

2012

Supreme Court of Pennsylvania  
Middle District

Filed in Supreme Court

JAN 11 2012

Petition for Review  
Andrew Dominick Alosi

Middle

Vs.

2011 Redistricting Commission

The task of the Pennsylvania Redistricting Commission is arduous and unenviable. In doing so, it is understood that much of what the Commission will see are numbers, data sets, and many maps to say the least. What the Commission may not receive is a first-hand account of how intertwined and related communities are and how representation of a population center within one district is necessary.

The municipalities making up the greater Shippensburg area must be represented by one legislator in the State House of Representatives.

The redistricting completed in 1991 and 2001 left the entire area intact within the same legislative district. Though the border of the 89<sup>th</sup> House district crossed the county line it was a logical decision because it enabled the greater Shippensburg area to be unified. Pennsylvania Law clearly dictates that it be "...absolutely necessary no County, City, incorporated town, Borough, Township or ward shall be divided in forming either a senatorial or representative district." State Law Article 10 Section 16 dictates Legislative districts "shall be composed of compact and contiguous territory as nearly equal in population as practicable." What constitutes "absolutely necessary" that Shippensburg and the Shippensburg area be divided between three separate legislative districts?

The final 2011 redistricting of the greater Shippensburg area takes a unified Shippensburg area and splits it into three parts, two of which are even sub-divided. This increase of municipal divisions displays the propensity by the Commission to further deviate from what is clearly present in state law. Though the Commission is attempting to recognize more County boundaries, The Commission needs to realize those boundaries are not compact or contiguous to the population center of Shippensburg.

In the 2011 final redistricting plan, the greater the Shippensburg area is divided into three separate districts utilizing two cross county divisions and two divisions of municipalities.

All legislative districts are based on a population of 62573 for each of the 203 house seats. One cross County division takes the 86th district (population 61288) which encompasses all of Perry County and crosses the geographical boundary of North Mountain to include the western most parts of Cumberland County. The Commission must be made aware this mountainous ridge does not have any passable roads where travel between the two areas within the district is possible.

Received in Supreme Court

JAN 11 2012

Middle

The 193rd legislative district (population 62846) covers most of northern Adams County and extends over the geographical boundary of South Mountain and into the southwestern point of Cumberland County. Finally, the 89th legislative district (population 64127) will only include the northeastern most municipalities of Franklin County and not extend into Cumberland County.

The division of the Shippensburg area get deeper as the 2011 proposed map is given a closer look. The Borough of Shippensburg will be divided in half. The West Ward will be served by the 89th District. The Middle and East Ward will be served by the 86th District. The Borough Council submitted an exception to this division in a letter to Mr. O'Connor. Southampton Township in Cumberland County will also be divided. Two precincts served by the 193rd district and one precinct by the 86th district. This all is confusing to say the least.

State Law Article 10 Section 16 dictates legislative districts “shall be composed of compact and contiguous territory as nearly equal in population as practicable.” Going on it states, “Unless absolutely necessary, no county, city, incorporated town, borough, township or ward shall be divided in forming either a senatorial or representative district.”

Political power will be diminished. As a voting bloc, the more than 25,000 people that populate the greater Shippensburg area will be divided into thirds. There is no guarantee that any of the three legislators will see it politically necessary to spend the time to fully understand or answer the needs of all constituents in this area. Instead of being a large voting block that would constitute approximately 40 percent of one representative's constituency of the 86<sup>th</sup>, 89<sup>th</sup>, or 193<sup>rd</sup> District, each area would be reduced to approximately 19.8 to 6.7 percent per district. By adopting the 2011 plan, the Commission will immediately dilute the voting power of the Shippensburg area and reduce the chances that its concerns and issues will be addressed by any one of the three representatives.

The Shippensburg area requires one legislator that will bring to the forefront the common needs while still understanding the differences that make each municipality unique. The boundaries determined by the Commission in the 2011 Plan will not be truly representative of the area, hence not giving the citizens of this area equal representation.

Different representatives for the same municipality means the municipality will not be able to have the same kind of influence that would demand attention from a single representative. In the case of Shippensburg, it would now remain on the periphery of each representatives' district and its concerns be safely ignored. The Shippensburg area would only comprise of 19.8 percent of the 86<sup>th</sup> District; 14.8 percent of the 89th District and only 6.7 percent of the 193<sup>rd</sup> District.

In such a scenario, Shippensburg would always take a back seat to the issues concerning the areas of Adams and Perry Counties, and the other areas of Franklin County.

That in turn could lead to citizens being forced to be or not be represented by someone whom they did not have the opportunity to vote for or against. Voters in the Shippensburg East Ward would not have any influence on the actions of the state legislator representing the Shippensburg West Ward. Something that would benefit the entire Shippensburg area

may be voted against by one of its own representatives because it is opposed by people in Adams or Perry Counties.

Provided is a new breakdown of legislative districts in Adams, Cumberland, Franklin, and Perry Counties that can remain representative of the areas they currently represent without major changes. These districts would meet the population requirement of +/- 2.99% and maintain "...compact and contiguous territory as nearly equal in population as practicable..."

There are municipality divisions in my provided breakdown; however these do not occur in population centers. Furthermore, these changes do not bring about major changes in the political make-up of the districts. They are all safely Republican held seats. These districts would maintain the integrity of the Shippensburg area and leave it intact for the next 10 years. If nothing else, please add Shippensburg West ward to the 86th Legislative District as its population total would allow the addition and not go beyond +/-2.99% agreed upon by the Commission. This would ensure the totality and integrity of Shippensburg Borough.

Furthermore, it was not brought to my attention until noon on Wednesday January 11<sup>th</sup>, and in an email sent later on the same day that the 2011 Redistricting Commission lost the copies of the testimony given to them on November 18<sup>th</sup> 2011. A copy was provided to each member of the Commission. The verbal testimony was a portion. Having found this out, it means the Commission did not take into account the full presentment into consideration before adopting the 2011 Final Redistricting Plan.

The United States Constitution guarantees one vote for every citizen. Division of a center of population when keeping that entire center of population within the same legislative district is possible, will decrease the value of that vote.

Respectfully Submitted,



Andrew Alosi  
9 Red Hawk Drive  
Shippensburg, PA 17257  
717-377-1584