



November 28, 2023

Senate Reapportionment & Redistricting Committee
421-D CAP
Atlanta, GA 30334

House Reapportionment & Redistricting Committee
508-A Coverdell Legislative Office Building
Atlanta, GA 30334

Via Publication

Re: Remedial State Legislative Map Proposals

Chair Echols, Chair Leverett, and Committee Members:

The individual and organizational plaintiffs in *Alpha Phi Alpha Fraternity Inc. et al. v. Raffensperger* submit the attached proposed State House and State Senate plans for your consideration.¹

I. Background

On October 26, 2023, a federal court in the Northern District of Georgia ruled in favor of the *Alpha Phi Alpha* Plaintiffs and held that Georgia's 2021 State House and State Senate redistricting plans (HB 1EX and SB 1EX respectively) violate Section 2 of the Voting Rights Act ("VRA"). The Court's 516-page order followed an eight-day trial, during which the Court heard from mapping experts, social scientists, and fact witnesses. In its decision, "the Court determine[d] that in certain areas of the State, the political process is not equally open to Black voters."²

To comply with the VRA, the Court ordered new State Senate and State House plans to be drawn that include "two additional majority-Black Senate districts in south-metro Atlanta; two additional majority-Black House districts in south-metro

¹ Plaintiffs' proposed State House maps are attached as Exhibit A, and plaintiffs' proposed State Senate maps are attached as Exhibit B. The Block Equivalency Files associated with the proposed maps can be found here: <https://www.acluga.org/en/technical-files-associated-proposed-maps-block-equivalency-files-0>.

² *Alpha Phi Alpha Fraternity Inc. v. Raffensperger*, No. 1:21-CV-05337-SCJ, 2023 WL 7037537, at *2 (N.D. Ga. Oct. 26, 2023).

Atlanta, one additional majority-Black House district in west-metro Atlanta, and two additional majority-Black districts in and around Macon-Bibb.”³ The Court defined a particular area in which those new Black-majority districts were required to be drawn in order to remedy vote dilution and increase opportunities for Black voters. For example, in the State Senate, the area is comprised of ten Senate districts in the southern part of the Atlanta Metro area.⁴ The Court referred the State to the illustrative plans submitted at trial by the *Alpha Phi Alpha* Plaintiffs and other co-plaintiffs as “illustrative remedial plan[s] to consult.”⁵

II. The Committee Senate Plan Does Not Comply with the Court’s Order

The proposed State Senate map released by the Senate Reapportionment & Redistricting Committee on November 27, 2023 (“the Committee Plan”) fails to comply with the Court’s order. Despite the Court’s order that Black voters in the identified ten-district area be afforded additional opportunities to elect candidates of choice in two new Black-majority districts, the Committee Plan provides very few Black voters with *new* opportunities to elect candidates of choice. The vast majority of the Black voters who are newly placed into Black-majority districts under the Committee Plan are drawn from districts *outside* of the ten-district vote dilution area identified by the Court. By moving around voters in districts outside the Court’s area of focus, the Committee Plan increases the total number of Black-majority districts without meaningfully changing the configuration of the districts that the Court found violated the VRA.

For example, “new” Black-majority Senate District 17 under the Committee Plan, in Henry and Clayton Counties, is comprised almost entirely of enacted Black-majority districts 10 and 44, such that almost every Black voter in this “new” district was already in a Black-majority district under the enacted plan. To accommodate this “new” Black-majority district, the Committee Plan moves Black voters from enacted Senate District 42, a non-Black-majority district located outside of the Court’s vote-dilution area of focus, into already-majority-Black districts (including Senate Districts 10 and 44, which the Committee Plan moves north into DeKalb County). Meanwhile, enacted Senate District 17, which the Court specifically found to be unlawful, is renamed Senate District 42 under the Committee Plan, but its configuration barely changes.⁶ A few Black-majority precincts in Henry County are moved into the “new” Black-majority Senate District 17, but other Black-majority

³ *Id.* at *143.

⁴ *Id.* at *144.

⁵ *Id.* at *145.

⁶ *Id.* at *144.

precincts in Newton County, around Covington, are moved out of a Black-majority district. In sum: the Committee Plan operates a shell game, in which Black voters in the vote dilution area identified by the Court gain no new opportunities, and districts that the Court specifically struck down remain intact.⁷

A prime illustration of how the Committee Plan fails to rectify vote dilution as ordered by the Court is seen through *Alpha Phi Alpha* Plaintiff Eric Woods, who lives in Tyrone, Georgia. Under the Committee Plan, Mr. Woods would continue to reside in a non-Black-majority district, Senate District 16. Indeed, the Committee Plan leaves Senate District 16 entirely unchanged. Despite Mr. Woods proving his case and prevailing in court, the Committee Plan provides Mr. Woods and others similarly situated with no relief at all.

III. The Plaintiffs’ Proposed Plans Fully and Faithfully Implement the Court’s Order

The *Alpha Phi Alpha* Plaintiffs’ proposed remedial plans, on the other hand, fully and faithfully implement the Court’s order. And at least as to the Senate Plan, it does so while changing the same number of total districts as the Committee Plan. In other words, Plaintiffs’ proposed remedial plan is no more disruptive in its effects or burdensome in its implementation than the Committee Plan, and unlike the Committee Plan, it complies with the VRA and the order of the Court. And importantly, while under the Committee Plan most (80%) of the Black voters who are newly placed in a Black-majority district come from outside the vote-dilution area identified by the Court, in the remedial plans, 100% of the Black voters who are newly drawn into Black-majority districts are within that area.

Plaintiffs’ proposed plans would ensure new opportunities to elect candidates of choice for a far greater number of Black voters in the areas identified by the Court. They would actually remedy the vote dilution that the Court found in the 2021 Enacted Plan and they would make few changes to districts unaffected by the Court’s order. Given that these maps will be the third iteration of the State Senate and State House plans in as many years, it is important that the General Assembly make the changes that are necessary to comply with the Court’s order—and only those changes. Timely adopting a map that fully complies with the Court’s order, while making the

⁷ The Committee Plan’s treatment of Senate District 6, which is in Cobb County, outside the ten-district vote dilution area identified by the Court, is similar. Despite being outside the area of focus and not challenged by the Plaintiffs, enacted Senate District 6 is eliminated to make room for a “new” Black-majority Senate District 28 that is drawn mainly from districts that were already majority-Black. To accommodate these changes and avoid changes that would create new opportunities for Black voters in the area of focus identified by the Court, the Committee Plan also radically reduces the compactness of neighboring districts like Senate District 38, which is now the least compact district on the map under the Committee Plan according to multiple metrics.

least number of extraneous changes, will conserve public resources and alleviate the burden that hard-working election administrators in Georgia will face in implementing new maps. By contrast, the Committee Plan is a recipe for needless confusion and extended litigation.

As the Court said in its order, “Georgia has made great strides since 1965 towards equality in voting.”⁸ But it also acknowledged that there is more work to be done.⁹ The Committee Plan does not advance the work of building an equal political process in Georgia, and it does not comply with the Court’s directive. This body can do better.

The *Alpha Phi Alpha* Plaintiffs respectfully urge the General Assembly to adopt the attached plans. If you have any questions, please do not hesitate to reach out to the undersigned attorneys.

Sincerely,

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⁸ *Id.* at *145.

⁹ *Id.*

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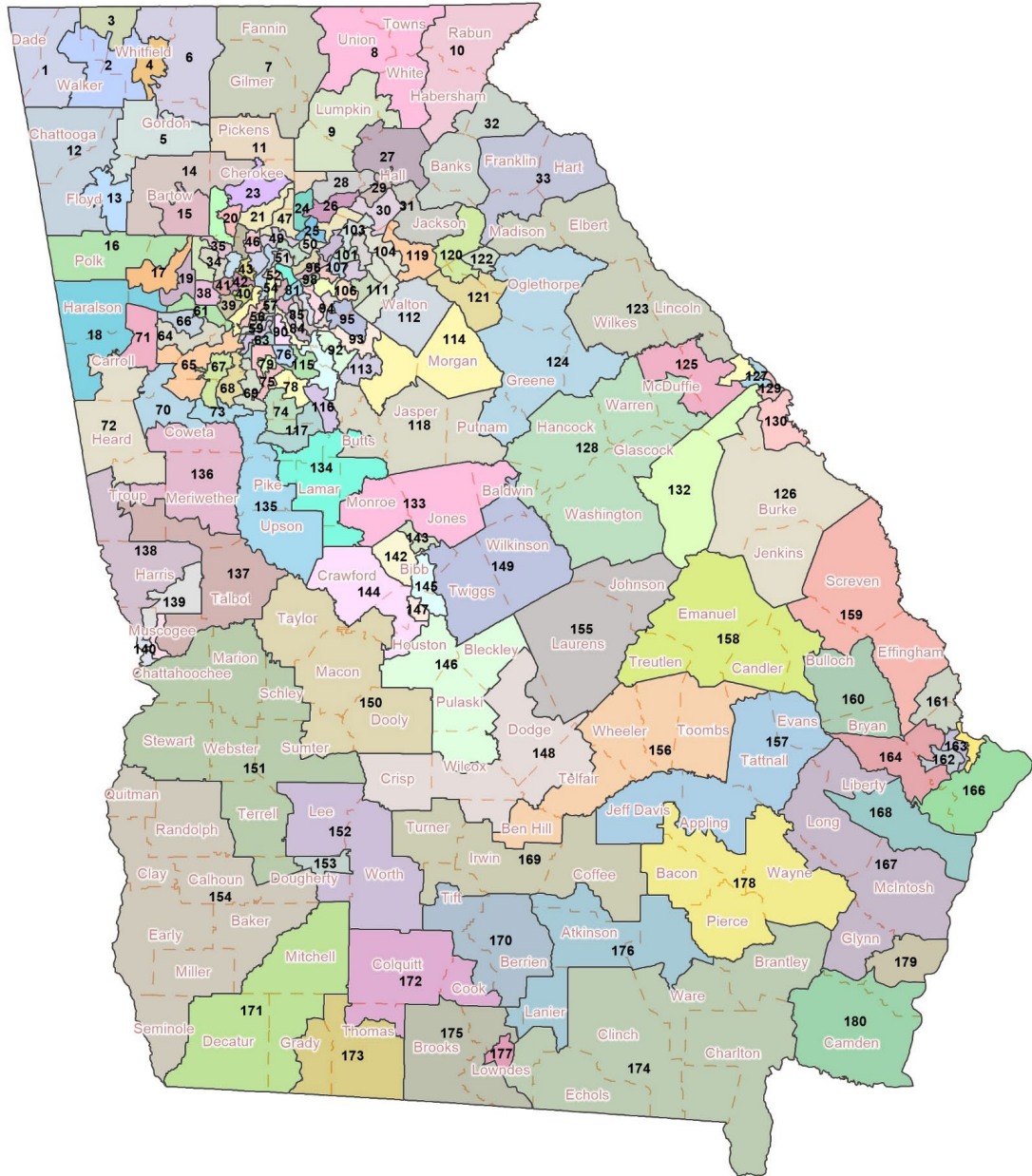
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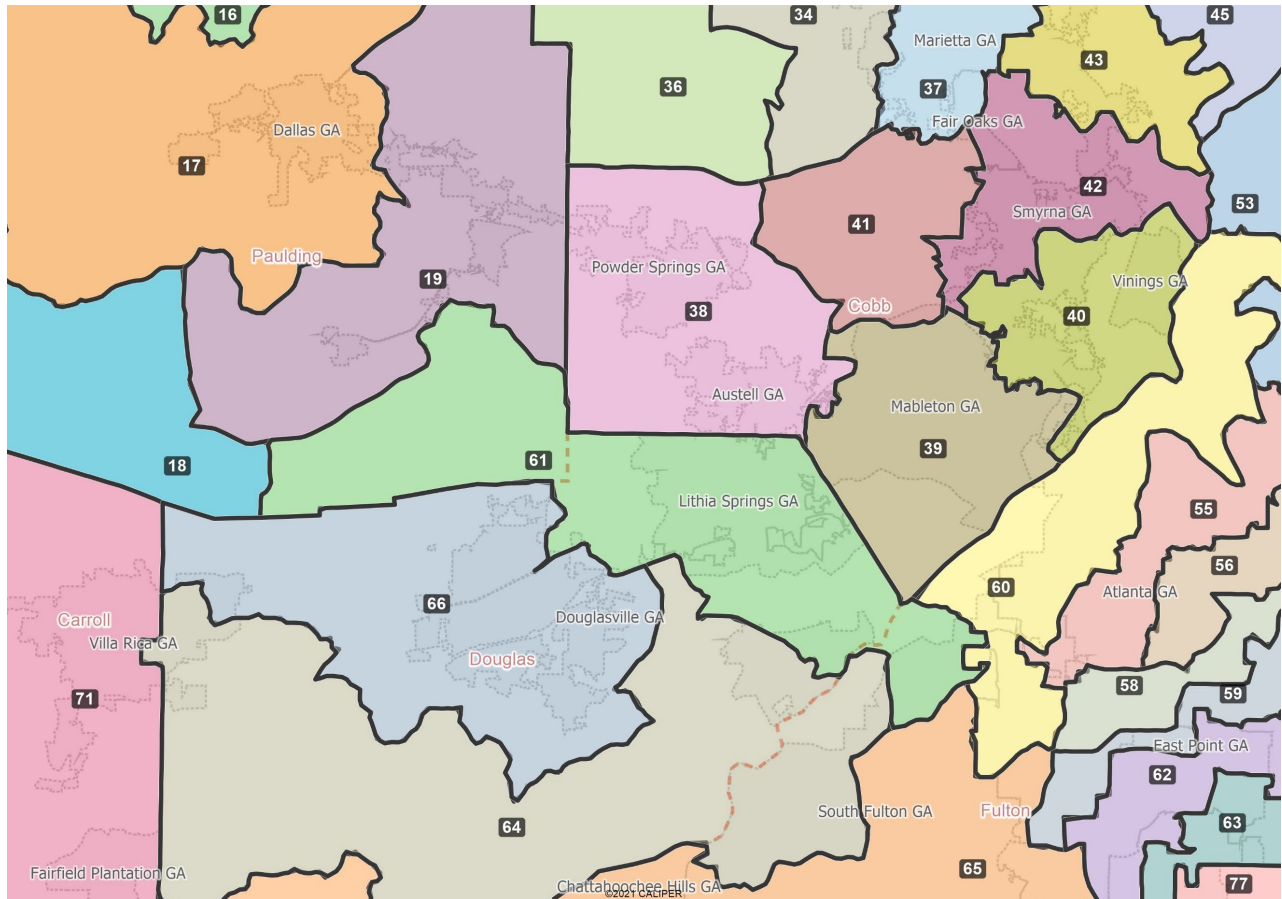
EXHIBIT A

Plaintiffs' Proposed State House Plan (Statewide)

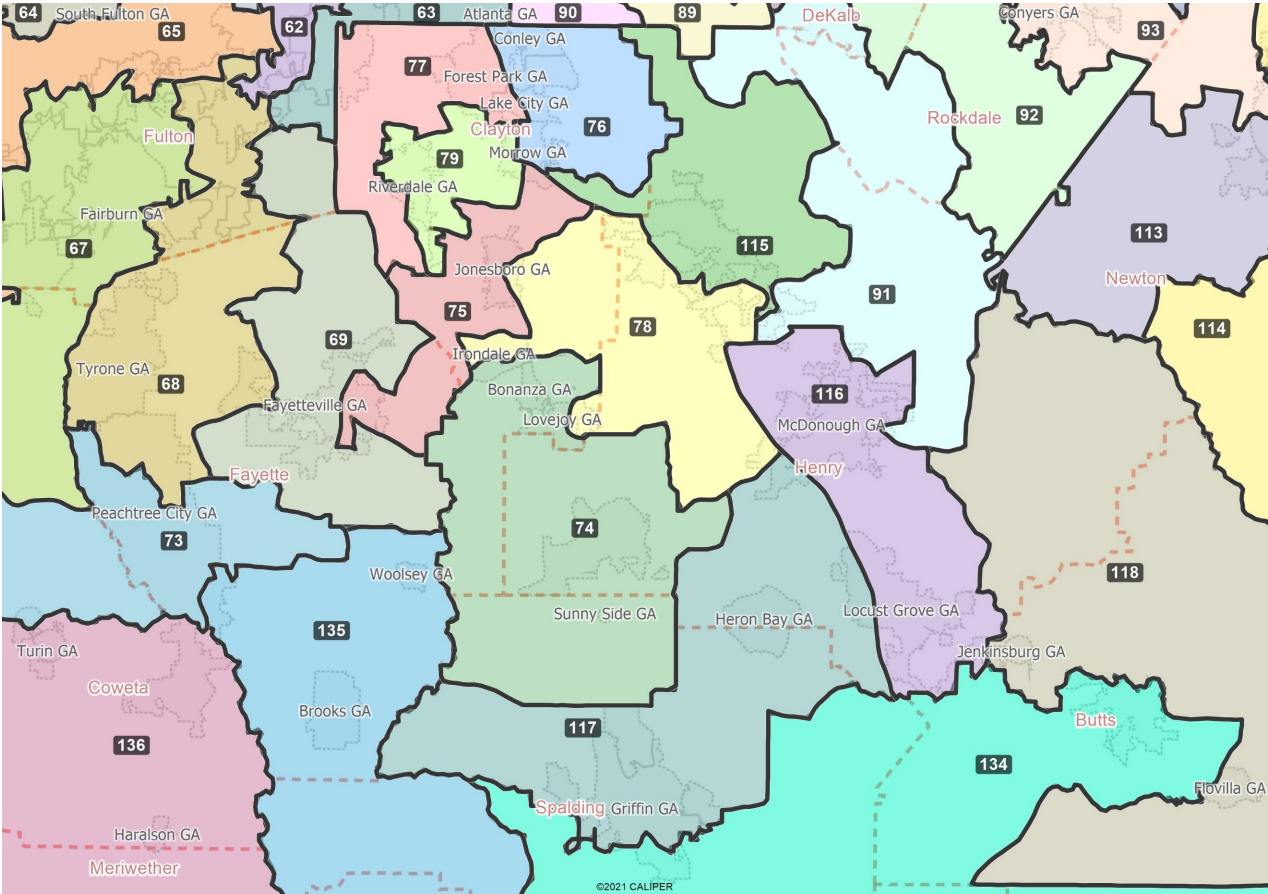


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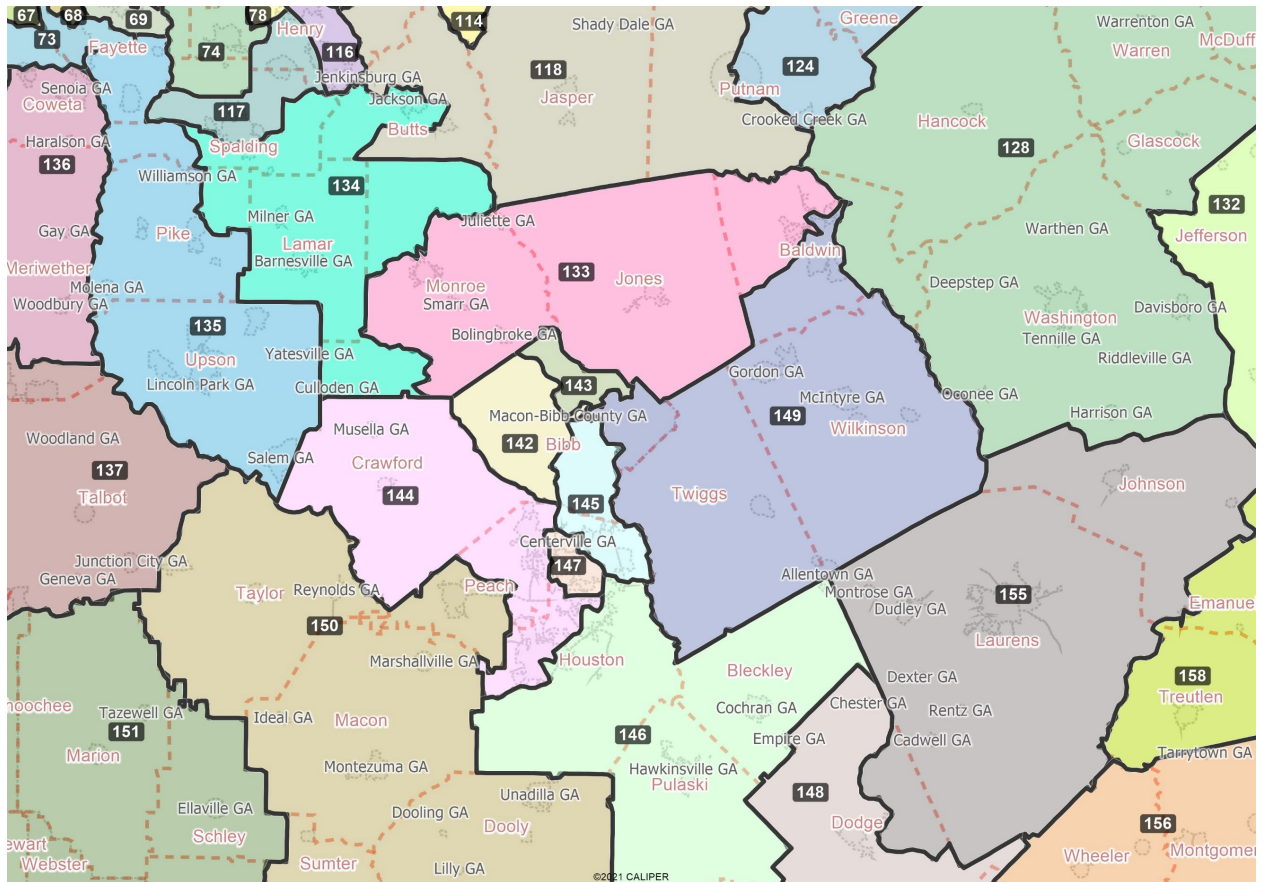
Plaintiffs' Proposed State House Plan (West Metro Atlanta)



Plaintiffs’ Proposed State House Plan (South Metro Atlanta)



Plaintiffs' Proposed State House Plan (Macon Area)



Population Summary

Tuesday, November 28, 20231:10 PM

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asnl]	[% 18+_AP_Asnl]
1	59,666	155	0.26%	46,801	78.44%	1,966	4.2%	989	2.11%	41,853	89.43%	356	0.76%
2	59,773	262	0.44%	46,159	77.22%	1,456	3.15%	3,496	7.57%	39,386	85.33%	606	1.31%
3	60,199	688	1.16%	46,716	77.6%	1,565	3.35%	1,381	2.96%	41,325	88.46%	858	1.84%
4	59,070	-441	-0.74%	42,798	72.45%	2,303	5.38%	18,887	44.13%	20,448	47.78%	648	1.51%
5	58,837	-674	-1.13%	44,623	75.84%	2,051	4.6%	5,631	12.62%	35,053	78.55%	661	1.48%
6	59,712	201	0.34%	45,152	75.62%	682	1.51%	5,402	11.96%	37,476	83%	328	0.73%
7	59,081	-430	-0.72%	48,771	82.55%	302	0.62%	2,698	5.53%	43,969	90.15%	329	0.67%
8	59,244	-267	-0.45%	49,612	83.74%	708	1.43%	1,358	2.74%	45,581	91.87%	382	0.77%
9	59,474	-37	-0.06%	48,273	81.17%	759	1.57%	2,286	4.74%	42,931	88.93%	624	1.29%
10	59,519	8	0.01%	47,164	79.24%	1,757	3.73%	4,736	10.04%	38,589	81.82%	869	1.84%
11	58,792	-719	-1.21%	45,396	77.21%	839	1.85%	1,921	4.23%	40,541	89.31%	625	1.38%
12	59,300	-211	-0.35%	46,487	78.39%	4,498	9.68%	2,859	6.15%	37,386	80.42%	583	1.25%
13	59,150	-361	-0.61%	45,176	76.38%	8,665	19.18%	4,897	10.84%	29,952	66.3%	752	1.66%
14	59,135	-376	-0.63%	45,511	76.96%	3,117	6.85%	2,675	5.88%	37,785	83.02%	499	1.1%
15	59,213	-298	-0.50%	45,791	77.33%	6,500	14.19%	4,426	9.67%	32,924	71.9%	775	1.69%
16	59,402	-109	-0.18%	44,009	74.09%	5,146	11.69%	3,791	8.61%	33,631	76.42%	452	1.03%
17	59,120	-391	-0.66%	42,761	72.33%	9,843	23.02%	2,969	6.94%	28,229	66.02%	830	1.94%
18	59,335	-176	-0.30%	45,159	76.11%	3,604	7.98%	1,078	2.39%	38,843	86.01%	399	0.88%
19	58,955	-556	-0.93%	44,299	75.14%	10,697	24.15%	3,013	6.8%	28,958	65.37%	756	1.71%
20	60,107	596	1.00%	45,725	76.07%	4,230	9.25%	4,197	9.18%	34,934	76.4%	1,274	2.79%
21	59,529	18	0.03%	44,931	75.48%	2,272	5.06%	3,343	7.44%	36,876	82.07%	1,121	2.49%
22	59,460	-51	-0.09%	45,815	77.05%	6,918	15.1%	5,301	11.57%	30,057	65.61%	2,252	4.92%
23	59,048	-463	-0.78%	44,254	74.95%	2,878	6.5%	6,298	14.23%	33,318	75.29%	752	1.7%
24	59,011	-500	-0.84%	41,814	70.86%	2,926	7%	4,315	10.32%	26,519	63.42%	7,206	17.23%
25	59,414	-97	-0.16%	42,520	71.57%	2,507	5.9%	2,164	5.09%	23,862	56.12%	13,354	31.41%

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asnl]	[% 18+_AP_Asnl]
26	59,248	-263	-0.44%	44,081	74.4%	1,767	4.01%	4,742	10.76%	30,066	68.21%	6,583	14.93%
27	58,795	-716	-1.20%	46,004	78.24%	1,698	3.69%	4,418	9.6%	38,005	82.61%	557	1.21%
28	58,972	-539	-0.91%	44,444	75.36%	1,747	3.93%	5,083	11.44%	35,271	79.36%	1,205	2.71%
29	59,200	-311	-0.52%	43,131	72.86%	5,861	13.59%	17,126	39.71%	18,239	42.29%	1,466	3.4%
30	59,266	-245	-0.41%	45,414	76.63%	3,678	8.1%	7,327	16.13%	32,016	70.5%	1,552	3.42%
31	59,901	390	0.66%	43,120	71.99%	3,265	7.57%	8,170	18.95%	29,604	68.65%	1,197	2.78%
32	59,145	-366	-0.62%	45,942	77.68%	3,659	7.96%	2,238	4.87%	38,122	82.98%	694	1.51%
33	59,187	-324	-0.54%	46,498	78.56%	5,207	11.2%	1,457	3.13%	38,246	82.25%	650	1.4%
34	59,875	364	0.61%	45,758	76.42%	7,169	15.67%	3,590	7.85%	31,678	69.23%	2,399	5.24%
35	59,889	378	0.64%	48,312	80.67%	13,722	28.4%	5,387	11.15%	25,909	53.63%	2,675	5.54%
36	59,994	483	0.81%	44,911	74.86%	7,626	16.98%	2,924	6.51%	31,783	70.77%	1,705	3.8%
37	59,176	-335	-0.56%	46,223	78.11%	13,027	28.18%	8,618	18.64%	21,382	46.26%	2,462	5.33%
38	59,317	-194	-0.33%	44,839	75.59%	24,318	54.23%	5,657	12.62%	13,498	30.1%	1,077	2.4%
39	59,381	-130	-0.22%	44,436	74.83%	24,569	55.29%	8,292	18.66%	10,429	23.47%	1,014	2.28%
40	59,044	-467	-0.78%	47,976	81.25%	15,821	32.98%	2,842	5.92%	24,534	51.14%	4,426	9.23%
41	60,122	611	1.03%	45,271	75.3%	17,816	39.35%	12,927	28.55%	12,502	27.62%	1,662	3.67%
42	59,620	109	0.18%	48,525	81.39%	16,353	33.7%	8,436	17.38%	18,923	39%	3,969	8.18%
43	59,464	-47	-0.08%	47,033	79.09%	12,476	26.53%	6,653	14.15%	21,781	46.31%	3,991	8.49%
44	60,002	491	0.83%	46,773	77.95%	5,635	12.05%	4,925	10.53%	31,659	67.69%	3,157	6.75%
45	59,738	227	0.38%	44,023	73.69%	2,324	5.28%	2,136	4.85%	32,991	74.94%	5,714	12.98%
46	59,108	-403	-0.68%	44,132	74.66%	3,560	8.07%	3,257	7.38%	33,016	74.81%	3,429	7.77%
47	59,126	-385	-0.65%	43,932	74.3%	4,709	10.72%	3,236	7.37%	28,066	63.89%	7,058	16.07%
48	59,003	-508	-0.85%	44,779	75.89%	5,279	11.79%	5,556	12.41%	27,658	61.77%	5,639	12.59%
49	59,153	-358	-0.60%	45,263	76.52%	3,813	8.42%	3,031	6.7%	32,354	71.48%	5,275	11.65%
50	59,523	12	0.02%	43,940	73.82%	5,450	12.4%	2,796	6.36%	19,496	44.37%	15,731	35.8%
51	58,952	-559	-0.94%	47,262	80.17%	11,193	23.68%	6,291	13.31%	25,679	54.33%	3,257	6.89%
52	59,811	300	0.50%	48,525	81.13%	7,758	15.99%	3,598	7.41%	26,755	55.14%	9,733	20.06%
53	59,953	442	0.74%	46,944	78.3%	6,819	14.53%	3,494	7.44%	33,426	71.2%	2,558	5.45%
54	60,083	572	0.96%	50,338	83.78%	7,789	15.47%	6,436	12.79%	31,705	62.98%	3,958	7.86%
55	59,971	460	0.77%	49,255	82.13%	27,279	55.38%	2,450	4.97%	17,490	35.51%	1,944	3.95%

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asnl]	[% 18+_AP_Asnl]
56	58,929	-582	-0.98%	52,757	89.53%	23,993	45.48%	3,082	5.84%	19,509	36.98%	5,978	11.33%
57	59,969	458	0.77%	52,097	86.87%	9,411	18.06%	4,143	7.95%	33,156	63.64%	4,792	9.2%
58	59,057	-454	-0.76%	50,514	85.53%	31,845	63.04%	2,562	5.07%	13,923	27.56%	2,040	4.04%
59	59,434	-77	-0.13%	49,179	82.75%	34,470	70.09%	2,177	4.43%	10,840	22.04%	1,791	3.64%
60	59,709	198	0.33%	45,490	76.19%	29,061	63.88%	2,324	5.11%	12,778	28.09%	1,249	2.75%
61	59,648	137	0.23%	45,279	75.91%	22,748	50.24%	4,211	9.3%	17,060	37.68%	705	1.56%
62	59,450	-61	-0.10%	46,426	78.09%	33,548	72.26%	3,172	6.83%	8,852	19.07%	875	1.88%
63	59,381	-130	-0.22%	45,043	75.85%	31,229	69.33%	4,173	9.26%	8,658	19.22%	908	2.02%
64	58,950	-561	-0.94%	44,212	75%	23,651	53.49%	3,182	7.2%	16,198	36.64%	821	1.86%
65	59,240	-271	-0.46%	44,902	75.8%	28,441	63.34%	1,463	3.26%	14,170	31.56%	560	1.25%
66	58,961	-550	-0.92%	43,907	74.47%	23,657	53.88%	4,102	9.34%	14,723	33.53%	1,052	2.4%
67	59,135	-376	-0.63%	44,299	74.91%	26,099	58.92%	3,435	7.75%	13,670	30.86%	833	1.88%
68	59,477	-34	-0.06%	44,835	75.38%	24,994	55.75%	2,837	6.33%	15,216	33.94%	1,486	3.31%
69	59,540	29	0.05%	46,082	77.4%	27,773	60.27%	2,349	5.1%	14,089	30.57%	1,526	3.31%
70	59,121	-390	-0.66%	45,249	76.54%	12,591	27.83%	3,601	7.96%	27,007	59.69%	1,242	2.74%
71	59,538	27	0.05%	44,582	74.88%	8,879	19.92%	2,755	6.18%	31,118	69.8%	640	1.44%
72	59,660	149	0.25%	46,229	77.49%	9,642	20.86%	3,209	6.94%	32,007	69.24%	545	1.18%
73	59,216	-295	-0.50%	45,201	76.33%	5,210	11.53%	3,167	7.01%	33,100	73.23%	2,903	6.42%
74	60,305	794	1.33%	44,484	73.77%	27,244	61.24%	3,547	7.97%	12,693	28.53%	879	1.98%
75	60,085	574	0.96%	44,638	74.29%	31,249	70.01%	4,544	10.18%	7,108	15.92%	1,788	4.01%
76	59,759	248	0.42%	44,371	74.25%	29,832	67.23%	5,872	13.23%	4,665	10.51%	4,043	9.11%
77	59,242	-269	-0.45%	44,207	74.62%	33,655	76.13%	5,392	12.2%	3,349	7.58%	2,011	4.55%
78	59,850	339	0.57%	46,653	77.95%	26,974	57.82%	3,501	7.5%	12,451	26.69%	3,650	7.82%
79	59,500	-11	-0.02%	43,223	72.64%	30,942	71.59%	6,929	16.03%	3,090	7.15%	2,546	5.89%
80	59,461	-50	-0.08%	44,784	75.32%	6,350	14.18%	10,356	23.12%	21,330	47.63%	6,373	14.23%
81	59,007	-504	-0.85%	46,259	78.4%	10,099	21.83%	9,676	20.92%	21,746	47.01%	4,470	9.66%
82	59,724	213	0.36%	50,238	84.12%	8,455	16.83%	3,410	6.79%	31,380	62.46%	6,316	12.57%
83	59,416	-95	-0.16%	46,581	78.4%	7,044	15.12%	13,260	28.47%	22,311	47.9%	3,630	7.79%
84	59,862	351	0.59%	47,350	79.1%	34,877	73.66%	1,400	2.96%	10,081	21.29%	974	2.06%
85	59,373	-138	-0.23%	46,308	78%	29,041	62.71%	2,742	5.92%	9,022	19.48%	5,420	11.7%

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asnl]	[% 18+_AP_Asnl]
86	59,205	-306	-0.51%	44,614	75.36%	33,485	75.05%	1,912	4.29%	5,391	12.08%	3,875	8.69%
87	59,709	198	0.33%	45,615	76.4%	33,336	73.08%	3,051	6.69%	6,159	13.5%	3,084	6.76%
88	59,689	178	0.30%	46,073	77.19%	29,187	63.35%	4,595	9.97%	8,432	18.3%	3,817	8.28%
89	59,866	355	0.60%	46,198	77.17%	28,890	62.54%	1,581	3.42%	14,355	31.07%	1,247	2.7%
90	59,812	301	0.51%	48,015	80.28%	28,082	58.49%	2,045	4.26%	16,315	33.98%	1,296	2.7%
91	60,252	741	1.25%	45,919	76.21%	27,774	60.48%	1,703	3.71%	14,991	32.65%	1,108	2.41%
92	60,273	762	1.28%	46,551	77.23%	32,022	68.79%	2,177	4.68%	11,196	24.05%	969	2.08%
93	59,629	118	0.20%	44,333	74.35%	29,085	65.61%	4,262	9.61%	10,145	22.88%	717	1.62%
94	59,211	-300	-0.50%	44,809	75.68%	30,935	69.04%	3,267	7.29%	8,255	18.42%	2,430	5.42%
95	60,030	519	0.87%	44,948	74.88%	30,183	67.15%	3,567	7.94%	9,814	21.83%	1,348	3%
96	59,515	4	0.01%	44,671	75.06%	10,273	23%	16,093	36.03%	9,078	20.32%	9,169	20.53%
97	59,072	-439	-0.74%	46,339	78.44%	12,405	26.77%	8,910	19.23%	16,887	36.44%	7,971	17.2%
98	59,998	487	0.82%	42,734	71.23%	9,934	23.25%	22,549	52.77%	4,981	11.66%	5,514	12.9%
99	59,850	339	0.57%	45,004	75.19%	6,622	14.71%	3,901	8.67%	18,948	42.1%	15,175	33.72%
100	60,030	519	0.87%	42,669	71.08%	4,273	10.01%	4,259	9.98%	25,197	59.05%	8,243	19.32%
101	59,938	427	0.72%	46,584	77.72%	11,269	24.19%	8,499	18.24%	18,698	40.14%	7,896	16.95%
102	58,959	-552	-0.93%	42,968	72.88%	16,164	37.62%	9,170	21.34%	13,169	30.65%	4,449	10.35%
103	60,197	686	1.15%	44,399	73.76%	7,454	16.79%	7,499	16.89%	23,273	52.42%	5,766	12.99%
104	59,362	-149	-0.25%	43,306	72.95%	7,373	17.03%	4,826	11.14%	27,265	62.96%	3,112	7.19%
105	59,344	-167	-0.28%	43,474	73.26%	12,628	29.05%	7,286	16.76%	18,145	41.74%	5,197	11.95%
106	59,112	-399	-0.67%	43,890	74.25%	15,918	36.27%	4,890	11.14%	18,090	41.22%	4,644	10.58%
107	59,702	191	0.32%	44,509	74.55%	13,186	29.63%	13,838	31.09%	9,775	21.96%	7,842	17.62%
108	59,577	66	0.11%	44,308	74.37%	8,132	18.35%	8,047	18.16%	19,214	43.36%	8,537	19.27%
109	59,630	119	0.20%	44,140	74.02%	14,352	32.51%	15,943	36.12%	6,816	15.44%	7,353	16.66%
110	59,951	440	0.74%	43,226	72.1%	20,400	47.19%	4,535	10.49%	15,812	36.58%	2,350	5.44%
111	60,009	498	0.84%	44,096	73.48%	9,828	22.29%	3,899	8.84%	28,221	64%	1,388	3.15%
112	59,349	-162	-0.27%	45,120	76.02%	8,667	19.21%	1,481	3.28%	33,268	73.73%	704	1.56%
113	58,852	-659	-1.11%	43,632	74.14%	26,100	59.82%	2,828	6.48%	13,698	31.39%	605	1.39%
114	58,702	-809	-1.36%	45,011	76.68%	11,614	25.8%	1,725	3.83%	30,500	67.76%	449	1%
115	59,798	287	0.48%	45,294	75.75%	26,534	58.58%	4,405	9.73%	12,385	27.34%	1,753	3.87%

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asnl]	[% 18+_AP_Asnl]
116	59,905	394	0.66%	44,002	73.45%	23,543	53.5%	3,196	7.26%	16,018	36.4%	956	2.17%
117	58,775	-736	-1.24%	44,537	75.78%	22,272	50.01%	2,423	5.44%	18,500	41.54%	893	2.01%
118	60,358	847	1.42%	45,610	75.57%	8,551	18.75%	1,853	4.06%	33,671	73.82%	379	0.83%
119	58,947	-564	-0.95%	44,005	74.65%	5,935	13.49%	4,593	10.44%	30,715	69.8%	1,852	4.21%
120	58,982	-529	-0.89%	46,767	79.29%	6,679	14.28%	3,318	7.09%	33,645	71.94%	2,239	4.79%
121	59,127	-384	-0.65%	46,598	78.81%	4,454	9.56%	2,595	5.57%	35,475	76.13%	3,123	6.7%
122	59,632	121	0.20%	48,840	81.9%	13,878	28.42%	5,713	11.7%	26,762	54.8%	1,680	3.44%
123	59,282	-229	-0.38%	46,572	78.56%	11,307	24.28%	2,007	4.31%	31,695	68.06%	657	1.41%
124	59,221	-290	-0.49%	47,638	80.44%	12,186	25.58%	2,939	6.17%	30,971	65.01%	714	1.5%
125	60,137	626	1.05%	43,812	72.85%	10,376	23.68%	3,358	7.66%	27,614	63.03%	1,726	3.94%
126	59,260	-251	-0.42%	45,497	76.78%	24,782	54.47%	1,440	3.17%	18,185	39.97%	585	1.29%
127	58,678	-833	-1.40%	45,889	78.2%	8,500	18.52%	2,190	4.77%	31,263	68.13%	3,054	6.66%
128	58,864	-647	-1.09%	46,488	78.98%	23,434	50.41%	792	1.7%	21,612	46.49%	252	0.54%
129	58,829	-682	-1.15%	46,873	79.68%	25,717	54.87%	1,996	4.26%	17,419	37.16%	1,428	3.05%
130	59,203	-308	-0.52%	44,019	74.35%	26,372	59.91%	1,697	3.86%	14,854	33.74%	683	1.55%
131	58,890	-621	-1.04%	42,968	72.96%	7,572	17.62%	2,522	5.87%	29,286	68.16%	2,868	6.67%
132	59,142	-369	-0.62%	46,752	79.05%	24,471	52.34%	3,648	7.8%	16,658	35.63%	1,647	3.52%
133	59,650	139	0.23%	46,507	77.97%	12,097	26.01%	869	1.87%	32,240	69.32%	638	1.37%
134	60,345	834	1.40%	47,600	78.88%	11,530	24.22%	1,292	2.71%	33,477	70.33%	455	0.96%
135	60,318	807	1.36%	46,321	76.79%	8,135	17.56%	1,083	2.34%	35,380	76.38%	681	1.47%
136	59,298	-213	-0.36%	45,367	76.51%	13,005	28.67%	1,652	3.64%	28,990	63.9%	826	1.82%
137	59,551	40	0.07%	45,358	76.17%	23,647	52.13%	2,033	4.48%	18,517	40.82%	994	2.19%
138	58,912	-599	-1.01%	45,684	77.55%	8,824	19.32%	1,514	3.31%	33,050	72.34%	1,369	3%
139	59,010	-501	-0.84%	45,522	77.14%	9,227	20.27%	2,896	6.36%	30,132	66.19%	2,317	5.09%
140	59,294	-217	-0.36%	44,411	74.9%	25,596	57.63%	3,563	8.02%	14,080	31.7%	855	1.93%
141	59,019	-492	-0.83%	44,677	75.7%	25,672	57.46%	2,927	6.55%	14,194	31.77%	1,594	3.57%
142	59,320	-191	-0.32%	45,212	76.22%	22,669	50.14%	1,664	3.68%	19,423	42.96%	1,225	2.71%
143	59,122	-389	-0.65%	45,811	77.49%	23,200	50.64%	1,666	3.64%	19,139	41.78%	1,417	3.09%
144	59,016	-495	-0.83%	45,236	76.65%	11,484	25.39%	1,903	4.21%	29,364	64.91%	1,648	3.64%
145	59,668	157	0.26%	44,547	74.66%	22,443	50.38%	3,280	7.36%	17,466	39.21%	852	1.91%

Population Summary

GA_House_Remedies_Plaintiffs

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Wht]	[% NH18+_Wht]	[18+_AP_Asn]	[% 18+_AP_Asn]
146	59,806	295	0.50%	45,164	75.52%	11,025	24.41%	1,701	3.77%	30,650	67.86%	1,050	2.32%
147	58,689	-822	-1.38%	44,508	75.84%	13,588	30.53%	2,921	6.56%	25,018	56.21%	2,298	5.16%
148	59,876	365	0.61%	47,443	79.24%	17,357	36.58%	2,844	5.99%	26,772	56.43%	373	0.79%
149	59,392	-119	-0.20%	47,970	80.77%	24,719	51.53%	1,314	2.74%	20,897	43.56%	498	1.04%
150	59,276	-235	-0.39%	47,050	79.37%	25,202	53.56%	2,885	6.13%	18,026	38.31%	652	1.39%
151	60,059	548	0.92%	46,973	78.21%	19,920	42.41%	3,421	7.28%	22,169	47.2%	916	1.95%
152	60,134	623	1.05%	46,026	76.54%	11,993	26.06%	1,077	2.34%	31,272	67.94%	885	1.92%
153	59,299	-212	-0.36%	45,692	77.05%	31,047	67.95%	1,164	2.55%	12,637	27.66%	611	1.34%
154	59,994	483	0.81%	47,273	78.8%	25,914	54.82%	789	1.67%	19,967	42.24%	263	0.56%
155	60,134	623	1.05%	46,296	76.99%	16,308	35.23%	1,032	2.23%	27,970	60.42%	533	1.15%
156	59,444	-67	-0.11%	45,867	77.16%	13,875	30.25%	3,156	6.88%	27,940	60.92%	374	0.82%
157	59,957	446	0.75%	45,311	75.57%	11,176	24.67%	4,062	8.96%	29,216	64.48%	349	0.77%
158	59,440	-71	-0.12%	45,549	76.63%	14,209	31.19%	2,057	4.52%	28,334	62.21%	404	0.89%
159	59,895	384	0.65%	44,871	74.92%	10,995	24.5%	1,290	2.87%	31,137	69.39%	429	0.96%
160	59,935	424	0.71%	48,057	80.18%	10,859	22.6%	2,421	5.04%	32,909	68.48%	1,100	2.29%
161	60,097	586	0.98%	44,371	73.83%	12,042	27.14%	3,028	6.82%	26,692	60.16%	1,748	3.94%
162	60,308	797	1.34%	46,733	77.49%	20,435	43.73%	4,478	9.58%	18,984	40.62%	2,319	4.96%
163	60,123	612	1.03%	48,461	80.6%	22,045	45.49%	3,578	7.38%	20,317	41.92%	2,063	4.26%
164	60,101	590	0.99%	45,851	76.29%	10,760	23.47%	3,893	8.49%	27,792	60.61%	2,441	5.32%
165	59,978	467	0.78%	48,247	80.44%	24,282	50.33%	2,572	5.33%	18,901	39.18%	2,009	4.16%
166	60,242	731	1.23%	47,580	78.98%	2,698	5.67%	1,938	4.07%	40,307	84.71%	1,627	3.42%
167	59,493	-18	-0.03%	44,140	74.19%	9,835	22.28%	3,269	7.41%	29,113	65.96%	916	2.08%
168	60,147	636	1.07%	44,867	74.6%	20,757	46.26%	4,623	10.3%	17,627	39.29%	1,516	3.38%
169	59,138	-373	-0.63%	45,267	76.54%	13,147	29.04%	3,466	7.66%	27,591	60.95%	491	1.08%
170	60,116	605	1.02%	45,316	75.38%	10,976	24.22%	3,920	8.65%	29,080	64.17%	663	1.46%
171	59,237	-274	-0.46%	45,969	77.6%	18,202	39.6%	2,127	4.63%	24,755	53.85%	349	0.76%
172	59,961	450	0.76%	44,756	74.64%	10,439	23.32%	6,007	13.42%	27,315	61.03%	440	0.98%
173	59,743	232	0.39%	45,292	75.81%	16,428	36.27%	2,424	5.35%	25,217	55.68%	498	1.1%
174	59,852	341	0.57%	45,760	76.46%	7,950	17.37%	3,641	7.96%	33,060	72.25%	385	0.84%
175	59,993	482	0.81%	44,704	74.52%	10,805	24.17%	2,250	5.03%	29,725	66.49%	1,069	2.39%

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Whtl]	[% NH18+_Whtl]	[18+_AP_Asn]	[% 18+_AP_Asn]
176	59,470	-41	-0.07%	44,991	75.65%	10,206	22.68%	3,708	8.24%	29,763	66.15%	569	1.26%
177	59,992	481	0.81%	46,014	76.7%	24,793	53.88%	2,814	6.12%	17,082	37.12%	890	1.93%
178	59,877	366	0.62%	45,638	76.22%	6,750	14.79%	2,347	5.14%	35,503	77.79%	333	0.73%
179	59,356	-155	-0.26%	47,156	79.45%	12,745	27.03%	3,009	6.38%	30,035	63.69%	691	1.47%
180	59,412	-99	-0.17%	45,362	76.35%	8,261	18.21%	2,550	5.62%	32,283	71.17%	1,143	2.52%

Total: 10,711,908

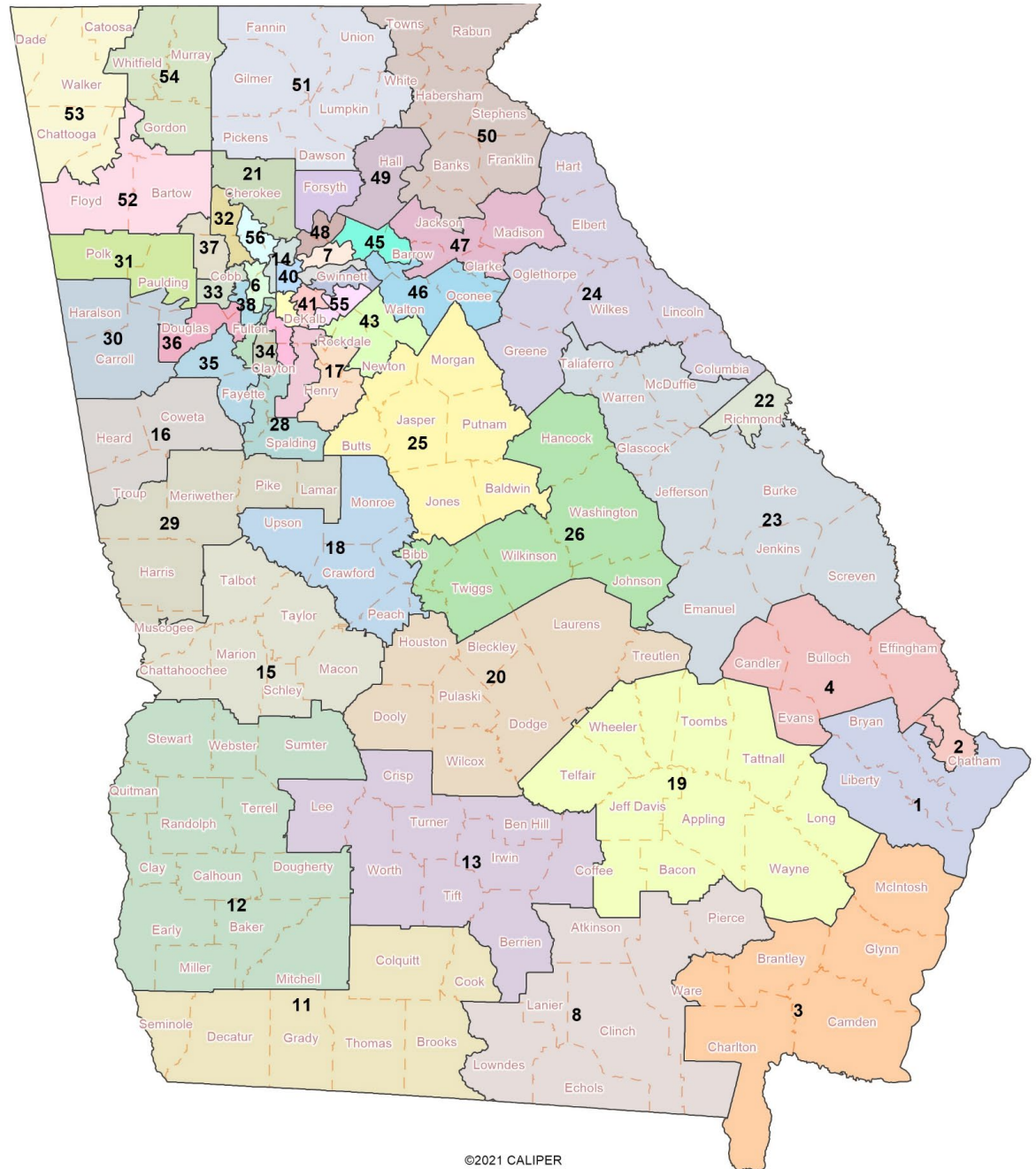
Ideal District: 59,511

Summary Statistics:

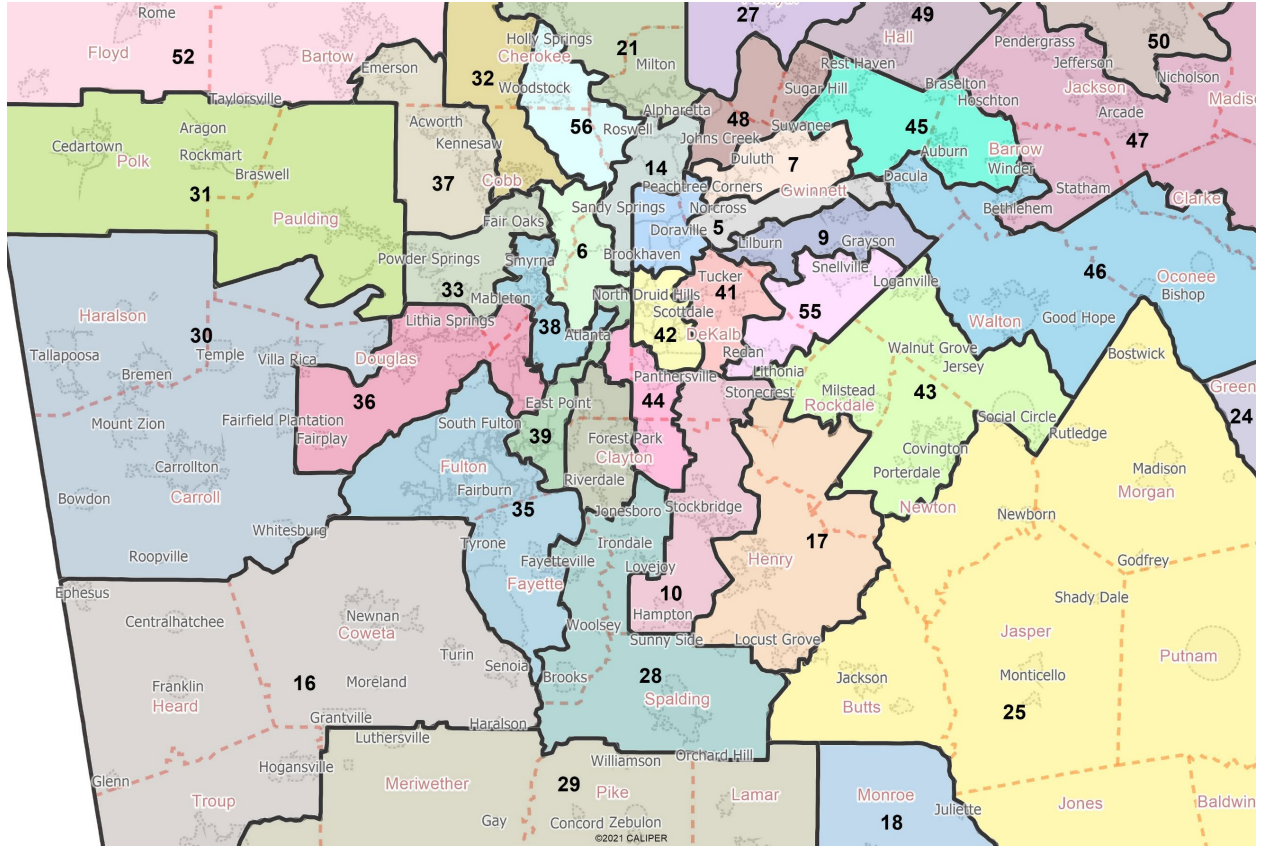
Population Range:	58,678 to 60,358
Ratio Range:	0.03
Absolute Range:	-833 to 847
Absolute Overall Range:	1,680
Relative Range:	-1.40% to 1.42%
Relative Overall Range:	2.82%
Absolute Mean Deviation:	367.63
Relative Mean Deviation:	0.62%
Standard Deviation:	426.78

EXHIBIT B

Plaintiffs' Proposed State Senate Plan (Statewide)



Plaintiffs' Proposed State Senate Plan (South Metro Atlanta)



Population Summary

Tuesday, November 28, 20231:12 PM

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Bl]	[% 18+_AP_Bl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Wh]	[% NH18+_Wh]	[18+_AP_Asn]	[% 18+_AP_Asn]
1	191,402	118	0.06%	145,428	75.98%	36,468	25.08%	10,973	7.55%	90,150	61.99%	5,390	3.71%
2	190,408	-876	-0.46%	150,843	79.22%	70,688	46.86%	11,281	7.48%	60,650	40.21%	6,707	4.45%
3	191,212	-72	-0.04%	148,915	77.88%	31,545	21.18%	9,186	6.17%	102,574	68.88%	2,691	1.81%
4	191,098	-186	-0.10%	146,443	76.63%	34,217	23.37%	8,088	5.52%	97,792	66.78%	3,578	2.44%
5	191,921	637	0.33%	139,394	72.63%	41,736	29.94%	58,087	41.67%	21,872	15.69%	18,364	13.17%
6	191,401	117	0.06%	155,781	81.39%	37,231	23.9%	12,836	8.24%	90,024	57.79%	12,566	8.07%
7	189,709	-1,575	-0.82%	147,425	77.71%	31,601	21.44%	24,417	16.56%	55,780	37.84%	34,816	23.62%
8	192,396	1,112	0.58%	145,144	75.44%	44,098	30.38%	9,019	6.21%	87,232	60.1%	2,525	1.74%
9	192,915	1,631	0.85%	142,054	73.64%	41,948	29.53%	26,669	18.77%	50,868	35.81%	21,922	15.43%
10	192,898	1,614	0.84%	147,884	76.66%	105,671	71.46%	7,661	5.18%	29,039	19.64%	5,313	3.59%
11	189,976	-1,308	-0.68%	144,597	76.11%	44,887	31.04%	10,989	7.6%	85,275	58.97%	1,357	0.94%
12	190,819	-465	-0.24%	149,154	78.17%	86,465	57.97%	5,197	3.48%	54,752	36.71%	1,791	1.2%
13	189,326	-1,958	-1.02%	144,141	76.13%	38,871	26.97%	8,661	6.01%	92,398	64.1%	2,142	1.49%
14	192,533	1,249	0.65%	155,340	80.68%	29,470	18.97%	18,844	12.13%	88,706	57.1%	16,127	10.38%
15	189,446	-1,838	-0.96%	144,506	76.28%	78,040	54%	9,525	6.59%	52,771	36.52%	3,061	2.12%
16	192,222	938	0.49%	146,093	76%	28,169	19.28%	8,549	5.85%	102,353	70.06%	3,980	2.72%
17	191,038	-246	-0.13%	142,845	74.77%	72,430	50.71%	8,184	5.73%	57,556	40.29%	3,388	2.37%
18	191,838	554	0.29%	150,205	78.3%	45,670	30.41%	6,771	4.51%	91,155	60.69%	4,476	2.98%
19	192,316	1,032	0.54%	146,131	75.98%	37,589	25.72%	12,241	8.38%	93,506	63.99%	1,243	0.85%
20	192,588	1,304	0.68%	147,033	76.35%	45,991	31.28%	5,138	3.49%	90,729	61.71%	3,332	2.27%
21	192,572	1,288	0.67%	145,120	75.36%	10,823	7.46%	12,721	8.77%	107,202	73.87%	11,151	7.68%
22	193,163	1,879	0.98%	150,450	77.89%	85,009	56.5%	8,049	5.35%	51,728	34.38%	4,518	3%
23	190,344	-940	-0.49%	144,113	75.71%	51,133	35.48%	6,508	4.52%	81,988	56.89%	2,669	1.85%
24	192,674	1,390	0.73%	148,602	77.13%	29,503	19.85%	6,539	4.4%	103,744	69.81%	6,066	4.08%
25	192,887	1,603	0.84%	151,684	78.64%	43,438	28.64%	4,505	2.97%	99,487	65.59%	1,623	1.07%

Population Summary

GA_Senate_Remedies_Plaintiffs

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Blkl]	[% 18+_AP_Blkl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Wht]	[% NH18+_Wht]	[18+_AP_Asn]	[% 18+_AP_Asn]
26	189,945	-1,339	-0.70%	145,744	76.73%	83,056	56.99%	6,181	4.24%	53,346	36.6%	1,920	1.32%
27	190,676	-608	-0.32%	139,196	73%	6,961	5%	14,200	10.2%	99,531	71.5%	15,279	10.98%
28	191,266	-18	-0.01%	146,626	76.66%	76,924	52.46%	9,819	6.7%	54,616	37.25%	4,254	2.9%
29	192,161	877	0.46%	148,312	77.18%	37,280	25.14%	6,001	4.05%	97,503	65.74%	4,954	3.34%
30	191,475	191	0.10%	145,077	75.77%	30,346	20.92%	8,847	6.1%	100,699	69.41%	1,895	1.31%
31	192,560	1,276	0.67%	142,251	73.87%	29,440	20.7%	10,551	7.42%	97,094	68.26%	2,218	1.56%
32	192,448	1,164	0.61%	149,879	77.88%	22,274	14.86%	15,808	10.55%	98,589	65.78%	9,395	6.27%
33	192,694	1,410	0.74%	146,415	75.98%	62,897	42.96%	33,570	22.93%	44,286	30.25%	4,274	2.92%
34	190,178	-1,106	-0.58%	140,508	73.88%	102,933	73.26%	18,812	13.39%	13,438	9.56%	5,715	4.07%
35	191,803	519	0.27%	145,065	75.63%	81,862	56.43%	8,991	6.2%	48,293	33.29%	5,030	3.47%
36	189,616	-1,668	-0.87%	143,290	75.57%	89,003	62.11%	13,024	9.09%	38,031	26.54%	2,463	1.72%
37	192,671	1,387	0.73%	147,779	76.7%	28,484	19.27%	12,836	8.69%	96,596	65.37%	7,032	4.76%
38	191,306	22	0.01%	155,093	81.07%	80,335	51.8%	11,322	7.3%	51,184	33%	11,438	7.37%
39	190,738	-546	-0.29%	155,601	81.58%	95,245	61.21%	8,984	5.77%	44,428	28.55%	6,694	4.3%
40	190,544	-740	-0.39%	147,000	77.15%	28,277	19.24%	31,782	21.62%	68,121	46.34%	17,728	12.06%
41	191,865	581	0.30%	146,218	76.21%	91,538	62.6%	9,768	6.68%	31,310	21.41%	13,377	9.15%
42	190,940	-344	-0.18%	153,952	80.63%	47,383	30.78%	13,303	8.64%	79,111	51.39%	12,738	8.27%
43	192,462	1,178	0.62%	144,592	75.13%	73,983	51.17%	10,206	7.06%	56,728	39.23%	2,203	1.52%
44	192,865	1,581	0.83%	154,705	80.21%	89,779	58.03%	11,893	7.69%	44,078	28.49%	8,588	5.55%
45	190,692	-592	-0.31%	140,706	73.79%	26,149	18.58%	18,367	13.05%	78,049	55.47%	16,444	11.69%
46	190,312	-972	-0.51%	146,713	77.09%	24,793	16.9%	10,255	6.99%	102,559	69.9%	6,609	4.5%
47	190,607	-677	-0.35%	146,599	76.91%	25,543	17.42%	14,032	9.57%	98,893	67.46%	4,974	3.39%
48	190,123	-1,161	-0.61%	136,995	72.06%	12,968	9.47%	9,584	7%	71,575	52.25%	41,142	30.03%
49	189,355	-1,929	-1.01%	144,123	76.11%	11,475	7.96%	31,557	21.9%	94,600	65.64%	3,776	2.62%
50	189,320	-1,964	-1.03%	148,799	78.6%	8,341	5.61%	13,060	8.78%	121,337	81.54%	2,219	1.49%
51	190,167	-1,117	-0.58%	155,571	81.81%	1,876	1.21%	6,745	4.34%	140,394	90.24%	1,408	0.91%
52	190,799	-485	-0.25%	146,620	76.85%	19,120	13.04%	12,083	8.24%	109,583	74.74%	2,099	1.43%
53	190,236	-1,048	-0.55%	148,201	77.9%	7,558	5.1%	4,781	3.23%	129,390	87.31%	1,814	1.22%
54	192,443	1,159	0.61%	143,843	74.75%	5,450	3.79%	32,559	22.64%	100,668	69.98%	1,973	1.37%
55	189,313	-1,971	-1.03%	141,028	74.49%	93,082	66%	12,301	8.72%	28,941	20.52%	6,839	4.85%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[18+_AP_Bl]	[% 18+_AP_Bl]	[H18+_Pop]	[% H18+_Pop]	[NH18+_Wh]	[% NH18+_Wh]	[18+_AP_Asn]	[% 18+_AP_Asn]
56	191,226	-58	-0.03%	144,448	75.54%	10,940	7.57%	11,058	7.66%	110,031	76.17%	9,296	6.44%

Total: 10,711,908
Ideal District: 191,284

Summary Statistics:	
Population Range:	189,313 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,971 to 1,879
Absolute Overall Range:	3,850
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	993.18
Relative Mean Deviation:	0.52%
Standard Deviation:	1,144.32