

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 MICHAEL D. MCDONALD

MICHAEL D. MCDONALD 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 13, I changed “Column 2 lists the major party candidates contesting each of the eight elections” to “Column 2 lists the major party candidates contesting each of the seven elections.”
3. In Table 1, I changed “Fenley” to “Finlay.”
4. In Table 4, I switched the votes reported in the “Rep Vote” and “Dem Vote” columns.
5. In footnote 17 on page 30, I changed “Figure 2” to “Figure 3.”
6. In paragraph 48, I changed “...in which 16 council members were elected” to “...in which 14 council members were elected.”
7. In Table 6, I changed “Fenley” to “Finlay.”
8. In Table 7, I changed “Fenley” to “Finlay.”

9. In paragraph 60, I changed "...previously presented and discussed in this report to demonstrate how candidates of choice of Latino voters would have fared in elections limited to LD9" to "presented and discussed in this report to demonstrate how candidates of choice of Latino voters would have fared in elections limited to LD9."

10. In Table 11, I changed "2003-17" to "2005-17."

11. In Table 11, I changed "Fenley" to "Finlay."

12. In Table 12, I changed "2003-15" to "2006-15."

13. In Table 13, I changed "2003-17" to "2005-17."

14. In Table 14, I changed "2003-17" to "2005-17."

15. In Table 15, I changed "2003-17" to "2005-17."

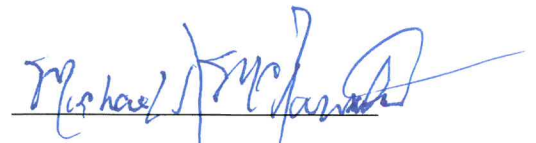
16. In Table 16, I updated the numbers of votes for Latino CoC and votes not Latino CoC to reflect the numbers reported in the body of my report.

17. In paragraph 66, I changed "Election at all levels show persistent patterns of ethnically/racially polarized voting among voters in Islip, in which white candidates and Latino candidates votes as distinct blocs" to "Election at all levels show persistent patterns of ethnically/racially polarized voting among voters in Islip, in which white voters and Latino voters vote as distinct blocs."

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

Executed at: Central Islip, New York

April 8, 2019



MICHAEL D. MCDONALD