

FILED UNDER THE ELECTRONIC BRIEFING RULES

SUPREME COURT
OF THE
STATE OF CONNECTICUT

S.C. 20661

**IN RE PETITION OF
REAPPORTIONMENT COMMISSION, EX REL.**

SUBSTITUTE BRIEF WITH CORRECTED MAP SUBMITTED TO
THE SPECIAL MASTER BY THE REPUBLICAN MEMBERS OF
THE CONNECTICUT REAPPORTIONMENT COMMISSION ON
THE CONGRESSIONAL REDISTRICTING PROCESS

SENATOR KEVIN KELLY (CO-CHAIR)
REPRESENTATIVE VINCENT CANDELORA
SENATOR PAUL FORMICA
REPRESENTATIVE JASON PERILLO

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NATURE OF THE PROCEEDINGS

Article Third, § 6 of the Connecticut Constitution requires a decennial reapportionment of General Assembly and Congressional districts. Article Third, § 6b provides that, if the General Assembly is unable to adopt a redistricting plan by September 15th, the Governor must appoint a Commission designated by the president pro tempore of the senate, the speaker of the house of representatives, the minority leader of the senate and the minority leader of the house of representatives, each of whom shall designate two members of the commission. The eight members of the Commission then designate an elector to serve as a ninth member. In accordance with these provisions, the Governor appointed the Commission to devise a reapportionment plan in accordance with the 2020 census data. The Commission members are: Senator Kevin Kelly, Co-Chair, Senator Martin Looney, Senator Bob Duff, Senator Paul Formica, Representative Matthew Ritter, Co-Chair, Representative Vincent Candelora, Representative Jason Rojas, Representative Jason Perillo and John McKinney.

Article third, § 6c of the state constitution requires the Commission to submit a plan of districting for congressional districts to the Secretary of the State by November 30, 2021. By statute, the deadline for the federal government to send census data to the states was April 1. However, due to delays in counting and processing the census data, the federal government did not release the census data to the states until August 12, 2021. Despite the over four-month delay in receiving the census data, the Commission was able to agree on and timely submit a districting plan for state House and Senate seats. The Commission was unable to submit a congressional districting plan by November 30, 2021. The Secretary of the State certified that fact to the Chief Justice as required by the state constitution.

Article Third, § 6d vests original jurisdiction in the Supreme Court if a redistricting plan is not filed by November 30th and a registered voter files a petition with the Court. The constitutional provision grants the Court broad authority to take steps to effectuate a redistricting plan, but it must ensure that a plan is filed with the Secretary of the State by February 15th.

On December 2, 2021, the members of the Commission, as registered voters, filed a petition with the Court, requesting that the matter be remanded to the Commission to permit consideration of congressional redistricting until December 21, 2021. On December 6, 2021, the Court issued an order scheduling a hearing on the Commission's petition on December 9, 2021. The order asked counsel for the Commission to be prepared to address the following:

1. The status of the commission's consideration of the alteration of the state's congressional districts;
2. The commission's views on the following: (a) whether the court should appoint a special master to assist the court in this matter; (b) if so, the factors to be considered in appointing a special master; (c) the process and procedures to be employed by the special master; (d) the scope of the duties of the special master; (e) the legal and policy parameters governing the redistricting map to be proposed by the special master; and (f) any other matters deemed relevant by the commission;
3. An interim report detailing the progress of the alteration of the congressional districts.

S.C. Order (12/6/21).

At the hearing, the assistant attorney general representing the Commission reported on the status of the Commission's consideration of a congressional map. The assistant attorney general did not make

any representations on behalf of the Commission as to the second paragraph of the Court's order.

After the hearing, the Court granted the requested extension but ordered that an interim report be filed by December 15, 2021, which was to include the names of three individuals the Commission would propose to serve as a special master for the Court should a map not be adopted by December 21. On December 15, 2021, the Commission filed its interim report stating that it was continuing to work on reaching an agreement on congressional districting and requesting that the time to propose special masters be extended until the December 21st deadline. On December 16, 2021, the Court granted the Commission's request.

On December 21, 2021, the Commission reported that, "[a]lthough the Commission members continue to discuss proposals that have been exchanged, and will continue to do so even if this Court appoints a special master, the Commission members agree that the matter should now return to this Court in accordance with the provisions of article third, § 6 of the Connecticut constitution, as amended."

On December 23, 2021, the Supreme Court issued an order appointing and directing a special master. The order to the special master stated:

In developing a plan, Special Master Persily shall modify the existing congressional districts only to the extent reasonably required to comply with the following applicable legal requirements:

- a. Districts shall be as equal in population as practicable;
- b. Districts shall be made of contiguous territory;

c. The plan shall comply with the Voting Rights Act of 1965, as amended, 52 U.S.C. § 10101 et seq., and any other applicable federal law.

In drafting his plan, Special Master Persily shall not consider either residency of incumbents or potential candidates or other political data, such as party registration statistics or election returns.

In no event shall the plan be substantially less compact than the existing congressional districts, and in no event shall the plan substantially violate town lines more than the existing congressional districts.

S.C. Order (12/23/21).

Later that same day, the Republican members of the Connecticut Reapportionment Commission filed a motion for reconsideration of the Court's order seeking, *inter alia*, an opportunity to brief and argue that the map should be drawn based on traditional redistricting principles rather than the least change standard that was set forth in the Court's order. On December 28, 2021, the Court denied the motion for reconsideration. Later that same day, the Court scheduled a public virtual hearing for January 7, 2022 before the special master.

In accordance with the Court's December 23rd and 28th orders, the Republican Members of the Reapportionment Commission hereby submit to the special master their proposed Congressional redistricting map.

STATEMENT OF FACTS

Based on the 2020 census data, Connecticut's total population is 3,605,944. This is an increase from the 2010 census data, which reported a population of 3,366,474. The 2020 census data creates a target

population of 721,189 people for each of Connecticut's five congressional districts.

I. THE REPUBLICAN MEMBERS' PROPOSED MAP COMPLIES WITH THE COURT'S DECEMBER 23rd ORDER

As required by the Court's December 23rd order, the Republican members' proposed map modifies the existing congressional districts only to the extent necessary to comply with considerations of population equality, contiguity, and the Voting Rights Act and applicable federal law.

A. Modify the existing congressional districts only to the extent reasonably required

The overall changes to the congressional districts in the Republican members' proposed map are minimal, with an average of 96.5% retention:

- First District: 94.3%
- Second District: 96.8%
- Third District: 98.1%
- Fourth District: 100%
- Fifth District: 95.8%

The proposed map used the existing congressional line as a basis for drawing the revised lines. Due to the uneven distribution of population growth and decline, adjustments are necessary and not evenly distributed.

District	Total Persons	Ideal	Difference	Percentage
1	717654	721,189	-3,535	-0.5%
2	699901	721,189	-21,288	-3.0%
3	715360	721,189	-5,829	-0.8%
4	746816	721,189	25,627	3.6%
5	726213	721,189	5,024	0.7%
Total	3605944			

Growth in the Fourth District and a decline in the Second District necessitate changes to the districts in between them, the First District, Third District, and Fifth District. Overall, the proposed map has a retention rate of 96.5%. This means that, on average, only 3.5% of residents will be located in a different Congressional district.

As a result of this growth, the Fourth District only needs to shed excess population and not gain any new population. This results in a 100% retention for this district. Because of population decline, the Second District will need to gain additional population, resulting in a greater rate of change for a 96.8% retention. Because of their geography and population, the retention rates for the Fourth District and the Second District will be the same under any least change proposal. Retention rates for the remaining three districts are directly impacted by the need to shift population between the two ends of the state.

B. Districts shall be as equal in population as practicable

Based on the 2020 census, the target population for each of the five congressional districts is 721,189. The Republican members' map distributes the population among the five districts as follows:

- First District: 721,188 (-1)
- Second District: 721,190 (1)
- Third District: 721,189 (0)

- Fourth District: 721,189 (0)
- Fifth District: 721,188 (-1)

This map proposal achieves 0% deviation between all five congressional districts. In this proposed map all districts are within one person. The most populated district contains 721,190 total persons and the least populated district contains 721,188 total persons. The Republican members' map achieves population equality as closely as practicable.

C. Districts shall be made of contiguous territories

All of the districts in the Republican members' proposed map are contiguous.

D. The plan shall comply with the Voting Rights Act of 1965, as amended, 52 U.S.C. § 10101 et seq., and any other applicable federal law

The Republican members' proposed map does not substantially alter the existing percentages of minority voting age populations.

District	Existing Map Racial Demographics VAP				Proposed Map Racial Demographic VAP				Difference Racial Demographic VAP			
	White	Black	Hispanic	Minority	White	Black	Hispanic	Minority	White	Black	Hispanic	Minority
1	63.87%	14.74%	15.32%	36.13%	63.08%	15.33%	15.54%	36.92%	-0.79%	0.59%	0.22%	0.79%
2	82.27%	4.00%	7.81%	17.73%	82.33%	3.93%	7.70%	17.67%	0.06%	-0.07%	-0.11%	-0.06%
3	66.91%	13.61%	14.44%	33.09%	66.74%	13.41%	15.09%	33.26%	-0.17%	-0.20%	0.65%	0.17%
4	63.13%	11.73%	19.46%	36.87%	62.45%	11.99%	19.85%	37.55%	-0.68%	0.26%	0.39%	0.68%
5	70.72%	7.11%	17.95%	29.28%	71.75%	6.70%	17.19%	28.25%	1.03%	-0.41%	-0.76%	-1.03%

E. The plan shall not be substantially less compact than the existing congressional districts

The Republican members' proposed map is not substantially less compact than the existing.

District	Current Map					Joint Republican Congressional Map Proposal					Difference				
	Pols by-Pop per	Schwartz berg	Reo ck	Leng th-Widt h	Con vex Hull	Pols by-Pop per	Schwartz berg	Reo ck	Leng th-Widt h	Con vex Hull	Pols by-Pop per	Schwartz berg	Reo ck	Leng th-Widt h	Con vex Hull
1	0.18	0.42	0.44	1.48	0.67	0.16	0.4	0.38	1.31	0.66	-0.02	-0.02	-0.06	-0.17	-0.01
2	0.44	0.66	0.57	1.26	0.84	0.42	0.64	0.58	1.26	0.85	-0.02	-0.02	0.01	0	0.01
3	0.2	0.45	0.36	1.34	0.68	0.22	0.47	0.44	1.38	0.72	0.02	0.02	0.08	0.04	0.04
4	0.32	0.57	0.33	1.22	0.7	0.3	0.55	0.32	1.21	0.7	-0.02	-0.02	-0.01	-0.01	0
5	0.23	0.48	0.54	1.09	0.75	0.24	0.49	0.55	1.09	0.77	0.01	0.01	0.01	0	0.02

F. The plan shall not substantially violate town lines more than the existing congressional districts

The current congressional map has five town splits. The Republican members' proposed map reduces the number of town splits to four, maintaining existing splits in Glastonbury, Middletown, Shelton, and Waterbury.

Moreover, the Republican members' proposed map follows the lines enacted in the adopted House and Senate plans. Town splits were arranged to reduce the creation of unnecessary voting districts. Where

possible, newly enacted state house and state senate lines were incorporated into this proposal. As a matter of election administration, this particular concern was raised by multiple towns and in written testimony at hearings before the Reapportionment Committee. To the extent possible, the enacted lines should be followed, as the Republican members' proposed map does.

II. THE CONGRESSIONAL MAP SHOULD BE DRAWN BASED ON TRADITIONAL REDISTRICTING PRINCIPLES

Notwithstanding the foregoing, and in order to preserve the issue, the Republican members reiterate their contention that the congressional map should be drawn based on traditional redistricting principles. The U. S. Supreme Court has described traditional redistricting principles to include compactness, contiguity, conformity to political subdivisions, and respect for communities of interest. *See Bush v. Vera*, 517 U.S. 952, 959-960 ((1996); *Miller v. Johnson*, 515 U.S. 900, 919-920 (1995). The current congressional map, which was adopted in 2001 and subjected to only minimal changes in 2012, does not honor the principles of compactness or communities of interests. The “lobster claw” that makes up the First District proves the point. *See Shaw v. Reno*, 509 U.S. 630, 647 (1993) (“reapportionment is one area in which appearances do matter.”).

The history of the “lobster claw” goes back to a political gerrymander designed to provide two incumbent members of Congress the opportunity to run for re-election. Based on the 2000 census results, Connecticut’s congressional delegation was reduced from six to five. The members of the 2001 Reapportionment Commission produced a map that would allow representatives from the Fifth District, a resident of Danbury, and from the dissolved Sixth District, a resident

of New Britain, to run against each other for the newly-redrawn Fifth District seat. This created the First District's bizarre shape, which fails to comport with traditional redistricting principles. The Republican members submit that a map based on traditional redistricting principles, referred to by the Stanford Redistricting Project as a "good government" map, would be more fair and representative of the Connecticut electorate than the "least change" map called for in the Court's December 23, 2021 order. See <https://drawcongress.org/state/connecticut/>.

In sum, while the Republican members have a proposed a map that fully comports with the Supreme Court's directives on the standards that the special master should apply in drawing the congressional districts, they respectfully request that the special master also recommend to the Court that it consider a "good government" map for the 2022 redistricting.

CONCLUSION

The special master should recommend adoption of the Republican members' proposed "least change" map because it is in accord with the Supreme Court's December 23, 2021 order. Additionally, the special master should also recommend to the Court that it reconsider its directive and allow for the drafting of a congressional "good government" map based on a traditional redistricting principles.

Respectfully submitted,

REPUBLICAN MEMBERS OF THE
REAPPORTIONMENT
COMMISSION

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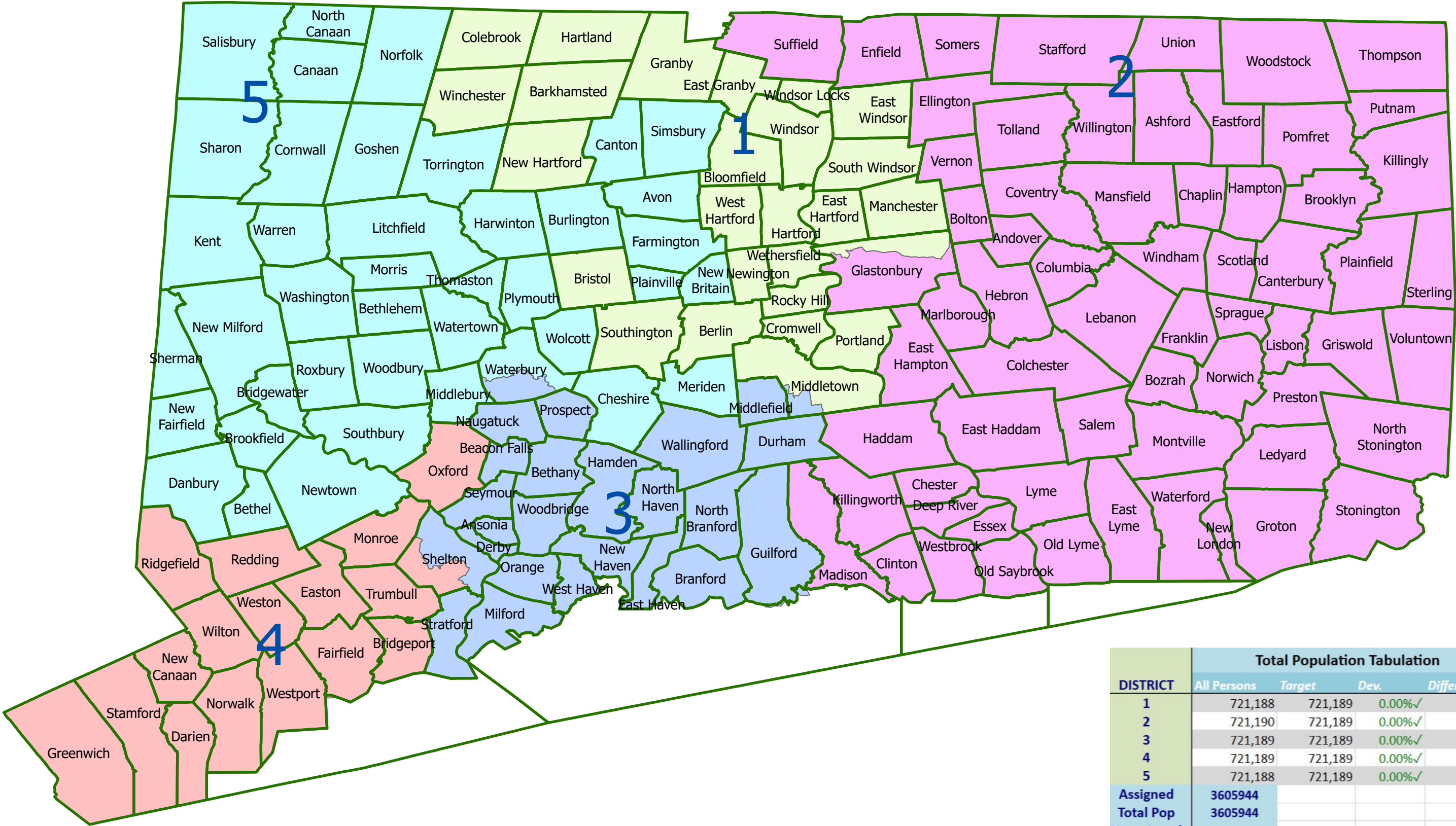
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APPENDIX

SENATOR KEVIN KELLY (CO-CHAIR)
REPRESENTATIVE VINCENT CANDELORA
SENATOR PAUL FORMICA
REPRESENTATIVE JASON PERILLO

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District	Total Persons	Ideal	Difference	Percentage
1	717654	721,189	-3,535	-0.5%
2	699901	721,189	-21,288	-3.0%
3	715360	721,189	-5,829	-0.8%
4	746816	721,189	25,627	3.6%
5	726213	721,189	5,024	0.7%
Total	3605944			

District	Total Persons	Ideal	Difference	Percentage
1	721188	721,189	-1	0.0%
2	721190	721,189	1	0.0%
3	721189	721,189	0	0.0%
4	721189	721,189	0	0.0%
5	721188	721,189	-1	0.0%
Total	3605944			

Autobound EDGE - Compactness Report

Plan Name: Congressional:Current Congressional Map

[For more information on compactness calculations Click Here](#)



Compactness measure: Polsby-Popper

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	695	223	3,953	93	0.18
2	2,103	245	4,790	163	0.44
3	497	177	2,493	79	0.20
4	544	145	1,684	83	0.32
5	1,282	267	5,666	127	0.23

Most Compact: 0.44 For District: 2

Least Compact: 0.18 For District: 1

Compactness measure: Schwartzberg

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	695	223	3,953	93	0.42
2	2,103	245	4,790	163	0.66
3	497	177	2,493	79	0.45
4	544	145	1,684	83	0.57
5	1,282	267	5,666	127	0.48

Most Compact: 0.66 For District: 2

Least Compact: 0.42 For District: 1

Compactness measure: Reock Score

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	695	223	3,953	93	0.44
2	2,103	245	4,790	163	0.57
3	497	177	2,493	79	0.36
4	544	145	1,684	83	0.33
5	1,282	267	5,666	127	0.54

Most Compact: 0.57 For District: 2

Least Compact: 0.33 For District: 4

Compactness measure: Length-Width

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	695	223	3,953	93	1.48
2	2,103	245	4,790	163	1.26
3	497	177	2,493	79	1.34
4	544	145	1,684	83	1.22
5	1,282	267	5,666	127	1.09

Most Compact: 1.48 For District: 1

Least Compact: 1.09 For District: 5

Compactness measure: Convex Hull

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
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Autobound EDGE - Compactness Report

Plan Name: Congressional:Current Congressional Map

[For more information on compactness calculations Click Here](#)



1	695	223	3,953	93	0.67
2	2,103	245	4,790	163	0.84
3	497	177	2,493	79	0.68
4	544	145	1,684	83	0.70
5	1,282	267	5,666	127	0.75

Most Compact: 0.84 For District: 2

Least Compact: 0.67 For District: 1

Autobound EDGE - Compactness Report

Plan Name: Congressional:Joint Republican Congressional Map Proposal

[For more information on compactness calculations Click Here](#)



Compactness measure: Polsby-Popper

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	666	227	4,101	91	0.16
2	2,133	254	5,128	164	0.42
3	487	165	2,180	78	0.22
4	526	147	1,731	81	0.30
5	1,311	265	5,571	128	0.24

Most Compact: 0.42 For District: 2

Least Compact: 0.16 For District: 1

Compactness measure: Schwartzberg

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	666	227	4,101	91	0.40
2	2,133	254	5,128	164	0.64
3	487	165	2,180	78	0.47
4	526	147	1,731	81	0.55
5	1,311	265	5,571	128	0.49

Most Compact: 0.64 For District: 2

Least Compact: 0.4 For District: 1

Compactness measure: Reock Score

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	666	227	4,101	91	0.38
2	2,133	254	5,128	164	0.58
3	487	165	2,180	78	0.44
4	526	147	1,731	81	0.32
5	1,311	265	5,571	128	0.55

Most Compact: 0.58 For District: 2

Least Compact: 0.32 For District: 4

Compactness measure: Length-Width

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
1	666	227	4,101	91	1.31
2	2,133	254	5,128	164	1.26
3	487	165	2,180	78	1.38
4	526	147	1,731	81	1.21
5	1,311	265	5,571	128	1.09

Most Compact: 1.38 For District: 3

Least Compact: 1.09 For District: 5

Compactness measure: Convex Hull

District	District Area (SQM)	Perimeter (Miles)	Area of Circle with Same Perimeter	Perimeter of Circle with Same Area	Compactness Value
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Autobound EDGE - Compactness Report

Plan Name: Congressional:Joint Republican Congressional Map Proposal

[For more information on compactness calculations Click Here](#)



1	666	227	4,101	91	0.66
2	2,133	254	5,128	164	0.85
3	487	165	2,180	78	0.72
4	526	147	1,731	81	0.70
5	1,311	265	5,571	128	0.77

Most Compact: 0.85 For District: 2

Least Compact: 0.66 For District: 1

District	Current Map					Joint Republican Congressional Map Proposal					Difference				
	Polsby-Popper	Schwartzberg	Reock	Length-Width	Convex Hull	Polsby-Popper	Schwartzberg	Reock	Length-Width	Convex Hull	Polsby-Popper	Schwartzberg	Reock	Length-Width	Convex Hull
1	0.18	0.42	0.44	1.48	0.67	0.16	0.4	0.38	1.31	0.66	-0.02	-0.02	-0.06	-0.17	-0.01
2	0.44	0.66	0.57	1.26	0.84	0.42	0.64	0.58	1.26	0.85	-0.02	-0.02	0.01	0	0.01
3	0.2	0.45	0.36	1.34	0.68	0.22	0.47	0.44	1.38	0.72	0.02	0.02	0.08	0.04	0.04
4	0.32	0.57	0.33	1.22	0.7	0.3	0.55	0.32	1.21	0.7	-0.02	-0.02	-0.01	-0.01	0
5	0.23	0.48	0.54	1.09	0.75	0.24	0.49	0.55	1.09	0.77	0.01	0.01	0.01	0	0.02

District	Existing Map Racial Demographics VAP				Proposed Map Racial Demographic VAP				Difference Racial Demographic VAP			
	White	Black	Hispanic	Minority	White	Black	Hispanic	Minority	White	Black	Hispanic	Minority
1	63.87%	14.74%	15.32%	36.13%	63.08%	15.33%	15.54%	36.92%	-0.79%	0.59%	0.22%	0.79%
2	82.27%	4.00%	7.81%	17.73%	82.33%	3.93%	7.70%	17.67%	0.06%	-0.07%	-0.11%	-0.06%
3	66.91%	13.61%	14.44%	33.09%	66.74%	13.41%	15.09%	33.26%	-0.17%	-0.20%	0.65%	0.17%
4	63.13%	11.73%	19.46%	36.87%	62.45%	11.99%	19.85%	37.55%	-0.68%	0.26%	0.39%	0.68%
5	70.72%	7.11%	17.95%	29.28%	71.75%	6.70%	17.19%	28.25%	1.03%	-0.41%	-0.76%	-1.03%

District	Retention
1	94.3%
2	96.8%
3	93.7%
4	100.0%
5	97.9%
Average	96.5%

The Torrington Registrars of Voters have strong concerns regarding the upcoming redistricting of our state and its possible effect on the City of Torrington. They want to ensure that our town's new district layout is less complicated, more manageable and enhances rather than diminishes our residents' voting experience.

The 2012 redistricting of our state left Torrington as one of the most divided towns in the state. We have two Congressional districts, two senatorial districts, three assembly districts and eight separate polling places ranging in size from 400 to 8,000 voters. Our voters are often confused. While we can't argue the fact that having more representation for our town is beneficial for all, the complicated layout lines currently in place leave constituents wondering who their representatives even are!

I've enclosed a copy of our voter summary for each polling place. If you consider Districts 3, 4, 6, and 7, you will note that there are very few voters in these districts compared to the others. However, these small districts require the same full staff of poll workers, i.e., moderator, two assistant registrars, ballot clerk, tabulator tender, and checkers. This is costly to a fiscally and economically distressed municipality, which Torrington is. Also, it is very difficult to find enough suitable polling places. Having two polls at one site gets complicated and confusing, especially in a double primary.

In light of the budgeting, staffing, location and voter confusion issues, the Torrington Registrars of Voters hereby request that our extremely small polling places be eliminated. If possible, they would like to meet with you before you draw new district boundary lines and offer their insight for the good of all the voters in the City of Torrington.

Thank you for the work that you are doing and thank you for considering this request. We look forward to hearing from you soon.

Sincerely yours,

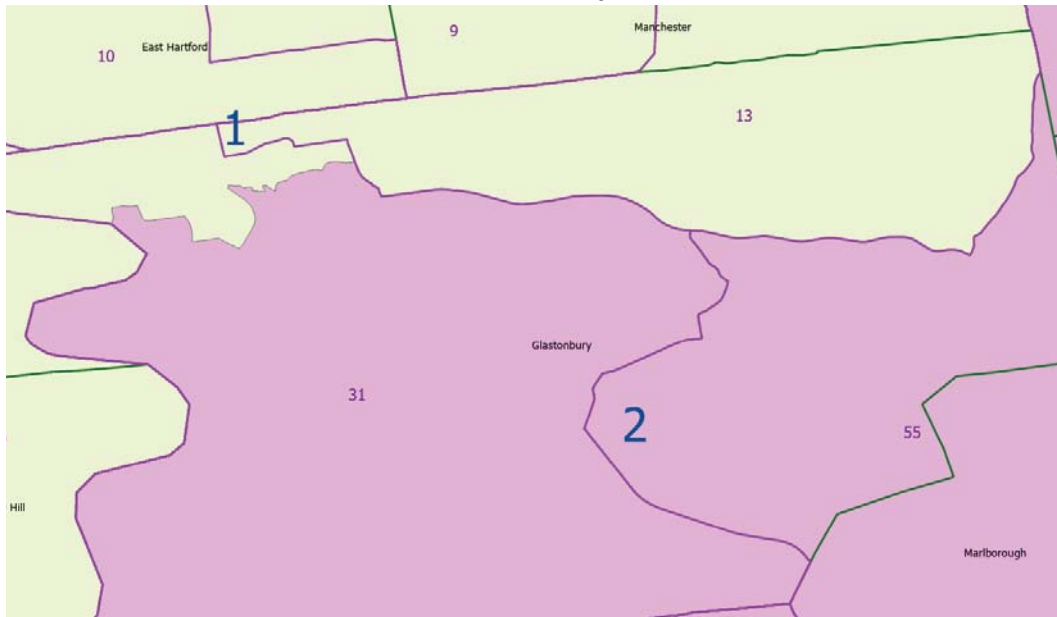
Nan Gallicchio
Registrar of Voters Clerk

**TOWN OF TORRINGTON- VOTER REGISTRATION SUMMARY
STATE DISTRICTS - ALL**

CON : 001,005 - SEN : 008,030 - ASY : 063,064,065 - STATUS : A - ENROLLMENT : ALL

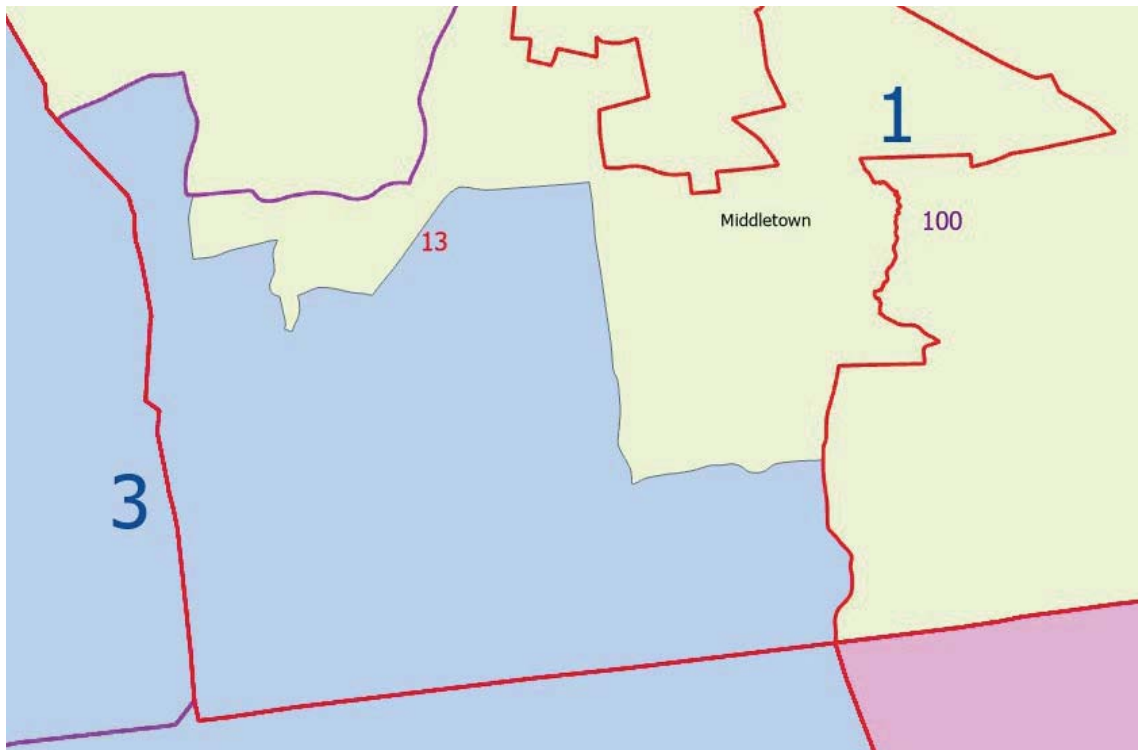
DISTRICT	PRECINCT	DEMOCRATIC	REPUBLICAN	UNAFFILIATED	OTHER	TOTAL
001	00	1426	1508	2192	88	5214
002	00	496	648	793	42	1979
003	00	131	82	178	9	400
004	00	119	113	206	9	447
005	00	761	681	1126	59	2627
006	00	193	242	358	12	805
007	00	199	163	280	6	648
008	00	2440	1958	3458	192	8048
TOTAL :		5765	5395	8591	417	20168

Glastonbury



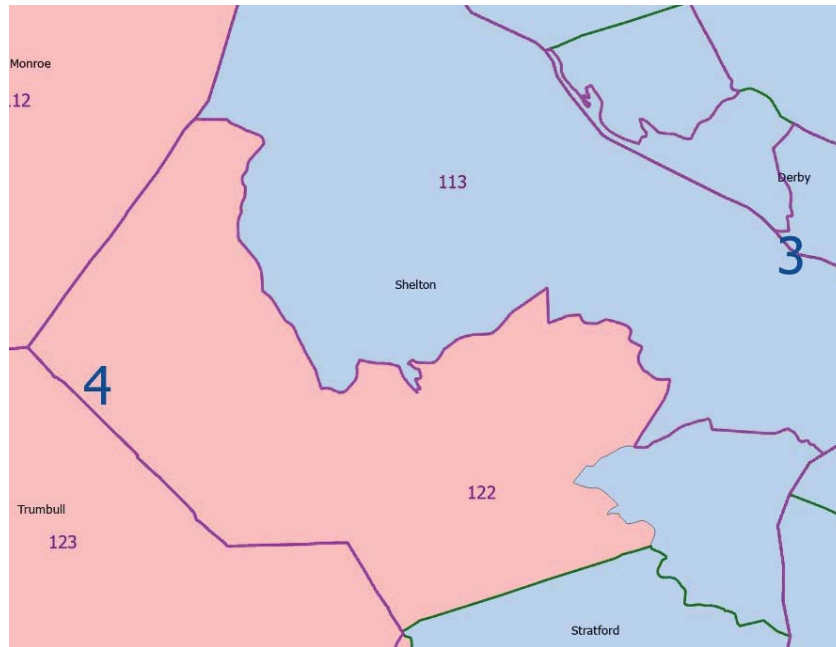
The proposed 2nd Congressional District line follows southern boundary of the recently enacted 13th General Assembly District where possible.

Middletown



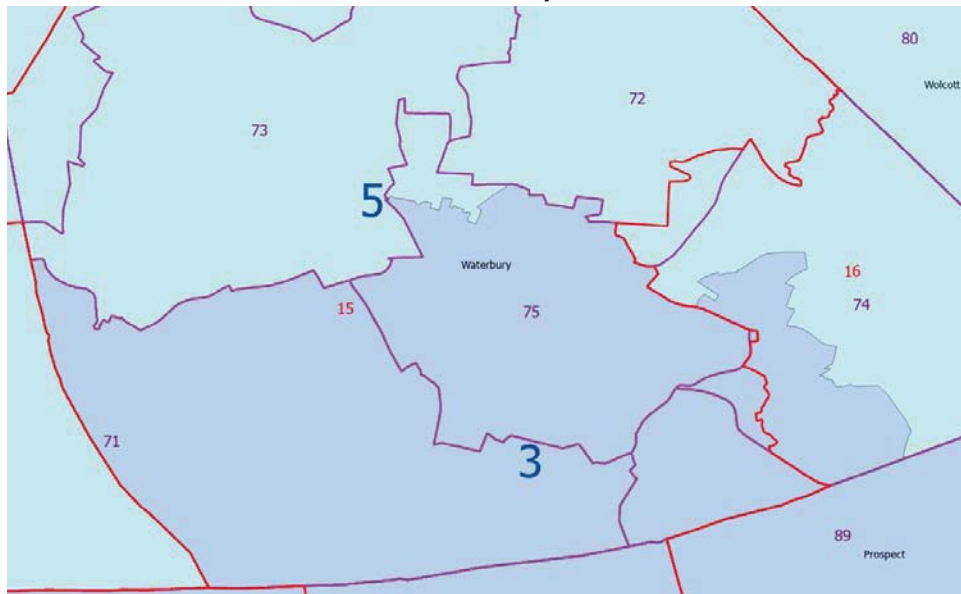
The proposed 3rd Congressional District line stays within the southern boundary of the recently enacted 33rd General Assembly District, and the eastern boundary of the 13th State Senate District. This region of Middletown currently has town voting districts, the proposed map would not add a new voting district.

Shelton



The proposed 3rd District boundary follows the recently enacted 113th General Assembly District boundary to the extent possible. The region south of the line in the 122nd General Assembly District is currently divided into two voting districts, the proposed map would not add a new voting district.

Waterbury



The proposed 3rd District line follows the northern boundaries of the recently enacted 71st and 75th General Assembly Districts where possible. The 74th General Assembly District and 75th District include several voting districts, this proposed congressional boundary would not result in additional voting districts.

CERTIFICATION

The undersigned attorney hereby certifies, pursuant to Connecticut Rule of Appellate Procedure § 67-2, that:

(1) the e-brief with appendix complies with all provisions of this rule;

(2) the e-brief with appendix is filed in compliance with the optional e-briefing guidelines and no deviations were requested

(3) this e-brief contains 2,628 words;

(4) the e-brief with appendix has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order or case law;

(5) the e-brief with appendix has been delivered electronically to the last known e-mail address of each counsel of record for whom an e-mail address has been provided.

/s/ Proloy K. Das
Proloy K. Das, Esq.