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Bruce L. Adelson
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May 14, 2021

Peter Torkelson
Executive Director
Alaska Redistricting Board
Peter.Torkelson@akredist.org

Dear Mr. Torkelson:

We are submitting our proposal in response to the Request for Information (RFI) Voting Rights Consultant for the Alaska Redistricting Board. Federal Compliance Consulting LLC is the responder and will be the prime contractor if awarded the Voting Rights Consultant contract.

Our responses to the RFI follow below in numbered paragraphs matching the RFI's Response Requirements.

1. Voting Rights Act Understanding

As described in this proposal, we have significant experience with the Voting Rights Act of 1965 and the unique knowledge, experience, and expertise to provide requested redistricting consultation and voting rights assistance to the Alaska Redistricting Board for the current redistricting cycle.

Federal Compliance Consulting LLC is this proposal's offeror. If awarded the redistricting contract, Federal Compliance Consulting will be the prime contractor and will work with two expert Voting Rights Act statistical and demographic subcontractors, Dr. Jonathan Katz and Katz Statistical Consulting and Dr. Douglas Johnson and National Demographics Corporation (NDC).

Bruce Adelson, Esq., is Federal Compliance Consulting's CEO and President. Bruce has extensive redistricting and Voting Rights Act experience spanning three redistricting cycles, 2001, 2011, and 2021 as U.S. Department of Justice (DOJ) Voting Section Senior Trial Attorney (2000-2006), Voting Rights Act expert for the Arizona Independent Redistricting Commission (AIRC), redistricting expert and consultant for myriad counties, cities, school districts, and

community college districts (2010-2016), and currently as redistricting legal counsel and expert during the 2021 cycle, including as Voting Rights Act Legal Counsel for a state redistricting commission (final contract pending).

In his DOJ career and post-DOJ redistricting work, Bruce has extensively advised and consulted with state and local governments and the Arizona Independent Redistricting Commission (AIRC) about all aspects of redistricting, including but not limited to complying with the U.S. Constitution and Voting Rights Act Sections 2, 4, 5, and 203, preparing redistricting plans, preparing redistricting reports and presentations, preparing Section 5 submissions to DOJ, meeting with DOJ to discuss redistricting, analyzing data, analyzing election results, conducting racial bloc/racially polarized voting analyses, litigation, and conducting community involvement and outreach in redistricting.

At DOJ during the 2001 redistricting cycle, Bruce was the Team Leader for DOJ's Voting Rights Act (including Section 5) analysis of Arizona's 2002 and 2003 legislative redistricting plans, the Attorney General's Section 5 objection to Arizona's 2002 legislative redistricting plan and requests for additional information, Arizona's 2002 Congressional redistricting plan, New York City's 2003 City Council redistricting plan, Phoenix's 2002 City Council redistricting plan, redistricting plans for counties, parishes, special districts, and municipalities in Texas, Alabama, Arizona, Mississippi, New York, Louisiana, South Carolina, and many other statewide and local voting changes across the United States.

Unlike other consultants, we have the unmatched expertise and experience to understand the importance of community outreach and engagement in redistricting. For example, Bruce advised the Arizona Independent Redistricting Commission on locations for community redistricting meetings around the State of Arizona, including but not limited to on Native American Reservations, about outreach to different groups and communities, and about how to provide language access to limited English proficient communities.

Bruce's outreach advice has included providing in-person and video interpreters and translations for redistricting in such languages as, Spanish, Tagalog, American Sign Language, Vietnamese, Mandarin, Cantonese, Navajo, Hopi, Apache, O'odham, and many more in compliance with the Voting Rights Act, Americans with Disabilities Act, and 1964 Civil Rights Act.

Post DOJ, Bruce has given keynote voting & redistricting training and education presentations to many organizations such as the National Association of State Election Directors, National Conference of State Legislatures, National Association of Counties, International Municipal Lawyers Association, The Arizona League of Cities and Towns, Arizona Independent Redistricting Commission, Arizona State Bar, Arizona Attorney General, Arizona Secretary of State, Maricopa County, Texas District and County Attorneys Association, New Mexico County Clerks Association, Washington State Association of County Auditors, Tri-State (AZ, NM, UT) and Tri-County (Apache, Navajo, Coconino) Native American Language Election Information

Conferences, Gila County's American Indian Voter Outreach Summit, the Navajo Nation, Hopi Tribe, and the Inter-Tribal Council of Nevada.

Bruce's Post-DOJ Redistricting Consultations include:

- Nevada Secretary of State –Comprehensive federal voting and election law consultation, including NVRA, Voting Rights Act, HAVA, and UOCAVA, redistricting, observation of federal primary election polling place practices in several Nevada counties, and best practices recommendations.
- Washington Secretary of State – Voting Rights Act Section 203 minority language requirements, application to redistricting, and coverage for State of Washington and local jurisdictions.
- Arizona Secretary of State – various provisions of the Voting Rights Act, including Section 11(b) voter intimidation, and Sections 5, 2, and 203 for redistricting.
- Arizona Governor and Arizona Department of Economic Security – NVRA Section 7 settlement with DOJ. Bruce conducted an in-house assessment and investigation and assisted Arizona in settlement negotiations with DOJ. The settlement is here: <https://www.justice.gov/crt/agreement-between-united-states-department-justice-and-arizona-department-economic-security>
- State of Arizona
- Gila County, Arizona
- Gila Community College, Arizona
- City of Globe, Arizona
- City of Phoenix, Arizona
- City of Los Angeles, California
- New York City, New York
- Allegan County, Michigan
- Navajo County, Arizona
- Yavapai County, Arizona
- Pinal County, Arizona
- Mohave County, Arizona
- Greenlee County, Arizona
- Graham County, Arizona
- La Paz County, Arizona
- Western Arizona Vocational Education District
- Ford County, Kansas
- Multiple confidential jurisdictions – states, counties, and municipalities

In addition, Bruce has previous Alaska Voting Rights Act experience as the testifying and consulting expert for the State of Alaska in *Nick, et al., v. City of Bethel, et al.*, Case No., 3:07-CV-00098-TMB, (D. Alaska). Bruce also consulted with the State of Alaska Division of Elections during the 2011 cycle concerning compliance with the Voting Rights Act.

During the 2011 redistricting cycle, Bruce was the AIRC's consulting expert in federal litigation challenging the Commission's legislative redistricting plan before a three-judge federal court and on direct appeal to the U.S. Supreme Court. The three-judge court upheld the Commission's redistricting plan and endorsed Bruce's advice to the Commission *Harris v. AIRC*, 993 F.Supp.2d 1042 (D. Ariz., 2014). In April 2016, a unanimous U.S. Supreme Court (136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016)) agreed and upheld the plan's legality 9-0.

We have extensive experience working with state and local governments, redistricting commissions, and elected officials at all levels of government across the United States.

2. Racial Bloc Voting Experience (And See Answer 4 Below)

Bruce Adelson has led and conducted multiple racial bloc voting and election analyses during his DOJ and post-DOJ careers in his role as enforcement attorney, redistricting consultant, expert witness, and AIRC Voting Rights expert.

Bruce Adelson, Dr. Katz, and Dr. Johnson all have extensive racial bloc voting and election analysis experience in their decades of redistricting work.

Dr. Jonathan Katz is the Kay Sugahara Professor of Social Sciences and Statistics at the California Institute of Technology. He received his Bachelor of Science degree from the Massachusetts Institute of Technology in applied mathematics and his Master of Arts and Doctor of Philosophy degrees, both in political science from the University of California, San Diego. He has done post-doctoral work at Harvard University and the Harvard-MIT Data Center. Dr. Katz is an elected fellow of both the American Academy of Arts and Sciences and the Society for Political Methodology.

Dr. Katz has written books and numerous articles published in the leading journals, including:

Elbridge Gerry's Salamander: The Electoral Consequences of the Reapportionment Revolution. (with G. Cox). New York: *Cambridge University Press*. 2002; The Mathematics and Statistics of Voting Power (with A. Gelman and F. Tuerlinckx) *Statistical Science* 17(4): 420–435. 2002; and Constitutions of Exception: The Constitutional Foundations of the Interruption of Executive and Legislative Function (with M. McCubbins) *Journal of Institutional and Theoretical Economics*. 174(1):77–98. 2018.

He is currently the Deputy Editor for Social Sciences of *Science Advances*, the open access journal of the American Association for the Advancement of Science. He previously served as co-editor of *Political Analysis*, the journal of the Society for Political Methodology and he

served on the editorial boards of *Electoral Studies*, *Political Research Quarterly*, and the *American Journal of Political Science*.

Dr. Katz has done extensive research on American elections and on statistical methods for analyzing social science data. Over the past two decades, Dr. Katz testified or consulted in more than 40 elections cases in both state and federal courts for both Democratic and Republican clients involving the Federal Voting Rights Act, the evaluation of voting systems, or the statistical evaluation of electoral data.

Dr. Douglas Johnson and NDC have prepared dozens of databases for polarized voting analysis including but not limited to the following jurisdictions:

1. State of Arizona
2. City of Anaheim, CA
3. City of Compton, CA
4. City of Escondido, CA
5. City of Santa Clarita, CA
6. City of Whittier, CA
7. Santa Clarita Community College District, CA
8. Tulare Health Care District, CA

NDC has served hundreds of local governments since its founding in 1979. While most of NDC's work is in California and Arizona, the firm has performed projects in all regions of the country, serving clients as varied as the States of Mississippi, Arizona, Florida and Illinois; Clark County (Nevada); the California counties of Merced, San Bernardino, and San Diego; the San Diego Unified School District; the City of Oakland; the Arizona cities of Glendale, Mesa, Peoria, Phoenix, and Surprise; and relatively smaller jurisdictions such as the City of Bradbury and Clay Elementary School District.

The company is especially well known for its districting and redistricting work with local governments. NDC has established a reputation as the leading demographic expert on the California Voting Rights Act (CVRA), having performed demographic assessments of potential CVRA liability and/or moves to by-district elections for over 350 jurisdictions. No company has been responsible for addressing the electoral demographic needs of more local governments, as NDC has districted and/or redistricted more than 250 counties, school districts, cities, water districts, and other local jurisdictions.

Nationally recognized as a pioneer in good government districting and redistricting, NDC has unmatched expertise in the issues, questions, and decisions jurisdictions face in any discussion regarding districting, redistricting, the California and Federal Voting Rights Act and related election system choices.

3. Expert witness experience

Expert witness experience for Bruce Adelson includes and but is not limited to:

- *Harris v. Arizona Independent Redistricting Commission*, Case No 14-232, (136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016)). Bruce Adelson was the Voting Rights Act expert for the Arizona Independent Redistricting Commission. He was the consulting expert in litigation challenging the Commission's legislative redistricting plan. A three-judge federal court dismissed plaintiffs' challenge to the plan. (*Harris v. Ariz. Indep. Redistricting Comm'n*, 993 F.Supp.2d 1042 (D. Ariz., 2014)). Mr. Adelson testified by deposition in that case. In April 2016, the U.S. Supreme Court unanimously upheld the plan's legality. In part, the Court held that when a state or local government draws a redistricting plan that keeps population deviations below 10%, the map is presumptively legal when "the population deviations were primarily a result of good-faith efforts to comply with the Voting Rights Act . . . even though partisanship played some role."
- *State v. Linda Jane Minyard and State v. Michael Edwin Minyard*, Maricopa County Superior Court CR 2016-002415-001 and CR 2016-002416-001. State of Arizona prosecuted the Minyards for felony voter fraud and voting in elections in two states. Bruce Adelson was the testifying voting and elections law and Department of Justice expert for the Minyards. The case settled before trial. Defendants pleaded no contest to the lowest possible misdemeanors.
- Bruce was the undisclosed consulting expert for a State in a Voting Rights Act Section 2 vote dilution case where state law provided that a metropolitan charter cannot be adopted unless approved by both a majority of the qualified voters residing in the principal city in the county and a majority of the qualified voters residing outside the principal city in the county. This is referred to as the dual-majority voting requirement. In this case, the principal city has a majority Black population. The U.S. District Court granted summary judgment for the State.
- *Gray et al v. St. Louis City Board of Election Commissioners*, (E.D. Mo., 2016). Bruce Adelson was the consulting expert for two blind voters who sued the St. Louis Board of Election Commissioners. The Court granted a Temporary Restraining Order that directed local election officials "make touch-screen voting machines with audio and all other accessible voting technology available for persons with disabilities during the absentee voting period for the November 8, 2016 election." Recognizing the primacy of federal disability access law and blind voters' preference for touch-screen voting, the Court held that "... if disabled Missourians are denied the use of talking voting machines during the current absentee period, they will suffer irreparable harm in the form of a restriction on their fundamental voting rights."

- Nick, et al., v. City of Bethel, et al., Case No., 3:07-CV-00098-TMB, (D. Alaska). In 2008, Defendant State of Alaska designated Bruce Adelson as its testifying and consulting expert in this case where plaintiffs alleged violations of the Voting Rights Act's Section 203 minority language requirements for Alaska Native languages. Bruce assisted the State with enhancing its Section 203 program. The case settled before trial.
- Hall v. State of Louisiana et al., 973 F.Supp.2d. 675 (M.D. La., 2013). Defendant State of Louisiana retained Bruce Adelson as an expert in redistricting and the Voting Rights Act. Mr. Adelson prepared an expert report. This case alleged Voting Rights Act Section 2 discrimination in how judges are elected to the Baton Rouge City Court. Trial in this case occurred in November 2014. Mr. Adelson testified at trial. In 2015, the Court found for the State of Louisiana, ruling in a case of first impression that election results from one election cycle are insufficient to prove Voting Rights Act Section 2 vote dilution. Bruce Adelson was the consulting expert for the State on appeal. In 2018, the U.S. Court of Appeals for the Fifth Circuit affirmed the trial court's decision.
- Alissa Juech v. Children's Hospital of Wisconsin, 353 F.Supp.3d 773 (E.D. Wis. 2018). Children's Hospital's counsel retained Bruce Adelson as the testifying ADA expert. A deaf patient and her husband sued Children's Hospital alleging ADA disability discrimination by the hospital and staff. Bruce prepared an expert report. In 2018, the Court granted Children's Hospital's motion for summary judgment and dismissed the case.
- Rose et al. v. Wayne County Airport Authority, 210 F.Supp.3d 870 (E.D. Mich. 2016) Bruce Adelson was the testifying Americans with Disabilities Act expert for the Wayne County Airport Authority and Detroit Metropolitan Airport. The case involved allegations of ADA and ADA Standards of Accessible Design (ADAAG) disability discrimination in the airport's main terminal, transit stops, and parking areas. In 2016, the court dismissed the lawsuit and the discrimination allegations against the airport, confirming the accuracy of Mr. Adelson's ADA expert opinions and ADAAG assessments. In 2017, the U.S. Court of Appeals for the Sixth Circuit affirmed and upheld the trial court's dismissal of this case.

Expert witness experience for Dr. Katz includes and but is not limited to:

- Rep. Antonio Maestas et al. v. Diana Duran (2012, New Mexico State District Court)
- Rene Romo, et al. v. Ken Detzner, and Pam Bondi (2013, Florida Circuit Court)
- Diego v. City of Whittier (2014, Superior Court of the State of California, County of Los Angeles)

- *Jim Soliz, et al. v. Santa Clarita Community College District* (2014, Superior Court of the State of California, County of Los Angeles)
- *Bethune-Hill, et al. v. Virginia State Board of Elections, et al.* (2015 and 2017, U.S. District Court for Eastern District of Virginia)
- *Luna, et al. v. County of Kern, et al.* (2017, U.S. District Court for Eastern District of California)
- *Bruni v. Huges* (2020, U.S. District Court for the Southern District of Texas)
- *Miller v. Huges* (2020, U.S. District Court for the Western District of Texas)
- *Casey v. Garner* (2020, U.S. District Court for the District of New Hampshire)

Expert witness experience for Dr. Johnson includes and but is not limited to:

- Expert witness declaration for the City of Redondo Beach, California, in *City of Redondo Beach vs State of California*, Los Angeles County Superior Court Case Case No. BS172218 litigation regarding the California Voter Participation Act (currently pending).
- Expert witness declaration for West Contra Costa Unified School District in *Ruiz-Lozito vs West Contra Costa Unified School District* litigation under the California Voting Rights Act, Contra Costa Superior Court Case Number C18-00570 (currently pending).
- Expert witness declaration, deposition and testimony for Kern County, California, in *Luna v County of Kern* litigation under the Federal Voting Rights Act.
- Expert witness declaration and testimony for North Carolina in *Covington v State of North Carolina* litigation under the Federal Voting Rights Act.
- Expert witness declaration for City of Fullerton in *Jamarillo v City of Fullerton* litigation under the California Voting Rights Act.
- Expert witness declaration for City of Whittier in *Diego v City of Whittier* litigation under the California Voting Rights Act.
- Expert witness declaration and deposition for plaintiff in *Harris vs Arizona Independent Redistricting Commission* litigation.

- Expert witness declaration and deposition for Santa Clarita Community College District in *Solis v Santa Clarita Community College District* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Highland in *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Palmdale in *Jauregui et al vs City of Palmdale* and *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Testified as 30(b)(6) “Most Knowledgeable” witness for Arizona Independent Redistricting Commission in *Arizona Minority Coalition v Arizona Independent Redistricting Commission*, including seven days of direct testimony and cross-examination in the state court case. Also testified in the related federal court case.
- Consulting expert for the following jurisdictions on their California Voting Rights Act-related cases, including preparing analysis and assisting with witness and attorney preparation: Cities of Anaheim, Compton, Modesto, Poway, Santa Clara, Santa Clarita, and Whittier; Santa Clarita Community College District; and Tulare Health Care District.

4. Statistical analytical methodology

The key statistical analysis needed to comply with the Federal Voting Rights is to estimate the voting behavior of various racial and/or ethnic groups from aggregate election results to see if there is racially polarized voting. In the statistical literature this is referred to as ecological inference.

A common starting point in the process of estimating the share of each racial group voting for a specific candidate is to consider only homogeneous precincts. That is, one could examine the election results from precincts that are closest to racially homogeneous in character. For example, if a precinct were completely racially homogeneous, say with a population that was 100% Black, then one would know what fraction of Black people voted for a given candidate in the precincts: it is just the share the given candidate got in the district. While this might be a useful starting point, as a statistical procedure, it is problematic since it throws out most of the data unless most of the precincts are homogeneous.

However, Dr. Katz can use the intuition from the homogeneous precincts to place bounds on the level of support each group gives a candidate. Consider the following equation, which is true by

definition, that relates the vote share of given candidate to the voting behavior of members of two groups B and W (this can be extended to arbitrary numbers of groups):

$$V_i = \lambda_i^B X_i + \lambda_i^W (1 - X_i)$$

where V_i is the share of the vote a given candidate received in district i , X_i is the fraction of Blacks in the district and therefore $(1 - X_i)$ is the fraction of White (or more correctly non-Blacks) voters, assuming for the moment that there are only two groups in the electorate. λ_i^B is the fraction of African-Americans voting for the given candidate and similarly λ_i^W is the fraction of Whites voting for the given candidate.

In other words, the equation states the fact that the total vote share for a candidate must equal the proportion of Black voters who support them multiplied by the proportion of the electorate that is Black plus the proportion of the White voters who support the candidate multiplied by the proportion of the electorate which is White. In the case of only two groups e.g., Blacks and Whites and only two candidates, then racially polarized voting occurs when $\lambda_i^B \neq \lambda_i^W$. The larger the difference between support levels, the greater the level of polarized voting. Duncan and Davis (1953) fully developed the method of bounds outlined above to analyze ecological data.

As noted, the problem with the method of bounds is that it ignores almost all of the election data. An alternative approach that uses all of the precincts was developed by Goodman (1959). It is referred to in the literature as ecological regression or Goodman's regression.

Like the method of bounds, it is based on the identity that the total vote for the candidate must equal the sum of the fraction of each group's support of the candidate times their fraction of precinct's population.

It identifies the estimate by making the strong assumption that voting behavior does not vary across individuals or precincts. That is, the fraction of support for a given candidate for both Whites and Blacks (and other groups in our analysis) was the same across all precincts and individuals within the precinct. Then Goodman (1959) noted that we could estimate these fractions by choosing the best fitting line to the precinct-level data. This is just a standard linear regression that is used thorough out statistics and the qualitative social sciences.

However, there is no free lunch, and ecological regression allows one to identify the estimate across all districts and in any data set by making the heroic assumption of no variability of voting behavior across precincts and individuals, which is usually referred to as the *constancy assumption*. In fact, Goodman himself was extremely cautious in recommending use of ecological regression to infer individual relationships given this required assumption. He stressed that only "under very special circumstances" should ecological regression be relied upon to produce reasonable estimates (Goodman 1953: 664).

King (1997) has developed an alternative approach called Ecological Inference or EI that we will use to estimate the voting behavior of different racial or ethnic groups in elections in Alaska to determine whether voting is racially polarized. While the technical details are complex, its advantage is that it uses all available information to generate more accurate estimates of voting behavior from aggregate data. EI is basically a way to combine the regression approach of Goodman (1959) with the bounds from Duncan and Davis (1953). Further, it allows the estimates to vary (systematically) across precincts.

5. Current or past clients similar to the Redistricting Board

Federal Compliance Consulting and Bruce Adelson:

Pending Final Contract 2021: Voting Rights Act Legal Counsel for a state independent redistricting commission.

Arizona Independent Redistricting Commission: 2010 - 2016: Bruce was the AIRC's Voting Rights Act expert. He worked with the AIRC, general counsel, commissioners, and staff on all aspects of AIRC legislative and congressional redistricting including map creation and analysis, Voting Rights Act compliance, election analysis, retrogression and racial bloc/racially polarized voting analyses, *Thornburg v. Gingles* analyses, public outreach and participation, communications with DOJ, and preparation of AIRC's Section 5 submission to DOJ. Bruce helped AIRC obtain Voting Rights Act Section 5 preclearance on first USDOJ submission for the first time in over 20 years.

He was the consulting expert in litigation challenging the Commission's legislative redistricting plan. A three-judge federal court dismissed plaintiffs' challenge to the plan. *Harris v. Ariz. Indep. Redistricting Comm'n*, 993 F.Supp.2d 1042 (D. Ariz., 2014). Mr. Adelson testified by deposition in that case. In April 2016, the U.S. Supreme Court ((136 S. Ct. 1301, 194 L. Ed. 2d 497 (2016)) unanimously upheld the plan's legality 9-0. In part, the Court held that when a state or local government draws a redistricting plan that keeps population deviations below 10%, the map is presumptively legal when "the population deviations were primarily a result of good-faith efforts to comply with the Voting Rights Act . . . even though partisanship played some role."

2011 Contacts:

Colleen Mathis, AIRC Chairwoman, 2011-2021
520-444-9497
Mathis_colleen@hotmail.com

Ray Bladine, AIRC Executive Director, 2011-2021
602-740-8894
rbladine@gmail.com

During the 2011 redistricting cycle, Bruce was the redistricting consultant and legal expert for many jurisdictions. Most did not employ redistricting bodies similar to the Alaska Redistricting Board.

Most of Bruce's 2011 redistricting contacts with his 2011 clients are either deceased or no longer employed by their jurisdictions.

Two jurisdictions that Bruce consulted with in 2011, Gila and Navajo Counties, Arizona, used commissions to formulate district maps. For both counties, Bruce provided comprehensive redistricting consulting for Board of Supervisors, Community College, and Justice of the Peace redistricting including Voting Rights Act compliance, map review and analysis, retrogression, racial bloc/racially polarized voting, and *Thornburg v. Gingles* analyses, community participation and outreach, working with elected officials, conducting public redistricting presentations, and mapping analysis.

Gila County
1400 E. Ash Street
Globe, Arizona 85501
(928) 402-8516

2011 Contacts: No longer with the County or deceased

Navajo County is a current redistricting client.

Navajo County
Jason S. Moore
Deputy County Attorney
Navajo County Government Center
100 East Code Talkers Drive
P.O. Box 668
Holbrook, Arizona 86025
(928) 524-4000

Additional redistricting references:

Deborah Herbert
Mohave County Deputy County Attorney
700 West Beale Street, Kingman, AZ 86401
928-753-0770, ext. 4274
Deborah.Herbert@MohaveCounty.AZ

Bruce Adelson consulted with Mohave County during the 2011 redistricting cycle and prepared the County's redistricting plans for the Board of Supervisors, justice of the peace districts, and

community college districts, and Section 5 submission. The U.S. Department of Justice precleared all of the County's redistricting plans on first submission.

Gilda R. Daniels
Associate Professor of Law, University of Baltimore School of Law,
John and Frances Angelos Law Center, Room 1012
1420 N. Charles Street, Baltimore, MD 21201
410.837.4607
gdaniels@ubalt.edu

Professor Daniels was the Deputy Chief, Voting Section, U.S. Department of Justice, during Bruce's Voting Section career. They worked together on myriad Justice Department investigations and cases. Professor Daniels and Bruce consulted on numerous redistricting consultations during the 2011 cycle, including but not limited to Arizona's Congressional and legislative redistricting.

Redistricting clients similar to the Alaska Redistricting Board for subcontractor Katz Statistical Consulting and Dr. Katz:

E. Mark Braden mbraden@bakerlaw.com (202) 861-1504	Katherine L. McKnight kmcknight@bakerlaw.com (202) 861-1618
Baker & Hostetler LLP	

Dr. Katz worked on numerous election law cases with Mr. Braden and Ms. McKnight over the last twenty years involving redistricting and election law more generally. Dr. Katz conducted statistical analysis of racially polarized voting as well as partisan bias in proposed redistricting plans.

Marguerite Mary Leoni mleoni@nmgovlaw.com (415) 389-6800	Chris Skinnell cskinnell@nmgovlaw.com (415) 389-6800
Nielsen, Merksamer, Parrinello, Gross & Leoni LLP	

Dr. Katz worked on numerous election law cases with Ms. Leoni and Mr. Skinnell over the last twenty years involving both the California and Federal Voting Rights Acts and election law more generally. Dr. Katz conducted statistical analysis of racially polarized voting as well as other aspects of election data.

Kimberly Hall Barlow
khb@jones-mayer.com
(714) 446-1400
Jones & Mayer

Dr. Katz has done statistical analysis of racially polarized voting of several California cities over the last seven years to help Ms. Barlow advise them on how to respond to possible lawsuits under the California Voting Rights Act.

Redistricting clients similar to the Alaska Redistricting Board for subcontractor National Demographics Corporation and Dr. Johnson:

1. State of Arizona
2001 contact and reference: Dr. Lisa Handley: President, Frontier International Consulting, lrhandley@aol.com, 11821 Milbern Drive, Potomac MD 20854. 301-765-5024
2. City of Anaheim, CA
3. City of Compton, CA
4. City of Escondido, CA
5. City of Santa Clarita, CA
6. City of Whittier, CA
7. Santa Clarita Community College District, CA
8. Tulare Health Care District, CA

Contact and reference for Numbers 2-8: Marguerite Leoni, Esq.,
MLEoni@nmgovlaw.com, 2350 Kerner Boulevard, Suite 250, San Rafael, CA 94901.
(415) 389-6800.

6. Staff redistricting/reapportionment expertise

Federal Compliance Consulting staff: Bruce Adelson – expertise detailed in proposal

Katz Statistical Consulting staff: Dr. Katz – expertise detailed in proposal

National Demographics Corporation staff: Dr. Johnson (expertise detailed in proposal) and:

Dr. Justin Levitt, Vice-President, National Demographics Corporation, 2003– present.
(Ph.D., Political Science, University of California at San Diego, dissertation on geographic definitions of communities of interest in redistricting).

Dr. Daniel Phillips, NDC Consultant since 2020. Redistricting experience: Santa Barbara County (CA) Citizens Independent Redistricting Commission, Ph.D., Geography,

University of California at Santa Barbara, dissertation on communities of interest in redistricting.

7. Company ownership

Bruce Adelson is CEO and President of Federal Compliance Consulting LLC, based in Potomac, Maryland. Bruce and Federal Compliance Consulting have been in business since 2006. Federal Compliance Consulting LLC is wholly owned by Bruce Adelson. We have no branch or affiliate offices. Bruce Adelson has practiced law since 1983. Bruce has 21 years of redistricting enforcement, consulting, and litigation experience, both in private practice and with DOJ.

8. Additional acquisitions post-award

I do not anticipate acquiring additional office space, equipment, personnel, or any other items specific to this project.

9. Additional distinct and substantive qualifications

Bruce Adelson, Dr. Johnson, and Dr. Katz have unmatched redistricting expertise and experience. From a unique understanding of how DOJ and the federal courts view redistricting to previous experience consulting for the State of Alaska to vast experience with creating statistical models, election data bases, and conducting Voting Rights Act analyses, we look forward to using our expertise to benefit the Alaska Redistricting Board and the State of Alaska.

Here are some additional aspects of our expertise and recognition.

During Bruce's DOJ career, Bruce reviewed and analyzed dozens of statewide and local redistricting plans throughout the United States for Voting Rights Act compliance. The Attorney General of the United States twice recognized Bruce's Voting Rights Act work, including redistricting, with "Special Achievement" Awards. In private practice, Bruce has a 100% perfect record of obtaining Voting Rights Act Section 5 preclearance on first submission for his clients without any DOJ requests for additional information or other DOJ imposed delays. Bruce's U.S. Supreme Court success in *Harris v. AIRC* reinforces and exemplifies his nationally recognized redistricting expertise.

Dr. Katz has received multiple honors and awards including as the Elected Fellow of the American Academy of Arts and Sciences, 2011 and Elected Inaugural Fellow of the Society for Political Methodology, 2008. He is a prolific author with myriad scholarly works about redistricting, such as "How to Evaluate Measures of Partisan Fairness for Legislative Redistricting" (with G. King and E. Rosenblatt). *American Political Science Review*. 114(1): 164–178. 2020. The forthcoming publication of Dr. Katz's newest work, "The Essential Role of Statistical Inference in Evaluating Electoral Systems" (with G. King and E. Rosenblatt). *Political Analysis*, is especially pertinent for the current redistricting cycle.

Dr. Johnson graduated Cum Laude and Phi Beta Kappa from Claremont McKenna College, with the Philip Roland Prize for Excellence in Public Policy. He is the author of multiple articles about redistricting, such as “Quiet Revolution in California Local Government Gains Momentum,” *Rose Institute of State and Local Government*, 2016 and is a featured redistricting speaker for national and statewide organizations including the National Conference of State Legislatures, California League of Cities, Pomona College and Claremont McKenna College. He is a regular source for redistricting expertise for such media as CNN, Los Angeles PBS, Fox, and in the 2010 documentary “Gerrymandering.”

Costs and Expenses

Our hourly rates are as follows:

Bruce Adelson, Esq., prime contractor - \$425.00

Subcontractor hourly rates:

Dr. Jonathan Katz - \$350.00

National Demographic Corporation:

Dr. Douglas Johnson - \$300.00

Dr. Justin Levitt - \$250.00

Senior Consultant - \$200.00

Consultant - \$150.00

Analyst / Clerical - \$50.00

Plus travel expenses

References

For your convenience, we provide below the references listed above in this proposal.

Bruce Adelson:

Colleen Mathis, AIRC Chairwoman, 2011-2021

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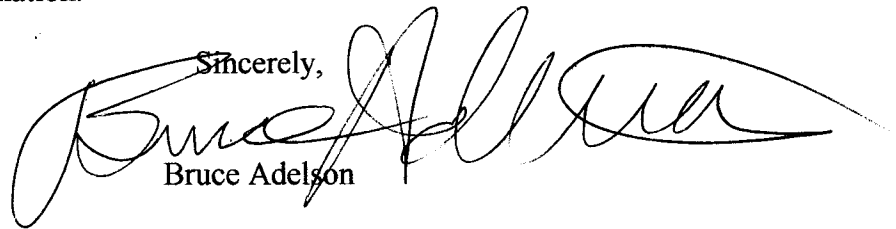
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Thank you for your consideration and your interest in our expertise. Please let us know if you require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Adelson", written in a cursive style. The signature is positioned above the printed name "Bruce Adelson".

Bruce Adelson