

New York Supreme Court
Appellate Division—Fourth Department

TIM HARKENRIDER, GUY C. BROUGHT, LAWRENCE CANNING,
PATRICIA CLARINO, GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ, LAWRENCE GARVEY, ALAN
NEPHEW, SUSAN ROWLEY, JOSEPHINE THOMAS,
and MARIANNE VOLANTE,

Docket No.:
CAE 22-00506

Petitioners-Respondents,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT GOVERNOR AND
PRESIDENT OF THE SENATE BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE SENATE ANDREA
STEWART-COUSINS, SPEAKER OF THE ASSEMBLY CARL HEASTIE,
and THE NEW YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND REAPPORTIONMENT,

Respondents-Appellants,

and

NEW YORK STATE BOARD OF ELECTIONS,

Respondent.

JOINT RECORD ON APPEAL
Volume 2 of 6 (Pages 461 – 1050)

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(For Continuation of Appearances See Inside Cover)

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2021-2022 N.Y. REG. SESS. LEG. BILLS
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INDEX NO. E2022-0116CV

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S08185 Summary:

BILL NO S08185A

SAME AS SAME AS UNI.

SPONSOR GIANARIS

COSPNSR

MLTSPNSR

Rpld & add Art 8 Titles I - III, §126, State L

Establishes the 150 assembly and 63 senate districts for the 2022 and subsequent elections.

S08185 Text:

STATE OF NEW YORK

S. 8185--A

A. 9040--A

SENATE - ASSEMBLY

January 31, 2022

IN SENATE -- Introduced by Sen. GIANARIS -- read twice and ordered printed, and when printed to be committed to the Committee on Rules -- committee discharged, bill amended, ordered reprinted as amended and recommitted to said committee

IN ASSEMBLY -- Introduced by M. of A. ZEBROWSKI -- read once and referred to the Committee on Governmental Operations -- committee discharged, bill amended, ordered reprinted as amended and recommitted to said committee

AN ACT to amend the state law, in relation to establishing assembly and senate districts; and to repeal article 8 of such law relating thereto

The People of the State of New York, represented in Senate and Assembly, do enact as follows:

1 Section 1. Article 8 of the state law is REPEALED and a new article 8
2 is added to read as follows:

3 ARTICLE 8

4 ASSEMBLY AND SENATE DISTRICTS OF THE STATE

5 TITLE I Assembly districts (§§ 120-122).

6 TITLE II Senate districts (§§ 123-125).

7 TITLE III Miscellaneous (§§ 126-128).

8 TITLE I

9 ASSEMBLY DISTRICTS

10 Section 120. Number of members of the assembly.

11 121. Assembly districts.

12 122. Separability of assembly districts.

13 § 120. Number of members of the assembly. The assembly shall consist
14 of one hundred fifty members chosen from the districts described within
15 and apportioned among the counties on the basis of the number of inhab-
16 itants of the state based on the Federal Census of two thousand twenty,
17 as adjusted pursuant to the provisions of part XX of chapter fifty-seven
18 of the laws of two thousand ten, as amended.

19 § 121. Assembly districts. Notwithstanding any other provision of law
20 to the contrary, the assembly districts shall consist as follows:

EXPLANATION--Matter in italics (underscored) is new; matter in brackets
[-] is old law to be omitted.

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1 1. Assembly District 1.
 2 Within Suffolk County
 3 All of East Hampton town
 4 All of Shelter Island town
 5 All of Shinnecock Reservation
 6 All of Southold town
 7 Within Brookhaven town:
 8 Tract: 159602
 9 Tract: 159603
 10 Tract: 159604
 11 Within Southampton town:
 12 Tract: 190403
 13 Tract: 190405
 14 Tract: 190502
 15 Tract: 190503
 16 Tract: 190504
 17 Tract: 190603
 18 Tract: 190604
 19 Tract: 190605
 20 Tract: 190606
 21 Tract: 190706
 22 Tract: 190708
 23 Tract: 190709
 24 Tract: 190710
 25 Tract: 190711
 26 Tract: 190712
 27 Tract: 190713
 28 Tract: 190714
 29 Tract: 190801
 30 Tract: 190802
 31 Within Brookhaven town:
 32 Tract: 159406 Blocks: 1011 1013-1015 1019-1021 2016-2017 3012-3013
 33 3016-3033 4009-4010 4020-4021
 34 Tract: 159415 Blocks: 1012 1014-1020
 35 Within Southampton town:
 36 Tract: 190402 Blocks: 1000-1027 2000-2032
 37 Tract: 190404 Blocks: 1000 1037-1038 3001
 38 Tract: 990100 Blocks: 0017-0024
 39 2. Assembly District 2.
 40 Within Suffolk County
 41 All of Riverhead town
 42 Within Brookhaven town:
 43 Tract: 158317
 44 Tract: 158318
 45 Tract: 158322
 46 Tract: 158328
 47 Tract: 158329
 48 Tract: 158401
 49 Tract: 158402
 50 Tract: 158407
 51 Tract: 158408
 52 Tract: 158410
 53 Tract: 158411
 54 Tract: 158412
 55 Tract: 159410
 56 Tract: 159413

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1 Tract: 158205 Blocks: 1000-1011 1013 2000-2014
 2 Tract: 158207 Blocks: 2002-2006 2020 2025 4013
 3 Tract: 158304 Blocks: 1000-1023 2000 2002-2019 3000-3020 4000-4030
 4 Tract: 158306 Blocks: 1000-1009 1011 1013-1027 2000-2014 3000-3019
 5 Tract: 158310 Blocks: 1000-1015 2000-2010 3000-3008 3010-3021
 6 3023-3026
 7 Tract: 158320 Blocks: 2000-2003 4000-4024
 8 Tract: 158326 Blocks: 1001-1008 1010-1011 1013-1018 1021-1026
 9 Tract: 158409 Blocks: 2000-2017 3000-3007
 10 Tract: 158710 Blocks: 2000-2021 3000-3001 3004 3008 3010-3012
 11 4000-4037 4043
 12 Tract: 159406 Blocks: 1000-1010 1012 1016-1018 2000-2015 2018-2027
 13 3000-3011 3014-3015 4000-4008 4011-4019 4022-4026
 14 Tract: 159407 Blocks: 1000 1003-1007 1046
 15 Tract: 159411 Blocks: 1000-1002
 16 Tract: 159414 Blocks: 1000-1013 1015-1018 1020 2000-2012
 17 Tract: 159415 Blocks: 1000-1011
 18 Within Southampton town:
 19 Tract: 190402 Blocks: 1028-1051
 20 Tract: 190404 Blocks: 1001-1036 1039-1041 2000-2012 3000 3002-3023
 21 Within Brookhaven town:
 22 Tract: 990100 Blocks: 0038-0042
 23 3. Assembly District 3.
 24 Within Suffolk County
 25 All of Poospatuck Reservation
 26 Within Brookhaven town:
 27 Tract: 158403
 28 Tract: 158709
 29 Tract: 158712
 30 Tract: 159103
 31 Tract: 159106
 32 Tract: 159107
 33 Tract: 159108
 34 Tract: 159112
 35 Tract: 159203
 36 Tract: 159204
 37 Tract: 159300
 38 Tract: 159408
 39 Tract: 159416
 40 Tract: 159509
 41 Tract: 159512
 42 Tract: 159513
 43 Tract: 159514
 44 Tract: 159515
 45 Tract: 159516
 46 Tract: 159517
 47 Tract: 159518
 48 Tract: 158310 Blocks: 3009 3022
 49 Tract: 158409 Blocks: 1000-1004
 50 Tract: 158607 Blocks: 3000-3026
 51 Tract: 158707 Blocks: 1000 1011 1014-1020 1022-1044
 52 Tract: 158708 Blocks: 1000-1007 2000-2011
 53 Tract: 158710 Blocks: 1000-1010 3002-3003 3005-3007 3009 3013-3015
 54 4038-4042 4044
 55 Tract: 158711 Blocks: 1000-1012 2000-2005 3012 4005-4006
 56 Tract: 158803 Blocks: 2000-2005

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1 Tract: 158806 Blocks: 1000-1033 3000-3003 3006-3009 3011 3013-3018
 2 3020 3033-3034
 3 Tract: 159109 Blocks: 2000 2003-2005 2008-2011
 4 Tract: 159110 Blocks: 1000-1026 2000-2011 3000-3010 3012-3015
 5 Tract: 159111 Blocks: 1000-1015 1019-1020 2000-2012
 6 Tract: 159201 Blocks: 1000-1003 1006-1014 1017
 7 Tract: 159407 Blocks: 1001-1002 1008-1045 1047-1050 2000-2024
 8 3000-3032
 9 Tract: 159411 Blocks: 1003-1028 2000-2033
 10 Tract: 159414 Blocks: 1014 1019
 11 Tract: 159415 Block: 1013
 12 Tract: 159510 Blocks: 2000-2022 2025-2026 2043-2044
 13 Tract: 159511 Blocks: 1000-1031 2000-2014 2016 2021-2026 3000-3025
 14 4000-4020
 15 Tract: 990100 Blocks: 0025-0027 0031
 16 4. Assembly District 4.
 17 Within Suffolk County
 18 Within Brookhaven Town:
 19 Tract: 158001
 20 Tract: 158009
 21 Tract: 158010
 22 Tract: 158011
 23 Tract: 158013
 24 Tract: 158014
 25 Tract: 158015
 26 Tract: 158016
 27 Tract: 158017
 28 Tract: 158102
 29 Tract: 158108
 30 Tract: 158114
 31 Tract: 158116
 32 Tract: 158117
 33 Tract: 158118
 34 Tract: 158206
 35 Tract: 158208
 36 Tract: 158209
 37 Tract: 158309
 38 Tract: 158315
 39 Tract: 158319
 40 Tract: 158324
 41 Tract: 158325
 42 Tract: 158327
 43 Tract: 158705
 44 Tract: 158713
 45 Tract: 159700
 46 Tract: 158012 Blocks: 1000-1002 1005 2000-2024 2027-2028 3000-3017
 47 Tract: 158107 Blocks: 4005-4009 4013-4015 4019-4024 4031-4034
 48 Tract: 158111 Blocks: 1000-1019 2003-2007 2015
 49 Tract: 158112 Blocks: 1000-1013 1017-1018 2000-2016
 50 Tract: 158120 Blocks: 1000-1011 2000-2022
 51 Tract: 158205 Blocks: 1012 1014 2015-2016
 52 Tract: 158207 Blocks: 1000-1028 2000-2001 2007-2019 2021-2024
 53 3000-3005 4000-4012
 54 Tract: 158304 Blocks: 2001 2005
 55 Tract: 158306 Blocks: 1010 1012 3020
 56 Tract: 158320 Blocks: 1000-1026 2004-2012 3000-3016

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1 Tract: 158326 Blocks: 1000 1009 1012 1019-1020
 2 Tract: 158707 Blocks: 1001-1010 1012-1013 1021
 3 Tract: 158708 Blocks: 3000-3004
 4 Tract: 158711 Blocks: 3000-3011 3013 4000-4004
 5 Tract: 158714 Blocks: 1011-1012
 6 Tract: 158715 Blocks: 1000-1005 1008-1012 2000-2012
 7 Tract: 990100 Blocks: 0043-0045 0049
 8 5. Assembly District 5.
 9 Within Suffolk County.
 10 Within Islip Town:
 11 Tract: 145808
 12 Tract: 146611
 13 Tract: 146612
 14 Tract: 146613
 15 Tract: 146614
 16 Tract: 146618
 17 Tract: 146619
 18 Tract: 146620
 19 Within Brookhaven Town:
 20 Tract: 158103
 21 Tract: 158119
 22 Tract: 158502
 23 Tract: 158505
 24 Tract: 158506
 25 Tract: 158509
 26 Tract: 158510
 27 Tract: 158511
 28 Tract: 158512
 29 Tract: 158513
 30 Tract: 158514
 31 Tract: 158604
 32 Tract: 158605
 33 Tract: 158606
 34 Tract: 158608
 35 Tract: 158609
 36 Within Islip Town:
 37 Tract: 145804 Blocks: 1013-1017 1020-1027 1034-1039 2000-2014
 38 Tract: 145807 Blocks: 1000-1002 1016-1017 1020-1021 1026-1027 1031
 39 2000-2026
 40 Tract: 145809 Blocks: 1000-1023 2000 2007-2010 2012-2022
 41 Tract: 146404 Blocks: 2000-2001
 42 Tract: 146608 Blocks: 2000-2008 3000-3003 3005-3010 3012-3013
 43 Tract: 147901 Blocks: 2000-2022
 44 Within Brookhaven Town:
 45 Tract: 158012 Blocks: 1003-1004 1006-1017 2025-2026
 46 Tract: 158107 Blocks: 1000-1015 2000-2011 3000-3016 4000-4004
 47 4010-4012 4016-4018 4025-4030 4035-4038
 48 Tract: 158111 Blocks: 2000-2002 2008-2014 2016-2017
 49 Tract: 158112 Blocks: 1014-1016 2017-2026
 50 Tract: 158120 Blocks: 2023-2024
 51 Tract: 158607 Blocks: 1000-1027 2000-2008
 52 Tract: 158714 Blocks: 1000-1010 1013-1014
 53 Tract: 158715 Blocks: 1006-1007
 54 Tract: 158803 Blocks: 1000-1024 3000-3007 4000-4019
 55 Tract: 158805 Blocks: 1000-1025 2000-2029 3000-3028 3030-3032
 56 Tract: 158806 Blocks: 3004-3005 3010 3012 3019 3021-3032

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1 6. Assembly District 6.
 2 Within Suffolk County
 3 Within Islip Town:
 4 Tract: 145601
 5 Tract: 145602
 6 Tract: 145604
 7 Tract: 145605
 8 Tract: 145702
 9 Tract: 145703
 10 Tract: 145705
 11 Tract: 145706
 12 Tract: 146001
 13 Tract: 146002
 14 Tract: 146004
 15 Tract: 146102
 16 Tract: 146103
 17 Tract: 146105
 18 Tract: 146106
 19 Tract: 146201
 20 Tract: 146202
 21 Tract: 146203
 22 Tract: 146204
 23 Tract: 146205
 24 Tract: 146206
 25 Tract: 146403
 26 Tract: 145603 Blocks: 1000-1019 2008-2016 3007-3014
 27 Tract: 145701 Blocks: 2003-2004 2016-2029 2031-2038
 28 Tract: 145804 Blocks: 1005-1012 1018-1019 1028-1033
 29 Tract: 145903 Blocks: 1000-1032 2000-2001 2004-2009 2021-2026 2035
 30 2038-2043 3000-3002 3008-3015 4000-4021
 31 Tract: 145904 Blocks: 1000-1012 1015-1016 2000-2003 2009-2010
 32 2018-2019
 33 Tract: 146005 Blocks: 1000-1046 2000-2026 3000-3026
 34 Tract: 146300 Blocks: 1000-1015 2000-2036 2038-2039
 35 Tract: 146402 Blocks: 1003 1006-1008 1010-1011
 36 Tract: 146404 Blocks: 1000-1025 2002-2006 2009-2011
 37 7. Assembly District 7.
 38 Within Suffolk County
 39 Within Islip town:
 40 Tract: 146500
 41 Tract: 146607
 42 Tract: 146616
 43 Tract: 146617
 44 Tract: 147100
 45 Tract: 147201
 46 Tract: 147202
 47 Tract: 147301
 48 Tract: 147302
 49 Tract: 147401
 50 Tract: 147402
 51 Tract: 147502
 52 Tract: 147503
 53 Tract: 147504
 54 Tract: 147505
 55 Tract: 147601
 56 Tract: 147602

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1 Tract: 147701
 2 Tract: 147702
 3 Tract: 147802
 4 Tract: 147803
 5 Tract: 147804
 6 Tract: 147902
 7 Within Brookhaven town:
 8 Tract: 158802
 9 Tract: 158901
 10 Tract: 158902
 11 Tract: 159000
 12 Within Islip town:
 13 Tract: 146005 Block: 1047
 14 Tract: 146300 Block: 2037
 15 Tract: 146402 Blocks: 1000-1002 1004-1005 1009 1012-1034 2000-2008
 16 3000-3012
 17 Tract: 146404 Blocks: 2007-2008
 18 Tract: 146608 Blocks: 1000-1006 3004 3011
 19 Tract: 147001 Blocks: 1008 1010-1012 3000 3002-3007 3010 3018-3025
 20 3030-3036
 21 Tract: 147003 Blocks: 1000-1002 1009-1018 1020-1041 2000-2029
 22 3000-3014
 23 Tract: 147004 Blocks: 1000-1004 1007-1096 1098-1099
 24 Tract: 147901 Blocks: 1000-1039 3000-3013
 25 Within Brookhaven town:
 26 Tract: 158805 Blocks: 3029 3033-3043
 27 Tract: 158806 Blocks: 1034-1038 2000-2019
 28 Tract: 159109 Blocks: 1000-1027 2001-2002 2006-2007 2012-2019
 29 Tract: 159110 Block: 3011
 30 Tract: 159111 Blocks: 1016-1018 1021
 31 Tract: 159201 Blocks: 1004-1005 1015-1016 1018 2000-2027
 32 Tract: 159510 Blocks: 1000-1084 2023-2024 2027-2042 2045-2055
 33 Tract: 990100 Block: 0028
 34 Within Islip town:
 35 Tract: 990100 Block: 0029
 36 8. Assembly District 8.
 37 Within Suffolk County
 38 All of Smithtown town
 39 Within Islip town:
 40 Tract: 145803
 41 Tract: 145810
 42 Tract: 145701 Blocks: 1000-1034 2000-2002 2005-2015 2030 3000-3014
 43 4000-4014
 44 Tract: 145804 Blocks: 1000-1004 3000-3020
 45 Tract: 145807 Blocks: 1003-1015 1018-1019 1022-1025 1028-1030
 46 Tract: 145809 Blocks: 2001-2006 2011
 47 9. Assembly District 9.
 48 Within Nassau County
 49 Within Oyster Bay town:
 50 Tract: 521500
 51 Tract: 521601
 52 Tract: 521602
 53 Tract: 521801
 54 Tract: 521802
 55 Tract: 521902
 56 Tract: 990302

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1 Within Suffolk County
 2 Within Babylon town:
 3 Tract: 122901
 4 Tract: 122902
 5 Tract: 123002
 6 Tract: 123101
 7 Tract: 123102
 8 Tract: 124301
 9 Tract: 124302
 10 Tract: 124401
 11 Tract: 124402
 12 Tract: 124500
 13 Tract: 124601
 14 Tract: 124602
 15 Within Islip town:
 16 Tract: 146704
 17 Tract: 146705
 18 Tract: 146800
 19 Tract: 146901
 20 Tract: 146902
 21 Within Nassau County
 22 Within Oyster Bay town:
 23 Tract: 520502 Blocks: 3014-3017
 24 Tract: 520600 Blocks: 2000-2003 2007-2015 3000-3011 4000-4011
 25 5000-5002 5004-5011 6016
 26 Tract: 520800 Block: 1006
 27 Tract: 521302 Blocks: 2000-2026
 28 Tract: 521400 Blocks: 2000-2020 3000-3026 4000-4018 5000-5020
 29 Tract: 521700 Blocks: 1000-1001 1004-1014 1020-1024 2000-2005
 30 2010-2019 3000-3004 3015-3028 4000-4022 5000-5013
 31 Tract: 522000 Blocks: 1000-1004 3001-3003 5027-5028
 32 Within Suffolk County
 33 Within Babylon town:
 34 Tract: 122603 Blocks: 1000-1017 2036-2037 2043 3008-3010 3013-3014
 35 Tract: 122802 Blocks: 1019-1021 1025-1026 2000-2021
 36 Tract: 123001 Blocks: 1000-1037 2000-2042 3001-3032
 37 Tract: 123404 Blocks: 3000 3032 3035-3036
 38 Within Islip town:
 39 Tract: 145901 Blocks: 1040-1041
 40 Tract: 146703 Blocks: 1009-1021 2004 2006 2009-2014 2019
 41 Tract: 146706 Blocks: 1000-1020 2000-2019 2023-2024 2032-2034
 42 Tract: 147001 Blocks: 1000-1007 1009 1013-1015 2000-2003 3001
 43 3008-3009 3011-3017 3026-3029 3037-3041
 44 Tract: 147003 Blocks: 1003-1008 1019
 45 Tract: 147004 Blocks: 1005-1006 1097
 46 Within Babylon town:
 47 Tract: 990100 Block: 0030
 48 10. Assembly District 10.
 49 Within Suffolk County
 50 Within Huntington town:
 51 Tract: 110103
 52 Tract: 110901
 53 Tract: 110902
 54 Tract: 111001
 55 Tract: 111002
 56 Tract: 111101

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1 Tract: 111102
2 Tract: 111103
3 Tract: 111201
4 Tract: 111202
5 Tract: 111401
6 Tract: 111402
7 Tract: 111504
8 Tract: 111506
9 Tract: 111507
10 Tract: 111508
11 Tract: 111900
12 Tract: 112001
13 Tract: 112002
14 Tract: 112104
15 Tract: 112204
16 Tract: 112212
17 Tract: 112213
18 Tract: 112215
19 Tract: 112216
20 Tract: 112218
21 Tract: 112219
22 Tract: 112220
23 Within Nassau County
24 Within Oyster Bay town:
25 Tract: 518203 Blocks: 1000-1005 1011 2000-2010 3000-3010
26 Tract: 518204 Blocks: 1000-1013 2000-2009 2020
27 Tract: 519702 Blocks: 1000-1026 1032-1036 2000
28 Tract: 519802 Block: 1007
29 Tract: 520100 Blocks: 1000 4000-4021 5000-5006 5008
30 Within Suffolk County
31 Within Huntington town:
32 Tract: 110104 Blocks: 1000-1016 2000-2013 3006-3010 3012
33 Tract: 111300 Blocks: 1003-1016 3003-3018
34 Tract: 111503 Blocks: 1000-1015 2000-2026 3002-3005
35 Tract: 112102 Blocks: 1000-1015 1019 2000-2026
36 Tract: 112211 Blocks: 1019 2008-2021 3001-3002 3020-3022 3028
37 Tract: 112217 Blocks: 1003-1012 1015-1032
38 11. Assembly District 11.
39 Within Suffolk County
40 Within Babylon town:
41 Tract: 122300
42 Tract: 122406
43 Tract: 122407
44 Tract: 122408
45 Tract: 122501
46 Tract: 122502
47 Tract: 123201
48 Tract: 123203
49 Tract: 123204
50 Tract: 123303
51 Tract: 123304
52 Tract: 123401
53 Tract: 123403
54 Tract: 123500
55 Tract: 123600
56 Tract: 123701

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1 Tract: 123703
 2 Tract: 123704
 3 Tract: 123801
 4 Tract: 123802
 5 Tract: 123900
 6 Tract: 124001
 7 Tract: 124002
 8 Tract: 124101
 9 Tract: 124102
 10 Tract: 124200
 11 Within Nassau County
 12 Within Oyster Bay town:
 13 Tract: 522000 Blocks: 1005-1025 2000-2020 3000 3004-3028 4000-4018
 14 5000-5026 5029-5031
 15 Within Suffolk County
 16 Within Babylon town:
 17 Tract: 122405 Blocks: 1000-1035 2004 2006-2010
 18 Tract: 122603 Blocks: 2004-2035 2038-2042 3002-3007 3012
 19 Tract: 122704 Blocks: 1032-1053
 20 Tract: 122801 Blocks: 1014-1019 4000-4008 4010-4016 4020-4022
 21 Tract: 122802 Blocks: 1002-1018 1022-1024 1027-1033
 22 Tract: 123001 Block: 3000
 23 Tract: 123404 Blocks: 1000-1014 2000-2030 3001-3031 3033-3034
 24 3037-3043
 25 12. Assembly District 12.
 26 Within Suffolk County
 27 Within Huntington town:
 28 Tract: 110101
 29 Tract: 110200
 30 Tract: 110300
 31 Tract: 110401
 32 Tract: 110402
 33 Tract: 110501
 34 Tract: 110502
 35 Tract: 110601
 36 Tract: 110602
 37 Tract: 110801
 38 Tract: 110803
 39 Tract: 111601
 40 Tract: 111602
 41 Tract: 111701
 42 Tract: 111703
 43 Tract: 111704
 44 Tract: 111801
 45 Tract: 111802
 46 Tract: 111803
 47 Tract: 111804
 48 Tract: 112103
 49 Tract: 122602
 50 Tract: 122604
 51 Tract: 122605
 52 Tract: 122705
 53 Tract: 122706
 54 Tract: 122707
 55 Within Islip town:
 56 Tract: 145905

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1 Tract: 201200
 2 Within Huntington town:
 3 Tract: 110104 Blocks: 3000-3005 3011
 4 Tract: 111300 Blocks: 1000-1002 2000-2021 3000-3002
 5 Tract: 111503 Blocks: 3000-3001 3006
 6 Tract: 112102 Blocks: 1016-1018
 7 Tract: 112211 Blocks: 1000-1018 2000-2007 2022 3000 3003-3019
 8 3023-3027
 9 Tract: 112217 Blocks: 1000-1002 1013-1014
 10 Within Babylon town:
 11 Tract: 122405 Blocks: 2000-2003 2005
 12 Tract: 122603 Blocks: 2000-2003 3000-3001 3011
 13 Tract: 122704 Blocks: 1000-1031 1054
 14 Tract: 122801 Blocks: 1000-1013 2000-2010 3000-3013 4009 4017-4019
 15 Tract: 122802 Blocks: 1000-1001
 16 Within Islip town:
 17 Tract: 145603 Blocks: 2000-2007 2017 3000-3006
 18 Tract: 145901 Blocks: 1000-1039 1042-1043 2000-2011
 19 Tract: 145903 Blocks: 2002-2003 2010-2020 2027-2034 2036-2037
 20 3003-3007 3016-3020
 21 Tract: 145904 Blocks: 1013-1014 2004-2008 2011-2017
 22 Tract: 146703 Blocks: 1000-1008 2000-2003 2005 2007-2008 2015-2018
 23 Tract: 146706 Blocks: 2020-2022 2025-2031
 24 Within Huntington town:
 25 Tract: 990100 Blocks: 0048 0053-0055
 26 13. Assembly District 13.
 27 Within Nassau County
 28 Within North Hempstead town:
 29 Tract: 302101
 30 Tract: 304001
 31 Tract: 304002
 32 Tract: 304100
 33 Tract: 304202
 34 Tract: 304203
 35 Tract: 304204
 36 Within Glen Cove city:
 37 Tract: 517000
 38 Tract: 517101
 39 Tract: 517102
 40 Tract: 517201
 41 Tract: 517202
 42 Within Oyster Bay town:
 43 Tract: 517400
 44 Tract: 517901
 45 Tract: 517902
 46 Tract: 518502
 47 Tract: 518900
 48 Tract: 519400
 49 Tract: 519500
 50 Tract: 519601
 51 Tract: 519602
 52 Tract: 990200
 53 Tract: 990301
 54 Within North Hempstead town:
 55 Tract: 302000 Blocks: 3000-3002 3004-3027 3029-3030 3038-3039
 56 3041-3043

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A. 9040--A

1 Tract: 302102 Blocks: 1000-1023 2000-2021 2024-2025 3000-3005
 2 4000-4007 4012-4014
 3 Tract: 302502 Blocks: 1000-1025 1028-1034 1036-1045 2000-2036
 4 Tract: 303900 Blocks: 1000-1024 2000-2001 2008-2012 3000-3015
 5 4000-4022
 6 Within Hempstead town:
 7 Tract: 407600 Block: 5000
 8 Tract: 517301 Blocks: 1002-1013 2000-2010 3000-3012
 9 Tract: 517302 Blocks: 1000-1009 2000-2012 3005-3008 3013 4003-4007
 10 Within Oyster Bay town:
 11 Tract: 517500 Blocks: 1033 2000-2006 2008-2013 2018-2019 2023-2025
 12 3003-3009 3015-3022 3024
 13 Tract: 517705 Blocks: 1019-1023 1027 1030-1037 1040
 14 Tract: 517801 Blocks: 1000-1007 1009 1011-1012 1017 1030 2016-2017
 15 3000-3001
 16 Tract: 518000 Blocks: 1000-1001 1004-1008
 17 Tract: 518201 Blocks: 1000-1005 1009 1011-1012 2000-2001
 18 Tract: 518204 Block: 2024
 19 Tract: 518501 Blocks: 1000-1033 2013-2023 2025-2048 3000-3024
 20 Tract: 518600 Blocks: 1018-1020 2008-2010 2016-2019 2024-2028
 21 Tract: 518800 Blocks: 1000-1014 2000-2009 2011-2027 3000-3012
 22 Tract: 519300 Blocks: 1000-1049 2000-2018 3002-3003 3009-3012
 23 3023-3024 3026-3027 5000-5024
 24 Tract: 519703 Blocks: 2001-2022 3001-3020
 25 Tract: 982100 Blocks: 1001 1003-1011
 26 14. Assembly District 14.
 27 Within Nassau County
 28 Within Hempstead town:
 29 Tract: 408400
 30 Tract: 408500
 31 Tract: 409600
 32 Tract: 409700
 33 Tract: 413400
 34 Tract: 414700
 35 Tract: 414800
 36 Tract: 414900
 37 Tract: 415101
 38 Tract: 415201
 39 Tract: 415202
 40 Tract: 415300
 41 Tract: 415401
 42 Tract: 415402
 43 Tract: 415500
 44 Tract: 415600
 45 Tract: 415700
 46 Tract: 415802
 47 Tract: 416000
 48 Tract: 522700
 49 Tract: 409100 Blocks: 1000-1009 2000-2009 3000-3009 4000-4008
 50 4011-4014 5013
 51 Tract: 409200 Blocks: 5017 6003-6007 6010-6012
 52 Tract: 409300 Blocks: 2000-2011 3000-3008 4000-4014
 53 Tract: 409400 Blocks: 3004-3020
 54 Tract: 409500 Blocks: 1000-1012
 55 Tract: 414400 Blocks: 3002 4000 4010-4011 5000

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A. 9040--A

1 Tract: 414600 Blocks: 1000-1001 1003-1011 2000-2010 3000-3009
2 4000-4008
3 Tract: 415000 Blocks: 1000-1021 2000-2019 3000-3007 4000-4013
4 5000-5016 5019
5 Tract: 415102 Blocks: 1000-1011 2000-2010 3000-3011 4000-4010
6 5000-5012 5020 5023-5026
7 Tract: 416100 Blocks: 1001-1017 2000-2021 3000-3017 4000-4015
8 Tract: 416900 Blocks: 1000-1051 1053-1064 1084-1117
9 Tract: 990400 Blocks: 0001-0005
10 15. Assembly District 15.
11 Within Nassau County
12 Within Oyster Bay town:
13 Tract: 517600
14 Tract: 517701
15 Tract: 517802
16 Tract: 518100
17 Tract: 518300
18 Tract: 518400
19 Tract: 518700
20 Tract: 519000
21 Tract: 519100
22 Tract: 519200
23 Tract: 519704
24 Tract: 519801
25 Tract: 519900
26 Tract: 520001
27 Tract: 520002
28 Tract: 520200
29 Tract: 520401
30 Tract: 520402
31 Tract: 981100
32 Within Hempstead town:
33 Tract: 407801 Blocks: 2000 3000-3019
34 Tract: 408800 Block: 5001
35 Within Glen Cove city:
36 Tract: 517301 Blocks: 1000-1001
37 Tract: 517302 Blocks: 3000-3004 3009-3012 4000-4002 4008-4011
38 Within Oyster Bay town:
39 Tract: 517500 Blocks: 1000-1032 2014-2017 2020-2022 3000-3002
40 3010-3014 3023
41 Tract: 517705 Blocks: 1000-1018 1024-1026 1028-1029 1038-1039
42 1041-1045
43 Tract: 517801 Blocks: 1008 1010 1013-1016 1018-1029 2000-2015
44 2018-2030 3002-3024
45 Tract: 518000 Blocks: 1002-1003 1009-1010 2000-2010 3000-3010
46 4000-4012 5000-5015 6000-6016
47 Tract: 518201 Blocks: 1006-1008 1010 1013-1040 2002-2022 3000-3019
48 Tract: 518203 Blocks: 1006-1010 1012
49 Tract: 518204 Blocks: 2010-2019 2021-2023 2025-2026 3000-3017
50 Tract: 518501 Blocks: 2000-2012 2024
51 Tract: 518600 Blocks: 1000-1017 1021 2000-2007 2011-2015 2020-2023
52 3000-3011 4000-4012
53 Tract: 518800 Block: 2010
54 Tract: 519300 Blocks: 3000-3001 3004-3008 3013-3022 3025 3028-3030
55 4000-4024
56 Tract: 519702 Blocks: 1027-1031 2001-2010 3000-3017 4000-4022

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A. 9040--A

1 Tract: 519703 Blocks: 1000-1021 2000-2023 3000-3021
 2 Tract: 519802 Blocks: 1000-1006 1008-1014 2000-2017 3000-3019
 3 4000-4017
 4 Tract: 520100 Blocks: 1001-1012 2000-2014 3000-3013 5007 5009-5032
 5 Tract: 982100 Blocks: 1000 1002
 6 16. Assembly District 16.
 7 Within Nassau County
 8 Within North Hempstead town:
 9 Tract: 300100
 10 Tract: 300300
 11 Tract: 300400
 12 Tract: 300500
 13 Tract: 300600
 14 Tract: 300700
 15 Tract: 300800
 16 Tract: 300901
 17 Tract: 300902
 18 Tract: 301000
 19 Tract: 301101
 20 Tract: 301102
 21 Tract: 301200
 22 Tract: 301300
 23 Tract: 301400
 24 Tract: 301500
 25 Tract: 301600
 26 Tract: 301700
 27 Tract: 301800
 28 Tract: 301900
 29 Tract: 302200
 30 Tract: 302300
 31 Tract: 303101
 32 Tract: 303203
 33 Tract: 990100
 34 Tract: 302000 Blocks: 1000-1023 2000-2026 3003 3028 3031-3037 3040
 35 Tract: 302102 Blocks: 2022-2023 2026-2033 3006-3021 4008-4011
 36 Tract: 302400 Blocks: 1000-1013 1020-1021 1025 2000-2014 3000-3014
 37 4000-4010
 38 Tract: 302501 Blocks: 1000-1006 1012-1016 1018-1019 2000-2009
 39 2017-2022 2026
 40 Tract: 302502 Blocks: 1026-1027 1035
 41 Tract: 302700 Blocks: 1000-1018 2000-2023 3000-3005
 42 Tract: 302800 Blocks: 1000-1001 1004-1009 1011 2004-2012 2014
 43 3002-3012 4000-4015 5000-5017 6000-6002 6008-6014 7002-7014
 44 Tract: 302900 Blocks: 1000 1002 1010-1011 2000-2001
 45 Tract: 303000 Blocks: 1002 1004 2004-2008 3000-3003 4000-4002
 46 4006-4008 5000-5006
 47 Tract: 303102 Blocks: 1000-1012 2000-2015 3000-3012 4017
 48 Tract: 303204 Blocks: 1000-1001
 49 Within Oyster Bay town:
 50 Tract: 517500 Block: 2007
 51 17. Assembly District 17.
 52 Within Nassau County
 53 Within Hempstead town:
 54 Tract: 407802
 55 Tract: 407900
 56 Tract: 408000

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A. 9040--A

1 Tract: 408100
 2 Tract: 408200
 3 Tract: 408300
 4 Tract: 408600
 5 Tract: 408700
 6 Tract: 408900
 7 Tract: 409000
 8 Within Oyster Bay town:
 9 Tract: 520300
 10 Tract: 520501
 11 Tract: 520700
 12 Tract: 520900
 13 Tract: 521000
 14 Tract: 521100
 15 Tract: 521200
 16 Tract: 521301
 17 Within Hempstead town:
 18 Tract: 407302 Blocks: 4000 4011 4021
 19 Tract: 407402 Block: 1013
 20 Tract: 407801 Blocks: 1000-1014 2001-2017 4000-4013
 21 Tract: 408800 Blocks: 1000-1013 2000-2015 3000-3010 4000-4009 5000
 22 5002-5017 6000-6029
 23 Tract: 409100 Blocks: 4009-4010 4015 5000-5012 5014-5022
 24 Tract: 409200 Blocks: 1000-1008 2000-2009 3000-3008 4000-4008
 25 5000-5016 5018-5019 6000-6002 6008-6009
 26 Tract: 409300 Blocks: 1000-1010
 27 Tract: 409400 Blocks: 1000-1014 2000-2017 3000-3003
 28 Tract: 409500 Blocks: 2000-2018 3000-3014
 29 Tract: 416100 Block: 1000
 30 Within Oyster Bay town:
 31 Tract: 520502 Blocks: 1000-1017 2000-2015 3000-3013 3018-3023
 32 4000-4021 5000-5010
 33 Tract: 520600 Blocks: 1000-1015 2004-2006 5003 6000-6015
 34 Tract: 520800 Blocks: 1000-1005 1007-1014 2000-2011 3000-3013
 35 4000-4010
 36 Tract: 521302 Blocks: 1000-1016 3000-3010 4000-4014
 37 Tract: 521400 Blocks: 1000-1018
 38 Tract: 521700 Blocks: 1002-1003 1015-1019 1025-1026 2006-2009
 39 2020-2021 3005-3014
 40 18. Assembly District 18.
 41 Within Nassau County
 42 Within Hempstead town:
 43 Tract: 406701
 44 Tract: 406801
 45 Tract: 406802
 46 Tract: 406900
 47 Tract: 407000
 48 Tract: 407201
 49 Tract: 407203
 50 Tract: 407204
 51 Tract: 407401
 52 Tract: 407501
 53 Tract: 407502
 54 Tract: 413900
 55 Tract: 414001
 56 Tract: 414002

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A. 9040--A

1 Tract: 414202
 2 Tract: 405900 Block: 4000
 3 Tract: 406002 Blocks: 1000 3011-3012
 4 Tract: 406201 Blocks: 1000-1004 2000-2009 3000-3006 3008-3010
 5 Tract: 406202 Blocks: 1000-1020 2000-2019 2022-2023 3000-3029
 6 4000-4012
 7 Tract: 406501 Blocks: 1004 1017-1020
 8 Tract: 406702 Blocks: 1000-1003 2000-2007 2016 3000-3001
 9 Tract: 407101 Blocks: 1000-1016 2000-2012 3000-3014 4000-4009
 10 4015-4016
 11 Tract: 407102 Blocks: 1000-1014 2000-2011 3000-3013 4000-4011 4013
 12 Tract: 407301 Blocks: 1004-1010
 13 Tract: 407302 Blocks: 1000-1018 2000-2015 3000-3014 4001-4010
 14 4012-4020
 15 Tract: 407402 Blocks: 1000-1012 1014-1018 2000-2006
 16 Tract: 412800 Blocks: 1004-1005
 17 Tract: 412900 Blocks: 2000 2002 2012-2018 3000-3027
 18 Tract: 413500 Blocks: 3000-3014 3024-3025
 19 Tract: 414100 Blocks: 1000-1016 2000-2007 3000-3019 4000-4009
 20 4011-4017 5000-5012 6000-6018 6022 6023
 21 Tract: 414201 Blocks: 1000-1006 2000-2018 3000-3002
 22 Tract: 414400 Blocks: 1000-1012 2000-2009 3000-3001 3003-3008
 23 4001-4009 4012-4016 4019-4021 4024 4026 5001-5006 5008 5012-5025
 24 Tract: 414502 Blocks: 1013 1018
 25 Tract: 414600 Block: 1002
 26 Tract: 415000 Blocks: 5017-5018
 27 Tract: 415102 Blocks: 5013-5019 5021-5022
 28 19. Assembly District 19.
 29 Within Nassau County
 30 Within North Hempstead town:
 31 Tract: 302600
 32 Tract: 303301
 33 Tract: 303302
 34 Tract: 303400
 35 Tract: 303500
 36 Tract: 303600
 37 Tract: 303700
 38 Tract: 303800
 39 Within Hempstead town:
 40 Tract: 405302
 41 Tract: 405800
 42 Tract: 406001
 43 Tract: 406100
 44 Tract: 406400
 45 Tract: 406600
 46 Tract: 407700
 47 Tract: 980100
 48 Within North Hempstead town:
 49 Tract 302400 Blocks: 1014-1019 1022-1024 5000-5020
 50 Tract: 302501 Blocks: 1007-1011 1017 2010-2016 2023-2025
 51 Tract: 302700 Blocks: 3006-3019
 52 Tract: 302800 Blocks: 1002-1003 1010 2000-2003 2013 3000-3001
 53 6003-6007 7000-7001 7015
 54 Tract: 302900 Blocks: 1001 1003-1009 1012-1019 2002-2019 3000-3015
 55 4000-4026

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A. 9040--A

1 Tract: 303000 Blocks: 1000-1001 1003 1005-1015 2000-2003 2009-2028
 2 3004-3013 4003-4005 4009-4016 5007-5016
 3 Tract: 303102 Blocks: 4000-4016 4018
 4 Tract: 303204 Blocks: 1002-1020 2000-2010 3000-3016 4000-4046
 5 Tract: 303900 Blocks: 2002-2007 2013-2020
 6 Within Hempstead town:
 7 Tract: 404500 Blocks: 1000-1002 1007-1008 2000 2002-2010
 8 Tract: 404700 Blocks: 1000-1030 2000-2017 4000-4019 5000 6000-6021
 9 Tract: 405500 Blocks: 1000-1013 2000-2012 3000-3004 4000-4004 5000-
 10 5015
 11 Tract: 405600 Blocks: 1000 2000-2008 3007-3013 3015
 12 Tract: 405700 Blocks: 1000-1011 2000-2010 3009
 13 Tract: 405900 Blocks: 1000-1013 2000-2014 3003-3008 3011-3012
 14 5000-5010
 15 Tract: 406002 Blocks: 1001-1010 2000-2013 3000-3010
 16 Tract: 406300 Blocks: 1000-1016 2000-2022 3000-3015 4000-4005
 17 4014-4018
 18 Tract: 406501 Blocks: 1000-1003 1005-1016 1021 2000-2020 3000-3035
 19 4000-4033 5000-5016 6000-6019
 20 Tract: 406702 Blocks: 2008-2015 2017-2020 3002-3005
 21 Tract: 407301 Blocks: 1000-1003 2000-2035 3000-3061
 22 Tract: 407600 Blocks: 1000-1011 2000-2011 3000-3011 4000-4011
 23 5001-5011 6000-6010
 24 20. Assembly District 20.
 25 Within Nassau County
 26 All of Long Beach city
 27 Within Hempstead town:
 28 Tract: 411000
 29 Tract: 411100
 30 Tract: 411200
 31 Tract: 411400
 32 Tract: 411500
 33 Tract: 411600
 34 Tract: 412200
 35 Tract: 413002
 36 Tract: 413200
 37 Tract: 416201
 38 Tract: 416202
 39 Tract: 416300
 40 Tract: 410900 Block: 4017
 41 Tract: 411301 Blocks: 1000-1026 2000-2014 3008-3012
 42 Tract: 411302 Blocks: 1001 1003-1004 1006-1022 2000-2022 3000-3021
 43 4000-4021 5000-5024
 44 Tract: 411700 Blocks: 1000-1018 2006 2010-2011 2013-2018 2020-2025
 45 2027 3000-3021 4014
 46 Tract: 412100 Blocks: 3013-3014
 47 Tract: 413001 Blocks: 1000-1014 2000-2011 3000-3004 3009-3021
 48 Tract: 413100 Blocks: 3003-3006 3014 4013-4014 5000-5015
 49 Tract: 413300 Blocks: 1002-1010 1013-1015 2002-2017 3000-3015
 50 4000-4014 5000-5011 6000-6011 7000-7017
 51 Tract: 416900 Blocks: 1065-1083 2000-2032 3000-3026
 52 Tract: 990400 Blocks: 0006-0007
 53 21. Assembly District 21.
 54 Within Nassau County
 55 Within Hempstead town:
 56 Tract: 410100

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A. 9040--A

1 Tract: 410200
 2 Tract: 411800
 3 Tract: 411901
 4 Tract: 411902
 5 Tract: 412000
 6 Tract: 412301
 7 Tract: 412302
 8 Tract: 412400
 9 Tract: 412500
 10 Tract: 412600
 11 Tract: 412700
 12 Tract: 413600
 13 Tract: 413700
 14 Tract: 413803
 15 Tract: 413804
 16 Tract: 414301
 17 Tract: 414303
 18 Tract: 414304
 19 Tract: 414501
 20 Tract: 405900 Blocks: 3000-3002 3009-3010 3013 4001-4012
 21 Tract: 406201 Block: 3007
 22 Tract: 406202 Blocks: 2020-2021
 23 Tract: 407101 Blocks: 4010-4014 4017-4030
 24 Tract: 407102 Blocks: 4012 4014-4019
 25 Tract: 410500 Blocks: 1000-1016 2000-2015
 26 Tract: 410600 Blocks: 2003 2005-2010 3000-3013 4000-4002 4007-4012
 27 4017-4019 5000-5003 5008-5017 6000-6004 6009-6014 6018-6023 7018
 28 Tract: 410700 Blocks: 1000-1010 2001-2007 2009 5000-5015 6000-6002
 29 6006-6015
 30 Tract: 411700 Blocks: 2000-2005 2007-2009 2012 2019 2026 4000-4013
 31 5000-5015
 32 Tract: 412100 Blocks: 1000-1018 2000-2012 3000-3012 4000-4029
 33 5000-5023
 34 Tract: 412800 Blocks: 1000-1003 1006-1040 2000-2020 3000-3012
 35 Tract: 412900 Blocks: 1000-1013 2001 2003-2011 2019-2020 4000-4020
 36 Tract: 413001 Blocks: 3005-3008 3022
 37 Tract: 413100 Blocks: 1000-1017 2000-2014 3000-3002 3007-3013
 38 4000-4012
 39 Tract: 413300 Blocks: 1000-1001 1011-1012 2000-2001
 40 Tract: 413500 Blocks: 1000-1011 2000-2010 3015-3023 4000-4009
 41 5000-5014 6000-6009
 42 Tract: 414100 Blocks: 4010 6019-6021
 43 Tract: 414201 Blocks: 1007-1015 3003-3008
 44 Tract: 414400 Blocks: 4017-4018 4022-4023 4025 5007 5009-5011
 45 Tract: 414502 Blocks: 1000-1012 1014-1017 1019-1020 2000-2013
 46 3000-3010
 47 Tract: 416900 Block: 1052
 48 22. Assembly District 22.
 49 Within Nassau County
 50 Within Hempstead town:
 51 Tract: 404300
 52 Tract: 404400
 53 Tract: 404600
 54 Tract: 404800
 55 Tract: 404901
 56 Tract: 404902

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A. 9040--A

1 Tract: 405000
 2 Tract: 405100
 3 Tract: 405200
 4 Tract: 405301
 5 Tract: 405400
 6 Tract: 409800
 7 Tract: 409900
 8 Tract: 410000
 9 Tract: 410300
 10 Tract: 410400
 11 Tract: 410800
 12 Tract: 404500 Blocks: 1003-1006 2001 3001-3014 4000-4012 5000-5012
 13 Tract: 404700 Blocks: 3000-3018 5001-5009
 14 Tract: 405500 Blocks: 3005-3008 4005-4016
 15 Tract: 405600 Blocks: 1001-1014 3000-3006 3014 3016 4000-4015
 16 Tract: 405700 Blocks: 3000-3008 4000-4010 5000-5008
 17 Tract: 406300 Blocks: 3016-3019 4006-4013
 18 Tract: 410500 Blocks: 3000-3028 4000-4018 5000-5022 6000-6015
 19 Tract: 410600 Blocks: 1000-1018 2000-2002 2004 4003-4006 4013-4016
 20 5004-5007 6005-6008 6015-6017 7000-7017 7019
 21 Tract: 410700 Blocks: 2000 2008 2010-2011 3000-3016 4000-4009
 22 6003-6005 6016-6025
 23 Tract: 410900 Blocks: 1000-1007 2000-2016 3000-3010 4000-4016
 24 4018-4019
 25 Tract: 411301 Blocks: 3000-3007 3013-3016
 26 Tract: 411302 Blocks: 1000 1002 1005
 27 23. Assembly District 23.
 28 Within Queens County
 29 Within Queens borough:
 30 Tract: 004001
 31 Tract: 004002
 32 Tract: 004401
 33 Tract: 005000
 34 Tract: 005200
 35 Tract: 005400
 36 Tract: 005800
 37 Tract: 006201
 38 Tract: 006202
 39 Tract: 008600
 40 Tract: 008800
 41 Tract: 086400
 42 Tract: 088400
 43 Tract: 089201
 44 Tract: 089202
 45 Tract: 091602
 46 Tract: 091603
 47 Tract: 091604
 48 Tract: 091800
 49 Tract: 092200
 50 Tract: 092800
 51 Tract: 093401
 52 Tract: 093402
 53 Tract: 093800
 54 Tract: 094201
 55 Tract: 099802
 56 Tract: 101002

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A. 9040--A

1 Tract: 101003
 2 Tract: 101004
 3 Tract: 107201
 4 Tract: 990100
 5 Tract: 071600 Block: 1010
 6 Tract: 094202 Blocks: 0002 0004 1001-1009 1012-1014 1016-1021 3003
 7 Tract: 094203 Blocks: 0001 1000-1013 2001 3000 4000 5000
 8 Tract: 095400 Blocks: 0003 2008 3008-3027
 9 Tract: 096400 Blocks: 0001 2008-2015 2020-2023
 10 Tract: 097202 Blocks: 0001 1000-1007
 11 Tract: 097204 Blocks: 1006-1008 1010 1011 1013 1014
 12 Tract: 099200 Blocks: 0001 1002-1004 1007 1008 2005-2014 2021-2023
 13 Tract: 099801 Blocks: 3001 3002 4000-4002 5006 5009 5010
 14 Tract: 100801 Blocks: 1000-1007 2001-2009
 15 Tract: 100804 Blocks: 1000-1005 1010-1012 2000-2011
 16 Tract: 103202 Blocks: 1001-1006 1010 1011 2000-2017 3000-3005
 17 4000-4005
 18 Tract: 107202 Blocks: 0003 0004 0006 0007 0010-0017 1002-1004 1006
 19 1008-1011
 20 24. Assembly District 24.
 21 Within Queens County
 22 Within Queens borough:
 23 Tract: 012000
 24 Tract: 012200
 25 Tract: 012400
 26 Tract: 012800
 27 Tract: 013200
 28 Tract: 014201
 29 Tract: 014400
 30 Tract: 014800
 31 Tract: 015802
 32 Tract: 021400
 33 Tract: 023000
 34 Tract: 045600
 35 Tract: 046400
 36 Tract: 047600
 37 Tract: 047801
 38 Tract: 049201
 39 Tract: 127700
 40 Tract: 129102
 41 Tract: 129103
 42 Tract: 129104
 43 Tract: 002600 Blocks: 1000 1005 1006
 44 Tract: 009400 Blocks: 1000 1001 2003 2004
 45 Tract: 009600 Blocks: 1000-1003 2000-2005
 46 Tract: 009800 Blocks: 1000-1005 2000 2001
 47 Tract: 010000 Blocks: 2000-2005
 48 Tract: 010400 Blocks: 1000-1003 2000-2003
 49 Tract: 010600 Blocks: 1000-1004 2000-2003
 50 Tract: 010800 Blocks: 2000-2004
 51 Tract: 011800 Blocks: 1000-1003
 52 Tract: 013000 Blocks: 1001-1007 2000-2005
 53 Tract: 013400 Blocks: 4000-4002
 54 Tract: 013800 Blocks: 2005-2007
 55 Tract: 014000 Blocks: 1000-1010
 56 Tract: 014202 Blocks: 1000-1009 2000-2005 2007-2012

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A. 9040--A

1 Tract: 015000 Blocks: 1003-1005 2000-2005
2 Tract: 015200 Block: 1002
3 Tract: 015400 Blocks: 1003-1005 2000-2005
4 Tract: 015600 Blocks: 1001-1005 2000-2005
5 Tract: 015801 Blocks: 3001-3004
6 Tract: 016400 Blocks: 1001-1005 2000-2005
7 Tract: 016600 Blocks: 1000-1004
8 Tract: 021200 Blocks: 2000-2007 2010 2011
9 Tract: 021602 Blocks: 1001-1012
10 Tract: 021603 Block: 1001
11 Tract: 022001 Blocks: 3011 3012
12 Tract: 022002 Blocks: 1000-1003 1006 1007 2000-2004 4003-4005
13 Tract: 023200 Blocks: 1000 1001 2000-2002 3000-3006
14 Tract: 023600 Blocks: 1000-1002
15 Tract: 044800 Blocks: 1000-1004 2000-2003
16 Tract: 045000 Blocks: 1001-1009 2000-2005
17 Tract: 045200 Blocks: 1001-1008
18 Tract: 045400 Blocks: 2000-2007
19 Tract: 045800 Blocks: 1000-1008
20 Tract: 046600 Blocks: 1000-1003
21 Tract: 047200 Blocks: 1000-1008 2000-2014 3000
22 Tract: 055200 Blocks: 1000-1021
23 Tract: 077905 Block: 1011
24 Tract: 128300 Blocks: 1011-1019
25 Tract: 130100 Blocks: 1004-1011 2000-2003 3003-3010 4000-4005
26 Tract: 136700 Blocks: 1000 1001 2000-2002 4000-4002
27 Tract: 137700 Blocks: 4003-4008
28 Tract: 138502 Block: 1027
29 25. Assembly District 25.
30 Within Queens County
31 Within Queens borough:
32 Tract: 079702
33 Tract: 079900
34 Tract: 080301
35 Tract: 083700
36 Tract: 084500
37 Tract: 120300
38 Tract: 120500
39 Tract: 120702
40 Tract: 121100
41 Tract: 121500
42 Tract: 122300
43 Tract: 124700
44 Tract: 126500
45 Tract: 126700
46 Tract: 133300
47 Tract: 133900
48 Tract: 134100
49 Tract: 134701
50 Tract: 134702
51 Tract: 140300
52 Tract: 140901
53 Tract: 140902
54 Tract: 141700
55 Tract: 143500
56 Tract: 144700

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A. 9040--A

1 Tract: 145102
 2 Tract: 022001 Blocks: 1000-1008 3000-3003 3007-3010 4000
 3 Tract: 022002 Blocks: 1004 1005 3000 3001 4000-4002
 4 Tract: 038302 Blocks: 1035 1040-1045 1090 1091
 5 Tract: 045000 Block: 1000
 6 Tract: 045200 Block: 1000
 7 Tract: 077905 Blocks: 1000-1010 1012 2000
 8 Tract: 079701 Blocks: 3000 4000-4002
 9 Tract: 080302 Blocks: 1000 1001 3000 3001
 10 Tract: 084901 Block: 2006
 11 Tract: 085900 Blocks: 2003 3000 3001
 12 Tract: 086100 Blocks: 2006 2007
 13 Tract: 119900 Blocks: 1008-1012
 14 Tract: 120100 Blocks: 1000-1002 1005-1011
 15 Tract: 120701 Blocks: 1004-1013 2000-2013
 16 Tract: 122702 Block: 5000
 17 Tract: 122703 Blocks: 1000 5000-5005
 18 Tract: 122704 Blocks: 3000-3003
 19 Tract: 124100 Blocks: 1000-1016 1018 1022 2000-2008 3000 3003-3008
 20 Tract: 128300 Blocks: 1000-1010
 21 Tract: 136700 Blocks: 1002-1005 3000-3018 5000-5003 6000-6004
 22 Tract: 137700 Blocks: 1000-1005 2002-2005
 23 Tract: 138501 Blocks: 3000 3004 3005
 24 Tract: 139900 Blocks: 1000-1010 2003-2013
 25 Tract: 142900 Blocks: 1004 1005 2000-2011 3000-3011 4000-4009
 26 Tract: 144100 Blocks: 1000-1006 2000-2004 3001 4000-4005
 27 Tract: 145101 Blocks: 1007 1009-1013
 28 Tract: 145900 Blocks: 2006-2008 3000-3007
 29 Tract: 147100 Blocks: 2004-2010
 30 26. Assembly District 26.
 31 Within Queens County
 32 Within Queens borough:
 33 Tract: 099701
 34 Tract: 099703
 35 Tract: 099704
 36 Tract: 099705
 37 Tract: 099900
 38 Tract: 108500
 39 Tract: 109300
 40 Tract: 109700
 41 Tract: 109900
 42 Tract: 111300
 43 Tract: 112300
 44 Tract: 112900
 45 Tract: 113300
 46 Tract: 113900
 47 Tract: 117500
 48 Tract: 118100
 49 Tract: 146300
 50 Tract: 146700
 51 Tract: 147900
 52 Tract: 148300
 53 Tract: 150701
 54 Tract: 150702
 55 Tract: 152901
 56 Tract: 152902

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S. 8185--A

23

A. 9040--A

1 Tract: 155101
 2 Tract: 155103
 3 Tract: 155104
 4 Tract: 099100 Blocks: 0001 1000-1002 2000-2002 3000-3002 3008 3009
 5 3011-3014 5000 5003
 6 Tract: 101700 Blocks: 1000-1010 2000-2009 4000-4002 6002 6003
 7 6006-6008
 8 Tract: 105900 Block: 4003
 9 Tract: 114100 Blocks: 1000-1018 2000-2011
 10 Tract: 114700 Blocks: 1000 1001 2000 2001 2010 2011
 11 Tract: 117100 Blocks: 3000 3010
 12 Tract: 118500 Blocks: 1000-1006
 13 Tract: 119300 Blocks: 1000-1006 2000
 14 Tract: 119500 Blocks: 1000-1008
 15 Tract: 130100 Blocks: 1000-1003 3000-3002
 16 Tract: 137700 Blocks: 2000 2001 3000-3011 4000-4002
 17 Tract: 138501 Blocks: 1000-1014 2000-2005 3001-3003 4000-4014
 18 Tract: 138502 Blocks: 1000-1026
 19 Tract: 139900 Blocks: 2000-2002
 20 Tract: 142900 Blocks: 1000-1003
 21 Tract: 144100 Blocks: 3000 3002-3006 4006-4008
 22 Tract: 145101 Blocks: 1000-1006 1008
 23 Tract: 145900 Blocks: 1000-1005 2000-2005
 24 Tract: 147100 Blocks: 1000-1017 2000-2003
 25 Tract: 156700 Blocks: 1000-1013
 26 Tract: 157101 Blocks: 1000-1004 2000-2007 3000 3001 4000-4015
 27 5000-5008
 28 Tract: 157102 Blocks: 2000-2009
 29 Tract: 157901 Blocks: 1000-1010 2000-2009 3000-3008 6000-6017
 30 Tract: 157902 Blocks: 1000-1011 2000-2008 3000-3008
 31 Tract: 162100 Blocks: 1003-1005
 32 27. Assembly District 27.
 33 Within Queens County
 34 Within Queens borough:
 35 Tract: 077902
 36 Tract: 077903
 37 Tract: 077904
 38 Tract: 077906
 39 Tract: 077907
 40 Tract: 077908
 41 Tract: 079300
 42 Tract: 080900
 43 Tract: 090700
 44 Tract: 091900
 45 Tract: 092500
 46 Tract: 092900
 47 Tract: 093900
 48 Tract: 094500
 49 Tract: 094700
 50 Tract: 097300
 51 Tract: 098100
 52 Tract: 098700
 53 Tract: 102900
 54 Tract: 125700
 55 Tract: 021601 Blocks: 1000-1006 1008 3000
 56 Tract: 022001 Blocks: 2000-2009 4001 4002

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24

A. 9040--A

1 Tract: 038301 Blocks: 0001 0002 1002-1009 1013-1025 1028
 2 Tract: 038302 Blocks: 1013-1024 1030-1034 1036-1039 1046-1063
 3 1069-1088
 4 Tract: 074700 Blocks: 1006 2000-2005
 5 Tract: 075701 Blocks: 1000-1002 2000 2001 3000-3004
 6 Tract: 075702 Blocks: 2000-2016 3000 3001
 7 Tract: 077300 Block: 1000
 8 Tract: 080302 Blocks: 1002-1015 2000-2009 3002-3016
 9 Tract: 088903 Blocks: 1000-1002
 10 Tract: 099100 Blocks: 1003 1004 3003-3007 3010 3015-3019 4000-4025
 11 5001 5002 5004-5016
 12 Tract: 101700 Blocks: 3000-3004 3006-3009 3011 5000 5001 6000 6001
 13 6004 6005 6009 7000-7004
 14 Tract: 103300 Blocks: 1000-1009
 15 Tract: 103900 Blocks: 1000-1009 2000-2009 3000-3014 4000-4015
 16 Tract: 122702 Blocks: 1000-1004 2000 2001 3000 3001 4000-4002
 17 5001-5008
 18 Tract: 122703 Blocks: 1001-1007 2000 3000 4000
 19 Tract: 122704 Blocks: 1000-1002 2000 3004 3005
 20 Tract: 124100 Blocks: 1017 1019-1021 3001 3002
 21 28. Assembly District 28.
 22 Within Queens County
 23 Within Queens borough:
 24 Tract: 013600
 25 Tract: 060701
 26 Tract: 061302
 27 Tract: 061900
 28 Tract: 062100
 29 Tract: 063500
 30 Tract: 063700
 31 Tract: 064500
 32 Tract: 065501
 33 Tract: 065702
 34 Tract: 065703
 35 Tract: 065900
 36 Tract: 066100
 37 Tract: 067700
 38 Tract: 069300
 39 Tract: 069701
 40 Tract: 069702
 41 Tract: 070300
 42 Tract: 070700
 43 Tract: 070900
 44 Tract: 071100
 45 Tract: 071303
 46 Tract: 071305
 47 Tract: 071306
 48 Tract: 072300
 49 Tract: 072900
 50 Tract: 073100
 51 Tract: 073700
 52 Tract: 073900
 53 Tract: 074100
 54 Tract: 074900
 55 Tract: 076901
 56 Tract: 076902

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S. 8185--A

25

A. 9040--A

1 Tract: 077500
 2 Tract: 013000 Block: 1000
 3 Tract: 013400 Blocks: 1000 1001 2000-2006 3000-3003
 4 Tract: 013800 Blocks: 1000-1003 2000-2004
 5 Tract: 014000 Blocks: 2000-2007
 6 Tract: 021601 Blocks: 1007 1009 1010 2000 2001
 7 Tract: 021602 Block: 1000
 8 Tract: 021603 Blocks: 1000 1002 2000
 9 Tract: 022001 Blocks: 3004-3006
 10 Tract: 049500 Blocks: 1011 1012 1014
 11 Tract: 051700 Blocks: 1014-1018
 12 Tract: 052100 Blocks: 1000 1002
 13 Tract: 057900 Blocks: 1000 2000
 14 Tract: 058100 Blocks: 1000-1005
 15 Tract: 059900 Blocks: 1000 1001
 16 Tract: 061301 Blocks: 1000-1005 2000-2004 3000 3001 3005 4000-4003
 17 Tract: 062300 Block: 1000
 18 Tract: 062500 Blocks: 1000 1002
 19 Tract: 062700 Block: 1003
 20 Tract: 063302 Blocks: 1000 2000 2002 2003
 21 Tract: 063900 Blocks: 1000-1011 2000-2003
 22 Tract: 064102 Blocks: 1000-1005 1017 1018
 23 Tract: 066301 Blocks: 2000-2009
 24 Tract: 066302 Blocks: 1000 1001
 25 Tract: 066501 Blocks: 1002-1006 2001 2002
 26 Tract: 066701 Blocks: 1000 1002-1005 1008 1011-1014
 27 Tract: 067900 Blocks: 3000-3011
 28 Tract: 069500 Blocks: 1000-1008
 29 Tract: 071304 Blocks: 1001 2000-2002 3000-3002 4000-4002
 30 Tract: 071701 Blocks: 2004 3002
 31 Tract: 072100 Blocks: 4000 4001 5000-5002
 32 Tract: 074300 Blocks: 2000-2002 3000-3002
 33 Tract: 075701 Blocks: 1003 2002 2003
 34 Tract: 075702 Blocks: 1000 1001
 35 Tract: 077300 Blocks: 1001-1006 2000-2004 3000-3006
 36 29. Assembly District 29.
 37 Within Queens County
 38 Within Queens borough:
 39 Tract: 032800
 40 Tract: 035800
 41 Tract: 036600
 42 Tract: 036800
 43 Tract: 039400
 44 Tract: 040200
 45 Tract: 041400
 46 Tract: 042400
 47 Tract: 042600
 48 Tract: 043200
 49 Tract: 043400
 50 Tract: 044000
 51 Tract: 044400
 52 Tract: 046000
 53 Tract: 046200
 54 Tract: 046800
 55 Tract: 047000
 56 Tract: 048000

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26

A. 9040--A

1 Tract: 048200
 2 Tract: 061601
 3 Tract: 061602
 4 Tract: 061800
 5 Tract: 062000
 6 Tract: 062400
 7 Tract: 062600
 8 Tract: 063000
 9 Tract: 063200
 10 Tract: 063800
 11 Tract: 064600
 12 Tract: 065000
 13 Tract: 065600
 14 Tract: 066000
 15 Tract: 066403
 16 Tract: 068200
 17 Tract: 024600 Blocks: 1000 1002
 18 Tract: 025402 Blocks: 1000-1002
 19 Tract: 025800 Blocks: 1000-1002 1009 1010
 20 Tract: 026400 Block: 1000
 21 Tract: 028200 Blocks: 1005-1011
 22 Tract: 028400 Blocks: 1004 1005 1008 1009
 23 Tract: 033000 Blocks: 1000-1013 2000-2002 2005 3000-3004
 24 Tract: 035200 Blocks: 1000-1015 2000 2003
 25 Tract: 037600 Blocks: 1003-1005 2002-2009 3000-3009 4000 4002-4016
 26 5000-5010
 27 Tract: 040000 Blocks: 1000-1007 2003-2005 2010
 28 Tract: 040400 Blocks: 2000 3004-3006 3008-3010 4003-4009
 29 Tract: 044601 Blocks: 2000 2001 2004 2005
 30 Tract: 044602 Blocks: 1000 1001 3000-3002
 31 Tract: 044800 Blocks: 1005 1006
 32 Tract: 045400 Blocks: 1000-1005
 33 Tract: 045800 Blocks: 1009 1010
 34 Tract: 046600 Blocks: 2000-2003
 35 Tract: 047200 Block: 3001
 36 Tract: 047802 Blocks: 1003-1008
 37 Tract: 048400 Blocks: 1003-1010 2000-2004 3003-3005 4003-4005
 38 Tract: 050000 Blocks: 1001-1011 2000-2006
 39 Tract: 053000 Block: 2004
 40 Tract: 061000 Block: 1013
 41 Tract: 061200 Block: 2008
 42 Tract: 065401 Blocks: 1000-1008 2002 3000-3004 3006 3007 3010
 43 Tract: 066402 Blocks: 1009 2000-2008 3000-3008
 44 Tract: 068000 Blocks: 1000 1007
 45 30. Assembly District 30.
 46 Within Queens County
 47 Within Queens borough:
 48 Tract: 024700
 49 Tract: 024900
 50 Tract: 025900
 51 Tract: 026100
 52 Tract: 026300
 53 Tract: 026501
 54 Tract: 026502
 55 Tract: 029100
 56 Tract: 029300

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S. 8185--A

27

A. 9040--A

1 Tract: 029500
 2 Tract: 047300
 3 Tract: 047900
 4 Tract: 048100
 5 Tract: 048301
 6 Tract: 048302
 7 Tract: 048500
 8 Tract: 048900
 9 Tract: 049301
 10 Tract: 049302
 11 Tract: 049700
 12 Tract: 049900
 13 Tract: 051300
 14 Tract: 014700 Blocks: 1000-1002
 15 Tract: 015100 Blocks: 1000 1001 2002 2003
 16 Tract: 016300 Blocks: 1000-1003
 17 Tract: 024300 Blocks: 1000-1014 2000-2003 2013-2015 3000-3011
 18 4000-4013
 19 Tract: 024500 Blocks: 1000-1005 2000 3000-3006
 20 Tract: 025100 Blocks: 2000-2005 3000 3001 3006
 21 Tract: 025500 Blocks: 1000-1009
 22 Tract: 025700 Blocks: 1000-1007 1010
 23 Tract: 026700 Blocks: 2002-2005 3003-3007
 24 Tract: 028900 Blocks: 1002 3003 3004
 25 Tract: 029700 Blocks: 1010-1012 2000-2016
 26 Tract: 030903 Block: 4003
 27 Tract: 030906 Blocks: 1002-1006 2000-2003 3000-3003
 28 Tract: 046901 Block: 2001
 29 Tract: 047100 Blocks: 1002-1004 2000-2004
 30 Tract: 047500 Blocks: 1001-1011 2000-2009
 31 Tract: 049500 Blocks: 1000-1010 1013
 32 Tract: 050700 Blocks: 1008-1010 1014 1015
 33 Tract: 051100 Blocks: 2000-2007
 34 Tract: 051500 Blocks: 1000-1004 2000-2004 3000-3002
 35 Tract: 051700 Block: 1000
 36 Tract: 066302 Block: 1002
 37 Tract: 066501 Blocks: 1000 1001 1007 2000 2003-2005 3000-3003
 38 4000-4005
 39 Tract: 066701 Blocks: 1001 1006 1007 1009 1010 1015 2000-2005
 40 Tract: 066900 Blocks: 1001-1005 2000-2004
 41 Tract: 068300 Blocks: 1003 1004 2004 2005
 42 Tract: 068700 Blocks: 3004-3007 3014 3015
 43 31. Assembly District 31.
 44 Within Queens County
 45 Within Queens borough:
 46 Tract: 010200
 47 Tract: 016800
 48 Tract: 017000
 49 Tract: 017200
 50 Tract: 017400
 51 Tract: 017600
 52 Tract: 017800
 53 Tract: 018000
 54 Tract: 030600
 55 Tract: 032000
 56 Tract: 065402

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S. 8185--A

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A. 9040--A

1 Tract: 066401
 2 Tract: 066404
 3 Tract: 069000
 4 Tract: 069400
 5 Tract: 081400
 6 Tract: 081800
 7 Tract: 083800
 8 Tract: 084000
 9 Tract: 084601
 10 Tract: 084602
 11 Tract: 097205
 12 Tract: 097206
 13 Tract: 097207
 14 Tract: 100803
 15 Tract: 103201
 16 Tract: 009400 Block: 1006
 17 Tract: 009600 Blocks: 1004 1005 2006-2008
 18 Tract: 010000 Blocks: 1000-1005
 19 Tract: 010400 Blocks: 2004 2005
 20 Tract: 010600 Block: 2004
 21 Tract: 015000 Blocks: 1000-1002
 22 Tract: 015200 Blocks: 1003 1006 2004-2006
 23 Tract: 015400 Blocks: 1000 1001 1002
 24 Tract: 015600 Block: 1000
 25 Tract: 015801 Blocks: 1000-1007 2000-2006 3000 3005
 26 Tract: 016400 Block: 1000
 27 Tract: 016600 Blocks: 1005 1006 2000-2005
 28 Tract: 033000 Blocks: 2003 2004 2006 3005-3013
 29 Tract: 065401 Blocks: 1009-1012 2000 2001 2003-2009 3005 3008 3009
 30 Tract: 066402 Blocks: 1000-1008 1010
 31 Tract: 068000 Blocks: 1001-1006 1008-1015 2000-2011 3000-3013
 32 4000-4016
 33 Tract: 071600 Blocks: 1000-1009 1011-1031
 34 Tract: 079000 Blocks: 2001-2007
 35 Tract: 079200 Blocks: 1009 1010 2001-2009
 36 Tract: 094202 Blocks: 0001 0003 1000 1010 1011 1015 2000-2005
 37 3000-3002 3004-3018
 38 Tract: 094203 Block: 2000
 39 Tract: 095400 Blocks: 0001 0002 1000-1016 2000-2007 3000-3007
 40 Tract: 096400 Blocks: 1000-1023 2000-2007 2016-2019
 41 Tract: 097202 Blocks: 1008 1009
 42 Tract: 097204 Blocks: 1000-1005 1009 1012 2000 3000-3002
 43 Tract: 099200 Blocks: 1000 1001 1005 1006 2000-2004 2015-2020
 44 2024-2026
 45 Tract: 099801 Blocks: 1000-1012 2000 2001 3000 3003 3004 5000-5005
 46 5007 5008
 47 Tract: 100801 Blocks: 0001 0002 2000
 48 Tract: 100804 Blocks: 0001 1006-1009
 49 Tract: 103202 Blocks: 1000 1007-1009 1012
 50 Tract: 107202 Blocks: 0001 0002 0005 0008 0009 0018 1000 1001 1005
 51 1007
 52 32. Assembly District 32.
 53 Within Queens County
 54 Within Queens borough:
 55 Tract: 018200
 56 Tract: 018401

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S. 8185--A

29

A. 9040--A

1 Tract: 018402
 2 Tract: 018600
 3 Tract: 018800
 4 Tract: 019000
 5 Tract: 019200
 6 Tract: 019400
 7 Tract: 019600
 8 Tract: 019800
 9 Tract: 020200
 10 Tract: 020400
 11 Tract: 020600
 12 Tract: 020800
 13 Tract: 023800
 14 Tract: 024000
 15 Tract: 025401
 16 Tract: 026000
 17 Tract: 026200
 18 Tract: 026600
 19 Tract: 027000
 20 Tract: 027200
 21 Tract: 027400
 22 Tract: 027600
 23 Tract: 027800
 24 Tract: 028000
 25 Tract: 028801
 26 Tract: 028802
 27 Tract: 028803
 28 Tract: 029400
 29 Tract: 033401
 30 Tract: 033403
 31 Tract: 033404
 32 Tract: 033405
 33 Tract: 078800
 34 Tract: 014202 Blocks: 2006
 35 Tract: 015200 Blocks: 1000 1001 1004 1005 2000-2003
 36 Tract: 021200 Blocks: 1000-1011 2008 2009
 37 Tract: 023200 Blocks: 3007 3008
 38 Tract: 023600 Blocks: 1003 1004 2000-2003
 39 Tract: 024600 Blocks: 1001 1003-1008
 40 Tract: 025402 Blocks: 1003-1010 2000-2006 3000-3004
 41 Tract: 025800 Blocks: 1003-1008 1011 1012 2000-2003
 42 Tract: 026400 Blocks: 1001-1008 2000-2007
 43 Tract: 028200 Blocks: 1000-1004
 44 Tract: 028400 Blocks: 1000-1003 1006 1007 1010-1014 2000-2009
 45 Tract: 033000 Blocks: 4000-4006 5000-5007
 46 Tract: 035200 Blocks: 2001 2002 2004-2012
 47 Tract: 044601 Blocks: 1000-1005 2002 2003
 48 Tract: 044602 Blocks: 1002 2000-2002 3003
 49 Tract: 079000 Blocks: 1000-1007 2000 2008-2010
 50 Tract: 079200 Blocks: 1000-1008 2000 2010
 51 33. Assembly District 33.
 52 Within Queens County
 53 Within Queens borough:
 54 Tract: 038400
 55 Tract: 039800
 56 Tract: 049202

S. 8185--A

30

A. 9040--A

- 1 Tract: 049600
- 2 Tract: 050201
- 3 Tract: 050202
- 4 Tract: 050400
- 5 Tract: 050600
- 6 Tract: 050800
- 7 Tract: 051000
- 8 Tract: 051200
- 9 Tract: 051600
- 10 Tract: 051800
- 11 Tract: 052000
- 12 Tract: 052200
- 13 Tract: 052400
- 14 Tract: 052600
- 15 Tract: 052800
- 16 Tract: 053200
- 17 Tract: 053401
- 18 Tract: 053601
- 19 Tract: 053800
- 20 Tract: 054000
- 21 Tract: 054200
- 22 Tract: 054800
- 23 Tract: 055400
- 24 Tract: 055600
- 25 Tract: 055800
- 26 Tract: 056000
- 27 Tract: 056200
- 28 Tract: 056400
- 29 Tract: 056600
- 30 Tract: 056800
- 31 Tract: 058000
- 32 Tract: 058200
- 33 Tract: 059000
- 34 Tract: 059200
- 35 Tract: 059400
- 36 Tract: 059600
- 37 Tract: 059800
- 38 Tract: 060000
- 39 Tract: 060600
- 40 Tract: 060800
- 41 Tract: 061400
- 42 Tract: 062200
- 43 Tract: 157903
- 44 Tract: 161700
- 45 Tract: 037600 Blocks: 1000-1002 1006 1007 2000 2001 4001
- 46 Tract: 040000 Blocks: 1008-1010 2000-2002 2006-2009
- 47 Tract: 040400 Blocks: 1000-1006 2001-2005 3000-3003 3007 4000-4002
- 48 Tract: 047802 Blocks: 1000-1002
- 49 Tract: 048400 Blocks: 1000-1002 3000-3002 4000-4002 4006-4008
- 50 Tract: 050000 Blocks: 1000 1012 1013
- 51 Tract: 053000 Blocks: 1000-1005 2000-2003 2005-2007
- 52 Tract: 055200 Blocks: 2000-2011
- 53 Tract: 061000 Blocks: 1000-1012 1014 1015
- 54 Tract: 061200 Blocks: 1000-1007 2000-2007
- 55 Tract: 156700 Block: 1014
- 56 Tract: 157101 Blocks: 4016 5009-5012 6000-6014 7000-7011 8000-8013

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S. 8185--A

31

A. 9040--A

1 Tract: 157102 Blocks: 1000-1009
 2 Tract: 157901 Blocks: 4000-4008 5000-5007
 3 Tract: 157902 Blocks: 4000-4009 5000-5008
 4 Tract: 162100 Blocks: 1000-1002 1006-1009 2000-2011 3000-3007
 5 4000-4009 5000-5015
 6 34. Assembly District 34.
 7 Within Queens County
 8 Within Queens Borough:
 9 Tract: 010701
 10 Tract: 011100
 11 Tract: 011300
 12 Tract: 011500
 13 Tract: 011700
 14 Tract: 011900
 15 Tract: 012100
 16 Tract: 012301
 17 Tract: 013500
 18 Tract: 013700
 19 Tract: 014100 Blocks: 1000 2000-2013
 20 Tract: 014500
 21 Tract: 027301
 22 Tract: 027302
 23 Tract: 027500
 24 Tract: 027701
 25 Tract: 027702
 26 Tract: 027900
 27 Tract: 029900
 28 Tract: 030905
 29 Tract: 032700
 30 Tract: 033700
 31 Tract: 033900
 32 Tract: 035100
 33 Tract: 009500 Blocks: 1000-1001
 34 Tract: 009700 Blocks: 4000-4002
 35 Tract: 010100 Blocks: 2001-2006
 36 Tract: 010300 Blocks: 4000-4001
 37 Tract: 010500 Blocks: 3002 4000-4001
 38 Tract: 012500 Blocks: 1002 1003 1007-1012 2000-2002
 39 Tract: 014300 Blocks: 1000-1001 2002
 40 Tract: 014700 Blocks: 2000-2002 3001-3002
 41 Tract: 014900 Blocks: 1000-1001 2002-2004
 42 Tract: 015100 Blocks: 2000-2001 2004-2005
 43 Tract: 015300 Blocks: 1000-1005 2001-2002
 44 Tract: 016100 Blocks: 1001-1002 2000-2002
 45 Tract: 016300 Blocks: 2000-2002 3000-3001
 46 Tract: 026901 Blocks: 4000-4001
 47 Tract: 027102 Block: 1000
 48 Tract: 028100 Blocks: 1000-1002 2000
 49 Tract: 028300 Blocks: 1000-1001
 50 Tract: 028500 Blocks: 1000-1001
 51 Tract: 028700 Blocks: 1000-1001 4000
 52 Tract: 028900 Blocks: 1000-1001
 53 Tract: 029700 Blocks: 1000-1009 1013-1015
 54 Tract: 030903 Blocks: 1000-1005 2000-2006 3000-3002 4000-4002
 55 Tract: 030904 Blocks: 1008-1013 1015-1019 2000-2006
 56 Tract: 030906 Blocks: 1000-1001

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S. 8185--A

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A. 9040--A

1 Tract: 031700 Blocks: 1000-1002 2001-2002 2004-2007 3002-3005
 2 4003-4010 5000-5016
 3 Tract: 032900 Blocks: 1009-1012 2005-2006 3007-3009
 4 Tract: 033100 Blocks: 0003-0004
 5 Tract: 035300 Blocks: 1003 2000-2002
 6 Tract: 037501 Blocks: 1000-1001
 7 Tract: 037502 Blocks: 1001-1005 2000-2001
 8 Tract: 037700 Block: 2004
 9 Tract: 040501 Blocks: 1000-1002
 10 Tract: 040502 Block: 1002
 11 Tract: 040701 Blocks: 1000-1002
 12 Tract: 040702 Blocks: 1002 2000 3001
 13 Tract: 040901 Blocks: 1000-1002
 14 Tract: 040902 Blocks: 1001 2000-2003
 15 Tract: 046500 Blocks: 1000-1005 2000-2003
 16 Tract: 046700 Blocks: 1000-1001
 17 Tract: 046902 Blocks: 1000-1002
 18 35. Assembly District 35.
 19 Within Queens County
 20 Within Queens Borough:
 21 Tract: 034700
 22 Tract: 035700
 23 Tract: 036100
 24 Tract: 036300
 25 Tract: 036500
 26 Tract: 036700
 27 Tract: 037100
 28 Tract: 037300
 29 Tract: 037900
 30 Tract: 038100
 31 Tract: 039901
 32 Tract: 039902
 33 Tract: 043701
 34 Tract: 043702
 35 Tract: 045500
 36 Tract: 071900
 37 Tract: 074500
 38 Tract: 030904 Blocks: 1000-1007 1014
 39 Tract: 031700 Blocks: 2000 2003 3000-3001 4000-4002 4011-4017
 40 Tract: 032900 Blocks: 1000-1008 2000-2004 3000-3006
 41 Tract: 033100 Blocks: 0001-0002 0005-0006 1000-1002
 42 Tract: 035300 Blocks: 1000-1002 1004-1008 2003-2005
 43 Tract: 037502 Block: 1000
 44 Tract: 037700 Blocks: 1000-1004 2000-2003
 45 Tract: 038302 Blocks: 0001 1000-1012 1025-1029 1064-1068 1089
 46 Tract: 040102 Blocks: 1000-1001 2000-2002
 47 Tract: 040302 Blocks: 1000-1003
 48 Tract: 040502 Blocks: 1000-1001
 49 Tract: 040702 Blocks: 1000-1001 3000
 50 Tract: 040902 Block: 1000
 51 Tract: 042700 Blocks: 2003-2006
 52 Tract: 043900 Blocks: 2002-2003 2006-2010
 53 Tract: 044301 Blocks: 2001 2003-2004
 54 Tract: 044302 Blocks: 2000-2005 3000-3005
 55 Tract: 045700 Blocks: 1000 1003-1004
 56 Tract: 045900 Blocks: 1006 2000

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33

A. 9040--A

1 Tract: 068300 Blocks: 1000 2000-2001 3000 3002
 2 Tract: 071304 Block: 1000
 3 Tract: 071701 Blocks: 1000 2000-2003 3000-3001 4000-4002
 4 Tract: 071702 Blocks: 1000 2000-2005 2013-2015
 5 Tract: 072100 Blocks: 1000-1001 2000-2001 3000-3001
 6 Tract: 074300 Blocks: 1000-1002 4000-4002
 7 Tract: 074700 Blocks: 1000-1005
 8 36. Assembly District 36.
 9 Within Queens County
 10 Within Queens Borough:
 11 Tract: 001902
 12 Tract: 001903
 13 Tract: 002500
 14 Tract: 003100
 15 Tract: 003301
 16 Tract: 003302
 17 Tract: 003700
 18 Tract: 003900
 19 Tract: 004300
 20 Tract: 004500
 21 Tract: 004700
 22 Tract: 005100
 23 Tract: 005300
 24 Tract: 005500
 25 Tract: 005700
 26 Tract: 005900
 27 Tract: 006100
 28 Tract: 006300
 29 Tract: 006501
 30 Tract: 006502
 31 Tract: 006900
 32 Tract: 007100
 33 Tract: 007300
 34 Tract: 007500
 35 Tract: 007700
 36 Tract: 007900
 37 Tract: 008100
 38 Tract: 008300
 39 Tract: 008500
 40 Tract: 008700
 41 Tract: 009100
 42 Tract: 009900
 43 Tract: 015500
 44 Tract: 015700
 45 Tract: 015900
 46 Tract: 000103 Block: 1000
 47 Tract: 000702 Blocks: 1000 2000
 48 Tract: 001901 Blocks: 1000-1001
 49 Tract: 009500 Blocks: 1002-1004 2000-2019
 50 Tract: 009700 Blocks: 1000-1003 2000-2005 3000-3002
 51 Tract: 010100 Blocks: 1000-1007 2000 2007
 52 Tract: 010300 Blocks: 1000-1004 2000-2004 3000-3001
 53 Tract: 010500 Blocks: 1000 1001 2000 2001 3000 3001
 54 Tract: 012500 Blocks: 1000-1001 1004-1006 1013-1021 2003-2004
 55 Tract: 014100 Block: 1001
 56 Tract: 014300 Blocks: 2000-2001

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34

A. 9040--A

1 Tract: 014700 Blocks: 3000
2 Tract: 014900 Blocks: 2000-2001
3 Tract: 015300 Blocks: 2000 2003
4 Tract: 016100 Blocks: 1000 1003
5 Tract: 017101 Blocks: 1005-1008 1010-1013 1015
6 Tract: 017102 Blocks: 1003-1004
7 37. Assembly District 37.
8 Within Queens County
9 Within Queens Borough:
10 Tract: 000101
11 Tract: 000102
12 Tract: 000104
13 Tract: 000701
14 Tract: 016900
15 Tract: 017901
16 Tract: 017902
17 Tract: 018101
18 Tract: 018102
19 Tract: 018300
20 Tract: 018501
21 Tract: 018502
22 Tract: 018700
23 Tract: 018900
24 Tract: 019901
25 Tract: 019902
26 Tract: 019903
27 Tract: 020500
28 Tract: 021900
29 Tract: 022900
30 Tract: 023501
31 Tract: 023502
32 Tract: 025301
33 Tract: 025302
34 Tract: 052500
35 Tract: 053100
36 Tract: 053501
37 Tract: 053502
38 Tract: 053901
39 Tract: 053902
40 Tract: 058300
41 Tract: 058500
42 Tract: 058700
43 Tract: 058900
44 Tract: 059100
45 Tract: 059300
46 Tract: 059501
47 Tract: 059502
48 Tract: 060100
49 Tract: 060300
50 Tract: 000103 Blocks: 1001-1003
51 Tract: 000702 Blocks: 1001-1006 2001-2004 3000-3009
52 Tract: 001901 Blocks: 1002-1006
53 Tract: 017101 Blocks: 1000-1004 1009 1014
54 Tract: 017102 Blocks: 1000-1002 1005-1006
55 Tract: 024300 Blocks: 2004-2012 2016
56 Tract: 024500 Blocks: 2001-2004 4000-4006

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A. 9040--A

1 Tract: 025100 Blocks: 1000-1004 3002-3005 4000-4003
2 Tract: 025500 Blocks: 1010-1015
3 Tract: 025700 Blocks: 1008-1009
4 Tract: 051100 Blocks: 1000-1012
5 Tract: 051500 Blocks: 3003-3005
6 Tract: 051700 Blocks: 1001-1013 2000-2005
7 Tract: 052100 Blocks: 1001 2000-2007
8 Tract: 054500 Blocks: 1000-1002 2000
9 Tract: 054700 Blocks: 1000-1001
10 Tract: 054900 Blocks: 1000-1002 2000-2002
11 Tract: 055100 Blocks: 1000-1003 3000-3002 4000-4002
12 Tract: 058100 Blocks: 2000-2006
13 Tract: 059900 Blocks: 1002-1003 2000-2005
14 Tract: 061301 Blocks: 3002-3004
15 38. Assembly District 38.
16 Within Queens County
17 Within Queens Borough:
18 Tract: 000200
19 Tract: 000400
20 Tract: 000600
21 Tract: 000800
22 Tract: 001000
23 Tract: 001200
24 Tract: 001400
25 Tract: 001600
26 Tract: 001800
27 Tract: 002000
28 Tract: 002200
29 Tract: 002400
30 Tract: 002800
31 Tract: 003000
32 Tract: 003200
33 Tract: 003400
34 Tract: 003600
35 Tract: 003800
36 Tract: 004200
37 Tract: 011000
38 Tract: 011200
39 Tract: 011400
40 Tract: 011600
41 Tract: 012601
42 Tract: 012602
43 Tract: 055300
44 Tract: 055500
45 Tract: 055700
46 Tract: 055900
47 Tract: 056100
48 Tract: 056500
49 Tract: 056700
50 Tract: 057700
51 Tract: 062900
52 Tract: 063301
53 Tract: 064101
54 Tract: 002600 Blocks: 1001-1004 2000-2002
55 Tract: 009400 Blocks: 1002-1005 2000-2002
56 Tract: 009800 Blocks: 2002-2005

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S. 8185--A

36

A. 9040--A

1 Tract: 010800 Blocks: 1000-1002
 2 Tract: 011800 Blocks: 1004 2000-2004
 3 Tract: 054500 Blocks: 2001-2003 3000-3002
 4 Tract: 054700 Blocks: 1002-1004 2000-2002 3000-3002
 5 Tract: 054900 Blocks: 3000-3002 4000-4005
 6 Tract: 055100 Blocks: 1004 2000-2004
 7 Tract: 057900 Blocks: 1001-1002 2001-2003
 8 Tract: 062300 Blocks: 1001-1006 2000-2005
 9 Tract: 062500 Blocks: 1001 1003-1007 2000-2005
 10 Tract: 062700 Blocks: 1000-1002 1004-1007 2000-2003
 11 Tract: 063302 Blocks: 1001-1003 2001 2004
 12 Tract: 063900 Blocks: 2004-2007
 13 Tract: 064102 Blocks: 1006-1016
 14 39. Assembly District 39.
 15 Within Queens County
 16 Within Queens Borough:
 17 Tract: 026902
 18 Tract: 027101
 19 Tract: 040101
 20 Tract: 040301
 21 Tract: 041100
 22 Tract: 041300
 23 Tract: 041500
 24 Tract: 046100
 25 Tract: 046300
 26 Tract: 050500
 27 Tract: 067100
 28 Tract: 026700 Blocks: 1000-1002 2000-2001 3000-3002
 29 Tract: 026901 Blocks: 1000-1004 2000 3000 4002
 30 Tract: 027102 Blocks: 2000-2001
 31 Tract: 028100 Blocks: 2001-2002 3000-3001 4000-4001
 32 Tract: 028300 Blocks: 2000-2001 3000-3001 4000-4001 5000-5001
 33 Tract: 028500 Blocks: 1002 2000-2001 3000-3001 4000-4001
 34 Tract: 028700 Blocks: 1002 2000-2001 3000-3005 4001
 35 Tract: 028900 Blocks: 1003 2000-2001 3000-3002 3005
 36 Tract: 037501 Blocks: 1002-1004
 37 Tract: 040102 Blocks: 1002 2003
 38 Tract: 040302 Blocks: 1004-1005
 39 Tract: 040501 Blocks: 1003-1006
 40 Tract: 040701 Blocks: 2000-2003
 41 Tract: 040901 Blocks: 2000-2002
 42 Tract: 042700 Blocks: 1000-1004 2000-2002
 43 Tract: 043900 Blocks: 1000-1004 2000-2001 2004-2005
 44 Tract: 044301 Blocks: 1000-1006 2000 2002
 45 Tract: 044302 Blocks: 1000-1006
 46 Tract: 045700 Blocks: 1001-1002 1005 2000-2002
 47 Tract: 045900 Blocks: 1000-1005 2001-2002
 48 Tract: 046500 Blocks: 1006-1009 2004-2006
 49 Tract: 046700 Blocks: 1002 2000-2001 3000-3001 4000-4003
 50 Tract: 046901 Blocks: 1000-1001 2000 3000-3001
 51 Tract: 046902 Blocks: 1003 2000-2001
 52 Tract: 047100 Blocks: 1000-1001
 53 Tract: 047500 Block: 1000
 54 Tract: 050700 Blocks: 1000-1007 1011-1013 2000-2010
 55 Tract: 066301 Blocks: 1000-1012
 56 Tract: 066900 Block: 1000

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A. 9040--A

1 Tract: 067900 Blocks: 1000-1004 2000-2002
 2 Tract: 068300 Blocks: 1001-1002 2002-2003 2006 3001 3003
 3 Tract: 068700 Blocks: 1000-1002 2000-2003 3000-3003 3008-3013
 4 3016-3018
 5 Tract: 069500 Blocks: 2000-2004
 6 Tract: 071702 Blocks: 2006-2012 2016-2017
 7 40. Assembly District 40.
 8 Within Queens County
 9 Within Queens Borough:
 10 Tract: 084902
 11 Tract: 085300
 12 Tract: 085500
 13 Tract: 085700
 14 Tract: 086300
 15 Tract: 086500
 16 Tract: 086900
 17 Tract: 087100
 18 Tract: 088902
 19 Tract: 104700
 20 Tract: 115100
 21 Tract: 115500
 22 Tract: 115700
 23 Tract: 115900
 24 Tract: 116100
 25 Tract: 116301
 26 Tract: 116302
 27 Tract: 116700
 28 Tract: 118700
 29 Tract: 118900
 30 Tract: 119100
 31 Tract: 038301 Blocks: 1000-1001 1010-1012 1026-1027
 32 Tract: 079701 Blocks: 1000 2000
 33 Tract: 084901 Blocks: 1000-1001 2000-2005
 34 Tract: 085900 Blocks: 1000-1003 2000-2002
 35 Tract: 086100 Blocks: 1000 2000-2005
 36 Tract: 088903 Blocks: 1003-1014 2000-2005 3000-3003
 37 Tract: 101700 Blocks: 3005 3010 5002-5012
 38 Tract: 103300 Blocks: 2000-2007 3000-3009 4000-4008
 39 Tract: 103900 Blocks: 1010-1012 2010-2013
 40 Tract: 105900 Blocks: 1000-1011 2000-2010 3000-3011 4000-4002
 41 4004-4015
 42 Tract: 114100 Block: 1008
 43 Tract: 114700 Blocks: 1002-1006 2002-2009
 44 Tract: 117100 Blocks: 1000-1013 2000-2006 3001-3009
 45 Tract: 118500 Blocks: 1007-1010 2000-2003
 46 Tract: 119300 Blocks: 2001-2002
 47 Tract: 119500 Block: 1009
 48 Tract: 119900 Blocks: 1000-1007
 49 Tract: 120100 Blocks: 1003-1004
 50 Tract: 120701 Blocks: 1000-1003
 51 41. Assembly District 41.
 52 Within Kings County
 53 Within Brooklyn Borough:
 54 Tract: 054600
 55 Tract: 054800
 56 Tract: 055000

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S. 8185--A

38

A. 9040--A

1 Tract: 056000
 2 Tract: 056200
 3 Tract: 056400
 4 Tract: 056600
 5 Tract: 056800
 6 Tract: 057000
 7 Tract: 057200
 8 Tract: 057400
 9 Tract: 057600
 10 Tract: 057800
 11 Tract: 059402
 12 Tract: 059403
 13 Tract: 059404
 14 Tract: 059600
 15 Tract: 059800
 16 Tract: 062600
 17 Tract: 064200
 18 Tract: 064400
 19 Tract: 064600
 20 Tract: 064800
 21 Tract: 065000
 22 Tract: 073200
 23 Tract: 073400
 24 Tract: 073600
 25 Tract: 073800
 26 Tract: 074000
 27 Tract: 074600
 28 Tract: 075600
 29 Tract: 075800
 30 Tract: 093200
 31 Tract: 053800 Blocks: 1000-1001 2000-2003
 32 Tract: 054400 Blocks: 1000-1001
 33 Tract: 055200 Blocks: 1000-1002
 34 Tract: 055800 Blocks: 1000-1001
 35 Tract: 059200 Blocks: 1000-1003 2000-2003 3000-3001
 36 Tract: 060000 Blocks: 1000-1002 2000-2005 3000-3008 4000-4001
 37 Tract: 060800 Blocks: 1000-1008 1023-1024 1035 1037
 38 Tract: 062200 Blocks: 1000-1009 2000-2007
 39 Tract: 062800 Blocks: 2000-2003
 40 Tract: 063200 Blocks: 1001-1002 2002
 41 Tract: 063800 Blocks: 2001-2003
 42 Tract: 064000 Blocks: 2000-2004
 43 Tract: 066600 Block: 1012
 44 Tract: 067600 Block: 2007
 45 Tract: 072200 Blocks: 2000-2005
 46 Tract: 072400 Blocks: 2000-2007
 47 Tract: 072600 Blocks: 1000 1007-1018
 48 Tract: 072800 Blocks: 1005-1007 2000-2003
 49 Tract: 073000 Blocks: 1002-1007 2000-2005
 50 Tract: 074200 Blocks: 1000-1002 1004-1005
 51 Tract: 074400 Blocks: 1000-1002 2000-2002 2004
 52 Tract: 077600 Blocks: 1000-1002 2000-2002 3000-3004
 53 Tract: 084000 Blocks: 2000-2002
 54 Tract: 084600 Blocks: 2000-2003
 55 Tract: 094401 Blocks: 1000-1001 2000-2007
 56 42. Assembly District 42.

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39

A. 9040--A

1 Within Kings County
 2 Within Brooklyn Borough:
 3 Tract: 050600
 4 Tract: 050801
 5 Tract: 050804
 6 Tract: 051001
 7 Tract: 051002
 8 Tract: 051200
 9 Tract: 051400
 10 Tract: 051601
 11 Tract: 051602
 12 Tract: 051800
 13 Tract: 074800
 14 Tract: 075000
 15 Tract: 075200
 16 Tract: 075400
 17 Tract: 076600
 18 Tract: 077000
 19 Tract: 077200
 20 Tract: 077400
 21 Tract: 078601
 22 Tract: 078602
 23 Tract: 078801
 24 Tract: 078802
 25 Tract: 079001
 26 Tract: 079002
 27 Tract: 079201
 28 Tract: 079202
 29 Tract: 079400
 30 Tract: 082400
 31 Tract: 082600
 32 Tract: 082800
 33 Tract: 017700 Block: 1013
 34 Tract: 046000 Blocks: 3000-3002
 35 Tract: 049200 Block: 1000
 36 Tract: 050402 Block: 2003
 37 Tract: 052000 Blocks: 1000-1001 2000-2010
 38 Tract: 052800 Blocks: 1003-1004
 39 Tract: 053200 Blocks: 1000 1003
 40 Tract: 074200 Blocks: 1003 2000-2002
 41 Tract: 074400 Blocks: 1003 2003
 42 Tract: 076000 Blocks: 1000-1003 2000-2002
 43 Tract: 076200 Blocks: 1000-1002 3000
 44 Tract: 076400 Blocks: 1000-1001 2000 3000-3003
 45 Tract: 077600 Blocks: 1003-1004
 46 Tract: 078400 Block: 1003
 47 Tract: 079602 Block: 2002
 48 Tract: 082000 Block: 3001
 49 Tract: 082200 Block: 4001
 50 Tract: 083000 Blocks: 1000-1005 2000-2001 4000
 51 Tract: 085400 Blocks: 1000 1003-1005 2005-2008
 52 Tract: 085600 Blocks: 1001-1002 2001-2002 3000-3003
 53 Tract: 152200 Blocks: 1001-1003 3000-3001 3007-3008
 54 43. Assembly Districts 43.
 55 Within Kings County
 56 Within Brooklyn Borough:

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A. 9040--A

1 Tract: 031701
 2 Tract: 031702
 3 Tract: 031900
 4 Tract: 032100
 5 Tract: 032900
 6 Tract: 033100
 7 Tract: 033300
 8 Tract: 033500
 9 Tract: 033701
 10 Tract: 033702
 11 Tract: 033900
 12 Tract: 034100
 13 Tract: 035101
 14 Tract: 035102
 15 Tract: 035301
 16 Tract: 035302
 17 Tract: 050803
 18 Tract: 079601
 19 Tract: 079801
 20 Tract: 079802
 21 Tract: 080000
 22 Tract: 080200
 23 Tract: 080400
 24 Tract: 080600
 25 Tract: 080800
 26 Tract: 081000
 27 Tract: 081800
 28 Tract: 087401
 29 Tract: 087600
 30 Tract: 088001
 31 Tract: 031300 Blocks: 2002 3002
 32 Tract: 031500 Blocks: 2001 3001
 33 Tract: 032700 Blocks: 1000-1001 2002-2004 3000-3003
 34 Tract: 034300 Blocks: 1000-1003 2000-2001 3000
 35 Tract: 034500 Blocks: 1000-1001 2002-2003
 36 Tract: 035500 Blocks: 1002 2001-2002 3000-3002
 37 Tract: 079602 Blocks: 1000-1001 2000-2001
 38 Tract: 081400 Blocks: 1000-1002 2000-2003
 39 Tract: 081600 Blocks: 1000-1005 2002-2003
 40 Tract: 082000 Blocks: 1000-1001 2000 3000
 41 Tract: 082200 Blocks: 1000 2000 3000 4000
 42 Tract: 087000 Block: 3002
 43 Tract: 087200 Blocks: 1000-1002
 44 Tract: 087800 Block: 2001
 45 44. Assembly District 44.
 46 Within Kings County
 47 Within Brooklyn Borough:
 48 Tract: 013900
 49 Tract: 014101
 50 Tract: 014901
 51 Tract: 015100
 52 Tract: 015300
 53 Tract: 016700
 54 Tract: 016900
 55 Tract: 017100
 56 Tract: 021500

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S. 8185--A

41

A. 9040--A

1 Tract: 022600
 2 Tract: 048200
 3 Tract: 048600
 4 Tract: 048800
 5 Tract: 049000
 6 Tract: 049400
 7 Tract: 049600
 8 Tract: 049800
 9 Tract: 050001
 10 Tract: 050002
 11 Tract: 050202
 12 Tract: 050401
 13 Tract: 052600
 14 Tract: 012902 Blocks: 2000 2002 2005
 15 Tract: 013500 Blocks: 1001 2001-2002
 16 Tract: 013700 Blocks: 1001 2000-2001 3000-3003
 17 Tract: 014902 Blocks: 1000-1002 2001-2003 3000 3002-3003
 18 Tract: 015500 Blocks: 2000-2001 3000-3001 4000-4001
 19 Tract: 016100 Blocks: 1000-1001 2000 3000-3001
 20 Tract: 016300 Blocks: 1000 2000-2002 3000
 21 Tract: 016500 Blocks: 3001-3002 4000-4001
 22 Tract: 017500 Block: 1001
 23 Tract: 017700 Blocks: 1000-1012 1014
 24 Tract: 020300 Blocks: 1001-1005 2000-2002
 25 Tract: 020500 Blocks: 1000-1002 2000-2002 3000-3001
 26 Tract: 020700 Blocks: 1000-1001 2001-2002
 27 Tract: 021300 Blocks: 1002-1003
 28 Tract: 022800 Blocks: 1000-1003 2000-2002 3000-3002
 29 Tract: 030500 Blocks: 2002 3002 4002
 30 Tract: 046000 Blocks: 1000-1003 2000-2001 3003-3007
 31 Tract: 047800 Blocks: 1000 2000-2003 3000-3005
 32 Tract: 048400 Blocks: 1000-1004 2000-2002
 33 Tract: 049200 Blocks: 1001-1003 2000-2002 3000-3001
 34 Tract: 050402 Blocks: 1000-1002 2000-2002
 35 Tract: 052000 Blocks: 1002-1006 3000-3001
 36 Tract: 052800 Blocks: 1000-1002 2000-2002
 37 Tract: 076400 Block: 2001
 38 Tract: 150200 Blocks: 1000-1004 2000-2006 3000 3003-3012
 39 Tract: 152200 Blocks: 1000 1004-1011 2000-2002 3002-3006 3009-3010
 40 45. Assembly District 45.
 41 Within Kings County
 42 Within Brooklyn Borough:
 43 Tract: 037000
 44 Tract: 037401
 45 Tract: 037402
 46 Tract: 038600
 47 Tract: 038800
 48 Tract: 039000
 49 Tract: 039200
 50 Tract: 039400
 51 Tract: 039600
 52 Tract: 039800
 53 Tract: 041401
 54 Tract: 041402
 55 Tract: 041600
 56 Tract: 041800

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42

A. 9040--A

1 Tract: 042000
 2 Tract: 042200
 3 Tract: 044200
 4 Tract: 054200
 5 Tract: 055400
 6 Tract: 055600
 7 Tract: 058000
 8 Tract: 058200
 9 Tract: 058400
 10 Tract: 058600
 11 Tract: 058800
 12 Tract: 059000
 13 Tract: 060600
 14 Tract: 061002
 15 Tract: 061003
 16 Tract: 061004
 17 Tract: 061200
 18 Tract: 061600
 19 Tract: 062000
 20 Tract: 030800 Blocks: 1000-1005 1009
 21 Tract: 034800 Blocks: 1000-1001 1004-1005
 22 Tract: 035400 Blocks: 1000-1002 1009-1010
 23 Tract: 036002 Block: 1002
 24 Tract: 036600 Blocks: 1000-1007 1010-1011
 25 Tract: 038200 Blocks: 1000-1002 3000
 26 Tract: 040000 Blocks: 1000-1001 1004-1005
 27 Tract: 040200 Blocks: 4000-4001 4006-4008
 28 Tract: 041000 Block: 1000
 29 Tract: 041200 Blocks: 1000 1003
 30 Tract: 043800 Blocks: 1000-1002 2000-2002
 31 Tract: 044000 Blocks: 1000-1004 2000-2004 3000-3001 3005
 32 Tract: 053800 Blocks: 3003-3005
 33 Tract: 054400 Blocks: 2000-2003 3000-3003
 34 Tract: 055200 Blocks: 2000-2003 3000-3005
 35 Tract: 055800 Blocks: 1002 2000-2005
 36 Tract: 059200 Blocks: 2004 3002
 37 Tract: 060000 Blocks: 3009-3010 4002-4004 5000-5005
 38 Tract: 060800 Blocks: 1009-1022 1025-1034 1036 1038 2000-2007
 39 3000-3009
 40 Tract: 076800 Blocks: 3000 3003-3006
 41 Tract: 990100 Blocks: 0001-0003
 42 46. Assembly District 46.
 43 Within Kings County.
 44 Within Brooklyn Borough:
 45 Tract: 005800
 46 Tract: 006000
 47 Tract: 006200
 48 Tract: 006400
 49 Tract: 013800
 50 Tract: 014000
 51 Tract: 014200
 52 Tract: 015200
 53 Tract: 015400
 54 Tract: 016000
 55 Tract: 016400
 56 Tract: 016600

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43

A. 9040--A

1 Tract: 016800
 2 Tract: 031402
 3 Tract: 032600
 4 Tract: 032800
 5 Tract: 033000
 6 Tract: 033600
 7 Tract: 034000
 8 Tract: 034200
 9 Tract: 035000
 10 Tract: 035200
 11 Tract: 035601
 12 Tract: 035602
 13 Tract: 036001
 14 Tract: 036200
 15 Tract: 036400
 16 Tract: 004400 Blocks: 2005
 17 Tract: 004600 Blocks: 1000-1002 1009-1010
 18 Tract: 005000 Blocks: 2003 3000-3003
 19 Tract: 005201 Blocks: 1000 1005-1006
 20 Tract: 005202 Blocks: 1000 2000-2003
 21 Tract: 005400 Blocks: 1000-1002 2000-2002 3000-3002
 22 Tract: 005601 Blocks: 1000-1002 2000-2004
 23 Tract: 005602 Blocks: 1000-1004
 24 Tract: 006600 Blocks: 1002 2000-2001 3002
 25 Tract: 013400 Blocks: 1014-1016 2001-2002 3001-3003
 26 Tract: 013600 Blocks: 1003-1006 2000-2001 3000-3001 4000-4001
 27 Tract: 014800 Blocks: 2000-2003
 28 Tract: 015000 Blocks: 2000-2003
 29 Tract: 016200 Blocks: 1000-1002 2000-2005 2010-2011
 30 Tract: 017400 Blocks: 0001 1000 1003-1005
 31 Tract: 017600 Blocks: 0001 1003-1005
 32 Tract: 020200 Blocks: 2001-2003
 33 Tract: 020400 Blocks: 2001-2003
 34 Tract: 020600 Blocks: 2001-2003
 35 Tract: 028000 Blocks: 0001 1002-1004
 36 Tract: 028200 Blocks: 0001 1003-1005
 37 Tract: 028600 Blocks: 0001-0002 1001-1003
 38 Tract: 029200 Blocks: 0001 3003
 39 Tract: 029400 Blocks: 0001 1003-1010
 40 Tract: 030400 Blocks: 0001-0002 1005-1010 2004 3006-3008
 41 Tract: 030600 Blocks: 1006-1010
 42 Tract: 030800 Blocks: 1006-1008 1010-1012
 43 Tract: 031401 Blocks: 0001 1005 2000-2002 3000-3011 4000 5000-5001
 44 6000-6001
 45 Tract: 034800 Blocks: 1002-1003 1006-1028 2000-2003
 46 Tract: 035400 Blocks: 1003-1008 2000-2002 3000
 47 Tract: 036002 Blocks: 1000-1001 2000-2002
 48 Tract: 036600 Blocks: 1008-1009 2000-2002 3000-3003
 49 Tract: 990100 Blocks: 0004-0008
 50 47. Assembly District 47.
 51 Within Kings County
 52 Within Brooklyn Borough:
 53 Tract: 017000
 54 Tract: 017200
 55 Tract: 017800
 56 Tract: 018000

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44

A. 9040--A

1 Tract: 027000
 2 Tract: 028800
 3 Tract: 029000
 4 Tract: 029600
 5 Tract: 029800
 6 Tract: 030000
 7 Tract: 030200
 8 Tract: 040400
 9 Tract: 040600
 10 Tract: 040800
 11 Tract: 042400
 12 Tract: 042600
 13 Tract: 042800
 14 Tract: 043000
 15 Tract: 043200
 16 Tract: 043400
 17 Tract: 043600
 18 Tract: 017400 Blocks: 1001-1002 2000-2002
 19 Tract: 017600 Blocks: 1000-1002 2000-2003
 20 Tract: 018200 Blocks: 2003-2006
 21 Tract: 018400 Blocks: 1003-1004 2002 2003
 22 Tract: 024600 Block: 2002
 23 Tract: 025400 Blocks: 1000-1002
 24 Tract: 025600 Blocks: 1000-1001 1004-1005
 25 Tract: 025800 Blocks: 1000-1002
 26 Tract: 026600 Blocks: 1000-1001
 27 Tract: 026800 Blocks: 1000-1001 2002-2003
 28 Tract: 027200 Blocks: 1001 2001 3000-3001
 29 Tract: 027600 Blocks: 3002-3003
 30 Tract: 027800 Blocks: 1001-1003 2000-2004
 31 Tract: 028000 Blocks: 1000-1001 2000-2005
 32 Tract: 028200 Blocks: 1000-1002 2000-2003 3000-3001
 33 Tract: 028400 Blocks: 1001 2000-2002 3000-3002
 34 Tract: 028600 Blocks: 1000 2000 3000 4000-4002 5000-5002
 35 Tract: 029200 Blocks: 1000-1002 2000-2003 3000-3002
 36 Tract: 029400 Blocks: 1000-1002
 37 Tract: 030400 Blocks: 1000-1004 2000-2003 3000-3005
 38 Tract: 030600 Blocks: 1000-1005
 39 Tract: 031401 Blocks: 1000-1004
 40 Tract: 038200 Block: 2000
 41 Tract: 040000 Blocks: 1002-1003 2000-2001 3000-3003
 42 Tract: 040200 Blocks: 1000 2000-2003 3000-3001 4002-4005
 43 Tract: 041000 Blocks: 1001-1004 2000-2002
 44 Tract: 041200 Blocks: 1001-1002 2000-2003
 45 Tract: 043800 Blocks: 2003-2005
 46 Tract: 044000 Blocks: 3002 3004
 47 Tract: 044600 Blocks: 1000-1002
 48 48. Assembly District 48.
 49 Within Kings County
 50 Within Brooklyn Borough:
 51 Tract: 021600
 52 Tract: 021800
 53 Tract: 022000
 54 Tract: 022200
 55 Tract: 022400
 56 Tract: 023000

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S. 8185--A

45

A. 9040--A

1 Tract: 023200
2 Tract: 023400
3 Tract: 023600
4 Tract: 023800
5 Tract: 024000
6 Tract: 024200
7 Tract: 024400
8 Tract: 044400
9 Tract: 044800
10 Tract: 045000
11 Tract: 045200
12 Tract: 045400
13 Tract: 045600
14 Tract: 045800
15 Tract: 046201
16 Tract: 046202
17 Tract: 046400
18 Tract: 046800
19 Tract: 047000
20 Tract: 047200
21 Tract: 047400
22 Tract: 047600
23 Tract: 048000
24 Tract: 053000
25 Tract: 053400
26 Tract: 019200 Blocks: 1000-1001 2000-2001 2004-2005
27 Tract: 021400 Blocks: 2000-2002 3001-3002 3006
28 Tract: 022800 Blocks: 2003 3003
29 Tract: 024600 Blocks: 1000-1002 3000-3002
30 Tract: 044000 Block: 3003
31 Tract: 044600 Blocks: 2000-2005
32 Tract: 047800 Blocks: 1001-1002 2004
33 Tract: 048400 Blocks: 3000-3003
34 Tract: 053200 Blocks: 1001-1002 1004-1006 2000-2005
35 Tract: 053800 Blocks: 3000-3002
36 Tract: 076000 Blocks: 3000-3001
37 Tract: 076200 Blocks: 2000-2002 3001
38 Tract: 076800 Blocks: 1000-1010 2000-2007 3001-3002
39 49. Assembly District 49.
40 Within Kings County
41 Within Brooklyn Borough:
42 Tract: 010401
43 Tract: 010402
44 Tract: 010601
45 Tract: 010602
46 Tract: 010801
47 Tract: 010802
48 Tract: 011600
49 Tract: 011800
50 Tract: 012000
51 Tract: 012801
52 Tract: 013200
53 Tract: 018600
54 Tract: 018800
55 Tract: 019000
56 Tract: 019400

S. 8185--A

46

A. 9040--A

1 Tract: 019600
 2 Tract: 019800
 3 Tract: 020000
 4 Tract: 020800
 5 Tract: 021000
 6 Tract: 021200
 7 Tract: 024800
 8 Tract: 025000
 9 Tract: 025200
 10 Tract: 026000
 11 Tract: 026200
 12 Tract: 026400
 13 Tract: 027400
 14 Tract: 009401 Block: 2001
 15 Tract: 009402 Block: 2001
 16 Tract: 009800 Blocks: 3000-3001
 17 Tract: 010000 Blocks: 1000-1001 2000-2001
 18 Tract: 010200 Blocks: 1000-1002 2002
 19 Tract: 011400 Blocks: 1002-1004 2000-2003 3000-3002
 20 Tract: 012600 Blocks: 3000-3001 3005-3007
 21 Tract: 013400 Blocks: 1002-1008
 22 Tract: 013600 Blocks: 1000-1002
 23 Tract: 014800 Blocks: 1000-1002
 24 Tract: 015000 Blocks: 1000-1002
 25 Tract: 018200 Blocks: 1000-1003 2000-2002
 26 Tract: 018400 Blocks: 1000-1002 2000-2001
 27 Tract: 019200 Blocks: 2002-2003 2006 3000-3004 4000-4001
 28 Tract: 020200 Blocks: 1000-1002 2000
 29 Tract: 020400 Blocks: 1000-1002 2000
 30 Tract: 020600 Blocks: 1000-1003 2000
 31 Tract: 021400 Blocks: 1000-1001 2003 3000 3003-3005
 32 Tract: 024600 Blocks: 2000-2001
 33 Tract: 025400 Blocks: 2000-2003 3000-3003
 34 Tract: 025600 Blocks: 1002-1003 2000-2003
 35 Tract: 025800 Blocks: 2000-2002 3000-3002
 36 Tract: 026600 Blocks: 1002 2000-2002 3000-3002
 37 Tract: 026800 Blocks: 2000-2001 3000-3003 4000-4001
 38 Tract: 027200 Blocks: 1000 2000 3002
 39 Tract: 027600 Blocks: 1000-1001 2000-2001 3000-3001
 40 Tract: 027800 Block: 1000
 41 Tract: 028400 Block: 1000
 42 50. Assembly District 50.
 43 Within Kings County.
 44 Within Brooklyn Borough:
 45 Tract: 049700
 46 Tract: 049900
 47 Tract: 050100
 48 Tract: 051500
 49 Tract: 051700
 50 Tract: 051900
 51 Tract: 052900
 52 Tract: 053101
 53 Tract: 053102
 54 Tract: 053300
 55 Tract: 053500
 56 Tract: 053700

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A. 9040--A

1 Tract: 054700
 2 Tract: 054900
 3 Tract: 055300
 4 Tract: 055500
 5 Tract: 055700
 6 Tract: 056100
 7 Tract: 056301
 8 Tract: 056302
 9 Tract: 056500
 10 Tract: 056900
 11 Tract: 057100
 12 Tract: 057300
 13 Tract: 057500
 14 Tract: 057901
 15 Tract: 057902
 16 Tract: 058901
 17 Tract: 058902
 18 Tract: 059100
 19 Tract: 059300
 20 Tract: 044901 Blocks: 2000-2016 3000-3008 4000-4001
 21 Tract: 044902 Blocks: 1000-1028
 22 Tract: 047700 Blocks: 1000-1024 2001-2002 2005-2006 2008 2011
 23 Tract: 049500 Blocks: 1000-1002 2000-2002 3000-3002
 24 Tract: 050300 Blocks: 1000-1003 3000-3003
 25 Tract: 050900 Blocks: 1000-1003 1008 2000-2002
 26 Tract: 051300 Blocks: 1000-1003 3000-3005 4000-4002 4005
 27 Tract: 052500 Blocks: 1003-1010 2000-2001
 28 Tract: 053900 Block: 2000
 29 Tract: 054500 Blocks: 2000 3000 4000 5000-5001 6000
 30 Tract: 055100 Blocks: 1000-1010 2000 3000-3002 4001
 31 51. Assembly District 51.
 32 Within Kings County
 33 Within Brooklyn Borough:
 34 Tract: 002200
 35 Tract: 001801
 36 Tract: 002000
 37 Tract: 002200
 38 Tract: 005303
 39 Tract: 007000
 40 Tract: 007200
 41 Tract: 007400
 42 Tract: 007600
 43 Tract: 007800
 44 Tract: 008000
 45 Tract: 008200
 46 Tract: 008400
 47 Tract: 008500
 48 Tract: 008600
 49 Tract: 008800
 50 Tract: 009001
 51 Tract: 009002
 52 Tract: 009201
 53 Tract: 009202
 54 Tract: 009600
 55 Tract: 010100
 56 Tract: 011000

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48

A. 9040--A

1 Tract: 011200
 2 Tract: 011700
 3 Tract: 012200
 4 Tract: 014102
 5 Tract: 014300
 6 Tract: 014500
 7 Tract: 014700
 8 Tract: 001802 Blocks: 1000-1011
 9 Tract: 001803 Blocks: 1000-1010
 10 Tract: 001804 Blocks: 1000-1001
 11 Tract: 003000 Blocks: 1000-1005 2000
 12 Tract: 005100 Blocks: 1003-1005 2003-2005 3005-3008
 13 Tract: 005301 Blocks: 1000-1014 2000-2018
 14 Tract: 005302 Blocks: 0002 1000-1013 2000-2013 3000-3005
 15 Tract: 005900 Blocks: 1000-1008 2000-2015 2017-2018 2022 2024-2025
 16 2027-2032
 17 Tract: 006500 Blocks: 7003-7006
 18 Tract: 006800 Block: 1000
 19 Tract: 007700 Blocks: 3009-3012
 20 Tract: 009401 Blocks: 1000-1001 2000
 21 Tract: 009402 Blocks: 1000-1001 2000
 22 Tract: 009800 Blocks: 1000-1001 2000-2001 4000-4001
 23 Tract: 010000 Blocks: 3000-3001 4000-4001
 24 Tract: 010200 Blocks: 2000-2001 3000-3001
 25 Tract: 011400 Blocks: 1000-1001
 26 Tract: 011902 Blocks: 1006-1012
 27 Tract: 012100 Blocks: 2000 2002-2004
 28 Tract: 012600 Blocks: 1000-1007 2000-2005
 29 Tract: 014902 Blocks: 2000 3001
 30 Tract: 017500 Block: 1000
 31 Tract: 150200 Blocks: 3001-3002
 32 52. Assembly District 52.
 33 Within Kings County
 34 Within Brooklyn Borough:
 35 Tract: 000100
 36 Tract: 000301
 37 Tract: 000501
 38 Tract: 000502
 39 Tract: 000700
 40 Tract: 000900
 41 Tract: 001100
 42 Tract: 001300
 43 Tract: 002100
 44 Tract: 003700
 45 Tract: 003900
 46 Tract: 004100
 47 Tract: 004300
 48 Tract: 004500
 49 Tract: 004700
 50 Tract: 004900
 51 Tract: 006300
 52 Tract: 006700
 53 Tract: 006901
 54 Tract: 006902
 55 Tract: 007100
 56 Tract: 007500

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A. 9040--A

1 Tract: 011901
 2 Tract: 012700
 3 Tract: 012901
 4 Tract: 013100
 5 Tract: 013300
 6 Tract: 015700
 7 Tract: 015900
 8 Tract: 021100
 9 Tract: 054300
 10 Tract: 001501 Blocks: 1000-1011
 11 Tract: 001502 Blocks: 1000-1016
 12 Tract: 002300 Blocks: 1003 1005 3004-3006
 13 Tract: 003300 Blocks: 2005-2007
 14 Tract: 005100 Blocks: 1000-1002 1006-1008 2000-2002 2006 3000-3004
 15 Tract: 005900 Blocks: 2016 2019-2021 2023 2026
 16 Tract: 006500 Blocks: 1000-1001 2000-2001 3000-3001 4000-4001
 17 5000-5001 6000-6003 7000-7002
 18 Tract: 007700 Blocks: 1000-1004 2000-2005 3000-3008 3013 4000-4003
 19 Tract: 011902 Blocks: 1000-1005
 20 Tract: 012100 Blocks: 1000-1003 2001
 21 Tract: 012902 Blocks: 1000-1001 2001 2003-2004 2006
 22 Tract: 013500 Blocks: 1000 2000 2003 3000-3001
 23 Tract: 013700 Block: 1000
 24 Tract: 015500 Blocks: 1000-1001
 25 Tract: 016100 Blocks: 1002-1003 4000-4004
 26 Tract: 016300 Blocks: 3001 4000
 27 Tract: 016500 Blocks: 1000-1001 2000-2002 3000
 28 Tract: 020500 Block: 3002
 29 Tract: 020700 Blocks: 2000 3000-3001
 30 Tract: 053900 Blocks: 1000-1004
 31 Tract: 054500 Blocks: 1000-1002 2001-2002
 32 53. Assembly District 53.
 33 Within Kings County
 34 Within Brooklyn Borough:
 35 Tract: 038900
 36 Tract: 039100
 37 Tract: 039300
 38 Tract: 039500
 39 Tract: 041900
 40 Tract: 042100
 41 Tract: 042300
 42 Tract: 042500
 43 Tract: 042700
 44 Tract: 042900
 45 Tract: 043100
 46 Tract: 043300
 47 Tract: 044100
 48 Tract: 044300
 49 Tract: 044500
 50 Tract: 044700
 51 Tract: 045300
 52 Tract: 048100
 53 Tract: 048500
 54 Tract: 048900
 55 Tract: 049100
 56 Tract: 049301

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S. 8185--A

50

A. 9040--A

1 Tract: 049302
2 Tract: 050500
3 Tract: 050700
4 Tract: 051100
5 Tract: 052300
6 Tract: 052700
7 Tract: 041700 Blocks: 1000-1001 3000 4000
8 Tract: 043500 Blocks: 3000-3001
9 Tract: 043900 Blocks: 2003-2004 3000-3005
10 Tract: 044901 Blocks: 1000-1005 4002-4005
11 Tract: 044902 Blocks: 2000-2009 3000-3029
12 Tract: 047700 Blocks: 2000 2003-2004 2007 2009-2010
13 Tract: 049500 Blocks: 1003 2003-2004 3003-3004
14 Tract: 050300 Blocks: 2000-2004
15 Tract: 050900 Blocks: 1004-1007 2003-2004
16 Tract: 051300 Blocks: 2000-2002 3006-3010 4003-4004 4006-4012
17 Tract: 052500 Blocks: 1000-1002
18 Tract: 055100 Blocks: 2001-2002 4000
19 54. Assembly District 54.
20 Within Kings County
21 Within Brooklyn Borough:
22 Tract: 039700
23 Tract: 039900
24 Tract: 040100
25 Tract: 040300
26 Tract: 040500
27 Tract: 040700
28 Tract: 040900
29 Tract: 041100
30 Tract: 041300
31 Tract: 041500
32 Tract: 043700
33 Tract: 114201
34 Tract: 114202
35 Tract: 114600
36 Tract: 115000
37 Tract: 115200
38 Tract: 116600
39 Tract: 116800
40 Tract: 117000
41 Tract: 117201
42 Tract: 117202
43 Tract: 117400
44 Tract: 117601
45 Tract: 117602
46 Tract: 117800
47 Tract: 118000
48 Tract: 118201
49 Tract: 118202
50 Tract: 118400
51 Tract: 118600
52 Tract: 118800
53 Tract: 119000
54 Tract: 119200
55 Tract: 041700 Blocks: 2000-2001 3001 4001
56 Tract: 043500 Blocks: 1000-1003 2000-2002 3002

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S. 8185--A

51

A. 9040--A

1 Tract: 043900 Blocks: 1000-1009 2000-2002
 2 Tract: 114400 Blocks: 2000-2002 3000-3002 4000-4002
 3 Tract: 116200 Blocks: 1000-1002
 4 Tract: 116400 Blocks: 1000-1004
 5 Tract: 119400 Blocks: 1000-1004 2000-2004
 6 Tract: 119600 Blocks: 1000-1009 2000-2005 3003-3005 4003-4005
 7 Tract: 119800 Blocks: 1000-1003 1007-1008 2000-2007 3000-3007
 8 Tract: 120000 Blocks: 1003-1006
 9 Tract: 120200 Blocks: 1000-1002 2000-2005
 10 55. Assembly District 55.
 11 Within Kings County
 12 Within Brooklyn Borough:
 13 Tract: 030100
 14 Tract: 030300
 15 Tract: 034700
 16 Tract: 034901
 17 Tract: 034902
 18 Tract: 035701
 19 Tract: 035702
 20 Tract: 035900
 21 Tract: 036100
 22 Tract: 036300
 23 Tract: 036501
 24 Tract: 036502
 25 Tract: 036700
 26 Tract: 036900
 27 Tract: 037100
 28 Tract: 037300
 29 Tract: 037700
 30 Tract: 037900
 31 Tract: 089400
 32 Tract: 089600
 33 Tract: 089800
 34 Tract: 090000
 35 Tract: 090200
 36 Tract: 090600
 37 Tract: 090800
 38 Tract: 091000
 39 Tract: 091200
 40 Tract: 091600
 41 Tract: 091800
 42 Tract: 092000
 43 Tract: 092400
 44 Tract: 030700 Blocks: 3010-3012
 45 Tract: 037500 Blocks: 1000-1003 2004-2005 3000-3001
 46 Tract: 089000 Blocks: 1000-1001 2000 6000-6002
 47 Tract: 089200 Blocks: 1000 2000 3000 3003 4000-4005
 48 Tract: 113200 Blocks: 3000-3001
 49 Tract: 114400 Blocks: 1000-1020 2003-2005 3003-3005 4003-4005
 50 Tract: 119800 Blocks: 1004-1006 1009-1012
 51 56. Assembly District 56.
 52 Within Kings County
 53 Within Brooklyn Borough:
 54 Tract: 024900
 55 Tract: 025100
 56 Tract: 025300

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S. 8185--A

52

A. 9040--A

1 Tract: 025500
2 Tract: 025700
3 Tract: 025901
4 Tract: 025902
5 Tract: 026100
6 Tract: 026300
7 Tract: 026500
8 Tract: 026700
9 Tract: 026900
10 Tract: 027100
11 Tract: 027300
12 Tract: 027500
13 Tract: 027700
14 Tract: 027900
15 Tract: 028100
16 Tract: 028300
17 Tract: 028501
18 Tract: 028502
19 Tract: 028700
20 Tract: 028900
21 Tract: 029100
22 Tract: 029300
23 Tract: 029500
24 Tract: 029700
25 Tract: 029900
26 Tract: 030900
27 Tract: 031100
28 Tract: 038100
29 Tract: 038300
30 Tract: 038500
31 Tract: 038700
32 Tract: 024700 Blocks: 1000-1003
33 Tract: 030700 Blocks: 1000-1001 2000 3000-3009 3013
34 Tract: 031300 Blocks: 1000-1003 2000-2001 3000-3001 4000-4003
35 Tract: 031500 Blocks: 1000-1003 2000
36 Tract: 034300 Block: 4000
37 Tract: 034500 Blocks: 2000-2001
38 Tract: 037500 Blocks: 2000-2003 2006
39 57. Assembly District 57.
40 Within Kings County
41 Within Brooklyn Borough:
42 Tract: 002901
43 Tract: 003101
44 Tract: 003102
45 Tract: 003500
46 Tract: 017900
47 Tract: 018100
48 Tract: 018300
49 Tract: 018501
50 Tract: 018700
51 Tract: 019100
52 Tract: 019300
53 Tract: 019500
54 Tract: 019700
55 Tract: 019900
56 Tract: 020100

S. 8185--A

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A. 9040--A

- 1 Tract: 021700
- 2 Tract: 021900
- 3 Tract: 022100
- 4 Tract: 022700
- 5 Tract: 022900
- 6 Tract: 023100
- 7 Tract: 023300
- 8 Tract: 023500
- 9 Tract: 024100
- 10 Tract: 024300
- 11 Tract: 024500
- 12 Tract: 032300
- 13 Tract: 032500
- 14 Tract: 123700
- 15 Tract: 001501 Blocks: 2000-2012
- 16 Tract: 001502 Blocks: 1017-1018
- 17 Tract: 002300 Blocks: 1000-1002 1004 2000 3000-3003 3007-3009
- 18 Tract: 003300 Blocks: 1000-1001 2000-2004 2008-2011
- 19 Tract: 020300 Block: 1000
- 20 Tract: 021300 Blocks: 1000-1001 1004-1007 2000-2003 3000-3004
- 21 Tract: 024700 Blocks: 2000-2005
- 22 Tract: 030500 Blocks: 1000-1008 2000-2001 3000-3001 4000-4001
- 23 Tract: 031500 Blocks: 3000 4000-4003
- 24 Tract: 032700 Blocks: 2000-2001
- 25 58. Assembly District 58.
- 26 Within Kings County
- 27 Within Brooklyn Borough:
- 28 Tract: 078000
- 29 Tract: 078200
- 30 Tract: 083200
- 31 Tract: 083400
- 32 Tract: 083600
- 33 Tract: 083800
- 34 Tract: 084800
- 35 Tract: 085000
- 36 Tract: 085200
- 37 Tract: 085800
- 38 Tract: 086000
- 39 Tract: 086200
- 40 Tract: 086400
- 41 Tract: 086600
- 42 Tract: 086800
- 43 Tract: 088002
- 44 Tract: 088200
- 45 Tract: 088400
- 46 Tract: 088600
- 47 Tract: 088800
- 48 Tract: 092800
- 49 Tract: 093000
- 50 Tract: 093400
- 51 Tract: 093600
- 52 Tract: 093800
- 53 Tract: 094600
- 54 Tract: 096000
- 55 Tract: 096200
- 56 Tract: 097000

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A. 9040--A

1 Tract: 097400
 2 Tract: 098800
 3 Tract: 101200
 4 Tract: 101400
 5 Tract: 102000
 6 Tract: 102200
 7 Tract: 035500 Blocks: 1000-1001 2000
 8 Tract: 072600 Blocks: 1001-1006
 9 Tract: 078400 Blocks: 1000-1002 2000-2003
 10 Tract: 081400 Blocks: 1003-1005 2004-2005
 11 Tract: 081600 Blocks: 2000-2001
 12 Tract: 083000 Blocks: 2002-2004 3000-3001
 13 Tract: 084000 Blocks: 1000-1003 2003
 14 Tract: 084600 Blocks: 1000-1003
 15 Tract: 085400 Blocks: 1001-1002 2000-2004
 16 Tract: 085600 Blocks: 1000 2000
 17 Tract: 087000 Blocks: 1000-1002 2000-2003 3000-3001 3003
 18 Tract: 087200 Blocks: 2000-2002 3000-3003
 19 Tract: 087800 Blocks: 1000-1001 2000 3000-3002
 20 Tract: 089000 Blocks: 1002 2001 3000 4000-4001 5000-5002 6003-6004
 21 Tract: 089200 Blocks: 1001 2001 3001-3002
 22 Tract: 092200 Blocks: 2000-2006
 23 Tract: 094401 Blocks: 3000-3003 4000-4001
 24 Tract: 095000 Block: 2000
 25 Tract: 095800 Blocks: 1000-1001 1004
 26 Tract: 096400 Blocks: 1000-1001 1003-1004 2000 2003-2004
 27 Tract: 096800 Blocks: 1000-1004 2000-2003
 28 Tract: 098200 Block: 1002
 29 Tract: 098600 Blocks: 1001-1003 2001-2003
 30 Tract: 101600 Blocks: 1002-1003
 31 Tract: 109800 Blocks: 1003-1006 2002-2010 3001
 32 59. Assembly District 59.
 33 Within Kings County
 34 Within Brooklyn Borough:
 35 Tract: 063600
 36 Tract: 065200
 37 Tract: 065400
 38 Tract: 065600
 39 Tract: 065800
 40 Tract: 066000
 41 Tract: 066200
 42 Tract: 067000
 43 Tract: 067200
 44 Tract: 067400
 45 Tract: 067800
 46 Tract: 068000
 47 Tract: 068200
 48 Tract: 068600
 49 Tract: 068800
 50 Tract: 069000
 51 Tract: 069200
 52 Tract: 069601
 53 Tract: 069602
 54 Tract: 069800
 55 Tract: 070000
 56 Tract: 070201

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A. 9040--A

1 Tract: 070202
 2 Tract: 070203
 3 Tract: 070601
 4 Tract: 070602
 5 Tract: 072000
 6 Tract: 094402
 7 Tract: 095400
 8 Tract: 095600
 9 Tract: 096600
 10 Tract: 099000
 11 Tract: 099200
 12 Tract: 099400
 13 Tract: 099600
 14 Tract: 099800
 15 Tract: 100400
 16 Tract: 100600
 17 Tract: 100800
 18 Tract: 101000
 19 Tract: 102400
 20 Tract: 102600
 21 Tract: 102801
 22 Tract: 102802
 23 Tract: 103401
 24 Tract: 103402
 25 Tract: 062200 Block: 1010
 26 Tract: 062800 Blocks: 1000-1028 2004-2033 3000-3024 4000-4029
 27 Tract: 063200 Blocks: 1000 2000-2001
 28 Tract: 063800 Blocks: 1000-1003 2000
 29 Tract: 064000 Blocks: 1000-1003
 30 Tract: 066600 Blocks: 0001-0002 1000-1011 1013
 31 Tract: 067600 Blocks: 1000-1003 2000-2006
 32 Tract: 072200 Blocks: 1000-1008
 33 Tract: 072400 Blocks: 1000-1002
 34 Tract: 072800 Blocks: 1000-1004
 35 Tract: 073000 Blocks: 1000-1001
 36 Tract: 095000 Blocks: 1000-1006 2001-2004
 37 Tract: 095800 Blocks: 1002-1003 2000-2008
 38 Tract: 096400 Blocks: 1002 1005-1008 2001-2002 2005-2006
 39 Tract: 096800 Blocks: 1005-1006 2004-2005
 40 60. Assembly District 60.
 41 Within Kings County
 42 Within Brooklyn Borough:
 43 Tract: 098400
 44 Tract: 101800
 45 Tract: 105801
 46 Tract: 105804
 47 Tract: 107001
 48 Tract: 107002
 49 Tract: 107003
 50 Tract: 107800
 51 Tract: 110400
 52 Tract: 110600
 53 Tract: 111000
 54 Tract: 111600
 55 Tract: 111800
 56 Tract: 112000

S. 8185--A

56

A. 9040--A

- 1 Tract: 112200
- 2 Tract: 112400
- 3 Tract: 112600
- 4 Tract: 112800
- 5 Tract: 113000
- 6 Tract: 113400
- 7 Tract: 115600
- 8 Tract: 115800
- 9 Tract: 116000
- 10 Tract: 120801
- 11 Tract: 120802
- 12 Tract: 120803
- 13 Tract: 121000
- 14 Tract: 121400
- 15 Tract: 122000
- 16 Tract: 092200 Blocks: 1000-1006
- 17 Tract: 098200 Blocks: 1000-1001 2000-2005
- 18 Tract: 098600 Blocks: 1000 2000
- 19 Tract: 101600 Blocks: 1000-1001 1004-1005
- 20 Tract: 109800 Blocks: 1000-1002 2000-2001 3000 4000-4003 5000-5013
- 21 Tract: 113200 Blocks: 1000-1008 2000-2005
- 22 Tract: 116200 Blocks: 1003-1004 2000-2004 3000-3004
- 23 Tract: 116400 Blocks: 2000-2004 3000-3004
- 24 Tract: 119400 Blocks: 3000-3004
- 25 Tract: 119600 Blocks: 3000-3002 4000-4002
- 26 Tract: 120000 Blocks: 1000-1002 1007-1008 2000-2007
- 27 Tract: 120200 Blocks: 1003-1009
- 28 61. Assembly District 61.
- 29 Within New York County
- 30 Within Manhattan Borough:
- 31 Tract: 000100
- 32 Tract: 000500
- 33 Tract: 031703
- 34 Tract: 031704
- 35 Tract: 031900
- 36 Within Richmond County
- 37 Within Staten Island Borough:
- 38 Tract: 000300
- 39 Tract: 001100
- 40 Tract: 001700
- 41 Tract: 002100
- 42 Tract: 004003
- 43 Tract: 007700
- 44 Tract: 008100
- 45 Tract: 009701
- 46 Tract: 009702
- 47 Tract: 012500
- 48 Tract: 013301
- 49 Tract: 013302
- 50 Tract: 014100
- 51 Tract: 020701
- 52 Tract: 020702
- 53 Tract: 021300
- 54 Tract: 022300
- 55 Tract: 023100
- 56 Tract: 023900

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A. 9040--A

1 Tract: 024700
 2 Tract: 025100
 3 Within Kings County
 4 Within Brooklyn Borough:
 5 Tract: 001802 Block: 0001
 6 Tract: 001803 Blocks: 0001-0002
 7 Tract: 001804 Block: 0001
 8 Tract: 003400 Block: 0001
 9 Tract: 005301 Blocks: 0001-0002
 10 Tract: 005302 Blocks: 0001 0003-0004
 11 Within New York County
 12 Within Manhattan Borough:
 13 Tract: 000700 Blocks: 0001 1000-1004 7004 7006-7008 8000-8002 9000
 14 Tract: 000900 Blocks: 0001-0002 1003-1023 2000-2001
 15 Tract: 001300 Blocks: 1000-1002 2000-2009 3000-3005 4000-4008
 16 5000-5001 5003-5004
 17 Tract: 001501 Blocks: 1009-1010 1017
 18 Tract: 001502 Blocks: 1000-1004
 19 Within Richmond County
 20 Within Staten Island Borough:
 21 Tract: 000600 Block: 0001
 22 Tract: 000700 Blocks: 0001 1000-1003 2000-2002 3000-3002 4000-4007
 23 Tract: 000900 Blocks: 1000-1007 2000-2005
 24 Tract: 002700 Block: 2001
 25 Tract: 002900 Blocks: 1000-1008 2000 3004-3011 4000-4010
 26 Tract: 003300 Blocks: 1000-1006 2000-2005 2007-2012
 27 Tract: 003900 Block: 1000
 28 Tract: 004002 Blocks: 1003-1004 2000-2012
 29 Tract: 004004 Blocks: 1000-1001 1003-1005 2000-2008 2010 2012
 30 Tract: 004700 Blocks: 1000-1002 1016-1017
 31 Tract: 006700 Blocks: 1000-1010
 32 Tract: 007500 Blocks: 1000-1004 2000-2001 3000-3004
 33 Tract: 010500 Blocks: 1000-1005 5000-5008
 34 Tract: 014700 Blocks: 1000-1008
 35 Tract: 015100 Blocks: 1000-1019 2000-2002
 36 Tract: 018901 Blocks: 1000-1014 1018-1020 1030-1031 3005-3006
 37 Tract: 019700 Blocks: 1002-1004 1014-1015
 38 Tract: 020100 Blocks: 1000-1012 2000 3000-3007 3014-3015
 39 Tract: 030301 Blocks: 2000-2001 2004 2011
 40 Tract: 030302 Blocks: 3000-3005 3010
 41 62. Assembly District 62.
 42 Within Richmond County
 43 Within Staten Island Borough:
 44 Tract: 014607
 45 Tract: 014608
 46 Tract: 015602
 47 Tract: 017005
 48 Tract: 017007
 49 Tract: 017009
 50 Tract: 017011
 51 Tract: 017012
 52 Tract: 017013
 53 Tract: 017014
 54 Tract: 017015
 55 Tract: 017016
 56 Tract: 017600

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A. 9040--A

1 Tract: 019800
 2 Tract: 020803
 3 Tract: 020804
 4 Tract: 020805
 5 Tract: 020806
 6 Tract: 022601
 7 Tract: 022602
 8 Tract: 022801
 9 Tract: 024401
 10 Tract: 024402
 11 Tract: 024800
 12 Tract: 013201 Blocks: 1000-1001
 13 Tract: 013203 Block: 1000
 14 Tract: 013204 Blocks: 1000 2000 2003-2004 2020-2021 3000-3023
 15 Tract: 013800 Blocks: 1000-1024 2000-2021 3000-3013 4000-4003
 16 4010-4011 5011
 17 Tract: 014604 Blocks: 1000-1014 2000-2003 2009-2011 3000-3014 4005
 18 Tract: 014605 Blocks: 1000-1024 2000-2025
 19 Tract: 014606 Blocks: 1000-1005 2000-2011 3000-3004 4000-4006
 20 Tract: 015601 Blocks: 4004-4007 4012-4013 5008-5014 6006-6010
 21 Tract: 015603 Blocks: 0002-0003 1000-1008 2012-2014
 22 Tract: 022802 Blocks: 1005-1021 1024
 23 Tract: 027900 Blocks: 1001 1006-1008 1010-1014 1017-1023 2002-2003
 24 2005 2007-2012 3000-3001
 25 Tract: 029102 Blocks: 1048 1054-1056 1060 1064-1065 1068-1070
 26 2004-2006 2009-2019
 27 Tract: 990100 Blocks: 0008-0010
 28 63. Assembly District 63.
 29 Within Richmond County
 30 Within Staten Island Borough:
 31 Tract: 003600
 32 Tract: 004001
 33 Tract: 005901
 34 Tract: 005902
 35 Tract: 012100
 36 Tract: 016901
 37 Tract: 018701
 38 Tract: 018703
 39 Tract: 018704
 40 Tract: 018902
 41 Tract: 027301
 42 Tract: 027302
 43 Tract: 027702
 44 Tract: 027704
 45 Tract: 027705
 46 Tract: 027706
 47 Tract: 029104
 48 Tract: 029105
 49 Tract: 029106
 50 Tract: 031901
 51 Tract: 031902
 52 Tract: 032300
 53 Tract: 000600 Blocks: 1000-1006 1007-1011 2000-2002 2006-2007
 54 Tract: 000800 Blocks: 1000-1022 2000-2012 3000-3001 3007
 55 Tract: 002001 Blocks: 1000-1015 2002-2004 2011-2014
 56 Tract: 002002 Block: 2004

S. 8185--A

59

A. 9040--A

1 Tract: 002700 Blocks: 1000-1001 2000 2002-2004
 2 Tract: 002900 Blocks: 3000-3003
 3 Tract: 003300 Block: 2006
 4 Tract: 003900 Blocks: 1001-1002 2000-2009
 5 Tract: 004002 Blocks: 1000-1002
 6 Tract: 004004 Blocks: 1002 1006-1016 2009 2011 2013-2019
 7 Tract: 004700 Blocks: 1003-1015 1018-1025 2000-2008
 8 Tract: 005000 Blocks: 2000-2003 2006-2015 3000 3004-3006
 9 Tract: 006700 Blocks: 2000-2013 3000-3011
 10 Tract: 007500 Blocks: 2002-2005 3005-3009
 11 Tract: 010500 Blocks: 2000-2008 3000-3005 4000-4006
 12 Tract: 014700 Blocks: 1009 2000-2018 3000-3010
 13 Tract: 015100 Blocks: 2003-2009 3000-3007 4000-4009 5000-5009
 14 Tract: 017300 Blocks: 1004-1008 1011-1014 1017 1020 2000
 15 Tract: 018100 Blocks: 1000-1002 2022
 16 Tract: 018901 Blocks: 1015-1017 1021-1029 2000-2019 3000-3004
 17 3007-3019
 18 Tract: 019700 Blocks: 1000-1001 1005-1013 1016-1021 2000-2016
 19 Tract: 020100 Blocks: 2001-2011 3008-3013 3016
 20 Tract: 022802 Blocks: 1000-1005 1013 1022-1023
 21 Tract: 027900 Blocks: 1000 1002-1005 1009 1015-1016 2000-2001
 22 4000-4003
 23 Tract: 029102 Blocks: 0001-0002 1000-1047 1049-1053 1057-1059
 24 1062-1063 1066-1067 2000-2003 2007-2008 2020
 25 Tract: 030301 Blocks: 1000-1014 2002-2003 2005-2010 2012-2018
 26 Tract: 030302 Blocks: 1000-1008 2000-2004 3006-3007 3018-3019
 27 4001-4002
 28 64. Assembly District 64.
 29 Within Kings County
 30 Within Brooklyn Borough:
 31 Tract: 003600
 32 Tract: 003800
 33 Tract: 013000
 34 Within Richmond County
 35 Within Staten Island Borough:
 36 Tract: 001800
 37 Tract: 006400
 38 Tract: 007001
 39 Tract: 007002
 40 Tract: 007400
 41 Tract: 009601
 42 Tract: 009602
 43 Tract: 011201
 44 Tract: 011203
 45 Tract: 011204
 46 Tract: 011401
 47 Tract: 011402
 48 Tract: 012200
 49 Tract: 012804
 50 Tract: 012805
 51 Tract: 012806
 52 Tract: 013400
 53 Tract: 015400
 54 Tract: 017701
 55 Tract: 017702
 56 Tract: 003000 Block: 2001

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A. 9040--A

1 Tract: 003400 Blocks: 1000-1012 2000-2004 3000-3003
 2 Tract: 004400 Blocks: 0001 1000-1013 2000-2004
 3 Tract: 004600 Blocks: 0001 1003-1008 1011-1012
 4 Tract: 005000 Blocks: 0001 1000-1005 2000-2002
 5 Tract: 005201 Blocks: 0001 1001-1004
 6 Tract: 005202 Blocks: 0001 1001-1003 2004-2006
 7 Tract: 005400 Blocks: 0001 1003-1005
 8 Tract: 005601 Blocks: 0001 1003-1005
 9 Tract: 005602 Blocks: 0001-0002 1005-1007
 10 Tract: 006600 Blocks: 1000-1001 3000-3001
 11 Tract: 006800 Blocks: 1001 2000-2002 3000-3001 4000-4002
 12 Tract: 012600 Blocks: 3002-3004
 13 Tract: 016200 Blocks: 2006-2009
 14 Within Richmond County
 15 Within Staten Island Borough:
 16 Tract: 000600 Blocks: 0002 2003-2005
 17 Tract: 000800 Blocks: 3002-3012
 18 Tract: 002001 Blocks: 2000-2001 2005-2010 2015-2018
 19 Tract: 002002 Blocks: 1000-1022 2000-2003 2005-2010
 20 Tract: 005000 Blocks: 1000-1015 2004-2005 3001-3003 3007-3013
 21 Tract: 013201 Blocks: 1002-1009 2000-2017
 22 Tract: 013203 Blocks: 1001-1013 2000-2021 3000-3021
 23 Tract: 013204 Blocks: 1001-1022 2001-2002 2005-2019 2022-2035
 24 Tract: 013800 Blocks: 4004-4009 5000-5010
 25 Tract: 014604 Blocks: 2004-2008 2012-2017 4000-4004 4006-4010
 26 Tract: 014605 Block: 2026
 27 Tract: 014606 Block: 2012
 28 Tract: 015601 Blocks: 1000-1012 2000-2012 3000-3012 4000-4003
 29 4008-4011 5000-5007 6000-6005 6011-6015
 30 Tract: 015603 Blocks: 0001 2000-2011 2015 3000-3015
 31 Tract: 017300 Blocks: 1000-1003 1009-1010 1015-1016 1018-1019
 32 Tract: 018100 Blocks: 2000-2021 2023 3000-3017
 33 Tract: 027900 Blocks: 2004 2006
 34 Tract: 990100 Blocks: 0001-0007
 35 65. Assembly District 65.
 36 Within New York County
 37 Within Manhattan Borough:
 38 Tract: 000201
 39 Tract: 000202
 40 Tract: 000600
 41 Tract: 000800
 42 Tract: 001401
 43 Tract: 001402
 44 Tract: 001600
 45 Tract: 001800
 46 Tract: 002201
 47 Tract: 002202
 48 Tract: 002500
 49 Tract: 002700
 50 Tract: 002901
 51 Tract: 002902
 52 Tract: 003001
 53 Tract: 003601
 54 Tract: 004100
 55 Tract: 000700 Blocks: 1005 2000 3000 4000-4004 5000-5001 6000-6002
 56 7000-7003 7005

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A. 9040--A

1 Tract: 000900 Blocks: 1000-1002
 2 Tract: 001001 Blocks: 1002 1004-1015
 3 Tract: 001002 Blocks: 3000 3003
 4 Tract: 001200 Blocks: 1000-1012 2000-2009 3001-3006
 5 Tract: 001501 Blocks: 0001-0002 1000 1007 1011-1016 2000-2002
 6 3000-3016
 7 Tract: 001502 Blocks: 0001 2000-2007 3000-3003 4000-4006 5000
 8 6000-6001 7000-7002 8000
 9 Tract: 002000 Blocks: 1000 2000 3002
 10 Tract: 002601 Blocks: 1001-1002 2001
 11 Tract: 003002 Blocks: 1000-1002 2001-2003
 12 Tract: 003100 Blocks: 1000-1008 1011-1012 2004-2006
 13 Tract: 003200 Blocks: 5000 6001
 14 Tract: 004300 Blocks: 1000-1002 2000-2001 3006
 15 Tract: 004500 Blocks: 1004-1005 1008-1011
 16 66. Assembly District 66.
 17 Within New York County
 18 Within Manhattan Borough:
 19 Tract: 002100
 20 Tract: 003300
 21 Tract: 003602
 22 Tract: 003700
 23 Tract: 003800
 24 Tract: 003900
 25 Tract: 004001
 26 Tract: 004002
 27 Tract: 004200
 28 Tract: 004700
 29 Tract: 004900
 30 Tract: 005501
 31 Tract: 005502
 32 Tract: 005700
 33 Tract: 005900
 34 Tract: 006100
 35 Tract: 006300
 36 Tract: 006500
 37 Tract: 006700
 38 Tract: 006900
 39 Tract: 007100
 40 Tract: 007300
 41 Tract: 007500
 42 Tract: 007700
 43 Tract: 007900
 44 Tract: 001300 Block: 5002
 45 Tract: 001501 Blocks: 1001-1006 1008
 46 Tract: 003100 Blocks: 1009-1010 2000-2003 2007-2010
 47 Tract: 004300 Blocks: 1003-1004 3000-3005
 48 Tract: 004500 Blocks: 1000-1003 1006-1007
 49 Tract: 005200 Blocks: 1004 2005-2006
 50 Tract: 005400 Blocks: 2000 3000
 51 Tract: 008100 Blocks: 3000 4000 5000 6000
 52 Tract: 008300 Blocks: 2000-2002 3002-3003
 53 Tract: 009901 Blocks: 2012-2014
 54 67. Assembly District 67.
 55 Within New York County
 56 Within Manhattan borough:

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A. 9040--A

1 Tract: 012902
 2 Tract: 013501
 3 Tract: 013502
 4 Tract: 014700
 5 Tract: 015101
 6 Tract: 015102
 7 Tract: 015302
 8 Tract: 015501
 9 Tract: 015502
 10 Tract: 015700
 11 Tract: 015900
 12 Tract: 016100
 13 Tract: 016300
 14 Tract: 011700 Blocks: 2000
 15 Tract: 012901 Blocks: 1001 2000-2003 2005-2007 3000-3001 4000-4002
 16 Tract: 013100 Blocks: 1001-1002
 17 Tract: 013300 Blocks: 2000 3000 4000-4001 5001
 18 Tract: 013900 Blocks: 1000 2000 3000-3001
 19 Tract: 014300 Blocks: 1017-1018 1020-1021 1023
 20 Tract: 014500 Blocks: 1000-1002 2000
 21 Tract: 014900 Blocks: 1000-1003 4001
 22 Tract: 016500 Blocks: 1001 2000 3000
 23 Tract: 016700 Blocks: 0001 1000-1004 2000-2001 3000-3003 5000-5001
 24 Tract: 017100 Blocks: 0001 1000-1001 2000 2002 3000-3002 4000
 25 5000-5001 6000-6003
 26 Tract: 017500 Blocks: 1000 1004 2000 3000 4000-4001 5000-5001 6000
 27 6001 7000-7001
 28 Tract: 017900 Blocks: 4001 5000-5002 6001 7000-7002
 29 68. Assembly District 68.
 30 Within New York County
 31 Within Manhattan borough:
 32 Tract: 015601
 33 Tract: 015602
 34 Tract: 015802
 35 Tract: 016002
 36 Tract: 016200
 37 Tract: 016400
 38 Tract: 016600
 39 Tract: 016800
 40 Tract: 017000
 41 Tract: 017200
 42 Tract: 017401
 43 Tract: 017402
 44 Tract: 017800
 45 Tract: 018000
 46 Tract: 018200
 47 Tract: 018400
 48 Tract: 018800
 49 Tract: 019200
 50 Tract: 019400
 51 Tract: 019600
 52 Tract: 019800
 53 Tract: 024000
 54 Tract: 024200
 55 Tract: 014300 Blocks: 1000-1003 1008 1009
 56 Tract: 015200 Blocks: 1000 2000

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A. 9040--A

1 Tract: 015402 Blocks: 2000 3000
2 Tract: 015403 Blocks: 1000 3000
3 Tract: 015801 Blocks: 1000-1002 4000 4001
4 Tract: 016001 Blocks: 1000-1001 2000 3000 4000-4001
5 Tract: 018600 Blocks: 2000-2002
6 Tract: 020000 Blocks: 1000 2002-2004
7 Tract: 020600 Blocks: 2000-2006
8 Tract: 021600 Blocks: 1002 1003
9 69. Assembly District 69.
10 Within New York County
11 Within Manhattan borough:
12 Tract: 016900
13 Tract: 017300
14 Tract: 017700
15 Tract: 018100
16 Tract: 018300
17 Tract: 018500
18 Tract: 018700
19 Tract: 018900
20 Tract: 019100
21 Tract: 019300
22 Tract: 019500
23 Tract: 019900
24 Tract: 020101
25 Tract: 020300
26 Tract: 020500
27 Tract: 020701
28 Tract: 014300 Blocks: 1004-1007 1010-1016
29 Tract: 016500 Blocks: 1000 4000 5000
30 Tract: 016700 Blocks: 4000-4001
31 Tract: 017100 Block: 2001
32 Tract: 017500 Blocks: 0001 1001-1003
33 Tract: 017900 Blocks: 0001 1000-1004 2000 3000-3001 4000 6000
34 Tract: 019701 Blocks: 1001-1002
35 Tract: 019702 Block: 1004
36 Tract: 020901 Block: 2000
37 Tract: 021100 Blocks: 3001 4001 5000-5001 6000-6001 7000-7001
38 Tract: 021600 Block: 5002
39 70. Assembly District 70.
40 Within New York County
41 Within Manhattan borough:
42 Tract: 019000
43 Tract: 020102
44 Tract: 020800
45 Tract: 021000
46 Tract: 021200
47 Tract: 021303
48 Tract: 021400
49 Tract: 021500
50 Tract: 021703
51 Tract: 021800
52 Tract: 022000
53 Tract: 022102
54 Tract: 022200
55 Tract: 022400
56 Tract: 022600

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A. 9040--A

1 Tract: 022800
 2 Tract: 023000
 3 Tract: 025700
 4 Tract: 018600 Blocks: 1000-1001 3000-3001
 5 Tract: 019701 Block: 1000
 6 Tract: 019702 Blocks: 1000-1003
 7 Tract: 020000 Blocks: 1001-1002 2000-2001
 8 Tract: 020600 Blocks: 1000-1005
 9 Tract: 020901 Blocks: 1000-1004 2001
 10 Tract: 021100 Blocks: 0001 1000-1007 2000 3000 4000
 11 Tract: 021600 Blocks: 1000-1001 1004 2000 3000-3001 4000-4001
 12 5000-5001
 13 Tract: 021900 Blocks: 1000-1001 1005-1007 1011-1017 2000-2002
 14 3000-3001 4000-4002
 15 Tract: 022301 Blocks: 1000 2000-2002 3000 3005 4000
 16 Tract: 022302 Blocks: 1000 2000
 17 Tract: 022500 Blocks: 2000-2001 3001-3003 4001 5000-5001
 18 Tract: 022700 Blocks: 1004 2000-2001 3001
 19 Tract: 023200 Blocks: 3000-3001
 20 Tract: 025900 Blocks: 2001-2003
 21 71. Assembly District 71.
 22 Within New York County
 23 Within Manhattan borough:
 24 Tract: 022900
 25 Tract: 023100
 26 Tract: 023300
 27 Tract: 023400
 28 Tract: 023501
 29 Tract: 023502
 30 Tract: 023600
 31 Tract: 023700
 32 Tract: 023900
 33 Tract: 024100
 34 Tract: 024302
 35 Tract: 024700
 36 Tract: 025500
 37 Tract: 026500
 38 Tract: 027300
 39 Tract: 027500
 40 Tract: 028100
 41 Tract: 021900 Blocks: 0001 1002-1004 1008-1010
 42 Tract: 022301 Blocks: 0001 3001-3004
 43 Tract: 022302 Blocks: 0001 1001-1003
 44 Tract: 022500 Blocks: 0001 1000-1006 3000 4000
 45 Tract: 022700 Blocks: 1000-1003 3000 3002
 46 Tract: 023200 Blocks: 1000-1001 2000-2001 4000-4001
 47 Tract: 024500 Blocks: 2000-2001 3000-3001 5002-5003 7000
 48 Tract: 025100 Blocks: 1001-1002
 49 Tract: 025300 Blocks: 5000-5001 6000-6001
 50 Tract: 025900 Blocks: 1000-1004 2000
 51 Tract: 026300 Blocks: 4001-4002 4005-4006 5002
 52 Tract: 027100 Blocks: 5000-5001
 53 Tract: 028700 Blocks: 0001 1000-1010
 54 Tract: 029500 Blocks: 1000-1001 2000-2001 4000
 55 Tract: 029700 Blocks: 0001-0003 1003-1006
 56 72. Assembly District 72.

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A. 9040--A

1 Within New York County
 2 Within Manhattan borough:
 3 Tract: 024301
 4 Tract: 024900
 5 Tract: 026100
 6 Tract: 026700
 7 Tract: 026900
 8 Tract: 027700
 9 Tract: 027900
 10 Tract: 028300
 11 Tract: 028500
 12 Tract: 029100
 13 Tract: 029300
 14 Tract: 029900
 15 Tract: 030300
 16 Tract: 030700
 17 Tract: 030900
 18 Tract: 031100
 19 Tract: 024500 Blocks: 1000-1001 4000-4002 5000-5001 6000-6001
 20 Tract: 025100 Blocks: 1000 1003-1008 2000-2003
 21 Tract: 025300 Blocks: 1000-1001 2000-2001 3000-3001 4000-4005
 22 Tract: 026300 Blocks: 1000-1011 2000-2001 3000-3003 4000 4003-4004
 23 5000-5001
 24 Tract: 027100 Blocks: 1000-1002 2000-2003 3000-3005 4000-4002
 25 Tract: 028700 Blocks: 2000-2001 3000-3001
 26 Tract: 029500 Blocks: 3000-3001 4001-4002
 27 Tract: 029700 Blocks: 0004 1000-1002
 28 73. Assembly District 73.
 29 Within New York County
 30 Within Manhattan borough:
 31 Tract: 008000
 32 Tract: 008200
 33 Tract: 009200
 34 Tract: 009400
 35 Tract: 009800
 36 Tract: 010000
 37 Tract: 010200
 38 Tract: 010801
 39 Tract: 010802
 40 Tract: 010803
 41 Tract: 011202
 42 Tract: 011203
 43 Tract: 011401
 44 Tract: 011402
 45 Tract: 012000
 46 Tract: 012200
 47 Tract: 012800
 48 Tract: 013000
 49 Tract: 014000
 50 Tract: 014200
 51 Tract: 014801
 52 Tract: 014802
 53 Tract: 015001
 54 Tract: 015002
 55 Tract: 007002 Blocks: 1000 4000
 56 Tract: 007200 Blocks: 1000 2000-2001 5000 6000 7000

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A. 9040--A

1 Tract: 007400 Blocks: 1000-1001 4000 5000-5002
 2 Tract: 007800 Blocks: 1000-1001 2000-2003 3000 4000-4002
 3 Tract: 008602 Blocks: 1000 1005
 4 Tract: 008603 Blocks: 1000-1001 2000-2002 3000 4000-4009
 5 Tract: 008800 Blocks: 1000-1004 2000-2001
 6 Tract: 009000 Blocks: 3000 4000 5000-5001 6000 7000-7001
 7 Tract: 010601 Blocks: 1000 2000 3000 4000 5000 6000-6004
 8 Tract: 010602 Blocks: 2008-2011 3001-3005
 9 Tract: 011000 Blocks: 1000 2000 3000-3002 6002-6003
 10 Tract: 011800 Blocks: 7000 8000
 11 Tract: 014602 Block: 4000
 12 Tract: 015401 Blocks: 1000 3000
 13 Tract: 015403 Blocks: 2000 4000
 14 Tract: 015801 Blocks: 2000-2001 3000-3002
 15 Tract: 016001 Blocks: 2001-2002 3001-3002
 16 74. Assembly District 74.
 17 Within New York County
 18 Within Manhattan borough:
 19 Tract: 002400
 20 Tract: 002602
 21 Tract: 002800
 22 Tract: 003400
 23 Tract: 004400
 24 Tract: 004800
 25 Tract: 005000
 26 Tract: 006000
 27 Tract: 006200
 28 Tract: 006400
 29 Tract: 006600
 30 Tract: 006800
 31 Tract: 007001
 32 Tract: 001001 Blocks: 0001-0003 1000-1001 1003
 33 Tract: 001002 Blocks: 0001-0002 1000-1001 2000-2001 3001-3002 4000
 34 5000
 35 Tract: 001200 Block: 3000
 36 Tract: 002000 Blocks: 0001 1001-1003 3000-3001
 37 Tract: 002601 Blocks: 1000 2000
 38 Tract: 003002 Block: 2000
 39 Tract: 003200 Blocks: 1000-1001 2000 3000-3001 4000 6000 7000-7002
 40 Tract: 005200 Blocks: 1000-1003 1005 2000-2004
 41 Tract: 005600 Blocks: 1000 1003-1006 2000-2003 3000-3001
 42 Tract: 007002 Blocks: 2000 3000-3001
 43 Tract: 007200 Blocks: 2002 3000-3002 4000-4002 5001
 44 Tract: 007400 Blocks: 1002 2000-2002
 45 Tract: 007800 Blocks: 5000-5003 6000-6002 7000-7001
 46 Tract: 008601 Blocks: 0004 1000-1003 3000-3015
 47 Tract: 008602 Blocks: 1001-1004 1006-1008
 48 Tract: 008800 Blocks: 1005-1006 3000-3001 4000-4001 5000 6000-6001
 49 7000
 50 Tract: 009000 Blocks: 1000 2000 3001
 51 75. Assembly District 75.
 52 Within New York County
 53 Within Manhattan borough:
 54 Tract: 005800
 55 Tract: 007600
 56 Tract: 008400

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A. 9040--A

1 Tract: 008700
2 Tract: 008900
3 Tract: 009100
4 Tract: 009300
5 Tract: 009500
6 Tract: 009600
7 Tract: 009700
8 Tract: 009902
9 Tract: 009903
10 Tract: 010100
11 Tract: 010300
12 Tract: 010400
13 Tract: 010900
14 Tract: 011100
15 Tract: 011201
16 Tract: 011300
17 Tract: 011500
18 Tract: 011900
19 Tract: 012101
20 Tract: 012102
21 Tract: 012500
22 Tract: 012700
23 Tract: 013700
24 Tract: 015301
25 Tract: 005400 Blocks: 1000-1005
26 Tract: 005600 Blocks: 1001-1002
27 Tract: 007400 Blocks: 3000-3002 5003
28 Tract: 008100 Blocks: 1000-1001 2000-2001
29 Tract: 008300 Blocks: 1000-1001 3000-3001
30 Tract: 009901 Blocks: 0001 1000-1008 2000-2011
31 Tract: 011700 Blocks: 0001-0003 1000-1008 3000-3012
32 Tract: 012901 Blocks: 0001-0002 1000 2004
33 Tract: 013100 Blocks: 1000 1003-1005 2000-2003 3000-3001
34 Tract: 013300 Blocks: 1000 2001 3001 5000
35 Tract: 013900 Blocks: 4000-4002 5000 6000 7000
36 Tract: 014300 Blocks: 1019 1022 1024-1033
37 Tract: 014500 Blocks: 3000-3002 4000-4002 5000-5001
38 Tract: 014900 Blocks: 1004 2000 3000 4000 5000
39 76. Assembly District 76.
40 Within New York County
41 Within Manhattan borough:
42 Tract: 011600
43 Tract: 012400
44 Tract: 012601
45 Tract: 012602
46 Tract: 013201
47 Tract: 013202
48 Tract: 013203
49 Tract: 013400
50 Tract: 013601
51 Tract: 013602
52 Tract: 013603
53 Tract: 013604
54 Tract: 013800
55 Tract: 014401
56 Tract: 014402

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A. 9040--A

1 Tract: 014601
 2 Tract: 023802
 3 Tract: 023803
 4 Tract: 023804
 5 Tract: 008601 Blocks: 0001-0003 2000
 6 Tract: 008602 Block: 0001
 7 Tract: 008603 Block: 0001
 8 Tract: 010601 Block: 0001
 9 Tract: 010602 Blocks: 0001-0002 1000 2000-2007 3000 4000
 10 Tract: 011000 Blocks: 4000 5000-5001 6000-6001
 11 Tract: 011800 Blocks: 1000 2000-2001 3000 4000-4002 5000 6000
 12 Tract: 014602 Blocks: 1000 2000-2001 3000 5000 6000-6001
 13 Tract: 015200 Blocks: 0001 3000 4000 5000 6000-6005 7000
 14 Tract: 015401 Blocks: 2000 4000
 15 Tract: 015402 Block: 1000
 16 77. Assembly District 77.
 17 Within Bronx County
 18 Within Bronx Borough:
 19 Tract: 005300
 20 Tract: 017500
 21 Tract: 017701
 22 Tract: 017901
 23 Tract: 017902
 24 Tract: 018101
 25 Tract: 018102
 26 Tract: 018301
 27 Tract: 019300
 28 Tract: 020100
 29 Tract: 020900
 30 Tract: 021100
 31 Tract: 021301
 32 Tract: 021302
 33 Tract: 021700
 34 Tract: 022702
 35 Tract: 005902 Blocks: 1000-1002
 36 Tract: 006301 Blocks: 3002 4003-4004 6000-6004 6007 6010-6013
 37 Tract: 014300 Blocks: 1002-1003 1009
 38 Tract: 014500 Block: 4003
 39 Tract: 017100 Block: 1000
 40 Tract: 017300 Blocks: 1000-1004 2000-2001
 41 Tract: 017702 Blocks: 1000 2001 3000-3001 4000
 42 Tract: 018302 Blocks: 1000 2000-2001 3000-3002
 43 Tract: 018900 Blocks: 1000-1005 1008 2000 3000-3004 4000-4003
 44 Tract: 019500 Blocks: 2000 2010 4000-4003
 45 Tract: 019700 Blocks: 1000 4000 5000-5001
 46 Tract: 019900 Blocks: 3000-3001 4000-4003 5000 6000-6001
 47 Tract: 020501 Blocks: 1000-1011 2000-2004 3000 4001 5000-5002
 48 Tract: 020502 Blocks: 2000 3000-3001
 49 Tract: 021502 Blocks: 1000-1002 2000-2001 3000-3002 5000
 50 Tract: 021900 Block: 1007
 51 Tract: 022102 Blocks: 1000 1003 2000 3000 3003
 52 Tract: 022300 Blocks: 1000-1001 2000-2001 4000 4003
 53 Tract: 022500 Blocks: 1001 2001-2004 3000-3002 4000-4003 5000-5001
 54 6001-6002
 55 Tract: 022701 Blocks: 1000-1001 2002 3001-3007
 56 Tract: 022703 Blocks: 1002-1003

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A. 9040--A

1 Tract: 023301 Blocks: 1000-1001 2002 3000-3001 4000-4001
 2 Tract: 024100 Blocks: 1000-1002 2001 3001
 3 Tract: 024700 Blocks: 1001 2000-2004
 4 Tract: 025700 Blocks: 1006-1008
 5 78. Assembly District 78.
 6 Within Bronx County
 7 Within Bronx Borough:
 8 Tract: 026100
 9 Tract: 026300
 10 Tract: 026500
 11 Tract: 026701
 12 Tract: 038700
 13 Tract: 038900
 14 Tract: 039100
 15 Tract: 039300
 16 Tract: 039901
 17 Tract: 040302
 18 Tract: 040303
 19 Tract: 040304
 20 Tract: 040501
 21 Tract: 040502
 22 Tract: 040701
 23 Tract: 040702
 24 Tract: 041500
 25 Tract: 023702 Blocks: 1000
 26 Tract: 026702 Blocks: 2000 4000 5000 6001
 27 Tract: 026900 Blocks: 2000-2002
 28 Tract: 027300 Blocks: 1003 3000-3001 4001
 29 Tract: 033000 Block: 3001
 30 Tract: 033201 Blocks: 1001-1004 2000 3000-3001
 31 Tract: 033400 Blocks: 1009-1111 1013-1014 1016-1025 1032
 32 Tract: 036501 Blocks: 1000-1001
 33 Tract: 037100 Blocks: 1000-1004 4000-4001
 34 Tract: 037300 Blocks: 1001-1002 2000 2003
 35 Tract: 037504 Blocks: 1000 1004
 36 Tract: 038304 Blocks: 1000-1001
 37 Tract: 038500 Blocks: 1000-1002 1004-1009 2001-2002 3000-3006 4005
 38 Tract: 039700 Blocks: 1000 1002-1016 2000-2002
 39 Tract: 039902 Blocks: 1000-1002 4000
 40 Tract: 040100 Blocks: 1000-1001 2000-2001 2003-2004 5000-5001
 41 Tract: 040900 Blocks: 1002-1003 1005-1006
 42 Tract: 041100 Blocks: 1003-1004 2000-2003 3000-3002
 43 Tract: 041300 Blocks: 1000-1005 2000-2001 3000-3002 4002-4004 5000
 44 6000-6001 7000-7003
 45 Tract: 042500 Blocks: 3006-3007
 46 79. Assembly District 79.
 47 Within Bronx County
 48 Within Bronx Borough:
 49 Tract: 006900
 50 Tract: 013300
 51 Tract: 013500
 52 Tract: 014100
 53 Tract: 014701
 54 Tract: 014702
 55 Tract: 014900
 56 Tract: 015100

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A. 9040--A

1 Tract: 015300
 2 Tract: 015500
 3 Tract: 016300
 4 Tract: 016700
 5 Tract: 016900
 6 Tract: 018501
 7 Tract: 018502
 8 Tract: 036502
 9 Tract: 036700
 10 Tract: 036901
 11 Tract: 036902
 12 Tract: 006100 Blocks: 1000 2000-2001 3000 4000
 13 Tract: 006500 Block: 2000
 14 Tract: 006700 Blocks: 1000-1003 3000-3001 4000-4002 6000-6002
 15 Tract: 007100 Blocks: 1000-1008 2000-2006
 16 Tract: 007500 Blocks: 1000-1001 2002-2004
 17 Tract: 007700 Blocks: 1000-1001 1006-1009
 18 Tract: 007900 Blocks: 1000-1001
 19 Tract: 012300 Blocks: 1000-1002 2002-2003
 20 Tract: 012500 Blocks: 2001-2004
 21 Tract: 012901 Block: 2000
 22 Tract: 013100 Blocks: 1000-1001 1003-1004 2000-2003 3000-3004 4001
 23 Tract: 014300 Blocks: 1000-1001 1004-1008 1010
 24 Tract: 014500 Blocks: 1000-1001 2000 3000-3001 4000-4002
 25 Tract: 015700 Blocks: 2002-2004 4000-4003
 26 Tract: 016100 Blocks: 1001 1004-1009 2001-2002 3000 4000-4001
 27 Tract: 016500 Blocks: 1006 1009-1023
 28 Tract: 017300 Blocks: 3000-3002 4000-4002
 29 Tract: 017702 Block: 2000
 30 Tract: 018302 Blocks: 1001 2002-2003
 31 Tract: 035900 Blocks: 1000 1002 1010-1013
 32 Tract: 036300 Blocks: 4000 4008
 33 Tract: 036501 Blocks: 2000-2003 3000-3002
 34 Tract: 037100 Blocks: 2000-2006 3000-3003
 35 Tract: 037300 Blocks: 2001-2002 2004 3000-3003
 36 80. Assembly District 80.
 37 Within Bronx County
 38 Within Bronx Borough:
 39 Tract: 022401
 40 Tract: 022403
 41 Tract: 022404
 42 Tract: 022800
 43 Tract: 023000
 44 Tract: 023200
 45 Tract: 023600
 46 Tract: 023800
 47 Tract: 024600
 48 Tract: 024800
 49 Tract: 025000
 50 Tract: 028800
 51 Tract: 031200
 52 Tract: 031400
 53 Tract: 031600
 54 Tract: 031800
 55 Tract: 032400
 56 Tract: 032600

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A. 9040--A

1 Tract: 032800
 2 Tract: 033202
 3 Tract: 033601
 4 Tract: 033602
 5 Tract: 033801
 6 Tract: 033802
 7 Tract: 037600
 8 Tract: 042901
 9 Tract: 022000 Block: 1002
 10 Tract: 024000 Blocks: 1000-1007 2000-2001 3000-3002
 11 Tract: 024400 Blocks: 1000-1003 2000-2002 2006
 12 Tract: 025200 Blocks: 1000-1003
 13 Tract: 025400 Blocks: 1003-1004
 14 Tract: 029600 Blocks: 1000-1013 1016 1022-1023 2000-2002
 15 Tract: 031000 Blocks: 1000-1011 2000-2004 2007-2014 3000-3009
 16 Tract: 033000 Blocks: 1000-1003 2000-2001 3000 3002 4000-4004
 17 Tract: 033201 Block: 1000
 18 Tract: 033400 Blocks: 1000-1008 1012 1015
 19 Tract: 034000 Blocks: 1002 2000-2006 3000 4000-4003
 20 Tract: 034200 Blocks: 2000-2010
 21 Tract: 034400 Blocks: 1000-1002 2005 2007
 22 Tract: 034800 Blocks: 4000-4005
 23 Tract: 035000 Blocks: 1003-1007 2002-2005
 24 Tract: 036000 Blocks: 1004 2000-2003 3002-3008
 25 Tract: 037200 Blocks: 2006 2008-2009
 26 Tract: 037400 Blocks: 1000-1001 2001 2007
 27 Tract: 039700 Block: 1001
 28 Tract: 040900 Block: 1004
 29 Tract: 041100 Blocks: 1000-1002
 30 Tract: 041300 Blocks: 4000-4001
 31 Tract: 041900 Blocks: 1003-1004 2000 3000-3001 4000-4009 5000 6000
 32 7001
 33 Tract: 042100 Blocks: 2000 3000-3001 4000 5000-5001 5004-5005
 34 Tract: 042300 Blocks: 3000-3001
 35 Tract: 042500 Blocks: 1000 2000 3000-3005 4000 5000-5001 6000-6001
 36 7000-7001
 37 Tract: 042902 Blocks: 1000-1002 2000
 38 Tract: 043102 Blocks: 3000-3001
 39 81. Assembly District 81.
 40 Within Bronx County
 41 Within Bronx Borough:
 42 Tract: 027700
 43 Tract: 027900
 44 Tract: 028100
 45 Tract: 028300
 46 Tract: 028500
 47 Tract: 028700
 48 Tract: 028900
 49 Tract: 029301
 50 Tract: 029302
 51 Tract: 029500
 52 Tract: 029700
 53 Tract: 030100
 54 Tract: 030701
 55 Tract: 030900
 56 Tract: 031900

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S. 8185--A

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A. 9040--A

1 Tract: 032300
2 Tract: 033500
3 Tract: 033700
4 Tract: 034300
5 Tract: 034500
6 Tract: 035100
7 Tract: 041400
8 Tract: 041800
9 Tract: 043101
10 Tract: 043501
11 Tract: 043502
12 Tract: 043503
13 Tract: 044901
14 Tract: 044902
15 Tract: 045101
16 Tract: 045102
17 Tract: 026702 Blocks: 1000-1002 3000 6000
18 Tract: 027300 Blocks: 1000-1002 1004 2000-2003 4000
19 Tract: 040900 Blocks: 1001 1007 2000-2002
20 Tract: 041900 Blocks: 1000-1002 7000
21 Tract: 042000 Blocks: 1000-1002 2000-2001 3000
22 Tract: 042100 Blocks: 1000-1002 5002-5003
23 Tract: 042300 Blocks: 1000-1001 2000-2003
24 Tract: 042902 Block: 3000
25 Tract: 043102 Blocks: 1000-1002 2000-2001 3002-3003
26 Tract: 043400 Blocks: 1000-1006 2000-2002 3000-3002 4000 4002-4004
27 Tract: 044200 Blocks: 1000-1001 2001-2002 5001-5004
28 82. Assembly District 82.
29 Within Bronx County
30 Within Bronx Borough:
31 Tract: 011000
32 Tract: 011800
33 Tract: 013000
34 Tract: 013200
35 Tract: 013800
36 Tract: 014400
37 Tract: 015200
38 Tract: 015800
39 Tract: 016000
40 Tract: 016200
41 Tract: 016400
42 Tract: 016600
43 Tract: 018400
44 Tract: 019400
45 Tract: 025600
46 Tract: 026400
47 Tract: 026601
48 Tract: 026602
49 Tract: 027401
50 Tract: 027402
51 Tract: 027600
52 Tract: 028400
53 Tract: 028600
54 Tract: 030000
55 Tract: 030201
56 Tract: 030202

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1 Tract: 046204
2 Tract: 046205
3 Tract: 046206
4 Tract: 046207
5 Tract: 050400
6 Tract: 051601
7 Tract: 051602
8 Tract: 009000 Blocks: 0001 2000-2020
9 Tract: 009600 Blocks: 2000-2001
10 Tract: 020000 Blocks: 1002-1004 2000-2001 3000-3003 4000-4018
11 Tract: 024400 Blocks: 2003-2005
12 Tract: 025200 Blocks: 1004-1007 2000-2007
13 Tract: 025400 Blocks: 1000-1002 1005 2000-2003
14 Tract: 029600 Blocks: 1014-1015 1017-1021
15 Tract: 031000 Blocks: 2005-2006
16 Tract: 35600 Blocks: 2009-2011
17 Tract: 45600 Blocks: 3000-3019 3021 3024-3025
18 Tract: 046203 Blocks: 1000 2000-2001 3000-3011 3014-3017
19 Tract: 046208 Block: 2008
20 83. Assembly District 83.
21 Within Bronx County
22 Within Bronx Borough:
23 Tract: 035800
24 Tract: 036400
25 Tract: 036800
26 Tract: 037000
27 Tract: 037800
28 Tract: 038000
29 Tract: 038200
30 Tract: 038600
31 Tract: 038800
32 Tract: 039000
33 Tract: 039200
34 Tract: 039400
35 Tract: 039600
36 Tract: 039800
37 Tract: 040400
38 Tract: 040600
39 Tract: 040800
40 Tract: 042200
41 Tract: 042400
42 Tract: 042600
43 Tract: 042800
44 Tract: 043000
45 Tract: 043600
46 Tract: 044400
47 Tract: 044800
48 Tract: 045800
49 Tract: 046000
50 Tract: 046209
51 Tract: 048401
52 Tract: 048402
53 Tract: 034000 Blocks: 1000-1001 1003
54 Tract: 034200 Blocks: 1000-1002
55 Tract: 034400 Blocks: 2000-2004 2006 2008
56 Tract: 034800 Blocks: 1000-1011 2000 3000-3006

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1 Tract: 035000 Blocks: 1000-1002 2000-2001
 2 Tract: 035600 Blocks: 1000-1005 2000-2008
 3 Tract: 036000 Blocks: 1000-1003 3000-3001
 4 Tract: 037200 Blocks: 1000-1005 2000-2005 2007
 5 Tract: 037400 Blocks: 2000 2002-2006 3000 4000
 6 Tract: 042000 Blocks: 3001-3002
 7 Tract: 043400 Blocks: 4001 4005-4006
 8 Tract: 044200 Blocks: 2000 2003 3000-3007 4000-4004 5000 5005-5006
 9 Tract: 045600 Blocks: 1000-1005 2000-2007 3020 3022-3023
 10 Tract: 046203 Blocks: 3012-3013
 11 Tract: 046208 Blocks: 1000-1006 2000-2007 3000-3006 4000- 4004
 12 84. Assembly District 84.
 13 Within Bronx County
 14 Within Bronx Borough:
 15 Tract: 001901
 16 Tract: 001902
 17 Tract: 001903
 18 Tract: 002300
 19 Tract: 002500
 20 Tract: 002701
 21 Tract: 002702
 22 Tract: 003100
 23 Tract: 003300
 24 Tract: 003500
 25 Tract: 003700
 26 Tract: 003900
 27 Tract: 004100
 28 Tract: 004300
 29 Tract: 005100
 30 Tract: 006302
 31 Tract: 007300
 32 Tract: 008300
 33 Tract: 011701
 34 Tract: 022101
 35 Tract: 001904 Blocks: 0003
 36 Tract: 005902 Blocks: 2000-2001
 37 Tract: 006100 Blocks: 4001-4004
 38 Tract: 006301 Blocks: 1000-1005 2000-2001 3000-3001 4000-4002
 39 5000-5014 6005-6006 6008-6009 6014-6016
 40 Tract: 006500 Blocks: 1000-1005 2001-2002 3000 4000-4005
 41 Tract: 006700 Blocks: 1004-1005 2000-2002 5000
 42 Tract: 007100 Blocks: 2007-2014
 43 Tract: 007500 Blocks: 2000-2001 2005-2008 3000 4000-4001
 44 Tract: 007700 Blocks: 1002-1005 1010-1012
 45 Tract: 007900 Blocks: 1002- 1003 2000-2001 3000-3002 4000-4004 5000
 46 6000
 47 Tract: 008500 Blocks: 2000-2004 3000-3003
 48 Tract: 009301 Blocks: 1000-1003 2000-2002 3000-3003 5006-5008
 49 5010-5013 6000-6008
 50 Tract: 009302 Blocks: 0001 1000-1027 2003-2010 2014-2031
 51 Tract: 011702 Blocks: 1000-1022
 52 Tract: 018900 Blocks: 1006-1007 1009-1012 2001
 53 Tract: 019500 Blocks: 1000-1002 2001-2009 3000
 54 Tract: 019700 Blocks: 1001-1003 2000-2002 3000-3002 4001-4002
 55 Tract: 019900 Blocks: 1000 2000
 56 Tract: 021900 Blocks: 1000-1006 1008-1010

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1 Tract: 022102 Blocks: 1001-1002 2001 3001-3002
 2 Tract: 022300 Blocks: 3000-3001 4001-4002
 3 85. Assembly District 85.
 4 Within Bronx County
 5 Within Bronx Borough:
 6 Tract: 000100
 7 Tract: 000200
 8 Tract: 000400
 9 Tract: 002001
 10 Tract: 002002
 11 Tract: 002400
 12 Tract: 002800
 13 Tract: 004200
 14 Tract: 004600
 15 Tract: 004800
 16 Tract: 005001
 17 Tract: 005002
 18 Tract: 005200
 19 Tract: 005400
 20 Tract: 005600
 21 Tract: 006200
 22 Tract: 006400
 23 Tract: 008400
 24 Tract: 008700
 25 Tract: 008900
 26 Tract: 011502
 27 Tract: 011900
 28 Tract: 012101
 29 Tract: 012102
 30 Tract: 012701
 31 Tract: 015900
 32 Tract: 001600 Blocks: 2001-2005 4009-4010
 33 Tract: 001904 Blocks: 0001-0002 1000 2000
 34 Tract: 003800 Blocks: 1001-1004
 35 Tract: 004400 Blocks: 1000-1001 2000 3001-3002 4000-4002
 36 Tract: 006000 Blocks: 2006-2009 2013
 37 Tract: 006800 Blocks: 1001-1002 2000-2003 3000-3002
 38 Tract: 007600 Blocks: 1001 2001 3001
 39 Tract: 008500 Blocks: 1000-1002 2005 4000 5000
 40 Tract: 009000 Blocks: 0002 1009-1010
 41 Tract: 009301 Blocks: 4000-4012 5000-5005 5009
 42 Tract: 009302 Blocks: 0002 2000-2002 2011-2013
 43 Tract: 009800 Blocks: 5003 5004
 44 Tract: 011702 Blocks: 0001-0003
 45 Tract: 012300 Blocks: 2000-2001 3000-3001 4000 5000-5004 6000-6005
 46 Tract: 012500 Blocks: 1000-1007 2000 2005
 47 Tract: 012901 Blocks: 1000-1007 2001-2003
 48 Tract: 013100 Blocks: 1002 4000
 49 Tract: 015700 Blocks: 1000-1002 2000-2001 3000-3005
 50 Tract: 016100 Blocks: 1000 1002-1003 1010 2000
 51 Tract: 021800 Blocks: 5009
 52 Tract: 035900 Blocks: 1016-1017
 53 86. Assembly District 86.
 54 Within Bronx County
 55 Within Bronx Borough:
 56 Tract: 021501

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1 Tract: 022901
 2 Tract: 022902
 3 Tract: 023100
 4 Tract: 023302
 5 Tract: 023501
 6 Tract: 023502
 7 Tract: 023703
 8 Tract: 023704
 9 Tract: 023900
 10 Tract: 024300
 11 Tract: 024501
 12 Tract: 024502
 13 Tract: 024900
 14 Tract: 025100
 15 Tract: 025300
 16 Tract: 025500
 17 Tract: 037900
 18 Tract: 038100
 19 Tract: 038301
 20 Tract: 038303
 21 Tract: 039500
 22 Tract: 016500 Blocks: 1000-1005 1007-1008
 23 Tract: 017100 Block: 1001
 24 Tract: 020501 Blocks: 4000 4002
 25 Tract: 020502 Blocks: 1000-1001
 26 Tract: 021502 Block: 4000
 27 Tract: 022500 Blocks: 1000 2000 6000
 28 Tract: 022701 Blocks: 2000-2001 2003-2004 3000 3008
 29 Tract: 022703 Blocks: 1000-1001 1004-1006
 30 Tract: 023301 Blocks: 1002 2000-2001 2003
 31 Tract: 023702 Blocks: 1001-1006
 32 Tract: 024100 Blocks: 2000 3000 4000 5000
 33 Tract: 024700 Block: 1000
 34 Tract: 025700 Block: 1000-1005
 35 Tract: 026900 Blocks: 1000-1009 3000
 36 Tract: 037300 Blocks: 1000 4000-4001
 37 Tract: 037504 Blocks: 1001-1003 1005-1008 2000-2003 3000-3005
 38 Tract: 038304 Blocks: 1002-1005
 39 Tract: 038500 Blocks: 1003 2000 4000-4004 4006
 40 Tract: 039902 Blocks: 2000 3000-3002 5000-5001
 41 Tract: 040100 Blocks: 2002 3000-3001 4000
 42 87. Assembly District 87.
 43 Within Bronx County
 44 Within Bronx Borough:
 45 Tract: 004001
 46 Tract: 007000
 47 Tract: 007200
 48 Tract: 007400
 49 Tract: 007800
 50 Tract: 008600
 51 Tract: 009200
 52 Tract: 020200
 53 Tract: 020400
 54 Tract: 020601
 55 Tract: 021001
 56 Tract: 021002

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A. 9040--A

1 Tract: 021200
 2 Tract: 021601
 3 Tract: 021602
 4 Tract: 022200
 5 Tract: 036100
 6 Tract: 001600 Blocks: 1000 2000 3000 4000-4008
 7 Tract: 003800 Block: 1000
 8 Tract: 004400 Block: 3000
 9 Tract: 006000 Blocks: 1000-1009 2000-2005 2010-2012
 10 Tract: 006800 Block: 1000
 11 Tract: 007600 Blocks: 1000 2000 3000 4000-4005 5000-5005
 12 Tract: 009000 Blocks: 0003 1000-1008 3000-3001 4000-4003 5000
 13 Tract: 009600 Blocks: 1000-1008 2002-2025
 14 Tract: 009800 Blocks: 1000-1004 2000-2003 3000-3011 4000-4002
 15 5000-5002 5005
 16 Tract: 020000 Blocks: 1000-1001
 17 Tract: 021800 Blocks: 1000-1001 2000-2001 3000-3006 4000-4006
 18 5000-5008
 19 Tract: 022000 Blocks: 1000-1001 1003-1012
 20 Tract: 024000 Blocks: 1008-1009 3003-3006
 21 Tract: 033400 Blocks: 1026-1031
 22 Tract: 035900 Blocks: 1001 1003-1009 1014-1015
 23 Tract: 036300 Blocks: 1000-1001 2000 3000-3002 4001-4007 5000-5002
 24 6000-6007
 25 88. Assembly District 88.
 26 Within Westchester County
 27 All of Eastchester town
 28 All of Pelham town
 29 All of Scarsdale town
 30 Within New Rochelle city:
 31 Tract: 006400
 32 Tract: 006600
 33 Tract: 006801
 34 Tract: 006802
 35 Within White Plains city:
 36 Tract: 009201
 37 Tract: 009202
 38 Tract: 009500
 39 Tract: 009600
 40 Tract: 009701
 41 Within Greenburgh town:
 42 Tract: 010701 Blocks: 2000-2021 3010-3011 3013-3028 3030-3032
 43 4000-4013
 44 Tract: 010702 Blocks: 1000-1022 2000-2030 3001 3004-3012 5002-5003
 45 Tract: 010801 Blocks: 2009-2013 2017
 46 Within New Rochelle city:
 47 Tract: 005902 Blocks: 2000-2016 2018
 48 Tract: 006000 Blocks: 1000-1009 1014 2000-2001 3000 4000-4004 4007
 49 4014
 50 Tract: 006200 Blocks: 1000-1005
 51 Tract: 006301 Blocks: 1000-1001
 52 Tract: 006302 Blocks: 1000-1002
 53 Tract: 006500 Blocks: 1000-1016 2000-2010 3000-3020 4000-4013
 54 Tract: 006700 Blocks: 1000-1019 2000-2025 3000-3034 4000-4020
 55 Within White Plains city:
 56 Tract: 009100 Block: 2019

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1 Tract: 009300 Blocks: 2004-2006 2008-2009 3000-3003
 2 Tract: 009702 Blocks: 1000-1002 3000-3022
 3 Tract: 009703 Blocks: 1000-1030 2000-2022 3003 3011-3027
 4 89. Assembly District 89.
 5 Within Westchester County
 6 All of Mount Vernon city
 7 Within Yonkers city:
 8 Tract: 000103
 9 Tract: 000104
 10 Tract: 000202
 11 Tract: 000203
 12 Tract: 000204
 13 Tract: 000205
 14 Tract: 000403
 15 Tract: 000404
 16 Tract: 001302
 17 Tract: 001304
 18 Tract: 001305
 19 Tract: 001502
 20 Tract: 001505
 21 Tract: 000101 Blocks: 1000-1004 2006
 22 Tract: 000401 Blocks: 2001-2002 2005-2013 3000-3004
 23 Tract: 000602 Blocks: 1003-1004 2002-2004 2008
 24 Tract: 000701 Blocks: 1002-1003 1006-1008
 25 Tract: 000702 Blocks: 2005 3001-3006
 26 Tract: 000803 Blocks: 2011-2012
 27 Tract: 001301 Blocks: 1007-1009 1015-1025
 28 Tract: 001402 Blocks: 2010-2013
 29 Tract: 001403 Blocks: 1002 2001-2007 3000-3003 4000-4010
 30 Tract: 001503 Blocks: 1000-1012 2000-2009 3000-3010
 31 Tract: 001504 Blocks: 1000-1003 2003-2006 3000-3012 4002-4003
 32 Tract: 002403 Blocks: 4008-4013
 33 90. Assembly District 90.
 34 Within Westchester County
 35 Within Yonkers city:
 36 Tract: 000300
 37 Tract: 000501
 38 Tract: 000502
 39 Tract: 000601
 40 Tract: 001000
 41 Tract: 001101
 42 Tract: 001102
 43 Tract: 001200
 44 Tract: 001401
 45 Tract: 001600
 46 Tract: 001701
 47 Tract: 001702
 48 Tract: 001800
 49 Tract: 002000
 50 Tract: 002101
 51 Tract: 002103
 52 Tract: 002104
 53 Tract: 002105
 54 Tract: 002106
 55 Tract: 002107
 56 Tract: 002201

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1 Tract: 002202
 2 Tract: 002203
 3 Tract: 002204
 4 Tract: 002300
 5 Tract: 002401
 6 Tract: 002402
 7 Tract: 002404
 8 Tract: 002405
 9 Tract: 000101 Blocks: 2000-2005 3000-3002
 10 Tract: 000401 Blocks: 1000-1002 2000 2003-2004 2014 4000-4001
 11 Tract: 000602 Blocks: 1000-1002 1005-1006 2000-2001 2005-2007
 12 Tract: 000701 Blocks: 1000-1001 1004-1005 2004-2016
 13 Tract: 000702 Blocks: 2000-2002 3000
 14 Tract: 000801 Blocks: 1000-1005 2000-2009 3000-3002 4000-4006
 15 5000-5004 5006
 16 Tract: 000802 Blocks: 1000-1006 2008-2009 2011-2013
 17 Tract: 000803 Blocks: 1000-1012 2000-2010 2013-2016 3000-3005
 18 Tract: 000900 Blocks: 1000-1001 1004-1008
 19 Tract: 001301 Blocks: 1000-1006 1010-1014 2000-2021 3000-3008
 20 Tract: 001402 Blocks: 1000-1013 2000-2009
 21 Tract: 001403 Blocks: 1000-1001 1003-1004 2000
 22 Tract: 001503 Block: 4000
 23 Tract: 001504 Blocks: 2000-2002 4000-4001
 24 Tract: 001900 Blocks: 1000-1018 1020-1021
 25 Tract: 002403 Blocks: 1000-1011 2000-2006 3000-3009 4000-4007
 26 4014-4016 5000-5009
 27 91. Assembly District 91.
 28 Within Westchester County.
 29 All of Mamaroneck town
 30 All of Rye city
 31 All of Rye town
 32 Within New Rochelle city:
 33 Tract: 005600
 34 Tract: 005702
 35 Tract: 005703
 36 Tract: 005704
 37 Tract: 005800
 38 Tract: 005901
 39 Tract: 006100
 40 Tract: 005902 Blocks: 1000-1021 2017 2019 3000-3013
 41 Tract: 006000 Blocks: 1010-1013 1015-1016 2002-2009 3001-3010
 42 4005-4006 4008-4013
 43 Tract: 006200 Blocks: 1006-1008 2000-2005 3000-3009 4000-4009
 44 Tract: 006301 Blocks: 1002 2000-2007 3000-3004
 45 Tract: 006302 Blocks: 1003-1018 2000-2010
 46 Tract: 006500 Block: 3021
 47 Tract: 006700 Block: 2026
 48 92. Assembly District 92.
 49 Within Westchester County.
 50 Within Greenburgh town:
 51 Tract: 010200
 52 Tract: 010300
 53 Tract: 010400
 54 Tract: 010500
 55 Tract: 010600
 56 Tract: 010803

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1 Tract: 010804
 2 Tract: 010901
 3 Tract: 010902
 4 Tract: 010903
 5 Tract: 011000
 6 Tract: 011101
 7 Tract: 011102
 8 Tract: 011200
 9 Tract: 011300
 10 Tract: 011401
 11 Tract: 011402
 12 Tract: 011500
 13 Within Mount Pleasant town:
 14 Tract: 011601
 15 Tract: 011602
 16 Tract: 011700
 17 Tract: 011902
 18 Tract: 012000
 19 Tract: 012101
 20 Tract: 012102
 21 Tract: 012201
 22 Tract: 012202
 23 Tract: 981000
 24 Within Greenburgh town:
 25 Tract: 010701 Blocks: 1000-1034 3000-3009 3012 3029
 26 Tract: 010702 Blocks: 3000 3002-3003 4000 5000-5001
 27 Tract: 010801 Blocks: 1000-1034 2000-2008 2014-2016 2018-2021
 28 Within Mount Pleasant town:
 29 Tract: 011800 Blocks: 1000-1002 1004-1013 2000-2028 3000-3070
 30 4000-4031 5000-5021
 31 Within New Castle town:
 32 Tract: 013102 Blocks: 2025 2027-2029
 33 Within Yonkers city:
 34 Tract: 000701 Blocks: 2000-2003
 35 Tract: 000702 Blocks: 1000-1002 2003-2004
 36 Tract: 000801 Block: 5005
 37 Tract: 000802 Blocks: 2000-2007 2010
 38 Tract: 000900 Blocks: 1002-1003 1009-1015 2000-2023 3000-3014
 39 Tract: 001900 Block: 1019
 40 93. Assembly District 93.
 41 Within Westchester County
 42 All of Bedford town
 43 All of Harrison town
 44 All of Lewisboro town
 45 All of Mount Kisco town
 46 All of North Castle town
 47 All of North Salem town
 48 All of Pound Ridge town
 49 Within New Castle town:
 50 Tract: 013103
 51 Tract: 013104
 52 Within White Plains city:
 53 Tract: 008801
 54 Tract: 008802
 55 Tract: 008901
 56 Tract: 008902

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A. 9040--A

1 Tract: 009000
 2 Tract: 009400
 3 Within New Castle town:
 4 Tract: 013102 Blocks: 1000-1029 2000-2024 2026 3000-3023 4000-4020
 5 Within White Plains city:
 6 Tract: 009100 Blocks: 1000-1013 2000-2018 2020-2022 3000-3018
 7 Tract: 009300 Blocks: 1000-1010 2000-2003 2007
 8 Tract: 009702 Blocks: 2000-2033
 9 Tract: 009703 Blocks: 3000-3002 3004-3010
 10 94. Assembly District 94.
 11 Within Putnam County
 12 All of Carmel town
 13 All of Kent town
 14 All of Patterson town
 15 All of Putnam Valley town
 16 All of Southeast town
 17 Within Westchester County
 18 All of Somers town
 19 Within Yorktown town:
 20 Tract: 014808
 21 Tract: 014810
 22 Tract: 014811
 23 Tract: 014805 Block: 2038
 24 Tract: 014806 Blocks: 1000 1002-1021 2000-2012 3000-3010 4000-4015
 25 5000-5020
 26 Tract: 014809 Blocks: 1000-1021 2000-2006 3000-3010 3014-3020
 27 4000-4046
 28 95. Assembly District 95.
 29 Within Putnam County
 30 All of Philipstown town
 31 Within Westchester County
 32 All of Cortlandt town
 33 All of Ossining town
 34 All of Peekskill city
 35 Within Yorktown town:
 36 Tract: 014812
 37 Tract: 014813
 38 Within Mount Pleasant town:
 39 Tract: 011800 Block: 1003
 40 Within Yorktown town:
 41 Tract: 014805 Blocks: 1000-1034 2000-2037 2039-2079
 42 Tract: 014806 Blocks: 1001 2013
 43 Tract: 014809 Blocks: 3011-3013
 44 96. Assembly District 96.
 45 Within Rockland County
 46 All of Clarkstown town
 47 All of Haverstraw town
 48 Within Orangetown town:
 49 Tract: 013101
 50 Tract: 013102
 51 Tract: 013200
 52 Tract: 012800 Block: 5014
 53 97. Assembly District 97.
 54 Within Rockland County
 55 Within Orangetown town:
 56 Tract: 012600

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1 Tract: 012700
 2 Tract: 013001
 3 Tract: 013002
 4 Tract: 013003
 5 Tract: 013300
 6 Tract: 013401
 7 Tract: 013402
 8 Within Ramapo town:
 9 Tract: 011505
 10 Tract: 011506
 11 Tract: 011509
 12 Tract: 011511
 13 Tract: 011512
 14 Tract: 012107
 15 Tract: 012108
 16 Tract: 012109
 17 Tract: 012110
 18 Tract: 012115
 19 Tract: 012203
 20 Tract: 012204
 21 Tract: 012205
 22 Tract: 012206
 23 Tract: 012301
 24 Tract: 012302
 25 Tract: 012401
 26 Tract: 012403
 27 Tract: 012404
 28 Tract: 012503
 29 Tract: 012504
 30 Tract: 012800 Blocks: 1000-1021 2000-2014 3000-3015 4000-4013
 31 5000-5013 5015-5048
 32 Within Ramapo town:
 33 Tract: 011507 Blocks: 1000-1015
 34 Tract: 011508 Block: 3000
 35 Tract: 011510 Blocks: 1012-1013 2000-2005 2007-2012 3000-3016
 36 Tract: 011601 Block: 3000
 37 Tract: 012112 Blocks: 1000-1009 2000-2007 3000
 38 Tract: 012113 Blocks: 1000-1015 2000-2004 2007 2009-2010
 39 Tract: 012114 Block: 1000
 40 Tract: 012116 Blocks: 1000-1004 2006-2007
 41 Tract: 012505 Blocks: 2000-2011
 42 Tract: 012506 Blocks: 1000-1005 2014-2026
 43 98. Assembly District 98.
 44 Within Orange County
 45 All of Deerpark town
 46 All of Greenville town
 47 All of Minisink town
 48 All of Mount Hope town
 49 All of Port Jervis city
 50 All of Tuxedo town
 51 All of Warwick town
 52 All of Wawayanda town
 53 Within Rockland County
 54 Within Ramapo town:
 55 Tract: 011602
 56 Tract: 011603

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1 Tract: 011700
 2 Tract: 011800
 3 Tract: 011901
 4 Tract: 011902
 5 Tract: 012000
 6 Tract: 012111
 7 Within Orange County
 8 Within Goshen town:
 9 Tract: 011900 Blocks: 1000-1062 2000-2015 2017-2061 3000-3008
 10 4000-4011 5010-5025 5028-5032
 11 Within Monroe town:
 12 Tract: 014101 Block: 1006
 13 Tract: 014201 Blocks: 1000 1004 1008-1024 2002-2005 2017 3000-3032
 14 Tract: 014202 Blocks: 1003 1005-1011 1015-1016 2004-2013 2018-2019
 15 3012 3014-3015 3023-3024 3026-3028 4000-4002 4014-4017 5001-5026
 16 Within Rockland County
 17 Within Ramapo town:
 18 Tract: 011507 Blocks: 1016-1020 2000-2021
 19 Tract: 011508 Blocks: 1000-1007 2000-2010 3001-3018
 20 Tract: 011510 Blocks: 1000-1011 2006
 21 Tract: 011601 Blocks: 1000-1016 2000-2018 3001-3062
 22 Tract: 012112 Blocks: 3001-3004
 23 Tract: 012113 Blocks: 2005-2006 2008
 24 Tract: 012114 Blocks: 1001-1018
 25 Tract: 012116 Blocks: 2000-2005
 26 Tract: 012505 Blocks: 1000-1016
 27 Tract: 012506 Blocks: 2000-2013 2027
 28 99. Assembly District 99.
 29 Within Orange County
 30 All of Cornwall town
 31 All of Highlands town
 32 All of New Windsor town
 33 All of Palm Tree town
 34 All of Woodbury town
 35 Within Rockland County
 36 All of Stony Point town
 37 Within Orange County
 38 Within Monroe town:
 39 Tract: 014102
 40 Tract: 015003
 41 Tract: 015005
 42 Tract: 015007
 43 Tract: 015009
 44 Tract: 014101 Blocks: 1000-1005 1007-1029 2000-2033 3000-3017
 45 Tract: 014201 Blocks: 1001-1003 1005-1007 2000-2001 2006-2016
 46 2018-2019
 47 Tract: 014202 Blocks: 1000-1002 1004 1012-1014 2000-2003 2014-2017
 48 3000-3011 3013 3016-3022 3025 4003-4013 5000
 49 100. Assembly District 100.
 50 Within Orange County
 51 All of Middletown city
 52 All of Wallkill town
 53 Within Sullivan County
 54 All of Bethel town
 55 All of Callicoon town
 56 All of Cochecton town

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A. 9040--A

1 All of Delaware town
 2 All of Fallsburg town
 3 All of Forestburgh town
 4 All of Highland town
 5 All of Liberty town
 6 All of Lumberland town
 7 All of Mamakating town
 8 All of Rockland town
 9 All of Thompson town
 10 All of Tusten town
 11 Within Orange County
 12 All of Wawayanda town
 13 101. Assembly District 101.
 14 Within Delaware County
 15 All of Andes town
 16 All of Franklin town
 17 All of Handen town
 18 Within Madison County
 19 All of Brookfield town
 20 Within Orange County
 21 All of Blooming Grove town
 22 All of Chester town
 23 All of Crawford town
 24 All of Hamptonburgh town
 25 All of Montgomery town
 26 Within Otsego County
 27 All of Edmeston town
 28 All of Laurens town
 29 All of Morris town
 30 All of Otego town
 31 All of Pittsfield town
 32 Within Sullivan County
 33 All of Neversink town
 34 Within Ulster County
 35 All of Denning town
 36 Within Ulster County
 37 All of Hardenburgh town
 38 All of Rochester town
 39 All of Shawangunk town
 40 All of Wawarsing town
 41 Within Orange County
 42 Within Goshen town:
 43 Tract: 012100
 44 Tract: 012200
 45 Tract 011900: Blocks: 2016 5000-5009 5026-5027 5033-5049
 46 102. Assembly District 102.
 47 All of Greene County
 48 All of Schoharie County
 49 Within Albany County
 50 All of Berne town
 51 All of Coeymans town
 52 All of Knox town
 53 All of Rensselaerville town
 54 All of Westerlo town
 55 Within Delaware County
 56 All of Bovina town

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A. 9040--A

1 All of Davenport town
 2 All of Delhi town
 3 All of Harpersfield town
 4 All of Kortright town
 5 All of Meredith town
 6 All of Middletown town
 7 All of Roxbury town
 8 All of Stamford town
 9 Within Otsego County
 10 All of Cherry Valley town
 11 All of Decatur town
 12 All of Maryland town
 13 All of Middlefield town
 14 All of Otsego town
 15 All of Roseboom town
 16 All of Springfield town
 17 All of Westford town
 18 All of Worcester town
 19 Within Ulster County
 20 All of Shandaken town
 21 Within Albany County
 22 Within Bethlehem town:
 23 Tract: 014301 Blocks: 1002-1019 2026-2037
 24 Tract: 014304 Blocks: 1000-1028 2008-2011 2017-2020 2022-2039 2044
 25 2054 2056-2057
 26 103. Assembly District 103.
 27 Within Dutchess County
 28 All of Red Hook town
 29 All of Rhinebeck town
 30 Within Ulster County
 31 All of Esopus town
 32 All of Gardiner town
 33 All of Hurley town
 34 All of Kingston city
 35 All of Kingston town
 36 All of Marbletown town
 37 All of New Paltz town
 38 All of Olive town
 39 All of Rosendale town
 40 All of Saugerties town
 41 All of Ulster town
 42 All of Woodstock town
 43 104. Assembly District 104.
 44 Within Dutchess County
 45 All of Beacon city
 46 All of Poughkeepsie city
 47 All of Newburgh city
 48 All of Newburgh town
 49 Within Ulster County
 50 All of Lloyd town
 51 All of Marlborough town
 52 All of Plattekill town
 53 Within Dutchess County
 54 Within Fishkill town:
 55 Tract: 060202 Blocks: 3020-3022
 56 105. Assembly District 105.

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A. 9040--A

1 Within Dutchess County
 2 All of Amenia town
 3 All of Beekman town
 4 All of Dover town
 5 All of East Fishkill town
 6 All of LaGrange town
 7 All of Pawling town
 8 All of Union Vale town
 9 All of Wappinger town
 10 Within Fishkill town:
 11 Tract: 060100
 12 Tract: 060201
 13 Tract: 060301
 14 Tract: 060302
 15 Tract: 060400
 16 Tract: 640001
 17 Tract: 060202 Blocks: 1000-1020 2000-2015 3000-3019 3023-3025
 18 4000-4014
 19 Tract: 640002 Blocks: 1000-1002 1010
 20 106. Assembly District 106.
 21 Within Columbia County
 22 All of Ancram town
 23 All of Austerlitz town
 24 All of Canaan town
 25 All of Claverack town
 26 All of Clermont town
 27 All of Copake town
 28 All of Gallatin town
 29 All of Germantown town
 30 All of Greenport town
 31 All of Hillsdale town
 32 All of Hudson city
 33 All of Livingston town
 34 All of New Lebanon town
 35 All of Taghkanic town
 36 Within Dutchess County
 37 All of Clinton town
 38 All of Hyde Park town
 39 All of Milan town
 40 All of North East town
 41 All of Pine Plains town
 42 All of Pleasant Valley town
 43 All of Poughkeepsie town
 44 All of Stanford town
 45 All of Washington town
 46 Within Columbia County
 47 Within Chatham town:
 48 Tract: 000300 Blocks: 1000-1067 1073 2000-2079 3000-3005 3007-3008
 49 3015-3030 4000-4027 4029-4030 4036 4038-4040 5000-5016 5020-5025
 50 5028-5032
 51 107. Assembly District 107.
 52 Within Columbia County
 53 All of Ghent town
 54 All of Kinderhook town
 55 All of Stockport town
 56 All of Stuyvesant town

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A. 9040--A

1 Within Rensselaer County
 2 All of Berlin town
 3 All of Brunswick town
 4 All of Grafton town
 5 All of Hoosick town
 6 All of Nassau town
 7 All of Petersburg town
 8 All of Pittstown town
 9 All of Poestenkill town
 10 All of Sand Lake town
 11 All of Schaghticoke town
 12 All of Schodack town
 13 All of Stephentown town
 14 Within Washington County
 15 All of Cambridge town
 16 All of Easton town
 17 All of White Creek town
 18 Within Albany County
 19 Within Bethlehem town:
 20 Tract: 014100
 21 Tract: 014201
 22 Tract: 014202
 23 Tract: 014203
 24 Tract: 014303
 25 Tract: 014301 Blocks: 1000-1001 1020-1024 2000-2025 2038-2059
 26 Tract: 014304 Blocks: 2000-2007 2012-2016 2021 2040-2043 2045-2053
 27 2055 2058
 28 Within Columbia County
 29 Within Chatham town:
 30 Tract: 000300 Blocks: 1068-1072 1074-1078 3006 3009-3014 3031 4028
 31 4031-4035 4037 5017-5019 5026-5027 5033-5034
 32 108. Assembly District 108.
 33 Within Albany County
 34 All of Cohoes city
 35 All of Green Island town
 36 All of Watervliet city
 37 Within Rensselaer County
 38 All of East Greenbush town
 39 All of North Greenbush town
 40 All of Rensselaer city
 41 All of Troy city
 42 Within Saratoga County
 43 All of Waterford town
 44 Within Albany County
 45 Within Albany city:
 46 Tract: 000100 Blocks: 1000 1040
 47 Tract: 001100 Blocks: 1018-1019 1117
 48 Tract: 002500 Blocks: 1000 1006
 49 109. Assembly District 109.
 50 Within Albany County
 51 All of New Scotland town
 52 Within Albany city:
 53 Tract: 000201
 54 Tract: 000202
 55 Tract: 000301
 56 Tract: 000302

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A. 9040--A

1 Tract: 000401
 2 Tract: 000403
 3 Tract: 000404
 4 Tract: 000501
 5 Tract: 000502
 6 Tract: 000600
 7 Tract: 000700
 8 Tract: 000800
 9 Tract: 001400
 10 Tract: 001500
 11 Tract: 001600
 12 Tract: 001700
 13 Tract: 001802
 14 Tract: 001803
 15 Tract: 001804
 16 Tract: 001901
 17 Tract: 001902
 18 Tract: 002000
 19 Tract: 002100
 20 Tract: 002200
 21 Tract: 002300
 22 Tract: 002600
 23 Within Guilderland town:
 24 Tract: 014608
 25 Tract: 014609
 26 Tract: 014611
 27 Tract: 014612
 28 Tract: 014613
 29 Tract: 014614
 30 Tract: 014615
 31 Within Albany city:
 32 Tract: 000100 Blocks: 1001-1039 1041-1043 2000-2009
 33 Tract: 001100 Blocks: 1000-1017 1020-1121
 34 Tract: 002500 Blocks: 1001-1031 2000-2010 3000-3018 4000-4011
 35 Within Guilderland town:
 36 Tract: 014617 Blocks: 1012 1014 2011-2028
 37 110. Assembly District 110.
 38 Within Albany County
 39 All of Colonie town
 40 Within Schenectady County
 41 All of Niskayuna town
 42 Within Albany County
 43 Within Guilderland town:
 44 Tract: 014606
 45 Tract: 014616
 46 Within Schenectady County
 47 Within Schenectady city:
 48 Tract: 021801
 49 Tract: 021802
 50 Within Albany County
 51 Within Guilderland town:
 52 Tract: 014617 Blocks: 1000-1011 1013 2000-2010 2029-2033
 53 Within Schenectady County
 54 Within Schenectady city:
 55 Tract: 020600 Blocks: 1000-1022 1025-1031 2000-2002 2007-2008
 56 2015-2018

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A. 9040--A

1 Tract: 020700 Blocks: 1000-1010 3007
 2 Tract: 021700 Blocks: 2003-2006 3005-3015
 3 111. Assembly District 111.
 4 Within Montgomery County
 5 All of Amsterdam city
 6 All of Amsterdam town
 7 All of Florida town
 8 Within Schenectady County
 9 All of Duanesburg town
 10 All of Princetown town
 11 All of Rotterdam town
 12 Within Glenville town:
 13 Tract: 032200
 14 Tract: 032300
 15 Within Schenectady city:
 16 Tract: 020101
 17 Tract: 020102
 18 Tract: 020200
 19 Tract: 020300
 20 Tract: 020500
 21 Tract: 020800
 22 Tract: 020900
 23 Tract: 021001
 24 Tract: 021002
 25 Tract: 021200
 26 Tract: 021400
 27 Tract: 021500
 28 Tract: 021600
 29 Tract: 033200
 30 Tract: 033400
 31 Tract: 033500
 32 Within Glenville town:
 33 Tract: 032403 Block: 2030
 34 Within Schenectady city:
 35 Tract: 020600 Blocks: 1023-1024 2003-2006 2009-2014
 36 Tract: 020700 Blocks: 2000-2005 3000-3006 4000-4005 5000-5008
 37 Tract: 021700 Blocks: 1000-1009 2000-2002 3000-3004 4000-4002
 38 112. Assembly District 112.
 39 Within Fulton County
 40 All of Broadalbin town
 41 Within Saratoga County
 42 All of Ballston town
 43 All of Charlton town
 44 All of Clifton Park town
 45 All of Galway town
 46 All of Halfmoon town
 47 All of Milton town
 48 All of Providence town
 49 Within Schenectady County
 50 Within Glenville town:
 51 Tract: 032402
 52 Tract: 032404
 53 Tract: 032502
 54 Tract: 032503
 55 Tract: 032504
 56 Tract: 032403 Blocks: 1000-1053 2000-2029 2031-2033

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A. 9040--A

1 113. Assembly District 113.
 2 Within Saratoga County
 3 All of Malta town
 4 All of Mechanicville city
 5 All of Moreau town
 6 All of Northumberland town
 7 All of Saratoga Springs city
 8 All of Saratoga town
 9 All of Stillwater town
 10 All of Wilton town
 11 Within Warren County
 12 All of Glens Falls city
 13 Within Washington County
 14 All of Fort Edward town
 15 All of Greenwich town
 16 Within Kingsbury town:
 17 Tract: 080100
 18 Tract: 080200
 19 114. Assembly District 114.
 20 Within Essex County
 21 All of Chesterfield town
 22 All of Crown Point town
 23 All of Elizabethtown town
 24 All of Essex town
 25 All of Lewis town
 26 All of Minerva town
 27 All of Moriah town
 28 All of Newcomb town
 29 All of North Hudson town
 30 All of Schroon town
 31 All of Ticonderoga town
 32 All of Westport town
 33 All of Willsboro town
 34 Within Fulton County
 35 All of Northampton town
 36 Within Saratoga County
 37 All of Corinth town
 38 All of Day town
 39 All of Edinburg town
 40 All of Greenfield town
 41 All of Hadley town
 42 Within Warren County
 43 All of Bolton town
 44 All of Chester town
 45 All of Hague town
 46 All of Horicon town
 47 All of Johnsbury town
 48 All of Lake George town
 49 All of Lake Luzerne town
 50 All of Queensbury town
 51 All of Stony Creek town
 52 All of Thurman town
 53 All of Warrensburg town
 54 Within Washington County
 55 All of Argyle town
 56 All of Dresden town

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91

A. 9040--A

1 All of Fort Ann town
 2 All of Granville town
 3 All of Hampton town
 4 All of Hartford town
 5 All of Hebron town
 6 All of Jackson town
 7 All of Putnam town
 8 All of Salem town
 9 All of Whitehall town
 10 Within Kingsbury town:
 11 Tract: 080301
 12 Tract: 080302
 13 115. Assembly District 115.
 14 All of Clinton County
 15 All of Franklin County
 16 Within Essex County
 17 All of Jay town
 18 All of Keene town
 19 All of North Elba town
 20 All of St. Armand town
 21 All of Wilmington town
 22 116. Assembly District 116.
 23 Within Jefferson County
 24 All of Alexandria town
 25 All of Antwerp town
 26 All of Brownville town
 27 All of Cape Vincent town
 28 All of Clayton town
 29 All of County subdivisions not defined
 30 All of Henderson town
 31 All of Hounsfield town
 32 All of Lyme town
 33 All of Orleans town
 34 All of Pamela town
 35 All of Philadelphia town
 36 All of Theresa town
 37 All of Watertown city
 38 All of Watertown town
 39 Within St. Lawrence County
 40 All of Canton town
 41 All of De Peyster town
 42 All of Hammond town
 43 All of Lisbon town
 44 All of Louisville town
 45 All of Macomb town
 46 All of Massena town
 47 All of Morristown town
 48 All of Ogdensburg city
 49 All of Oswegatchie town
 50 All of Potsdam town
 51 All of Rossie town
 52 All of Waddington town
 53 117. Assembly District 117.
 54 All of Lewis County
 55 Within Jefferson County
 56 All of Champion town

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92

A. 9040--A

1 All of Le Ray town
2 All of Rodman town
3 All of Rutland town
4 All of Wilna town
5 Within Oneida County
6 All of Annsville town
7 All of Ava town
8 All of Boonville town
9 All of Camden town
10 All of Florence town
11 All of Forestport town
12 All of Lee town
13 All of Vienna town
14 Within St. Lawrence County
15 All of Brasher town
16 All of Clare town
17 All of Clifton town
18 All of Colton town
19 All of De Kalb town
20 All of Edwards town
21 All of Fine town
22 All of Fowler town
23 All of Gouverneur town
24 All of Hermon town
25 All of Hopkinton town
26 All of Lawrence town
27 All of Madrid town
28 All of Norfolk town
29 All of Parishville town
30 All of Piercefield town
31 All of Pierrepoint town
32 All of Pitcairn town
33 All of Russell town
34 All of Stockholm town
35 118. Assembly District 118.
36 All of Hamilton County
37 Within Fulton County
38 All of Bleecker town
39 All of Caroga town
40 All of Ephratah town
41 All of Gloversville city
42 All of Johnstown city
43 All of Johnstown town
44 All of Mayfield town
45 All of Oppenheim town
46 All of Perth town
47 All of Stratford town
48 Within Herkimer County
49 All of Columbia town
50 All of Danube town
51 All of Fairfield town
52 All of Frankfort town
53 All of German Flatts town
54 All of Herkimer town
55 All of Little Falls city
56 All of Little Falls town

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93

A. 9040--A

1 All of Manheim town
 2 All of Newport town
 3 All of Norway town
 4 All of Ohio town
 5 All of Russia town
 6 All of Salisbury town
 7 All of Schuyler town
 8 All of Stark town
 9 All of Warren town
 10 All of Webb town
 11 Within Montgomery County
 12 All of Canajoharie town
 13 All of Charleston town
 14 All of Glen town
 15 All of Minden town
 16 All of Mohawk town
 17 All of Palatine town
 18 All of Root town
 19 All of St. Johnsville town
 20 Within Oneida County
 21 All of Renssen town
 22 All of Steuben town
 23 All of Trenton town
 24 All of Western town
 25 119. Assembly District 119.
 26 Within Oneida County
 27 All of Deerfield town
 28 All of Floyd town
 29 All of Marcy town
 30 All of Rome city
 31 All of Utica city
 32 All of Whitestown town
 33 120. Assembly District 120.
 34 All of Oswego County
 35 Within Cayuga County
 36 All of County subdivisions not defined
 37 All of Ira town
 38 All of Sterling town
 39 All of Victory town
 40 Within Jefferson County
 41 All of Adams town
 42 All of Ellisburg town
 43 All of Lorraine town
 44 All of Worth town
 45 121. Assembly District 121.
 46 Within Broome County
 47 All of Binghamton town
 48 All of Chenango town
 49 All of Colesville town
 50 All of Conklin town
 51 All of Dickinson town
 52 All of Fenton town
 53 All of Kirkwood town
 54 All of Sanford town
 55 All of Windsor town
 56 Within Chenango County

S. 8185--A

94

A. 9040--A

1 All of Afton town
2 All of Bainbridge town
3 All of Columbus town
4 All of Coventry town
5 All of Greene town
6 All of Guilford town
7 All of McDonough town
8 All of New Berlin town
9 All of North Norwich town
10 All of Norwich city
11 All of Norwich town
12 All of Otselic town
13 All of Oxford town
14 All of Pharsalia town
15 All of Plymouth town
16 All of Preston town
17 All of Sherburne town
18 All of Smithville town
19 All of Smyrna town
20 Within Delaware County
21 All of Colchester town
22 All of Deposit town
23 All of Hancock town
24 All of Masonville town
25 All of Sidney town
26 All of Tompkins town
27 All of Walton town
28 Within Madison County
29 All of Eaton town
30 All of Georgetown town
31 All of Hamilton town
32 All of Lebanon town
33 All of Madison town
34 All of Nelson town
35 Within Otsego County
36 All of Butternuts town
37 All of Unadilla town
38 Within Sullivan County
39 All of Fremont town
40 122. Assembly District 122.
41 Within Herkimer County
42 All of Litchfield town
43 All of Winfield town
44 Within Madison County
45 All of Fenner town
46 All of Lenox town
47 All of Lincoln town
48 All of Oneida city
49 All of Smithfield town
50 All of Stockbridge town
51 All of Sullivan town
52 Within Oneida County
53 All of Augusta town
54 All of Bridgewater town
55 All of Kirkland town
56 All of Marshall town

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A. 9040--A

1 All of New Hartford town
2 All of Paris town
3 All of Sangerfield town
4 All of Vernon town
5 All of Verona town
6 All of Westmoreland town
7 Within Otsego County
8 All of Burlington town
9 All of Exeter town
10 All of Hartwick town
11 All of Milford town
12 All of New Lisbon town
13 All of Oneonta city
14 All of Oneonta town
15 All of Plainfield town
16 All of Richfield town
17 123. Assembly District 123.
18 Within Broome County
19 All of Binghamton city
20 All of Union town
21 All of Vestal town
22 124. Assembly District 124.
23 All of Tioga County
24 Within Broome County
25 All of Barker town
26 All of Lisle town
27 All of Maine town
28 All of Nanticoke town
29 Within Chemung County
30 All of Ashland town
31 All of Baldwin town
32 All of Big Flats town
33 All of Chemung town
34 All of Elmira city
35 All of Elmira town
36 All of Horseheads town
37 All of Southport town
38 125. Assembly District 125.
39 All of Tompkins County
40 Within Cortland County
41 All of Cortland city
42 All of Cortlandville town
43 All of Harford town
44 All of Lapeer town
45 All of Virgil town
46 126. Assembly District 126.
47 Within Cayuga County
48 All of Auburn city
49 All of Brutus town
50 All of Cato town
51 All of Conquest town
52 All of Mentz town
53 All of Owasco town
54 All of Sennett town
55 All of Throop town
56 Within Onondaga County

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A. 9040--A

1 All of Camillus town
 2 All of Elbridge town
 3 All of Fabius town
 4 All of LaFayette town
 5 All of Lysander town
 6 All of Marcellus town
 7 All of Otisco town
 8 All of Pompey town
 9 All of Skaneateles town
 10 All of Spafford town
 11 All of Tully town
 12 127. Assembly District 127.
 13 Within Madison County
 14 All of Cazenovia town
 15 Within Onondaga County
 16 All of Cicero town
 17 All of Clay town
 18 All of Manlius town
 19 128. Assembly District 128.
 20 Within Onondaga County
 21 All of De Witt town
 22 All of Onondaga Nation Reservation
 23 All of Onondaga town
 24 All of Salina town
 25 Within Onondaga County
 26 Within Syracuse city:
 27 Tract: 003900
 28 Tract: 004600
 29 Tract: 005100
 30 Tract: 005200
 31 Tract: 005300
 32 Tract: 005800
 33 Tract: 005900
 34 Tract: 002400 Blocks: 1007
 35 Tract: 003000 Blocks: 1021-1024 1026-1030 2002-2006 2008
 36 Tract: 003200 Blocks: 1056-1057 2014-2016 2019-2029
 37 Tract: 003400 Blocks: 1000 2000-2002 2008-2024 2033-2046
 38 Tract: 003500 Blocks: 1000-1011 2001-2002 2004-2021
 39 Tract: 003601 Blocks: 1001-1013 2000-2012
 40 Tract: 003602 Blocks: 1004-1005 1007-1017 2000-2019
 41 Tract: 003800 Blocks: 1000-1004 1006-1007 1015-1017 2000-2001
 42 2004-2005
 43 Tract: 004000 Blocks: 1004-1007 1010 1014-1018
 44 Tract: 004200 Blocks: 1000-1005 1007 2000-2002 2008-2017 2019-2034
 45 Tract: 004301 Blocks: 1002 1004 1006
 46 Tract: 004302 Blocks: 1011 3007-3012
 47 Tract: 004401 Blocks: 1000 1005 3000-3025
 48 Tract: 004500 Blocks: 1000-1007 3000-3001 3003-3006 3010-3011
 49 3014-3016
 50 Tract: 004900 Blocks: 1000-1002 1011
 51 Tract: 005000 Blocks: 1000-1003 1006-1009 1022
 52 Tract: 005400 Blocks: 1000-1013 2000-2003 2005-2018
 53 Tract: 005500 Blocks: 3004-3005
 54 Tract: 005700 Blocks: 1000 2000-2012 2015-2017
 55 Tract: 006000 Blocks: 1000-1013 3000-3001 3003-3005 3010 3020 4000
 56 Tract: 006101 Blocks: 1000-1013 2000-2009 3000-3005

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A. 9040--A

1 129. Assembly District 129.
 2 Within Onondaga County
 3 All of Geddes town
 4 All of Van Buren town
 5 Within Syracuse city:
 6 Tract: 000100
 7 Tract: 000200
 8 Tract: 000300
 9 Tract: 000400
 10 Tract: 000501
 11 Tract: 000600
 12 Tract: 000700
 13 Tract: 000800
 14 Tract: 000900
 15 Tract: 001400
 16 Tract: 001500
 17 Tract: 001600
 18 Tract: 001701
 19 Tract: 001702
 20 Tract: 001800
 21 Tract: 001900
 22 Tract: 002000
 23 Tract: 002101
 24 Tract: 002300
 25 Tract: 002700
 26 Tract: 002901
 27 Tract: 004800
 28 Tract: 005601
 29 Tract: 005602
 30 Tract: 006102
 31 Tract: 006103
 32 Tract: 013200
 33 Within Syracuse city:
 34 Tract: 001000 Blocks: 1000-1008 2000-2014 3000-3013 4000-4002
 35 4004-4006
 36 Tract: 002400 Blocks: 1000-1006 1008-1011 2000-2006
 37 Tract: 003000 Blocks: 1000-1020 1025 2000-2001 2007
 38 Tract: 003200 Blocks: 1000-1055 2000-2013 2017-2018 2030
 39 Tract: 003400 Blocks: 1001-1007 2003-2007 2025-2032 2047-2048
 40 Tract: 003500 Blocks: 2000 2003
 41 Tract: 003601 Block: 1000
 42 Tract: 003602 Blocks: 1000-1003 1006
 43 Tract: 003800 Blocks: 1005 1008-1014 1018 2002-2003 2006-2008
 44 Tract: 004000 Blocks: 1000-1003 1008-1009 1011-1013 1019
 45 Tract: 004200 Blocks: 1006 2003-2007 2018
 46 Tract: 004301 Blocks: 1000-1001 1003 1005 1007-1020
 47 Tract: 004302 Blocks: 1000-1010 2000-2014 3000-3006 4000-4010
 48 Tract: 004401 Blocks: 1001-1004 2000-2013
 49 Tract: 004500 Blocks: 2000-2006 3002 3007-3009 3012-3013 3017
 50 Tract: 004900 Blocks: 1003-1010 1012-1016 2000-2011
 51 Tract: 005000 Blocks: 1004-1005 1010-1021 1023-1030 2000-2020
 52 Tract: 005400 Block: 2004
 53 Tract: 005500 Blocks: 1000-1009 2000-2011 3000-3003 3006-3008
 54 Tract: 005700 Blocks: 1001-1008 2013-2014 2018
 55 Tract: 006000 Blocks: 2000-2009 3002 3006-3009 3011-3019 4001-4008
 56 Tract: 006101 Blocks: 2010 3006

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1 130. Assembly District 130.
2 All of Wayne County
3 Within Monroe County
4 All of Webster town
5 131. Assembly District 131.
6 Within Broome County
7 All of Triangle town
8 Within Cayuga County
9 All of Aurelius town
10 All of Fleming town
11 All of Genoa town
12 All of Ledyard town
13 All of Locke town
14 All of Montezuma town
15 All of Moravia town
16 All of Niles town
17 All of Scipio town
18 All of Sempronius town
19 All of Springport town
20 All of Summerhill town
21 All of Venice town
22 Within Chenango County
23 All of German town
24 All of Lincklaen town
25 All of Pitcher town
26 Within Cortland County
27 All of Cincinnatus town
28 All of Cuyler town
29 All of Freetown town
30 All of Homer town
31 All of Marathon town
32 All of Preble town
33 All of Scott town
34 All of Solon town
35 All of Taylor town
36 All of Truxton town
37 All of Willet town
38 Within Madison County
39 All of DeRuyter town
40 Within Ontario County
41 All of Canandaigua city
42 All of Canandaigua town
43 All of Geneva city
44 All of Geneva town
45 All of Gorham town
46 All of Hopewell town
47 All of Manchester town
48 All of Phelps town
49 All of Seneca town
50 Within Seneca County
51 All of Fayette town
52 All of Geneva city
53 All of Junius town
54 All of Seneca Falls town
55 All of Tyre town
56 All of Waterloo town

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A. 9040--A

1 132. Assembly District 132.
2 All of Schuyler County
3 All of Yates County
4 Within Chemung County
5 All of Catlin town
6 All of Erin town
7 All of Van Etten town
8 All of Veteran town
9 Within Seneca County
10 All of Covert town
11 All of Lodi town
12 All of Ovid town
13 All of Romulus town
14 All of Varick town
15 Within Steuben County
16 All of Addison town
17 All of Avoca town
18 All of Bath town
19 All of Bradford town
20 All of Cameron town
21 All of Campbell town
22 All of Caton town
23 All of Corning city
24 All of Corning town
25 All of Erwin town
26 All of Fremont town
27 All of Hornby town
28 All of Hornell city
29 All of Hornellsville town
30 All of Howard town
31 All of Lindley town
32 All of Pulteney town
33 All of Rathbone town
34 All of Thurston town
35 All of Tuscarora town
36 All of Urbana town
37 All of Wayne town
38 All of Wheeler town
39 All of Woodhull town
40 133. Assembly District 133.
41 All of Livingston County
42 Within Monroe County
43 All of Rush town
44 All of Wheatland town
45 Within Ontario County
46 All of Bristol town
47 All of Canadice town
48 All of East Bloomfield town
49 All of Farmington town
50 All of Naples town
51 All of Richmond town
52 All of South Bristol town
53 All of Victor town
54 All of West Bloomfield town
55 Within Steuben County
56 All of Cohocton town

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A. 9040--A

1 All of Dansville town
 2 All of Prattsburgh town
 3 All of Wayland town
 4 Within Wyoming County
 5 All of Perry town
 6 134. Assembly District 134.
 7 Within Monroe County
 8 All of Greece town
 9 All of Ogden town
 10 All of Parma town
 11 135. Assembly District 135.
 12 Within Monroe County
 13 All of East Rochester town
 14 All of Mendon town
 15 All of Penfield town
 16 All of Perinton town
 17 All of Pittsford town
 18 136. Assembly District 136.
 19 Within Monroe County
 20 All of Brighton town
 21 All of Irondequoit town
 22 Within Rochester city:
 23 Tract: 001800
 24 Tract: 001900
 25 Tract: 002000
 26 Tract: 002100
 27 Tract: 002200
 28 Tract: 004701
 29 Tract: 006100
 30 Tract: 008500
 31 Tract: 008600
 32 Tract: 010500
 33 Tract: 010601
 34 Tract: 010700
 35 Tract: 010800
 36 Tract: 010901
 37 Tract: 010902
 38 Tract: 011000
 39 Tract: 980100
 40 Tract: 002300 Blocks: 2000
 41 Tract: 003807 Blocks: 3021 3027
 42 Tract: 004602 Blocks: 1000-1003 2000-2001 3000
 43 Tract: 004702 Blocks: 1000-1005 2000-2011 3000-3006
 44 Tract: 006000 Blocks: 3000-3003 3005-3008 4000-4002
 45 Tract: 007600 Blocks: 1000-1010 2000-2005 3000-3003 3009-3010
 46 Tract: 007700 Blocks: 1000-1006 2000-2008 3000-3005 3008
 47 Tract: 007802 Blocks: 1000-1007 1009
 48 Tract: 007900 Blocks: 1000-1004
 49 Tract: 008100 Blocks: 1000-1015 2003-2008
 50 Tract: 008200 Blocks: 1000-1017 1020 2000-2003 2005-2007
 51 Tract: 008301 Blocks: 1000-1034 1037-1042 1045-1048 2000-2001
 52 2003-2013
 53 137. Assembly District 137.
 54 Within Monroe County
 55 All of Gates town
 56 Within Rochester city:

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S. 8185--A

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A. 9040--A

1 Tract: 000200
 2 Tract: 000700
 3 Tract: 001300
 4 Tract: 001600
 5 Tract: 002400
 6 Tract: 002700
 7 Tract: 003900
 8 Tract: 004000
 9 Tract: 004100
 10 Tract: 004800
 11 Tract: 004900
 12 Tract: 005000
 13 Tract: 005100
 14 Tract: 005200
 15 Tract: 005500
 16 Tract: 006200
 17 Tract: 006300
 18 Tract: 006400
 19 Tract: 006500
 20 Tract: 006600
 21 Tract: 006700
 22 Tract: 006800
 23 Tract: 006900
 24 Tract: 007100
 25 Tract: 007500
 26 Tract: 008000
 27 Tract: 008400
 28 Tract: 008702
 29 Tract: 008801
 30 Tract: 009200
 31 Tract: 009301
 32 Tract: 009401
 33 Tract: 009403
 34 Tract: 009404
 35 Tract: 009500
 36 Tract: 009601
 37 Tract: 009602
 38 Tract: 009605
 39 Tract: 980200
 40 Tract: 001000 Blocks: 3003 3006
 41 Tract: 002300 Blocks: 1000-1011 2001-2010 3000-3007 4000-4013
 42 Tract: 003200 Blocks: 2000-2002 2012-2013
 43 Tract: 003807 Blocks: 1000-1001 1011 1016-1017 2000-2005
 44 Tract: 004602 Blocks: 3001-3006
 45 Tract: 004702 Blocks: 3007-3010
 46 Tract: 005600 Blocks: 2000-2015 3000-3009
 47 Tract: 007000 Blocks: 1000-1013 2000-2009 3000-3004 3006-3007
 48 Tract: 007900 Blocks: 1005-1012 2000-2005
 49 Tract: 008100 Blocks: 2000-2002 2009-2023
 50 Tract: 008200 Blocks: 1018-1019 1021-1022 2004 2008-2009 3000-3010
 51 Tract: 008301 Blocks: 1035-1036 1043-1044 2002 2014-2016
 52 Tract: 009302 Blocks: 1000-1005
 53 Tract: 009402 Blocks: 1000-1056 1059-1061
 54 138. Assembly District 138.
 55 Within Monroe County
 56 All of Chili town

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A. 9040--A

1 All of Henrietta town
 2 All of Riga town
 3 Within Rochester city:
 4 Tract: 002900
 5 Tract: 003000
 6 Tract: 003101
 7 Tract: 003102
 8 Tract: 003300
 9 Tract: 003400
 10 Tract: 003500
 11 Tract: 003600
 12 Tract: 003700
 13 Tract: 003806
 14 Tract: 005400
 15 Tract: 005700
 16 Tract: 005800
 17 Tract: 005900
 18 Tract: 007801
 19 Tract: 014602
 20 Tract: 001000 Blocks: 1000-1011 2000-2003 3000-3002 3004-3005
 21 3007-3013
 22 Tract: 003200 Blocks: 1000-1016 2003-2011 2014-2016
 23 Tract: 003807 Blocks: 1002-1010 1012-1015 1018-1032 3000-3020
 24 3022-3024 3028
 25 Tract: 005600 Blocks: 1000-1004
 26 Tract: 006000 Blocks: 1000-1006 2000-2008 3004 3009 4003-4011
 27 Tract: 007000 Blocks: 3005
 28 Tract: 007600 Blocks: 2006-2014 3004-3008
 29 Tract: 007700 Blocks: 3006-3007
 30 Tract: 007802 Blocks: 1008 1010-1029 2000-2024
 31 Tract: 009302 Blocks: 1006-1030
 32 Tract: 009402 Blocks: 1057-1058
 33 Tract: 011100 Blocks: 2005-2006 2012-2013 2017 2022-2023 2029-2030
 34 2038
 35 Tract: 980000 Blocks: 1002-1008 1014-1017
 36 139. Assembly District 139.
 37 All of Genesee County
 38 All of Orleans County
 39 Within Erie County
 40 All of Newstead town
 41 All of Tonawanda Reservation
 42 Within Monroe County
 43 All of Clarkson Town
 44 All of Hamlin town
 45 All of Sweden town
 46 140. Assembly District 140.
 47 Within Erie County
 48 All of Tonawanda city
 49 All of Tonawanda town
 50 Within Buffalo city:
 51 Tract: 004901
 52 Tract: 005000
 53 Tract: 005801
 54 Within Niagara County
 55 Within North Tonawanda city:
 56 Tract: 023301

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A. 9040--A

1 Tract: 023302
2 Within Erie County
3 Within Buffalo city:
4 Tract: 004800 Blocks: 1006-1007
5 Tract: 004902 Blocks: 3001-3005
6 Tract: 005100 Blocks: 3004 4002-4003
7 Tract: 005300 Blocks: 1000-1005 1014-1015 2000-2002
8 Tract: 005400 Blocks: 1000-1011 2000-2006 3000-3005 4000-4005
9 Tract: 005500 Blocks: 1000-1006 2000-2003 4000-4003
10 Tract: 005600 Blocks: 1000-1006 2000-2001 2004-2009 3000-3008
11 4000-4002 5000-5005
12 Tract: 005802 Blocks: 2000-2001
13 Within Niagara County
14 Within North Tonawanda city:
15 Tract: 022803 Blocks: 2000 2004-2026
16 Tract: 022804 Blocks: 1000-1025 2012-2020
17 Tract: 022901 Blocks: 1000-1016 2013 2015-2021
18 Tract: 023001 Blocks: 1000-1033
19 Tract: 023100 Blocks: 1000-1011 2000-2021 2025-2036
20 Tract: 023200 Blocks: 1000-1026 2000-2017 3001 3003-3033
21 Tract: 024600 Blocks: 1006 1010-1014 3000-3021
22 141. Assembly District 141.
23 Within Erie County
24 Within Buffalo city:
25 Tract: 001403
26 Tract: 001404
27 Tract: 001500
28 Tract: 001602
29 Tract: 002502
30 Tract: 002802
31 Tract: 002900
32 Tract: 003100
33 Tract: 003301
34 Tract: 003302
35 Tract: 003400
36 Tract: 003501
37 Tract: 003502
38 Tract: 003600
39 Tract: 003700
40 Tract: 003800
41 Tract: 003901
42 Tract: 004002
43 Tract: 004003
44 Tract: 004100
45 Tract: 004200
46 Tract: 004300
47 Tract: 004401
48 Tract: 004402
49 Tract: 004500
50 Tract: 004601
51 Tract: 004701
52 Tract: 004702
53 Tract: 005201
54 Tract: 005202
55 Tract: 016600
56 Tract: 016801

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A. 9040--A

1 Tract: 016802
 2 Tract: 017000
 3 Tract: 980500
 4 Tract: 001601 Blocks: 1000-1016 1022
 5 Tract: 001700 Blocks: 1005-1008 2000-2002 2021
 6 Tract: 002400 Block: 5017
 7 Tract: 002703 Blocks: 1001-1008
 8 Tract: 003000 Blocks: 1000-1005 2000 2002-2008 3000-3004
 9 Tract: 004800 Blocks: 1000-1005 2000-2014 3000-3013
 10 Tract: 004902 Blocks: 1000-1006 2000-2006 3000
 11 Tract: 005100 Blocks: 1000-1013 2000-2003 3000-3003 3005 4000-4001
 12 Tract: 005300 Blocks: 1006-1013 2003-2011
 13 Tract: 006602 Blocks: 3000-3001
 14 Tract: 006702 Blocks: 1000-1005 3000-3001
 15 Tract: 006801 Blocks: 1000-1008 1012-1014
 16 Tract: 016400 Blocks: 1000-1014 2000-2030 2032 3000-3024 5001-5002
 17 5005-5007 5009-5011 5013
 18 Tract: 016500 Blocks: 1000-1009 1012-1018 1022-1038 1041-1056
 19 1059-1072 1075 1079-1083 1090-1093 1098-1107 2000-2007 2014-2021
 20 2023-2026
 21 Tract: 016900 Blocks: 3000-3005 4000-4006 4009
 22 142. Assembly District 142.
 23 Within Erie County
 24 All of West Seneca town
 25 Within Buffalo city:
 26 Tract: 000200
 27 Tract: 000600
 28 Tract: 000700
 29 Tract: 000800
 30 Tract: 000900
 31 Tract: 001000
 32 Tract: 001100
 33 Tract: 001900
 34 Tract: 016300
 35 Tract: 016700
 36 Within Lackawanna city:
 37 Tract: 012300
 38 Tract: 012400
 39 Tract: 012501
 40 Tract: 012502
 41 Tract: 016200
 42 Within Orchard Park town:
 43 Tract: 013600
 44 Tract: 013701
 45 Tract: 013702
 46 Within Buffalo city:
 47 Tract: 000110 Blocks: 1000-1006 2000-2005 3000-3006 3027-3036
 48 3041-3043 3051-3054 3057
 49 Tract: 000500 Blocks: 1000-1023 1044 1055-1057 2000-2019
 50 Tract: 001700 Blocks: 1000-1004 1009-1023 2003-2020
 51 Tract: 002300 Blocks: 1004-1010 2003-2005 3000-3001 3003-3005
 52 Tract: 016400 Blocks: 1015-1017 2031 2033-2038 4000-4006 5000
 53 5003-5004 5008 5012
 54 Within Lackawanna city:
 55 Tract: 017400 Blocks: 1000 1004-1005 1012-1022 2000-2011 2013-2016
 56 4000-4003 4005-4011

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A. 9040--A

1 Within Orchard Park town:
 2 Tract: 013501 Blocks: 3000-3005 3007-3009 3018-3020
 3 Tract: 013502 Blocks: 1000-1002 1010-1014 1019 2000-2025 3000-3020
 4 143. Assembly District 143.
 5 All of Cheektowaga town
 6 Within Buffalo city:
 7 Tract: 002704
 8 Tract: 002801
 9 Within Lancaster town:
 10 Tract: 014207
 11 Tract: 014209
 12 Tract: 014300
 13 Tract: 014400
 14 Tract: 014501
 15 Tract: 014502
 16 Within Buffalo city:
 17 Tract: 001601 Blocks: 1017-1021
 18 Tract: 002300 Blocks: 1000-1003 2000-2002 3002 4000-4005
 19 Tract: 002400 Blocks: 1000-1006 2000-2006 3000-3013 4000-4010
 20 5000-5016
 21 Tract: 002703 Blocks: 1000 1009-1016
 22 Tract: 003000 Blocks: 2001 2009-2013
 23 Within Lancaster town:
 24 Tract: 014208 Blocks: 1000-1002 1004-1015 1017-1024 3006 3012-3022
 25 3029-3031
 26 144. Assembly District 144.
 27 Within Erie County
 28 All of Alden town
 29 All of Clarence town
 30 Within Niagara County
 31 All of County subdivisions not defined
 32 All of Hartland town
 33 All of Lockport city
 34 All of Lockport town
 35 All of Newfane town
 36 All of Pendleton town
 37 All of Royalton town
 38 All of Somerset town
 39 All of Tonawanda Reservation
 40 All of Wilson town
 41 Within Erie County
 42 Within Lancaster town:
 43 Tract: 014204
 44 Tract: 014206
 45 Tract: 014208 Blocks: 1003 1016 2000-2049 3000-3005 3007-3011
 46 3023-3028
 47 145. Assembly District 145.
 48 Within Erie County
 49 All of Grand Island town
 50 Within Niagara County
 51 All of Cambria town
 52 All of Lewiston town
 53 All of Niagara Falls city
 54 All of Niagara town
 55 All of Porter town
 56 All of Tuscarora Nation Reservation

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A. 9040--A

1 All of Wheatfield town
 2 Within North Tonawanda city:
 3 Tract 022902
 4 Tract: 022803 Blocks: 1000-1016 2001-2003
 5 Tract: 022804 Blocks: 2000-2011 2021-2024
 6 Tract: 022901 Blocks: 2000-2002 2004-2012 2014
 7 Tract: 023001 Blocks: 1034-1037
 8 Tract: 023100 Blocks: 2022-2024
 9 Tract: 023200 Blocks: 3000 3002
 10 Tract: 024600 Blocks: 1000-1005 1007-1009 2000-2002
 11 146. Assembly District 146.
 12 Within Erie County
 13 All of Amherst town
 14 147. Assembly District 147.
 15 Within Erie County
 16 All of Aurora town
 17 All of Boston town
 18 All of Brant town
 19 All of Colden town
 20 All of Concord town
 21 All of Eden town
 22 All of Elma town
 23 All of Evans town
 24 All of Holland town
 25 All of Marilla town
 26 All of North Collins town
 27 All of Sardinia town
 28 All of Wales town
 29 Within Wyoming County
 30 All of Arcade town
 31 All of Attica town
 32 All of Bennington town
 33 All of Castile town
 34 All of Covington town
 35 All of Eagle town
 36 All of Gainesville town
 37 All of Genesee Falls town
 38 All of Java town
 39 All of Middlebury town
 40 All of Orangeville town
 41 All of Pike town
 42 All of Sheldon town
 43 All of Warsaw town
 44 All of Wethersfield town
 45 Within Erie County
 46 Within Collins town:
 47 Tract: 017501
 48 Tract: 017502
 49 Tract: 980300
 50 Tract: 940000 Blocks: 2016-2017
 51 Within Orchard Park town:
 52 Tract: 013501 Blocks: 1000-1052 2000-2014 3006 3010-3017 3021-3029
 53 4000-4026 5000-5018
 54 Tract: 013502 Blocks: 1003-1009 1015-1018 1020 4000-4014
 55 148. Assembly District 148.
 56 All of Allegany County

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A. 9040--A

1 All of Cattaraugus County
 2 Within Steuben County
 3 All of Canisteo town
 4 All of Greenwood town
 5 All of Hartsville town
 6 All of Jasper town
 7 All of Troupsburg town
 8 All of West Union town
 9 Within Erie County
 10 Within Collins town:
 11 Tract: 940000 Blocks: 2013-2014
 12 149. Assembly District 149.
 13 Within Erie County
 14 All of County subdivisions not defined
 15 All of Hamburg town
 16 Within Buffalo city:
 17 Tract: 005700
 18 Tract: 005900
 19 Tract: 006100
 20 Tract: 006301
 21 Tract: 006302
 22 Tract: 006501
 23 Tract: 006601
 24 Tract: 006701
 25 Tract: 006802
 26 Tract: 006901
 27 Tract: 006903
 28 Tract: 006904
 29 Tract: 007000
 30 Tract: 007102
 31 Tract: 007103
 32 Tract: 007104
 33 Tract: 007202
 34 Tract: 017100
 35 Tract: 980000
 36 Tract: 000110 Blocks: 3007-3026 3037-3040 3044-3050 3055-3056
 37 Tract: 000500 Blocks: 1024-1043 1045-1054
 38 Tract: 005400 Blocks: 1012-1014 3006-3007
 39 Tract: 005500 Blocks: 2004 3000-3012 4004
 40 Tract: 005600 Blocks: 2002-2003 3009-3010 4003-4006
 41 Tract: 005802 Blocks: 1000-1006 2002-2013 3000-3004 4000-4005
 42 Tract: 006602 Blocks: 1000-1003 2000-2003
 43 Tract: 006702 Blocks: 2000-2005 4000-4002
 44 Tract: 006801 Blocks: 1009-1011 1015
 45 Tract: 016400 Blocks: 1018-1020
 46 Tract: 016500 Blocks: 1010-1011 1019-1021 1039-1040 1057-1058
 47 1073-1074 1076-1078 1084-1089 1094-1097 1108 2008-2013 2022
 48 Tract: 016900 Blocks: 1000-1004 2000-2004 4007-4008
 49 Tract: 017400 Blocks: 3013-3015
 50 Tract: 990000 Blocks: 0001-0004
 51 Within Lackawanna city:
 52 Tract: 017400 Blocks: 1001-1003 1006-1011 2012 3000-3012 3016-3021
 53 3023-3030 4004
 54 150. Assembly District 150.
 55 All of Chautauqua County
 56 Within Erie County

S. 8185--A

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A. 9040--A

1 All of Cattaraugus Reservation
 2 Within Collins town:
 3 Tract: 940000 Blocks: 2008 2012
 4 § 122. Separability of assembly districts. Each assembly district
 5 created by this title shall be deemed a separate district for the
 6 purpose of dividing the entire state into assembly districts. If one or
 7 more assembly districts created by this title are judicially found to be
 8 invalid or unenforceable for any reason, including but not limited to
 9 noncompliance with decisions and mandates of a court of competent juris-
 10 dition, only the defective district or districts and those immediately
 11 adjacent or contiguous thereto shall be reapportioned. All other
 12 districts shall be deemed to be properly created.

13 TITLE II
 14 SENATE DISTRICTS

15 Section 123. Number of senators.
 16 124. Senate districts.
 17 125. Separability of senate districts.
 18 § 123. Number of senators. The senate shall consist of sixty-three
 19 members chosen from the districts described within and apportioned among
 20 the counties on the basis of the number of inhabitants of the state
 21 based on the Federal Census of two thousand twenty, as adjusted pursuant
 22 to the provisions of part XX of chapter fifty-seven of the laws of two
 23 thousand ten, as amended.
 24 § 124. Senate districts. Notwithstanding any other provision of law to
 25 the contrary, the senate districts shall consist as follows:
 26 1. Senate District 1.
 27 Within Suffolk County
 28 All of East Hampton town
 29 All of Riverhead town
 30 All of Shelter Island town
 31 All of Shinnecock Reservation
 32 All of Southampton town
 33 All of Southold town
 34 Within Brookhaven town:
 35 Tract: 158001
 36 Tract: 158009
 37 Tract: 158010
 38 Tract: 158011
 39 Tract: 158013
 40 Tract: 158014
 41 Tract: 158015
 42 Tract: 158016
 43 Tract: 158017
 44 Tract: 158205
 45 Tract: 158206
 46 Tract: 158207
 47 Tract: 158208
 48 Tract: 158209
 49 Tract: 158304
 50 Tract: 158306
 51 Tract: 158309
 52 Tract: 158310
 53 Tract: 158315
 54 Tract: 158317

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1 Tract: 158318
2 Tract: 158319
3 Tract: 158320
4 Tract: 158322
5 Tract: 158326
6 Tract: 158327
7 Tract: 158328
8 Tract: 158329
9 Tract: 158401
10 Tract: 158402
11 Tract: 158403
12 Tract: 158407
13 Tract: 158408
14 Tract: 158409
15 Tract: 158410
16 Tract: 158411
17 Tract: 158412
18 Tract: 159700
19 Tract: 158012 Blocks: 1000-1010 1015 2000-2028 3000-3017
20 Tract: 158324 Blocks: 1000-1009 2000-2023
21 Tract: 158325 Blocks: 2000-2008 3000-3013
22 Tract: 990100 Blocks: 0038-0045 0049
23 2. Senate District 2.
24 Within Suffolk County
25 All of Smithtown town
26 Within Brookhaven town:
27 Tract: 158102
28 Tract: 158103
29 Tract: 158107
30 Tract: 158108
31 Tract: 158111
32 Tract: 158112
33 Tract: 158114
34 Tract: 158116
35 Tract: 158117
36 Tract: 158118
37 Tract: 158119
38 Tract: 158120
39 Tract: 158502
40 Tract: 158505
41 Tract: 158506
42 Tract: 158509
43 Tract: 158510
44 Tract: 158511
45 Tract: 158512
46 Tract: 158513
47 Tract: 158514
48 Tract: 158604
49 Tract: 158605
50 Tract: 158606
51 Tract: 158607
52 Tract: 158608
53 Tract: 158609
54 Tract: 158705
55 Tract: 158707
56 Tract: 158708

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A. 9040--A

- 1 Tract: 158709
- 2 Tract: 158710
- 3 Tract: 158711
- 4 Tract: 158712
- 5 Tract: 158713
- 6 Tract: 158714
- 7 Tract: 158715
- 8 Tract: 159406
- 9 Tract: 159407
- 10 Tract: 159410
- 11 Tract: 159411
- 12 Tract: 159413
- 13 Tract: 159414
- 14 Tract: 159602
- 15 Tract: 159603
- 16 Tract: 159604
- 17 Tract: 158012 Blocks: 1011-1014 1016-1017
- 18 Tract: 158324 Blocks: 2024-2032
- 19 Tract: 158325 Blocks: 1000-1004 4000-4006
- 20 Tract: 158803 Blocks: 2000 4002
- 21 Tract: 159106 Blocks: 2000-2001 2006 2008-2009 2011 2030
- 22 Tract: 159107 Block: 1001
- 23 Tract: 159108 Block: 4001
- 24 Tract: 159408 Blocks: 1000-1024
- 25 Tract: 159408 Blocks: 2000-2007 2009-2027
- 26 Tract: 159415 Blocks: 1000-1009 1011-1012 1014-2020
- 27 Tract: 159509 Blocks: 2024-2025
- 28 Tract: 159510 Blocks: 2000-2016 2020 2026 2043-2044
- 29 Tract: 159516 Block: 3076
- 30 Tract: 990100 Blocks: 0025-0027 0031
- 31 3. Senate District 3.
- 32 Within Suffolk County
- 33 All of Poospatuck Reservation
- 34 Within Brookhaven town:
- 35 Tract: 158802
- 36 Tract: 158805
- 37 Tract: 158806
- 38 Tract: 158901
- 39 Tract: 158902
- 40 Tract: 159000
- 41 Tract: 159103
- 42 Tract: 159109
- 43 Tract: 159110
- 44 Tract: 159111
- 45 Tract: 159112
- 46 Tract: 159201
- 47 Tract: 159203
- 48 Tract: 159204
- 49 Tract: 159300
- 50 Tract: 159416
- 51 Tract: 159512
- 52 Tract: 159513
- 53 Tract: 159514
- 54 Tract: 159515
- 55 Tract: 159517
- 56 Tract: 159518

S. 8185--A 111 A. 9040--A

- 1 Within Islip town:
- 2 Tract: 145601
- 3 Tract: 145602
- 4 Tract: 145603
- 5 Tract: 145604
- 6 Tract: 145605
- 7 Tract: 145701
- 8 Tract: 145702
- 9 Tract: 145703
- 10 Tract: 145705
- 11 Tract: 145706
- 12 Tract: 145804
- 13 Tract: 145807
- 14 Tract: 145808
- 15 Tract: 145809
- 16 Tract: 145810
- 17 Tract: 145901
- 18 Tract: 145903
- 19 Tract: 145904
- 20 Tract: 145905
- 21 Tract: 146001
- 22 Tract: 146002
- 23 Tract: 146004
- 24 Tract: 146102
- 25 Tract: 146105
- 26 Tract: 146106
- 27 Tract: 146201
- 28 Tract: 146202
- 29 Tract: 146203
- 30 Tract: 146204
- 31 Tract: 146403
- 32 Tract: 146404
- 33 Tract: 146611
- 34 Tract: 146614
- 35 Tract: 146703
- 36 Tract: 201200
- 37 Within Brookhaven town:
- 38 Tract: 158803 Blocks: 1000-1024 2001-2005 3000-3007 4000-4001
- 39 4003-4019
- 40 Tract: 159106 Blocks: 1000-1020 2002-2005 2007 2010 2012-2029
- 41 2031-2032 3000-3011 4000-4022
- 42 Tract: 159107 Blocks: 1000 1002-1018 2000-2029
- 43 Tract: 159108 Blocks: 1000-1040 2000-2014 3000-3006 4000 4002-4021
- 44 Tract: 159408 Block: 2008
- 45 Tract: 159415 Blocks: 1010 1013
- 46 Tract: 159509 Blocks: 1000-1028 2000-2023 2026-2065 3000-3033
- 47 Tract: 159510 Blocks: 1000-1084 2017-2019 2021-2025 2027-2042
- 48 2045-2055
- 49 Tract: 159511 Blocks: 1000-1031 2000-2014 2016 2021-2026 3000-3025
- 50 4000-4020
- 51 Tract: 159516 Blocks: 1000-1054 2000-2055 3000-3075 3077-3082
- 52 Tract: 990100 Block: 0028
- 53 Within Islip town:
- 54 Tract: 145803 Blocks: 1000-1007 2000-2014 3000-3008 3011-3014
- 55 Tract: 146005 Blocks: 1002 1004-1007 1017-1018 1022-1040 1043-1045
- 56 1047 2000-2026 3000-3026

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1 Tract: 146206 Blocks: 1000-1012
 2 Tract: 146300 Blocks: 1000-1015 2000-2036 2038-2039
 3 Tract: 146402 Block: 1003
 4 Tract: 146612 Blocks: 1000-1015 2000-2017 2019-2024 2026 2028 2031
 5 Tract: 146613 Blocks: 1000-1024 1026
 6 Tract: 146618 Blocks: 1000-1010 2000-2018 3000-3029 4000-4020 4024-
 7 4030 4032-4035
 8 Tract: 146706 Blocks: 2017-2033
 9 Tract: 147003 Block: 1000
 10 Tract: 147100 Blocks: 1003 1006-1009 1022-1024
 11 Tract: 147201 Blocks: 2000-2002
 12 Tract: 147202 Blocks: 1000-1022 1024-1033 2000-2012
 13 Tract: 147301 Blocks: 1004-1031 1043-1044 2000-2022
 14 Tract: 147302 Blocks: 2000-2002 2009 3000-3006
 15 4. Senate District 4.
 16 Within Nassau County
 17 Within Oyster Bay town:
 18 Tract: 520700
 19 Tract: 520900
 20 Tract: 521000
 21 Tract: 521100
 22 Tract: 521200
 23 Tract: 521301
 24 Tract: 521302
 25 Tract: 521400
 26 Tract: 521500
 27 Tract: 521601
 28 Tract: 521602
 29 Tract: 521700
 30 Tract: 521802
 31 Tract: 521902
 32 Tract: 990302
 33 Tract: 520502 Blocks: 3001 3004-3009 3017-3023 4010-4021
 34 Tract: 520800 Blocks: 1000-1005 1007-1014 2000-2011 3000-3005
 35 3007-3013 4000-4010
 36 Tract: 521801 Blocks: 1003 1006-1010 1012-1018 2000-2014 3000-3018
 37 4000-4013
 38 Tract: 522000 Blocks: 2000-2020 3001-3003 4011-4018 5027-5028
 39 Within Suffolk County
 40 Within Babylon town:
 41 Tract: 122901
 42 Tract: 122902
 43 Tract: 123001
 44 Tract: 123002
 45 Tract: 123101
 46 Tract: 123102
 47 Tract: 123404
 48 Tract: 123600
 49 Tract: 123801
 50 Tract: 123802
 51 Tract: 124001
 52 Tract: 124002
 53 Tract: 124101
 54 Tract: 124102
 55 Tract: 124200
 56 Tract: 124301

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1 Tract: 124302
 2 Tract: 124401
 3 Tract: 124402
 4 Tract: 124500
 5 Tract: 124601
 6 Tract: 124602
 7 Within Islip town:
 8 Tract: 146103
 9 Tract: 146205
 10 Tract: 146500
 11 Tract: 146607
 12 Tract: 146608
 13 Tract: 146616
 14 Tract: 146617
 15 Tract: 146619
 16 Tract: 146620
 17 Tract: 146704
 18 Tract: 146705
 19 Tract: 146800
 20 Tract: 146901
 21 Tract: 146902
 22 Tract: 147001
 23 Tract: 147004
 24 Tract: 147401
 25 Tract: 147402
 26 Tract: 147502
 27 Tract: 147503
 28 Tract: 147504
 29 Tract: 147505
 30 Tract: 147601
 31 Tract: 147602
 32 Tract: 147701
 33 Tract: 147702
 34 Tract: 147802
 35 Tract: 147803
 36 Tract: 147804
 37 Tract: 147901
 38 Tract: 147902
 39 Within Babylon town:
 40 Tract: 122408 Blocks: 1036-1037 1039-1046
 41 Tract: 122802 Blocks: 2000-2021
 42 Tract: 123401 Blocks: 3000-3029
 43 Tract: 123403 Blocks: 2000 2002 2018-2021 2022-2024
 44 Tract: 123900 Blocks: 1000-1035 2000-2026 3000-3005 3012-3025
 45 3029-3045
 46 Tract: 990100 Block: 0030
 47 Within Islip town:
 48 Tract: 146005 Blocks: 1000-1002 1003 1008-1016 1019-1021 1041 1042
 49 1046
 50 Tract: 146206 Blocks: 2000-2031
 51 Tract: 146300 Block: 2037
 52 Tract: 146402 Blocks: 1000-1002 1004-1034 2000-2008 3000-3012
 53 Tract: 146612 Blocks: 2018 2025 2027 2029-2030 3000-3017
 54 Tract: 146613 Blocks: 1025 2000-2028
 55 Tract: 146618 Blocks: 4021-4023 4031
 56 Tract: 146706 Blocks: 1000-1020 2000-2016 2034

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A. 9040--A

1 Tract: 147003 Blocks: 1001-1041 2000-2029 3000-3014
 2 Tract: 147100 Blocks: 1000-1002 1004-1005 1010-1021 1025-1043
 3 2000-2033 3000-3053
 4 Tract: 147201 Blocks: 1000-1017 2003-2014 3000-3016 4000-4005
 5 Tract: 147202 Block: 1023
 6 Tract: 147301 Blocks: 1000-1003 1032-1042
 7 Tract: 147302 Blocks: 1000-1011 2003-2008 2010-2022 3007-3016
 8 4000-4014
 9 Tract: 990100 Block: 0029
 10 5. Senate District 5.
 11 Within Suffolk County
 12 All of Huntington town
 13 Within Babylon town:
 14 Tract: 122300
 15 Tract: 122405
 16 Tract: 122406
 17 Tract: 122407
 18 Tract: 122501
 19 Tract: 122502
 20 Tract: 122602
 21 Tract: 122603
 22 Tract: 122604
 23 Tract: 122605
 24 Tract: 122704
 25 Tract: 122705
 26 Tract: 122706
 27 Tract: 122707
 28 Tract: 122801
 29 Tract: 123201
 30 Tract: 123203
 31 Tract: 123204
 32 Tract: 123303
 33 Tract: 123304
 34 Tract: 123500
 35 Tract: 123701
 36 Tract: 123703
 37 Tract: 123704
 38 Tract: 122408 Blocks: 1000-1035 1038 2000-2029 3000-3029
 39 Tract: 122802 Blocks: 1000-1033
 40 Tract: 123401 Blocks: 1000-1011 2000-2025
 41 Tract: 123403 Blocks: 1000-1019 2001 2003-2017 2022
 42 Tract: 123900 Blocks: 3006-3011 3026-3028
 43 6. Senate District 6.
 44 Within Nassau County
 45 All of Glen Cove city
 46 Within Hempstead town:
 47 Tract: 406701
 48 Tract: 406702
 49 Tract: 406801
 50 Tract: 406802
 51 Tract: 406900
 52 Tract: 407000
 53 Tract: 407102
 54 Tract: 407201
 55 Tract: 407203
 56 Tract: 407204

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1 Tract: 407301
 2 Tract: 407302
 3 Tract: 407600
 4 Tract: 407700
 5 Tract: 407801
 6 Tract: 407802
 7 Tract: 408200
 8 Tract: 408300
 9 Tract: 408600
 10 Tract: 408700
 11 Tract: 408900
 12 Tract: 409100
 13 Tract: 409200
 14 Within Oyster Bay town:
 15 Tract: 517400
 16 Tract: 517801
 17 Tract: 517802
 18 Tract: 517901
 19 Tract: 517902
 20 Tract: 518000
 21 Tract: 518100
 22 Tract: 518201
 23 Tract: 518203
 24 Tract: 518300
 25 Tract: 518400
 26 Tract: 518502
 27 Tract: 518600
 28 Tract: 518700
 29 Tract: 518900
 30 Tract: 519000
 31 Tract: 519100
 32 Tract: 519200
 33 Tract: 519300
 34 Tract: 519400
 35 Tract: 519500
 36 Tract: 990301
 37 Within Hempstead town:
 38 Tract: 406400 Blocks: 4018-4019
 39 Tract: 406501 Blocks: 1000-1021 2000-2020 4000-4011 4014-4033
 40 5011-5012 5016
 41 Tract: 406600 Blocks: 1000-1018 2000-2003 2011-2016 3000-3001
 42 3010-3012 4000-4004 4006-4010 4013 4015-4033
 43 Tract: 407101 Blocks: 1000-1016 2000-2012 3000-3014 4000-4027
 44 4029-4030
 45 Tract: 407900 Blocks: 3000-3011
 46 Tract: 408000 Blocks: 1000-1010 2000-2013 3000-3014 5003 6000-6011
 47 Tract: 408100 Blocks: 2000-2009
 48 Tract: 408800 Blocks: 1005-1013 2000-2015 3000-3010 4000-4009
 49 5000-5017 6002-6012 6014-6015 6019-6021
 50 Tract: 409000 Blocks: 1000-1013 4000-4014 5000-5010
 51 Tract: 409300 Blocks: 1000-1010 2000-2011 3000-3001 3003-3008 4002
 52 Tract: 412800 Block: 1004
 53 Within Oyster Bay town:
 54 Tract: 517500 Blocks: 1000-1025 1028-1033 2000-2025 3000-3024
 55 Tract: 517600 Blocks: 1000-1019 2000-2027 3000-3016 4000-4013

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1 Tract: 517701 Blocks: 1000-1025 1030 2000-2035 3000 3009 3018 3020
 2 4000-4015 4022 4025
 3 Tract: 518204 Blocks: 1000-1013 2000-2017 2020-2021 3000-3014 3017
 4 Tract: 518501 Blocks: 1000-1018 1021-1033 2000-2025 2029-2046
 5 3000-3024
 6 Tract: 518800 Blocks: 2004-2018 2025 2027
 7 Tract: 519702 Blocks: 1000-1024 1036 4000-4005
 8 Tract: 520001 Blocks: 1022 1031-1033 1035-1044
 9 Tract: 982100 Blocks: 1001 1003 1010
 10 7. Senate District 7.
 11 Within Nassau County
 12 All of North Hempstead town:
 13 Tract: 404300
 14 Tract: 404400
 15 Tract: 404600
 16 Tract: 404800
 17 Tract: 404901
 18 Tract: 404902
 19 Tract: 405000
 20 Tract: 405100
 21 Tract: 405200
 22 Tract: 406300
 23 Within Hempstead town:
 24 Tract: 980100
 25 Within Oyster Bay town:
 26 Tract: 517705
 27 Tract: 981100
 28 Within Hempstead town:
 29 Tract: 404500 Blocks: 1000-1008 2000-2009 3000-3014 4000-4012
 30 5000-5012
 31 Tract: 404700 Blocks: 1000-1030 2000-2017 4000-4005 4007-4013
 32 4016-4019 6000-6021
 33 Tract: 406400 Blocks: 1000-1015 2000-2023 3000-3021 4000-4017 4020
 34 5000-5025 6000-6020 7000-7019
 35 Tract: 406501 Blocks: 3000-3035 4012-4013 5000-5010 5013-5015
 36 6000-6019
 37 Tract: 406600 Blocks: 2004-2010 2017-2018 3002-3009 3013-3014 4005
 38 4011-4012 4014
 39 Within Oyster Bay town:
 40 Tract: 517500 Blocks: 1026-1027
 41 Tract: 517600 Blocks: 3017-3018
 42 Tract: 517701 Blocks: 1026-1029 1031-1032 3001-3008 3010-3017 3019
 43 3021-3036 4016-4021 4023-4024
 44 Tract: 518501 Blocks: 1019-1020 2026-2028 2047-2048
 45 Tract: 982100 Blocks: 1000 1002 1004-1009 1011
 46 8. Senate District 8.
 47 Within Nassau County
 48 Within Hempstead town:
 49 Tract: 407401
 50 Tract: 407402
 51 Tract: 407501
 52 Tract: 407502
 53 Tract: 408400
 54 Tract: 408500
 55 Tract: 409400
 56 Tract: 409500

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1 Tract: 409600
 2 Tract: 409700
 3 Tract: 413900
 4 Tract: 414001
 5 Tract: 414002
 6 Tract: 414100
 7 Tract: 414201
 8 Tract: 414202
 9 Tract: 414301
 10 Tract: 414303
 11 Tract: 414304
 12 Tract: 414400
 13 Tract: 414501
 14 Tract: 414502
 15 Tract: 414600
 16 Tract: 414700
 17 Tract: 414800
 18 Tract: 414900
 19 Tract: 415000
 20 Tract: 415101
 21 Tract: 415102
 22 Tract: 415201
 23 Tract: 415202
 24 Tract: 415300
 25 Tract: 415401
 26 Tract: 415402
 27 Tract: 415500
 28 Tract: 415600
 29 Tract: 415700
 30 Tract: 415802
 31 Tract: 416000
 32 Tract: 416100
 33 Tract: 522700
 34 Within Oyster Bay town:
 35 Tract: 519601
 36 Tract: 519602
 37 Tract: 519703
 38 Tract: 519704
 39 Tract: 519801
 40 Tract: 519802
 41 Tract: 519900
 42 Tract: 520002
 43 Tract: 520100
 44 Tract: 520200
 45 Tract: 520300
 46 Tract: 520401
 47 Tract: 520402
 48 Tract: 520501
 49 Tract: 520600
 50 Within Hempstead town:
 51 Tract: 407900 Blocks: 1000-1019 2000-2012 3012-3014 4000-4008
 52 Tract: 408000 Blocks: 2014-2019 4000-4013 5000-5002 5004-5010
 53 Tract: 408100 Blocks: 1000-1011 3000-3007 4000-4008 5000-5009
 54 6000-6010
 55 Tract: 408800 Blocks: 1000-1004 6000-6001 6013 6016-6018 6022-6029
 56 Tract: 409000 Blocks: 2000-2017 3000-3012

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A. 9040--A

1 Tract: 409300 Blocks: 3002 4000-4001 4003-4014
 2 Tract: 412900 Blocks: 1000-1013 2000-2020 3000-3027
 3 Tract: 413500 Blocks: 2000-2002 3000-3015 3017 3021 3024-3025 4000
 4 4005
 5 Tract: 413600 Blocks: 2012 2014
 6 Tract: 413804 Block: 2001
 7 Tract: 416900 Blocks: 1000-1048 1054-1062 1084-1117
 8 Tract: 990400 Blocks: 0001-0005
 9 Within Oyster Bay town:
 10 Tract: 518204 Blocks: 2018-2019 2022-2026 3015-3016
 11 Tract: 518800 Blocks: 1000-1014 2000-2003 2019-2024 2026 3000-3012
 12 Tract: 519702 Blocks: 1025-1035 2000-2010 3000-3017 4006-4022
 13 Tract: 520001 Blocks: 1000-1021 1023-1030 1034 1045-1047 2000-2019
 14 3000-3018 4000-4027 5000-5023
 15 Tract: 520502 Blocks: 1000-1017 2000-2015 3000 3002-3003 3010-3016
 16 4000-4009 5000-5010
 17 Tract: 520800 Blocks: 1006 3006
 18 Tract: 521801 Blocks: 1000-1002 1004-1005 1011 1019
 19 Tract: 522000 Blocks: 1000-1025 3000 3004-3028 4000-4010 5000-5026
 20 5029-5031
 21 9. Senate District 9.
 22 Within Nassau County
 23 All of Long Beach city
 24 Within Hempstead town:
 25 Tract: 405301
 26 Tract: 405302
 27 Tract: 405400
 28 Tract: 405500
 29 Tract: 405600
 30 Tract: 405700
 31 Tract: 405800
 32 Tract: 405900
 33 Tract: 406001
 34 Tract: 406002
 35 Tract: 406100
 36 Tract: 406201
 37 Tract: 406202
 38 Tract: 409800
 39 Tract: 409900
 40 Tract: 410000
 41 Tract: 410100
 42 Tract: 410200
 43 Tract: 410300
 44 Tract: 410400
 45 Tract: 410500
 46 Tract: 410600
 47 Tract: 410700
 48 Tract: 410800
 49 Tract: 411800
 50 Tract: 411901
 51 Tract: 411902
 52 Tract: 412000
 53 Tract: 412100
 54 Tract: 412200
 55 Tract: 412301
 56 Tract: 412302

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 2 Tract: 412500
 3 Tract: 412600
 4 Tract: 412700
 5 Tract: 413001
 6 Tract: 413002
 7 Tract: 413100
 8 Tract: 413200
 9 Tract: 413300
 10 Tract: 413400
 11 Tract: 413700
 12 Tract: 413803
 13 Tract: 416202
 14 Tract: 416300
 15 Tract: 404500 Block: 2010
 16 Tract: 404700 Blocks: 3000-3018 4006 4014-4015 5000-5009
 17 Tract: 407101 Block: 4028
 18 Tract: 410900 Blocks: 1000-1007 2000-2016 3000-3010 4000-4016
 19 4018-4019
 20 Tract: 411301 Blocks: 3000-3007 3013-3016
 21 Tract: 411500 Blocks: 1000-1024 2000-2031
 22 Tract: 411700 Blocks: 2000-2027 3000-3010 3012-3015 4000-4014
 23 5000-5015
 24 Tract: 412800 Blocks: 1000-1003 1005-1040 2000-2020 3000-3012
 25 Tract: 412900 Blocks: 4000-4020
 26 Tract: 413500 Blocks: 1000-1011 2003-2010 3016 3018-3020 3022-3023
 27 4001-4004 4006-4009 5000-5014 6000-6009
 28 Tract: 413600 Blocks: 1000-1012 2000-2011 2013 2015-2016 3000-3015
 29 4000-4023 5000-5013
 30 Tract: 413804 Blocks: 1000-1016 2000 2002-2014 3000-3016
 31 Tract: 416201 Blocks: 1000-1002 1004-1038 2000-2027 3000-3017
 32 Tract: 416900 Blocks: 1049-1053 1063-1083 2000-2032 3000-3026
 33 Tract: 990400 Blocks: 0006-0007
 34 10. Senate District 10.
 35 Within Nassau County
 36 Within Hempstead town:
 37 Tract: 411000
 38 Tract: 411100
 39 Tract: 411200
 40 Tract: 411302
 41 Tract: 411400
 42 Tract: 411600
 43 Tract: 410900 Block: 4017
 44 Tract: 411301 Blocks: 1000-1026 2000-2014 3008-3012
 45 Tract: 411500 Blocks: 1025-1033 3000-3030
 46 Tract: 411700 Blocks: 1000-1018 3011 3014 3016-3021
 47 Tract: 416201 Block: 1003
 48 Within Queens County
 49 Within Queens Borough:
 50 Tract: 018200
 51 Tract: 018401
 52 Tract: 018402
 53 Tract: 018600
 54 Tract: 018800
 55 Tract: 019000
 56 Tract: 019200

S. 8185--A

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A. 9040--A

- 1 Tract: 019400
- 2 Tract: 019600
- 3 Tract: 019800
- 4 Tract: 020200
- 5 Tract: 020400
- 6 Tract: 020600
- 7 Tract: 020800
- 8 Tract: 021200
- 9 Tract: 024000
- 10 Tract: 025401
- 11 Tract: 026000
- 12 Tract: 026200
- 13 Tract: 027000
- 14 Tract: 027200
- 15 Tract: 027400
- 16 Tract: 028400
- 17 Tract: 028801
- 18 Tract: 028802
- 19 Tract: 028803
- 20 Tract: 029400
- 21 Tract: 030600
- 22 Tract: 032000
- 23 Tract: 033401
- 24 Tract: 033403
- 25 Tract: 033404
- 26 Tract: 033405
- 27 Tract: 065402
- 28 Tract: 066000
- 29 Tract: 066401
- 30 Tract: 066402
- 31 Tract: 066403
- 32 Tract: 066404
- 33 Tract: 069000
- 34 Tract: 069400
- 35 Tract: 078800
- 36 Tract: 079000
- 37 Tract: 079200
- 38 Tract: 081400
- 39 Tract: 095400
- 40 Tract: 096400
- 41 Tract: 097202
- 42 Tract: 097204
- 43 Tract: 097205
- 44 Tract: 097206
- 45 Tract: 097207
- 46 Tract: 099200
- 47 Tract: 099801
- 48 Tract: 099802
- 49 Tract: 100801
- 50 Tract: 100803
- 51 Tract: 100804
- 52 Tract: 101002
- 53 Tract: 101003
- 54 Tract: 101004
- 55 Tract: 103201
- 56 Tract: 103202

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S. 8185--A

121

A. 9040--A

1 Tract: 014202 Block: 2006
 2 Tract: 015200 Blocks: 1000 2000
 3 Tract: 015801 Block: 1000
 4 Tract: 017200 Blocks: 2000-2004 2007
 5 Tract: 017400 Blocks: 1000-1006 2000
 6 Tract: 017600 Blocks: 2000-2006
 7 Tract: 017800 Blocks: 1000 2000-2006
 8 Tract: 018000 Blocks: 1000-1006 1008-1011
 9 Tract: 021400 Block: 3015
 10 Tract: 025402 Blocks: 2002-2006 3000-3004
 11 Tract: 026400 Blocks: 2004-2007
 12 Tract: 027600 Blocks: 1002-1010
 13 Tract: 027800 Block: 2001
 14 Tract: 028200 Blocks: 1002-1011
 15 Tract: 032800 Blocks: 2001-2002 2004-2005
 16 Tract: 033000 Blocks: 1000-1001 1003-1008 1010-1013 2000-2004 2006
 17 3000-3013 4000-4006 5000-5007
 18 Tract: 035200 Blocks: 2001-2002 2004-2012
 19 Tract: 044601 Blocks: 1001-1004
 20 Tract: 065401 Blocks: 1003-1012 2000-2009 3002-3010
 21 Tract: 065600 Blocks: 1002-1013 2000-2011 3000-3017
 22 Tract: 068000 Blocks: 1008-1015 2000-2011 3000-3013 4001-4006
 23 4008-4016
 24 Tract: 071600 Blocks: 1000-1009 1011-1031
 25 Tract: 081800 Blocks: 1000-1005 2000-2003 2007-2008 3001
 26 Tract: 084602 Blocks: 1000 1004-1006 1014-1016 1018-1019
 27 Tract: 094201 Block: 2000
 28 Tract: 094202 Blocks: 0001-0004 1000-1019 1021 2000-2005 3000-3018
 29 Tract: 094203 Blocks: 0001 1000-1008 1010-1013 2000-2001 3000 4000
 30 5000
 31 Tract: 107202 Blocks: 0001-0005 0008-0010 0012 0017-0018 1000-1001
 32 1004-1005 1007-1009
 33 Tract: 990100 Block: 0001
 34 11. Senate District 11.
 35 Within Queens County
 36 Within Queens Borough:
 37 Tract: 079701
 38 Tract: 084500
 39 Tract: 084902
 40 Tract: 085300
 41 Tract: 085500
 42 Tract: 085700
 43 Tract: 085900
 44 Tract: 086100
 45 Tract: 086300
 46 Tract: 086500
 47 Tract: 088902
 48 Tract: 099703
 49 Tract: 099705
 50 Tract: 099900
 51 Tract: 109300
 52 Tract: 109700
 53 Tract: 111300
 54 Tract: 112300
 55 Tract: 112900
 56 Tract: 113300

S. 8185--A

122

A. 9040--A

- 1 [Tract: 115100](#)
- 2 [Tract: 115500](#)
- 3 [Tract: 115700](#)
- 4 [Tract: 115900](#)
- 5 [Tract: 116100](#)
- 6 [Tract: 116301](#)
- 7 [Tract: 116302](#)
- 8 [Tract: 116700](#)
- 9 [Tract: 117100](#)
- 10 [Tract: 117500](#)
- 11 [Tract: 118100](#)
- 12 [Tract: 118500](#)
- 13 [Tract: 118700](#)
- 14 [Tract: 118900](#)
- 15 [Tract: 119100](#)
- 16 [Tract: 119300](#)
- 17 [Tract: 119500](#)
- 18 [Tract: 119900](#)
- 19 [Tract: 120100](#)
- 20 [Tract: 120300](#)
- 21 [Tract: 120500](#)
- 22 [Tract: 120701](#)
- 23 [Tract: 120702](#)
- 24 [Tract: 121100](#)
- 25 [Tract: 121500](#)
- 26 [Tract: 136700](#)
- 27 [Tract: 137700](#)
- 28 [Tract: 138501](#)
- 29 [Tract: 139900](#)
- 30 [Tract: 140901](#)
- 31 [Tract: 140902](#)
- 32 [Tract: 141700](#)
- 33 [Tract: 142900](#)
- 34 [Tract: 143500](#)
- 35 [Tract: 144100](#)
- 36 [Tract: 144700](#)
- 37 [Tract: 145101](#)
- 38 [Tract: 145102](#)
- 39 [Tract: 145900](#)
- 40 [Tract: 146300](#)
- 41 [Tract: 146700](#)
- 42 [Tract: 147100](#)
- 43 [Tract: 147900](#)
- 44 [Tract: 148300](#)
- 45 [Tract: 150701](#)
- 46 [Tract: 150702](#)
- 47 [Tract: 152902](#)
- 48 [Tract: 155101](#)
- 49 [Tract: 155103](#)
- 50 [Tract: 155104](#)
- 51 [Tract: 157101](#)
- 52 [Tract: 157901](#)
- 53 [Tract: 157902](#)
- 54 [Tract: 157903](#)
- 55 [Tract: 161700](#)
- 56 [Tract: 079702 Block: 2000](#)

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S. 8185--A

123

A. 9040--A

1 Tract: 079900 Block: 1004
 2 Tract: 083700 Blocks: 1000-1009 1012-1014 1016 2000-2005 3000-3006
 3 4000 5000-5008
 4 Tract: 086900 Blocks: 1000-1004 1009-1012 2010 2012-2015
 5 Tract: 087100 Blocks: 2000-2005 2011-2015
 6 Tract: 088903 Blocks: 1005 1011-1012 2000-2005 3000-3003
 7 Tract: 098700 Block: 0001
 8 Tract: 099100 Block: 0001
 9 Tract: 099704 Blocks: 1000-1002 2000-2001 3000-3002 4000 5000-5001
 10 Tract: 103300 Blocks: 3008 4007-4008
 11 Tract: 104700 Blocks: 1003-1004 1006-1008 2000-2012 3000-3010
 12 4000-4002 5006-5012
 13 Tract: 105900 Blocks: 1000-1011 2000-2010 3000-3011 4000-4002
 14 4004-4007 4009-4015
 15 Tract: 109900 Blocks: 1006-1011 2000-2009 3005-3008
 16 Tract: 113900 Blocks: 1002-1010 2000-2010 3000-3009
 17 Tract: 114100 Blocks: 1008 2000-2011
 18 Tract: 114700 Blocks: 1002-1006 2000-2011
 19 Tract: 128300 Blocks: 1000 1006
 20 Tract: 129103 Blocks: 1000-1003 2000-2001
 21 Tract: 129104 Blocks: 1000-1004 3000 5000-5002
 22 Tract: 138502 Blocks: 1000-1027
 23 Tract: 140300 Blocks: 1000-1011 2000-2011
 24 Tract: 152901 Blocks: 1000-1017 1019 2000-2008 3000-3008
 25 Tract: 156700 Blocks: 1000-1004
 26 12. Senate District 12.
 27 Within New York County
 28 Within Manhattan Borough:
 29 Tract: 015403
 30 Tract: 015601
 31 Tract: 015602
 32 Tract: 015801
 33 Tract: 015802
 34 Tract: 016001
 35 Tract: 016002
 36 Tract: 023802
 37 Tract: 023803
 38 Tract: 023804
 39 Tract: 024000
 40 Tract: 008602 Block: 0001
 41 Tract: 008603 Block: 0001
 42 Tract: 010601 Block: 0001
 43 Tract: 010602 Blocks: 0001-0002
 44 Tract: 011600 Block: 0001
 45 Tract: 012400 Block: 0001
 46 Tract: 013201 Block: 0001
 47 Tract: 013601 Blocks: 0001 1000
 48 Tract: 014402 Blocks: 7000-7002
 49 Tract: 014802 Blocks: 1000-1001 4000-4001
 50 Tract: 015002 Blocks: 1000-1001 4000
 51 Tract: 015200 Blocks: 0001 1000 2000 3000 6000-6003 7000
 52 Tract: 015402 Blocks: 2000 3000
 53 Tract: 016200 Blocks: 0001-0003 5002-5008
 54 Tract: 016800 Blocks: 2000-2003
 55 Tract: 017800 Block: 0001
 56 Tract: 019200 Blocks: 0001-0003

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124

A. 9040--A

1 Within Queens County
2 Within Queens Borough:
3 Tract: 002500
4 Tract: 003100
5 Tract: 003301
6 Tract: 003302
7 Tract: 003700
8 Tract: 003900
9 Tract: 004300
10 Tract: 004500
11 Tract: 004700
12 Tract: 005100
13 Tract: 005300
14 Tract: 005500
15 Tract: 005700
16 Tract: 005900
17 Tract: 006100
18 Tract: 006300
19 Tract: 006501
20 Tract: 006502
21 Tract: 006900
22 Tract: 007100
23 Tract: 007300
24 Tract: 007500
25 Tract: 007700
26 Tract: 007900
27 Tract: 008100
28 Tract: 008300
29 Tract: 008500
30 Tract: 008700
31 Tract: 009100
32 Tract: 009500
33 Tract: 009700
34 Tract: 009900
35 Tract: 010500
36 Tract: 012500
37 Tract: 013500
38 Tract: 013700
39 Tract: 014100
40 Tract: 014300
41 Tract: 014500
42 Tract: 014700
43 Tract: 014900
44 Tract: 015100
45 Tract: 015500
46 Tract: 015700
47 Tract: 015900
48 Tract: 016900
49 Tract: 017102
50 Tract: 017901
51 Tract: 018101
52 Tract: 018102
53 Tract: 018300
54 Tract: 018501
55 Tract: 018502
56 Tract: 024900

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S. 8185--A

125

A. 9040--A

1 Tract: 025100
 2 Tract: 026100
 3 Tract: 029900
 4 Tract: 030905
 5 Tract: 030906
 6 Tract: 001903 Block: 1004
 7 Tract: 010100 Blocks: 1000-1007 2000 2004-2007
 8 Tract: 010300 Blocks: 1000-1004 2000-2004 3000-3001
 9 Tract: 011100 Block: 1000
 10 Tract: 011500 Blocks: 1000-1007 2005
 11 Tract: 011700 Blocks: 3000-3004 4000-4001
 12 Tract: 011900 Blocks: 2000-2002
 13 Tract: 012100 Blocks: 1000-1003
 14 Tract: 012301 Blocks: 2010 3004-3005 3007-3008
 15 Tract: 015300 Blocks: 1000-1002 1004-1005 2000-2003
 16 Tract: 016100 Blocks: 1000-1003 2002
 17 Tract: 016300 Blocks: 1000-1003
 18 Tract: 017101 Blocks: 1000-1011
 19 Tract: 017902 Blocks: 1000-1002 1008 1014-1019 1030-1032
 20 Tract: 018900 Blocks: 1000-1001 2000-2004 3004
 21 Tract: 023501 Blocks: 1000 2003
 22 Tract: 023502 Blocks: 1003-1004 2000-2003
 23 Tract: 024500 Blocks: 1000-1002
 24 Tract: 024700 Blocks: 1000-1003 1005-1006 1009-1010
 25 Tract: 025301 Blocks: 1000-1001 2000-2001 2005 3000-3003 4000-4002
 26 Tract: 025302 Blocks: 1000-1001 2000-2005 2008
 27 Tract: 025500 Blocks: 1002-1015
 28 Tract: 025700 Blocks: 1003-1009
 29 Tract: 025900 Blocks: 1003-1011 2000-2003
 30 Tract: 026300 Block: 3002
 31 Tract: 029500 Blocks: 1000-1002 2000-2002
 32 Tract: 029700 Blocks: 1000-1015 2000-2007 2009-2016
 33 Tract: 030903 Blocks: 1003-1005 2000-2006 3000-3002 4000-4003
 34 Tract: 030904 Blocks: 1008-1012 1015-1019 2001-2006
 35 Tract: 031700 Blocks: 2000-2007 3000-3005 4001-4012 4014-4017
 36 5000-5016
 37 13. Senate District 13.
 38 Within Bronx County
 39 Within Bronx Borough:
 40 Tract: 000100 Blocks: 0002 1000-1003
 41 Within Queens County
 42 Within Queens Borough:
 43 Tract: 010701
 44 Tract: 011300
 45 Tract: 026502
 46 Tract: 026901
 47 Tract: 027102
 48 Tract: 027301
 49 Tract: 027302
 50 Tract: 027500
 51 Tract: 027701
 52 Tract: 027702
 53 Tract: 027900
 54 Tract: 028100
 55 Tract: 028300
 56 Tract: 028500

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S. 8185--A

126

A. 9040--A

1 Tract: 028700
2 Tract: 028900
3 Tract: 029100
4 Tract: 029300
5 Tract: 032700
6 Tract: 032900
7 Tract: 033700
8 Tract: 033900
9 Tract: 034700
10 Tract: 035100
11 Tract: 035300
12 Tract: 035700
13 Tract: 036100
14 Tract: 036300
15 Tract: 036500
16 Tract: 036700
17 Tract: 037100
18 Tract: 037300
19 Tract: 037501
20 Tract: 037502
21 Tract: 037700
22 Tract: 037900
23 Tract: 038100
24 Tract: 039901
25 Tract: 039902
26 Tract: 040101
27 Tract: 040102
28 Tract: 040301
29 Tract: 040302
30 Tract: 040501
31 Tract: 040502
32 Tract: 040701
33 Tract: 040702
34 Tract: 040901
35 Tract: 040902
36 Tract: 041100
37 Tract: 041300
38 Tract: 041500
39 Tract: 042700
40 Tract: 043900
41 Tract: 044301
42 Tract: 045500
43 Tract: 046300
44 Tract: 046500
45 Tract: 046902
46 Tract: 048302
47 Tract: 010100 Blocks: 2001-2003
48 Tract: 010300 Blocks: 4000-4001
49 Tract: 011100 Blocks: 1001-1002 2000-2006
50 Tract: 011500 Blocks: 2000-2004
51 Tract: 011700 Blocks: 1000-1001 2000-2001
52 Tract: 011900 Blocks: 1000-1001
53 Tract: 012100 Blocks: 2000-2001
54 Tract: 012301 Blocks: 1000-1012 2000-2009 2011 3000-3003 3006
55 Tract: 015300 Block: 1003
56 Tract: 016100 Blocks: 2000-2001

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S. 8185--A

127

A. 9040--A

1 Tract: 016300 Blocks: 2000-2002 3000-3001
 2 Tract: 024700 Blocks: 1004 1007-1008 1011
 3 Tract: 025500 Blocks: 1000-1001
 4 Tract: 025700 Blocks: 1000-1002 1010
 5 Tract: 025900 Blocks: 1000-1002
 6 Tract: 026300 Blocks: 1000-1009 2000-2006 3000-3001
 7 Tract: 026501 Blocks: 1000-1001 2000-2007
 8 Tract: 026700 Blocks: 1000-1002 2000-2001 3000-3003
 9 Tract: 026902 Block: 1000
 10 Tract: 027101 Blocks: 1000-1002
 11 Tract: 029500 Blocks: 2003-2008
 12 Tract: 030903 Blocks: 1000-1002
 13 Tract: 030904 Blocks: 1000-1007 1013-1014 2000
 14 Tract: 031700 Blocks: 1000-1002 4000 4013
 15 Tract: 033100 Blocks: 0001-0004 0006 1000-1002
 16 Tract: 038301 Blocks: 0001-0002 1001-1009 1013-1025 1028
 17 Tract: 038302 Blocks: 0001 1000-1020 1022-1030 1033 1089
 18 Tract: 043701 Blocks: 1000-1002 2000 2002-2003 2005-2009
 19 Tract: 043702 Blocks: 1001-1005 2000-2003 3000-3003
 20 Tract: 044302 Blocks: 1000-1006 2000-2005 3000-3003
 21 Tract: 045700 Blocks: 1000-1002
 22 Tract: 045900 Blocks: 1000-1002 1005-1006 2000-2001
 23 Tract: 046100 Blocks: 1000-1002 1006 2000-2004
 24 Tract: 046700 Blocks: 1000-1002 2000-2001 3000-3001 4000-4001
 25 Tract: 046901 Blocks: 1000 3000-3001
 26 Tract: 047100 Blocks: 1000-1001
 27 Tract: 048301 Blocks: 1001-1003 1006
 28 Tract: 048500 Blocks: 3007-3008
 29 14. Senate District 14.
 30 Within Queens County
 31 Within Queens Borough:
 32 Tract: 022002
 33 Tract: 023000
 34 Tract: 023200
 35 Tract: 023600
 36 Tract: 023800
 37 Tract: 024600
 38 Tract: 025800
 39 Tract: 026600
 40 Tract: 028000
 41 Tract: 035800
 42 Tract: 036600
 43 Tract: 036800
 44 Tract: 037600
 45 Tract: 038400
 46 Tract: 039400
 47 Tract: 039800
 48 Tract: 040000
 49 Tract: 040200
 50 Tract: 040400
 51 Tract: 041400
 52 Tract: 042400
 53 Tract: 042600
 54 Tract: 043200
 55 Tract: 043400
 56 Tract: 044000

S. 8185--A

128

A. 9040--A

- 1 Tract: 044400
- 2 Tract: 044602
- 3 Tract: 044800
- 4 Tract: 045000
- 5 Tract: 045200
- 6 Tract: 045400
- 7 Tract: 045600
- 8 Tract: 045800
- 9 Tract: 046000
- 10 Tract: 046200
- 11 Tract: 046400
- 12 Tract: 046600
- 13 Tract: 046800
- 14 Tract: 047000
- 15 Tract: 047200
- 16 Tract: 047600
- 17 Tract: 047801
- 18 Tract: 047802
- 19 Tract: 048000
- 20 Tract: 048200
- 21 Tract: 048400
- 22 Tract: 049202
- 23 Tract: 049600
- 24 Tract: 050000
- 25 Tract: 050201
- 26 Tract: 050202
- 27 Tract: 050400
- 28 Tract: 050600
- 29 Tract: 050800
- 30 Tract: 051000
- 31 Tract: 051200
- 32 Tract: 051600
- 33 Tract: 051800
- 34 Tract: 052000
- 35 Tract: 052200
- 36 Tract: 052400
- 37 Tract: 052600
- 38 Tract: 052800
- 39 Tract: 053000
- 40 Tract: 053200
- 41 Tract: 053401
- 42 Tract: 053601
- 43 Tract: 053800
- 44 Tract: 054000
- 45 Tract: 054200
- 46 Tract: 054800
- 47 Tract: 055400
- 48 Tract: 055600
- 49 Tract: 055800
- 50 Tract: 056000
- 51 Tract: 056200
- 52 Tract: 056400
- 53 Tract: 056600
- 54 Tract: 056800
- 55 Tract: 058000
- 56 Tract: 058200

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S. 8185--A

129

A. 9040--A

1 Tract: 059000
 2 Tract: 059200
 3 Tract: 059400
 4 Tract: 059600
 5 Tract: 059800
 6 Tract: 060000
 7 Tract: 060600
 8 Tract: 060800
 9 Tract: 061000
 10 Tract: 061200
 11 Tract: 061400
 12 Tract: 061601
 13 Tract: 061602
 14 Tract: 061800
 15 Tract: 062000
 16 Tract: 062200
 17 Tract: 062400
 18 Tract: 062600
 19 Tract: 063000
 20 Tract: 063200
 21 Tract: 063800
 22 Tract: 064600
 23 Tract: 065000
 24 Tract: 068200
 25 Tract: 130100
 26 Tract: 157102
 27 Tract: 162100
 28 Tract: 021400 Blocks: 1000-1001 2000-2011 3000-3014 3016-3017
 29 Tract: 021601 Blocks: 1000-1006 2000-2001 3000
 30 Tract: 022001 Blocks: 1001-1008 2001-2009 3000-3012 4000-4002
 31 Tract: 025402 Blocks: 1000-1010 2000-2001
 32 Tract: 026400 Blocks: 1000-1008 2000-2003
 33 Tract: 027600 Blocks: 1000-1001
 34 Tract: 027800 Blocks: 1000-1005 2000
 35 Tract: 028200 Blocks: 1000-1001
 36 Tract: 032800 Blocks: 1000-1008 2000 2003 3000-3006
 37 Tract: 033000 Blocks: 1002 1009 2005
 38 Tract: 035200 Blocks: 1000-1015 2000 2003
 39 Tract: 044601 Blocks: 1000 1005 2000-2005
 40 Tract: 049201 Blocks: 1001-1007 2000-2004
 41 Tract: 055200 Blocks: 1000-1008 1010-1021 2000-2011
 42 Tract: 065401 Blocks: 1000-1002 3000-3001
 43 Tract: 065600 Blocks: 1000-1001
 44 Tract: 068000 Blocks: 1000-1007 4000 4007
 45 Tract: 077905 Blocks: 1001 1010-1012
 46 Tract: 128300 Block: 1019
 47 Tract: 138502 Block: 1025
 48 Tract: 152901 Block: 1018
 49 Tract: 156700 Blocks: 1005-1014
 50 15. Senate District 15.
 51 Within Queens County
 52 Within Queens Borough:
 53 Tract: 005000
 54 Tract: 005800
 55 Tract: 006201
 56 Tract: 006202

S. 8185--A

130

A. 9040--A

- 1 Tract: 008800
- 2 Tract: 009600
- 3 Tract: 010000
- 4 Tract: 010200
- 5 Tract: 013400
- 6 Tract: 013600
- 7 Tract: 013800
- 8 Tract: 014000
- 9 Tract: 014201
- 10 Tract: 015802
- 11 Tract: 016400
- 12 Tract: 016600
- 13 Tract: 016800
- 14 Tract: 017000
- 15 Tract: 021602
- 16 Tract: 021603
- 17 Tract: 049301
- 18 Tract: 049302
- 19 Tract: 049500
- 20 Tract: 049700
- 21 Tract: 050500
- 22 Tract: 050700
- 23 Tract: 051100
- 24 Tract: 051300
- 25 Tract: 051500
- 26 Tract: 051700
- 27 Tract: 060701
- 28 Tract: 061302
- 29 Tract: 061900
- 30 Tract: 062100
- 31 Tract: 065501
- 32 Tract: 065702
- 33 Tract: 065703
- 34 Tract: 065900
- 35 Tract: 066100
- 36 Tract: 066301
- 37 Tract: 066302
- 38 Tract: 066501
- 39 Tract: 066701
- 40 Tract: 066900
- 41 Tract: 067100
- 42 Tract: 067700
- 43 Tract: 067900
- 44 Tract: 068700
- 45 Tract: 069300
- 46 Tract: 069500
- 47 Tract: 069701
- 48 Tract: 069702
- 49 Tract: 070300
- 50 Tract: 070700
- 51 Tract: 070900
- 52 Tract: 071100
- 53 Tract: 071305
- 54 Tract: 071306
- 55 Tract: 072300
- 56 Tract: 072900

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A. 9040--A

1 Tract: 073100
 2 Tract: 073700
 3 Tract: 074900
 4 Tract: 075701
 5 Tract: 076901
 6 Tract: 076902
 7 Tract: 077300
 8 Tract: 077500
 9 Tract: 083800
 10 Tract: 084000
 11 Tract: 084601
 12 Tract: 086400
 13 Tract: 088400
 14 Tract: 089201
 15 Tract: 089202
 16 Tract: 091602
 17 Tract: 091603
 18 Tract: 091604
 19 Tract: 091800
 20 Tract: 092200
 21 Tract: 092800
 22 Tract: 093401
 23 Tract: 093402
 24 Tract: 093800
 25 Tract: 107201
 26 Tract: 004002 Blocks: 1012-1014
 27 Tract: 004401 Blocks: 1004-1013 2000-2011
 28 Tract: 005200 Block: 2003
 29 Tract: 005400 Blocks: 1002 1005-1007 2000-2006 3002-3010 4008-4010
 30 Tract: 008600 Blocks: 1000-1004 1007-1015 2000-2014
 31 Tract: 009400 Blocks: 1000-1006 2001-2004
 32 Tract: 010400 Blocks: 1001-1003 2000-2005
 33 Tract: 010600 Blocks: 2000-2004
 34 Tract: 014202 Blocks: 1000-1009 2000-2005 2007-2012
 35 Tract: 014800 Blocks: 1000-1007
 36 Tract: 015000 Blocks: 1000-1005 2000-2001
 37 Tract: 015200 Blocks: 1001-1006 2001-2006
 38 Tract: 015400 Blocks: 1000-1005 2000-2001
 39 Tract: 015600 Blocks: 1000-1005 2000-2001
 40 Tract: 015801 Blocks: 1001-1007 2000-2006 3000-3005
 41 Tract: 017200 Blocks: 1000-1007 2005-2006
 42 Tract: 017400 Blocks: 2001-2005
 43 Tract: 017600 Blocks: 1000-1005
 44 Tract: 017800 Blocks: 1001-1007
 45 Tract: 018000 Block: 1007
 46 Tract: 021601 Blocks: 1007-1010
 47 Tract: 024300 Blocks: 1000-1002 1014 3000-3004 3007-3011 4000-4013
 48 Tract: 024500 Blocks: 3000-3001 3005
 49 Tract: 038302 Blocks: 1078-1079 1084-1085 1087
 50 Tract: 047900 Block: 1006
 51 Tract: 048900 Blocks: 1001-1028 2000-2002
 52 Tract: 049900 Blocks: 1000-1001 2004 4004
 53 Tract: 052100 Blocks: 1000 1002
 54 Tract: 053100 Blocks: 2000-2004 3000-3002 3004 3008-3011
 55 Tract: 059900 Blocks: 1000-1001 1003
 56 Tract: 060100 Blocks: 1000 1002-1003

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S. 8185--A

132

A. 9040--A

1 Tract: 060300 Blocks: 1000-1003
 2 Tract: 061301 Block: 1000
 3 Tract: 062500 Blocks: 1000 1002
 4 Tract: 063700 Blocks: 1000-1001 2000-2006 3000 4000-4004
 5 Tract: 064500 Blocks: 1000-1006 2000-2008
 6 Tract: 071600 Block: 1010
 7 Tract: 073900 Blocks: 5001-5002
 8 Tract: 075702 Blocks: 1000-1001 3001
 9 Tract: 081800 Blocks: 2004-2006 3000 3002-3008
 10 Tract: 084602 Blocks: 1001-1003 1007-1013 1017 1020-1035
 11 Tract: 094201 Blocks: 0001 1000-1017 2001-2010
 12 Tract: 094202 Block: 1020
 13 Tract: 094203 Block: 1009
 14 Tract: 107202 Blocks: 0006-0007 0011 0013-0016 1002-1003 1006
 15 1010-1011
 16 Tract: 990100 Blocks: 0002-0006
 17 16. Senate District 16.
 18 Within Queens County
 19 Within Queens Borough:
 20 Tract: 047300
 21 Tract: 047500
 22 Tract: 048100
 23 Tract: 068300
 24 Tract: 071303
 25 Tract: 071304
 26 Tract: 071701
 27 Tract: 071702
 28 Tract: 071900
 29 Tract: 072100
 30 Tract: 074100
 31 Tract: 074300
 32 Tract: 074500
 33 Tract: 074700
 34 Tract: 077902
 35 Tract: 077903
 36 Tract: 077904
 37 Tract: 077906
 38 Tract: 077907
 39 Tract: 077908
 40 Tract: 079300
 41 Tract: 080301
 42 Tract: 080302
 43 Tract: 080900
 44 Tract: 084901
 45 Tract: 090700
 46 Tract: 091900
 47 Tract: 092500
 48 Tract: 092900
 49 Tract: 093900
 50 Tract: 094500
 51 Tract: 094700
 52 Tract: 097300
 53 Tract: 098100
 54 Tract: 099701
 55 Tract: 101700
 56 Tract: 102900

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S. 8185--A

133

A. 9040--A

1 Tract: 103900
 2 Tract: 108500
 3 Tract: 122300
 4 Tract: 122702
 5 Tract: 122703
 6 Tract: 122704
 7 Tract: 124100
 8 Tract: 124700
 9 Tract: 125700
 10 Tract: 126500
 11 Tract: 126700
 12 Tract: 127700
 13 Tract: 129102
 14 Tract: 133300
 15 Tract: 133900
 16 Tract: 134100
 17 Tract: 134701
 18 Tract: 134702
 19 Tract: 022001 Blocks: 1000 2000
 20 Tract: 026501 Block: 1002
 21 Tract: 026700 Blocks: 2002-2005 3004-3007
 22 Tract: 026902 Blocks: 1001-1003 2000-2003
 23 Tract: 027101 Blocks: 2000 3000
 24 Tract: 033100 Block: 0005
 25 Tract: 038301 Blocks: 1000 1010-1012 1026-1027
 26 Tract: 038302 Blocks: 1021 1031-1032 1034-1077 1080-1083 1086 1088
 27 1090-1091
 28 Tract: 043701 Blocks: 2001 2004
 29 Tract: 043702 Block: 1000
 30 Tract: 044302 Blocks: 3004-3005
 31 Tract: 045700 Blocks: 1003-1005 2000-2002
 32 Tract: 045900 Blocks: 1003-1004 2002
 33 Tract: 046100 Blocks: 1003-1005
 34 Tract: 046700 Blocks: 4002-4003
 35 Tract: 046901 Blocks: 1001 2000-2001
 36 Tract: 047100 Blocks: 1002-1004 2000-2004
 37 Tract: 047900 Blocks: 1000-1005 1007 2000-2009 3000-3006
 38 Tract: 048301 Blocks: 1000 1004-1005
 39 Tract: 048500 Blocks: 1000-1005 2000-2004 3000-3006
 40 Tract: 048900 Block: 1000
 41 Tract: 049201 Block: 1000
 42 Tract: 049900 Blocks: 2000-2003 2005 3000-3012 4000-4003 4005
 43 Tract: 055200 Block: 1009
 44 Tract: 073900 Blocks: 1000-1002 2000-2002 3000-3003 4000-4003 5000
 45 Tract: 075702 Blocks: 2000-2016 3000
 46 Tract: 077905 Blocks: 1000 1002-1009 2000
 47 Tract: 079702 Blocks: 1000-1002 3000 4000-4003
 48 Tract: 079900 Blocks: 1000-1003 1005-1011 2000-2008
 49 Tract: 083700 Blocks: 1010-1011 1015 3007-3008
 50 Tract: 086900 Blocks: 1005-1008 1013-1019 2000-2009 2011 2016-2017
 51 Tract: 087100 Blocks: 1000-1002 2006-2010 2016
 52 Tract: 088903 Blocks: 1000-1004 1006-1010 1013-1014
 53 Tract: 098700 Blocks: 1000-1012 2000-2014
 54 Tract: 099100 Blocks: 1000-1004 2000-2002 3000-3019 4000-4025 5000-5016
 55 Tract: 099704 Blocks: 3003-3004
 56 Tract: 103300 Blocks: 1000-1009 2000-2007 3000-3007 3009 4000-4006

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A. 9040--A

1 Tract: 104700 Blocks: 1000-1002 1005 5000-5005
 2 Tract: 105900 Blocks: 4003 4008
 3 Tract: 109900 Blocks: 1000-1005 3000-3004
 4 Tract: 113900 Blocks: 1000-1001
 5 Tract: 114100 Blocks: 1000-1007 1009-1018
 6 Tract: 114700 Blocks: 1000-1001
 7 Tract: 128300 Blocks: 1001-1005 1007-1018
 8 Tract: 129103 Blocks: 3000-3009
 9 Tract: 129104 Blocks: 2000-2007 3001-3002 4000-4009
 10 Tract: 138502 Block: 1023
 11 Tract: 140300 Block: 2012
 12 17. Senate District 17.
 13 Within Kings County
 14 Within Brooklyn Borough:
 15 Tract: 056301
 16 Tract: 056302
 17 Tract: 056500
 18 Tract: 057300
 19 Tract: 057500
 20 Tract: 057901
 21 Tract: 057902
 22 Tract: 118600
 23 Tract: 044902 Blocks: 1000-1002
 24 Tract: 056100 Blocks: 1000-1006 1008 2000-2002 3000-3003 4000-4005
 25 Tract: 056900 Blocks: 1000 1002 2000-2002 2006
 26 Tract: 057100 Blocks: 1000-1002 3000-3001 4000-4003
 27 Tract: 058901 Blocks: 1000-1003 2000-2002
 28 Tract: 058902 Blocks: 1000-1001
 29 Tract: 117800 Blocks: 1007-1008
 30 Tract: 118800 Blocks: 1000-1005 2000-2001 2003-2004 3000-3001 3003
 31 Tract: 119000 Blocks: 1000 1004-1005 2000-2002
 32 Tract: 120200 Blocks: 1000 2001
 33 Within Queens County
 34 Within Queens Borough:
 35 Tract: 000101
 36 Tract: 000102
 37 Tract: 000103
 38 Tract: 000104
 39 Tract: 000200
 40 Tract: 000400
 41 Tract: 000600
 42 Tract: 000701
 43 Tract: 000702
 44 Tract: 000800
 45 Tract: 001000
 46 Tract: 001200
 47 Tract: 001400
 48 Tract: 001600
 49 Tract: 001800
 50 Tract: 001901
 51 Tract: 001902
 52 Tract: 002000
 53 Tract: 002200
 54 Tract: 002400
 55 Tract: 002600
 56 Tract: 002800

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A. 9040--A

1 Tract: 003000
2 Tract: 003200
3 Tract: 003400
4 Tract: 003600
5 Tract: 003800
6 Tract: 004001
7 Tract: 004200
8 Tract: 009800
9 Tract: 010800
10 Tract: 011000
11 Tract: 011200
12 Tract: 011400
13 Tract: 011600
14 Tract: 011800
15 Tract: 012000
16 Tract: 012200
17 Tract: 012400
18 Tract: 012601
19 Tract: 012602
20 Tract: 012800
21 Tract: 013000
22 Tract: 013200
23 Tract: 014400
24 Tract: 018700
25 Tract: 019901
26 Tract: 019902
27 Tract: 019903
28 Tract: 020500
29 Tract: 021900
30 Tract: 022900
31 Tract: 052500
32 Tract: 053501
33 Tract: 053502
34 Tract: 053901
35 Tract: 053902
36 Tract: 054500
37 Tract: 054700
38 Tract: 054900
39 Tract: 055100
40 Tract: 055300
41 Tract: 055500
42 Tract: 055700
43 Tract: 055900
44 Tract: 056100
45 Tract: 056500
46 Tract: 056700
47 Tract: 057700
48 Tract: 057900
49 Tract: 058100
50 Tract: 058300
51 Tract: 058500
52 Tract: 058700
53 Tract: 058900
54 Tract: 059100
55 Tract: 059300
56 Tract: 059501

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A. 9040--A

1 Tract: 059502
 2 Tract: 062300
 3 Tract: 062700
 4 Tract: 062900
 5 Tract: 063301
 6 Tract: 063302
 7 Tract: 063500
 8 Tract: 063900
 9 Tract: 064101
 10 Tract: 064102
 11 Tract: 001903 Blocks: 1000-1003 1005-1040
 12 Tract: 004002 Blocks: 1000-1011
 13 Tract: 004401 Blocks: 1000-1003
 14 Tract: 005200 Blocks: 1000-1007 2000-2002 2004
 15 Tract: 005400 Blocks: 1000-1001 1003-1004 3000-3001 4000-4007 4011
 16 Tract: 008600 Blocks: 1005-1006
 17 Tract: 009400 Block: 2000
 18 Tract: 010400 Block: 1000
 19 Tract: 010600 Blocks: 1000-1004
 20 Tract: 014800 Blocks: 1008-1012
 21 Tract: 015000 Blocks: 2002-2005
 22 Tract: 015400 Blocks: 2002-2005
 23 Tract: 015600 Blocks: 2002-2005
 24 Tract: 017101 Blocks: 1012-1015
 25 Tract: 017902 Blocks: 1003-1007 1009-1013 1020-1029
 26 Tract: 018900 Blocks: 2005-2007 3000-3003
 27 Tract: 023501 Blocks: 1001-1006 2000-2002
 28 Tract: 023502 Blocks: 1000-1002
 29 Tract: 024300 Blocks: 1003-1013 2000-2016 3005-3006
 30 Tract: 024500 Blocks: 1003-1005 2000-2004 3002-3004 3006 4000-4006
 31 Tract: 025301 Blocks: 2002-2004
 32 Tract: 025302 Blocks: 2006-2007
 33 Tract: 052100 Blocks: 1001 2000-2007
 34 Tract: 053100 Blocks: 1000-1013 3003 3005-3007 3012-3016
 35 Tract: 059900 Blocks: 1002 2000-2005
 36 Tract: 060100 Blocks: 1001 1004 2000-2005
 37 Tract: 060300 Blocks: 1004-1013
 38 Tract: 061301 Blocks: 1001-1005 2000-2004 3000-3005 4000-4003
 39 Tract: 062500 Blocks: 1001 1003-1007 2000-2005
 40 Tract: 063700 Blocks: 1002 3001-3008 4005-4007
 41 Tract: 064500 Block: 2009
 42 18. Senate District 18.
 43 Within Kings County
 44 Within Brooklyn Borough:
 45 Tract: 025500
 46 Tract: 025700
 47 Tract: 025902
 48 Tract: 028501
 49 Tract: 028502
 50 Tract: 038900
 51 Tract: 039100
 52 Tract: 039300
 53 Tract: 039500
 54 Tract: 039700
 55 Tract: 039900
 56 Tract: 040100

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S. 8185--A

137

A. 9040--A

1 Tract: 040300
2 Tract: 040500
3 Tract: 040700
4 Tract: 040900
5 Tract: 041100
6 Tract: 041300
7 Tract: 041500
8 Tract: 041700
9 Tract: 041900
10 Tract: 042100
11 Tract: 042300
12 Tract: 042500
13 Tract: 042700
14 Tract: 042900
15 Tract: 043100
16 Tract: 043300
17 Tract: 043500
18 Tract: 043700
19 Tract: 043900
20 Tract: 044100
21 Tract: 044300
22 Tract: 044500
23 Tract: 044700
24 Tract: 044901
25 Tract: 045300
26 Tract: 047700
27 Tract: 048100
28 Tract: 048500
29 Tract: 048900
30 Tract: 049100
31 Tract: 049301
32 Tract: 049302
33 Tract: 049500
34 Tract: 049700
35 Tract: 049900
36 Tract: 050100
37 Tract: 050300
38 Tract: 050500
39 Tract: 051100
40 Tract: 051300
41 Tract: 051500
42 Tract: 051700
43 Tract: 051900
44 Tract: 052300
45 Tract: 052500
46 Tract: 052700
47 Tract: 053500
48 Tract: 053900
49 Tract: 054300
50 Tract: 054500
51 Tract: 054700
52 Tract: 054900
53 Tract: 055100
54 Tract: 055300
55 Tract: 055500
56 Tract: 055700

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S. 8185--A

138

A. 9040--A

1 Tract: 059100
2 Tract: 059300
3 Tract: 114201
4 Tract: 114202
5 Tract: 117201
6 Tract: 117202
7 Tract: 117400
8 Tract: 117601
9 Tract: 117602
10 Tract: 118000
11 Tract: 118201
12 Tract: 118202
13 Tract: 118400
14 Tract: 028700 Blocks: 1000-1001
15 Tract: 044902 Blocks: 1003-1028 2000-2009 3000-3029
16 Tract: 052900 Blocks: 3002-3003 3008
17 Tract: 053300 Blocks: 5000 5008
18 Tract: 053700 Blocks: 1000 2008-2009
19 Tract: 056100 Block: 1007
20 Tract: 056900 Blocks: 1001 2003-2005
21 Tract: 057100 Blocks: 2000-2001 3002-3004
22 Tract: 058901 Blocks: 2003-2004
23 Tract: 058902 Block: 1002
24 Tract: 114600 Blocks: 1000-1002 1004-1005 2000-2002
25 Tract: 116800 Blocks: 1000-1003 2000-2003
26 Tract: 117000 Blocks: 1000-1003 2004-2005
27 Tract: 117800 Blocks: 1000-1006
28 Tract: 119800 Blocks: 3000-3002 3004-3007
29 19. Senate District 19.
30 Within Kings County
31 Within Brooklyn Borough:
32 Tract: 057200
33 Tract: 063200
34 Tract: 063600
35 Tract: 063800
36 Tract: 064800
37 Tract: 065000
38 Tract: 065200
39 Tract: 065400
40 Tract: 065800
41 Tract: 066000
42 Tract: 066200
43 Tract: 067000
44 Tract: 068200
45 Tract: 068600
46 Tract: 068800
47 Tract: 069000
48 Tract: 069601
49 Tract: 069602
50 Tract: 069800
51 Tract: 070000
52 Tract: 070201
53 Tract: 070202
54 Tract: 070203
55 Tract: 070601
56 Tract: 070602

S. 8185--A

139

A. 9040--A

- 1 Tract: 073600
- 2 Tract: 073800
- 3 Tract: 089600
- 4 Tract: 091600
- 5 Tract: 091800
- 6 Tract: 092000
- 7 Tract: 092200
- 8 Tract: 095600
- 9 Tract: 096600
- 10 Tract: 096800
- 11 Tract: 097400
- 12 Tract: 098200
- 13 Tract: 098400
- 14 Tract: 098600
- 15 Tract: 098800
- 16 Tract: 099000
- 17 Tract: 099200
- 18 Tract: 099400
- 19 Tract: 099600
- 20 Tract: 099800
- 21 Tract: 100400
- 22 Tract: 100600
- 23 Tract: 100800
- 24 Tract: 101000
- 25 Tract: 101200
- 26 Tract: 101400
- 27 Tract: 101600
- 28 Tract: 101800
- 29 Tract: 102000
- 30 Tract: 102200
- 31 Tract: 102400
- 32 Tract: 102600
- 33 Tract: 102801
- 34 Tract: 102802
- 35 Tract: 103401
- 36 Tract: 103402
- 37 Tract: 105801
- 38 Tract: 105804
- 39 Tract: 107001
- 40 Tract: 107002
- 41 Tract: 107003
- 42 Tract: 107800
- 43 Tract: 109800
- 44 Tract: 110400
- 45 Tract: 110600
- 46 Tract: 111000
- 47 Tract: 111600
- 48 Tract: 111800
- 49 Tract: 112000
- 50 Tract: 112200
- 51 Tract: 112400
- 52 Tract: 112600
- 53 Tract: 112800
- 54 Tract: 113000
- 55 Tract: 113200
- 56 Tract: 115000

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A. 9040--A

1 Tract: 115800
 2 Tract: 116000
 3 Tract: 116200
 4 Tract: 116400
 5 Tract: 116600
 6 Tract: 119200
 7 Tract: 119400
 8 Tract: 119600
 9 Tract: 120000
 10 Tract: 120801
 11 Tract: 120802
 12 Tract: 120803
 13 Tract: 121000
 14 Tract: 121400
 15 Tract: 122000
 16 Tract: 056400 Block: 1002
 17 Tract: 056800 Blocks: 1000 1002-1004 2001-2002
 18 Tract: 057000 Blocks: 1000-1002 2000-2001 3000-3001 4000
 19 Tract: 062600 Blocks: 1000-1003 2000
 20 Tract: 062800 Blocks: 2000-2003
 21 Tract: 064600 Blocks: 1000-1001 2000-2001
 22 Tract: 065600 Blocks: 1000-1002 2000-2003
 23 Tract: 066600 Blocks: 0001-0002 1000-1007 1010-1011
 24 Tract: 067200 Blocks: 1004-1008
 25 Tract: 067400 Blocks: 1002-1005 2001-2002 2004 2006-2007
 26 Tract: 068000 Blocks: 1000 2000
 27 Tract: 069200 Blocks: 1003-1005 2000-2001
 28 Tract: 073000 Blocks: 2000-2005
 29 Tract: 073200 Blocks: 1000-1001 1005
 30 Tract: 074000 Block: 2005
 31 Tract: 074600 Blocks: 1000-1006
 32 Tract: 089000 Blocks: 1001 6000-6001 6004
 33 Tract: 089400 Blocks: 2003-2004 3000-3001 4000-4002
 34 Tract: 089800 Blocks: 2002-2004
 35 Tract: 091000 Blocks: 4002-4005
 36 Tract: 092800 Blocks: 3000-3001
 37 Tract: 095000 Blocks: 1000-1002
 38 Tract: 095400 Blocks: 3000-3003
 39 Tract: 095800 Blocks: 2000 2005-2008
 40 Tract: 096000 Blocks: 1001-1003
 41 Tract: 096200 Blocks: 1004-1007
 42 Tract: 096400 Blocks: 1000-1006 1008 2000-2006
 43 Tract: 097000 Blocks: 1000 1003-1005 2003-2004
 44 Tract: 113400 Blocks: 2000-2001 3001-3002
 45 Tract: 115200 Blocks: 1000-1003 2000-2003 3000-3004
 46 Tract: 115600 Blocks: 1000-1002 2000-2002 4003
 47 Tract: 116800 Blocks: 1004-1005 2004-2005
 48 Tract: 117000 Blocks: 2000-2003 2006
 49 Tract: 118800 Blocks: 2002 3002
 50 Tract: 119000 Blocks: 1001-1003 1006-1007 2003-2004
 51 Tract: 120200 Blocks: 1001-1009 2000 2002-2005
 52 20. Senate District 20.
 53 Within Kings County
 54 Within Brooklyn Borough:
 55 Tract: 013100
 56 Tract: 013300

S. 8185--A

141

A. 9040--A

- 1 Tract: 013500
- 2 Tract: 013700
- 3 Tract: 014101
- 4 Tract: 014901
- 5 Tract: 015100
- 6 Tract: 015300
- 7 Tract: 015500
- 8 Tract: 015700
- 9 Tract: 015900
- 10 Tract: 016500
- 11 Tract: 016700
- 12 Tract: 020700
- 13 Tract: 021300
- 14 Tract: 021500
- 15 Tract: 021700
- 16 Tract: 021900
- 17 Tract: 022100
- 18 Tract: 030300
- 19 Tract: 030500
- 20 Tract: 030700
- 21 Tract: 030900
- 22 Tract: 031100
- 23 Tract: 031300
- 24 Tract: 031500
- 25 Tract: 031701
- 26 Tract: 031702
- 27 Tract: 031900
- 28 Tract: 032100
- 29 Tract: 032300
- 30 Tract: 032500
- 31 Tract: 032700
- 32 Tract: 032900
- 33 Tract: 033100
- 34 Tract: 033300
- 35 Tract: 033500
- 36 Tract: 033701
- 37 Tract: 033702
- 38 Tract: 033900
- 39 Tract: 034100
- 40 Tract: 034300
- 41 Tract: 034500
- 42 Tract: 034700
- 43 Tract: 034901
- 44 Tract: 034902
- 45 Tract: 035101
- 46 Tract: 035102
- 47 Tract: 035301
- 48 Tract: 035302
- 49 Tract: 035500
- 50 Tract: 035701
- 51 Tract: 035702
- 52 Tract: 035900
- 53 Tract: 036100
- 54 Tract: 036300
- 55 Tract: 079601
- 56 Tract: 079801

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A. 9040--A

1 Tract: 079802
 2 Tract: 080000
 3 Tract: 080200
 4 Tract: 080400
 5 Tract: 080600
 6 Tract: 080800
 7 Tract: 081000
 8 Tract: 087401
 9 Tract: 087600
 10 Tract: 088001
 11 Tract: 088002
 12 Tract: 088400
 13 Tract: 089200
 14 Tract: 090000
 15 Tract: 090200
 16 Tract: 092400
 17 Tract: 011700 Block: 1002
 18 Tract: 012901 Blocks: 2000-2001 3000-3002 4000-4001
 19 Tract: 012902 Blocks: 1000-1001 2001 2003-2004 2006
 20 Tract: 013900 Blocks: 1000-1001 2000-2001 3000-3001 4001
 21 Tract: 016100 Blocks: 4000-4004
 22 Tract: 016300 Block: 4000
 23 Tract: 017700 Blocks: 1000-1012 1014
 24 Tract: 020300 Blocks: 1000-1005
 25 Tract: 020500 Blocks: 1000-1001 2000-2001 3000-3001
 26 Tract: 024700 Block: 2003
 27 Tract: 036501 Blocks: 1000-1002 2000-2001
 28 Tract: 036502 Blocks: 1009-1012
 29 Tract: 079602 Block: 1000
 30 Tract: 081400 Block: 2001
 31 Tract: 081600 Blocks: 1000-1002
 32 Tract: 081800 Block: 1000 2000
 33 Tract: 082000 Block: 1000
 34 Tract: 082200 Block: 1000
 35 Tract: 086600 Blocks: 1000-1007
 36 Tract: 086800 Block: 1003
 37 Tract: 087800 Blocks: 1000 2000-2001 3000-3001
 38 Tract: 088200 Blocks: 1000-1001 2000-2001 3000-3001
 39 Tract: 088600 Blocks: 1000-1001
 40 Tract: 089400 Blocks: 1000-1002 2000-2002
 41 Tract: 089800 Blocks: 1000-1003 2000-2001
 42 Tract: 091200 Blocks: 2000-2001 3000
 43 21. Senate District 21.
 44 Within Kings County
 45 Within Brooklyn Borough:
 46 Tract: 046000
 47 Tract: 048200
 48 Tract: 049200
 49 Tract: 050600
 50 Tract: 050801
 51 Tract: 050803
 52 Tract: 050804
 53 Tract: 051001
 54 Tract: 051002
 55 Tract: 051200
 56 Tract: 051400

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A. 9040--A

1 Tract: 051601
2 Tract: 051602
3 Tract: 051800
4 Tract: 052000
5 Tract: 052600
6 Tract: 067800
7 Tract: 072000
8 Tract: 072200
9 Tract: 072400
10 Tract: 072600
11 Tract: 072800
12 Tract: 073400
13 Tract: 074200
14 Tract: 075000
15 Tract: 075200
16 Tract: 076400
17 Tract: 076600
18 Tract: 077000
19 Tract: 077200
20 Tract: 077400
21 Tract: 077600
22 Tract: 078000
23 Tract: 078200
24 Tract: 078400
25 Tract: 078601
26 Tract: 078602
27 Tract: 078801
28 Tract: 078802
29 Tract: 079001
30 Tract: 079002
31 Tract: 079201
32 Tract: 079202
33 Tract: 079400
34 Tract: 082400
35 Tract: 082600
36 Tract: 082800
37 Tract: 083000
38 Tract: 083200
39 Tract: 083400
40 Tract: 083600
41 Tract: 083800
42 Tract: 084000
43 Tract: 084600
44 Tract: 084800
45 Tract: 085000
46 Tract: 085200
47 Tract: 085400
48 Tract: 085600
49 Tract: 085800
50 Tract: 086000
51 Tract: 086200
52 Tract: 086400
53 Tract: 087000
54 Tract: 087200
55 Tract: 088800
56 Tract: 093000

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S. 8185--A

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A. 9040--A

1 Tract: 093200
 2 Tract: 093400
 3 Tract: 093600
 4 Tract: 093800
 5 Tract: 094401
 6 Tract: 094402
 7 Tract: 094600
 8 Tract: 152200
 9 Tract: 017700 Block: 1013
 10 Tract: 047800 Block: 1000
 11 Tract: 048400 Blocks: 1000-1004 2000-2002
 12 Tract: 049000 Blocks: 1000-1004 2000-2002
 13 Tract: 049400 Blocks: 1000-1003 2000-2003
 14 Tract: 050401 Blocks: 2006-2008
 15 Tract: 050402 Blocks: 2000-2003
 16 Tract: 052800 Blocks: 1000-1004 2001-2002
 17 Tract: 053200 Blocks: 1000-1002 1004-1005 2000
 18 Tract: 067200 Blocks: 1000-1003
 19 Tract: 067400 Blocks: 1000-1001 2000 2003
 20 Tract: 067600 Blocks: 1000-1003 2000-2005
 21 Tract: 068000 Blocks: 1001-1003 2001-2003
 22 Tract: 069200 Blocks: 1000-1002 2002
 23 Tract: 073000 Blocks: 1000-1007
 24 Tract: 073200 Blocks: 1002-1004 1006 2000-2005
 25 Tract: 074000 Blocks: 1000-1004 2000-2004
 26 Tract: 076200 Blocks: 1000-1001 2000 3000-3001
 27 Tract: 079602 Blocks: 1001 2000-2002
 28 Tract: 081400 Blocks: 1000-1005 2000 2002-2005
 29 Tract: 081600 Blocks: 1003-1005 2000-2003
 30 Tract: 081800 Blocks: 1001 2001-2004 3000-3001
 31 Tract: 082000 Blocks: 1001 2000 3000-3001
 32 Tract: 082200 Blocks: 2000 3000 4000-4001
 33 Tract: 086600 Blocks: 2000-2002 3000-3002
 34 Tract: 086800 Blocks: 1000-1002 2000-2003 3000-3003
 35 Tract: 087800 Blocks: 1001 3002
 36 Tract: 088200 Blocks: 4000-4002
 37 Tract: 088600 Blocks: 1002 2000-2003 3000-3007
 38 Tract: 089000 Blocks: 1000 1002 2000-2001 3000 4000-4001 5000-5002
 39 6002-6003
 40 Tract: 092800 Blocks: 1000-1003 2000-2005
 41 Tract: 095000 Blocks: 1003-1006 2000-2004
 42 Tract: 095400 Blocks: 1000-1003 2000-2003
 43 Tract: 095800 Blocks: 1000-1004 2001-2004
 44 Tract: 096000 Block: 1000 1004-1022
 45 Tract: 096200 Blocks: 1000-1003 1008-1012
 46 Tract: 096400 Block: 1007
 47 Tract: 097000 Blocks: 1001-1002 2000-2002
 48 22. Senate District 22.
 49 Within Kings County
 50 Within Brooklyn Borough:
 51 Tract: 001100
 52 Tract: 002000
 53 Tract: 003000
 54 Tract: 003600
 55 Tract: 003700
 56 Tract: 003900

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S. 8185--A

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A. 9040--A

1 Tract: 004100
 2 Tract: 004300
 3 Tract: 005800
 4 Tract: 006000
 5 Tract: 006200
 6 Tract: 006400
 7 Tract: 006600
 8 Tract: 006700
 9 Tract: 006800
 10 Tract: 006902
 11 Tract: 007000
 12 Tract: 007100
 13 Tract: 007200
 14 Tract: 007400
 15 Tract: 007500
 16 Tract: 007600
 17 Tract: 007700
 18 Tract: 007800
 19 Tract: 008000
 20 Tract: 008200
 21 Tract: 008400
 22 Tract: 011901
 23 Tract: 011902
 24 Tract: 012100
 25 Tract: 012700
 26 Tract: 013000
 27 Tract: 013800
 28 Tract: 014000
 29 Tract: 014200
 30 Tract: 014800
 31 Tract: 015000
 32 Tract: 015200
 33 Tract: 015400
 34 Tract: 016000
 35 Tract: 016600
 36 Tract: 017000
 37 Tract: 017200
 38 Tract: 017800
 39 Tract: 018000
 40 Tract: 027800
 41 Tract: 028400
 42 Tract: 028800
 43 Tract: 029000
 44 Tract: 029600
 45 Tract: 030800
 46 Tract: 037402
 47 Tract: 058800
 48 Tract: 059000
 49 Tract: 000200 Blocks: 1000-1008 1011-1019
 50 Tract: 000900 Blocks: 1000 1004-1009 2000-2001 2003-2004
 51 Tract: 001300 Blocks: 1013-1015 1020-1021 1023
 52 Tract: 001502 Blocks: 1002-1004 1006-1016
 53 Tract: 001801 Blocks: 1006 2001-2003
 54 Tract: 001802 Blocks: 1007-1009
 55 Tract: 001804 Block: 1001
 56 Tract: 002200 Blocks: 1004-1010 2000-2007 3000-3011 4001-4004

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S. 8185--A

146

A. 9040--A

1 Tract: 003300 Blocks: 2005-2007
 2 Tract: 003400 Blocks: 1001 1005-1009 1011-1012 2000-2004 3000-3003
 3 Tract: 003800 Blocks: 1000-1003 1005-1007
 4 Tract: 004400 Blocks: 1000-1004 1006-1013 2000-2005
 5 Tract: 004500 Blocks: 1002-1003 4003-4004
 6 Tract: 004600 Blocks: 1000-1007 1009-1012
 7 Tract: 005000 Blocks: 1000-1002 1004-1005 2000-2003 3000-3003
 8 Tract: 005201 Blocks: 1000-1003 1005-1006
 9 Tract: 005202 Blocks: 1000-1002 2000-2005
 10 Tract: 005400 Blocks: 1000-1004 2000-2002 3000-3002
 11 Tract: 005601 Blocks: 1000-1004 2000-2004
 12 Tract: 005602 Blocks: 1000-1006
 13 Tract: 006500 Blocks: 1000-1001 2000-2001 3000-3001 4000-4001
 14 5000-5001 7000 7002
 15 Tract: 006901 Blocks: 1000-1001 2001
 16 Tract: 009600 Blocks: 3000-3001 4000-4001
 17 Tract: 009800 Blocks: 1000 2000 4000
 18 Tract: 010000 Blocks: 4000-4001
 19 Tract: 010100 Blocks: 1000-1005 2000-2004 3000 3002-3006
 20 Tract: 011700 Blocks: 1000-1001 1003 2000-2003 3000-3003
 21 Tract: 012200 Block: 1000 2000
 22 Tract: 012600 Blocks: 1002-1007 2002-2005 3002-3004
 23 Tract: 013400 Blocks: 1000-1002 1009-1017 2000-2002 3000-3003
 24 Tract: 013600 Blocks: 1003-1006 2000-2001 3000-3001 4000-4001
 25 Tract: 013900 Block: 4000
 26 Tract: 014102 Blocks: 1000-1001
 27 Tract: 014300 Blocks: 1000-1002 1005-1006 2002-2005 3000-3001
 28 Tract: 014500 Blocks: 2000-2001 3000-3002 4000-4003
 29 Tract: 016200 Blocks: 1000-1002 2000-2007 2010-2011
 30 Tract: 016400 Blocks: 1000-1019 1021 1026-1029
 31 Tract: 016800 Blocks: 1000-1008
 32 Tract: 017400 Blocks: 1000-1004 2000-2002
 33 Tract: 017600 Blocks: 1000-1004 2000-2003
 34 Tract: 018200 Block: 2005
 35 Tract: 018400 Blocks: 2000-2003
 36 Tract: 018600 Blocks: 2000-2002
 37 Tract: 018800 Blocks: 2001-2003
 38 Tract: 020000 Block: 2003
 39 Tract: 020200 Blocks: 2002-2003
 40 Tract: 020400 Blocks: 2001-2003
 41 Tract: 020600 Blocks: 2000-2003
 42 Tract: 027000 Blocks: 2002-2003
 43 Tract: 027200 Blocks: 3000-3001
 44 Tract: 028000 Blocks: 1000-1002 2000-2005
 45 Tract: 028200 Blocks: 1000-1003 2000-2003 3000-3001
 46 Tract: 028600 Blocks: 1000-1001 2000 3000 4000-4002 5000-5002
 47 Tract: 029200 Blocks: 1000-1002 2000-2003 3000-3002
 48 Tract: 029400 Blocks: 1000-1004
 49 Tract: 029800 Blocks: 1004 3000-3002
 50 Tract: 030000 Blocks: 1000-1001 2000
 51 Tract: 030200 Blocks: 1000-1002
 52 Tract: 030400 Blocks: 1003-1005 1010 2000-2004 3000-3008
 53 Tract: 030600 Block: 1010
 54 Tract: 031401 Blocks: 1000-1005 2000-2002 3007-3009 5000-5001
 55 6000-6001
 56 Tract: 035400 Blocks: 1000-1002 1009-1010

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A. 9040--A

1 Tract: 036600 Blocks: 1000-1003
 2 Tract: 037000 Blocks: 2000-2003 3000-3007 4000-4003
 3 Tract: 037401 Blocks: 1000-1001 2002-2005 3000-3005 4000-4001
 4 5000-5007
 5 Tract: 058400 Blocks: 1002 2005-2013
 6 Tract: 058600 Blocks: 2000-2004
 7 Tract: 059200 Blocks: 2001-2002 2004 3001-3002
 8 Tract: 060000 Blocks: 5001-5002
 9 Tract: 060600 Block: 1000 1003-1005 2000-2005
 10 23. Senate District 23.
 11 Within Kings County
 12 Within Brooklyn Borough:
 13 Tract: 000100
 14 Tract: 000301
 15 Tract: 000501
 16 Tract: 000502
 17 Tract: 000700
 18 Tract: 001803
 19 Tract: 002100
 20 Tract: 004700
 21 Tract: 004900
 22 Tract: 005100
 23 Tract: 005301
 24 Tract: 005302
 25 Tract: 005303
 26 Tract: 005900
 27 Tract: 006300
 28 Tract: 008500
 29 Tract: 031402
 30 Tract: 032600
 31 Tract: 032800
 32 Tract: 033000
 33 Tract: 033600
 34 Tract: 034000
 35 Tract: 034200
 36 Tract: 034800
 37 Tract: 035000
 38 Tract: 035200
 39 Tract: 035601
 40 Tract: 035602
 41 Tract: 036001
 42 Tract: 036002
 43 Tract: 036200
 44 Tract: 036400
 45 Tract: 061002
 46 Tract: 061003
 47 Tract: 000200 Blocks: 1009-1010
 48 Tract: 000900 Blocks: 1001-1003 2002
 49 Tract: 001300 Blocks: 1000-1012 1016-1019 1022 1024 2000-2006
 50 Tract: 001501 Blocks: 1000-1011
 51 Tract: 001502 Blocks: 1000-1001
 52 Tract: 001801 Blocks: 0001-0002 1000-1005 1007-1010 2000
 53 Tract: 001802 Blocks: 0001 1000-1006 1010-1011
 54 Tract: 001804 Blocks: 0001 1000
 55 Tract: 002200 Blocks: 1000-1003 4000
 56 Tract: 002300 Blocks: 1001-1005 3002-3006 3008-3009

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A. 9040--A

1 Tract: 003400 Blocks: 0001 1000 1002-1004 1010
 2 Tract: 003800 Blocks: 0001 1004
 3 Tract: 004400 Blocks: 0001 1005
 4 Tract: 004500 Blocks: 1000-1001 2000-2003 3000-3001 4000-4002
 5 Tract: 004600 Blocks: 0001 1008
 6 Tract: 005000 Blocks: 0001 1003
 7 Tract: 005201 Blocks: 0001 1004
 8 Tract: 005202 Blocks: 0001 1003 2006
 9 Tract: 005400 Blocks: 0001 1005
 10 Tract: 005601 Blocks: 0001 1005
 11 Tract: 005602 Blocks: 0001-0002 1007
 12 Tract: 006500 Blocks: 6000-6003 7001 7003-7006
 13 Tract: 006901 Block: 2000
 14 Tract: 010100 Block: 3001
 15 Tract: 016200 Blocks: 2008-2009
 16 Tract: 016400 Blocks: 0001-0002 1020 1022-1025
 17 Tract: 016800 Blocks: 0001 1009
 18 Tract: 017400 Blocks: 0001 1005
 19 Tract: 017600 Blocks: 0001 1005
 20 Tract: 028000 Blocks: 0001 1003-1004
 21 Tract: 028200 Blocks: 0001 1004-1005
 22 Tract: 028600 Blocks: 0001-0002 1002-1003
 23 Tract: 029200 Blocks: 0001 3003
 24 Tract: 029400 Blocks: 0001 1005-1010
 25 Tract: 030400 Blocks: 0001-0002 1006-1009
 26 Tract: 031401 Blocks: 0001 3000-3006 3010-3011 4000
 27 Tract: 035400 Blocks: 1003-1008 2000-2002 3000
 28 Tract: 036600 Blocks: 1004-1011 2000-2002 3000-3003
 29 Tract: 060800 Blocks: 1012-1017 1020-1022 2000-2007 3006-3007
 30 Tract: 061004 Blocks: 1000-1003 2000-2001 3000-3001 4000-4001
 31 5001-5002
 32 Tract: 990100 Blocks: 0003-0008
 33 Within Richmond County
 34 Within Staten Island Borough:
 35 Tract: 000300
 36 Tract: 000600
 37 Tract: 000700
 38 Tract: 000800
 39 Tract: 000900
 40 Tract: 001100
 41 Tract: 001700
 42 Tract: 001800
 43 Tract: 002001
 44 Tract: 002100
 45 Tract: 002700
 46 Tract: 002900
 47 Tract: 003300
 48 Tract: 003600
 49 Tract: 003900
 50 Tract: 004001
 51 Tract: 004002
 52 Tract: 004003
 53 Tract: 004004
 54 Tract: 004700
 55 Tract: 005901
 56 Tract: 005902

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S. 8185--A

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A. 9040--A

1 Tract: 006700
 2 Tract: 007500
 3 Tract: 007700
 4 Tract: 008100
 5 Tract: 009701
 6 Tract: 009702
 7 Tract: 010500
 8 Tract: 012100
 9 Tract: 012500
 10 Tract: 013301
 11 Tract: 013302
 12 Tract: 014100
 13 Tract: 020701
 14 Tract: 020702
 15 Tract: 021300
 16 Tract: 022300
 17 Tract: 023100
 18 Tract: 023900
 19 Tract: 024700
 20 Tract: 030302
 21 Tract: 031901
 22 Tract: 031902
 23 Tract: 002002 Blocks: 1000-1022 2004 2010
 24 Tract: 005000 Blocks: 2000 2002-2003 2007 3000
 25 Tract: 006400 Blocks: 2000-2007 3000-3012
 26 Tract: 007001 Blocks: 2000-2007 2013-2014
 27 Tract: 007002 Blocks: 1000-1014 2000-2022 3000-3002 4000-4001
 28 Tract: 007400 Blocks: 1000-1013 2000-2015 3000-3001
 29 Tract: 016901 Blocks: 2013 2015 2019-2021
 30 Tract: 017701 Block: 1000
 31 Tract: 020100 Blocks: 1000-1008
 32 Tract: 030301 Blocks: 1000-1014 2002-2010
 33 Tract: 032300 Blocks: 0001-0003 1000-1018 1021-1024
 34 Tract: 990100 Blocks: 0001-0003
 35 24. Senate District 24.
 36 Within Richmond County
 37 Within Staten Island Borough:
 38 Tract: 009601
 39 Tract: 009602
 40 Tract: 011201
 41 Tract: 011203
 42 Tract: 011204
 43 Tract: 011401
 44 Tract: 011402
 45 Tract: 012200
 46 Tract: 012804
 47 Tract: 012805
 48 Tract: 012806
 49 Tract: 013201
 50 Tract: 013203
 51 Tract: 013204
 52 Tract: 013400
 53 Tract: 013800
 54 Tract: 014604
 55 Tract: 014605
 56 Tract: 014606

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S. 8185--A

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A. 9040--A

1 Tract: 014607
2 Tract: 014608
3 Tract: 014700
4 Tract: 015100
5 Tract: 015400
6 Tract: 015601
7 Tract: 015602
8 Tract: 015603
9 Tract: 017005
10 Tract: 017007
11 Tract: 017009
12 Tract: 017011
13 Tract: 017012
14 Tract: 017013
15 Tract: 017014
16 Tract: 017015
17 Tract: 017016
18 Tract: 017300
19 Tract: 017600
20 Tract: 017702
21 Tract: 018100
22 Tract: 018701
23 Tract: 018703
24 Tract: 018704
25 Tract: 018901
26 Tract: 018902
27 Tract: 019700
28 Tract: 019800
29 Tract: 020803
30 Tract: 020804
31 Tract: 020805
32 Tract: 020806
33 Tract: 022601
34 Tract: 022602
35 Tract: 022801
36 Tract: 022802
37 Tract: 024401
38 Tract: 024402
39 Tract: 024800
40 Tract: 025100
41 Tract: 027301
42 Tract: 027302
43 Tract: 027702
44 Tract: 027704
45 Tract: 027705
46 Tract: 027706
47 Tract: 027900
48 Tract: 029102
49 Tract: 029104
50 Tract: 029105
51 Tract: 029106
52 Tract: 002002 Blocks: 2000-2003 2005-2009
53 Tract: 005000 Blocks: 1000-1015 2001 2004-2006 2008-2015 3001-3013
54 Tract: 006400 Blocks: 1000-1010
55 Tract: 007001 Blocks: 1000-1017 2008-2012
56 Tract: 007002 Blocks: 0001-0002 3003 4002

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S. 8185--A

151

A. 9040--A

1 Tract: 007400 Blocks: 0001-0002
2 Tract: 016901 Blocks: 1000-1015 2000-2012 2014 2016-2018 2022-2025
3 Tract: 017701 Blocks: 1001-1025 2000-2017 3000-3012 4000-4014
4 Tract: 020100 Blocks: 1009-1012 2000-2011 3000-3016
5 Tract: 030301 Blocks: 2000-2001 2011-2018
6 Tract: 032300 Blocks: 1019-1020 1025
7 Tract: 990100 Blocks: 0004-0010
8 25. Senate District 25.
9 Within Kings County
10 Within Brooklyn Borough:
11 Tract: 002901
12 Tract: 003101
13 Tract: 003102
14 Tract: 003500
15 Tract: 017900
16 Tract: 018100
17 Tract: 018300
18 Tract: 018501
19 Tract: 018700
20 Tract: 019100
21 Tract: 019300
22 Tract: 019500
23 Tract: 019700
24 Tract: 019900
25 Tract: 020100
26 Tract: 021100
27 Tract: 022700
28 Tract: 022900
29 Tract: 023100
30 Tract: 023300
31 Tract: 023500
32 Tract: 024100
33 Tract: 024300
34 Tract: 024500
35 Tract: 024900
36 Tract: 025100
37 Tract: 025300
38 Tract: 025901
39 Tract: 026100
40 Tract: 026300
41 Tract: 026500
42 Tract: 026700
43 Tract: 026900
44 Tract: 027100
45 Tract: 027300
46 Tract: 027500
47 Tract: 027700
48 Tract: 027900
49 Tract: 028100
50 Tract: 028300
51 Tract: 028900
52 Tract: 029100
53 Tract: 029300
54 Tract: 029500
55 Tract: 029700
56 Tract: 029900

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S. 8185--A

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A. 9040--A

1 Tract: 030100
 2 Tract: 036700
 3 Tract: 036900
 4 Tract: 037100
 5 Tract: 037300
 6 Tract: 037500
 7 Tract: 037700
 8 Tract: 037900
 9 Tract: 038100
 10 Tract: 038300
 11 Tract: 038500
 12 Tract: 038700
 13 Tract: 050700
 14 Tract: 050900
 15 Tract: 053101
 16 Tract: 053102
 17 Tract: 090600
 18 Tract: 090800
 19 Tract: 114400
 20 Tract: 123700
 21 Tract: 001501 Blocks: 2000-2012
 22 Tract: 001502 Blocks: 1005 1017-1018
 23 Tract: 002300 Blocks: 1000 2000 3000-3001 3007
 24 Tract: 003300 Blocks: 1000-1001 2000-2004 2008-2011
 25 Tract: 012901 Blocks: 1000-1001
 26 Tract: 012902 Blocks: 2000 2002 2005
 27 Tract: 016100 Blocks: 1000-1003 2000 3000-3001
 28 Tract: 016300 Blocks: 1000 2000-2002 3000-3001
 29 Tract: 020300 Blocks: 2000-2002
 30 Tract: 020500 Blocks: 1002 2002 3002
 31 Tract: 024700 Blocks: 1000-1003 2000-2002 2004-2005
 32 Tract: 028700 Blocks: 1002-1006 2000-2002 3000-3002
 33 Tract: 036501 Block: 2002
 34 Tract: 036502 Blocks: 1000-1008 1013
 35 Tract: 052900 Blocks: 1000-1002 2000-2004 3000-3001 3004-3007 3009
 36 Tract: 053300 Blocks: 1000-1002 2000-2002 3000-3001 4000-4001
 37 5001-5007
 38 Tract: 053700 Blocks: 1001-1005 2000-2007 2010-2018
 39 Tract: 091000 Blocks: 1000-1001 2000 3000 4000-4001
 40 Tract: 091200 Block: 1000
 41 Tract: 113400 Blocks: 1000-1006 3000
 42 Tract: 114600 Blocks: 1003 2003-2007
 43 Tract: 115200 Blocks: 1004 2004
 44 Tract: 115600 Blocks: 3000-3001 4000-4002
 45 Tract: 119800 Blocks: 1000-1012 2000-2007 3003
 46 26. Senate District 26.
 47 Within Kings County
 48 Within Brooklyn Borough:
 49 Tract: 021800
 50 Tract: 022000
 51 Tract: 023000
 52 Tract: 023200
 53 Tract: 023400
 54 Tract: 023600
 55 Tract: 023800
 56 Tract: 024000

S. 8185--A

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A. 9040--A

- 1 Tract: 024200
- 2 Tract: 024400
- 3 Tract: 038800
- 4 Tract: 039000
- 5 Tract: 039200
- 6 Tract: 039400
- 7 Tract: 039600
- 8 Tract: 041402
- 9 Tract: 041600
- 10 Tract: 041800
- 11 Tract: 042000
- 12 Tract: 042200
- 13 Tract: 044200
- 14 Tract: 044400
- 15 Tract: 044800
- 16 Tract: 045000
- 17 Tract: 045200
- 18 Tract: 045400
- 19 Tract: 045600
- 20 Tract: 045800
- 21 Tract: 046201
- 22 Tract: 046202
- 23 Tract: 046400
- 24 Tract: 046800
- 25 Tract: 047000
- 26 Tract: 047200
- 27 Tract: 047400
- 28 Tract: 047600
- 29 Tract: 048000
- 30 Tract: 053000
- 31 Tract: 053400
- 32 Tract: 053800
- 33 Tract: 054200
- 34 Tract: 054400
- 35 Tract: 054600
- 36 Tract: 054800
- 37 Tract: 055000
- 38 Tract: 055200
- 39 Tract: 055400
- 40 Tract: 055600
- 41 Tract: 055800
- 42 Tract: 056000
- 43 Tract: 056200
- 44 Tract: 056600
- 45 Tract: 057400
- 46 Tract: 057600
- 47 Tract: 057800
- 48 Tract: 058000
- 49 Tract: 058200
- 50 Tract: 059402
- 51 Tract: 059403
- 52 Tract: 059404
- 53 Tract: 059600
- 54 Tract: 059800
- 55 Tract: 061200
- 56 Tract: 061600

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S. 8185--A

154

A. 9040--A

1 Tract: 062000
 2 Tract: 062200
 3 Tract: 064000
 4 Tract: 064200
 5 Tract: 064400
 6 Tract: 074400
 7 Tract: 074800
 8 Tract: 075400
 9 Tract: 075600
 10 Tract: 075800
 11 Tract: 076000
 12 Tract: 076800
 13 Tract: 011400 Blocks: 1001-1004 2003
 14 Tract: 019200 Blocks: 1000-1001 2000-2006 3000 3004 4000
 15 Tract: 021400 Blocks: 1001 2000-2003
 16 Tract: 021600 Blocks: 1000-1002 2000-2002 3000-3001
 17 Tract: 022400 Blocks: 1000-1002 2000-2001 3000-3001 4001-4003
 18 Tract: 022600 Blocks: 1002-1003
 19 Tract: 022800 Blocks: 2000-2003 3000-3003
 20 Tract: 024600 Blocks: 1000-1002 3000-3002
 21 Tract: 024800 Blocks: 2000 2005
 22 Tract: 025000 Blocks: 1000-1001
 23 Tract: 037000 Blocks: 1000-1007
 24 Tract: 037401 Blocks: 2000-2001
 25 Tract: 038600 Blocks: 1000-1001 1006-1009
 26 Tract: 039800 Blocks: 1003 1009-1011
 27 Tract: 040000 Blocks: 1000-1001 1004-1005
 28 Tract: 041000 Block: 1000
 29 Tract: 041401 Blocks: 1000-1001 1003 2000-2002
 30 Tract: 043800 Blocks: 1000-1002 2000-2002
 31 Tract: 044000 Blocks: 1000-1004 2000-2004 3000-3001 3005
 32 Tract: 044600 Blocks: 2000 2003-2004
 33 Tract: 047800 Blocks: 1001-1002 2000-2004 3000-3005
 34 Tract: 048400 Blocks: 3000-3003
 35 Tract: 052800 Block: 2000
 36 Tract: 053200 Blocks: 1003 1006 2001-2005
 37 Tract: 056400 Blocks: 1000-1001 1003 2000-2002 3000-3003
 38 Tract: 056800 Blocks: 1001 2000 2003
 39 Tract: 057000 Blocks: 4001-4007
 40 Tract: 058400 Blocks: 1000-1001 2000-2004
 41 Tract: 058600 Blocks: 1000-1006
 42 Tract: 059200 Blocks: 1000-1003 2000 2003 3000
 43 Tract: 060000 Blocks: 1000-1002 2000-2005 3000-3010 4000-4004 5000
 44 5003-5005
 45 Tract: 060600 Blocks: 1001-1002 1006-1007
 46 Tract: 060800 Blocks: 1000-1011 1018-1019 1023-1038 3000-3005
 47 3008-3009
 48 Tract: 061004 Block: 5000
 49 Tract: 062600 Blocks: 2001-2005
 50 Tract: 062800 Blocks: 1000-1028 2004-2033 3000-3024 4000-4029
 51 Tract: 064600 Blocks: 1002-1003 2002-2003
 52 Tract: 065600 Block: 1003
 53 Tract: 066600 Blocks: 1008-1009 1012-1013
 54 Tract: 074600 Blocks: 2000-2008
 55 Tract: 076200 Blocks: 1002 2001-2002
 56 Tract: 990100 Blocks: 0001-0002

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155

A. 9040--A

1 27. Senate District 27.
2 Within Kings County
3 Within Brooklyn Borough:
4 Tract: 008600
5 Tract: 008800
6 Tract: 009001
7 Tract: 009002
8 Tract: 009201
9 Tract: 009202
10 Tract: 009401
11 Tract: 009402
12 Tract: 010200
13 Tract: 010401
14 Tract: 010402
15 Tract: 010601
16 Tract: 010602
17 Tract: 010801
18 Tract: 010802
19 Tract: 011000
20 Tract: 011200
21 Tract: 011600
22 Tract: 011800
23 Tract: 012000
24 Tract: 012801
25 Tract: 013200
26 Tract: 014700
27 Tract: 014902
28 Tract: 016900
29 Tract: 017100
30 Tract: 017500
31 Tract: 019000
32 Tract: 019400
33 Tract: 019600
34 Tract: 020800
35 Tract: 021000
36 Tract: 021200
37 Tract: 025200
38 Tract: 025400
39 Tract: 025600
40 Tract: 025800
41 Tract: 026000
42 Tract: 026200
43 Tract: 026400
44 Tract: 026600
45 Tract: 026800
46 Tract: 027400
47 Tract: 027600
48 Tract: 038200
49 Tract: 040200
50 Tract: 040400
51 Tract: 040600
52 Tract: 040800
53 Tract: 041200
54 Tract: 042400
55 Tract: 042600
56 Tract: 042800

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S. 8185--A

156

A. 9040--A

1 Tract: 043000
 2 Tract: 043200
 3 Tract: 043400
 4 Tract: 043600
 5 Tract: 048600
 6 Tract: 048800
 7 Tract: 049600
 8 Tract: 049800
 9 Tract: 050001
 10 Tract: 050002
 11 Tract: 050202
 12 Tract: 150200
 13 Tract: 009600 Blocks: 1000-1001 2000-2001
 14 Tract: 009800 Blocks: 1001 2001 3000-3001 4001
 15 Tract: 010000 Blocks: 1000-1001 2000-2001 3000-3001
 16 Tract: 011400 Blocks: 1000 2000-2002 3000-3002
 17 Tract: 012200 Blocks: 1001 2001 3000 4000-4004
 18 Tract: 012600 Blocks: 1000-1001 2000-2001 3000-3001 3005-3007
 19 Tract: 013400 Blocks: 1003-1008
 20 Tract: 013600 Blocks: 1000-1002
 21 Tract: 014102 Blocks: 2000-2001
 22 Tract: 014300 Blocks: 1003-1004 2000-2001 3002
 23 Tract: 014500 Blocks: 1000-1003
 24 Tract: 018200 Blocks: 1000-1003 2000-2004 2006
 25 Tract: 018400 Blocks: 1000-1004
 26 Tract: 018600 Blocks: 1000-1004
 27 Tract: 018800 Blocks: 1000-1005 2000 2002-2004
 28 Tract: 019200 Blocks: 3001-3003 4001
 29 Tract: 019800 Blocks: 1000-1002 2000-2001
 30 Tract: 020000 Blocks: 1000-1002 2000-2002
 31 Tract: 020200 Blocks: 1000-1002 2000-2001
 32 Tract: 020400 Blocks: 1000-1002 2000
 33 Tract: 020600 Blocks: 1000-1003
 34 Tract: 021400 Blocks: 1000 3000-3006
 35 Tract: 021600 Block: 3002
 36 Tract: 022400 Block: 4000
 37 Tract: 022600 Blocks: 1000-1001 1004-1006 2000-2002
 38 Tract: 022800 Blocks: 1000-1003
 39 Tract: 024600 Blocks: 2000-2002
 40 Tract: 024800 Blocks: 1000-1005 2001-2004
 41 Tract: 025000 Blocks: 1002-1007 2000-2005
 42 Tract: 027000 Blocks: 1000-1002 2000-2001
 43 Tract: 027200 Blocks: 1000-1001 2000-2001 3002
 44 Tract: 029800 Blocks: 1000-1003 1005-1006 2000-2004
 45 Tract: 030000 Blocks: 2001 3000-3001 4000-4001 5000-5001 6000
 46 Tract: 030200 Blocks: 1003 2000-2002 3000-3002
 47 Tract: 030400 Blocks: 1000-1002
 48 Tract: 030600 Blocks: 1000-1009
 49 Tract: 038600 Blocks: 1002-1005 2000-2010
 50 Tract: 039800 Blocks: 1000-1002 1004-1008 2000-2005
 51 Tract: 040000 Blocks: 1002-1003 2000-2001 3000-3003
 52 Tract: 041000 Blocks: 1001-1004 2000-2002
 53 Tract: 041401 Block: 1002
 54 Tract: 043800 Blocks: 2003-2005
 55 Tract: 044000 Blocks: 3002-3004
 56 Tract: 044600 Blocks: 1000-1002 2001-2002 2005

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S. 8185--A

157

A. 9040--A

1 Tract: 049000 Blocks: 2003 3000-3001
2 Tract: 049400 Blocks: 3000-3001 4000-4001
3 Tract: 050401 Blocks: 1000-1004 2000-2005
4 Tract: 050402 Blocks: 1000-1002
5 28. Senate District 28.
6 Within New York County
7 Within Manhattan Borough:
8 Tract: 007001
9 Tract: 007002
10 Tract: 007200
11 Tract: 007400
12 Tract: 007600
13 Tract: 007800
14 Tract: 008000
15 Tract: 008200
16 Tract: 008400
17 Tract: 008800
18 Tract: 009000
19 Tract: 009200
20 Tract: 009400
21 Tract: 009600
22 Tract: 009800
23 Tract: 010000
24 Tract: 010200
25 Tract: 010400
26 Tract: 010801
27 Tract: 010802
28 Tract: 010803
29 Tract: 011000
30 Tract: 011202
31 Tract: 011203
32 Tract: 011401
33 Tract: 011402
34 Tract: 011800
35 Tract: 012000
36 Tract: 012200
37 Tract: 012601
38 Tract: 012602
39 Tract: 012800
40 Tract: 013000
41 Tract: 013202
42 Tract: 013203
43 Tract: 013400
44 Tract: 013602
45 Tract: 013603
46 Tract: 013604
47 Tract: 013800
48 Tract: 014000
49 Tract: 014200
50 Tract: 014401
51 Tract: 014601
52 Tract: 014602
53 Tract: 014801
54 Tract: 015001
55 Tract: 015401
56 Tract: 005600 Blocks: 1000-1006 2000-2003

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S. 8185--A

158

A. 9040--A

1 Tract: 005800 Blocks: 1000-1004 2000 2002-2003
 2 Tract: 006200 Blocks: 1000-1002
 3 Tract: 006600 Blocks: 1000 2000 3000-3001 4000 8000-8003 9000
 4 Tract: 006800 Blocks: 1000-1002 6000-6002
 5 Tract: 008601 Blocks: 0001-0003 1000-1003 2000 3000-3015
 6 Tract: 008602 Blocks: 1000-1008
 7 Tract: 008603 Blocks: 1000-1001 2000-2002 3000 4000-4009
 8 Tract: 010100 Block: 1008
 9 Tract: 010601 Blocks: 1000 2000 3000 4000 5000 6000-6004
 10 Tract: 010602 Blocks: 1000 2000-2011 3000-3005 4000
 11 Tract: 010900 Blocks: 1000 1009-1011
 12 Tract: 011201 Block: 1003
 13 Tract: 011300 Blocks: 1000 1011
 14 Tract: 011600 Blocks: 1000-1010 2000 3000-3001
 15 Tract: 011900 Blocks: 1000-1001 1003-1004
 16 Tract: 012400 Blocks: 1000-1003 2000-2001 3000 4000 5000-5001
 17 6000-6002 7000-7002 8000-8002
 18 Tract: 012500 Blocks: 1000-1003 2000
 19 Tract: 013100 Blocks: 2000-2003
 20 Tract: 013201 Blocks: 1000 2000 3000-3004
 21 Tract: 013601 Blocks: 1001-1005
 22 Tract: 013700 Blocks: 2001 3000-3001
 23 Tract: 014402 Blocks: 1000 2000 3000 4000-4002 5000 6000
 24 Tract: 014802 Blocks: 2000-2003 3000-3001 5000
 25 Tract: 015002 Blocks: 1002 2000-2002 3000-3001 4001-4002
 26 Tract: 015200 Blocks: 4000 5000 6004-6005
 27 Tract: 015402 Block: 1000
 28 29. Senate District 29.
 29 Within New York County
 30 Within Manhattan Borough:
 31 Tract: 000100
 32 Tract: 000201
 33 Tract: 000202
 34 Tract: 000500
 35 Tract: 000600
 36 Tract: 000700
 37 Tract: 000800
 38 Tract: 000900
 39 Tract: 001001
 40 Tract: 001002
 41 Tract: 001200
 42 Tract: 001300
 43 Tract: 001401
 44 Tract: 001402
 45 Tract: 001501
 46 Tract: 001502
 47 Tract: 001600
 48 Tract: 001800
 49 Tract: 002000
 50 Tract: 002100
 51 Tract: 002201
 52 Tract: 002202
 53 Tract: 002400
 54 Tract: 002500
 55 Tract: 002601
 56 Tract: 002602

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S. 8185--A

159

A. 9040--A

1 Tract: 002700
 2 Tract: 002800
 3 Tract: 002901
 4 Tract: 002902
 5 Tract: 003001
 6 Tract: 003002
 7 Tract: 003100
 8 Tract: 003200
 9 Tract: 003300
 10 Tract: 003400
 11 Tract: 003601
 12 Tract: 003602
 13 Tract: 003800
 14 Tract: 003900
 15 Tract: 004001
 16 Tract: 004002
 17 Tract: 004100
 18 Tract: 004300
 19 Tract: 004400
 20 Tract: 004500
 21 Tract: 004700
 22 Tract: 004800
 23 Tract: 004900
 24 Tract: 005000
 25 Tract: 006000
 26 Tract: 006400
 27 Tract: 031703
 28 Tract: 031704
 29 Tract: 031900
 30 Tract: 003700 Blocks: 2000 2006 3000 3011-3017
 31 Tract: 004200 Blocks: 1000-1002 1004 2000-2002 3000-3002
 32 Tract: 005200 Blocks: 1000-1001 1005
 33 Tract: 005600 Blocks: 3000-3001
 34 Tract: 006200 Blocks: 0001 1003-1005 2000-2005 3000
 35 Tract: 006600 Blocks: 5000 6000 7000
 36 Tract: 006800 Blocks: 1003 2000-2001 3000-3001 4000-4002 5000-5004
 37 Tract: 008601 Block: 0004
 38 30. Senate District 30.
 39 Within New York County
 40 Within Manhattan Borough:
 41 Tract: 005400
 42 Tract: 005501
 43 Tract: 005502
 44 Tract: 005700
 45 Tract: 005900
 46 Tract: 006100
 47 Tract: 006300
 48 Tract: 006500
 49 Tract: 006700
 50 Tract: 006900
 51 Tract: 007100
 52 Tract: 007300
 53 Tract: 007500
 54 Tract: 007700
 55 Tract: 007900
 56 Tract: 008100

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S. 8185--A

160

A. 9040--A

1 Tract: 008300
 2 Tract: 008700
 3 Tract: 008900
 4 Tract: 009100
 5 Tract: 009300
 6 Tract: 009500
 7 Tract: 009700
 8 Tract: 009901
 9 Tract: 009902
 10 Tract: 009903
 11 Tract: 010300
 12 Tract: 011100
 13 Tract: 011500
 14 Tract: 011700
 15 Tract: 012101
 16 Tract: 012102
 17 Tract: 012700
 18 Tract: 012901
 19 Tract: 012902
 20 Tract: 013300
 21 Tract: 013501
 22 Tract: 013502
 23 Tract: 013900
 24 Tract: 014500
 25 Tract: 014700
 26 Tract: 014900
 27 Tract: 015101
 28 Tract: 015102
 29 Tract: 015301
 30 Tract: 015302
 31 Tract: 015501
 32 Tract: 015502
 33 Tract: 015700
 34 Tract: 015900
 35 Tract: 016100
 36 Tract: 003700 Blocks: 0001-0004 1000-1018 2001-2005 3001-3010
 37 Tract: 004200 Block: 1003
 38 Tract: 005200 Blocks: 1002-1004 2000-2006
 39 Tract: 005800 Blocks: 2001 3000-3002
 40 Tract: 010100 Blocks: 1000-1007
 41 Tract: 010900 Blocks: 1001-1008
 42 Tract: 011201 Blocks: 1000-1002
 43 Tract: 011300 Blocks: 1001-1010
 44 Tract: 011900 Blocks: 1002 1005 2000-2004
 45 Tract: 012500 Blocks: 2001-2004 3000 4000-4001
 46 Tract: 013100 Blocks: 1000-1005 3000-3001
 47 Tract: 013700 Blocks: 1000 2000 4000-4003 5000-5001 6000-6003
 48 Tract: 014300 Blocks: 1001-1003 1005-1033
 49 Tract: 016300 Blocks: 1003-1005 2000-2001 3001-3002 4000-4001
 50 5000-5003
 51 Tract: 016500 Blocks: 1001 2000 3000 5000
 52 31. Senate District 31.
 53 Within Bronx County
 54 Within Bronx Borough:
 55 Tract: 001901
 56 Tract: 001902

S. 8185--A

161

A. 9040--A

- 1 Tract: 001903
- 2 Tract: 001903
- 3 Tract: 002300
- 4 Tract: 002500
- 5 Tract: 002701
- 6 Tract: 002702
- 7 Tract: 003100
- 8 Tract: 003300
- 9 Tract: 003500
- 10 Tract: 003700
- 11 Tract: 003900
- 12 Tract: 004100
- 13 Tract: 004300
- 14 Tract: 005100
- 15 Tract: 005300
- 16 Tract: 005902
- 17 Tract: 006100
- 18 Tract: 006301
- 19 Tract: 006302
- 20 Tract: 006500
- 21 Tract: 006700
- 22 Tract: 006900
- 23 Tract: 007100
- 24 Tract: 007300
- 25 Tract: 014100
- 26 Tract: 017300
- 27 Tract: 017500
- 28 Tract: 017901
- 29 Tract: 018101
- 30 Tract: 018102
- 31 Tract: 018301
- 32 Tract: 018302
- 33 Tract: 018900
- 34 Tract: 019300
- 35 Tract: 019500
- 36 Tract: 019700
- 37 Tract: 019900
- 38 Tract: 020100
- 39 Tract: 020501
- 40 Tract: 020502
- 41 Tract: 020900
- 42 Tract: 021100
- 43 Tract: 021301
- 44 Tract: 021302
- 45 Tract: 021501
- 46 Tract: 021502
- 47 Tract: 021700
- 48 Tract: 021900
- 49 Tract: 022101
- 50 Tract: 022102
- 51 Tract: 022300
- 52 Tract: 022701
- 53 Tract: 024300
- 54 Tract: 007500 Blocks: 1001 2003
- 55 Tract: 007900 Blocks: 4000-4004
- 56 Tract: 014300 Blocks: 1002-1003 1007-1010

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S. 8185--A

162

A. 9040--A

1 Tract: 017701 Blocks: 1000-1002 3001
2 Tract: 017902 Blocks: 1001 2000-2001 3000-3002
3 Tract: 018501 Blocks: 1005 1007-1009
4 Tract: 018502 Block: 4003
5 Tract: 022500 Blocks: 4001-4002 5000-5001 6000-6002
6 Tract: 022702 Blocks: 1000-1005
7 Tract: 023301 Blocks: 1000-1001 2002-2003 3000-3001 4000-4001
8 Tract: 024501 Blocks: 1000 3000
9 Within New York County
10 Within Manhattan Borough:
11 Tract: 018000
12 Tract: 018800
13 Tract: 016200 Blocks: 1000-1002
14 Tract: 017000 Blocks: 1000 4000-4001 5000
15 Tract: 017200 Blocks: 1000-1003 2000 4000 5000-5001
16 Tract: 017800 Blocks: 1000-1001 2000-2002 3000-3008
17 Tract: 018200 Blocks: 1002 3000-3004 4000 5000
18 Tract: 019200 Blocks: 1000-1006 2000 3000
19 Tract: 019400 Blocks: 1000 2000
20 Tract: 024200 Blocks: 0002 1007 3000-3005 3010 3012
21 32. Senate District 32.
22 Within New York County
23 Within Manhattan Borough:
24 Tract: 016400
25 Tract: 016600
26 Tract: 017300
27 Tract: 017401
28 Tract: 017402
29 Tract: 018100
30 Tract: 018400
31 Tract: 018500
32 Tract: 018600
33 Tract: 018900
34 Tract: 019000
35 Tract: 019600
36 Tract: 019701
37 Tract: 019702
38 Tract: 019800
39 Tract: 020000
40 Tract: 020101
41 Tract: 020102
42 Tract: 020300
43 Tract: 020600
44 Tract: 020701
45 Tract: 020800
46 Tract: 020901
47 Tract: 021000
48 Tract: 021200
49 Tract: 021303
50 Tract: 021400
51 Tract: 021500
52 Tract: 021600
53 Tract: 021703
54 Tract: 021800
55 Tract: 022000
56 Tract: 022102

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S. 8185--A

163

A. 9040--A

1 Tract: 022200
 2 Tract: 022400
 3 Tract: 022600
 4 Tract: 022700
 5 Tract: 022800
 6 Tract: 023000
 7 Tract: 023100
 8 Tract: 023200
 9 Tract: 023400
 10 Tract: 023501
 11 Tract: 023502
 12 Tract: 023600
 13 Tract: 024302
 14 Tract: 025700
 15 Tract: 025900
 16 Tract: 014300 Blocks: 1000 1004
 17 Tract: 016200 Blocks: 2000 3000-3001 4000-4001 5000-5001
 18 Tract: 016500 Blocks: 1000 4000
 19 Tract: 016800 Blocks: 1000-1001 3000-3003
 20 Tract: 016900 Blocks: 1000 2000 3000-3001 5000 6000
 21 Tract: 017000 Blocks: 1001 2000-2001 3000-3001 4002
 22 Tract: 017200 Blocks: 2001 3000-3002 4001-4002
 23 Tract: 017500 Block: 7001
 24 Tract: 017700 Blocks: 1000-1001 2000 3000 3002 4000-4001 5000-5001
 25 6000 7000 8000
 26 Tract: 018200 Blocks: 1000-1001 2000-2001
 27 Tract: 019300 Blocks: 1000-1002 2000-2001 3000-3001 4000-4001 5001
 28 6000-6001
 29 Tract: 019400 Blocks: 2001 3000-3001 4000-4001
 30 Tract: 020500 Blocks: 1005-1011
 31 Tract: 021100 Blocks: 1006 3000-3001 5001 6000-6001 7000-7001
 32 Tract: 022301 Blocks: 2000-2001
 33 Tract: 022500 Blocks: 4000-4001
 34 Tract: 022900 Blocks: 2000 4000
 35 Tract: 023900 Blocks: 1000-1002 2000 2002
 36 Tract: 024200 Blocks: 0001 1000-1006 2000-2003 3006-3009 3011
 37 Tract: 024301 Blocks: 1000-1002 2000-2004
 38 Tract: 024500 Blocks: 4002 5000 6000
 39 Tract: 024900 Block: 1005
 40 Tract: 031100 Blocks: 0006 1007-1009
 41 33. Senate District 33.
 42 Within New York County
 43 Within Manhattan Borough:
 44 Tract: 016700
 45 Tract: 017100
 46 Tract: 017900
 47 Tract: 018300
 48 Tract: 018700
 49 Tract: 019100
 50 Tract: 019500
 51 Tract: 019900
 52 Tract: 021900
 53 Tract: 022302
 54 Tract: 023300
 55 Tract: 023700
 56 Tract: 024100

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S. 8185--A

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A. 9040--A

1 Tract: 024700
 2 Tract: 025100
 3 Tract: 025300
 4 Tract: 025500
 5 Tract: 026100
 6 Tract: 026300
 7 Tract: 026500
 8 Tract: 026700
 9 Tract: 026900
 10 Tract: 027100
 11 Tract: 027300
 12 Tract: 027500
 13 Tract: 027700
 14 Tract: 027900
 15 Tract: 028100
 16 Tract: 028300
 17 Tract: 028500
 18 Tract: 028700
 19 Tract: 029100
 20 Tract: 029300
 21 Tract: 029500
 22 Tract: 029700
 23 Tract: 029900
 24 Tract: 030300
 25 Tract: 030700
 26 Tract: 030900
 27 Tract: 016300 Blocks: 0001 1000-1002 3000
 28 Tract: 016900 Blocks: 4000-4001
 29 Tract: 017500 Blocks: 0001 1000-1004 2000 3000 4000-4001 5000-5001
 30 6000-6001 7000
 31 Tract: 017700 Block: 3001
 32 Tract: 019300 Block: 5000
 33 Tract: 020500 Blocks: 0001 1000-1004 2000-2003 3000-3002
 34 Tract: 021100 Blocks: 0001 1000-1005 1007 2000 4000-4001 5000
 35 Tract: 022301 Blocks: 0001 1000 2002 3000-3005 4000
 36 Tract: 022500 Blocks: 0001 1000-1006 2000-2001 3000-3003 5000-5001
 37 Tract: 022900 Blocks: 0001 1000-1001 2001 3000-3001 4001 5000-5005
 38 Tract: 023900 Block: 2001
 39 Tract: 024301 Blocks: 3000-3002
 40 Tract: 024500 Blocks: 1000-1001 2000-2001 3000-3001 4000-4001
 41 5001-5003 6001 7000
 42 Tract: 024900 Blocks: 1000-1004
 43 Tract: 031100 Blocks: 0001-0005 1000-1006
 44 34. Senate District 34.
 45 Within Bronx County
 46 Within Bronx Borough:
 47 Tract: 000200
 48 Tract: 000400
 49 Tract: 001600
 50 Tract: 001904
 51 Tract: 002001
 52 Tract: 002002
 53 Tract: 002400
 54 Tract: 002800
 55 Tract: 003800
 56 Tract: 004001

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S. 8185--A

165

A. 9040--A

1 Tract: 004200
2 Tract: 004400
3 Tract: 004600
4 Tract: 004800
5 Tract: 005001
6 Tract: 005002
7 Tract: 005200
8 Tract: 005400
9 Tract: 005600
10 Tract: 006000
11 Tract: 006200
12 Tract: 006400
13 Tract: 006800
14 Tract: 007000
15 Tract: 007400
16 Tract: 007600
17 Tract: 007700
18 Tract: 007800
19 Tract: 008300
20 Tract: 008400
21 Tract: 008500
22 Tract: 008600
23 Tract: 008700
24 Tract: 008900
25 Tract: 009301
26 Tract: 009302
27 Tract: 009800
28 Tract: 011502
29 Tract: 011701
30 Tract: 011702
31 Tract: 011900
32 Tract: 012101
33 Tract: 012102
34 Tract: 012300
35 Tract: 012500
36 Tract: 012701
37 Tract: 012901
38 Tract: 013100
39 Tract: 013300
40 Tract: 013500
41 Tract: 015700
42 Tract: 015900
43 Tract: 016100
44 Tract: 021001
45 Tract: 021002
46 Tract: 021200
47 Tract: 021601
48 Tract: 021602
49 Tract: 021800
50 Tract: 035900
51 Tract: 000100 Block: 0001
52 Tract: 007200 Blocks: 1000-1003 2000-2002 3000-3001 3004 4000
53 Tract: 007500 Blocks: 1000 2000-2002 2004-2008 3000 4000-4001
54 Tract: 007900 Blocks: 1000-1003 2000-2001 3000-3002 5000 6000
55 Tract: 009000 Blocks: 0002-0003 1000-1010 3000-3001 4000-4003 5000
56 Tract: 009200 Blocks: 3004 3006 5002 5004

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S. 8185--A

166

A. 9040--A

1 Tract: 009600 Blocks: 1006-1008 2008 2017-2019
2 Tract: 014300 Blocks: 1000-1001 1004-1006
3 Tract: 014500 Blocks: 1001 4000-4002
4 Tract: 014900 Blocks: 3000-3002
5 Tract: 015100 Blocks: 1003 2000-2004 3001-3003 4000-4005
6 Tract: 015300 Blocks: 1001 1003-1005 1007-1011 2000-2001 3000-3002
7 Tract: 015500 Blocks: 2000-2002 2004-2005
8 Tract: 018501 Blocks: 1000-1004 1006
9 Tract: 018502 Blocks: 1000-1001 2000-2005 3000-3002 4000-4002
10 Tract: 022000 Blocks: 1006-1008 1010-1013 2000
11 Tract: 024000 Blocks: 1005 1007-1009 3003-3006
12 Tract: 036100 Blocks: 1000 2000-2002 3000-3002
13 Tract: 036300 Blocks: 2000 3000-3002 4000-4008 5000-5002 6007
14 Tract: 036501 Blocks: 2002-2003 3002
15 Tract: 036502 Blocks: 1000-1004
16 Tract: 036700 Blocks: 1001-1004
17 35. Senate District 35.
18 Within Bronx County
19 Within Bronx Borough:
20 Tract: 014701
21 Tract: 014702
22 Tract: 016300
23 Tract: 016500
24 Tract: 016700
25 Tract: 016900
26 Tract: 017100
27 Tract: 017702
28 Tract: 022703
29 Tract: 022901
30 Tract: 022902
31 Tract: 023100
32 Tract: 023302
33 Tract: 023501
34 Tract: 023502
35 Tract: 023702
36 Tract: 023703
37 Tract: 023704
38 Tract: 023900
39 Tract: 024100
40 Tract: 024502
41 Tract: 024700
42 Tract: 024900
43 Tract: 025100
44 Tract: 025300
45 Tract: 025500
46 Tract: 025700
47 Tract: 026100
48 Tract: 026300
49 Tract: 026500
50 Tract: 026701
51 Tract: 026702
52 Tract: 026900
53 Tract: 027300
54 Tract: 027700
55 Tract: 028300
56 Tract: 036901

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S. 8185--A

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A. 9040--A

1 Tract: 036902
 2 Tract: 037100
 3 Tract: 037300
 4 Tract: 037504
 5 Tract: 037900
 6 Tract: 038100
 7 Tract: 038301
 8 Tract: 038303
 9 Tract: 038304
 10 Tract: 038500
 11 Tract: 038700
 12 Tract: 039100
 13 Tract: 039500
 14 Tract: 039901
 15 Tract: 039902
 16 Tract: 040100
 17 Tract: 040302
 18 Tract: 040303
 19 Tract: 040304
 20 Tract: 040501
 21 Tract: 014500 Blocks: 1000 2000 3000-3001 4003
 22 Tract: 014900 Blocks: 1000-1002 2000-2001
 23 Tract: 015100 Blocks: 1000-1002 3000
 24 Tract: 015300 Blocks: 1000 1002 1006
 25 Tract: 015500 Blocks: 1000 2003
 26 Tract: 017701 Blocks: 2000 3000 3002
 27 Tract: 017902 Block: 1000
 28 Tract: 022000 Blocks: 1000-1005 1009
 29 Tract: 022500 Blocks: 1000-1001 2000-2004 3000-3002 4000 4003
 30 Tract: 022702 Block: 1006
 31 Tract: 023000 Block: 1001
 32 Tract: 023301 Blocks: 1002 2000-2001
 33 Tract: 023600 Blocks: 1001-1002 2001-2005
 34 Tract: 024000 Blocks: 1000-1003 1006 2000-2001 3000-3002
 35 Tract: 024501 Blocks: 2000-2001 4000
 36 Tract: 027900 Blocks: 1002-1004 2001 3000-3001
 37 Tract: 028500 Blocks: 4000-4001 4004-4008
 38 Tract: 028700 Blocks: 1001-1004 2000 3000-3001
 39 Tract: 028900 Blocks: 1000-1005 2000 3001-3006 4000-4001
 40 Tract: 033400 Blocks: 1022 1027-1032
 41 Tract: 036100 Blocks: 4000 5000
 42 Tract: 036300 Blocks: 1000-1001 6000-6006
 43 Tract: 036501 Blocks: 1000-1001 2000-2001 3000-3001
 44 Tract: 036502 Blocks: 2000-2005
 45 Tract: 036700 Blocks: 1000 2000-2001
 46 Tract: 038900 Blocks: 1003-1004 2001-2002 3002-3005 4000 5000-5001
 47 Tract: 039300 Blocks: 1001 2000-2002 3000 4000 5000 6000-6002
 48 Tract: 039700 Blocks: 1007 1014-1016 2000-2002
 49 Tract: 040502 Blocks: 1000 2000 3000-3001 4001 5000 6000
 50 Tract: 040701 Blocks: 1000-1002 3000-3001
 51 Tract: 040702 Blocks: 3002-3003 4002 5000
 52 36. Senate District 36.
 53 Within Bronx County
 54 Within Bronx Borough:
 55 Tract: 011000
 56 Tract: 011800

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S. 8185--A

168

A. 9040--A

1 Tract: 013000
2 Tract: 013200
3 Tract: 013800
4 Tract: 014400
5 Tract: 015200
6 Tract: 015800
7 Tract: 016000
8 Tract: 016200
9 Tract: 016400
10 Tract: 016600
11 Tract: 018400
12 Tract: 019400
13 Tract: 020000
14 Tract: 020200
15 Tract: 020400
16 Tract: 020601
17 Tract: 022401
18 Tract: 022403
19 Tract: 022404
20 Tract: 022800
21 Tract: 023200
22 Tract: 023800
23 Tract: 024400
24 Tract: 024600
25 Tract: 024800
26 Tract: 025000
27 Tract: 025200
28 Tract: 025400
29 Tract: 025600
30 Tract: 026400
31 Tract: 026601
32 Tract: 026602
33 Tract: 027401
34 Tract: 027402
35 Tract: 028400
36 Tract: 028600
37 Tract: 028800
38 Tract: 029301
39 Tract: 029302
40 Tract: 029500
41 Tract: 029600
42 Tract: 029700
43 Tract: 030000
44 Tract: 030100
45 Tract: 030701
46 Tract: 030900
47 Tract: 031200
48 Tract: 031400
49 Tract: 031600
50 Tract: 031800
51 Tract: 031900
52 Tract: 032300
53 Tract: 032400
54 Tract: 032600
55 Tract: 032800
56 Tract: 033000

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S. 8185--A

169

A. 9040--A

1 Tract: 033201
 2 Tract: 033202
 3 Tract: 033500
 4 Tract: 033700
 5 Tract: 034300
 6 Tract: 034500
 7 Tract: 035100
 8 Tract: 041500
 9 Tract: 043501
 10 Tract: 043502
 11 Tract: 043503
 12 Tract: 044901
 13 Tract: 044902
 14 Tract: 045101
 15 Tract: 045102
 16 Tract: 050400
 17 Tract: 051601
 18 Tract: 051602
 19 Tract: 007200 Blocks: 3002-3003
 20 Tract: 009000 Blocks: 0001 2000-2020
 21 Tract: 009200 Blocks: 1000-1007 2000-2001 3000-3005 4000-4001
 22 5000-5001 5003
 23 Tract: 009600 Blocks: 1000-1005 2000-2007 2009-2016 2020-2025
 24 Tract: 022200 Blocks: 1000-1002 2001 3000-3005 4000-4001
 25 Tract: 023000 Blocks: 1000 1002-1007 2000-2004
 26 Tract: 023600 Blocks: 1000 2000
 27 Tract: 024000 Block: 1004
 28 Tract: 027600 Blocks: 0002 1000-1004 1008-1013 1015-1027
 29 Tract: 027900 Blocks: 1000-1001 2000 4000-4001 5000 6000
 30 Tract: 028100 Blocks: 1000-1001 2000-2001 3001-3002
 31 Tract: 028500 Blocks: 1000-1001 2000 3000-3002 4002-4003
 32 Tract: 028700 Blocks: 1000 1005
 33 Tract: 028900 Blocks: 3000 3005
 34 Tract: 030202 Blocks: 2000-2001
 35 Tract: 031000 Blocks: 1000-1011 2001-2004 2006-2014 3000-3009
 36 Tract: 033400 Blocks: 1008-1021 1023-1026
 37 Tract: 033601 Block: 1002
 38 Tract: 035000 Block: 2005
 39 Tract: 036000 Blocks: 2000-2003 3007-3008
 40 Tract: 038900 Blocks: 1000-1002 2000 3000-3001
 41 Tract: 039300 Block: 1000
 42 Tract: 039700 Blocks: 1000-1006 1008-1013
 43 Tract: 040502 Blocks: 4000 6001
 44 Tract: 040701 Blocks: 2000-2001
 45 Tract: 040702 Blocks: 1000-1002 2000-2003 3000-3001 4000-4001
 46 Tract: 040900 Blocks: 1002-1003 1005-1007 2000-2002
 47 Tract: 041100 Blocks: 1003-1004 2000-2003 3000-3002
 48 Tract: 041300 Blocks: 1000-1005 2000-2001 3000-3002 4002-4004 5000
 49 6000-6001 7000-7003
 50 Tract: 041800 Blocks: 1005 1007-1008
 51 Tract: 042100 Blocks: 2000 3000 4000 5000
 52 Tract: 042500 Blocks: 3002-3003 3006-3007
 53 Tract: 043101 Blocks: 1000-1002 2000 3000
 54 Tract: 045600 Blocks: 2000 2006 3000-3025
 55 Tract: 046203 Blocks: 3000 3003-3004
 56 Tract: 046209 Blocks: 1000 1012-1013

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S. 8185--A

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A. 9040--A

1 Tract: 048401 Blocks: 2000-2001 2014
 2 Within Westchester County
 3 All of Pelham town
 4 Within Mount Vernon city:
 5 Tract: 004500
 6 Tract: 015100 Blocks: 1000-1026 2000-2021 3000-3016 4000-4006
 7 4015-4016
 8 37. Senate District 37.
 9 Within Westchester County
 10 All of Greenburgh town
 11 All of Mount Kisco town
 12 All of Mount Pleasant town
 13 All of New Castle town
 14 Within Yonkers city:
 15 Tract: 000101
 16 Tract: 000103
 17 Tract: 000104
 18 Tract: 000202
 19 Tract: 000203
 20 Tract: 000204
 21 Tract: 000205
 22 Tract: 000300
 23 Tract: 000401
 24 Tract: 000403
 25 Tract: 000404
 26 Tract: 000501
 27 Tract: 000502
 28 Tract: 000601
 29 Tract: 000602
 30 Tract: 000701
 31 Tract: 000702
 32 Tract: 000801
 33 Tract: 000802
 34 Tract: 000803
 35 Tract: 000900
 36 Tract: 001000
 37 Tract: 001101
 38 Tract: 001102
 39 Tract: 001200
 40 Tract: 001301
 41 Tract: 001302
 42 Tract: 001304
 43 Tract: 001305
 44 Tract: 001600
 45 Tract: 001701
 46 Tract: 001702
 47 Tract: 001800
 48 Tract: 001900
 49 Tract: 002300
 50 Within White Plains city:
 51 Tract: 009000 Blocks: 2011-2015 2028
 52 Tract: 009100 Blocks: 1000-1004 1006-1010 2005 3000-3012 3016-3018
 53 Within Yonkers city:
 54 Tract: 001401 Blocks: 1000-1010 2000-2009 3000-3013 4000-4010
 55 Tract: 001402 Blocks: 1000-1007 1010-1012 2000-2009 2013
 56 Tract: 001403 Blocks: 1000-1004 2000-2007 3000-3003 4002-4009

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S. 8185--A

171

A. 9040--A

1 Tract: 002000 Blocks: 1004 2001 3000-3005 3007-3009 4002-4023 4028
2 Tract: 002203 Blocks: 1003-1005
3 Tract: 002401 Blocks: 1006-1016
4 Tract: 002405 Blocks: 1003-1011 2000-2007 3000-3011 3013-3014
5 3017-3018
6 38. Senate District 38.
7 Within Bronx County
8 Within Bronx Borough:
9 Tract: 030201
10 Tract: 033602
11 Tract: 033801
12 Tract: 033802
13 Tract: 034000
14 Tract: 034200
15 Tract: 034400
16 Tract: 034800
17 Tract: 035600
18 Tract: 035800
19 Tract: 036400
20 Tract: 036800
21 Tract: 037000
22 Tract: 037200
23 Tract: 037400
24 Tract: 037600
25 Tract: 038000
26 Tract: 038200
27 Tract: 038600
28 Tract: 038800
29 Tract: 039000
30 Tract: 039200
31 Tract: 039400
32 Tract: 039600
33 Tract: 039800
34 Tract: 040400
35 Tract: 040600
36 Tract: 040800
37 Tract: 041400
38 Tract: 041900
39 Tract: 042000
40 Tract: 042200
41 Tract: 042300
42 Tract: 042400
43 Tract: 042600
44 Tract: 042800
45 Tract: 042901
46 Tract: 042902
47 Tract: 043000
48 Tract: 043102
49 Tract: 043400
50 Tract: 043600
51 Tract: 044200
52 Tract: 044400
53 Tract: 044800
54 Tract: 045800
55 Tract: 046000
56 Tract: 046204

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A. 9040--A

1 Tract: 046205
 2 Tract: 046206
 3 Tract: 046207
 4 Tract: 046208
 5 Tract: 048402
 6 Tract: 027600 Blocks: 0001 1005-1007 1014
 7 Tract: 028100 Block: 3000
 8 Tract: 030202 Blocks: 1000 3000-3001 4000-4001
 9 Tract: 031000 Blocks: 2000 2005
 10 Tract: 033400 Blocks: 1000-1007
 11 Tract: 033601 Blocks: 1000-1001 2000-2001 3000 4000-4002
 12 Tract: 035000 Blocks: 1000-1007 2000-2004
 13 Tract: 036000 Blocks: 1000-1004 3000-3006
 14 Tract: 040900 Blocks: 1000-1001 1004
 15 Tract: 041100 Blocks: 1000-1002
 16 Tract: 041300 Blocks: 4000-4001
 17 Tract: 041800 Blocks: 1000-1004 1006 1009 2000-2003 3000-3001 4000
 18 Tract: 042100 Blocks: 1000-1002 3001 5001-5005
 19 Tract: 042500 Blocks: 1000 2000 3000-3001 3004-3005 4000 5000-5001
 20 6000-6001 7000-7001
 21 Tract: 043101 Block: 4000
 22 Tract: 045600 Blocks: 1000-1005 2001-2005 2007
 23 Tract: 046203 Blocks: 1000 2000-2001 3001-3002 3005-3017
 24 Tract: 046209 Blocks: 1001-1011 1014-1017 2000-2004 3000-3001
 25 Tract: 048401 Blocks: 1000-1007 2002-2013 2015-2016 3000-3007
 26 Within Westchester County
 27 Within Mount Vernon city:
 28 Tract: 002600
 29 Tract: 002700
 30 Tract: 002800
 31 Tract: 002900
 32 Tract: 003000
 33 Tract: 003100
 34 Tract: 003200
 35 Tract: 003300
 36 Tract: 003400
 37 Tract: 003500
 38 Tract: 003600
 39 Tract: 003700
 40 Tract: 003800
 41 Tract: 003900
 42 Tract: 004001
 43 Tract: 004002
 44 Tract: 004100
 45 Tract: 004200
 46 Tract: 015100 Blocks: 4007-4014 4017-4018
 47 39. Senate District 39.
 48 Within Westchester County
 49 All of Eastchester town
 50 All of Harrison town
 51 All of Mamaroneck town
 52 All of New Rochelle city
 53 All of Rye city
 54 All of Rye town
 55 All of Scarsdale town
 56 Within Yonkers city:

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S. 8185--A

173

A. 9040--A

1 Tract: 001502
 2 Tract: 001503
 3 Tract: 001504
 4 Tract: 001505
 5 Tract: 002101
 6 Tract: 002103
 7 Tract: 002104
 8 Tract: 002105
 9 Tract: 002106
 10 Tract: 002107
 11 Tract: 002201
 12 Tract: 002202
 13 Tract: 002204
 14 Tract: 002402
 15 Tract: 002403
 16 Tract: 002404
 17 Tract: 001401 Blocks: 2010-2015 3014-3017
 18 Tract: 001402 Blocks: 1008-1009 1013 2010-2012
 19 Tract: 001403 Blocks: 4000-4001 4010
 20 Tract: 002000 Blocks: 1000-1003 1005-1009 2000 2002-2004 3006 4000-4001
 21 4024-4027
 22 Tract: 002203 Blocks: 1000-1002
 23 Tract: 002401 Blocks: 1000-1005 1017
 24 Tract: 002405 Blocks: 1000-1002 3012 3015-3016
 25 40. Senate District 40.
 26 Within Rockland County
 27 All of Clarkstown town
 28 All of Orangetown town
 29 All of Ramapo town
 30 Within Westchester County
 31 All of Ossining town
 32 41. Senate District 41.
 33 Within Dutchess County
 34 All of Beacon city
 35 All of Fishkill town
 36 Within Orange County
 37 All of Blooming Grove town
 38 All of Cornwall town
 39 All of Hamptonburgh town
 40 All of Highlands town
 41 All of Middletown city
 42 All of Mount Hope town
 43 All of New Windsor town
 44 All of Newburgh city
 45 All of Newburgh town
 46 All of Tuxedo town
 47 All of Wallkill town
 48 All of Woodbury town
 49 Within Putnam County
 50 All of Philipstown town
 51 Within Rockland County
 52 All of Haverstraw town
 53 All of Stony Point town
 54 42. Senate District 42.
 55 Within Putnam County
 56 All of Carmel town

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174

A. 9040--A

1 All of Kent town
 2 All of Patterson town
 3 All of Putnam Valley town
 4 All of Southeast town
 5 Within Westchester County
 6 All of Bedford town
 7 All of Cortlandt town
 8 All of Lewisboro town
 9 All of North Castle town
 10 All of North Salem town
 11 All of Peekskill city
 12 All of Pound Ridge town
 13 All of Somers town
 14 All of Yorktown town
 15 Within White Plains city:
 16 Tract: 008801
 17 Tract: 008802
 18 Tract: 008901
 19 Tract: 008902
 20 Tract: 009201
 21 Tract: 009202
 22 Tract: 009300
 23 Tract: 009400
 24 Tract: 009500
 25 Tract: 009600
 26 Tract: 009701
 27 Tract: 009702
 28 Tract: 009703
 29 Tract: 009000 Blocks: 1000-1007 2000-2010 2016-2027 2029-2031
 30 Tract: 009100 Blocks: 1005 1011-1013 2000-2004 2006-2022 3013-3015
 31 43. Senate District 43.
 32 Within Columbia County
 33 All of Ancram town
 34 All of Austerlitz town
 35 All of Canaan town
 36 All of Chatham town
 37 All of Claverack town
 38 All of Copake town
 39 All of Gallatin town
 40 All of Ghent town
 41 All of Hillsdale town
 42 All of New Lebanon town
 43 Within Dutchess County
 44 All of Amenia town
 45 All of Beekman town
 46 All of Clinton town
 47 All of Dover town
 48 All of East Fishkill town
 49 All of Hyde Park town
 50 All of LaGrange town
 51 All of North East town
 52 All of Pawling town
 53 All of Pine Plains town
 54 All of Pleasant Valley town
 55 All of Poughkeepsie city
 56 All of Poughkeepsie town

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S. 8185--A

175

A. 9040--A

1 All of Stanford town
 2 All of Union Vale town
 3 All of Wappinger town
 4 All of Washington town
 5 Within Rensselaer County
 6 All of Berlin town
 7 All of Brunswick town
 8 All of Grafton town
 9 All of Hoosick town
 10 All of Nassau town
 11 All of Petersburg town
 12 All of Pittstown town
 13 All of Poestenkill town
 14 All of Sand Lake town
 15 All of Schaghticoke town
 16 All of Stephentown town
 17 44. Senate District 44.
 18 All of Delaware County
 19 All of Sullivan County
 20 Within Broome County
 21 All of Colesville town
 22 All of Fenton town
 23 All of Sanford town
 24 All of Windsor town
 25 Within Orange County
 26 All of Chester town
 27 All of Crawford town
 28 All of Deerpark town
 29 All of Goshen town
 30 All of Greenville town
 31 All of Minisink town
 32 All of Monroe town
 33 All of Montgomery town
 34 All of Palm Tree town
 35 All of Port Jervis city
 36 All of Warwick town
 37 All of Wawayanda town
 38 45. Senate District 45.
 39 Within Albany County
 40 All of Albany city
 41 All of Bethlehem town
 42 All of Coeymans town
 43 All of Cohoes city
 44 All of Colonie town
 45 All of Green Island town
 46 All of New Scotland town
 47 All of Watervliet city
 48 Within Rensselaer County
 49 All of East Greenbush town
 50 All of North Greenbush town
 51 All of Rensselaer city
 52 All of Schodack town
 53 46. Senate District 46.
 54 Within Rensselaer County
 55 All of Troy city
 56 Within Saratoga County

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A. 9040--A

1 All of Ballston town
 2 All of Clifton Park town
 3 All of Greenfield town
 4 All of Halfmoon town
 5 All of Malta town
 6 All of Milton town
 7 All of Saratoga Springs city
 8 All of Waterford town
 9 All of Wilton town
 10 Within Mechanicville city:
 11 Tract: 062200 Blocks: 1000-1008 1015-1023 2000-2001 2007-2016
 12 3000-3015
 13 Tract: 062300 Blocks: 1003 1008-1010 1013-1017 1019-1022 2000-2029
 14 Within Schenectady County
 15 All of Niskayuna town
 16 All of Schenectady city
 17 47. Senate District 47.
 18 All Of Clinton County
 19 All Of Essex County
 20 All Of Hamilton County
 21 All Of Warren County
 22 All Of Washington County
 23 Within Fulton County
 24 All of Bleecker town
 25 All of Broadalbin town
 26 All of Mayfield town
 27 All of Northampton town
 28 All of Perth town
 29 Within Saratoga County
 30 All of Charlton town
 31 All of Corinth town
 32 All of Day town
 33 All of Edinburg town
 34 All of Galway town
 35 All of Hadley town
 36 All of Moreau town
 37 All of Northumberland town
 38 All of Providence town
 39 All of Saratoga town
 40 All of Stillwater town
 41 Within Mechanicville city:
 42 Tract: 062200 Blocks: 1009-1014 2002-2006
 43 Tract: 062300 Blocks: 1000-1002 1004-1007 1011-1012 1018
 44 48. Senate District 48.
 45 All Of Greene County
 46 All Of Ulster County
 47 Within Albany County
 48 All of Berne town
 49 All of Guilderland town
 50 All of Knox town
 51 All of Rensselaerville town
 52 All of Westerlo town
 53 Within Columbia County
 54 All of Clermont town
 55 All of Germantown town
 56 All of Greenport town

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A. 9040--A

1 All of Hudson city
2 All of Kinderhook town
3 All of Livingston town
4 All of Stockport town
5 All of Stuyvesant town
6 All of Taghkanic town
7 Within Dutchess County
8 All of Milan town
9 All of Red Hook town
10 All of Rhinebeck town
11 49. Senate District 49.
12 All of Oswego County
13 Within Madison County
14 All of Lenox town
15 All of Oneida city
16 All of Sullivan town
17 Within Oneida County
18 All of Annsville town
19 All of Ava town
20 All of Boonville town
21 All of Camden town
22 All of Florence town
23 All of Floyd town
24 All of Forestport town
25 All of Lee town
26 All of Marcy town
27 All of Remsen town
28 All of Rome city
29 All of Steuben town
30 All of Trenton town
31 All of Vernon town
32 All of Verona town
33 All of Vienna town
34 All of Western town
35 All of Westmoreland town
36 All of Whitestown town
37 Within Onondaga County
38 All of Cicero town
39 All of Lysander town
40 Within Oswego County
41 All of Albion town
42 All of Amboy town
43 All of Boylston town
44 All of Constantia town
45 All of County subdivisions not defined
46 All of Fulton city
47 All of Granby town
48 All of Hannibal town
49 All of Hastings town
50 All of Mexico town
51 All of Minetto town
52 All of New Haven town
53 All of Orwell town
54 All of Oswego city
55 All of Oswego town
56 All of Palermo town

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A. 9040--A

1 All of Parish town
2 All of Redfield town
3 All of Richland town
4 All of Sandy Creek town
5 All of Schroepfel town
6 All of Scriba town
7 All of Volney town
8 All of West Monroe town
9 All of Williamstown town
10 50. Senate District 50.
11 All of Franklin County
12 All of Jefferson County
13 All of Lewis County
14 All of St. Lawrence County
15 Within Herkimer County
16 All of Frankfort town
17 All of Herkimer town
18 All of Newport town
19 All of Ohio town
20 All of Russia town
21 All of Schuyler town
22 All of Webb town
23 51. Senate District 51.
24 All of Chenango County
25 All of Montgomery County
26 All of Otsego County
27 All of Schoharie County
28 Within Fulton County
29 All of Caroga town
30 All of Ephratah town
31 All of Gloversville city
32 All of Johnstown city
33 All of Johnstown town
34 All of Oppenheim town
35 All of Stratford town
36 Within Herkimer County
37 All of Columbia town
38 All of Danube town
39 All of Fairfield town
40 All of German Flatts town
41 All of Litchfield town
42 All of Little Falls city
43 All of Little Falls town
44 All of Manheim town
45 All of Norway town
46 All of Salisbury town
47 All of Stark town
48 All of Warren town
49 All of Winfield town
50 Within Schenectady County
51 All of Duanesburg town
52 All of Glenville town
53 All of Princetown town
54 All of Rotterdam town
55 52. Senate District 52.
56 Within Cayuga County

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A. 9040--A

1 All of Auburn city
 2 All of Owasco town
 3 All of Sennett town
 4 Within Onondaga County
 5 All of Camillus town
 6 All of Clay town
 7 All of De Witt town
 8 All of Elbridge town
 9 All of Geddes town
 10 All of Manlius town
 11 All of Marcellus town
 12 All of Salina town
 13 All of Skaneateles town
 14 All of Van Buren town
 15 Within Syracuse city:
 16 Tract: 000100
 17 Tract: 000200
 18 Tract: 000300
 19 Tract: 000400
 20 Tract: 000501
 21 Tract: 000600
 22 Tract: 000700
 23 Tract: 000800
 24 Tract: 000900
 25 Tract: 001400
 26 Tract: 001500
 27 Tract: 002000
 28 Tract: 002101
 29 Tract: 002700
 30 Tract: 002901
 31 Tract: 003000
 32 Tract: 003800
 33 Tract: 004800
 34 Tract: 001000 Blocks: 1000-1002 2000-2005 2012-2013 3000-3013
 35 4000-4002 4004 4006
 36 Tract: 001600 Blocks: 1000-1002 2000-2001
 37 Tract: 002300 Blocks: 1000-1008 2000-2034 2036-2037 2040-2021
 38 2043-2044
 39 Tract: 003200 Blocks: 1000-1025 1028-1032 2001
 40 Tract: 003900 Blocks: 1000-1010 2000-2012 3003-3008
 41 Tract: 004000 Blocks: 1000-1010 1016-1017
 42 Tract: 004900 Blocks: 1000-1016 2000-2005 2007-2009
 43 Tract: 005000 Blocks: 1001-1012 1016
 44 Tract: 013200 Blocks: 1002-1003 1009-1011 2001-2002 2032-2033
 45 53. Senate District 53.
 46 All Of Tompkins County
 47 Within Broome County
 48 All of Barker town
 49 All of Binghamton city
 50 All of Binghamton town
 51 All of Chenango town
 52 All of Conklin town
 53 All of Dickinson town
 54 All of Kirkwood town
 55 All of Lisle town
 56 All of Maine town

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A. 9040--A

1 All of Nanticoke town
2 All of Triangle town
3 All of Union town
4 All of Vestal town
5 Within Cortland County
6 All of Cincinnatus town
7 All of Cuyler town
8 All of Freetown town
9 All of Harford town
10 All of Lapeer town
11 All of Marathon town
12 All of Solon town
13 All of Taylor town
14 All of Truxton town
15 All of Virgil town
16 All of Willet town
17 Within Tioga County
18 All of Newark Valley town
19 All of Owego town
20 All of Richford town
21 Within Tompkins County
22 All of Caroline town
23 All of Danby town
24 All of Dryden town
25 All of Enfield town
26 All of Groton town
27 All of Ithaca city
28 All of Ithaca town
29 All of Lansing town
30 All of Newfield town
31 All of Ulysses town
32 All Of Genesee County
33 54. Senate District 54.
34 All Of Ontario County
35 All Of Wayne County
36 Within Cayuga County
37 All of Brutus town
38 All of Cato town
39 All of Conquest town
40 All of County subdivisions not defined
41 All of Ira town
42 All of Mentz town
43 All of Montezuma town
44 All of Sterling town
45 All of Throop town
46 All of Victory town
47 Within Genesee County
48 All of Alabama town
49 All of Alexander town
50 All of Batavia city
51 All of Batavia town
52 All of Bergen town
53 All of Bethany town
54 All of Byron town
55 All of Darien town
56 All of Elba town

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A. 9040--A

1 All of Le Roy town
 2 All of Oakfield town
 3 All of Pavilion town
 4 All of Pembroke town
 5 All of Stafford town
 6 All of Tonawanda Reservation
 7 Within Livingston County
 8 All of Avon town
 9 All of Caledonia town
 10 All of Genesee town
 11 All of Groveland town
 12 All of Lima town
 13 All of Livonia town
 14 All of York town
 15 Within Ontario County
 16 All of Bristol town
 17 All of Canadice town
 18 All of Canandaigua city
 19 All of Canandaigua town
 20 All of East Bloomfield town
 21 All of Farmington town
 22 All of Geneva city
 23 All of Geneva town
 24 All of Gorham town
 25 All of Hopewell town
 26 All of Manchester town
 27 All of Naples town
 28 All of Phelps town
 29 All of Richmond town
 30 All of Seneca town
 31 All of South Bristol town
 32 All of Victor town
 33 All of West Bloomfield town
 34 Within Wayne County
 35 All of Arcadia town
 36 All of Butler town
 37 All of County subdivisions not defined
 38 All of Galen town
 39 All of Huron town
 40 All of Lyons town
 41 All of Macedon town
 42 All of Marion town
 43 All of Ontario town
 44 All of Palmyra town
 45 All of Rose town
 46 All of Savannah town
 47 All of Sodus town
 48 All of Walworth town
 49 All of Williamson town
 50 All of Wolcott town
 51 55. Senate District 55.
 52 Within Cortland County
 53 All of Cortland city
 54 All of Cortlandville town
 55 All of Homer town
 56 All of Preble town

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182

A. 9040--A

1 All of Scott town
2 Within Madison County
3 All of Brookfield town
4 All of Cazenovia town
5 All of DeRuyter town
6 All of Eaton town
7 All of Fenner town
8 All of Georgetown town
9 All of Hamilton town
10 All of Lebanon town
11 All of Lincoln town
12 All of Madison town
13 All of Nelson town
14 All of Smithfield town
15 All of Stockbridge town
16 Within Oneida County
17 All of Augusta town
18 All of Bridgewater town
19 All of Deerfield town
20 All of Kirkland town
21 All of Marshall town
22 All of New Hartford town
23 All of Paris town
24 All of Sangerfield town
25 All of Utica city
26 Within Onondaga County
27 All of Fabius town
28 All of LaFayette town
29 All of Onondaga Nation Reservation
30 All of Onondaga town
31 All of Otisco town
32 All of Pompey town
33 All of Spafford town
34 All of Tully town
35 Within Syracuse city:
36 Tract: 001701
37 Tract: 001702
38 Tract: 001800
39 Tract: 001900
40 Tract: 002400
41 Tract: 003400
42 Tract: 003500
43 Tract: 003601
44 Tract: 003602
45 Tract: 004200
46 Tract: 004301
47 Tract: 004302
48 Tract: 004401
49 Tract: 004500
50 Tract: 004600
51 Tract: 005100
52 Tract: 005200
53 Tract: 005300
54 Tract: 005400
55 Tract: 005500
56 Tract: 005601

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A. 9040--A

1 Tract: 005602
2 Tract: 005700
3 Tract: 005800
4 Tract: 005900
5 Tract: 006000
6 Tract: 006101
7 Tract: 006102
8 Tract: 006103
9 Tract: 001000 Blocks: 1003-1008 2006-2011 2014 4005
10 Tract: 001600 Blocks: 1003-1004 2002-2013
11 Tract: 002300 Blocks: 2035 2038 2039 2042
12 Tract: 003200 Blocks: 1026-1027 1033-1057 2000 2002-2030
13 Tract: 003900 Blocks: 3000-3002 3009-3012
14 Tract: 004000 Blocks: 1011-1015 1018-1019
15 Tract: 004900 Blocks: 2006 2010-2011
16 Tract: 005000 Blocks: 1000 1013-1015 1017-1030 2000-2020
17 56. Senate District 56.
18 Within Monroe County
19 All of East Rochester town
20 All of Irondequoit town
21 All of Penfield town
22 All of Perinton town
23 All of Pittsford town
24 All of Webster town
25 Within Rochester city:
26 Tract: 001000
27 Tract: 001600
28 Tract: 002900
29 Tract: 003000
30 Tract: 003101
31 Tract: 003102
32 Tract: 003300
33 Tract: 003500
34 Tract: 003600
35 Tract: 003700
36 Tract: 004702
37 Tract: 004800
38 Tract: 004900
39 Tract: 005200
40 Tract: 005400
41 Tract: 005500
42 Tract: 005600
43 Tract: 005700
44 Tract: 005800
45 Tract: 005900
46 Tract: 006000
47 Tract: 006100
48 Tract: 007600
49 Tract: 007700
50 Tract: 007801
51 Tract: 007802
52 Tract: 007900
53 Tract: 008000
54 Tract: 008100
55 Tract: 008200
56 Tract: 008301

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184

A. 9040--A

1 Tract: 008400
 2 Tract: 980100
 3 Tract: 000700 Blocks: 2000-2019
 4 Tract: 001300 Blocks: 1000-1002
 5 Tract: 003200 Blocks: 1000-1016 2002 2004-2011 2014-2016
 6 Tract: 003400 Blocks: 1000-1005 2000-2001
 7 Tract: 003806 Blocks: 1000 2000-2020 3000-3003 4000-4016 4018
 8 5000-5001 6000 6002
 9 Tract: 003807 Blocks: 1004-1006 1008-1010 1012-1015 1018-1031
 10 Tract: 004602 Blocks: 1000-1003 3000
 11 Tract: 004701 Blocks: 1000-1001 1016-1033 2000-2014 3000-3004
 12 Tract: 005000 Block: 1000
 13 Tract: 005100 Blocks: 1000-1006 2002 2004-2006
 14 Tract: 008500 Blocks: 3000-3001
 15 Tract: 009301 Blocks: 1000-1001 1007-1010 1013-1014 2000-2012
 16 2015-2019 3000-3016
 17 Tract: 009302 Blocks: 1000-1003 1006-1030
 18 Tract: 009402 Blocks: 1044-1048 1054 1057-1059
 19 Tract: 010500 Blocks: 1005 1010-1012
 20 Tract: 010601 Blocks: 3000 3009 4000 4004 4010
 21 Tract: 010700 Blocks: 1006-1007
 22 Tract: 010800 Blocks: 1004-1006 1010 2004-2005 3003-3004 3014-3015
 23 4014
 24 Tract: 010901 Blocks: 1000 1004-1005
 25 Tract: 010902 Blocks: 1001 1005-1006 1008 2007-2010 3015-3017 4004
 26 4007
 27 Tract: 011000 Blocks: 1001 1009-1010 3017-3018 4000 4004-4005 4018
 28 Tract: 011100 Blocks: 2005-2006 2012-2013 2017 2022-2023 2029-2030
 29 2038
 30 57. Senate District 57.
 31 Within Monroe County
 32 All of Brighton town
 33 All of Gates town
 34 All of Greece town
 35 All of Henrietta town
 36 Within Rochester city:
 37 Tract: 000200
 38 Tract: 001800
 39 Tract: 001900
 40 Tract: 002000
 41 Tract: 002100
 42 Tract: 002200
 43 Tract: 002300
 44 Tract: 002400
 45 Tract: 002700
 46 Tract: 003900
 47 Tract: 004000
 48 Tract: 004100
 49 Tract: 006200
 50 Tract: 006300
 51 Tract: 006400
 52 Tract: 006500
 53 Tract: 006600
 54 Tract: 006700
 55 Tract: 006800
 56 Tract: 006900

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1 Tract: 007000
 2 Tract: 007100
 3 Tract: 007500
 4 Tract: 008600
 5 Tract: 008702
 6 Tract: 008801
 7 Tract: 009200
 8 Tract: 009401
 9 Tract: 009403
 10 Tract: 009404
 11 Tract: 009500
 12 Tract: 009601
 13 Tract: 009602
 14 Tract: 009605
 15 Tract: 980200
 16 Tract: 000700 Blocks: 1000-1005
 17 Tract: 001300 Blocks: 1003-1005
 18 Tract: 003200 Blocks: 2000-2003 2012-2013
 19 Tract: 003400 Blocks: 1006-1007 2002-2007
 20 Tract: 003806 Blocks: 4017 6001
 21 Tract: 003807 Blocks: 1000-1003 1007 1011 1016 1017 1032 2000-2005
 22 3000-3024 3027-3028
 23 Tract: 004602 Blocks: 2000-2001 3001-3006
 24 Tract: 004701 Blocks: 1002-1015
 25 Tract: 005000 Blocks: 1001-1006 2000-2013
 26 Tract: 005100 Blocks: 2000-2001 2003
 27 Tract: 008500 Blocks: 1000-1014 2000-2014 3002-3030
 28 Tract: 009301 Blocks: 1002-1006 1011-1012 1015-1019 2013-2014
 29 Tract: 009302 Blocks: 1004-1005
 30 Tract: 009402 Blocks: 1000-1043 1049-1053 1055-1056 1060-1061
 31 Tract: 014602 Blocks: 2000-2001 2007-2010
 32 Tract: 980000 Blocks: 1002-1004 1006-1008 1014-1017
 33 58. Senate District 58.
 34 All of Allegany County
 35 All of Cattaraugus County
 36 All of Chautauqua County
 37 All of Wyoming County
 38 Within Erie County
 39 All of Brant town
 40 All of Cattaraugus Reservation
 41 All of Colden town
 42 All of Collins town
 43 All of Concord town
 44 All of Holland town
 45 All of North Collins town
 46 All of Sardinia town
 47 All of Wales town
 48 59. Senate District 59.
 49 All of Chemung County
 50 All of Schuyler County
 51 All of Seneca County
 52 All of Steuben County
 53 All of Yates County
 54 Within Cayuga County
 55 All of Aurelius town
 56 All of Fleming town

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A. 9040--A

1 All of Genoa town
2 All of Ledyard town
3 All of Locke town
4 All of Moravia town
5 All of Niles town
6 All of Scipio town
7 All of Sempronius town
8 All of Springport town
9 All of Summerhill town
10 All of Venice town
11 Within Livingston County
12 All of Conesus town
13 All of Leicester town
14 All of Mount Morris town
15 All of North Dansville town
16 All of Nunda town
17 All of Ossian town
18 All of Portage town
19 All of Sparta town
20 All of Springwater town
21 All of West Sparta town
22 Within Tioga County
23 All of Barton town
24 All of Berkshire town
25 All of Candor town
26 All of Nichols town
27 All of Spencer town
28 All of Tioga town
29 60. Senate District 60.
30 Within Erie County
31 All of Grand Island town
32 All of Hamburg town
33 All of Tonawanda city
34 All of Tonawanda town
35 Within Buffalo city:
36 Tract: 004901
37 Tract: 005000
38 Tract: 005300
39 Tract: 005400
40 Tract: 005500
41 Tract: 005600
42 Tract: 005700
43 Tract: 005801
44 Tract: 005802
45 Tract: 005900
46 Tract: 006100
47 Tract: 006301
48 Tract: 006302
49 Tract: 006501
50 Tract: 006601
51 Tract: 006602
52 Tract: 006701
53 Tract: 006702
54 Tract: 006901
55 Tract: 006903
56 Tract: 006904

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A. 9040--A

1 Tract: 007000
 2 Tract: 007103
 3 Tract: 007104
 4 Tract: 016900
 5 Tract: 017100
 6 Tract: 980000
 7 Tract: 000110 Blocks: 3009-3023 3055-3056
 8 Tract: 000500 Blocks: 1024-1043 1050-1053
 9 Tract: 004002 Blocks: 2001-2004 2006
 10 Tract: 004500 Blocks: 1010-1011 4000-4011 4014-4018 5000-5012
 11 Tract: 004800 Blocks: 1004-1007 2003-2004 2006-2014
 12 Tract: 004902 Blocks: 1002-1006 2001-2006 3000-3005
 13 Tract: 005100 Blocks: 2000-2003 3000-3005 4000-4003
 14 Tract: 005201 Blocks: 1000-1008 2000-2004 3000-3001 3005 4000-4006
 15 Tract: 006801 Blocks: 1000-1006 1009-1010
 16 Tract: 006802 Blocks: 1000-1005 2000-2007 2009 3000-3006
 17 Tract: 007202 Blocks: 1000-1018 1021-1022
 18 Tract: 016400 Blocks: 1019-1020
 19 Tract: 016500 Blocks: 1087 1095-1096 1108
 20 Tract: 017400 Blocks: 3013-3015
 21 Tract: 990000 Blocks: 0001-0004
 22 Within Lackawanna city:
 23 Tract: 017400 Blocks: 3006 3009-3012 3021
 24 Within Niagara County
 25 Within Niagara Falls city:
 26 Tract: 020100
 27 Tract: 020200
 28 Tract: 020300
 29 Tract: 020400
 30 Tract: 020500
 31 Tract: 020600
 32 Tract: 020700
 33 Tract: 020900
 34 Tract: 021000
 35 Tract: 021100
 36 Tract: 021200
 37 Tract: 021300
 38 Tract: 021400
 39 Tract: 021700
 40 Tract: 022000
 41 Tract: 022100
 42 Tract: 022200
 43 Tract: 022401
 44 Tract: 022300 Blocks: 1001-1013 2000-2014 3000-3025
 45 Tract: 022500 Blocks: 3004-3010
 46 61. Senate district 61.
 47 Within Erie County
 48 All of Alden town
 49 All of Aurora town
 50 All of Boston town
 51 All of Cheektowaga town
 52 All of Clarence town
 53 All of Eden town
 54 All of Elma town
 55 All of Evans town
 56 All of Lancaster town

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A. 9040--A

1 All of Marilla town
 2 All of Newstead town
 3 All of Orchard Park town
 4 All of Tonawanda Reservation
 5 All of West Seneca town
 6 62. Senate District 62.
 7 All Of Orleans County
 8 Within Monroe County
 9 All of Chili town
 10 All of Clarkson town
 11 All of Hamlin town
 12 All of Mendon town
 13 All of Ogden town
 14 All of Parma town
 15 All of Riga town
 16 All of Rush town
 17 All of Sweden town
 18 All of Wheatland town
 19 All of Cambria town
 20 Within Niagara County
 21 All of County subdivisions not defined
 22 All of Hartland town
 23 All of Lewiston town
 24 All of Lockport city
 25 All of Lockport town
 26 All of Newfane town
 27 All of Niagara town
 28 All of North Tonawanda city
 29 All of Pendleton town
 30 All of Porter town
 31 All of Royalton town
 32 All of Somerset town
 33 All of Tonawanda Reservation
 34 All of Tuscarora Nation Reservation
 35 All of Wheatfield town
 36 All of Wilson town
 37 Within Niagara Falls city:
 38 Tract: 022300 Block: 1000
 39 Tract: 022500 Blocks: 1010-1013 2000-2007 3000-3003
 40 Within Orleans County
 41 All of Albion town
 42 All of Barre town
 43 All of Carlton town
 44 All of Clarendon town
 45 All of County subdivisions not defined
 46 All of Gaines town
 47 All of Kendall town
 48 All of Murray town
 49 All of Ridgeway town
 50 All of Shelby town
 51 All of Yates town
 52 63. Senate district 63.
 53 Within Erie County
 54 All of Amherst town
 55 Within Buffalo city:
 56 Tract: 000200

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A. 9040--A

1 Tract: 000600
2 Tract: 000700
3 Tract: 000800
4 Tract: 000900
5 Tract: 001000
6 Tract: 001100
7 Tract: 001403
8 Tract: 001404
9 Tract: 001500
10 Tract: 001601
11 Tract: 001602
12 Tract: 001700
13 Tract: 001900
14 Tract: 002300
15 Tract: 002400
16 Tract: 002502
17 Tract: 002703
18 Tract: 002704
19 Tract: 002801
20 Tract: 002802
21 Tract: 002900
22 Tract: 003000
23 Tract: 003100
24 Tract: 003301
25 Tract: 003302
26 Tract: 003400
27 Tract: 003501
28 Tract: 003502
29 Tract: 003600
30 Tract: 003700
31 Tract: 003800
32 Tract: 003901
33 Tract: 004003
34 Tract: 004100
35 Tract: 004200
36 Tract: 004300
37 Tract: 004401
38 Tract: 004402
39 Tract: 004601
40 Tract: 004701
41 Tract: 004702
42 Tract: 005202
43 Tract: 007102
44 Tract: 016300
45 Tract: 016600
46 Tract: 016700
47 Tract: 016801
48 Tract: 016802
49 Tract: 017000
50 Tract: 980500
51 Within Lackawanna city:
52 Tract: 012300
53 Tract: 012400
54 Tract: 012501
55 Tract: 012502
56 Tract: 016200

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1 Within Buffalo city:
 2 Tract: 000110 Blocks: 1000-1006 2000-2005 3000-3008 3024-3054 3057
 3 Tract: 000500 Blocks: 1000-1023 1044-1049 1054-1057 2000-2019
 4 Tract: 004002 Blocks: 1000-1015 2000 2005
 5 Tract: 004500 Blocks: 1000-1009 2000-2009 3000-3015 4012-4013
 6 6000-6008
 7 Tract: 004800 Blocks: 1000-1003 2000-2002 2005 3000-3013
 8 Tract: 004902 Blocks: 1000-1001 2000
 9 Tract: 005100 Blocks: 1000-1013
 10 Tract: 005201 Blocks: 2005 3002-3004 3006-3009
 11 Tract: 006801 Blocks: 1007-1008 1011-1015
 12 Tract: 006802 Blocks: 2008 2010
 13 Tract: 007202 Blocks: 1019-1020
 14 Tract: 016400 Blocks: 1000-1018
 15 Tract: 016400 Blocks: 2000-2038 3000-3024 4000-4006 5000-5013
 16 Tract: 016500 Blocks: 1000-1086 1088-1094 1097-1099 1100-1107
 17 2000-2026
 18 Within Lackawanna city:
 19 Tract: 017400 Blocks: 1000-1022 2000-2016 3000-3008 3016-3020
 20 3023-3030 4000-4011
 21 § 125. Separability of senate districts. Each senate district created
 22 by this title shall be deemed a separate district for the purpose of
 23 apportionment of the entire state into senate districts. If one or more
 24 senate districts created by this title are judicially found to be inval-
 25 id or unenforceable for any reason, including but not limited to non-
 26 compliance with decisions and mandates of a court of competent jurisdic-
 27 tion, only the defective district or districts and those immediately
 28 adjacent or contiguous thereto shall be reapportioned. All other
 29 districts shall be deemed to be properly created.

TITLE III

MISCELLANEOUS

30
 31
 32 Section 126. Application.
 33 127. Construction.
 34 128. Saving clause.
 35 § 126. Application. For the purpose of filling vacancies occurring
 36 other than by the expiration of term in the offices of members of the
 37 senate and assembly elected at a general election in two thousand twen-
 38 ty, or at a special election held to fill a vacancy in the office of a
 39 member elected at said general election, the senate and assembly
 40 districts of this state, as existing immediately before the effective
 41 date of this article, shall continue to be respectively, the senate
 42 districts and assembly districts of the state.
 43 § 127. Construction. a. This article shall be liberally construed to
 44 effectuate the purposes thereof and to apportion and district this state
 45 in compliance with the requirements of law and shall supersede any
 46 inconsistent provision of law including but not limited to section three
 47 of chapter seventeen of the laws of two thousand twelve.
 48 b. It is intended that this article and the districts described there-
 49 in completely encompass all the area within the state. It is further
 50 intended that the apportionment and districting provided for in this
 51 article result in the creation of districts which are substantially
 52 equal in population and contain all inhabitants in this state, based on
 53 the Federal Census of two thousand twenty, as adjusted pursuant to the
 54 provisions of part XX of chapter fifty-seven of the laws of two thousand

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1 ten, as amended. It is also intended that no district shall include any
2 of the area included within the description of any other district.
3 c. The apportionment of assembly districts and senate districts shall
4 be deemed to be separate from each other. The invalidity of the
5 districts contained in one title of this article shall not affect or
6 require the redistricting provided by the other title of this article
7 when the provisions of such other title have been found to be valid by a
8 court of competent jurisdiction.
9 § 128. Saving clause. a. If the districts described in this article do
10 not carry out the purposes thereof, because of unintentional omission;
11 duplications; overlapping areas; erroneous nomenclature; lack of
12 adequate maps or descriptions of political subdivisions, wards, or other
13 divisions thereof, or of their boundary line; street closings, changes
14 in names of streets, or other changes of public places; alteration of
15 the boundary or courses of waters or waterways, filling in or lands
16 under water, accretion or other changes in shorelines; or alteration of
17 courses, rights of way, or lines of public utilities or other condi-
18 tions, then the state board of elections, at the request of any person
19 aggrieved thereby, or any candidate affected thereby shall, by order,
20 correct such omissions, overlaps, erroneous nomenclature, or other
21 defects in the description of districts so as to accomplish the purposes
22 and objectives of this article.
23 b. In promulgating such orders, the state board of elections, in addi-
24 tion to achieving equality in the population of districts and insuring
25 that all areas of the state are completely and accurately encompassed in
26 such districts, shall be guided by the following standards:
27 (1) Gaps in the description of any district shall be completed in a
28 manner which results in a total description of that district consonant
29 with the description of adjacent districts and in complete contiguity of
30 districts.
31 (2) Areas of the state included within the descriptions of more than
32 one district shall be allocated to the district having the lowest popu-
33 lation.
34 (3) Areas of the state not included within the descriptions of any
35 district shall be allocated to the adjacent district having the lowest
36 population.
37 (4) In the event that the area subject to corrected description or
38 allocation as provided in paragraph one, two or three of this subdivi-
39 sion is of such size or contains such population that its inclusion as a
40 unit in any district would result in substantial disparity in the size,
41 shape or population of such district, then the state board of elections
42 may allocate portions of such area to two or more districts.
43 (5) In any allocation of area or correction of descriptions made
44 pursuant to this section, the state board of elections shall, consistent
45 with the foregoing standards, preserve the contiguity and compactness of
46 districts and avoid the unnecessary division of political subdivisions.
47 c. Copies of such orders shall be filed by the state board of
48 elections in its own office and in the office of the affected boards of
49 election. A copy of each such order shall also be filed by the state
50 board with the legislative bill drafting commission to facilitate it in
51 performing its functions under section seventy-b of the public officers
52 law. In addition, a copy of such order shall be served upon the person
53 or candidate, if any, who instituted the application for such an order.
54 The state board of elections may adopt reasonable rules regulating the
55 procedure for applications for orders under this section in the manner
56 of serving and filing any notice or copy of orders relating thereto.

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1 d. Upon the filing of such an order, the description of any affected
 2 district shall be deemed to have been corrected in the manner provided
 3 in such order to the full extent as if such correction had been
 4 contained in the original description set forth in this article.

5 e. In furtherance of effectuating the provisions of subdivision d of
 6 this section, the legislative bill drafting commission, upon receipt
 7 from the state board of elections of an order promulgated pursuant to
 8 subdivision b of this section, and upon the approval of the temporary
 9 president of the senate and the speaker of the assembly, shall cause the
 10 description of a senate district or assembly district altered pursuant
 11 to any such order to be revised accordingly within its data base of the
 12 laws of the state of New York so that such altered district may be
 13 contained in a publication of the state law and be certified to as a
 14 correct transcript of the text of law relating thereto such district in
 15 the manner authorized by section seventy-b of the public officers law.

16 § 2. In order to provide for an orderly election of members of the
 17 legislature and in recognition of the constitutional mandate that legis-
 18 lative districts shall be created by law subject to judicial review
 19 under such reasonable regulations as the legislature may prescribe, it
 20 is hereby determined and declared that no order of the court invalidat-
 21 ing this act or part thereof shall be entered in a manner which will
 22 deprive the legislature of an opportunity to discharge its constitu-
 23 tional mandate. In any proceeding for judicial review of the provisions
 24 of this act, the determination of the court shall be embodied in a
 25 tentative order which shall become final thirty days after service of
 26 copies thereof upon the parties unless the court shall, in the interval,
 27 on application of any party, resettle its order.

28 § 3. If any clause, sentence, paragraph, section or part of this act
 29 shall be adjudged by any court of competent jurisdiction to be invalid,
 30 such judgment shall not affect, impair or invalidate the remainder ther-
 31 eof, but shall be confined in its operation to the clause, sentence,
 32 paragraph, section or part thereof directly involved in the controversy
 33 in which such judgment shall have been rendered.

34 § 4. Section 126 of the state law is REPEALED and a new section 126
 35 is added to read as follows:

36 § 126. Application. For the purpose of filling vacancies occurring
 37 other than by the expiration of term in the offices of members of the
 38 senate and assembly elected at a general election in two thousand twen-
 39 ty-two, the senate and assembly districts of this state, as described
 40 and set out in a chapter of the laws of two thousand twenty-two, amend-
 41 ing the state law relating to establishing assembly and senate
 42 districts, shall continue to be respectively, the senate districts and
 43 the assembly districts of the state.

44 § 5. This act shall take effect immediately, provided that the
 45 provisions of section four of this act shall take effect January 1,
 46 2023.

654

EXHIBIT G TO MOSKOWITZ AFFIRMATION -
2021-2022 N.Y. REG. SESS. LEG. BILLS
S.8197 AND A.9168 [654 - 667]

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S08197 Summary:

BILL NO S08197

SAME AS SAME AS UNI.

SPONSOR GIANARIS

COSPNR

MLTSPNR

Amd §§121 & 127, State L (as proposed in S.8185-A & A.9040-A)

Relates to assembly and senate districts.

S08197 Text:

STATE OF NEW YORK

S. 8197

A. 9168

SENATE - ASSEMBLY

February 1, 2022

IN SENATE -- Introduced by Sen. GIANARIS -- read twice and ordered printed, and when printed to be committed to the Committee on Rules

IN ASSEMBLY -- Introduced by M. of A. ZEBROWSKI -- read once and referred to the Committee on Governmental Operations

AN ACT to amend the state law, in relation to assembly and senate districts

The People of the State of New York, represented in Senate and Assembly, do enact as follows:

- 1 Section 1. Subdivision 98 of section 121 of the state law, as added by
 2 a chapter of the laws of 2022 amending the state law relating to estab-
 3 lishing assembly and senate districts, as proposed in legislative bill
 4 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
 5 98. Assembly District 98.
 6 Within Orange County
 7 All of Deerpark town
 8 All of Greenville town
 9 All of Minisink town
 10 All of Mount Hope town
 11 All of Port Jervis city
 12 All of Tuxedo town
 13 All of Warwick town
 14 [~~All of Wawayanda town~~]
 15 Within Rockland County
 16 Within Ramapo town:
 17 Tract: 011602
 18 Tract: 011603
 19 Tract: 011700
 20 Tract: 011800
 21 Tract: 011901
 22 Tract: 011902
 23 Tract: 012000
 24 Tract: 012111
 25 Within Orange County
 26 Within Wawayanda town:
 27 Tract: 011801
 28 Tract: 011802

EXPLANATION--Matter in *italics* (underscored) is new; matter in brackets
 [-] is old law to be omitted.

LBD14152-05-2

S. 8197

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A. 9168

1 Within Goshen town:
2 Tract: 011900 Blocks: 1000-1062 2000-2015 2017-2061 3000-3008
3 4000-4011 5010-5025 5028-5032
4 Within Monroe town:
5 Tract: 014101 Block: 1006
6 Tract: 014201 Blocks: 1000 1004 1008-1024 2002-2005 2017 3000-3032
7 Tract: 014202 Blocks: 1003 1005-1011 1015-1016 2004-2013 2018-2019
8 3012 3014-3015 3023-3024 3026-3028 4000-4002 4014-4017 5001-5026
9 Within Rockland County
10 Within Ramapo town:
11 Tract: 011507 Blocks: 1016-1020 2000-2021
12 Tract: 011508 Blocks: 1000-1007 2000-2010 3001-3018
13 Tract: 011510 Blocks: 1000-1011 2006
14 Tract: 011601 Blocks: 1000-1016 2000-2018 3001-3062
15 Tract: 012112 Blocks: 3001-3004
16 Tract: 012113 Blocks: 2005-2006 2008
17 Tract: 012114 Blocks: 1001-1018
18 Tract: 012116 Blocks: 2000-2005
19 Tract: 012505 Blocks: 1000-1016
20 Tract: 012506 Blocks: 2000-2013 2027
21 § 2. Subdivision 100 of section 121 of the state law, as added by a
22 chapter of the laws of 2022 amending the state law relating to estab-
23 lishing assembly and senate districts, as proposed in legislative bill
24 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
25 100. Assembly District 100.
26 Within Orange County
27 All of Middletown city
28 All of Wallkill town
29 Within Sullivan County
30 All of Bethel town
31 All of Callicoon town
32 All of Cochecton town
33 All of Delaware town
34 All of Fallsburg town
35 All of Forestburgh town
36 All of Highland town
37 All of Liberty town
38 All of Lumberland town
39 All of Mamakating town
40 All of Rockland town
41 All of Thompson town
42 All of Tusten town
43 Within Orange County
44 [~~All of~~ Within Wawayanda town:
45 Tract: 001601 Blocks: 1015 1017 1022-1023
46 § 3. Subdivision 101 of section 121 of the state law, as added by a
47 chapter of the laws of 2022 amending the state law relating to estab-
48 lishing assembly and senate districts, as proposed in legislative bill
49 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
50 101. Assembly District 101.
51 Within Delaware County
52 All of Andes town
53 All of Franklin town
54 All of Hamden town
55 Within Madison County
56 All of Brookfield town

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1 Within Orange County
2 All of Blooming Grove town
3 All of Chester town
4 All of Crawford town
5 All of Hamptonburgh town
6 All of Montgomery town
7 Within Otsego County
8 All of Edmeston town
9 All of Laurens town
10 All of Morris town
11 All of Otego town
12 All of Pittsfield town
13 Within Sullivan County
14 All of Neversink town
15 Within Ulster County
16 All of Denning town
17 Within Ulster County
18 All of Hardenburgh town
19 All of Rochester town
20 All of Shawangunk town
21 All of Wawarsing town
22 Within Orange County
23 Within Goshen town:
24 Tract: 012100
25 Tract: 012200
26 Tract: 011900[+] Blocks: 2016 5000-5009 5026-5027 5033-5049
27 § 4. Subdivision 108 of section 121 of the state law, as added by a
28 chapter of the laws of 2022, amending the state law relating to estab-
29 lishing assembly and senate districts, as proposed in legislative bill
30 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
31 108. Assembly District 108.
32 Within Albany County
33 All of Cohoes city
34 All of Green Island town
35 All of Watervliet city
36 Within Rensselaer County
37 All of East Greenbush town
38 All of North Greenbush town
39 All of Rensselaer city
40 All of Troy city
41 Within Saratoga County
42 All of Waterford town
43 ~~Within Albany County~~
44 ~~Within Albany city.~~
45 ~~Tract: 000100 Blocks: 1000-1040~~
46 ~~Tract: 001100 Blocks: 1010-1019-1117~~
47 ~~Tract: 002500 Blocks: 1000-1006]~~
48 § 5. Subdivision 109 of section 121 of the state law, as added by a
49 chapter of the laws of 2022, amending the state law relating to estab-
50 lishing assembly and senate districts, as proposed in legislative bill
51 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
52 109. Assembly District 109.
53 Within Albany County
54 All of Albany city
55 All of New Scotland town
56 ~~Within Albany city.~~

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1 ~~Tract: 000201~~
 2 ~~Tract: 000202~~
 3 ~~Tract: 000301~~
 4 ~~Tract: 000302~~
 5 ~~Tract: 000401~~
 6 ~~Tract: 000403~~
 7 ~~Tract: 000404~~
 8 ~~Tract: 000501~~
 9 ~~Tract: 000502~~
 10 ~~Tract: 000600~~
 11 ~~Tract: 000700~~
 12 ~~Tract: 000800~~
 13 ~~Tract: 001400~~
 14 ~~Tract: 001500~~
 15 ~~Tract: 001600~~
 16 ~~Tract: 001700~~
 17 ~~Tract: 001802~~
 18 ~~Tract: 001803~~
 19 ~~Tract: 001804~~
 20 ~~Tract: 001901~~
 21 ~~Tract: 001902~~
 22 ~~Tract: 002000~~
 23 ~~Tract: 002100~~
 24 ~~Tract: 002200~~
 25 ~~Tract: 002300~~
 26 ~~Tract: 002600]~~
 27 Within Guilderland town:
 28 Tract: 014608
 29 Tract: 014609
 30 Tract: 014611
 31 Tract: 014612
 32 Tract: 014613
 33 Tract: 014614
 34 Tract: 014615
 35 [~~Within Albany city:~~
 36 ~~Tract: 000100 Blocks: 1001 1039 1041 1043 2000 2009~~
 37 ~~Tract: 001100 Blocks: 1000 1017 1020 1121~~
 38 ~~Tract: 002500 Blocks: 1001 1031 2000 2010 3000 3018 4000 4011]~~
 39 Within Guilderland town:
 40 Tract: 014617 Blocks: 1012 1014 2011-2028
 41 § 6. Subdivision 61 of section 127 of the state law, as added by a
 42 chapter of the laws of 2022 amending the state law relating to estab-
 43 lishing assembly and senate districts, as proposed in legislative bill
 44 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
 45 61. Assembly District 61.
 46 Within New York County
 47 Within Manhattan Borough:
 48 Tract: 000100
 49 Tract: 000500
 50 Tract: 031703
 51 Tract: 031704
 52 Tract: 031900
 53 Within Richmond County
 54 Within Staten Island Borough:
 55 Tract: 000300
 56 Tract: 001100

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1 Tract: 001700
 2 Tract: 002100
 3 Tract: 004003
 4 Tract: 007700
 5 Tract: 008100
 6 Tract: 009701
 7 Tract: 009702
 8 Tract: 012500
 9 Tract: 013301
 10 Tract: 013302
 11 Tract: 014100
 12 Tract: 020701
 13 Tract: 020702
 14 Tract: 021300
 15 Tract: 022300
 16 Tract: 023100
 17 Tract: 023900
 18 Tract: 024700
 19 Tract: 025100
 20 Within Kings County
 21 Within Brooklyn Borough:
 22 Tract: 001802 Block: 0001
 23 Tract: 001803 Blocks: 0001-0002
 24 Tract: 001804 Block: 0001
 25 Tract: 003400 Block: 0001
 26 Tract: 005301 Blocks: 0001-0002
 27 Tract: 005302 Blocks: 0001 0003-0004
 28 Within New York County
 29 Within Manhattan Borough:
 30 Tract: 000700 Blocks: 0001 1000-1004 7004 7006-7008 8000-8002 9000
 31 Tract: 000900 Blocks: 0001-0002 1003-1023 2000-2001
 32 Tract: 001300 Blocks: 1000-1002 2000-2009 3000-3005 4000-4008
 33 5000-5001 5003-5004
 34 Tract: 001501 Blocks: 1009-1010 1017
 35 Tract: 001502 Blocks: 1000-1004
 36 Within Richmond County
 37 Within Staten Island Borough:
 38 Tract: 000600 Block: 0001
 39 Tract: 000700 Blocks: 0001 1000-1003 2000-2002 3000-3002 4000-4007
 40 Tract: 000900 Blocks: 1000-1007 2000-2005
 41 Tract: 002700 Block: 2001
 42 Tract: 002900 Blocks: 1000-1008 2000 3004-3011 4000-4010
 43 Tract: 003300 Blocks: 1000-1006 2000-2005 2007-2012
 44 Tract: 003900 Block: 1000
 45 Tract: 004002 Blocks: 1003-1004 2000-2012
 46 Tract: 004004 Blocks: 1000-1001 1003-1005 2000-2008 2010 2012
 47 Tract: 004700 Blocks: 1000-1002 1016-1017
 48 Tract: 006700 Blocks: 1000-1010
 49 Tract: 007500 Blocks: 1000-1004 2000-2001 3000-3004
 50 Tract: 010500 Blocks: 1000-1005 5000-5008
 51 Tract: 014700 Blocks: 1000-1008
 52 Tract: 015100 Blocks: 1000-1019 2000-2002
 53 Tract: 018901 Blocks: 1000-1014 1018-1020 1030-1031 3005-3006
 54 Tract: 019700 Blocks: 1002-1004 1014-1015
 55 Tract: 020100 Blocks: 1000-1012 2000 3000-3007 3014-3015
 56 Tract: 030301 Blocks: 2000-2001 2004 2011

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A. 9168

1 Tract: 030302 Blocks: 3000-3005 [~~3040~~] 3008-3017 4000
2 § 7. Subdivision 62 of section 127 of the state law, as added by a
3 chapter of the laws of 2022 amending the state law relating to estab-
4 lishing assembly and senate districts, as proposed in legislative bill
5 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
6 62. Assembly District 62.
7 Within Richmond County
8 Within Staten Island Borough:
9 Tract: 014607
10 Tract: 014608
11 Tract: 015602
12 Tract: 017005
13 Tract: 017007
14 Tract: 017009
15 Tract: 017011
16 Tract: 017012
17 Tract: 017013
18 Tract: 017014
19 Tract: 017015
20 Tract: 017016
21 Tract: 017600
22 Tract: 019800
23 Tract: 020803
24 Tract: 020804
25 Tract: 020805
26 Tract: 020806
27 Tract: 022601
28 Tract: 022602
29 Tract: 022801
30 Tract: 024401
31 Tract: 024402
32 Tract: 024800
33 Tract: 013201 Blocks: 1000-1001
34 Tract: 013203 Block: 1000
35 Tract: 013204 Blocks: 1000 2000 2003-2004 2020-2021 3000-3023
36 Tract: 013800 Blocks: 1000-1024 2000-2021 3000-3013 4000-4003
37 4010-4011 5011
38 Tract: 014604 Blocks: 1000-1014 2000-2003 2009-2011 3000-3014 4005
39 Tract: 014605 Blocks: 1000-1024 2000-2025
40 Tract: 014606 Blocks: 1000-1005 2000-2011 3000-3004 4000-4006
41 Tract: 015601 Blocks: 4004-4007 4012-4013 5008-5014 6006-6010
42 Tract: 015603 Blocks: 0002-0003 1000-1008 2012-2014
43 Tract: 022802 Blocks: [~~1005-1021~~] 1006-1012 1014 1016-1021 1024
44 Tract: 027900 Blocks: 1001 1006-1008 1010-1014 1017-1023 2002-2003
45 2005 2007-2012 3000-3001
46 Tract: 029102 Blocks: [~~1048~~] 1054-1056 [~~1060~~] 1060-1061 1064-1065
47 1068-1070 2004-2006 [~~2009-2019~~] 2010-2020
48 Tract: 990100 Blocks: 0008-0010
49 § 8. Subdivision 63 of section 127 of the state law, as added by a
50 chapter of the laws of 2022 amending the state law relating to estab-
51 lishing assembly and senate districts, as proposed in legislative bill
52 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
53 63. Assembly District 63.
54 Within Richmond County
55 Within Staten Island Borough:
56 Tract: 003600

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1 Tract: 004001
 2 Tract: 005901
 3 Tract: 005902
 4 Tract: 012100
 5 Tract: 016901
 6 Tract: 018701
 7 Tract: 018703
 8 Tract: 018704
 9 Tract: 018902
 10 Tract: 027301
 11 Tract: 027302
 12 Tract: 027702
 13 Tract: 027704
 14 Tract: 027705
 15 Tract: 027706
 16 Tract: 029104
 17 Tract: 029105
 18 Tract: 029106
 19 Tract: 031901
 20 Tract: 031902
 21 Tract: 032300
 22 Tract: 000600 Blocks: 1000-1006 1007-1011 2000-2002 2006-2007
 23 Tract: 000800 Blocks: 1000-1022 2000-2012 3000-3001 3007
 24 Tract: 002001 Blocks: 1000-1015 2002-2004 2011-2014
 25 Tract: 002002 Block: 2004
 26 Tract: 002700 Blocks: 1000-1001 2000 2002-2004
 27 Tract: 002900 Blocks: 3000-3003
 28 Tract: 003300 Block: 2006
 29 Tract: 003900 Blocks: 1001-1002 2000-2009
 30 Tract: 004002 Blocks: 1000-1002
 31 Tract: 004004 Blocks: 1002 1006-1016 2009 2011 2013-2019
 32 Tract: 004700 Blocks: 1003-1015 1018-1025 2000-2008
 33 Tract: 005000 Blocks: 2000-2003 2006-2015 3000 3004-3006
 34 Tract: 006700 Blocks: 2000-2013 3000-3011
 35 Tract: 007500 Blocks: 2002-2005 3005-3009
 36 Tract: 010500 Blocks: 2000-2008 3000-3005 4000-4006
 37 Tract: 014700 Blocks: 1009 2000-2018 3000-3010
 38 Tract: 015100 Blocks: 2003-2009 3000-3007 4000-4009 5000-5009
 39 Tract: 017300 Blocks: 1004-1008 1011-1014 1017 1020 2000
 40 Tract: 018100 Blocks: 1000-1002 2022
 41 Tract: 018901 Blocks: 1015-1017 1021-1029 2000-2019 3000-3004
 42 3007-3019
 43 Tract: 019700 Blocks: 1000-1001 1005-1013 1016-1021 2000-2016
 44 Tract: 020100 Blocks: 2001-2011 3008-3013 3016
 45 Tract: 022802 Blocks: 1000-1005 1013 1022-1023
 46 Tract: 027900 Blocks: 1000 1002-1005 1009 1015-1016 2000-2001
 47 4000-4003
 48 Tract: 029102 Blocks: 0001-0002 [~~1000-1047-1049-1053~~] 1000-1053 1057-
 49 1059 1062-1063 1066-1067 2000-2003 [~~2007-2008-2020~~] 2007-2009
 50 Tract: 030301 Blocks: 1000-1014 2002-2003 2005-2010 2012-2018
 51 Tract: 030302 Blocks: 1000-1008 2000-2004 3006-3007 3018-3019
 52 4001-4002
 53 § 9. Subdivision 4 of section 127 of the state law, as added by a
 54 chapter of the laws of 2022 amending the state law relating to estab-
 55 lishing assembly and senate districts, as proposed in legislative bill
 56 numbers S. 8185-A and A. 9040-A, is amended to read as follows:

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A. 9168

1 4. Senate District 4.
 2 Within Nassau County
 3 Within Oyster Bay town:
 4 Tract: 520700
 5 Tract: 520900
 6 Tract: 521000
 7 Tract: 521100
 8 Tract: 521200
 9 Tract: 521301
 10 Tract: 521302
 11 Tract: 521400
 12 Tract: 521500
 13 Tract: 521601
 14 Tract: 521602
 15 Tract: 521700
 16 Tract: 521802
 17 Tract: 521902
 18 Tract: 990302
 19 Tract: 520502 Blocks: 3001 3004-3009 3017-3023 4010-4021
 20 Tract: 520800 Blocks: 1000-1005 1007-1014 2000-2011 3000-3005
 21 3007-3013 4000-4010
 22 Tract: 521801 Blocks: 1003 1006-1010 1012-1018 2000-2014 3000-3018
 23 4000-4013
 24 Tract: 522000 Blocks: 2000-2020 3001-3003 4011-4018 5027-5028
 25 Within Suffolk County
 26 Within Babylon town:
 27 Tract: 122901
 28 Tract: 122902
 29 Tract: 123001
 30 Tract: 123002
 31 Tract: 123101
 32 Tract: 123102
 33 Tract: 123404
 34 Tract: 123600
 35 Tract: 123801
 36 Tract: 123802
 37 Tract: 124001
 38 Tract: 124002
 39 Tract: 124101
 40 Tract: 124102
 41 Tract: 124200
 42 Tract: 124301
 43 Tract: 124302
 44 Tract: 124401
 45 Tract: 124402
 46 Tract: 124500
 47 Tract: 124601
 48 Tract: 124602
 49 Within Islip town:
 50 Tract: 146103
 51 Tract: 146205
 52 Tract: 146500
 53 Tract: 146607
 54 Tract: 146608
 55 Tract: 146616
 56 Tract: 146617

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A. 9168

1 Tract: 146619
 2 Tract: 146620
 3 Tract: 146704
 4 Tract: 146705
 5 Tract: 146800
 6 Tract: 146901
 7 Tract: 146902
 8 Tract: 147001
 9 Tract: 147004
 10 Tract: 147401
 11 Tract: 147402
 12 Tract: 147502
 13 Tract: 147503
 14 Tract: 147504
 15 Tract: 147505
 16 Tract: 147601
 17 Tract: 147602
 18 Tract: 147701
 19 Tract: 147702
 20 Tract: 147802
 21 Tract: 147803
 22 Tract: 147804
 23 Tract: 147901
 24 Tract: 147902
 25 Within Babylon town:
 26 Tract: 122408 Blocks: 1036-1037 1039-1046
 27 Tract: 122802 Blocks: 2000-2021
 28 Tract: 123401 Blocks: 3000-3029
 29 Tract: 123403 Blocks: 2000 2002 2018-2021 [~~2022-2024~~] 2023-2024
 30 Tract: 123900 Blocks: 1000-1035 2000-2026 3000-3005 3012-3025
 31 3029-3045
 32 Tract: 990100 Block: 0030
 33 Within Islip town:
 34 Tract: 146005 Blocks: 1000-1002 1003 1008-1016 1019-1021 1041 1042
 35 1046
 36 Tract: 146206 Blocks: 2000-2031
 37 Tract: 146300 Block: 2037
 38 Tract: 146402 Blocks: 1000-1002 1004-1034 2000-2008 3000-3012
 39 Tract: 146612 Blocks: 2018 2025 2027 2029-2030 3000-3017
 40 Tract: 146613 Blocks: 1025 2000-2028
 41 Tract: 146618 Blocks: 4021-4023 4031
 42 Tract: 146706 Blocks: 1000-1020 2000-2016 2034
 43 Tract: 147003 Blocks: 1001-1041 2000-2029 3000-3014
 44 Tract: 147100 Blocks: 1000-1002 1004-1005 1010-1021 1025-1043
 45 2000-2033 3000-3053
 46 Tract: 147201 Blocks: 1000-1017 2003-2014 3000-3016 4000-4005
 47 Tract: 147202 Block: 1023
 48 Tract: 147301 Blocks: 1000-1003 1032-1042
 49 Tract: 147302 Blocks: 1000-1011 2003-2008 2010-2022 3007-3016
 50 4000-4014
 51 Tract: 990100 Block: 0029
 52 § 10. Subdivision 9 of section 127 of the state law, as added by a
 53 chapter of the laws of 2022 amending the state law relating to estab-
 54 lishing assembly and senate districts, as proposed in legislative bill
 55 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
 56 9. Senate District 9.

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A. 9168

1 Within Nassau County
2 All of Long Beach city
3 Within Hempstead town:
4 Tract: 405301
5 Tract: 405302
6 Tract: 405400
7 Tract: 405500
8 Tract: 405600
9 Tract: 405700
10 Tract: 405800
11 Tract: 405900
12 Tract: 406001
13 Tract: 406002
14 Tract: 406100
15 Tract: 406201
16 Tract: 406202
17 Tract: 409800
18 Tract: 409900
19 Tract: 410000
20 Tract: 410100
21 Tract: 410200
22 Tract: 410300
23 Tract: 410400
24 Tract: 410500
25 Tract: 410600
26 Tract: 410700
27 Tract: 410800
28 Tract: 411800
29 Tract: 411901
30 Tract: 411902
31 Tract: 412000
32 Tract: 412100
33 Tract: 412200
34 Tract: 412301
35 Tract: 412302
36 Tract: 412400
37 Tract: 412500
38 Tract: 412600
39 Tract: 412700
40 Tract: 413001
41 Tract: 413002
42 Tract: 413100
43 Tract: 413200
44 Tract: 413300
45 Tract: 413400
46 Tract: 413700
47 Tract: 413803
48 Tract: 416202
49 Tract: 416300
50 Tract: 404500 Block: 2010
51 Tract: 404700 Blocks: 3000-3018 4006 4014-4015 5000-5009
52 Tract: 407101 Block: 4028
53 Tract: 410900 Blocks: 1000-1007 2000-2016 3000-3010 4000-4016
54 4018-4019
55 Tract: 411301 Blocks: 3000-3007 3013-3016
56 Tract: 411500 Blocks: 1000-1024 2000-2031

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A. 9168

1 Tract: 411700 Blocks: 2000-2027 3000-3010 [~~3012-3015~~] 3012-3013 3015
 2 4000-4014 5000-5015
 3 Tract: 412800 Blocks: 1000-1003 1005-1040 2000-2020 3000-3012
 4 Tract: 412900 Blocks: 4000-4020
 5 Tract: 413500 Blocks: 1000-1011 2003-2010 3016 3018-3020 3022-3023
 6 4001-4004 4006-4009 5000-5014 6000-6009
 7 Tract: 413600 Blocks: 1000-1012 2000-2011 2013 2015-2016 3000-3015
 8 4000-4023 5000-5013
 9 Tract: 413804 Blocks: 1000-1016 2000 2002-2014 3000-3016
 10 Tract: 416201 Blocks: 1000-1002 1004-1038 2000-2027 3000-3017
 11 Tract: 416900 Blocks: 1049-1053 1063-1083 2000-2032 3000-3026
 12 Tract: 990400 Blocks: 0006-0007
 13 § 11. Subdivision 52 of section 127 of the state law, as added by a
 14 chapter of the laws of 2022 amending the state law relating to estab-
 15 lishing assembly and senate districts, as proposed in legislative bill
 16 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
 17 52. Senate District 52.
 18 Within Cayuga County
 19 All of Auburn city
 20 All of Owasco town
 21 All of Sennett town
 22 Within Onondaga County
 23 All of Camillus town
 24 All of Clay town
 25 All of De Witt town
 26 All of Elbridge town
 27 All of Geddes town
 28 All of Manlius town
 29 All of Marcellus town
 30 All of Salina town
 31 All of Skaneateles town
 32 All of Van Buren town
 33 Within Syracuse city:
 34 Tract: 000100
 35 Tract: 000200
 36 Tract: 000300
 37 Tract: 000400
 38 Tract: 000501
 39 Tract: 000600
 40 Tract: 000700
 41 Tract: 000800
 42 Tract: 000900
 43 Tract: 001400
 44 Tract: 001500
 45 Tract: 002000
 46 Tract: 002101
 47 Tract: 002700
 48 Tract: 002901
 49 Tract: 003000
 50 Tract: 003800
 51 Tract: 004800
 52 Tract: 001000 Blocks: 1000-1002 2000-2005 2012-2013 3000-3013
 53 4000-4002 4004 4006
 54 Tract: 001600 Blocks: 1000-1002 2000-2001
 55 Tract: 002300 Blocks: 1000-1008 2000-2034 2036-2037 [~~2040-2041~~] 2040-
 56 2041 2043-2044

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1 Tract: 003200 Blocks: 1000-1025 1028-1032 2001
2 Tract: 003900 Blocks: 1000-1010 2000-2012 3003-3008
3 Tract: 004000 Blocks: 1000-1010 1016-1017
4 Tract: 004900 Blocks: 1000-1016 2000-2005 2007-2009
5 Tract: 005000 Blocks: 1001-1012 1016
6 Tract: 013200 Blocks: 1002-1003 1009-1011 2001-2002 2032-2033
7 § 12. Subdivision 53 of section 127 of the state law, as added by a
8 chapter of the laws of 2022 amending the state law relating to estab-
9 lishing assembly and senate districts, as proposed in legislative bill
10 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
11 53. Senate District 53.
12 All Of Tompkins County
13 Within Broome County
14 All of Barker town
15 All of Binghamton city
16 All of Binghamton town
17 All of Chenango town
18 All of Conklin town
19 All of Dickinson town
20 All of Kirkwood town
21 All of Lisle town
22 All of Maine town
23 All of Nanticoke town
24 All of Triangle town
25 All of Union town
26 All of Vestal town
27 Within Cortland County
28 All of Cincinnatus town
29 All of Cuyler town
30 All of Freetown town
31 All of Harford town
32 All of Lapeer town
33 All of Marathon town
34 All of Solon town
35 All of Taylor town
36 All of Truxton town
37 All of Virgil town
38 All of Willet town
39 Within Tioga County
40 All of Newark Valley town
41 All of Owego town
42 All of Richford town
43 Within Tompkins County
44 All of Caroline town
45 All of Danby town
46 All of Dryden town
47 All of Enfield town
48 All of Groton town
49 All of Ithaca city
50 All of Ithaca town
51 All of Lansing town
52 All of Newfield town
53 All of Ulysses town
54 ~~All Of Genesee County~~
55 § 13. Subdivision 62 of section 127 of the state law, as added by a
56 chapter of the laws of 2022 amending the state law relating to estab-

S. 8197

13

A. 9168

1 lishing assembly and senate districts, as proposed in legislative bill
2 numbers S. 8185-A and A. 9040-A, is amended to read as follows:
3 62. Senate District 62.
4 All Of Orleans County
5 Within Monroe County
6 All of Chili town
7 All of Clarkson town
8 All of Hamlin town
9 All of Mendon town
10 All of Ogden town
11 All of Parma town
12 All of Riga town
13 All of Rush town
14 All of Sweden town
15 All of Wheatland town
16 ~~All of Cambria town~~
17 Within Niagara County
18 All of Cambria town
19 All of County subdivisions not defined
20 All of Hartland town
21 All of Lewiston town
22 All of Lockport city
23 All of Lockport town
24 All of Newfane town
25 All of Niagara town
26 All of North Tonawanda city
27 All of Pendleton town
28 All of Porter town
29 All of Royalton town
30 All of Somerset town
31 All of Tonawanda Reservation
32 All of Tuscarora Nation Reservation
33 All of Wheatfield town
34 All of Wilson town
35 Within Niagara Falls city:
36 Tract: 022300 Block: 1000
37 Tract: 022500 Blocks: 1010-1013 2000-2007 3000-3003
38 Within Orleans County
39 All of Albion town
40 All of Barre town
41 All of Carlton town
42 All of Clarendon town
43 All of County subdivisions not defined
44 All of Gaines town
45 All of Kendall town
46 All of Murray town
47 All of Ridgeway town
48 All of Shelby town
49 All of Yates town
50 § 14. This act shall take effect on the same date and in the same
51 manner as a chapter of the laws of 2022, amending the state law relating
52 to establishing assembly and senate districts, as proposed in legisla-
53 tive bill numbers S. 8185-A and A. 9040-A, takes effect.

LETTER FROM ERIC HECKER, ESQ. TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 9, 2022 [668 - 669]

CUTI HECKER WANG LLP

305 BROADWAY, SUITE 607
NEW YORK, NY 10007

ERIC HECKER
212.620.2602 TEL
212.620.2612. FAX

EHECKER@CHWLLP.COM

February 9, 2022

By E-Filing

Hon. Patrick F. McAllister
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider et al. v. Hochul et al.*, Index No. E2022-0116CV

Dear Justice McAllister:

We represent the Senate Majority Leader in this special proceeding, which Petitioners commenced on February 3, 2022 and served on the Majority Leader yesterday afternoon. Although it will be difficult to comply with the February 17, 2022 opposition date that the Court set in its Order to Show Cause, we have been working diligently to do so. Until last night, we had no intention of asking the Court to revisit the schedule.

Last night, however, Petitioners filed a second proposed Order to Show Cause, this time seeking leave to greatly expand the scope of this special proceeding to include not just specific challenges to the Congressional redistricting map but also specific challenges to the Senate redistricting map. Petitioners cannot credibly deny that they were aware of the existence and characteristics of the Senate map when they filed this proceeding challenging only the Congressional map. They nevertheless commenced this proceeding by proposed Order to Show Cause – *ex parte*, thereby preventing Respondents from being heard with respect to the schedule – without informing the Court of their intention to amend their Petition to challenge both the Congressional and Senate reapportionments. Then, after this Court already had set a compressed schedule, they filed a second proposed Order to Show Cause, again *ex parte*, seeking to expand the scope of the proceeding significantly, but on the same schedule, once again before any Respondent has appeared.

Petitioners have sued a wide variety of government actors. We have calls scheduled later today with both the Attorney General's office, which may or may not represent certain Respondents, and with counsel for the Speaker of the Assembly. Basic notions of fair play require that the government actors who have been sued be given sufficient time to respond to the pending Order to Show Cause, including with respect to the schedule for their answering papers.

February 9, 2022
Page 2 of 2

We therefore respectfully request that the Court take no action on the pending second proposed Order to Show Cause until counsel for Respondents have been heard. Although we speak only for the Senate Majority Leader, we think it would be reasonable for the Court to expect to hear by Friday from counsel for those parties who have been served and are able to appear. Given the purported gravity of Petitioners' claims and the irregularity of the process thus far, we respectfully request that Respondents be given until Friday to take a position on the pending Order to Show Cause, including with respect to the schedule going forward.

We thank the Court for its attention to this letter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Eric Hecker', written in a cursive style.

Eric Hecker

cc: All Counsel of Record

ORDER TO SHOW CAUSE WHY PETITIONERS SHOULD NOT BE GRANTED LEAVE TO CONDUCT EXPEDITED DISCOVERY, DATED FEBRUARY 15, 2022 [670 - 672]

FILED: STEUBEN COUNTY CLERK 02/15/2022 01:59 PM NYSCEF DOC. NO. 51

INDEX NO. E2022-0116CV RECEIVED NYSCEF: 02/15/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 15th day of February, 2022.

PRESENT: _____ HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF STEUBEN -----X

TIM HARKENRIDER, GUY C. BROUGHT, LAWRENCE CANNING, PATRICIA CLARINO, GEORGE DOOHER, JR., STEPHEN EVANS, LINDA FANTON, JERRY FISHMAN, JAY FRANTZ, LAWRENCE GARVEY, ALAN NEPHEW, SUSAN ROWLEY, JOSEPHINE THOMAS, and MARIANNE VOLANTE,

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN, SENATE MAJORITY LEADER AND PRESIDENT PRO TEMPORE OF THE SENATE ANDREA STEWART-COUSINS, SPEAKER OF THE ASSEMBLY CARL HEASTIE, NEW YORK STATE BOARD OF ELECTIONS, and THE NEW YORK STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND REAPPORTIONMENT,

Respondents. -----X

Index No. E2022-0116CV

ORDER TO SHOW CAUSE WHY PETITIONERS SHOULD NOT BE GRANTED LEAVE TO CONDUCT EXPEDITED DISCOVERY

UPON reading of the Affirmation of Bennet J. Moskowitz dated February 14, 2022 (“Moskowitz Aff.”), and the exhibits annexed thereto, and Petitioners’ Memorandum of Law in support of their Proposed Order to Show Cause Why Petitioners Should Not be Granted Leave to Conduct Expedited Discovery; and all of the pleadings and proceedings heretofore had herein, it is hereby:

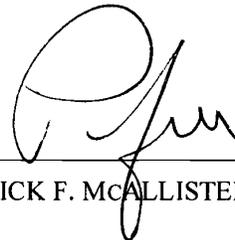
ORDERED that Respondents or their counsel appear and show cause before this Court, at IAS Part __, Room ____, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 3rd day of ~~February~~^{March}, 2022, at 9:30 a.m., or as soon thereafter as counsel can be heard, why an Order should not be issued granting Petitioners leave to pursue the discovery attached in the Moskowitz Aff.; and it is

FURTHER ORDERED that Respondents shall serve any papers in opposition by NYSCEF no later than the 25th day of February, 2022; and it is

FURTHER ORDERED that Petitioners shall serve any reply papers in further support of their Motion for Leave to Amended by NYSCEF no later than the 2 day of ~~February~~^{March}, 2022.

DATED: Bath, New York
February 15, 2022

ENTER:



HON. PATRICK F. McALLISTER, J.S.C.

Dated: New York, New York

February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

KEYSER MALONEY &
WINNER LLP

By: s/ Bennet J. Moskowitz

Bennet J. Moskowitz, Reg. No. 4693842
875 Third Avenue
New York, New York 10022
(212) 704-6000
bennet.moskowitz@troutman.com

By: s/ George H. Winner, Jr.

George H. Winner, Jr., Reg. No. 1539238
150 Lake Street
Elmira, New York 14901
(607) 734-0990
gwinner@kmw-law.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

AFFIRMATION OF BENNET J. MOSKOWITZ, ESQ., FOR PETITIONERS, IN SUPPORT OF ORDER TO SHOW CAUSE WHY PETITIONERS SHOULD NOT BE GRANTED LEAVE TO CONDUCT EXPEDITED DISCOVERY, DATED FEBRUARY 14, 2022 [673 - 676]

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM
NYSCEF DOC. NO. 31

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RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND MARIANNE
VOLANTE,

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

Index No. E2022-0116CV

**AFFIRMATION OF
ATTORNEY BENNET J.
MOSKOWITZ IN SUPPORT
OF PETITIONERS'
PROPOSED ORDER TO
SHOW CAUSE WHY
PETITIONERS SHOULD
NOT BE GRANTED LEAVE
TO CONDUCT EXPEDITED
DISCOVERY**

Bennet J. Moskowitz, an attorney admitted to practice in the State of New York, affirms under the penalties of perjury as follows:

1. I am a Partner at Troutman Pepper Hamilton Sanders LLP, attorneys for Petitioners in this CPLR Art. 4 special proceeding.
2. I submit this affirmation in support of Petitioners' Motion For Leave To Conduct Expedited Discovery.
3. Petitioners, electors in the State of New York, commenced this special proceeding on February 3, 2022, to challenge, *inter alia*, the validity of the Legislature's new congressional map ("2022 congressional map"), *see* Petition, NYSCEF Doc. No. 1, and—in a pending

amendment to their Petition—the new state Senate map (“2022 state Senate map”), Proposed Amended Petition (“Amend. Pet.”), NYSCEF Doc. No. 18, ¶¶ 179–212.

4. A copy of Petitioners’ Petition (NYSCEF Doc. No. 1) is attached hereto as Exhibit A.

5. A copy of Petitioner’s proposed Amended Petition (NYSCEF Doc. No. 18) is attached hereto as Exhibit B.

6. Because this matter is a special proceeding, pursuant to CPLR § 408, Petitioners must obtain the leave of Court in order to serve most discovery requests.

7. Time is of the essence in this matter, including because (i) the State Constitution explicitly provides that redistricting cases like the case here take “precedence . . . over all other causes and proceedings,” and that the Court “shall render its decision within sixty days after a petition is filed,” N.Y. Const. art. III, § 5, and (ii) redistricting is an extremely time-sensitive requirement, including because candidates must know what their districts are in advance of an election, in order to meet state ballot-access requirements. Indeed, multiple petition and signature-related deadlines are looming for New York congressional candidates the 2022 New York State political calendar (*e.g.*, a March 1, 2022 deadline for prospective candidates to start gathering petitions).

8. Accordingly, Petitioners are seeking leave to pursue expedited discovery so that they may discover additional material and necessary facts further establishing their claims.

9. Specifically, Petitioners are now moving for leave to serve the party document requests and deposition notices and non-party subpoenas attached in full hereto as Exhibits 1–14, respectively:

Exhibit 1: Petitioners’ First Request for the Production of Documents to Respondents

Exhibit 2: Notice of Deposition of Respondent Governor Kathy Hochul

Exhibit 3: Notice of Deposition of Respondent Brian A. Benjamin, Lieutenant Governor and President of the Senate

Exhibit 4: Notice of Deposition of Respondent Andrea Stewart-Cousins, Senate Majority Leader and President *Pro Tempore* of the Senate

Exhibit 5: Notice of Deposition of Respondent Carl E. Heastie, Speaker of the Assembly

Exhibit 6: Notice of Deposition of Assemblymember Kenneth Zebrowski, Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment

Exhibit 7: Notice of Deposition of Senator Michael Gianaris, Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment

Exhibit 8: Notice of Deposition of Eric Katz, Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment

Exhibit 9: Notice of Deposition of Phillip Chonigman, Senate Co-Executive Director and Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment

Exhibit 10: Subpoena Duces Tecum Ad Testificandum to David Imamura, Commissioner, New York State Independent Redistricting Commission;

Exhibit 11: Subpoena Duces Tecum Ad Testificandum to Eugene Benger, Commissioner, New York State Independent Redistricting Commission;

Exhibit 12: Subpoena Duces Tecum Ad Testificandum to Ivelisse Cuevas-Molina, Commissioner, New York State Independent Redistricting Commission

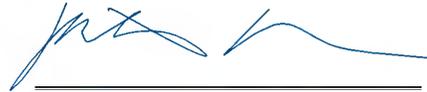
Exhibit 13: Subpoena Duces Tecum Ad Testificandum to John Flateau, Commissioner, New York State Independent Redistricting Commission

Exhibit 14: Subpoena Duces Tecum Ad Testificandum to Elaine Frazier, Commissioner, New York State Independent Redistricting Commission

WHEREFORE, it is respectfully requested that the Court grant Petitioners' Motion for Leave to Conduct Expedited Discovery by entering an Order: (a) granting Petitioners leave to

serve the discovery requests, deposition notices and subpoenas attached hereto; (b) directing that all responses to all such discovery requests be served within seven (7) days of service thereof; and (c) granting Petitioners such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 14, 2022



BENNET J. MOSKOWITZ

**EXHIBIT A TO MOSKOWITZ AFFIRMATION -
PETITION, DATED FEBRUARY 3, 2022
(REPRODUCED HEREIN AT PP. 51-117)**

**EXHIBIT B TO TO MOSKOWITZ AFFIRMATION -
AMENDED PETITION, DATED FEBRUARY 8, 2022
(REPRODUCED HEREIN AT PP. 299-381)**

**EXHIBIT 1 TO MOSKOWITZ AFFIRMATION -
 PETITIONERS' FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS
 TO RESPONDENTS, DATED FEBRUARY 14, 2022 [678 - 686]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 34

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
 COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
 LAWRENCE CANNING, PATRICIA CLARINO,
 GEORGE DOOHER, JR., STEPHEN EVANS,
 LINDA FANTON, JERRY FISHMAN, JAY
 FRANTZ, LAWRENCE GARVEY, ALAN
 NEPHEW, SUSAN ROWLEY, JOSEPHINE
 THOMAS, and MARIANNE VOLANTE,

Index No.: E2022-0116CV

**PETITIONERS' FIRST
 REQUEST FOR THE
 PRODUCTION OF
 DOCUMENTS TO
 RESPONDENTS**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
 GOVERNOR AND PRESIDENT OF THE
 SENATE BRIAN A. BENJAMIN, SENATE
 MAJORITY LEADER AND PRESIDENT PRO
 TEMPORE OF THE SENATE ANDREA
 STEWART-COUSINS, SPEAKER OF THE
 ASSEMBLY CARL HEASTIE, NEW YORK
 STATE BOARD OF ELECTIONS, and THE NEW
 YORK STATE LEGISLATIVE TASK FORCE ON
 DEMOGRAPHIC RESEARCH AND
 REAPPORTIONMENT,

Respondents.

-----X

PLEASE TAKE NOTICE that, pursuant to CPLR § 408 and CPLR 3120, as well as by order of the Court, Petitioners Tim Harkendrider, Guy Brought, Lawrence Canning, Patricia Clarino, Georgia Dooher, Stephen Evans, Linda Fanton, Jerry Fishman, Jay Frantz, Lawrence Garvey, Alan Nephew, Susan Rowley, Josephine Thomas, and Marianne Volante, through their undersigned counsel, Troutman Pepper Hamilton Sanders LLP (“Troutman Pepper”), request that Respondents in the above-captioned matter produce the documents described herein for inspection and copying within seven (7) days of the service hereof at the offices of Troutman Pepper, 875 Third Avenue, New York, New York 10022, in accordance with the following

Definitions and Instructions.

DEFINITIONS

For purposes of these requests for the production of documents (the "Requests," and each a "Request"), the following definitions apply:

1. The term "Person" means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

2. The term "Document" means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

3. The term "Electronic Data" as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents,

spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

4. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

5. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

6. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

7. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

8. As used herein, each singular word shall include its plural and vice versa.
9. The terms “all,” “any” and “each” shall be construed as encompassing any and all.
10. “You” or “Your” means the respective Respondent responding to the Requests, and all other persons acting or purporting to act for or on his/her/its behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.
11. “Commissioners of the Democratic Caucus of the IRC” means democratic members of the New York Independent Redistricting Commission, consisting of Democratic Commissioners David Imamura, Eugene Bengler, John Fleteau, and Elaine Frazier, along with non-party enrollee Ivelisse Cuevas-Molina.
12. “This Action” means the above-captioned action.
13. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in This Action (NYSCEF Doc. No. 18).
14. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

1. If any documents requested are not produced but are withheld on a claim of privilege, identify each such document by providing the date of its preparation, the name of the persons preparing and receiving it, and the identity of each person to whom a copy of such document has been delivered, or to whom disclosure of the document was made, either orally or in writing.
2. If You claim any ambiguity in interpreting any Request or any definition or instruction applicable to a Request, You may not use such a claim as a basis for refusing to respond to the Request, but shall respond to the Request applying the broadest possible interpretation.

3. Where documents in the possession of a legal entity are requested, such Request includes the entity's employees, advisors, attorneys, representatives, agents, members, partners, officers, directors, independent contractors, successors and assigns, and all other persons acting or purporting to act for or on behalf of any one or more of the foregoing now or at any prior time.

4. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

5. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

6. You shall preserve and maintain all documents in their native format throughout

the course of this litigation and shall specifically preserve all metadata concerning all documents.

7. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

8. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

9. These Requests are continuing in nature so as to require further and supplemental productions if You discover, receive or generate additional responsive documents between the time of Your original production and the time of the final disposition of this lawsuit.

10. "Identify" (with respect to natural persons). When referring to, or when applicable to, a natural person, "to identify" means to contain the following information: the person's full name, present or last known address, and the present or last known place of employment.

11. "Identify" (with respect to persons other than natural persons). When referring to, or when applicable to, a person other than a natural person, "to identify" means to contain the following information: the full name, present or last known address, and the present or last

known place of employment of each of the person's partners, officers, directors, members and agents authorized to accept service of process.

12. The use of any tense of any verb includes all other tenses of the verb.

13. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

14. Unless otherwise indicated, the time frame applicable to these Document Requests is August 1, 2021 through the present.

DOCUMENTS REQUESTED

1. All Documents and Communications with or otherwise concerning the Commissioners of the Democratic Caucus of the IRC. This includes, without limitation, all Documents and Communications concerning the work of the Commissioners of the Democratic Caucus of the IRC, which Documents and Communications You received from third parties.

2. All Documents and Communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, Documents and Communications concerning (i) the use or consideration of political data or information; (ii) data or information concerning political parties; (iii) the use or considerations of data or information concerning incumbent politicians; or (iv) use or considerations of data or information concerning particular candidates for congressional or state Senate office.

3. Documents sufficient to identify all consultants and experts who are providing services to You concerning This Action.

4. All Documents and Communications that You intend to introduce into evidence in This Action.

5. All Documents and Communications concerning the subject matter of the Amended Petition.

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 34

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

Dated: February 14, 2022

TROUTMAN PEPPER HAMILTON SANDERS LLP

By: *s/ Bennet J. Moskowitz* _____

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
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misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 2 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF RESPONDENT
GOVERNOR KATHY HOCHUL, DATED FEBRUARY 14, 2022 [687 - 688]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 35

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Kathy Hochul, Governor of New York, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on **the 17th day of February, 2022, at 9:00AM ET**, with respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
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Misha Tseytlin, Reg. No. 4642609
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Attorneys for Petitioners

**EXHIBIT 3 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF RESPONDENT
BRIAN A. BENJAMIN, LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE,
DATED FEBRUARY 14, 2022 [689 - 690]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM
NYSCEF DOC. NO. 36

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Brian A. Benjamin, Lieutenant Governor and President of the Senate, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810**,* on the **17th day of February, 2022**, at **9:00AM ET**, with respect to evidence material

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

and necessary in the prosecution of this action. The examination will continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that, that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz _____

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
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bennet.moskowitz@troutman.com

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Attorneys for Petitioners

**EXHIBIT 4 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF RESPONDENT
ANDREA STEWART-COUSINS, SENATE MAJORITY LEADER AND PRESIDENT
PRO TEMPORE OF THE SENATE, DATED FEBRUARY 14, 2022 [691 - 692]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 37

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Andrea Stewart-Cousins, Senate Majority Leader and President Pro Tempore of the Senate, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **18th day of February, 2022,**

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

at **9:00AM ET**, with respect to evidence material and necessary in the prosecution of this action.

The examination will continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz

Bennet J. Moskowitz
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Attorneys for Petitioners

**EXHIBIT 5 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF RESPONDENT
CARL E. HEASTIE, SPEAKER OF THE ASSEMBLY,
DATED FEBRUARY 14, 2022 [693 - 694]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 38

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Carl Heastie, Speaker of the Assembly, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **18th day of February, 2022, at 9:00AM ET**, with respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 38

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz

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misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 6 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF ASSEMBLYMEMBER
KENNETH ZEBROWSKI, DEMOCRATIC HEAD OF RESPONDENT THE NEW YORK
STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT, DATED FEBRUARY 14, 2022 [695 - 696]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 39

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Kenneth Zebrowski, Member of the New York State Legislative Task Force on Demographic Research and Reapportionment, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **21st day**

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

of February, 2022, at 9:00AM ET, with respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz _____

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 7 TO MOSKOWITZ AFFIRMATION -
NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF SENATOR MICHAEL
GIANARIS, DEMOCRATIC HEAD OF RESPONDENT THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT, DATED FEBRUARY 14, 2022 [697 - 698]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 40

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Respondent Michael Gianaris, Member of the New York State Legislative Task Force on Demographic Research and Reapportionment, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **21st day**

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

of February, 2022, at 9:00AM ET, with respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz _____

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 8 TO MOSKOWITZ AFFIRMATION -
NOTICE OF DEPOSITION OF ERIC KATZ, DEMOCRATIC HEAD OF RESPONDENT THE
NEW YORK STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT, DATED FEBRUARY 14, 2022 [699 - 700]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 41

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Eric Katz, Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **22nd**

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

day of February, 2022, at 9:00AM ET, with respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 9 TO MOSKOWITZ AFFIRMATION -
NOTICE OF DEPOSITION OF PHILLIP CHONIGMAN, SENATE CO-EXECUTIVE
DIRECTOR AND DEMOCRATIC HEAD OF RESPONDENT THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT, DATED FEBRUARY 14, 2022 [701 - 702]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 42

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

- against -

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF THE
SENATE ANDREA STEWART-COUSINS, SPEAKER
OF THE ASSEMBLY CARL HEASTIE, NEW YORK
STATE BOARD OF ELECTIONS, and THE NEW
YORK STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT.

Respondents.

Index No.: E2022-0116CV

**NOTICE TO TAKE
DEPOSITION UPON ORAL
EXAMINATION**

PLEASE TAKE NOTICE that pursuant to Article 31 of the Civil Practice Law and Rules, the deposition upon oral examination of Phillip Chonigman, Senate Co-Executive Director and Democratic head of Respondent the New York State Legislative Task Force on Demographic Research and Reapportionment, by a duly authorized representative with knowledge and information concerning the allegations contained in the Petition and Amended Petition, will be taken before an officer authorized by the laws of the State of New York to administer oaths, who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein, at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810,*** on the **22nd day of February, 2022**, at **9:00AM ET**, with

* Or another location to be agreed upon by Petitioners and recipient of this Notice.

respect to evidence material and necessary in the prosecution of this action. The examination will continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 202.15 of the Uniform Civil Rules For The Supreme Court And The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

Dated: New York, New York
February 14, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

s/ Bennet J. Moskowitz

Bennet J. Moskowitz
875 Third Avenue
New York, NY 10022
Tel: (212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

Attorneys for Petitioners

**EXHIBIT 10 TO MOSKOWITZ AFFIRMATION -
SUBPOENA DUCES TECUM AD TESTIFICANDUM TO DAVID IMAMURA,
COMMISSIONER, NEW YORK STATE INDEPENDENT REDISTRICTING
COMMISSION, DATED FEBRUARY 14, 2022 [703 - 713]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 43

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN _____ X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No.: E2022-0116CV

**SUBPOENA DUCES
TECUM AD
TESTIFICANDUM**

Petitioners,

-against-

X

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

To: **David Imamura**
Commissioner, New York State Independent Redistricting Commission
Abrams Fensterman LLP
81 Main Street
Suite 400
White Plains, NY 10601

YOU ARE COMMANDED to appear for a deposition upon oral examination at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810*** on **February 23, 2022**, beginning at **9:00 a.m. EST**, before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein. The examination will continue from day to day until completed.

NOTICE IS GIVEN that, pursuant to section 202.15 of the Uniform Civil Rules for the Supreme Court and The County Court, the deposition will be videotaped by an employee of David

* Or another location to be agreed upon by Petitioners and recipient of this Subpoena.

Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

YOU ARE FURTHER COMMANDED to produce for use at the deposition examination the documents and things identified in **Exhibit A** attached hereto. Copies of the Petition and Amended Petition filed in this action on February 3, 2022, and February 8, 2022, respectively, are attached hereto as **Exhibits B** and **C**, respectively. If you prefer to produce the documents by e-mail, you can email them to Bennet.Moskowitz@troutman.com before your deposition date.

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed \$150 and for all damages sustained by reason of your failure to comply.

Dated: New York, New York
February 14, 2022

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606

Attorneys for Petitioners

EXHIBIT A**DEFINITIONS**

For purposes of these document requests, the following definitions apply to the following words and phrases, regardless of capitalization:

1. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in the above-captioned case.

2. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

3. The term “document” means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

4. The term “Electronic Data” as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data

includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

6. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

7. The terms “you” or “your” means Elaine Frazier and all other persons acting or purporting to act for or on his/her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

8. The term “person” means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

9. The terms “all,” “any” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

2. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

3. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

4. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the document request itself.

5. You must respond fully to each document request. If you object to a document request, you must state with specificity all grounds for your objection. If an objection pertains only to a portion of a document request, or a word, phrase or clause contained therein, you must state your objection to that portion only and respond as completely as possible to the remainder of the document request. No part of any document request may be left unanswered merely because an objection is interposed to another part of the request.

6. If your answer to any document request is qualified in any manner, you must set forth the reason for and details of such qualification.

7. In the event you claim that any information called for in any document request is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or

any other privilege or immunity from disclosure, you must provide in writing the basis of such assertion.

8. A complete original or copy of each document or thing must be produced, even if only a portion of such document or thing is responsive to a document request. Documents should not be edited, cut, redacted (except where you assert a claim of attorney-client privilege, work product doctrine, or other privilege or immunity from disclosure with respect to a portion of a document), or expunged, and should include all attachments, appendices, tables and exhibits, in addition to all covering memoranda, letters, folders or documents.

9. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

10. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having

other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

11. You shall preserve and maintain all documents in their native format throughout the course of this litigation and shall specifically preserve all metadata concerning all documents.

12. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

13. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

14. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, all documents and communications you received from, or which you provided to, one or more Democratic members of the New York State Legislature, Governor Kathy Hochul, and any other Democratic Party politicians or officials, as well as any person acting or purporting to act on behalf of any of the foregoing.

2. All documents and communications concerning the subject matter of the Amended Petition.

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 43

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

EXHIBIT B

713

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 43

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

EXHIBIT C

**EXHIBIT 11 TO MOSKOWITZ AFFIRMATION -
SUBPOENA DUCES TECUM AD TESTIFICANDUM TO EUGENE BENGER,
COMMISSIONER, NEW YORK STATE INDEPENDENT REDISTRICTING
COMMISSION, DATED FEBRUARY 14, 2022 [714 - 724]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 44

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN _____ X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No.: E2022-0116CV

**SUBPOENA DUCES
TECUM AD
TESTIFICANDUM**

Petitioners,

-against-

X

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

To: **Eugene Benger**
Commissioner, New York State Independent Redistricting Commission
Debevoise & Plimpton
919 Third Avenue
New York, NY 10022

YOU ARE COMMANDED to appear for a deposition upon oral examination at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810*** on **February 23, 2022**, beginning at **9:00 a.m. EST**, before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein. The examination will continue from day to day until completed.

NOTICE IS GIVEN that, pursuant to section 202.15 of the Uniform Civil Rules for the Supreme Court and The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

* Or another location to be agreed upon by Petitioners and recipient of this Subpoena.

YOU ARE FURTHER COMMANDED to produce for use at the deposition examination the documents and things identified in **Exhibit A** attached hereto. Copies of the Petition and Amended Petition filed in this action on February 3, 2022, and February 8, 2022, respectively, are attached hereto as **Exhibits B** and **C**, respectively. If you prefer to produce the documents by e-mail, you can email them to Bennet.Moskowitz@troutman.com before your deposition date.

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed \$150 and for all damages sustained by reason of your failure to comply.

Dated: New York, New York
February 14, 2022

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606

Attorneys for Petitioners

EXHIBIT A**DEFINITIONS**

For purposes of these document requests, the following definitions apply to the following words and phrases, regardless of capitalization:

1. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in the above-captioned case.

2. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

3. The term “document” means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

4. The term “Electronic Data” as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data

includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

6. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

7. The terms “you” or “your” means Elaine Frazier and all other persons acting or purporting to act for or on his/her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

8. The term “person” means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

9. The terms “all,” “any” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

2. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

3. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

4. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the document request itself.

5. You must respond fully to each document request. If you object to a document request, you must state with specificity all grounds for your objection. If an objection pertains only to a portion of a document request, or a word, phrase or clause contained therein, you must state your objection to that portion only and respond as completely as possible to the remainder of the document request. No part of any document request may be left unanswered merely because an objection is interposed to another part of the request.

6. If your answer to any document request is qualified in any manner, you must set forth the reason for and details of such qualification.

7. In the event you claim that any information called for in any document request is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or

any other privilege or immunity from disclosure, you must provide in writing the basis of such assertion.

8. A complete original or copy of each document or thing must be produced, even if only a portion of such document or thing is responsive to a document request. Documents should not be edited, cut, redacted (except where you assert a claim of attorney-client privilege, work product doctrine, or other privilege or immunity from disclosure with respect to a portion of a document), or expunged, and should include all attachments, appendices, tables and exhibits, in addition to all covering memoranda, letters, folders or documents.

9. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

10. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having

other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

11. You shall preserve and maintain all documents in their native format throughout the course of this litigation and shall specifically preserve all metadata concerning all documents.

12. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

13. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

14. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, all documents and communications you received from, or which you provided to, one or more Democratic members of the New York State Legislature, Governor Kathy Hochul, and any other Democratic Party politicians or officials, as well as any person acting or purporting to act on behalf of any of the foregoing.

2. All documents and communications concerning the subject matter of the Amended Petition.

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FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 44

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

EXHIBIT B

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FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 44

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

EXHIBIT C

**EXHIBIT 12 TO MOSKOWITZ AFFIRMATION -
SUBPOENA DUCES TECUM AD TESTIFICANDUM TO IVELISSE CUEVAS-MOLINA,
COMMISSIONER, NEW YORK STATE INDEPENDENT REDISTRICTING COMMISSION,
DATED FEBRUARY 14, 2022 [725 - 735]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 45

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN _____ X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No.: E2022-0116CV

**SUBPOENA DUCES
TECUM AD
TESTIFICANDUM**

Petitioners,

-against-

X

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

To: **Ivelisse Cuevas-Molina**
Commissioner, New York State Independent Redistricting Commission
Fordham University, Rose Hill Campus
441 E. Fordham Road
Bronx, NY 10458
Office: 671 Faber Hall

YOU ARE COMMANDED to appear for a deposition upon oral examination at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810*** on **February 24, 2022**, beginning at **9:00 a.m. EST**, before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein. The examination will continue from day to day until completed.

* Or another location to be agreed upon by Petitioners and recipient of this Subpoena.

NOTICE IS GIVEN that, pursuant to section 202.15 of the Uniform Civil Rules for the Supreme Court and The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

YOU ARE FURTHER COMMANDED to produce for use at the deposition examination the documents and things identified in **Exhibit A** attached hereto. Copies of the Petition and Amended Petition filed in this action on February 3, 2022, and February 8, 2022, respectively, are attached hereto as **Exhibits B** and **C**, respectively. If you prefer to produce the documents by e-mail, you can email them to Bennet.Moskowitz@troutman.com before your deposition date.

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed \$150 and for all damages sustained by reason of your failure to comply.

Dated: New York, New York
February 14, 2022

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606

Attorneys for Petitioners

EXHIBIT A**DEFINITIONS**

For purposes of these document requests, the following definitions apply to the following words and phrases, regardless of capitalization:

1. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in the above-captioned case.

2. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

3. The term “document” means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

4. The term “Electronic Data” as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data

includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

6. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

7. The terms “you” or “your” means Elaine Frazier and all other persons acting or purporting to act for or on his/her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

8. The term “person” means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

9. The terms “all,” “any” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

2. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

3. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

4. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the document request itself.

5. You must respond fully to each document request. If you object to a document request, you must state with specificity all grounds for your objection. If an objection pertains only to a portion of a document request, or a word, phrase or clause contained therein, you must state your objection to that portion only and respond as completely as possible to the remainder of the document request. No part of any document request may be left unanswered merely because an objection is interposed to another part of the request.

6. If your answer to any document request is qualified in any manner, you must set forth the reason for and details of such qualification.

7. In the event you claim that any information called for in any document request is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or

any other privilege or immunity from disclosure, you must provide in writing the basis of such assertion.

8. A complete original or copy of each document or thing must be produced, even if only a portion of such document or thing is responsive to a document request. Documents should not be edited, cut, redacted (except where you assert a claim of attorney-client privilege, work product doctrine, or other privilege or immunity from disclosure with respect to a portion of a document), or expunged, and should include all attachments, appendices, tables and exhibits, in addition to all covering memoranda, letters, folders or documents.

9. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

10. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having

other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

11. You shall preserve and maintain all documents in their native format throughout the course of this litigation and shall specifically preserve all metadata concerning all documents.

12. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

13. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

14. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, all documents and communications you received from, or which you provided to, one or more Democratic members of the New York State Legislature, Governor Kathy Hochul, and any other Democratic Party politicians or officials, as well as any person acting or purporting to act on behalf of any of the foregoing.

2. All documents and communications concerning the subject matter of the Amended Petition.

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FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

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RECEIVED NYSCEF: 02/14/2022

EXHIBIT B

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FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 45

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

EXHIBIT C

**EXHIBIT 13 TO MOSKOWITZ AFFIRMATION -
SUBPOENA DUCES TECUM AD TESTIFICANDUM TO JOHN FLATEAU,
COMMISSIONER, NEW YORK STATE INDEPENDENT REDISTRICTING
COMMISSION, DATED FEBRUARY 14, 2022 [736 - 746]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 46

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN _____ X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No.: E2022-0116CV

**SUBPOENA DUCES
TECUM AD
TESTIFICANDUM**

Petitioners,

-against-

X

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

To: **John Flateau**
Commissioner, New York State Independent Redistricting Commission
Medgar Evers College
1650 Bedford Avenue
Brooklyn, NY 11225

YOU ARE COMMANDED to appear for a deposition upon oral examination at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810*** on **February 24, 2022**, beginning at **9:00 a.m. EST**, before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein. The examination will continue from day to day until completed.

NOTICE IS GIVEN that, pursuant to section 202.15 of the Uniform Civil Rules for the Supreme Court and The County Court, the deposition will be videotaped by an employee of David

* Or another location to be agreed upon by Petitioners and recipient of this Subpoena.

Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

YOU ARE FURTHER COMMANDED to produce for use at the deposition examination the documents and things identified in **Exhibit A** attached hereto. Copies of the Petition and Amended Petition filed in this action on February 3, 2022, and February 8, 2022, are attached hereto as **Exhibits B** and **C**, respectively. If you prefer to produce the documents by e-mail, you can email them to Bennet.Moskowitz@troutman.com before your deposition date.

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed \$150 and for all damages sustained by reason of your failure to comply.

Dated: New York, New York
February 14, 2022

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606

Attorneys for Petitioners

EXHIBIT A**DEFINITIONS**

For purposes of these document requests, the following definitions apply to the following words and phrases, regardless of capitalization:

1. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in the above-captioned case.

2. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

3. The term “document” means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

4. The term “Electronic Data” as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data

includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

6. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

7. The terms “you” or “your” means Elaine Frazier and all other persons acting or purporting to act for or on his/her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

8. The term “person” means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

9. The terms “all,” “any” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

2. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

3. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

4. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation, unless otherwise specifically limited in the document request itself.

5. You must respond fully to each document request. If you object to a document request, you must state with specificity all grounds for your objection. If an objection pertains only to a portion of a document request, or a word, phrase or clause contained therein, you must state your objection to that portion only and respond as completely as possible to the remainder of the document request. No part of any document request may be left unanswered merely because an objection is interposed to another part of the request.

6. If your answer to any document request is qualified in any manner, you must set forth the reason for and details of such qualification.

7. In the event you claim that any information called for in any document request is immune from discovery on the grounds of attorney-client privilege, the work product doctrine, or

any other privilege or immunity from disclosure, you must provide in writing the basis of such assertion.

8. A complete original or copy of each document or thing must be produced, even if only a portion of such document or thing is responsive to a document request. Documents should not be edited, cut, redacted (except where you assert a claim of attorney-client privilege, work product doctrine, or other privilege or immunity from disclosure with respect to a portion of a document), or expunged, and should include all attachments, appendices, tables and exhibits, in addition to all covering memoranda, letters, folders or documents.

9. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

10. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having

other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

11. You shall preserve and maintain all documents in their native format throughout the course of this litigation and shall specifically preserve all metadata concerning all documents.

12. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

13. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

14. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, all documents and communications you received from, or which you provided to, one or more Democratic members of the New York State Legislature, Governor Kathy Hochul, and any other Democratic Party politicians or officials, as well as any person acting or purporting to act on behalf of any of the foregoing.

2. All documents and communications concerning the subject matter of the Amended Petition.

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NYSCEF DOC. NO. 46

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EXHIBIT B

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NYSCEF DOC. NO. 46

INDEX NO. E2022-0116CV

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EXHIBIT C

**EXHIBIT 14 TO MOSKOWITZ AFFIRMATION -
SUBPOENA DUCES TECUM AD TESTIFICANDUM TO ELAINE FRAZIER,
COMMISSIONER, NEW YORK STATE INDEPENDENT REDISTRICTING
COMMISSION, DATED FEBRUARY 14, 2022 [747 - 757]**

FILED: STEUBEN COUNTY CLERK 02/14/2022 11:50 PM

NYSCEF DOC. NO. 47

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/14/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN _____ X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No.: E2022-0116CV

**SUBPOENA DUCES
TECUM AD
TESTIFICANDUM**

Petitioners,

-against-

X

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

To: **Elaine Frazier**
Commissioner, New York State Independent Redistricting Commission
Independent Redistricting Commission
250 Broadway, 22nd Floor
New York, NY 10007

YOU ARE COMMANDED to appear for a deposition upon oral examination at the **Steuben County Supreme & County Court, 3 East Pulteney Square, Bath, NY 14810*** on **February 25, 2022**, beginning at **9:00 a.m. EST**, before a notary public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of consanguinity or affinity to any party herein. The examination will continue from day to day until completed.

NOTICE IS GIVEN that, pursuant to section 202.15 of the Uniform Civil Rules for the Supreme Court and The County Court, the deposition will be videotaped by an employee of David Feldman Worldwide, A Veritext Company, which is located at 1250 Broadway, Suite 2400, New York, NY 10001.

* Or another location to be agreed upon by Petitioners and recipient of this Subpoena.

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YOU ARE FURTHER COMMANDED to produce for use at the deposition examination the documents and things identified in **Exhibit A** attached hereto. Copies of the Petition and Amended Petition filed in this action on February 3, 2022, and February 8, 2022, respectively, are attached hereto as **Exhibits B** and **C**, respectively. If you prefer to produce the documents by e-mail, you can email them to Bennet.Moskowitz@troutman.com before your deposition date.

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed \$150 and for all damages sustained by reason of your failure to comply.

Dated: New York, New York
February 14, 2022

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606

Attorneys for Petitioners

EXHIBIT A**DEFINITIONS**

For purposes of these document requests, the following definitions apply to the following words and phrases, regardless of capitalization:

1. “Amended Petition” means the Verified Amended Petition dated February 8, 2022 filed in the above-captioned case.

2. “Concerning,” and all tenses thereof, means referring to, relating to, constituting, describing or evidencing.

3. The term “document” means the originals, identical and non-identical copies (including all copies that are different in any way from the original, whether by interlineation, stamp, notation, indication of copy sent or received or otherwise), and drafts thereof, regardless of location, of any written, printed, photocopied, photographed, recorded, transcribed, punched, taped, emailed, filed, or graphic matter, and any other means of preserving thought or expression, of any nature or description. The term also includes all information stored in a computer system although not yet printed out, all information stored in computer hard drives, all information stored on diskettes of any kind, all information stored on computer tape backups, all information stored in e-mail, all forms of Electronic Data (as this term is defined below), and all information stored on Electronic Media (as this term is defined below).

4. The term “Electronic Data” as used herein means the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, e-mail, or other means. Electronic Data

includes, by way of example only, computer programs, programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files, regardless of the media on which they reside. Electronic Data includes any and all items stored on Electronic Media (as this term is defined below). The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. The term “Electronic Media” as used herein means any magnetic, optical or other storage media device used to record Electronic Data, either on a computer and/or data network. Electronic Media devices may include, but are not limited to, computer memories, hard disks, hard drives, optical disks, floppy disks, CD-ROM, removable media, thumb drives, magnetic tapes of all types, microfiche, microfilm, punched cards, punched tape, facsimile machine memories, voicemail and voicemail records, or any other vehicle for digital data storage and/or transmittal.

6. “Communication” means both documentary and non-documentary transmission of information or message, oral or written, regardless of: (a) the method of transmission; (b) the individual transmitting the Communication; or (c) whether the transmission was received. The term includes, but is not limited to, any form of expression, conversation, discussion, email, facsimile, letter, memorandum, meeting (however formal or informal), negotiation, notes, text message, voicemail or the like, or any Document that abstracts, digests, transcribes, records, or reflects any of the foregoing.

7. The terms “you” or “your” means Elaine Frazier and all other persons acting or purporting to act for or on his/her behalf, including, without limitation, representatives, agents, employees, attorneys, accountants and investigators.

8. The term “person” means any natural person or any legal entity, including, without limitation, any business, governmental entity, association, partnership, firm, limited liability company, or corporation.

9. The terms “all,” “any” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all responses that might otherwise be construed to be outside of their scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. Defined terms and phrases have the meanings ascribed to them above regardless of capitalization.

INSTRUCTIONS

The following instructions apply to each individual request for documents contained herein:

1. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of all of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf.

2. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in

which such documents have been maintained. All documents are to be produced along with copies of folders in which they are kept.

3. If you know of the existence, past or present, of any document requested herein, but are unable to produce such document because it is not presently in your possession, custody or control, or in the possession, custody or control of your representatives, agents, employees, attorneys, accountants, investigators and all other persons acting for you or on your behalf, you shall so state in your response and shall identify (by title, if any, nature of document and subject matter) such document and shall identify (by name, address and telephone number) the person in whose possession, custody or control the document was last known to reside.

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9. If any documents within the scope of these Requests are within the possession, custody or control of Your employees, attorneys, representatives or any other person over whom you have control, or as to which you have a right of possession or production, then these Requests require the production of such documents.

10. Where a claim of privilege is asserted in objection to any Request or subpart thereof, and any information or any document, or any portion thereof, is not provided on the basis of such assertion, in asserting the privilege You shall provide the following information in a privilege log:

- a. for documents: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document, including, without limitation, the author of the document, its date, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other;
- b. for oral communications: (i) the name of the person making the communication; (ii) the names of persons present while the communication was made or having

other access to the contents of the communication; (iii) where not apparent, the relationship of the persons present to the person making the communication; (iv) the date and place of the communication; and (v) the general subject matter of the communication.

11. You shall preserve and maintain all documents in their native format throughout the course of this litigation and shall specifically preserve all metadata concerning all documents.

12. If any document or thing called for by these Requests has been lost or destroyed, You shall identify, with respect to each document: (i) its author(s) or writer(s); (ii) its addressor(s); (iii) its addressee(s); (iv) its creation date; (v) its subject matter; (vi) its length in pages; (vii) its attachments or appendices; (viii) all persons to whom it was distributed, shown or explained; (ix) the date of the destruction or loss; (x) the person(s) authorizing or directing the destruction; (xi) the person destroying the document or the person who last had custody of the document; (xii) the nature of the document (e.g. letter, memorandum, report, etc.); and, (xiii) the reason for the destruction or loss of the document.

13. If Your response to any particular Request is that no responsive information or documents exist, then You must: (1) state in writing that You conducted a good faith search for the requested information or documents; (2) describe the extent of the search; and (3) state that, based on such search, no such information or documents exist.

14. These requests are continuing in nature. You must produce all additional responsive information and documents by way of supplemental responses.

DOCUMENT REQUESTS

1. All documents and communications concerning the drawing of the 2022 New York Congressional and state Senate districts. This includes, without limitation, all documents and communications you received from, or which you provided to, one or more Democratic members of the New York State Legislature, Governor Kathy Hochul, and any other Democratic Party politicians or officials, as well as any person acting or purporting to act on behalf of any of the foregoing.

2. All documents and communications concerning the subject matter of the Amended Petition.

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EXHIBIT C

LETTER FROM COUNSEL FOR PETITIONERS TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 14, 2022 [758 - 760]

Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com



Bennet J. Moskowitz
bennet.moskowitz@troutman.com

February 14, 2022

VIA NYSCEF

Honorable Patrick F. McAllister
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider, et al. v. Hochul, et al.*, Index No. E2022-0116CV (Sup. Ct. Steuben Cnty.)

Dear Justice McAllister:

We represent Petitioners in the referenced CPLR Art. 4 special proceeding. Today, Petitioners filed a number of items with the Court, including some pursuant to an agreement reached with Respondents concerning scheduling and word limits. We write to explain the context for these filings and to request a telephonic/video conference with Your Honor—at the Court's earliest convenience—to address the various, time-sensitive matters upon which the Parties did not reach agreement, and which could seriously and unnecessarily prejudice Petitioners.

Pursuant to the Order to Show Cause entered on February 7, 2022 (NYSCEF Doc. No. 11), the Court directed the parties to confer within seven days thereof on a schedule for expedited fact discovery and expert reports. Counsel for the parties and the New York Attorney General met and conferred by phone on February 10, 2022, and exchanged multiple emails thereafter. During the meet-and-confer, Petitioners raised issues related to fact discovery and expert reports, as well as to the need for agreement on a case schedule that accommodates the need for this Court to handle this proceeding on an expedited basis.

The parties and counsel for the Attorney General reached agreement on the following: Petitioners agreed to serve their principal brief and expert reports by today, in which case Respondents agreed they would not move to strike the brief or reports. The parties further stipulated to a 10,000-word limit for their respective principal briefs, and Petitioners get 5,000 words for their reply. See 22 NYCRR 202.8-b(d) (authorizing the Court upon letter application to permit submission of memoranda in excess of otherwise-applicable word limits). Finally, the parties agreed that, going forward, all documents not subject to filing via NYSCEF may be served on each other via email. We respectfully request that the Court So Order this portion of this letter so that the parties may forgo burdening the Court with unnecessary, additional filings in this matter.

Regarding their Petition and Expert Reports, Petitioners have filed the following items with the Court today: (1) A Memorandum Of Law In Support Of The Petition And Amended Petition, limited to 10,000 words; (2) the Expert Report Of Mr. Sean P. Trende, with attachments; (3) the Expert Report Of Claude A. LaVigna, with attachments; (4) the Affidavit Of Senate Minority Leader Robert G. Ort; and (5) the Affidavit Of Petitioner Lawrence Garvey.

Regrettably, Respondents have flatly refused to consent to Petitioners' filing of their Amended Petition (upon which consent Petitioners could have withdrawn their pending Motion for such leave), to stipulate to leave for Petitioners to seek expedited, narrowly tailored discovery, and to shorten the return date in this matter notwithstanding the forthcoming political-calendar deadlines.

Consequently, Petitioners have also filed with the Court today the following items related to their request for expedited discovery in this case: (1) the proposed Order To Show Cause Why Petitioners Should Not Be Granted Leave To Conduct Expedited Discovery; (2) the Memorandum Of Law In Support Of Petitioners' Motion For Leave To Conduct Expedited Discovery; and (3) the Affirmation Of Attorney Bennet J. Moskowitz In Support Of Petitioners' Proposed Order To Show Cause Why Petitioners Should Not Be Granted Leave To Conduct Expedited Discovery, with attachments. Petitioners' proposed discovery requests require the recipients to respond prior to the March 3, 2022 return date currently set in this case.

Moreover, Petitioners seek the aforementioned Court conference in part to obtain the Court's guidance on Petitioners' desired relief from this Court, at least on an interim basis, from the impending March 1, 2022 petition-signature deadlines for the 2022 primary elections, see N.Y. Election Law §§ 6-134(4), 6-158(1), so as to avoid candidates' needless collection of signatures to run for office in districts of extremely questionable legal propriety.

HONORABLE PATRICK F. McALLISTER
February 14, 2022
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Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP

KEYSER MALONEY &
WINNER LLP

By: 

Bennet J. Moskowitz, Reg. No. 4693842
875 Third Avenue
New York, New York 10022
(212) 704-6000
bennet.moskowitz@troutman.com

By: s/ George H. Winner, Jr.

George H. Winner, Jr., Reg. No. 1539238
150 Lake Street
Elmira, New York 14901
(607) 734-0990
gwinner@kmw-law.com

By: 

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

CC: All Counsel Of Record (via NYSCEF and email)

LETTER FROM ERIC HECKER, ESQ. TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 15, 2022 [761 - 765]

CUTI HECKER WANG LLP

305 BROADWAY, SUITE 607
NEW YORK, NY 10007

ERIC HECKER
212.620.2602 TEL
212.620.2612. FAX

EHECKER@CHWLLP.COM

February 15, 2022

By E-Filing

Hon. Patrick F. McAllister
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider et al. v. Hochul et al.*, Index No. E2022-0116CV

Dear Justice McAllister:

We represent the Senate Majority Leader in this special proceeding. We write to respond to the letter that Petitioners filed at 11:54 p.m. last night (Docket No. 49) requesting that the Court schedule a conference. For the following reasons, we respectfully submit that no conference is necessary, nor would holding a conference be appropriate.

Until late last night, there were two things pending before the Court: (i) the Petition and (ii) Petitioners' motion for leave to file an Amended Petition. Per the Court's February 9, 2022 Order to Show Cause, the Petition and the motion for leave to amend the Petition are both returnable on March 3, 2022; Respondents' papers in opposition to the Petition and the motion to amend the Petition are due by February 24, 2022; and Petitioners' reply papers are due by March 1, 2022.

Late last night, Petitioners filed a purported memorandum of law, two purported expert reports, and two purported witness affidavits in ostensible further support of the Petition. As we discussed with Petitioners during our February 10, 2022 meet and confer session and subsequent email communications, it was improper for Petitioners to wait *eleven days* after commencing this special proceeding to serve a memorandum of law, expert reports, and evidence in support of their Petition. The special proceeding that Petitioners chose to commence "is analogous to a motion and is designed to go to a hearing and determination promptly." Siegel, *New York Practice* § 554 (6th ed. 2021). On the return date, "the court shall make a summary determination upon the pleadings, papers, and admissions to the extent that no triable issues of fact are raised." CPLR 409(b). The procedure "is analogous to what the court does on an ordinary summary judgment motion within an action." Siegel, *New York Practice, supra*, § 556. "Thus, every hearing of a special proceeding is equivalent to the hearing of a motion for summary judgment and makes a formal motion for same unnecessary." *Buckley v.*

February 15, 2022
Page 2 of 5

Zoning Board of Appeals of City of Geneva, 189 A.D.3d 2080, 2081 (4th Dep't 2020). Petitioners should have submitted all of their moving papers together with their Petition eleven days ago. Indeed, we do not read either of the Court's two Orders to Show Cause to permit Petitioners to serve additional papers in ostensible support of the Petition other than the reply papers that the Court directed them to file by March 1, 2022.

Although there is a compelling basis for Respondents to move to strike Petitioners' belated and unauthorized memorandum of law, expert reports, and affidavits, and although it will be challenging for Respondents to file papers in opposition to those belated and unauthorized filings by the February 24, 2022 deadline set in the Court's second Order to Show Cause, we previously told Petitioners that we would refrain from moving to strike, and that we would not seek to extend the February 24, 2022 opposition deadline, if Petitioners filed all papers in support of the Petition by yesterday, thereby giving Respondents ten days to respond. Petitioners agreed to that proposal.

There thus is nothing for the Court to discuss with the parties regarding the schedule governing the Petition or the motion to amend the Petition. All of Petitioners' moving papers have been filed, Respondents' opposition papers are due by February 24, 2022, Petitioners' reply papers are due by March 1, 2022, and the return date is March 3, 2022.

The only decision that currently is ripe for the Court's consideration is the schedule for hearing Petitioners' new motion for leave to conduct expedited discovery, which Petitioners filed by Order to Show Cause at 11:52 p.m. last night. With respect to the return date on that motion, the Court has no discretion to set any return date other than the return date for the Petition: "Motions in a special proceeding, made before the time at which the petition is noticed to be heard, shall be noticed to be heard at that time." CPLR 406. This CPLR provision makes clear that any motions in this special proceeding "shall" be heard on the March 3, 2022 return date. It is hornbook law that if a motion in a special proceeding "is made before the return day of the proceeding itself, it *must* be made returnable at the same time." Siegel, *New York Practice* § 554 (6th ed. 2021) (citing CPLR 406; emphasis added); Patrick Connors, *Practice Commentaries* CPLR § 2221, C221:4 ("CPLR 406 also requires that a motion made in the context of a special proceeding be made returnable at the same time as the special proceeding"); Vincent Alexander, *Practice Commentaries* CPLR 406 (the return date of a motion in a special proceeding "is to be set for the hearing on the petition"). Petitioners therefore are free to make any motion they believe is appropriate, so long as they notice it to be returnable on the March 3, 2022 return date that the Court has fixed for the Petition. Indeed, because there still are sixteen days before the March 3, 2022 return date, and because the Court has no discretion to set any other return date for the new motion, Respondents could have moved for expedited discovery by ordinary motion under CPLR 2214(b).

February 15, 2022
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With respect to the deadline for Respondents to submit papers in opposition to Petitioners' motion for expedited discovery, we respectfully request that the Court order such papers to be served by February 24, 2022, the same deadline for responding to the pending Petition and the pending motion to amend. It is well established that disclosure is not permitted in a special proceeding – at all, much less on an expedited basis – without leave of Court. See CPLR 408 (“Leave of court shall be required for disclosure except for a notice under section 3123.”); *Aylward v. Assessor, City of Buffalo Bd. of Assessment Review for City of Buffalo*, 125 A.D.3d 1344, 1345 (4th Dep’t 2015) (reversing Supreme Court’s grant of certain discovery because party failed to meet burden of showing discovery was necessary to prepare their defense), *appeal dismissed*, 25 N.Y.3d 1056; *Town of Wallkill v. N.Y. State Bd. of Real Prop. Servs.*, 274 A.D.2d 856, 860 (3d Dep’t 2000) (petitioner was not entitled to any of the requested discovery, having failed to “establish[] that [it was] essential to establish its position”); *People v. Condor Pontiac, Cadillac, Buick and GMC Trucks, Inc.*, Index Nos. 02–1020, 19–02–0497, 2003 WL 21649689, at *4 (Sup. Ct. N.Y. Cnty. 2003) (noting that “[a] party seeking discovery in a [special] proceeding carries a heavy burden to justify its use” and that the party “must demonstrate special or unusual circumstances which would justify permitting discovery”). Respondents’ reasons for opposing Petitioners’ motion for expedited discovery are of course beyond the scope of this letter. We note, however, that although Petitioners assert that they are seeking only “limited” discovery, Petitioners’ proposed discovery demands include a shockingly broad demand for “All Documents and Communications concerning the subject matter of the Amended Petition,” thereby implicating a potentially extreme and impossible burden of production on Respondents, significant issues regarding legislative privilege and other potentially applicable privileges, and other serious issues that could not possibly be addressed adequately on anything close to the schedule Petitioners’ appear to be urging.

We note further that Petitioners’ motion for expedited discovery is not accompanied by the Affirmation of Good Faith that subsections (a) and (c) of Rule 202.7(a) expressly require. During the parties’ first meet and confer session, which took place on February 10, 2022, Respondents asked Petitioners to describe the documents they would be seeking and to identify the witnesses they would be seeking to depose. Not only were Petitioners unprepared to answer those questions, they declined even to identify the number of depositions they would be seeking to take. The parties agreed that Petitioners would follow up later in the day with an initial written proposal, which they did. Respondents’ response to that initial proposal included, among other things, expressing concern about the breadth of Petitioners’ initial proposal and the impossibility of doing what Petitioners seemed to be contemplating on a compressed schedule. Respondents nevertheless emphasized in writing that they would continue to seek compromise and welcomed further discussions. Petitioners responded by promising to “carefully consider[]” the concerns Respondents had expressed, but Petitioners never followed up and never sought to meet and confer further, which apparently explains their failure to submit

February 15, 2022
Page 4 of 5

the required Affirmation of Good Faith, and which is reason enough to deny their motion. *See, e.g., See Baez v. Sugrue*, 300 A.D.2d 519, 521 (4th Dep't 2006) (reversing as abuse of discretion trial court's grant of motion to compel because the movant failed to submit a compliant affirmation of good faith as required by Rule 202.7); *Yargeau v. Lasertron*, 74 A.D.3d 1805, 1806 (4th Dep't 2010) (same).

To repeat, Respondents' bases for opposing Petitioners' motion for expedited discovery are beyond the scope of this letter and will be addressed in detail in Respondents' forthcoming opposition papers. For the moment, we merely are giving the Court a sense of the weighty issues that this motion implicates and asking the Court to direct Respondents to file their opposition papers by February 24, 2022.

Petitioners' letter also alludes to a potential injunction enjoining imminent election deadlines. Interfering with an election process on the eve of its commencement is forbidden. *See Purcell v. Gonzalez*, 549 U.S. 1 (2006) ("Court orders affecting elections, especially conflicting orders, can themselves result in voter confusion and consequent incentive to remain away from the polls."); *In re Khanoyan*, 65 Tex. Sup. Ct. J. 207, 2022 WL 58537 (Jan. 6, 2022) (denying challenge to redistricting for 2022 election because of the timing of the election and nature of the relief sought); *Alliance for Retired Americans v. Secretary of State*, 240 A.3d 45 (Maine 2020) (denying injunctive relief, and holding that court should not alter rules on the eve of election). Notably, Petitioners have not moved for an injunction, and this issue has not been briefed beyond a single paragraph at the end of the Memorandum of Law that Petitioners belatedly filed last night. As explained above, this issue, along with any others, must be heard on the March 3, 2022 return date. It would be highly improper for the Court to address such a fraught issue as enjoining imminent statutory election deadlines, which has not been briefed or addressed at all by Respondents, at an informal teleconference that itself is not even permitted under CPLR 406.

Counsel for the Speaker of the Assembly approves of and joins this letter. We respectfully suggest that it would be prudent for the Court to afford the Attorney General a reasonable opportunity to be heard before taking any action.

For the foregoing reasons, we respectfully request that the Court set a March 3, 2022 return date for Petitioners' motion for expedited discovery and direct Respondents to file opposition papers by February 24, 2022. We further respectfully request that the Court deny Petitioners' request for a conference, which is not necessary and would not be appropriate. We thank the Court for its attention to this letter.

February 15, 2022
Page 5 of 5

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Eric Hecker', written over a horizontal line.

Eric Hecker

cc: All Counsel of Record

LETTER FROM COUNSEL FOR PETITIONERS TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 15, 2022 [766 - 769]

Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com



Bennet J. Moskowitz
bennet.moskowitz@troutman.com

February 15, 2022

VIA NYSCEF

Honorable Patrick F. McAllister
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider, et al. v. Hochul, et al.*, Index No. E2022-0116CV (Sup. Ct. Steuben Cnty.)

Dear Justice McAllister:

We represent Petitioners in the referenced CPLR Article 4 special proceeding and write in response to the letter of Respondent the Senate Majority Leader (“Majority Leader”) filed earlier today. The Majority Leader’s letter makes a number of legally and factually unsupported assertions, all of which demonstrate her desire to delay this expedited litigation regarding Respondents’ blatantly partisan-gerrymandered redistricting maps. Petitioners respond to each of the Majority Leader’s erroneous assertions in turn.

First, and remarkably, the Majority Leader claims Your Honor lacks authority even to schedule a telephonic/video conference, without providing any support for that bizarre, nonsensical position. Maj. Leader Ltr. at 1–2, 4. There are multiple pending, time-sensitive, and important matters upon which the parties could not agree and, therefore, that require Your Honor’s prompt attention. Most prominently—and as explained more fully below—Petitioners have indeed already requested that this Court stay the upcoming March 1, 2022 date for when candidates may begin collecting petition signatures to be placed on the ballot, N.Y. Elec. Law §§ 6-134(4), 6-158(1); see NYSCEF Doc. No.1 ¶ 34 & at 67 ¶ F; NYSCEF Doc. No.18 ¶ 36 & 82 ¶ F, and have requested that the Court order expedited discovery from Respondents, NYSCEF Doc. No.48 at 1–3. That the Majority Leader seeks to avoid even a straightforward scheduling conference before Your Honor on these and other pressing matters betrays her desire to delay this crucially important litigation and avoid scrutiny—judicial and otherwise—at all costs.

Second, the Majority Leader complains about Petitioners’ filing of their Memorandum of Law In Support Of The Petition And Amended Petition, their supporting Expert Reports, and their other supporting papers—all of which were submitted with the Court yesterday. Maj. Leader Ltr. at 1–2. The Majority Leader is unable to identify any prohibition on Petitioners’ filing their

supporting papers in advance of the Return Date on the Petition. To the exact contrary, CPLR 409(a) provides only that parties must “furnish to the court all papers served . . . [u]pon the hearing.”

In any event, as Petitioners noted in their accompanying letter also filed with the Court yesterday, Respondents *expressly agreed* that they would not move to strike these papers, so long as Petitioners filed them by yesterday’s date. NYSCEF Doc. No.49 at 1. Petitioners honored that agreement, putting in a remarkable amount of work in a short period of time—which is especially notable given that Respondents only released their redistricting maps to the world two weeks ago, and of course adopted them even more recently than that. NYSCEF Doc. No.25 at 8. In light of that agreement between the parties, all of the Majority Leader’s complaints of procedural impropriety and her cited case law—which does not support her, regardless, *see Buckley v. Zoning Bd. of Appeals*, 189 A.D.3d 2080, 2081 (4th Dep’t 2020) (reciting general proposition that special-proceeding hearings are equivalent to summary-judgment hearings)—are irrelevant and ring hollow.

Third, the Majority Leader argues that this Court has no authority to expedite Petitioners’ requested discovery, Maj. Leader Ltr. at 1–2, but that is obviously incorrect. As Petitioners explained in their Memorandum supporting their requested discovery here, this Court has broad discretion to order discovery from Respondents on an expedited timeline. NYSCEF Doc. No.48 at 4–5 (citing CPLR §§ 3106(b), 3107; *Rational Strategies Fund v. Hill*, 977 N.Y.S.2d 669, 669 (Sup. Ct. N.Y. Cnty. 2013) (citing *J.G. v. Zachman*, 34 A.D.3d 1277 (4th Dep’t. 2006))). Petitioners’ Memorandum of Law in support of their Motion for leave to conduct expedited discovery explains the very compelling reasons for this Court to exercise that discretion and order expedited discovery in this case. NYSCEF Doc. No.48 at 5–9. Among other things, the New York Constitution explicitly states that redistricting cases like Petitioners’ case here take “precedence . . . over all other causes and proceedings,” and it further provides that the Court “shall render its decision within sixty days after a petition is filed.” N.Y. Const. art. III, § 5. Thus, under this straightforward constitutional text, this Court and all the parties must resolve this case expeditiously, including by completing any necessary discovery on an accelerated timeline.

Fourth, the Majority Leader complains that Petitioners, whose counsel signed and filed a letter explaining the meet and confer process in detail, did not file also file a duplicative affirmation of good faith along with their Order to Show Cause for why Petitioners should be granted leave to conduct expedited discovery. Maj. Leader Ltr. at 3–4 (citing 22 NYCRR 202.7). However, there is no requirement that Petitioners file such an affirmation under the circumstances here (*i.e.*, a motion for leave to pursue discovery in a special proceeding), because 22 NYCRR 202.7 applies only when a party asks the court to resolve disputes surrounding the *production and other ongoings* of discovery, which Petitioners’ proposed Order to Show Cause to seek discovery does not ask this Court to do. *See, e.g., Amherst Synagogue v. Schuele Paint Co.*, 30 A.D.3d 1055, 1057 (4th Dep’t 2006); *Eaton v. Chahal*, 553 N.Y.S.2d 642, 645 (Sup. Ct. Rensselaer Cnty. 1990). Rather, Petitioners are seeking leave to conduct discovery in the first place. None of the the case law that the Majority Leader cites contradicts this point. *See* Maj. Leader Ltr. at 4; *Baez v. Sugrue*,

300 A.D.2d 519, 520–21 (4th Dep’t 2006); *Yargeau v. Lasertron*, 74 A.D.3d 1805, 1806 (4th Dep’t 2010). Nevertheless, to avoid frivolous litigation on this issue and any further, needless delay—both of which appear to be what Respondents desire rather than engaging in the merits—Petitioners have today (*i.e.*, well before the return date) filed an Affirmation Of Good Faith with the Court under 22 NYCRR 202.7. Therefore, this issue—which is a wasteful distraction anyway—is now moot.

Fifth, the Majority Leader’s assertion that *Purcell v. Gonzales*, 549 U.S. 1 (2006) (*per curiam*), forecloses this Court’s ability to enjoin or stay the impending election-related deadlines during the pendency of this Court’s consideration of the Petition is plainly incorrect, and cuts entirely against Respondents. See Maj. Leader Ltr. at 4. The “*Purcell* principle” precludes “lower federal courts” from “alter[ing] the election rules [of a State] on the eve of an election,” given the confusion that such alteration would cause, *Republican Nat’l Comm. v. Democratic Nat’l Comm.*, 140 S. Ct. 1205, 1207 (2020) (*per curiam*) (emphasis added); see also *Merrill v. Milligan*, No. 21A375, 2022 WL 354467 at *2 (U.S. Feb. 7, 2022) (Kavanaugh, J., concurring). *Purcell* does not bar a state court like this Court from enforcing its State’s election-law-related constitutional provisions. See, *e.g.*, *Republican Party of Pa. v. Boockvar*, 141 S. Ct. 1 (2020); *Democratic Nat’l Comm v. Wis. State Legislature*, 141 S. Ct. 28 (2020).

That said, *Purcell* strongly supports Petitioners’ request. Petitioners made their request for injunctive relief against certain early election-activity deadlines *before those deadlines even began*, see N.Y. Elec. Law § 6-134(4), and well before actual voting, *id.* § 8-600(1), thus they are not seeking to alter election rules “on the eve of an election,” *Republican Nat’l Comm.*, 140 S. Ct. at 1207. Further, Petitioners’ request seeks to *avoid* election confusion, *id.*, since it would eliminate the need for candidates to seek signatures to run for office in unconstitutionally gerrymandered districts that must be redrawn, per the Petition’s claims here. NYSCEF Doc. No. 1 ¶¶ 34, at 65–67; NYSCEF Doc. No.25 at 56–57. Notably, the New York Constitution *requires* this Court to adjudicate the Petition within 60 days, thus this Court must render its judgment to be effective *this election cycle*. N.Y. Const. art. III, § 5. *Purcell* thus weighs powerfully *in favor* of this Court enjoining these election-related deadlines now, given this mandatory 60-day constitutional deadline, so as to minimize any possible voter confusion.

Finally, the Majority Leader’s assertion that Petitioners have not moved for an injunction against N.Y. Elec. Law § 6-134(4) or any other impending election-related deadlines is misleading. Maj. Leader Ltr. at 4. Petitioners commenced this action by filing a Petition (and mere days later a proposed Amended Petition) that explicitly requests such injunctive relief, NYSCEF Doc. No.1 ¶¶ 34 & at 67 ¶ F, and their Memorandum Of Law reiterates that same request, NYSCEF Doc. No.25 at 56–57, thus the filing of an additional motion for an injunction would have been both unnecessary and cumulative. And while the Majority Leader criticizes Petitioners’ Memorandum Of Law In Support Of The Petition briefing on this issue as too short, Maj. Leader Ltr. at 4, that is deeply unfair given that the need for such injunctive relief is so obvious. Specifically, Respondents’ redistricting maps here are blatantly unconstitutional, N.Y. Const.

Honorable Patrick F. McAllister
February 15, 2022
Page 4



art. III, § 4(c), thus there is no sense in requiring candidates to gather signatures in order to run for elected office from districts that will surely be redrawn, NYSCEF Doc. No.25 at 56–57.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bennet J. Moskowitz".

Bennet J. Moskowitz

A handwritten signature in blue ink, appearing to read "Misha Tseytlin".

Misha Tseytlin

cc: All Counsel Of Record (via NYSCEF and email)

AFFIRMATION OF GOOD FAITH BY BENNET J. MOSKOWITZ, ESQ.,
FOR PETITIONERS, DATED FEBRUARY 15, 2022 [770 - 773]

FILED: STEUBEN COUNTY CLERK 02/15/2022 08:18 PM

NYSCEF DOC. NO. 53

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/15/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND MARIANNE
VOLANTE,

Index No. E2022-0116CV

AFFIRMATION OF GOOD FAITH

Petitioners,

Mot. Seq. # 003

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, AND THE NEW YORK
STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT,

Respondents.

-----X

BENNET J. MOSKOWITZ, an attorney admitted to practice in the State of New York,

hereby affirms under the penalties of perjury as follows:

1. I am a Partner at Troutman Pepper Hamilton Sanders LLP, attorneys for Petitioners in this CPLR Art. 4 special proceeding.

2. I submit this Affirmation of Good Faith pursuant to 22 NYCRR § 202.7 to attest to the good faith efforts made in connection with Petitioners' Motion For Leave To Conduct Expedited Discovery (Mot. Seq. # 003).*

3. On February 3, 2022, Petitioners, electors in the State of New York, commenced this special proceeding to challenge, *inter alia*, the validity of the Legislature's new congressional map ("2022 congressional map"). *See* Petition, NYSCEF Doc. No. 1. On February 8, 2022, Petitioners submitted a still-pending proposed Amended Petition, adding, in relevant part, their challenge to the new state Senate map ("2022 state Senate map"). *See* Proposed Amended Petition, NYSCEF Doc. No. 18, ¶¶ 179–212.

4. This Court's initial Order To Show Cause, entered on February 7, 2022, required the parties to "confer . . . on a schedule for expedited fact discovery and expert reports." Order To Show Cause, NYSCEF Doc. No. 11 at 4.

5. On February 10, 2022, consistent with this Court's February 7 Order To Show Cause, Petitioners and Respondents held a lengthy telephonic meet-and-confer session, during which they discussed Petitioners' proposed discovery requests. At that meeting, counsel for Respondents contended that these proceedings did not contemplate any discovery whatsoever other than notices to admit, and that counsel was unsure how *any* additional discovery could work, given both Respondents' privilege concerns and practical considerations regarding such additional discovery's incompatibility with the form of these proceedings. Nevertheless, Petitioners agreed

* As discussed in Petitioners' contemporaneously filed letter to the Court dated February 15, 2022, and contrary to Respondents' suggestion, Petitioners are not required to submit an Affirmation of Good Faith under the present circumstances. Nevertheless, Petitioners hereby submit this Affirmation of Good Faith in an abundance of caution, without conceding that such submission is required.

to provide Respondents a detailed proposal of the discovery Petitioners contemplated, in good faith efforts to come to a reasonable agreement on the scope of discovery.

6. Later that day, Petitioners provided Respondents with a detailed, written proposal of their contemplated discovery requests, including party and non-party document discovery and depositions.

7. Respondents rejected Petitioners' discovery proposal outright, refusing to consent to any such discovery in this matter and instead declaring in substance that Petitioners would have to seek leave to pursue any and all discovery other than notices to admit.

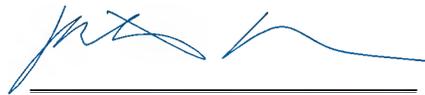
8. Given Respondents' blanket refusal to consent to any discovery beyond notices to admit, and given the exigent nature of this special proceeding, which exigency is set forth in the New York Constitution itself, Petitioners determined in good faith that further discussions concerning the discovery issues would be futile and untenable.

9. Thus, on February 14, 2022, Petitioners filed their Proposed Order To Show Cause Why Petitioners Should Not Be Granted Leave To Conduct Expedited Discovery, which this Court entered the next day. NYSCEF Doc. No. 51.

10. I respectfully submit that counsel for Petitioners made a good faith effort to resolve the issues raised in Petitioners' Motion For Leave To Conduct Expedited Discovery (Mot. Seq. # 003), before filing it.

WHEREFORE, Petitioners respectfully request that the relief requested in their Motion For Leave To Conduct Expedited Discovery (Motion Seq. #003) be in all respects granted, together with any such further relief as the Court deems just and proper.

Dated: New York, New York
February 15, 2022



BENNET J. MOSKOWITZ

LETTER FROM BRIAN L. QUAIL TO HONORABLE PATRICK F. MCALLISTER,
DATED FEBRUARY 16, 2022

Peter S. Kosinski
Co-Chair

Anthony Casale
Commissioner

Todd D. Valentine
Co-Executive Director

Kimberly A. Galvin
Co-Counsel



STATE BOARD OF ELECTIONS
40 NORTH PEARL STREET, 5th FLOOR
ALBANY, N.Y. 12207-2729
Phone: 518/474-1953 Fax: 518/474-1008
www.elections.ny.gov

Douglas A. Kellner
Co-Chair

Andrew J. Spano
Commissioner

Kristen Zebrowski Stavisley
Co-Executive Director

Brian L. Quail
Co-Counsel

February 16, 2022

Hon. Patrick F. McAallister
A. Supreme Court Justice
3 East Pulteney Square
Bath, New York 14810

RE: Tim Harkenrider, et. al. v Governor Kathy Hochul, et. al.
Index No: E2022-0116CV

Dear Judge McAllister :

The State Board of Elections will not be taking a position on the merits of this matter.

We will be available, however, to provide all parties and/or the Court with any factual information that may be needed regarding the political calendar or any other relevant issue.

Please contact me if you have any questions or require any additional information.

Very truly yours,

s/

Brian L. Quail
Counsel

775

**AFFIDAVITS OF SERVICE OF THE PETITION, ORDER TO SHOW CAUSE,
AND AFFIRMATION IN SUPPORT, SWORN TO FEBRUARY 9, 2022
AND FEBRUARY 11, 2022 [775 - 797]**

FILED: STEUBEN COUNTY CLERK 02/17/2022 09:58 AM

~~AFFIDAVIT OF SERVICE~~

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 56

INDEX #: E2022-0116CV

RETURN DATE: 02/24/2022 @ 9:30AM

ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP

875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL

PETITIONERS,

-AGAINST-

GOVERNOR KATHY HOCHUL, ET AL

RESPONDENTS.

STATE OF NEW YORK:

COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on **02/08/2022, 10:13AM** at **STATE CAPITOL BUILDING, 2ND FLOOR LOBBY, ALBANY, NY 12224**, deponent served a **PETITION, SIGNED ORDER TO SHOW CAUSE, [PROPOSED] ORDER TO SHOW CAUSE, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE AND EXHIBITS A-F, REQUEST FOR JUDICIAL INTERVENTION, REQUEST FOR JUDICIAL INTERVENTION ADDENDUM, AND NOTICE OF ELECTRONIC FILING** upon **GOVERNOR KATHY HOCHUL**, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with **DENISE GAGNON**, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of **NEW YORK**.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex **F** Approximate age **53** Approximate height **5'04"** Approximate weight **130** Color of skin **WHITE** Color of hair **BROWN**

Sworn to before me on 02/09/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026

David Post

X Stef Marie

STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:00 AM
AFFIDAVIT OF SERVICE

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 57
INDEX #: E2022-0116CV
RETURN DATE: 02/24/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on 02/08/2022, 10:27AM at STATE CAPITOL BUILDING, ROOM 246, ALBANY, NEW YORK 12224, deponent served a PETITION, SIGNED ORDER TO SHOW CAUSE, [PROPOSED] ORDER TO SHOW CAUSE, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE AND EXHIBITS A-F, REQUEST FOR JUDICIAL INTERVENTION, REQUEST FOR JUDICIAL INTERVENTION ADDENDUM, AND NOTICE OF ELECTRONIC FILING upon LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with PHIL GILTWER, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:
Sex **M** Approximate age **55** Approximate height **6'00"** Approximate weight **170** Color of skin **WHITE** Color of hair **BALD**

Sworn to before me on 02/09/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026

David Post

X Stef Marie

STEF MARIE

SERVING BY IRVING INC.
18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:00 AM

NYSCEF DOC. NO. 57

FILED: STEUBEN COUNTY CLERK 02/07/2022 09:19 AM

NYSCEF DOC. NO. 11

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/07/2022

At IAS Part ___ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the ___ day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
~~AND PRESIDENT PRO TEMPORE OF THE SENATE~~
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X



Phil

GILTNER

Index No. 1100-0116CV

ORDER TO SHOW CAUSE

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:02 AM
AFFIDAVIT OF SERVICE

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 58
INDEX #: **E2022-0116CV**
RETURN DATE: **02/24/2022 @ 9:30AM**
ATTORNEY: **TROUTMAN PEPPER HAMILTON SANDERS LLP**
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on **02/08/2022, 10:57AM** at **188 STATE STREET, LOBBY, ALBANY, NY 12247**, deponent served a **PETITION, SIGNED ORDER TO SHOW CAUSE, [PROPOSED] ORDER TO SHOW CAUSE, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE AND EXHIBITS A-F, REQUEST FOR JUDICIAL INTERVENTION, REQUEST FOR JUDICIAL INTERVENTION ADDENDUM, AND NOTICE OF ELECTRONIC FILING** upon **SENATE MAJORITY LEADER AND PRESIDENT PRO TEMPORE OF THE SENATE ANDREA STEWART-COUSINS**, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with **ADELA CODLON**, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex **F** Approximate age **31** Approximate height **5'05"** Approximate weight **135** Color of skin **WHITE** Color of hair **BLACK**

Sworn to before me on 02/09/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



X 
_____ STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, et al.

INDEX NUMBER: E2022-0116CV

vs

Plaintiff

GOVERNOR KATHY HOCHUL, et al.

Defendant

AFFIDAVIT OF SERVICE

State of New York }
County of New York } ss.:

The undersigned, being duly sworn, deposes and says;

Deponent is not a party herein, is over 18 years of age and resides in Rye Brook, New York

That on 02/08/2022 at 12:29 PM at 1446 E Gun Hill Rd., Bronx, NY 10469

deponent served a(n) **Notice of Electronic Filing, Order to Show Cause, Petition, Request for Judicial Intervention, Affirmation in Support of of Petitioners' Order to Show Cause with Exhibits A-F, Request for Judicial Intervention Addendum** on **Carl Heastie**

by delivering thereat a true copy of each to "**Jane Doe**" (**Refused to Give First Name and Last Name**) [**Co-Worker**], a person of suitable age and discretion. Said premises is defendant's actual place of business within the state.

Within 20 days of such delivery, deponent mailed a copy of same by first class mail in a postpaid envelope properly addressed to defendant at defendant's actual place of business at **1446 E Gun Hill Rd., Bronx, NY 10469**. The envelope bore the legend "Personal and Confidential" and did not indicate on the outside thereof, by return address or otherwise, that the communication was from an attorney or concerned an action against the defendant.

Mailed Copy on 02/08/2022

c/o New York Assembly Member Carl E Heastie

Description of Person Served:

Gender: Female

Skin: Black

Hair: Brown

Age: 22 - 35 Yrs.

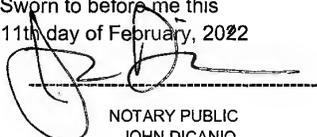
Height: 5' 4" - 5' 8"

Weight: 100-130 Lbs.

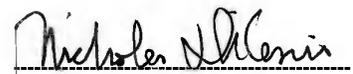
Other: **I spoke with a female through intercom at the glass door. She confirmed that Carl Heastie works here, but she refused to open the door. She refused to give her first name and last name. I left the Order to Show Cause with supporting documents at the door and announced service.**

MILITARY SERVICE: Upon information and belief based upon the conversation(s) and observation(s) as aforesaid deponent avers that the defendant is not in the military service of the State of New York or the United States as that term is defined in the statutes of the State of New York or the Federal Soldiers and Sailors Civil Relief Act.

Sworn to before me this
11th day of February, 2022



NOTARY PUBLIC
JOHN DICANIO
NOTARY PUBLIC STATE OF NEW YORK
WESTCHESTER COUNTY
LIC. # 01D1497768
COMM EXP. 2/11/2023



Nicholas DiCanio
License No. 1422308

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:04 AM
AFFIDAVIT OF SERVICE

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 60
INDEX #: E2022-0116CV
RETURN DATE: 02/24/2022 @ 9:30AM
ATTORNEY: **TROUTMAN PEPPER HAMILTON SANDERS LLP**
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on **02/08/2022, 11:49AM** at **40 NORTH PEARL STREET, SUITE 5, ALBANY, NY 12207**, deponent served a **PETITION, SIGNED ORDER TO SHOW CAUSE, [PROPOSED] ORDER TO SHOW CAUSE, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE AND EXHIBITS A-F, REQUEST FOR JUDICIAL INTERVENTION, REQUEST FOR JUDICIAL INTERVENTION ADDENDUM, AND NOTICE OF ELECTRONIC FILING** upon **NEW YORK STATE BOARD OF ELECTIONS**, a respondent in the above captioned matter.

By delivering to and leaving with **BRIAN QUAIL** at the above address and that deponent knew the person so served to be the agent duly authorized to accept service of process on behalf of the **NEW YORK STATE BOARD OF ELECTIONS**.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex **M** Approximate age **59** Approximate height **5'08"** Approximate weight **150** Color of skin **WHITE** Color of hair **BROWN**

Sworn to before me on 02/09/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



X 
_____ STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:04 AM

NYSCEF DOC. NO. 60

FILED: STEUBEN COUNTY CLERK 02/07/2022 09:19 AM

NYSCEF DOC. NO. 11

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022
INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/07/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 11th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E-2022-0116CV

ORDER TO SHOW CAUSE

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

RECEIVED - NYSBDE
FEB 8 '22 AM 11:49

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, et al.

INDEX NUMBER: E2022-0116CV

vs

Plaintiff

GOVERNOR KATHY HOCHUL, et al.

Defendant

AFFIDAVIT OF SERVICE

State of New York }
County of New York } ss.:

The undersigned, being duly sworn, deposes and says;

Deponent is not a party herein, is over 18 years of age and resides in New York, New York

That on 2/10/2022 at 1:45 PM at 28 Liberty Street, 16th fl., New York, NY 10005

deponent served a(n) Notice of Electronic Filing, Order to Show Cause, Petition, Request for Judicial Intervention, Affirmation in Support of of Petitioners' Order to Show Cause with Exhibits A-F, Request for Judicial Intervention Addendum

on New York State Attorney General, a domestic corporation,

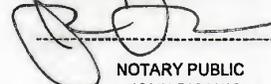
by delivering thereat a true copy of each to Lynette Stone personally,

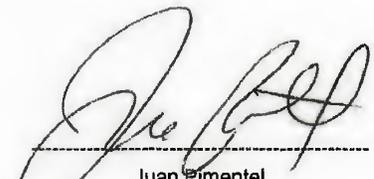
deponent knew said corporation so served to be the corporation described in said documents as said defendant and knew said individual to be authorized to accept service thereof.

Description of Person Served:

Gender : Female
Skin : Black
Hair : Black
Age : 51 - 65 Yrs.
Height : 5' 4" - 5' 8"
Weight : Over 200 Lbs.
Other : Glasses

Sworn to before me this
11th day of February, 2022


NOTARY PUBLIC
JOHN DICANIO
NOTARY PUBLIC STATE OF NEW YORK
WESTCHESTER COUNTY
LIC. # 01D1487768
COMM EXP. 2/11/2023


Juan Pimentel
License No. 2066974

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:08 AM

NYSCEF DOC. NO. 11 FILED: STEUBEN COUNTY CLERK 02/07/2022 09:19 AM

NYSCEF DOC. NO. 11

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

RECEIVED NYSCEF: 02/07/2022

At LAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 7th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

ORDER TO SHOW CAUSE

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

2022 FEB 10 PM 1:45

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:10 AM
~~AFFIDAVIT OF SERVICE~~

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 63
INDEX #: E2022-0116CV
RETURN DATE: 03/03/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,

-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on 02/10/2022, 12:39PM at STATE CAPITOL BUILDING, ROOM 246, ALBANY, NEW YORK 12224, deponent served a [PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION TO LEAVE TO AMEND, AND SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION upon LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with PHIL GILTNER, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex M Approximate age 55 Approximate height 6'00" Approximate weight 160 Color of skin WHITE Color of hair BALD

Sworn to before me on 02/11/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



X 
STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:10 AM

NYSCEF DOC. NO. 63

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

FILED: STEUBEN COUNTY CLERK 02/09/2022 04:12 PM

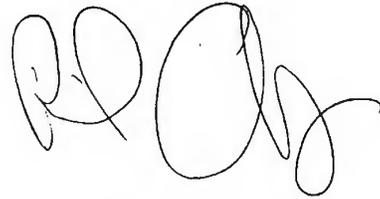
NYSCEF DOC. NO. 24

RECEIVED NYSCEF: 02/09/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 9th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.



SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

PHIL GILTNER

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ORDER TO SHOW CAUSE
FOR LEAVE TO FILE
AMENDED PETITION**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:12 AM
~~AFFIDAVIT OF SERVICE~~

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 64
INDEX #: E2022-0116CV
RETURN DATE: 03/03/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on 02/10/2022, 12:32PM at STATE CAPITOL BUILDING, ROOM #321, ALBANY, NY 12224, deponent served a [PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION TO LEAVE TO AMEND, AND SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION upon SENATE MAJORITY LEADER AND PRESIDENT PRO TEMPORE OF THE SENATE ANDREA STEWART-COUSINS, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with JELLISA JOSEPH, ESQ./COUNSEL TO THE SECRETARY OF THE SENATE, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex F Approximate age 36 Approximate height 5'08" Approximate weight 140 Color of skin BLACK Color of hair BLACK

Sworn to before me on 02/11/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



X 
_____ STEF MARIE

SERVING BY IRVING INC.
18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:12 AM

NYSCEF DOC. NO. 64

FILED: STEUBEN COUNTY CLERK 02/09/2022 04:12 PM

NYSCEF DOC. NO. 24

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/09/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 9th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ORDER TO SHOW CAUSE
FOR LEAVE TO FILE
AMENDED PETITION**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

2/10/22
12:32p
[Handwritten signature]

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:13 AM
~~AFFIDAVIT OF SERVICE~~

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 65
INDEX #: E2022-0116CV
RETURN DATE: 03/03/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on **02/10/2022, 12:20PM** at **STATE CAPITOL BUILDING, ROOM #448M, ALBANY, NEW YORK 12224**, deponent served a **[PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION TO LEAVE TO AMEND, AND SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION** upon **SPEAKER OF THE ASSEMBLY CARL HEASTIE**, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with **BRIAN R. HAAK, ESQ.**, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex **M** Approximate age **60** Approximate height **5'09"** Approximate weight **170** Color of skin **WHITE** Color of hair **BALDING GRAY**

Sworn to before me on 02/11/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026




_____ STEF MARIE

SERVING BY IRVING INC.
18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:13 AM

NYSCEF DOC. NO. 65

FILED: STEUBEN COUNTY CLERK 02/09/2022 04:12 PM

NYSCEF DOC. NO. 24

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/09/2022

FOR
2/10/2022
12:20 pm

At IAS Part ___ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 9th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X
TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ORDER TO SHOW CAUSE
FOR LEAVE TO FILE
AMENDED PETITION**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, et al.

INDEX NUMBER: E2022-0116CV

vs

Plaintiff

GOVERNOR KATHY HOCHUL, et al.

Defendant

AFFIDAVIT OF SERVICE

State of New York }
County of New York } ss.:

The undersigned, being duly sworn, deposes and says;

Deponent is not a party herein, is over 18 years of age and resides in Rye Brook, New York

That on 2/14/2022 at 10:28 AM at 1446 E Gun Hill Rd., Bronx, NY 10469

deponent served a(n) Order to Show Cause for Leave to File Amended Petition, [Proposed] Order to Show Cause for Leave to File Amended Petition, Affirmation in Support of of Petitioners' Order to Show Cause with Exhibits A-G, Memorandum of Law in Support of Motion for Leave to Amend

on Carl Heastie

by delivering thereat a true copy of each to Michelle "Doe" (Refused to Give Last Name) [Co-Worker], a person of suitable age and discretion. Said premises is defendant's actual place of business within the state.

Within 20 days of such delivery, deponent mailed a copy of same by first class mail in a postpaid envelope properly addressed to defendant at defendant's actual place of business at 1446 E Gun Hill Rd., Bronx, NY 10469. The envelope bore the legend "Personal and Confidential" and did not indicate on the outside thereof, by return address or otherwise, that the communication was from an attorney or concerned an action against the defendant.

Mailed Copy on 02/15/2022

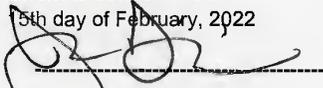
c/o New York State Assembly Member Carl E Heastie

Description of Person Served:

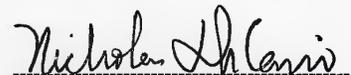
Gender: Female
Skin: Black
Hair: Brown
Age: 22 - 35 Yrs.
Height: 5' 4" - 5' 8"
Weight: 100-130 Lbs.
Other:

MILITARY SERVICE: Upon information and belief based upon the conversation(s) and observation(s) as aforesaid deponent avers that the defendant is not in the military service of the State of New York or the United States as that term is defined in the statutes of the State of New York or the Federal Soldiers and Sailors Civil Relief Act.

Sworn to before me this
15th day of February, 2022



NOTARY PUBLIC
JOHN DICANIO
NOTARY PUBLIC STATE OF NEW YORK
WESTCHESTER COUNTY
LIC. # 01D1497768
COMM EXP. 2/11/2023



Nicholas DiCanio
License No. 1422308

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:15 AM

NYSCEF DOC. NO. 66

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, et al.

INDEX NUMBER: E2022-0116CV

vs

Plaintiff

GOVERNOR KATHY HOCHUL, et al.

Defendant

AFFIDAVIT OF SERVICE

State of New York }
County of New York } ss.:

The undersigned, being duly sworn, deposes and says;

Deponent is not a party herein, is over 18 years of age and resides in New York, New York

That on 2/10/2022 at 1:45 PM at 28 Liberty Street, 16th fl., New York, NY 10005

deponent served a(n) Order to Show Cause for Leave to File Amended Petition, [Proposed] Order to Show Cause for Leave to File Amended Petition, Affirmation in Support of of Petitioners' Order to Show Cause with Exhibits A-G, Memorandum of Law in Support of Motion for Leave to Amend

on New York State Office of the Attorney General, ATTN: Managing Attorney's Office/Personal Service, a domestic corporation,

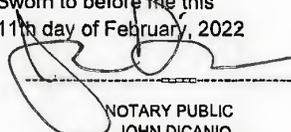
by delivering thereat a true copy of each to Lynette Stone personally,

deponent knew said corporation so served to be the corporation described in said documents as said defendant and knew said individual to be authorized to accept service thereof.

Description of Person Served:

Gender : Female
Skin : Black
Hair : Black
Age : 51 - 65 Yrs.
Height : 5' 4" - 5' 8"
Weight : Over 200 Lbs.
Other : Glasses

Sworn to before me this
11th day of February, 2022



NOTARY PUBLIC
JOHN DICANIO
NOTARY PUBLIC STATE OF NEW YORK
WESTCHESTER COUNTY
LIC. # 01DI4977768
COMM EXP. 2/11/2023


Juan Pimentel
License No.2066974

Serving By Irving, Inc. | 18 East 41st Street, Suite 1600 | New York, NY 10017
New York City Dept. of Consumer Affairs License No. 0781160

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:15 AM

NYSCEF DOC. NO. 66

FILED: STEUBEN COUNTY CLERK 02/09/2022 04:12 PM

NYSCEF DOC. NO. 24

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022
INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/09/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 9th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ORDER TO SHOW CAUSE
FOR LEAVE TO FILE
AMENDED PETITION**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

2022 FEB 10 PM 1:46

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:16 AM

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

~~AFFIDAVIT OF SERVICE~~
NYSCEF DOC. NO. 67
INDEX #: E2022-0116CV
RETURN DATE: 03/03/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on 02/10/2022, 01:04PM at 40 NORTH PEARL STREET, SUITE 5, ALBANY, NY 12207, deponent served a [PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION TO LEAVE TO AMEND, AND SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION upon NEW YORK STATE BOARD OF ELECTIONS, a respondent in the above captioned matter.

By delivering to and leaving with JESSICA NOGROVE at the above address and that deponent knew the person so served to be the agent duly authorized to accept service of process on behalf of the NEW YORK STATE BOARD OF ELECTIONS.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex F Approximate age 43 Approximate height 5'05" Approximate weight 135 Color of skin WHITE Color of hair BLONDE

Sworn to before me on 02/11/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026

David Post

X Stef Marie
STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:16 AM

NYSCEF DOC. NO. 67

FILED: STEUBEN COUNTY CLERK 02/09/2022 04:12 PM

NYSCEF DOC. NO. 24

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/09/2022

At IAS Part __ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the 9th day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ORDER TO SHOW CAUSE
FOR LEAVE TO FILE
AMENDED PETITION**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

RECEIVED - NYSCEF
02/17/2022 10:16 AM

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:18 AM
~~AFFIDAVIT OF SERVICE~~

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/17/2022

NYSCEF DOC. NO. 68
INDEX #: **E2022-0116CV**
RETURN DATE: **03/03/2022 @ 9:30AM**
ATTORNEY: **TROUTMAN PEPPER HAMILTON SANDERS LLP**
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on **02/10/2022, 11:54AM** at **198 STATE STREET, LOBBY, ALBANY, NY 12210**, deponent served a **[PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION TO LEAVE TO AMEND, AND SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION** upon **THE NEW YORK STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND REAPPORTIONMENT**, a respondent in the above captioned matter.

By delivering to and leaving with **DANIELLE KAMINSKI** at the above address and that deponent knew the person so served to be the agent duly authorized to accept service of process on behalf of the **THE NEW YORK STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND REAPPORTIONMENT**.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:

Sex **F** Approximate age **29** Approximate height **5'04"** Approximate weight **130** Color of skin **WHITE** Color of hair **BROWN**

Sworn to before me on 02/11/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



X 
_____ STEF MARIE

SERVING BY IRVING INC.

18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

FILED: STEUBEN COUNTY CLERK 02/17/2022 10:18 AM

NYSCEF DOC. NO. 68

FILED: STEUBEN COUNTY CLERK 02/07/2022 09:19 AM

NYSCEF DOC. NO. 11

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/17/2022

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/07/2022

At IAS Part ___ of the Supreme Court of the State of New York, held in and for the County of Steuben, at the Courthouse located at 3 East Pulteney Square Bath, NY 14810, on the ___ day of February, 2022.

PRESENT: _____

HON. PATRICK F. McALLISTER, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X
TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E-2022-0116CV

ORDER TO SHOW CAUSE

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X
*Danielle
Kamurski*

798

COURT NOTICE, DATED FEBRUARY 18, 2022

FILED: STEUBEN COUNTY CLERK 02/18/2022 11:07 AM

NYSCEF DOC. NO. 69

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/18/2022

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN
JUDGE MCALLISTER, PATRICK F**



TIM HARKENRIDER et al

- v. -

GOVERNOR KATHY HOCHUL et al

Index No. E2022-0116CV

COURT NOTICE

Filing on Behalf of - Hon. Patrick F. McAllister

The appearances scheduled on March 3, 2022 for this matter will be IN PERSON.

DATED 02/18/2022

FILED By Brenda Wise

LETTER FROM BENNET J. MOSKOWITZ, ESQ. AND MISHA TSEYTLIN TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 24, 2022

Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com



Bennet J. Moskowitz
bennet.moskowitz@troutman.com

February 24, 2022

VIA NYSCEF

Honorable Patrick F. McAllister
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider, et al. v. Hochul, et al.*, Index No. E2022-0116CV (Sup. Ct. Steuben Cnty.)

Dear Justice McAllister:

We represent Petitioners in the above-referenced CPLR Article 4 special proceeding and write to inquire about Your Honor's preferences for the March 3, 2022 hearing on the Petition and Petitioners' motions for leave to amend the Petition and leave to pursue expedited discovery. In particular, Petitioners hereby seek clarity on whether the Court prefers to hear in-person testimony of expert witnesses at the hearing. If so, Petitioners will make arrangements for their expert witnesses to attend the March 3 hearing in person, consistent with Your Honor's direction to the parties.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bennet J. Moskowitz".

Bennet J. Moskowitz

A handwritten signature in blue ink, appearing to read "Misha Tseytlin".

Misha Tseytlin

cc: All Counsel Of Record (via NYSCEF and email)

ANSWER AND COUNTERSTATEMENT OF RESPONDENTS SENATE MAJORITY LEADER AND PRESIDENT PRO TEMPORE OF THE SENATE ANDREA STEWART-COUSINS AND THE NEW YORK STATE SENATE MAJORITY'S APPOINTEES TO THE NEW YORK STATE LEGISLATIVE TASK FORCE ON DEMOGRAPHIC RESEARCH AND REAPPORTIONMENT, DATED FEBRUARY 24, 2022 [800 - 844]

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:19 PM
NYSCEF DOC. NO. 71

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/24/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X
TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND MARIANNE
VOLANTE,

Index No. E2022-0116CV

**ANSWER AND
COUNTERSTATEMENT**

Petitioners,

-against-

GOVERNOR KATHY HOCUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

Respondents Senate Majority Leader and President *Pro Tempore* of the Senate Andrea Stewart-Cousins and the New York State Senate Majority's appointees to the New York State Legislative Task Force on Demographic Research and Reapportionment ("LATFOR"), by and through their attorneys, Cuti Hecker Wang LLP, as and for their Answer and Counterstatement to the Petition, allege as follows:

1. Deny the allegations set forth in paragraph 1.
2. Deny the allegations set forth in paragraph 2, except admit that article III, sections 4 and 5 of the New York Constitution were amended to create the New York State Independent Redistricting Commission (the "Commission") to participate in the redistricting process.

3. Deny the allegations set forth in paragraph 3. Any submissions made in prior lawsuits speak for themselves.
4. Deny the allegations set forth in paragraph 4.
5. Deny the allegations set forth in paragraph 5, except admit that a constitutional amendment related to the redistricting process was not approved by voters in the November 2021 election.
6. Deny the allegations set forth in paragraph 6.
7. Paragraph 7 calls for a conclusion of law as to which no response is required.
8. Deny the allegations set forth in paragraph 8.
9. Deny the allegations set forth in paragraph 9.
10. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 10.
11. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 11.
12. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 12.
13. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 13.
14. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 14.
15. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 15.

16. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 16.

17. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 17.

18. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 18.

19. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 19.

20. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 20.

21. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 21.

22. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 22.

23. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 23.

24. Admit the allegations set forth in paragraph 24.

25. Admit the allegations set forth in paragraph 25.

26. Admit the allegations set forth in paragraph 26.

27. Admit the allegations set forth in paragraph 27.

28. Admit the allegations set forth in paragraph 28.

29. Admit the allegations set forth in paragraph 29 concerning LATFOR's principal place of business. Paragraph 29 otherwise calls for a conclusion of law as to which no response is required.

30. Paragraph 30 calls for conclusions of law as to which no response is required.

31. Paragraph 31 calls for conclusions of law as to which no response is required.

32. Admit the allegations in paragraph 32.

33. Paragraph 33 calls for conclusions of law as to which no response is required.

34. Deny the allegations set forth in paragraph 34, except admit that the schedule and deadlines for elections in New York are governed by N.Y. Election Law, sections 6-100 *et seq.*, and respectfully refer to those statutes for their terms.

35. Deny the allegations set forth in paragraph 35 to the extent the allegations suggest that the Legislature is no longer primarily responsible for redistricting. Admit that the New York Legislature was, and remains, primarily responsible for enacting redistricting legislation.

36. Admit that LATFOR worked with the Legislature to prepare redistricting maps as alleged in paragraph 36.

37. Deny the allegations set forth in paragraph 37, except admit that LATFOR was established in 1978 and consists of six members, four of whom are legislators and two of whom are non-legislators, and that LATFOR's members are appointed as alleged.

38. Deny the allegations set forth in paragraph 38.

39. Deny the allegations set forth in paragraph 39.

40. Deny the allegations set forth in paragraph 40, except admit that the New York Constitution and federal law require consideration of multiple factors in the redistricting process.

41. Paragraph 41 calls for a conclusion of law as to which no response is required.

42. Deny the allegations set forth in paragraph 42.
43. Deny the allegations set forth in paragraph 43.
44. Admit the allegations set forth in paragraph 44.
45. Deny the allegations set forth in paragraph 45.
46. Deny the allegations set forth in paragraph 46, except admit that the commissioners of the Commission are appointed as set forth in this paragraph.
47. Paragraph 47 calls for conclusions of law as to which no response is required.
48. Deny that “[f]ive members of the IRC constitute a quorum.” Article II, section 5-b(f) of the New York Constitution provides that, after the final two commissioners have been appointed by the other Commission members, a minimum of seven commissioners is required to form a quorum. Paragraph 48 otherwise calls for conclusions of law as to which no response is required.
49. Paragraph 49 calls for conclusions of law as to which no response is required.
50. Paragraph 50 calls for conclusions of law as to which no response is required.
51. Deny the allegations set forth in paragraph 51.
52. Paragraph 52 calls for conclusions of law as to which no response is required.
53. Deny the allegations set forth in paragraph 53, except admit that article III of the New York Constitution requires that the Legislature consider certain factors in the redistricting process.
54. Deny the allegations set forth in paragraph 54 to the extent that facts are alleged therein. Paragraph 54 otherwise calls for conclusions of law as to which no response is required.
55. Deny the allegations set forth in paragraph 55.

56. Deny the allegations set forth in paragraph 56, except admit that a ballot proposal submitted to voters in November 2021 contained multiple provisions, including the provision set forth in paragraph 56.

57. Deny the allegations set forth in paragraph 57, except admit that the Legislature enacted and the Governor signed into law an amendment to chapter 17 of the laws of 2012 pertaining to the redistricting process, and respectfully refer to the legislation for its terms.

58. Deny the allegations set forth in paragraph 58.

59. Respondents respectfully refer to the article and judicial decision referenced for their contents.

60. Deny the allegations set forth in paragraph 60.

61. Admit that between 2010 and 2020 the population within New York's congressional districts changed. Paragraph 61 otherwise calls for conclusions of law as to which no response is required.

62. Admit the allegations set forth in paragraph 62.

63. Admit that the 2012 congressional map does not comply with the current population target for congressional districts. Paragraph 63 otherwise calls for a conclusion of law as to which no response is required.

64. Paragraph 64 calls for a conclusion of law as to which no response is required.

65. Admit the allegations set forth in paragraph 65.

66. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 66, except admit that the current population of Congressional District 23, as drawn following the 2010 decennial census, has 83,462 residents fewer than the population goal, which represents a -10.7% deviation.

67. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 67, except admit that the current population of Congressional District 22, as drawn following the 2010 decennial census, has 80,361 fewer residents than the population goal, which represents a -10.3% deviation.

68. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 68, except admit that the population of Congressional District 19, as drawn following the 2010 decennial census, has 78,298 fewer residents than the population goal, which represents a -10.1% deviation.

69. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 69, except admit that the population of Congressional District 24, as drawn following the 2010 decennial census, has 59,664 fewer residents than the population goal, which represents a -7.7% deviation.

70. Admit that New York received 27 congressional seats after the 2010 census and 26 congressional seats after the 2020 census. Paragraph 70 otherwise calls for a conclusion of law as to which no response is required.

71. Admit the allegations set forth in paragraph 71.

72. Paragraph 72 calls for a conclusion of law as to which no response is required.

73. Deny the allegations set forth in paragraph 73.

74. Admit the allegations set forth in paragraph 74.

75. Deny the factual allegations set forth in paragraph 75, except admit that the listed individuals are commissioners of the Commission. Paragraph 75 otherwise calls for a conclusion of law as to which no response is required.

76. Deny the factual allegations set forth in paragraph 76, except admit that the listed individuals are commissioners of the Commission. Paragraph 76 otherwise calls for a conclusion of law as to which no response is required.

77. Deny the allegations set forth in paragraph 77.

78. Deny the allegations set forth in paragraph 78, except admit that the Legislature timely allocated \$1 million to the Commission in the 2020 budget and \$4 million to the Commission in the 2021 budget. Any delays in the Commission receiving these appropriated funds were not caused by the Legislature.

79. Deny the allegations set forth in paragraph 79. The Commission began a series of hearings to solicit public testimony about the redistricting process on July 20, 2021.

80. Admit the allegations set forth in paragraph 80.

81. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 81.

82. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 82, except admit that Commission Chair Imamura publicly stated that he did not see the Commission's decision to publish separate maps on September 15, 2021 as indicating an inability to reach agreement later.

83. Deny the allegations set forth in paragraph 83, except admit that the Commission held a total of 24 public hearings to solicit input regarding the redistricting process and also solicited written input from the public regarding the redistricting process.

84. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 84.

85. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 85.

86. Deny the allegations set forth in paragraph 86, except admit that following the public comment period, the Commission scheduled meetings to negotiate and finalize a single set of maps to submit to the Legislature.

87. Deny the allegations set forth in paragraph 87.

88. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 88.

89. Deny the allegations set forth in paragraph 89.

90. Admit the allegations set forth in paragraph 90.

91. Deny the allegations set forth in paragraph 91.

92. Deny the allegations set forth in paragraph 92, except admit that the Commission voted on two redistricting plans on January 3, 2022.

93. Admit the allegations set forth in paragraph 93.

94. Deny the allegations set forth in paragraph 94.

95. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 95.

96. Admit that Commission Plan A and Commission Plan B each received the number of votes set forth in paragraph 96. The statements of individual Senators during the legislative debate speak for themselves. Deny the truth of the statement allegedly made by Senator Andrew Lanza.

97. Admit the allegations set forth in paragraph 97.

98. Paragraph 98 calls for a conclusion of law as to which no response is required.

99. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 99, except deny that Democratic members of the Commission refused to meet or discuss bipartisan maps.

100. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 100.

101. Admit the allegations set forth in paragraph 101.

102. Deny the allegations set forth in paragraph 102, except admit that Commissioner Martins issued a statement on January 24, 2021.

103. Deny the factual allegations set forth in paragraph 103, except admit that the Commission did not submit a second redistricting plan or plans to the Legislature for a vote as set forth in paragraph 103. Paragraph 103 otherwise calls for a conclusion of law as to which no response is required.

104. Deny the allegations set forth in paragraph 104.

105. Deny the allegations set forth in paragraph 105.

106. Deny the allegations set forth in paragraph 106.

107. Deny the allegations set forth in paragraph 107, except admit that the Legislature released its congressional redistricting map on January 30, 2022, and that the Legislature voted on the map without conducting additional public hearings due to approaching election deadlines.

108. Deny the allegations set forth in paragraph 108.

109. Deny the allegations set forth in paragraph 109.

110. Deny the allegations set forth in paragraph 110.

111. Deny the allegations set forth in paragraph 111.

112. Deny the allegations set forth in paragraph 112. The cited *New York Daily News* article speaks for itself with regard to any quotes contained therein.

113. Deny the allegations set forth in paragraph 113.

114. Deny the allegations set forth in paragraph 114.

115. Deny the allegations set forth in paragraph 115.

116. Deny the allegations set forth in paragraph 116.

117. Deny the allegations set forth in paragraph 117.

118. Deny the allegations set forth in paragraph 118.

119. Deny the allegations set forth in paragraph 119.

120. Deny the allegations set forth in paragraph 120.

121. Deny the allegations set forth in paragraph 121.

122. Deny the allegations set forth in paragraph 122.

123. Deny the allegations set forth in paragraph 123.

124. Deny the allegations set forth in paragraph 124.

125. Deny the allegations set forth in paragraph 125.

126. Deny the allegations set forth in paragraph 126.

127. Deny the allegations set forth in paragraph 127.

128. Deny the allegations set forth in paragraph 128.

129. Deny the allegations set forth in paragraph 129, except deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegation that Assemblymember Marcela Mitaynes made the quoted statement during legislative debate in the Assembly.

130. Deny the allegations set forth in paragraph 130.

131. Deny the allegations set forth in paragraph 131.
132. Deny the allegations set forth in paragraph 132.
133. Deny the allegations set forth in paragraph 133.
134. Deny the allegations set forth in paragraph 134.
135. Deny the allegations set forth in paragraph 135.
136. Deny the allegations set forth in paragraph 136.
137. Deny the allegations set forth in paragraph 137.
138. Deny the allegations set forth in paragraph 138.
139. Deny the allegations set forth in paragraph 139.
140. Deny the allegations set forth in paragraph 140.
141. Deny the allegations set forth in paragraph 141.
142. Deny the allegations set forth in paragraph 142, except admit that Congressional District 17 was previously located in Rockland and Westchester counties.
143. Deny the allegations set forth in paragraph 143, except admit that District 17 was adjusted to include parts of Sullivan, Orange, Rockland and Westchester counties.
144. Deny the allegations set forth in paragraph 144, except admit that District 17 includes part of White Plains.
145. Deny the allegations set forth in paragraph 145, except admit that District 17 unites communities of interest.
146. Deny the allegations set forth in paragraph 146.
147. Deny the allegations set forth in paragraph 147.
148. Deny the allegations set forth in paragraph 148.
149. Deny the allegations set forth in paragraph 149.

150. Deny the allegations set forth in paragraph 150.
151. Deny the allegations set forth in paragraph 151, except admit that Binghamton is located in Congressional District 19.
152. Deny the allegations set forth in paragraph 152, except admit that Utica is located in Congressional District 19.
153. Deny the allegations set forth in paragraph 153.
154. Deny the allegations set forth in paragraph 154.
155. Deny the allegations set forth in paragraph 155.
156. Deny the allegations set forth in paragraph 156.
157. Deny the allegations set forth in paragraph 157.
158. Deny the allegations set forth in paragraph 158.
159. Deny the allegations set forth in paragraph 159, except admit that Congressional District 23 includes suburbs of the city of Buffalo.
160. Deny the allegations set forth in paragraph 160.
161. Deny the allegations set forth in paragraph 161.
162. Deny the allegations set forth in paragraph 162, except admit that Congressional District 24 previously included Wayne, Cayuga, and Onondaga Counties, as well as part of Oswego County.
163. Deny the allegations set forth in paragraph 163, except admit that Congressional District 24 includes Lewiston, part of Erie County, and part of Jefferson County.
164. Deny the allegations set forth in paragraph 164.
165. Deny the allegations set forth in paragraph 165.
166. Deny the allegations set forth in paragraph 166.

167. Deny the allegations set forth in paragraph 167, except admit that the Legislature voted to approve the congressional map on February 2, 2022.

168. Deny the allegations set forth in paragraph 168, except admit that Republican legislators and Assemblymembers Simcha Eichenstein and Marcela Mitaynes voted against the congressional map.

169. Deny the allegations set forth in paragraph 169.

170. Deny the allegations set forth in paragraph 170. To the extent that paragraph 170 purports to quote from news articles or comments on the Commission's website, such articles or comments speak for themselves.

171. Deny the allegations set forth in paragraph 171. To the extent that paragraph 171 purports to quote from news articles, such articles speak for themselves.

172. Deny the allegations set forth in paragraph 172. To the extent that paragraph 172 purports to quote from news articles, such articles speak for themselves.

173. Deny the allegations set forth in paragraph 173, except admit that Governor Hochul signed the congressional redistricting plan into law on February 3, 2022.

174. Deny the allegations set forth in paragraph 174, except deny knowledge or information sufficient to form a belief as to what Petitioners want as set forth in paragraph 174.

175. Deny the allegations set forth in paragraph 175.

176. Deny the allegations set forth in paragraph 176.

177. Admit that voters should choose their elected representatives as set forth in paragraph 177.

178. Deny the allegations set forth in paragraph 178.

179. Deny the allegations set forth in paragraph 179.

180. Deny the allegations set forth in paragraph 180.

181. Deny the allegations set forth in paragraph 181, except deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations regarding where certain Petitioners reside.

182. Deny the allegations set forth in paragraph 182, except deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations regarding where certain Petitioners reside.

183. Deny the allegations set forth in paragraph 183, except deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations regarding where certain Petitioners reside.

184. Deny the allegations set forth in paragraph 184, except deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations regarding where certain Petitioners reside.

185. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph 185.

186. Respondents repeat and incorporate their responses to paragraphs 1-185.

187. Paragraph 187 calls for a conclusion of law as to which no response is required.

188. Paragraph 188 calls for a conclusion of law as to which no response is required.

189. Paragraph 189 calls for a conclusion of law as to which no response is required.

190. Deny the allegations set forth in paragraph 190.

191. Deny the allegations set forth in paragraph 191, except admit that the Commission did not send a second proposed plan or plans for a vote by the Legislature within fifteen days of the Legislature's rejection of the first proposed plans.

192. Deny the allegations set forth in paragraph 192.
193. Deny the allegations set forth in paragraph 193.
194. Deny the allegations set forth in paragraph 194.
195. Deny the allegations set forth in paragraph 195.
196. Deny the allegations set forth in paragraph 196, except to the extent that paragraph 196 calls for a conclusion of law as to which no response is required.
197. Deny the allegations set forth in paragraph 197, except to the extent that paragraph 197 calls for a conclusion of law as to which no response is required.
198. Respondents repeat and incorporate their responses to paragraphs 1-197.
199. Paragraph 199 calls for a conclusion of law as to which no response is required.
200. Paragraph 200 calls for a conclusion of law as to which no response is required.
201. Paragraph 201 calls for a conclusion of law as to which no response is required.
202. Deny the allegations set forth in paragraph 202, except to the extent that paragraph 202 calls for a conclusion of law as to which no response is required.
203. Deny the allegations set forth in paragraph 203, except to the extent that paragraph 203 calls for conclusions of law as to which no response is required.
204. Paragraph 204 calls for conclusions of law as to which no response is required.
205. Paragraph 205 calls for a conclusion of law as to which no response is required.
206. Paragraph 206 calls for a conclusion of law as to which no response is required.
207. Paragraph 207 calls for conclusions of law as to which no response is required.
208. Respondents repeat and incorporate their responses to paragraphs 1-207.
209. Paragraph 209 calls for a conclusion of law as to which no response is required.
210. Paragraph 210 calls for a conclusion of law as to which no response is required.

211. Paragraph 211 calls for a conclusion of law as to which no response is required.
212. Paragraph 212 calls for a conclusion of law as to which no response is required.
213. Deny the allegations set forth in paragraph 213.
214. Deny knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in paragraph 214, and respectfully refer to the document referenced for its contents.
215. Deny the allegations set forth in paragraph 215, except to the extent that paragraph 215 calls for conclusions of law as to which no response is required.
216. Respondents repeat and incorporate their responses to paragraphs 1-215.
217. Paragraph 217 calls for a conclusion of law as to which no response is required.
218. Admit the allegations set forth in paragraph 218.
219. Paragraph 219 calls for conclusions of law as to which no response is required.
220. Deny the allegations set forth in paragraph 220.
221. Deny the allegations set forth in paragraph 221, except to the extent that paragraph 221 calls for conclusions of law as to which no response is required.
222. Deny the allegations set forth in paragraph 222.
223. Paragraph 223 calls for a conclusion of law as to which no response is required.
224. Deny the allegations set forth in paragraph 224.
225. Deny the allegations set forth in paragraph 225.
226. Paragraph 226 calls for conclusions of law as to which no response is required.

COUNTERSTATEMENT OF FACTS***Changes in the Population of New York State Since the 2010 Census, Which Varied Across Regions, Together with a Decrease in the Size of New York's Congressional Delegation, Necessitated Significant Changes to the Congressional Map***

227. Every ten years, New York must reapportion its congressional districts to account for population changes documented in the decennial census.

228. Federal law requires that there be zero population deviation across every congressional district. Accordingly, the population in each congressional district can vary by no more than one resident.

229. The 2010 decennial census reported that New York had 19,378,102 residents.

230. The 2020 decennial census reported that New York has 20,201,249 residents.

231. The 2022 reapportionment of congressional districts therefore required accommodating a statewide population increase of 823,147 people.

232. Based on the nationwide results of the 2020 decennial census, the New York congressional delegation was reduced from 27 districts to 26 districts.

233. Each of the 27 congressional districts in the 2012 congressional redistricting plan had to contain within one voter of 717,707 New York residents.

234. Each of the 26 congressional districts in the 2022 congressional redistricting plan must contain 776,971 residents, with a margin of one resident.

235. Because each existing congressional district had to gain, on average, tens of thousands of people, the congressional map had to change significantly within and between districts.

236. Moreover, the increase in population that New York experienced between 2010 and 2020 was not evenly distributed throughout New York State.

237. The downstate areas of New York – including New York City and Long Island – experienced significant population growth during the last decade.

238. The total population of the five counties within New York City increased by 629,057 people from 2010 to 2020, from 8,175,133 to 8,804,190. This represented a 7.7% increase in total population.

239. When New York City is combined with Nassau, Suffolk, and Westchester Counties – together, the eight southernmost counties in New York State – the total population of the downstate region increased by 773,213 from 2010 to 2020, from 11,957,128 to 12,730,341. This represented a 6.5% increase in the total population of the downstate region.

240. Because the target congressional district size for New York under the 2020 census is 776,971 people, the population growth that the downstate region experienced between 2010 and 2020 constituted nearly an entire additional congressional district.

241. New York's upstate region covers a significantly larger area geographically than downstate, but its population is highly dispersed.

242. All of New York's counties with fewer than 200,000 people are located in the Hudson Valley or upstate regions.

243. Of the 62 counties in New York, 44 counties have a population of less than 200,000 people.

244. These 44 counties presently contain a total population of 3,250,015. That reflects a population decrease of 83,403 people since the 2010 census.

245. Not counting Richmond County, which is part of New York City, eight counties in New York have a population of between 200,000 and 500,000 people.

246. Those eight counties increased in population by only 83,042 between 2010 and 2020.

247. Thus, among the 52 least populous counties in New York outside of New York City, there was almost no change in total population between 2010 and 2020.

248. The two counties in New York with a population between 500,000 and 1,000,000 – Erie County and Monroe County – gained a total of 50,295 people between 2010 and 2020.

249. Given these statistics, nearly all of New York’s population gain during the last decade is attributable to a small percentage of its counties, and nearly all of the population gain is attributable to the eight counties comprising the downstate region.

250. New York’s registered Democrats are concentrated most heavily in New York City and its suburbs and in other urban centers throughout the State. These are the areas that experienced the greatest population gains over the last ten years.

251. New York’s registered Republicans are concentrated most heavily in the upstate region and in rural areas throughout the State that lost population over the last ten years.

252. These population shifts significantly constrain the range of choices available with respect to a new congressional plan.

253. These population shifts have partisan consequences that arise from the fact that Republican-dominated counties lost substantial population relative to Democrat-dominated counties.

254. The reapportionment process is also affected by New York’s unique geography.

255. New York City and Long Island together comprise approximately 58% of the State’s total population and have experienced most of the State’s population growth since 2010.

256. The physical narrowing of the land where Bronx County connects to Westchester County creates a bottleneck through which districts must expand to the north to accommodate population growth in New York City and Long Island to account for population loss in the upstate region.

257. As discussed below, this physical bottleneck, the strict population equality requirement, and the requirement that minority voting strength not be diluted all significantly constrain the range of choices available with respect to a new congressional plan.

Federal Law and the New York Constitution Require Numerous Disparate and Often Competing Factors to Be Balanced When Reapportioning Legislative Districts

258. Because of the requirements expressly enumerated in the New York Constitution and the judicial precedents interpreting various federal and state constitutional and statutory requirements for redistricting, the task of reapportioning New York's congressional districts requires adhering to and balancing numerous often competing principles.

259. Federal law and the New York Constitution both require the protection of minority voting rights.

260. Section 2 of the Voting Rights Act prohibits voting practices or procedures that discriminate on the basis of race, color, or language minority. 52 U.S.C. § 10301.

261. Article III, section 4 of the Constitution provides that those drawing district lines “shall consider whether such lines would result in the denial or abridgement of racial or language minority voting rights, and districts shall not be drawn to have the purpose of, nor shall they result in, the denial or abridgement of such rights.”

262. Article III, section 4 further provides that “[d]istricts shall be drawn so that, based on the totality of the circumstances, racial or minority language groups do not have less

opportunity to participate in the political process than other members of the electorate and to elect representatives of their choice.”

263. Article III, section 4 of the New York Constitution also imposes additional requirements.

264. Article III, section 4(c)(3) requires that each district must “consist of contiguous territory.”

265. Article III, section 4(c)(4) requires that each district must “be as compact in form as practicable.”

266. Article III, section 4(c)(5) requires that “[d]istricts shall not be drawn to discourage competition or for the purpose of favoring or disfavoring incumbents or other particular candidates or political parties.”

267. Article III, section 4(c)(5) requires the consideration of “the maintenance of cores of existing districts.”

268. Article III, section 4(c)(5) requires the consideration of “pre-existing political subdivisions, including counties, cities, and towns.”

269. Article III, section 4(c)(5) further requires the consideration of “communities of interest.”

270. Any fair evaluation of a reapportionment plan must recognize the complexity of balancing these disparate constitutional and statutory factors and applying them to the realities of New York’s population size, the distribution of its population, and its unique geography.

271. Petitioners present an array of criticisms of particular districts in the enacted congressional plan, but their criticisms disregard the interconnections between and among districts and regions that naturally constrain the range of available choices – including, for

example, the basic fact that substantially increasing the population of one district, which the new census data requires for nearly all previously existing districts, necessarily affects the areas that are available to include in surrounding districts.

272. Petitioners' criticisms of particular districts in the enacted congressional plan are frequently internally inconsistent and/or inconsistent across districts.

273. Petitioners' claim that the enacted congressional reapportionment plan is unconstitutionally partisan is false.

274. As detailed below, many of Petitioners' factual allegations are simply false; others ignore how the reapportionment process works, the full range of factors the Legislature was required to consider, and the neutral principles that support the creation of each enacted district; and still others are premised upon self-serving and undefined metrics that inaccurately characterize the political effects of the enacted congressional plan.

275. A proper assessment of the enacted congressional plan confirms that it is not unlawful in whole or in part.

Districts 1, 2, and 3 in Long Island, Queens, the Bronx, and Westchester Are Not Unlawful

276. A fair assessment of the congressional districts in Long Island and Westchester requires that Districts 1, 2, and 3 be considered together.

277. The federal equal population rule required the population of former District 1 to be increased by 36,652 people.

278. The federal equal population rule required the population of former District 2 to be increased by 48,815 people.

279. The federal equal population rule required the population of former District 3 to be increased by 37,774 people.

280. District 1 in the enacted congressional plan preserves the core of the prior district. 56% of the old District 1 is in the new District 1.

281. District 2 unites communities of interest along the South Shore of Long Island that previously had been separated, including areas along the southern bays and barrier islands that experience similar environmental issues. The district unites significant parts of the Town of Islip and the Town of Babylon and unites those populations with similar South Shore communities in the Town of Brookhaven.

282. District 1 unites communities of interest along the North Shore of Long Island.

283. District 1 maintains a connection between communities of interest in Babylon and Islip, which had been united under the previous map.

284. District 1 continues to unite growing populations of Central American immigrants in Flanders, Riverside, and Riverhead with similar communities in Babylon and Islip. These communities share a common language and share common interests and needs.

285. District 1 reflects public testimony before the Commission that advocated for a congressional district that continues to unite Brookhaven National Laboratory with SUNY Stony Brook, two major research centers in Suffolk County of national significance.

286. Petitioners allege falsely that the reapportionment “effectively flipped” District 1 from a “strong Republican district” to “a lean Democratic district.”

287. Former District 1 was not a “strong Republican district.” It was and remains a highly competitive district.

288. During the first congressional election in District 1 after the 2012 redistricting, a Democrat was elected.

289. Petitioners also criticize the reapportionment of District 3, but in doing so, they ignore the redistricting requirements and principles that had to be applied and balanced in devising the congressional plan as a whole.

290. District 3 is now shaped differently than it was in 2012, but that change is consistent with the neutral application of a variety of competing redistricting principles.

291. More than 70% of the population of old District 3 remains in new District 3.

292. The requirement that substantial population be added to Districts 1 and 2 unavoidably required moving those districts westward toward New York City.

293. District 3 therefore necessarily had to shift to its west as well.

294. District 3 could not be shifted to its south without causing District 4 to shift to its west.

295. Shifting District 4 to its west would have required moving substantial minority population out of District 5 into District 4.

296. Removing substantial minority population from District 5 would have implicated concerns about diluting minority voting strength because District 5 was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

297. The incumbent Member of Congress representing District 5, Gregory Meeks, is African-American.

298. Removing substantial population out of District 5 also would have disturbed the core of that district.

299. Shifting District 3 to its west, and not to its south, avoided removing substantial minority population from District 5.

300. Because it was necessary to add 268,272 people to District 3 from outside of Nassau or Suffolk Counties, and because District 3, like all districts, must be contiguous, District 3 had to shift to the west into Queens.

301. The communities in Queens that are included in new District 3 are similar in character to the Nassau communities just across the Nassau-Queens border.

302. Because it was necessary to add 268,272 people to District 3, its westward expansion could not stop in eastern Queens.

303. Shifting District 3 into the heart of Queens would have required removing substantial Asian population from District 6.

304. Removing substantial minority population from District 6 would have implicated concerns about diluting minority voting strength because District 6 was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

305. The incumbent Member of Congress representing District 6, Grace Meng, is Asian-American.

306. District 6 is the only district in New York represented by an Asian-American.

307. Removing more population from District 6 than was necessary would have disturbed the core of that district.

308. The only way to add the additional population to District 3 that was required without removing substantial minority population from District 5 or District 6 and substantially disturbing the cores of those districts was to shift District 3 to its west through northern Queens and into the Bronx.

309. Shifting District 3 into the Bronx implicates concerns about diluting minority voting strength because each of the existing districts located wholly or partially in the Bronx,

Districts 13, 14, 15, and 16, were and remain districts in which minority voters have the opportunity to elect the candidate of their choice.

310. The incumbent Member of Congress representing District 13, Adriano Espaillat, is Hispanic.

311. The incumbent Member of Congress representing District 14, Alexandria Ocasio-Cortez, is Hispanic.

312. The incumbent Member of Congress representing District 15, Ritchie Torres, is Hispanic.

313. The incumbent Member of Congress representing District 16, Jamaal Bowman, is African-American.

314. The Westchester communities that have been included in District 3 share significant interests with the Nassau and Suffolk communities that are in District 3. Among other common interests, all of these communities are located on or near the Long Island Sound and thus share common interests with respect to coastal management, interests that many believe are becoming more vital due to climate change and that are directly affected by the work of the Army Corps of Engineers and other federal resources and policies relating to environmental issues.

315. The Bronx population that has been included in District 3 enables District 3 to reach communities of interest in Westchester contiguously.

316. Given that removing substantial minority population from Districts 13, 14, 15, or 16 would have implicated concerns about diluting minority voting strength, and given that the suburban communities along the Long Island Sound in Nassau and Suffolk counties share vital interests with the suburban communities along the Long Island Sound in Westchester, filling

District 3 with the additional population that was required by joining the Nassau shore suburbs with Westchester shore suburbs does not reflect any unlawful purpose.

317. The shape of new District 3 is similar to the shape of the district in a map created by the Unity Coalition, a consortium of organizations and advocates focused on issues concerning the preservation and protection of minority voting rights in New York City.

Districts 8, 9, 10, and 11 in New York City Are Not Unlawful

318. Petitioners' allegations regarding Districts 8, 9, 10, and 11 rest on false claims about these communities and ignore the complexities that redrawing these districts necessarily required.

319. The federal equal population rule required the population of former District 8 to be reduced by 27,429 people.

320. The federal equal population rule required the population of former District 9 to be increased by 21,129 people.

321. The federal equal population rule required the population of former District 10 to be reduced by 26,832 people.

322. The federal equal population rule required the population of former District 11 to be increased by 10,735 people.

323. Adding or removing the required population to or from any one of these neighboring districts necessarily affected the ability to adjust population in the others.

324. Because substantial population had to be adjusted in each of these districts, and because adjusting the population of each district affected the ability to adjust the population of the others, Districts 8, 9, 10, and 11 necessarily look different than they did under the prior plan.

325. The reapportionment of Districts 8, 9, 10, and 11 nevertheless preserved the cores of the prior districts and continued to unite nearly all of the communities of interest that were united under the prior plan, while also uniting communities of interest that had been separated under prior plans.

326. Petitioners' allegation that these districts cross "multiple bodies of water" ignores that the reapportionment of Districts 8, 9, 10, and 11 maintains the same number of water crossings that previously existed in this part of New York City.

327. Petitioners challenge what they describe as "vertical stripes" across southern Brooklyn, which they falsely suggest reflects changes that result from partisan intent.

328. In fact, the shapes of reapportioned Districts 8, 9, and 10 are substantially similar to the prior shapes of those districts. As explained below, the changes to District 11 reflect in part the changes to Districts 8, 9, and 10 that were necessitated by the need to adjust population in those districts and unite communities of interest.

329. District 8 is now more compact than its predecessor and is now located wholly within Brooklyn.

330. Moreover, District 8 experienced some of the most substantial gentrification within New York City over the past decade.

331. This gentrification implicates concerns about diluting minority voting strength because District 8 was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

332. The incumbent Member of Congress representing District 8, Hakeem Jeffries, is African-American.

333. District 9 also was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

334. The incumbent Member of Congress representing District 9, Yvette Clarke, is African-American.

335. Reconfiguring Districts 8 and 9 also had implications for nearby District 7, which was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

336. The incumbent Member of Congress representing District 7, Nydia Velazquez, is Hispanic.

337. Ignoring the substantial concern that Districts 8 and 9 had to be reconfigured in a manner that did not dilute minority voting strength, Petitioners complain that District 8 allegedly divides Orthodox Jewish and Russian-speaking people into different districts.

338. It is unclear whether Petitioners allege that Orthodox Jewish people should have been kept together with Russian-speaking people, or that Orthodox Jewish people should have been kept together with Orthodox Jewish people and that Russian-speaking people should have been kept together with Russian-speaking people.

339. District 8 united the majority of Russian-speaking people in South Brooklyn into one district, unlike the 2012 plan, which divided Russian-speaking people across three districts.

340. Petitioners' claim regarding the Orthodox Jewish community is similarly misplaced.

341. Brooklyn contains numerous different Orthodox Jewish communities. These communities share much in common, but they are also distinct in the languages they speak, the

regions of the world from which they immigrated, the nature and degree of their religious observance, and in other ways.

342. The reapportionment of Districts 8 and 9 maintained the pre-existing split of the Orthodox Jewish communities of Borough Park and Midwood that was reflected in the 2012 plan.

343. The Orthodox Jewish community in Midwood remains united in District 9 with the Orthodox Jewish community in Crown Heights.

344. District 9 unites the Orthodox Jewish communities in Midwood and Crown Heights with the Orthodox Jewish community in Ocean Parkway South. These Orthodox Jewish communities have much in common with one another, and they now are more united than they were under the 2012 plan.

345. District 8 also now unites Sheepshead Bay, Brighton Beach, Gravesend, and Manhattan Beach, Russian-speaking communities of interest that had previously been divided.

346. The reapportionment of Districts 8 and 9 preserved the cores of those districts and avoided the dilution of minority voting strength in Districts 7, 8, and 9.

347. Petitioners allege that District 10 has an unusual shape, but Petitioners ignore that the shape of District 10 has been substantially the same for the last three redistricting cycles, dating back to 1992 when it was District 8.

348. A neutral special master retained by the United States District Court for the Eastern District of New York drew District 10 as a Manhattan-Brooklyn district in 2012, and the new version of District 10 maintains substantially the same shape as the prior court-drawn version.

349. District 10 maintains the core of the prior district.

350. District 10 continues to unite the Jewish communities on the Upper West Side of Manhattan with the Orthodox Jewish community in Borough Park, just as the 2012 court-drawn plan did and as public testimony before the Commission urged it to do.

351. Linking the Orthodox Jewish communities on the Upper West Side with the Orthodox Jewish community in Borough Park caused District 10 to look the way it did in 2012 and as it continues to look today.

352. New York City has the largest Jewish population of any city in the world, but District 10 is the only New York City district represented by a Jewish Member of Congress, Jerry Nadler.

353. Petitioners complain that the Orthodox Jewish communities in Borough Park and Midwood are not united in the new map, just as they were not united in the old map. But they ignore that because of the size of the Orthodox Jewish communities in New York City and their geographic distribution throughout Brooklyn and Manhattan, it would have been impossible to draw a district that unites all of the Orthodox Jewish communities in those boroughs without cracking other communities of interest and/or disregarding other neutral redistricting principles.

354. Petitioners also assert falsely that the enacted plan divides Asian-American communities of interest in Sunset Park between Districts 10 and 11. Petitioners appear to misunderstand the demographics of Sunset Park.

355. Sunset Park includes a substantial Chinese-speaking community.

356. Sunset Park also includes a substantial Hispanic community.

357. District 10 unites the Chinese-speaking community of Sunset Park with similar Chinese-speaking communities of interest in the Chinatown neighborhood of Manhattan.

358. For the first time, District 10 also unites substantial and growing Chinese-speaking communities of interest in Bensonhurst and Bath Beach with Chinese-speaking communities in Sunset Park and Chinatown. These communities of interest share a common language, transit routes, economic pursuits, and cultural and familial ties.

359. District 10 reflects public testimony before the Commission, including from the OCA-NY (formerly the Organization for Chinese-Americans), that urged both the unification of Chinese-speaking communities in Bensonhurst and Bath Beach, which had been divided previously, and the continued linking of the Chinese-speaking community of Sunset Park with the Chinese-speaking community in Chinatown.

360. Petitioners complain that the enacted plan did not keep the Hispanic community in Sunset Park united with other Hispanic communities in Brooklyn and the Lower East Side of Manhattan. Petitioners ignore that doing that, while complying with the equal population requirement, would have required splitting the Chinese-speaking communities that are now united in District 10 and also severing other communities of interest in surrounding districts.

361. Petitioners complain that District 11 allegedly does not protect its Republican incumbent, but that allegation, even if true, does not render District 11 unlawful.

362. Petitioners cite nothing wrong with this district or any violation of neutral redistricting criteria, other than alleged partisan intent, the inverse of their partisan dissatisfaction.

363. District 11 maintains the core of the prior district in Staten Island.

364. The population of Staten Island under the 2020 census is 495,747, which is approximately 64% of an equipopulous congressional district.

365. The federal equal population rule required the population of former District 11 to include an additional 281,224 residents from outside of Staten Island.

366. Staten Island historically has been combined with territory in Brooklyn, the borough with which it shares a vehicle bridge crossing, the Verrazano Narrows Bridge.

367. New District 11 continues this historical tradition.

368. New District 11 crosses only one body of water, thereby minimizing the number of water crossings.

369. The Brooklyn portion of District 11 is reasonably compact.

370. District 11 unites communities of interest in Staten Island and Bay Ridge, the community in Brooklyn with which Staten Island has historically enjoyed the closest affiliation. Bay Ridge is contained entirely within District 11.

371. Bay Ridge and Staten Island have each historically shared significant Italian-American and Irish-American populations.

372. District 11 avoids cracking Chinese-speaking communities of interest that are now united in District 10.

373. District 11 unites communities of interest that share a common transit line, the R line.

374. Petitioners allege that there is no common thread between the Brooklyn communities in District 11, but in fact, those communities were historically linked in a shared congressional district.

375. In 1972, Bay Ridge, Sunset Park, and Park Slope shared a congressional district located entirely within Brooklyn.

376. In 1982, Bay Ridge and Sunset Park were separated from Park Slope and combined with Staten Island, in a similar configuration to the lines in the current plan.

377. By reverting to its prior route through Brooklyn, District 11 accommodates the expansion of surrounding districts and communities of interest in those districts.

378. Petitioners ignore that the configuration of District 11 is constrained by the configurations of Districts 8, 9, and 10, that the configuration of Districts 8 and 9 implicates concerns relating to minority voting strength, and that District 10 was reconfigured to extend further south to unite Chinese-speaking communities of interest.

379. District 11 remains a highly competitive district.

Districts 16, 17, 18, and 19 in the Hudson Valley Region Are Not Unlawful

380. In the upstate region, the loss of population and elimination of a district required that districts be pushed significantly to the south and east into the Hudson Valley region.

381. At the same time, the population growth within Long Island and New York City required the downstate districts to push to the north.

382. These colliding demographic forces required significant reconfiguration of the Hudson Valley region districts.

383. The federal equal population rule required the population of former District 16 to be increased by 6,570 people.

384. The federal equal population rule required the population of former District 17 to be increased by 13,220 people.

385. The federal equal population rule required the population of former District 18 to be increased by 28,529 people.

386. The federal equal population rule required the population of former District 19 to be increased by 78,298 people.

387. District 16 was and remains a district in which minority voters have the opportunity to elect the candidate of their choice.

388. The incumbent Member of Congress representing District 16, Jamaal Bowman, is African-American.

389. To comply with the equal population rule, District 16 had to push further into Westchester County.

390. Petitioners observe that District 16 previously was shaped differently and located mostly in Westchester, but they ignore the demographic pressure imposed on this area by population growth in Long Island and New York City.

391. District 16 preserves the core of the prior district and unites communities of interest in the Bronx with similar communities with shared interests in Mount Vernon and Yonkers in Westchester County.

392. District 16 had to push further north than Mount Vernon and Yonkers, but moving District 16 to the northwest would have disturbed the core of existing District 17.

393. Moving District 16 further to the east in southern Westchester County would have disturbed District 3, which as set forth above enables that district to comply with the equal population requirement without disturbing minority opportunity districts in Brooklyn, Queens, and the Bronx.

394. Moving District 16 to the east in northern Westchester County or Putnam County would have made it less compact because those areas are sparsely populated.

395. District 16 cuts a straight northern path through the towns of Yorktown and Somers. Together with Putnam Valley and Carmel to the north, this configuration created a relatively compact district.

396. District 16 unites communities of interest because the communities in District 16 on either side of the Westchester-Putnam border have more in common with one another than with the communities to their east.

397. District 16 reflects public testimony before the Commission, from a Republican elected official in Westchester, that encouraged the Commission to unite the communities of Yorktown and Somers with similar communities in Putnam County.

398. This Westchester-Putnam border region also shares the common recreational feature of Donald J. Trump State Park, which crosses the border between Westchester and Putnam Counties.

399. This distribution of population had the salutary effect of keeping communities in northeastern Westchester and southern Putnam together with similar communities on the other sides of the border in District 18.

400. The Commission's Plan A recommendation similarly included Putnam County in District 16.

401. It would not have been possible for District 17 to comply with the equal population rule if it remained confined to Westchester and Rockland Counties like it was in the 2012 plan given the expansion of other districts around it in the enacted plan.

402. District 17 preserves the core of the prior district and continues to unite Greenburgh with Mount Kisco.

403. District 17 continues to unite Hasidic Jewish communities of interest in the Town of Ramapo in Rockland County.

404. District 17 unites Orthodox Jewish communities in Sullivan County – which have grown substantially since the 2010 decennial census – with Orthodox Jewish communities in Rockland County.

405. District 17 includes a single Hudson River crossing, as it previously did.

406. That single Hudson River crossing unites communities of interest such as Nyack and Tarrytown.

407. District 17 keeps Sullivan County whole.

408. District 18 preserves the core of the prior district in Orange County, ceding some population to District 17 to enable District 17 to comply with the equal population requirement.

409. Petitioners assert that District 18 used to be a Republican-leaning district, but the prior version of District 18 elected a Democrat to Congress in every election since 2012, and new District 18 remains highly competitive.

410. Petitioners claim that District 18 was configured for partisan purposes, but that claim is undermined by their observation that District 18 includes the Republican-leaning community of Kiryas Joel.

411. District 19 maintains a similar shape to its predecessor.

412. Statewide population growth coupled with population decline to the north of District 19 required it to expand significantly. Heading into this redistricting cycle, District 19 was one of the three most under-populated districts in New York State.

413. Binghamton and Utica were previously united in District 22, which, as explained below, is the district that was eliminated because New York lost one Congressional district.

414. District 19 continues to unite Binghamton and Utica and unites them with Rensselaer and other cities that share common interests, such as Kingston, Hudson, and Oneonta.

415. Binghamton and Utica are cities with significant numbers of people that add needed population to the severely under-populated District 19.

416. District 19 also unites the southern suburbs of Albany, such as Bethlehem and East Greenbush.

417. Petitioners assert that Columbia and Greene Counties are “Republican communities,” but Columbia County voted for President Biden by a margin of 17 points in the 2020 election, and Greene County has become more Democratic.

418. District 19 keeps Columbia and Greene Counties intact, as they had been previously.

419. Petitioners claim that certain Republicans were intentionally pushed out of District 19, but Petitioners ignore that those same Republicans were placed in District 18, another district that Petitioners claim purposefully excluded Republicans.

Districts 21, 22, 23, 24, and 25 in the Southern Tier and Upstate New York Are Not Unlawful

420. New York’s congressional delegation lost a district following the 2020 decennial census.

421. The elimination of a district required the previous congressional districts to be significantly reconfigured.

422. As explained above, the upstate region experienced the greatest population decreases during the last ten years.

423. The federal equal population rule required the population of former District 20 to be increased by 30,681 people.

424. The federal equal population rule required the population of former District 21 to be increased by 71,930 people.

425. Following the 2020 decennial census, Districts 22 and 23, as previously drawn, were the most underpopulated districts in the State.

426. The federal equal population rule required the population of former District 22 to be increased by 80,361 people.

427. The federal equal population rule required the population of former District 23 to be increased by 83,462 people.

428. The federal equal population rule required the population of former District 24 to be increased by 59,664 people.

429. The federal equal population rule required the population of former District 25 to be increased by 43,930 people.

430. The federal equal population rule required the population of former District 26 to be increased by 34,520 people.

431. Due to the population decline across upstate New York and the need to eliminate a district, it made the most sense to collapse either District 22 or District 23 into surrounding districts because those districts were the most under-populated.

432. Because much of prior District 23 bordered the State's southern border, and because prior District 22 was surrounded on nearly all sides by other districts, eliminating District 22 made it easier to disperse its population into other districts.

433. Many of Petitioners' allegations concerning the upstate districts are unintelligible because they compare districts in the prior plan to the districts with the same number in the

enacted plan even though prior District 22 has been eliminated and other upstate districts have been renumbered.

434. District 20 unites communities of interest in the Albany suburbs, consistent with public testimony before the Commission that encouraged the continued unification of Troy, Albany, and Schenectady.

435. District 20 unites those areas with other communities of interest in Glens Falls and Queensbury, just as they were prior to the last redistricting cycle.

436. District 20 has become less reliably Democratic, not more so.

437. District 21 was significantly underpopulated following the 2020 census and needed to draw significant population from surrounding areas.

438. The areas closest to the core of District 21 are all rural and heavily Republican.

439. Because the areas closest to the core of District 21 are all sparsely populated, it was necessary to add several counties to District 21.

440. District 21 retains the core of the prior district and combines it with other similar communities of interest.

441. Because prior District 22 was eliminated, Petitioners' attempts to compare prior District 22 with the current District 22 are inapposite.

442. Petitioners claim that District 22 "flipped" from a competitive Republican district to a strong Democratic district, but prior District 22 no longer exists.

443. Current District 22 is most similar to prior District 24.

444. Current District 22 unites prominent centers of higher education, including Syracuse University, Cornell University, Ithaca College, SUNY Cortland, and other educational centers. These "college town" communities share similar characteristics.

445. Petitioners claim that District 22 unites Tompkins County with Onondaga County for unlawful purposes, but both plan recommendations submitted by the Commission united Tompkins County with Onondaga County.

446. District 22 reflects public testimony before the Commission that advocated for Tompkins County to be united with similar communities near Syracuse.

447. District 23 creates a unified Southern Tier district, a configuration that was supported by public testimony before the Commission.

448. Both of the plans submitted by the Commission proposed the creation of a Southern Tier district, though the Commission's proposed districts are less compact than the enacted District 23.

449. The equal population rule required substantial additional population to be added to the prior version of District 23.

450. Petitioners complain that District 23 pulls in parts of Erie County, including Buffalo suburbs.

451. In order to pull population from somewhere other than Erie County, it would have been necessary for District 23 to expand significantly to the north, such that District 23 would not have been a Southern Tier district.

452. Both of the plans submitted by the Commission drew population from Erie County to complete District 23.

453. The western portion of the upstate region includes two urban centers, Rochester and Buffalo.

454. Districts 25 and 26 preserve Rochester and Buffalo as the cores of those districts.

455. District 24 in the enacted plan did not replace prior District 24. District 24 has the most in common with prior District 27. Petitioners' comparisons of District 24 with prior District 24 therefore are inapposite.

456. District 24 keeps more than half of prior District 27 intact, thereby preserving the core of that district.

457. District 24 unites rural communities with communities of interest along Lake Ontario. District 24 spans a wide area because it is comprised of rural communities that are sparsely populated.

458. Petitioners assert that District 24 is excessively non-compact because of its length, but District 24 is approximately the same length as District 23, which is more compact than either version of the Southern Tier district proposed by the Commission.

459. Petitioners challenge the fact that part of Ontario County is in reapportioned District 25, instead of District 24. The portion of Ontario County in question contains Finger Lakes Community College. That institution and its surrounding community are now joined with other educational institutions, including the Rochester Institute of Technology, the University of Rochester, SUNY Brockport, and Monroe Community College, all of which share common interests.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

460. Petitioners lack standing to assert the claims set forth in the Petition.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

461. The Petition fails to set forth plain and concise statements and fails to set forth single allegations in each separately numbered paragraph as required under CPLR 402 and Rule 3014.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

462. The Petition fails to state a claim upon which relief can be granted.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

463. Petitioners waived any right to relief.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

464. The Petition is barred by the doctrine of estoppel.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

465. The relief Petitioners seek would sow confusion among election officials, candidates, and voters, and would unduly interfere with orderly election processes.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

466. The Petition seeks relief that is precluded by the New York State Constitution.

WHEREFORE, for all of the reasons set forth herein, in the accompanying Affidavit of Dr. Kristopher Tapp, and in the Memorandum of Law in Opposition to the Petition, Respondents respectfully request that the Court dismiss the Petition and otherwise deny the relief sought by Petitioners in the Petition in its entirety, with costs, fees, and disbursements, together with such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 24, 2022

By: /s/ Eric Hecker
Eric Hecker
Alexander Goldenberg
Alice G. Reiter

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*Attorneys for Respondent Senate Majority
Leader Andrea Stewart-Cousins and the Senate
Majority's Appointees to LATFOR*

BACKGROUND AND QUALIFICATIONS

Education

3. I received my B.A. from Grinnell College (with honors, Phi Beta Kappa) and my Ph.D. in Mathematics from the University of Pennsylvania.

Academic Employment

4. I currently am a Full Professor and the Chair of the Mathematics Department at Saint Joseph's University. Prior to that, I taught mathematics at Haverford College, SUNY Stony Brook, Bryn Mawr College, Williams College, the University of Pennsylvania, and Suffolk University. My research was supported by National Science Foundation grants during portions of my time at several of these institutions.

Publications and Presentations

5. I am the author of three textbooks. I have published 24 research papers in refereed journals, including some of the top journals in mathematics. I have presented research talks at about 50 conferences and seminars including in Germany, Argentina, Mexico, Canada, and Spain.

6. For the last four years, my primary research focus has been mathematical questions related to redistricting.

7. My first publication on this topic was *Measuring Political Gerrymandering*, which was published in *American Mathematical Monthly*, the most widely read mathematics journal in the world. This peer-reviewed paper explored the mathematical properties of the *efficiency gap* and its variants. I was invited to speak about the results of this peer-reviewed paper at the *Geometry of Redistricting Workshop* in San Francisco and also at the *University of Arizona Conference on Redistricting*.

8. My second research paper on this topic was *Clustering and Expected Seat-Share for District Maps*, published in *Communications in Statistics – Theory and Methods*. In this peer-reviewed paper, I used ensemble methods to quantify and precisely explore how a political party's political geography (particularly its clustering) affects the outcome of an election. This peer-reviewed paper included an ensemble analysis for congressional maps of Pennsylvania.

9. My third research paper was *Spanning Tree Bounds for Grid Graphs*. All of the popular methods for ensemble analysis of district maps today rely on spanning trees. There are several purely mathematical questions about spanning trees that the mathematics community hopes to solve in order to improve the theoretical foundation on which these methods are built. In this peer-reviewed paper, I addressed and solved a specific mathematical question about counting spanning trees, providing a better understanding of why today's ensemble methods naturally generate compact districts without needing to be specifically directed to do so.

10. In short, my recent research has focused on the mathematics that undergirds modern algorithms for analyzing district maps.

11. A copy of my curriculum vitae is attached as Exhibit A to this affidavit.

SCOPE OF ENGAGEMENT AND COMPENSATION

12. I have been retained by Cuti Hecker Wang LLP, counsel for Respondent Senate Majority Leader and President Pro Tempore of the Senate Andrea Stewart-Cousins, and asked to opine on the validity of the analysis used and the conclusions drawn in the report submitted by Sean Trende.

13. I am being compensated at a rate of \$400.00 per hour. My compensation does not depend in any way on the outcome of the case or on the opinions or testimony that I provide.

MATERIALS REVIEWED

14. In connection with preparing this testimony and providing the opinions expressed herein, I have reviewed the following materials:

- Report of Sean Trende submitted on behalf of the Petitioners in this case;
- Relevant portions of Article III, Section 4(c) of the New York Constitution setting forth applicable redistricting criteria; and
- McCartan & Imai, *Sequential Monte Carlo for Sampling Balanced and Compact Redistricting Plans*.

SUMMARY OF EXPERT OPINIONS

15. Mr. Trende's stated opinion is that the enacted congressional map was drawn for the purpose of favoring the Democratic Party. Based on my analysis of the report and its methodology, I hold the following opinions to a high degree of professional certainty:

- a. Mr. Trende's data clearly supports the opposite conclusion: that the enacted congressional map favors the Republican Party. For example, his data shows that the enacted map gives the Democrats 22 seats, whereas almost every one of the 5,000 randomly generated maps in his ensemble gives the Democrats at least 22 seats, substantially more than half of those maps give the Democrats at least 23 seats, and a good number of the maps give the Democrats 24 or 25 seats. If we take at face value Mr. Trende's assertion that his 5,000 maps represent "what maps would tend to look like in New York if they were drawn without respect for politics," then the only reasonable conclusion is that the enacted map is significantly Republican-favoring relative to maps drawn without attention to politics.

- b. Mr. Trende’s methodology is so deeply flawed that the ensemble he created is not a representative sample of maps that could be drawn without partisan considerations, and the results he produced have no meaningful statistical value. Among other significant flaws in Mr. Trende’s methodology, his model fails to account for a number of the redistricting criteria that are required by New York law. Accordingly, Mr. Trende’s analysis is unreliable.

Background on Methods Used by Mr. Trende

Background on Ensemble Methods

16. Ensemble methods for assessing district maps sprung up in the previous decade and quickly became a mainstay of partisan gerrymandering litigation. The basic idea is to construct an *ensemble* of thousands or millions of randomly generated district maps. The enacted map is then compared to the ensemble. If the enacted map is a statistical outlier – for example, if the enacted map is likely to elect significantly more members from one political party than do the maps in the ensemble – this is taken as evidence that the enacted map was drawn with partisan intent.

17. For such a conclusion to be reasonable, the algorithm generating the ensemble of random maps cannot use any partisan data. But a partisan-blind algorithm is not enough. To yield meaningful and reliable statistical conclusions, it is imperative that the algorithm sample from a prescribed *target distribution*. To understand what is meant by a “target distribution,” imagine a jurisdiction with such a small population that there are only 100 possible ways to apportion the population into districts. If one wanted to build an ensemble of 10 such maps, one could direct a computer to do the equivalent of putting the 100 maps into a hat and selecting 10 of them at random with equal likeliness. That is called a *uniform target distribution* because all

of the compliant maps are equally likely to appear in the ensemble. One also could direct a computer to weight the 100 maps such that the ones with better compactness scores are more likely to be selected for the ensemble. Such a *weighted target distribution* might be reasonable, provided that the weighting formula is appropriate. But it would be problematic, and would fatally undermine the results, if some of the maps generated by the algorithm failed to comply with applicable redistricting requirements.

18. In real states, there are countless numbers of potential compliant maps, so a computer cannot do the equivalent of identifying all of them, putting them in a hat, and selecting an ensemble from among the maps in the hat. Mathematicians therefore have developed methods to sample from the uniform target distribution (or any prescribed target distribution) even when the complete sets involved would be too large to store in a computer. These sampling methods are often called *Monte Carlo* methods. They are at the heart of most of the commonly used algorithms for generating ensembles of district plans.

Background on the Gerrymandering Index

19. The partisan analysis in Mr. Trende's report is based almost exclusively on the *gerrymandering index*. This measurement was first proposed by a research team based at Duke University; see *Redistricting: Drawing the Line*, Bangia, et al., 2017, arXiv:1704.03360. Mr. Trende's report appears to mischaracterize what the gerrymandering index does and does not measure. It therefore is necessary to explain the gerrymandering index and the *ordered district plots* on which this index is based.

20. *Ordered district plots* and the *gerrymandering index* are best understood with a hypothetical example of a state with three congressional districts. The outcome of an election using the enacted map can be represented by a vector, which means a list of three numbers –

namely, the Democratic vote shares in the three districts listed in increasing order. For example, suppose that

$$\textit{Enacted} = (.25, .60, .75)$$

which means that in the most Republican-leaning district, 25% of the votes (only counting votes for the two major parties) went to the Democratic candidate; in the middle district, 60% went to the Democratic candidate, and in the most Democrat-leaning district, 75% went to the Democratic candidate. This vector is represented by the three black dots in the ordered district plot shown in Figure 1 below. Notice that two of the three seats went to the Democratic candidate (because two of black dots are above the dashed .5 line).

21. Imagine a hypothetical ensemble of five randomly generated maps. The simulated election outcome in each map yields a corresponding vector that is plotted as three green dots in Figure 1 below. In this hypothetical example,

$$\textit{Ensemble Average} = (.19, .70, .72)$$

which means that, among the five maps in the ensemble, the Democratic vote shares in their most Republican-leaning districts averaged to 19%, the Democratic vote shares in their middle districts averaged to 70%, and the Democratic vote shares in their most Democrat-leaning districts averaged to 72%. In other words, the average heights of the three columns of green dots are respectively .19, .70, and .72.

22. The gerrymandering index is just the distance between the Enacted vector and the Ensemble Average vector (considered as points in three-dimensional space); in other words:

$$\textit{gerrymandering index} = \sqrt{(.25 - .19)^2 + (.60 - .70)^2 + (.75 - .72)^2} \approx .12$$

23. Notice that the gerrymandering index is larger when the three illustrated blue brackets are taller:

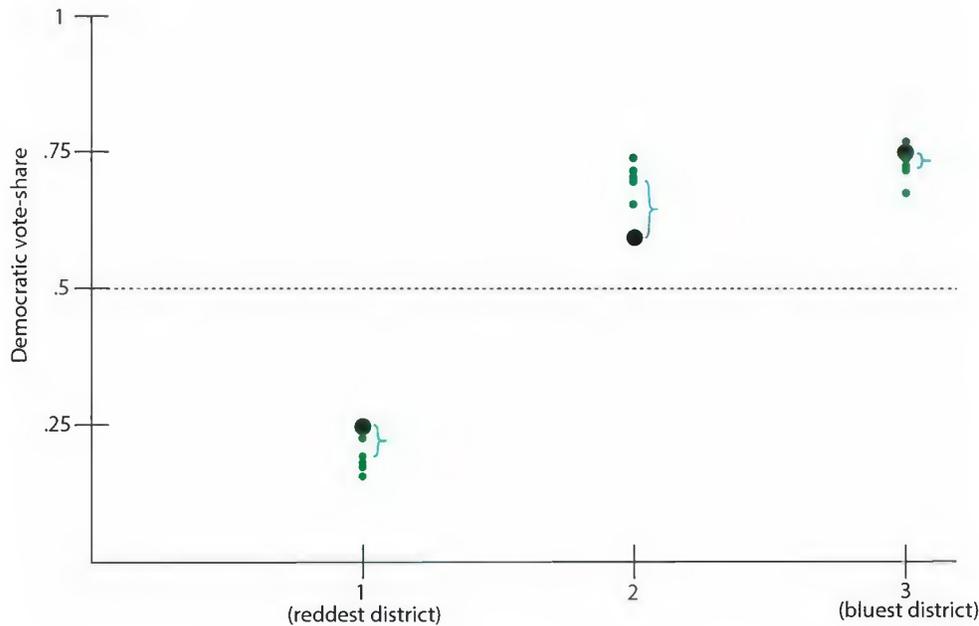


Figure 1: The ordered district plot for a hypothetical toy example

24. Because Mr. Trende’s report includes ordered district plots, it is important to note the types of information that can be recovered from such a plot. In our hypothetical example, we know from the plot that all five maps in the ensemble elected two Democrats and one Republican (because all of the green dots at horizontal position “1” are below the 50% line, while all of the green dots at positions “2” and “3” are above it).

25. Thus, the gerrymandering index summarizes how closely the enacted map’s vector matches the vectors of the maps in the ensemble. Importantly, there are two things that the gerrymandering index does *not* do:

- The gerrymandering index does *not* provide any information about *which party* is favored by the enacted map relative to the ensemble, or even whether there is a favored party.
- The gerrymandering index does *not* provide any information about whether the enacted map discourages competitive districts relative to the ensemble.

26. There are a variety of factors that can cause the gerrymandering index to be large. This can happen if the enacted map is systematically biased towards the Republican party (relative

to the ensemble). It can happen if the enacted map is systematically biased towards the Democratic party. It can happen if the enacted map is drawn to protect incumbents from both parties without any overall partisan lean. It can happen if the enacted map has fewer competitive districts than average maps. It can happen if the enacted map has more competitive districts than average maps. It can happen because of differences between the enacted map and the ensemble that do not influence the election outcome at all. It can happen for any mixture of these reasons.

ANALYSIS OF MR. TRENDE'S CONCLUSIONS

27. As detailed below, Mr. Trende's methodology has such substantial flaws that his model has little if any statistical value. Notwithstanding those methodological flaws, I begin by taking at face value Mr. Trende's claim that his ensemble of 5,000 maps represents "what maps would tend to look like in New York if they were drawn without respect for politics."

Conclusions about Partisan Bias

28. There are standard methods for measuring the partisan bias of an enacted map relative to an ensemble. The simplest method is to plot a histogram showing how many districts are likely to be won by Democrats (among all of the maps in the ensemble) and compare this to the number of districts that are likely to be won by Democrats using the enacted map. If the enacted map deviates too far from the average, this is seen as evidence that the map was drawn to favor one political party.

29. Mr. Trende did not perform this type of analysis. But the information found in his ordered district plots (pages 15 and 21) can be used to determine what such a histogram and analysis would have looked like. Under such an analysis, it is 100% certain that the congressional map has a Republican-favoring partisan bias relative to Mr. Trende's ensemble. This is the opposite of what he claims.

30. The chart on page 15 of Mr. Trende's report, titled "Democratic Vote Share by Simulated District," indicates that the enacted map is likely to give the Democrats 22 seats. (This is reflected by the black dots for the districts numbered 1 through 4 below the dashed 50% line, indicating higher Republican vote shares, and the black dots for the districts numbered 5 through 26 above the 50% line, indicating higher Democratic vote shares.) By comparison, virtually all of the 5,000 maps in Mr. Trende's ensemble are likely to give the Democrats at least 22 seats; substantially more than half are likely to give the Democrats at least 23 seats; and a good number are likely to give the Democrats 24 or 25 seats. (This is reflected by which proportion of the shaded coloring is red and below the 50% line, or blue and above the 50% line, for each of the numbered districts.) On average, the maps in his ensemble clearly are likely to give the Democrats more seats than does the enacted map.

31. Indeed, a careful review of the chart on page 15 of Mr. Trende's report shows that the outcome that is overwhelmingly most likely statistically is a plan that gives the Democrats 23 seats. The next most likely outcome is not a plan that gives Democrats 22 seats, like the enacted plan, but rather a plan that gives Democrats 24 seats, *i.e.*, 2 more seats than the enacted plan.

32. In other words, the only conclusion that can be drawn from Mr. Trende's data is that the enacted map is significantly Republican-favoring relative to the maps in Mr. Trende's ensemble.

33. Mr. Trende suggests incorrectly that the gerrymandering index proves partisan bias. On page 15 of his report, he writes that "[i]f the Enacted Congressional Map was not drawn to favor or disfavor a political party, or did so only moderately, it should hew close to the results produced by simulated maps [equivalently, it should have a small gerrymandering index]." That is wrong. Partisan lean is only one of many factors that can make the

gerrymandering index high, and to the extent that partisan lean contributed to the high gerrymandering index in Mr. Trende's analysis, it was clearly a *Republican*-favoring lean that made the gerrymandering index high.

34. In summary, Mr. Trende's data proves the opposite of what he claims. The enacted congressional map is substantially more favorable to Republicans than the maps in his ensemble.

ANALYSIS OF MR. TRENDE'S METHODOLOGY

35. In this section, I will analyze the methodology that Mr. Trende used to construct his ensemble, and I will examine whether his ensemble is a representative sample of nonpartisan maps.

Mr. Trende's Lack of Relevant Experience

36. Mr. Trende notes in his expert report that he is currently a doctoral candidate and has not yet received his Ph.D.

37. It is my understanding that Mr. Trende has never published a peer-reviewed article, much less a peer-reviewed article concerning ensemble analysis or any other mathematical analysis of gerrymandering.

38. Mr. Trende's report does not indicate a very deep understanding of the underlying algorithm he employs. For example, he suggests on page 8 that spanning trees are constructed by breaking adjacencies (which is not what the algorithm he employs does because this would not work). On the same page, he incorrectly asserts that sets with more than two precincts are guaranteed to have multiple spanning trees. On page 7, he describes ensemble algorithms as "potentially subject to a variety of parameters," which suggests to me a surface-level engagement with the interface of an algorithm that someone else coded.

Lack of Reproducibility

39. Mr. Trende's report contains almost no information about his methodology, which makes it impossible for me to reproduce his result or definitively diagnose his errors. His report lacks the key information that would be required to check the validity of his ensemble. This omission alone is cause for serious concern.

40. What I do know based on the limited information that Mr. Trende provides in his report is that Mr. Trende uses the *redist* package in the *R* programming language (available at <https://alarm-redist.github.io/posts/2021-04-02-redist-300/>). This package includes coding for several popular algorithms to generate ensembles. It appears from Mr. Trende's report that he used the *redist_smc* package, which is based on the very new *Sequential Monte Carlo* technique developed in the paper: McCartan & Imai, *Sequential Monte Carlo for Sampling Balanced and Compact Redistricting Plans*.

Missing Constitutional Requirements

41. One flaw in Mr. Trende's methodology is that he only incorporates a subset of the criteria that the New York Constitution requires to be taken into consideration in redistricting.

42. Mr. Trende's report indicates that he instructed the simulation model to consider three criteria in generating the simulated New York districts: (1) districts must be equipopulous within a population tolerance of +/- 1%; (2) districts must be reasonably compact; and (3) districts should avoid county splits. (His underlying algorithm also guarantees that districts are contiguous.)

43. Mr. Trende's model does not in any way take into account a number of the criteria that the New York Constitution states shall be used in redistricting. Among other factors, Mr. Trende's model does not take into account the following considerations:

- whether the districts would result in the denial or abridgement of racial or language minority voting rights;
- whether the districts are drawn so that racial or minority language groups do not have less opportunity to participate in the political process than other members of the electorate and to elect representatives of their choice;
- the maintenance of cores of existing districts;
- the maintenance of cities;
- the maintenance of towns; or
- the maintenance of communities of interest.

44. Mr. Trende does not explain why, or even acknowledge that, his model fails to incorporate those constitutionally-required considerations.

45. Because Mr. Trende's model does not include those considerations, the model is incapable of doing what Mr. Trende contends that it does, *i.e.*, "create an 'ensemble' of maps that reflect what we would expect in a state if maps were drawn without respect to partisan criteria." In Mr. Trende's model, "partisan criteria" is not the only variable that is excluded; the model also excludes these six other considerations that are not only permissible, but mandatory, for the mapmaker to consider. As a result, Mr. Trende's ensemble maps are not a representative sample of *legally compliant* nonpartisan maps. Indeed, the universe of possible maps that Mr. Trende's model created and drew its samples from includes many maps that would be unlawful. The same is likely true about some, if not many, of the 5,000 maps in Mr. Trende's ensemble. (Mr. Trende did not provide detailed information about the 5,000 simulated maps in his ensemble, so it is not possible to analyze the specific attributes of any of those maps.)

46. Mr. Trende acknowledges that his model does not consider data on race or racially polarized voting, and does not consider the need to comply with the Voting Rights Act in generating the ensemble of simulated maps. Instead, Mr. Trende examines after the fact the

number of majority-minority districts (which he calls “minority majority districts”). I am not an expert on the Voting Rights Act, but my understanding is that counting majority-minority districts is a crude and incomplete proxy for the ability of minority voters to elect their candidates of choice, and that merely counting the number of majority-minority districts does not determine whether a particular map complies with the Voting Rights Act or the New York Constitution; *see* Computational Redistricting and the Voting Rights Act, Becker et al.

47. Mr. Trende does not define how he is measuring “Minority Majority Districts,” so it is not clear if he is including any district in which there is a White voting age population of less than 50%, any district in which a single racial minority group constitutes over 50% of the voting age population, or something else.

48. Because Mr. Trende only considers the number of “Minority Majority Districts” without a more detailed analysis, my understanding is that his analysis does not accurately compare whether the ensemble maps comply with the Voting Rights Act to the same extent as the enacted maps.

49. Beyond the Voting Rights Act, Mr. Trende does not even mention the other redistricting considerations that are omitted from his model, and he makes no attempt to incorporate those considerations or to check how those omissions affect his ensemble.

Flaws in Defining the Target Distribution

50. Setting aside Mr. Trende’s failure to include a number of mandatory redistricting considerations in his model, even with respect to those he does include (equal population, compactness, and avoiding county splits), Mr. Trende does not provide enough information about his methodology to evaluate whether his model produces a representative sample of nonpartisan maps that comply with those criteria.

51. The question of whether Mr. Trende's ensemble is a representative sample of nonpartisan maps that were drawn using his specified criteria depends on how the model defines the *target distribution*. For example, if Mr. Trende were to claim that he is sampling from the *uniform target distribution*, then the question would be: does his ensemble behave as if its 5,000 maps were selected from among all possible compliant maps uniformly? That is, does the algorithm guarantee that all compliant maps are equally likely to be chosen for his ensemble?

52. Mr. Trende does not specify any target distribution at all, except to say that the ensemble is meant to replicate a scenario in which 5,000 humans were sent forth to draw maps without access to partisan information. Depending on how its parameters are set, the McCartan-Imai algorithm is capable of sampling from the uniform distribution. It is possible that Mr. Trende attempted to target the uniform distribution on "compliant" maps (with "compliant" interpreted to mean that the maps comply with the limited selection of constitutional requirements that he elected to consider: contiguity, compactness, population equality, and county preservation, without consideration of the other constitutional requirements).

53. But even this depends on the method by which Mr. Trende asked the algorithm to preserve counties. McCartan and Imai describe two choices: a slow method that requires the user to do more of the work by hand, and a fast method that functions essentially like a switch built into the algorithm's user interface. If Mr. Trende used this "county preservation switch," then this would render the algorithm incapable of also targeting the uniform distribution. When this switch method is used, then many compliant maps have zero probability of making it into the ensemble.

54. In summary, it is not clear based on the limited information that Mr. Trende has provided whether his ensemble has produced a representative sample of nonpartisan maps even with respect to the few constitutional requirements that he chose to incorporate into his model.

Flaws in Mr. Trende's Application of the McCartan-Imai Model

55. I have read the McCartan-Imai paper (on which the ensemble-generation algorithm used by Mr. Trende is based) carefully, and I think that the probability calculations are clever and elegant. But because the algorithm is so new, and because of some technical under-the-hood considerations, I believe that a lot of extra care is required to use this algorithm in redistricting litigation. Extra care is particularly required in selecting a large enough ensemble size. The McCartan-Imai paper is not yet published in a refereed journal. In fact, it very recently received a referee report that requires the authors to make some significant changes to the paper. Their paper remains a work in progress.

56. In contrast, the more commonly used *Markov Chain* algorithms were developed and tested and improved over several years by multiple teams of mathematicians and statisticians working sometimes together and sometimes in parallel. The kinks have been worked out. The foundational issues have been clearly delineated and studied.

57. One limitation of the older *Markov Chain* method is that it is typically impossible to rigorously decide how large of an ensemble one needs. Conscious of this limitation, practitioners are careful to run all kinds of validations. To verify that an ensemble of, say, 50,000 maps in a specific state is large enough for a specified purpose, practitioners can re-create the ensemble multiple times. They can create larger ensembles. They can use different starting seeds. They can verify that none of these changes affect the outcome, all of which provides strong evidence that 50,000 was enough.

58. I am very surprised that Mr. Trende constructed an ensemble of only 5,000 maps using a brand-new method, and that he apparently performed no such validations to check that 5,000 is enough. Personally, I believe that 5,000 probably is not enough for this particular application. New York has over 15,000 precincts that must be partitioned into 26 congressional districts. The larger the number of precincts and districts, the larger the ensemble that is needed. The McCartan-Imai algorithm is very different from the more established Markov Chain algorithms, and not much is known yet about the required ensemble size. There are technical reasons to expect that very large ensembles might be necessary, especially if one wishes to target the uniform distribution or any other target distribution that differs significantly from the mathematically complicated “spanning-tree” distribution, which the algorithm is natively inclined to target. Even if you knew that 5,000 maps were enough with the county-preserving switch turned off, they might not be enough with the switch turned on. This switch affects a major change to the core working of the algorithm, so all bets would be off.

59. In summary, I will not be surprised if the McCartan-Imai algorithm grows into a standard part of the redistricting analysis tool kit, but right now I think that a lot of extra care is required to use in court an algorithm that has received so little test driving. It certainly should never be used without validations to check that the ensemble size is adequate and that the ensemble is structurally sound. Moreover, it should not be used by someone who only engages its user interface at a surface level without thinking carefully about how its inner workings might affect the results in a particular case, as Mr. Trende seems to have done.

Summary of Analysis of Methodology

60. In summary, I believe with a high degree of professional certainty that Mr. Trende's methodology is flawed and that the ensemble he created is not a representative sample of lawful maps that could be drawn without partisan considerations.

Dated: February 24, 2022

Kristopher R. Tapp
Kristopher R. Tapp

Sworn and Subscribed before me this 24th
day of February, 2022

Brandy M. Connor
Notary Public

My Commission Expires: *September 28, 2024*

Commonwealth of Pennsylvania - Notary Seal
BRANDY M. CONNOR, Notary Public
Philadelphia County
My Commission Expires September 28, 2024
Commission Number 1004805

CERTIFICATE OF CONFORMITY PURSUANT TO N.Y. C.P.L.R. § 2309(c)

I, Michael J. Corusso, do hereby certify and attest that I am an attorney duly admitted to practice law in the Commonwealth of Pennsylvania

I make this certification for the purposes of compliance with New York State Civil Practice Law & Rules Section 2309(c) with regard to the foregoing Affidavit of Kristopher R. Tapp, to be filed in Supreme Court in Steuben County, State of New York.

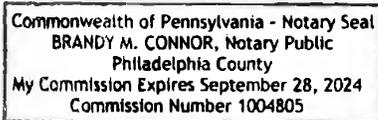
Said Affidavit, acknowledged and sworn by Mr. Tapp before a Notary Public in and for the Commonwealth of Pennsylvania, and said Affidavit being therein sworn in the Commonwealth of Pennsylvania, is and appears to be, based upon my review of said document and notarization thereof, in conformity with the laws of the Commonwealth of Pennsylvania for the making of an affidavit and the notarization thereof.


PA Bar # 203684
NY Bar # 5731435

Sworn and Subscribed before me this 24th day of February, 2022


Notary Public

My Commission Expires: *September 28, 2024*



EXPERT REPORT OF STEPHEN ANSOLABEHERE,
DATED FEBRUARY 24, 2022 [865 - 897]

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INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND MARIANNE
VOLANTE,

Index No. E2022-0116CV

Petitioners,

-against-

GOVERNOR KATHY HOCUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

**EXPERT REPORT OF
STEPHEN ANSOLABEHERE
FEBRUARY 24, 2022**

Expert Report of Stephen Ansolabehere

QUALIFICATIONS AND EXPERTISE

1. I am the Frank G. Thompson Professor of Government in the Department of Government at Harvard University in Cambridge, MA. Formerly, I was an Assistant Professor at the University of California, Los Angeles, and I was Professor of Political Science at the Massachusetts Institute of Technology, where I held the Elting R. Morison Chair and served as Associate Head of the Department of Political Science. I am the Principal Investigator of the Cooperative Congressional Election Study (CCES), a survey research consortium of over 250 faculty and student researchers at more than 50 universities. I also directed the Caltech/MIT Voting Technology Project from its inception in 2000 through 2004 and served on the Board of Overseers of the American National Election Study from 1999 to 2013. I am an election analyst for and consultant to CBS News' Election Night Decision Desk. I am a member of the American Academy of Arts and Sciences (inducted in 2007). My curriculum vitae is attached to this report as Appendix A.

2. I worked as a consultant to the Brennan Center in the case of *McConnell v. FEC*, 540 U.S. 93 (2003). I have testified before the U.S. Senate Committee on Rules, the U.S. Senate Committee on Commerce, the U.S. House Committee on Science, Space, and Technology, the U.S. House Committee on House Administration, and the Congressional Black Caucus on matters of election administration in the United States. I filed an amicus brief with Professors Nathaniel Persily and Charles Stewart on behalf of neither party to the U.S. Supreme Court in the case *cf Northwest Austin Municipal Utility District Number One v. Holder*, 557 U.S. 193 (2009), and an amicus brief with Professor Nathaniel Persily and others in the case of *Evenwel v. Abbott*, 138 S.Ct. 1120 (2015). I have served as a testifying expert for the Gonzales intervenors in *State cf Texas v. United States* before the U.S. District Court for the District of Columbia (No. 1:11-cv-01303); the Rodriguez plaintiffs in *Perez v. Perry*, before the U.S. District Court for the Western District of Texas (No. 5:11-cv-00360); for the San Antonio Water District intervenor in *LULAC v. Edwards Aquifer Authority in the U.S. District Court for the Western District cf Texas* (No. 5:12cv620-OLG); for the Department of Justice in *State cf Texas v. Holder*, before the U.S. District Court for the District of Columbia (No. 1:12-cv-00128); for the Guy plaintiffs in *Guy v. Miller* in the First Judicial District Court in Carson City, Nevada (No. 11-OC-00042-1B); for the Florida Democratic Party in *In re Senate Joint Resolution cf Legislative Apportionment* in the Florida Supreme Court (Nos. 2012-CA-412, 2012-CA-490); for the Romo plaintiffs in *Romo v. Detzner* in the Circuit Court of the Second Judicial Circuit in Florida (No. 2012 CA 412); for the Department of Justice in *Veasey v. Perry*, before the U.S. District Court for the Southern District of Texas, Corpus Christi Division (No. 2:13cv00193); for the Harris plaintiffs in *Harris v. McCrory* in the U.S. District Court for the Middle District of North Carolina (No. 1:2013cv00949); for the Bethune-Hill plaintiffs in *Bethune-Hill v. Virginia State Board cf Elections* in the U.S. District Court for the Eastern District of Virginia (No. 3: 2014cv00852); for the Fish plaintiffs in *Fish v. Kobach* in the U.S. District Court for the District of Kansas (No. 2:16-cv-02105-JAR); and for intervenors in *Voto Latino, et al. v. Hobbs*, in the U.S. District Court for the District of Arizona (No. 2:19-cv-05685-DWL). I served as an expert witness and filed an Affidavit in the North Carolina State Board of Elections hearings regarding absentee

ballot fraud in the 2018 election for Congressional District 9 in North Carolina. I have been accepted as an expert in every matter in which I have been proffered as an expert witness.

3. My areas of expertise include American government, with particular expertise in electoral politics, election administration, representation, redistricting, political geography, and public opinion, as well as statistical methods in social sciences and survey research methods. I have authored numerous scholarly works on voting behavior and elections, the application of statistical methods in social sciences, legislative politics and representation, and distributive politics. This scholarship includes articles in such academic journals as the Journal of the Royal Statistical Society, American Political Science Review, American Economic Review, American Journal of Political Science, Legislative Studies Quarterly, Quarterly Journal of Political Science, Electoral Studies, and Political Analysis. I have published articles on issues of election law in the Harvard Law Review, Texas Law Review, Columbia Law Review, New York University Annual Survey of Law, and Election Law Journal, for which I am a member of the editorial board. I am associate editor of the Harvard Data Science Review, I and have served as associate editor of the Public Opinion Quarterly. I have coauthored three scholarly books on electoral politics in the United States, The End of Inequality: Baker v. Carr and the Transformation of American Politics, Going Negative: How Political Advertising Shrinks and Polarizes the Electorate, and The Media Game: American Politics in the Media Age. I am coauthor with Benjamin Ginsberg, Hahrie Han, and Ken Shepsle of American Government: Power and Purpose.

4. I have been retained by counsel at the rate of \$600 an hour.

SOURCES

5. Census, voting, and district boundary data are from the New York State Legislative Taskforce on Demographic Research and Reapportionment (LATFOR). <https://latfor.state.ny.us/data/>

6. Additional precinct-level elections data for 2016 come from the MIT Election Data Sciences Lab. <https://electionlab.mit.edu/data> and are cross-checked with summary data posted at Dave's Redistricting, www.davesredistricting.org.

7. ALARM shape file for 2020 Census data by precinct: <https://github.com/alarm-redist/census-2020>.

8. Maps of New York City neighborhoods (NTAs) come from the New York City Department of City Planning: <https://www1.nyc.gov/site/planning/data-maps/city-neighborhoods.page>.

STATEMENT OF INQUIRY

9. I have been asked by counsel to examine and respond to the expert reports of Claude LaVigna and Sean Trende.

SUMMARY OF FINDINGS

10. Contrary to the claims of LaVigna and Trende, there is no evidence of substantial partisan bias that favors the Democratic Party and its incumbents in the 2022 New York Congressional Map.

11. Trende offers a computer simulation of 5,000 maps. Based on his simulations, one would expect there to be three Republican Congressional Districts (CDs). In the enacted 2022 Map, there are four Republican CDs.

12. LaVigna repeatedly mischaracterizes the voting history and partisan orientation of New York's congressional districts. LaVigna offers no statistical evidence to support his claims concerning the voting behavior of districts and communities, and these claims repeatedly prove false. Implementing LaVigna's proposed changes to the map would produce a substantial partisan bias in favor of the Republican party.

13. LaVigna repeatedly asserts that there are no compelling reasons apart from party and incumbency for the 2022 New York Congressional District Map. He offers no analysis of other traditional redistricting principles to support that assertion.

14. Closer examination of the map reveals four clear principles that appear to have guided the configuration of the 2022 New York Congressional District Map. First, uneven population growth across the State of New York and the loss of one congressional district required substantial changes in district boundaries. The disproportionate population loss in the rural areas of Upstate New York meant that one of the Upstate rural districts had to be eliminated. Equalizing district populations, then, required substantial changes in boundaries.

15. Second, the state legislature maintained a high degree of core retention of the CDs enacted in 2012 and in place through the 2020 election. Core retention is a traditional redistricting principle; it respects communities of interest as reflected in the boundaries of the 2012 New York Congressional District Map.

16. Third, the configuration of congressional districts by the state legislature clearly follows the need to respect communities of interest. The map, for example, maintains four Upstate urban districts centered in Albany, Buffalo, Rochester, and Syracuse.

17. Fourth, the New York Congressional District Map maintains nine congressional districts in which minorities are the majority of the population and would be able to elect their preferred candidates. Trende claims that there may be as many as 12 majority-minority districts, but he offers no evidence that the majority-minority districts that his computer simulations generated are required by the Voting Rights Act or even that they actually provide minority voters with an opportunity to elect candidates of their choice.

FINDINGS

A. Population

18. Claude LaVigna repeatedly states that the changes in boundaries were motivated by party and incumbency. He offers no assessment of the fundamentals driving the change in the Congressional Map. First among these is population. The loss of one Congressional District (CD) and shrinking populations in Upstate rural areas means that one of the rural Upstate CDs had to be eliminated in order achieve population equality across all CDs. As discussed in the next section 2012 CD-22 is the district that is dismantled. Even still, almost all of the CDs in the state must have their boundaries moved in order to achieve population equality.

19. From 2010 to 2020, the population in New York State grew by 4.1% to reach a total of slightly over 20.2 million residents.¹ Despite this growth, the state narrowly lost a congressional seat in the decennial reapportionment process, going from 27 districts to 26.² Substantial changes to the map are required because the State of NY lost one CD in reapportionment. The ideal district population for the 2022 Map is 776,971 people, which is the state population divided by the number of CDs (26). The 2012 Map was adopted by the federal district court in the case *Favors v. Cuomo*.³ Under district boundaries for the 2012 Map, which had 27 districts, only CDs 5, 8, 10, and 12 had at least 776,971 people. All four of these CDs in are New York City. All other CDs in the State had too few people.

20. There were also substantial shifts of population within New York State, as presented in the NY State Comptroller's report on the 2020 Census.⁴ Specifically, the regions of New York City, Long Island, and the Mid-Hudson Valley (north Suburban New York City) saw a combined population growth of 824,899 people (6.2%), while many of the upstate rural areas of the State lost population, especially the Southern Tier (-3.0% decline), North Country (-2.9%), and Mohawk Valley (-2.2%) regions.⁵ Even within the regions with overall population decline, urban areas grew while rural cities and towns shrunk.⁶

21. For the purposes of this analysis, I distinguish four regions of the state: Long Island, New York City, Mid-Hudson Valley (or north Suburban), and Upstate. I assign a CD to a region if that CD draws a majority of its population from the counties in that region. Under the 2012 Map, Long Island consists of CD-1, CD-2, CD-3, and CD-4. A majority of the population of these 4 CDs are in either Nassau or Suffolk Counties. New York City consists of CD-5 through CD-15. A majority of the populations of these 11 CDs are in the five boroughs of New York City. The Mid-Hudson Valley (or north Suburban) region consists of CD-16, CD-17, and CD-18. A majority of these CDs are in Dutchess, Orange, Putnam, Rockland, Sullivan, or

¹ DiNapoli, Thomas P., State Comptroller. "2020 Census: Municipal Population Shifts in New York State" *Cj fice of the New York State Comptroller* <https://www.osc.state.ny.us/files/local-government/publications/pdf/2020-census-municipal-population-shifts-in-new-york-state.pdf>

² <https://www.nytimes.com/2021/04/26/nyregion/new-york-census-congress.html>

³ *Favors v. Cuomo* in the U.S. District Court in the Eastern District of New York 1:2011cv05632, 2012 WL928223.

⁴ DiNapoli, *supra* note 1, Figure 2

⁵ *Ibid*

⁶ *Ibid*, Figures 3-4

Westchester Counties. Upstate corresponds to CD-19 through CD-27 under the 2012 Map. These nine CDs are located in the counties in the northern and in the western parts of the state.

22. All four areas of the state were under-populated under the 2012 Map. The loss of one CD, then, affects all regions of the state. However, population changes occurred unevenly throughout the State of New York, with the most severe under-population being in Upstate New York.

23. Upstate. All of the Upstate NY CDs were under-populated under the 2012 Map. Combined the nine upstate Congressional Districts had population deficit of 539,725, or three quarters of a district. There is no neighboring area from which to draw population to maintain nine upstate CDs, as the Mid-Hudson (North Suburban NYC) area, which borders the Upstate region, also has a population deficit. Therefore, this region had to lose a district.

24. Long Island. All four CDs on Long Island were underpopulated. Combined these CDs have a population deficit of 148,667. Constrained by the geography of Long Island and the state boundary, these districts had to move westward to capture enough population to satisfy the equal population requirement.

25. New York City. Four of the NYC CDs (5, 8, 10, and 12) were over-populated and seven CDs (6, 7, 9, 11, 13, 14, and 15) were under-populated. Combined the 11 CDs in NY City had a population deficit of 40,257.

26. Mid-Hudson (north Suburban). CD-16, CD-17, and CD-18 were all under-populated. Combined these three CDs had a population deficit of 48,319.

B. Core Retention

27. LaVigna criticizes the 2022 NY Congressional District map as lacking any clear justification other than party and incumbency. (See page 3.) He does not offer a comprehensive analysis of traditional redistricting principles and approaches, such as respect for communities of interest or core retention of existing districts. Instead, LaVigna focuses on a limited number of areas to which he offers objections. I will address those specific boundary objections in the sections below on Partisan Bias and Communities of Interest.

28. LaVigna fails to account for core retention in his analysis. Core retention is the extent to which the new district boundaries respect past district boundaries. Past district boundaries often reflect communities of interest and other considerations that were approved and accepted. Drawing completely new lines can also lower voter information and turnout.⁷ In my experience, legislatures and commissions almost always begin the redistricting process with the existing district map and make adjustments to that map to address specific problems, such as population deficits and surpluses.

⁷ Daniel Hayes and Seth C. McKee, "The Participatory Effects of Redistricting," *American Journal of Political Science* 53 (2009): 1006-1023.

29. I have analyzed the geographic area and population retention of each of the 2012 districts in the 2022 districts. I consider a 2022 CD as the analogous version of the 2012 CD if at least half of the population of the 2012 CD was put into a 2022 CD. Using this approach all of the numbering of the 2012 CDs in the State aligns with the 2022 CDs except for CD-22, CD-24, and CD-27.

30. Renumbering of districts from the 2012 to the 2022 map occurs in the Upstate region due to the loss of one seat and the necessary shift of district lines.

31. 2022 CD-24 is the analogue of 2012 CD-27. Sixty-eight percent of the area and 59 percent of the people in 2012 CD-27 are in 2022 CD-24. This district represents the rural areas of northwestern New York along Lake Ontario.

32. 2022 CD-22 is the analogue of 2012 CD-24. Seventy-five percent of the people from 2012 CD-24 are in 2022 CD-22. Both versions of this district represent the Syracuse area.

33. 2012 CD-22 is the district that was dismantled due to the loss of a district in Upstate New York.

34. On average, 77 percent of the areas covered by the 2012 CDs remain in the 2022 versions of those CDs. Based on my experience in this field, this is a high level of core area retention, especially considering that one district had to be eliminated.

35. On average, 75 percent of the population that was in the 2012 CDs remains in the 2022 CDs. Again, based on my experience, this is a high level of core population retention, especially considering that one district had to be eliminated.

36. The most substantial changes in population and geographic area of Congressional Districts occur in the Upstate region because the region no longer has enough population to support nine CDs. The loss of an upstate district has a ripple effect on the neighboring Mid-Hudson region, CD-16, CD-17, and CD-18. These north Suburban districts also have too little population and must shift northward to absorb the surplus population created by dismantling CD-22.

37. In the Long Island area, CD-1, CD-2 and CD-3 must move to the west to increase their populations. CD-4 has a relatively small population deficit. It required the least change in the region and is kept almost entirely in its current location. Even still the Long Island CDs retain the lion's share of their populations. 77 percent of the area in the 2012 version of CD-1 remains in the 2022 version of CD-1; 82 percent of the area of the 2012 version of CD-2 remains in the 2022 version of CD-2; 87 percent of the area of the 2012 version of CD-3 remains in the 2022 version of CD-3; and 100 percent of the area of the 2012 version of CD-4 remains in the 2022 version of CD-4. These districts are not, as LaVigna claims, "entirely rearranged" in the case of CD-1 and CD-2 or "completely transformed" in the case of CD-3.

38. Core retention is a traditional redistricting principle. The 2022 Map exhibits a high degree of core retention. LaVigna's report does not examine this principle as a possible justification for the configuration of the New York Congressional District map. Nor do the simulations

conducted by Trende give any weight to core retention in randomly generating his simulated CDs.

C. Partisan Bias

C.1. Overall Partisan Bias Claims

C.1 (i) LaVigna Analysis

39. The LaVigna report claims that the 2022 New York Congressional District Map

“creates a partisan gerrymander with no coherent explanation except for seeking partisan and incumbent-protection advantage for the Democratic Party.” (LaVigna, Page 3)

LaVigna offers no analysis to substantiate this assertion of the degree of the bias and no overall assessment of how many districts must be changed in order to achieve an unbiased map. Nor does the report offer an assessment of whether the overall map would become less biased if the court were to adopt his proposed changes or make corrections to the objections he raises.

40. It is evident that the changes that LaVigna proposes would amount to a pro-Republican gerrymander. LaVigna raises objections to the configuration of Long Island, Staten Island, Mid-Hudson, and Upstate districts, suggesting that additional Republican seats are possible in each of these regions. The plan already has a slight pro-Republican Partisan Bias. Adding any one additional Republican district would increase significantly the bias of the plan – however that is measured – in the Republican direction. Adding four additional Republican districts, as LaVigna suggests, would make the map overwhelmingly biased in favor of Republicans. What Lavigna describes, then, is an extreme pro-Republican gerrymander.

C.1 (ii) Trende Analysis

41. Sean Trende conducts simulations for the plaintiffs of 5,000 districting plans that he states are “reasonably compact” and “which respect county subdivisions.” He, then, concludes the legislature-enacted congressional districts “favor[] Democratic interests more than any of the[] 5,000 computer-generated maps, all drawn without partisan considerations.”

42. Taking Trende’s simulations at face value undercuts Trende’s and LaVigna’s claims that additional Republican seats ought to be created. The simulation results on Page 15 of Trende’s report show that under the assumptions of Trende’s simulation there definitely ought to be two Republican seats and there probably ought to be a third Republican seat. The two definite seats arise in all of the simulations. A third Republican seat arises in most, but not all simulations (based on the graph, about three out of four randomly drawn maps). A fourth seat would rarely be Republican, occurring in perhaps one out of four simulations. A fifth Republican seat, as is recommended by the LaVigna report, would be extremely unlikely to arise by chance. Taking the simulations at face value, and following the interpretation given in Trende’s report, the

implication of the simulation results is that the creation of five or more Republican seats would be very unlikely to have occurred by chance and would be indicative of partisan gerrymandering.

43. The 2022 Map creates four Republican CDs. That is consistent with the result that the map shows a slight partisan bias in favor of Republicans, as Trende's simulations would yield an expectation of Republicans winning only three seats. (See Page 15 of the Trende Report.)

44. Trende characterizes the 2022 Map as extremely unlikely to have arisen by chance. In support of this claim he offers a composite indicator, called the Gerrymandering Index, due to Bangia et al. (2017). The indicator measures whether there is an unusually large number of safe seats relative to what one would expect under the assumptions of a specific simulation. First, the indicator is highly dependent on the assumptions of the simulations. Second, the index is not instructive about how many seats need to be shifted one way or the other in order to balance the map for the purposes of eliminating any partisan slant in the map.

45. The results of simulations depend crucially on their inputs. Trende's simulations prioritize not splitting county lines. That places a value on that criterion above others. Communities of interest, for instance, are not always compact, and sometimes they span multiple counties. Thus, the simulations will not appropriately take into account communities of interest that follow anything other than county lines. As an example, consider CD-3. In both the 2012 map and in the 2022 map, that district represents the coastal communities on the western end of Long Island sound. This community of interest is cognizable with shared economic and local governmental issues. This region spans multiple counties, but not in ways that follow county boundaries.

46. Trende's simulated maps evidently do not follow core areas or past district boundaries. Trende's simulation resulted in CDs that split between 12 and 16 counties. Yet, the old congressional district map split 19 counties. If the simulations are not set up to preserve communities of interest, they will not reflect the broad set of considerations that legislatures must take into account in making districting plans, and hence cannot be used to infer partisan intent.

47. Increasing the number of Republican seats, as is argued by LaVigna, would only increase the partisan bias of the map in favor of Republicans. None of Trende's simulations predicts 6 or 7 Republican CDs; 5 Republican CDs would be extraordinarily unlikely; and, even, 4 Republican CDs would occur with a very low probability. If the 2022 map indeed favors one of the parties, Trende's simulations underscore it is the Republican party.

C.2. Specific Partisan Claims

CD-1 and CD-2

48. LaVigna at pages 3 and 4 of his report states:

“The new map moves areas with high populations of Republican voters into new Congressional District 2 while moving heavily Democratic communities into Congressional District 1. The

Republican communities in Brookhaven on Long Island's South Shore are now in District 2, whereas the strongly Democratic areas in the center of Long Island are now in District 1. This partisan revision creates multiple new town splits and adds an additional county split where Congressional District 1 now extends into Nassau County between Oyster Bay and Huntington. The Legislature effectively shifted Congressional District 1 from a strong Republican district into a Democrat-leaning district by packing Republicans into Congressional District 2. In addition, this redrawing turned District 2 from a sure Republican district into an overwhelmingly Republican stronghold."

There are factually incorrect statements in this paragraph.

49. First, 2012 CD-1 is not a "strong Republican district." The average vote for candidates for statewide office in 2016, 2018, and 2020 was 50.4 percent Democratic and 49.6 percent Republican. If anything, CD-1 has a slight lean to the Democrats. Democratic candidates for statewide office won the majority of the vote in precincts in 2012 CD-1 in four out of six contests (i.e., 2016 President, 2016 US Senate, 2018 US Senate, 2018 Governor, 2018 Attorney General, and 2020 President).

50. Second, 2012 CD-2 is not "a sure Republican district." The average vote for candidates for statewide office in 2016, 2018, and 2020 was 51.8 percent Democratic and 48.2 percent Republican. Hence, CD-2 was a Democratic leaning district. Democratic candidates for statewide office won the majority of the vote in precincts in 2012 CD-2 in four out of six contests.

CD-3

51. LaVigna claims that

"In drawing the Congressional District 3 in this way, the Legislature decreased competitiveness, transforming Congressional District 3 from a competitive district to a Democrat stronghold."

52. This statement is false. The 2012 version of CD-3 was already a strong Democratic district; it was not a competitive seat. The average vote for candidates for statewide office in 2016, 2018, and 2020 was 57.7 percent Democratic and 42.3 percent Republican in 2012 CD-3. Democratic candidates for statewide office won the majority of the vote in precincts in 2012 CD-3 in six out of six contests.

CD-8, CD-9, CD-10, and CD-11

53. LaVigna states that

"The new Congressional Districts 8, 9, 10, and 11 illustrate how the Legislature 'cracked' established Republican-leaning communities of interest in Brooklyn to create a partisan advantage for Democrats."

54. LaVigna's description of Brooklyn fails to acknowledge an obvious and compelling reason for the configuration of this area that is separate from party or incumbency. CD-8, CD-9 and neighboring CD-7 are majority minority districts. Their configuration affects the configuration of CD-10 and CD-11.

55. From 2016-2020, the voters in 2012 CD-8, 2012 CD-9, 2012 CD-10, and 2012 CD-11 on average voted more for Democrats than for Republicans. Democrats won, on average, 86.5 percent of the vote in 2012 CD-8, 85.5 percent of the vote in 2012 CD-9, and 79.7 percent of the vote in 2012 CD-10. In 2012 CD-11, Democrats on average won 51.1 percent of the vote and Republicans won 47.1 percent of the vote, and Democrats won the majority of the vote in four out of six statewide elections in the precincts in the 2012 version of CD-11. None of these are Republican districts.

CD-16, CD-17, and CD-18

56. LaVigna claims that 2012 CD-18 was a lean Republican district that switched to "lean Democratic." This claim is false. All three of the Mid-Hudson districts usually voted for Democrats. Under the 2012 Map, CD-16, CD-17, and CD-18 are Democratic districts. From 2016-2020, Democrats on average won 78 percent of the Democratic plus Republican vote in CD-16, 64 percent of the vote in CD-17, and 54 percent of the vote in CD-18.

57. Under the 2022 Map, CD-16, CD-17, and CD-18 remain Democratic districts. From 2016-2020, Democrats on average won 72 percent of the Democratic plus Republican vote in CD-16, 60 percent of the vote in CD-17, and 55 percent of the vote in CD-18. Not only were all three of these districts Democratic under the 2012 map, but the changes in Democratic performance by the 2022 Map are extremely small.

58. LaVigna claims that the 2022 Map "Congressional District 16 'cracks' Republican voters out of CD-18." And that "it connects Republican towns of Putnam Valley, Carmel, Yorktown and Somers to densely populated Democratic communities." This claim is factually incorrect. These are not "Republican towns." (LaVigna page 5) These four towns combined split their vote fairly evenly between the parties. Carmel and Putnam Valley lean Republican, but Yorktown and Somers lean Democratic. From 2016-2020, the average vote in Somers was 51.3 percent Democrat and 48.7 percent Republican, in Yorktown 54.0 percent Democratic and 46.0 percent Republican.

CD-19

59. LaVigna claims that CD-19 in the 2012 map was a lean Republican district that has been changed to a lean Democratic district. This claim is false. It was a lean Democratic district in the 2012 Map and remains so in the 2022 Map. From 2016 to 2020, Democrats won, on average, 51 percent of the Democratic share of the two party vote, and they won the majority of the vote in four out of six statewide elections. Under the 2022 Map, in those same elections, Democrats won on average 56 percent of the vote, and they won a majority of the vote in five out of six elections. Even if you remove Bethlehem (Albany) or Utica (Oneida), and Binghamton (Broome) from CD-19, the remaining area is still 54-46 Democratic.

CD-22

60. LaVigna states that the 2022 Map flips CD-22 from Republican to Democratic. This interpretation reflects confusion about the numbering of the CDs. As explained above, new CD-22 contains 75 percent of the population of old CD-24. The change in the configuration of 2012 CD-24 was required by the loss of an upstate district. In both the 2012 and 2022 map, this remains the district anchored in Syracuse. Hence, 2012 CD-24 should be compared to 2022 CD-22.

61. Comparing the election results in 2012 CD-24 to those in 2022 CD-22 reveals that in fact there was very little change in the electoral performance of the Syracuse District. From 2016 to 2020, the Democrats won on average 57 percent of the vote in the precincts in 2012 CD-24, and they won the majority five of six elections. The Democrats won on average 60 percent of the vote in the precincts in the analogous district in the 2022 Map, 2022 CD-24, and they won the majority in six of six elections. That is hardly a complete reversal. In both maps, this district is a Democratic district.

D. Minority Representation

62. Trende finds that in his simulations there are as few as 8 and as many as 12 minority CDs. He comments that there may be as many as 12 “consistent with the Voting Rights Act.” (page 18)

63. Trende offers no racially polarized voting analysis to assess whether any of the majority-minority CDs in these simulations are required. Trende offers no racial cohesion and polarization analysis, such as would be part of a Voting Rights Act analysis of a map, as laid out in *Thornburg v. Gingles*. As such, it is unknown if any of the districts in the simulations would be required under Section 2 of the Voting Rights Act.

64. Trende offers no assessment of the performance of the majority-minority CDs in his simulations. It is unknown as to whether any of these simulated districts would in fact be districts in which minorities would have the opportunity to elect their preferred candidates. Some of them might in fact be majority-minority in their composition but not districts in which the minorities can elect their preferred candidates.

E. Communities of InterestE.1. Upstate

65. The Upstate districts reflect two distinctive sorts of communities of interest – urban areas and rural areas. There are four population centers Upstate – Buffalo, Rochester, Syracuse, and Albany. Between these centers, there are extensive rural areas.

66. The 2012 Map anchored one CD in each of the Upstate population centers. They were 2012 CD-26 (Buffalo), 2012 CD-25 (Rochester), 2012 CD-24 (Syracuse), and 2012 CD-20 (Albany).

67. The Enacted Map follows exactly the same approach. It creates four CDs anchored in the four Upstate population centers. The Buffalo district is 2022 CD-26. The Rochester district is 2022 CD-25. The Syracuse district is 2022 CD-22 (*note the renumbering*). The Albany district is CD-20.

68. The geographic areas of the Upstate urban districts are kept largely the same from the 2012 Map to the 2022 Map. Specifically, 100 percent of the area of 2012 CD-26 is contained in 2022 CD-26; 95 percent of the area of 2012 CD-25 is in 2022 CD-25; and 86 percent of the area of 2012 CD-20 is in 2022 CD-20. The 2012 version of the Syracuse district was old district CD-24, and the 2022 version of the Syracuse district is new CD-22 and contains 75 percent of the population of the old district.

69. The 2012 Map had five rural Upstate CDs. They were 2012 CD-19, 2012 CD-21, 2012 CD-22, 2012 CD-23, and 2012 CD-27.

70. The 2022 Map consolidates the rural CDs into four rural districts. These are 2022 CD-19, 2022 CD-21, 2022 CD-23, and 2022 CD-24. The large majority of the area of the 2012 versions of these CDs are kept in the 2022 versions of these CD. Specifically, 60 percent of the area of 2012 CD-19 remains in 2022 CD-19; 88 percent of the area of 2012 CD-21 remains in 2022 CD-21; 83 percent of the area of 2012 CD-23 is in 2022 CD-23; and 64 percent of the area of 2012 CD-24 is in 2022 CD-24. A large majority (87%) of the area of 2012 CD-22 was distributed to the new rural districts: from the 2012 CD-22, 23% of the area goes to 2022 CD-19, 36% of the area goes to 2022 CD-21, 21% of the area goes to 2022 CD-23, and a remaining 7% goes to 2022 CD-24. In addition, new CD-24 covers 68 percent of the area of old CD-27. In every instance, the majority of the area of the 2012 version of the CD remains as the core of the 2022 version of the analogous CD.

71. In short, the configuration of the 2022 Map in Upstate New York follows the same communities of interest as were reflected in the 2012 Map, creating four urban upstate districts to represent Albany, Buffalo, Rochester and Syracuse and four upstate rural districts.

E.2. Long Island

72. LaVigna's report claims that there is significant alteration of boundaries in the Long Island region. (LaVigna pages 3 and 4) In fact, the 2022 Map retains a very high percentage of the area of the Long Island CDs. Specifically, 77 percent of the geographic area of 2012 CD-1 remains in 2022 CD-1; 82 percent of the area of 2012 CD-2 remains in 2022 CD-2; 87 percent of the area of 2012 CD-3 remains in 2022 CD-3; and 100 percent of the area of 2012 CD-4 remains in 2022 CD-4. See Figure 1.

73. Nassau and Suffolk Counties both tend to vote Democratic. In statewide elections from 2016-2020 in Suffolk County, Democratic candidates won, on average, 52.8 percent of the Democratic plus Republican votes cast, compared to 47.2 percent for Republicans. In statewide

elections from 2016-2020 in Nassau County, Democratic candidates won, on average, 57.8 percent of the Democratic plus Republican votes cast, compared to 42.2 percent for Republicans.

74. CD-3 represents Inner Long Island Sound. This is a recognized ecological zone. Both sides are part of the Long Island Sound Watershed, which is defined and managed by the NY Department of Environmental Conservation.⁸ CD-3 connects the Stewardship Areas on both sides of Long Island Sound that are under the oversight of the Long Island Sound Study, a long-standing regional planning and conservation organization. These areas include Huckleberry and Davids Islands and Pelham Bay Park in Pelham Bay and the Edith G. Read Marshland in Rye, as well as sites on the Long Island.⁹ These areas are significantly tied to the New York City economy and have large commuter populations who work in New York City and live in these suburban towns. Both the 2012 and 2022 versions of CD-3 are entirely within the same commuting zone. The areas newly incorporated into CD-3 in the 2022 Map have similar commuting patterns and incomes to those who were included in the 2012 CD-3.¹⁰

E.3. New York City

75. LaVigna objects to the boundary between CD-8, CD-9 and CD-10 as those, he claims, split Asian and Jewish communities. He does not specify where these communities are located. Nor does he describe where, how and to what extent they are divided. He does not recognize any other feature of the districts that might relate to these boundaries.

76. CD-8, CD-9, and neighboring CD-7 are majority-minority districts. The configuration of CD-8 and CD-9 and their boundary with CD-10 clearly serves the purpose of representing minority voters.

77. The Jewish communities in this part of Brooklyn are concentrated in Borough Park and Midwood.¹¹ The configuration of 2012 CD-10 was approved by a federal court and was meant to connect Jewish communities in Borough Park with Jewish communities on the upper West Side.¹² Under the 2022 Map, Borough Park is wholly in CD-10, and Midwood is wholly in CD-9.

E.4. Mid-Hudson

78. LaVigna objects to the apparent division of Jewish communities in Orange, Rockland, and Sullivan counties along the border of CD-17 and CD-18. He argues that this population should be united in a single district and that division of these communities is evidence of anti-Republican gerrymandering.

⁸ <https://www.dec.ny.gov/lands/53733.html>

⁹ https://longislandsoundstudy.net/wp-content/uploads/2011/10/management_plan.pdf

¹⁰ NYC Planning, "Ins and Outs of Commuting," Research Release, September 2019. <https://www1.nyc.gov/assets/planning/download/pdf/planning-level/housing-economy/nyc-ins-and-out-of-commuting.pdf>

¹¹ Borough Park: <https://www.nytimes.com/2020/09/25/nyregion/coronavirus-orthodox-jewish-communities.html>; Midwood: <https://www.nytimes.com/2009/12/06/realestate/06livi.html>

¹² *Favors v. Cuomo* (E.D.N.Y. 2012, case 1:2011cv05632, 2012WL928223).

79. LaVigna's complaint rests with boundaries and the Jewish communities in Orange, Rockland, and Sullivan Counties. He states that all of these communities should be in the same district and that the exclusion of the Kiryas Joel community makes CD-17 reliably Democratic. (page 5). LaVigna offers no evidence that these communities vote the same way or align with the Republican Party, and he offers no evidence that the exclusion of Kiryas Joel makes CD-17 more Democratic.

80. The first problem with this claim is the assertion that the exclusion of Kiryas Joel makes CD-17 more Democratic. In fact, the voting record shows that this community on average votes two-thirds Democratic. The average vote of the Kiryas Joel community in the 2016, 2018, and 2020 elections was 67.3 percent Democratic and 31.2 percent Republican, with the remainder going to other candidates. Kiryas Joel voted 94 percent for Andrew Cuomo for Governor and 93 percent for Kirsten Gillibrand for Senator in 2018; it voted 93 percent for Charles Schumer for Senator in 2016.

81. A second problem with the claim that these communities ought to be in the same district is that there is no precedent for putting these communities in the same district. These communities were not all in the same Congressional District in the 2012 Map.

82. The Orange, Rockland, and Sullivan County Jewish communities are not electorally aligned. The Orange County community of Kiryas Joel voted 67 percent Democratic from 2016 – 2020. The Town of Fallsburg in Sullivan County, where the Orthodox community is concentrated, divides its votes evenly between the parties. The average vote in 2016, 2018, and 2020 in Fallsburg was 48.8 percent Democratic and 47.3 percent Republican. The Orthodox community in Rockland County is concentrated in the town of Ramapo, especially East Ramapo and Monsey. The Town of Ramapo voted, on average, 56.3 percent Democratic and 41.6 percent Republican.

CONCLUSIONS

83. The 2022 New York Congressional District Map is a fair map. Using the standard indicators to detect partisan gerrymandering it is clear that the 2022 Map, if anything, favors Republicans, but that tilt is a slight one. By Trende's own analysis, there ought to be three Republican CDs. The New York State Legislature created four.

84. The State Legislature appears to have followed traditional redistricting principles in creating this map. These include respect for communities of interest, retention of core areas of the existing map, ensuring appropriate minority representation, and, of course, population equality.

85. LaVigna offers no statistical analysis to support his claims, and his characterization of the voting behavior of specific communities and of congressional districts repeatedly prove false.

86. The requests to create additional Republican districts in specific areas, especially by Claude LaVigna, would result in a pro-Republican gerrymander and would create a substantial pro-Republican bias in the map.

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APPENDIX A

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EDUCATION

Harvard University	Ph.D., Political Science	1989
University of Minnesota	B.A., Political Science	1984
	B.S., Economics	

PROFESSIONAL EXPERIENCE

ACADEMIC POSITIONS

2016-present	Frank G. Thompson Professor of Government, Harvard University
2008-present	Professor, Department of Government, Harvard University
2015-present	Director, Center for American Politics, Harvard University
1998-2009	Elting Morison Professor, Department of Political Science, MIT (Associate Head, 2001-2005)
1995-1998	Associate Professor, Department of Political Science, MIT
1993-1994	National Fellow, The Hoover Institution
1989-1993	Assistant Professor, Department of Political Science, University of California, Los Angeles

FELLOWSHIPS AND HONORS

American Academy of Arts and Sciences	2007
Carnegie Scholar	2000-02
National Fellow, The Hoover Institution	1993-94
Harry S. Truman Fellowship	1982-86

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- 2013 *American Government*, 13th edition. With Ted Lowi, Benjamin Ginsberg and Kenneth Shepsle. W.W. Norton.
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- 2010 *The Future of Nuclear Power*, Revised.
- 2006 *The Future of Coal*. MIT Press. Continued reliance on coal as a primary power source will lead to very high concentrations of carbon dioxide in the atmosphere, resulting in global warming. This cross-disciplinary study – drawing on faculty from Physics, Economics, Chemistry, Nuclear Engineering, and Political Science – develop a road map for technology research and development policy in order to address the challenges of carbon emissions from expanding use of coal for electricity and heating throughout the world.
- 2003 *The Future of Nuclear Power*. MIT Press. This cross-disciplinary study – drawing on faculty from Physics, Economics, Chemistry, Nuclear Engineering, and Political Science – examines the what contribution nuclear power can make to meet growing electricity demand, especially in a world with increasing carbon dioxide emissions from fossil fuel power plants.
- 2002 “Election Day Registration.” A report prepared for DEMOS. This report analyzes the possible effects of Proposition 52 in California based on the experiences of 6

states with election day registration.

- 2001 *Voting: What Is, What Could Be.* A report of the Caltech/MIT Voting Technology Project. This report examines the voting system, especially technologies for casting and counting votes, registration systems, and polling place operations, in the United States. It was widely used by state and national governments in formulating election reforms following the 2000 election.
- 2001 “An Assessment of the Reliability of Voting Technologies.” A report of the Caltech/MIT Voting Technology Project. This report provided the first nationwide assessment of voting equipment performance in the United States. It was prepared for the Governor’s Select Task Force on Election Reform in Florida.

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- 2008 “Voting Technology and Election Law” in *America Votes!*, Benjamin Griffith, editor, Washington, DC: American Bar Association.
- 2007 “What Did the Direct Primary Do to Party Loyalty in Congress” (with Shigeo Hirano and James M. Snyder Jr.) in *Process, Party and Policy Making: Further New Perspectives on the History of Congress*, David Brady and Matthew D. McCubbins (eds.), Stanford University Press, 2007.
- 2007 “Election Administration and Voting Rights” in *Renewal of the Voting Rights Act*, David Epstein and Sharyn O’Hallaran, eds. Russell Sage Foundation.
- 2006 “The Decline of Competition in Primary Elections,” (with John Mark Hansen, Shigeo Hirano, and James M. Snyder, Jr.) *The Marketplace of Democracy*, Michael P. McDonald and John Samples, eds. Washington, DC: Brookings.

- 2005 “Voters, Candidates and Parties” in *Handbook of Political Economy*, Barry Weingast and Donald Wittman, eds. New York: Oxford University Press.
- 2003 “Baker v. Carr in Context, 1946 – 1964” (with Samuel Isaacharoff) in *Constitutional Cases in Context*, Michael Dorf, editor. New York: Foundation Press.
- 2002 “Corruption and the Growth of Campaign Spending”(with Alan Gerber and James Snyder). *A User’s Guide to Campaign Finance*, Jerry Lubenow, editor. Rowman and Littlefield.
- 2001 “The Paradox of Minimal Effects,” in Henry Brady and Richard Johnston, eds., *Do Campaigns Matter?* University of Michigan Press.
- 2001 “Campaigns as Experiments,” in Henry Brady and Richard Johnson, eds., *Do Campaigns Matter?* University of Michigan Press.
- 2000 “Money and Office,” (with James Snyder) in David Brady and John Cogan, eds., *Congressional Elections: Continuity and Change*. Stanford University Press.
- 1996 “The Science of Political Advertising,” (with Shanto Iyengar) in *Political Persuasion and Attitude Change*, Richard Brody, Diana Mutz, and Paul Sniderman, eds. Ann Arbor, MI: University of Michigan Press.
- 1995 “Evolving Perspectives on the Effects of Campaign Communication,” in Philo Warburn, ed., *Research in Political Sociology*, vol. 7, JAI.
- 1995 “The Effectiveness of Campaign Advertising: It’s All in the Context,” (with Shanto Iyengar) in *Campaigns and Elections American Style*, Candice Nelson and James A. Thurber, eds. Westview Press.
- 1993 “Information and Electoral Attitudes: A Case of Judgment Under Uncertainty,” (with Shanto Iyengar), in *Explorations in Political Psychology*, Shanto Iyengar and William McGuire, eds. Durham: Duke University Press.

Working Papers

- 2009 “Sociotropic Voting and the Media” (with Marc Meredith and Erik Snowberg), American National Election Study Pilot Study Reports, John Aldrich editor.
- 2007 “Public Attitudes Toward America’s Energy Options: Report of the 2007 MIT Energy Survey” CEEPR Working Paper 07-002 and CANES working paper.

- 2006 "Constituents' Policy Perceptions and Approval of Members' of Congress" CCES Working Paper 06-01 (with Phil Jones).
- 2004 "Using Recounts to Measure the Accuracy of Vote Tabulations: Evidence from New Hampshire Elections, 1946 to 2002" (with Andrew Reeves).
- 2002 "Evidence of Virtual Representation: Reapportionment in California," (with Ruimin He and James M. Snyder).
- 1999 "Why did a majority of Californians vote to lower their own power?" (with James Snyder and Jonathan Woon). Paper presented at the annual meeting of the American Political Science Association, Atlanta, GA, September, 1999. Paper received the award for the best paper on Representation at the 1999 Annual Meeting of the APSA.
- 1999 "Has Television Increased the Cost of Campaigns?" (with Alan Gerber and James Snyder).
- 1996 "Money, Elections, and Candidate Quality," (with James Snyder).
- 1996 "Party Platform Choice - Single- Member District and Party-List Systems,"(with James Snyder).
- 1995 "Messages Forgotten" (with Shanto Iyengar).
- 1994 "Consumer Contributors and the Returns to Fundraising: A Microeconomic Analysis," (with Alan Gerber), presented at the Annual Meeting of the American Political Science Association, September.
- 1992 "Biases in Ecological Regression," (with R. Douglas Rivers) August, (revised February 1994). Presented at the Midwest Political Science Association Meetings, April 1994, Chicago, IL.
- 1992 "Using Aggregate Data to Correct Nonresponse and Misreporting in Surveys" (with R. Douglas Rivers). Presented at the annual meeting of the Political Methodology Group, Cambridge, Massachusetts, July.
- 1991 "The Electoral Effects of Issues and Attacks in Campaign Advertising" (with Shanto Iyengar). Presented at the Annual Meeting of the American Political Science Association, Washington, DC.
- 1991 "Television Advertising as Campaign Strategy: Some Experimental Evidence" (with Shanto Iyengar). Presented at the Annual Meeting of the American Association for Public Opinion Research, Phoenix.

- 1991 “Why Candidates Attack: Effects of Televised Advertising in the 1990 California Gubernatorial Campaign,” (with Shanto Iyengar). Presented at the Annual Meeting of the Western Political Science Association, Seattle, March.
- 1990 “Winning is Easy, But It Sure Ain’t Cheap.” Working Paper #90-4, Center for the American Politics and Public Policy, UCLA. Presented at the Political Science Departments at Rochester University and the University of Chicago.

Research Grants

- 1989-1990 Markle Foundation. “A Study of the Effects of Advertising in the 1990 California Gubernatorial Campaign.” Amount: \$50,000
- 1991-1993 Markle Foundation. “An Experimental Study of the Effects of Campaign Advertising.” Amount: \$150,000
- 1991-1993 NSF. “An Experimental Study of the Effects of Advertising in the 1992 California Senate Electoral.” Amount: \$100,000
- 1994-1995 MIT Provost Fund. “Money in Elections: A Study of the Effects of Money on Electoral Competition.” Amount: \$40,000
- 1996-1997 National Science Foundation. “Campaign Finance and Political Representation.” Amount: \$50,000
- 1997 National Science Foundation. “Party Platforms: A Theoretical Investigation of Party Competition Through Platform Choice.” Amount: \$40,000
- 1997-1998 National Science Foundation. “The Legislative Connection in Congressional Campaign Finance. Amount: \$150,000
- 1999-2000 MIT Provost Fund. “Districting and Representation.” Amount: \$20,000.
- 1999-2002 Sloan Foundation. “Congressional Staff Seminar.” Amount: \$156,000.
- 2000-2001 Carnegie Corporation. “The Caltech/MIT Voting Technology Project.” Amount: \$253,000.
- 2001-2002 Carnegie Corporation. “Dissemination of Voting Technology Information.” Amount: \$200,000.
- 2003-2005 National Science Foundation. “State Elections Data Project.” Amount: \$256,000.

- 2003-2004 Carnegie Corporation. "Internet Voting." Amount: \$279,000.
- 2003-2005 Knight Foundation. "Accessibility and Security of Voting Systems." Amount: \$450,000.
- 2006-2008 National Science Foundation, "Primary Election Data Project," \$186,000
- 2008-2009 Pew/JEHT. "Measuring Voting Problems in Primary Elections, A National Survey." Amount: \$300,000
- 2008-2009 Pew/JEHT. "Comprehensive Assessment of the Quality of Voter Registration Lists in the United States: A pilot study proposal" (with Alan Gerber). Amount: \$100,000.
- 2010-2011 National Science Foundation, "Cooperative Congressional Election Study," \$360,000
- 2010-2012 Sloan Foundation, "Precinct-Level U. S. Election Data," \$240,000.
- 2012-2014 National Science Foundation, "Cooperative Congressional Election Study, 2010-2012 Panel Study" \$425,000
- 2012-2014 National Science Foundation, "2012 Cooperative Congressional Election Study," \$475,000
- 2014-2016 National Science Foundation, "Cooperative Congressional Election Study, 2010-2014 Panel Study" \$510,000
- 2014-2016 National Science Foundation, "2014 Cooperative Congressional Election Study," \$400,000
- 2016-2018 National Science Foundation, "2016 Cooperative Congressional Election Study," \$485,000

Professional Boards

Editor, Cambridge University Press Book Series, Political Economy of Institutions and Decisions, 2006-present

Member, Board of the Reuters International School of Journalism, Oxford University, 2007 to present.

Member, Academic Advisory Board, Electoral Integrity Project, 2012 to present.

Contributing Editor, *Boston Review*, The State of the Nation.

Member, Board of Overseers, American National Election Studies, 1999 - 2013.

Associate Editor, Public Opinion Quarterly, 2012 to 2013.

Editorial Board of American Journal of Political Science, 2005 to present.

Editorial Board of Legislative Studies Quarterly, 2005 to present.

Editorial Board of Public Opinion Quarterly, 2006 to present.

Editorial Board of the Election Law Journal, 2002 to present.

Editorial Board of the Harvard International Journal of Press/Politics, 1996 to 2008.

Editorial Board of Business and Politics, 2002 to Present.

Scientific Advisory Board, Polimetrix, 2004 to 2006.

Special Projects and Task Forces

Principal Investigator, Cooperative Congressional Election Study, 2005 – present.

CBS News Election Decision Desk, 2006-present

Co-Director, Caltech/MIT Voting Technology Project, 2000-2004.

Co-Organizer, MIT Seminar for Senior Congressional and Executive Staff, 1996-2007.

MIT Energy Innovation Study, 2009-2010.

MIT Energy Initiative, Steering Council, 2007-2008

MIT Coal Study, 2004-2006.

MIT Energy Research Council, 2005-2006.

MIT Nuclear Study, 2002-2004.

Harvard University Center on the Environment, Council, 2009-present

Expert Witness, Consultation, and Testimony

2001 Testimony on Election Administration, U. S. Senate Committee on Commerce.

2001 Testimony on Voting Equipment, U.S. House Committee on Science, Space, and Technology

2001 Testimony on Voting Equipment, U.S. House Committee on House Administration

2001 Testimony on Voting Equipment, Congressional Black Caucus

2002-2003 *McConnell v. FEC*, 540 U.S. 93 (2003), consultant to the Brennan Center.

2009 Amicus curiae brief with Professors Nathaniel Persily and Charles Stewart on behalf of neither party to the U.S. Supreme Court in the case of *Northwest Austin Municipal Utility District Number One v. Holder*, 557 U.S. 193 (2009).

- 2009 Testimony on Voter Registration, U. S. Senate Committee on Rules.
- 2011-2015 *Perez v. Perry*, U. S. District Court in the Western District of Texas (No. 5:11-cv-00360). Exert witness on behalf of Rodriguez intervenors.
- 2011-2013 *State of Texas v. United States*, the U.S. District Court in the District of Columbia (No. 1:11-cv-01303), expert witness on behalf of the Gonzales intervenors.
- 2012-2013 *State of Texas v. Holder*, U.S. District Court in the District of Columbia (No. 1:12-cv-00128), expert witness on behalf of the United States.
- 2011-2012 *Guy v. Miller* in U.S. District Court for Nevada (No. 11-OC-00042-1B), expert witness on behalf of the Guy plaintiffs.
- 2012 *In re Senate Joint Resolution of Legislative Apportionment*, Florida Supreme Court (Nos. 2012-CA-412, 2012-CA-490), consultant for the Florida Democratic Party.
- 2012-2014 *Romo v. Detzner*, Circuit Court of the Second Judicial Circuit in Florida (No. 2012 CA 412), expert witness on behalf of Romo plaintiffs.
- 2013-2014 *LULAC v. Edwards Aquifer Authority*, U.S. District Court for the Western District of Texas, San Antonio Division (No. 5:12cv620-OLG.), consultant and expert witness on behalf of the City of San Antonio and San Antonio Water District
- 2013-2014 *Veasey v. Perry*, U. S. District Court for the Southern District of Texas, Corpus Christi Division (No. 2:13-cv-00193), consultant and expert witness on behalf of the United States Department of Justice.
- 2013-2015 *Harris v. McCrory*, U. S. District Court for the Middle District of North Carolina (No. 1:2013cv00949), consultant and expert witness on behalf of the Harris plaintiffs. (later named *Cocper v. Harris*)
- 2014 Amicus curiae brief, on behalf of neither party, Supreme Court of the United States, *Alabama Democratic Conference v. State of Alabama*.
- 2014- 2016 *Bethune-Hill v. Virginia State Board of Elections*, U. S. District Court for the Eastern District of Virginia (No. 3:2014cv00852), consultant and expert on behalf of the Bethune-Hill plaintiffs.
- 2015 Amicus curiae brief in support of Appellees, Supreme Court of the United States, *Evenwell v. Abbott*
- 2016-2017 *Perez v. Abbott*, U. S. District Court in the Western District of Texas (No. 5:11-cv-00360). Exert witness on behalf of Rodriguez intervenors.

**NOTICE OF MOTION BY RESPONDENTS, GOVERNOR KATHY HOCHUL AND
LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN,
FOR AN ORDER TO DISMISS, DATED FEBRUARY 24, 2022 [898 - 899]**

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM

NYSCEF DOC. NO. 75

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioner,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

Index No. E2022-0116CV

McAllister, J.S.C.

Return Date:
March 3, 2022

**NOTICE OF MOTION
TO DISMISS**

PLEASE TAKE NOTICE that upon the February 7, 2022 Order to Show Cause, the Petition, and all supporting papers in this matter, the Affirmation of Heather L. McKay, sworn to February 24, 2022, with accompanying Exhibits 1-5, and the Memorandum of Law in Opposition to the Petition and in Support of the Motion to Dismiss by the respondents, Governor Kathy Hochul and Lieutenant Governor and President of the Senate Brian A. Benjamin (collectively, "Executive Respondents"), the Executive Respondents, will move this Court on the 3rd day of March, 2022,¹ at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order dismissing this Petition and all claims against them pursuant to CPLR §§ 3211(a)(7) & (8), and declaring that L.2021, c. 633, § 1 and the 2022 Congressional maps are constitutional, and

¹ The return date of this motion is set to the agreed upon adjourned date of the return date in this proceeding pursuant to CPLR § 406.

for such other and further relief as this Court deems just and proper.

DATED: Rochester, New York
February 24, 2022

LETITIA JAMES
Attorney General State of New York
Attorney for Executive Respondents

BY:
/s/ Heather L. McKay
HEATHER L. MCKAY
Assistant Attorney General, of Counsel
144 Exchange Blvd., Suite 200
Rochester, New York 14614
(585) 546-7430
Heather.mckay@ag.ny.gov

To: Misha Tseytlin,
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
Telephone: (608) 999-1240
Email: mish.tseytlin@troutman.com
Attorneys for Petitioners
Via NYSCEF

AFFIRMATION OF HEATHER MCKAY, FOR RESPONDENTS, GOVERNOR KATHY HOCHUL AND LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN, IN OPPOSITION TO THE PETITION AND IN SUPPORT OF MOTION TO DISMISS, DATED FEBRUARY 24, 2022 [900 - 904]

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM
NYSCEF DOC. NO. 76

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/24/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioner,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

AFFIRMATION

Index No. E2022-0116CV

McAllister, J.S.C.

Return Date:
March 3, 2022

HEATHER MCKAY, an attorney duly licensed to practice law in the courts of the State of New York, affirms as follows under penalty of perjury:

1. I am an Assistant Attorney General in the Office of LETITIA JAMES, Attorney General of the State of New York, and am fully familiar with this case based upon personal knowledge and review of the file. I make this affirmation in opposition to the Petition and in support of the Motion to Dismiss by the respondents, Kathy Hochul, in her official capacity as Governor of the State of New York, and Brian A. Benjamin, in his official capacity as Lieutenant Governor and President of the Senate (collectively, "Executive Respondents").

2. On February 3, 2022, the Petition, proposed Order to Show Cause, and other supporting papers were uploaded to NYSCEF as Document Nos. 1-10.

3. On February 7, 2022, the Court signed the Order to Show Cause ("First OTSC").

NYSCEF 11.

4. On February 8, 2022, Petitioners purported to serve the Petition and First OTSC on the Governor and Lt. Governor. NYSCEF 56 & 57.

5. On February 10, 2022, Petitioners purported to complete service on the Governor and Lt. Governor by serving the Petition and First OTSC on the Office of the New York State Attorney General located at 28 Liberty Street, 16th Fl., New York, NY10005. NYSCEF 62.

6. CPLR §2214(d) requires service be made at the office of the Attorney General nearest to where the action is venued.

7. There is no Office of the Attorney General located in Steuben County, the venue chosen by Petitioners for this special proceeding. Upon information and belief, the New York City Office is approximately 289.4 miles away, whereas the Rochester Regional Office is the closest OAG Office to the Court, located approximately 81.1 miles away.

8. Petitioners have thus failed to serve the papers in the venue county or at the nearest reasonably close Attorney General's Office.

9. By email from Misha Tsyetlin, Esq., counsel for Petitioners, to various parties, including Executive Respondents' counsel, dated February 10, 2022, it was proposed that "[a]ll parties agree to accept email service of all documents not filed through NYSCEF, including the two Orders to Show Cause already entered and supporting papers." A copy of the email correspondent is attached hereto as **Exhibit 1**.

10. It is unclear what is meant by "service of all documents **not** filed through NYSCEF, including the two Orders to Show Cause already entered" (emphasis added).

11. On February 11, 2022, Eric Hecker, Esq., counsel for the respondent Senate Majority Leader, responded via email that "[r]egarding email service, we consent." Attorneys for

the Governor and Lt. Governor did not respond to this email exchange.

12. Regardless, a copy of the Petition and First OTSC were not thereafter served via email on counsel for the Governor or Lt. Governor.

13. Thus, even if the email exchange between Mr. Hecker and Mr. Tsyetlin could be interpreted as the Executive Respondents agreeing to service of the Petition and First OTSC by email, such service was never completed because the First OTSC was not served via email, or any other means, upon them.

14. Attached hereto and made a part hereof as **Exhibit 2** is a copy of the 2021 Legislation, signed into law on November 24, 2021.

15. Attached hereto and made a part hereof as **Exhibit 3** is a copy of the Board of Elections' publication describing the New York State Ballot proposals from November 2021.

16. Attached hereto and made a part hereof as **Exhibit 4** is the New York Times article regarding an interview of Governor Kathy Hochul, published on August 24, 2021, referenced in Petitioners' Petition.

17. Attached hereto and made a part hereof as **Exhibit 5** is the Governor's Approval Memoranda accompanying her approval of the 2022 Congressional maps.

18. As explained in the accompanying Memorandum of Law, the Executive Respondents should be dismissed from this special proceeding.

WHEREFORE, it is respectfully requested that the Executive Respondents' Motion to Dismiss be granted in its entirety, the Executive Respondents be dismissed from this case, and/or the Petition dismissed in its entirety and a declaration issued confirming that the 2021 Legislation and 2022 Congressional maps are constitutional, and for such other and further relief as this Court deems just and proper.

DATED: Rochester, New York
February 24, 2022

LETITIA JAMES
Attorney General
State of New York
Attorney for Executive Respondents

/s/ Heather L. McKay
HEATHER L. MCKAY
Assistant Attorney General
144 Exchange Blvd., Suite 200
Rochester, New York 14614
Telephone: (585) 546-7430
Heather.mckay@ag.ny.gov

To: Misha Tseytlin,
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
Telephone: (608) 999-1240
Email: mish.tseytlin@troutman.com
Attorneys for Petitioners
Via NYSCEF

CERTIFICATION

In accordance with Rule 202.8-b of the Uniform Rules of Supreme and County Courts, the undersigned certifies that the word count in this Affirmation of Heather McKay (excluding the caption, table of contents, table of authorities, signature block, and this certification), as established using the word count on the word-processing system used to prepare it, is 717 words of the 7,000 word limit.

Dated: February 24, 2022
Rochester, NY

/s Heather L. McKay
By: Heather L. McKay
Assistant Attorney General

EXHIBIT 1 TO MCKAY AFFIRMATION -
EMAILS, DATED FEBRUARY 11, 2022 [905 - 911]**FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM**

NYSCEF DOC. NO. 77

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

From: [Tseytlin, Misha](#)
To: [Eric Hecker](#); [Moskowitz, Bennet J.](#); [Dutton, Sean T.H.](#); [George H. Winner Jr.](#)
Cc: [John Cuti](#); [Alex Goldenberg](#); [Alice Reiter](#); [Chill, C. Daniel](#); [Reich, Elaine](#); [O'Brien, Ted](#); [McKay, Heather](#); [Halliyadde, Muditha](#)
Subject: RE: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)
Date: Friday, February 11, 2022 12:30:15 PM

[EXTERNAL]

Hello Eric,

In the spirit of compromise, and without agreeing with any of your statements below, we accept your proposal that Petitioners serve their principal brief and expert reports by Monday, in which case Respondents will not move to strike the brief or reports. We also accept your proposal that the parties each stipulate to a 10,000 word limit for their respective principal briefs, and Petitioners get 5,000 words for our reply. And we are glad to be in agreement on e-mail service.

We are carefully considering the other matters discussed in your email below.

Best,

Misha Tseytlin

Partner

[troutman pepper](#)

Direct: 312.759.5947 | Mobile: 608.999.1240 | Internal: 20-5947

misha.tseytlin@troutman.com

From: Eric Hecker <ehecker@chwllp.com>
Sent: Friday, February 11, 2022 10:42 AM
To: Tseytlin, Misha <Misha.Tseytlin@troutman.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Dutton, Sean T.H. <Sean.Dutton@troutman.com>; George H. Winner Jr. <gwinner@kmw-law.com>
Cc: John Cuti <jcuti@chwllp.com>; Alex Goldenberg <agoldenberg@chwllp.com>; Alice Reiter <areiter@chwllp.com>; Chill, C. Daniel <DChill@graubard.com>; Reich, Elaine <EReich@graubard.com>; O'Brien, Ted <Ted.O'Brien@ag.ny.gov>; McKay, Heather <Heather.McKay@ag.ny.gov>; Halliyadde, Muditha <Muditha.Halliyadde@ag.ny.gov>
Subject: Re: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

EXTERNAL SENDER

Misha, I am following up on our one-on-one telephone conversation earlier. When you called me directly, I took your call, and I told you that I had no issue speaking with you informally on a one-on-one basis, but that other than providing you with off-the-cuff reactions to the issues you raised, I could not agree to anything before you first put your suggestions in writing for consideration by counsel for all Respondents. You indicated that you would do that, and we look forward to hearing

from you in writing at your earliest convenience.

Eric Hecker
Cuti Hecker Wang LLP
305 Broadway, Suite 607
New York, New York 10007

Tel: 212.620.2600 | Fax: 212.620.2612

Email: hecker@chwllp.com

Pronouns: he/him/his

From: Eric Hecker <hecker@chwllp.com>
Date: Friday, February 11, 2022 at 10:26 AM
To: "Tseytlin, Misha" <Misha.Tseytlin@troutman.com>, "Moskowitz, Bennet J." <Bennet.Moskowitz@troutman.com>, "Dutton, Sean T.H." <Sean.Dutton@troutman.com>, "George H. Winner Jr." <gwinner@kmw-law.com>
Cc: John Cuti <jcuti@chwllp.com>, Alex Goldenberg <agoldenberg@chwllp.com>, Alice Reiter <areiter@chwllp.com>, "Chill, C. Daniel" <DChill@graubard.com>, "Reich, Elaine" <EReich@graubard.com>, "O'Brien, Ted" <Ted.O'Brien@ag.ny.gov>, "McKay, Heather" <Heather.McKay@ag.ny.gov>, "Halliyadde, Muditha" <Muditha.Halliyadde@ag.ny.gov>
Subject: Re: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

Misha,

We have carefully reviewed your email with our clients and with counsel for the Assembly and the Attorney General, and we submit this joint response.

We begin by reiterating that we will continue to reach compromises wherever feasible. However, we were surprised by the positions you have taken, many of which we believe are untenable.

Regarding the petition signature deadline, having now consulted with our clients, we have concluded that our clients do not have the authority to stipulate to what would amount to an amendment of duly enacted statutes, so we do not believe that we can push the deadlines back by stipulation.

Regarding the case schedule, all parties agreed during the meet and confer teleconference that Respondents' papers in opposition to the two pending orders to show cause are due on February 24. We hope to be able to meet that deadline, but our ability to do that will hinge on when you serve your expert reports and brief. For the record, our position is that it was improper for you to commence this special proceeding without filing and serving any expert reports or a brief with your petition, and that by failing to do so, you have waived your right to do so. Indeed, we do not read either of the orders to show cause to permit you to serve additional papers in support of either the Petition or your pending motion. With that said, if you will serve your expert reports by Monday,

February 14, we will not move to strike them. Especially given the highly complex nature of the statistical issues we are assuming you will attempt to raise, it would be impractical for us to be able to submit rebuttal expert reports by February 24 without having at least ten days to review and respond to your expert reports. We see no reason why you should need any additional time, much less time past Monday, to serve your brief (which you did not file with your petition as is customary, or seek leave to file or even mention in either of your proposed orders to show cause). So long as you serve your expert reports and brief no later than Monday, February 14, we see no reason to adjourn the current March 3 return date for the Petition and the pending motion.

Regarding discovery, we are surprised by the breadth and depth of the discovery you are seeking in this special proceeding, in which discovery is disfavored and available only by leave of the Court. With respect to your question about where and how the documents you are seeking are maintained, you purportedly are seeking every single document that was relevant to or considered by anyone in connection with the redistricting process, so the answer is that those documents are maintained in the electronic and/or paper files of every person who was involved in the redistricting process in any way. If you would like to provide us with proposed demands, we will review them and continue this discussion in good faith, but our position is that you currently do not have leave to obtain discovery and that the Court should not grant you such leave. Our reasons for that position – including, without limitation, the overbreadth of what you are seeking, and the impossibility of gathering and reviewing documents, creating a privilege log, briefing the weighty legislative and attorney-client privilege issues that would be raised, submitting documents that are claimed to be privileged for an in camera review, and exhausting any appeals that may be necessary in the next two weeks – are beyond the scope of this response, and we reserve all of our rights with respect to opposing any discovery you may seek leave to conduct. But again, we of course will continue our discussions with you to see if any common ground can be identified.

Regarding your motion to amend, we do not consent to the filing of your amended petition. Our position is, among other things, that allowing you to greatly expand the scope of this proceeding, with no realistic hope of obtaining a final judgment and completing any appeals that may be necessary anytime soon, would be unduly prejudicial to the election process, and also that it would be unduly prejudicial for Respondents to have to address expert reports regarding two reapportionment plans on such a compressed schedule.

Regarding email service, we consent.

Regarding brief length, as set forth above, our position is that you have waived your right to submit an opening brief. If you serve your brief by Monday February 14, we will not move to strike it, and we would consent to 10,000 words, provided that you likewise consent to the same for Respondents. We believe that the 4,200 words provided for in Rule 202.8-b is sufficient for your reply brief, but we would consent to 5,000 words as a courtesy.

If you prefer to respond to the above by email, of course feel free to do so. If you would prefer to resume our discussions by telephone, we will make ourselves available at the soonest time that is convenient for all counsel. We look forward to continuing to work with you constructively to narrow any areas of disagreement to the greatest extent possible.

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM

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INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/24/2022

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305 Broadway, Suite 607
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Pronouns: he/him/his

From: "Tseytlin, Misha" <Misha.Tseytlin@troutman.com>
Date: Thursday, February 10, 2022 at 4:58 PM
To: Eric Hecker <hecker@chwllp.com>, John Cuti <jcuti@chwllp.com>, Alex Goldenberg <agoldenberg@chwllp.com>, Alice Reiter <areiter@chwllp.com>, "Chill, C. Daniel" <DChill@graubard.com>, "Reich, Elaine" <EReich@graubard.com>, "O'Brien, Ted" <Ted.O'Brien@ag.ny.gov>, "McKay, Heather" <Heather.McKay@ag.ny.gov>, "Halliyadde, Muditha" <Muditha.Halliyadde@ag.ny.gov>
Cc: "Moskowitz, Bennet J." <Bennet.Moskowitz@troutman.com>, "George H. Winner Jr." <gwinner@kmw-law.com>, "Dutton, Sean T.H." <Sean.Dutton@troutman.com>
Subject: RE: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

Counsel,

Thank you for taking the time to speak with us earlier today. Given the forthcoming March 1, 2022 deadline for candidates to start collecting signatures for petitions, we greatly appreciate that you all made time to speak about these important issues. We reiterate that we appreciate your professionalism and desire – which we share – to reach compromises wherever feasible.

Per your request, we are providing the following draft proposal to facilitate the parties' ongoing discussions regarding the case schedule and related matters. As discussed, we understand no party is committing to a particular path unless and until an agreement is formalized (i.e., the list below is for discussion only).

Eric: You had mentioned some concerns you had about potential undue burdens related to discovery requests. We have no desire to unduly burden anyone. To enable us to address your concerns, we ask that you please share with us where and how the documents referenced below are maintained, so we can consider ways to reduce any potential burdens.

Moving March 1 Petition Signature Deadline

- Parties agree to the Court entering an order pushing back the period for candidates to collect signatures for petitions, N.Y. Election Law § 6-134(4); N.Y. Election Law § 6-158(1), by one week, so that this period now would start on March 8, and end on April 11-14.

Proposed Case Schedule (Working Backwards And Assuming Petition Signature Date Moved to March 8)

- Parties agree that scheduling applies to all issues in the Amended Petition (i.e., both Senate and congressional districts), so as to avoid separate or serial briefing.
- Petitioners' Expert Reports: February 15, 2022.
- Petitioners' Opening Brief: February 17, 2022.
- Respondents' Response And Expert Reports: February 24, 2022 (if return date remains March 3) or February 28, 2022 (if Court moves return date to March 7, 2022).
- Petitioners' Reply with any Reply Expert Reports due: March 2, 2022 (if return date remains March 3) or March 6, 2022 (if Court moves return date to March 7, 2022).
- Return date: March 3, 2022 or March 7, 2022, based upon what the Court decides.

Discovery (Without prejudice to any Party's right to seek leave to serve additional discovery requests as appropriate)

- Petitioners' Discovery Requests
 - Depositions
 - IRC (Subpoena)
 - Elaine Frazier
 - John Flateau
 - Ivelisse Cuevas-Molina
 - David Imamura
 - Eugene Bengner
 - Respondents
 - Governor Hochul
 - Senate Majority Leader Andrea Stewart-Cousins
 - Speaker Carl Heastie
 - LATFOR
 - Eric Katz (Counsel to NY Senate Office of Majority Counsel)
 - Phil Chonigman (Co-Executive Director)
 - Assemblymember Kenneth Zebrowski
 - Senator Mike Gianaris
 - Request for documents to Respondents seeking:
 - Documents concerning Respondents' contacts with IRC Commissioners Frazier, Flateau, Cuevas-Molinas, Imamura, and Bengner.
 - Communications concerning the IRC's work, which Respondents received from third parties.
 - Any other documents and communications relevant to and considered by Respondents in the process of New York's redistricting of Congressional and state Senate districts in the current decennial.
- Petitioners would serve their discovery requests tomorrow, February 11.
- Parties to stipulate to expedited response deadlines for stipulated discovery requests, with the goal of having discovery completed by February 24. This is without prejudice to any party raising any objections it may have with any discovery request.

Stipulate to amended petition.

- Respondents to stipulate to Petitioners' leave to file the Amended Petition, thereby relieving all parties of having to devote further resources to Petitioners' pending Motion for Leave to Amend.

Email Service

All parties agree to accept email service of all documents not filed through NYSCEF, including the two Orders to Show Cause already entered and supporting papers.

Word Limits on Briefs

- All parties agree to double the word limits from those found in Rule 202.8-b of the Uniform Civil Rules for the Supreme Court and the County Court.
 - Memoranda of Law in Chief: 14,000 words
 - Reply Memoranda: 8,400 words.

Best,

Misha Tseytlin

Partner

troutman pepper

Direct: 312.759.5947 | Mobile: 608.999.1240 | Internal: 20-5947

misha.tseytlin@troutman.com

From: Eric Hecker <hecker@chwillp.com>

Sent: Wednesday, February 9, 2022 5:13 PM

To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; George H. Winner Jr. <gwinner@kmw-law.com>; Tseytlin, Misha <Misha.Tseytlin@troutman.com>

Cc: John Cuti <jcuti@chwillp.com>; Alex Goldenberg <agoldenberg@chwillp.com>; Alice Reiter <areiter@chwillp.com>; Chill, C. Daniel <DChill@graubard.com>; Reich, Elaine <EReich@graubard.com>; O'Brien, Ted <Ted.O'Brien@ag.ny.gov>; McKay, Heather <Heather.McKay@ag.ny.gov>; Halliyadde, Muditha <Muditha.Halliyadde@ag.ny.gov>

Subject: Re: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

EXTERNAL SENDER

Thank you for reaching out. I am copying my colleagues, counsel for the Assembly, and attorneys with the Attorney General's office, which may or may not represent certain Respondents. We have conferred about our respective schedules and are available at noon tomorrow if that works for you.

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Pronouns: he/him/his

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM

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RECEIVED NYSCEF: 02/24/2022

From: "Moskowitz, Bennet J." <Bennet.Moskowitz@troutman.com>
Date: Wednesday, February 9, 2022 at 4:17 PM
To: Eric Hecker <ehecker@chwillp.com>
Cc: "George H. Winner Jr." <gwinner@kmw-law.com>, "Tseytlin, Misha" <Misha.Tseytlin@troutman.com>
Subject: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

Mr. Hecker,

We represent Petitioners in the referenced matter. We would like to meet and confer with you about the case schedule at your earliest convenience. What is your availability tomorrow?

Sincerely,
Bennet

Bennet J. Moskowitz*

Partner

Direct: 212.704.6087 | Internal: 13-6087

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EXHIBIT 2 TO MCKAY AFFIRMATION -
LEGISLATION [912 - 913]

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STATE OF NEW YORK

7150

2021-2022 Regular Sessions

IN SENATE

June 2, 2021

Introduced by Sen. GIANARIS -- read twice and ordered printed, and when printed to be committed to the Committee on Rules

AN ACT to amend chapter 17 of the laws of 2012 amending the legislative law relating to redistricting of congressional, senate and assembly districts, in relation to the submission of a plan for redistricting of congressional, senate and assembly districts

The People of the State of New York, represented in Senate and Assembly, do enact as follows:

1 Section 1. Section 4 of chapter 17 of the laws of 2012 amending the
2 legislative law relating to redistricting of congressional, senate and
3 assembly districts, is amended to read as follows:
4 § 4. (a) The independent redistricting commission established pursuant
5 to section 5-b of article 3 of the constitution shall submit to the
6 legislature such plan and the implementing legislation therefore on or
7 before January first or as soon as practicable thereafter but no later
8 than January fifteenth in the year ending in two beginning in two thou-
9 sand twenty-two. Within ten days of the plan's submission or within ten
10 days after January first in a year ending in two, whichever is later,
11 the implementing legislation shall be voted upon without amendment by
12 the senate or the assembly. If approved by the first house voting upon
13 it, such legislation shall be delivered to the other house immediately
14 to be voted upon, without amendment, within five days from delivery. If
15 approved by both houses such legislation shall be presented to the
16 governor for action within three days. If the commission does not vote
17 on any redistricting plan or plans, for any reason, by the date required
18 for submission of such plan, the commission shall submit to the legisla-
19 ture all plans in its possession, both completed and in draft form, and
20 the data upon which such plans are based.
21 (b) If either house shall fail to approve the legislation implementing
22 the first redistricting plan, or the governor shall veto such legis-
23 lation and the legislature shall fail to override such veto within ten

EXPLANATION--Matter in *italics* (underscored) is new; matter in brackets
[-] is old law to be omitted.

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1 days of such veto, each house or the governor, if he or she vetoes it,
2 shall notify the commission that such legislation has been disapproved
3 within three days of such disapproval. Within fifteen days of such
4 notification and in no case later than February twenty-eighth of a year
5 ending in two, the redistricting commission shall prepare and submit to
6 the legislature a second redistricting plan and the necessary implement-
7 ing legislation for such plan. Within ten days of its submission such
8 legislation shall be voted upon, without amendment, by the senate or
9 assembly and, if approved by the first house voting upon it, such legis-
10 lation shall be delivered to the other house immediately to be voted
11 upon without amendment, within five days from delivery. If approved by
12 both houses, such legislation shall be presented to the governor for
13 action within three days.

14 (c) If either house shall fail to approve the legislation implementing
15 the second redistricting plan, or the governor shall veto such legis-
16 lation and the legislature shall fail to override such veto within ten
17 days of such veto, or if the commission does not vote on any redistrict-
18 ing plan or plans, for any reason, by the date required for submission
19 of such plan and the commission submitted to the legislature pursuant to
20 subdivision (a) of this section all plans in its possession, both
21 completed and in draft form, and the data upon which such plans are
22 based, each house shall introduce such implementing legislation with any
23 amendments each house deems necessary. If approved by both houses, such
24 legislation shall be presented to the governor for action within three
25 days.

26 § 2. This act shall take effect immediately.

EXHIBIT 3 TO MCKAY AFFIRMATION - 2021 STATEWIDE BALLOT PROPOSALS [914 - 924]

2021 Statewide Ballot Proposals | New York State Board of Elections | <http://www.elections.ny.gov/2021-Ballot-Proposals.html>

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2021 Statewide Ballot Proposals

(There may be additional local ballot proposals in your area, please check with your county Board of Elections for more information.)

Ballot Proposal 1:

FORM OF SUBMISSION OF PROPOSAL NUMBER ONE, AN AMENDMENT Amending the Apportionment and Redistricting Process

This proposed constitutional amendment would freeze the number of state senators at 63, amend the process for the counting of the state's population, delete certain provisions that violate the United States Constitution, repeal and amend certain requirements for the appointment of the co-executive directors of the redistricting commission and amend the manner of drawing district lines for congressional and state legislative offices. Shall the proposed amendment be approved?

ABSTRACT OF PROPOSAL NUMBER ONE, AN AMENDMENT Amending the Apportionment and Redistricting Process

The purpose of this proposal is to amend the portions of Article III of the New York Constitution that relate to the way district lines for congressional and state legislative offices are determined.

The proposal would do the following:

- Amend and repeal portions of the state constitutional amendment adopted by voters in 2014 that created a redistricting commission.
- Allow the redistricting commission to appoint two co-executive directors by simple majority vote, without consideration as to the party affiliation of the individual being appointed. Furthermore, this amendment would eliminate the alternative process currently in place that allows for the appointment of co-executive directors and co-deputy executive directors by the legislature should the redistricting commission fail to appoint co-executive directors, and remove the requirement that the two co-executive directors of the redistricting commission be members of different political parties.
- Freeze the number of state senators at the current number of 63. Currently, under the state constitution, the number of senators was originally set at 50 and thereafter increased over time to 63.
- Require that state assembly and senate district lines be based on the total population of the state, and require the state to count all residents, including non-citizens and Native Americans if the federal census fails to include them.
- Provide for incarcerated people to be counted at their place of last residence, instead of at their place of incarceration, for the purpose of redistricting. This practice is already established by state statute for Senate and Assembly districts.
- Revise the procedure for drawing and approving Congressional and state legislative districts scheduled to be first applied in 2022. The proposed amendment would alter the redistricting procedure in the following ways:
 - Change the redistricting map approval procedures for the redistricting commission and legislature by making changes to the voting thresholds needed to approve/adopt a plan. Under this proposal:
 - Approval of a plan by the redistricting commission would require at least seven votes, out of the ten commissioners, in favor thereof. There would no longer be a requirement that at least one commissioner appointed by each of the legislative leaders vote in favor of a plan in order to approve it. A plan approved by at least seven commissioners must be approved by a majority of each house of the legislature to be approved.
 - However, in the event that the redistricting commission votes on but does not have the seven votes needed to approve a plan, the commission is required to send the legislature the redistricting plan or plans that garnered the most votes. The legislature would be able to adopt such plan with a 60% majority. This amendment would repeal the requirement that in the event the speaker of the assembly and the temporary president of the senate are members of the same political party, approval shall require the vote in support of it's passage by at least two thirds of the members elected in each house. If the commission fails to vote on any plan or plans by the deadline, all plans, including draft plans in the commission's possession are sent to the legislature, and each house of the legislature can introduce and adopt such a plan with or without amendments.
 - The redistricting commission voting requirements and legislative vote thresholds for approving the commission's plan would no longer vary depending on the political affiliation of the Temporary President of the Senate and the Speaker of the Assembly.
 - Require the redistricting commission that draws the lines to submit its redistricting plan and implementing legislation to the Legislature two months earlier than called for under the current procedure the timeline set forth in the 2014 state constitutional amendment. (For the redistricting cycle due to proceed in 2022, the time frame would be condensed to meet election-related deadlines).
- Remove certain restrictions on how Senate district lines are drawn, including the "block on border" rule that require placing of blocks on the border of districts in certain districts.
- Delete certain provisions that the United States Supreme Court has deemed unconstitutional.

**TEXT OF PROPOSAL NUMBER ONE, AN AMENDMENT
CONCURRENT RESOLUTION OF THE SENATE AND ASSEMBLY**

proposing an amendment to sections 2, 4, 5, 5-a and 5-b of article III of the constitution, in relation to the number of state senators and inclusion of incarcerated persons in the federal census for population determination for redistricting purposes and to the functioning of the independent redistricting commission in the determination of district lines for congressional and state legislative

offices; and to repeal section 3 of article 3 of the constitution relating thereto

Section 1. Resolved (if the Assembly concur), That section 2 of article III of the constitution be amended to read as follows:

§ 2. The senate shall consist of ~~[fifty]~~ sixty-three members [, except as hereinafter provided]. The senators elected in the year one thousand eight hundred and ninety-five shall hold their offices for three years, and their successors shall be chosen for two years. The assembly shall consist of one hundred and fifty members. The assembly members elected in the year one thousand nine hundred and thirty-eight, and their successors, shall be chosen for two years.

§ 2. Resolved (if the Assembly concur), That section 3 of article III of the constitution be REPEALED.

§ 3. Resolved (if the Assembly concur), That section 4 of article III of the constitution be amended to read as follows:

§ 4. (a) Except as herein otherwise provided, the federal census taken in the year nineteen hundred thirty and each federal census taken decennially thereafter shall be controlling as to the number of inhabitants in the state or any part thereof for the purposes of the apportionment of members of assembly and readjustment or alteration of senate and assembly districts next occurring, in so far as such census and the tabulation thereof purport to give the information necessary therefor. The legislature, by law, shall provide for the making and tabulation by state authorities of an enumeration of the inhabitants of the entire state to be used for such purposes, instead of a federal census, if the taking of a federal census in any tenth year from the year nineteen hundred thirty be omitted or if the federal census fails to show the total number of inhabitants of the entire state, including the number of aliens [or] and Indians not taxed. If a federal census, though giving the requisite information as to the state at large, fails to give the information as to any civil or territorial divisions which is required to be known for such purposes, the legislature, by law, shall provide for such an enumeration of the inhabitants of such parts of the state only as may be necessary, which shall supersede in part the federal census and be used in connection therewith for such purposes. If a federal census fails to provide enumeration and identification of incarcerated persons, the appropriate state entities shall provide information sufficient to re-enumerate incarcerated persons to their place of last residence for the purposes of drawing district lines, no later than September first of any year ending in one. The legislature, by law, may provide in its discretion for an enumeration by state authorities of the inhabitants of the state, to be used for such purposes, in place of a federal census, when the return of a decennial federal census is delayed so that it is not available at the beginning of the regular session of the legislature in the second year after the year nineteen hundred thirty or after any tenth year therefrom, or if an apportionment of members of assembly and readjustment or alteration of senate districts is not made at or before such a session. At the regular session in the year nineteen hundred thirty-two, and at the first regular session after the year nineteen hundred forty and after each tenth year therefrom the senate districts shall be readjusted or altered, but if, in any decade, counting from and including that which begins with the year nineteen hundred thirty-one, such a readjustment or alteration is not made at the time above prescribed, it shall be made at a subsequent session occurring not later than the sixth year of such decade, meaning not later than nineteen hundred thirty-six, nineteen hundred forty-six, nineteen hundred fifty-six, and so on; provided, however, that if such districts shall have been readjusted or altered by law in either of the years nineteen hundred thirty or nineteen hundred thirty-one, they shall remain unaltered until the first regular session after the year nineteen hundred forty. No town, except a town having more than a full ratio of apportionment [, and no block in a city inclosed by streets or public ways,] shall be divided in the formation of senate districts. [In the reapportionment of senate districts, no district shall contain a greater excess in population over an adjoining district in the same county, than the population of a town or block therein adjoining such district. Counties, towns or blocks which, from their location, may be included in either of two districts, shall be so placed as to make said districts most nearly equal in number of inhabitants, excluding aliens.

No county shall have four or more senators unless it shall have a full ratio for each senator.] No county shall have more than one-third of all the senators; and no two counties or the territory thereof as now organized, which are adjoining counties, or which are separated only by public waters, shall have more than one-half of all the senators.

(b) The independent redistricting commission established pursuant to section five-b of this article shall prepare a redistricting plan to establish senate, assembly, and congressional districts every ten years commencing in two thousand twenty-one, and shall submit to the legislature such plan and the implementing legislation therefor on or before [January] November first or as soon as practicable thereafter but no later than [January] November fifteenth in the year ending in [two beginning in two thousand twenty-two] one. The redistricting plans for the assembly and the senate shall be contained in and voted upon by the legislature in a single bill, and the congressional district plan may be included in the same bill if the legislature chooses to do so. The implementing legislation shall be voted upon, without amendment, by the senate or the assembly and if approved by the first house voting upon it, such legislation shall be delivered to the other house immediately to be voted upon

without amendment. If approved by both houses, such legislation shall be presented to the governor for action. If either house shall fail to approve the legislation implementing the first redistricting plan, or the governor shall veto such legislation and the legislature shall fail to override such veto, each house or the governor if he or she vetoes it, shall notify the commission that such legislation has been disapproved. Within fifteen days of such notification and in no case later than [February twenty-eighth] January first, the redistricting commission shall prepare and submit to the legislature a second redistricting plan and the necessary implementing legislation for such plan. Such legislation shall be voted upon, without amendment, by the senate or the assembly and, if approved by the first house voting upon it, such legislation shall be delivered to the other house immediately to be voted upon without amendment. If approved by both houses, such legislation shall be presented to the governor for action. In the year two thousand twenty-two only, the commission shall submit to the legislature a first redistricting plan no later than January first, two thousand twenty-two. If either house shall fail to approve the legislation implementing the first redistricting plan, or the governor shall veto such legislation and the legislature shall fail to override such veto, each house or the governor if he or she vetoes it, shall promptly notify the commission that such legislation has been disapproved. No later than January fifteen, two thousand twenty-two, the redistricting commission shall prepare and submit to the legislature a second redistricting plan and the necessary implementing legislation for such plan. Such legislation shall be voted upon, without amendment, by the senate or the assembly and, if approved by the first house voting upon it, such legislation shall be delivered to the other house immediately to be voted upon without amendment. If approved by both houses, such legislation shall be presented to the governor for action.

If either house shall fail to approve the legislation implementing the second redistricting plan, or the governor shall veto such legislation and the legislature shall fail to override such veto, or the redistricting commission fails to vote on a redistricting plan and implementing by the required deadline and makes a submission to the legislature pursuant to subdivision (g-1) of section five-b of this article, each house shall introduce such implementing legislation with any amendments each house of the legislature deems necessary. All such shall comply with the provisions of this article. If approved by both houses, such legislation shall be presented to the governor for action.

All votes by the senate or assembly on any redistricting plan legislation pursuant to this article shall be conducted in accordance with the following rules:

(1) [In the event that the speaker of the assembly and the temporary president of the senate are members of two different political parties, approval] Approval of legislation submitted by the independent redistricting commission pursuant to subdivision (f) of section five-b of this article shall require the vote in support of its passage by at least a majority of the members elected to each house.

(2) [In the event that the speaker of the assembly and the temporary president of the senate are members of two different political parties, approval] Approval of legislation submitted by the independent redistricting commission pursuant to subdivision (g) of section five-b of this article shall require the vote in support of its passage by at least sixty percent of the members elected to each house.

[(3) In the event that the speaker of the assembly and the temporary president of the senate are members of the same political party, approval of legislation submitted by the independent redistricting commission pursuant to subdivision (f) or (g) of section five-b of this article shall require the vote in support of its passage by at least two-thirds of the members elected to each house.]

(c) Subject to the requirements of the federal constitution and statutes and in compliance with state constitutional requirements, the following principles shall be used in the creation of state senate and state assembly districts and congressional districts:

(1) When drawing district lines, the commission shall consider whether such lines would result in the denial or abridgement of racial or language minority voting rights, and districts shall not be drawn to have the purpose of, nor shall they result in, the denial or abridgement of such rights. Districts shall be drawn so that, based on the totality the circumstances, racial or minority language groups do not have less opportunity to participate in the political process than other members of the electorate and to elect representatives of their choice.

(2) To the extent practicable, districts shall contain as nearly as may be an equal number of inhabitants. For each district that deviates from this requirement, the commission shall provide a specific public explanation as to why such deviation exists.

(3) Each district shall consist of contiguous territory.

(4) Each district shall be as compact in form as practicable.

(5) Districts shall not be drawn to discourage competition or for the purpose of favoring or disfavoring incumbents or other particular candidates or political parties. The commission shall consider the

maintenance of cores of existing districts, of pre-existing political subdivisions, including counties, cities, and towns, and of communities of interest.

(6) [In drawing senate districts, towns or blocks which, from their location may be included in either of two districts, shall be so placed as to make said districts most nearly equal in number of inhabitants. The requirements that senate districts not divide counties or towns, as well as the 'block-on-border' and 'town-on-border' rules, shall remain in effect] To the extent practicable, all incarcerated persons shall be re-numerated to their place of last residence for the purposes of drawing district lines.

During the preparation of the redistricting plan, the independent redistricting commission shall conduct not less than one public hearing on proposals for the redistricting of congressional and state legislative districts in each of the following (i) cities: Albany, Buffalo, Syracuse, Rochester, and White Plains; and (ii) counties: Bronx, Kings, New York, Queens, Richmond, Nassau, and Suffolk. Notice of all such hearings shall be widely published using the best available means and media a reasonable time before every hearing. At least thirty days prior to the first public hearing and in any event no later than September fifteenth of the year ending in one or as soon as practicable thereafter, the independent redistricting commission shall make widely available to the public, in print form and using the best available technology, its draft redistricting plans, relevant data, and related information. Such plans, data, and information shall be in a form that allows and facilitates their use by the public to review, analyze, and comment upon such plans and to develop alternative redistricting plans for presentation to the commission at the public hearings. The independent redistricting commission shall report the findings of all such hearings to the legislature upon submission of a redistricting plan.

(d) The ratio for apportioning senators shall always be obtained by dividing the number of inhabitants [, excluding aliens,] by [fifty] sixty-three, and the senate shall always be composed of [fifty] sixty-three members [, except that if any county having three or more senators at the time of any apportionment shall be entitled on such ratio to an additional senator or senators, such additional senator or senators shall be given to such county in addition to the fifty senators, and the whole number of senators shall be increased to that extent].

The senate districts, including the present ones, as existing immediately before the enactment of a law readjusting or altering the senate districts, shall continue to be the senate districts of the state until the expirations of the terms of the senators then in office, except for the purpose of an election of senators for full terms beginning at such expirations, and for the formation of assembly districts.

(e) The process for redistricting congressional and state legislative districts established by this section and sections five and five-b of this article shall govern redistricting in this state except to the extent that a court is required to order the adoption of, or changes to, a redistricting plan as a remedy for a violation of law.

A reapportionment plan and the districts contained in such plan shall be in force until the effective date of a plan based upon the subsequent federal decennial census taken in a year ending in zero unless modified pursuant to court order.

§ 4. Resolved (if the Assembly concur), That sections 5-a and 5-b of article III of the constitution be amended to read as follows:

[§ 5-a. For the purpose of apportioning senate and assembly districts pursuant to the foregoing provisions of this article, the term "inhabitants, excluding aliens" shall mean the whole number of persons.]

§ 5-b. (a) On or before February first of each year ending with a zero and at any other time a court orders that congressional or state legislative districts be amended, an independent redistricting commission shall be established to determine the district lines for congressional and state legislative offices. The independent redistricting commission shall be composed of ten members, appointed as follows:

- (1) two members shall be appointed by the temporary president of the senate;
- (2) two members shall be appointed by the speaker of the assembly;
- (3) two members shall be appointed by the minority leader of the senate;
- (4) two members shall be appointed by the minority leader of the assembly;
- (5) two members shall be appointed by the eight members appointed pursuant to paragraphs (1) through (4) of this subdivision by a vote of not less than five members in favor of such appointment, and these two members shall not have been enrolled in the preceding five years in either of the two political parties that contain the largest or second largest number of enrolled voters within the state;
- (6) one member shall be designated chair of the commission by a majority of the members appointed

pursuant to paragraphs (1) through (5) of this subdivision to convene and preside over each meeting of the commission.

(b) The members of the independent redistricting commission shall be registered voters in this state. No member shall within the last three years:

(1) be or have been a member of the New York state legislature or United States Congress or a statewide elected official;

(2) be or have been a state officer or employee or legislative employee as defined in section seventy-three of the public officers law;

(3) be or have been a registered lobbyist in New York state;

(4) be or have been a political party chairman, as defined in paragraph (k) of subdivision one of section seventy-three of the public officers law;

(5) be the spouse of a statewide elected official or of any member of the United States Congress, or of the state legislature.

(c) To the extent practicable, the members of the independent redistricting commission shall reflect the diversity of the residents of this state with regard to race, ethnicity, gender, language, and geographic residence and to the extent practicable the appointing authorities shall consult with organizations devoted to protecting the voting rights of minority and other voters concerning potential appointees to the commission.

(d) Vacancies in the membership of the commission shall be filled within thirty days in the manner provided for in the original appointments.

(e) The legislature shall provide by law for the compensation of the members of the independent redistricting commission, including compensation for actual and necessary expenses incurred in the performance of their duties.

(f) A minimum of five members of the independent redistricting commission shall constitute a quorum for the transaction of any business or the exercise of any power of such commission prior to the appointment of the two commission members appointed pursuant to paragraph (5) of subdivision (a) of this section, and a minimum of seven members shall constitute a quorum after such members have been appointed, and no exercise of any power of the independent redistricting commission shall occur without the affirmative vote of at least a majority of the members, provided that [, in order to approve any redistricting plan and implementing legislation, the following rules shall apply:

(1) In the event that the speaker of the assembly and the temporary president of the senate are members of the same political party, approval of a redistricting plan and implementing legislation by the commission for submission to the legislature shall require the vote in support of its approval by at least seven members including at least one member appointed by each of the legislative leaders.

(2) In the event that the speaker of the assembly and the temporary president of the senate are members of two different political parties, approval of a redistricting plan and implementing legislation by the commission for submission to the legislature shall require the vote in support of its approval by at least seven members [including at least one member appointed by the speaker of the assembly and one member appointed by the temporary president of the senate].

(g) In the event that the commission is unable to obtain seven votes to approve a redistricting plan on or before [January] November first in the year ending in [two] one or as soon as practicable thereafter, the commission shall submit to the legislature that redistricting plan and implementing legislation that garnered the highest number of votes in support of its approval by the commission with a record of the votes taken. In the event that more than one plan received the same number of votes for approval, and such number was higher than that for any other plan, then the commission shall submit all plans that obtained such number of votes. The legislature shall consider and vote upon such implementing legislation in accordance with the voting rules set forth in subdivision (b) of section four of this article.

(g-1) If the commission does not vote on any redistricting plan or plans, for any reason, by the date required for submission of such plan by this article, the commission shall submit to the legislature all plans in its possession, both completed and in draft form, and the data upon which such plans are based.

(h) (1) The independent redistricting commission shall appoint two co-executive directors by a majority vote of the commission [in accordance with the following procedure:

- (i) In the event that the speaker of the assembly and the temporary president of the senate are members of two different political parties, the co-executive directors shall be approved by a majority of the commission that includes at least one appointee by the speaker of the assembly and at least one appointee by the temporary president of the senate.
- (ii) In the event that the speaker of the assembly and the temporary president of the senate are members of the same political party, the co-executive directors shall be approved by a majority of the commission that includes at least one appointee by each of the legislative leaders].
- (2) [One of the co-executive directors shall be enrolled in the political party with the highest number of enrolled members in the state and one shall be enrolled in the political party with the second highest number of enrolled members in the state.] The co-executive directors shall appoint such staff as are necessary to perform the commission's duties, except that the commission shall review a staffing plan prepared and provided by the co-executive directors which shall contain a list of the various positions and the duties, qualifications, and salaries associated with each position.
- [(3) In the event that the commission is unable to appoint one or both of the co-executive directors within forty-five days of the establishment of a quorum of seven commissioners, the following procedure shall be followed:
- (i) In the event that the speaker of the assembly and the temporary president of the senate are members of two different political parties, within ten days the speaker's appointees on the commission shall appoint one co-executive director, and the temporary president's appointees on the commission shall appoint the other co-executive director. Also with-in ten days the minority leader of the assembly shall select a co-deputy executive director, and the minority leader of the senate shall select the other co-deputy executive director,
- (ii) In the event that the speaker of the assembly and the temporary president of the senate are members of the same political party, within ten days the speaker's and temporary president's appointees on the commission shall together appoint one co-executive director, and the two minority leaders' appointees on the commission shall together appoint the other co-executive director.
- (4) In the event of a vacancy in the offices of co-executive director or co-deputy executive director, the position shall be filled within ten days of its occurrence by the same appointing authority or authorities that appointed his or her predecessor.]
- (i) The state budget shall include necessary appropriations for the expenses of the independent redistricting commission, provide for compensation and reimbursement of expenses for the members and staff of the commission, assign to the commission any additional duties that the legislature may deem necessary to the performance of the duties stipulated in this article, and require other agencies and officials of the state of New York and its political subdivisions to provide such information and assistance as the commission may require to perform its duties.

§ 5. Resolved (if the Assembly concur), That section 5 of article III of the constitution be amended to read as follows:

§ 5. The members of the assembly shall be chosen by single districts and shall be apportioned pursuant to this section and sections four and five-b of this article at each regular session at which the senate districts are readjusted or altered, and by the same law, among the several counties of the state, as nearly as may be according to the number of their respective inhabitants [, excluding aliens]. Every county heretofore established and separately organized, except the county of Hamilton, shall always be entitled to one member of assembly, and no county shall hereafter be erected unless its population shall entitle it to a member. The county of Hamilton shall elect with the county of Fulton, until the population of the county of Hamilton shall, according to the ratio, entitle it to a member. But the legislature may abolish the said county of Hamilton and annex the territory thereof to some other county or counties.

The quotient obtained by dividing the whole number of inhabitants of the state, [excluding aliens,] by the number of members of assembly, shall be the ratio for apportionment, which shall be made as follows:

One member of assembly shall be apportioned to every county, including Fulton and Hamilton as one county, containing less than the ratio and one-half over. Two members shall be apportioned to every other county. The remaining members of assembly shall be apportioned to the counties having more than two ratios according to the number of inhabitants [,excluding aliens]. Members apportioned on remainders shall be apportioned to the counties having the highest remainders in the order thereof respectively. No county shall have more members of assembly than a county having a greater number of inhabitants [, excluding aliens].

The assembly districts, including the present ones, as existing immediately before the enactment of a law making an apportionment of members of assembly among the counties, shall continue to be the assembly districts of the state until the expiration of the terms of members then in office, except for the purpose of an election of members of assembly for full terms beginning at such expirations.

In any county entitled to more than one member, the board of supervisors, and in any city embracing an entire county and having no board of supervisors, the common council, or if there be none, the body exercising the powers of a common council, shall assemble at such times as the legislature making an apportionment shall prescribe, and divide such counties into assembly districts as nearly equal in number of inhabitants, [excluding aliens,] as may be, of convenient and contiguous territory in as compact form as practicable, each of which shall be wholly within a senate district formed under the same apportionment, equal to the number of members of assembly to which such county shall be entitled, and shall cause to be filed in the office of the secretary of state and of the clerk of such county, a description of such districts, specifying the number of each district and of the inhabitants thereof, [excluding aliens,] according to the census or enumeration used as the population basis for the formation of such districts; and such apportionment and districts shall remain unaltered until after the next reapportionment of members of assembly, except that the board of supervisors of any county containing a town having more than a ratio of apportionment and one-half over may alter the assembly districts in a senate district containing such town at any time on or before March first, nineteen hundred forty-six. In counties having more than one senate district, the same number of assembly districts shall be put in each senate district, unless the assembly districts cannot be evenly divided among the senate districts of any county, in which case one more assembly district shall be put in the senate district in such county having the largest, or one less assembly district shall be put in the senate district in such county having the smallest number of inhabitants, [excluding aliens,] as the case may require. Nothing in this section shall prevent the division, at any time, of counties and towns and the erection of new towns by the legislature.

An apportionment by the legislature, or other body, shall be subject to review by the supreme court, at the suit of any citizen, under such reasonable regulations as the legislature may prescribe; and any court before which a cause may be pending involving an apportionment, shall give precedence thereto over all other causes and proceedings, and if said court be not in session it shall convene promptly for the disposition of the same. The court shall render its decision within sixty days after a petition is filed. In any judicial proceeding relating to redistricting of congressional or state legislative districts, any law establishing congressional or state legislative districts found to violate the provisions of this article shall be invalid in whole or in part. In the event that a court finds such a violation, the legislature shall have a full and reasonable opportunity to correct the law's legal infirmities.

§ 6. Resolved (if the Assembly concur), That the foregoing amendment be submitted to the people for approval at the general election to be held in the year 2021 in accordance with the provisions of the election law.

Explanation – Matter underscored is new; matter in brackets [] is old law to be omitted.

Ballot Proposal 2:

FORM OF SUBMISSION OF PROPOSAL NUMBER TWO, AN AMENDMENT Right to Clean Air, Clean Water, and a Healthful Environment

The proposed amendment to Article I of the New York Constitution would establish the right of each person to clean air and water and a healthful environment. Shall the proposed amendment be approved?

ABSTRACT OF PROPOSAL NUMBER TWO, AN AMENDMENT Right to Clean Air, Clean Water, and a Healthful Environment

The purpose of this proposal is to protect public health and the environment by adding the right of each person to clean air and water and a healthful environment to the Bill of Rights in Article I of the New York Constitution.

TEXT OF PROPOSAL NUMBER TWO, AN AMENDMENT CONCURRENT RESOLUTION OF THE SENATE AND ASSEMBLY

proposing an amendment to article I of the constitution, in relation to the right to clean air and water and a healthful environment

Section 1. Resolved (if the Assembly concur), That article I of the constitution be amended by adding a new section 19 to read as follows:

§ 19. Environmental rights. Each person shall have a right to clean air and water, and a healthful environment.

§ 2. Resolved (if the Assembly concur), That the foregoing amendment be submitted to the people for approval at the general election to be held in the year 2021 in accordance with the provisions of the election law.

Explanation – Matter underscored is new; matter in brackets [] is old law to be omitted.

Ballot Proposal 3:

FORM OF SUBMISSION OF PROPOSAL NUMBER THREE, AN AMENDMENT Eliminating Ten-Day-Advance Voter Registration Requirement

The proposed amendment would delete the current requirement in Article II, § 5 that a citizen be registered to vote at least ten days before an election and would allow the Legislature to enact laws permitting a citizen to register to vote less than ten days before the election. Shall the proposed amendment be approved?

ABSTRACT OF PROPOSAL NUMBER THREE, AN AMENDMENT Eliminating Ten-Day-Advance Voter Registration Requirement

Section 5 of Article II of the New York Constitution now requires that a citizen be registered to vote at least ten days before an election. The proposed amendment would delete that requirement. If this amendment is adopted, the Legislature will be authorized to enact laws permitting a citizen to register to vote less than ten days before the election.

TEXT OF PROPOSAL NUMBER THREE, AN AMENDMENT CONCURRENT RESOLUTION OF THE SENATE AND ASSEMBLY

proposing an amendment to section 5 of article II of the constitution, in relation to the ten day advance registration requirement

Section 1. Resolved (if the Assembly concur), That section 5 of article II of the constitution be amended to read as follows:

§ 5. Laws shall be made for ascertaining, by proper proofs, the citizens who shall be entitled to the right of suffrage hereby established, and for the registration of voters [; which registration shall be completed at least ten days before each election]. Such registration shall not be required for town and village elections except by express provision of law.

§ 2. Resolved (if the Assembly concur), That the foregoing amendment be submitted to the people for approval at the general election to be held in the year 2021 in accordance with the provisions of the election law.

Explanation – Matter underscored is new; matter in brackets [] is old law to be omitted.

Ballot Proposal 4:

FORM OF SUBMISSION OF PROPOSAL NUMBER FOUR, AN AMENDMENT Authorizing No-Excuse Absentee Ballot Voting

The proposed amendment would delete from the current provision on absentee ballots the requirement that an absentee voter must be unable to appear at the polls by reason of absence from the county or illness or physical disability. Shall the proposed amendment be approved?

ABSTRACT OF PROPOSAL NUMBER FOUR, AN AMENDMENT Authorizing No-Excuse Absentee Ballot Voting

The purpose of this proposal is to eliminate the requirement that a voter provide a reason for voting by absentee ballot. The proposed amendment would do so by deleting the requirement currently in the Constitution that restricts absentee voting to people under one of two specific circumstances: (1)

those who expect to be absent from the county of their residence, or from New York City for residents of that city, on Election Day, and (2) those who are unable to appear at their polling place because of illness or physical disability.

**TEXT OF PROPOSAL NUMBER FOUR, AN AMENDMENT
CONCURRENT RESOLUTION OF THE SENATE AND ASSEMBLY**

proposing an amendment to section 2 of article II of the constitution, in relation to authorizing ballot by mail by removing cause for absentee ballot voting

Section 1. Resolved (if the Assembly concur), That section 2 of article II of the constitution be amended to read as follows:

§ 2. The legislature may, by general law, provide a manner in which, and the time and place at which, qualified voters [who, on the occurrence of any election, may be absent from the county of their residence or, if residents of the city of New York, from the city, and qualified voters who, on the occurrence of any election, may be unable to appear personally at the polling place because of illness or physical disability,] may vote and for the return and canvass of their votes in any election.

§ 2. Resolved (if the Assembly concur), That the foregoing amendment be submitted to the people for approval at the general election to be held in the year 2021 in accordance with the provisions of the election law.

Explanation – Matter underscored is new; matter in brackets [] is old law to be omitted.

Ballot Proposal 5:

**FORM OF SUBMISSION OF PROPOSAL NUMBER FIVE, AN AMENDMENT
Increasing the Jurisdiction of the New York City Civil Court**

The proposed amendment would increase the New York City Civil Court's jurisdiction by allowing it to hear and decide claims for up to \$50,000 instead of the current jurisdictional limit of \$25,000. Shall the proposed amendment be approved?

**ABSTRACT OF PROPOSAL NUMBER FIVE, AN AMENDMENT
Increasing the Jurisdiction of the New York City Civil Court**

The purpose of this proposal is to amend Article VI, Section 15 of the New York Constitution to increase the jurisdiction of the New York City Civil Court. The New York City Civil Court is currently limited to hearing and deciding claims for \$25,000 or less. The proposed amendment would allow the New York City Civil Court to hear and decide claims for \$50,000 or less.

**TEXT OF PROPOSAL NUMBER FIVE, AN AMENDMENT
CONCURRENT RESOLUTION OF THE SENATE AND ASSEMBLY**

proposing an amendment to section 15 of article VI of the constitution relating to the New York city civil court

Section 1. Resolved (if the Assembly concur), That subdivision b of section 15 of article VI of the constitution be amended to read as follows:

b. The court of city-wide civil jurisdiction of the city of New York shall have jurisdiction over the following classes of actions and proceedings which shall be originated in such court in the manner provided by law: actions and proceedings for the recovery of money, actions and proceedings for the recovery of chattels and actions and proceedings for the foreclosure of mechanics liens and liens on personal property where the amount sought to be recovered or the value of the property does not exceed [twenty-five] fifty thousand dollars exclusive of interest and costs, or such smaller amount as may be fixed by law; over summary proceedings to recover possession of real property and to remove tenants therefrom and over such other actions and proceedings, not within the exclusive jurisdiction of the supreme court, as may be provided by law. The court of city-wide civil jurisdiction shall further exercise such equity jurisdiction as may be provided by law and its jurisdiction to enter judgment upon a counterclaim for the recovery of money only shall be unlimited.

§ 2. Resolved (if the Assembly concur), That the foregoing amendment be submitted to the people for approval at the general election to be held in the year 2021 in accordance with the provisions of the election law.

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Explanation – Matter underscored is new; matter in brackets [] is old law to be omitted.

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**EXHIBIT 4 TO MCKAY AFFIRMATION -
NEW YORK TIMES ARTICLE, INTERVIEW WITH KATHY HOCHUL:
'I FEEL A HEAVY WEIGHT OF RESPONSIBILITY' [925 - 928]**

Kathy Hochul Interview: 'I Feel a Heavy Weight of Responsibility' - The New York Times <https://www.nytimes.com/2021/08/25/nyregion/kathy-hochul-interview.html>

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The New York Times <https://www.nytimes.com/2021/08/25/nyregion/kathy-hochul-interview.html>

Interview With Kathy Hochul: 'I Feel a Heavy Weight of Responsibility'

Ms. Hochul sat down with The New York Times for her first one-on-one interview after becoming New York's first female governor.



By Katie Glueck and Luis Ferré-Sadurni

Published Aug. 24, 2021 Updated Oct. 14, 2021

ALBANY, N.Y. — Governor Kathy C. Hochul, the first woman in history to lead New York, took the helm this week under extraordinary circumstances, as she replaced a disgraced governor and moved to confront staggering public health, educational and economic challenges across the state.

Minutes after sketching out her vision in her initial address as governor on Tuesday, Ms. Hochul — a Western New York Democrat — sat down with The New York Times at the State Capitol. In a wide-ranging interview, the relatively little-known executive discussed her governing philosophy and her plans for the state, her political leanings (“I’m a Biden Democrat”) and her ambitions for her new team (she has decided on her lieutenant governor, she said).

And she offered some of her most extensive remarks to date about how she contrasts with Andrew M. Cuomo, whom she replaced in office following his resignation.

Below are edited and condensed excerpts from the interview with Ms. Hochul, 62, whose remarkable political rise has taken her from local official to congresswoman, and now from lieutenant governor to one of the most consequential jobs in the nation.

You’re making history as the first female governor to lead New York. To what extent does that feel meaningful to you?

I feel a heavy weight of responsibility on my shoulders.

I take it very seriously, my position as first female governor. But I want at the end of my term — terms — to make sure that no woman, no girl, no teenager ever feels there’s anything they can’t do.

How should New Yorkers judge whether your tenure was a success?

Do we get stuff done? I’m direct. I have a very focused agenda. And I hold myself to the highest standards. I judge myself more harshly than any voter, or any New Yorker, will.

Judge me by specific accomplishments in terms of what I announced today and what I’ll announce in the State of the State address, and hold me accountable to those ambitions. But at the end of the day, I want people to say that I played a major role in restoring people’s confidence in the ability of state government to be on their side, to fight for them, and again — I’ll say it again — to get things done.

Are you, as governor, directing teachers statewide to get the vaccine?

I want everyone in the state of New York to get the vaccine, particularly teachers, and people who are in a school environment — or have a testing requirement, frequent testing.

However, the governor does not possess the executive powers that were in place a year ago, so I will be working hard, developing partnerships with these stakeholders who can work with me to get this done.

Governor Cuomo’s response to the pandemic was sometimes criticized for being too top-down and dismissive of public health experts’ advice. How will your approach differ from his?

I’m hard-wired to view everything that Albany does through the lens of a local town, city, county official.

That’s a shift in philosophy. I’m here, ready — I’m going to give you direction; I’ll back you up. But I also don’t want to take away powers that rest with you, because I know what that feels like.

I was in that position when Albany would be so heavy-handed. But I also think a pandemic requires a strong response. I will give strong responses. I’m decisive. And I’ll back everything I do up with consultation with people who are in the field.



Ms. Hochul said that her political worldview had been shaped by a notion that it is morally responsible to fight for the underdog. Cindy Schultz for The New York Times

What is the appropriate balance between demonstrating executive leadership and deferring to local officials?

It's consultation with the locals, and then the buck stops with me.

Your predecessor was known to have a heavy hand with the Metropolitan Transportation Authority. How much authority are you looking to assert over the M.T.A.?

I've already had conversations with leadership; I've been briefed on our significant projects, and I want to get them done.

Authority doesn't have to be concentrated in me when I'm hiring outstanding professionals who know their jobs. I will be there if there's something that's not following what I want. But I also know that day to day, they're the ones that have to be accountable. Accountable to the riders, accountable to me. But I also know that granting more freedom allows them to rise.

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You've been in New York politics a long time, but you've also been open about the fact that you did not work closely with Governor Cuomo. If you weren't especially involved in his policymaking decisions, what do you say to people who question whether you have the managerial experience to lead the state forward?

If they have any questions about my ability to lead, speak to every single person who's in government with me, because they know I bring up a collaborative approach to government. And I know that that is going to be a breath of fresh air. I've heard that from countless current employees, cabinet members, heads of agencies, heads of authorities.

Not being in every single room means I was somewhere else learning the state like no other. Nobody knows the state — no person alive knows the state the way I do. That's because I set out to make this role, redefine it as I have every single role I've had. I've done that as lieutenant governor, and that's why I have the breadth of knowledge, relationships and just a deep love for the state.

One thing that was probably not in your job description as lieutenant governor was publicly disagreeing with Governor Cuomo. Now that you are governor, what is one main policy difference that you had with him?

I thought we should have done more with the New York City Housing Authority. I think there's still an opportunity. So many people are living in squalor. The heat is not reliable in the wintertime. It's too hot in the summertime. Things are breaking down, and I want to get back to the nuts and bolts. Everybody has the dignity, even the dignity of having a good roof over their heads.

I've seen how transformative it is when you give people a safe home, something that so many take for granted, but if you don't have it, it's terrifying.

So that's one area where I would spend more public time and effort.

Do you plan to use your influence to help Democrats expand the House majority through the redistricting process?

Yes. I am also the leader of the New York State Democratic Party. I embrace that.

I have a responsibility to lead this party, as well as the government. I'm going to be doing whatever I can to let people know that the values of the Democratic Party today are part of who I am, fighting for people that just had a tough blow dealt to them in life.

The Democratic Party has to regain its position that it once had when I was growing up. My grandparents were F.D.R. Democrats. My parents were J.F.K. Democrats.

Today, I'm a Biden Democrat.

Are you saying that because he's the president or because you share similar worldviews?

Because it comes from a view that all of us have a moral responsibility to fight for the underdog.

That's what I've done my whole life. To engage in policies, like fighting for the Affordable Care Act, which I did — which led to my demise in Congress. The core value is fighting for people, for health care, for helping them get out of this pandemic.

I'm eager to lead that party and use the power that I have to help make sure there are more Democrats there to help Joe Biden get his agenda through the Senate. I just spoke to Senator Schumer a short time ago. I talked to Joe Biden last night. Nancy Pelosi has called me a couple days ago.

So these are relationships I have, but I also take seriously my job to increase their numbers so the Democratic agenda gets through and is there to help the American people.

Have you decided whom your lieutenant governor will be? Yes or no?

[In a hushed voice, with an almost-wink] Yes.

Who?

Stay tuned.

Do you support the congestion pricing plan for New York City, and do you want to accelerate its implementation?

I've supported it from its inception.

I believe it has to happen for all the reasons we know congestion pricing works. But I also got to work on finding out the rollout time. I know they're saying from 18 months to 16 months, but I want to check into that.

Do you agree with Eric Adams, the Democratic nominee for New York City mayor, that changes should be considered for the state's bail law, and if so, what do you believe should be changed?

I'm not sure the bail law is being implemented the way it was intended.

Judges have far more discretion to ensure that people meet the standards put forth in the law so no one who's been convicted of a violent crime is able to get out. The law spells out what's supposed to be in place for judges to evaluate, and I'm not 100 percent sure that's what's happening.

So I've not seen evidence — and I support bail reform, support it strongly, because we've had an unjust system. Same crime, two people. One's rich, one's poor. One's going to jail, one is staying at home. I've said for years how un-American that is.

We also have a responsibility to protect our citizens and protect our communities, so I'm willing to look at that.

Governor Cuomo said that the attorney general's report was unfair and politically motivated. Do you think he had adequate due process?

I had full confidence, from the very beginning, in the attorney general's report. I have confidence in the conclusion and the results.

Do you think you'd beat him in a primary next year?

I have a very good record of winning elections, especially the ones that people tell me I can't win.

You've spoken with a lot of national leaders in recent weeks, including Hillary Clinton. What advice did she give you?

"Stay strong."

She was so gracious in offering to be there as a sounding board, talk whenever I wanted to.

I'll never forget, when I won my special election in Congress, I got my head kicked in.

Kate Hooper Interview: How a Heavy Weight of Responsibility 'The' <https://www.nytimes.com/2021/08/25/nyregion/kate-hooper-interview.html>

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So after that, I'm battle-scarred. Hillary has been through the same. There aren't many people who've been in those trenches. It creates a special bond.

That's what I talked about with Hillary — changing people's images of women in executive positions. And that's what I want to do.

EXHIBIT 5 TO MCKAY AFFIRMATION -
GOVERNOR'S APPROVAL MEMORANDA,
DATED FEBRUARY 3, 2022 [929 - 932]

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STATE OF NEW YORK
EXECUTIVE CHAMBER
ALBANY 12224

APPROVAL # 2
CHAPTER # 13

February 3, 2022

MEMORANDUM filed with Assembly Bill 9039-A, entitled:

"AN ACT to amend the state law, in relation to creation of congressional districts; and to repeal article 7 of such law relating thereto"

MEMORANDUM filed with Assembly Bill 9040-A, entitled:

"AN ACT to amend the state law, in relation to establishing assembly and senate districts; and to repeal article 8 of such law relating thereto"

MEMORANDUM filed with Assembly Bill 9167, entitled:

"AN ACT to amend the state law, in relation to congressional districts"

MEMORANDUM filed with Assembly Bill 9168, entitled:

"AN ACT to amend the state law, in relation to assembly and senate districts"

APPROVED

These bills are necessary to reapportion districts and to provide certainty and clarity regarding such districts in a timely manner, allowing for efficient administration of the electoral process.

The enactment of these bills marks the culmination of the legal process of redistricting for congressional and State legislative districts in New York State. These bills create new congressional districts and State Senate and Assembly districts, based on the 2020 United States Census, and as required by the State and federal constitutions.

Signing these bills will allow the boards of elections to begin the process of administering elections with these new district maps, and will ensure that New Yorkers and candidates for elected office have the information they need with as much notice as possible to exercise their right to vote and participate in our democracy.

This bill is approved.

Ruth Hochul



STATE OF NEW YORK
EXECUTIVE CHAMBER
ALBANY 12224

APPROVAL # 3
CHAPTER # 14

February 3, 2022

MEMORANDUM filed with Assembly Bill 9039-A, entitled:

“AN ACT to amend the state law, in relation to creation of congressional districts; and to repeal article 7 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9040-A, entitled:

“AN ACT to amend the state law, in relation to establishing assembly and senate districts; and to repeal article 8 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9167, entitled:

“AN ACT to amend the state law, in relation to congressional districts”

MEMORANDUM filed with Assembly Bill 9168, entitled:

“AN ACT to amend the state law, in relation to assembly and senate districts”

APPROVED

These bills are necessary to reapportion districts and to provide certainty and clarity regarding such districts in a timely manner, allowing for efficient administration of the electoral process.

The enactment of these bills marks the culmination of the legal process of redistricting for congressional and State legislative districts in New York State. These bills create new congressional districts and State Senate and Assembly districts, based on the 2020 United States Census, and as required by the State and federal constitutions.

Signing these bills will allow the boards of elections to begin the process of administering elections with these new district maps, and will ensure that New Yorkers and candidates for elected office have the information they need with as much notice as possible to exercise their right to vote and participate in our democracy.

This bill is approved.

Ruth Hochul



STATE OF NEW YORK
EXECUTIVE CHAMBER
ALBANY 12224

APPROVAL #4
CHAPTER #15

February 3, 2022

MEMORANDUM filed with Assembly Bill 9039-A, entitled:

“AN ACT to amend the state law, in relation to creation of congressional districts; and to repeal article 7 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9040-A, entitled:

“AN ACT to amend the state law, in relation to establishing assembly and senate districts; and to repeal article 8 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9167, entitled:

“AN ACT to amend the state law, in relation to congressional districts”

MEMORANDUM filed with Assembly Bill 9168, entitled:

“AN ACT to amend the state law, in relation to assembly and senate districts”

APPROVED

These bills are necessary to reapportion districts and to provide certainty and clarity regarding such districts in a timely manner, allowing for efficient administration of the electoral process.

The enactment of these bills marks the culmination of the legal process of redistricting for congressional and State legislative districts in New York State. These bills create new congressional districts and State Senate and Assembly districts, based on the 2020 United States Census, and as required by the State and federal constitutions.

Signing these bills will allow the boards of elections to begin the process of administering elections with these new district maps, and will ensure that New Yorkers and candidates for elected office have the information they need with as much notice as possible to exercise their right to vote and participate in our democracy.

This bill is approved.

Ruth Hochul



STATE OF NEW YORK
EXECUTIVE CHAMBER
ALBANY 12224

APPROVAL #5
CHAPTER #16

February 3, 2022

MEMORANDUM filed with Assembly Bill 9039-A, entitled:

“AN ACT to amend the state law, in relation to creation of congressional districts; and to repeal article 7 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9040-A, entitled:

“AN ACT to amend the state law, in relation to establishing assembly and senate districts; and to repeal article 8 of such law relating thereto”

MEMORANDUM filed with Assembly Bill 9167, entitled:

“AN ACT to amend the state law, in relation to congressional districts”

MEMORANDUM filed with Assembly Bill 9168, entitled:

“AN ACT to amend the state law, in relation to assembly and senate districts”

APPROVED

These bills are necessary to reapportion districts and to provide certainty and clarity regarding such districts in a timely manner, allowing for efficient administration of the electoral process.

The enactment of these bills marks the culmination of the legal process of redistricting for congressional and State legislative districts in New York State. These bills create new congressional districts and State Senate and Assembly districts, based on the 2020 United States Census, and as required by the State and federal constitutions.

Signing these bills will allow the boards of elections to begin the process of administering elections with these new district maps, and will ensure that New Yorkers and candidates for elected office have the information they need with as much notice as possible to exercise their right to vote and participate in our democracy.

This bill is approved.

Ruth Hochul

DECLARATION OPPOSING MOTION TO AMEND THE PETITION OF MATTHEW D. BROWN, ESQ., FOR RESPONDENTS GOVERNOR HOCHUL AND LT. GOVERNOR BENJAMIN, DATED FEBRUARY 23, 2022 [933 - 938]

FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM

NYSCEF DOC. NO. 88

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN**

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioner,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

**Declaration Opposing Motion
to Amend the Petition**

Index No. E2022-0116CV

McAllister, J.S.C.

Return Date:
March 3, 2022

Matthew D. Brown, an attorney admitted to practice before the Courts of the State of New York, hereby states under penalties of perjury:

1. I am an Assistant Attorney General in the New York State Attorney General's Office, attorney for Respondents Governor Hochul and Lt. Governor Benjamin (the "Executive Respondents").
2. This Declaration is submitted to oppose Petitioner's Order to Show Cause seeking leave to amend the Petition.
3. The Executive Respondents oppose Petitioners' motion for leave to amend because the Governor and Lt. Governor were not properly served with the Order to Show Cause for leave to amend and because the amendment would be futile.

This Action

4. Petitioners brought this action by filing a Petition and proposed Order to Show Cause on February 3, 2022 (NYSEC #1 and #2).

5. The Court signed the Order to Show Cause on February 7, 2022 (NYSEC #11).

6. Petitioners purported to serve the OTSC on Governor Hochul and Lt. Governor Benjamin on February 8, 2022 (NYSEC #56 and #57).

7. Petitioners purported to complete service of the OTSC on Governor Hochul and Lt. Governor Benjamin by serving the Attorney General's Office in New York, New York (NYSEC #62).

8. However, CPLR §2214(d) requires service be made at the office of the Attorney General nearest to where the action is venued (here Steuben County Supreme Court).

9. Petitioners filed a proposed Order to Show Cause seeking leave to file an Amended Petition on February 8, 2022 (NYSEC #13) and proposed Amended Petition (NYSEC #18).

10. The Court signed the second Order to Show Cause for leave to file an Amended Petition on February 9, 2022 (NYSEC #24).

11. Petitioners did not serve the second Order to Show Cause on Governor Hochul.

12. Petitioners purported to serve Lt. Governor Benjamin with the second Order to Show Cause on February 10, 2022 (NYSEC #63).

13. Petitioners purported to have completed service on Lt. Governor Benjamin by serving the second OTSC on the Attorney General's Office in New York, New York (NYSEC #62).

14. However, CPLR §2214(d) requires service be made at the office of the Attorney General nearest to where the action is venued (here, Steuben County Supreme Court).

15. By email from Misha Tsyetlin, Esq., to various individuals including the executive

Respondents' counsel, dated February 10, 2022 (attached as **Exhibit A**), Petitioners' counsel proposed that "[a]ll parties agree to accept email service of all documents not filed through NYSCEF, including the two Orders to Show Cause already entered and supporting papers."

16. It is unclear what is meant by "service of all documents **not** filed through NYSCEF, including the two Orders to Show Cause already entered" (emphasis supplied).

17. Eric Hecker, Esq. (attorney for the Senate Majority Leader) responded via email that "[r]egarding email service, we consent". See **Exhibit A**.

18. Attorneys for the Governor and Lt. Governor did not respond to this email exchange.

19. Regardless, copies of the first Order to Show Cause and second Order to Show Cause were not served via email on counsel for the Governor or Lt. Governor.

20. Thus, even if the email exchange between Mr. Hecker and Mr. Tsyetlin could be interpreted as the Governor and Lt. Governor agreeing to service of the first and second Orders to Show Cause by email (an interpretation that the Executive Respondents reject), such service was never completed because neither the first nor second Order to Show Cause was served via email, or any other means, upon the Governor or the Lt. Governor.

21. Because service of the second OTSC was not completed as to Governor Hochul or Lt. Governor Benjamin, the OTSC must be dismissed and Petitioners' motion for leave to amend the Petition should be denied.

Amending the Petition Would Unduly Interfere with the 2022 Election Cycle

22. The motion for leave to amend the Petition should be denied because allowing the amendment would interfere with the New York State 2022 election cycle.

23. Any change in the calendar will disrupt the intricate interrelated processes prescribed by the election law for ballot access (petitioning), administrative challenges to

petitions, judicial review of ballot access challenges, ballot preparation, scheduling poll workers and poll sites, early voting and voting. Moreover, the date of the primary as the fourth Tuesday in June is statutory and mandated by a federal district court order.

24. The New York State primary election is June 28, 2022, as set by law and US District Court Order. See NY Election Law §8-100 and **Exhibit B**, Decision and Order, NDNY, *United States v. State of New York*, 10-cv-1214, January 27, 2012 (NY's primary for federal office shall be held the fourth Tuesday of June).

25. The last day to mail out absentee ballots to military servicemen and women under federal law is May 13, 2022. See 52 USC §20302(a)(8)(b).

26. Ballots for the primary election must therefore be printed prior to May 13, 2022 and cannot be changed after that date because there cannot be different ballots with different candidates and different districts for the same election.

27. The local Boards of Election must have enough time to prepare ballots and get them printed.

28. The New York Election law Section 6-134(4) makes March 1, 2022 the first day for signing designating petitions.

29. By law, candidates are given a 37-day period to circulate designating petitions and collect signatures.

30. Under New York Election Law §6-158(1), designating petitions must be filed between April 4 and April 7, 2022.

31. The limitations period to commence legal challenges regarding designating petitions is 4/21.

32. The last date for the Board of Elections to certify ballots is April 27, 2022.

33. Counties must certify the primary ballot no later than 5/5.

34. Under federal law, militaries and overseas ballots must be mailed for federal elections—such as congressional elections—by 5/13.

35. Potential candidates must be given enough time to collect signatures from voters within the district for which they intend to run for election.

36. Here, if Petitioners amend their Petition, Respondents must be given time to respond to the Amended Petition.

37. Further, if the Court allows discovery there will be motion practice regarding the scope of discovery based on relevance and various privileges and immunities.

38. Further, if Petitioners are allowed the voluminous discovery they seek, such discovery will take several weeks, or more likely longer.

39. Then, the parties will need time to brief the Court regarding the discovery and the points of law.

40. The Court will then need time to digest the parties' briefs and make a ruling.

41. Regardless of how the Court rules, this matter will likely be appealed.

42. If the Court (and appellate courts) were to find in favor of Petitioners, the maps would need to be redrawn by the Legislature.

43. Based upon the foregoing, it is impossible to allow the Petitioners to amend their Petition and still have time to meet any of the deadlines for the 2022 election cycle.

44. As explained in the accompanying memorandum of law, Courts should not interfere with an electoral cycle that already began—as is the case here (candidates are already collecting signatures for their designating petitions). Thus, the Court should deny the motion for leave to amend the Petition.

45. Further, again, because the second OTSC was not properly served on the Governor or Lt. Governor, it should be dismissed, and the motion denied.

46. And, as explained in these Respondents' Memorandum of Law, because the Governor and Lt. Governor are entitled to legislative immunity, absolute immunity, and because this matter is nonjusticiable, the amendment would be futile, and Petitioners' motion should be denied.

47. Further, the Executive Respondents join in the arguments made by co-Respondents in opposition to the motion for leave to amend.

WHEREFORE, Respondents respectfully request an Order denying Petitioners' Order to Show Cause seeking leave to amend the Petition and granting such other relief as the Court deems proper.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2022

s/ Matthew D. Brown
Matthew D. Brown
Attorney for Defendants
Assistant Attorney General
NYS Office of the Attorney General
144 Exchange Boulevard
Suite 200
Rochester, New York 14614
(585) 327-3257
matthew.brown@ag.ny.gov

EXHIBIT A TO DECLARATION -
EMAILS [939 - 944]**FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM**

NYSCEF DOC. NO. 89

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

From: Eric Hecker <ehecker@chwillp.com>
Sent: Friday, February 11, 2022 10:27 AM
To: Tseytlin, Misha <Misha.Tseytlin@troutman.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Dutton, Sean T.H. <Sean.Dutton@troutman.com>; George H. Winner Jr. <gwinner@kmw-law.com>
Cc: John Cuti <jcuti@chwillp.com>; Alex Goldenberg <agoldenberg@chwillp.com>; Alice Reiter <areiter@chwillp.com>; Chill, C. Daniel <DChill@graubard.com>; Reich, Elaine <EReich@graubard.com>; O'Brien, Ted <Ted.O'Brien@ag.ny.gov>; McKay, Heather <Heather.McKay@ag.ny.gov>; Halliyadde, Muditha <Muditha.Halliyadde@ag.ny.gov>
Subject: Re: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

[EXTERNAL]

Misha,

We have carefully reviewed your email with our clients and with counsel for the Assembly and the Attorney General, and we submit this joint response.

We begin by reiterating that we will continue to reach compromises wherever feasible. However, we were surprised by the positions you have taken, many of which we believe are untenable.

Regarding the petition signature deadline, having now consulted with our clients, we have concluded that our clients do not have the authority to stipulate to what would amount to an amendment of duly enacted statutes, so we do not believe that we can push the deadlines back by stipulation.

Regarding the case schedule, all parties agreed during the meet and confer teleconference that Respondents' papers in opposition to the two pending orders to show cause are due on February 24. We hope to be able to meet that deadline, but our ability to do that will hinge on when you serve your expert reports and brief. For the record, our position is that it was improper for you to commence this special proceeding without filing and serving any expert reports or a brief with your petition, and that by failing to do so, you have waived your right to do so. Indeed, we do not read either of the orders to show cause to permit you to serve additional papers in support of either the Petition or your pending motion. With that said, if you will serve your expert reports by Monday, February 14, we will not move to strike them. Especially given the highly complex nature of the statistical issues we are assuming you will attempt to raise, it would be impractical for us to be able to submit rebuttal expert reports by February 24 without having at least ten days to review and respond to your expert reports. We see no reason why you should need any additional time, much less time past Monday, to serve your brief (which you did not file with your petition as is customary, or seek leave to file or even mention in either of your proposed orders to show cause). So long as you serve your expert reports and brief no later than Monday, February 14, we see no reason to adjourn the current March 3 return date for the Petition and the pending motion.

Regarding discovery, we are surprised by the breadth and depth of the discovery you are seeking in this special proceeding, in which discovery is disfavored and available only by leave of the Court. With respect to your question about where and how the documents you are seeking are maintained, you purportedly are seeking every single document that was relevant to or considered by anyone in connection with the redistricting process, so the answer is that those documents are maintained in the electronic and/or paper files of every person who was involved in the redistricting process in any way. If you would like to provide us with proposed demands, we will review them and continue this discussion in good faith, but our position is that you currently do not have leave to obtain discovery and that the Court should not grant you such leave. Our reasons for that position – including, without limitation, the overbreadth of what you are seeking, and the impossibility of gathering and reviewing documents, creating a privilege log, briefing the weighty legislative and attorney-client privilege issues that would be raised, submitting documents that are claimed to be privileged for an in camera review, and exhausting any appeals that may be necessary in the next two weeks – are beyond the scope of this response, and we reserve all of our rights with respect to opposing any discovery you may seek leave to conduct. But again, we of course will continue our discussions with you to see if any common ground can be identified.

Regarding your motion to amend, we do not consent to the filing of your amended petition. Our position is, among other things, that allowing you to greatly expand the scope of this proceeding, with no realistic hope of obtaining a final judgment and completing any appeals that may be necessary anytime soon, would be unduly prejudicial to the election process, and also that it would be unduly prejudicial for Respondents to have to address expert reports regarding two reapportionment plans on such a compressed schedule.

Regarding email service, we consent.

Regarding brief length, as set forth above, our position is that you have waived your right to submit an opening brief. If you serve your brief by Monday February 14, we will not move to strike it, and we would consent to 10,000 words, provided that you likewise consent to the same for Respondents. We believe that the 4,200 words provided for in Rule 202.8-b is sufficient for your reply brief, but we would consent to 5,000 words as a courtesy.

If you prefer to respond to the above by email, of course feel free to do so. If you would prefer to resume our discussions by telephone, we will make ourselves available at the soonest time that is convenient for all counsel. We look forward to continuing to work with you constructively to narrow any areas of disagreement to the greatest extent possible.

Eric Hecker
Cuti Hecker Wang LLP
305 Broadway, Suite 607
New York, New York 10007

FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM

NYSCEF DOC. NO. 89

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

Tel: 212.620.2600 | Fax: 212.620.2612
 Email: hecker@chwllp.com
 Pronouns: he/him/his

From: "Tseytlin, Misha" <Misha.Tseytlin@troutman.com>
Date: Thursday, February 10, 2022 at 4:58 PM
To: Eric Hecker <hecker@chwllp.com>, John Cuti <jcuti@chwllp.com>, Alex Goldenberg <agoldenberg@chwllp.com>, Alice Reiter <areiter@chwllp.com>, "Chill, C. Daniel" <DChill@graubard.com>, "Reich, Elaine" <EReich@graubard.com>, "O'Brien, Ted" <Ted.O'Brien@ag.ny.gov>, "McKay, Heather" <Heather.McKay@ag.ny.gov>, "Halliyadde, Muditha" <Muditha.Halliyadde@ag.ny.gov>
Cc: "Moskowitz, Bennet J." <Bennet.Moskowitz@troutman.com>, "George H. Winner Jr." <gwinner@kmw-law.com>, "Dutton, Sean T.H." <Sean.Dutton@troutman.com>
Subject: RE: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

Counsel,

Thank you for taking the time to speak with us earlier today. Given the forthcoming March 1, 2022 deadline for candidates to start collecting signatures for petitions, we greatly appreciate that you all made time to speak about these important issues. We reiterate that we appreciate your professionalism and desire – which we share – to reach compromises wherever feasible.

Per your request, we are providing the following draft proposal to facilitate the parties' ongoing discussions regarding the case schedule and related matters. As discussed, we understand no party is committing to a particular path unless and until an agreement is formalized (i.e., the list below is for discussion only).

Eric: You had mentioned some concerns you had about potential undue burdens related to discovery requests. We have no desire to unduly burden anyone. To enable us to address your concerns, we ask that you please share with us where and how the documents referenced below are maintained, so we can consider ways to reduce any potential burdens.

Moving March 1 Petition Signature Deadline

- Parties agree to the Court entering an order pushing back the period for candidates to collect signatures for petitions, N.Y. Election Law § 6-134(4); N.Y. Election Law § 6-158(1), by one week, so that this period now would start on March 8, and end on April 11–14.

Proposed Case Schedule (Working Backwards And Assuming Petition Signature Date Moved to March 8)

- Parties agree that scheduling applies to all issues in the Amended Petition (i.e., both Senate and congressional districts), so as to avoid separate or serial briefing.
- Petitioners' Expert Reports: February 15, 2022.
- Petitioners' Opening Brief: February 17, 2022.
- Respondents' Response And Expert Reports: February 24, 2022 (if return date remains March 3) or February 28, 2022 (if Court moves return date to March 7, 2022).
- Petitioners' Reply with any Reply Expert Reports due: March 2, 2022 (if return date remains March 3) or March 6, 2022 (if Court moves return date to March 7, 2022).
- Return date: March 3, 2022 or March 7, 2022, based upon what the Court decides.

Discovery (Without prejudice to any Party's right to seek leave to serve additional discovery requests as appropriate)

- Petitioners' Discovery Requests
 - Depositions
 - IRC (Subpoena)
 - Elaine Frazier
 - John Flateau
 - Ivelisse Cuevas-Molina
 - David Imamura
 - Eugene Bengier
 - Respondents
 - Governor Hochul
 - Senate Majority Leader Andrea Stewart-Cousins
 - Speaker Carl Heastie
 - LATFOR
 - Eric Katz (Counsel to NY Senate Office of Majority Counsel)
 - Phil Chonigman (Co-Executive Director)
 - Assemblymember Kenneth Zebrowski
 - Senator Mike Gianaris
 - Request for documents to Respondents seeking:
 - Documents concerning Respondents' contacts with IRC Commissioners Frazier, Flateau, Cuevas-Molinas, Imamura, and Bengier.
 - Communications concerning the IRC's work, which Respondents received from third parties.
 - Any other documents and communications relevant to and considered by Respondents in the process of New York's redistricting of Congressional and state Senate districts in the current decennial.
- Petitioners would serve their discovery requests tomorrow, February 11.
- Parties to stipulate to expedited response deadlines for stipulated discovery requests, with the goal of having discovery completed by February 24. This is without prejudice to any party raising any objections it may have with any discovery request.

Stipulate to amended petition.

- Respondents to stipulate to Petitioners' leave to file the Amended Petition, thereby relieving all parties of having to devote further resources to Petitioners' pending Motion for Leave to Amend.

Email Service

- All parties agree to accept email service of all documents not filed through NYSCEF, including the two Orders to Show Cause already entered and supporting papers.

Word Limits on Briefs

- All parties agree to double the word limits from those found in Rule 202.8-b of the Uniform Civil Rules for the Supreme Court and the County Court.
 - Memoranda of Law in Chief: 14,000 words
 - Reply Memoranda: 8,400 words.

Best,

Misha Tseytlin
Partner
troutman pepper

FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM

NYSCEF DOC. NO. 89

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/24/2022Direct: 312.759.5947 | Mobile: 608.999.1240 | Internal: 20-5947
misha.tseytlin@troutman.com

From: Eric Hecker <ehecker@chwllp.com>
Sent: Wednesday, February 9, 2022 5:13 PM
To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; George H. Winner Jr. <gwinner@kmw-law.com>; Tseytlin, Misha <Misha.Tseytlin@troutman.com>
Cc: John Cuti <jcuti@chwllp.com>; Alex Goldenberg <agoldenberg@chwllp.com>; Alice Reiter <areiter@chwllp.com>; Chill, C. Daniel <DChill@graubard.com>; Reich, Elaine <EReich@graubard.com>; O'Brien, Ted <Ted.O'Brien@ag.ny.gov>; McKay, Heather <Heather.McKay@ag.ny.gov>; Halliyadde, Muditha <Muditha.Halliyadde@ag.ny.gov>
Subject: Re: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

EXTERNAL SENDER

Thank you for reaching out. I am copying my colleagues, counsel for the Assembly, and attorneys with the Attorney General's office, which may or may not represent certain Respondents. We have conferred about our respective schedules and are available at noon tomorrow if that works for you.

Eric Hecker
 Cuti Hecker Wang LLP
 305 Broadway, Suite 607
 New York, New York 10007

Tel: 212.620.2600 | Fax: 212.620.2612
 Email: ehecker@chwllp.com
 Pronouns: he/him/his

From: "Moskowitz, Bennet J." <Bennet.Moskowitz@troutman.com>
Date: Wednesday, February 9, 2022 at 4:17 PM
To: Eric Hecker <ehecker@chwllp.com>
Cc: "George H. Winner Jr." <gwinner@kmw-law.com>, "Tseytlin, Misha" <Misha.Tseytlin@troutman.com>
Subject: Tim Harkenrider, et al. v. Governor Kathy Hochul, et al., E2022-0116CV (Steuben Cnty.)

Mr. Hecker,

We represent Petitioners in the referenced matter. We would like to meet and confer with you about the case schedule at your earliest convenience. What is your availability tomorrow?

Sincerely,
 Bennet

Bennet J. Moskowitz*

Partner
 Direct: 212.704.6087 | Internal: 13-6087
bennet.moskowitz@troutman.com

troutman pepper
 875 Third Avenue
 New York, NY 10022

FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM

NYSCEF DOC. NO. 89

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 02/24/2022

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EXHIBIT B TO DECLARATION -MEMORANDUM-
 DECISION AND ORDER, IN UNITED STATES OF AMERICA V. STATE
 OF NEW YORK, DATED JANUARY 27, 2012 [945 - 961]

FILED: STEUBEN COUNTY CLERK 02/24/2022 05:07 PM

INDEX NO. E2022-0116CV

NYSCEF DOC. NO. 90

Case 1:10-cv-01214-GLS-RFT Document 59 Filed 01/27/12 Page 1 of 17

RECEIVED NYSCEF: 02/24/2022

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

1:10-cv-1214
 (GLS/RFT)

v.

STATE OF NEW YORK et al.,

Defendants.

APPEARANCES:

OF COUNSEL:

FOR THE PLAINTIFF:

HON. RICHARD J. HARTUNIAN
 United States Attorney
 445 Broadway
 218 James T. Foley U.S. Courthouse
 Albany, NY 12207-2924

BARBARA D. COTTRELL
 THOMAS SPINA, JR.
 Assistant U.S. Attorneys

United States Dept. of Justice
 Civil Rights Division
 950 Pennsylvania Ave. NW
 Washington, D.C. 20530

RICHARD A. DELLHEIM, ESQ.
 RISA A. BERKOWER, ESQ.

FOR THE DEFENDANTS:

State of New York
 HON. ERIC T. SCHNEIDERMAN
 New York State Attorney General
 Albany Department of Law
 The Capitol
 Albany, NY 12224

JEFFREY M. DVORIN
 BRUCE J. BOIVIN
 Assistant Attorney Generals

Board of Elections
 New York State Bd. of Elections
 Office of Special Counsel
 40 Steuben Street

KIMBERLY A. GALVIN, ESQ.
 PAUL M. COLLINS, ESQ.

Albany, NY 12207-1650

Gary L. Sharpe
Chief Judge

MEMORANDUM-DECISION AND ORDER

I. Introduction

Nothing is more critical to a vibrant democratic society than citizen participation in government through the act of voting. It is unconscionable to send men and women overseas to preserve our democracy while simultaneously disenfranchising them while they are gone. To some extent, that is precisely what New York has done. Having had ample opportunity to correct the problem, it has failed to find the political will to do so. While matters of comity ordinarily counsel federal courts to refrain from becoming embroiled in state election schemes, New York has left the court no choice. If federally-guaranteed voting rights are to be protected, the court must act.

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) of 1986, 42 U.S.C. §§ 1973ff to 1973ff-7, as amended by the Military and Overseas Voter Empowerment (MOVE) Act, Pub. L. No. 111-84, subtitle H, §§ 575-589, 123 Stat. 2190, 2318-2335 (2009) protects

the federally-guaranteed voting rights of New York's military and overseas voters. Since at least 2010, New York has recognized that its voting laws are not compliant with UOCAVA's federal mandate. Accordingly, the State entered a Consent Decree on October 19, 2010. (*See* Dkt. No. 9.) Among other things, it agreed to amend its law to ensure future compliance with UOCAVA and agreed to take certain steps to correct UOCAVA violations. (*See* Consent Decree Terms, *id.*) Furthermore, the State transmitted additional absentee ballots after October 1, 2010—that were unknown to the court at the time it entered the Decree—which constituted additional UOCAVA violations that fell beyond the scope of the relief ordered in the Consent Decree. (*See id.*)

Now pending is the United States' motion seeking permanent and supplemental relief to ensure New York's primary election date complies with UOCAVA and to address the additional violations found subsequent to the Decree. (*See* Dkt. No. 16.) For the reasons that follow, the motion is granted.

II. Background

On October 12, 2010, the United States filed this action to remedy violations of UOCAVA. UOCAVA guarantees active duty members of the

uniformed services (and their spouses and dependents), and United States citizens residing overseas, the right “to vote by absentee ballot in general, special, primary, and runoff elections for Federal office.” 42 U.S.C. § 1973ff-1(a)(1). New York is responsible for complying with UOCAVA and ensuring that validly-requested absentee ballots are sent to UOCAVA voters in accordance with its terms. 42 U.S.C. §§ 1973ff-1 & 1973ff-6(6).

New York’s statutorily-prescribed non-presidential federal primary election date prevents it from complying with UOCAVA’s ballot transmission deadline of forty-five (45) days prior to a federal general election. On August 27, 2010, the Secretary of Defense granted New York a hardship waiver for the November 2, 2010 federal general election on that basis. The waiver exempted New York from complying with UOCAVA’s ballot transmission deadline of September 18, 2010. Thus, the waiver extended New York’s UOCAVA ballot transmission deadline until October 1, 2010. The waiver was granted based in part upon New York’s representations that all ballots would be transmitted by October 1, 2010.

However, New York failed to transmit all UOCAVA ballots by October 1, 2010, prompting the United States to contact State officials. During these communications, New York represented that at least thirteen (13)

counties transmitted UOCAVA ballots after October 1, 2010, but stated that all UOCAVA ballots had been transmitted no later than October 10, 2010.

On October 19, 2010, and based on these representations, this court entered the Decree to remedy these UOCAVA violations. (See Dkt. No. 9.) The Decree required New York to accept as valid all UOCAVA ballots that were properly executed and postmarked or showing a date of endorsement of receipt by another agency of the United States government by November 1, 2010, and that were received by New York's election officials by November 24, 2010 and otherwise valid. The Decree left open the issue of additional relief should New York fail to take necessary measures to ensure future UOCAVA compliance. The Decree also contemplated supplemental relief should additional UOCAVA violations be discovered.

III. Discussion

A. Primary Election Date

Determining an UOCAVA-complaint date for New York's 2012 primary election requires consideration of a multitude of positions, all of which were presented by New York. While the Election Commissioners' Association (ECA), the State Senate, which was granted amicus status,

and the State Assembly¹ expressed their views, the Governor did not take a position.

Specifically, the ECA and State Assembly urge the court to move the September Primary to the fourth Tuesday in June in order to reliably meet the mandates of UOCOVA. The ECA contends that an August primary election does not provide sufficient time to deal with the foreseeable obstacles in certifying a primary election result or the ballot. Thus, ECA claims that an August election would potentially disenfranchise military and overseas voters.

On the other hand, the State Senate seeks an August primary date because it would be the least disruptive to the current, and long-standing, September primary system. In so arguing, the Senate urges the court to consider the economic implications of the primary date, the hardship of candidates to obtain signatures in the winter months, and that June is at the end of the legislative session. More specifically, the Senate points out that a June primary would force its members to have to weigh their elected responsibilities against the need for political presence in their district.

Having considered the parties submissions, and considering their

¹ Not a party to this litigation and did not seek amicus status.

contentions with care, the court concludes that the fourth Tuesday in June for the non-presidential primary is in the best interest of the State.

However, this decision by no means precludes New York from reconciling their differences and selecting a different date, so long as the new date fully complies with UOCAVA. The court fully recognizes that a permanent primary date is best left to New York, but has acted as it must to preserve federally protected voting rights.

B. Additional UOCAVA violations

Following the entry of the Decree, the court has been informed that at least thirty-six (36) of New York's sixty-two (62) counties transmitted UOCAVA ballots after October 1, 2010. Furthermore, at least thirteen (13) counties transmitted UOCAVA ballots after the October 10, 2010, transmission date stipulated in the Decree. Since there appears to be no dispute on the subsequent violations, the court grants the relief sought by the United States to determine the extent of the UOCAVA violations and the proposed remedy to rectify those violations.

IV. Conclusion

WHEREFORE, for the foregoing reasons, it is hereby

ORDERED that the United States' motion for permanent and

supplemental relief (Dkt. No. 16) is **GRANTED**; and it is further

ORDERED that:

- (1) **Notwithstanding any current state law or administrative procedure to the contrary, New York shall conduct its 2012 non-presidential federal primary election on a date no later than 35 days prior to the 45-day advance deadline set by the MOVE Act for transmitting ballots to the State's military and overseas voters, *i.e.*, at least 80 days before the November 6, 2012 federal general election. In 2012, that date shall be June 26, 2012.**
- (2) **In subsequent even-numbered years, New York's non-presidential federal primary date shall be the fourth Tuesday of June, unless and until New York enacts legislation resetting the non-presidential federal primary election for a date that complies fully with all UOCAVA requirements, and is approved by this court.**
- (3) For the purposes of determining the date and time for performing any act prescribed by any law and/or administrative procedure applicable to New York's non-presidential federal

primary, such non-presidential federal primary election date shall be deemed to be held on the dates provided in paragraphs (1) and (2) above.

- (4) The New York State Board of Elections (“NYSBOE”) shall, within five (5) days of this Order, provide the court with a proposed non-presidential federal primary election calendar for all statutory and administrative election-related deadlines based upon the non-presidential federal primary election date set by the court. The United States shall have five (5) days to respond. Once approved by the court, the NYSBOE shall have ten (10) days to take all steps necessary to adopt and promulgate this non-presidential federal primary calendar.
- (5) Having promulgated an approved non-presidential federal primary election calendar, the NYSBOE shall take all steps necessary to ensure that such non-presidential federal primary election calendar is implemented by and complied with by local boards of election. To this end, and to ensure future UOCAVA compliance, the parties shall confer as to an appropriate schedule for defendants to provide pre-election reporting to the

United States with respect to the State's UOCAVA compliance.

- (6) Within fourteen (14) days of this Order, the parties, having conferred, shall provide the court with a list of those county boards of elections, if any, to be re-surveyed concerning UOCAVA ballots from the 2010 federal general election, along with an explanation of any differences between the parties' proposals.
- (7) If necessary and appropriate, the court will determine the list of counties to be re-surveyed. Within seven (7) days of that determination, the NYSBOE shall transmit the attached questionnaire concerning ballots transmitted to voters in the 2010 federal general election pursuant to UOCAVA to each county board of elections on that list with instructions for the chief official or officials of each county board to certify the accuracy of the board's responses to the questionnaire.
- (8) Defendants shall instruct each affected county board of elections that each completed questionnaire must be returned to the NYSBOE within thirty (30) days of its receipt. After consulting with counsel for the United States, the NYSBOE

shall file all completed questionnaires with this court within sixty (60) days of this Order, along with an accurate summary of the survey results, and, if necessary, an explanation as to why the survey results are incomplete. The United States may respond to this filing within ten (10) days. This court retains jurisdiction to take all appropriate steps to ensure the completeness and accuracy of the information provided by defendants and the county boards of elections.

- (9) After the actions in paragraphs (7) and (8) above are complete, defendants shall ensure that local election officials in New York State take such steps as are necessary to count as validly-cast ballots in the November 2, 2010 federal general election all those ballots cast for federal offices, including Federal Write-in Absentee Ballots, requested up to and including October 10, 2010 and transmitted to overseas and military voters after that date but received by such election officials after November 24, 2010, so long as such ballots are executed and postmarked, or show a dated endorsement of receipt by another agency of the United States government (or in the case of military voters, are

signed and dated by the military voter and one witness thereto) by November 1, 2010 and are otherwise valid under New York law.

- (10) Within twenty (20) days of the completion of the actions required by paragraphs (7)-(9) above, defendants shall, after consulting with the United States, present a plan to the court detailing the procedures it will employ to count such ballots and certify the votes for federal offices. Defendants shall conclude ballot counting and recertification of all affected ballots within thirty (30) days after the court approves the ballot counting and recertification plan.
- (11) Defendants shall take all reasonable steps to notify all affected voters of the terms of this Order and that their votes were counted in the 2010 federal general election.
- (12) Defendants shall file a report with this court, in a format to be agreed upon by the parties, no later than five (5) days following the completion of any recertification process, detailing the number of UOCAVA absentee ballots, by county, that meet the conditions of this Order and that have been counted for the

November 2, 2010 federal general election. The report will set forth the following information, by county, categorized by absent uniformed services voters with APO/FPO addresses or non-US street addresses; uniformed services voters at a street address within the US; and overseas civilian voters:

- a. The number of absentee ballots requested by UOCAVA voters between October 1, 2010 and October 10, 2010;
- b. The number of absentee ballots requested by UOCAVA voters between October 1, 2010 and October 10, 2010 but sent to such voters after October 10, 2010;
- c. The number of absentee ballots identified in subparagraph (b) that were received from UOCAVA voters later than the close of business on November 24, 2010 and rejected solely for that reason; and
- d. The number of absentee ballots that, pursuant to this Order, have been counted and included in recertified election totals.

- (13) This court shall retain jurisdiction to ensure additional relief as appropriate; and it is further

ORDERED that the Clerk provide a copy of this Memorandum-
Decision and Order to the parties.

IT IS SO ORDERED.

January 27, 2012
Albany, New York



Gary L. Sharpe
Chief Judge
U.S. District Court

Questionnaire

County: _____

Instructions: Each New York county board of elections must answer the following questions. The chief official of the board must sign the responses to these questions and attest to their accuracy under penalty of perjury. Responses must be submitted to the New York State Board of Elections within 30 days of receiving this survey. Please attach additional sheets of paper if necessary to respond completely to each question. All responses will be filed by the State with the U.S. District Court for the Northern District of New York in connection with United States v. New York, et al., No. 1:10-CV-1214 (GLS/RFT) (N.D.N.Y. filed Oct. 12, 2010).

Part I: UOCAVA Ballot Requests

1. Please provide the number of UOCAVA ballot requests received by your county prior to September 18, 2010: _____.
2. Please provide the number of UOCAVA ballot requests received by your county between September 18, 2010 and October 1, 2010: _____.
3. Please provide the number of UOCAVA ballot requests received by your county between October 1, 2010 and October 10, 2010: _____.
4. Please provide the number of UOCAVA ballot requests received by your county after October 10, 2010: _____.

Part II: UOCAVA Ballot Transmittals

1. Please provide the number of UOCAVA ballots that were transmitted to voters (including by electronic transmission) by October 1, 2010: _____.
2. Please provide the number of UOCAVA ballots that were transmitted to voters (including by electronic transmission) between October 1, 2010

and October 10, 2010: _____.

3. Please provide the number of UOCAVA ballots that were transmitted to voters (including by electronic transmission) after October 10, 2010: _____.

a. If ballots were transmitted after October 10, 2010, please provide the following:

i. The number of UOCAVA ballots transmitted after October 10, 2010 that were requested before October 10, 2010: _____.

ii. The number of UOCAVA ballots transmitted after October 10, 2010 that were requested after October 10, 2010: _____.

Part III: UOCAVA Ballots Returned to the County

1. Please provide the number of UOCAVA ballots received by the county prior to November 2, 2010: _____.

2. Please provide the number of UOCAVA ballots received by the county between November 2, 2010 and November 24, 2010: _____.

3. Please provide the number of UOCAVA ballots received by the county after November 24, 2010: _____.

Part IV: Rejected UOCAVA Ballots

1. Please provide: a.) the number of UOCAVA ballots that were received prior to November 2, 2010 that were rejected and not counted: _____; and b.) the reason(s) for rejection of each of those ballots:

2. Please provide: a.) the number of UOCAVA ballots that were

received between November 2, 2010 and November 24, 2010 that were rejected and not counted: _____; and b.) the reason(s) for rejection of each of those ballots:

3. Please provide the number of UOCAVA ballots that were received after November 24, 2010 that were rejected and not counted:

_____.

a. Were any ballots received after November 24, 2010 requested by October 10, 2010 and transmitted to the voter after that date?

_____.

i. If yes, please provide the number of such ballots: _____.

ii. If yes, please provide the number of such ballots that were not counted only because they were received after November 24, 2010:

_____.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signature:

Printed name:

Title:

Date: _____

**ANSWER TO PETITION OF RESPONDENTS GOVERNOR KATHY HOCHUL AND
LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE BRIAN A. BENJAMIN,
DATED FEBRUARY 24, 2022 [962 - 968]**

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:30 PM

NYSCEF DOC. NO. 83

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN**

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Petitioner,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

**Governor Hochul's and
Lt. Governor Benjamin's
Answer to Petition**

Index No. E2022-0116CV

McAllister, J.S.C.

Return Date:
March 3, 2022

The respondents, Governor of New York State Kathy Hochul and Lieutenant Governor and President of the Senate of New York State Brian A. Benjamin (the "Executive Respondents") answer the Petition as follows:

1. Admit paragraphs 24, 25, 26, 27, 28, 29, 32, 33, 34, 35, 36, 44, 46, 47, 48, 49, 50, 52, 53, 54, 56, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 74, 76, 98, 143, 144, 159, 205, and 206.
2. Upon information and belief, admit paragraphs 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 75, 79, 80, 83, 85, 86, 90, 93, 97, 101, 103, 107, 142, 147, and 162.
3. Deny paragraphs 1, 6, 7, 8, 9, 38, 39, 42, 51, 57, 77, 104, 110, 111, 112, 114, 115, 118, 120, 122, 123, 124, 133, 134, 137, 138, 139, 140, 146, 148, 150, 153, 154, 158, 160, 165, 166,

174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 189, 190, 192, 193, 195, 196, 197, 202, 203, 204, 207, 212, 213, 215, 219, 220, 221, 222, 223, 224, 225, and 226.

4. Deny knowledge or information sufficient to form a belief as to truth of the allegations contained in paragraphs 81, 82, 84, 87, 88, 89, 91, 94, 95, 96, 99, 100, 102, 106, 108, 113, 116, 119, 125, 126, 127, 128, 129, 130, 132, 141, 145, 156, 157, 161, 169, 170, 171, 172, and 194 and therefore deny the same.

5. State paragraphs 30, 31, 41, 187, 188, 199, 200, 201, 209, 210, and 211 contain legal conclusions to which no response is required, but to the extent a response is required deny the same.

6. Regarding paragraph 2, deny “exclusive” and the final sentence in said paragraph and admit the remaining allegations.

7. Regarding paragraph 3 deny the State “bragged about these” and admit the remaining allegations.

8. Regarding paragraph 4, admit there was a proposed Constitutional amendment and deny the remaining allegations.

9. Regarding paragraph 5, deny “exclusive” and admit the remaining allegations.

10. Regarding paragraph 37, deny LATFOR is a partisan body that produced partisan maps and admit the remaining allegations.

11. Regarding paragraph 40, deny “significant leeway to gerrymander for partisan and incumbent gain” and admit the remaining allegations.

12. Regarding paragraph 43, deny “exclusive” and admit the remaining allegations.

13. Regarding paragraph 45, deny “against the Legislature’s continued gerrymandering practices” and admit the remaining allegations.

14. Regarding paragraph 55, deny “would have gutted the 2014 constitutional reforms” and admit the remaining allegations.

15. Regarding paragraph 58 deny “attempts to avoid the Constitution’s limitations” and “notwithstanding the expressed desires of the People of this State” and admit the remaining allegations.

16. Regarding paragraph 73, deny “exclusive” and admit the remaining allegations.

17. Regarding paragraph 78, deny the first sentence and admit the remaining allegations.

18. Regarding paragraph 92, deny “partisan” and upon information and belief admit the remaining allegations.

19. Regarding paragraph 105, deny “turning a blind eye to the mandatory and exclusive constitutional process for redistricting established in Article III, Section 4” and admit the remaining allegations.

20. Regarding paragraph 109, admit the enacting legislation had a “notwithstanding clause” and deny the remaining allegations.

21. Regarding paragraph 117, deny “partisan” and the last sentence and admit the remaining allegations.

22. Regarding paragraph 121, deny “capturing overwhelmingly Democrat-voting towns along the shore” and admit the remaining allegations.

23. Regarding paragraph 131, deny “thereby drastically changing the political composition of this district, providing the Democrats a drastically increased change of flipping it” and admit the remaining allegations.

24. Regarding paragraph 135, deny “Democratic strongholds” and “in order to ‘crack’

them out of Congressional District 18” and admit the remaining allegations.

25. Regarding paragraph 136, deny “awkwardly connected” and “neutralizing these Republican votes” and admit the remaining allegations.

26. Regarding paragraph 149, deny “Republican communities” and “to add Democrat voters” and admit the remaining allegations.

27. Regarding paragraph 151, deny “to pick up additional Democratic voters there” and admit the remaining allegations.

28. Regarding paragraph 152, deny “to pick up the Democrat-voting city of Utica” and admit the remaining allegations.

29. Regarding paragraph 155, deny “thereby packing additional Republican voters” and “eliminating their ability to make surrounding districts more competitive for Democratic candidates” and admit the remaining allegations.

30. Regarding paragraph 163, deny “while notably avoiding certain portions of Monroe and Ontario counties” and admit the remaining allegations.

31. Regarding paragraph 164, deny “with little or nothing in common” and admit the remaining allegations.

32. Regarding paragraph 167, deny “egregious gerrymandering” and “with only slight modifications not related to their gerrymandering efforts” and admit the remaining allegations.

33. Regarding paragraph 168, deny “egregious gerrymandering” and admit the remaining allegations.

34. Regarding paragraph 173, deny “thereby blessing her fellow Democrats’ blatant gerrymandering efforts” and admit the remaining allegations.

35. Regarding paragraph 191, deny “leaving the Legislature with no p=maps to act on within the scope of its limited constitutional role” and admit the remaining allegations.

36. Regarding paragraph 214, admit Governor Hochul signed the congressional map into law and respectfully refers the Court to the cited New York Times article for its content.

37. Regarding paragraph 217, admit that is what the Petitioner seeks but deny they are entitled to such relief.

38. Regarding paragraph 218, admit New York Courts must properly construe the New York Constitution and deny the remaining allegations.

39. State paragraphs 186, 198, 208, and 216 refer to other paragraphs in the Petition and answer said paragraphs as the referred to paragraphs were answered.

40. Deny every allegation not otherwise specifically addressed.

1st Affirmative Defense

41. The Court does not have personal jurisdiction over Governor Hochul or Lt. Governor Benjamin.

2nd Affirmative Defense

42. The 2022 enacted New York Congressional district maps are proper.

3rd Affirmative Defense

43. The 2022 enacted New York Congressional district maps were properly enacted.

4th Affirmative Defense

44. The Governor and Lt. Governor are entitled to immunity under the NY Constitution’s speech and debate clause and common law.

5th Affirmative Defense

45. This matter is nonjusticiable.

6th Affirmative Defense

46. The Petition fails to state a claim upon which relief can be granted.

The Return

47. The Executive Respondents submit the Return in this matter, which consists of the Affirmation of Heather McKay, Esq., sworn to February 24, 2022, with exhibits, in opposition to the Petition and in support of the Executive Respondents' Motion to Dismiss, and the Executive Respondents' Memorandum of Law in opposition to the Petition and in support of the Executive Respondents' Motion to Dismiss, copies of which will be filed with the New York State Courts Electronic Filing System, and said documents are incorporated by reference herein and made a part hereof.

48. The Executive Respondents further join in and adopt all arguments made by co-Respondents in this action.

WHEREFORE, the Executive Respondents pray that judgment be entered dismissing the Petition in all respects and that the Executive Respondents be awarded reasonable costs and attorney fees and for such further relief as is proper and equitable.

Dated: February 24, 2022

LETITIA JAMES
Attorney General for the State of New York
Attorney for Respondents Governor Kathy Hochul and Lieutenant Governor and President of the Senate Brian A. Berjamine

s/ Matthew D. Brown
Matthew D. Brown
Assistant Attorney General
NYS Office of the Attorney General
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ANSWER OF RESPONDENTS SPEAKER OF THE ASSEMBLY CARL HEASTIE AND THE ASSEMBLY MAJORITY, DATED FEBRUARY 24, 2022 [969 - 990]

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:54 PM

NYSCEF DOC. NO. 85

INDEX NO. E2022-0116CV

RECEIVED NYSCEF: 02/24/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND
MARIANNE VOLANTE,

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY
LEADER AND PRESIDENT PRO TEMPORE OF
THE SENATE ANDREA STEWART-COUSINS,
SPEAKER OF THE ASSEMBLY CARL HEASTIE,
NEW YORK STATE BOARD OF ELECTIONS, AND
THE NEW YORK STATE LEGISLATIVE TASK
FORCE ON DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT

Respondents.

Index No. E2022-0116CV

(J. McAllister)

ANSWER

Respondents Speaker of the Assembly Carl Heastie ("Assembly Speaker") and the Assembly Majority, by their attorneys, Graubard Miller, answer the Petition as follows:

- 1. Deny the allegation of paragraph 1 of the Petition.
2. Deny the allegation of paragraph 2 of the Petition except admit that Sections 4 and 5 of Article III of the New York Constitution were amended in 2014.
3. As and for their answer to the allegation of paragraph 3 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

4. Deny the allegation of paragraph 4 of the Petition.
5. Deny the allegation of paragraph 5 of the Petition except admit that the proposed constitutional amendment referred to therein did not pass.
6. Deny the allegation of paragraph 6 of the Petition.
7. Deny the allegation of paragraph 7 of the Petition.
8. Deny the allegation of paragraph 8 of the Petition.
9. Deny the allegation of paragraph 9 of the Petition.
10. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 10 of the Petition.
11. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 11 of the Petition.
12. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 12 of the Petition.
13. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 13 of the Petition.
14. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 14 of the Petition.
15. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 15 of the Petition.
16. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 16 of the Petition.
17. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 17 of the Petition.

18. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 18 of the Petition.

19. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 19 of the Petition.

20. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 20 of the Petition.

21. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 21 of the Petition.

22. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 22 of the Petition.

23. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 23 of the Petition.

24. Decline to respond to the allegation of paragraph 24 of the Petition in that said allegation is not directed to Assembly Speaker or the Assembly majority.

25. Decline to respond to the allegation of paragraph 25 of the Petition in that said allegation is not directed to Assembly Speaker or the Assembly majority.

26. Decline to respond to the allegation of paragraph 26 of the Petition in that said allegation is not directed to Assembly Speaker or the Assembly majority.

27. Admit the allegation of paragraph 27 of the Petition.

28. Decline to respond to the allegation of paragraph 28 of the Petition in that said allegation is not directed to Assembly Speaker or the Assembly majority.

29. Decline to respond to the allegation of paragraph 29 of the Petition in that said allegation is not directed to Assembly Speaker or the Assembly majority.

30. Decline to respond to the allegation of paragraph 30 of the Petition in that said paragraph sets forth only a legal conclusion and not an averment of fact.

31. Decline to respond to the allegation of paragraph 31 of the Petition in that said paragraph sets forth only a legal conclusion and not an averment of fact.

32. As and for their answer to the allegation of paragraph 32 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

33. As and for their answer to the allegation of paragraph 33 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

34. As and for their answer to the allegation of paragraph 34 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

35. Deny the allegation of paragraph 35 of the Petition except admit that at all times before and after 2014 the Legislature has had responsibility for redistricting.

36. As and for their answer to the allegation of paragraph 36 of the Petition, respectfully refer the Court to the relevant sections of the New York Constitution referenced by implication therein for the contents thereof.

37. Deny the allegation of paragraph 37 of the Petition except admit that the Speaker of the Assembly appoints certain members of LATFOR.

38. As and for their answer to the allegation of paragraph 38 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

39. As and for their answer to the allegation of paragraph 39 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

40. As and for their answer to the allegation of paragraph 40 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

41. As and for their answer to the allegation of paragraph 41 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

42. Deny the allegation of paragraph 42 of the Petition.

43. Deny the allegation of paragraph 43 of the Petition.

44. As and for their answer to the allegation of paragraph 44 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

45. Deny the allegation of paragraph 45 of the Petition.

46. As and for their answer to the allegation of paragraph 46 of the Petition, respectfully refer the Court to the relevant sections of the New York Constitution referenced by implication therein for the contents thereof and otherwise deny the allegation of said paragraph.

47. As and for their answer to the allegation of paragraph 47, respectfully refer the Court to the document referenced therein for the contents thereof.

48. As and for their answer to the allegation of paragraph 48 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

49. As and for their answer to the allegation of paragraph 49 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

50. As and for their answer to the allegation of paragraph 50 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

51. Deny the allegation of paragraph 51 of the Petition.

52. As and for their answer to the allegation of paragraph 52 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

53. As and for their answer to the allegation of paragraph 53 of the Petition, respectfully refer the Court to the relevant sections of the New York Constitution referenced by implication therein for the contents thereof and otherwise deny the allegation of said paragraph.

54. As and for their answer to the allegation of paragraph 54 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

55. Deny the allegation of paragraph 55 of the Petition.

56. As and for their answer to the allegation of paragraph 56 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

57. Deny the allegation of paragraph 57 of the Petition.

58. As and for their answer to the allegation of paragraph 58 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

59. As and for their answer to the allegation of paragraph 59 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof.

60. Deny the allegation of paragraph 60 of the Petition.

61. As and for their answer to the allegation of paragraph 61 of the Petition, admit that between 2010 and 2020 the population within New York's congressional districts changed and otherwise deny the allegation of said paragraph.

62. Admit the allegation of paragraph 62 of the Petition.
63. Deny the allegation of paragraph 63 of the Petition, except admit that the prior congressional map does not comply with the new population target.
64. Deny the allegation of paragraph 64 of the Petition except respectfully refer the Court to the case referenced therein for the terms thereof.
65. Admit the allegation of paragraph 65 of the Petition.
66. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 66 of the Petition.
67. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 67 of the Petition.
68. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 68 of the Petition.
69. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 69 of the Petition.
70. As and for their answer to the allegation of paragraph 70 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.
71. As and for their answer to the allegation of paragraph 71 of the Petition, respectfully refer the Court to the U.S. Census Bureau release referenced therein for the contents thereof but admit that New York presently has 26 congressional districts.
72. As and for their answer to the allegation of paragraph 72 of the Petition, respectfully refer the Court to the U.S. Census Bureau release referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

73. As and for their answer to the allegation of paragraph 73 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

74. Admit the allegation of paragraph 74 of the Petition.

75. As and for their answer to the allegation of paragraph 75 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, admit that David Imamura, Eugene Bengler, John Fleteau, and Elaine Frazier, and Ivelisse Cuevas-Molina are members of the IRC, and otherwise deny the allegation of said paragraph

76. As and for their answer to the allegation of paragraph 76 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, admit that Jack Martins, John Conway, Charles Nesbitt, Willis Stephens, and Ross Brady are members of the IRC, and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

77. Deny the allegation of paragraph 77 of the Petition.

78. As and for their answer to the allegation of paragraph 78 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

79. As and for their answer to the allegation of paragraph 79 of the Petition, lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph, except admit that IRC held a series of hearings to solicit public testimony about the redistricting process.

80. As and for their answer to the allegation of paragraph 89 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, admit

that members of the IRC released initial map drafts, and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

81. As and for their answer to the allegation of paragraph 81 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

82. As and for their answer to the allegation of paragraph 82 of the Petition, respectfully refer the Court to the alleged statement referenced therein for the contents thereof and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

83. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 83 of the Petition.

84. As and for their answer to the allegation of paragraph 84 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

85. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 85 of the Petition.

86. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 86 of the Petition.

87. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 87 of the Petition.

88. As and for their answer to the allegation of paragraph 88 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

89. As and for their answer to the allegation of paragraph 89 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegation of said paragraph.

90. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 90 of the Petition.

91. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 91 of the Petition.

92. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 92 of the Petition.

93. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 93 of the Petition, except admit that two redistricting plans were sent to the Assembly.

94. Deny the allegation of paragraph 94 of the Petition except admit that the plans submitted to the Assembly were not adopted by the Assembly.

95. As and for their answer to the allegation of paragraph 95 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, admit that the plans submitted to the Assembly were not adopted by the Assembly and otherwise deny the allegation of said paragraph.

96. As and for their answer to the allegation of paragraph 96 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, admit that the plans submitted to the Assembly were not adopted by the Assembly and otherwise deny the allegation of said paragraph.

97. Admit the allegation of paragraph 97 of the Petition.

98. As and for their answer to the allegation of paragraph 98 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

99. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 99 of the Petition.

100. As and for their answer to the allegation of paragraph 100 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof, except admit that the Assembly Speaker appointed Kenneth Zebrowski to be the temporary co-chair of LATFOR.

101. Admit the allegation of paragraph 101 of the Petition.

102. Lack knowledge or information sufficient to form a belief as to the truth of the allegation of paragraph 102 of the Petition, except deny that Democratic members of IRC “refus[ed] to engage with anything other than their partisan maps.”

103. As and for their answer to the allegation of paragraph 100 of the Petition, admit that the IRC did not submit a second redistricting plan or plans to the Legislature for a vote and otherwise deny the allegation of said paragraph.

104. Deny the allegation of paragraph 104 of the Petition.

105. Deny the allegation of paragraph 105 except admit that the Legislature exercised their constitutional right and duty to adopt a redistricting plan.

106. As and for their answer to the allegation of paragraph 106 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

107. As and for their answer to the allegation of paragraph 107 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph, except admit that the Legislature exercised their constitutional right and duty to adopt a redistricting plan.

108. Deny the allegation of paragraph 108 of the Petition.

109. As and for their answer to the allegation of paragraph 109 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

110. Deny the allegation of paragraph 110 of the Petition.

111. As and for their answer to the allegation of paragraph 111 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

112. As and for their answer to the allegation of paragraph 112 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

113. Deny the allegation of paragraph 113 of the Petition.

114. Deny the allegation of paragraph 114 of the Petition.

115. Deny the allegation of paragraph 115 of the Petition.

116. Deny the allegation of paragraph 116 of the Petition.

117. Deny the allegation of paragraph 117 of the Petition.

118. Deny the allegation of paragraph 118 of the Petition.

119. Deny the allegation of paragraph 119 of the Petition.

120. As and for their answer to the allegation of paragraph 120 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

121. As and for their answer to the allegation of paragraph 121 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

122. Deny the allegation of paragraph 122 of the Petition.

123. Deny the allegation of paragraph 123 of the Petition.

124. Deny the allegation of paragraph 124 of the Petition.

125. Deny the allegation of paragraph 125 of the Petition

126. Deny the allegation of paragraph 126 of the Petition

127. Deny the allegation of paragraph 127 of the Petition.

128. As and for their answer to the allegation of paragraph 128 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

129. As and for their answer to the allegation of paragraph 129 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

130. As and for their answer to the allegation of paragraph 130 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

131. As and for their answer to the allegation of paragraph 131 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

132. As and for their answer to the allegation of paragraph 132 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

133. Deny the allegation of paragraph 133 of the Petition.

134. Deny the allegation of paragraph 134 of the Petition.

135. As and for their answer to the allegation of paragraph 135 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

136. Deny the allegation of paragraph 136 of the Petition.

137. Deny the allegation of paragraph 137 of the Petition.

138. As and for their answer to the allegation of paragraph 138 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

139. Deny the allegation of paragraph 139 of the Petition.

140. Deny the allegation of paragraph 140 of the Petition.

141. Deny the allegation of paragraph 141 of the Petition.

142. As and for their answer to the allegation of paragraph 142 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

143. As and for their answer to the allegation of paragraph 143 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

144. As and for their answer to the allegation of paragraph 144 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

145. As and for their answer to the allegation of paragraph 145 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

146. Deny the allegation of paragraph 146 of the Petition.

147. Deny the allegation of paragraph 147 of the Petition.

148. Deny the allegation of paragraph 148 of the Petition.

149. As and for their answer to the allegation of paragraph 149 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

150. Deny the allegation of paragraph 150 of the Petition.

151. As and for their answer to the allegation of paragraph 151 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

152. As and for their answer to the allegation of paragraph 152 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

153. Deny the allegation of paragraph 153 of the Petition.

154. Deny the allegation of paragraph 154 of the Petition.

155. As and for their answer to the allegation of paragraph 155 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

156. Deny the allegation of paragraph 156 of the Petition.

157. Deny the allegation of paragraph 157 of the Petition.

158. Deny the allegation of paragraph 158 of the Petition.

159. As and for their answer to the allegation of paragraph 159 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

160. Deny the allegation of paragraph 160 of the Petition.

161. Deny the allegation of paragraph 161 of the Petition.

162. As and for their answer to the allegation of paragraph 162 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

163. As and for their answer to the allegation of paragraph 163 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

164. As and for their answer to the allegation of paragraph 164 of the Petition, respectfully refer the Court to the map referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

165. Deny the allegation of paragraph 165 of the Petition.

166. Deny the allegation of paragraph 166 of the Petition.

167. As and for their answer to the allegation of paragraph 167 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

168. Deny the allegations of paragraph 168 of the Petition, except admit that Republican legislators and Assemblymembers Simcha Eichenstein and Marcela Mitaynes voted against the congressional map.

169. Deny the allegation of paragraph 169 of the Petition.

170. As and for their answer to the allegation of paragraph 170 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

171. As and for their answer to the allegation of paragraph 171 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

172. As and for their answer to the allegation of paragraph 172 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

173. Deny the allegation of paragraph 173 of the Petition except admit that Governor Hochul signed the congressional redistricting plan into law.

174. Deny the allegation of paragraph 174 of the Petition.

175. Deny the allegation of paragraph 175 of the Petition.

176. Deny the allegation of paragraph 176 of the Petition.

177. Deny the allegation of paragraph 177 of the Petition.

178. Deny the allegation of paragraph 178 of the Petition.

179. Deny the allegation of paragraph 179 of the Petition.
180. Deny the allegation of paragraph 180 of the Petition.
181. Deny the allegation of paragraph 181 of the Petition except lack knowledge of information sufficient to form a belief as to where Petitioners reside.
182. Deny the allegation of paragraph 182 of the Petition except lack knowledge of information sufficient to form a belief as to where Petitioners reside.
183. Deny the allegation of paragraph 183 of the Petition except lack knowledge of information sufficient to form a belief as to where Petitioners reside.
184. Deny the allegation of paragraph 184 of the Petition except lack knowledge of information sufficient to form a belief as to where Petitioners reside.
185. Deny the allegation of paragraph 185 of the Petition except lack knowledge of information sufficient to form a belief as to how Petitioners vote.
186. As and for their answer to the allegation of paragraph 186 of the Petition, repeat their answers to the allegations of paragraphs 1 through 185 of the Petition as though set forth at length herein.
187. As and for their answer to the allegation of paragraph 187 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.
188. As and for their answer to the allegation of paragraph 188 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.
189. As and for their answer to the allegation of paragraph 189 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.
190. Deny the allegation of paragraph 190 of the Petition.

191. Admit the allegation of paragraph 191 of the Petition except deny that the Legislature has a “limited constitutional role,” as alleged therein.

192. Deny the allegation of paragraph 192 of the Petition.

193. Deny the allegation of paragraph 193 of the Petition.

194. Deny the allegation of paragraph 194 of the Petition.

195. Deny the allegation of paragraph 195 of the Petition.

196. Deny the allegation of paragraph 196 of the Petition.

197. Deny the allegation of paragraph 197 of the Petition.

198. As and for their answer to the allegation of paragraph 198 of the Petition, repeat their answers to the allegations of paragraphs 1 through 197 of the Petition as though set forth at length herein.

199. As and for their answer to the allegation of paragraph 199 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

200. As and for their answer to the allegation of paragraph 200 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

201. As and for their answer to the allegation of paragraph 201 of the Petition, respectfully refer the Court to the document referenced therein by implication for the contents thereof and otherwise deny the allegation of said paragraph.

202. Deny the allegation of paragraph 202 of the Petition.

203. Deny the allegation of paragraph 203 of the Petition.

204. Deny the allegation of paragraph 204 of the Petition.

205. Deny the allegation of paragraph 205 of the Petition, except that admit that the 2012 congressional map is inapplicable in 2022 because the 2022 census resulted in the loss of one New York congressional seat.

206. As and for their answer to the allegation of paragraph 206 of the Petition, respectfully refer the Court to the documents referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

207. Deny the allegation of paragraph 207 of the Petition.

208. As and for their answer to the allegation of paragraph 208 of the Petition, repeat their answers to the allegations of paragraphs 1 through 207 of the Petition as though set forth at length herein.

209. As and for their answer to the allegation of paragraph 209 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

210. As and for their answer to the allegation of paragraph 210 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

211. As and for their answer to the allegation of paragraph 211 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof.

212. Deny the allegation of paragraph 212 of the Petition.

213. Deny the allegation of paragraph 213 of the Petition.

214. As and for their answer to the allegation of paragraph 214 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

215. Deny the allegation of paragraph 215 of the Petition.

216. As and for their answer to the allegation of paragraph 216 of the Petition, repeat their answers to the allegations of paragraphs 1 through 215 of the Petition as though set forth at length herein.

217. Decline to respond to the allegation of paragraph 217 of the Petition in that said paragraph set forth only a legal conclusion and not an averment of fact.

218. Admit the allegation of paragraph 218 of the Petition in that it is always imperative that New York courts construe the law properly.

219. As and for their answer to the allegation of paragraph 219 of the Petition, respectfully refer the Court to the document referenced therein for the contents thereof and otherwise deny the allegation of said paragraph.

220. Deny the allegation of paragraph 220 of the Petition.

221. Deny the allegation of paragraph 221 of the Petition.

222. Deny the allegation of paragraph 222 of the Petition.

223. Deny the allegation of paragraph 223 of the Petition.

224. Deny the allegation of paragraph 224 of the Petition.

225. Deny the allegation of paragraph 225 of the Petition.

226. Deny the allegation of paragraph 226 of the Petition.

AFFIRMATIVE DEFENSES

1. The Court lack subject matter jurisdiction over the claims set forth in the Petition.

2. Petitioners lack standing to assert the claims set forth in the Petition.

3. The claims set forth in the Petition are nonjusticiable.

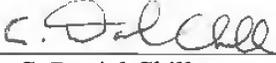
WHEREFORE, Respondents demands judgment as follows:

A. Dismissal of the Petition with prejudice;

- B. The costs and disbursements of the proceeding; and
- C. Such other and further relief as the Court deems just and equitable.

Dated: New York, New York
February 24, 2022

GRAUBARD MILLER

By: 
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Speaker of the Assembly Carl Heastie
and the Assembly majority

Education, Employment, and Qualifications

3. I am an associate professor of political science at Brigham Young University and faculty fellow at the Center for the Study of Elections and Democracy in Provo, Utah. I received my PhD in political science from Princeton University in 2014 with emphases in American politics and quantitative methods/statistical analyses. My dissertation was awarded the 2014 Carl Albert Award for best dissertation in the area of American Politics by the American Political Science Association.

4. I teach a number of undergraduate courses in American politics and quantitative research methods.¹ These include classes about political representation, congressional elections, statistical methods, and research design. I have worked as an expert witness in several cases in which I have been asked to analyze and evaluate various political and elections-related data and statistical methods. Cases in which I have testified at trial or by deposition are listed in my CV, which is attached as Exhibit A. I have previously provided expert reports in several cases related to voting, redistricting, and election-related issues: *Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants, Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida)*; *Common Cause, et al., Plaintiffs, vs. Lewis, et al., Defendants, Case No. 18-CVS-14001 (Wake County, North Carolina)*; *Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida)*; *Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina)*; *Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia)*; *Georgia Coalition for the People's Agenda,*

¹ The political science department at Brigham Young University does not offer any graduate degrees.

Inc., et al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia); Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE NO. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division); League of Women Voters of Ohio, et al., Relators, v. Ohio Redistricting Commission, et al., Respondents. Case No. 2021-1193 (Supreme Court of Ohio); Harper, et al., Plaintiffs, v. Hall et al., Defendants. Case No. 21-CVS-015426 (Wake County North Carolina); Carter, et al., Petitioners, v. Degraffenreid et al., Respondents. Case No. 464 M.D. 2021 (Commonwealth Court of Pennsylvania). I have also recently testified before the Pennsylvania Legislative Reapportionment Commission regarding the Commission's proposed map for the Pennsylvania House of Representatives.

5. In my position as a professor of political science, I have conducted research on a variety of election- and voting-related topics in American politics and public opinion. Much of my research uses advanced statistical methods for the analysis of quantitative data. I have worked on several research projects that use “big data” that include millions of observations, including several state voter files, campaign contribution lists, and data from the US Census. I have also used geographic information systems and other mapping techniques in my work with political data. Much of this research has been published in peer-reviewed journals. I have published nearly 20 peer-reviewed articles, including in our discipline's flagship journal, *The American Political Science Review* as well as the inter-disciplinary journal, *Science Advances*. My CV, which details my complete publication record is attached as Exhibit A.

6. The analysis and opinions I provide below are consistent with my education, training in statistical analysis, and knowledge of the relevant academic literature. These skills are

well-suited for this type of analysis in political science and quantitative analysis more generally. My conclusions stated herein are based upon my review of the information available to me at this time. I am being compensated at a rate of \$500 per hour. My compensation does not depend in any way on the outcome of the case or on the opinions or testimony that I provide.

Political Geography of New York

7. Scholarship in political science has noted that the spatial distribution of voters throughout a state can have an impact on the partisan outcomes of elections when a state is, by necessity, divided into a number of legislative districts. This is largely the case because Democratic-leaning voters tend to live in urban areas while Republican-leaning voters tend to live in the more rural portions of the country.² This geographic distribution of voters is largely the case in New York as well. Neither expert report submitted by the plaintiffs discusses the political geography of New York in any systematic way. Mr. LaVigna states that he reviewed the districts “in light of New York’s political geography” (pg 2. LaVigna Report), however, he provides no data or systematic analysis to indicate what he means by this.

8. Mr. LaVigna provides no quantitative analysis of the Enacted Plan. There are a variety of locations in which he asserts that particular districts are “Republican-leaning” or “Democratic-leaning,” however there is no indication of what data or evidence he used to arrive at these conclusions. Furthermore, in concluding that the plan is a partisan gerrymander, he often uses the phrase “no coherent explanation” for the shape of the districts. However, he does not

² See for example Stephanopoulos, N. O. and McGhee, E. M., Partisan Gerrymandering and the Efficiency Gap, *The University of Chicago Law Review* 82: 831-900, (2015); Chen, J. and Rodden, J., Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures, *Quarterly Journal of Political Science* 8: 239-269, (2013); Nall, C., The Political Consequences of Spatial Policies: How Interstate Highways Facilitated Geographic Polarization, *Journal of Politics*, 77(2): 394-406, (2015); Gimple, J. and Hui, I., Seeking politically compatible neighbors? The role of neighborhood partisan composition in residential sorting, *Political Geography* 48: 130-142 (2015); Bishop, B., *The Big Sort: Why the Clustering of Like-Minded America is Tearing Us Apart*, Houghton Mifflin Press (2008); and Jacobson, G. C., and Carson, J. L., *The Politics of Congressional Elections*, 9th ed. Lanham, MD: Rowman and Littlefield (2016).

compare the plan to any other alternative plan, simulated or otherwise. It is therefore impossible to know how he arrives at the conclusion that there is “no coherent explanation” for the composition of the districts aside from simply asserting that it is the case. The analysis he conducts is fundamentally qualitative and subjective in nature.

9. There is nothing wrong, per se, with a qualitative approach to evaluating a state’s map. However, qualitative research requires the same standards and rigor as quantitative research. King, Keohane, and Verba (2021), arguably the most influential recent work on qualitative research, describe the need for rigorously defined standards in qualitative research as the following:

We argue that nonstatistical research will produce more reliable results if researchers pay attention to the rules of scientific inference---rules that are sometimes more clearly stated in the style of quantitative research....Indeed the distinctive characteristic that sets social science apart from casual observation is that social science seeks to arrive at valid inferences by the systematic use of well-established procedures of inquiry (pg. 4).³

10. From my review of Mr. LaVigna’s analysis, there is no systematic process by which he determines if a district constitutes a gerrymander or not. Mr. LaVigna does not describe any methods, data, or processes that would be consistent with analysis in political science, or the social sciences more generally. Instead, I would describe his report as more akin to “casual observation,” rather than rigorous social science.

Introduction to Simulations Analysis

11. To gauge the range of possible partisan outcomes of congressional districts drawn in New York, I conduct simulated districting analyses to allow me to produce a large number of districting plans that follow traditional districting criteria using small geographic units as

³ King, Gary., Verba, Sidney., Keohane, Robert O., *Designing Social Inquiry: Scientific Inference in Qualitative Research*, New Edition. United States: Princeton University Press, 2021

building blocks for hypothetical legislative districts (precincts, or voting tabulation districts (VTDs)).

12. For my simulations, I use a program known as “*redist*” developed by Fifield et al. (2020) and implemented using the statistical software program “R”.⁴ Notably, this is the same program, run using the same statistical software that Mr. Trende uses for his simulations analysis in his report.⁵

13. One potential advantage of the simulation-based approach in general is the ability to compare a proposed map to a set of maps that are drawn without consideration of criteria such as partisanship. If the proposed map is similar to the set of simulated maps, it is reasonable to assume that the proposed map was not drawn primarily with partisan intent. If the map differs from the simulations, it is important to recognize that a variety of factors could have played into the deviation, but the underlying idea is that a deviation from the simulations reflects a choice by the mapmaker to prioritize some factor that was not made a priority in the simulations.

14. However, a major factor in the validity of the simulated maps is whether or not they constitute a representative sample of the trillions of legally valid possible maps that could be drawn.⁶ If the sample produced by the simulations is not representative, then we may be

⁴ Fifield, Benjamin, , Michael Higgins, Kosuke Imai, and Alexander Tarr. “Automated redistricting simulation using Markov chain Monte Carlo.” *Journal of Computational and Graphical Statistics* 29, no. 4 (2020): 715-728. Fifield, Benjamin, Kosuke Imai, Jun Kawahara, and Christopher T Kenny. 2020. “The essential role of empirical validation in legislative redistricting simulation.” *Statistics and Public Policy* 7 (1): 52–68. Kenny, Christopher T., Cory McCartan, Benjamin Fifield, and Kosuke Imai. 2020. *redist: Computational Algorithms for Redistricting Simulation*. <https://CRAN.R-project.org/package=redist>. McCartan, Cory, and Kosuke Imai. 2020. “Sequential Monte Carlo for sampling balanced and compact redistricting plans.” arXiv preprint arXiv:2008.06131.

⁵ The process of simulating districting plans has been recognized and used in a variety of redistricting cases, including in North Carolina, Ohio, Pennsylvania, Michigan, and Alabama. See *League of Women Voters of Ohio v. Ohio Redistricting Commission* (2021); *Harper v. Hall* (2021); *Common Cause v. Lewis* (2019); *Harper v. Lewis* (2019); *League of Women Voters of Pennsylvania v. Commonwealth of Pennsylvania* (2018); *Caster v. Merrill* (2021).

⁶ Tam Cho, Wendy K., and Yan Y. Liu. “Toward a talismanic redistricting tool: A computational method for identifying extreme redistricting plans.” *Election Law Journal* 15, no. 4 (2016): 351-366. Cho, Wendy K. Tam, and

comparing a proposed map to a biased selection of alternative maps, which renders the value of the comparison meaningless.

Replicating Mr. Trende's Simulation Model

15. In conducting the simulations, I try to adhere as closely to the decisions made by Mr. Trende in programming the algorithm so that the set of simulations I produce closely resembles his simulations results. I do this not because the decisions made in programming the algorithm by Mr. Trende are necessarily the most accurate, nor because they result in a set of maps that follows state and federal laws governing redistricting. Instead, I follow his decisions to show that even if we accept his particular programming decisions, the results and analysis he performs from the resulting simulations do not support the conclusion that the Enacted map is drawn to systematically benefit the Democratic Party.

16. Generating a representative sample of maps requires ensuring that the algorithm drawing the maps is following the legal criteria that govern the redistricting process. The Constitution of New York states that the following redistricting criteria shall be considered:

- (i) Districts shall not be drawn to have the purpose of, nor shall they result in, the denial or abridgment of racial or language minority voting rights, and districts shall be drawn so that, based on the totality of the circumstances, racial minority language groups do not have less opportunity to participate in the political process than other members of the electorate and to elect representatives of their choice.
- (ii) Districts shall contain an equal number of inhabitants (to the extent practicable).
- (iii) Each district shall consist of contiguous territory.
- (iv) Each district shall be as compact in form as practicable.

Bruce E. Cain. "Human-centered redistricting automation in the age of AI." *Science* 369, no. 6508 (2020): 1179-1181. McCartan, Cory, and Kosuke Imai. "Sequential Monte Carlo for sampling balanced and compact redistricting plans." arXiv preprint arXiv:2008.06131 (2020).

(v) Districts shall not be drawn to discourage competition or for the purpose of favoring or disfavoring incumbents or other particular candidates or political parties.

(vi) Consider the maintenance of cores of existing districts.

(vii) Consider pre-existing political subdivisions, including counties, cities, and towns, and of communities of interest.

17. Furthermore, there are possible federal requirements related to the Voting Right Act that may need to be considered. For congressional maps, the federal Constitution also imposes a more exacting population equality requirement.

18. Mr. Trende notes in his report how he attempts to comply with some of these requirements. Others are not mentioned. I will discuss their use in the algorithm in turn.

19. The first factor listed above deals with minority voting rights. This would also dovetail with any requirements that might apply under the Voting Rights Act as well. Mr. Trende does not instruct the algorithm to incorporate or consider any racial data (Trende Report, pg. 18). As a result, I also instruct the simulation algorithm to not consider race when drawing the district lines, not as an endorsement of the validity of that approach to building a simulation model, but only to attempt to replicate Mr. Trende's methodology. Mr. Trende discusses the outcome of the model with regards to race, but it is not a factor explicitly considered or coded into the statistical model.

20. With respect to equal population, congressional districts are constrained to contain a truly equal population. It is not possible to place such a strict constraint on the model. Because of this, I relax the constraint to allow for a +/- .5% deviation, or a roughly 3,900-person deviation. This is common in redistricting simulations of congressional districts and is true of both my simulations as well as those presented by Mr. Trende in his report (Mr. Trende reports

that he allows for a 1% population deviation). The process for zeroing out population on any given simulation map would have minimal to no impact on the partisan outcomes.⁷

21. In both my simulations and those of Mr. Trende, the model is constrained to create geographically contiguous districts.

22. With regard to geographic compactness, Mr. Trende notes that he instructed the model to generate “reasonably compact” districts (Trende Report, pg. 10). Compactness in the algorithm is set using a “compactness parameter,” essentially a single number with higher numbers indicating a preference for the model to generate more compact districts. I am unsure of what specific value Mr. Trende chose because he does not indicate his choice in his report; however, in my experience any value aside from 1 leads to poor performance by the algorithm, and 1 is the default value set by the creators of the algorithm.⁸

23. The next factor in the list is the prohibition on consideration of partisanship or partisan advantage. Mr. Trende and I both accomplish this by instructing the algorithm to draw districts without any information about the partisanship or partisan lean of the precincts that are assembled into the various districts.

24. The next factor is the consideration or maintenance of the cores of the existing districts using during the 2012-2020 elections. Mr. Trende makes no statement about this factor,

⁷ See for example: Expert report of Dr. Wesley Pegden in *League of Women Voters of Pennsylvania* case, whose simulations use a 2% population constraint. Expert report of Dr. Jonathan Mattingly in *Harper v. Hall* in North Carolina, whose congressional simulations use a 1% population constraint and states, “We have verified in previous work in related settings that the small changes needed to make the districting plan have perfectly balanced populations do not change the results.” See also expert report of Daniel Magleby in *Harper v. Hall* in North Carolina. Also, expert report of Kouske Imai in *League of Women Voters of Ohio v. Ohio Redistricting Commission*, who uses a 0.5% population deviation and states, “Although this deviation is greater than the population deviation used in the Enacted plan, it only accounts for less than 4,000 people and hence has no impact on the conclusions of my analysis.”

⁸ https://www.rdocumentation.org/packages/redist/versions/3.0.7/topics/redist_smc

and I take this to indicate that his model does not consider the previous districts when conducting the simulations.

25. The final factor is the consideration of pre-existing political subdivisions --- counties, cities, towns, and communities of interest. Mr. Trende notes that he instructs the model to avoid splitting county boundaries (Trende Report, pg. 10). There is no mention of any constraints to avoid divisions of cities or towns and no consideration of other communities of interest. I follow this by instructing the model to respect county boundaries as often as possible.

26. Specifically, I instruct the model to conduct 50,000 simulations that each generate 26 congressional districts by assembling VTDs into districts that meet the redistricting criteria discussed above.

27. Once the simulated district plans are complete, only then do I compute the partisan composition of each district in each plan. For the partisan composition of each district I rely on the election results from seven statewide elections disaggregated to the level of the election precinct. The particular races are 2020: President; 2018: Governor, US Senate, Attorney General, and Comptroller; 2016: President, and US Senate. These are the same elections used by Mr. Trende with the addition of the 2018 Comptroller election. This is the most extensive set of statewide elections that I could obtain given the time constraints. Once the partisan data are matched to the precinct, I calculate the partisan composition of each district for each election in all of the 50,000 simulated plans. In the analysis below I present the results for the average of all seven of these elections. Averages of multiple elections have the benefit of “washing out” the impact of any election, since individual elections can vary due to particular idiosyncratic candidate features. Furthermore, particular years can vary due to national electoral waves (i.e.

2018 was an especially good year for Democrats while 2016 was an especially good year for Republicans nationwide).

Partisan Lean of Districts Compared to Simulations

28. Having established that my simulation methodology very closely mirrors that of Mr. Trende, in this section I show that the results of the simulations do not support the conclusion that the Enacted plan is systematically tilted or beneficial to the Democratic party.

29. Mr. Trende presents the results of his simulations using what he calls a “gerrymandering index. There are multiple reasons why this method of comparing the Enacted plan to the simulations is less preferred to the method I use later in this section of simply showing the number of districts carried by each party in the average of past elections.

30. The first reason is that this method of presenting the results of a redistricting simulations exercise has not, to my knowledge, been used in any expert reports by Mr. Trende or any other expert in any redistricting cases in this cycle or any previous cycles. Novelty in and of itself is not necessarily bad. However, using the gerrymandering index in the manner that Mr. Trende does in his report eliminates the ability to see whether the plan is systematically differing from the simulations in a Republican direction, a Democratic direction, or if the deviations from the simulations are relatively evenly split between the parties.

31. This has important implications because Mr. Trende interprets the results of this analysis to indicate that the plan benefits Democrats (see pg. 14, Trende Report). However, the results of his analysis can tell us literally nothing about the direction or party that is benefitted by any deviation from the Enacted plan and the simulation results.

32. Figure 1 below displays a much more common method of comparing a set of simulations to the Enacted plan than does the gerrymandering index that Mr. Trende used. I

begin by calculating a partisan index for each district in the Enacted plan and in the 50,000 simulations. The partisan index is the proportion of the two-party vote share cast for the Democratic candidate across all of the seven statewide elections noted earlier. If a district in the simulations or in the Enacted Congressional plan has a partisan index greater than 0.50, I call that a Democratic-leaning district, or that the Democratic party “carried” the district. Likewise, if a district in the simulations has a partisan index less than 0.50, I call that a Republican-leaning district, or that the Republican Party “carried” the district. The grey histogram shows the distribution of the number of seats carried by Democrats in the 50,000 simulated maps. The simulations generate between 22 and 26 Democratic-leaning districts, and the numbers above each bar in the histogram display the proportion of simulated maps that generate each outcome.

33. For example, in 40% of the simulations there are 23 Democratic-leaning districts (and therefore 3 Republican-leaning districts). In 36.1% of the simulations there are 24 Democratic-leaning districts (and therefore 2 Republican-leaning districts). The solid black vertical line shows the results of calculating the same partisan index for the Enacted Congressional plan. The Enacted plan generates 22 Democratic leaning districts, which is in line with the distribution of Democratic-leaning seats generated by the simulations (17% of the simulations generate this result). If anything, the Enacted plan generates fewer Democratic-leaning districts than the typical simulation. As noted above, the most common outcome in the simulations is 23 Democratic-leaning seats, which is one more than the Enacted Congressional plan generates, and the second most common outcome is 24 Democratic-leaning seats, which is two more than the Enacted Congressional plan generates. None of the 50,000 simulations has fewer than 22 Democratic-leaning districts (and therefore none has more than 4 Republican-leaning districts).

**Comparison to 50,000 simulated NY congressional plans:
(drawn with population equality, compactness, and minimal county splits)**

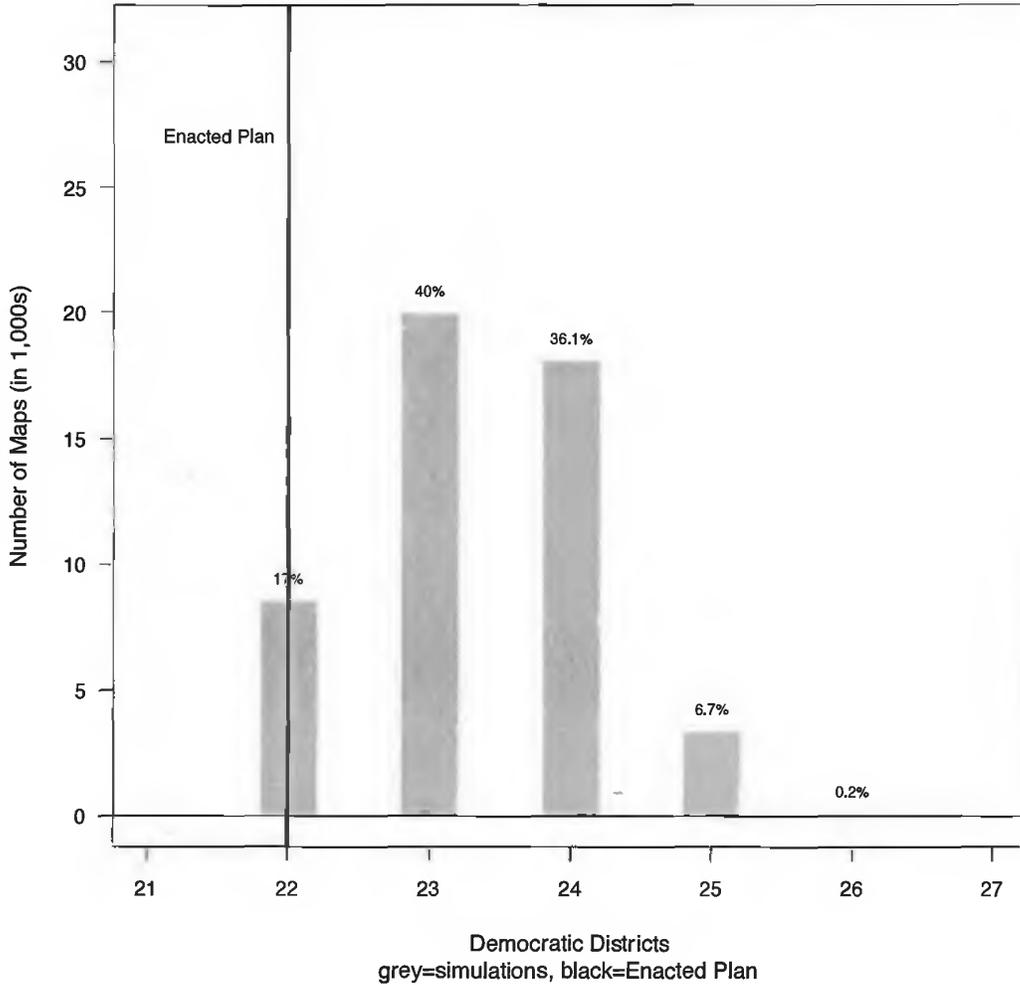


Figure 1: The grey distribution is the number of Democratic seats generated from the 50,000 simulations. The vertical black line is the number of Democratic leaning seats in the Enacted Congressional plan. The Enacted plan generates 22 Democratic leaning districts. The partisan lean of districts in the simulations and the Enacted Congressional plan are calculated as the two-party vote share of statewide partisan elections from 2016-2020.

34. Recall that in using the simulations we are comparing the Enacted Congressional map to a set of maps drawn by the computer using only those criteria that I (based on Trende's chosen criteria) instructed the algorithm to follow – namely, equal population, contiguity, geographic compactness, and a preference for fewer county splits. Both the Enacted Congressional plan and the simulations account for the unique political geography of New York. Doing so shows us that the New York plan is within the range of simulation results and if anything leans slightly towards the Republican party by generating 22 Democratic-leaning districts rather than 23, which is the modal outcome in the simulations. By no standard definition would the plan be considered an outlier.

35. Mr. Trende does not report his results showing the number of seats carried by Democrats or Republicans from his simulations. However, the figure on page 15 of his report allows us to see what such an analysis would show. In that figure we see that there are 21 districts in which *none* of the simulations produced a Republican-leaning district. Furthermore, there is one additional district in which nearly all the simulations generate a Democratic-leaning district, and another district in which the vast majority of the simulations generate a Democratic-leaning district. The remaining three districts are Republican-leaning in the majority, or all of the simulations. Given this, we can deduce that by far the most common outcome in his simulations is a map that produces 23 Democratic-leaning districts and 3 Republican-leaning districts --- one more Democratic district than the Enacted plan creates. This outcome aligns with the results I present in Figure 1 above. If anything, the 2022 Enacted Congressional plan favors the Republican Party when compared to Mr. Trende's simulation results.

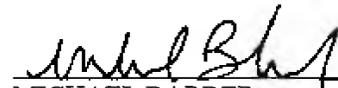
Maintenance of District Cores

36. The New York Constitution recognizes maintaining the core of previous districts as a valid redistricting criteria. Neither Mr. Trende nor Mr. LaVigne discuss or take into account this factor when discussing the 2022 Enacted Congressional map, notwithstanding its inclusion in the state's constitution. The following section reports the composition of the 2022 Enacted districts in terms of how they are composed from pieces of previous special-master drawn 2012 districts. For each set of districts, I note the largest percent of the new 2022 districts that is retained from the old 2012 districts. In all cases but one, the new districts retain greater than 50% of the old district population. In the one case where this is not the case, the new district (District 19) is composed of nearly equal parts of two old districts (Districts 19 and 22). This is largely because in losing a district it would not be possible to have high core retention of districts as the remaining 26 districts must "absorb" the population of the outgoing districts while at the same time also adjusting to shifts in the population over the last decade.

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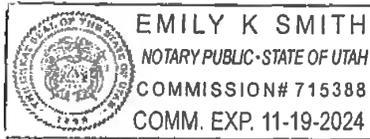
Conclusion

Based on the evidence and analysis presented above, it is my opinion that even accepting Mr. Trende’s analysis, the Enacted Plan is not systematically tilted or beneficial to the Democratic party, and if anything, favors the Republican party.


MICHAEL BARBER

Sworn to before me this 24
day of February, 2022


Notary Public



CERTIFICATION

I certify that the foregoing AFFIDAVIT OF DR. MICHAEL BARBER, PH.D complies with the word count limit set forth in Uniform Rule 208.8-b and this Court's rules. Exclusive of caption and signature block, the affidavit contains 4,315 words.

Dated: February 24, 2022



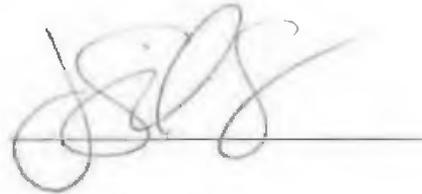
Joseph H. Lessem, Esq.

CERTIFICATE OF CONFORMITY PURSUANT TO N.Y. C.P.L.R. § 2309(c)

I, J Scott Eplin, do hereby certify and attest that I am an attorney duly admitted to practice law in the State of Utah.

I make this certification for the purposes of compliance with New York State Civil Practice Law & Rules Section 2903(c) with regard to the Affidavit of Michael Barber, a copy of which is annexed hereto, to be filed in Supreme Court in Steuben County, State of New York.

Said Affidavit, acknowledged and sworn by Mr. Barber before a Notary Public in and for the State of Utah, and said Affidavit being therein sworn in the State of Utah, is and appears to be, based upon my review of said document and notarization thereof, in conformity with the laws of the State of Utah for the making of an affidavit and the notarization thereof.



**EXHIBIT A TO BARBER AFFIDAVIT -
CURRICULUM VITAE OF MICHAEL BARBER, PH.D. [1010 - 1015]**

FILED: STEUBEN COUNTY CLERK 02/24/2022 04:54 PM

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RECEIVED NYSCEF: 02/24/2022

Michael Jay Barber

**CONTACT
INFORMATION**

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Provo, UT 84602

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**ACADEMIC
APPOINTMENTS**

Brigham Young University, Provo, UT

August 2020 - present Associate Professor, Department of Political Science
2014 - July 2020 Assistant Professor, Department of Political Science
2014 - present Faculty Scholar, Center for the Study of Elections and Democracy

EDUCATION

Princeton University Department of Politics, Princeton, NJ

Ph.D., Politics, July 2014

- Advisors: Brandice Canes-Wrone, Nolan McCarty, and Kosuke Imai
- Dissertation: "Buying Representation: the Incentives, Ideology, and Influence of Campaign Contributions on American Politics"
- 2015 Carl Albert Award for Best Dissertation, Legislative Studies Section, American Political Science Association (APSA)

M.A., Politics, December 2011

Brigham Young University, Provo, UT

B.A., International Relations - Political Economy Focus, April, 2008

- *Cum Laude*

**RESEARCH
INTERESTS**

American politics, congressional polarization, political ideology, campaign finance, survey research

PUBLICATIONS

19. **"Ideological Disagreement and Pre-emption in Municipal Policymaking"**
with Adam Dynes
Forthcoming at *American Journal of Political Science*
18. **"Comparing Campaign Finance and Vote Based Measures of Ideology"**
Forthcoming at *Journal of Politics*
17. **"The Participatory and Partisan Impacts of Mandatory Vote-by-Mail"**, with John Holbein
Science Advances, 2020. Vol. 6, no. 35, DOI: 10.1126/sciadv.abc7685
16. **"Issue Politicization and Interest Group Campaign Contribution Strategies"**, with Mandi Eatough
Journal of Politics, 2020. Vol. 82: No. 3, pp. 1008-1025

15. **“Campaign Contributions and Donors’ Policy Agreement with Presidential Candidates”**, with Brandice Canes-Wrone and Sharece Thrower
Presidential Studies Quarterly, 2019, 49 (4) 770–797
14. **“Conservatism in the Era of Trump”**, with Jeremy Pope
Perspectives on Politics, 2019, 17 (3) 719–736
13. **“Legislative Constraints on Executive Unilateralism in Separation of Powers Systems”**, with Alex Bolton and Sharece Thrower
Legislative Studies Quarterly, 2019, 44 (3) 515–548
Awarded the Jewell-Loewenberg Award for best article in the area of subnational politics published in *Legislative Studies Quarterly* in 2019
12. **“Electoral Competitiveness and Legislative Productivity”**, with Soren Schmidt
American Politics Research, 2019, 47 (4) 683–708
11. **“Does Party Trump Ideology? Disentangling Party and Ideology in America”**, with Jeremy Pope
American Political Science Review, 2019, 113 (1) 38–54
10. **“The Evolution of National Constitutions”**, with Scott Abramson
Quarterly Journal of Political Science, 2019, 14 (1) 89–114
9. **“Who is Ideological? Measuring Ideological Responses to Policy Questions in the American Public”**, with Jeremy Pope
The Forum: A Journal of Applied Research in Contemporary Politics, 2018, 16 (1) 97–122
8. **“Status Quo Bias in Ballot Wording”**, with David Gordon, Ryan Hill, and Joe Price
The Journal of Experimental Political Science, 2017, 4 (2) 151–160.
7. **“Ideologically Sophisticated Donors: Which Candidates Do Individual Contributors Finance?”**, with Brandice Canes-Wrone and Sharece Thrower
American Journal of Political Science, 2017, 61 (2) 271–288.
6. **“Gender Inequalities in Campaign Finance: A Regression Discontinuity Design”**, with Daniel Butler and Jessica Preece
Quarterly Journal of Political Science, 2016, Vol. 11, No. 2: 219–248.
5. **“Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate”**
Public Opinion Quarterly, 2016, 80: 225–249.
4. **“Donation Motivations: Testing Theories of Access and Ideology”**
Political Research Quarterly, 2016, 69 (1) 148–160.
3. **“Ideological Donors, Contribution Limits, and the Polarization of State Legislatures”**
Journal of Politics, 2016, 78 (1) 296–310.
2. **“Online Polls and Registration Based Sampling: A New Method for Pre-Election Polling”** with Quin Monson, Kelly Patterson and Chris Mann.
Political Analysis 2014, 22 (3) 321–335.
1. **“Causes and Consequences of Political Polarization”** In *Negotiating Agreement in Politics*. Jane Mansbridge and Cathie Jo Martin, eds., Washington, DC: American Political Science Association: 19–53. with Nolan McCarty. 2013.
 - Reprinted in *Solutions to Political Polarization in America*, Cambridge University Press. Nate Persily, eds. 2015
 - Reprinted in *Political Negotiation: A Handbook*, Brookings Institution Press. Jane Mansbridge and Cathie Jo Martin, eds. 2015

AVAILABLE
WORKING PAPERS **“Misclassification and Bias in Predictions of Individual Ethnicity from Administrative Records”** (Revise and Resubmit at *American Political Science Review*)

“Taking Cues When You Don’t Care: Issue Importance and Partisan Cue Taking”
with Jeremy Pope (Revise and Resubmit)

“A Revolution of Rights in American Founding Documents”
with Scott Abramson and Jeremy Pope (Conditionally Accepted)

“410 Million Voting Records Show the Distribution of Turnout in America Today”
with John Holbein (Revise and Resubmit)

“Partisanship and Trolleyology”
with Ryan Davis (Under Review)

“Who’s the Partisan: Are Issues or Groups More Important to Partisanship?”
with Jeremy Pope (Revise and Resubmit)

“Race and Realignment in American Politics”
with Jeremy Pope (Revise and Resubmit)

“The Policy Preferences of Donors and Voters”

“Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records.”
with Kosuke Imai

“Super PAC Contributions in Congressional Elections”

WORKS IN
PROGRESS **“Collaborative Study of Democracy and Politics”**
with Brandice Canes-Wrone, Gregory Huber, and Joshua Clinton

“Preferences for Representational Styles in the American Public”
with Ryan Davis and Adam Dynes

“Representation and Issue Congruence in Congress”
with Taylor Petersen

“Education, Income, and the Vote for Trump”
with Edie Ellison

INVITED
PRESENTATIONS **“Are Mormons Breaking Up with Republicanism? The Unique Political Behavior of Mormons in the 2016 Presidential Election”**

- Ivy League LDS Student Association Conference - Princeton University, November 2018, Princeton, NJ

“Issue Politicization and Access-Oriented Giving: A Theory of PAC Contribution Behavior”

- Vanderbilt University, May 2017, Nashville, TN

“Lost in Issue Space? Measuring Levels of Ideology in the American Public”

- Yale University, April 2016, New Haven, CT

“The Incentives, Ideology, and Influence of Campaign Donors in American Politics”

- University of Oklahoma, April 2016, Norman, OK

“Lost in Issue Space? Measuring Levels of Ideology in the American Public”

- University of Wisconsin - Madison, February 2016, Madison, WI

“Polarization and Campaign Contributors: Motivations, Ideology, and Policy”

- Hewlett Foundation Conference on Lobbying and Campaign Finance, October 2014, Palo Alto, CA

“Ideological Donors, Contribution Limits, and the Polarization of State Legislatures”

- Bipartisan Policy Center Meeting on Party Polarization and Campaign Finance, September 2014, Washington, DC

“Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate”

- Yale Center for the Study of American Politics Conference, May 2014, New Haven, CT

CONFERENCE
PRESENTATIONS

Washington D.C. Political Economy Conference (PECO):

- 2017 discussant

American Political Science Association (APSA) Annual Meeting:

- 2014 participant and discussant, 2015 participant, 2016 participant, 2017 participant, 2018 participant

Midwest Political Science Association (MPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2018 participant

Southern Political Science Association (SPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2017 participant

TEACHING
EXPERIENCE

Poli 315: Congress and the Legislative Process

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

Poli 328: Quantitative Analysis

- Winter 2017, Fall 2017, Fall 2019, Winter 2020, Fall 2020, Winter 2021

Poli 410: Undergraduate Research Seminar in American Politics

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

AWARDS AND
GRANTS

2019 BYU Mentored Environment Grant (MEG), American Ideology Project, \$30,000

2017 BYU Political Science Teacher of the Year Award

2017 BYU Mentored Environment Grant (MEG), Funding American Democracy Project, \$20,000

2016 BYU Political Science Department, Political Ideology and President Trump (with Jeremy Pope), \$7,500

2016 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Hayden Galloway, Jennica Peterson, Rebecca Shuel

2015 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Michael-Sean Covey, Hayden Galloway, Sean Stephenson

2015 BYU Student Experiential Learning Grant, American Founding Comparative Constitutions Project (with Jeremy Pope), \$9,000

2015 BYU Social Science College Research Grant, \$5,000

2014 BYU Political Science Department, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$3,000

2014 BYU Social Science College Award, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$3,000

2014 BYU Center for the Study of Elections and Democracy, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), \$2,000

2012 Princeton Center for the Study of Democratic Politics Dissertation Improvement Grant, \$5,000

2011 Princeton Mamdouha S. Bobst Center for Peace and Justice Dissertation Research Grant, \$5,000

2011 Princeton Political Economy Research Grant, \$1,500

OTHER SCHOLARLY
ACTIVITIES

Expert Witness in Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida)

Expert Witness in Common Cause, et al., Plaintiffs, vs. LEWIS, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina)

Expert Witness in Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida)

Expert Witness in Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina)

Expert Witness in Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia)

Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia)

Expert Witness in Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE No. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division)

Expert Witness in League of Women Voters of Ohio, et al., Relators, v. Ohio Redistricting Commission, et al., Respondents. Case No. 2021-1193 (Supreme Court of Ohio)

Expert Witness in Regina Adams, et al., Relators, v. Governor Mike DeWine, et al., Respondents. Case No. 2021-1428 (Supreme Court of Ohio)

Expert Witness in Rebecca Harper, et al., Plaintiffs, v. Representative Destin Hall, et al., Defendants (Consolidated Case). Case No. 21 CVS 500085 (Wake County, North Carolina)

ADDITIONAL TRAINING

EITM 2012 at Princeton University - Participant and Graduate Student Coordinator

COMPUTER SKILLS

Statistical Programs: R, Stata, SPSS, parallel computing

Updated January 7, 2022

LETTER FROM CRAIG R. BUCKI, ESQ. TO HONORABLE PATRICK F. MCALLISTER,
DATED FEBRUARY 25, 2022 [1016 - 1017]



Phillips Lytle LLP

Via NYSCEF

February 25, 2022

Hon. Patrick F. McAllister
Acting New York State Supreme Court Justice
Steuben County Supreme Court
3 East Pulteney Square
Bath, New York 14810

Re: *Matter of Harkenrider v. Hochul* (Steuben County Index No. E2022-0116CV)

Dear Justice McAllister:

As co-counsel to New York State Assembly Speaker Carl Heastie, we oppose conducting any testimony by expert witnesses, or any other witnesses, in the above-captioned proceeding on March 3, 2022, for at least two reasons.

First, Governor Kathy Hochul, a necessary party to this proceeding pursuant to New York Unconsolidated Laws § 4221, has raised by way of a motion to dismiss a complete defense to this proceeding, inasmuch as the Petition was not duly served upon her. *See* NYSCEF Dkt. No. 75. Absent service of the Petition upon a necessary party such as the Governor, the entire proceeding fails against all the Respondents. *Accord, Windy Ridge Farm v. Assessor of Town of Shandaken*, 11 N.Y.3d 725, 727 (2008). We submit no testimony should be taken, if at all, unless and until this Court decides the Governor's motion to dismiss.

Second, also pending before this Court is Petitioners' motion for leave to amend their Petition, which proposed amendment Respondents oppose. We also submit no testimony should be taken, if at all, unless and until this Court also decides what shall be the Petition, and affords the parties a reasonable time to prepare.

Should this Court decide to hear testimony in this proceeding to commence on March 3, 2022, we respectfully request that this Court issue an Order so confirming, so that Respondents may take a prompt appeal from such determination to the Appellate

ATTORNEYS AT LAW

CRAIG R. BUCKI, PARTNER DIRECT 716 847 5495 CBUCKI@PHILLIPSLYTLE.COM

ONE CANALSIDE 125 MAIN STREET BUFFALO, NY 14203-2887 PHONE 716 847 8400 FAX 716 852 6100
PHILLIPSLYTLE.COM



Hon. Patrick F. McAllister
Page 2

February 25, 2022

Division, Fourth Department. Counsel for State Senate Majority Leader Andrea Stewart-Cousins also joins in this letter.

Respectfully,

Phillips Lytle LLP

By

Craig R. Bucki

CRBkms3

LETTER FROM BENNET J. MOSKOWITZ, ESQ. AND MISHA TSEYTLIN TO HONORABLE
PATRICK F. MCALLISTER, DATED FEBRUARY 25, 2022 [1018 - 1019]

Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com



Bennet J. Moskowitz
bennet.moskowitz@troutman.com

February 25, 2022

VIA NYSCEF

Honorable Patrick F. McAllister, J.S.C.
Supreme Court, Steuben County
3 East Pulteney Square
Bath, New York 14810

Re: *Harkenrider, et al. v. Hochul, et al.*, Index No. E2022-0116CV (Sup. Ct. Steuben Cnty.)

Dear Justice McAllister:

We represent Petitioners in the above-referenced CPLR Article 4 special proceeding and write in response to the letter of Respondent Assembly Speaker Carl Heastie (“Speaker”) filed earlier today. The Speaker’s letter makes two assertions, both of which are incorrect.

First, reiterating a frivolous argument made by the Governor and Lieutenant Governor, the Speaker claims that Petitioners failed to properly serve the Attorney General with the Petition under CPLR § 2214(d). Speaker 2-25-2022 Ltr. at 1; NYSCEF No.82 at 6–7. This argument is entirely wrong for at least three independent reasons, as Petitioners will explain very briefly here and more fully in their Reply Memorandum due to the Court next week. CPLR § 403(d) governs the service of the Petition, *not* CPLR § 2214(d)—which governs the service of motions. Under CPLR § 403(d), Petitioners were only required to comply with the form of service ordered by this Court in its Order To Show Cause, which Petitioners did. *See* NYSCEF No.11 at 4; NYSCEF No.62. Next, even if CPLR § 2214(d) somehow did apply—which it obviously does not—that would not impact this Court’s jurisdiction to hear this special proceeding, given that the Attorney General admits that she actually received service. *See Duffy v. Schenck*, 341 N.Y.S.2d 31, 33 (Sup. Ct. Nassau Cty.), *aff’d*, 42 A.D.2d 774 (2d Dep’t 1973) (refusing to dismiss for defect in service under CPLR § 2214(d) where there “has been no prejudice”); *O’Brien v. Pordum*, 120 A.D.3d 993, 994 (4th Dep’t 2014) (citing CPLR § 2001). Finally, the Attorney General has waived this frivolous argument in any event, by already appearing and participating in this case without first raising it. *Duffy*, 341 N.Y.S.2d at 33.

Second, the Speaker seeks to delay this Court’s hearing testimony from expert witnesses in person, should this Court so desire, because Petitioners’ Motion For Leave To Amend to add their challenge to the 2022 Senate Map to this special proceeding is still pending. Speaker 2-25-

Honorable Patrick F. McAllister
February 25, 2022
Page 2



2022 Ltr. at 1; NYSCEF No.13. Respondents have already submitted three expert reports with this Court, NYSCEF Nos.73, 86, 92, and applied their own expert's flawed methodology to the Senate map, NYSCEF No.74 at 5. Thus, there could be no possible justification for delaying this Court's receiving testimony from expert witnesses in person, should this Court so desire.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bennet J. Moskowitz".

Bennet J. Moskowitz

A handwritten signature in blue ink, appearing to read "Misha Tseytlin".

Misha Tseytlin

cc: All Counsel Of Record (via NYSCEF and email)

AFFIDAVITS OF SERVICE OF THE PETITION, ORDER TO SHOW CAUSE, AND SUPPORTING DOCUMENTS, SWORN TO MARCH 1, 2022 [1020 - 1021]

FILED: STEUBEN COUNTY CLERK 03/01/2022 10:08 PM
AFFIDAVIT OF SERVICE

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 03/01/2022

NYSCEF DOC. NO. 100
INDEX #: E2022-0116CV
RETURN DATE: 03/03/2022 @ 9:30AM
ATTORNEY: TROUTMAN PEPPER HAMILTON SANDERS LLP
875 THIRD AVENUE NEW YORK NY 10022 (212)704-6000

SUPREME COURT OF THE STATE OF NEW YORK STEUBEN COUNTY

TIM HARKENRIDER, ET AL
PETITIONERS,
-AGAINST-
GOVERNOR KATHY HOCHUL, ET AL
RESPONDENTS.

STATE OF NEW YORK:
COUNTY OF ALBANY: ss:

STEF MARIE, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

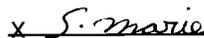
That on 02/28/2022, 03:41PM at STATE CAPITOL BUILDING, 2ND FLOOR LOBBY, ALBANY, NY 12224, deponent served a PETITION, SIGNED ORDER TO SHOW CAUSE, [PROPOSED ORDER TO SHOW CAUSE AFFIRMATION IN SUPPORT OF PETITIONERS' ORDER TO SHOW CAUSE AND EXHIBITS A-F, REQUEST FOR JUDICIAL INTERVENTION, REQUEST FOR JUDICIAL INTERVENTION ADDENDUM, NOTICE OF APPEARANCE OF MISHA TSEYTLIN, SIGNED ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION, [PROPOSED] ORDER TO SHOW CAUSE FOR LEAVE TO FILE AMENDED PETITION WITH EXHIBITS A-G, MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR LEAVE TO AMEND, MEMORANDUM OF LAW IN SUPPORT OF PETITION AND AMENDED PETITION, EXPERT REPORT OF SEAN P. TRENDE, EXPERT REPORT OF CLAUDE A. LAVIGNA, AFFIDAVIT OF ROBERT ORTT IN SUPPORT OF PETITION, AFFIDAVIT OF LAWRENCE GARVEY IN SUPPORT OF PETITION, ORDER TO SHOW CAUSE TO EXPEDITE DISCOVERY, AFFIRMATION OF BENNET MOSKOWITZ IN SUPPORT OF ORDER TO SHOW CAUSE TO EXPEDITE DISCOVERY WITH EXHIBITS A AND B AND EXHIBITS 1-14, LETTER TO JUDGE MCALLISTER DATED FEB. 14, 2022, LETTER TO JUDGE MCALLISTER DATED FEB. 15, 2022, LETTER TO JUDGE MCALLISTER DATED FEB. 24, 2022, AND LETTER TO JUDGE MCALLISTER DATED FEB. 25, 2022 upon GOVERNOR KATHY HOCHUL, a respondent in the above captioned matter.

By delivering a true copy thereof to and leaving with MEGAN MEYERS, a person of suitable age and discretion at the above address, the said premises being the respondent's place of business within the State of NEW YORK.

DEPONENT DESCRIBES THE INDIVIDUAL SERVED AS FOLLOWS:
Sex F Approximate age 32 Approximate height 5'04" Approximate weight 130 Color of skin WHITE Color of hair BROWN

Sworn to before me on 03/01/2022
DAVID POST NO. 01P06427868
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES ON 01/03/2026



x 
STEF MARIE

SERVING BY IRVING INC.
18 EAST 41 STREET SUITE #1600 NEW YORK, NY 10017 (212)233-3346

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN
TIM HARKENRIDER, et al.

INDEX NO.: E2022-0116CV

vs

Plaintiff

GOVERNOR KATHY HOCHUL, et al.

Defendant

AFFIDAVIT OF SERVICE

State of New York }
County of Monroe } ss.:

The undersigned, being duly sworn, deposes and says;

Deponent is not a party herein, is over 18 years of age and resides in the State of New York,

That on 02/28/2022 at 3:45 PM at 144 Exchange Blvd., Rochester, NY 14614

deponent served a(n) Petition, Signed Order to Show Cause, [Proposed Order to Show Cause Affirmation in support of Petitioners' Order to Show Cause and Exhibits A-F, Request for Judicial Intervention, Request for Judicial Intervention Addendum, Notice of Appearance of Misha Tseytlin, Signed Order to Show Cause for Leave to File Amended Petition, [Proposed] Order to Show Cause for Leave to File Amended Petition with Exhibits A-G, Memorandum of Law in Support of Motion for Leave to Amend, Memorandum of Law in support of Petition and Amended Petition, Expert Report of Sean P. Trende, Expert Report of Claude A. LaVigna, Affidavit of Robert Ortt in Support of Petition, Affidavit of Lawrence Garvey in Support of Petition, Order to Show Cause to Expedite Discovery, Affirmation of Bennet Moskowitz in Support of Order to Show Cause to Expedite Discovery with Exhibits A and B and Exhibits 1-14, Letter to Judge McAllister Dated Feb. 14, 2022, Letter to Judge McAllister dated Feb. 15, 2022, Letter to Judge McAllister dated Feb. 24, 2022, and Letter to Judge McAllister dated Feb. 25, 2022

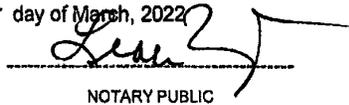
on New York State Attorney General's Office, a domestic corporation,

by delivering thereat a true copy of each to Thomas G. Ramsay personally,

deponent knew said corporation so served to be the corporation described in said documents as said defendant and knew said individual to be authorized to accept service thereof.

Description of Person Served:

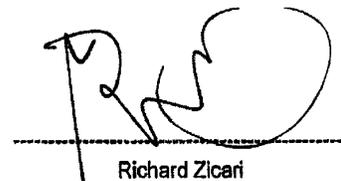
Gender : Male
Skin : White
Hair : Gray
Age : 51 - 65 Yrs.
Height : 5' 9" - 6' 0"
Weight : Over 200 Lbs.
Sworn to before me this
1st day of March, 2022



NOTARY PUBLIC

Leah Zicari 01215046728
Notary Public State of NY
Qualified in Monroe County

My Commission Expires 7/17/2023
Serving By Irving, Inc. | 18 East 41st Street, Suite 1600 | New York, NY 10017
New York City Dept. of Consumer Affairs License No. 0781160



Richard Zicari

AFFIDAVIT OF SEAN P. TRENDE IN SUPPORT OF EXPERT REPORTS,
SWORN TO MARCH 1, 2022 [1022 - 1024]

FILED: STEUBEN COUNTY CLERK 03/01/2022 10:24 PM
NYSCEF DOC. NO. 105

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 03/01/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VIOLANTE,

Index No. E2022-0116CV

**AFFIDAVIT OF SEAN P.
TRENDE IN SUPPORT OF
EXPERT REPORTS**

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

SEAN P. TRENDE, being duly sworn, says under penalty of perjury as follows:

1. I have been retained by Troutman Pepper Hamilton Sanders LLP on behalf of their clients, Petitioners in the above-titled action, to evaluate the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul.

2. I make this affidavit based on my personal knowledge, and if called upon to testify, I could and would testify to the following facts.

3. I have rendered opinions relating to the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul in the Expert Report of Sean P. Trende (hereinafter “Trende Report”).

4. I have rendered opinions relating to the Affidavit of Dr. Michael Barber, Ph.D., the Affidavit of Dr. Kristopher R. Tapp, Ph.D., and the Expert Report of Stephen Ansolabehere in the Reply of Sean P. Trende (hereinafter “Trende Reply”).

5. I have confirmed the conclusions in the Trende Report in the Trende Reply.

6. This affidavit serves to incorporate by reference the Trende Report and the Trende Reply, both of which represent my true and accurate beliefs and conclusions on the matters contained therein.

7. If asked to testify on these matters, I could and would testify under oath to their contents, under penalty of perjury.

[Handwritten signature of Sean P. Trende]
SEAN P. TRENDE

Sworn before me
on this 1 day of March, 2022

[Handwritten signature of Teja Kaylene Tibbs]
NOTARY PUBLIC



TEJA KAYLENE TIBBS
Notary Public.
State of Ohio
My Comm. Expires
September 29, 2025

CERTIFICATE OF CONFORMITY PURSUANT TO N.Y. CPLR § 2309(c)

I, Elizabeth Trende, do hereby certify and attest that I am an attorney duly admitted to practice law in the State of Ohio.

I make this certification for purposes of compliance with New York State Civil Practice Law & Rules Section 2309(c) with regard to the foregoing Affidavit of Sean Trende, to be filed in the Supreme Court in Steuben County, State of New York.

Said Affidavit, acknowledged and sworn by Mr. Trende before a Notary Public in and for the State of Ohio, is and appears to be, based upon my review of said document and notarization thereof, in conformity with the laws of the State of Ohio for the making of an affidavit and the notarization thereof.

Elizabeth Trende

Sworn before me
on this 1 day of March, 2022

Teja Kaylene Tibbs
NOTARY PUBLIC



TEJA KAYLENE TIBBS
Notary Public
State of Ohio
My Comm. Expires
September 29, 2025

REPLY OF SEAN P. TRENDE, DATED MARCH 1, 2022 [1025 - 1050]

FILED: STEUBEN COUNTY CLERK 03/01/2022 10:24 PM
NYSCEF DOC. NO. 103

INDEX NO. E2022-0116CV
RECEIVED NYSCEF: 03/01/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X

TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, and MARIANNE
VOLANTE,

Index No. E2022-0116CV

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, and THE NEW YORK STATE
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC
RESEARCH AND REAPPORTIONMENT,

Respondents.

-----X

REPLY OF SEAN P. TRENDE
MARCH 1, 2022

Reply of Sean P. Trende

I. Scope Of Engagement

I have been asked by counsel to respond to the Affidavit of Dr. Michael Barber, Ph.D. (“Barber Report”), the Affidavit of Dr. Kristopher R. Tapp, Ph.D. (“Tapp Report”), and the Expert Report of Dr. Stephen Ansolabehere (“Ansolabehere Report”) (collectively “Respondents’ Expert Reports”). I have been further asked to render such opinions relating to the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul (respectively, “Enacted Senate Map” and “Enacted Congressional Map,” or collectively, “Enacted Maps”), as needed to evaluate these three reports. I have also been asked to re-evaluate, if necessary, the conclusions found in the Expert Report of Sean P. Trende (hereinafter “Trende Report”).

II. Introduction And Executive Summary

- Respondents’ Expert Reports all miss the mark, badly. In fact, taking their objections seriously only provides stronger evidence that the Enacted Maps were drawn with the purpose of disfavoring the Republican Party and reducing the number of competitive districts.
- The Respondents’ Experts’ claim that the Enacted Maps actually reveal that the Enacted Maps have a pro-*Republican* bias fails to understand the Trende Report, which does not rest on classifying districts as “Republican” or “Democratic.” Had it done so, it would not have used the selection of races in the naïve way that Respondents’ Experts use it.
- Proper classification of districts as “Republican” or “Democratic” yields even stronger evidence that the Enacted Maps were drawn with the purpose of disfavoring the Republican Party and reducing the number of competitive districts.
- Nor does Respondents’ Experts’ complaint that the ensemble does not respect municipal boundaries or ensure proper protection of minority voting rights help Respondents’ case. In fact, *even after essentially conceding* *arguendo* to Respondents that 35% of the districts in the Enacted Plan must be drawn exactly as the legislature drew them, that municipalities should be split or consolidated

according to the legislature's determinations, and that district cores should be considered, the map still presents as an outlier compared to the ensembles.

- The additional critiques found in the Tapp Report are baseless.
- In short, the Respondents' Expert Reports actually strengthen the conclusions of the Trende Report. These conclusions do not need to be altered or revisited.

III. The Enacted Map Was Plainly Enacted To Favor Democrats And Reduce Competition

Respondents' Expert Reports ultimately rest their analysis on a faulty interpretation of the data. To understand this, it is helpful to revisit the method and conclusions offered in the Trende Report. After producing an ensemble of 5,000 simulated maps, I calculated a Gerrymandering Index, which shows how far each district deviates from the average partisanship for a particular district across the maps (for a fuller explanation, see Trende Report at 12–13).

Partisanship is measured by averaging all races included in a widely available dataset. Those races are the 2016 presidential election in New York, the 2016 New York senate election, the 2018 New York gubernatorial election, the 2018 New York attorney general election, and the 2020 presidential election in New York. *See* Trende Report at 12 n.2. Crucially, however, the Trende Report makes clear that there are any number of ways to calculate district partisanship. Thus, the Trende Report employed these races *not* because they will precisely predict the outcome of congressional elections at a threshold of 50%. As shown below, interpreting them this way is a reasonably poor way to accomplish that task.

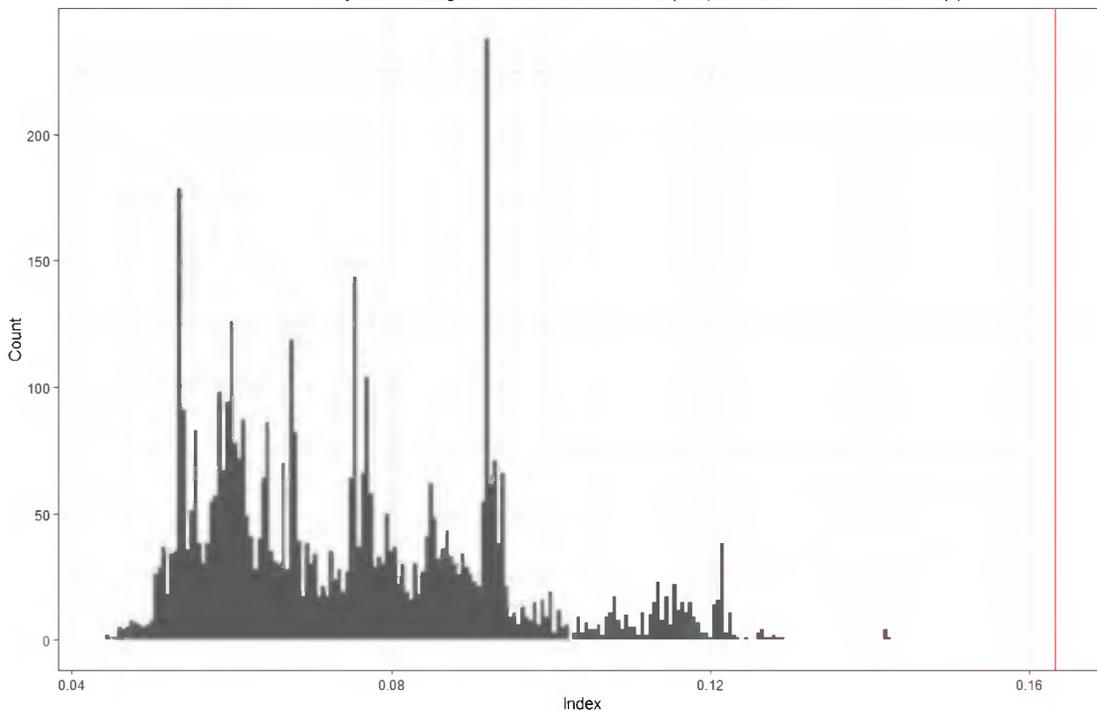
Rather, the Trende Report is express that it averages in every race in this dataset: (a) to foreclose an attack that that the races had been somehow cherry-picked in order to achieve a pre-ordained outcome, and (b) because “[t]he simulation approach tends not to be as sensitive to the choice of elections as other metrics, unless political coalitions in a state vary radically from election-to-election.” *Id.* The key to this analysis is not who wins or loses in a particular district. It is instead whether the map deviates from expected district partisanship in a way that is inexplicable except by heavy reliance on partisan data.

To begin an analogy to be revisited later, one would never want to use Massachusetts Governor Charlie Baker's performance in congressional districts in 2018 as a direct proxy for how a district would perform in congressional elections, given that his 2018 performance in Massachusetts is atypical for a Republican in that State (to say the least). At the same time, even

given his strong overall performance, we would expect districts drawn without respect to partisanship to still resemble those that an ensemble approach would create, and to exhibit no clear pattern of packing and cracking of his vote. In other words, while you cannot predict congressional elections based on Baker’s vote share, you could still usefully examine the distribution of Baker’s vote shares in districts in an ensemble and compare them to those in an enacted map to determine whether political data were used to draw the map.¹

After calculating the Gerrymandering Index for all 5,000 plans in the ensemble, which were all drawn blind to partisanship, I calculated the Gerrymandering Index for the Enacted Map. The Enacted Map appeared to be six standard deviations from the average Index produced by the ensemble, an enormously improbable outcome for a partisan-blind map drawing.

Values of Gerrymandering Index, Simulated Maps (Red Line = Enacted Map)



The Trende Report concludes that “[t]he probability that the Enacted Congressional Map would be drawn by map drawers who cared only about the constitutional mandates for compactness and avoiding undue partisan influence is vanishingly small. Put simply, it is

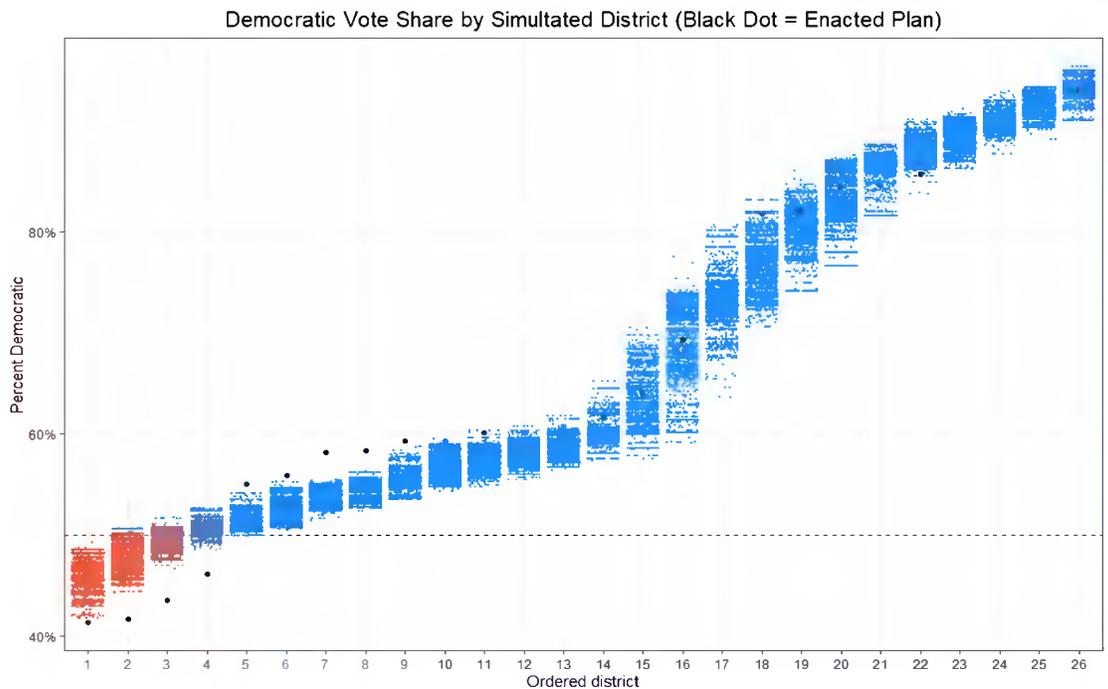
¹ To be clear, it would probably be *better* to use a more representative race or set of races. The point is simply that if Republicans are purposefully clustered in a few overwhelmingly Republican districts and improperly spread out over other districts, it should also show up in the Baker data.

implausible, if not impossible, that this map was drawn without a heavy reliance upon political data and was likely drawn to favor or disfavor a political party.” Trende Report at 14.

Respondents’ only rejoinder is to claim that the Gerrymandering Index, by itself, tells you nothing about the direction of the bias. The Gerrymandering Index can indeed detect gerrymanders for either party, but the idea that the overwhelmingly Democratic legislature set aside the map drawn by its redistricting commission and produced a map whose partisanship is an extreme outlier in order to favor of Republicans should be implausible on its face.

It is also belied by other evidence provided in the Trende Report. Contrary to the claims in the Respondents’ Expert Reports, *see, e.g.*, Tapp Report ¶¶ 26, the Trende Report does did not stop its analysis with the Gerrymandering Index, although it probably could have. Instead, the Trende Report is clear that establishing whether and which party is being disadvantaged is *best* accomplished by also “[i]nterrogating the maps from a different angle.” Trende Report at 14.

It does so by following McCartan and Imai and taking the ensemble maps, ordering each map’s districts from most-to-least Republican, and then examining how Republican or Democratic the district is, using the index of statewide races described above.



As the Trende Report notes, in the closest it comes to classifying districts directly, “[t]he only place where the Enacted Congressional Map falls within expectations is in safely Democratic

districts—those where Democrats would win over 60% of the vote. This 60% threshold, however, is significant, as political scientists and elections analysts will begin to classify elections as competitive below that threshold.” *Trende Report* at 15–16. Yet, “around district number 13, the simulation expects to see multiple districts that fall into the potentially competitive range. This is also the exact point at which the values of the Enacted Maps begin to fall outside of the expected ranges.” *Id.* at 16. We also see that the most Republican districts are made far more Republican than we would expect and note that, although the Democratic vote share in the ensemble maps rises gradually from the most Republican district to the 14th-most Republican district, Democratic vote share in the Enacted Map jumps suddenly around District 5. In other words, the map packs Republicans into a few overwhelmingly Republican districts, and then it cracks the remainder to create fewer competitive districts, which is prohibited by the New York Constitution. This is the “DNA of a gerrymander.” *Id.*; see also Gregory Herschlag *et al.*, “Quantifying Gerrymandering in North Carolina” 7 *Statistics & Pub. Pol’y* 2 (2018) (referring to this pattern as the “signature of gerrymandering”).²

IV. The Respondents’ Expert Reports Incorrectly And Needlessly (Mis)classify Districts As “Republican” Or “Democratic.” But A Proper Classification Scheme Leads To The Same Conclusions Found In The Trende Report

The Respondents’ experts’ main response to the conclusions found in the *Trende Report* appears to be that the Enacted Maps are actually biased against Democrats. The conclusion that independent analysts on the left, right, and center are all incorrect about the fairness of a map that would appear to limit Republicans to 15% of the seats (in a State where they routinely win around a third of the vote), is one that can only be reached through a misapplication of methods and a naïve interpretation of data.

Respondents’ experts embark upon an entirely different line of analysis, classifying all districts whose average Democratic performance is in excess of 50% as “likely to be won by Democrats,” *e.g.*, *Tapp Report* ¶¶ 28-34, and vice-versa. Tellingly, they cite nothing, either in the academic literature or from practitioners, suggesting that a simple average of statewide races is an accurate way to predict whether a district is “likely” to elect Republicans or Democrats to Congress. Nor do they conduct their own analysis, nor do they even *consider* actual congressional election results.

² https://www.researchgate.net/publication/322419073_Quantifying_Gerrymandering_in_North_Carolina.

The Tapp Report expends just two sentences analyzing what would constitute a Democratic district, concluding, erroneously, that any district that falls above the 50% Democratic *average* vote share in the provided index of elections would “likely” elect a Democrat. *Id.* ¶ 24. Respondents’ experts then count up the number of “Republican” districts predicted by the ensemble plans, note that the Enacted Plan creates four “Republican” districts (which is something of a best-case scenario under the ensembles), and conclude that this plan actually has a Republican bias to it. Dr. Ansolabehere employs a similar classification scheme throughout his report, both in response to my analyses and those of the other Petitioners’ experts.

This is a flawed way to classify these districts, for two reasons.

A. Classifying Districts As Simply “Republican” Or “Democratic” Is Misleading And Unwarranted.

First, such an approach converts what is, in truth, a probabilistic measure into a dichotomous one. Simply put, while methodologists and mathematicians sometimes use this as a heuristic to illustrate the functionality of redistricting algorithms, no elections analyst or elections scholar would look at a district where statewide Republicans would be expected, on average, to win 50.1% of the statewide vote and conclude it would elect Republicans to Congress, without further inquiry. Indeed, as illustrated by my first report, political scientists would, as a general matter, classify districts where parties win as much as 60% of the vote as “competitive.” Three examples help illustrate why this is the case.

First, there is no practical difference between a district where statewide Democratic candidates average 49.99% of the vote and a district that where statewide Democratic candidates average 50.01% of the vote. Both are, for all intents and purposes, equally likely to elect a Republican to Congress. But Respondents’ Expert Reports urge this Court to label the former district “Republican” and the latter district “Democratic.”

Second, this approach characterizes a district where statewide Democrats win, on average, 50.1% of the vote in the same way as it does a district where statewide Democrats win, on average, 90% of the vote: they are both simply “Democratic.” It would therefore have the Court refrain from distinguishing between a map that pairs one district where statewide Republicans average 100% of the vote with two districts where statewide Democratic candidates average 75% of the vote, on the one hand, and one that draws one district where statewide Republicans average 52% of the vote and two districts where statewide Democrats average 51% of the vote, on the other hand.

Third, the Respondents' Expert Reports would treat a map with nine districts where statewide Democratic candidates average 50.1% of the vote and one district where statewide Republican candidates average 49.9% of the vote as being fundamentally dissimilar from a map with three 50.3% Democratic districts, two 50.2% Democratic districts, and five 49.9% Democratic districts. They would call the first map a 9-1 Democratic map and the second map a 5-5 Democratic map. Assuming *arguendo* that 50% was, in fact, the threshold defining the boundary between races where Republicans were favored to win and Democrats were favored to win, any analysis should view both maps as simply containing ten tossup districts; they might further estimate that both maps would tend to elect five Republicans and five Democrats to Congress.

A final example ties this in directly with these maps: The ensembles expect a congressional plan's seventh-most Democratic district to be one where statewide Democrats win, on average, between 51% and 55% of the vote. The Enacted Plan creates a district where Democrats win, on average, 58% of the vote. It is obvious that there is a world of difference between a district where (statewide) Democrats win 51% of the vote on average and districts where those Democrats win 58% of the vote, on average. But Respondents' Experts urge this Court to be indifferent between those two districts and classify them both as simply "Democratic." That is an inaccurate way to approach election classification.

B. Using 50% Of A Party's Average Statewide Vote Share As A Threshold Misclassifies Elections

Second, even if Respondents' experts were correct that we should look at races through the dichotomous lens of "Republican" and "Democrat," the 50% threshold that they employ as their classification boundary is the wrong threshold to use. Remember, the index provided is not based on congressional elections, but rather is an average of statewide elections conducted over a span of election cycles.³ People who study elections for a living know that a district where Andrew Cuomo, or Hillary Clinton, or Joe Biden wins 51% of the vote is not *necessarily* likely to elect a Democrat to Congress. In fact, given that Biden won nationally by four points, we would probably conclude that a district where Biden won 51% of the vote has a slight Republican tilt to it overall.

³ We use statewide races because it helps to control for things like candidate quality, fundraising, and incumbency in a uniform way across the State.

Candidates can have unique appeal in a State, face an unusually weak opponent, or run in a particularly good year for Democrats (such as 2018) or a particularly bad year for Democrats (such as 2010). To revisit our example of Charlie Baker, while it would be useful to know whether a legislature draws an unusually large number of districts where he performed poorly, it would be a terrible error to classify the districts that he won as “Republican.” Baker carried all but one of the State’s districts, often by overwhelming margins, but Massachusetts has not elected a Republican to Congress since 1996.⁴ In other words, classifying districts he won as “Republican” would grossly overstate the likely Republican performance in those districts.

A careful examination of the data confirms that this is exactly what happens when using these data to try to classify districts as “Republican” or “Democratic” in New York by using 50% as our classification boundary. The following table provides the Democratic vote share in districts in every congressional election in New York over the past three election cycles, sorted by that district’s score in our index.⁵ Notably, Republican candidates have won every congressional election in seats where statewide Democratic candidates have averaged less than 50% of the vote, excepting a narrow loss in one district in the unusually good Democratic year of 2018. They have won more than half of the elections in districts where statewide Democratic candidates have averaged between 50% and 55% of the vote. While they do not win either of the seats in the mid-to-high 50s, they are occasionally competitive in them. Democrats run behind the average of their statewide candidates in 2/3 of all races where they faced opposition; most of the races where they ran ahead of that average fall in the very good Democratic year of 2018.

⁴ See <https://docs.google.com/spreadsheets/d/17yr9mcAtuUdNjI9NEPYKxXsEldzzQ2ZaDwEAbnPRyS4/edit#gid=46011824>.

⁵ We examine the last three cycles because those are the years that have statewide races included in our index. But the trend continues back to the beginning of the decade: Republicans almost always win in districts up to roughly a 53% threshold in our index, and are competitive/capable of winning in districts up to roughly a 55.5% threshold.

Table 1: Democratic Vote Share in Districts, By Index
2012-2020 Runs

District	Index	Democratic Share 2020	Democratic Share 2018	Democratic Share 2016
27	42.89%	39.50%	49.81%	32.80%
23	46.63%	41.61%	45.76%	42.40%
21	46.85%	41.16%	43.06%	31.55%
22	47.15%	50.00%	50.89%	46.86%
1	50.39%	45.14%	47.93%	41.04%
19	51.44%	55.91%	52.68%	45.75%
2	51.76%	46.51%	46.89%	37.54%
11	52.05%	46.86%	53.23%	37.37%
18	53.60%	56.36%	55.47%	55.60%
24	55.66%	44.72%	47.37%	39.44%
3	57.68%	56.30%	58.98%	52.80%
4	59.34%	56.63%	61.33%	55.76%
20	59.95%	61.17%	66.50%	67.90%
25	61.21%	60.24%	58.98%	56.16%
17	63.50%	62.72%	100.00%	100.00%
26	64.89%	70.90%	73.34%	74.60%
6	69.63%	67.98%	100.00%	72.98%
16	78.06%	100.00%	100.00%	100.00%
14	81.01%	72.32%	85.17%	88.88%
10	81.60%	75.52%	82.15%	78.08%
12	85.69%	83.15%	87.72%	87.16%
9	87.21%	83.97%	89.67%	100.00%
5	88.04%	100.00%	100.00%	86.79%
8	88.27%	84.83%	100.00%	100.00%
7	89.29%	85.45%	100.00%	90.79%
13	93.73%	92.12%	94.60%	92.77%
15	93.88%	88.88%	95.99%	96.45%

If we are somehow not yet convinced that classifying any seat where statewide Democratic candidates have averaged more than 50% of the vote as “Democratic” for purposes of congressional elections is mistaken, we can be more rigorous. A simple regression analysis of Democratic vote share in a district election on the index yields the following result, which suggests Republican vote share would be expected to remain above 50% up to the point where statewide Democratic candidates begin to average around 53% of the vote. Of course, this is simply a “break-even point,” as Republicans would remain competitive in districts with even higher indices.

Table 2: Regression of Partisan Index on Democratic Vote Share¹

Characteristic	Beta	95% CI ²	p-value
(Intercept)	-0.06	-0.11, -0.01	0.030
index	1.1	1.0, 1.1	<0.001

¹ R² = 0.9139

² CI = Confidence Interval

We can, of course, build more complex models; given the near-perfect separation in the data, use of logistic regression analysis to classify districts directly as “Republican” or “Democratic” is unreliable, but perhaps utilization of a support vector machine would give slightly different answer. We could also incorporate variables such as incumbency to potentially improve the (already high) fit. There is a veritable rabbit hole of analysis we could go down classifying a district as “Republican” or “Democratic,” before even engaging in the question of what would constitute a “competitive” district in a quantitative sense. This subjectivity is part of why I avoid this approach. Regardless, there is no reason to believe any technique would reveal an answer other than what we can intuit from our naked eye: “Republican District” does not line up with a 50% cutpoint in our index.

Overall, a correct interpretation of the ensemble data—if we were to go down the “classification route”—would be to take 53% as the threshold at which Democratic wins become more likely than Republican wins, and 55.6% as the point at which Republicans have no chance at winning whatsoever. Using those points, the ensemble predicts that, overall, maps drawn without partisan intent would produce *on average* six districts where Republicans would be favorites to win and nine districts where they would at least be competitive. It predicts that, overall, maps drawn without partisan intent would produce *as many* as eight seats where Republicans would be favorites to win, and twelve where they would be competitive (although such results would be outliers).

This stands in stark contrast to the reality of the Enacted Plan, which creates just four districts where Republicans would be favored and five where they would have a chance at winning (the index in the fifth-most Republican district in the Enacted Plan is 54.9%, barely in the range of races where Republicans would have a chance). In other words, a proper system of classifying “Republican” and “Democratic” districts would actually confirm what our common sense should

tell us: That the outlying Gerrymandering Index score for the Enacted Plan is a result of the legislature aggressively targeting competitive and Republican-leaning seats.⁶

To drive home the point that these maps were clearly not drawn to favor Republicans, consider the following table. It shows the partisan index under the old lines, the partisan index under the new lines, and is sorted by the amount that index shifted to either the left or right. I have also included a metric for the Cook Partisan Voting Index (PVI), which elections analysts actually do employ to measure whether a district will send Republicans or Democrats to Congress, under both the new and the old lines.⁷ Finally, the table lists the 2020 congressional winner in each district and the amount of the old district core retained.

⁶ Again, these averages and maxima are estimated from a set of elections where, overall, Republicans fared quite poorly.

⁷ Cook PVI looks at how much more Republican or Democratic a district was than the country as a whole in the last two presidential elections. Donald Trump received 49% the popular vote (excluding third parties) in 2016 and 48% in 2020. Assume Donald Trump tied with the Democratic candidate in both years. PVI helps to correct for national forces by noting that the district was a point to the right of the country in 2016 and two points to the right in 2020, for a PVI of R+1.5. PVI is a reasonably strong classifier: Democrats currently hold every district with a Democratic-leaning PVI but six; Democrats hold 20 of the Republican-leaning PVIs (this Democratic bias reflects the fact that Democrats have had two good election cycles in a row). This is available on Cook's subscription-only website.

Table 3: Summary of New and Old Districts

District	Old District Index	New District Index	Change	Old District Cook PVI	New District Cook PVI	2020 Winner	Core Retention
11	52.05%	61.50%	9.45%	R+7	D+4	Nicole Malliotakis (R)	74.78%
1	50.39%	58.10%	7.71%	R+6	D+2	Lee Zeldin (R)	53.22%
24	55.66%	60.15%	4.48%	D+2	D+6	John Katko (R)	69.10%
19	51.44%	55.90%	4.46%	R+3	D+2	Antonio Delgado (D)	47.52%
3	57.68%	59.30%	1.62%	D+3	D+5	Thomas Suozzi (D)	72.23%
18	53.60%	55.00%	1.40%	R+1	D+1	Sean Patrick Maloney (D)	70.84%
14	81.01%	82.05%	1.04%	D+25	D+27	AOC (D)	83.01%
10	81.60%	81.76%	0.17%	D+27	D+27	Jerrold Nadler (D)	69.77%
13	93.73%	93.88%	0.15%	D-40	D+40	Adriano Espaillat (D)	82.89%
12	85.69%	85.72%	0.02%	D+34	D+34	Carolyn Maloney (D)	83.24%
4	59.34%	59.30%	-0.04%	D+4	D+4	Kathleen Rice (D)	96.68%
7	89.29%	89.11%	-0.18%	D+34	D+34	Nydia Velazquez (D)	66.68%
6	69.63%	69.37%	-0.26%	D+13	D+13	Grace Meng (D)	95.54%
25	61.21%	60.77%	-0.44%	D+8	D+8	Joe Morelle (D)	92.76%
5	88.04%	87.34%	-0.71%	D+34	D+32	Gregory Meeks (D)	95.60%
26	64.89%	63.96%	-0.93%	D+10	D+9	Brian Higgins (D)	95.56%
27	42.89%	41.31%	-1.57%	R+12	R+13	Chris Jacobs (R)	55.02%
20	59.95%	58.35%	-1.60%	D+7	D+6	Paul Tonko (D)	84.60%
15	93.88%	91.94%	-1.94%	D+39	D+38	Ritchie Torres (D)	77.36%
9	87.21%	84.57%	-2.64%	D+32	D+29	Yvette Clark (D)	78.34%
21	46.85%	43.52%	-3.33%	R+8	R+12	Elise Stefanik (R)	62.51%
17	63.50%	60.14%	-3.36%	D+9	D+5	Mondaire Jones (D)	73.63%
8	88.27%	84.47%	-3.80%	D+33	D+28	Hakeem Jeffries (D)	82.51%
23	46.63%	41.65%	-4.98%	R+9	R+13	Tom Reed (R)	64.64%
2	51.76%	46.10%	-5.66%	R+5	R+10	Andrew Garbarino (R)	57.11%
16	78.06%	71.86%	-6.20%	D+25	D+18	Jamaal Bowman (D)	77.52%
22	47.15%	—	—	R+9	—	Claudia Tenney (R)	—

To accept the theory of the Respondents’ Expert Reports, one must accept that it is merely a coincidence that all districts that shift leftward by more than a point are either held by Republicans or potentially vulnerable Democrats. One must accept that it is merely a coincidence that almost every district that shifts rightward is either very likely to elect a Republican already or is overwhelmingly Democratic. Respondents’ Expert Reports require a conclusion that it is just a coincidence that every district whose PVI shifts its basic underlying orientation flips from Republican to Democrat (this occurs in Districts 1, 11, 18 and 19).

One must also accept that close to every district with less than 70% core retention is a district where Democrats pack Republicans (Districts 2, 23, 21, 27) or a previously competitive district that they move sharply leftward (Districts 19, 24, 1). The only exception is Rep. Nydia Velazquez's district, which gives up a substantial number of Democratic voters to the Republican-held Eleventh District, while remaining heavily Democratic. Simply put: An independent fact-finder would have to struggle mightily to miss what is hiding in plain sight here.

V. Addressing The "Missing Constitutional Requirements" Does Not Change The Analysis

All three of Respondents' Expert Reports observe that the ensemble maps are not explicitly constrained by every constitutional requirement in New York. This all misses the mark.

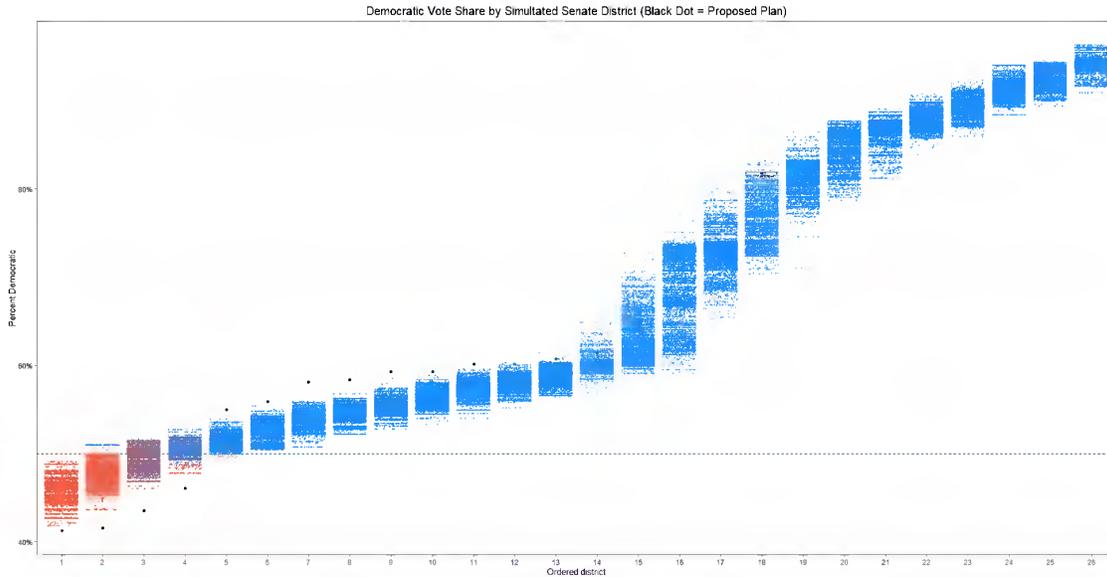
A. Respondents' Expert Reports Offer No Counter-Maps

Every one of Respondents' experts is more than capable of either re-running the relevant simulation algorithm that I employed or executing a competing algorithm; one of the authors does just that. Thus, while every one of Respondents' experts could readily demonstrate that changing these assumptions or fixing the purported omissions might lead this Court to arrive at different conclusions about the gross partisan bias animating the Enacted Maps, none does so. The silence is deafening. As it turns out, if you include the constraints about which Respondents complain to the simulations, it makes no difference.

B. Controlling For Municipal And Town Lines Makes No Difference

The New York Constitution demands that maps "consider" municipalities and town lines, although, unlike other constitutional provisions such as compactness or contiguity, it does not make respect for them mandatory. N.Y. Const. art. III §4(c)(5). It is also unclear whether the simulations really need to give deference to this as the Enacted Plan does not seem to either, splitting, as it does, six of the ten towns in Suffolk County and all three towns in Nassau County (it does keep the two cities intact). Regardless, any of Respondents' experts could have run simulations to see what impact respecting municipalities or town lines might have had.

As it turns out, that answer is "none." It is possible to "freeze" portions of the map together so that they cannot be split. To enable this, an additional set of 10,000 simulations were run that favors keeping intact every municipality that the Enacted Map keeps intact. As you can see, the results do not change appreciably.



C. The Simulation Ensemble Sufficiently Protects Minority Voting Rights

Dr. Ansolabehere offers additional criticisms of the ensembles with respect to the protection of “ability-to-elect” districts, though they too fall short.⁸ It is worth stepping back to take a simplified view of the confusing and seemingly ever-changing rules of what is required by the Voting Rights Act (“VRA”). The VRA requires the creation of districts that can elect the candidates of choice of a minority group when such a group: (a) is “sufficiently large and geographically compact to form a majority in a single-member district;” (b) is “politically cohesive” (that is, its members tend to vote the same way); and (c) the majority votes as a bloc to defeat the group’s candidate of choice. *Thornburg v. Gingles*, 478 U.S. 30 (1986). It is unclear (a) whether the VRA requires the creation of districts where multiple minority groups can form a cohesive majority (though the majority rule among circuits is that it does); (b) what precisely a “geographically compact” minority group means; and (c) whether the remedial district must comply with the first *Gingles* prong, *but see Cooper v. Harris*, 137 S. Ct. 1455 (2017) (suggesting that it possibly does not). Layered on top of that are two additional considerations: The New York Constitution requires that maps not abridge minority groups’ voting rights, which may or may not

⁸ Dr. Tapp muses that it is his “understanding that counting minority-majority districts is a crude and incomplete proxy for the ability of minority voters to elect their candidates of choice,” Tapp Report ¶ 46, even though Dr. Tapp outright concedes that he is “not an expert on the Voting Rights Act,” (which likely should have ended his analysis). Indeed, it is unclear to me how Dr. Tapp, who is a math professor and not a social scientist, would have expertise to opine on any of these “missing requirements.”

be evaluated under a different test than *Gingles*, while the Fourteenth Amendment to the U.S. Constitution prohibits States from drawing districts with race as a predominate factor, unless they satisfy strict scrutiny (compliance with the VRA presumably does so). *Shaw v. Reno*, 560 U.S. 630 (1993).

Against this backdrop, Dr. Ansolabehere's criticism that I offer no evidence that the majority-minority districts drawn by the maps are required by the VRA, Ansolabehere Report ¶¶ 17, 63, fails to connect. Since these maps are, by definition, drawn without respect to race, there are no Fourteenth Amendment concerns raised here, as there is, to my understanding, no prohibition against creating majority-minority districts where the VRA does not require them if it is done without using race as the predominate factor (or, in this case, without using race at all).

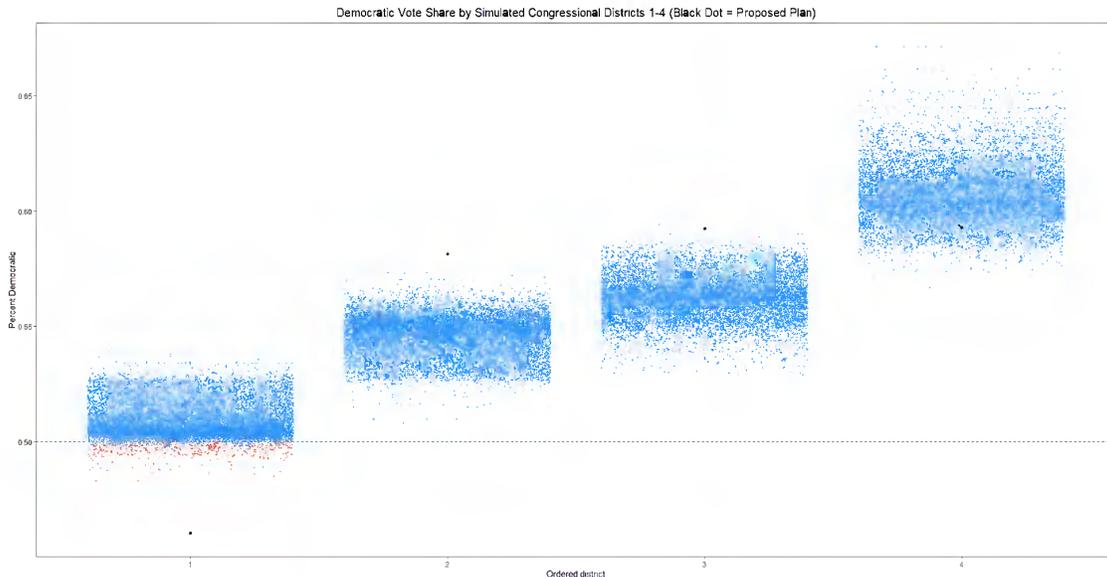
Dr. Ansolabehere's suggestion in paragraph 64 of his report that there is no analysis of whether districts in the simulation will, in fact, perform must be viewed in the context of the record here: there is no evidence proffered by any party of racially polarized voting in New York City or in particularized boroughs, nor is there evidence that any single minority group can form a reasonably compact majority in a district. In other words, on this record, we likely could have simply ignored the VRA altogether. Instead, I utilized majority-minority status as a stand-in for ability-to-elect, since only two districts under the 2012–2020 lines where white New Yorkers are a majority—one of which is the 82% non-Hispanic white New Yorkers Nineteenth District—send a Person of Color to Congress. Of course, if Respondents or their experts believed that there were districts or groups that needed to be protected, they could have identified them or, better yet, identified them and run the simulations to see what would happen if ability-to-elect districts were preserved.

To that end, I have produced additional simulations that, following the lead of Dr. Imai (see reports linked below), freeze certain districts in place in the same manner as the current map, thus removing them from the discussion. At the instruction of counsel, these simulations freeze the districts in the Enacted Plan that are plausible candidates for protection under the VRA or the State Constitution. To be more direct, they remove all of the census blocks from the maps that are contained in Districts 5, 6, 7, 8, 9, 13, 14, 15 and 16. These nine districts are the plausible ability-to-elect districts, where non-Hispanic white New Yorkers are a minority; where a single minority group is either a majority, plurality, or near-plurality of the Voting Age Population (the Sixteenth District is the only one in the former category); and where a Person of Color is currently elected

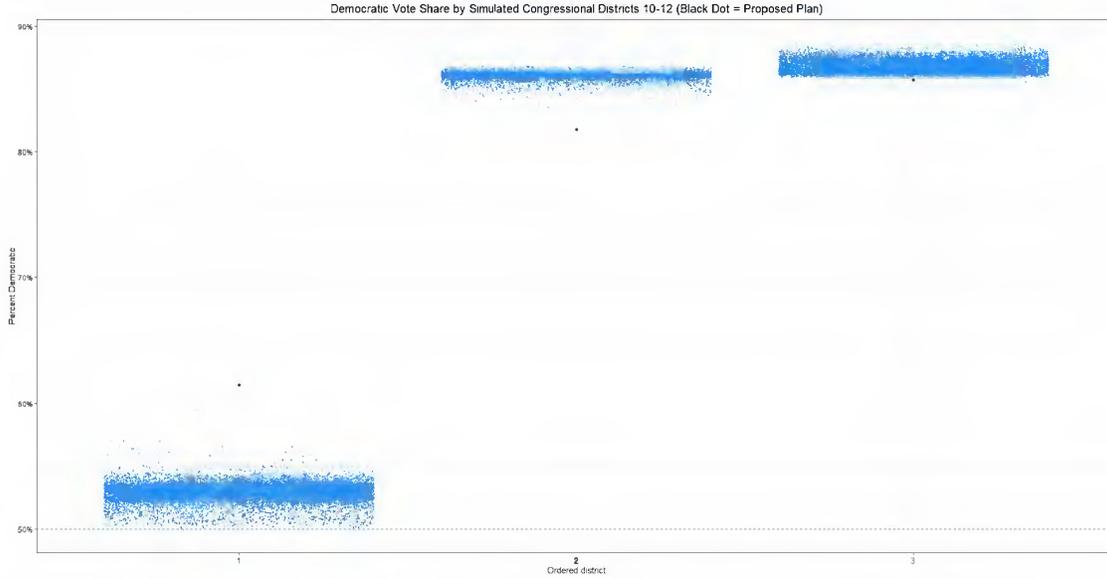
to Congress. If they are not VRA-protected, no harm is done by freezing them, except for possibly making Petitioners’ case more difficult. All of the remaining non-frozen districts are non-Hispanic White Voting Age Population majority districts, and in all but one (the Tenth District), a single minority group never constitutes even a quarter of the Voting Age Population.

In short, the following simulations protect minority voting rights at least as well as do the current maps. Notably, they also concede a fair amount of ground to the Legislature, as each map in the following simulations accepts the Legislature’s decision to pair Yorktown with Yonkers in the Sixteenth District, and to crack Republican-leaning areas in Midwood and Sheepshead Bay between the Ninth and Eighth Districts. If anything, this is a “worst-case” scenario for Petitioners.

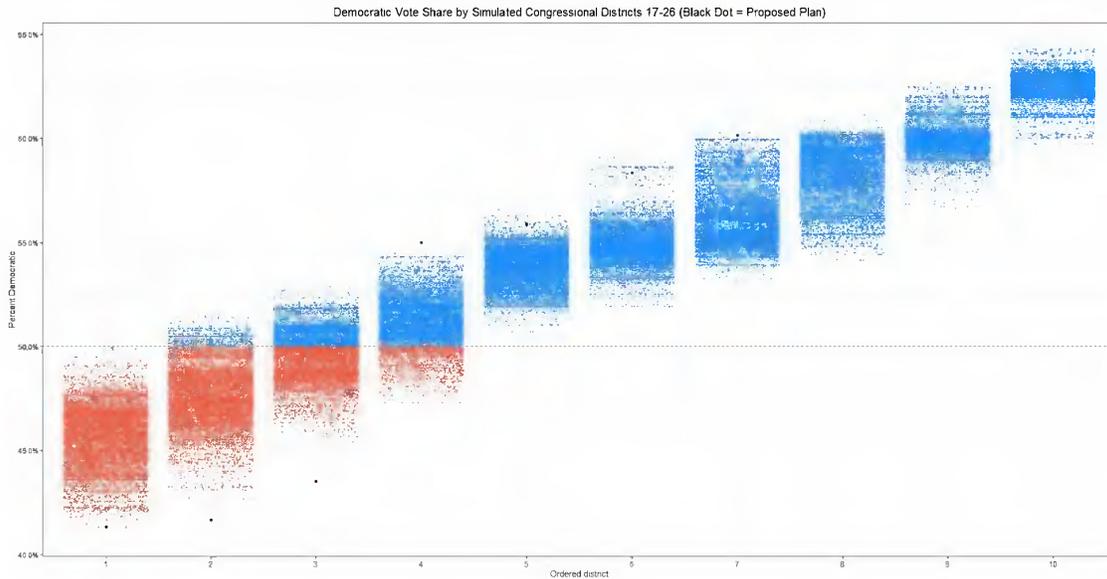
Because the remaining precincts are non-contiguous, the simulations were run in three batches (this follows the approach of Dr. Imai in his recent South Carolina report, and Dr. Barber’s approach in his North Carolina report). All other constraints are the same as in the original simulations, except that we now run 10,000 simulations, and municipalities are protected at least as well as in the Enacted Plan (*i.e.*, intact municipalities in the Enacted Plan are “frozen” together in the ensemble). The first batch simulates four districts in the precincts that currently make up the First, Second, Third., and Fourth Districts. As one can easily see, there is strong evidence of gerrymandering within this grouping, with the most Republican district made significantly more Republican than we would expect, allowing the two remaining districts to be pushed substantially to the left of our expectations, and eliminating two competitive districts in the process:



Likewise, in the grouping of Districts 10, 11 and 12 we can see how the two safely Democratic districts are made more Republican than expected (but are still safely Democratic) while the remaining district is pushed well out of expectations into safe Democratic territory.



Upstate New York (Districts 17 through 26) shows the same pattern described in the initial report:



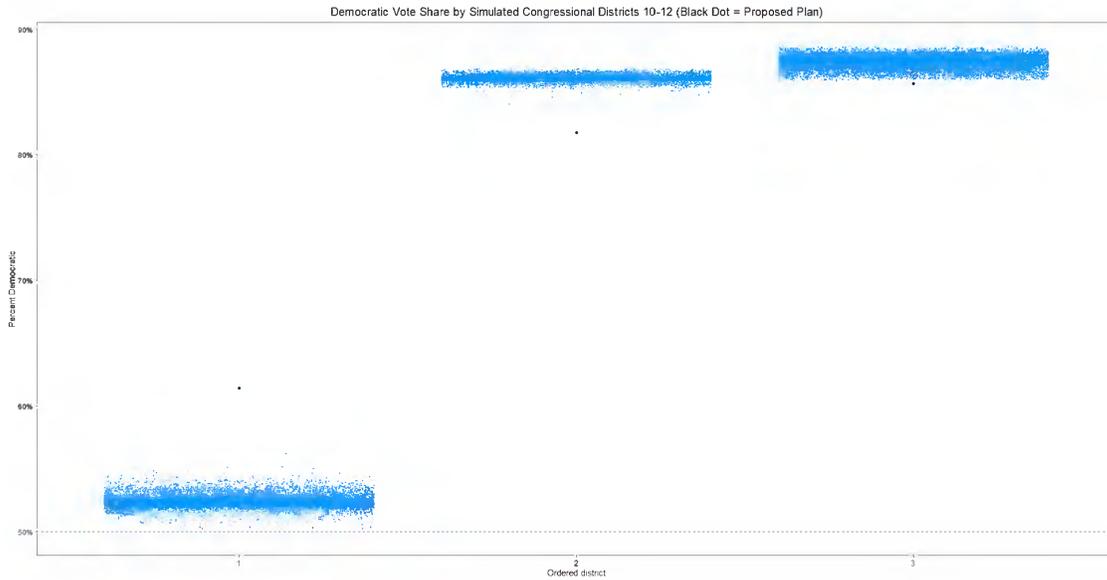
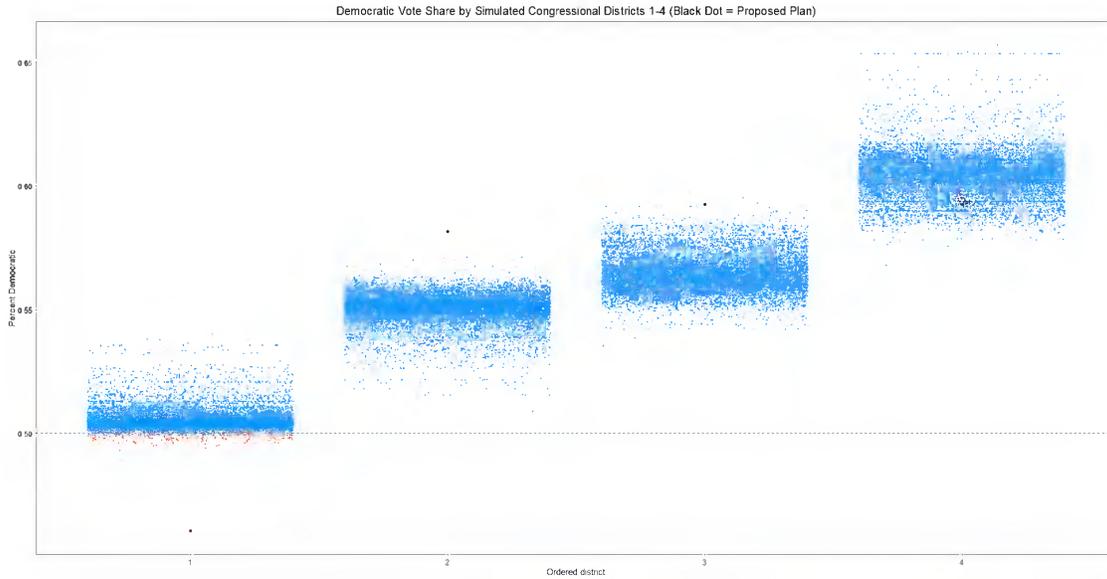
D. Respondents' Experts Offer No Evidence That "Considering" Communities Of Interest Or Core Retention Would Alter The Partisan Balance In The Simulations

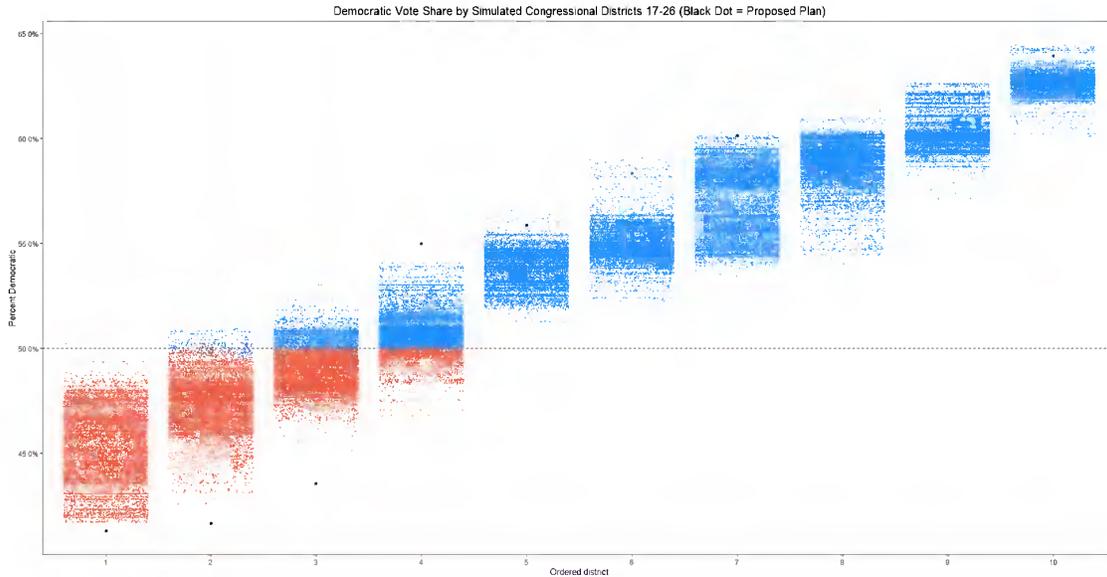
Communities of interest are a notoriously difficult concept to nail down, as they typically have a vague definition such as "[s]ocial, cultural, racial, ethnic, and economic interests common to the population of the area, which are probable subjects of legislation." *See, e.g.*, Kan. Office of Revisor of Statutes, *Proposed Guidelines and Criteria for 2022 Kansas Congressional and State Legislative Redistricting* (May 20, 2021).⁹ That makes them vulnerable to *ad hoc* reasoning ("this is the district we want, find a community of interest to justify it") and difficult to encode, since they lack formal definition.

In any event, I was not asked to look at communities of interest by counsel. I presume this is because there are disputes about the degree to which the Enacted Maps consider communities of interest and other constitutional requirements. If there are indeed important communities of interest to be protected, however, any of Respondents' experts could program a simulation that respected those communities of interest and potentially harm Petitioners' case. At the very least, they have not provided any analysis suggesting a different result would be reached.

While Dr. Ansolabehere may be correct that the Enacted Congressional Map overall exhibits a high degree of core retention, Ansolabehere Report ¶ 38, a more accurate statement, as shown above, would be that the map offers a high degree of core retention in heavily Democratic districts, but pulls apart Republican districts, when possible, Trende Report at 12. That is not something we would wish to replicate. In any event, the redistricting simulation that I used does allow researchers to direct the ensemble to prefer maps with stronger core retention. In addition to the constraints above, I have instructed the simulations to draw maps that consider district core retention. The analysis once again does not change.

⁹ <https://redistricting.ils.edu/wp-content/uploads/KS-Proposed-redistricting-guidelines.pdf>.





A map drawn without respect to partisanship would tend to draw between six and twelve districts in our competitive-to-Republican range of less than 55% in the index. The Enacted Plans draw four. This is because they are obvious and aggressive partisan gerrymanders that target Republicans and competitive districts.

E. Conclusion

Contrary to the suggestion of Respondents’ Expert Reports, the initial ensemble was not biased because it failed to expressly consider race, city or municipal boundaries, or other factors. Even after conceding, for sake of argument, that 35% of the districts in the map must be drawn exactly as they were drawn by the Legislature to protect minority voting rights, and after conceding that municipalities should be split or kept intact in the same way as the Legislature suggests, and after conceding that previous district cores should be strongly considered, the map still appears to be a gross outlier whose boundaries are inexplicable save through a desire to disadvantage the Republican Party and reduce the number of competitive districts.

VI. Further Response To The Tapp Report

The Barber and Ansolabehere Reports restrict their analyses to the two issues raised above. The Tapp Report continues with a number of similarly meritless attacks.

The Tapp Report’s Critique Of My Credentials Misunderstands The Role Of The Expert

It is ironic that Dr. Tapp embarks upon an attack on my expert credentials, given that such analysis is typically reserved for lawyers and the Court, and given that he is not a lawyer (unlike

myself).¹⁰ I believe my c.v. and previous expert work speaks for itself but will, of course, leave that determination to the Court and the attorneys.

The only criticism that Dr. Tapp levies that is relevant to his actual area of expertise is his suggestion that I do not display a sufficiently deep understanding of the underlying algorithm, because the Trende Report suggests that spanning trees are constructed by breaking adjacencies, that more than two precincts will always have multiple spanning trees, and that algorithms are “potentially subject to a variety of parameters.” Tapp Report ¶ 38 (quoting Trende Report at 7). In general, Dr. Tapp seems to think that the Trende Report simplifies things because its author does not understand the material.

Had Dr. Tapp read the Trende Report with sufficient care, he would have noticed the phrase “[t]o simplify greatly” and the admonishment that “the math is quite complicated.” Trende Report at 9. He should have noticed the use of scare quotations around the term “break” before talking about adjacencies, which typically alert a reader that a word is not being used in an exact way. *Id.* at 8.

There is a reason for these simplifications. The role of the expert in New York is to “help to clarify an issue calling for professional or technical knowledge, possessed by the expert and beyond the ken of the typical [finder of fact].” *De Long v. County of Erie*, 60 N.Y.2d 296, 307 (1983). Reasonable minds can disagree on how to approach this, but my view—shared by at least some of Respondents’ experts—is that detailed discussions of methodologies, using the precise jargon typical of an academic conference, is neither helpful nor clarifying of any issue. There is nothing wrong with including an exposition on McCartan & Imai’s utilization of Wilson’s Algorithm in a report, but I am unsure what that would accomplish. Nor is there anything wrong with explaining the gerrymandering index in terms of vector math, as the Tapp Report does, Tapp Report ¶¶ 19–22. But, in my experience, discussion of vectors, three-dimensional space, and

¹⁰ It is also ironic that Tapp criticizes my lack of a Ph.D. and peer-reviewed articles, Tapp Report ¶¶ 36–37, given that he is a math professor whose c.v. suggests that he, unlike me, lacks a graduate degree in political science (or any related field); has never taught a course on participation and turnout, or any course involving elections; has never advised, directly or indirectly, a redistricting commission or Court; has never studied or advised a body about the Voting Rights Act; has never drawn an actual enacted map; has never analyzed a district’s competitiveness to determine whether it is likely to elect a Republican or Democrat; has never testified as an expert; and has a c.v. that fails to display any professional or even hobbyist-level interest in political outcomes or gerrymandering until two years ago. He does appear to have participated as a plaintiff for a Democratic-aligned plaintiffs’ group in a case where I served as an expert for *amici*. See, e.g., <https://www.pacourts.us/Storage/media/pdfs/20220125/200409-jan.24,2022-amicusvotersofthecommonwealth.pdf>.

Euclidean distance—while precise—tends to be less illuminating for most observers than my simplified description. Trende Report at 12–13.

Moreover, other experts—including one of the authors of Respondents’ Expert Reports—have taken similar approaches in court-accepted reports. Dr. Imai frequently only mentions spanning trees in passing in an appendix, without attempting to explain what they are. Affidavit of Dr. Kosuke Imai, Ex. A at 30–31, *League of Women Voters of Ohio v. Ohio Redistricting Comm’n*, No. 2021-1193 (Oct. 22, 2021);¹¹ Expert Report of Kosuke Imai, Ph.D., at 26–27, *NAACP v. McMaster*, No. 3-21-cv-03302 (D.S.C. Jan. 24, 2022). Respondents’ expert, Dr. Barber, foregoes any discussion of spanning trees; indeed, his reports often opt to avoid discussion of the mechanics of Sequential Monte Carlo (“SMC”) altogether. Affidavit of Michael Barber at 20–24, *North Carolina League of Conservation Voters, et al.*, Nos. 21 CVS 015426, 21 CVS 500085, (Dec. 22, 2021).¹² This does not mean that they are ignorant of these mechanics. It means that they understand the role of the expert in litigation.

In any event, the Tapp Report is correct that spanning trees are not created by removing adjacencies; I could have more precisely used the language of graph theory and discussed removing edges, McCartan & Imai, *Sequential Monte Carlo for Sampling Balanced and Compact Redistricting Plans* at 6 (Aug. 17, 2021), though using the term “edges” to refer to the lines connecting the precincts (or, to be more precise, vertices) rather than the edges of the precincts themselves is confusing for most observers. Of course, that’s also not how spanning trees are constructed directly, and the Trende Report never claims as such. It seemed a useful way to help the Court conceptualize what a “spanning tree” is, in the event that it had not previously encountered the term. The Tapp Report is also technically correct that not all groups of more than two precincts would have more than one spanning tree. A sequence of precincts arranged in a line would only have one tree, although I doubt if such a situation exists in the “real world.” Finally, the Tapp Report is probably correct that the Trende Report uses the term “parameters” to refer to the values set in the algorithm imprecisely. I do not understand why this is a problem, however, given that the Tapp Report also refers to the algorithm’s parameters. *See* Tapp Report ¶ 52

¹¹ https://vhdsfh2oms2wcnsvk7sdv3so.blob.core.windows.net/thearp-media/documents/Affidavit_of_Dr._Kosuke_Imai_10.22.21_2TeveP4.pdf.

¹² https://vhdsfh2oms2wcnsvk7sdv3so.blob.core.windows.net/thearp-media/documents/Expert_Report_of_Michael_Barber_12.22.21.pdf.

(“Depending on how its parameters are set, the McCartan-Imai algorithm is capable of sampling from the uniform distribution.”).

The Amount Of Specificity About The Algorithmic Choices Employed In The Trende Report Is Typical Of Expert Reports, Including Reports Offered By Respondents’ Experts

The Tapp Report complains about the lack of reproducibility of the Trende Report, based on the description of choices made. This is odd, given that Dr. Barber manages to adequately replicate the findings of the Trende Report. Regardless, in constructing the report, I considered the level of detail typical of other reports that I have encountered in my experience as an expert in redistricting cases. Upon further review, the choices that I describe are provided at a level of detail similar to those provided in Dr. Barber’s previous reports (linked above).

The Tapp Report’s Methodological Complaints are Unfounded

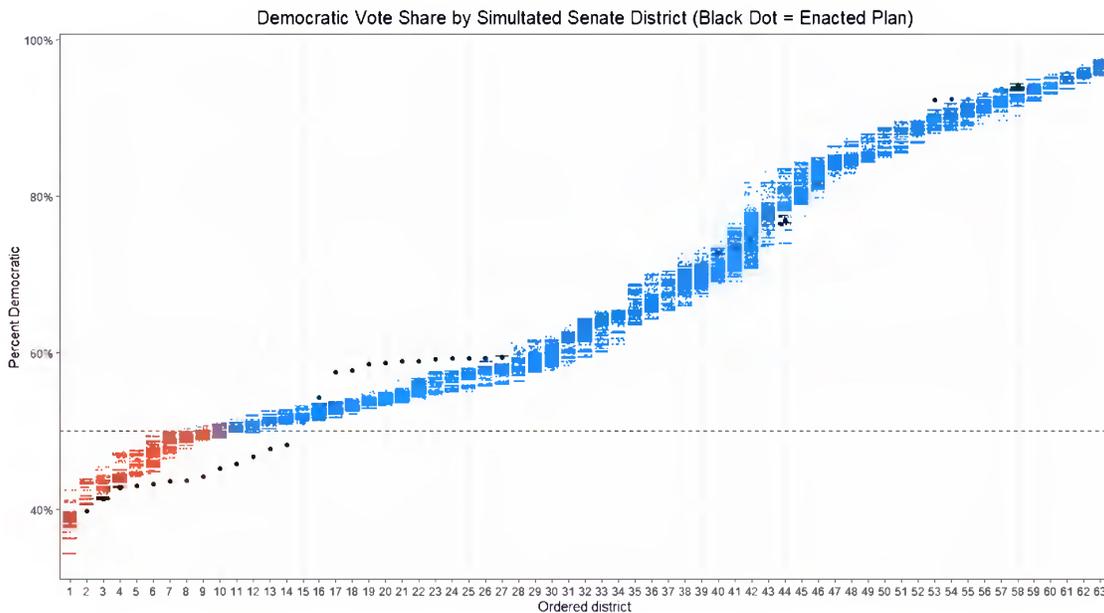
The Tapp Report complains that the Trende Report does not expressly state its target distribution. This is hand-waving. As with most of his other complaints, it misunderstands the nature of the endeavor. Dr. Imai’s reports (cited above) relegate any mention of target distributions to the appendices, and never spell out his target distribution; Dr. Barber’s reports don’t mention the idea of a target distribution whatsoever. Regardless, Dr. Tapp never suggests what difference, if any, utilizing a different target distribution might make. He of course would not have to reproduce my analysis exactly, or at all, to do so. He could simply have explored different sets of constraints and distributions and demonstrated that some reasonable set of constraints/distributional assumptions would result in an ensemble of maps that resemble the partisan distribution of the Enacted Maps. Again, all three of Respondents’ experts are more than capable of doing this. None has produced the results of any such analysis.

The Tapp Report concludes by suggesting that traditional Markov Chain Monte Carlo (“MCMC”) simulations are better established, that SMC is new, and that a larger sample size might be preferable. This is another hand-waving exercise. If Dr. Tapp truly believed that MCMC simulations would yield a different result, he could easily have performed them himself and potentially helped Respondents’ case considerably. He does not. While he might believe that 5,000 simulations are possibly insufficient (he does not go so far as to say that running 5,000 simulations is disqualifying), Dr. Imai clearly believes that number is sufficient, as that is the standard number of simulations that he has run and that courts have accepted when considering his analyses (see citations above). Regardless, in this report, all follow-up simulations are

performed with 10,000 simulations, rather than 5,000 simulations. Unsurprisingly, the results are unchanged.

VII. The Same Analysis Holds True For The Senate Map

Respondents' Experts ignore the Senate map, but the same analysis holds true there. The Enacted Senate map conforms closely to the expected distribution of vote shares in districts except where it matters most: in the 40% to 60% range, where the maps once again produce an unusually large number of districts where statewide Democrats have averaged around 60% of the vote. Remember, it would be a mistake to use a 50% threshold to classify the districts in the ensembles as either Republican or Democratic. Using our thresholds of 53% and 55.6%, we would expect there to be around 17 districts where Republicans would be favored to win and 21 districts where they would be competitive. Instead, the Enacted Senate Map packs Republicans into seats where they would be overwhelming favorites to win, providing just 15 seats where they would be favored overall and 16 where they would be competitive. This is consequential, as it effectively locks in a veto-proof Democratic majority in the Senate.



VIII. Conclusion

This is the rare instance where a respondent's expert work actually strengthens a petitioners' case. Even using Respondents' Experts' preferred set of constraints and preferred methodologies, the maps still clearly were primarily drawn to reduce the number of Republican and competitive districts. None of the conclusions in the Trende Report need to be adjusted or changed.


SEAN P. TRENDE

Dated: March 1, 2022