

July 2, 2011

## Note to the Court

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

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

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

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

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

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

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

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

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

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

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

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

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