Representation of Non-Eligible Resident Populations in Legislative Bodies*

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Abstract

The Supreme Court's recent decision in the Evenwel vs. Abbott case has renewed interest representation of non-citizen populations in democracy. Normative questions about representation withstanding, how are non-citizens represented currently in the US. Districts are awarded to states for the US Congress based on resident population, where resident means a person who primarily sleeps in that place. That means that geographies with large immigrant populations get more representatives. These residents can not vote, which changes the incentive structure for political candidates. How does this manifest itself in the US?

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1   Introduction

The Supreme Court's recent decision in the Evenwel vs. Abbott case[1] has effectively raised an important question about the representation of non-citizen populations. Which residents should be represented in our legislative bodies? Should this representation be manifested through substantive or symbolically? How should the allocation of seats in these bodies be awarded; based on the number of people living within the jurisdiction, or the number of people eligible to vote? With the exception of some local level allowances for non-citizens to vote, Congress made it a crime for non-citizens to vote in federal elections in 1996 (Evia 2003).[2] Arguments for and against non-citizen voting rights have been well established in the literature (Neuman 1996, Kini 2005). Here, we are not interested in the normative question of non-citizen franchise, but of the consequences of representation for those without suffrage, and particularly how counting (or not counting) non-eligible residents affects representation of electorally marginalized groups.

Edmund Burke's classic notion of representation rejected the idea of distinct local interest and advocated for a "deliberative assembly of one nation" (Burke 1774). Normative democratic theories on what representation means or what a "representative body" should resemble have no consensus (Eulau et al 1959). "For aggregation alone, normative democratic theory demands only that power be exercised on behalf o particular interest bearers in proportion to their numbers in the population, not that is power be exercised by any particular mechanism" (Mansbridge 1999). Pitkin's (1967) typologies of representation shows that it can be provided in many forms: formalistic, descriptive, symbolic, and substantive. The institutional design features of single-member districts leads to distinct predictions of legislative outcomes and representation (Downs 1957, Gosnell 1948). Some scholars have viewed representation to be a collective good, where preferences may be represented by legislators not from a person's jurisdiction, as opposed to dyadic rep-

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[1]Hereafter, Evenwel

[2]The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 - Section 216. Criminal Penalty for Voting by Aliens in Federal Elections. It is unlawful for any alien to vote in any election for federal office. Violators can be fined and/or jailed for up to one year.

resentation where one legislator represents a set of constituents (Weissberg 1978). This view is more theoretically satisfying to the prospects of representing minority groups in the presence of single-member, majoritarian democracy. Yet other still contend that the all affected interest principle should apply; all persons, not just citizens, who have interests in the workings of the state, should have the right to participate (Dahl 1970[1990], Shapiro 1999). The *Logic of Collective Action* paints a more bleak picture of interest group formation, where only privileged groups will be able to achieve their collective good (Olson 1965). In this view, elite dominance can crowd the preferences of the many (Schattschneider 1960).

In this paper, we seek to fill a gap in the literature about representation of non-eligible voters in legislative bodies. The constitution is explicit in enunciating who has the right to vote, but lacks guidance to questions of representation. James Madison does suggest that legislators need "proper knowledge of the local circumstances of their numerous constituents" and that they "sympathize least with the feelings of the mass of the people, and be most likely to aim at a permanent elevation of the few on the depression of the many" (Federalist 55). From this, we can see some inclination from the founders for the need of legislators to be sufficiently close to their constituents, and his use of the work people suggests that he had both voters and non-voters in mind for who legislators should represent. The fourteenth amendment to the US Constitution requires that "Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State". A ruling in favor for the plaintiffs in Evenwel can determine how the court interprets this provision. If they interprets it narrowly, it will affect the distribution of legislative power. It clearly then is important to look at how those consequences will effect representation.

In a series of cases beginning with Baker vs Carr (1962), the Supreme Court demanded that state legislatures comply with the "one person, one vote" principle. In Wesberry vs. Sanders (1964), the court cited Georgia's Fifth district with 823,680 individuals and

the ninth district with its 272,154 as a gross example of malapportionment (Ladewig and Jasinski 2008). After the states adopted the necessary reforms, it became clear how apportionment of legislative seats affects the distribution of political power, and thus affects representation (Ansolabehere et al 2002). The current allocation of congressional seats is malappointed to some degree simply based on the fixed size of the US Congress (435 seats) and the uneven distribution of populations between states (Ladewig and Jasinski 2008). The distribution might become more skewed if states with high proportions of their population being non-eligible translates to lower amounts of seats.

Voting is the crucial element that affects representation in a democracy. Preferences are convey through routine elections. Two schools of thought have dominated the voting behavior literature. The first is spatial voting, which posits that candidates can be assigned a spot in a unidimensional space and voters choice the candidate that is nearest their own position in this space (Downs 1957, Buchanan and Tullock 1962). The alternative theory is derived from the work of Philip Converse at the University of Michigan which posits that voters don't hold ideologically consistent beliefs and that individual public opinion is largely random and lack constraint (Converse 1964, Zaller 1992).

While it seems fundamental for legislators to represent the public opinion positions of their constituents, this assumption should only hold for those who have the power to vote (Meyhew 1974). According to Down's median voter thesis, a legislator should take positions similar to that of the middle voter (Downs 1957). A long literature shows that individuals often hold differing policy preferences depending on their socioeconomic status (Verba and Nie 1972, Verba et al 1995). Theorists have longed worry that those who don't participate are not well represented (Dahl 1956, Lijphart 1997). In this view, it is suggested that increased participation among non-voters should create a more equal democracy (Verba et al 1978, Teixeira 1992, Rosenstone and Hansen 1993, Lijphard 1997). This creates a unique collective action problem. Non-voters live in and utilize resources. Their preferences, however, are not represented in the legislature except in cases where

they overlap with the voting population's preferences (Leighley 1995). Non-voters and voters were once thoughts to be similar (Bennett and Resnick 1990, Studlar and Welch 1986, Teixeira 1992), but those effect have more recently been attributed to a result of research design flaws (see Leighley 1995, Hill and Leighley 1992) and data limitations (Griffin and Newman 2005).

Legislators interested in re-election are trapped in a dilemma where it is not rational to represent non-voters preferences when there exists a risk of moving away from their district's median voter. In cases where large number of residents lack franchise, elected official's policy preferences can diverge far from the median residents' (Hill and Leighley 1992, Griffin Newman 2005). This is not to say that they diverge from the median voter, but that the ideological space that non-voters hold differs from the subset of residents that are able to vote. While all eligible voters hold some level of latent ability to participate in future elections which itself may constrain legislators, non-eligible residents can do little to push policy objectives in the direction of their interest.

The differences between voters and non-voters has become clearer. Voter's are socioeconomically more advantaged then nonvoters, leading to higher levels of mobilization in participatory actions besides voting (Verba and Nie 1972). Voters tend to be more conservative then non-voters (Griffin and Newman 2005). Voting is but one way to apply pressure to legislatures, however. Participation in extra-electoral outlets can help convey important preferences to legislators (Dalton 2008). Since voting is a private and individual preferences are secret, elected officials don't know the exact preferences of voters. Preferences can therefore only be revealed through explicit means such as letters from constituents, protests, and other forms of participation which both voters and non-voters can do. It is not clear if legislators can appreciate the difference between voters and non-voters, so the signals they learn from to adjust their preferences may be from both types of residents.

Sophisticated readers might ask what room there is in this literature to improve our knowledge of representation of non-voters. The answer lies in the dramatic and geo-spatially scattered increase in immigrants and inmates over the past few decades. Additionally, previous research largely has grouped all non-voters as being equivalent. This paper, on the other hand, acknowledges the difference between non-voters who choose not to vote and those who lack the franchise and thus are not eligible to vote. The number of foreign born, non-citizen population varies between Congressional Districts. In the 113th Congress, California's 34th had the most at 232,561 foreign born non-citizens, while Kentucky's 5th had the fewest with 2,588. As the map in Figure 1 shows, high foreign born population Congressional Districts are largely closest to the Southern border and in large cities.

Districts that have high proportion of Hispanics[3] who are naturalized correlate highly with those with non-citizen large proportions residents. Readers should be cautioned not to conflate illegal immigration with legal immigration. The total number of legal immigrants is at an all time high, as seen in Figure 2. Many of these legal permanent residents choose not to naturalize (Desipio 2001)[4], but may be unaware of the representational consequences to this choice.

Research has previously shown that Latinos and Whites have unequal representation, even when formally represented numerically (Hero and Tolbert 1995, Griffin and Newman 1997). This is couched in the long-standing findings that high-income individuals are better represented than those of lower incomes (Gilens 2005, Gilens and Page 2014). According to the US Census, foreign born, non-citizen median household income was $40,085, while it was $53,657 for the population in whole[5]. Despite the income differences, non-citizens are more likely then the population to have paying jobs (90.3% to 77.6%), likely implying they aggregate have less time to participate in politics Other descriptive differences between non-citizens and the rest of the population might also affect

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[3]We use the terms Hispanic and Latinos interchangeably throughout this document

[4]Two-thirds of all legal Latinos have not fulfilled the requirements to gain citizen, as of 2013 (Pew 2013).
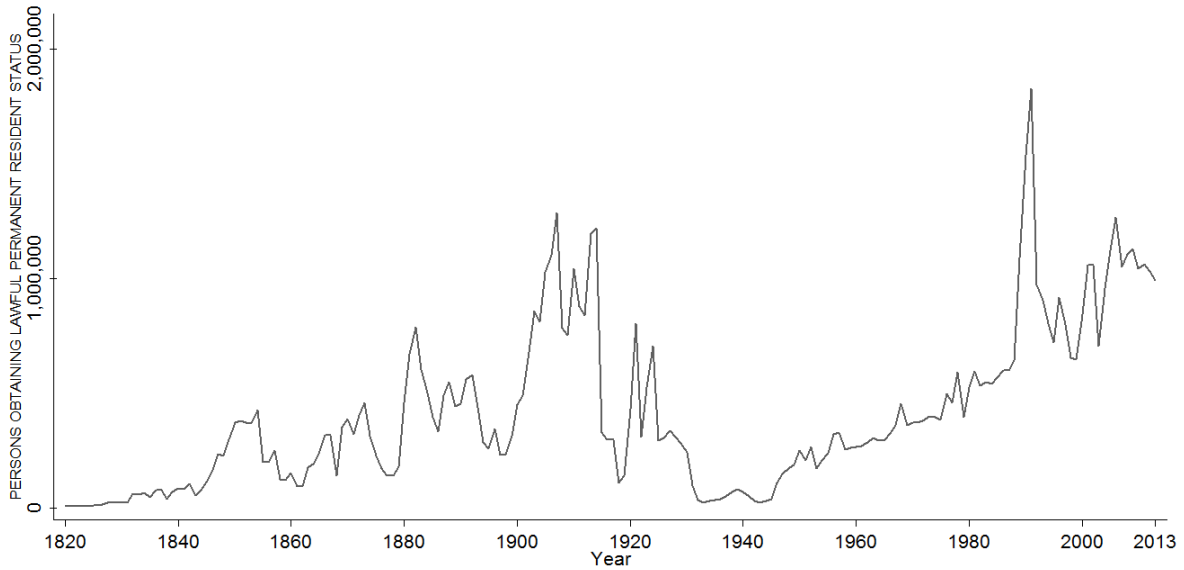
[5]ACS 2014 1-year, data found in table S0501

Figure 1: Congressional Districts by Proportion Not Eligible to Vote
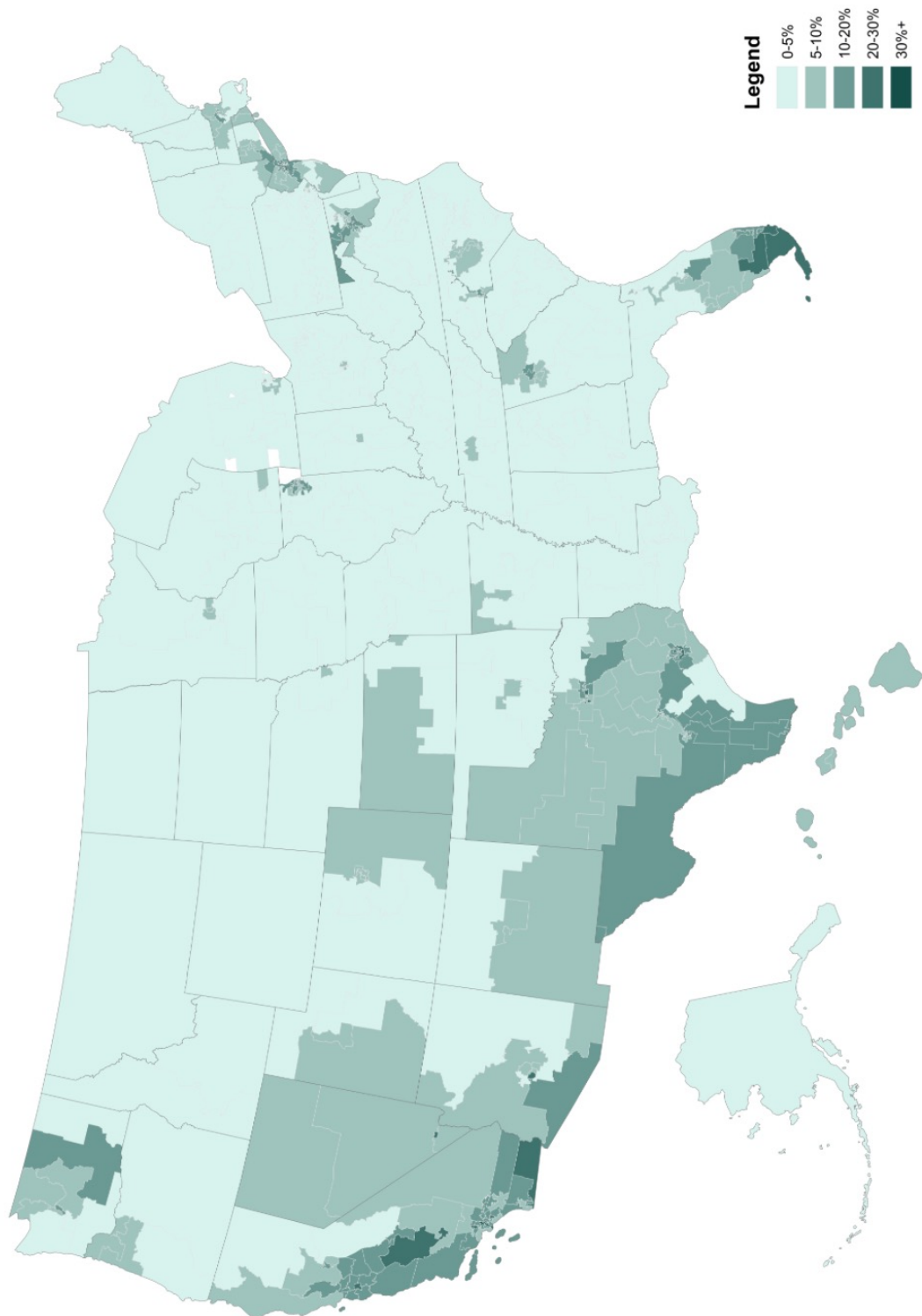
Note: Eligibility determined by citizens 18 and older.
Source - American Community Survey 2010 1-year.

Figure 2: Legal Immigrants by Year

representation. While the median age of the former group is equivalent to the population, those 25 to 44 years old are 12% higher for the later. Sidney Verba and colleagues showed how these differences can depress participation (Verba et al 1995), which has shown to subsequently reduce representation (CITE). Non-citizens are also over 75% more likely to speak a language other than English (88.8%) than overall (21.1%). Previous studies have established that Latinos and Whites hold different political preferences (Leal 2002), although we should be prudent to note that a pan-ethnic label may be premature (de la Garza et al 1992).

2 Institutions

The allocations of congressional seats are awarded based on the number of residents, not the number of voters. There is room to test hypothesis about representation using

the variation in voting age and voting eligible populations [6]. On face, legislators who shift their policy positions to reflect those of non-voters and away from actual voters do so at their own risk. Unlike the subconstituency theory of representation (Bishin 2009), non-citizen populations cannot generate policy victories by applying intense pressure to politicians.

Using US Census data, we can extrapolate some estimates of the effect Evenwel would have on each states share of Congressional seats. To arrive at these numbers, we subtract the foreign born non-citizen, disenfranchised ex-felons, and under 18 population.[7] All estimates are derived from the 2010 Census, although non-citizens are not reported in the decennial census, so those numbers are taken from the US Census American Community Survey. Apportionment totals for 2010 were slightly above 309 million for the US. Adjusted for voting eligible population, as Evenwel would do, only 206 million would be counted for representation in Congress. That implies that instead of 710,000 in each Congressional district, every 475,000 eligible voters qualifies for a district. As there is asymmetry as to the distribution of non-eligible residents, Table 1 shows which states gain and which states lose representation in Congress.[8]

3 Measuring Citizen and Non-Citizen Attitudes

The first question that needs to be answered is 'do non-citizens have different preferences then citizens?'. To answer, we look at survey responses. We aggregate eight questions asked between 2007 and 2014 on immigration related topics. The question

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[6]Although not completely, as they will have mostly in places with high amounts of immigration, i.e. the Southwest, California, and New York/New Jersey.

[7]The ex-felon populations taken from The Sentencing Project's 2010 state-level estimates (Uggen et al 2012). States have different laws which would affect how ex-felons would be counted if only eligible populations were counted. Some estimates have the disenfranchised population at about 2.5% of the voting age population in the US.

[8]A similar analysis could be done at the state level, but interpreting the results would not be as intuitive as they are for the US Congress. The fourteenth amendment does say explicitly that apportionment for the federal Congress is of all residents, so this analysis is merely an illustration. States, without court intervention, could change the way they apportion their state houses.

Table 1: Estimated 2010 Apportionment if only Eligible Voters Counted

| California | -6 | ↓ | Pennsylvania | 2 | ↑ |
Texas	-4	↓	Ohio	2	↑
Florida	-3	↓	Michigan	1	↑
Georgia	-1	↓	Missouri	1	↑
Arizona	-1	↓	North Carolina	1	↑
Nevada	-1	↓	Indiana	1	↑
			Louisiana	1	↑
			Oregon	1	↑
			Wisconsin	1	↑
			Massachusetts	1	↑
			Iowa	1	↑
			Montana	1	↑
			Oklahoma	1	↑

are all support/oppose. We recode the questions so the "liberal" response is zero. We can then average all the questions and aggregate to get an approximating of preferences. 196,285 total respondents gave answers to these questions. On average, the responses were 46.6% liberal, with a standard deviation of 25%. When dis-aggregating by citizenship, non-citizens answered 35.1% liberal, with a deviation of 23%. Citizens were indistinguishable from the population mean, as were those who were registered to vote when the survey was fielded.[9]

We now turn to ideology and partisanship. It is common practice to measure preferences as self-reported ideology and partisanship (Carsey and Harden 2010). In the CCES, ideology is asked on a five-point scale that is collapsed to three. Liberal is coded as 0, Moderate as .5, and Conservative as 1.[10] We likewise scale partisanship in the same way and average the scores together. Figure 3 shows the levels by race and citizenship.

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[9]A t-test reveals that there is not statistically significant difference between non-citizens and Hispanics on these questions. This is important to keep in mind when thinking about how representation in government would change if a proportion of the residents are no longer counted. The statistical difference between whites and non-citizen preferences on immigration is 14.5%, significant at the .001 level.

[10]Except in 2010, where a seven point scale is recoded in the same way.

Figure 3: Mean Ideology/Partisanship Score, by Race (Citizenship)
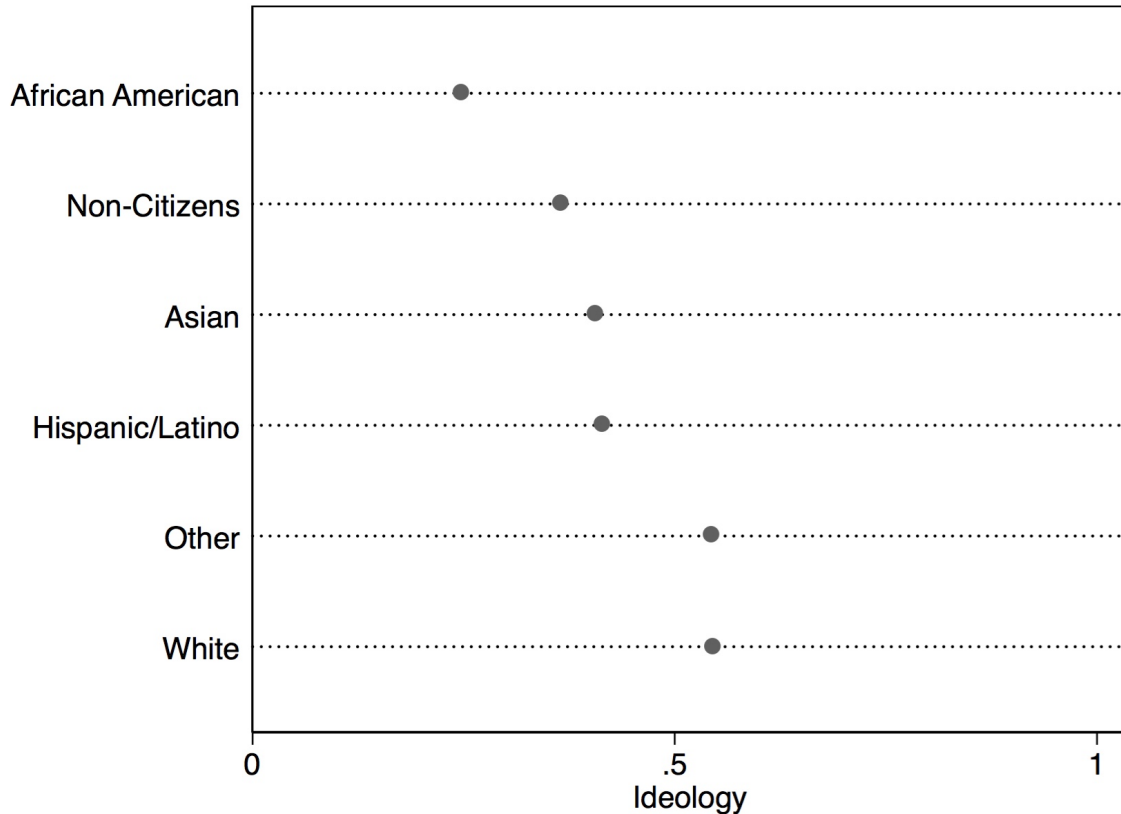
Note: Mean score of index ideology and partisanship CCES 2007-2014. 0 is Liberal (Democrat), 1 is Conservative (Republican). Not answered or unknown recoded as .5 (Moderate/Independent).

Prima facia validity is satisfied, as these scores seem to underlie traditional notions of how we conceptualize ideology and race. These measures will serve the basis for the analyses that follow.

4 Methods and Data

Exploiting the variation in congressional district's voting eligible population (VEP) and voting age population (VAP)[11], we can measure whether legislators respond to non-voter's preferences. Previous studies have been unable to capture district level preferences because data limitation. Advanced methods have made it possible to approximate opin-

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[11]see McDonald and Popkin 2001 for more information on the difference

ions with as little as 50 observations (Tausanovitch and Warshaw 2013) and create a common space where roll call votes of legislators can be matched to questions on surveys that directly ask respondents as if they themselves were voting on the legislation. The two are then "bridged" in order to place them on a common range[12]. Legislator ideal points have long been conceptualized as NOMINATE scores (Poole and Rosenthal 2000). Once both the legislator and the constituent, or sub-constituent preferences are in a common space, we can compare the two and measure observed differences as differences in representation.

Data to estimate district preferences will be taken from the Cooperative Congressional Election Study (CCES). This survey is conducted during every election cycle, and contains enormous samples that are representative at many levels of geographies. In all, we have 212,130 observations over six rounds of data collections.

In our first test, we seek to find whether non-citizens, who by definition are non-voting, are represented directly through roll-call votes by their congressperson. We rely on the dyadic principle of representation, or what Achen (1978) calls the proximity between legislators and constituents. Specifically, we will test

H1 - Are non-citizen's preferences less represented than those of voters?

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In lieu of this more advanced and accurate test, we first run an OLS regression that estimates the effective difference in voting ideology of legislators vis a vis the percentage of non-citizens in the congressional district. A positive coefficient on non-citizen proportion indicates that the legislator is more conservative and a negative coefficient indicates one that is more liberal. The null hypothesis, controlling for demographic characteristics of the citizen population, is legislators will be more conservative. This null hypothesis rest on the assumption that legislators are interested in re-election and not Weissberg's (1978) notion of collective representation. We are also assuming that non-citizens will

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[12]For a more extensive explanation of this process, see Tausanovitch and Warshaw 2015

hold more liberal views then citizens, based on evidence that suggests that the Democratic party is the party of choice for minority groups (Carmines and Stimson 1989).

In the second test, we will use the natural experiment that is created during redistricting. Every decennial, congressional districts are reapportioned, in turn changing the character and ideology in terms of ethnic, racial, partisan, and foreign born composition. We can leverage to compare legislator's roll calls before and after the redistricting period to see if their ideal points changed based on the changing levels of non-citizens (Glazer and Robbins 1985). Evidence suggests that politicians suffer electorally when they take positions that appear ideologically distant from the voter's preferences (Canes-Wrone et al 2002, Ansolabehere and Jones 2010, Nyhan et al 2012). We will calculate the district level respondent's answers to questions about immigration. Data employed will be from the CCES. 3,346 respondents are non-citizens, and from that sub-sample we will aggregate their responses and use this as a proxy for non-citizens generally. [13] We create two separate measures, one from surveys from the 2007 to 2010 CCES, and the other from 2012 to 2014. These two represent the before and after redistricting preferences of constituents. It also changes for an aggregate change in preferences among the public. Following Glazer and Robbins (1985), we hypothesize

> H2 - Representative will adjust their roll call voting in the direction of the
> ideological change in their district.

We begin by looking at only those who won re-election in 2012. Legislator i in election t will be situated in a district δ of a certain composition. Their re-election in δ_{post} will partially be a result of their ability to convince their new constituents that they represent them. While not all districts change their ideological boundaries, some do. Opinion shifts and changing demographics might also affect the ideological preferences of residents. Re-election may hinge on a legislator's ability to react to these changes. We measure this as

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[13]We are taking some liberties here, as the sample is not meant to be representative for non-citizens, and it is a stretch to believe that all non-citizens are the same regardless of their race, gender, or geographic location.

the change in legislator's DW-Nominate score,

$$\Delta i_{DW} = i_{DWpost} - i_{DWpre}$$

where i is the legislator. Similar to the measure of change with legislators, we measure the difference in non-citizens before and after redistricting as

$$\Delta \delta_{NC} = \delta_{postNC} - \delta_{preNC}$$

We also control for change in vote share between period post and pre and the change in presidential vote share for the Democratic presidential candidate in the same period.[14] We again use the districts ideology thermometers as a control in order to isolate the effect on immigration specific issues. The focus on only those who won re-election allows us to see if those who won re-election had to shift their ideological voting in order to succeed. Losers presumably were unsuccessful of adjusting their voting. We include a variable that is equal to the log time a legislator has been in office. We do this in response to Powell's (1982) finding that agreement between a legislator and his constituents decreases the longer a legislator has been in Congress. Seniority offers legislators an advantage to their less senior peers to bring home revenues, and the long history in their area has allowed for their re-election in previous points. A long career is an indication that a legislator has been able to adjust to changing public moods (Glazer and Robbins 1985). The equation that estimates the response too their constituents preferences is as follows:

$$i_{DWpost} = i_{DWpre} + \Delta \delta_{NC} + \Delta \delta_{PresidentialShare} + i_{Seniority} + \Delta \delta_{ideology}$$

The dependent variable is a legislator's NOMINATE score immediately after redistricting. To explain their score, we add the legislator's pre-redistricting NOMINATE score on the right hand side of the equation.[15] The variable of interest is the coefficient on

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[14]Presidential vote share acts as a proxy for the ideology of the district's actual voting population, those we assume the legislator is responding to.

[15]This is equivalent to subtracting the post and pre score, or a lag variable which is common for isolating the change between the two variables.

$\Delta\delta_{NC}$. This indicates whether the legislator is responsive to the non-citizen portion of the population that can not vote. The other control variables are designed to isolate the effect of non-citizen proportion.

For the third test, we conceptualize district ideology as preferences on immigration. Since all non-citizens are by definition immigrants[16], we presume that immigration is salient. Questions used are a compilation six part index all asked as agree/disagree[17]. We add them up and divide by six, thus giving us a scale that runs from zero to one. Districts will then be aggregated to provide a mean score. This method has been shown to provide reliable estimates of constituent preferences that are stable, approaching the strength of party id (Ansolabehere et al 2008). To keep legislator and district preferences consistent, zero will be the liberal position while one will be the conservative. The goal of this test is to measure legislative responsiveness to specific issues. Specifically, we want to see if legislators are more likely to belong to a Congressional Caucus, vote in the affirmative on specific legislation related to immigration, or highlight pro-immigrant statements on their website if their district has a larger proportion of non-citizens.

The forth test of legislative representation involves comparing Congressional districts that are in most ways similar except the number of non-citizens. The idea is simple; if two districts have equal numbers of people, and they have demographics that resemble each other, and legislators who come from the same party, then we should expect them to govern similarly. If, however, the decreased number of eligible voters (and increased non-citizens) subsequently changes the legislator's preferences, we could contend that their representation can not be fully attributed to re-election incentives. The dependent variable will be the National Immigration Score Card by the Hispanic Foundation.[18] Scores

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[16]Those born in the United States are granted birth-right citizenship.

[17]Wording of the questions can be found at Harvard Dataverse under CCES. Variables are recoded so the liberal position is 0 and the conservative position is 1.

[18]The final scores for House members in 113th Congress will be based on the following criteria: Co-Sponsorship of H.R. 15, Border Security, Economic Opportunity, and Immigration Modernization Act (List of co-sponsors) Signature on Discharge Petition for H.R. 15, Border Security, Economic Opportunity, and Immigration Modernization Act (Current signatures on 113th Congress Discharge Petition Number 0009) A recorded "NO" vote on Rep. Steve King's Amendment to H.R. 2217, Department of

have been collected in the 105th, 106th, 107th, 108th, and 113th Congresses. We match up Congressional districts in the same session, so that confounding factors are controlled for. After we match up Congressional district, we will have two samples; a control and a "treatment". The treatment is the Congressional districts with larger numbers of non-citizens. We will then compare the two, determining if there is a systematic difference in immigration scorecards for legislators who represent districts with large numbers of non-citizens. As we determined earlier, non-citizen and Hispanic preferences on immigration are very closely related, so we need to be sure the effect is because of the number of non-citizens, not Latino. To do this, we look at districts with high numbers of non-citizens that are not of Hispanic ethnicity separately.

In the final test of legislative responsiveness to non-citizen population, we conduct an experiment. Following Broockman's (2014) study of constituent communication with representatives, we test whether legislators communicate to non-citizens. Broockman found that constituents were less likely to communicate with a legislator of the opposite race, both for whites and blacks. Broockman utilized Maryland's multimember districts to randomize white and black legislators/constituents. Unlike Broockman, we are seeking to measure legislator responsiveness to constituents who can not vote. This is a way to directly assess a dimension of representation that can't be captured in roll call votes. To do this, we will send members of state legislatures emails asking for information on their positions towards amnesty. For the control group, we will send emails not specifying if the constituent is a citizen or not or if they are a voter. In the second group, the same email is sent but we will indicate that either one, they voted for them, or two they voted without say for whom they voted. In the treatment group, emails will indicate that they are a recent legal permanent resident and wanted to know the legislator's position on amnesty. The ultimate goal is to see if there are any differences in response rate depending on whether the legislator knows the constituent can vote. Elected representatives are

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Homeland Security Appropriations Bill (Roll Call Number 208, 113th Congress, 1st Session) A recorded "NO" vote on the "ENFORCE Act of 2014" H.R. 4138 (Roll Call Number 124, 113th Congress, 2nd Session) A recorded "NO" vote on the Faithful Execution of the Law Act of 2014, H.R. 3973 (Roll Call Number 129, 113th Congress, 2nd Session) A recorded "YES" vote on the Nadler amendment A No. 2 to the "ENFORCE Act" (Roll Call Number 121, 113th Congress, 2nd Session) A recorded "YES" vote on the Deutch amendment to H.R. 2217 (Roll Call Number 198, 113th Congress, 1st Session)

normative supposed to represent all residents, not just those who vote or are citizens. This test empirically whether that is true or not.

5 Discussion

Often times, debate on immigration in America devolves into conversations about legality, amnesty, and deportation. Let out of the conversation is how our government responds to these residents, many who are here legally. It is fair to say that there is little incentive for legislators to shift their policy preferences into the direction of non-voters. Except when voter and non-voter preferences overlap, any legislator who does so does at the risk of losing voters in the next election. Its not totally clear whether voters are willing to give legislators some room to choice policy that are closer to their own preferences or that of the collective. Perhaps voters are less interested in policy and more interested in constituent services (Fenno 1977). If this is the case, legislators can have more freedom in representing the interest of residents of their districts without worrying about backlash (Bishin et al 2015). Scholars of representation sometimes get lost in the idea that if legislator's ideal points don't coincide with their district's median voter that something is wrong with democracy. It is not clear that voters select politicians to by dyadic, or that to wish is closest to their own preferences. Instead, recognizing the needs of their community, perhaps a voter chooses legislators that represent the collective, or a "Weissberg" (1978) legislator. So long as legislators remain loyal to their constituents, and proximate their ideal points (Tausanovitch and Warshaw 2015), this view of democracy might be more encouraging then more pessimistic views.

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