

July 2, 2011

Note to the Court

We are grateful that redistricting is now in the hands of the Judiciary. By going to Court we move from a partisan environment to a neutral legal environment. We do not know if The Court will look at all the public Congressional District (CD) proposals posted on the Legislative Website “NELIS,” but we hope that you do (there are only a few public CD proposals to look at).

Our “Grassroots Team” has offered two public CD proposals. Our first proposal, listed as proposal number *three* on NELIS, offers our cleanest boundary lines. There is absolutely no gerrymandering associated with this proposal. However, regarding CD-1, CD-3 and CD-4, these boundary lines are not as politically competitive as they could be. By redrawing our boundary lines *slightly* we can put these three CDs in play. We have done this with our second map, and this should make for three healthy and close elections. In every map, drawn by both political parties, CD-2 in the north will always be a Republican CD.

By following the thrust and guidance of *Abrams v. Johnson*, 521 U.S. 74 (1997), [117 S.Ct. 1925] we were able to use straight clean lines, and for the most part we used main roads and highways for our boundaries. In our second effort, listed as proposal number two on NELIS, we were able to keep all of our CD numbers within 100 people of the target number (675,138).

To investigate the competitiveness of the districts proposed in our second proposal, we determined the distribution of votes between major candidates for Governor and Lieutenant Governor in the 2010 General Election, using the precincts within the proposed districts to extract the data from the Statements of Vote issued by the Secretary of State and the Clark County Election Department. These results are summarized in Tables 1, 2, and 3 for the Governor’s race and in Tables 4, 5, and 6 for the Lieutenant Governor’s race. Tables 1 and 4 cover districts wholly or partially within Clark County, Tables 2 and 5 cover all of Congressional District 4, and Tables 3 and 6 cover all of Congressional District 2, respectively.

As expected, Congressional District 2 voted overwhelmingly for the Republican candidates in both statewide races. The other three districts are competitive. CD 1 and CD 3, both entirely within Clark County, voted Republican by relatively small margins in both races.

The Clark County portion of CD 4 favored Republican Brian Sandoval over Democrat Rory Reid by 0.28% and Republican Brian Krolicki over Democrat Jessica Sferrazza by 2.12%. For all of CD 4, Sandoval won by 6.94% and Krolicki won by 7.00%.

Table 1. 2010 General Election			
<i>Clark County -- Governor</i>			
District	Votes	Reid	Sandoval
CD 1	144135	67821	69997
		47.05%	48.56%
CD 4	149853	71450	71868
		47.68%	47.96%
CD 3	168193	77783	82766
		46.25%	49.21%
County	462180	217054	224631
		46.96%	48.60%

Table 4. 2010 General Election			
<i>Clark County -- Lt. Governor</i>			
District	Votes	Sferrazza	Krolicki
CD 1	140774	62889	68104
		44.67%	48.38%
CD 4	146660	66771	69877
		45.53%	47.65%
CD 3	164735	71999	80896
		43.71%	49.11%
County	452170	201659	218877
		44.60%	48.41%

Table 2. 2010 General Election			
<i>Congressional District 4 -- Governor</i>			
County	Votes	Reid	Sandoval
Esmeralda	386	46	286
Lincoln	1947	380	1381
Mineral	1886	555	1132
Nye	14347	4222	8826
Lyon	4028	649	3166
Douglas	6750	1615	4693
Subtotal	29344	7467	19484
Clark	149853	71450	71868
Total	179197	78917	91352
		44.04%	50.98%

Table 5. 2010 General Election			
<i>Congressional District 4 -- Lt. Governor</i>			
County	Votes	Sferrazza	Krolicki
Esmeralda	382	57	245
Lincoln	1919	385	1257
Mineral	1865	770	880
Nye	14199	4367	8113
Lyon	3976	991	2736
Douglas	6678	1842	4379
Subtotal	29019	8412	17610
Clark	146660	66771	69877
Total	175679	75183	87487
		42.80%	49.80%

Table 3. 2010 General Election			
<i>Congressional District 2 -- Governor</i>			
County	Votes	Reid	Sandoval
Carson City	19492	6676	11512
Churchill	8877	1697	6586
Elko	12829	2194	9489
Eureka	756	76	597
Humboldt	4975	994	3564
Lander	1896	277	1449
Pershing	1731	396	1140
Storey	2091	609	1343
Washoe	139615	52590	80828
White Pine	3258	519	2261
Lyon	14375	3812	9552
Douglas	19413	4733	13503
Total	229308	74573	141824
		32.52%	61.85%

Table 6. 2010 General Election			
<i>Congressional District 2 -- Lt. Governor</i>			
County	Votes	Sferrazza	Krolicki
Carson City	19318	6733	11528
Churchill	8811	2268	5905
Elko	12713	2423	8759
Eureka	754	93	539
Humboldt	4923	1398	3065
Lander	1880	409	1243
Pershing	1719	526	1010
Storey	2090	743	1188
Washoe	138041	60787	70457
White Pine	3229	760	1986
Lyon	14215	4394	8772
Douglas	19210	5134	12945
Total	226903	85668	127397
		37.76%	56.15%

Also, our CD-3 and CD-4 give minorities very good numbers and a chance to prevail in the 2012 General Election; and we have done this without gerrymandering the boundary lines. If The Court compares our two proposals with any other public or legislative proposals, you will see a startling difference. All the other CD maps make it difficult for the voting public, who live along the boundary lines, to figure out what CD they reside in. In many cases these other maps look like blowups of runaway cancer cells. The difference in the looks of these competing CD boundary lines is the result of which U.S. Supreme Court case, or cases, you chose to follow. We followed and gave allegiance to the recent decisions of *Abrams*, and *Shaw v. Reno*, 509 U.S. 630 (1993), while everyone else thought *Karcher v. Daggett*, 462 U.S. 725 (1983) was more important.