

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


FAIR FIGHT ACTION, et al.,)
)
Plaintiffs,)
)
v.)
)
BRAD RAFFENSPERGER,)
in his official capacity as)
Secretary of State of the)
State of Georgia, et al.,)
)
Defendants.)

Civ. Action No. 1:18-cv-05391-SCJ

EXPERT REPORT OF MICHAEL P. MCDONALD

Associate Professor of Political Science
University of Florida
222 Anderson Hall
P.O. Box 117325
Gainesville, FL 32611

February 17, 2020


Michael P. McDonald, Ph.D.

Expert Report of Dr. Michael P. McDonald

I am Dr. Michael P. McDonald, an Associate Professor of Political Science at the University of Florida. I am widely regarded as a leading expert on United States elections. I have published extensively on elections in peer-reviewed journals and I produce what many consider to be the most reliable turnout rates of the nation and the states.¹ I have specifically published peer-reviewed articles on the reliability of voter registration files² and matching algorithms as applied to voter registration files.³ In the course of my election work, I consulted for the United States Election Assistance Commission, the Department of Defense's Federal Voting Assistance Program, the Colorado Secretary of State, the Virginia Division of Elections, the media's National Exit Poll organization, the Associated Press, ABC News, and NBC News.

I have testified or submitted expert reports in numerous election-related cases. With respect specifically to voter registration, I was an expert witness for plaintiffs challenging the Georgia Secretary of State's exact match policy.⁴ I was an expert witness for plaintiffs challenging the Kansas requirement for documentary proof of citizenship.⁵ I have been an expert witness in other litigation specifically involving voter registration in Florida⁶ and Washington.⁷ I also have an extensive publishing record and experience testifying in redistricting and other election-related cases.

In this report, in addition to my expertise in election administration, I am asked to provide analysis of a survey I directed. I have experience in the area of survey

¹ Michael P. McDonald & Samuel Popkin. 2001. "The Myth of the Vanishing Voter." *American Political Science Review* 95(4): 963-974.

² Michael P. McDonald. 2007. "The True Electorate: A Cross-Validation of Voter File and Election Poll Demographics." *Public Opinion Quarterly* 71(4): 588-602.

³ Michael P. McDonald & Justin Levitt. 2008. "Seeing Double Voting: An Extension of the Birthday Problem." *Election Law Journal* 7(2): 111-22.

⁴ *Georgia State Conf. of the NAACP, et al. v. Brian Kemp*, No. 2:16-cv-00219-WCO (N.D. Ga.).

⁵ *Fish v. Kobach*, No. 2:16-cv-02105 (D. Kan.).

⁶ *League of Women Voters of Florida v. Browning*, No. 1:08-cv-21243-CMA (S.D. Fla.).

⁷ *Washington Association of Churches v. Reed*, No. 2:06-cv-00726-RSM (W.D. Wa.).

methodology. Among my experience in the survey research area, I worked for NBC News to analyze polls during the 1996 Republican National Convention; I co-designed a survey module for a Pew Survey Research Center's 2006 pre-election poll; since 2004 I have periodically consulted for Edison Media Research, which conducts the media's national exit polls; and I designed a 2017 survey of Florida registered voters. I have published four peer-reviewed articles in *Public Opinion Quarterly*, the leading academic survey research journal, and I have published several articles and book chapters on the reliability of election surveys including in *Political Analysis*, the top political science research methods journal. The U.S. Census Bureau invited me to present my research on how to improve the Current Population Survey at the 2019 "Summer at the Census Workshop".

Please see my curriculum vitae (Attachment A) for more information about my qualifications.

In prior work in this case, I analyzed a list of 120,561 Georgia registered voters who were removed from the voter registration rolls on December 16, 2019 for the reason of "No Contact" with local election officials.

I am compensated at a rate of \$400/hour for my work on this case.

I. Summary

I have been asked by Plaintiff's counsel to investigate the reliability of a list of 313,243 registrants whom the Georgia Secretary of State's office scheduled for removal from the state's voter registration database (the "Purge List").

The Secretary of State's office has acknowledged that 22,896 of 313,243 registrants, or 7.3% of the original list, were inappropriately included on the Purge List through no fault of the registered voters.

In this report, I discuss additional evidence that the Purge List includes many thousands of registered voters who continue to reside at the addresses where they were registered to vote.

In summary, that evidence includes:

- In a survey I directed, 85.3% of the people spoken with whose registrations were cancelled by the Secretary of State because of "No Contact" verified that they have not, in fact, moved from the address that they were registered to vote at (hereafter, "voter registration address").

- National Change of Address (NCOA) matches conducted by two voter registration list vendors suggest that over 60% of the “No Contact” registrants cancelled by the Secretary of State continue to live at their voter registration address.
- Based upon the same NCOA matching evidence, only 86.4% of the registered voters set to be purged for “Inactive Reason of NCOA”—i.e., presence in the NCOA database—actually appear in the NCOA database. I do not have sufficient information to determine the reasons for this discrepancy, but it raises significant concerns that Georgia may be purging voters for reason of NCOA who have not actually submitted NCOA forms for individual or family moves. This percentage likely *overstates* the percentage of voters that could have been purged in 2019 for reason of NCOA under Georgia law because it likely includes some registrants who filed an NCOA after Georgia’s NCOA deadline.⁸

I reserve the right to update my opinions if additional information is obtained during discovery in this case.

II. Data Sources

I examine four data sources in my analysis for this report.

The first data source is an Excel file of the Purge List downloaded from the Georgia Secretary of State’s Elections Division web page entitled “2019 List Maintenance.”⁹ The Secretary of State’s office webpage describes the file as “[t]he list of registrations subject to cancellation.”¹⁰ The file is titled “2019_NGE.xlsx, and, according to its properties was created on October 30, 2019, at 7:47am by John Hallman and last modified on October 30, 2019, at 11:39am by Kevin

⁸ In order to be placed on the Purge List for the Inactive Reason of NCOA, a registrant identified as filing an NCOA form with the U.S. Post Office needs to have not responded to a mailing for 30 days. *See* O.C.G.A. § 21-2-233(c). In order to be moved from the inactive list to cancelled status, the registrant must have no contact with election officials for a period spanning at least two general elections. *See* O.C.G.A. § 21-2-235(b).

⁹ *See*: *2019 List Maintenance*, Ga. Secretary of St., https://sos.ga.gov/index.php/elections/2019_list_maintenance (Accessed December 13, 2019).

¹⁰ *Id.*

Rayburn. This file does not include any changes to the Purge List that the Georgia Secretary of State's office may have implemented following the public disclosure of the list.

The second data source is a Georgia statewide voter registration file generated by the Secretary of State's office on November 15, 2019. I hereafter refer to this file as the "Voter File."

The third data source is the result of a match of the Purge List by two data vendors, L2 and TargetSmart, that includes information on whether or not a registrant filed an NCOA and the type of NCOA: a business, family, or individual form. Also included in the supplemental data appended to the Purge List by these data vendors are registrants' phone numbers where available.

The fourth data source is a phone survey of registrants on the Purge List that I directed and that was conducted by the polling firm Latino Decisions.

III. Scope of Analysis

There are 313,243 voter records in the Purge List. Each voter record is listed as having an "Inactive Reason" of (a) "NCOA", (b) "No Contact", or (c) "Returned Mail." It is my understanding that these Inactive Reasons refer to the following:

- NCOA refers to a match of Voter File records with the United State Post Office's National Change of Address database, which records information on individuals who file a change of address form with the post office for themselves as an individual, their family, or their business.¹¹
- No Contact refers to registrants who have not had any contact with Georgia election officials after a specified date. For records in the Purge File, the date of last contact is November 6, 2012. (The Georgia Secretary of State's office later determined this date was in error and reinstated voters with contact after January 1, 2012.)
- Returned Mail refers to mail addressed to the registrant that the post office returned to election officials because the mail was undeliverable.

I match the Purge List with the November 15 Voter File using the voter registration number common to both datasets. When I do this merge, I find

¹¹ *Official USPS Change-of-Address*, USPS, <https://moversguide.usps.com/mgo/disclaimer> (Accessed February 15, 2020).

313,030 records in the Purge List with the same voter registration number in the Georgia Registered Voter File. The difference of 213 records could be due to a number of reasons, the most likely being that state election officials removed these voters from the Georgia Registered Voter File between October 31, 2019 (the last modified date of the Purge List) and November 15, 2019 (the date of the Secretary of State's office generated the Voter File).

My analysis is limited to these 313,030 registrants on the Purge List for whom I can find a matching record in the November 15, 2019, Voter File. I do not expect that the absence of the 213 registrants substantively affects my analysis or opinions.

After my preliminary analysis of the Purge List, the Georgia Secretary of State's Office acknowledged two errors affecting 22,896 registrants on the Purge List with the Inactive Reason of "No Contact."

- 293 registrants were incorrectly identified as "No Contact" due to a data conversion issue affecting Lowndes County, Georgia.¹²
- 22,603 registrants were incorrectly identified as "No Contact." The Georgia Secretary of State's office admitted they purged individuals who had failed to have contact with elections officials on or after November 7, 2012. The Secretary of State's Office has now determined that the the legally correct date for a "No Contact" purge is individuals who failed to have contact on or after January 1, 2012.

I analyze the remaining 290,134 registrants from the 313,243 on the Purge List, which excludes the 213 for whom I cannot match to the November 15 Voter File and 22,896 whom the Secretary of State's office acknowledges were erroneously placed on the Purge List.

IV. Characteristics of Registrants on the Purge List

I begin my analysis by describing the registrants on the Purge List and comparing these registrants to the November 15 Voter File.

¹² See Geoff Hing, *Georgia Nearly Purged Hundreds of Eligible Voters By Mistake*, APM Rep. (Nov. 8, 2019), <https://www.apmreports.org/story/2019/11/08/georgia-nearly-purged-hundreds-of-eligible-voters-by-mistake>.

In each of the three tables that follow, I report statistics for registrants on the Purge List whose Inactive Reason is NCOA, No Contact, Returned Mail, and the sum of these three reasons, respectively. Statistics for all persons on the November 15, 2019, Voter File are presented in the last column.

In the bottom row of the tables, I provide the total count of registrants for each of the three Inactive Reasons, and the percentage that each Inactive Reason constitutes of the total number of persons on the Purge List. Those numbers, and percentages are:

- 108,256 registrants on the Purge List for the Inactive Reason of NCOA, which represents 37.3% of all registrants on the Purge List.
- 97,577 registrants on the Purge List for the Inactive Reason of No Contact, which represents 33.6% of all registrants on the Purge List.
- 84,301 registrants on the Purge List for the Inactive Reason of Returned Mail, which represents 29.1% of all registrants on the Purge List.

The primary purpose of this section is to establish baseline demographic statistics for comparison in the analyses that follow.

A. Race

Georgia registrants are asked to provide their race on their voter registration form, with the following permissible answers recorded in the Voter File: American Indian or Alaskan Native; Asian or Pacific Islander; Black not of Hispanic Origin; Hispanic; Other; Unknown; or White not of Hispanic Origin.

In Table 1, I report the race distribution of registrants on the Purge List and the Voter File. The race distribution for the three Inactive Reasons generally follow the distribution for the Voter File. I note the three largest differences.

Overall there are 2.2 percentage points more registrants with an Unknown race among the Purge List as compared to the Voter File. This difference for voters of Unknown race likewise extends to the three Inactive Reasons: there are 3.1 percentage points more registrants for NCOA as compared to the Voter file; 2.3 percentage points more registrants for No Contact as compared to the Voter File; and 1.2 percentage points more registrants for Returned Mail as compared to the Voter File.

There are 2.0 percentage points more White Not of Hispanic Origin registrants on the Purge List as compared to the Voter File. But here the differences are mixed

when looking at the Inactive Reasons: 2.4 percentage points more registrants for NCOA as compared with the Voter File for NCOA; 1.2 percentage points fewer registrants for No Contact as compared with the Voter File; and 5.2 percentage points more registrants for Returned Mail as compared with the Voter File.

Overall, there are 2.9 percentage points fewer Black Not of Hispanic Origin registrants on the Purge List as compared with the Voter File. This difference for voters of Black Not of Hispanic Origin Race extends to the three Inactive Reasons: 3.9 percentage points fewer registrants for NCOA as compared with the Voter File for NCOA; 1.0 percentage points fewer registrants for No Contact as compared with the Voter File; and 4.0 percentage points more registrants for Returned Mail as compared with the Voter File. Consequently, among the three Purge List Inactive Reasons, Blacks Not of Hispanic Origin have a higher percentage of appearance on the Inactive Reason of No Contact (28.5%), than the for the reason of NCOA (25.6%) or Returned Mail (25.5%).

B. Age

I report in Table 2 age statistics among registrants on the Purge List and Voter File. I calculate ages from the birth year provided in the Voter File (a column called *BIRTHDATE*). I calculate four age ranges: 18-29, 30-44, 45-59, and 60+, that are common age ranges used by polling organizations.

Registrants on the Purge List are older than registrants on the Voter File. There are 9.8 percentage points fewer registrants age 18-29 on the Purge List than on the Voter File. This pattern extends to the three Inactive Reasons: there are 12.0 percentage points fewer registrants on the Purge List for the reason of NCOA as compared with the Voter File; 7.4 percentage points fewer for No Contact as compared with the Voter File; and 9.7 percentage points fewer for Returned Mail as compared with the Voter File.

This lesser number of younger registrants on the Purge List than on the Voter File is largely balanced out with more persons age 30-44 appearing on the Purge List than the Voter File. There are 10.4 percentage points more registrants age 30-44 on the Purge List than on the Voter File. This pattern extends to the three Inactive Reasons: there are 12.1 percentage points more registrants on the Purge List for the reason of NCOA as compared with the Voter File; 9.2 percentage points more registrants for No Contact as compared with the Voter File; and 9.7 percentage points more registrants for Returned Mail as compared with the Voter File.

C. Gender

Georgia registrants are asked to provide their gender on their voter registration application, which are recorded in the Voter File as Male, Female, and Unknown.

I report in Table 3 gender statistics among registrants on the Purge List and Voter File. Overall, there is little difference in the gender between the Purge List and Voter File, with the overall Purge List gender percentages differing with the Voter File by mere tenths of a percentage point.

There is some variation within the three Inactive Reasons, which are mirrored for males and females. There are 2.6 percentage points more women on the Purge List for the reason of NCOA as compared with the Voter File; 4.2 percentage points more men among No Contact as compared with the Voter File; and 1.1 percentage points more women among Returned Mail as compared with the Voter File.

Table 1. Race of Registrants on the Purge List

Race	<u>NCOA</u>		<u>No Contact</u>		<u>Returned Mail</u>		<u>Grand Total</u>		<u>Nov. 15 Voter File</u>	
	Count	%	Count	%	Count	%	Count	%	Count	%
<i>American Indian or Alaskan Native</i>	85	0.1%	63	0.1%	70	0.1%	218	0.1%	12,730	0.2%
<i>Asian or Pacific Islander</i>	1,865	1.7%	2,343	2.4%	844	1.0%	5,052	1.7%	172,406	2.3%
<i>Black not of Hispanic Origin</i>	27,742	25.6%	27,849	28.5%	21,500	25.5%	77,091	26.6%	2,188,432	29.5%
<i>Hispanic</i>	2,535	2.3%	3,024	3.1%	2,121	2.5%	7,680	2.6%	239,430	3.2%
<i>Other</i>	1,541	1.4%	1,508	1.5%	1,050	1.2%	4,099	1.4%	108,560	1.5%
<i>Unknown</i>	14,581	13.5%	12,345	12.7%	9,755	11.6%	36,681	12.6%	774,804	10.4%
<i>White not of Hispanic Origin</i>	59,907	55.3%	50,445	51.7%	48,961	58.1%	159,313	54.9%	3,927,913	52.9%
Total (% of All)	108,256	37.3%	97,577	33.6%	84,301	29.1%	290,134	100.0%	7,424,275	100.0%

Table 2. Age of Registrants on the Purge List

Age	<u>NCOA</u>		<u>No Contact</u>		<u>Returned Mail</u>		<u>Grand Total</u>		<u>Nov. 15 Voter File</u>	
	Count	%	Count	%	Count	%	Count	%	Count	%
<i>18-29</i>	10,124	9.4%	13,661	14.0%	9,890	11.7%	33,675	11.6%	1,588,460	21.4%
<i>30-44</i>	41,338	38.2%	34,435	35.3%	30,190	35.8%	105,963	36.5%	1,936,252	26.1%
<i>45-59</i>	29,474	27.2%	24,619	25.2%	22,919	27.2%	77,012	26.5%	1,911,749	25.7%
<i>60+</i>	27,320	25.2%	24,862	25.5%	21,302	25.3%	73,484	25.3%	1,987,814	26.8%
Total (% of All)	108,256	37.3%	97,577	33.6%	84,301	29.1%	290,134	100.0%	7,424,275	100.0%

Table 3. Gender of Registrants on the Purge List

Gender	<u>NCOA</u>		<u>No Contact</u>		<u>Returned Mail</u>		<u>Grand Total</u>		<u>Nov. 15 Voter File</u>	
	Count	%	Count	%	Count	%	Count	%	Count	%
<i>Female</i>	60,637	56.0%	48,156	49.4%	45,975	54.5%	154,768	53.3%	3,965,733	53.4%
<i>Male</i>	47,529	43.9%	49,390	50.6%	38,285	45.4%	135,204	46.6%	3,445,318	46.4%
<i>Unknown</i>	90	0.1%	31	0.0%	41	0.0%	162	0.1%	13,224	0.2%
Total (% of All)	108,256	37.3%	97,577	33.6%	84,301	29.1%	290,134	100.0%	7,424,275	100.0%

V. NCOA Match Analysis

At my direction, the nationally recognized polling and survey firm Latino Decisions engaged two of the most well-established national voter registration list vendors, L2 and TargetSmart, to provide phone numbers for registrants on the Purge List. In addition, these vendors also appended the results of the matches that they performed against the U.S. Post Office's NCOA database.

I provided Latino Decisions and these vendors with the Purge List minus the 293 registrants who were incorrectly identified as "No Contact" in Lowndes County, Georgia. I sent Latino Decisions the 22,603 registrants whom the Georgia Secretary of State's office restored after admitting they were improperly identified under their definition of "No Contact." Since these registrants are no longer in dispute, I exclude these individuals in the analyses that follow.

I present statistics on the combined NCOA matches from L2 and TargetSmart in Table 4. Both data vendors disclose which of the three types of NCOA matches was found: business, family, or individual.¹³ In the rows of the table, I provide statistics for each of these three types of NCOA matches, a total for any NCOA match, and the total unmatched records. I also provide statistics for each of the three Inactive Reasons of NCOA, No Contact, and Returned Mail.

The L2 and TargetSmart NCOA matches identified an NCOA match for only 86.4% of the 108,256 registrants placed on the Purge List for the reason of "NCOA." L2 and TargetSmart conducted NCOA matching to their databases after the production of the October 30, 2019, Purge List. Since O.C.G.A. § 21-2-233(c) requires a 30-day notice period for voters before they can be placed onto the inactive list, and registrants must remain on the inactive list for a period spanning two general elections before moving to cancelled status according to O.C.G.A. § 21-2-235(b), the registrants on the Purge List for reason of NCOA must have filed their NCOA forms years before Georgia's Secretary of State's office moved them to cancelled status in 2019. It is thus likely that the L2 and TargetSmart NCOA match results include registrants who should not be included according to Georgia law.

¹³ See *Change of Address – The Basics*, USPS, <https://faq.usps.com/s/article/Change-of-Address-The-Basics> (Accessed February 12, 2020).

Table 4. TargetSmart and L2 NCOA Match by Georgia Inactive Reasons

	<u>Inactive Reason</u>							
	<u>NCOA</u>		<u>No Contact</u>		<u>Returned Mail</u>		<u>Total</u>	
	Count	%	Count	%	Count	%	Count	%
<i>No Match</i>	14,732	13.6%	59,866	61.4%	26,063	30.9%	100,661	34.7%
NCOA – Business	69	0.1%	28	0.0%	28	0.1%	125	0.0%
NCOA – Family	26,619	24.6%	12,159	12.5%	18,725	24.6%	57,503	19.8%
NCOA – Individual	66,836	61.7%	25,524	26.2%	39,485	61.7%	131,845	45.4%
<i>NCOA Subtotal</i>	93,524	86.4%	37,711	38.6%	58,238	69.1%	189,473	65.3%
Total	108,256		97,577		84,301		290,134	

At this time, I do not have enough information about Georgia's Secretary of State's NCOA process to assess the reasons why 14,732 registered voters (13.6%) that these data vendors do not find an NCOA match for were nonetheless placed on the Purge List for allegedly appearing in the NCOA database. It may be that Georgia Secretary of State's office uses a list matching procedure that is too aggressive in identifying NCOA. As evidence of this over-inclusiveness, there are sixty-nine NCOA registrants whom the list vendors match as a business NCOA. It appears problematic if the Georgia Secretary of State's office uses a business change of address as evidence of a residential change of address.

Table 4 reveals that there are registrants on the Purge List for the "Inactive Reasons" of No Contact and Returned Mail for whom the data vendors find a NCOA match. Among those with "Inactive Reason" of No Contact, these data vendors find 37,711 or 38.6% of the 97,577 have an NCOA match. Among those with Inactive Reason of Returned Mail, these data vendors find 58,238 or 69.1% of the 84,301 have an NCOA match.

Among 84,301 registrants on the Purge List for the reason of Returned Mail, 26,063 or 30.9% do not have an NCOA match from these data vendors. It would not be surprising if having a piece of mail returned undeliverable is a less reliable indicator that a registrant has moved from their voter registration address than an NCOA match. Accordingly, a substantial number of the voters cancelled for this reason (Returned Mail) may not have, in fact, moved at all.

More than a majority – 59,866 or 61.4% of the 97,577 of the No Contact registrants – do not have an NCOA match from these data vendors. I focus the remainder of my report on these No Contact registrants.

VI. Survey of Purge List Registrants

With respect to the survey conducted by Latino Decisions under my direction, I oversaw the development of the sample, writing of the questionnaire (Attachment B), and the conduct of a survey of registrants on the Purge List. I am solely responsible for the analysis that follows.

The purpose of the survey is to determine whether a person still resides at the address associated with their voter registration record.

A. Valid Responses

In all, Latino Decisions successfully completed interviews with 204 respondents. Among these respondents are 25 of the 22,896 registrants that the Georgia Secretary of State's office restored to active status. Since the status of these individuals is not in dispute, I remove them from my analysis.

Of the 178 completed surveys, 142 or 79.8% are from No Contact registrants; 19 or 10.6% are from NCOA registrants; and 17 or 9.5% are from Returned Mail. Accordingly, the most valid inferences can be made from survey respondents in the No Contact category.

B. Demographic Characteristics of Valid Responses and Weighting

I present demographic characteristics of No Contact survey respondents in Tables 5, 6, and 7. These tables follow a similar format as prior Tables 1, 2, and 3 to facilitate comparisons.

Focusing on the demographic characteristics of the No Contact survey respondents, they are largely similar to those on the Purge List No Contact registrants in terms of their racial composition. As I present in Tables 1 and 5, No Contact survey respondents are 58.5% White not of Hispanic Origin compared to 51.7% of all Purge List No Contact registrants. The slightly larger percentage of Whites not of Hispanic Origin among the survey respondents is largely a consequence of some of the smaller racial group communities being unrepresented among the survey respondents, such as American Indian or Alaskan Native and Hispanics. A dynamic like this is expected since it is common for surveys to have difficulty obtaining representative samples of small population sub-groups. Survey respondents are notably older, with 51.4% of survey respondents being age 60+ compared to 25.5% of No Contact Purge List registrants. Likewise, survey respondents are more male, with 60.6% of survey respondents being male compared to 50.6% of No Contact Purge List registrants.

To improve age and gender balance of survey respondents to the target population of No Contact Purge List registrants, I weight the survey to reflect the age and gender distribution of the No Contact Purge List registrants. Weighting surveys is an industry standard practice among survey researchers. In the analysis that follows, I provide unweighted and weighted statistics to show weighting is inconsequential to my substantive conclusions or opinions.

Table 5. No Contact Survey Respondents – Race

Race	<u>No Contact</u>	
	Count	Percent
<i>American Indian or Alaskan Native</i>		0.0%
<i>Asian or Pacific Islander</i>	3	2.1%
<i>Black not of Hispanic Origin</i>	40	28.2%
<i>Hispanic</i>		0.0%
<i>Other</i>	1	0.7%
<i>Unknown</i>	15	10.6%
<i>White not of Hispanic Origin</i>	83	58.5%
Total	142	

Table 6. No Contact Survey Respondents – Age

Age	<u>No Contact</u>	
	Count	%
<i>18-29</i>	14	9.9%
<i>30-44</i>	18	12.7%
<i>45-59</i>	37	26.1%
<i>60+</i>	73	51.4%
Total	142	

Table 7. No Contact Survey Respondents – Gender

Gender	<u>No Contact</u>	
	Count	%
<i>Female</i>	56	39.4%
<i>Male</i>	86	60.6%
<i>Unknown</i>		0.0%
Total	142	

VII. Analysis of No Contact Purge List Survey Respondents

My analysis of the survey results focuses on a simple question: does a respondent live at the address associated with their voter registration record?¹⁴

Among our 142 respondents, 122 or 85.3% reported living at the address associated with their voter registration record. Weighting has little effect on their percentage, 84.8%. Of the 122 registrants reporting that the Voter File correctly reflects where these respondents are registered vote, 112 or 91.8% (88.8% weighted) reported living at the same address for the last eight years. Thus, among those registrants we contacted, the overwhelming majority live at their current address.

Statistical uncertainty is a concern when analyzing small populations, so I also calculated a margin of error. The margin of error for 142 respondents drawn from a population of 97,577 with a proportion percentage of 85% is +/- 5.9%. If the sample is representative of all No Contact registrants, I have 95% confidence that the percentage of persons on the Purge List for the reason of No Contact who have not actually moved lies somewhere between 79% and 91%.

¹⁴ The question is worded as follows, where [ADDRESS] and [CITY] are taken directly from the address and city listed in the Purge List:

The statewide voter file shows your address to be: [ADDRESS]
[CITY], Georgia. Is this the address at which you are currently
registered to vote?

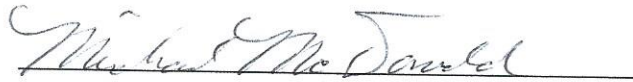
VIII. Conclusion

If the list vendors' NCOA match is accurate, it is my opinion that the Georgia Secretary of State's Office cancelled the registrations of, conservatively estimated, 59,866 No Contact registrants who continue to reside at their current voter registration address. Two additional pieces of evidence support this conclusion: those surveyed overwhelmingly verified they continue to live at their voter registration address and the surveyors were far more able to reach and survey members of this group of voters on the Purge List than they were the Returned Mail or NCOA registrants on that list.

It is further my opinion that the Georgia Secretary of State's NCOA matching procedures may identify too many registrants as having filed an NCOA form with the U.S. Post Office. Two data vendors cannot find NCOA matches for nearly 14,732 registrants whom the Georgia Secretary of State's Office cancelled based upon an alleged NCOA match.

Both numbers—59,866 and 14,732—likely underestimate the number of affected registrants given temporal differences between when Georgia conducted its list maintenance processes following Georgia law and the later date when the data vendors conducted their NCOA matching.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 17th day of February 2020, at Gainesville, Florida.

A handwritten signature in cursive script, reading "Michael P. McDonald", is written over a horizontal line.

Michael P. McDonald, Ph.D.

ATTACHMENT A

Dr. Michael P. McDonald

Associate Professor, University of Florida
Department of Political Science
222 Anderson Hall
P.O. Box 117325
Gainesville, FL 32611

Office: 352-273-2371
Fax: 352-392-8127
Email: michael.mcdonald@ufl.edu

Education

Post-Doctoral Fellow. Harvard University. August 1998 – August 1999.
Ph.D. Political Science. University of California, San Diego. February, 1999.
BS Economics. California Institute of Technology. June, 1989.

Awards

University of Florida Term Professorship. 2019.

Brown Democracy Medal, McCourtney Institute for Democracy at Penn State University. 2018.
Positive impact on democracy for the Public Mapping Project.

Tides Pizzigati Prize. 2013. Public interest software for DistrictBuilder.

Strata Innovation Award. 2012. Data Used for Social Impact for DistrictBuilder.

American Political Science Association, Information and Technology Politics Section. 2012.
Software of the Year for DistrictBuilder.

Politico. 2011. Top Ten Political Innovations for DistrictBuilder.

GovFresh. 2011. 2nd Place, Best Use of Open Source for DistrictBuilder.

Virginia Senate. 2010. Commendation for Virginia Redistricting Competition.

American Political Science Association, Information and Technology Politics Section. 2009.
Software of the Year for BARD.

Publications

Books

Michael P. McDonald. Under Contract. *The Art of Voting*. New York, NY: Oxford University Press.

Michael P. McDonald and Micah Altman. 2018. *The Public Mapping Project: How Public Participation Can Revolutionize Redistricting*. Ithaca, NY: Cornell University Press.

Michael P. McDonald and John Samples, eds. 2006. *The Marketplace of Democracy: Electoral Competition and American Politics*. Washington DC: Brookings Press.

Micah Altman, Jeff Gill, and Michael P. McDonald. 2003. *Numerical Issues in Statistical Computing for the Social Scientist*. Hoboken, NJ: Wiley and Sons.

Peer-Reviewed Articles

Brian Amos and Michael P. McDonald. Forthcoming. "A Method to Audit the Assignment of Voters to Districts." *Political Analysis*.

Matthew DeBell, Jon A. Krosnick, Katie Gera, David Yeager, and Michael McDonald. Forthcoming. "The Turnout Gap in Surveys: Explanations and Solutions." *Sociological Methods and Research*.

Tyler Culberson, Suzanne Robbins, and Michael P. McDonald. 2019. "Small Donors in Congressional Elections." *American Politics Research* 47(5): 970-99.

Micah Altman and Michael P. McDonald. 2017. "Redistricting by Formula: The Case of Ohio." *American Politics Research* 46(1): 103-31.

Micah Altman, Eric Magar, Michael P. McDonald, and Alejandro Trelles. 2017. "Measuring Partisan Bias in a Multi-Party Setting: the Case of Mexico." *Political Geography* 57(1): 1-12.

Brian Amos, Michael P. McDonald, and Russell Watkins. 2017. "When Boundaries Collide: Constructing a Database of Election and Census Data." *Public Opinion Quarterly* 81(S1): 385-400.

Trelles, Alejandro, Micah Altman, Eric Magar, and Michael P. McDonald. 2016. "Datos abiertos, transparencia y redistribución en México." *Política y Gobierno* 23(2): 331-364.

Michael P. McDonald. 2014. "Calculating Presidential Vote for Legislative Districts." *State Politics and Policy Quarterly* 14(2): 196-204.

- Micah Altman and Michael P. McDonald. 2014. "Public Participation GIS: The Case of Redistricting." *Proceedings of the 47th Annual Hawaii International Conference on System Sciences*, Computer Society Press.
- Michael P. McDonald and Caroline Tolbert. 2012. "Perceptions vs. Actual Exposure to Electoral Competition and Political Participation." *Public Opinion Quarterly* 76(3): 538-54.
- Michael P. McDonald and Matthew Thornburg. 2012. "Interview Mode Effects: The Case of Supplementing Exit Polls with Early Voter Phone Surveys." *Public Opinion Quarterly* 76(2): 326-63.
- Micah Altman and Michael P. McDonald. 2011. "BARD: Better Automated Redistricting." *Journal of Statistical Software* 42(5): 1-28.
- Michael P. McDonald. 2011. "The 2010 Election: Signs and Portents for Redistricting." *PS: Political Science and Politics* 44(2): 311-15.
- Richard Engstrom and Michael P. McDonald. 2011. "The Political Scientist as Expert Witness." *PS: Political Science and Politics* 44(2): 285-89.
- Michael P. McDonald. 2008. "Portable Voter Registration." *Political Behavior* 30(4): 491-501.
- Michael P. McDonald and Justin Levitt. 2008. "Seeing Double Voting: An Extension of the Birthday Problem." *Election Law Journal* 7(2): 111-22.
- Michael P. McDonald. 2007. "The True Electorate: A Cross-Validation of Voter File and Election Poll Demographics." *Public Opinion Quarterly* 71(4): 588-602.
- Michael P. McDonald. 2007. "Regulating Redistricting." *PS: Political Science and Politics* 40(4): 675-9.
- Micah Altman, Jeff Gill, and Michael P. McDonald. 2007. "Accuracy: Tools for Accurate and Reliable Statistical Computing." *Journal of Statistical Software* 21(1).
- David Lublin and Michael P. McDonald. 2006. "Is It Time to Draw the Line? The Impact of Redistricting on Competition in State House Elections." *Election Law Journal* 5(2): 144-57.
- Michael P. McDonald. 2006. "Drawing the Line on District Competition." *PS: Political Science and Politics* 39(1): 91-94.
- Michael P. McDonald. 2006. "Re-Drawing the Line on District Competition." *PS: Political Science and Politics* 39(1): 99-102.
- Micah Altman, Karin MacDonald, and Michael P. McDonald. 2005. "From Crayons to Computers: The Evolution of Computer Use in Redistricting." *Social Science Computing Review* 23(2): 334-46.

Michael P. McDonald. 2004. "A Comparative Analysis of U.S. State Redistricting Institutions." *State Politics and Policy Quarterly* 4(4): 371-96.

Michael P. McDonald. 2003. "On the Over-Report Bias of the National Election Study." *Political Analysis* 11(2): 180-86.

Micah Altman and Michael P. McDonald. 2003. "Replication with Attention to Numerical Accuracy." *Political Analysis* 11(3): 302-7.

Michael P. McDonald. 2002. "The Turnout Rate among Eligible Voters for U.S. States, 1980-2000." *State Politics and Policy Quarterly* 2(2): 199-212.

Michael P. McDonald and Samuel Popkin. 2001. "The Myth of the Vanishing Voter." *American Political Science Review* 95(4): 963-74. Reprinted 2006 in *Classic Ideas and Current Issues in American Government*, Bose and DiIulio, eds.

Micah Altman and Michael P. McDonald. 2001. "Choosing Reliable Statistical Software." *PS: Political Science and Politics*. 43(3): 681-7.

Bernard Grofman, William Koetzl, Michael P. McDonald, and Thomas Brunell. 2000. "A New Look at Ticket Splitting: The Comparative Midpoints Model." *Journal of Politics* 62(1): 24-50.

Samuel Kernell and Michael P. McDonald. 1999. "Congress and America's Political Development: Political Strategy and the Transformation of the Post Office from Patronage to Service." *American Journal of Political Science* 43(3): 792-811.

Law Review Articles

Michael P. McDonald. 2019-2020. "The Predominance Test: A Judicially Manageable Compactness Standard for Redistricting." *Yale Law Review, Forum* 129.

Micah Altman and Michael P. McDonald. 2013. "A Half-Century of Virginia Redistricting Battles: Shifting from Rural Malapportionment to Voting Rights and Participation." *University of Richmond Law Review* 47: 771-831.

Micah Altman and Michael P. McDonald. 2012. "Redistricting Principles for the 21st Century." *Case Western Law Review* 62(4): 1179-1204.

Michael P. McDonald and Matthew Thornburg. 2010. "Registering the Youth: Preregistration Programs." *New York University Journal of Legislation and Public Policy* 13(3): 551-72.

Micah Altman and Michael P. McDonald. 2010. "The Promise and Perils of Computers in Redistricting." *Duke J. Constitutional Law and Public Policy* 5: 69-112.

Justin Levitt and Michael P. McDonald. 2007. "Taking the 'Re' out of Redistricting: State Constitutional Provisions on Redistricting Timing." *Georgetown Law Review* 95(4): 1247-86.

Peer-Reviewed Book Chapters

Michael P. McDonald. 2014. "Contextual Income Inequality and Political Behavior." in *Political Trust and Disenchantment with Politics: Comparative Perspectives from around the Globe*, Christina Eder, Ingvill Mochmann, Markus Quandt eds. Leiden, Netherlands: Brill Publishers.

Michael P. McDonald. 2010. "Income Inequality and Participation in the United States." in *United in Diversity? Comparing Social Models in European and America*, Jens Alber and Neil Gilbert, eds. New York, NY: Oxford University Press.

Michael P. McDonald. 2008. "Redistricting and the Decline of Competitive Congressional Districts." in *Mobilizing Democracy: A Comparative Perspective on Institutional Barriers and Political Obstacles*, Margaret Levi, James Johnson, Jack Knight, and Susan Stokes, eds. New York, NY: Russell Sage Publications.

Michael P. McDonald. 2008. "Reforming Redistricting." in *Democracy in the States: Experiments in Elections Reform*, Bruce Cain, Todd Donovan, and Caroline Tolbert, eds. Washington, DC: Brookings Press.

Michael P. McDonald. 2006. "Who's Covered? Section 4 Coverage Formula and Bailout" in *The Future of the Voting Rights Act*, David Epstein, Richard H. Pildes, Rodolfo O. de la Garza, and Sharyn O'Halloran, eds. New York, NY: Russell Sage Publications.

Micah Altman, Jeff Gill, and Michael P. McDonald. 2004. "A Comparison of the Numerical Properties of EI Methods" in *Ecological Inference: New Methods and Strategies*, Gary King, Ori Rosen, and Martin Tanner, eds. New York, NY: Cambridge University Press.

Non-Peer-Reviewed Book Chapters

Michael P. McDonald. 2018. "Challenges and Opportunities in Collecting Election Administration Data" in *The Palgrave Handbook of Survey Research*, David L. Vannette and Jon A. Krosnick, eds. New York, NY: Palgrave MacMillan.

Michael P. McDonald. 2018. "History and Promise and Blending Survey Data with Government Records on Turnout" in *The Palgrave Handbook of Survey Research*, David L. Vannette and Jon A. Krosnick, eds. New York, NY: Palgrave MacMillan.

Micah Altman and Michael P. McDonald. 2015. "Redistricting and Polarization" in *American Gridlock: The Sources, Character, and Impact of Political Polarization*, James Thurber and Antonie Yoshinaka, eds. Cambridge.

Micah Altman and Michael P. McDonald. 2015. "Florida Congressional Redistricting." *Jigsaw Politics in the Sunshine State*, Seth McKee, ed. Gainesville, FL: University Press of Florida.

Michael P. McDonald. 2013. "State Legislative Districting." *Guide to State Politics and Policy*, Richard Niemi and Joshua Dyck, eds. Washington, DC: CQ Press.

- Michael P. McDonald. 2013. "Democracy in American Elections" in *Imperfect Democracies: The Democracy Deficit in Canada and the United States*, Richard Simeon and Patti Lenard, eds. Vancouver, BC: University of British Columbia Press.
- Micah Altman and Michael P. McDonald. 2012. "Technology for Public Participation in Redistricting" in *Redistricting in the West*, Gary Moncrief, ed. Lanham, MD: Lexington Press.
- Michael P. McDonald and Thomas Schaller. 2011. "Voter Mobilization in the 2008 Presidential Election" in *The Change Election: Money, Mobilization and Persuasion in the 2008 Federal Elections*, David Magleby, ed. Philadelphia, PA: Temple University Press. (previously published as a Pew Charitable Trusts monograph).
- Michael P. McDonald. 2011. "Congressional Redistricting" in *Oxford Handbook of Congress*, Frances Lee and Eric Schickler, eds. Cambridge, UK: Oxford University Press.
- Michael P. McDonald. 2011. "Voter Turnout: Eligibility Has Its Benefits" in *Controversies in Voting Behavior*, 2nd Edition, Richard G. Niemi, Herbert F. Weisberg, and David Kimball, eds. Washington, DC: CQ Press.
- Michael P. McDonald. 2010. "In Support of Non-Partisan Redistricting." in *Debating Reform: Conflicting Perspectives on How to Mend American Government and Politics*, Richard Ellis and Mike Nelson, eds. Washington, DC: Congressional Quarterly Press.
- Michael P. McDonald. 2010. "American Voter Turnout in Historical Perspective." in *Oxford Handbook of American Elections and Political Behavior*, Jan Leighley, ed. Cambridge, UK: Oxford University Press.
- Michael P. McDonald. 2009. "Mechanical Effects of Duverger's Law in the USA." in *Duverger's Law of Plurality Voting: The Logic of Party Competition in Canada, India, the United Kingdom and the United States*, Bernard Grofman, André Blais and Shaun Bowler, eds. New York, NY: Springer.
- Michael P. McDonald. 2008. "United States Redistricting: A Comparative Look at the 50 States." in *Redistricting in Comparative Perspective*, Lisa Handley and Bernard Grofman, eds. Oxford, U.K.: Oxford University Press.
- Michael P. McDonald and Matthew Thornburg. 2008. "State and Local Redistricting" in *Political Encyclopedia of U.S. States and Regions*, Donald Haider-Markel, ed. New York, NY: MTM Publishing.
- Michael P. McDonald. 2006. "Redistricting and District Competition" in *The Marketplace of Democracy*, Michael P. McDonald and John Samples, eds. Washington, DC: Brookings Press.
- Micah Altman, Karin Mac Donald, and Michael P. McDonald. 2005. "Pushbutton Gerrymanders? How Computing Has Changed Redistricting" in *Party Lines: Competition*,

Partisanship and Congressional Redistricting, Bruce Cain and Thomas Mann, eds. Washington, DC: Brookings Press.

Bruce Cain, Karin Mac Donald, and Michael P. McDonald. 2005. "From Equality to Fairness: The Path of Political Reform Since Baker v Carr" in *Party Lines: Competition, Partisanship and Congressional Redistricting*, Bruce Cain and Thomas Mann, eds. Washington, DC: Brookings Press.

Michael P. McDonald. 2005. "Validity, Data Sources" in *Encyclopedia of Social Measurement*, Vol. 3. Kimberly Kempf-Leonard, ed. San Deigo, CA: Elsevier Inc.

Michael P. McDonald. 2005. "Reporting Bias" in *Polling in America: An Encyclopedia of Public Opinion*. Benjamin Radcliff and Samuel Best, eds. Westport, CT: Greenwood Press.

Other Non-Peer Reviewed Academic Publications (Book Reviews, Invited Articles, etc.)

Michael P. McDonald and Thessalia Merivaki. 2015. "Voter Participation in Presidential Nomination Contests." *The Forum* 13(4).

Michael P. McDonald. 2011. "Redistricting Developments of the Last Decade—and What's on the Table in This One." *Election Law Journal* 10(3): 313-318.

Michael P. McDonald and Chrisopher Z. Mooney. 2011. "'Pracademics': Mixing an Academic Career with Practical Politics." *PS: Political Science and Politics* 44(2): 251-53.

Michael P. McDonald. 2011. "Voter Turnout in the 2010 Midterm Election." *The Forum* 8(4).

Michael P. McDonald. 2011. "*Redistricting: The Most Political Activity in America* by Charles S. Bullock III (book review)." *American Review of Politics* (Fall 2010/Spring 2011).

Michael P. McDonald. 2009. "'A Magnificent Catastrophe' Retold by Edward Larson (book review)." *The Election Law Journal* 8(3): 234-47.

Michael P. McDonald. 2008. "The Return of the Voter: Voter Turnout in the 2008 Presidential Election." *The Forum* 6(4).

Michael P. McDonald. 2006. "American Voter Turnout: An Institutional Perspective by David Hill (book review)." *Political Science Quarterly* 121(3): 516-7.

Michael P. McDonald. 2006. "Rocking the House: Competition and Turnout in the 2006 Midterm Election." *The Forum* 4(3).

Micah Altman and Michael P. McDonald. 2006. "How to Set a Random Clock (Remarks on Earnest 2006)." *PS: Political Science and Politics* 39(4): 795.

Michael P. McDonald. 2004. "Up, Up, and Away! Turnout in the 2004 Presidential Election." *The Forum* 2(4).

Michael P. McDonald. 2004. "Drawing the Line on the 2004 Congressional Elections." *Legislative Studies Section Newsletter* (Fall): 14-18.

Michael P. McDonald. 2004. "2001: A Redistricting Odyssey." *State Politics and Policy Quarterly* 4(4): 369-370.

Micah Altman and Michael P. McDonald. 1999. "Resources for Testing and Enhancement of Statistical Software" in *The Political Methodologist* 9(1).

Michael P. McDonald. 1999. "Representational Theories of the Polarization of the House of Representatives" in *Legislative Studies Section Newsletter, Extension of Remarks* 22(2): 8-10.

Michael P. McDonald. 2003. "California Recall Voting: Nuggets of California Gold for Political Behavior." *The Forum* 1(4).

Reports

Michael P. McDonald. 2009. "Voter Preregistration Programs." Fairfax, VA: George Mason University.

Michael P. McDonald. 2009. *Midwest Mapping Project*. Fairfax, VA: George Mason University.

Michael P. McDonald and Matthew Thornburg. 2008. "The 2008 Virginia Election Administration Survey." Fairfax, VA: George Mason University.

Kimball Brace and Michael P. McDonald. 2005. "Report to the Election Assistance Commission on the Election Day Survey." Sept. 27, 2005.

Opinion Editorials

Michael P. McDonald. 2019. "Let 16-year-olds vote for L.A. school board." *Los Angeles Times*. May 8, 2019.

Michael P. McDonald. 2018. "I agree with Donald Trump, we should have voter ID. Here's how and why." *USA Today*. Jan. 15, 2018.

Michael P. McDonald. 2017. "The Russians are hacking. Luckily the Trump voter fraud commission isn't in charge." *USA Today*. Sept. 23, 2017.

Michael P. McDonald. 2016. "Better Hope the Election is Not Close." *USA Today*. Nov. 2, 2016.

Michael P. McDonald. 2016. "Blame Government for Voting Crisis." *USA Today*. March 24, 2016.

Michael P. McDonald, Peter Licari and Lia Merivaki. 2015. "The Big Cost of Using Big Data in Elections." *The Washington Post*. Oct. 18, 2015.

- Michael P. McDonald 2013. "Truths and Uncertainties that Surround the 2014 Midterms." *The Hill*. November 5, 2013.
- Michael P. McDonald. 2011. "The Shape of Things to Come: New Software May Help the Public Have a Crucial Redrawing of Voting Districts." *Sojourners*. April 2011: 11-12.
- Micah Altman and Michael P. McDonald. 2011. "Computers: Redistricting Super Hero or Evil Mastermind?" *Campaigns and Elections Magazine*. January 2011.
- Michael P. McDonald. 2010. "Who Voted in 2010, and Why It Matters for 2012." *AOL News*. Nov. 4, 2010.
- Michael P. McDonald and Seth McKee. "The Revenge of the Moderates." *The Politico*. Oct. 10, 2010.
- Michael P. McDonald and Micah Altman. 2010. "Pulling Back the Curtain on Redistricting." *The Washington Post*. July 9, 2010.
- Michael P. McDonald. 2008. "This May Be the Election of the Century." *The Politico*. Sept. 9, 2008.
- Michael P. McDonald. 2008. "Super Tuesday Turned into a Super Flop." *Roll Call*. Feb. 11, 2008.
- Michael P. McDonald. 2006. "5 Myths About Turning Out the Vote." *The Washington Post*. Oct. 29, 2006, p. B3.
- Michael P. McDonald. 2006. "Supreme Court Lets the Politicians Run Wild." *Roll Call*. June 29, 2006.
- Michael P. McDonald. 2006. "Re-Redistricting Redux." *The American Prospect*. March 6, 2006.
- Michael P. McDonald and Kimball Brace. "EAC Survey Sheds Light on Election Administration." *Roll Call*. Oct. 27, 2005.
- Michael P. McDonald. 2004. "The Numbers Prove that 2004 May Signal More Voter Interest." *Milwaukee Journal Sentinel*. Milwaukee, WI.
- Michael P. McDonald. 2004. "Democracy in America?" *La Vanguardia*. Barcelona, Spain.
- Michael P. McDonald. 2003. "Enhancing Democracy in Virginia." *Connection Newspapers*. March 24.
- Michael P. McDonald. 2001. "Piecing Together the Illinois Redistricting Puzzle." *Illinois Issues*. March, 2001.

Samuel Popkin and Michael P. McDonald. 2000. "Turnout's Not as Bad as You Think." *The Washington Post*. Nov. 5: B-1.

Samuel Popkin and Michael P. McDonald. 1998. "Who Votes? A Comparison of NES, CPS, and VNS Polls." *Democratic Leadership Council Bluebook*. Sept., 1998.

Software Packages

Micah Altman, Michael P. McDonald, and Azavea. 2012. "DistrictBuilder." Open source software to enable public participation in redistricting. Source code available at Github. Project website, <http://www.districtbuilder.org>.

Micah Altman and Michael P. McDonald. 2007. "BARD: Better Automated Redistricting." R package available through CRAN. Source code available at Sourceforge.

Micah Altman, Jeff Gill, and Michael P. McDonald. 2004. "Accuracy: Tools for testing and improving accuracy of statistical results." R package available through CRAN.

Grants and Contracts

Election Data Administrative Data Research Facility. (\$843,000) Alfred P. Sloan Foundation grant to collect precinct election results and boundary data and to upgrade DistrictBuilder software.

Virginia Election Data. (\$6,500) Produced election data for *The Washington Post's* 2019 Virginia state elections coverage.

Audit of Assignment of Virginia Registered Voters to Districts. (\$154,000). Work for the Virginia Department of Elections to audit the assignment of registered voters to districts.

National Voter File. (\$125,000) Alfred P. Sloan Foundation grant to pilot the collection of a national voter file for academic and non-partisan purposes.

Pilot Study for Election Data Administrative Data Research Facility. (\$125,000) Alfred P. Sloan Foundation grant to collect precinct election results and boundary data and to upgrade DistrictBuilder software.

Improving Integrity of Voter File Addresses. (\$20,000) Colorado Secretary of State support to develop methods to improve voter file addresses.

Fabricating Precinct Boundaries. (\$17,000). MIT Election Science and Data Lab support to explore fabricating precinct boundaries from geocoded voter files.

UF Informatics Post-Doc Top-Off Award. 2017. (\$16,000). Funding from the UF Informatics Institute to provide additional post-doc funding in support of Hewlett Foundation grant.

U.S. Election Project. 2016. (\$50,000). Hewlett Foundation support for U.S. Election Project Activities.

UF Informatics Institute Seed Fund Award. 2016. (\$48,000). Project funded by the UF Informatics Institute to explore the reliability of Florida's voter registration file.

Election Forum. 2016. (\$20,000). Project funded by the Pew Charitable Trusts for an election forum held at the University of Florida.

Survey of Voter File Accessibility. 2016. (\$1,650). Contract from the Institute for Money in State Politics to survey costs and accessibility of states' voter files.

Florida Election Reform. 2015. (\$13,000). Project funded by Democracy Fund for an election reform forum held in Tallahassee, FL. Pew Charitable Trusts independently provided travel support for some speakers.

New York Redistricting. 2011. (\$379,000). Project funded by the Sloan Foundation to provide for public redistricting in New York and continued software development.

Citizen Redistricting Education, Software Supplemental. 2011. (\$50,000). Project funded by Joyce Foundation to provide continued redistricting software development for use by advocacy groups in six Midwestern states.

National Redistricting Reform Coordination. 2009-10. (\$100,000). With Thomas Mann and Norman Ornstein. Project funded by Joyce Foundation to support coordination of national redistricting reform efforts by the Brookings Institution and the American Enterprise Institute.

Citizen Mapping Project. 2009-10. (\$124,000 & \$98,000). With Micah Altman, Thomas Mann, and Norman Ornstein. Project funded by the Alfred P. Sloan Foundation. An award to George Mason University enables development of software that, essentially, permits on-line redistricting through commonly used internet mapping programs. A second award to the Brookings Institution and American Enterprise Institute provides organizational support, including the convening of an advisory board.

Citizen Redistricting Education. 2010. (\$104,000). Project funded by the Joyce Foundation. Provides for redistricting education forums in five Midwestern state capitals in 2010 and other continuing education efforts.

Pre-Registration Programs. 2008-9. (\$86,000). Project funded by the Pew Charitable Trusts' Make Voting Work Initiative to examine pre-registration programs (voter registration for persons under age 18) in Florida and Hawaii.

Sound Redistricting Reform. 2006-9. (\$405,000). Project funded by the Joyce Foundation, conducted jointly with the Brennan Center for Justice at NYU to investigate impacts of redistricting reform in Midwestern states.

Electoral Competition Project. 2005-6. (\$200,000) Project funded by The Armstrong Foundation, the Carnegie Corporation of New York, the JEHT Foundation, The Joyce Foundation, The Kerr Foundation, Inc., and anonymous donors. Jointly conducted by the Brookings Institution and Cato Institute to investigate the state of electoral competition in the United States.

George Mason University Provost Summer Research Grant. 2004. (\$5,000).

ICPSR Data Document Initiative. 1999. Awarded beta test grant. Member, advisory committee on creation of electronic codebook standards.

Academic Experience

Courses Taught: Election Data Science (graduate and undergraduate), Election Law, Public Opinion and Voting Behavior, Parties and Campaigns (graduate and undergraduate), Comparative Electoral Institutions, Introduction to American Politics, American Politics Graduate Field Seminar, Congress, Legislative Politics, Research Methods (undergraduate), Advanced Research Methods (graduate), Freshman Seminar: Topics in Race and Gender Policies, and Legislative Staff Internship Program.

University of Florida

- Associate Professor. August 2014- Present.

George Mason University

- Associate Professor. May 2007 – May, 2014.
- Assistant Professor. Aug 2002 – May, 2007.

The Brookings Institution

- Non-Resident Senior Fellow. January 2006 – June 2016.
- Visiting Fellow. June 2004 – December 2006.

University of Illinois, Springfield. Assistant Professor. Aug 2000 – June 2002.
Joint appointment in Political Studies Department and Legislative Studies Center.

Vanderbilt University. Assistant Professor. Aug 1999 – Aug 2000.

Harvard-MIT Data Center. Post-Doctoral Research Fellow. Sept. 1998 – Aug 1999.
Developed Virtual Data Center, a web-based data sharing system for academics. Maintained Record of American Democracy (U.S. precinct-level election data).

University of California-San Diego

- Assistant to the Director for University of California, Washington DC program. Sept 1997 – June 1998.
- Instructor for research methods seminar for UCSD Washington interns.
- Visiting Assistant Professor. Spring Quarter 1997.
- Visiting Assistant Professor. Summer Session, Aug 1996 and Aug 1997.
- Teaching Assistant/Grader. Aug 1991 – March 1997.

Professional Service

National Academy of Sciences, Member, Program Committee for “Workshop on 2020 Census Data Products: Data Needs and Privacy Considerations.”

Non-Profit Voter Engagement Network, Member, Advisory Board. 2007 – present.

National States Geographic Information Council - Geo-Enabled Elections, Member, Circle of Advisors. 2018 – present.

Election Sciences Conference-in-a-conference at the 207 Southern Political Science Association Conference. Organizer. 2016.

Overseas Vote Foundation, Member, Advisory Board. 2005 – 2013.

National Capital Area Political Science Association, Member, Council, 2010 – 2012.

State Politics and Policy Quarterly, Editorial Board Member 2004-2011.

Virginia Public Access Project, Member, Board of Directors. 2004 – 2006.

Fairfax County School Board Adult and Community Education Advisory Committee, Member. 2004 – 2005.

State Politics and Policy Quarterly, Guest Editor. Dec 2004 issue.

Related Professional Experience

Media Consultant

- Edison Media Research/Mitofsky International. Nov. 2018; Nov. 2004; Nov. 2006; Feb. 2008; Nov. 2008. Worked national exit polling organization's “Decision Desk.”
- Associated Press. Nov. 2016 and Nov. 2010. Worked “Decision Desk.”
- ABC News. Nov. 2002. Worked “Decision Desk.”
- NBC News. Aug 1996. Analyzed polls during the Republican National Convention.

Redistricting/Elections Consultant.

- Expert Witness. 2019. *Fair Fight Action, Inc. et al. v Brad Raffensperger* No. 1:18-CV-5391-SCJ (N.D. Ga.)
- Consultant. 2019. Virginia Division of Elections. Audited the assignment of registered voters to districts.
- Expert Witness. 2018. *Georgia Coalition for the Peoples’ Agenda, Inc. et. al v. Kemp*. No. 1:18-cv-04727-ELR (N.D. Ga.)
- Expert Witness. 2018. *Martin v. Kemp*. Civil Action No. 1:18-cv-04776-LMM.

- Expert Witness. 2018. *Georgia Coalition for the Peoples' Agenda, Inc. v. Kemp*. Civil Action No. 1:18-cv-04727-ELR.
- Expert Witness. 2018. *Common Cause Indiana v. Lawson*. Case No. 1:17-cv-3936-TWP-MPB (Indiana).
- Expert Witness. 2017-18. *Benisek v. Lamone*. Case No. 13-cv-3233 (Maryland).
- Expert Witness. 2016-2017. *Vesilind v. Virginia State Board of Elections*. Case No. CL15003886 (Virginia).
- Expert Witness. 2016-2017. *Fish v. Kobach*. Case No. 2:16-cv-02105 (Kansas).
- Expert Witness. 2016. *Arizona Libertarian Party v. Reagan*. Case No.: 2:16-cv-01019-DGC (Arizona).
- Expert Witness. 2016. *Georgia State Conf. of the NAACP, et al. v. Brian Kemp*. Case No. 2:16-cv-00219-WCO (Georgia).
- Consultant. Federal Voting Assistance Program. 2014-2015. Analyzed voting experience of military and overseas voters.
- Expert Witness. 2013-2014. *Page v. Virginia State Board of Elections*. No. 3:13-cv-678 (E.D.VA).
- Expert Witness. 2013-2014. *Delgado v. Galvin*. (D. MA).
- Beaumont Independent School District. 2013. Prepared response to DOJ data request.
- Federal Voting Assistance Program. 2012-13. Analyzed voting experience of military and overseas voters.
- Gerson Lehrman Group. 2012. Provided election analysis to corporate clients.
- Expert Witness. 2011-2012. *Backus v. South Carolina*. No. 3:11-cv-03120 (D.S.C.).
- Expert Witness. 2012. *Wilson v. Kasich*. No. 2012-0019 (Ohio Sup. Ct.).
- Consulting Expert. 2011-2012. Bondurant, Mixson, and Elmore, LLP. (Review of Georgia's state legislative and congressional redistricting Section 5 submission).
- Consultant. 2012. New Jersey Congressional Redistricting Commission.
- Expert Witness. 2011. *Perez v. Texas*. No. 5:11-cv-00360 (W.D. Tex.).
- Expert Witness. 2011. *Wilson v. Fallin*. No. O-109652 (Okla. Sup. Ct.).
- Consultant. 2011. United States Federal Voting Assistance Program.
- Consultant. 2011. Virginia Governor's Independent Bipartisan Advisory Redistricting Commission.
- Consultant. 2011. New Jersey State Legislative Redistricting Commission.
- Expert Witness. 2010. *Healey v. State, et al.* C.A. No. 10-316--S (USDC-RI).
- Research Triangle Institute. 2008-2009. Consultant for Election Assistance Commission, 2008 Election Day Survey.
- U.S. State Department. 2008. Briefed visiting foreign nationals on U.S. elections.
- Expert Witness. 2008. *League of Women Voters of Florida v. Browning* (08-21243-CV-ALTONAGA/BROWN)
- Pew Center for the States. 2007. Consultant for Trends to Watch project.
- Expert Witness. 2007. *Washington Association of Churches v. Reed* (CV06-0726).
- Electoral Assistance Commission. 2005. Analyzed election administration surveys.
- Arizona Independent Redistricting Commission. 2001-2003. Consultant.

- Expert Witness. 2003. *Minority Coalition for Fair Redistricting, et al. v. Arizona Independent Redistricting Commission* CV2002-004380 (2003).
- Expert Witness. 2003. *Rodriguez v. Pataki* 308 F. Supp. 2d 346 (S.D.N.Y. 2004).
- Consulting Expert. 2002. *O'Lear v. Miller* No. 222 F. Supp. 2d 850 (E.D. Mich.).
- Expert Witness. 2001-2002. *In Re 2001 Redistricting Cases* (Case No. S-10504).
- Expert Witness. 2001. *United States v. Upper San Gabriel Valley Municipal Water District* (C.D. Cal. 2000).
- California State Assembly. 1991. Consultant.
- Pactech Data and Research. Research Associate. Aug 1989 - June 1991.

Campaign/Political Consultant.

- Ron Christian for Virginia State Senate. June – November, 2003.
- Theresa Martinez for Virginia House of Delegates. May, 2003.
- Senior Consultant. California State Assembly. Nov. – Dec 1998.
- California Assembly Democrats. June – November 1998.
- Susan Davis & Howard Wayne for CA State Assembly '96. 1996.
- Intern. June – Sept 1995. UC-San Diego, Science and Technology Policy and Projects.

Polling Consultant.

- Hickman-Brown. July, 2000. Analyzed national and state level exit and CPS polls for use in various campaigns. Analyzed surveys for congressional, state, and local political campaigns.
- Decision Research. Aug 1994 – Dec 1994. Conducted and analyzes surveys for congressional and statewide campaigns.
- Speaker Jose de Venecia of the Philippines. Feb, 1997.
- Joong-Ang Ilbo/RAND. Oct, 1996. Analyzed survey of Korean attitudes on national security issues.
- UCSD. Nov. 1991. Conducted and analyzed survey of student attitudes.

ATTACHMENT B

INTRO. Hello, may I please speak with Mr./Ms. [INPUT THE NAME OF RESPONDENT]?

Note: Verify if that person lives there, schedule call back

Hello, my name is _____. This is not a sales call. I am calling on behalf of American Decisions, an independent survey research firm. We are conducting a very short survey about issues important in your community and we'd like to include your opinions in our research.

Disposition codes:

Spoke with name on list, completed survey	1
Spoke with name on list, declined survey	2
Name on list is at HH, scheduled call back	3
Name on list does not live there	4
No answer	5

PRE1. [CONFADDR] Okay, not a problem I can call back at a more convenient time. But just to make sure our records are correct, can you confirm that [NAME ON LIST] current address is: [ADDRESS] [CITY]?

Note: Ask if person who answers phone says "he/she is not here or available right now." So this is asked in instances where we believe we have the correct household, but the respondent is just not available.

Yes, address correct	1
No, address not correct	2

Q1. [RESIDENT] Are you currently over the age of 18 and a resident of Georgia?

Yes.....CONTINUE	1
No.....TERMINATE	2

Q2. [RACE] Just to make sure we have a representative sample of all people here in Georgia, can you indicate your primary race or ethnicity?

White, not of Hispanic origin	1
Black, not of Hispanic origin	2
Hispanic or Latino	3

Asian or Pacific Islander	4
American Indian or Alaska Native	5
Other	6
Unknown	7
Refused	99

Q3. [EVERREG] Have you ever been registered to vote in the state of Georgia?

Yes	1
No	2
Don't know	3
Refused	99

Q4. [WHENREG] Do you recall what year you registered to vote in Georgia?

No	0
Yes → Specify Year	— — — —
Refused	9999

Q5. [WHENREG2] IF WHENREG=0 OR 9999

Well, can you remember if you registered...

In the last year	1
In the last 3 years	2
In the last 5 years	3
In the last 10 years	4
More than 10 years ago	5
Don't know	6
Refused	99

Q6. [REGADDR] The statewide voter file shows your address to be: [ADDRESS] [CITY], Georgia. Is this the address at which you are currently registered to vote?

Yes.....SKIP TO REGLONG	1
No	2
Don't know	3
Refused	99

Q7. [NEWADDR] IF REGADDR=2. What is the new address where you are registered to vote?

Q8. [REGLONG] How many years have you been registered to vote at this address?

____ NUMBER OF YEARS (0-100)
 (INT: ENTER 0 IF LESS THAN 1 YEAR)
 -8 DON'T KNOW
 -9 REFUSED

Q9. [REGLONG2] IF REGLONG= -8 or -9

Do you think it might have been...?

Less than a year	1
1 to 3 years	2
3 to 5 years	3
5 to 10 years	4
More than 10 years	5
Don't know	6
Refused	99

Q10. [MOVED8] Have you moved to a new house or apartment in the last 8 years?

Yes.....SKIP TO REGLONG	1
No	2
Don't know	3
Refused	99

Q11. [NCOA] IF MOVED5=2,3,99 add "Even if you have not recently moved," Thinking about the last time you moved, did you fill out a change of address form with the U.S. Postal Service?

Yes	1
No	2
Don't know	3
Refused	99

Q12. [OTHERMOVE] Besides yourself, have you had another adult family member or person living with you that has moved out in the last 8 years?

Yes	1
No	2
Don't know	3
Refused	99

Q13. [WHEREMOVE] IF MOVED8=1. When you moved most recently, was that move within your same neighborhood, was it across town, or did you move to a new town or city?

Within the same neighborhood	1
Across town	2
Moved to a new town or city	3
Refused	99

Q14. [WHEREMOVE] IF MOVED8=1. When you have moved, did you ever move away from Georgia to another state, even temporarily, for school, military assignment, work or some other reason, and then you moved back to Georgia?

Yes, moved away from Georgia, then back	1
No, did not move away from Georgia	2
Refused	99

Q15. [WHYMOVE] IF WHEREMOVE=1. What was the reason you moved away from Georgia?

School / College	1
Military	2
Work / Business	3
Vacation	4
Something else	5

Q16. [REGNAME]. Some people register to vote under their full name and others use different versions of their name. Others might have changed their name since they registered.

The statewide voter file shows your name to be [FILL NAME]. Is this the name under which you are registered to vote?

Yes	1
No	2
Don't know	3

Refused

99

Q17. [NEWNAME] IF REGNAME=2. What is the correct name you are registered to vote under?

(INT: ASK RESPONDENT TO SPELL OUT NAME, LETTER BY LETTER. CONFIRM NAME BY SPELLING BACK TO RESPONDENT.)

-8 DON'T KNOW

-9 REFUSED

Q18. [BIRTHYEAR] Just a few final demographic questions that are important to complete our research. In what year were you born?

__ __ __ __ (refused 9999)

Q19. [GENDER] Do you consider your gender to be

Female	1
Male	2
Neither of these / other	3
Refused	99

Q20. [EDUCATION] What is the highest level of education you completed?

Grades 1 - 8	1
Some high school	2
Graduate high school	3
Some college	4
Associates degree (2-year)	5
College degree (bachelors)	6
Post graduate / professional degree	7

Q21. [LASTVOTE] When was the last election you remember voting in here in Georgia?

TEXT: RECORD VERBATIM _____

CERTIFICATE OF SERVICE

I hereby certify that, on February 18, 2020, I caused to be served the foregoing **REPORT OF PLAINTIFFS' EXPERT WITNESS MICHAEL MCDONALD** by filing it through the Court's ECF system, which will serve the following counsel:

Chris Carr, Esq.
Attorney General
Dennis Dunn, Esq.
Deputy Attorney General
Russell Willard, Esq.
Senior Assistant Attorney General
Georgia Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334
ccarr@law.ga.gov
ddunn@law.ga.gov
rwillard@law.ga.gov

Joshua Barrett Belinfante, Esq.
Vincent Robert Russo, Jr., Esq.
Brian Edward Lake, Esq.
Carey Allen Miller, Esq.
Alexander Denton, Esq.
Special Assistant Attorneys General
Robbins Ross Alloy Belinfante Littlefield, LLC
500 Fourteenth St., N.W.
Atlanta, GA 30318
Telephone: (678) 701-9381
Fax: (404) 856-3250
jbelinfante@robbinsfirm.com
blake@robbinsfirm.com
vrusso@robbinsfirm.com
cmiller@robbinsfirm.com
adenton@robbinsfirm.com

Bryan P. Tyson, Esq.
Bryan F. Jacoutot, Esq.
Diana LaRoss, Esq.
Special Assistant Attorneys General
Taylor English Duma LLP
1600 Parkwood Circle
Suite 200
Atlanta, GA 30339
Telephone: (678) 336-7249
btyson@taylorenghish.com
bjacoutout@taylorenghish.com
dlaross@taylorenghish.com

/s/ Leslie J. Bryan

Leslie J. Bryan

Georgia Bar No. 091175