

## EXHIBIT 4

# COMPARATOR ANALYSIS OF UNDER-VOTE PATTERNS ACROSS THE ILLINOIS HOUSE OF REPRESENTATIVES

*Data from the November 5, 2024 General Election*

*Filed in support of Plaintiff's Emergency Motion for Temporary Restraining Order and Preliminary Injunction in Leavitt v. Illinois State Board of Elections, et al.*

*Case No. 2026CH000024, Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois.*

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### A. SOURCE

The data analyzed in this Exhibit are drawn entirely from the certified results published by the Illinois State Board of Elections for the November 5, 2024 general election. Precinct-level result files for the nine House Districts examined in detail (HD-89, HD-90, HD-70, HD-100, HD-102, HD-110, HD-117, HD-78, and HD-113) were downloaded directly from the State Board's public website at <https://www.elections.il.gov/electionoperations/ElectionVoteTotals.aspx>. Statewide aggregate figures for all 118 House Districts are drawn from the same source. Each precinct-level file provides registered voters, votes cast for each named candidate, Under Votes, Blank Ballots, and Over Votes for the State Representative contest in that district.

### B. METHODOLOGY

For each district analyzed, this Exhibit aggregates the precinct-level rows or the certified district totals to produce two figures:

- **Ballots cast in the contest:** the sum of candidate votes, Under Votes, Blank Ballots, and Over Votes across all precincts in the district.
- **Under-vote rate:** the number of Under Votes divided by ballots cast in the contest, expressed as a percentage. This is the conventional definition used in election administration. For HD-89, it produces the 17.49% figure pleaded in paragraph 10 of the Verified Complaint.

A district is classified as “uncontested” if only one major-party candidate appeared on the general election ballot. Three Democratic-uncontested districts (HD-29, HD-42, HD-60) had token write-in candidates with general-election vote totals between 10 and 198 votes against incumbents who received 21,000 to 38,000 votes; these are classified as uncontested because no two-party general-election contest was conducted (only one name appeared on the ballot).

One contested race in the comparator set, HD-87, included an independent candidate (David Gill) on the general election ballot.

**C. STATEWIDE CONTEXT: NEARLY HALF OF ALL ILLINOIS HOUSE DISTRICTS HAD NO GENERAL-ELECTION CONTEST IN 2024**

In the November 2024 general election, **58 of 118 Illinois House Districts (49.2%) were uncontested.** In each of these districts, the State Representative line on the general election ballot offered no two-party choice.

Status	Number of districts	Percentage of chamber
Uncontested (Democratic)	35	29.7%
Uncontested (Republican)	23	19.5%
<b>Total uncontested</b>	<b>58</b>	<b>49.2%</b>
Contested	60	50.8%
<b>Total</b>	<b>118</b>	<b>100%</b>

The 17.5% under-vote rate documented for HD-89 in paragraph 10 of the Verified Complaint is therefore not a local anomaly. It is one observation within a Statewide pattern affecting voters in 57 additional districts in the same election cycle. The empirical analysis that follows examines that pattern through nine House Districts selected to span the geographic, partisan, and demographic range of the affected electorate.

## D. THE NINE-DISTRICT COMPARATOR SET

The nine districts listed below are the focus of the precinct-level analysis in this Exhibit. They were selected to test whether the under-vote signature documented in HD-89 reflects a structural feature of uncontested Illinois House races or a local idiosyncrasy of the district at issue. In the Appendix, these nine districts have a unique designator so that they stand out from the remaining districts that also appear on the map.

<b>District</b>	<b>Status</b>	<b>Incumbent (party)</b>	<b>Prec.</b>	<b>Ballots</b>	<b>Under</b>	<b>UV %</b>
HD-89	Uncontested	Tony McCombie (R)	120	59,136	10,342	<b>17.49%</b>
HD-90	Uncontested	John Cabello (R)	86	54,167	12,784	<b>23.60%</b>
HD-100	Uncontested	C.D. Davidsmeyer (R)	154	60,308	9,515	<b>15.78%</b>
HD-102	Uncontested	Adam Niemerg (R)	153	54,556	7,505	<b>13.76%</b>
HD-110	Uncontested	Blaine Wilhour (R)	129	51,310	7,691	<b>14.99%</b>
HD-117	Uncontested	Patrick Windhorst (R)	133	52,997	5,803	<b>10.95%</b>
HD-78	Uncontested	Camille Lilly (D)	70	53,766	9,751	<b>18.14%</b>
HD-113	Uncontested	Jay Hoffman (D)	88	50,424	10,387	<b>20.60%</b>
HD-70	Contested	Keicher (R) v. Olson (D)	92	62,656	1,831	<b>2.92%</b>

The eight uncontested districts in the comparator set produced under-vote rates ranging from 10.95% to 23.60%. The single contested district (marked with a green outline in the Appendix) produced an under-vote rate of 2.92%. The lowest uncontested rate (HD-117) is 3.7 times the contested rate. The highest uncontested rate (HD-90) is 8.1 times the contested rate. The contested-uncontested gap is not a function of any single district's idiosyncratic characteristics. It operates at consistent magnitude across the geographic range of the State.

All remaining uncontested races across the state are marked in the Appendix with red or blue outlines, along with the House District number.

**E. THE BOONE COUNTY CONTROL: HD-89 v. HD-90**

House District 89 and House District 90 each include three precincts in Boone County. Both districts had Republican incumbents on the ballot in November 2024 with no Democratic challenger. The only material difference between the two cuts of Boone County is which incumbent appeared on the State Representative line:

District	Incumbent	Boone Prec.	Ballots	Cand. Votes	Under	UV %
HD-89	Tony McCombie (R)	3	1,006	818	188	<b>18.69%</b>
HD-90	John Cabello (R)	3	883	715	168	<b>19.03%</b>

The two rates differ by 0.34 percentage points. The candidate is not the variable that produces the under-vote signature. This finding addresses the principal alternative explanation Defendants may advance — that the under-vote in HD-89 reflects voter satisfaction with the incumbent rather than voter refusal to ratify a structurally uncompetitive ballot. The Boone County data show that the same refusal signature appears, at substantively identical magnitude, when a different incumbent is on the ballot in the same county on the same election day.

**F. THE CRACKED POPULATION CENTER: STEPHENSON COUNTY**

The 2021 redistricting assigned the City of Freeport to House District 90 rather than to House District 89, leaving the rural townships of Stephenson County in HD-89 (Verified Complaint ¶ 42). The 2024 election results produce the following county-level pattern within Stephenson County:

District	Steph. Prec.	Composition	Ballots	Under	UV %
HD-89	13	Rural townships only	6,051	824	<b>13.62%</b>
HD-90	27	Includes City of Freeport	15,146	3,854	<b>25.45%</b>

The five highest under-vote precincts within HD-90's Stephenson County cut:

<b>Precinct</b>	<b>Reg.</b>	<b>Ballots</b>	<b>Cand. Votes</b>	<b>Under</b>	<b>UV %</b>
FREEPORT 1	544	264	153	111	<b>42.05%</b>
FREEPORT 2	649	356	232	124	<b>34.83%</b>
FREEPORT 4	605	344	225	119	<b>34.59%</b>
FREEPORT 14	1,018	826	543	283	<b>34.26%</b>
FREEPORT 13	937	775	513	262	<b>33.81%</b>

Each of the five highest under-vote precincts in HD-90's Stephenson cut is a City of Freeport precinct. The carving of Freeport from Stephenson County produces a measurable refusal signature in the precincts comprising the cracked population center.

### **G. CROSS-PARTISAN AND CROSS-RACIAL CONFIRMATION**

The architectural-injury theory pleaded in Count III asserts that the same mechanism operates regardless of the party of the mapmaker, the party of the incumbent, or the racial composition of the affected voters (Verified Complaint ¶¶ 46–47). The 2024 record permits a direct test:

<b>District</b>	<b>Incumbent (party)</b>	<b>Geography</b>	<b>UV %</b>
HD-89	Tony McCombie (R)	Rural northwest IL, predominantly white	<b>17.49%</b>
HD-113	Jay Hoffman (D)	Madison, St. Clair, City of East St. Louis	<b>20.60%</b>
HD-78	Camille Lilly (D)	Chicago West Side, Oak Park	<b>18.14%</b>

The Democratic-uncontested HD-113, which includes the predominantly Black City of East St. Louis, produced an under-vote rate higher than the Republican-uncontested HD-89. The mapmakers in both districts were clearly favoring Democrats. The affected populations differ by race, by geography, and by partisan identification. The under-vote signature, however, does not differ by these characteristics. The signature is structural.

## **H. SCOPE OF THIS ANALYSIS: UNDER-VOTE DATA ONLY**

This Exhibit reports under-vote rates in the State Representative race only. It does not, and cannot, capture the asymmetric and far more complete collapse of democratic systems documented at the local level in the rural counties of the packed districts. The 94 vacant precinct committeeperson seats pleaded at paragraph 9 of the Verified Complaint, the absence of contested county board races across most of HD-89, and the structural disappearance of competitive municipal politics in small towns and townships throughout the seven counties at issue are the downstream consequences of the same architectural mechanism — but they produce no under-vote signature, because they produce no ballot at all.

The urban population centers that were carved out of these rural districts to engineer the State Representative packing — Freeport, Belvidere, Dixon, Oregon, Rockford — retain functioning local democracies: contested municipal elections, active party committees, candidate recruitment pipelines, and competitive county-level races. The rural counties surrounding them have lost all of these.

The under-vote data presented in this Exhibit is therefore a conservative measurement of structural disenfranchisement: it captures only what happens when voters are asked to ratify a one-name ballot, and not the far larger and more complete collapse of the local institutions that, before redistricting, would have produced ballots worth voting on at other levels below the State Representative line.

## **I. THE PARTISAN ASYMMETRY: REPUBLICAN-HELD SEATS ARE UNCONTESTED AT HIGHER RATES**

The architectural-injury theory predicts that, under map control by one party, the disadvantaged party's seats will be more structurally locked down than the advantaged party's seats. The 2024 record confirms this prediction.

Party	Seats held	Uncontested	Proportion uncontested
Democratic	78	35	44.9%
Republican	40	23	<b>57.5%</b>
Asymmetry			<b>12.6 points</b>

In Illinois, where Democrats have controlled the redistricting process since 2021, Republican-held seats are uncontested at 12.6 percentage points higher than Democratic-held seats. The disadvantaged party in the State's redistricting process is the party whose seats are more structurally uncontestable. This is the asymmetry pleaded at Verified Complaint ¶¶ 40–45 — operationalized in the State's own published election returns.

#### **J. BEYOND UNCONTESTED: 76 OF 118 DISTRICTS STRUCTURALLY DETERMINED**

The under-vote signature documented in the comparator analysis does not capture the full scope of the structural deficit. In addition to the 58 districts where no two-party general-election contest occurred, an additional 18 districts produced contested elections in which the winning candidate prevailed by a margin of 30 percentage points or greater. Such races are technically contested but are functionally equivalent to uncontested races: the outcome was structurally determined before any voter cast a ballot.

Category	Districts	Percentage of chamber
Uncontested	58	49.2%
Contested, won by 30%+ margin	18	15.3%
<b>Subtotal: structurally determined</b>	<b>76</b>	<b>64.4%</b>
Contested, won by 10–29% margin	29	24.6%
Contested, won by under 10% margin	12	10.2%
Data gap (HD-82)	1	0.8%
<b>Total</b>	<b>118</b>	<b>100%</b>

In 76 of the 118 districts of the Illinois House of Representatives — 64.4% of the chamber — the November 2024 general-election outcome was structurally determined before any voter cast a ballot. In only 12 districts (10.2% of the chamber) was the contest decided by a margin of less than 10 percentage points.

This is the empirical foundation of the architectural-injury claim. The under-vote signature documented in HD-89 is the most measurable manifestation of a structural pattern affecting two-thirds of the chamber.

## **K. NOTE ON DATA QUALITY**

For four districts in the precinct-level comparator set, the Illinois State Board of Elections published Registration values of zero for one or more counties: HD-100 (Greene, Morgan, Scott), HD-102 (Cumberland, Jasper), HD-110 (Fayette, Richland), and HD-117 (Johnson, Massac, White, Williamson). This appears to be a reporting limitation in the State's published files rather than a substantive feature of the underlying election. Because the under-vote rate in this analysis is calculated using ballots cast in the contest as the denominator (not registration), the missing registration data does not affect the under-vote rates reported in this Exhibit. It does affect any registration-denominated metric, and therefore no registration-denominated metric is reported in this Exhibit for those four districts.

For one district in the Statewide aggregation (HD-82), the published vote totals for the general election were not available in the source consulted at the time this Exhibit was prepared. HD-82 is included in the Statewide totals but excluded from the margin-of-victory categorization in Section I, where it appears as “Data gap.”

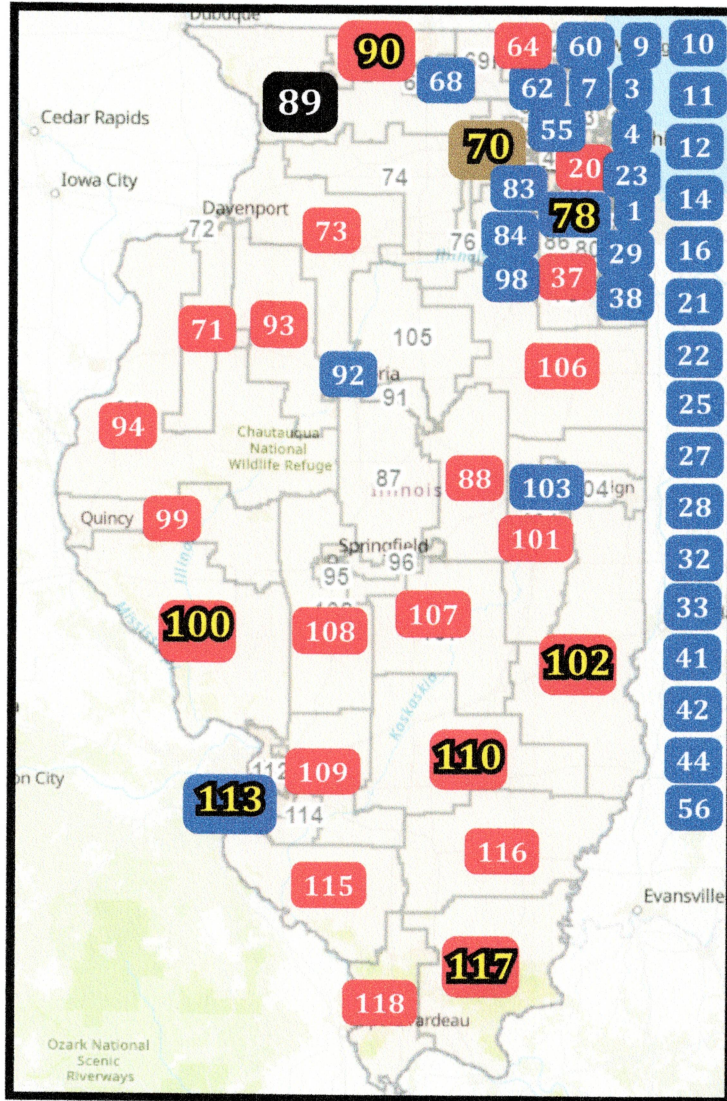
## **L. REPLICATION**

The aggregations reported in this Exhibit can be reproduced by any party from the publicly available Illinois State Board of Elections precinct-level result files and the certified district totals published at the same source. The Python script used to generate the figures in this Exhibit is available upon request.

# APPENDIX TO EXHIBIT 4 — MAP OF ILLINOIS HOUSE DISTRICTS

*Comparator Districts Identified — November 5, 2024 General Election*

- 89** The Plaintiff's Home District 89
- ##** Color scheme of analyzed districts    **##** Contested race
- ##** Color scheme uncontested Democratic race
- ##** Color scheme uncontested Republican race



*Respectfully submitted as Exhibit 4 to Plaintiff's Emergency Motion for Temporary Restraining Order and Preliminary Injunction, May 7, 2026.*

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