

# Orthodox Alliance for Liberty

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March 13, 2012

BY ECF

Honorable Reena Raggi  
United States Circuit Judge

Honorable Gerard E. Lynch  
United States Circuit Judge

Honorable Dora L. Irizarry

United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Objections to Magistrate's Proposed Redistricting of Orthodox Communities  
in Kings, Queens and Nassau counties  
Favors v. Cuomo, No. 1: 1:11-cv-05632-DLI-RR-GEL (E.D.N.Y.)

Honorable Judge Raggi, Honorable Judge Lynch and Honorable Judge Irizarry:

The Court holds the power to influence the next generation of American voters in this case.

I approach the Honorable Court on behalf of an alliance of Orthodox Jewish grass roots advocacy groups based in the New York City area with strong objections to the Special Master's proposed Redistricting Plan.

## **I. ORTHODOX JEWS ARE A RACIAL GROUP PROTECTED BY THE CIVIL RIGHTS ACT**

As we argued in our proposal to Honorable Judge Mann, Orthodox Jews constitute a unique and distinct class of the Hebrew race (commonly known as the Jewish people). Of the larger racial group of Jews in general, Orthodox Jews alone place primary importance on upholding the Torah, which contains rules that have kept the Jews a distinct demographic over the course of millennia.

U.S. Congressional Districts representing Orthodox Jewish communities in the New York City area have been egregiously gerrymandered up until the present date. Natural and complete neighborhoods of Orthodox Jews have been split between as many as five different Congressional districts (such as Midwood and Gravesend, called "Flatbush" by Orthodox Jews).

Natural, neighboring communities of interest have been separated from each other (such as Hollis Hills, Jamaica Estates and Hillcrest being separated from Kew Gardens Hills, Forest Hills and Kew Gardens in Queens; while Far Rockaway and Bayswater are separated from their abutting neighbors in Lawrence, Cedarhurst and Woodmere in Nassau County).

The Honorable Magistrate Judge's Proposed Redistricting Plan does nothing to alleviate this violation of the Civil Rights Act, but actually aggravates the injustice.

## **II. OBJECTIONS TO REDISTRICTING OF ORTHODOX JEWISH COMMUNITIES IN KINGS COUNTY**

New York State is slated to lose two Congressional districts following the Census. By eliminating the seat of Robert Turner, the large Orthodox Jewish neighborhood of Flatbush is broken up and subsumed in neighboring African American communities.

## **III. OBJECTIONS TO REDISTRICTING OF ORTHODOX JEWISH COMMUNITIES IN QUEENS COUNTY**

Jamaica Estates, Hollis Hills and Hillcrest should not be separated from the rest of the Jewish community in adjoining Kew Gardens Hills, Forest Hills and Kew Gardens.

## **IV. OBJECTIONS TO REDISTRICTING OF ORTHODOX JEWISH COMMUNITIES IN NASSAU COUNTY**

Far Rockaway should be included with its natural neighbors in the Five Towns.

We thank the Court for its kind invitation to submit our proposal, and for honorably carrying out its sacred mission to preserve our nation with the rule of law.

Respectfully submitted,

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On Behalf of the Orthodox Alliance for Liberty