53.9%) to 6,021 (46.1%).

27. In 2015, Clark beat Joseph Thomas, a black Democrat, by 8,149 votes (53.8%) to 6,985 (46.2%).

28. African-American voters in District 22 are politically cohesive, having voted overwhelmingly for a single candidate of choice over other candidates in recent elections.

29. Past elections in Mississippi, particularly in District 22 and its surrounding area, have been marked by a clear pattern of racially polarized voting. As demonstrated by the election results, the consistent patterns of bloc voting, and the turnout differentials, District 22 as currently configured does not give African-American voters an equal opportunity to elect candidates of their choice. Although African-American voters are politically cohesive, bloc

voting by white citizens in District 22 consistently defeats the candidates preferred by African-Americans in these elections.

The Ability to Draw a Fair District

30. If District 22 had a significantly increased black voting age population, African-American voters would have an equal opportunity to elect candidates of their choice. The African-American population in District 22 and adjacent areas is such that District 22 could be redrawn with a black voting age population of approximately 60% rather than the existing 50.8%. Such a district could be redrawn with changes only to one or two adjacent districts so that the vast majority of Mississippi's senate redistricting plan would remain unaltered. The resulting districts would be more compact than the current redistricting plan. This alteration would cure the Section 2 violation in District 22, and it would not create Voting Rights Act violations in any other districts.

Totality of the Circumstances

31. There is a lengthy and documented history of voter discrimination against African-Americans in Mississippi. Federal Courts have long acknowledged this history and found that Mississippi has violated federal voting rights protections. E.g., *United States v. Mississippi*, 380 U.S. 128, 131-36 (1965) (detailing the history of racially discriminatory election practices in Mississippi); *Young v. Fordice*, 520 U.S. 273, 291 (1997) (finding that Mississippi violated Section 5 of the Voting Rights Act when the State altered its registration procedure without seeking preclearance); *Allen v. State Board of Elections*, 393 U.S. 544, 571 (1969) (holding that Mississippi violated Section 5 of the Voting Rights Act when it did not seek federal approval before enforcing a new election law); *Mississippi State Chapter, Operation PUSH, Inc. v. Mabus*, 932 F.2d 400, 402 (5th Cir. 1991) ("Mississippi has a long history of using voter

qualifications and registration procedures to impede black citizens' participation in the political process."); *Martin v. Allain*, 658 F. Supp. 1183, 1192 (S.D. Miss. 1987) ("Mississippi has a long history of official discrimination touching on the right of black citizens to vote and participate in the democratic process."); *Jordan v. Winter*, 604 F. Supp. 807, 811-12 (N.D. Miss. 1984) ("Mississippi's long history of de jure and de facto race discrimination is not contested.").

32. African-Americans in Mississippi and in District 22 generally bear the effects of discrimination in areas such as education, employment, and health, and generally lag behind white residents in those areas. The history of discrimination and these socioeconomic disparities have hindered their ability to participate in the political process, and African Americans participation is lower than white participation in District 22. Mississippi's elections for most state and local offices are held in odd-numbered non-presidential election years, which means turnout is much lower than in presidential election years.

33. Historically and up to the present day, racially polarized voting has infected elections throughout Mississippi, particularly when African-American candidates are running against white candidates.

34. No African-American candidate has ever been elected to statewide office in Mississippi in the Twentieth Century. African-Americans are under-represented in the Mississippi legislature compared to their proportion of the general population. Although the State is 35% African-American in voting age population, only 13 of 52 (25%) Mississippi state senators are African-American. No African-American has been elected to the Mississippi Senate from a majority white district except Eric Powell, who was elected from District 4 in 2007, but subsequently was defeated in 2011 when he ran as an incumbent and was defeated again when he ran for the same seat again in 2015. Otherwise, no African-American has been elected to the

Mississippi Senate in a district with an African-American voting age population of the level of District 22, which is 50.8% black. An African-American candidate was elected to the Mississippi Senate from District 34, which is 55.1%. All others presently serving are from districts at least 61% African-American.

V. VIOLATION

35. Plaintiffs repeat and re-allege each allegation contained in the foregoing paragraphs of this complaint.

36. As set forth in this complaint, African-American voters in District 22 are politically cohesive, and white bloc voting has prevented them from electing candidates of their choice. The district can easily be modified to give African-American voters an equal opportunity to elect candidates of their choice. This can occur with changes to only one or two adjacent districts, leaving the remainder of the Senate plan untouched.

37. The totality of the circumstances establishes that the current districting plan has the effect of denying African-American voters an equal opportunity to elect representatives of their choice, in violation of Section 2 of the Voting Rights Act, 52 U.S.C. § 10301.

38. One election was held under this plan in 2015. Unless enjoined by this Court, another will be held in 2019, thus perpetuating the Section 2 violation until 2023.

VI. PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs respectfully pray that the Court:

- a. Declare that the current districting plan violates Section 2 of the Voting Rights Act;
- b. Enjoin Defendants, their agents and successors in office, and all persons acting in concert with them, from administering, implementing, or conducting any future elections in Mississippi State Senate District 22 under the current districting plan;

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- c. Provide state officials with the opportunity to enact a new districting plan for District 22 that complies with Section 2 of the Voting Rights Act, 52 U.S.C. § 10301;
- d. Order the implementation of a new districting plan for District 22 that complies with Section 2 of the Voting Rights Act, 52 U.S.C. § 10301;
- e. Award Plaintiffs their reasonable attorneys' fees, pursuant to statute, and the costs and disbursements of maintaining this action; and,
- f. Order such additional relief as the interests of justice may require.

July 25, 2018

Respectfully submitted,

s/ Beth L. Orlansky
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PHV applications to be filed

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Robert B. McDuff, hereby certify that on July 25, 2018 I electronically filed a copy of the First Amended Complaint with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record.

Additionally, the foregoing was served by email and hand delivery on:

Harold Pizzetta
Office of the Attorney General
Sillers Building
550 High Street
Jackson, MS 39201

s/Robert B. McDuff

EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

On July 9, 2018, plaintiffs Joseph Thomas, Vernon Ayers, and Melvin Lawson filed this suit claiming that the boundaries of Mississippi Senate District 22 are drawn in violation of Section 2 of the Voting Rights Act. The new boundaries they propose would affect District 22 and two adjacent Districts.

On August 8, 2018, in their answer, defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann admitted that this Court has subject matter jurisdiction and can grant declaratory and injunctive relief. The parties proceeded to brief motions, exchange written discovery, designate experts, argue the defendants' dispositive motion,¹ take depositions, and prepare for a trial set to begin on February 6, 2019.

Now, days before trial, two of the defendants (Bryant and Hosemann) have brought in new lawyers to present a new defensive theory.² They contend that this suit challenges "the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body," which, if true, would require a three-judge court. 28 U.S.C. § 2284(a). Unless such a court is convened, they argue that the case must be dismissed for lack of subject matter jurisdiction.

¹ During oral argument, counsel never questioned whether this Court had jurisdiction to hear this claim. That hearing was held on January 16, 2019, eight days before the defendants filed the present motion.

² Hood's representative has joined in their motion.

Of course, the plaintiffs have not asserted any constitutional claims. The plaintiffs also do not seek to reapportion congressional districts or a statewide legislative body.

The defendants nevertheless proceed with two lines of attack. They first argue that a Section 2 claim should be considered *like* a constitutional claim for the purpose of convening a three-judge court. In the alternative, they contend that the text and legislative history of § 2284(a) reveal that Congress wanted three-judge courts to be convened in cases like ours.³

Three-judge courts are “an exceptional procedure.” *Phillips v. United States*, 312 U.S. 246, 248 (1941). They are rare in part because Congress has been “mindful that the requirement of three judges . . . entails a serious drain upon the federal judicial system,” *id.* at 250, and in part because convening such a court “may often result in a delay in a matter needing swift initial adjudication,” *Allen v. State Bd. of Elections*, 393 U.S. 544, 561 (1969) (citation omitted). The Supreme Court has “long held that congressional enactments providing for the convening of three-judge courts must be strictly construed.” *Id.* (citing *Phillips*, 312 U.S. at 246).

Having considered the defendants’ arguments and authorities against this standard, the Court finds that a three-judge court is not required in this case.

First, there is no justification for treating Section 2 and constitutional claims as identical. They are different causes of action with different evidentiary requirements. *See League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425, 442 (2006). As Chief Judge Bowdre recently concluded in a similar case, a “challenge only under Section 2 . . . is not a constitutional

³ Part of the defendants’ argument turns on speculation about what a single U.S. Senator “would have” wanted to happen in these cases. Docket No. 45 at 5. As Justice Scalia and Bryan A. Garner explain, however, “[t]he search for what the legislature ‘would have wanted’ is invariably either a deception or a delusion.” *Reading Law: The Interpretation of Legal Texts* 95 (2012). “What the legislature ‘would have wanted’ it did not provide, and that is an end of the matter.” *Id.* at 94.

challenge” and does not require a three-judge court. *Chestnut v. Merrill*, --- F. Supp. 3d ---, 2019 WL 338909, at *5 (N.D. Ala. Jan. 28, 2019).⁴

As “master of the complaint,” it is the plaintiff’s choice to bring or forego a constitutional claim. *Holmes Grp., Inc. v. Vornado Air Circulation Sys., Inc.*, 535 U.S. 826, 831 (quotation marks and citation omitted). In this case, the plaintiffs have elected not to pursue one. Neither the defendants nor the Court can force them to change their minds. *See Fortune v. XFit Brands, Inc.*, No. 3:18-CV-545-CWR-LRA, 2018 WL 6332640, at *3 (S.D. Miss. Dec. 4, 2018) (“If the plaintiff’s decisions were so easily invalidated, so easily written off by the court or her opponent, she should not bother to file a complaint.”).

Second, the defendants argue that § 2284(a) requires a three-judge court to hear *any* cause of action which seeks to redraw a portion of a statewide legislative body. In other words, they claim that Congress intended standalone Section 2 claims to be heard by a three-judge court.

The defendants are incorrect. The plain language of the statute requires a three-judge court when plaintiffs challenge “*the constitutionality of* the apportionment of congressional districts or the apportionment of any statewide legislative body.” 28 U.S.C. § 2284(a) (emphasis added). The term “the constitutionality of” modifies all of the phrases which follow it, per the series-qualifier canon of construction.⁵ *See* Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* 147 (2012).

That is hardly the end of this exercise in textualism, however. The Supreme Court has cautioned that “there are two opposing canons on almost every point.” *Lockhart v. United States*,

⁴ The new lawyers explained that similar arguments had been presented to the judge in *Chestnut*, and stated that the defendants “now join the election officials of our neighboring States in seeking enforcement of § 2284(a).” Docket No. 45 at 2. Days later Chief Judge Bowdre rejected those arguments.

⁵ Despite its “fancy name,” the series-qualifier canon “reflects the completely ordinary way that people speak and listen, write and read.” *Lockhart v. United States*, 136 S. Ct. 958, 970 (2016) (Kagan, J., dissenting).

136 S. Ct. 958, 968 (2016) (quoting Karl N. Llewellyn, *Remarks on the Theory of Appellate Decision and the Rules or Canons About How Statutes Are To Be Construed*, 3 Vand. L. Rev. 395, 401 (1950)). Today's case is no different.

The defendants contend that the series-qualifier canon results in needless words, in violation of the surplusage canon. *See* Scalia & Garner at 174. It is a fair point. If “the constitutionality of” is indeed carried over to all following phrases, the second use of “the apportionment of” is rendered unnecessary. The statute would be more precise without repeating “the apportionment of.”

The Supreme Court nevertheless urges vigilance with the surplusage canon. “Our hesitancy to construe statutes to render language superfluous does not require us to avoid surplusage at all costs. It is appropriate to tolerate a degree of surplusage.” *Lockhart*, 136 S. Ct. at 966 (quotation marks, citation, and brackets omitted). The leading treatise agrees: “Sometimes drafters *do* repeat themselves and *do* include words that add nothing of substance, either out of a flawed sense of style⁶ or to engage in the ill-conceived but lamentably common belt-and-suspenders approach.” Scalia & Garner at 176-77. Justice Scalia and Mr. Garner warn that “a clever interpreter could create unforeseen meanings or legal effects from this stylistic mannerism.” *Id.* at 177.

The defendants' argument *is* very clever. Without admitting as much, the defendants ask the Court to rewrite § 2284(a) and transform it into this: *a three-judge court is required when plaintiffs challenge the apportionment of any statewide legislative body or the constitutionality of the apportionment of congressional districts*. Unfortunately for them, that is not what Congress wrote and this Court cannot rewrite the statute to suit their needs. “Allowing laws to be rewritten

⁶ *Cf. King v. Burwell*, 135 S. Ct. 2480, 2501 (2015) (“Pure applesauce.”) (Scalia, J., dissenting).

by judges is a radical departure from our democratic system.” *Id.* at 83. “So this court will apply the law before it and will not read new provisions into—or strike existing words from—the statutes at issue.” *Chestnut*, 2019 WL 338909, at *5.

Finally, this Court’s conclusion is buttressed by several other decisions reading § 2284(a) the same way. *E.g.*, *Rural W. Tenn. African-Am. Affairs Council v. Sundquist*, 209 F.3d 835, 838 (6th Cir. 2000) (“RWTAAAC then amended its complaint to challenge the House Plan on the sole ground that it violated § 2 of the Voting Rights Act. Because the amended complaint contained no constitutional claims, the three-judge court disbanded itself.”); *Page v. Bartels*, 248 F.3d 175, 189 (3d Cir. 2001), *as amended* (June 25, 2001) (finding that § 2284(a) “only requires a three-judge district court for certain constitutionally-based apportionment challenges”); *Kidd v. Cox*, No. 1:06-CV-997-BBM, 2006 WL 1341302, at *4 (N.D. Ga. May 16, 2006) (“In pertinent part, § 2284(a) requires that a three-judge court be convened ‘when an action is filed challenging the constitutionality of . . . the apportionment of any statewide legislative body.’”) (ellipses in original). This Court sees no reason to deviate from these authorities.

The motion is denied.

SO ORDERED, this the 5th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

The plaintiffs in this case allege that the boundaries of Mississippi Senate District 22 violate § 2 of the Voting Rights Act. A trial on this claim was held on February 6 and 7, 2019. The Court anticipates issuing a full memorandum opinion next week.

The purpose of this Order is to advise the Mississippi Legislature that the evidence supports the plaintiffs' allegations. As presently drawn, District 22 does not afford the plaintiffs "an equal opportunity to participate in the political processes and to elect candidates of their choice." *Thornburg v. Gingles*, 478 U.S. 30, 44 (1986) (quotation marks and citation omitted).

The plaintiffs have put forward three alternate Plans that would remedy the § 2 violation, comply with Supreme Court precedent, and satisfy traditional redistricting criteria. Plans 1 and 2 would affect only Districts 22 and 23. Plan 3 would affect Districts 22, 23, and 13.

The Legislature is entitled to the first opportunity to redraw District 22, and, if it chooses, extend the March 1 qualification deadline for candidates in the affected Districts. *See League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 416 (2006). As Judge Jolly wrote in a congressional redistricting case, "[a]lthough it may be difficult for the Legislature to adopt a plan," a "legislative plan is unequivocally to be preferred over a court-ordered plan Without commenting on the ultimate role of the federal courts should the Legislature act, we encourage

the Legislature to act.” *Smith v. Clark*, 189 F. Supp. 2d 503, 511–12 (S.D. Miss. 2002) (three-judge court).

To the extent the defendants’ attorneys have not already done so, now would be an appropriate time to see if a political solution can be put into place.

SO ORDERED, this the 13th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 12

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

MEMORANDUM OPINION AND ORDER

In July 2018, plaintiffs Joseph Thomas, Vernon Ayers, and Melvin Lawson filed this suit alleging that the boundaries of Mississippi Senate District 22 violate § 2 of the Voting Rights Act. Defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann deny the allegation and dispute that any violation can be remedied in time for the 2019 election. The parties presented evidence at trial on February 6 and 7, 2019.¹

On February 13, after a thorough review of the evidence and arguments, the Court advised the parties and the Mississippi Legislature that the plaintiffs had proven their case. The Legislature was invited to redraw District 22 prior to consideration of any judicial remedy. The Court's findings of fact and conclusions of law are presented below.

I. Factual and Procedural History

A. The Parties

Plaintiff Joseph Thomas is a native of Yazoo City, Mississippi. He is a banker by profession, a community advocate by avocation, and in his spare time, a published historian of African-Americans in Yazoo City and Mississippi.²

¹ Discovery was completed on an expedited basis. *See* Docket No. 28. The trial was held at the first opportunity after accounting for the attorneys' conflicts and the Court's firm trial settings. At the hearing on the defendants' dispositive motion, defense counsel recognized that all have worked as expeditiously as possible.

² *See* Joseph C. Thomas, *Afro-American Sons & Daughters 1849-1949* (1997).

In 2003, Thomas turned his attention to public office. He ran for and won election as Mississippi State Senator for District 21. The District included Thomas's part of Yazoo County and predominantly African-American portions of Madison County, among other places, so its "Black Voting Age Population" (BVAP) was relatively high. He ran again in 2007 but lost in the primary to another African-American candidate. Thomas then sat out the 2011 cycle.

The decennial redistricting process resulted in changes to the Senate map in 2012. Thomas's residence wound up in District 22.

Thomas learned that District 22 now extended into areas of Madison and Bolivar Counties that ultimately led it to have a BVAP of only 50.8%. He was concerned that although technically a majority, such a low BVAP would negatively impact African-Americans' ability to elect their candidate of choice. After all, in District 22, African-Americans' candidate of choice had lost in the 2003, 2007, and 2011 elections.

Thomas contacted the U.S. Department of Justice and urged it to reject the new boundaries. He was not successful. DOJ precleared the plan in September 2012.

In 2015, Thomas decided to throw his hat in the ring. He ran in District 22 against Eugene "Buck" Clarke, the incumbent chairman of the Senate Appropriations Committee. Thomas thought it would be an uphill battle, but "ran hard" and spent "quite a bit" of his own money, he testified. He lost 54% to 46%. Thomas says he was "real disappointed" that his outreach to the majority-white precincts in Madison and Bolivar Counties had not garnered more votes.

Thomas did not file a Voting Rights Act lawsuit in 2015, 2016, or 2017. He testified that he was unaware that an individual could file a § 2 suit until he had a conversation with one of the attorneys in this case in summer 2018. This suit was filed several weeks later.

Plaintiff Melvin Lawson is also a voter in District 22. He has worked and volunteered for political campaigns, including his brother's campaign for Bolivar County Supervisor and Thomas's Senate campaign. Through this experience Lawson found that it is more difficult to get Delta voters to the polls in odd-numbered election years, *i.e.*, years without Congressional and Presidential races, because in odd-numbered years there are fewer transportation options available on Election Day.

In 2018, Lawson overheard concerned citizens talking about District 22. Weeks later he ran into attorney Ellis Turnage, co-counsel for the plaintiffs in this action, who told him about this suit. Lawson was interested and joined as a plaintiff.

We know little about plaintiff Vernon Ayers other than this: he is a registered voter in District 22. Neither side has elaborated on his situation.

Each plaintiff is African-American.

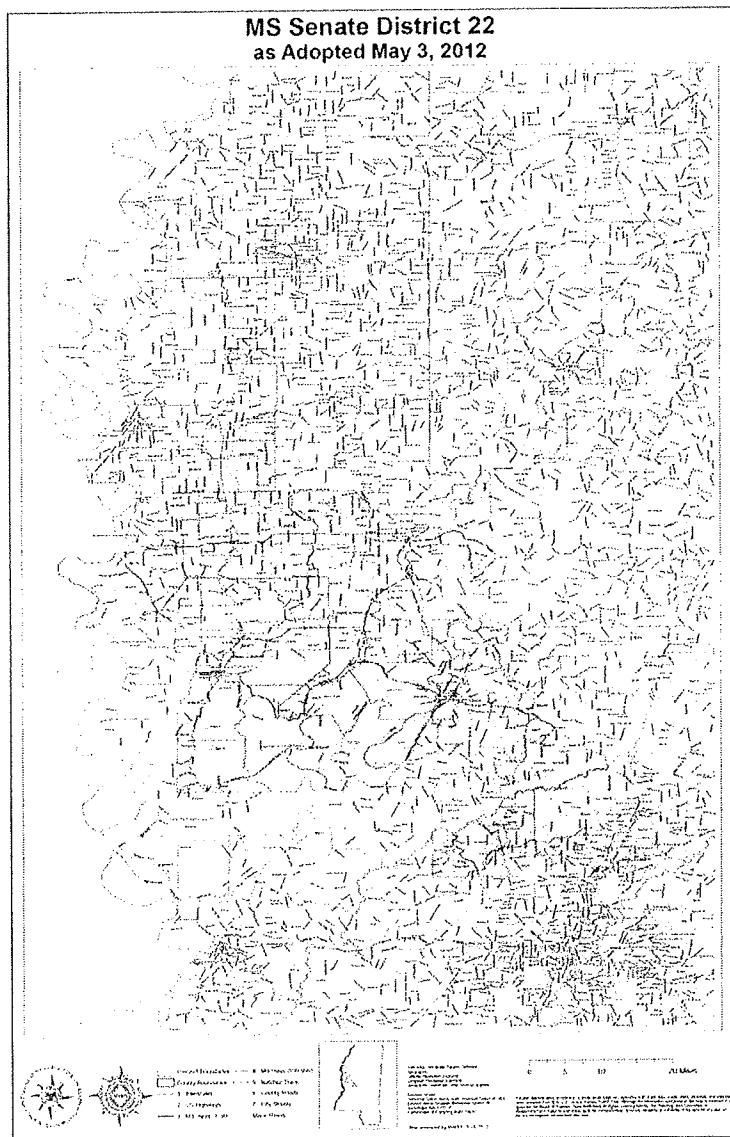
Defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann constitute the State Board of Election Commissioners.³ All three are sued in their official capacities.

B. District 22

District 22 is the second-largest Senate District in Mississippi, encompassing 2,166 square miles and spanning more than 100 miles from tip to toe. It begins in Bolivar County, runs through Washington, Humphreys, Sharkey, and Yazoo Counties, and finds its end in Madison County. The District looks like this:

³ See Miss. Code Ann. § 23-15-211.

SENATE DISTRICT 22



Most of District 22 lies in the heart of the Mississippi Delta, the unique alluvial plain occupying the northwest quadrant of the state. The Delta is impossible to completely define, but my colleagues' description from 1982 is a good start:

The Mississippi Delta consists of 19 Delta and part-Delta contiguous counties as follows: Bolivar, Carroll, Coahoma, DeSoto, Grenada, Holmes, Humphreys,

Issaquena, Leflore, Panola, Quitman, Sharkey, Sunflower, Tallahatchie, Tate, Tunica, Warren, Washington, and Yazoo. This is a distinct geographical area of the state traditionally featuring an agricultural economy concerned with flood control of the Mississippi River. The geography of the Delta has been colorfully and somewhat accurately described as “beginning in the lobby of the Peabody Hotel at Memphis, Tennessee, and ending at Catfish Row in Vicksburg, Mississippi.” Since early times, concentrations of blacks have resided in the Delta area.⁴

John Dittmer calls the Delta “both a clearly defined geographical area and a state of mind.”⁵ The benefits of “some of the richest soil in the nation” were shared unequally: the land was worked by “tens of thousands of poor black families” for the benefit of “a relatively small number of white[]” landowners.⁶ The Delta was “a place of appalling poverty for the blacks who tilled the land.”⁷

As Mississippi has changed over the years, it remains true that “[b]lacks in Mississippi, especially in its Delta region, generally have less education, lower incomes, and more menial occupations than whites.”⁸ Updated socio-economic data for District 22 will be discussed below.

The plaintiffs introduced evidence confirming that the Delta is “totally different” from Madison County. Lawson agreed that the differences are geographical and cultural. The Delta is rural, agrarian, and contains “the largest concentration of black voting age population” in Mississippi.⁹ Madison County is populous and suburban, bordering the State’s Capitol City, Jackson.

The Madison County precincts situated in District 22, such as the Gluckstadt area, are especially different. A prior redistricting court designated them as a “high-growth area” of the State.¹⁰ Cotton and soybeans are growing in the Delta. The population is not.

⁴ *Jordan v. Winter*, 541 F. Supp. 1135, 1139 n.1 (N.D. Miss. 1982) (three-judge court).

⁵ John Dittmer, *Local People: The Struggle for Civil Rights in Mississippi* 10 (1994).

⁶ *Id.*

⁷ Yasuhiro Katagiri, *The Mississippi State Sovereignty Commission: Civil Rights and States’ Rights* 39 (2001).

⁸ *Jordan v. Winter*, 604 F. Supp. 807, 812 (N.D. Miss. 1984) (three-judge court).

⁹ *Smith v. Clark*, 189 F. Supp. 2d 529, 543 (S.D. Miss. 2002) (three-judge court).

¹⁰ *Id.* at 544.

In the 2015 election, Thomas won the predominately African-American precincts in Washington, Sharkey, Humphreys, and Yazoo Counties. He lost the predominantly white precincts in Madison and Bolivar Counties.

C. The Experts

1. The Plaintiffs' Experts

The plaintiffs called two experts to testify at trial. Both were qualified by education and experience to give expert opinions in their respective fields, and have previously provided expert testimony in voting cases.

First to testify was Dr. Maxwell Palmer, a political scientist at Boston University. Dr. Palmer analyzed District 22's voting patterns with a technique called "ecological inference" (EI).

At heart, EI "is the process of extracting clues about individual behavior from information reported at the group or aggregate level."¹¹ It is useful in voting cases because "the secret ballot hinders the [research] process and surveys in racially polarized contexts are known to be of little value."¹² EI "estimates the underlying propensity of each group to turn out for an election and to vote for a particular candidate using the estimation technique of maximum likelihood."¹³ The process is generally accepted in voting cases in this Circuit.¹⁴

Dr. Palmer testified that EI is a superior statistical method to use in this case. He said that among other benefits, EI allowed him to run 100,000 simulations of each election in the sample, and provided valuable statistical checks, such as confidence intervals, on the results.

¹¹ Gary King et al., *Ecological Inference: New Methodological Strategies* 1 (2004).

¹² *Id.*

¹³ *Rodriguez v. Harris Cty., Tex.*, 964 F. Supp. 2d 686, 759 (S.D. Tex. 2013).

¹⁴ *E.g., Benavidez v. City of Irving, Tex.*, 638 F. Supp. 2d 709, 725, 731-32 (N.D. Tex. 2009); *Hall v. Louisiana*, 108 F. Supp. 3d 419, 433 (M.D. La. 2015) ("Experts from both Plaintiffs and Defendants employed the widely recognized Ecological Inference procedure developed by Dr. Gary King to derive their conclusions of voter preferences in this case.").

Dr. Palmer used precinct-level voting and Census data to analyze 10 elections in District 22. They consist of the 2003, 2007, and 2015 Senate District 22 elections (*i.e.*, the “endogenous” elections most relevant to this case), as well as the 2003 Lieutenant Governor and Treasurer elections, the 2007 Insurance Commissioner election, the 2011 Governor election, and the 2015 Agriculture Commissioner, Secretary of State, and Governor elections (*i.e.*, the “exogenous” elections with some relevance to this case).¹⁵ All 10 featured contests between white and black candidates. The goal of the endogenous/exogenous comparison was to see if findings were consistent between the Senate races and statewide races also held in odd years in District 22.

This analysis led Dr. Palmer to present the following conclusions:

First, there is “strong evidence” that African-American voters in District 22 are politically cohesive, but that their candidates of choice are defeated by white bloc voting. Every African-American candidate lost in the 10 elections in the sample, for example.¹⁶ Dr. Palmer also found that African-American and white voters in the District are highly racially polarized.¹⁷ In the 2015 State Senate race, 92.8% of African-American voters chose Thomas, while only 11.4% of white voters did the same.

Second, there is a sizable turnout gap between African-American and white voters in District 22.¹⁸ On average, white turnout is 10.2 percentage points higher than black turnout. This conclusion was statistically significant in three out of the four Senate District 22 races analyzed.

¹⁵ The 2011 Senate race in District 22 was between two white candidates. Dr. Palmer found that 83% of African-American voters supported the Democrat and 84% of white voters supported the Republican. The Democrat lost.

¹⁶ Among the endogenous elections, Thomas’s 46% result in 2015 made him the highest-performing African-American candidate. Looking at the exogenous elections, Gary Anderson was the most popular African-American candidate in District 22; he earned 49.1% of the District’s vote in the 2003 Treasurer race and 49% of the District’s vote in the 2007 Insurance Commissioner election.

¹⁷ This finding is statistically significant.

¹⁸ The turnout analysis included the 2011 Senate District 22 election.

Third, African-Americans would have a “realistic opportunity” to elect their candidate of choice if the BVAP in District 22 was increased to 62%.

On cross-examination it became clear that the plaintiffs did not ask Dr. Palmer to determine whether a BVAP lower than 62% would be sufficient to elect the African-American community’s candidate of choice; rather, the plaintiffs asked him to analyze the expected outcome of a 62% BVAP. Dr. Palmer’s report states that the 62% threshold was derived from the map constructed by the plaintiffs’ expert mapmaker. We turn now to that expert.

William Cooper was the plaintiffs’ second and final expert witness. Cooper uses geographic information system (GIS) technology to create electoral maps.

In this case, the plaintiffs asked Cooper to determine whether District 22’s boundaries could be reconfigured to increase the BVAP while honoring traditional redistricting criteria and minimizing disruption to adjacent Districts. The plaintiffs also asked Cooper to gather relevant socio-economic data for District 22.

Cooper concluded that yes, although African-American voters in District 22 are already sufficiently numerous and geographically compact as to constitute a majority, the District could be redrawn to increase the BVAP by at least 10 additional percentage points. He then prepared three maps demonstrating how District 22 could be reconfigured.

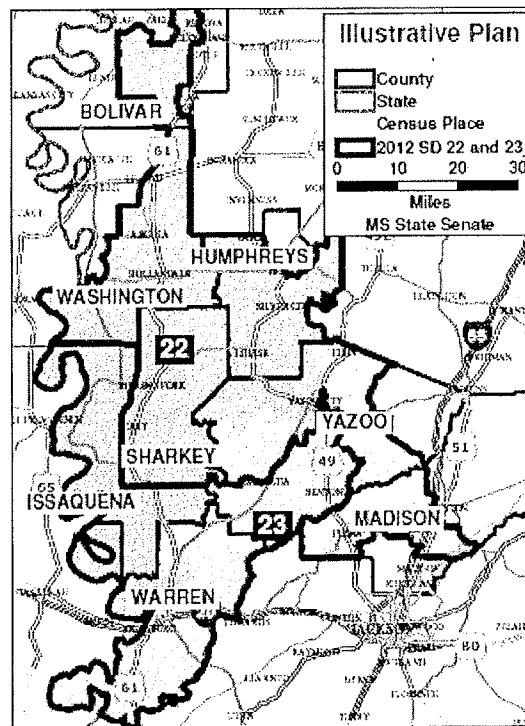
Plan 1 moves the Madison County precincts and eight Yazoo County precincts from District 22 to District 23. In exchange, the Issaquena County precincts and eight Warren County precincts would move in the opposite direction. A total of 28 out of Mississippi’s 1,962 precincts (1.4%) would be shifted. No precinct lines would be redrawn. Approximately 70% of the population of District 22 would remain in District 22, while approximately 67% of the

population of District 23 would stay put. A total of 27,000 voters in these Districts would be affected.

Under Plan 1, the BVAP would rise to 61.98%.

Plan 1 is pasted below. The thick blue lines represent the Districts as currently constituted. The gold and pink areas show how the Districts would change.

PLAINTIFFS' ILLUSTRATIVE PLAN 1



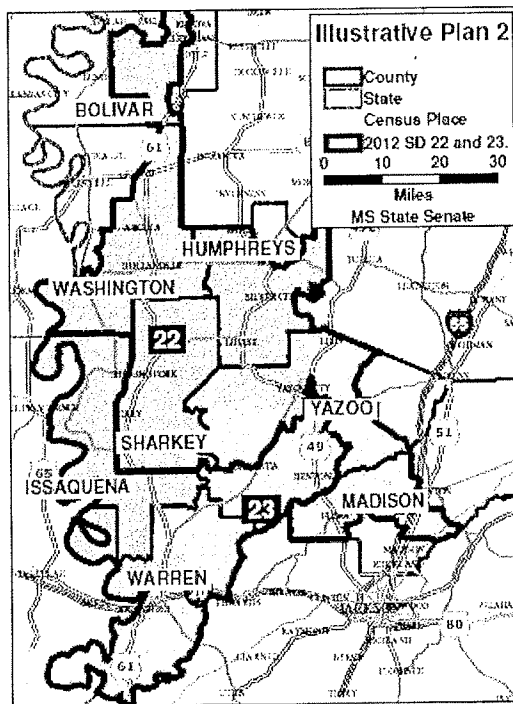
Cooper developed Plans 2 and 3 in response to the defendants' arguments during discovery. The defendants' expert had contended (among other things) that Plan 1 was unwieldy because it would split the City of Vicksburg between Districts 22 and 23. So in Plan 2, Cooper proposed another way to redraw those Districts that, while achieving the goals of Plan 1, would offset the splitting of Vicksburg by reuniting all of Yazoo City into a single District. Plan 2 ends up with a BVAP of 61.3%.

Plan 3 takes that idea one step further. While Vicksburg would again be split, Plan 3 redraws the boundaries to reunite Yazoo City *and* Cleveland, Mississippi—both of which are currently divided—resulting in a net decrease in split cities. The resulting BVAP is 66.1%.

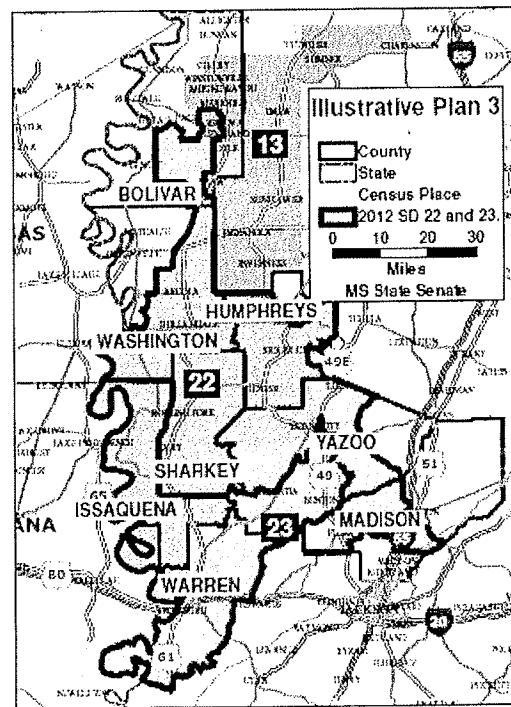
The downside of Plan 3 is that it also involves adjusting the borders of District 13, thereby affecting more counties, precincts, and voters. It essentially presents a trade-off between municipal unification and pre-election disruption.

Plans 2 and 3 are shown below. Again, the thick blue lines represent the Districts as currently constituted, while the gold, pink, and in Plan 3, green areas indicate how the Districts would change.

PLAINTIFFS' ILLUSTRATIVE PLAN 2¹⁹



PLAINTIFFS' ILLUSTRATIVE PLAN 3



¹⁹ At this scale Plans 1 and 2 may look identical, but Plan 2 features a small golden-colored section immediately to the left of the word "YAZOO."

All of Cooper's illustrative plans satisfy traditional redistricting criteria. They are contiguous, reasonably compact, reasonably shaped, satisfy one-person one-vote, and do not dilute minority voting strength. The incumbent Senator in District 23 remains in the same District. (The incumbent in District 22, Buck Clarke, is not running for reelection although his residence remains in the District.)

"To the extent possible, consistent with the constitutional and statutory requirements, federal redistricting courts attempt to preserve local political boundaries—city and county lines," since those lines often reflect "communities of interest."²⁰

In addition to the communities of interest represented by counties and municipalities, there are other communities of interest which share common concerns with respect to one or more identifiable features such as geography, demography, ethnicity, culture, socio-economic status or trade. The preservation of regional communities of interest within a single district enhances the ability of constituents with similar regional interests to obtain effective representation of those interests.²¹

Cooper testified that Plan 1 better respects communities of interest than the current map. Issaquena County and part of Warren County are more like the other Counties in District 22, he said, while the Madison County precincts are closer in nature to the wealthier parts of Warren County already sited in District 23.

Finally, Cooper reviewed Census data showing a variety of substantial socio-economic disparities between African-Americans and whites in District 22 that likely reduce voter turnout.

The statistics are bleak. The African-American poverty rate in District 22 is nearly five times the white poverty rate. Educational attainment for African-Americans is depressingly low. African-Americans who work full time make a *median* wage of \$20,256 a year, while the median

²⁰ *Smith*, 189 F. Supp. 2d at 542 (citations omitted).

²¹ *Id.* at 543 (quotation marks, citations, and brackets omitted).

white full-time worker makes nearly double—\$40,485.²² These and similar disparities, some of which are reproduced below, reflect two populations that reside alongside each other yet experience vastly different opportunities and outcomes:

SOCIO-ECONOMIC PROFILE OF DISTRICT 22

	<i>African-Americans</i>	<i>Whites</i>
<i>Poverty Rate</i>	41.2%	8.8%
<i>Median Household Income</i>	\$23,741	\$66,736
<i>SNAP Participation</i>	40.3%	4.3%
<i>High School Dropout Rate</i>	28.7%	9.8%
<i>Bachelor's Degree Attainment</i>	14.0%	38.6%
<i>Median Full-time Wage</i>	\$20,256	\$40,485
<i>Adults Without Health Insurance</i>	29.1%	11.5%

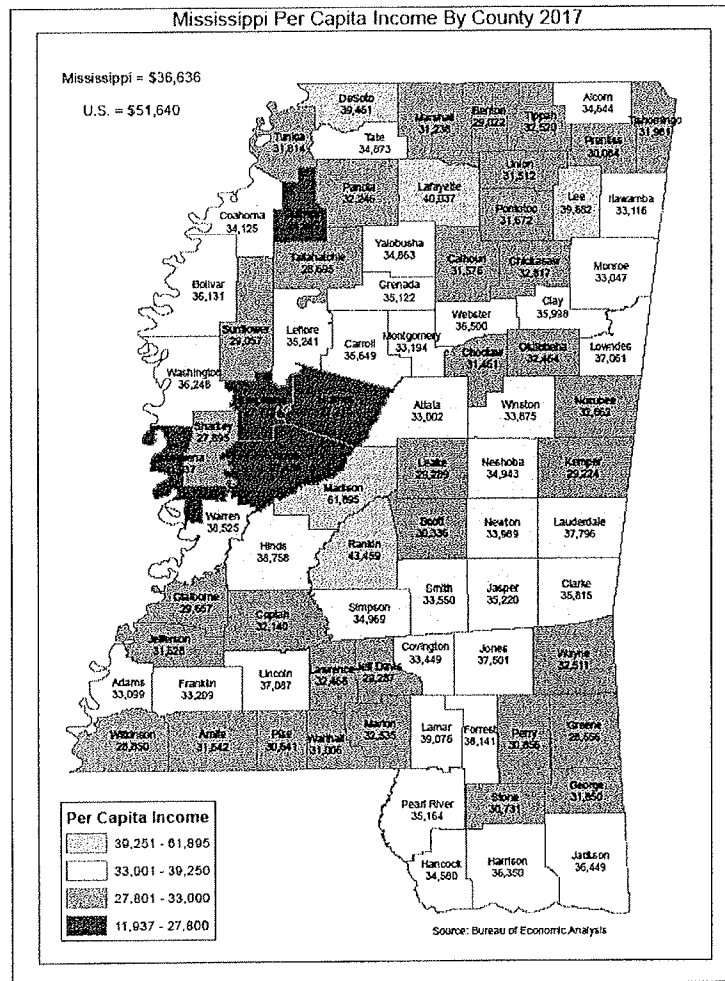
Cooper proceeded to explain that the inclusion of Madison County voters added significantly to these disparities. County-level statistics reveal that Madison County's median household income is more than twice as much as any other County in District 22.²³ In Madison County, for example, the median household brings in \$68,600 annually, a full \$40,000 more than the median household in neighboring Yazoo County (\$28,330). After Madison County, the second-wealthiest County in the District is Sharkey County, with a \$30,033 median household income. Obviously, that is less than half of Madison County's figure.

The Mississippi Department of Employment Security has created a helpful map demonstrating county-level income differences as they existed in 2017. It shows that Madison County had the highest per-capita income that year in all of Mississippi:

²² This means that half of working African-Americans in District 22 make below \$20,256 a year.

²³ The statistics for the Gluckstadt area may be higher than the countywide figures, but they are not in evidence.

PER CAPITA INCOME BY COUNTY



We now turn to the other side of this battle of the experts.

2. The Defendants' Expert

The defendants' sole expert was Dr. Peter A. Morrison, an applied demographer from Nantucket, Massachusetts. Dr. Morrison is retired from the RAND Corporation.

Dr. Morrison took a different approach to whether white bloc voting usually defeats African-American-preferred candidates. He did not look at the Senate District 22 elections, but instead compiled the results of local elections *within* the boundaries of District 22. From 2007-

onward, he found “152 separate instances in which a candidate favored by AA voters has been elected to local public office throughout the territory included in” District 22.

In Humphreys County, for example, Dr. Morrison examined the records of the 2007, 2011, and 2015 elections for local offices such as Chancery Clerk, Circuit Clerk, and Sheriff. From those records he identified a sample of 21 elections in which an African-American candidate ran and won. Of those, 14 races were uncontested and 7 were contested.

Dr. Morrison testified that based on this “simple counting operation—that’s what demographers do,” African-Americans are capable of winning elections within District 22. When asked about the possibility of white bloc voting defeating African-American-preferred candidates, he explained that he could not “see how that could possibly be the case” given the number of African-American elected officials. “The numbers speak for themselves.”

Dr. Morrison took issue with Plan 1. He argued that splitting Vicksburg would subordinate traditional redistricting criteria to race. Dr. Morrison also claimed that African-Americans in District 23 would be harmed because their “influential” 42% BVAP would be reduced to 31%. “Overall,” he wrote, “Plaintiffs’ proposed alternative [Plan 1] would strip African-American voters of two districts in which they are now influential.”

Finally, Dr. Morrison gathered Census data about voter turnout in Mississippi. Surveys from even-numbered election years spanning 2004-2016 show that African-Americans self-reported higher turnout rates than white voters. “These data furnish convincing evidence that African Americans in Mississippi have access to the political process and have participated in that process at ever higher rates in recent years,” Dr. Morrison concluded.

D. Stipulations

In case the Court's discussion has inadvertently omitted anything, the parties' stipulations are reproduced here in their entirety:

The Mississippi Senate is composed of 52 members, each of whom is elected from a single-member district. Elections for the Mississippi Legislature are held every four years in odd-numbered years at the same time other elections for most state and local elections are held.

The current plan for the Mississippi Senate was adopted in 2012.²⁴ The first election under it was held in 2015. The next election under it will be held in 2019. Under the current plan for the Mississippi Senate, District 22 consists of all of Sharkey County and parts of Bolivar, Washington, Humphreys, Yazoo, and Madison Counties. Under the current plan, District 22 is 50.77% African American in voting age population using 2010 census data.

Eugene "Buck" Clarke has represented Mississippi State Senate District 22 for approximately 15 years since January 2004. He is white.

In the 2003 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 9,004 votes and defeated African-American candidates Mala Brooks and Mark Crawford, who received 5,288 votes and 1,870 votes, respectively.

In the 2007 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 7,266 votes and defeated African-American candidate Sandra Jaribu Hill, who received 5,116 votes.

²⁴ At trial, the parties clarified that the Mississippi Senate adopted a plan in 2011, but it was not adopted by the Mississippi House and therefore never became final.

In the 2011 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 7,033 votes and defeated white candidate George Hollowell, who received 6,021 votes.

In the 2015 general election for District 22, according to the official certified returns from the Mississippi Secretary of State, Eugene Clarke received 8,149 votes and defeated African-American Democratic candidate Joseph Thomas, who received 6,985 votes.

Plaintiff Vernon Ayers is an African-American resident and registered voter in Washington County who votes in District 22.

* * *

At the end of trial, the parties also stipulated that the Mississippi Senate has never had more than 13 African-American members. The defendants argued that this fact, while true, was irrelevant. The objection is overruled. The relevance of this fact will become apparent later.

II. Legal Standard

A state violates § 2 of the Voting Rights Act:

if, based on the totality of circumstances, it is shown that the political processes leading to nomination or election in the State or political subdivision are not equally open to participation by members of a class of citizens protected by subsection (a) in that its members have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.²⁵

“The essence of a § 2 claim is that a certain electoral law, practice, or structure interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by black and white voters to elect their preferred representatives.”²⁶

The plaintiffs must begin by proving the three *Gingles* requirements. First is that “the racial group is sufficiently large and geographically compact to constitute a majority in a single-

²⁵ 52 U.S.C. § 10301(b).

²⁶ *Thornburg v. Gingles*, 478 U.S. 30, 47 (1986).

member district.”²⁷ Second, the plaintiffs must prove that “the racial group is politically cohesive.”²⁸ The third requirement is that “the majority votes sufficiently as a bloc to enable it usually to defeat the minority’s preferred candidate.”²⁹ “[T]he *Gingles* factors cannot be applied mechanically and without regard to the nature of the claim.”³⁰

Courts are then to consider “the Senate factors”:

1. The extent of any history of official discrimination in the state or political subdivision that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process;
2. The extent to which voting in the elections of the state or political subdivision is racially polarized;
3. The extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group;
4. If there is a candidate slating process, whether the members of the minority group have been denied access to that process;
5. The extent to which members of the minority group in the state or political subdivision bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process;
6. Whether political campaigns have been characterized by overt or subtle racial appeals; [and]
7. The extent to which members of the minority group have been elected to public office in the jurisdiction.³¹

The Senate factors are “neither comprehensive nor exclusive,” and “there is no requirement that any particular number of factors be proved, or that a majority of them point one

²⁷ *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006) (quotation marks and citation omitted).

²⁸ *Id.*

²⁹ *Id.* (brackets and ellipses omitted).

³⁰ *Voinovich v. Quilter*, 507 U.S. 146, 158 (1993).

³¹ *Gingles*, 478 U.S. at 36–37 (quotation marks and citations omitted).

way or the other.”³² They simply “provide salient guidance from Congress and the Supreme Court on how to examine the current effects of past and current discrimination and how those effects interact with a challenged law.”³³ The ultimate question continues to be “whether as a result of the challenged practice or structure plaintiffs do not have an equal opportunity to participate in the political processes and to elect candidates of their choice.”³⁴

“The Fifth Circuit has noted that it will be only the very unusual case in which the Plaintiffs can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of the circumstances.”³⁵

III. Discussion³⁶

A. The Board of Election Commissioners

The defendants first contend that they are improper parties because none of them caused or can remedy the boundaries of District 22. Since 1965, however, state redistricting cases in Mississippi have “always been directed primarily against the state executive officers charged with administering Mississippi’s election laws . . . the then members of the State Board of Election Commissioners and their subordinates.”³⁷ That is because although the Board has “no power to create reapportionment,” it does “control the continued election of members to a legislative body found to be unconstitutionally constituted,” and is “the only agency with

³² *Id.* at 45 (quotation marks and citation omitted).

³³ *Veasey v. Abbott*, 830 F.3d 216, 246 (5th Cir. 2016) (en banc).

³⁴ *Gingles*, 478 U.S. at 44 (quotation marks and citation omitted).

³⁵ *Benavidez*, 638 F. Supp. 2d at 713 (quotation marks and citation omitted).

³⁶ Parts III A and B resolve arguments first raised in the defendants’ September 2018 motion for summary judgment.

³⁷ *Connor v. Winter*, 519 F. Supp. 1337, 1340 n.1 (S.D. Miss. 1981) (three-judge court). Our defendants’ argument was actually made by the dissenting Judge in *Connor*. See *id.* at 1346 (Cox, J., dissenting) (“The majority herein has again cast a sovereign state into perilous and turgid waters to first be cast upon the rocky shores of Scylla because they were powerless to make the necessary changes, then only to be thrust into the dark brown vortex of Charybdis, when because of their impotency they are required to pay plaintiffs attorneys’ fees, litigation expenses, and costs.”).

statewide power to prevent the ballot placement of candidates for election to a malapportioned legislature.”³⁸ The defendants’ reply brief is silent on this caselaw. We will move on.

B. Affirmative Defenses

The defendants next argue that the statute of limitations has expired. They contend that this case should have been filed within three years of the Department of Justice’s September 2012 preclearance of the Senate map. Alternatively, the defendants say that laches should end this case because the plaintiffs’ “six-year delay” in bringing this lawsuit is inexcusable and prejudicial.

1. Statute of Limitations

The Court assumes for present purposes that a Voting Rights Act suit “for injunctive relief brought by a private litigant could be barred by the running of an analogous state statute of limitations.”³⁹ Even so, the plaintiffs’ suit is timely because: (1) they filed within three years of the last District 22 election “which improperly implemented” the Act,⁴⁰ and (2) they allege that District 22’s boundaries present a continuing violation of § 2 that will harm them again in the upcoming 2019 election cycle.⁴¹

2. Laches

a. Substantive Law

“Laches is an inexcusable delay on the part of the plaintiff that results in prejudice to the defendant.”⁴² “It assures that old grievances will some day be laid to rest, that litigation will be

³⁸ *Id.* at 1343.

³⁹ *Dotson v. City of Indianola*, 514 F. Supp. 397, 401 (N.D. Miss. 1981) (three-judge court). *But see Jeffers v. Clinton*, 730 F. Supp. 196, 201 n.5 (E.D. Ark. 1989) (three-judge court) (noting that the state defendants presented a laches defense in lieu of a statute of limitations defense).

⁴⁰ *Dotson*, 514 F. Supp. at 401.

⁴¹ See *Blackmoon v. Charles Mix Cty.*, 386 F. Supp. 2d 1108, 1115 (D.S.D. 2005).

⁴² *Radiator Specialty Co. v. Pennzoil-Quaker State Co.*, 207 F. App’x 361, 362 (5th Cir. 2004) (citation omitted).

decided on the basis of evidence that remains reasonably accessible and that those against whom claims are presented will not be unduly prejudiced by delay in asserting them.”⁴³

To succeed with a laches defense, the defendants must show “(1) a delay in asserting a right or claim; (2) that the delay was not excusable; and (3) that there was undue prejudice to the party against whom the claim is asserted.”⁴⁴ “Whether laches bars an action in a given case depends upon the circumstances of that case.”⁴⁵

“Measuring prejudice entails balancing equities.”⁴⁶ “When a district court is making an equity determination such as laches, the scope of its powers is broad, for breadth and flexibility are inherent in equitable remedies.”⁴⁷ “The Court must weigh the facts and interests on both sides, summon up the discretion of a chancellor, remember that it is a court of conscience and not of legal stricture, and come as close as it can to a fair result. Frequently there are some good arguments on both sides, and that is the case here.”⁴⁸

There is some uncertainty as to whether laches applies where there is a statute of limitations. A statute of limitations “itself takes account of delay,” and the “principal application” of laches “was, and remains, to claims of an equitable cast for which the Legislature has provided no fixed time limitation.”⁴⁹ In the redistricting context, the nature of laches as a “gap-filling, not legislation-overriding” doctrine suggests that it is best considered as a defense to

⁴³ *Env'tl. Def. Fund, Inc. v. Alexander*, 614 F.2d 474, 481 (5th Cir. 1980).

⁴⁴ *Id.* at 478 (citations omitted).

⁴⁵ *Id.*

⁴⁶ *Id.* at 479.

⁴⁷ *Radiator Specialty*, 207 F. App'x at 362 (quotation marks and citation omitted).

⁴⁸ *Jeffers*, 730 F. Supp. at 202.

⁴⁹ *Petrella v. Metro-Goldwyn-Mayer, Inc.*, 572 U.S. 663, 678 (2014); see also *Alexander*, 614 F.2d at 478; *Dotson*, 514 F. Supp. at 400 (discussing and rejecting a laches argument predicated upon “the plaintiffs’ delay exceed[ing] the applicable limitations period”).

last-minute requests for injunctive relief, and should not be wielded more than a year before an election—as our defendants have done by filing a dispositive laches motion in September 2018.⁵⁰

Other authority suggests that laches is unavailable in cases like ours, where the plaintiffs allege an ongoing injury and seek a permanent injunction. In *Miller v. Board of Commissioners*, for example, the Middle District of Georgia held that “laches does not apply to voting rights actions wherein aggrieved voters seek permanent injunctive relief insofar as the electoral system in dispute has produced a recent injury or presents an ongoing injury to the voters.”⁵¹

To put any doubts to rest, though, the Court will proceed to analyze the defense.

b. Analysis

The laches argument quickly fails as to plaintiffs Ayers and Lawson. There is no evidence that either had any indication of a problem with District 22’s boundaries and slept on his rights. The mere fact that they are voters in District 22 is not enough, and there is no basis to conclude that DOJ preclearance vests voters with the knowledge of a claim sufficient to hold them accountable via laches.

On the other hand, the defendants make a compelling case that plaintiff Thomas unnecessarily delayed bringing this suit. Prior to preclearance, he expressed to DOJ his belief that the boundaries violated the Voting Rights Act. He then did not act on that belief after DOJ precleared the plan.

Thomas testified that in 2012, he did not know that private parties could bring a § 2 suit. He learned about this legal remedy in mid-2018. Laches, however, “does not depend on

⁵⁰ *Petrella*, 572 U.S. at 680; see *Blackmoon*, 386 F. Supp. 2d at 1115 (concluding that voting rights cases in which the laches defense prevailed involved plaintiffs who “waited until either elections or deadlines relating to elections were imminent before filing their claims”).

⁵¹ 45 F. Supp. 2d 1369, 1373 (M.D. Ga. 1998) (citation and emphasis omitted).

subjective awareness of the legal basis on which a claim can be made.”⁵² It instead asks whether plaintiffs have “an adequate indication” of the problem, which means “[information] enough to alert them to the claim that the authorities were not acting legally.”⁵³ The evidence shows that Thomas had that information. His unawareness of the law in 2012, while credible, is not enough to excuse his delay in pursuing a remedy.

Yet there are other facts that render Thomas’s delay excusable. Thomas did not perceive a legal violation in 2012 and then sit on his laurels. He decided to take a risk and enter the 2015 election in an attempt to prove that an African-American *could* win District 22 despite its boundaries. In other words, the time between 2012 and 2015 is excusable, if not laudable, because Thomas sought to remedy the problem through the political process.⁵⁴

The defendants hammer the idea that District 22’s BVAP cannot constitute a § 2 violation because, as the Supreme Court wrote, “minority voters are not immune from the obligation to pull, haul, and trade to find common political ground, the virtue of which is not to be slighted in applying a statute meant to hasten the waning of racism in American politics.”⁵⁵ But “pull, haul, and trade to find common political ground” is exactly what Thomas did in the 2015 election cycle. He should be credited for turning to the political process first—for attempting to make this litigation unnecessary—rather than penalized for the time that elapsed between preclearance in 2012 and the November 2015 election.

⁵² *Alexander*, 614 F.2d at 479.

⁵³ *Id.*

⁵⁴ In notable contrast is the defendants’ principal case, in which the plaintiff admitted that he delayed filing suit because he was not “a political person” and “kept thinking at some point that somebody would step up to protect the interest of Lincoln Parish.” *Maxwell v. Foster*, No. 98-1378, 1999 WL 33507675, at *3 (W.D. La. Nov. 24, 1999) (brackets omitted).

⁵⁵ *Johnson v. De Grandy*, 512 U.S. 997, 1020 (1994). Twenty-five years later, Americans are likely more aware that racism can spike just as it can wane. See, e.g., John Eligon, *Hate Crimes Increase for the Third Consecutive Year*, *F.B.I. Reports*, N.Y. Times, Nov. 13, 2018.

What remains is prejudice. “It is difficult to say that a government agency can be prejudiced by forcing it to comply with the law,” the Fifth Circuit has observed.⁵⁶ But plainly there are circumstances where prejudice to the government warrants application of the doctrine. In *Alexander*, for example, the court found that a suit against the Army Corps of Engineers was properly dismissed because the plaintiffs had inexcusably delayed while the Corps spent \$176 million on the project in question.⁵⁷ And in the defendants’ principal case, *Maxwell v. Foster*, the court found laches appropriate because the plaintiffs had inexplicably delayed a suit seeking to declare the *entire* state legislative map unconstitutional. No. 98-1378, 1999 WL 33507675, at *4 (W.D. La. Nov. 24, 1999).

The evidence in our case weighs against a finding of undue prejudice. The plaintiffs filed this suit in July 2018. That was 16 months before the 2019 general election, 13 months before the primaries, and eight months before the qualification deadline. This timeframe is more than enough to litigate their single-district, single-count claim.⁵⁸ It is not remotely comparable to the \$176 million sum the *Alexander* court noted or the statewide relief the plaintiffs in *Maxwell* sought.

The Court will turn to the merits.

C. Section 2 of the Voting Rights Act

1. The *Gingles* Preconditions

The evidence on the first and second *Gingles* preconditions is not contested.

⁵⁶ *Alexander*, 614 F.2d at 480.

⁵⁷ *Id.*

⁵⁸ There is the matter of the flip-side of the argument. Thomas filed this suit only after running in the first election under the current boundaries. Had he filed before running, the defendants would almost certainly be asking the Court to dismiss the action because it is a district that theoretically can be won by an African-American. *He should at least try first*, they would say. In 2015, however, Thomas tried, and he now makes a compelling case (as explained more fully below) as to why new boundaries should be drawn.

African-Americans in District 22 are already a sufficiently large and geographically compact group as to constitute a majority in a single-member district; the present BVAP exceeds 50%. The plaintiffs' three alternative maps show that the BVAP can be increased without impairing the District's compactness.⁵⁹

It also is undisputed that African-American voters in District 22 are politically cohesive. Dr. Palmer's analysis is sound and Dr. Morrison did not attempt to opine otherwise, as he admitted that he has never run EI and does not perform that kind of analysis. Dr. Morrison also did not dispute Dr. Palmer's finding of racially polarized voting.

The parties genuinely dispute the third *Gingles* precondition: whether white bloc voting usually defeats the African-American community's candidate of choice. But the defendants' expert opinions on this point turned out to be flawed in important ways.

We should start by observing that some of Dr. Morrison's methods were unreliable and led him to incorrect facts. In several instances he inaccurately coded winning officials as having lost, or incorrectly coded a candidate's race—an error apparently caused by the fact that he discerned a candidate's race via Facebook and other public websites.⁶⁰ At other times, he did not have any evidence as to whether a candidate was in fact preferred by the African-American community, and simply assumed that black candidates were preferred by the black community.

⁵⁹ Although Dr. Morrison noted at trial that he did not contest the first *Gingles* precondition, his report asserted that Plan 1 would "damage" District 23's compactness. This assertion is not borne out by the facts. Cooper's supplemental report shows that redrawn Districts 22 and 23 would satisfy the Polsby-Popper test and have Reock scores well-within the range of Mississippi's 2012 Senate and House maps.

⁶⁰ This kind of coding is truly perilous. *Cf. Fish v. Kobach*, 309 F. Supp. 3d 1048, 1092–93 (D. Kan. 2018) ("Richman and a graduate student assistant went through the suspense list and determined which names were, in their view, foreign. Neither Dr. Richman nor his assistant had any experience in identifying so-called foreign names. By his own admission, their determinations were subjective and based primarily on whether the name was 'anglophone,' meaning originating in the British Isles. Dr. Richman also testified that their work was performed quickly, and that they made many mistakes along the way. A review of their coding revealed inconsistencies; for example, of five individuals with the last name of 'Lopez,' two were coded as foreign and three were coded as non-foreign. On cross examination, Dr. Richman admitted that he would have coded Carlos Murguia, a United States District Judge sitting in this Court, as foreign.").

Dr. Morrison's decision to include uncontested races in his analysis is curious, too; on cross-examination he admitted that these only shed light "indirectly" on the third *Gingles* precondition.^{61, 62}

The more significant problem lies in the scope of Dr. Morrison's review. In looking at local elections *within* Counties, he never stepped back to consider whether white voters across *the entirety of* District 22 engage in bloc voting. It is no surprise that voters in Humphreys County would elect an African-American Circuit Clerk. But Senate District 22 spans five other Counties. Dr. Morrison never considered how the aggregate population of District 22 tends to vote when electing a Senator to represent the entire area.

Dr. Morrison is an experienced demographer. He knows the problems with his testimony: he admitted that endogenous elections have more persuasive value than the local elections he compiled, he did not look at voter turnout in odd-numbered years, and he conceded that the Census explicitly cautions that survey respondents overreport their voting behavior.⁶³ He may also be hemmed in by the instructions given to him by his clients.

Whatever Dr. Morrison's reasons, though, in this matter his review was too narrow. He is like a climatologist arguing that December is a warm month solely because December 9, 10, 18, and 31 were warm days; the limited facts he has gathered do not support his broad conclusions. It is not credible to draw a conclusion about white bloc voting in District 22 based exclusively on

⁶¹ Uncontested elections present "special circumstances." *Gingles*, 478 U.S. at 51, 57.

⁶² It also is not clear if Dr. Morrison's definition of viable candidate satisfies Fifth Circuit caselaw. *Compare* Defendants' Exhibit 14 at 6 n.4 *with* *Teague v. Attala Cty., Miss.*, 92 F.3d 283, 289 (5th Cir. 1996). The Court does not recall hearing evidence on this point and declines to make any findings on it.

⁶³ Dr. Morrison testified that the plaintiffs' alternate maps engage in packing and cracking. He is incorrect. There is neither, since African-Americans would not "constitute an excessive majority" in District 22, *Voinovich*, 507 U.S. at 154 (quotation marks and citation omitted), and because District 23 would remain an influence district, *see Smith*, 189 F. Supp. 2d at 536-37. The fact that BVAP in District 23 would "necessarily be reduced" in a redrawn map is no basis to enter judgment for the defendants; some "loss of influence" is "found in every § 2 case." *Clark v. Calhoun Cty., Miss.*, 21 F.3d 92, 95 (5th Cir. 1994).

the fact that there are some black elected officials in parts of the District.⁶⁴ The Fifth Circuit rejected this reasoning 25 years ago when it found that “municipal elections in Bruce and Vardaman do not demonstrate that black citizens have an equal opportunity to elect their preferred candidates to county-wide offices.”⁶⁵

The defendants certainly attempted to discredit Dr. Palmer’s competing report. They pointed out that in the 2015 Senate District 22 election, approximately 1,500 voters in Bolivar County received ballots for the wrong Senate race. Dr. Palmer freely agreed that this was a “significant election administration error” which justified his decision to exclude those precincts, in that race, from the EI analysis. He explained that the analysis remains valid because EI identifies the pattern of behavior running through a series of elections over time.⁶⁶ The defendants presented no evidence indicating that Dr. Palmer’s approach was in error or would cast any shadow on his conclusions.⁶⁷

Considering all of the expert testimony, the Court finds Dr. Palmer’s thorough and largely un rebutted analysis to be persuasive. It accepts his findings as to white bloc voting and rejects Dr. Morrison’s alternate perspective.⁶⁸ The result is that the plaintiffs have established that white

⁶⁴ Perhaps due to the concerns raised on cross-examination, defense counsel did not attempt to rehabilitate Dr. Morrison’s testimony and waived redirect of his only expert.

⁶⁵ *Clark*, 21 F.3d at 97. “Thus, in analyzing voting patterns in Calhoun County, the district court should accord greater weight to the virtual absence of black electoral success in county-wide elections as opposed to their limited electoral success in municipal elections.” *Id.*

⁶⁶ See *Gingles*, 478 U.S. at 57 (“[A] pattern of racial bloc voting that extends over a period of time is more probative of a claim that a district experiences legally significant polarization than are the results of a single election.”); *Teague*, 92 F.3d at 288–89 (“Vote dilution is a determination that must be made over time and over the course of many elections.”).

⁶⁷ Defense counsel later speculated that Thomas’s efforts to draw white crossover votes had *succeeded*—maybe white voters in Bolivar County *would* vote for black candidates if only given the chance, he said—but the votes had gone uncounted because these voters were given the wrong ballot. Counsel for the plaintiffs called it “fantastical” to assume that these predominantly white precincts would have voted for Thomas, given the long, documented history of white bloc voting in Mississippi. Of course, none of this argument constitutes evidence. What is in evidence, however, is Thomas’s testimony that he also pursued white crossover votes in Madison County—a place without election maladministration—and still did not garner enough to prevail.

⁶⁸ See *Monroe v. City of Woodville, Miss.*, 881 F.2d 1327, 1330 (5th Cir. 1989) (“At the outset, we note that the district judge discounted the statistical evidence presented by the appellants as severely flawed. The weaknesses he observed are particularly damaging to the appellants’ case because this information constituted the bulk of their

bloc voting in District 22 defeats the African-American community's candidate of choice. The plaintiffs have proven all three *Gingles* preconditions.

2. The Senate Factors

The next considerations are the Senate factors, which through different angles try to shed light on whether African-Americans in District 22 have an equal opportunity to elect their candidate of choice. Answering this ultimate question “depends upon a searching practical evaluation of the past and present reality, and on a functional view of the political process.”⁶⁹

First, Mississippi plainly has a long history of official discrimination against African-Americans seeking to vote.⁷⁰ To their credit, the defendants acknowledged this fact.

The plaintiffs supplemented this history with reports from Fred Banks, a former Legislator and Justice of the Mississippi Supreme Court, and John Horhn, a State Senator for the past 26 years. Banks and Horhn described the slow gains African-Americans made in running for and winning seats in the Mississippi Legislature. They also described racial appeals they experienced and observed during their decades in elective office.⁷¹ Their reports will be discussed more below.

Second, Dr. Palmer presented expert testimony that voting in District 22 features “a high level of racial polarization.” The defendants' expert did not challenge this factor.

The third and fourth factors are irrelevant. Neither side presented evidence that District 22 has unusual practices that enhance the opportunity for racial discrimination or a candidate slating process.

evidence on the issues of black political cohesiveness and white bloc voting. Dr. Love, appellants' statistical expert, faced difficulties in producing useful data for the court.”).

⁶⁹ *Gingles*, 478 U.S. at 45 (quotation marks and citations omitted).

⁷⁰ *See Teague*, 92 F.3d at 293–94 (“That Mississippi has a long and dubious history of discriminating against blacks is indisputable.”).

⁷¹ Defense counsel objected to the reports' descriptions of racial appeals, believing them to be stale. The following discussion will show that the Court has considered the reports but given them appropriate weight.

Fifth, the plaintiffs presented evidence of substantial socio-economic disparities between District 22's African-American and white populations. There are vast differences between the two groups on education, employment, income, housing, and health indices, among others, that ultimately reflect the effects of slavery and segregation.

The plaintiffs, although “not required to prove a causal connection between these factors and a depressed level of political participation,” introduced evidence that these socio-economic factors likely negatively impact voter turnout and that African-American communities in the Delta are less likely to have transportation options that facilitate voter turnout in odd-year elections.⁷² Their evidence is consistent with the Supreme Court's recognition “that political participation by minorities tends to be depressed where minority group members suffer effects of prior discrimination such as inferior education, poor employment opportunities, and low incomes.”⁷³

The defendants' expert sought to minimize the on-the-ground realities by pointing to statewide data showing that African-American Mississippians report higher voter turnout than white Mississippians in even-year elections. These data points fail to persuade. They look at the wrong jurisdiction, the wrong election years, and rely upon known issues with self-reported voting surveys—issues that EI, in contrast, seeks to overcome. The fifth Senate factor supports the plaintiffs.

The sixth Senate factor asks about overt or subtle racial appeals. The Banks and Horhn reports described several overt racial appeals made in elections up to 2004, but the plaintiffs did not put on evidence of any recent racial appeals.⁷⁴

⁷² *Id.* at 294.

⁷³ *Gingles*, 478 U.S. at 69 (citations omitted).

⁷⁴ There have been overt racial appeals in Mississippi elections since 2004. During the hotly-contested Initiative 42 campaign in 2015, for example, State Representative Bubba Carpenter told the Tishomingo County Midway

Seventh, the plaintiffs presented evidence that African-Americans have not been elected to the Senate from District 22. The defendants' attempt to reframe the issue and look at local offices within District 22—which, not incidentally, have higher BVAPs—is not persuasive for the reasons already discussed at length.

Even after considering all of these factors, the Supreme Court has instructed district courts to be cautious about finding a § 2 violation where the “districting scheme” features “majority-minority districts in substantial proportion to the minority’s share of voting-age population.”⁷⁵ Electoral maps that “apparently provid[e] political effectiveness in proportion to voting-age numbers” typically do not “deny equal political opportunity” and should not be the basis for liability.⁷⁶

That concern is unwarranted here. The 2010 Census data showed that Mississippi was 59.1% white and 40.9% non-white. After redistricting with these data, therefore, one might have expected fresh maps to result in an upper legislative chamber with something like 31 white Senators and 21 non-white Senators. But there are only 15 majority-minority Senate Districts and

Republican Rally that “[i]f 42 passes in its form, a judge in Hinds County, Mississippi, predominantly black—it’s going to be a black judge—they’re going to tell us where the state education money goes.” Sam R. Hall, *Rep. Carpenter injects race into Initiative 42*, The Clarion-Ledger, Oct. 18, 2015. His pitch was an appeal to racism and fear, not a statement of fact: the Hinds County bench was divided equally between “blacks” and whites.

As recently as November 2018, U.S. Senator Cindy Hyde-Smith was criticized for saying, at a public campaign rally in Tupelo, that she was so loyal to one of her friends (who she then brought out from the audience) that “I would fight a circular saw for him. . . . If he invited me to a public hanging, I’d be on the front row.” Caleb Debillion, *Hyde-Smith deflects questions about ‘public hanging’ comments*, Daily Journal, Nov. 12, 2018. Some thought she was making an “inartful compliment.” *Did Cindy Hyde-Smith’s inartful compliment of a supporter go too far?*, Y’all Politics, Nov. 11, 2018. Others thought she was making a “sick” reference to lynching, see Matthew Haag, *Mississippi Senator’s ‘Public Hanging’ Remark Draws Backlash Before Runoff*, N.Y. Times, Nov. 12, 2018—a sensitive subject given that her opponent in the runoff election was African-American and Mississippi has a history of “brutal and terrifying lynchings.” Eric Etheridge, *Judge Carlton Reeves: Resurrecting the Nightmarish Specter of Lynchings in Mississippi*, Breach of Peace, Feb. 11, 2015, <https://breachofpeace.com/blog/?p=612>.

These examples are not in evidence and will not be considered further. Even if they were in evidence, on this record, the Court would still find that no racial appeals, overt or implied, have been recently made in District 22 or have had an effect on any District 22 election within the timeframe of the plaintiffs’ case.

⁷⁵ *De Grandy*, 512 U.S. at 1013.

⁷⁶ *Id.* at 1014.

the Senate has never had more than 13 African-American members.⁷⁷ In plain English, Mississippi's Senate is much whiter than Mississippi.

Congress has emphasized that the representation gap is not itself a sufficient reason to redistrict the Senate and create additional majority-minority districts. Section 2 of the Voting Rights Act explicitly denies “a right to have members of a protected class elected in numbers equal to their proportion in the population.”⁷⁸ The representation gap instead suggests that the Mississippi Senate does not provide political effectiveness in proportion to minority voting-age numbers and, therefore, that the defendants do not qualify for the kind of § 2 immunity the Supreme Court set forth in *De Grandy*.

* * *

Having satisfied the three *Gingles* preconditions, and given the persuasive evidence on Senate factors one, two, five, and seven, the plaintiffs have established that District 22's lines result in African-Americans having less opportunity than other members of the electorate to elect the State Senator of their choice.

D. Additional Arguments

The defendants seek judgment as a matter of law by contending that “as a matter of simple mathematics,” a minority group that has a voting-age population of 50% or more cannot prove a denial of equal opportunity under § 2. Put bluntly, the claim is that African-Americans' low turnout in odd-year elections is their problem. The Fifth Circuit, however, foreclosed this line of reasoning in *Monroe v. City of Woodville, Mississippi*.⁷⁹ “Unimpeachable authority from

⁷⁷ Demography is not necessarily destiny, of course. It should go without saying that voters can (and do) cross racial lines to vote for their candidate of choice: communities of color sometimes elect white politicians, and vice versa. In the Jackson region, District 29 is a majority-minority area (with a BVAP of 53.4%) that continues to elect a white person to the Senate.

⁷⁸ 52 U.S.C. § 10301(b).

⁷⁹ 881 F.2d 1327, 1329 (5th Cir. 1989).

our circuit has rejected any *per se* rule that a racial minority that is a majority in a political subdivision cannot experience vote dilution.”⁸⁰ Put differently, “low minority voter turnout does not militate against finding a Section 2 violation.”⁸¹

The defendants then argue that finding a § 2 violation in this case will open the floodgates for plaintiffs to challenge every majority-minority district in Mississippi. But this is at odds with Dr. Morrison’s (accurate) observation that Mississippi has a substantial number of African-American elected officials. In the hundreds of municipal and county districts in which they sit, the presumptive plaintiffs will be unable to prove a § 2 violation precisely because they will have experienced electoral success despite the legacy of discrimination. The Court fundamentally disagrees that this ruling will have significant reach outside of Districts 22 and 23.

E. Remedies

As the Court recited in its February 13 Order, the Legislature is entitled to the first opportunity to redraw District 22 and, if it chooses, extend the March 1 qualification deadline for candidates in the affected Districts.⁸² “Although it may be difficult for the Legislature to adopt a plan,” a “legislative plan is unequivocally to be preferred over a court-ordered plan . . . [W]e encourage the Legislature to act.”⁸³

IV. Conclusion

The plaintiffs have established by a preponderance of the evidence that the present boundaries of Mississippi Senate District 22 violate § 2 of the Voting Rights Act. The Court will decline to order any specific relief while the Mississippi Legislature considers whether to redraw

⁸⁰ *Id.* at 1333 (citation omitted). Practically speaking, this prohibits entrenched political powers from drawing a series of extremely marginal majority-minority districts with the expectation that the majority-minority group will be unable to turn out in numbers sufficient to ever elect a candidate of their choice.

⁸¹ *Benavidez*, 638 F. Supp. 2d at 725 (collecting cases).

⁸² *See LULAC*, 548 U.S. at 416.

⁸³ *Smith*, 189 F. Supp. 2d at 511-12.

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the District and extend the candidate qualification deadline. A hearing will be set for the near future.

SO ORDERED, this the 16th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

By noon tomorrow, the defendants shall update the Court on the Legislature's progress, if any, in redrawing Senate District 22.

By 2:00 PM tomorrow, the defendants shall respond to the plaintiffs' motion to extend the qualifying deadline.

The Court expects to rule on all of the pending motions before February 28, 2019.

SO ORDERED, this the 25th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 14

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**JOSEPH THOMAS; VERNON AYERS;
and MELVIN LAWSON**

PLAINTIFFS

v.

NO. 3:18-cv-00441-CWR-FKB

**PHIL BRYANT, Governor of the State of
Mississippi; DELBERT HOSEMAN,
Secretary of State of the State of Mississippi;
and JIM HOOD, Attorney General of the
State of Mississippi, all in the official capacities
of their own offices and in their official
capacities as members of the State Board
of Election Commissioners**

DEFENDANTS

**MEMORANDUM OF GOVERNOR PHIL BRYANT AND SECRETARY
OF STATE DELBERT HOSEMAN IN OPPOSITION TO PLAINTIFFS'
MOTION TO EXTEND QUALIFYING DEADLINE IN TWO SENATE DISTRICTS**

Governor Phil Bryant and Secretary of State Delbert Hosemann, two of the defendants, respectfully submit this response in opposition to plaintiffs' motion to extend the qualifying deadline in two Senate districts. [Dkt. # 66]. The request for an extension of the March 1, 2019, qualifying deadline is premature until both this Court and the United States Court of Appeals for the Fifth Circuit have ruled on defendants' pending motions to stay this Court's February 16, 2019, memorandum opinion and order. [Dkt # 61]. Further, until the Mississippi Legislature has had an opportunity to propose a remedy and this Court has had an opportunity to consider such a remedy, the district or districts, in addition to Senate District 22, that may be impacted is unknown. Senate District 22 is contiguous with eight existing Senate Districts.

It is remarkable that, in support of their motion for this Court's precipitous intervention in Mississippi's election process, plaintiffs rely on a decision in which the Court refused to

intervene. *Watkins v. Mabus*, 771 F. Supp. 789 (S.D. Miss. 1991). Although the legislative apportionment adopted in 1982 had become unconstitutional as a result of the 1990 census, this Court permitted that plan to be used in the 1991 elections, ordering that legislative elections would be held under “the apportionment plan now in effect (1982 plan).” *Id.*, at 797. That is exactly what this Court ought to do here.

While the Court was hearing evidence and arguments that led to its ultimate decision not to intervene, the Court did temporarily enjoin the qualifying deadline of July 19, 1991, *id.*, at 797, ultimately extending it to August 12, 1991. *Id.*, at 797.¹ The Legislature did not share plaintiffs’ view of the ease of “hold[ing] elections even where the qualifying deadlines are five weeks from the primary.” [Dkt. # 67 at 2.] Before the next legislative elections, the Legislature amended the law to advance the filing deadline to the current date of March 1. 1994 Miss. Gen. Laws ch. 564 § 90, codified as Miss. Code Ann. § 23-15-299. Lest there be any mistake, the short title of the bill in part declared its purpose “TO REVISE THE TIME FOR PAYMENT OF ASSESSMENTS BY CANDIDATES IN PARTY PRIMARY ELECTIONS.” That amendment was approved by the United States under § 5 of the Voting Rights Act, 51 U.S.C. § 10503. To suggest to this Court that the deadline is insignificant is to ignore the experience of the legislators who dealt with the consequences the last time this Court changed qualifying deadlines.

This Court has not disputed defendants’ demonstration that “none of them caused or can remedy the boundaries of District 22.” [Dkt. # 61 at 18.] As defendants in this action, however, they do have a right to be heard on any remedy this Court may order. However, sole responsibility for adopting legislative redistricting laws in Mississippi resides with the

¹ It is certainly true that a court of equity may extend the qualifying deadlines, as the Supreme Court authorized in *Connor v. Johnson*, 402 U.S. 690 (1971). That case, however, had already been pending at least since 1965, *Connor v. Johnson*, 256 F. Supp. 962 (S.D. Miss. 1966), unlike this case, in which defendants saw plaintiffs’ proposed plans barely two months ago.

Legislature.

As directed by this Court [Dkt. # 68], defendants have contacted the leadership of the two chambers of the Legislature. Although defendants do not represent the Legislature, they are authorized to report that, should the stay motions pending before this Court and the Fifth Circuit be denied, the Senate desires the opportunity to enact a new redistricting plan redrawing Senate District 22. Defendants, as litigants in this Court, expect to be in a position to support that plan.

Plaintiffs will suffer no cognizable injury from awaiting the action of the Legislature. Having waited six years to file suit, they can hardly complain of waiting a few more days. This Court held in *Watkins* that a violation of § 2 of the Voting Rights Act, 51 U.S.C. § 10503, even where established, does not inflict irreparable injury. 771 F. Supp. at 805 n.16, citing *Chisom v. Roemer*, 853 F.2d 1186, 1188-89 (5th Cir. 1988).² If plaintiffs can demonstrate any harm from a delay, this Court can repair it.

The Legislature faces a particularly difficult task in responding to this Court's order, because the order gives no indication of what remedy is required.³ As the Court observed, plaintiffs presented no evidence of "whether a BVAP lower than 62% would be sufficient to elect the African-American community's candidate of choice." [Dkt. # 61 at 8]. Nor did the Court answer that question, probably because, as this Court well knows, African-Americans are not entitled to elect a candidate of their choice, but only to an equal opportunity to do so. Nothing in this Court's order suggests what level of BVAP would be sufficient, in this Court's view, to provide that equal opportunity.

Nevertheless, if a stay is not forthcoming, the Legislature will do its best to adopt a

² That statute in 1991 was indisputably unconstitutional. District 22, by contrast, is indisputably constitutional.

³ One reason this Court permitted elections to proceed in 1991 was that it had not established the criteria that should govern any remedy. *Watkins*, 771 F. Supp. at 799.

lawful plan. In the meantime, this Court should take no action, except to rule on the pending motion for stay. [Dkt. # 63].

This the 26th day of February, 2019.

Respectfully submitted,

s/ Michael B. Wallace

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ATTORNEYS FOR ALL DEFENDANTS

CERTIFICATE OF SERVICE

I, Michael B. Wallace, hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification to all counsel of record.

This the 26th day of February, 2019.

s/ Michael B. Wallace
Michael B. Wallace

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

The Mississippi Legislature has not redrawn the boundaries of Senate District 22, and the candidate qualification deadline is approaching. The Court therefore orders as follows:

1. The candidate qualification deadline is extended to March 15, 2019, for all persons seeking to qualify for Mississippi Senate Districts 22 and 23. No other deadlines, jurisdictions, or offices are affected.
2. The boundaries of Districts 22 and 23 are amended to conform to plaintiffs' illustrative Plan 1. The defendants shall publish and transmit the Plan to the affected Circuit Clerks and other relevant officials.

A separate Final Judgment shall issue this day.

SO ORDERED, this the 26th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

FINAL JUDGMENT

Having resolved all of the claims and defenses in this case, this matter is due to be closed.

Accordingly,

IT IS HEREBY ORDERED AND ADJUDGED that judgment is entered in favor of plaintiffs Joseph Thomas, Vernon Ayers, and Melvin Lawson and against defendants Governor Phil Bryant, Attorney General Jim Hood, and Secretary of State Delbert Hosemann, all in their official capacities.

SO ORDERED AND ADJUDGED, this the 26th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 17

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

This afternoon, two of the three defendants filed a second motion to stay pending appeal.¹ They contend that the remedy ordered by the Court, Plan 1, will prejudice them because the two Republicans who filed to run for Senate District 22 now find themselves in District 23.² The movants have attached a February 27, 2019 affidavit from the Chairman of the Mississippi Republican Party.

It is not clear why this information is being presented for the first time on February 28. The affidavit says that Hayes Dent, the better-known of the two Republicans to qualify, filed his candidacy papers more than a month ago, on January 22. The defendants could have raised any concerns with his residency during the trial on February 6 and 7, during the parties' telephone conference with the Court on February 21, or in any of their numerous letters and filings since then. Why they did not is baffling.³

It also is surprising that the movants now claim an interest in remedies. The February 21 teleconference—which Secretary Hosemann personally joined—explicitly covered whether the parties sought additional hearings and whether the defendants would be submitting their own

¹ The other defendant, the State's chief legal officer, remains on the sidelines.

² The movants assert that these individuals will have to file their qualification papers again.

³ Incumbent District 23 Senator Briggs Hopson arrived at the trial just after it concluded. Mr. Dent never appeared.

Plan. The parties convinced the Court that no further hearings were necessary.⁴ The defendants said they would confer to be sure, then made no request at all. The lack of urgency was apparent.

The resulting impression is that the movants sought to raise these new issues only when their first motion for stay pending appeal was denied. Indeed, movants' counsel advised the Court that the Legislature would take up the Court's suggestion to redraw District 22 *only if* the motions for stay were denied here and in the Fifth Circuit. With the impending qualification deadline, and because the Legislature had not redrawn the district or announced that it would take up the matter, the Court felt compelled to move forward with a remedy. Docket No. 74.

There are additional issues that warrant discussion at a hearing. Most importantly, it is not clear that this Court has jurisdiction given the two Notices of Appeal that have already been filed. If jurisdiction is proper, the parties should address whether the additional evidence can be considered, since it is not "newly discovered" and, for that matter, comes from a non-party that has not intervened in this litigation.

A final observation may be worth mentioning. In reviewing the evidence in this case, the Court saw no significant difference between illustrative Plans 1 and 2.⁵ If Plan 2 would better protect the movants' partisan interests, assuming that is something they can assert in this litigation, then by all means the parties should see if some sort of compromise can be reached. As in every case over which this Court presides, the parties are encouraged to seek an amicable resolution.

⁴ That teleconference followed the Court's ruling that it would "decline to order any specific relief while the Mississippi Legislature considers whether to redraw the District and extend the candidate qualification deadline." Docket No. 61.

⁵ Plan 3 was the least desirable option, in the Court's view, because it would have affected an additional Senate District and impacted more counties, precincts, and voters.

The plaintiffs shall respond to the pending motion by close of business tomorrow, March 1, 2019. A hearing will be held on Monday, March 4, 2019 at 9:00 A.M.

SO ORDERED, this the 28th day of February, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

EXHIBIT 18

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JOSEPH THOMAS, et al.

PLAINTIFFS

V.

CAUSE NO. 3:18-CV-441-CWR-FKB

PHIL BRYANT, et al.

DEFENDANTS

ORDER

Two of the three defendants have filed a second motion to stay pending appeal. Several responses have been submitted and a hearing was held on March 4, 2019 to consider the issues. The Court has personal and subject matter jurisdiction to consider the present motion.

The movants do not attempt to meet the usual four-part standard for stays pending appeal. Instead, they seek a stay because their preferred candidates for Senate District 22 live outside of the District's new boundaries.

The Court has substantive and procedural concerns. First, as movants' counsel acknowledged at the hearing, these candidates' addresses were not relevant to the determination of a lawful remedy in this case.¹ Even if relevant, though, it is problematic that the candidates' addresses were known to the movants before trial, during trial, and before entry of Final Judgment, but were not raised. *See Puckett v. United States*, 556 U.S. 129, 134 (2009). The movants also never responded to the Court's inquiries into a remedial plan of their own—a plan which could have resolved their current objection.

Given the circumstances, the motion for stay pending appeal must be denied.

SO ORDERED, this the 6th day of March, 2019.

s/ Carlton W. Reeves
UNITED STATES DISTRICT JUDGE

¹ All plans entered into the record, including the one adopted by the Court, kept incumbents in their Districts.

EXHIBIT 19

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JOSEPH THOMAS, ET AL

PLAINTIFFS

VS.

CIVIL NO. 3:18CV441-CWR-FKB

PHIL BRYANT, ET AL

DEFENDANTS

**TRANSCRIPT OF TRIAL
VOLUME 1**

BEFORE THE HONORABLE CARLTON W. REEVES
UNITED STATES DISTRICT JUDGE
FEBRUARY 6, 2019
JACKSON, MISSISSIPPI

APPEARANCES:

FOR THE PLAINTIFFS: ROBERT B. MCDUFF
JON GREENBAUM
ARUSHA GORDON
POOJA CHAUDHURI
BETH L. ORLANSKI

FOR THE DEFENDANTS: TOMMIE S. CARDIN
B. PARKER BERRY
MICHAEL B. WALLACE
DOUGLAS T. MIRACLE

REPORTED BY: BRENDA D. WOLVERTON, RPR, FCRR, CRR
Mississippi CSR #1139

501 E. Court Street, Ste. 2.500
Jackson, Mississippi 39201
(601) 608-4188

1 Plaintiff Joseph Thomas, then Plaintiff Melvin Lawson, and then
2 finally our demographic expert, Bill Cooper. We have
3 stipulated with the defendants as part of the pretrial order
4 that Plaintiff Vernon Ayers is a registered voter who votes in
5 Senate District 22, so we believe his standing is already
6 established, and Mr. Thomas and Mr. Lawson will present
7 evidence to establish their standing.

8 The last thing I want to mention is because of the
9 timetable of the 2019 election, if you find a Section 2
10 violation, there obviously will be remedial proceedings. Our
11 suggestion is that as soon as you reach a decision, we think it
12 would be useful for you to announce that decision. Obviously
13 if there is no violation, nobody needs to worry about it
14 anymore.

15 If there is a violation, we suggest that it be
16 announced and the legislature be given two weeks to adopt a
17 remedial plan if they choose to do so. Case law is very clear
18 they should be given the first opportunity. They are in
19 session. They know about this case. They know there is a
20 possibility a violation could be found. So I think two weeks
21 is ample time for them to devise and pass a proposed plan
22 redistricting Section 22 and curing the dilution. They can do
23 it with changing two districts, as we have proven. They can
24 change three districts. They can do what they want to. If
25 they think it's important to put cities back together, they can

1 A Well, that's one reason why I include exogenous elections
2 as well, and we see a consistent pattern in the 2015 results
3 across Senate District 22 and the other exogenous elections in
4 that year which suggest that the exclusion of these voters is
5 not going to dramatically change the results.

6 Q But you would agree with me that it is a pretty serious
7 difference when you exclude 1,508 votes in an election where
8 the winner only won by 1,164 votes?

9 A Yes.

10 Q You would agree with that, wouldn't you?

11 A I would agree that was a significant election
12 administration error.

13 Q Yes. And I believe you testified that one of the
14 significant advantages of EI over HPA is that you are able to
15 identify specific information and use that information as
16 opposed to just generalized information. Is that correct?

17 A I'm not sure I understand what you mean by specific
18 information.

19 Q Specific information with regard to the racial composition
20 of a precinct and specific information with regard to election
21 results in that precinct.

22 A That's true for both EI and homogenous precinct analysis.

23 Q Now, you also testified that I believe with regard to the
24 Washington County precinct that's listed on that same page, the
25 Arcola City Hall was renamed Arcola Technology Center. Is that

1 our lunch break. It's 12:40 now. Let's be ready to start back
2 at 1:50. Court is in recess.

3 (RECESS)

4 THE COURT: Is there anything we need to take up
5 before we get the next witness?

6 MR. GREENBAUM: Not from the plaintiffs, Your Honor.

7 MR. CARDIN: Not from us, Your Honor.

8 THE COURT: All right. Plaintiff ready to proceed
9 with the next witness?

10 MS. CHAUDHURI: Good afternoon, Your Honor.

11 THE COURT: Good afternoon.

12 MS. CHAUDHURI: My name is Pooja Chaudhuri and I am an
13 attorney on behalf of the plaintiffs. I would like to call our
14 witness, Mr. Melvin Lawson, to the stand.

15 **MELVIN LAWSON,**

16 **having first been duly sworn, testified as follows:**

17 **DIRECT EXAMINATION**

18 BY MS. CHAUDHURI:

19 Q Good afternoon, Mr. Lawson. How are you?

20 A Fine.

21 Q Are you a registered voter?

22 A Yes, ma'am.

23 Q How long have you been registered to vote?

24 A Ever since I have been 18.

25 Q What address are you registered to vote at?

1 A I did not know at first. I didn't realize how the district
2 was shaped, but now that I am aware of it because I have been
3 looking at the maps and the charts and I see that it comes all
4 the way -- it comes from Cleveland all the way down and then it
5 jumps over to Yazoo and then it goes over in Madison County.

6 Q Are you -- are there challenges that black candidates have
7 in campaigning in District 22?

8 MR. CARDIN: Objection, Your Honor. Speculation.

9 THE COURT: Lay your foundation if you will.

10 BY MS. CHAUDHURI:

11 Q Have you worked on any political campaigns?

12 A Yes, ma'am, I have.

13 Q Whose political campaigns have you worked on?

14 A I have worked on my brother, he has run for supervisor up
15 in Bolivar County. Then I know Mrs. Willie Simmons personal
16 but because I goes in her office all the time, I know her kids,
17 and I know Senator Willie Simmons personally. And I know
18 Congressman Benny Thompson because I consider Benny Thompson a
19 personal friend.

20 But because I was in the area of Choctaw, it is an
21 undeveloped area and we have been talking with our supervisor
22 and everybody trying to get a water and sewage system down
23 there because we have had raw sewage and everything running
24 everywhere. But I got to talking to some cousins and friends
25 who knew Mr. Thomas, and we talked to Mr. Benny Thompson and he

1 sent somebody from his office down there.

2 And when he started the ball to rolling, he got us a sewage
3 system and a water system which did not cost us a dime, and he
4 got the sewage system hooked up to the system because he ran it
5 from every citizen's house. There was a lot of poor black
6 widow womens there, and they didn't have the funds to even much
7 get the sewage system hooked up from their house out into the
8 main system. But Mr. Thompson, he seen us getting a grant to
9 take care of it all.

10 Q All right. So let's go back to the political campaigns you
11 just mentioned. You worked on Rosie Simmons' campaign?

12 A Yes, ma'am.

13 Q You worked on Willie Simmons' campaign?

14 A Yes, ma'am.

15 Q You worked on your brother's campaign for supervisor?

16 A Yes, ma'am.

17 Q And you worked on Benny Thompson's campaign?

18 A Yes, ma'am.

19 Q What kind of activities were you involved in in all of
20 these campaigns?

21 A My brother's campaign, I hauled, passed out literature, put
22 out signs. And I basically kind of did the same for
23 Mrs. Simmons and Willie Simmons. Then on Benny Thompson, I
24 went to rallies. I even much walked the streets for
25 Mr. Thomas.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JOSEPH THOMAS, ET AL

PLAINTIFFS

VS.

CIVIL NO. 3:18CV441-CWR-FKB

PHIL BRYANT, ET AL

DEFENDANTS

**TRANSCRIPT OF TRIAL
VOLUME 2**

BEFORE THE HONORABLE CARLTON W. REEVES
UNITED STATES DISTRICT JUDGE
FEBRUARY 7, 2019
JACKSON, MISSISSIPPI

APPEARANCES:

FOR THE PLAINTIFFS: ROBERT B. MCDUFF
JON GREENBAUM
ARUSHA GORDON
POOJA CHAUDHURI
BETH L. ORLANSKI

FOR THE DEFENDANTS: TOMMIE S. CARDIN
B. PARKER BERRY
MICHAEL B. WALLACE
DOUGLAS T. MIRACLE

REPORTED BY: BRENDA D. WOLVERTON, RPR, FCRR, CRR
Mississippi CSR #1139

501 E. Court Street, Ste. 2.500
Jackson, Mississippi 39201
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1 would refer to as exogenous elections, that is to say elections
2 that have some probative value but perhaps according to a
3 political scientist, and I am not speaking as an expert, I am
4 simply saying this is my understanding of how they approach
5 this, not as much probative value as endogenous elections, that
6 is to say for the exact office in question, SD 22.

7 Q Dr. Morrison, let's move on over and there were I think
8 beginning on Page 7 of your report you made observations about
9 the Illustrative Plan 1 that was prepared by Mr. Cooper, and I
10 think you have also -- have you looked at Illustrative Plan 1
11 prepared by Mr. Cooper?

12 A I have.

13 Q Have you looked at Illustrative Plans 2 and 3 that he
14 prepared?

15 A I have just looked at one aspect of them.

16 Q Okay. In looking at all three of those plans,
17 Dr. Morrison, what -- do they have anything in common?

18 A Well, from my standpoint they have one very important thing
19 in common which is they look to me like a plan that focuses
20 exclusively on SD 22 and subordinates all other considerations
21 to a predominant emphasis on race. In other words, there is a
22 single-minded purpose in all three of them which is to increase
23 the African-American share of eligible voters in SD 22,
24 completely ignoring what effect it might have on any other
25 district.

1 Q But there is certainly nothing wrong with considering race
2 in drawing districts, is there?

3 A My understanding -- and I am not the lawyer here, but my
4 understanding is that the Supreme Court has frowned on or more
5 importantly more than frowned on a predominant emphasis on race
6 subordinating other redistricting considerations. And here, I
7 would say you can strip away all of the balancing things of
8 compactness, a little bit more compactness here, a little bit
9 less there, splitting one community, not splitting another
10 community, and just set all of that aside, there is a big red
11 flashing light here which this is a classic example of an
12 instance in which the plan -- each of these plans that
13 Mr. Cooper has constructed, in my opinion, could be regarded as
14 examples of packing and cracking in violation of the Voting
15 Rights Act.

16 And I personally, if somebody showed me these plans and
17 said this is one we came up with, could you -- would you
18 approve of it, I would say don't do that, this is going to be
19 viewed as violating the Voting Rights Act. It is a clear
20 example.

21 Q In looking at the illustrative plans, have you looked at
22 the effect that Mr. Cooper's plans would have on Senate
23 District 23?

24 A I have.

25 Q And based on your review of his plans, what effect in your

1 opinion would his illustrative plans have on Senate District
2 23?

3 A He transformed Senate District 23 from a district that has
4 some degree of influence, as I have used that term, to one in
5 which by my metric would have substantially less influence.

6 Q Mr. Greenbaum asked you about that during voir dire of your
7 qualifications, and describe for the court how you view whether
8 or not minority population has an influence in Senate
9 District 23.

10 A Well, if you have a district that is in the mid forties,
11 let's say, share -- African-American share of eligible voters,
12 my experience in drawing plans and hearing what lawyers say
13 about that level of concentration --

14 MR. GREENBAUM: I'm going to object on the grounds of
15 hearsay because he is talking about what lawyers have told him.

16 MR. CARDIN: Your Honor, he is testifying based on the
17 totality of his experience in working on a variety of Voting
18 Rights Act cases and his understanding that's derived as a
19 result of that.

20 THE COURT: I will give him some leeway. Objection
21 overruled.

22 BY MR. CARDIN:

23 Q Dr. Morrison, you may continue.

24 A So influence in the mid forties corresponds to some type of
25 influence. And, of course, it depends on context. When you --

1 whatever level of influence you have, if you reduce that by 10
2 percentage points or 11 percentage points, by my metric, that's
3 a substantial reduction in influence as I define it, and my
4 experience in drawing districts is that -- and I will speak in
5 terms of what happened -- what would happen or what has
6 happened if I explain that to do something one could cause the
7 influence measure to go down by 10 percentage points, the
8 reaction that I get from a lawyer is don't do that, we don't
9 want to do that because that would be -- that could be regarded
10 as violating the Voting Rights Act as an act of vote dilution.

11 That's the basis for my calling attention to this and
12 saying that I would caution any client in the strongest terms
13 not to consider a plan -- any of the plans that Mr. Cooper has
14 done simply because I think it would arouse concern with vote
15 dilution.

16 MR. CARDIN: Thank you, Dr. Morrison.

17 I tender the witness, Your Honor.

18 MR. GREENBAUM: Your Honor, would you mind if I took a
19 short bathroom break?

20 THE COURT: I had rather that you take it now. Yes.
21 I don't mind. We will take a 10-minute break.

22 (RECESS)

23 THE COURT: Ready to proceed?

24 MR. GREENBAUM: Thank you, Your Honor.

25 **CROSS-EXAMINATION**

EXHIBIT 20

MISSISSIPPI LEGISLATURE
2019 Regular Session
To: Rules
By: Senator(s) Tollison

Joint Resolution 202

A JOINT RESOLUTION TO AMEND CHAPTER 2234, LAWS OF 2012, TO REVISE THE COMPOSITION OF MISSISSIPPI STATE SENATE DISTRICTS 13 AND 22; AND FOR RELATED PURPOSES.

WHEREAS, the United States District Court for the Southern District of Mississippi ruled that Mississippi State Senate District 22 as currently configured diluted the voting strength of African-Americans and entered a final judgment to this effect; and

WHEREAS, in the case of Joseph Thomas, et al. v. Phil Bryant, et al., No. 19-60133 (5th Cir. Mar. 15, 2019), a panel of the United States Court of Appeals for the Fifth Circuit ruled on the defendant's motion for a stay and the motion for a stay was granted in part and denied in part; and

WHEREAS, a majority of the panel concluded that the Legislature should be afforded an opportunity to fix the vote dilution found by the district court; and

WHEREAS, a stay was entered for that purpose until April 3, 2019, and the candidate deadline for any districts whose lines are redrawn was extended to April 12, 2019:

NOW, THEREFORE, BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF MISSISSIPPI, that Chapter 2234, Laws of 2012, is amended as follows:

"BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF MISSISSIPPI, That the number of Senators shall be fifty-two (52) and shall be elected from fifty-two (52) districts, composed as follows:

DISTRICT 1

DeSoto County: *Aldens, Alpha Cockrum, Bridgetown, DeSoto Central, Endora, Hernando Central, Hernando East, Hernando West, *Horn

Lake South, Lake Cormorant, Lewisburg East, Lewisburg West, Love, Nesbit East, Nesbit West, Oak Grove and Walls Precincts.

DISTRICT 2

DeSoto County: *Aldens, Cherry Valley, Elmore, Greenbrook North, Greenbrook South, Horn Lake Central, Horn Lake East, Horn Lake Intermediate School, Horn Lake North, *Horn Lake South, Horn Lake West, Plum Point, Southhaven North, Southhaven South and Southhaven West Precincts.

DISTRICT 3

Benton County: All.

Pontotoc County: Bankhead, Bethel, Buchanan, Cherry Creek, Ecu, Friendship, Hoyle, Hurricane, Longview, Oak Hill, Pontotoc 1, Pontotoc 2, Pontotoc 3, Pontotoc 4, Pontotoc 5, Sherman, Turnpike, Woodland and Zion Precincts.

Union County: All.

DISTRICT 4

Alcorn County: All.

Tippah County: All.

DISTRICT 5

Itawamba County: Armory, Bounds, Clay, Copeland, Friendship, Fulton District 1 Courthouse, Fulton District 4 American Legion, Fulton District 5 Firestation, Mantachie, Mt. Gilead, Ozark, Pineville, Pleasanton, Ryan and Tilden Precincts.

Prentiss County: All.

Tishomingo County: All.

DISTRICT 6

Itawamba County: Centerville, Fawn Grove, Kirkville and Ratliff Precincts.

Lee County: Auburn, Baldwin, Beech Springs, Belden, Birmingham Ridge, Bissell, Blair, Corrona, Davis Box, East Heights, Eggville,

Euclautubba, Fellowship, Flowerdale, Friendship, Gilvo 1, Gilvo 5, Guntown, Hebron, Mooreville 1, Mooreville 5, Oak Hill, *Palmetto A & B, Pratts, Richmond, Saltillo, Tupelo 1, *Tupelo 2, *Tupelo 3, *Tupelo 4 North, Tupelo 5 and Unity Precincts.

DISTRICT 7

Itawamba County: Bigbee Fork, Cardsville, Carolina, Dorsey, Evergreen, Greenwood, Hampton, James Creek, New Salem, Oakland, Tremont, Turon and Wigginton Precincts.

Lee County: Brewer, Kedron, Nettleton, *Palmetto A & B, Petersburg, Plantersville, *Tupelo 2, *Tupelo 3, *Tupelo 4 North, Tupelo 4 South and Verona Precincts.

Monroe County: Aberdeen 3, Amory 1, Amory 2, Amory 5, Becker, Bigbee 1, Boyds, Central Grove, Darracott, Gibson, Hatley, Nettleton, North Aberdeen 4, Parham, Prairie, Smithville, South Aberdeen 4, Williams, Willis and Wren Precincts.

DISTRICT 8

Calhoun County: All.

Chickasaw County: All.

Lee County: Old Union, *Palmetto A & B, Pleasant Grove and Shannon Precincts.

Pontotoc County: Algoma, Beckham, Judah, North Randolph, Robbs, South Randolph, Springville, Thaxton, Toccopola and Troy Precincts.

Yalobusha County: Coffeeville 4, One North, One South, Three North West and Two Water Valley Precincts.

DISTRICT 9

Lafayette County: All.

Panola County: Batesville 3, Cold Springs, Coles Point, East Batesville 4, East Batesville 5, East Sardis, North Batesville A, North Springport and Pleasant Mount Precincts.

DISTRICT 10

Marshall County: Bethlehem, Chulahoma, Cornersville, Early Grove, Hudsonville, Laws Hill, Marianna, Mt. Pleasant, North Holly Springs District 1, North Holly Springs District 2, Potts Camp, Redbanks, Slayden, South Holly Springs, Wall Hill, Warsaw, Waterford, Watson and West Holly Springs Precincts.

Tate County: All.

DISTRICT 11

Coahoma County: Clarksdale 1-4, Clarksdale 2-4, Clarksdale 3-3, Clarksdale 3-4, Clarksdale 4-2, Clarksdale 4-3, Clarksdale 5-4, Jonestown and Lyons Precincts.

Panola County: Como, Courtland, Crenshaw, Curtis, Enon, Longtown, Macedonia-Concord, North Batesville B, Pleasant Grove, South Sardis, Tocowa and West Sardis Precincts.

Quitman County: All.

Tunica County: All.

DISTRICT 12

Bolivar County: Benoit, Beulah, Duncan/Alligator, East Rosedale, Gunnison, Pace, Scott, Stringtown and West Rosedale Precincts.

Coahoma County: Bobo, Cagle Crossing, Coahoma, Dublin, Farrell, Friar's Point, Lula, Rena Lara, Roundaway and Sherard Precincts.

Washington County: American Legion, Brent Center, Buster Brown Community Center, Christ Wesleyan Methodist Church, Elks Club, Extension Building, Grace Methodist Church, Greenville Industrial College, Leland Rotary Club, Metcalfe City Hall, Potter House Church, St. James Episcopal Church, Swiftwater Baptist Church, Tampa Drive and Wards Recreation Center Precincts.

DISTRICT 13

Bolivar County: Boyle, Choctaw, Cleveland Courthouse, Cleveland Eastgate, East Central Cleveland, East Cleveland, Longshot, Merigold, Mound Bayou, North Cleveland, Northwest Cleveland, Renova, Shaw, Shelby,

Skene, South Cleveland, West Central Cleveland, West Cleveland and Winstonville Precincts.

Sunflower County: * * * Boyer-Linn, Doddsville, Drew, Fairview-Hale, Indianola 3 North, Indianola 3 Northeast, Indianola 3 South, Indianola Southeast, Moorhead, Rome, Ruleville, Ruleville North, Sunflower 3, Sunflower 4 and Sunflower Plantation Precincts.

Tallahatchie County: Brazil, Charleston Beat 2, Sumner Beat 2, Sumner Beat 5, Tutwiler, Webb Beat 2 and Webb Beat 5 Precincts.

DISTRICT 14

Attala County: Berea, Carmack, Ethel, Hesterville, Liberty Chapel, McCool, Providence, Thompson, Williamsville and Zama Precincts.

Carroll County: All.

Grenada County: Elliott, Futheyville, Geeslin, Gore Springs, Grenada Box 1, Hardy, Mt. Nebo, Pleasant Grove, Providence and Tie Plant Precincts.

Leflore County: Money and *North Greenwood Precincts.

Montgomery County: Alva, Duck Hill, Mt. Pisgah, North Duck Hill, North Mt. Pisgah - Sweethome, North Winona, South Winona, Southeast Winona and West Winona Precincts.

Panola County: Eureka, Pope and South Springport Precincts.

Tallahatchie County: Cascilla, Charleston Beat 1, Charleston Beat 3, Enid, Leverette, Murphreesboro, Paynes, Rosebloom, Springhill and Teasdale Precincts.

Yalobusha County: Coffeeville 5, Oakland, Scobey, Skuna-Vanns, Sylva Rena and Tillatoba Precincts.

DISTRICT 15

Choctaw County: All.

Montgomery County: East Winona, Kilmichael, Lodi, Nations, North Kilmicheal, Poplar Creek and Stewart Precincts.

Oktibbeha County: Bradley, Central Starkville, Craig Springs, Double Springs, East Starkville, *Gillespie Street Center, Maben, North Longview, Northeast Starkville, Self Creek, South Adaton, South Longview, South Starkville, Sturgis and West Starkville Precincts.

Webster County: All.

DISTRICT 16

Clay County: All.

Lowndes County: Coleman A, Coleman B, Fairgrounds A, Fairgrounds D, Hunt A, Hunt B, Mitchell A, Mitchell B, Plum Grove C, Propst Park Community Hut, Union Academy A and *West Lowndes B Precincts.

Noxubee County: Brooksville, Central District 3, Cliftonville, Noxubee County Vo-Tech Center and Prairie Point Precincts.

Oktibbeha County: Bell Schoolhouse, Center Grove, *Gillespie Street Center, Hickory Grove, North Adaton, North Starkville 2, North Starkville 3, Oktoc, Osborn, Sessums and Southeast Oktibehha Precincts.

DISTRICT 17

Lowndes County: Air Base A, Air Base B, Air Base C, Air Base D, Air Base E, Artesia, Brandon A, Brandon B, Brandon C, Brandon D, Caledonia, Columbus High School A, Columbus High School B, Columbus High School C, Columbus High School D, Crawford A, Dowdle Gas Training Center B, Fairgrounds F, Fairgrounds G, Fairgrounds B, Fairgrounds C, Fairgrounds E, Hunt C, Lee Middle School, New Hope A, New Hope B, New Hope C, New Hope D, New Hope E, New Hope F, Plum Grove A, Plum Grove B, Rural Hill A, Rural Hill B, Rural Hill C, Sale A, Sale B, Sale C, Steens A, Steens B, Steens C, Trinity A, Trinity B, Union Academy B, Union Academy C, University A, University B, West Lowndes A and *West Lowndes B Precincts.

Monroe County: Athens, Bartahatchie, Greenwood Springs, Hamilton and Lackey Precinct.

DISTRICT 18

Leake County: East Carthage, Ebenezer, Edinburg, Freeny, Madden, North Carthage, Renfro, Salem, Singleton, South Carthage, Sunrise and Walnut Grove Precincts.

Neshoba County: All.

Winston County: East Winston, *Lovorn Tractor, Mars Hill, Nanih Waiya, New National Guard Armory, Noxapater, Shiloh, *Wathall and Zion Ridge Precincts.

DISTRICT 19

DeSoto County: Fairhaven, Hack's Cross, Ingram's Mill, Miller, Mineral Wells, Olive Branch North, Olive Branch South, Olive Branch West, Pleasant Hill North and Pleasant Hill South Precincts.

Marshall County: Barton, Byhalia, Cayce, North Cayce and Victoria Precincts.

DISTRICT 20

Rankin County: Castlewoods, Castlewoods West, Crossroads, East Crossgates, Fannin, Flowood, Grant's Ferry, Holbrook, Leesburg, Mullins, Northeast Brandon, Northshore, Oakdale, Pelahatchie, Pisgah, Reservoir East, Reservoir West, South Crossgates and West Crossgates Precincts.

DISTRICT 21

Attala County: Aponaug, East, McAdams, Newport, North Central, Northeast, Northwest, Possumneck, Sallis, South Central and Southwest Precincts.

Holmes County: Beat 4 Walden Chapel, Coxburg, Durant, Ebenezer, Goodman, Pickens and West Precincts.

Leake County: Conway, Good Hope, Lena, Ofahoma, Thomastown, West Carthage and Wiggins Precincts.

Madison County: *Bear Creek, Bible Church, Camden, Cameron, Canton Precinct 1, Canton Precinct 2, Canton Precinct 3, Canton Precinct 4, Canton Precinct 5, Canton Precinct 7, Cedar Grove, Couparle, Liberty,

Luther Branson School, Madison County Baptist Family Life Center, New Industrial Park, Ratliff Ferry and Sharon Precincts.

Yazoo County: Deasonville, East Midway, Harttown and West Midway Precincts.

DISTRICT 22

* * *

Humphreys County: Gooden Lake, Isola, Lake City, Louise, Midnight, Putnam, Silver City, Southeast Belzoni and Southwest Belzoni Precincts.

Madison County: *Bear Creek, Flora, *Gluckstadt, Magnolia Heights, Smith School, Virililia and Yandell Road Precincts.

Sharkey County: All.

Sunflower County: Indianola 2 East, Indianola 2 West and Inverness Precincts.

Washington County: Arcola City Hall, Darlove Baptist Church, Glen Allan Health Clinic, Hollandale City Hall and Leland Health Department Clinic Precincts.

Yazoo County: 3-1 West, 3-2 East, 3-3 Jonestown, 3-4 South, Benton, Carter, Eden, Fairview, Free Run, Fugates, Holly Bluff, Lake City, Valley, Ward 4, Ward 5 and Zion Precincts.

DISTRICT 23

Issaquena County: All.

Warren County: All.

Yazoo County: Center Ridge, District 4 Ward 2, Dover, East Bentonia, Mechanicsburg, Robinette, Satartia, Tinsley, Ward 2 and West Bentonia Precincts.

DISTRICT 24

Grenada County: Grenada Box 2, Grenada Box 3, Grenada Box 4, Grenada Box 5, Holcomb and Sweethome Precincts.

Holmes County: Acona, Cruger, Lexington Beat 1, Lexington Beat 4, Lexington Beat 5, Lexington East, Sandhill, Tchula and Thornton Precincts.

Humphreys County: Central Belzoni, Four Mile, North Belzoni and Northwest Belzoni Precincts.

Leflore County: Central Greenwood, East Greenwood, Minter City, Morgan City/Swiftown, MVSU, *North Greenwood, North Itta Bena, Northeast Greenwood, Rising Sun, Schlater, Sidon, South Greenwood, South Itta Bena, Southeast Greenwood, Southwest Greenwood and West Greenwood Precincts.

Tallahatchie County: Blue Cane, Glendora, Philipp, Tippo and Webb Beat 4 Precincts.

DISTRICT 25

Hinds County: 32, 33, 34, 35, 36, 44, 45 and 78 Precincts.

Madison County: *Bear Creek, Cobblestone, *Gluckstadt, Highland Colony Baptist Church, Madison 1, Madison 2, Madison 3, Main Harbor, NorthBay, Ridgeland Tennis Center, SunnyBrook, Trace Harbor, Victory Baptist Church and Whispering Lake Precincts.

DISTRICT 26

Hinds County: 41, 43, 46, 79, 80, 81, 82, 83, 84, 85, Bolton, Brownsville, Cynthia, Edwards, *Pinehaven, Pocahontas and Tinnin Precincts.

Madison County: Lorman-Cavalier, Ridgeland 1, Ridgeland 3, Ridgeland 4, Ridgeland First Methodist Church and Tougaloo Precincts.

DISTRICT 27

Hinds County: 11, 12, 13, 16, 21, 22, 23, 24, *26, 27, 28, 29, 30, 31, 38, 39, 40, 42, 54, 55, *56, 57, 60, 61, 62, 86, Clinton 1, Clinton 2, Clinton 3, Clinton 4, Clinton 5 and *Pinehaven Precincts.

DISTRICT 28

Hinds County: 18, 19, 20, 25, *26, 50, 51, 52, 53, *56, 58, 59, 63, 64, 66, 67, 68, 69, 70, 71, 73, 74, 75, 76, 87, 88, 89, 90, 92, 93, Clinton 6 and Jackson State Precincts.

DISTRICT 29

Hinds County: 1, 10, 14, 15, 17, 2, 37, 4, 47, 5, 6, 72, 77, 8, 9, 91, 94, 95, 96, 97, Byram 1, *Byram 2, Old Byram, Spring Ridge and Terry Precincts.

DISTRICT 30

Rankin County: Crest Park, Cunningham Heights, East Brandon, Eldorado, Liberty, *Monterey, North Brandon, North McLaurin, North Pearson, North Richland, Park Place, Patton Place, Pearl, South Brandon, South McLaurin, South Pearson, *South Richland, Springhill, West Brandon and West Pearl Precincts.

DISTRICT 31

Lauderdale County: Center Hill, Collinsville, Martin, Obadiah and West Lauderdale Precincts.

Newton County: All.

Scott County: All.

DISTRICT 32

Kemper County: All.

Lauderdale County: 10, 11, 12, 14, 15, 20, 3, 4, 5, 6, 7, 8, 9, Center Ridge, Daleville, East Lauderdale, East Marion, Marion and West Dalewood Precincts.

Noxubee County: Earl Nash Gym, Mashulaville, Savannah, Shuqualak and Sommerville Precincts.

Winston County: American Legion, County Agent, Fairground, *Lovorn Tractor, Mill Creek and *Walthall Precincts.

DISTRICT 33

Clarke County: All.

Lauderdale County: 1, 13, 16, 17, 18, 2, Alamucha, Andrews Chapel, Bailey, Causeyville, Clarkdale, Culpepper, East Bonita, Kewanee, Meehan, Mt. Gilead, New Lauderdale, Odom, Pickard, Prospect, Russell, Sageville, South Nellieburg, South Russell, Suqualena, Toomsuba, Valley, Vimville, Whynot and Zero Precincts.

DISTRICT 34

Forrest County: Davis School, Eaton School, Eatonville, Glendale, Jones School, Lillie Burney School, North Heights, Rowan School, Salvation Army, Walthall School and *Westside Precincts.

Jasper County: All.

Jones County: Blackwell, Bruce, Centerville, Cooks Avenue Community Center, Gitano, Hebron, Kingston Church, Lamar School, Laurel Courthouse, *Mauldin Community Center, National Guard Armory, *Nora Davis School, *North Laurel, Oak Park School, Old Health Department, *Pendorf, Rainey, Sandhill, Shelton, Soso and *Stainton Precincts.

DISTRICT 35

Copiah County: *Crystal Springs East Precinct.

Rankin County: Antioch, Cato, Clear Branch, Cleary, Dry Creek, East Steens Creek, Johns, Mayton, *Monterey, Mountain Creek, Puckett, Shiloh, *South Richland, Star and West Steens Creek Precincts.

Simpson County: All.

DISTRICT 36

Claiborne County: All.

Copiah County: Beauregard, Carpenter, Centerpoint, *Crystal Springs East, Crystal Springs North, Crystal Springs South, Crystal Springs West, Dentville, Gallman, Georgetown North, Hazlehurst East, Hazlehurst North, Hazlehurst South, Hazlehurst West and Martinsville Precincts.

Hinds County: *Byram 2, Cayuga, Chapel Hill, Dry Grove, Learned, Raymond 1, Raymond 2, St. Thomas, Utica 1 and Utica 2 Precincts.

Jefferson County: All.

DISTRICT 37

Adams County: Airport, Beau Pre, Bellemont, Carpenter, Concord, Convention Center, Courthouse, Duncan Park, Kingston, Liberty Park, Maryland, Morgantown, Oakland, Palestine and Washington Precincts.

Amite County: Crosby, East Fork, East Gloster, East Liberty, Homochitto, Liberty, New Zion, Oneil, Smithdale, South Liberty, Tangipahoa and Zion Hill Precincts.

Franklin County: All.

Pike County: 13, 14, 15, 20, 21, 22, 23, 25, 26, 27, 3 and 4 Precincts.

DISTRICT 38

Adams County: By-Pass Firestation, Foster Mound, Northside School, Pine Ridge and Thompson Precincts.

Amite County: Amite River, Ariel, Berwick, East Centreville, Gloster, Riceville, Street, Tickfaw and Walls Precincts.

Pike County: 1, 10, 11, 12, 16, 17, 18, 19, 2, 24, 28, 29, 30, 31, 32, 5, 6, 7, 8 and 9 Precincts.

Walthall County: Dexter, Dinan, District 3 Tylertown, Improve, Lexie, Mesa, Midway, North Kirklin, North Knoxo, Saint Paul, South Kirklin, South Knoxo and West Tylertown Precincts.

Wilkinson County: All.

DISTRICT 39

Copiah County: Georgetown South, Shady Grove, Strong Hope-Union and Wesson Precincts.

Lawrence County: All.

Lincoln County: All.

Walthall County: Darbun, District 4 Tylertown, District 4 West, East Tylertown, Enon, Hope, Sartinville and Varnell Precincts.

DISTRICT 40

Marion County: All.

Pearl River County: Anchor Lake/West Union, Buck Branch, Carriere, Ford's Creek, Henleyfield, Hide-A-Way North Hills, McNeill 3, McNeill 5, Mill Creek, Nicholson, Ozona, Picayune 1 East, Picayune 2, Picayune 4 West, Picayune 5, Pine Grove and Sycamore Precincts.

DISTRICT 41

Covington County: All.

Forrest County: Rawls Springs Precinct.

Jefferson Davis: All.

Lamar County: Rocky Branch and Sumrall Precincts.

Smith County: All.

DISTRICT 42

Forrest County: Barrontown-Macedonia, Leeville, Petal Masonic Lodge and West Petal Precincts.

Jones County: Antioch, Calhoun, Cameron Center, County Barn, Currie, Ellisville Court House, Erata, Glade School, Johnson, Landrum Community Center, Matthews, *Mauldin Community Center, Moselle, Myrick, *Nora Davis School, *North Laurel, Ovett, *Pendorf, Pinegrove, Pleasant Ridge, Powers Community Center, Roosevelt, Rustin, Sandersville Civic Center, Shady Grove, Sharon, South Jones, *Stainton, Tuckers and Union Precincts.

DISTRICT 43

George County: All.

Greene County: All.

Wayne County: All.

DISTRICT 44

Lamar County: Arnold Line, Baxterville, Bellevue, Breland, Greenville, Lake Serene, Lamar Park, Lumberton, Midway, Northeast Lamar, Oak Grove, Okahola, Oloh, Pine Grove, Purvis, Richburg, South Purvis, Wesley Manor and Yawn Precincts.

Pearl River County: Byrd Line, Gum Pond, Hickory Grove, Oak Hill and *Poplarville 3 Precincts.

DISTRICT 45

Forrest County: Blair High School, Brooklyn, Camp School, Carnes, Dantzler, Dixie, Dixie Pine-Central, East Petal, Highland Park, Maxie, Mclaurin, Pinecrest, Sunrise, Thames School, Timberton, USM Golf Course, *Westside and Woodley School Precincts.

Perry County: All.

DISTRICT 46

Hancock County: All.

Harrison County: 201, 212, 301, 304, 305, 306 and 315 Precincts.

DISTRICT 47

Jackson County: Gulf Hills, Larue, Latimer and St. Martin Precincts.

Pearl River County: Caesar, Derby, Picayune 1 South, Picayune 4 East, Poplarville 1, Poplarville 2, *Poplarville 3, Progress, Salem, Savannah, Steep Hollow, Whitesand 1 and Whitesand 2 Precincts.

Stone County: All.

DISTRICT 48

Harrison County: 206, 302, 303, 307, 308, 309, 310, 311, 312, 313, 314, *401, 402, 403, 404, 405, 407, 408, 409, 410, 411 and 412 Precincts.

DISTRICT 49

Harrison County: 202, 203, 204, 205, 207, 208, 209, 210, 211, 213, 214, 215, *401, 406, 503, 504, 505 and *510 Precincts.

DISTRICT 50

Harrison County: 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 501, 502, 506, 507, 508, 509 and *510 Precincts.

DISTRICT 51

Jackson County: Big Point, Carterville, Chico, Chico A, East Central, Eastside, Escatawpa, Escatawpa A, Escatawpa B, *Fountainbleau,

Gautier A, Griffin Heights, Gulf Hills A, Gulf Hills B, Helena, Hickory Hills A, Hwy 57, Hwy 57A, Jefferson Street, North Pascagoula, North Vancleave, North Vancleave A, Ocean Springs Civic Center, Orange Grove, Orange Grove A, Rec Center, Rec Center A, Red Hill, Red Hill A, South Vancleave, South Vancleave A, Sue Ellen, Union Hall, Wade A and YMBC/Dantzler Precincts.

DISTRICT 52

Jackson County: American Legion, Arlington, Arlington A, Eastlawn, Fair, Fair A, Fair B, *Fountainbleau, Gautier, Gautier B, Gautier C, Girl Scout, Girl Scout A, Gulf Park Estates, Gulf Park Estates A, Hickory Hill, Nazarene, Ocean Springs Armory, Ocean Springs Civic Center A, Ocean Springs Community Center, Pinecrest, Pinecrest A, Presbyterian, Presbyterian A, Presbyterian B, Sacred Heart and Villia Maria Precincts.

BE IT FURTHER RESOLVED, That partial or split precincts contained in this resolution are identified in this joint resolution by an asterisk (*) which shall precede its designation within the description of a district.

BE IT FURTHER RESOLVED, That, except as otherwise provided in this resolution, the Chairman and Vice Chairman of the Standing Joint Legislative Committee on Reapportionment shall file with the Secretary of State the Split Precinct Block List developed in conjunction with the plan contained in this joint resolution that details the portions of the partial or split precincts that are contained within a district by census tract and block number, and such document duly filed with the Secretary of State is hereby incorporated into and shall be construed to be an integral part of this joint resolution.

BE IT FURTHER RESOLVED, That the staff of the Standing Joint Legislative Committee on Reapportionment shall file with the Secretary of State the Split Precinct Block List developed in conjunction with the amendments Districts 13 and 22 contained in this joint resolution that

details the portions of the partial or split precincts, if any, that are contained within the districts by census tract and block number, and such document duly filed with the Secretary of State is hereby incorporated into and shall be construed to be an integral part of this joint resolution.

BE IT FURTHER RESOLVED, That the boundaries of the senatorial districts described above shall be:

(a) The boundaries of the counties listed above as such boundaries existed as of January 1, 2010; and

(b) The boundaries of the precincts, census tracts and blocks listed above as such boundaries are contained in the Census 2010 Tiger/Line Shapefiles released November 2010.

BE IT FURTHER RESOLVED, That this resolution shall be liberally construed to effectuate the purposes thereof and to redistrict the Senate of this state in compliance with constitutional requirements.

It is intended that this resolution and the districts described herein completely encompass all the area within the state. It is also intended that such districts contain all the inhabitants in this state. It is further intended that the redistricting provided for in this resolution result in the creation of districts which are substantially equal in population. It is also intended that no district shall include any of the area included within the description of any other district.

BE IT FURTHER RESOLVED, That if the districts described in this resolution do not carry out the purposes thereof, because of unintentional omissions; duplications; overlapping areas; erroneous nomenclature; lack of adequate maps or descriptions of political subdivisions, wards or other divisions thereof, or of their boundary lines, then the Secretary of State, at the request of the Chair of the Senate Elections Committee shall, by order, correct such omissions, overlaps, erroneous nomenclature or other defects in the description of

districts so as to accomplish the purposes and objectives of this resolution.

BE IT FURTHER RESOLVED, That in promulgating such orders, the Secretary of State, in addition to achieving equality in the population of districts and insuring that all areas of the state are completely and accurately encompassed in such districts, shall be guided by the following standards:

(a) In any instance in which there is a conflict between the description of a district as set out in this resolution and the map of the Senate Districts developed * * * in conjunction with the adopted redistricting plan, the map shall control; however, in instances in which the map is inconclusive, the criteria set out in paragraphs (b) through (f) shall control the resolution of any dispute or issue regarding the composition of any Senate District;

(b) Gaps in the description of any district shall be completed in a manner which results in a total description of that district in a manner which is consonant with the description of adjacent districts and results in complete contiguity of districts;

(c) Areas of the state included within the descriptions of more than one (1) district shall be allocated to the district having the lowest population;

(d) Areas of the state not included within the descriptions of any district shall be allocated to the adjacent district having the lowest population;

(e) In the event that the area subject to corrected description or allocation as provided in paragraphs (b), (c) and (d) of this clause is of such size or contains such population that its inclusion as a unit in any district would result in substantial disparity in the size, shape or population of such district, then the Secretary of

State may allocate portions of such area to two (2) or more districts; and

(f) In any allocation of area or correction of descriptions made pursuant to this resolution, the Secretary of State shall, consistent with the foregoing standards, preserve the contiguity and compactness of districts and avoid the unnecessary division of political subdivisions.

BE IT FURTHER RESOLVED, That copies of such orders shall be filed by the Secretary of State in his own office and in the offices of the affected commissioners of election and registrars. The Secretary of State may adopt reasonable rules regulating the procedure for applications for orders under this resolution in the manner of serving and filing any notice or copy of orders relating thereto. Upon the filing of such an order, the description of any affected district shall be deemed to have been corrected in the manner provided in such order to the full extent as if such correction had been contained in the original description set forth in this resolution.

BE IT FURTHER RESOLVED, That, except as otherwise provided in this resolution, the Standing Joint Legislative Committee on Reapportionment is directed to provide all information necessary to assist the counties in identifying the boundaries of the districts described in this resolution.

BE IT FURTHER RESOLVED, That the staff of the Standing Joint Legislative Committee on Reapportionment is directed to provide all information necessary to assist the counties in identifying the boundaries of the districts described in amended Districts 13 and 22.

BE IT FURTHER RESOLVED, That the qualifying deadline for Districts 13 and 22 as amended by this resolution shall be April 12, 2019, unless otherwise ordered by the court in the case of Joseph Thomas, et al. v. Phil Bryant, et al., No. 19-60133 (5th Cir. Mar. 15, 2019).

BE IT FURTHER RESOLVED, That the redistricting contained in this resolution shall supersede any prior redistricting, and any prior redistricting shall be null and void upon the date this resolution is effectuated.

BE IT FURTHER RESOLVED, That this resolution shall be placed in the editor's notes that follow Section 5-1-3, Mississippi Code of 1972.

BE IT FURTHER RESOLVED, That if any paragraph, sentence, clause, phrase or any part of this resolution is declared to be unconstitutional or void or if for any reason is declared to be invalid or of no effect, the remaining paragraphs, sentences, clauses, phrases or parts thereof shall be in no manner affected thereby but shall remain in full force and effect.

BE IT FURTHER RESOLVED, That this resolution shall take effect and be in force from and after its passage; however, in the event that the appellants prevail in the appeal of the case of Joseph Thomas, et al. v. Phil Bryant, et al., No. 19-60133 (5th Cir. Mar. 15, 2019), this resolution shall be repealed and the districts as originally configured in Chapter 2234, Laws of 2012, shall take effect."