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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

PICO NEIGHBORHOOD ASSOCIATION et al., Plaintiffs, v. CITY OF SANTA MONICA and DOES 1-100, Defendants.	CASE NO. BC 616804 **DECLARATION OF DR. JEFFREY B. LEWIS IN SUPPORT OF DEFENDANT'S EX PARTE APPLICATION** Action Filed: April 12, 2016 Trial Date: August 1, 2018 Assigned to Hon. Yvette M. Palazuelos

DECLARATION OF DR. JEFFREY B. LEWIS

I, Dr. Jeffrey B. Lewis, declare as follows:

I am a Professor of Political Science at the University of California, Los Angeles (UCLA), Political Science Department, Bunche Hall Office 3371, Los Angeles, California. The following matters are based upon my personal knowledge and if called to testify to such facts, I could and would do so competently.

1.   My background and qualifications are set forth in my curriculum vitae, which was admitted in the trial of this action as Exhibit 1756. In short, I am a Professor of Political Science at UCLA and the recent past department chair of UCLA's political science department, as well as past president of the Society for Political Methodology. I have been a member of the UCLA faculty since 2001. Before joining the UCLA faculty, I served as Assistant Professor of Politics and Public Affairs at Princeton University from 1998 to 2001. I earned a Bachelor of Arts (BA) in Political Science and Economics from Wesleyan University in 1990 and a Doctor of Philosophy (Ph.D) degree in Political Science from Massachusetts Institute of Technology (MIT) in 1998. My main area of specialization is political methodology with a focus on making inferences about preferences and behavior from the analysis of voting patterns in the mass public and in legislatures.

2.   I testified at the trial in this action regarding, among other things, the use of the Ecological Regression (ER) and Ecological Inference (EI) methodologies to generate estimates of support for candidates running for the City Council and other public offices in Santa Monica, among voters belonging to certain racial/ethnic groups, including estimates of the uncertainty and confidence associated with these estimates.

3.   Following the conclusion of the trial, the City of Santa Monica held an election for its City Council on November 6, 2018, in which seven candidates ran for three open seats. The three winners—i.e., the three candidates receiving the highest vote totals—were Sue Himmelrich, Greg Morena, and Kevin McKeown.

4.   I was asked to, and did, generate estimates of support for candidates running for the November 2018 Santa Monica City Council election using the same weighted-ER methodology that I used to analyze other elections in this case, and about which I testified at trial.

5. Based upon a weighted-ER analysis, I estimate that the three winning candidates received the three highest shares of Latino votes (by point estimates). As estimated by weighted-ER, approximately 70% of Latino voters cast ballots for Mr. McKeown; approximately 63% of Latino voters cast ballots for Mr. Morena; and approximately 62% of Latino voters cast ballots for Ms. Himmelrich. Those three candidates are also estimated to have received the highest share of African-American and White votes (again by point estimate). These results are set forth in the below figure:

Weighted ER estimates of support for 2018 SM City Council candidates
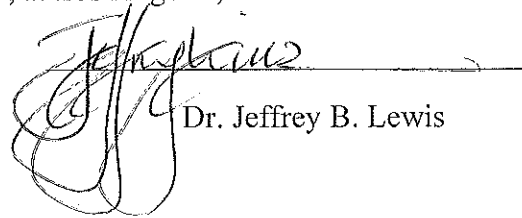
Candidate	Asian		Black		Latinx		White	
	Est.	(SE)	Est.	(SE)	Est.	(SE)	Est.	(SE)
Himmelrich	-0.6	31.7	53.8	13.8	61.6	9.7	52.7	2.3
Morena	16.2	26.8	34.5	11.6	63.2	8.2	41.9	2.0
McKeown	0.5	35.5	30.5	15.4	69.5	10.8	41.0	2.6
O'Connor	51.4	15.7	4.8	6.8	44.5	4.8	21.1	1.1
Powell	22.7	17.0	21.5	7.4	33.5	5.2	20.5	1.2
Bellomo	34.6	33.7	21.5	14.6	-15.1	10.3	19.7	2.5
Neri	38.5	26.4	21.9	11.4	-13.9	8.0	15.1	1.9

6. I obtained the voting data for this analysis from the Los Angeles County Registrar/Recorder's "Official Statement of Votes Cast" for the City of Santa Monica in the November 6, 2018 election. The data collected include the total number of ballots cast and the number of votes cast for each candidate in each voting precinct. I merged this information with data on voter registration by race and ethnicity downloaded from the Statewide Database, which is the official database used by the State of California for redistricting. In particular, the Statewide Database tabulates the number of voters whose surnames appear on a list of Chinese, Filipino/a, Indian, Japanese, Korean, Vietnamese, and Latino/a surnames to approximate the number of Asians and Latinos/as who were registered and who voted in each precinct in a given election. I imputed the fraction of registrants and voters who were African American and white using data from the Census's American Community Survey (these data were also obtained from the Statewide Database). Although the Statewide Database's ethnic breakdowns of registrants by precinct are not yet available for the November 2018 election, they are available for the June 2018 primary election, which I used to perform my analysis. It would be preferable to base the weighted-ER estimates on the ethnic composition of those in each precinct who voted in the November 2018 election rather than on the composition of those who were

registered in each precinct. However, based on my experience, my professional opinion is that it is highly unlikely that either the estimates presented above or the conclusions drawn from those estimates are materially affected by the use of the Statewide Database's demographic data for June 2018 registrants rather than the forthcoming demographic data for November 2018 voters. For this reason, I have confidence in the results of my analysis.

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

Executed this 27 day of February, 2019, at Los Angeles, California.

Dr. Jeffrey B. Lewis

DECLARATION OF DR. JEFFREY B. LEWIS

Gibson, Dunn &
Crutcher LLP