

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS**

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In Re 2011 Redistricting Cases))
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) Superior Court No. 4FA-11-2209-CI
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DECLARATION OF JOE MCKINNON

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Joe McKinnon, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of and can and would testify to the facts set forth below.
2. I have worked with Alaskans for Fair Redistricting (AFFR) throughout this redistricting cycle. My role, assisted by Doug Tosa, was largely to produce maps and accompanying narratives for proposed redistricting plans that meet the mandates of the Alaska Constitution and the Voting Rights Act.
3. Attached as Exhibit 1 is a statewide map of AFFR’s plan which was submitted to the Board as AFFR 06. Some groups saw a map with a typo and mistakenly refer to it as “AFFR 7th Adjusted” but it is the same map as AFFR 06.

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Anchorage, Alaska 99501
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- 1 4. Attached as Exhibit 2 is a chart showing the population and Native VAP and
2 other relevant statistics for each of the districts in the AFFR 06 plan. This
3 exhibit shows three effective Senate seats (R, S and T) and five effective
4 House seats (35-39).
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6 5. Attached as Exhibit 3 is a comparison of three Interior districts: the Board's
7 Hickel Plan, its Amended Proclamation Plan and the AFFR 06 plan.
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9 6. Attached as Exhibit 4 is a detail of the Board's Amended Proclamation Plan
10 showing the split of Bristol Bay between Districts 36 and 37.
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12 7. Attached as Exhibit 5 is a statewide comparison of the Board's Hickel Plan,
13 its Amended Proclamation Plan and the AFFR 06 plan.
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15 8. Attached as Exhibit 6 is a comparison of the Board's Aleutians District 37
16 and AFFR 06's Aleutians District 38.
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18 9. Attached as Exhibit 7 is a comparison of the Board's Interior District 39 and
19 AFFR 06's Interior District 35.
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21 10. Attached as Exhibit 8 is a comparison of the Bristol Bay / Aleutians
22 Districts in the Board's Hickel Plan, its Amended Proclamation Plan and the
23 AFFR 06 plan.
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25 11. Attached as Exhibit 9 is a copy of the email and cover letter that I sent with
26 the AFFR 06 plan on April 4, 2012. As referenced in that email, I had
27 submitted an earlier AFFR plan called AFFR 05 on March 28th that had
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errors in it caused by a software malfunction in the version of the Autobound districting software used by AFFR. The error, not observable by AFFR in its version of the software, resulted in one Senate district falling below the correct VRA percentage. That plan was discussed by the Board on March 29, 2012 and appears in the Board record as Exhibit H. The error was corrected and a revised plan was submitted to the Board on April 4, 2012 as AFFR 06. The AFFR 06 plan changed very little in concept from the AFFR 05 plan except that it fixed the VRA problem by relocating some communities.

12.I have reviewed this document for accuracy and authorized the use of my electronic signature to attest to it.

s/jmckinnon
Joe McKinnon