No. A25-

IN THE

Supreme Court of the United States

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NICOLE MALLIOTAKIS, *et al.*,

Applicants,

v.

MICHAEL WILLIAMS, *et al.*,

Respondents.

ON APPLICATION FOR STAY TO THE COURT OF APPEALS OF THE STATE OF NEW YORK
TO THE HONORABLE SONIA SOTOMAYOR, ASSOCIATE JUSTICE OF THE SUPREME COURT
OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE SECOND CIRCUIT

APPENDIX TO EMERGENCY APPLICATION FOR STAY
VOLUME IV OF X (PAGES 1201a - 1600a)

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1   D. S T E P H E N V O S S,

2   called by the Respondents, after being duly sworn,

3   testified as follows:

4   THE COURT OFFICER: Have a seat. Would you

5   state your first and last name, for the record and your

6   address.

7   THE WITNESS: Professional name is initial D.

8   Stephen with a P-H, Voss, V as in Victor or violin if

9   you prefer, O S S.

10   THE COURT OFFICER: Address?

11   THE WITNESS: 162 Goodrich, one word, Avenue

12   Lexington, Kentucky.

13   THE COURT OFFICER: Thank you.

14   THE COURT: Welcome.

15   MR. BRAUNSTEIN: For the record, Andrew

16   Braunstein, Troutman Pepper Locke for the Intervenor

17   Respondents. Good morning, your Honor. Good morning,

18   Dr. Voss.

19   Your Honor, in the interest of trying to save

20   some time before I get started, pursuant to the

21   stipulation the parties filed, the parties stipulated to

22   tender Dr. Voss as an expert on ecological inference and

23   redistricting.

24   THE COURT: Thank you.

25   MR. BRAUNSTEIN: The parties have also

590

1   stipulated to admit Dr. Voss's corrected report as

2   Exhibit Intervenor Respondent's Exhibit 3.

3   May I please hand Dr. Voss a copy of those

4   exhibits?

5   THE COURT: The clerk will take it and hand it

6   up.

7   MR. BRAUNSTEIN: Thank you.

8   (Handed to the witness.)

9   DIRECT EXAMINATION

10   BY MR. BRAUNSTEIN:

11   Q.   Dr. Voss, I know we're trying to move quickly

12   today. I want to ask you some very brief questions about

13   your background.

14   Can you please tell us where you are currently

15   employed?

16   A.   Yes, I'm an associate professor at the University

17   of Kentucky in the City of Lexington.

18   Q.   And can you tell us about the courses that you

19   teach at the university?

20   A.   Sure. I teach courses across the board from

21   freshman intro to advanced graduate courses. Some of them

22   are on elections. I teach both undergraduate and graduate

23   elections course. I taught all the courses in our graduate

24   quantitative analysis sequence or what we call political

25   methodology and a handful of other American politics topics.

1   Q.   Do any of those courses concern racial or ethnic

2 politics?

3   A.   Oh, sure. Any topic in American politics if you

4 are ignoring race you are probably not handling adequately.

5 The only course I teach that is really focused on race, I

6 worked with the African American studies program at UK to

7 create a race ethnicity and politics course cross-listed

8 between them. I taught that a couple of times before I

9 passed it along to people who were excited to teach it so.

10   Q.   Understood. Thank you.

11   In addition to your teaching duties, do you have

12 any other roles at the University of Kentucky?

13   A.   In addition to my teaching and research duties,

14 yes, I'm an internship director, so I coordinate with

15 democrats and republicans in the state legislature to funnel

16 students to get some real life legislative experience.

17   I'm faculty advisor for a few student groups.

18 My longest running gig is I'm faculty advisor for the

19 college democrats. Later on I added the college

20 republicans, Phi Alpha Delta, the pre-law fraternity, and

21 I'm also sort of the face of the Department of Publicity.

22 I've emerged a role as a nonpartisan political commentator

23 in Kentucky. Political analyst for Spectrum 1 News. I am

24 on TV, quoted, on talk radio all the time.

25   Q.   Sounds like you are very busy. Thank you for

1   taking the time to be here.

2   Have you ever published work using ecological

3   inference?

4   A.   Sure. My dissertation at Harvard University was

5   advised -- my primary advisor was Gary King who is primarily

6   responsible for a lot of what we're going to be talking

7   about today. Also had another pioneer in ecological

8   inference on the committee. So my dissertation had some

9   ecological inference chapters that later went through peer

10   review, got published. And I've tried to ecological

11   inference since then when I could. My most recent

12   publication was last year, but as suspicion has grown about

13   ecological inference, partly for some of the problems we'll

14   discuss today, I kind of moved away from it. It is hard to

15   get ecological inference through peer review.

16   Q.   And Dr. Voss, ever been retained as an expert

17   witness before?

18   A.   Sure.

19   Q.   Approximately, how many times?

20   A.   Under ten if you are only talking political or

21   elections related things. But I've also been an expert

22   witness or consultant in things that had nothing to do with

23   elections.

24   Q.   And how many of those cases in which you've been

25   retained as expert have you been asked to perform an

1   ecological inference analysis?

2   A.   Of the elections related I would say half. I've

3   done other things in some of the cases.

4   Q.   Thank you.

5   Dr. Voss, you've been retained as expert in this

6   matter?

7   A.   Yes.

8   Q.   By which party?

9   A.   By the intervenors, Troutman, I'm forgetting the

10   name, Pepper and Locke.

11   Q.   There is a lot of us.

12   You're being paid for your services?

13   A.   Eventually.

14   Q.   We'll discuss that after.

15   Has any part of your soon to be received

16   compensation affected your conclusions, in this case?

17   A.   Absolutely not.

18   Q.   And Dr. Voss, did you prepare any written reports

19   in connection with your analysis, in this case?

20   A.   I did. Either one or two depending how you count.

21   There was a single error that I, to which I was

22   alerted that I had to fix, which was originally the table

23   that was copied in as Table 3 was Table 1 again. And the

24   corrected one has the correct Table 3.

25   Let me note though the analysis always was

1 about the right Table 3 and the code that I turned over for

2 Dr. Palmer to scrutinize was for the correct analysis. It

3 is just the clerical error that got copied into that box in

4 the first draft.

5   Q.   Understood. Thank you for explaining that.

6   Would you recognize the corrected report if it were

7 shown to you today?

8   A.   I believe so.

9   Q.   And would you take a look at that and let me know

10 if that is your corrected report?

11   A.   Yes, it seems to be.

12   Q.   Thank you.

13   Dr. Voss, can you please tell us what the

14 intervenor respondents asked you to do as an expert, in this

15 case?

16   A.   Well, my limit changed a little bit over time. The

17 main thing I was asked to do was scrutinize the ecological

18 inferences, the estimates submitted by Dr. Palmer to discuss

19 the extent to which the methods he chose I thought were not

20 the best ones, or to phrase it colloquially, when he

21 deviated from best scientific practices, and finally, to the

22 extent I could, to give lay people some sense of what the

23 consequences of his choices were.

24   I would like to stress what I was not asked to

25 do. I was not asked to produce authoritative or definitive

1   ecological inferences of my own the way I would do them.

2   Even as I tweak Dr. Palmer's method, it is still his method.

3   It is not how I would have gone about this. This is to

4   illustrate what happens when you change certain features of

5   the decisions he made.

6   The second thing I was not asked to do is make

7   judgments about racially polarized voting. As we heard from

8   prior testimony, that is not just a scientific judgment,

9   that is also contaminated by legal judgments. If you ask me

10   as a scientist does this group vote cohesively, I need to

11   know what is cohesive before I can tell you whether they do

12   or what the probability they do. If you ask me, are these

13   voters polarized, need to know how far apart is polarization

14   before I can say yes or no, or the probability is yes or no,

15   and unless you tell me scientifically what usually defeated

16   means, as a scientist I can't answer that.

17   Q.   Understood. Thank you.

18   Can you tell us about the analysis that you

19   performed to verify the results in Dr. Palmer's report?

20   A.   Initially, I literally ran Dr. Palmer's software

21   with Dr. Palmer's code and Dr. Palmer's data. Afterward, as

22   I said I made tweaks trying to stay as much as possible

23   within his universe, within his approach, just to illustrate

24   what the effects of those changes were.

25   Q.   And did you use the same programming language and

1   ecological inference packaged as Dr. Palmer?

2   A.   Correct. Yes, I did.

3   Q.   Dr. Voss, can you summarize in general terms the

4   opinions that you offer in your report?

5   A.   Right. So first I argued that the estimates that

6   Dr. Palmer provided were inaccurate and not reliable based

7   on the method and data he used.

8   Second, that when he offered those results

9   they were done with a higher level of confidence and a sort

10 of false sense of precision then really were warranted, and

11 finally I think by the time I was done, I made a pretty good

12 case that his results are wrong. That he is overestimating

13 cohesion among some of the groups in the electorate and

14 overestimating racial polarization compared to what is

15 defensible.

16   Q.   Thank you.

17   Dr. Voss, before we get into those three issues,

18 you mentioned you used ecological inference in this case and

19 in other matters on which you worked on.

20   Can you tell us more in terms that we can all

21 hopefully understand what ecological inference is?

22   A.   Sure. That is probably the hardest question you

23 are going to ask me this hour. I don't think any of us want

24 this to turn into a statics seminar. But there is certain

25 intuitions what is going on with ecological inference that I

1   think need to be understood for everything else to make

2   sense.

3   Dr. Palmer told you how it is used, why it is

4   used, which is to fill in the holes created by the secret

5   balance lot. We don't know how Blacks voted. We don't know

6   in New York how many African Americans turned out, and so on

7   with the other groups.

8   So let's start with what we know about these

9   precincts.

10   THE COURT: When you say that though, I mean,

11   the census tracts track race. The election districts

12   are based on the census tracts, so you can look at a

13   election district and determine the percentage of race

14   and see how that turnout number was and what the outcome

15   was and draw a conclusion that includes race.

16   THE WITNESS: Right. That is right. That is

17   not wrong. In essence I think if I understood your

18   description is what is ecological inference will try to

19   do, okay.

20   Let's take a given election where we only have

21   two candidates, democrat and republican. The output,

22   the behavior we know is just how republican and

23   democratic votes bounce up and down from precinct to

24   precinct. That is our information.

25   THE COURT: Well, in New York it is more than

1   just democrat and republican, right. It might be

2   working families party, it might be third parties as

3   well.

4   THE WITNESS: Yeah, sometimes it is two,

5   sometimes it is more. It is not clear having those

6   other parties makes this easier though.

7   THE COURT: No argument.

8   THE WITNESS: So this is what you know, the

9   bounce up and down of the vote for the democrat and

10   republican relative to how many people there are, okay.

11   And from just that movement, ecological inference is

12   going to try to figure out the rate at which those White

13   citizens showed up to vote and of the ones who did,

14   which share picked the democrat. And it is going to try

15   to figure out the rate at which African Americans showed

16   up to vote and the rate of the ones that picked the

17   democrat. Two numbers for Hispanic. Two numbers for

18   Asians. Two numbers for everybody else.

19   If it sounds like you are trying to squeeze

20   milk from a stone, getting so much from so little, that

21   would be a fair assessment.

22   Now, how does ecological inference try to work

23   the magic of getting estimates of what all those groups

24   are doing, but whether they turn out and how they vote

25   when they turn out. It is more or less, every method of

1   ecological inference more or less assumes that people in

2   those groups behalf the same way everywhere. Aside from

3   a bit of random noise, aside from quirks from place to

4   place.

5   So there is some rate at which Whites want to

6   turn out to vote. That is going to be true regardless

7   of the type of community they live in, the type of

8   place, what their socioeconomic status, and so on.

9   Blacks turn out the same rate. Hispanic turn out the

10   same rate everywhere, more or less.

11   It then will assume the same thing, that of

12   those who turn out, they are going to be, all Hispanic

13   voters are going to be equally likely to vote for the

14   democrat regardless of the type of place where they

15   live, what their socioeconomic status is and the like.

16   Because the assumption is most of what varies

17   from precinct to precinct in terms of outcome is the

18   composition, who lives there, what their race is and

19   their ethnicity is. I'm going to use the term

20   compositional effects for that.

21   Now, what throws ecological inference off is if

22   it is not true that people are the same way everywhere.

23   If, in fact, White voters, White citizens in higher

24   minority areas are less likely to turn out to vote,

25   which a lot of research suggests they are less likely to

1   turn out to vote. That can blows your ecological

2   inference results.

3   THE COURT: In this particular case when we are

4   looking at dilution, don't we want to ask the questions

5   why they don't turn out? What are those reasons? And

6   didn't the prior expert witness testify to those

7   factors; law enforcement, education, opportunity to

8   employment, et cetera, can you speak to that?

9   THE WITNESS: Well, you are preaching to the

10   choir. The content of politics to a political scientist

11   is what we like to talk about.

12   In terms of estimating how much, how high the

13   turnout was among these groups or which way they voted,

14   insights you have about why turnout might be higher or

15   lower or why the support for the republican might be

16   higher or lower would certainly make ecological

17   inferences better.

18   For example, at one point you asked what is

19   going on in the 2017 mayoral election. The real life

20   what is going on in this one contest. My opinion, if

21   you are doing this right you would know that and you

22   would take it into account when conducted the ecological

23   inferences. I would know, for example, well the

24   republican subset of this, the city, and here is where

25   she represented she is probably doing better with Black

1   and Hispanic voters there, because she served some of

2   them then she is doing just as a generic republican

3   elsewhere in the city where they don't have the same

4   relation. You want to take into account the nuance, the

5   real life that you know about these places to get better

6   ecological inferences, absolutely.

7   But if we don't incorporate that outside

8   information and we are just run bulk ecological

9   inferences in the simple result, you are not getting

10   that nuance from case to case.

11   MR. BRAUNSTEIN: Thank you, Dr. Voss. Thank

12   you, your Honor.

13   Q.   So turning back --

14   A.   I didn't quite finish the contextual effects.

15   Insofar as you are getting these differences

16   that Hispanics who live in primary White areas have

17   different partisan preferences from Hispanics who lived in

18   overwhelming Hispanic or Black areas, that will often throw

19   off ecological inference. When your results are wrong

20   because you ignored those contextual effects, you are having

21   biased results. The term for that is aggregation bias,

22   because it is bias caused by how we grouped or aggregated

23   people.

24   Sometimes aggregation bias can be so serious

25   you reach exactly the wrong conclusion. And sometimes we'll

1   call that an ecological fallacy. So if you ignore

2   aggregation bias you can get very wrong estimates.

3   Q.   Thank you.

4   Were there warning signs you identified that led

5   you to investigate in the first place whether there might

6   be some issues with Dr. Palmer's analysis that might be

7   resulting in some of these fallacies you are describing?

8   A.   Well, part of it are just the inputs. My

9   experience, there is almost always -- people aren't the same

10   everywhere and there are generally differences in how

11   Hispanics behave from place to place and the like. When I

12   didn't see anything to deal with aggregation bias, that was

13   a red flag. But then also using my knowledge of practical

14   politics, right. We've all seen extensive coverage of the

15   Hispanic vote shifted republican.

16   MS. WITTSTEIN: Objection, your Honor.

17   Hearsay on general news reports.

18   THE COURT: Sustained.

19   A.   I had a prior expectation that the Hispanic vote

20   was lower for democrats than the Black vote. I then checked

21   polling results statewide to see if in general in New York

22   State the Hispanic vote was as democratic as the Black vote.

23   It was not. It was significantly lower.

24   So again, to the extent I, as a someone watches

25   elections, was trying to decide if his results seemed

1   plausible, my gut told me probably not.

2   Q.   Thank you.

3   And I believe Dr. Palmer suggested in his report

4   that accounting for the aggregation bias you are describing

5   here wouldn't be necessary in a place like New York City.

6   Do you agree with that?

7   A.   No. Um, one thing that Dr. Palmer and I both kind

8   of danced around is there are circumstances if you have very

9   good data where this aggregation bias, these contextual

10   effects can be taken care of automatically.

11   What am I talking about very good data? I've

12   done this sort of analysis in the deep south. They used to

13   have to go to Title V clearance, very good election data.

14   They maybe able to tell you breakdowns by race of who turned

15   out. So you are only having to estimate vote choice.

16   Some of these places in the deep south and also

17   in certain hyper-segregated midwestern cities, Blacks and

18   Whites and even Hispanics are separated enough that you got

19   really good information about what Blacks are doing versus

20   Hispanics versus Whites.

21   In a place like New York City where the

22   Hispanic vote is only moderately segregated, ecological

23   inference is going to have a much harder time getting good

24   results, and you need more information.

25   You've also got the problem of, Dr. Palmer

1   talked about urban precincts versus rural precincts. Having

2   very large population urban precincts makes this harder, not

3   easier. I'm not sure I fully understood what you were

4   saying. In general, my experience as city districts can be

5   tough if they are not segregated because they have a lot of

6   people in them and you are trying to parse, they also have

7   more diversity, more groups that you are trying to estimate

8   what they are doing. Deep south, once you are looking at

9   the Black and White vote that might be all you need for an

10   election case.

11   Then finally, when I looked at the confidence

12   intervals in Dr. Palmer's analysis, especially for Asians,

13   his results were telling him that the Asian vote might be

14   50/50, but it could be as low as in the 30s, could be as

15   high as the 60s. That is a sign you need more information.

16   (Transcript continues on the next page.)

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1 DIRECT EXAMINATION BY

2 BY MR. BRAUNSTEIN:

3   Q.   And so how did you go about accounting for the

4 aggregation bias that you suspected might be impacting

5 Dr. Palmer's results?

6   A.   Right. Well, given time, if I'd been doing this

7 myself, rather than trying to stick to his universe, I would

8 have done something more sophisticated than this. But I wanted

9 something simple, so I can tell you how I deviated from his

10 method.

11   So all I did is allow what's called a covariant, one

12 covariant, allow for the possibility that the turnout among

13 groups depends on how large the minority population is in their

14 precinct; allow for the possibility that how Hispanics vote

15 depends on whether they're in a very White place, or a place

16 with a very large minority population.

17   I allowed the model to adjust for that possibility, for

18 that contextual effect, for that that aggregation bias.

19   Q.   In your experience, is using those covariants to adjust

20 for potential aggregation bias a standard practice?

21   A.   In the peer-reviewed research I know, yes. I think all

22 or at least almost all of my publications had to deal with

23 aggregation bias in the data. Dr. Claudine Gay, who launched a

24 very successful career using ecological inference in her

25 research, was finding the same thing, that turnout rates depend

1   on the nature of the community you're in.

2   Yeah, I mean, I can't answer for what courts have been

3   allowing people to get away with, but in -- in the research,

4   yes.

5   MR. BRAUNSTEIN: All right. If we could please

6   pull up Table 3 from Dr. Voss's report.

7   BY MR. BRAUNSTEIN:

8   Q.   Dr. Voss, do you recognize what's on the screen here as

9   Table 3 from your report?

10   A.   Yes, I do.

11   Q.   And from your corrected report, right?

12   A.   That is the correct Table 3, yes.

13   Q.   Thank you.

14   Dr. Voss, could you just describe to us what this table

15   is depicting?

16   A.   Okay. So the top block represents Dr. Palmer's

17   results. I just put them there for reference purposes. The

18   bottom block represents my results after I tweaked it to allow

19   adjustment for aggregation bias, for contextual effects.

20   The way you read the chart -- I know it's a lot of

21   numbers, but it's, I think, a fairly straightforward

22   presentation. Each row represents one election contest, which

23   is labeled. Each, then, column represents what the method is

24   estimating for the various racial and ethnic groups.

25   The left-hand column is the best guess, the estimate

1   for the rate at which they voted for the -- the minority

2   candidate of choice, which was always the Democrat.

3   The other two numbers represent the confidence

4   interval. So loosely, the analyst is fairly confident,

5   according to the method, that the answer should be between those

6   two numbers.

7   The bottom one, as I said, comes from my analysis after

8   I did only one thing different. And it's just like 10

9   characters, a small change.

10   I told it, "It's okay for you to adjust the results

11   actively based on your sense of whether people's behavior

12   changes according to the racial and ethnic makeup of

13   their -- their community."

14   Q.   And this table is broken down by racial groups,

15   correct? So the column there with the border around it is the

16   Hispanic voters?

17   A.   That's right. So the leftmost is either what

18   Dr. Palmer or I estimated Hispanics were doing in that contest.

19   And then the other two numbers represent the range that

20   we're kind of confident it should be in.

21   Q.   Dr. Voss, specifically as it relates to the Hispanic

22   voters in this table, can you tell us how this table indicates

23   that your results with the covariant added differ from

24   Dr. Palmer's?

25   A.   Right. So you could pick any one row and compare

1   the -- that row across the two tables to see the difference in

2   what we got.

3   If you do that, you'll see that I am consistently

4   saying that the Hispanic vote for the Democrat is lower,

5   sometimes significantly lower. Sometimes we're talking

6   20 percentage points or more lower for the Democrat than what he

7   estimated it at.

8   He's estimating that the Hispanic vote is very similar

9   to the Black vote. And I'm saying no, that's not true,

10   according to this tweak.

11   The other thing you can notice, and it speaks to the

12   reliability of these ecological inferences using New York data,

13   if you look across my entire table, about half of my results are

14   outside of that range of confidence that Dr. Palmer's results

15   were offering to represent the precision. So just one tweak in

16   the method, and half the results are outside the range that he

17   told to -- represented his level of precision.

18   Even if you don't buy my estimates, it's showing you

19   that these ecological inferences were much less stable, much

20   less reliable than his report would have given the impression.

21   Q.   And, Dr. Voss, directing your attention to the numbers

22   for Black voters compared to Hispanic voters in your analysis,

23   looking at how those numbers track over time, can you tell us if

24   cohesion between Black and Hispanic voters is getting stronger,

25   weaker or staying the same?

1   A.   Yeah. I probably should have just subtracted that one

2 number from the others illustrated, but I didn't. But what

3 you'll see is that there might be a little bit of Republican

4 drift among Black voters. There is a more substantial

5 Republican drift in the 2000s among the Hispanic voters. The

6 gap between Black voters and Hispanic voters appears to have

7 widened, as consistent with my expectations, my hypothesis,

8 based on what I know about US politics.

9   Q.   Does Dr. Palmer's analysis show the same thing?

10   A.   There's maybe a little drift. But, no, on balance,

11 he's still got Hispanics voting overwhelmingly Democratic,

12 sometimes even more Democratic than Black voters in some of

13 these contests.

14   Q.   Dr. Voss, you mentioned you had looked at some polling

15 data. Did you look at any other sources to try to verify your

16 results here as compared to Dr. Palmer's?

17   A.   Right. When you get the result this different -- and

18 that's a red flag. And just because my results were

19 dramatically different from his doesn't mean that mine are

20 right.

21   So what you want to do is due diligence. You want to

22 check some outside sources to see which ones seem closer

23 to -- or might be closer to real life.

24   The first thing I did was try to see if there were

25 polls taken for vote choice in Staten Island, or at least closer

1 regionally to see what was lining up. You can't get polls at

2 that granular level. All I had was New York-level polls, which

3 I wasn't going to trust.

4   Now, there is a group called VoteHub that had made

5 their own ecological inferences for the 2024 presidential

6 election. And they tried to take into account aggregation bias

7 even more elaborate -- way more elaborately, a more

8 sophisticated way than I did. So I checked, to do due

9 diligence, what are their numbers like? Are they like his or

10 are they like mine? VoteHub's results for District 11 are even

11 less polarized.

12   MS. WITTSTEIN: Objection. Hearsay. May I be

13   heard?

14   THE COURT: Sustained.

15 A.   Okay. Anyway, can I say that they made me more

16 confident in my results because they looked more like mine?

17 Q.   Sure. Thank you.

18   In his reply report, Dr. Palmer references an article

19 in the American Political Science Review which he says supports

20 his method of ecological inference over yours.

21   Did you review that article?

22 A.   I did.

23 Q.   And what did that article tell you about your method

24 versus Dr. Palmer's and the results?

25 A.   Right. That's kind of funny. The -- it is indeed true

1   that that is a journal which is in our flagship American

2   Political Science Review Journal, used the simple or the naive

3   ecological inference that made no active steps to take into

4   account aggregation bias. They did use it. But they used it to

5   say how poor it is. They report, first, the confidence

6   intervals are too narrow. It gives a false impression of

7   precision, just as I've told you.

8   They say that it overestimates group cohesion

9   specifically, especially for Hispanics, just as I've told you.

10   It says that it overestimates racially polarized

11   voting, just as I told you.

12   And here's the kicker, it says that naive ecological

13   inference will miss the Hispanic vote according to their results

14   by 20 percentage points, just as I told you.

15   THE COURT: Where did you find this -- this

16   software?

17   THE WITNESS: Well, this is -- this is a research

18   paper that Dr. Palmer cited to show that others were using

19   the simple method. What he didn't tell you is that they

20   were using it to show how poor it was compared to what they

21   were offering as an alternative.

22   BY MR. BRAUNSTEIN:

23   Q.   And, Dr. Voss, I apologize. I may not have been clear.

24   That article was cited by Dr. Palmer in his reply report as

25   support for his method, correct?

1 A. That's right.

2 And like I said, he's correct. They use the simple

3 method. It may be unfairly. If they had used the tweaked

4 method, they may have found ecological inference that performed

5 better.

6 They used the simple method, as he claimed, but the

7 simple method did not perform well in their paper. They -- they

8 show how poor it is, compared to what they're trying to

9 introduce as an alternative.

10 Q. I understand. Thank you.

11 So, Dr. Voss, if -- if Dr. Palmer's inferences are off,

12 and the actual results are closer to what you estimate, what

13 does that mean, in terms of potential real-world impact?

14 A. Well, you know, I don't know the legal impact. I'm not

15 a lawyer. In terms of the level of racial polarization, it is

16 lower than Dr. Palmer reported. In terms of the similarity in

17 vote choice between Blacks and Hispanics, they're not as similar

18 as Dr. Palmer reported.

19 And, again, I'm getting back to the real thing here,

20 which is ecological inference is not as precise with -- and

21 maybe not reliable with the low quality of New York data, such

22 that -- you know, I'm not sure I ever could have gotten a really

23 good -- authoritative, good ecological inferences using this

24 data because they're so data poor, they're so information poor.

25 Q. Thank you.

1   MR. BRAUNSTEIN: Dr. Voss, can we please turn to

2   Table 5 in Dr. Voss's report.

3   Q.   Dr. Voss, do you recognize what is on the screen as

4   Table 5 in your report?

5   A.   Yes, I do.

6   Q.   So, Dr. Voss, can you tell us what this table

7   represents?

8   A.   Right. So Dr. Palmer's code, even though it has to

9   estimate voter turnout by race and ethnicity, didn't report it.

10   In fact, he had stuck in an option that keeps the method from

11   reporting what he's estimating, in terms of turnout by race and

12   ethnicity.

13   At some point, I became suspicious of what those hidden

14   turnout numbers might have been. So all I did, once again,

15   slight tweak to his method, let me see what we're estimating for

16   voter turnout by race and ethnicity here. This is what,

17   therefore, came out of his code, his analysis, his data for

18   turnout.

19   Q.   So what analysis, if any, did you perform to obtain

20   these estimates depicted here in Table 5?

21   A.   Yeah. I literally just changed his code to say, "Don't

22   hide turnout estimates. Tell me what you're estimating for

23   turnout."

24   Q.   So looking at the 2022 elections in Table 5, for

25   example --

1   A.   Okay.

2   Q.   -- could you just tell us what you view these numbers

3 to mean, and what the differences between them mean?

4   A.   Sure. Well, I'm just looking to see if the turnout

5 rates seem plausible, right. That's what you do, due diligence.

6 You look at your numbers, compare it to what you know. If what

7 you're estimating out of ecological inference doesn't line up,

8 it's -- it doesn't mean you're wrong, but it's definitely an

9 argument you need to be more careful.

10   So, again, one thing I would have noticed about 2022 is

11 that Asian turnout was estimated to be really low. We're

12 talking -- it's one-third the size of Black turnout; a quarter

13 of the size of Hispanic turnout; almost one-fifth the size of

14 White turnout.

15   So immediately I'm wondering what's going on with Asian

16 citizens in this area that they should not be participating in

17 politics to that level? It was a red flag.

18   Q.   Thank you.

19   Did these turnout estimates that were included in

20 Dr. Palmer's code that he used to perform his ecological

21 inferences appear anywhere in Dr. Palmer's report or his reply

22 report?

23   A.   Well, as I said, the turnout was hidden by his code.

24 It -- I had to change his code to even see the results. These

25 turnout results, the ones he produced from his ecological

1   inferences, did not appear in his report that I saw.

2   Q.   Is that common, to hide the turnout in a code that

3   you're using to perform ecological inference?

4   A.   Yeah, it's hard to say. As I told you, most of

5   the -- most of the places I've analyzed, you had no turnout,

6   you're not trying to squeeze that much out of the very limited

7   data we have.

8   Q.   Thank you.

9   MR. BRAUNSTEIN: If we could bring up Exhibit 6

10   from Dr. Palmer's report, please.

11   Q.   Dr. Voss, you reviewed Dr. Palmer's report and his

12   reply report, correct?

13   A.   I did.

14   Q.   Do you recall this figure from his report?

15   A.   Yes, I do.

16   Q.   And, Dr. Voss, what is your understanding of the data

17   that's reflected in this Figure 6?

18   A.   Right. So instead of giving his own estimates of voter

19   turnout by race and ethnicity for Staten Island, which could

20   have been computed, he went outside of his ecological inference

21   to a whole different source, and is reporting their estimates of

22   turnout by race and ethnicity for those three years.

23   Q.   So to be clear, these are not the turnout estimates

24   that were included in Dr. Palmer's ecological inferences that he

25   used to obtain his estimates of voter preference?

1   A.   That's right. These numbers did not come from his own

2 estimates of turnout. And if you paid attention earlier to the

3 proportions, they don't look much like the estimates of turnout

4 that came out of his ecological inferences.

5   Q.   Do you know why he might have included turnout

6 estimates that he didn't generate from his ecological inference?

7   A.   Well, I mean, if he thinks their results are more

8 reliable or more accurate than his own work, then, you know,

9 yeah, you go with the best thing you have.

10   Of course, as I've said, once you've run ecological

11 inferences -- because there's no way within the method to know

12 you're wrong -- you could be way wrong and it won't warn

13 you -- what you want to do is check things like this to see if

14 your results are realistic or plausible.

15   I would have wanted to check that. And what I would

16 have discovered is that the ecological inferences Dr. Palmer

17 submitted were getting turnout pretty far off.

18   Q.   So, Dr. Voss, why does -- why does this turnout

19 estimate matter? In other words, Dr. Palmer is making

20 conclusions about voter preference. Why does it matter that his

21 turnout estimates might have been off?

22   A.   Well, if you vastly underestimated the share of the

23 electorate that's Asian, and those Asian voters are voting for

24 candidates, you're assigning their votes to other racial and

25 ethnic groups. You're getting your vote preference numbers

1   wrong too if you've got turnout wrong. He's estimating turnout

2   and voter choice at the same time, so if one is wrong, the other

3   is wrong.

4   Q.   Thank you.

5   Dr. Voss, do you agree with the scope of the analysis

6   that Dr. Palmer performed?

7   A.   No. I -- I do not think it's appropriate to look at

8   the precincts in only one congressional district. And I want to

9   be clear, this is not a legal judgment.

10   Even if all you cared about is what's going on in

11   District 11, you should use more information to get better

12   estimates for District 11. If you think what you care about is

13   the whole city, you use the whole city. If you care about the

14   whole state, you probably still would only do it for a city, you

15   know, the whole city and break the state up into different

16   clumps. So the question of scope for an analysis is different

17   from the legal question --

18   THE COURT: When you're --

19   (Whereupon, the court reporter seeks a

20   clarification.)

21   THE COURT: I'm interrupting.

22   When you're referring to the city, right, we're

23   dealing with Richmond County, the Constitution says you've

24   got to keep working from the counties out, right?

25   THE WITNESS: Right.

1   THE COURT: So you've got to use all of Richmond

2   County, all of Staten Island, and then go outward from

3   there.

4   So when you talk about looking at the other

5   districts, we really have to start with Staten Island and

6   work outward. So tell me which -- which you would think is

7   best to avoid a vote dilution, or a way to address what

8   Petitioners allege.

9   THE WITNESS: Right. So you're asking me a -- as

10   an elections analyst, not as an ecological inference expert?

11   THE COURT: Well, from the results in an ecological

12   inference test, how would you choose, understanding that you

13   have to work from the county outward, and not -- this isn't

14   just one big city, this is five counties. And the

15   Constitution requires us to go from the local government.

16   THE WITNESS: Right. So this is what I'm saying.

17   Even if you told me, as a judge, "I don't care what's going

18   on anywhere else but in CD-11. Give me the best estimate

19   you can give me only in CD-11," I still would run the

20   ecological inference using a broader territory to improve

21   your CD-11 estimates over one that only looks at those

22   precincts.

23   THE COURT: Even if you're only looking for a

24   handful of voters?

25   THE WITNESS: Even if all you cared about

1   was -- you might only care about what's going on in the

2   subset of CD-11 that's moving to District 10, you want more

3   information to get better estimates.

4   And when you -- when you look at Dr. Palmer's

5   table, he's telling you, basically, in a lot of these cases,

6   "I have no idea what Asians are doing here," right? "I

7   don't know how they're turning out. Look at the confidence

8   intervals. I don't know how they're voting. Look at how

9   wide the confidence intervals are."

10   I know how to make that better. Let's borrow some

11   information about what Asian voters are doing on a broader

12   scope to refine our estimates for what Asians are doing only

13   in Richmond County.

14   So really the level of analysis is entirely

15   separate from the legal decision you have to make.

16   THE COURT: Okay.

17 BY MR. BRAUNSTEIN:

18   Q.   So, Dr. Voss, could you just tell us a bit more about

19 what you did in your analysis to determine whether expanding the

20 scope, as you were just discussing, might make a difference in

21 the results Dr. Palmer had obtained?

22   A.   Right. Unfortunately, Dr. Palmer did not give me data

23 for the rest of New York City comparable to what he used, so I

24 did have to do something else.

25   I contacted counsel and I said, you know,

1   the -- "Dr. Palmer is only looking at the precincts in a single

2   district. I don't think that's appropriate. Do you guys have

3   data like his for a broader scope?"

4   I was then provided data that looked somewhat different

5   from Dr. Palmer's. My understanding is that they were generated

6   by Dr. Sean Trende.

7   I tried in -- with the time I had to check the validity

8   of those data, but I am at some level operating at trust, in

9   terms of the data I was given.

10   I then ran one New York City-wide ecological inference,

11   okay. An ecological inference gives you an estimate of what's

12   going on in precinct by precinct.

13   Now, you want wouldn't to put too much stock in any one

14   of them. You wouldn't want to look up your grandmother's

15   precinct and think that is how people voted in that exact

16   precinct.

17   But then what you can do is you can take those

18   precinct-level estimates and aggregate them up to whatever

19   interested you. You can aggregate them up to a congressional

20   district, you can aggregate them up to parts of a congressional

21   district, you can aggregate them up to a county to see what it's

22   saying about a county, about the congressional district.

23   So my results give you results for District 5,

24   District 6, District 7, but they're all coming from that same

25   citywide ecological inference, so that I'm gathering information

1   about how these groups vote citywide.

2   Why citywide? You don't want to go too big. I

3   wouldn't want to do this for the entire state; you're starting

4   to contaminate your results with people who are very dissimilar.

5   But because New York City is an entity that's

6   recognized, because there are a lot of economic entanglements,

7   as we heard, people who live in one, work in the other, that is

8   the kind of proper level of scope to try to get good ecological

9   differences, balancing we don't want too dissimilar people but

10   we want to get as much information as we can.

11   THE COURT: So we should look, for ecological

12   inference purposes, from where people live to where they

13   work?

14   THE WITNESS: What -- what -- when a metropolitan

15   area is defined by the U.S. government, one of the things

16   they take into account -- and maybe the dominant thing they

17   take into account is economic entanglements.

18   So, for example, you know, a lot of people who live

19   in Brooklyn work in Manhattan; a lot of people who live in

20   Staten Island work in Manhattan. So that's why those

21   counties would be considered part of the same metro area.

22   Now, when you're drawing districts, you may care,

23   okay, Brooklyn and Staten Island are commuter communities.

24   These are people who go into Manhattan to work but come back

25   to live with longer driveways and, therefore, they have

1   commonalities and they should be grouped, versus the people

2   who actually choose to live in the city, they may represent

3   a different political interest that you would want to

4   represent in a different district.

5   THE COURT: But if a significant portion of the

6   driveway families, as you've described them, work in the

7   Financial District, then people who live in Lower Manhattan

8   work in the Financial District, does that make it an

9   ecological inference, where we should look at those

10   interests in how those voters from Lower Manhattan and from

11   the driveways of Staten Island vote because of their common

12   economic interests?

13   THE WITNESS: So with this being such a big city,

14   it's not exactly parallel.

15   But what you're asking is pretty similar to should

16   central cities be linked with their suburbs in smaller

17   cities or not. And what you'll find is that people move

18   around, whether they think the central city should be kept

19   together or split, depending on what party it helps.

20   THE COURT: Did you look at the north side of

21   Staten Island, those Black and Hispanic districts, and look

22   at the movement of those communities? Are they -- are those

23   communities transient, or have they been there for decades?

24   THE WITNESS: So I'm not a specialist at all

25   in -- in New York City. And, honestly, I think the people

1   doing this sort of analysis either should be or should be

2   sitting down with people who know that level of granular

3   detail. I don't.

4   The only answers I could give you related to that

5   question was that I'm estimating the political behavior

6   across elections of those constituents in those places.

7   So, for example, the -- Table 6, only for the

8   governor's race, showed you, of District 10, what's the

9   behavior in the part being broken out versus what's the

10   behavior of the voters being left behind, and the same thing

11   with District 11, what is the behavior of the voters being

12   left in District 11 versus the behavior of the voters being

13   left behind?

14   So, for example, one thing you'd see with the

15   District 11 vote is you've got a fairly large White

16   population that votes overwhelmingly Republican in the

17   current District 11. But the illustrative maps crack that

18   White vote so that those Republican voters are being buried

19   in the new District 10, and buried in the new District 11.

20   And -- which gets to your question of should I look beyond

21   just one district? Yeah, you're not going to catch that

22   you're taking this White Republican vote between Brooklyn

23   and Staten Island and cracking it to create two Democratic

24   districts unless -- unless you're looking broader than a

25   single district.

1   Q.   Thank you, Dr. Voss.

2   MR. BRAUNSTEIN: Thank you, Your Honor.

3   BY MR. BRAUNSTEIN:

4   Q.   So, Dr. Voss, you mentioned in your discussion with

5   Your Honor Table 6 in your report. Is this Table 6 from your

6   report?

7   A.   That's the table I was just referring to, yes.

8   Q.   So, Dr. Voss, for all of us in the room who have a hard

9   time understanding a lot of numbers on a chart, can you please

10   tell us about some of the key things to look at when trying to

11   understand the results reflected in Table 6?

12   A.   Yeah. Well, one thing that's interesting, keep in mind

13   that this is only one tweak to Dr. Palmer's method. This is the

14   expand the scope, run the ecological inference for the whole

15   city. So I'm no longer correcting for aggregation bias. Okay.

16   I got rid of that fix; I'm trying is something new.

17   One thing that jumps out is that this correction, this

18   completely independent correction, shows the Hispanic Democratic

19   vote much lower than the Black Democratic vote. I'm getting

20   more or less the same kind of finding that I got with the last

21   tweak. Hispanics are not high 80 to low 90 Democratic voters.

22   They're -- they're numbering at lower numbers.

23   The other thing to note is while, again, I think my

24   confidence intervals are too precise, too confident just as

25   Dr. Palmer's are, the fact that they narrow tell you I got a lot

1   more information to try to improve what my estimate of what

2   Asians are doing, including in District 11, than I did when I

3   tried to get all of my knowledge about Asians from just CD-11,

4   where they're barely more than 10 percent of the population.

5   Q.   Dr. Voss, just to make sure I'm understanding, you

6   performed -- you tried to correct Dr. Palmer's results in two

7   totally separate ways and reached the same finding that his

8   results were incorrect in the same way; is that right?

9   A.   Yeah. In a way I'm validating Dr. Palmer's claim that

10   if you have enough information, then ecological inference can

11   get closer to the right answer without actively correcting for

12   aggregation bias. Using the greater information I had from the

13   city as a whole, I have caught more than aggregation bias than

14   by accident. But you need good data, and just the precincts

15   from District 11 were not good data.

16   Q.   Understood. Thank you.

17   MR. BRAUNSTEIN: Your Honor, we're now going to put

18   up a demonstrative.

19   Q.   So this -- Dr. Voss, do you recognize this as

20   individual rows from Tables 3 and 6 in your report?

21   A.   Okay, yes. So the first row is only the results for

22   2022 governor from the top of Table 3, and also the top of

23   Table 1.

24   The middle row is only the results from 2022 governor

25   from the bottom of Table 3.

1   And the very last numbers, which, by the way, I'm

2   having a little -- hard time seeing, they come from Table 6.

3   So these are three different estimates of what happened

4   for 2022 governor.

5   Q.   If you're having trouble seeing, feel free to refer to

6   the Table 6 in the copy of your report, if that would be

7   helpful.

8   A.   At this age, that's hard too, but I'll do it. Okay.

9   Q.   So, Dr. Voss, could you tell us, how do the results in

10   Table 6 from your report compare to the results for this same

11   election in Table 3 in your report?

12   A.   Right. So this is just illustrating the claim I made a

13   second ago. If you look at what I'm estimating for Hispanics

14   using the covariant tweak, and if you look at what I'm

15   estimating for Hispanics using the citywide analysis, in both

16   cases I'm getting numbers in the mid 70s. So both unrelated

17   tweaks are telling us the same thing, compared to Dr. Palmer's

18   claim that Hispanics voted 90 percent for Kathy Hochul.

19   You'll also notice that the -- unfortunately, Table 6

20   was in proportions, whereas the other table was in percentages.

21   But if you move the decimal place twice, you'll see that because

22   I was using the wider information from the city, my estimates

23   for Asian vote -- the confidence interval is much narrower, so

24   I'm -- I'm getting more precise estimates according to the

25   software because I used that additional information than I was

1 getting when I tried to do it only with the precincts from

2 District 11.

3   Q.   And do these numbers tell you anything about

4 Dr. Palmer's conclusions about cohesion?

5   A.   It -- as all of the things that we've talked about or

6 consulted indicate, the cohesion between Black and Hispanic

7 voters is less, and the gap between Hispanic voters and White

8 voters is less than he reported.

9   Q.   Dr. Voss, let's just return back to Table 6, if we can

10 put that back up on the screen?

11   A.   Okay.

12   Q.   A couple more questions before we wrap up.

13   Again, this is Table 6 from your report that's on the

14 screen?

15   A.   Yes.

16   Q.   What does Table 6 show you about Black, White, and

17 Hispanic voter support for the Black and Hispanic preferred

18 candidate in District 5?

19   A.   District 5?

20   Q.   In the 2022 governor's race.

21   A.   Okay. For District 5, it shows the White vote for the

22 Democratic candidate for governor had a little over one out of

23 three. The Black vote is overwhelmingly -- about

24 96 percent -- for the Democratic candidate, and the Hispanic

25 vote is about three-quarters for the Democratic candidate.

1   (Senior Court Reporter Karen Perlman was replaced

2   by Senior Court Reporter Monica Hahn.)

3   (Transcript continues on the following page.)

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1   Q.   And the White and Hispanic numbers is to use the

2   percentages being consistent?

3   A.   You want me to say?

4   Q.   Sure?

5   A.   96 percent for the democrat was the estimate for

6   Blacks. 33.8 percent was the estimate for the democrat for

7   Whites, and 74.89 percent was the estimate for Hispanics,

8   yeah.

9   Q.   What about District 8?

10   A.   Eight, um, okay. The White vote here is a little

11   over 40 percent for the democrat. They still prefer the

12   republican. 97.1 percent for the Black voters. 78.2

13   percent for the Hispanic voters.

14   Q.   What about District 9?

15   A.   37.9 percent White vote for the democrat. 96.2

16   percent Black vote for the democrat. 77.6 percent Hispanic

17   vote for the democrat.

18   Q.   Dr. Voss, definition of racially-polarized voting

19   in the New York Voting Rights Act is, "voting in which there

20   is a divergent in the candidate, political preferences or

21   electoral choice of members in a protected class for the

22   candidate, or electoral choice of the rest of the

23   electorate," anticipating any objection and understanding

24   you are not a lawyer and without asking you to reach any

25   legal conclusion here, do you believe that 96 percent of one

1   group voting for certain candidate and only 34 percent of

2   another group voting for the same candidate like we saw in

3   District 5 represents a divergence between those two groups

4   political preferences?

5   A.   Well, I'll put on my southern accent for this one

6   and say that is the polarization I used to see analyzing

7   deep south elections in the 1990's.

8   Q.   So, yes?

9   A.   That is a big gap.

10   Q.   Okay.

11   A.   No idea whether it is legally a divergence, but it

12   is a big gap. Like I said deep south elections in the

13   1990's the White vote was in the 30's for the democrats.

14   The Black vote was in the mid 90's for the democrats.

15   Q.   Dr. Voss, Table 6 also contains results from your

16   broader scope analysis for illustrative District 11; is that

17   right?

18   A.   Yes. Once you got the estimates for the precincts

19   you can aggregate them up different ways. So this is the

20   same estimate aggregated up to current District 11 or

21   aggregated up to illustrative District 11.

22   Q.   Can you tell us those same numbers you discussed

23   for Black, White and Hispanics support for the Black and

24   Hispanic preferred candidate in these results in the

25   illustrative District 11?

1   A.   Sure. The White vote is still republican leading,

2 a little more democratic. 42.2 percent for the democrat in

3 illustrative District 11. Black vote still overwhelmingly

4 democratic, 95.1 Hispanic vote is still three quarters

5 democratic.

6   Q.   Do you believe that still represents a divergence

7 in preference between Black and White voters?

8   A.   Not quite deep south levels anymore, but you are

9 still looking at a Black vote that is more than twice as

10 democratic as the White vote.

11   Q.   And you believe that is a significant difference?

12   A.   It can make a real difference in elections.

13   MR. BRAUNSTEIN: Thank you, Dr. Voss. I will

14 now pass the witness.

15   MS. WITTSTEIN: Your Honor, I think we are

16 actually a little ahead of our agreed on timeline here.

17 I would appreciate a five, ten minute recess.

18   MR. BRAUNSTEIN: Just being cognizant of the

19 time here.

20   THE COURT: Five minutes is fine. I appreciate

21 the banter. Let's take a five minute break.

22   You may step down. Please don't speak with

23 your attorneys during the break about this case.

24   THE WITNESS: Understood. Thank you.

25   (Whereupon, a short recess is taken.)

1   THE COURT: When everybody is ready, we can

2   continue.

3   MS. WITTSTEIN: For the record, Nicole

4   Wittstein for the Williams petitioners.

5   Good morning, Dr. Voss.

6   THE WITNESS: Good morning.

7   CROSS-EXAMINATION

8   BY MS. WITTSTEIN:

9   Q.   I want to start with one thing you stated on

10   direct. I would like to make clear for the record.

11   So the first report that you filed, it contained an

12   incorrect table, right?

13   A.   Yes. I copied the wrong table into the box for

14   Table 3.

15   Q.   Just didn't change any of your substantive analysis

16   in the first draft of your report?

17   A.   That is correct.

18   Q.   When you are moving quick, mistakes happen with

19   copy/paste?

20   A.   Clerical errors happen, yes.

21   Q.   Thank you, Dr. Voss.

22   I want to go back to some of the qualifications you

23   testified to on direct-examination, okay?

24   A.   Okay.

25   Q.   So you don't have much experience testifying in

1   redistricting cases, do you?

2   A.   No, no. I usually avoid this.

3   Q.   You usually turn down offers to testify to

4   consulting work?

5   A.   I do.

6   Q.   You testified on direct-examination that you've

7   consulted on what you call a handful of voting rights cases,

8   under ten?

9   A.   Sorry. What was the last word you said?

10   Q.   Under ten I think you said on direct?

11   A.   I think that is correct, yes.

12   Q.   And those cases, about half of them required

13   ecological inference?

14   A.   Um, okay. So if the question put to me was the

15   share I testified on, I may have misspoken because I have

16   been involved as an expert consultant as a consulting

17   witness as well, and at least one of the cases where I use

18   ecological inference was only as a consultant witness.

19   Actually, maybe two.

20   Q.   Okay. Well, let's pin this down. I think there

21   are three cases that you've testified about ecological

22   inference; is that right?

23   I might be able to walk you through them, help you

24   remember?

25   MR. BRAUNSTEIN: Objection. Can you clarify

1   testimony in what form?

2   THE COURT: Please.

3   MS. WITTSTEIN: Sorry, I couldn't hear the

4   objection.

5   MR. BRAUNSTEIN: Can you clarify what you mean

6   by testimony, in what form?

7   Q.   Is it true that you either were deposed or

8   testified at trial in three redistricting cases about

9   ecological inference?

10   A.   No, more than that.

11   Q.   Peterson V. Borst in Indiana?

12   A.   I'm not going to remember them by name. Yes, the

13   Indiana case.

14   Q.   We have Florida in 2024?

15   A.   Tampa case.

16   Q.   Louisiana Nairne v. Landry earlier this year, 2025?

17   A.   Okay. Um, so the only, the only question is I was

18   involved with two Indiana cases and I think they both

19   involved ecological inference. Yeah, that is probably

20   right.

21   Q.   Okay. Thank you, Dr. Voss.

22   Now, of those cases I just named off, only the

23   Nairne v. Landry case in Louisiana this year, 2026 now last

24   year, involved the minority vote dilution claims?

25   A.   That maybe true. I don't pay attention what the

1   lawyers are fighting about in these cases.

2   Q.   So to the extent you are able to recall on the

3   stand today, you haven't conducted or evaluated ecological

4   inference in any other minority vote dilution cases besides

5   those I just named off?

6   MR. BRAUNSTEIN: Objection. Mischaracterizes.

7   THE COURT: Rephrase.

8   Q.   Dr. Voss, are you able to recall on the stand any

9   additional specific cases involving redistricting and

10   minority vote dilution case in which you've evaluated

11   ecological inference besides the three I just listed off?

12   A.   No, not -- no. I'll say, no.

13   Q.   Okay. Dr. Voss, I want to move to your assessment

14   of Dr. Palmer's report in this case.

15   Now, I understand that you have various

16   disagreements with his methods. We'll get to those. I want

17   to start by focusing on where you two disagree.

18   You began your analysis by successfully replicating

19   Dr. Palmer's results from his ecological inference, correct?

20   A.   Yes. And the level of professionalism with which

21   he provided his results and the transparency really stood

22   out. That is not common. And in my report, now here, I

23   want to stress that our differences are over methodical

24   choices, not in terms of professionalism.

25   Q.   Dr. Voss, I want to walk through your verification

1   results, okay?

2   A.   Sure.

3   Q.   Your results were for all intents and purposes

4   statistically identical to Dr. Palmer's when you ran the

5   verification, correct?

6   A.   That is right.

7   Q.   Like to call up Table 1 on Page 2 of intervenors

8   Exhibit 3.

9   These two tables show your verification results,

10   right?

11   A.   Well, the top is just his numbers. The top block

12   are his numbers. The bottom is my verification that shows

13   that the results are very close and that the standard, that

14   the confidence intervals are very similar.

15   Q.   You have a copy of your report before you, right?

16   A.   I do.

17   Q.   I'm going to ask about some numbers. Maybe easier

18   to reference there than on the screen.

19   Are you with me?

20   A.   I am with you.

21   Q.   I would like to first direct your attention to the

22   fifth line up from the bottom in the 2022 house race?

23   A.   Okay. 2022 US House.

24   Q.   So in this election, representative Nicole

25   Malliotakis defeated Max Rose in Congressional District 11,

1 right?

2   A.   Yes.

3   Q.   And the percentages you list in this chart reflect

4 the estimated support for the candidate Max Rose, right?

5   A.   Yes.

6   Q.   You and Dr. Palmer both estimated about 90 percent

7 of Black voters supported Rose?

8   A.   That is correct.

9   Q.   And about 89 percent of Hispanic voters?

10   A.   That is correct.

11   Q.   But only about 24 percent of White voters, right?

12   A.   That is correct.

13   Q.   And as you characterized it on direct-examination,

14 these numbers look like some of the races in the deep south

15 in terms of divergence between races?

16   A.   Those numbers are closer, yes. Those are similar

17 to the deep south spans.

18   Q.   And Max Rose was defeated in that election, right?

19   A.   Yes.

20   Q.   Now like to direct your attention to the 2024 house

21 race. This should be a couple more lines down.

22   A.   I can see.

23   Q.   The results for this house race were similar when

24 verified Dr. Palmer's results, right?

25   A.   Correct.

1   Q.   In this election, the incumbent representative,

2 Nicole Malliotakis defeated Andrea Morse in Congressional

3 District 11?

4   A.   I will take your word for that.

5   Q.   You and Dr. Palmer both estimated somewhere between

6 86 to 89 percent of Black voters supported Morse?

7   A.   Correct.

8   Q.   About 88 percent of Hispanic voters likely

9 supported Morse?

10   A.   Yeah. You know, I take issue with the way you

11 worded that though. These are not my estimates. This is

12 literally Dr. Palmer's code, Dr. Palmer's program,

13 Dr. Palmer's data, and something we haven't mentioned, when

14 running these routines you can do what is call set a seed,

15 in other words tell the computer how to generate what looks

16 like random numbers. I'm even using the same seed as he

17 did. So this is -- this -- if it weren't for differences

18 in our computers, my table should look exactly the same as

19 his.

20   Q.   I understand, Dr. Voss. Happy to clarify for the

21 record that this is your verification of Dr. Palmer's

22 results, correct?

23   A.   Yes, thank you.

24   Q.   When you verified Dr. Palmer's results, your

25 estimates were between 86 and 89 percent of Black voters

1   supporting Andrea Morse?

2   A.   That's correct.

3   Q.   88 percent of Hispanic voters supporting Morse?

4   A.   I agree. That is what Dr. Palmer got.

5   Q.   And 20 percent of White voters supporting Morse,

6   right?

7   A.   That is correct.

8   Q.   And you did not dispute in your report that this is

9   a very widespread suggesting racially-polarized voting?

10   A.   I do not dispute that.

11   Q.   Here, Andrea Morse also was defeated in this

12   election, right?

13   A.   The democrat was defeated, yes.

14   Q.   Now, for the remaining 18 elections, Dr. Palmer's

15   -- apologize.

16   Dr. Palmer estimated that Black voters supported

17   their preferred candidate with around 90.5 percent of the

18   vote?

19   A.   That seems to be an average -- an approximation of

20   the average of the column, yes.

21   Q.   And Hispanic voters did the same with 87.7 percent

22   of the vote?

23   A.   I can believe that is the average of that column,

24   yes.

25   Q.   White voters, 26.3 percent of the vote?

1   A.   Again, I am willing to accept that as the average.

2   Q.   Applying Dr. Palmer's methodology, you don't

3 dispute those conclusions, right?

4   A.   I do not.

5   Q.   Let's turn to where your analysis departs from

6 Dr. Palmer's.

7   Now, there is a lot of technicalities here on

8 statistical analysis. So I want to run through your

9 disagreements quickly to make sure we are on the same page

10 here, okay?

11   A.   Yes.

12   Q.   So one dispute that you have with Dr. Palmer is

13 about the scope of his ecological inference, right?

14   A.   Yes.

15   Q.   Specifically, you contend that his ecological

16 inference should not have been confined to the precincts in

17 Congressional District 11?

18   A.   Correct.

19   Q.   Now, your second criticism is that Dr. Palmer

20 should have adjusted his ecological inference to include a

21 covariate to control for aggregation bias, right?

22   A.   That is not the only way he could have adjusted for

23 aggregation bias. That is the way I did, yes.

24   Q.   So your third criticism is that you noted some

25 counterintuitive trends in his voter turnout estimates,

1 right?

2   A.   Yes.

3   Q.   I want to take those one by one. We will start

4 with the scope issue, okay?

5   A.   Sure.

6   Q.   So you stated on direct-examination that his

7 decision to include only the precincts from Congressional

8 District 11 is contrary to best practices, right?

9   A.   Correct.

10   Q.   But you also state in your report that there is no

11 consensus about how much precinct data to include in

12 ecological inference to obtain the best results?

13   A.   Definitely not, and I said that under oath in

14 multiple cases.

15   Q.   And you also advised that too much data itself can

16 be a problem, right?

17   A.   Too wide a scope can be problematic as well, yes.

18   Q.   Because you might aggregate data from areas too

19 dissimilar in a way that might skew results?

20   A.   That is correct.

21   Q.   And, in fact, in your view, statewide ecological

22 inference is usually not advisable, right?

23   A.   I avoid it in my research, yes.

24   Q.   Now, you stated that in this case, both in your

25 report and on direct-examination that you believe the

1   appropriate scope for this case is the entirety of New York

2   City, right?

3   A.   That is what I used to expand my scope, yes,

4   because a Metropolitan area is a meaningful community.

5   Q.   A Metropolitan area is a meaningful community?

6   A.   Yes.

7   Q.   Are you aware that New York City is the single

8   largest Metropolitan area in the United States?

9   A.   I am.

10   Q.   Its population is around eight and a half million

11   people?

12   A.   Okay.

13   Q.   In fact, that is larger than most states in the

14   country, to your knowledge?

15   A.   I appreciate that.

16   Q.   Are you familiar with New York's boroughs?

17   A.   Um, define familiar?

18   Q.   Are you aware that New York City is divided into

19   various boroughs?

20   A.   Yes.

21   Q.   You have Manhattan?

22   A.   Yes.

23   Q.   Brooklyn?

24   A.   Yes.

25   Q.   Queens?

1   A.   Yes.

2   Q.   Staten Island?

3   A.   Yes.

4   Q.   In your report, you didn't consider whether New

5 York's boroughs might also be meaningful social constructs

6 for purposes of ecological inference?

7   A.   No, I did not have time to play around with

8 multiple levels of scope.

9   Q.   You didn't investigate whether differences in the

10 boroughs in New York City might introduce some of the

11 population variations that can skew results in ecological

12 inference, did you?

13   A.   No, because I only tweaked Dr. Palmer's method one

14 way at a time. I did not try to both expand the scope and

15 the model aggregation bias.

16   The farther you get from what a different

17 research/analyst has done, the easier it becomes for them to

18 say, well, it is not because of X, it is because of Y. I

19 found that when you are judging someone else's work and

20 presenting the issues with it, it is cleaner to just do one

21 tweak at a time to show the effect of it.

22   Q.   I would like to call up Table 6 on Page 21 of

23 Intervenor's Exhibit 3, Dr. Voss's technical report.

24   This is the Table 6 from your report, right?

25   A.   Yes, it is.

1   Q.   This is the citywide ecological inference that you

2   discussed on direct-examination?

3   A.   Yes, it is.

4   Q.   This uses the data I believe you said you obtained

5   from Dr. Trende?

6   A.   Correct.

7   Q.   And it includes all of the New York congressional

8   districts that comprise New York City, right?

9   A.   Correct.

10   Q.   Now, the data that you receive from counsel or

11   Dr. Trende included citizen voting age population and

12   returns for multiple recent elections, right?

13   A.   It did, yes.

14   Q.   But you only examined one contest, correct?

15   A.   Mostly correct. I extracted some of the results

16   from a second one for Table 7, but as we discussed, the

17   risk of clerical errors is not small. I told them there

18   was no way by the deadline I could reproduce Table 6 for

19   other contests.

20   Q.   So Table 6 reflects only the results of the 2022

21   Gubernatorial Election, right?

22   A.   That is what I picked as the focal example, yes.

23   Q.   And as you just stated, you focused on this

24   election in the interest of time?

25   A.   The reason I focused was in the interest of time,

1   yes.

2   Q.   In fact, you stated in your report it took you

3   12 hours to complete the ecological inference for this

4   election?

5   A.   Yes. To be clear though, I wasn't working 12 hours

6   on it. These things take a long time for the computer. So

7   you set it going, you go to sleep, you wake up, hope it is

8   done and has not crashed.

9   Q.   Your computer took 12 hours?

10   A.   The computer worked for 12 hours.

11   Q.   Counsel provided you with copy of Dr. Palmer's

12   reply report?

13   A.   Yes.

14   Q.   You reviewed it?

15   A.   Yes.

16   Q.   Did it surprise you to learn Dr. Palmer

17   successfully replicated this analysis in less than eight

18   minutes?

19   A.   Um, the speed of it surprised me, yes, but the fact

20   that he might have a better computer than I do did not

21   surprise me.

22   There are also adjustments. Somebody who

23   really knows these computers, adjustments one can make to

24   exploit the processors and the like to speed it up. I have

25   no idea if he did that. I do know that is possible.

1   Q.   So if you had been able to exploit the processors

2 to speed up the ecological inference, we might have gotten

3 results from more elections than just the 2022 Gubernatorial

4 race?

5   A.   You still needed the step of producing the tables

6 but, yes.

7   Q.   Let's turn to the results from this table.

8   I would like to direct your attention to the line

9 for the totals for Congressional District 11, okay?

10   A.   Yes.

11   Q.   I think we can get the highlights in the total

12 column. I see there are a few columns under CD-11.

13   So your ecological inference estimates here that

14 95 percent of Black voters in the city voted as a block for

15 Governor Hochul, correct?

16   A.   Sorry. Would you repeat the question?

17   Q.   Your ecological inference estimate here found that

18 95 percent of voters in the city voted as a block for the

19 democratic candidate, Governor Hochul?

20   A.   96.2.

21   Q.   96.2?

22   A.   I'm sorry, are we talking New York City as a whole

23 or?

24   Q.   No, for Congressional District 11.

25   You stated on direct examination when you run the

1   citywide inference you can narrow that down to estimates for

2   one congressional district, right?

3   A.   Sorry.

4   Q.   That is all right.

5   A.   Yes, only in CD-11 the precinct estimates suggest

6   that the Black vote was 95 percent for Hochul.

7   Q.   And 75 percent of the Hispanic vote went to

8   Governor Hochul as well, right?

9   A.   That is what it estimates, yes.

10   Q.   And only 20 percent of White voters in

11   Congressional District 11 under your estimate supported

12   Governor Hochul?

13   A.   Correct.

14   Q.   So in other words, 80 percent of White voters per

15   your estimates voted as a block against Governor Hochul?

16   A.   I believe that is correct, yes.

17   Q.   Thank you. We can take down that exhibit.

18   Now, I want to turn to your methodological disputes

19   with Dr. Palmer about aggregation bias, okay?

20   A.   Okay.

21   Q.   So you testified that Dr. Palmer did not adhere to

22   best practices with ecological inference research, right?

23   A.   Correct.

24   Q.   And that is because he used the simple model for

25   ecological inference, correct?

1   A.   Correct.

2   Q.   And you stated that he should have, I believe the

3   word you used was tweaked his analysis to include a

4   covariant, right?

5   A.   No. I said that all I did to illustrate the

6   problem of not concerning aggregation bias was to tweak his

7   model. All I did was tell it you are allowed to notice

8   these contextual patterns and adjust the estimates based on

9   it. That is not at all what I would have done to properly

10   develop ecological inferences to take into account

11   aggregation bias.

12   Q.   Okay. So your testimony is that best practices

13   would have been to include multiple covariants, run the

14   models different ways using covariants, correct?

15   A.   Yes. I mean, it is unclear what I can tell you

16   about VoteHub, but they did something a lot more

17   sophisticated than what I did.

18   What that APSR article that we were talking

19   about did much more sophisticated than I did. I'm just

20   showing you -- I'm just showing you what happens when you

21   operate within most of the parameters which Dr. Palmer was

22   operating and you tweak the one thing.

23   Q.   All right, Dr. Palmer -- apologies, Dr. Voss.

24   We'll discuss the VoteHub results in a moment. I want to

25   focus back on what you describe as best practices, okay?

1   A.   Yes.

2   Q.   In your report, you did not identify a single

3   redistricting case where any expert has relied on this

4   adjusted form of ecological inference to estimate

5   racially-polarized voting, do you?

6   A.   I assume you mean other than myself.

7   Q.   Other than yourself?

8   A.   No, I have not -- I'm not part of the consulting

9   industry. I did not good try to figure out what courts are

10   letting analysts get away with.

11   Q.   You are aware that the same lawyers who hired you

12   in this case also hired Dr. Sean Trende to offer opinions?

13   A.   I am.

14   MR. BRAUNSTEIN: Objection.

15   THE COURT: Sustained.

16   Next question.

17   Q.   Are you familiar with Dr. Trende's work?

18   A.   I'm familiar with his research.

19   Q.   Are you aware that Dr. Trende also performed

20   racially-polarized voting analysis in redistricting cases?

21   A.   Maybe vaguely. I don't pay attention to this

22   industry.

23   Q.   In compiling your report in this case, did you

24   identify a single case in which Dr. Trende has adjusted

25   ecological inference in the way that you described?

1   A.   I have never read anything Dr. Trende has produced

2   for any case.

3   Q.   Are you familiar with Dr. Alford's work in the

4   redistricting space?

5   A.   I am not.

6   Q.   Were you able to identify any case Dr. Alford

7   adjusted ecological inference in the way you described?

8   A.   I did not try.

9   Q.   Now, it is your understanding that ecological

10 inference is not employed in the way that you described in

11 redistricting cases, isn't that right?

12   A.   I only have a sample of a few cases as you

13 established. I agree that what the experts did there was

14 similar to this and that they ran simple ecological

15 inference in bulk without any refinements based on the

16 circumstances of the election or the place or anything.

17   Q.   In fact, as we discussed earlier, you offered an

18 expert report in the case of Nairne v Landry, right?

19   A.   I did.

20   Q.   And you submitted that report in June of 2025?

21   A.   I will take your word for it.

22   Q.   And do you dispute that in that report you stated

23 that it is your understanding that consultant expert

24 witnesses on redistricting cases do not employ the method

25 that you discussed?

1   A.   I did not dispute that before, and my position then

2   was consistent with what I just told you.

3   Q.   Now, you mentioned a couple of times a tool that

4   you did reference in your report of VoteHub's website,

5   right?

6   A.   Correct.

7   (Transcript continues on the next page.)

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1 CROSS-EXAMINATION

2 BY MS. WITTSTEIN:

3   Q.   And you stated that they ran an ecological inference

4 analysis on the 2024 presidential election?

5   A.   They did.

6   Q.   Now, VoteHub.com is a political media organization,

7 right?

8   A.   That's right.

9   Q.   You noted in your report that that tool has been

10 available for some time now?

11   A.   Okay.

12   Q.   Is that what you stated in your report?

13   A.   That sounds familiar.

14   Q.   And just to make sure the record is clear, that tool

15 has been available since September of 2025, correct?

16   A.   If -- if that is what you want me to stipulate, I don't

17 know.

18   Q.   You're not aware of how long VoteHub's tool has been

19 available?

20   A.   VoteHub, as a whole, has existed for a while. Not

21 off -- not off the top of my head do I know when they released

22 the specific analysis you're talking about.

23   Q.   I'd like to call up VoteHub's presidential precinct

24 map, demographics methodology page.

25   Do you recognize this as the page describing the

1 methodology that you reviewed in putting together your report?

2   A.   It could be.

3   Q.   Do you see the date in the top corner?

4   A.   Yes. September.

5   Q.   So when you stated in your report that this precinct

6 data has been available on their website for some time now,

7 September of 2025?

8   A.   We've now quantified "some time."

9   MS. WITTSTEIN: We can take down the exhibit.

10   Q.   Now, you also stated just now and on direct examination

11 that VoteHub's methodology sought to account for aggregation

12 bias in more sophisticated ways than you did in your report,

13 right?

14   A.   Correct.

15   Q.   But you have not analyzed that methodology in detail,

16 have you?

17   A.   No, no. And my report was very clear on that. I was

18 merely using that for validation purposes, to see if their

19 results were similar to mine. I did not offer it as

20 authoritative. I was very clear that I did not know, if I

21 performed a more refined analysis, if I would end up agreeing

22 with them or not.

23   Q.   And you acknowledge that their methodology might be

24 flawed, right?

25   A.   Absolutely.

kp

1   Q.   Now, as far as you know, VoteHub's methodology has not

2   been peer-reviewed, has it?

3   A.   It has not.

4   Q.   Or published in any reputable journal?

5   A.   Not so far as I know.

6   Q.   Are you aware of who authored the VoteHub methodology?

7   A.   I mean, I know the name, but it doesn't mean anything

8   to me.

9   Q.   You're not familiar with the author as a member

10   of -- or an established member of the scientific community?

11   A.   I -- I know him as a participant in election Twitter is

12   about the extent to which I know that analyst.

13   Q.   And are you familiar with that analyst as -- in

14   election Twitter as someone who graduated college just last May?

15   MR. BRAUNSTEIN: Objection. Asked and answered.

16   THE COURT: Overruled.

17   A.   No, I did not investigate anything but read the

18   methodology and check the results.

19   Q.   Okay. Now, despite your criticisms of Dr. Palmer, you

20   made very clear on direct examination that you did not do a

21   comprehensive assessment of racially polarized voting in

22   Congressional District 11, right?

23   A.   I'm not offering opinions on the -- the legal side.

24   I'm providing numbers that would let others who have the legal

25   training I don't to make those judgments.

1   Q.   I want to get some clarity on the numbers you're

2 providing. You did not generate authoritative estimates of

3 racial patterns within CD-11?

4   A.   I see what you're saying. Yes, that is correct. I do

5 not think that my analysis is done. And as I said, I'm not

6 convinced, with the poor data for District 11, that an

7 authoritative ecological inference could be conducted.

8   Q.   Well, if it can be conducted, you don't know whether

9 the covariant that you offered that you applied to tweak

10 Dr. Palmer's analysis produces the best estimate for racial

11 voting patterns in CD-11, right?

12   A.   No. In fact, without going to outside sources, there's

13 nothing in the ecological inference software or output that can

14 tell you if you've gotten your estimates horribly wrong. This

15 is one reason why it's so hard to get ecological inferences

16 through peer review because scholars recognize that it's

17 dependent on the contextual knowledge, the knowledge of the

18 politics, the knowledge of -- of the place in order to correct

19 for the very high possibility -- very high probability that

20 naive application of ecological inference will send you very far

21 off.

22   Q.   Now, to develop what you would have described as

23 authoritative estimates, you would have run your model multiple

24 different ways, right?

25   A.   Yes.

1   Q.   You would have used different priors related to the

2 covariant?

3   A.   Correct.

4   Q.   But you did not do that analysis before submitting this

5 report, right?

6   A.   No. These are just -- this is Dr. Palmer's methodology

7 with illustrative or demonstrative single changes in what he did

8 so that those of you who knows the law could see what happens.

9   Q.   You have not done that analysis since submitting your

10 report, correct?

11   A.   No.

12   Q.   You were never retained to obtain authoritative

13 results?

14   A.   No. I would have refused such a gig. That wasn't

15 going to be doable in such a short amount of time.

16   MS. WITTSTEIN: I would like to call up Table 4 on

17   page 14 of Intervenors' Exhibit 3.

18   Q.   Dr. Voss, this is a table that's contained in your

19 report, correct?

20   A.   Correct.

21   Q.   It states a conclusion that Dr. Palmer likely

22 overstated RPV in Congressional District 11?

23   A.   Yes, I believe that to be true.

24   Q.   And it includes a line stating your estimate for voter

25 choice just in the 2024 election, right?

1   A.   Yes, that's correct.

2   Q.   So the estimates in this table, this is not an average

3   of your results across all the elections that you reviewed,

4   right?

5   A.   That's correct.

6   Q.   This is just the 2024 presidential?

7   A.   Yes, because the purpose was to show where VoteHub fell

8   relative to those other three numbers, and they only did 2024.

9   Q.   Dr. Voss, did you generate an average of the Hispanic

10 vote for all of the elections that you reviewed?

11 A.   Not that I recall. If I did, it's not in my report.

12 Q.   Do you have a basis to dispute that if you average out

13 those numbers, the estimate for the Hispanic vote is north of

14 70 percent?

15 A.   No, that sounds right.

16 Q.   Now, if you had worked your way to what you call the

17 best estimates you would have been able to with the data, you

18 have no way of knowing whether they would have been closer to

19 Dr. Palmer's or closer to VoteHub, right?

20 A.   I -- I don't know whether I would have gotten close to

21 VoteHub, no. But the -- the analysis with covariants followed

22 indicators, diagnostics from ecological inference software

23 telling me that aggregation bias had been detected. So by the

24 time I had produced these results, I already know there's

25 something in the data that the naive model is missing.

1   Q.   Well, if you had worked your way to the best estimates,

2   you don't know whether it would have showed cohesive voting

3   among Hispanic voters, do you?

4   A.   How do you define "cohesive"?

5   Q.   You don't know whether the vote estimate for Hispanic

6   voters would have been north of 70 percent, right?

7   A.   I cannot say for certain, no.

8   Q.   You can't say whether the estimate would have been

9   north of 75 percent?

10   A.   It's getting much less likely, but no, I can't say for

11   certain.

12   Q.   You don't know whether it could have been closer to

13   80 percent?

14   A.   Really unlikely.

15   Q.   Okay, Dr. Voss.

16   MS. WITTSTEIN: I'd like to call up Table 3 on

17   page 13 of Intervenors' Exhibit 3.

18   Q.   Now, Dr. Voss, this table includes the results that you

19   did get when you ran Dr. Palmer's analysis with the tweak,

20   right?

21   A.   Correct.

22   Q.   And the table on top shows Dr. Palmer's ecological

23   inference results?

24   A.   Correct.

25   Q.   And the table on the bottom is those results with the

1   tweak?

2   A.   Correct.

3   Q.   Now, isn't it true that more than half of your

4   estimates were not outside of Dr. Palmer's confidence intervals?

5   A.   That's right. It was close to 50-50.

6   Q.   So put another way without the double negative, more

7   than half of your estimates applying a covariant fall within

8   Dr. Palmer's confidence intervals?

9   A.   Half do, half don't, yes, roughly.

10   Q.   Now, some of the disparities that you notice between

11   your results and Dr. Palmer's raise what you called a red flag,

12   right?

13   A.   Yes.

14   Q.   And it raised a red flag because you noticed that

15   groups were only trending down, but no group had a

16   correspondingly increased estimate in voter choice for the

17   Democratic candidate?

18   A.   I did offer that as an example of the things I saw,

19   yes.

20   Q.   Now, as you explained in your report, each group's

21   Democratic voting rate, when weighted by the size of the

22   electorate, needs to add up to the known vote totals for that

23   candidate, right?

24   A.   Yes.

25   Q.   Now, one thing that might explain the disparities

1   between yours and Dr. Palmer's results is differences in turnout

2   estimates, right?

3   A.   Correct.

4   Q.   And that's because the ecological inference model that

5   you run produces estimates both for voter choice and for voter

6   turnout, right?

7   A.   Yes, that is correct.

8   Q.   So if the total percentage of voters supporting a

9   candidate in a group goes down, but more people within that

10   group turned out to vote than originally estimated, that could

11   help explain the differences in the estimates you're seeing

12   here?

13   A.   I'm really sorry. I need you to ask that again.

14   Q.   You know what, let's move away from the abstract.

15   THE COURT: Okay.

16   Q.   So you tried to make some sense of the mathematical

17   differences between your voter choice estimates and Dr. Palmer's

18   estimates, right?

19   A.   Again, I don't -- I don't know what that question

20   means.

21   Q.   You re-ran your verification of Dr. Palmer's work, but

22   with voter turnout kept in the mix?

23   A.   So I could see what the results were, yes.

24   Q.   And as you described on direct examination, you said

25   that analysis didn't make very much sense, right?

1   A.   Yes.

2   MS. WITTSTEIN: I'd like to call up Table 5 on

3   page 18 of Intervenors' Exhibit 3.

4   Q.   So this table reflects the results that you described

5   in your report as not making sense?

6   A.   Yes.

7   Q.   Specifically, you highlight in your report that some

8   Black voters appeared to sit out the 2024 presidential contest

9   compared their participation in congressional elections?

10   A.   Again, that was a small example, but yes.

11   Q.   That was the example you cited in your report, right?

12   A.   I said "for example." But yes.

13   Q.   Now, these turnout results are reported in the bottom

14   three rows here, right?

15   A.   I'm sorry, the 2024?

16   Q.   2024.

17   A.   Yes. The bottom three rows are for 2024.

18   Q.   So the example you highlighted in your report as not

19   making sense is that it was irregular that Black voter turnout

20   for US senate and congressional elections were about

21   1 percentage point higher than the turnout result for the 2024

22   presidential?

23   A.   Yes. And to be clear, in Dr. Palmer's reply, he said,

24   "Well, these aren't really statistically different results

25   because when you look at the error in the estimate, they're

1   statistically effectively the same." That's not wrong.

2   And the point was this was not an -- this was not final

3   evidence that the results were bad. It's just a red flag that

4   gets you to probe and try to refine your model.

5   So I agree with what he said. I mean, those are

6   effectively the same. But when you see something that doesn't

7   go in the direction you expect it to, it's -- it's just

8   something to keep checking, just as if VoteHub disagrees with

9   somebody, you don't stop there, it's just a little red flag to

10   keep checking.

11   Q.   So just to be clear, you stated in your report that

12   Dr. Palmer's results did not make sense, right?

13   A.   There were patterns that don't fit with what we know,

14   yeah.

15   Q.   Patterns that you now agree are statistically

16   insignificant, in terms of the difference?

17   A.   Yes. I don't dispute that.

18   Now, keep in mind, though, even though the differences

19   may not be statistically different, those differences are still

20   influencing what you're also estimating for vote choice. So

21   even though, looking at those differences, you can't say with

22   confidence that African Americans were less likely to vote for a

23   president than they were for a senator, when it then goes to

24   estimate how Blacks voted for president or senator, it's still

25   usually assuming that there are more African Americans in the

1 electorate, practically, more often than not, than there

2 were African Americans in the electorate voting for president

3 more often than not --

4   (Whereupon, the court reporter seeks a

5 clarification.)

6   A.   So even though a 41.8 and a 40.7 may not be

7 significantly different, such that someone would say, "Okay, I'm

8 confident now, more African Americans voted for senator than

9 president," still, when you're estimating vote choice among

10 those voters, you're going to have more African Americans in the

11 electorate for senator and, therefore, assume you've got more

12 Black votes to distribute than you would have for the

13 presidential result, more often than not.

14   So statistically insignificant errors are not

15 necessarily insignificant with the rest of the results that

16 you've produced.

17   Q.   Dr. Voss, you also stated that it didn't make sense

18 that more Black voters appeared to vote in the 2022 elections

19 for senator and Congressional District 11 than for New York

20 attorney general and governor, right?

21   A.   Yeah. Again, these are just some quirky results that

22 would make you want to keep refining the model.

23   Q.   The quirk that you highlighted is that the difference

24 between these elections was between one and one and a half

25 percentage points in election turnout?

 1   A.   Yes. And again, I'm not claiming that it's

 2   statistically significant. It's just something to see if it

 3   goes away as you refine the model.

 4   Q.   The other final point that you highlighted in your

 5   report as a reason Dr. Palmer's turnout results didn't make

 6   sense is that Black voters appear to participate in the 2021

 7   public advocate race more than in the mayoral race?

 8   A.   That was another example of turnout being higher among

 9   minority voters for lower ballot contests than for upper ballot

10   contests.

11   Q.   A .7 percent difference, right?

12   A.   Yes.

13   Q.   And, again, you agree that that is statistically

14   insignificant?

15   A.   That is correct.

16   Q.   So after rerunning Dr. Palmer's ecological inference to

17   determine if his turnout results made sense, you did not do the

18   same for your own ecological inference with the tweak with the

19   covariant, right?

20   A.   Well, at the time of my report, I had not.

21   Q.   Have you done so since?

22   A.   Yes, I have.

23   Q.   You haven't supplemented your report to include those

24   turnout estimates?

25   A.   No.

1   Q.   Now, in your report you stated that those results were

2 likely to contain anomalies, right?

3   A.   Yes.

4   Q.   Did you find anomalies when you re-ran to estimate

5 voter turnout?

6   A.   Yes. I'm -- I'm back to what I've said before. This

7 is not my analysis. This is not the analysis I would do. This

8 was Dr. Palmer's analysis with one setting changed.

9   Q.   Well, this is the analysis that you're testifying to

10 here today, right?

11   A.   It is what I'm testifying you get when you allow the

12 model to take into account aggregation bias.

13   Q.   Were you present for Dr. Palmer's testimony -- I think

14 it was two days ago now?

15   A.   I was.

16   Q.   Did you hear that he also ran your ecological

17 inferences again with turnout estimates?

18   A.   I did. And I heard him say that they were -- they

19 were -- they were -- I don't know his word choice -- wonky.

20   Q.   Did you hear him testify that your EI model predicted

21 75 percent turnout among Hispanic voters in some elections?

22   A.   I heard that reference, yes.

23   Q.   To the extent of your knowledge, is that consistent

24 with national trends and polling that you stated that you

25 reviewed?

1   A.   No, no. This is definitely not where I would end in an

2 ecological inference.

3   And as I've said, and I'll say again, with the data

4 we're using here, only from CD-11, only those precincts, with

5 the low level of information New York provides, I never would

6 have offered this as authoritative. I don't think an

7 authoritative analysis could be done with so little data.

8   Q.   In fact, you even stated on your direct examination

9 that turnout estimates are typically lower among minorities in

10 areas that are heavily populated with White people?

11   A.   Yes. And one anomaly of the turnout results for the

12 analysis with the covariants is that it's estimating a minority

13 turnout higher than Whites. Yet, again, that's the sort of

14 thing that if you're doing this properly, you would keep working

15 at.

16   Q.   Now, did you hear Dr. Palmer testify that in the other

17 races category, your model estimated turnout north of

18 95 percent?

19   A.   Yes.

20   Q.   To the extent of your knowledge, is that consistent

21 with the sort of polling that you reviewed on national turnout

22 estimates?

23   A.   I mean, "other" isn't a real category. But, yes, that

24 would have been a quirk that would have caused me to keep

25 working.

1   Q.   All right. Dr. Palmer -- apologies. Dr. Voss -- it's

2 the second time I've done that.

3   I want to turn to the last subject that you discussed

4 with counsel on direct examination, which was your estimates of

5 voter cohesion in Districts 5, 8 and 9, okay?

6   MS. WITTSTEIN: And we can take down Table 5.

7   Q.   So you -- you stated in your report that there is

8 racially polarized voting in Congressional Districts 5, 8, and

9 9, right?

10   A.   I hope I didn't.

11   Q.   Would it surprise you to learn that you did?

12   A.   Yes. Because I was trying to avoid that language.

13   Q.   I would like to direct your attention briefly to

14 page 20 of your report. Are you with me?

15   A.   Yes.

16   Q.   Second paragraph down, beginning with "Third."

17   A.   Okay. Got you.

18   Q.   And the third line begins, "Specifically, in the case

19 of this contest, we see racially polarized voting in

20 Congressional Districts 5, 6, 8, and 9."

21   A.   Yes, I see I used that language.

22   Q.   You did use the language --

23   A.   I did.

24   Q.   -- "racially polarized voting"?

25   A.   I did.

1   Q.   You would back off that here today?

2   A.   Yeah. I was not meaning that in a legal sense.

3   Q.   Okay, Dr. Voss.

4   Now, you would agree with me that a prerequisite to

5   finding racially polarized voting is that a racial group has a

6   clearly preferred candidate, right?

7   A.   That is my understanding of the law, yes.

8   Q.   And you would agree with me that cohesion in some

9   cases, as you've stated several times today, can be clearer in

10   some cases than others, right?

11   A.   "Can be clearer"?

12   Q.   Can be clearer.

13   A.   Yes.

14   Q.   For example, we can probably agree that 95 percent

15   cohesion among a group in support of a candidate represents

16   cohesive racial voting?

17   A.   If -- if your definition of cohesion is how lopsided

18   their vote is, then, yes, you could have a vote that is more or

19   less lopsided.

20   Q.   If we're defining cohesion in the sense of whether

21   voters of a particular racial group agree on a particular

22   candidate, 95 percent is pretty -- pretty close, right?

23   A.   Yes, that is what I meant by "lopsided."

24   Q.   Would you say that 51 percent of voters supporting the

25   same candidate represents cohesive voting?

1   A.   Again, that's a legal judgment. I have no opinion on

2 that.

3   Q.   Well, I would like to take a look at the numbers that

4 you reported in your analysis here. Okay?

5   MS. WITTSTEIN: I would like to call up Table 6 of

6   Dr. Voss's report.

7   Q.   Now, just to remind the Court, this table reports

8 ecological inference estimates for the 2022 gubernatorial

9 election only, right?

10   A.   Yes.

11   Q.   So in Congressional District 5 first, about 34 percent

12 of White voters supported Governor Hochul, right?

13   A.   Correct.

14   Q.   Meaning that only 66 percent of White voters supported

15 Governor Hochul's opponent in that election?

16   A.   I think this is mostly two parties -- I mean it's not

17 that I can't subtract, but with that caveat, yes.

18   Q.   And in Congressional District 8, only 6 -- only 60

19 percent of White voters supported the defeated Republican

20 candidate, right?

21   A.   If subtraction gives us that number, then yes.

22   Q.   And in Congressional District 9, only 62 percent of

23 White voters supported the Republican candidate?

24   A.   With the same caveat, yes.

25   Q.   Well, let's take a look at the additional analysis that

kp

1   you ran. You noted that you ran results for another election in

2   Table 7, right?

3   A.   Correct.

4   Q.   And it was counsel that asked you to see if there was

5   racially polarized voting in this particular election?

6   A.   They expressed a particular interest in Districts 5, 8,

7   and 9. I did not know why; I didn't care.

8   They asked me if I had run the citywide analysis for

9   any other elections so that I can give them more information

10   about Districts 5, 8, and 9.

11   I said, "Well, I've run the presidential but I don't

12   think I'm going to be able to have a pretty table for you."

13   They said, "Well, will you just give us what you've got

14   for 5, 8, and 9?"

15   And so I added it -- I think transparent as it was, I

16   added it in case that was useful to others.

17   MS. WITTSTEIN: I'd like to call up Figure 7 on

18   page 21 of Intervenors' Exhibit 3.

19   Q.   So this table reports the results for the 2020

20   presidential election, right?

21   A.   Correct.

22   Q.   And this is using the same citywide data that you used

23   to produce Table 6?

24   A.   Correct.

25   Q.   And you stated in your report that you found similar

1 polarization in this election, right?

2   A.   Would you direct me to where I said "similar"?

3   Q.   We can go back to page 20 of your report.

4   A.   Mm-hmm.

5   Q.   Same paragraph.

6   A.   Okay.

7   Q.   It says, "Late in this process, I was asked whether

8 such polarization was appearing in other contests, especially

9 for 5, 8, and 9."

10   A.   Yes.

11   Q.   The answer is yes, it appeared in other contests?

12   A.   Yes.

13   Q.   Table 7 shows similar polarization in the 2020

14 presidential election?

15   A.   Yes.

16   Q.   Well, let's talk about those results here in Table 7.

17   A.   And -- and to be clear, "similar" is a vague word. At

18 this point all I mean by "polarization" is that, best guess,

19 White voters were supporting one candidate, Black and Hispanic

20 voters were supporting a different candidate.

21   Q.   Well, I would like to discuss the -- the degree of

22 polarization that you deem similar. The percentages listed here

23 reflect support for the Democratic candidate, right?

24   A.   That's correct.

25   Q.   And White voters in Districts 5, 8, and 9 in this

1 election were even less cohesive than in the 2022 gubernatorial

2 election, right?

3   A.   That is correct.

4   Q.   In Congressional District 5, only 55 percent of White

5 voters supported Donald Trump?

6   A.   That -- I'm almost certain that's correct, yes.

7   Q.   And in Congressional District 11 -- I'm sorry. In

8 Congressional District 8, it was only 51 percent that supported

9 President Trump?

10   A.   That is the best guess. With confidence intervals it

11 could be above or below 50, actually.

12   Q.   It might have been below 50 percent supported

13 President Trump?

14   A.   Could have been, yes.

15   Q.   And the same thing in Congressional District 9, only

16 about 54 percent of White voters supported President Trump?

17   A.   That is correct.

18   Q.   And this doesn't include confidence intervals either?

19   A.   The table doesn't have the confidence intervals. The

20 replication code I gave would have allowed Dr. Palmer to look at

21 the confidence intervals, but I did not get them into the table,

22 no.

23   Q.   You did not include the confidence intervals?

24   A.   I did not.

25   Q.   And it's possible that White support for the Republican

1 candidate here was actually under 50 percent?

2   A.   Yes.

3   MS. WITTSTEIN: Thank you.

4   I pass the witness.

5   THE COURT: Redirect?

6   MR. BRAUNSTEIN: Could we have one moment,

7 Your Honor?

8   THE COURT: Yes. You know what, everybody stay in

9 place. I'll be right back.

10   (A recess is taken.)

11   MR. BRAUNSTEIN: Your Honor, we have nothing

12 further for Dr. Voss. Sorry.

13   THE COURT: Thank you for your testimony. Safe

14 travels home.

15   Please watch your step on the way down, it's

16 multiple steps.

17   (Witness excused.)

18   THE COURT: Do you want to call the next witness?

19   MR. BUCKEY: Good morning, Your Honor.

20   Christopher Buckey on behalf of the respondents.

21 We would like to call Dr. John Alford.

22   THE COURT: Bring up the witness and administer the

23 oath.

24   THE COURT OFFICER: Raise your right hand. Do you

25 swear or affirm to tell the truth, the whole truth, and

1   nothing but the truth?

2   THE WITNESS: I do.

3   THE COURT OFFICER: Thank you. Please have a seat.

4   For the record, please state your full name and

5   address.

6   THE WITNESS: My name is John Alford, A-l-f-o-r-d.

7   And I live at 14827 Heather Valley Way, in Houston, Texas.

8   J O H N   A L F O R D,

9   having been first duly sworn/affirmed by the Court Officer, took

10   the stand and testified as follows:

11   DIRECT EXAMINATION

12   BY MR. BUCKEY:

13   Q.   Dr. Alford, good morning.

14   A.   Good morning.

15   Q.   Could you just tell the Court briefly what your current

16   professional position is?

17   A.   I'm a full professor of political science at

18   Rice University. My specialty is American politics, voting

19   behavior, elections, and the statistical methods.

20   Q.   Thank you.

21   MR. BUCKEY: And, Your Honor, again, in the

22   interest of the brevity for today, I'm not going to go into

23   Dr. Alford's otherwise very impressive qualifications, and

24   would offer him now as an expert in both voter dilution and

25   polarization.

1   And since Dr. Alford has done a report, I would

2   also move that into evidence now. That's Respondents'

3   Exhibit 2, both requests are in accordance with the parties'

4   stipulation.

5   THE COURT: Without objection, both the witness is

6   accepted as an expert witness for the reasons just mentioned

7   and the report is admitted on -- by stipulation.

8   MR. BUCKEY: And we request that the clerk provide

9   a copy now of Dr. Alford's report to Dr. Alford.

10   (Handing.)

11   MR. BUCKEY: Thank you.

12   BY MR. BUCKEY:

13   Q.   Just briefly, Dr. Alford, you have testified as an

14   expert witness in redistricting and voting rights litigation in

15   the past; is that right?

16   A.   Yes. Over 40 years, well over 50 cases.

17   Q.   And have you provided consultation to municipalities

18   regarding redistricting?

19   A.   I have provided assistance to municipalities and school

20   boards. I have drawn districts for municipalities and school

21   boards -- I've assisted -- I've provided support to both

22   municipalities and school districts in drawing districts. And

23   I've assisted them in the Section 5 era in obtaining justice

24   department preclearance for those district plans.

25   Q.   Okay. And for this particular matter, what materials

1 did you use and rely upon in forming your opinions?

2   A.   So here I'm working primarily with data disclosed by

3 and the reports provided by Dr. Palmer; the report of

4 Dr. Cooper; and then to a narrower extent, to some data from

5 Dave's Redistricting.

6   Q.   Okay. And broadly, what questions were you asked to

7 analyze for this engagement?

8   A.   Initially, was broadly to simply address the voter

9 polarization analysis that was provided by Dr. Palmer.

10   Q.   And did you accept Dr. Palmer's methodology?

11   A.   Yes.

12   Q.   And did you use his data and his evaluations in forming

13 your conclusions?

14   A.   Yes. So to be clear, when I say I accepted

15 Dr. Palmer's data, I performed a variety of checks on the data

16 that he provided disclosure, checked the analysis to see that I

17 could confirm his results. And when I was confident that the

18 data was appropriate and the results were accurate, I then

19 proceeded relying entirely on Dr. Palmer's results.

20   Q.   Okay. And what did Dr. Palmer analyze?

21   A.   He analyzed the voting behavior of various racial

22 groups in the existing Congressional District 11 and in the

23 illustrative District 11.

24   (Senior Court Reporter Karen Perlman was replaced

25   by Senior Court Reporter Monica Hahn.)

1   Q.   And how many elections was that, do you recall?

2   A.   Twenty elections for the existing district, 18 for

3   the I will active district.

4   Q.   Can we pull up Dr. Palmer's report, please.

5   Dr. Palmer, did you review CD-11's 2024

6   demographics?

7   A.   I'm Dr. Alford.

8   Q.   Excuse me. First time for me.

9   A.   I'm the older guy. Dr. Palmer is the young, virile

10   looking fellow. I'm the old gray-headed guy.

11   Q.   Let me rephrase.

12   Dr. Alford's, did you review CD-11 2024

13   demographics?

14   A.   Yes.

15   Q.   And that is in table one of your report that we're

16   showing now?

17   A.   Yes.

18   Q.   And where did you get this data?

19   A.   This was directly from Dr. Palmer's report and

20   disclosures.

21   Q.   What does this data show you?

22   A.   It shows me that given what is provided in the

23   table, that Black voters are voting cohesively. Hispanic

24   voters are voting cohesively. Asian voters probably not

25   cohesively, and White voters somewhat less cohesively than

1   Black voters, but also voting cohesively.

2   Q.   Does it show anything to you about the size of the

3   minority population in CD-11?

4   A.   No.

5   Q.   Dr. Alford's, did you also reviewed Dr. Palmer's

6   racial-polarized voting analysis in the illustrative plan?

7   A.   Yes.

8   Q.   And did you, in fact, compare the results from the

9   actual CD-11 to the illustrative plan?

10   A.   Yes.

11   Q.   Okay. And how did you do that?

12   A.   So the, basically provide again directly from

13   Dr. Palmer the comparable analysis for the, the territory of

14   illustrative 11, then comparing the average cohesion for

15   each of these groups. Not including in the case of actual

16   CD-11, the two congressional contests. So looking at the

17   18 elections that are common between the two geographies.

18   Looking at the average cohesion estimates for each of those.

19   Q.   Okay. What conclusions did you draw from doing

20   this comparison?

21   A.   There is -- it is certainly not the case that the

22   illustrative district encompasses more cohesive Black voting

23   population or a more cohesive Hispanic voting population.

24   In both cases, the point estimates are actually lower for

25   the groups in the illustrative district. That is in

1   contrast to the much more substantial difference for

2   non-Hispanic Whites and Asian voters, both of which are

3   substantially more likely to vote democratic in the

4   illustrative district compared to the actual CD-11.

5   Q.   And within your analysis, did you see any change in

6   the total amount of minority voting shares in the

7   illustrative plan?

8   A.   No.

9   Q.   So in your opinion, Dr. Alford, is there a

10   practical implication of these comparisons when the court is

11   going to try to determine whether there is dilution that can

12   be remediated through this illustrative plan?

13   A.   I think there are two things you would look at when

14   you are trying to understand what the illustrative plan is

15   offering to the court.

16   One would be is the illustrative plan uniting

17   or perhaps reuniting a minority population that has been

18   divided by the lines that have been drawn. So that is a

19   fairly common notion of vote dilution with regard to

20   districting is that the district lines dilute minority

21   voting either by dividing minority population between

22   districts or by overcrowding, compacting minority population

23   into a single district.

24   That doesn't appear to be the issue here

25   because again you have minority population in the

1   illustrative district is not significantly different than

2   the minority population in the original district. And in

3   fact, the balance of population really doesn't shift at all.

4   You also might argue that you are looking for a

5   more politically cohesive minority population in drawing the

6   illustrative district. That is not the case here either.

7   So it is, it certainly indicates that the, that

8   the, what is being offered here is essentially the remedy,

9   sort of what is it that is being remedied. That seems to be

10   essentially a partisan issue related to the vote, not of

11   minority, of any of the minority groups that are at issue

12   here but rather the behavior of non-Hispanic White and

13   non-Hispanic Asian voters.

14   Q.   So you would agree with Dr. Palmer's conclusion

15   that the minority preferred candidate does better in the

16   illustrative plan?

17   A.   So the, what is different about, besides the

18   obvious geography that has been discussed at some length,

19   to me the, what is clear, politically different about the

20   plans is that both are, both suggest a competitive CD-11, a

21   rarity these days at congressional elections, a competitive

22   CD-11 in its existing form that leans republican to be

23   replaced by a competitive CD-11 that leans democratic.

24   Q.   Is that accomplished by swapping in democratic

25   leaning White voters from outside of the current CD-11?

1   A.   Both more democratic leaning White voters,

2   non-Hispanic White voters and non-Hispanic Asian voters,

3   yes.

4   Q.   Dr. Alford, why is this partisan substitution, why

5   is that material to evaluating claims about

6   racially-polarized voting and overall district performance?

7   A.   I think for me, at least, I'm interested in as it

8   connects to the broader picture about the nature of the

9   polarization itself. So I believe polarization itself is,

10   reflects a very strong influence of partisanship. And I

11   think interestingly the dispute here, as I understand it

12   between the existing district and the illustrative district

13   also turns out to be essentially a partisan issue.

14   Q.   And in your analysis, Doctor, did you also consider

15   the race of the candidates in the elections that Dr. Palmer

16   examined?

17   A.   Yes. So if you look at Dr. Palmer table you can

18   see there are two things that aren't included there that I

19   think are useful to the, certainly to me as an analyst and

20   to the court, and that is the party affiliation of the

21   candidates as reflected on the ballot and the race or

22   ethnicity of the candidates. So that is an important

23   consideration. That is a very common consideration in these

24   kinds of cases.

25   Q.   That is in Table 4 of your report?

1   A.   That's correct.

2   Q.   And you started to get into that on your prior

3   answer. Why is the race of the candidate relevant for the

4   court here?

5   A.   So it is relevant in a broad sense and relevant in

6   an analytical sense.

7   In the broad sense the race of candidate is

8   important. Its always been important in these cases. It is

9   part of the totality of circumstances, the degree to which

10   members of the group --

11   MS. BRANCH: Objection, to the extent he is

12   testifying to what the law requires or what the law

13   says.

14   MR. BUCKEY: Your Honor, he has to apply the

15   law in his analysis. This is the standard that has been

16   given to him.

17   THE COURT: I will allow it.

18   A.   So again, I've been doing this for 40 years. I've

19   never been involved in a case where the race or ethnicity of

20   the candidates was irrelevant. It is in, I would say in

21   almost, by far the majority of the cases I was involved in.

22   In my early involvement it has been the essential element of

23   the vote dilution inquiry and it remains an important

24   element in my view. But there are players experts I have a

25   lot of respect for that will only look at racially-contested

1   elections. Think the race of the candidates is so important

2   that they don't even analyze elections that aren't racially

3   contested. So I think racially-contested elections have

4   always been considered to be of some utility both within the

5   academic discipline and in the evidence that is, that I've

6   seen brought before the court. So I can, I continue to

7   consider it as I always have.

8   Q.   Okay. Thank you. Can we pull up Table 5.

9   Dr. Alford's, what does your Table 5 show?

10   A.   Sorry?

11   Q.   What does your Table 5 show?

12   A.   So Table 5 just looks again at another aspect of

13   this issue about the race of candidates and the degree to

14   which members of the minority group are elected to office.

15   It shows that the, in terms of the elections that are being

16   looked at here, it is, it is not the case that the election

17   of minority candidates to office is sort of deeply affected

18   by the contrast between CD-11 and the illustrative district.

19   Both in its current form and it's illustrative form the

20   district would be expected to elect minority candidates to

21   office.

22   Q.   Okay. So let's get back to this, to

23   Dr. Palmer's analysis and his assessment that the minority

24   preferred candidates performance improves in the

25   illustrative district. Again, in your opinion, is that

1   accomplished primarily through altering the partisan

2   composition of CD-11?

3   A.   It is.

4   Q.   So to say it a different way, is it fair to say

5   petitioners, they didn't improve the performance in the

6   illustrative district by materially increasing the cohesion

7   of the minority voters or the amount of their votes share;

8   is that right?

9   A.   That is correct. The overall change in the

10   district is not a function of the combined cohesion and

11   numerosity of minorities. It is the result of, again, a

12   change in the composition of the non-Black, non-Hispanic

13   population.

14   Q.   Do you agree with Dr. Palmer that there is

15   polarization in CD-11?

16   A.   Yes.

17   Q.   And in your 40 years of experience has, is

18   polarization common?

19   A.   It is common, has been common, and I would say in

20   that 40 years is increasingly common.

21   Q.   So based solely on the data that is in

22   Dr. Palmer's report, do you have an opinion as to whether

23   the polarization he identifies in CD-11 is partisan?

24   A.   Yes. I think that is exactly what my Table 4

25   indicates. So that is -- my conclusion is that the

1   empirical evidence from Dr. Palmer's analysis is that we --

2   the degree of partisan polarization matches the overall

3   degree of polarization in the district and, well, that is

4   what the data shows.

5   Q.   And we'll talk about Dr. Palmer's reply, but you

6   did review that reply report?

7   A.   Yes.

8   Q.   Okay. Is there anything in his reply that rebuts

9   your opinion that there is partisan polarization in CD-11?

10   A.   So he indicates that he believes that the evidence

11   of partisan polarization is not relevant or not important

12   which is a different assessment than saying he doesn't

13   believe in the analysis. He does not in any way challenge,

14   alter or provide other empirical evidence to suggest that my

15   analysis is in any way problematic. He just suggests that

16   it is irrelevant.

17   Q.   So, again, operating solely based on the data in

18   Dr. Palmer's report, do you have an opinion as to whether

19   the polarization he identified in CD-11 is racial?

20   A.   So from the evidence that we have and the -- it is

21   important to understand that the evidence we have is here

22   that I'm presenting is not by adding sort of new variables

23   or new models or new specifications. This is

24   Dr. Palmer's analysis. So what is it that

25   Dr. Palmer's analysis tells us when we take into account

1   something that both we know and that typically the voters

2   know which is the party affiliation of the candidates is

3   indicated on the ballot, the race of the candidates. And

4   what we can see here is that the response of different

5   racial and ethnic groups in CD-11 to republican and

6   democratic candidates is very different. So overwhelmingly

7   democratic. Hispanics in this area vote substantially

8   democratic although less democratic than Black voters.

9   White non-Hispanic voters vote decidedly republican. Asian

10   voters are a much more mixed pattern.

11   So if we are talking about their voting

12   behavior relative to the party affiliation of candidates, it

13   is dramatically different by racial groups, which is what

14   some people would characterize as racially-polarized voting.

15   But I hesitate to use that terminology because I think the

16   implication of that is broader than what the data shows.

17   It leaves out the fact that that is relative to

18   the party of the candidates. So in my table we can see that

19   when we look at the issue of the race of the candidates, is

20   the same thing true? Do the voters respond in very

21   different ways. Are Black voters much more likely to

22   support, for example, a Black democratic candidate then a

23   White democratic candidate. The answer is, no. Blacks

24   overwhelmingly support Black democratic candidates. They

25   overwhelmingly almost exactly the same percentage support

1   White democratic candidates when you go through the racial

2   groups.

3   So the issue of are the groups, are these

4   groups polarized with regard to their willingness to support

5   candidates of different races, the answer is there is no

6   evidence of that here. I'm not saying that it is not a

7   possibility somewhere. I'm just saying what is the evidence

8   before the court about voting in CD-11 and illustrative

9   CD-11. And in those districts, evidence from Dr. Palmer

10   that is before the court is very clear. Those voters are

11   polarized with regard to the, their partisan preferences,

12   but they are not polarized with regard to their preferences

13   for the race of a candidate.

14   Q.   Thank you.

15   Can we pull up Dr. Palmer's reply, please?

16   MR. BUCKEY: Your Honor, can I give a copy of

17   Dr. Palmer's reply to the witness?

18   THE COURT: You may.

19   MR. BUCKEY: Appreciate it.

20   THE COURT: Thank you so much.

21   (Whereupon, the document is handed to the

22   witness.)

23   THE WITNESS: Thank you.

24   THE COURT OFFICER: You're welcome.

25   Q.   Dr. Alford, you've been handed Dr. Palmer's reply

1   report?

2   A.   Yes.

3   Q.   In Paragraphs 3 and 4 he addresses your report, do

4   you see that?

5   A.   Yes.

6   Q.   And first of all, again, does Dr. Palmer dispute in

7   any way your opinion that there is partisan polarization in

8   CD-11?

9   A.   No. Again, he does not consider it to be

10   particularly important, but he doesn't dispute that that is

11   what his data illustrates.

12   Q.   Dr. Palmer says the fact that there is partisan

13   polarization does not cancel out or supersede racially

14   polarized voting.

15   How would you respond to that?

16   A.   So we have without, again, going out into some

17   extensive multivariant modelling or talking to voters

18   directly, within the sort of data traditionally presented

19   here exactly what Dr. Palmer presented, we have the

20   opportunity to examine a prominent queue for voters. The

21   party of candidates and the race, and when we do that

22   analysis it does show something that I think is unsurprising

23   which is voters are happily partisan in partisan elections.

24   A very polarized period in American politics.

25   It also let's us see what the effect of the

1   queue of race is. And what we see here is that the evidence

2   Dr. Palmer has provided to the court does not provide

3   evidence that there is a response to the racial queue of the

4   race of the candidate. It is not the only racial queue out

5   there, the only way race might effect things. It is the

6   only one that we have with the data that has been provided

7   to the court.

8   I will say that, that this is, this fact is

9   not one that would, was -- is in any sense universal in my

10   experience with American voting. I grew up in the south in

11   the era of the voting rights act in the 60s and 70s. And

12   the idea, at that time, in the south or in my experience in

13   much of the north, that the race of a candidate was

14   irrelevant to the behavior of voters, either partisan or

15   non-partisan elections was, would be a foolish assumption.

16   The overwhelming majority of Americans in 1960

17   openly admitted in a survey to the gallop organization that

18   they would not support a Black candidate of their own party

19   for president. That proportion has disappeared so quickly

20   in the era of the Voting Rights Act that beginning, I think

21   the last time the gallop poll asked that question was in the

22   late 19 -- late 2019 because there simply was no meaningful

23   proportion of the American public that won't support a Black

24   candidate of their party.

25   THE COURT: Wouldn't you agree that the Voting

1   Rights Act of even 2019 is not the same as the Voting

2   Rights Act of 2026?

3   THE WITNESS: So --

4   MR. BUCKEY: The federal one, your Honor?

5   THE COURT: Federal.

6   THE WITNESS: In what sense? I want to make

7   sure --

8   THE COURT: There has been several Supreme

9   Court decisions that have addressed the act directly, so

10   the interpretation is different then, than it is now,

11   question?

12   THE WITNESS: I can answer that from a

13   political science --

14   THE COURT: That is what I want.

15   THE WITNESS: Better than I can say from say a

16   legal prospective. Your experience would be different

17   maybe than mine.

18   My view is, yes, that the politics, one of the

19   things that I personally believe the Voting Rights Act

20   is maybe the most successful piece of legislation in the

21   modern era of American government, which I mean since

22   1900. And there is lots of academic scholarship to show

23   that success, almost all focusing on the race of

24   candidate. Huge literature about what proportion of

25   school boards are Black before the Voting Rights Act.

1   The answer is virtually nothing. And now proportionate.

2   Proportionate state legislature are Black and Hispanic.

3   Now proportion to nothing.

4   What we've been able to track is the Voting

5   Rights Act, something unusual for social legislation,

6   profound impact exactly the thing that was so notable

7   which was the exclusion of minorities from American

8   political life at the elected level.

9   And one of the hopes of that from a social

10   science prospective is that once people saw that the

11   world didn't end when you had racial representation in

12   city counsel, when you have a Black mayor, when you have

13   a Black President, that that would then in some sense

14   take out some of the racial animus that was motivating

15   American politics.

16   Again, I think that question about, you know,

17   would you support Colin Powell for President.

18   Republicans would, democrats wouldn't. The fact that

19   the issue of race of candidates is now of much less

20   important to the public, both in public opinion surveys

21   and in at least some part of the country in this kind of

22   ecological inference analysis to me is an indication how

23   the Voting Rights Act succeeded. I don't think it is

24   necessarily the terminus of our attempt to eliminate

25   race in American politics, but I think it is really

1   important to acknowledge that it has happened and that

2   is, that that -- while there may be still some, it is

3   always some work to be done on moving forward, that it

4   is important to acknowledge we are in a different era.

5   That a finding, so recently a case in North Carolina,

6   when you said voting is racially polarized in North

7   Carolina in 1965 or 1975, it meant that, clear in the

8   discussion in the court, as well as, in public, it meant

9   that voters would not support, democratic voters would

10   not support Black democratic candidates -- they would

11   not support White, Black democratic candidates at the

12   same level. They would support White democratic

13   candidates. It was polarized in terms of that level

14   intensity. It no longer is.

15   THE COURT: Wait. Because that, every expert

16   leading up to you in this matter has equated the vote

17   concentrations of the minority voters and the trends

18   they do to the deep south, which I find to be somewhat

19   insulting, and a bit of a dog whistle for racism. And

20   so what I hear when I hear the deep south is that there

21   is still racism based on the testimony of the witnesses

22   here. And so bringing it back a little bit to the

23   context in the illustrative district that petitioners

24   put forth by their witness, is that going to be

25   enough -- I want to finish the thought properly.

1   Is that going to be enough of a percentage to

2   enable the Black and Latino voters to overcome that

3   persistent racism that everyone has inferred leading up

4   to you?

5   THE WITNESS: Two elements of that I want to be

6   really careful about. I want to address you. There is

7   a microphone over here.

8   When we talk about the persistent racism, I'm

9   not disputing the persistence of racism everywhere in

10   the world. I'm just trying to focus, if I can, on what

11   the empirical evidence provided to the court here tells

12   us about the role of race in the behavior of voters.

13   It tells us unequivocally that the party choice

14   of voters is influenced by the race. It also tells us

15   that the race or candidates is not influential. That is

16   important.

17   So we might suspect as an expert like

18   Dr. Palmer might suggest that maybe the partisanship

19   itself is somehow complicated and implicated with race.

20   That is a suggestion that might be, but it is not

21   empirical evidence for the court to evaluate in this

22   case.

23   What we have in Dr. Palmer's analysis that is

24   empirical evidence is that at least in the, in this

25   district in New York, the voters, both Black voters,

1   Hispanic voters, Asian and White voters are pretty much

2   indifferent to the race of candidates.

3   So what that leaves us with is a polarization

4   that is deeply partisan. It leaves us with a district

5   in which the minority population has not been diluted by

6   division or by packing, but rather just a district in

7   which the minority population votes democratic and the

8   district leans republican.

9   It maybe that that is a legitimate area for the

10   court to intervene. I don't want to get involved in

11   that. But I will say this, it opens up a different

12   vista for the Voting Rights Act relative to the courts

13   in the legislature than the one that I think was

14   envisioned in the Voting Rights Act politically as it

15   was passed in a bipartisan fashion.

16   This is fundamentally a case about

17   partisanship. Again, what I think is interesting about

18   our current state of political polarization is our party

19   polarization is so strong now that it has done something

20   I think that is miraculous which is actually now when we

21   look at voting behavior, what we see is extreme partisan

22   polarization. We don't see the effect of race. The

23   truth is republicans will vote, White republicans will

24   vote for a Black republican and Black democrats will

25   not, right. The race is just not as important right now

1   as that party queue for whatever that means.

2   Also, the disputes about this, I think this

3   case is a hallmark of that. The cases that are being

4   disputed under the Voting Rights Act are distinctly

5   about the current partisan disputes in the country. As

6   a political scientist, to me what this case is about,

7   this case is more about republican than my home state of

8   Texas at the legislature than it is about minorities in

9   Staten Island.

10   MS. BRANCH: Objection.

11   THE COURT: What is --

12   MS. BRANCH: This is outside the scope of his

13   report.

14   THE COURT: That is fine. I asked the

15   question. I appreciate it.

16   Your objection is noted.

17   One more question.

18   In the context of the state's constitution

19   where it cites that "district shall be drawn so that

20   based on the totality of the circumstances, racial or

21   minority language groups do not have less opportunity to

22   participate in the political process." In the context

23   of the illustrative district, does that give the

24   minority parties, regardless of what you just told me,

25   the opportunity to participate in the political process?

1   THE WITNESS: So I think my first response to

2   that is I would, I would try to think carefully about

3   whether minority democrats on Staten Island are, with

4   regard to their opportunity are differently situated

5   from Angelo democrats or Asian democrats. That is,

6   similarly situated democrats in the district that leans

7   republican are all in the same boat. Right similarly

8   situated republicans, Black republicans, Hispanic

9   republicans are better off in a district that leans

10   republican.

11   So the first thing is to be careful that we're

12   not talking about something here that disadvantages

13   minority democrats differently than it does White

14   democrats. And White democrats are very important to

15   this case, because that is the population that is being

16   moved around.

17   THE COURT: Right. We're talking about

18   Richmond County, Staten Island. Talking about Richmond

19   County not having enough of a population to create a

20   congressional district, forcing under the federal and

21   state constitution to go into another municipal district

22   to get that population, and so now the choice is where

23   are we going to get that population? We have a

24   district. Parties are bringing an action here, and the

25   question is, in their proposal, understanding the state

1 constitution as requiring us to look at race, as well

2 as, political affiliation, and address it in the context

3 of allowing those of the minority groups we've described

4 here, the Black and brown populations, to participate,

5 and because of the dynamic in Richmond County the

6 question presented is, does the illustrative district

7 give them that opportunity?

8   So I hear what you are saying about your

9 rational for voter choice, but what I'm looking at is

10 purely from a racial prospective.

11   (Transcript continues on the next page.)

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1   THE WITNESS: So the first part of your discussion

2   is really important. You're talking about Staten Island not

3   being populous enough to be a congressional district. But

4   suppose it were.

5   The logical congressional district to draw for

6   Staten Island, if it was the right size, is Staten Island.

7   But that district would, in fact, lean Republican, as least

8   that's my belief. So you would have exactly the same issue.

9   Would you need to go off of Staten Island in order

10   to find some Democrats simply because there is a minority

11   population on Staten Island? That is -- the issue here is

12   that --

13   THE COURT: But in regards to the people of color

14   is my question.

15   THE WITNESS: The illustrative plan doesn't seek to

16   add people of color to Staten Island, it seeks to add White

17   Democrats and -- and Asian Democrats to the mix of the

18   congressional district that includes Staten Island.

19   Again, it's an unusual case, not just because there

20   is not a majority-minority population in the illustrative

21   district, but because the illustrative district does not

22   seek to reunite like-minded minority voters, and, therefore,

23   let them participate. It seeks to do something else.

24   It's not apparent on the surface to me how this

25   differs at all from the two Republican districts you have on

kp

1   Long Island.

2   THE COURT: So flip it back to where we were

3   talking about -- I'll let you continue in a second -- where

4   we were talking about partisanship and the polarization in

5   Districts 6, 7, 8? 7, 8, 9? and the diverse partisanship

6   there. Is that problematic?

7   THE WITNESS: It -- again, I have -- I have no

8   either political or legal sort of dog in this fight. I'm a

9   liberal democrat. I'm a great supporter of the Voting

10   Rights Act. And I'm often more often than not, for reasons

11   I understand now, employed primarily by Republicans. That's

12   why I deal with the facts as they are, and I think they're

13   interesting facts.

14   I -- I have trouble understanding how this -- this

15   particular situation differs from any of the -- of the what

16   are now a diminished number, but still a numerous number

17   of -- in every competitive district in New York and in the

18   United States that leans Republican, there -- there is a

19   minority population. That minority population is

20   sub-majority, but not insignificant, as is true with

21   Staten Island.

22   And it becomes a question of whether is it -- is it

23   the case that any minority population -- are there -- so

24   you're probably aware, recently Haredim have become recently

25   Republican voters, in particularly Trump -- sort of part of

1   the Trump conversion. And Hassidic Jews are a recognized

2   minority group.

3   So if you have -- if you have a population of

4   Hassidic Jews that reaches 7, 8, 9 percent, as the Black

5   population does on Staten Island, do they have a right to be

6   put in a Republican district to get out of a Democratic

7   district? Because the district is going to dilute --

8   I'm -- there is -- I'm -- again, I have no disrespect for

9   what the Voting Rights Act has done, but I also recognize

10   there are limits of what it can do.

11   And it just seems to me that this -- as currently

12   written, this may be the point at which this just puts you

13   into a territory that is both so open-ended and so

14   hopelessly partisan that it really is --

15   THE COURT: Thank you.

16   Next question.

17   DIRECT EXAMINATION

18   BY MR. BUCKEY:

19   Q.   Well, Dr. Alford, the Court has covered a portion of

20   the rest of your direct examination.

21   What I'd ask is -- you referenced when you were

22   discussing with Your Honor, you referenced the unusual nature of

23   this case. Can you just -- can you tell us, again, why you see

24   this case as being particularly unusual in your 40 years of

25   experience?

1   A.   Yeah, I -- I don't want to be repetitive, but I think

2   I've covered most of the other -- the acts that I haven't talked

3   about that I do find unusual is that the drawing of the

4   illustrative district begins with a -- with basically a partisan

5   gerrymander, that is, an instruction to the map drawer,

6   Mr. Cooper, to incorporate Lower Manhattan. And that's -- we

7   can see why. That's a Democratic area. So it what appears to

8   be a partisan gerrymander.

9   MS. BRANCH: Objection, Your Honor. That was not

10   the instruction given by counsel to Dr. Cooper. I think

11   that is a mischaracterization.

12   MR. BUCKEY: He -- Dr. Alford is entitled to form

13   an opinion based upon the facts here, and in his view. And

14   he's been very clear through his entire direct testimony

15   that this is a partisan engineering.

16   THE COURT: I'll allow it.

17   A.   I don't want to mischaracterize Mr. Cooper's testimony.

18   I understood him to say that the -- the decision to include

19   southern Manhattan was an instruction from his -- from

20   the -- from the people who hired him.

21   And then apparently almost all of what Dr. Cooper

22   actually did after accepting that was to spend a great deal of

23   time trying to effect a kind of racial gerrymander in which he

24   was extremely attentive --

25   MS. BRANCH: Objection. This is a legal

kp

1313a

1   conclusion.

2   MR. BUCKEY: Can he finish his answer?

3   MS. BRANCH: He's testifying that something is a

4   racial gerrymander or partisan gerrymander. That is for the

5   Court to decide.

6   THE COURT: Sustained.

7   Next question, please.

8   MS. BRANCH: Thank you, Your Honor.

9   BY MR. BUCKEY:

10   Q.   You expressed some concern about the manner in which

11   Mr. Cooper drew the plan, I believe you were going to discuss,

12   with respect to Chinatown; is that right?

13   A.   Yes.

14   Q.   Okay. Can you explain why you found that part of this,

15   of his map drawing, to be unusual?

16   A.   So I'll say that in my experience, in listening to

17   cases like this and participating in them in courtrooms in

18   recent years, there's been an increasing question about whether

19   the illustrative districts are, in fact, racial gerrymanders,

20   possibly illegal gerrymanders.

21   I personally find that legal point deeply confusing. I

22   thought the whole idea of drawing the illustrative district was

23   to take race into account, draw a majority district. So I guess

24   I'm a little uncertain why courts sometimes think that having

25   done exactly what you're supposed to do in drawing illustrative

1   districts and using race that you have somehow run afoul of

2   something.

3   So I'm accustomed to having -- to listening to experts

4   who draw illustrative districts talk about the fact that they

5   weren't, you know, beyond just reaching 50 percent plus one,

6   they really weren't making narrow decisions about race.

7   And Mr. Cooper seemed to suggest that he was making

8   very narrow block-by-block, precinct-by-precinct decisions based

9   entirely on race or ethnicity of a group that's not a party in

10   the case.

11   I just -- again, I'm not saying that's right or wrong

12   or legal or illegal. I'm just saying it's very unusual.

13   Q.   Okay.

14   MR. BUCKEY: Thank you.

15   We pass the witness, Your Honor.

16   THE COURT: Okay. Thank you. Thank you so much,

17   Counsel, for letting me ask the questions.

18   Are you okay? Do you need a break?

19   THE WITNESS: No, no.

20   THE COURT: Okay. We'll press on until lunch.

21   CROSS-EXAMINATION

22   BY MS. BRANCH:

23   Q.   Aria Branch for the petitioners.

24   Good afternoon, Dr. Alford.

25   A.   Good afternoon.

1   Q.   My name is Aria Branch. I represent the petitioners in

2   this matter. It's nice to meet you.

3   I would like to start today with what I hope are a few

4   points of agreement.

5   You submitted one expert report in this case; is that

6   correct?

7   A.   That's correct.

8   Q.   And you respond primarily to Dr. Palmer's report,

9   correct?

10   A.   That's correct. I have a section that borrows some

11   information from Dr. Cooper's report, but both my task and my

12   report are largely responsive to Dr. Palmer.

13   Q.   And in terms of the scope of your analysis, you did not

14   analyze the compactness of the current Congressional

15   District 11?

16   A.   That's correct.

17   Q.   You did not analyze the compactness of the illustrative

18   District 11?

19   A.   That's correct.

20   Q.   You did not analyze communities of interest?

21   A.   That's correct.

22   Q.   You did not analyze contiguity?

23   A.   That's correct.

24   Q.   You didn't analyze the totality of the circumstances

25   factors in this case, correct?

1   A.   With the exception of the -- of Senate Factor Two,

2 racially polarized voting, obviously that is the central point

3 of my report. But in terms of the other so-called totality

4 factors, no.

5   Q.   And you understand, Dr. Alford, that this is not a case

6 where Petitioners are asserting claims under the Federal Voting

7 Rights Act; is that correct?

8   A.   I understand that that's not the nature of the legal

9 claim, yes.

10   Q.   So when you just mentioned the senate factor, do you

11 understand that those apply to analysis conducted under the

12 Federal Voting Rights Act, correct?

13   A.   All I know is that I've heard discussion that they're

14 within the State Voting Rights Act, there is discussion of

15 totality of circumstances. So all I can tell you is how I would

16 characterize the area that I testified about, which is what I

17 would characterize as Senate Factor Two.

18   Q.   The focus of your report was on Dr. Palmer's racially

19 polarized voting analysis, correct?

20   A.   Yes.

21   Q.   And you would agree that the geographic focus of his

22 analysis was on Congressional District 11, right?

23   A.   Yes.

24   Q.   And in your report, you didn't critique the geographic

25 focus of his analysis, right?

1   A.   That's correct.

2   Q.   I'd like to turn to talking about your methods. Both

3   you and Dr. Palmer utilized the statistical technique of

4   ecological inference, right?

5   A.   That's correct.

6   Q.   And if I refer to ecological inference as "EI," you'll

7   understand what I mean?

8   A.   Yes.

9   Q.   And you agree that EI is an appropriate methodology to

10   determine how racial groups vote; is that right?

11   A.   Yes, I do.

12   Q.   You reviewed Dr. Palmer's report in this case?

13   A.   Yes.

14   Q.   And you would agree that he is an expert on racially

15   polarized voting analysis?

16   A.   Yes, I would.

17   Q.   Let's turn to Dr. Palmer's opening report, which is

18   Petitioners' Exhibit 3, at Table 1, which is on page 10. And

19   this shows Dr. Palmer's EI estimates for the existing

20   Congressional District 11, correct?

21   A.   Did you say on page 10?

22   MR. BUCKEY: He doesn't have Dr. Palmer's report.

23   MS. BRANCH: We can give him a copy of that.

24   Do you have a copy?

25   Let me ask the court officer to please provide

1   Dr. Alford with a copy of Dr. Palmer's opening report in

2   this matter, which has been admitted into evidence as

3   Petitioners' Exhibit 3.

4   (Handing.)

5   THE COURT: Thank you.

6   MS. BRANCH: Thank you.

7 BY MS. BRANCH:

8   Q.   If you could turn -- I think it is on page 10; is that

9 correct? And that is -- that Figure 3 shows Dr. Palmer's EI

10 estimates for the existing Congressional District 11, correct?

11   A.   Correct.

12   Q.   In your report, you don't raise any critiques; you

13 don't have any quarrel with Dr. Palmer's EI results as a

14 quantitative matter, do you?

15   A.   No.

16   Q.   Your colleague, Professor Randy Stevenson, was able to

17 easily replicate the result of Dr. Palmer's analysis?

18   A.   Yes.

19   Q.   And just to be clear, you did not personally run your

20 own ecological inference analysis for your report?

21   A.   For this, no.

22   Q.   Your colleague ran the EI for you?

23   A.   That's correct.

24   Q.   And the results that he got and that you analyze in

25 your report do not differ substantively from those reported from

1 Dr. Palmer; is that right?

2   A.   That's correct.

3   Q.   There were no errors in Dr. Palmer's analysis that

4 would have impacted Dr. Palmer's conclusions?

5   A.   I can't say for certain there were no errors. But

6 there's -- the sort of fairly extensive data checks we do

7 revealed no errors.

8   Q.   So any errors that might have existed would not have

9 impacted his conclusions; is that correct?

10   A.   My conclusions -- I don't believe my conclusions will

11 be affected by any errors. But I -- again, I'm not able to

12 identify any errors, so I can't say that comprehensively.

13   Q.   And, in fact, you base some of the conclusions you drew

14 and came to in your report based on Dr. Palmer's EI results,

15 right?

16   A.   That's correct.

17   Q.   And I assume that you reviewed Dr. Voss's report in

18 this matter?

19   A.   I have seen Dr. Voss's report, yes.

20   Q.   And you were here when he testified earlier today; is

21 that correct?

22   A.   Yes.

23   Q.   So you're aware that Dr. Voss critiques Dr. Palmer for

24 not using certain variables in his analysis; is that right?

25   MR. BUCKEY: Objection. It's far beyond the scope

1   of the direct examination. We had no discussion whatsoever

2   of Dr. Voss.

3   THE COURT: Sustained.

4   Q.   You wrote in your report that Dr. Palmer relies in this

5   case on the same implementation of ecological inference that you

6   have used; is that correct?

7   A.   That's correct.

8   Q.   And that implementation of ecological inference is

9   called EI R by C; is that correct?

10   A.   That is correct.

11   Q.   And in prior litigation, you have submitted expert

12   reports where you rely on that same type of ecological inference

13   analysis; is that correct?

14   A.   That's correct.

15   Q.   And I assume you stand by those reports?

16   A.   I do.

17   MS. BRANCH: If we could pull up Table 2 of

18   Dr. Alford's report.

19   Q.   Table 2 of your report reproduces Dr. Palmer's EI

20   estimates from his -- from his Table 1, and this is for the

21   existing congressional district, correct?

22   A.   That's correct.

23   Q.   As displayed in this table, Black voters gave an

24   average of 90.5 percent of their vote to their preferred

25   candidate; is that right?

1   A.   That's correct.

2   Q.   And Black voters prefer the Democratic candidate?

3   A.   Uniformly.

4   Q.   So you would agree that Black voters have voted

5 cohesively in support of the Democratic candidate, correct?

6   A.   Very clearly.

7   Q.   And Hispanic voters gave an average of 87.7 percent of

8 their vote to their preferred candidate, right?

9   A.   That's what the table shows, yes.

10   Q.   And Hispanic voters also prefer the Democratic

11 candidate, correct?

12   A.   That's correct.

13   Q.   So you would agree that Hispanic voters have voted

14 cohesively in favor of the Democratic voters?

15   A.   That's what this table shows.

16   Q.   And White voters give an average of 26.3 percent to

17 their -- to the Democratic candidate?

18   A.   That's what the table shows.

19   Q.   Stated in the inverse, this means that White voters are

20 voting, on average, at levels of approximately 73.7 percent for

21 the Republican candidate; is that right?

22   A.   That would be correct.

23   Q.   So you'd agree that that represents at least some level

24 of cohesion among White voters, right?

25   A.   I agree.   Cohesion is a spectrum or a continuous

1   variable. I don't think there is any question that when you get

2   to 90 percent, you're talking about cohesive behavior. I think

3   when you're splitting 25 -- when you get a quarter of the

4   population voting a different way, I think you can disagree

5   about exactly where that is, but I would say, you know,

6   three-quarters of White voters are voting in this case

7   Republican rather than Democratic.

8   Q.   And so you would agree that White voters cohesively

9   oppose the Democratic candidate in CD-11 based on the estimate

10   we just discussed?

11   A.   Yeah. And I try to say it's not as cohesive as Black

12   voting. And it also is -- quite frankly, it is almost certainly

13   an overestimate of Hispanic cohesion, so I like to be -- we know

14   less about that behavior than we know about Black behavior. But

15   this number suggests that Hispanics are voting pretty

16   high -- fairly high -- moderately high degree of cohesion for

17   Democratic candidates, as were Black voters were voting very

18   cohesively for Democratic candidates.

19   Q.   So you would agree with me, based on the numbers we

20   just discussed, that different racial groups have different

21   levels of support for the two different parties in Congressional

22   District 11?

23   A.   Yes. So when I -- when I say that the voting is

24   partisan -- when there is partisan polarization here, I mean

25   that there are partisan polarization in the sense that different

1   racial groups are voting very differently for the parties in

2   these -- in these partisan contests.

3   Q.   So you don't characterize that as racial polarization,

4   you characterize that as partisan polarization?

5   A.   My concern is that when you say "characterize it," it

6   is pretty much that how do we characterize this or how do we

7   speak about it? And while I understand that at least according

8   to your assertion, Voting Rights Act isn't the issue here,

9   there -- in litigation about the Federal Voting Rights Act there

10   are two areas where we talk about the difference in the way

11   racial groups vote. One is in the initial threshold inquiry and

12   then, later, in Senate Factor Two.

13   And Senate Factor Two talks about racially polarized

14   voting. But as I understand it, meaning that in a very broad

15   sense about the role of race in voting.

16   The test -- the threshold test that we deal with

17   earlier is -- has become commonly -- although it's actually a

18   test of cohesion among minority voters, and then block voting

19   among non-minority voters. It's also often labeled merely

20   racially polarized voting, even though those are two distinct

21   inquiries.

22   So I try to be careful about not using the same term

23   for those two things. These groups are voting very differently

24   with regard to party. And so you can say, well, these are

25   different racial groups, so that's racially polarized voting.

1   But then the question is what do we mean when we say "racially

2   polarized voting"?

3   Q.   You would agree with me that Black voters and White

4   voters in Congressional District 11 are voting differently; is

5   that right?

6   A.   In partisan contests, right. So all we have here is

7   partisan contests. In partisan general elections, where there

8   is a party on the ballot, they're voting very differently with

9   regard to their partisan choices.

10   Q.   And the same with respect to Hispanic voters and White

11   voters, you agree they're voting differently in partisan

12   elections?

13   A.   We have less certainty with Hispanic voters, and

14   they're less extreme, but I would say based on the data, I would

15   suspect that Hispanic and White voters are voting differently

16   with regard to the party candidates.

17   Q.   Now, there is certainly a strong correlation between

18   partisan affiliation and partisan voting patterns and race in

19   Congressional District 11; would you agree with that?

20   A.   A correlation between race and partisan voting

21   patterns, that would follow from what we just discussed.

22   Q.   Can we turn to Petitioners' Exhibit 4. This is

23   Dr. Palmer's rebuttal report which I think we need to hand up to

24   you.

25   THE COURT: I believe he still has it.

1   Q.   Do you have the -- you have the rebuttal report?

2   A.   I do.

3   Q.   Great.

4   Turning to page 1, in paragraph 4, Dr. Palmer says that

5   "race and party are fundamentally linked in American politics."

6   Do you see that?

7   A.   Well, again, if we mean that racial groups --

8   Q.   I just -- the question was do you see that on -- on the

9   screen, in the report? If you could just answer that question?

10   MR. BUCKEY: Do you have --

11   A.   It's a very broad statement and I'm not even sure

12   exactly what Dr. Palmer means by that.

13   Q.   My question was just if you -- if you see it and

14   I -- do you have Dr. Palmer's rebuttal report?

15   A.   I see that in Dr. Palmer's -- that sentence appears.

16   Q.   Okay. And would you agree that polarization can

17   reflect both race and politics?

18   A.   It can.

19   Q.   And you would agree with me that a voter's race can

20   influence their partisan affiliation then?

21   A.   It can. Again, I want to be careful about what we have

22   evidence of here, and what is in the realm of possibility. It's

23   in the realm of possibility. But what we see here doesn't

24   provide evidence of that.

25   Q.   You also mentioned on direct that you did an analysis

1 of the race of the candidates. And I would like to turn to

2 again to Petitioners' Exhibit 4, which is Dr. Palmer's rebuttal

3 report, on page 1, paragraph 5.

4   A.   Yes. And I -- I disagree with this.

5   Q.   So turning to paragraph 5, do you see the section

6 of -- of the report where it says that "racially polarized

7 voting can occur even when the Black and Hispanic preferred

8 candidate is White"? Do you see that?

9   A.   Yes.

10   Q.   And you disagree with that?

11   A.   I don't.

12   Q.   You agree with that?

13   A.   I do agree with that.

14   Q.   And the White -- and racially polarized voting can also

15 occur when the White preferred candidate is Black and Hispanic.

16 You agree with that -- Black or Hispanic, excuse me, you agree

17 with that?

18   A.   I agree that that can be true and that I also

19 agree -- I also will say there is evidence that can show whether

20 that is true or not, and that evidence hasn't been presented

21 here.

22   It's actually the sentence above that that I disagree

23 with.

24   Q.   Okay. Let's move on.

25   If we could pull up Table 5 of your report, which

1   appears on page 11 of your report. This is related to your

2   analysis of the race of the candidate.

3   And in this table, I believe you have reproduced

4   Dr. Palmer's EI results from his Table 1 -- I'm sorry. I'm

5   sorry. I meant to pull up Table 4 of your report. Excuse me.

6   And in Table 4, you have reproduced Dr. Palmer's EI

7   results. But you've organized the contest into six contests

8   where the Democratic candidate was Black, and 13 contests where

9   the Democratic candidate was White Hispanic -- non-Hispanic

10   White; is that correct?

11   A.   That's correct.

12   Q.   So the elections where the Democratic candidate was

13   Black, those are grouped in the top section of the table?

14   A.   That's correct, that's the upper panel.

15   Q.   And the elections where the Democratic candidate was

16   non-Hispanic White is grouped in the second section of the

17   table, correct?

18   A.   That's correct.

19   Q.   And this analysis is focused, it appears, exclusively

20   on the race of the Democratic candidate; is that correct?

21   A.   That's correct.

22   Q.   So it doesn't control for or consider the race or

23   ethnicity of the Republican candidate; is that right?

24   A.   That's correct.

25   Q.   So this analysis is not limited to racially contested

1　elections, right?

2　　　A.　　That's correct.

3　　　Q.　　Did you determine or consider the Republican candidates

4　or the race of the Republican candidates in preparing this

5　chart?

6　　　A.　　No.

7　　　Q.　　So, for example, in the 2020 presidential election,

8　which is listed in your chart, both major party candidates --

9　Donald Trump and Joe Biden -- they are white; is that correct?

10　　　A.　　That would be correct.

11　　　Q.　　And you would agree with me that a voter's choice

12　between two white candidates does not tell you anything about

13　whether that voter would have preferred to vote for a Black or

14　Hispanic major candidate for president had there been one on the

15　ballot; is that right?

16　　　A.　　Yes.　So --

17　　　Q.　　Can you just answer that question?

18　　　A.　　I said yes.

19　　　Q.　　And it doesn't tell you whether the voter perhaps

20　strongly prefers White candidates; is that right?

21　　　A.　　I'm not sure in this instance what -- I'm really not

22　sure what you're asking, doesn't tell us --

23　　　Q.　　If a voter has the option to choose to vote between two

24　White major party candidates, that doesn't tell you anything

25　about whether the voter perhaps would strongly prefer White

1   candidates; is that right?

2   A.   That's correct.

3   Q.   Because the voter's only option in that contest is to

4   vote for a White candidate or not vote at all; is that correct?

5   A.   That's correct.

6   Q.   But you still included on your chart races where both

7   the two major parties were of the same race; is that right?

8   A.   That's correct. So here -- I'm taking this

9   again -- this is -- this is what Dr. Palmer tells us, which is

10   he's focused exclusively on Democratic candidates, so I'm

11   taking -- in restructuring his table, I'm also focusing

12   exclusively on Democratic candidates.

13   Q.   Dr. Alford, you're not a lawyer, correct?

14   A.   I'm not a lawyer.

15   Q.   You're not offering any legal conclusions or opinions

16   in this case; is that correct?

17   A.   I try to do my best to be aware of the context in which

18   this information is useful in my profession as a teacher, and I

19   try to -- when -- whether I'm working with local government or

20   in a court, I try to be cognizant of the factual information

21   that is helpful and try to work in that direction. But I also

22   try not to become a lawyer just because it's a legal case, and I

23   always appreciate it when judges don't try to become

24   statisticians just because it's a statistical issue.

25   I think none of us are completely successful with that,

1   but I try to, the best I can, to stay in the realm of what is

2   the factual -- what is the empirical evidence at hand in the

3   case that has been provided that the Court can look at.

4   Q.   So just to restate my question, you're not offering

5   legal conclusions in this case, right?

6   A.   That's correct.

7   Q.   And you are a political science professor, right?

8   A.   Yes.

9   Q.   And you included with your expert report your CV; is

10   that correct?

11   A.   That's correct.

12   Q.   And I reviewed your CV. As far as I can tell, you have

13   not done any academic work related to racially polarized voting;

14   is that right?

15   A.   It's not an area that I do academic work.

16   Q.   And you never published an article about EI

17   methodology?

18   A.   It's not a methodology I use in my academic work.

19   Q.   You're not an expert yourself in EI methodology?

20   A.   I'm certainly competent to use it. I've used it, I

21   understand it, but I don't use it in my own work and I don't

22   consider myself to be among the people who are -- like say

23   Dr. Voss working with Dr. King, who are sort of experts in that

24   area of methodology because it's -- quite frankly, it's not by

25   any sense a prominent methodology in political science.

1   Q.   You have -- you testified on direct that you've been

2 doing this type of work for over 40 years and you've offered

3 reports and testified in a significant number of redistricting

4 cases, right?

5   A.   Correct.

6   Q.   And in almost all of those cases you have opined on

7 racially polarized voting?

8   A.   Yes, I would say that's correct.

9   Q.   And in at least some of those cases, you have offered

10 the same opinion that you offer in this case, which is the

11 differences in voting between racial groups are the result of

12 partisan rather than racial polarization, yes?

13   A.   That's correct.

14   Q.   Is it fair to say, Dr. Alford, that in several recent

15 cases, courts have not adopted your conclusion?

16   A.   I would say in recent cases, some courts have valued

17 and endorsed my opinions, my methodology, and have utilized it.

18 In other cases, courts, I think, have taken a position similar

19 to Dr. Palmer's, that my work is not of any value to them in the

20 legal decision they need to make. That's a -- a legal -- I

21 respect that opinion.

22   If this is not important to the legal decision the

23 Court faces, then the Court should ignore it. But I don't think

24 that means that the Court shouldn't have that information.

25   (Senior Court Reporter Karen Perlman was replaced

1   by Senior Court Reporter Monica Hahn.)

2   (Transcript continues on the following page.)

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1   Q.   You testified in Robinson v. Ardoin in Louisiana in

2   2022, correct?

3   A.   Correct.

4   Q.   That was a racial vote dilution in the context of

5   congressional redistricting?

6   A.   That's correct.

7   Q.   And you testified in that case that while voting

8   in Louisiana polarized between Black and White voters that

9   polarization was attributable to partisanship rather than

10   race; is that right?

11   A.   That's correct.

12   Q.   And that is quite similar to your opinion in this

13   case, right?

14   A.   That's correct.

15   Q.   And the court did not credit that opinion as

16   helpful, did it, Doctor?

17   A.   They did not.

18   Q.   Can we pull up a portion of the Robinson case. If

19   we can go to, I believe it is 75 of the PDF, and there this

20   is a from Robinson v. Ardoin, and there it says, "Dr. John

21   Alford testified as an expert for the defendants on

22   racially-polarized voting. He does not dispute that voting

23   in Louisiana is polarized as between Black and White voters.

24   Rather, it is his opinion that polarized voting in Louisiana

25   is attributable to partisanship, not race. The court does

1   not credit his opinion as helpful, as it appears to answer a

2   question that Gingles II does not ask and in fact squarely

3   rejects, namely why Black voters in Louisiana are

4   politically cohesive."

5   Do you see that?

6   A.   Yes.

7   Q.   Have you changed your methodology since that

8   decision was issued?

9   A.   So I, again, I take some pride in this. I have not

10   changed my methodology. If I was changing my methodology

11   every time I found that a court was unhappy with the resolve

12   that would suggest I was something of a charlatan. So I do

13   exactly the same method, and I do that even knowing that

14   some courts find it irrelevant.

15   I would have to say in this particular context

16   that you are quoting here, I'm not sure I disagree at all

17   with the judge in the sense that is it relevant to know what

18   the source of Black-voter cohesion that Gingles II,

19   Black-voter cohesion is. I don't think I'm saying much of

20   anything about that at all. I think it is important from my

21   view, it is important for the court to understand what is

22   motivating or what is, what we can say is empirically

23   connected to the behavior of White voters that is Gingles

24   III. I think you start getting into what I'm talking about.

25   But also aware in multiple courts, including courts that

1   found my work to be very helpful --

2   Q.   Okay. Let's talk about some --

3   MR. BUCKEY: Can we let the witness answer?

4   Objection, your Honor. The witness was not

5   done answering.

6   MR. MOSKOWITZ: I join in that objection.

7   THE COURT: Let's let him finish.

8   MS. BRANCH: Sure.

9   A.   So you are quite correct that the court is saying

10   that this is not relevant to Gingles. And in North Carolina

11   in a series of recent cases where the court endorsed and

12   relied on this exact same analysis that I have not changed

13   either between Louisiana and North Carolina or North

14   Carolina to New York, the court found it very helpful,

15   useful, incorporated in their opinion precisely because they

16   said the importance is to address, factor two, the totality

17   of the circumstances, and that it may not be helpful at all

18   to addressing the Gingles test. That is an area for lawyers

19   to deal with. I don't know where this matters in the

20   inquiry.

21   My belief is that it is important for the court

22   to be aware of it. I don't think in any way that the court

23   here is saying that either as a empirical matter or as a

24   legal matter that it makes no difference to the totality of

25   the circumstances.

1   Q.   You testified also in Georgia redistricting case in

2   2022; is that correct?

3   A.   That's correct.

4   Q.   Was that a Section II case?

5   A.   Yes.

6   Q.   Let's pull up that opinion from Alpha Phi Alpha

7   Fraternity v. Raffensperger. Go to Page 7 9 of that

8   opinion.

9   Do you see where it says, "Dr. Alford's was tasked

10   with responding to Dr. Palmer's expert report in providing

11   expert opinions about the nature of polarized voting in

12   Georgia. Dr. Alford assumed that Dr. Palmer's ecological

13   inference analysis of the existence of racially-polarized

14   voting was sound because he knows from his past work that

15   Dr. Palmer is competent in performing such analyses.

16   However, he raised concerns that Dr. Palmer's results were

17   more attributable to partisanship rather than race;" is that

18   right?

19   A.   I accept your reading of it. I can't see any of it

20   from here, but I accept that you're reading it correctly.

21   Q.   Okay. We can hand you a copy of the opinion.

22   A.   That would be helpful. Thank you.

23   MS. BRANCH: If I could ask the court officer

24   to provide Dr. Alford with a copy of this opinion?

25   THE COURT: Thank you.

1   (Handed to the witness.)

2   THE WITNESS: Thank you. What page should I be

3   on?

4   Q.   I think it is Page 79 of the printout. It is also

5   on the screen that I just read.

6   A.   Sorry. Did you say Page 7.

7   Q.   79. Maybe 64. I apologize. The printout, the

8   number pagination is off?

9   A.   Okay.

10   Q.   Do you see that section of the opinion?

11   A.   Yes.

12   Q.   And do you see immediately after that part of the

13 opinion the court says that it cannot credit your testimony;

14 is that right?

15   A.   That is what they say.

16   Q.   About halfway down that paragraph the court wrote,

17 "nor is there any evidence aside from Dr. Alford's

18 speculation that partisanship is the cause of racial

19 polarization identified by Dr. Palmer."

20   Is that what the court found from that part of the

21 opinion?

22   A.   That is what the court found and that is incorrect.

23   Q.   And I would like to go to the next paragraph which

24 is still on Page 12 of that opinion.

25   Here, the court notes that "other courts have

1   discounted Dr. Alford's testimony for similar reasons," and

2   it provides a string cite of nine other cases supporting

3   that statement, do you see that?

4   A.   Yes.

5   Q.   You've also testified in redistricting cases in

6   New York; is that right?

7   A.   That's correct.

8   Q.   You testified in NAACP Spring Valley Branch v. East

9   Ramapo School District; is that correct?

10   A.   That's correct.

11   Q.   That was a case where plaintiff successfully proved

12   racial vote dilution in school Board of Education elections;

13   is that right?

14   A.   That's correct.

15   Q.   Let's pull up a portion of that opinion. I can

16   provide you with a copy of that.

17   (Handed to the witness.)

18   MS. BRANCH: Thank you.

19   THE WITNESS: Thank you.

20   Q.   And in Paragraph 18 of that opinion there is the

21   section of the opinion where the court accounts your

22   credentials and on the last sentence of the paragraph it

23   states, quote, "your testimony while sincere did not reflect

24   current established scholarship and methods of analysis in

25   racially-polarized voting and voting estimates."

1   Do you see that?

2   A.   I'm getting to it.

3   Q.   It is also on the screen if that is helpful.

4   A.   Yes.

5   MS. BRANCH: No further questions. Thank you.

6   MR. BUCKEY: We are all set.

7   THE COURT: Okay. Thank you for your

8   testimony.

9   THE WITNESS: Thank you.

10   THE COURT: You may step down. Please be

11   careful of the steps on your way down.

12   (Whereupon, the witness steps off the stand.)

13   THE COURT: You want to break for lunch.

14   MR. TSEYTLIN: Your Honor, could we convene by

15   2:15 in case your Honor has questions for the last

16   witness? I've negotiated one hour, one hour. Some

17   chance we may have a good number of questions.

18   THE COURT: I think we're on track. I feel

19   confident we can complete before close of business

20   today.

21   So let's come back at two.

22   MR. TSEYTLIN: Great.

23   THE COURT: Open up, get started sharply as

24   soon as everybody is ready.

25   (Whereupon, there is a luncheon recess taken

1   and the case adjourned to 2:00 p.m.)

2   A F T E R N O O N   S E S S I O N

3   THE COURT: Call the witness.

4   (Whereupon, the witness takes the stand.)

5   THE COURT OFFICER: Please remain standing.

6   Do you swear or affirm the testimony you are

7   about to give is the truth, the whole truth and nothing

8   but the truth?

9   THE WITNESS: I do.

10   J O S E P H   B O R E L L I,

11   called by the Respondent, after being duly sworn, testified

12   as follows:

13   THE COURT OFFICER: Thank you. Have a seat.

14   For the record, please state your full name and

15   address.

16   THE WITNESS: Joseph Borelli. 291 Shirley

17   Avenue, Staten Island, New York 10312.

18   THE COURT: Good afternoon.

19   DIRECT EXAMINATION

20   BY MS. DIRAGO:

21   Q.   Mr. Borelli, you stated your address. What borough

22   do you live in?

23   A.   Staten Island.

24   Q.   How long have you lived there?

25   A.   Forty-three years and six months.

1   Q.   Have you spent your entire career there?

2   A.   Yep. Obviously, with the exception of college I

3 was a dorming student but, yes, the entirety of my career

4 was spent working on Staten Island for the people of Staten

5 Island.

6   Q.   The court mentioned your elected position.

7   Can you go into detail about that?

8   A.   Yep. In 2012, I was elected to serve the 62nd

9 Assembly District which comprises the lower half, southern

10 half of Staten Island, third roughly of Staten Island.

11   Then in 2015, I was elected to serve the City

12 Council in the 51st District which is the lower third of

13 Staten Island, as well.

14   Q.   Are you also a professor anywhere?

15   A.   Yes. I'm a lecturer at CUNY. Done that for

16 nearly 20 years. 2007 is the year I started. And I teach

17 courses on political science ranging from American

18 government politics to classes City Hall, Albany, that sort

19 of thing.

20   Q.   So as you know you are here to testify about

21 Staten Island. Have you written any books about Staten

22 Island?

23   A.   Yes. I wrote two. The first being a history of

24 Staten Island during the American Revolution, which was

25 notable time for Staten Island. The second was about

1   Staten Island in the 19th century.

2   Q.   And can you talk a little about the process of your

3   research that you did for those books?

4   A.   Yeah. For those I relied on primary documents

5   going back to the colonial records of Dutch New Amsterdam,

6   primary records of the American revolution. Obviously, as

7   you got forward toward the 19th century, newspaper sources

8   became more prevalent and more heavily relied upon.

9   In addition to that, there is a wealth of

10   literature on the history of not just New York City, but in

11   particular on Staten Island.

12   Q.   Have you written anything else about Staten Island?

13   A.   Yep. I write frequently op-ed's, editorials. I

14   also did my graduate research on the political history of

15   Staten Island in the later half of the 20th Century which is

16   significant for our purposes here. I've also written on

17   Staten Island secession, both politically and analytically

18   on different political topics that affect the borough.

19   MS. DIRAGO: Your Honor, at this time I would

20   like to tender Mr. Borelli as expert of the history

21   Staten Island and current conditions.

22   THE COURT: Any objection? It is stipulated

23   to.

24   MS. BRANCH: No objection.

25   THE COURT: Since there is no objection, you

1   can move forward.

2   Q.   Have you been engaged as an expert, in this matter?

3   A.   Yes, ma'am.

4   Q.   And who retained you?

5   A.   Troutman Pepper Locke.

6   Q.   Are you being paid for your services?

7   A.   I am.

8   Q.   Does your payment depend at all on the outcome of

9 this case?

10   A.   No.

11   Q.   Does it depend on the opinions that you render for

12 this case?

13   A.   No.

14   Q.   Did you render a written report in connection with

15 this work?

16   A.   I did.

17   MS. DIRAGO: I would like to introduce into

18   evidence your expert report.

19   THE COURT: Also without objection?

20   MR. LALLINGER: No objection.

21   THE COURT: Report is in evidence.

22   MS. DIRAGO: That is IRX02.

23   Q.   Mr. Borelli, what were you retained to do by the

24 Intervenor Respondents, in the case?

25   A.   Analyze the petitioners complaint, as well as,

1   primary the report of Dr. Sugrue.

2   Q.   Did you look at the NYVRA totality of the

3   circumstances factors?

4   A.   Yes.

5   Q.   As part of your analysis, did you consider whether

6   Staten Island has more in common with Brooklyn than lower

7   Manhattan?

8   A.   I did.

9   Q.   Did you also provide a historical analysis of

10   Staten Island?

11   A.   I did.

12   Q.   Can you describe your process of research you did

13   for your report?

14   A.   Sure. Obviously, it relies on a great deal of

15   newspaper sources. It also relies on a great deal of

16   government data, both from the census sources, American

17   community survey, government publications through the city

18   and state governments. Certainly, a host of secondary

19   literature on the history of the region, New York. But

20   then also literature that discusses particularly Staten

21   Island.

22   Q.   Okay. Any particular literature that stood out to

23   you and that you relied on more than any others?

24   A.   Yeah, I think there is some great works written by

25   Professor Rich Flanagan and Dan Kramer. They wrote a

1   political history of essentially the second half of the

2   20th century and how Staten Island basically developed as a

3   borough after the Verrazzano Bridge was built, which is kind

4   of a seminal, noteworthy the point in the history of Staten

5   Island.

6   Q.   Do you have any personal connection with them?

7   A.   Yep. Rich is my department chair and my advisor on

8   my graduate research. Dan Kramer before he passed away

9   actually gave me all the notes to that book, handwritten

10 notes while I was doing my graduate research. He was a

11 lovely man.

12   Q.   Did Dr. Sugrue rely on that resource, as well?

13   A.   He did. Not frequently. Not nearly enough. And I

14 think because it doesn't paint the picture of the -- it

15 doesn't paint the picture of Staten Island that I think he

16 was seeking to paint.

17   Q.   So I want to first -- if you can, please turn to

18 Page 3 of your report. I want to go through briefly the

19 summary of conclusions and then we'll take them one by one.

20 I know we are getting near to the end of the day on our last

21 day of trial. I'm going to try to speed things up. So like

22 I said, Page 3 lists your summary of conclusions.

23   Can you just summarize your first conclusion for

24 the court?

25   A.   I mean, basically that Staten Island's unique

1   demographics and physical geography and its relationship to

2   the other four boroughs doesn't do a great job of connecting

3   the communities of interest anywhere but Brooklyn.

4   The other boroughs, specifically Manhattan have

5   little in common with Staten Island.

6   Q.   What about your second conclusion?

7   A.   He basically says that Staten Island's history is,

8   you know, full of racial appeals and full of segregation,

9   and he talks about Staten Island's history going back to

10   periods before the civil war. And I think he leaves out,

11   deliberately, a lot of context about the history of the

12   abolition movement, nationally and locally, and I think that

13   was deliberately done to paint a picture of Staten Island

14   that does not exist.

15   Q.   When you say he, referring to --

16   A.   Dr. Sugrue, yes.

17   Q.   What about your third conclusion?

18   A.   Yeah, his premise that blacks and Hispanics were

19   summarily excluded from participation in Staten Island

20   politics, I think he ignores the fact that a third of our

21   elected legislators are people of color. I think he ignores

22   the fact that our member of Congress, Nicole Malliotakis and

23   former assembly member is a very proud Hispanic person,

24   someone who touted throughout her career her Hispanic

25   heritage, and it, um, I think he ignored that purposefully.

1   Q.   Okay. And your next conclusion, I think we are

2   onto the fourth conclusion?

3   A.   The points he made about issues that blacks and

4   Hispanics had with voting through literacy tests and

5   measures like that are not unique to Staten Island. He

6   presents it as unique to Staten Island. These are factors

7   and challenges that impact everyone of the states

8   congressional districts, everyone of the assembly districts.

9   I don't think he presents any justification or rational why

10   Staten Island uniquely is a, um, problematic for that

11   population when it comes to that, considering things like

12   literacy tests were banned 50 years ago.

13   Q.   Okay. Your next conclusion?

14   A.   Dr. Sugrue provides no support or evidence that

15   Blacks or Hispanics were -- excuse me, Hispanics were

16   ineligible to vote or had difficulty voting unique to Staten

17   Island.

18   Q.   And your sixth conclusion?

19   A.   That his examination of discrimination in things

20   like housing, disparate outcomes in income and education,

21   he failed to include the host of evidence that shows that in

22   many ways Staten Island is a better opportunity for people

23   of color to achieve educational outcomes that are favorable.

24   Certainly to achieve homeownership. He fails to actually

25   address any of that.

1   Q.   Okay. And next?

2   A.   Um, he fails to talk about in his one-sided history

3   of Staten Island any efforts to eradicate or challenge race

4   and racist ideas, discrimination, we have a rich history of

5   that fails to address any of that in terms of how he framed

6   the recent political history of Staten Island.

7   Q.   Okay. Your next conclusion?

8   A.   Discussion of racial appeals in political campaigns

9   is often taken out of context. It doesn't discuss several

10   races. It also has an unfair and a-historic description of

11   the secession movement. And in many ways it doesn't really

12   meet his own standard of what a racial appeal is.

13   Q.   And finally what is your last conclusion?

14   A.   That taken as a whole, essentially Dr. Sugrue did

15   not paint a picture that there is any unique circumstances

16   that would make Staten Island not a community of interest

17   with southern Brooklyn where it is, and that the southern

18   portion of Manhattan, lower Manhattan would serve the

19   population better.

20   Q.   Okay. Great. In the interest of time, I'll take

21   the factors a little out of order. We'll start with the

22   last one.

23   There has been a lot of discussion during this

24   trial about the similarities and differences between Staten

25   Island and the lower part of Manhattan, and then the

1   Brooklyn communities.

2   So are you familiar with the real estate pattern of

3   people who move to Staten Island?

4   A.   Yes, and I included that, a little portion of that

5   in my report.

6   Now, it is not fair to say that everyone who

7   moves out of Brooklyn moves to Staten Island. But just

8   about every single person who moves to Staten Island not

9   only moves from Brooklyn, but moves from the specific

10   neighborhoods in Brooklyn that are currently represented by

11   New York -- and I pointed that out in my report, came from

12   a real estate survey, and it showed that 92 percent of home

13   buyers that weren't Staten Islanders already came from

14   Brooklyn. This is long established pattern. I included

15   some notations of articles in New York Times and other

16   publications talk about migratory pattern that happened in

17   the 80's and 90's. My parents were part of this migratory

18   pattern. They were like third generation Italian home

19   owners. Their grandparents didn't own a house so they were

20   the first homeowners and they bought property on Staten

21   Island in the late 1970's and we've seen that pattern stay

22   the same regardless of what ethnic community actually

23   occupies that portion of southern Brooklyn.

24   So now in this portion of southern Brooklyn

25   your Arab population, you have Chinese, you have Jewish, you

1 have Russian speakers and these are the people who are now

2 primarily buying homes in Staten Island. I say this

3 anetodermally. I get a knock on my door all the time from

4 people, real estate brokers who portend to be able to broker

5 buyers from communities that I may not have access because

6 of language barriers and things like that.

7   Q.   What about lower Manhattan, who moves to lower

8 Manhattan?

9   A.   In my experience, typically folks moving from other

10 parts of the country, if not other parts of the world. It

11 is more transitory population. It certainly mostly renters,

12 people who are renting homes, not necessarily plopping their

13 life savings on a house intending to live there a long

14 period of time. That is wonderful. That is a great part of

15 the fabric of New York. That is why many people come to the

16 city. It is not the same population as generational New

17 Yorkers who are plopping down their life savings on buying a

18 home.

19   Q.   Can you talk about the homeownership rates Staten

20 Island and vis-a-vi Manhattan?

21   A.   Yeah, I mean, if you refer in the report I give you

22 exact numbers but Staten Island homeownership rates are the

23 highest, double, more than double the rest of the city.

24   The majority of Staten Islanders do own their

25 own homes. This is unlike lower Manhattan where the

1   majority of residents in lower Manhattan are renters. It is

2   similar to the Brooklyn portions of New York 11 that exist

3   now where a majority of those folks are living in homes that

4   they own.

5   THE COURT: Do you think the homeowners in

6   Brooklyn like the homeowners in Staten Island commute

7   into lower Manhattan to work?

8   THE WITNESS: I'm glad you asked that. I did

9   have time to review the testimony of one of the previous

10   experts, and he made the case that there is some

11   similarity between lower Manhattan and Staten Island

12   because people from Staten Island, I think he said there

13   were 60,000 of them, I assume is the correct number,

14   that they commute to Manhattan. If that were the case

15   then the majority of the region would be a community of

16   interest with Manhattan.

17   I mean, our entire transportation network is a

18   spiderweb that all seeps into the two central business

19   districts of midtown and lower Manhattan. So that would

20   be the same as saying that, you know, Westchester County

21   is a community of interest in Manhattan. I don't know

22   the data, but I'm pretty sure the majority of people who

23   live in Westchester and commute to work are commuting to

24   Manhattan. So that makes us more similar to an adjacent

25   borough, the southern portion of an adjacent borough

1   where the majority of people who aren't working in their

2   immediate neighborhood are commuting into lower

3   Manhattan or midtown. That is different from the

4   majority of people that live in Manhattan who have you

5   shorter commutes and likely work in the borough.

6   THE COURT: You are using, I won't belabor it,

7   I know time is short, but if you are talking about, as

8   they've been described in the past these driveway

9   neighbors.

10   THE WITNESS: Yeah.

11   THE COURT: Um, being the community of interest

12   between Brooklyn and Staten Island, but they all work in

13   lower Manhattan, um, let's focus on the region rather

14   than compare it to Westchester, because I while I agree

15   with your premise, it is as they say apples to oranges

16   so to speak, because on Staten Island we don't have

17   enough to make a congressional district.

18   THE WITNESS: Sure.

19   THE COURT: We have to go somewhere, and the

20   question is where does the center of gravity take us to

21   do what is right for the people not only -- to have the

22   representation in Congress that serves them, so the

23   reason why I'm trying to get to what are we talking

24   about here is, how is that congressional member going to

25   help the community?

1   THE WITNESS: I'm glad you asked. I'm glad you

2   framed it that way, because it is too generic to say

3   that all commuter neighbors are the same.

4   New York 11, the Brooklyn portion and Staten

5   Island are extremely similar. The best way I can

6   illustrate that is by talking about the issues that

7   matter most in terms of peoples political frustrations

8   and anger with their government.

9   So I was the author of probably five or six

10   op-ed's about property tax reform. Property tax reform

11   is a tremendously important issue for people in these

12   driveway communities. And the person I co-authored not

13   just legislation on this top, on other real property

14   formula changes, but specifically on the property tax

15   formula was the democratic council member from Bay Ridge

16   Brooklyn and the democratic council member from sort of

17   Graves End and Bath Beach. Those were staunch allies

18   and had a very similar idea of what should be done to

19   address that. Probably had a similar way of framing

20   that in terms of how strong of an issue that was for

21   their constituents.

22   Same thing with congestion pricing and other

23   car issues. You have the member of the city council,

24   the state legislature from southern Brooklyn united in

25   their opposition to congestion pricing, which was a hot

1   topic recently.

2   Conversely, you have members of the state

3   legislature, city council, et cetera in Manhattan,

4   specifically lower Manhattan who talk about cars as to

5   use their quote, "breaking the car culture" that was

6   speaker Corey Johnson who was a Manhattan council

7   member. That was his big phrase phrase, we are going to

8   break the car culture. That is, you know, alien to

9   people on Staten Island and southern Brooklyn who rely

10   on their cars to get their kids to school, go the

11   grocery store, et cetera.

12   This is a such a disparate-issue set that are

13   the focus of legislatures from these two communities

14   that it is almost incredible to think that there would

15   be more similarity in the issues, the political issues

16   legislatively focus on between Staten Island and

17   Manhattan legislatures and Brooklyn and Manhattan

18   legislatures.

19   THE COURT: Members of Congress don't deal with

20   land use. That is your local legislators, and they have

21   their districts. And those can be compact and

22   contiguous within Richmond County.

23   Now we're talking about going outside. Let's

24   talk about the federal issues that have to be

25   considered, infrastructure, the port.

1   THE WITNESS: Yeah.

2   THE COURT: The funding of the ferry. So,

3   those types of federal aid, where is the community of

4   interest there?

5   (Transcript continues on the next page.)

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1   THE WITNESS: So you get a good example. You

2   offered me an opportunity to give a good example. The

3   tolling on the Verrazzano Bridge has been the subject of a

4   lot of, you know, not just press releases but lawsuits,

5   federal laws, Congressman Guy Molinari, who was a

6   congressman from Staten Island who represented parts of

7   Staten Island and Brooklyn, he banned a certain formula of

8   tolling, basically making one-way tolling required so that

9   the cars wouldn't stack up and pollute the community.

10   And so I don't think it's fair to say that -- that

11   just because issues are locally based, they don't have

12   federal ramifications.

13   We had federal Representative Malliotakis who

14   joined lawsuits, if not initiated lawsuits, about congestion

15   pricing. Congestion pricing is a federal issue.

16   And, you know, the members of Congress, you know,

17   specifically Rep Goldman, Rep Nadler were all on the

18   opposite sides of the issues.

19   THE COURT: Thank you.

20   DIRECT EXAMINATION

21   BY MS. DIRAGO:

22   Q.   So this kind of plays into what I was going to ask you

23   next. The zoning districts between Manhattan and Staten Island,

24   can you talk about the differences or similarities there?

25   A.   Yes. So Lower Manhattan has the highest density FAR,

kp

1   which is floor area ratio, it's how people -- it's how we say

2   how big and wide and -- footprint of buildings.

3   So not only does Lower Manhattan have some of the

4   highest-density zoning regulations in the city, but it has some

5   of the highest-density zoning regulations in the United States

6   of America.

7   I mean, it's remarkable, right? We have the tallest

8   building, The Freedom Tower. We have beautiful buildings

9   that -- you know, the Gehry building that was just built across

10   from City Hall. We have the Woolworth Tower -- the tourists

11   comes here for the skyscrapers.

12   The Woolworth Tower, it's a cathedral in the sky. You

13   got to look at it. If you ever want to see it -- I know it's

14   not pertinent to this, but I'm going off an a tangent.

15   The point is that people come here to see the

16   skyscrapers, and that is reflective in the policy, the zoning

17   policy.

18   Now, Staten Island, some of the higher-density areas,

19   of which there are very few are R-5, which the FAR is five or

20   six times less than the FAR in these C-6 districts that are in

21   Lower Manhattan. So it's -- it's not the same. These districts

22   are similar to the districts that are in south Brooklyn, in

23   southern Brooklyn, in Bay Ridge, Bensonhurst, Bath Beach. These

24   are all one- to three-family homes, what you call driveway

25   communities.

1   We call them driveway communities because the zoning

2   code requires parking spots because the policy acknowledges the

3   difference.

4   In fact, if you read the New York City Zoning Guide,

5   the layman's guide on the website, it even starts by saying

6   these high-density C-6, C-8 districts are zoned this way because

7   of the ability of people to get there with mass transit and they

8   don't need parking.

9   THE COURT: When we're drawing congressional lines,

10   we should care about council issues?

11   THE WITNESS: No, you should care about the

12   similarities and issues that affect the residents. People

13   in Manhattan have much different issues than people in

14   Staten Island. Those issues are much more similar to those

15   felt by folks in southern Brooklyn, and probably southern

16   Queens. There are other places in the city where it would

17   fit better.

18   THE COURT: Should we draw southern Queens into a

19   Staten Island district too?

20   THE WITNESS: I mean, it would theoretically make

21   more sense than this.

22   BY MS. DIRAGO:

23   Q.   And let's talk about the ferry a little bit. Does the

24   ferry, the Staten Island Ferry, carry cars?

25   A.   It doesn't.

1   Q.   And does that have an impact on who comes from

2 Manhattan to Staten Island?

3   A.   To some degree. It makes it a little bit more -- less

4 convenient for people, depending on where they live on

5 Staten Island.

6   Q.   And what is the -- what's the difference between taking

7 the ferry to Manhattan versus the Verrazzano Bridge or the

8 express buses?

9   A.   There's sort of a popular myth out there that the ferry

10 is free. And while the ferry itself is free, almost no one -- I

11 think the number is down to 1 or 2 percent of people walk on the

12 ferry and walk off. Very few people live within walking

13 distance of the Saint George Ferry Terminal. It's not -- it's

14 surrounded by parking lots, offices, and a railroad track.

15   If you don't take a one-seat ride on the ferry, you are

16 paying the MTA for that -- for that ride. Staten Islanders

17 swipe their MetroCard when they enter a bus, or when they leave

18 the Staten Island railroad station at Saint George. And then

19 there, they're oftentimes taking a third seat, whether it be a

20 subway or a bus. But they're usually taking a third-seat ride

21 from Whitehall Street to take either, you know, the A and C line

22 or the N -- whatever line they're taking.

23   So, for example, if I were to take public transit to

24 come here, it would be a four-seat ride because, like most

25 Staten Islanders, I don't live within walking distance -- unless

1   I want to walk through the woods of a train station. So I would

2   drive to my park and ride, about a mile and a quarter, I would

3   park, I would take the Staten Island railroad, I would get off

4   of the Staten Island railroad, and take the Staten Island Ferry,

5   and then take, in this case, probably the N line to here.

6   Q.   Okay. So just -- are you saying that if -- just

7   because Staten Islanders may go to Lower Manhattan by the ferry,

8   do they necessarily work there, in Lower Manhattan?

9   A.   No. I mean, there's no reason to -- to indicate that

10 they specifically work in that part. I mean, there are two

11 major central business districts in New York, in Midtown and

12 Lower Manhattan.

13   You know, there is no data that I've seen -- I'm sure

14 it's available -- to say exactly where they work. I'm not sure

15 of that.

16   However, we also have to take into account that a lot

17 of Staten Islanders are municipal workers, cops, firemen

18 teachers. So many of them will work in particular precincts,

19 particular firehouses, schools that aren't necessarily in the

20 southern extreme of Manhattan Island.

21   Q.   Okay.

22   A.   And that's getting less every year. As more office

23 buildings in Lower Manhattan are converted into condos -- in

24 fact, Lower Manhattan leads the country in places that we can do

25 this because Lower Manhattan has an older building stock, where

kp

1   the buildings -- just like this building, has more windows.

2   1960s on, buildings are steel and glass, you can't really

3   partition them for condos. The older buildings in Lower

4   Manhattan, you can.

5   Q.   I want to switch gears a tiny bit. Can you attest to

6   the religious differences between Manhattan and Staten Island?

7   A.   Well, I mean -- excuse me. We're seeing -- similar to

8   the migratory pattern of people, we're seeing that there are

9   religious institutions that were prevalent in Brooklyn over the

10   past couple of years, we're seeing -- specifically mosques,

11   we're seeing mosques now become more prevalent on Staten Island.

12   And this is as a result of the different and diverse

13   people that are moving from that portion of Brooklyn. So we see

14   the fact that, you know, certain denominations of religions are

15   moving here, they're bringing their previous Brooklyn-based

16   religious institutions with them.

17   Q.   I would like to talk a little bit more about the

18   demographics on Staten Island.

19   Did Dr. Sugrue's report discuss Asians on Staten Island

20   in his report?

21   A.   It did not.

22   Q.   And did that concern you?

23   A.   It did. So Asians are -- after Hispanics and

24   Whites -- the third-largest population on Staten Island. They

25   are a -- a very vibrant part of Staten Island and they're

1   located all over Staten Island. They're widely dispersed.

2   Their index of dissimilarity is 32 or 34. It's in the

3   report. And it shows that Staten Island is a welcoming and

4   thriving place for this population.

5   And it's not just Chinese people which are coming over

6   lately in larger numbers. There's been a historic Korean

7   population, and then moving into sort of Southeast and Southern

8   Asia, there's been significant Bangladeshi; Sri Lankan, we have

9   a great Michelin Sri Lankan restaurant for many years; India;

10   Pakistan; even moving further to the west, we have a large

11   growing Arab community. Again, directly related to families

12   moving into Bay Ridge, being priced out of Bay Ridge, and moving

13   to Staten Island.

14   Q.   Actually, I would like to pull up the map on page 9 of

15   your report. And do you recognize this map?

16   A.   Yes.

17   Q.   What is this showing?

18   A.   It is showing the percentage of Asian non-Hispanic by

19   census tract.

20   Q.   And can you point out where is the Staten Island

21   Expressway?

22   A.   It is the white line. It's probably marked 278. I

23   can't see that -- yeah, 278. It's going from east to west or

24   west to east.

25   Q.   And so can you tell me what you see there, vis-à-vis

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1   the white line or the Staten Island Expressway and the

2   disbursement [sic] of Asians?

3   A.   Well, it confirms visibly what I said, that the Asian

4   population, which is the second-largest non-White group in

5   Staten Island is widely dispersed and is, you know, occupies

6   residences in every part of this borough.

7   Q.   And I know you read Dr. Sugrue's report. Did you have

8   a -- did you have time to read his testimony when he testified?

9   A.   I did.

10   Q.   And I think you'll remember he referred to the

11   Staten Island Expressway as the Mason-Dixon Line?

12   A.   Yes.

13   Q.   What are your opinions on that?

14   A.   That is patently offensive to use a term from the

15   Antebellum South to describe his idea of what Staten Island was.

16   I think it's offensive as a Staten Islander. I think it

17   belittles people. And I think it is undermined by the visual

18   evidence that is there.

19   Q.   Does it ring true to you?

20   A.   No. There's a wide variety of diversity. There is a

21   lot of flavors across Staten Island. And we see more and more.

22   You know, 30 years ago, 40 years ago, we were less diverse.

23   There is no secret; the data plays that out. But we're seeing

24   time and time again, as different groups move in, they're

25   spreading their -- they're spreading out their footprint across

kp

1   the borough.

2   Q.   So as someone who has lived and worked in

3   Staten Island, I think you said 40-something years, is

4   there -- I don't know -- two Staten Islands, an us and a them?

5   A north and a south?

6   A.   Yes, outside of the local high school football rivalry,

7   there isn't.

8   Q.   All right.

9   MS. DIRAGO: I would also like to pull up page 15.

10   Q.   There is a map on page 15 of your report. Do you

11 recognize this map?

12   A.   Yes.

13   Q.   And what is this showing?

14   A.   This is the non-Black/non-Hispanic population in

15 New York City.

16   Q.   Okay. And what are you showing here with respect to

17 Lower Manhattan?

18   A.   That the population of Blacks in Lower Manhattan is

19 negligible, it's nonexistent.

20   Q.   So the illustrative CD-11, is that trying to unite a

21 population on the north shore of Staten Island with Lower

22 Manhattan?

23   A.   Could you repeat that? I couldn't hear with the

24 coughing.

25   Q.   Yeah. So the illustrative -- the map that petitioners

1   proposed using, is that uniting some kind of community of

2   interest between northern Staten Island and Lower Manhattan?

3   A.   No, and nor should it when the premise was that

4   increasing diversity of the district might make it easier for

5   people of color to participate electorally.

6   THE COURT: Could it?

7   THE WITNESS: I don't see how adding -- I don't see

8   how adding -- I don't see how taking the portion of

9   New York 10 that is the least diverse and replacing it with

10   the portion of New York 11 that is, by this map, more

11   diverse would somehow increase minority participation in

12   government. I don't think that's anything that -- I don't

13   think there could be any justification.

14   THE COURT: Based on the proposed as described

15   illustrative map, that's your opinion?

16   THE WITNESS: Correct.

17   BY MS. DIRAGO:

18   Q.   And let's pull up the map on --

19   THE WITNESS: I do have opinions on why it was

20   done, though.

21   THE COURT: Well, let's see if counsel will ask

22   those questions.

23   BY MS. DIRAGO:

24   Q.   Well, let's go first to the map on page 12, Figure 3?

25   A.   I don't have something on page 3.

kp

1   Q.   Well, this one, Figure 3?

2   A.   Oh, yeah.

3   Q.   I may have -- is it the wrong page?

4   A.   This was in the Sugrue report, I think.

5   Q.   I'm sorry. You're right. From Dr. Sugrue's report.

6 I'm so sorry.

7   A.   This is a map that was in our report, but Dr. Sugrue

8 responded to it.

9   Q.   So where can -- well, do you know what this map was

10 showing, first of all?

11   A.   It's showing the Latino population of Staten Island

12 over time.

13   Q.   And where can Latinos on Staten Island be found?

14   A.   Throughout the borough.

15   Q.   How many ZIP codes does the Island have?

16   A.   That's trivia. I don't know that answer.

17   Q.   Okay. Can Latinos be found in every one of those ZIP

18 codes?

19   A.   Latinos are found in every ZIP code but they are the

20 majority in none. Meaning that their -- their percentage of the

21 population is spread fairly evenly throughout the borough.

22   Q.   And so do Latinos live on both sides of the expressway

23 in Staten Island?

24   A.   Yes.

25   Q.   Now, we talked a little bit about Dr. Sugrue's

1   testimony. And do you remember when he was talking about the

2   burnt-orange, the very dark orange area there, most prevalent on

3   the 2010 map?

4   A.   Yes, I do.

5   Q.   Can you tell us what that area is?

6   A.   Part of that area was formerly the Fresh Kills

7   Landfill, but I did read in Dr. Sugrue's testimony that he

8   believed that the rate of Hispanics in that community was high

9   because there were so few people.

10   Well, unfortunately, Dr. Sugrue, I live on the border

11   of that burnt-orange place. And -- one of the darker portions.

12   And I've lived there; my parents still own a house there. And

13   this was a community that -- that -- perhaps there isn't a

14   better one that illustrates this map in -- in -- in experience.

15   My neighborhood was built in the late '70s. It was

16   called Village Greens. It was thousands of units after the

17   Verrazzano Bridge was built. And it was primarily populated by

18   Italian and Jewish families. And my parents still live there.

19   So we see the neighborhood changing. It changes

20   ethnically. And it's become tremendously more diverse,

21   including Hispanics. We just sold my grandmother's house to a

22   Pakistani family who moved in a couple of years ago.

23   So this is really illustrative. Now, in that

24   burnt-orange point, which he says there's no one living there,

25   is the Town of Travis.

1   The Town of Travis on Staten Island dates back to the

2 19th Century. It used to be called Linoleumville. So if you

3 have an old floor in your house, it was made in Linoleumville

4 probably in the 19th Century. But these are towns and

5 communities that have been there for thousands of years. It's

6 very populous; the population is still growing.

7   The school in Travis just had to be expanded because of

8 the growth that's happening. So it's not just because a few

9 Hispanics out of a small population live there. It's because

10 there's a thriving Hispanic population living there.

11   THE COURT: Despite the growth in this, have they

12   been able to, as a voting bloc, the way they vote, elect

13   their candidate of choice?

14   THE WITNESS: Yeah, I mean, I'll point out the

15   member of Congress is a Hispanic woman --

16   THE COURT: That's not my question. I know the

17   answer that you're giving me, but that's not my question.

18   My question is, as a Hispanic voting bloc, is

19   there -- by race, do they have the opportunity to

20   participate in the political process the same way other

21   racial members -- as you described earlier, the Asian

22   community, and how they are able to participate, so you say.

23   Does the Hispanic community here, based on your looking at

24   these maps that counsel is showing you, have enough

25   population to be able to participate actively in the

1   political arena?

2   THE WITNESS: Yes, I think they do. And I base

3   that not being able to know who people vote for, obviously.

4   But we see a trend also in Staten Island that when people

5   move to Staten Island, they actually tend to vote and

6   register as registered Republicans. And that's in line with

7   a lot of the political choices Staten Islanders have made.

8   I think that's part of the reason why there is so

9   much sudden interest in changing New York 11 is that

10   regardless of who is moving into this borough, whether it be

11   Spanish people, or Pakistani people, there is a

12   likelihood -- and we see it in the registration data -- that

13   people are registering as Republicans. They're becoming

14   homeowners; they're becoming car drivers; they're becoming

15   property taxpayers.

16   The person I referenced who bought my grandparents'

17   house, a Pakistani family, he's an NYPD cop. He's, to my

18   knowledge, as conservative as anyone else who has moved into

19   that neighborhood.

20   MS. DIRAGO: Okay. And can you pull up page 16 of

21   Mr. Borelli's report.

22   BY MS. DIRAGO:

23   Q.   What is this map showing, Mr. Borelli?

24   A.   The Hispanic population of New York City by race.

25   Q.   And can you talk a little bit about what it is showing

1   especially vis-à-vis Lower Manhattan and the western part of

2   Brooklyn?

3   A.   It's showing that this population that exists in the

4   areas encompassing New York 11 now are more diverse with respect

5   to the Hispanic population than the inclusion of the

6   illustrative map's portion of Lower Manhattan as proposed.

7   And so if the theory is that somehow changing this

8   district will empower Hispanics, I believe it would do the

9   opposite.

10   Again, you have two districts that are adjacent to each

11   other, New York 10 and New York 11. This is removing one of the

12   most diverse portions of New York 11, and replacing it with one

13   of the least diverse portions of New York 10. I mean, that to

14   me only reeks of partisanship and not any sort of social justice

15   reason.

16   THE COURT: What about in helping the Asian

17   community?

18   THE WITNESS: Well, I think -- I mean, the -- the

19   primary portion of the Asian community in Brooklyn is

20   located just outside of New York 11 and New York 10.

21   If New York 11 was extended into what's commonly

22   called the Brooklyn Chinatown, it would make more sense. In

23   fact, when the City Council redistricted itself three years

24   ago now, I appointed members to the panel, the focus was

25   actually in uniting that Chinese district into a Chinese

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1   dominant -- and we have it now. We have

2   Councilwoman Susan Zhuang who represents it now.

3   If the petitioners did the same thing, it would

4   make more sense, in terms of empowering minority voices than

5   the current proposed map.

6 BY MS. DIRAGO:

7   Q.   Okay. I'd like to move on to racial appeals. And did

8 you analyze that factor for your report?

9   A.   Yes.

10   Q.   And I think it starts on page 52, if you need to

11 reference your report.

12   But the first question I want to ask is are racial

13 appeals common in elections in Staten Island?

14   A.   No.

15   Q.   And what was your research method for researching

16 of -- searching for racial appeals in Staten Island?

17   A.   It was primarily using newspaper sources and search

18 queries, using the term "racism" and "racist" and "issues," and

19 the purpose in doing that was to be methodical, objective, and

20 replicable.

21   And this same method was used in

22 Pierce v. North Carolina, a short time ago. And this method was

23 embraced by the judge there and preferred to the other method

24 offered.

25   And I -- I recognize that Dr. Sugrue made some

1 criticisms of this. But his criticisms didn't amount to much

2 when he could have replicated the method that I used and came up

3 with a host of racial appeals that my method seemingly missed,

4 and yet that did not happen.

5   Q.   And did Dr. Sugrue provide his research methods so that

6 you could replicate his methods?

7   A.   I don't recall. I think he did. I don't recall.

8 Essentially, his method was to find issues and then to try to

9 put his own narrative together that made issues that were

10 perhaps out of context into racial appeals. And -- again, I

11 couldn't put my -- I can't put myself in the head of --

12   MR. LALLINGER: Object to the extent he's

13   speculating about Dr. Sugrue's motives.

14   THE COURT: Sustained.

15   MS. DIRAGO: We'll leave it there.

16 BY MS. DIRAGO:

17   Q.   Let's talk about the results of your search. Did you

18 find any racial appeals in Staten Island?

19   A.   Yes, there were two of them. One was a case -- both

20 instances I'm personally familiar with, having been involved in

21 politics.

22   One was a case where two Republican candidates were

23 running for Congress. One candidate made an issue that the

24 other candidate changed his name -- not legally, but changed his

25 name in advertising from Jamshad Wyne to Jim Wyne. And that's

1 sort of the fact pattern of the case. The candidate basically

2 accused Dr. Wyne of trying to hide his Muslim identity during

3 that case.

4   Q. What year was that?

5   A. It was 2008. And so, I mean, Dr. Wyne made a very

6 strong case that this was against his race, and against his

7 religion, and that was his opinion. That -- that certainly was.

8   A little more context. Dr. Wyne was a very prominent

9 doctor with an office on Richmond Road, one of the primary

10 thoroughfares. You know, he was known to the community as

11 Dr. -- Dr. Jamshad Wyne. So it was a little odd that he did

12 change his name for the -- for the purposes of his political

13 campaign.

14   Q. And what was the other one that you found?

15   A. The other was a campaign between former

16 congressman -- Congressman Michael McMahon and Michael Grimm, in

17 which there was some photo taken or -- where -- or video taken

18 where there was a file marked "Jewish money" on a desk that was

19 controlled by Congressman McMahon.

20   There were -- like many campaigns do, they were

21 tracking different bundlers of money and they referred to it as

22 "Jewish money." And Michael Grimm called out his opponent for

23 doing that and made the case that it was an anti-Semitic

24 incident.

25   Q. And do you remember what year that was?

1   A.   2010.

2   Q.   In either of these elections, were the central issues

3 to the elections race or racial disparity or racism?

4   A.   No. I mean, in 2008, it was a very interesting

5 election. The previous congressman had stepped down in scandal

6 and that was a big part of it.

7   In 2010 was the "Tea Party year." So the Tea Party

8 movement was taking shape and it was vocal. And Michael Grimm

9 ran as a Tea Party candidate against the incumbent Michael

10 McMahon, and he won. It was mostly national issues.

11   Q.   When Dr. Sugrue testified, he referred to a specific ad

12 that I want to pull up. It's on page 50 of his report,

13 Figure 11. Have you seen this ad?

14   A.   I have.

15   Q.   Are you familiar with the circumstances, including who

16 created this ad?

17   A.   Unfortunately, yes.

18   Q.   Can you describe those circumstances?

19   A.   So the perpetrator -- and I use that term because he

20 was convicted of various crimes relating to his false

21 impersonation of somebody I knew from Cub Scout Troop 5, if you

22 want to believe how long we go back.

23   He did not only make fake accounts for

24 Councilwoman Rose, who is obviously a Black woman, but he also

25 made fake accounts about candidates for office and judges on

1   Staten Island who were not Black.

2   I mean, most notably a candidate named Janine Materna,

3   who ran for City Council on --

4   (Whereupon, the court reporter seeks a

5   clarification.)

6   A.   I'm sorry. Janine Materna, M-a-t-e-r-n-a. And he also

7   did fake accounts and, you know, incendiary and defamatory posts

8   about Judge Judy McMahon, who was the administrative judge for

9   Staten Island.

10   Q.   Does the -- does the ad represent Staten Island?

11   A.   No. I mean, this was universally denounced.

12   Republican elected officials were witnesses in the case against

13   him. White elected officials were witnesses against the

14   case -- in the case against him.

15   So, you know, this is not something that reflects in

16   any way how Staten Island conducts politics. In fact, it's just

17   the opposite. It became newsworthy because it was so absurd and

18   the perpetrator was so bizarre that it was newsworthy for that

19   respect.

20   Q.   Dr. Sugrue also discussed an ad that was targeting

21   Max Rose involving the Young Leaders and a march that they had.

22   Do you know what ad he was referencing?

23   A.   Yes.

24   Q.   And was this in -- in 2020?

25   A.   Yes. 2020.

1   Q.   Can you describe the ad?

2   A.   So it's an ad that shows video of Max Rose at a

3   protest. And it is interspersed with scenes of urban

4   lawlessness, police cars on fire, you know, police -- protestor

5   interactions, violent interactions, general criminality

6   interspersed with protesters marching and rallying.

7   Q.   And Dr. Sugrue says there were racial overtones in

8   that. Was that the case? Is that your opinion?

9   A.   I can't speculate what he feels when he sees an ad.

10   But there's a lot of context that he's missing. All right?

11   He called that a march through New Dorp. That was not

12   a march through New Dorp. That was a march specifically to the

13   122nd Precinct.

14   He wouldn't know that -- I don't think he has much

15   experience with the geography of Staten Island or the streets.

16   But the march was to the 122nd Police Precinct to protest the

17   police, to demand defunding the police. This was the summer of

18   2020.

19   Now, why is that significant in the context? Both

20   candidates in that race -- Max Rose, who is a friend of mine, a

21   dear friend of mine, wonderful rep, he sought the police union

22   endorsements. So did Nicole Malliotakis, right?

23   Police union endorsements are important because

24   Staten Island is home to a tremendous amount of police officers.

25   In fact, I believe the most union members of all five NYPD

1 unions are actually home -- living in Staten Island. So police

2 endorsements are very important.

3   Both candidates sought them. So it was very

4 significant that a person who was running as a pro-police

5 Democrat would somehow switch positions to now appear in "defund

6 the police" rallies.

7   So the ad was to create a wedge between Max Rose and

8 some of his moderate Democratic base. That's what political ad

9 makers do.

10   And the second thing was -- the second part of this was

11 this was part of a broader context in the summer of 2020 about

12 defund the police.

13   This was the summer of the George Floyd riots. Right?

14 And, you know, collaterally with -- with that, there were a

15 number of "defund the police" protests.

16   As you can imagine, as I just said, Staten Island is

17 home to a tremendous number of law enforcement officers. The

18 popularity of the "defund the police" movement was not very

19 strong on Staten Island.

20   This ad was, you know, just one of many ads that

21 focused on Max Rose's "defund the police" comments and -- and

22 participation at those rallies. And it mimics ads that were ran

23 all over the country against Democrats who have taken certain

24 positions against law enforcement or what was perceived as

25 against law enforcement.

1   "Defund the police" was one of the driving issues of

2 votes in the 2020 election cycle. And there is no reason why we

3 would assume Max Rose should be excluded from that, especially

4 when he showed up to an anti-police rally in the most

5 police-populated borough in the city.

6   The point is to win the election, not -- I think he

7 would tell you it was a mistake to go.

8   Q.   Okay. Let's switch. A related topic is hate crimes.

9 And this is one of the factors that you considered on

10 page 19 -- pages 19 to 29, whether there's a history of

11 discrimination in or affecting the political subdivision?

12   A.   Yeah. I mean, so my report has some statistics on hate

13 crimes that show that hate crimes have decreased on

14 Staten Island over the years.

15   I find it odd that Dr. Sugrue would sort of make the

16 case that there are racially motivated attacks, racial appeals

17 that are happening without utilizing the most robust hate crime

18 database that, to my knowledge, exists in the country.

19   The NYPD tracks hate crimes more so than any -- and

20 more specifically than any other department, to my knowledge, in

21 the country. They track by the race, gender, ethnicity of the

22 perpetrator, by the victim, the type of crime, et cetera. All

23 of this stuff is available publicly.

24   But if you're making a case that Staten Island was

25 this -- this racist bastion that I believe he makes it out to

1 be --

2   MR. LALLINGER: Objection. Objection, Your Honor.

3   Speculating again. Mischaracterizing the testimony.

4   THE COURT: Sustained.

5   Next question.

6 BY MS. DIRAGO:

7   Q.   So how does Staten Island hate crimes occurrence

8 compared to the rest of New York City?

9   A.   This is why I think the statistics were ignored.

10 Staten Island's hate crimes over the last five years --

11   MR. LALLINGER: Objection, again, to

12   mischaracterizing his testimony and speculating about his

13   motives.

14   (Senior Court Reporter Karen Perlman was replaced

15   by Senior Court Reporter Monica Hahn.)

16   (Transcript continues on the following page.)

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1   MS. DIRAGO: He is allowed to say that

2   Dr. Sugrue did not address the New York Police

3   Department's statistics on hate crimes. It was not in

4   his report. He didn't address them.

5   MR. LALLINGER: He can say that. He can't say

6   why.

7   MS. DIRAGO: I don't think he said why.

8   THE COURT: Let's continue.

9   A.   Nonetheless, the hate crimes statistics were not

10   included in Dr. Sugrue's report and paint a very different

11   picture then what is sometimes conceived about Staten

12   Island's racial views.

13   Staten Island in the last five years had four

14   percent of the City's hate crime reports, and three percent

15   of the City's hate crime arrests. Now, Staten Island is

16   about six percent of the City's population. When you do the

17   math you realize Staten Island's hate crime's are far lower

18   than the rest of the city.

19   When you look at the last five years, there is

20   an uptake in hate crimes after the October 7th attack and

21   the development of events in Israel and Palestine. And

22   since that time, there have been a sharp uptake in

23   antisemitic hate crimes. That effects that number.

24   When you take out that number, as offensive as

25   that maybe to some, when you take out antisemitic hate

1   crimes, the number of hate crimes against Blacks and

2   Hispanics is far lower than the race in the rest of the

3   city. In fact, I think there was one hate crime against

4   Hispanics in the last five years.

5   Q.   Dr. Sugrue also talks about protests against

6   immigration and connects those to anti-Latino sentiment.

7   Do you agree that all of these protests demonstrate

8   anti-Latino sentiment on Staten Island?

9   A.   No.

10   Q.   Why not?

11   A.   Because to say that you are protesting a migrant

12   shelter because you hate Latinos is not just offensive to

13   frame Staten Island like that, but it ignores the fact that

14   every neighborhood, or nearly every neighborhood where a

15   migrant shelter was placed, there was opposition to it.

16   And not only did we see protest in Staten Island, um, but we

17   saw protest in some of the most progressive neighbors in New

18   York City. Even neighbors where you had politicians who

19   were saying we should built more migrant shelters, they just

20   didn't want them in their district. One in Clinton Hill,

21   Brooklyn comes to mind there. You have major protests in

22   Brooklyn by Floyd Bennett Field on Flatbush Avenue, really

23   in a predominantly West Indian neighborhood. People were

24   protesting shelters there. You had shelter protests when

25   they were housing folks on Randall's Island. You had

1   protests, again, in the Bronx. There was a proposal for a

2   two thousand bed migrant shelter in the Bronx that was met

3   with Bronx cheer as they would say. So it is not unique

4   that Staten Island protest against homeless sheltering being

5   built in people's residential neighbors. In fact, it is the

6   normal.

7   In some of the cases he mentioned, being one

8   of the cases, it was a former high school in the middle of a

9   residential neighborhood that suddenly and overnight became

10   a migrant shelter housing, you know, a hundred or so

11   families, that is significant. And that was protested by a

12   bipartisan coalition. Bipartisan muti-racial coalition of

13   Staten Island elected officials opposed that site.

14   There was another protest, and where I'll

15   concede things got out of hand. People were throwing things

16   at buses, that is not right. I'm not justifying that.

17   There was a lot of anger in that community, Midland Beach,

18   just like there was elsewhere. This was a senior center, a

19   senior residence where the residence of the senior center,

20   people who lived there however long were removed from their

21   homes and replaced by a migrant facility. Those are the

22   kinds of things that are going to be unpopular. Homeless

23   shelters are unpopular in every Congressional district in

24   the country. If you want to win the election, you are not

25   going to run on that platform.

1   The point being, this is not unique to Staten

2   Island.

3   Q.   I'm going to switch gears and wrap it up soon. I

4   want to talk about election success.

5   Dr. Sugrue contends that minorities in Staten

6   Island have long been underrepresented in political offices

7   in Staten Island.

8   Do you agree with that statement?

9   A.   No. I think they are well represented now and for

10   the last 25 years.

11   Q.   So I would like to pull up Paragraph 90 of his

12   report, of Dr. Sugrue's report. I believe this is where he

13   is talking about elected officials of color in Staten

14   Island.

15   What is your opinion on what he says or maybe

16   doesn't say?

17   A.   Well, I mean, I think it is interesting, I don't

18   doubt that any of this is true. Certainly without

19   exception. But you have to look at the bigger picture of

20   why there was a lack of representation in some offices in

21   the city.

22   In 1989, after a court case here in New York

23   City, the city passed a new City charter. The city council

24   went from 35 members to 51 members. The reason in doing

25   that was in part because of a lack of minority

1   representation in the City council. That problem existed

2   on Staten Island. But the focus of that charter revision

3   was actually the failure to achieve representation by Blacks

4   and Hispanics predominately in the other boroughs where at

5   the time those populations were larger.

6   So there was a citywide failure of electing

7   people of color to offices. There was a citywide movement

8   to challenge those laws, and there was a massive

9   voter-approved charter revision in 1989 to address that by

10   aiding more members of the City council, exceptionally make

11   the districts smaller and more neighborhood based to almost

12   guarantee that people of color would be represented in

13   perhaps the proportion to their overall population of the

14   city.

15   Q.   So what successes have Blacks and Latinos had in

16   getting elected in Staten Island?

17   A.   Start with running. So Black and Hispanic

18   candidates have been on the ballot numerous times. They've

19   qualified for matching funds. Received major party

20   endorsements, successfully. Debbie Rose was the first

21   African American elected. She was a city council member.

22   Her district continues to be African American. It is held

23   by Kamillah Hanks. Kamillah Hanks is now the co-chair of

24   the Staten Island delegation to the council. The assembly

25   seat on the North Shore is held by an African American man,

1   Charles Fall, who is also the chairman of the democratic

2   party. He has been ostensibly one of the most powerful, if

3   not the most powerful elected official of the county of

4   Richmond of the democrat party chair. He is an African

5   American.

6   As Dr. Sugrue sort of pushes under the rug

7   and he notes that she was a Hispanic person when she ran for

8   assembly, but the, one of only two island-wide legislative

9   seats, New York 11 seats is held by a Hispanic woman, and

10   I'll point out she is a Hispanic woman that hasn't hid from

11   the fact, hid from the voters she is Hispanic. If anything

12   she touted it at many opportunities, if not every

13   opportunity she could.

14   Q.   And then I believe on Page 30 there was something

15   you wanted to clarify about judges being elected?

16   A.   Yes, yes. It should have been selected, not

17   elected. Not all judges in this state are elected. Many

18   are appointed, but they are selected by elected officials as

19   we all know how judges get made in the state.

20   Q.   Does that undermine the achievement in your mind?

21   A.   No. It still shows that African Americans,

22   Hispanics, Asians are still a vital part of the Richard

23   County bar, Richard County fiduciary.

24   Q.   So Mr. Borelli, based on your deep knowledge of

25   Staten Island, in your expert opinion does -- which map

1   makes more sense, Dr. Cooper's illustrative map or current

2   congressional map?

3   A.   There is --

4   MR. LALLINGER: Objection.

5   Beyond the scope of his expert report and

6   expertise.

7   MS. DIRAGO: I just would disagree.

8   THE COURT: Can the reporter read it back. I'm

9   sorry. I was distracted.

10   (Whereupon, the record was read back by the

11   reporter.)

12   THE COURT: I will allow it.

13   A.   So the current map of New York 11 represents a

14   district that is 50 percent White. So for the purposes of

15   having a enhanced ability for people of color to

16   participate, on that part of the question it makes

17   absolutely no sense to switch the moderately, but certainly

18   more than the other part, but moderately diverse portions of

19   New York 11 in Brooklyn for the almost exclusively White

20   portions of lower Manhattan. And I believe this was done

21   with partisan rational. This is one of the strongest vote

22   of democratic voting areas --

23   MR. LALLINGER: Objection. Speculation.

24   THE WITNESS: It is not speculation.

25   THE COURT: I will allow it.

1   A.   It is the voter history. I mean, every elected

2 official represents lower Manhattan is a democrat. They

3 voted overwhelming against Trump. Battery Park City is

4 filled with White people. This is not stipulation. It is

5 reality. Replacing moderately diverse portion of New York

6 10, New York 11 with the non-diverse portion of New York 10

7 doesn't make sense from that prospective.

8   As far as the community of interest notion,

9 if I blindfolded someone and opened their eyes right outside

10 of this courtroom in lower Manhattan, nobody would think

11 they were in Staten Island. If I did that in southern

12 Brooklyn or did that in Rockaway, if did that in parts of

13 Queens, you might.

14   This part of New York City is so unique, it is

15 why tourists come here to take pictures. It is in no way

16 similar. In terms of homeownership, in terms of ethnicity,

17 in terms of voting patterns. It is no way, in terms of

18 issues that matter to voters, it is in no way similar to

19 Staten Island, New York.

20   MS. DIRAGO: No more questions right now.

21   THE COURT: Thank you. All right. On track.

22 Are you okay? Do you need a break?

23   THE WITNESS: No, thank you.

24   THE COURT: All right. Let's start cross.

25   MR. LALLINGER: Your Honor, can we take a five

1   minute break before we --

2   THE COURT: You can take a five minute break.

3   We're all going to stay here and wait until you are

4   ready to come back, and then we'll get started. You can

5   take your time.

6   MR. LALLINGER: Thank you, your Honor.

7   THE COURT: If the witness doesn't want to go,

8   we will all stay.

9   (Whereupon, a short recess is taken.)

10   THE COURT: Back on the record.

11   Counsel, when you are ready, you may proceed.

12   MR. LALLINGER: Lucas Lallinger, on behalf of

13   the Williams Petitioners.

14   CROSS-EXAMINATION

15   BY MR. LALLINGER:

16   Q.   I would like to begin with a clarification on the

17   scope of your report.

18   In your expert report you only respond to the

19   expert report of Dr. Sugrue; is that right?

20   A.   Correct, but I've had the opportunity to review

21   some of the other testimony throughout the week.

22   Q.   You do not offer any opinion in response to the

23   expert reports of Dr. Max Palmer or Mr. Bill Cooper,

24   correct?

25   A.   Not to the reports, but I've read much of their

1   testimony.

2   Q.   Mr. Borelli, your report lists your qualifications

3   on Pages 1 through 3; is that right?

4   A.   Yes.

5   Q.   Now, you listed you earned a Master's degree

6   correct?

7   A.   Yes.

8   Q.   You don't have a Ph.D. or doctorate; is that right?

9   A.   No, sir.

10   Q.   You let us know you are adjunct profession

11   currently?

12   A.   Correct.

13   Q.   You are not an associate professor?

14   A.   No.

15   Q.   Not tenured?

16   A.   No.

17   Q.   And your report does not list any articles that

18   you've published in any peer reviewed academic journals; is

19   that right?

20   A.   Correct.

21   Q.   Is that because you never published in a peer

22   review academic journal?

23   A.   I never attempted.

24   Q.   Now, your report does not list any racial vote

25   dilution cases in which you have testified as an expert

1   witness; is that right?

2   A.   Correct.

3   Q.   And is that because you never testified as an

4   expert witness in any case involving claims of racial vote

5   dilution?

6   A.   Correct.

7   Q.   Prior to this case, had you ever performed an

8   analysis of the totality of the circumstances factors in a

9   case involving the New York Constitution or the New York

10   Voting Rights Act?

11   A.   No.

12   Q.   Have you ever analyzed the senate factors under

13   Section 2 of the federal Voting Rights Act?

14   A.   Previous to this, no.

15   Q.   Have you ever testified as an expert witness in any

16   case before?

17   A.   As a witness, yes. Expert witness, no.

18   Q.   Now, let's turn to what you have done.

19   We've heard you've been elected to political

20   office, correct?

21   A.   Yes, sir.

22   Q.   And you were elected to a partisan political

23   office; is that right?

24   A.   Yes, sir.

25   Q.   You were elected to the state assembly and the City

1   council; is that right?

2   A.   Correct.

3   Q.   And you've run and been elected as a republican

4   candidate for political office every time you've run,

5   correct?

6   A.   And conservative party member. We have fusion

7   voting in New York.

8   Q.   Now, do you dispute that you've been described in

9   media report as quote, "staunch republican"?

10   A.   No.

11   Q.   Would you agree with that characterization?

12   A.   No.

13   Q.   You don't agree that you are a staunch republican?

14   A.   I've been characterized by that, but if you ask me

15   how I feel personally about different things, you might find

16   a different person. Just this week I hosted a fundraiser

17   for a democratic state candidate. The characters we play on

18   TV are not always the characters we are.

19   Q.   Do you dispute you've also been described as a

20   voice of Staten Island's south shore, predominately White

21   neighborhoods, filled with homeowners and car drivers who

22   voted heavily for president Donald Trump in 2016 and again

23   in 2020?

24   A.   I don't remember reading that, but could have been.

25   If you are telling me a description, I do believe you.

1   Q.   And would you agree with that characterization?

2   A.   I agree that it is a characterization.

3   Q.   You have also been a spokesperson for the New York

4   State Republican Party; is that right?

5   A.   Correct.

6   Q.   You also been a surrogate for the Trump campaign;

7   is that right?

8   A.   Correct.

9   Q.   You've also been a surrogate for the Republican

10   National Committee; is that right?

11   A.   Correct.

12   Q.   And you were a co-chair of the Trump 2016 statewide

13   campaign?

14   A.   Correct.

15   Q.   Now, in your role as a spokesman and as a

16   surrogate, you've made multiple television appearances on

17   behalf of the republican party and particular republican

18   candidates; is that right?

19   A.   Correct.

20   Q.   As a surrogate, as a spokesperson, have you made

21   more than five television appearances on behalf of the

22   republican party and republican political candidates?

23   A.   I'm being booked for these segments sometimes as an

24   elected official, sometimes as a surrogate, sometimes as the

25   only available republican voice. It is hard to say as a

1   surrogate. If you are asking how many times I've appeared

2   on TV to talk generally about right-leaning causes, 1,500

3   maybe.

4   Q.   1,500?

5   A.   Probably.

6   Q.   So it would be fair to say that you've had far, far

7   more experience as a republican spokesman in your career

8   than the zero experience you had serving as an expert

9   witness?

10   A.   Serving as an expert witness perhaps, but not

11   serving as an expert and knowledgeable about the political

12   history of Staten Island, the demographics of Staten Island.

13   I think part and parcel to my job as an elected official was

14   to understand those things. Part and parcel as an adjunct

15   professor is to understand those things.

16   Q.   So the answer to my question is, yes?

17   A.   Repeat your question.

18   Q.   It would be fair to say that you've had far more

19   experience as the republican spokesman in your career than

20   the zero experience you've had serving as an expert witness?

21   A.   No. I wouldn't say that. I go on TV for five

22   minutes of the day. I spend nine hours of the day as an

23   elected official, or I did at least. Sometimes I don't even

24   put pants on to go on TV and be a spokesman. I just sit in

25   my basement.

1   Q.   We can agree you never served as an expert witness,

2   right?

3   A.   That part we agree.

4   Q.   You no longer hold any political office; is that

5   right?

6   A.   Um, no, it is not correct. I am, I was appointed

7   by the Democratic Mayor of the City to serve on the school

8   board, panel for education policy. I was appointed by the

9   Democratic Mayor of the City to serve on the board education

10 retirement system, the teachers' retirement system and the

11 United Nation Development Corporation. All of them are

12 required to file public official conflict of interest board

13 statements. So depending how you characterize your

14 question, that is the answer.

15   Q.   You currently hold all those roles?

16   A.   Yes.

17   THE COURT: You are the Mayor's appointee on

18   the UNDC?

19   THE WITNESS: I am. Nobody else has put me on

20   a billion dollar real estate board, so. Take what I can

21   get.

22   THE COURT: State authority.

23   THE WITNESS: Yeah. Mayor gets six appointees.

24   THE COURT: Understood.

25   Q.   In your direct-examination and in your report, you

1   discuss hate crimes and the presence of hate groups on

2   Staten Island; is that right?

3   A.   Yes.

4   Q.   In your direct-examination I think you mention the

5   New York City Police Department hate crimes dashboard; is

6   that right?

7   A.   We use the dashboard and the, I use the

8   spreadsheets, as well.

9   Q.   On Page 48 of your report, you wrote that according

10   to the New York City Police Department hate crimes dashboard

11   there were two hate crimes targeting Black people on Staten

12   Island in 2025, correct?

13   A.   Yes, to date. That was through the third quarter.

14   Q.   Thank you.

15   Did you visit the hate crimes dashboard when making

16   this report?

17   A.   Yes.

18   Q.   And when you did that, you noticed that you could

19   expand the date range beyond 2025, right?

20   A.   Yes. I looked at the hate crimes through the

21   spreadsheets back to 2020 because the spreadsheets give you

22   a full year rather than quarterly.

23   Q.   But you only reported the 2025 numbers for Black

24   Staten Islanders in your report, correct?

25   A.   Correct.

1   Q.   You didn't report that if you measured, for

2   example, from January 1, 2020, the dashboard identifies 32

3   arrests from 29 incidents of hate crimes against Black

4   people specifically in Staten Island over that time period,

5   right; you didn't report that?

6   A.   I didn't report that, but I referenced it in

7   today's testimony. I talked about the hate crimes going

8   back to 2020.

9   Q.   Would you consider 32 arrests from 29 incidents of

10   hate crimes in the past six years a significant number of

11   hate crimes?

12   A.   It is significant in the sense that any hate crime

13   is he appalling. Any hate crime should be denounced, and

14   I'm glad the police got the perpetrators. In respect to the

15   ratio of hate crimes that are occurring on Staten Island

16   compared to the rest of the city, we have a significantly

17   lower ratio. When you extrapolate antisemitic ones,

18   especially since October 7th, that ratio does get lower.

19   Q.   Again, I just want to be clear, the number 29

20   incidents, 32 arrests in the last six years, that was

21   particularly for Black people, you understand that, correct?

22   A.   Yes, I believe that is correct.

23   Q.   And do you recall that in his report Dr. Sugrue

24   identified numerous hate crimes over a period from 1925 on

25   forward?

1   A.   Yes. I mean, he referenced KKK incident in the 20s

2   if I remember correctly, and that certainly happened. But

3   it excludes the context that the KKK was a national

4   organization and the newspapers of that era are filled with

5   stories of KKK activities, not just from Staten Island, but

6   mostly other places, not Staten Island, New York. I think

7   that is significant in the context of whether this is some

8   unique place that is acting in a bias and prejudiced way.

9   Q.   Now, in his report Dr. Sugrue, for example,

10   identified a hate crime in 2021 when Ralph Tedesco pleaded

11   guilty, defacing the campaign posters of Kelvin Richards,

12   Black council candidate with the phrase, "F-U, N-words and

13   vandalizing an MTA bus with graffiti that read Black slaves

14   matter, they will never be equal, kill the N-word," you

15   don't dispute that even in your report?

16   A.   No, I don't dispute it and denounce it. It is

17   terrible. Again, we are tracking statistics and that

18   incident as profoundly insulting and offensive and wrong as

19   it was, counts as one instance in the hate crime reporting.

20   When we look at the context of all the data,

21   we see that Staten Island has a very good record, not a bad

22   record on hate crimes.

23   Q.   That is, you are talking about comparing it to

24   places outside of Staten Island; is that right?

25   A.   It is specifically that, places other than Staten

1   Island in New York City because I don't, I didn't look at

2   the data elsewhere. I used NYPD data.

3   Q.   Now, going back further, Dr. Sugrue wrote in 2009

4   the US Department of Justice indicted three White men in

5   Staten Island for brutal attacks against Blacks and Latinos

6   in Park Hill and Richmond on the night President Obama was

7   elected President, you don't dispute that account?

8   A.   No.

9   Q.   You also identify in your report that in 1995,

10   60 skinheads tried to disrupt an anti-hate rally in Staten

11   Island, correct?

12   A.   Look, I don't dispute that. My report makes no

13   attempt to whitewash history.

14   Q.   On the same page of your report, you discussed the

15   discovery of literature identifying a KKK group on Staten

16   Island in the early 90's, correct?

17   A.   Yes.

18   Q.   And going back further, you don't dispute

19   Dr. Sugrue's accounts that in 1987 as part of what the New

20   York Amsterdam News reported was a series of attacks on

21   Blacks and Hispanics on the island in that year. 30 Whites

22   chased two African Americans from the Staten Island mall in

23   New Springville, correct?

24   A.   I don't dispute that. To go back to the book that

25   Dr. Sugrue cited and I referenced earlier, why I brought up

1 earlier, the Kramer and Flanagan book, part of their

2 conclusion is that, yes, these incidents happened and they

3 are unfortunately part of the history of Staten Island, but

4 they are not evidentiary of what happens exclusively on

5 Staten Island. And in fact, these incidents happened at a

6 lower rate.

7   You know, Brooklyn in the 1970's and 80's was

8 the location of far more race-based violence then Staten

9 Island. There were incidents in Park Slope where if I

10 remember correctly Hispanic. I think at the time referred

11 to as a Puerto Rican person, obviously they are Hispanic, on

12 the roof of a building shooting at Black people. There were

13 race riots at John Jay High School in the 1960's and 70's.

14 There is a great book out there called Canarsie, ethnography

15 of the neighborhood of Canarsie and it talks about repeated

16 race-based violence in Brooklyn.

17   So I don't dispute any of this that Dr. Sugrue

18 pointed out. I don't think he made up these facts. He is

19 not painting a picture of why this is exclusive to Staten

20 Island.

21   Q.   Is it your understanding that under the totality of

22 the circumstances the history of racial discrimination needs

23 to be exclusive to the particular jurisdiction that you are

24 investigating?

25   A.   Yes.

1   Q.   Now, at Page 22 of Dr. Sugrue's report he writes

2   that "when hate crimes or hate incidents occur during

3   elections, they can send a message that it is dangerous to

4   vote and deter members of historically marginalized groups

5   from participating in the democratic process, by

6   discouraging communities of color and others from voting,

7   perpetrators of hate incidents attempt to stifle the voices

8   of historically marginalized groups resulting in skewed

9   elections."

10   You didn't present anything in your report that

11   disputes this conclusion, correct?

12   A.   No, I think that was a factor in race-based

13   violence around the country.

14   Q.   Now, you do however write in your report at Page 19

15   that quote, "there is no history of discrimination in or

16   affecting the political subdivision," correct?

17   A.   Repeat that.

18   Q.   You write in your report at Page 19 that quote,

19   "there is no history of discrimination in or affecting the

20   political subdivision;" is that right?

21   A.   I'm not seeing it, Page 19. Sorry. Give me a

22   second.

23   Q.   I believe it is the heading?

24   A.   Oh, yes. I see it. The point being there is no

25   history of political discrimination that affects political

1   races in the subdivision.

2   Q.   Okay. But the quote is, "there is no history of

3   discrimination in or affecting the political subdivision,"

4   correct?

5   A.   It should have been written in the context of.

6   Q.   And by political subdivision there you are

7   referring to Staten Island, correct?

8   A.   Yes.

9   Q.   Now, do you recall that Dr. Sugrue in his report

10   discusses redlining?

11   A.   Yes.

12   Q.   And he talks about it as one of a series of

13   discriminatory real estate and lending practices that

14   systematically excluded after African Americans from large

15   parts of Metropolitan New York, including Staten Island?

16   A.   Yes.

17   Q.   Now, you also discuss red-lining in your report; is

18   that right?

19   A.   Yes.

20   Q.   And you cite an article by Price Fishback and a

21   couple of other authors entitled, "New Evidence on redlining

22   by Federal Housing Programs in the 1930's," is that right?

23   A.   Yes.

24   Q.   Did you review this article in preparing the

25   report?

1   A.   Briefly.

2   Q.   You write that the article is quote, "especially

3 useful in understanding federal housing mortgage policy and

4 allegations of federal racial discrimination through

5 lending;" is that right?

6   A.   Yes. It presents some contrary evidence.

7   (Transcript continues on the next page.)

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1 CROSS-EXAMINATION

2 BY MR. LALLINGER:

3   Q.   And you write that the article discusses a study of

4 Baltimore, Maryland; Peoria, Illinois; and Greensboro,

5 North Carolina, right?

6   A.   Yes.

7   Q.   And you quote the study as stating that the evidence

8 from the three cities shows that the Home Owners' Loan

9 Corporation refinanced loans in neighborhoods throughout each

10 city and that the share of loans made by the HOLC to Black

11 Americans was close to proportionate to the shares of homeowners

12 who were Black, right?

13   A.   Yes.

14   Q.   But you didn't report that when the HOLC made loans, it

15 did so along segregated lines, right?

16   A.   No.   But I mean, that was an accepted point of

17 Dr. Sugrue's report.   That -- that portion is not really in

18 dispute.

19   MR. LALLINGER: Let's bring up the article.   And

20   can we go to page --

21   Q.   Actually, first, is this the article that you reviewed?

22   A.   Yes.

23   Q.   And can we turn to page 4?

24   MS. DIRAGO: Do you have a copy for him?   Is it

25   in --

1   MR. LALLINGER: Certainly.

2   Thank you.

3   (Handing.)

4   THE WITNESS: Thank you.

5   A.   What page are we on? What page?

6   Q.   Turn to page 3. Actually, page 4.

7   And do you see in the middle of the second paragraph,

8   where it states that when the HOLC issued loans broadly

9   throughout American cities, including to Black homeowners, it

10   did so within the existing patterns of segregation?

11   A.   Yes.

12   Q.   And you don't dispute that statement, correct?

13   A.   No.

14   Q.   Now, let's turn to page 27 of that article.

15   And at the top of the second paragraph on that

16   page -- and it's also on the screen here, "This is not to say

17   that the HOLC defied the existing pattern of segregation and

18   discrimination in housing markets. Neither the HOLC nor the

19   Federal Housing Authority was charged with that mission and

20   neither embraced it."

21   Did I read that correctly?

22   A.   Yes.

23   Q.   And you don't dispute that either?

24   A.   No.

25   Q.   And, finally, let's go to page 7.

kp

1   And down at the bottom of the page, the authors write,

2   "Altogether, staff at both agencies clearly espoused views that

3   were discriminatory, pro-segregation, and amount to what today

4   is called redlining."

5   Did I read that correctly?

6   A.   Yes.

7   Q.   And you don't dispute that either?

8   A.   No.

9   Q.   So it would be fair to say that based on this article,

10 which you concluded was especially useful in understanding

11 federal housing mortgage policy and allegations of federal

12 racial discrimination, that the Home Owners' Loan Corporation

13 and the Federal Housing Authority loan practices reinforced

14 segregation?

15 A.   I think there is a broad segment of research that does

16 indicate that and concurs with your opinion. I mean, the issue

17 that I take with it is that, number one, these are events that

18 took place decades ago, before Staten Island was even largely

19 developed.

20   I mean, Staten Island's population previous to the

21 bridge opening up was -- at this period of time, 150,000 people.

22 It is a half million now.

23   The other portion of this is that it's not unique to

24 Staten Island. This is not an argument that Staten Island

25 homeowners, be it Black or Hispanic or anything, faced a

kp

1   challenge that didn't exist in Lower Manhattan or Brooklyn.

2   It's the same challenge.

3   MR. LALLINGER: Okay. We can take this down.

4   And can we bring up Figure 5 on page 19 of PX-1,

5   which is Dr. Sugrue's report.

6   BY MR. LALLINGER:

7   Q.   And you don't have a copy of Dr. Sugrue's report?

8   A.   I don't on me, no.

9   MR. LALLINGER: Thank you.

10   (Handing.)

11   A.   What page?

12   Q.   Figure 5 on page 19.

13   That figure is also up on the screen.

14   A.   Thank you.

15   Q.   Now, this figure is a map showing redlined

16   neighborhoods in Staten Island in 1940; is that right?

17   A.   Yes.

18   Q.   Now, at pages 38 and 39 -- I'm sorry, at paragraphs 38

19   and 39 of Dr. Sugrue's opening report, he identifies particular

20   neighborhoods in Staten Island, including Sandy Ground,

21   Rossville, Charleston, Willowbrook, Meiers Corners, and part of

22   West Brighton that were redlined and given the lowest

23   neighborhood rating by the HOLC; is that right?

24   A.   Yes.

25   Q.   And in your report, you don't dispute any of that,

1 correct?

2   A.   No. It's evident on the map.

3   Q.   Now, let's turn to page 21, paragraph 40 of

4 Dr. Sugrue's report.

5   And here, Dr. Sugrue discusses the effect that

6 redlining has had today.

7   He writes, "There is now a substantial body of

8 scholarship by historians, sociologists, public health scholars,

9 and economists, demonstrating that redlining in the

10 mid-20th Century has had a long-term impact on nearly every

11 aspect of community life."

12   Do you see that?

13   A.   I see it.

14   Q.   Did I read that correctly?

15   A.   Yes, you read it correctly.

16   Q.   And he continues that "Redlined neighborhoods -- even

17 those that were mostly White when the maps were composed -- are

18 more likely to house non-Whites today. Residents of those

19 neighborhoods are more likely to have lower incomes than

20 residents of higher-ranked neighborhood? And by most measures,

21 health outcomes in historically redlined neighborhoods are

22 poor."

23   Did I read that correctly?

24   A.   Yes.

25   Q.   Now, you didn't provide anything in your report, any

kp

1   scholarship that challenges this body of scholarship about the

2   present-day impact of redlining on formerly redlined

3   neighborhoods; is that right?

4   A.   No. I mean, I do think it's tough to draw comparisons

5   when the borough was so sparsely populated to what it is today.

6   But I suppose that's not unique to Staten Island as well.

7   Q.   Now, you also discuss residential segregation today on

8   Staten Island in your report, right?

9   A.   Yes.

10   Q.   At page 13 of your report, you provide the results of

11   your calculation of the index of dissimilarity for Latino and

12   White Staten Islanders; is that right?

13   A.   Yes.

14   Q.   And in your report, for the year 2023, the

15   dissimilarity value was 42, right?

16   A.   For Hispanics.

17   Q.   For Hispanics?

18   A.   Yes.

19   Q.   And you agree that a dissimilarity value of 42 means

20   that Latinos and Whites face moderate racial residential

21   segregation on Staten Island, right?

22   A.   That's correct. Although 42 would be at the very low

23   end of what is considered moderate.

24   Q.   And I want to be clear again because we've been

25   discussing historical discrimination before, but that is based

1   on 2023 data, which is the most up-to-date data that you have in

2   your report, right?

3   A.   Correct.

4   Q.   Now, in your report, you don't calculate the index of

5   dissimilarity value for Black Staten Islanders, right?

6   A.   No.

7   Q.   But Dr. Sugrue does in his report; is that right?

8   A.   He does. I don't recall the number.

9   Q.   Right. So he reports it to be 75. Do you dispute

10   that?

11   A.   I don't. Do you want the number for the rest of the

12   city?

13   Q.   No.

14   A.   It's 84. Which is far worse than Dr. Sugrue's number

15   on Staten Island.

16   Q.   And dissimilarity index value of 75 means high racial

17   segregation between Blacks and Whites on Staten Island, right?

18   A.   High, but not as high as other parts of the city.

19   Q.   And you agree that the level of residential segregation

20   for Black Staten Islanders has increased since 2010, correct?

21   A.   You have to show me the statistics. I don't know that

22   to be the case anecdotally.

23   MR. LALLINGER: Can we pull up page 15,

24   paragraph 26, Figure 4 of Dr. Sugrue's report.

25   THE WITNESS: Did you say page 15?

kp

1   MR. LALLINGER: Yes. It's Figure 4.

2   BY MR. LALLINGER:

3   Q.   Now, do you see this figure is entitled "Residential

4   Segregation on Staten Island 1990 to 2019 Through 2023"?

5   A.   Yes.

6   Q.   And do you see for the White-Black dissimilarity value

7   in 1990 it was 72?

8   A.   Yes.

9   Q.   And that in 2019 to 2023 it was 75?

10   A.   Yes.

11   Q.   So do you agree that segregation has increased from

12 1990 to 2023?

13   A.   According to the index of dissimilarity, yes.

14   Q.   Now, shifting gears some. You also discussed racial

15 appeals on direct. Is that right?

16   A.   Yes.

17   Q.   And one of the totality of the circumstances factors is

18 whether there are racial appeals in campaigns in the political

19 subdivision?

20   A.   Yes.

21   Q.   Now, you also discuss your methodology for attempting

22 to identify racial appeals, right?

23   A.   Yes.

24   Q.   And your methodology was, to be clear, to search for

25 the word "racism" and the word "issues" in the newspaper

1   database, newspapers.com, in election years from 2000 to 2024;

2   is that right?

3   A.   Yes. And the word "racist" as a variation.

4   Q.   But you didn't include that variation in the discussion

5   of your methodology in your report?

6   A.   No. In error.

7   Q.   And looking for these three keywords was the entirety

8   of your methodology for your search; is that right?

9   A.   Correct.

10   Q.   And other than switching "racism" to "racist" -- is

11 that the other term that you identified?

12   A.   Correct.

13   Q.   So other than switching "racism" to "racist," you

14 didn't refine your search with any other search terms; is that

15 right?

16   A.   No. Because the goal of this method is to see what was

17 reported as a racial appeal contemporaneously as it

18 occurred -- right? -- whereas Dr. Sugrue's method was to find

19 issues, differences, attacks, political attacks, and then try to

20 back in the notion that they were racial appeals.

21   Our method, which again was -- was cited in the Pierce

22 case in North Carolina as the preferred method, was to do

23 something objective and replicable that we can look and see how

24 it was reported.

25   Now, if you look around the country, you can see this

kp

1 as an effective method of finding other ads and political

2 attacks that have been deemed racial appeals.

3   I'll give you a great example. We had the professor

4 here earlier today who was from Kentucky. Thomas Massie is from

5 Kentucky. Thomas Massie was in a primary in 2020. I forget the

6 name of his challenger but there were some clear racist comments

7 that were made and that received national news that was called

8 out contemporaneously by his opponent as racism. It was

9 reported nationally, in that instant.

10   Same thing with Georgia, Georgia -- Bryan Kemp ran for

11 governor I think in 2018. He had a pretty offensive ad. He

12 pulled up in a pickup truck to a Home Depot or something, and

13 waited for Hispanic men to come over as day laborers and then

14 basically ostracized them in an ad. That was called out as

15 racist and xenophobic and all of these things. But it was

16 reported as a racial appeal contemporaneously at the time. I

17 mean, that's objectivity.

18   Again, the method we used could have been replicated by

19 Dr. Sugrue and he could have come up with, you know, more. I

20 just don't think he did. He didn't put it in his report. He

21 didn't put it in his rebuttal.

22 Q.   So you would agree that in using your methodology, in

23 order for you to identify any racial appeal using your

24 methodology, you -- they would have to use one of those three

25 particular terms, correct?

1   A.   Yeah, or the algorithm would pick it up in a search

2   database. You know, sometimes there are tag words --

3   Q.   You mentioned -- you mentioned on direct that this was

4   an approach that you took from Pierce, the Pierce case in

5   North Carolina?

6   A.   Yeah. So one of the assistants that assisted me on

7   this case was Dr. Donald Critchlow, who was the expert witness

8   in that case.

9   Q.   You didn't include any citation to any scholarly

10 sources or to any court cases when you identified your

11 methodology for identifying racial appeals; is that right?

12   A.   Correct.

13   Q.   Now, you discussed the Young Leaders on direct. Do you

14 recall that?

15   A.   I discussed an ad. Yes.

16   Q.   And ad involving the Young Leaders of Staten Island,

17 correct?

18   A.   I don't know any of the Young Leaders personally. So

19 there was some indication that they were in the ad. I -- I

20 could not attest to that.

21   Q.   Okay. So at page 48 of your report, you described the

22 Young Leaders as one of a couple of groups that support minority

23 rights, and along with other groups held several rallies around

24 the borough in an effort to get voters engaged in the 2020

25 election; is that right?

1   A.   That is correct.

2   Q.   And on that page of your report you cited to an article

3 in the city that's Footnote 119, that's entitled, quote, Their

4 Anti-Racism Marches Were Twisted in a $4 Million GOP Attack Ad

5 Campaign. Now They Just Want to Get Out the Vote; is that

6 right?

7   A.   Yes.

8   Q.   Now, that article detailed a couple of pro-Malliotakis

9 advertisements that were run during the 2020 race for the

10 11th congressional district; is that right?

11   A.   Yes.

12   Q.   And Dr. Sugrue quotes the article at page 16,

13 paragraph 41 of his rebuttal report.

14   MR. LALLINGER: Can we put that up on the screen?

15   And we'll get you a copy of the report.

16   (Handing.)

17   THE WITNESS: Thank you.

18   THE COURT OFFICER: You're welcome.

19 BY MR. LALLINGER:

20   Q.   And we're at page 16, paragraph 41.

21   A.   Got it.

22   Q.   And I'm reading from the second sentence. "The article

23 describes that footage of one peaceful march" -- and they're

24 talking about a march by the Young Leaders -- "was interspersed

25 with doctored images of police cars ablaze -- became the

kp

1   centerpiece of an attack ad touting Assembly member

2   Nicole Malliotakis and trashing Representative Max Rose, in her

3   successful bid to oust the Freshman Democrat from the

4   Staten Island house seat."

5   Did I read that correctly?

6   A.   Yes.

7   Q.   Further down on that same page, he identified another

8   racial appeal concerning the Young Leaders. He writes, "The

9   city continued one Republican political action committee, the

10   Congressional Leadership Fund poured in at least $4 million into

11   televising ads focused on Rose attending the march. One of the

12   spots showed some of the Young Leaders of Staten Island and

13   footage of their June 3rd march in New Dorp, spliced with

14   violent scenes, while a narrator spoke of criminals hailed as

15   freedom fighters."

16   Did I read that correctly?

17   A.   Yes.

18   Q.   And Dr. Sugrue identifies that as a racial appeal

19   because "Linking candidates to Black criminality is a common

20   strategy in electoral racial appeals. Contrary to how they were

21   depicted in the advertisements, the Young Leaders called for

22   better police community relations, opposed calls to defund the

23   police, and stated their concerns about crime."

24   Do you see that?

25   A.   I do.

1   Q.   Now, Dr. Sugrue, in his report, cites "Academic

2   scholarship that explains that racial appeals often involved

3   negative stereotypical imagery that might activate voters'

4   negative racial attitudes including depictions of African

5   Americans as criminals."

6   And did you see that? That is at paragraph 42.

7   A.   I did. But just to go back to your previous

8   question --

9   Q.   The only question is if you saw that.

10   A.   I did see it.

11   Q.   Okay. Thank you.

12   Now, you do not present any academic scholarship in

13   your report that challenges the association of Black people with

14   criminality as a common tactic in racial appeals, correct?

15   A.   No, I challenged the context of that ad.

16   Q.   All right.

17   So the answer to my question is yes, you do not present

18   any academic scholarship in your report that challenges the

19   association of Black people with criminality as a common tactic

20   in racial appeals?

21   A.   No.

22   Q.   Is that right?

23   A.   Correct. Yes. Excuse me.

24   Q.   Now, you also discussed --

25   MR. LALLINGER: We can take this down.

kp

1   Q.   You also discussed socioeconomic factors on

2   Staten Island; is that right?

3   A.   Yes.

4   Q.   You discussed education, income, and housing?

5   A.   Yes.

6   Q.   On pages 38 and 39 of your report, you present three

7   tables showing educational attainment by race in Staten Island;

8   is that right?

9   A.   Yes.

10   MR. LALLINGER: And can we bring up the first table

11   which is entitled "2024 Educational Attainment By Race" on

12   page 38.

13   Q.   Now, the last column here is labeled "Percent of

14   White." So that means if we look at what's in the fourth row of

15   that column, which is labeled "Black bachelor's degrees or

16   higher," it's telling us that Black Staten Islanders graduate

17   college or have bachelor's degrees at 71.77 percent of the rate

18   that Whites do; is that right?

19   A.   Yes.

20   Q.   And you would agree that demonstrates a greater than

21   28 percent disparity in college completion rates between Blacks

22   and Whites on Staten Island?

23   A.   Yes. The point I'm showing against the percentage of

24   White is to show the disparity between this number and the

25   number a decade earlier has improved for the most part for most

1   of the races.

2   Q.   And Latino Staten Islanders have college degrees at

3   52.63 percent of Whites, correct?

4   A.   Yes.

5   Q.   And that amounts to a greater than 47 percent

6   disparity?

7   A.   Yes.

8   MR. LALLINGER: Okay. Can we bring up the first

9   table on page 39. Next to this table. Thank you.

10   Q.   And that is entitled "2020 Educational Attainment By

11 Race."

12   Now, you just said that generally the disparities have

13 gone down; is that right?

14   A.   Yes. For the most part.

15   Q.   So if we take a look at the 2020 figures, and we focus

16 on the fourth column there entitled "percent of White," and we

17 look at the row entitled "Black bachelor's degree or higher,"

18 the square identifies 76.33 percent, correct?

19   A.   Yes.

20   Q.   And if we compare 76.33 to 71.77, then it shows that it

21 was actually higher in 2020?

22   A.   Yes.

23   Q.   Right? So the disparity has grown since 2020?

24   A.   In this instance, yes.

25   Q.   And the same is true for the Latinos's bachelor degree

kp

1   are a higher percentage; is that right? So that is comparing

2   56 --

3   A.   Yes.

4   Q.   -- .12 in 2020 with 52.63 in 2024?

5   A.   Yes.

6   Q.   And the same is also true about the Latino high school

7   graduation rate, correct?

8   A.   Yes.

9   MR. LALLINGER: Okay. We can take this down.

10   Q.   Now, you also discussed housing on Staten Island; is

11   that right?

12   A.   Yes.

13   MR. LALLINGER: Can we pull up page 40,

14   paragraph 79, Figure 9 of Dr. Sugrue's opening report.

15   Q.   Now, this figure is entitled "Housing Tenure By Race

16   and Ethnicity on Staten Island 2019 to 2023," correct?

17   A.   Yes.

18   Q.   And you agree that this shows that nearly 77 percent of

19   Whites on Staten Island are homeowners, but less than 36 percent

20   of Blacks, and less than 44 percent of Latinos are homeowners,

21   correct?

22   A.   Correct.

23   Q.   And this is the most recent, up-to-date data that is in

24   either of your reports, correct?

25   A.   That I'm aware, yes.

1   MR. LALLINGER: Okay. We can take this down.

2   Q.   At page -- you also discuss income in your report; is

3   that right?

4   A.   Yes.

5   MR. LALLINGER: Can we bring up page 44 of

6   Mr. Borelli's report. That is IRX-002.

7   Q.   And here you present three tables that describe

8   household income by race on Staten Island?

9   A.   Yes.

10   Q.   Now, to shorten things a little bit, you would agree

11   that in all of these charts, neither Black nor Hispanic mean

12   household income ever exceeds 66 percent of White household

13   income; is that right? It's never greater than 66 percent?

14   A.   Yes.

15   Q.   And I would like to be very clear again since we

16   discussed some historical disparities and you've mentioned

17   progress, but this is the most current data that is in evidence

18   that shows in 2024 there was a greater than 34 percent disparity

19   between White and Black mean household income; is that right?

20   A.   Yes. But it's an improvement.

21   Q.   And a greater than 35 percent disparity between Latino

22   and White household income; is that right?

23   A.   Yes, but, again, it's an improvement.

24   MR. LALLINGER: And we can take this down.

25   Q.   You also agree that one factor of the totality of the

kp

1   circumstances factors examines the extent to which members of a

2   protected class in the state or political subdivision vote at

3   lower rates than other members of the electorate, right?

4   A.   Yes.

5   Q.   And you present some data on voting rates in your

6   report?

7   A.   On Hispanics, yes.

8   MR. LALLINGER: Let's pull up Table 4.

9   Q.   This is on page 35 of your report. That is IRX-002.

10   And this presents the percentage of the electorate that

11   registered and voted by race and ethnicity in the 2018 midterm

12   elections; is that right?

13   A.   Yes. For the state.

14   Q.   Now, does this -- does this present data for the entire

15   United States?

16   A.   I forget off the top of my head. I think it's for the

17   State of New York. No, I'm sorry, this is nationwide.

18   Q.   Thank you.

19   Now, the four bars on the right show the percent of the

20   electorate that voted, correct?

21   A.   Yes.

22   Q.   And this shows broadly a disparity between the

23   non-Hispanic White vote and the non-Hispanic Black and Latino

24   vote, correct?

25   A.   Yes.

1   Q.   Let's take a look at your Table 5 on page 35 of your

2   report.

3   Now, this is a similar chart, but it shows a percentage

4   of the electorate registered and voted by race and ethnicity in

5   the midterm elections in 2022, correct?

6   A.   Yes.

7   Q.   And your own data again show -- shows a disparity

8   between the percentage of the White vote as compared to the

9   percentage of the Latino and the Black vote, correct?

10   A.   Correct.

11   Q.   And that disparity in 2022 was more than 19 percent for

12   the Latino-White comparison?

13   A.   I trust your subtraction, yes.

14   Q.   And it was greater than 12 percent for the Black-White

15   voter disparity?

16   A.   Yes.

17   Q.   So, again, for the most current data that you present,

18   you -- your own data shows disparities between voter turnout by

19   race on Staten Island, correct?

20   A.   Well, I don't have Staten Island-specific data.

21   Q.   I'm sorry, in the United States.

22   A.   Yes, correct.

23   MR. LALLINGER: Let's bring up page 9, Figure 6 of

24   PX-3, which is the expert report of Maxwell Palmer.

25   MS. DIRAGO: Objection. This goes beyond the scope

1   of the direct.

2   MR. LALLINGER: We were talking about voting

3   rights -- voting rates in the scope of the direct. This is

4   directly related. This is the actual data of -- from

5   Staten Island.

6   MS. DIRAGO: We did not discuss Dr. Palmer's report

7   or his data on this at all.

8   MR. LALLINGER: This is relevant to the rate of

9   votes --

10   THE COURT: In the context of -- I'll allow it

11   because it's in the context of race and I want to hear the

12   expert witness regarding race.

13   MS. DIRAGO: Okay, Your Honor.

14   BY MR. LALLINGER:

15   Q.   Do you see that this figure is labeled "Estimated voter

16   turnout by race and election in Staten Island"?

17   A.   Yes. This is the first I'm seeing this.

18   Q.   Do you see that it has three dates above the three

19   charts in the figure: 2020, 2022, and 2024?

20   A.   Yes.

21   Q.   And do you see that in 2024, White voter turnout was

22   71 percent?

23   A.   That's what the chart says.

24   Q.   Hispanic voter turnout is labeled at 58 percent?

25   A.   That's what the chart says.

1   Q.   And Black turnout was labeled at 54 percent?

2   A.   That's what the chart says.

3   Q.   Do you have any reason to dispute these figures?

4   A.   Yes. It says "estimated voter turnout by race and

5   election." It's not an accurate count of voter turnout by race.

6   It's an estimate. If there was this data actually available,

7   the politician in me, the political consultant in me would be

8   using that data to try to win supplemental elections. But this

9   is the first I'm seeing this.

10   Q.   Do you have any reason to dispute that this is an

11   accurate estimate of voter turnout by race and election in

12   Staten Island?

13   MS. DIRAGO: Objection. He doesn't even know what

14   this is.

15   THE COURT: Sustained.

16   MS. DIRAGO: Thank you.

17   THE COURT: Next question.

18   MR. LALLINGER: Okay. We can take this down.

19   BY MR. LALLINGER:

20   Q.   Now, you also talked about Black and Latino elected

21   officials on Staten Island in your direct?

22   A.   Yes.

23   Q.   You'd agree that Black people have lived on

24   Staten Island for at least 200 years, correct?

25   A.   Yes.

1   Q.   And its entire -- and in its entire history,

2 Staten Island has only elected two Black City Council members;

3 is that right?

4   A.   Yes.

5   Q.   And the first one was in 2009; is that right?

6   A.   Correct.

7   Q.   And you would agree that it has no -- it had no Latino

8 City Council members?

9   A.   Not in the City Council, no.

10   Q.   And there has never been a Black US Congressional

11 representative from Staten Island; is that right?

12   A.   No.

13   Q.   And a Charles Fall, who currently represents Assembly

14 District 61, is the first and only Black person to represent

15 Staten Island in the state legislature?

16   A.   Yes.

17   (Senior Court Reporter Karen Perlman was replaced

18   by Senior Court Reporter Monica Hahn.)

19   (Transcript continues on the following page.)

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1   MR. LALLINGER: I pass the witness.

2   THE COURT: Thank you.

3   Redirect?

4   MS. DIRAGO: I don't have any redirect, your

5   Honor.

6   MR. FASO: We have no questions, your Honor.

7   THE COURT: Okay. Well, thank you for your

8   testimony.

9   MS. DIRAGO: We rest, your Honor.

10   MR. FASO: Likewise.

11   THE COURT: Let's take a five minute break.

12   Let me gather some thoughts. I want to just address the

13   parties and we can discuss next steps, et cetera, all

14   right.

15   Let's take five minutes.

16   (Whereupon, a short recess is taken.)

17   THE COURT: All right. Well, back on the

18   record.

19   Good job everybody. Nice working, getting it

20   done on time. Gives me a little bit of time and I want

21   to use that time wisely.

22   So I'm going to put an order on the record

23   that will help you all finalize this matter for us. I

24   have one question that I'll ask that I want briefed and

25   then I'll give deadlines for that, the summations, et

1   cetera.

2   So forgive me, I'm going to read it. I wrote

3   it down. And here we go:

4   So the state respondents have requested the

5   opportunity to submit extra papers on the proper remedy

6   in this case, should the court find the current lines

7   unconstitutional. They believe that ordering specific

8   lines is improper.

9   While the court currently reserves judgment on

10   the constitutionality of the current congressional

11   lines, we would like to give the state respondents and

12   all interested parties to have that same opportunity,

13   so by Monday, January 12th, please submit. I'll give

14   you until close of business, what maybe the proper

15   remedy should the court find in favor of the

16   petitioners. Let's keep the page limit to no more than

17   ten pages.

18   And then in relation to the written summations,

19   those will be due by close of business Wednesday,

20   January 14th. Also ordered all without prejudice.

21   That is all I have for on the record.

22   Does anyone else want to put anything on the

23   record? And then I want to go off the record and

24   discussion, you know, cleaning up the evidence,

25   virtually evidence courtroom that I think we can do

1   before close of business today.

2   So on the record?

3   MS. BRANCH: I have one question with respect

4   to the written summations, your Honor. This is Aria

5   Branch, for Petitioner.

6   Is there a particular format you would like

7   those briefs to be in?

8   MR. TSEYTLIN: I was going to ask the same, do

9   you want proposed, do you want, I was going to ask the

10   same, do you want proposed findings of fact, conclusions

11   of law, or do you want in the nature of the briefing

12   that your Honor received so far, counsel argument with

13   citations. Kind of similar, but a little bit different

14   in tone at least.

15   THE COURT: I will leave it open. So you can

16   respond however you see fit. As far as format goes, I'm

17   not partial to a format.

18   What I'm trying to get to is, if the court,

19   because of what the state has requested, the state

20   respondents have requested, I would expect they are

21   going to submit something. I want to give these, you

22   two the same opportunity to write the brief that says

23   if the court finds the current lines unconstitutional,

24   if the court finds the illustrative as described lines

25   unconstitutional, what is the next step, what is the

1   remedy.

2   MR. TSEYTLIN: Your Honor, I think Ms. Branch

3   and I were asking about the submissions on Wednesday and

4   what format the court wants those in, proposed findings

5   conclusions of law.

6   THE COURT: I didn't hear your words.

7   MR. TSEYTLIN: The filing on Wednesday, the

8   post-trial submission, the big one, not on the remedy,

9   whether the court prefers conclusions of fact, proposed

10   conclusions of fact and conclusions of law?

11   THE COURT: Yes. I'm sorry. I misunderstood

12   the question. Yes, I would like proposed conclusions of

13   fact and standards of law, and that is all.

14   MR. FASO: Is that distinct from the summation,

15   I think the summation is a summary of, you know, counsel

16   is making at the end of a trial.

17   THE COURT: Exactly. So that is all I'm

18   looking for is wrap it up.

19   MR. FASO: Okay.

20   THE COURT: You can use your findings of fact

21   and conclusions of law in the summation, yes.

22   MR. FASO: Thank you.

23   THE COURT: I'm sorry, maybe I'm not as

24   litigious just in understanding of what it is I'm

25   looking for. I'm looking for you to wrap it up. Put

1   it all together in a nice neat bow and explain to me

2   what I should do from your prospective as respondents

3   and respondent intervenors and petitioners and as state

4   respondents. Okay.

5   Understanding the state, I know we are still

6   on the record, but the state, it is my understanding in

7   their briefs believe, the state believes that my

8   ordering of a specific set of lines would be improper,

9   and so by that statement I want to know what you think

10   is proper.

11   Anything else on the record? Okay. Thank you.

12   Let's go off the record.

13   (Whereupon, a short recess is taken.)

14   THE COURT: Okay. Thank you.

15   (Whereupon, the case is adjourned.)

16   I, Monica Hahn, do hereby certify the foregoing

17   to be a true and accurate verbatim transcription of the

18   original stenographic record.

19   _____

20   Monica Hahn

21   Senior Court Reporter

22

23

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25

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Exhibit F

Expert Report
Thomas J. Sugrue
November 17, 2025

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

---X

Michael Williams, José Ramírez-Garofalo, Aixa Torres, and
Melissa Carty,

Petitioners,

-against-

Board of Elections of the State of New York; Kristen
Zebrowski Stavisky, in her official capacity as Co-Executive
Director of the Board of Elections of the State of New York;
Raymond J. Riley, III, in his official capacity as Co-Executive
Director of the Board of Elections of the State of New York;
Peter S. Kosinski, in his official capacity as Co-Chair and
Commissioner of the Board of Elections of the State of New
York; Henry T. Berger, in his official capacity as Co-Chair
and Commissioner of the Board of Elections of the State of
New York; Anthony J. Casale, in his official capacity as
Commissioner of the Board of Elections of the State of New
York; Essma Bagnuola, in her official capacity as
Commissioner of the Board of Elections of the State of New
York; Kathy Hochul, in her official capacity as Governor of
New York; Andrea Stewart-Cousins, in her official capacity
as Senate Majority Leader and President *Pro Tempore* of the
New York State Senate; Carl E. Heastie, in his official
capacity as Speaker of the New York State Assembly; and
Letitia James, in her official capacity as Attorney General of
New York,

Respondents,

-and-

Representative Nicole Malliotakis, Edward L. Lai, Joel
Medina, Solomon B. Reeves, Angela Sisto, and Faith Togba

Intervenor-Respondents.

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Index No. 164002/2025

Expert Report of Thomas J. Sugrue

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EXPERT REPORT OF THOMAS J. SUGRUE

STATEMENT OF QUALIFICATIONS

1.   My name is Thomas J. Sugrue. I am Silver Professor of History and Social and Cultural Analysis at New York University (NYU), where I have been a member of the faculty since 2015. I am the director of NYU's Urban Studies Program and the NYU Cities Collaborative. I am also an affiliated faculty member in NYU's Wagner School of Public Service and in NYU's Department of Sociology. Prior to teaching at NYU, I was a member of the faculty at the University of Pennsylvania from 1991 to 2015, where I rose to be David Boies Professor of History and Sociology and the founding director of the Penn Social Science and Policy Forum. I graduated with a B.A. in history, Summa Cum Laude, from Columbia University in 1984. I received a second B.A., Honours, in 1986 from Cambridge University. I was awarded an M.A. degree from Cambridge University in 1990. I earned an A.M. and a Ph.D. degree in history from Harvard University in 1987 and 1992, respectively. A detailed record of my professional qualifications, including a list of publications, awards, and professional activities, is set forth in the curriculum vitae attached as Appendix 1.

2.   My scholarship is interdisciplinary, informed by research in history, sociology, and political science. I have written extensively on the topic of race relations, with special attention to the status, perception, and treatment of minorities over the last century. I have also written about the economic, political, and social roots of racial inequality and poverty in the United States. In addition, I have researched the history of cities and suburban areas in the United States, including New York City. I have also written about the impact of immigration on American metropolitan areas, and, as part of a project funded by the Andrew Mellon Foundation, on diversity and inequality in the United States.

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3.   I am the single author of three books on race, politics, and modern American history; the co-author of a book on the history of the United States since the 1890s; editor of a forthcoming book on the history of public policy and segregation; and co-editor of five books on topics including race and inequality; urban history; suburbanization; immigration; and urban political economy. My first book, *The Origins of the Urban Crisis: Race and Inequality in Postwar Detroit*, was published by Princeton University Press in 1996 and won four major awards, including the 1998 Bancroft Prize in American History. It was reprinted in a new edition in 2005, with a new preface. It was reprinted again in 2014 as part of the Princeton Classics series with another new preface. My 2008 book, *Sweet Land of Liberty: The Forgotten Struggle for Civil Rights in the North*, published by Random House, examines the history of racial discrimination, segregation, and inequality in housing, education, employment, policing, and politics throughout the North, and the history of efforts to challenge racial inequalities through political mobilization and protest, legislation, litigation, policymaking, and electoral politics. That study includes New York City. I have co-edited *The New Suburban History* (2005), which concerns, among other topics, race, housing, and immigration in suburbia. My other books include *Immigration and Metropolitan Revitalization in the United States* (co-edited with Professor Domenic Vitiello), published by the University of Pennsylvania Press in 2017; *Neoliberal Cities* (co-edited with Professor Andrew Diamond), published by NYU Press in 2020; *The Long Year: A 2020 Reader* (co-edited with Professor Caitlin Zaloom), published by Columbia University Press in 2022; and *Segregating Cities*, forthcoming from the University of Chicago Press.

4.   My research has been supported by grants and fellowships from several foundations and academic research institutions, including the Carnegie Corporation of New York, the Andrew Mellon Foundation, the John Simon Guggenheim Memorial Foundation, the Social Science

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Research Council, the American Council of Learned Societies, the American Philosophical Society, the Institute for Advanced Study in Princeton, the Brookings Institution, the National Endowment for the Humanities, and the Alphonse Fletcher Foundation. In 2016, I was elected the Walter Lippmann Fellow of the American Academy of Political and Social Science. I am also an elected fellow of the American Academy of Arts and Sciences, the Society of American Historians, the Royal Historical Society (U.K.), and the New York Institute for the Humanities. I am past President of the Urban History Association and also of the Social Science History Association. I serve on the Board of Trustees of the Russell Sage Foundation and the Advisory Council of the Canadian Institute for Advanced Research (CIFAR).

5. I have served as an expert witness in the past. I prepared three reports, was deposed and testified in *New York Communities for Change v. County of Nassau*, No. 602316/2024 (Sup. Ct., Nassau County 2025). I prepared two reports, was deposed, and testified in *Flores v. Town of Islip*, 448 F.Supp.3d 267 (E.D.N.Y. 2020). I prepared a report and was deposed in *Priorities USA v. Nessel*, 628 F.Supp.3d 716 (E.D. Mich. 2022). I prepared a report and was deposed in *U.S. v. City of Eastpointe*, 378 F.Supp.3d 589 (E.D. Mich. 2019). I prepared a report and was deposed in *Adkins v. Morgan Stanley*, 307 F.R.D. 119 (S.D.N.Y. 2015). I prepared a report, was deposed, and testified in *United States v. City of Euclid*, 523 F.Supp.2d 641 (N.D. Ohio 2007). In addition, I prepared a report for *Gratz v. Bollinger*, 122 F.Supp.2d 811 (E.D. Mich. 2000) and for *Grutter v. Bollinger*, 137 F. Supp. 2d 821 (E.D. Mich. 2001).

SCOPE OF REPORT

6. At the request of counsel representing the plaintiffs in this case, I have conducted research on historical and current patterns of racial discrimination, racial segregation, and racial disparities in socio-economic status in New York City, with a focus on Richmond County (Staten

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Island). I have focused my report on those areas that are known to have a meaningful effect on political participation, including the totality of the circumstances factors set forth in the New York Voting Rights Act. I am being compensated at a rate of $550/hour plus expenses for my work in connection with this matter. My compensation is unaffected by the expert opinions and conclusions that I reach.

7.   My report is based on my extensive research on Staten Island using U.S. Census data from various years, public records, other statistical reports from various years, local newspapers, court cases, and relevant historical and social scientific studies and research reports. I reserve the right to amend or supplement my report to the extent necessary.

SUMMARY OF CONCLUSIONS

8.   Staten Island has a long history of racial segregation, discrimination, and disparate treatment against Blacks and Latinos. As a result, significant disparities persist today between these groups and white residents with regards to housing, education, socioeconomic status, and policing – all of which are known to have a negative impact on political participation and the ability to influence elections. Specifically:

- Racial segregation and discrimination are long-running. They persist in Staten Island up to the present day. Unaddressed historical patterns as well as ongoing and pronounced racial divisions contribute to current disparities between whites, Blacks, and Latinos on the Island.

- Blacks and Latinos on Staten Island are segregated residentially. That segregation is worse today than it was forty years ago.

- Black and Latino residents of Staten Island have faced incidents of racial harassment in their daily lives, including in schools, by police, and in the housing

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market.

- Black and Latino residents of Staten Island have been the targets of hate crimes and xenophobia. Recently, immigrants of Latin American origin on Staten Island have been the target of hostile protests and sometimes violence.

- Measures of socioeconomic status by race and ethnicity in Staten Island diverge sharply. Latinos and Blacks have higher rates of poverty and unemployment and lower incomes than whites.

- Latinos and Blacks are far more likely than whites to rent their homes.

- Latinos and Blacks also have significantly lower rates of educational attainment.

- The New York Police Department has a history of tense community relations with Staten Island's Black and Latino residents.

- Staten Island has a history of discriminatory voting practices and appeals to racism in political campaigns, which have further marginalized and disadvantaged Black and Latino communities.

BACKGROUND

9.   Richmond County, New York comprises the entirety of Staten Island, the smallest of New York's five boroughs, covering 57.5 square miles.[1] When it was annexed by New York City in 1898, Staten Island was a mostly rural area. At that time, the Island was overwhelmingly white, though there was an African-American community in Sandy Ground, the oldest free Black settlement on the East Coast, founded by former enslaved people from Maryland in 1828—the year after New York State abolished slavery.[2] Some Blacks also lived on the North Shore in the

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[1] Profile: Richmond   County,   New   York,   U.S.   Census   Bureau, https://data.census.gov/profile?q=richmond+county,+new+york.
[2] Minna C. Wilkins, "Sandy Ground: A Tiny Racial Island," 7 *Staten Island Historian* 1, 2–10 (Summer-Fall 1989); Howard Weiner, "Sandy Ground," *Encyclopedia of the City of New York*, ed. Kenneth T. Jackson 1040-104 (New

nineteenth century, especially in the Stapleton area (home to Stapleton AME Church, the borough's oldest Black church).[3]

10.   Staten Island rapidly expanded, mainly after World War II, though its non-white population remained very small until the end of the twentieth century.[4] The Island's growth was spurred by transit links to other parts of New York City, most importantly the Staten Island Ferry which has connected Richmond County to Lower Manhattan for over 200 years, and which now operates on a twenty-four hour schedule, and the Verrazano Narrows Bridge, which opened in 1964, connecting Brooklyn and points distant to Staten Island by car and truck. The opening of the bridge coincided with racial conflict and white flight from Brooklyn. As a result, Staten Island attracted tens of thousands of white newcomers who were attracted to the Island's new housing and its overwhelmingly white neighborhoods. Staten Island went through a real estate boom and experienced a remarkable growth rate of 33 percent between 1960 and 1970.[5]

11.   Staten Island's racial and ethnic composition has changed significantly since the late twentieth century. In its overview of the most recent decennial census, the New York City Planning Department reported that "Staten Island has experienced net outflows of the White population in the past four decades," while its number of non-white residents has increased significantly, especially its Latino population, which "has grown consistently throughout the last four decades through both natural increase and net migration."[6]

Haven: Yale University Press, 1993); Carolina Bank Muñoz, Penny Lewis and Emily Tumpson Molina, *A People's Guide to New York City* 309-310 (Berkeley: University of California Press, 2022).

[3] Muñoz et al, *People's Guide*, 316-317.

[4] Charles L. Sachs, "Staten Island," in *Encyclopedia of the City of New York*, ed. Kenneth T. Jackson 1112-1118 (New Haven: Yale University Press, 1993).

[5] Daniel C. Kramer and Richard M. Flanagan. *Staten Island: Conservative Bastion in a Liberal City* 5 (Lanham, MD: University Press of America, 2012); Muñoz, *supra* n.2, chapter 5; Anne Marie Barron, "How the Verrazzano-Narrows Bridge Changed Everything for Staten Island's Population," SI Live, November 18, 2024, https://www.silive.com/news/2024/11/how-one-bridge-changed-everything-for-staten-islands-population.html.

[6] New York City, Department of City Planning, Population Division, *Stability and Change in NYC Neighborhoods, 2010-2020* (March 20, 2023), https://storymaps.arcgis.com/stories/c7bf9175168f4a2aa25980cf31992342.

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12.	Demographic changes have been particularly pronounced since 1980 (Figure 1). In 1980, Staten Island had a total population of 352,121. It was 85.3 percent white; 7 percent Black; 5.4 percent Latino; and 1.9 percent Asian. Compared to the other four New York City boroughs, Staten Island was an outlier. None of the others were close to majority white.[7]

13.	Today, 492,734 people live on Staten Island.[8] The population has grown increasingly diverse since 1980. Today, it is 56.6 percent white, 19.5 percent Latino, and 9 percent Black.[9] Twelve percent of Staten Island residents are of Asian descent. The remaining 2.9 percent is mostly people who consider themselves members of two or more races; Staten Island has very few Native Americans, Native Hawaiians, or Pacific Islanders.[10] Staten Island is still the whitest of the five boroughs, but it now more closely resembles Manhattan than any other borough in its demographics.[11]

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[7] U.S. Census Bureau, *1980 Census of Population, Vol. 1: Characteristics of the Population, Part 34: New York* (Washington, DC: U.S. Government Printing Office, 1982),

[8] All data in this paragraph come from U.S. Census Bureau, American Community Survey, Five-Year Estimates, 2019-2023. Hereafter U.S. Census, ACS, 2019-23. Data are for white alone, black alone, and Latino, who may be of any race. Data for figures throughout this report were collected using Social Explorer, https://www.socialexplorer.com/.

[9] A note on language: this report will use the term Latino to refer to Americans of Latin American descent, except when quoting from sources. The U.S. Census Bureau, many scholars, and citizens use both the terms Latino and Hispanic. Older sources sometimes use the vague terms Spanish or Spanish-American and more recent authors sometimes use sex neutral language Latino/a/s or the gender-neutral terms Latinx or Latine. This report will use Black and African American, two terms also regularly used in the Census Bureau and by scholars, unless quoting from other sources.

[10] 2.2 percent of Staten Island residents are of "two or more races." 0.5 percent fall into the category "some other race alone." Only 0.2 percent of Staten Island residents are American Indian or Native Alaskan; a negligible percent are Hawaiian or Pacific Islander.

[11] NYU Furman Center, *New York City Neighborhood Data Profiles, 2024,* https://furmancenter.org/neighborhoods/.

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Figure 1: Percentage of Whites, Blacks, and Latinos in Staten Island, 1980 to 2019-2023
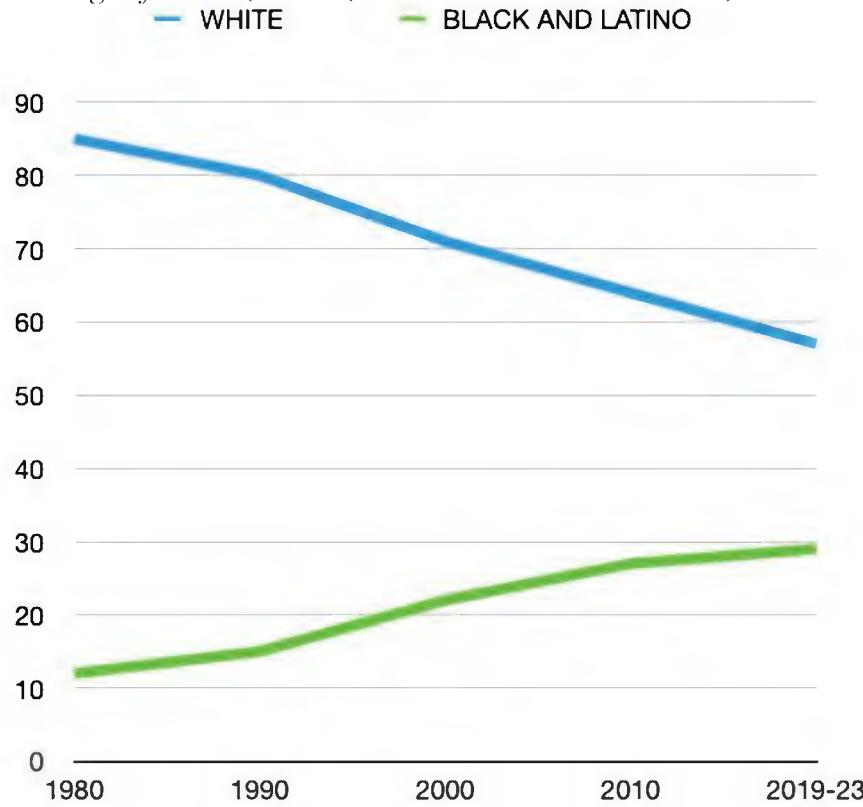
14.   The diversification of Staten Island is evident in the city's streetscapes. Mexican and Dominican businesses have revived Port Richmond Avenue's business district.[12] Also on the North Shore, the Park Hill section of Clifton is known as Little Liberia, with a vibrant street market and Liberian restaurants that serve a community of several thousand people, many of whom came to Staten Island in the 1990s and 2000s as refugees from the West African country's civil wars.[13]

RACIAL SEGREGATION ON STATEN ISLAND

15.   Staten Island has long been one of most racially segregated areas in the United

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[12] Judith Adler Hellman, *The World of Mexican Migrants: The Rock and the Hard Place* (New York: New Press, 2008), 174-77; CeFaan Kim, "Mexican Community in Port Richmond Celebrates Culture, Heritage on Independence Day,"*ABC7 New York*, September 16, 2025. https://abc7ny.com/post/staten-island-celebrates-mexican-independence-day-events-during-hispanic-heritage-month/17827892/. More broadly, see Domenic Vitiello and Thomas J. Sugrue, *Immigration and Metropolitan Revitalization* (Philadelphia: University of Pennsylvania Press, 2017).

[13] Bernadette Ludwig, "Liberians: Struggles for Refugee Families," in *One Out of Three: Immigrant New York in the Twenty-First Century*, ed. Nancy Foner (New York: Columbia University Press, 2013), 200-222; Alyssa Ammirati, "'Little Liberia Way' is More than Just a Street Name to Community in Clifton," *Staten Island Advance*, May 2, 2025.

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States and remains so, despite its diversity. The evidence of racial discrimination and residential segregation against Blacks and Latinos in Richmond County, as this report will document, is overwhelming.

A. Racial Divisions on Staten Island

16. Staten Island has a distinctive racial and ethnic geography. Most Blacks and Latinos live in the northern third of the Island; most whites live in the southern two-thirds. The North Shore, which centers around the Staten Island Ferry Terminal, has some of the borough's oldest housing stock, many apartment buildings, and most of the Island's public housing projects.

17. Neighborhoods to the south of the Staten Island Expressway—in Mid-Island and South Shore—are more suburban in character, dominated by single-family homes built since the 1950s. The southern neighborhoods of Staten Island remain overwhelmingly white.

18. Maps offer a clear picture of Staten Island's racial and ethnic divisions. Figure 2 shows concentrations of Black residents in Staten Island since 1990. In 1990, Black residents were disproportionately clustered on the North Shore, largely above the Staten Island Expressway, the black line on the map. Sandy Ground, one of the few Black communities in the southwestern section of the Island, was largely destroyed by a fire in 1964, dispersing its Black population. Today it has been rebuilt and has few Black residents.[14]

19. At the end of the twentieth century and into the twenty-first, Staten Island's Black population grew larger and denser but remained disproportionately concentrated in the same North Shore neighborhoods. Many lived in neighborhoods near postwar public housing projects. Some Blacks dispersed south of the Staten Island Expressway, mostly to older neighborhoods that had fallen out of fashion among whites.

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[14] Weiner, "Sandy Ground;" Tracey Porpora, "Bulldozers Rule in Shrinking Sandy Ground," *Staten Island Advance*, May 10, 1999.

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20.   Figure 3 shows concentrations of Latino residents in Staten Island since 1990. Here too we can see certain patterns very clearly. Over more than three decades, Staten Island's Latinos have been disproportionately concentrated in North Shore neighborhoods—often living in close proximity to Blacks. This is a common pattern in many urban areas where Blacks and Latinos experience socio-economic disparities. Members of both groups are more likely to have less education, higher rates of unemployment and poverty, and fewer choices in racially segregated housing markets (all discussed at greater length below). Staten Island Latinos also began to move into more dispersed tracts south of the Staten Island Expressway, especially after 2010, largely into neighborhoods that have recently experienced white flight.

21.   A comparison of Figures 2 and 3 shows significant congruence between Black and Latino residential patterns on Staten Island. Members of both groups tend to live in areas with older housing stock, apartment buildings, and public housing developments.

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Figure 2: Black Population on Staten Island, 1990 to 2019-2023[15]

1990

2000

2010

2023

Insufficient data
< 10%
10% to 25%
25% to 40%
40% to 60%
60% to 75%
75% to 90%
> 90%
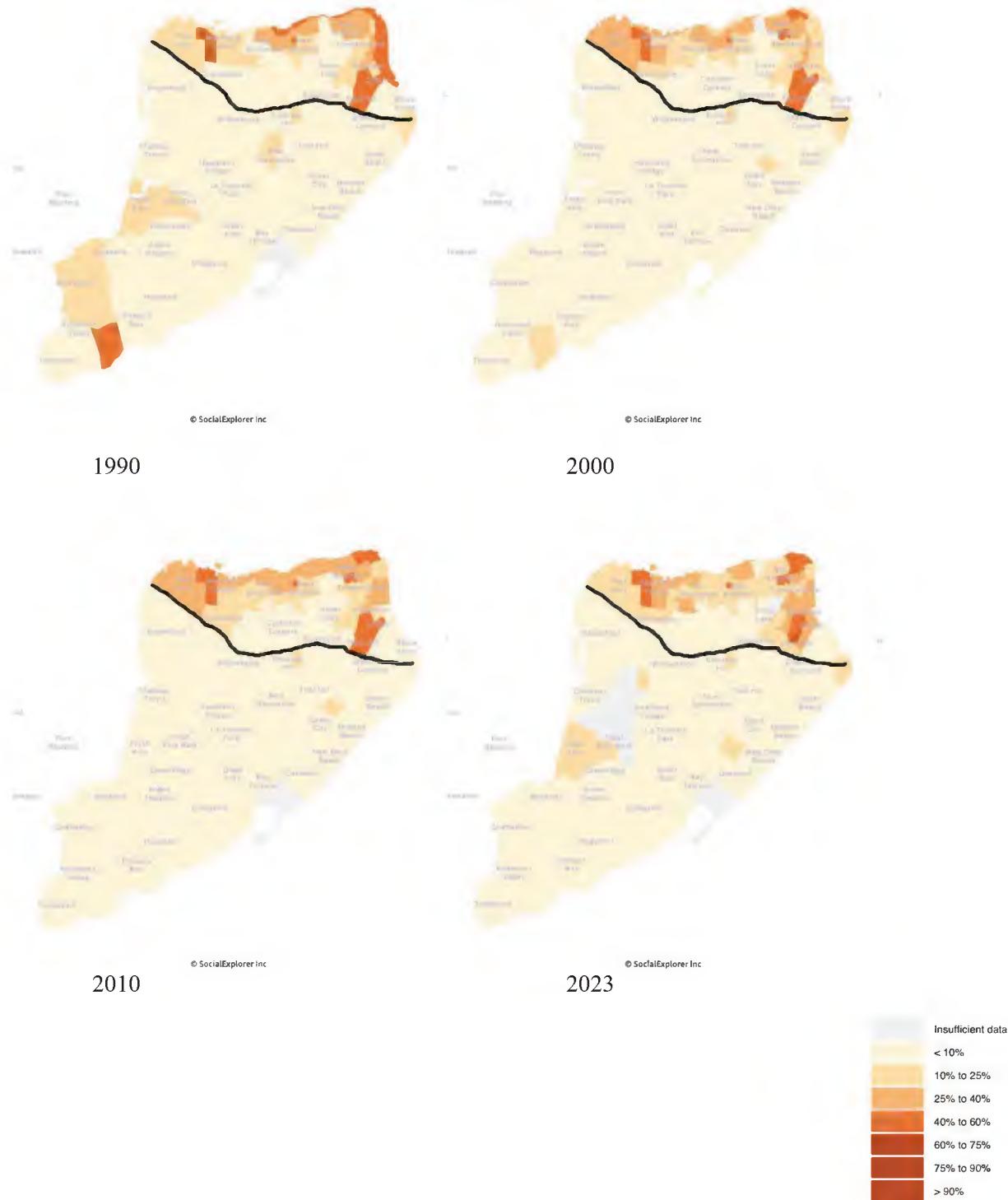
[15] Map prepared by author using U.S. Census, 1990, 2000–2010, and U.S. Census, ACS, 2019–2023. The Staten Island Expressway is marked in black.

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Figure 3: Latino Population on Staten Island, 1990 to 2019-2023[16]

1990

2000

2010

2023

Insufficient data
< 10%
10% to 25%
25% to 40%
40% to 60%
60% to 75%
75% to 90%
> 90%

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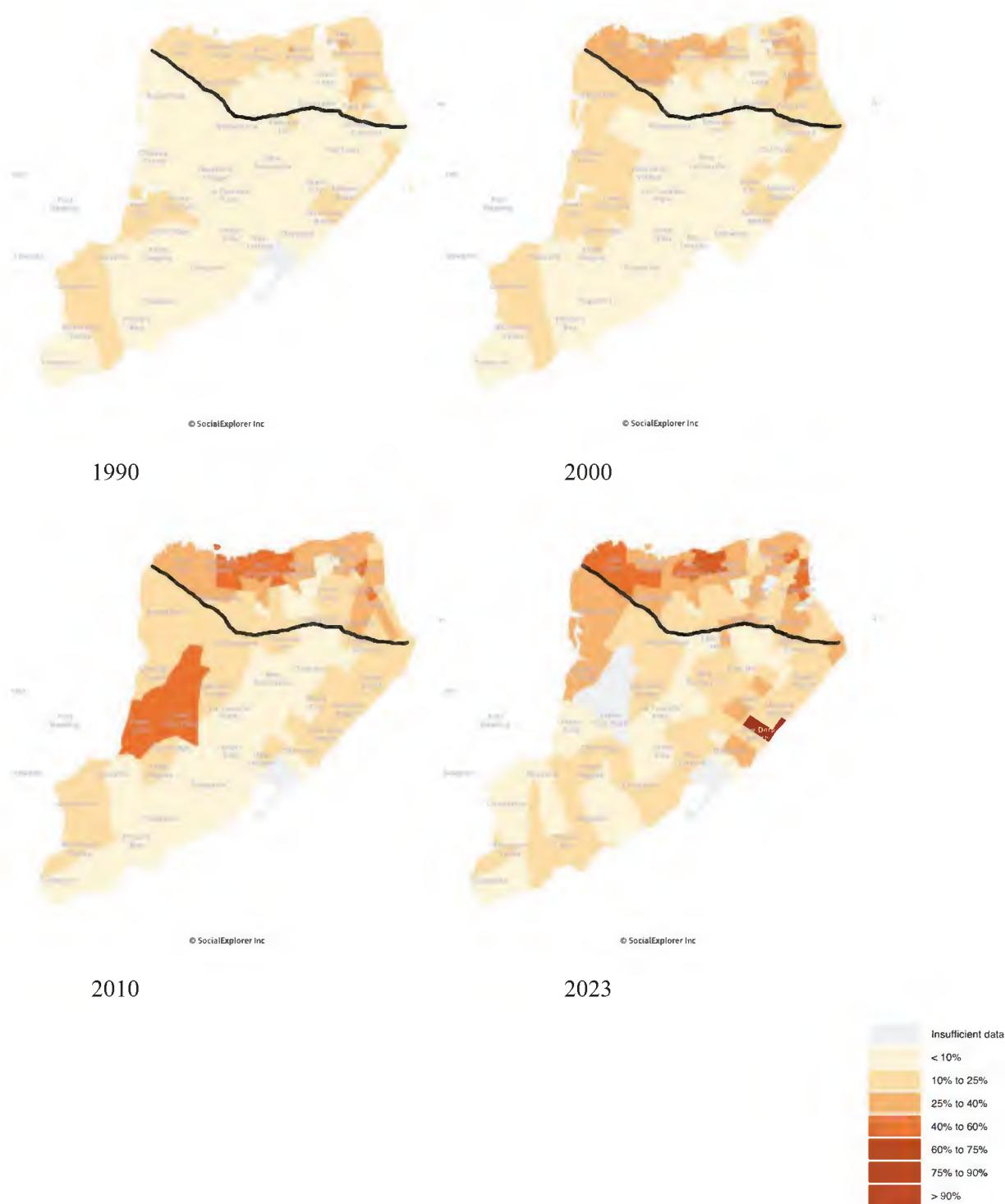
[16] Map prepared by author using U.S. Census, 1990, 2000–2010, and U.S. Census, ACS, 2019–2023. The Staten Island Expressway is marked in black.

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22.   At least since the 1980s, minorities on Staten Island have complained that the Staten Island Expressway served as an informal racial barrier. Blacks seeking houses in predominantly white sections on Staten Island regularly experienced discrimination.[17] In a 1987 public meeting about housing opportunity on the island, for example, participants "complained that blacks seeking housing are generally unwelcome in neighborhoods south of the Staten Island Expressway."[18] Since at least the late 1980s, many Staten Island residents have called the Staten Island Expressway the "Mason Dixon line," because it divides the predominantly white southern part of the island from its increasingly racially diverse northern section.[19] A recent report in the Manhattan Institute's *City Journal* captures the ongoing salience of Staten Island's sharp geographic divide. "The borough's north shore, which includes the ferry terminal, resembles the rest of New York City, with concentrations of black, Latino, and Asian New Yorkers. Staten Island becomes most distinctive in its southern two-thirds, below the Staten Island Expressway, which local wags sometimes call the Mason-Dixon line."[20] The further south one heads in Staten Island, the whiter it becomes. In 1990, less than one percent of residents in Staten Island Community Board (CB) 3,

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[17] See for example, Anne Fanciullo, "Group Urges More Housing Integration," *Staten Island Advance*, May 17, 1981 (noting that 87.5 percent of the island's Blacks lived north of the Staten Island Expressway, and that of the small number of Blacks to the south, more than 8 percent were children in a single medical institution); "Staten Island is 'More Racist than Any City Down South,'" *Staten Island Advance*, November 28, 1983; "Equal Housing, Jobs Among the Priorities of Island NAACP," *Staten Island Advance,* February 27, 1984.

[18] "Black Leaders Cite North Shore Race Woes," *Staten Island Advance*, September 20, 1987.

[19] For references to the Mason-Dixon line, see Bill Stephens, "Panelists Outline Ways to Fight Housing Discrimination," *Staten Island Advance*, April 19, 1989; Joseph Berger and Ian Urbina, "Along with Population and Diversity, Stress Rises on Staten I." *New York Times*, September 25, 2003. "Staten Island's Mason-Dixon Line," *Stat Island*, n.d. [ca. 2013], http://statisland.com/mason_dixon.html; Ashley Halsey III, "A Crusade of Defeat the Legacy of Highways Rammed Through Poor Neighborhoods," *Washington Post*, March 29, 2016, https://www.washingtonpost.com/local/trafficandcommuting/defeating-the-legacy-of-highways-rammed-through-poor-neighborhoods/2016/03/28/ffcfb5ae-f2a1-11e5-a61f-e9c95c06edca_story.html; Major Danny Sjursen, "Disturbing Deep-Rooted Patterns in Staten Island's Racial Geography," *SI Live*, May 22, 2017, https://www.silive.com/news/2017/05/disturbing_deep-rooted_pattern.html; Sydney Kashiwagi, "A New Generation of Leadership on Staten Island's North Shore," *City & State New York*, November 16, 2020. https://www.cityandstateny.com/politics/2020/11/a-new-generation-of-leadership-on-staten-islands-north-shore/175451/.

[20] Seth Barron, "New York's Red Borough," *City Journal* (Winter 2018), https://www.city-journal.org/article/new-yorks-red-borough.

which includes Tottenville and Great Kills, on the southern third of the island, were Black.[21] In 2023, still only one percent of CB 3's population is Black.[22]

B. Statistical Measures of Residential Segregation

23.   Maps provide a bird's eye view of Staten Island's racial and ethnic residential patterns, but using demographic data, we can measure segregation by race and ethnicity with great precision. The index of dissimilarity, the most commonly used measure of racial segregation, provides clear evidence of racial segregation between whites and non-white groups in Richmond County spanning a several-decade period. The index of dissimilarity measures the evenness of a population's distribution across the county. In simpler terms, the index of dissimilarity is a calculation of the percentage of a minority group that would have to move for the distribution of the group in every area to be the same as their representation in the overall population of the county. The index of dissimilarity ranges from 0-100 (not segregated to totally segregated).[23]

24.   The U.S. Department of Housing and Urban Development (HUD) specifies that a community with a dissimilarity value of **40 or below** is considered to have a **low** level of racial segregation; a range from **40-55** indicates **moderate** segregation; any value **above 55** is considered a **high** degree of segregation.[24]

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[21] Richard Mudgett, "We Must End De Facto Housing Discrimination," *Staten Island Advance*, November 3, 1992.

[22] NYU Furman Center, Neighborhood Profiles, Staten Island, Neighborhood Indicators, Tottenville/Great Kills, SI03, https://furmancenter.org/neighborhoods/view/tottenville-great-kills.

[23] The classic study using indices of dissimilarity is Karl Taeuber and Alma Taeuber, *Negroes in Cities: Residential Segregation and Neighborhood Change* (Chicago: Aldine Publishing Company, 1965); the classic recent work is Douglas S. Massey and Nancy A. Denton, *American Apartheid: Segregation and the Making of the Underclass* (Cambridge: Harvard University Press, 1993). On Latino segregation, *see* Mary J. Fischer and Marta Tienda, "Redrawing Spatial Color Lines: Hispanic Metropolitan Dispersal, Segregation, and Economic Opportunity," in *Hispanics and the Future of America*, ed. Marta Tienda and Faith Mitchell (Washington, DC: National Academies Press, 2006); Daniel T. Lichter, Domenico Parisi, Michael C. Taquino, and Steven Michael Grice, "Residential Segregation in New Hispanic Destinations: Cities, Suburbs, and Rural Communities Compared," *Social Science Review* 39 (2010): 215–230; Jacob Rugh and Douglas S. Massey, "Segregation in Post-Civil Rights America: Stalled Integration or End of the Segregated Century?" *Du Bois Review* 11:2 (2014): 205–232.

[24] U.S. Department of Housing and Urban Development (hereafter HUD), HUD Exchange, Lessons from the Ground: Best Practices in Fair Housing Planning, https://www.hudexchange.info/programs/fair-housing/best-practices-in-fair-housing-planning/analyzing-data/identifying-areas-of-segregation-integration-and-concentrated-poverty/.

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25.   Using decennial U.S. Census Bureau data from 1990, 2000, 2010, and the most recent data from the Census Bureau's *American Community Survey*, 2019-2023, I calculated the index of dissimilarity for Blacks and whites and Latinos and whites in Richmond County (Figure 4). These data allow us to assess the degree of racial segregation in the present and then look to larger patterns spanning one third of a century.

26.   Today, Blacks in Staten Island experience a high degree of segregation and Latinos experience a moderate degree of segregation.

Figure 4: Residential Segregation on Staten Island, 1990 to 2019-2023[25]

	1990	2000	2010	2019-2023
White/Black Dissimilarity	72	72	72	75
White/Latino Dissimilarity	35	42	47	42

27.   Staten Island's current white-Black index of dissimilarity is **75**, meaning that it is very highly segregated.

28.   Staten Island's current white-Latino index of dissimilarity is **42**, which ranks as moderately segregated.

29.   Historical data on dissimilarity provides further insight into patterns of segregation in Staten Island over time. The indices of dissimilarity for the period beginning in 1990 demonstrate clearly that racial and ethnic segregation has persisted in Richmond County over more than three decades. Black-white segregation has been consistently high; in fact, it has worsened since 2010. Between 1990 and 1990–2023, the rate of Black-white segregation ranged from a low of 72 to a high of 75.

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[25] Index calculated by author from tract level data from U.S., 1990, 2000, 2010, and U.S. Census, ACS, 2019–23, using U.S. Department of Housing and Urban Development, Dissimilarity Calculator Tool: https://www.hudexchange.info/resource/6870/lessons-from-the-ground-best-practices-in-fair-housing-planning-dissimilarity-index/. Note: Since the author downloaded the Dissimilarity Calculator Tool, the Trump administration has removed links to it and other fair housing materials from the HUD website.

30.   Between 1990 and 2023, Latino-white segregation has fluctuated from a low of 35 to a high of 47. In 1990, the Latino-white segregation rate on Staten Island was low. It rose to the moderate range in 2000 and has remained there since.

C. Public Policy, Real Estate Practices, and Housing Segregation

31.   What explains persistent or worsening racial and ethnic segregation in Staten Island? One commonplace explanation for such segregation generally asserts that racial or ethnic group members prefer to self-segregate, often expressed in conventional wisdom that "birds of a feather flock together." While there is some evidence that members of extended families or immigrants from the same town or village of origin sometimes move to neighboring homes, there is abundant counterevidence. Political scientist Lawrence Bobo found that "[o]nly a trivial percentage of blacks, Hispanics, and Asians express objection to living in a largely white neighborhood," a finding echoed by other demographers and sociologists.[29]

32.   Residential segregation is not solely or primarily the sum of individual choices about where to live. Rather it has been shaped by:

   a. historical and ongoing discrimination and the stigmatization of people considered to be non-white;

   b. federal and local housing policies that created and maintained racial segregation and their legacy;

   c. past and ongoing discriminatory practices by real estate brokers, landlords, and mortgage lenders.

I will consider each of these in detail now.

33.   ***Historical and ongoing discrimination.*** Staten Island whites expressed opposition to the presence of Blacks in otherwise all-white areas beginning with the first Great Migration of

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Blacks to the North, during the 1920s. Staten Island, though it has a very small Black population,

became the site of a nationally infamous incident in 1924 and 1925, when Samuel Browne, a Black

postal worker and his wife, a school teacher, and their two children moved into a single family

home that they had purchased in West New Brighton. A local developer and a prominent real estate

broker first attempted to buy out the Brownes, who rebuffed their offers.[26] After the Brownes

refused, a crowd of forty white neighbors gathered in front of the house to protest. Vandals attacked

the property, throwing stones and pulling out the shrubbery.[27] The Brownes also received threats

from the Ku Klux Klan, which was then at its peak of membership—including in New York, where

it had prominent chapters in New York City and Nassau and Suffolk Counties.[28] The Browne case

led to the formation of the Staten Island Branch of the National Association for the Advancement

of Colored People, the leading civil rights organization of the twentieth-century, known for its

litigation against discriminatory practices in real estate, public education, and public

accommodations.[29]

34. ***Federal Housing Policies, including redlining.*** A series of federal housing

programs, first enacted in the 1930s and early 1940s, reinforced discriminatory real estate and

lending practices and systematically excluded African Americans from large parts of the

metropolitan New York area, including large parts of Staten Island. The Federal Home Loan Bank

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[26] "Negroes Blame Klan for Race Troubles; Samuel Brown Tells Mass Meeting of Effort to Drive Him Out of Staten Island Home," *New York Times*, September 21, 1925,
https://www.nytimes.com/1925/09/21/archives/negroes-blame-klan-for-race-troubles-samuel-brown-tells-mass.html.

[27] "Staten Islanders Object to Negro Moving into Home," *New York Age*, September 6, 1924; "Negro Vindicated' in Clash with Whites," *St Louis Post-Dispatch*, August 22, 1925.

[28] "Ku Klux Klan Threatens to Drive Family From White Neighborhood," *Pittsburgh Courier*, September 19, 1925; "Negroes Blame Klan for Race Troubles; Samuel Browne Tells Mass Meeting of Effort to Drive Him Out of Staten Island Home," *New York Times*, September 21, 1925. The Klan operated in New York City and was particularly strong on Long Island. See David M. Chalmers, *Hooded Americanism: The History of the Ku Klux Klan*, Third Edition (Durham: Duke University Press, 1987), 254-58.

[29] New York City Council, Minutes of the Proceedings for the Stated Meeting (October 31, 2017), 3818, https://www.nyc.gov/assets/dcas/downloads/pdf/cityrecord/stated-meetings/2017/stated_meeting_2017_10_31.pdf.

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Board (1932), the Home Owners' Loan Corporation (1933), the Federal Housing Administration (1934), and the Veterans Administration (1944) all dramatically expanded white consumers' access to credit for the purchase and improvement of homes. But all of these federal housing programs translated private discrimination into public policy, and officially ratified the exclusionary practices of brokers, developers and banks.[30] These federal housing agencies prevented most Blacks and Latinos from obtaining federally backed home loans and mortgages for more than a third of a century, between 1932 and 1968.

35.   The key instrument of segregation by federal housing agencies was a system to rank neighborhoods by their "risk," first developed by the Home Owners' Loan Corporation (HOLC). The ranking system "influenced national lending policy by disadvantaging entire communities it deemed a hazardous bank investment."[31] The HOLC ranked neighborhoods, based on detailed "area descriptions" that included an overview of housing stock and infrastructure, proximity to industry, and, most importantly, the racial, ethnic, and socio-economic characteristics of area residents. When the HOLC evaluated the residential desirability of urban property, writes historian Louis Lee Woods, "race, ethnicity, and class were so influential that when analyzing a neighborhood's desirability, they surpassed all other appraisal considerations."[32]

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[30] There is a large body of historical scholarship on this topic. See LaDale C. Winling and Todd M. Michney, "The Roots of Redlining: Academic, Governmental and Professional Networks in the Making of the New Deal Lending Regime," *Journal of American History* 108 (2021), 42-69; Todd M. Michney and LaDale C. Winling. "New Perspectives on New Deal Housing Policy: Explicating and Mapping HOLC Loans to African Americans," *Journal of Urban History* 46 (2020), 150-80; Louis Lee Woods, II, "The Federal Home Loan Bank Board, Redlining, and the National Proliferation of Racial Lending Discrimination, 1921–1950," *Journal of Urban History* 38 (2012),1036-59; Jennifer Light, "Nationality and Neighborhood Risk at the Origins of FHA Underwriting, *Journal of Urban History* 36 (2010), 634-71; Kenneth T. Jackson, "Race, Ethnicity, and Real Estate Appraisal: The Home Owners' Loan Corporation and the Federal Housing Administration," *Journal of Urban History* 6 (1980), 419-452, and Kenneth T. Jackson, "The Spatial Dimensions of Social Control: Race, Ethnicity, and Government Housing Policy in the United States," in Bruce M. Stave, ed., *Modern Industrial Cities: History, Policy, and Survival* (Beverly Hills: Sage Publishers, 1981), 79-128.
[31] Woods, "Federal Home Loan Bank Board," 1038.
[32] Woods, "Federal Home Loan Bank Board," 1039.

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Figure 5: Federal Home Loan Bank Board Richmond County, New York, Home Security Map, 1940[33]
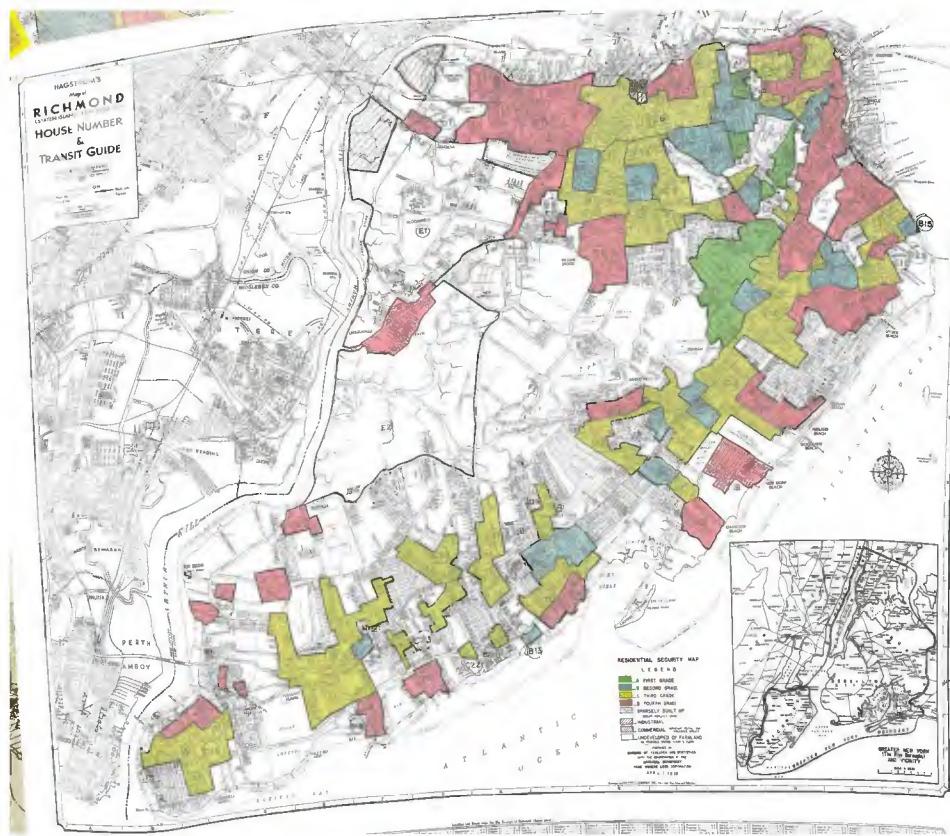
36.   The HOLC rated neighborhoods from "A" through "D" and mapped those neighborhoods using color coding. The top-ranked neighborhoods, "A," were depicted in green on HOLC appraisal maps, and considered the "best" in a city, characterized by large concentrations of "Americans" with high incomes and living in high quality housing. "B" neighborhoods, colored blue on the maps, were "still desirable." "C" neighborhoods, colored yellow, were "definitely declining." And "D" neighborhoods were considered hazardous and colored red on the maps. The

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[33] Federal Home Loan Bank Board, Greater Richmond County, New York Residential Security Map, 1939, National Archives and Records Administration, Record Group 195, scanned and reprinted in Robert K. Nelson, LaDale Winling et al., "Mapping Inequality: Redlining in New Deal America," in *American Panorama: An Atlas of United States History*, 2023: Staten Island, New York: https://dsl.richmond.edu/panorama/redlining/map/NY/StatenIsland/area_descriptions/D5#loc=12/40.5741/-74.1562, hereafter referred to as "Redlining in New Deal America."

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term "redlining" referred to "D" neighborhoods, where residents frequently had difficulty obtaining federally-guaranteed mortgages and conventional mortgages—fifteen to thirty-year mortgages with low down payments and modest interest rates.[34]

37.   In 1940, the HOLC published its Neighborhood Security Map for Richmond County (Figure 5). At that time, Blacks constituted only two percent of Staten Island's population. The appraisers offered positive assessments of Staten Island neighborhoods with many "Americans"—meaning non-immigrants. They sometimes mentioned the presence of German, Scandinavian, and Irish residents favorably. And they often rated areas with large numbers of Italians negatively. But the official map and its accompanying "area descriptions" gave low ratings to every Black community on the island, even including neighborhoods that appraisers predicted would attract Black residents in the future.

38.   Staten Island's oldest Black community, Sandy Ground, had been founded in 1828—the year after New York State abolished slavery. It was home to some of the island's most venerable Black institutions. The HOLC considered it "hazardous," ranked it D, and colored it red on its map. The area description bluntly noted: "Location on the downgrade for years –little hope for recovery." It stated that Sandy Ground "is one of the poorest areas in the entire borough and has practically nothing to recommend it to the outside renter or buyer." Black residents of Sandy Ground lived in dismal conditions in "small frame singles and cottages, generally in fair to poor condition, most of them with outside toilets." Other than the main thoroughfare, "[i]nside streets are poorly surfaced, muddy in wet weather, and have no sidewalks." Sandy Ground had no sewers or gas lines. The report concluded bluntly, "[i]t is difficult to envisage any further decline, but the

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[34] For a description of the maps and their methodology, see Robert K. Nelson, "Introduction," Redlining in New Deal America.

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trend, if any would be downward."[35] Nearby Rossville and Charleston, affected by "Negro infiltration" were also ranked D.[36]

39.   Even overwhelmingly white neighborhoods with just a small Black population— or even the prospect that Blacks might move there in the future—received low ratings. Those included Willowbrook, Miers Corner, and part of West Brighton.[37] The implication that even a few Black residents made a neighborhood undesirable is a reminder of the assumptions of racial inferiority that shaped federal housing policy in the mid-twentieth century.

40.   There is now a substantial body of scholarship by historians, sociologists, public health scholars, and economists demonstrating that redlining in the mid-twentieth century has had long-term impacts on nearly every aspect of community life.[38] Redlined neighborhoods—even those that were mostly white when the maps were composed—are more likely to house non-whites today. Residents of those neighborhoods are more likely to have lower incomes than residents of higher-ranked neighborhoods. By most measures, health outcomes in historically redlined neighborhoods are poor. Redlined neighborhoods are also likely to face environmental hazards, including air pollution, contaminated soil from lead and other chemicals, and other industrial

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[35] Staten Island, New York, Area Description, D-21, Redlining in New Deal America.

[36] Staten Island, New York, Area Descriptions, D-20, D-22, Redlining in New Deal America.

[37] Staten Island, New York, Area Descriptions, D-6, D-8, C-6, C-8, Redlining in New Deal America.

[38] For a survey of the scholarship in a report focusing on New York, see U.S. Commission on Civil Rights, Racial Discrimination and Eviction Policies and Enforcement in New York: A Report of the New York Advisory Committee to the U.S. Commission on Civil Rights, March 2022: 20-24, https://www.usccr.gov/files/2022-03/New-York-Advisory-Committee-Evictions-Report-March-2022.pdf (hereafter referred to as "USCCR, New York Advisory Committee Report"). Major works on the long-term impact of redlining include Daniel Aaronson, Jacob Faber, Daniel Hartley, Bhashkar Mazumder, Patrick Sharkey, "The Long-Run Effects of the 1930s HOLC 'Redlining' Maps on Place-Based Measures of Economic Opportunity and Socioeconomic Success," *Regional Science and Urban Economics* 86 (2021), 103662; Daniel Aaronson, Daniel Hartley, and Bhashkar Mazumder "The Effects of the 1930s HOLC 'Redlining' Maps," *American Economic Journal: Economic Policy* 13.4 (2021), 355–92; Haley M. Lane, Rachel Morello-Frosch, Julian D. Marshall, and Joshua S. Apte, "Historical Redlining Is Associated with Present-Day Air Pollution Disparities in U.S. Cities," *Environmental Science & Technology Letters* 9:4 (2022), 345–350; Carolyn B. Swope, Diana Hernández, and Lara J. Cushing, "The Relationship of Historical Redlining with Present-Day Neighborhood Environmental and Health Outcomes: A Scoping Review and Conceptual Model," *Journal of Urban Health* 99 (2022), 959–983.

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waste. As scholar Melissa Checker shows, there is a high "density of toxic sites with proximity to low-income communities of color" on Staten Island's North Shore.[39]

41. ***Public Housing, Discrimination, and Segregation.*** Discriminatory public housing policies also further segregated Staten Island. While public housing was largely funded by federal agencies, including the U.S. Housing Authority and its successors, including the Public Housing Authority and the Urban Renewal Administration, federal housing officials gave local housing authorities (including the New York City Housing Authority, or NYCHA) the sole power to select project sites and determine the racial composition of housing projects. Across the country, public housing complexes were almost always opened and operated on a segregated basis, following what was called the "neighborhood composition" policy. Projects in racially-mixed or predominantly minority neighborhoods primarily housed Blacks and Latinos; projects in predominately white neighborhoods favored white applicants.[40]

42. Staten Island had eleven NYCHA housing projects: Berry (1950), Cassidy-Lafayette (1971), the Edwin Markham Houses (1943, demolished in 2007),[41] Mariners Harbor (1954), New Lane Area (1984), Richmond Terrace (1964), South Beach (1950), Stapleton (1952), Todt Hill (1950), West Brighton I (1962), and West Brighton II (1966). Today, they house more than 9,000 residents.[42] Figure 6 shows that 7 of the 10 remaining NYCHA developments are located north of the Staten Island Expressway.[43]

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[39] Melissa Checker, *The Sustainability Myth* 2–3, 99–100 New York: NYU Press, 2020). Checker discusses environmental issues on Staten Island's North Shore at length in her book.

[40] Arnold R. Hirsch, "Searching for a 'Sound Negro Policy': A Racial Agenda for the Housing Acts of 1949 and 1954," *Housing Policy Debate* 11:2 (2000): 393-441; Arnold R. Hirsch, "'Containment on the Home Front': Race and Federal Housing Policy from the New Deal to the Cold War," *Journal of Urban History* 26 (2000): 158-189.

[41] The Edwin Markham Homes (later known as Markham Gardens) in West Brighton was built as temporary wartime housing in 1943 and later refurbished. It was demolished in 2007 and replaced by private housing. See Nicholas Dagen Bloom, *When Public Housing Worked: New York in the Twentieth Century* (Philadelphia: University of Pennsylvania Press, 2008), 270.

[42] New York City Housing Authority, Official Map, 2025, https://www.nyc.gov/assets/nycha/downloads/pdf/nychamap.pdf.

[43] New York City Housing Authority, Official Map, 2025; See also Patrick Nugent, "The Urban Environmental Order:

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Figure 6: NYCHA Sites in Staten Island, 2025[44]
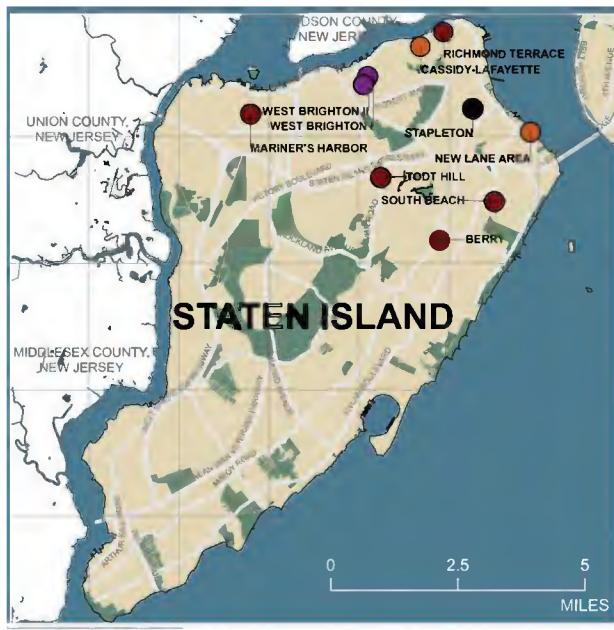
43.   In Staten Island, public officials were sensitive to the concerns of their overwhelmingly white constituents. To avoid controversy, NYCHA located housing projects in neighborhoods that were low ranked by the HOLC. Even though New York had passed a state law forbidding segregation in public housing in 1939, NYCHA also followed the "neighborhood composition rule," which kept most projects segregated by race.[45] In the 1950s and 1960s, NYCHA made efforts to desegregate, but they were seldom successful, especially in the outer boroughs, including Staten Island.[46]

44.   Public housing generated intense opposition on Staten Island. In the early 1960s, Staten Islanders voted against a state referendum to fund more public housing.[47] In 1962, residents of the West Brighton neighborhood protested a proposed housing project to be built near Castleton

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Planning and Politics on Staten Island, 1945-1984" (Ph.D. diss. George Washington University, 2016), 246.

[44] New York City Housing Authority, Official Map, 2025.
[45] Bloom, *When Public Housing Worked*, 86-89.
[46] Bloom, *When Public Housing Worked,* 169-175.
[47] Bloom, *When Public Housing Worked*, 124-125.

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and Broadway.[48] Other affordable housing developments met with equally fierce opposition. In 1965, Staten Island residents vehemently opposed the construction of high rise public housing in the Annadale-Huguenot area, leading New York City to withdraw its plan.[49] Similar fears rose in the Fox Hills area of Clifton, where the construction of new high rise apartments and a new primary school sparked white residents' concerns "that the city will subsidize housing to bring in minority groups from ghetto areas in the city."[50]

45.   Also facing fierce resistance was a city plan to provide *temporary* housing in Staten Island for families from other parts of New York City displaced by urban renewal. The vast majority were non-white. The *Staten Island Advance* editorialized: "The effect on Staten Island would be equally disastrous. We would have put into our midst a homogeneous group that had no ties with the community."[51] As we shall see, Staten Island has a long history of opposition to providing even temporary housing to outsiders, especially racial or ethnic minorities, that has continued up to the present day.

46.   Staten Island's housing projects remained largely segregated in defiance of civil rights laws. In fact, through 1991—decades after state and federal policies forbade discrimination in public housing projects—NYCHA illegally segregated in public housing on Staten Island by giving whites preferences for apartments in projects located in predominantly white neighborhoods. NYCHA's discriminatory practices were the subject of the 1992 federal lawsuit, *Davis v. New York City Housing Authority*, in which the court found "direct evidence of discrimination on Staten Island, such as improper practices at the special Staten Island Applications Office and the failure to report expected vacancies at the largely white Staten Island

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[48] Kramer and Flanagan. *Staten Island*, 54-55.
[49] Kramer and Flanagan, *Staten Island*, 54.
[50] "Fox Hills: Big Plans and Much Denial," *Staten Island Advance*, March 28, 1968.
[51] "Transplant of a Slum," *Staten Island Advance*, August 1, 1967.

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projects." [52] In addition, the court found that "at the six projects where the plaintiffs contend whites received admission preferences, white families constituted almost 70% of the move-ins during that period."[53] These pro-segregation practices reinforced Staten Island's deep racial divisions.

47. ***Discriminatory Real Estate Practices.*** The private real estate industry has long played a crucial role in creating and maintaining residential segregation on Staten Island. Segregation persisted because real estate brokers have often refused to show homes and apartments or offer leases to Blacks and Latinos in white neighborhoods for over a century.[54] Realtors have also engaged in various discriminatory practices that shaped Staten Island's racial and ethnic divides. Unfortunately, discrimination in the sale and rental of properties remains a serious problem in Staten Island today, a century after the Brownes moved to West New Brighton.

48. In 1963, the Staten Island Real Estate Board challenged the constitutionality of New York anti-housing discrimination laws, denounced civil rights organizations that demanded fair housing, and lobbied for a "Property Owner's Bill of Rights" that would permit racial discrimination in home and apartment rentals and sales.[55] New York State and New York City had enacted several civil rights laws beginning in the 1940s, including a citywide ban against housing discrimination passed in 1945. New York incrementally enacted laws forbidding discrimination in private housing in the 1950s and first half of the 1960s. In 1950, the state prohibited discrimination in publicly assisted multiple family housing. In 1951, New York City passed the Brown-Isaacs

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[52] *Davis v. New York City Hous. Auth.*, No. 90 CIV. 0628 (PNL), 1992 WL 420923, at *4 (S.D.N.Y. Dec. 31, 1992).
[53] *Davis v. New York City Hous. Auth.* The year after the case was concluded, the Berry Homes in Dongan Hills was 80 percent white; the Cassidy-Lafayette Houses in New Brighton was 74 percent white; the New Lane Houses in Rosebank was 86 percent white; the South Beach Houses was 72 percent white; the Todt Hill Houses in Castleton Corners was 67 percent white. Brian Larkin, "Families Being Sought in 'Racial Steering Case," *Staten Island Advance*, January 18, 1993. For further details, see Bloom, *When Public Housing Worked*, 323-324, note 30.
[54] These practices originated with the rise of the professional real estate industry nationwide, especially real estate ethics codes that forbade the sale or rental of properties to "incompatible" groups, including Blacks through the mid-twentieth century; and persistent expectations that realtors would protect neighborhood homogeneity. Charles Abrams, *Forbidden Neighbors: A Study of Prejudice in Housing* (New York: Harper and Brothers, 1955); Rose Helper, *Racial Policies and Practices of Real Estate Brokers* (Minneapolis: University of Minnesota Press, 1969).
[55] "Staten Island Realty Board Fights Bias Laws," *New York Amsterdam News*, December 14, 1963.

Law barring discrimination in all publicly assisted private housing, but as historian Martha Biondi

notes: "In the Board of Estimate, only Staten Island voted against it."[56] In 1955, New York State

outlawed discrimination by developers of subdivisions of more than ten units who received

mortgages insured by the federal or state governments. The state enacted laws more broadly

outlawing discrimination in private housing in 1961 and 1964.[57] The federal government followed

suit, enacting Title VIII of the Civil Rights Act, also known as the Fair Housing Act (1968), which

prohibited discrimination in the sale or rental of homes by race, national origin, and other protected

characteristics.[58] For more than four decades, however, public officials, academics, and civil rights

organizations have shown that fair housing laws have seldom been adequately enforced on Staten

Island.[59]

49.   Real estate brokers frequently flouted fair housing laws and developed tactics that

reinforced residential segregation. The first of such tactics was blockbusting, frequently practiced

on Staten Island in the 1960s and 1970s. Blockbusters were brokers who spread rumors that

"undesirable" minorities were moving into white neighborhoods, supposedly threatening whites'

sense of community and their real estate values. Blockbusters used prejudice as a lever to panic

white homeowners into selling low and then converting properties into rental units marketed to

non-white renters or buyers or, in some cases, selling them to Black buyers who were willing to

pay a premium to live in predominantly white neighborhoods.[60]

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[56] Martha Biondi, *To Stand and Fight: Civil Rights in Postwar New York City* (Cambridge: Harvard University Press, 2003), 132.

[57] United States Housing and Home Finance Agency, Intergroup Relations Service, *Fair Housing Laws: Summaries and Text of State and Municipal Laws* (Washington, DC: U.S. Government Printing Office, 1964).

[58] Thomas J. Sugrue, "From Jim Crow to Fair Housing," in Gregory D. Squires, ed., *The Fight for Fair Housing: Causes, Consequences and Future Implications of the 1968 Federal Fair Housing Act* (New York: Routledge, 2018), 14-27.

[59] "Gaeta Renews Efforts to Establish Island Human Rights Office," Staten Island Advance, March 1, 1983; "Tiny Steps of Progress," Staten Island Advance, June 30, 1984; Michael H. Schill, "Local Enforcement of Laws Prohibiting Discrimination in Housing: The New York City Human Rights Commission," Fordham Urban Law Journal 23 (1996) 991-1030; USCCR, New York Advisory Committee Report, 75.

[60] W. Edward Orser, "Blockbusting," in *The Wiley-Blackwell Encyclopedia of Urban and Regional Studies*, ed.

50.   Beginning in the late 1960s, civil rights organizations and neighborhood organizations began complaining about blockbusting, mostly on the North Shore.[61] In 1967, white residents of New Brighton complained that brokers invested in two-family houses, rented them to Blacks, and then approached whites on nearby blocks, offering to buy their houses "at ridiculously low prices." One New Brighton neighborhood organization complained that real estate brokers "made it very clear that we should sell our houses to them because more and more Negroes are moving in."[62] Other white homeowners reported brokers telling them that their neighborhood is "deteriorating," suggesting that it was in their financial interest to sell and move out quickly.[63]

51.   A particularly widespread and persistent discriminatory practice is "steering," that is, directing white homebuyers or renters to all-white communities and non-whites to predominantly non-white or racially transitional neighborhoods.[64] In 1967, the head of a Staten Island open housing organization described this process: "Whenever a Negro goes into a Staten Island real estate office he always gets sent back to the worst areas…The white clients get shown places in the nice neighborhoods."[65] A little more than a decade later, when complaints about steering on Staten Island were mounting, a Black family reported its experience of steering. They asked to be shown

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Anthony J. Orum (Chichester, UK: Wiley, 2019), 135-37.

[61] "Rights Agency to Probe Blockbusting on Island," *Staten Island Advance*, January 9, 1967; "New Brighton Residents Score 'Slum' Conditions," *Staten Island Advance*, January 12, 1967; DA to Check Alleged Realty Blockbusting," *Staten Island Advance*, July 31, 1969; 2 Island Realtors Named in Local Blockbusting Case," *Staten Island Advance*, December 18, 1969; "State Penalized Realty Brokers for Blockbusting," *Staten Island Advance*, December 12, 1970.

[62] "Rights Agency to Probe Blockbusting."

[63] "New Brighton Residents Score 'Slum' Conditions," *Staten Island Advance*, January 12, 1967.

[64] Diana Pearce, "Gatekeepers and Homeseekers: Institutionalized Patterns in Racial Steering," *Social Problems* 26 (1979), 325-34; John Yinger, *Housing Discrimination Study: Incidence of Discrimination and Variation in Discriminatory Behavior* (Washington, DC: US Department of Housing and Urban Development, Office of Policy Development and Research, 1991); Michael Fix and Raymond J. Struyk, eds., *Clear and Convincing Evidence: Measurement of Discrimination in America* (Washington, DC: The Urban Institute Press, 1993); George Galster and Erin Godfrey, "By Words and Deeds: Racial Steering by Real Estate Agents in the U.S. in 2000," *Journal of the American Planning Association*, 71:3 (2005), 251-268.

[65] Steven V. Roberts, "Bias Charged in Housing on S.I.," *New York Times*, January 20, 1967.

houses "south of New Dorp," in an overwhelmingly white part of Staten Island. Instead, their broker "said that there were none, but told family members that there were several possibilities in New Brighton, where more minorities reside."[66]

52.   Steering is an effective discriminatory practice because it is largely hidden from public view. The most effective way to uncover steering is the process of paired testing. Civil rights organizations and civil rights agencies hire matched pairs of prospective tenants or home purchasers of different racial or ethnic backgrounds, but with identical incomes, credit histories, and educational backgrounds. Paired testers approach rental agents or real estate brokers expressing the same preferences for neighborhoods, monthly rents, or purchase prices. In 1963, in the first record of paired testing in Staten Island, 150 Black and white couples found a "discriminatory trend of demanding a 15 percent higher down payment from Negro families over white persons seeking to purchase homes on Staten Island."[67]

53.   In the late 1980s, the Open Housing Center (OHC) conducted paired testing in Staten Island apartment complexes. In 1987, testing evidence that demonstrated racial discrimination led to a successful class action lawsuit against the Saxon Apartments on Staten Island.[68] In a similar 1988 case, the Parkview Apartment complex in Silver Lake settled a fair housing discrimination lawsuit, also involving paired testers, by agreeing to offer one-fourth of its apartments to prospective Black renters.[69] In 1993, after two Black prospective tenants at the Dartmouth Apartments, a high rise in Grasmere, complained that they were not shown apartments, OHC sent testers who verified the disparate treatment of whites and Blacks and filed a

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[66] Sydney Freedberg, "Real Estate Brokers Face Probe on Racial Steering," *Staten Island Advance*, February 16, 1978.
[67] "Claim Bias in Staten Is. Housing," *New York Amsterdam News*, May 25, 1963.
[68] *Dix-Jones v. Saxon Apts. Assocs. II,* 1987 WL 12033 (E.D.N.Y.1987) as cited in *Open Housing Center, Inc. v. Samson Management Corp*, 152 FRD 472 (S.D.N.Y. December 14, 1993). See also Karla Schuster, "Suit Guarantees Apartments for Minorities," *Staten Island Advance*, June 27, 1989.
[69] "Complex Agrees to Offer Blacks Apartments, *Staten Island Advance*, June 11, 1988.

discrimination suit.[70]

54.   Blacks seeking houses and apartments in predominantly white sections of Staten Island continued to experience discrimination.[71] In 1986, the head of the Urban League on Staten Island filed suit against a Graniteville condominium developer after her application had been rejected on the basis of her race.[72] Gloria Smith, a Black woman who looked for apartments in predominantly white sections of the island for her family, reported harrowing experiences with potential landlords. She was only shown three of twenty-seven apartments advertised. "I had doors slammed on my face," she reported. "Sometimes people would just look out the window and not open the door." Once, when she and her husband left a prospective apartment, she witnessed "a group of 20 to 30 whites [who] stood outside an apartment, arms folded and faces contorted with anger, waiting to deliver a message to the landlord….They said if she rents to us there would be an accident on the property."[73] In 1987, the NAACP Legal Defense Fund filed a federal class action suit against five prominent Staten Island real estate firms for violations of fair housing laws.[74]

D. White Hostility and Racial Harassment

55.   Real estate brokers also frequently complained about their experiences with white hostility toward the prospect of having non-white neighbors. In a 1983 public hearing, William Coull, a leading Staten Island realtor, blamed white residents for perpetuating illegal housing discrimination.[75]

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[70] "S.I. Hi Rise Has Two Doors—One Black, One White," *New York Amsterdam News*, September 18, 1993.

[71] See for example, "Staten Island is 'More Racist than Any City Down South," *Staten Island Advance*, November 28, 1983; "Human Rights Office Needed on the Island," *Staten Island Advance*, March 1, 1983; "Equal Housing, Jobs Among the Priorities of Island NAACP," *Staten Island Advance,* February 27, 1984.

[72] "Woman Alleges Bias in Condo Denial Case," *Staten Island Advance*, May 30, 1986.

[73] "Island Housing Bias: Blame Goes in Circles," *Staten Island Advance*, July 13, 1986; "An Apartment, But What a Price to Pay," *Staten Island Advance*, July 13, 1986.

[74] "Housing Discrimination Suit Nears Trial Date," *Staten Island Advance*, February 13, 1987.

[75] "Human Rights Office Needed on the Island," *Staten Island Advance*, March 1, 1983. See also, "Real Estate Agents

56.   White hostility to the prospect of Blacks and Latino neighbors has sometimes resulted in violence. In a particularly infamous incident in April 1972, four white men in New Dorp—a broker, an NYPD police sergeant, a corrections officer, and a NYCHA housing police officer—vandalized and burned down a single-family home rented by Alberto Charles, a Black Venezuelan-born psychologist, and his wife, a Princeton graduate student, and their three children.[76] In June 1976, the four white men were convicted for the attacks.[77]

57.   Discrimination against minority homebuyers and renters has continued up to the present day. The incidents are too numerous to recount. In 1991, Project Hospitality, a nonprofit that found housing for people living in overcrowded or substandard buildings, was flooded with calls and threats when they helped a Black family to move into a Huguenot apartment that the organization had purchased.[78] But it was not just working-class Blacks who attracted opposition. Later that year, a Navy Chief who was Black looked at more than 40 houses on Staten Island and, after she made an offer on a Bull's Head condominium, the landlord reported that the apartment had been ransacked and the walls covered with racial epithets. She withdrew from the deal.[79] Bull's Head was the site of another racial incident in 2000, when a Black nurse who had just moved into the community found the words "WHITE POWER" and "MOVE" spray painted on her garage door.[80] A spate of hate crimes in the Mid-Island area in late 1999 and early 2000 targeted Black and Latino residents.[81]

Pin Bias Rap on Residents," *Staten Island Advance*, September 22, 1987.

[76] Paul L. Montgomery, "Fire at Black's House Stirs Fear and Rumor on S.I. Block," *New York Times*, April 25, 1973; John Hanley, "Aftermath of SI Fire: A Plea for Brotherhood," *New York Times*, April 28, 1972; "NAACP Letter Was Key in Staten Island Indictment," *New York Amsterdam News,* October 29, 1975.

[77] Max Siegel, "4 Guilty of Harassing Black S.I. Family," *New York Times*, June 4, 1976.

[78] Laura Bruno, "New Neighbors Rile Community," *Staten Island Advance*, October 23, 1991.

[79] "Islanders Step Up to Counter Bigotry for Navy Chief," *Staten Island Advance,* December 19, 1991.

[80] Michael Scholl, "Home Defaced by Racist Scrawl," *Staten Island Advance,* April 4, 2000; "Racist Graffiti Painted At Black Woman's Home," *New York Times*, April 5, 2000; Over the previous year, Blacks were the target of eight bias crimes; Jews six. Lesbians and gays were also targets.

[81] Frank Donnelly, "Words of Hate Gone—Problem Lingers," *Staten Island Advance*, April 4, 2000.

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58.   In 2018, Staten Island Legal Services filed a fair housing lawsuit against the Urby apartment complex on the Stapleton waterfront on behalf of three low-income Black tenants who lived in Urby's units that were set aside for residents with rental subsidies. The suit alleged that after better-off tenants "living in the market-rate unit began publicly complaining on social media about the behavior of the low-income tenants, frequently using racially charged language such as 'ghetto' and 'crackheads,'" Urby was alleged to have initiated a "process of harassment against the tenants, including "baseless and frivolous housing court litigation and aggressive but paltry buy-out offers against low-income black tenants with subsidies."[82] The case was settled later that year.[83]

59.   Sometimes, single-property owners discriminated. In 2019, a woman won damages from a landlord who had advertised his apartment on Craigslist but turned her away when he learned that she was Black.[84]

60.   But large and respected real estate brokers continued to play a central role in maintaining segregated housing on the island. In 2019, the City of New York filed a fair housing suit against the owners and brokers of the Parkview Apartments, the same building that had, under different management, been charged with civil rights violations in the late 1980s).[85] In 2020, in *United States v. Village Realty of Staten Island*, the U.S. Department of Justice charged a prominent Staten Island real estate firm with racial discrimination against prospective Black renters. The DOJ sent paired testers to demonstrate the differential treatment of Black and white

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[82] "Legal Services NYC Files Federal Complaint Against Luxury Housing Complex in Staten Island Alleging Racial Discrimination," July 11, 2018, https://www.legalservicesnyc.org/news/lsnyc-files-federal-complaint-against-luxury-housing-complex-in-staten-island-alleging-racial-discrimination/.

[83] Serena Trangle, "Urby in Stapleton Settles Race Discrimination Lawsuit," AMNY, November 28, 2018, https://www.amny.com/real-estate/urby-staten-island-1-24007479/.

[84] New York Human Rights Commission, Prospective Tenant Settles Race Discrimination Claim with Staten Island Landlord Who Denied Her Housing, November/December 2019.

[85] *City of New York v. Sansom Management*, No. 451144/2019 (Sup. Ct., New York County 2019).

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renters.[86] The case was resolved with a 2021 consent decree.[87]

61.   In 2024, the Fair Justice Housing Center filed a discrimination lawsuit against a Staten Island realty firm, Exclusive Properties Realty, Inc., for alleged discrimination against Blacks who sought to rent in one of the island's luxury apartment buildings.[88]

62.   In 2025, the Fair Housing Justice Center filed a lawsuit in the Eastern District of New York on behalf of a Black couple who were rebuffed in their search for a three-bedroom apartment on Staten Island. They allege that one broker, who encouraged their application, changed his position when he met them in person. "He said he was going to be straight with us – that the owner just didn't want to rent to Black people." [89]

E. Violence and Hate Crimes

63.   As more non-whites moved into Staten Island, racial conflicts were intense, particularly around education. White Staten Islanders engaged in what scholars call "defensive localism," using legal and extralegal means to defend the racial homogeneity of their neighborhoods. Schools were one battleground. In 1980, several hundred white students at New Dorp High School engaged in a brutal attack on their Black classmates, only five percent of the student body. Black parents kept their children home for two days, until their demands for more security and an investigation into the melee were met.[90]

64.   White Staten Islanders also fought to keep Blacks out of the Staten Island Mall, in the mostly white New Springville area. In 1987, "30 whites, one armed with a length of pipe,

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[86] *U.S. v Village Realty of Staten Island Ltd. and Denis Donovan*, Complaint, September 30, 2020, E.D.N.Y, Civil No. 20-CV-4647, https://www.justice.gov/crt/case-document/file/1324221/dl.
[87] *U.S. v Village Realty of Staten Island Ltd. and Denis Donovan*, Consent Decree, April 5 2021, E.D.N.Y, Civil No. 20-CV-4647, https://www.justice.gov/crt/case-document/file/1385971/dl
[88] *Fair Justice Housing Center v. Yudi Niaznov et al.* Complaint, E.D.N.Y. 24 Civ. 4201, June 12, 2024.
[89] Fair Justice Housing Center, "Steven and Maya's Fair Housing Story," July 8, 2025, https://fairhousingjustice.org/personal-stories/he-said-he-was-going-to-be-straight-with-us/.
[90] "White Bigots N.Y. Style in Staten Island," *New York Amsterdam News*, October 18, 1980.

chased two African-Americans from the Staten Island Mall in New Springville,"[91] part of what the *New York Amsterdam News* reported as a series of attacks on Blacks and Hispanics on the island that year.[92]

65.   In what political scientists Daniel C. Kramer and Richard M. Flanagan call an "outrageous instance of racial discrimination on Staten Island," white residents opposed the extension of the S61 bus line from the North Shore to the Staten Island Mall. They report that "Willowbrook residents set up a howl of protest. The real reason was racism. As the first author was told when he was asked to sign a petition against the S61 (he firmly refused to do so), 'those people from Jersey Street (a predominantly African-American area) will take the bus, hop off in our community, and mug and rob our kids.'"[93]

66.   Even highway names proved to be controversial in the racially charged atmosphere of a diversifying Staten Island. In 1988, when the Willowbrook Parkway was renamed the Dr. Martin Luther King, Jr. Expressway, vandals shot at the new sign and splashed paint on it. In early 2000s, the *New York Times* reported: "Signs along Staten Island's highways routinely refer to major connecting roads by name. The West Shore Expressway is cited on several signs along the Staten Island Expressway. But signs for the Dr. Martin Luther King Jr. Expressway instead refer to the road by its other name, 440 North. Dr. King's name is used only on two signs on the road itself, along its median."[94]

67.   As Staten Island grew increasingly diverse in the late twentieth century, anti-Black and anti-Latino violence broke out often. In 1988, a black man was hit by a car in what police

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[91] Kramer and Flanagan. *Staten Island*, 107.
[92] David Hatchet, "New York City Becoming Hot-Bed of Racial Hatred?" *New York Amsterdam News*, September 26, 1987.
[93] Kramer and Flanagan, *Staten Island*, 108.
[94] Jim O'Grady, "Neighborhood Report: Northern Staten Island: Dr. King's Highway Should Say Dr. King, Critics Argue," *New York Times*, March 3, 2002.

called a "racial incident" on the edge of all-white Rosebank and mostly Black Park Hill. Along the rail overpass that divided the neighborhood, graffiti that read "Rosebank No. 1 K.K.K." had remained untouched for at least ten years before the incident. On another Rosebank street, locals had spraypainted KKK in four places and another sign that read "Death to All Niggers."[95] Staten Island did not have a large Ku Klux Klan (it had an active chapter through 1946[96]), but in 1992, the Ku Klux Klan—attempting a revival more than a half century after the 1920s Browne case—began recruiting among young people on Staten Island.[97] KKK-related hate crimes recurred over the next few decades. A graffiti vandal scrawled KKK on the cars of two men, one Black and one Latino, in Bull's Head in 1999.[98] Someone placed a KKK recruitment sign in Borough Hall in 2005, along with a slur targeting Mexicans.[99]

68.   In the late summer of 2003, a spate of hate crimes and racial clashes occurred, including an attack on a Black woman and five of her friends in Great Kills Park by a group of about a dozen white men, who attacked them with broken bottles and a sickle. Eleven more incidents were reported during that period, including a beating, vandalism of a car and verbal assaults.[100]

69.   Anti-Latino sentiment intensified in Staten Island, especially from 2022 to 2024, as the number of asylum seekers in the city rose. Most of them had been sent to New York City from the U.S.-Mexico border and the vast majority originated from Latin America (41 percent from Venezuela, 18 percent from Ecuador, 13 percent from Colombia, 5 percent from Peru, 2 percent

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[95] Sam Howe Verhovek, "Race and a Death Dividing Two Neighborhoods on S.I.," *New York Times*, October 17, 1988. See also "March for Decency in Staten Island Death," *New York Amsterdam News*, October 29, 1988.
[96] "Klan is Outlawed in New York State," *New York Times*, July 30, 1946.
[97] Carl Campanile, "Island Klan Activities Denounced," *Staten Island Advance*, October 26, 1992.
[98] "Racist Scrawlings Found on Bull's Head Man's Car, *Staten Island Advance*, October 6, 1999; Robert Gavin and Michael Scholl, "A Second Car Defaced with Racist Scrawl," *Staten Island Advance*, October 8, 1999.
[99] Jeff Harrell, "Cops Investigating Racist Slurs Found Inside Borough Hall, *Staten Island Advance,* March 3, 2005.
[100] Berger and Urbina, "Along with Population and Diversity, Stress Rises on Staten I;" Shin Maki, "Activists Meet To Bridge Racial Divide on S.I.," *New York Daily News*, October 12, 2003.

from Nicaragua, and 1 percent from Honduras).[101]

70.   Staten Islanders protested against proposed temporary housing for refugees on Staten Island, including the conversion of the ninety-three room Comfort Inn in Travis for asylum-seeking families with children,[102] the rumored conversion of an assisted living facility in Midland Beach for temporary housing,[103] and the possibility of the construction of a shelter in Fort Wadsworth, a relatively isolated and gated historic Coast Guard facility beneath the Verrazano Narrows Bridge on the island's eastern shore.[104] Even the rumor that migrants sent from the border states of Texas and Florida might be housed on a repurposed cruise ship off Staten Island generated outrage.[105]

71.   The largest anti-immigrant protests broke out in the primarily white Arrochar neighborhood, beginning on August 12, 2023, where about 300 people gathered to oppose a proposed shelter for refugees in an empty former school building.[106] Among the crowd were some of the Island's most prominent elected officials, including Borough President Vito Fossella, State Senator Andrew Lanza (R-Staten Island), City Council member David Carr (R-Mid-Island),

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[101] Sahalie Donaldson, "Venezuela, Ecuador, and Colombia Are Top Countries of Origin For NYC Asylum Seekers," City & State New York, August 30, 2023, https://www.cityandstateny.com/policy/2023/08/venezuela-and-colombia-are-top-countries-origin-nyc-asylum-seekers/389888/. Data from 2002 through July 2023. At least another 6 percent were Africans, from Senegal and Mauritania.

[102] Giavanni Alves, "Staten Island Pols Express Outrage Over Migrants Being Housing in a Staten Island Hotel," *SI Live*, October 5, 2022, https://www.silive.com/politics/2022/10/staten-island-pols-express-outrage-over-migrants-being-housed-in-a-staten-island-hotel.html.

[103] Paul Liotta, "Staten Island Assisted Living Facility Will Turn into NYC Migrant Shelter, Local Officials Say," *SI Live*, August 8, 2023, https://www.silive.com/news/2023/08/staten-island-assisted-living-facility-will-turn-into-nyc-migrant-shelter-local-officials-say.html.

[104] Paul Liotta, "Borough President Calls for Migrants to Be Housed in DC Instead of Fort Wadsworth, *SI Live*, August 15, 2023. https://www.silive.com/news/2023/08/borough-president-calls-for-migrants-to-be-housed-in-washington-dc-instead-of-fort-wadsworth.html.

[105] Paul Liotta, "'Masses of People in Our Staten Island Parks': Reaction Pours in Over News of Possible Migrant Ship at Homeport," *Staten Island Advance*, October 1, 2022; Paul Liotta, "Adams Remains Silent on Possible Migrant Ship at Staten Island Homeport, Staten Island Advance, October 3, 2022, https://www.silive.com/news/2022/10/adams-remains-silent-on-possible-migrant-ship-at-staten-island-homeport-emergency-centers.html.

[106] Paul Liotta, "'We Are At War!': Protestors Against Staten Island Migrant Shelter Pledge 'Disruption' Akin to COVID-19 Mayhem," *Staten Island Advance*, August 14, 2023.

State Assemblyman Michael Reilly (R-South Shore) and the future Republican mayoral candidate Curtis Sliwa.[107] They were joined by members of the Proud Boys, a white nationalist, extremist organization with a very active Staten Island chapter.[108]

72.   The immigration protests grew increasingly disruptive and sometimes violent in September 2023. On September 19, about 1,000 protestors blockaded a bus taking migrants to a shelter in a former retirement home in Midland Beach, a mostly white area.[109] The seven-hour protest, which included stone-throwing and clashes with the police, led to ten arrests.[110] For months afterward, protestors continued to gather at night in front of the shelter, which primarily housed refugee families with children, shouting through bullhorns, "blasting music, waving American flags and shining lights both through the windows and on migrant residents as they entered and exited the facility."[111]

73.   The protests and outrage over the provision of temporary housing for refugees in Staten Island was disproportionate to the number of migrants and shelters. In March 2024, only five of 161 refugee shelters in New York's five boroughs were located on Staten Island. Only 1 percent of the city's refugee population lived on Staten Island. There were no refugee shelters in

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[107] Liotta, "'We Are At War.'"
[108] Liotta, "'We Are At War.'" On the Proud Boys, see Southern Poverty Law Center (SPLC), "Proud Boys: SPLC Designated Hate Group," https://www.splcenter.org/resources/extremist-files/proud-boys/. The SPLC reports that in 2021, the Canadian government designed the Proud Boys as a terrorist entity. In their most recent listing of "General Hate" groups nationwide, the SPLC included the Staten Island chapter of the Proud Boys. Southern Poverty Law Center, "General Hate" (2024), https://www.splcenter.org/resources/extremist-files/general-hate/#2024-general-hate-groups.
[109] "NYPD: Cop Injured, 48 Year Old Man One of Ten People Arrested After Protest at New Migrant Shelter on Staten Island," *Staten Island Advance*, September 20, 2023, https://www.silive.com/crime-safety/2023/09/nypd-cop-injured-10-people-taken-in-for-questioning-after-protest-at-migrant-shelter-on-staten-island.html.
[110]   Erica Brosnan, "Protestors Arrested Outside Staten Island Migrant Shelter," NY1, September 20, 2023, https://ny1.com/nyc/all-boroughs/news/2023/09/20/protesters-arrested-outside-staten-island-migrant-shelter.
[111] Eric Bascombe, "Island Shores Migrant Shelter Plagued by Protestors Flashing Lights, Blaring Megaphones," *Staten Island Advance*, October 27, 2023, https://www.silive.com/news/2023/10/island-shores-migrant-shelter-plagued-by-protesters-flashing-lights-blaring-megaphones.html; Giullia McDonnell Nieto del Rio and Gabriella Henriquez Stoilow, "Staten Island Shelter Protest Continue Despite Migrants' Fears for Their Safety," *Documented*, April 12, 2024, https://documentedny.com/2024/04/12/staten-island-migrants-protests/.

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the southernmost and whitest section of the island.[112] Only 851 of 54,048 (1.5 percent) of students in Staten Island public schools were refugees.[113]

74. Staten Island's anti-immigrant protests alienated many Latinos living on the island and fostered a sense of fear and a deep distrust of local government. Michelle Molina, director of an immigrant aid nonprofit, told an interviewer: "Some people are starting to feel threatened…Because as we know hateful remarks and hateful approaches also end in hate crimes."[114] Sandra Ramirez, a lifelong resident of Staten Island and a second-generation Mexican-American, removed anti-immigrant signs in her neighborhood. "I do it because this affects us all. I think about my parents and how they must feel," she told a reporter. "I do not agree with these types of signs because they only foment violence."[115]

75. Yesenia Mata, a Staten Island resident and director of a center that provides support for low-wage immigrant workers, expressed her frustration at the unresponsiveness of local elected officials to their Latino constituents. "I'm shocked our very own elected officials riled [these protesters] up, and empowered them to do what they are doing now," said Mata. "If anything is to happen to the people in the shelter, these elected officials need to be held accountable. How dare you treat people in this way when your own family, your own parents or grandparents, were immigrants. It's like you forgot your story. As the daughter of immigrants, I will never forget where I come from." She continued: "Sometimes, these elected officials say, 'Oh, well, we're listening to Staten Islanders.' And I'm like, wait a minute. I'm a Staten Islander. I vote. Who are

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[112] Annie McDonough, "Where Are Asylum-Seekers Living in New York City?," *City & State New York*, March 25, 2024. https://www.cityandstateny.com/policy/2024/03/where-are-asylum-seekers-living-new-york-city/395176/.
[113] Total enrollment from New York State Education Department, NYC Geog. Dist. #31, Staten Island at a Glance, 2023-24, https://data.nysed.gov/profile.php?instid=800000042056. Refugee enrollment from New York City Comptroller, Accounting for Asylum Seeker Services: Asylum Seeker Consensus, March 11, 2024, https://comptroller.nyc.gov/services/for-the-public/accounting-for-asylum-seeker-services/asylum-seeker-census/.
[114] Garsd, "On N.Y.'s Staten Island."
[115] Fahy and Vilchis, "Suing. Heckling. Cursing."

you listening to? Because I know you're not listening to me, and there's many people on Staten Island who think the same way I do."[116]

SOCIO-ECONOMIC DISPARITIES

76.   A statistical picture of Staten Island, drawn from the U.S. Census Bureau's most recent *American Community Survey*, reveals significant differences in the educational and socio-economic status between whites, Blacks, and Latinos, which can affect the ability of different groups to participate in the political process.[117]

77.   There are significant disparities in educational attainment between white, Black, and Latino adults on Staten Island (over 25 years old) as seen in Figure 7. More than 1 in 5 Latinos and 1 out of 9 Blacks but only 1 in 14 whites are not high school graduates. At the other end of the scale, whites are far more likely than Blacks and Latinos to graduate from college. A little less than a quarter of Latinos and a little more than a quarter of Blacks, but more than one-third of whites, have obtained at least a bachelors' degree. Many of New York's best jobs are in positions that require a college degree or more, including white-collar positions in corporations, government, finance, insurance, real estate, and health care administration, which are all major sources of employment in the region. The economic returns of higher education have increased substantially in the past half century and most of the highest-paying jobs are closed to those without college degrees.

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[116] Lovallo, "They Put Family First."
[117] Raymond E. Wolfinger and Steven J. Rosenstone, *Who Votes?* (New Haven, Yale University Press, 1980), 20–21, 25; Steven J. Rosenstone and John Mark Hansen, *Mobilization, Participation, and Democracy in America* (New York, Macmillan, 1993).

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Figure 7: Highest Educational Attainment: Blacks, Latinos, and Whites, Staten Island, 2019-2023[118]

	White	Black	Latino
Less than high school diploma	7.2%	11.1%	20.5%
High school graduate	29.6%	33.7%	33.6%
Some college or associate's degree	24.3%	26.2%	22.7%
Bachelor's degree or higher	39.0%	28.8%	23.1%

78.   Blacks and Latinos on Staten Island experience significant socio-economic disparities (Figure 8). White per capita income is substantially higher than other groups. Latinos and Blacks earn only about 60 percent of white per capita income on Staten Island. That income gap is explained in part by disparities in labor force status. Whites are significantly less likely to be unemployed than Latinos and Blacks in Staten Island. Racial disparities in poverty are also stark. Only about one in fifteen whites live in poverty on Staten Island, but one in six Latinos and one in four Blacks are poor.

Figure 8: Socio-Economic Status by Race and Ethnicity, Staten Island, 2019-2023[119]

	White	Latino	Black
Per capita income	$52,572	$31,647	$30,784
Unemployment rate	5.0%	6.7%	6.8%
Below Poverty line	6.8%	16.3%	24.6%

79.   Homeownership gaps between whites, Blacks, and Latinos on Staten Island are wide (Figure 9). More than three quarters of whites are homeowners, whereas more than half of Latinos and almost two-thirds of Blacks are renters. Longstanding patterns of housing discrimination and residential segregation are at the root of housing inequities in Staten Island. Blacks and Latinos are more likely to be renters than white residents and are more likely to live in

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[118] U.S. Census, ACS, 2019-23.
[119] U.S. Census, ACS, 2019-23.

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inferior housing. And finally, homeownership is strongly correlated with political participation.[120]

Figure 9: Housing Tenure by Race and Ethnicity, Staten Island, 2019-2023[121]

	White	Latino	Black
Homeowner	76.8%	43.7%	35.8%
Renter	23.2%	56.3%	64.2%

DISPARITIES IN POLICING: HARASSMENT, BRUTALITY, STOP-AND-FRISK

80.   Police harassment, the unnecessary use of force, and brutality toward racial minorities has long been a problem on Staten Island. As non-whites began to move on to Staten Island, law enforcement officials played a crucial role in maintaining racial boundaries— sometimes individually (as in the case of the Charles family in New Dorp, discussed above), sometimes collectively. Grievances against the police were common. As early as World War II, Blacks faced disparate policing on Staten Island. In 1945, unfounded rumors circulated about crimes allegedly perpetrated by Black soldiers stationed at Fox Hills on Staten Island (where they stayed in segregated barracks). Two hundred police officers were dispatched to the area, in what the *New York Herald* called "the largest concentration of police in the history of Staten Island."[122] Historian Emily Brooks writes that "enlisted men inside the camp were denied weekend passes and had their persons searched for knives up to three times a night." When the NAACP investigated, soldiers told them that "they felt like 'prisoners of war.'"[123]

81.   Over the years, Staten Island was the site of a number of police shootings that generated intense controversy. A police officer shot to death an 11-year-old boy, Ricky Bodden,

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[120] John I. Gilderbloom and John P. Markham. "The Impact of Homeownership on Political Beliefs," *Social Forces* 73:4 (1995). 1589-1607; Warren Miller and J. Merrill Shanks. *The New American Voter* (Cambridge: Harvard University Press. 1996). 86, 88, 195, 274-75.

[121] U.S. Census, ACS. 2019-23.

[122] Emily M. Brooks. *Gotham's War Within a War: Policing and the Birth of Law-And-Order Liberalism in World War II-Era New York City* (Chapel Hill: University of North Carolina Press. 2023), 136-137.

[123] Brooks. *Gotham's War Within*. 136-143. Quotes 136.

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running from a stolen car in 1972, and injured three others, including two bystanders, and only received one-year probation and the loss of twenty vacation days for "recklessly firing his service revolver."[124]

82.   In 1984, the New York Human Rights Commission issued a report on police brutality on Staten Island, including allegations of three homicides and ten beatings. The report did not attempt to prove or disprove the allegations, but rather "to record the perceptions that may adversely affect neighborhood/community stability."[125]

83.   Distrust of the police sometimes flared up, for example, in April 1994, when Ernest Sayon, a 22-year-old Black man, died during a struggle with the police in Park Hill after a firework went off.[126] A subsequent medical examiners' report found that Sayon died from "asphyxia by compression of the chest and neck while rear-handcuffed and prone on the ground," finding that his death was homicide.[127] A grand jury, however, exonerated the arresting officers, and no charges were filed.

84.   There is substantial evidence of persistent disparate treatment of Staten Islanders by police in more recent years, especially in NYPD's use of "stop and frisk" tactics. In 1998, the U.S. Civil Rights Commission examined NYPD's stop and frisk reports (form UF-250) and found that Blacks and Latinos were disproportionately targeted on Staten Island. The Commission reported: "Approximately 51.6 percent of Staten Island UF-250 subjects were identified as Black, 32.4 percent were classified as white, and 15.5 percent were described as Hispanic. The population

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[124] Marilynn S. Johnson, *Street Justice: A History of Police Violence in New York City* (Boston: Beacon Press, 2004), 277; see also M. Cordell Thompson and Carolyn Erwin, "Death is Price Paid by Youth Crime Suspects," *Jet*, September 14, 1972; U.S. House of Representatives, Judiciary Committee, 98th Congress, First Session on Police Misconduct, Part II, Serial No. 50, June 16, July 18, September 19, and November 28, 1983 (Washington, DC: U.S. Government Printing Office, 1984), 1002.

[125] Denise Rinaldo, "Account on 'Brutality' by Island Cops Released," *Staten Island Advance*, November 15, 1984.

[126] Craig Schneider and Angela Mosconi, "Death…Then Outrage," *Staten Island Advance*, April 30, 1994.

[127] Craig Schneider and Anne Marie Calzolari, "The Findings: Medical Examiner Labels Sayon's Death a Homicide," *Staten Island Advance*, May 10, 1994.

of Staten Island is approximately 75.4 percent white, 9 percent Black, 8.6 percent Hispanic, and 6.7 percent Asian."[128]

85.   In 2007, the NYPD released another report on stop and frisk practices throughout the city, conducted by the RAND Corporation, a major policy research center. The report found that "the Staten Island borough stands out particularly with several large racial gaps in the frisk rates (20 percent of whites versus 29 percent of similarly situated blacks), search rates (5 percent for whites versus 8 percent of similarly situated blacks), and use-of-force rates (10 percent for whites and 14 percent for similarly situated blacks)."[129] RAND "recommended a closer look at the unexplainable racial disparities on Staten Island and a regular examination of those officers with stop patterns that differed markedly from their colleagues."[130]

86.   In 2012, a white Staten Island police officer who lived in Tottenville pleaded guilty in federal court to charges of falsely arresting a black Stapleton man. In the aftermath of the arrest, he told a friend about how he had "fried another nigger." The officer had been previously accused of mistreatment of Blacks, and the trial judge noted that he had told a suspect "to shut your nigger mouth." In his leniency plea, the officer wrote to the judge that he "did not use that word out of a racist motivation, but, instead, as part of the culture that I was accustomed to."[131]

87.   In 2014, Staten Island was the site of an internationally infamous case, when two

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[128] U.S. Civil Rights Commission, *Police Practices and Civil Rights in New York City* (Washington, DC: U.S. Government Printing Office, 2000), 96, 98, figure 5.7.

[129] Greg Ridgeway, *Analysis of Racial Disparities in the New York Police Department's Stop, Question, and Frisk Practices* (Santa Monica, CA: RAND Corporation, 2007). https://www.nyc.gov/assets/nypd/downloads/pdf/public_information/TR534_FINALCompiled.pdf.

[130] Summary of the RAND Report on NYPD's Stop, Question, and Frisk, Testimony Presented Before the New York City Council Committee on Public Safety and Committee on Civil Rights by Greg Ridgeway, April 30, 2009. https://www.rand.org/content/dam/rand/pubs/testimonies/2009/RAND_CT329.pdf.

[131] United States Attorney's Office, Eastern District of New York, Press Release, June 22, 2012; https://www.justice.gov/archive/usao/nye/pr/2012/2012jun22.html; "Judge Heaps Punishment on Ex-Cop for False Arrest," *Staten Island Advance*, January 23, 2012; Ex-NYPD Cop Sentenced to 4+ Years for Racist Bust," *New York Post*, June 13, 2012; "Victim Sues Cop Who Admits He Arrested Him for No Reason," *Staten Island Advance*, May 15, 2012; Sjursen, "Patterns in Staten Island's Racial Geography."

New York City Police officers arrested Eric Garner for selling untaxed cigarettes in Tompkinsville. Officer Daniel Pantaleo held Garner in a forbidden chokehold,[132] while Garner stated "I can't breathe" eleven times before his death. The initial internal police report did not mention the use of the chokehold, which became public only because of a bystander's phone video.[133] A Staten Island grand jury did not indict Pantaleo. In 2019, the Department of Justice dropped charges against him. Later that year, a New York judge ordered the NYPD to dismiss Pantaleo.[134] The Southern Poverty Law Center reflected on the collateral damage of the decision not to bring charges in the Garner case, stating it "exacerbates mistrust in justice system."[135]

DISPARITIES IN VOTING RIGHTS AND POLITICAL PARTICIPATION

88. Discriminatory voting practices in New York long prevented or hindered minority groups in Staten Island from participating in the political process. Beginning in 1922, during a period of intense xenophobia, New York administered stringent literacy tests, administered by the New York State Board of Regents, to disenfranchise voters who did not speak English as their first language. Literacy tests targeted immigrants, but also disenfranchised U.S. born, non-native English speakers.[136] In 1959, the U.S. Civil Rights Commission found that "Puerto Rican citizens are being denied the right to vote, and that those denials exist in substantial numbers in the state of New York."[137] A federal voting rights case in the Eastern District of New York also found that

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[132] Ian Fisher, "Kelly Bans Choke Holds By Officers," *New York Times*, November 24, 1993.

[133] For the video, see "Eric Garner: The Haunting Last Words of a Dying Man," CNN, December 4, 2014. https://www.cnn.com/2014/12/04/us/garner-last-words/index.html.

[134] Garner's arrest and death generated so much local and international press coverage that it is impossible to cite all of the sources here. A comprehensive overview can be found in Al Baker, J. David Goodman, and Benjamin Mueller, "Beyond the Chokehold: The Path to Eric Garner's Death," *New York Times*, June 6, 2014.

[135] Richard Cohen, "Decision in New York Exacerbates Distrust in Criminal Justice System," Southern Poverty Law Center, December 3, 2014: https://www.splcenter.org/resources/stories/decision-new-york-city-exacerbates-mistrust-justice-system/.

[136] Alexander Keyssar, *The Right to Vote: The Contested History of Democracy in the United States*, Revised Edition (New York: Basic Books, 2009), 117-18.

[137] U.S. Civil Rights Commission, *Report of the U.S. Civil Rights Commission, 1959* (Washington, DC: U.S. Government Printing Office, 1959), 68.

some Black voters were disqualified because of literacy tests through the 1960s.[138]

89.   White New Yorkers fiercely opposed the abolition of literacy tests that would extend the vote to non-English speakers, especially Puerto Ricans. A group of New York voters challenged the constitutionality of Section 4(e) of the 1965 Voting Rights Act, which specified that: "No person who demonstrates that he has successfully completed the sixth primary grade in a public school in, or a private school accredited by, any State or territory, the District of Columbia, or the Commonwealth of Puerto Rico in which the predominant classroom language was other than English, shall be denied the right to vote in any Federal, State, or local election because of his inability to read, write, understand, or interpret any matter in the English language." In 1966, in *Katzenbach v. Morgan*, the U.S. Supreme Court upheld the constitutionality of Section 4(e).[139] In 1970, all non-English speaking U.S. citizens gained the right to vote when Congress temporarily suspended all literacy tests for voting.[140] In 1975, an amendment to the Voting Rights Act permanently banned literacy tests.[141]

90.   Because non-white voters faced obstacles to political participation, they have long been under-represented in political offices in Staten Island. The fact that the Staten Island borough president hired a Black staffer in 1962 (the first Black person to hold such a position) was newsworthy enough to make the *New York Times*.[142] But despite this breakthrough, Blacks and Latinos continued to have little voice in Staten Island politics in the late twentieth-century and the early twenty-first. As late as 1988, there still was no African-American member of the Island's community school board even though close to twenty percent of its public school pupils were

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[138] *Goosby v. Town Board. of the Town of Hempstead, NY*, 956 F. Supp. 326 (E.D.N.Y. 1997), 352.
[139] *Katzenbach v. Morgan*, 384 U.S. 641 (1966).
[140] U.S. Civil Rights Commission, *The Voting Rights Act, Ten Years After* (Washington, DC: U.S. Government Printing Office, 1975), 4-25.
[141] Keyssar, *Right to Vote*, 222-23.
[142] "Negro Woman Gets Staten Island Post," *New York Times*, January 1, 1962

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members of minority groups.[143] It was not until 2009 that the first Black person was elected to public office from Staten Island. Debi Rose, a Democrat, was elected to the North Shore city council seat in the fall of 2009 and took office in January 2010.[144] One year later, in 2010, Nicole Malliotakis, whose father is Greek-American and whose mother is Cuban-American, and who identifies as Greek Orthodox, was elected to the State Assembly as a Republican, the first person with some Latin American heritage to become officeholder from the island.[145].

RACIAL APPEALS ON STATEN ISLAND

91.   There is a long history of racial appeals in Staten Island politics. A large body of historical and social scientific scholarship has documented the persistence of racial appeals, both explicit and coded.[146] In a comprehensive literature review, Princeton political scientist LaFleur Stephens-Dougan defines racial appeals as "[n]egative stereotypical imagery that might activate voters' negative racial attitudes includ[ing] depictions of African Americans as criminals or welfare recipients. Racially coded language includes terms that invoke racial themes without ever explicitly mentioning race, including 'law and order,' 'tough on crime,' and 'inner city.'"[147] She also reports that depictions of Latinos with dark skin and as gang members inflames racial resentment.[148] All of these forms of racial appeals can be seen in political controversies and

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[143] Kramer and Flanagan, *Staten Island*, 5-6.

[144] A.G. Sulzberger, "Staten Island Elects its First Black Council Member," *New York Times*, November 9, 2009.

[145] Judy L. Randall, "Political Trailblazer from Rosebank Posed to Light a Fire Under Albany," *Staten Island Advance*, November 11, 2010. In 2020, a Marist poll showed that 50 percent of Latinos registered voters had an unfavorable view versus 35 percent of Latino registered voters who had a favorable view of Malliotakis. 15 percent replied "unsure—never heard." Marist Polls, New York CD-11 Race, October 2020, https://maristpoll.marist.edu/wp-content/uploads/2020/10/NBC-4-NY_Marist-Poll_CD11-Registered-Voters_NOS-and-Tables_202010230908.pdf.

[146] La Fleur Stephens-Dougan, *Race to the Bottom: How Racial Appeals Work in American Politics* (Chicago: University of Chicago Press, 2020); Nicholas A Valentino, Vincent L Hutchings, and Ismail K White, "Cues That Matter: How Political Ads Prime Racial Attitudes During Campaigns," *American Political Science Review* 96 (2002), 75-90; Tali Mandelberg, *The Race Card: Campaign Strategy, Implicit Messages, and the Norm of Equality* (Princeton: Princeton: Princeton University Press, 2001).

[147] La Fleur Stephens-Dougan, "The Persistence of Racial Cues and Appeals in American Elections," *Annual Review of Political Science* 24 (2021), 303-304.

[148] Stephens-Dougan, "Persistence of Racial Cues," 311.

elections on Staten Island.

92.   In 1967, when New York City announced plans to provide temporary housing in Staten Island for primarily non-white residents from other boroughs, the controversy generated an outcry, associating city residents who had been dislocated from their homes as undesirable outsiders. The *Staten Island Advance* published a cartoon, entitled "Unwelcome Import," showing Mayor John Lindsay bringing a package called "ghetto areas" to Staten Island (Figure 10).

Figure 10: Cartoon depicting Staten Island opposition to "ghetto areas"[149]

93.   Those sentiments were deeply held on Staten Island and were reflected in demands for Staten Island's secession from New York City in the early 1990s. Staten Island's secession activists expressed many grievances, including longstanding opposition to the city's massive Fresh Kills garbage dump on the island and resentments that "the city" dismissed the needs and grievances of the Island.[150] Many secessionists also held racial resentments, including "a

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[149] "Unwelcome Import," *Staten Island Advance*, August 1, 1967.
[150] Richard Briffault, "Voting Rights, Home Rule, and Metropolitan Governance: The Secession of Staten Island As

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complicated mix of race and ideology that is difficult to entangle."[151] Some Staten Island residents

continued to see the borough as "a bastion for the descendants of white Europeans."[152]

94.   In October 1993, the *Staten Island Advance* prepared and distributed a "Secession

Curriculum" to 80 elementary, middle and high schools on the island.[153] The curriculum instructed

school children that "Staten Islanders see the city dumping its social problems here [and] many

see secession as the shut-off valve." The lesson plan elaborated: "After all, one of every four

tenants in Island public housing comes from another part of the city."[154] Black leaders, including

New York's Mayor David Dinkins, charged that the curriculum was racially biased.[155] The New

York City schools Chancellor ordered it withdrawn from the classroom.[156]

95.   Anti-secession Staten Islanders, among them North Shore neighborhood leader

David Goldfarb, noted the racial assumptions of many secessionists: "'We want to keep the

garbage out of Staten Island and we're not referring to the dump.' They were talking about welfare,

and welfare and race were often lumped together on Staten Island."[157] Commentators, even on the

conservative side of the debate, including the Manhattan Institute's *City Journal* noted "the ever-

present racial dimension" of secession, and asked: "Is secession a manifestation of white flight

taken to the extreme?"[158]

96.   Critics of secession, especially Blacks, highlighted what they feared would be the

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a Case Study in the Dilemmas of Local Self-Determination," 92 Columbia Law Review 775 (1992); Kramer and Flanagan, *Staten Island*, 127–28; Melosi, *Fresh Kills*, 380–84.

[151] Kramer and Flanagan, *Staten Island*, 119–121, quote, 128; Melosi, *Fresh Kills*, 380-383.

[152] Some journalists and secession opponents suggested that white Staten Islanders were also motivated by racial opposition to David Dinkins, New York's first Black mayor, but the preponderance of evidence suggests that such claims were exaggerated. See Melosi, *Fresh Kills*, 282, and Kramer and Flanagan, *Staten Island*, 127.

[153] "There's Still Time to Learn," *Staten Island Advance,* October 3, 1993.

[154] See Patrick Nugent, "The Urban Environmental Order: Planning and Politics on Staten Island, 1945-1984" (Ph.D. diss. George Washington University, 2016), 243-45.

[155] Nugent, "The Urban Environmental Order," 247–48.

[156] *Ibid*.

[157] Melosi, *Fresh Kills*, 381.

[158] Joseph Viteritti, "Should Staten Island Leave the City?" *City Journal* (Autumn 1992), https://www.city-journal.org/article/should-staten-island-leave-the-city

negative consequences of secession on racial segregation, the responsiveness of white Staten Islanders to minority interests, and race relations generally. Dr. Robert C. Smith, who chaired the NAACP committee examining secession, argued that Black Staten Islanders' interests were best protected if the borough remained part of majority non-white New York City. "New York City helps to restrain some of the intolerance and parochial views of some people on this island," stated Smith. "Staten Islanders don't want to deal with poor people…They don't want to deal with homeless people. I would think that they would make it very difficult for people who are homeless, poor or on welfare."[159] Evelyn King, a longtime NAACP leader, stated that secession "would be a dangerous step and detrimental to minorities." She noted that "[i]t's bad enough as it is (for blacks) in areas such as housing and employment, but I fear that we wouldn't have a chance if we secede."[160] Other Black Staten Island residents opposed secession because they feared it would lead to their further marginalization. Many referred to the concentration of non-whites and white Staten Islanders' indifference to the North Shore because it was a "ghetto."[161] In the November 1993 election, 65 percent of Staten Island voters supported a referendum to secede from New York City.[162]

97.   Columbia law professor Richard Briffault highlighted the racial implications of Staten Island's secession movement, arguing that "at a time of highly charged racial tensions, secession would constitute a mass exodus of a predominantly white, middle class community from

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[159] Julia G. Clarke, "Where Will We Turn?: Staten Island's African-American Leaders and Anti-Poverty Advocates Fear the Consequences of Secession," *City Limits* (February 1994), 22-26, quote 22. https://citylimits.org/wp-content/uploads/2024/03/74787692-City-Limits-Magazine-February-1994-Issue.pdf

[160] Mary Engels, "Freedom Bus to Roll into S.I.," *New York Daily News*, October 29, 1993.

[161] Stevie Lacie-Pendleton,"African Americans: Many Feel They Would Be Shunned," *Staten Island Advance*, March 17, 1993; Laura Bruno, "Secession: Around the Table: Single Mother Worries about Jobs, Costs, Racism," *Staten Island Advance*, March 17, 1993.

[162] *Staten Island Advance*, November 30, 1993, reprinted in "65 Percent of Staten Islanders Voted to Secede From New York City in 1993," *SI Live*, August 5, 2023. https://www.silive.com/news/2023/08/65-of-staten-islanders-voted-to-secede-from-new-york-city-in-1993-from-the-vault.html

a jurisdiction marked by extremes of rich and poor and an emerging majority of people of color."
He noted that "this would be white flight on a grand scale."[163] Ultimately, however, the secession
referendum did not win the approval of New York City's mayor and city council and the New
York State legislature.[164]

98.   Racial appeals have been used in recent elections. In 2016, Staten Island political
operative Richard Luthmann created a Facebook account that appeared to be associated with
Republican Assembly candidate Janine Materna. The account associated Materna with positions
that were "out of step" with her "conservative Staten Island district." One post read falsely
resuscitated decades-old fears that New York City was exporting its problems to the island:
"Mayor Bill de Blasio is right: we need a homeless shelter in Annadale." The Annadale area, in
the southern part of Staten Island, remains overwhelmingly white. Another post that read "Black
Lives Matter" showed Materna with former attorney general Eric Holder, who served in the Obama
administration."[165]

99.   Staten Island's first Black City Council member, Debi Rose, was subject to racial
appeals in her 2017 reelection campaign that raised many of the same issues. Luthmann allegedly
created a fake Facebook page in Rose's name (Figure 11), promoting her supposed support for a
"welfare hotel full of criminals and addicts" and turning a property into "a heroin/methadone den,"
a classic example of a racial appeal in an election.[166] Like many racial appeals, Luthmann's posts
tapped racialized fears of welfare receipt and criminality.

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[163] Richard Briffault, "Voting Rights, Home Rule, and Metropolitan Governance: The Secession of Staten Island As a Case Study in the Dilemmas of Local Self-Determination," 92 COLUM. L. REV. 775 (1992) at 844 (citations omitted).
[164] Kramer and Flanagan, *Staten Island*, 131-132.
[165] Amanda Farinacci, "'Smear Tactics': How a Lawyer Roiled City Politics Using Misleading Facebook Pages," NY1, August 25, 2017; https://ny1.com/nyc/all-boroughs/news/2017/08/24/anatomy-of-a-social-media--smear-tactic---how-a-staten-island-lawyer-ran-misleading-facebook-pages-and-roiled-city-politics.
[166] Jim Dwyer, "Lawyer Accused of Using Fake Facebook Pages to Sway Elections in Staten Island," *New York Times*, August 31, 2017/.

Figure 11: Fake Facebook Post Attributed to Debi Rose, 2017[167]
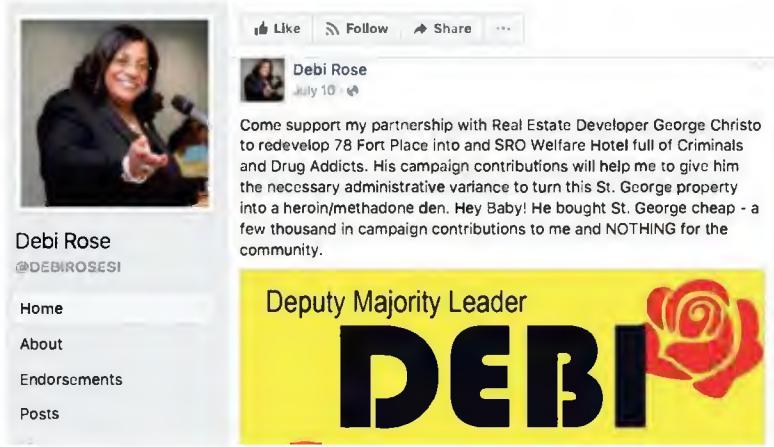
100.   The use of racial appeals negatively impacts the political climate, reinforces racial tensions, justifies segregation and exclusion, hinders the creation of communities of interest across community boundaries, and legitimates racist sentiments.

101.   Sometimes racial appeals lead to extreme expressions of prejudice or racial hatred during elections. In early 2009, the U.S. Department of Justice indicted three white men in Staten Island for brutal attacks against Blacks and one Latino man in Park Hill and Richmond on the night that Barack Obama was elected president. They beat one Black man with "a metal pipe and collapsible police baton," assaulted a Black man and a Latino man, yelled profanities about Obama as they drove past an election night gathering of African-Americans at a hair salon, and ended their rampage by hitting a Black man with their car, leaving him severely injured and in a coma after the attack.[168] The four men received a combined 293 months in prison for the assaults.[169]

102.   Also in early 2009, Salvatore Ballarino, a 16-year member of the Staten Island

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[167] Reprinted in Dwyer, "Lawyer Accused of Using Fake Facebook Pages."

[168] U.S. Department of Justice, Press Release: Three Staten Island, NY Men Indicted on Federal Hate Crime Conspiracy Charges, January 7, 2009, https://www.justice.gov/archive/opa/pr/2009/January/09-crt-011.html.

[169] U.S. Department of Justice, Press Release: Four Men Sentenced to a Combined 293 Months in Prison for Election Night Assaults," September 10, 2009, https://www.justice.gov/archives/opa/pr/four-men-sentenced-combined-293-months-prison-election-night-assaults.

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Community Education Council (which had no Black members), resigned after sending several racist jokes in a mass email. One referred to lynchings: "I have black people in my family tree. If I recall, they're still hanging there." Another played on racial stereotypes about Black indolence: "What's the difference between a black man and a picnic table? A picnic table can support a family."[170] The jokes were followed by a photograph of President Barack Obama "positioned in such a way to make him look stunned and dumbstruck."[171] The *Staten Island Advance* reported that "[t]he email has brought to the fore long-held feelings among African Americans and other minority groups that decision-makers in Staten Island's District 31 are not sufficiently attuned to their communities."[172]

103.   In 2020, the U.S. Department of Justice brought charges against another Staten Island man, Brian Maiorana, who called himself "Proud Patriot Sailor" online, and had posted "All Lives Matter" on his Facebook profile, stockpiled weapons, spouted racist and antisemitic slogans, advocated the assassination of Biden supporters, and called for the murder of protestors.[173] "Its come to the point where pipe bombs need to be thrown into these mobs of potentially non violent violent protesters," he wrote in October 2020.[174] Maiorana pled guilty and was sentenced to three years in prison.[175]

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[170] Jen Chung, "Staten Island Education Council Member Resigns Over Racist E-Mail, *Gothamist*, March 3, 2009, https://gothamist.com/news/si-education-council-member-resigns-over-racist-e-mail

[171] Deborah Young, "Staten Island Education Appointee Email Ignites Firestorm," *Staten Island Advance*, March 2, 2009.

[172] Young, "Staten Island Education Appointee Email Ignites Firestorm."

[173] Jake Offenhartz, "Feds: Heavily Armed Staten Island Extremist Threatened to Kill Biden After Trump's Loss," *Gothamist*, November 11, 2020, https://gothamist.com/news/feds-heavily-armed-staten-island-extremist-threatened-kill-biden-supporters-after-trumps-loss.

[174] U.S. Attorney's Office, Eastern District of New York, Press Release: "Staten Island Man Arrested In Connection With Threats To Kill Protesters, Politicians and Members of Law Enforcement," November 10, 2020, https://www.justice.gov/usao-edny/pr/staten-island-man-arrested-connection-threats-kill-protesters-politicians-and-members. Misspellings in quotes from from Maiorana's posts.

[175] U.S. Attorney's Office, Eastern District of New York, Press Release: "Staten Island Felon Sentenced to Prison for Possessing Illegal Firearm," May 18, 2022, https://www.justice.gov/usao-edny/pr/staten-island-felon-sentenced-prison-possessing-illegal-firearm.

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104.   In March 2021, Staten Island resident Ralph Tedesco was arrested and charged with fourth-degree criminal mischief as a hate crime. Tedesco was charged with defacing the campaign posters of Kelvin Richards, a Black council candidate, with the phrase "Fuck you Nigger!" He also scrawled the "N word" on two different occasions on campaign posters promoting the council candidacy of Ranti Ogunleye. In February 2021, he also vandalized an MTA bus with graffiti that read: "BLACK SLAVES MATTER. THEY WILL NEVER BE EQUAL. KILL THE N------."[176] Tedesco pleaded guilty to the charges in December 2021.[177]

Dated: November 17, 2025

Thomas J. Sugrue

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[176] Joseph Ostapiuk, "Man Charged with Hate Crime After Allegedly Defacing North Shore Candidate Posters," *SI Live*, March 24, 2021, https://www.silive.com/crime-safety/2021/03/man-charged-with-hate-crime-after-allegedly-defacing-north-shore-candidate-posters.html.

[177] Frank Donnelly, "He Admits Hate Crime for Racist Graffiti on SI Campaign Posters," *SI Live*, December 1, 2021, https://www.silive.com/crime-safety/2021/12/he-admits-hate-crime-for-racist-graffiti-on-si-campaign-posters-must-undergo-racial-insensitivity-treatment.html.

Appendix 1

THOMAS J. SUGRUE
New York University, 20 Cooper Square, Room 438
New York, NY 10003

EDUCATION

Ph.D.   (1992)   Harvard University (American History)

A.M. (1987)   Harvard University (American History)

M.A.   (1990)   Cambridge University (British History)

B.A. (1986)   Cambridge University (British History, *Honours*, Doncaster History Prize)

B.A. (1984)   Columbia University (History, *Summa Cum Laude,* Phi Beta Kappa)

HONORARY DEGREES

D.H.L.   (2016)   Wayne State University (Doctorate in Humane Letters, *Honoris Causa*)

M.A. (1997)   University of Pennsylvania (Master of Arts, *Honoris Causa*)

POSITIONS HELD

New York University (2015-)

    Julius Silver, Roslyn S. Silver, and Enid Silver Winslow Professor (2021-)

    Professor of Social and Cultural Analysis and History (2015-); Affiliated Professor, Wagner Graduate School of Public Service; Affiliated Professor, Sociology

    Senior Fellow, NYU Institute for Public Knowledge (2019-)

    Founding Director of Program in Urban Studies (2024-)

    Director of the Metropolitan Studies Program (2019-24)

    Director of the American Studies Program (2016-18)

    Director of the NYU Cities Collaborative (2015-)

University of Pennsylvania (1991-2015)

    David Boies Professor of History and Professor of Sociology (2009-15)

    Director of the Penn Social Science and Policy Forum (2011-15)

    Edmund J. and Louise W. Kahn Term Professor of History and Sociology (2004-09)

    Chair of the History Graduate Group (2000-02, 2003-05)

    Bicentennial Class of 1940 Term Professor of History and Sociology (1999-2004)

    Lecturer in History (1991-92), Assistant Professor of History (1992-97), and Associate Professor of History and Sociology (1997-99)

Visiting Positions

Ecole des Hautes Etudes en Sciences Sociales, Paris, Visiting Professor (May 2017).

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Princeton University, Lawrence Stone Professor (April 2009).

Harvard University, Visiting Professor of Urban Planning and Design (Fall 2008).

Nanzan University, Japan, Visiting Professor of American Studies (July-August 2007).

Institute for Advanced Study, Princeton, AMIAS Member (2005-06).

Ecole des Hautes Etudes en Sciences Sociales, Paris, Visiting Professor (Spring 2002).

New York University, Visiting Associate Professor of History (Spring 1998).

University of Michigan, King/Chavez/Parks Visiting Professor in Sociology (February 1998).

Brookings Institution, Research Fellow in Governmental Studies (1990-91).

FELLOWSHIPS, AWARDS, GRANTS, AND HONORS

Distinguished Service Award, Urban History Association, 2023.

National Magazine Award Finalist, 2021, for Best Special Issue for "Pre-Existing Conditions: What 2020 Reveals About Our Urban Future," *Public Books* (2021).

Library of Congress Lavine/Ken Burns Film Prize, 2021, for "Gradually, Then Suddenly: The Bankruptcy of Detroit," as part of team as Chief Historical Advisor and Associate Producer (2021).

Galsworthy Fellow in Criminal Justice Reform, Center for the Study of Human Flourishing, King's College (2018-19).

Fellow, Royal Historical Society, United Kingdom (elected 2017).

Walter Lippmann Fellow, American Academy of Political and Social Science (elected 2016).

Honorary Doctor of Humane Letters, Wayne State University (2016).

Fellow, New York Institute for the Humanities (elected 2016).

Andrew Carnegie Fellow, Carnegie Corporation of New York (2015-17).

President, Social Science History Association (2013-14).

President, Urban History Association (2013-14).

Richard S. Dunn Teaching Award, University of Pennsylvania (2012).

Fellow of the American Academy of Arts and Sciences (elected 2011).

Finalist, Benjamin Hooks Book Award (2011).

Fellow of the Society of American Historians (elected 2009).

Finalist, Los Angeles Times Book Prize in History (2009).

Faculty Fellow, Penn Institute for Urban Research (2009-15).

Organization of American Historians/Japanese Association for American Studies Japan Residency (2007).

History News Network, Top Young Historian (2006).

Institute for Advanced Study, Princeton, School of Social Science, AMIAS Member (2005-06).

John Simon Guggenheim Memorial Fellowship (2005).

Alphonse Fletcher, Sr. Fellowship, Fletcher Foundation (2005).

American Philosophical Society, Franklin Research Grant (2005).

Thomas J. Sugrue   **Page 3**

Edmund J. and Louise W. Kahn Endowed Term Professorship (2004-10).

Distinguished Lecturer, Organization of American Historians (2002-).

Bicentennial Class of 1940 Term Chaired Professorship, University of Pennsylvania (1999-2004).

Kellogg Foundation Non-Profits, Universities, Communities and Schools Grant (1998-2001).

SAS Faculty Research Fellowship, University of Pennsylvania (1998-99).

Richard S. Dunn Teaching Award, University of Pennsylvania (1998).

Bancroft Prize in American History (1998).

Philip Taft Prize for Best Book in Labor History (1997).

Urban History Association Jackson Prize for Best Book in North American Urban History (1997).

Sidney Hillman Foundation Award (1997). Co-Winner with members of the Steering Committee for a National Teach-In with the Labor Movement.

President's Book Award, Social Science History Association (1996).

Best Article Prize, Urban History Association (1996).

Columbia University Seminars, Publication Grant (1996).

Outstanding Professor Award, University of Pennsylvania Greek Council (1996).

American Council of Learned Societies Fellowship (1995-96).

National Endowment for the Humanities, Grant for Conference: W.E.B. Du Bois's *The Philadelphia Negro: A Centenary Reappraisal* (1994-96), Co-Principal Investigator.

University of Pennsylvania Research Foundation Grants (1994-95, 1995-96).

University of Pennsylvania, Center for Community Partnerships, Research Grant (1995).

Ford Foundation, Undergraduate Social Science Initiatives Grants (1994-1996).

Brookings Institution, Research Fellowship in Governmental Studies (1990-91).

Social Science Research Council (SSRC), Committee for Research on the Urban Underclass, Dissertation Fellowship (1991) and Research Grant (1990-91).

Bordin-Gillette Research Travel Fellowship, Bentley Library, University of Michigan (1990).

Kaiser Family Foundation Fellowship, Walter P. Reuther Library (1990).

Josephine De Kármán Foundation Fellowship (1989-90).

Kellett Fellowship, King's College, Cambridge and Columbia University (1984-86).

Harry S Truman Scholarship (1982-84, 1986-88).

BOOKS

Segregating Cities: An Arnold R. Hirsch Reader, edited (University of Chicago Press, 2026, in press).

The Long Year: A 2020 Reader, co-edited with Caitlin Zaloom (Columbia University Press, 2022).

Neoliberal Cities: The Remaking of Postwar Urban America, co-edited with Andrew J. Diamond (NYU Press, 2020).

Immigration and Metropolitan Revitalization in the United States, co-edited with Domenic Vitiello (University of Pennsylvania Press, 2017).

Thomas J. Sugrue   **Page 4**

These United States: A Nation in the Making, 1890 to the Present, with Glenda Gilmore (W.W. Norton, 2015).

♦ Revised textbook edition with new material (2016).

♦ Abridged and revised textbook edition with new material published as *These United States: A Nation in the Making, 1945 to the Present* (2016).

♦ History Book Club and Military History Book Club Selections (2015).

Not Even Past: Barack Obama and the Burden of Race (Princeton University Press, 2010).

♦ Chinese edition: 甚至还未过去 奥巴马与美国的种族负担 (Guangxi Normal University Press, 2022).

♦ French edition: *Le poids de passé: Barack Obama et la question raciale*. With an introduction by Denis Lacorne and a new chapter. (Éditions Fahrenheit, 2012).

♦ Finalist, Benjamin Hooks Book Prize, 2011.

Sweet Land of Liberty: The Forgotten Struggle for Civil Rights in the North (Random House, 2008). Paperback Edition (2009).

♦ Finalist, *Los Angeles Times* Book Prize in History, 2009.

♦ Main Selection, History Book Club, 2008.

♦ Symposia on *Sweet Land of Liberty* at the Social Science History Association Conference (2008), The Newberry Library, Chicago (2008), Université Denis Diderot, Paris-7 (2009), and American Society for Legal History Conference (2009).

♦ Roundtable on *Sweet Land of Liberty* in *Labor: Studies in Working-Class History of the Americas* 7:1 (2010)

The New Suburban History, co-edited with Kevin Kruse (University of Chicago Press, 2006).

W.E.B. DuBois, Race, and the City: The Philadelphia Negro *and Its Legacy*, co-edited with Michael B. Katz (University of Pennsylvania Press, 1998).

The Origins of the Urban Crisis: Race and Inequality in Postwar Detroit (Princeton University Press, 1996). Paperback edition, 1998.

♦ Princeton Classics Edition with a new preface, 2005.

♦ Princeton Classics Paperback with a new preface, 2014.

♦ Chinese edition with a new preface: forthcoming 2025.

♦ Japanese edition with a new preface: アメリカの都市危機と「アンダークラス」：自動車都市デトロイトの戦後史 /*Amerika no toshi kiki to andākurasu: jidōsha toshi detoroito no sengoshi*. Translated by Masaki Kawashima (Akashi Shoten, 2002).

♦ One of 100 most influential books published in the last century featured in *A Century of Books: Princeton University Press, 1905-2005* (Princeton University Press, 2005).

♦ 1998 Bancroft Prize in History

♦ 1997 Philip Taft Prize in Labor History

♦ 1997 Kenneth T. Jackson Prize for Best Book in North American Urban History, Urban History Association

♦ 1997 *Choice* Outstanding Academic Book

♦ 1996 President's Book Award, Social Science History Association

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♦ *Lingua Franca* Breakthrough Book on Race

♦ *American Prospect On-Line* Top Shelf Book on Race and Inequality

♦ Subject of roundtable in *Labor History* 39 (February 1998), 43-69.

WORKS-IN-PROGRESS

Rent: An American History (book in progress).

"Immigration's Suburban Future," *Handbook of North American Urban Futures*, ed. Diane Davis, Julie-Anne Boudreau, and Roger Keil (De Gruyter, expected publication 2026)

"The Origins of the Suburban Crisis: From Zoning to Predatory Lending," *Social Science History,* draft.

"Planning for Justice: Integrationist Planning, Community Control, and the Struggle for Metropolitan America, 1954-1980," *Journal of Urban History,* in progress.

EDITED JOURNAL ISSUES

"Crisis Cities," *Public Books*, November 2020. Nineteen article series, with Sugrue introduction.

♦ 2021 National Magazine Award Finalist (Best Special Issue).

"Nagyvárosi szegénység - Amerikában" [Metropolitan Poverty in America], *Budapesti Negyed* [*Budapest Quarterly Review*] 27-28 (1999-2000), co-edited with Michael B. Katz.

"The Politics of Culture in Cold War America," *Prospects: An Annual of American Culture Studies* 20 (1995), 449-541. Seven article symposium, with Sugrue introduction.

ARTICLES AND BOOK CHAPTERS (* peer-reviewed)

* "The Hard Work of Segregation: Arnold Hirsch and Critical Histories of Race," in *Segregating Cities: Policy and Practice in Modern America*, ed. Thomas J. Sugrue (University of Chicago Press, in press).

* "Latinos on the Crabgrass Frontier: Migrants, Immigrants, Race, and the Transformation of Postwar Suburbia," in A.K. Sandoval-Strausz, ed., *Metropolitan Latinidad: Transforming American Urban History* (University of Chicago Press, 2025), 61-79.

Foreword to Brian Goldstein, *The Roots of Urban Renaissance: Gentrification and the Struggle over Harlem* (Princeton University Press, 2023), ix-xiv.

♦ Reprinted in *The Architect's Newspaper*, March 14, 2023.

* "Introduction: Preexisting Conditions," in *The Long Year: A 2020 Reader*, ed. Thomas J. Sugrue and Caitlin Zaloom (Columbia University Press, 2022), 1-15.

"Communicants, Community, and Capital: Parish Boundaries, Race, and Catholicism," *American Catholic Studies* 132:3 (2021), 8-13.

* "Historicizing the Neoliberal Metropolis," with Andrew J. Diamond, in *Neoliberal Cities: The Remaking of Postwar Urban America*, ed. Andrew J. Diamond and Thomas J. Sugrue (NYU Press, 2020), 1-12.

"Livable Cities," in *We Own the Future: Democratic Socialism American Style*, ed. Kate Aronoff, Peter Dreier, and Michael Kazin (The New Press, 2020), 207-222.

Thomas J. Sugrue   **Page 6**

"Predatory Real Estate," in *Antidemocracy in America: Truth, Power, and the Republic at Risk,* ed. Eric Klinenberg, Caitlin Zaloom, and Sharon Marcus (Columbia University Press, 2019), 27-38.

* "A Modest Sized Foundation: Barack Obama's Urban Policy," in *The Obama Presidency: A First Historical Appraisal*, ed. Julian E. Zelizer (Princeton University Press, 2018), 144-161.

> ♦ Reprinted as "Barack Obama's Urban Policy," in *Obama's Fractured Legacy: The Politics and Policies of an Embattled Presidency,* ed. François Vergniolle de Chantal (Edinburgh University Press, 2020).

* "The Black Freedom Struggle in the North," *Oxford Encyclopedia of American Urban History*, Vol. 2., ed. Timothy J. Gilfoyle (Oxford University Press, 2018), 1367-1396.

"The Housing Revolution We Need," *Dissent* 65:4 (Fall 2018), 18-22.

"From Jim Crow to Fair Housing," in Gregory D. Squires, ed., *The Fight for Fair Housing: Causes, Consequences and Future Implications of the 1968 Federal Fair Housing Act* (Routledge, 2018), 14-27.

"The Big Picture: America's Real Estate Developer in Chief," *Public Books*, November 27, 2017.

"Foreword," in *Making Cities Global*, ed., A.K. Sandoval-Strausz and Nancy H. Kwak (University of Pennsylvania Press, 2017), vi-ix.

"Foreword," in *Detroit 1967: Origins, Impacts, Legacies*, ed. Joel Stone (Wayne State University Press, 2017), ix-vii.

* "Less Separate, Still Unequal: Diversity and Equality in 'Post-Civil Rights' America," in *Our Compelling Interests: The Value of Diversity to Democracy and a Prosperous Society,* ed. Earl Lewis and Nancy Cantor (Princeton University Press, 2016), 39-70.

"Remember Working-Class Feminism!" in *Democracy: A Journal of Ideas* 42 (Fall 2016).

"American Studies in Japan: Its History, Present Situation and Future," *Nanzan Review of American Studies* 38 (Winter 2016), 121-129.

* "The Reconfiguration of Political History," *Tocqueville Review/la Revue Tocqueville* 36 (2015), 11-20.

* "'The Largest Civil Rights Organization Today': Title VII and the Transformation of the Public   Sector," *Labor: Studies in Working Class History of the Americas* 11:3 (2014), 25-29.

"Diversity, Toleration, and Space in Metropolitan America," *The Cities Papers: An Essay Collection from the Decent Cities Initiative* (New York: Social Science Research Council, 2014), online.

"Notown," in Anna Clark, ed., *A Detroit Anthology* (Belt Publishing, 2014), 18-23.

"Privatization: Looking Out for the Public Good," 2013 PILCOP Symposium on Equality, 11 *Rutgers Journal of Law and Public Policy* 331 (2013-14).

"The Civil Rights Era and Beyond," in *Preserving American Freedom: The Evolution of American Liberty in Fifty Documents* (Historical Society of Pennsylvania, 2013), online.

"'The Goddamn Boss': Cecil B. Moore, Philadelphia, and the Reshaping of Black Urban Politics," in *Dixie Redux: Essays in Honor of Sheldon Hackney*, ed. Raymond Arsenault and Vernon Burton (New South Press, 2013), 261-286.

"For Jobs and Freedom: An Introduction to the Unfinished March," *Economic Policy Institute* (August 2013), online.

* "The Catholic Encounter with the 1960s," *Catholics in the American Century: Recasting Narratives of U.S. History*, ed. R. Scott Appleby and Kathleen Sprows Cummings (Cornell University Press, 2012), 61-79.

"Pourquoi les villes américaines ne brûlent-elles pas plus souvent?" with Michael B. Katz, in *L'Atlantique multiracial: Discours, politiques, dénis*, ed. James Cohen, Andrew Diamond, and Philippe Vervaecke (Editions Karthala/CERI, 2012), 33-60.

* "Hillburn, Hattiesburg, and Hitler: Wartime Activists Think Globally and Protest Locally," in *Fog of War: The Second World War and the Civil Rights Movement*, ed. Kevin M. Kruse and Stephen Tuck (Oxford University Press, 2012), 87-102.

"Northern Lights: The Black Freedom Struggle Outside the South," *OAH Magazine of History*   26:1 (2012), 1-7.

* "Civil Rights, Civility, and Disruption," in *A Reasonable Understanding: Civility and Democracy in America*, ed. Cornell W. Clayton and Richard Elgar (Washington State University Press, 2012), 18-32.

* "The Right to a Decent Home," *To Promote the National Welfare: The Case for Big Government*, ed. Steven Conn (Oxford University Press, 2012), 102-17.

"City of Ruins," introduction to Yves Marchand and Romain Meffre, *Détroit: vestiges du rêve américain/The Ruins of Detroit* (Steidl Verlag, 2011), 9-15. In French and English.

"Concord Park, Open Housing, and the Lost Promise of Civil Rights in the North," *Pennsylvania Legacies* (November 2010), 18-23.

* "Toward a New History of Civil Rights," *Labor: Studies in Working-Class History of the Americas* 7:1 (2010), 37-44.

* "Jim Crow's Last Stand: The Struggle to Integrate Levittown," *Second Suburb: Levittown, Pennsylvania*, ed. Dianne Harris (University of Pittsburgh Press, 2010), 175-99.

"The End of the '60s," in *The Sixties: A Documentary Reader*, ed. Brian Ward (Wiley-Blackwell, 2009), 225-26.

"Racial Romanticism," *Democracy: A Journal of Ideas* 13 (2009), 69-73.

* "The White Ethnic Strategy," with John David Skrentny, in Bruce Schulman and Julian Zelizer, eds., *Rightward Bound: Making America Conservative in the Seventies* (Cambridge: Harvard University Press, 2008), 171-92.

"Poverty in the Era of Welfare Reform: The 'Underclass' Family in Myth and Reality," in *American Families: A Multicultural Reader*, second edition, ed. Stephanie Coontz (Routledge, 2008), 325-37.

* "Plainfield Burning: Black Rebellion in the Suburban North," with Andrew M. Goodman, *Journal of Urban History* 33 (May 2007), 568-601.

"Driving While Black: The Car and Race Relations in Modern America," in *The Automobile in American Life and Society* (Henry Ford Museum and University of Michigan, 2005), http://www.autolife.umd.umich.edu

"From Motor City to Motor Metropolis: How the Automobile Industry Reshaped Urban America," *Automobile in American Life and Society* (Henry Ford Museum and University of Michigan 2005), http://www.autolife.umd.umich.edu

* "Affirmative Action from Below: Civil Rights, the Building Trades, and the Politics of Racial Equality in the North, 1945-1969," *Journal of American History* 91 (June 2004), 145-73.

> ♦ Reprinted in Joyce Appleby, ed., *Best Articles in American History 2006* (Palgrave Macmillan, 2006), 231-62.

> ♦ Reprinted in Joe William Trotter and Kenneth Kusmer, eds., *African American Urban History Since World War II* (University of Chicago Press, 2009), 219-44.

* "All Politics is Local: The Persistence of Localism in Twentieth-Century America," in Meg   Jacobs, William Novak, and Julian Zelizer, eds., *The Democratic Experiment: New Directions in American Political History* (Princeton University Press, 2003), 301-26.

* "Revisiting the Second Ghetto," *Journal of Urban History* 29 (March 2003), 281-90.

Thomas J. Sugrue   **Page 8**

"The Power of Place: Race, Political Economy, and Identity in the Postwar Metropolis," with Robert O. Self, in Roy Rosenzweig and Jean-Christophe Agnew, eds., *A Companion to Post 1945 America* (Blackwell Publishers, 2002), 20-43.

* "Breaking Through: The Troubled Origins of Affirmative Action in the Workplace," in John David Skrentny, ed., *Color Lines: Affirmative Action, Immigration, and Civil Rights Options for America* (University of Chicago Press, 2001), 31-52.

"Urbanization," in *Oxford Companion to United States History*, ed. Paul Boyer (Oxford University Press, 2001), 794-96.

"The Power of Unlikely Coalitions," *University of Pennsylvania Journal of Labor and Employment   Law* 2 (Spring 2000), 737-45.

"Suburbanization and African Americans," in *Encarta Africana*, ed. Anthony Appiah and Henry Louis Gates, third edition, CD-Rom (Microsoft/Afropaedia LLC, 1999). Reprinted with misattribution in *Africana Encyclopedia*, second edition (Oxford University Press, 2005).

"Poor Families in the Era of Urban Transformation: The 'Underclass' in Myth and Reality," in *Families: A Multicultural Reader*, ed. Stephanie Coontz (Routledge, 1999), 243-57.

"The Compelling Need for Diversity in Higher Education: Expert Report of Thomas J. Sugrue," *University of Michigan Journal of Race and Law* 5 (Fall 1999), 261-310.

* "The Incredible Disappearing Southerner?" *Labor History* 39 (1998), 161-66.

* "Responsibility to the Past, Engagement with the Present," *Labor History* 39 (1998), 60-69.

* "Carter's Urban Policy Crisis," in *The Carter Presidency: Policy Choices in the Post New Deal Era*, ed. Gary Fink and Hugh Davis Graham (University Press of Kansas, 1998), 137-57.

* "The Context of *The Philadelphia Negro*: The City, the Settlement House Movement, and the Rise of the Social Sciences," with Michael B. Katz, in *W.E.B. DuBois, Race, and the City* (University of Pennsylvania Press, 1998), 1-38.

   ♦ Reprinted in Harold Bloom, ed., *W.E.B. DuBois* (Chelsea House, 2001), 177-209.

* "The Tangled Roots of Affirmative Action," *American Behavioral Scientist* 41 (April 1998), 886-87.

"John Hersey and the Tragedy of Race," introduction to John Hersey, *The Algiers Motel Incident* (Johns Hopkins University Press, 1998), ix-xx.

"Labor, Liberalism, and Racial Politics in 1950s Detroit," *New Labor Forum* 1 (1997), 19-25.

* "Segmented Work, Race-Conscious Workers: Structure, Agency, and Division in the CIO Era,"   *International Review of Social History* 41 (1996), 389-406.

"More than Skin Deep: Redevelopment and the Urban Crisis," *Journal of Urban History* 22 (1996), 750-59 (review essay).

"The Politics of Culture in Cold War America," *Prospects: An Annual of American Culture Studies* 20 (1995), 451-54.

* "Reassessing the History of Postwar America," *Prospects: An Annual of American Culture Studies* 20 (1995), 493-509.

* "'Forget about Your Inalienable Right to Work': Deindustrialization and Its Discontents at Ford, 1950-1953," *International Labor and Working-Class History* 48 (1995), 112-30.

"History, Public Policy, and the Underclass Debate," *SSRC Working Paper* (National Center for Children in Poverty, 1995), co-authored with Michael B. Katz.

* "Crabgrass-Roots Politics: Race, Rights, and the Reaction Against Liberalism in the Urban North, 1940-1964," *Journal of American History* 82 (1995), 551-78.

Thomas J. Sugrue Page 9

♦ *Winner of the 1996 Best Article Prize, Urban History Association.*

♦ Reprinted in Jack Davis, ed., *The Civil Rights Movement* (Blackwell, 2000), 64-84.

♦ Reprinted in Raymond A. Mohl and Roger Biles, eds., *The Making of Urban America*, third edition (Rowman and Littlefield, 2011).

♦ Reprinted in James Sabathne and Jason Stacy, eds., *Past Forward: Articles from the Journal of American History,* Vol. 2 (Oxford University Press, 2016), 188-210.

"The Impoverished Politics of Poverty," *Yale Journal of Law and Humanities* 6 (1994), 163-79.

* "The Structures of Urban Poverty: The Reorganization of Space and Work in Three Periods of American History," in *The "Underclass" Debate: Views from History*, ed. Michael B. Katz (Princeton University Press, 1993), 85-117.

♦ Translated and published as "A városi szegénység szerkezete: a tér és a munka újjászervezõdése az amerikai történelem három korszakában," *Budapesti Negyed* 26-27 (1999-2000), 234-74.

* "The Peopling and Depeopling of Early Pennsylvania: Indians and Colonists, 1680-1720," *Pennsylvania Magazine of History and Biography* 116 (January 1992), 3-31.

EXPERT REPORTS

New York Communities for Change v. County of Nassau. No. 602316/2024 (Sup. Ct., Nassau County 2025). Wrote three reports, deposed, and testified.

Priorities USA v. Nessel, 19-13341 (E.D. Mich. 2022). Wrote report, was deposed.

Flores v. Town of Islip, 448 F.Supp.3d 267 (E.D.N.Y. 2020). Two reports, was deposed, testified.

U.S. v. City of Eastpointe, 378 F.Supp.3d 589 (E.D. Mich. 2019). Wrote report, was deposed.

Adkins v. Morgan Stanley, 307 F.R.D. 119, 147-48 (S.D.N.Y. 2015). Wrote report, was deposed.

National Commission on Fair Housing and Equal Opportunity (July 2008). Wrote report, testified.

U.S. v. City of Euclid, 580 F. Supp. 2d 584 (N.D. Ohio 2008). Wrote report, was deposed, testified.

Grutter v. Bollinger, 137 F. Supp. 2d 821 (E.D. Mich. 2001). Wrote report.

Gratz v. Bollinger, 122 F. Supp.2d 811 (E.D. Mich. 2000). Wrote report.

PUBLISHED INTERVIEWS

Interview: "Trump Undercuts Enforcement of the Civil Rights Act of 1964," *Popular Information*, January 23, 2025.

Entretien: Thomas Sugrue: "Après le 11 septembre, un nationalisme simpliste a ressurgi," *AOC/Analyse Opinion Critique,* September 11, 2021. Interviewed by Raphael Bourgois.

Entretien [Interview] Thomas Sugrue: "Trump est le maître du chaos et va tout faire pour compliquer la situation," *L'Obs* [Paris], November 6, 2020. Interviewed by Rémi Noyon.

"Trump Doesn't Understand Today's Suburbs and Neither Do You," *Politico Magazine*, August 4, 2020. Interviewed by Zack Stanton.

Entretien [Interview]: "Une nouvelle conscience des injustices raciales est en train d'émerger aux Etats-Unis," *Alternatives Economiques* [France], June 8, 2020. Interviewed by Régis Meyran.

Entretien [Interview]: "Les conditions d'un soulèvement plus large sont là," *L'Obs* [Paris], June 6, 2020. Interviewed by Rémi Noyon.

"Public Thinker: Thomas J. Sugrue on History's Hard Lessons," interviewed by Destin Jenkins, *Public Books*, April 2, 2019.

"L'historien éclaire-t-il le présent? Entretien avec Thomas J. Sugrue," *La Vie des Idées*, May 25, 2016.

"The Historian as Public Intellectual," interview with Thomas J. Sugrue, *Books and Ideas,* November 2014.

"Detroit: A Lose-Lose Situation for All Involved: An Interview with University of Pennsylvania   Historian Thomas Sugrue," *Toronto Globe and Mail*, July 19, 2013.

"Unconventional Wisdom: Urban Historian Thomas Sugrue Revisits Detroit," interview by W. Kim Heron, *Metro Times*, November 9, 2005.

"Historically Speaking: An Interview with Thomas J. Sugrue," by Julian Zelizer, *Journal of Multi-Media History* 2 (Fall 1999).

BOOK REVIEWS

"In Praise of the Black Men and Women Who Built Detroit," *New York Times Book Review* (September 10, 2017), review of Herb Boyd, *Black Detroit: A People's History of Self-Determination*.

"White Trash," *New York Times Book Review* (June 19, 2016), review of Nancy Isenberg, *White Trash: The 400-Year Untold History of Class in America*.

"Inner City Blues," *Bookforum* (Summer 2016), review of Mitchell Duneier, *Ghetto: The Invention of a Place, The History of an Idea*.

"Shut Out," *New York Times Book Review* (July 5, 2015), review of Kristen Green, *Something Must be Done about Prince Edward County: A Family, A Virginia Town, A Civil Rights Battle*.

"Notown," *Democracy* (Spring 2013), 116-23, review of Mark Binelli, *Detroit City is the Place to Be: The Afterlife of an American Metropolis*.

♦ Revised, reprinted in *The Detroit Reader*, ed. Anna Clark (Cleveland: Belt Publishing, 2014).

"Empire and Revolution," *The Nation* (October 15, 2012), review of Joshua Freeman, *American   Empire: The Rise of a Global Power, The Democratic Revolution at Home, 1945-2000*.

"Chicago and the Primacy of the Social," *Public Books* (September 2012), review of Robert Sampson, *Great American City*.

"Lincoln, Resurrected," *Dissent* (Fall 2010), 106-09, review of Michael Burlingame, *Abraham   Lincoln: A Life*.

"Levittown to Laos," *London Review of Books* (July 22, 2010), review of Steven M. Gillon, *The   Kennedy Assassination: 24 Hours After*.

Douglas Blackmon, *Slavery by Another Name: The Re-Enslavement of Black Americans from the Civil War to World War II, Firedoglake* (August 16, 2009).

"The Hundred Days War," *The Nation* (April 27, 2009), review of H.W Brands, *Traitor to His   Class: The Privileged Life and Radical Presidency of Franklin Delano Roosevelt* and Adam   Cohen, *Nothing to Fear: FDR's Inner Circle and the Hundred Days that Created Modern America*.

"It's Not the Bus, It's Us," *London Review of Books* (November 20, 2008), review of Louis Masur, *The Soiling of Old Glory*.

"Orthogonian Visions," *The Nation* (September 1/8, 2008), review of Rick Perlstein, *Nixonland*. Letter and Sugrue response, *The Nation* (October 6, 2008).

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Thomas J. Sugrue   **Page 11**

"Hearts and Minds," *The Nation* (May 12, 2008), review of Richard Thompson Ford, *The Race Card*; Randall Kennedy, *Sellout*; Bill Cosby and Alan Poussaint, *Come on People*; and Stephen Steinberg, *Race Relations: A Critique.*

"In Your Guts You Know He's Nuts," *London Review of Books* (January 3, 2008), 29-31, review of Barry Goldwater, *Conscience of a Conservative.*

"Shanker Blows Up the World," *The Nation* (November 12, 2007), 36-41, review of Richard Kahlenberg, *Tough Liberal: Albert Shanker and the Battles over Schools, Unions, Race, and Democracy* and Joshua Zeitz, *White Ethnic New York: Jews, Catholics, and the Shaping of Postwar Politics.* Letters to the Editor and Sugrue response, *The Nation* (December 10, 2007), 3, 60.

"A Flawed Look at Tensions in Chicago Neighborhoods," *Chicago Tribune* (Oct. 22, 2006), review of William Julius Wilson and Richard Taub, *There Goes the Neighborhood: Racial Ethnic and Class Tensions in Four Chicago Neighborhoods and their Meaning for America.*

"AmeriKKKa," *London Review of Books* (October 5, 2006), 17-20, review of Raymond Arsenault, *Freedom Rides: 1961 and the Struggle for Racial Justice.*

"The Geography of Fear," *The Nation* (February 27, 2006), 40-44, review of Robert Bruegmann, *Sprawl: A Compact History*; Robert M. Fogelson, *Bourgeois Nightmares*; and James Loewen, *Sundown Towns.* Breugmann Letter to Editor and Sugrue response, *The Nation* (October 2, 2006), 2.

> ♦ Reprinted in *Designer/Builder: A Journal of the Human Environment* 8:4 (Nov.-Dec. 2006), 7-12.

"Separate and Unequal--Still," *Chicago Tribune* (Sept. 11, 2005), 1, review of Jonathan Kozol, *The Shame of the Nation: The Restoration of Apartheid Schooling in America.*

Review: Joshua Freeman, *Working-Class New York,* in *International Labor and Working-Class History* 62 (Fall 2002), 240-42.

"Terror in the Streets," *Washington Post Book World* (March 10, 2002), 6, review of James S. Hirsch, *Riot and Remembrance: The Tulsa Race War and Its Legacy*, Alfred Brophy, *Reconstructing the Dreamland: The Tulsa Race Riot of 1921*, and Tim Madigan, *The Burning: Massacre, Destruction and the Tulsa Race Riot of 1921.*

"Teamster Spirit," *Washington Post Book World* (Sept. 2, 2001), review of Thaddeus Russell, *Out of the Jungle: Jimmy Hoffa and the Remaking of the American Working Class.*

"The Real Revolution," *Washington Post Book World* (Sept. 17, 2000), 1, 3, review of Evan Thomas, *Robert Kennedy: A Life* and Matthew Dallek, *The Right Moment: Ronald Reagan's First Victory and the Decisive Turning Point in American Politics.*

> ♦ Reprinted as "How Camelot Blinded Liberals to Reagan's Appeal," in *Guardian Weekly,* London (December 28, 2000-January 3, 2001), 23.

Review: Judith Stein, *Running Steel, Running America: Race, Economic Policy, and the Decline of Liberalism in Industrial and Labor Relations Review* 54 (2000), 190-92.

Review: Roger Horowitz, *"Negro and White, Unite and Fight": A Social History of Industrial Unionism in Meatpacking, 1930-1990, Industrial and Labor Relations Review* 52 (1999), 323-25.

Review: Nelson Lichtenstein, *The Most Dangerous Man in Detroit: Walter P. Reuther and the Fate of   American Labor;* Kevin Boyle, *The UAW and the Heyday of American Liberalism;* and Stephen   Amberg, *The Union Inspiration in American Politics: The Autoworkers and the Making of a   Liberal Industrial Order* in *International Labor and Working-Class History* 52 (Fall 1997), 243-48.

"Breakthrough Books: The Welfare State," contributor, *Lingua Franca* (August 1997), 14.

"1995 North American Labor History Conference" (with Rick Halpern, Ardis Cameron, and Walter Licht), *International Labor and Working-Class History* 51 (1997), 151-55.

Thomas J. Sugrue   **Page 12**

"Poor Vision" *Tikkun* (September/October 1995): 87-90, review of Herbert Gans, *The War Against the Poor*.

Review: Irving Bernstein, *Promises Kept: John F. Kennedy's New Frontier,* in *Presidential Studies Quarterly* 23 (Spring 1993), 378-80.

Review: William Cronon, *Changes in the Land: Indians, Colonists and the Ecology of New England* and Neal Salisbury, *Manitou and Providence: Indians, Europeans, and the Making of New England, 1500-1643* in *History Workshop Journal* 27 (1987), 311-14.

SHORT ARTICLES AND OPINION PIECES

"College Presidents Behaving Badly," *Chronicle of Higher Education*, May 6, 2024.

"In the Wake of Affirmative Action: From Cradle to Admissions Office," *Center for Social Solutions, University of Michigan*, October 2023.

"Increase Access to Affordable Housing," in "Biden Wants to Unite the Country: How Can He Do It? Two Dozen Thinkers Offer Bold Ideas for a New Administration in a Fractious Era," *Politico*, January 20, 2021.

"2020 is not 1968: To understand today's protests, you must look further back," *National Geographic,* June 11, 2020. Spanish translation: June 12, 2020. Portuguese translation, June 17, 2020. Italian translation, June 23, 2020.

"Stop comparing today's protests to 1968," *Washington Post*, June 11, 2020.

"A Legislative Mid-Life Crisis: Now Past 50, the Civil Rights and Voting Rights Acts Face New Challenges," *NYU News*, October 18, 2019. Reprinted at *Futurity.com*.

"Civility Wars," *New York Times*, June 30, 2018.

"In Memoriam: Arnold Hirsch (1949-2018): Iconic Scholar of Race and Cities," *National Book Review*, March 23, 2018.

"Arnold Hirsch, 1949-2018," *Urban History Newsletter*, Spring 2018.

"What Next for Detroit?" Interview with Camilo José Vergara, *Public Books*, May 4, 2017.

"Donald Trump Says He Wants to Fix Cities, Ben Carson Will Make Them Worse," *Sunday Washington Post*, December 18, 2016.

"Jeff Sessions' Other Civil Rights Problem," *New York Times*, November 18, 2016.

"Postscript: Grace Lee Boggs," *The New Yorker,* online, October 8, 2015.

"David Simon's 'Show Me a Hero' Recap: The Genius in David Simon's Pessimism," *The Hollywood Reporter*, August 30, 2015.

"David Simon's 'Show Me a Hero' Recap: Less Springsteen, More Public Enemy Needed," *The Hollywood Reporter*, August 23, 2015.

"David Simon's 'Show Me a Hero' Recap," *The Hollywood Reporter*, August 16, 2015.

"Décryptage. Racisme plaie des États Unis," *France Ouest*, August 10, 2015.

"It's Not Dixie's Fault," *Sunday Washington Post*, July 19, 2015.

"Restoring King," *Jacobin Magazine*, online, January 14, 2014.

> ♦ French translation: "Martin Luther King – Plus radical qu'on ne le croit?" *Revue Ballast*, February 17, 2015.

> ♦ Reprinted in *Tribune Magazine* (UK), January 21, 2019.

♦ Spanish translation: "El verdadera Martin Luther King," *Jacobin América Latina,* January 18, 2024.

"The Rise and Fall of Detroit's Middle Class," *The New Yorker* online, July 22, 2013.

"A More Perfect Union: Barack Obama and the Politics of Unity," *History Now* 36 (Summer 2013).

"Urban History from the Eye of the Storm," *Urban History Association Newsletter* 45 (Spring 2013).

"A House Divided: Why Do Middle-Class Blacks Have Far Less Wealth than Whites at the Same Income Level? The Answer is in Real Estate and History," *Washington Monthly* (Jan/Feb. 2013), 41-44.

♦ Reprinted in *The Wealth Divide,* ed. Noel Marino (Farmington Hills, MI: Greenhaven Press, 2015), 34-43.

"Workers' Paradise Lost," *New York Times,* December 14, 2012.

"Obama, éternel étranger en terrain miné," *Libération* (Paris), October 30, 2012.

"Saul Alinsky: The Activist Who Terrifies the Right," *Salon,* February 7, 2012.

"A Dream Still Deferred," *New York Times,* March 26, 2011.

"President Obama and the Burden of Race," *SAS Frontiers,* August 2010.

"Friday Reading: Diversity, Dogma, and the Dole," *The Atlantic,* online, August 20, 2010.

"Obama's Justice," *The Atlantic,* online, August 19, 2010.

"Kilpatrickism," *The Atlantic,* online, August 18, 2010.

♦ Reprinted in *Philadelphia Inquirer,* August 22, 2010.

"Tough Luck," *The Atlantic,* online, August 17, 2010.

"Hallowed Ground," *The Atlantic,* online, August 16, 2010.

"School Daze," *The Atlantic* online, August 15, 2010.

"The Myth of Post-Racial America," *Washington Post,* June 10, 2010.

"Stories and Legends," *The Nation,* June 6, 2010.

"The New American Dream: Renting," *Wall Street Journal,* August 15, 2009.

"A Nation on Fire," *Talking Points Memo,* March 30-April 3, 2009. Roundtable.

"Obama Must Rise to Urban Challenge," *Detroit Free Press,* February 22, 2009.

"Obama's America," *Talking Points Memo,* January 19-24, 2009. Roundtable.

"The End of the Sixties: The Meaning of the Obama Victory," *Boston Globe,* Nov. 10, 2008.

♦ Reprinted in Brian Ward, ed., *The Sixties: A Documentary History* (Cambridge, 2009).

"Motor City: The Story of Detroit," *History Now* 11 (March 2007), www.historynow.org

"Still a Poor City," *Detroit Free Press,* February 6, 2006.

"Burn, *Bébé,* Burn," *Dissent* (Winter 2006), 5-7.

"Sacramento Gets It Wrong at Detroit's Expense," *Detroit Free Press,* November 12, 2005.

"Protests Then and Now," *Pennsylvania Current,* May 18, 2000.

"Throwaway Land," *Philadelphia Inquirer,* March 28, 1999.

"Detroit Has Yet to Recover from 1950s Turning Point," *Detroit Free Press,* June 1, 1997.

"Urban History at the University of Pennsylvania," *Urban History Newsletter,* Spring 1997, 2.

Thomas J. Sugrue   Page 14

"A Teach-In with the Labor Movement: The Long Road Ahead," *Radical Historians Newsletter* 75 (December 1996), 1, 14-15.

"A Conversation with Howard Fast," *Prospects* 20 (1995), 511-23 (edited interview).

"Talkin' About My Generation: Reflections on the 'Politics of Authenticity,'" *Clio: Politics and History* 4:2 (Spring/Summer 1994), 3-4.

"Bibliography: European Urban History," *Urban History Newsletter* 3 (March 1990), 5-7.

EXCERPTS

"Class, Status, and Residence: The Changing Geography of Black Detroit," in *The American Urban Reader: History and Theory*, second edition, ed., Steven Corey and Lisa Krissoff Boehm (Routledge, 2020), 572-82. Also in first edition (2010). Excerpt from *Origins of the Urban Crisis*.

"'The Damning Mark of False Prosperities' The Deindustrialization of Detroit," in *The Straight: Detroit: America's Premier Legacy City*, ed. Jeffrey T. Horner (Cognella Publishing, 2018), 45-76. Excerpt from *Origins of the Urban Crisis*.

"Detroit 1967," in *Detroit Free Press* (July 23, 2017); *In These Times* (July 21, 2017); *Deadline Detroit* (May 23, 2017). Excerpts from "Foreword" to *Detroit 1967: Origins, Impacts, Legacies*.

"'The Damning Mark of False Prosperities:' The Deindustrialization of Detroit," in *Urban Politics: A Reader*, ed. Stephen J. McGovern (CQ Press, 2016). Excerpt from *Origins of the Urban Crisis*.

"Not Even Past: Barack Obama and the Burden of Race," in *The Charleston Syllabus: Readings on Race, Racism, and Racial Violence*, ed. Chad Williams, Kidada Williams, and Keisha Blain (University of Georgia Press, 2016), 315-21. Excerpt from *Not Even Past*.

"The Continuing Racial Crisis," *Major Problems in American History Since 1945*, ed. Natasha Zaretsky, Mark Lawrence, Robert Griffith, and Paula Baker, fourth edition (Houghton Mifflin, 2014), 272-78. Also in earlier editions (2001, 2007). Excerpt from *Origins of the Urban Crisis*.

"Crabgrass-Roots Politics," in *The Making of Urban America*, third edition, ed. Raymond A. Mohl and Roger Biles (Rowman and Littlefield, 2011). Excerpt from 1995 *JAH* article.

"Racial Confrontation in Post-War Detroit," in *American Urban Politics: The Reader*, ed. Dennis R. Judd and Paul Cantor, sixth edition (Longman, 2010). Also in earlier editions (2006, 2007) Excerpt from *Origins of the Urban Crisis*.

"Stories and Legends," *The Nation*, June 7, 2010. Excerpt from *Not Even Past*.

"The Northernmost Southern City," *Metro Times*, February 25, 2009. Excerpt from *Sweet Land of Liberty*.

"Racism and Urban Decline," *Shrinking Cities: Volume 1: International Research* (Berlin: Hatje Cantz Verlag, 2005). Revised except from *Origins of the Urban Crisis*.

"Niedergang durch Rassissmus," in *Schrumpfende Städte: Band 1: Internationale Untersuchung,* ed. Philipp Oswalt (Hatje Cantz Verlag, 2004), 231-37. Excerpt from *Origins of the Urban Crisis*.

"The Deindustrialization of Detroit," in *Major Problems in American Urban and Suburban History,* ed. Howard P. Chudacoff and Peter C. Baldwin (Houghton Mifflin, 2004). Excerpt from *Origins of the Urban Crisis*.

NAMED LECTURES AND KEYNOTE ADDRESSES

Haverford School (Parker History Lecture), February 2025.

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American University (Annual Lecture, Metropolitan Policy Center), April 2024.

Salve Regina College (McGinty Lecture), April 2023.

Cranbrook Academy of Art (Bauder Lecture), April 2021.

University of Dayton (Beauregard-King Emeriti Lecture), March 2019.

University of Cincinnati (Taft Lectures) September 2018.

Wayne State University and Detroit Historical Society (Van Dusen Lecture), July 2017.

Keynote Address, Association Française des Études Américaines, Annual Meeting, June 2017.

Rutgers University-Newark (Marion Thompson Wright Keynote Lecture), February 2017.

Cabrini College (Jolyon Pitt Girard Scholar in Residence) October 2016.

Keynote Address: American Association of State and Local History, September 2016.

Keynote Address: Nanzan University American Studies 40th Anniversary Symposium, July 2016.

New York University (Henry Hart Rice Urban Policy Lecture), April 2016.

University of Maryland (Rundell Memorial Lecture), April 2016.

University of Notre Dame (Cushwa Center Annual Lecture), April 2016.

Keynote Address, City/Cité, Chicago, November 2015.

Presidential Address: Social Science History Association Annual Meeting, November 2014.

Presidential Address: Urban History Association Biennial Meeting, October 2014.

Keynote Address: The Right to the City, Sorbonne-Paris 4 / University of Paris-10-Nanterre, May 2014.

Keynote Address: Beyond Bankruptcy, Wayne State University, April 2014.

Keynote Address: Association for the Study of Connecticut History Annual Meeting, April 2014.

Keynote Address: Detroit Policy Conference, Greater Detroit Regional Chamber, February 2014.

University of Kansas (William Tuttle Lecture in American Studies), October 2013.

Middle Tennessee State University (Strickland Lecturer), September 2013.

George Mason University (W.E.B. Du Bois Lecture), February 2013.

University of Missouri (Lewis Atherton Memorial Lecture), April 2012.

George Washington University (Elmer Kayser Lecture), March 2012.

Colorado State University, Pueblo (Ludlow Speaker), April 2011.

Rutgers University, New Brunswick, Bloustein School of Planning and Public Policy (Catlin   Lecture), April 2011.

St. Joseph's University (Gerrity Lecture), February 2011.

Pomona College (Hart Lecture), November 2010.

Cranbrook Academy (Sirchio Distinguished Lecturer), October 2009.

Keynote Address, History of Education Society Annual Meeting, October 2009.

Princeton University (Lawrence Stone Lectures in History), April 2009.

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Keynote Address: University of North Carolina, Chapel Hill (The Long Civil Rights   Movement
Conference), April 2009.

Keynote Address, Temple University (Barnes Conference on History), March 2009.

Wayne State University (Van Dusen Forum on Urban Affairs), February 2009.

Oakland University (Phi Alpha Theta Annual Lecture), February 2008.

Keynote Address, Virginia Tech University (Bertoti Graduate Conference), April 2008.

Wayne State University Law School (Izumi Family Scholar-in-Residence), January 2008.

Case Western Reserve University (Baker–Nord Fellow in the Humanities), October 2007.

Ohio Wesleyan University (Sagan National Colloquium: Cities and Suburbs), October 2007.

University of Illinois, Urbana-Champaign (MillerComm Lecture: Landscape Architecture, History, and Center for
Advanced Study), Feb. 2007.

Albion College (Coy James Memorial Lecture), February 2007.

Calvin College (Donald Bouma Lecture in Sociology and Social Work), May 2006.

Emory University (Lockmiller Seminar in History), March 2006.

Lovett Memorial Library, Philadelphia (George Schermer Memorial Lecture), November 2004.

Trinity School, New York (Miles Satterthwaite Lecture in New York History), October 2004.

University of Rochester (Verne Moore Lecture in History), September 2004.

Keynote Address, Princeton University, Shelby Culllom Davis Center, Conference on the New Suburban History,
February 2004.

Washington University, Saint Louis (Siegle Lecture and Seminars in American Studies), September-October 2003.

Boston University (Bacon Lecture), May 2003.

University at Albany, SUNY (Lewis Mumford Lecture in Urbanism), April 2003.

Emporia State University (Boertman Lecture), April 2003.

Keynote Address: The City and Civic Virtue Conference, Wayne State Univ., March 2003.

Boston College (Lowell Lecture), September 2002.

University of Missouri-St Louis (McKinzie Symposium), March 2001.

Keynote Address: Urban Studies Forum, University of Wisconsin, Milwaukee, April 2000.

Brandeis University (Weiner Lecture in History), February 2000.

Keynote Address: The Racial Economy of Postwar Urban California, Stanford Univ., May 1999.

Ithaca College (Mayrock Lecture in History), April 1999.

Keynote Address: League of Women Voters, Pennsylvania: Welfare Reform and Self-   Sufficiency:
Strategies for 1999 and Beyond, March 1999.

Vassar College (C. Mildred Thompson Lecture in History), February 1999.

Keynote Address: Delaware Valley Grantmakers Annual Meeting, October 1998.
University of Michigan, Ann Arbor (Parks/King/Chavez Visiting Professor in Sociology), February 1998.

University of Detroit-Mercy (University Lecture), February 1998.

Brown University (Charles Colver Lecture in Urban Studies), April 1994.

INVITED LECTURES, SEMINARS, AND WORKSHOPS

University of Notre Dame, History Department, November 2025.

Universidade Federal Fluminense, Niteroi, RJ, Brazil, June 2025.

Institute for Public Knowledge, February 2025.

British Academy, Imagining the Urban Future, January 2025.

University of Pennsylvania, FHA Rental Housing Workshop, October 2024.

Institute for Public Knowledge, October 2024.

NEH Summer Seminar, Eastern Michigan University, July 2024.

University of Oxford, Rothermere American Institute, June 2024.

Vanderbilt University, New Deal Workshop, May 2024.

Penn State University, Latino/as and U.S. Political History Workshop, April 2024.

National Association of Realtors, April 2024.

Boston College, History, February 2024.

Sorbonne Université, Paris, November 2023.

State Museum of Pennsylvania, June 2023.

Graduate Center, City University of New York, May 2023.

Brown University, Urban Studies, April 2023.

University of Michigan, Eisenberg Institute for Historical Studies, April 2023.

Princeton School of Public and International Affairs and Princeton Public Library, December 2022.

University of Pennsylvania, Economic History Workshop, September 2022.

University of Virginia, Jefferson National Fellows Program, May 2022.

Penn State University, Latino Studies and History, May 2022.

New York Institute for the Humanities, December 2021.

University of Detroit Mercy, November 2021 (online).

University of Virginia, Jefferson National Fellows Program, September 2021.

Rock Leadership Speakers Series-II, Detroit, April 2021 (online).

Fondation Maison des Sciences de l'Homme and Ecole Practique des Hautes Etudes, Paris, February 2021 (online).

Christ Church, Grosse Pointe, Michigan, January 2021 (online).

Institute for Public Knowledge, NYU, January 2021 (online).

Rock Leadership Speakers Series-I, Detroit, December 2020 (online)

Rice University, School of Architecture, November 2020 (online).

Detroit Chapter DSA, September 2020 (online).

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National History Center, Washington, DC, June 2020 (online).

New York Historical Society, January 2020.

Escola Parque, Rio de Janeiro, Brazil, November 2019.

Harvard University, Hutchins Center for African and African American Research, September 2019.

University of Chicago, May 2019.

University of Wisconsin, Madison, April 2019.

Tulane University, April 2019.

University of New Orleans, Honors College, April 2019.

University of Texas, Austin, Center for the Study of Race and Democracy, February 2019.

University College London, Institute of the Americas, January 2019.

American Institutes for Research, Board of Directors Meeting, June 2018.

Minnesota History Center, St. Paul, MN, March 2018.

Columbia University, Graduate School of Architecture, Planning, and Preservation, January 2018.

Temple University, Center for the Humanities, October 2017.

City/*Cité*, Detroit, July 2017 (co-organizer, keynote speaker).

City of Detroit Planning Commission, July 2017.

Arab-American National Museum, Dearborn, MI, July 2017.

Sorbonne Université, Paris, May 2017.

Ecole des Hautes Etudes en Sciences Sociales, Paris, May 2017.

Cambridge University, American History Seminar, January 2017.

Miller Center for Public Affairs, University of Virginia, November 2016.

Institute for New Economic Knowledge, Detroit, November 2016.

Gilder-Lehrman Institute for Teachers, Staten Island, October 2016.

Andrew W. Mellon Foundation/National Press Club, Washington, September 2016.

Toyota International Association, Toyota City, Japan, July 2016.

Nanzan University, Nagoya, Japan, July 2016.

University of Pennsylvania, Presidential Campaign Roundtable, July 2016.

City University of New York, Center for Lesbian and Gay Studies, April 2016.

Germantown Historical Society, April 2016.

Columbia University, Seminar on the City, April 2016.

Princeton University, School of Architecture, March 2016.

Institut de Sciences Politiques (Sciences Po), Paris, March 2016.

London School of Economics (LSE Cities), January 2016.

Gilder-Lehrman Institute for Teachers, Moorestown, NJ, December 2015.

Labyrinth Books, Princeton, NJ, November 2015.

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Gilder-Lehrman Institute, New York, NY, November 2015.

University of Virginia, Miller Center, October 2015.

University of Utah, Tanner Center for the Humanities, October 2015.

Social Science Research Council, Decent City Initiative, September 2015.

University of California, Santa Barbara, September 2015.

Harvard University, Safra Center for Ethics, September 2015.

Historical Society of Pennsylvania, NEH Summer Institute, July 2015.

Université de Paris-8 (St-Denis), June 2015.

Ford Foundation, Board of Directors Meeting, Opening Speaker, June 2015.

National Museum of American Jewish History, May 2015.

Yale University, Institute for Social and Policy Studies, May 2015.

University of South Carolina, February 2015.

Stanford University Law School, February 2015.

Mercer Museum, Doylestown, PA., February 2015.

Free Library of Philadelphia, February 2015.

The Sorbonne--Université Paris-4, December 2014.

New York University, Center for Borderland Studies, November 2014.

Andrew W. Mellon Foundation, November 2014.

National Museum of American Jewish History, November 2014.

University of Southern California Law School, October 2014.

University of California, Los Angeles, History, October 2014.

Cornell University, Center for the Study of Inequality, September 2014.

Citizens Research Council of Michigan, September 2014.

École des Hautes Études en Sciences Sociales, Paris, June 2014.

University of Heidelberg, Germany, June 2014.

University of Paris--Sorbonne, May 2014.

Social Science Research Council, May 2014.

Woodrow Wilson International Center for Scholars, May 2014.

University of California, Berkeley, City and Regional Planning, April 2014.

University of New Mexico, March 2014.

Clements Center, Southern Methodist University, March 2014.

Museum of the City of New York, February 2014.

Detroit Regional Chamber of Commerce, February 2014.

New York University, Metropolitan Studies, February 2014.

Federal Reserve Bank of Chicago, Detroit Branch, November 2013.

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Gilder-Lehrman Institute, Morristown, NJ, November 2013.

Social Science Research Council, October 2013.

Arcadia University (Rendell Center), October 2013.

Public Interest Law Center of Philadelphia, September 2013.

Gilder-Lehrman Institute, Boston, July 2013.

University of Delaware (Teaching American History), July 2013.

Technion: Israel Institute of Technology (City Planning and Sociology), May 2013.

Tel Aviv University, (American Civilization/Law School/Roth Institute), May 2013.

University of Chicago, Chicago Center for Contemporary Theory, April 2013.

Social Science Research Council, April 2013.

University of Pittsburgh, February 2013.

Brown University, February 2013.

University of Miami, February 2013.

Princeton University, December 2012.

Franklin and Marshall College, October 2012.

Marshall University, September 2012.

Association of Alternative Newsmedia, June 2012.

Johns Hopkins University, April 2012.

Harvard University, John F. Kennedy School of Government, April 2012.

Holy Cross College, March 2012.

Macalester College, March 2012.

Henry Ford Museum, January 2012.

Metropolitan Minds/Mount Airy USA, January 2012.

École des Hautes Études en Sciences Sociales, Paris, December 2011.

Universidad Torcuato Di Tella, Buenos Aires, Argentina, August 2011.

Centro de Estudios Americanos, Buenos Aires, August 2011.

U.S. Embassy, Buenos Aires, August 2011.

University of Delaware/Teaching American History, July 2011.

Université de Paris-7, Denis-Diderot, June 2011.

U.S. Department of Housing and Urban Development, June 2011.

Montgomery Community College, Teaching American History, June 2011.

Scotch Plains Public Library, May 2011.

Macomb County Community College, April 2011.

Eastern Michigan University, April 2011.

University of Chicago (History), April 2011.

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Louisiana State University, March 2011.

Washington State University, Foley Institute, March 2011.

University of Michigan, Dearborn, February 2011.

Temple University, February 2011.

University of Virginia, Miller Center for Public Affairs, January 2011.

Russell Sage Foundation, January 2011.

Richard M. Nixon Library, December 2010.

Northwestern University, November 2010.

Temple University, November 2010.

University System of Georgia, October 2010.

University of Chicago, Harris School, October 2010.

Historical Society of Pennsylvania/NEH Summer Seminar, July 2010.

Temple University, July 2010.

Princeton Public Library, June 2010.

Organization of American Historians/Philadelphia Community College, June 2010.

American Bar Foundation, April 2010.

University of Chicago, April 2010.

Lorenzo Humanities Center, Macomb County Community College, April 2010.

Rutgers University-Camden, April 2010.

Princeton University, March 2010.

University of Maryland, Provost's Conversation Series, March 2010.

Richard Stockton College of New Jersey, March 2010.

New Detroit, March 2010.

National Constitution Center, March 2010.

New School for Social Research, March 2010.

Columbia University, Lehman Center, December 2009.

New Jersey Council for History Education, December 2009.

St. Joseph University, November 2009.

Woodrow Wilson International Center for Scholars, November 2009.

Canisius College, October 2009.

Germantown Historical Society, August 2009.

Université de Paris-7, Denis-Diderot, June 2009. Half-day seminar on *Sweet Land of Liberty*

Université de Lille-3, Charles-de-Gaulle, June 2009.

Slought Foundation, Philadelphia, May 2009.

Lovett Memorial Library, Philadelphia, March 2009.

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Wayne State University, February 2009.

University of California, Berkeley, February 2009.

University of Virginia (Miller Center for Public Affairs), January 2009.

Newberry Library, December 2008. Half-day conference on *Sweet Land of Liberty*.

Harvard University (Graduate School of Design), November 2008.

Harvard University (Charles Warren Center), October 2008.

Denison University (McGregor Urbanscapes Series), September 2008.

University of Delaware (Teaching American History/DOE), July 2008.

University of Notre Dame (Cushwa Center), April 2008.

City Connect Detroit, April 2008.

University of California, Santa Barbara, February 2008.

Michigan Region, Anti-Defamation League, January 2008.

Cleveland State University (Levin College of Urban Affairs), October 2007.

Columbia University (20th Century American Politics and Society Seminar), Sept. 2007.

Cornell University (School of Architecture, Art, and Planning), September 2007.

Nanzan University, Japan (OAH-JAAS Visitor), July-August 2007.

Kitakyushu University, Japan (University Lecture), July 2007.

Yale Law School (Legal Theory Seminar), May 2007.

Princeton University (Shelby Cullom Davis Center), May 2007.

Metropolitan College, New York (Urban Dialogues), May 2007.

Southern Methodist University (Clements Center for Southwest Studies), Feb. 2007.

University of Baltimore (History), November 2006.

University of Michigan, Dearborn (Difficult Dialogues), October 2006.

Neighborhood Alliance for a Better Riverfront (Casino Forum), September 2006.

Oxford University (Rothermere American Institute), April 2006.

Institute for Advanced Study (School of Social Science), February 2006.

Minnesota Historical Society (OAH Distinguished Lecture), January 2006.

Temple University (Institute for Public Affairs and History), January 2006.

Princeton University (History), December 2005.

University of British Columbia (Urban Studies and History), November 2005.

Simon Fraser University (Living the Global City Lecture Series), November 2005.

Historical Society of Pennsylvania (Annual Lecture), November 2005.

Columbia University (Institute for Research on African American Studies), October 2005.

Philadelphia Heritage Initiative (OAH Distinguished Lecture), June 2005.

Oxford University (Rothermere American Institute), May 2005.

Thomas J. Sugrue   **Page 23**

Cambridge University (History), May 2005.

Technical University of Berlin (Transatlantisches Graduiterenkolleg), May 2005.

Philadelphia Jewish Federation, January 2005.

University of Delaware (History), October 2004.

Lake Forest College (History), April 2004.

Chicago Seminar on the City, Chicago Historical Society, April 2004.

University of Oklahoma (Honors College), March 2004.

Harvard University (John F. Kennedy School of Government), February 2004.

Harvard University (Charles Warren Center), December 2003.

La Salle University (Catholic Studies), October 2003.

University of Michigan (Race and American Political Development Series), Oct. 2003.

Fund for an Open Society, June 2003.

Wayne State University (Humanities Center), March 2003.

Detroit University of Pennsylvania Alumni Association, March 2003.

Duke University (History and Public Policy), October 2002.

Massachusetts Historical Society (Immigration and Urban History Seminar), September 2002.

Katz Jewish Community Center, Cherry Hill, NJ, June-July 2002.

New School University (Political Science), April 2002.

Seminar in the Comparative History of Labor, Industry, Technology and Society (Emory, Georgia State, and Georgia Tech), November 2001.

Carnegie-Mellon University (Center for African American Urban Studies), October 2001.

Drexel University (Technology and Society), October 2001.

Madonna University (NEH Summer Seminar), July 2001.

Marygrove College (Defining Detroit Lecture), February 2001.

University of Michigan, Dearborn (Chancellor's Inauguration), November 2000.

Thomas Campbell Cleveland Seminar on the City, October 2000.

Cleveland State University (History), October 2000.

Case Western Reserve University (History), October 2000.

Harvard University (Afro-American Studies, NEH Summer Seminar), July 2000.

American Philosophical Society (Jefferson Day Lecture), June 2000.

University of California, San Diego (Sociology, History, Urban Studies), June 2000.

University of Chicago (History), March 2000.

Indiana University, South Bend (History and Sociology), March 2000.

Lutheran Theological Seminary of Philadelphia, March 2000.

Fairfield University (History), November 1999.

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Harvard University (NEH Summer Seminar), July 1999.

Stanford University (History), May 1999.

Frankford Community Development Consortium, May 1999

Hamilton College (Political Science), April 1999.

Union College (History), April 1999.

York University, Toronto (History and Urban Studies), March 1999.

New York State Career Options Institute/SUNY Albany, March 1999.

University of Michigan (History), January 1999.

College of William and Mary (American Studies), December 1998.

Southeast Michigan Community Foundation, November 1998.

Brookings Institution (Center for Urban and Metropolitan Affairs), July 1998.

Harvard Club, New York, July 1998.

Detroit Free Press, July 1998.

Rutgers University, New Brunswick (Political Science), April 1998.

New York University (History), March 1998.

University of Washington, Seattle (History and Labor Studies), March 1998.

Boston University (Center for the Study of Race and Social Division), March 1998.

University of Detroit-Mercy (University Lecture), February 1998.

Congregation T'Chiyah, Detroit, February 1998.

Franklin and Marshall College (American Studies), November 1997.

College of New Jersey (History), October 1997.

U.S. Department of Justice (Civil Rights Division), April 1997.

Jimmy Carter Presidential Library, Atlanta, Georgia, February 1997.

University of Virginia (History), January 1997.

Penn National Commission on Society, Culture, and Community, December 1996.

Harvard University (Amer. Political Development Seminar/Taubman Center), Nov. 1996.

University of Delaware (Seminar on Technology, Society, and Culture), November 1996.

Columbia University (Seminar on Twentieth-Century Politics and Society), April 1996.

City University of New York (Center for the Humanities), April 1996.

Hospital Graduates Society of New York, April 1996.

University of Iowa (Consortium on Recent United States History), April 1996.

Philadelphia Festival Theatre for New Plays, March 1996.

Annenberg Theatre, Philadelphia, November 1995.

Trinity College, Hartford (Urban Affairs Forum), October 1995.

Twentieth-Century Fund (Working Group on the Future of Liberalism), July 1995.

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Pennsylvania State University (Labor History Seminar), February 1995.

Penn Club of New York, February 1995.

Columbia University (Seminar on the City), February 1992.

Chicago Historical Society (Urban History Seminar), November 1991.

CONFERENCE PRESENTATIONS

Organization of American Historians, Annual Meeting, Philadelphia, April 2026 (on program)

Making and Unmaking the City, HUF-Detroit, October 2025.

Urban History Association, Biennial Meeting, Los Angeles, October 2025.

CIFAR Humanity's Urban Future (HUF), Meeting, Brussels, May 2025.

Business History Association, Annual Meeting, Atlanta, March 2025.

Imag(in)ing the Urban Future, British Academy, January 2025.

Urban Affairs Association, Annual Meeting, New York, April 2024.

NYU School of Law/Yale Law School, The Legal History of the 1920s, April 2024.

Urban History Association, Biennial Conference, October 2023.

Organization of American Historians Annual Meeting, April 2023.

Business History Conference, March 2023, Opening Plenary Session.

Society of American City and Regional Planning History Biennial Meeting, October 2022.

Urban History Association, Biennial Conference, October 2020 (program cancelled due to pandemic).

Social Science History Association Annual Meeting, November 2019.

The Urban World: Conference in Honor of Kenneth T. Jackson, Columbia Univ., November 2019.

Organization of American Historians Annual Meeting, April 2019.

Urban History Association, Biennial Conference, October 2018.

City/*Cité,* St Louis, October 2018 (co-organizer, moderator).

Association Française des Études Américaines, Nice, France, May 2018.

Organization of American Historians Annual Meeting, April 2018 (comment).

Organization of American Historians Annual Meeting, April 2017.

Appraising the Obama Presidency, Université de Paris-7, December 2016.

City/*Cité,* Paris (co-organizer, panelist), December 2016.

The Obama Presidency in Retrospective, Princeton University, November 2016.

Urban History Association, Annual Meeting, Chicago, October 2016.

The Future of the African American Past, Smithsonian Institution, May 2016.

New York Institute for the Humanities, The Black Lives Matter Effect, April 2016.

Organization of American Historians Annual Meeting, April 2016.

City/*Cité,* Chicago, November 2015 (co-organizer, panelist).

Andrew W. Mellon Foundation: Architecture/Urbanism/Humanities Omnium, St. Louis, Oct. 2015.

Society of U.S. Intellectual Historians Annual Meeting, October 2015 (comment).

Seeing Beyond the Partisan Divide, Miller Center, University of Virginia, October 2015 (comment).

Beyond the New Deal Order, University of California, Santa Barbara, September 2015.

American Historical Association Annual Meeting, January 2015 (chair).

The Future of North American Studies, Fortieth Anniversary CENA/EHESS, Paris, June 2014.

American Jewish Historical Society, 2014 Biennial Scholars' Conference on American Jewish History, Atlanta, June 2014 (featured plenary speaker).

Organization of American Historians Annual Meeting, April 2014

American Historical Association Annual Meeting, January 2014 (chair and comment).

Social Science History Association Annual Meeting, November 2013.

Urban History Association, October 2012.

American Association of Alternative Newsmedia, June 2012.

Organization of American Historians, April 2012.

American Historical Association, January 2012.

Society for American City and Regional Planning History, November 2011.

Eastern Sociological Association, Annual Meeting, February 2011.

Urban History Association, Biennial Meeting, Las Vegas, October 2010.

American Society of Church History Annual Meeting, January 2010.

American Society for Legal History Annual Meeting, Nov. 2009 (roundtable on *Sweet Land of Liberty*).

Southern Historical Association Annual Meeting, November 2009.

Organization of American Historians, Annual Meeting, March 2009.

The Worlds of Marcus Garvey, University of Pennsylvania, March 2009.

World Economic Forum, Global Agenda Councils, Dubai, November 2008.

Social Science History Association, October 2008 (roundtable on *Sweet Land of Liberty*).

The Historical Society, Annual Meeting, June 2008.

Organization of American Historians, Annual Meeting, March 2008 (plenary session).

Renaissance Weekend, Santa Barbara, California, February 2008.

Social Science History Association Annual Meeting, November 2007.

American Studies Association Annual Meeting, October 2007.

Association for Asian-American Studies Annual Meeting, April 2007.

Rethinking the Racial Politics of New Deal Citizenship, Sarah Lawrence College, April 2007.

American Planning Association Annual Meeting, April 2007.

Organization of American Historians Annual Meeting, March-April 2007.

Miller Center Fellows Conference, University of Virginia, May 2006 (plenary and comment).

Michigan Civil Rights Summit, March 2006 (plenary).

Urban History Association Biennial Meeting, October 2004 (chair and comment).

Policy History Conference, May 2004 (panelist, chair and comment).

University of Virginia, Miller Center Fellows Conference, May 2004 (comment).

American Historical Association Annual Meeting, January 2004 (panelist and chair).

Social Science History Association Annual Meeting, November 2004 (panel and comment).

American Political Science Association, Annual Meeting, August 2003 (comment).

Spencer Foundation Dissertation Fellows Conference, October 2002 (comment).

Urban History Association Meeting, September 2002 (comment).

Pax Christi USA Annual Assembly, July 2002.

Society for American City and Regional Planning History Meeting, November 2001.

Miller Center Fellows Conference, University of Virginia, May 2001 (comment).

Liberty and Equality, Historical Society of Pennsylvania, April 2001 (chair and comment).

American Historical Association Annual Meeting, January 2001.

Reassessing the Great Society, Miller Center, University of Virginia, November 2000.

American Studies Association Annual Meeting, October 2000.

Democracy in America: The Promise of American Political History, MIT, September 2000.

American Sociological Association Annual Meeting, August 2000.

American Historical Association Annual Meeting, January 2000.

Organization of American Historians Annual Meeting, April 1999.

Labor and Civil Rights: Rethinking the Connections, Penn Law School, March 1999.

Regionalism: Promise and Problems, SUNY Buffalo Law School, March 1999.

Jews and the Urban Experience, Cohn-Haddow Center for Judaic Studies, Wayne State University, March 1999.

Healing History: The Story of Racial Integration in Mount Airy, Pennsylvania Humanities Council/West Mount Airy Neighbors, March 1999.

Social Science History Association Annual Meeting, November 1998.

Race and Liberalism in the Postwar North, Smithsonian Institution (African American History) and Operation Rainbow/PUSH, Chicago, October 1998.

American Political Science Association Annual Meeting, August 1998.

Organization of American Historians Annual Meeting, April 1998.

American Historical Association Annual Meeting, Seattle, January 1998.

Social Science History Association Annual Meeting, Oct. 1997 (roundtable on O*rigins*).

National Community Reinvestment Council, Washington, DC, September 1997.

William Penn Foundation Colloquium on Reexamining Community Development: The New Economic and Policy Realities, January 1997.

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Social Science History Association Annual Meeting, October 1996.

North American Labor History Conference, October 1996.

Princeton University, Conference on American Conservatism from Redemption through   Reaganism, May 1996 (chair and comment).

Social Science History Association Annual Meeting, November 1995 (comment).

North American Labor History Conference, October 1994 (comment).

German Historical Institute Conference on Race and Ethnicity, September 1994.

Politics and Culture in Cold War America, Penn, March 1994 (organizer and panelist).

American Historical Association Annual Meeting, January 1994.

Social Science Research Council, Persistent Urban Poverty Policy Conference, November 1993.

Univ. of Wisconsin/Wisconsin Historical Society, Toward a History of the 1960s Conference, April 1993.

UNESCO International Social Science Council, 4th Comparative Research on Poverty Conference, Paris, April 1993.

North American Labor History Conference, October 1992.

American Political Science Association Annual Meeting, September 1992.

SSRC Conference on the Urban Underclass: Perspectives from the Social Sciences, June 1992.

Organization of American Historians Annual Meeting, April 1992.

American Historical Association Annual Meeting, December 1991.

TEACHING EXPERIENCE

Graduate Courses

State of the Field: 20th Century U.S. History (with Maria Montoya)

American Politics from the New Deal to Neoliberalism

Race, Politics, and Inequality in Twentieth-Century America

Civil Rights in Modern America

Twentieth-Century U.S. History

Post-1945 U.S. History

American Politics since 1865 (with Steven Hahn)

Civil Rights and Religion in America

Race, Inequality, and the City in the United States

Urban Uprisings (with Sophie Gonick)

NYU Urban Fellows Seminar (with Gianpaolo Baiocchi)

Research Seminar on American History

Varieties of Political History

Undergraduate Courses

Thomas J. Sugrue   **Page 29**

America in the 1960s. Cross listed with History and SCA

Race, Inequality, and American Cities. Cross listed with SCA and History

Law and Order: Policing and Imprisonment in American History, Cross listed with History and SCA

Approaches to Metropolitan Studies

Comparative Global Urbanism (with Sophie Gonick)

Contested Cities: Difference, Inequality, and the Metropolis

Race and the Metropolis. Cross listed with Urban Studies and History

Perspectives on Urban Poverty. Cross listed with Urban Studies, History, and Sociology

Institutions and Urban Change, 1940-1990. Cross listed with Urban Studies and History

Politics and Society in the U.S., 1877-1933. Cross listed with History and Urban Studies

American Politics and Public Policy. Cross listed with Political Science and History

The Rise and Fall of the New Deal Order

Civil Rights in Modern America

The Affirmative Action Debate

Penn Institute for Urban Research, Undergraduate Urban Research Course

Conflict in Postwar American Politics, 1945-1960

American History Honors Seminar

Philadelphia, 1682-2010. Cross listed with Sociology, History, and Urban Studies

Senior Honors Thesis Supervisor in History, Sociology, American Studies, Metropolitan Studies

DISSERTATIONS ADVISED

Oscar Oliver-Didier, ABD American Studies (B.Arch. Polytechnic Univ of Puerto Rico; M.A. Urban Design, Harvard; M.A., NYU). Primary advisor.

Colleen Dixon Tompkins, ABD History (B.A. Univ. of California, Berkeley; M.P.P. Harvard; J.D. NYU). Primary advisor.

Hadas Binyamini, ABD, History and Hebrew and Judaic Studies, NYU (B.A. Oberlin, M.L.I.S. Toronto). Committee member.

Anisa Jackson, ABD American Studies, NYU (B.A. University of Washington, Seattle). Committee member.

Micah Blaichman, ABD, History, NYU (A.B. Columbia, M.A. CUNY). Committee member.

Clare Richfield, Ph.D History, NYU, 2025. "The Politics of PTSD: Mental Health–Based Activism in the Anti-Vietnam War Movement." Committee member.

Kevin Myers Slack, Ph.D. History, NYU, 2024. "The Crisis of Westchester Progressivism and the Long Roots of Suburban Inequality,1898-1973." Primary advisor.

Emma Maniere, Ph.D. History, NYU 2024. Project Manager, New York City Department of Transportation. "Claiming Suburban Space: Race and Sexuality in Metropolitan Detroit, 1960-2000." Primary advisor.

Matthew Wolfe, Ph.D. Sociology, NYU, 2023. New America National Fellow. "Marketing the Missing: Missing Persons and the Competition for Concern." Committee member.

Daniel Cumming, Ph.D. History, NYU, 2021. Postdoctoral Fellow, Queens College CUNY. "Health is Wealth: The Rise of a Medical Metropolis and the Remaking of Racial Inequality in Twentieth-Century Baltimore." Committee member.

Jackson Smith, Ph.D. American Studies, NYU, 2020. Visiting Assistant Professor, University of Oregon. "Dirty Money and Disorderly Homes: Civil Forfeiture, Vice Police, and Illicit Capital in Philadelphia." Committee member

Daniel Wortel-London, Ph.D. History, NYU, 2020. Visiting Assistant Professor, Bard College. "Indebted to Growth: Real Estate and the Political Economy of Public Finance in New York City, 1871-1943." Committee member.

Christopher Cimaglio, Ph.D. Communications, Penn, 2018. Assistant Professor of Communications, Denison University. "Contested Majority: The Representation of the White Working Class in US Politics from the 1930s to the 1990s." Committee member.

Julie Davidow, Ph.D. History, Penn, 2017. Media and Communications, ACLU of Washington. "'Citizens in the Making:' Black Philadelphians, The Republican Party, and Urban Reform, 1885-1913." Committee member.

Anthony Pratcher, Ph.D. History, Penn, 2017. Assistant Professor of Ethnic Studies, Northern Arizona University. "Community Consumed: Sunbelt Capitalism, Community Control, and the (Dis)integration of Civic Life in Maryvale, Arizona." Committee member.

Adam Goodman, Ph.D. History, Penn, 2015. Associate Professor of History and Latin American and Latino Studies, University of Illinois, Chicago. "Mexican Migrants and the Rise of the Deportation Regime, 1942-2014." Primary advisor.

Sean Dempsey, Ph.D. History, Penn, 2015. Associate Professor of History and Chair, History Department, Loyola Marymount University, Los Angeles. "The Politics of Dignity: Social Christianity and the Making of Global Los Angeles." Primary advisor.

Rachel Guberman, Ph.D. History, Penn, 2015. Digital Humanist, Harvard University. "The Real Silent Majority: Denver and the Realignment of American Politics After the Sixties." Primary advisor.

Peter Pihos, Ph.D. History, Penn, 2015. Associate Professor of History and Dean, Fairhaven College, Western Washington University. "The Police, Law and Politics in Twentieth- Century Chicago."

Robert Goldberg, Ph.D. History, Penn, 2015. Head of History, Germantown Friends School, Philadelphia. "Children's Toys, Social Change, and the Business of Culture in the U.S. during the 1960s and 1970s." Committee member.

Julia Gunn, Ph.D. History, Penn, 2014. Research Ethics and Integrity Manager, Routledge, Taylor & Francis. "A Good Place to Make Money': Business, Labor, and Civil Rights in Twentieth Century Charlotte, North Carolina." Primary advisor.

Anne Fleming, Ph.D. History, Penn, 2014. Professor of Law, Georgetown University. Deceased. "City of Debtors: Law, Loan Sharks and the Shadow Economy of Urban Poverty, 1900-1970." Committee member.

Clemmie L. Harris, Jr., Ph.D. History, Penn, 2013. Associate Professor of History and Public Affairs and Director of Africana Studies, Utica University. "Race, Leadership, and the Local Machine: The African American Struggle for Political Recognition and the Politics of Community Control in Philadelphia, 1915 to 1968." Primary advisor.

Merlin Chowkwanyun, Ph.D. History, Penn, 2013. Gemson Associate Professor of Sociomedical Science, Columbia University. "The Dilemmas of Community Health, 1945-2000." Primary advisor.

Jessica Lautin, Ph.D. History, Penn, 2012. Director of Content Strategy, G&A Design, New York. "Elite and the Street: Black Class and Culture in Post-World War Two Philadelphia." Primary advisor.

Karen Tani, J.D./Ph.D. History, Penn, 2011. Seaman Family University Professor, University of Pennsylvania. "Securing a Right to Welfare: Public Assistance Administration and the Rule of Law, 1938-1960." Primary advisor.

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Anne Fleming, Ph.D. History, Penn, 2014. Professor of Law, Georgetown University. Deceased. "City of Debtors: Law, Loan Sharks and the Shadow Economy of Urban Poverty, 1900-1970." Committee member.

Erika Kitzmiller, Ph.D./Ed.D. History and Education, Penn, 2012. Research Associate Professor of Education, University of Chicago. "The Roots of Educational Inequality: Germantown High School, 1907-2011." Committee member.

Gretchen Aguiar, Ph.D. History, Penn, 2012. Education Department, LaGuardia-Wagner Archives, New York. "Head Start: A History of Implementation." Committee member.

Daniel Amsterdam, Ph.D. History, Penn, 2010. Associate Professor of History, Georgia Tech. "The Roaring Metropolis: Business, Civic Welfare, and Statebuilding in 1920s America." Committee member.

Erin Park Cohn, Ph.D. History, Penn, 2010. Director, Wurtele Center for Leadership, Smith College. "Art Fronts: Visual Culture and Race Politics in the Mid-Twentieth Century." Committee member.

Daniel Stedman Jones, Ph.D. History, Penn, 2010. Barrister, 39 Essex Chambers, London, United Kingdom. "Distilling Their Frenzy: The Origins and Development of Transatlantic Neoliberal Politics." Committee member.

Julia Rabig, Ph.D. History, Penn, 2009. Associate Professor of History, Dartmouth College. "Broken Deal: Devolution, Development, and Civil Society in Newark, New Jersey: 1960-1996." Primary advisor.

Leah Gordon, Ph.D./Ed.D, History and Education, Penn, 2008. Harry S. Levitan Director of Education and Associate Professor of Education, Brandeis University, "The Question of Prejudice: Social Science, Education, and the Struggle to Define the Race Problem in Mid-Century America, 1935-1965." Committee member.

Rene Luis Alvarez, Ph.D. History, Penn, 2008. Clinical Associate Professor of History, Arrupe College, Loyola University of Chicago. "Minority Education in the Urban Midwest: Culture, Identity, and Mexican Americans in Chicago, 1910-1977." Committee member.

Nicole Maurantonio, Ph.D. History and Communications, Penn, 2007. Professor of Rhetoric and Communications, University of Richmond. "Crisis, Race, and Journalistic Authority in Postwar Philadelphia." Primary advisor.

Christina Collins, Ph.D/Ed.D. History and Education, Penn, 2006. Director of Education Policy, United Federation of Teachers. "'Ethnically Qualified: A History of New York City Public School Teachers, 1920-1980." Committee member.

Mirella Landriscina, Ph.D. Sociology, Penn, 2005. Professor of Sociology, St. Joseph University. "Claim-Makers and Actors: Advocacy for Homeless People in Philadelphia, 1981-2003." Committee member.

Ann N. Greene, Ph.D. History, Penn, 2004. Director of Undergraduate Programs, History and Sociology of Science, University of Pennsylvania. "Harnessing Power: Industrializing the Horse in Nineteenth-Century America." Primary advisor.

Christopher Klemek, Ph.D. History, Penn, 2004. Associate Professor of History, George Washington University. "Urbanism as Reform: Modernist Planning and the Crisis of Urban Liberalism in Europe and North America, 1945-1975." Committee member.

Robert Natalini, Ph.D. History, Penn, 2004. Attorney and Lecturer in History, University of Pennsylvania. "Chi lascia la via vecchia: Law, Ethnicity, and the Immigration Experience, Italians in Industrial America, 1890-1925." Committee member.

Deirdre Sullivan, Ph.D. History, Penn, 2003. Chair of Social Studies Department, Bellarmine College Prep School, San Jose, California. "Letting Down the Bars: Race, Space, and Democracy in San Francisco, 1936-1964." Primary advisor.

Francis Ryan, Ph.D. History, Penn, 2003. Director of the Masters of Labor and Employment Relations Program and Associate Teaching Professor, Rutgers University. "Everyone Royalty: AFSCME, Municipal Workers, and Urban Power in Philadelphia, 1921-83." Committee member.

Jordan Stanger-Ross, Ph.D. History, Penn, 2003. Professor of History, University of Victoria. "The Choreography of Community: Italian Ethnicity in Postwar Toronto and Philadelphia." Committee member.

Lorrin Thomas, Ph.D. History, Penn, 2003. Associate Professor of History, Rutgers University, Camden. "Citizens on the Margins: Puerto Rican Migrants in New York City, 1917-60." Committee member.

Mark Wilkens, Ph.D. History, Penn, 2003. Faculty, Parkway West High School, Philadelphia. Making the City Work: Municipal Employees and their Managers in New York and Philadelphia, 1880-1940." Committee member.

Peter Siskind, Ph.D. History, Penn, 2002. Vice Provost and Professor of History, Arcadia University. "Growth and its Discontents: Localism, Protest, and the Politics of Development on the Postwar Northeast Corridor." Primary advisor.

Margaret Pugh O'Mara, Ph.D. History, Penn, 2002. Howard and Frances Keller Professor of History, University of Washington, Seattle. "Cities of Knowledge: Cold War Politics, Universities, and the Roots of the Information Age Metropolis, 1945-70." Committee member.

Luther Adams-Free Man of Color, Ph.D. History, Penn, 2002. Associate Professor of Ethnic, Gender, and Labor Studies, University of Washington, Tacoma. "Way Up North in Louisville: African American Migration in Louisville, Kentucky, 1930-70." Committee member.

Jinbin Park, Ph.D. History, Penn, 2002. Professor of History, Kyung Hee University, Seoul, South Korea. "The Legacy of Conservative Reform: Making the First Public Housing in Philadelphia, 1890-1940." Committee member.

Minna Ziskind, Ph.D. History, Penn, 2002. History Faculty, Barrack Hebrew Academy, Bryn Mawr, PA. "Citizenship, Consumerism, and Gender: A Study of District 65, 1945-60." Committee member.

Janine Denomme, Ph.D. American Civilization, Penn, 2001."To End This Day of Strife": Churchwomen and the Campaign for Integration, 1920-1970." Deceased. Primary advisor.

Mark Santow, Ph.D. History, Penn, 2001. Associate Professor of History, University of Massachusetts, Dartmouth. "Saul Alinsky and the Dilemmas of Race in the Postwar City." Committee member.

Amy Hillier, Ph.D. Social Welfare, Penn, 2001. Associate Professor of City and Regional Planning and Social Policy and Practice, University of Pennsylvania. "Redlining and the Home Owners' Loan Corporation." Committee member.

Maribeth DeLorenzo, Ph.D. Social Welfare, Penn, 2001. Deputy Director, Urban Sustainability Administration, U.S. Department of Energy & Environment (DOEE), Washington, DC. "American Dreams: Latino Immigrants' Homeownership Experiences in the Nation's Capital." Committee member.

Stephanie Dyer, Ph.D. History, Penn, 2001. Professor of History and Political Economy, Sonoma State University. "Consumer City: Shopping Centers and Community in the Philadelphia Region, 1920s-90s." Committee member.

Allison Baker, Ph.D. History, Penn, 2000. Professor of History, Santa Rosa College. "The Lakewood Story: Defending the Recreational Good Life in Postwar Southern California Suburbia, 1950-99." Committee member.

Bruce Lenthall, Ph.D. American Civilization, Penn, 1999. Executive Director, Center for Teaching and Learning, University of Pennsylvania. "Radio's America: The Great Depression and the Rise of Modern Mass Culture." Committee member.

Erik Rau, Ph.D. History and Sociology of Science, Penn, 1999. Director of Library Services, Hagley Museum and Library. "Combat Scientists: The Emergence of Operations Research in the United States." Committee member.

Rhonda Y. Williams, Ph.D. History, Penn, 1998. Coleman A. Young Endowed Chair and Professor of African American Studies, Wayne State University. "'Living Just Enough for the City': Change and Activism in Baltimore's Public Housing, 1940-80." Committee member.

Robert M. Zecker, Ph.D. American Civilization, Penn, 1998. Professor of History, St. Francis Xavier University, Nova Scotia. "'All Our Own Kind Here': The Creation of a Slovak-American Community in Philadelphia, 1890-1945." Committee member.

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Wendell Pritchett, Ph.D. History, Penn, 1997. Presidential Professor of Law and Education, University of Pennsylvania. "From One Ghetto to Another: Blacks, Jews, and Public Housing in Brownsville, Brooklyn, 1945-70." Committee member.

Alison Isenberg, Ph.D. History, Penn, 1995. Professor of History, Princeton University. "Downtown Democracy: Rebuilding Main Street Ideals in the 20th-Century American City." Committee member.

EXTERNAL EXAMINER/READER

Miguel Giron, ABD History, Northwestern University.

Sarah Coffman, ABD History, Rutgers University.

Marion Marchet, Ph.D. American Civilization, Sorbonne Université, Paris. 2023.

Mo Torres, Ph.D. Sociology, Harvard University, 2023. University of Michigan Society of Fellows.

François-René Julliard, Ph.D. History, Université de Clermont Auvergne, 2022.

Bobby Cervantes, Ph.D. American Studies, University of Kansas, Junior Fellow, Harvard Society of Fellows (Cervantes's Mentor, Jefferson National Fellowship Program 2021-23).

Joseph Rulon Stuart, Ph.D. History, University of Utah, 2021. Assistant Professor of History, Brigham Young University.

Stephen Koeth, Ph.D. History, Columbia University, 2020. Assistant Professor of History, University of Notre Dame.

Alexis Mann, Ph.D. Social Policy and Sociology, Brandeis University, 2018. Northbound Research and Consulting and Visiting Research Scholar, Brandeis University.

Michael Savage, Ph.D. History, University of Toronto, 2018. Postdoctoral Fellow, Cal Tech.

Caroline Rolland-Diamond, Habilitation, History, Ecole des Hautes Etudes en Sciences Sociales, 2015. President and Professor of the History of the United States, Université Paris Nanterre.

Elsa Devienne, Ph.D. History, Ecole des Hautes Etudes en Sciences Sociales, 2014. Senior Lecturer in U.S. History, Northumbria University.

Dov Wynrib Grohsgal, Ph.D. History, Princeton University, 2013. Associate Research Scholar, Obama Presidency Oral History Project, Columbia University.

Andrew Diamond, Habilitation, Politics, Sciences Po, Paris, 2012. Professor of American Civilization, Sorbonne Université, Paris.

Tula Connell, Ph.D. History, Georgetown University, 2011. Senior Communications Officer, Solidarity Center, Washington, DC.

Suleiman Osman, Ph.D. American Civilization, Harvard University, 2006. Associate Professor of American Studies, George Washington University. (Osman's Mentor for Miller Center National Fellowship Program, University of Virginia, 2002-03).

Khalil G. Muhammad, Ph.D. History, Rutgers University, 2004. Professor of African American Studies and Public Affairs, Princeton University.

Anthony Chen, Ph.D. Sociology, University of California, Berkeley, 2002. Associate Professor of Sociology, Northwestern University. (Chen's Mentor for Miller Center National Fellowship Program, University of Virginia, 2001-02).

Daniel Gitterman, Ph.D. Political Science, Brown University, 1999. McRae Professor of Public Policy, University of North Carolina, Chapel Hill.

UNIVERSITY SERVICE: NYU (2015-)

Current and Ongoing

Faculty of Arts and Science Promotion and Tenure Committee (2022-23, 2024-)

Provost's Urban Initiative (2017-): Co-Chair (2018-21); Undergraduate Curriculum Committee (2017-)

Past Service

NYU Middle Atlantic States Accreditation, Self-Study, Impact Working Group (2022-23)

Director, NYU Cities Collaborative-Mellon Summer Institutes on Urbanism (2022, 2023)

Chair, Urban Public Humanities Graduate Summer Fellowship Selection Committee (2021-23)

Chair, Mellon-Undergraduate Urban Humanities Research Fellowship Selection Committee (2020-23)

Chair, Urban Studies Undergraduate Degree Planning Committee (2019-24)

Provost's Academic Advisory Committee (2019-22)

Co-Director, Urban Fellows Program (2019-20)

FAS Dean's Committee on Tenure Policy (2017-18)

Faculty Advisory Committee, Urban Democracy Lab (2017-21)

Faculty Advisory Committee, NYU Urban Initiative (2017-21)

Co-Chair, Marron Institute for Urban Management, Advisory Board (2016-21), Member (2015-16).

Faculty Advisory Board, Institute for Public Knowledge (2015-19)

Dean's Committee to Evaluate the Draper Program (2015-16)

Faculty Search Committee, Mellon Urban Humanities Initiative (2015-16)

Department Service—New York University

By-Laws Committee, Social and Cultural Analysis (2025-26)

Planning and Advisory Committee, History Department (2025)

Strategic Plan Committee, Social and Cultural Analysis (2024-25)

Promotion, Tenure, and Reappointment Committees (chair for six cases): Social and Cultural Analysis (2016-17, 2017, 2018, 2019, 2020, 2022); History (2015, 2017, 2024); Environmental Studies (2025).

Undergraduate Curriculum Committee, Social and Cultural Analysis (2016-18, 2019-20, 2022-23, 2024)

Field Coordinator for U.S. History (2020-21).

Salary and Merit Review Committee, Social and Cultural Analysis: Chair (2020, 2022, 2023), Member (2016, 2017, 2018)

Co-Chair, U.S. History Graduate Admissions Committee, Department of History (2022-23)

Search Committees: Social and Cultural Analysis Target of Opportunity Hires (2015-16); Organizer, Race and Cities in the Americas Cluster Hire (2021-22).

Fellowships and Prize Committee, Department of History (2020-21)

Thomas J. Sugrue   **Page 35**

Social and Cultural Analysis Book Series Advisory Committee (2018-)

University of Pennsylvania (1991-2015)

Graduate Group in History: Chair (2000-02, 2003-05); Associate Chair (1999-2000); Executive Committee (1994-95, 1996-98, 1999-2000, 2009-10, 2011-12).

Graduate Advisory Group, Program in Africana Studies (2006-14).

Graduate Group in City Planning (2005-15).

Graduate Group in History and Sociology of Science (2001-15).

Graduate Group on Social Welfare, School of Social Policy and Practice (1998-2008).

Graduate Group in Sociology (1997-2015)

Graduate Group in History (1992-2015)

Urban Studies Graduate Certificate Program Steering Committee (1993-2015).

University Committee Service

Dean's Strategic Plan Committee, School of Arts and Sciences (2013-14).

Committee on Access and Equity, Penn's 2014 Middle Atlantic States Accreditation (2012-13).

Executive Committee, Penn Digital Humanities Forum (2012-13).

Executive Council, Penn Institute for Urban Research (2011-15).

Senate Ad Hoc Committee on Faculty and the Academic Mission (2010-11).

Integrated Studies Planning Committee (2009-11).

Advisory Board, Penn Program on Democracy, Citizenship, and Constitutionalism (2006-07).

Provost's Committee for the Selection of the Nussdorf Chair in Urbanism (2006).

Penn Institute for Urban Research, Faculty Affiliate (2004-15).

Chair, University Committee on Manufacturer Responsibility (2001-02).

Faculty Liaison to the Trustees' Committee on Academic Policy (2001-02).

Provost's Strategic Planning Committee on the Urban Community (2001-02).

Washington Semester Program, Associate Director Evaluation Committee (2001).

SAS Faculty Research Fellowships Selection Committee (2001).

Planning Committee, Legal History Consortium Conferences (2002, 2005, 2008).

Greenfield Intercultural Center, Board of Advisors (2000-10).

Dean's Committee on Service Based Learning (2000-02).

Faculty Advisory Committee, Urban Studies Program (2000-15).

Harry S Truman Scholarship Nomination Committee (2000-01, 1997-98).

Faculty Advisory Committee, Fels Center of Government (1999-2002).

Faculty Advisory Committee, Netter Center for Community Partnerships (1998-2008).

Thomas J. Sugrue Page 36

Urban Education Minor Committee, School of Arts and Sciences (1998).

Curriculum Committee, School of Arts and Sciences (1997-98).

Elector and Historian, Phi Beta Kappa (1997-99).

Advisory Committee, Saul Steinberg Lecture Series (1997-98).

Faculty Senate Nominating Committee (1997-98).

Advisory Committee, Sawyer Seminar on Race, Inequality, and Globalization (1997-98).

Co-Convener, Seminar on American Political Development (1995-96).

Committee on Undergraduate Academic Standing (1993-94).

Co-Convener, Mellon Program for Assessing and Revitalizing the Social Sciences, Seminar on Work and Welfare (1992-94).

College of Arts and Sciences, Freshman Advisor (1996-98, 1992-95).

University Senate, Executive Committee: Junior Faculty Representative (1992-94).

Department Service

Executive Committee, History Department (2009-11, 2003-05, 1999-2002, 1997-98, 1992-94).

Chair, Diversity Committee, History Department (2011-13).

Search Committees: Chair, African American History Target of Opportunity (2010); Chair, 20th Century U.S. History (2009); U.S. History Megasearch—four hires (2000-02); U.S. Women's and Gender History (2000); Chair, Asian American History (1999-2000); American Colonial History (1997-98); American and Comparative Jewish History (1996).

Department Promotion, Tenure, and Reappointment Committees, chair of four committees (2001-02, 2003-04, 2006, 2010, 2011-12, 2012-13.

Ten-Year External Review Committee, History (2003-04).

Co-Convenor, Legal History Consortium (2001-12).

Undergraduate Committee (1992-94).

Thomas Cochran Prize Committee (2000, 1997, 1995, 1994, 1993, 1992).

FOUNDATION AND PROFESSIONAL BOARDS AND COMMISSIONS

Russell Sage Foundation, Board of Trustees (2021-)
    Nominations Committee (2022-)
    Visiting Scholars Selection Committee (2021-)
    Conflict of Interest Committee (2021-23)
    Editorial Board, *RSF Journal of the Social Sciences* (2021-)

CIFAR: Canadian Institute for Advanced Research, Research Council (2019-)
    Research Council (2019-)
    Chair, Advisory Committee, Humanity's Urban Future Program (2023-)
    Selection Committee, Azrieli Global Scholars Program (2024)

American Academy of Political and Social Science
    Editorial Advisory Committee, *Annals* (2014-)

Podcast Advisory Committee (2020-22)

Gilder-Lehrman Institute
Scholarly Advisory Committee (2020-)

Global Urban History Project
International Advisory Council (2018-)

Social Science History Association, President (2013-14)
Vice President (2012-13)
Executive Committee (2014-16, 2008-11)
Development Committee (2016-18)
Co-Chair, Program Committee (1997-98)
President's Book Award Committee (1997)

Urban History Association, President (2013-14)
Executive Committee (2011-2016)
Chair, Nominating Committee (2016)
Chair, Development Committee (2014-15)
Board of Directors (2013-16, 2000-03)
Program Committee (2011-12, 2002-04)
Book Award Committee (1998)

American Historical Association
Council, Research Division, elected member (2010-13)
Marketing Committee (2011-13)
American Historical Review Publisher Selection Committee (2011)

Organization of American Historians
Chair, Nominating Board (2012-13), elected member (2010-13)
Japanese Association of American Studies/OAH Collaborative Committee (2008-13)
OAH Distinguished Lecturer (2002-)
Program Committee, 2003 Annual Meeting (2001-03)
Merle Curti Prize Committee (2000-02)

Preservation Alliance for Greater Philadelphia, Board of Directors (2009-14)
Executive Director Search Committee (2012)

Bread and Roses Community Fund, Philadelphia, Board Co-Chair (2006-12)
Board of Directors (2004-12)
Development Committee (2007-12)
Co-Chair, Executive Director Search Committee (2006)

City of Philadelphia Historical Commission, Vice Chair (2002-08)
Commissioner, mayoral appointee (2001-08)
Chair, Historical Designation Committee (2001-08)

Historical Society of Pennsylvania, Board of Councilors (2000-12)
Vice Chair and Chair of Library Committee (2004-08)
Ad-Hoc Budget Committee (2004)
Institutional Advancement Committee (2002-04)
Publications Committee (2002-12)
Education and Interpretation Committee (2002-04)

West Mount Airy Neighbors, Philadelphia, President (1996-98)
Board of Directors (1994-2001)

Thomas J. Sugrue   Page 38

EDITORIAL BOARDS

RSF: The Russell Sage Foundation Journal of the Social Sciences (2021-)

Annals of the American Academy of Political and Social Science (2014-)

Revue française d'études américaines, Conseil Scientifique (2010-)

Oxford Studies in Postwar American Political Development, Oxford University Press (2007-)

African American Life series, Wayne State University Press (2004-)

Politics and Culture in Modern America Series, University of Pennsylvania Press (2002-)

Past Editorial Board Service

Journal of Urban History (2013-2022)

Public Books (2014-2016)

Pennsylvania History (2013-2015)

Journal of Policy History (2006-2012)

Pennsylvania Magazine of History and Biography (2003-2009)

PROFESSIONAL COMMITTEES, ADVISORY GROUPS, CONSULTING

Advisor, Black Land Loss Narrative Archive Project, Stanford University (2025-)

Advisor for U.S. History, John Simon Guggenheim Memorial Foundation Fellowships (2021-2023)

Faculty Mentor, University of Virginia, Jefferson National Fellows Program (2021-2023)

Consultant, Elias Law Group (2022, 2023, 2025)

Fellowship Selection Committee, New-York Historical Society (2019)

Steering Committee, University of Michigan, Center for Social Solutions (2018-)

External Review Committee, CUNY Graduate Center Program in History (2018)

National Affiliate, University of Chicago, Race and Capitalism Project (2016-)

Advisory Board, University of California, Davis, Center for Engaged Scholarship (2015-)

External Review Committee, San Diego State University, Department of History (2015)

Advisory Board, American University, Metropolitan Policy Center (2014-)

Co-Director, Institut de France, City/*Cité:* Transnational Urban Initiative (2014-18)

Advisory Board, Andrew W. Mellon Foundation, Diversity: Our Compelling Interest (2014-18)

External Advisory Board, New York University, Marron Institute (2014-15)

External Review Committee, City University of New York, Queens College, Urban Studies (2012)

Advisory Board, Center on Policy Initiatives, Cry Wolf Project (2010-12)

John Reps Prize Committee, Society of American City and Regional Planning History (2009)

World Economic Forum, Global Agenda Council on Human Equality and Respect (2008-09)

Urban and Metropolitan Policy Advisory Committee, Barack Obama for President (2008)

Thomas J. Sugrue   **Page 39**

Ellis Hawley Prize Committee, Policy History Association (2005-06)

Faculty Mentor, University of Virginia, Miller Center for Public Affairs (2005-06, 2003-04, 2000-01)

Member, American Political History Initiative (2002-06)

Advisor, New School/MacArthur Foundation Project on the 2000 Census (2002)

Consultant, Cendant International Training Program (2002)

Local Arrangements Committee, Society for American City and Regional Planning History (2000-01)

Visiting Committee, New School, Graduate Faculty, Committee on Historical Studies (1999)

National Steering Committee: Scholars, Artists, and Writers for Social Justice (1997-98)

Advisory Board: Philadelphia University-Community Collaborative, Temple University/William Penn Foundation (1996-2000)

Steering Committee: National Teach-In with the Labor Movement, Columbia Univ. (1996)

Member: Twentieth Century Fund Working Group on the Future of Liberalism (1995-96)

Consultant: Institute for Economic Culture, Boston University (1993)

Member: Wolfson Center on American Affairs, Domestic Policy Working Group (1991)

Organizer: District Council 35, International Brotherhood of Painters and Allied Trades, Boston (1988)

OTHER PROFESSIONAL ACTIVITIES

Documentary Film Appearances

Great Migrations: A People on the Move, Episodes 2 and 3 (2025), Blackside/PBS

Gradually, Then Suddenly: The Detroit Bankruptcy (2023), History Making Productions

Driving While Black (2020), Steeplechase Films/PBS

Jackie Kennedy: Fighting for Civil Rights (2018), AB Production, France

Detroit 48202: Conversations along a Postal Route (2018), Grito Films

Urban Trinity: Catholic Philadelphia (2015), History Making Productions

Philadelphia: The Great Experiment: 3: Promise for a Better City (2013), History Making Productions

Jim Crow Pennsylvania (2007), WQED-TV

Viva Glas Vegas (2006), BBC Scotland Frontline

The Guilty Men: A Historical Appraisal, History Channel (2004)

A City on Fire: The Story of the 1968 Detroit Tigers (2002), HBO

Rizzo (2000), WHYY-TV/PBS Philadelphia

Urban Affairs Forum (1996), Connecticut Public Television

Films and Media Production: Editorial, Advising

Advisor, *Eyes on the Prize III: We Who Believe in Freedom* (2025), HBO, Trilogy Films and Anonymous Content

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Associate Producer and Chief Historical Advisor, *Gradually, Then Suddenly: The Detroit Bankruptcy* (2022), History Making Productions

Dramaturge, *I'm Your Woman* (2020), Amazon Films

Historical Advisor, *Driving While Black* (2020), Steeplechase Films

Advisory Board, American Girl/Mattel, "Melody," 2016 American Girl Doll Project (2014-16)

Museums, Public History, and Arts Projects

Scholarly Advisory Committee, Black Land Loss Archive Project (2025-)

Consultant, Unvarnished Consortium, History of Segregation in the North Project, https://www.unvarnishedhistory.org/about/credits/ (2021-22)

Scholars Advisory Group, Civil Rights Foundation, New York, Museum of Civil Rights, Civil Rights Foundation (2021)

Advisor, American Association for State and Local History, US at 250 Project (2020-21)

Advisory Board, University of Michigan, Institute for Research on Labor, Employment, and the Economy, Detroit Chene Street History Project (2014-18)

Advisory Board, Montclair Historical Society, Black YWCA Project (2012)

Consultant, City of Philadelphia Mural Arts Project (2017, 2010)

Consultant, First Person Arts Project/First Person Museum, Philadelphia (2010-11)

Advisory Board, History Making Productions, LLC. (2009-)

Advisory Board, Chicago Architectural Foundation, The Architecture of Segregation (2008)

Advisory Board, Central Philadelphia Development Corp, 50th Anniversary Documentary (2005-06)

Consultant, Pew Charitable Trusts, Philadelphia Heritage Initiative (2004)

Advisor, Ford Foundation/Rutgers University, Invincible Cities Project, Camden, NJ and Richmond, CA, (2003-08)

Advisor, Michigan State University/Detroit Public TV, *American Black Journal* project (2003-05)

Advisor, Charles Wright Museum of African-American History, Detroit, core exhibit: "And Still We Rise: Our Journey through African American History and Culture" (2003)

Advisory Board, New Jersey Historical Society Project on 1960s Urban Uprisings (2001-07)

Advisory Board, Henry Ford Museum/University of Michigan Automotive Heritage Project (2001-05)

Advisory Committee: Pennsylvania Humanities Council, Program on the 1950s (1997)

REVIEWER/REFEREE/EXTERNAL EXAMINER

External Ph.D. Examiner

Sorbonne Université, American Civilization (2023); Harvard University, Sociology Department (2023); Université Clermont Ferrand, History (2022); University of Utah, History Department (2021); Columbia University, History Department (2020); Harvard University, Sociology Department (2019); Brandeis University, Sociology (2018); University of Toronto, History Department (2018); University of Pennsylvania, History Department (2018, 2017); Ecole des Hautes Etudes en Sciences Sociales (2014, 2015); Princeton University, History Department (2013);

Institut d'Études Politiques de Paris/Sciences Po (2012); Georgetown University, History Department (2011); Rutgers University, History Department (2004); Brown University, Political Science Department (1999).

External Tenure and Promotion Reviews: 159 since 1998

History (124), Law (8), Political Science (5), Sociology (4), American Studies (4), African American Studies (4), Labor and Industrial Relations (2), Art and Architectural History (2), City Planning (3), Anthropology (1), English (1), Library Science (1).

Reviewer/Referee

Routledge Press (2025); Irish Research Council (2023); Russell Sage Foundation (2021-; 1998-99); Radcliffe Institute for Advanced Study (2017-22 2005-15); *American Historical Review* (2021, 2012, 2008); *The Sixties Journal* (2021); University of Illinois Press (2021, 2020); Cornell University Press (2018, 2008, 2000, 1996); MacArthur Foundation (2016, 2005, 2000); Center for Engaged Scholarship, UC Davis (2016); University of California Press (2016, 2013, 1995); Princeton University Press (2015, 2014, 2002, 1998, 1996); Palgrave/St. Martin (2015); *Pennsylvania Magazine of History and Biography* (2010, 2009, 2008, 2007, 2005, 2004, 1993, 1992); University of Chicago Press (2009, 1999); *Journal of American History* (2007, 2005, 2004, 2003, 2000, 1999); Univ. of Pennsylvania Press (2004-); Balch Fellowship, Historical Society of Pennsylvania (2005-12); *Journal of Southern History* (2007); Wayne State University Press (2007); *Social Science History* (2004); W.W. Norton (2003, 1999); Bedford Books (2003); *Journal of Urban History* (2001, 1999); *Urban Studies* (1999); Harvard Univ. Press (1998); Blackwell Publishers (1998, 1997); National Endowment for the Humanities (1997); *Theory and Society* (1997); Penn State Univ. Press (1997); *Journal of American Ethnic History* (1996); *Political Power and Social Theory* (1996); *Urban Affairs Review* (1995); *Urban Affairs Quarterly* (1994); University of North Carolina Press (1994); Duke University Press (1994); Oxford Univ. Press (1993); DC Heath and Company (1993, 1994); University of Pittsburgh Press (1991).

MEDIA APPEARANCES

Magazines (Print and Online)

New York Times Magazine; Economist; Foreign Policy; The Atlantic; Salon; Slate; Time; The Nation; Newsweek; U.S News and World Report; The New Republic; American Prospect; L'Express (Paris); *Metropolis; Weekendavisen* (Denmark); *Philadelphia Magazine; L'Espresso* (Rome); *The Root; Lingua Franca; Vox; The Deal.com; Ebony; Forbes; Vice; American Banker; Time Weekly* (China)

Newspapers (Print and Online): *New York Times; Washington Post; Toronto Globe and Mail; Wall Street Journal; Financial Times; The Guardian; Smithsonian Magazine; The Independent* (London); *Times Higher Education Supplement; USA Today; Bloomberg News; Christian Science Monitor; National Catholic Reporter; Chronicle of Higher Education; Automotive News; Daily Beast; Talking Points Memo; Argus* (Cape Town, South Africa); *Daily Mail* (London); *Le Nouvel Observateur (L'Obs); Le Monde; Libération; AOC: Analyse, Opinion, Critique; France Ouest; Die Welt; L'Echo* (Brussels); *Die Zeit; Daily Yoimiuri* (Tokyo); *Daily News* (Nigeria); *Publica* (Lisbon); *Linkiesta* (Rome); *Telam* (Buenos Aires); *Arizona Republic; Austin Herald-Statesman; Boston Globe; Boston Herald; Baltimore Sun; Chestnut Hill Local; Chicago Sun-Times; Chicago Tribune; City Paper* (Philadelphia); *Contra Costa Times; Courier-News* (Cherry Hill, NJ); *Dallas Morning News; Deadline Detroit; Detroit Free Press; Detroit News; Detroit Sunday Journal; Emporia Bulletin; Grand Rapids Press; Houston Chronicle; Jewish Exponent* (Phila.); *Kansas City Star; Los Angeles Times; M Live* (Michigan); *Metro Times* (Detroit); *Michigan Chronicle; Michigan Lawyer; Michigan Citizen; Mobile Register; Mount Airy Times-Express; Newark Star-Ledger; Newhouse News Service; Newsday; Newsworks WHYY; Observer-Eccentric Newspapers; Philadelphia Daily News; Philadelphia Inquirer; Philadelphia Metro; Philadelphia Tribune; Pittsburgh Post-Gazette; Princeton Packet; San Francisco Chronicle; Sioux Falls Argus-Leader; Tulsa News.*

Television: MSNBC; National Geographic Channel; CBS News; PBS; WHBH-TV (Boston); WHYY-TV (Philadelphia); KYW-TV (Philadelphia); WTXF-TV (Philadelphia); WPHL-TV (Philadelphia); WCAU-TV (Philadelphia); Canadian Broadcasting Corporation (CBC Evening News); Shanghai TV (China); France 24; TV Asahi (Japan); Al Jazeera English; KPIX-TV (San Francisco); WHDH-TV (Boston); Shaw Cablesystems (Vancouver, British Columbia, Studio 4);

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The History Channel (Movies in Time); C-SPAN (Public Affairs Forum; Bancroft Prize Address; Book TV); Virginia Public TV (Miller Center Forum).

Radio and Podcasts: National Public Radio (News and Notes); Public Radio International; AP Radio, CBC Radio; Wisconsin Public Radio (Ideas; To the Best of Our Knowledge); Michigan Public Radio (Jack Lessenberry Show); Detroit Public Radio; Pacifica Radio; American Public Media (Weekend America); Bloomberg Radio (Simply Put and The World in Time with Lewis Lapham); Sirius Satellite Radio (POTUS; Channel 110, Blog Bunker; Channel 146, Keep It Real with Mark Thompson); WBAI Radio (New York); WNYC Radio, New York (News and Leonard Lopate Show); WUMB (Boston); WBNW (Needham, MA); KFNX (Phoenix); KDVS Radio (Davis, CA); KUSF Radio (San Francisco); WILS (Lansing); WBEZ Radio (Chicago); WDET Radio (Detroit); WJR Radio (Detroit); WCHB Radio (Detroit); WILL Radio (Urbana); WQBH Radio (Detroit); WLVQ Radio (Detroit); WCBN Radio (Ann Arbor); WRPI Radio (Albany); WHWH Radio (Princeton); WVNJ Radio (New Jersey); WHYY Radio (News and Radio Times; Philadelphia); KYW Radio (Philadelphia); WBCB Radio (Philadelphia); WRTI Radio (Philadelphia); Clear Channel Radio (Philadelphia): WURD Radio (Philadelphia); KVOE Radio (Emporia, Kansas); WBOO Radio (Portland); KTLK-FM (Minneapolis); WKSU Radio (Kent, Ohio); Unpresidented Podcast; INET Podcast.

CURRENT PROFESSIONAL MEMBERSHIPS

American Academy of Arts and Sciences (Fellow, elected 2011)

American Academy of Political and Social Science (Walter Lippmann Fellow, elected 2016)

American Historical Association

American Sociological Association

Association Française des Études Américaines

New York Institute for the Humanities (Fellow, elected 2016)

Organization of American Historians

Phi Beta Kappa

Royal Historical Society, U.K. (Fellow, elected 2017)

Social Science History Association (past president)

Society of American City and Regional Planning History

Society of American Historians (Fellow, elected 2009)

Urban Affairs Association

Urban History Association (Charter Member, past president)

LANGUAGES

French (advanced reading), German (basic reading), Spanish (basic reading).

Exhibit G

Rebuttal Expert Report
Thomas J. Sugrue
December 18, 2025

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

---X

Michael Williams, José Ramírez-Garofalo, Aixa Torres, and
Melissa Carty,

                          Petitioners,

                -against-

Board of Elections of the State of New York; Kristen
Zebrowski Stavisky, in her official capacity as Co-Executive
Director of the Board of Elections of the State of New York;
Raymond J. Riley, III, in his official capacity as Co-Executive
Director of the Board of Elections of the State of New York;
Peter S. Kosinski, in his official capacity as Co-Chair and
Commissioner of the Board of Elections of the State of New
York; Henry T. Berger, in his official capacity as Co-Chair
and Commissioner of the Board of Elections of the State of
New York; Anthony J. Casale, in his official capacity as
Commissioner of the Board of Elections of the State of New
York; Essma Bagnuola, in her official capacity as
Commissioner of the Board of Elections of the State of New
York; Kathy Hochul, in her official capacity as Governor of
New York; Andrea Stewart-Cousins, in her official capacity
as Senate Majority Leader and President *Pro Tempore* of the
New York State Senate; Carl E. Heastie, in his official
capacity as Speaker of the New York State Assembly; and
Letitia James, in her official capacity as Attorney General of
New York,

                          Respondents,

                -and-

Representative Nicole Malliotakis, Edward L. Lai, Joel
Medina, Solomon B. Reeves, Angela Sisto, and Faith Togba

                    Intervenor-Respondents.

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Index No. 164002/2025

**<u>Rebuttal Report of Thomas J.
Sugrue</u>**

REBUTTAL REPORT OF THOMAS J. SUGRUE

I, Thomas J. Sugrue, under the penalty of perjury, make the following declaration:

1.   I previously submitted a report in this matter on November 17, 2025 (my "Opening Report"). My conclusions in the Opening Report concern the history of racial segregation, discrimination, and disparate treatment against Blacks and Latinos on Staten Island and the significant disparities that persist today between these groups and white residents with regard to housing, education, socioeconomic status, and policing — all of which are known to have a negative impact on political participation and the ability to influence elections.[1] I have been asked to respond to certain opinions offered in the December 8, 2025 expert report of Mr. Joseph Borelli ("Borelli Report").

2.   My qualifications and compensation as outlined in my Opening Report have not changed, and I have not served as an expert in any other case or authored any publications in the interim.

3.   My work in this matter is ongoing, and I may review additional materials or conduct further analysis. I reserve the right to update, refine, or revise my opinions as set forth in this report.

4.   I conclude that Mr. Borelli's report contains errors of fact and interpretation that render many of his conclusions unreliable.

5.   Mr. Borelli makes sweeping historical claims about the lack of discrimination on Staten Island that are belied by the island's long history of public and private segregation, violations of civil rights laws, violent incidents targeting Blacks and Latinos, and disparate

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[1] Opening Report, ¶ 8. Borelli Report, esp. 9-11 and 18, discusses Asians on Staten Island, a group whose experience with discrimination and disparities is outside the scope of the conclusions of my report.

policing.

6.   Mr. Borelli's presentation of U.S. Census data confirms and reinforces my findings that there are substantial and ongoing disparities between white, Black, and Latino residents of Staten Island concerning income, educational attainment, and housing.

7.   Mr. Borelli does not provide evidence that counters my findings about residential segregation between whites, Blacks, and Latinos on Long Island.

8.   Mr. Borelli relies on only one article to reach a conclusion about federal housing programs and racial segregation that is not sustained by the substantial body of scholarship on the history of housing policy.

9.   Mr. Borelli's data on Black and Latino voter registration and voter turnout in nationwide and New York State elections offers evidence of substantial disparities in political participation between whites, Blacks, and Latinos that supports the conclusions in my Opening Report.

10.   Mr. Borelli's list of civil rights organizations, advocacy groups, and social service agencies that work to advance the interests of minorities on Staten Island emphasizes the persistence of racial and ethnic disparities affecting non-white Staten Islanders.

11.   Mr. Borelli's opinion about a lack of racial appeals in Staten Island politics is not sustained by his evidence. In fact, his own sources offer a textbook example of the use of racial appeals in the 11th Congressional District race between Nicole Malliotakis and Max Rose in 2020.

12.   Mr. Borelli's discussion of the Staten Island secession movement misrepresents my report. Evidence of racial motivations by secessionists is affirmed in a wide variety of sources that I use from historians, political scientists, legal scholars, journalists, and observers across the political spectrum.

13.   Mr. Borelli makes assertions about the relationship of education, socio-economic status, and homeownership to political participation without any citations, including the well-established scholarship by social scientists on the subject.

STATEN ISLAND'S HISTORY OF CIVIL RIGHTS

14.   Mr. Borelli disputes my analysis of the history of racial discrimination, segregation, and disparities on Staten Island, arguing that I offer "a dismal rendition of Staten Island's history."[2] He offers evidence of anti-slavery activism on the island in the early nineteenth century and highlights the role of Governor Daniel Tompkins in passing manumission legislation in 1817 and various Staten Island leaders who supported the abolition of slavery.[3] This is a laudable history, but it cannot explain how and why Staten Islanders experienced racial segregation, discrimination, socioeconomic disparities, harassment, and obstacles to political participation during the twentieth and twenty-first centuries.

15.   Consider the fate of Sandy Ground, which both Mr. Borelli and I discuss.[4] Sandy Ground was indeed a thriving community of formerly enslaved people in the nineteenth century, but by the 1930s, when the Home Owners Loan Corporation surveyed it, the neighborhood suffered from neglect and the lack of basic infrastructure,[5] and its Black children attended a segregated school.[6] Such Jim Crow schools were increasingly commonplace in twentieth century New York, despite civil rights laws dating to the nineteenth century that forbade segregated public education.[7] Sandy Ground was also stigmatized by federal housing appraisers—even nearby

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[2] Borelli Report, 4.
[3] Borelli Report, 20-23.
[4] Borelli Report, 23-24; Opening Report, ¶¶ 9, 18, 38.
[5] Opening Report, ¶ 38.
[6] Staten Island, New York, Area Description, D-21, in Robert K. Nelson, LaDale Winling et al., "Mapping Inequality: Redlining in New Deal America," in *American Panorama: An Atlas of United States History*, 2023, online at https://dsl.richmond.edu/panorama/redlining/map/NY/StatenIsland/area_descriptions/D5#loc=12/40.5741/-74.1562, cited in Opening Report, ¶ 38.
[7] Thomas J. Sugrue, *Sweet Land of Liberty: The Forgotten Struggle for Civil Rights in the North* (New York:

Rossville was rated negatively because of the presence of a small Black population.[8]

16.   As evidence of Staten Island's supposed commitment to racial justice, Mr. Borelli offers a selective list of New York state civil rights legislation from 1877 to 1968.[9] The passage of civil rights laws in New York did indeed provide citizens and activists tools to fight racial segregation, discrimination, and inequality. But assessing those laws requires consideration of their reception, implementation, and enforcement.

17.   In my report, I discuss civil rights laws passed in New York State and New York City between the 1940s and 1960s. But I provide evidence that undermines Mr. Borelli's argument that Staten Island was a bastion of support for civil rights. Staten Island was the only borough whose representative on the Board of Estimate opposed New York City's 1951 Brown-Issacs Law that forbade discrimination in all publicly assisted private housing.[10] The Staten Island Real Estate Board challenged the constitutionality of New York anti-housing discrimination laws and denounced civil rights organizations that called for integrated housing on the island. And I discuss forty years of complaints about inadequate civil rights enforcement on Staten Island spanning the 1980s to the 2020s.[11]

18.   Mr. Borelli makes a remarkable and wholly unsustainable claim in his report: "There Is No History of Discrimination In Or Affecting The Political Subdivision."[12] He dismisses what he inaccurately calls "isolated incidents of racism."[13] He can only reach such a conclusion by ignoring large parts of Staten Island's history, discounting overwhelming evidence of racial segregation past and present, misrepresenting voting data, exaggerating the electoral success of

Random House, 2008), chapter 6.

[8] Opening Report, ¶ 38.
[9] Borelli Report, 25-26.
[10] Opening Report, ¶ 48.
[11] Opening Report, ¶ 48.
[12] Borelli Report, 19.
[13] Borelli Report, 19, 29.

non-white candidates for office on Staten Island, downplaying both police harassment and hate crimes, and especially ignoring a long history of segregation that was created and maintained through public policy, discriminatory real estate practices, and overt violations of civil rights laws. all of which are documented at length in my report. This history has an ongoing legacy that impairs the ability of Black and Latino voters from electing their favored candidates to office.

A. Housing Segregation

19.   My report offers extensive evidence of how Staten Island became a highly racially segregated borough over the course of the twentieth-century, including through discriminatory federal housing programs including redlining and public housing. I document how real estate brokers, landlords, and property managers flouted civil rights laws and explicitly discriminated against Blacks and Latinos, and I present evidence of recent violations of fair housing laws on Staten Island.[14] And I provide extensive empirical evidence of past and ongoing residential segregation by race and ethnicity on the island. This is a dismal history, but it is accurate. Mr. Borelli's report does not disprove any of the facts that I present on this matter.

20.   In my report, I present HOLC redlining maps for Staten Island and discuss, in some detail, HOLC "area descriptions," which included the racial composition of neighborhoods and which gave low ratings to neighborhoods with any Black populations and even those that were perceived as possible future magnets for Black residents.[15] The vast majority of scholars who have studied redlining found a) that redlining maps were based on and reinforced pernicious racial stereotypes; b) that the association of race and property value in redlining maps shaped discriminatory real estate practices; c) that the history of redlining is associated with ongoing patterns of racial segregation and housing inequality, and d) that a host of neighborhood-based

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[14] Opening Report, ¶¶ 49-54, 58-62.
[15] Opening Report, ¶¶ 34-40 and figure 5.

disadvantages, including in public health and environmental disamenities, result from redlining. In my report, I cite a large body of scholarship that connects past segregative housing policies with racial inequality today, including on Staten Island.[16] Mr. Borelli does not provide any evidence to contradict those findings.

21.   Mr. Borelli attempts to discredit my report by citing a single article by economic historian Price Fishback and his colleagues on Home Owners Loan Corporation (HOLC) and Federal Housing Administration (FHA) policies in the 1930s, through case studies of Baltimore, Maryland; Peoria, Illinois; and Greensboro, North Carolina.[17] Fishback et al. make two arguments: 1) that the HOLC provided loans to Black homebuyers in those cities, and 2) that the FHA devised its own maps and lending standards, independent from the HOLC.[18] Fishback et al. do not, however, dispute my central point. They state that when the HOLC issued loans, "it did so within the framework of segregation."[19] And they affirm that the FHA designed and implemented "its own system of redlining that was racially discriminatory."[20] The HOLC maps for Staten Island reflected and reinforced racial stereotypes that had direct bearing on the deeply-held assumption that the presence of even a few non-whites devalued properties and constituted a risk. Blacks could not get loans to finance or refinance, buy, or build in "white" neighborhoods. The FHA reinforced the notion that the introduction of "incompatible" racial groups into white neighborhoods would irreparably put the value of properties at risk of devaluation. The most pernicious long-term effects of redlining were limiting minorities' housing choices, preventing the construction of integrated housing developments in nearly every major metropolitan area, and making segregation appear

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[16] Opening Report, ¶ 40.
[17] Borelli Report, 28. Mr. Borelli does not appear to have read or engaged any of the books or articles on federal housing policy that I cite or consulted any HOLC maps in Opening Report, ¶¶ 34-40.
[18] Price Fishback, Jonathan Rose, Kenneth A. Snowden, and Thomas Storrs, "New Evidence on Redlining by Federal Housing Programs in the 1930s," *Journal of Urban Economics* 141 (2024), 103462.
[19] Fishback et al, "New Evidence," 2.
[20] Fishback et al, "New Evidence," 2.

natural.[21]

22. Fishback et al. are not primarily concerned with the pro-segregative consequences of FHA policy and do not write about the period after the 1930s in any detail. But throughout the period from the 1930s through the 1960s, the FHA expected that developers would abide by the so-called "neighborhood composition rule." That rule extended to public housing site decisions as well, a topic that I discuss at length in my Opening Report that Mr. Borelli ignores, even though it, too, offers compelling evidence of how public policies furthered segregation and how those policies had very long-lasting effects on the racial geography of Staten Island.[22]

23. The neighborhood composition rule required that developers of both single-family and apartment housing maintain neighborhood patterns of segregation. As historians Brent Cebul and Michael Glass show in their nationwide study of FHA Section 608 backed apartment housing developments, "FHA underwriters still upheld strict redlining policies, denying insurance for any developments that disrupted segregation."[23] The national database that underlies Cebul and Glass's research includes two Staten Island developments—Carolina Gardens (on Hylan Blvd in Oakwood) and Grymes Hill Apartments.[24] Both were constructed as all-white developments in the early 1950s, when New York laws forbade racial discrimination in housing. Grymes Hill remained segregated even after the passage of federal fair housing law.[25]

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[21] See Opening Report, ¶ 34, note 30.

[22] Opening Report, ¶¶ 41-46.

[23] Brent Cebul and Michael R. Glass, "Mortgaging Out: FHA Credit, Segregated Rental Housing, and the Remaking of Metropolitan America," *Journal of American History* 112 (2025), 64-91, quote 77.

[24] Brent Cebul, Michael R. Glass, and Robert K. Nelson, "Building Inequality: Mapping the Spatial and Racial Inequalities of FHA Section 608 Rental Housing, 1942-1950," https://buildinginequality.us.

[25] See *United States v. Fred C. Trump, Donald Trump, and Trump Management, Inc.*, No. 1:73-01529 (E.D.N.Y. October 15, 1973), available at Civil Rights Litigation Clearinghouse, https://clearinghouse.net/case/15342/. The suit also included another Staten Island apartment complex, the Tysens Gardens Apartments. "Race Bias Suit Filed Against Management Firm of Island Apartments," *Staten Island Advance*, March 7, 1978.

B. Historical and Ongoing Racial Segregation in Housing

24.   The best measure of segregation past and present is the index of dissimilarity. It shows that Blacks and Latinos on Staten Island are segregated today. Mr. Borelli offers his own calculations of the index of dissimilarity between whites and Latinos on Staten Island in 2010, 2020, and 2023. He finds a slightly lower index of dissimilarity than mine for 2010, but agrees with my finding that Latinos face moderate segregation.[26] The difference in our index number for 2010 is that I use Decennial Census data to calculate the index of dissimilarity, and Mr. Borelli uses five-year American Community Survey (ACS) data released in 2010.[27] The Decennial Census reports data for the entire population; the five-year ACS draws from a sample of about 3.5 million households collected monthly over a five-year period. Unlike the Decennial Census, the ACS is subject to sampling errors.[28] In any case, my finding that Latinos and Blacks are segregated on Staten Island stands.

DISPARITIES BETWEEN WHITES, BLACKS, AND LATINOS ON STATEN ISLAND

A. Educational Disparities

25.   My report documents significant disparities in educational attainment between whites, Blacks, and Latinos.[29] Mr. Borelli attempts to discount these data by documenting very modest increases in high school graduation and college graduation within each group between certain years, but fails to account for the fact that the rate of increase for whites on Staten Island is greater than for Blacks or Latinos.[30] Mr. Borelli offers a useful index of disparities at each

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[26] Borelli Report, 13.
[27] Opening Report, ¶ 11; Borelli Report, 10.
[28] U.S. Census Bureau, The Importance of the American Community Survey and the Decennial Census, https://www.census.gov/programs-surveys/acs/about/acs-and-census.html. For greater detail, see U.S. Census Bureau, Understanding and Using American Community Survey Data (September 2020), https://www.census.gov/content/dam/Census/library/publications/2020/acs/acs_general_handbook_2020.pdf
[29] Opening Report, ¶ 77 and figure 7.
[30] Borelli Report, 38-39.

educational level between Latinos, Blacks, and whites in his columns labeled "percent of white."
That somewhat confusingly titled column is actually an index, using whites as the index baseline
of 100.

26.   I present Mr. Borelli's index for whites, Blacks, and Latinos between 2015 and
2024 in a single table for clarity in Figure 1. The index shows that disparities in educational
attainment between the groups have persisted over the last nine years, despite a mix of very modest
gains that he shows and setbacks that he ignores. The table shows a small narrowing of the gap
between Black and white high school graduates—3.5 points between 2015 and 2024—and Latino
and white high school graduates—2.9 points between 2015 and 2024. One cannot make
predictions, as Mr. Borelli does, about future trends from these current data. Indeed, as a reminder
of the unpredictability of trends, the gaps between both Blacks and Latinos and whites who
graduated from high school grew between 2015 and 2020.

Figure 1: Index of Educational Attainment for Whites, Blacks, and Latinos on Staten Island, 2015, 2020, and 2024[31]

	2015	2020	2024
White high school graduate	100	100	100
Black high school graduate	93.6	93.2	97.1
Latino high school graduate	86.2	78.4	89.1
White bachelor's degree or higher	100	100	100
Black bachelor's degree or higher	75.0	76.3	71.8
Latino bachelor's degree or higher	54.9	56.1	52.6

27.   The most substantial educational disparities between Blacks, Latinos, and whites
on Staten Island are in college completion rates. Figure 1 shows that disparities between Blacks

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[31] Borelli Report, tables, 38-39.

and whites who received bachelor's degrees are persistent and have widened over time. The gap between the two groups worsened by 3.2 points between 2015 and 2024. Likewise, the gap between Latinos and whites who have received bachelor's degrees widened by 2.3 points between 2015 and 2024.

28.   Mr. Borelli's focus on small changes over time distracts from the most salient point. Vast educational disparities exist today. According to Mr. Borelli's own data, there is a more than 28-point gap between Black and white Staten Islanders with a college degree. A 47-point gap separates Latino and white Staten Islanders with a college degree. Mr. Borelli's data provide an independent confirmation of my finding that on Staten Island, "whites are far more likely than Blacks and Latinos to graduate from college."[32]

29.   Mr. Borelli's data on per pupil funding at Staten Island high schools[33] says nothing about educational disparities. The data that he reports are inadequate to assess any possible relationship between the racial and ethnic composition of enrolled students and school budgets. School funding formulas in New York public schools are very complex. When determining budgetary allocations to individual schools, the district considers many factors, including the type of education offered (comprehensive, vocational, etc.), student registration figures (as projected and adjusted), measures of student attainment, including grades and test scores, the number of students who are English-language learners, the number of students in need of special educational

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[32] Opening Report, ¶ 77. Borelli Report, 13, also presents College of Staten Island, CUNY (CSI) enrollment and graduation rates for Latinos. These data represent only a subset of the college enrolled and college graduate population in Staten Island—CSI is, after all, only one educational institution; it educates a subset of island residents (as well as non-Staten Islanders); and Staten Island residents surely attend universities elsewhere. There are many lacunae in these data as well, including enrollment versus graduation rates. Educational disparities are best measured using the aggregate data on educational attainment reported by the U.S. Census Bureau that is the basis of my report. The Census data capture the entire population of Staten Island residents over 25, not just a few thousand enrolled at one college.

[33] Borelli Report, 39-40.

interventions, the percentage of students in poverty, the number of unhoused students, and more.[34]

Those measures vary widely from school to school. As a result, school funding varies widely from school to school. Mr. Borelli seems unaware of the multiple factors that determine school funding allocations, even though the reports that he uses provide a detailed breakdown of budgets for every school. He also does not appear to have consulted the district's thorough explanation of funding formulas, which are conveniently posted on the school district website that he uses.[35] As a result, Mr. Borelli cannot and does not establish any relationship between school funding formulas and race or ethnicity.

30.   Educational attainment is centrally related to groups' ability to participate in the political process and turn out to vote. The relationship between education and political participation is very well documented by social scientists.[36] Mr. Borelli does not challenge this finding.

B. Disparities in Homeownership

31.   Mr. Borelli discounts data in my report that show clear disparities between rates of homeownership between whites, Blacks, and Latinos on Staten Island, while providing no evidence to the contrary.

32.   As my report shows, nearly 77 percent of whites on Staten Island are homeowners, but less than 36 percent of Blacks and less than 44 percent of Latinos are homeowners.[37] This enormous disparity belies Mr. Borelli's optimism about minority homeownership on the island.

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[34] New York City Public Schools, Division of Finance, Fair Student Funding Guide, FY 2024 (FSF Guide), https://www.nycenet.edu/offices/finance_schools/budget/DSBPO/allocationmemo/fy23_24/fy24_docs/FY2024_FSF_Guide.pdf.

[35] FSF Guide.

[36] Raymond E. Wolfinger and Steven J. Rosenstone, *Who Votes?* (New Haven: Yale University Press, 1980); Warren Miller and J. Merrill Shanks, *The New American Voter* (Cambridge: Harvard University Press, 1996), 51-56, 84-85, 87.

[37] Opening Report, ¶ 79 and figure 9.

Regarding housing, there are two Staten Islands: one of overwhelmingly white homeowners, the other of largely Black and Latino renters.

33.   Mr. Borelli raises two other issues in his discussion of homeownership. He suggests that "Blacks and Hispanics have historically had, and will likely continue to have, a better chance of owning a home in Staten Island than they would elsewhere in the area, in the State, or around the country."[38] But most relevant to analyzing impediments to voter participation by Blacks and Latinos versus whites on Staten Island are the huge disparities between homeownership between these groups *on Staten Island*, not the differences between homeownership rates by race elsewhere in New York or nationwide.[39]

34.   Mr. Borelli also asserts that the high demand and high cost of housing on Staten Island "makes it more difficult for all on Staten Island to purchase a home."[40] This assertion actually reinforces my report's analysis of socio-economic disparities by race and ethnicity. Because whites on Staten Island have significantly higher income than Blacks and Latinos, they are far more likely to have the financial resources to put down payments on homes and meet monthly mortgage obligations than non-whites.[41] The large income disparities between whites, Blacks, and Latinos on Staten Island are a key cause of disparities in homeownership.

35.   Disparities in homeownership and renting affect political participation. There is a broad consensus among scholars of citizen participation and voter behavior that there is a strong positive relationship between rates of homeownership, political engagement, and voter turnout.[42]

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[38] Borelli Report, 42.

[39] It should be noted that white homeownership rates are higher in Staten Island than nationwide; Latino and Black homeownership rates are lower on Staten Island than nationwide. For Staten Island, see Report, ¶ 79, figure 9. For national data, see U.S. Census, American Community Survey, 2019-2023, Tables B25003B, 25003H, and 25003I. For Staten Island data, see Opening Report, ¶ 79, figure 9.

[40] Borelli Report, 42.

[41] Opening Report, ¶ 79, figure 9.

[42] John I. Gilderbloom and John P. Markham, "The Impact of Homeownership on Political Beliefs," *Social Forces*, 73:4 (1995), pp. 1589-1607; Paul William Kingston, John L.P. Thompson and Douglas M. Eichar, "The Politics of

Disparities in homeownership and renting on Staten Island have serious implications for the differential involvement of Blacks, Latinos, and whites in the political process. Mr. Borelli neither discusses nor disputes scholarship showing the relationship of homeownership and political participation.

C. Income Disparities

36.   Mr. Borelli's reporting of income data is muddled. It is not clear from his text and captions whether he is referring to median income (the most widely used measure of income disparity) or mean income. And it is not clear whether his data refer to per capita income or household income.[43] Despite Mr. Borelli's terminological confusion, his data unequivocally show that Blacks and Latinos on Staten Island earn substantially less than whites. Mr. Borelli's tables show that on Staten Island, Blacks and Latinos have incomes of less than two-thirds that of whites.[44] That is a stark disparity and is consistent with my findings.

37.   The persistence of large income disparities on Staten Island matters because social scientists have long demonstrated the relationship between income and rates of political participation.[45] Mr. Borelli neither cites nor challenges this scholarship.

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RACIAL APPEALS

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38.   Mr. Borelli asserts that racial appeals are uncommon in Staten Island. He draws that conclusion from a newspaper database search using the words "racism" and "issues" during election years spanning 2000 to 2024. No professional historian could responsibly conduct

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Homeownership," *American Politics Research*, 12:2 (1984), 131-150; Kay Lehmann Schlozman, "Citizen Participation in America: What Do We Know? Why Do We Care?" in Ira Katznelson and H.V Milner, eds., *Political Science: the State of the Discipline* (New York: W.W. Norton & Company, 2002), 433-461; Miller and Shanks, *New American Voter*, 86, 88, 195, 274-75.

[43] The three tables under the heading, "Median Income," in Borelli Report, 43-44, are sub-headed "Household Income." The income reported in each table is categorized as "Mean Income."

[44] See unnumbered tables, Borelli Report, 43.

[45] Wolfinger and Rosenstone, *Who Votes?*, 20-21, 25 and Steven J. Rosenstone and John Mark Hansen, *Mobilization, Participation, and Democracy in America* (New York: Macmillan, 1993).

newspaper research on a topic that touches on advertisements, media, campaigns, and racially charged language or images by using just two keywords. Vague terms such as "issues" are unlikely to yield accurate results. It is necessary to consider, test, and evaluate a variety of search terms when conducting a search. It is also necessary to search for variants of keywords, related terms, and synonyms.[46]

39.   One of Mr. Borelli's own sources—which he could not have found using the keywords "racism" and "issues"—offers a textbook example of a racial appeal. Citing an article in *The City*, an online publication based in New York, Mr. Borelli offers a brief and favorable account of the Young Leaders, a Black-led Staten Island youth organization. He includes the Young Leaders on a list of "various groups that support minority rights" that "held rallies around the borough in an effort to get voters engaged in the 2020 election."[47]

40.   As part of its efforts to mobilize voters in 2020, the Young Leaders held peaceful marches in different Staten Island communities, including Rossville, New Dorp, and Port Richmond. They also forged a coalition with other Black and Latino organizations on Staten Island, including La Colmena, a migrant rights advocacy group. The Young Leaders led a voter education campaign and sponsored voter registration drives to increase turnout among Blacks and Latinos on the North Shore. The Young Leaders described their mission as overcoming racial disparities in political participation between the North Shore and the overwhelmingly white South Shore.[48] They recognized and worked to reinforce a community of interest between Blacks and Latinos.

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[46] Bob Nicholson, "Digital Research," in *Research Methods for History*, ed. Simon Gunn and Lucy Faire, Second Edition (Glasgow: Edinburgh University Press, 2016), 184-187.
[47] Borelli Report, 48, citing Clifford Michel, "Their Anti-Racism Marches Were Twisted in a $4 Million GOP Attack Ad Campaign. Now, They Just Want to Get Out the Vote," *The City*, November 22, 2020.
[48] Michel, "Their Anti-Racism Marches Were Twisted."

41.   During the 2020 11th Congressional District race, the Young Leaders were the subject of overt racial appeals in two pro-Malliotakis advertisements. *The City* article (cited by Mr. Borelli) reported: "Footage of one peaceful march — interspersed with doctored images of police cars ablaze — became the centerpiece of an attack ad touting Assemblymember Nicole Malliotakis and trashing Rep. Max Rose in her successful bid to oust the freshman Democrat from the [sic] Staten Island's House seat."[49] *The City* continued: "One Republican political action committee, the Congressional Leadership Fund, poured in at least $4 million into televising ads focused on Rose attending the march…One of the spots showed some of the Young Leaders of Staten Island and footage of their June 3 march in New Dorp, spliced with violent scenes, while a narrator spoke of 'criminals hailed as freedom fighters.'"[50] Linking candidates to Black criminality is a common strategy in electoral racial appeals. Contrary to how they were depicted in the advertisements, the Young Leaders called for better police-community relations, opposed calls to defund the police, and stated their concerns about crime.[51]

42.   The political ads in the 2020 11th District Congressional campaign used footage of the Young Leaders to appeal blatantly to white racial fears of criminality, riotousness, and violence. Princeton political scientist LaFleur Stephens-Dougan defines racial appeals as "[n]egative stereotypical imagery that might activate voters' negative racial attitudes includ[ing] depictions of African Americans as criminals…"[52] The ad featuring the Young Leaders explicitly deployed misleading and stereotypical imagery. The use of such racial appeals distorts the political climate, furthers racial polarization, and legitimizes racist sentiments.

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[49] The advertisement is available at https://www.youtube.com/watch?v=lQDu5Ix7HYE.
[50] Michel, "Their Anti-Racism Marches Were Twisted."
[51] Michel, "Their Anti-Racism Marches Were Twisted"
[52] Opening Report, ¶ 91.

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SECESSION AND RACIAL RESENTMENTS

43.   Mr. Borelli states that I "incorrectly frame the Staten Island secession movement solely in racial terms."[53] This is a misrepresentation of the plain language of my report, in which I write: "Staten Island's secession activists expressed many grievances, including longstanding opposition to the city's massive Fresh Kills garbage dump on the island and resentments that 'the city' dismissed the needs and grievances of the Island. Many secessionists also held racial resentments, including 'a complicated mix of race and ideology that is difficult to [u]ntangle.'"[54] Historical, political scientific, legal, and journalistic accounts, including those cited by Mr. Borelli, provide abundant evidence that white racial resentments or racial ideology played a role in the secession movement.[55]

VOTING DATA AND POLITICAL PARTICIPATION

44.   Mr. Borelli reports voting data by race and ethnicity for 2018, 2022, and 2024 for the entire United States and for the entire State of New York.[56] It is not sound methodology to extrapolate from these figures to Staten Island, for which he provides no data.

45.   Mr. Borelli's state level data are particularly problematic.[57] His Table 3, which reproduces a page from a pamphlet by a political advocacy organization published during the 2024 primaries, shows that the number of Latinos who voted in New York State increased in the entire state by about 5,000 between 2016 and 2020. The table also speculates about the "projected Latino vote 2024," even though the general election was months away. Mr. Borelli does not provide actual

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[53] Borelli Report, 54.
[54] Opening Report, ¶ 93, quote from Kramer and Flanagan, 128.
[55] Opening Report, ¶¶ 93-97 draws from scholarship on Staten Island by political scientists, historians, legal scholars, journalists, and contemporary observers. Not every scholar or writer cited gives equal weight to every factor shaping the secession movement, but every one of them mentions the racial politics and/or consequences of the secession movement.
[56] Borelli Report, 34-37.
[57] Borelli Report, 34-35.

turnout data for the 2024 general election. In addition, we need more than raw numbers of voters to measure political participation adequately.

46.   In Tables 4 and 5, Mr. Borelli presents 2018 and 2022 nationwide data showing Black, white, and Latino voter registration and turnout.[58] His tables show a modest gain in the percentage of Latinos and Blacks registered to vote between 2018 and 2022, but a decline in the percentage of Latinos and Blacks who actually voted. Crucially, the tables show very large disparities in political participation between white and Latino voters and white and Black voters. In 2022, white registration was 15 points higher than Latinos; white turnout was almost 20 points higher. White registration was more than 9 points higher than Blacks; white turnout was 19 points higher than Blacks. These are real, substantial disparities in political participation.

47.   Mr. Borelli's tables 3–5 do not provide any evidence for his claim that "the data shows immense progress."[59] In fact, the data provide evidence of significant disparities in political participation nationwide between whites, Blacks, and Latinos.

BLACK AND LATINO ELECTED OFFICIALS ON STATEN ISLAND

48.   Mr. Borelli asserts that "Black and Hispanics Have Achieved Success in Being Elected to Office in Staten Island."[60] Unfortunately, his evidentiary base is thin. Despite its long history of Black settlement and its rapidly growing Latino population, Staten Island has had only

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[58] Borelli Report, 35-36. Borelli, 35, also errs in referring to "Spanish-speaking voters." The data do not report languages spoken. Latinos or Hispanics may or may not be Spanish speakers.

[59] Borelli Report, 36.

[60] Borelli Report, 29-31, quote 29. In addition to his discussion of Black and Latino elected officials and judges, Mr. Borelli also inaccurately asserts that Asian Americans have been elected to judgeships on Staten Island. None of the three Asian American judges mentioned by Mr. Borelli were elected to their posts. They have all held appointed positions. Staten Island does not have any Asian elected officials. Mr. Borelli also misspells Judge Alexander Jeong's name as "Jeung." On Judge Jeong, who has held four different appointed judgeships, see https://iapps.courts.state.ny.us/judicialdirectory/Bio?judge_id=QmrWtYwd4drz5cY6DlGi5A%3D%3D; for Judge Koshy, who was appointed by Mayor de Blasio, see https://iapps.courts.state.ny.us/judicialdirectory/Bio?judge_id=64SaWOTH9gJklfw71AzoWw%3D%3D, for Judge Rajeswari, also appointed by Mayor de Blasio, see https://iapps.courts.state.ny.us/judicialdirectory/Bio?judge_id=OUsytzCjU4WrgahUEku5eA%3D%3D.

two Black city council members in its entire history: Debi Rose (the first Black elected official on the island, when she took office in 2010)[61] and Kamillah Hanks (who succeeded Rose in 2022).[62] Both were elected from the North Shore, the center of the island's Black and Latino population. Charles B. Fall, whose majority non-white district includes the North Shore and part of Lower Manhattan, was elected to the State Assembly in 2018. He is the first and only Black person ever elected to represent Staten Islanders in Albany.[63] The only elected official of Latino origin ever elected on Staten Island is Representative Nicole Malliotakis, whose mother immigrated from Cuba and whose father is Greek.[64]

49. Mr. Borelli incorrectly states that Staten Island has elected one Latino and two Black judges.[65] Judge Ann Thompson is the only Black or Latino person ever elected to the bench on Staten Island. She won her seat in an uncontested race in 2022: she was one of three candidates who ran for three open judgeships in the 13th Judicial District of the New York State Supreme Court.[66] She had run for another 13th Judicial District seat just a year earlier, coming in a distant third in a four-person race.[67] After she was elected, the *Staten Island Advance* reported that Judge Thompson "said it's upsetting to her that it's 2022 and we're still grappling with 'a first anything.'"[68]

50. Mr. Borelli wrongly asserts that the Honorable Tashanna Golden and the

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[61] Opening Report, ¶ 90.

[62] Kamilla Hanks, https://ballotpedia.org/Kamillah_Hanks.. Council member Hanks was reelected to her North Shore district in 2023 and 2025.

[63] New York State Assembly District 61, https://ballotpedia.org/New_York_State_Assembly_District_61; and Charles D. Fall, Biography, https://assembly.state.ny.us/mem/Charles-D-Fall/bio/

[64] Opening Report, ¶ 90.

[65] Borelli Report, 30.

[66] Municipal Elections in Richmond County, New York, 2022, *Ballotpedia*, https://ballotpedia.org/Municipal_elections_in_Richmond_County,_New_York_(2022).

[67] Municipal Elections in Richmond County, New York, 2021, https://ballotpedia.org/Municipal_elections_in_Richmond_County,_New_York_(2021)

[68] Kristin Thompson, "First Woman of Color Elected to Staten Island Supreme Court: Ann Thompson Talks About the Road to the Bench," *Staten Island Advance*, November 20, 2022, https://www.silive.com/news/2022/11/first-woman-of-color-elected-to-si-supreme-court-hon-ann-thompson-talks-about-the-road-to-the-bench.html

Honorable Raymond Rodriguez were elected by Staten Island voters. Judge Golden is a native of Staten Island, but she was neither elected nor serves as a judge on Staten Island. She was appointed to the Housing Court, Civil Court of the City of New York, Kings County. Her courtroom is in Brooklyn.[69] Judge Golden established her reputation in part as a critic of ongoing and persistent racial disparities on Staten Island. Before her appointment to the bench, Judge Golden served as an advisor for The Disparity Project, which "uses data to lay bare inequities on the North Shore and its communities of color, the project examines the roots of these disparities, the people they impact and the possible solutions."[70]

51.   Judge Raymond Rodriguez has never held an elected office or an elected judicial position on Staten Island. He was appointed to New York City Criminal Court. Judges on the Criminal Court are appointed by the New York City mayor. Later, Rodriguez was appointed—not elected—as an acting justice in the 13th Judicial District, New York Supreme Court.[71] When Rodriguez ran in the November 2025 election for the open position on 13th Judicial District bench, he lost overwhelmingly with only 37.1 percent of the vote.[72]

52.   Given that Blacks have lived on Staten Island since the 1820s, it is noteworthy that it took nearly *two centuries* for Staten Islanders to elect any Blacks to office. It is telling that

[69] New York State Unified Court System, Judicial Directory, Judges of the Trial Courts, Hon. Tashanna B. Golden, https://iapps.courts.state.ny.us/judicialdirectory/Bio?judge_id=Tvl_PLUS_Tuym2DunSBVlsozG7A%3D%3D.

[70] "10 Outstanding Community Members Steer Advance/SI Live Project on Disparity," *Staten Island Advance*, June 27, 2020. https://www.silive.com/news/2020/06/10-outstanding-community-members-steer-advancesilivecom-project-on-disparity.html

[71] Judge Rodriguez's history of judicial appointments is available here: https://iapps.courts.state.ny.us/judicialdirectory/Bio?judge_id=Qczucl0ke3HxjZo7w9Rs3Q%3D%3D

[72] Raymond Rodriguez, https://ballotpedia.org/Raymond_Rodriguez. Judge Rodriguez was the target of a racial appeal advertisement during the 2025 election that blamed him for the release of Dantey Moore, a Black man convicted of murder on Staten Island in 2022. The ad blamed Rodriguez for the fact that Moore had been released after felony charges by another judge, on the recommendation of the district attorney. Judge Rodriguez had presided over earlier misdemeanor cases involving Moore, unrelated to his pre-murder release, and had given him an "enhanced sentence" in one case. *See* "Staten Island Murder Case Roils Judicial Race: GOP Says Judge Previously 'Let Loose' Suspect, Judge Slams 'False Narrative," *Staten Island Advance*, October 30. 2025, https://www.silive.com/politics/2025/10/judge-slams-false-narrative-as-2017-staten-island-murder-case-prompts-heated-exchange-in-election.html

three of the four Black elected officials represent the North Shore (including, in one case, part of Lower Manhattan); and that the fourth was elected in an uncontested race. Also, despite the fact that Latinos make up nearly one-fifth of Staten Island's population, only one person with Latino heritage has been elected to office on the island.

HATE CRIMES, ANTI-IMMIGRANT HARASSMENT AND VIOLENCE

53.   Mr. Borelli also minimizes the impact of hate groups and what he derisively calls "purported hate crimes" on members of protected groups on Staten Island. His treatment of the Ku Klux Klan is contradictory: he discounts its importance but provides additional detail to my account, including the 1992 discovery of literature referring to the Staten Island chapter of the KKK and the presence of racist skinheads on the island in that period.[73] He also does not mention other KKK activities on Staten Island that I document in my report.[74] He cites a 2015 Southern Poverty Law Center (SPLC) database that shows no hate groups on the island, but does not mention the most recent SPLC report (2024) that identifies the Proud Boys as an active extremist group on Staten Island.[75]

54.   The hate crimes that I document in great detail in my report cannot be callously dismissed as "purported" or trivial. They include the Klan's siege the Browne family, the arson attack on a Black family who tried to move into New Dorp, attacks on Blacks in schools, parks, and a shopping mall, the spraying of racist graffiti, brutal beatings of three Blacks and one Latino on the night of the election of Barack Obama, the blockading and stoning of a bus bringing refugees

[73] Borelli Report, 27.
[74] Opening Report, ¶ 67.
[75] Borelli Report, 48. I cite 2024 SPLC report of the Proud Boys in Staten Island in Opening Report, ¶ 36, note 108. In Opening Report ¶ 36, I mistakenly stated that the Proud Boys attended the rally. Actually, John Tabacco, a Newsmax personality, raised the prospect of calling them to attend the rally. Paul Liotta, "'We Are At War!': Protestors Against Staten Island Migrant Shelter Pledge 'Disruption' Akin to COVID-19 Mayhem," *Staten Island Advance*, August 14, 2023.

to a Staten Island shelter, and the defacing of Black candidates' posters.

55.   The Lawyers Committee for Civil Rights Under the Law notes that "[h]ate crimes are 'messaging crimes'—meaning that the target of any one hate crime is not just the direct victim, but also anyone who shares the victim's targeted identity, whether that be race, gender, sexual orientation, or another protected category."[76] Staten Island's long history of hate crimes, including the two on Staten Island against Blacks as recently as 2025 that Mr. Borelli reports[77], cannot be discounted for their impact on the victims and the wider community.

56.   The Lawyers Committee also notes that hate crimes can hinder groups' ability to participate in the political process: "When hate crimes or hate incidents occur during elections, they can send a message that it is dangerous to vote and deter members of historically marginalized groups from participating in the democratic process. By discouraging communities of color and others from voting, perpetrators of hate incidents attempt to stifle the voices of historically marginalized groups, resulting in skewed elections."[78] The fact that hate crimes targeting minorities on Staten Island have occurred historically and in the very recent past, including around elections, can negatively impact voter participation.[79]

57.   Mr. Borrelli describes Staten Island's often disruptive and violent anti-immigrant protests in 2023 and 2024 as an example of "Staten Islanders' active participation in the political process by exercising their First Amendment rights."[80] It is incontrovertibly true that citizens have

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[76] National Lawyers Committee for Civil Rights Under the Law, *Hate and Elections: How Racism and Bigotry Threaten Election Integrity in the United States* (2000), 1–2, https://lawyerscommittee.org/wp-content/uploads/2020/09/LC2_HATE-IN-ELECTIONS_RPT_E_HIGH-1.pdf.
[77] Borelli Report, 48.
[78] National Lawyers Committee for Civil Rights Under the Law, *Hate and Elections: How Racism and Bigotry Threaten Election Integrity in the United States* (2000), quote 2, https://lawyerscommittee.org/wp-content/uploads/2020/09/LC2_HATE-IN-ELECTIONS_RPT_E_HIGH-1.pdf.
[79] For examples of hate incidents that occurred in and around elections, see Original Report, ¶¶ 57, 66-67, 72-74, 101-104.
[80] Borelli Report, 50.

the right to express legitimate differences over immigration policy or oppose the provision of housing and other services to support displaced families. However, the acts at issue here included protestors surrounding and blockading a bus carrying mostly immigrant women and children for more than seven hours, hurling objects at the bus, pelting migrants with rocks, and threatening to kill them.[81] Subsequent raucous protests at refugee shelters including blasting of loud music at night and flashing bright lights into the windows of rooms housing immigrant families.[82] These are pathological acts of harassment and violence directed toward innocent people, not benign expressions of political opinions.

CIVIL RIGHTS, IMMIGRANT RIGHTS, AND COMMUNITY ORGANIZATIONS

58. Mr. Borelli provides an extensive list of community organizations, many Black and/or Latino-led, as putative evidence of "Staten Island's clear commitment to supporting its minority residents and ending racism…"[83] The very existence of these organizations is testimony to ongoing racial discrimination, segregation, and disparities on Staten Island that Mr. Borelli ignores or downplays throughout his report. Consider several of the organizations that he includes on his list.

59. Mr. Borelli features the NAACP's Staten Island branch, founded in the aftermath

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[81] "NYPD: Cop Injured, 48 Year Old Man One of Ten People Arrested After Protest at New Migrant Shelter on Staten Island," *Staten Island Advance*, September 20, 2023, https://www.silive.com/crime-safety/2023/09/nypd-cop-injured-10-people-taken-in-for-questioning-after-protest-at-migrant-shelter-on-staten-island.html; Lauren Lovallo, "They Put Family First: Facing Misery or Death, These Migrants Say They Had to Flee," *Staten Island Advance*, October 21, 2023, https://www.silive.com/news/2023/10/they-put-family-first-facing-misery-or-death-these-migrants-say-they-had-to-flee.html; Erica Brosnan, "Protestors Arrested Outside Staten Island Migrant Shelter," NY1, September 20, 2023, https://ny1.com/nyc/all-boroughs/news/2023/09/20/protesters-arrested-outside-staten-island-migrant-shelter. Videos of the attack taken from migrants inside the besieged bus were posted by the *Staten Island Advance* on YouTube. See *Staten Island Advance*, "Migrants on Bus Film Anti-Migrant Shelter Protest on Staten Island," https://www.youtube.com/watch?v=W1EKnrhAfOU. The comments thread following the video is also revealing of anti-immigrant sentiments.

[82] Eric Bascombe, "Island Shores Migrant Shelter Plagued by Protestors Flashing Lights, Blaring Megaphones," *Staten Island Advance*, October 27, 2023, https://www.silive.com/news/2023/10/island-shores-migrant-shelter-plagued-by-protesters-flashing-lights-blaring-megaphones.html.

[83] Borelli Report, 45. Mr. Borelli also mentions "communities harmed by racism and social injustice," even though he largely ignores or dismisses evidence of racism and social injustice throughout the report.

of the 1924–25 attacks on a Black family that I document in my report.[84] During World War II, it advocated on behalf of Black soldiers on the island who were the victims of discriminatory policing.[85] In the 1990s, the NAACP criticized the racial politics of Staten Island secessionists.[86] Today, the NAACP describes its mission as "confronting racial disparities in education, health, housing, criminal justice, or economic opportunity" on Staten Island.[87]

60.   La Colmena, an immigrant rights organization, addresses economic disparities afflicting Latino immigrants on Staten Island by providing them with jobs and training.[88] La Colmena has also challenged hate and violence targeting migrants on the island, including the violent anti-immigrant protests in 2023. La Colmena provided journalists with videos depicting the "brutal treatment" of refugees at a violent September 2023 anti-immigrant protest that attracted nearly 1,000 people, including some of Staten Island's most prominent white politicians.[89] And it partnered with the Staten Island Young Leaders, a Black-led organization, to increase voter turnout.[90] La Colmena's work is necessary precisely because Staten Island's Latino residents still face serious economic disparities, harassment and violence, and obstacles to political participation.

61.   The Staten Island Urban Center brings together Blacks and Latinos to advocate for community development on the North Shore.[91] The Urban Center's director has called for "a racial impact study" to "highlight the urgency for deeper affordable housing and the opportunity to address long-standing inequalities while advancing local initiatives."[92] SIUC's community

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[84] Opening Report, ¶ 33.
[85] Opening Report, ¶ 80.
[86] Julia G. Clarke, "Where Will We Turn?: Staten Island's African-American Leaders and Anti-Poverty Advocates Fear the Consequences of Secession," *City Limits*, February 1994, 22-23.
[87] Borelli Report, 46; Staten Island NAACP, https://statenislandnaacp.org/.
[88] La Colmena, https://www.lacolmenanyc.org/.
[89] Lovallo, "They Put Family First."
[90] "In Staten Island, A Burgeoning Youth-Led Movement for Social Justice is Afoot," https://www.lacolmenanyc.org/jobs?lightbox=dataItem-kybwanh21.
[91] Staten Island Urban Center, https://www.siurbancenter.org/we-are-innovators--activists.html.
[92] Kelly Vilar, "The City Must Incorporate Race into Land-Use Decisions," *Staten Island Advance*, May 9, 2021.

development strategy responds directly to ongoing racial disparities on the island.

62.   Mr. Borelli also mentions the Staten Island chapter of National Action Network (NAN). Founded in the aftermath of Eric Garner's death, Staten Island NAN has challenged police harassment and brutality targeting Blacks. NAN has called for the investigation of hate crimes, demanded stronger civil rights legislation, and continued to challenge policing disparities on the island through nonviolent protests.[93] And as Mr. Borelli reports, NAN worked to increase political participation among Black Staten Islanders.[94] NAN's ongoing work on Staten Island attests to ongoing and unresolved issues, particularly related to Staten Island's long history of racially disparate policing and disparities in political participation.

63.   These and many other Black, Latino, and immigrant advocacy groups, civil rights organizations, and employment centers, currently exist on Staten Island precisely because of the long-standing inequalities and disparities that continue to exist on Staten Island—not because they have been overcome.

CONCLUSION

64.   Mr. Borelli's report is riddled with errors. Many of his sources, especially data on socio-economic, educational, and housing disparities, undermine his arguments and reinforce mine. He does not deploy standard historical methods for the research of historical newspapers and is not conversant in the large body of scholarship on housing segregation. He exaggerates rates of Latino political participation and makes unfounded claims about the success of Black and Latino

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[93] Borelli Report, 48. For National Action Network's mission and activities, see https://nationalactionnetwork.net. Tracey Porpora, "Rev. Al Sharpton Opens Staten Island Chapter of National Action Network," *Staten Island Advance*, May 16, 2015, https://www.silive.com/northshore/2015/05/rev_al_sharpton_plans_opens_na.html; NAN, Statement by Rev. Al Sharpton On the Death of Staten Island Teenager Dayshen McKenzie Who Allegedly Died Fleeing a Racist Gun Wielding Mob, June 3, 2016, https://nationalactionnetwork.net/featured/statement-by-rev-al-sharpton-on-the-death-of-staten-island-teenager-dayshen-mckenzie-who-allegedly-died-fleeing-a-racist-gun-waving-mob/; Jason Paderon, "Staten Island's NAN Chapter Marches for Legislative Change," *Staten Island Advance*, June 8, 2020, https://www.silive.com/galleries/OJGC3QZGCJD7RKKBPCNP3Z3KOY/.
[94] Borelli Report, 48.

candidates for office on Staten Island. He ignores extensive evidence of past and ongoing discrimination in housing and policing. He dismisses evidence of racial appeals, hate crimes, and whitewashes disruptive and violent anti-immigrant protests. His opinions are often not founded upon carefully adduced evidence, reliable data, or accurate reportage.

Dated: December 18, 2025

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Thomas J. Sugrue

Exhibit H

Corrected Expert Report
Maxwell Palmer
November 18, 2025

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Michael Williams, José Ramírez-Garofalo, Aixa Torres, and
Melissa Carty,

                                        Petitioners,

                      -against-

Board of Elections of the State of New York; Kristen
Zebrowski Stavisky, in her official capacity as Co-Executive
Director of the Board of Elections of the State of New York;
Raymond J. Riley, III, in his official capacity as Co-
Executive Director of the Board of Elections of the State of
New York; Peter S. Kosinski, in his official capacity as Co-
Chair and Commissioner of the Board of Elections of the
State of New York; Henry T. Berger, in his official capacity
as Co-Chair and Commissioner of the Board of Elections of
the State of New York; Anthony J. Casale, in his official
capacity as Commissioner of the Board of Elections of the
State of New York; Essma Bagnuola, in her official capacity
as Commissioner of the Board of Elections of the State of
New York; Kathy Hochul, in her official capacity as
Governor of New York; Andrea Stewart-Cousins, in her
official capacity as Senate Majority Leader and President
Pro Tempore of the New York State Senate; Carl E. Heastie,
in his official capacity as Speaker of the New York State
Assembly; and Letitia James, in her official capacity as
Attorney General of New York,

                                    Respondents,

                      -and-

Representative Nicole Malliotakis, Edward L. Lai, Joel
Medina, Solomon B. Reeves, Angela Sisto, and Faith Togba

                          Intervenor-Respondents,

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Index No. 164002/2025

**<u>Expert Report of Dr.
Maxwell Palmer</u>**

EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. I was promoted to Associate Professor, with tenure, in 2021. I am also a Civic Tech Fellow in the Faculty of Computing & Data Sciences and a Faculty Fellow at the Initiative on Cities. I teach and conduct research on American politics and political methodology.

2. I have published academic work in leading peer-reviewed academic journals, including the *American Political Science Review, Journal of Politics, Perspectives on Politics, Political Analysis, British Journal of Political Science, Journal of Empirical Legal Studies, Political Science Research and Methods, Legislative Studies Quarterly,* and *Urban Affairs Review.* My book, *Neighborhood Defenders: Participatory Politics and America's Housing Crisis,* was published by Cambridge University Press in 2019. I have also published academic work in the *Ohio State University Law Review.* My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations, and data sources including academic surveys, precinct-level election results, voter registration and vote history files, and census data. My curriculum vitae is attached to this report.

3. I have served as an expert witness or litigation consultant on numerous cases involving redistricting or voting restrictions. I testified at trial, court hearing, or by deposition in *Bethune Hill v. Virginia* before the U.S. District Court for the Eastern District of Virginia (No. 3:14-cv-00852-REP-AWA-BMK); *Thomas v. Bryant* before the U.S. District Court for the Southern District of Mississippi (No. 3:18-CV-00441-CWR-FKB); *Chestnut v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:18-cv-00907-KOB); *Dwight v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:18-cv-2869-RWS); *Bruni v. Hughs* before the U.S. District Court for the Southern District of Texas (No. 5:20-cv-35); *Caster v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:21-cv-1536-AMM); *Pendergrass v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:21-CV-05339-SCJ); *Grant v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:22-CV-00122-SCJ); *Galmon v. Ardoin* before the U.S. District Court for the Middle District of Louisiana (3:22-cv-00214-SDD-SDJ); *In Re: Georgia Senate Bill 202* (1:12-MI-55555-JPB) before the U.S. District Court for the Northern District of Georgia; *Vet Voice Foundation, et al., v. Hobbs, et al.* (No. 22-2-19384-1 SEA) before the King County Superior Court of Washington; *Vet Voice Foundation, et al., v. Griswold* (No. 2022CV033456) before the District Court of the City and County of Denver, Colorado; *Agee v. Benson* before the U.S. District Court for the Western District of Michigan (No. 1:22-CV-00272-PLM-RMK-JTN); and *Williams, et. al., v. Hall* before the U.S. District Court for the Middle District of North Carolina (1:23-CV-01057-TDS-JLW). I also served as the independent racially polarized voting analyst

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for the Virginia Redistricting Commission in 2021, and I have worked as a consultant to the United States Department of Justice on several matters. My expert testimony has been accepted and relied upon by courts; in no case has my testimony been rejected or found unreliable.

4. I was retained by the petitioners in this litigation to offer an expert opinion on the extent to which voting is racially polarized in the 11th Congressional District and to evaluate the ability of Black and Hispanic preferred candidates to win elections in this district. I was also asked to analyze the extent to which voting is racially polarized in the illustrative district, and to evaluate the ability of Black and Hispanic preferred candidates to win elections in the illustrative district.

5. I find strong evidence of racially polarized voting in the 11th Congressional District. Across 20 elections from 2017 to 2024, I find that Black and Hispanic voters share the same candidates of choice, and that Black and Hispanic voters consistently support different candidates than White voters.

6. Black and Hispanic voters are generally unable to elect their preferred candidates in the 11th Congressional District. The Black and Hispanic preferred candidate won only 5 of the 20 elections that I examined, and averaged 40.9% of the vote.

7. I find that there is substantially less racially polarized voting in the illustrative district. On average, White voters support Black and Hispanic preferred candidates with an average of 41.8% of the vote.

8. Black and Hispanic voters are generally able to elect their preferred candidates in the illustrative district. Overall, Black and Hispanic preferred candidates won 16 of the 18 elections that I examined, and averaged 54.0% of the vote.

Racially Polarized Voting in the 11th Congressional District

9. To analyze racially polarized voting, I examined general election results in the 11th Congressional District from 2017 to 2024. I included all offices where both major parties contested the election across the entire district. This includes federal offices (U.S. President, U.S. Senate), statewide offices (Governor, Attorney General, and State Comptroller), and New York City offices (Mayor, Public Advocate, and City Comptroller). I also included the 2022 and 2024 elections for U.S. Representative in the 11th District. In all, I analyzed 20 different contests.

10. I analyzed racially polarized voting using precinct-level election results and precinct-level data on citizen voting age population by race.[1] I downloaded the precinct-level election data from the website of the New York City Board of Elections[2], and precinct boundaries for each year from the New York City Department of City Planning.[3]

11. In analyzing racially polarized voting in each election, I used a statistical procedure, ecological inference (EI), that estimates group-level preferences based on aggregate data. I analyzed the results for five groups: Non-Hispanic Black, Hispanic, Non-Hispanic White, Non-Hispanic Asian American and Pacific Islander, and Other, based on citizen voting age population (C-VAP) data from the 2023 American Community Survey. This data is reported by the U.S. Cen-

sus Bureau at the block group level. To calculate CVAP for each group at the precinct level I disaggregated block group data to census blocks using 2020 census populations, and then aggregated to precincts using the precinct shape files for each year.

12. In New York, candidates may run under multiple different parties in the same election. For each unique candidate, I aggregated all of the votes they received under different party labels in each precinct. When more than three different candidates ran in the same contest, I aggregated the additional candidates with the lowest numbers of votes into a single "Other" candidate. For example, in the 2017 election for New York City Mayor, there were seven different candidates. I combined the four candidates receiving the lowest numbers of votes into a single "Other" candidate.

13. For each of the 20 contests, I estimated a separate ecological inference model. The results of each model are estimates of the percentage of each group that voted for each candidate in each election. The results include both a mean estimate (the most likely vote share), and a 95% confidence interval.[4]

14. Interpreting the results of the ecological inference models proceeds in two general stages. First, I examined the support for each candidate by each demographic group to determine if members of the group vote cohesively in support of a single candidate in each election. When a significant majority of the group supports a single candidate, I can then identify that candidate as the group's preferred candidate. If the group's support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate and does not have a clear preference. Second, after identifying the preferred candidate for each group (or the lack of such a candidate), I then compared the preferences of voters of each group to the voters of the other groups. Evidence of racially polarized voting is found when voters of different groups support different candidates, and evidence of cohesion is found when voters of different groups support that same candidate.

15. Figure 1 shows the ecological inference estimates for the 2022 and 2024 elections for U.S. House in the 11th Congressional District. The estimated levels of support for each candidate for each group are represented by the colored points, and the vertical lines indicate the range of the 95% confidence intervals. Black voters are extremely cohesive, with a clear preferred candidate in both elections. Similarly, Hispanic voters are extremely cohesive in both elections, and share the same candidate of choice as Black voters. However, only a minority of White voters in both elections support the Black and Hispanic preferred candidate, and large majorities of White voters supported the opposing candidate in each election.

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[1]In New York City, voting precincts are called "election districts." To avoid confusion with congressional districts, I refer to them by precincts in this report.

[2]https://vote.nyc/page/election-results-summary

[3]https://www.nyc.gov/content/planning/pages/resources/datasets/election-districts

[4]The 95% confidence interval is a measure of uncertainty in the estimates from the model. For example, the model might estimate that 94% of the members of a group voted for a particular candidate, with a 95% confidence interval of 91-96%. This means that based on the data and the model assumptions, 95% of the simulated estimates for this group fall in the range of 91-96%, with 94% being the average value. Larger confidence intervals reflect a higher degree of uncertainty in the estimates, while smaller confidence intervals reflect less uncertainty.
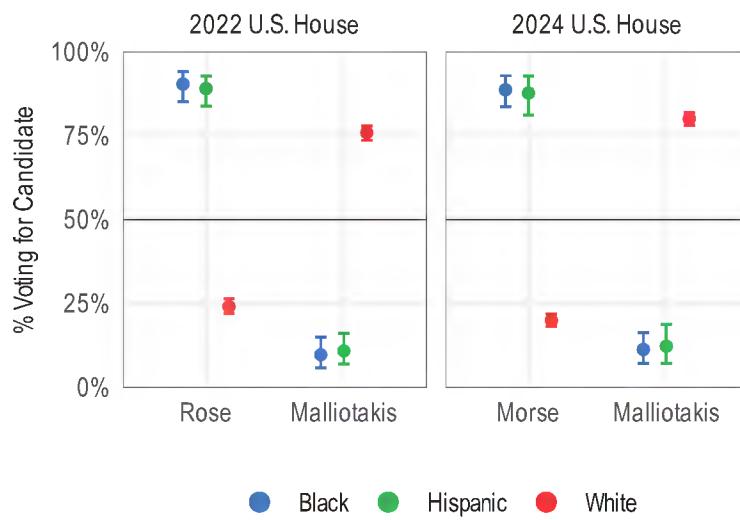
Figure 1: Racially Polarized Voting Estimates for U.S. House Races, CD 11

16. Figure 2 presents the results for all 20 elections. For each election, I first identified the Black and Hispanic preferred candidate in each contest, and include only the results for that candidate.[5]

17. Figure 2 shows that Black voters are extremely cohesive, with a clear preferred candidate in all 20 elections. On average, Black voters supported their preferred candidates with 90.5% of the vote.

18. Figure 2 shows that Hispanic voters also vote cohesively, and support the same candidates as Black voters. Hispanic voters have a clear preferred candidate in all 20 elections. On average, Hispanic voters supported their preferred candidates with 87.7% of the vote.

19. Figure 2 also shows that White voters are highly cohesive in voting in opposition to the Black and Hispanic-preferred candidates in every election. On average, White voters supported Black and Hispanic-preferred candidates with 26.3% of the vote. Figure 2 thus demonstrates a consistent pattern of racially polarized voting in the 11th Congressional District.

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[5]Full results for each election are presented in Table 1.

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