

IN THE SUPREME COURT OF ILLINOIS

THOMAS CROSS, in his official)
capacity as Minority Leader of the Illinois House)
and individually as a registered voter, CHRISTINE)
RADOGNO, in her official capacity as Minority Leader)
of the Illinois Senate, JAMES ORLANDO, individually)
as a registered voter, and CHRISTINE DOLGOPOL,)
individually as a registered voter,)

Plaintiffs,) Original Action Under
vs.) Article IV, Section 3(b) of
the Illinois Constitution of
1970

ILLINOIS STATE BOARD OF ELECTIONS,)
RUPERT BORGSMILLER, Executive)
Director of the Illinois State Board of Elections,)
HAROLD BYERS, BRYAN A. SCHNEIDER,)
BETTY J. COFFRIN, ERNEST GOWEN, WILLIAM F.)
MCGUFFAGE, JESSE R. SMART, JUDITH C. RICE,)
and CHARLES W. SCHOLZ, all named in their official)
capacities as members of the Illinois State Board)
of Elections and LISA MADIGAN, in her official)
capacity as Attorney General of the State of Illinois)

Defendants.)

**COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF
REGARDING THE REDISTRICTING PLANS FOR THE ILLINOIS HOUSE OF
REPRESENTATIVES AND THE ILLINOIS SENATE**

NOW COME Plaintiffs, THOMAS CROSS, in his official capacity as Minority
Leader of the Illinois House of Representatives, CHRISTINE RADOGNO, in her official
capacity as Minority Leader of the Illinois Senate, JAMES ORLANDO, and
CHRISTINE DOLGOPOL, (hereinafter "Plaintiffs") by and through the undersigned
counsel, pursuant to Article IV, Section 3(b) of the Illinois Constitution of 1970, and for
their Complaint for Declaratory Judgment and Injunctive Relief, state as follows:

INTRODUCTION

1. This original action challenges the constitutionality of Public Act 097-0006 (hereinafter “Redistricting Plan”), deemed the decennial redistricting plan for the Representative and Legislative districts passed by the Democratic majority in the General Assembly and signed into law by the Democratic Governor Patrick J. Quinn. Plaintiffs allege that the entire redistricting plan codified in Public Act 97-0006 violates the provisions of the Illinois Constitution of 1970 guaranteeing compactness and political fairness. Plaintiffs also allege that several districts, codified in the Redistricting Plan, violate the provisions of the Illinois Constitution of 1970 guaranteeing compactness and political fairness. Because Public Act 097-0006 violates the Illinois Constitution, this Court should invalidate the Act, enjoin the Illinois State Board of Elections from enforcing the Act, and immediately either (1) adopt Plaintiffs’ proposed alternative redistricting map, or alternative maps for specific districts; or (2) appoint a special master to draft a redistricting plan or maps for specific districts in compliance with the Illinois Constitution of 1970.

JURISDICTION AND VENUE

2. The Illinois Constitution of 1970, in Article IV, Section 3(b) provides that this Court “shall have original and exclusive jurisdiction over actions concerning redistricting the House and Senate which shall be initiated in the name of the People of the State of Illinois by the Attorney General.”
3. This action arises out of the Illinois Constitution of 1970 and thus venue is proper in this Court pursuant to Article IV, Section 3 of the Illinois Constitution of 1970.

THE PARTIES

4. Plaintiff THOMAS CROSS is a state representative from the 84th Representative District, a citizen of the United States and of the State of Illinois and a duly registered voter of Kendall County, Illinois. Mr. Cross is also the Minority Leader of the Illinois House of Representatives vested by Article IV, Section 6(c) of the Illinois Constitution of 1970 with the duty to promote and express the views, ideas and principles of the House Minority Republican caucus in the 97th General Assembly and of Republicans in every Legislative and Representative District throughout the State of Illinois.
5. Plaintiff CHRISTINE RADOGNO is a state senator from the 41st Legislative District, a citizen of the United States and of the State of Illinois and a duly registered voter of Cook County, Illinois. Ms. Radogno is also the Minority Leader of the Illinois Senate vested by Article IV, Section 6(c) of the Illinois Constitution of 1970 with the duty to promote and express the views, ideas and principles of the Senate Minority Republican caucus in the 97th General Assembly and of Republicans throughout the State of Illinois.
6. Plaintiff JAMES ORLANDO is a citizen of the United States and of the State of Illinois and a duly registered Republican voter in Cook County within the boundaries of Representative District 35 of the Redistricting Plan.
7. Plaintiff CHRISTINE DOLGOPOL is a citizen of the United States and of the State of Illinois and a duly registered Republican voter in Cook County within the boundaries of Representative District 59 and Legislative District 30 of the Redistricting Plan.

8. Defendant LISA MADIGAN is sued in her official capacity as the Illinois Attorney General. Pursuant to Article IV, Section 3(b) of the Illinois Constitution of 1970, Attorney General MADIGAN is a necessary party to any action regarding the redistricting of Legislative and Representative Districts.
9. Defendant ILLINOIS STATE BOARD OF ELECTIONS, is the entity responsible for overseeing and regulating public elections in Illinois for members of the General Assembly as provided by Article III, Section 5 of the Illinois Constitution of 1970 and 10 ILCS 5/1A-1, *et seq.*
10. Defendant RUPERT BORGSMILLER is the Executive Director of the Illinois State Board of Elections and is sued only in his official capacity as Executive Director of the ILLINOIS STATE BOARD OF ELECTIONS
11. Defendant HAROLD BYERS is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
12. Defendant BRYAN A. SCHNEIDER is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
13. Defendant BETTY J. COFFRIN is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in her official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
14. Defendant ERNEST GOWEN is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.

15. Defendant WILLIAM F. MCGUFFAGE is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
16. Defendant JESSE R. SMART is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
17. Defendant JUDITH C. RICE is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in her official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.
18. Defendant CHARLES W. SCHOLZ is a member of the ILLINOIS STATE BOARD OF ELECTIONS and is sued only in his official capacity as a member of the ILLINOIS STATE BOARD OF ELECTIONS.

FACTS

19. In 2010, the United States Census Bureau conducted its federal decennial census.
20. The Illinois Constitution provides that “in the year following each Federal decennial census year, the General Assembly by law shall redistrict the Legislative and the Representative Districts.” IL CONST., Art. IV, Sec. 3(b).
21. In 2010, the Illinois Senate formed the Senate Redistricting Committee (hereinafter “SRC”) which was composed of 17 state senators: 11 from the Democratic majority and six from the Republican minority.
22. In 2011, the House of Representatives formed the House Redistricting Committee (hereinafter “HRC”) which was composed of 11 state representatives: six from the Democratic majority and five from the Republican minority.

23. From March 28, 2011 to April 30, 2011, the SRC conducted public hearings for the stated purpose of gathering public input for the Redistricting Plan.
24. Over nine days in April, 2011, the HRC conducted public hearings for the stated purpose of gathering public input for the Redistricting plan.
25. At the aforementioned public input hearings before the SRC and HRC, numerous witnesses requested that the respective committees provide the public with at least two weeks to review, analyze and comment on any redistricting plan brought before the committee for a vote.
26. At the aforementioned public input hearings before the SRC and HRC, numerous witnesses requested that the committee provide an explanation for the rationale supporting each district of any proposed plan brought before the committee for a vote, so that the public would have time for review, analysis and comment prior to a committee vote.
27. On May 18, 2011, the SRC disclosed a picture of a map purporting to be a proposed redistricting plan for Legislative Districts, filed as Senate Amendment #1 to Senate Bill 1175.
28. On May 18, 2011, the SRC announced that it would hold a public hearing on Senate Amendment #1 to Senate Bill 1175 scheduled for noon on Saturday, May 21, 2011 in Chicago, IL.
29. On May 19, 2011, in the evening hours, the HRC disclosed a picture of a proposed redistricting plan for Representative districts, filed as House Amendment #1 to House Bill 3670.

30. On May 20, 2011, the HRC announced that it would hold a public hearing on House Amendment #1 to House Bill 3670 scheduled for 2:00 p.m. on Sunday, May 22, 2011 in Chicago, IL.
31. Senate Amendment #1 to Senate Bill 1175 and House Amendment #1 to House Bill 3670 both stated “For purposes of legislative intent, the General Assembly adopts and incorporates herein, as if fully set forth, the provisions of House Resolution 385 of the Ninety-Seventh General Assembly and Senate Resolution 249 of the Ninety-Seventh General Assembly.”
32. Neither House Resolution 385 nor Senate Resolution 249 was filed or made available to the public or the Republican members of the SRC or HRC for review prior to the hearings scheduled for May 21-22, 2011.
33. At the SRC hearing on May 21, 2011, numerous members of the public and of the minority caucus requested more time to review, analyze and comment on Senate Amendment #1 to SB 1175.
34. At the HRC hearing on May 22, 2011, numerous members of the public and the minority caucus requested more time to review, analyze and comment on House Amendment #1 to House Bill 3670.
35. On information and belief, the Democratic members of the Rules Committee of the Illinois House of Representatives convened approximately two hours prior to the May 22, 2011 HRC hearing and approved House Amendment #1 to House Bill 3670 for consideration before the HRC at said hearing.

36. The Democratic members of the Rules Committee did not provide the Republican members of the Rules Committee with notice of the May 22, 2011 Rules Committee hearing.
37. The Democratic members of the HRC and their support staff did not notify the Republican members of the HRC and their support staff or the general public that House Amendment #1 to House Bill 3670 would be considered at the May 22, 2011 hearing or that the sponsor of the bill would be available for questioning.
38. On Tuesday, May 24, 2011, the HRC and SRC convened a joint hearing to consider Senate Amendment #1 to Senate Bill 1175 and House Amendment #1 to House Bill 3670.
39. At the joint hearing on May 24, 2011, the Democratic majority called Dr. Allan Lichtman as a witness on Senate Amendment #1 to Senate Bill 1175 and House Amendment #1 to House Bill 3670.
40. At the joint hearing on May 24, 2011, Dr. Lichtman testified that the Democratic Caucuses in the Illinois House of Representatives and Illinois Senate had retained him to advise Democratic attorneys and staffers about providing African-Americans and Hispanic residents in Illinois with opportunities to elect candidates of their choice in any redistricting plan.
41. Neither the Republican members of the HRC and SRC and their support staff nor the general public were provided with advance notice of Dr. Lichtman's testimony or a copy of his opinions in order to prepare for questioning.
42. At the joint hearing on May 24, 2011, the Democratic Caucuses did not present an expert witness to opine on whether or not Senate Amendment #1 to Senate Bill 1175

or House Amendment #1 to House Bill 3670 met the constitutional requirement that districts be “compact.”

43. At the joint hearing on May 24, 2011, the Democratic Caucuses did not present an expert witness to opine on whether or not Senate Amendment #1 to Senate Bill 1175 or House Amendment #1 to House Bill 3670 met all legal requirements for “political fairness.”
44. On May 25, 2011, the Republican Caucuses of the Illinois Senate and the Illinois House of Representatives unveiled a redistricting plan for the Representative and Legislative Districts, called the Fair Map. An interactive version of the Fair Map was made available to the public for review.
45. The Republican Caucuses proposal was filed on May 26, 2011 as House Amendment #1 to Senate Bill 1177.
46. On May 26, 2011 in the evening hours, state representative Barbara Flynn Currie filed House Amendment #2 to Senate Bill 1177 which purported to be a new redistricting plan for the Legislative and Representative Districts.
47. On May 26, 2011 in the evening hours, the HRC disclosed a picture of a proposed redistricting plan for legislative and representative districts, filed as House Amendment #2 to Senate Bill 1177.
48. House Amendment #2 to Senate Bill 1177 stated “For purposes of legislative intent, the General Assembly adopts and incorporates herein, as if fully set forth, the provisions of House Resolution 385 of the Ninety-Seventh General Assembly and Senate Resolution 249 of the Ninety-Seventh General Assembly.”

49. On May 26, 2011, the Democratic majority voted by a margin of 3-1 to send House Amendment #2 to Senate Bill 1177 to the full Illinois House of Representatives for consideration.
50. House Amendment #2 to Senate Bill 1177 never received a hearing or any public comment before the HRC.
51. On May 27, 2011, approximately two hours before the scheduled session of the Illinois House of Representatives, state representative Barbara Flynn Currie filed House Resolution 385 (HR 385).
52. HR 385 was sent directly to the full Illinois House of Representatives for consideration and never received any public comment or a hearing before the HRC.
53. On May 27, 2011, state representative Roger Eddy filed a motion to discharge the Fair Map from the Rules Committee for consideration.
54. State representative Currie objected to the motion to discharge the Fair Map from the Rules Committee for consideration.
55. The Fair Map never received consideration before the HRC or the Illinois House of Representatives.
56. On May 27, 2011, the Democratic majority in the Illinois House of Representatives passed House Amendment #2 to Senate Bill 1177 by a vote of 64-52.
57. After the passage of House Amendment #2 to Senate Bill 1177, House Resolution 385 was called for a vote before the Illinois House of Representatives and passed by a vote of 64-52.
58. On May 27, 2011 at approximately 2:00 p.m., State Senator Kwame Raoul filed Senate Amendment #1 to Senate Resolution 249.

59. On May 27, 2011 at approximately 3:00 p.m., the Democratic majority in the SRC voted to concur on House Amendment #2 to Senate Bill 1177.
60. After the debate on House Amendment #2 to Senate Bill 1177, the Democratic majority in the SRC voted to adopt Senate Amendment #1 to Senate Resolution 249.
61. On May 27, 2011 at approximately 5:30 p.m., the Democratic majority in the Illinois Senate voted to concur with House Amendment #2 to Senate Bill 1177 by a margin of 35-22.
62. Shortly after passage of the House Amendment #2 to Senate Bill 1177, the Democratic majority adopted Senate Amendment #1 to Senate Resolution 249 by a vote of 35-22.
63. On June 3, 2011, Governor Pat Quinn signed House Amendment #2 to Senate 1177 into law.
64. Public Act 97-0006 became effective on June 3, 2011.

COUNT I (Declaratory Judgment – Redistricting Plan – Compactness)

65. Plaintiffs incorporate as if set forth herein paragraphs 1-64 of this Complaint.
66. The Illinois Constitution of 1970 requires that the districts contained within any redistricting plan pursuant to Article IV, Section 3 must be compact.
67. The Redistricting Plan is less compact than the map of Legislative and Representative Districts for the General Assembly enacted in 2001 and 1991.
68. The Redistricting Plan contains 27 Representative Districts, listed below, that fail to comply with the requirement of the Illinois Constitution of 1970 that Representative Districts must be compact: 1, 5, 6, 8, 10, 12, 15, 18, 20, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 57, 59, 64, 72, 113, and 114. (See Group Exhibit A)

69. The Redistricting Plan contains 14 Legislative Districts, listed below, that fail to comply with the requirement of the Illinois Constitution of 1970 that Legislative Districts must be compact: 1, 2, 3, 10, 11, 12, 13, 15, 16, 17, 29, 30, 36, 40. (Ex. A)
70. The Redistricting Plan fractures a significant amount of counties, municipalities and townships without any neutral justification.
71. There is no neutral justification for the highly irregular, non-compact Representative and Legislative Districts within the Redistricting Plan.
72. The alternative Redistricting Plan (hereinafter “Alternative Plan”) proposed by the Plaintiffs is demonstrably more compact than the Redistricting Plan as well as the redistricting map enacted for the General Assembly in 2001.
73. The systematic and pervasive lack of compactness of the Representative and Legislative Districts burdens Plaintiffs RADOGNO’s and CROSS’ ability to carry out their constitutionally prescribed duty of representing the interests of their caucuses and Republican voters throughout the state of Illinois.
74. The systematic and pervasive lack of compactness of the Representative and Legislative Districts burdens Plaintiffs ORLANDO’s, and DOLGOPOL’s ability to communicate effectively with their elected state representatives and state senators.
75. The systematic and pervasive lack of compactness throughout the Redistricting Plan renders the entire Plan void under the Illinois Constitution of 1970.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that the Redistricting Plan, in its entirety, violates the requirement within the Illinois Constitution of 1970 that Representative and Legislative Districts must be compact, enjoin the Defendant ILLINOIS STATE BOARD OF

ELECTIONS and its members from conducting elections under the Redistricting Plan and adopt the Alternative Plan or appoint a special master to construct a Redistricting Plan that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT II (Declaratory Judgment – Redistricting Plan – Political Fairness)

76. Plaintiffs incorporate as if set forth herein paragraphs 1-75 of this Complaint.
77. Any redistricting plan enacted pursuant to Article IV, Section 3 of the Illinois Constitution of 1970 must meet all legal requirements for political fairness.
78. The bizarre shapes of the Representative and Legislative Districts within the Redistricting Plan were created in furtherance of a deliberate attempt by the Democratic caucuses within the General Assembly to dismantle the ability of Republican voters to elect candidates of their choice to the General Assembly.
79. The Redistricting Plan pits 25 incumbent Republican members of the General Assembly against one another while pitting at most only eight incumbent Democratic members of the General Assembly against one another.
80. In the Redistricting Plan, Democratic incumbents retained on average almost two-thirds of the core constituency of their district from the previous redistricting plan enacted in 2001.
81. In the Redistricting Plan, Republican incumbents retained on average only 55% of the core constituency of their district from the previous redistricting plan enacted in 2001.
82. The Redistricting Plan provides the Democratic Caucuses with 82 Representative Districts in which likely Democratic voters consist of 50% or more of voters.

83. By contrast, the Redistricting Plan only provides the Republican Caucuses with 36 Representative Districts in which likely Republican voters consist of 50% or more of the voters.
84. In more than three-quarters of Representative Districts in which likely Democratic voters constitute a majority, such voters constitute a majority of 55% or more. By contrast, in fewer than half of Representative Districts in which likely Republican voters consist of a majority, such voters constitute a majority of over 55%.
85. In more than two-thirds of Representative Districts in which likely Democratic voters constitute a majority, such voters constitute a “safe” majority of 60% or more. By contrast, in only two Representative Districts in which likely Republican voters constitute a majority, such voters constitute a “safe” majority in excess of 60%.
86. The Democratic Caucuses abused the process by which the Redistricting Plan was created by excluding the Fair Map from any consideration before the General Assembly and deliberately frustrating the public’s and minority caucus’ ability to substantially participate in the creation of the Redistricting Plan.
87. There is no neutral justification for the systematic and pervasive lack of political fairness of the Representative and Legislative Districts within the Redistricting Plan.
88. The Alternative Plan proposed by the Plaintiffs is demonstrably more politically fair and compact than the Redistricting Plan.
89. The failure of the Redistricting Plan to comply with all requirements of political fairness burdens Plaintiffs RADOGNO’s and CROSS’ ability to carry out their constitutionally prescribed duty of representing the interests of their caucuses and Republican voters throughout the state of Illinois.

90. The failure of the Redistricting Plan to comply with all requirements of political fairness burdens Plaintiffs ORLANDO's, and DOLGOPOL's ability to elect Republican state representatives and state senators who will represent them effectively in the General Assembly.

91. The systematic and pervasive lack of political fairness throughout the Redistricting Plan renders the entire Plan void under the Illinois Constitution of 1970.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that the Redistricting Plan, in its entirety, violates the all legal requirements for political fairness within the Illinois Constitution of 1970, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections under the Redistricting Plan and adopt the Alternative Plan or appoint a special master to construct a Redistricting Plan that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT III (Declaratory Judgment – Representative District 35 – Compactness)

92. Plaintiffs incorporate as if set forth herein paragraphs 1-91 of this Complaint.

93. Plaintiff JAMES ORLANDO is a duly registered voter in Cook County, Illinois residing within the boundaries of Representative District 35 of the Redistricting Plan.

94. Representative District 35 fails to comply with the mandate within the Illinois Constitution of 1970 that all Representative Districts must be compact. (See Exhibit B).

95. Representative District 35 is an elongated, tortured shape that stretches 13 miles from the City of Chicago in a westward direction into the suburbs of Cook County.

96. At its narrowest point, Representative District 35 measures only one-half mile in length in the north-south direction.
97. Representative District 35 fractures six different municipalities plus other recognizable communities of interest.
98. The Democratic majority has not advanced a neutral justification for failing to create a Representative District 35 that complies with the constitutional mandate that all Representative Districts be compact.
99. The alternative Representative District 35 proposed by Plaintiffs complies with the constitutional mandate that all Representative Districts be compact.
100. The alternative Representative District 35 proposed by Plaintiffs is substantially equal in population and politically fair and provides adequate representation to minorities and other special interests.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Representative District 35 of the Redistricting Plan violates the requirement within the Illinois Constitution of 1970 that Representative Districts must be compact, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Representative in Representative District 35 in the Redistricting Plan and adopt the Alternative Representative District 35 or appoint a special master to construct an alternative Representative District 35 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT IV (Declaratory Judgment – Representative District 35 – Political Fairness)

101. Plaintiffs incorporate as if set forth herein paragraphs 1-100 of this Complaint.

102. Plaintiff JAMES ORLANDO is a duly registered voter in Cook County, Illinois residing within the boundaries of Representative District 35 of the Redistricting Plan.

103. Representative District 35 fails to comply with the mandate within the Illinois Constitution of 1970 that Representative Districts must meet all legal requirements for political fairness.

104. The Democratic majority created Representative District 35 to dilute the votes of Republicans in a deliberate attempt to enhance the partisan advantage of Democratic candidates for the House of Representatives in the General Assembly in Representative District 35.

105. The alternative Representative District 35 proposed by Plaintiffs complies with the constitutional mandate that all Representative Districts meet all legal requirements for political fairness.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Representative District 35 of the Redistricting Plan violates the requirement within the Illinois Constitution of 1970 that Representative Districts must meet all legal requirements for political fairness, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Representative in Representative District 35 in the Redistricting Plan and adopt the Alternative Representative District 35 or appoint a special master to construct an alternative Representative District 35 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT V (Declaratory Judgment – Representative District 59 – Compactness)

106. Plaintiffs incorporate as if set forth herein paragraphs 1-105 of this Complaint.

107. Plaintiff CHRISTINE DOLGOPOL is a duly registered voter in Cook County, Illinois residing within the boundaries of Representative District 59 of the Redistricting Plan.
 108. Representative District 59 fails to comply with the mandate within the Illinois Constitution of 1970 that all Representative Districts must be compact. (See Exhibit C)
 109. Representative District 59 is bizarrely shaped district stretching 16 miles from the northern edge of Cook County into the southern portion of Lake County.
 110. At its narrowest point, Representative District 59 measures only one-half mile in length in the east-west direction.
 111. Representative District 59 fractures ten different municipalities plus other recognizable communities of interest.
 112. The Democratic majority has not advanced a neutral justification for failing to create a Representative District 59 that complies with the constitutional mandate that all Representative Districts be compact.
 113. The alternative Representative District 59 proposed by Plaintiffs complies with the constitutional mandate that all Representative Districts be compact.
 114. The alternative Representative District 59 proposed by Plaintiffs is substantially equal in population and politically fair and complies with all state and federal law requirements for adequate representation to minorities and other special interests.
- WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Representative District 59 of the Redistricting Plan violates the requirement within the Illinois Constitution of 1970 that Representative

Districts must be compact, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Representative in Representative District 59 in the Redistricting Plan and adopt the Alternative Representative District 59 or appoint a special master to construct an alternative Representative District 59 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT VI (Declaratory Judgment – Representative District 59 – Political Fairness)

115. Plaintiffs incorporate as if set forth herein paragraphs 1-114 of this Complaint.

116. Plaintiff CHRISTINE DOLGOPOL is a duly registered voter in Cook County, Illinois residing within the boundaries of Representative District 59 of the Redistricting Plan.

117. Representative District 59 fails to comply with the mandate within the Illinois Constitution of 1970 that Representative Districts must meet all legal requirements for political fairness.

118. The Democratic majority created Representative District 59 to dilute the votes of Republicans in a deliberate attempt to enhance the partisan advantage of Democratic candidates for the House of Representatives in the General Assembly in Representative District 59.

119. The alternative Representative District 59 proposed by Plaintiffs complies with the constitutional mandate that all Representative Districts meet all legal requirements for political fairness.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Representative District 59 of the Redistricting

Plan violates the requirement within the Illinois Constitution of 1970 that Representative Districts must meet all legal requirements for political fairness, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Representative in Representative District 59 in the Redistricting Plan and adopt the Alternative Representative District 59 or appoint a special master to construct an alternative Representative District 59 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT VII (Declaratory Judgment – Legislative District 30 – Compactness)

120. Plaintiffs incorporate as if set forth herein paragraphs 1-119 of this Complaint.
121. Plaintiff CHRISTINE DOLGOPOL is a duly registered voter in Cook County, Illinois residing within the boundaries of Legislative District 30 of the Redistricting Plan.
122. Legislative District 30 fails to comply with the mandate within the Illinois Constitution of 1970 that all Legislative Districts must be compact. (See Exhibit D)
123. Legislative District 30 is bizarrely shaped, hourglass-like district stretching 20 miles from the northern edge of Cook County into Lake County.
124. At its shortest point, Legislative District 30 measures only one-half mile in length in the east-west direction.
125. Legislative District 30 fractures 12 different municipalities plus other recognizable communities of interest.
126. The Democratic majority has not advanced a neutral justification for failing to create a Legislative District 30 that complies with the constitutional mandate that all Legislative Districts be compact.

127. The alternative Legislative District 30 proposed by Plaintiffs complies with the constitutional mandate that all Legislative Districts be compact.

128. The alternative Legislative District 30 proposed by Plaintiffs is substantially equal in population and politically fair and complies with all state and federal law requirements for adequate representation to minorities and other special interests.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Legislative District 30 of the Redistricting Plan violates the requirement within the Illinois Constitution of 1970 that Legislative Districts must be compact, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Senator in Legislative District 30 in the Redistricting Plan and adopt the Alternative Legislative District 30 or appoint a special master to construct an alternative Legislative District 30 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.

COUNT VIII (Declaratory Judgment – Legislative District 30 – Political Fairness)

129. Plaintiffs incorporate as if set forth herein paragraphs 1-128 of this Complaint.

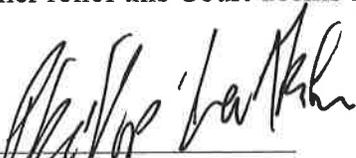
130. Plaintiff CHRISTINE DOLGOPOL is a duly registered voter in Cook County, Illinois residing within the boundaries of Legislative District 30 of the Redistricting Plan.

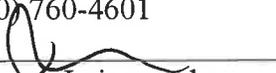
131. Legislative District 30 fails to comply with the mandate within the Illinois Constitution of 1970 that Legislative Districts must meet all legal requirements for political fairness.

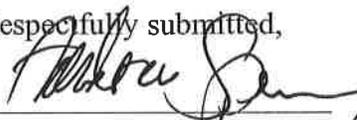
132. The Democratic majority created Legislative District 30 to dilute the votes of Republicans in a deliberate attempt to enhance the partisan advantage of Democratic candidates for the Senate in the General Assembly in Legislative District 30.

133. The alternative Legislative District 30 proposed by Plaintiffs complies with the constitutional mandate that all Legislative Districts meet all legal requirements for political fairness.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter declaratory judgment order finding that Legislative District 30 of the Redistricting Plan violates the requirement within the Illinois Constitution of 1970 that Legislative Districts must meet all legal requirements for political fairness, enjoin the Defendant ILLINOIS STATE BOARD OF ELECTIONS and its members from conducting elections for state Senator in Legislative District 30 in the Redistricting Plan and adopt the Alternative Legislative District 30 or appoint a special master to construct an alternative Legislative District 30 that complies with the mandates of the Illinois Constitution of 1970 or for any other relief this Court deems appropriate.


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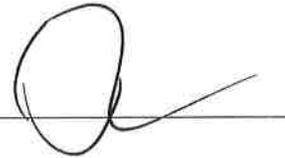

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Respectfully submitted,

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VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

By One of the Attorneys _____



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SUBSCRIBED and SWORN to before me
this 8 th day of February, 2012

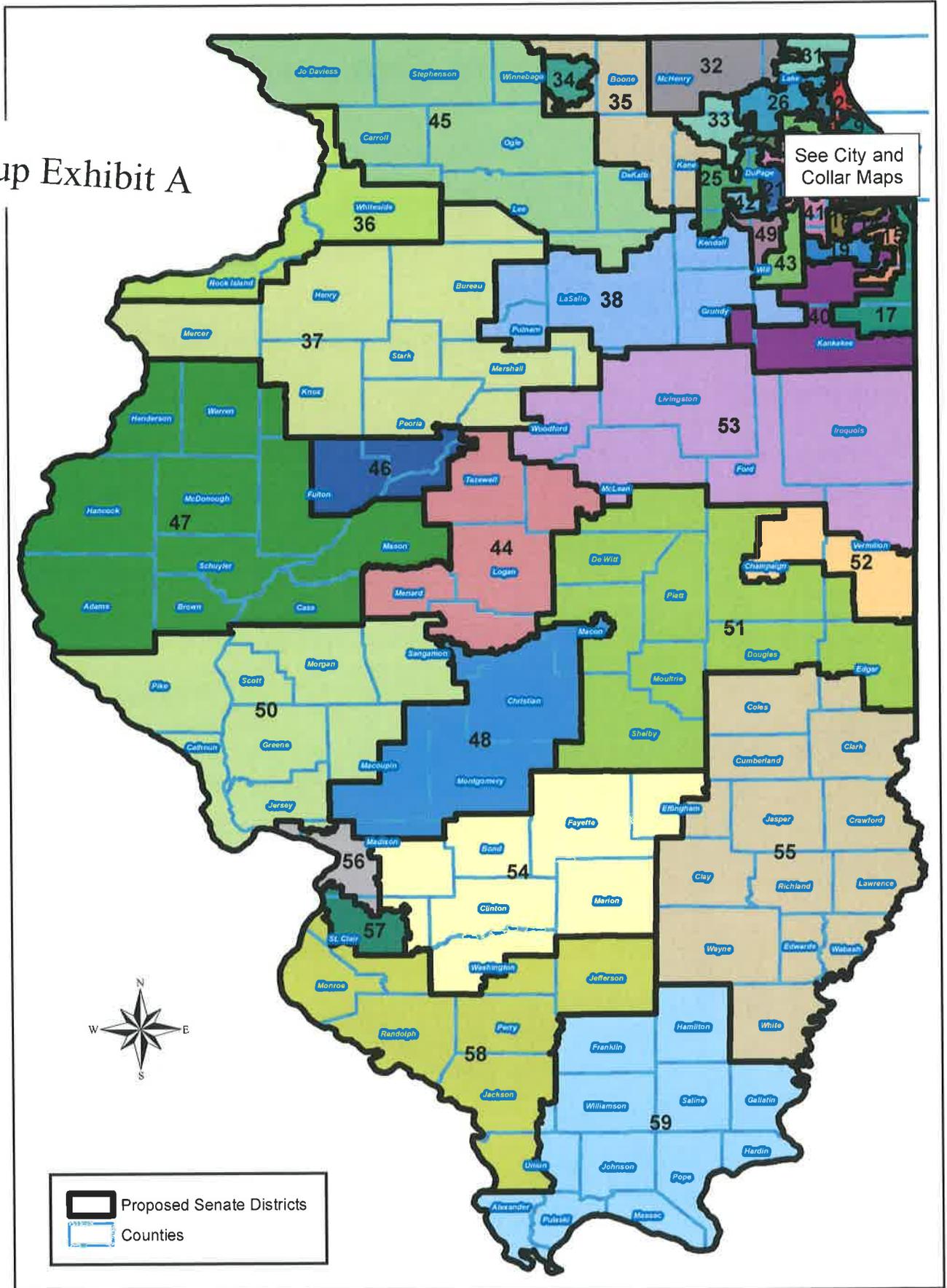


NOTARY PUBLIC



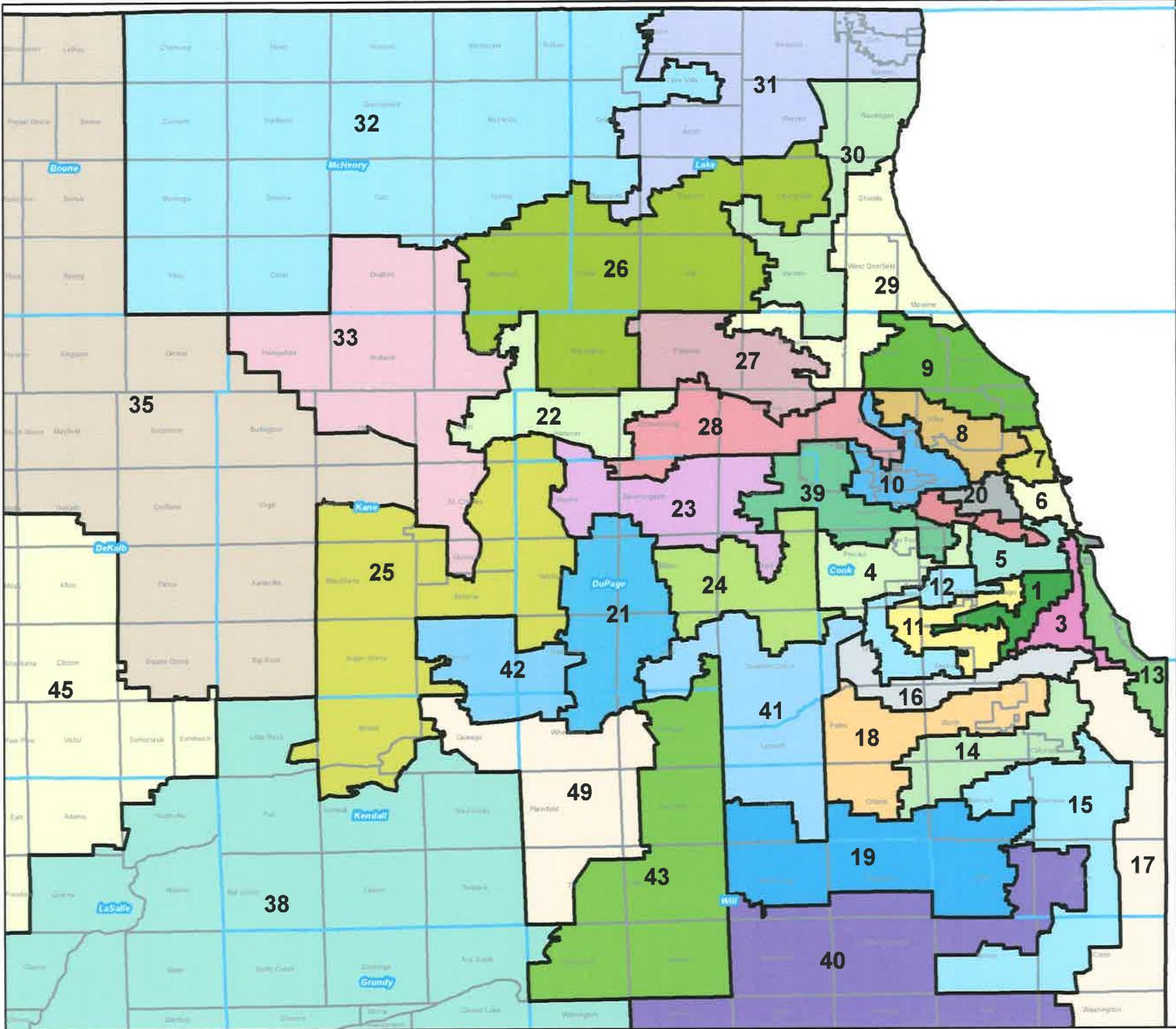
Legislative Districts (P.A. 97-0006)

Group Exhibit A



Legislative Districts (P.A. 97-0006)

Cook and Collar Counties



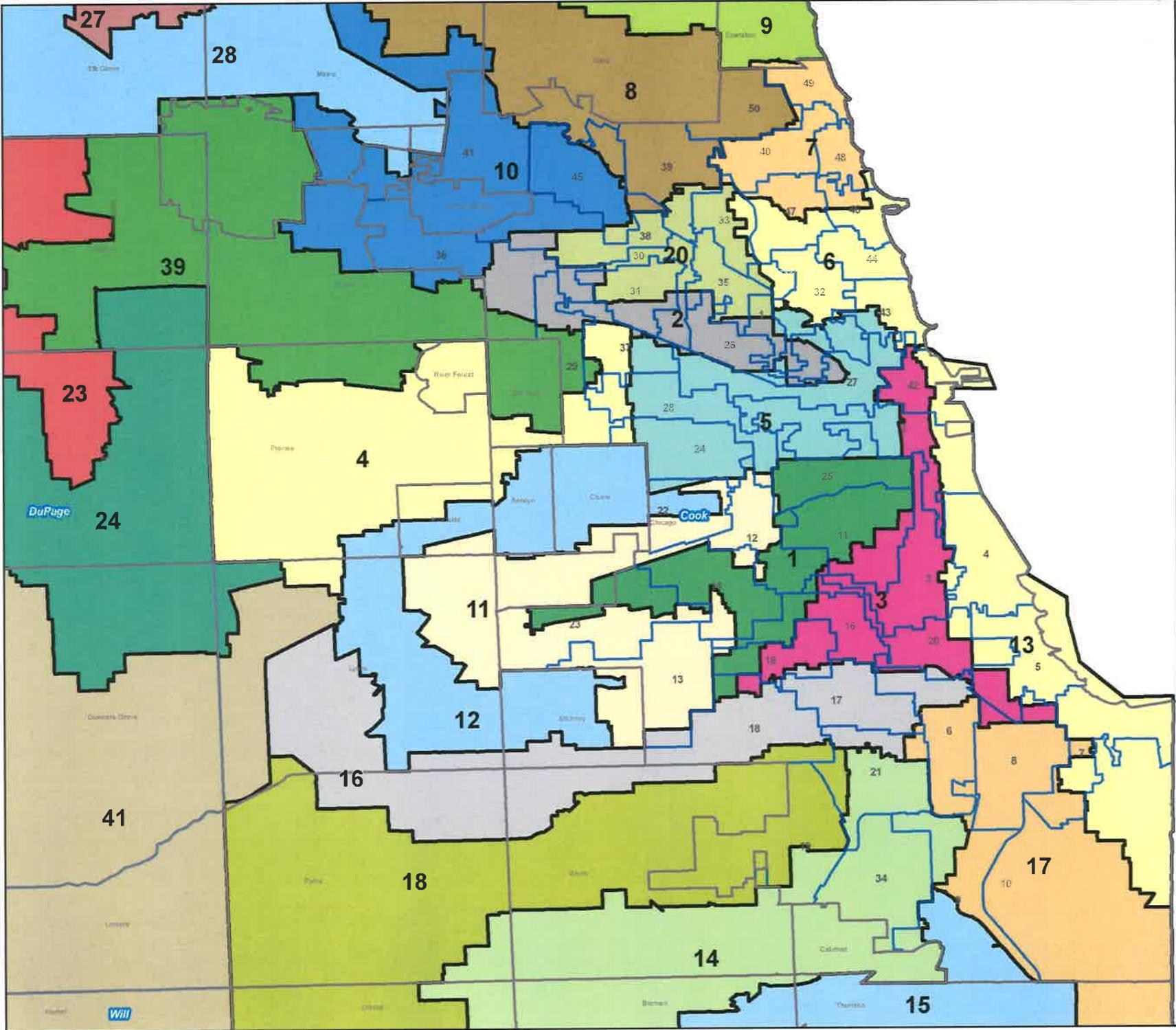
Legend:

- Proposed Senate Districts
- Counties
- Townships

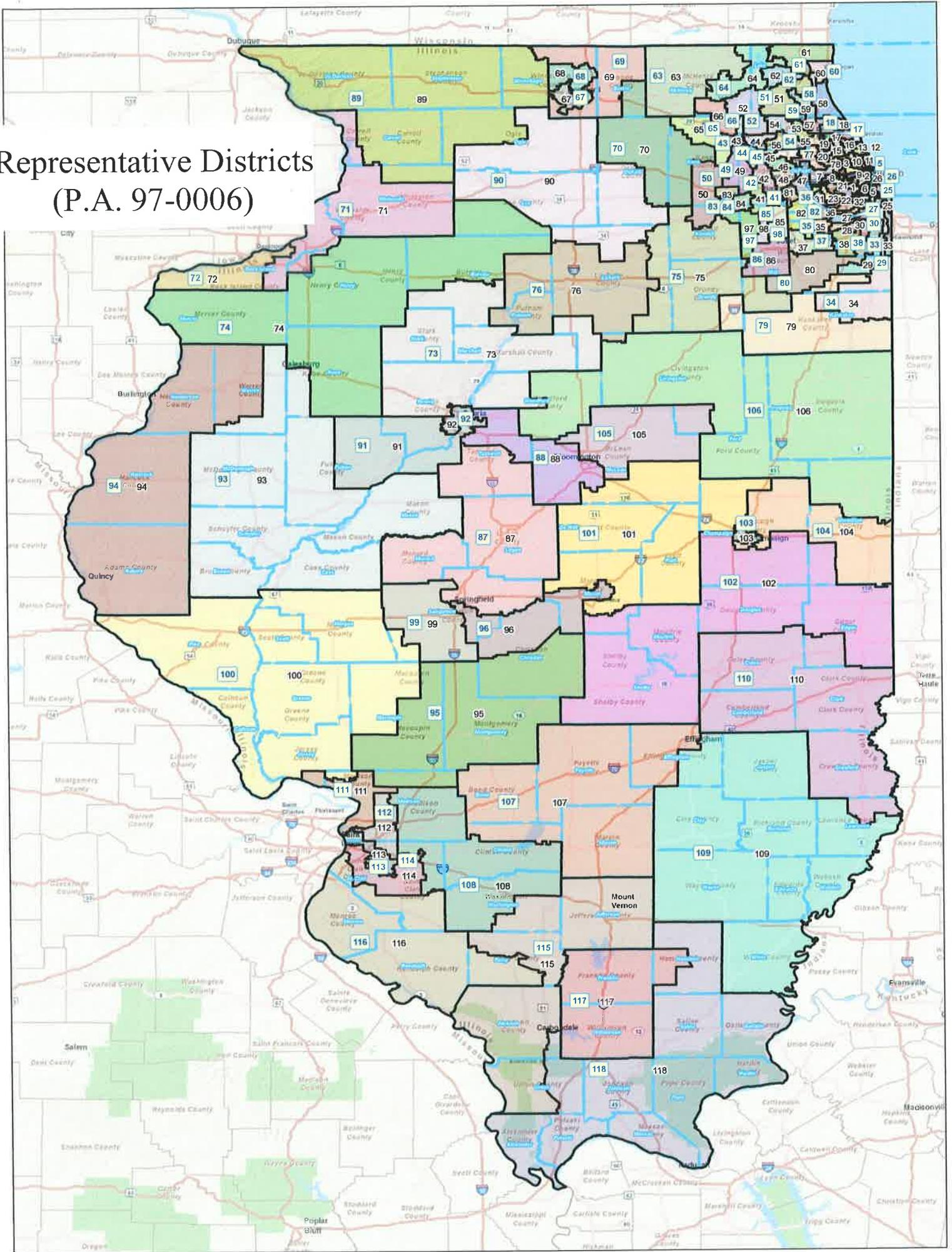


Legislative Districts (P.A. 97-0006)

City of Chicago



Representative Districts (P.A. 97-0006)



**Northeastern
Illinois
Representative
Districts
(P.A. 97-0006)**

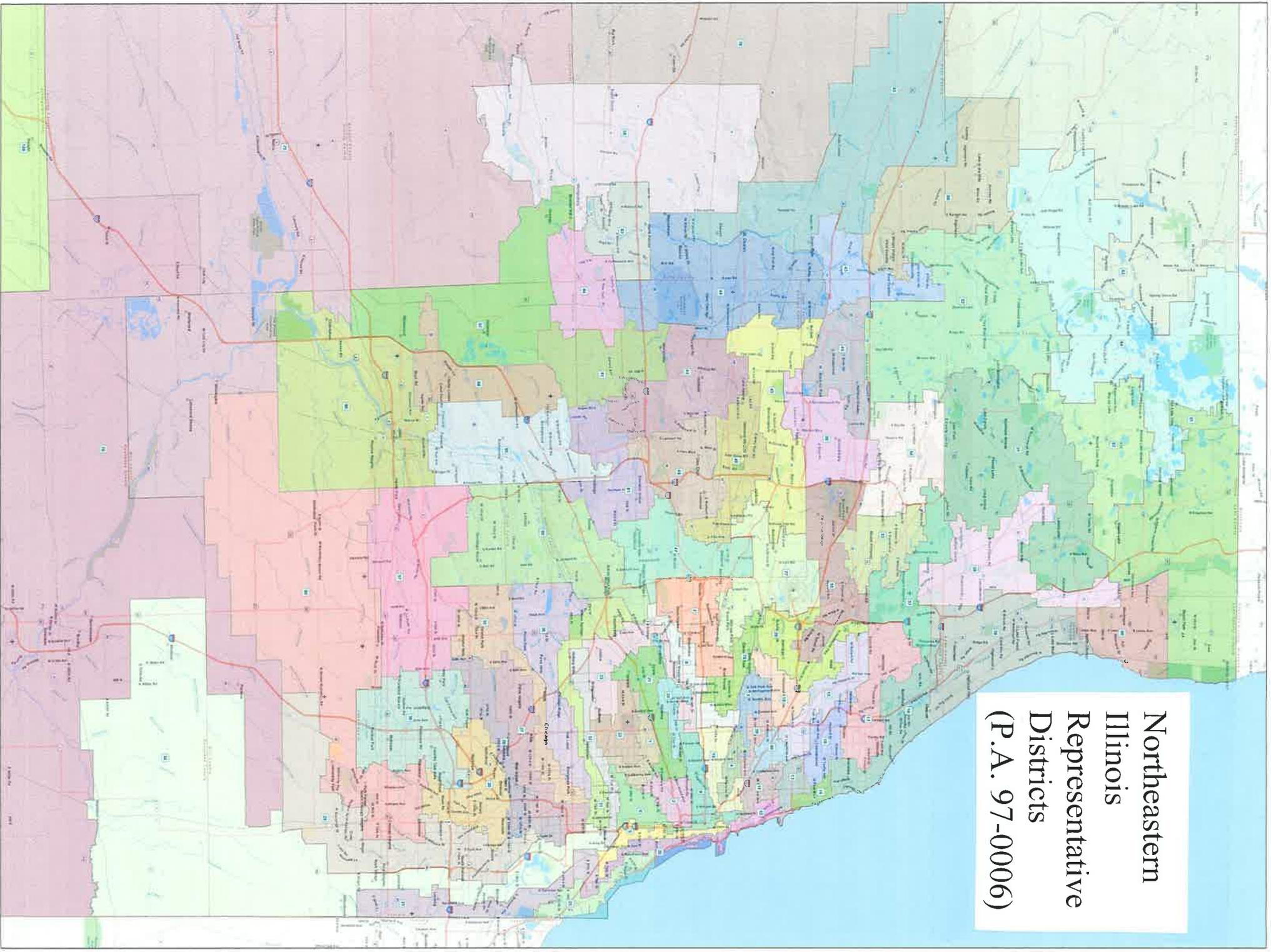
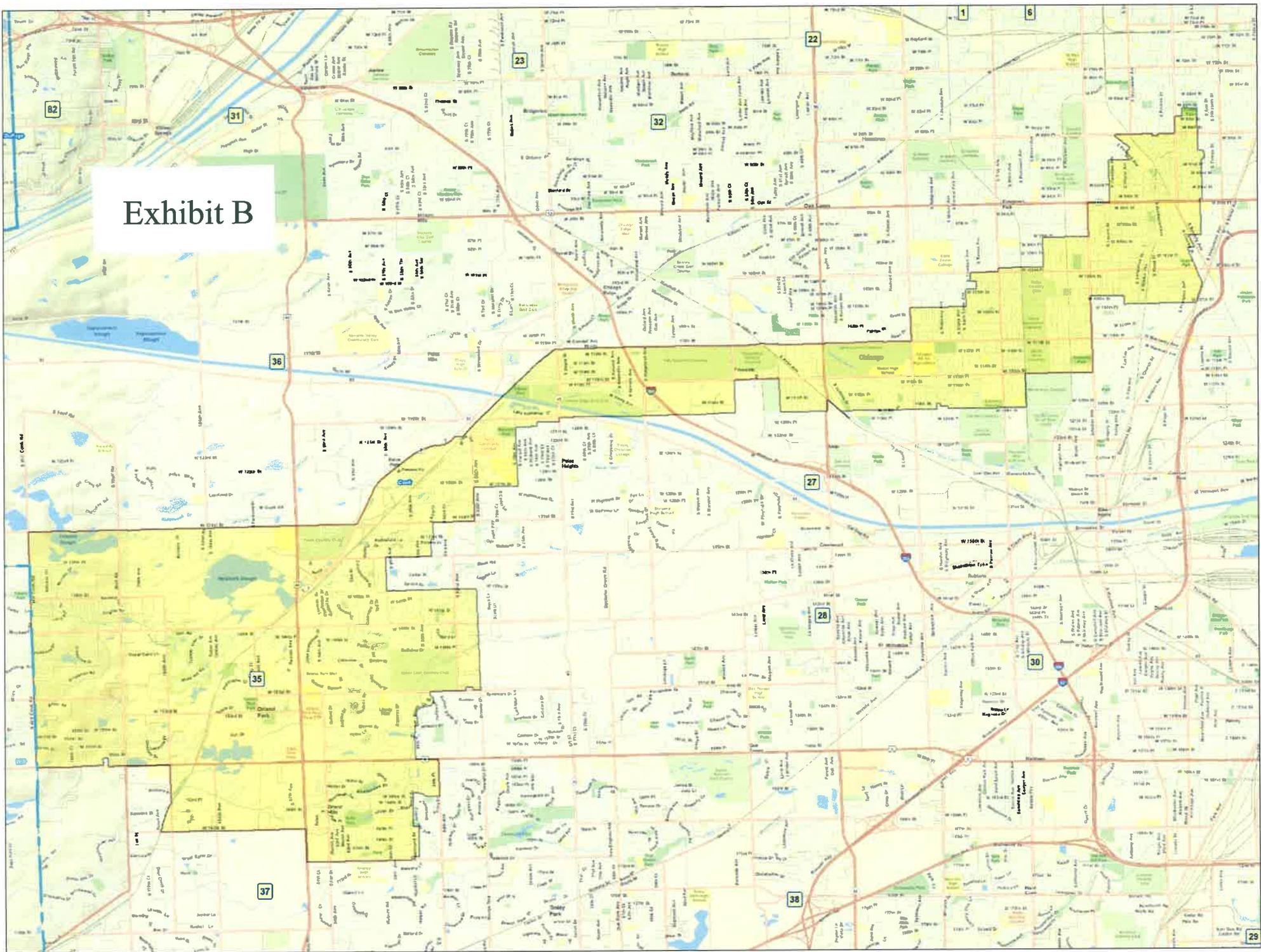


Exhibit B



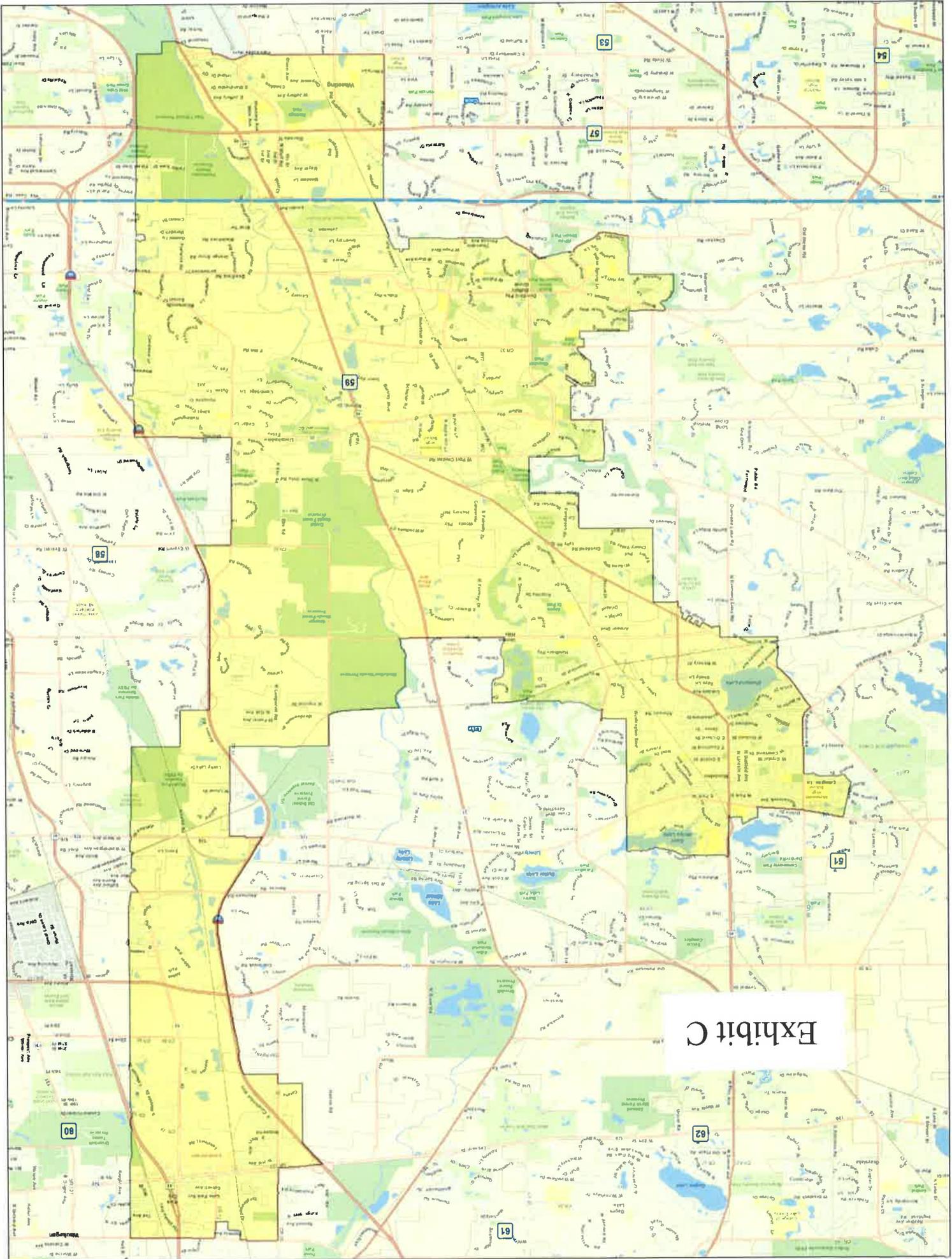


Exhibit C

Exhibit D

