

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

COMMON CAUSE GEORGIA, as an	)	
organization,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	
	)	File No. 1:18-CV-05102-AT
BRIAN KEMP, in his official capacity as	)	
Secretary of State of Georgia, <sup>1</sup>	)	
	)	
Defendant.	)	

**DEFENDANT’S SUBMISSION OF THE  
DECLARATION OF JOHN ALFORD**

Defendant Secretary of State Robyn A. Crittenden submits the attached Declaration of John Alford, Professor of Political Science at Rice University. As shown by Professor Alford’s Declaration, the information admitted into the record at the hearing on Plaintiff’s Motion for Temporary Restraining Order and Expedited Discovery is insufficient to determine whether the increase in provisional ballots in the 2018 election is statistically significant.

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<sup>1</sup> Defendant Kemp resigned from his position as Secretary of State, effective yesterday. Governor Deal has appointed Robyn A. Crittenden as the new Secretary of State for the State of Georgia.

Consequently, and because Plaintiff failed to produce any additional data, Plaintiff failed to meet its burden of showing any actual or potential harm to warrant the imposition of extraordinary relief.

Respectfully submitted this 9<sup>th</sup> day of November 2018.

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Special Assistant Attorney General

*Attorneys for Defendant*

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

COMMON CAUSE GEORGIA,	)	
as an organization,	)	CIVIL ACTION FILE
	)	
Plaintiff,	)	NO. 1:18-CV-05102-AT
	)	
v.	)	
	)	
BRIAN KEMP, in his official capacity	)	
as Secretary of State of Georgia,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF JOHN ALFORD**

Pursuant to 28 U.S.C. § 1746, John Alford, Professor of Political Science at Rice University, declares as follows:

1. I make this Declaration at the request of Defendant Secretary of State Brian Kemp with regard to the Plaintiff's the motion for a temporary restraining order in the above-styled matter of Common Cause Georgia, v. Brian Kemp (Civil Action No. 1:18-cv-05102-AT).

2. I am a Professor of Political Science at Rice University, and I have held that position since 2015. I was an Associate Professor at Rice University from 1985-

2015. I have a masters and Ph.D degree from the University of Iowa in political science. My curriculum vitae is attached to this declaration as “Exhibit 1.”

3. I have been qualified as an expert witness in litigation, including litigation that is in the State of Georgia.

4. I have considered the document attached to this declaration as “Exhibit 2.” My understanding is that the Defendant submitted the document as evidence in a hearing on a motion by the Plaintiff in the above-styled lawsuit.

5. I have also read the Court’s order, which allows the Defendant to submit an affidavit or declaration opinion on whether the data in Exhibit 2 shows regarding “whether or not there is a statistically significant increase in the percentage of provisional ballots cast, relative to the total number of ballots cast, as follows: (a) between the 2018 election and the 2016 election; and (b) between the 2018 election and the 2014 election.”

6. It is my opinion that the data provided is too narrow to determine whether the increase in provisional ballots between the 2018 election and the 2014 election and the 2018 election and the 2016 election is statistically significant.

I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 9th day of November, 2018.

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a cursive representation of the name 'John Alford'.

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JOHN ALFORD  
Professor of Political Science  
Rice University

# **EXHIBIT 1**

**John R. Alford**  
Curriculum Vitae  
January, 2018

Dept. of Political Science  
Rice University - MS-24  
P.O. Box 1892  
Houston, Texas 77251-1892  
713-348-3364  
jra@rice.edu

**Employment:**

Full Professor, Rice University, 2015 to present.  
Associate Professor, Rice University, 1985-2015.  
Assistant Professor, University of Georgia, 1981-1985.  
Instructor, Oakland University, 1980-1981.  
Teaching-Research Fellow, University of Iowa, 1977-1980.  
Research Associate, Institute for Urban Studies, Houston, Texas, 1976-1977.

**Education:**

Ph.D., University of Iowa, Political Science, 1981.  
M.A., University of Iowa, Political Science, 1980.  
M.P.A., University of Houston, Public Administration, 1977.  
B.S., University of Houston, Political Science, 1975.

**Books:**

*Predisposed: Liberals, Conservatives, and the Biology of Political Differences.* New York: Routledge, 2013. Co-authors, John R. Hibbing and Kevin B. Smith.

**Articles:**

“Intuitive ethics and political orientations: Testing moral foundations as a theory of political ideology.” with Kevin Smith, John Hibbing, Nicholas Martin, and Peter Hatemi. **American Journal of Political Science.** (April, 2017).

“The Genetic and Environmental Foundations of Political, Psychological, Social, and Economic Behaviors: A Panel Study of Twins and Families.” with Peter Hatemi, Kevin Smith, and John Hibbing. **Twin Research and Human Genetics.** (May, 2015.)

“Liberals and conservatives: Non-convertible currencies.” with John R. Hibbing and Kevin B. Smith. **Behavioral and Brain Sciences** (January, 2015).

“Non-Political Images Evoke Neural Predictors Of Political Ideology.” with Woo-Young Ahn, Kenneth T. Kishida, Xiaosi Gu, Terry Lohrenz, Ann Harvey, Kevin Smith, Gideon Yaffe, John Hibbing, Peter Dayan, P. Read Montague. **Current Biology.** (November, 2014).

“Cortisol and Politics: Variance in Voting Behavior is Predicted by Baseline Cortisol Levels.” with Jeffrey French, Kevin Smith, Adam Guck, Andrew Birnie, and John Hibbing. **Physiology & Behavior.** (June, 2014).



“Differences in Negativity Bias Underlie Variations in Political Ideology.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Negativity bias and political preferences: A response to commentators Response.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Genetic and Environmental Transmission of Political Orientations.” with Carolyn L. Funk, Matthew Hibbing, Kevin B. Smith, Nicholas R. Eaton, Robert F. Krueger, Lindon J. Eaves, John R. Hibbing. **Political Psychology**, (December, 2013).

“Biology, Ideology, and Epistemology: How Do We Know Political Attitudes Are Inherited and Why Should We Care?” with Kevin Smith, Peter K. Hatemi, Lindon J. Eaves, Carolyn Funk, and John R. Hibbing. **American Journal of Political Science**. (January, 2012)

“Disgust Sensitivity and the Neurophysiology of Left-Right Political Orientations.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **PlosONE**, (October, 2011).

“Linking Genetics and Political Attitudes: Re-Conceptualizing Political Ideology.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **Political Psychology**, (June, 2011).

“The Politics of Mate Choice.” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Journal of Politics**, (March, 2011).

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” with Peter Hatemi, John Hibbing, Sarah Medland, Matthew Keller, Kevin Smith, Nicholas Martin, and Lindon Eaves, **American Journal of Political Science**, (July, 2010).

“The Ultimate Source of Political Opinions: Genes and the Environment” with John R. Hibbing in **Understanding Public Opinion**, 3rd Edition eds. Barbara Norrander and Clyde Wilcox, Washington D.C.: CQ Press, (2010).

“Is There a ‘Party’ in your Genes” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Political Research Quarterly**, (September, 2009).

“Twin Studies, Molecular Genetics, Politics, and Tolerance: A Response to Beckwith and Morris” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (December, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

“Political Attitudes Vary with Physiological Traits” with Douglas R. Oxley, Kevin B. Smith, Matthew V. Hibbing, Jennifer L. Miller, Mario Scalora, Peter K. Hatemi, and John R. Hibbing, **Science**, (September 19, 2008).

“The New Empirical Biopolitics” with John R. Hibbing, **Annual Review of Political Science**, (June, 2008).

“Beyond Liberals and Conservatives to Political Genotypes and Phenotypes” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (June, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

“Personal, Interpersonal, and Political Temperaments” with John R. Hibbing, **Annals of the American Academy of Political and Social Science**, (November, 2007).

“Is Politics in our Genes?” with John R. Hibbing, **Tidsskriftet Politik**, (February, 2007).

“Biology and Rational Choice” with John R. Hibbing, **The Political Economist**, (Fall, 2005)

“Are Political Orientations Genetically Transmitted?” with John R. Hibbing and Carolyn Funk, **American Political Science Review**, (May, 2005). (The main findings table from this article has been reprinted in two college level text books - Psychology, 9th ed. and Invitation to Psychology 4th ed. both by Wade and Tavis, Prentice Hall, 2007).

“The Origin of Politics: An Evolutionary Theory of Political Behavior” with John R. Hibbing, **Perspectives on Politics**, (December, 2004).

“Accepting Authoritative Decisions: Humans as Wary Cooperators” with John R. Hibbing, **American Journal of Political Science**, (January, 2004).

“Electoral Convergence of the Two Houses of Congress” with John R. Hibbing, in **The Exceptional Senate**, ed. Bruce Oppenheimer, Columbus: Ohio State University Press, (2002).

“We’re All in this Together: The Decline of Trust in Government, 1958-1996.” in **What is it About Government that Americans Dislike?**, eds. John Hibbing and Beth Theiss-Morse, Cambridge: Cambridge University Press, (2001).

“The 2000 Census and the New Redistricting,” **Texas State Bar Association School Law Section Newsletter**, (July, 2000).

“Overdraft: The Political Cost of Congressional Malfeasance” with Holly Teeters, Dan Ward, and Rick Wilson, **Journal of Politics** (August, 1994).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 5th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1993).

"The 1990 Congressional Election Results and the Fallacy that They Embodied an Anti-Incumbent Mood" with John R. Hibbing, **PS** 25 (June, 1992).

"Constituency Population and Representation in the United States Senate" with John R. Hibbing. **Legislative Studies Quarterly**, (November, 1990).

"Editors' Introduction: Electing the U.S. Senate" with Bruce I. Oppenheimer. **Legislative Studies Quarterly**, (November, 1990).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 4th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1988). Reprinted in *The Congress of the United States, 1789-1989*, ed. Joel Silby, Carlson Publishing Inc., (1991), and in *The Quest for Office*, eds. Wayne and Wilcox, St. Martins Press, (1991).

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge. **The Western Political Quarterly** (December, 1986).

"Partisanship and Voting" with James Campbell, Mary Munro, and Bruce Campbell, in **Research in Micropolitics. Volume 1 - Voting Behavior**. Samuel Long, ed. JAI Press, (1986).

"Economic Conditions and Individual Vote in the Federal Republic of Germany" with Jerome S. Legge. **Journal of Politics** (November, 1984).

"Television Markets and Congressional Elections" with James Campbell and Keith Henry. **Legislative Studies Quarterly** (November, 1984).

"Economic Conditions and the Forgotten Side of Congress: A Foray into U.S. Senate Elections" with John R. Hibbing, **British Journal of Political Science** (October, 1982).

"Increased Incumbency Advantage in the House" with John R. Hibbing, **Journal of Politics** (November, 1981). Reprinted in *The Congress of the United States, 1789-1989*, Carlson Publishing Inc., (1991).

"The Electoral Impact of Economic Conditions: Who is Held Responsible?" with John R. Hibbing, **American Journal of Political Science** (August, 1981).

"Comment on Increased Incumbency Advantage" with John R. Hibbing, Refereed communication: **American Political Science Review** (March, 1981).

"Can Government Regulate Safety? The Coal Mine Example" with Michael Lewis-Beck, **American Political Science Review** (September, 1980).

### **Awards and Honors:**

CQ Press Award - 1988, honoring the outstanding paper in legislative politics presented at the 1987 Annual Meeting of the American Political Science Association. Awarded for "The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing.

### **Research Grants:**

National Science Foundation, 2009-2011, "Identifying the Biological Influences on Political Temperaments", with John Hibbing, Kevin Smith, Kim Espy, Nicolas Martin and Read Montague. This is a collaborative project involving Rice, University of Nebraska, Baylor College of Medicine, and Queensland Institute for Medical Research.

National Science Foundation, 2007-2010, "Genes and Politics: Providing the Necessary Data", with John Hibbing, Kevin Smith, and Lindon Eaves. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2007-2010, "Investigating the Genetic Basis of Economic Behavior", with John Hibbing and Kevin Smith. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the Queensland Institute of Medical Research.

Rice University Faculty Initiatives Fund, 2007-2009, "The Biological Substrates of Political Behavior". This is in assistance of a collaborative project involving Rice, Baylor College of Medicine, Queensland Institute of Medical Research, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2004-2006, "Decision-Making on Behalf of Others", with John Hibbing. This is a collaborative project involving Rice and the University of Nebraska.

National Science Foundation, 2001-2002, dissertation grant for Kevin Arceneaux, "Doctoral Dissertation Research in Political Science: Voting Behavior in the Context of U.S. Federalism."

National Science Foundation, 2000-2001, dissertation grant for Stacy Ulbig, "Doctoral Dissertation Research in Political Science: Sub-national Contextual Influences on Political Trust."

National Science Foundation, 1999-2000, dissertation grant for Richard Engstrom, "Doctoral Dissertation Research in Political Science: Electoral District Structure and Political Behavior."

Rice University Research Grant, 1985, Recent Trends in British Parliamentary Elections.

Faculty Research Grants Program, University of Georgia, Summer, 1982. Impact of Media Structure on Congressional Elections, with James Campbell.

## **Papers Presented:**

"The Physiological Basis of Political Temperaments" 6th European Consortium for Political Research General Conference, Reykjavik, Iceland (2011), with Kevin Smith, and John Hibbing.

"Identifying the Biological Influences on Political Temperaments" National Science Foundation Annual Human Social Dynamics Meeting (2010), with John Hibbing, Kimberly Espy, Nicholas Martin, Read Montague, and Kevin B. Smith.

"Political Orientations May Be Related to Detection of the Odor of Androstenone" Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, Amanda Balzer, Michael Gruszczynski, Carly M. Jacobs, and John Hibbing.

"Toward a Modern View of Political Man: Genetic and Environmental Transmission of Political Orientations from Attitude Intensity to Political Participation" Annual meeting of the American Political Science Association, Washington, DC (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

"Genetic and Environmental Transmission of Political Involvement from Attitude Intensity to Political Participation" Annual meeting of the International Society for Political Psychology, San Francisco, CA (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

"Are Violations of the EEA Relevant to Political Attitudes and Behaviors?" Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, and John Hibbing.

"The Neural Basis of Representation" Annual meeting of the American Political Science Association, Toronto, Canada (2009), with John Hibbing.

"Genetic and Environmental Transmission of Value Orientations" Annual meeting of the American Political Science Association, Toronto, Canada (2009), with Carolyn Funk, Kevin Smith, Matthew Hibbing, Pete Hatemi, Robert Krueger, Lindon Eaves, and John Hibbing.

“The Genetic Heritability of Political Orientations: A New Twin Study of Political Attitudes” Annual Meeting of the International Society for Political Psychology, Dublin, Ireland (2009), with John Hibbing, Cary Funk, Kevin Smith, and Peter K Hatemi.

“The Heritability of Value Orientations” Annual meeting of the Behavior Genetics Association, Minneapolis, MN (2009), with Kevin Smith, John Hibbing, Carolyn Funk, Robert Krueger, Peter Hatemi, and Lindon Eaves.

“The Ick Factor: Disgust Sensitivity as a Predictor of Political Attitudes” Annual meeting of the Midwest Political Science Association, Chicago, IL (2009), with Kevin Smith, Douglas Oxley Matthew Hibbing, and John Hibbing.

“The Ideological Animal: The Origins and Implications of Ideology” Annual meeting of the American Political Science Association, Boston, MA (2008), with Kevin Smith, Matthew Hibbing, Douglas Oxley, and John Hibbing.

“The Physiological Differences of Liberals and Conservatives” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Kevin Smith, Douglas Oxley, and John Hibbing.

“Looking for Political Genes: The Influence of Serotonin on Political and Social Values” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Peter Hatemi, Sarah Medland, John Hibbing, and Nicholas Martin.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the American Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Matthew Keller, Nicholas Martin, Sarah Medland, and Lindon Eaves.

“Factorial Association: A generalization of the Fulker between-within model to the multivariate case” Annual meeting of the Behavior Genetics Association, Amsterdam, The Netherlands (2007), with Sarah Medland, Peter Hatemi, John Hibbing, William Coventry, Nicholas Martin, and Michael Neale.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the Midwest Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Nicholas Martin, and Lindon Eaves.

“Getting from Genes to Politics: The Connecting Role of Emotion-Reading Capability” Annual Meeting of the International Society for Political Psychology, Portland, OR, (2007.), with John Hibbing.

“The Neurological Basis of Representative Democracy.” Hendricks Conference on Political Behavior, Lincoln, NE (2006), with John Hibbing.

“The Neural Basis of Representative Democracy” Annual meeting of the American Political Science Association, Philadelphia, PA (2006), with John Hibbing.

“How are Political Orientations Genetically Transmitted? A Research Agenda” Annual meeting of the Midwest Political Science Association, Chicago Illinois (2006), with John Hibbing.

“The Politics of Mate Choice” Annual meeting of the Southern Political Science Association, Atlanta, GA (2006), with John Hibbing.

“The Challenge Evolutionary Biology Poses for Rational Choice” Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing and Kevin Smith.

"Decision Making on Behalf of Others" Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the Midwest Political Science Association, Chicago Illinois (2005), with John Hibbing and Carolyn Funk.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the American Political Science Association, Chicago Illinois (2004), with John Hibbing and Carolyn Funk.

"Accepting Authoritative Decisions: Humans as Wary Cooperators" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2002), with John Hibbing

"Can We Trust the NES Trust Measure?" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2001), with Stacy Ulbig.

"The Impact of Organizational Structure on the Production of Social Capital Among Group Members" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Allison Rinden.

"Isolating the Origins of Incumbency Advantage: An Analysis of House Primaries, 1956-1998" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Kevin Arceneaux.

"The Electorally Indistinct Senate," Norman Thomas Conference on Senate Exceptionalism, Vanderbilt University; Nashville, Tennessee; October (1999), with John R. Hibbing.

"Interest Group Participation and Social Capital" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (1999), with Allison Rinden.

"We're All in this Together: The Decline of Trust in Government, 1958-1996." The Hendricks Symposium, University of Nebraska, Lincoln. (1998)

"Constituency Population and Representation in the United States Senate," Electing the Senate; Houston, Texas; December (1989), with John R. Hibbing.

"The Disparate Electoral Security of House and Senate Incumbents," American Political Science Association Annual Meetings; Atlanta, Georgia; September (1989), with John R. Hibbing.

"Partisan and Incumbent Advantage in House Elections," Annual Meeting of the Southern Political Science Association (1987), with David W. Brady.

"Personal and Party Advantage in U.S. House Elections, 1846-1986" with David W. Brady, 1987 Social Science History Association Meetings.

"The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing, 1987 Annual Meeting of the American Political Science Association.

"A Comparative Analysis of Economic Voting" with Jerome Legge, 1985 Annual Meeting of the American Political Science Association.

"An Analysis of Economic Conditions and the Individual Vote in Great Britain, 1964-1979" with Jerome Legge, 1985 Annual Meeting of the Western Political Science Association.

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge, 1985 Annual Meeting of the Southwestern Social Science Association.

"Economic Conditions and the Individual Vote in the Federal Republic of Germany" with Jerome S. Legge, 1984 Annual Meeting of the Southern Political Science Association.

"The Conditions Required for Economic Issue Voting" with John R. Hibbing, 1984 Annual Meeting of the Midwest Political Science Association.

"Incumbency Advantage in Senate Elections," 1983 Annual Meeting of the Midwest Political Science Association.

"Television Markets and Congressional Elections: The Impact of Market/District Congruence" with James Campbell and Keith Henry, 1982 Annual Meeting of the Southern Political Science Association.

"Economic Conditions and Senate Elections" with John R. Hibbing, 1982 Annual Meeting of the Midwest Political Science Association. "Pocketbook Voting: Economic Conditions and Individual Level Voting," 1982 Annual Meeting of the American Political Science Association.

"Increased Incumbency Advantage in the House," with John R. Hibbing, 1981 Annual Meeting of the Midwest Political Science Association.

### **Other Conference Participation:**

Roundtable Participant – Closing Round-table on Biopolitics; UC Merced Conference on Bio-Politics and Political Psychology, Merced, CA.

Roundtable Participant “Genes, Brains, and Core Political Orientations” 2008 Annual Meeting of the Southwestern Political Science Association, Las Vegas.

Roundtable Participant “Politics in the Laboratory” 2007 Annual Meeting of the Southern Political Science Association, New Orleans.

Short Course Lecturer, "What Neuroscience has to Offer Political Science" 2006 Annual Meeting of the American Political Science Association.

Panel chair and discussant, "Neuro-scientific Advances in the Study of Political Science" 2006 Annual Meeting of the American Political Science Association.

Presentation, “The Twin Study Approach to Assessing Genetic Influences on Political Behavior” Rice Conference on New Methods for Understanding Political Behavior, 2005.

Panel discussant, "The Political Consequences of Redistricting," 2002 Annual Meeting of the American Political Science Association.

Panel discussant, "Race and Redistricting," 1999 Annual Meeting of the Midwest Political Science Association.

Invited participant, “Roundtable on Public Dissatisfaction with American Political Institutions”, 1998 Annual Meeting of the Southwestern Social Science Association.

Presentation, “Redistricting in the ‘90s,” Texas Economic and Demographic Association, 1997.

Panel chair, "Congressional Elections," 1992 Annual Meeting of the Southern Political Science Association.

Panel discussant, "Incumbency and Congressional Elections," 1992 Annual Meeting of the American Political Science Association.

Panel chair, "Issues in Legislative Elections," 1991 Annual Meeting of the Midwest Political Science Association.

Panel chair, "Economic Attitudes and Public Policy in Europe," 1990 Annual Meeting of the Southern Political Science Association

Panel discussant, “Retrospective Voting in U.S. Elections,” 1990 Annual Meeting of the Midwest Political Science Association.

Co-convener, with Bruce Oppenheimer, of Electing the Senate, a national conference on the NES 1988 Senate Election Study. Funded by the Rice Institute for Policy Analysis, the University of Houston Center for Public Policy, and the National Science Foundation, Houston, Texas, December, 1989.

Invited participant, Understanding Congress: A Bicentennial Research Conference, Washington, D.C., February, 1989.

Invited participant--Hendricks Symposium on the United States Senate, University of Nebraska, Lincoln, Nebraska, October, 1988

Invited participant--Conference on the History of Congress, Stanford University, Stanford, California, June, 1988.

Invited participant, “Roundtable on Partisan Realignment in the 1980's”, 1987 Annual Meeting of the Southern Political Science Association.

## **Professional Activities:**

### **Other Universities:**

Invited Speaker, Annual Allman Family Lecture, Dedman College Interdisciplinary Institute, Southern Methodist University, 2016.

Invited Speaker, Annual Lecture, Psi Sigma Alpha – Political Science Dept., Oklahoma State University, 2015.

Invited Lecturer, Department of Political Science, Vanderbilt University, 2014.

Invited Speaker, Annual Lecture, Psi Kappa -the Psychology Club at Houston Community College, 2014.



Invited Speaker, Graduate Student Colloquium, Department of Political Science, University of New Mexico, 2013.

Invited Keynote Speaker, Political Science Alumni Evening, University of Houston, 2013.

Invited Lecturer, Biology and Politics Masters Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2010.

Invited Lecturer, Biology and Politics Senior Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2008.

Visiting Fellow, the Hoover Institution, Stanford University, 2007.

Invited Speaker, Joint Political Psychology Graduate Seminar, University of Minnesota, 2007.

Invited Speaker, Department of Political Science, Vanderbilt University, 2006.

**Member:**

Editorial Board, Journal of Politics, 2007-2008.

Planning Committee for the National Election Studies' Senate Election Study, 1990-92.

Nominations Committee, Social Science History Association, 1988

**Reviewer for:**

American Journal of Political Science  
American Political Science Review  
American Politics Research  
American Politics Quarterly  
American Psychologist  
American Sociological Review  
Canadian Journal of Political Science  
Comparative Politics  
Electoral Studies  
Evolution and Human Behavior  
International Studies Quarterly  
Journal of Politics  
Journal of Urban Affairs  
Legislative Studies Quarterly  
National Science Foundation  
PLoS ONE  
Policy Studies Review  
Political Behavior  
Political Communication  
Political Psychology

Political Research Quarterly  
Public Opinion Quarterly  
Science  
Security Studies  
Social Forces  
Social Science Quarterly  
Western Political Quarterly

### **University Service:**

Member, University Parking Committee, 2016-2017.

Member, University Benefits Committee, 2013-2016.

Internship Director for the Department of Political Science, 2004-2017.

Member, University Council, 2012-2013.

Invited Speaker, Rice Classroom Connect, 2016.

Invited Speaker, Glasscock School, 2016.

Invited Speaker, Rice Alumni Association, Austin, 2016.

Invited Speaker, Rice Alumni Association, New York City, 2016.

Invited Speaker, Rice TEDxRiceU , 2013.

Invited Speaker, Rice Alumni Association, Atlanta, 2011.

Lecturer, Advanced Topics in AP Psychology, Rice University AP Summer Institute, 2009.

Scientia Lecture Series: "Politics in Our Genes: The Biology of Ideology" 2008

Invited Speaker, Rice Alumni Association, Seattle, San Francisco and Los Angeles, 2008.

Invited Speaker, Rice Alumni Association, Austin, Chicago and Washington, DC, 2006.

Invited Speaker, Rice Alumni Association, Dallas and New York, 2005.

Director: Rice University Behavioral Research Lab and Social Science Computing Lab, 2005-2006.

University Official Representative to the Inter-university Consortium for Political and Social Research, 1989-2012.

Director: Rice University Social Science Computing Lab, 1989-2004.

Member, Rice University Information Technology Access and Security Committee, 2001-2002

Rice University Committee on Computers, Member, 1988-1992, 1995-1996; Chair, 1996-1998, Co-chair, 1999.

Acting Chairman, Rice Institute for Policy Analysis, 1991-1992.

Divisional Member of the John W. Gardner Dissertation Award Selection Committee, 1998

Social Science Representative to the Educational Sub-committee of the Computer Planning Committee, 1989-1990.

Director of Graduate Admissions, Department of Political Science, Rice University, 1986-1988.

Co-director, Mellon Workshop: Southern Politics, May, 1988.

Guest Lecturer, Mellon Workshop: The U.S. Congress in Historical Perspective, May, 1987 and 1988.

Faculty Associate, Hanszen College, Rice University, 1987-1990.

Director, Political Data Analysis Center, University of Georgia, 1982-1985.

### **External Service:**

Expert Witness, Georgia NAACP v. State of Georgia, racially polarized voting analysis, 2018.

Expert Witness, Arismendez v. Coastal Bend College, racially polarized voting analysis, 2017.

Expert Witness, United States v. City of Eastpoint, racially polarized voting analysis, 2017.

Expert Witness, Georgia NAACP v. Gwinnett County, racially polarized voting analysis, 2017.

The Japanese Consulate of Houston - Texas and U.S. Politics, 1987-2017.

Expert Witness for the State of Texas, Lopez, et al v. Abbott, a challenge to the current system of statewide at-large elections for the Texas Supreme Court and the Texas Court of Criminal Appeals, including election analysis, and racially polarized voting analysis, 2017.

Expert witness for the State of Texas, Perez, et al v State of Texas (and consolidated cases), challenge to adopted Texas election districts for the US Congress and the Texas House of Representatives, 2011-2017.

Expert Witness for Coppell ISD, Jain v. Coppell ISD, racially polarized voting analysis, 2016.

Consultant, City of Clute, Texas – Demographic analysis and redrawing of election districts, 2015.

Expert Witness for Carrollton-Farmers Branch ISD, Ramos v. Carrollton-Farmers Branch ISD, racially polarized voting analysis, 2015.

Expert Witness for Coahoma County, Columbus Partee, et al. v. Coahoma County, Mississippi, racially polarized voting analysis, 2015.

Expert Witness for the State of Louisiana, Terrebonne Parish NAACP v. Jindal, racially polarized voting analysis, 2015.

Expert Witness for the City of Pasadena, Patino v. City of Pasadena, racially polarized voting analysis, 2015.

Expert Witness for the City of St. Gabriel, York v. City of St. Gabriel, racially polarized voting analysis, 2014.

Consultant, Houston ISD – Incorporation of North Forest ISD, and the consequent redrawing of all nine board member election districts including demographic analysis, board and public hearing presentations and support for pre-clearance submission, 2014.

Expert Witness for Grand Prairie ISD, Rodriguez v. Grand Prairie ISD, racially polarized voting analysis, 2014.

Expert Witness for Irving ISD, Benevides, v Irving ISD, racially polarized voting analysis, 2014.

Expert Witness for Pasadena ISD, Garcia-Sonnier et al v., racially polarized voting analysis, 2013.

Expert witness for the City of Yakima, Montes v. City of Yakima, challenge to Yakima, Washington At-Large City Council Elections, 2012.

Consultant, Lamar ISD – redrawing of all board member election districts including demographic analysis and redrawing of election districts, board and public hearing presentations, and support for pre-clearance submission, 2012.

Expert witness for Harris Co, Rodriguez, et. al. v., challenge to adopted Harris County Commissioners’ Court precincts, 2011.

Consultant, City of Baytown – redrawing of all board member election districts including demographic analysis and redrawing of election districts, board and public hearing presentations, and support for pre-clearance submission, 2011.

Consultant, Goose Creek ISD – redrawing of all board member election districts including demographic analysis and redrawing of election districts, board and public hearing presentations, and support for pre-clearance submission, 2011.

Consultant, San Antonio Water System – Analysis of preclearance issues related to merger with BexarMet Water Authority, 2011.

Expert witness for the State of Texas, Texas v US, preclearance suit for Texas statewide districts, 2011.\*

Expert witness for the State of Texas, Davis v Perry (and consolidated cases), challenge to adopted Texas Senate districts, 2011.

Expert witness for the State of Texas, Perez, et al v State of Texas (and consolidated cases), challenge to adopted Texas statewide districts, 2011-2017.

Expert witness, Fabela, et al. v City of Farmers Branch, Farmers Branch city council at large district challenge, 2011.

Expert Witness, El Paso Apartment Owners Assoc. v City of El Paso, analysis of racial patterns in housing occupancy, 2009.

Expert Witness, Benevides, v Irving ISD, racially polarized voting analysis, 2008-2009.

Expert Witness, Benevides, v City of Irving, racially polarized voting analysis, 2008-2009.

Expert Witness, Reyes, et. al. v City of Farmers Branch, racially polarized voting analysis, 2007-2008.

Expert witness, The York Group v. Horizon Casket Group, Survey of country of origin effects on buying decisions, 2007.

Expert witness, Bosquez, et al v City of Amarillo, Amarillo city council at large district challenge, 2006.

Expert witness, Bosquez, et al v Amarillo Community College, Amarillo Community College at large district challenge, 2006.

Expert witness, NAACP, et. al. v St. Landry Parish., et. al., St. Landry Parish, Louisiana council and school board districts, 2004.

Consulting expert for Henry Cuellar, Rodriguez. v. Cuellar, Texas congressional primary disputed ballot recount, 2004.

Expert witness, Sessions, et. al. v Perry., et. al., challenge to redrawn Texas congressional districts, 2003.

Consultant, Texas Democratic congressional delegation, Texas congressional redistricting, 2003.

Expert witness, Rodriguez, et. al. v Bexar Co., et. al., Bexar Co. JP districts, 2003.

Consultant, City of San Marcos, racially polarized voting analysis, 2002

Expert witness, Martinez, et. al. v Bush, et. al., Florida congressional districts, 2002.

Expert witness, Arrington, et. al. v Wendelberger, et. al., Wisconsin congressional districts, 2002.

Expert witness, Leyva, et. al. v. Bexar County Republican Party, Impact of polling place changes in the Bexar County Republican Primary, 2002.

Expert witness, Branch. v Clark, and Smith v. Clark, Mississippi congressional districts, 2001.

Expert witness, Jepsen et. el. v Vigil-Giron, et. al., New Mexico state legislative districts, 2001.

State of Texas – Consultant and expert witness (Balderas v. Texas and associated cases) U. S. congressional redistricting, 2001

State of Texas – Consultant and expert witness for State Board of Education redistricting, 2001

Texas Legislative Redistricting Board – Consultant on State legislative redistricting, 2001.

City of Baytown – Demographic analysis and redrawing of election districts, 2001.

Goose Creek Independent School District - – Demographic analysis and redrawing of election districts, 2001.

Pasadena Independent School District – Appeal to the United States Supreme Court, Perez v. Pasadena Independent School District, 1999.

Greater Harris County 9-1-1 – Service utilization and mapping, 1999-2000.

Amarillo Independent School District - Expert witness, Reynoso, et. al. v. Amarillo Independent School District et. al., 1998.

Vaden, Eickenroht, and Thompson - Expert witness on product trade dress survey, General Shelters of Texas v. Quietaire Cooling Inc., 1998.

Pasadena Chamber of Commerce – Survey of voter attitudes on infrastructure, 1998.

East Bernard Independent School District - Single member district demographic analysis, 1997.

City of Houston - Expert witness, Chen, et. al. v. City of Houston (race-based districting), 1997.

Texas A&M University - Geographic analysis and expert witness, ROPL v. Texas A&M et. al. (environmental racism), 1997.

Waste Control Specialists - Venue change survey and expert witness, Waste Control Specialists v. Envirocare of Texas, et. al., 1997

Houston Community College - Districting analysis, 1997

Greater Harris County 9-1-1 - Database construction, survey analysis, and policy evaluation for the multi-county 9-1-1 service area, 1991-1997.

Beirne, Maynard, and Parsons - Jury experiments for Foreman v. Northwestern Steel and Wire, 1997.

Pasadena Independent School District - Polling place expansion and new election precinct construction, 1997-1998.

City of Houston - Expert witness, Harris, et. al. v. City of Houston (Council redistricting and VRA implications of the Kingwood annexation), 1997.

Sharyland Independent School District - Expert witness, LULAC v. Sharyland Independent School District et. al., 1996.

City of Plainview, Texas - Expert witness, LULAC v. City of Plainview, 1996.

Iraan-Sheffield Independent School District - Demographic analysis, LULAC v. Iraan-Sheffield Independent School District et. al., 1996.

Navarro Independent School District - Demographic analysis, LULAC v. Navarro Independent School District, 1996.

Alief Independent School District - Demographic analysis, 1996.

Spring Branch Independent School District - Expert witness, Ana Marie Cantu et. al. v. Spring Branch Independent School District, 1996.

Webster, Texas - Annexation demographics, 1996.

Chevron Oil - Expert witness testimony and a survey of attitudes related to residential property valuation, Simmons, et. al. v. Chevron USA, et. al., 1995-97.

Liberty Tree - Research design for the evaluation of an experimental program to increase participation in primaries and caucuses, 1995.

Roscoe Independent School District - Election analysis and expert witness testimony, Garcia v. Roscoe Independent School District, 1995.

US Attorney's Office, Jury pool analysis and expert witness testimony, United States v. Teresa Rodriguez, 1995.

Pasadena Independent School District - Election analysis and expert witness testimony, Perez v. Pasadena Independent School District, 1995.

Beirne, Maynard, and Parsons - Jury experiments for Burris, et. al. v. Dow Corning, 1994.

Haskell, Texas - Demographic analysis and city council redistricting, 1994.

Stamford, Texas - Demographic analysis and city council redistricting, 1994.

Galveston Independent School District - Demographic analysis and school board redistricting, 1993.

Ft. Bend Independent School District - Demographic analysis and expert witness testimony, Rollins v. Fort Bend Independent School District, 1993.

La Marque Independent School District - Demographic analysis and school board redistricting, 1993.

China, Texas - Demographic analysis and expert witness testimony on city council redistricting, 1992.

Expert Witness, crossover voting patterns in the 29th congressional district, Reyes v. Green, 1992.

Butler and Binion - Jury experiments for Challenger Minerals v. Transco, 1991.

Houston Lighting and Power - Time series analysis of safety policy, 1990-91

Rosenberg, Texas - Demographic analysis and city council redistricting, 1991.

Clute, Texas - Demographic analysis and city council redistricting, 1991.

Hitchcock, Texas - Demographic analysis and city council redistricting, 1991.

Baytown, Texas - Demographic analysis and city council redistricting, 1991.

La Marque, Texas - Demographic analysis and city council redistricting, 1991.

Fort Bend County, Texas - LULAC v. Clements, challenge to the multi-member judicial election system in the county, 1989.

Texas Attorney General - LULAC v. Clements, challenge to the multi-member judicial election system in six Texas counties, 1989.

Committee to Re-Elect Chief Justice Phillips - voting alignments in the Texas Supreme Court, 1988.

Expert Witness, alternative election systems, in Dillard v. Crenshaw County, et. al., U.S. District Court for the Middle District of Alabama, 1988.

Department of Community Affairs, State of Georgia - statewide surveys of local government finance and personnel policy, 1983.

Carl Vinson Institute of Government - computers and data base management, 1983.

Colby College, Waterville, Maine, computers and undergraduate social science instruction, 1982.



# **EXHIBIT 2**

	2018 Provisional Ballots	2016 Provisional Ballots	2014 Provisional Ballots
APPLING COUNTY	13	3	4
ATKINSON COUNTY	2	7	9
BACON COUNTY	11	19	4
BAKER COUNTY	10	14	9
BALDWIN COUNTY	16	22	10
BANKS COUNTY	4	5	1
BARROW COUNTY	9	1	9
BARTOW COUNTY	86	91	74
BEN HILL COUNTY	50	36	3
BERRIEN COUNTY	10	50	11
BIBB COUNTY	419	354	112
BLECKLEY COUNTY	5	12	5
BRANTLEY COUNTY	29	9	6
BROOKS COUNTY	69	87	31
BRYAN COUNTY	24	13	6
BULLOCH COUNTY	224	130	19
BURKE COUNTY	6	2	0
BUTTS COUNTY	0	4	0
CALHOUN COUNTY	0	1	4
CAMDEN COUNTY	11	48	9
CANDLER COUNTY	3	15	9
CARROLL COUNTY	291	319	96
CATOOSA COUNTY	40	24	16
CHARLTON COUNTY	13	13	5
CHATHAM COUNTY	329	224	100
CHATTAHOOCHEE COUNTY	34	6	2
CHATTOOGA COUNTY	34	24	7
CHEROKEE COUNTY	144	45	64
CLARKE COUNTY	198	239	186
CLAY COUNTY	2	4	1
CLAYTON COUNTY	888	433	139
CLINCH COUNTY	5	7	2
COBB COUNTY	2202	1565	1656

COFFEE COUNTY	10	21	7
COLQUITT COUNTY	17	21	6
COLUMBIA COUNTY	89	53	14
COOK COUNTY	0	2	1
COWETA COUNTY	38	27	20
CRAWFORD COUNTY	3	11	8
CRISP COUNTY	35	27	6
DADE COUNTY	13	5	13
DAWSON COUNTY	11	26	18
DECATUR COUNTY	188	129	10
DEKALB COUNTY	3008	1159	1002
DODGE COUNTY	8	3	0
DOOLY COUNTY	6	25	1
DOUGHERTY COUNTY	355	419	106
DOUGLAS COUNTY	145	84	47
EARLY COUNTY	4	1	3
ECHOLS COUNTY	0	0	0
EFFINGHAM COUNTY	8	13	17
ELBERT COUNTY	79	80	14
EMANUEL COUNTY	15	38	6
EVANS COUNTY	2	0	1
FANNIN COUNTY	23	24	8
FAYETTE COUNTY	81	85	31
FLOYD COUNTY	200	200	119
FORSYTH COUNTY	90	207	83
FRANKLIN COUNTY	3	1	2
FULTON COUNTY	3670	2528	3573
GILMER COUNTY	39	15	16
GLASCOCK COUNTY	2	0	0
GLYNN COUNTY	183	163	56
GORDON COUNTY	127	104	44
GRADY COUNTY	20	33	9
GREENE COUNTY	15	30	24
GWINNETT COUNTY	2427	2347	1702

HABERSHAM COUNTY	9	14	50
HALL COUNTY	370	136	71
HANCOCK COUNTY	14	14	20
HARALSON COUNTY	4	21	5
HARRIS COUNTY	47	34	33
HART COUNTY	14	6	0
HEARD COUNTY	8	2	1
HENRY COUNTY	339	446	136
HOUSTON COUNTY	150	301	89
IRWIN COUNTY	22	26	3
JACKSON COUNTY	59	68	44
JASPER COUNTY	62	6	2
JEFF DAVIS COUNTY	0	2	1
JEFFERSON COUNTY	45	58	26
JENKINS COUNTY	26	38	3
JOHNSON COUNTY	0	0	1
JONES COUNTY	16	3	8
LAMAR COUNTY	64	48	14
LANIER COUNTY	5	9	4
LAURENS COUNTY	41	9	15
LEE COUNTY	19	13	11
LIBERTY COUNTY	10	34	6
LINCOLN COUNTY	4	5	15
LONG COUNTY	10	26	12
LOWNDES COUNTY	1174	1387	746
LUMPKIN COUNTY	47	41	30
MACON COUNTY	0	0	0
MADISON COUNTY	4	8	7
MARION COUNTY	0	2	0
MCDUFFIE COUNTY	3	0	11
MCINTOSH COUNTY	3	15	12
MERIWETHER COUNTY	26	8	2
MILLER COUNTY	23	8	1
MITCHELL COUNTY	18	21	7

MONROE COUNTY	10	18	23
MONTGOMERY COUNTY	0	0	0
MORGAN COUNTY	14	7	9
MURRAY COUNTY	0	0	0
MUSCOGEE COUNTY	352	364	169
NEWTON COUNTY	16	12	3
OCONEE COUNTY	23	25	14
OGLETHORPE COUNTY	2	8	9
PAULDING COUNTY	105	49	44
PEACH COUNTY	90	9	14
PICKENS COUNTY	1	3	1
PIERCE COUNTY	1	1	0
PIKE COUNTY	13	8	9
POLK COUNTY	4	11	5
PULASKI COUNTY	0	8	2
PUTNAM COUNTY	18	17	9
QUITMAN COUNTY	1	4	1
RABUN COUNTY	0	4	2
RANDOLPH COUNTY	2	2	7
RICHMOND COUNTY	272	252	108
ROCKDALE COUNTY	140	149	132
SCHLEY COUNTY	4	1	4
SCREVEN COUNTY	16	9	12
SEMINOLE COUNTY	36	18	17
SPALDING COUNTY	47	31	40
STEPHENS COUNTY	39	17	4
STEWART COUNTY	40	5	18
SUMTER COUNTY	0	1	5
TALBOT COUNTY	4	0	2
TALIAFERRO COUNTY	6	1	1
TATTNALL COUNTY	18	14	13
TAYLOR COUNTY	30	5	0
TELFAIR COUNTY	2	1	3
TERRELL COUNTY	1	2	2

THOMAS COUNTY	7	9	2
TIFT COUNTY	14	42	101
TOOMBS COUNTY	13	2	11
TOWNS COUNTY	9	19	83
TREUTLEN COUNTY	4	18	7
TROUP COUNTY	685	667	112
TURNER COUNTY	11	14	9
TWIGGS COUNTY	6	6	1
UNION COUNTY	2	13	4
UPSON COUNTY	20	11	6
WALKER COUNTY	71	21	0
WALTON COUNTY	106	70	24
WARE COUNTY	14	14	1
WARREN COUNTY	4	3	3
WASHINGTON COUNTY	16	26	9
WAYNE COUNTY	15	17	2
WEBSTER COUNTY	8	12	3
WHEELER COUNTY	5	16	14
WHITE COUNTY	40	52	16
WHITFIELD COUNTY	70	86	64
WILCOX COUNTY	0	1	7
WILKES COUNTY	11	16	4
WILKINSON COUNTY	1	4	7
WORTH COUNTY	20	28	17
TOTAL PROVISIONAL	21,190	16,739	12,151

Active Registered Voters	6,428,581	5,443,046	5,047,420
Ballots Cast	3,930,890	4,165,405	2,596,947

Provisional compared to ballots cast	0.54%	0.40%	0.47%
Turnout	61.1%	76.5%	51.5%

**L.R. 7.1(D) CERTIFICATION**

I certify that this Submission has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Submission has been prepared using 14-pt Times New Roman Font.

/s/ Josh B. Belinfante

Josh Belinfante

Georgia Bar No. 047399



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the within and foregoing  
**DEFENDANT'S SUBMISSION OF THE DECLARATION OF JOHN  
ALFORD** with the Clerk of Court using the CM/ECF system, which automatically  
sent counsel of record e-mail notification of such filing.

This 9<sup>th</sup> day of November, 2018.

/s/ Josh Belinfante