

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Laura Boustani, Mutsuyo Okumura Unger,	)	
Chia-Min T. Chen, Mary Savas, Efty	)	
Simakis, Sophia Loizos, Paramjit Singh,	)	
Joseph Hajjar, Catherine Ma, Sagarika	)	
Nayak, Eduardo A. Romero, Karil	)	
Bialostosky, Dagmar Celeste, Ali AlHaddad	)	
MD, Sawsan Alhaddad MD, Gia Hoa Ryan,	)	
Margaret Wong, P.S. Murthy, Asian	)	
American Bar Association of Ohio, The	)	
Federation of India Community Association,	)	
Service Employees International Union	)	
District 1199, American-Arab Anti-	)	Civil Action No. 06-2065
Discrimination Committee, Greater Toledo	)	
Association of Arab Americans, Council on	)	
American-Islamic Relations Ohio,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
J. Kenneth Blackwell,	)	
	)	
Defendant.	)	

---

DECLARATION OF MARK SALLING

DECLARATION OF MARK J. SALLING, Ph.D.

I, Mark J. Salling, being of legal age and sound mind, do hereby declare and state:

(1) I am the director of the Northern Ohio Data and Information Service (NODIS), in the Maxine Goodman Levin College of Urban Affairs, Cleveland State University (CSU). NODIS is an applied research and public service center in the Urban College, providing research, data, and geographic information systems expertise to the community. NODIS is a Census Bureau affiliate. I am a Fellow in the Urban College and teach in the Department of Urban Studies as a secondary responsibility. I am also an Affiliated Scholar in CSU's Center for Election Integrity. I have been at Cleveland State University since 1982. A true and correct copy of my vita is attached as Exhibit A to this declaration.

(2) I manage a team of researchers, programmers, and student employees involved in data dissemination, demographic analysis, and urban and geographic information systems (GIS) applications. In this capacity, I have developed widely recognized expertise in demographics in the state and northeast Ohio. I also have experience in election demographics and administrative procedures related to reapportionment and redistricting. This work includes the application of database and GIS technologies in election geography management.

(3) Via contract with the State of Ohio, I led projects to develop the database used for the redistricting of Ohio's congressional and General Assembly districts in both 1991 and 2001. The more recent redistricting database project, initiated in 1996 and completed in 2001, included working with Ohio county Boards of Elections in many critical tasks including re-drawing precinct boundaries, coordinating local boundary delineation and the Census Bureau's

geographic database development, estimating population and demographic data for non-census political and administrative units, and training county boards of elections in the use of a computer-based redistricting system. Under my direction, NODIS also served for four years as a consultant for the Cuyahoga County (Cleveland and suburbs) Board of Elections on database and GIS applications for its elections administration and management operations, and served similar functions for the Summit County elections board. My analytical expertise was also utilized in a federal court case concerning the racial disparities associated with various voting technologies. I have provided additional data and analysis concerning the socioeconomic and racial implications of the November 2004 election's provisional balloting rates in Cuyahoga County, and recently estimated the number of registered voters and likely voters in Ohio with a driver's license having a past home address that may result in challenges to their voting if poll workers are not aware of the acceptability of such an address on these documents.

(4) I hold numerous leadership positions concerning the use of census data. I am designated as the state's liaison with the Census Bureau on redistricting database development and I chair the Cleveland region's Census statistical areas committee.

(5) I have published papers dealing with computer applications in planning, data dissemination, geographic information systems, poverty, residential mobility, environmental equity, and demography. I have taught courses on Geographic Information Systems, urban geography, urban spatial systems, statistical and computer methods, and demography at Cleveland State University.

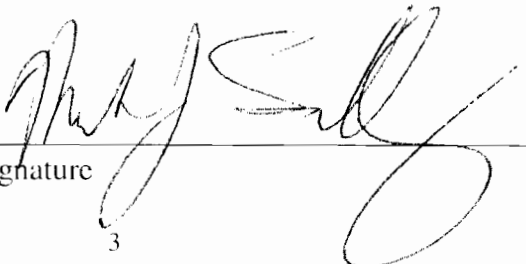
(6) With assistance from a staff member, Ellen Cyran, I have prepared tabulations and graphs of census data on the naturalized population, age 18 and older, in the state and attach these in a document found as Exhibit B to this declaration. These tables report data from both the 2000

decennial census Public Use Microdata Sample (2000 Census PUMS) and the 2004 American Community Survey (ACS) Public Use Microdata Sample (2004 ACS PUMS). Though more recent, the ACS data are based on a much smaller sample than the 2000 Census PUMS, and thus for the 2004 data there is enough range in the upper and lower bounds of possible values using a 90 percent confidence level that one should interpret the data with great care. The 2005 ACS data are due for release by the Census Bureau later in this month (August 2006) and, based on a much larger sample size than the 2004 data, will provide more reliable results. That said, the estimated counts and percentages for 2004 are generally consistent with the very reliable 2000 Census PUMS results, thus giving credibility to the 2004 estimates.

(7) The tables report the estimates of counts (number of persons) and percentage distributions of the counts. The margin of error and the upper and lower bounds of the estimates at the 90 percent confidence level are also shown (along with the standard error which is used in calculating the margin of error and thus the confidence interval). Interpretation of these values is as follows: the upper and lower bounds indicate that one can be 90 percent confident that, if one measured data from the entire population, the actual value would fall somewhere between the high and low bounds reported in the table.

(8) All together there were an estimated 165,056 naturalized citizens in the state in 2000, or 2.0 percent of the citizen population; there was an estimated 177,362 naturalized citizens or 2.2 percent of all citizens, in the state in 2004. The 2004 ACS does not include persons living in group quarters.

(9) I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 4<sup>th</sup> day of August, 2006, in Cleveland, Ohio.

Signature 

3

# **Selected Characteristics of Ohio's Naturalized Population Age 18 or Older**

Prepared by

Mark Salling, Ph.D., Director  
Northern Ohio Data & Information Service (NODIS)  
Maxine Goodman Levin College of Urban Affairs  
and  
Associated Researcher  
The Center for Election Integrity

and

Ellen Cyran, Programmer/Senior Analyst  
Northern Ohio Data & Information Service (NODIS)

Cleveland State University

August 4, 2006



## Sources of Data

2000 Public Use Microdata Sample, U.S. Bureau of the Census

2004 American Community Survey, Public Use Microdata Sample, U.S. Bureau of the Census

Note: The 2004 ACS does not include persons living in group quarters.

**Table 1: Naturalized Citizens**

*U.S. Citizens 18 years and over*

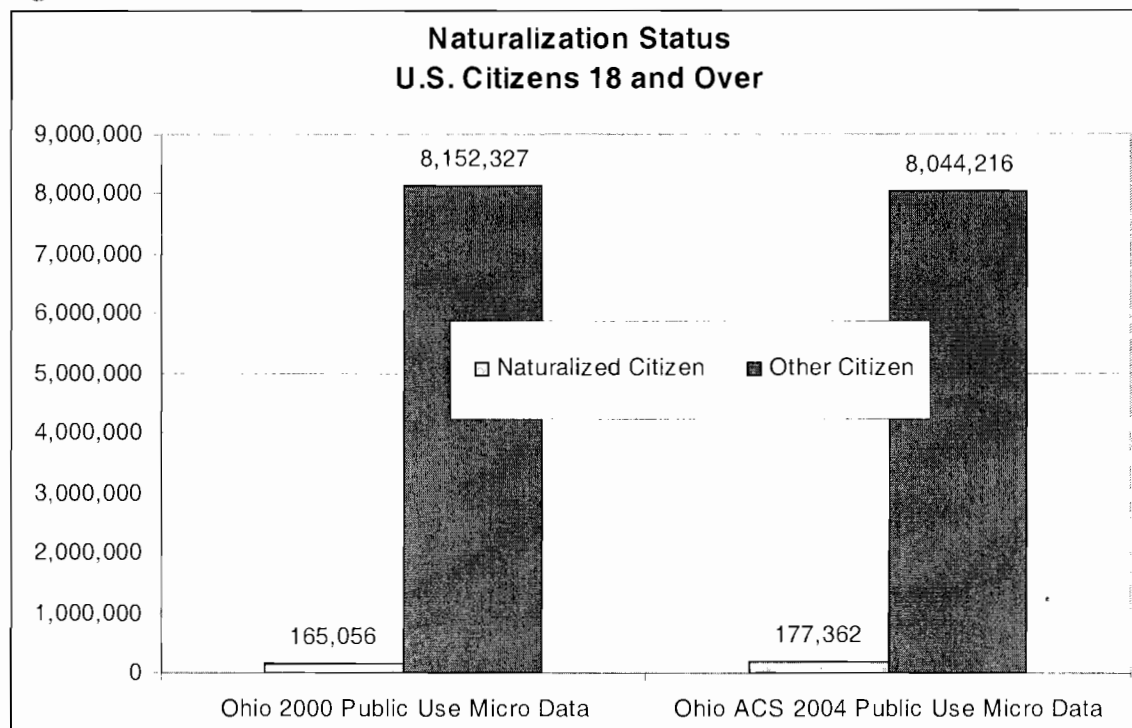
### Ohio 2000 Public Use Micro Data

Naturalization Status	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Naturalized Citizen	165,056	2,813	4,641	160,415	169,697	2.0	0.0	0.1	1.9	2.0
Other Citizen	8,152,327	10,574	17,447	8,134,880	8,169,774	98.0	0.0	0.1	98.0	98.1
Total	8,317,383					100.0				

### Ohio ACS 2004 Public Use Micro Data

Naturalization Status	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Naturalized Citizen	177,362	17,327	28,590	148,772	205,952	2.2	0.2	0.3	1.8	2.5
Other Citizen	8,044,216	63,499	104,774	7,939,442	8,148,990	97.8	0.2	0.3	97.5	98.2
Total	8,221,578					100.0				

**Figure 1: Naturalized Citizens**



**Table 2: Age in Major Ranges**  
*Naturalized U.S. Citizens 18 years and over*

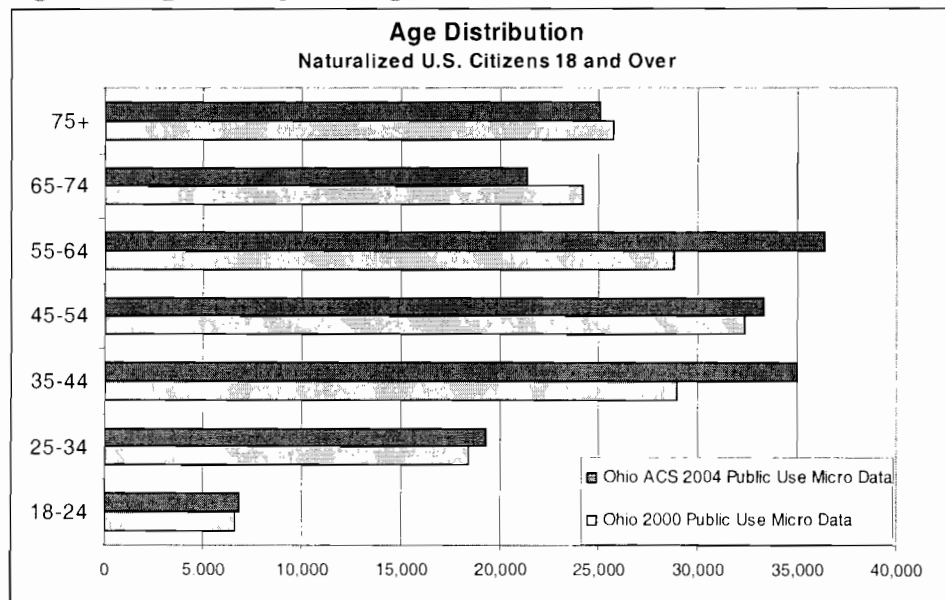
*Ohio 2000 Public Use Micro Data*

Age Group	Estimated Persons	90% Confidence				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
18-24	6,594	566	934	5,660	7,528	4.0	0.3	0.6	3.4	4.5
25-34	18,403	945	1,560	16,843	19,963	11.1	0.5	0.9	10.3	12.0
35-44	28,958	1,185	1,956	27,002	30,914	17.5	0.7	1.1	16.5	18.6
45-54	32,366	1,253	2,067	30,299	34,433	19.6	0.7	1.1	18.5	20.7
55-64	28,803	1,182	1,951	26,852	30,754	17.5	0.7	1.1	16.4	18.5
65-74	24,222	1,084	1,789	22,433	26,011	14.7	0.6	1.0	13.7	15.7
75+	25,710	1,117	1,843	23,867	27,553	15.6	0.6	1.0	14.5	16.6
Total	165,056					100.0				

*Ohio ACS 2004 Public Use Micro Data*

Age Group	Estimated Persons	90% Confidence				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
18-24	6,822	576	950	5,872	7,772	3.8	0.3	0.5	3.3	4.4
25-34	19,314	968	1,598	17,716	20,912	10.9	0.5	0.9	10.0	11.8
35-44	35,040	1,303	2,151	32,889	37,191	19.8	0.7	1.1	18.6	20.9
45-54	33,334	1,271	2,098	31,236	35,432	18.8	0.7	1.1	17.7	19.9
55-64	36,373	1,328	2,191	34,182	38,564	20.5	0.7	1.1	19.4	21.7
65-74	21,383	1,019	1,681	19,702	23,064	12.1	0.6	0.9	11.1	13.0
75+	25,096	1,104	1,821	23,275	26,917	14.1	0.6	1.0	13.2	15.1
Total	177,362					100.0				

**Figure 2: Age in Major Ranges**

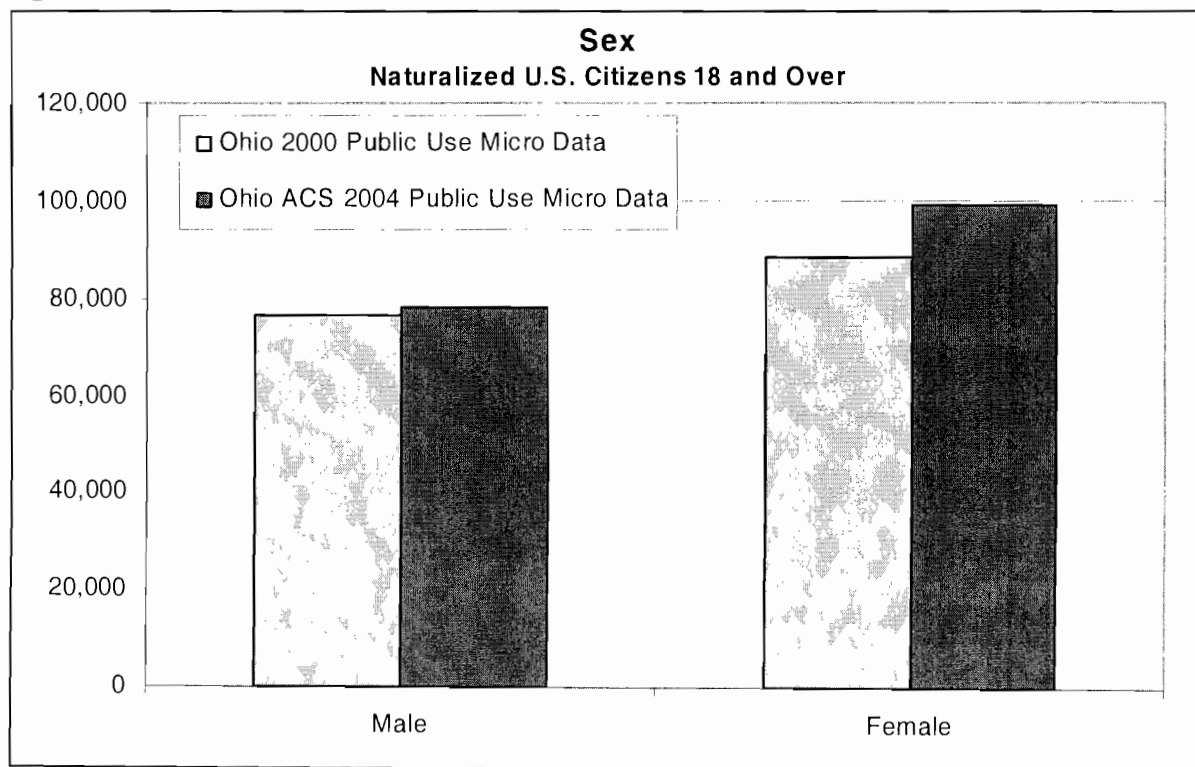


**Table 3: Sex***Naturalized U.S. Citizens 18 years and over***Ohio 2000 Public Use Micro Data**

Sex	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Male	76,396	1,921	3,170	73,226	79,566	46.3	0.9	1.4	44.9	47.7
Female	88,660	2,069	3,413	85,247	92,073	53.7	0.9	1.4	52.3	55.1
Total	165,056					100.0				

**Ohio ACS 2004 Public Use Micro Data**

Sex	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Male	78,282	11,562	19,077	59,205	97,359	44.1	35.2	58.2	-14.0	102.3
Female	99,080	12,995	21,442	77,638	120,522	55.9	35.2	58.2	-2.3	114.0
Total	177,362					100.0				

**Figure 3: Sex**



**Table 4: Race and Hispanic Origin**

*Naturalized U.S. Citizens 18 years and over*

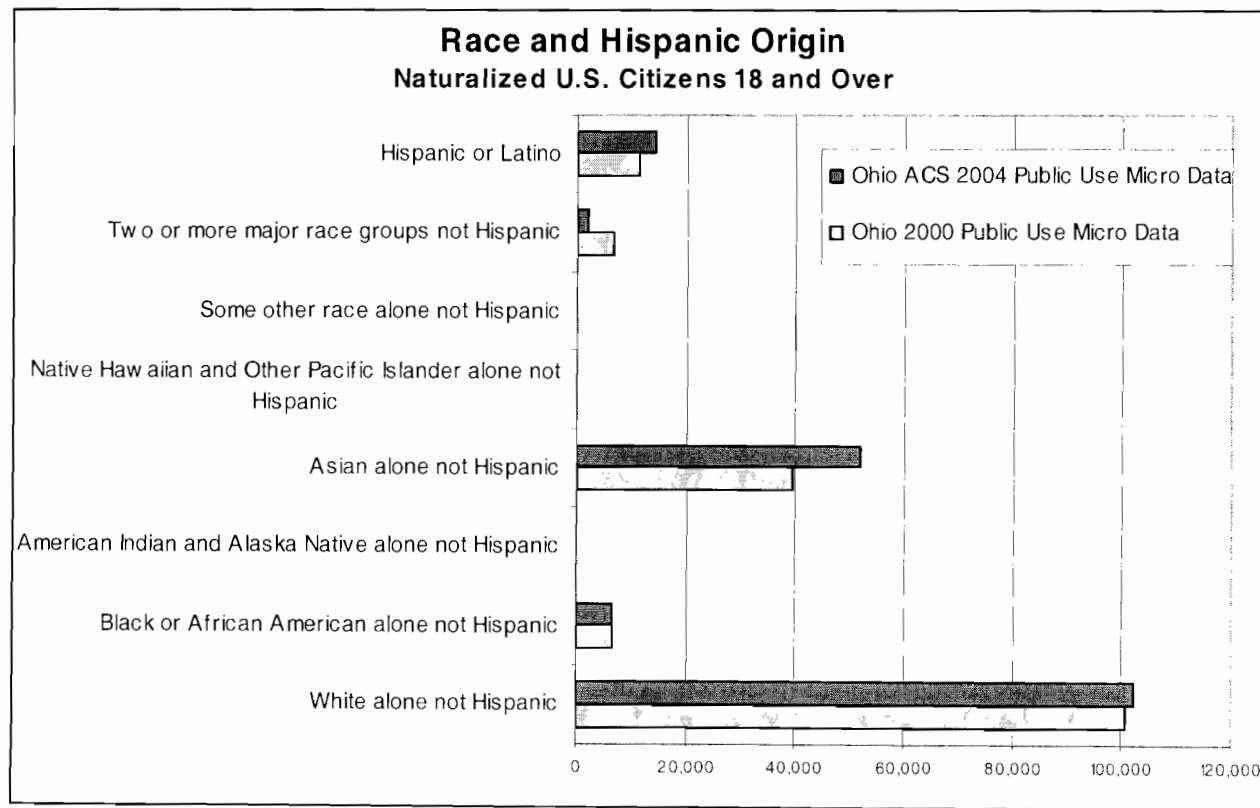
**Ohio 2000 Public Use Micro Data**

Race/Hispanic Group	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
White alone not Hispanic	100,827	2,756	4,547	96,280	105,374	61.1	1.0	1.7	59.4	62.8
Black or African American alone not Hispanic	6,709	714	1,178	5,531	7,887	4.1	0.4	0.7	3.4	4.8
American Indian and Alaska Native alone not Hispanic	183	118	195	0	378	0.1	0.1	0.1	0.0	0.2
Asian alone not Hispanic	39,305	1,725	2,847	36,458	42,152	23.8	0.9	1.5	22.3	25.3
Native Hawaiian and Other Pacific Islander alone not Hispanic	132	100	165	0	297	0.1	0.1	0.1	0.0	0.2
Some other race alone not Hispanic	340	161	265	75	605	0.2	0.1	0.2	0.0	0.4
Two or more major race groups not Hispanic	6,418	698	1,152	5,266	7,570	3.9	0.4	0.7	3.2	4.6
Hispanic or Latino	11,142	920	1,518	9,624	12,660	6.8	0.5	0.9	5.9	7.6
Total	165,056					100.0				

**Ohio ACS 2004 Public Use Micro Data**

Race/Hispanic Group	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
White alone not Hispanic	102,371	13,207	21,792	80,579	124,163	57.7	77.5	127.9	-70.2	185.6
Black or African American alone not Hispanic	6,569	3,360	5,544	1,025	12,113	3.7	29.6	48.9	-45.2	52.6
American Indian and Alaska Native alone not Hispanic	260	669	1,103	0	1,363	0.1	6.0	9.9	-9.8	10.1
Asian alone not Hispanic	51,683	9,406	15,519	36,164	67,202	29.1	71.3	117.7	-88.5	146.8
Native Hawaiian and Other Pacific Islander alone not Hispanic	0	0	0	0	0	0.0	0.0	0.0	0.0	0.0
Some other race alone not Hispanic	204	592	977	0	1,181	0.1	5.3	8.8	-8.7	8.9
Two or more major race groups not Hispanic	1,826	1,772	2,924	0	4,750	1.0	15.8	26.1	-25.1	27.2
Hispanic or Latino	14,449	4,982	8,219	6,230	22,668	8.1	42.9	70.8	-62.7	79.0
Total	177,362					100.0				

**Figure 4: Race and Hispanic Origin**

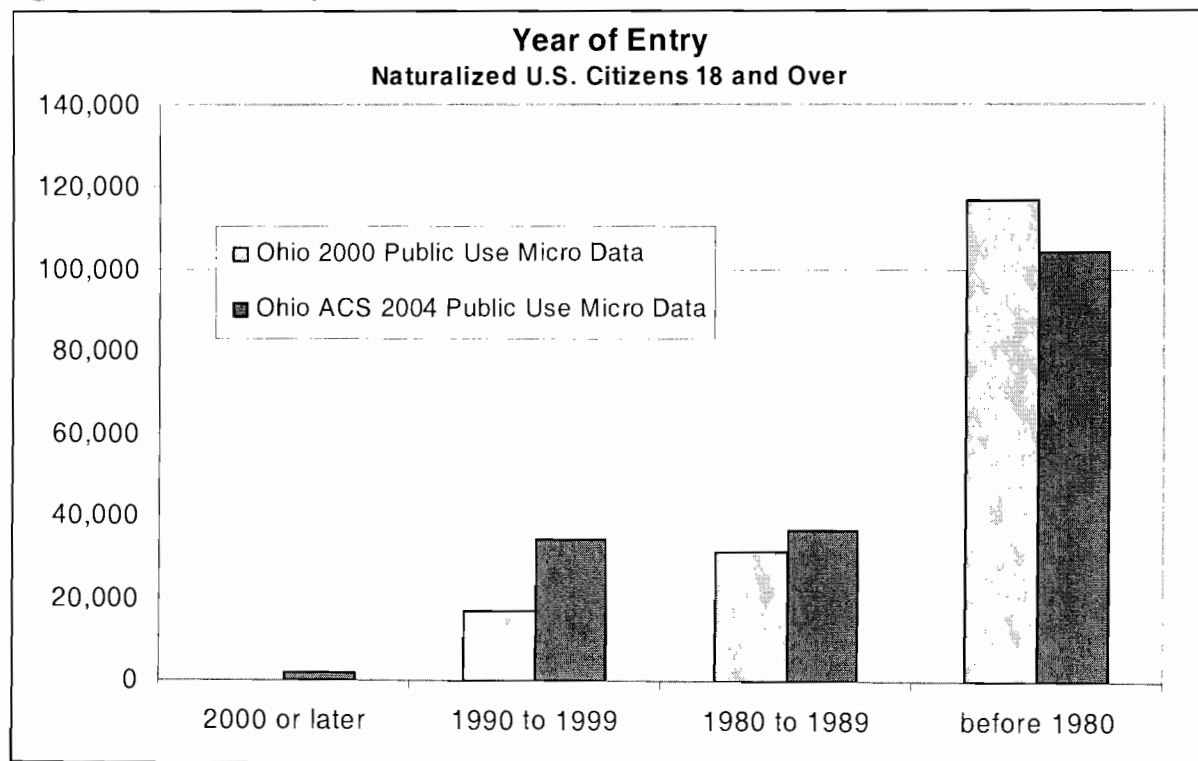


**Table 5: Year of Entry to U.S.***Naturalized U.S. Citizens 18 years and over**Ohio 2000 Public Use Micro Data*

Year of Entry	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
2000 or later	109	73	120	0	229	0.1	0.0	0.1	0.0	0.1
1990 to 1999	16,807	903	1,491	15,316	18,298	10.2	0.5	0.9	9.3	11.0
1980 to 1989	31,498	1,236	2,039	29,459	33,537	19.1	0.7	1.1	18.0	20.2
before 1980	116,642	2,370	3,910	112,732	120,552	70.7	0.8	1.3	69.4	72.0
Total	165,056					100.0				

*Ohio ACS 2004 Public Use Micro Data*

Year of Entry	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
2000 or later	2,018	1,863	3,073	0	5,091	1.1	7.0	11.6	-10.5	12.7
1990 to 1999	34,137	7,650	12,623	21,514	46,760	19.2	26.1	43.1	-23.9	62.4
1980 to 1989	36,904	7,953	13,123	23,781	50,027	20.8	26.9	44.4	-23.6	65.2
before 1980	104,303	13,330	21,995	82,308	126,298	58.8	32.6	53.9	5.0	112.7
Total	177,362					100.0				

**Figure 5: Year of Entry to U.S.**

**Table 6: Continent of Birth***Naturalized U.S. Citizens 18 years and over**Ohio 2000 Public Use Micro Data*

Continent	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Africa	6,412	558	921	5,491	7,333	4	0	1	3	4
Asia	51,698	1,582	2,611	49,087	54,309	31.3	0.8	1.3	30.0	32.6
Europe	83,779	2,011	3,318	80,461	87,097	50.8	0.9	1.4	49.3	52.2
Latin America	15,501	868	1,432	14,069	16,933	9.4	0.5	0.8	8.6	10.2
Northern America	7,206	592	977	6,229	8,183	4.4	0.4	0.6	3.8	4.9
Oceania	460	150	247	213	707	0.3	0.1	0.1	0.1	0.4
Total	165,056					100.0				

*Ohio ACS 2004 Public Use Micro Data*

Continent	Estimated Persons	90% Confidence Interval				Percent of Total	90% Confidence Interval			
		Standard Error	Margin of Error	Lower Bound	Upper Bound		Standard Error	Margin of Error	Lower Bound	Upper Bound
Africa	6,506	3,344	5,517	989	12,023	4	2	3	1	7
Asia	70,592	10,983	18,122	52,470	88,714	39.8	4.8	8.0	31.8	47.8
Europe	76,337	11,418	18,840	57,497	95,177	43.0	4.9	8.0	35.0	51.1
Latin America	17,692	5,511	9,094	8,598	26,786	10.0	3.0	4.9	5.1	14.8
Northern America	6,061	3,228	5,326	735	11,387	3.4	1.8	3.0	0.5	6.4
Oceania	174	547	903	-729	1,077	0.1	0.3	0.5	-0.4	0.6
Total	177,362					100.0				

**Figure 6: Continent of Birth**