

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Ana Flores, Rene Flores, Maria Magdalena Hernandez,  
Magali Roman, Make the Road New York, and New York  
Communities for Change,

Plaintiffs,

v.

Town of Islip, Islip Town Board, and Suffolk County  
Board of Elections,

Defendants.

2:18-cv-03549 (ADS) (GRB)

**DECLARATION OF ANDREW A. BEVERIDGE, Ph.D.**

ANDREW A. BEVERIDGE declares pursuant to 28 U.S.C. § 1746:

1. I am submitting this declaration to correct typographic errors contained in my initial Expert Report, dated March 1, 2019.
2. In paragraph 57, I changed “total population by geographic area” to “CVAP by geographic area.”
3. In paragraph 4 of Appendix 1, I changed “centered around the year of the election” to “centered around the year of the election if possible.” In footnote 57, I changed “For more recent elections I used the most current five-year ACS data available at the time” to “For elections occurring in 2015 or later, I used 2012–2016 five-year ACS data, which was the most current data available at the time I provided data to Dr. McDonald. For elections occurring in 2004, 2005, and 2006, I used 2005–2009 five-year ACS data, which is the earliest five-year ACS data available. For all elections occurring before 2004, I used data from the applicable long-form decennial Census.”

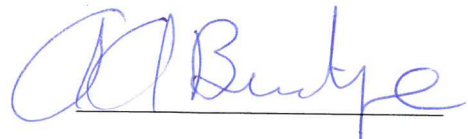
4. In Table 1 of Appendix 2, I changed “4,614” to “3,756,” “26,740” to “21,768,” and “5,725” to “4,660” in the bottom three rows of the column titled “Grofman/Garcia Surname Method.”

5. In Exhibits 5a and 5b I deleted “2016 ACS” from the eighth row of both tables to clarify that the data is from the 2013–2017 ACS as stated in the exhibit titles and source row. I changed “ACS 2013–2017 ACS” to “2013–2017 ACS” in the title of Exhibit 5a. I changed “2013 to 2017” to “2013–2017” in the title of Exhibit 5b. I also moved Exhibit 5a to be located immediately after the “Exhibit 5” slip sheet instead of immediately before.

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

Executed at: Central Islip, New York

April 8, 2019



ANDREW A. BEVERIDGE