

EXHIBIT 6

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Norther Division)

WICOMICO COUNTY BRANCH
OF THE NAACP, et al.,

Plaintiffs,

v.

Civil Action No. 1:23-cv-03325-MJM

WICOMICO COUNTY, MARYLAND,
et al.,

Defendant.

DECLARATION OF DR. KASSRA A.R. OSKOOII

June 26, 2024

I. Executive Summary

1. I am an Associate Professor and Provost Teaching Fellow in the department of Political Science and International Relations at the University of Delaware. I have been engaged in this matter by counsel for Wicomico County NAACP, Caucus of African American Leaders, Watchmen with One Voice Ministerial Alliance, and the individual plaintiffs in this case to conduct a racially polarized voting (“RPV”) analysis related to their challenge to the hybrid five district/two at-large election system used for the Wicomico County Council and Wicomico County Board of Elections.
2. I was retained to examine whether racially polarized voting exists in Wicomico County. Specifically, I was asked to examine whether the Black¹ population in Wicomico County is politically cohesive and whether the White population votes sufficiently as a bloc to enable White voters to usually defeat Black-preferred candidates. The framework I used for examining racially polarized voting was established in the United States Supreme Court case *Thornburg v. Gingles*, 478 U.S. 30 (1986), numerous subsequent cases, and the factors set forth in the U.S. Senate Report accompanying 1982 amendments to the Voting Rights Act.
3. My opinions on White bloc voting and Black cohesion are based on a careful analysis of contested general and primary countywide election results from 2012 to 2022, including endogenous (i.e., Wicomico County only contests) and exogenous (i.e., statewide and federal contests that include Wicomico County) elections featuring Black candidates. To examine the

¹ The terms “Black” and “African-American” are used interchangeably for purposes of this report.

presence or absence of RPV, I rely on two well-established and rigorous statistical methods to estimate voting patterns by race: the Iterative Ecological Inference (“EI”) method and the EI Rows by Columns (“RxC”) method. The statistical methods I rely on to estimate vote choice by race are agnostic as to *why* voters support or oppose different candidates; the analysis simply shows *which* candidates different groups of voters prefer.

4. To conduct RPV analyses, I collected data from two official sources. First, I obtained election returns by voting precincts from the Maryland State Board of Elections Data Files.² Second, I obtained demographic data from the 2010 and 2020 U.S. Census Redistricting Dataset (P.L. 94-171). Election data by precinct were then merged with Voting Age Population demographics by race/ethnicity to create a standard dataset for analyzing voting patterns.
5. Overall, the accumulated evidence I considered leads me to conclude the following:
 - a. By using two ecological inference methods, Iterative EI and RxC, which are the standard methods of measuring RPV, and applying these to past electoral results paired with VAP demographic data, I have identified definitive evidence of Racially Polarized Voting in Wicomico County.
 - b. Black voters in Wicomico County voted cohesively for candidates disfavored by White voters in 32 out of 33 countywide contests analyzed.
 - c. White voters in Wicomico County are also politically cohesive and voted for candidates disfavored by Black voters in 32 out of 33 contests analyzed. In every countywide contest except for the 2022 At Large Board of Education election in which all candidates were white, the candidates favored by White voters are different than, and ran against, those favored by Black voters.
 - d. Election results show that White voters bloc voted in sufficient numbers to defeat the Black-preferred candidates³ in 19 out of 22 (or 86%) exogenous countywide general elections, in 3 out of 3 exogenous countywide Democratic primary elections (or 100%), and in 6.5 out of 7⁴ (or 93%) of countywide endogenous elections in which RPV patterns were found.⁵ Overall, White voters voted as a bloc to deny 28.5 out of 33 (or 86%) Black-preferred candidates over the last decade. Not accounting for the single election in which White and Black voters did not have divergent candidate preferences,

² For example, the 2022 general elections results by precincts can be found here: https://elections.maryland.gov/elections/2022/election_data/index.html

³ Black-preferred candidates are candidate who received the majority of Black votes in two-candidate contests and a majority or plurality of votes in contests featuring two or more candidates.

⁴ In the 2018 At Large County Council contest for two seats, a Black candidate preferred by Black voters lost, but a White candidate preferred by Black voters won.

⁵ Statewide and County vote totals for each election and candidate can be viewed on Maryland’s State Board of Elections website: <https://www.elections.maryland.gov/elections/2022/index.html>

White voters successfully denied 28.5 out of 32 (or 89%) Black-preferred candidates to win the plurality or majority of Wicomico County votes.⁶

- e. White voters also voted as a bloc to deny all Black candidates (or 100%) preferred by Black voters from winning the plurality or majority of Wicomico County votes in any of the countywide elections examined between the years 2012 to 2022.
- f. The accumulated evidence clearly illustrates that White voters in Wicomico County can usually deprive Black voters of the opportunity to elect their candidates of choice in countywide races.

II. Background and Qualifications

- 6. I am Associate Professor and Provost Teaching Fellow in the department of Political Science and International Relations at the University of Delaware. I joined the faculty in 2016 and received tenure in 2021. I am also an affiliated faculty member at the University of Delaware's Data Science Institute, Master of Science in Data Science, Center for Political Communication, and Center for the Study of Diversity. My academic specializations include racial and ethnic politics, political behavior, political psychology, and political methodology. I teach courses on the Voting Rights Act, race and ethnicity in politics, and American political behavior.
- 7. My research and teaching focus on American political behavior, political methodology, political psychology, political representation, voting rights, and redistricting. My research has appeared in numerous leading peer-reviewed, social science journals, including *Sociological Methods and Research*, *Political Behavior*, *Public Opinion Quarterly*, *Political Psychology*, *Advances in Political Psychology*, *British Journal of Political Science*, *Electoral Studies*, *Perspectives on Politics*, *Urban Affairs Review*, *State Politics and Policy Quarterly*, and *Journal of Public Policy*.
- 8. I received my Ph.D. in Political Science, specializing in American politics, racial and ethnic politics, and political methodology, from the University of Washington in Seattle, Washington in 2016. Prior to that, I received my master's degree in political science at the University of Washington and received a political methodology field certificate from the Center for Statistics & the Social Sciences in 2013. I received my Bachelor of Arts in Political Science in 2008 at the University of Washington, with minors in Human Rights and Law, Societies, and Justice.
- 9. Throughout my academic career, I have taught courses on a range of topics related to voting behavior and redistricting. This includes instruction on demographic and electoral data collection and analysis utilizing election returns, voter history files, Decennial U.S. Census data, and American Community Survey data. I have also instructed on the evaluation of

⁶ Since Wicomico County Council and Board of Education contests were At Large elections where the top two candidates with the most votes won, an alternative way to summarize the results is to count the number of seats Black-preferred candidates won or lost across all election contests. This method yields 22 exogenous seats, 3 primary seats, and 11 endogenous seats in which RPV was present. Out of these 36 total seats where Black and White voters had divergent voting preferences, only 4 (or 11%) of Black-preferred candidates won in Wicomico County. None of the 4 candidates who won were Black candidates.

electoral maps for compliance with the Voting Rights Act of 1965 (“VRA”) and traditional redistricting principles.

10. I have served as an expert witness in various redistricting and voting rights cases, where I utilized demographic data derived from voter files, the U.S. Decennial Census or American Community Survey to conduct racially polarized voting analyses, to develop illustrative and remedial plans, and to evaluate plans for compliance with the VRA and traditional and state-specific redistricting principles. The cases I have worked on include *Dickinson Bay Area Branch NAACP v. Galveston County, Texas*, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified]; *Baltimore County Branch of the NAACP v. Baltimore County, Maryland*, No. 1:21-cv-03232-LKG (D. Md. 2022); *Common Cause Florida v. Lee*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022); *Common Cause Florida v. Byrd*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed]; *Reyes v. Chilton*, No. 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed]; *Finn et al. v. Cobb County Board of Elections and Registration*, No. 1:22-cv-02300-ELR (N.D. Ga. 2022); *Caroline County Branch of the NAACP v. Town of Federalsburg*, Civ. Action No. 23-SAG-00484 (D. Md. 2023); *Coca v. City of Dodge City, et al.*, Case No. 6:22-cv-01274 (D. Kan. 2022) [Deposed & Testified]; *Soto Palmer v. Hobbs*, No. 3:22-cv-05035-RSL (W.D. Wash. 2021) [Testified]; *Wicomico County Branch of the NAACP et al v. Wicomico County, MD*, Civ. Action No. 23-MJM-03325 (D. Md. 2023); and *Stone v. Allen*, No. 2-21-cv-1531 (N.D. Ala. 2021) [Deposed]; *New York Communities for Change et al. v. County of Nassau, NY et al.*, No. 602316/2024 (N.Y.S.)
11. As an expert consultant, I advised the State of Maryland on its 2021 Congressional and Legislative redistricting plans as it pertains to compliance with the Voting Rights Act. I have also examined and redrawn the 2022 school board district boundaries of the Roswell Independent School District in the state of New Mexico.
12. I have published peer-reviewed academic papers on ecological inference methods as it pertains to racially polarized voting analysis. In 2022, I published a paper in the top-ranked *Sociological Methods and Research* journal titled “Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI & EI-RxC Methods.” In 2016 I published a paper titled “eiCompare: Comparing Ecological Inference Estimates across EI and EI:RxC” in the *R Journal*. Both papers utilize a software package I co-developed called “eiCompare,” which is a reproducible code that quantifies, compares, and represents data on racial voting patterns. The package enables social scientists to use aggregate-level election and demographic data retrieved from the U.S. Census, American Community Survey, and voter files to predict racial and ethnic group voting behavior. eiCompare has been cited in numerous academic papers and in court filings. More information about my qualifications and expert witness and consulting background, including all my publications over the past ten years, can be found on my Curriculum Vitae, appended to this declaration as **Attachment A**.
13. In the *Galveston County* case, the court recognized me as an expert on racially polarized voting analysis and credited my analyses, opinions, and testimony, granting them “substantial weight.” See *Petteway v. Galveston Cnty.*, No. 3:22-CV-57, 2023 WL 6786025, at *9 (S.D. Tex. Oct. 13, 2023) (“The court recognized Dr. Oskooii as an expert on racially polarized voting analysis. The defendants’ expert on the second and third Gingles preconditions, Dr. John Alford, testified that he greatly respects Dr. Oskooii as a methodologist. Dr. Alford agreed

with the numerical accuracy of . . . Dr. Oskooii’s ecological-inference results and adopted their results for his analysis.”)

14. I am being compensated at a rate of \$350 per hour for my work in this matter. My compensation is not in any way contingent on the content of my opinions or the outcome of this matter.

III. Racially Polarized Voting (“RPV”)

15. The analysis of RPV in this report is relevant to Plaintiffs’ allegations that Wicomico County’s election systems for County Council and School Board violate Section 2 of the Voting Rights Act of 1965. As set forth in my 2022 paper “Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI and EI-RxC Methods,” the court established a three-pronged test:

In *Thornburg v. Gingles*, 478 U.S. 30 [(1986)], the court established a legal framework to guide VRA challenges to legislative districts or at-large voting systems that have been accused of diluting minority voting opportunities. According to *Gingles*, there are three prongs that plaintiffs must establish through an analysis of voting data to make a successful claim: (1) the minority group is both geographically compact and large enough to create a single-member district, (2) the minority group tends to vote together and is politically cohesive, and (3) the nonminority (majority group) tends to vote in the opposite direction, such that it can usually block the minority groups’ preferred candidate (Ross 1993).

16. In general, RPV occurs when a minority racial group or groups favor candidates (termed “candidates of choice”) that are disfavored by the majority racial group. If a majority of voters from both the minority and majority racial groups vote for the same candidate in a contest, RPV is usually not present in that contest.⁷ To determine the presence or absence of RPV, analysts look for patterns across multiple elections rather than drawing inferences based on only one election.
17. In situations where RPV is present, majority voters, for example, White voters, may be able to consistently or usually prevent minority voters, for instance, Black voters, from electing their candidates of choice by voting as a bloc for candidates running in opposition to minority voters’ preferred candidates.

⁷ In multi-candidate (typically At Large elections) contests of three or more candidates, analysts consider the plurality of votes received by different racial or ethnic groups.

IV. Data and Methodology

A. Election Data

18. For each voting precinct in Wicomico County, I obtained election data from the Maryland State Board of Elections Data Files (<https://elections.maryland.gov>).⁸ I collected election returns for 33 contested countywide, state, or federal general election contests from year 2012 to 2022.⁹ I selected these contests because they cover all the voting precincts inside of Wicomico County, enabling me to draw inferences about voting behavior across the entire region.
19. The composite of elections features 13 Black candidates.¹⁰ Contested elections are defined as elections in which at least two candidates run against each other. An election must be contested to use it to examine RPV patterns.
20. **Tables 1-3** provide the slate of elections that I analyzed for this Report. For each election in which not a single candidate outside of the top two received more than ten percent of the countywide vote total, I selected the two top-vote-receiving candidates for RPV analyses. I use an asterisk symbol (*) to identify the Black candidates across the slate of elections.
21. In addition to providing contest and candidate information, **Tables 1-3** also report which candidate won the most votes in each contest statewide (where applicable) and in Wicomico County in specific.

⁸ For elections prior to 2020, the Maryland State Board of Elections is unable to assign early, provisional, and absentee votes to individual voting precincts. (For more details, see: https://elections.maryland.gov/elections/using_election_data_instructions.html).

⁹ At the time of my analysis, official 2024 Democratic Primary election results by voting precincts were not publicly available on the Maryland Board of Elections website. Should such results become available, I reserve the right to examine them.

¹⁰ Counsel for the plaintiffs assisted in identifying Black candidates if such information was not known by me.

Table 1: List of Federal or Statewide (Exogenous) General Elections Analyzed

Year	Contest	Top 2 Candidates		Election Winner	Wicomico County Winner
2022 General	U.S. Senate	Van Hollen	Chaffee	Van Hollen	<i>Chaffee</i>
	U.S. House	Mizeur	Harris	Harris	<i>Harris</i>
	Governor	Moore*	Cox	Moore	<i>Cox</i>
	Attorney General	Brown*	Peroutka	Brown	<i>Peroutka</i>
	Comptroller	Lierman	Glassman	Lierman	<i>Glassman</i>
2020 General	President	Biden	Trump	Biden	<i>Trump</i>
	U.S. House	Mason	Harris	Harris	<i>Harris</i>
2018 General	U.S. Senate	Cardin	Campbell*	Cardin	<i>Cardin</i>
	U.S. House	Colvin	Harris	Harris	<i>Harris</i>
	Governor	Jealous*	Hogan	Jealous	<i>Hogan</i>
	Attorney General	Frosh	Wolf	Frosh	<i>Wolf</i>
2016 General	Comptroller	Franchot	Phukan	Franchot	<i>Franchot</i>
	President	Clinton	Trump	Clinton	<i>Trump</i>
	U.S. Senate	Van Hollen	Szeliga	Van Hollen	<i>Szeliga</i>
	U.S. House	Wener	Harris	Harris	<i>Harris</i>
2014 General	Governor	Brown*	Hogan	Brown	<i>Hogan</i>
	Attorney General	Frosh	Pritzker	Frosh	<i>Pritzker</i>
	Comptroller	Franchot	Campbell*	Franchot	<i>Campbell</i>
	U.S. House	Tilghman	Harris	Harris	<i>Harris</i>
2012 General	President	Obama*	Romney	Obama	<i>Romney</i>
	U.S. Senate [^]	Cardin	Bongino	Cardin	<i>Cardin</i>
	U.S. House	Rosen	Harris	Harris	<i>Harris</i>

Note: * Denotes Black/African-American Candidate

[^] 2012 U.S. Senate RPV analysis includes candidate S. Rob Sobhani, who received 20.6% of all votes cast in Wicomico County.

Table 2: List of Countywide (Endogenous) General Elections Analyzed

Year	Contest	Candidates				Election Winner(s)
2022 General	County Executive	Davis*	Giordano	-	-	Giordano
	County Council At Large	Winn	Cannon	Outten	Gillis	Winn & Cannon
	Board of Ed. At Large	Hazel	Ennis	Lombardo	Demko	Hazel & Ennis
2018 General	County Executive	Culver	Heath	Hamilton	-	Culver
	County Council At Large	Cannon	Brewington	McCain	Gould*	Cannon & McCain
	Board of Ed. At Large	Murray	Fitzgerald	Watson*	Cooper*	Murray & Fitzgerald
2014 General	County Executive	Culver	Pollitt	-	-	Culver
	County Council	Holloway	Cannon	Mitchell	-	Holloway & Cannon

Note: * Denotes Black/African-American Candidate

Table 3: List of Democratic Primary Elections Analyzed

Year	Contest	Candidates			Election Winner	Wicomico County Winner
2022 Primary	Governor	Moore*	Franchot	Perez	Moore	Franchot
	Attorney General	Brown*	O'Malley	-	Brown	O'Malley
2016 Primary	U.S. Senate	Edwards*	Van Hollen	-	Van Hollen	Van Hollen

Note: * Denotes Black/African-American Candidate

22. The composite of 30 contested general elections and 3 Democratic primary elections from 2012 – 2022 I rely on is sufficient for me to draw reliable conclusions about racially polarized voting in Wicomico County. I did not examine elections from before 2012 for the following reasons: (i) the more recent elections are the most probative of current and future voting patterns, (ii) a composite of 33 elections is more than an adequate data set particularly when the RPV results are highly consistent over a span of 10 years.

B. Demographic Data

23. For demographic data, I obtained Voting Age Population (VAP) demographics by race/ethnicity from the 2010 and 2020 U.S. Census Redistricting Dataset (P.L. 94-171).¹¹

¹¹ This is available at: <https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html>. I also relied on the open source “censable” R package (<https://christophertkenny.com/censable/>), which obtains formatted data from the U.S. Census.

24. Next, I joined the election data with the demographic data by voting precincts and created the following variables: percent votes received by each candidate, total votes received between the candidates examined, and the percent White, Black, and other VAP.¹²

C. RPV Methodology

25. The voting patterns of different racial groups typically must be inferred using statistical methods. This is because no public records show which candidate each individual voter voted for because elections are conducted by secret ballot.

26. Several methods are available to assess the *Gingles* preconditions of White bloc voting and Black voter cohesion.¹³ Of these, social scientists and voting rights experts most often rely on Ecological Inference (EI)¹⁴, which has been deemed the “...benchmark method courts rely upon to evaluate RPV patterns in voting rights lawsuits.”¹⁵

27. Two variations of EI have emerged to estimate individual-level voting behavior using aggregate-level data.¹⁶ The first is often referred to as King’s Iterative EI,¹⁷ which estimates parameters using the method of maximum likelihood. The second—and more computationally intensive method—is called EI Rows by Columns (RxC),¹⁸ which uses a hierarchical Bayesian model. King’s EI is referred to as the iterative approach because it runs a 2-by-2 analysis of each candidate and each racial group in iterations, whereas the RxC method estimates multiple

¹² Election data from 2014-2022 were merged with the 2020 Voting Age Population demographics by race/ethnicity, whereas 2012 election data was merged with the 2010 Voting Age Population demographics by race/ethnicity.

¹³ Clarke, B. and Reagan, R.T., 2002. *Redistricting Litigation: An Overview of Legal, Statistical, and Case-management Issues*. Federal Judicial Center.

¹⁴ “Ecological inference is the process of using aggregate (i.e., “ecological”) data to infer discrete individual-level relationships of interest when individual-level data are not available. Ecological inferences are required in political science research when individual-level surveys are unavailable (e.g., local or comparative electoral politics), unreliable (racial politics), insufficient (political geography), or infeasible (political history). They are also required in public policy (e.g., for applying the Voting Rights Act) and other academic disciplines ranging from epidemiology and marketing to sociology and quantitative history.” (page 2) King, G. and Roberts, M., 2012. EI: a (n R) program for ecological inference. *Harvard University*.

¹⁵ Barreto, M., Collingwood, L., Garcia-Rios, S. and Oskooii, K.A., 2022. Estimating candidate support in Voting Rights Act cases: Comparing iterative EI and EI-R \times C methods. *Sociological Methods & Research*, 51(1), pp.271-304. [quote from page 6]

¹⁶ “...Where survey research or other means of individual-level data collection are infeasible, ecological inference is best and often the only hope of making progress. Ecological inference is the process of extracting clues about individual behavior from information reported at the group or aggregate level.” [Page 1] King, G., Tanner, M.A. and Rosen, O. eds., 2004. *Ecological inference: New methodological strategies*. Cambridge University Press; see also, Rosen, O., Jiang, W., King, G. and Tanner, M.A., 2001. Bayesian and frequentist inference for ecological inference: The R \times C case. *Statistica Neerlandica*, 55(2), pp.134-156.

¹⁷ King, G., 2013. A solution to the ecological inference problem. In *A Solution to the Ecological Inference Problem*. Princeton University Press.

¹⁸ Rosen, O., Jiang, W., King, G. and Tanner, M.A., 2001. Bayesian and frequentist inference for ecological inference: The R \times C case. *Statistica Neerlandica*, 55(2), pp.134-156.

rows and multiple columns simultaneously in one model. Both versions of EI operate similarly in that the following voting precinct-level data is required to estimate vote choice by racial or ethnic groups: (1) the percentage of each racial and ethnic group under consideration; (2) the percentage of votes received by each candidate; and (3) the total votes cast between the candidates at each precinct. A comprehensive assessment of the two methods using precinct-level data ranging from two candidates and two racial groups to multiple candidates and up to four racial groups suggests that they produce substantively similar conclusions regarding RPV patterns.¹⁹

28. The statistical methods I rely on to estimate voting patterns by race/ethnicity are agnostic as to why voters support or oppose different candidates; the results simply show which groups of voters prefer which candidates.
29. To estimate vote choice with each EI method, I use a peer-reviewed, open-source software package titled “eiCompare,” which includes the necessary functions to estimate vote choice by race with both iterative EI and RxC.²⁰ This package, which I am an author of, is publicly available on GitHub²¹ and can be uploaded into the statistical computing and graphics software called “R.”²²

V. Racially Polarized Voting Results

30. This section reports all the ecological inference analysis results to determine whether there is racially polarized voting in Wicomico County such that Black voters are cohesive (in that a majority or plurality of Black voters vote for the same candidates) and White voters vote as a bloc in opposition to Black candidates of choice.

A. Racially Polarized Voting Patterns in Exogenous General Elections

31. The results of the RPV analysis of White vs. Black vote choice for the 22 exogenous general elections under the King’s EI iterative method are displayed in **Figure 1**. The results of my analysis using the same elections and racial groups under the EI RxC method are shown in **Figure 2**. The left side of each chart lists the contest names, election years, and associated candidate names. The color-coded panels present vote estimates by racial groups (left panel is the White vote, right panel is the Black vote). The bars in the charts represent estimated vote

¹⁹ Barreto, M., Collingwood, L., Garcia-Rios, S. and Oskooii, K.A., 2022. Estimating candidate support in Voting Rights Act Cases: Comparing iterative EI and EI-RxC Methods. *Sociological Methods & Research*, 51(1), pp.271-304.

²⁰ Collingwood, L., Oskooii, K., Garcia-Rios, S. and Barreto, M., 2016, *eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC*. R J., 8(2), at 92.

²¹ eiCompare: <https://github.com/RPVote/eiCompare>

²² The R Foundation, *What is R?*, <https://www.r-project.org/about.html>

percentages, with lines/bands indicating 95% confidence/credible intervals (CIs) around the point estimates.²³ Vote estimate percentages are also provided at tail ends of the CI bands.

²³ Confidence intervals provide information about the probability that the interval contains or covers the unknown true parameter (Frequentists approach). Credible intervals capture uncertainty in the location of the parameter values (Bayesian approach). Scientific studies often report 90% or 95% CIs, with some studies, depending on context, reporting 67% CIs or lower. CIs are sensitive to the sample size and the standard deviation of the study groups. If the sample size is small and dispersion is high, the CIs become wider. Each electoral jurisdiction is unique with different racial group concentrations and sizes across different Voting Precincts/VTDs. Therefore, analysts should not apply overly strict or rigid guidelines to all jurisdictions.

Figure 1: King’s Iterative EI Estimates for Exogenous Wicomico County General Elections 2012-2022, White vs. Black Vote Choice

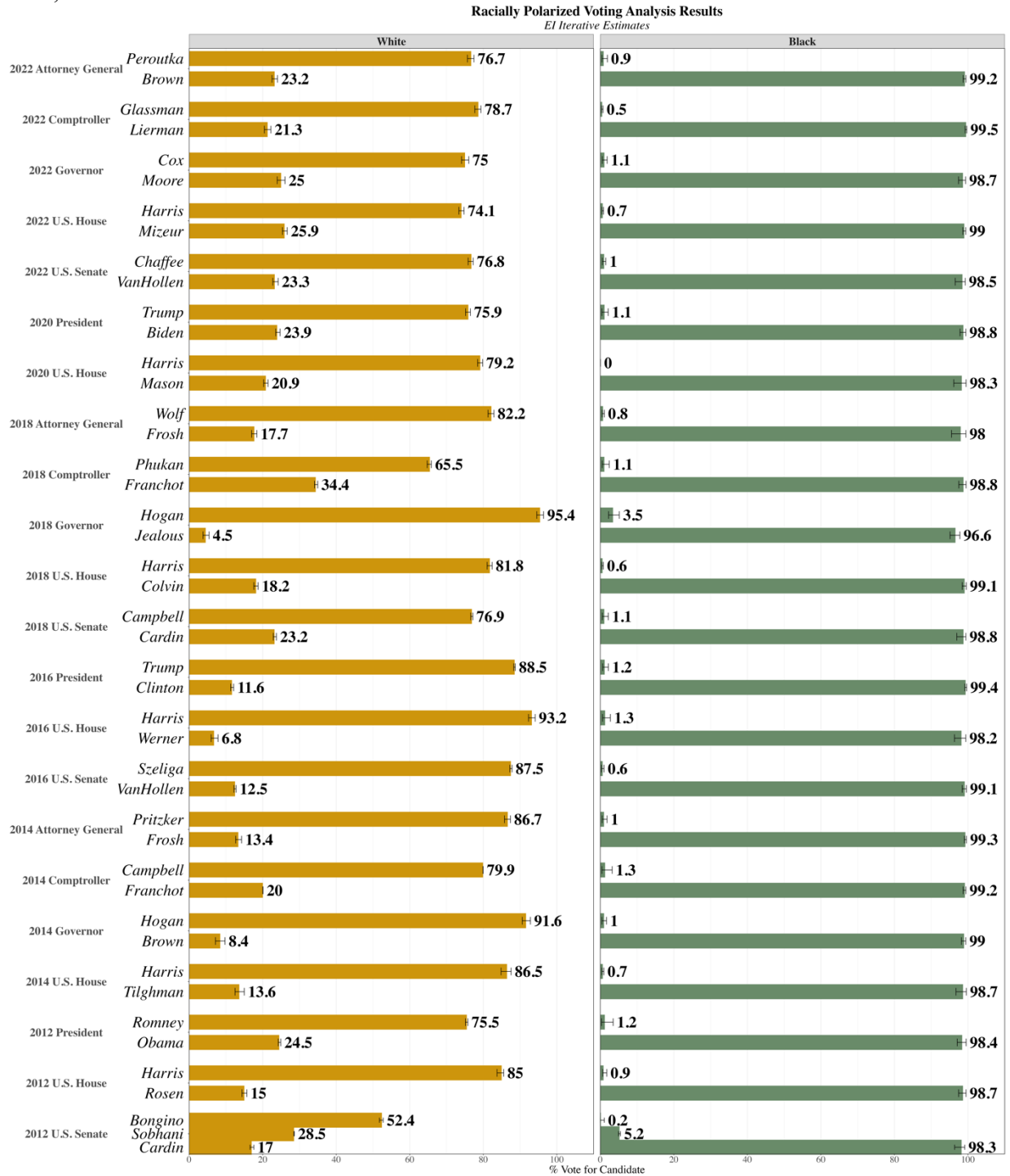
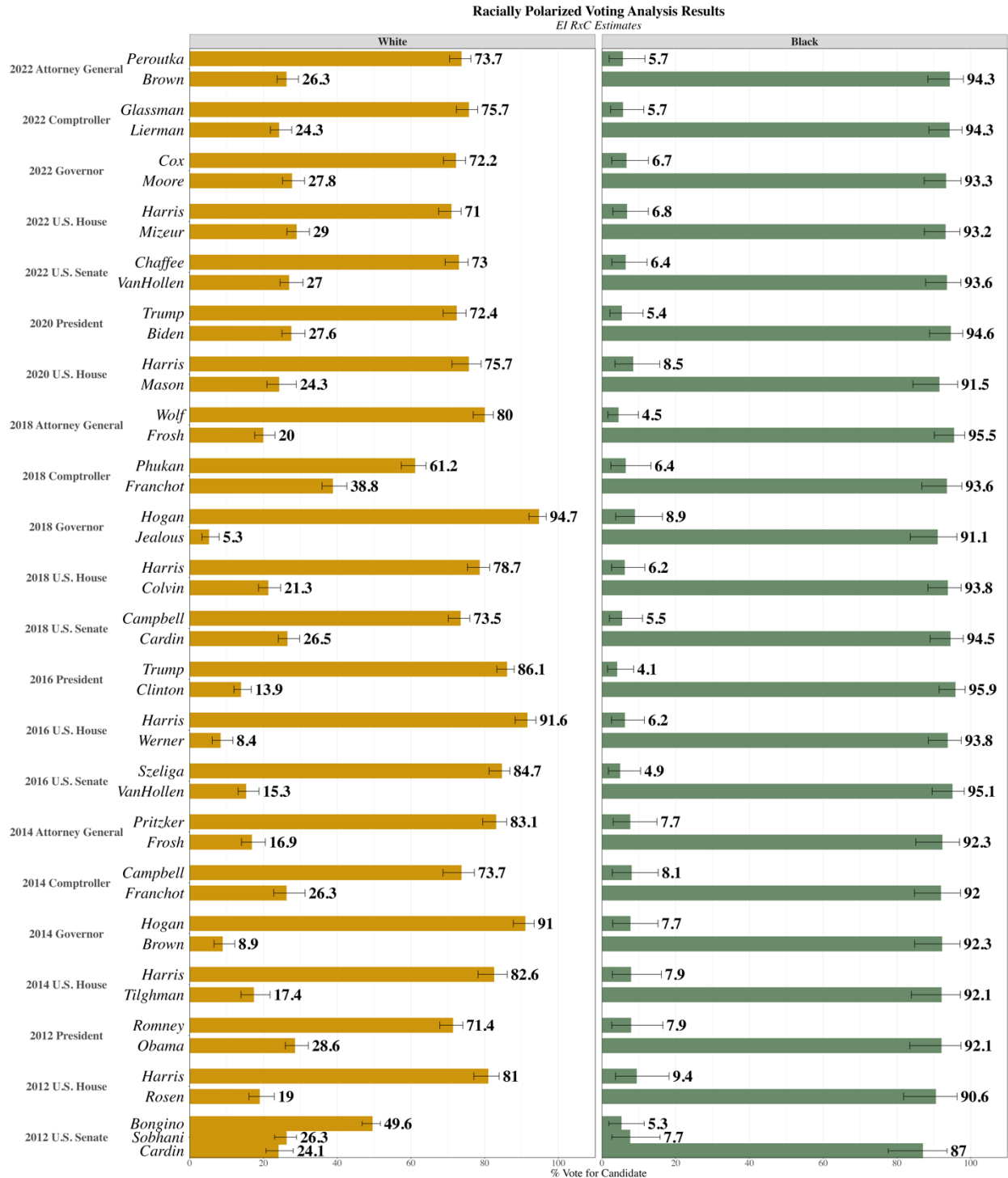


Figure 2: EI RxC Estimates for Exogenous Wicomico County General Elections 2012-2022, White vs. Black Vote Choice



32. The results show that both methods produce very similar vote choice estimates, with no substantive differences that would lead to divergent conclusions about RPV patterns in Wicomico County. Therefore, I will reference only the RxC estimates when describing White and Black vote choices. All EI iterative estimates are included in the charts.
33. Beginning with the first election listed in **Figure 2**, I find clear evidence of RPV patterns. In the 2022 election for the Maryland Attorney General, White candidate Michael Peroutka received an estimated 73.7% of Wicomico County's White vote, but only 5.7% of the Black vote. In contrast, Black candidate Anthony Brown received an estimated 26.3% of the White and 94.3% of the Black vote. Notably, Mr. Brown comfortably won the election statewide by receiving 64.95% of the votes, while losing in Wicomico County.
34. The general election results from the 2022 gubernatorial election show a similar pattern of Black cohesion and Whites voting cohesively against the Black-preferred candidate. In the 2022 contest for Governor, White candidate Daniel Cox received an estimated 72.2% of the White vote but only 6.7% of the Black vote. His opponent, Black candidate Wes Moore won the election statewide but lost the overwhelming majority of White vote in Wicomico County, receiving only 27.8% of the White vote. In contrast, Mr. Moore received an estimated 93.3% of the Black vote.
35. This clear pattern of RPV in Wicomico County exists in every contest throughout the decade, dating back to the 2012 U.S. Presidential election. For instance, in the 2018 gubernatorial election, Black candidate Ben Jealous received an estimated 91.1% of the Black vote but only 5.3% of the White vote. In contrast, an estimated 94.7% of White voters supported White candidate Larry Hogan, who won both the statewide vote and in Wicomico County. Similar RPV patterns are evident in the 2014 gubernatorial election, where Black candidate Anthony Brown won 92.3% of the Black vote but lost in Wicomico County to Larry Hogan, who received an estimated 91% of the White vote.
36. In the 2012 U.S. Presidential election, incumbent President Barack Obama won 92.1% of the Black vote but only 28.6% of the White vote. His White challenger, Mitt Romney, won 71.4% of the White vote but just 7.9% of the Black vote. Although Mr. Obama won the statewide vote in Maryland, he received fewer votes than Mr. Romney in Wicomico County.
37. In summary, both the iterative EI and RxC estimates show that Black voters in Wicomico County vote cohesively in all the 22 elections to support their candidates of choice, while White voters in the county vote as a bloc against the Black-preferred candidates. Over the past decade, there has not been a single instance where a Black candidate preferred by Black voters, running for a statewide or federal seat, received more than 30% of the White vote in Wicomico County, even when those candidates won the statewide vote by comfortable margins.²⁴

²⁴ In the 2018 US Senate contest, Black candidate, Mr. Campbell, received 73.5% of the White vote, but was highly disfavored by Black voters, receiving only 5.5% of their vote (see Figure 2). Mr. Campbell also ran in 2014 for Comptroller and was not the Black-preferred candidate given that he only received 8.1% of the Black vote in Wicomico County. Mr. Campbell lost the statewide and Wicomico County vote in 2018. He also lost the statewide vote in 2014 but won the Wicomico County vote against Mr. Franchot.

38. **Table 4** provides a summary of the RPV findings to assess whether Wicomico County White voters can usually defeat Black-preferred candidates in the 22 exogenous elections.

Table 4: Summary of Federal or Statewide (Exogenous) General Election RPV and White-Bloc Voting Outcomes in Wicomico County

Year	Contest	Top 2 Candidates		Black-Preferred Candidate	RPV	Black-Preferred Candidate Won/Lost
2022 General	U.S. Senate	Van Hollen	Chaffee	Van Hollen	YES	LOST
	U.S. House	Mizeur	Harris	Mizeur	YES	LOST
	Governor	Moore*	Cox	Moore	YES	LOST
	Attorney General	Brown*	Peroutka	Brown	YES	LOST
	Comptroller	Lierman	Glassman	Lierman	YES	LOST
2020 General	President	Biden	Trump	Biden	YES	LOST
	U.S. House	Mason	Harris	Harris	YES	LOST
2018 General	U.S. Senate	Cardin	Campbell*	Cardin	YES	WON
	U.S. House	Colvin	Harris	Colvin	YES	LOST
	Governor	Jealous*	Hogan	Jealous	YES	LOST
	Attorney General	Frosh	Wolf	Frosh	YES	LOST
	Comptroller	Franchot	Phukan	Franchot	YES	WON
2016 General	President	Clinton	Trump	Clinton	YES	LOST
	U.S. Senate	Van Hollen	Szeliga	Van Hollen	YES	LOST
	U.S. House	Wener	Harris	Wener	YES	LOST
2014 General	Governor	Brown*	Hogan	Brown	YES	LOST
	Attorney General	Frosh	Pritzker	Frosh	YES	LOST
	Comptroller	Franchot	Campbell*	Franchot	YES	LOST
	U.S. House	Tilghman	Harris	Tilghman	YES	LOST
2012 General	President	Obama*	Romney	Obama	YES	LOST
	U.S. Senate [^]	Cardin	Bongino	Cardin	YES	WON
	U.S. House	Rosen	Harris	Rosen	YES	LOST

Note: * Denotes Black/African-American Candidate

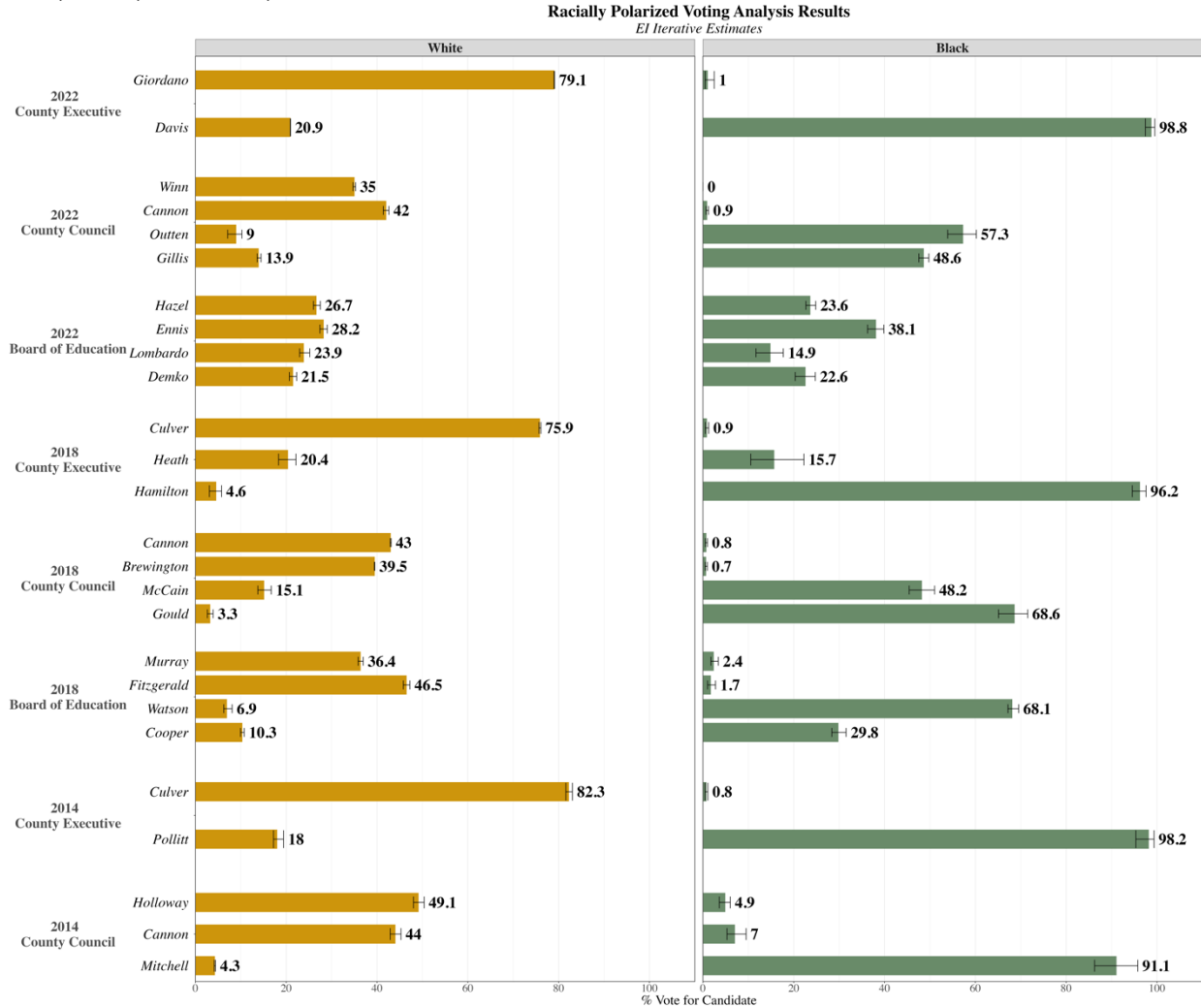
[^] 2012 U.S. Senate RPV analysis includes candidate S. Rob Sobhani, who received 20.6% of all votes cast in Wicomico County.

39. The results show that RPV exists in 22 out of 22 general elections contests from years 2012 to 2022. In all but three cases, the Black-preferred candidate was defeated by the White-preferred candidate. Stated differently, Black-preferred candidates lost 86.4% of the contests among Wicomico County voters. These exogenous election findings lead me to conclude that White voters in Wicomico County vote as a bloc to usually defeat Black-preferred candidates.

B. Racially Polarized Voting Patterns in Endogenous General Elections

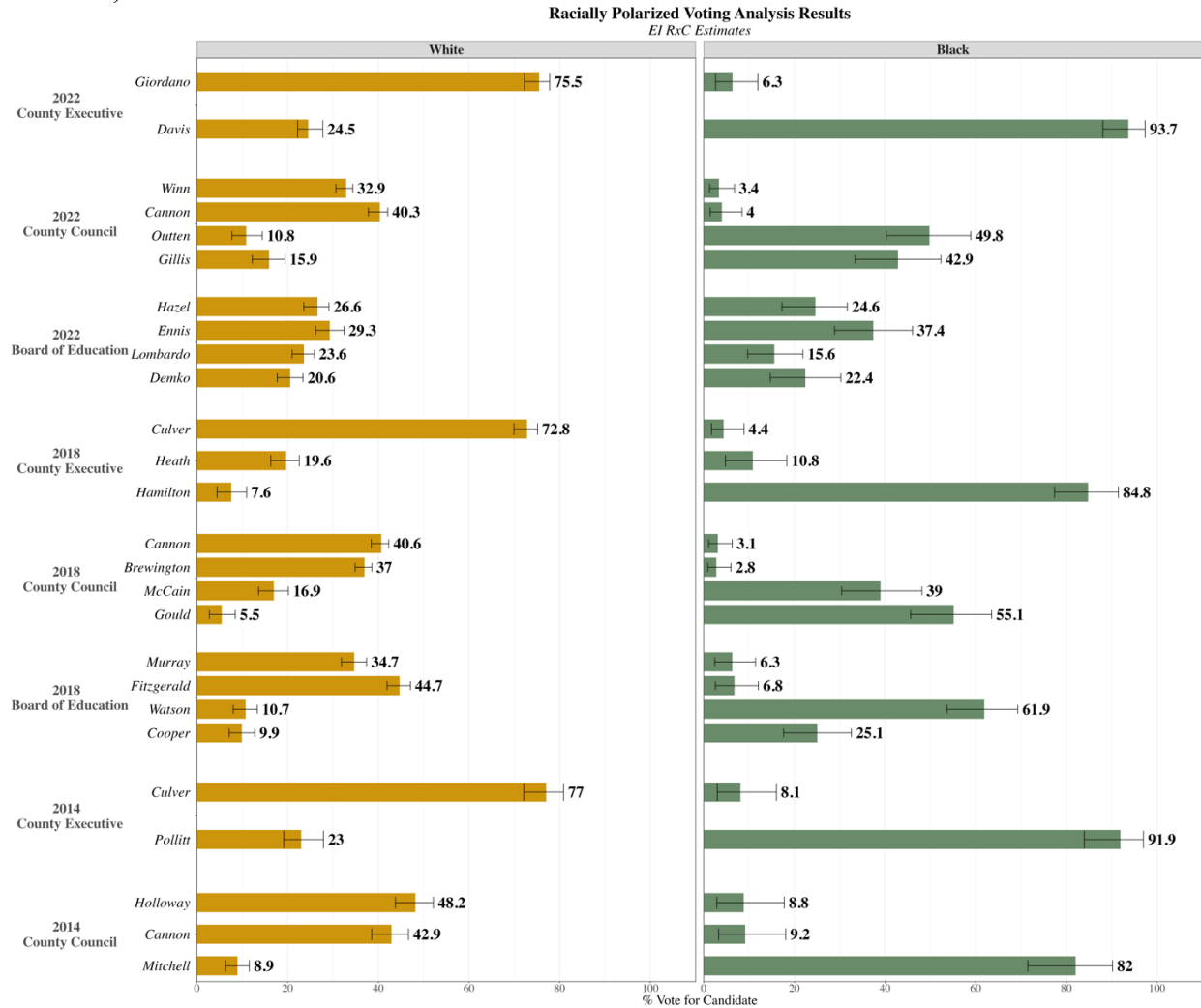
40. In **Figures 3** and **4** I report the ecological inference results for the eight endogenous general elections held in 2014, 2018, and 2022.²⁵ Both County Council and Board of Education contests are at-large elections and elect two candidates to office.

Figure 3: King’s Iterative EI Estimates for Endogenous Wicomico County General Elections 2014, 2018, and 2022, White vs. Black Vote Choice



²⁵ Prior to 2018, Wicomico County Board of Education members was appointed by the state Governor. There were no County Executive or County Council elections in 2012, 2016, or 2020.

Figure 4: EI RxC Estimates for Endogenous Wicomico County General Elections 2014, 2018, and 2022, White vs. Black Vote Choice



41. The results of both the EI iterative and EI RxC models show that voting is racially polarized in 7 out of 8 contests.
42. In the 2022 County Executive contest, an estimated 93.7% (according to the RxC Model) of Black voters supported the Black candidate, Ernest Davis, who received only 24.5% of the White vote and lost the election. In contrast, his opponent, Julie Giordano, received 75.5% of the White vote in Wicomico County but only 6.3% of the Black vote.
43. In the 2018 County Executive contest, which featured three White candidates, an estimated 84.8% of Black voters supported John William Hamilton. Meanwhile, 72.8% of White voters supported his opponent, Bob Culver, who won the election. The 2014 County Executive contest also shows racial polarization in voting, with Richard Pollitt receiving 91.9% of the

Black vote but only 23% of the White vote. His opponent, Bob Culver, who won the election, received 77% of the White vote.

44. The County Council contests from 2014, 2018, and 2022 show racially polarized voting. In 2022, a plurality of White voters supported candidates Winn and Cannon, both of whom won the election. In contrast, a plurality of Black voters supported candidates Outten and Gillis, who lost the election. In 2018, Cannon and Brewington received the plurality of the White vote, with 40.6% and 37%, respectively. Meanwhile, McCain and Gould, a Black candidate, received 39% and 55.1% of the Black vote. White candidates Cannon and McCain won the election; the only Black candidate on the ballot, Jamaad Gould, came in fourth, receiving 20.6% of all votes cast, and lost the election. In 2014, the Black-preferred candidate, Laura Mitchell, who received 82% of the Black vote, lost to White-preferred candidates John Cannon and Matt Holloway, who received 42.9% and 48.2% of the White vote.
45. In one out of the two Board of Education contests, I find racially polarized voting patterns. In 2022, I did not find racially polarized voting. White voters distributed their votes somewhat evenly amongst the four candidates. About 37% of the Black voters backed Bonnie H. Ennis followed by Kristin Hazel, who received an estimated 24.6% of the Black vote. Ms. Ennis and Ms. Hazel, who won the election, also received more votes from White voters than their other two opponents.
46. While I did not detect racially polarized voting patterns in the 2022 Board of Education contest, the 2018 Board of Education election featuring two Black candidates, Talana Watson and Tyrone Cooper, was racially polarized. Talana Watson received an estimated 61.9% of the Black vote but only 10.7% of the white vote. Tyrone Cooper received 25.1% of the Black vote but only 9.9% of the white vote. Fitzgerald and Murray, who received 44.7% and 34.7% of the white vote, respectively, won the election, defeating the two Black candidates.
47. To summarize, **Table 5** shows that out of 7 endogenous contests in which RPV was found, only one Black-preferred candidate won out of 11 available seats. That is, Black-preferred candidates lost 91% of the available seats from 2014 to 2022. Furthermore, not a single Black candidate preferred by Black voters won a single seat during this timeframe.

Table 5: Summary of Wicomico County General (Endogenous) Election RPV and White-Block Voting Outcomes

Year	Contest	Candidates				Black-Preferred Candidate(s)	RPV	Black-Preferred Candidate(s) Won/Lost
2022 General	County Executive	Davis*	Giordano	-	-	Davis	YES	LOST (x1)
	County Council At Large	Winn	Cannon	Outten	Gillis	Outten & Gillis	YES	LOST (x2)
	Board of Ed. At Large	Hazel	Ennis	Lombardo	Demko	Hazel & Ennis	NO	WON (x2)
2018 General	County Executive	Culver	Heath	Hamilton	-	Hamilton	YES	LOST (x1)
	County Council At Large	Cannon	Brewington	McCain	Gould*	McCain & Gould	YES	WON (x1); LOST (x1)
	Board of Ed. At Large	Murray	Fitzgerald	Watson*	Cooper*	Watson & Cooper	YES	LOST (x2)
2014 General	County Executive	Culver	Pollitt	-	-	Pollitt	YES	LOST (x1)
	County Council	Holloway	Cannon	Mitchell	-	Mitchell	YES	LOST (x2)

Note: * Denotes Black/African-American Candidate

C. Racially Polarized Voting Patterns in Democratic Primary Elections

48. **Figures 5 and 6** report EI Iterative and EI RxC Democratic Primary RPV results featuring Black candidates. I find RPV patterns in all these contests, which show that White Bloc voting against Black-preferred candidates is also present among voters participating in the Democratic Party primary elections. Given that the EI Iterative and RxC results lead to the same substantive conclusions about RPV patterns, the text only focuses on the RxC estimates.
49. In the 2022 Democratic primary election for the Attorney General, an estimated 78.5% of Black voters chose the Black candidate, Anthony Brown. In contrast, only 30% of white voters voted for Mr. Brown. The preferred candidate of White voters was candidate Katie O'Malley, who received more votes than Mr. Brown in Wicomico County despite to losing the statewide vote to Mr. Brown.
50. In the multi-candidate Democratic primary contest for Governor, where each of the three candidates received more than twenty percent of the total statewide vote, 49.2% of Black voters preferred the Black candidate, Wes Moore, who received the plurality of the total statewide vote, but did not get the plurality of votes in Wicomico County. Instead, Peter Franchot, who received the plurality of votes in Wicomico County, was the preferred candidate of White voters, receiving 59.2% of their vote. Therefore, even in a multi-candidate primary election, White and Black voters showed divergent candidate preferences, and the candidate that Black voters preferred did not garner the plurality of votes in Wicomico County.
51. RPV is also present in the 2016 Democratic contest for U.S. Senate, where the Black Candidate, Donna Edwards, lost to white Democrat, Chris Van Hollen. In this election, Donna Edwards received an estimated 74.1% of the Black vote, whereas Chris Van Hollen received an estimated 75.2% of the white vote. Donna Edwards lost the Statewide and Wicomico County vote.

Figure 5: King's Iterative EI Estimates for Democratic Primary Wicomico County Elections 2016 and 2022, White vs. Black Vote Choice

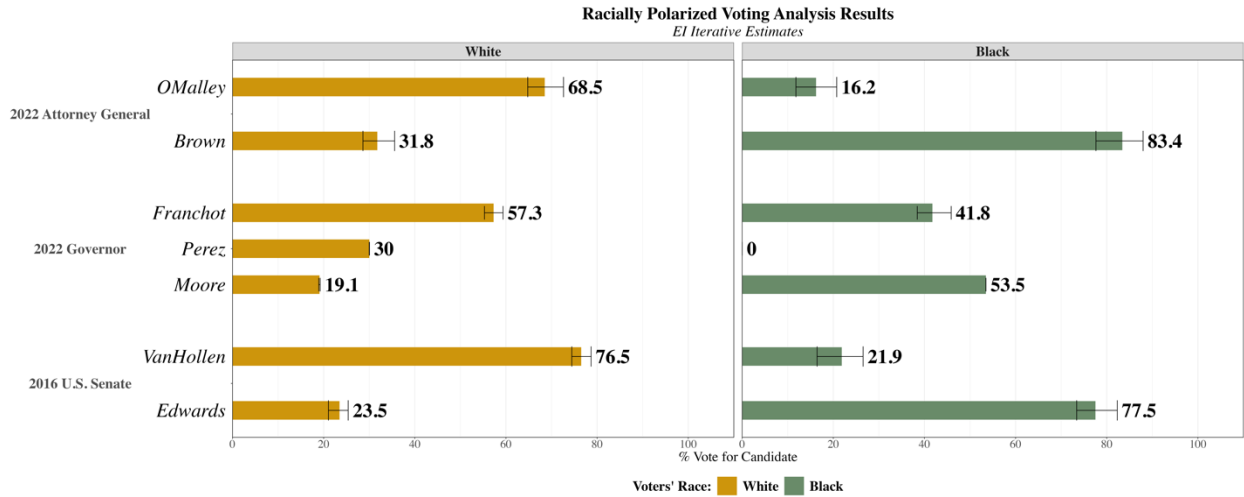
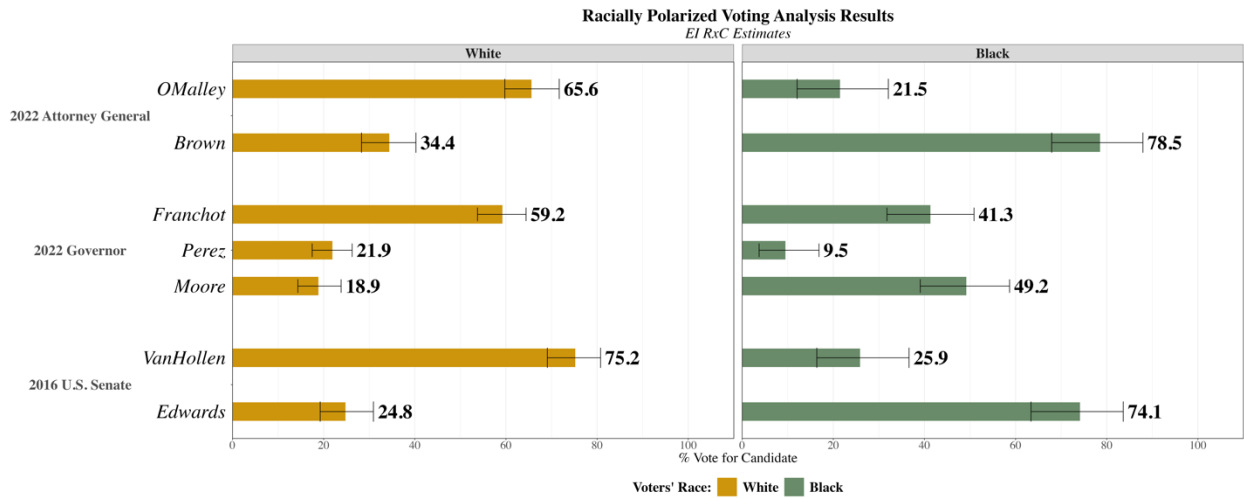


Figure 6: EI RxC Estimates for Democratic Primary Wicomico County Elections 2016 and 2022, White vs. Black Vote Choice



52. **Table 6** provides a summary of the RPV results and electoral outcomes. In all the three contests analyzed, the Black candidate was the preferred candidate of Black voters. All three Black candidates lost to White Democrats. Even in cases in which Moore and Brown won the statewide vote, they both lost in Wicomico County.

Table 6: Summary of Democratic Primary Election RPV and White-Bloc Voting Outcomes in Wicomico County

Year	Contest	Candidates			Black-Preferred Candidate(s)	RPV	Black-Preferred Candidate(s) Won/Lost
2022 Primary	Governor	Moore*	Franchot	Perez	Moore/Miller	YES	LOST
	Attorney General	Brown*	O'Malley	-	Brown	YES	LOST
2016 Primary	U.S. Senate	Edwards*	Van Hollen	-	Edwards	YES	LOST

Note: * Denotes Black/African-American Candidate

VI. Conclusions

53. I performed methodologically sound analyses of 33 contested elections from 2012 to 2022. I considered all the RPV results and electoral outcomes in forming my opinions. Having examined the data and results, I conclude that voting in Wicomico County is racially polarized. The evidence strongly shows that Black voters in Wicomico County vote cohesively for their candidates of choice, while White voters vote as a bloc to elect their own candidates of choice.
54. I found RPV in all 22 exogenous general elections examined. In 19 of these elections, the Black-preferred candidate lost in Wicomico County to the White-preferred candidate.
55. Not a single Black candidate preferred by Black voters running for a federal or statewide office in Maryland between 2012 and 2022 has been able to win in Wicomico County.
56. RPV is also present in 7 out of 8 contested endogenous, countywide elections. In these 7 countywide contests, only one Black-preferred candidate was able to win out of 11 available seats.
57. Not a single Black candidate preferred by Black voters has been able to win a seat in any County Executive, County Council At Large, or Board of Education At Large elections since 2014.
58. Finally, RPV is present in the Democratic Party primaries featuring Black candidates. In these contests, not a single Black candidate preferred by Black voters was able to beat a White-preferred candidate among Wicomico County voters participating in the Democratic Party primary, even when such candidates won the statewide race, as was the case for Governor Wes Moore and Attorney General Anthony Brown.
59. The findings and conclusions in this report are based on information that has been made available to me or known by me to date. I reserve the right to modify, update, or supplement my report and analysis as additional information becomes available.
60. To the best of my knowledge, this report includes all the opinions I have formed to date that, if called upon to testify, I would provide in this matter.

Pursuant to 28 U.S.C. § 1746, I, Kassra A.R. Oskooii, declare under penalty of perjury that the foregoing is true and correct.







Kassra A.R. Oskooii
Dated: 06/26/2024

Attachment A
Oskooii CV

Attachment A

Kassra A.R. Oskooii

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Academic Appointments	University of Delaware Political Science & International Relations Associate Professor 2021-Present Assistant Professor 2016-2021 Provost Teaching Fellow 2022-Present <i>Current Faculty Affiliations:</i> Data Science Institute (DSI) 2023-Present Master of Science in Data Science (MSDS) 2023-Present Center for Political Communication (CPC) 2016-Present Center for the Study of Diversity (CSD) 2016-Present <i>Former Faculty Affiliations:</i> Race, Justice, Policy Research Initiative (RJPRI) 2017-2023
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Education	University of Washington Ph.D., 2016 Department of Political Science General Fields: American Politics & Political Methodology Specialized Field: Minority and Race Politics University of Washington M.A., 2013 Department of Political Science Center for Statistics & the Social Sciences (CSSS) Political Methodology Field Certificate (2013) University of Washington B.A., 2008 Major: Political Science Minors: Human Rights and Law, Societies, & Justice
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Peer-Reviewed Journal Publications	“Anti-Muslim Policy Preferences and Boundaries of American Identity Across Partisanship.” <i>Journal of Public Policy</i>. w/ Lajevardi, N. (FirstView) “In the Shadow of September 11: The Roots and Ramifications of Anti-Muslim Attitudes in the United States.” <i>Advances in Political Psychology</i>. w/ Lajevardi, N., Saleem, M., and Docherty, M. (FirstView)
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- “Social Mobility Through Immigrant Resentment: Explaining Latinx Support for Restrictive Immigration Policies and Anti-Immigrant Candidates.” 2024. *Public Opinion Quarterly*, 88(1): 51-78. w/ Hickel, F., and Collingwood, L.
- “The Participatory Implications of Racialized Policy Feedback.” 2023. *Perspectives on Politics*, 21(3): 932-950. w/ Garcia-Rios, S., Lajevardi, N. and Walker, H.
- “Undermining Sanctuary? When Local and National Partisan Cues Diverge.” 2023. *Urban Affairs Review*, 59(1): 133-169. w/ Collingwood, L. & Martinez, G.
- “Fight Not Flight: The Effects of Explicit Racism on Minority Political Engagement.” 2022. *Electoral Studies*, 80: 102515. w/ Besco, R., Garcia-Rios, S., Lagodny, J., Lajevardi, N., Tolley, E.
- “Hate, Amplified? Social Media News Consumption and Anti-Muslim Policy Support.” 2022. *Journal of Public Policy*, 42: 656-683. w/ Lajevardi, N. and Walker, H. (FirstView)
- “Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI and EI-RxC Methods.” 2022. *Sociological Methods and Research*, 51(1): 271-304. w/ Barreto, M., Collingwood & Garcia-Rios, S.
- “Beyond Generalized Ethnocentrism: Islam-Specific Beliefs and Prejudice toward Muslim Americans.” 2021. *Politics, Groups, and Identities*, 9(3): 538-565. w/ Dana, K. & Barreto, M.
- “Opinion Shift and Stability: The Information Environment and Long-Lasting Opposition to Trump’s Muslim Ban.” 2021. *Political Behavior*, 43: 301–337. w/Lajevardi, N. & Collingwood, L.
Covered in: *The Washington Post (Monkey Cage)*
- “The Role of Identity Prioritization: Why Some Latinx Support Restrictionist Immigration Policies and Candidates.” 2020. *Public Opinion Quarterly*, 84: 860–891. w/ Hickel, F., Alamillo, R. & Collingwood, L.
- “Perceived Discrimination and Political Behavior.” 2020. *British Journal of Political Science*, 50(3): 867-892.
- “The Paradox Between Integration and Perceived Discrimination Among American Muslims.” 2020. *Political Psychology*, 41(3): 587-606. w/ Lajevardi, N., Walker, H. & Westfall, A.
Winner of the 2019 American Political Science Association Race, Ethnicity, and Politics Section Best Paper Award.

“Veiled Politics: Experiences with Discrimination among Muslim Americans.” 2019. *Politics and Religion*, 12(2): 629-677. w/ Dana, K., Lajevardi, N., & Walker, H.

“Partisan Attitudes toward Sanctuary Cities: The Asymmetrical Effects of Political Knowledge.” 2018. *Politics and Policy*, 46 (6): 951-984. w/ Dreier, S. & Collingwood, L.

“A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump’s Muslim Ban.” 2018. *Political Behavior*, 40: 1035-1072. w/ Collingwood, L. & Lajevardi, N.

Covered in: *The Washington Post (Monkey Cage)*, *Vox*, *ThinkProgress*, *NPR*, *Al Jazeera*, *Middle East Eye*, *Psychology Today*, & *Social Psych Online*

“Old-Fashioned Racism, Contemporary Islamophobia, and the Political Isolation of Muslim Americans in the Age of Trump.” 2018. *Journal of Race, Ethnicity, and Politics*, 3(1): 112-152. w/ Lajevardi, N.

“The Politics of Choice Reconsidered: Partisanship, Ideology, and Minority Politics in Washington’s Charter School Initiative.” 2018. *State Politics and Policy Quarterly*, 18(1): 61-92. w/ Collingwood, L. & Jochim, A.

“Muslims in Great Britain: The Impact of Mosque Attendance on Political Behaviour and Civic Engagement.” 2018. *Journal of Ethnic and Migration Studies*, 44(9): 1479-1505. w/ Dana, K.

“eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC.” 2016. *R Journal*, 8(2): 92-101. w/ Collingwood, L., Barreto, M. & Garcia-Rios, S.

“How Discrimination Impacts Sociopolitical Behavior: A Multidimensional Perspective.” 2016. *Political Psychology*, 37(5): 613-640.

“Mosques as American Institutions: Mosque Attendance, Religiosity and Integration into the Political System among American Muslims.” 2011. *Religions*, 2(4): 504-524. w/ Dana, K. & Barreto, M.

Book Chapters/
Encyclopedic
Entries

“Discrimination.” In *Edward Elgar Encyclopedia of Political Sociology* edited by Maria Grasso and Marco Giugni. (Forthcoming)

“Race and Racism in U.S. Campaigns.” 2020. In *Oxford Handbook on Electoral Persuasion* edited by Liz Suhay, Bernie Grofman, and Alex Trechsel, 15:278–295. w/ Christopher Parker, Christopher Towler, and Loren Collingwood.

Book Reviews	<p>“Understanding Muslim Political Life in America: Contested Citizenship in the Twenty-First Century.” Edited by Brian R. Calfano and Nazita Lajevardi. Philadelphia: Temple University Press, 2019. 248p. Perspectives on Politics.</p>																																		
Public Writing	<p>“Biden reverses Trump’s ‘Muslim Ban.’ Americans support the decision.” The Washington Post (Monkey Cage) (27 January, 2021). w/ Lajevardi, N. and Collingwood, L.</p> <p>“Targeted: Veiled Women Experience Significantly More Discrimination in the U.S.” Religion in Public (21 January, 2020). w/ Dana, K., Lajevardi, N., and Walker, H.</p> <p>“Here’s what the Democrats need to do to get the DREAM Act through Congress.” LSE American Politics and Policy Blog (29 January, 2018). Also covered by Newsweek U.S. Edition. w/ Walker, H. and Garcia-Rios, S.</p> <p>“Why Individual-Level Opinion Rapidly Shifted Against Trump’s ‘Muslim Ban’ Executive Order.” Religion in Public (17 January, 2018). w/ Collingwood, L. and Lajevardi, N.</p> <p>“Allies in name only? Latino-only leadership on DACA may trigger implicit racial biases among White liberals.” LSE American Politics and Policy Blog (28 September, 2017). w/ Garcia-Rios, S. and Walker, H.</p> <p>“Protests against Trump’s immigration executive order may have helped shift public opinion against it” LSE American Politics and Policy Blog (12 February, 2017). w/ Collingwood, L. and Lajevardi, N.</p>																																		
Grants, Fellowships, & Awards	<table border="0"> <tr> <td>Nominee of UD’s Excellence in Teaching Award</td> <td style="text-align: right;">(2023)</td> </tr> <tr> <td>UD Provost Teaching Fellow</td> <td style="text-align: right;">(2022-)</td> </tr> <tr> <td>APSA Race, Ethnicity, and Politics Best Paper Award w/ N. Lajevardi, H. Walker and A. Westfall</td> <td style="text-align: right;">(2019)</td> </tr> <tr> <td>AAPOR Student-Faculty Diversity Pipeline Award</td> <td style="text-align: right;">(2019)</td> </tr> <tr> <td>CTAL Instructional Improvement Grant: Engaging Diversity in Political Science w/ Kara Ellerby (\$11,000)</td> <td style="text-align: right;">(2018)</td> </tr> <tr> <td>POSCIR Seed Research Grant (\$1,500)</td> <td style="text-align: right;">(2018)</td> </tr> <tr> <td>DEL General University Research Grant (\$7,500)</td> <td style="text-align: right;">(2017)</td> </tr> <tr> <td>UW Political Science Research Fellowship (est. \$13,000)</td> <td style="text-align: right;">(2016)</td> </tr> <tr> <td>Dissertation Improvement Research Grant, UCLA (\$3000)</td> <td style="text-align: right;">(2015)</td> </tr> <tr> <td>Dean Recognition for Exceptional Pedagogical Contribution, UW</td> <td style="text-align: right;">(2014)</td> </tr> <tr> <td>Best Graduate Paper in PoliSci (w/Hannah Walker), UW</td> <td style="text-align: right;">(2014)</td> </tr> <tr> <td>UW Center for Democracy & VRA Research Fellowship (\$5,000)</td> <td style="text-align: right;">(2014)</td> </tr> <tr> <td>UW Center for Democracy & VRA Research Fellowship (\$5,000)</td> <td style="text-align: right;">(2013)</td> </tr> <tr> <td>Center for Statistics and the Social Sciences Grant (\$1,000)</td> <td style="text-align: right;">(2013)</td> </tr> <tr> <td>UW WISER Research Grant (\$2500)</td> <td style="text-align: right;">(2011-14)</td> </tr> <tr> <td>UW WISER Survey Research Fellowship (\$20,000)</td> <td style="text-align: right;">(2011-14)</td> </tr> <tr> <td>Grad. Opportunities & Minority Achievement Fellowship (\$4,000)</td> <td style="text-align: right;">(2010-11)</td> </tr> </table>	Nominee of UD’s Excellence in Teaching Award	(2023)	UD Provost Teaching Fellow	(2022-)	APSA Race, Ethnicity, and Politics Best Paper Award w/ N. Lajevardi, H. Walker and A. Westfall	(2019)	AAPOR Student-Faculty Diversity Pipeline Award	(2019)	CTAL Instructional Improvement Grant: Engaging Diversity in Political Science w/ Kara Ellerby (\$11,000)	(2018)	POSCIR Seed Research Grant (\$1,500)	(2018)	DEL General University Research Grant (\$7,500)	(2017)	UW Political Science Research Fellowship (est. \$13,000)	(2016)	Dissertation Improvement Research Grant, UCLA (\$3000)	(2015)	Dean Recognition for Exceptional Pedagogical Contribution, UW	(2014)	Best Graduate Paper in PoliSci (w/Hannah Walker), UW	(2014)	UW Center for Democracy & VRA Research Fellowship (\$5,000)	(2014)	UW Center for Democracy & VRA Research Fellowship (\$5,000)	(2013)	Center for Statistics and the Social Sciences Grant (\$1,000)	(2013)	UW WISER Research Grant (\$2500)	(2011-14)	UW WISER Survey Research Fellowship (\$20,000)	(2011-14)	Grad. Opportunities & Minority Achievement Fellowship (\$4,000)	(2010-11)
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Grad. Opportunities & Minority Achievement Fellowship (\$4,000)	(2010-11)																																		

	Donald R. Matthews Graduate Fellowship (\$40,000)	(2010-11)
	Jody Deering Nyquist Award for Excellence in Public Speaking	(2008)
Research Center/ Academic Affiliations	Data Science Institute (DSI), UD	(2023 -)
	Master of Science in Data Science (MSDS), UD	(2023 -)
	Center for Political Communication, UD	(2016 -)
	Center for the Study of Diversity, UD	(2016 -)
	Race, Justice, Policy Research Initiative, UD	(2017-23)
	UW Center for Democracy and Voting Rights Research	(2013-14)
	Washington Institute for the Study of Race & Ethnicity (WISER)	(2010-16)
	Center for Social Science and Statistics (CSSS), UW	(2010-16)
	Washington Survey Research Center (WASRC)	(2010-15)
Teaching Experience	University of Delaware (2016 -)	
	POSC 150: Intro to American Politics (x10)	
	POSC 230: Intro to Politics and Social Justice (x2)	
	POSC 413: Minority Politics, Representation, and Voting Rights (x4)	
	POSC 867: Race, Ethnicity, and Politics (Graduate Seminar) (x3)	
	POSC 807: American Political Behavior (Graduate Seminar) (x1)	
	University of Washington (2011-2016)	
	POLS 202: Intro to American Politics (x2)	
	POLS 357: Minority Representation and the Voting Rights Act (x1)	
	POLS 205: Political Science as a Social Science (TA)	
	POLS 317: US Race and Ethnic Politics (TA)	
	POLS 353: US Congress (TA)	
	POLS 503: Advanced Research Design and Analysis (TA)	
	LAW E 558: Voting Rights Research and the Law (TA)	
External Invited Talks/Panels	“Pernicious Prejudice: Scholarly Approaches to Antisemitism and Islamophobia.” Harvard University . Panel Cosponsored by the Edmond & Lily Safra Center for Ethics, Center for Jewish Studies, Center for Middle Eastern Studies, Center for American Political Studies, and FAS Civil Discourse Initiative. May 1, 2024.	
	“Diversity and the State of Democratic Citizenship.” Featured invited roundtable sponsored by the Center for the Study of Democratic Citizenship . April 23, 2021.	
	“Shocks to the System: Capturing Opinion Shift and Stability Toward Trump’s Muslim Ban.” Keynote Speaker at the Democracy and Diversity Triannual Conference at the Center for the Study of Democratic Citizenship in Montreal, Canada. April 24-25, 2020. [Cancelled Due to COVID-19]	

“The New American Electorate.” Panelist. **Princeton University**. Event sponsored by the Center for the Study of Democratic Politics. April 3, 2020. [Cancelled Due to COVID-19]

“Neighboring Identities: Psychological and Political Reactions to Generalized and Particularized Anti-Immigrant Appeals.” w/Sergio Garcia-Rios. **University of Toronto**. Talk Sponsored by the Department of Political Science. March 6, 2020.

“History, Institutions, and Theory Research Coordination Network on Racial and Ethnic Politics.” Panelist. **University of Pennsylvania**. Event sponsored by the American Political Science Association’s Special Projects Fund and the Center for the Study of Ethnicity, Race and Immigration at Penn. February 28-29, 2020.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **Rutgers University**. Talk sponsored by the Emerging Trends Lecture Series & the Center for the Experimental Study of Politics and Psychology. April 27, 2018.

“A Change of Heart? Using Panel Designs to Establish Causality with Real Events.” w/Loren Collingwood. **Princeton University**. Talk sponsored by the Center for the Study of Democratic Politics. April 26, 2018.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **University of California Los Angeles**. Talk sponsored by the Race, Ethnicity and Politics Workshop. March 5, 2018.

“Muslim-American Attitudes, Sociopolitical Behavior, and Identity.” Panelist/Section Presenter. **University of California Los Angeles**. Event sponsored by the Luskin School of Public Affairs & the National Science Foundation. December 15, 2017.

“Muslim-American Political Behavior.” Panelist/Section Presenter. **Menlo College**. Event sponsored by Menlo College & the National Science Foundation. December 16, 2016.

Internal or
Public
Invited
Talks/Panels

“American Presidency and Political Power.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. June 21, 2024.

“How Democratic is the U.S. Constitution, and to What Extent did the Founding Fathers Oppose Majority Rule?” Speaker. University Day Public Lecture. March 18, 2023.

“Executive Power and the U.S. Democracy.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. July, 2022 & 2023.

“Race, Ethnicity, and Gender in the 2020 Election.” Speaker. Panel sponsored by the the University of Delaware POSCIR. December 14, 2020.

“Building Community: Scholarship and Connection among Faculty of Color.” Speaker. Panel sponsored by the Center for the Study of Diversity (CSD) at the University of Delaware. February 24, 2020.

“Executive Power and the U.S. Democracy.” Talk sponsored by the 2019 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2019.

“Opinion Shift and Stability: Long-Lasting Opposition toward Trump’s Muslim Ban.” Talk sponsored by the Department of Sociology and Criminal Justice Colloquium Speaker Series at the University of Delaware. April 24, 2019.

“Old-Fashioned Racism and the Roots of Contemporary Islamophobia.” Talk sponsored by the Center for the Study of Diversity (CSD) Colloquium Speaker Series at the University of Delaware. December 6, 2018.

“Understanding Executive Power in the United States.” Talk sponsored by the 2018 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2018.

“The Inclusion and Exclusion of Minority Groups in the United States.” Talk sponsored by the 2017 YALI Mandela Washington Fellows Program at the University of Delaware. July 11, 2017.

“Inclusion and Exclusion: Perceptions of Discrimination in the Workplace.” Diversity Summit Presenter. Talk sponsored by the Office of Equity and Inclusion at the University of Delaware. June 20, 2017.

“What Happens Now Part II? A Forum to Discuss Bigotry & Closed Borders in the Trump Era.” Speaker. Panel sponsored by the Department of Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, & the College of Arts and Sciences at the University of Delaware. February 13, 2017.

“Forum on the Travel Ban Executive Order.” Speaker. Panel sponsored by the University of Delaware Provost Office. February 7, 2017.

“What Happens Now Part I? Fear, Diversity, and Inclusion in Post-U.S. Election.” Speaker. Panel sponsored by Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, History, & the College of Arts and Sciences at the University of Delaware. November

30, 2016.

“Race, Religion, and Gender.” Election Central Panelist. Event sponsored by the Center for Political Communication at the University of Delaware. November 8, 2016.

Select Conference Presentations 2021

“Partisan Winners and Losers: Testing Alternative Frames of Congressional Election Results Among White and Latino Voters.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“How do Political Attacks Affect Racial and Ethnic Self-Identities?” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

2019

“The Significance of Politicized Group Identities: Re-examining the Relationship between Contact with Punitive Political Institutions and Political Participation.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Threat or Reassurance? Framing Midterm results among Latinos and Whites.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“When American Identity Trumps Latinx Identity: Explaining Support for Restrictive Immigration Policies.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Anti-Minority Politics and Political Participation: Evidence from Four Countries.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

2018

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Symposium on the Politics of Immigration, Race, and Ethnicity (SPIRE) Meeting in Philadelphia, PA (University of Pennsylvania).

“Are Integrated Muslim Americans More Likely to Perceive Discrimination?” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Opinion Shift and Stability: Enduring Individual-Level Opposition to Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Collaborative Multiracial Post-Election Study (CMPS) Meeting in Los Angeles, CA (UCLA).

2017

“A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“Veiled Politics: Experiences with Discrimination among American Muslims.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“The Racial Shield as Racism Exoneration: Explaining White Racist Support for Conservative Minority Candidates.” Paper Presentation at the Annual Western Political Science Association Conference (WPSA) in Vancouver BC, Canada.

2016

“Assessing the Mechanism Linking Discrimination to Democratic Engagement.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Philadelphia, PA.

“Estimating Candidate Support: Comparing EI and EI-RxC.” Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA) in Chicago, Illinois.

Student
Supervision

Sadie Ellington, Dissertation Committee Member (POSC)
Enes Aksu, Dissertation Committee Member (POSC)

Enes Tuzgen, Dissertation Committee Member (POSC)
Olga Gerasimenko, Dissertation Committee Member (POSC)
Furkan Karakayan, Dissertation Committee Member (POSC)
Richard Takyi Amoah, Dissertation Committee Member (ECON)
Sheila Afrakomah, Dissertation Committee Member (ECON)
Ahmet Ates, Dissertation Committee Member (POSC)
Charles Mays, Long Paper and Dissertation Chair (POSC)
Ian Mumma, Long Paper Committee Member (POSC)
Clark Shanahan, Long Paper Committee Member (POSC)

Rachel Spruill, Undergraduate Honors Thesis Chair
Jessica Sack, Undergraduate Honors Thesis Chair
Jordan Spencer, Undergraduate Faculty Mentor for the McNair Program
Lauren Turenchalk, Undergraduate Research Supervisor

Professional
Service

Editorial Board Member

Politics and Religion (6/2018 - 12/2021)

Discipline Service

American Political Science Association (APSA) REP Section Chair (2021-2022)

Western Political Science Association (WPSA) Task Force on Equity, Inclusion, and Access in the Discipline (2020-2021)

APSA Race, Ethnicity, and Politics Best Paper Award Committee Member (2020)

University Service

2019 Summer Educational and Cultural Experience Program (SECEP)
Lecturer of Politics and Justice in the United States. (July 27 - August 20, 2019)

Manuscript Reviewer/Referee

American Journal of Political Science, American Political Science Review, American Politics Research, British Journal of Political Science, Belgian Federal office for Science Policy, Behavioral Sciences of Terrorism and Political Aggression, Cambridge University Press, Electoral Studies, European Political Science Review, International Journal of Public Opinion, Journal of Elections, Public Opinion & Parties, Journal of Ethnic and Migration Studies, Journal of Public Policy, Journal of Politics, Journal of Race, Ethnicity and Politics, Migration Studies, Perspectives on Politics, Political Behavior, Politics, Groups, and Identities, Political Psychology, Political Research Quarterly, Politics and Religion, Public Opinion Quarterly, Social Science Quarterly, Time-Sharing Experiments for the Social Sciences

Conference Coordination

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Delaware. (2020)

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Washington. (2013)

Latinos and the Voting Rights Act. Center for Democracy and Voting Rights Research at the University of Washington Law School. (2013)

Islam in the Public Sphere Conference. Washington Institute for the Study of Race & Ethnicity (WISER). (2011)

Select Expert
Consulting
Experience

State of Maryland Attorney General's Office; 2021 MD Redistricting

Baltimore County Branch of the NAACP v. Baltimore County, Maryland, No. 1:21-cv-03232-LKG (D. Md. 2022)

Common Cause Florida v. Lee, 4:22-cv-109-AW-MAF (N.D. Fla.)

Common Cause Florida v. Byrd, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed]

Dickinson Bay Area NAACP Branch v. Galveston County, Texas, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified]

Reyes v. Chilton, 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed]

Roswell Independent School District (RISD); 2022 Redistricting

Caroline County Branch of the NAACP v. Town of Federalsburg, Civ. Action No. 23-SAG-00484 (D.Md. 2023)

Cobb County Board of Elections and Registration, No. 1:22-cv-02300-ELR (N.D. Ga. 2022)

Coca v. City of Dodge City, et al. Case no. 6:22-cv-01274 (D Kan. 2022) [Deposed & Testified]

Soto Palmer v. Hobbs, No. 3:22-cv-05035-RSL (W.D. Wash. 2021) [Testified]

Stone v. Allen, No. 2-21-cv-1531 (N.D. Ala. 2021) [Deposed]

Wicomico County Branch of the NAACP et al v. Wicomico County, MD, Civ. Action No. 23-MJM-03325 (D. Md. 2023)

New York Communities for Change et al v. County of Nassau, NY, No. 602316/2024 (N.Y.S.)

Previous Research Positions	Senior Researcher, Washington Poll 2010-2014 <i>Public Opinion Survey Design, Programming, and Analysis.</i>
	Researcher, Center for Democracy & Voting Rights Research 2013-2014 <i>Racially Polarized Voting (RPV) Analysis of jurisdictions in states such as: California, Florida, Texas, and Washington.</i>
	Investigator, Washington State Charter School Initiative 2013 <i>Precinct and school district level data collection and analysis of the I-1240 Vote for S360 Polling Firm and Melinda & Gates Foundation.</i>

Skills & Additional Information	Software: R, STATA, \LaTeX , ESRI, DRA Languages: Farsi (Persian)–Native Speaker R Packages: eiCompare (contributor), eiExpand (contributor)
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