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Attorneys for Plaintiffs

IN THE MATTER OF ESTABLISHMENT  
OF CONGRESSIONAL DISTRICTS BY  
THE NEW JERSEY REDISTRICTING  
COMMISSION,

DOUGLAS STEINHARDT, in his official  
capacity as Delegation Chair and Member of  
the New Jersey Redistricting Commission,  
MICHELE ALBANO, in her official capacity  
as Member of the New Jersey Redistricting  
Commission, JEANNE ASHMORE, in her  
official capacity as Member of the New  
Jersey Redistricting Commission, MARK  
DUFFY, in his official capacity as Member of  
the New Jersey Redistricting Commission,  
MARK LOGRIPPO, in her official capacity  
as Member of the New Jersey Redistricting  
Commission, and LYNDA PAGLIUGH, in  
her official capacity as Member of the New  
Jersey Redistricting Commission,

Plaintiffs,

vs.

NEW JERSEY REDISTRICTING  
COMMISSION, JOHN E. WALLACE, JR. in  
his official capacity as Chair and Member of  
the New Jersey Redistricting Commission,  
JANICE FULLER, in her official capacity as  
Delegation Chairwoman and Member of the  
New Jersey Redistricting Commission, IRIS  
DELGADO, in her official capacity as  
Member of the New Jersey Redistricting  
Commission, VIN GOPAL, in his official

SUPREME COURT OF NEW JERSEY

DOCKET NO.: 086587

**AMENDED COMPLAINT IN LIEU  
OF PREROGATIVE WRITS**

**PURSUANT TO ORIGINAL  
JURISDICTION OF THE  
SUPREME COURT OF NEW  
JERSEY UNDER ART. II, § II, ¶ 7 of  
the NEW JERSEY CONSTITUTION**

capacity as Member of the New Jersey Redistricting Commission, STEPHANIE LAGOS, in her official capacity as Member of the New Jersey Redistricting Commission, JEFF NASH, in his official capacity as Member of the New Jersey Redistricting Commission, DANA REDD, in her official capacity as Member of the New Jersey Redistricting Commission, and TAHESHA WAY, in her official capacity as New Jersey Secretary of State,

Defendants.

Plaintiffs, by way of Amended Complaint in Lieu of Prerogative Writs, hereby state as follows:

### **INTRODUCTION AND JURISDICTION**

1. This is an action challenging the establishment of Congressional districts by the New Jersey Redistricting Commission (“NJRC”), a body established pursuant to Article II, Section II of the New Jersey Constitution.

2. The Supreme Court of New Jersey possesses original jurisdiction over matters involving the NJRC, including the adoption of Congressional districts, pursuant to Article II, Section II, Paragraph 7 of the New Jersey Constitution.

3. On December 22, 2021, the NJRC held a meeting for the purpose of selecting one of the two maps proposed by the respective partisan delegations. The Independent Member began the meeting by reviewing the criteria he utilized to consider the proposals and proclaimed that both maps equally met the criteria – a claim the Republican delegation disputed based on its map more closely meeting and exceeding the Independent Member’s standards and general legal principles applicable to redistricting.

4. Despite the Independent Member’s statement that the maps were equally acceptable to him, the Independent Member inexplicably cast his vote upon the stated basis that the Republican Delegation’s Congressional Redistricting Map prevailed in the last round of redistricting one decade ago, requiring the Democratic Delegation’s Congressional Redistricting Map to prevail in this round of redistricting.

5. The Independent Member specifically stated: “In the end, I decided to vote for the Democratic map, simply because in the last redistricting map it was drawn by the Republicans. Thus, I conclude that fairness dictates that the Democrats have the opportunity to have their map used for this next redistricting cycle.”

6. This reasoning established that New Jersey’s congressional redistricting through 2032 – and all of its significant implications for federal representation – were reduced to a predetermined decision that a Democratic map must prevail because Republicans “won” last time.

7. This action by the Independent Member, and in turn the NJRC, undermines the constitutional structure of the NJRC and fails to satisfy any potential standard of judicial review held applicable under New Jersey law, including being arbitrary, capricious, and unreasonable.

8. This action by the Independent Member also presents violations of both federal and state constitutional equal protection and due process protections, under either strict scrutiny or rational basis review.

9. Recent news accounts have also revealed that the Independent Member’s spouse has received and given political campaign contributions that raise concerns about the Independent Member’s impartiality. Among other things, the Independent Member’s spouse gave a reportable campaign contribution in 2021 to Congresswoman Bonnie Watson Coleman, who is one of New

Jersey's current members of Congress, and whose political future is directly affected by the redistricting decisions of the NJRC.

10. This matter is justiciable, with the New Jersey Constitution specifically affording the Supreme Court of New Jersey with original jurisdiction over the establishment of Congressional districts and setting forth a procedure in the event a map is declared unlawful by this Court.

11. For these reasons, Plaintiffs seek judicial relief from this Court to a) vacate the Congressional districts established by the NJRC and to remand the matter to the NJRC for further proceedings, and b) render a judicial determination regarding the ability of Chair Wallace to continue in said capacity under the common law conflict of interest.

### **PARTIES**

12. Plaintiff Douglas Steinhardt is a member of the New Jersey Redistricting Commission and Delegation Chair for the Republican Party.

13. Plaintiff Michele Albano is a member of the New Jersey Redistricting Commission and a member of the Republican Party delegation.

14. Plaintiff Jeanne Ashmore is a member of the New Jersey Redistricting Commission and a member of the Republican Party delegation.

15. Plaintiff Mark Duffy is a member of the New Jersey Redistricting Commission and a member of the Republican Party delegation.

16. Plaintiff Mark LoGrippo is a member of the New Jersey Redistricting Commission and a member of the Republican Party delegation.

17. Plaintiff Lynda Pagliughi is a member of the New Jersey Redistricting Commission and a member of the Republican Party delegation.

18. Defendant New Jersey Redistricting Commission is a body established pursuant to Article II, Clause II of the New Jersey Constitution.

19. Defendant John E. Wallace, Jr. is the Independent Member of the New Jersey Redistricting Commission. Wallace was appointed to this position by the Supreme Court of New Jersey in accordance with Article II, Section II, Paragraph 1(c) of the New Jersey Constitution.

20. Defendant Janice Fuller is a member of the New Jersey Redistricting Commission and Delegation Chair for the Democratic Party. She is named solely in her official capacity and only to the extent that the members of the Democratic delegation may be indispensable parties to this action.

21. Defendant Iris Delgado is a member of the New Jersey Redistricting Commission and a member of the Democratic Party delegation. She is named solely in her official capacity and only to the extent that the members of the Democratic delegation may be indispensable parties to this action.

22. Defendant Vin Gopal is a member of the New Jersey Redistricting Commission and a member of the Democratic Party delegation. He is named solely in his official capacity and only to the extent that the members of the Democratic delegation may be indispensable parties to this action.

23. Defendant Stephanie Lagos is a member of the New Jersey Redistricting Commission and a member of the Democratic Party delegation. She is named solely in her official capacity and only to the extent that the members of the Democratic delegation may be indispensable parties to this action.

24. Defendant Jeff Nash is a member of the New Jersey Redistricting Commission and a member of the Democratic Party delegation. He is named solely in her official capacity and only

to the extent that the members of the Democratic delegation may be indispensable parties to this action.

25. Defendant Dana Redd is a member of the New Jersey Redistricting Commission and a member of the Democratic Party delegation. She is named solely in her official capacity and only to the extent that the members of the Democratic delegation may be indispensable parties to this action.

26. Defendant Tahesha Way is the New Jersey Secretary of State, who is responsible for overseeing elections in the State, including the implementation of the Congressional Districts certified to her by the NJRC.

### **ESTABLISHMENT OF NJRC**

27. Under the New Jersey Constitution, the NJRC is established and tasked with the establishment of Congressional districts every ten years for the forthcoming decade, comprising New Jersey's congressional redistricting process.

28. The NJRC is comprised of six appointees of the majority political party, six appointees of the minority political party, and one "Independent Member."

29. The New Jersey Constitution provides an opportunity for the twelve partisan members to select the thirteenth "Independent Member." In the event that the twelve partisan members are unable to select the Independent Member, the Supreme Court of New Jersey is tasked with selecting from two individuals that received the greatest number of votes to serve as the Independent Member.

30. The NJRC reached an impasse for the selection of an Independent Member between the Republican Delegation's support for the Hon. Marina Corodemus (ret.) and the Democratic Delegation's support for the Hon. John E. Wallace, Jr. (ret.).

31. The NJRC certified this impasse to the Supreme Court of New Jersey, and the Supreme Court of New Jersey resolved the impasse by certifying the Democratic Delegation's choice of the Hon. John E. Wallace, Jr (ret.) to serve as the Independent Member.

### **NJRC PROCESS**

32. The fully constituted thirteen-member NJRC held its first organizational meeting on September 1, 2021. At that meeting, John Wallace was officially recognized as the Chair of the delegation, and Douglas Steinhardt and Janice Fuller were recognized as the chairs of their respective partisan caucuses.

33. Following the organizational meeting, both partisan delegations spent significant time assembling their professional teams, which included attorneys, demographers, professional mapmakers, and other staff and technical assistance to provide them the information and tools to analyze the census data and help them craft a map. Both delegations and Chair Wallace were provided with and expended public money and resources towards the Congressional redistricting process.

34. Between October 23, 2021 and December 9, 2021, the NJRC held ten public hearings, around the state, in both virtual and in-person formats.

35. During that time, the NJRC heard public testimony on a myriad of issues that New Jersey citizens believed that the NJRC should consider when drawing Congressional districts and selecting a map.

36. Chair Wallace did not engage in any negotiations with the Republican or Democratic Delegations as part of any of these public hearings, nor did any negotiations or discussions take place in private during the time of the public hearings with either delegation, to the best of our knowledge.

37. Following the final public hearing, the partisan delegations met with Chair Wallace and his team of advisors over the course of December 17, 2021 to December 20, 2021, at a hotel in Cherry Hill.

38. During those discussions, Chair Wallace provided feedback to the Republican delegation (and presumably to the Democratic delegation as well), and the Republican delegation made changes to its proposed map based upon the comments from Chair Wallace.

39. At no time during the three-days of discussions did Chair Wallace meet with the two partisan delegations together, nor did the partisan delegations exchange maps.

40. At the conclusion of these meetings with Chair Wallace, at Chair Wallace's request, each delegation submitted a map to him. Chair Wallace provided no concerns or additional suggestions to the Republican delegation.

41. The NJRC still had nearly one month prior to the New Jersey Constitution's deadline of January 18, 2022 to hold further negotiations towards the establishment of Congressional districts, but no such negotiations took place.

#### **ADOPTION OF CONGRESSIONAL REDISTRICTING MAP**

42. Instead, at the request of Chair Wallace, on December 22, 2021 at 10:30 AM, the NJRC held a meeting at the State House Annex in Trenton, New Jersey. The meeting lasted only approximately 15 minutes.

43. A true copy of a transcript of this meeting is attached hereto as **Exhibit A** and incorporated by reference.

44. Chair Wallace opened the meeting by making his own remarks.

45. Chair Wallace discussed the standards that his "team" considered in reviewing maps that were provided to him by both the Republican Delegation and the Democratic Delegation.

46. Specifically, Chair Wallace indicated that he utilized the following factors:

a) Equal Population;

b) Compliance with the Voting Rights Act, Equal Protection Clause and Apportionment Clause, which should include “sufficient numbers of minority/majority districts, and provide the racial and language minorities with reasonable opportunity to participate in the political processes...”

c) Political subdivision boundaries and communities of interest shall be respected and “[m]apmakers should not split political subdivision boundaries and communities of interests unless necessary...”

d) “Competitive districts are favored...”

e) “No district may be formed solely to favor or disfavor any political party or the election of any person.”

f) Cores of Districts should remain intact were possible “[t]o assist voters in assessing incumbents and minimiz[e] voter confusion”

g) “All districts shall be as compact and regularly shaped as possible...”

47. Chair Wallace concluded that, “in summary, both delegations aptly applied our standards to their map.”

48. Thus, Chair Wallace acknowledged that he reached an impasse between selecting the maps provided by the Democratic delegation and Republican delegation, which were equally compliant with his standards.

49. However, a more diligent application of the factors to the two proposed maps would have exposed significant differences between the maps.

50. For instance, the Republican map, titled the “Voter Empowerment Map” by the delegation, ensures that every district contained at least 25% minority population, while the Democrats’ adopted map does not.

51. The Voter Empowerment Map contains less county splits than the Democrats’ adopted map, and only splits 26 voting districts, while the adopted map splits 79 voting districts.

52. The Voter Empowerment Map maintains Joint Base McGuire within one congressional district, while the Democrats' adopted map splits the community of interest for the first time since 1985.

53. The Voter Empowerment Map contains twice as many competitive districts as the Democrats' adopted map.

54. The Voter Empowerment Map is not drawn to favor any political party or person. Based on the analysis of Planscore.com, both proposed maps actually contain a bias towards Democratic candidates, however, the Democrats' adopted map is more skewed towards Democrats than 90% of historical plans. The Voter Empowerment Map also favors Democratic candidates, but is only 49% more skewed than historical plans. See **Exhibit B**.

55. The Voter Empowerment Map leaves 85% of the State's population in their current districts, while the Democrats' adopted map only leaves 80% of the State's population, relocating more than 460,000 more residents than the Voter Empowerment Map.

56. Finally, the Voter Empowerment Map is mathematically and visually more compact than the Democrats' adopted map.

57. Chair Wallace did not choose to take any actions to resolve the apparent impasse, such as delaying a vote on the map, pursuing further negotiations, or requesting more information from the partisan delegations regarding their respective proposals and the application of these factors to their maps. Given that the New Jersey Constitution does not require a map be selected until January 18, 2022, Chair Wallace was under no pressure to make a decision on December 22, 2021.

58. Instead, and inexplicably, Chair Wallace determined that he was going to vote for the Democratic Delegation's map, based upon the following reasoning: "In the end, I decided to

vote for the Democratic map, simply because in the last redistricting map, it was drawn by the Republicans. Thus, I conclude that fairness dictates that the Democrats have the opportunity to have their map used for the next redistricting cycle.”

59. Chair Wallace’s on-the-record explanation essentially held that an impasse between the Democratic and Republican delegations was required to be resolved in favor of the Democratic delegation.

60. If Chair Wallace found there to be an impasse between the Democratic Delegation’s map and the Republican Delegation’s map that he could not resolve, the New Jersey Constitution designates the Supreme Court of New Jersey to resolve the impasse and select between the two maps receiving the greatest number of votes.

61. If Chair Wallace had chosen that option, the Republican delegation (and Democratic Delegation) could have been provided an opportunity to present its map to the Supreme Court to argue why its map was preferable if Chair Wallace was unable to differentiate between the two maps.

62. Following Chair Wallace’s remarks, the NJRC adopted the Democratic delegation’s map on a party-line vote, with all Democratic Commissioners and Chair Wallace voting in favor, and all Republican Commissioners voting against.

63. The NJRC’s vote and establishment of Congressional district for the next decade was invalid because it was contingent upon the flawed vote and reasoning by Chair Wallace.

64. Chair Wallace’s actions lacked any reasonable basis and were inconsistent with the constitutional structure of the NJRC and role of the Independent Member.

65. These apparent legal infirmities can be remedied by this Court vacating the NJRC's establishment of Congressional districts and remanding the matter for further proceedings by the NJRC, as provided in the New Jersey Constitution.

66. The New Jersey Constitution authorizes this Court to judicially extend the January 18, 2022 deadline for the NJRC to certify a Congressional map in the event of a map being declared unlawful.

67. The filing deadline for Congressional candidates is not until April 5, 2022 under Title 19 of the New Jersey statutes.

68. Thus, this Complaint has been filed with ample time for this Court to order a remand and for the NJRC to engage in further proceedings to remedy the foregoing legal infirmities.

#### **COUNT I – ENTITLEMENT TO PREROGATIVE WRIT RELIEF**

69. Plaintiff repeats and realleges each of the foregoing allegations and makes the same a part hereof as if set forth at length

70. The New Jersey Constitution specifically vests the Supreme Court of New Jersey with sole and original jurisdiction over “any action” of the NJRC, “including the establishment of Congressional districts[] by the [NJRC]” pursuant to Article II, Section II, Paragraph 7 of the New Jersey Constitution.

71. The New Jersey Constitution also provides for action by this Court to invalidate an unlawful map adopted by the NJRC and remanding for further proceedings, with Article II, Section II, Paragraph 9 stating that in the event “a plan certified by the commission is declared unlawful,” the NJRC “shall reorganize and adopt another Congressional district plan in the same manner as herein required . . . .”

72. Thus, the actions of the NJRC are subject to judicial review under the New Jersey Constitution.

73. In contrast, the New Jersey Constitution provides that the Council on Local Mandates, pursuant to Article VIII, Section II, Clause 5 shall render “decisions” that are “political and not judicial determinations,” thus immunizing them from judicial review.

74. The New Jersey Constitution also generally affords the judiciary with the power of judicial review, with Article VI, Section V specifically providing that prerogative writs are superseded, and in lieu thereof, relief shall be heard by the Superior Court upon rules established by this Court.

75. The New Jersey common law and case law generally establish that governmental actions are subject to judicial review and may be set aside if arbitrary, capricious, and unreasonable.

76. Chair Wallace’s reasoning and actions fail to satisfy any modicum or standard of judicial review that may be held applicable to the NJRC under New Jersey law, including being arbitrary, capricious, and unreasonable.

77. The NJRC’s adoption of the Democratic map is justiciable under the New Jersey Constitution and must be set aside by this Court because its adoption was based upon an arbitrary, capricious, and unreasonable vote and reasoning by Chair Wallace.

**WHEREFORE**, Plaintiffs respectfully request that this Court:

A: Order that the NJRC’s establishment of Congressional districts on December 22, 2021 be vacated;

B: Order that the establishment of Congressional districts be remanded to the NJRC for further proceedings in accordance with the New Jersey Constitution;

C: Order that the Secretary of State be enjoined from taking any actions effectuating the Congressional districts approved by the NJRC on December 22, 2021; and

D: All such other relief that this Court deems appropriate and necessary.

**COUNT II – VIOLATIONS OF ARTICLE I, PARAGRAPH 1 OF NEW JERSEY  
CONSTITUTION**

78. Plaintiff repeats and realleges each of the foregoing allegations and makes the same a part hereof as if set forth at length.

79. Article I, Paragraph 1 of the New Jersey Constitution “has been interpreted as conferring the right to equal treatment under the law, a right analogous to the guarantee of equal protection under the Fourteenth Amendment to the New Jersey Constitution.” Doe v. Poritz, 142 N.J. 1, 94 (1995). “Although conceptually similar, the right under the State Constitution can in some situations be broader than the right conferred by the Equal Protection Clause.” Ibid.

80. This constitutional provision has also been interpreted as affording a due process right. See Greenberg v. Kimmelman, 99 N.J. 552, 563 (1985).

81. The NJRC’s adoption of a Congressional redistricting map that will classify and bind New Jersey voters for the next 10 years implicates the fundamental right of voting that is subject to equal protection and due process protections.

82. Chair Wallace’s reasoning and actions fail to satisfy any modicum or standard of judicial review that may be held applicable under the State Constitution’s equal protection and due process guarantees, including under either rational basis or strict scrutiny review.

**WHEREFORE**, Plaintiffs respectfully request that this Court:

A: Order that the NJRC’s establishment of Congressional districts on December 22, 2021, be vacated;

B: Order that the establishment of Congressional districts be remanded to the NJRC for further proceedings in accordance with the New Jersey Constitution;

C: Order that the Secretary of State be enjoined from taking any actions effectuating the Congressional districts approved by the NJRC on December 22, 2021; and

D: All such other relief that this Court deems appropriate and necessary.

**COUNT III – VIOLATIONS OF FOURTEENTH AMENDMENT TO THE UNITED STATES CONSTITUTION**

83. Plaintiff repeats and realleges each of the foregoing allegations and makes the same a part hereof as if set forth at length

84. The Fourteenth Amendment to the United States Constitution contains a procedural due process and equal protection right that is binding upon the States, and in turn, the NJRC.

85. Case law provides that issues involving the fundamental right of voting are subject to strict scrutiny review.

86. Case law provides that issues that do not involve such fundamental rights or suspect classifications are subject to rational basis review.

87. The NJRC's adoption of a Congressional redistricting map that will classify and bind New Jersey voters for the next 10 years implicates the fundamental right of voting that is subject to equal protection and due process protections.

88. Chair Wallace's reasoning and actions fail to satisfy any modicum or standard of judicial review that may be held applicable under the Federal Constitution's equal protection and due process guarantees, including either rational basis or strict scrutiny review.

**WHEREFORE**, Plaintiffs respectfully request that this Court:

A: Order that the NJRC's establishment of Congressional districts on December 22, 2021, be vacated;

B: Order that the establishment of Congressional districts be remanded to the NJRC for further proceedings in accordance with the New Jersey Constitution;

C: Order that the Secretary of State be enjoined from taking any actions effectuating the Congressional districts approved by the NJRC on December 22, 2021; and

D: All such other relief that this Court deems appropriate and necessary.

#### **COUNT IV – COMMON LAW CONFLICT OF INTEREST**

89. Plaintiff repeats and realleges each of the foregoing allegations and makes the same a part hereof as if set forth at length.

90. The New Jersey Constitution intends for the NJRC's Independent Member to be independent from politics by specifically banning the Independent Member from holding party or political office within the preceding five-year period.

91. This Court has held that there is a common law conflict of interest that is applicable to governmental tribunals. Wyzykowski v. Rizas, 132 N.J. 509, 523 (1993). Thus, this common law conflict of interest extends to the Independent Member.

92. The common law conflict of interest prevents a public official from participating in a matter in which he or she possesses a “conflicting interest that may interfere with the impartial performance of his duties as a member of the public body.” Ibid.

93. The common law conflict of interest is administered by the standard of “whether the circumstances could reasonably be interpreted to show that they had the likely capacity to tempt the official to depart from his sworn public duty.” Ibid.

94. The common law conflict of interest extends to indirect pecuniary interests, where a public official votes on matters that do not financially benefit that individual, but rather, that individual's family member. Ibid.

95. The common law conflict of interest also extends to direct personal interests, where a public official votes on a matter in a non-financial way, but on a matter of great importance, for instance benefitting a blood-relative or close friend. Ibid.

96. Given the unique role of the Independent Member under the New Jersey Constitution, being tasked with the impartial selection of maps presented by the Democratic Delegation and Republican Delegation – akin to a judge – the common law conflict of interest applicable to the Independent Member should also be informed by the Canons of Judicial Conduct.

97. Code of Judicial Conduct Canon 3 states that “A judge should perform the duties of judicial office impartially and diligently.” Subsection C(1) provides that “[a] judge should disqualify himself . . . in a proceeding in which the judge’s impartiality might reasonably be questioned, including but not limited to instances where . . . (c) the judge knows that . . . the judge’s spouse . . . has a financial interest in the subject matter in controversy . . . or any other interest that could be affected by the outcome of the proceeding; [or] (d) the . . . judge’s spouse . . . (iii) is known by the judge to have an interest that could be affected by the outcome of the proceeding.

98. A recent news account has revealed that Chair Wallace’s spouse gave a reportable campaign contribution to Representative Bonnie Watson Coleman, one of only twelve the current members of New Jersey’s congressional delegation. A true copy of this news account is attached as **Exhibit C**.

99. As reflected in the news account, within the last year, on March 22, 2021, Mrs. Wallace made a \$250 campaign contribution to Bonnie Watson Coleman for Congress, the campaign account for Congresswoman Watson Coleman’s re-election to the United States House of Representatives. A true copy of the corresponding FEC report is attached as **Exhibit D**.

100. Chair Wallace and the NJRC have jurisdiction over the map that will be applicable to Congresswoman Watson Coleman's re-election this year.

101. This political contribution by Mrs. Wallace creates a common law conflict of interest as to Mr. Wallace's participation in the NJRC's affairs as the Independent Member, which by design is constitutionally required to be immune from politics.

102. Pursuant to these principles, Chair Wallace should have been and should be required to recuse himself from the NJRC's proceedings given his spouse's recent donation to the re-election of New Jersey Congresswoman Bonnie Watson Coleman, whose candidacy is directly impacted by the redistricting map selected by the NJRC.

103. This conflict of interest becomes even more apparent when coupled with the Independent Member's proffered rationale for adopting the Democratic map that is placed under review in this action – specifically that he “decided to vote for the Democratic map, simply because in the last redistricting map it was drawn by the Republicans.”

104. This Court is afforded with the power of judicial review and the ability to administer and interpret the common law conflict of interest. The public's trust in the NJRC's process prescribed by the New Jersey Constitution requires a finding that the foregoing campaign contributions render Chair Wallace ineligible to serve as the “Independent Member” under the common law.

105. This Court must vacate the NJRC's establishment of Congressional districts that was approved on December 22, 2021, based upon the pivotal vote of a conflicted Chair Wallace.

106. This Court must order that Chair Wallace be disqualified from further proceedings due to his conflict of interest.

107. The NJRC may continue to operate in the absence of an Independent Member that is eligible to vote.

108. In the event that the Democratic Delegation and Republican Delegation are unable to negotiate the establishment of Congressional districts within a time period prescribed by this Court, the New Jersey Constitution sets forth a process in which the two maps receiving the greatest number of votes are forwarded to this Court for a determination.

109. Thus, the New Jersey Constitution provides a clear process for the establishment of Congressional districts that can be followed without an eligible Independent Member of the NJRC.

**WHEREFORE**, Plaintiffs respectfully request that this Court:

A: Order that the NJRC's establishment of Congressional districts on December 22, 2021, be vacated;

B: Order that the establishment of Congressional districts be remanded to the NJRC for further proceedings in accordance with the New Jersey Constitution;

C: Order that the Secretary of State be enjoined from taking any actions effectuating the Congressional districts approved by the NJRC on December 22, 2021;

D: Order that Chair Wallace be disqualified from participating in further proceedings of the NJRC due to a common law conflict of interest; and

E: All such other relief that this Court deems appropriate and necessary.

**DESIGNATION OF TRIAL COUNSEL**

Matthew C. Moench, Esq. is hereby designated as trial counsel in this matter.

**CERTIFICATION PURSUANT TO R. 4:5-1**

I certify that the matter in controversy is not the subject of any other action pending in any court or a pending arbitration proceeding, and no such action is contemplated. I know of no other

parties that should be made part of this lawsuit. I recognize my continuing obligation to file and serve on all parties and the Court any amended certification, if there is a change in the facts stated in the original certification.

KING, MOENCH, HIRNIAK & COLLINS, LLP  
Attorneys for Plaintiffs

Dated: January 5, 2022

By: /s/ Matthew C. Moench  
MATTHEW C. MOENCH

**RULE 1:38-7(b) CERTIFICATION**

I hereby certify that all confidential identifiers have been redacted from any documents now submitted to the Court, and will be redacted from all documents submitted in the future in accord with R. 1:38-7(b).

KING, MOENCH, HIRNIAK & COLLINS, LLP  
Attorneys for Plaintiffs

Dated: January 5, 2022

By: s/Matthew C. Moench  
MATTHEW C. MOENCH

# EXHIBIT A

**In The Matter Of:**  
*In Re: NJ Redistricting Commission Hearing*

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*Transcript Of Proceedings*  
*December 22, 2021*

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*Min-U-Script® with Word Index*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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 IN THE MATTER OF: : STENOGRAPHIC  
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 NJ REDISTRICTING :  
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 COMMISSION HEARING :  
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Wednesday, December 22, 2021  
 Commencing at 10:30 a.m.  
 Videoconference

C O M M I S S I O N M E M B E R S:

HON. JOHN E. WALLACE, JR., Chairperson  
 JANICE FULLER, Delegation Chair  
 DOUG STEINHARDT, Delegation Chair

COMMISSIONERS:

IRIS DELGADO  
 MICHELE ALBANO  
 VIN GOPAL  
 JEANNE ASHMORE  
 STEPHANIE LAGOS  
 MARK DUFFY  
 JEFF NASH  
 MARK LOGRIPPO  
 DANA REDD  
 LYNDIA PAGLIUGHI

RAYSA MARTINEZ KRUGER, Secretary

T R A N S C R I P T of the stenographic  
 notes of RENEE RUSSO, CCR, CRCR, RPR, CRR, a  
 Certified Court Reporter and Notary Public of the  
 State of New Jersey, Certificate No. XI00143700.

1 (Audio begins.)

2 CHAIRPERSON HON. WALLACE: I welcome  
3 you and I'm sorry to get started a little bit  
4 late, but I think we -- at least I had little  
5 problems getting from the garage to this room.

6 In any event, the meeting is hereby  
7 called to order and I ask the secretary to please  
8 take the role.

9 SECRETARY KRUGER: Commissioner  
10 Redd.

11 COMMISSIONER REDD: Present.

12 SECRETARY KRUGER: Commissioner  
13 Pagliughi.

14 COMMISSIONER PAGLIUGHI: Present.

15 SECRETARY KRUGER: Commissioner  
16 Nash.

17 COMMISSIONER NASH: Here.

18 SECRETARY KRUGER: Commissioner  
19 LoGrippo.

20 COMMISSIONER LoGRIPPO: Here.

21 SECRETARY KRUGER: Commissioner  
22 Lagos.

23 COMMISSIONER LAGOS: Present.

24 SECRETARY KRUGER: Commissioner  
25 Gopal.

1 COMMISSIONER GOPAL: Here.

2 SECRETARY KRUGER: Commissioner

3 Duffy.

4 COMMISSIONER DUFFY: Here.

5 SECRETARY KRUGER: Commissioner

6 Delgado.

7 COMMISSIONER DELGADO: Present.

8 SECRETARY KRUGER: Commissioner

9 Ashmore.

10 COMMISSIONER ASHMORE: Here.

11 SECRETARY KRUGER: Commissioner

12 Albano.

13 COMMISSIONER ALBANO: Here.

14 SECRETARY KRUGER: Republican chair

15 Steinhardt.

16 DELEGATION CHAIR STEINHARDT: Here.

17 SECRETARY KRUGER: Democratic chair

18 Fuller.

19 DELEGATION CHAIR FULLER: Here.

20 SECRETARY KRUGER: Chair Wallace.

21 CHAIRPERSON HON. WALLACE: Here.

22 Thank you.

23 And good morning again. I am

24 prepared this morning --

25 (Audio stops and starts.)

1 I would remind everyone that's on the  
2 call to please mute your phones. Thank you very  
3 much.

4 We'll try it again. As I was about  
5 to say that I am prepared this morning to make a  
6 very difficult decision. I say "difficult"  
7 because both delegations have presented me with a  
8 map that substantially satisfies the standards  
9 proposed at the outset. I will list those  
10 standards shortly.

11 To be sure, the citizens of New  
12 Jersey have aided the commission greatly in the  
13 process of formulating the two maps. The  
14 commission held 10 hearings, between in person  
15 and Zoom hearings, where almost 200 people  
16 testified, while others submitted written  
17 testimony and some even submitted proposed maps.

18 Following the public hearings, the  
19 two delegations, considering the evidence,  
20 submitted by the public began the process of  
21 preparing their map.

22 I am fortunate to have had Judge  
23 LeFelt as my special counsel and together we  
24 prepared and suggested standards that each  
25 delegation should consider in the map-making

1 process. Here are the congressional  
2 redistricting standards we proposed:

3 1) Mapmakers shall establish 12  
4 congressional districts that shall be  
5 geographically contiguous and counting the total  
6 population for each district to be formed.

7 (Interruption in the proceedings.)

8 CHAIRPERSON HON. WALLACE: And that  
9 is Judge LeFelt.

10 In counting the total population for  
11 each district to be formed, incarcerated  
12 prisoners should be counted at their prior  
13 addresses. Districts must be as equal in  
14 population as possible to the ideal district  
15 population of 773,585.

16 2) Mapmakers shall comply with the  
17 Voting Rights Act, and all relevant Supreme Court  
18 decisions apply in the Equal Protection clause  
19 and the Apportionment clause. The map should  
20 include sufficient numbers of minority/majority  
21 districts, and provide the racial and language  
22 minorities with reasonable opportunity to  
23 participate in the political processes, and elect  
24 representatives at of their choice whether alone  
25 or in coalition with others.

1                   Furthermore, any consideration of  
2 race shall only be as necessary to avoid a  
3 violation of the Voting Rights Act and shall be  
4 narrowly tailored to satisfy the Act's  
5 requirements.

6                   3) Political subdivision boundaries  
7 and communities of interest; that is, cultural,  
8 ethnic, linguistic, economic and religious shall  
9 be respected. Mapmakers shall not split  
10 political subdivision boundaries and communities  
11 of interest unless necessary to achieve  
12 compliance with standards 1 or 2.

13                   4) Competitive districts are favored  
14 so long as compliance with standards 1, 2 or 4 --  
15 or 3, that is, would not be significantly  
16 hindered or impaired.

17                   5) No district may be formed solely  
18 to favor or disfavor any political party or the  
19 election of any person.

20                   6) To assist voters in assessing  
21 incumbents and minimizing voter confusion,  
22 districts may include the cores of existing  
23 districts, provided the new district to be formed  
24 will substantially comply with all of the  
25 preceding standards.

1                   7) All districts shall be as compact  
2 and regularly shaped as possible unless deviation  
3 is required to comply with any of the above  
4 standards.

5                   Each delegation engaged outstanding  
6 map experts. It was my privilege to work with  
7 them during this process. In addition to Judge  
8 LeFelt's expert guidance, I have been greatly  
9 assisted by the Electoral Innovation Lab at  
10 Princeton University throughout.

11                   Turning to this commission, the  
12 chairs and their delegations are outstanding, and  
13 clearly represented the interests of New Jersey  
14 and their respective parties. Each member has  
15 been extremely considerate throughout the process  
16 and responded positively to the many comments my  
17 team proposed in an effort to make a good map  
18 even better.

19                   The delegation spent four consecutive  
20 days and evenings meeting with my team in an  
21 effort to improve the respective map and to  
22 convince me that their map was the better of the  
23 two. You can imagine the process was not easy.

24                   For example, in order to meet the  
25 constitutional requirement of one person one

1 vote, each time we proposed a new configuration,  
2 it caused other changes in the district or other  
3 districts that were not always contemplated.  
4 Nevertheless, in my view, the process produced  
5 two constitutional maps.

6 In brief, both maps comply with the  
7 Federal Equal Population mandate; each has 12  
8 districts with substantially equal population.  
9 Both maps satisfy the Voting Rights Act in that  
10 each proposal contains five majority/minority  
11 districts.

12 (Interruption in the proceedings.)

13 CHAIRPERSON HON. WALLACE: Both maps  
14 satisfy the Voting Rights Act in that each  
15 proposal contains five majority/minority  
16 districts, I repeat.

17 Both maps consider race only to the  
18 extent necessary to avoid a violation of the  
19 Voting Rights Act, and those considerations were  
20 narrowly tailored to satisfy the Act's  
21 requirements.

22 Similarly, both maps were close to  
23 one another in county and town splits and  
24 considered communities of interest in each  
25 district. Competitiveness, preservation of

1 district cores and compactness were also  
2 satisfied in both maps.

3 The only area where one map pulled  
4 ahead of the other is in partisan fairness; that  
5 is, no district may be formed solely to be -- to  
6 favor or disfavor any political party or the  
7 election of any person.

8 Both maps were evaluated by my team  
9 using various statewide tests for partisan  
10 fairness. Without getting into the details of  
11 the tests, I simply state that the results showed  
12 that the partisan fairness would favor the  
13 democratic's map. However, because neither  
14 delegation used these tests, I have decided not  
15 to give any weight to them in making my decision.

16 In summary, both delegations aptly  
17 applied our standards to their map. In the end,  
18 I decided to vote for the democratic map, simply  
19 because in the last redistricting map it was  
20 drawn by the republicans.

21 Thus, I conclude that fairness  
22 dictates that the democrats have the opportunity  
23 to have their map used for this next  
24 redistricting cycle. Thank you. That concludes  
25 my comments.

1 I open the floor to any chairs wish  
2 to make a comment. Chair Fuller.

3 DELEGATION CHAIR FULLER: Thank you,  
4 Chairman Wallace.

5 Good morning, everyone, here with us  
6 today and watching us from home. It's a  
7 privilege to be with you all here today at the  
8 Statehouse for this incredibly important meeting  
9 that carries tremendous significance for the  
10 future of our state and the nation.

11 First and foremost, let me take --  
12 let me thank Justice Wallace -- Chairman Wallace  
13 for his service to the commission. Your  
14 leadership has sought us a fair and collegial  
15 process that we can all -- we were all honored to  
16 have been a part of, and we thank you for your  
17 service.

18 I want to thank my fellow  
19 commissioners, my democratic colleagues, and the  
20 republican delegation, particularly Chairman  
21 Steinhardt, who have all given their time and  
22 their effort and their focus on the citizens of  
23 the state of New Jersey.

24 I would like to take a moment to  
25 thank those who helped us develop this map. Our

1 staff led by our executive director Sarah Jones,  
2 our legal team led by Raj Parikh, and our  
3 mapmaker Tom Bonier.

4 From the outset, the democratic  
5 commissioners had a primary goal to put forth and  
6 develop a fair and representative map that  
7 embraces the diversity of our state, not just for  
8 the next election but for the next decade. We  
9 wanted an open and transparent process, but  
10 allowed for robust participation. And we're  
11 proud to have convened more public hearings than  
12 ever before with nearly 200 witnesses testifying.

13 We put forth a map for consideration,  
14 which we will be voting on today, that we believe  
15 is responsive to the voices of the public and  
16 also the principles set forth by Chairman  
17 Wallace. We have limited arbitrary splits in  
18 towns and counties to ensure that citizens select  
19 the representatives and not the other way around.  
20 In fact, nine counties have no municipal splits  
21 at all and only 14 of our state's 565  
22 municipalities are split.

23 The map maintains core competitive  
24 districts and does not gerrymander to favor one  
25 political party. We maintain all of the existing

1 majority/minority districts and have ensured a  
2 decade of real and meaningful representation by  
3 minority voters.

4 In a state where people of color  
5 represent more than 48 percent of the population,  
6 we believed it is our responsibility to fight for  
7 the right of minority voters to choose a  
8 representation and to increase opportunities for  
9 minority representation.

10 In the wake of the Supreme Court  
11 striking down parts of the Voting Rights Act, our  
12 democratic commissioners understood that our map  
13 must show leadership on the issue of racial  
14 justice and be a map that represents all of New  
15 Jersey not just the privileged.

16 We increased African American  
17 population of district 10 maintaining a majority  
18 African American district.

19 The map increases Asian American  
20 influence reflecting our state's fastest growing  
21 population and ensuring that the people of AAPI  
22 descent will have an opportunity to participate  
23 robustly in our democracy.

24 We preserved the Latino influence of  
25 district eight, not diluting an important and

1 growing voice in our communities. These are just  
2 some of the highlights of the map before you  
3 today.

4 We believe the map achieves our  
5 primary goal of creating a fair and  
6 representative map and embraces the robust  
7 political public participation we have heard over  
8 the course of the past months.

9 On behalf of the most diverse  
10 partisan delegation in history, and as the first  
11 female chair, I again thank Chairman Wallace for  
12 his service, and thank you for the opportunity to  
13 offer these remarks.

14 CHAIRPERSON HON. WALLACE: I thank  
15 you for your comments, Chair Fuller.

16 Chair Steinhardt.

17 DELEGATION CHAIR STEINHARDT: Thank  
18 you so much. Thank you very much.

19 Chairman, thank you.

20 Grateful for the opportunity, of  
21 course, to participate in this process. Grateful  
22 to Chairwoman Fuller for her professionalism and  
23 those of my democratic counterparts for their  
24 service. They were all a pleasure to deal with.

25 Grateful especially to my republican

1 colleagues, Michele Albano, Jeanne Ashmore, Lynda  
2 Pagliughi, Mark Duffy and Mark LoGrippo for their  
3 time and service, held each of you in the highest  
4 regard, and your time and energy have earned the  
5 respect of your colleagues and your state.

6 Our map was designed to empower New  
7 Jersey voters. The final map, we feel, is just  
8 the antithesis of that. Our map provided voters  
9 including minority voters with meaningful  
10 opportunities to impact elections and met or  
11 exceeded every standard.

12 We were provided with five  
13 majority/minority districts and nine districts of  
14 the minority voting age population above 30  
15 percent. The distribution of minority population  
16 among all districts accurately reflected the  
17 state's diverse nature.

18 After consideration the testimony  
19 from 11 public hearings and a full adoption and  
20 agreement with Special Counsel LeFelt's  
21 philosophy that towns and counties are a strong  
22 measure of communities of interest, we believe we  
23 improved the current map.

24 Our map left nearly 85 percent of the  
25 state's voters in their current districts

1 avoiding unnecessary voter confusion, and  
2 maintained five districts that gave voters the  
3 opportunity to meaningfully impact general  
4 election outcomes and elect a candidate from  
5 either party.

6 To be candid, we're disappointed in  
7 the final result. We're disappointed in a  
8 process that disenfranchises most of the state's  
9 voting population. We're equally disappointed in  
10 a process that purported to promote equity,  
11 fairness and competition, but in the end eschewed  
12 those virtues.

13 We went to the 13th member with a map  
14 that we believe empowered the greatest number of  
15 New Jersey voters, and our caucus will vote today  
16 in that spirit and that spirit alone.

17 CHAIRPERSON HON. WALLACE: Thank  
18 you, Stan -- chair -- Chair Steinhardt.

19 Any other Commissioner members wish  
20 to make a comment?

21 Hearing none, do I have a motion on  
22 the, on the floor?

23 DELEGATION CHAIR FULLER: Justice  
24 Wallace, I move to adopt the map presented by the  
25 democratic commissioners.

1 CHAIRPERSON HON. WALLACE: Is there  
2 a second?

3 COMMISSIONER REDD: And, Justice  
4 Wallace, I wish to second that motion.

5 CHAIRPERSON HON. WALLACE: All  
6 right. It's moved and second. Please call the  
7 role.

8 SECRETARY KRUGER: Commissioner  
9 Redd.

10 COMMISSIONER REDD: Yes.

11 SECRETARY KRUGER: Commissioner  
12 Pagliughi.

13 COMMISSIONER PAGLIUGHI: No.

14 SECRETARY KRUGER: Commissioner  
15 Nash.

16 COMMISSIONER NASH: Yes.

17 SECRETARY KRUGER: Commissioner  
18 LoGripippo.

19 COMMISSIONER LOGRIPPO: No.

20 SECRETARY KRUGER: Commissioner  
21 Lagos.

22 COMMISSIONER LAGOS: Yes.

23 SECRETARY KRUGER: Commissioner  
24 Gopal.

25 COMMISSIONER GOPAL: Yes.

1 SECRETARY KRUGER: Commissioner

2 Duffy.

3 COMMISSIONER DUFFY: No.

4 SECRETARY KRUGER: Commissioner

5 Delgado.

6 COMMISSIONER DELGADO: Yes.

7 SECRETARY KRUGER: Commissioner

8 Ashmore.

9 COMMISSIONER ASHMORE: No.

10 SECRETARY KRUGER: Commissioner

11 Albano.

12 COMMISSIONER ALBANO: No.

13 SECRETARY KRUGER: Republican chair

14 Steinhardt.

15 DELEGATION CHAIR STEINHARDT: No.

16 SECRETARY KRUGER: Democratic chair

17 Fuller.

18 DELEGATION CHAIR FULLER: Yes.

19 SECRETARY KRUGER: Chair Wallace.

20 CHAIRPERSON HON. WALLACE: Yes.

21 The motion carries. The democratic  
22 map is adopted for the next redistricting cycle.

23 Any other business to come before the  
24 commission today?

25 Hearing none, do I hear a motion to

1 adjourn?

2 DELEGATION CHAIR STEINHARDT: So  
3 moved.

4 CHAIRPERSON HON. WALLACE: It's been  
5 moved. A second?

6 DELEGATION CHAIR FULLER: Second.

7 CHAIRPERSON HON. WALLACE: All in  
8 favor of adjournment say Aye.

9 (All members stated "Aye.")

10 CHAIRPERSON HON. WALLACE: Thank you  
11 very much again. Thank you, everyone. Please be  
12 safe. Have a very happy holiday and look forward  
13 to seeing you in, on other occasions.

14 (Audio ends.)

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C E R T I F I C A T E

I CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken by and before me stenographically at the time and place aforementioned.

I FURTHER CERTIFY that I am neither attorney for nor counsel to any of the parties; parties of any of the attorneys in this action; and that I am not financially interested in the outcome of this case.

*Renee Russo, CCR*

RENEE RUSSO, CCR, CRCR, RPR, CRR

CCR Certificate No. XI01437

CRCR Certificate No. 0106

	<p><b>9:17</b>  <b>apply (1)</b>                      5:18</p>	<p><b>7:23;10:15</b>  <b>candid (1)</b>                      15:6</p>	<p><b>10,12</b>  <b>commissioners (4)</b>                      10:19;11:5;12:12;                      15:25</p>	<p><b>counted (1)</b>                      5:12</p>
<p><b>A</b></p>	<p><b>Apportionment (1)</b>                      5:19</p>	<p><b>candidate (1)</b>                      15:4</p>	<p><b>communities (5)</b>                      6:7,10;8:24;13:1;                      14:22</p>	<p><b>counterparts (1)</b>                      13:23</p>
<p><b>AAPI (1)</b>                      12:21</p>	<p><b>aptly (1)</b>                      9:16</p>	<p><b>carries (2)</b>                      10:9;17:21</p>	<p><b>compact (1)</b>                      7:1</p>	<p><b>counties (3)</b>                      11:18,20;14:21</p>
<p><b>above (2)</b>                      7:3;14:14</p>	<p><b>arbitrary (1)</b>                      11:17</p>	<p><b>caucus (1)</b>                      15:15</p>	<p><b>compactness (1)</b>                      9:1</p>	<p><b>counting (2)</b>                      5:5,10</p>
<p><b>accurately (1)</b>                      14:16</p>	<p><b>area (1)</b>                      9:3</p>	<p><b>caused (1)</b>                      8:2</p>	<p><b>competition (1)</b>                      15:11</p>	<p><b>county (1)</b>                      8:23</p>
<p><b>achieve (1)</b>                      6:11</p>	<p><b>around (1)</b>                      11:19</p>	<p><b>chair (21)</b>                      3:14,16,17,19,20;                      10:2,3;13:11,15,16,                      17;15:18,18,23;17:13,                      15,16,18,19;18:2,6</p>	<p><b>Competitive (2)</b>                      6:13;11:23</p>	<p><b>course (2)</b>                      13:8,21</p>
<p><b>achieves (1)</b>                      13:4</p>	<p><b>Ashmore (5)</b>                      3:9,10;14:1;17:8,9</p>	<p><b>Chairman (6)</b>                      10:4,12,20;11:16;                      13:11,19</p>	<p><b>Competitiveness (1)</b>                      8:25</p>	<p><b>Court (2)</b>                      5:17;12:10</p>
<p><b>Act (6)</b>                      5:17;6:3;8:9,14,19;                      12:11</p>	<p><b>assessing (1)</b>                      6:20</p>	<p><b>CHAIRPERSON (12)</b>                      2:2,3;21;5:8;8:13;                      13:14;15:17;16:1,5;                      17:20;18:4,7,10</p>	<p><b>comply (4)</b>                      5:16;6:24;7:3;8:6</p>	<p><b>creating (1)</b>                      13:5</p>
<p><b>Act's (2)</b>                      6:4;8:20</p>	<p><b>assist (1)</b>                      6:20</p>	<p><b>chairs (2)</b>                      7:12;10:1</p>	<p><b>conclude (1)</b>                      9:21</p>	<p><b>cultural (1)</b>                      6:7</p>
<p><b>addition (1)</b>                      7:7</p>	<p><b>assisted (1)</b>                      7:9</p>	<p><b>Chairwoman (1)</b>                      13:22</p>	<p><b>concludes (1)</b>                      9:24</p>	<p><b>current (2)</b>                      14:23,25</p>
<p><b>addresses (1)</b>                      5:13</p>	<p><b>Audio (3)</b>                      2:1;3:25;18:14</p>	<p><b>changes (1)</b>                      8:2</p>	<p><b>configuration (1)</b>                      8:1</p>	<p><b>cycle (2)</b>                      9:24;17:22</p>
<p><b>adjourn (1)</b>                      18:1</p>	<p><b>avoid (2)</b>                      6:2;8:18</p>	<p><b>choice (1)</b>                      5:24</p>	<p><b>confusion (2)</b>                      6:21;15:1</p>	<p><b>days (1)</b>                      7:20</p>
<p><b>adjournment (1)</b>                      18:8</p>	<p><b>avoiding (1)</b>                      15:1</p>	<p><b>choose (1)</b>                      12:7</p>	<p><b>congressional (2)</b>                      5:1,4</p>	<p><b>deal (1)</b>                      13:24</p>
<p><b>adopt (1)</b>                      15:24</p>	<p><b>Aye (2)</b>                      18:8,9</p>	<p><b>choice (1)</b>                      12:7</p>	<p><b>consecutive (1)</b>                      7:19</p>	<p><b>decade (2)</b>                      11:8;12:2</p>
<p><b>adopted (1)</b>                      17:22</p>	<p><b>B</b></p>	<p><b>citizens (3)</b>                      4:11;10:22;11:18</p>	<p><b>consider (2)</b>                      4:25;8:17</p>	<p><b>decided (2)</b>                      9:14,18</p>
<p><b>adoption (1)</b>                      14:19</p>	<p><b>began (1)</b>                      4:20</p>	<p><b>clause (2)</b>                      5:18,19</p>	<p><b>considerate (1)</b>                      7:15</p>	<p><b>decision (2)</b>                      4:6;9:15</p>
<p><b>African (2)</b>                      12:16,18</p>	<p><b>begins (1)</b>                      2:1</p>	<p><b>clearly (1)</b>                      7:13</p>	<p><b>consideration (3)</b>                      6:1;11:13;14:18</p>	<p><b>decisions (1)</b>                      5:18</p>
<p><b>again (4)</b>                      3:23;4:4;13:11;                      18:11</p>	<p><b>behalf (1)</b>                      13:9</p>	<p><b>close (1)</b>                      8:22</p>	<p><b>considerations (1)</b>                      8:19</p>	<p><b>DELEGATION (15)</b>                      3:16,19;4:25;7:5,                      19;9:14;10:3,20;                      13:10,17;15:23;                      17:15,18;18:2,6</p>
<p><b>age (1)</b>                      14:14</p>	<p><b>better (2)</b>                      7:18,22</p>	<p><b>coalition (1)</b>                      5:25</p>	<p><b>considered (1)</b>                      8:24</p>	<p><b>delegations (4)</b>                      4:7,19;7:12;9:16</p>
<p><b>agreement (1)</b>                      14:20</p>	<p><b>bit (1)</b>                      2:3</p>	<p><b>colleagues (3)</b>                      10:19;14:1,5</p>	<p><b>considering (1)</b>                      4:19</p>	<p><b>Delgado (4)</b>                      3:6,7;17:5,6</p>
<p><b>ahead (1)</b>                      9:4</p>	<p><b>Bonier (1)</b>                      11:3</p>	<p><b>collegial (1)</b>                      10:14</p>	<p><b>constitutional (2)</b>                      7:25;8:5</p>	<p><b>democracy (1)</b>                      12:23</p>
<p><b>aided (1)</b>                      4:12</p>	<p><b>both (9)</b>                      4:7;8:6,9,13,17,22;                      9:2,8,16</p>	<p><b>color (1)</b>                      12:4</p>	<p><b>contains (2)</b>                      8:10,15</p>	<p><b>Democratic (9)</b>                      3:17;9:18;10:19;                      11:4;12:12;13:23;                      15:25;17:16,21</p>
<p><b>Albano (5)</b>                      3:12,13;14:1;17:11,                      12</p>	<p><b>boundaries (2)</b>                      6:6,10</p>	<p><b>comment (2)</b>                      10:2;15:20</p>	<p><b>contemplated (1)</b>                      8:3</p>	<p><b>democratic's (1)</b>                      9:13</p>
<p><b>allowed (1)</b>                      11:10</p>	<p><b>brief (1)</b>                      8:6</p>	<p><b>comments (3)</b>                      7:16;9:25;13:15</p>	<p><b>contiguous (1)</b>                      5:5</p>	<p><b>democrats (1)</b>                      9:22</p>
<p><b>almost (1)</b>                      4:15</p>	<p><b>business (1)</b>                      17:23</p>	<p><b>commission (5)</b>                      4:12,14;7:11;10:13;                      17:24</p>	<p><b>convened (1)</b>                      11:11</p>	<p><b>descent (1)</b>                      12:22</p>
<p><b>alone (2)</b>                      5:24;15:16</p>	<p><b>C</b></p>	<p><b>Commissioner (42)</b>                      2:9,11,12,14,15,17,                      18,20,21,23,24;3:1,2,                      4,5,7,8,10,11,13;                      15:19;16:3,8,10,11,                      13,14,16,17,19,20,22,                      23,25;17:1,3,4,6,7,9,</p>	<p><b>convince (1)</b>                      7:22</p>	<p><b>designed (1)</b>                      14:6</p>
<p><b>always (1)</b>                      8:3</p>	<p><b>call (2)</b>                      4:2;16:6</p>	<p><b>color (1)</b>                      12:4</p>	<p><b>convicted (1)</b>                      8:3</p>	<p><b>details (1)</b>                      9:10</p>
<p><b>American (3)</b>                      12:16,18,19</p>	<p><b>called (1)</b>                      2:7</p>	<p><b>comment (2)</b>                      10:2;15:20</p>	<p><b>convince (1)</b>                      7:22</p>	<p><b>develop (2)</b></p>
<p><b>among (1)</b>                      14:16</p>	<p><b>can (2)</b></p>	<p><b>comment (2)</b>                      10:2;15:20</p>	<p><b>core (1)</b>                      11:23</p>	
<p><b>antithesis (1)</b>                      14:8</p>		<p><b>comments (3)</b>                      7:16;9:25;13:15</p>	<p><b>cores (2)</b>                      6:22;9:1</p>	
<p><b>applied (1)</b></p>		<p><b>commission (5)</b>                      4:12,14;7:11;10:13;                      17:24</p>	<p><b>counsel (2)</b>                      4:23;14:20</p>	

<p>10:25;11:6  <b>deviation (1)</b>                  7:2  <b>dictates (1)</b>                  9:22  <b>difficult (2)</b>                  4:6,6  <b>diluting (1)</b>                  12:25  <b>director (1)</b>                  11:1  <b>disappointed (3)</b>                  15:6,7,9  <b>disenfranchises (1)</b>                  15:8  <b>disfavor (2)</b>                  6:18;9:6  <b>distribution (1)</b>                  14:15  <b>district (12)</b>                  5:6,11,14;6:17,23;                  8:2,25;9:1,5;12:17,18,                  25  <b>districts (18)</b>                  5:4,13,21;6:13,22,                  23;7:1;8:3,8,11,16;                  11:24;12:1;14:13,13,                  16,25;15:2  <b>diverse (2)</b>                  13:9;14:17  <b>diversity (1)</b>                  11:7  <b>down (1)</b>                  12:11  <b>drawn (1)</b>                  9:20  <b>Duffy (5)</b>                  3:3,4;14:2;17:2,3  <b>during (1)</b>                  7:7</p>	<p><b>embraces (2)</b>                  11:7;13:6  <b>empower (1)</b>                  14:6  <b>empowered (1)</b>                  15:14  <b>end (2)</b>                  9:17;15:11  <b>ends (1)</b>                  18:14  <b>energy (1)</b>                  14:4  <b>engaged (1)</b>                  7:5  <b>ensure (1)</b>                  11:18  <b>ensured (1)</b>                  12:1  <b>ensuring (1)</b>                  12:21  <b>equal (4)</b>                  5:13,18;8:7,8  <b>equally (1)</b>                  15:9  <b>equity (1)</b>                  15:10  <b>eschewed (1)</b>                  15:11  <b>especially (1)</b>                  13:25  <b>establish (1)</b>                  5:3  <b>ethnic (1)</b>                  6:8  <b>evaluated (1)</b>                  9:8  <b>even (2)</b>                  4:17;7:18  <b>evenings (1)</b>                  7:20  <b>event (1)</b>                  2:6  <b>everyone (3)</b>                  4:1;10:5;18:11  <b>evidence (1)</b>                  4:19  <b>example (1)</b>                  7:24  <b>exceeded (1)</b>                  14:11  <b>executive (1)</b>                  11:1  <b>existing (2)</b>                  6:22;11:25  <b>expert (1)</b>                  7:8  <b>experts (1)</b>                  7:6  <b>extent (1)</b>                  8:18  <b>extremely (1)</b>                  7:15</p>	<p style="text-align: center;"><b>F</b></p> <p><b>fact (1)</b>                  11:20  <b>fair (3)</b>                  10:14;11:6;13:5  <b>fairness (5)</b>                  9:4,10,12,21;15:11  <b>fastest (1)</b>                  12:20  <b>favor (5)</b>                  6:18;9:6,12;11:24;                  18:8  <b>favored (1)</b>                  6:13  <b>Federal (1)</b>                  8:7  <b>feel (1)</b>                  14:7  <b>fellow (1)</b>                  10:18  <b>female (1)</b>                  13:11  <b>fight (1)</b>                  12:6  <b>final (2)</b>                  14:7;15:7  <b>First (2)</b>                  10:11;13:10  <b>five (4)</b>                  8:10,15;14:12;15:2  <b>floor (2)</b>                  10:1;15:22  <b>focus (1)</b>                  10:22  <b>Following (1)</b>                  4:18  <b>foremost (1)</b>                  10:11  <b>formed (5)</b>                  5:6,11;6:17,23;9:5  <b>formulating (1)</b>                  4:13  <b>forth (3)</b>                  11:5,13,16  <b>fortunate (1)</b>                  4:22  <b>forward (1)</b>                  18:12  <b>four (1)</b>                  7:19  <b>full (1)</b>                  14:19  <b>Fuller (10)</b>                  3:18,19;10:2,3;                  13:15,22;15:23;                  17:17,18;18:6  <b>Furthermore (1)</b>                  6:1  <b>future (1)</b>                  10:10</p>	<p style="text-align: center;"><b>G</b></p> <p><b>garage (1)</b>                  2:5  <b>gave (1)</b>                  15:2  <b>general (1)</b>                  15:3  <b>geographically (1)</b>                  5:5  <b>gerrymander (1)</b>                  11:24  <b>given (1)</b>                  10:21  <b>goal (2)</b>                  11:5;13:5  <b>good (3)</b>                  3:23;7:17;10:5  <b>Gopal (4)</b>                  2:25;3:1;16:24,25  <b>Grateful (3)</b>                  13:20,21,25  <b>greatest (1)</b>                  15:14  <b>greatly (2)</b>                  4:12;7:8  <b>growing (2)</b>                  12:20;13:1  <b>guidance (1)</b>                  7:8</p> <p style="text-align: center;"><b>H</b></p> <p><b>happy (1)</b>                  18:12  <b>hear (1)</b>                  17:25  <b>heard (1)</b>                  13:7  <b>Hearing (2)</b>                  15:21;17:25  <b>hearings (5)</b>                  4:14,15,18;11:11;                  14:19  <b>held (2)</b>                  4:14;14:3  <b>helped (1)</b>                  10:25  <b>hereby (1)</b>                  2:6  <b>highest (1)</b>                  14:3  <b>highlights (1)</b>                  13:2  <b>hindered (1)</b>                  6:16  <b>history (1)</b>                  13:10  <b>holiday (1)</b>                  18:12  <b>home (1)</b>                  10:6</p>	<p><b>HON (12)</b>                  2:2;3:21;5:8;8:13;                  13:14;15:17;16:1,5;                  17:20;18:4,7,10  <b>honored (1)</b>                  10:15</p> <p style="text-align: center;"><b>I</b></p> <p><b>ideal (1)</b>                  5:14  <b>imagine (1)</b>                  7:23  <b>impact (2)</b>                  14:10;15:3  <b>impaired (1)</b>                  6:16  <b>important (2)</b>                  10:8;12:25  <b>improve (1)</b>                  7:21  <b>improved (1)</b>                  14:23  <b>incarcerated (1)</b>                  5:11  <b>include (2)</b>                  5:20;6:22  <b>including (1)</b>                  14:9  <b>increase (1)</b>                  12:8  <b>increased (1)</b>                  12:16  <b>increases (1)</b>                  12:19  <b>incredibly (1)</b>                  10:8  <b>incumbents (1)</b>                  6:21  <b>influence (2)</b>                  12:20,24  <b>Innovation (1)</b>                  7:9  <b>interest (4)</b>                  6:7,11;8:24;14:22  <b>interests (1)</b>                  7:13  <b>Interruption (2)</b>                  5:7;8:12  <b>into (1)</b>                  9:10  <b>issue (1)</b>                  12:13</p> <p style="text-align: center;"><b>J</b></p> <p><b>Jeanne (1)</b>                  14:1  <b>Jersey (6)</b>                  4:12;7:13;10:23;                  12:15;14:7;15:15  <b>Jones (1)</b>                  11:1</p>
<p style="text-align: center;"><b>E</b></p> <p><b>earned (1)</b>                  14:4  <b>easy (1)</b>                  7:23  <b>economic (1)</b>                  6:8  <b>effort (3)</b>                  7:17,21;10:22  <b>eight (1)</b>                  12:25  <b>either (1)</b>                  15:5  <b>elect (2)</b>                  5:23;15:4  <b>election (4)</b>                  6:19;9:7;11:8;15:4  <b>elections (1)</b>                  14:10  <b>Electoral (1)</b>                  7:9</p>	<p><b>event (1)</b>                  2:6  <b>everyone (3)</b>                  4:1;10:5;18:11  <b>evidence (1)</b>                  4:19  <b>example (1)</b>                  7:24  <b>exceeded (1)</b>                  14:11  <b>executive (1)</b>                  11:1  <b>existing (2)</b>                  6:22;11:25  <b>expert (1)</b>                  7:8  <b>experts (1)</b>                  7:6  <b>extent (1)</b>                  8:18  <b>extremely (1)</b>                  7:15</p>	<p><b>fact (1)</b>                  11:20  <b>fair (3)</b>                  10:14;11:6;13:5  <b>fairness (5)</b>                  9:4,10,12,21;15:11  <b>fastest (1)</b>                  12:20  <b>favor (5)</b>                  6:18;9:6,12;11:24;                  18:8  <b>favored (1)</b>                  6:13  <b>Federal (1)</b>                  8:7  <b>feel (1)</b>                  14:7  <b>fellow (1)</b>                  10:18  <b>female (1)</b>                  13:11  <b>fight (1)</b>                  12:6  <b>final (2)</b>                  14:7;15:7  <b>First (2)</b>                  10:11;13:10  <b>five (4)</b>                  8:10,15;14:12;15:2  <b>floor (2)</b>                  10:1;15:22  <b>focus (1)</b>                  10:22  <b>Following (1)</b>                  4:18  <b>foremost (1)</b>                  10:11  <b>formed (5)</b>                  5:6,11;6:17,23;9:5  <b>formulating (1)</b>                  4:13  <b>forth (3)</b>                  11:5,13,16  <b>fortunate (1)</b>                  4:22  <b>forward (1)</b>                  18:12  <b>four (1)</b>                  7:19  <b>full (1)</b>                  14:19  <b>Fuller (10)</b>                  3:18,19;10:2,3;                  13:15,22;15:23;                  17:17,18;18:6  <b>Furthermore (1)</b>                  6:1  <b>future (1)</b>                  10:10</p>	<p style="text-align: center;"><b>H</b></p> <p><b>happy (1)</b>                  18:12  <b>hear (1)</b>                  17:25  <b>heard (1)</b>                  13:7  <b>Hearing (2)</b>                  15:21;17:25  <b>hearings (5)</b>                  4:14,15,18;11:11;                  14:19  <b>held (2)</b>                  4:14;14:3  <b>helped (1)</b>                  10:25  <b>hereby (1)</b>                  2:6  <b>highest (1)</b>                  14:3  <b>highlights (1)</b>                  13:2  <b>hindered (1)</b>                  6:16  <b>history (1)</b>                  13:10  <b>holiday (1)</b>                  18:12  <b>home (1)</b>                  10:6</p>	<p><b>HON (12)</b>                  2:2;3:21;5:8;8:13;                  13:14;15:17;16:1,5;                  17:20;18:4,7,10  <b>honored (1)</b>                  10:15</p> <p style="text-align: center;"><b>I</b></p> <p><b>ideal (1)</b>                  5:14  <b>imagine (1)</b>                  7:23  <b>impact (2)</b>                  14:10;15:3  <b>impaired (1)</b>                  6:16  <b>important (2)</b>                  10:8;12:25  <b>improve (1)</b>                  7:21  <b>improved (1)</b>                  14:23  <b>incarcerated (1)</b>                  5:11  <b>include (2)</b>                  5:20;6:22  <b>including (1)</b>                  14:9  <b>increase (1)</b>                  12:8  <b>increased (1)</b>                  12:16  <b>increases (1)</b>                  12:19  <b>incredibly (1)</b>                  10:8  <b>incumbents (1)</b>                  6:21  <b>influence (2)</b>                  12:20,24  <b>Innovation (1)</b>                  7:9  <b>interest (4)</b>                  6:7,11;8:24;14:22  <b>interests (1)</b>                  7:13  <b>Interruption (2)</b>                  5:7;8:12  <b>into (1)</b>                  9:10  <b>issue (1)</b>                  12:13</p> <p style="text-align: center;"><b>J</b></p> <p><b>Jeanne (1)</b>                  14:1  <b>Jersey (6)</b>                  4:12;7:13;10:23;                  12:15;14:7;15:15  <b>Jones (1)</b>                  11:1</p>

<p><b>Judge (3)</b> 4:22;5:9;7:7 <b>Justice (4)</b> 10:12;12:14;15:23; 16:3</p>	<p>11:25 <b>maintained (1)</b> 15:2 <b>maintaining (1)</b> 12:17</p>	<p><b>moment (1)</b> 10:24 <b>months (1)</b> 13:8 <b>more (2)</b> 11:11;12:5 <b>morning (4)</b> 3:23,24;4:5;10:5 <b>most (2)</b> 13:9;15:8 <b>motion (4)</b> 15:21;16:4;17:21, 25</p>	<p><b>occasions (1)</b> 18:13 <b>offer (1)</b> 13:13 <b>one (5)</b> 7:25,25;8:23;9:3; 11:24 <b>only (4)</b> 6:2;8:17;9:3;11:21 <b>open (2)</b> 10:1;11:9 <b>opportunities (2)</b> 12:8;14:10 <b>opportunity (6)</b> 5:22;9:22;12:22; 13:12,20;15:3</p>	<p><b>phones (1)</b> 4:2 <b>please (4)</b> 2:7;4:2;16:6;18:11 <b>pleasure (1)</b> 13:24 <b>political (7)</b> 5:23;6:6,10,18;9:6; 11:25;13:7 <b>population (12)</b> 5:6,10,14,15;8:7,8; 12:5,17,21;14:14,15; 15:9 <b>positively (1)</b> 7:16 <b>possible (2)</b> 5:14;7:2 <b>preceding (1)</b> 6:25 <b>prepared (3)</b> 3:24;4:5,24 <b>preparing (1)</b> 4:21 <b>Present (4)</b> 2:11,14,23;3:7 <b>presented (2)</b> 4:7;15:24 <b>preservation (1)</b> 8:25 <b>preserved (1)</b> 12:24 <b>primary (2)</b> 11:5;13:5 <b>Princeton (1)</b> 7:10 <b>principles (1)</b> 11:16 <b>prior (1)</b> 5:12 <b>prisoners (1)</b> 5:12 <b>privilege (2)</b> 7:6;10:7 <b>privileged (1)</b> 12:15 <b>problems (1)</b> 2:5 <b>proceedings (2)</b> 5:7;8:12 <b>process (12)</b> 4:13,20;5:1;7:7,15, 23;8:4;10:15;11:9; 13:21;15:8,10 <b>processes (1)</b> 5:23 <b>produced (1)</b> 8:4 <b>professionalism (1)</b> 13:22 <b>promote (1)</b> 15:10 <b>proposal (2)</b> 8:10,15</p>
<p style="text-align: center;"><b>K</b></p>	<p><b>maintains (1)</b> 11:23 <b>majority (1)</b> 12:17 <b>majority/minority (4)</b> 8:10,15;12:1;14:13 <b>making (1)</b> 9:15 <b>mandate (1)</b> 8:7 <b>many (1)</b> 7:16 <b>map (31)</b> 4:8,21;5:19;7:6,17, 21,22;9:3,13,17,18, 19,23;10:25;11:6,13, 23;12:12,14,19;13:2, 4,6;14:6,7,8,23,24; 15:13,24;17:22 <b>mapmaker (1)</b> 11:3 <b>Mapmakers (3)</b> 5:3,16;6:9 <b>map-making (1)</b> 4:25 <b>maps (10)</b> 4:13,17;8:5,6,9,13, 17,22;9:2,8 <b>Mark (2)</b> 14:2,2 <b>may (3)</b> 6:17,22;9:5 <b>meaningful (2)</b> 12:2;14:9 <b>meaningfully (1)</b> 15:3 <b>measure (1)</b> 14:22 <b>meet (1)</b> 7:24 <b>meeting (3)</b> 2:6;7:20;10:8 <b>member (2)</b> 7:14;15:13 <b>members (2)</b> 15:19;18:9 <b>met (1)</b> 14:10 <b>Michele (1)</b> 14:1 <b>minimizing (1)</b> 6:21 <b>minorities (1)</b> 5:22 <b>minority (6)</b> 12:3,7,9;14:9,14,15 <b>minority/majority (1)</b> 5:20</p>	<p><b>move (1)</b> 15:24 <b>moved (3)</b> 16:6;18:3,5 <b>much (4)</b> 4:3;13:18,18;18:11 <b>municipal (1)</b> 11:20 <b>municipalities (1)</b> 11:22 <b>must (2)</b> 5:13;12:13 <b>mute (1)</b> 4:2</p>	<p><b>order (2)</b> 2:7;7:24 <b>others (2)</b> 4:16;5:25 <b>outcomes (1)</b> 15:4 <b>outset (2)</b> 4:9;11:4 <b>outstanding (2)</b> 7:5,12 <b>over (1)</b> 13:7</p>	
<p><b>KRUGER (26)</b> 2:9,12,15,18,21,24; 3:2,5,8,11,14,17,20; 16:8,11,14,17,20,23; 17:1,4,7,10,13,16,19</p>				
<p style="text-align: center;"><b>L</b></p>				
<p><b>Lab (1)</b> 7:9 <b>Lagos (4)</b> 2:22,23;16:21,22 <b>language (1)</b> 5:21 <b>last (1)</b> 9:19 <b>late (1)</b> 2:4 <b>Latino (1)</b> 12:24 <b>leadership (2)</b> 10:14;12:13 <b>least (1)</b> 2:4 <b>led (2)</b> 11:1,2 <b>LeFelt (2)</b> 4:23;5:9 <b>LeFelt's (2)</b> 7:8;14:20 <b>left (1)</b> 14:24 <b>legal (1)</b> 11:2 <b>limited (1)</b> 11:17 <b>linguistic (1)</b> 6:8 <b>list (1)</b> 4:9 <b>little (2)</b> 2:3,4 <b>LoGrippto (5)</b> 2:19,20;14:2;16:18, 19 <b>long (1)</b> 6:14 <b>look (1)</b> 18:12 <b>Lynda (1)</b> 14:1</p>		<p><b>move (1)</b> 15:24 <b>moved (3)</b> 16:6;18:3,5 <b>much (4)</b> 4:3;13:18,18;18:11 <b>municipal (1)</b> 11:20 <b>municipalities (1)</b> 11:22 <b>must (2)</b> 5:13;12:13 <b>mute (1)</b> 4:2</p>	<p style="text-align: center;"><b>N</b></p> <p><b>narrowly (2)</b> 6:4;8:20 <b>Nash (4)</b> 2:16,17;16:15,16 <b>nation (1)</b> 10:10 <b>nature (1)</b> 14:17 <b>nearly (2)</b> 11:12;14:24 <b>necessary (3)</b> 6:2,11;8:18 <b>neither (1)</b> 9:13 <b>Nevertheless (1)</b> 8:4 <b>New (8)</b> 4:11;6:23;7:13;8:1; 10:23;12:14;14:6; 15:15 <b>next (4)</b> 9:23;11:8,8;17:22 <b>nine (2)</b> 11:20;14:13 <b>none (2)</b> 15:21;17:25 <b>number (1)</b> 15:14 <b>numbers (1)</b> 5:20</p>	<p style="text-align: center;"><b>P</b></p> <p><b>Pagliughi (5)</b> 2:13,14;14:2;16:12, 13 <b>Parikh (1)</b> 11:2 <b>part (1)</b> 10:16 <b>participate (3)</b> 5:23;12:22;13:21 <b>participation (2)</b> 11:10;13:7 <b>particularly (1)</b> 10:20 <b>parties (1)</b> 7:14 <b>partisan (4)</b> 9:4,9,12;13:10 <b>parts (1)</b> 12:11 <b>party (4)</b> 6:18;9:6;11:25; 15:5 <b>past (1)</b> 13:8 <b>people (3)</b> 4:15;12:4,21 <b>percent (3)</b> 12:5;14:15,24 <b>person (4)</b> 4:14;6:19;7:25;9:7 <b>philosophy (1)</b> 14:21</p>
<p style="text-align: center;"><b>M</b></p>				
<p><b>maintain (1)</b></p>		<p style="text-align: center;"><b>O</b></p>		

<p><b>proposed (5)</b> 4:9,17;5:2;7:17;8:1</p> <p><b>Protection (1)</b> 5:18</p> <p><b>proud (1)</b> 11:11</p> <p><b>provide (1)</b> 5:21</p> <p><b>provided (3)</b> 6:23;14:8,12</p> <p><b>public (6)</b> 4:18,20;11:11,15; 13:7;14:19</p> <p><b>pulled (1)</b> 9:3</p> <p><b>purported (1)</b> 15:10</p> <p><b>put (2)</b> 11:5,13</p>	<p>7:13</p> <p><b>represents (1)</b> 12:14</p> <p><b>Republican (4)</b> 3:14;10:20;13:25; 17:13</p> <p><b>republicans (1)</b> 9:20</p> <p><b>required (1)</b> 7:3</p> <p><b>requirement (1)</b> 7:25</p> <p><b>requirements (2)</b> 6:5;8:21</p> <p><b>respect (1)</b> 14:5</p> <p><b>respected (1)</b> 6:9</p> <p><b>respective (2)</b> 7:14,21</p> <p><b>responded (1)</b> 7:16</p> <p><b>responsibility (1)</b> 12:6</p> <p><b>responsive (1)</b> 11:15</p> <p><b>result (1)</b> 15:7</p> <p><b>results (1)</b> 9:11</p> <p><b>right (2)</b> 12:7;16:6</p> <p><b>Rights (6)</b> 5:17;6:3;8:9,14,19; 12:11</p> <p><b>robust (2)</b> 11:10;13:6</p> <p><b>robustly (1)</b> 12:23</p> <p><b>role (2)</b> 2:8;16:7</p> <p><b>room (1)</b> 2:5</p>	<p>19</p> <p><b>seeing (1)</b> 18:13</p> <p><b>select (1)</b> 11:18</p> <p><b>service (5)</b> 10:13,17;13:12,24; 14:3</p> <p><b>set (1)</b> 11:16</p> <p><b>shall (8)</b> 5:3,4,16;6:2,3,8,9; 7:1</p> <p><b>shaped (1)</b> 7:2</p> <p><b>shortly (1)</b> 4:10</p> <p><b>show (1)</b> 12:13</p> <p><b>showed (1)</b> 9:11</p> <p><b>significance (1)</b> 10:9</p> <p><b>significantly (1)</b> 6:15</p> <p><b>Similarly (1)</b> 8:22</p> <p><b>simply (2)</b> 9:11,18</p> <p><b>solely (2)</b> 6:17;9:5</p> <p><b>sorry (1)</b> 2:3</p> <p><b>sought (1)</b> 10:14</p> <p><b>special (2)</b> 4:23;14:20</p> <p><b>spent (1)</b> 7:19</p> <p><b>spirit (2)</b> 15:16,16</p> <p><b>split (2)</b> 6:9;11:22</p> <p><b>splits (3)</b> 8:23;11:17,20</p> <p><b>staff (1)</b> 11:1</p> <p><b>Stan (1)</b> 15:18</p> <p><b>standard (1)</b> 14:11</p> <p><b>standards (9)</b> 4:8,10,24;5:2;6:12, 14,25;7:4;9:17</p> <p><b>started (1)</b> 2:3</p> <p><b>starts (1)</b> 3:25</p> <p><b>state (6)</b> 9:11;10:10,23;11:7; 12:4;14:5</p> <p><b>stated (1)</b> 18:9</p>	<p><b>Statehouse (1)</b> 10:8</p> <p><b>state's (5)</b> 11:21;12:20;14:17, 25;15:8</p> <p><b>statewide (1)</b> 9:9</p> <p><b>Steinhardt (9)</b> 3:15,16;10:21; 13:16,17;15:18; 17:14,15;18:2</p> <p><b>stops (1)</b> 3:25</p> <p><b>striking (1)</b> 12:11</p> <p><b>strong (1)</b> 14:21</p> <p><b>subdivision (2)</b> 6:6,10</p> <p><b>submitted (3)</b> 4:16,17,20</p> <p><b>substantially (3)</b> 4:8;6:24;8:8</p> <p><b>sufficient (1)</b> 5:20</p> <p><b>suggested (1)</b> 4:24</p> <p><b>summary (1)</b> 9:16</p> <p><b>Supreme (2)</b> 5:17;12:10</p> <p><b>sure (1)</b> 4:11</p>	<p><b>towns (2)</b> 11:18;14:21</p> <p><b>transparent (1)</b> 11:9</p> <p><b>tremendous (1)</b> 10:9</p> <p><b>try (1)</b> 4:4</p> <p><b>Turning (1)</b> 7:11</p> <p><b>two (4)</b> 4:13,19;7:23;8:5</p>
<b>R</b>				<b>U</b>
<p><b>race (2)</b> 6:2;8:17</p> <p><b>racial (2)</b> 5:21;12:13</p> <p><b>Raj (1)</b> 11:2</p> <p><b>real (1)</b> 12:2</p> <p><b>reasonable (1)</b> 5:22</p> <p><b>Redd (5)</b> 2:10,11;16:3,9,10</p> <p><b>redistricting (4)</b> 5:2;9:19,24;17:22</p> <p><b>reflected (1)</b> 14:16</p> <p><b>reflecting (1)</b> 12:20</p> <p><b>regard (1)</b> 14:4</p> <p><b>regularly (1)</b> 7:2</p> <p><b>relevant (1)</b> 5:17</p> <p><b>religious (1)</b> 6:8</p> <p><b>remarks (1)</b> 13:13</p> <p><b>remind (1)</b> 4:1</p> <p><b>repeat (1)</b> 8:16</p> <p><b>represent (1)</b> 12:5</p> <p><b>representation (3)</b> 12:2,8,9</p> <p><b>representative (2)</b> 11:6;13:6</p> <p><b>representatives (2)</b> 5:24;11:19</p> <p><b>represented (1)</b></p>	<p style="text-align: center;"><b>S</b></p> <p><b>safe (1)</b> 18:12</p> <p><b>Sarah (1)</b> 11:1</p> <p><b>satisfied (1)</b> 9:2</p> <p><b>satisfies (1)</b> 4:8</p> <p><b>satisfy (4)</b> 6:4;8:9,14,20</p> <p><b>second (5)</b> 16:2,4,6;18:5,6</p> <p><b>secretary (27)</b> 2:7,9,12,15,18,21, 24;3:2,5,8,11,14,17, 20;16:8,11,14,17,20, 23;17:1,4,7,10,13,16,</p>	<p><b>tailored (2)</b> 6:4;8:20</p> <p><b>team (4)</b> 7:17,20;9:8;11:2</p> <p><b>testified (1)</b> 4:16</p> <p><b>testifying (1)</b> 11:12</p> <p><b>testimony (2)</b> 4:17;14:18</p> <p><b>tests (3)</b> 9:9,11,14</p> <p><b>throughout (2)</b> 7:10,15</p> <p><b>Thus (1)</b> 9:21</p> <p><b>today (6)</b> 10:6,7;11:14;13:3; 15:15;17:24</p> <p><b>together (1)</b> 4:23</p> <p><b>Tom (1)</b> 11:3</p> <p><b>total (2)</b> 5:5,10</p> <p><b>town (1)</b> 8:23</p>	<p style="text-align: center;"><b>T</b></p> <p><b>various (1)</b> 9:9</p> <p><b>view (1)</b> 8:4</p> <p><b>violation (2)</b> 6:3;8:18</p> <p><b>virtues (1)</b> 15:12</p> <p><b>voice (1)</b> 13:1</p> <p><b>voices (1)</b> 11:15</p> <p><b>vote (3)</b> 8:1;9:18;15:15</p> <p><b>voter (2)</b> 6:21;15:1</p> <p><b>voters (9)</b> 6:20;12:3,7;14:7,8, 9,25;15:2,15</p> <p><b>Voting (9)</b> 5:17;6:3;8:9,14,19; 11:14;12:11;14:14; 15:9</p>	
				<b>V</b>
				<b>W</b>
				<p><b>wake (1)</b> 12:10</p> <p><b>WALLACE (21)</b> 2:2;3:20,21;5:8; 8:13;10:4,12,12; 11:17;13:11,14; 15:17,24;16:1,4,5;</p>

17:19,20;18:4,7,10 <b>watching (1)</b> 10:6 <b>way (1)</b> 11:19 <b>weight (1)</b> 9:15 <b>welcome (1)</b> 2:2 <b>wish (3)</b> 10:1;15:19;16:4 <b>Without (1)</b> 9:10 <b>witnesses (1)</b> 11:12 <b>work (1)</b> 7:6 <b>written (1)</b> 4:16	<b>5 (1)</b> 6:17 <b>565 (1)</b> 11:21			
	<b>6</b>			
	<b>6 (1)</b> 6:20			
	<b>7</b>			
	<b>7 (1)</b> 7:1 <b>773,585 (1)</b> 5:15			
	<b>8</b>			
<b>Z</b>	<b>85 (1)</b> 14:24			
<b>Zoom (1)</b> 4:15				
<b>1</b>				
<b>1 (3)</b> 5:3;6:12,14 <b>10 (2)</b> 4:14;12:17 <b>11 (1)</b> 14:19 <b>12 (2)</b> 5:3;8:7 <b>13th (1)</b> 15:13 <b>14 (1)</b> 11:21				
<b>2</b>				
<b>2 (3)</b> 5:16;6:12,14 <b>200 (2)</b> 4:15;11:12				
<b>3</b>				
<b>3 (2)</b> 6:6,15 <b>30 (1)</b> 14:14				
<b>4</b>				
<b>4 (2)</b> 6:13,14 <b>48 (1)</b> 12:5				
<b>5</b>				

# **EXHIBIT B**

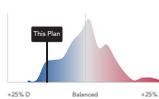
# NJ CD Adopted 2022.zip

State	Legislative	Added to PlanScore
New Jersey	U.S. House	Dec. 25, 2021

PlanScore bases its scores on predicted precinct-level votes for each office (State House, State Senate, and U.S. House) built from past election results and U.S. Census data. [More information about the predictive model used to score this plan.](#)

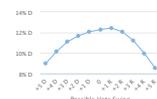
## Charts and Graphs

Efficiency Gap: 12.3% D



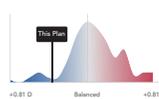
Votes for Democratic candidates are expected to be inefficient at a rate 12.3% D lower than votes for Republican candidates, favoring Democrats in 96% of predicted scenarios.\* [Learn more.](#)

Sensitivity Testing



Sensitivity testing shows us a plan's expected efficiency gap given a range of possible vote swings. It lets us evaluate the durability of a plan's skew.

Declination: 0.37 D



The difference between mean Republican vote share in Republican districts and mean Democratic vote share in Democratic districts along with the relative fraction of seats won by each party leads to a declination that favors Democrats in 94% of predicted scenarios.\* [Learn more.](#)

### Partisan Bias

The parties' statewide vote shares are 57.4% (Democratic) and 42.6% (Republican) based on the model. Partisan bias is shown only where the parties' statewide vote shares fall between 45% and 55%. Outside this range the metric's assumptions are not plausible.

### Mean-Median Difference

The parties' statewide vote shares are 57.4% (Democratic) and 42.6% (Republican) based on the model. The mean-median difference is shown only where the parties' statewide vote shares fall between 45% and 55%. Outside this range the metric's assumptions are not plausible.

## District Map



## District Data

District	Candidate Scenario	Pop. 2020	Hispanic CVAP 2019	Black CVAP 2019	Asian CVAP 2019	Non-Hisp. Native CVAP 2019	Chance of 1+ Flips†	Chance of Democratic Win	Predicted Vote Shares	Biden (D) 2020	Trump (R) 2020
1	Democratic Incumbent	771,744	9.7%	16.5%	4.3%	0.3%	No	97%	61% D / 39% R	247,698	149,378
2	Republican Incumbent	779,056	10.4%	12.0%	3.1%	0.5%	No	5%	40% D / 60% R	192,376	212,664
3	Democratic Incumbent	778,024	7.2%	13.1%	6.3%	0.3%	No	88%	56% D / 44% R	248,285	186,999
4	Republican Incumbent	772,969	6.2%	3.5%	2.6%	0.2%	No	1%	33% D / 67% R	163,178	259,023
5	Democratic Incumbent	773,218	12.2%	6.1%	12.0%	0.3%	Yes	86%	56% D / 44% R	240,213	186,615
6	Democratic Incumbent	773,768	17.3%	12.9%	13.0%	0.3%	No	95%	59% D / 41% R	197,842	133,288
7	Democratic Incumbent	774,294	7.8%	4.9%	6.1%	0.3%	Yes	64%	52% D / 48% R	235,437	217,988
8	Democratic Incumbent	772,366	46.3%	10.6%	7.3%	0.2%	No	>99%	70% D / 30% R	174,541	64,834
9	Democratic Incumbent	772,060	32.5%	9.7%	7.8%	0.2%	No	96%	59% D / 41% R	185,569	126,030
10	Democratic Incumbent	773,536	15.4%	52.9%	6.0%	0.3%	No	>99%	78% D / 22% R	234,198	53,936
11	Democratic Incumbent	773,263	11.8%	6.6%	8.7%	0.2%	No	92%	58% D / 42% R	252,635	178,811
12	Democratic Incumbent	774,696	11.8%	18.6%	13.5%	0.3%	No	>99%	66% D / 34% R	236,360	114,098

Predicted 77% D / 23% R seat share across scenarios\* vs. 57% D / 43% R vote share. [Download raw data as tab-delimited text.](#)

Metric	Value	Favors Democrats in this % of Scenarios†	More Skewed than this % of Historical Plans‡	More Pro-Democratic than this % of Historical Plans‡
Efficiency Gap	12.3% Pro-Democratic	96%	90%	94%
Declination	0.37 Pro-Democratic	94%	85%	94%
Partisan Bias	N/A	N/A	N/A	N/A
Mean-Median Difference	N/A	N/A	N/A	N/A

### Freedom to Vote Act Races

Section 503(c)(3) of the FVIA specifies that partisan fairness should be assessed using a state's two most recent elections for U.S. President and two most recent elections for U.S. Senate.

U.S. President 2020: 17.2% D	U.S. President 2016: 10.4% D	U.S. Senate 2020: 16.7% D	U.S. Senate 2018: 13.5% D
Under this plan, votes for the Democratic candidate were inefficient at a rate 17.2% D lower than votes for the Republican candidate.	Under this plan, votes for the Democratic candidate were inefficient at a rate 10.4% D lower than votes for the Republican candidate.	Under this plan, votes for the Democratic candidate were inefficient at a rate 16.7% D lower than votes for the Republican candidate.	Under this plan, votes for the Democratic candidate were inefficient at a rate 13.5% D lower than votes for the Republican candidate.

\* Scenarios are part of the predictive model used to score this plan.  
 † 50%+ chance of one or more party flips assuming the plan is used for one decade with five State House elections, five U.S. House elections, or three State Senate elections.  
 ‡ Enacted U.S. House, State House, and State Senate plan metrics are featured in our historical dataset.



PlanScore is a project of Campaign Legal Center.



# NJ\_congress\_2021\_GOP\_V5\_HOSPITAL\_shoreline.csv

<b>State</b> New Jersey	<b>Legislative</b> U.S. House	<b>Added to PlanScore</b> Jan. 4, 2022
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PlanScore bases its scores on predicted precinct-level votes for each office (State House, State Senate, and U.S. House) built from past election results and U.S. Census data. [More information about the predictive model used to score this plan.](#)

## Charts and Graphs

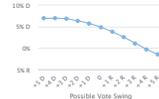
Efficiency Gap: 4.9% D



Votes for Democratic candidates are expected to be inefficient at a rate 4.9% D lower than votes for Republican candidates, favoring Democrats in 75% of predicted scenarios.\*

[Learn more >](#)

Sensitivity Testing



Sensitivity testing shows us a plan's expected efficiency gap given a range of possible vote swings. It lets us evaluate the durability of a plan's skew.

Declination: 0.09 D



The difference between mean Republican vote share in Republican districts and mean Democratic vote share in Democratic districts along with the relative fraction of seats won by each party leads to a declination that favors Democrats in 61% of predicted scenarios.\*

[Learn more >](#)

Partisan Bias

The parties' statewide vote shares are 57.8% (Democratic) and 42.2% (Republican) based on the model. Partisan bias is shown only where the parties' statewide vote shares fall between 45% and 55%. Outside this range the metric's assumptions are not plausible.

Mean-Median Difference

The parties' statewide vote shares are 57.8% (Democratic) and 42.2% (Republican) based on the model. The mean-median difference is shown only where the parties' statewide vote shares fall between 45% and 55%. Outside this range the metric's assumptions are not plausible.

## District Map



## District Data

District	Candidate Scenario	Pop. 2020	Non-Hisp. Hispanic CVAP 2019	Non-Hisp. Black CVAP 2019	Non-Hisp. Asian CVAP 2019	Non-Hisp. Native CVAP 2019	Chance of 1+ Flips†	Chance of Democratic Win	Predicted Vote Shares	Biden (D) 2020	Trump (R) 2020
1	Democratic Incumbent	771,757	9.6%	16.3%	4.2%	0.3%	No	>99%	61% D / 39% R	247,468	152,928
2	Republican Incumbent	779,060	10.4%	11.7%	3.1%	0.5%	No	2%	40% D / 60% R	189,799	215,701
3	Democratic Incumbent	777,920	6.7%	11.5%	3.3%	0.3%	Yes	51%	50% D / 50% R	227,964	216,957
4	Republican Incumbent	773,013	6.8%	5.0%	5.6%	0.2%	No	<1%	39% D / 61% R	184,901	223,763
5	Democratic Incumbent	773,239	13.0%	4.0%	9.0%	0.2%	Yes	71%	53% D / 47% R	231,905	199,531
6	Democratic Incumbent	773,821	17.4%	11.9%	12.6%	0.3%	No	93%	57% D / 43% R	193,260	139,547
7	Democratic Incumbent	774,355	7.4%	3.5%	6.8%	0.3%	Yes	57%	51% D / 49% R	236,945	215,444
8	Democratic Incumbent	772,175	46.5%	12.4%	6.8%	0.2%	No	>99%	73% D / 27% R	173,534	63,121
9	Democratic Incumbent	772,093	33.2%	12.6%	12.0%	0.3%	No	>99%	64% D / 36% R	197,087	104,887
10	Democratic Incumbent	773,432	15.7%	54.6%	6.2%	0.3%	No	>99%	84% D / 16% R	242,608	43,573
11	Democratic Incumbent	773,240	10.6%	5.0%	7.9%	0.3%	Yes	73%	53% D / 47% R	237,972	202,613
12	Democratic Incumbent	774,689	11.7%	20.0%	13.8%	0.3%	No	>99%	69% D / 31% R	244,886	105,200

Predicted 71% D / 29% R seat share across scenarios\* vs. 58% D / 42% R vote share.

[Download raw data as tab-delimited text.](#)

Metric	Value	Favors Democrats in this % of Scenarios*	More Skewed than this % of Historical Plans†	More Pro-Democratic than this % of Historical Plans‡
Efficiency Gap	4.9% Pro-Democratic	75%	49%	73%
Declination	0.09 Pro-Democratic	61%	36%	73%
Partisan Bias	N/A	N/A	N/A	N/A
Mean-Median Difference	N/A	N/A	N/A	N/A

Freedom to Vote Act Races

Section 502(c)(3) of the FVA specifies that partisan fairness should be assessed using a state's two most recent elections for U.S. President and two most recent elections for U.S. Senate.

U.S. President 2020: 17.2% D

Under this plan, votes for the Democratic candidate were inefficient at a rate 17.2% D lower than votes for the Republican candidate.

U.S. President 2016: 2.1% D

Under this plan, votes for the Democratic candidate were inefficient at a rate 2.1% D lower than votes for the Republican candidate.

U.S. Senate 2020: 16.7% D

Under this plan, votes for the Democratic candidate were inefficient at a rate 16.7% D lower than votes for the Republican candidate.

U.S. Senate 2018: 11.5% R

Under this plan, votes for the Republican candidate were inefficient at a rate 11.5% R lower than votes for the Democratic candidate.

\* Scenarios are part of the predictive model used to score this plan.

† 50%+ chance of one or more party flips assuming the plan is used for one decade with five State House elections, five U.S. House elections, or three State Senate elections.

‡ Enacted U.S. House, State House, and State Senate plan metrics are featured in our [historical datasets](#).

# EXHIBIT C

🕒 January 5, 2022



Home > Congress >

Democrats Were Huge Contributors To Campaign Of Redistricting Tiebreaker's Wife



Former Supreme Court Justice John E. Wallace, Jr. (Photo: Brown & Connery).

## Democrats were huge contributors to campaign of redistricting tiebreaker's wife

*Barbara Wallace contributed to congresswoman, DCCC, Stop Republicans PAC in 2021 while her husband was the independent tiebreaker on N.J. Congressional Redistricting Commission*

By [David Wildstein](#), January 04 2022 2:32 pm

John E. Wallace, Jr. sided with Democrats on a new map last month, but it's not clear whether the New Jersey Supreme Court was aware of sizeable campaign contributions involving his politically active wife [before they picked him to serve as the independent tiebreaker](#).

Barbara Wallace, who served on the staffs of Gov. Jon Corzine and U.S. Senator Frank Lautenberg, received substantial campaign contributions from stakeholders in the congressional redistricting process during her campaigns for mayor of Washington Township in Gloucester County about a decade ago.

A spokesperson for the court declined to say if justices knew about donations made by and to Mrs. Wallace before they voted to select her husband, a former state Supreme Court Justice, as the 13th member of the panel that redrew New Jersey's twelve House districts. John Wallace had been nominated by the Democrats and former Superior Court Judge Marina Corodemus was the candidate Republicans wanted.

Last year, Barbara Wallace contributed \$250 to Rep. Bonnie Watson Coleman (D-Ewing) and \$500 to U.S. Senator Bob Menendez in June, records show. She also made a small contributions to a federal PAC called Stop Republicans. In 2020, she made donations to Joe Biden and Democratic congressional candidate Amy Kennedy.

But more alarming to Republicans are the donors to her own mayoral campaigns.

She raised over \$84,000 in 2011, when she was the Democratic candidate for mayor in a special election for a one-year unexpired term. That race was largely funded by supporters of the South Jersey Democratic machine, including \$24,600 from the legislative campaign fund of 4th district Democrats – State Sen. Fred Madden (D-Washington) is the Gloucester County Democratic Chairman — \$7,200 from the New Jersey Regional Council of Carpenters, \$4,500 from Watson Coleman, and \$8,200 from Sheila Oliver, who was the Assembly Speaker at the time.

Her contributors also included other building trades unions – including Ironworkers Local 399, which is headed by Richard Sweeney — and Democratic elected officials.

When Mrs. Wallace sought a full-term in 2012, her donors included \$8,200 each from Senate President Steve Sweeney, the Gloucester County Democratic Organization, and the Carpenters union, and \$3,500 from Madden. She raised nearly \$72,000 for that race, mostly from allies of the party organization.

In 2016, Gloucester County Democrats declined to support Mrs. Wallace for re-election, and she lost the Democratic primary to Joann Gattinelli by a 59%-41% margin. In that race, she received a \$2,500 donation from Corzine and \$4,600 from political action committees affiliated with the Communications Workers of America. Without party support, she only raised about \$10,000 for her campaign.

While Wallace, as a judge, might have been forced to recuse himself from a matter that was tied to his wife, it's not clear whether a redistricting tiebreaker was obligated to self-disclose the political contributions that are part of a public record.

Should Wallace have taken on the tiebreaker post knowing of the campaign contributions made by Democrats to his wife?

"It's not actual conflicts, it's appearances of conflicts," said Micah Rasmussen, the director of the Rebovich Institute of New Jersey Politics at Rider University, in an appearance on the New Jersey Globe Power Hour on Talk Radio 77 WABC. "Maybe he should have taken a walk on this one."

John Wallace ended his 27-year judicial career in 2011 when Republican Gov. Chris Christie refused to renominate him to a tenured term. He is now affiliated with a politically influential South Jersey law firm with close ties to Democratic powerbroker George Norcross, Brown & Connery. Bill Tambussi, a partner at the firm, has been the counsel to the Camden County Democratic organization for 32 years and is the personal attorney for George E. Norcross III, a major Democratic powerbroker.

The Supreme Court did not seek any input from the redistricting commissioners before choosing Wallace over Corodemus, and did not interview either of the candidates, the New Jersey Globe has learned.

Republicans did not raise the issue of campaign contributions during the map-drawing process – indeed, it's not clear they knew about them prior to Wallace's vote – but that might not have mattered.

"Wallace had all the power," said one Republican leader, who spoke on the condition of anonymity "It's not like we could have questioned his integrity, even privately, without taking a risk that he would hold it against us."

After Wallace picked the Democratic map on December 22, the GOP redistricting chairman, Doug Steinhardt, told the New Jersey Globe that he wasn't surprised.

"Wallace was never a 13th member," Steinhardt said. "He was a 7th Democrat."

John Wallace did not immediately respond to a 1:08 PM email.

*Correction: an earlier version of this story incorrectly reported a small contribution to the Democratic Congressional Campaign Committee.*

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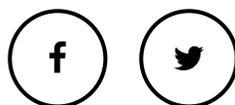
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NAME OF COMMITTEE (In Full)  
**Bonnie Watson Coleman for Congress**

**A.** Full Name (Last, First, Middle Initial)  
**Broudy, Warren, , ,**

Mailing Address 707 Stuyvesant Pl

City Mount Laurel	State NJ	Zip Code 08054-3233
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**ActBlue**

Mailing Address PO Box 382110

City Cambridge	State MA	Zip Code 02238-2110
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**C.** Full Name (Last, First, Middle Initial)  
**Wallace, Barbara, A., ,**

Mailing Address 21 Berkshire Dr

City Sewell	State NJ	Zip Code 08080-3102
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FEC ID number of contributing federal political committee. **C**

Name of Employer Washington Township	Occupation Mayor
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