

**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. YAIR GHITZA'S DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTIONS IN LIMINE**

Pursuant to 20 U.S.C. § 1746, I, Dr. Yair Ghitza, hereby declare

1. Catalist, LLC utilizes geocoding services provided by a number of third-party vendors. Utilizing multiple vendors allows Catalist to maximize the number of addresses with a known geocode.

2. The array of geocoding services Catalist utilizes is a confidential trade secret that would harm its business if disclosed. For this reason, Catalist prefers not to reveal the companies through which it obtains these services. If the identity of Catalist's vendors is important to this the resolution of this motion, I will provide those identities under seal.

3. Geocoding services involve Catalist obtaining the geocode values and geocode accuracy associated with the addresses from outside vendors. The software that assigns geocodes belongs to the vendors and is not owned by Catalist. For this reason, Catalist cannot disclose the geocoding software.

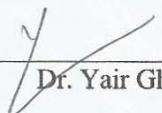
4. Catalist routinely verifies the accuracy of its race estimates for each of the 50 states in the U.S. and the District of Columbia. In Wisconsin, this process involves polling individuals about their race, which we use to confirm the accuracy of Catalist's estimates. Based on this process, Catalist has a 96 percent accuracy rate in Wisconsin.

5. For the errors that do occur, it is far more likely that an African American is misidentified as white than vice versa.

6. Of the 3.4 million voter records I analyzed in this case, 94.7 percent, or approximately 3.2 million, had confidence scores of 75 percent or greater.

7. Only 12,915 records had a confidence score below 50 percent, which is less than 0.4% of the records I analyzed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2016.



Dr. Yair Ghitza