

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

ONE WISCONSIN INSTITUTE, INC., *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

GERALD C. NICHOL, *et al.*,

Defendants.

**DR. KENNETH MAYER'S DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTIONS IN LIMINE**

Pursuant to 20 U.S.C. § 1746, I, Dr. Kenneth Mayer, hereby declare

1. I verified the accuracy of the race estimates provided by Dr. Ghitza and Catalist by comparing those estimates with the race data contained in the records maintained by the Wisconsin Department of Transportation. I found Dr. Ghitza's estimates to be 95.7 percent accurate.

2. For the errors I found, they were largely instances of misclassifying Hispanics and African Americans as white. These would skew the results in Defendants' favor because the number of African Americans and Hispanics impacted by the challenged provisions would be underreported.

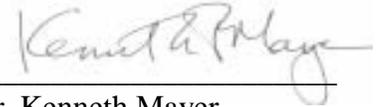
3. I only relied on Catalist race estimates for registrants who did not match to the Department of Transportation database, which contained self-identified race information.

4. In conducting my analysis, registrants whose racial estimates had a confidence score less than 50 percent were counted as having a race of "unknown," and although I included

them in the turnout models, I did not estimate any race-specific effects for this category. There were approximately 13,000 such voters out of approximately 3.4 million records I analyzed.

5. I provided Plaintiffs' counsel with a list of scholarly articles and research papers that cite and rely upon Catalist's data. Catalist's data is widely used by scholars and researchers and is considered reliable.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 9, 2016.



Dr. Kenneth Mayer