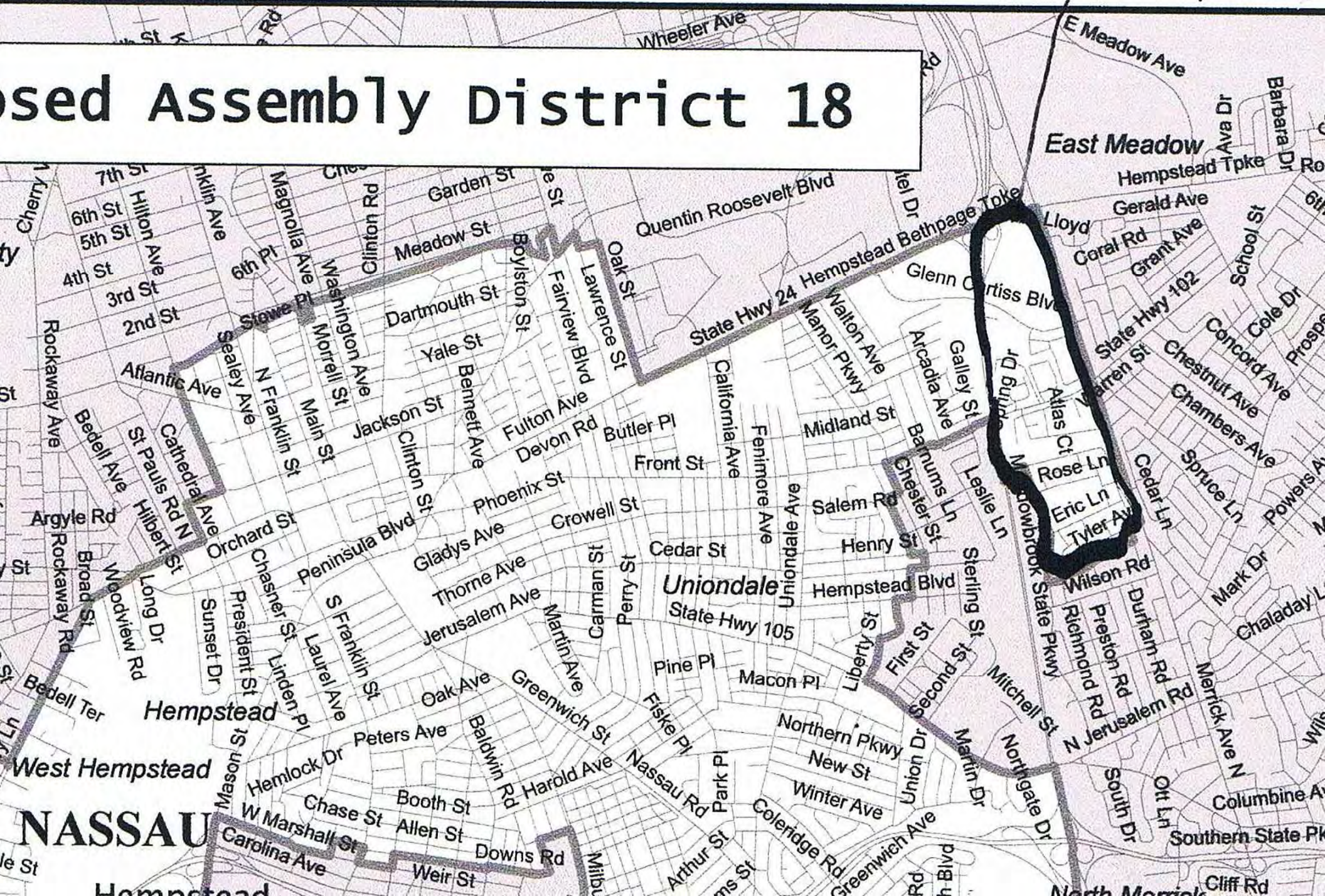


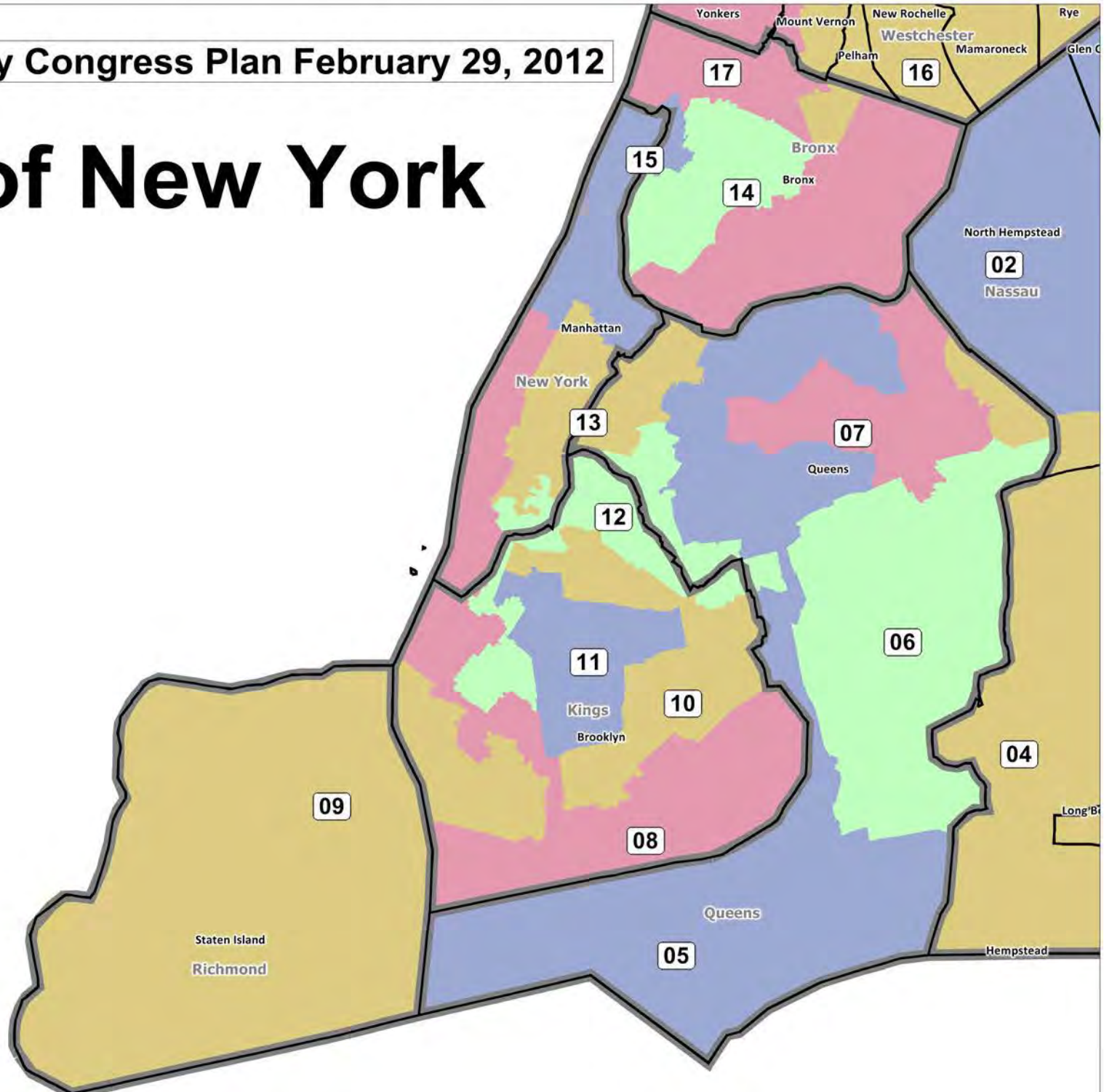
18-818-8

# Proposed Assembly District 18



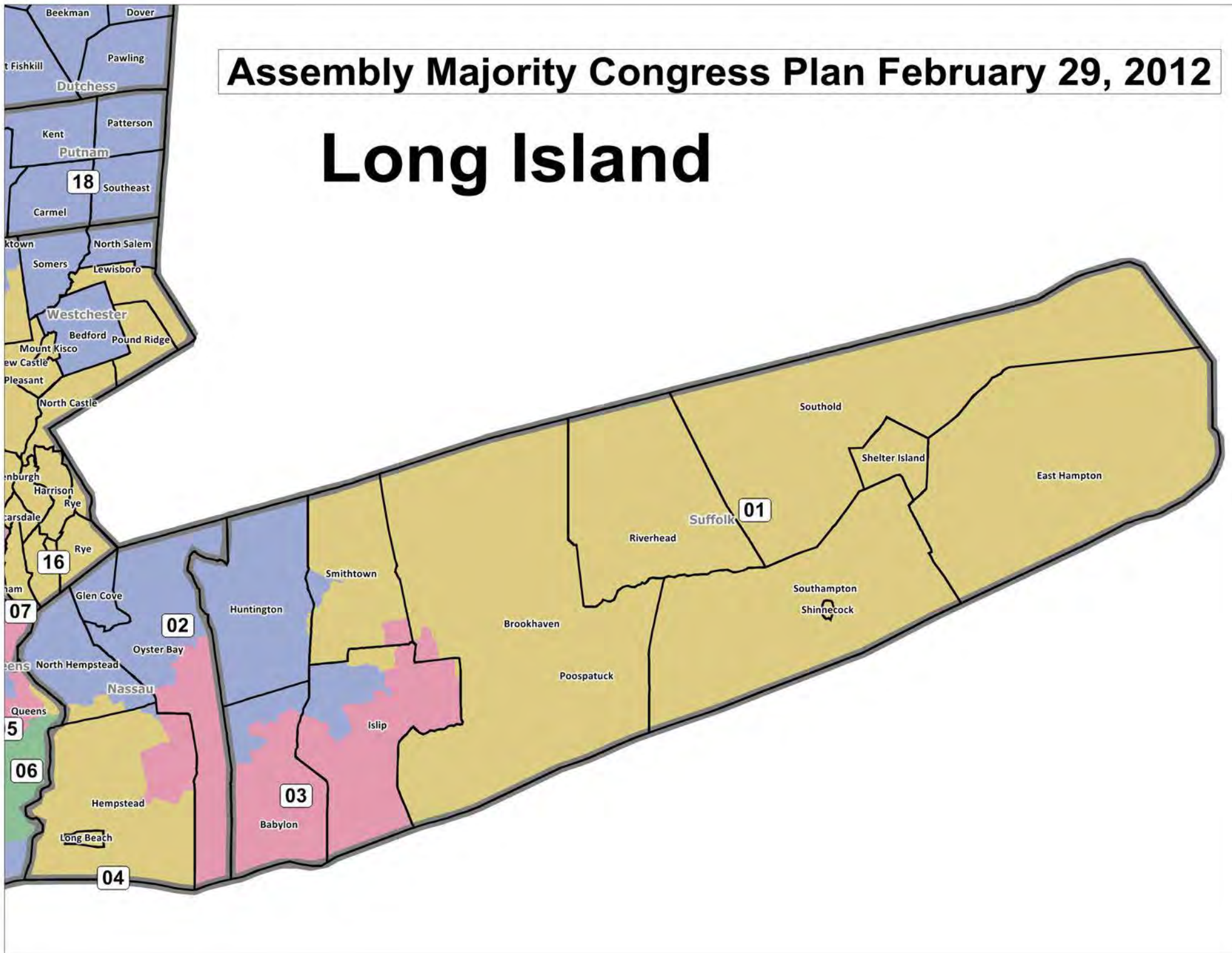
Assembly Majority Congress Plan February 29, 2012

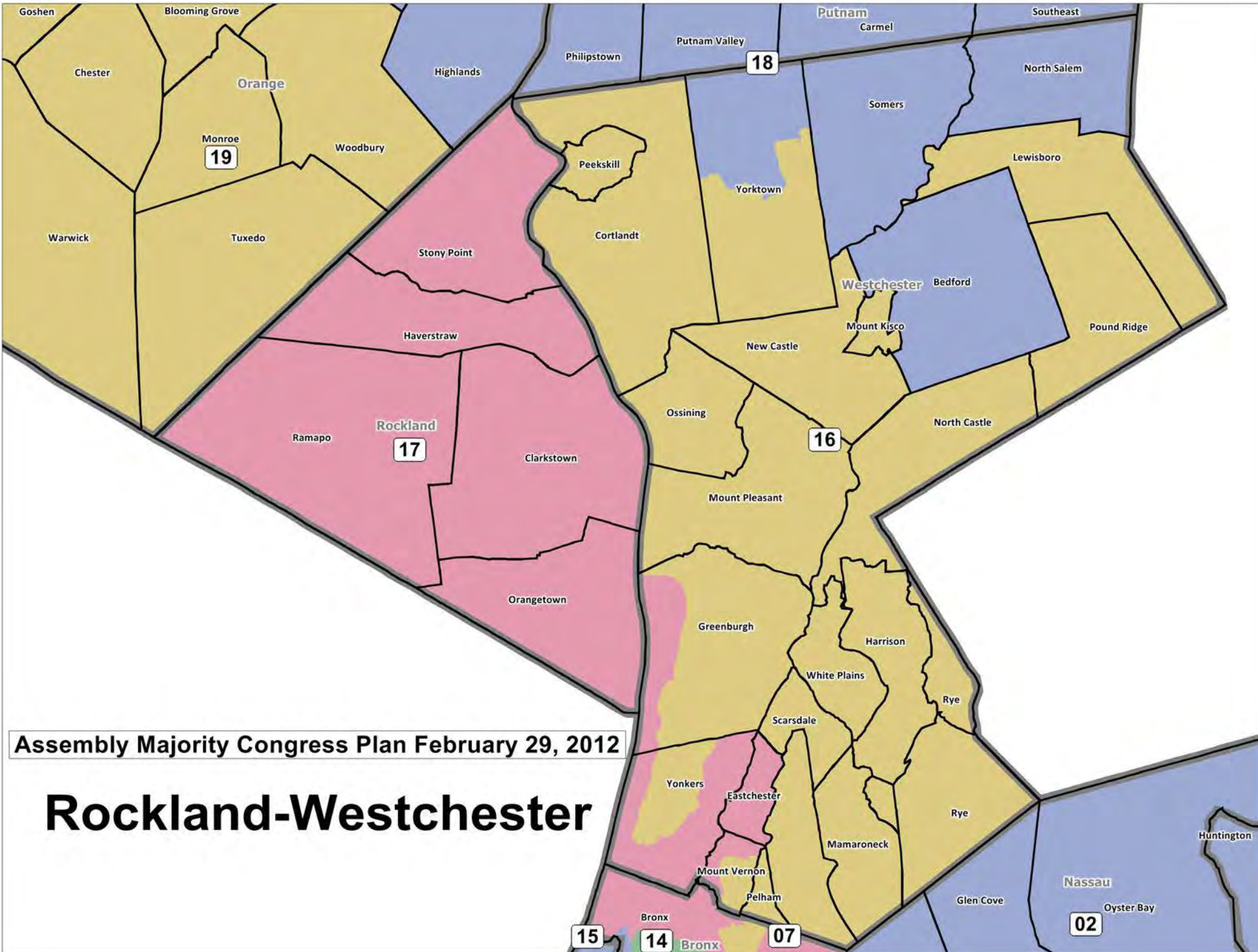
# City of New York



Assembly Majority Congress Plan February 29, 2012

# Long Island



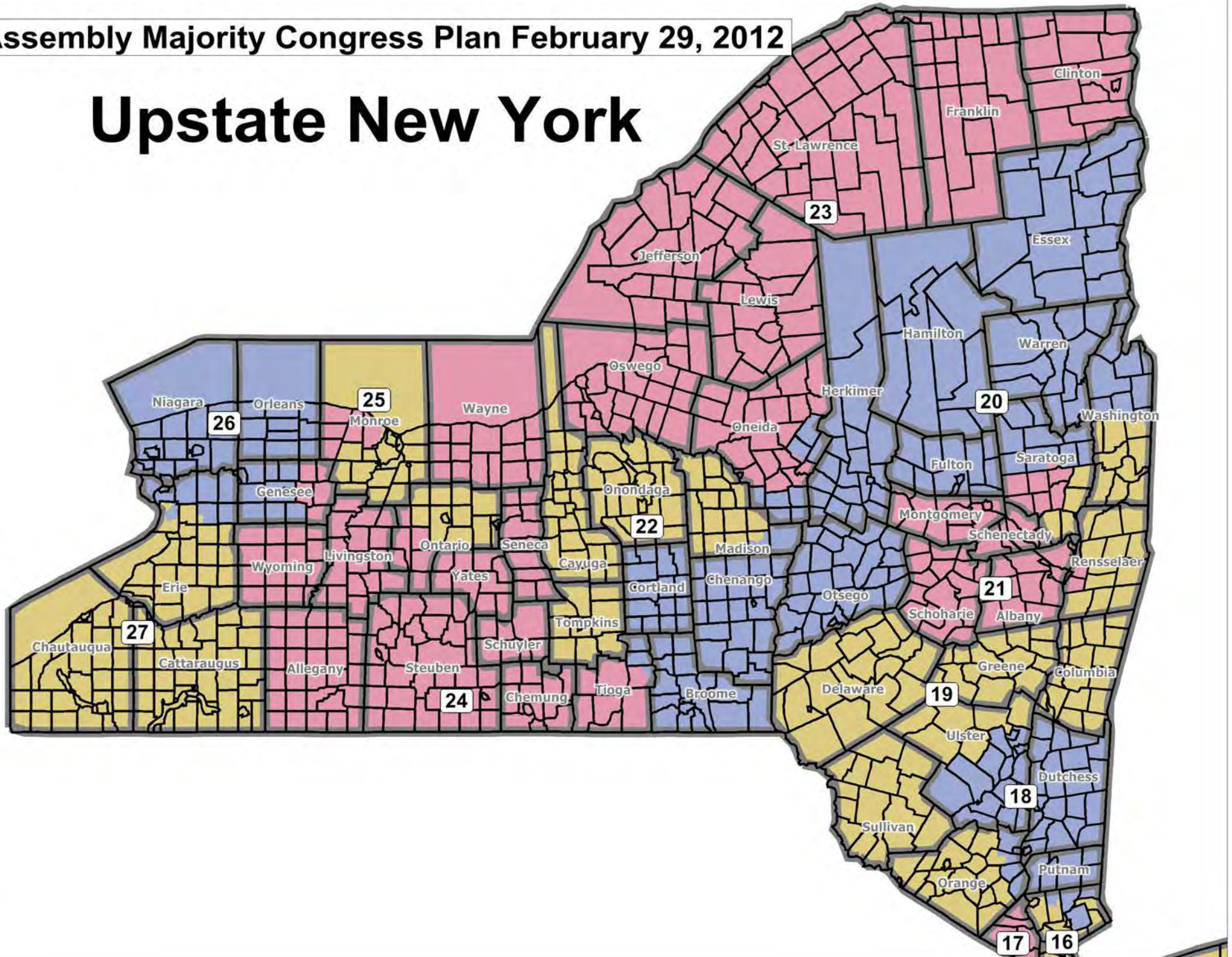


Assembly Majority Congress Plan February 29, 2012

# Rockland-Westchester

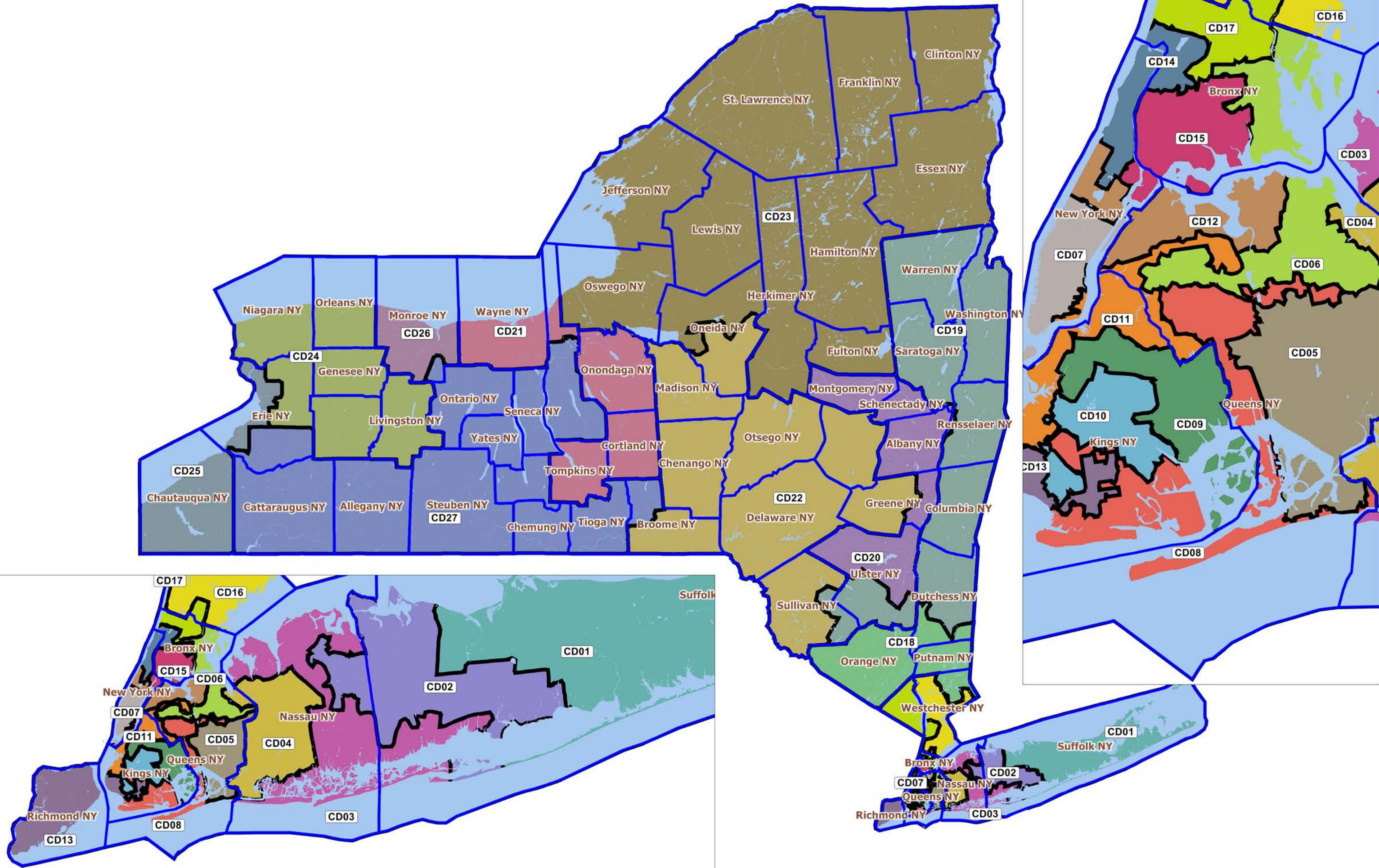
Assembly Majority Congress Plan February 29, 2012

# Upstate New York

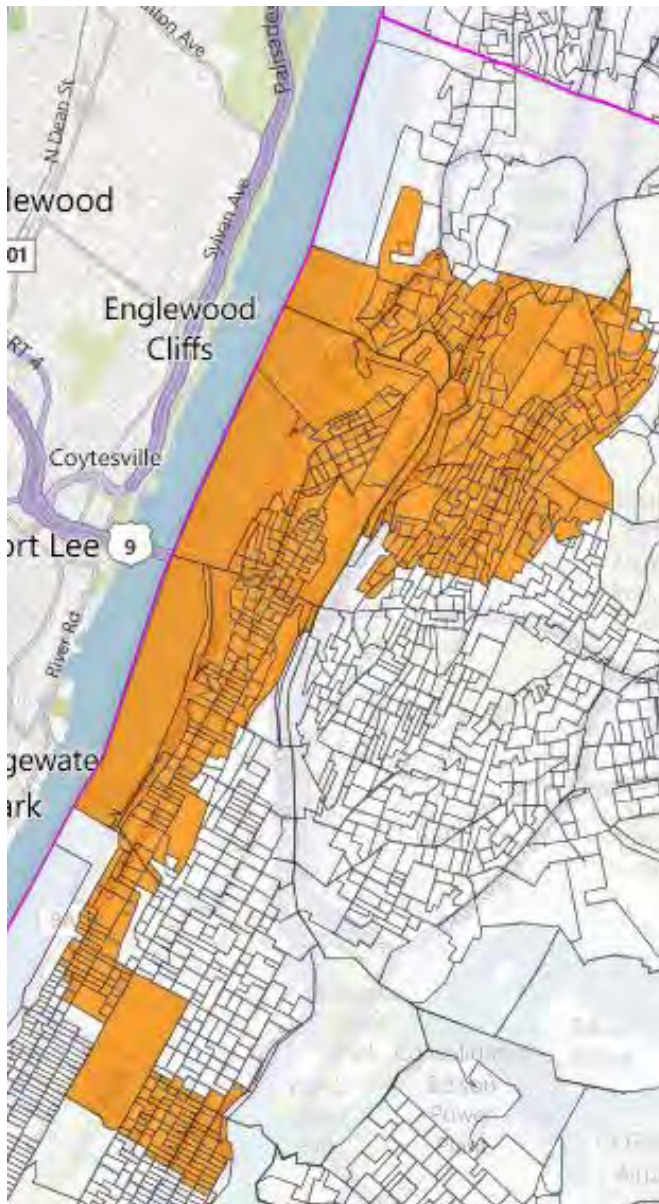


# **EXHIBIT A**

**Defendants Senator Dean G. Skelos et al.  
Proposed Congressional Map**



# Congressional District 14



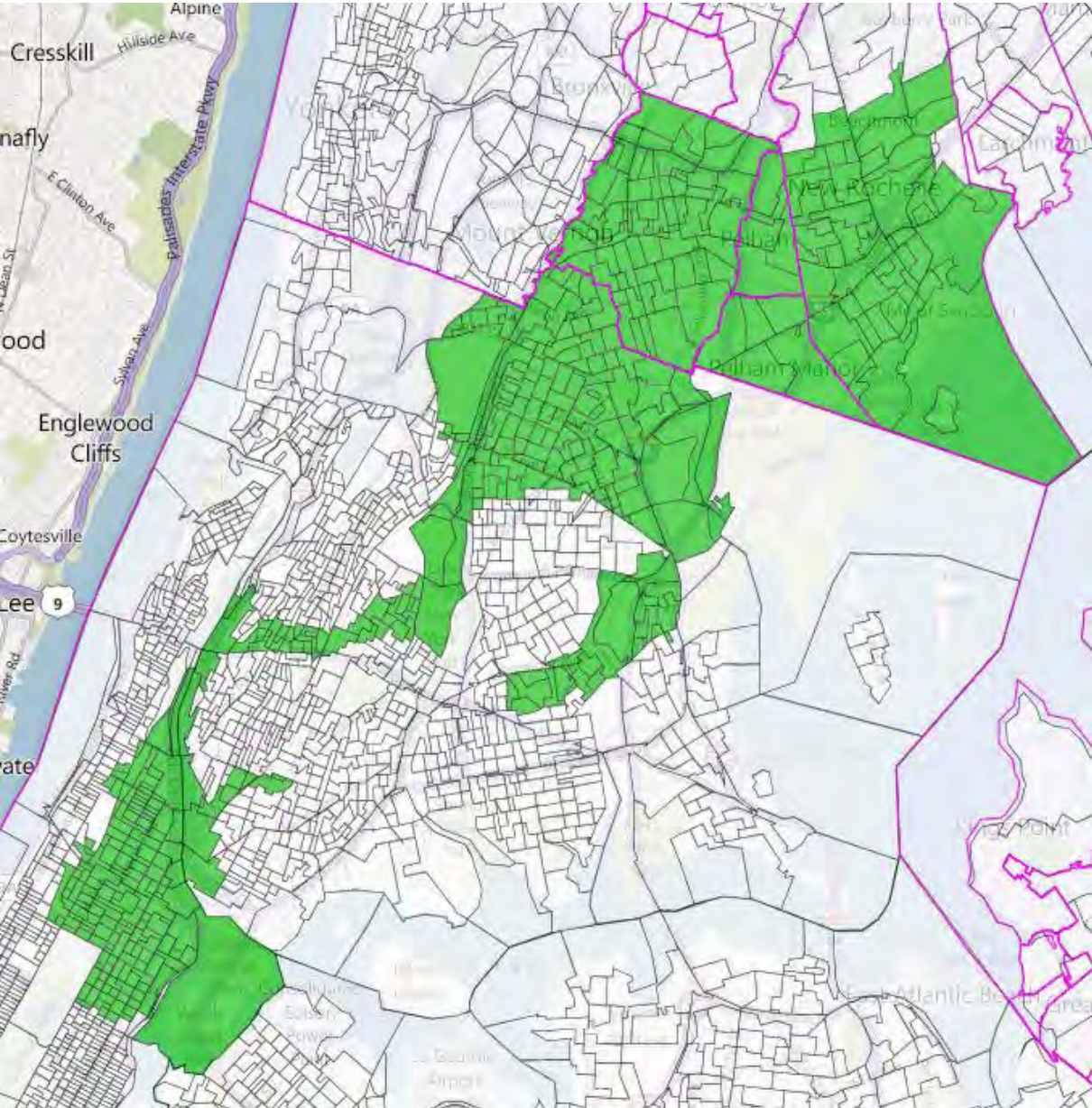
<b>CD 14</b>		
All	Pop	%
<b>Tot</b>	717,900	
Wh	169,673	(23.6)
Bl	102,924	(14.3)
Hisp	395,083	(55.0)
Asn	36,279	(5.1)
Nat	1,254	(0.2)
Oth	12,687	(1.8)

18+	Pop	%
<b>Tot</b>	561,561	
Wh	148,763	(26.5)
Bl	80,395	(14.3)
Hisp	291,572	(51.9)
Asn	31,076	(5.5)
Nat	874	(0.2)
Oth	8,881	(1.6)

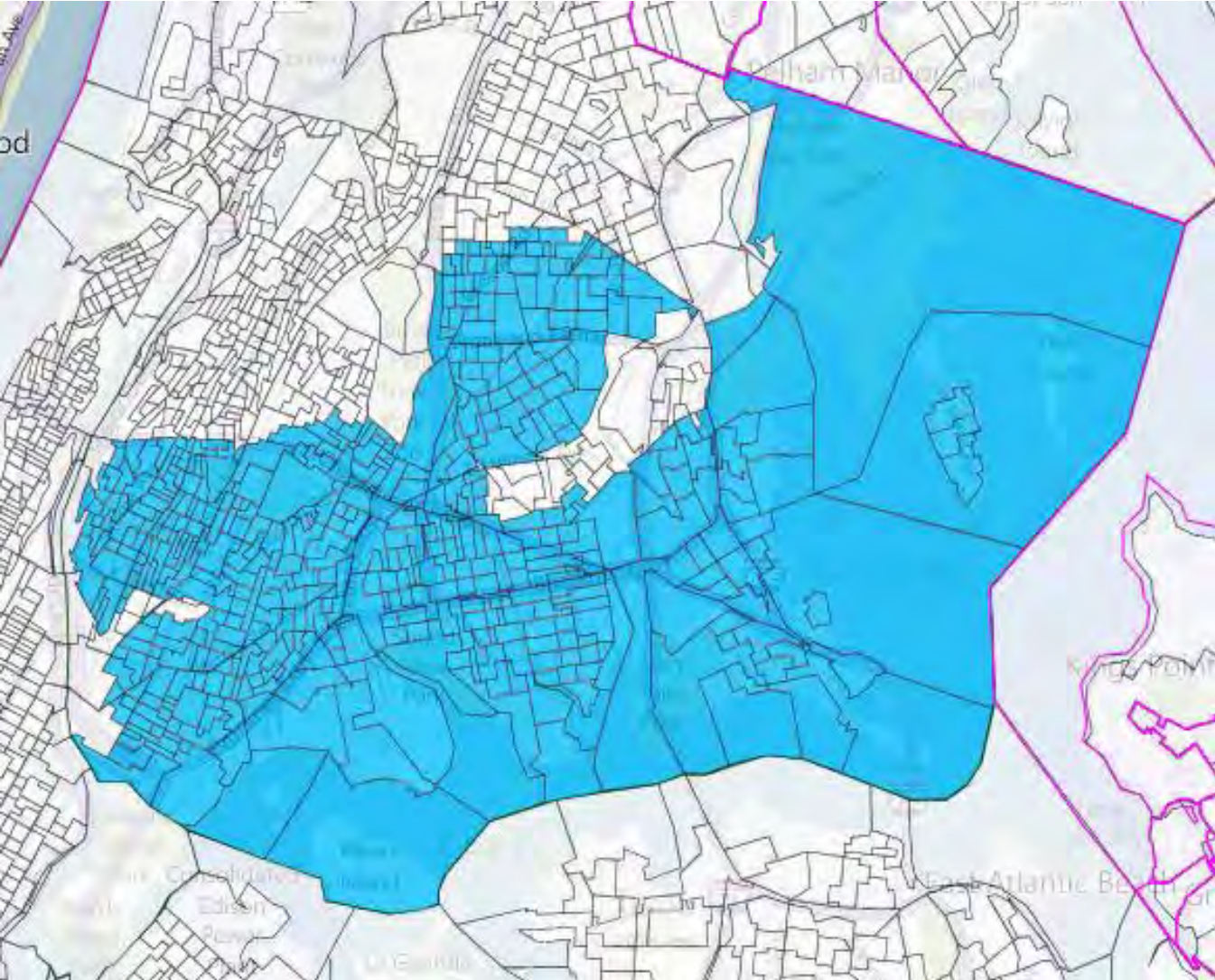


# Congressional District 15



CD 15		
All	Pop	%
Tot	717,626	
Wh	93,756	(13.1)
Bl	338,921	(47.2)
Hisp	242,093	(33.7)
Asn	24,343	(3.4)
Nat	1,926	(0.3)
Oth	16,587	(2.3)
18+	Pop	%
Tot	546,847	
Wh	81,077	(14.8)
Bl	260,919	(47.7)
Hisp	171,935	(31.4)
Asn	19,605	(3.6)
Nat	1,398	(0.3)
Oth	11,913	(2.2)

# Congressional District 16



CD 16		
All	Pop	%
Tot	718,039	
Wh	72,663	(10.1)
Bl	189,385	(26.4)
Hisp	421,296	(58.7)
Asn	21,105	(2.9)
Nat	1,774	(0.2)
Oth	11,816	(1.6)
18+	Pop	%
Tot	520,943	
Wh	61,764	(11.9)
Bl	137,768	(26.4)
Hisp	295,787	(56.8)
Asn	16,087	(3.1)
Nat	1,144	(0.2)
Oth	8,393	(1.6)

# Memo

To: Special Master Roanne Mann  
From: Bronx County  
Date: February 28, 2012  
Re: Redistricting in the Bronx

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For your consideration, we have supplied the accompanying maps with the understanding that they represent our best case scenario for redistricting Congressional lines that impact our county. The following is the supportive criteria that was considered while composing each map.

## Congressional District 14

Congressional District 14 would be comprised primarily of residents in New York County. In the Bronx, the district would contain parts of the Northwest Bronx that are in many ways viewed as an extension of New York County. The residents of this district are primarily latino, mainly with ancestry in the Dominican Republic. The sections of the Bronx represented in this map are a natural extension of the territory comprised in the Manhattan portion of the district. It is comprised of a growing latino demographic that will only increase over the next 10 years, according to trends.

## Congressional District 15

Congressional District 15 was developed as an identified community of interest. Many of the residents of the northern section of the district (northeast Bronx and Mount Vernon) are former residents or the descendants of residents from the New York County portion of the district. It seeks to link the remaining African Americans in New York County with their brethren in the Bronx and Southern Westchester, respecting the community of interest principle – composing close to a 50% African American district.

## Congressional District 16

Congressional District 16 due is wholly contained in the Bronx. This District contains parts of former CD 7 represented by Rep. Joseph Crowley. The district includes a major part of the district currently represented by Rep. Jose Serrano. Close to sixty (60) percent of the residents of the district are of Latin descent, and the communities contained are seamless in their integration and continuity. The Bronx should maintain a district that is wholly within its borders and District 16 fits that criteria. This district represents a community of interest as its residents share a milieu of services, infrastructure and living standards.



My name is Bob Naas and I live in the 25<sup>th</sup> NY Congressional District. I am an Industrial Designer living in a small village with exposure to all the major cities in our great country.

It seems reasonable to shape districts that enclose both large metropolitan centers and the surrounding smaller communities. But it does not seem reasonable to gerrymander districts to split up large communities with an overwhelming political bent for the purpose of gaining political advantage.

Everyday life in our district should consist of business done between our smaller communities and the larger, local metropolitan community. That "business" is economic, social, educational, medical, religious, etc. And it is all very local, within a 20 to 30 mile driving radius. The common interests/concerns of this "local" community, while day-to-day decisions/solutions may not necessarily be readily agreed upon, are specific interests and concerns of the local community. Our district is primarily made up of a major city, home of the NY State Fair, and many, many smaller communities.

The redistricting plans now being proposed by non-partisan groups and individuals seem more appropriate to the serving the common good of the local communities involved and their determining and achieving their local community goals.

To arbitrarily redistrict, with no attention to, nor sympathy toward focusing on the geographic integrity of the local community is not in the public interest. Disregard for the local community's common interests and issues, the common interests that bind the community together AS a community, is not in the public interest. Splitting up these local communities, through torturous gerrymandering for a political purpose should not be our goal. Serve our local communities and their local, common interests. Let us serve our communities, our LOCAL communities, not any political party. Let us be responsible in any redistricting.

Respectfully,

Bob Naas

To the Honorable Roanne L. Mann,

The notes for submitting a proposed map say that I should include a message that provides any necessary "supporting explanations and legal arguments." I am not a lawyer, and I have no particular legal arguments or precedents in favor of my maps. I have only common sense. Which based on some of the other submissions I've seen is clearly not a requirement for offering input, although perhaps it should be. To that end, I am sending in a map that I've drawn up based on very specific criteria indeed: rationality, compactness, and geography, rather than partisan breakdown, incumbent locations, and party politics.

You will notice that I am only submitting congressional district maps for the ten congressional districts that are slated to sit north of the greater New York City area. Being a resident of upstate, I don't feel qualified to make suggestions for the division of downstate, which poses far more difficult dilemmas in terms of racial, ethnic, and cultural makeup. New York City's residents are capable of offering thoughts on their own borders; we up here can comment on our own. And someone clearly needs to comment, since the proposals so far submitted have been atrocious.

The level of gerrymandering present in the former district lines was quite bad enough, giving rise to the "earmuff" district 28, a district 22 which looks like someone just wasn't even trying to be subtle anymore, and other similarly awkward creations designed to keep certain people in power. And as bad as those are, many of the alternatives now being offered are even worse. Simply put, it would be hard to draw a less coherent set of congressional districts than what have currently been proposed, unless your method relied on a drunken monkey with a dartboard.

Even the map drawn by Common Cause, a reform group, strikes me as lacking basic common sense. Two districts in their upstate map are entirely enclosed by other districts, and one congressional district stretches at least two hundred miles from the edge of Niagara County in the west nearly to Utica. I've gone on road trips shorter than the length of that district.

This, your honor, is the point of my submission: to show that an individual, with no special training or expertise in demographics, can produce in the span of a few hours a map which makes more sense than these so-called legislators could given months of wrangling. It is not that hard--it's just that they aren't trying.

Wherever possible, I have drawn district lines to coincide with county borders. Where this isn't possible, or where a district spans multiple counties, I have grouped together areas with similar interests and spheres of influence. For instance, the Finger Lakes together with the eastern side of Rochester; the western side of Rochester with its suburbs and areas along the Thruway and I-390 which are within the Rochester "sphere." Areas of the Southern Tier in two districts, one going with Binghamton, the other with Buffalo's southtowns.

The largest cities--Buffalo, Rochester, Syracuse, and Albany--are each split between two different congressional districts. In this way, each city receives additional representation in Congress, having two members concerned with its issues instead of one. This also doubles as a means to balance each district; purely urban or purely rural districts would amount to incumbent protection schemes, with Democrats in cities and Republicans in the countryside.

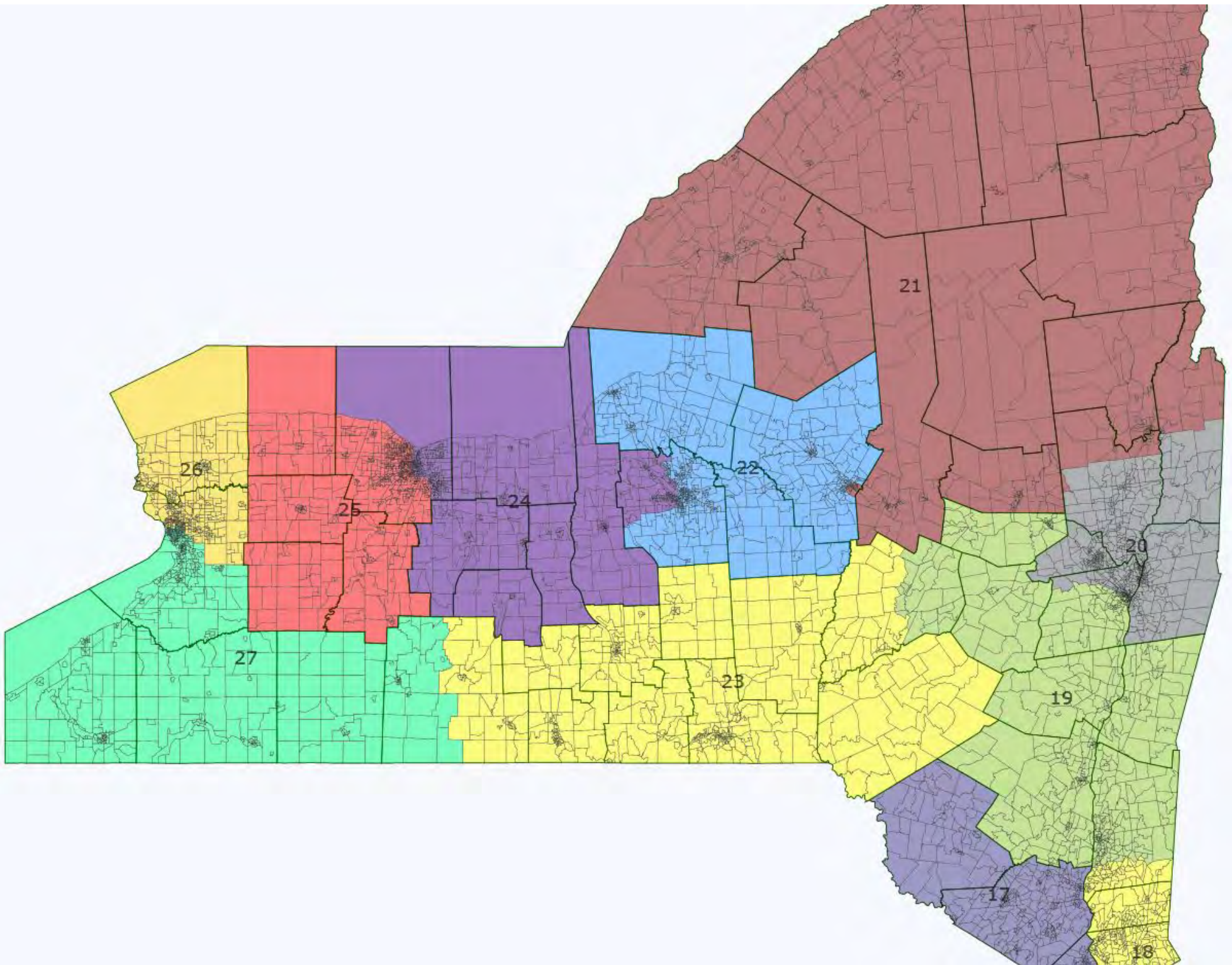
The allowable variance from an even population split in a congressional district is 0.5%, or approximately 3,580. In this map, none of the outlined districts vary from the even split by more than 400 people, or 0.055%.

Each district is compact and self evident in its layout; nowhere does the partisan breakdown define the shape of the districts, nor do they snake around "undesirable" people or areas. A representative shouldn't need airfare to travel from one end of their district to the other--it not only makes it more difficult for a non-incumbent to get elected, it does a great disservice to

the people living on the "far" end from where their representative is, with attention paid to them being rare and thin.

In summation, your honor, it is my attempt to emulate what a set of congressional districts should be; a means to represent the people of a given area in the best way possible, for their own good rather than the good of the party controlling the legislature or the incumbents choosing their voters. I hope my efforts interest you, and I wish you the best of luck in sorting out what is by any measure the tangled morass of New York State politics.

Sincerely,  
Adama W. D. Brown  
4551 Wilder Road  
Warsaw, NY 14569  
Adama.D.Brown@GMail.com  
(585) 350-6817





## **CD 12 TESTIMONY: MARTIN NEEDELMAN**

### **Introduction**

My name is Martin Needelman, a resident and community leader from Williamsburg, Brooklyn. Although I am Project Director & Chief Counsel of Brooklyn Legal Services Corporation, I make ~~his~~ <sup>these</sup> remarks only on my own behalf.

I'd like to thank the Court for giving the public the opportunity to comment on proposed plans despite a tight schedule.

### **Topic: Uniting North and South Williamsburg**

I strongly urge the Court to reject the division of North and South Williamsburg that is only seen as a prominent feature in one plan proposed by the Rose intervenors. Despite simple divisions of race, there have been two pre-cleared Congressional districting plans, in 1997 and 2002, which united these two communities despite differences in the Latino share between the Southside and the Northside. As parts of Williamsburg continue to experience demographic change, the Court should recognize the important uniting characteristics that transcend race and knit together this neighborhood.

In fact, there have been many different instances where outsiders have attempted to create divisions among the community as a whole. But the entire neighborhood is a community of interest, with shared issues and concerns for the future. As someone who is not Latino (although my wife is), but who comes from the predominantly Latino Southside, I can clearly attest to the commonalities which cross racial boundaries and have been recognized in 2 legislative plans for the 12<sup>th</sup> district and the draft of last decade's Special Master.

Ironically, splitting the district, as is proposed, would have the effect of undermining the effectiveness of one of the Latino communities key leaders, current Congressmember Nydia Velazquez, by disrupting her long term relationships with her existing constituencies that are significantly diverse.

I urge the court to not split Williamsburg on racial patterns and reject its manifestation in the Brooklyn portion of the map submitted by the Rose intervenors.

# RAYMOND J. DAGUE, PLLC

ATTORNEYS & COUNSELORS AT LAW

472 SOUTH SALINA STREET

SUITE 620 EMPIRE BUILDING

SYRACUSE, NEW YORK 13202

TEL. 315.422.2052

DAGUELAW.COM

March 2, 2012

The Hon. Roanne L. Mann  
United States Magistrate Judge  
U. S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

## **Re: Congressional Redistricting In Upstate New York**

Dear Judge Mann:

I am writing to submit my non-party comments to the New York State senate and assembly redistricting plans which are before you and upon which public comment is solicited.

As I understand the proposed maps, both the assembly plan and the senate plan lump Onondaga County (with its principal city Syracuse) into the same congressional district with Tompkins County (with its principal city Ithaca).

For generations, Tompkins County has always been part of the Southern Tier, and Onondaga County has been part of Central New York. These are natural communities with a compact focus of culture centered around these principal cities, and the surrounding area of each has always been part of each. They are served by separate television, radio and print media. For example, the Syracuse Post Standard is the principal newspaper for Central New York, and few people in the Southern Tier subscribe to it. Syracuse TV stations 3, 5 and 9 are not generally available in Southern Tier cities such as Ithaca. Likewise, the Ithaca Journal and the Binghamton newspaper are the principal newspapers for the Southern Tier. They do not circulate in Syracuse. Nor is Binghamton/Ithaca TV station 12 and the other Southern Tier TV stations able to be found in Syracuse, either on cable or by antenna (if anyone still uses antennae to get TV these days).

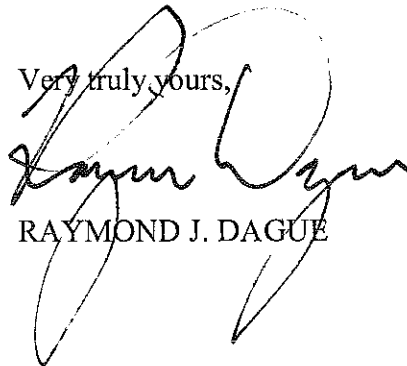
There is certainly nothing wrong with including other Central New York counties and communities such as Cayuga County, Madison County, or Wayne County in a Central New York congressional district. They are served by the Syracuse media. Also, the Southern Tier should be kept together consisting of Broome County (Binghamton), Tompkins County (Ithaca) and Chemung County (Elmira). However, it makes no sense to put a piece of Central New York such as Onondaga County in with a piece of the Southern Tier such as Tompkins County. Cortland County is generally considered part of Central New York, but that county also shares some of the characteristics of the Southern Tier, so that county could go either way.

I would urge rejection of both of these maps. The court should reconfigure what is currently the 25<sup>th</sup> congressional district (a Central New York district) so that it includes only those communities, and does not include any of the Southern Tier communities. Likewise, the Southern Tier communities should be in a district or districts which are in that region, and which do not include Central New York.

Any good student of American history knows about the bizarre dragon-shaped district which Elbridge Gerry was given around Boston to keep him in congress shortly after the founding of our nation. The Gerrymander is our modern legacy of this—districts carved up for political reasons based on the calculation of which party can win a seat, rather than districts which are based on geography, common communities, and the zones of local media coverage which exclusively serve those communities. I do not pretend to know about the communities of downstate, but here in upstate New York the communities are quite separate and distinct. Any redistricting plan should take such natural communities into consideration. The current plan submitted before you does not do so.

As such, this court should reject both of the maps which you have before you, and should retain the natural communities of Central New York and the Southern Tier in separate and distinct congressional districts.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Raymond J. Dague', written over a circular stamp or seal.

RAYMOND J. DAGUE

RJD/km

**David Nir**  
230 E. 88th St., Apt. 4B  
New York, NY 10128  
(212) 655-9641  
davidnir@gmail.com

March 7, 2012

By public online submission system

Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Favors v. Cuomo*, No. 11-cv-5632

Dear Judge Mann:

I am a lifelong New Yorker and a registered New York voter, and I submit these comments in my capacity as an individual. I have long been interested in public policy, which is why I have followed these proceedings from the outset. I learned of the court's draft Congressional map after it was released earlier this week and reviewed the map as carefully as I could, given the understandably short window for comments. I have discovered a small number of issues which I believe should be of concern to the court and which I feel must be addressed in order for this plan to properly represent New Yorkers.

Beginning in the western part of the state, of particular concern is the proposal to separate the city of North Tonawanda and a portion of the city of Niagara Falls<sup>1</sup> from their home county, Niagara County. North Tonawanda and the portion of Niagara Falls are placed in the same Congressional District (the 26th) as the city of Buffalo. It would be much fairer to the voters of western New York if Niagara County were kept whole. Mathematically, there is no reason to separate Niagara at all: as proposed, both the 26th and 27th Districts would cover portions of Niagara and Erie counties. Niagara County could be reunified by moving the 81,744 Niagara County residents currently assigned to the proposed 26th District into the 27th District, in exchange for moving 81,744 Erie County residents (of 283,077 currently assigned to the

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<sup>1</sup> Seventeen residents of the City of Niagara Falls reside within the proposed 27th District. The remaining 50,176 residents reside within the proposed 26th District.

proposed 27th District) into the 26th District. The net effect of such a change would reduce, by one, the number of counties split in this plan.

I also note that one block of Genesee County, with a population of zero, is assigned to the proposed 25th District. This block, Block 1004 of Census Tract 9501, could be restored to the 27th District—thereby preserving the integrity of Genesee County—with no effect on population equality, a rule the proposed plan honors in full.

Further, the proposed 23rd and 27th Districts jointly split no fewer than three counties and four towns. Pieces of each of Livingston, Ontario, and Wyoming Counties are located in both districts. One of these “splits”—the division of the town of Canandaigua in Ontario County—is unnecessary. One block of that town, Block 3010 of Tract 506.01, contains zero population and is assigned to the proposed 23rd District, while the remainder of the town is assigned to the proposed 27th District. As above with Genesee County, this block could be restored to the 23rd District with no effect on population equality, and with the benefit of preserving the integrity of the town of Canandaigua.

In addition, the town of Nunda in Livingston County and the towns of Arcade and Pike in Wyoming County are also subdivided. In each of these instances, the vast majority of the population is located in the proposed 27th District with a small remainder in the proposed 23rd District.<sup>2</sup> In total, 1,439 residents of Livingston and Wyoming Counties are assigned to the 23rd District, while the remaining 106,109 residents are assigned to the 27th District. These 1,439 residents could be moved from the 23rd District to the 27th District in exchange for 1,439 of the 64,197 Ontario County residents currently assigned to the 27rd District. Doing so would preserve the integrity of both Livingston and Wyoming Counties and, as Ontario County is already split between the two districts, yield two fewer counties split between districts.

Moving further east, I notice similar issues in the division of Montgomery and Rensselaer Counties. As proposed, 15,613 residents of Montgomery County are assigned to the 19th District, while the remaining 34,606 residents are assigned to the 20th District. Rensselaer County is similarly divided: 64,349 residents are assigned to the 19th District, while 95,080 residents are assigned to the 20th District. This unnecessary division of counties can also be remedied in a straightforward manner: the 15,613 residents of Montgomery County currently assigned to the 19th District can be moved to the 20th District, in exchange for 15,613 of the 95,080 residents of Rensselaer County currently assigned to the 20th District. This would serve to reunite Montgomery County and reduce by one the number of split counties.

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<sup>2</sup> In the town of Nunda, 412 residents are assigned to the 23rd District while the remaining 2,652 are assigned to the 27th District. In the town of Arcade, 231 residents are assigned to the 23rd District while the remaining 3,974 are assigned to the 27th District. In the town of Pike, 7 residents are assigned to the 23rd District while the remaining 1,107 are assigned to the 27th District. The town of Ossian, in Livingston County, containing 789 residents, is also assigned in its entirety to the 27th District.

Continuing further downstate, I observe similar issues in both upper and lower Westchester County. In upper Westchester, the towns of New Castle, North Castle, and Yorktown are all divided between the proposed 17th and 18th Districts.<sup>3</sup> The number of towns split can also be reduced here: the 7,398 residents in these three towns can be assigned to the 17th District. In exchange, 7,398 residents from the town of Mount Kisco could be moved from the 17th District to the 18th District. This movement would result in only one town being split between the two districts, instead of the current three.<sup>4</sup>

In lower Westchester, the towns of Greenburgh, Rye, and Scarsdale are all divided between the proposed 16th and 17th Districts.<sup>5</sup> Instead of splitting three towns, the following adjustments would allow only one town to be split. The town of Rye would be reunited in the proposed 16th district, a shift of 38,314 residents from the 17th District to the 16th District. In exchange, the 20,790 residents of the town of Greenburgh and 16,937 residents of the town of Scarsdale currently assigned to the 16th District would be moved to the 17th District. This would preserve the integrity of the towns of Greenburgh, Scarsdale, and Rye. However, in order to preserve population equality, an additional 587 residents would need to be moved from the 16th District to the 17th District. These residents could come from the town of Eastchester, the town of Mamaroneck, the city of New Rochelle, or the city of Yonkers. Regardless of selection, the result would require only one jurisdiction to be split between the 16th and 17th District, instead of the current three.<sup>6</sup>

I would also like to briefly explain why these particular concerns that I have identified deserve to be remedied. What unites these issues is that they all concern the reunification of existing political units that have long been part of the fabric of New York civil culture. I am aware of no

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<sup>3</sup> In the town of New Castle, 15,290 residents are assigned to the 17th District and 2,279 residents are assigned to the 18th District. In the town of North Castle, 6,889 residents are assigned to the 17th District and 4,952 residents are assigned to the 18th District. In the town of Yorktown, 35,914 residents are assigned to the 17th District and 167 residents are assigned to the 18th District.

<sup>4</sup> Alternate approaches could also serve to reunite two of the three currently split towns. For example, the 7,231 residents of the towns of New Castle and North Castle assigned to the 18th District could be moved to the 17th District, and 7,231 residents of the town of Yorktown (of 35,914 currently assigned to the 17th District) could be moved in exchange to the 18th District. This adjustment would result in only the town of Yorktown being split. Similarly, the 5,119 residents of the towns of North Castle and Yorktown assigned to the 18th District could be moved to the 17th District, and 5,119 residents of the town of New Castle (of 15,290 currently assigned to the 17th District) could be moved in exchange to the 18th District. This adjustment would result in only the town of New Castle being split.

<sup>5</sup> In the town of Greenburgh, 20,790 residents are assigned to the 16th District and 67,610 residents are assigned to the 17th District. In the town of Scarsdale, 16,937 residents are assigned to the 16th District and 229 residents are assigned to the 17th District. Finally, in the town of Rye, 7,614 residents are assigned to the 16 District and 38,314 residents are assigned to the 17th District.

<sup>6</sup> The alternative method of the reuniting of the town of Rye in the 17th District would necessarily divide the village of Mamaroneck between the 16th and 17th Districts.

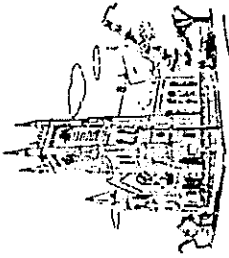
expressions of any desire from the residents of these areas for their towns or communities to be split apart politically. While I am unable to provide precise figures at this time given the short time available for public comment, I believe it is possible to reunite these towns and counties without compromising at all on the important principle of population equality.

Given the brief time for public comment that is available, I feel it is important that this court do as much as possible to minimize any such unwanted separation. I am aware, of course, that courts face particular challenges in redistricting when the political mechanisms of a state have failed to do so. But these pre-existing units of government (and life) should be given as much respect as possible in whatever final plan the court produces.

Sincerely,

/s/ David Nir  
David Nir

# Bronx Memorial Baptist Church



Rev. Carlton M. Mack, Pastor  
Arthur Lopez, Chairman Election Board  
Bernice Beckwith-Shipman, Chairperson Trustee Board  
Carmel Sutton, Treasurer  
Dor Charles Dempster, Supt. Sunday School  
Angela Roper, Church Cook  
Ezzee Gant, Church Secretary

484 Washington Avenue  
Bronx, New York 10238-3324  
Office Phone (718) 638-6121  
Fax (718) 339-8702  
www.bronxmemorialbaptist.org

To The Honorable Roanne Mann,

I am writing this email staunchly opposing the courts proposed congressional lines for the new NY 8 district. These lines politically dilutes the presence of our traditional interests of our community. Many of the neighborhoods in this new district have very different interests which can ultimately diminish the effectiveness of any eventual representative.

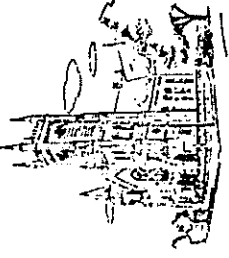
As a member of the community, I have worked to encourage others to participate in the political process. It has been difficult to do that when these redrawn lines appear to look like gerrymandering and a by product of manipulative politics. I believe that if these proposed lines stay as such, many will gain even more distrust in our political system. I trust your wisdom and objectivity in this process.

Moreover, I strongly think that these lines should be readjusted so that the neighborhoods of Clinton Hill, Fort Greene and Prospect Heights should be included in the new NY 8 Congressional district. Thank you for your consideration.

Sincerely,

Concerned Citizens

# Bronx Memorial Baptist Church



Rev. Carlton M. Mack, Pastor  
Arthur Lopez, Chairman Election Board  
Bernice Beckwith-Shipman, Chairperson Trustee Board  
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As a member of the community, I have worked to encourage others to participate in the political process. It has been difficult to do that when these redrawn lines appear to look like gerrymandering and a by product of manipulative politics. I believe that if these proposed lines stay as such, many will gain even more distrust in our political system. I trust your wisdom and objectivity in this process.

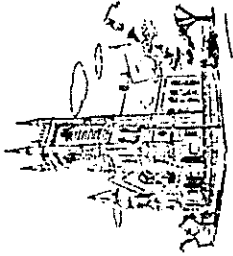
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Sincerely,

Concerned Citizens



# Broton Memorial Baptist Church



Rev. Clinton M. Mann, Pastor  
Arthur Loyola, Chairman Deacon Board  
Brenda Bechtel-Shoppens, Chairperson Trustee Board  
Darnel Sutton, Treasurer  
Drs. Charles Durringer, Supt. Sunday School  
Angela Rogers, Church Clerk  
Ecclesia Gant, Church Secretary

144 Madison, 10th Floor  
Brooklyn, New York 11238  
Office Phone: (718) 638-6121  
Fax: (718) 353-8702  
www.brotonmemorialbaptist.org

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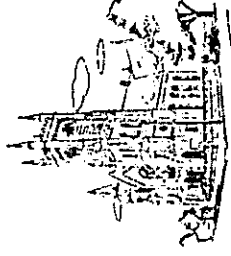
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Sincerely,

*Ecclesia Gant*  
Concerned Citizens

# Broton Memorial Baptist Church



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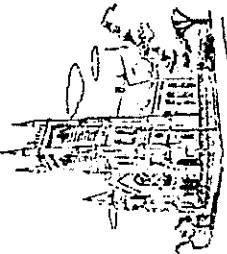
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Sincerely,

*Shirley D. Bland*  
Concerned Citizens

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Sylvia Bickel, Stewards, Chairperson, Trustee Board  
Calvin Sullivan, Treasurer  
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Angela Taylor, Church Clerk  
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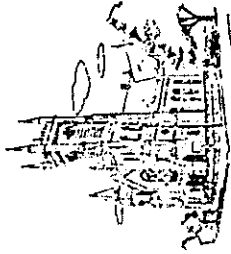
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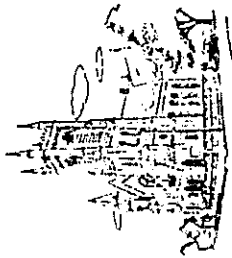
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Concerned Citizens

# Thronton Memorial Baptist Church



Rev. Carlton M. Miller, Pastor  
Arthur Lojice, Chairman, Deacons Board  
Ronald Baker-Stephens, Chairperson, Music & Soloists  
Curtis Sullivan, Treasurer  
Lisa, Church Computer, Staff, Sunday School  
Angela Popper, Church Clerk  
Bible Study, Church Society

484 Washington Avenue  
Brooklyn, New York 11238-3334  
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Fax: (718) 359-8702  
www.thronmema.org

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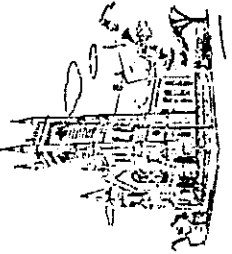
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Sincerely,

*Delina Johnson*

Concerned Citizens

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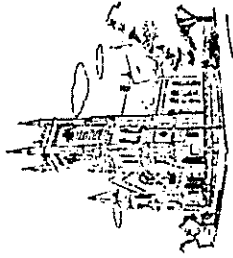
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Sincerely,

*Margaret Watson*

Concerned Citizens

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Bernard Belland-Stephens, Chairperson Trustees Board  
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Dora Charles Dempster, Supt. Sunday School  
Angela Roper, Church Clerk  
Esther Gant, Church Secretary

484 Washington Avenue  
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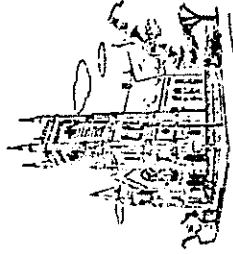
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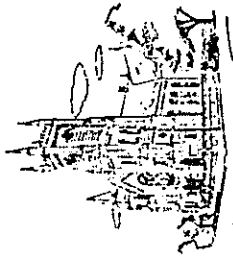
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Angela Rapier, Church Clerk  
Ebbie Guitt, Church Secretary

484 Washington Avenue  
Brooklyn, New York 11239-2304  
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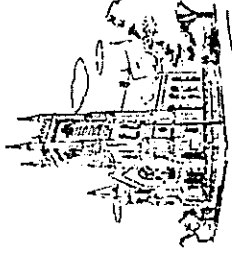
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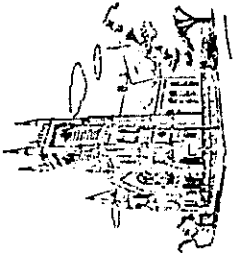
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Angela Roper, Church Clerk  
Bobbie Gant, Church Secretary

484 Washington Avenue  
Bronx, NY 10451  
Office Phone (718) 638-6121  
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www.bronxmemo.org

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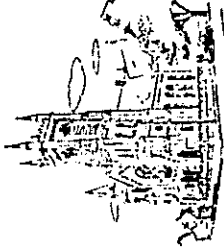
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Angela Roper, Church Clerk  
Bobbie Gant, Church Secretary

154 Avenue J, Box 464  
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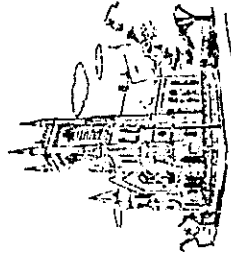
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454 Madison Ave. 12th Fl. 10017  
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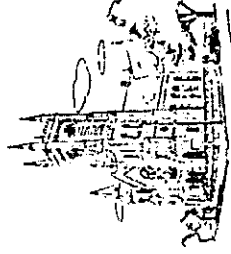
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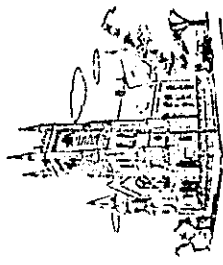
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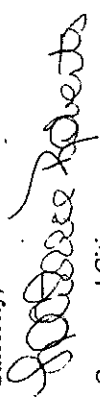
484 Hudson Ave. 4th Fl.  
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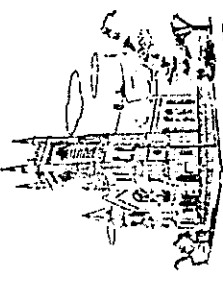
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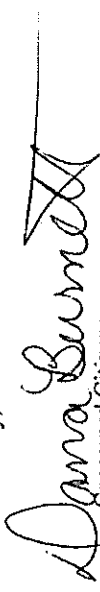
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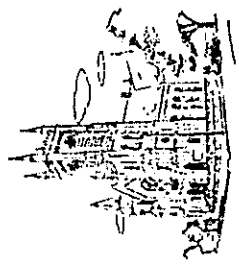
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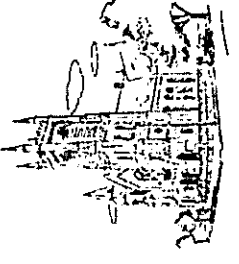
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*James E. Morehead*

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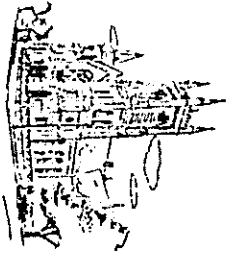
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Sincerely,  
*James E. Morehead*

Concerned Citizens

# Abraham Memorial Baptist Church

Rev. Carlton M. Miller, Pastor  
Arthur L. Esquire, Chairman, Deacons Board  
Bernard Bellard-Stimpson, Chairperson, Trustee Board  
Darius S. Sutton, Treasurer  
Dana Charles Dempster, Supt. Sunday School  
Angela Popper, Church Clerk  
Beccie Gant, Church Secretary



154 Montgomery Avenue  
Brooklyn, New York 11238-4400  
Office Phone: (718) 626-6171  
Fax: (718) 522-8702  
www.abrahammemorialbaptist.org


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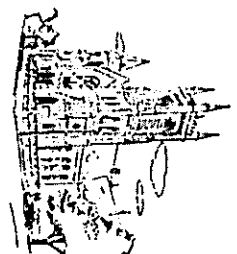
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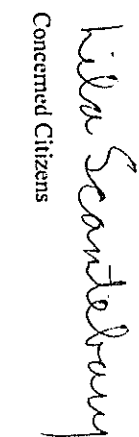
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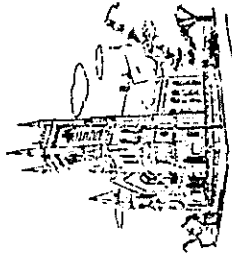
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Dca. Charles Dempsor, Supt. Sunday School  
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Bette Gunt, Church Secretary

484 Washington Ave. No. 2  
Brooklyn, New York 11238-2334  
Office Phone: (718) 638-6121  
Fax: (718) 332-8732  
www.thrononmemorialbaptist.org

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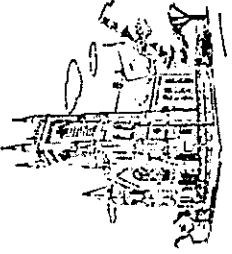
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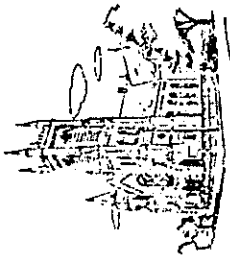
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Arthur L. L. Chairman, District Board  
Bronx Board of Stipends, Compensation Trustees Board  
Dorothy S. S. Treasurer  
Dorothy S. S. Sunday School  
Dorothy S. S. Church Clerk  
Dorothy S. S. Church Secretary

484 Washington Avenue  
Bronx, New York 11238-2304  
Office Phone (718) 538-6121  
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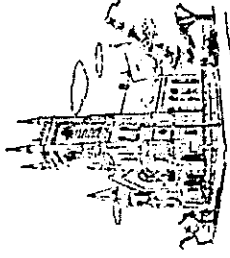
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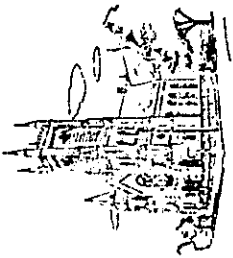
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GARVEY J. MCLEAN

Concerned Citizens

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Beverly Bostick Stephens, Chairperson Trustee Board  
Curtis Sutton, Treasurer  
Dad Clarke, Computer Supt. Sunday School  
Arlene Hester, Church Cook  
Scottie Gault, Church Secretary

484 Washington Avenue  
Brooklyn, New York 11238-4304  
Office Phone (718) 638-6121  
Fax (718) 359-8702  
www.brownmemorialbaptist.org

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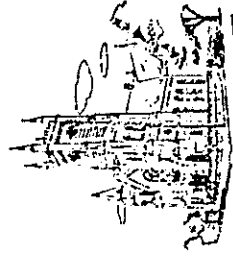
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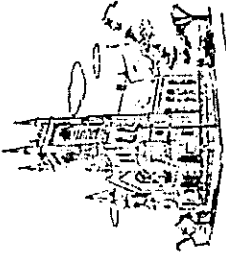
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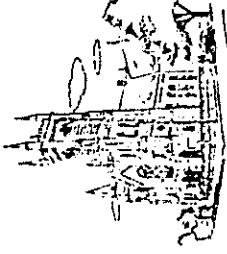
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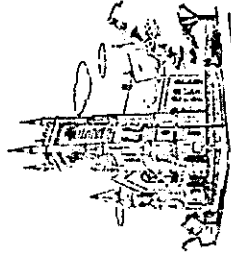
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484 Madison Ave., 4th Fl.  
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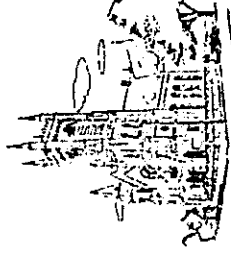
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Sincerely,

*Jillie White*  
Concerned Citizens

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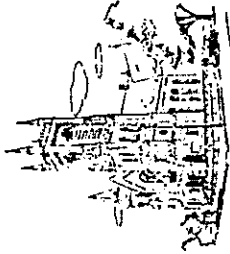
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Sincerely,

*Mildred Smith*  
Concerned Citizens

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Arthur Lejeune, Chairman Deacons Board  
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Durrell Sullivan, Treasurer  
Cecil Charles Compston, Supt. Sunday School  
Anjela Popar, Church Clerk  
Suzanne Gant, Church Secretary

164 Madison Street Ave. W.  
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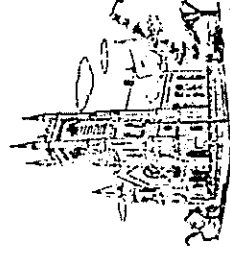
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Concerned Citizens





Magistrate Judge Roanne L. Mann:

I urge the court to reject the proposed Congressional redistricting plans put forward by both the New York State Assembly and the State Senate.

Both legislative bodies have failed in their duty to agree on any kind of commonsense reapportionment in a timely manner. Redistricting, when conducted by elected officials, will always have an element of politics as each political party seeks to gain advantage: that's unavoidable. New York's redistricting has become a hyper-political process with incumbent Congressman employing lobbyists and neither party seemingly working towards the common good.

These proposed districts were not drawn based on compactness, geography, or commonality of interests, but for purely partisan reasons. In respect to the district I currently represent, these lines were produced with the intention of determining a winner of the election before the race has even begun.

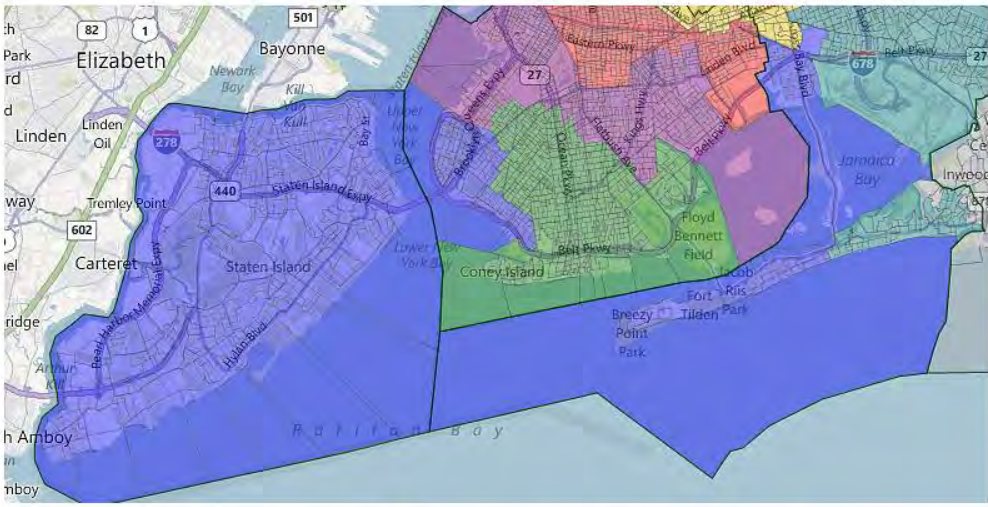
The product of over-politicized redistricting is anathema to most New Yorkers. In the political process of redistricting, Assembly and Senate members have abandoned good governance in the interest of self-preservation, political advantage and personal ambition. They appear to have been swayed by special interests and Albany lobbyists.

The redistricting plans submitted to this court by non-partisan organizations and citizens are uniformly more compact, reasonable and, frankly, set up more competitive seats in Congress, which is surely in the best interests of the people of New York and the United States. The House of Representatives is supposed to reflect the will of the people because Congressmen are required to face re-election every two years. Drawing totally safe Democrat and Republican Congressional districts has the effect of making the House a rest home for career politicians who never face a competitive election.

Again, I ask this court to turn down the Assembly and Senate redistricting plans in favor of a more common sense approach.

Sincerely,

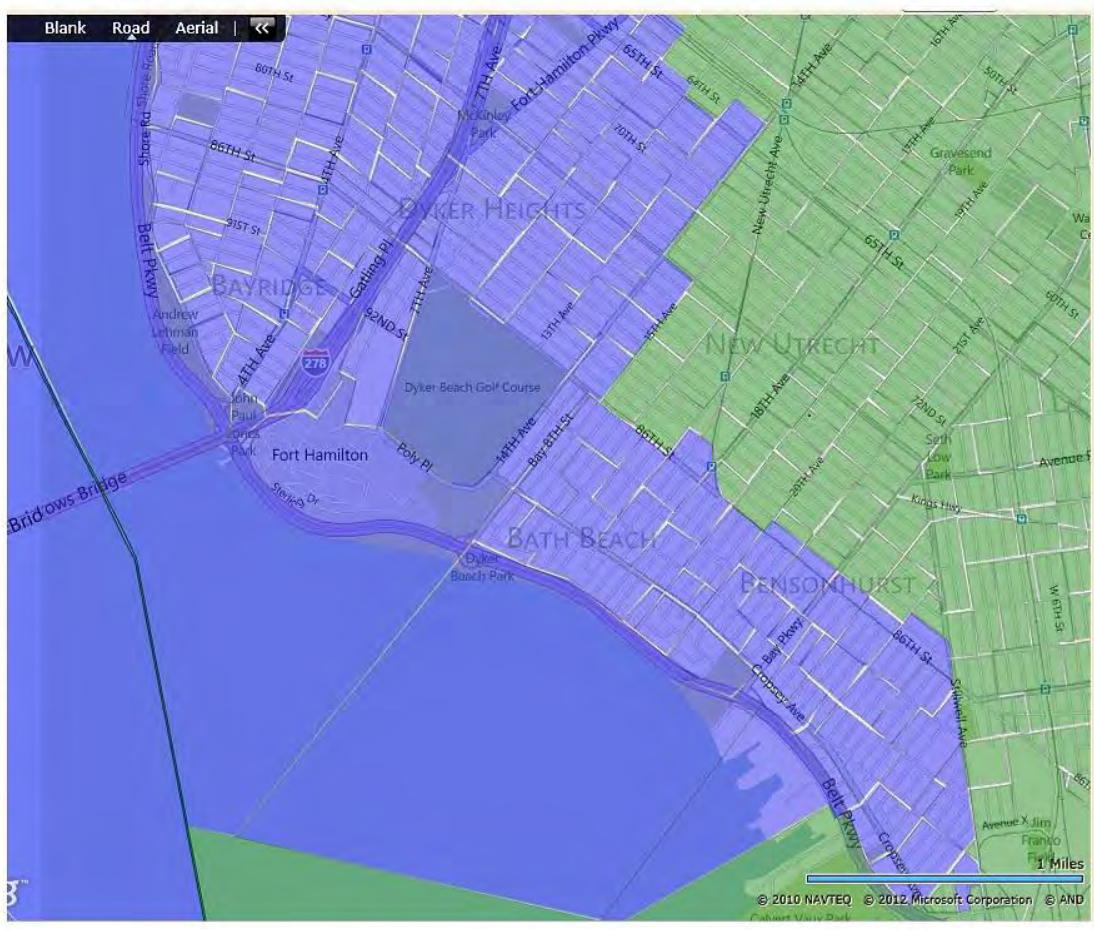
Paid for and authorized by Buerkle for Congress



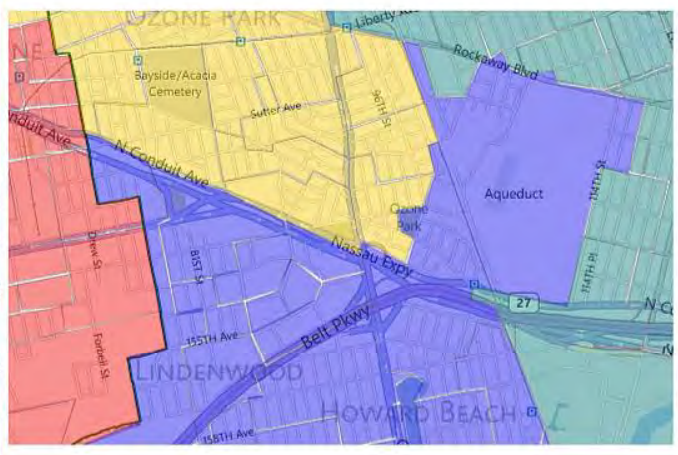
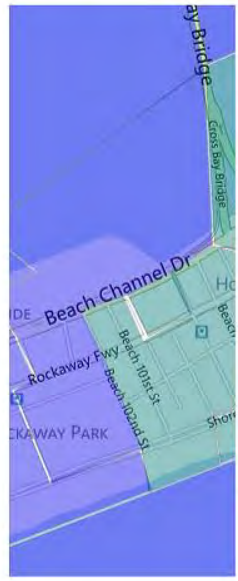
**District 1**  
(similar to the current district 13)

**district 1**  
**census**

CD 1		
Total Population		
All	Pop	%
Tot	709,684	
Wh	451,912 (63.7)	
Bl	48,201 (6.8)	
Hisp	114,528 (16.1)	
Asn	82,106 (11.6)	
Nat	939 (0.1)	
Oth	11,998 (1.7)	
Voting Age Pop		
18+	Pop	%
Tot	553,370	
Wh	368,128 (66.5)	
Bl	34,636 (6.3)	
Hisp	78,973 (14.3)	
Asn	63,515 (11.5)	
Nat	684 (0.1)	
Oth	7,434 (1.3)	



**Close up**  
**of the**  
**borders of**  
**district 1**



District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Rosemarie	Andersson	12 Downing St	11238
Gerald	MAYES	195 McLaughley Ave, 1514	11205
Patricia	Brown	427 St. Johns Pl. 11238	
Lois	Brown	419 Decatur St 11233	
Favata	Brown	4069 E 52 <sup>nd</sup> Street Bklyn ny 11203	

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Mary	Bethes	116-12 198 St Albany NY	11412
RUTH PETTE	PETTE	550 GREENE AVE BRLYN NY	11216
Thom	M-Gregor	501 LeFerts ave Brooklyn	11225
CARLO	CARMONA	2326 E. 15 St Bklyn NYC	11229
Cora	Williams	1187 Greene ave Bklyn NY	11221
Tavis	DAVIS	219 LeFerts St.	11212
Joan	Grandall	584 Monroe St Bklyn NY	11221
Clinton	Muller	15 St. Francis Pl. Bklyn NY	11216
Maura	Shlman	21 St. James Pl #2N Bklyn NY	11238
Tiffany S.	Robinson	609 Polyz Avenue Apt. 2B	11212
Foster M. Ziddle Man	Hamheite	1746 Broadway) Bklyn, NY	11207
Geon	Brown	327 Sumner Bklyn NY	11233

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Marlon	Davis	534 Ralph Ave	11233
FRANCIS	CARMONA	2326 E. 15th St	11225
MRS SENNY	CANNADY	PO Box 630 Bldgm NY	11238
FRANK JEROME	DAPKE	30 KENNETHS Rte Bldgm NY	11238
Barbara	Richards	500 Washington Ave Bldgm apt 42	11238
T. Andy	Richards	500 Washington Ave Bldgm apt #5	11238
M. Ann	McFarland	1850 Avenue B Bldgm NY	11221
Betty	Dong	1439 Fulton St Bldgm NY	11216
Janet	Kulis	281 Coville Ave Bldgm NY	11207
Larissa <del>Leaper</del>	Leaper	365 Clinton Ave apt #20	11239
Nedra	Burke	83 Madison St Bldgm	11238
Kaseem	Abdulk-Akbar	23 Madison St Bldgm	11238

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Thomas	King	111 Bridge St BK NY	11261
Margaret	William	51 <del>Stuyvesant</del> AS Bklyn N.Y.	11218
Catherine	Delise	733 Divisadero St Brooklyn NY	11221
Angela Roper	Roper	480A McDonald St	11233
Emma	Moses	823 Brooklyn Ave #223 Bklyn	11203
DeNeus Brulard	Breward	315 Beach 63rd St. Avenue N.Y.	11692
Brianne JeeBongue		1200 Marcus Gunnery Blvd	11256
Alpha	Cobb-Harvey	131-57 226 <sup>st</sup> Laurelton Queens NY	11413
Isidore	Hunter	446 Kingston Ave. #14, B'klyn 11235	
John M.	Ridgers	183 Gates Ave Bklyn N.Y. 11238	
Barbara	O'Toole	401 8 <sup>th</sup> Ave #52 11215	11215
Bobbi	Lindsay	401 8 <sup>th</sup> Ave #52 11215	11215

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Raymond	Rosenstein	90 East 35th St Brooklyn NY 11238	
Henry	Rothman	260 W 42nd St # 6 130 LEFFERTS PL BKLYN, NY 11238	
DIANE	BROWN	584 Farraguta Bklyn NY	11234
Emmie Myers	Myers	363 Greene Ave. #1 Brooklyn NY	11216
Nicole	Hamilton	77 Gardfield Pl Brooklyn NY	11215
Carl	Parles	111 Bridge St Brooklyn NY	11201
MARIE	Smith	475 Washington Ave Brooklyn NY	11238
Kendrea	ROSS	259 CLEMMONT AVE Brooklyn NY	11205
DARRYL	COPELAND	347 Bch 73rd St Averaus NY	11693
PHILIP	GROVES	307 Castle Hill Ave Brooklyn NY	10473
Pamela	ROSS	111 Bridge St Brooklyn NY	11201
Zaika	DORRMAN		

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Paul	Stanley	695 Belmont Ave, Bklyn NY	11207
Flagenta	Stanley	695 Belmont ave, Bklyn NY	11207
Kinda	SPROCKS	1400 LINDEN ST BROOKLYN NY Doss Dean St Brooklyn NY	11235
Diane	Neussim	450 Clinton Ave Bklyn, NY	11238
Rockelle	Davis	418 Decatur Street Bklyn, New York	11233
RODNEY	HOJCEIT	15 Quincy street Bklyn N.Y.	11238
MARNE	SISIRANK	149 THOMAS STREET BROOKLYN NY	11233
OHIV	PARATO & (S)	204 Lexington Ave NY	11215
FRANZIS	FRANZIS	684 JEFFERSON AVE	11221
BETTY	LITTLE	71a Beverley Rd	11218
RACHEL	SPICING	15 St. Francis Pl	11216
TIMOTHY	COY	155-48 151st Avenue NY 11434	



District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Joanne	Bobb	5 Berdorget 11th St Bklyn	11236
Michael	McGriff	475 Carlton Ave Brooklyn	11238
Georgie	Lee	1506 Sterling Place Bklyn, NY # 3B	11213
Joanay	Winfield	240 Madison St #14D NY, NY 10002	10002
KEVIN	Brown	996 STANFORD AVENUE BRADWIN, N.Y., 11510	11510
CYNTHIA	PERRSON	451 CLINTON AVENUE #5D Brooklyn, NY	11238
Henry	Singletary	195 Willoughby Avenue #G15 Brooklyn NY 11205	11205
Lauron	McFunder-Ray	484 Halsey St Bklyn, NY <del>11233</del>	11233
Johnnie	McFowler	484 Halsey St, Bklyn, New York	11233
Steve	Rivers	N/A	N/A
Wanda	Wheeler	695 Belmont Ave Bklyn, NY	11204
Danna	Winters	695 Belmont Ave Bklyn NY	11207

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Grace	Clarke	624 Park Place, Bklyn NY 11238	11238
Enid	Clarke	624 Park Place, Bklyn NY 11238	11238
Delano	Clarke	624 Park Place, Bklyn NY 11238	
Shomari	Clarke	624 Park Place, Bklyn NY	11238
Trinette	Koonce	1266 New York Ave, Bklyn, NY 11203	11203
Sharell	STERMAN	32 Lenox Rd, Brooklyn, N.Y. 11226	11226
Dwone	Winfield	391 East 4th Street, N.Y. N.Y.	10009
Tudy	Gibbs	290 Putnam Ave, Bklyn NY	11216
Shantell	McDade	1444 Hekimer St Brooklyn	11233
Melvin	McDade	1444 Hekimer St. Bklyn NY	11233
Crystal	Groves - Gunn	347 Beach 73rd St. Avenue NY	11692
Kevin	Gunn SK	347 Beach 73rd St Avenue NY	11692

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Tracy	Easton-Gibby	333 Jefferson Ave Bklyn NY 11216	
Daisy	Shavers	1273 E 87 <sup>th</sup> St Bklyn NY 11236	
Anita	HOOD	1578 E 53 <sup>rd</sup> St Bklyn 11234	
Moreta	HOOD	88 Hull St Bklyn NY 11233	
Jacqueline Carott		414 Sutter Ave	
Carolyn	Haskins	140-40 171 St	
Mary Shelton		135 Washington, Bklyn	
Bettie	Patt	258 Greene Ave Bklyn 11238	
Arlchi	C.	103-79 Glenwood Pl Bklyn 11238	
CORA	FLANDERS	392 87 <sup>th</sup> JOHN'S PL. Bklyn N.Y.	11238
Tina	DOR	1720 Bedford Ave TE	
Ruth	FAULKNER	987 WHELAN ST Bklyn	11207

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Terame	Cunningham	400 Clinton Ave Apt 6C Brooklyn NY	11238
Eddie	SWEETHEEN	60 FT GREEN PL 103	11222-2345
Monte	Chandler	505 Court St St Brooklyn	111
Arthur	Segre	735 Kinnard Ave Brooklyn	11208
Gda	Meyer	1373 Bklyn Ave Brooklyn NY	11203
Mary	Zloy	1443 Bedford Ave. Brooklyn NY	11216
Charene	Eley	1403 BEDFORD AVE BROOKLYN	11216
Tanea	Flanders	122 Ashland Pl. Bklyn, NY.	11201
Kim	Beck	597 6th Bk, NY	11215
Diondra	Brougham	1503 E. 5 and A Brooklyn NY	11234
Kinneel	Fanner	130 Lefferts Place # 6C Brooklyn NY	11238
Datchin.	Farris	105 Dumay St #2C Brooklyn NY.	11258

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Michelle	Davis	494 Jefferson Ave, #4 Bklyn NY	11221
Ivy	Ward	130 Cambridge Pl #5 Bklyn, NY	11238
Zenzile	Keith	116 Cambridge Pl #4 <sup>A</sup> Bklyn, NY	11238
Hassan	Keith	116 Cambridge Pl #4 <sup>A</sup> Bklyn, NY	11238
Dorenda	Stokely	116 Cambridge Pl #4 <sup>C</sup> Bklyn, NY	11238
Clarence J	Elliott	644 Marcy Ave, Bklyn NY 11206	11206
Samantha	Pitre	87 South Portland Ave, Bklyn, NY <del>11217</del>	11217
Evelyn	Jones	103 Bloodbome St, Bklyn, NY	11221
Michael	Gariffan	91639 Pacific St Bklyn, NY, 11213	—
Bessie	Lamar	482 Hancock St Bklyn NY	11233
Karida	Smart	295 Clinton Ave E 3 <sup>rd</sup> Fl Bklyn NY	11205
Annette	Austin	2425 Nostrand Ave #301, Bklyn NY 11210	11210

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Jaqueline <del>Robertson</del>	Robertson	499 Crown Street	11225
TODD	MORISON	534 Bergen St	11217
Darren	Veracruz	5004 4th Ave	11220
Lois	Baxton	1000 St Johns Pl	11243
Mary <del>Leffler</del>	Rogee	756 E 52 St	11223
F. <del>St</del>	Johnson	365- Clinton Ave # 5F	11238
Rochelle	Ross	319 Monroe St BK NY	11216
Virginia	B Neer	149 Baykules Ave Bkfr	11213
Crystal	Handsome	810 Halsey St Bklyn, NY	11216
Shandra	Fultrino	13109 178 St Jamaica NY	11434
Rebecca	Stanlock	79 Van Ness	11215
Sheila	Dove	27 St Annes Rd Bklyn NY	11205

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Freddie	MEYER	1373 Bklyn Ave, Bklyn NY	11203
Mildred	Smith	465 Cullen Ave #9 Bklyn NY	11238
Teresa	Graft	290 Mueson St, Bklyn NY	11216
Monica	Williams	22 Rogers Ave #4 BK, NY	11216
Terisha	Morgan	3101 Ocean Ave BK, NY	11226
Evelyn	Rivers	80 CLIFTON PLACE BK, NY, NY	112
Maxine	Brooks	<del>2245</del> 2245 Dix Ave, <sup>Ft</sup> Rockaway NY	11691
Loranda C	Cobb	131-51 226 St Lawrence, New York	11403
Louise	Webster	1015 Lincoln Pl, Bklyn, NY	11213
Barbara	Shultz	115 Asplead Pl. Bklyn NY	11201
Janet	Nixon	931 Park Pl. Bklyn NY	11232
ROBERT H	JOHNSON	210 Cuyler Av. 11th Bklyn	11205

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
ARTHEA	BAILEY	18 Pendergat 12 Street, Bklyn NY	11236
Melvin	BROWN	355 Clatral Av 11E Bklyn NY	11238
Curtis	HUNTER	415 Washington Ave Bklyn NY	11238
Sara	Brewer	202 York St Brooklyn	11201
Leonra	Leaper	365 Clinton Av Bklyn, <sup>NY</sup> 11238	11238
Alvando	Leaper	365 Clinton Av Bklyn, NY	11238
Bobbie	GANT	508 Washington Ave, #32	11238
DOROTHEA	Thompson	210 Clair Ave	11205
Aptie	WOODS	662 Seefersom Ave,	11221
Christine	McPherson-Smith	270 Monroe Street Bklyn, NY	11216
MARCELLE	NOLLY	143 Macbucan St. Bklyn 11233	11233



District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Debra A. Powell	Powell	115-08 180 <sup>th</sup> St. Addison Park, NY	11434
William G. Foster	Foster	2110 1 <sup>st</sup> Ave, NYC, NY 10029	10029
<del>Joyce</del>	Dunnigan	1367 E. 56 <sup>th</sup> St. <del>NY</del>	11234
Mercedes	Smith	390 Nostrand Ave Apt 46	11216
Mae	Burnes	161 South Eleventh Place apt 108	11217
Gian	Dean	47 McKeever Place Apt 18B Bklyn 11225	11225
Barbara	Jordan	161 S. Elliott Pl Apt 4H Bklyn NY 11217	
Sheena	Salksen	945 Park Pl 7 B Bklyn, NY	11238
Lynthia	Bryant	945 Park Place #B Brooklyn	11213
Lisa	Willis	309 Lafare He Ave	11235
Gail	Stanback	77 Garfield Pl.	11215

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
SHAKIRA	SCARBOROUGH	129 FRANKLIN AVENUE, Apt. 4C	11205
Alfred	Morse	1060 Herkimer St.	11232
Muyra	Rope	277 Washburn Ave	11216
Krught		62 E 31st St B'klyn 11236	
Myreah	Doyl	85 Jamaica St 11231	
PAT	Grant	103 Clinton Ave Bklyn NY 11205 #10E	
Stacy O. Blank	Stieley A. Fland	200M Washington Ave Bklyn, N.Y. 11205 #10E	
Wesley	Dias Sr	295 Adelphi St, Bklyn, NY 11205	11205
Yvonne	Baynes	634 Marey Ave Brooklyn NY	11226
Ashana	Little	719 Beverly Rd	11218
Marilyn	Brown	21 St James Pl	11205

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Linda	Ajrpo	190 York St Apt 12-H	11202
Bobby	Stanbace	79 Garfield Pl NY	11215
Leatrice	Roberts	272 St. James Pl. NY	11238
Edina	Larson	80 Putnam Ave.	11238
Rashida	Geary	411 Grand Ave Brooklyn NY	11238
Lynette	Mc Cord	435 Hancock St Bklyn NY	11216
Sam	Young	185 Hall St "	11205
William	Simms	178 4th Ave East Orange NJ	07017
Kewen	Bunert	172-33 Ameliana Rd	11434
Yvonne	Kunst	172-33 Ameliana Rd	11434
Fred	Williams	19043 Ave C Long Beach CA	
Gene	Kelley	Kerry, NY 11449	

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Wendy	Brand-Merbaum	201 St. James Place, Bklyn, NY	11238
Charles	Frimson	33 South Court Pl. Bklyn, NY	11217
CAROL	CALLENBA	195 Ave Leffly, one apt 203 Bklyn, NY 11205	11205
CAROLYN	DUTKIN	540 Clinton Ave Bklyn NY	11238
Anita	Alsten	464 VanBuren Bklyn, NY	11221
ROBERT	SMITH	18 HART ST Bklyn, NY.	11206
Mette P	Wormuth	364 East 28 <sup>th</sup> St Bklyn, NY	11226
YVONNE	JOHNSON	1389 Pacific St	11216
Lisa	PINDERER	195 Willowby Ave #507 BK, NY	11205
Eliza,	BALKER	557 Schenck Ave.	11287
MARY	DAVIS	418 DEERUE ST	11233
Ame	DUBINER	293 Sterling Place, Bklyn, NY	11258

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Kydia	Diaz	97 Schless Street	11206
Haele	Spaul	2274 Monroe St. Brooklyn NY	11216
Raymond	Dancy	<del>286th St</del> Street Brooklyn	11202
Betha	Stokes	1440 Bedford Ave Bklyn	11216
Joella	Segure	285 Lincoln Pl Bklyn	11238
Giffany	Estrey	1440 Bedford Ave Bklyn	11216
Deborah	Youdey	185 Hall St. Apt. 915 Bklyn	11205
Caroy	BARNES, JR.	HOUSTON TEXAS	77063
Heather	Ingram	35 E. 136, Bklyn, NY 11238	11238
Clea	Palmer	165 E. 59th Street Brooklyn NY	11203
Jenny	Smith	77 Vandalaria Ave apt 3D 11239	11239

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Najee	George	290 Putnam Ave	11216
Masita	Johnson	521 St. Marks Ave	11216
NATHAN	LEWIS	360 NOSTRAND AVE	
Rhonda	Lungston Johnson	521 St Marks Ave.	11238
Sreen	Williams	1855 Lenox Avenue Ave	11238
Lorice	Williams	1855 Lenox Avenue Ave	11238
Daryl	Godwin	47 Henderson ST	11216
Robert	Johnson	104 Adelphi St # 323	11205
Jennifer	Toole	220 Manhattan Avenue	
Dana	Green	927 Decalb Ave, 15B	11221

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Yvesini	Thorbourne	201 St James Pl 1-F	11238
Vergenia	McRae	278 Carlton Ave	11205
Melvin	Barton	15 Saint James Pl	10038
JAYLE	Golson	266 Washington Ave #23	11205
Mildred	Daniel	116 Lenox Rd Brooklyn	11226
Lettie	White	103 Clevermont Ave	11205
MARU	MARNER	537 Clinton Ave 3F	11238
Jammar	Green	11514 Flatlands 10th St Brooklyn NY 11219	11336
Tamara	Sigler	10514 Flatlands 10th Street Brooklyn NY 11219	11236
Skylar	McClure	364 East 28th Street Brooklyn, NY	11226
MARY	Bullen	343 Withkops + Bklyn	11225
Doremy Dzier	Dzier	771 E 34th Street	11210
Carol	Harris	302 Sead Ave Bklyn	11224

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Dues	Smith	409 Clemont Ave	11238
William	West	409 Clemont Ave	11238
Robert	Smith	18 Hart St	11205
SADIE	SpuRill	10544 Flatlands 1 <sup>ST</sup> BR 11236	11236
VINCENT R. <del>M</del>	MOSES	823 Brooklyn Ave #28 Bklyn, NY	11203
Grace	Stevens	980 Spring St. Ste 101	11213
Janet	Fowler	484 Washington Ave Brooklyn NY	11238
Tongce	Jordan	484 Washington Ave P.O. Box 750713 Forest Hills, NY	11375
ELIZABETH	DEKATTA	260 Collier Dr	11238



District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Bernard	Amey	477 Powers St Bklyn	11205
Lillian	Wood	409 Clermont Bklyn	11238
Wallera	Hayes	960 Sterling Pl 6F 11213	11213
Barbara	White	472 Washington Ave Bklyn NY	11238
Vetter	Johnson	119-26 221st. Cambria Heights	11411
Rose	McGowan	258 Wyckoff St 46	11219
Debbie	Lucy	240 Gates Ave	11238
Nelson Denise	Hayes	940 Stollme Pl 1	11213
MARCINA JONES		240 Decatur St Brooklyn NY	11238

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Dena	Brown	310 Phrazer E	11238
John	Humphrey	489 Clinton Ave	11235
William	Middle St	10 Clinton St, Bklyn, NY 11201	3111201
William	Middle	10 Clinton St Bklyn, NY	
SHAH	Nashua	432 Nashua St Bklyn, NY	11235
Bobbie	Pettway	260 Cumberland	11205
Joseph	Cole	1030 Ocean Ave APT 6A	11226
Brenda	Dixon	1030 Ocean Ave APT 6A	11226
Tracey	Brown	311 Putnam Ave PH	11216
Yolanda	Reynolds	580 Stanley Av 7E, Bklyn	11207

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Y. Santala	S/veinice	31 Carmelite Ave Brooklyn New York 11238	11238
Andrew	Hubbard	174 Laguardia Ave Brooklyn NY 11238	
Amo M	LUSIAC	150 Hawthorne St. BKLYN, N.Y. 11235	
Magdaline Williams	→	591 E 48th Street Brooklyn, NY. 11220	
Flaine	FOX	270 Kosciusko St Brooklyn, NY 11221	
Alvin	Roberts	499 Washington Ave BKLY NY 11238	
Franklin	Broady Jr	716 Dean St. BKLYN, NY 11238	
John	Hatchers	888 Grand Old Dry BKLYN NY 10451	
Robert Richards	Richards	500 Washington Ave BKLYN NY 11238	
Mary Barton	Barton	202 York St BKLYN NY 11201	

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Koree	VANN	5817 Tilden Ave Bklyn	11203
Rosa	WitSELL	395 Clinton Ave Bklyn, NY	11238
Vicky	BRUSH	35 TRAY AVE, BR, NY <del>11213</del>	11213
Valerie	Becks	1670 EUSTON ST Apt 6L Bklyn, NY	11213
Shari	Merris	10 Lewis St #4T Bklyn,	11201
Renée	Nantz	700 Greene Ave # 3 Bklyn, NY	11221
Sumi	Gunn	PO Box 20863 Brooklyn, NY	11202
MAE	Bowers	451 Clinton Ave Bklyn, NY	11238
Barbara	MURDOCK	59 East 59th St Brooklyn <small>Address</small>	11203 <small>Zip</small>
Janetta	White	21 ST. James Pl. Apt. 5N	11205
Dora	Fisher	1002 East 82 Apt 3	11203

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Dorothy	Jones	1067 Hancock St Bklyn, NY	11221
Delores	Haskins	1121 Hancock St Bklyn, NY	11221
Ervin	Garrett	414 Sutter Ave 149 Bklyn, NY	11212
Caroline	Mathews	785 Lincoln Ave 15m Bklyn NY	11208
Dorothy	Williams	150 Ave Horne St Bklyn	11225
Nellie	Thornton	150 Audubon St Bklyn	11228
James	Burdick	183 Healey St Bklyn	11216
Rosalyn	Galbreath	1384 Pacific St DC	11216
Dehdra	Brown	130 LeFerts Place Cr	11238
Millicent	Pikson	487 Carlton Ave	11238
Rachone	Fishbe	1202 E 80 St Bklyn ny 11238	11238

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Pamela Dittman	Williams	191 W. 110 St NY 10026 #	11201
Debra Jones	Jones	597 Hooley St Bklyn, NY	11233
Averyl	George	79 Clinton Pl, 2d Bklyn	11238
Suzey	Shukla	311 East 23rd St N.Y. C	10010
Deborah	Clearest	195 W 117th St Bklyn	11205
Michael	Benbow	122A Marcus Garvey Blvd Bklyn NY 11206	
Marguerite C.	Suweis	345 Clinton Ave Apt 7F Brooklyn N.Y. 11238	11238
Dana	Burnett	333 Georgia Ave W Bklyn N.Y. 11207	11207
Nelissa	Cerys	36 Market Apt 5, nyc ny	10002
FRANKIE	LANTIGVA	427 5th AVE. BRUN, NY	11215
Rosmar W	Henning	14 Meadows Park NY	11754

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Catherine Williams	Williams	195 Willowby Ave #1618	11205
Mary	Applying	185 Hall St	11205
Penelope	Phillips	1649 Union St. - 4F. Bklyn	11213
Myler	Parrish	476 Clinton Ave #3F Bklyn	11238
Barbara	Baylar	533 Clinton Ave #3F	11238
Todd	Morgan	75 Hawthorne St Apt 4J	11205
Louis	Chappell	484 Livingston Ave	11238
Judith	Williams	635 Duane St Apt 609	11221
Ramona	Bamble	625 Duane St apt 513 Bklyn NY	11221

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Tim	Bobbe	333 Jefferson Ave Bklyn	11216
Mark	Bobb	5 Puerdegat 11th St Bklyn	11236

District lines must respect communities of common interests!

First Name	Last Name	Address	Zip
Helba Adams	Adams	117 Gates Ave Brooklyn, NY	11238
<del>Quanita</del> Ross	Ross	170 New York Ave Brooklyn NY	11216
Deborah	Young	986 Sterling Place Bklyn NY	11213
Shantai	Jelveron	8910 1 Oand road, Oand Park, Oand	11416
Berkly	Jacobs	185 Clinton Ave Apt 4D Bklyn NY	11205
Whiston	Spare	297 Vanderbilt Ave	11225
Gabrielle	Glashan	205 St James Pl Apt 4L	11238
MARGOT	BERGHOUT	151 ST. MARKS AVE Bklyn	11238
Doreen	Winfield	1720 Bedford Ave, #19b Bklyn, NY	11225



Date: March 2, 2012  
From: Citizens Alliance for Progress, Eduardo Giraldo  
Queens Universal Lions Club, Maria Guillen  
Hispanic Chamber of Commerce of Queens, Patricia Mahecha  
To: Special Master Roanne Mann  
All interested parties

As district lines establishing Congressional districts in New York State for the next ten years are drawn, it is crucial that the interests of all New Yorkers, including minority communities in Queens are adequately addressed.

To date, maps presented publically and to the courts do not do that.

On behalf of the Citizens Alliance for Progress, Queens Universal Lions Club, and the Hispanic Chamber of Commerce of Queens, we are submitting maps that connect communities in Corona and Jackson Heights, Queens with communities of common interest in the West Bronx and Northern Manhattan.

These communities are predominantly Spanish-speaking, share businesses, civic and cultural institutions, ethnic media, and important resources.

We propose that these communities be connected and unified in one Congressional district, in accordance with good-government and fair redistricting principles.

MEMORANDUM IN SUPPORT OF THE COMMON CAUSE  
REDISTRICTING MAPS FOR NEW YORK STATE CONGRESSIONAL DISTRICTS

New York State Parties Propose Redistricting Maps  
Unconscionably Adverse to Interests of Insuring Fair Representation for Citizens

The redistricting maps of the New York State legislators are inherently partisan without regard to the citizens' rights to determine fair and logical representation resulting from a cohesive district constructed on the foundation of fair geographical boundaries. In review of the drawn lines, it is obvious that they were determined by perpetuating incumbent political interests. There is no alternative redeeming value to the lines drawn and therefore they must be dismissed as viable alternatives.

Where the State Has Failed to Submit a Viable Redistricting Plan and the State Legislators Are  
At Odds Over District Lines, the Courts Have an Obligation to Select an Alternative Where a  
Viable One Has Been Proffered

It is a rare instance where the Courts should intervene in the determination of district lines for a State's Congressional Districts and substitute its judgment. However, the Legislators of the State have ceded their rights to make the decision where they have failed to come to a reasonable and just conclusion to the point of absurdum. It is a failure of the highest magnitude in executing their obligations to the citizens of the state. The citizens' rights here trump the initial obligation of the State legislators and the Courts have the right and obligation to select a citizen based alternative proposal.

Conclusion

Based on the failure of the State to submit a map redistricting the Congressional lines and on the inability of the State Legislators to propose any semblance of an equitable and fair redistricting of lines other than those based on perpetuating the interest of incumbents, which is directly adverse to the propagation of the democracy inherent in the Constitution of the State of New York, the court should select a citizen based proposal that is embodied in the Common Cause submission on redistricting of Congressional Districts.

Respectfully submitted,

Stephen H. Kimatian, Esq.  
City of Syracuse Republican Party Chairman

Dated: March 2, 2012  
Syracuse NY



I urge the court to reject the proposed Congressional redistricting plans put forward by both the New York State Assembly and the State Senate.

Both legislative bodies have failed to agree on reapportionment in a timely manner. New York's redistricting has become an overly political process. It is my understanding that incumbent Congressman have been employing lobbyists and neither party seems to be working towards the common good.

These proposed districts were not drawn based on compactness, geography, or commonality of interests, but for purely partisan reasons. This is especially true with respect to the 25<sup>th</sup> Congressional District that I currently reside in. These proposed lines were produced with the sole intention of determining a winner of the election before the race has even begun.

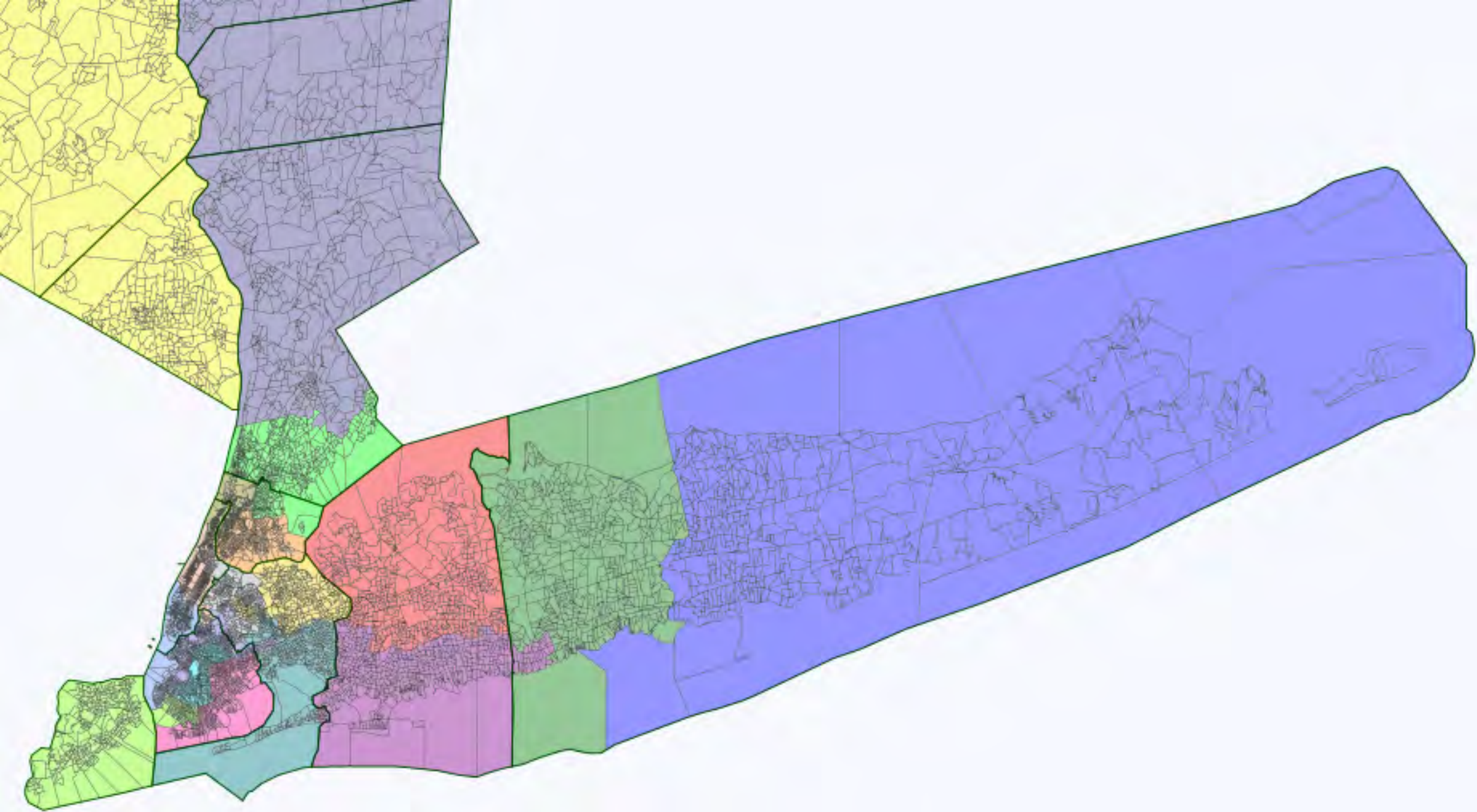
In the political process of redistricting, Assembly and Senate members are not representing the best interests of the citizens. Rather, they appear to be attempting to represent their own best interests.

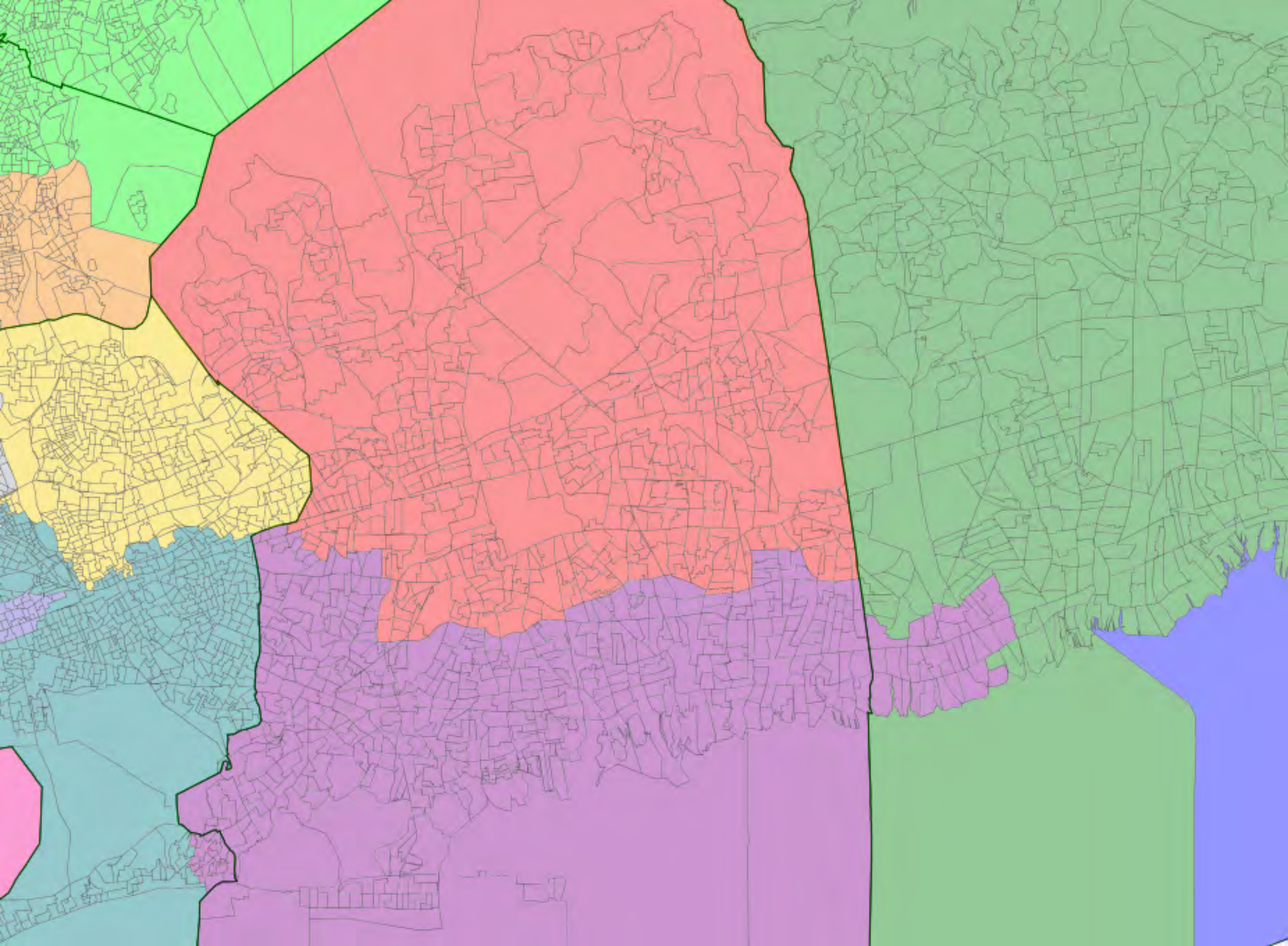
The redistricting plans submitted to this court by non-partisan organizations and citizens are uniformly more compact, reasonable and, frankly, set up more competitive seats in Congress, which is surely in the best interests of the people of New York and the United States. The House of Representatives is supposed to reflect the will of the people because Congressmen are required to face re-election every two years. Drawing totally safe Democrat and Republican Congressional districts has the effect of making the House a rest home for career politicians who never face a competitive election.

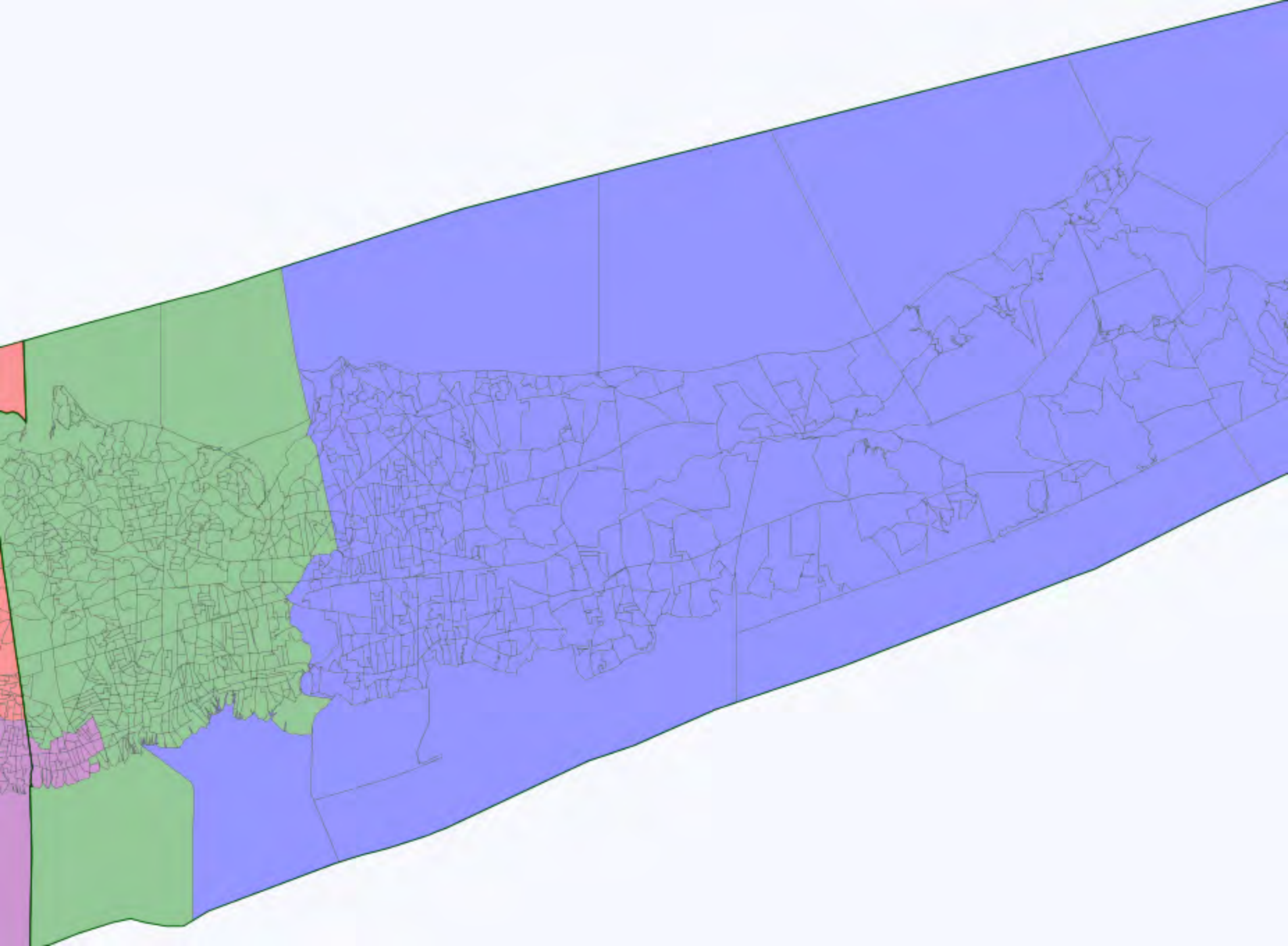
I ask this court to turn down the Assembly and Senate redistricting plans in favor of a more common sense approach.

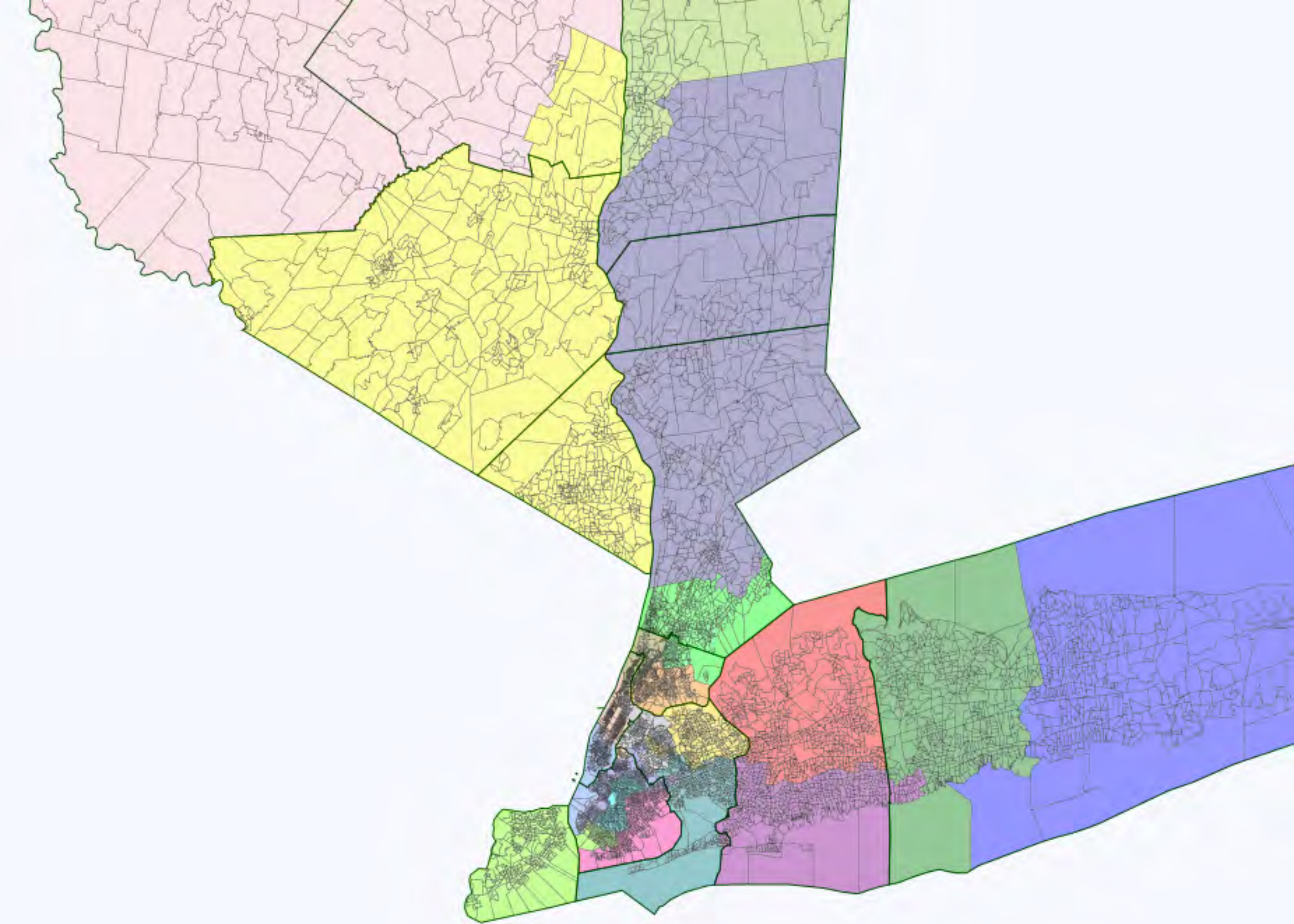
Sincerely,

Mary Beth Clare  
104 Northwood Way  
Camillus, New York 13031

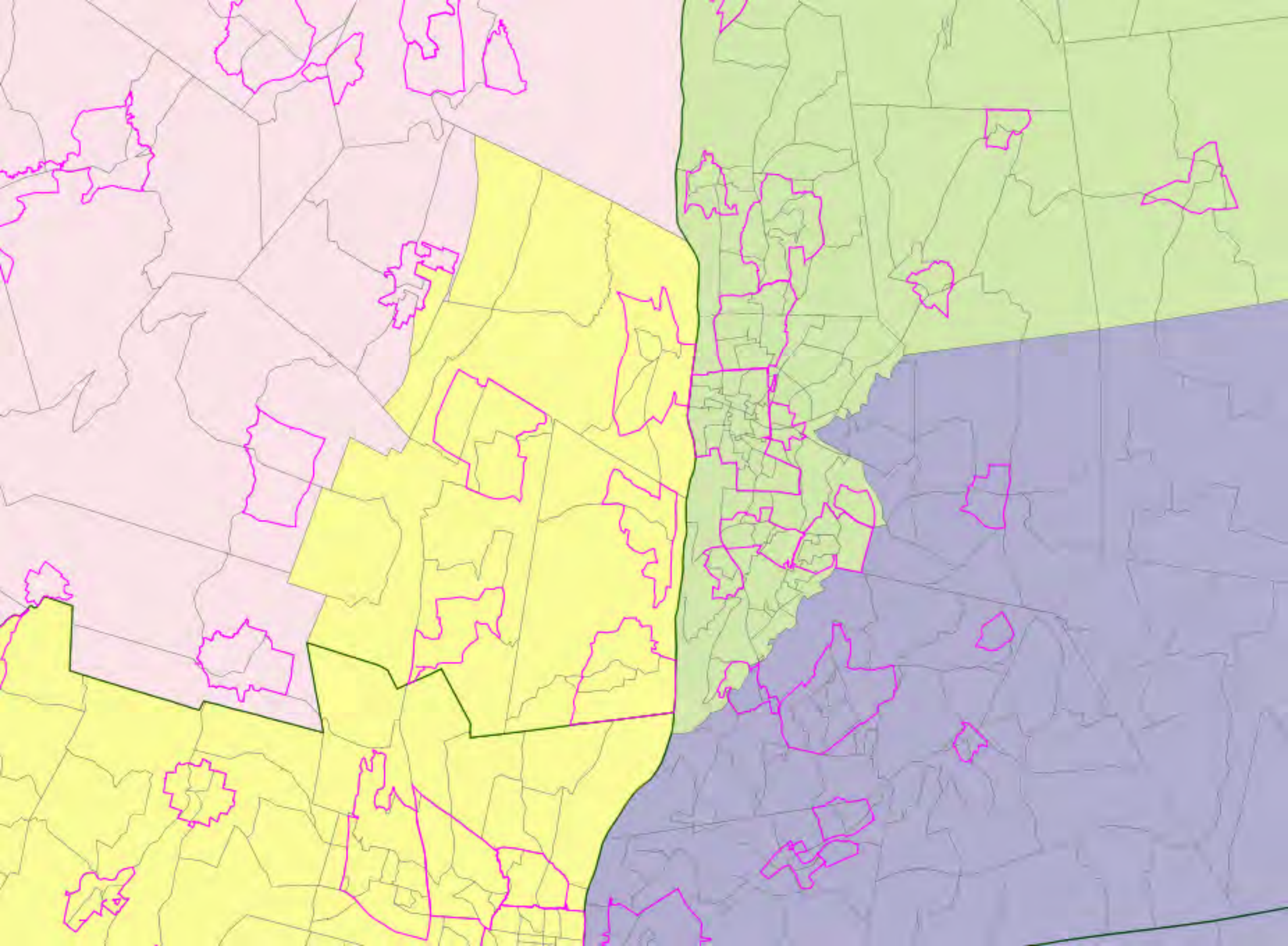


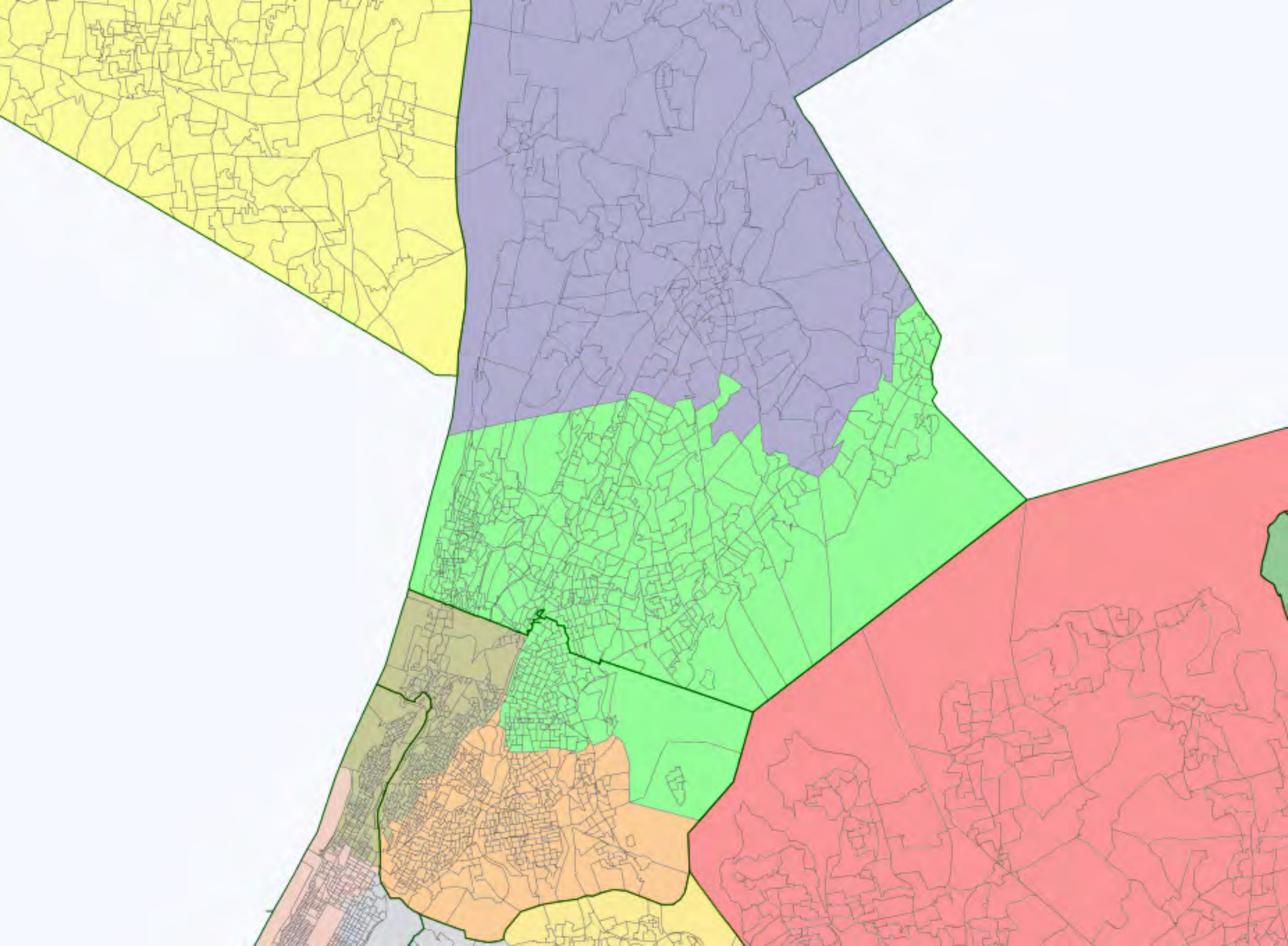












## **RATIONALE FOR REP. YVETTE D. CLARKE PROPOSED NY 11<sup>TH</sup> CONGRESSIONAL DISTRICT**

by: Latrice Monique Walker, Esq.  
[latricemwalkerresq@gmail.com](mailto:latricemwalkerresq@gmail.com)

Rep. Yvette D. Clarke is a Member of Congress representing the 11<sup>th</sup> Congressional District. As the youngest African-American woman to serve in the 112<sup>th</sup> Congress and the only African-American woman from New York, Rep. Clarke is writing the pages of American history, following in the footsteps of the late Honorable Shirley Chisholm. Rep. Clarke, who now represents the same district she once served, has taken the lead on many of the issues that plagued this district then and still exists today. With a growing immigrant population and as a Caribbean-American woman herself with a lineage in Jamaica, Rep. Clarke has brought a voice to a people who have been underserved, underrepresented, and deserve equal opportunity and access to their government.

It is the express desire of Rep. Clarke to ensure that the redistricting process results in a congressional district that respects the communities of interest of the Black Voting Age Population of Kings County neighborhoods, including but not limited to: Canarsie, Flatlands, Remsen-Village-Rugby, Flatbush, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights, as well as continuing to preserve the interests of other communities including: Prospect Heights, Gowanus, Park Slope, Carroll Gardens, Windsor Terrace, Kensington, Ocean Parkway, Midwood, Borough Park, and Prospect-Lefferts Gardens.

Rep. Clarke is committed to defending the voting rights and political representation of the Black Voting Age Population, including the Caribbean community. Keeping communities together will ensure that these communities will have a full and fair opportunity to elect candidates of their choice in accordance with the Voting Rights Act of 1965, 42 U.S.C. § 1973.

### **THE PROPOSED DISTRICT ADHERES TO CONSTITUTIONAL AND VOTING RIGHTS ACT GUIDELINES FOR REDISTRICTING**

The proposed 11<sup>th</sup> Congressional District (“the proposed district”), as submitted by Rep. Yvette D. Clarke, adheres to all Constitutional and Voting Rights Act redistricting guidelines. In drafting the attached map, the following criteria were adhered to: equal population; protecting communities of interest that reside within the proposed district; respecting political subdivisions; compactness and contiguity; and preserving the core of the prior district, which is a Section 5 covered voting rights district. See *Flateau v. Anderson*, 537 F.Supp. 257, 261 (S.D.N.Y. 1982); see also *Rodriguez v. Pataki*, 308 F. Supp. 2d 346 (S.D.N.Y. 2004).

### **PRESERVING THE CORE OF THE PRIOR DISTRICT**

The “maintenance of the cores of existing districts” is a required criterion for the enactment of new redistricting plans. See, *Puerto Rican Legal Defense and Educ. Fund, Inc. v. Gantt*, 796 F. Supp. 681, 687 (E.D.N.Y.1992); see also, e.g., *Karcher v. Daggett*, 762 U.S. 725 (1983); *Rodriguez*, 308 F. Supp. 2d at 352. By preserving the core of existing districts and

respecting the historical placement of district lines, courts not only show respect for past district lines but also preserve existing relationships between constituents and the elected officials to avoid voter confusion about which district they live in. The proposed district substantially maintains the same geographic and demographic configuration as the current district, with the exception of its expansion in size by approximately 85,219 persons, changing slightly to achieve population equality with the other districts in New York State.

The present district is a majority-minority district where racial and language minorities form a majority (at least 50% or more). According to (PL 94-171), the proposed district is comprised of a total voting age population of 55% Black, 28% White, 12% Hispanic, and 5% Asian. Thus, the proposed district would remain a majority-minority district.

### **COMPACTNESS AND CONTIGUITY**

According to the United States Census Bureau, the current district is the third most compact district in the nation. The total land area of the current district is 12.05 miles. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. An example of the overlay of the proposed district and the present district is attached for your reference. The most significant area of change is the southwest border. See, <http://2010.census.gov/2010census/data/>.

In 2002, the 11<sup>th</sup> Congressional District consisted of 654,361 persons. According to the 2010 Census, the 11<sup>th</sup> Congressional District presently has 632,488 persons, a loss of approximately 22,000 people. Thus in order to meet the 2010 Census population requirement of 717,707, the proposed 11<sup>th</sup> Congressional District must extend into South Central Brooklyn by 85,219 people.

Historically, the concentration of minorities within Central Brooklyn has allowed for the formation of compact and contiguous districts. Recent population shifts in the demographics of Central Brooklyn, however have caused the borders of the proposed district to be delineated to ensure the maintenance of a majority-minority district and to avoid vote dilution. Data from the 2010 Census supports the fact that a population shift has occurred from North-Central Brooklyn to South-Central Brooklyn.

### **SECTION 2**

In accordance with the directive of the United States Supreme Court in *League of Latin American Citizens v. Perry*, 548 U.S. 399, 433 (2006), under Section 2 of the Voting Rights Act, voting districts should include minority populations with a “community of interest.” Furthermore, the Court in *Reynolds v. Sims*, 377 U.S. 533, 566 (1964), provided that “the equal protection clause of the fourteenth amendment guarantees the opportunity for equal participation by all voters, and redistricting plans that do not achieve fair and effective representation for all

citizens impair the basic and fundamental rights secured by this amendment.” *Puerto Rican Legal Defense and Educ. Fund, Inc. v. Gantt*, 796 F. Supp. 681, 687 (E.D.N.Y.1992).

### **COMMUNITIES OF INTEREST**

The proposed 11<sup>th</sup> Congressional district was developed based on a review of census data and materials, consulting with social scientists, statisticians and other professionals who possess personal knowledge of the Caribbean community in Kings County, and work with community-based organizations and community leaders.

The proposed district further unites the common interests of the largely Caribbean, South American, African, Asian, Pakistani, Bangladeshi, Latino, and African-American ethnic communities. The proposed district is defined by shared interests, such as social, economic, cultural, linguistic, and other factors that indicate communities of interest. Some common links between these groups include the following: shared educational system; shared shopping/business corridors; shared community parks and recreational centers; common utilization of modes of public transportation.

According to the 2005-2009 American Community Survey, the present district is comprised of 56% females over the age of 18. A few issues specific to women are: reproductive freedom, SNAP, WIC and Child Health Care. Thirty-nine percent of the people living in the 11<sup>th</sup> Congressional District are foreign born; 30% of the population primarily speaks a language other than English; and 25% percent of the population (totaling 167,518 people) claim Caribbean ancestry. Caribbean-Americans are the fastest growing racial minority group in Brooklyn, New York. For this group, immigration issues are paramount. Likewise, 31% of the constituent base is employed in either the educational services, health care and social assistance industries; their workforce and labor related issues are a unifying quality. Brooklyn, New York has the largest Caribbean American population of any municipality in the nation. These findings should be deferred to in making redistricting decisions about which areas to include within congressional districts, since such districts typically encompass multiple neighborhoods. Constituents in southwest Brooklyn are also politically interrelated with their Caribbean-American counterparts in Brooklyn, New York. It is well settled that in redistricting, “manipulation of district lines can dilute the voting strength of politically cohesive minority group members”. This may be accomplished by “cracking a district whereas minority voters may be fragmented among several districts where a bloc-voting majority can outvote them, “or by “packing” them into one or a small number of districts to minimize their influence in adjacent districts. See, *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994).

As Caribbean-Americans and other Black residents in Brooklyn become more established, they migrate eastward towards Canarsie, Flatlands, Remsen-Village-Rugby, and East Flatbush moving along Rockaway Avenue and Flatlands Avenue. The Caribbean-American and Black Community has settled along these roads and maintain a local link to Rockaway

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Residents have similar needs, including: language access; difficulty applying for and receiving benefits or government assistance that they are entitled to; priority on education for their children; naturalization and immigration issues; and at local legislative levels, share elected officials.

Each neighborhood should be kept as a whole and all should be kept in the same congressional district.

#### **SECTION 5**

The proposed district is covered by Section 5 of the Voting Rights Act, which provides that any “qualification, prerequisite standard, practice, or procedure neither has the purpose nor the effect of denying or abridging the right to vote on account of race, or color, or [membership in a language minority group].” 42. U.S.C. 1973. In this regard, the proposed district does not have the purpose nor will it have the effect of denying or abridging the right to vote on the account of race or color. Any changes, including, the enactment of a new redistricting map constitutes a change subject to Section 5 review. See, e.g. *Georgia v. Ashcroft*, 539 U.S. 461, 471 (2003); *Beer v. United States*, 425 U.S. 130, 133 (1976). Kings County (Brooklyn) is covered by Section 5. See *Flateau v. Anderson*, 537 F. Supp. 257, 261 (S.D.N.Y. 1982); see also *Rodriguez v. Pataki*, 308 F. Supp. 2d 346 (S.D.N.Y. 2004)

Redistricting plans cannot include changes “that would lead to a retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise.” *Beer*, 425 U.S. at 141. In order to determine whether or not a plan is retrogressive, the Court must conduct an “examination of all relevant circumstances.” *Georgia*, 539 U.S. at 479-80 (quoting *De Grandy*, 512 U.S. at 1021-21); *PRLDEF*, 796 F. Supp. at 694-95. The present map was not adopted with a discriminatory intent, nor does it have a discriminatory effect. The proposed district is not nor does it intend to dilute racial and language minority votes; in fact, its express purpose is inclusion. Nor will the change lead to racially discriminatory retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise. Although New York State will be losing two congressional districts, coupled with the fact that

there has been a demographic shift of Brooklyn populations, the proposed map depicts an alternative solution to the 11<sup>th</sup> Congressional District that maximizes the number of Black Voting Age Population.

#### **CONCLUSION**

I urge that you give your most utmost consideration to this proposed map for the 11<sup>th</sup> Congressional District of New York, as introduced by Rep. Yvette D. Clarke.

In regard to: *Favors, et al. v. Cuomo, et al.*, 11-cv-5632(DLI)(RR)(GEL)

I submit the attached PDF and CSV files detailing one possible approach to Congressional redistricting for the State of New York.

I used as my guidelines the outline proposed by (now) Senator Mike Gianaris in the redistricting bill he proposed several years ago while a member of the State Assembly.

My intent was to draw compact, contiguous districts that respected existing County, City and Town borders to the highest degree possible. The exception to this rule was in New York City where attempts to maximize minority districts overrode respect for borough borders as well as compactness where necessary. Even there I did my best to minimize wandering districts with the exception of district 8 which wanders a great deal in order to draw together predominantly Hispanic-American neighborhoods. Likewise district 5 has one wandering section in order to draw in Asian-American neighborhoods.

Similarly I tried to keep communities of interest together though this was a lesser criteria and was also subject to my limited knowledge of such communities in certain parts of the state. I very specifically did not take into account current Representatives and incumbency. By primarily concentrating on geographic rules for drawing lines I tried my best to limit impact of knowledge of political constituencies.

I think it is disingenuous however on the part of those that deny any interest in partisan impact. The evidence is clear to see in the obviously gerrymandered lines submitted by most of the parties to this case. As such I will state that as a Democrat I am a little disappointed in the lines I drew because they do not present districts as strong as I could draw if drawing for partisan purposes. As a private citizen that believes our country and state is best served by representatives that are ultimately answerable to the people they represent through the electoral process (one of the primary arguments of those of us in favor of an independent, non-partisan redistricting process that creates compact, contiguous districts) I am quite pleased with the outcome of these lines as they create several districts that will be potentially competitive every election year. Districts 1-4, 17-19, and 21-23 all fall in this category while a few others will almost always belong to one party or the other but could still switch parties when voter outrage demands it.

District 5 presents the closest I could come to an Asian-American majority district. It consists of an Asian-American plurality of about 42.8% voting age population.

Districts 6, 9 and 10 are majority or plurality African-American districts with voting age populations of 42.5%, 50.1% and 49.4% respectively.

Districts 7, 8, 14 and 15 are majority or plurality Hispanic-American districts with voting age populations of 42.4%, 43.8%, 57.7% and 56.3% respectively.



This represents an accurate increase in Hispanic-American districts and decrease in African-American districts as well as the first Asian-American plurality district in state history which also accurately reflects the population of that part of the state.

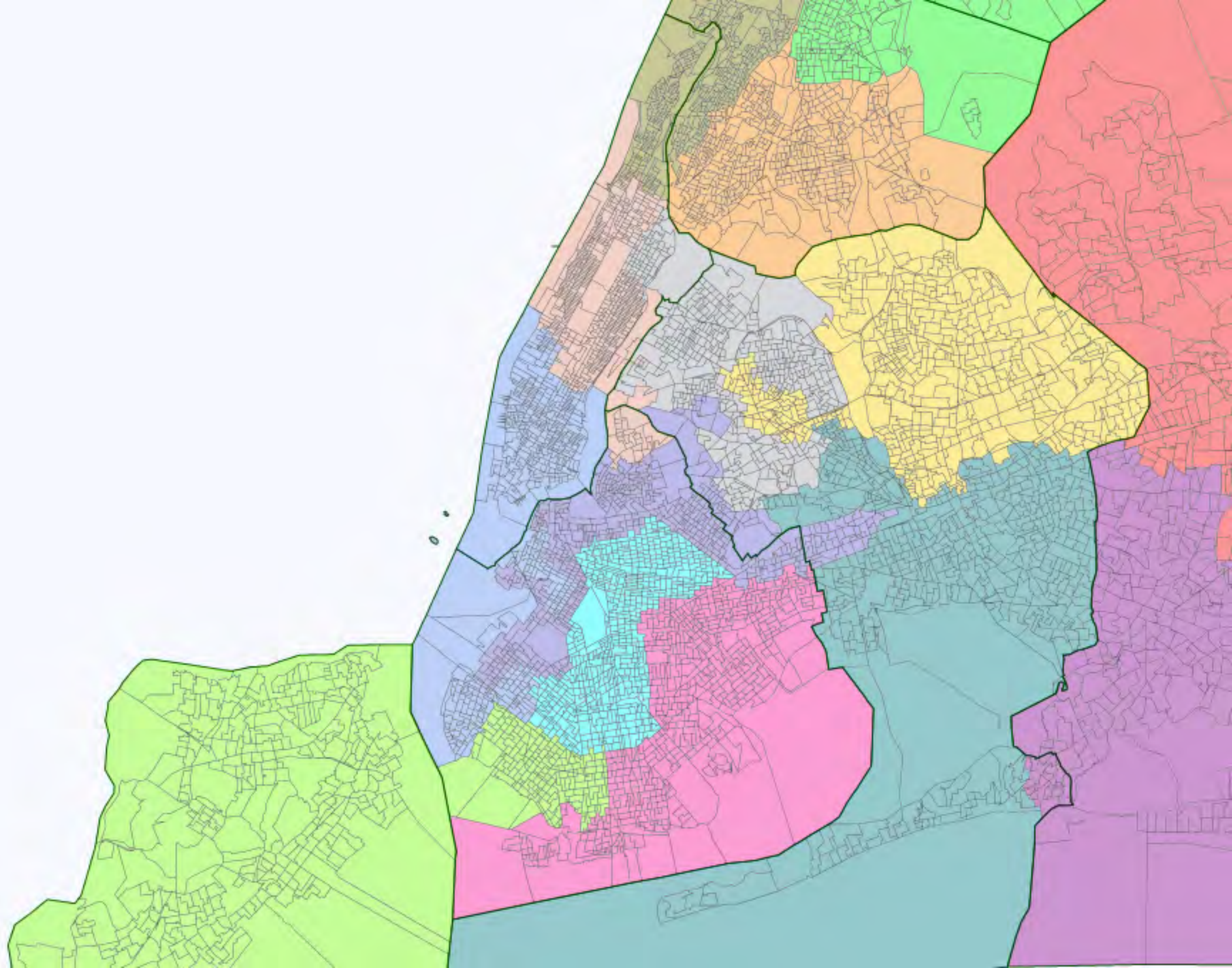
It is my hope that the court will similarly decide to follow the guidelines set out by Senator Gianaris bill or similar guidelines that maximize respect for the integrity of existing lower level (town, city and county) borders, where necessary breaks up larger entities before smaller ones, ignores partisanship and incumbency and attempts to maximize the impact of minority communities.

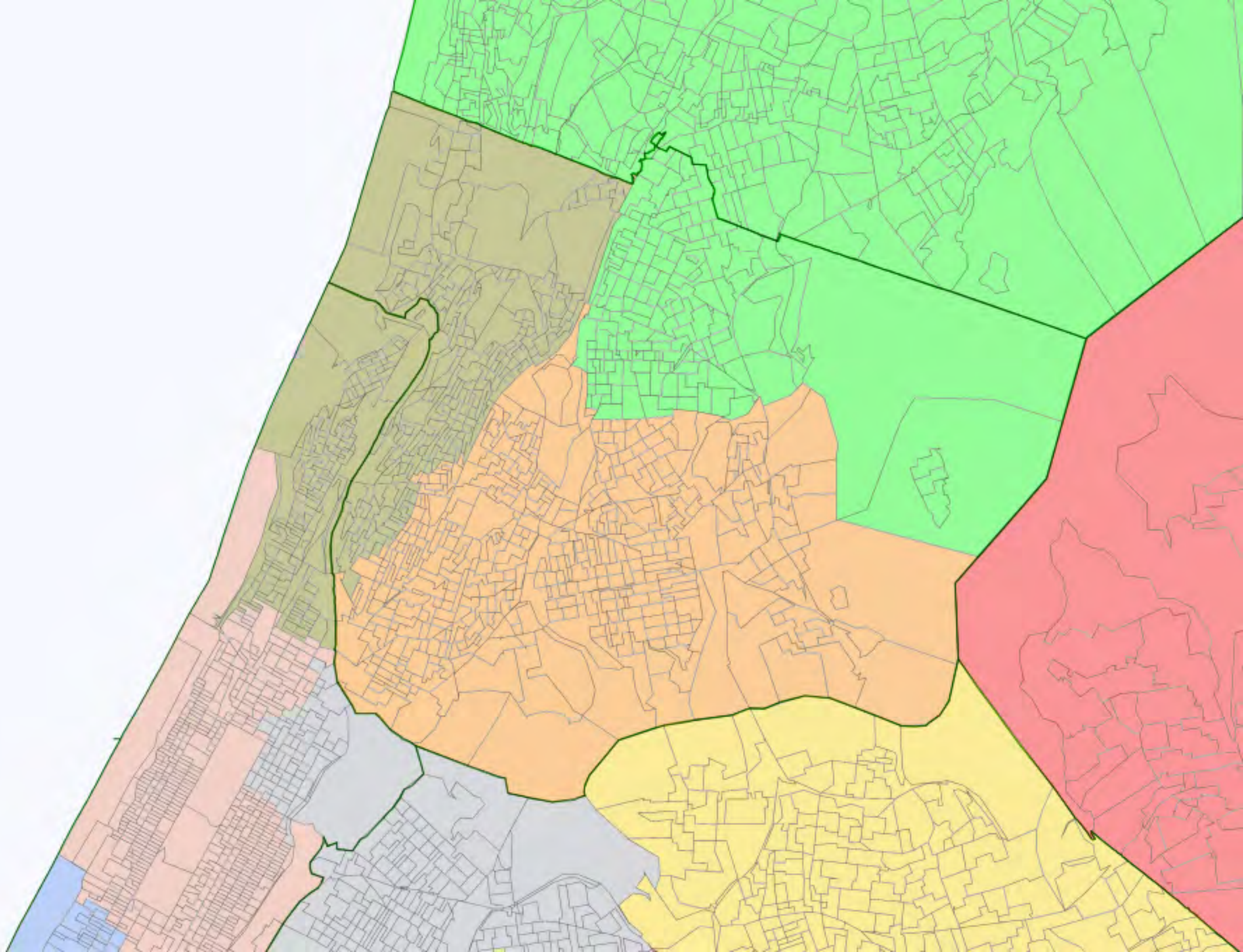
I know that one possible approach for the court would be one of "least change" in which the current district lines are used as a starting point and alterations are kept to a minimum in order to minimize the impact of the court. I submit that with the loss of 2 districts minimal change will be difficult to accomplish but more importantly that the existing lines were highly gerrymandered and inherently unfair and non-representative of the people of New York State. Consequently I ask that the court not take existing district lines into account.

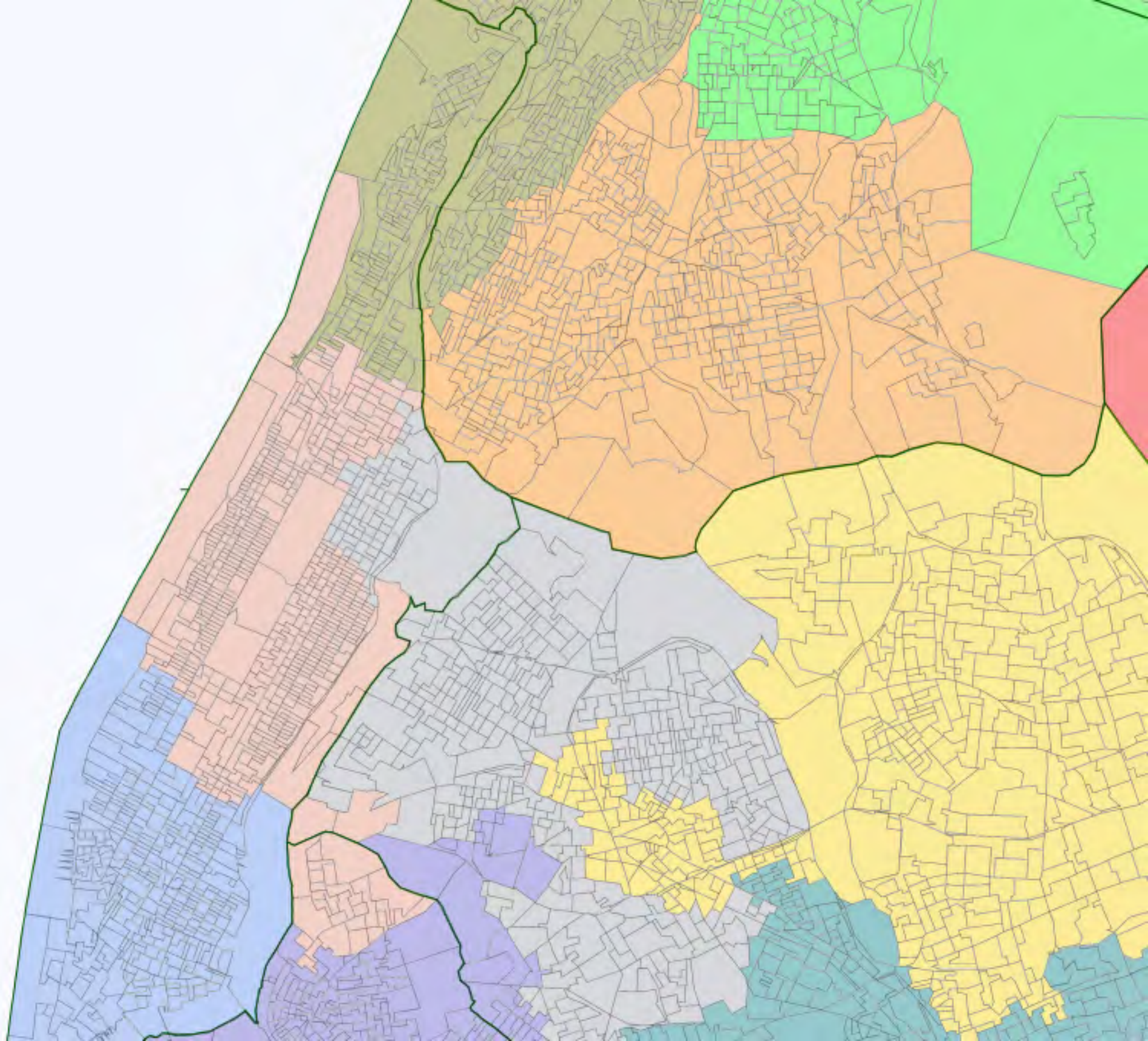
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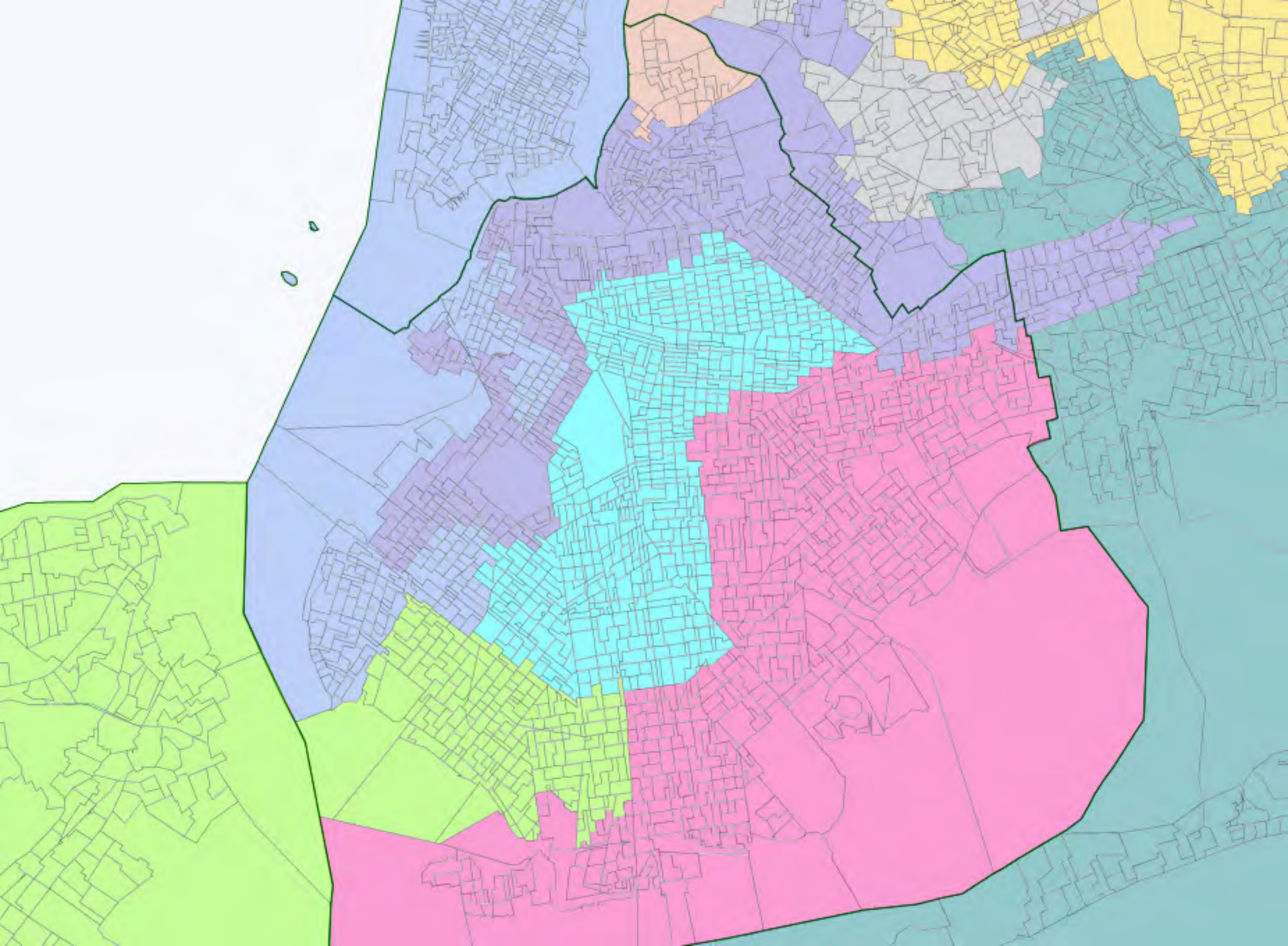
Andrew C. White  
Stephentown Democratic Committee Chair  
PO Box 335  
Stephentown, NY 12168

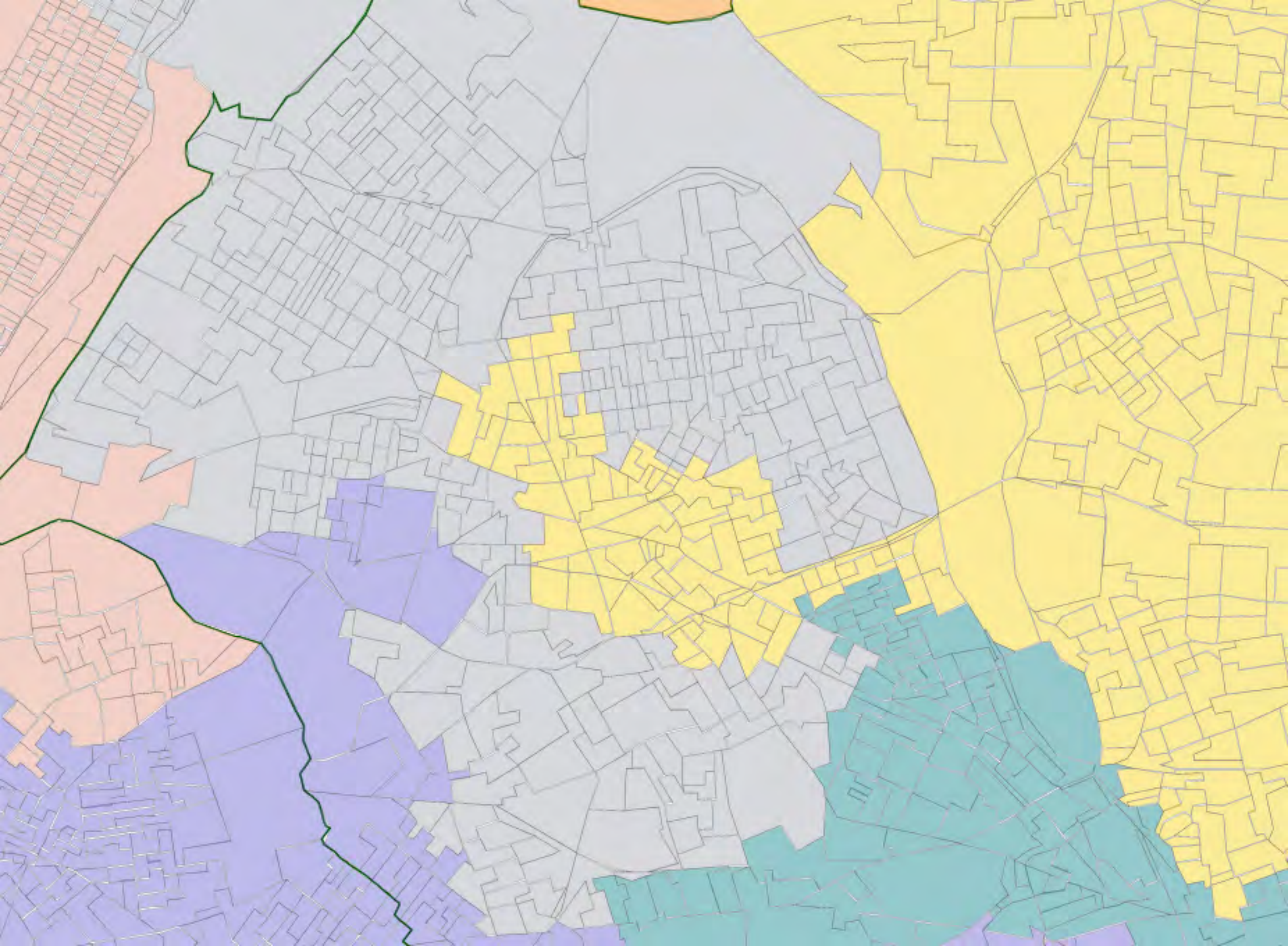
March 2, 2012

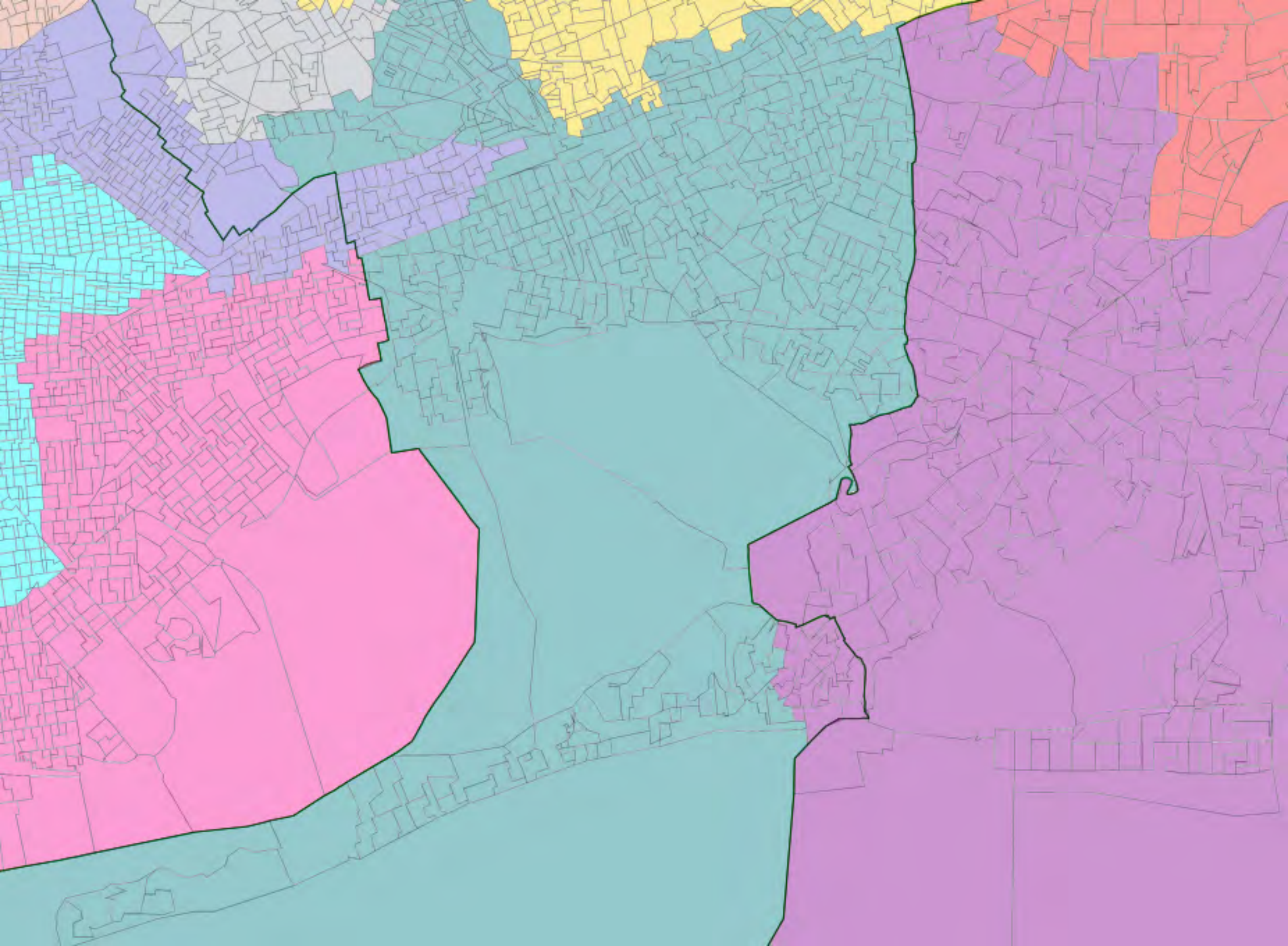












## **RATIONALE FOR REP. YVETTE D. CLARKE PROPOSED NY 11<sup>TH</sup> CONGRESSIONAL DISTRICT**

by: Latrice Monique Walker, Esq.  
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### **SECTION 2**

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#### **SECTION 5**

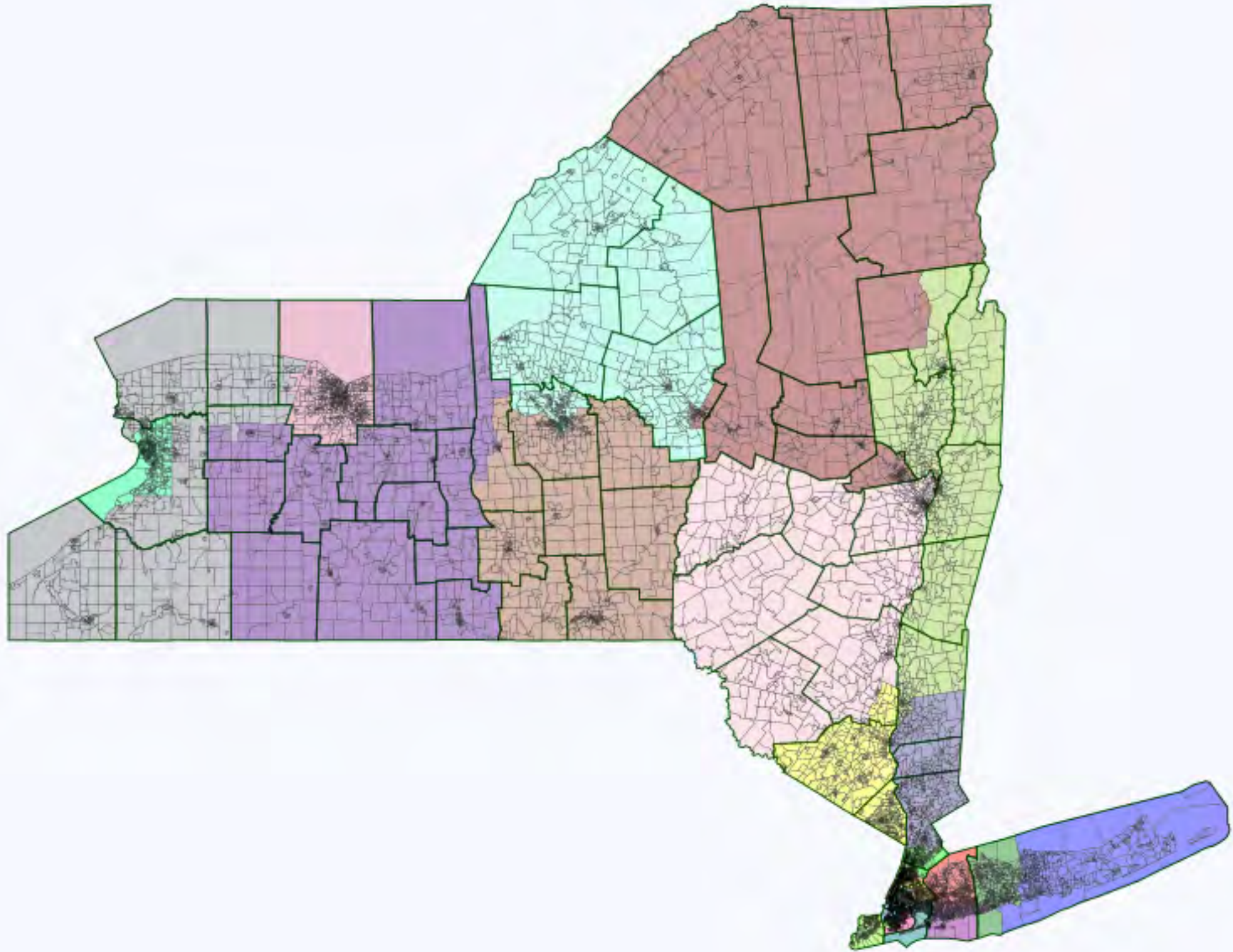
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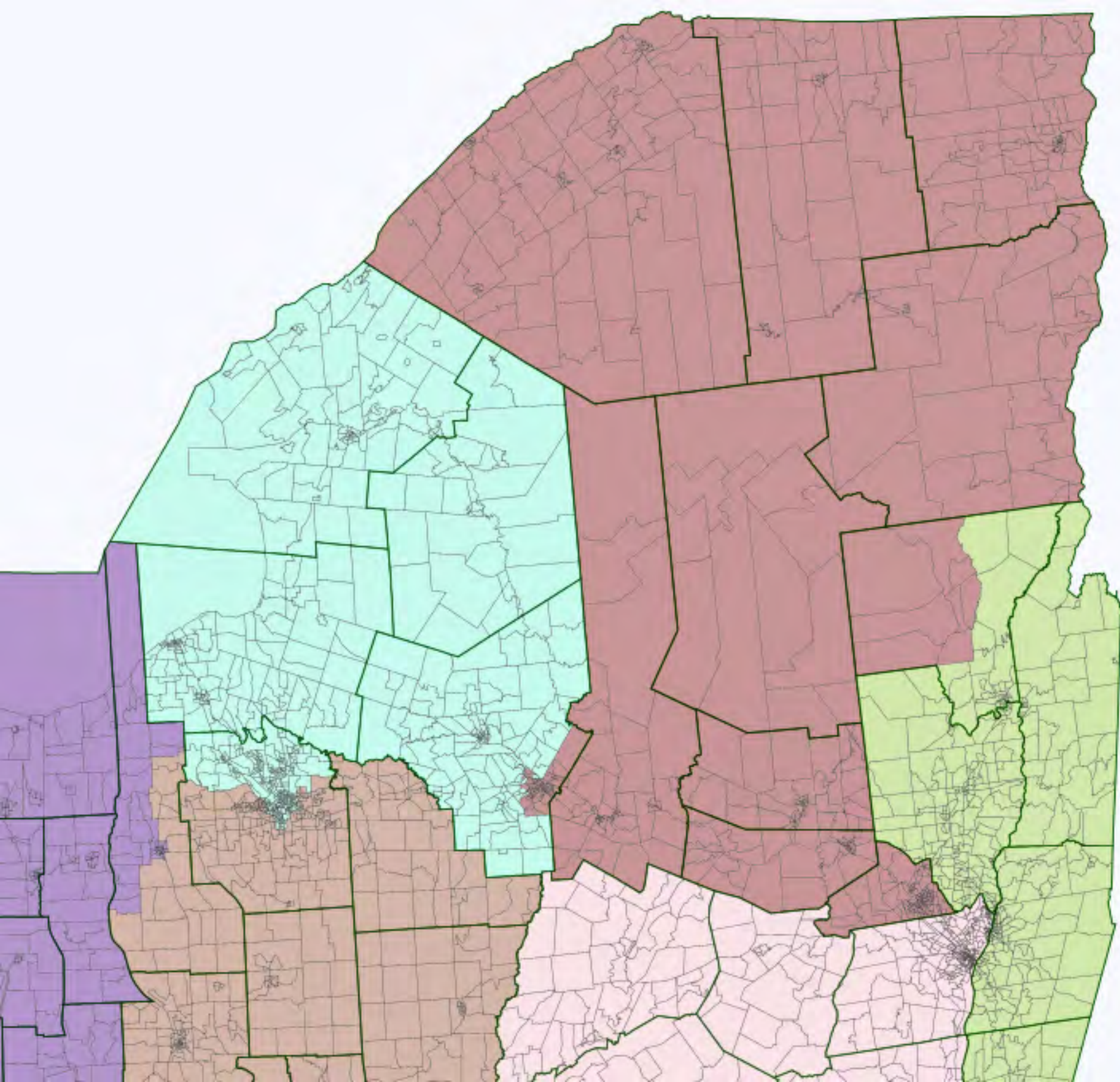
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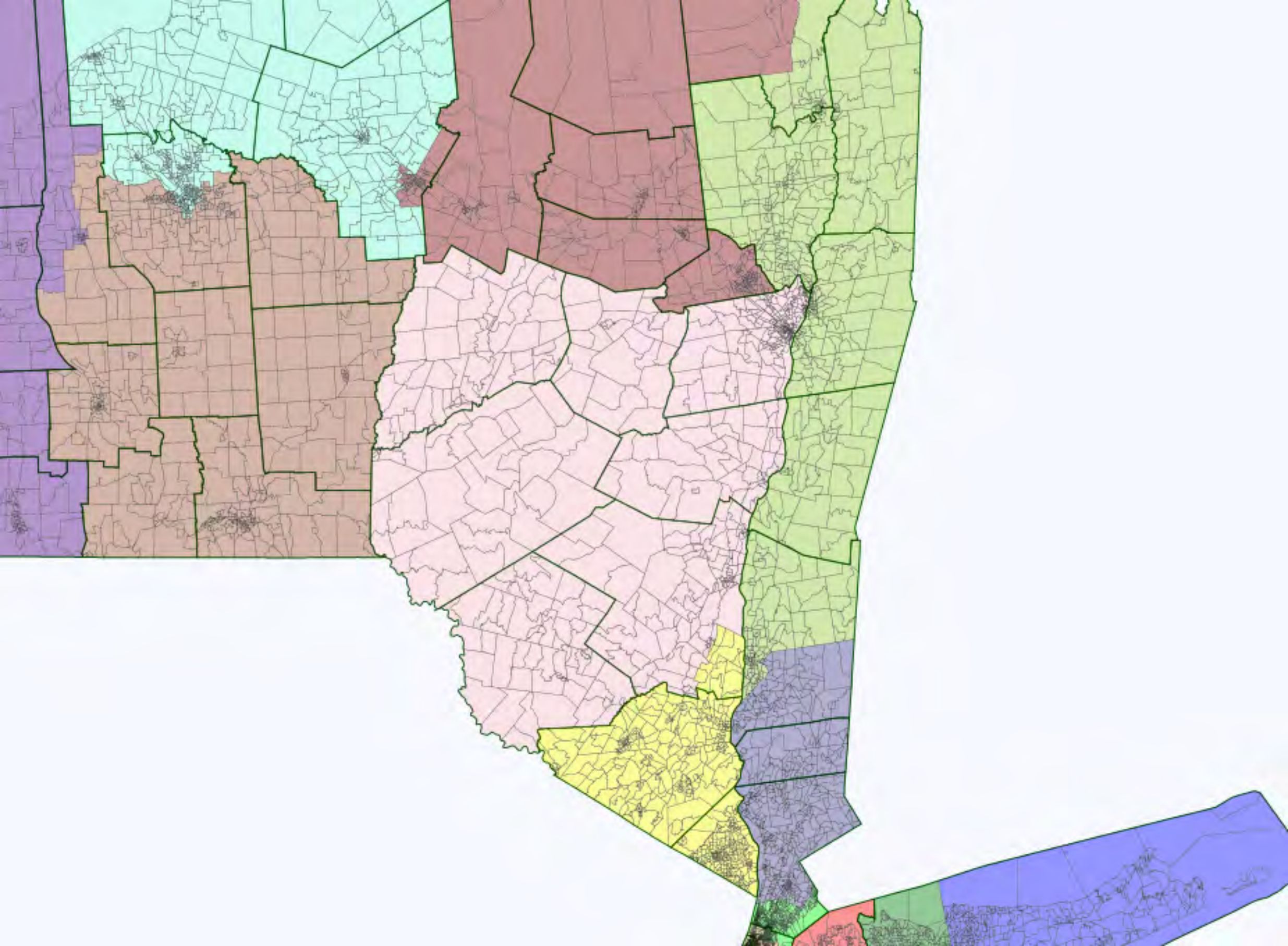
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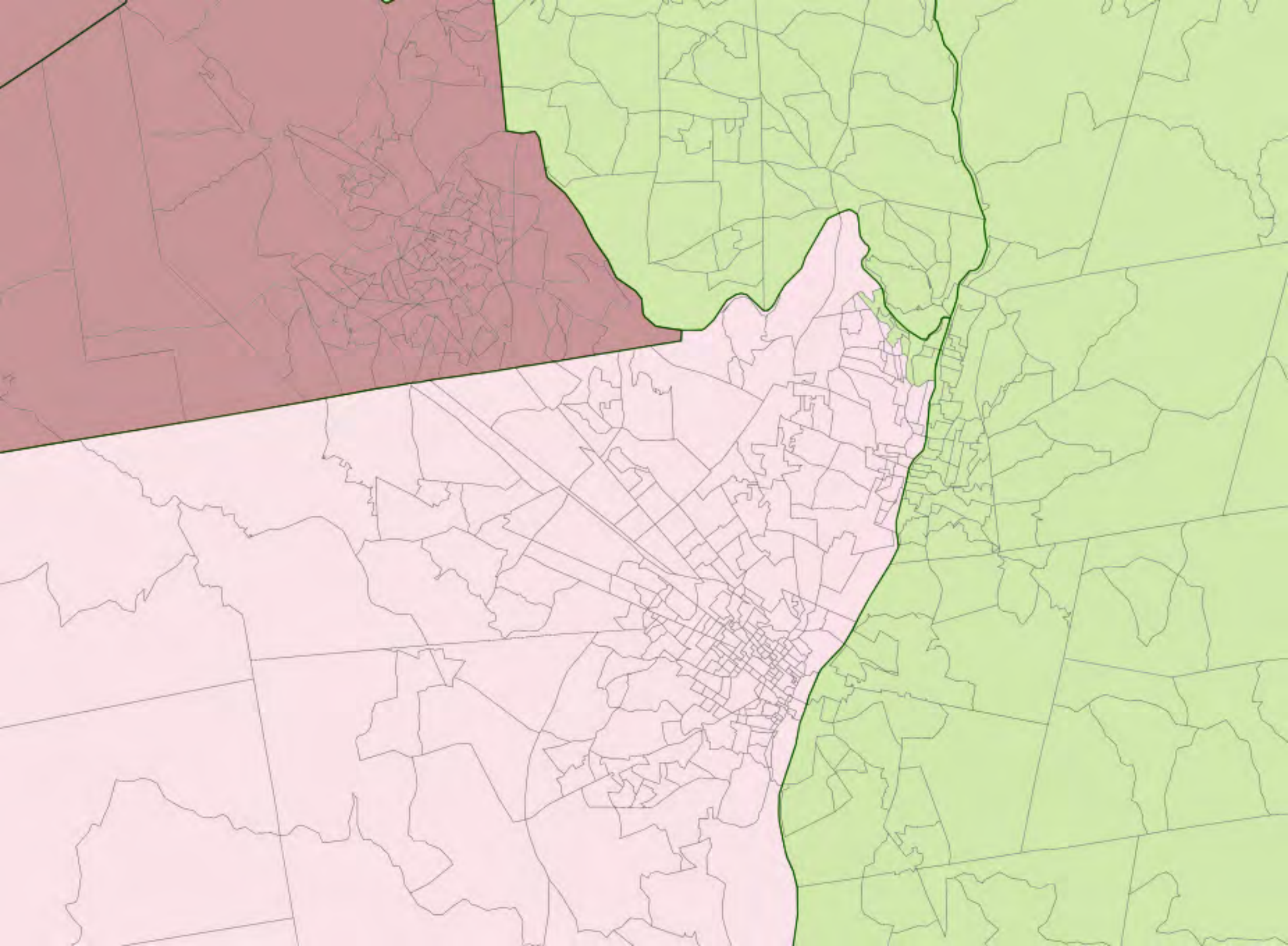
#### **CONCLUSION**

I urge that you give your most utmost consideration to this proposed map for the 11<sup>th</sup> Congressional District of New York, as introduced by Rep. Yvette D. Clarke.











## **RATIONALE FOR REP. YVETTE D. CLARKE PROPOSED NY 11<sup>TH</sup> CONGRESSIONAL DISTRICT**

by: Latrice Monique Walker, Esq.  
[latricemwalkerresq@gmail.com](mailto:latricemwalkerresq@gmail.com)

Rep. Yvette D. Clarke is a Member of Congress representing the 11<sup>th</sup> Congressional District. As the youngest African-American woman to serve in the 112<sup>th</sup> Congress and the only African-American woman from New York, Rep. Clarke is writing the pages of American history, following in the footsteps of the late Honorable Shirley Chisholm. Rep. Clarke, who now represents the same district she once served, has taken the lead on many of the issues that plagued this district then and still exists today. With a growing immigrant population and as a Caribbean-American woman herself with a lineage in Jamaica, Rep. Clarke has brought a voice to a people who have been underserved, underrepresented, and deserve equal opportunity and access to their government.

It is the express desire of Rep. Clarke to ensure that the redistricting process results in a congressional district that respects the communities of interest of the Black Voting Age Population of Kings County neighborhoods, including but not limited to: Canarsie, Flatlands, Remsen-Village-Rugby, Flatbush, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights, as well as continuing to preserve the interests of other communities including: Prospect Heights, Gowanus, Park Slope, Carroll Gardens, Windsor Terrace, Kensington, Ocean Parkway, Midwood, Borough Park, and Prospect-Lefferts Gardens.

Rep. Clarke is committed to defending the voting rights and political representation of the Black Voting Age Population, including the Caribbean community. Keeping communities together will ensure that these communities will have a full and fair opportunity to elect candidates of their choice in accordance with the Voting Rights Act of 1965, 42 U.S.C. § 1973.

### **THE PROPOSED DISTRICT ADHERES TO CONSTITUTIONAL AND VOTING RIGHTS ACT GUIDELINES FOR REDISTRICTING**

The proposed 11<sup>th</sup> Congressional District (“the proposed district”), as submitted by Rep. Yvette D. Clarke, adheres to all Constitutional and Voting Rights Act redistricting guidelines. In drafting the attached map, the following criteria were adhered to: equal population; protecting communities of interest that reside within the proposed district; respecting political subdivisions; compactness and contiguity; and preserving the core of the prior district, which is a Section 5 covered voting rights district. See *Flateau v. Anderson*, 537 F.Supp. 257, 261 (S.D.N.Y. 1982); see also *Rodriguez v. Pataki*, 308 F. Supp. 2d 346 (S.D.N.Y. 2004).

### **PRESERVING THE CORE OF THE PRIOR DISTRICT**

The “maintenance of the cores of existing districts” is a required criterion for the enactment of new redistricting plans. See, *Puerto Rican Legal Defense and Educ. Fund, Inc. v. Gantt*, 796 F. Supp. 681, 687 (E.D.N.Y.1992); see also, e.g., *Karcher v. Daggett*, 762 U.S. 725 (1983); *Rodriguez*, 308 F. Supp. 2d at 352. By preserving the core of existing districts and

respecting the historical placement of district lines, courts not only show respect for past district lines but also preserve existing relationships between constituents and the elected officials to avoid voter confusion about which district they live in. The proposed district substantially maintains the same geographic and demographic configuration as the current district, with the exception of its expansion in size by approximately 85,219 persons, changing slightly to achieve population equality with the other districts in New York State.

The present district is a majority-minority district where racial and language minorities form a majority (at least 50% or more). According to (PL 94-171), the proposed district is comprised of a total voting age population of 55% Black, 28% White, 12% Hispanic, and 5% Asian. Thus, the proposed district would remain a majority-minority district.

### **COMPACTNESS AND CONTIGUITY**

According to the United States Census Bureau, the current district is the third most compact district in the nation. The total land area of the current district is 12.05 miles. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. An example of the overlay of the proposed district and the present district is attached for your reference. The most significant area of change is the southwest border. See, <http://2010.census.gov/2010census/data/>.

In 2002, the 11<sup>th</sup> Congressional District consisted of 654,361 persons. According to the 2010 Census, the 11<sup>th</sup> Congressional District presently has 632,488 persons, a loss of approximately 22,000 people. Thus in order to meet the 2010 Census population requirement of 717,707, the proposed 11<sup>th</sup> Congressional District must extend into South Central Brooklyn by 85,219 people.

Historically, the concentration of minorities within Central Brooklyn has allowed for the formation of compact and contiguous districts. Recent population shifts in the demographics of Central Brooklyn, however have caused the borders of the proposed district to be delineated to ensure the maintenance of a majority-minority district and to avoid vote dilution. Data from the 2010 Census supports the fact that a population shift has occurred from North-Central Brooklyn to South-Central Brooklyn.

### **SECTION 2**

In accordance with the directive of the United States Supreme Court in *League of Latin American Citizens v. Perry*, 548 U.S. 399, 433 (2006), under Section 2 of the Voting Rights Act, voting districts should include minority populations with a “community of interest.” Furthermore, the Court in *Reynolds v. Sims*, 377 U.S. 533, 566 (1964), provided that “the equal protection clause of the fourteenth amendment guarantees the opportunity for equal participation by all voters, and redistricting plans that do not achieve fair and effective representation for all

citizens impair the basic and fundamental rights secured by this amendment.” *Puerto Rican Legal Defense and Educ. Fund, Inc. v. Gantt*, 796 F. Supp. 681, 687 (E.D.N.Y.1992).

### **COMMUNITIES OF INTEREST**

The proposed 11<sup>th</sup> Congressional district was developed based on a review of census data and materials, consulting with social scientists, statisticians and other professionals who possess personal knowledge of the Caribbean community in Kings County, and work with community-based organizations and community leaders.

The proposed district further unites the common interests of the largely Caribbean, South American, African, Asian, Pakistani, Bangladeshi, Latino, and African-American ethnic communities. The proposed district is defined by shared interests, such as social, economic, cultural, linguistic, and other factors that indicate communities of interest. Some common links between these groups include the following: shared educational system; shared shopping/business corridors; shared community parks and recreational centers; common utilization of modes of public transportation.

According to the 2005-2009 American Community Survey, the present district is comprised of 56% females over the age of 18. A few issues specific to women are: reproductive freedom, SNAP, WIC and Child Health Care. Thirty-nine percent of the people living in the 11<sup>th</sup> Congressional District are foreign born; 30% of the population primarily speaks a language other than English; and 25% percent of the population (totaling 167,518 people) claim Caribbean ancestry. Caribbean-Americans are the fastest growing racial minority group in Brooklyn, New York. For this group, immigration issues are paramount. Likewise, 31% of the constituent base is employed in either the educational services, health care and social assistance industries; their workforce and labor related issues are a unifying quality. Brooklyn, New York has the largest Caribbean American population of any municipality in the nation. These findings should be deferred to in making redistricting decisions about which areas to include within congressional districts, since such districts typically encompass multiple neighborhoods. Constituents in southwest Brooklyn are also politically interrelated with their Caribbean-American counterparts in Brooklyn, New York. It is well settled that in redistricting, “manipulation of district lines can dilute the voting strength of politically cohesive minority group members”. This may be accomplished by “cracking a district whereas minority voters may be fragmented among several districts where a bloc-voting majority can outvote them, “or by “packing” them into one or a small number of districts to minimize their influence in adjacent districts. See, *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994).

As Caribbean-Americans and other Black residents in Brooklyn become more established, they migrate eastward towards Canarsie, Flatlands, Remsen-Village-Rugby, and East Flatbush moving along Rockaway Avenue and Flatlands Avenue. The Caribbean-American and Black Community has settled along these roads and maintain a local link to Rockaway

Avenue, Rockaway Parkway, Church Avenue, Flatbush Avenue, Utica Avenue, Remsen Avenue and Empire Boulevard. However, Flatbush Avenue continues to exist as the cultural heart of the Caribbean community. Caribbean-Americans and other community residents typically return to these roads for religious purposes, shopping, ethnic restaurants and culture. Despite sharing many common cultural characteristics, however, these communities are currently divided between the 10<sup>th</sup> and 11<sup>th</sup> Congressional districts. Residents rely on public transportation including the “J”, “D”, “B”, “Q”, “2”, “3”, “4” and “5” train subway lines and MTA Bus service. These communities share common interests and should be considered as one community. The population of these communities is predominantly immigrants who share many similar concerns, socio-demographic and political characteristics.

Residents have similar needs, including: language access; difficulty applying for and receiving benefits or government assistance that they are entitled to; priority on education for their children; naturalization and immigration issues; and at local legislative levels, share elected officials.

Each neighborhood should be kept as a whole and all should be kept in the same congressional district.

#### **SECTION 5**

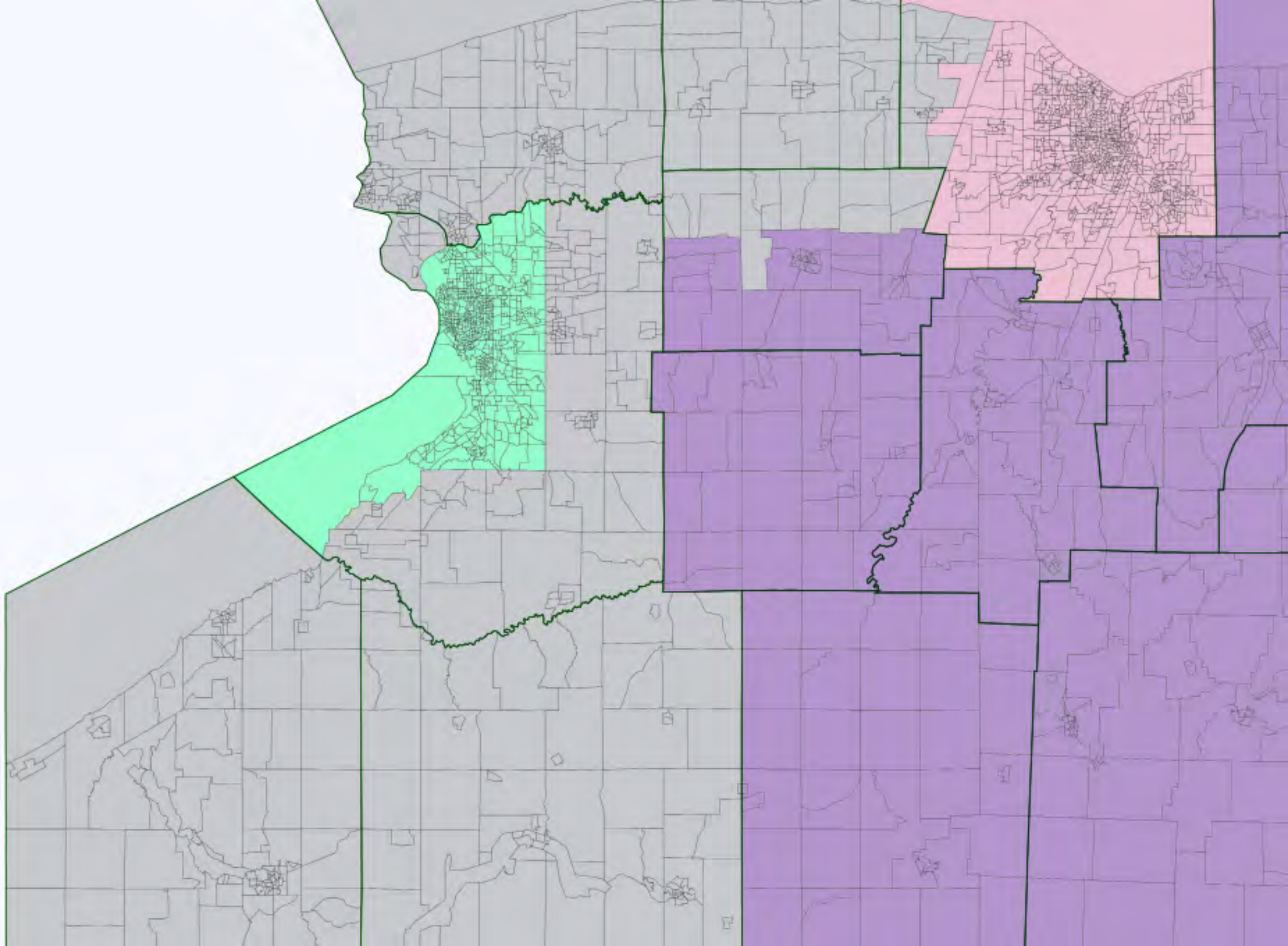
The proposed district is covered by Section 5 of the Voting Rights Act, which provides that any “qualification, prerequisite standard, practice, or procedure neither has the purpose nor the effect of denying or abridging the right to vote on account of race, or color, or [membership in a language minority group].” 42. U.S.C. 1973. In this regard, the proposed district does not have the purpose nor will it have the effect of denying or abridging the right to vote on the account of race or color. Any changes, including, the enactment of a new redistricting map constitutes a change subject to Section 5 review. See, e.g. *Georgia v. Ashcroft*, 539 U.S. 461, 471 (2003); *Beer v. United States*, 425 U.S. 130, 133 (1976). Kings County (Brooklyn) is covered by Section 5. See *Flateau v. Anderson*, 537 F. Supp. 257, 261 (S.D.N.Y. 1982); see also *Rodriguez v. Pataki*, 308 F. Supp. 2d 346 (S.D.N.Y. 2004)

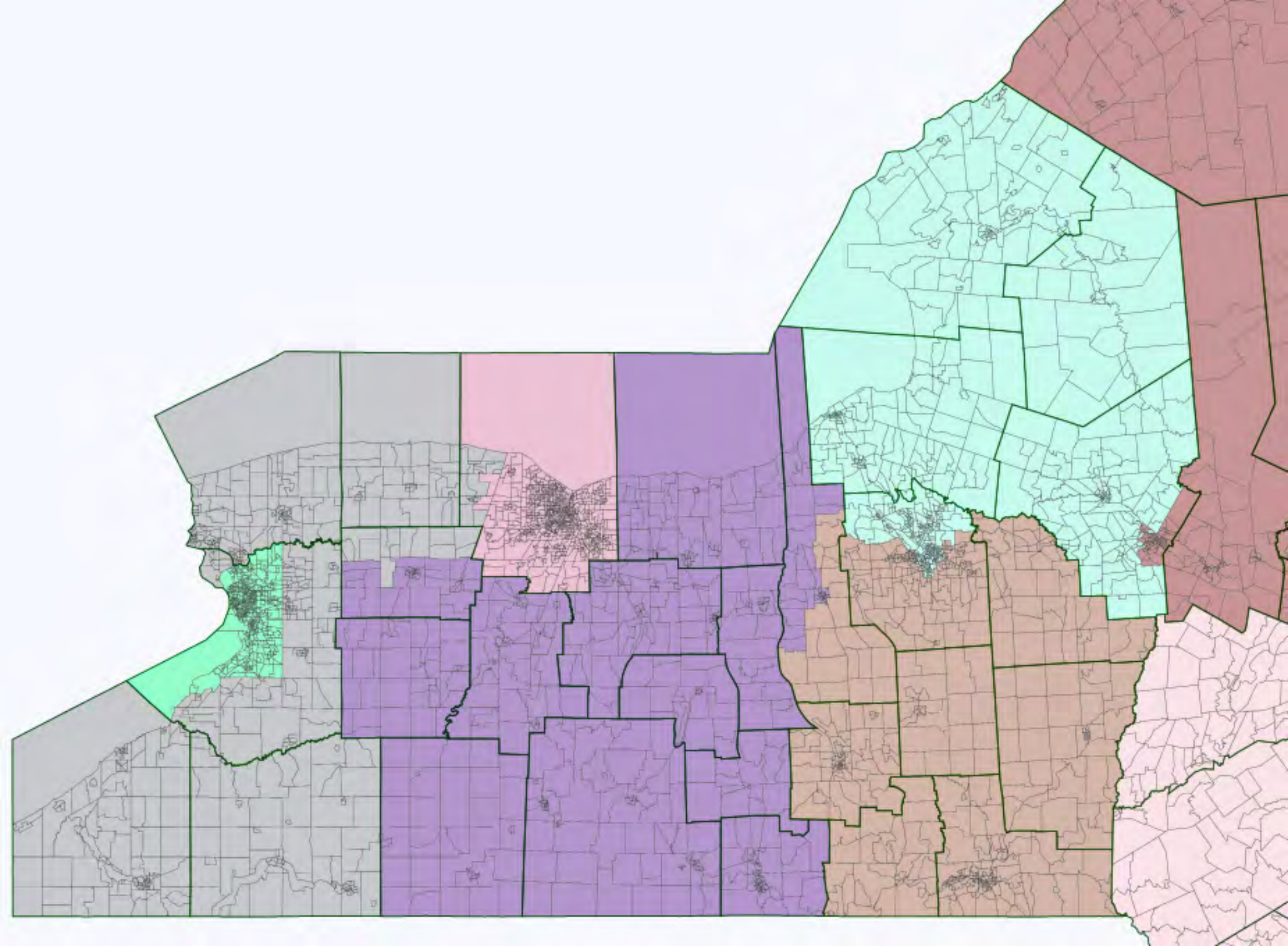
Redistricting plans cannot include changes “that would lead to a retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise.” *Beer*, 425 U.S. at 141. In order to determine whether or not a plan is retrogressive, the Court must conduct an “examination of all relevant circumstances.” *Georgia*, 539 U.S. at 479-80 (quoting *De Grandy*, 512 U.S. at 1021-21); *PRLDEF*, 796 F. Supp. at 694-95. The present map was not adopted with a discriminatory intent, nor does it have a discriminatory effect. The proposed district is not nor does it intend to dilute racial and language minority votes; in fact, its express purpose is inclusion. Nor will the change lead to racially discriminatory retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise. Although New York State will be losing two congressional districts, coupled with the fact that

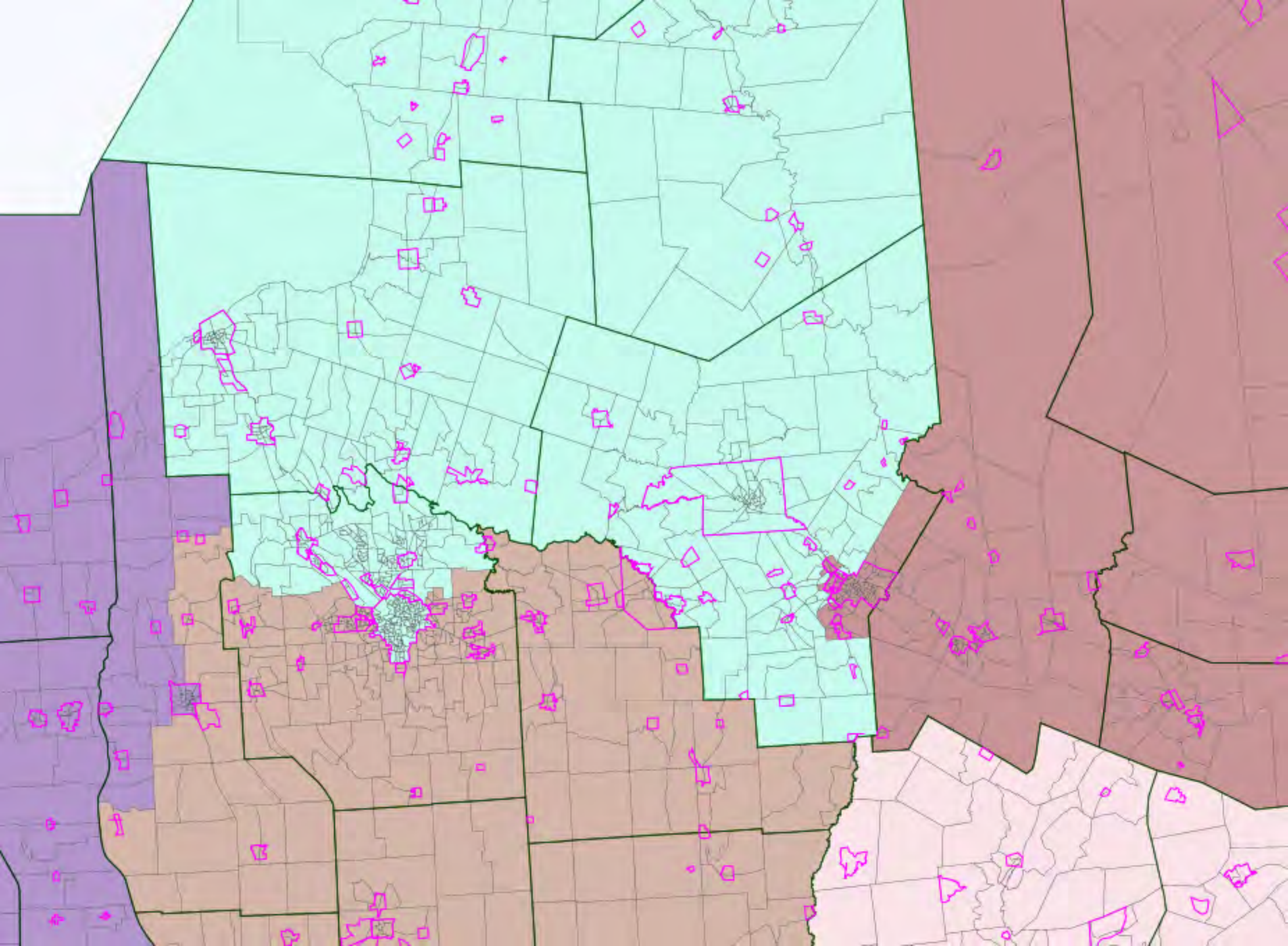
there has been a demographic shift of Brooklyn populations, the proposed map depicts an alternative solution to the 11<sup>th</sup> Congressional District that maximizes the number of Black Voting Age Population.

**CONCLUSION**

I urge that you give your most utmost consideration to this proposed map for the 11<sup>th</sup> Congressional District of New York, as introduced by Rep. Yvette D. Clarke.









My name is Connor James Allen, and I have drawn what I think is a fair map of New York state's congressional districts for the decade 2012-2021. Reapportionment has led to New York losing two districts, and this necessitates significant change in the current districts. Because of this in some places I have deviated from the current numbering system, though it is fairly arbitrary to say which district has which number.

Initially I drew the current districts which have majorities of black or Hispanic residents, and tried to find the best way to keep all African American districts above 50% black in voting age population, and how to increase the Hispanic populations in the two districts where there was now only 40-45% Hispanic population by voting age population to retain minority voting power in those districts. I think my adjustments maintained or improved the ability of minority communities to elect a representative of their choosing. Other changes created an Asian-plurality district, my 5<sup>th</sup> district, which emerged naturally in response to adjustments increasing the share of African Americans in the 6<sup>th</sup> district to meet Voting Rights Act requirements.

After I drew the VRA districts I began working on other downstate districts, beginning with NY-01, trying to keep it as close to how it currently is as possible, and did the same. Because of increasing deviations from the current lines on account of the necessary changes from losing two districts, and from adding new territories to the VRA districts, this results in ever greater changes, until by the time of the 5<sup>th</sup> and 14<sup>th</sup> districts and beyond, they were little recognizable. I strove to maintain as compact districts as possible, staying within boroughs and neighborhoods to the extent possible, and put disparate communities together as little as possible. It is not always easy to do such a thing, but I did end up creating compact districts. Additionally, while my 4<sup>th</sup> district is an amalgam of the current 4<sup>th</sup> and 5<sup>th</sup> districts, the new 5<sup>th</sup> district which emerged from leftover areas (areas leftover after carving out Hispanic and African American districts) was not only compact, but as I said, has an Asian-American plurality. The current district 9 was done away with naturally as a result of drawing the minority districts as well, because it had drawn together different regions which had no particular reason to be together.

Further upstate I paid some attention to the current district lines, but generally tried to draw competitive, compact districts. This meant that the current district 22 was undone, as it drew together many communities which had no business being in the same district and was not compact at all. Compact Buffalo, Rochester, and Syracuse districts were drawn, on the other hand, cleaning up the current lines somewhat.

As far as population equality and contiguity, I did my best. According to my data, which is of course out of date moments after it is compiled, the deviations from ideal were as little in one district as 0, to as large in another as 110 persons. My districts are contiguous, going over water in areas where I could find bridges connecting them to other landmasses.

Thank you for the opportunity to present my submission. I do not pretend to have the legal expertise to defend my drawing of the VRA districts in particular, but I hope you will be interested in any novel approaches I have made to drawing New York's congressional districts.

# district 11 former district 1



# district 11 census

CD 11		
Total Population		
All	Pop	%
Tot	707,248	
Wh	549,845 (77.7)	
Bl	32,162 (4.5)	
Hsp	90,058 (12.7)	
Asn	22,932 (3.2)	
Nat	1,762 (0.2)	
Oh	10,489 (1.5)	
Voting Age Pop		
18+	Pop	%
Tot	543,894	
Wh	434,443 (79.9)	
Bl	23,419 (4.3)	
Hsp	61,455 (11.3)	
Asn	17,735 (3.3)	
Nat	1,330 (0.2)	
Oh	5,512 (1.0)	

**THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY**



HAKEEM JEFFRIES  
Assemblyman 57<sup>TH</sup> District

March 6, 2012

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Judge Mann:

I write to strongly object to the proposed congressional lines recently presented by the court.<sup>1</sup>

Historically, the traditionally African-American neighborhoods of Fort Greene and Clinton Hill have been linked together as one “community of interest” within the 10th congressional district. They are served by the same community board, the same police precinct, the same school district, the same bus and subway lines, the same firehouses, and the same central commercial corridors on Fulton Street and Myrtle Avenue.

This “community of interest” is closely connected to the predominantly African-American community of Bedford-Stuyvesant that is immediately adjacent to the east. These three neighborhoods are all linked by the same commercial corridor along Fulton Street and the same mass transportation along the A, C and G lines. School District 13 also includes the neighborhoods of Fort Greene, Clinton Hill, Prospect Heights and parts of Bedford-Stuyvesant.

As “communities of interests” these three neighborhoods have benefited from existing within the same congressional district for approximately three decades and should remain together. Consistent with the legal objective of preserving “communities of interests” and continuity of representation, it is unclear why the proposed congressional map for the new NY-8 jettisons Fort Greene and Clinton Hill (as well as parts of Prospect Heights) and replaces them with neighborhoods in the far reaches of Brooklyn and Queens, including Gerritsen Beach, Gravesend, Georgetown, Ozone Park Woodhaven and Howard Beach. This mismatched

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<sup>1</sup> Since 2007, I have represented the 57<sup>th</sup> Assembly district in the New York State Assembly. This district includes the neighborhoods of Fort Greene, Clinton Hill, Prospect Heights, as well as parts of Crown Heights and Bedford-Stuyvesant. Presently, I am a declared candidate to represent the community of the 10<sup>th</sup> Congressional district.

marriage does not appear to serve the best interests of any of the residents involved.

According to these proposed lines, only one congressional district now resides entirely within Kings County, notwithstanding the fact that at 2.5 million residents Brooklyn is the largest county in New York State. Indeed, we can accommodate three entire congressional districts wholly within the borders of the county. In this context, there is no plausible reason why the new NY-8 reaches into Queens to pick up three additional neighborhoods that have nothing in common demographically with the communities that have traditionally made up the 10th congressional district.

It is also deeply troubling that the map for the proposed new NY-8 fails to take into consideration the express concerns presented to the court by a coalition of prominent clergy members, civic leaders, community activists and service providers from Fort Greene and Clinton Hill. (See attached Exhibit A). These concerns further amplify the need to keep the Fort Greene and Clinton Hill neighborhoods as part of the new NY-8, particularly when the alternative is replacement by newer communities such as Gerritsen Beach, Gravesend, Georgetown, Ozone Park Woodhaven and Howard Beach.

For the reasons set forth above, I strongly urge the court to modify its proposed plan and preserve the communities of Fort Greene and Clinton Hill (as well as parts of Prospect Heights) within the new NY-8. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in cursive script that reads "Hakeem Jeffries". The signature is written in dark ink and is positioned above the typed name.

Hon. Hakeem Jeffries  
NYS Assembly (D-57)

## *Concerned Citizens of Fort Greene-Clinton Hill*

March 2, 2012

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Judge Mann:

Thank you for this opportunity to comment on the proposed Congressional lines for Brooklyn, and specifically, on the 10<sup>th</sup> Congressional district. The 10<sup>th</sup> Congressional district is a Voting Rights Act district that includes the neighborhoods of Fort Greene, Clinton Hill, Bed-Stuy, Brownsville, East New York and Canarsie. Since the passage of that historic law in 1965, diverse communities in places like New York City have been grouped together in congressional districts to provide the best opportunity for proportional ethnic and racial representation. Here in central Brooklyn, the African-American community benefits from the majority-minority district lines for the 10<sup>th</sup> Congressional district. We write because we are seriously concerned that the district lines recently released upend that history and may defy some of the basic requirements of federal law.

First, this map cracks the Fort Greene and Clinton Hill communities and places parts of each neighborhood in two congressional districts. These two traditionally African-American neighborhoods are really one “community of interest”. They are served by the same community board, the same police precinct, the same school district, the same bus and subway lines, the same firehouses, and the same central commercial corridors on Fulton Street and Myrtle Avenue. The maps released instead move most of the traditionally African-American neighborhood of Fort Greene into a neighboring district to the south. Consistent with the principles of the Voting Rights Act, the neighborhoods of Fort Greene and Clinton Hill should be kept whole and remain entirely within the 10<sup>th</sup> congressional district.

We are also concerned because these same maps also remove Fort Greene’s largest public housing project – the Farragut Houses, again largely African-American – from the 10<sup>th</sup> Congressional district. As a result, residents of Farragut are cast off into the adjacent district to the north, thereby further diluting the African-American presence in the 10<sup>th</sup> Congressional district, separating the Farragut Houses from their traditional community of interest.

Since the bygone era of the crack epidemic of the 80’s when Myrtle Avenue was known as “Murder Avenue,” many of our residents remained in these neighborhoods. We have built a wonderfully diverse community through hard work, perseverance and political cohesion. We need to make sure that the integrity of this district is maintained by keeping the Clinton Hill and Fort Greene communities of interest together. As a district that falls within the Voting Rights Act, and one that has consistently adhered to the “one district, one vote” rule, to break our

community up defies the spirit of the law and a fair redistricting process. It requires immediate redress.

Consequently, we have attached a proposed map for the 10<sup>th</sup> Congressional District that fairly keeps the communities of Fort Greene and Clinton Hill in the 10<sup>th</sup> District and is consistent with the requirements under the 1965 Voting Rights Act.

Thank you,

**Concerned Citizens of Fort Greene-Clinton Hill**

Councilmember Letitia James, District 35

Reverend Clinton M. Miller, Pastor, Brown Memorial Baptist Church

Reverend Linda Bell, St. Lukes Church

Ed Brown, President, Ingersoll Houses

Jamel Gaines, Founder and Artistic Director of Creative Outlet

David Goldsmith, 2<sup>nd</sup> Vice President CEC 13 and District 13 Parent

Delia Hunley-Adossa, President, 88<sup>th</sup> Precinct Council

Lenny Singletary, Active Community Member

Ruth Goldstein, Community Activist

Florence Timothy, Community Activist

Tay and Bernadette Hamilton, 345 Clinton Avenue

Virginia Canady, Ms. Jenny Cares Community Outreach

Annie Stevenson-King, AARP Legislative District Advocacy Coordinator

Laurie Cumbo, Community Leader

Shirley McRae, Community Activist



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

COMMITTEES  
Banks  
Children and Families  
Consumer Affairs and Protection  
Education  
Housing  
Mental Health

KARIM CAMARA  
Assemblyman 43<sup>RD</sup> District  
Kings County

March 6, 2012

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Judge Mann:

As chair of the New York State Black, Puerto Rican, Hispanic & Asian Caucus, I write to strongly object to the Brooklyn congressional maps recently released by the court and the splitting of traditional African-American and Caribbean-American communities of interest throughout the borough. The core communities that have traditionally been part of the 10<sup>th</sup> and 11<sup>th</sup> districts – both protected under the Federal Voting Rights Act – have been decimated without any reasonable explanation.

The new NY-9 is a version of a current district where Caribbean-Americans hold a strong plurality. However, these maps extend that district north to include the traditionally African-American neighborhoods of Fort Greene and Clinton Hill. Meanwhile, in the new NY-8, heavily white neighborhoods of Gerritsen Beach, Gravesend, Mill Basin and Georgetown in Brooklyn, and Ozone Park, Howard Beach and Woodhaven in Queens, are all added for the first time. These neighborhoods have nothing in common – racially, culturally, geographically, ideologically or socioeconomically – with the African-American neighborhoods of central and east Brooklyn and it would be a grave mistake to include them.

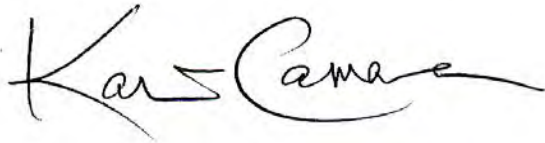
In addition to excluding traditionally African-American communities from the new NY-8, this map also removes the homes of Rep. Edolphus Towns and Assemblyman Hakeem Jeffries, both of whom are declared candidates for the 10<sup>th</sup> Congressional district, have raised hundreds of thousands of dollars, respectively and have been presenting their candidacies throughout the district during the last several months. The plan proposed by the court will short-circuit a democratic contest that is already underway, possibly depriving hundreds of thousands of African-American and Latino voters the opportunity to support the candidate of their choice. Given the accelerated primary schedule with the date being moved up from September to June, dramatically changing the neighborhoods within these two Voting Rights Act districts at the eleventh hour will heighten confusion, reduce electoral participation and promote voter disenfranchisement.

The issues presented by these radically redrawn maps can be resolved. The effort to include the Coney Island communities – which have never before been part of a Voting Rights district – seems well intentioned. However, including Coney Island in the new NY-8 requires the addition of the above mentioned neighborhoods of Gerritsen Beach, Gravesend, Mill Basin, Georgetown, Ozone Park, Howard Beach and Woodhaven. Instead of jettisoning the traditionally African-American communities of Fort Greene, Clinton Hill and parts of Prospect Heights that have long been within the 10<sup>th</sup> Congressional District, Coney Island would more clearly benefit from inclusion in the new NY-9.

In a new iteration, NY-9 could move south from the neighborhoods of Flatbush and Midwood, adding Gravesend and Coney Island. Eastern Parkway could then serve as NY-9's northern border. At the same time, the new NY-8 could move west, to take back in Fort Greene, Clinton Hill, Prospect Heights and southern Williamsburg, communities that were inexplicably removed simply to accommodate the addition of Coney Island. Fort Greene, Clinton Hill and parts of Prospect Heights have traditionally shared the same congressional district and are a community of interest, sharing bus and subway lines, commercial corridors, public schools and police and fire precincts. These communities have resided in the 10<sup>th</sup> Congressional district for the last thirty years and should remain as such.

Please feel free to contact my office to the extent you need additional information.

Respectfully submitted,

A handwritten signature in black ink that reads "Karim Camara". The signature is written in a cursive style with a long, sweeping underline.

Hon. Karim Camara  
NYS Assembly (D-43)  
Chair, NYS Black, Puerto Rican, Hispanic & Asian Caucus





Dear Member of the court

Please do not allow the NY 25<sup>th</sup> district to be redrawn as proposed. The current district is a fair and even district that was based on geography. The proposed district harms me to be forced into a district that is created for political means only and insures a loss before the election even happens.

Thank You

Charles Baldo  
95 Endicar Drive  
Rochester NY 14622

25<sup>th</sup> congressional district

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court – Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

2 March 2012

Dear Judge Mann –

Pursuant to the Court's February 28, 2012 Order, I respectfully submit this letter urging the Court's consideration of several factors to consider in drawing congressional redistricting maps.

New York is a difficult state to draw lines in, in part because Long Island and Staten Island have a lot of population and don't connect to the rest of the state. Also, the configuration with the narrows just below the Tappan Zee causes New York City districts to squeeze north, or the Westchester district to squeeze south.

I respectfully remind the Court that the Voting Rights Act was enacted as a short-term solution to once pervasive and systemic "state-sponsored" discrimination thwarting meaningful political participation by black citizens. Voting rights is not a numbers game. The voting rights act guards against governmental efforts denying political participation to Americans based upon their race, language or national origin.

More importantly, the Voting Rights Act is not meant to produce an expected outcome. Redistricting should not be used to rig electoral outcomes favoring any race, national group, political party or incumbent official.

The Court must dismiss misguided efforts and plans creating racially "separate but equal" congressional districts. The integrity of the Voting Rights Act and living up to our national creed— "that all men are created equal"— are more important.

No one, however, wants to lose veteran lawmakers because seniority does count for so much in Washington. But it makes more sense for downstate city and suburban voters to fend off efforts decreasing our collective clout. If two congressional districts must be eliminated then it should occur in western and central New York where population losses are the greatest, not downstate.

Collective congressional seniority is also the greatest downstate. Seven of the eleven upstate representatives (north of Westchester) entered office since 2009. The best possible solution would involve creating two “fair fight” districts pitting Republican and Democratic incumbents against each other in each upstate region.

The Buffalo News has speculated that “fair fights” could be drawn up, with the most likely battles pitting either Democrats **Kathy Hochul** (NY-26) or **Brian Higgins** (NY-27) against Republican **Tom Reed** (NY-29); Republican **Ann Marie Buerkle** against Democrat **Bill Owens** (NY-23); or Owens against Republican **Richard Hanna** (NY-24).

Fair fight districts would offer competitive general election contests which reform groups have long demanded and lets the voting public decide. The previously accepted practice of each political party agreeing to eliminate a district is anti-democratic.

Such tacit agreements empower party leaders and special interests at the expense of the electorate. The often smaller primary election battles guarantee each party retaining political control of the district by eliminating an unpleasant incumbent. Party primaries are not representative of the general electorate.

Respectfully, I again would look to protect senior members over freshman Members of Congress. For example, keep King (NY-2), drop Turner (NY-9). I think the key to a fair redistricting plan lay in the center of the state: Syracuse, Utica, Ithaca, and in the lower Hudson Valley region. A good government approach would be the fair fight approach.

Fair fight districts would offer the competitive general election contests that reform groups demand and lets voters decide. The previously accepted practice of each political party agreeing to eliminate a district is undemocratic.

The Court's resulting redistricting plan should result in districts that:

- Contain populations that vary no more than 5 percent;
- Are reasonably compact and contiguous;
- Unite communities of interest;
- Apportion prison inmates in their home communities; and
- Are free of overt partisan advantage.

Congressional redistricting should be based on demographics and geography, not age, personality or politics. Upstate voters should decide the electoral fates of their congressional representatives.

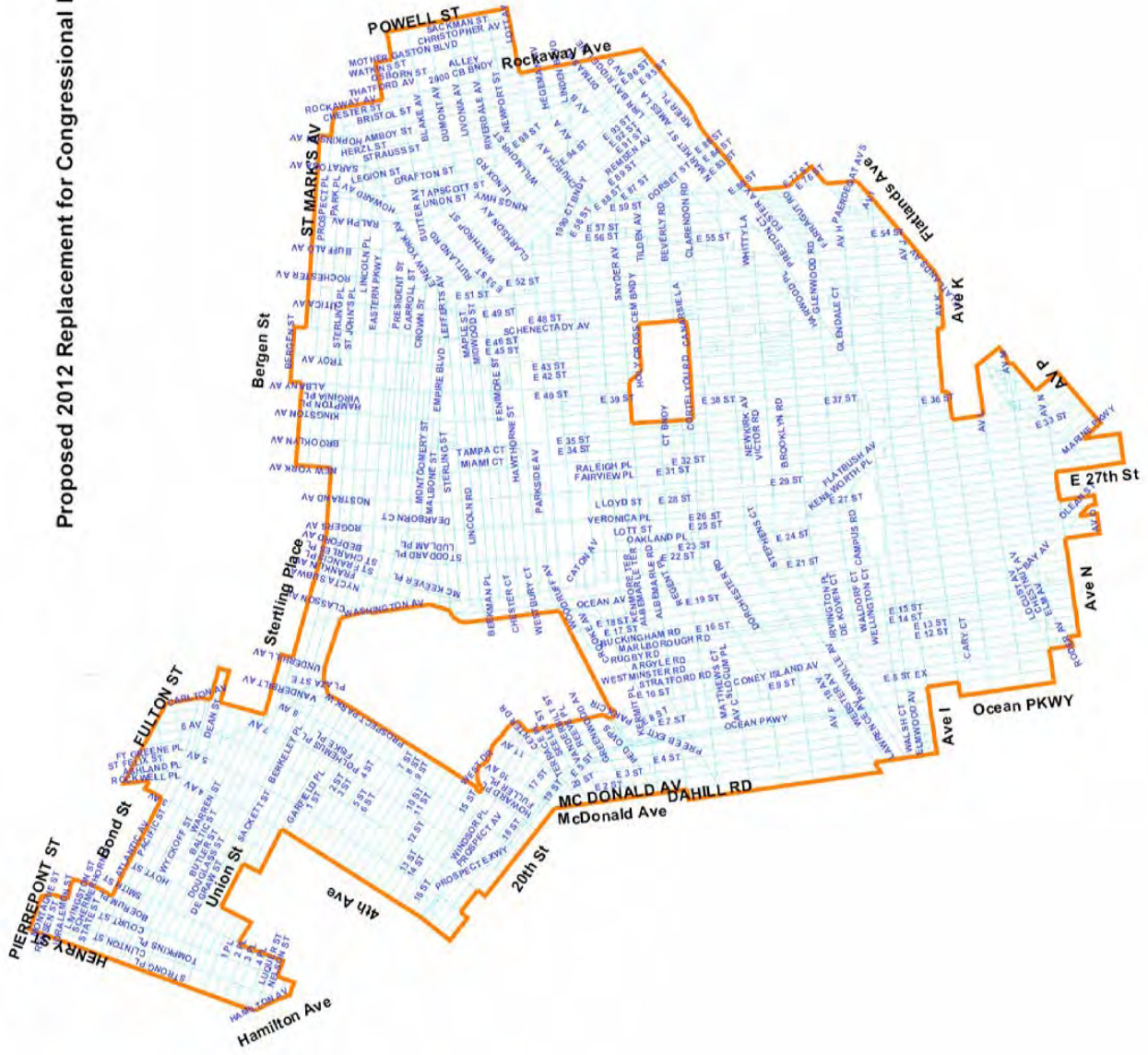
Respectfully, submitted by

Michael Benjamin

Former Member of Assembly

Bronx - 79

Proposed 2012 Replacement for Congressional District 11



The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court – Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

2 March 2012

Dear Judge Mann –

Pursuant to the Court's February 28, 2012 Order, I respectfully submit this letter urging the Court's consideration of several factors to consider in drawing congressional redistricting maps.

New York is a difficult state to draw lines in, in part because Long Island and Staten Island have a lot of population and don't connect to the rest of the state. Also, the configuration with the narrows just below the Tappan Zee causes New York City districts to squeeze north, or the Westchester district to squeeze south.

I respectfully remind the Court that the Voting Rights Act was enacted as a short-term solution to once pervasive and systemic "state-sponsored" discrimination thwarting meaningful political participation by black citizens. Voting rights is not a numbers game. The voting rights act guards against governmental efforts denying political participation to Americans based upon their race, language or national origin.

More importantly, the Voting Rights Act is not meant to produce an expected outcome. Redistricting should not be used to rig electoral outcomes favoring any race, national group, political party or incumbent official.

The Court must dismiss misguided efforts and plans creating racially "separate but equal" congressional districts. The integrity of the Voting Rights Act and living up to our national creed— "that all men are created equal"— are more important.

No one, however, wants to lose veteran lawmakers because seniority does count for so much in Washington. But it makes more sense for downstate city and suburban voters to fend off efforts decreasing our collective clout. If two congressional districts must be eliminated then it should occur in western and central New York where population losses are the greatest, not downstate.

Collective congressional seniority is also the greatest downstate. Seven of the eleven upstate representatives (north of Westchester) entered office since 2009. The best possible solution would involve creating two “fair fight” districts pitting Republican and Democratic incumbents against each other in each upstate region.

The Buffalo News has speculated that “fair fights” could be drawn up, with the most likely battles pitting either Democrats **Kathy Hochul** (NY-26) or **Brian Higgins** (NY-27) against Republican **Tom Reed** (NY-29); Republican **Ann Marie Buerkle** against Democrat **Bill Owens** (NY-23); or Owens against Republican **Richard Hanna** (NY-24).

Fair fight districts would offer competitive general election contests which reform groups have long demanded and lets the voting public decide. The previously accepted practice of each political party agreeing to eliminate a district is anti-democratic.

Such tacit agreements empower party leaders and special interests at the expense of the electorate. The often smaller primary election battles guarantee each party retaining political control of the district by eliminating an unpleasant incumbent. Party primaries are not representative of the general electorate.

Respectfully, I again would look to protect senior members over freshman Members of Congress. For example, keep King (NY-2), drop Turner (NY-9). I think the key to a fair redistricting plan lay in the center of the state: Syracuse, Utica, Ithaca, and in the lower Hudson Valley region. A good government approach would be the fair fight approach.

Fair fight districts would offer the competitive general election contests that reform groups demand and lets voters decide. The previously accepted practice of each political party agreeing to eliminate a district is undemocratic.



The Court's resulting redistricting plan should result in districts that:

- Contain populations that are equal as required by law;
- Are reasonably compact and contiguous;
- Unite communities of interest;
- Apportion prison inmates in their home communities; and
- Are free of overt partisan advantage.

Congressional redistricting should be based on demographics and geography, not age, personality or politics. Upstate voters should decide the electoral fates of their congressional representatives.

Respectfully, submitted by

Michael Benjamin

Former Member of Assembly

Bronx - 79



OFFICE OF THE BRONX BOROUGH PRESIDENT  
THE BRONX COUNTY BUILDING  
851 GRAND CONCOURSE  
BRONX, NEW YORK 10451

RUBEN DIAZ JR.  
BOROUGH PRESIDENT

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March 2, 2012

Judge Roann L. Mann  
United States District Court  
Eastern District of New York  
22 Cadman Plaza East  
Brooklyn, NY 11201

Dear Judge Mann:

This letter is to alert you to our concerns, and the concerns of all 1.4 million residents of the Bronx, regarding any proposed Congressional redistricting proposal that would dilute the Bronx's representation in the United States Congress.

As per the 2010 Census, the Bronx has seen significant growth in its population, especially among our Black and Latino populations. Given that, it would be appropriate—if not expected—that the Bronx would see its representation in the United States Congress expanded, rather than diminished.

However, various discussions on new Congressional lines have focused on carving up the Bronx into multiple smaller pieces, in order to benefit the political leadership of any other county.

Over the past few years, the elected leadership of the Bronx has been united as never before, and we remain united on the issue of redistricting. It is unacceptable that the population of the Bronx would be potentially split among two new districts in an effort to make up for population losses among Voting Rights Act affected communities in other counties.

With that in mind, our current Voting Rights Act district, represented by Rep. Jose Serrano, must be respected and remain wholly within the Bronx. In addition, both Rep. Serrano and Rep. Eliot

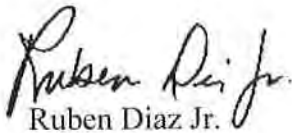
PRESIDENT OF THE BOROUGH OF THE BRONX

Engel are lifelong Bronxites who have represented parts of our borough for their entire careers. If the Bronx were to lose their collective seniority in Washington—and the clout that comes with it—it would do our borough tremendous harm.

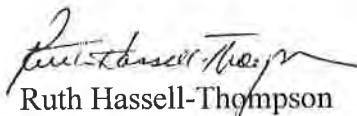
New congressional district lines should mirror the success that has occurred in the Bronx, and not dilute our political influence for the benefit of other counties. Emerging new and well-established communities should not be divided to dilute their growing electoral power.

The people of the Bronx have a right to be able to determine who their representatives will be, and their will should not be subjugated through the political machinations of any other county.

Sincerely,



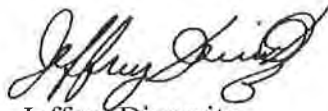
Ruben Diaz Jr.  
Bronx Borough President



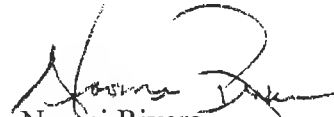
Ruth Hassell-Thompson  
NYS Senate



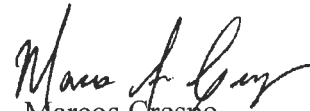
Rev. Ruben Diaz Sr.  
NYS Senate



Jeffrey Dinowitz  
NYS Assembly



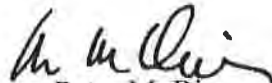
Naomi Rivera  
NYS Assembly



Marcos Crespo  
NYS Assembly




Nelson Castro  
NYS Assembly



Peter M. Rivera  
NYS Assembly



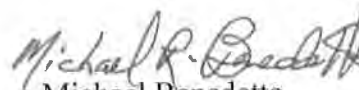
Vanessa Gibson  
NYS Assembly



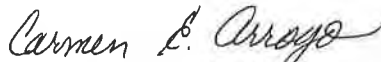
Jose Rivera  
NYS Assembly



Carl E. Heastie  
NYS Assembly




Michael Benedetto  
NYS Assembly



Carmen E. Arroyo  
NYS Assembly



Eric Stevenson  
NYS Assembly



Annabel Palma  
NYC Council



G. Oliver Koppell  
NYC Council



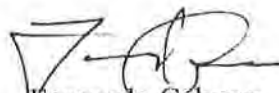
Maria del Carmen Arroyo  
NYC Council



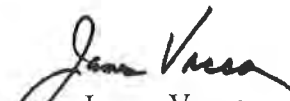
Joel Rivera  
NYC Council



Helen D. Foster  
NYC Council



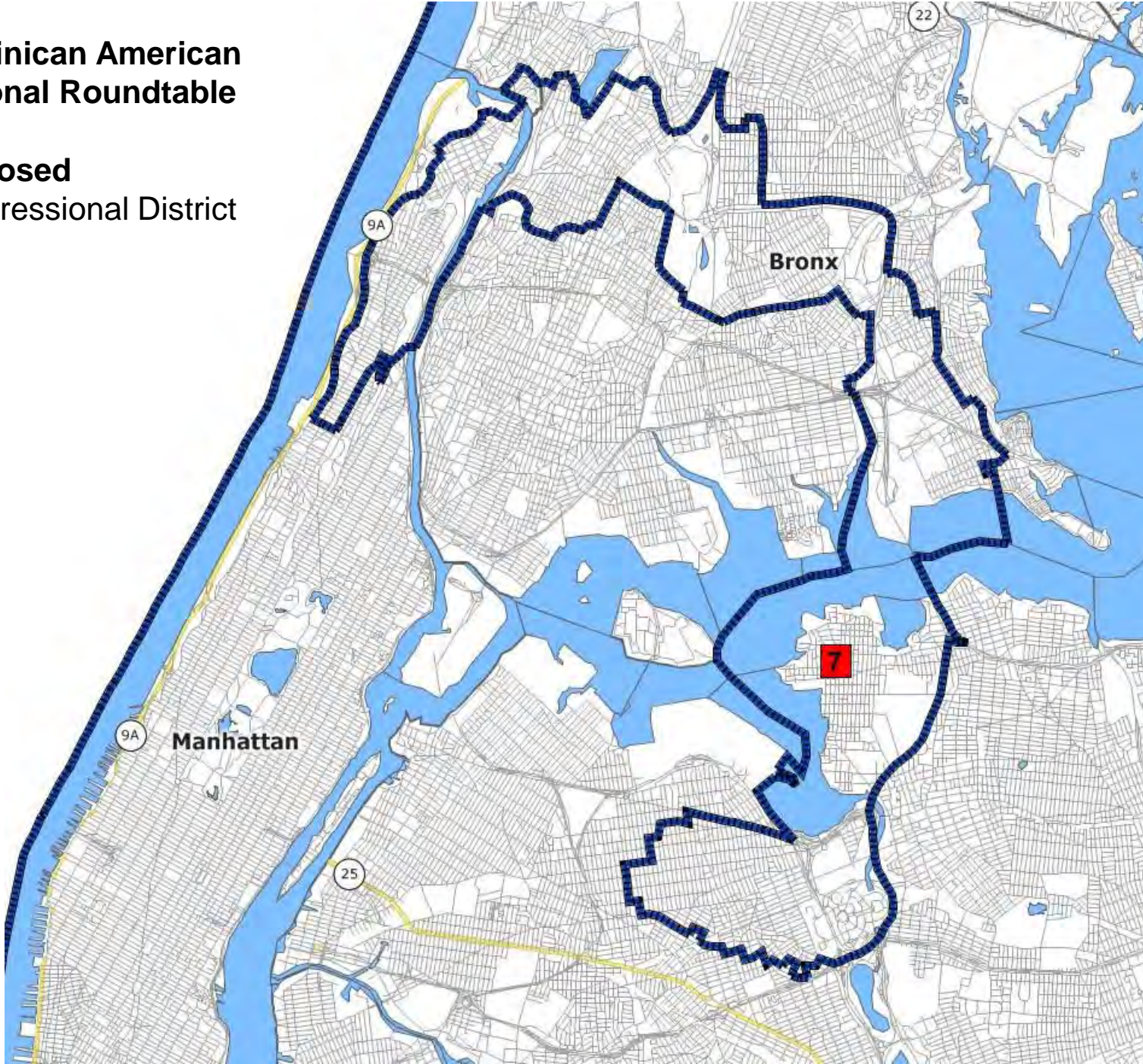
Fernando Cabrera  
NYC Council



James Vacca  
NYC Council

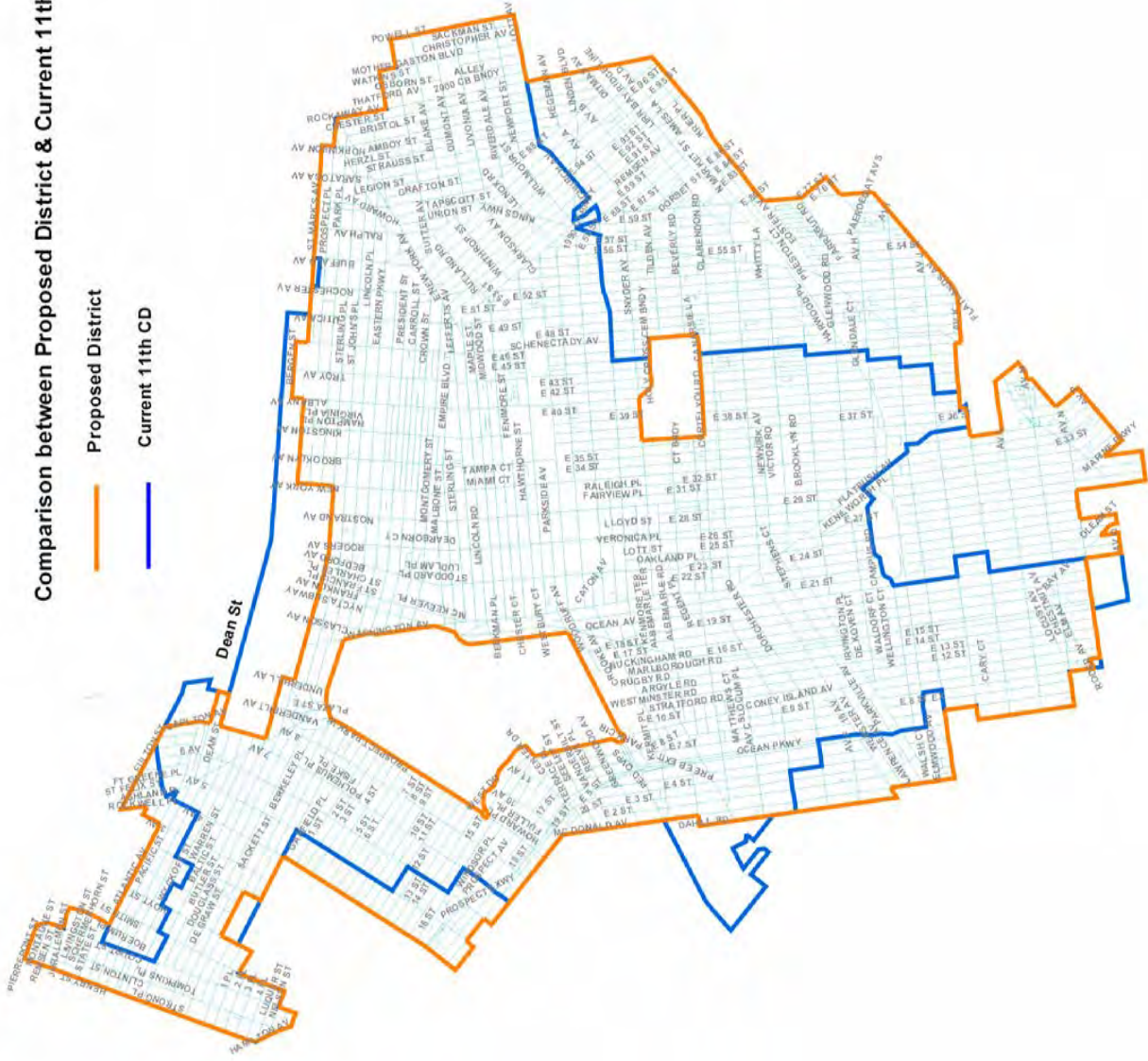
**Dominican American  
National Roundtable**

**Proposed  
Congressional District**

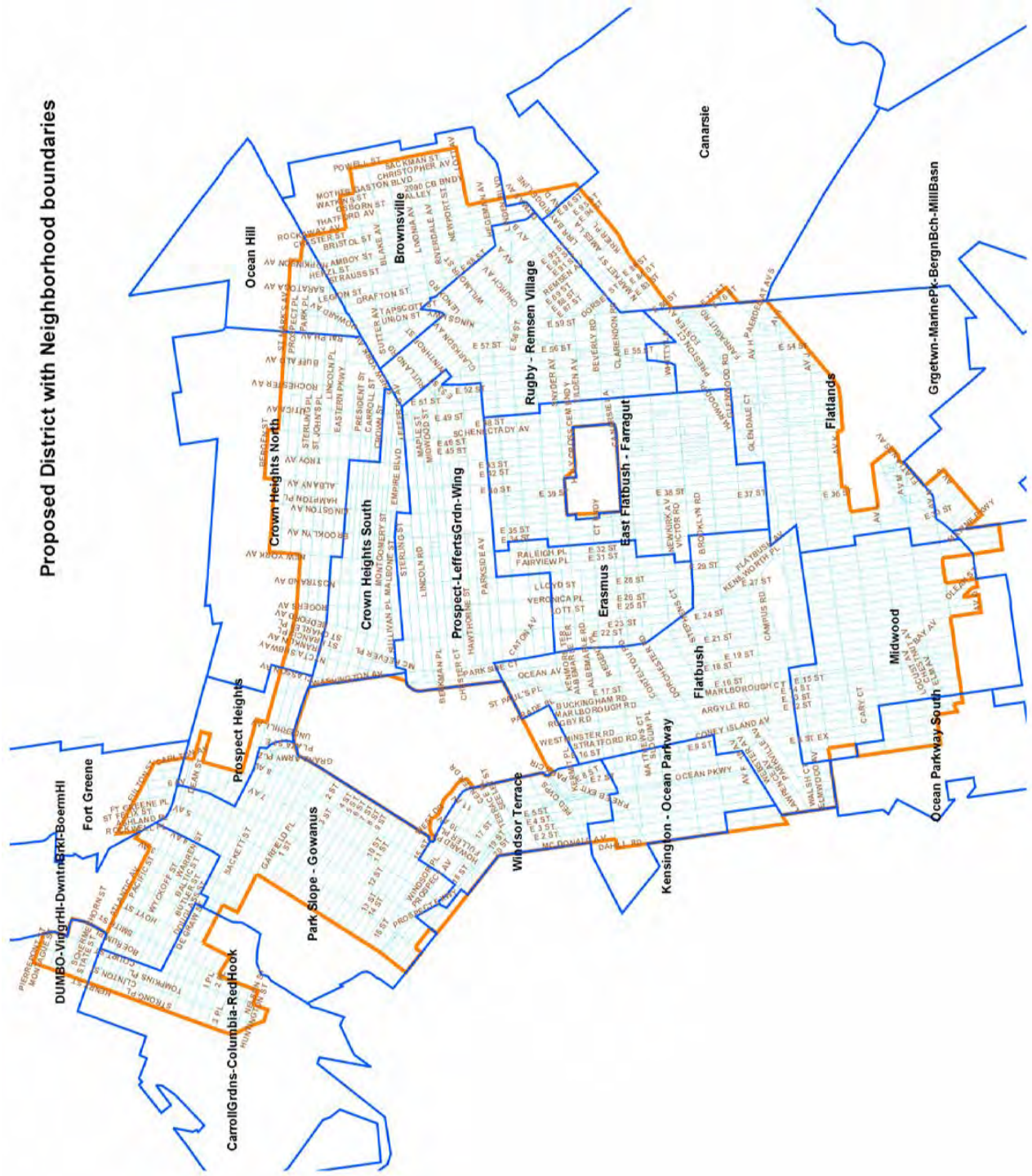


# Comparison between Proposed District & Current 11th CD

- Proposed District
- Current 11th CD



Proposed District with Neighborhood boundaries









2010 REDISTRICTING DATA SF ( PL 94 -171)

		P2 TOTALS	P2 PCT of TOTALS
<b>P2</b>	<b>Hispanic or Latino &amp; Not Hispanic or Latino by Race</b>		
	RACE / ETHNICITY		
	Hispanic or Latino	89845	12.5%
	Not Hispanic: White alone	197368	27.5%
	Not Hispanic: Black or African American alone	375762	52.4%
	Not Hispanic: Asian alone	36129	5.0%
	Not Hispanic: American Indian and Alaskan Native alone	1559	0.2%
	Not Hispanic or Latino: Native Hawaiian and Other Pacific Islander alone	185	0.0%
	Not Hispanic or Latino: Some Other Race alone	3123	0.4%
	Not Hispanic or Latino: Two or More Races	13736	1.9%
	TOTAL:	717707	99.9%
<b>P4</b>	<b>Hispanic or Latino &amp; Not Hispanic or Latino by Race</b>		
	for Population 18 years and over		
	RACE / ETHNICITY		
	Hispanic or Latino	66010	12.0%
	Not Hispanic: White alone	154610	28.0%
	Not Hispanic: Black or African American alone	289641	52.5%
	Not Hispanic: Asian alone	28130	5.1%
	Not Hispanic: American Indian and Alaskan Native alone	1084	0.2%
	Not Hispanic or Latino: Native Hawaiian and Other Pacific Islander alone	158	0.0%
	Not Hispanic or Latino: Some Other Race alone	2190	0.4%
	Not Hispanic or Latino: Two or More Races	9391	1.7%
	TOTAL:	551214	100.0%

March 7, 2012

The Honorable Roanne L. Mann  
Magistrate Judge  
United States District Court  
Eastern District of New York  
22 Cadman Plaza East  
Brooklyn, NY 11201

Dear Magistrate Judge Mann:

On behalf of non-party the Dominican American National Roundtable (the “DANR”), and pursuant to the Court’s Order of March 6, 2012, we respectfully submit this objection to the “Proposed Plan” (as defined in such Order), insofar as it pertains to proposed Congressional Districts 13, 14 and 15.

The geographic regions covered by these proposed districts include the northern part of Manhattan, the west Bronx and the Corona/ Jackson Heights neighborhoods of Queens, areas that are heavily populated by Spanish speaking residents, and areas in which the Hispanic population has substantially increased since the 2000 census. As the Court will recall, in advance of the hearings on March 5, 2012, the DANR submitted a map that, taking cognizance of the community of interest that binds these neighborhoods, united them into a single, new congressional district. For the Court’s convenience, a copy of that map ( the “Map”) is attached.

In the Proposed Plan, however, the Court rejected the DANR’s Map and instead created a fragmented series of districts that, respectfully, “tell [ ] a tale of disparity not community.” See Miller v Johnson, 515 U.S. 900, 908 (1995). Thus, proposed District 13 is largely the District now represented by Congressman Rangel, but a heavily Hispanic portion of the Kingsbridge area of The Bronx has been fused into that District. The areas east of Kingsbridge are divided between the proposed 15<sup>th</sup> District, in what is now predominantly Congressman Serrano’s District, and a proposed 14<sup>th</sup> District, encompassing Pelham Parkway to I-95, then snaking down to Queens, in what is now Congressman Crowley’s District.

As we understand it, this would result in a small numerical Hispanic voting age population (“VAP”)

March 7, 2012

Page 2

majority in the proposed 13<sup>th</sup> District, and a significant non-Hispanic majority in the proposed 14<sup>th</sup> District. Given the dynamic of the 13<sup>th</sup> District, with a well-known incumbent and the likelihood that the majority of the actual registered voters (and per force the likely voters in any election) would not be Hispanic, and the less favorable statistics in the 14<sup>th</sup> District, also represented by a strong incumbent, the Proposed Plan essentially maintains the status quo and does not increase Hispanic representation. In other words, there would still be three districts, with only one likely, as a practical reality, to elect a Hispanic representative, despite the significant increase in Hispanic population in the relevant areas.

This, we respectfully suggest, should result in the Court's taking a second look at the merits of the DANR Map, and that second look should confirm that the DANR Map is a better accommodation of relevant interests than is the Proposed Plan. Preliminarily, it should be noted, since the Court is dealing with covered districts here, that the DANR Map would cause no retrogression. The Proposed Districts 13 and 15 would likely maintain their existing minority representation.

But most importantly, the DANR Map would avoid the fragmenting of a Hispanic community of interest--and the dilution of Hispanic voting strength that is the unavoidable by-product of the Proposed Plan.

The area covered by the DANR Map, though having a 63.5% Hispanic VAP, is now represented by four out of five non-Hispanic congressmen (Mssrs Rangel, Crowley, Ackerman and Engel). But within the new district proposed by the DANR, there are some 13 Hispanic elected legislators, legislators of Dominican, Puerto Rican and Ecuadorian descent, the highest concentration of Hispanic elected officials in any existing or proposed district. This reflects a highly interactive and interdependent community, a community sharing, among other things, a common language, a common religion, and common problems that transcend geography.

These things can not be replicated, for example, by placing or maintaining a large number of Dominican residents in the District currently represented by Congressman Rangel. Those residents would have a closer sharing of interests with the Dominican, Ecuadorian and Columbian communities of Corona/Jackson Heights in respect of language and immigration-related matters, and thus form a natural community of interests.

For the community of interest concept to have any meaning, it must provide a genuine opportunity for the residents of the community to elect a representative of their choice. It is not enough to create two districts that could theoretically elect a Hispanic congressman but which in reality are unlikely to do so. The substantial number of locally elected Hispanic officials in the area covered by the DANR Map reflects a political cohesion that is empirically verifiable. The Proposed Plan does not, or is, at best, speculative in this regard.

It is no accident that the DANR Map does this. It was the product of extensive community outreach and input. On information and belief, an unusually large number of residents of the areas covered by

March 7, 2012

Page 3

the DANR Map testified before LATFOR and other community forums, and were overwhelming in their position that these areas constituted a single community of interest that should be united.

While there has not been time for the kind of in depth analysis that would be most beneficial to the Court, from a redistricting standpoint, the Proposed Plan has some obvious facial deficiencies. For example, the proposed 14<sup>th</sup> District may be contiguous, but it is respectfully, the antithesis of compactness.

In any event, even though concepts such as compactness and contiguity are legitimate considerations, they should not be extolled over more central considerations. As Chief Justice Warren said in Reynolds v. Sims, 377 U.S. 533, 562 (1964), “Legislators represent people, not...acres.” Given the mutually inconsistent nature of many of the factors a court may properly consider in the redistricting context, the DANR respectfully requests that the Court err on the side of the voice of the community. That voice says the northern Manhattan, west Bronx and Corona/ Jackson Heights areas constitute a single community of interest that should be entitled to select a single representative to speak for it in Congress.

Finally, it is ironic but significant that the Proposed Plan unsettles the interests of two groups that the Voting Rights Act is designed to protect. Specifically, as set forth in the submission of Dr. John Flateau on behalf of Manhattan Democratic County Leader Keith Wright, to which the Court’s attention is respectfully commended, the Proposed Plan actually dilutes both Black and Hispanic voting strength.

We are sure that Court does not desire such an anomalous result, and respectfully request it revise the Proposed Plan to adopt the DANR Map.

We thank the Court for its consideration of the DANR’s position.

Respectfully,

/s/ Lance Gotthoffer

Lance Gotthoffer

Becker & Poliakoff, LLP

Attorneys for Dominican American National Roundtable

*Yvette D. Clarke*  
*Member of Congress*

March 7, 2012

Magistrate Judge Roanne L. Mann  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Favors v. Cuomo*

Dear Magistrate Mann:

Thank you for allowing me the opportunity to please the Court with a submission and explanation for a proposed mapping configuration of the current NY-11<sup>th</sup> Congressional District. I understand that this is a cumbersome undertaking, however, the speed and effectiveness by which the Court is proceeding in this very important matter is admirable. Allowing for public comment to this process furthers the goals of accountability and transparency.

I respectfully submit that the Congressional District 9 (hereinafter, CD9) of the proposed map, as indicated in this Honorable Court's Order to Show Cause, dated March 5, 2012 (hereinafter, the "Proposed District"), does not preserve the core of the 11<sup>th</sup> Congressional district, maintain communities of interest, and violates the traditional redistricting principle of compactness. Ultimately, this has resulted in a violation of the United States Constitution and the Voting Rights Act of 1965. Communities of interest are fractured and diluted.

The best method to achieve Voting Rights Act of 1965, 42 U.S.C. § 1973 goals, and expand in population would be to maintain communities of interest by increasing in mass to the southeast, uniting communities including, but not limited to **Canarsie, Flatlands, Remsen-Village-Rugby, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights**. It is my goal to keep these populations whole and together to ensure that their voting power is not diluted. Keeping these communities together will ensure that these populations have a full and fair opportunity to elect candidates of their choice.

In accordance with the decision of *Shaw v. Reno*, 509 U.S. 630 (1993), race can no longer be the predominant factor in drawing political district boundaries to meet voting rights criteria. Rather, district boundaries must reflect "communities of interest". It is well settled that in redistricting, "manipulation of district lines can dilute the voting strength of politically cohesive minority group member. This may be accomplished by "cracking" a district whereas minority voters may be fragmented among several districts where a bloc-voting majority can outvote them, or by "packing" them into one or a small number of districts to minimize their influence in adjacent districts.

Further, we adopt in totality and incorporate by reference comments regarding CD9, of the Center for Law and Social Justice, dated March 6, 2012 which provides:

“This district [CD9] should honor the east-west orientation of North Brooklyn and the Southeast orientation of the Black communities in Central Brooklyn below Atlantic Avenue. The Brownsville and Flatlands areas should be returned to the CD9 district. The Clinton [sic] Hill and Fort Greene [sic] areas should be removed to CD8. The boundary between CD8 and CD9 could be straightened along Flatlands Avenue.

This is the original VRA (formerly CD11) that was created for Black voters in Brooklyn and first elected Shirley Chisholm to Congress. It has traditionally covered parts of Central Brooklyn that are heavily populated by Blacks: Flatbush, Crown Heights, Brownsville, East Flatbush, Prospect Lefferts Gardens, along with Wingate and parts of Park Slope.”

### **Preservation of the Prior District**

The Court in *Rodriguez v. Pataki*, 308 F.Supp.2d 346, 363 (2004), aff'd 543 U.S. 997, provides that preserving the "cores" of existing districts is a traditional districting principle. (citing, *Marylanders for Fair Representation. Inc. v. Schaefer*, 849 F. Supp. 1022, 1056 (D. Md. 1994) (three-judge court); *Larios v. Cox*, No. 03-CV-693, 2004 WL 299082 (N.D. Ga. Feb. 10, 2004) (three-judge court)). The proposed district does not follow this principle.

Upon a review of an overlay of the present 11<sup>th</sup> Congressional District and the Proposed 9<sup>th</sup> Congressional District, it is my observation that the Proposed District is a major departure, geographically, from the prior district. This is in direct violation of the law as interpreted in *Rodriguez*. The Proposed District expanded in mass in the following directions: 1) northwest, encapsulating all of Fort Greene and Clinton Hill; 2) completely eliminated the prior district's eastern corridor (Brownsville and East New York); 3) increased southeast minimally (Remsen Village); and 4) southwest (Midwood and Madison). In order to maintain the core of the present district and recover the loss population, the 11th congressional district must expand southeast towards Canarsie. Unless the expansion of the 11<sup>th</sup> Congressional District is achieved in the direction that follows the direction of the demographic and geographic shift of the Black Voting Age population of Brooklyn, the district would be diluted and change from a majority-minority district to merely that of an influence district. This is in violation of Section 2 of the Voting Rights Act.

Rather than maximizing upon neighborhoods that presently constituted the district, four (4) additional neighborhoods were included. These neighborhoods are as different ideologically and politically from each other as they are distant. Neighborhoods such as Brownsville and Ocean Hill were completely removed from the prior district. Where a natural progression to the east is apparent, the proposed district disregarded the adjacent proximity and geographic closeness of neighborhoods in favor of fracturing and cracking constituent groups by

neighborhood. Neighborhoods located wholly or partly within the prior district, represent a core constituency that should not be broken up.

If the prior district is altered too drastically, this will lead to voter confusion. Changes of this magnitude will affect the average voter's ability to know who represents them in government, who they should vote for and where polling sites are located. Voter confusion can and will lead to disenfranchisement.

### **Communities of Interest**

By their own admission, Common Cause asserts that the 11<sup>th</sup> congressional district has a high concentration of immigrants (particularly from the Caribbean) and that the Black population clearly shifted to the south and east. However, Your Honor's proposed map for the 9th Congressional District shifted south, but not far enough east. It shifted south to pick up the following new communities: Homecrest (1.0% NH Black VAPOP), Madison (1.6% NH Black VAPOP), Georgetown and Marine Park (10.6% NH Black VAPOP), while eliminating Park Slope, Gowanus, and Brooklyn Heights. The Proposed Map does not shift far enough eastward to embrace any parts of **Canarsie** which has a high concentration of **Caribbean immigrants** and which shares a community of interest with Prospect-Lefferts Gardens, Wingate, East Flatbush, Farragut, Erasmus, Rugby, and Remsen Village. The attached proposed map followed, to the extent feasible, the migration patterns that the United States Census documented as moving south and east so we could maintain a community of interest and recover the loss population to reach 717,707. It should be noted that immigrants from the Caribbean are largely driving the demographic transformation in Central Brooklyn.

Caribbean-Americans are the fastest growing racial minority group in Brooklyn, New York. Brooklyn presently has the largest Caribbean American population of any municipality in the nation. These findings should be deferred to in making redistricting decisions about which areas to include within congressional districts.

### **Compactness**

We preserve, for the record, our objection to the proposed district CD9 on the basis of violating the traditional redistricting principle of compactness.

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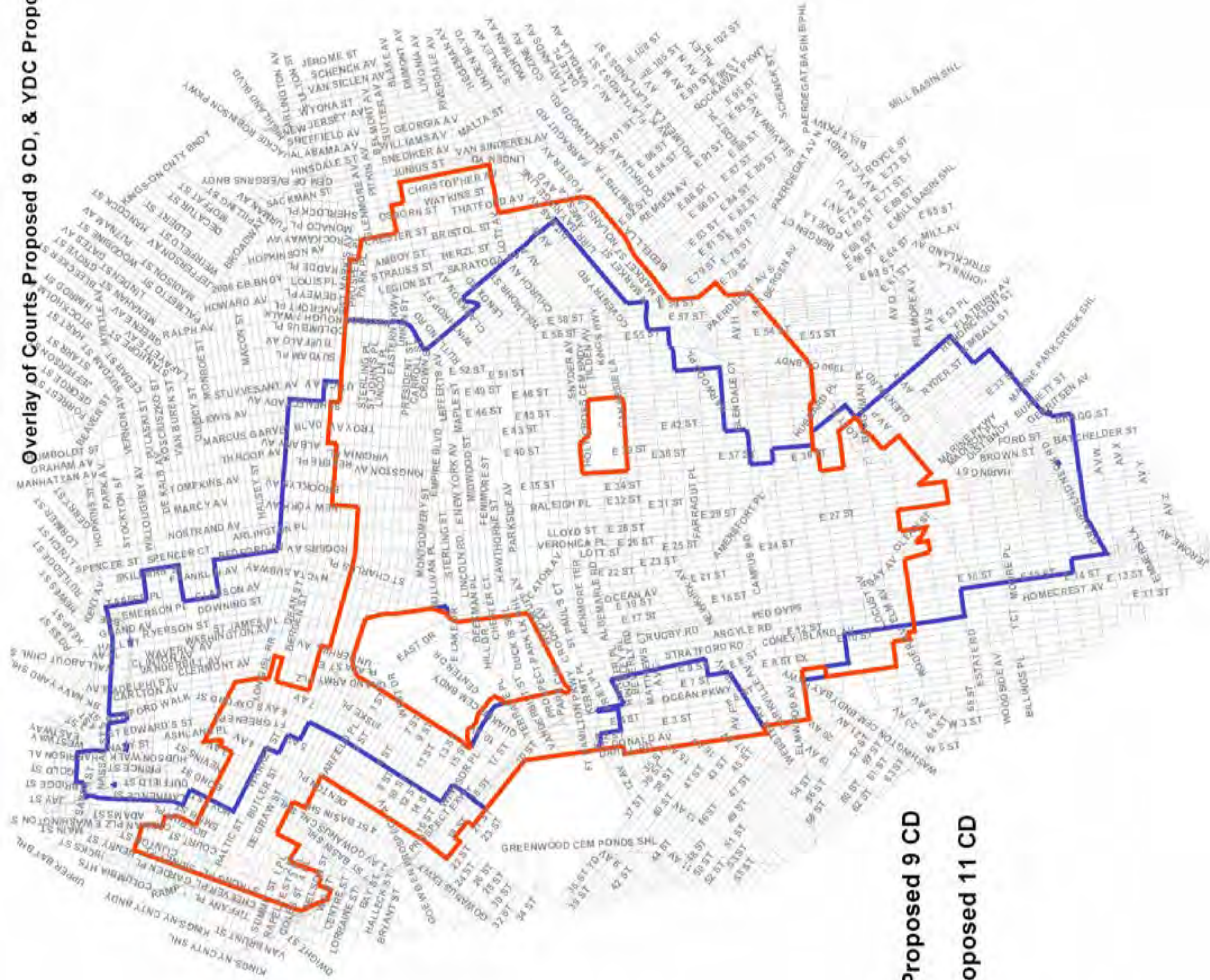
It is respectfully requested that this honorable Court reconsider its proposal for CD9 and replace it in whole, or in part, with the attached map as an adequate alternative mapping configuration for the present NY- 11<sup>th</sup> Congressional district.

Respectfully submitted,

/s/ Yvette D. Clarke

:lmw

Overlay of Courts Proposed 9 CD, & YDC Proposed 11 CD



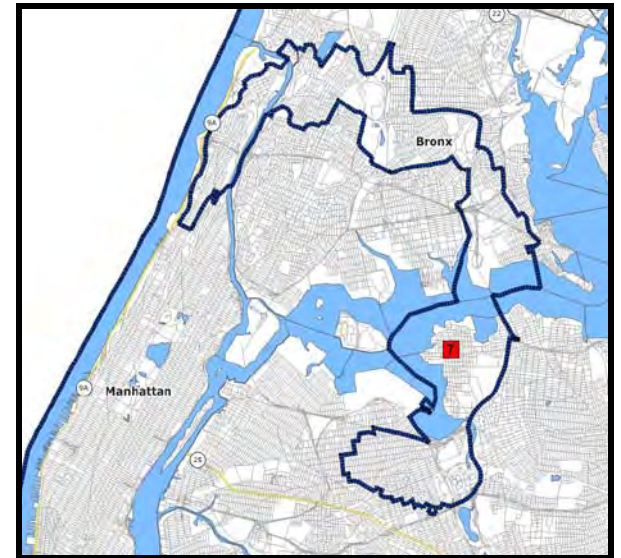
— Court Proposed 9 CD

— YDC Proposed 11 CD



# Dominican American National Roundtable

## Proposed Congressional District



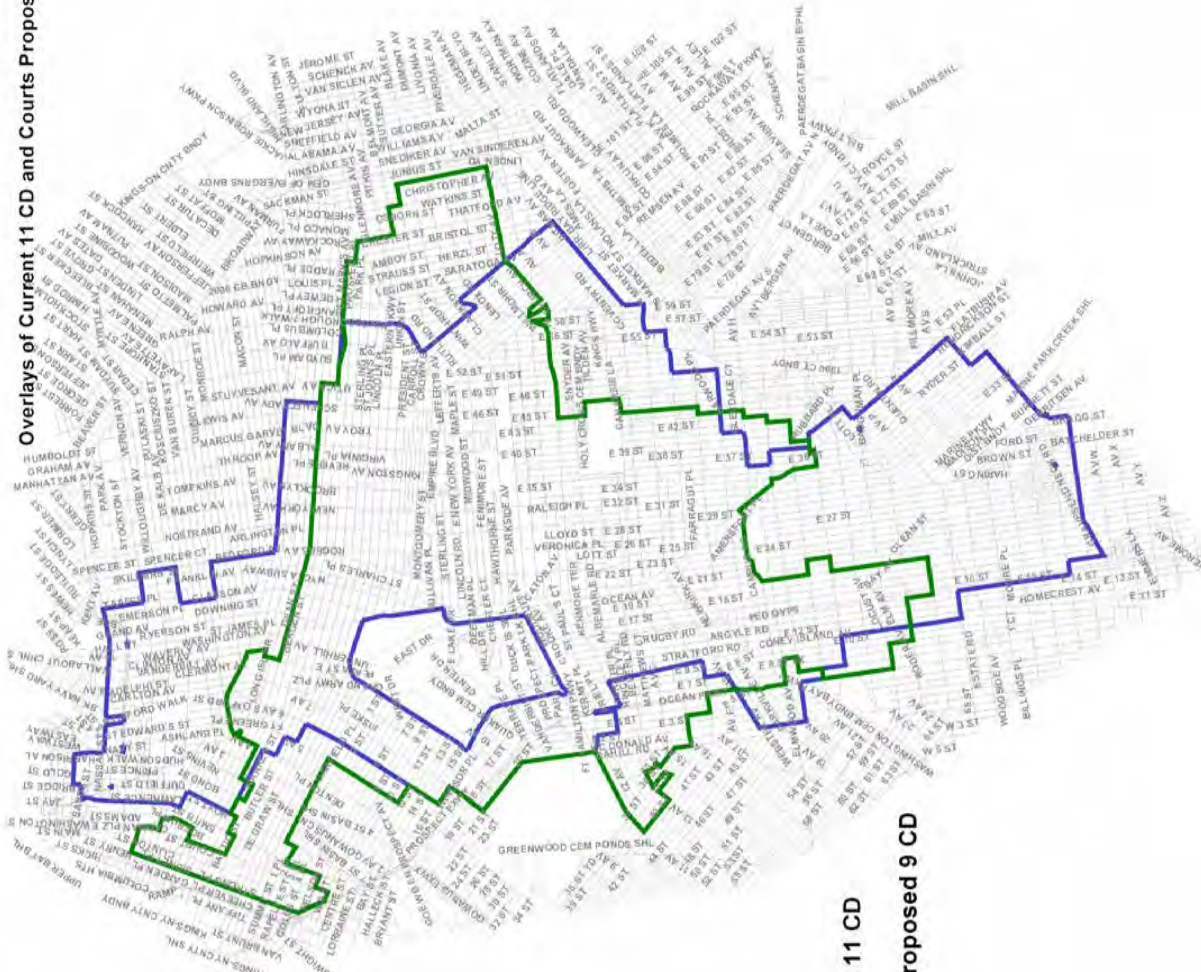
District	POPULATION	Deviation	% Deviation
7	717,706	-1	0.00%

Total Population / 2010 US Census	TOTALPOP10	LATINO10	% LATINO10	NHWHITE10	% NHWHITE10
	717,706	472,569	65.84%	104,400	14.55%
		NHBLACK10	% NHBLACK10	NHASIAN10	% NHASIAN10
		78,531	10.94%	49,576	6.91%

Voter Age Population / 2010 US Census	VAP_10	LATINOVAP1	% LATINOVAP1	NHWHITEVAP	% NHWHITEVAP
	549,893	349,202	63.50%	90,414	16.44%
		NHBLACKVAP	% NHBLACKVAP	NHASIANVAP	% NHASIANVAP
		61,539	11.19%	39,952	7.27%

Citizen Voting Age Population (CVAP) / 2005-2009 ACS	CVAPTOTAL	CVAPLATINO	% CVAPLATINO	CVAPWHITE	% CVAPWHITE
	364,977	188,398	51.62%	93,998	25.75%
		CVAPBLACK	% CVAPBLACK	CVAPASIAN	% CVAPASIAN
		63,190	17.31%	22,349	6.12%

Overlays of Current 11 CD and Courts Proposed 9 CD



Current 11 CD

Court Proposed 9 CD

Overlays of Current 11 CD, Courts Proposed 9 CD, & YDC Proposed 11 CD



**district 13  
census**

**district 13  
former district 4**

CD 13		
Total Population		
All	Pop	%
Tot	712,889	
Wh	320,347 (44.9)	
Bl	137,131 (19.2)	
Hisp	201,063 (28.2)	
Asn	39,502 (5.5)	
Nat	1,302 (0.2)	
Oth	13,524 (1.9)	
Voting Age Pop		
18+	Pop	%
Tot	539,868	
Wh	259,064 (48.0)	
Bl	101,869 (18.9)	
Hisp	140,138 (26.0)	
Asn	29,654 (5.5)	
Nat	881 (0.2)	
Oth	8,262 (1.5)	





HOUSE OF REPRESENTATIVES  
WASHINGTON, D. C. 20515

March 2, 2012

Magistrate Judge Roanne Mann  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Magistrate Mann:

I thank you for allowing me this opportunity to submit for your consideration the proposed mapping configuration for NY- 11<sup>th</sup> Congressional district (attached). My name is Yvette D. Clarke. I am a Member of the 112th Congress for the 11<sup>th</sup> Congressional District of New York. I am submitting to you copies of the proposed NY-11<sup>th</sup> Congressional District as a drawing in PDF and electronic format, with a description and commentary for your consideration and convenience.

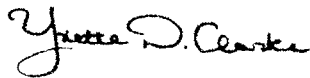
According to the United States Census Bureau, the current district is the 3rd most compact district in the nation. The 11<sup>th</sup> Congressional District has to increase by nearly 85,000 people in order to meet the population requirement of 717,707. Upon a review of 2010 Census data and all related census supporting documents, the best method to achieve Voting Rights Act of 1965, 42 U.S.C. § 1973 goals, and expand in population would be to maintain communities of interest by increasing in mass to the southwest, uniting communities including, but not limited to Canarsie, Flatlands, Remsen-Village-Rugby, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights. It is my goal to keep these populations whole and together to ensure that their voting power is not diluted. Keeping these communities together will ensure that these populations have a full and fair opportunity to elect candidates of their choice.

The present district is a majority-minority district where racial and language minorities form a majority (at least 50% or more). According to (PL 94-171), the proposed district is comprised of a total voting age population of 55% Black, 28%, White, 12% Hispanic and 5% Asian. Thus, the proposed district would remain a majority-minority district. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. In the interest of time, I direct you to see my testimony before the New York State Legislative Task Force in Demographic Research and reapportionment (LATFOR) on August 4, 2011 and September 20, 2011 respectively (Attached).

At the September 20, 2011 LATFOR public hearing, I submitted further testimony, before LATFOR to present, advocate and defend the proposed configuration for the 11th Congressional District as initially submitted on August 4, 2011. In addition to my testimony, a contingent of my state colleagues in government likewise confirmed, on the record, their public support for the proposed 11<sup>th</sup> Congressional District as introduced by me. A number of community leaders also expressed their support for the proposed 11<sup>th</sup> Congressional District, with either written or oral testimony, or both. The support for the Proposed 11<sup>th</sup> Congressional District has been overwhelmingly clear as its existence continues to permeate the community. Other civic groups who have embarked on drawing proposed versions of various New York State proposed state and federal districts have requested copies of the Proposed 11<sup>th</sup> Congressional District that I am submitting for this Honorable Court's review and consideration, to use as a guide for their own proposed lines. The map as proposed is the epitome of a congressional district that is free from political gerrymandering, discriminatory effects, is compact and contiguous, maintains communities of interest, and holds true to the bedrock tenets of the Voting Rights Act of 1965 and the Constitution of the United States of America.

I respectfully request that this Honorable Court give the attached proposed NY-11<sup>th</sup> Congressional district your utmost consideration in your deliberations. I welcome the opportunity to discuss the attached proposal in greater detail.

Very truly yours,

A handwritten signature in cursive script that reads "Yvette D. Clarke".

Yvette D. Clarke  
Member of Congress

To Whom It May Concern:

Please let me introduce myself, my Name is Christopher P. Farber, I am a lifelong resident of Herkimer County, 57 years old and I am starting my third four year term as a County wide elected Official. Before taking a county wide office I served for twenty years as a Town Justice for the Town of Little Falls while at the same time owning and operating a business for twenty five years. This was a business that I started with a hand full of tools and very little cash but with good credit. No I did not have any grants or taxpayer funding. I know the value of hard work and determination and how to live within the means of an income.

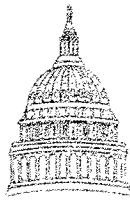
I am writing this letter to voice my opinion about the Demographic Reapportionment that your committee is working on. I admire all of those on the committee that have taken on this task and believe that you need input from those that you represent and those that our elected officials represent. I question the validity of the Census and its process. I would like to see the total numbers from our County because I have talked to several people that never received a census form or had a census worker come to their home.

Herkimer County is a county of around sixty four thousand people and has a geographical area of around one thousand four hundred and eighty square miles. We border the total west side of Oneida County. Many not for profit agencies share the population of Oneida and Herkimer County and share many projects where it makes sense. I know as a county official the sweat equity built into a countywide election and the trust bestowed upon us by our constituents. A trust that is not easily earned and is not taken lightly by any elected official. This is the same trust we have in our Congressman and the same sweat equity we have invested in him and he has invested in us.

In closing I would just like to say, we have lost equity in our homes, our investments and our land, we do not want to lose the equity we have in our trusted Congressman. Please do not split our Counties, keep us in the same congressional district and let us keep our Congressman

Respectfully,

Christopher P. Farber



HOUSE OF REPRESENTATIVES  
WASHINGTON, D. C. 20515

March 2, 2012

Magistrate Judge Roanne Mann  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Magistrate Mann:

I thank you for allowing me this opportunity to submit for your consideration the proposed mapping configuration for NY- 11<sup>th</sup> Congressional district (attached). My name is Yvette D. Clarke. I am a Member of the 112<sup>th</sup> Congress for the 11<sup>th</sup> Congressional District of New York. I am submitting to you copies of the proposed NY-11<sup>th</sup> Congressional District as a drawing in PDF and electronic format, with a description and commentary for your consideration and convenience.

According to the United States Census Bureau, the current district is the 3<sup>rd</sup> most compact district in the nation. The 11<sup>th</sup> Congressional District has to increase by nearly 85,000 people in order to meet the population requirement of 717,707. Upon a review of 2010 Census data and all related census supporting documents, the best method to achieve Voting Rights Act of 1965, 42 U.S.C. § 1973 goals, and expand in population would be to maintain communities of interest by increasing in mass to the southwest, uniting communities including, but not limited to Canarsie, Flatlands, Remsen-Village-Rugby, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights. It is my goal to keep these populations whole and together to ensure that their voting power is not diluted. Keeping these communities together will ensure that these populations have a full and fair opportunity to elect candidates of their choice.

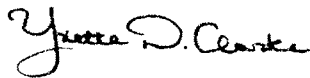
The present district is a majority-minority district where racial and language minorities form a majority (at least 50% or more). According to (PL 94-171), the proposed district is comprised of a total voting age population of 55% Black, 28%, White, 12% Hispanic and 5% Asian. Thus, the proposed district would remain a majority-minority district. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. In the interest of time, I direct you to see my testimony before the New York State Legislative Task Force in Demographic Research and reapportionment (LATFOR) on August 4, 2011 and September 20, 2011 respectively (Attached).



At the September 20, 2011 LATFOR public hearing, I submitted further testimony, before LATFOR to present, advocate and defend the proposed configuration for the 11th Congressional District as initially submitted on August 4, 2011. In addition to my testimony, a contingent of my state colleagues in government likewise confirmed, on the record, their public support for the proposed 11<sup>th</sup> Congressional District as introduced by me. A number of community leaders also expressed their support for the proposed 11<sup>th</sup> Congressional District, with either written or oral testimony, or both. The support for the Proposed 11<sup>th</sup> Congressional District has been overwhelmingly clear as its existence continues to permeate the community. Other civic groups who have embarked on drawing proposed versions of various New York State proposed state and federal districts have requested copies of the Proposed 11<sup>th</sup> Congressional District that I am submitting for this Honorable Court's review and consideration, to use as a guide for their own proposed lines. The map as proposed is the epitome of a congressional district that is free from political gerrymandering, discriminatory effects, is compact and contiguous, maintains communities of interest, and holds true to the bedrock tenets of the Voting Rights Act of 1965 and the Constitution of the United States of America.

I respectfully request that this Honorable Court give the attached proposed NY-11<sup>th</sup> Congressional district your utmost consideration in your deliberations. I welcome the opportunity to discuss the attached proposal in greater detail.

Very truly yours,

A handwritten signature in cursive script that reads "Yvette D. Clarke".

Yvette D. Clarke  
Member of Congress

**August 4, 2011 Testimony of Rep. Yvette D. Clarke**

To: Assemblyman James McEneny, State Senator Michael Nozzolio, and to the members of the New York State Legislative Task Force in Demographic Research and Reapportionment (LATFOR). I would also like to give a special greeting and acknowledgement to our State Senator the Hon. Martin Dilan for his leadership.

Good Morning. I thank you for providing me this opportunity to testify, and to submit for your consideration a proposed map for the 11<sup>th</sup> Congressional district of NY. My name is Yvette D. Clarke. I am a Member of 112<sup>th</sup> session of Congress for the 11<sup>th</sup> Congressional District. My testimony before you today is an abbreviated version of the documents in your possession.

The proposed 11<sup>th</sup> Congressional District adheres to all Constitutional and Voting Rights Act redistricting guidelines: this district meets the requirement of equal population, compactness and contiguity, and complies with all provisions of the Voting Rights Act.

The proposed district substantially maintains the same geographic and demographic configuration as the current district, with the exception of it being increased in size by 85,219 persons, changing slightly to achieve population equality with the other districts in New York State.

This district is comprised of a total voting age population of 55% Black, 28% White, 12% Hispanic and 5% Asian. So this district would remain a majority-minority district.

According to the United States Census Bureau, the current district is the 3<sup>rd</sup> most compact district in the nation. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. This expansion into South-Central Brooklyn neighborhoods increases the population to meet the 717,707 requirement.

The proposed district is defined by shared interest, such as social, economic, cultural, linguistic, and other factors that indicate communities of interest.

The current district includes many sections of the, historic, 12<sup>th</sup> Congressional District which was originally represented by the Hon. Shirley Chisholm (the first African-American female elected to Congress). The proposed district adheres to Voting Rights Act principles for redistricting. This district is covered by Section 5 of the Voting Rights Act.

Thank you for allowing me to address this body today. As you deliberate, I urge that you give your most utmost consideration to this proposed map for the 11<sup>th</sup> Congressional District of New York. If there are any questions or comments concerning my testimony please feel free to contact me via email at [clarkeforcongress@gmail.com](mailto:clarkeforcongress@gmail.com) or at telephone number (718) 940-2008.

**September 20, 2011 Testimony of Rep. Yvette D. Clarke**

To: Assemblyman James McEneny, State Senator Michael Nozzolio, and to the members of the New York State Legislative Task Force in Demographic Research and Reapportionment (LATFOR). I would also like to give a special greeting and acknowledgement to our State Senator the Hon. Martin Dilan for his leadership.

Good Morning. My name is Yvette D. Clarke. I am a Member of 112<sup>th</sup> session of Congress for the 11<sup>th</sup> Congressional District.

I was quite pleased to be able to represent the 11th Congressional District recently at the August 4, 2011, New York State Legislative Task Force on Demographic Research and Reapportionment (LATFOR) redistricting hearing in Albany. At that hearing I introduced a proposed map for a newly created "11th" Congressional District, which as you are aware, I currently represent as a Member of Congress. I am resubmitting, for your consideration a hard copy of the proposed map, as well as, supplemental material containing more demographic information (the proposed District with neighborhood boundaries, the proposed district with the current 11th congressional district overlay and supporting documentation). Please note that upon your request, I can provide you with electronic versions of these maps and an assignment list.

Since the time of my initial testimony, a number of my constituents, colleagues and friends have expressed their support for the proposed map. I suspect that you will hear from a delegation of them today.

Please keep in mind the following:

The proposed 11<sup>th</sup> Congressional District adheres to all Constitutional and Voting Rights Act redistricting guidelines: this district meets the requirement of equal population, compactness and contiguity, and complies with all provisions of the Voting Rights Act.

The proposed district substantially maintains the same geographic and demographic configuration as the current district, with the exception of it being increased in size by 85,219 persons, changing slightly to achieve population equality with the other districts in New York State.

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According to the United States Census Bureau, the current district is the 3<sup>rd</sup> most compact district in the nation. The proposed district adheres largely to its present boundaries and still maintains its highly compact nature. This expansion into South-Central Brooklyn neighborhoods increases the population to meet the 717,707 requirement.

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Thank you for allowing me to address this body again today. As you deliberate, I urge that you give your most utmost consideration to this proposed map for the 11<sup>th</sup> Congressional District of New York. If there are any questions or comments concerning my testimony please feel free to contact me via email at [clarkeforcongress@gmail.com](mailto:clarkeforcongress@gmail.com) or at telephone number (718) 940-2008.



BY ECF

March 2, 2012

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court For the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Favors v. Cuomo, No. 1:11-cv-05632-DLI-RR-GEL-RLM (E.D.N.Y.)

Dear Judge Mann:

Pursuant to the Court's scheduling order, Common Cause/New York respectfully submits this letter, on an *amicus* basis, to (a) explain the procedure and criteria we used in drawing the Common Cause Congressional Reform Map (the "Common Cause Reform Map"); (b) comment on the maps submitted by the parties; and (c) explain why the Court should deny the request to include "incumbent protection" as a factor to be considered by the Special Master.

**PROCEDURE AND CRITERIA USED TO DRAW THE COMMON CAUSE REFORM MAP; COMMENTS ON OTHERS' MAPS**

General Procedure

In drawing the Common Cause Reform Map, we started with a base map that included only the geography of the State (cities, towns, villages, school districts, streets, parks, etc.) and the relevant census data. Accordingly, our districts are not drawn as adjustments to the existing districts.

We identified the criteria that we believed should guide our drawing of non-partisan districts and discussed those criteria with our advisors, Professor Gerald Benjamin of SUNY-New Paltz, Professor James Gardner, University of Buffalo Law School, and Kent Gardner, PhD, Center for Governmental Research, Rochester, modifying or explaining the final criteria as suggested. The criteria are discussed below.

In addition to studying the demographics of each area of the State, we reviewed testimony from LATFOR hearings and had discussions with activists and community groups in Rochester, Buffalo, the Southern Tier, Syracuse, Long Island, the Hudson Valley, and various parts of New York City. We are grateful for the input and assistance we received from our academic advisers and the interested activists and community groups who assisted us in identifying and reflecting the relevant communities of interest in the Common Cause Reform Map.

We used Arc-GIS with the Caliper Corporation's "Maptitude for Redistricting" add-on as our map-drawing software. This is the same software used by LATFOR in its map-

drawing process. Census blocks are the basic unit used by this software, and basic demographic data obtained from the U.S. Census comes pre-loaded with the Maptitude software, that is, overall population, voting age population, and breakdowns by race/ethnicity. In addition, we added other relevant socio-economic data from the U.S. Census' "American Community Survey 2005-2009", as discussed below.

With this data in hand, we applied the criteria discussed below, began mapping at the eastern end of Long Island, and worked our way west and north through the State. Once an initial draft map was completed, we reviewed it with our academic advisers and asked for feedback from some community groups. We adjusted the maps based on the comments and suggestions we received. Common Cause/NY, and not its advisers, is solely responsible for the Reform Map.

### Criteria Used

In its February 28, 2012 order appointing this Court and Special Master Persily to act in this matter (the "Referral Order"), the three-judge panel set out four criteria for the Court to adhere to in preparing the plan. Referral Order, ¶2. The Common Cause Reform Map was drawn with those very same criteria in mind, and thus fully complies with those criteria. And just as the concept of "incumbency protection" is absent from the Referral Order, Common Cause/NY drew the Reform Map on an incumbent-blind basis.

The Common Cause Reform Guide submitted with the Reform Map on February 28, 2012 (see [pub-commoncauseny-reformplanguide.pdf](#)) summarizes the salient rationale used to draw each Reform District. We respectfully refer the Court to that submission, but we highlight below some of the more significant points we considered, and cite several examples that demonstrate the soundness of the Common Cause/NY approach and illustrate the shortcomings of alternatives submitted by the parties.

#### 1. Federal Constitutional Requirements

The first and overriding factor in setting congressional district lines is to follow the "one person, one vote" standard by achieving equal population among all of the districts, as required by Article I, Sec. 2 of the U.S. Constitution. In *Westbury v. Sanders*, the U.S. Supreme Court interpreted that constitutional standard to require achieving absolute equality in size of districts "as nearly as is practicable." 376 U.S. 1, 7-8 (1964). We have endeavored to comply with this standard, with the districts in the Common Cause Reform Map deviating in size by no more than seventeen persons, with most districts being within ten persons of the ideal size.

#### 2. Compliance with the Voting Rights Act

##### *North Manhattan/Bronx*

The Common Cause Reform Map seeks to provide the minority communities of the Bronx, Manhattan and North Queens with a fair opportunity to elect the representatives of their choosing. We do this by drawing three majority Hispanic districts, the Common Cause Reform Districts 5, 15 and 14. Drawing districts on an incumbent-blind basis facilitates the ability of communities, including minority communities, to choose their own

representatives. None of the plans submitted by the parties before the Court draws three Hispanic majority districts in this area of New York City.

Common Cause Reform District 15 is also unique in that it substantially increases the proportion of non-Hispanic black voting age population ("VAP") compared to the current NY 15. Following is a comparison of the districts drawn that are analogous to current NY 15 in different plans.

	<b>POP</b>	<b>DEV</b>	<b>%NHBlkVAP</b>	<b>%HspVAP</b>
<b>Common Cause NY 15</b>	717,711	4	36.5%	52.1%
<b>Senate R's NY 14</b>	717,708	1	25.9%	54.6%
<b>Assembly D's NY 15</b>	717,708	1	25.7%	48.4%
<b>UNITY Plan NY 15</b>	717,706	-1	26.5%	49.4%
<b>Current NY 15</b>	638,873	-77,834	26.5%	43.8%

*Congressional District 12*

Both the Common Cause Reform Map and the Unity Plan join the demographically similar communities of Manhattan's Chinatown and Brooklyn's Sunset Park in the same Congressional District 12; the Assembly Democratic Plan does likewise, to some degree. This continues the pairing that exists in the current Congressional District 12. The demographic similarities of these two neighborhoods, which have significant Asian populations, was a topic considered and accepted by the Court in *Diaz v. Silver*, 978 F. Supp. 96, 101-102 (E.D.N.Y. 1997). Nevertheless, the Senate Republican Plan places Manhattan's Chinatown in its proposed CD 07, while Sunset Park remains in its proposed CD 12.

*Queens*

While Queens is not subject to Section 5 of the Voting Rights Act, we believe it instructive to examine how the various proposed maps address the significant issue of representation opportunities for the growing Asian-American minority. Neither party plan unites the demographically similar Asian communities of Flushing and Elmhurst in Queens. The Republican map even goes so far as to split the individual communities of Flushing and Elmhurst between two congressional districts, with concomitant dilution of the ability of this community to influence elections. We believe that this is in contradiction to the Court's criteria of keeping communities of interest together where possible. Both the Unity Plan and the Common Cause Reform Map keep Elmhurst and Flushing together in a single congressional district which is over 35% Asian VAP.

3. Public Interest and Traditional Redistricting Criteria

Among the criteria that the three-judge panel set forth in the Referral Order was what is regarded as the traditional redistricting criteria: the districts "shall be compact, contiguous, respect political subdivisions, and preserve communities of interest." Referral Order, ¶2. The Common Cause Reform Map most amply satisfies this directive.

In drawing the Reform Map, we prioritized the concept of “communities of interest.” We define a community of interest as “a local population with shared socio-economic characteristics that would benefit from unified representation by a single legislator.” These shared characteristics may include ethnicity, education, median household income, language, religion, occupations/industry, transportation and commuting patterns, housing patterns, shopping patterns, population age, family structures, and geography.

Common Cause/NY identified these factors while drawing its lines by layering the mapping software with socio-economic data from the aforementioned 2005-2009 American Community Survey. This data included median household income, occupation (data grouped into three categories – “white collar,” “blue collar,” and “service sector”), percentage of homeowners, percentage of public transit commuters, percentage of residents with a college degree, percentage of senior citizens, percentage of children, and the percentage of foreign born residents in order to identify concentrations of residents with common characteristics and interests.

Within New York City, this methodology for respecting communities of interest often translates into respect for neighborhood boundaries, keeping distinct local communities together in one district so they can effectively organize and engage in civic life. In upstate New York, it often translates into orienting districts around distinct regions like the North Country, Mohawk Valley, Rochester Metropolitan Area, Southern Tier, or Capitol Region.

If one draws with communities of interest as a top priority, the traditional redistricting factors of compactness and contiguity naturally follow. Looking at the two most commonly used statistical measures of compactness, the “Polsby-Popper” and “Reock” scores (as used by the Arizona Independent Redistricting Commission (<http://www.azredistricting.org/default.asp>), the Common Cause Reform Plan has a higher mean measure of compactness than either the Senate Republicans’ or Assembly Democrats’ proposals.

	Mean "Reock" Measure of Compactness	Mean "Polsby-Popper" Measure of Compactness
Common Cause Plan	0.40	0.33
Assembly Dems Plan	0.39	0.29
Senate Reps Plan	0.37	0.25

Looking at the issue of respecting political subdivisions, we made a conscious decision in upstate New York to prioritize communities of interest (as defined above) over a more rigid criterion to respect county borders. This is why the Common Cause Reform Plan divides more counties (18 of the 53 that can fit in a single district) than either the Senate Republican (9 of 53) or Assembly Democratic (10 of 53) proposals. For example, Reform District 20 crosses into parts of both Montgomery and Fulton counties in order to add the small industrial cities of Amsterdam, Johnstown, and Gloversville to the Capitol Region district that includes Albany, Troy, and Schenectady. This was done because of



observed socio-economic commonalities between these cities. Similarly, Reform District 23 divides several counties in order to include the cities of Utica, Rome, and the rest of the Mohawk Valley region in a district with Syracuse. Likewise, Reform District 27 crosses into Niagara County in order to include the city of Niagara Falls in the same district as the city of Buffalo.

With regard to respecting the municipal borders of towns and cities, Common Cause/NY's employment of the "communities of interest" priority understandably resulted in very few instances of splitting a town or city between districts, and in virtually every case only for the purpose of balancing populations.

### **THE REQUEST TO INSERT AN "INCUMBENCY PROTECTION" FACTOR INTO THE COURT'S REDISTRICTING CRITERIA SHOULD BE REJECTED**

At the request of counsel for respective legislative majorities, the Referral Order was amended to grant the Court the discretion to consider redistricting factors other than those enumerated in the order. Referral Order, ¶13. When it comes to adding a factor to advantage incumbents, the Court should decline to exercise that discretion.

First, there is no requirement that redistricting include such a factor. The Court will look in vain for any language in the State Constitution, statutes, or caselaw that requires a court to take into account the residence of an incumbent officeholder when drawing district lines. The submissions of the majorities effectively concede this point since their own interpretation of the cases they cite is that, at best, such consideration is permissible under certain circumstances.

Second, those circumstances are not present here, so the cases cited by the officeholders are inapposite. Interpreted most generously for the majorities, those cases suggest, often in *dicta*, that a legislatively-drawn plan need not be invalidated because it factors in incumbency. The instant matter has been dropped in the Court's lap precisely because the Legislature has *not* enacted a plan. The Court thus has a fresh slate with which to work, and the case most directly on point factually found it inappropriate for a court to consider incumbency:

We also recognize that in the process of adopting reapportionment plans, the courts are "forbidden to take into account the purely political considerations that might be appropriate for legislative bodies." *Wyche v. Madison Parish Police Jury*, 635 F.2d 1151, 1160 (5<sup>th</sup> Cir. 1981). Thus, "many factors, such as protection of incumbents, that are appropriate in the legislative development of an apportionment plan have no place in a plan formulated by the courts." *Wyche v. Madison Parish Police Jury*, 769 F.2d 265, 268 (5<sup>th</sup> Cir.) (*per curiam*).

*Larios v. Cox*, 306 F. Supp. 1214, 1218 (N.D. Ga 2004) (footnote omitted) (emphasis added).

Third, even in those cases where incumbency was not viewed as a reason to invalidate a legislatively-enacted plan, the language is hardly the sweeping endorsement advanced

by the majorities. The Supreme Court said precious little to explain its observation in *Bush v. Vera*, 517 U.S. 952, 964 (1996), but in weighing the point the Court appeared most focused on the benefits of avoiding putting two incumbents in the same district, a much narrower proposition than that proffered by the majorities here.

Fourth, incumbency protection is unfair to voters and challengers and would dilute the weight of the other factors listed in the Referral Order. The majorities want this factor considered – indeed, given “considerable weight” (Assembly Majority Br., at 8) – because it will by definition advantage incumbents and, therefore, disadvantage challengers. If such a factor were to be fairly considered by the Special Master and the Court, it would, as a matter of logic, result in some (or perhaps many) lines being altered in order to better protect incumbents. Why else have such a factor if it were not intended to prompt such results? Consequences would flow from this. When incumbents are stronger, those who would challenge them face a more difficult challenge. And lines that would have been drawn based on fealty to the factors enumerated in the Referral Order would be different -- and the relative weight of those factors accordingly diminished, if not trumped entirely.

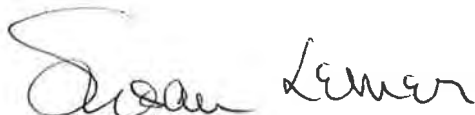
Finally, it is difficult to square the majorities’ arguments regarding the virtues of incumbency protection with the utter absence of any mention of that factor in the LATFOR website and public pronouncements of the task force. Indeed, the FAQ intended to educate the public about the redistricting process purports to identify the factors that will be considered by the legislature, yet says nothing about the factor now so urgently pressed by the majorities. See <http://www.latfor.state.ny.us/faqs/>

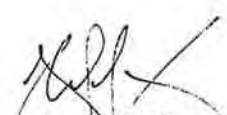
Common Cause/NY understands that many incumbents may wish to persuade voters of the wisdom of returning them to Congress, where seniority and leadership positions may yield significant benefits for their districts. Such an argument can and often is made in the context of campaigns, where the merits of such an argument can be weighed and either accepted or rejected by the voters at election time. We vigorously dispute the notion that the benefits of incumbency are so self-evident that incumbents should be aided by a thumb on the scale at the time of reapportionment.

\* \* \*

For the reasons set forth above and in the Reform Guide previously submitted, Common Cause/NY respectfully submits that the Common Cause Reform Map offers the Court and the Special Master a sound basis on which to approach its appointed task and, further, that the Court should reject the majorities’ request to require the Special Master to include incumbency protection as a factor in drawing the congressional map.

Respectfully submitted,

  
Susan Lerner  
Executive Director  
Common Cause/New York

  
John P. Coffey  
Board Member  
Common Cause/New York

**Testimony of the Honorable Drew Fixell  
Mayor, Village of Tarrytown  
March 5, 2011**

My name is Drew Fixell. I am the Mayor of Tarrytown, an incorporated Village within the Town of Greenburgh. I am also the current President of the Westchester Municipal Officials Association, although I am not representing the Association today.

Greenburgh is the second largest municipality in Westchester County, with a population of almost 90,000. For a decade, almost all of Greenburgh – with the small exception of a narrow strip along the Hudson River -- has been contained within the 18<sup>th</sup> Congressional District, which draws the great majority of its population from Westchester.

This pattern of representation has served the people of Greenburgh well, because it reflects the many common interests shared by Greenburgh and the larger Westchester community: similar demographic characteristics, common public institutions, similar land use and planning challenges, and reliance on and relationship with the same transportation infrastructure, especially the 287 corridor and the metro-North commuter line.

For these reasons, I strongly support the Assembly majority proposal, which would preserve current lines of representation in Greenburgh, without any change.

I strongly oppose the Senate majority proposal, which would extract Greenburgh entirely from Westchester and place it in a district with populations principally drawn from the Bronx and Rockland Counties.

Especially upsetting about the Senate majority proposal is that it does not appear to satisfy any legitimate public objective. The map that results from dislocating Greenburgh out of Westchester is: (1) substantially less compact, held together by a paper thin corridor in Yonkers; and (2) entails a wholly unnecessary swap of 160,000 residents of Yonkers and Greenburgh from one Congressional District to another. Simply reversing this swap would re-establish the traditional representation that both of these communities have long enjoyed.

Moreover, the shifting of Greenburgh out of Westchester ignores the very real and unique interests of Westchester with regards to the Tappan Zee Bridge and the I-287 corridor. While Rockland and Bronx residents primarily relate to the bridge and the corridor as merely the means to accomplish their commutes to work, Westchester and especially Greenburgh residents, have a direct and extraordinary interest in the secondary impacts of this enormous piece of public infrastructure. By making Greenburgh, in effect, a minor appendage in a non-Westchester district, the interests of Greenburgh residents in this regard will, at best, be marginalized.

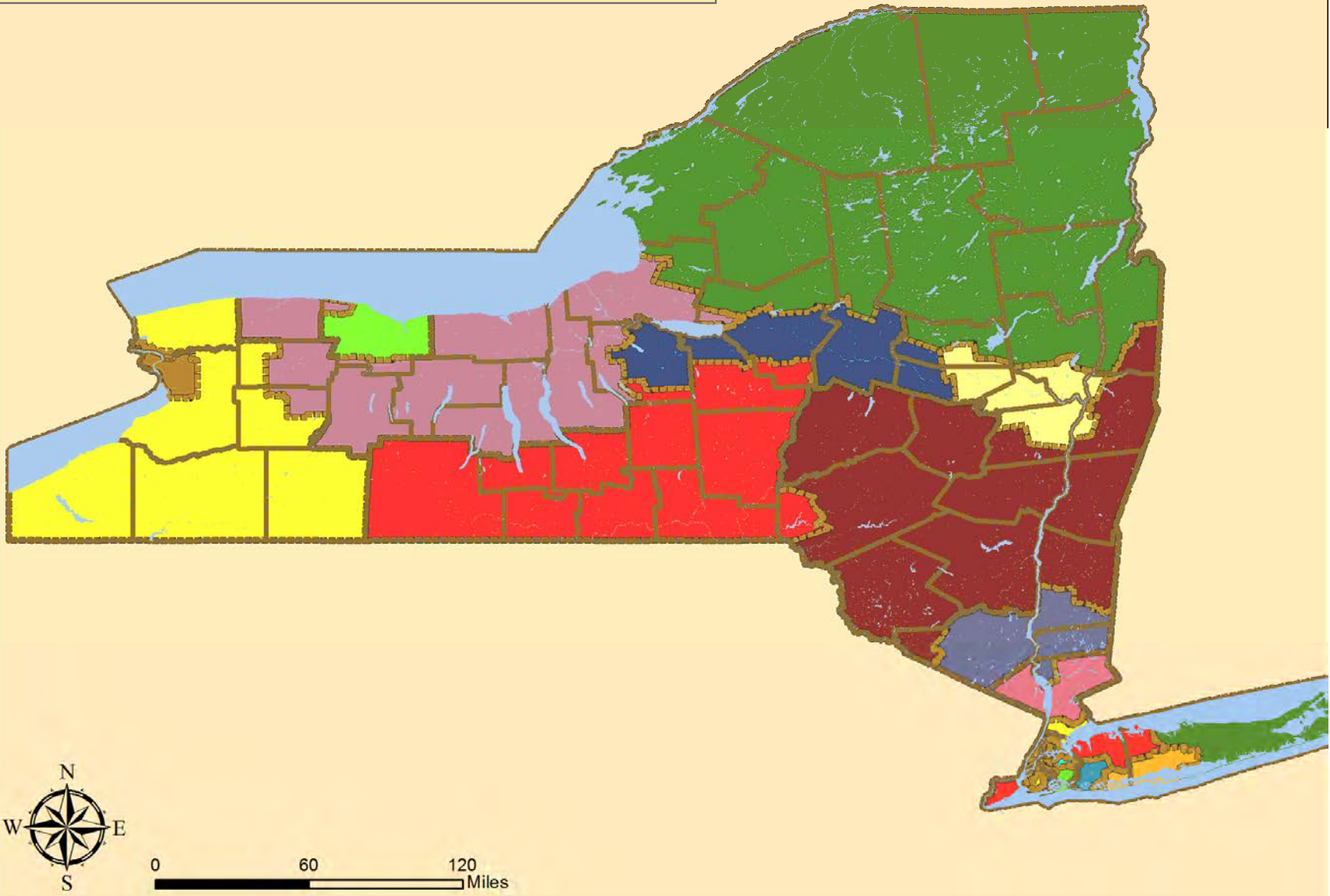
While a very minor split of Greenburgh, as exists presently, may be needed in order to achieve larger objectives (and may even provide some small benefit to communities that enjoy representation from two members of Congress), there is no rhyme or reason to the Senate majority plan.

I recognize that you have many difficult considerations to weigh. But this particular issue is a simple one. Please maintain patterns of representation that are important to us by keeping as much of Greenburgh as possible in a Westchester-based district.

Thank you.

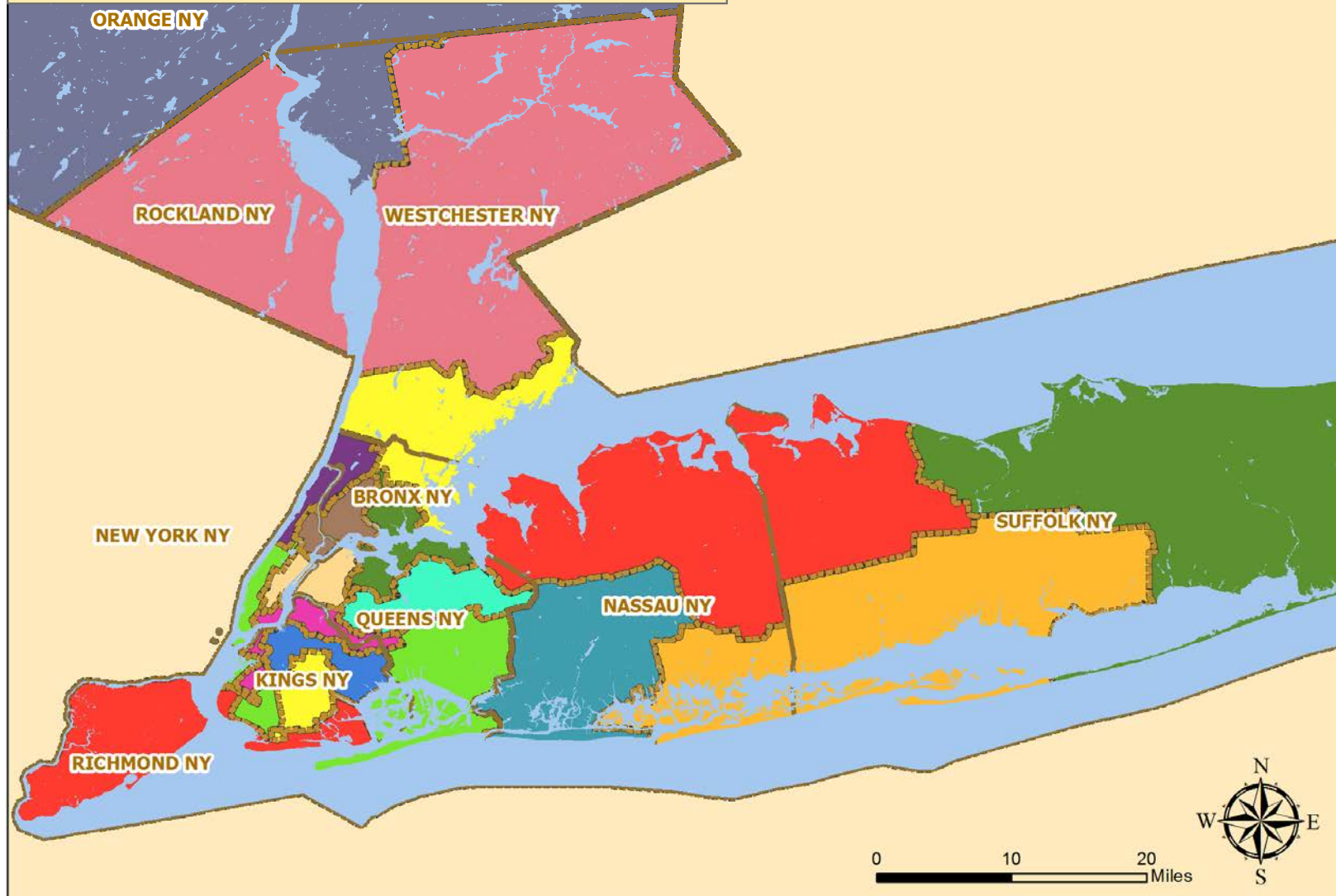
Brian Paul, Common Cause/NY, 12/03/11

# Common Cause Reform Plan NY State Congress



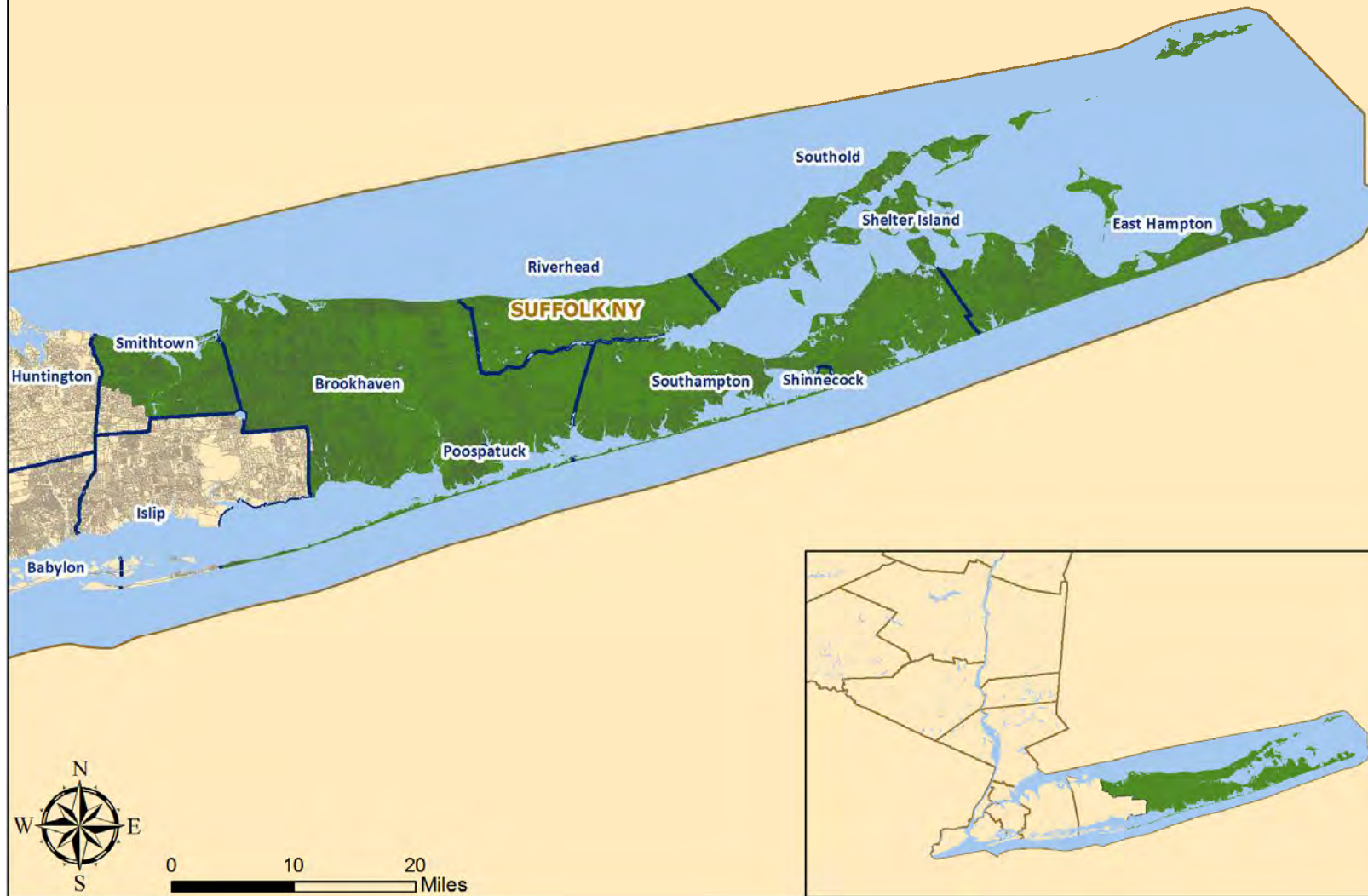
# Common Cause Reform Plan NY State Congress

Brian Paul, Common Cause/NY, 12/03/11



Brian Paul, Common Cause/NY, 12/03/11

# Common Cause Reform Plan Congressional District 1



## DISTRICT 1 – SUFFOLK COUNTY

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
1	717,711	549,589	80.1%	4.2%	3.3%	11.1%

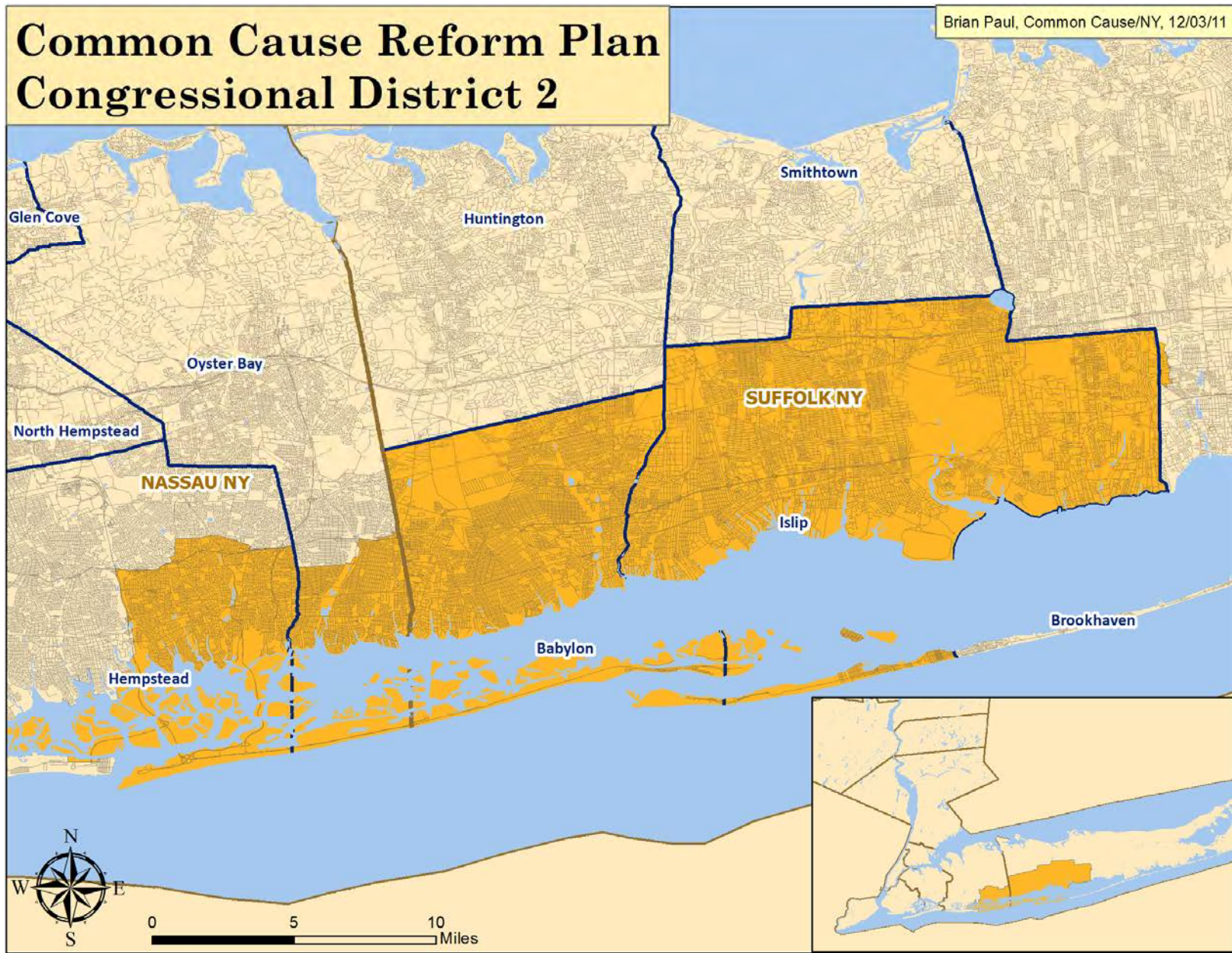
### *Description and explanation*

- CC Reform NY 1 occupies the eastern half of Suffolk County, including most of Smithtown, Brookhaven, Riverhead, and the Hamptons and North Fork. Eastern Suffolk is a rural community of interest, relatively dependent on agriculture and tourism compared to the rest of suburban Long Island. Although Smithtown and western Brookhaven are more suburban and less rural, they're a better fit for the district than the denser areas of Islip.

### *Major Demographic Changes:*

- Suffolk experienced a concentrated growth of over 5% from 2000 to 2010 in the county's minority communities. While the non-Hispanic White VAP of Suffolk actually fell by 0.7%, the non-Hispanic Black VAP grew by 18.4% and Hispanic VAP by an explosive 67.7%.
  - o Within the eastern Long Island area of CC Reform NY 1, the Hispanic VAP is now 11.1%
- A detailed analysis of the demographics of Suffolk, including illustrative maps and a discussion of some of the assumptions and factors shaping the districts drawn in the Common Cause Reform Map can be found on Common Cause/NY's redistricting blog, [Mapping Democracy](#).





## DISTRICT 2 – CENTRAL SOUTH SHORE

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
2	717,714	543,625	69.2%	8.6%	2.8%	18.2%

### *Description and explanation*

- CC Reform NY 2 is a south shore district that includes Babylon, Islip and the oceanfront areas of Oyster Bay and southeast Hempstead.
  - o Throughout Long Island, there is a clear demographic contrast between the North Shore, where households in most areas make over \$75,000 and many over \$125,000, and the South Shore where the population is mostly middle and working-class, and much more ethnically/racially diverse. The contrast between North Shore and South Shore is most evident in western Suffolk. Babylon-Islip also has markedly lower rates of homeownership, education, and more blue-collar and service-sector workers than the North Shore. In both Nassau and Suffolk, the South Shore is denser and more heavily developed than the North Shore. In addition, communities in the region identify according to North Shore vs. South Shore.

### *Major Demographic Changes:*

- Minority communities in Babylon-Islip continue to grow. Suffolk is now almost 22% Black and Hispanic, up from just 16% ten years ago. Within the area of central Babylon and Islip, the voting age population is now majority-minority.
- A detailed analysis of the demographics of Suffolk, including illustrative maps and a discussion of some of the assumptions and factors shaping the districts drawn in the Common Cause Reform Map can be found on Common Cause/NY's redistricting blog, [Mapping Democracy](#).



## DISTRICT 3 – NORTH SHORE

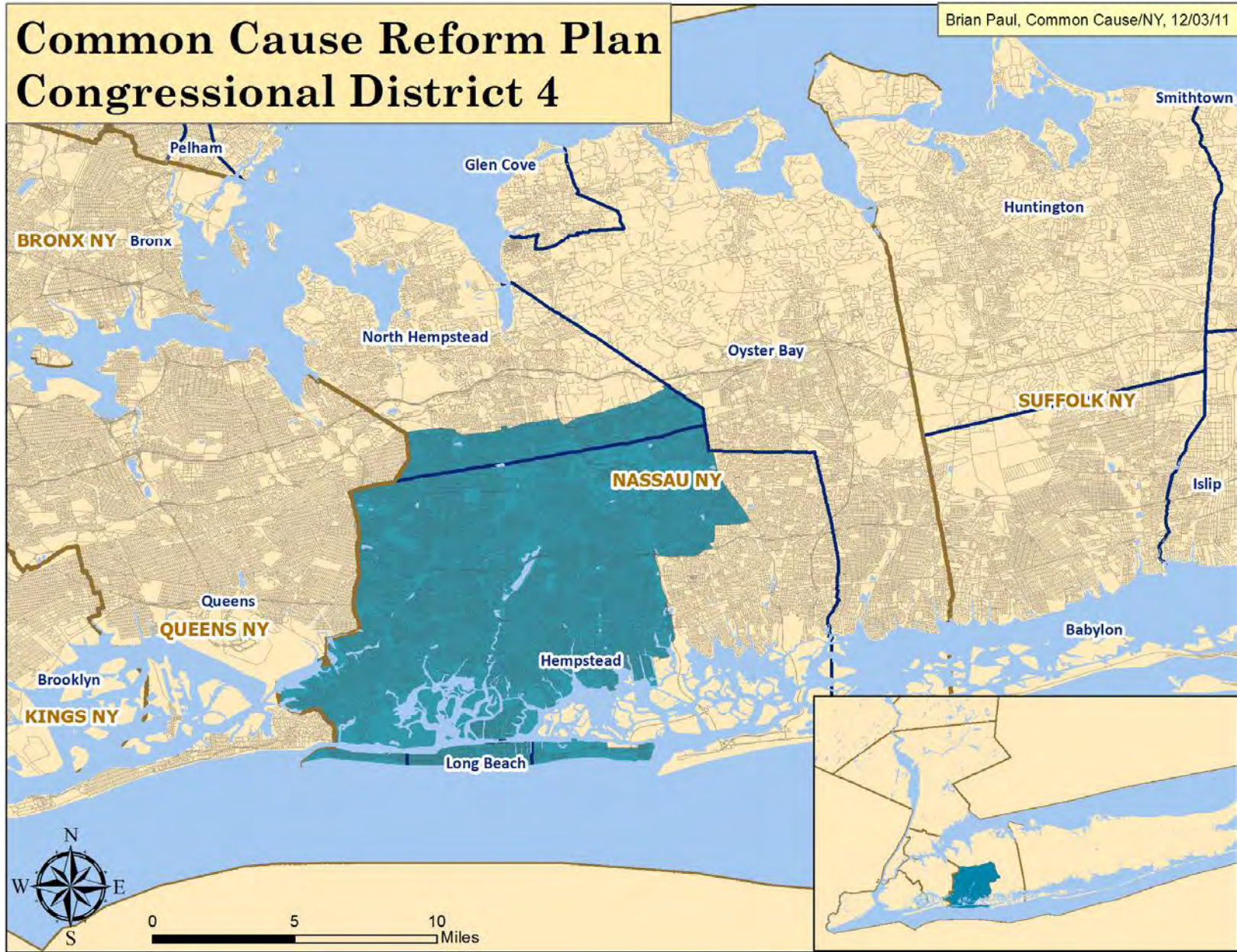
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
3	717,704	549,756	77.2%	2.6%	10.1%	8.9%

### *Description and explanation*

- CC Reform NY 3 is a north shore Long Island district stretching from Huntington through Oyster Bay, Glen Cove, North Hempstead, and across the New York City border into the suburban Little Neck area of Queens.
  - o The North Shore and South Shore are distinct communities of interest, varying in wealth, education, homeownership and types of occupation. Long Islanders also often self-identify as North Shore vs. South Shore.
- Due to the larger size of the new Congressional districts (717,707) four districts now fit almost perfectly within Long Island. Only about 38,000 residents of Queens have to be added to a Long Island-based district for the population math to work.
  - o The Little Neck-Douglaston area is the ideal place to cross the City border to pick up population. Separated from the rest of Queens by Alley Pond Park, these suburban neighborhoods are in many ways more closely connected to the adjacent Great Neck area of Nassau than to the rest of New York City.

### *Major Demographic Changes:*

- Within Nassau, Asian voting-age population increased by a remarkable 68% since 2000 and Asians now account for 7.4% of the voting age population of the county. The growth of the Asian community in North Hempstead and Oyster Bay is on track to be an important factor in 2020 redistricting. A more detailed discussion of Nassau’s demographics can be found [by clicking here](#).



## DISTRICT 4 – SOUTHWEST NASSAU

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
4	717,713	552,257	56.3%	17.4%	6.3%	18.3%

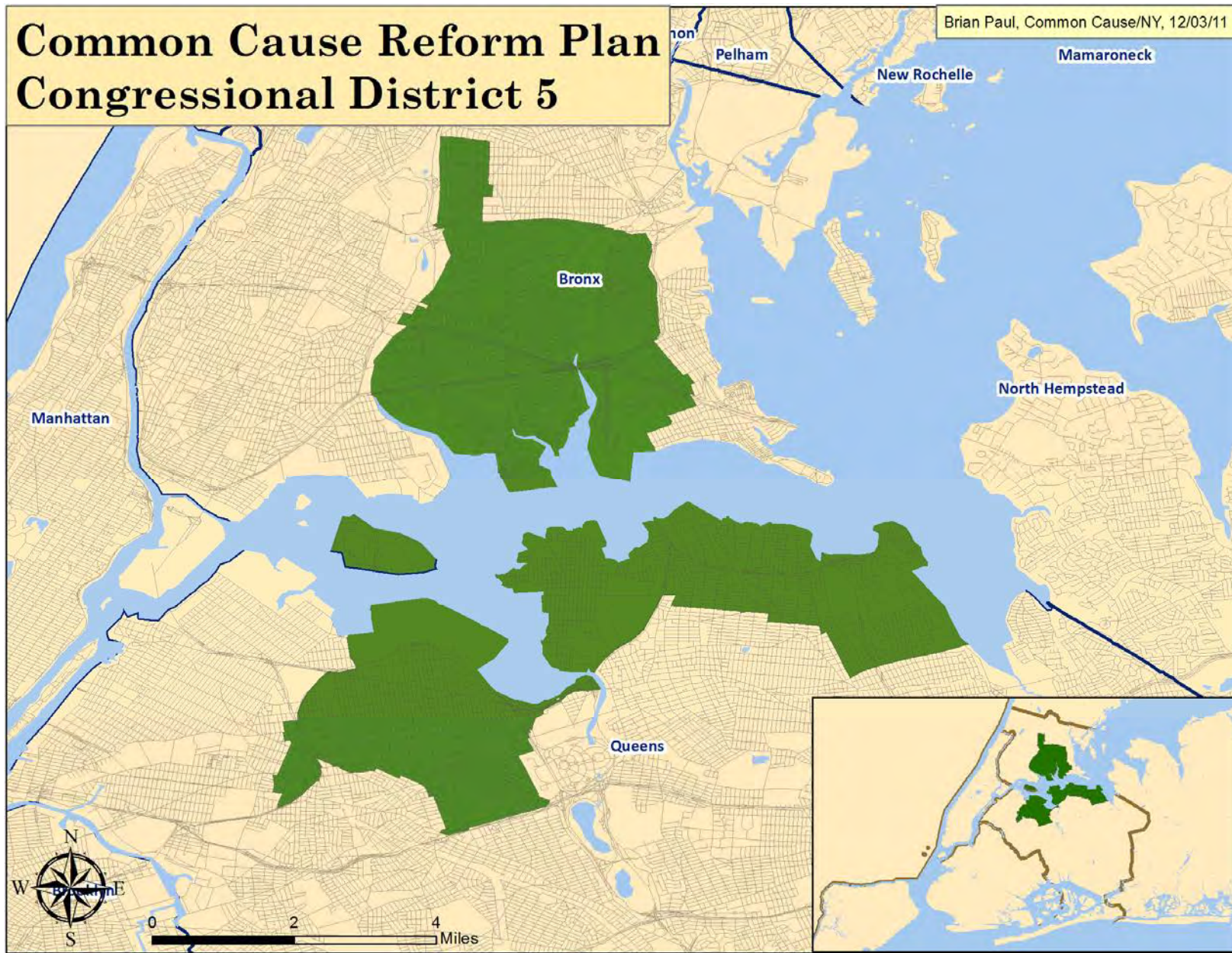
### *Description and explanation*

- CC Reform NY 4 covers southwest Nassau including most of the town of Hempstead, the city of Long Beach, and the southernmost portion of North Hempstead.
  - o Overall, this area of Nassau is distinct from the North Shore according to every socio-economic indicator. Almost the entire southern half of Nassau County has reached population densities greater than 5,000 people per square mile, a level which is generally considered the marker of a “dense urban environment.” It has lower median incomes, lower levels of homeownership and education, and more blue-collar and service-sector workers than the North Shore.
    - Within southern Nassau, the Central Hempstead area is particularly distinct and characterized by higher density, lower middle to middle class incomes, a workforce concentrated in the blue collar and service sectors, and an increasing minority and immigrant populations.

### *Major Demographic Changes:*

- Overall in Nassau, population growth was nearly flat, but population would have declined if not for growth in the county’s minority communities. While the non-Hispanic white voting-age population of Nassau declined by 9% since 2000, the non-Hispanic black voting-age population of Nassau increased by almost 16% and the Hispanic population boomed by more than 48%. Nassau’s voting age population is now nearly 24% black and Hispanic. A more detailed discussion of Nassau’s demographics can be found [by clicking here](#).







## DISTRICT 5 – NORTHEAST QUEENS, SOUTHEAST BRONX

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
5	717,722	553,592	19.0%	14.7%	14.0%	50.2%

### *Description and explanation*

- CC Reform NY 5 includes portions of northeast Queens and the southeast Bronx together in a district connected by the Whitestone and Throgs Neck bridges. In Queens, the district includes the neighborhoods of Corona, Jackson Heights, East Elmhurst, College Point, Beechurst, and Bay Terrace. In the Bronx, the district includes the neighborhoods of Soundview, Castle Hill, Parkchester, Van Nest, and Bronxdale.
  - o These are working-class to middle-income neighborhoods with a mixture of renters and homeowners, and high number of “blue collar” workers. These characteristics make them distinct from the more affluent areas of Central Queens and the more low-income neighborhoods of the Central Bronx.
  - o This district is also characterized by a large and rapidly growing Hispanic population that forms a majority (50.2%) of the voting age population.

### *Major Demographic Changes:*

- Within the area of CC Reform NY 5, the Hispanic population grew by over 20% from 2000 to 2010 and now forms a majority of the voting age population. In contrast, the non-Hispanic white populations of northeast Queens and east Bronx have been steadily declining – by over 15% from 2000 to 2010. For a more detailed discussion of Queens and Bronx demographics, see our [Mapping Democracy](#) blog.



## DISTRICT 6 – JAMAICA AND ROCKAWAYS, QUEENS

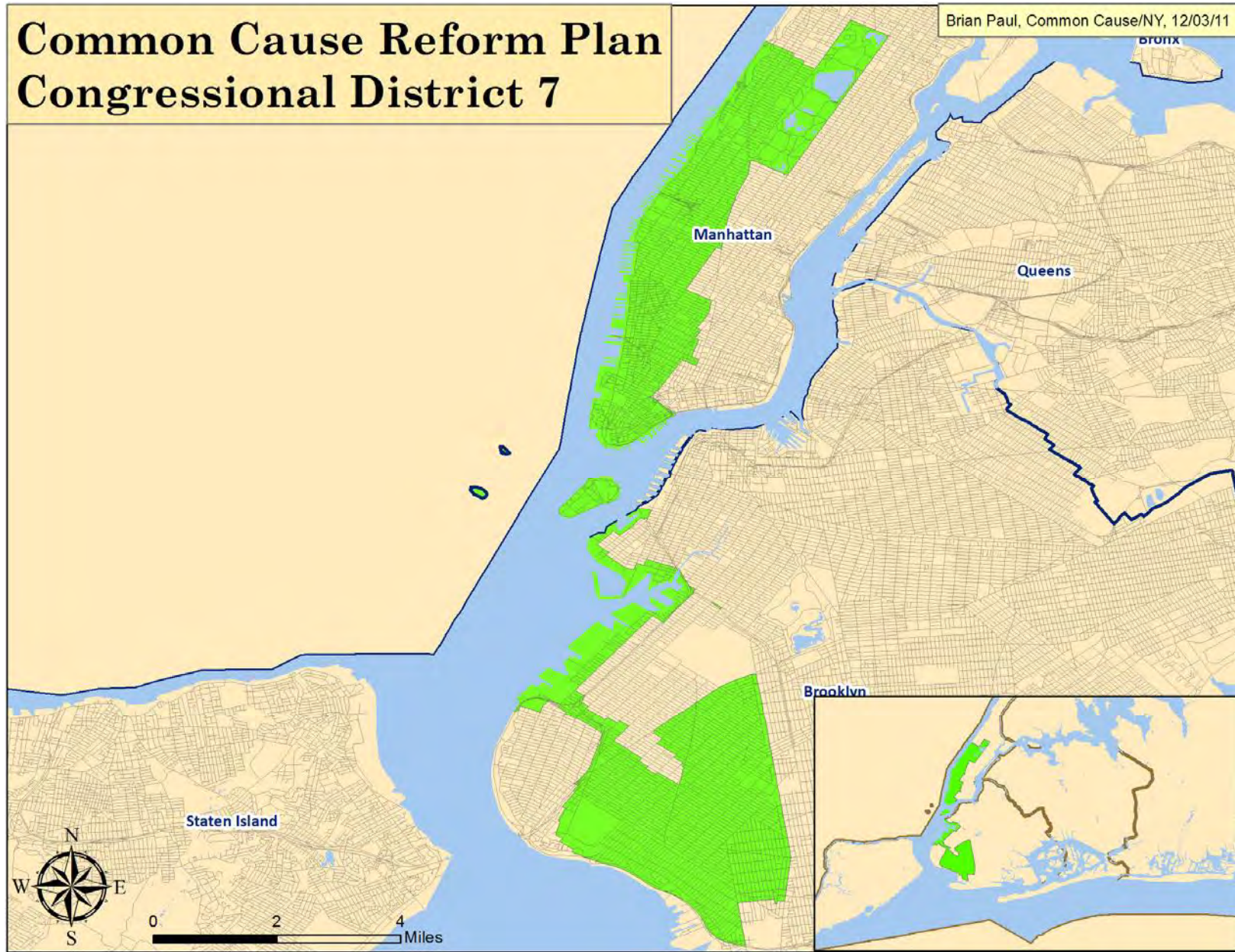
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
6	717,712	548,258	16.6%	45.1%	12.2%	18.9%

### *Description and explanation*

- CC Reform NY 6 is a compact district covering the Jamaica, Richmond Hill, Ozone Park, Howard Beach, and Rockaways areas of southeast Queens. These are middle and working class neighborhoods with a mix of homeowners and renters.
  - o The district is 45.1% NH Black VAP. The current NY 6 was drawn as a majority-NH Black district in the last redistricting cycle. But since 2000, the NH-Black population in the Jamaica area has decreased by more than 8,000 individuals. Like all the Congressional districts, NY 6 must now be larger in order to meet new population numbers.
    - If the district were cut into Brooklyn and Nassau the majority-NHBlack VAP status could be maintained. But as drawn in the CC Reform Plan, 45.1% would still be a dominant plurality within the new district, while keeping in entirely in Queens.

### *Major Demographic Changes:*

- The population of the Jamaica area has become more ethnically mixed over the past decade with growing numbers of Asian and Hispanic residents coupled with a decline in the NH Black population. A detailed discussion of Queens' demographics can be found on Common Cause/NY's [Mapping Democracy blog](#).



## DISTRICT 7 – WEST SIDE MANHATTAN, SOUTH BROOKLYN

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
7	717,694	587,278	66.3%	2.9%	17.9%	11.1%

### *Description and explanation*

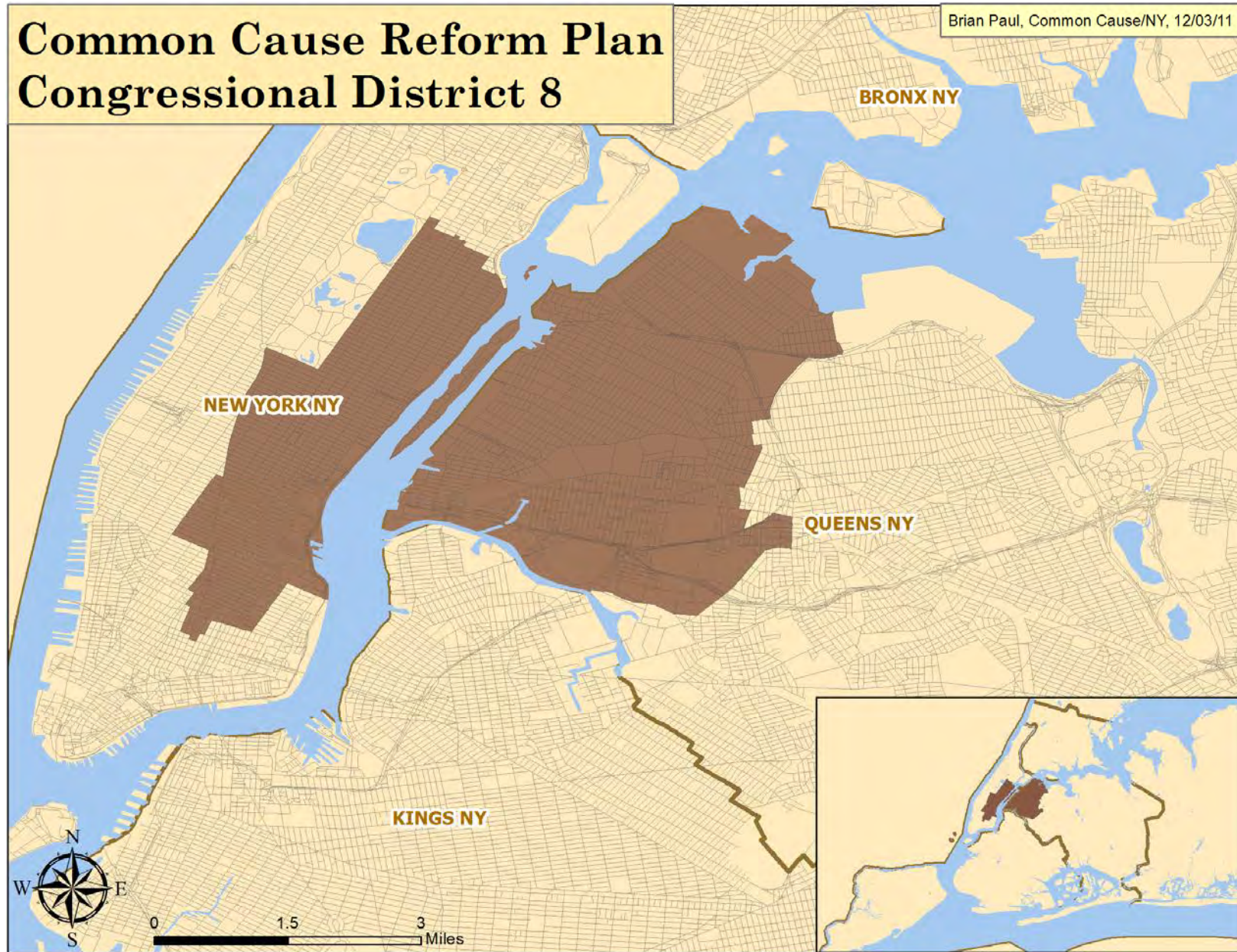
- CC Reform NY 7 consists of two separate areas – the West Side Manhattan, and Central South Brooklyn, linked by the Brooklyn-Battery Tunnel and a connecting strip along the Brooklyn waterfront.
  - o The West Side of Manhattan from the Battery to 92<sup>nd</sup> Street is a community of interest with shared characteristics. Manhattan’s West Side and East Side have separate subway lines and a very different character, especially in Midtown where the Midtown West and Hell’s Kitchen areas retain working class populations and some industrial businesses. The West Side also has the highest concentration of same-sex couples in New York.
  - o Borough Park, Dyker Heights, and Bensonhurst represent a compact area of working class communities, mixed between renters and homeowners, with increasing numbers of immigrants.
    - Including these two separate portions together in a single district is needed in order to balance district populations while making sure to follow the Voting Rights Act in the surrounding areas of Upper Manhattan, the Bronx, and Brooklyn.

### *Major Demographic Changes:*

- The Manhattan core below 96<sup>th</sup> Street and outside of Chinatown-LES grew by 8%, buoyed by new residential construction and conversion in the financial district and far west side. For a detailed discussion of the demographics of Manhattan, [click here](#).
- In South Brooklyn, Hispanic and especially Asian populations increased significantly since 2000, while the non-Hispanic white population declined. For a detailed discussion of the demographics of Brooklyn, [click here](#).

# Common Cause Reform Plan Congressional District 8

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 8 – EAST SIDE MANHATTAN, WEST QUEENS

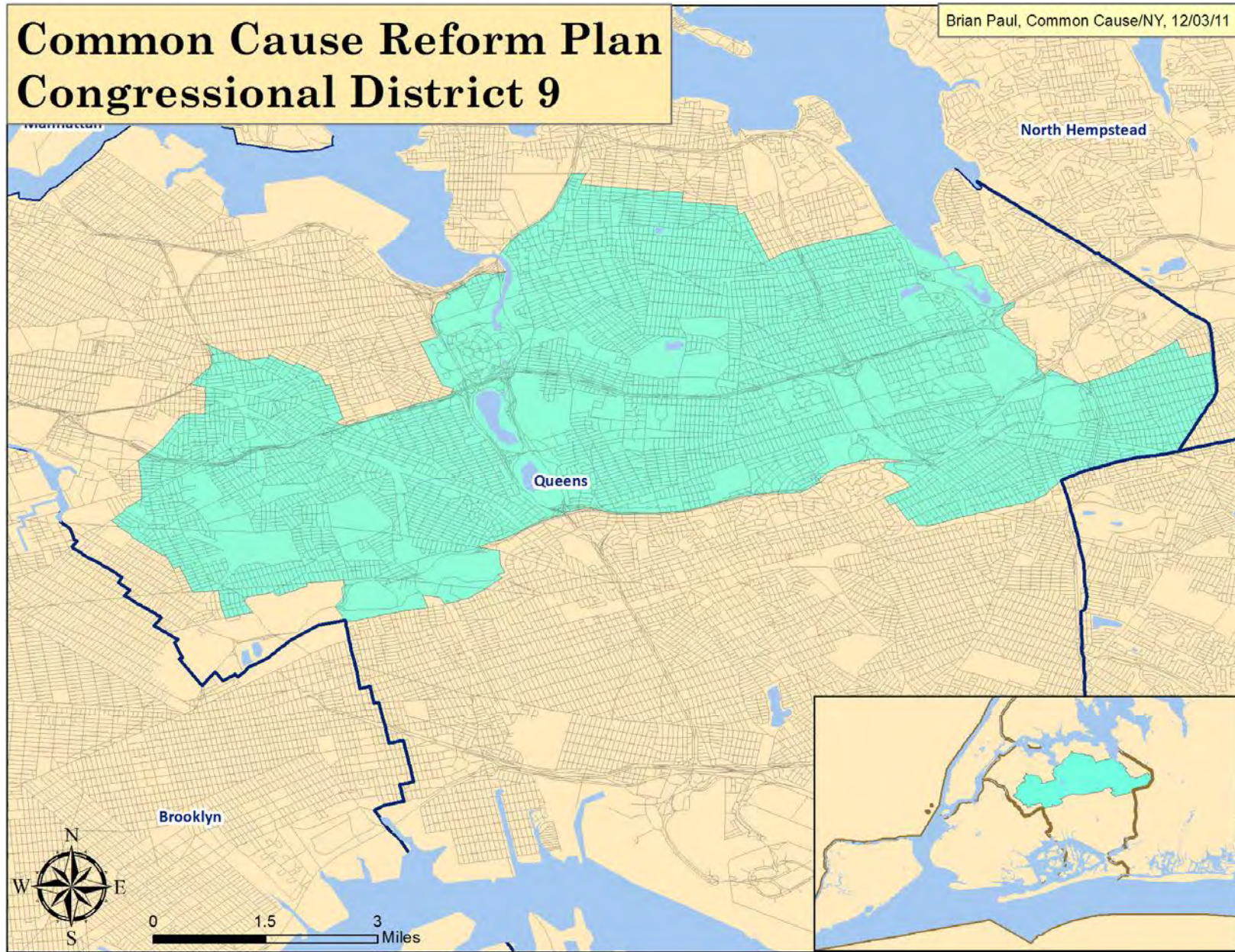
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
8	717,722	626,250	65.1%	3.9%	14.3%	14.5%

### *Description and explanation*

- CC Reform NY 8 is a compact district covering Midtown Manhattan and the East Side from Houston Street to 98<sup>th</sup> Street, Roosevelt Island, as well as the west Queens neighborhoods of Long Island City, Sunnyside, Woodside, and Astoria. The district is connected across the East River by numerous subway lines as well as the Queens Midtown Tunnel and Queensboro Bridge. Like CC Reform NY 7, this is a district consisting of two separate areas that each forms a community of interest.
  - o The East Side of Manhattan is a highly dense, mostly upper-income, “white-collar” community with a higher concentration of homeowners than the rest of Manhattan.
  - o The Long Island City-Astoria area of Queens is characterized by ethnic diversity, a mix of residential and industrial areas, and middle and working class residents.

### *Major Demographic Changes:*

- For detailed demographic analyses of Manhattan and Queens, visit Common Cause/NY’s [Mapping Democracy](#) blog.





## DISTRICT 9 – NORTH/CENTRAL QUEENS

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
9	717,715	584,483	39.2%	4.4%	37.4%	16.4%

### *Description and explanation*

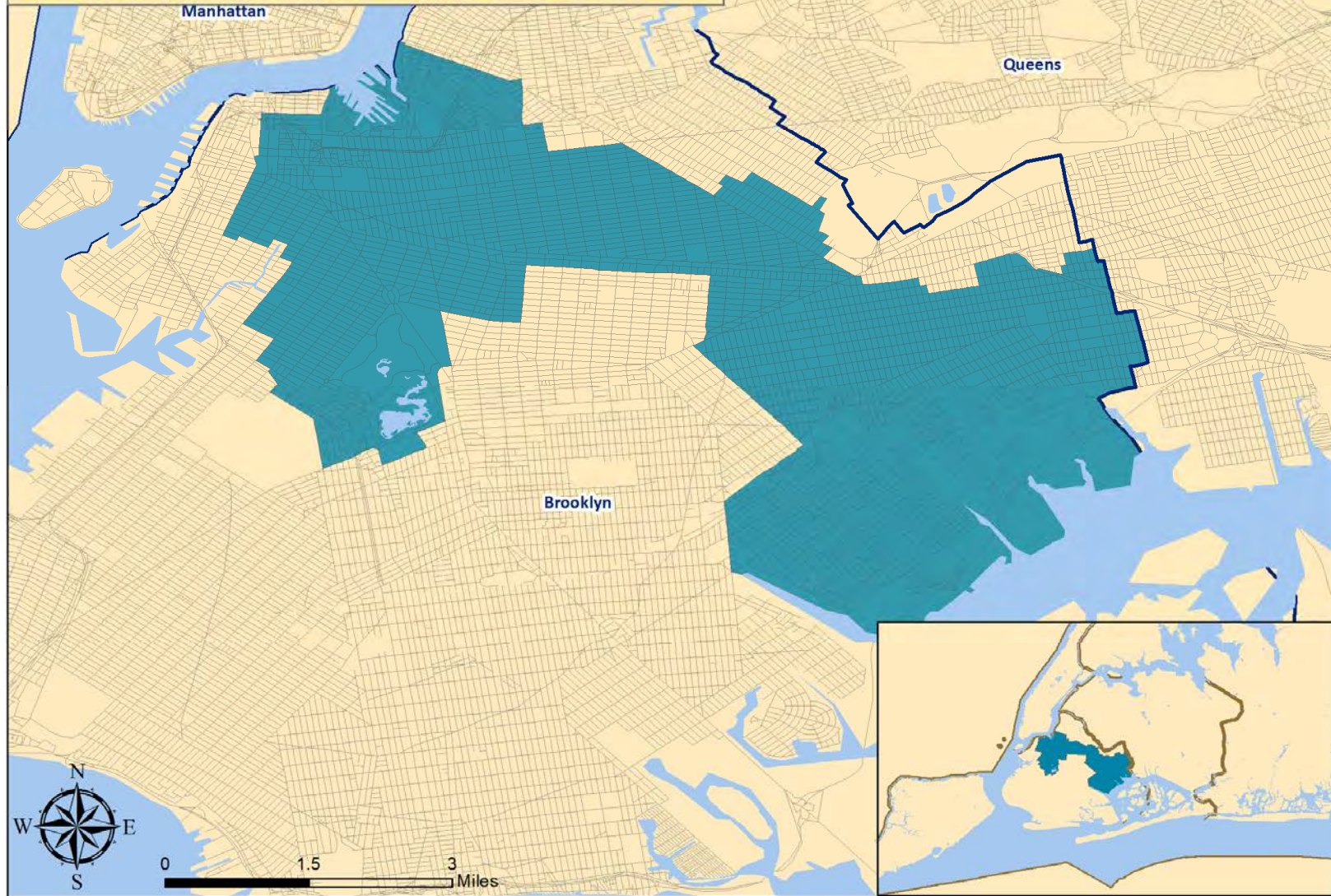
- CC Reform NY 9 covers the neighborhoods of central Queens from Elmhurst and Maspeth all the way to Bayside and Bellrose. Throughout its length, the district seeks to follow neighborhood geographies and keep neighborhoods whole wherever possible.
  - o This area of Queens is a mixture of more suburban neighborhoods of middle and upper income homeowners, and more urban areas like Elmhurst and Flushing.
- Queens is increasingly becoming the “borough of immigrants” and CC Reform NY 9 is a majority-immigrant district (over 50% of the population is foreign born)
- Since 2000, Asian voting age population in Queens has increased by over 30%. Common Cause Reform NY 9 would become 37.4% NH Asian VAP, increasing the influence of this growing community.

### *Major Demographic Changes:*

- Looking at the changes since 2000, Queens shares one major trend in common with many areas upstate – a steep decline in the non-Hispanic white population offset by a rapid rise in the minority population. In Queens, the borough’s demographics continue to shift with the steady decline of long-established white and black communities and the rapid rise of newer immigrant populations. A detailed discussion of Queens’ demographics can be found on Common Cause/NY’s [Mapping Democracy blog](#).

# Common Cause Reform Plan Congressional District 10

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 10 – NORTH AND EAST BROOKLYN

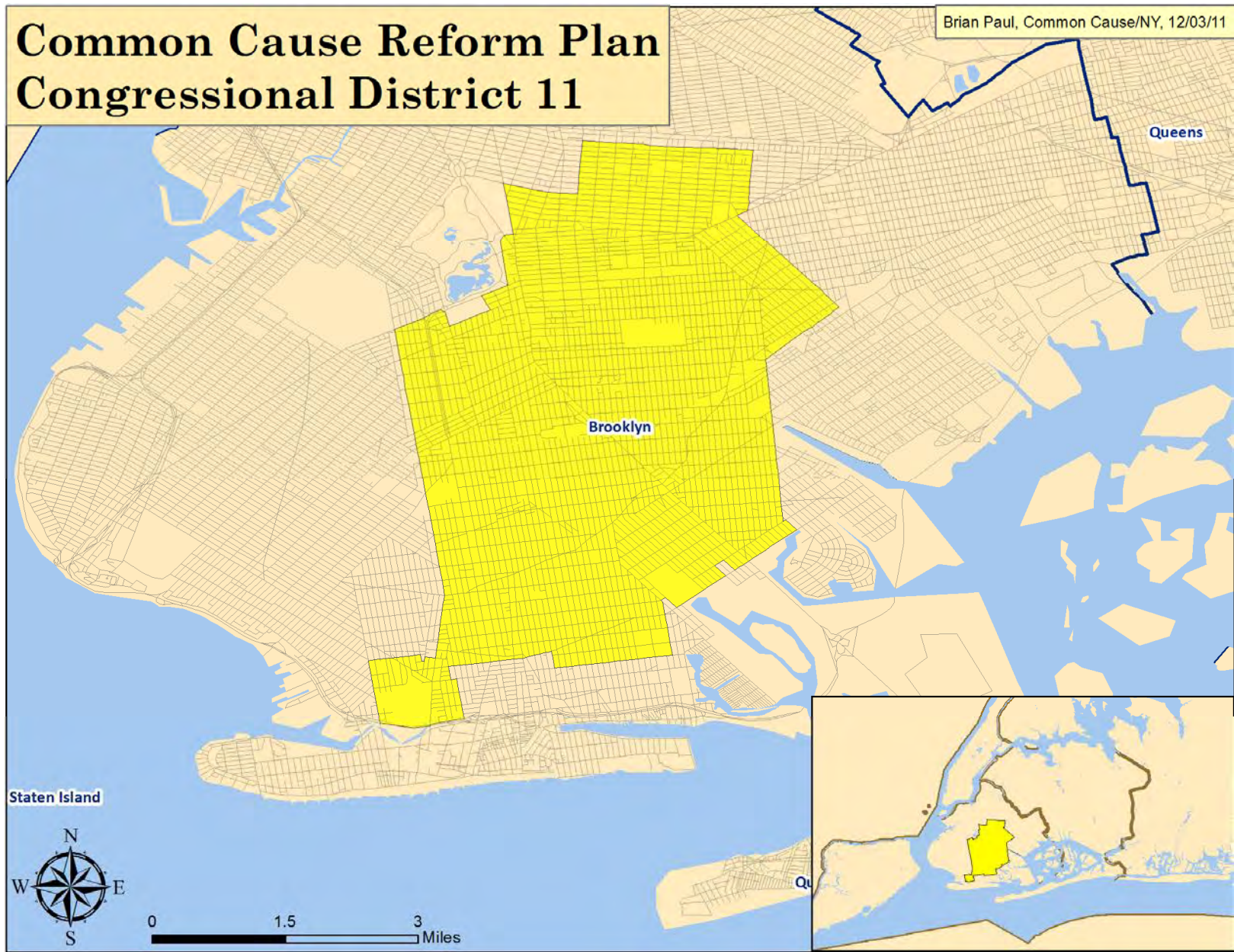
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
10	717,694	534,926	23.4%	52.8%	3.9%	17.5%

### *Description and explanation*

- NY 10 is covered by Section 5 of the Voting Rights Act which protects the ability of minority voters to elect a representative of their choosing by prohibiting any “regression” in minority voting influence.
- CC Reform NY 10 runs east-west from the Canarsie and East New York areas on Jamaica Bay through Brownsville and Bedford-Stuyvesant to Fort Greene, downtown Brooklyn, and Park Slope. Throughout its length, the district seeks to follow neighborhood geographies and keep neighborhoods whole wherever possible.
- Due to the increased size of new Congressional districts, the district drops from 59.5% NH Black to 52.8% NH Black but maintains the majority in compliance with the Voting Rights Act

### *Major Demographic Changes:*

- Many Brooklyn neighborhoods have experienced major demographic changes during the past decade. In Brooklyn, these changes are most often described by the term “gentrification.” The changes in Brooklyn are not just about new people coming in. The overall population of the borough was almost flat – an increase of just 39,374, or 1.6%. Rather, there are significant population and socio-economic shifts within the Borough.
  - o Within CC Reform NY 10, the neighborhoods on the west end of the district like Fort Greene and Prospect Heights have seen significant declines in NH Black population and concurrent gains in NH White population. On the other hand, the Canarsie neighborhood at the east end of the district increased in NH Black population while decreasing in NH White population.
  - o For a more detailed discussion of the demographics of Brooklyn, [click here](#).



## DISTRICT 11 – CENTRAL AND SOUTH BROOKLYN

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
11	717,704	544,624	30.0%	50.8%	6.7%	10.3%

### ***Description and explanation***

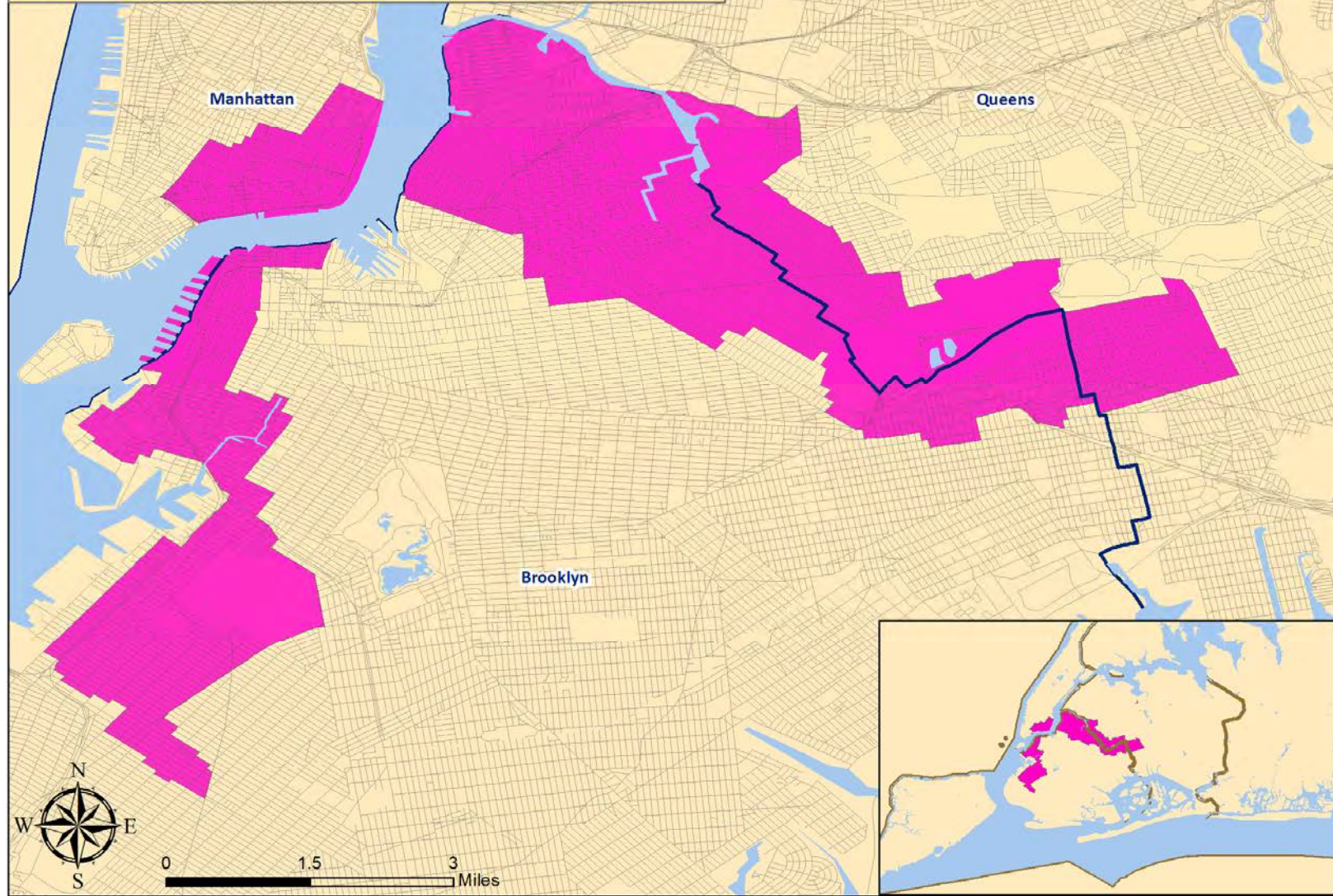
- NY 11 is covered by Section 5 of the Voting Rights Act which protects the ability of minority voters to elect a representative of their choosing by prohibiting any “regression” in minority voting influence.
- CC Reform NY 11 is a compact district in Central and South Brooklyn including the areas of Crown Heights, Flatbush, Kensington, Flatlands, Midwood, Marine Park, and Gravesend.
  - o These working-class to middle-income neighborhoods are a mix of homeowners and renters with a high concentration of immigrants (the district is close to 50% foreign born). Compared to the areas of Brooklyn covered by CC Reform NY 10, these areas are more middle-income and have a higher concentration of homeowners.
- Due to the increased size of new Congressional districts, the district drops from 52.9% NH Black to 50.8% NH Black but maintains the majority in compliance with the Voting Rights Act.

### ***Major Demographic Changes:***

- While the overall black population of Brooklyn increased by 2.3%, the black population of the northern half of the borough *decreased* by more than 18,000 individuals (-7%). Looking at a map of population change from 2000 to 2010, the black population clearly shifted to the south and east. For more detailed information on the demographics of Brooklyn, [click here](#).

# Common Cause Reform Plan Congressional District 12

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 12 – WOODHAVEN-BUSHWICK-WILLIAMSBURG LOWER EAST SIDE – SUNSET PARK

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
12	717,690	566,654	29.7%	7.9%	20.1%	40.1%

### *Description and explanation*

- NY 12 is covered by Section 5 of the Voting Rights Act which protects the ability of minority voters to elect a representative of their choosing. The district combines the Latino neighborhoods of North Brooklyn with the Lower East Side and Sunset Park and also combines Manhattan’s Chinatown with Brooklyn’s Chinatown in Sunset Park.
- Although the shape of the district may not be compact, most of the communities within the district have a similar demographic profile of working class renters who take public transit and often work in “blue collar” industrial jobs.
- The district follows neighborhood boundaries and maintains 40.1% Hispanic VAP while increasing Asian VAP to 20.1%.

### *Major Demographic Changes:*

- Williamsburg, Bushwick, the Lower East Side, Red Hook, and to a lesser extent, Sunset Park, are all areas facing the challenges of gentrification. Especially in Williamsburg and the Lower East Side, lower income minorities are being displaced to make way for more affluent residents. For a detailed discussion of the demographics of Manhattan, [click here](#) and for Brooklyn, [click here](#).





## DISTRICT 13 – STATEN ISLAND, SOUTH BROOKLYN

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
13	717,706	562,143	68.5%	7.7%	8.5%	13.8%

### ***Description and explanation***

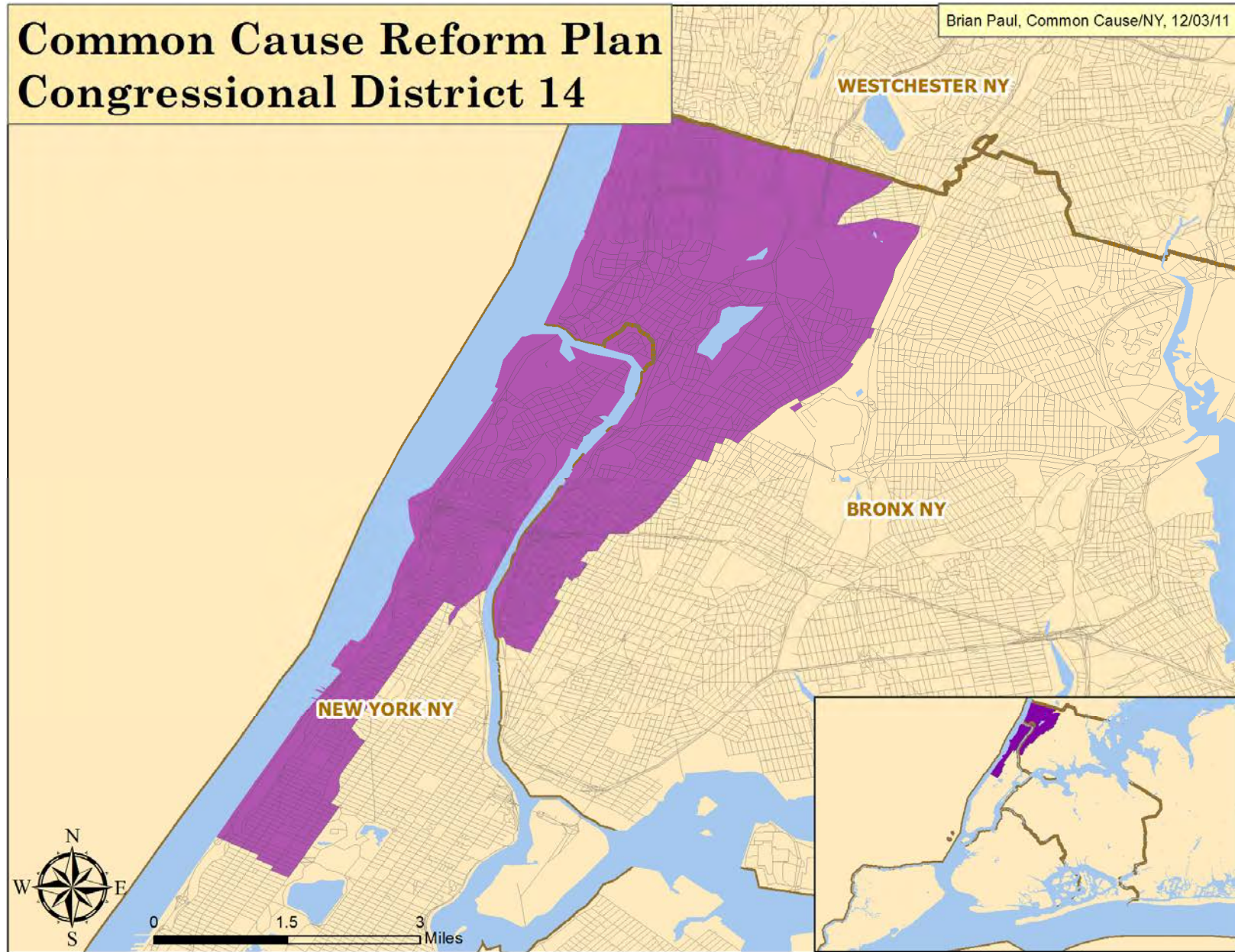
- CC Reform NY 13 covers all of Staten Island and the South Brooklyn shore including the neighborhoods of Bay Ridge, Coney Island, Brighton Beach, Manhattan Beach, Gerritsen Beach, and Mill Basin.
  - o Staten Island is not large enough to host its own entire Congressional District so the district must cross to Brooklyn. The communities in the South Brooklyn portion of this district are mostly middle-income, home-owning communities like those in most of Staten Island.

### ***Major Demographic Changes:***

- Staten Island and South Brooklyn have become more diverse over the past 10 years. Hispanic, Asian and NH Black population in Staten Island all grew significantly while the NH White population actually experienced a small decline.

# Common Cause Reform Plan Congressional District 14

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 14 – WEST HARLEM, WASHINGTON HEIGHTS, NORTHWEST BRONX

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
14	717,699	557,720	22.7%	16.1%	4.9%	54.5%

### *Description and explanation*

- CC Reform NY 14 is a compact district covering the northern half of Manhattan’s west side (from 94<sup>th</sup> St north through Morningside Heights, West Harlem, Washington Heights, and Inwood) and the neighborhoods of the Northwest Bronx (including Riverdale, Kingsbridge, Norwood, University Heights, Morris Heights, and Highbridge).
  - o With the exception of the affluent suburban Riverdale area, the neighborhoods of this district have much in common: dense neighborhoods of tenements and row houses, a working class population, and interconnected transportation (subway lines and two major North-South highways). Washington Heights and the Northwest Bronx are also home to the world’s largest Dominican community outside of the Dominican Republic.
- CC Reform NY 14 is covered by Section 5 of the Voting Rights Act which protects the ability of minority voters to elect a representative of their choosing.
  - o Recognizing the growth of the Hispanic community in the Bronx, this district forms a new majority-Hispanic district (54.5% Hispanic VAP). At the Bronx LATFOR public hearing, numerous community residents testified in support of a new Congressional District combining Washington Heights with the Northwest Bronx.
    - NY 14 is the second of two new Hispanic-majority Congressional Districts drawn in the Bronx in the CC Reform Plan, the other being CC Reform NY 5.

### *Major Demographic Changes:*

- Overall, the population of the Bronx has grown by almost 4% since 2000, but the Hispanic population increased by over 20%, making the Bronx a majority-Hispanic borough for the first time. A detailed discussion of Bronx demographics can be found on the Common Cause/NY [Mapping Democracy blog](#).



## DISTRICT 15 – HARLEM, SOUTH BRONX

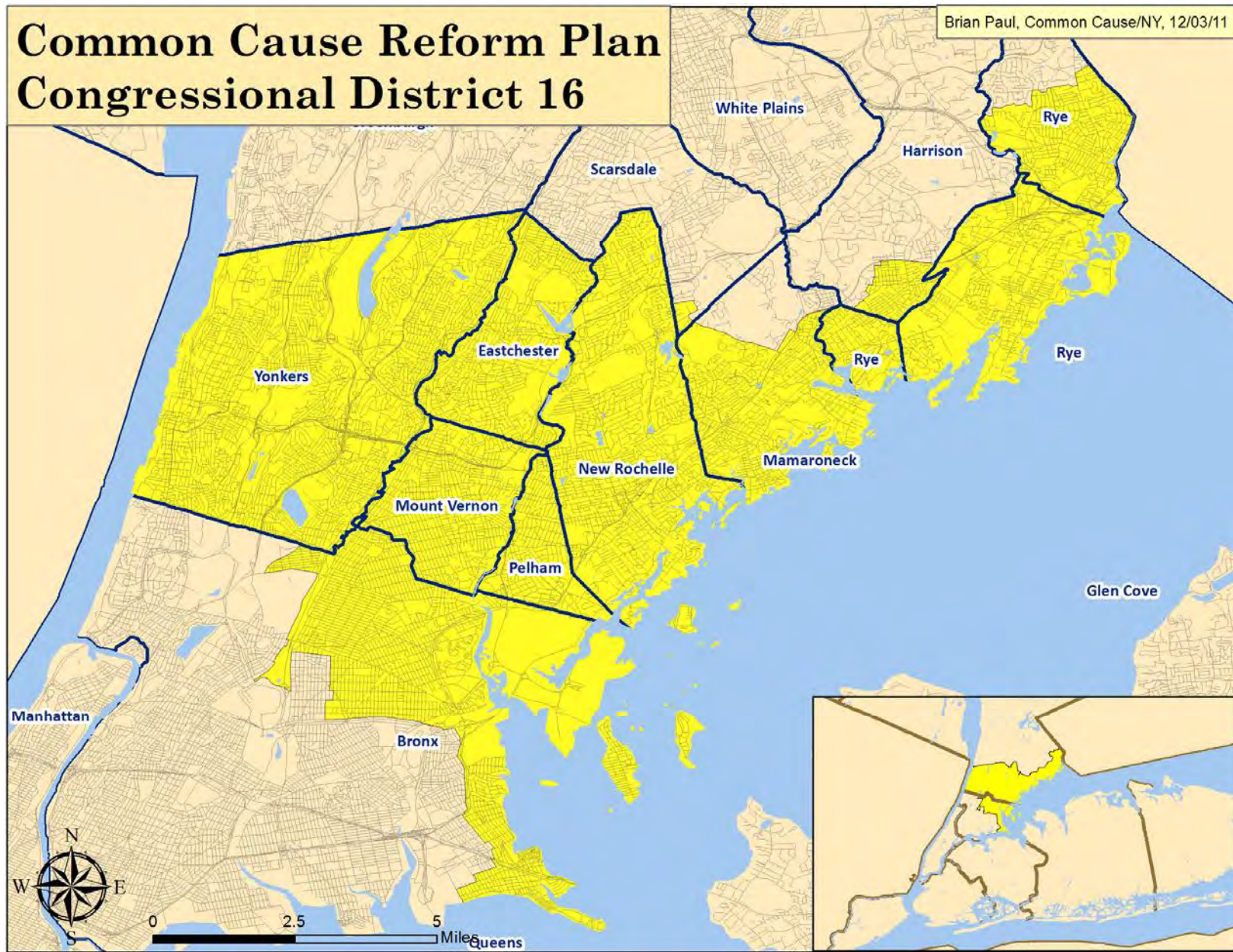
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
15	717,711	523,091	7.0%	36.5%	2.5%	52.1%

### **Description and explanation**

- CC Reform NY 15 is a compact district that includes central and East Harlem and the core of the central and south Bronx. These areas are well connected by subway and bridges and share demographic commonalities as working-class and low-income communities of renters who are highly dependent on public transit and likely to be employed in blue collar and service sector jobs.
- NY 15 is covered by the Voting Rights Act which protects the ability of minority voters to elect a representative of their choosing. NY 15 (Rangel-D) consists of all of Manhattan north of 96<sup>th</sup> Street. It is currently 43.8% Hispanic VAP and 26.5% NH Black VAP. CC Reform NY 15 increases Hispanic VAP to 52.1% and non-Hispanic Black VAP to 36.5%.
  - o The Bronx is now a majority-Hispanic borough, however, all districts must increase in population size without causing “regression” to the voting rights of the black community in Harlem.
    - The CC reform map seeks to resolve this potential conflict by drawing *three* majority-Hispanic districts (5, 14, and 15) in the Bronx and Upper Manhattan while also increasing the non-Hispanic black percentage of NY 15. Because CC Reform NY 15 increases the NH Black percentage as well as the Hispanic percentage, it avoids regression and would not adversely affect the ability of the black community to participate in the political process and elect a candidate.

### **Major Demographic Changes:**

- During the last decade, the overall non-Hispanic black voting-age population of Manhattan declined by more than 7%. More than 10,000 black voters left the Harlem area. At the same time, Harlem’s Hispanic and non-Hispanic white populations have significantly increased since 2000, making it more diverse than it has been in decades. For a detailed discussion of the demographics of Manhattan, [click here](#).
- In contrast, the non-Hispanic black voting-age population of the Bronx grew by almost 20,000 and much of this growth took place in the south and central Bronx areas covered by CC Reform NY 15. Hispanic growth in this area has been even stronger. Detailed Bronx demographics are discussed on the Common Cause/NY [Mapping Democracy blog](#).
  - o Looking at both these trends in Harlem and the South Bronx, it makes sense to extend NY 15 from Harlem into the Bronx.



## DISTRICT 16 – NORTHEAST BRONX, SOUTHERN WESTCHESTER

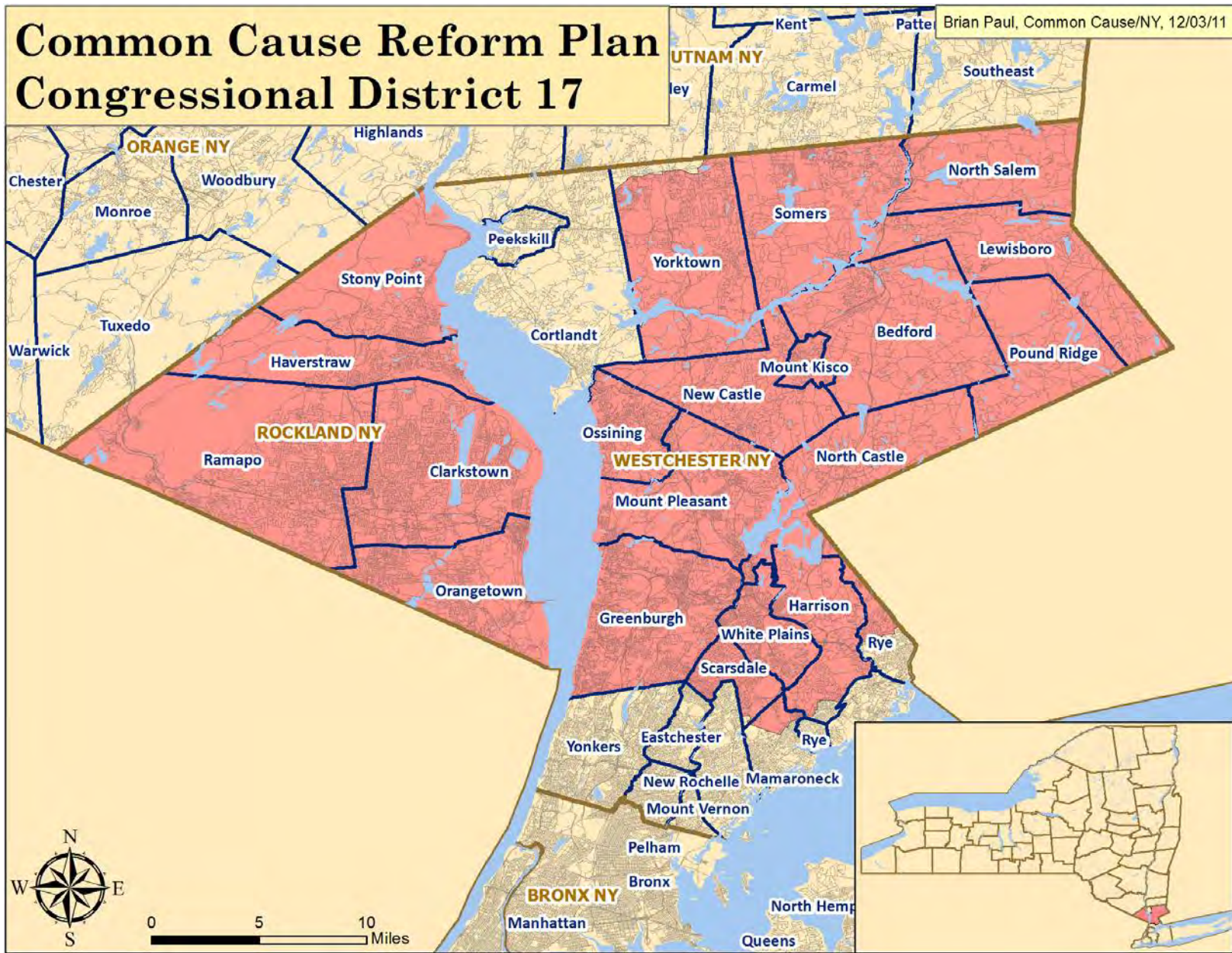
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
16	717,705	549,100	39.7%	30.0%	4.1%	24.1%

### ***Description and explanation***

- CC Reform NY 16 combines the East and Northeast Bronx with the more urban cities and towns of Southern Westchester including Yonkers, Mount Vernon, New Rochelle, Mamaroneck, Rye, and Port Chester.
  - o These Southern Westchester areas are demographically similar to the North Bronx (lower income, non-home-owning, “blue collar” residents).
  - o The district also follows municipal boundaries as closely as possible, notably keeping the cities of Yonkers, Mount Vernon, and New Rochelle wholly within a single district.
- CC Reform NY 16 is a majority-minority coalition district that is 30.0% NH Black and 24.1% Hispanic.

### ***Major Demographic Changes:***

- Both the Northeast Bronx and Southern Westchester have become increasingly diverse during the last decade. The non-Hispanic white share of the population has decreased while the black, Asian, and Hispanic population has increased.
- A detailed discussion of Southern Westchester’s demographics, including a discussion of different communities of interest in the region, along with illustrative maps, can be found on Common Cause/NY’s redistricting blog, [Mapping Democracy](#).





## DISTRICT 17 – WESTCHESTER-ROCKLAND

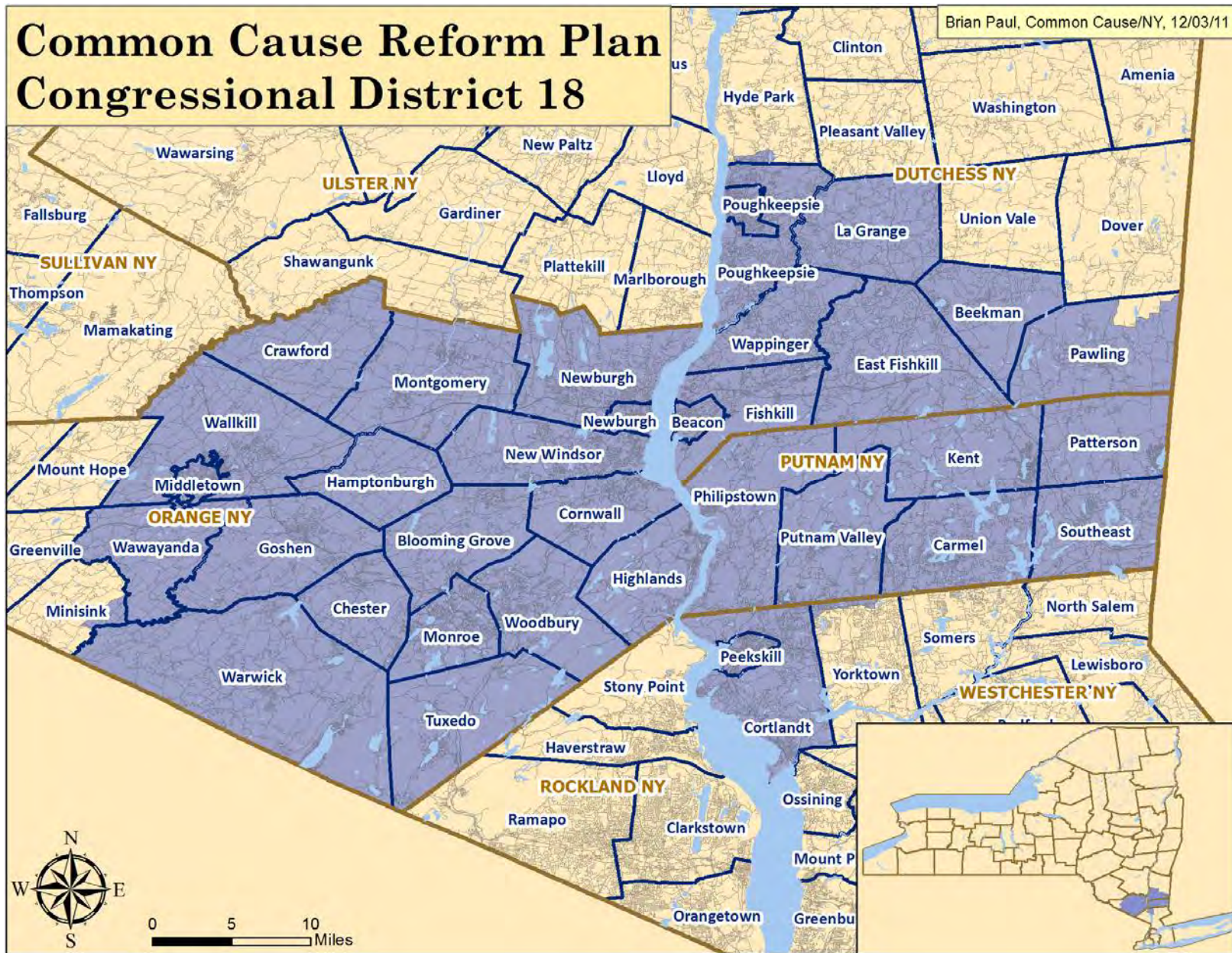
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
17	717,713	530,943	68.0%	9.1%	6.4%	15.1%

### **Description and explanation**

- Throughout Upstate New York, the Common Cause Reform Plan seeks to keep distinct regions of the state (defined by economics, politics, geography, and actual shared interests) together and follow county, town, and city lines as closely as possible.
- CC Reform NY 17 is a compact district covering the suburban communities of Westchester and Rockland counties, connected by the Tappan Zee Bridge. The district includes all of Rockland and most of Central and Northern Westchester with the exception of Cortlandt and Peekskill (which are not included due to population math).

### **Major Demographic Changes:**

- Hispanic populations increased significantly along the I-287 corridor from Port Chester to White Plains and Tarrytown, and across the Tappan Zee Bridge in the Spring Valley area of Rockland.
- A detailed discussion of Southern Westchester’s demographics, including a discussion of different communities of interest in the region, along with illustrative maps, can be found on Common Cause/NY’s redistricting blog, [Mapping Democracy](#). Northern Westchester and Rockland are included in the Hudson Valley region post found [here](#).



## DISTRICT 18 – MID-HUDSON VALLEY

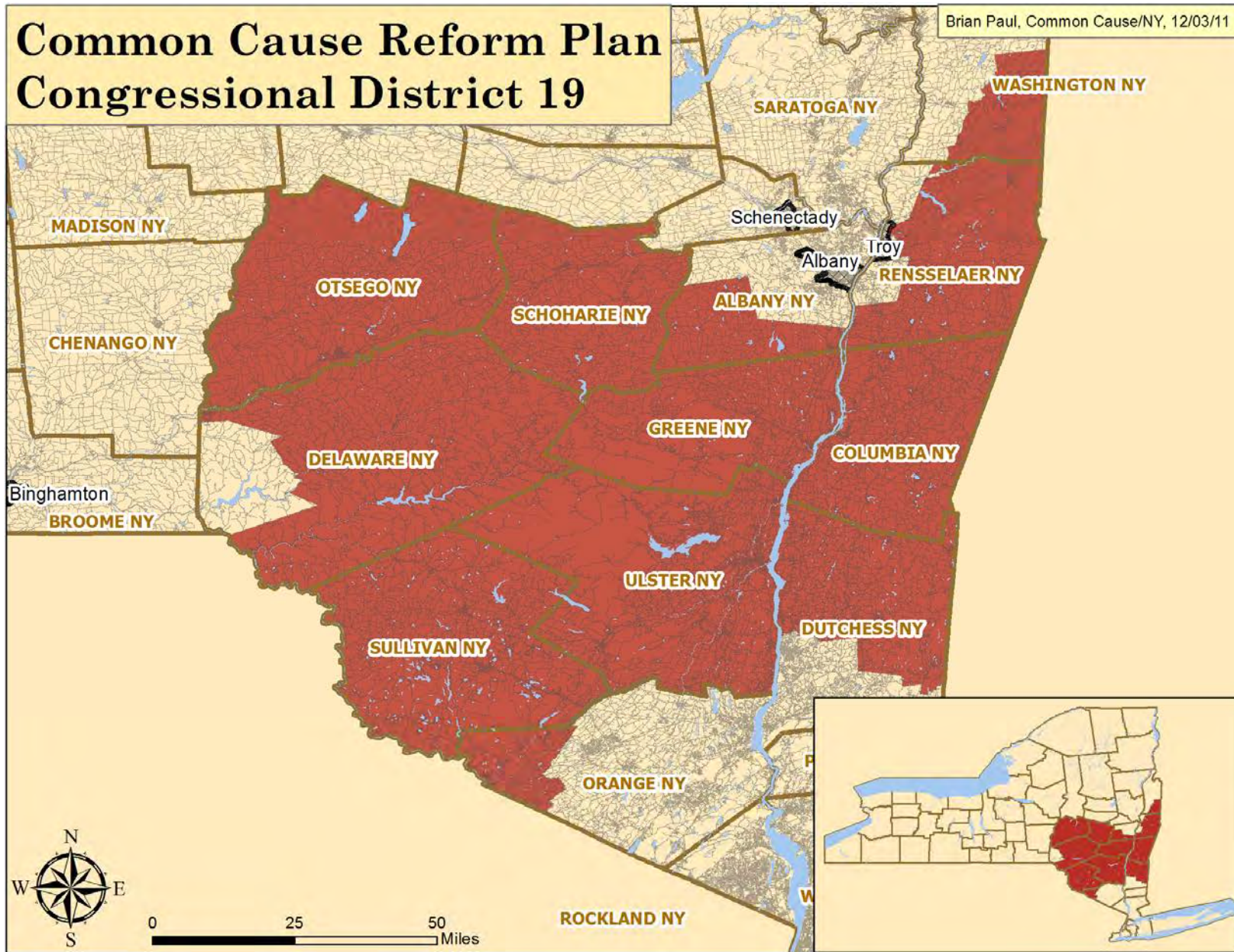
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
18	717,707	536,675	72.2%	9.0%	2.9%	14.3%

### *Description and explanation*

- CC Reform NY 18 consolidates the cities of the Hudson Valley (Peekskill, Beacon, Newburgh, Middletown, Poughkeepsie) together in a single more compact mid-Hudson Valley district. The district includes a small part of northern Westchester, all of Putnam, Southern Dutchess, and most of Orange counties.
  - o The urban communities of the Hudson Valley share many demographic characteristics in common besides density and significant minority populations. Overall, residents of the region’s five cities are lower income, non-home-owning, residents, in “blue collar” jobs.
- In addition to keeping the small cities together, it is appropriate for NY 18 to cross the Hudson and include Southern Dutchess with Putnam and Orange because these areas are the “frontier” of New York City suburban commuting – the northernmost area where large numbers of residents commute to and are oriented towards New York City.

### *Major Demographic Changes:*

- The mid-Hudson Valley region of Northern Westchester, Rockland, Orange, Putnam, Southern Dutchess, and Southern Ulster represents the fastest growing region of New York from 2000 to 2010, increasing in population by 7%. A detailed analysis of the demographics of this region, including illustrative maps and a discussion of some of the assumptions and factors shaping the districts drawn in the Common Cause Reform Map can be found on Common Cause/NY’s redistricting blog, [Mapping Democracy](#).



## DISTRICT 19 – CATSKILLS, UPPER HUDSON VALLEY

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
19	717,716	568,958	87.9%	4.0%	1.3%	5.5%

### ***Description and explanation***

- CC Reform NY 19 is a large, but compact, regional district for the Catskills and Upper Hudson Valley. This is a rural area with a few small cities and towns and an economy mostly dependent on agriculture and tourism.
  - o Compared to any of the surrounding regions like the Hudson Valley, Southern Tier, Capital Region, or Mohawk Valley, the Catskills and Upper Hudson is a distinct social and economic unit and should have a unified voice in Congress.

### ***Major Demographic Changes:***

- While the far southern portion of the district has gained significant population since 2000, most of the Catskills and Upper Hudson population remained flat or even lost population.



## DISTRICT 20 – CAPITOL REGION

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
20	717,713	564,040	82.6%	7.7%	3.4%	4.2%

### *Description and explanation*

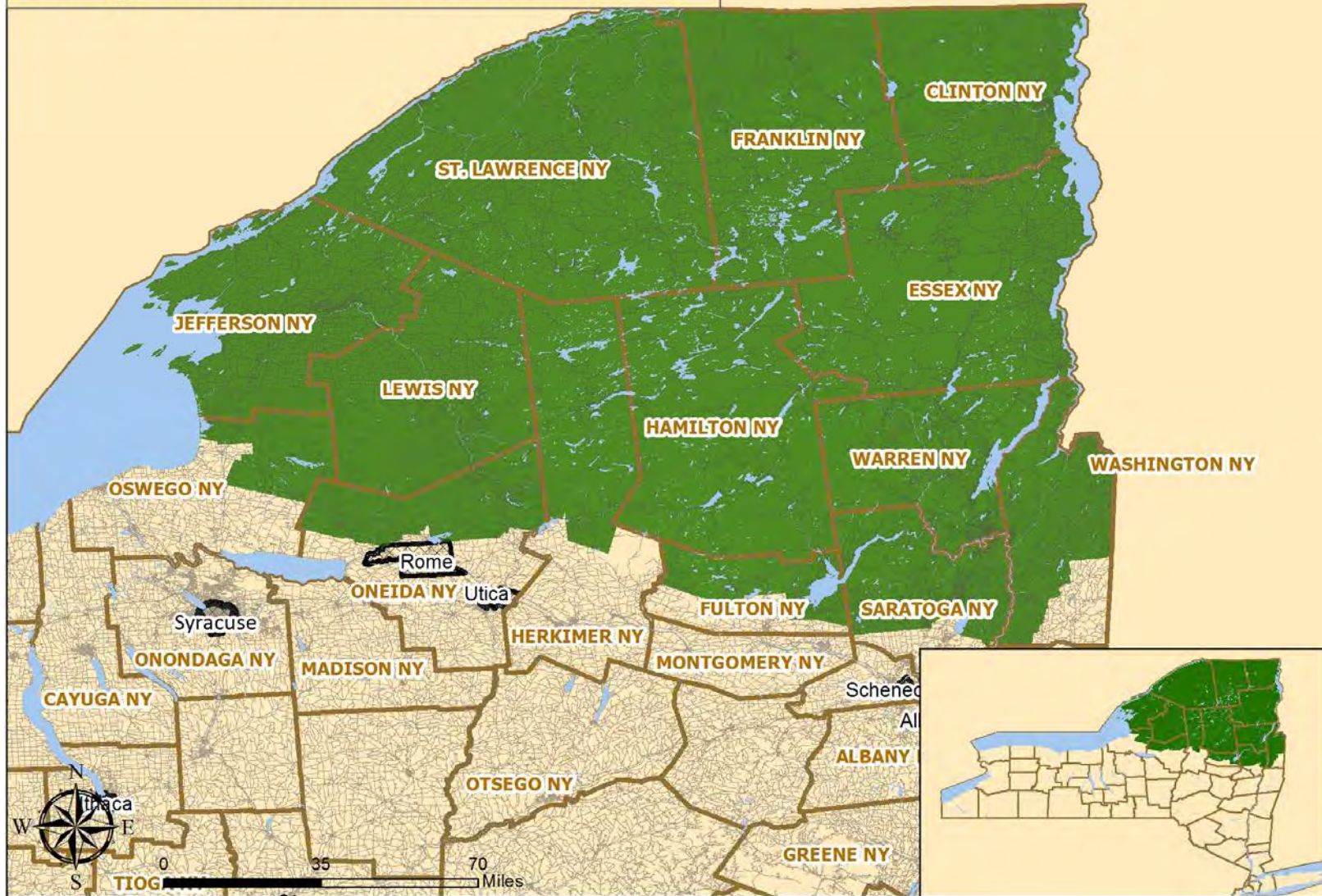
- CC Reform NY 20 is a compact district centered on the three Capitol Region cities (Albany, Troy, and Schenectady) and their suburbs. The district follows town lines as closely as possible while achieving the appropriate population.

### *Major Demographic Changes:*

- The Capital Region and each of the three cities all grew in population from 2000 to 2010. Albany, Troy, and Schenectady collectively grew by 3.6% while the region as a whole (defined as all cities and towns within 15 miles of Albany) grew over 5%.
- This growth marks a historic reversal from four decades of population decline from 1960 to 2000, driven by an increasing minority presence. While the white population of the region continued to decline, the loss was outweighed by a near 30% increase in the black population and a Hispanic community that almost doubled in size.
  - o See the discussion of the demographics of the Capitol Region on the [Mapping Democracy blog](#) for more details.

# Common Cause Reform Plan Congressional District 21

Brian Paul, Common Cause/NY, 12/03/11





## DISTRICT 21 – NORTH COUNTRY

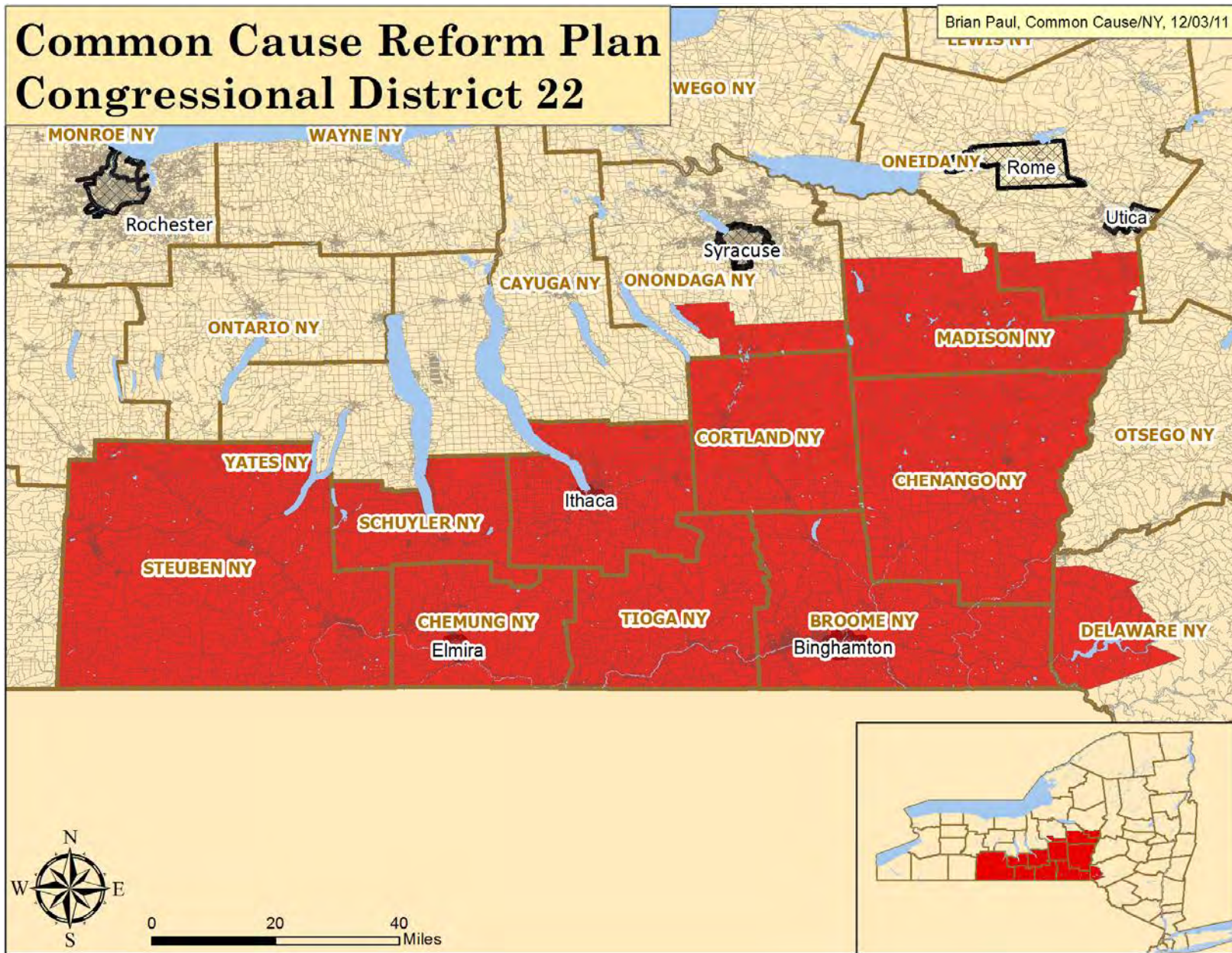
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
21	717,709	561,034	92.1%	2.8%	0.8%	2.4%

### *Description and explanation*

- CC Reform NY 21 is a large, but compact, district for the North Country region, including Clinton, Franklin, St. Lawrence, Jefferson, Lewis, Hamilton, Essex, Warren and the northern portions of Oswego, Oneida, Herkimer, Fulton, Saratoga, and Washington Counties.
  - o The North Country is, without question, a unique region. Dominated by the rugged mountain geography of Adirondack State Park, the region is by any measure the most rural and least developed in New York State. Its economy is highly dependent on tourism and agriculture, especially dairy farms.

### *Major Demographic Changes:*

- The North Country experienced a population increase of roughly 2.7% from 2000 to 2010. This increase took place mostly in Jefferson County and the Plattsburgh and Glens Falls areas.
- We agree with Assemblymember Ken Blankenbush (R, AD 122), who argued at LATFOR hearings that the North Country region is a distinct community with different interests and priorities than the regions to the south. A detailed discussion of demography of the North Country can be [found here](#).



## DISTRICT 22 – SOUTHERN TIER

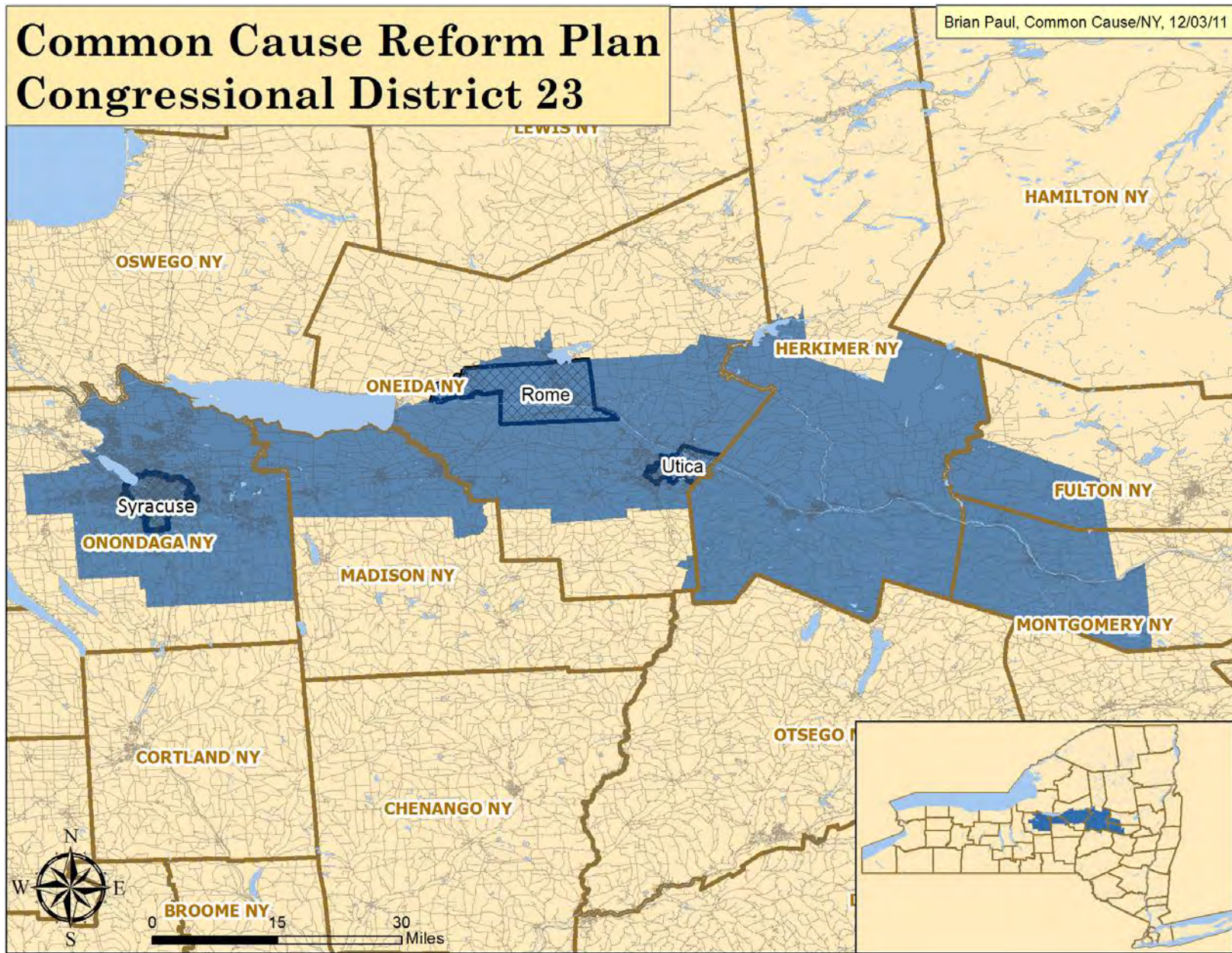
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
22	717,695	567,118	90.4%	3.0%	2.9%	2.3%

### *Description and explanation*

- CC Reform NY 22 is a large, but compact, district for the Southern Tier region, including Chenango, Broome, Cortland, Tioga, Tompkins, Schuyler, Chemung, Steuben, and parts of Onondaga, Madison, Oneida, and Delaware counties.
- The Southern Tier is a regionally distinct area which should be kept whole.

### *Major Demographic Changes:*

- The Southern Tier region of New York State is predominantly rural. From 2000 to 2010, the region grew by an estimated 1,695 residents, or 0.2%. However, the region's population would indeed have declined if not for major growth in the minority communities, which are mostly within the region's small cities. A detailed discussion of the demographics of this region can be found on the Common Cause/NY redistricting blog, [Mapping Democracy](#).



## DISTRICT 23 – MOHAWK VALLEY - SYRACUSE

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
23	717,709	555,871	84.3%	7.7%	2.8%	3.4%

### ***Description and explanation***

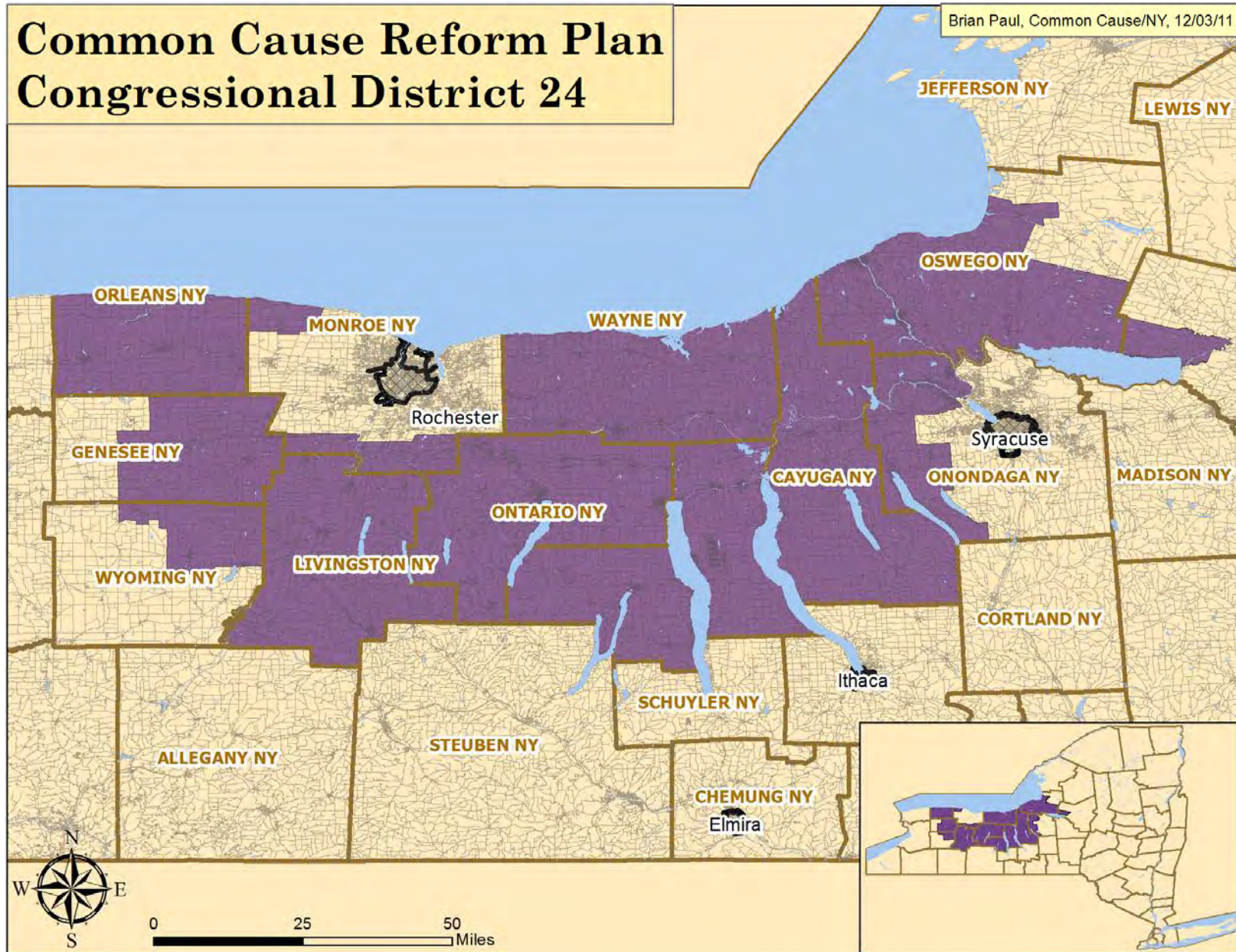
- CC Reform NY 23 covers the Mohawk Valley region, including portions of Fulton, Montgomery, Herkimer, Oneida, Madison, and Onondaga counties.
  - o The Mohawk Valley lies between the Albany region and Syracuse area along the Mohawk River and Erie Canal and is home to numerous towns and cities with a shared industrial heritage (including Amsterdam, Gloversville, Johnstown, Little Falls, Herkimer, Utica, Rome, and Syracuse). The region is also closely connected by the New York State Thruway.
  - o Syracuse is better suited to a district which includes its fellow small cities, Rome and Utica, situated close to the east in Oneida County, than a district that extends to the rural counties to its west.

### ***Major Demographic Changes:***

- From 2000 to 2010, the population of the City of Syracuse declined by 1.5% to a total of 145,170. This decline is considerably less than the other major Upstate cities due to considerable growth in the city's minority communities, which offset some of the white population decline. A detailed discussion of the demographics of the Syracuse region, including illustrative maps can be found on the Common Cause/NY [Mapping Democracy blog](#).
- Overall the population of the rest of the Mohawk Valley region was nearly flat from 2000 to 2010.

# Common Cause Reform Plan Congressional District 24

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 24 – FINGER LAKES, LAKE ONTARIO SHORE

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
24	717,695	556,539	93.0%	2.8%	0.7%	2.3%

### ***Description and explanation***

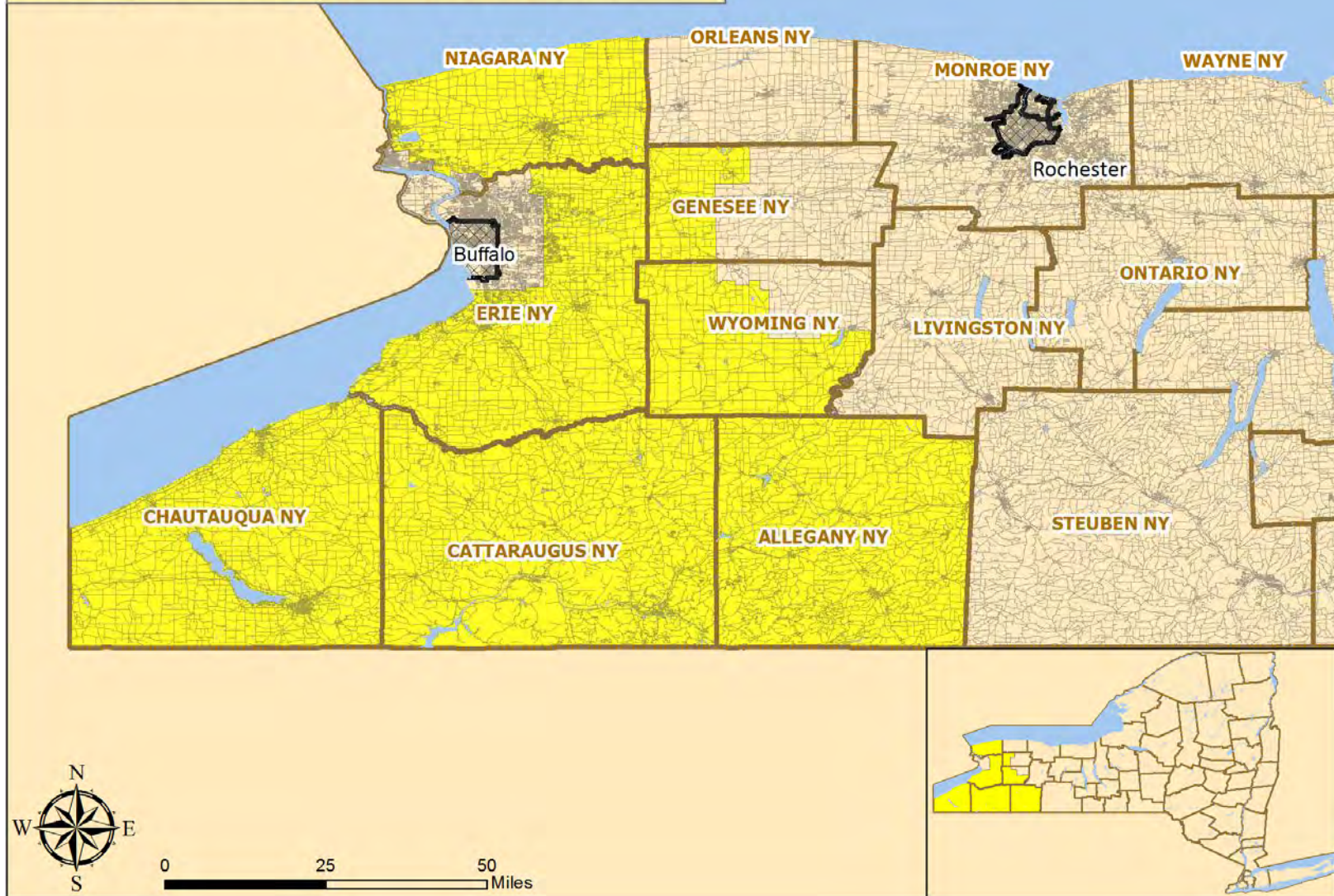
- CC Reform NY 24 is based around a distinct geographic and socio-economic region – the mostly rural, agricultural areas of the Finger Lakes and Lake Ontario shore. This is the most productive agricultural region of the state and is connected by the NY State Thruway running east-west. As such, it represents a unique community of interest.

### ***Major Demographic Changes:***

- Population change within this district from 2000 to 2010 varied widely depending on the particular area. Overall, the region was nearly flat in population growth.

# Common Cause Reform Plan Congressional District 25

Brian Paul, Common Cause/NY, 12/03/11





## DISTRICT 25 – RURAL WESTERN NEW YORK

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
25	717,700	557,537	93.9%	1.7%	0.7%	2.0%

### ***Description and explanation***

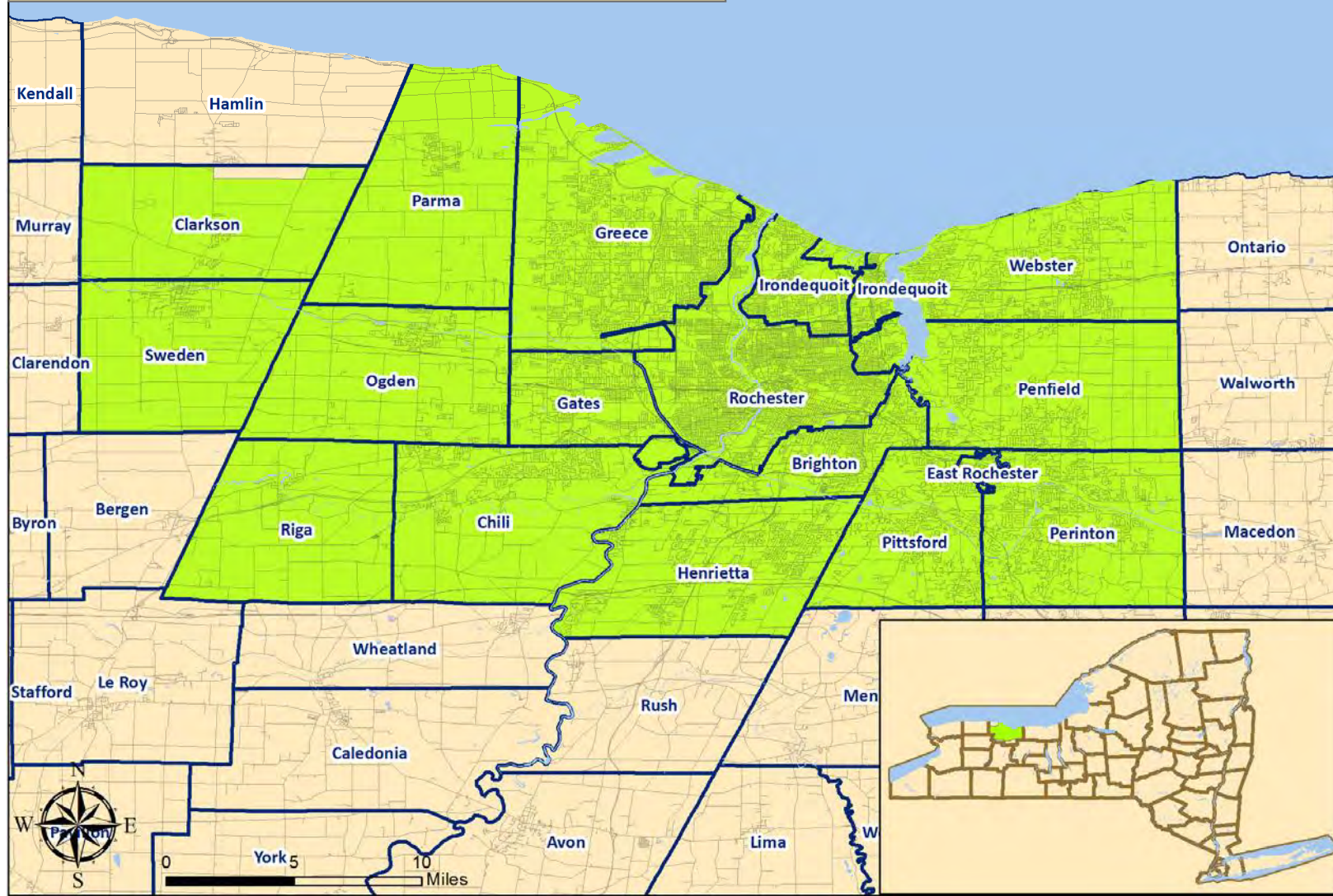
- CC Reform NY 25 is a district drawn for the rural towns and small cities of Western New York, as well as the outer Buffalo suburbs. Agriculture is the most important industry in this area, with Niagara, Genesee, Wyoming, and Chautauqua Counties among the top agricultural producers in the state.
  - o These rural areas have distinct issues and needs from those of the core Buffalo metro region.

### ***Major Demographic Changes:***

- The rural areas of the western Southern Tier experienced significant population decline (Chautauqua, Cattaraugus, and Allegany counties together lost almost 10,000 residents). But overall within the district, the decline was mostly offset by growth in the outer Buffalo suburbs of Erie and Niagara counties.

# Common Cause Reform Plan Congressional District 26

Brian Paul, Common Cause/NY, 12/03/11



## DISTRICT 26 – ROCHESTER REGION

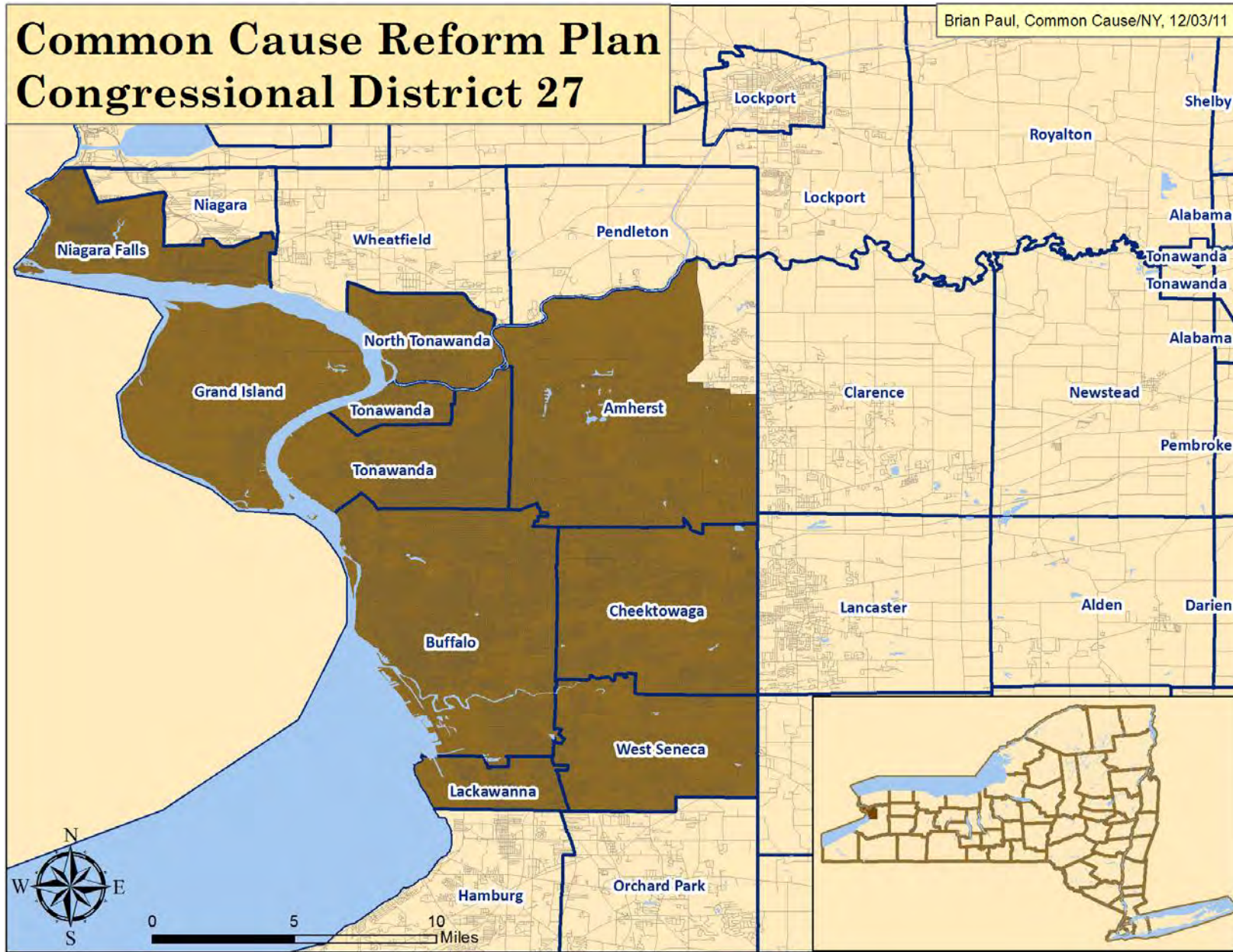
DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
26	717,705	555,527	75.9%	13.2%	3.3%	6.0%

### ***Description and explanation***

- CC Reform NY 26 is a compact district consisting of the City of Rochester and its suburbs. It is entirely within Monroe County, and with only one exception (Clarkson), follows town and city lines.
  - o Rochester is the core of its own regional economy and deeply connected with its surrounding suburbs.

### ***Major Demographic Changes:***

- Monroe County as a whole grew by 1.2% between 2000 and 2010 but the City of Rochester shrunk by 4.2%. This is less of a decline than Buffalo but more than Syracuse.
- Monroe County would have actually lost population and Rochester would have shrunk further if not for major growth in the minority communities. In Monroe County, the Hispanic population grew by 45.8% and the NH Black population by 18.8% between 2000 and 2010.



## DISTRICT 27 – BUFFALO REGION

DIST	POP	VAP	NH White VAP	NH Black VAP	NH Asian VAP	Hispanic VAP
27	717,724	565,593	75.1%	15.9%	3.0%	4.3%

### *Description and explanation*

- CC Reform NY 27 is a compact district consisting of the City of Buffalo and its suburbs. It is mostly within Erie County, crossing into Niagara to include the cities of Niagara Falls and North Tonawanda, and with only one exception (Amherst), follows town and city lines.
  - o Buffalo is the core of its own regional economy and deeply connected with its surrounding suburbs.

### *Major Demographic Changes:*

- The Buffalo region, defined as Erie County and Niagara County, lost 32,920 residents over the past decade, with the overall population declining by 2.8%. The City of Buffalo has lost more than 10% of its population since the last census. A detailed discussion of the demography of the region can be found [here](#).

## *Concerned Citizens of Fort Greene-Clinton Hill*

March 2, 2012

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Dear Judge Mann:

Thank you for this opportunity to comment on the proposed Congressional lines for Brooklyn, and specifically, on the 10<sup>th</sup> Congressional district. The 10<sup>th</sup> Congressional district is a Voting Rights Act district that includes the neighborhoods of Fort Greene, Clinton Hill, Bed-Stuy, Brownsville, East New York and Canarsie. Since the passage of that historic law in 1965, diverse communities in places like New York City have been grouped together in congressional districts to provide the best opportunity for proportional ethnic and racial representation. Here in central Brooklyn, the African-American community benefits from the majority-minority district lines for the 10<sup>th</sup> Congressional district. We write because we are seriously concerned that the district lines recently released upend that history and may defy some of the basic requirements of federal law.

First, this map cracks the Fort Greene and Clinton Hill communities and places parts of each neighborhood in two congressional districts. These two traditionally African-American neighborhoods are really one “community of interest”. They are served by the same community board, the same police precinct, the same school district, the same bus and subway lines, the same firehouses, and the same central commercial corridors on Fulton Street and Myrtle Avenue. The maps released instead move most of the traditionally African-American neighborhood of Fort Greene into a neighboring district to the south. Consistent with the principles of the Voting Rights Act, the neighborhoods of Fort Greene and Clinton Hill should be kept whole and remain entirely within the 10<sup>th</sup> congressional district.

We are also concerned because these same maps also remove Fort Greene’s largest public housing project – the Farragut Houses, again largely African-American – from the 10<sup>th</sup> Congressional district. As a result, residents of Farragut are cast off into the adjacent district to the north, thereby further diluting the African-American presence in the 10<sup>th</sup> Congressional district, separating the Farragut Houses from their traditional community of interest.

Since the bygone era of the crack epidemic of the 80’s when Myrtle Avenue was known as “Murder Avenue,” many of our residents remained in these neighborhoods. We have built a wonderfully diverse community through hard work, perseverance and political cohesion. We need to make sure that the integrity of this district is maintained by keeping the Clinton Hill and Fort Greene communities of interest together. As a district that falls within the Voting Rights Act, and one that has consistently adhered to the “one district, one vote” rule, to break our

community up defies the spirit of the law and a fair redistricting process. It requires immediate redress.

Consequently, we have attached a proposed map for the 10<sup>th</sup> Congressional District that fairly keeps the communities of Fort Greene and Clinton Hill in the 10<sup>th</sup> District and is consistent with the requirements under the 1965 Voting Rights Act.

Thank you,

**Concerned Citizens of Fort Greene-Clinton Hill**

Councilmember Letitia James, District 35

Reverend Clinton M. Miller, Pastor, Brown Memorial Baptist Church

Reverend Linda Bell, St. Lukes Church

Ed Brown, President, Ingersoll Houses

Jamel Gaines, Founder and Artistic Director of Creative Outlet

David Goldsmith, 2<sup>nd</sup> Vice President CEC 13 and District 13 Parent

Delia Hunley-Adossa, President, 88<sup>th</sup> Precinct Council

Lenny Singletary, Active Community Member

Ruth Goldstein, Community Activist

Florence Timothy, Community Activist

Tay and Bernadette Hamilton, 345 Clinton Avenue

Virginia Canady, Ms. Jenny Cares Community Outreach

Annie Stevenson-King, AARP Legislative District Advocacy Coordinator

Laurie Cumbo, Community Leader

Shirley McRae, Community Activist

**district 14**  
**former district 15**

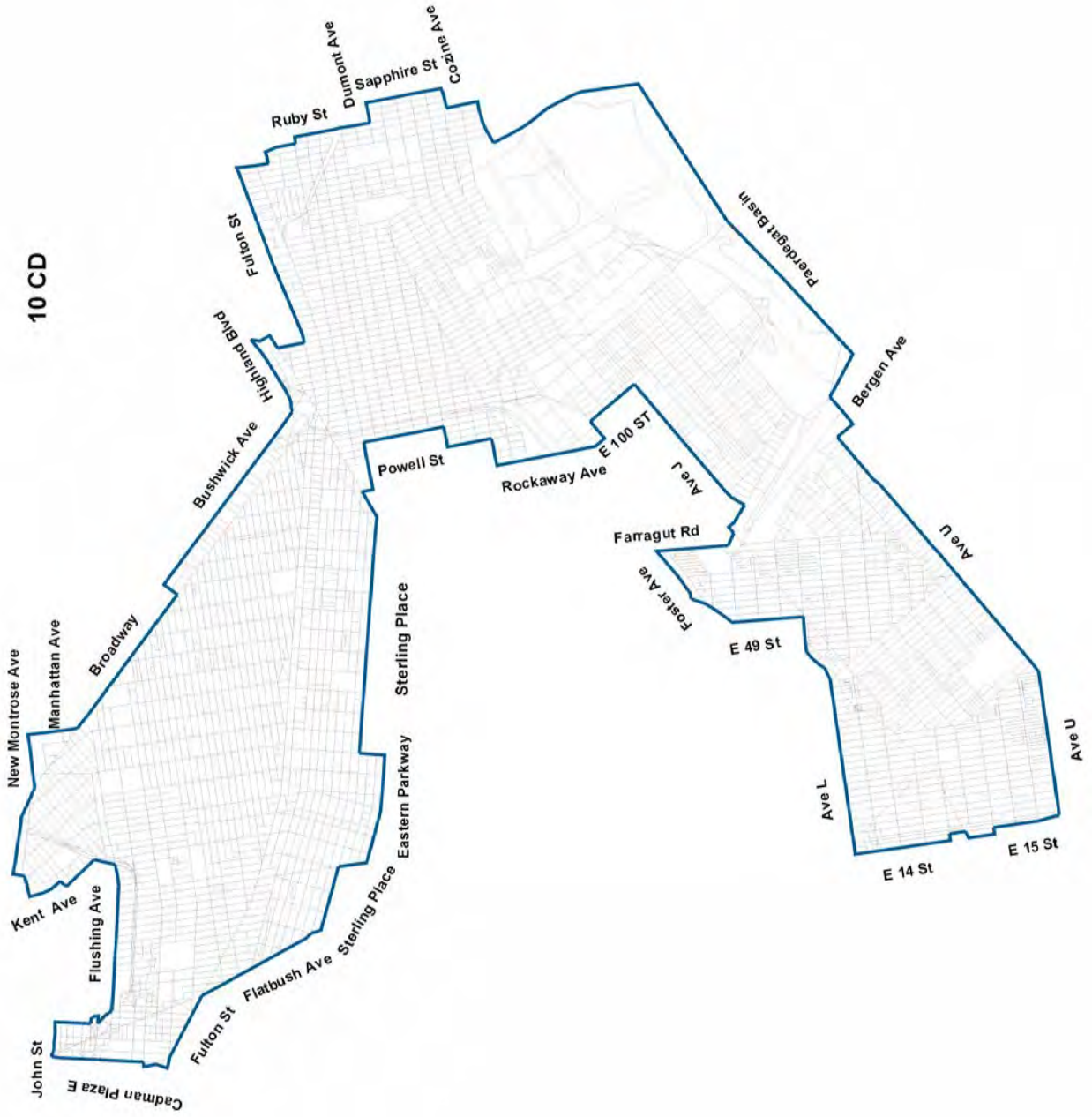
**district 14**  
**census**

CD 14		
Total Population		
All	Pop	%
Tot	721,041	
Wh	81,978	(11.4)
Bl	197,796	(27.4)
Hisp	404,061	(56.0)
Asn	23,266	(3.2)
Nat	1,484	(0.2)
Oth	12,456	(1.7)
Voting Age Pop		
18+	Pop	%
Tot	556,983	
Wh	73,193	(13.1)
Bl	155,110	(27.8)
Hisp	298,777	(53.6)
Asn	19,815	(3.6)
Nat	1,110	(0.2)
Oth	8,976	(1.6)





10 CD



March 6, 2012

Magistrate Judge Roann Mann  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Dear Magistrate Mann:

On behalf of the Center for Urban Research at the Graduate Center of the City University of New York (CUNY), I write to inform you about a freely available online interactive mapping application we have developed that may be of use to you and your staff as you review the various Congressional district proposals that have been submitted. Our online maps may also be helpful for the parties submitting the district proposals themselves.

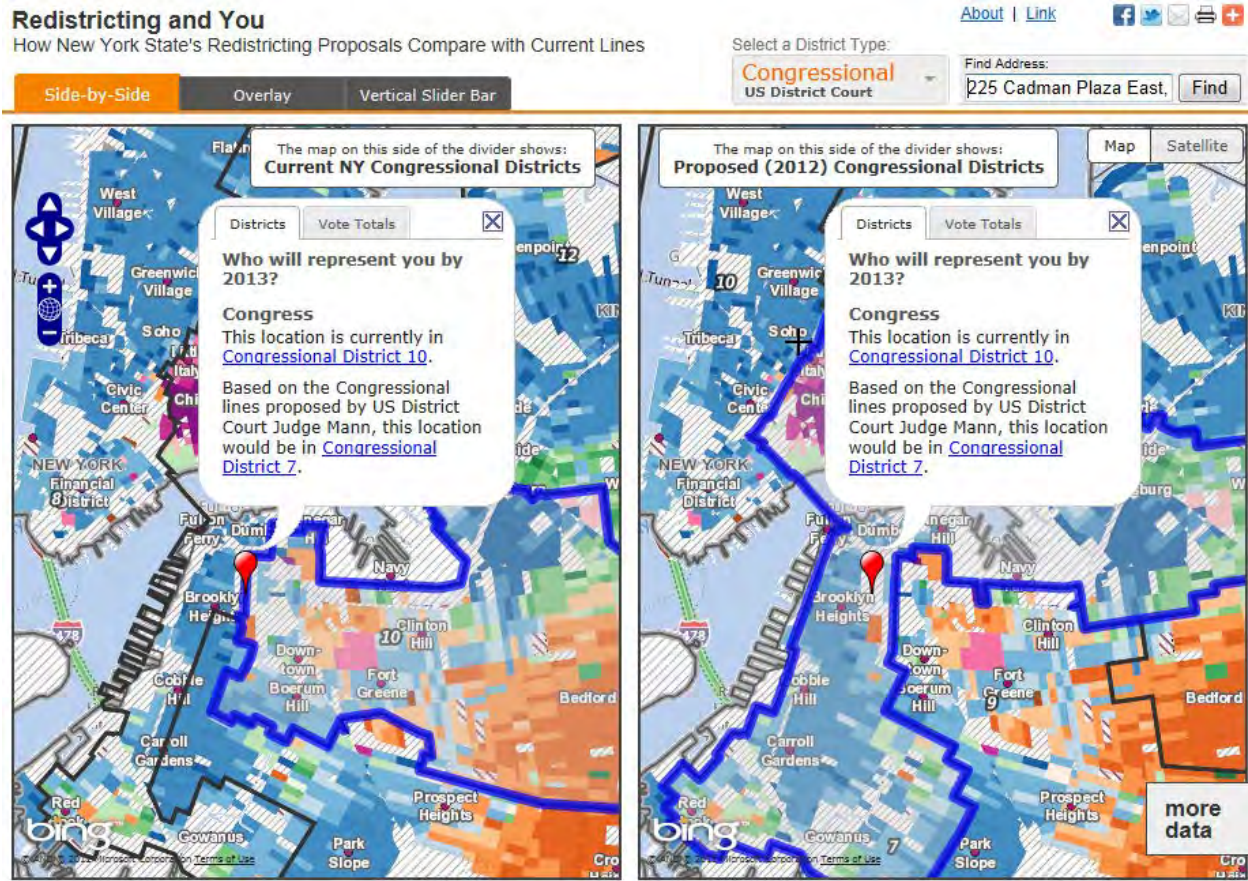
The maps are available at <http://www.urbanresearchmaps.org/nyredistricting/map.html> .

Once you select one of the Congressional district options from the pull-down menu at the top of the page, you will be able to:

- Compare proposed districts with existing Congressional districts throughout the state;
- Zoom in to see in detail how the existing and proposed lines are drawn (you can also change the basemap to display aerial imagery so you can see how the lines are drawn in relation to individual buildings);
- Enter a street address anywhere in the state to zoom to that location;
- Once you type a street address or click on the map, a popup window is displayed that identifies that location's existing district as well as the proposed district that would encompass it;
- When you click the "More Data" tab at the lower right, you can display a block-by-block map of predominant race/ethnicity patterns for a visual indication of how the proposed lines might impact voting power of minority populations; and
- The "More Data" tab also provides access to a map of local voting patterns (based on the 2010 State Senate elections) for an indication of recent voting tendencies within the districts.

For example, this link <http://bit.ly/zZOLqx> (see screenshot on the following page of this letter) takes you directly to the location on the map of the courthouse at 225 Cadman Plaza East, currently in Congressional District 10 (shown on the left). On the right it shows the boundaries

for Congressional District 7 as proposed by the District Court, and on both maps it includes the block-level demographic characteristics within the districts and the surrounding area.



Center for Urban Research, CUNY Graduate Center. In collaboration with The New York World. Map layers hosted by CartoDB

Currently our maps display the proposed districts from your office, Common Cause, and the Senate and Assembly majorities. The maps also display the proposed State Senate and Assembly lines from LATFOR in relation to the existing legislative district boundaries.

I hope you find our mapping application helpful. Please feel free to contact me if you have any questions about it, or if you have suggestions on how we might enhance its usefulness for this process.

Thank you.

Sincerely,

Steven Romalewski  
Director, CUNY Mapping Service  
Center for Urban Research, CUNY Graduate Center

## Narrative for Fortner plan for NY Congressional Districts

I have an interest in creating neutral maps using well-defined criteria. I serve as an Illinois State Representative, and have introduced a number of redistricting reform measures based on neutral principles. I participated in the Ohio Redistricting Competition last summer and was awarded first place. Even though I am a Republican, the Democrats in the Ohio Senate introduced as legislation my plan as their alternative to the plan approved by the Ohio legislature. I recognize this is submitted after the deadline, but my legislative service did not allow an earlier response. Perhaps it will still be of interest to some.

This plan was prepared using a model based on regions made up of whole counties. Each region is equal to a whole number of districts within 0.5% of the ideal district population. Regions are then divided into districts that are nearly made from whole counties. In counties larger than a district, whole districts are placed within the county to the extent possible. To equalize population shifts between districts are made in only one county and are done so as to avoid splitting towns. When towns must be split preference is given to avoid splitting villages or other census designated places.

This plan is prepared at the level of voting districts (VTDs) using Dave's Redistricting App (<http://gardow.com/davebradlee/redistricting/>) and as such cannot provide exact population equality. No district has a deviation greater than 500 persons using census 2010 population. Splitting precincts would allow this plan to have exact population equality with minimal change to the geography or demographics. The csv file included reflects the VTD equivalencies. Maps of the state and the New York City area are included for reference as Figures 1 and 2.

New York City has a population equivalent to 11.4 census districts. According to the New York City department of planning, the 2010 census black and Hispanic voting age populations make up 22.2% and 26.7% of the city respectively. This would correspond to 2.53 and 3.04 districts based on the proportion of the population. With that in mind, this plan provides for three districts with a black voting age majority, and three districts with a Hispanic voting age majority. Population shifts to achieve this required some additional crossing of county lines beyond the minimum needed from geography alone. The demographics of all the districts are in Table 1.

Table 1. Voting age population demographics for Fortner plan for NY Congressional Districts

District	White non-Hispanic VAP%	Black non-Hispanic VAP%	Hispanic VAP%	Asian non-Hispanic VAP%	Other VAP%
CD 01	80.1	4.2	11.1	3.3	1.3
CD 02	66.2	9.3	19.6	2.6	1.3
CD 03	71.2	3.5	9.5	14.3	1.5
CD 04	66.3	12.5	15.6	4.3	1.3
CD 05	43.4	4.4	16.3	33.9	2.0
CD 06	13.3	50.4	17.5	11.4	7.4
CD 07	14.8	7.6	57.2	17.6	2.8
CD 08	55.7	2.5	16.9	23.4	1.5
CD 09	67.1	7.9	13.7	10.0	1.4
CD 10	23.6	50.2	19.4	4.8	2.0
CD 11	30.6	50.3	12.2	4.4	2.5
CD 12	64.2	5.2	11.3	17.1	2.1
CD 13	13.7	28.2	52.1	4.1	1.9
CD 14	54.1	8.7	23.8	11.2	2.1
CD 15	3.4	29.3	63.1	2.5	1.7
CD 16	41.3	29.0	23.3	4.3	2.1
CD 17	67.9	9.1	15.2	6.5	1.3
CD 18	75.7	7.2	13.3	2.2	1.6
CD 19	79.8	9.0	6.1	3.5	1.6
CD 20	90.0	3.7	2.7	1.8	1.7
CD 21	90.2	3.6	3.2	1.3	1.7
CD 22	85.8	6.8	3.1	2.4	1.9
CD 23	88.9	3.2	3.5	2.9	1.5
CD 24	91.6	3.9	2.3	0.8	1.4
CD 25	76.0	13.2	6.0	3.3	1.5
CD 26	93.1	2.5	2.2	0.7	1.6
CD 27	76.5	14.8	4.2	3.1	1.5

Figure 1. Statewide view of Fortner plan

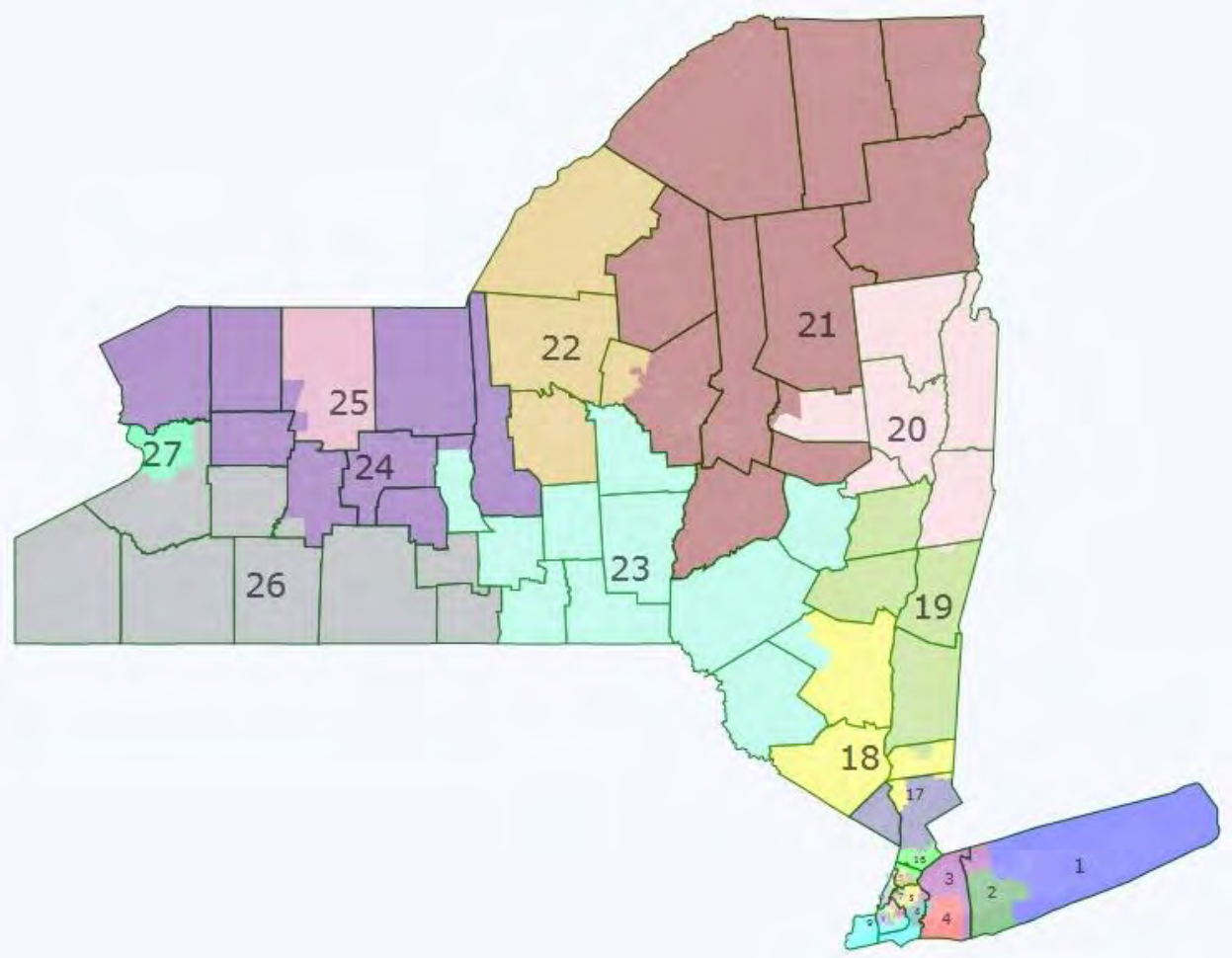


Figure 2. New York City area view of Fortner plan

