

Supplemental Rebuttal Report of Anthony E. Fairfax

Stone v. Allen, No. 2:21-cv-01531 (N.D. Ala.)

May 5, 2024

I. Introduction

1. This report provides supplemental changes to my amended rebuttal report dated April 30, 2024.
2. On May 4, 2024, in reviewing my prior reports, I noticed that I had inadvertently and erroneously provided incorrect versions of the map and map files for my Illustrative Plan 2 for my amended report dated April 30, 2024, and original rebuttal report date April 19, 2024, even though all of the statistics included in those reports reflected the correct and intended Illustrative Plan 2 (labeled here as Illustrative Plan 2a for clarity).¹ In addition, related to the Illustrative Plan 3, there was an erroneous value placed in the narrative and Table 3 in my rebuttal reports as well.
3. Consequently, this report discusses and includes the minimal geographic and attribute differences between the plans. The difference between the original disclosed Illustrative Plan 2 and the preferred plan, Illustrative Plan 2A is described below. I also include one correction for Illustrative Plan 3.

II. Illustrative Plan 2 Changes

4. The differences between the originally produced Illustrative Plan 2 and the Illustrative Plan 2A included with this supplement are minimal. They involve only four VTDs: Decatur Utilities, First Bapt Church Tanner, Grace UM Church, and Morgan Co Courthouse.

¹ I also inadvertently used the incorrect version of my Illustrative Plan 3, however, the differences between the intended and submitted Plan 3 are so minimal that they do not warrant providing an updated plan. My intended version of Illustrative Plan 3 would have unsplit the VTDs of Grace UM Church and Monrovia Comm Ctr in SD 7, lowering the total number of VTD splits in the plan from 12 to 10. Otherwise, no other metrics would have changed.

5. In Plan 2A, the whole VTD of Decatur Utilities is added to SD7 while the entire VTD of Morgan Co Courthouse is removed. Additional census blocks in First Bapt Church Tanner and Grace UM Church were added in a compact manner. The differences combined provide for a more compact district without significantly changing the other redistricting criteria.
6. Figure 1 depicts the differences between Illustrative Plan 2 and 2A. The background color represents Illustrative Plan 2 while Illustrative Plan 2A is depicted using the black boundary lines, with bold red boundary lines reflecting the differences.

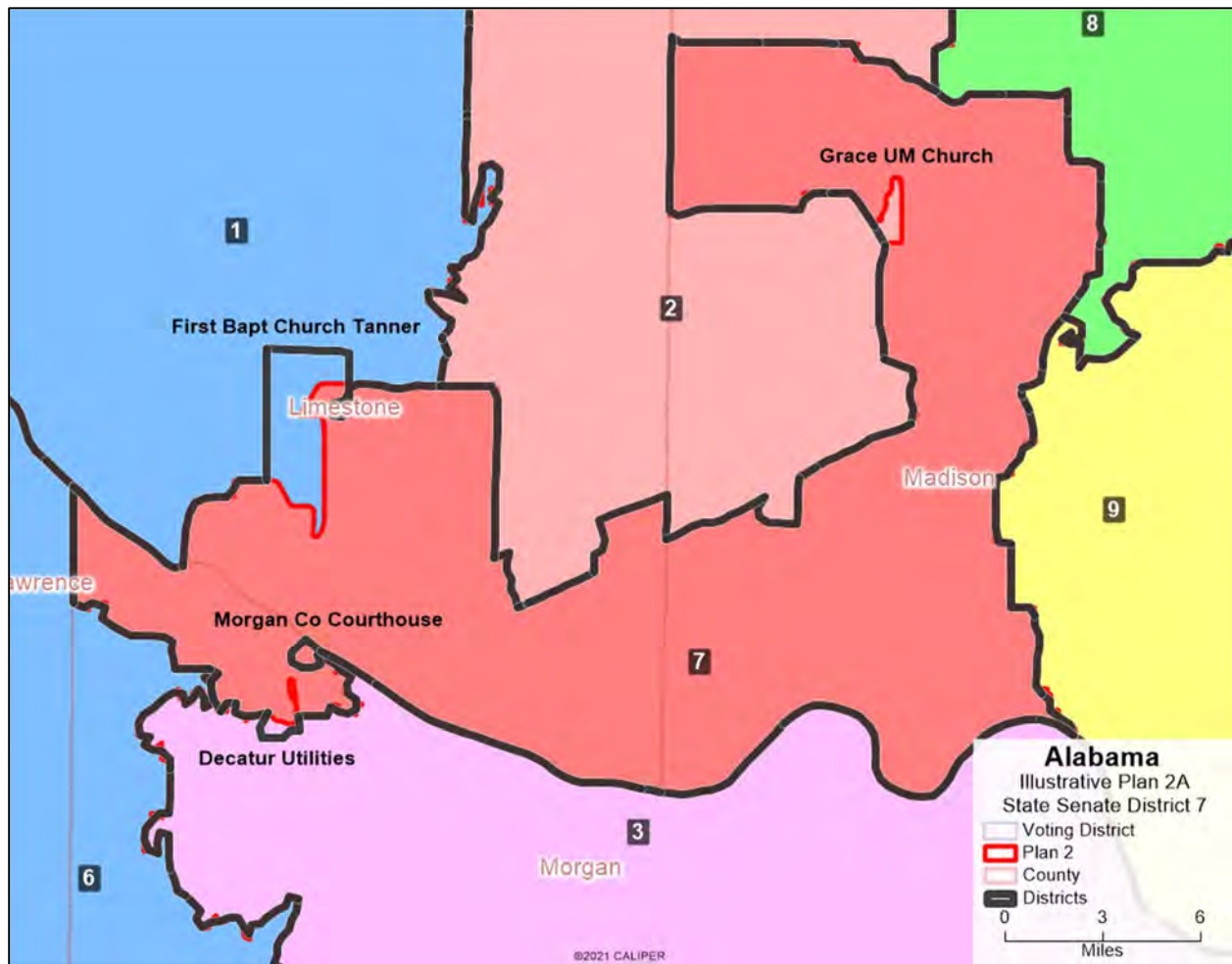


Figure 1 - Illustrative Plan 2A with Plan 2 as Background Color

7. As a result, the Illustrative Plan 2A differs marginally from Plan 2 as it pertains to some redistricting criteria. The Polsby-Popper mean compactness score changes from 0.24 for Illustrative Plan 2 to 0.25 for Illustrative Plan 2A. The Reock and Convex Hull scores remain the same. The Illustrative Plan 2A also differs by the population deviation lowering to 9.64%, the Landmark Area splits increasing by one to 95, and SD7 BCVAP increasing to 50.19% (See Appendix B).² Otherwise, the data included in the narrative of my amended rebuttal report and Table 2 in that report remains the same for Plan 2A.

III. Illustrative Plan 3

8. For Illustrative Plan 3, pertaining to compactness, I erroneously indicated that eight districts performed better in the Illustrative Plan 3 than in the enacted plan and that six districts performed better in the enacted plan. The compactness results should read that seven districts performed better for the Illustrative Plan 3 and seven districts performed better for the enacted plan.

IV. Conclusion

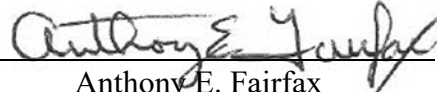
9. Given the analysis and results of the illustrative plans, I continue to conclude that the Black population in the state of Alabama is sufficiently large and geographically compact to create a map with two additional single-member majority-Black districts that adheres to traditional redistricting criteria.

V. Appendices

- Appendix A - Maps of Illustrative Plans 2A
- Appendix B - Redistricting Criteria Reports Illustrative Plans 2A

² BCVAP includes Not-Hispanic Black Alone plus Not Hispanic Black and White CVAP.

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


Anthony E. Fairfax
Executed on: May 5, 2024