

SUPREME COURT
OF THE
STATE OF CONNECTICUT

S.C. 18907

**IN RE PETITION OF REAPPORTIONMENT COMMISSION, EX. REL.
PROCEEDINGS BEFORE SPECIAL MASTER**

**BRIEF OF THE COALITION FOR MINORITY REPRESENTATION
STATEWIDE, ET AL IN SUPPORT OF REDISTRICTING PLAN SUBMITTED
TO SPECIAL MASTER**

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TABLE OF CONTENTS

Facts and Argument.....	1
Conclusion.....	4

FACTS AND ARGUMENT

The Coalition for Minority Representation Statewide consists of community leaders from Meriden, New Britain, Norwalk, and Bridgeport. The aim of the coalition is to ensure that African-American and Hispanic voters continue to have a fair opportunity to influence congressional elections throughout Connecticut. One virtue of the existing map is that it enables minority communities to play a significant role in the electoral politics of at least four out of the State's five congressional districts. The minimal adjustments necessary to bring the existing configuration into compliance with the equal population requirement need not and should not impair minority influence in any district. We therefore urge the special master to reject any plan that attempts to consolidate minority voters into fewer districts – isolating and weakening the minority communities in the rest of the state.

Under the existing map, the state's First, Third, Fourth, and Fifth congressional districts include significant minority populations. Together, African Americans and Hispanics account for more than 21 percent of the population in those four districts. Hispanics make up more than 12 percent of the population in all four. Non-Hispanic African Americans make up more than 11 percent of the population in the First, Third, and Fourth districts. These numbers have been sufficient to enable minority communities in four of the state's five districts to work effectively to advance their political aims and, at least sometimes, elect their candidates of choice.

Some of the proposals offered by members of the redistricting commission prior to the Supreme Court's Order of January 3, 2012 would significantly weaken the political influence of minority communities in the Fourth and Fifth congressional districts. One proposal (offered by the Republican members on November 28, 2011) would have moved

New Britain from the Fifth to the First and Bridgeport from the Fourth to the Third. Since New Britain and Bridgeport are home to large minority populations, the effect of moving those cities would be to significantly diminish the size of the minority communities remaining in the Fourth and Fifth districts. For instance, the November 28 proposal would have reduced the non-Hispanic African American population's share of the Fourth's total by more than half; the same proposal would have cut the Hispanic population's share of the Fifth's total by 30 percent. The First and Third districts would have seen corresponding increases in their minority populations, but the net effect would have been to consolidate minority influence into just those two districts – cutting from four to two the number of districts in which minorities are able to exert significant influence.

Indeed, the demographic data only begin to capture the impact on minority representation of severing cities like Bridgeport or New Britain from their current districts. Crucially, such changes would disrupt the relationships that have formed over the years among minority communities within the Fourth and Fifth. In the Fifth, for example, minorities in New Britain have historically allied themselves with like-minded communities in Meriden, Waterbury, and Danbury to achieve shared political objectives. Similarly, in the Fourth, the minority communities of Bridgeport, Stamford, and Norwalk have worked together to amplify their combined voice. A plan that fractures these coalitions would impair the political effectiveness of the minority voters who remain in the Fourth and Fifth districts.

Of course, any proposal to move a city like Bridgeport or New Britain out of its current district appears inconsistent with the Supreme Court's order that the special master modify the existing congressional districts "only to the extent reasonably required" to equalize their populations. The plans with the greatest impact on minority representation

are necessarily those that make dramatic changes to the existing configuration of congressional districts. Such proposals are precluded by the Supreme Court's order.

That said, we do not know what all the proposals submitted to the special master will look like. At this stage, then, our role is to emphasize and clarify some of the factors that the special master might consider in assessing competing proposals. Three related suggestions emerge from the discussion above:

1. Settled law and the Supreme Court's order require the special master to defer to the state policies reflected in the 2001 map. The 2001 redistricting plan embodies a policy of ensuring statewide minority representation, rather than consolidating minority communities into a few congressional districts. Thus, it is inconsistent with state policy to redraw the map so as to reduce the number of districts in which minority voters exert significant influence.

2. Courts and special masters charged with drawing new district maps often try to preserve the cores of existing districts. Respect for the identity of existing districts is especially appropriate where, as here, the Court has directed the special master to change the map as little as possible. In determining which cities and towns count as part of the "core" of a given district, the special master must consider each city's relationship to the district as a whole. New Britain is part of the Fifth's core, not least because it is one of a handful of population centers in the district in which minority voters are well-represented. The same is true for Bridgeport in the Fourth. A city or town recognized as a center of its district's minority population can fairly be counted as part of the district's core.

3. To the extent the special master considers "communities of interest" in choosing among a variety of least-change plans, we urge him to consider the history of

collaboration among the minority communities in the Fourth (Bridgeport, Stamford, and Norwalk) and Fifth (New Britain, Meriden, Waterbury, and Danbury) to achieve shared political ends. The special master should adopt a plan that leaves the relationships among these groups of towns intact.

CONCLUSION

As these suggestions demonstrate, our ideal – preserving opportunities for minorities to influence elections throughout the state – accords with the special master’s mandate to preserve as much as possible of the existing district configuration. Thus, we ask only that the special master adhere strictly to the Supreme Court’s order, taking care to avoid proposals that would significantly diminish the minority populations of particular districts.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I certify that this Brief complies with all the provision of Practice Book § 67-2.



David N. Rosen

Pursuant to Practice Book § 62-7, I hereby certify that a copy of the foregoing Brief of the Coalition of Minority Representation Statewide, et al has been emailed to the following:

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