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- 1. Complaint (redacted)
 - UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Plaintiff, Pro Se

-v-

State of Connecticut
c/o Secretary of the State
450 Columbus Blvd
Hartford, CT 06103
and

Connecticut Reapportionment Commission
c/o Office of Legislative Management
State Capitol
Hartford, CT 06106
Defendants.

Case No.: [To be assigned by the Court]

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND DAMAGES

- INTRODUCTION

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1. Plaintiff, [redacted], a registered voter in Connecticut, brings this action pro se to challenge the constitutionality of the 2020 congressional district maps, seeking fair representation for all voters.

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2. This lawsuit seeks declaratory and injunctive relief to invalidate the current congressional district maps adopted following the 2020 census, compensatory damages to be

determined, and a precedent to compel fair redistricting.

- JURISDICTION AND VENUE

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3. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question jurisdiction) due to claims arising under the U.S. Constitution and 42 U.S.C. § 1983 for deprivation of rights under color of state law. This includes potential violations of the Voting Rights Act due to vote dilution within diverse voter blocs.

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4. Venue is proper in this District under 28 U.S.C. § 1391(b)(1) as Defendants reside in Connecticut, and the events giving rise to this claim occurred here.

- PARTIES

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5. Plaintiff [redacted] is a citizen of the United States and a resident of [redacted], Connecticut, registered to vote, and directly affected by the challenged redistricting. Plaintiff resides in [redacted], where his votes have been consistently nullified by the current map's design, causing direct harm.

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6. Defendant State of Connecticut, through its Secretary of the State, oversees election administration and redistricting compliance under Conn. Gen. Stat. § 9-3.

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7. Defendant Connecticut Reapportionment Commission is responsible for drawing congressional and state legislative districts pursuant to Conn. Const. Art. VI, § 4.

- FACTUAL ALLEGATIONS

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8. Following the 2020 census, Connecticut retained five congressional seats, with district maps redrawn and adopted by the Reapportionment Commission. These maps have resulted in a 5-0 Democratic delegation in the U.S. House of Representatives for the 2022 and 2024 election cycles, despite approximately 41% of the state's voters supporting Republican candidates in recent elections (e.g., 40.8% for the gubernatorial race in 2022, per Connecticut Secretary of State records).

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9. Historical redistricting records, including the 2001 map drawn by a bipartisan commission to protect incumbents (documented in Connecticut State Library archives), and the 2011 redistricting following the prior census, show a pattern of gerrymandering that has evolved to exclude competitive districts.

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10. Voter data from the Connecticut Secretary of State indicates that in the 2022 midterm elections, candidates opposing the dominant delegation averaged 39-42% of the vote across districts, yet no seat was won, suggesting potential vote dilution.

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11. The current maps interact with social and historical conditions to cause an inequality in the opportunity to elect preferred representatives.

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12. Adverse laws passed by the current Congress, such as regulatory expansions, may disproportionately affect underrepresented voters due to the lack of balanced representation.

- **LEGAL CLAIMS**

- **COUNT I: VIOLATION OF THE EQUAL PROTECTION CLAUSE (14TH AMENDMENT)**

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13. The gerrymandered maps violate the Equal Protection Clause by diluting the voting strength of approximately 41% of the electorate, denying equal protection. *Reynolds v. Sims* (377 U.S. 533, 1964) established the “one person, one vote” principle, which is breached here by the 5-0 outcome despite significant support.

- **COUNT II: VIOLATION OF THE FIRST AMENDMENT (FREEDOM OF ASSOCIATION)**

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By excluding representation for a substantial voter bloc, the maps infringe on the right to associate with chosen representatives and have that association reflected in Congress, as recognized in *Benisek v. Lamone* (585 U.S. 897, 2018).

- **COUNT III: VIOLATION OF ARTICLE I, SECTION 2**

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Article I, Section 2 mandates that representatives be chosen “by the People,” implying a process free from undue interference. The current maps subvert this principle, as held in *Wesberry v. Sanders* (376 U.S. 1, 1964), by failing to reflect the electorate’s diversity.

- COUNT IV: VIOLATION OF THE CONNECTICUT CONSTITUTION, ARTICLE VI, SECTION 4

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Article VI, Section 4 requires electoral districts to ensure fair representation. The Reapportionment Commission’s maps, criticized historically, dilute voter strength, breaching state constitutional standards.

- RELIEF SOUGHT

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17. Plaintiff requests:

- a. A declaratory judgment that the current congressional district maps are unconstitutional and violate state law.
- b. Injunctive relief to invalidate the maps and order a nonpartisan redraw.
- c. Compensatory damages to be determined for loss of voting rights and policy impacts.
- d. A precedent to guide fair redistricting nationwide.
- e. Costs and any further relief the Court deems just.

- EVIDENCE

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18. Voter Data: 2022 Connecticut election results show 39-42% support, per Secretary of State records (ct.gov/sots).

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19. Historical Records: 2001 and 2011 redistricting documents indicate potential manipulation, available via the Connecticut State Library (ctstatelibrary.org).

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20. Policy Impacts: Examples include regulatory expansions, documented in federal legislative records (congress.gov).

• PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Declare the current congressional maps unconstitutional and violative of state law.
- b. Issue an injunction to redraw the maps.
- c. Award compensatory damages to be determined.
- d. Establish a precedent for fair redistricting.
- e. Grant costs and further relief as appropriate.
- Respectfully submitted,

Pro Se Plaintiff

Date: August 11, 2025

