STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

BRIAN F. EGOLF, JR, HAKIM BELLAMY, MEL HOLGUIN, MAURILIO CASTRO, and ROXANNE SPRUCE BLY,

Plaintiffs,

NO. D-101-CV-2011-02942

v.

DIANNA J. DURAN, in her official capacity as New Mexico Secretary of State, SUSANA MARTINEZ, in her official capacity as New Mexico Governor, JOHN A. SANCHEZ, in his official capacity as New Mexico Lieutenant Governor and presiding officer of the New Mexico Senate, TIMOTHY Z. JENNINGS, in his official capacity as President Pro-Tempore of the New Mexico Senate, and BEN LUJAN, SR., in his official capacity as Speaker of the New Mexico House of Representatives,

CONSOLIDATED WITH
D-101-CV-2011-02944
D-101-CV-2011-02945
D-101-CV-2011-03016
D-101-CV-2011-03099
D-101-CV-2011-03107
D-202-CV-2011-09600
D-506-CV-2011-00913

Defendants.

MULTI-TRIBAL PLAINTIFFS'[1] TRIAL BRIEF FOR REDISTRICTING OF THE NEW MEXICO SENATE

[1]This Trial Brief is respectfully submitted, through their undersigned counsel, by the Pueblo of Laguna, Pueblo of Acoma, Jicarilla Apache Nation, Pueblo of Zuni, Pueblo of Santa Ana, Pueblo of Isleta, Governor Richard Luarkie, Lt. Governor Harry A. Antonio, Jr., Lt. Governor David F. Garcia, President Levi Pesata, and Leon Reval, who are the named plaintiffs in Case No. D-0101-CV-2011-03016 of these consolidated cases. These plaintiffs will be referred to collectively herein as the "Multi-Tribal Plaintiffs" for convenience.

I. Introduction.

The Multi-Tribal Plaintiffs and Navajo Nation Intervenors' Unified Senate Plan ("Unified Native American Plan") proposes three majority Native American Senate districts and one influence district. The Multi-Tribal Plaintiffs believe the plan as presented presents the best opportunity for Native Americans in the northwest quadrant to elect candidates of choice and senators responsive to their communities and concerns.

The United States Supreme Court has recognized that influence districts, while not mandated by the Voting Rights Act, provide a good remedy and good policy for a state to adopt to increase the influence of minorities in the legislative process. *Georgia v. Ashcroft*, 539 U.S. 461, 482 (2003). New Mexico's northwest quadrant is a perfect place for an influence district because it can be done while still maintaining three strong majority Native American districts. The influence district in Senate 30 is created at the same time that the three majority Native American districts are evened out and unpacked, thereby sharing the minority voters and "influence in the districts next door." *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994) (discussing unpacking districts to remedy vote dilution) (citing *Voinovich v. Quilter*, 507 U.S. 146, 153-154 (1993).

The three Pueblos with population in the influence district all have strong communities of interest ties to District 30 and each other. The strongest bond, is of course, Mt. Taylor. The Navajo Nation, another of the nominating tribes to have Mt. Taylor recognized by the State as a Traditional Cultural Property, similarly has strong affiliation with Mt. Taylor and is in District 30. The district

is therefore a representation of the defined communities of interest and tribal boundaries of four Native American nations. Importantly, the proposed influence district retains, as its core from the current district, its characteristic as a Cibola County Senate seat.

The current plan for the Senate, which was adopted in 2001, is both constitutionally mal-apportioned and violative of Section 2 of the Voting Rights Act because instead of three majority Native American districts, there are only two. While the 2001 redistricting created three majority Native American districts, the population growth in Rio Rancho reduced the non-Hispanic Native American Voting Age Population ("VAP") in District 22 to 47.4%. The population growth caused the district to be over ideal population by 24.4%.

The Unified Native American Plan remedies this deficiency by unpacking Districts 3, 4, and 22 and moving several of the non-Native American precincts out of these districts. These precincts have more in common with the suburban communities of Bernalillo and Rio Rancho districts into which they have been moved.

II. Multi-Tribal Plaintiffs Proof of The Three *Gingles* Preconditions and Totality of Circumstance Test.

To support the creation of the Unified Native American Plan, the Multi-Tribal Plaintiffs rely on the proof submitted during the House trial that the three *Gingles* pre-conditions are met and that under the totality of the circumstances, Native Americans have less opportunity than other members

of the electorate to participate in the electoral process.[2] The evidence provided in the House trial on these factors references the same Native American communities present in the Senate hearing. The racially polarized voting analysis included three Senate district contests: Senate Districts 4, 22 and 30. Multi-Tribal Ex. 2. The Section 2 consent decrees, which were discussed in the House trial and House closing brief, apply to Cibola and Sandoval counties - which comprise proposed Senate Districts 4, 22 and 30. Multi-Tribal Exs. 12, 20. Similarly, the electoral irregularities suffered by Laguna and Acoma, which were also presented in the House trial, are equally applicable to the New Mexico Senate and House elections. As this brief is written, the Multi-Tribal Plaintiffs do not know whether the Court will have determined that they have met the *Gingles* pre-conditions and totality of circumstances test. If the Court determines there are elements lacking, the Multi-Tribal Plaintiffs will endeavor to provide that additional evidence to support the proposed Senate districts in the Native American Plan.

The proportionality inquiry discussed in *League of United Latin American Citizens* ("*LULAC*") *v. Perry*, 548 U.S. 399 (2006), for the Senate shows that if Native Americans were represented in the Senate consistent with their population, there would be four Native American Senators - at present there are only two Native American Senators. The proportionality inquiry highlights the need to be sensitive to the proposal to create three majority Native American districts,

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[2]The Multi-Tribal Plaintiffs hereby adopt and incorporate herein by reference Sections III through VI, and XI of their Closing Brief for Redistricting of the New Mexico House of Representatives, which was filed with the Court on December 28, 2011, as applicable to the redistricting of both the State House and Senate.

and an influence district.

III. Communities of Interest and Characteristics of Proposed Multi-Tribal Senate Districts.

The Multi-Tribal Plaintiffs, together with the Navajo Nation Intervenors, propose the creation of Senate Districts 1-4, 22, 29 and 30[3] as reflected in the Unified Native American Plan map. The Multi-Tribal Plaintiffs will focus their discussion here on Districts 4, 22, 29 and 30. Discussion of Districts 1-3 will be the focus of the Navajo Nation Intervenors.

District 4 is a majority Native American district that has both Navajo and Zuni precincts. Because the district did not keep up with population growth, it had to stretch into San Juan County for population. The total Native American VAP is 68.3%. Professor Engstrom will testify that this VAP will provide a reasonable opportunity for Native Americans to elect a candidate of their choice. The election history of the current district shows that the two Native American candidates running in the last Democratic primary received 50% of the vote. Because the Native American vote was split however, a non-Native American won the primary with a plurality of 43%. The proposed District 4 has a slightly higher Native American VAP than the plan adopted in 2001. As Governor Quetawki will testify, Gallup is the commercial center for Zuni Pueblo. Zuni has numerous land holdings and sacred sites in McKinley County. Zuni has shared communities of interest with the Navajo Nation and has worked together with the Navajo Nation on issues concerning sacred sites, water issues, and

[3]Districts 4, 22 and 30 are the multi-tribal districts. District 3 is predominately Navajo, and District 29 is not a Native American majority district and includes only the Pueblo of Isleta, respecting the Pueblo's choice to be in District 29.

Ft. Wingate. Zuni is the largest New Mexico Pueblo. In an exercise of self-determination, the Zuni Council chose to leave three of its precincts in District 4, and move one precinct to District 30.

Senate District 22 is similar to House District 65 in the sense that it incorporates seven Sandoval County Pueblos and the Jicarilla Apache Nation. It also includes Navajo chapters in San Juan County and McKinley County and the To'hajiilee Navajo community. The district was a majority Native American district in 2001 but due to the rapid growth of the non-Native American precincts in Rio Rancho, the non-Hispanic Native American VAP had dropped to 47.4% by 2010. The district follows the same general contours as the existing district although it has dropped some of its precincts in Rio Rancho.

The total Native American VAP of proposed District 22 is 66.3%. A Native American has historically represented District 22 and still does today. Professor Engstrom will testify that this percentage is sufficient to provide Native Americans an opportunity to elect a candidate of their choice.

The Pueblos of Laguna and Acoma have historically been in District 30. The Unified Native American Plan moves one Zuni Pueblo precinct to District 30, at the request of the Zuni Council. The Zuni Pueblo has land in Cibola County, as well as Catron County, and wishes to have influence in both District 30 and District 4, since Mt. Taylor is in District 30. Zuni Pueblo shares many commonalities with the Pueblos of Acoma and Laguna, including traditional ceremonies, dances and songs. There is also significant intermarriage between the Pueblos. As an example, the Governor

of the Pueblo of Laguna has relatives who live in Zuni Pueblo. The three Pueblos are known as the western Pueblos and have been allies on many issues over the centuries. The Pueblos of Laguna and Acoma have significant ties to Grants. Acoma Pueblo is the largest employer in Cibola County, and their children are educated in Grants schools. The changes to the district have made it a more compact district, without changing its core characteristics.

Isleta Pueblo is located in District 29 at their request. Isleta Pueblo has always been in Senate districts with ties to the South Valley and Valencia County. They consider themselves aligned in interest with the rural nature of the communities along the Rio Grande south of Albuquerque. They employ significant numbers of people living in the areas south of the Hard Rock Casino. Isleta Pueblo chose to move into a majority Native American district in the House. They do not want to move into Senate District 30 because they wish to continue having representation at the Legislature that is attuned to the needs of the Rio Grande farming communities. In addition, there is no need to move Isleta Pueblo into the northwest quadrant to increase the Native American voting population for the majority Native American districts, as was the case for the six House majority Native American districts.

V. Influence Districts Are Effective Means of Addressing the Dilution of Minority Voting Strength.

In addition to creating the number of Native American majority Senate districts that is practical, the creation of minority influence districts has also been recognized as a way to address the

dilution of minority voters. *Georgia v. Ashcroft*, 539 U.S. 461, 482 (2003)[4]. An influence district is one in which "minority voters may not be able to elect a candidate of choice but can play a substantial, if not decisive, role in the electoral process." *Id*. Influence districts are expected to result in "representatives sympathetic to the interests of minority voters." *Id*. at 483 (citing *Thornburg v. Gingles*, 478 U.S. 30, 87-89, 90 (1986)). It is, therefore, not sufficient to look only at the minority VAP percentage to determine if a district is, in fact, an influence district, as defined in *Georgia v. Ashcroft*. "In assessing the comparative weight of these influence districts, it is important to consider 'the likelihood that candidates elected without decisive minority support would be willing to take the minority's interests into account.'" *Id*. at 482 (citing *Gingles*, 478 U.S. at 100).

By maintaining a total Native American VAP of 26.8% in District 30, it will be a district in which the Native American voters can cast a decisive vote among those candidates contesting the seat. As Professor Engstrom will testify, a test for evaluating whether a district can be an influence district is if the minorities can be expected to cast a decisive vote, or be expected to cast enough votes, that would constitute at least half of the margin of votes by which a candidate wins. This test is in keeping with the standard set by the United States Supreme Court for influence districts in *Ashcroft*. The review of the electoral history of District 30 demonstrates that the 26.8% Native American VAP in the newly configured district would meet this test. The district is highly

[4]For an broader discussion of influence districts, *see* Richard L. Engstrom, Redistricting: Influence Districts–A Note of Caution and a Better Measure, The Chief Justice Earl Warren Inst. on Law and Social Policy, Research Brief (May 2011), http://www.lawberkeley.edu/files/Influence_Districts.pdf.

competitive. The incumbent won the democratic nomination for this seat by only eight votes. In a three way race, the top two candidates each received 36% of the vote, and the third candidate, a Native American woman, is estimated to have received over 70% of the Native American vote and 27.8% of the overall vote. Multi-Tribal Ex. 23.

Tellingly, to date, the incumbent Senator in District 30 has been unresponsive to the needs of his Native American constituents – a condition *Ashcroft* sees as befitting a remedy such as proposed by the Multi-Tribal plaintiffs. *Id.* at 482. As Lt. Governor Garcia of Acoma Pueblo noted, since his appointment in 2006 and later re-election in 2008, the incumbent Senator has never visited the Pueblo itself, appearing only once in Acoma at the conference room at the Sky City Hotel for the Legislative Redistricting Committee hearing in August, 2011. Test. of Garcia, Trial Tr. 64:12-17, Dec. 15, 2011. The incumbent Senator was a co-sponsor of Senator Rod Adair's legislation to undermine the traditional cultural properties designation of Mt. Taylor on behalf of mining interests. *See* Cultural Property Registration and Acquisition, S.B. 421, 50th Leg., 1st Sess. (N.M. 2011).

Hopefully, the increase of Native American votes in District 30 will encourage all the candidates, and the elected Senator, to be responsive to the diverse communities within District 30 – including the Native American communities.

VI. James and Executive Plans Continue To Split Tribal Communities Asunder.

Like they did in their proposed House Plans, the James and Executive Defendants Plans move tribes in and out of districts against their explicit requests. The James Plan splits the Pueblo of

Laguna and separates most of the Pueblo of Laguna and all of Acoma Pueblo from Mt. Taylor. The Executive Plan moves Laguna Pueblo entirely from District 30.

The James Plan splits Laguna Pueblo by moving four precincts out of District 30, moves the Jicarilla Apache Nation from District 22 to District 4, and moves Isleta Pueblo from District 29 to District 22, all against the expressed wishes of the tribes. The James Plan also packs Native American voters into District 4 (83.2% total Native American VAP) and District 22 (78.9% total Native American VAP), while decreasing the Native American presence in District 30 to 9.0% total Native American VAP.

The Executive map moves Laguna Pueblo from District 30 into District 4 – drawing a political boundary line between Mt. Taylor and the Pueblo. It also splits the Isleta Pueblo's two precincts. One precinct is moved into District 30 - against Isleta Pueblo's wishes and desires to stay in a south valley, Rio Grande farming community Senate district. The Executive Plan places the other Isleta precinct into District 8 which curves around into Torrance County and travels all the way to Las Vegas. As the Isleta Pueblo Governor will testify, they have nothing in common with the northern New Mexico city of Las Vegas.

Acoma Pueblo is also moved into District 4 and a political boundary line is drawn between the Pueblo and Mt. Taylor. The drastic alteration of District 30 in the Executive Plan reduces the non-Hispanic Native American VAP in this district to 13.1%. If the incumbent found it easy to ignore the Native American communities when their VAP was at 20.6%, a further reduction of their

influence, as proposed by both the James and Executive Plans, would lead to a more pronounced disregard for their concerns and interests.

Like the emerging electoral minority community in *LULAC v. Perry*, if adopted, the James Plan would "[make] fruitless the [Laguna] mobilization efforts but also [act] against those [Pueblo members] who were becoming most politically active, *dividing them with a district line* . . ." 578 U.S. at 440 (emphasis added). Like Texas attempted in *LULAC v. Perry*, the James Plaintiffs' map would "undermined the progress of a racial group that has been subject to significant voting-related discrimination and that was becoming increasingly politically active and cohesive." *Id*. at 403.

Dilution of racial minority group voting strength, in our case the protected class of Native Americans, may be caused either by the dispersal of the Native Americans into districts that render the group ineffective to elect a candidate of choice, or by "concentrating" the Native American voters into districts where they "constitute an excessive majority." *Voinovich*, 507 U.S. at 153-154 (quoting *Gingles*, 478 U.S. at 46); *De Grandy,* 512 U.S. at 1007 (citation omitted) (problem is that packing minimizes the minorities "influence in the districts next door"). The James and Executive Plans each dilute Native American voting strength.

The James and Executive maps which split and move the Pueblos around from district to district, also misunderstand the Voting Rights Act. "[A] State may not 'assum[e] from a group of voters' race that they think alike, share the same political interests, and will prefer the same candidates at the polls.'" *LULAC v. Perry*, 548 U.S. at 433 (internal quotation and citation omitted).

In addition, in formulating a redistricting plan to comply with Section 2 of the Voting Rights Act, "a State may not trade off the rights of some members of a racial group against the rights of other members of that group." *Id*. at 437 (citations omitted).

Like they did when drawing their House plans, Governor Martinez and the James Plaintiffs' expert, Rod Adair, never bothered to talk to the impacted tribes about the proposed maps and drastic changes to the contours of the districts. For the impacted tribes, the failure of the state's Governor to consult with them is seen as a blow to the collaborative government to government relationship that should exist between the State and the tribes. The James expert is not under the same obligation as the Governor, but simply believes that he is the best equipped to dictate what is in the best interest of the tribes. The tribal leaders will testify that they are quite concerned about the potential lack of a legislative voice in District 30 that comprises Mt. Taylor, and suspicious of the motivations that led to the drawing of the map in this manner.

The Jicarilla Apache President will testify to his Nation's objections to the James' Plan attempt to move the Jicarilla Apache Nation out of District 22, and into District 4 which would have Gallup at its core. The Jicarilla Apache Nation does not share commonalities with the City of Gallup. It would take members of the Nation over five hours to reach the City of Gallup – which is presently where the incumbent resides. While the James plan moves the Jicarilla Apache Nation into District 4 and Gallup, it moves the Pueblo of Zuni, which does have ties to Gallup into District 22.

VII. The Native Americans' Proposed Senate Plan Follows Traditional Redistricting Principles.

The case of *Shaw v. Reno*, 509 U.S. 630 (1993) and its progeny, teach that majority minority districts must not subordinate to race the traditional redistricting principles of compactness, contiguity, respect for political boundaries, and keeping communities of interest intact. *Miller v. Johnson*, 515 U.S. 900, 919 (1995) (recognizing communities of interest as a traditional redistricting principle in addition to those recognized in *Shaw*). *Shaw* does not stand for the proposition that race-conscious state decision making is impermissible in all circumstances. 509 U.S. at 642. The *Shaw* court noted that the Supreme Court had never issued such a holding. *Id*. *Shaw* held that when a reapportionment scheme is so irrational on its face that it can be understood only as an effort to segregate voters into separate voting districts because of their race, it is subject to a claim under the Equal Protection Clause, will be given strict scrutiny and will require compelling justification. *Id.* at 657-58 (emphasis added). At issue in *Shaw* was the creation of a majority black district which was "approximately 160 miles long and, for much of its length, no wider than the I-85 corridor [and wound] in snakelike fashion through tobacco country, financial centers, and manufacturing areas 'until it gobble[d] in enough enclaves of black neighborhoods.'" *Id*. at 635-36 (citation omitted). The *Shaw* court also noted that traditional redistricting principles, such as compactness, contiguity, and respect for political boundaries "are objective factors that may serve to defeat a claim that a district has been gerrymandered on racial lines." *Id*. at 647.

The Multi-Tribal Plaintiffs will show that their proposed plan for the Senate respects communities of interest as defined by the tribes themselves, is consistent with the redistricting

guidelines adopted by the Legislative Council and similar traditional redistricting criteria, and respects tribal self-determination and political boundaries.

VIII. Conclusion.

For all of the foregoing reasons, the Multi-Tribal Plaintiffs urge the Court to adopt the Unified Native American Plan for the redistricting of the State Senate.

Respectfully submitted this 30th day of December, 2011.

By /s/Teresa Isabel Leger

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2011, a true and correct copy of the foregoing **MULTI-TRIBAL PLAINTIFFS' TRIAL BRIEF FOR REDISTRICTING OF THE NEW MEXICO SENATE** was electronically mailed and electronically filed and served through the court's e-filing system to the Honorable James A. Hall and the counsel listed below.

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