Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE CONFERENCE OF THE NAACP, *et al.*, *Plaintiffs*, v. ALAN HIRSCH, in his official capacity as Chair of the North Carolina State Board of Elections, *et al.*, *Defendants*, PHILIP E. BERGER, in his official capacity as President Pro Tempore of the North Carolina Senate, and TIMOTHY K. MOORE, in his official capacity as Speaker of the North Carolina House of Representatives *Legislative Defendant Intervenors.*	No. 1:18-cv-01034

SECOND SUPPLEMENTAL EXPERT REPORT OF LORRAINE C. MINNITE

Plaintiffs' Exhibit 1116

I. SUMMARY OF OPINIONS

Attorneys for plaintiffs in this case asked me[1] to review any new evidence of voter fraud in North Carolina since the filing of my Supplemental Expert Report in October 2021. As described below, I have conducted a thorough review of the public record, and the opinions I expressed in my Preliminary Expert Report, filed in September 2019, and my Supplemental Expert regarding the rarity of voter fraud in North Carolina have not changed. I stand by those opinions and conclude the following:

A. Between 2021 and 2023, prior to the 2023 Municipal elections, the North Carolina State Board of Elections referred 55 cases of potential voter fraud, including five cases of possible voter impersonation, to prosecutors for further investigation and where merited, prosecution. If all 55 cases are actual cases of voter fraud, the fraud rate would be .00095 percent of all ballots cast.

B. If all five cases of possible voter impersonation are actual cases of fraud, approximately one in 1.15 million ballots cast between October 2021 and March 2023 may have been cast by an imposter. The form of voter fraud most likely to be prevented by requiring that voters show an acceptable form of photo identification is voter impersonation.

C. The lack of evidence substantiating a problem suggests that long-standing protections against voter impersonation and voter fraud in place in North Carolina before the implementation of S.B. 824 have been effective and therefore, are sufficient in meeting the state's responsibility to ensure elections are free of fraud. I reiterate the opinion I expressed in my previous reports: the addition of a voter photo identification requirement to election security procedures that were already in place serves no essential purpose as a prophylactic measure to address (practically non-existent) voter impersonation or any other form of voter fraud in North Carolina.

II. ANALYSIS OF INCIDENCE OF VOTER FRAUD IN NORTH CAROLINA SINCE OCTOBER 2021

To conduct my review of any new evidence of voter fraud since October 2021, I used the same methods of data gathering from public sources as I did for my preliminary and supplemental expert reports. For this second supplement to my preliminary report, they include:

- Materials produced by the North Carolina State Board of Elections (SBOE), including press releases from October 2021 to March 2024; 26 Numbered Memos issued from October 2021 to March 19, 2024; meeting agendas, minutes and recordings, and associated materials for the last 38 SBOE meetings (where available, from November 2, 2021 to March 11, 2024); post-election audit reports available for four of the six elections conducted since I wrote my supplemental expert report that occurred prior to the implementation of S.B. 824 with the 2023 Municipal Election cycle (audits for the November 2, 2021 Municipal Elections; May 17, 2022 Primary and Municipal Elections;

[1] My current *curriculum vitae* is attached here as Appendix A.

July 26, 2022 Municipal Election and Local Second Primaries; and November 8, 2022 General Election;);[2] additional documents posted to the agency's website addressing election security, the new voter photo identification rules and other pertinent issues;

- All news releases by the North Carolina Attorney General since October 1, 2021, and any other relevant documents I could find on the Attorney General's website, in particular, a Case Declination Summary of the North Carolina Department of Justice's investigation into allegations of election fraud by Mark and Debra Meadows;

- Press releases from the U.S. Attorney's Office for the U.S. District Courts (Eastern, Middle and Western) of North Carolina regarding issues related to voting and voter fraud in North Carolina since October 2021;

- Materials produced by County Boards of Elections to Plaintiffs in this case in response to public records requests, including 'Photo ID Exception Forms' filed by voters in the October and November 2023 Municipal Elections and related documents from 45 counties; and a record of public comment from more than 1,200 individuals collected through an online portal over a three-week period from June 2 to June 23, 2023, at a hearing of the SBOE on proposed rules regarding the implementation of North Carolina's new voter photo identification law;

- More than 200 news articles appearing in a search of more than 70 different North Carolina newspapers and other news sources between October 1, 2021 and March 15, 2024;

- Pleadings, opinions, transcripts and other materials in two state lawsuits brought by Republican Party allied groups challenging rulemaking regarding signature matching procedures, absentee ballot return deadlines, and the enforcement of regulations on partisan at-large election observers by the North Carolina State Board of Elections (*In re Appeal of Declaratory Ruling from the State Board of Elections* (State of North Carolina, General Court of Justice, Superior Court Division, Wake County, No. 22-CVS-10520, August 22, 2022) and *Deas v. North Carolina State Board of Elections* (State of North Carolina, General Court of Justice, Superior Court Division, Wake County, No. 22-CVS-011290, September 9, 2022));

- Video recording of a July 20, 2023 meeting of the North Carolina Rules Review Commission considering the SBOE's temporary rulemaking proposals concerning implementation of the photo identification process in the October and November 2023 elections;

- Cases of election fraud in North Carolina recorded by the Heritage Foundation and posted to their online Election Fraud database; and information from other websites of

[2] The two other local elections conducted over this period were local extremely low turnout affairs:1) a Nash County Public Schools Board of Education (December 6, 2022, 753 votes cast); and 2) a March 7, 2023 Town of Dobson Commissioner Election (Surry County, 199 votes cast).

organizations that promote the idea that voter fraud is rampant in U.S. elections and that U.S. elections lack "integrity" as a result (or whose leaders or staff promote these claims), such as the Public Interest Legal Foundation, the North Carolina Voting Integrity Project, the Conservative Partnership Institute, the North Carolina Election Integrity Teams, and the North Carolina Republican Party.

My previous research found very little voter fraud in North Carolina over the last two decades; and once again, my effort to find voter fraud that may have influenced elections in North Carolina since October 2021 was futile. In what follows, I discuss my analysis of the primary sources listed above and reviewed for this report.

North Carolina State Board of Elections and State and Federal Prosecution Records

SBOE Referrals to Prosecutors

As discussed in my previous two expert reports, the North Carolina State Board of Elections has statutory authority to "…investigate when necessary or advisable, the administration of election laws, frauds and irregularities in elections in any county and municipality and special district, and shall report violations of the election laws to the Attorney General or district attorney or prosecutor of the district for further investigation and prosecution."[3] With respect to voter fraud, the SBOE has prioritized the investigation of culpable conduct in actions that could result in significant harm to the conduct or administration of elections, including vote buying, organized absentee ballot fraud, and knowing or intentional violations of the laws protecting the integrity of the vote.[4]

The Chair of the SBOE has subpoena power, but the Board does not have the authority to prosecute violations of the law itself.[5] It encourages county election officials and the general public to report allegations of election law violations and fraud to its Investigations Division, which is staffed with experienced professional investigators who specialize in election law.[6] All complaints are reviewed and cases opened if a priority area can be identified in the complaint. The SBOE also shares information with the North Carolina State Bureau of Investigation if there is evidence to substantiate that a violation has occurred. At the conclusion of an investigation, a copy of the file is provided to the appropriate district attorney or U.S. attorney for further investigation, and if merited, criminal prosecution. Updating a data series I reported on in my Supplemental Expert Report, Table 1 summarizes all cases of potential fraud referred to prosecutors by the SBOE for the period 2021 through mid-2023.

[3] N.C.G.S. § 163-22.

[4] North Carolina State Board of Elections, "Elections-Related Investigation Priorities Policy," Adopted October 1, 2019, and Revised December 19, 2023; available at https://s3.amazonaws.com/dl.ncsbe.gov/Investigations/Elections-Related-Investigations-Priorities-Policy-2023-Revised.pdf.

[5] N.C.G.S. § 163-23.

[6] See, generally, the North Carolina State Board of Elections Investigations Division website, available at https://www.ncsbe.gov/about-elections/election-security/investigations-division.

Table 1
North Carolina State Board of Elections
Referred Cases*
2021 to Mid-2023

	2021	2022	Mid-2023**	Total
Double Voter	12	5	8	**25**
Felon Voter	16	6	0	**22**
Felon Registrant	0	0	0	**0**
Impersonation of a Voter	4	1	0	**5**
Vote-buying	0	0	0	**0**
ABS Fraud	1	0	0	**1**
Voter Registration	0	0	0	**0**
Non-citizen Registrant/Voter	1	0	0	**1**
Other	0	0	1	**1**
Total	**34**	**12**	**9**	**55**

Source: North Carolina State Board of Elections 'Referred Cases' files (see Footnote 6).
* Data as of March 12, 2024.
** All complaints in these cases pre-date the 2023 Municipal Elections.

There was one major mid-term federal and statewide election, and five municipal, primary or special elections in North Carolina in which nearly 5.7 million (5,743,034) votes were cast between 2021 through March 2023. The trends in referred cases are consistent with past years both in reflecting the rarity of voter fraud overall, and especially with respect to voter impersonation, the main form of voter fraud that photo identification requirements are designed to prevent.

If every case of potential illegal voting referred to prosecutors over this two-and-a-half year period was an actual case of fraud, the fraud rate would be .00095 percent, or approximately one case of fraud for every 104,419 votes cast. The new photo identification requirement might have prevented just five of the 55 cases of potential illegal voting and represented just one of every 1.15 million ballots counted over the study period. If those five cases of possible voter impersonation were actual cases of voter impersonation, the rate of voter impersonation fraud would be .00008 percent. In other words, North Carolina's new photo identification requirement might have prevented voter fraud that may have occurred in recent North Carolina elections when no photo identification was required at a rate of .00008 percent of all counted ballots. As a fraud prevention tool, photo identification is like a 2,000 pound bomb dropped to kill a gnat that may or may not be flying around.

Some have challenged the use of prosecution records to measure the incidence of voter fraud. But even if we are missing 90 percent of all actual cases of voter impersonation – and there is no reason to think this might be the case – then the rate at which imposters may have cast fraudulent votes in recent North Carolina elections would be .0008 percent, or one of every 115,000 ballots counted, a rate not impossible, but highly unlikely to change the outcome of any election. What is more likely is that voter impersonation, because it presents high costs to the imposter along with extremely low benefits, is an extremely rare event. Requiring voters to present a photo identification to make it 'harder to cheat' by impersonating an eligible voter will have little effect on the already infinitesimally small rate at which voter impersonation occurs.

SBOE Post-election Audits

The SBOE and county boards generally conduct one or more audits of each election. For the 2021 through March 2023 period, four of the six elections conducted were audited. A voter history audit compares the number of ballots cast to "authorization to vote" or ATV forms collected from each registered voter casting a ballot on Election Day; from one-stop applications collected during the early voting period; and from the information provided by voters on the outer absentee ballot collection envelope. Ideally, these two basic numbers – the number of ballots cast, and the record of voters checking in across different voting modalities – should match. There are valid reasons, however, why they might be slightly off, specifically, human error on the part of voters or election workers.

The SBOE voter history audit reports for the November 2, 2021, May 5th, July 26th, and November 8th elections in 2022, found no evidence that vote totals had been manipulated in any way. Except for several small discrepancies that generally were otherwise accounted for by county election officials, the physical ballots cast matched the number of voters who checked in at the polls on Election Day or at early voting sites, or who returned absentee ballots in these four elections.[7]

Other audits, such as the risk-limiting 'sample audit,' which tests for the accuracy of the voting machines, or a 'close contest' or 'provisional' audit which compares the margin of victory in any single election with the sum of possible variances across elections as determined by the voter history or sample audits also found no evidence that would have jeopardized election outcomes.[8]

Although these audits are more geared toward flagging potential human error than voter fraud, they could uncover anomalies that upon further investigation reveal a broader form of election fraud. For example, if the 'close contest' audit finds that the margin of victory is less than the summation of possible variances determined by the voter history or sample audits, further audits are conducted to check for issues related to the variances and any provisional ballots cast.[9] Under current North Carolina law, voters whose eligibility or qualifications are in question may cast provisional ballots.[10] According to the SBOE,

> When further auditing of provisional data is necessary, analysts process data from several data sources, including the DMV database…Data analysts execute matching algorithms to determine whether provisional voters were eligible to vote in the counties where they presented to vote. Additionally, if needed, audit results are sent to county boards of

[7] All audit reports discussed here are available at the North Carolina State Board of Elections, "Post-Election Procedures and Audits," website, available at https://www.ncsbe.gov/about-elections/election-security/post-election-procedures-and-audits.

[8] *Ibid*.

[9] *Ibid*.

[10] N.C.G.S. § 163-166-11.

elections, which analyze them and, where appropriate, amend their canvasses to reflect any changes.[11]

How might the close contest or provisional audit ensure that electoral outcomes are not marred by fraud, including in the past when photo identification was not mandatory? First, requiring voters to register to vote is one of many mechanisms in place designed to prevent voter fraud. An imposter voter could try to impersonate either a real person who is registered to vote or a fraudulently registered fake person. He or she could try to do that in person on Election Day at the polls, or at a one-stop early voting site, or through illegally obtaining an absentee mail-in ballot. If no photo identification is required to vote, to successfully impersonate a real registered voter, the imposter must know that that person has not already voted. Only registered voters are permitted to cast ballots in North Carolina. No state, including North Carolina, allows just anyone to walk in off the street, obtain a ballot, cast that ballot and have the ballot counted. When a voter attempting to cast a ballot appears not to be registered – perhaps because the voter is an imposter, but much more likely because there are errors in the registration records or the voter made mistakes – that voter may cast a provisional ballot in North Carolina that is not counted unless election officials can later verify that the voter is properly registered. This was the case both before and after the implementation of S.B. 824 during the 2023 Municipal election cycle.

An example of how auditing adds an additional layer of protection in ensuring that electoral outcomes are legitimate is provided in the SBOE's audit report for the July 26, 2022 election. Post-election audits can identify the range within which irregularities, including voter fraud but also human error, could have occurred in an election. Compared to vote tallies, they can flag outcomes that should receive additional scrutiny for accuracy. This was the case with the SBOE's audit of Cumberland County in the July 26, 2022 election. Their 'close contest' audit report states that the audit "revealed no issues that could jeopardize election outcomes under the jurisdiction of the State Board." But, since "…the City of Fayetteville City Council District 03 contest in Cumberland County was very close ([a] difference of six votes)," and the variance identified by the audit was two ballots more than the voter history count (at [the] county level), "…[a]full recount was conducted by the county, which resulted in no change to the election outcome."[12]

Beyond the voter history audit, none of the other types of post-election audits for the four audited elections identified possible fraud or anomalies of any significance that have could have jeopardized electoral outcomes.

I reviewed the minutes of all SBOE meetings held, and all Numbered Memos issued since October 2021, for any issues or controversies concerning allegations or cases of voter fraud. The specific matters that were dealt with by the SBOE and that are most relevant to my search for evidence of voter fraud since 2021, concern the security of absentee ballot procedures and signature matching, and the promulgation of new rules to comply with the implementation of the new voter photo

[11] North Carolina State Board of Elections, "Audit Results for the July 26, 2022 Elections," August 16, 2022, 2, available at https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/2022-08-16/Canvass_July26_2022/Audit_Report_20220726.pdf.

[12] *Ibid.*

identification requirements in the 2023 Municipal elections. Of less relevance, but a matter I also reviewed pertained to the SBOE's efforts to promulgate temporary rules concerning poll watching after a survey of county election boards reported problems and concerns about aggressive behavior by poll watchers in the May 2022 elections.[13] No evidence of voter fraud was introduced or discussed across the several SBOE meeting in which these issues were discussed.

Actions of State and Federal Prosecutors

State Investigations and Indictments

My search for cases of voter fraud investigated or prosecuted by state and federal law enforcement agencies found very little evidence. One case that was investigated at the state level but received national news coverage involved the alleged false residency claims of former President Trump's Chief of Staff and former U.S. Representative from North Carolina's 11th Congressional District, Mark Meadows.

In March 2022, *The New Yorker* magazine reported that Meadows was registered to vote from a mobile home in Scaly Mountain, North Carolina that he did not own, and where he had no record of ever living or even being present.[14] Meadows voted an absentee ballot in the 2020 general election from that address. The North Carolina Department of Justice opened in inquiry and nine months later, after the State Bureau of Investigation concluded its investigation, the Department of Justice declined to prosecute Meadows for committing a felony because they did not believe they could prove beyond a reasonable doubt that Meadows had knowingly sworn to false information.[15]

My search of North Carolina news sources turned up only one other instance of alleged voter fraud identified and investigated by state election and law enforcement officials over my study period. This matter involved the indictment of eight people by a Brunswick County grand jury after an SBOE investigation found "numerous" cases of individuals swearing falsely in a primary or general election.[16] Four of the eight, all of whom were convicted felons who registered or voted in the 2020 election cycle, were arrested in 2022. Their voting histories show that three of them voted in either the 2020 primary or the 2020 general election; the ballot of the fourth person was discovered, challenged and removed during the 2020 general election. I have not been able to determine the status of the other four people.

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[13] The SBOE's proposed temporary rules for clarifying what poll observers can and cannot do were later blocked by the North Carolina Rules Revision Commission.

[14] Charles Bethea, "Why Did Mark Meadows Register to Vote at an Address Where He Did Not Reside?," *New Yorker*, March 6, 2022.

[15] North Carolina Department of Justice, Memorandum from Leslie Cooley Dismukes and Boz Zellinger to Attorney General Josh Stein, "Case Declination Summary," December 30, 2022, 6, available at https://ncdoj.gov/wp-content/uploads/2022/12/Meadows-declination-12-30-22.pdf.

[16] Jamey Cross, "8 People Were Indicted for Voter Fraud in Brunswick this Month; Here's the Latest," *Wilmington Star News*, February 28, 2022.

The SBOE records I examined and that are summarized in Table 1 indicate that only one case, not eight, was referred to the Brunswick County district attorney over the 2021-2023 period. News reports state that the eight people were indicted for 'false swearing,' which suggests these were ineligible voters who mistakenly registered or voted, not actual cases of voter fraud. S.B. 824's photo identification requirement likely would not have prevented voting by these alleged ineligible voters as the fact of their ineligibility was discovered by election officials during the canvas period.[17] Two of the four ineligible voters who were arrested were registered as Republicans and two as Democrats. The county chairs of the two major political parties asserted their support for election integrity in the wake of the indictments. The Brunswick County Republican Party chair praised the work of local election officials, stating "I'm proud that the county board of elections – on their own – has been enforcing the law and trying to be as fair as possible for both sides."[18]

Federal Investigations and Indictments

I also searched for evidence of voter fraud investigated by federal prosecutors, specifically the U.S. Attorneys' offices for the Eastern, Middle and Western Districts of North Carolina, and the U.S. Department of Justice's Criminal Division. That search turned up just one case of voter fraud in North Carolina prosecuted at the federal level.

On November 16, 2021, a federal grand jury sitting in the Eastern District of North Carolina returned a 10-count indictment charging Garbart Piquant with passport fraud, voting by an alien, and falsely claiming to be a U.S. citizen in order to register to vote. Mr. Piquant, who was born in the Bahamas, used a fake Virginia birth certificate to obtain a U.S. passport. In 2014, when Mr. Piquant applied to renew his U.S. passport, the U.S. Department of State's Diplomatic Security Service initiated an investigation into the veracity of his Virginia birth certificate. Before he was indicted seven years later, Mr. Piquant registered to vote in North Carolina and used his fraudulently-obtained U.S. passport and North Carolina voter registration card to successfully apply for a REAL ID driver's license from the North Carolina Division of Motor Vehicles. Between 2018 and 2020, Mr. Piquant voted in every primary and general election in North Carolina, and he cast ballots in person, during early voting, and using absentee ballots.

North Carolina's new voter photo identification law would not have prevented Mr. Piquant's fraudulent ballots from being cast and counted because Mr. Piquant had successfully (and fraudulently) obtained a North Carolina driver's license. In September 2022, Mr. Piquant entered into a year-long pretrial deferred prosecution agreement with the U.S. Attorney for the Eastern District of North Carolina.

Data on Provisional Balloting in North Carolina's October and November 2023 Elections

As noted, S.B. 824's provisions for voter photo identification were first implemented in the 2023 Municipal Election cycle. According to proponents of S.B. 824, who argue that voter identification laws "serve states' legitimate interests in preventing voter fraud and in ensuring

[17] *Ibid.*

[18] *Ibid.*

'public confidence in the integrity of the electoral process,'"[19] the purpose of the North Carolina legislature in passing S.B. 824 and overriding Governor Roy Cooper's veto was to "protect the integrity of and public confidence in elections."[20] Indeed, when North Carolina's 2013 photo identification requirement (H.B. 589, enacted as Session Law 2013-381) was struck down by the U.S. Court of Appeals for the Fourth Circuit in 2016, legislative defendants in the extant case, North Carolina State Senate President Pro Tempore Phil Berger and House Speaker Tim Moore, issued a joint statement expressing their displeasure with the ruling and reinforcing the notion that the purpose of photo identification is to prevent voter fraud:

> Since today's decision by three partisan Democrats ignores legal precedent, ignores the fact that other federal courts have used North Carolina's law as a model, and ignores the fact that a majority of other states have similar protections in place, we can only wonder if the intent is to reopen the door for voter fraud, potentially allowing fellow Democrat politicians like Hillary Clinton and Roy Cooper to steal the election.[21]

But supporters of photo identification have also argued that the rarity of voter fraud prosecutions can be explained in part by the lack of photo identification requirements, meaning that photo identification is needed not only to *prevent* but to *detect* such fraud.[22]

So far, my review of the evidence of voter fraud in North Carolina since 2021 has focused on recent elections in which photo identification was *not* required. But if the rarity of voter fraud in North Carolina is due to the fact that photo identification has not until now been required of voters, and if photo identification requirements actually help to detect voter fraud, then we should see some evidence that voter fraud in the 2023 Municipal Primary and General elections, which were administered under S.B. 824's photo identification rules.

If a voter goes to the polls and is unable to show an acceptable photo identification verifying that he or she is the person he or she claims to be, the voter should be offered to a provisional ballot and is required to fill out a "Photo ID Exception Form" indicating that he or she had a lawful 'reasonable impediment' to obtaining or showing the identification.[23] County boards review these

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[19] Proposed Intervenors' Memorandum in Support of Their Motion to Intervene, *North Carolina State Conference of the NAACP v. Cooper (Hirsch)*, Case No. 1:18-cv-01034 (M.D.N.C., Jan. 14, 2019), 2, citing *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 196-97 (2008) (plurality) and at 209 (Scalia, Thomas, and Alito, JJ., concurring in the judgment).

[20] *Ibid.*, 10.

[21] "Berger, Moore Respond to Politically-Motivated Ruling Blocking Voter ID," July 29, 2016, https://www.philberger.org/berger_moore_respond_to_politically_motivated_ruling_blocking_voter_id; and on Facebook, https://www.facebook.com/SenatorBerger/posts/10153614015900064/?paipv=0&eav=AfYzTEJdBa8iK4mrlbb2Xr80e7uxN3iSxenltizXoUr2voKqpmhd1oQEVeNzvY0nYrU&_rdr.

[22] Hans von Spakovsky, "Voter Photo Identification: Protecting the Security of Elections," Report, Heritage Foundation, July 13, 2011, available at https://www.heritage.org/report/voter-photo-identification-protecting-the-security-elections.

[23] North Carolina State Board of Elections, "Voter ID," available at https://www.ncsbe.gov/voting/voter-id.

forms and must count the provisional ballot unless they unanimously agree that the form was falsely completed. They must put this finding in writing after first giving the voter an opportunity to address the board on the matter.[24]

Counsel for Plaintiffs in this case made public records requests of the county boards of elections for various documents related to the 2023 Municipal Elections held on October 10th and November 7th, including:

- All Photo ID Exception Forms, including all forms submitted during early voting, and any documentation of the boards' review processes of these forms;
- All documents relating to provisional ballots cast by voters due to their inability to produce an acceptable form of photographic identification;
- All documents relating to mail-in ballots cast by voters that were unable to produce a copy of a photographic identification or had some other difficulty with the voter identification requirement, and all communications, procedures, and documentation involved;
- All records (recordings, minutes, transcripts) of county board meetings at which implementation of the new voter identification rules was discussed;
- All ballots challenged by poll workers, poll observers, board members, or otherwise related to voter identification;
- All documents related to provisional ballot hearings;
- All incident reports related to voter identification filed by election officials during the October 10th and November 7th municipal elections; and,
- All communications, including emails, letters, and voicemails between county boards and the North Carolina State Board of Elections pertaining to voter identification.

Counsel shared the documents they received from 45 county boards with me. I reviewed these materials and found no evidence of voter fraud or that the photo identification requirements of S.B. 824 helped to detect voter fraud in the 2023 Municipal Elections.

Other Sources

Finally, as I did when I first supplemented my 2019 Preliminary Expert Report, I reviewed other governmental and non-governmental sources that I had consulted to write my Preliminary report in order to update any new information. For this second supplement, I again revisited some of those same sources, including an exhaustive review of North Carolina newspapers for coverage of voter fraud allegations or cases; court cases concerning the security from fraud of North Carolina elections; a challenge to the administrative procedures adopted by the SBOE for implementing the new voter photo identification requirements; and a scan of information posted to websites of organizations that promote the notion that voter fraud is a serious problem in U.S. elections, including in North Carolina.

[24] North Carolina State Board of Elections, Numbered Memo 2023-03, September 14, 2023, updated February 23, 2024.

One of the most important of these other sources is the Washington D.C.-based Heritage Foundation, which has long advocated for more restrictive registration and voting laws justified by the organization's position that voter fraud is a rampant problem of unknown scale.[25] The organization maintains a database of what it calls "a sampling of recent proven instances of election fraud from across the country."[26] As I reported in my 2021 Supplemental Expert Report, at the time, the database contained no cases of voter or election fraud for North Carolina after 2019 and the SBOE's conclusory finding of organized absentee ballot fraud in the Ninth Congressional District's 2018 election. Since then, the database has been updated and now records the convictions of seven people who participated in the conspiracy coordinated by Leslie McCrae Dowless to illegally obtain and submit absentee ballots for the Republican candidate in that race.[27] To commit the fraud, Dowless and his co-conspirators illegally "assisted" legally registered voters to obtain their absentee ballots, sometimes later forging information and witness signatures. Given the scale and brazenness of Dowless' methods, in which real, eligible, registered voters were manipulated, it seems reasonable to assume he and his co-conspirators could have also obtained copies of voters' photo identification to append to their absentee ballots if S.B. 824 had been in place. In other words, it is not likely that S.B. 824 would have prevented Dowless' illegal conspiracy to rig the Ninth Congressional District's election.

In addition to the seven Dowless co-conspirators, all of whom pleaded guilty to various felony charges such as conspiracy to commit possession of absentee ballots and conspiracy to swear falsely, the Heritage Foundation Election Fraud database also contains the cases of 13 non-citizens charged with illegally registering to vote, and in two cases, casting illegal ballots in the 2016 election. I discussed the nearly four-year federal investigation that led to charging these individuals and several others in my Supplemental Expert Report.

I have since learned that it was the SBOE that first notified the U.S. Attorney's Office in the Eastern District of North Carolina in 2016 or 2017, that an internal audit had identified several hundred individuals who were not citizens and were registered to vote and that some of them may have voted. As a consequence of the U.S. Justice Department's investigation (described in my Supplemental Expert Report), 26 individuals were prosecuted for illegally voting in the 2016 election. Many, however, were not prosecuted because according to a March 19, 2021 letter to the SBOE Executive Director from the Acting U.S. Attorney for the Eastern District of North Carolina, they did not lie on their voter registration forms. Instead, they were mistakenly registered by North Carolina elections officials. Moreover, others were mistakenly registered to vote through the Division of Motor Vehicle's "motor voter" process when the citizenship questions on the voter registration forms were mistakenly pre-populated with information indicating that the person was

[25] John Malcolm, "No One Knows Full Extent of Election Fraud. That's Why We Track It," Commentary, Heritage Foundation, May 25, 2021.

[26] Heritage Foundation, "About the Election Fraud Database," December 21, 2020, available at https://www.heritage.org/article/about-the-election-fraud-database.

[27] See, Order, *In the Matter of: Investigation of Election Irregularities Affecting Counties Within the 9th Congressional District*, North Carolina State Board of Elections, March 19, 2019, available at https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/Congressional_District_9_Portal/Order_03132019.pdf.

a citizen and therefore eligible to vote. Some of these noncitizens reported that they informed the DMV that they were not citizens and got registered anyway.[28]

Other than the Dowless co-conspirators and some of the non-citizens charged as a result of the U.S. Attorney's Office's investigation, there are no other cases of voter or election fraud documented in the Heritage Foundation database for North Carolina.

The Voting Integrity Project of North Carolina is another organization that has promoted the false notion that voter fraud and election fraud are rampant, focusing its work exclusively on North Carolina.[29] I could not find any credible evidence of voter fraud committed in North Carolina since 2021, that was gathered or produced by the organization or shared on its website. The organization's founder, Mr. Jay Delancey, testified before North Carolina Rules Review Commission (RRC) at a July 20, 2023 meeting in which the RRC was considering the SBOE's request for approval of temporary rules for implementing the photo identification law. Mr. Delancey objected to various features of the Photo ID Exception Form created by the SBOE, as required by the legislature, claiming:

> As always, this agency [the SBOE] has worked in every litigation they do, and every action they take, they want to extend the opportunity for people to abuse whatever law there is to make voting, in their words, to make it 'more accessible,' in our words, to make it 'more fraud friendly.'[30]

Mr. Delancey provided no information or evidence that registered North Carolina voters who might use the Photo ID Exception Form because they are unable to present an acceptable photo identification are likely to commit fraud, or even how that might occur.

More problematic than the minuscule number of actual fraudulent votes that were cast in North Carolina over the last thirty years, are the legitimate votes lost when duly eligible and registered voters are not able to comply with unnecessary voting rules. There is evidence in the materials shared with me that registered voters had their votes cancelled because they were unable to produce acceptable photo identification.

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[28] Letter from G. Norman Acker III to Karen Brinson Bell, March 19, 2021, available at https://s3.amazonaws.com/dl.ncsbe.gov/Press/Acker_Letter_to_NCSBE_March_19_2021.pdf; see Ms. Bell's March 22, 2021 letter in response here: https://s3.amazonaws.com/dl.ncsbe.gov/Press/Correspondence_Acker_03212021.pdf.

[29] *North Carolina State Conference of the NAACP v. McCrory*, Expert Report of Lorraine C. Minnite, No. 1:13-cv-00658-TDS-JEP (M.D.N.C.), 17-18. See also, Ari Sen, "UNC Factcheck: 'Voter Integrity Project' Spreading Misinformation about Absentee Ballots, 9th District Election," Mediahub, July 24, 2019, available at http://mediahub.unc.edu/voter-integrity-project-spreading-misinformation-about-absentee-ballots-9th-district-election/.

[30] North Carolina Office of Administrative Hearings, Rules Review Commission, Testimony of Mr. Jay Delancey, July20, 2023; available at https://ncgov.webex.com/recordingservice/sites/ncgov/recording/94dc28f9092a103c9c3c00505681c45d/playback, at minute 58:04.

Following the 2023 Municipal elections and actual experience with the new photo identification requirements, the SBOE invited public comment on its proposed permanent rules for implementing the law. The Southern Coalition for Social Justice, Democracy North Carolina, and Common Cause North Carolina submitted a letter in response. Relying, in part, on a report published by Democracy North Carolina that documents problems for voters with the inconsistent and arbitrary implementation of the photo identification requirements in some counties, the letter states that 305 voters cast provisional ballots using the Photo ID Exception Form, claiming a 'reasonable impediment' to providing a photo identification. Of this number, 49 voters had their forms and therefore their ballots rejected. Another 268 voters who lacked the mandated identification cast provisional ballots on condition that they were to return with their ID; 175 of them did not return, and as a result, their ballots were cancelled. The letter states,

> Reports indicate that County Boards implemented voter photo ID inconsistently when voters presented without photo ID or with unacceptable photo ID, leading to confusion and frustration. In some cases, voters' ID Exception Forms were wrongfully rejected – and their ballots were wrongfully discounted – based on Board members' personal opinions. In others, voters never received notice to return to the County Board to present photo ID after leaving the polling place.[31]

Votes lost to bureaucratically-redundant rules are as precious as votes "diluted" by fraud.

III. CONCLUSION

This report reviews publicly available information and materials shared with me by Plaintiffs' counsel to assess the empirical record of voter fraud in the state of North Carolina since the filing of my Supplemental Expert Report in this case in October, 2021. Between that time and now, the North Carolina State Board of Elections has referred five potential cases of voter impersonation to district attorneys, the primary form of voter fraud a photo identification requirement might prevent. If all five of these cases are actual cases of voter impersonation, relative to the total number of votes cast in North Carolina over the three-year period (5,767,153), one in 1.15 million votes counted may have been cast by an imposter.

As reported in my first Supplemental Expert Report, as a result of a federal investigation, some two dozen non-citizens were charged with having illegally registered to vote in North Carolina, and at least two further violated the law by casting ballots in the 2016 general election. S.B. 824's voter identification requirements would not have prevented all of the these cases of illegal non-citizen registration and voting because legal permanent residents may legally obtain driver's licenses.

[31] Letter from Southern Coalition for Social Justice, Democracy North Carolina, Common Cause North Carolina to North Carolina State Board of Elections, January 16, 2024, 3, available at https://southerncoalition.org/wp-content/uploads/2024/01/2024.01.16_Voter-Photo-ID-Permanent-Rules-Comment-Ltr.pdf.

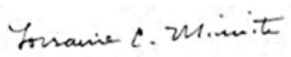
With the county boards of election, the SBOE conducted 12 different audits of four of the seven elections conducted between October 2021 and September 2023. None of those audits or recounts found any issues that could have jeopardized the outcomes of those elections.

My review of materials from the 2023 Municipal Elections produced by the county boards of elections in response to public records requests by by counsel for Plaintiffs in this case found no evidence to support the claim that photo identification can help detect voter fraud.

The conclusion we must draw from the evidence analyzed here and in my previous two expert reports, therefore, is that the safeguards against voter fraud[32] erected prior to the implementation of S.B. 842 in the 2023 Municipal Elections were working well and should have had the fullest public confidence behind them. The new photo identification requirement will likely have little impact on the incidence of voter fraud in North Carolina because it was already exceedingly rare before the law was passed in 2018 and before it was implemented in 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



Executed on: April 5, 2024

Lorraine C. Minnite

[32] North Carolina criminalizes all forms of voter and election fraud. See N.C.G.S. Chapter 163, Article 22 "Corrupt Practices and Other Offenses Against the Elective Franchise." See also, North Carolina State Board of Elections, "10 Facts About Election Security in North Carolina," n.d., available at https://s3.amazonaws.com/dl.ncsbe.gov/Media_Kits/YourVoteCountsNC/ElectionSecurity_10TalkingPoints.pdf; North Carolina State Board of Elections ,"Statement about Absentee Ballot Security in North Carolina," Press Release, July 31, 2020, available at https://www.ncsbe.gov/news/press-releases/2020/07/31/statement-about-absentee-ballot-security-north-carolina; and the SBE's website on "Election Security," available at https://www.ncsbe.gov/election-security.

APPENDIX A

LORRAINE CAROL MINNITE

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Dept. of Public Policy & Administration
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Camden, New Jersey 08102
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EDUCATION

The Graduate School and University Center of the City University of New York
Ph.D. in Political Science
Dissertation: "Identity, Voting Rights and the Remapping of Political Representation in New York City"
Honors: Distinction

M.Phil. in Political Science
Major field: American Politics
Minor field: Public Policy

M.A. in Political Science
Master's Thesis: "The Ecology of the Underclass: William Julius Wilson and the Chicago School"

Boston University, College of Liberal Arts
B.A. in History
Area of Concentration: American Civilization

ACADEMIC EXPERIENCE

Associate Professor
Rutgers, The State University of New Jersey – Camden Campus, 2011 to present.
Teach graduate courses in public policy and community development, and undergraduate courses in urban studies and voting rights.

Assistant Professor
Barnard College, Columbia University, January 2000 to 2011.
Taught undergraduate courses in American politics and urban studies.

Associate Director
The Center for Urban Research and Policy, Columbia University, December 1993 to 2000.
Responsible for the day-to-day management of the Center; wrote grant proposals and helped secure funding from government and private sources for all activities totaling nearly $2,000,000.

Instructor and Research Associate
Metropolitan Studies Department, New York University, Spring 1991.
Designed and taught a core course for undergraduates on the political and economic development of post-war American cities.

Assistant Program Director
Borough of Manhattan Community College, City University of New York, 1987 to 1990.
Assisted the Director in all administrative aspects of the BMCC Summer Immersion Program, a non-traditional, intensive, remedial education program.

PEER-REVIEWED PUBLICATIONS

Books

Research Handbook on Electoral Manipulation, Edward Elgar Publishers, *under contract.*

The Myth of Voter Fraud, Ithaca, New York: Cornell University Press, 2010.

Keeping Down the Black Vote: Race and the Demobilization of American Voters, New York: The New Press, 2009; co-authored with Frances Fox Piven and Margaret Groarke.

Journal Articles

"New Challenges in the Study of Right-wing Propaganda: Priming the Populist Backlash to 'Hope and Change,'" *New Political Science* 34:4 (2012), 506-526.

"Modeling Problems in the Voter ID-Voter Turnout Debate," *Election Law Journal* 8:2 (2009), 85-102; co-authored with Robert S. Erikson.

"Models, Assumptions, and Model Checking in Ecological Regressions," *Journal of the Royal Statistical Society* 164, Part 1 (2001), 101-118; co-authored with Andrew Gelman, David K. Park, Stephen Ansolabehere, and Phillip N. Price.

Chapters in Edited Volumes

"Voter Suppression: The Attack on Rights," in Levon Chorbajian, ed., *Power and Inequality: Critical Readings for a New Era*, 2nd Ed., New York: Routledge, 2021; co-authored with Frances Fox Piven.

"Competing Concepts of Social Class: Implications and Applications for Community Development," in Mae Shaw and Marjorie Mayo, eds., *Class, Inequality and Community Development*, Bristol, UK: Policy Press at the University of Bristol, 2016; co-authored with Frances Fox Piven.

"The Voter Fraud Myth," in Benjamin E. Griffith, ed., *America Votes! Challenges to Election Law and Voting Rights*, Chicago: American Bar Association, 2016.

"Making Policy in the Streets," in James DeFilippis, ed., *Urban Policy in the Time of Obama*, Minneapolis: University of Minnesota Press, 2016*;* co-authored with Frances Fox Piven.

"Poor People's Politics," in David Brady and Linda Burton, eds., *Oxford Handbook of the Social Science of Poverty*, New York: Oxford University Press, 2016; co-authored with Frances Fox Piven.

"Crisis, Convulsion and the Welfare State," in Kevin Farnsworth and Zoë Irving, eds. *Social Policy in an Age of Austerity*, Policy Press, 2015; co-authored with Frances Fox Piven.

"Voter Identification Laws: The Controversy Over Voter Fraud," in Matthew J. Streb, ed., *Law and Election Politics: The Rules of the Game*, 2nd Ed., New York: Routledge, 2012.

"Lost in Translation? A Critical Reappraisal of the Concept of Immigrant Political Incorporation," in Jennifer Hochschild and John H. Mollenkopf, eds., *Bringing Outsiders In: Transatlantic Perspectives on Immigrant Political Incorporation*, Ithaca, New York: Cornell University Press, 2009.

"Environmental Risk and Childhood Disease in an Urban Working Class Caribbean Neighborhood," in Sherrie L. Baver and Barbara Lynch Deutsch, ed., *Beyond Sun and Sand: Caribbean Environmentalisms*, New Brunswick, NJ: Rutgers University Press, 2006; co-authored with Immanuel Ness.

"Outside the Circle: The Impact of Post-9/11 Responses on the Immigrant Communities of New York City," in John H. Mollenkopf, ed., *Contentious City: The Politics of Recovery in New York City*, New York: Russell Sage Foundation, 2005.

"Between White and Black: Asian and Latino Political Participation in the 2000 Presidential Election in New York City," in William E. Nelson, Jr. and Jessica Lavariega Monforti, eds., *Black and Latino/a Politics: Issues in Political Development in the United States*, Miami: Barnhardt and Ash, 2005; co-authored with John Mollenkopf.

"The Changing Arab New York Community," in Kathleen Benson and Philip M. Kayal, eds., *A Community of Many Worlds: Arab Americans in New York City*, Syracuse: Syracuse University Press, 2002; co-authored with Louis Abdellatif Cristillo.

"Social Capital, Political Participation and the Urban Community," in Susan Saegert, J. Phillip Thompson, and Mark Warren, eds., *Social Capital and Poor Communities*, New York: Russell Sage Foundation, 2001; co-authored with Ester R. Fuchs and Robert Y. Shapiro.

"Patterns of Neighborhood Change," in John H. Mollenkopf and Manuel Castells, eds., *Dual City: Restructuring New York*, New York: Russell Sage, 1991; co-authored with Frank F. DeGiovanni.

Encyclopedia Entries

"Voter Participation," in *The Encyclopedia of Social Work*, 20th ed., New York: Oxford University Press, 2008, online version, 2013, updated 2021; reprinted in *The Encyclopedia of Macro Social Work*, 2023; co-authored with Frances Fox Piven.

"The Underclass," in *The International Encyclopedia of Social and Behavioral Sciences*, 2nd Ed., Waltham, Mass.: Elsevier, 2016; co-authored with Paul J. Jargowsky.

"Welfare," in *The International Encyclopedia of Social and Behavioral Sciences*, 2nd Ed., Waltham, Mass.: Elsevier, 2016; co-authored with Joan Maya Mazelis.

"The Working Families Party," in Immanuel Ness, ed. *The Encyclopedia of American Third Parties*, Armonk, New York: M.E. Sharpe, Inc., 2000.

OTHER PUBLICATIONS

"Ask A Political Scientist: A Discussion with Frances Fox Piven about Movement Power," *Polity* 53:1 (2021), 189-201.

"Putting a Band-Aid on a Gunshot Wound," Online Symposium: Richard L. Hasen, *Election Meltdown: Dirty Tricks, Distrust, and the Threat to American Democracy*, *Boston University Law Review* 100, Online 273 (2020).

Chapter in Conference Proceedings

"The Political Participation of Immigrants in New York," in *In Defense of the Alien: Proceedings of the 2000 Annual National Legal Conference on Immigration and Refugee Policy*, Vol. XXIII. New York: Center for Migration Studies, 2001; co-authored with Jennifer Holdaway and Ronald Hayduk.

Book Reviews and Essays

Review Essay: *The Advantage of Disadvantage: Costly Protest and Political Representation for Marginalized Groups* by LaGina Gauss, Cambridge University Press, 2022, in *Political Science Quarterly*, *forthcoming*.

Election Fraud: Detecting and Deterring Electoral Manipulation edited by R. Michael Alvarez, Thad Hall and Susan D. Hyde, *Election Law Journal* 8:3 (2009).

Governing From Below: Urban Regions and the Global Economy by Jefferey M. Sellers, Cambridge University Press, 2002, in *Political Science Quarterly* Vol. 118, No. 4 (Winter 2003-2004).

Social Class, Politics, and Urban Markets: The Makings of Bias in Policy Outcomes by Herman L. Boschken, Stanford, CA: Stanford University Press, 2002, in *The International Journal of Urban and Regional Research*, Vol. 27, No. 4 (December 2003).

The Miami Fiscal Crisis: Can A Poor City Regain Prosperity? by Milan J. Dluhy and Howard A. Frank, Westport, Connecticut: Praeger Publishers, 2002, in *Political Science Quarterly* Vol. 117, No. 4 (Winter 2002-2003).

Research Reports, Memoranda and Briefs

The Misleading Myth of Voter Fraud in American Elections, Key Findings Brief, Scholars Strategy Network, February 2014.

Latino New Yorkers in the 2008 Presidential Election: The New Americans Exit Poll, New York Latino Research Network (NYLARNet) at The University of Albany, Fall 2011.

Research Memo: First-time Voters in the 2008 Election, Project Vote, Washington, D.C., April 2011.

An Analysis of Who Voted (And Who Didn't Vote) in the 2010 Election, Project Vote, Washington, D.C., November 2010.

Research Memo: Debunking the Tea Party's Election Night Message, Project Vote, Washington, D.C., October 26, 2010.

What Happened to Hope and Change? A Poll of 2008 Voters, Project Vote, Washington, D.C., September 2010.

Election Day Registration: A Study of Voter Fraud Allegations and Findings on Voter Roll Security, Dēmos – A Network for Ideas and Action, New York, November 2007.

The Politics of Voter Fraud, Project Vote, Washington, D.C., March 2007.

Securing the Vote: An Analysis of Election Fraud, Dēmos – A Network for Ideas and Action, 2003, New York; updated 2007; co-authored with David Callahan.

Journalism

My expertise on elections and voter fraud was sought and widely cited and I was quoted in print and broadcast media in every federal election since 2008, including, for example, in the following: *The New Yorker Magazine*, *The New Yorker Radio Hour*, *The New Republic*, *Mother Jones*, *The Wall Street Journal*, *In These Times*, *American Prospect*, *Washington Monthly*, *Monthly Review*, *New Left Review*, *The New York Times*, *The Washington Post*, *The Christian Science Monitor, Associated Press*, *The Guardian*, McClatchy, Al Jazeera English (*Fault Lines*, Washington, D.C.), WZBC (*News*, Boston), WBAI (*Democracy Now!*, New York), WNYC (*The Brian Lehrer Show*, New York), WHYY (*Radio Times*, Philadelphia), NPR (*Morning Edition*, Washington, D.C.), CBS News, ABC News Radio, Salon.com, Talking Points Memo, Alternet, The Huffington Post, Slate Magazine, PolitiFact, CQ Researcher, and Agence-France Presse, among others.

"Why the Democrats and Movements Need Each Other," *In These Times* (cover story), October 17, 2017; co-authored with Frances Fox Piven.

"The Power of Disruption: An Interview with Frances Fox Piven," *Global Dialogue: Newsletter for the International Sociological Association* 5(4): December 2015.

"The Myth of Voter Fraud," BillMoyers.com, March 9, 2015.

"Movements Need Politicians – And Vice Versa," *The Nation*, October 22, 2012; co-authored with Frances Fox Piven.

"The Other Campaign: Who Gets To Vote," *New Labor Forum*, May 2012; co-authored with Frances Fox Piven.

"Why We Need ACORN," *Los Angeles Times*, April 22, 2010; co-authored with Frances Fox Piven.

"Re-Drawing the Map of U.S. Politics," *Red Pepper*, April, 2008; co-authored with Frances Fox Piven.

"N.C. Rejects Politics of Fear," *The Charlotte Observer*, Charlotte, North Carolina, July 18, 2007.

"They Are Arriving: Immigrants Are Gaining Power in New York's Voting Booths," *New York Daily News,* New York, July 24, 2005.

"Albany's Making Bad Elections Worse," *New York Daily News,* New York, August 22, 2004.

UNPUBLISHED PAPERS, PRESENTATIONS AND REPORTS

Works in Progress

"*'Never Did I Think Casting A Ballot Was Something that Could Get You in Trouble*:' The Racist Fraud of Voter Fraud"

"Urban Antipoverty Policy as Movement Spark? The Case of Mobilization for Youth"

"Community Development as Collective Reparations"

"Human Error in Election Administration"

"*Demosprudence* and Grassroots Struggles to Protect and Expand the Right to Vote"

"Does Concentration Worsen Poverty? The Case of Philadelphia"

Conference Participation, Papers and Invited Presentations

"The Criminalization of Voting and the Fraud of Voter Fraud," paper accepted for presentation at the 120th Annual Meeting of the American Political Science Association, Philadelphia, Pennsylvania, September 5-8, 2024.

"Urban Antipoverty Policy as Movement Spark? The Case of Mobilization for Youth," paper accepted for presentation at the 52nd Annual Meeting of the Urban Affairs Association, New York City, New York, April 24-27, 2024.

"Community Development as Collective Reparations," paper presented at the 10th Biennial Conference of the Urban History Association, Pittsburgh, Pennsylvania, October 26-29, 2023.

"Community Development as Collective Reparations," paper presented at the 51st Annual Meeting of the Urban Affairs Association, Nashville, Tennessee, April 26-29, 2023.

Discussant, "Local Election Officials and Election Management," Conference Within a Conference, 91st Annual Meeting of the Southern Political Science Association, San Juan, Puerto Rico, January 9-11, 2020.

"Human Error in Election Administration," paper presented at the 89th Annual Meeting of the Southern Political Science Association, New Orleans, January 4-6, 2018.

Invited Panelist, "Impasses: Beyond Social Democracy," Transcending Pessimism, Reimagining Democracy: A Conference in Honor of Leo Panitch, York University, Toronto, October 6-7, 2017.

Invited Lecture, "The Politics of Voting: Who Shall Be the Electors?" Saul O. Sidore Lecture Series, Centers on Race, Class and Gender in a Divided America, University of New Hampshire-Manchester, Manchester, New Hampshire, March 21, 2017.

"Deadwood and Disenfranchisement: Maintaining Election Lists in the United States," paper presented at the 87th Annual Meeting of the Southern Political Science Association, New Orleans, January 12-14, 2017; co-authored with Margaret Groarke.

Invited Speaker, "Defending Democracy: How Political Scientists Are Engaging in the Fight Over Voting Rights (And Why You and Your Dept. Should Too)," roundtable presented by the Scholars Strategy Network at the 112th Annual Meeting of the American Political Science Association, Philadelphia, September 1-4, 2016.

Invited Panelist, "Beyond Neoliberalism: Social Justice after the Welfare State," Symposium Sponsored by the Center for the Study of Social Difference, Women Creating Change, the Heyman Center for the Humanities, and the History Department at Columbia University, New York City, April 2, 2016.

Invited Panelist, "Voting Rights at 50," 22nd Annual First Monday Celebration, Eric R. Neisser Public Interest Program, Rutgers School of Law, Newark, New Jersey, October 7, 2015.

Panel Organizer and Chair, "Electoral Rules, Voting and Turnout: New Pathways for Research," panel at the 111th Annual Meeting of the American Political Science Association, San Francisco, September 3-6, 2015.

"Community and Class in a Neoliberal Age," paper presented at the 110th Annual Meeting of the American Sociological Association, Chicago, August 22-25, 2015; co-authored with Frances Fox Piven.

"Black Urban Liberalism: A Case Study of Democratic Inclusion and Economic Exclusion in Philadelphia, 1970-2010," paper presented at the 45th Annual Meeting of the Urban Affairs Association, Miami, April 8-11, 2015.

Invited Speaker, "Does Concentration Worsen Poverty? The Philadelphia Case," Center for Urban Research and Education, Rutgers University, Camden, December 12, 2014.

Invited Speaker, "The State of Voting Rights," sponsored by the Atlanta Chapter of the Scholars Strategy Network, Atlanta, December 2, 2014.

"The Poverty of Politics in a Northern City: A Case Study of Democratic Inclusion and Economic Exclusion in Philadelphia, 1970-2000," paper presented at the 39th Annual Meeting of the Social Science History Association, Toronto, November 6-9, 2014.

"Crisis, Convulsion and the Welfare State," roundtable presentation at the 109th Annual Meeting of the American Sociological Association, San Francisco, August 16-19, 2014; co-authored with Frances Fox Piven.

"Making Policy in the Streets," paper presented at the 44th Annual Meeting of the Urban Affairs Association, San Antonio, March 20, 2014; co-authored with Frances Fox Piven.

Invited Panelist, "Voter Suppression, Equal Rights, and the Promise of Democracy," sponsored by the Scholars Strategy Network, the Center for American Political Studies, and the Malcolm Wiener Center for Social Policy, Harvard University, March 6, 2014.

"Crisis, Convulsion and the Welfare State," paper presented at the 11th Annual Meeting of the European Sociological Association, Torino, Italy, August 28-31, 2013; co-authored with Frances Fox Piven.

Invited Panelist, "Anatomy of A Public Interest Lawsuit: Voter ID Legislation – A Public Interest Legal Challenge," sponsored by Penn Law Clinical Programs, Lawyering in the Public Interest, Toll Public Interest Center, American Constitution Society and the Civil Rights Law Project, University of Pennsylvania Law School, Philadelphia, Pennsylvania, November 5, 2012.

Invited Panelist, "Disenfranchise This: The Cost of Voter Suppression," 19th Annual First Monday Celebration, Eric R. Neisser Public Interest Program, Rutgers School of Law, Newark, New Jersey, October 3, 2012.

Invited Panelist, "The Voting Rights Act: Where Do We Go From Here?" Rutgers University Law Review Symposium, Trenton, New Jersey, April 13, 2012.

Invited Panelist, "Voting Rights," Civil Rights Law Society, Columbia University Law School, New York City, March 20, 2012.

Invited Panelist, "Race and Public Policy," conference at George Mason University School of Public Policy, Arlington, Virginia, October 10, 2011.

Invited Panelist, "Organizing the Poor for Rights: The Work of Frances Fox Piven," 107th Annual Meeting of the American Political Science Association, Seattle, September 1-4, 2011.

"Is Political Polarization Good or Bad for Democracy?," paper presented at the 69th Annual Meeting of the Midwest Political Science Association, Chicago, March 30-April 2, 2011.

Invited Roundtable Participant, "Voter Disenfranchisement in American Politics," 82nd Annual Meeting of the Southern Political Science Association, New Orleans, January 6-8, 2011.

Invited Panelist, “Voter Participation,” New York City Charter Revision Commission, New York City, June 2, 2010.

Discussant, “Immigrant Voters: Asian Americans and the 2008 Election,” Immigration Seminar Series, Graduate School and University Center of the City University of New York, May 4, 2009.

“Purging Voters Under the NVRA,” paper presented at the 67th Annual Meeting of the Midwest Political Science Association, Chicago, April 2-5, 2009; co-authored with Margaret Groarke.

Invited Panelist, “Democracy in America: The African-American Experience – Then, Now and Future,” U.S. Mission to the United Nations, New York, March 17, 2009.

Invited Speaker, “Voter Suppression in the 2008 Presidential Election,” Funders Committee for Civic Participation, Washington, D.C., December 9, 2008.

Invited Panelist, “Stealing the Vote in 2008,” A Panel Discussion at New York University, October 16, 2008.

Invited Panelist, “Keeping Down the Vote: Vote Suppression and the 2008 Election,” Sarah Lawrence College, September 23, 2008.

“Modeling Problems in the Voter ID-Voter Turnout Debate,” paper presented at the 8th Annual State Politics and Policy Conference, Temple University, Philadelphia, May 30-31, 2008; co-authored with Robert S. Erikson.

Panelist, “Keeping Down the Black Voter: Race and the Demobilization of American Voters,” *Left Forum*, New York, March 16, 2008.

Panel Discussant, "Group Mobilization, Partisanship, Ideas, and Leadership: The Los Angeles and New York Mayoral Elections of 2005," 102nd Annual Meeting of the American Political Science Association, Philadelphia, August 31-September 3, 2006.

"Re-thinking Immigrant Political Incorporation," paper presented at the 36th Annual Meeting of the Urban Affairs Association, Montreal, Canada, April 19-22, 2006.

"Immigrant Politics in an Age of Terror," paper presented at the 101st Annual Meeting of the American Political Science Association, Washington, D.C., September 1-4, 2005.

Panel Discussant, "Immigrants As Local Political Actors," 100th Annual Meeting of the American Political Science Association, Chicago, September 1-4, 2004.

Invited Lecturer, "Literature of Immigration," New Jersey Council for the Humanities Teacher Institute, Monmouth University, Long Branch, New Jersey, August 5, 2004.

"The Impact of 9/11 on Immigrant Politics in New York, With a Focus on Arab, Muslim, and South Asian Immigrant Communities," Columbia University Seminar on the City, New York City, March 23, 2004.

Invited Participant, "The Impact of Post-9/11 Immigration and Law Enforcement Policies," The Century Foundation, New York City, February 4, 2004.

Workshop Participant, Multi-race Study Group, *Harvard CAPS Workshop on Methodologies to Study Immigrant Political Incorporation*, Harvard University, Cambridge, October 30-31, 2003.

Invited Lecturer, "Literature of Immigration," New Jersey Council for the Humanities Teacher Institute, Monmouth University, Long Branch, New Jersey, July 10, 2003.

Panelist, "Rebuilding Post-War Iraq: Domestic and International Implications;" Community Forum, Barnard College, New York City, April 21, 2003.

"Political Participation and the Neglected Role of Spatial Form;" paper presented at the 33rd Annual Meeting of the Urban Affairs Association, Cleveland, Ohio, March 27-30, 2003.

Invited Speaker, "Teach-In on Iraq;" Barnard College, New York City, November 8, 2002.

Panelist, "Colloquium on Responding to Violence," in honor of Virginia C. Gildersleeve Lecturer, Jody Williams, Barnard Center for Research on Women, Barnard College, New York City, October 25, 2002.

Panel Moderator, "Who is Brooklyn?" at *The Future of Brooklyn* Conference, Brooklyn College, June 7, 2002.

"Asian and Latino Participation in New York City: The 2000 Presidential Election," paper presented at the 97th Annual Meeting of the American Political Science Association, San Francisco, August 29 – September 2, 2001; co-authored with John H. Mollenkopf.

Organizer and Panelist, *The Changing Face of New York's Electorate: The Immigrant Vote in 2000 and Beyond*, A Panel Discussion and Media Briefing sponsored by the New York Immigration Coalition and Barnard College, New York City, May 2, 2001.

Organizer and Panelist, *The Muslim Communities in New York City Project; A One-Day Conference*, sponsored by the Center for Urban Research and Policy and the Middle East Institute at the School of International and Public Affairs, Columbia University, New York City, April 30, 2001.

Panelist, *Democratizing New York City; Re-imagining City Government*, sponsored by the Center for Humanities, CUNY Graduate Center, New York City, March 27, 2001.

Organizer and Panel Moderator, *Independent Politics in A Global World*, sponsored by the Independent Politics Group, CUNY Graduate Center, New York City, October 6-7, 2000.

"Political Capital and Political Participation," paper presented at the 96th Annual Meeting of the American Political Science Association, Washington, D.C., August 31-September 3, 2000; co-authored with Ester R. Fuchs and Robert Y. Shapiro.

"The Political Participation of Immigrants in New York," at *Immigrant Political Participation in New York City; A One-Day Working Conference*, sponsored by the Center for Urban Research/CUNY and the International Center for Migration, Ethnicity, and Citizenship, New York City, June 16, 2000

"The Muslim Community in New York City Project," with Louis Abdellatif Cristillo; *Muslims in New York: An Educational Program for Religious Leaders in New York City*, seminar on faith traditions in New York; sponsored by the Interfaith Center of New York and the Imans Council of New York, New York City, June 14, 2000.

"The Political Participation of Immigrants in New York," Session VI on *Integration of Immigrants and Their Descendants,* Center for Migration Studies 20th Annual National Legal Conference on Immigration and Refugee Policy, Washington, D.C., March 30-31, 2000.

"The Changing Arab New York Community," with Louis Abdellatif Cristillo; *A Community of Many Worlds: Arab Americans in New York City*, symposium sponsored by the Museum of the City of New York, New York City, February 5-6, 2000.

"The Political Incorporation of Immigrants in New York," paper presented at the 95th Annual Meeting of the American Political Science Association, Atlanta, September 1-4, 1999; co-authored with Jennifer Holdaway and Ronald Hayduk.

"Political Capital and Political Participation," co-authored with Ester R. Fuchs and Robert Y. Shapiro; paper presented at the 58th Annual Meeting of the Midwest Political Science Association, Chicago, April 15-17, 1999.

"Racial and Ethnic and Urban/Suburban Differences in Public Opinion and Policy Priorities," paper presented at the 58th Annual Meeting of the Midwest Political Science Association, Chicago, April 15-17, 1999; co-authored with Ester R. Fuchs, Robert Y. Shapiro, and Gustavo Cano.

"The Importance of Full Disclosure of Non-response Due to Refusals and the Nature of Potential Bias in Phone Surveys," with Robert Y. Shapiro, evening workshop presentation to the New York City chapter of the American Association for Public Opinion Research, New York City, March 9, 1999.

"White, Black and Latino Voter Turnout in the 1993 New York City Mayoral Election: A Comparison of Ecological Regression Techniques and Exit Poll Data," paper presented at the 94th Annual Meeting of the American Political Science Association, Boston, September 4, 1998; co-authored with David K. Park and Daniel M. Slotwiner.

Panel Discussant, "Race, Rights, and American Politics;" panel at the 27th Annual Meeting of the Northeastern Political Science Association and International Studies Association-Northeast, Newark, New Jersey, November 9-11, 1995.

"Assessing the Quality of Political Reform: Redistricting and the Case of New York City," paper presented at the Annual Meeting of the New York State Political Science Association, Albany, New York, April 22, 1994.

Research Reports

How to Think About Voter Participation, White Paper, New York City Charter Revision Commission, July 2010.

The Myth of Voter Fraud, White Paper, Dēmos – A Network for Ideas and Action, May 2002.

Evaluation of the New York Immigration Coalition's '200,000 in 2000: New Americans Pledging to Strengthen Democracy and New York' Initiative, Final Report to the New York Foundation, with John H. Mollenkopf, August 2001.

A Study of Attitudes Among Low-Income Parents Toward Environmental Health Risks and Childhood Disease: The Brooklyn College COPC Survey, with Immanuel Ness, June 2001.

Political Participation and Political Representation in New York City; With a Special Focus on Latino New Yorkers, Report of the Columbia University/Hispanic Education and Legal Fund Opinion Research Project, co-authored with Robert Y. Shapiro and Ester R. Fuchs, December 1997.

Expert Participation in Federal and State Voting Rights Cases

Expert Witness, *Missouri State Conference of the NAACP v. State of Missouri*, Circuit Court of Cole County, Missouri, 2023.

Expert Witness, *Mi Familia Vota and Voto Latino v. Fontes*, U.S. District Court for the District of Arizona, 2023.

Expert Report, *Sixth District of the African Methodist Episcopal Church v. Kemp*, U.S. District Court for the Northern District of Georgia, 2022.

Affidavit, *Democratic Party of Pennsylvania v. Kathy Boockvar*, Supreme Court of Pennsylvania, 2020.

Expert Report, *Donald J. Trump, Inc. v. Kathy Boockvar*, U.S. District Court for the Western District of Pennsylvania, 2020.

Expert Witness, *Missouri State Conference of the NAACP v. State of Missouri*, Circuit Court of Cole County, Missouri, 2020.

Expert Report, *North Carolina State Conference of the NAACP v. Hirsch (formerly Cooper)*, U.S. District Court for the Middle District of North Carolina, 2019-present.

Expert Witness, *Fair Fight Action, Inc. v. Raffensperger*, U.S. District Court for the Northern District of Georgia, 2018-2022.

Expert Witness, *League of Women Voters of New Hampshire v. Gardner*, State of New Hampshire Superior Court, Hillsborough, SS, Southern District, 2018.

Expert Witness, *Fish v. Kobach*, U.S. District Court for the District of Kansas, 2016-2018.

Expert Witness, *One Wisconsin Institute v. Nichols et al.*, U.S. District Court for the Western District of Wisconsin, 2016.

Expert Witness, *Lee v. Virginia State Board of Elections*, U.S. District Court for the Eastern District of Virginia, 2016.

Expert Witness, *Ohio Democratic Party v. Husted*, U.S. District Court for the Southern District of Ohio, 2015.

Expert Witness, *North Carolina State Conference of the NAACP v. McCrory*, U.S. District Court for the Middle District of North Carolina, 2014-2016.

Expert Witness, *Veasey v. Perry*, U.S. District Court for the Southern District of Texas, 2014-2015.

Expert Witness, *Frank v. Walker/LULAC (formerly Jones) et al. v. Deininger*, U.S. District Court for the Eastern District of Wisconsin, 2012-2013.

Expert Witness, *Applewhite v. Commonwealth of Pennsylvania*, Commonwealth Court of Pennsylvania, 2012-2013.

Expert Report, *Rutgers University Student Assembly et al. v. Middlesex County Board of Elections*, Superior Court of New Jersey/Middlesex County, 2011.

Expert Witness, *Democratic National Committee, et al. v. Republican National Committee, et al.*, U.S. District Court in the District of New Jersey, 2008-2009.

Amicus Filings and Congressional and Other Testimony

Brnovich v. Democratic National Committee, U.S. Supreme Court, Brief of *Amici Curiae* Empirical Elections Scholars in Support of Respondents, January 2021 (lead author).

Missouri Conference of the NAACP v. State of Missouri, Missouri Supreme Court, Brief of *Amicus Curiae* Professor Lorraine Minnite, Ph.D. *in* Support of Appellants, June 2020.

U.S. Commission on Civil Rights Briefing, "An Assessment of Minority Voting Rights Obstacles in the United States," Raleigh, North Carolina, February 2, 2018 (oral and written testimony).

Shelby County, Alabama v. Holder; U.S. Supreme Court, Brief of Historians and Social Scientists as *Amici Curiae* in Support of Respondents, February 1, 2013 (signatory).

League of Women Voters v. Rokita; Supreme Court of Indiana, Brief of *Amici Curiae* Lonna Rae Atkeson, Matt A. Barreto, Lorraine C. Minnite, Jonathan Nagler, Stephen A. Nuño and Gabriel Ramon Sanchez in Opposition to Defendant's Petition to Transfer, November 2009.

U.S. Senate Committee on Rules and Administration, *Hearing on In-Person Voter Fraud: Myth and Trigger for Voter Disenfranchisement?*, March 12, 2008 (invited written testimony).

Expert Witness, U.S. House Committee on the Judiciary, Subcommittee on the Constitution, Civil Rights and Civil Liberties, *Oversight Hearing on Voter Suppression*, February 26th, 2008 (oral and written testimony).

William Crawford, et al. v. Marion County Election Board, et al.; Indiana Democratic Party, et al. v. Todd Rokita et al.; U.S. Supreme Court, Brief of *Amici Curiae* The Brennan Center for Justice, Demos: A Network for Ideas and Action, Lorraine C. Minnite, Project Vote, and People for the American Way Foundation *in Support of Petitioners*, November 2007.

William Crawford, et al. v. Marion County Election Board, et al.; Indiana Democratic Party, et al. v. Todd Rokita et al.; U.S. Supreme Court, Brief of *Amici Curiae* of Historians and Other Scholars *in Support of Petitioners*, November 2007 (signatory).

Fact Witness, *ACORN et al. v. Bysiewicz*, U.S. District Court in the District of Connecticut, 2004-2005.

RESEARCH AND OTHER GRANTS

Recipient, "A Basic Income for Camden," Growing Democracy Grant, Centennial Center of the American Political Science Association, 2024-2025 ($10,000).

Principal Investigator, "A Basic Income for Camden," Rutgers Equity Alliance for Community Health Grant, 2024 ($81,235).

Recipient, "Urban and Sustainable Development in Cuba," Rutgers University Centers for Global Advancement and International Affairs, Study Abroad International Service Learning Innovation Grant, 2020-2022 ($5,000).

Principle Investigator, "Camden City Exit Poll," Rutgers Research Council Award, 2018-2019 ($2,000).

Co-Recipient, Rutgers University Centers for Global Advancement and International Affairs, 2016 ($10,000).

Recipient, Rutgers University-Camden Learning Abroad Office, Course Development Grant, 2015 ($1,000).

Principle Investigator, "The Political Exclusion of the Urban Poor," Rutgers Research Council Award, 2013-2014 ($3,000).

Recipient, RU FAIR ADVANCE (NSF) Rutgers-Camden Travel Award, March/April 2013 ($1,590).
Funded by the Rutgers University Office for the Promotion of Women in Science, Engineering, and Mathematics (SciWomen) Institutional Transformation grant from the ADVANCE program of the National Science Foundation.

Principal Investigator, "University Collaborative Exit Poll," November 2008 to October 2009 ($30,000). Funded by Columbia University Institute of Social and Economic Research and Policy, Center for Urban Research at the Graduate School and University Center of the City University of New York, and the New York Latino Research and Resources Network at the University of Albany, State University of New York.

Co-Principal Investigator, "2006 New Americans Exit Poll," November 2006 to October 2007 ($10,000). Funded by the Graduate School of Arts and Sciences, Columbia University.

Recipient, Special Assistant Professor Leave Travel Grant, September 2003 to September 2005 ($7,700). Funded by the Provost's Office, Winston Fund, Barnard College.

Recipient, Conference Grant, September 2003 to September 2005 ($3,000). Funded by the Provost's Office, Forman Fund, Barnard College.

Member, Working Group on New York's Recovery from September 11th, June 2002 to June 2005 ($30,000). Funded by the Russell Sage Foundation.

Principal Investigator, "2002 New Americans Exit Poll," December 2002 to March 2003 ($1,800). Funded by the Faculty Research Fund of Barnard College.

Principal Investigator, "Evaluation of the New York Immigration Coalition's '200,000 in 2000' Campaign," July 2000 to July 2001 ($40,000). Barnard College, Columbia University. Funded by the New York Foundation.

Co-Principal Investigator, "Muslim Communities in New York City," July 1998 to July 2001 ($350,000). The Center for Urban Research and Policy, Columbia University. Funded by the Ford Foundation.

ACADEMIC AND PROFESSIONAL HONORS

Rutgers University-Camden Chancellor's Award for Excellence in Mentoring, 2021
Distinguished Alumni Award, Department of Political Science, CUNY Graduate School, 2014
Jay Sigler Award for Teaching Excellence, Rutgers University-Camden Public Administration Student Association, 2013
Affiliated Faculty, Center for Community Leadership, Rutgers University-Camden, 2013 to present
Affiliated Faculty, Center for Urban Research and Education, Rutgers University-Camden, 2012 to present
Civic Engagement Faculty Fellow, Rutgers University-Camden, 2012
Selected a "Top Wonk" in Democracy and Elections, The Agenda Project, 2012
2011 *Choice* Magazine "Outstanding Academic Title" for *The Myth of Voter Fraud*
Carnegie Corporation of New York Special Opportunities Fund Award ($50,000), 2007
Senior Fellow, Dēmos – A Network for Ideas and Action, 2006 to 2014
Member, Working Group on Immigration Challenges, The Century Foundation Homeland Security Project, 2004
Faculty Fellow, Institute for Social and Economic Research and Policy, Columbia University, 2002 to 2011
Member, Working Group on New York's Recovery from 9-11, Russell Sage Foundation, 2002 to 2005
Curriculum Development Award ($1,500), Barnard Project on Diaspora and Migration, 2000
CUNY Graduate School Dissertation Year Fellowship ($10,000), 1996-1997

PROFESSIONAL AFFILIATIONS

American Political Science Association
American Sociological Association
Scholars Strategy Network
Social Science History Association
Southern Political Science Association
Urban Affairs Association
Urban History Association

TEACHING ACTIVITIES

Doctoral Supervision

I am or have served as the chair of 12 doctoral committees at Rutgers University-Camden, and as a committee member for six more candidates. I have also served as an external examiner for a doctoral candidate at the Fielding Graduate School's Program in Human and Organizational Development, and on various doctoral exam and dissertation committees for Columbia University's Political Science Department and Graduate School of Architecture, Planning and Preservation, and the City University of New York's Ph.D. Program in Political Science.

Courses Taught

Rutgers University-Camden (Graduate)
Alternative Development Strategies for Distressed Cities (M.S./Ph.D.)
Civic Engagement, Nonprofits and Community Development (M.S./Ph.D.)
Directed (Independent) Study (M.S./Ph.D.)
Foundations of Policy Analysis (MPA and Executive MPA)
Politics of Community Development (M.S./Ph.D.)
Research Workshop (MPA)
The Solidarity Economy (M.S./Ph.D.)
Theory and History of Community Development (M.S./Ph.D.)
Urbanism and Sustainable Development in Cuba (Undergraduate and Graduate-level Study Trip)

Rutgers University-Camden (Undergraduate)
Honors College Seminar: Democracy and The Right to Vote
Poverty and the Urban Environment

Barnard College, Columbia University (Undergraduate)
American Urban Politics
Contemporary Urban Problems
Dynamics of American Politics
Participation and Democracy
Senior Research Seminar in American Politics
Urban Myths and the American City

New York University (Undergraduate)
The Crisis of the Modern American City

PAID CONSULTANTSHIPS

American Civil Liberties Union Voting Rights Project, 2016-2018; 2020; 2022-present.
Wrote expert reports and testified at trial for plaintiffs in *Fish v. Kobach*, U.S. District Court for the District of Kansas; wrote expert reports and gave deposition trial testimony for plaintiffs in *Missouri Conference of the NAACP v. State of Missouri*, Circuit Court of Cole County, Missouri; wrote expert reports for plaintiffs in *Trump v. Boockvar*, U.S. District Court for the Western District of Pennsylvania; and for plaintiffs in *Sixth District of the African Methodist Episcopal District v. Kemp*, U.S. District Court for the Northern District of Georgia.

Arnold & Porter LLP, 2012-2013, 2019-present.
Wrote expert report and supplemental expert reports for plaintiffs in *North Carolina State Conference of the NAACP v. Hirsch (formerly Cooper)*, U.S. District Court for the Middle District of North Carolina; wrote expert reports for plaintiffs (2012, 2013) and testified (2012) at trial in *Applewhite v. Commonwealth of Pennsylvania*, Commonwealth Court of Pennsylvania.

Elias Law Group, LLP, 2022-2023.
Wrote expert report and testified at trial for plaintiffs in *Mi Familia Vota v. Fontes, and Consolidated Cases*, U.S. District Court for the District of Arizona.

American Civil Liberties Union of Missouri Foundation, 2022-2023.
Wrote expert and supplemental reports for plaintiffs and testified at trial in *Missouri State Conference of the NAACP v. State of Missouri*, Circuit Court of Cole County, Missouri.

Fair Fight Action, Inc., 2018-2022.
Wrote expert reports and testified at trial for plaintiffs in *Fair Fight Act, Inc. v. Raffensperger*, U.S. District Court for the Northern District of Georgia.

Perkins Coie, LLP, 2015-2018.
Wrote expert reports and testified at trial for plaintiffs in *Ohio Democratic Party v. Husted*, U.S. District Court for the Southern District of Ohio, Eastern Division; *Lee v. Virginia State Board of Elections*, U.S. District Court for the Eastern District in Virginia, Richmond Division; *One Wisconsin v. Wisconsin Government Accountability Board* in the U.S. District of the Western District of Wisconsin; and *League of Women Voters of New Hampshire v. Gardner*, State of New Hampshire Superior Court, Hillsborough SS., Southern District.

Kirkland & Ellis, LLP, 2014-2016.
Wrote expert reports and testified at trial for plaintiffs in *North Carolina State Conference of NAACP v. McCrory*, U.S. District Court for the Middle District of North Carolina.

Dechert, LLP, 2014.
Wrote expert report and testified at trial for plaintiffs in *Veasey v. Perry*, U.S. District Court for the Southern District of Texas.

New York City Charter Revision Commission, 2010.
Analyzed the problem of voter participation in New York City and possible solutions for consideration by Commissioners as they prepared ballot referenda to be placed before the voters in 2010.

New York Latino Research and Resources Network at the University of Albany, State University of New York, 2008.
Analyzed survey and other data and wrote report on Latino political participation in New York City and New York State in the 2008 presidential election.

New York Immigration Coalition, New York, New York, 2006.
Provided technical assistance to a three-city exit poll survey project for the 2006 national midterm elections.

Brennan Center for Justice at New York University School of Law, 2004-2005.
Provided expert report on voter fraud and testified as a fact witness in *ACORN, et al. v. Bysiewicz*, U.S. District Court for the District of Connecticut.

Howard Samuels State Management and Policy Center, Graduate School and University Center of CUNY, 2002.
Consulted on survey design for a project on the efficacy of community-based organizations.

Dēmos, New York, New York, 2001 to 2002.
Researched and wrote a study of voter fraud in contemporary American politics.

1199 Child Care Fund, New York, New York, 2000 to 2002.
Prepared demographic data for Fund-eligible union members and their children.

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