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Attorney for Petitioners

Co-Counsel also representing their respective counties *(Addresses attached)
Douglas Payne, Benewah County Prosecutor
Louis E. Marshall, Bonner County Prosecutor
Jack Douglas, Boundary County Prosecutor
E. Clayne Tyler, Clearwater County Prosecutor
Kirk MacGregor, Idaho County Prosecutor
Kimron Torgerson, Lewis County Prosecutor
Val Siegel, Shoshone County Prosecutor

IN THE SUPREME COURT OF THE STATE OF IDAHO

BENEWAH COUNTY, a political subdivision of the State of Idaho, and the **BOARD OF BENEWAH COUNTY COMMISSIONERS**; **BONNER COUNTY,** a political subdivision of the State of Idaho, and the **BOARD OF COMMISSIONERS OF BONNER COUNTY**, a political subdivision of the State of Idaho; **BOUNDARY COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF BOUNDARY COUNTY; CLEARWATER COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF CLEARWATER COMMISSIONERS**; **IDAHO COUNTY,** a political subdivision of the State if Idaho, and the **BOARD OF IDAHO COUNTY**	)	CASE NO. **PETITION CHALLENGING LEGISLATIVE REDISTRICTING APPLICATION FOR INJUNCTIVE RELIEF, AND APPLICATION FOR WRIT OF PROHIBITION**

COMMISSIONERS; LEWIS COUNTY, a political subdivision of the State of Idaho, and the **BOARD OF LEWIS COUNTY COMMISSIONERS; SHOSHONE COUNTY,** a political subdivision of the State of Idaho, and the **BOARD OF SHOSHONE COUNTY COMMISSIONERS;** and **IDAHO CITIZENS FOR EQUITABLE REDISTRICTING,** an Idaho nonprofit Association,

Petitioners,

vs.

IDAHO COMMISSION ON REDISTRICTING and **BEN YSURSA,** Secretary of State of the State of Idaho

Respondents.

COME NOW the Petitioners, Benewah County, the Board of Benewah County Commissioners, Bonner County, the Board of Bonner County Commissioners, Boundary County, the Board of Boundary County Commissioners, Clearwater County, the Board of Clearwater County Commissioners, Idaho County, the Board of Idaho County Commissioners, Lewis County, the Board of Lewis County Commissioners, Shoshone County, the Board of Shoshone County Commissioners, and Citizens for Equitable Redistricting, and submit the following Petitioner Challenging the 2011 Legislative Redistricting Plan, and applying for injunctive relief and a Writ of Prohibition against the Respondents, and in support of their Petition, state as follows:

JURISDICTION

1. The Idaho Supreme Court has original jurisdiction over this matter pursuant to Article III, §2 (5), of the Idaho Constitution. Idaho Appellate Rule 5 authorizes any person to

apply to the Supreme Court for the issuance of any extraordinary writ or other proceeding over which the Supreme Court has original jurisdiction.

PETITIONERS

2. Petitioner Counties are all political subdivisions of the State of Idaho.

3. Petitioners Board of Benewah County Commissioners, Board of Bonner County Commissioners, Board of Boundary County Commissioners, Board of Clearwater County Commissioners, Board of Idaho County Commissioners, Board of Lewis County Commissioners, and Board of Shoshone County Commissioners are the governing boards of their respective counties, have the statutory authority under Idaho Code § 31-813 to bring this action on behalf of their counties, are each political subdivisions, and file this action based on the best interests of the citizens of their counties.

4. Petitioner Idaho Citizens for Equitable Redistricting is an Idaho nonprofit Association, whose members include Idaho citizens whose right to participate in the political process, voting rights and right to equal protection under the United States and Idaho Constitutions have been adversely impacted by the formation of Legislative Districts in Plan L87 that disenfranchise large segments of Idaho citizens, brings this action on behalf of its members.

RESPONDENTS

5. Respondent Idaho Redistricting Commission (hereinafter the "Redistricting Commission" or "Respondent") is a state commission charged with the redistricting of state and federal legislative districts pursuant to Article III, §2 of the Idaho Constitution and Chapter 15 of Title 72 of the Idaho Code.

6. Respondent Ben Ysursa is the Secretary of State for the State of Idaho and has statutory responsibilities regarding the conduct of elections throughout the State of Idaho. Respondent Ysursa is required by Idaho Code §72-1508 to transmit a copy of the final report of the Commission on Redistricting to the president of the Senate and the Speaker of the House of Representative of the Idaho Legislature, to be spread upon the journals.

REDISTRICTING

7. The statutory requirements governing the activities of the Redistricting Commission are set forth in Idaho Code §§72-1501 *et seq*.

8. On October 14, 2011, the Redistricting Commission filed with the office of the Secretary of State a final plan regarding the redistricting of the state legislative districts in Idaho. The state legislative plan adopted by the Redistricting Commission is known as Legislative Plan "L87" (hereinafter referred to as "Plan L87"). This act of filing Plan L87 with the Secretary of State was the last act of the Redistricting Commission and made the decision of the Commission to adopt Plan L87 final.

9. A map of Plan L87, which was adopted by the Redistricting Commission, is attached hereto as "Exhibit A" and is intended to be incorporated herein as if set forth in full. Plan L87 divides the following eleven (11) counties and combines them with other counties: Bonner, Kootenai, Gem, Canyon, Owyhee, Twin Falls, Bannock, Bingham, Bonneville, Teton and Fremont. Plan L87 also combines Idaho and Clearwater Counties with Shoshone County although there is no direct road connection between Shoshone County and Idaho and Clearwater Counties.

10. A statistical analysis of Plan L87 shows the district deviation and apportionment within Plan L87, which was produced by the Redistricting Commission, and is attached hereto as "Exhibit B" and is intended to be incorporated herein as if set forth in full.[1]

11. Twin Falls County, Teton County, Owyhee County and Kootenai County, together with their respective Boards of Commissioners, and the Cities of Twin Falls, Filer, Buhl and Hansen, have filed a proposed map in pending Idaho Supreme Court Case No. 39373, hereinafter "Twin Falls case Petitioners". The Petitioners herein object to the Twin Falls case Petitioners' plan with respect to its treatment of counties north of the Valley/Idaho County line.

12. The Petitioners herein join with the Twin Falls case Petitioners with respect to their challenge to Plan L87 on all grounds asserted therein.

13. Petitioners propose that the Court should adopt Plan L82 with respect to Idaho, Clearwater, Shoshone, Lewis, Nez Perce, Latah, Benewah, Kootenai, Bonner and Boundary Counties because that plan complies with the Idaho Constitution and Idaho statutes in preserving communities of interest and avoiding disenfranchisement of Idaho citizens.

14. A statistical analysis of the legislative districts for Plan L82 is attached hereto as "Exhibit C" and is intended to be incorporated herein as if set forth in full.

15. In the event that this Court determines that the sole applicable criteria for determining the constitutionality of a legislative reapportionment plan is its compliance with Article III, §5 of the Idaho Constitution, and that compliance with the statutory guidelines in Idaho Code §72-1506 is not required for the protection of fundamental constitutional rights

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1 Plan L87 and all plans proposed to the Redistricting Commission and analyzed by the Redistricting Commission are available in detail on the Idaho Committee for Reapportionment (Redistricting Commission) website:

guaranteed by the United States Constitution, then the Court should adopt Plan L76, which is the only legislative reapportionment plan that has the least number of county splits and trans-county districts. Plan L76 has only five (5) county splits as opposed to eleven (11) in Plan L87, and has seven (7) trans-county districts, as opposed to twelve (12) in Plan L87.

16. A statistical analysis of the legislative districts for Plan L76 is attached hereto as "Exhibit D" and is intended to be incorporated herein as if set forth in full.

17. Idaho law sets the number of legislative districts at 35. The total population of the state of Idaho based on the Year 2010 United States Census is 1,567,582 people. Therefore, the ideal district population is 44,788 people per district.

18. Petitioners join with the Twin Falls case Petitioners in the factual claims alleged in their Petition at Paragraphs 16-26, establishing the deficiencies of Plan L87 and its noncompliance with the requirements of the Idaho Constitution and statutes.

The Effect of Plan L87: North Idaho Counties

19. Plan L87 combines Shoshone County with Idaho and Clearwater Counties although there is no direct road connection between all three counties. In order to travel from Clearwater County to Shoshone County, a person must leave the district and the trip can take more than seven hours one-way to complete. Shoshone County does not have a community of interest with Idaho and Clearwater counties and depending upon where its elected representatives reside, one or more of these counties could not be effectively represented under this plan.

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http://www.legislature.idaho.gov/redistricting/maptitude.htm, in the "maptitude" format.

20. Under Plan L87 and the Twin Falls Case Petitioners' plan, Benewah County is dominated by the city of Moscow, while Plan L82 links Shoshone County with Benewah county and the rural part of Kootenai and rural part of Latah County, preserving these rural communities of interest and not violating the road rule of Idaho Code §72-1506.

21. Under Plan L87 and the Twin Falls Case Petitioners' plan, Lewis County is dominated by the city of Lewiston, while Plan L82 combines Lewis County with the rural part of Nez Perce, and all of Clearwater and Idaho Counties, thus preserving a community of interest in these predominantly rural communities. Additionally, the vast majority of the Nez Perce Indian Reservation is kept wholly intact.

22. Although Bonner County is split under all of the proposed plans, and Boundary Counties is not split under any of the proposed plans, both of the these counties are adversely impacted by the adoption of Plan L87. There is a substantial difference in the population deviations between the northern districts under Plan L87, Plan L82, and the plan proposed by the Twin Falls case Petitioners. Plan L87 has a deviation of 8.00% in Districts 1-7. The Twin Falls Case Petitioners' Plan has a deviation of 8.30% in Districts 1-7. Plan L82 has a deviation of only 4.23% in Districts 1-7. In addition, Plan L87 and the Twin Falls Case Petitioners' plan for Districts 1-7 do not preserve communities of interest and effectively disenfranchise a large number of north Idaho citizens, impacting the representation of all north Idaho communities in our state legislature.

23. Plan L82 has less population deviation statewide than Plan L87, 8.76% vs. 9.92%. It has less population deviation within North Idaho Districts 1-7, 4.23% vs. 8.00%. Plan

L82 does not have any precinct splits, while Plan L87 splits 83 precincts. Plan L82 does not have any road violations, while Plan L87 has at least five (5) road violations. L82 preserves traditional neighborhoods and communities of interest in Benewah, Clearwater, Idaho, Latah, Lewis, Nez Perce, and Shoshone Counties that are all adversely affected by Plan L87.

24. This Court has not clarified the interplay between the requirement of the Idaho Constitution, Article III, §5 to minimize county splits with the statutory guidelines enacted in Idaho Code §72-1506, including both the road requirement and the requirement for preservation of communities of interest. Article III, §5 states in pertinent part that:

> "...a county may be divided in creating districts only to the extent it is reasonably determined by statute that counties must be divided to create senatorial and representative districts which comply with the constitution of the United States."

The statutory requirements of Idaho Code §72-1506 are framed to protect the rights guaranteed to Idaho citizens under the United States Constitution. Moreover, in the present case, Plan L87 disenfranchises large segments of north Idaho voters by dividing rural communities (rural Benewah and Lewis Counties) and tying them into dominant urban communities (Moscow and Lewiston) and linking disparate and unconnected communities together in a single district (Shoshone, Idaho and Clearwater Counties). A different configuration of these districts is required to protect the constitutional rights of these citizens, to equal protection, and to their right to participate meaningfully in the political process. Plan L87 gerrymanders districts that disenfranchise these citizens.

25. Because preservation of communities of interest implicates rights guaranteed under the United States Constitution, including the right of Idaho citizens to participate

meaningfully in the political process and the right to equal protection under the laws, Plan L82 that complies with the requirements of both the Idaho Constitution and Idaho statutes should be adopted by this Court.

FIRST CAUSE OF ACTION
VIOLATION OF IDAHO CODE §72-1506

26. Each and every fact and allegation set forth in paragraphs 1 through 25 above are incorporated within the First Cause of Action as if set forth in full.

27. Idaho Code §72-1506 requires that:

> (2) To the maximum extent possible, districts shall preserve traditional neighborhoods and local communities of interest.
>
> (3) Districts shall be substantially equal in population and should seek to comply with all applicable federal standards and statutes.
>
> (4) To the maximum extent possible, the plan should avoid drawing districts that are oddly shaped.
>
> (5) Divisions of counties *shall* be avoided whenever possible. In the event that a county must be divided, the number of such divisions, per county, should be kept to a minimum. (Emphasis added.)
>
> (9) When a legislative district contains more than one (1) county or a portion of a county, the counties or portion of a county in the district shall be directly connected by roads and highways which are designated as part of the interstate highway system, the United States highway system or the state highway system. When the commission determines, by an affirmative vote of at least five (5) members recorded in its minutes, that it cannot complete its duties for a legislative district by fully complying with the provisions of this subsection, this subsection shall not apply to the commission or legislative redistricting plan it shall adopt.

28. The statutory language, as amended in 2009, is mandatory language.

29. Plan L87 violates each of the above statutory provisions as follows:

a. Plan L87 violates subsection (5) because it divides Owyhee County, Fremont County, Gem County and Teton County to an extent which is not reasonably necessary to meet the requirements of the equal population principle. Furthermore, Plan L87 does not keep division of the counties to a minimum. In Plan L87, three counties that needed to be divided were divided again for no legitimate reason: Twin Falls County, Canyon County, and Kootenai County.

30. The equal population principle could have been accomplished by:

a) Keeping Kootenai County whole and dividing it into 3 districts within its own borders.

b) Keeping Gem County whole by not severing its southwestern corner (1,466 residents) from the rest of the county.

c) Avoiding the truncation of Fremont County by placing the whole county with its western neighbors.

d) Splitting Teton County in a rational way, instead of scattering its precincts all over eastern Idaho.

31. Failure to abide by the requirements of Idaho Code §72-1506(5) establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

32. By dividing the counties in the manner set forth in Plan L87, traditional neighborhoods and local communities of interest have been destroyed in violation of Idaho Code §72-1506(2) as follows:

a) The citizens from the northern part of Kootenai County in District 3 are disconnected from the county economic base which is centralized in the Coeur d'Alene, Post Falls, Rathdrum, and Hayden area. In the 7th District, 5,155 Kootenai County citizens are artificially connected to citizens in Shoshone, Clearwater, and Idaho Counties. There is no direct economic connection between Kootenai County and the citizens in this widely scattered, rural, and lightly populated district.

b) The citizens of Shoshone County are connected with Idaho and Clearwater Counties even though they have no communities of interest in common.

33. Failure to abide by the requirements of Idaho Code §72-1506(2) establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

34. Plan L87 violates Idaho Code §72-1506(3) requirement that, "districts shall be substantially equal in population and should seek to comply with all applicable federal standards and statutes," as follows:

a) Plan L87 does not create districts which are substantially equal in population and it does not comply with applicable federal standards and statutes. Districts 1 through 7 deviate from the ideal district size by an average of 3.61%. Plan L82 has an average deviation from ideal district size in Districts 1 through 7 of 1.61%. Plan L87's total range of deviation in Districts 1 through 7 is 8.00%, with a high of 3.89% and low of -4.11%. Plan L82's total range of deviation is 4.23%, with a high of 3.30% and low of -0.93%.

b) Statewide, Plan L87 barely avoided a 10% deviation, with total range of deviation at 9.92%.

c) Plan L87 splits 83 precincts statewide, and 12 precincts in Districts 1 through 7. Even with this large number of split precincts, Plan L87 still only barely avoided a 10% deviation. The only apparent purpose of these precinct splits was to gerrymander the affected Districts in violation of Idaho Code §72-1506(8).

35. The equal protection clause of the Fourteenth Amended to the United States Constitution requires that legislative districts be substantially equal in population.

36. The Fourteenth Amendment to the United States Constitution requires substantially equal state legislative representation for all citizens of all places.

37. By nearly reaching an overall deviation of 10.0%, Plan L87 is discriminatory under the equal protection clause of the Fourteenth Amendment. Specifically, citizens in Districts 1 through 7, and other Districts in the state are discriminated against in that those counties are divided in such a way that those citizens in the parts that are carved away and arbitrarily combined with other counties will have little influence as a cohesive electorate.

38. Failure to abide by the requirements of Idaho Code §72-1506(3) establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

39. Idaho Code §72-1506(4) requires that, "to the maximum extent possible, the plan should avoid drawing districts that are oddly shaped."

40. Plan L87 creates districts which are oddly shaped.

41. District 7 is oddly shaped because it connects Shoshone County with Clearwater and Idaho Counties, creating a district that has no interior connecting roads between Shoshone County and the other Counties. It extends from Wallace in Shoshone County to Riggins in Idaho County, a driving distance of approximately 260 miles, and touches the Idaho borders with both Oregon and Montana. (See Exhibit "A")

District 35 is extremely oddly shaped, extending from Custer County, the middle of the state, to Fremont County at the Montana/Wyoming border, with nearly an hourglass shape.

Bonneville County is divided in such a way that District 33 is an island, entirely engulfed by District 30.

42. Plan L87 violates Idaho Code §72-1506(4) by creating districts which are oddly shaped.

43. Failure to abide by the requirements of Idaho Code §72-1506(4) establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

44. Idaho Code §72-1506(9) requires legislative districts containing more than one county or portion of a county to be directly connected by roads and highways, unless that requirement is waived by the commission because it cannot otherwise adopt a plan.

45. Plan L87 violates §72-1506(9) because even though the commission this road requirement, it was not factually necessary to do so in order to formulate a legislative redistricting plan that complied with Idaho law.

46. Plan L82 does not have any road violations, while Plan L87 has at least five (5) road violations.

47. Failure to abide by the requirements of Idaho Code §72-1506(9) establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

SECOND CAUSE OF ACTION
VIOLATION OF IDAHO CONSTITUTION ARTICLE III §5

48. Each and every fact and allegation set forth in paragraphs 1 through 47 above are incorporated within the Second Cause of Action as if set forth in full.

49. Article III §5 of the Idaho Constitution states:

> A senatorial or representative district, when more than one county shall constitute the same, shall be composed of contiguous counties, *and a county may be divided in creating districts only to the extent it is reasonably determined by statute that counties must be divided to create senatorial and representative districts which comply with the constitution of the United States. A county may be divided into more than one legislative district when districts are wholly contained within a single county.* No floterial district shall be created. Multi-member districts may be created in any district composed of more than one county only to the extent that two representatives may be elected from a district from which one senator is elected. The provisions of this section shall apply to any apportionment adopted following the 1990 decennial census. (Emphasis added.)

50. In clear violation of this constitutional provision, the Reapportionment Commission unnecessarily divided Twin Falls County, Fremont County, Gem County, Owyhee County, Canyon County, Bingham County, and Kootenai County into a multiple number of districts. While it is correct that Twin Falls County, Canyon County, and Kootenai County each need to be divided into more than one district, the Redistricting Commission is not justified in dividing Twin Falls County and Canyon County each into three districts and Kootenai County

into four districts. Likewise, Gem County, Bingham County, Fremont County, and Owyhee County were unnecessarily split into two districts.

Plan L87 disenfranchises these counties' citizens by gerrymandering these districts to eliminate the impact of the county electorate.

51. While the Redistricting Commission, in approving Plan L87, did not *prima facie* violate the U.S. Constitution by creating a population deviation in excess of 10%, it comes almost as close as it can at 9.92%. This deviation is not justified when other plans create a smaller deviation and do not unconstitutionally divide counties. Plan L82 has a total deviation of 8.76%, and Plan L76 has a total deviation of 8.03% with only five (5) county splits and only seven (7) trans-county districts.

52. Failure to abide by the requirements of Article III §5 of the Idaho Constitution, and Idaho Code §72-1506(3), renders Plan L87 unconstitutional and illegal, and establishes that the adoption of Plan L87 by the Commission on Redistricting was done in an arbitrary and capricious manner.

PRAYER FOR RELIEF

For all of the reasons set forth above, Petitioners respectfully pray for relief as follows:

A. That the Idaho Supreme Court immediately issue an appropriate writ of prohibition or appropriate injunction enjoining implementation and enforcement of Plan L87 as adopted by the Idaho Commission on Reapportionment.

B. That the Court enters an order establishing legislative districts in the state of Idaho which will comply with Constitutional and statutory requirements.

C. That the Supreme Court enter an order or writ directing Respondents to refrain from acting pending a hearing in which they are ordered to show cause why the relief sought by Petitioners should not be granted.

D. In the alternative, that the Court order the original Redistricting Commission or a new Redistricting Commission, to convene and provide ample opportunity for public comment and hearing on a proposed plan consisting of Plan L82, or an alternate plan that complies with existing Constitutional and statutory law.

E. In the alternative, that the Court adopt Plan L76 as the only plan that complies strictly with the minimum county split requirement under the Idaho Constitution, Article III, §5.

F. In light of the uncommon nature of this action, Petitioners request that the Court issue an order outlining and clarifying the procedural rules it will follow in these proceedings. Briefing and oral argument are requested.

G. For such further and other relief as the Court deems just and necessary.

DATED this 5th day of December, 2011.

Christ T. Troupis
Attorney for Petitioners

STATE OF IDAHO,)
ss.
County of Benewah)

Jack Buell, Phillip Lampert, and N.L. "Bud" McCall, Benewah County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

JACK BUELL

PHILLIP LAMPERT

N.L. "BUD" McCALL

SUBSCRIBED AND SWORN To before me this 5th day of December, 2011.

LINDA LAW NOTARY PUBLIC STATE OF IDAHO

Notary Public for Idaho
Residing at: St Maries, Id
My Commission Expires: 8/2/2012

STATE OF IDAHO,)
ss.
County of Bonner)

Cornel Rasor, Mike Nielsen, and Lewis Rich, Bonner County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

CORNEL RASOR

MIKE NIELSEN

LEWIS RICH

SUBSCRIBED AND SWORN To before me this 6th day of December, 2011.

PAMELA J. VASQUEZ NOTARY PUBLIC STATE OF IDAHO

Notary Public for Idaho
Residing at: Sandpoint, ID
My Commission Expires: 5-8-12

STATE OF IDAHO,)
ss.
County of Boundary)

Ronald R. Smith, Dan Dinning, and Walt Kirby, Boundary County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

RONALD R. SMITH

DAN DINNING

WALT KIRBY

BOARD OF COUNTY COMMISSIONERS SEAL BOUNDARY COUNTY IDAHO

SUBSCRIBED AND SWORN To before me this 5th day of December, 2011.

Michelle Rohrwasser
Notary Public for Idaho
Residing at: Bonners Ferry, Idaho
My Commission Expires: 11-15-16

MICHELLE ROHRWASSER NOTARY PUBLIC STATE OF IDAHO

STATE OF IDAHO,)
ss.
County of Shoshone)

Vince Rinaldi, Larry Yergler, and Jon Cantamessa, Shoshone County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

VINCE RINALDI

LARRY YERGLER

JON CANTAMESSA

SUBSCRIBED AND SWORN To before me this 5th day of December, 2011.

PEGGI HARRIS
NOTARY PUBLIC
STATE OF IDAHO

Notary Public for Idaho
Residing at: Wallace
My Commission Expires: 8-25-16

STATE OF IDAHO,)
ss.
County of Idaho)

Skip Brandt, James Rockwell, and Jim Chmelik, Idaho County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

SKIP BRANDT

JAMES ROCKWELL

JIM CHMELIK

SUBSCRIBED AND SWORN To before me this 5th day of December, 2011.

BETTE J. O'BRIEN NOTARY PUBLIC STATE OF IDAHO

Notary Public for Idaho
Residing at: Grangeville
My Commission Expires: 4-6-2013

STATE OF IDAHO,)
ss.
County of Lewis)

Carroll A. Keith, Charles E. Doty, and Don Davis, Lewis County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

CARROLL A. KEITH

CHARLES E. DOTY

DON DAVIS

SUBSCRIBED AND SWORN To before me this ____ day of December, 2011.

Notary Public for Idaho
Residing at:
My Commission Expires:

STATE OF IDAHO,)
ss.
County of Clearwater)

Don Ebert, Stan Leach, and Carole Galloway, Clearwater County Commissioners, being first duly sworn, depose and say:

That they are the Petitioners in the foregoing action; that they have read the foregoing Petition and know the contents thereof, and as to the matters and things alleged, affiants believe the same to be true and correct.

Don Ebert
DON EBERT

Stan Leach
STAN LEACH

Carole Galloway
CAROLE GALLOWAY

SUBSCRIBED AND SWORN To before me this 5th day of December, 2011.

CLEARWATER COUNTY DISTRICT COURT SECOND JUDICIAL DISTRICT STATE OF IDAHO

Carrie Bird
Notary Public for Idaho
Residing at:
My Commission Expires:

STATE OF IDAHO,)
ss.
County of Benewah)

Pamela Kaynor, being first duly sworn, deposes and says:

That she is the Managing Member of Idaho Citizens for Equitable Redistricting, an Idaho Nonprofit Corporation; that it is one of the Petitioners in the foregoing action; that she has read the foregoing Petition and knows the contents thereof, and as to the matters and things alleged, affiant believes the same to be true and correct.

PAMELA KAYNOR

SUBSCRIBED AND SWORN To before me this 2nd day of December, 2011.

JAMES C. MINSER NOTARY PUBLIC STATE OF IDAHO

Notary Public for Idaho
Residing at:
My Commission Expires: April 7, 2014

pd

ADDRESSES OF CO-COUNSEL FOR PETITIONERS

Douglas Payne, Benewah County Prosecutor
Courthouse
St. Maries, Idaho 83861
Telephone: 208/245-2564

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Telephone: 208/263-6714
Facsimile: 208/263-6726

Jack Douglas, Boundary County Prosecutor
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Bonners Ferry, ID 83805
Telephone: 208/267-7545
Facsimile: 208/267-5284

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150 Michigan Ave
Orofino, Idaho 83544
Telephone: 208/476-5611
Facsimile: 208/476-8989

Kirk A. MacGregor, Idaho County Prosecutor
416 West Main Street
PO Box 463
Grangeville, Idaho 83530
Telephone: 208/983-0166
Facsimile: 208/983-3919

Kimron Torgerson, Lewis County Prosecutor
510 Oak Street, Ste 2
Nez Perce, Idaho 83543
Telephone: 208/937-2271
Facsimile: 208/937-9240

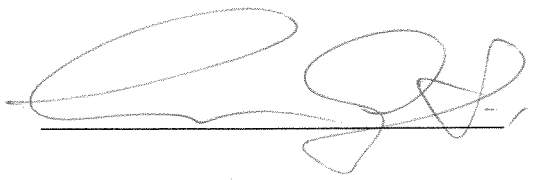
Val Siegel, Shoshone County Prosecutor
700 Bank Street, Suite 200, Wallace, ID 83873
Telephone: 208/752-1106
Facsimile: 208/753-8351

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7 day of December, 2011, a true and accurate copy of the foregoing Petition Challenging Legislative Redistricting, Application for Injunctive Relief and Application for Writ of Prohibition, together with Affidavit of Lawerence Denney, Speaker of the Idaho House of Representatives, and Affidvait of Lou Esposito, were hand delivered to the following:

Idaho Redistricting Commission
Legislative Services Office
P.O. Box 83720
Boise, ID 83720-0054
Boise, Idaho 83720

Office of the Secretary of State
700 West Jefferson, Room E205
P.O. Box 83720
Boise, Idaho 83720-0080



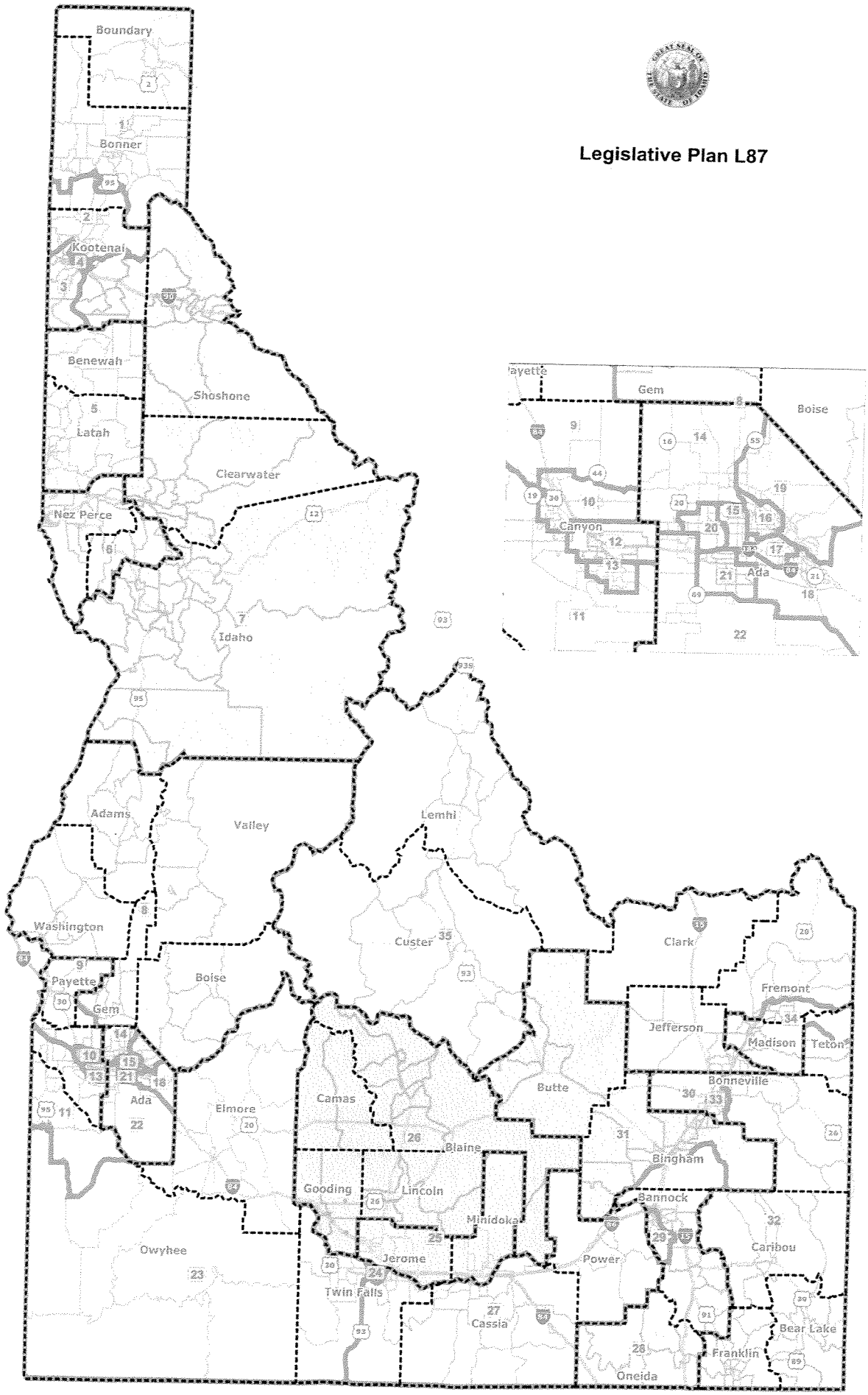

Legislative Plan L87
Boundary
Bonner
Kootenai
Benewah
Shoshone
Latah
Clearwater
Nez Perce
Idaho
Adams
Valley
Lemhi
Washington
Payette
Gem
Boise
Ada
Canyon
Custer
Clark
Fremont
Jefferson
Madison
Teton
Bonneville
Butte
Camas
Elmore
Blaine
Bingham
Gooding
Lincoln
Minidoka
Bannock
Caribou
Owyhee
Jerome
Power
Twin Falls
Cassia
Bear Lake
Franklin
Oneida

EXHIBIT A

Current Legislative 35 Plan: L87_Mapping
Administrator: LSO

10/14/2011
11:36 a.m.

Population Summary Report

Overall Range:			9.92 Percent	4,444 Persons
Largest District:	46,887	Deviation:	4.69 Percent	2,099 Persons
Smallest District:	42,443	Deviation:	-5.24 Percent	-2,345 Persons
		Mean Deviation:	2.83 Percent	1,266.57 Persons
		Standard Deviation:	1,419	1,419.37 Persons
Ideal District:	44,788			

District	Population	Deviation	% Devn.
1	46,492	1,704	3.80
2	46,142	1,354	3.02
3	46,276	1,488	3.32
4	46,278	1,490	3.33
5	46,529	1,741	3.89
6	43,086	-1,702	-3.80
7	42,948	-1,840	-4.11
8	46,317	1,529	3.41
9	44,283	-505	-1.13
10	44,769	-19	-0.04
11	44,583	-205	-0.46
12	44,216	-572	-1.28
13	44,155	-633	-1.41
14	44,919	131	0.29
15	42,799	-1,989	-4.44
16	44,383	-405	-0.90
17	43,778	-1,010	-2.26
18	43,612	-1,176	-2.63
19	42,895	-1,893	-4.23
20	42,610	-2,178	-4.86
21	43,541	-1,247	-2.78
22	43,828	-960	-2.14
23	46,669	1,881	4.20
24	46,887	2,099	4.69
25	42,443	-2,345	-5.24
26	43,165	-1,623	-3.62

EXHIBIT B

District	Population	Deviation	% Devn.
27	44,013	-775	-1.73
28	46,254	1,466	3.27
29	43,701	-1,087	-2.43
30	46,525	1,737	3.88
31	45,668	880	1.96
32	46,089	1,301	2.90
33	45,964	1,176	2.63
34	46,012	1,224	2.73
35	45,753	965	2.15

State Total: **1,567,582**

Plan: L87_Mapping
Plan Type: Current Legislative 35
Administrator User: LSO

Plan Components Report

Friday, October 14, 2011 11:39 AM

	POPULATION
District 1	
Bonner ID County	
VTD: 2Algoma	1,542
VTD: Airport	1,452
VTD: Baldy	2,263
VTD: Blue Lake	231
VTD: Clark Fork	1,309
VTD: Cocolalla	908
VTD: Colburn	1,807
VTD: Dover	596
VTD: E. Priest River	1,573
VTD: Gamlin Lake	693
VTD: Grouse Creek	1,084
VTD: Hope	988
VTD: Humbird	1,890
VTD: Kootenai	3,244
VTD: Laclede	598
VTD: Lakeview	140
VTD: Lamb Creek	625
VTD: Oden	681
VTD: Oldtown	2,443
VTD: Priest Lake	257
VTD: Priest River West City	736
VTD: Sagle	2,038
VTD: Sandpoint	1,507
VTD: Selle	773
VTD: Selle II	482
VTD: South Side	304
VTD: W. Priest River Bench	697
VTD: Washington	2,149
VTD: West Branch	525
VTD: Westmond	1,564
VTD: Wrenco	421
Bonner ID County Subtotal	**35,520**
Boundary ID County	10,972
District 1 Subtotal	**46,492**
District 2	
Bonner ID County	
VTD: Careywood	1,461
VTD: Edgemere	2,367
VTD: Spirit Valley	1,529
Bonner ID County Subtotal	**5,357**

	POPULATION
District 2 (continued)	
Kootenai ID County	
VTD: 1	2,263
VTD: 10 *(part)*	372
VTD: 12 *(part)*	1,139
VTD: 13	828
VTD: 14	2,211
VTD: 15	2,197
VTD: 16	2,074
VTD: 17	1,637
VTD: 18	3,514
VTD: 19	2,253
VTD: 2	2,070
VTD: 20	2,988
VTD: 21	1,643
VTD: 22 *(part)*	1,978
VTD: 3	2,261
VTD: 39 *(part)*	0
VTD: 4	1,436
VTD: 40	1,699
VTD: 49 *(part)*	20
VTD: 5	2,312
VTD: 50 *(part)*	0
VTD: 6	3,079
VTD: 7	2,339
VTD: 8 *(part)*	472
Kootenai ID County Subtotal	**40,785**
District 2 Subtotal	**46,142**
District 3	
Kootenai ID County	
VTD: 10 *(part)*	1,175
VTD: 11	2,538
VTD: 12 *(part)*	0
VTD: 23	2,958
VTD: 24	1,785
VTD: 25	3,370
VTD: 26	1,719
VTD: 27	1,689
VTD: 28 *(part)*	3,302
VTD: 29	1,820
VTD: 30	2,846
VTD: 31	838
VTD: 32	2,442
VTD: 33	1,241
VTD: 34	2,490
VTD: 35 *(part)*	1,392
VTD: 36 *(part)*	1,365
VTD: 63	1,807
VTD: 64	1,066
VTD: 65	1,163
VTD: 66	1,162

	POPULATION
District 3 (continued)	
Kootenai ID County (continued)	
VTD: 69	1,639
VTD: 8 *(part)*	3,088
VTD: 9	3,381
Kootenai ID County Subtotal	**46,276**
District 3 Subtotal	**46,276**
District 4	
Kootenai ID County	
VTD: 22 *(part)*	108
VTD: 28 *(part)*	742
VTD: 35 *(part)*	616
VTD: 36 *(part)*	893
VTD: 37	1,338
VTD: 38	6,154
VTD: 39 *(part)*	3,193
VTD: 41	1,468
VTD: 42	1,070
VTD: 43	1,525
VTD: 44	2,477
VTD: 45	2,831
VTD: 46	2,517
VTD: 47	1,667
VTD: 48 *(part)*	1,667
VTD: 49 *(part)*	1,420
VTD: 50 *(part)*	1,016
VTD: 51	1,556
VTD: 52	1,604
VTD: 53	2,343
VTD: 54	1,960
VTD: 55	1,361
VTD: 56	1,275
VTD: 57	1,573
VTD: 58	1,575
VTD: 59	1,227
VTD: 60 *(part)*	1,102
Kootenai ID County Subtotal	**46,278**
District 4 Subtotal	**46,278**
District 5	
Benewah ID County	9,285
Latah ID County	37,244
District 5 Subtotal	**46,529**
District 6	
Lewis ID County	3,821
Nez Perce ID County	39,265
District 6 Subtotal	**43,086**
District 7	
Clearwater ID County	8,761

	POPULATION
District 7 (continued)	
Idaho ID County	16,267
Kootenai ID County	
VTD: 48 *(part)*	46
VTD: 50 *(part)*	634
VTD: 60 *(part)*	32
VTD: 61	1,601
VTD: 62	948
VTD: 67	624
VTD: 68	362
VTD: 70	319
VTD: 71	589
Kootenai ID County Subtotal	**5,155**
Shoshone ID County	12,765
District 7 Subtotal	**42,948**
District 8	
Adams ID County	3,976
Boise ID County	7,028
Gem ID County	
VTD: 1 Central	1,428
VTD: 10 Brick	1,314
VTD: 11 Bench	891
VTD: 12 Sweet-Montour	756
VTD: 13 Ola	174
VTD: 2 North Emmett	1,192
VTD: 3 Butteview	1,430
VTD: 4 South Emmett	1,740
VTD: 5 West Emmett	1,084
VTD: 6 Emerson	2,276
VTD: 7 Lincoln	1,553
VTD: 8 Letha *(part)*	360
VTD: 9 Hanna	1,055
Gem ID County Subtotal	**15,253**
Valley ID County	9,862
Washington ID County	10,198
District 8 Subtotal	**46,317**
District 9	
Canyon ID County	
VTD: 01	1,567
VTD: 18	3,250
VTD: 29 *(part)*	6,722
VTD: 51	2,835
VTD: 52	2,175
VTD: 56 *(part)*	3,645
Canyon ID County Subtotal	**20,194**
Gem ID County	
VTD: 8 Letha *(part)*	1,466

	POPULATION
District 9 (continued)	
Gem ID County Subtotal	**1,466**
Payette ID County	22,623
District 9 Subtotal	**44,283**
District 10	
Canyon ID County	
VTD: 04	1,697
VTD: 05	2,397
VTD: 06	1,608
VTD: 07 *(part)*	3,768
VTD: 08	1,986
VTD: 09	2,658
VTD: 10	1,363
VTD: 11 *(part)*	6,332
VTD: 12 *(part)*	3,666
VTD: 13 *(part)*	7,412
VTD: 15 *(part)*	2,289
VTD: 20 *(part)*	779
VTD: 23 *(part)*	584
VTD: 27 *(part)*	6,983
VTD: 29 *(part)*	61
VTD: 55 *(part)*	327
VTD: 56 *(part)*	859
Canyon ID County Subtotal	**44,769**
District 10 Subtotal	**44,769**
District 11	
Canyon ID County	
VTD: 03	3,085
VTD: 07 *(part)*	5
VTD: 11 *(part)*	2,844
VTD: 12 *(part)*	14
VTD: 15 *(part)*	159
VTD: 19	1,283
VTD: 21	2,444
VTD: 22	1,353
VTD: 23 *(part)*	937
VTD: 25 *(part)*	473
VTD: 28	3,092
VTD: 30 *(part)*	1,711
VTD: 31 *(part)*	962
VTD: 39 *(part)*	3,278
VTD: 49 *(part)*	427
VTD: 50 *(part)*	2,186
VTD: 54	2,206
VTD: 55 *(part)*	988
VTD: 57	1,232
VTD: 59 *(part)*	2,137
VTD: 60 *(part)*	1,922
VTD: 62	2,851
Canyon ID County Subtotal	**35,589**

	POPULATION
District 11 (continued)	
Owyhee ID County	
VTD: 1 N. Homedale	1,793
VTD: 2 S. Homedale	2,548
VTD: 3 N. Marsing	1,529
VTD: 4 S. Marsing	1,634
VTD: 6 Wilson	1,161
VTD: 7 Murphy	329
Owyhee ID County Subtotal	**8,994**
District 11 Subtotal	**44,583**
District 12	
Canyon ID County	
VTD: 13 *(part)*	853
VTD: 20 *(part)*	3,595
VTD: 23 *(part)*	3
VTD: 25 *(part)*	236
VTD: 27 *(part)*	756
VTD: 30 *(part)*	5,102
VTD: 31 *(part)*	2,583
VTD: 33 *(part)*	1,430
VTD: 38	6,057
VTD: 40	6,476
VTD: 43	3,190
VTD: 44 *(part)*	1,298
VTD: 45	1,962
VTD: 46	5,390
VTD: 47 *(part)*	2,162
VTD: 48	3,123
Canyon ID County Subtotal	**44,216**
District 12 Subtotal	**44,216**
District 13	
Canyon ID County	
VTD: 32	3,309
VTD: 33 *(part)*	4,678
VTD: 34	4,199
VTD: 35	4,163
VTD: 36	3,819
VTD: 37	3,557
VTD: 39 *(part)*	1,689
VTD: 41	2,940
VTD: 42	2,130
VTD: 44 *(part)*	1,490
VTD: 47 *(part)*	1,429
VTD: 49 *(part)*	3,959
VTD: 50 *(part)*	2,154
VTD: 59 *(part)*	4,014
VTD: 60 *(part)*	625
Canyon ID County Subtotal	**44,155**
District 13 Subtotal	**44,155**
District 14	

	POPULATION
District 14 (continued)	
Ada ID County	
VTD: 1	3,754
VTD: 10	1,127
VTD: 126	3,765
VTD: 127	2,618
VTD: 128 *(part)*	2,460
VTD: 129 *(part)*	1,534
VTD: 130	5,984
VTD: 135 *(part)*	627
VTD: 2	1,911
VTD: 4	1,766
VTD: 42 *(part)*	1,503
VTD: 43	3,515
VTD: 44 *(part)*	2,646
VTD: 5	2,027
VTD: 6	3,690
VTD: 7 *(part)*	1,277
VTD: 8	1,789
VTD: 9	2,926
Ada ID County Subtotal	**44,919**
District 14 Subtotal	**44,919**
District 15	
Ada ID County	
VTD: 17	3,922
VTD: 18	2,856
VTD: 19	1,464
VTD: 20	1,766
VTD: 27	3,965
VTD: 28	2,302
VTD: 29	1,433
VTD: 48 *(part)*	507
VTD: 49	3,195
VTD: 50 *(part)*	4,656
VTD: 51	2,728
VTD: 52	3,033
VTD: 53 *(part)*	2,245
VTD: 64 *(part)*	4,734
VTD: 65 *(part)*	2,617
VTD: 66 *(part)*	1,376
VTD: 79 *(part)*	0
Ada ID County Subtotal	**42,799**
District 15 Subtotal	**42,799**
District 16	
Ada ID County	
VTD: 11	2,830
VTD: 21	1,121
VTD: 22	3,236
VTD: 23	4,093
VTD: 24	944

	POPULATION
District 16 (continued)	
Ada ID County (continued)	
VTD: 25	4,040
VTD: 26	2,192
VTD: 30	2,155
VTD: 31	3,363
VTD: 32	1,128
VTD: 33	3,865
VTD: 34	1,711
VTD: 35	1,102
VTD: 53 *(part)*	958
VTD: 54	1,754
VTD: 55	2,356
VTD: 56	2,417
VTD: 57	3,974
VTD: 58 *(part)*	1,144
VTD: 69 *(part)*	0
Ada ID County Subtotal	**44,383**
District 16 Subtotal	**44,383**
District 17	
Ada ID County	
VTD: 65 *(part)*	596
VTD: 66 *(part)*	2,665
VTD: 67	5,257
VTD: 68	2,745
VTD: 69 *(part)*	1,397
VTD: 70	1,534
VTD: 71	1,640
VTD: 75	2,684
VTD: 79 *(part)*	1,268
VTD: 80	1,193
VTD: 81	2,609
VTD: 82	2,470
VTD: 83	3,320
VTD: 84	1,568
VTD: 85	2,341
VTD: 86	2,104
VTD: 97	2,431
VTD: 98	2,753
VTD: 99	3,203
Ada ID County Subtotal	**43,778**
District 17 Subtotal	**43,778**
District 18	
Ada ID County	
VTD: 100	2,474
VTD: 101	1,763
VTD: 102	2,758
VTD: 103	1,427
VTD: 104	2,344
VTD: 105	2,315

	POPULATION
District 18 (continued)	
Ada ID County (continued)	
VTD: 106	1,943
VTD: 107	2,434
VTD: 108	1,927
VTD: 113	421
VTD: 114	3,707
VTD: 116	3,007
VTD: 120 *(part)*	1,740
VTD: 121	80
VTD: 139	3,070
VTD: 74 *(part)*	2,072
VTD: 87	3,114
VTD: 88	1,379
VTD: 94	3,573
VTD: 95	2,064
Ada ID County Subtotal	**43,612**
District 18 Subtotal	**43,612**
District 19	
Ada ID County	
VTD: 12	2,168
VTD: 128 *(part)*	783
VTD: 129 *(part)*	1,356
VTD: 13	2,548
VTD: 14	1,061
VTD: 15	1,475
VTD: 16	2,669
VTD: 3	2,466
VTD: 36	1,835
VTD: 37	1,841
VTD: 38	1,959
VTD: 39	2,215
VTD: 40	1,217
VTD: 41	2,590
VTD: 58 *(part)*	954
VTD: 59	2,666
VTD: 60	3,111
VTD: 7 *(part)*	1,527
VTD: 72	1,728
VTD: 73	1,830
VTD: 74 *(part)*	1,219
VTD: 76	1,872
VTD: 77	1,805
Ada ID County Subtotal	**42,895**
District 19 Subtotal	**42,895**
District 20	
Ada ID County	
VTD: 131	5,797
VTD: 132	5,811
VTD: 133	4,458

	POPULATION
District 20 (continued)	
Ada ID County (continued)	
VTD: 134	2,082
VTD: 136	2,990
VTD: 44 *(part)*	177
VTD: 45	4,035
VTD: 46	5,311
VTD: 47	3,382
VTD: 48 *(part)*	2,532
VTD: 50 *(part)*	389
VTD: 63	4,667
VTD: 64 *(part)*	979
Ada ID County Subtotal	**42,610**
District 20 Subtotal	**42,610**
District 21	
Ada ID County	
VTD: 109	5,400
VTD: 110	5,289
VTD: 111	2,968
VTD: 112	3,785
VTD: 115	3,321
VTD: 118 *(part)*	1,474
VTD: 119	7,116
VTD: 138	2,191
VTD: 90	2,780
VTD: 91	2,918
VTD: 92	1,718
VTD: 93	1,917
VTD: 96	2,664
Ada ID County Subtotal	**43,541**
District 21 Subtotal	**43,541**
District 22	
Ada ID County	
VTD: 117	3,144
VTD: 118 *(part)*	576
VTD: 120 *(part)*	3,059
VTD: 122	2,799
VTD: 123	3,807
VTD: 124	5,028
VTD: 125	167
VTD: 135 *(part)*	2,463
VTD: 137	2,352
VTD: 140	3,978
VTD: 141	4,170
VTD: 42 *(part)*	197
VTD: 61	2,814
VTD: 62	2,173
VTD: 78	4,872
VTD: 89	2,229
Ada ID County Subtotal	**43,828**

	POPULATION
District 22 Subtotal	**43,828**
District 23	
Elmore ID County	27,038
Owyhee ID County	
VTD: 10 Bruneau	787
VTD: 11 Riddle	390
VTD: 12 Three Creek	52
VTD: 5 Pleasant Valley	96
VTD: 8 Oreana	200
VTD: 9 Grand View	1,007
Owyhee ID County Subtotal	**2,532**
Twin Falls ID County	
VTD: Buhl 1	1,524
VTD: Buhl 2	1,339
VTD: Buhl 3	941
VTD: Buhl 4	1,410
VTD: Buhl 5	727
VTD: Buhl 6	518
VTD: Buhl 7	1,510
VTD: Castleford	975
VTD: Clover	398
VTD: Deep Creek	1,131
VTD: Filer 1	1,613
VTD: Filer 2 *(part)*	1,301
VTD: Filer 3	1,944
VTD: Hollister *(part)*	726
VTD: Maroa *(part)*	489
VTD: Outside T.F. 23 *(part)*	553
Twin Falls ID County Subtotal	**17,099**
District 23 Subtotal	**46,669**
District 24	
Twin Falls ID County	
VTD: Kimberly 1 *(part)*	5
VTD: Maroa *(part)*	54
VTD: Outside T.F. 21 *(part)*	0
VTD: Outside T.F. 22 *(part)*	229
VTD: Outside T.F. 23 *(part)*	574
VTD: Outside T.F. 24	1,220
VTD: Outside T.F. 25 *(part)*	1,111
VTD: Twin Falls 1	1,720
VTD: Twin Falls 10	1,111
VTD: Twin Falls 11	2,012
VTD: Twin Falls 12	1,172
VTD: Twin Falls 13	2,480
VTD: Twin Falls 14	2,674
VTD: Twin Falls 15	3,452
VTD: Twin Falls 16	1,307
VTD: Twin Falls 17	1,606
VTD: Twin Falls 18 *(part)*	4,436
VTD: Twin Falls 19 *(part)*	2,230

	POPULATION
District 24 (continued)	
Twin Falls ID County (continued)	
VTD: Twin Falls 2	1,823
VTD: Twin Falls 20	2,091
VTD: Twin Falls 3	1,361
VTD: Twin Falls 4	3,392
VTD: Twin Falls 5	5,209
VTD: Twin Falls 6	1,628
VTD: Twin Falls 7	1,664
VTD: Twin Falls 8	1,508
VTD: Twin Falls 9	818
Twin Falls ID County Subtotal	**46,887**
District 24 Subtotal	**46,887**
District 25	
Jerome ID County	22,374
Minidoka ID County	20,069
District 25 Subtotal	**42,443**
District 26	
Blaine ID County	21,376
Camas ID County	1,117
Gooding ID County	15,464
Lincoln ID County	5,208
District 26 Subtotal	**43,165**
District 27	
Cassia ID County	22,952
Power ID County	7,817
Twin Falls ID County	
VTD: Filer 2 *(part)*	119
VTD: Hansen	2,782
VTD: Hollister *(part)*	496
VTD: Kimberly 1 *(part)*	2,071
VTD: Kimberly 2	2,132
VTD: Kimberly 3	1,104
VTD: Murtaugh	965
VTD: Outside T.F. 21 *(part)*	418
VTD: Outside T.F. 22 *(part)*	1,264
VTD: Outside T.F. 23 *(part)*	941
VTD: Outside T.F. 25 *(part)*	515
VTD: Twin Falls 18 *(part)*	431
VTD: Twin Falls 19 *(part)*	6
Twin Falls ID County Subtotal	**13,244**
District 27 Subtotal	**44,013**
District 28	
Bannock ID County	
VTD: Arimo 61	949
VTD: Chubbuck 50 *(part)*	1,486
VTD: Chubbuck 51	1,895

	POPULATION
District 28 (continued)	
Bannock ID County (continued)	
VTD: Chubbuck 52	1,239
VTD: Chubbuck 53	2,516
VTD: Chubbuck 54	1,225
VTD: Chubbuck 55	3,312
VTD: Chubbuck 56	1,283
VTD: Chubbuck 57	1,040
VTD: Chubbuck 58	1,047
VTD: Chubbuck 59	1,023
VTD: Chubbuck 60	2,026
VTD: Downey 62	1,013
VTD: Inkom 63	1,310
VTD: Lava Hot Springs 64	1,101
VTD: McCammon 65	1,447
VTD: Pebble Creek 67	903
VTD: Pocatello 34	1,359
VTD: Pocatello 35	1,886
VTD: Pocatello 36	1,176
VTD: Pocatello 37	1,748
VTD: Pocatello 38	868
VTD: Pocatello 39	1,254
VTD: Pocatello 40	501
VTD: Pocatello 41	1,920
VTD: Pocatello 42	1,122
VTD: Pocatello 43 *(part)*	2,384
VTD: Swan Lake 68	105
Bannock ID County Subtotal	**39,138**
Bingham ID County	
VTD: Fort Hall 20	2,830
Bingham ID County Subtotal	**2,830**
Oneida ID County	4,286
District 28 Subtotal	**46,254**
District 29	
Bannock ID County	
VTD: Chubbuck 50 *(part)*	457
VTD: Mink Creek 66	1,323
VTD: Pocatello 1	1,061
VTD: Pocatello 10	1,754
VTD: Pocatello 11	1,779
VTD: Pocatello 12	1,434
VTD: Pocatello 13	1,721
VTD: Pocatello 14	1,502
VTD: Pocatello 15	1,403
VTD: Pocatello 17	1,635
VTD: Pocatello 18	1,427
VTD: Pocatello 19	1,228
VTD: Pocatello 2	1,176
VTD: Pocatello 20	1,419
VTD: Pocatello 21	1,582

	POPULATION
District 29 (continued)	
Bannock ID County (continued)	
VTD: Pocatello 22	1,364
VTD: Pocatello 23	1,290
VTD: Pocatello 24	1,198
VTD: Pocatello 25	1,152
VTD: Pocatello 26	1,643
VTD: Pocatello 27	1,440
VTD: Pocatello 28	2,114
VTD: Pocatello 3	1,073
VTD: Pocatello 31	1,050
VTD: Pocatello 32	908
VTD: Pocatello 4	2,298
VTD: Pocatello 43 *(part)*	20
VTD: Pocatello 5	1,289
VTD: Pocatello 6	1,756
VTD: Pocatello 7	1,468
VTD: Pocatello 8	1,335
VTD: Pocatello 9	1,402
Bannock ID County Subtotal	**43,701**
District 29 Subtotal	**43,701**
District 30	
Bonneville ID County	
VTD: 1 *(part)*	1,178
VTD: 13 *(part)*	1,050
VTD: 2 *(part)*	2
VTD: 21 *(part)*	1,204
VTD: 22 *(part)*	966
VTD: 27	3,199
VTD: 28	2,668
VTD: 36	1,074
VTD: 37	1,190
VTD: 38	620
VTD: 39	1,649
VTD: 4 *(part)*	41
VTD: 40	2,501
VTD: 41 *(part)*	2,688
VTD: 42	845
VTD: 45 *(part)*	4,440
VTD: 46	3,664
VTD: 47	2,343
VTD: 48 *(part)*	3,213
VTD: 49	2,224
VTD: 5 *(part)*	336
VTD: 50	3,850
VTD: 51	2,654
VTD: 52	2,926
Bonneville ID County Subtotal	**46,525**
District 30 Subtotal	**46,525**
District 31	

Plan: L87_Mapping
Type: Current Legislative 35

Administrator: LSO
User:

	POPULATION
District 31 (continued)	
Bingham ID County	
VTD: Aberdeen 15	3,011
VTD: Blackfoot 1	2,340
VTD: Blackfoot 2	1,203
VTD: Blackfoot 23	1,162
VTD: Blackfoot 3	2,032
VTD: Blackfoot 4	2,701
VTD: Blackfoot 5	2,670
VTD: Blackfoot 6	1,844
VTD: Firth 7	1,922
VTD: Firth 8	1,602
VTD: Groveland 22	1,282
VTD: Groveland 9	2,765
VTD: Jamestown 10	1,667
VTD: Moreland 11	1,223
VTD: Moreland 25	1,557
VTD: Pingree 18	1,258
VTD: Riverside 17	1,668
VTD: Riverside 24	986
VTD: Rockford 12	1,456
VTD: Shelley 13	2,542
VTD: Shelley 14	2,254
VTD: Shelley West 21	2,136
VTD: Springfield/Sterling 16	691
VTD: Wapello 19	805
Bingham ID County Subtotal	**42,777**
Butte ID County	2,891
District 31 Subtotal	**45,668**
District 32	
Bear Lake ID County	5,986
Bonneville ID County	
VTD: 43	1,703
VTD: 44	1,212
VTD: 45 *(part)*	14
VTD: 53	2,440
VTD: 54	884
VTD: 55	696
VTD: 56	34
VTD: 57	60
VTD: 58	3,521
VTD: 59	1,181
Bonneville ID County Subtotal	**11,745**
Caribou ID County	6,963
Franklin ID County	12,786
Teton ID County	
VTD: 1	2,833
VTD: 2	2,879
VTD: 3	2,407

	POPULATION
District 32 (continued)	
Teton ID County (continued)	
VTD: 4 *(part)*	490
Teton ID County Subtotal	**8,609**
District 32 Subtotal	**46,089**
District 33	
Bonneville ID County	
VTD: 1 *(part)*	620
VTD: 10	2,073
VTD: 11	1,890
VTD: 12	1,738
VTD: 13 *(part)*	1,783
VTD: 14	1,495
VTD: 15	1,847
VTD: 16	1,808
VTD: 17	2,564
VTD: 18	2,007
VTD: 19	1,872
VTD: 2 *(part)*	1,780
VTD: 20	1,909
VTD: 21 *(part)*	877
VTD: 22 *(part)*	617
VTD: 23	1,537
VTD: 24	2,548
VTD: 25	1,760
VTD: 26	1,548
VTD: 3	1,486
VTD: 4 *(part)*	1,716
VTD: 41 *(part)*	0
VTD: 48 *(part)*	0
VTD: 5 *(part)*	1,789
VTD: 6	2,701
VTD: 7	1,920
VTD: 8	2,065
VTD: 9	2,014
Bonneville ID County Subtotal	**45,964**
District 33 Subtotal	**45,964**
District 34	
Fremont ID County	
VTD: 1 Ashton 1 *(part)*	0
VTD: 10 St. Anthony 2 *(part)*	1,178
VTD: 11 St. Anthony 3 *(part)*	1,615
VTD: 12 Teton	817
VTD: 14 Wilford *(part)*	697
VTD: 3 Chester/Twin Groves *(part)*	1,012
VTD: 4 Drummond/Lamont/Squirrel *(part)*	51
VTD: 7 Newdale	372
VTD: 9 St. Anthony 1 *(part)*	1,173
Fremont ID County Subtotal	**6,915**
Madison ID County	37,536

Plan: L87_Mapping
Type: Current Legislative 35

Administrator: LSO
User:

	POPULATION
District 34 (continued)	
Teton ID County	
VTD: 4 *(part)*	1,561
Teton ID County Subtotal	**1,561**
District 34 Subtotal	**46,012**
District 35	
Clark ID County	982
Custer ID County	4,368
Fremont ID County	
VTD: 1 Ashton 1 *(part)*	846
VTD: 10 St. Anthony 2 *(part)*	66
VTD: 11 St. Anthony 3 *(part)*	0
VTD: 13 Warm-River/Green Timber	163
VTD: 14 Wilford *(part)*	427
VTD: 2 Ashton 2	1,274
VTD: 3 Chester/Twin Groves *(part)*	203
VTD: 4 Drummond/Lamont/Squirrel *(part)*	220
VTD: 5 Egin	1,076
VTD: 6 Island Park	1,092
VTD: 8 Parker	902
VTD: 9 St. Anthony 1 *(part)*	58
Fremont ID County Subtotal	**6,327**
Jefferson ID County	26,140
Lemhi ID County	7,936
District 35 Subtotal	**45,753**
State totals	**1,567,582**

Plan Name: L87_Mapping
Plan Type: Current Legislative 35
Administrator: LSO

Political Subdivisions Split Between Districts

Friday October 14, 2011 11:37 AM

Number of subdivisions not split:

County	32
Voting Precinct	839

Number of subdivisions split into more than one district:

County	12
Voting Precinct	83

Number of subdivision splits which affect *no* population:

County	0
Voting Precinct	10

Split Counts

County

Cases where an area is split among 2 Districts: 7
Cases where an area is split among 3 Districts: 2
Cases where an area is split among 4 Districts: 1
Cases where an area is split among 5 Districts: 1
Cases where an area is split among 9 Districts: 1

Voting Precinct

Cases where an area is split among 2 Districts: 80
Cases where an area is split among 3 Districts: 3

County	Voting Precinct	District	Population
Split Counties :			
Ada ID		14	44,919
Ada ID		15	42,799
Ada ID		16	44,383
Ada ID		17	43,778
Ada ID		18	43,612
Ada ID		19	42,895
Ada ID		20	42,610
Ada ID		21	43,541
Ada ID		22	43,828
Bannock ID		28	39,138
Bannock ID		29	43,701
Bingham ID		28	2,830

Plan Name: L87 Mapping
Plan Type: Current Legislative 35
Administrator: LSO
User:

County	Voting Precinct	District	Population
Split Counties (continued):			
Bingham ID		31	42,777
Bonner ID		1	35,520
Bonner ID		2	5,357
Bonneville ID		30	46,525
Bonneville ID		32	11,745
Bonneville ID		33	45,964
Canyon ID		9	20,194
Canyon ID		10	44,769
Canyon ID		11	35,589
Canyon ID		12	44,216
Canyon ID		13	44,155
Fremont ID		34	6,915
Fremont ID		35	6,327
Gem ID		8	15,253
Gem ID		9	1,466
Kootenai ID		2	40,785
Kootenai ID		3	46,276
Kootenai ID		4	46,278
Kootenai ID		7	5,155
Owyhee ID		11	8,994
Owyhee ID		23	2,532
Teton ID		32	8,609
Teton ID		34	1,561
Twin Falls ID		23	17,099
Twin Falls ID		24	46,887
Twin Falls ID		27	13,244
Split VTDs :			
Ada ID	118	21	1,474
Ada ID	118	22	576
Ada ID	120	18	1,740
Ada ID	120	22	3,059
Ada ID	128	14	2,460
Ada ID	128	19	783
Ada ID	129	14	1,534
Ada ID	129	19	1,356
Ada ID	135	14	627
Ada ID	135	22	2,463
Ada ID	42	14	1,503
Ada ID	42	22	197
Ada ID	44	14	2,646
Ada ID	44	20	177
Ada ID	48	15	507
Ada ID	48	20	2,532
Ada ID	50	15	4,656
Ada ID	50	20	389
Ada ID	53	15	2,245
Ada ID	53	16	958
Ada ID	58	16	1,144
Ada ID	58	19	954

Plan Name: L87 Mapping
Plan Type: Current Legislative 35
Administrator: LSO
User:

County	Voting Precinct	District	Population
Split VTDs (continued):			
Ada ID	64	15	4,734
Ada ID	64	20	979
Ada ID	65	15	2,617
Ada ID	65	17	596
Ada ID	66	15	1,376
Ada ID	66	17	2,665
Ada ID	69	16	0
Ada ID	69	17	1,397
Ada ID	7	14	1,277
Ada ID	7	19	1,527
Ada ID	74	18	2,072
Ada ID	74	19	1,219
Ada ID	79	15	0
Ada ID	79	17	1,268
Bannock ID	Chubbuck 50	28	1,486
Bannock ID	Chubbuck 50	29	457
Bannock ID	Pocatello 43	28	2,384
Bannock ID	Pocatello 43	29	20
Bonneville ID	1	30	1,178
Bonneville ID	1	33	620
Bonneville ID	13	30	1,050
Bonneville ID	13	33	1,783
Bonneville ID	2	30	2
Bonneville ID	2	33	1,780
Bonneville ID	21	30	1,204
Bonneville ID	21	33	877
Bonneville ID	22	30	966
Bonneville ID	22	33	617
Bonneville ID	4	30	41
Bonneville ID	4	33	1,716
Bonneville ID	41	30	2,688
Bonneville ID	41	33	0
Bonneville ID	45	30	4,440
Bonneville ID	45	32	14
Bonneville ID	48	30	3,213
Bonneville ID	48	33	0
Bonneville ID	5	30	336
Bonneville ID	5	33	1,789
Canyon ID	07	10	3,768
Canyon ID	07	11	5
Canyon ID	11	10	6,332
Canyon ID	11	11	2,844
Canyon ID	12	10	3,666
Canyon ID	12	11	14
Canyon ID	13	10	7,412
Canyon ID	13	12	853
Canyon ID	15	10	2,289
Canyon ID	15	11	159
Canyon ID	20	10	779

Plan Name: L87 Mapping Administrator: LSO
Plan Type: Current Legislative 35 User:

County	Voting Precinct	District	Population
Split VTDs (continued):			
Canyon ID	20	12	3,595
Canyon ID	23	10	584
Canyon ID	23	11	937
Canyon ID	23	12	3
Canyon ID	25	11	473
Canyon ID	25	12	236
Canyon ID	27	10	6,983
Canyon ID	27	12	756
Canyon ID	29	9	6,722
Canyon ID	29	10	61
Canyon ID	30	11	1,711
Canyon ID	30	12	5,102
Canyon ID	31	11	962
Canyon ID	31	12	2,583
Canyon ID	33	12	1,430
Canyon ID	33	13	4,678
Canyon ID	39	11	3,278
Canyon ID	39	13	1,689
Canyon ID	44	12	1,298
Canyon ID	44	13	1,490
Canyon ID	47	12	2,162
Canyon ID	47	13	1,429
Canyon ID	49	11	427
Canyon ID	49	13	3,959
Canyon ID	50	11	2,186
Canyon ID	50	13	2,154
Canyon ID	55	10	327
Canyon ID	55	11	988
Canyon ID	56	9	3,645
Canyon ID	56	10	859
Canyon ID	59	11	2,137
Canyon ID	59	13	4,014
Canyon ID	60	11	1,922
Canyon ID	60	13	625
Fremont ID	1 Ashton 1	34	0
Fremont ID	1 Ashton 1	35	846
Fremont ID	10 St. Anthony 2	34	1,178
Fremont ID	10 St. Anthony 2	35	66
Fremont ID	11 St. Anthony 3	34	1,615
Fremont ID	11 St. Anthony 3	35	0
Fremont ID	14 Wilford	34	697
Fremont ID	14 Wilford	35	427
Fremont ID	3 Chester/Twin Groves	34	1,012
Fremont ID	3 Chester/Twin Groves	35	203
Fremont ID	4 Drummond/Lamont/Squirrel	34	51
Fremont ID	4 Drummond/Lamont/Squirrel	35	220
Fremont ID	9 St. Anthony 1	34	1,173
Fremont ID	9 St. Anthony 1	35	58
Gem ID	8 Letha	8	360

County	Voting Precinct	District	Population
Split VTDs (continued):			
Gem ID	8 Letha	9	1,466
Kootenai ID	10	2	372
Kootenai ID	10	3	1,175
Kootenai ID	12	2	1,139
Kootenai ID	12	3	0
Kootenai ID	22	2	1,978
Kootenai ID	22	4	108
Kootenai ID	28	3	3,302
Kootenai ID	28	4	742
Kootenai ID	35	3	1,392
Kootenai ID	35	4	616
Kootenai ID	36	3	1,365
Kootenai ID	36	4	893
Kootenai ID	39	2	0
Kootenai ID	39	4	3,193
Kootenai ID	48	4	1,667
Kootenai ID	48	7	46
Kootenai ID	49	2	20
Kootenai ID	49	4	1,420
Kootenai ID	50	2	0
Kootenai ID	50	4	1,016
Kootenai ID	50	7	634
Kootenai ID	60	4	1,102
Kootenai ID	60	7	32
Kootenai ID	8	2	472
Kootenai ID	8	3	3,088
Teton ID	4	32	490
Teton ID	4	34	1,561
Twin Falls ID	Filer 2	23	1,301
Twin Falls ID	Filer 2	27	119
Twin Falls ID	Hollister	23	726
Twin Falls ID	Hollister	27	496
Twin Falls ID	Kimberly 1	24	5
Twin Falls ID	Kimberly 1	27	2,071
Twin Falls ID	Maroa	23	489
Twin Falls ID	Maroa	24	54
Twin Falls ID	Outside T.F. 21	24	0
Twin Falls ID	Outside T.F. 21	27	418
Twin Falls ID	Outside T.F. 22	24	229
Twin Falls ID	Outside T.F. 22	27	1,264
Twin Falls ID	Outside T.F. 23	23	553
Twin Falls ID	Outside T.F. 23	24	574
Twin Falls ID	Outside T.F. 23	27	941
Twin Falls ID	Outside T.F. 25	24	1,111
Twin Falls ID	Outside T.F. 25	27	515
Twin Falls ID	Twin Falls 18	24	4,436
Twin Falls ID	Twin Falls 18	27	431
Twin Falls ID	Twin Falls 19	24	2,230
Twin Falls ID	Twin Falls 19	27	6

Plan Name:	L87 Mapping	Administrator:	LSO
Plan Type:	Current Legislative 35	User:	

County	Voting Precinct	District	Population

Current Legislative 35 Plan: L82
Administrator: LSO

9/7/2011
11:07 a.m.

Population Summary Report

Overall Range:			8.76 Percent	3,924 Persons
Largest District:	46,768	Deviation:	4.42 Percent	1,980 Persons
Smallest District:	42,844	Deviation:	-4.34 Percent	-1,944 Persons
		Mean Deviation:	2.44 Percent	1,093.49 Persons
		Standard Deviation:	1,228	1,227.53 Persons
Ideal District:	44,788			

District	Population	Deviation	% Devn.
1	45,280	492	1.10
2	44,370	-418	-0.93
3	45,009	221	0.49
4	45,354	566	1.26
5	45,429	641	1.43
6	46,264	1,476	3.30
7	46,045	1,257	2.81
8	45,043	255	0.57
9	42,995	-1,793	-4.00
10	43,774	-1,014	-2.26
11	43,550	-1,238	-2.76
12	45,298	510	1.14
13	43,708	-1,080	-2.41
14	43,305	-1,483	-3.31
15	43,319	-1,469	-3.28
16	43,510	-1,278	-2.85
17	44,813	25	0.06
18	46,103	1,315	2.94
19	46,301	1,513	3.38
20	43,098	-1,690	-3.77
21	43,547	-1,241	-2.77
22	44,856	68	0.15
23	46,228	1,440	3.22
24	45,953	1,165	2.60
25	46,178	1,390	3.10
26	46,768	1,980	4.42

EXHHIBIT C

District	Population	Deviation	% Devn.
27	46,408	1,620	3.62
28	45,509	721	1.61
29	46,141	1,353	3.02
30	43,467	-1,321	-2.95
31	43,369	-1,419	-3.17
32	42,844	-1,944	-4.34
33	43,951	-837	-1.87
34	45,917	1,129	2.52
35	43,878	-910	-2.03

State Total: **1,567,582**

Plan Components Report

9/7/2011
11:08:16AM

	Population
District 1	
Bonner ID County (part)	34,308
Boundary ID County	10,972
District 1 Subtotal	**45,280**
District 2	
Bonner ID County (part)	6,569
Kootenai ID County (part)	37,801
District 2 Subtotal	**44,370**
District 3	
Kootenai ID County (part)	45,009
District 3 Subtotal	**45,009**
District 4	
Kootenai ID County (part)	45,354
District 4 Subtotal	**45,354**
District 5	
Benewah ID County	9,285
Kootenai ID County (part)	10,330
Latah ID County (part)	13,049
Shoshone ID County	12,765
District 5 Subtotal	**45,429**
District 6	
Latah ID County (part)	24,195
Nez Perce ID County (part)	22,069
District 6 Subtotal	**46,264**
District 7	
Clearwater ID County	8,761
Idaho ID County	16,267
Lewis ID County	3,821
Nez Perce ID County (part)	17,196
District 7 Subtotal	**46,045**
District 8	
Adams ID County	3,976

	Population
District 8 (continued)	
Canyon ID County (part)	8,246
Payette ID County	22,623
Washington ID County	10,198
District 8 Subtotal	**45,043**
District 9	
Ada ID County (part)	9,386
Boise ID County	7,028
Gem ID County	16,719
Valley ID County	9,862
District 9 Subtotal	**42,995**
District 10	
Canyon ID County (part)	32,248
Owyhee ID County	11,526
District 10 Subtotal	**43,774**
District 11	
Canyon ID County (part)	43,550
District 11 Subtotal	**43,550**
District 12	
Canyon ID County (part)	45,298
District 12 Subtotal	**45,298**
District 13	
Canyon ID County (part)	43,708
District 13 Subtotal	**43,708**
District 14	
Ada ID County (part)	43,305
District 14 Subtotal	**43,305**
District 15	
Ada ID County (part)	43,319
District 15 Subtotal	**43,319**
District 16	
Ada ID County (part)	43,510
District 16 Subtotal	**43,510**
District 17	
Ada ID County (part)	44,813
District 17 Subtotal	**44,813**
District 18	
Ada ID County (part)	46,103

	Population
District 18 Subtotal	**46,103**
District 19	
Ada ID County (part)	46,301
District 19 Subtotal	**46,301**
District 20	
Ada ID County (part)	43,098
District 20 Subtotal	**43,098**
District 21	
Ada ID County (part)	27,674
Canyon ID County (part)	15,873
District 21 Subtotal	**43,547**
District 22	
Ada ID County (part)	44,856
District 22 Subtotal	**44,856**
District 23	
Elmore ID County	27,038
Gooding ID County	15,464
Twin Falls ID County (part)	3,726
District 23 Subtotal	**46,228**
District 24	
Twin Falls ID County (part)	45,953
District 24 Subtotal	**45,953**
District 25	
Jerome ID County	22,374
Twin Falls ID County (part)	23,804
District 25 Subtotal	**46,178**
District 26	
Cassia ID County	22,952
Minidoka ID County	20,069
Twin Falls ID County (part)	3,747
District 26 Subtotal	**46,768**
District 27	
Bannock ID County (part)	38,591
Power ID County	7,817
District 27 Subtotal	**46,408**
District 28	
Bannock ID County (part)	15,488

	Population
District 28 (continued)	
Bear Lake ID County	5,986
Caribou ID County	6,963
Franklin ID County	12,786
Oneida ID County	4,286
District 28 Subtotal	**45,509**
District 29	
Bannock ID County (part)	28,760
Bingham ID County (part)	17,381
District 29 Subtotal	**46,141**
District 30	
Bingham ID County (part)	28,226
Bonneville ID County (part)	15,241
District 30 Subtotal	**43,467**
District 31	
Bonneville ID County (part)	43,369
District 31 Subtotal	**43,369**
District 32	
Bonneville ID County (part)	16,704
Jefferson ID County	26,140
District 32 Subtotal	**42,844**
District 33	
Bonneville ID County (part)	28,920
Fremont ID County (part)	4,861
Teton ID County	10,170
District 33 Subtotal	**43,951**
District 34	
Fremont ID County (part)	8,381
Madison ID County	37,536
District 34 Subtotal	**45,917**
District 35	
Blaine ID County	21,376
Butte ID County	2,891
Camas ID County	1,117
Clark ID County	982
Custer ID County	4,368
Lemhi ID County	7,936

	Population
District 35 (continued)	
Lincoln ID County	5,208
District 35 Subtotal	**43,878**
State Total	**1,567,582**

Plan Name: L82
Plan Type: Current Legislative 35
Administrator: LSO

Political Subdivisions Split Between Districts

Wednesday September 7, 2011 11:07 AM

Number of subdivisions not split:

County	33
Voting Precinct	922

Number of subdivisions split into more than one district:

County	11
Voting Precinct	0

Number of subdivision splits which affect *no* population:

County	0
Voting Precinct	0

Split Counts

County

Cases where an area is split among 2 Districts: 5
Cases where an area is split among 3 Districts: 1
Cases where an area is split among 4 Districts: 3
Cases where an area is split among 6 Districts: 1
Cases where an area is split among 10 Districts: 1

County	Voting Precinct	District	Population
Split Counties :			
Ada ID		9	9,386
Ada ID		14	43,305
Ada ID		15	43,319
Ada ID		16	43,510
Ada ID		17	44,813
Ada ID		18	46,103
Ada ID		19	46,301
Ada ID		20	43,098
Ada ID		21	27,674
Bannock ID		22	44,856
Bannock ID		27	38,591
Bannock ID		28	15,488
Bingham ID		29	28,760
Bingham ID		29	17,381
Bonner ID		30	28,226
		1	34,308

Plan Name:	L82	Administrator:	LSO
Plan Type:	Current Legislative 35	User:	

County	Voting Precinct	District	Population
Split Counties	(continued):		
Bonner ID		2	6,569
Bonneville ID		30	15,241
Bonneville ID		31	43,369
Bonneville ID		32	16,704
Bonneville ID		33	28,920
Canyon ID		8	8,246
Canyon ID		10	32,248
Canyon ID		11	43,550
Canyon ID		12	45,298
Canyon ID		13	43,708
Canyon ID		21	15,873
Fremont ID		33	4,861
Fremont ID		34	8,381
Kootenai ID		2	37,801
Kootenai ID		3	45,009
Kootenai ID		4	45,354
Kootenai ID		5	10,330
Latah ID		5	13,049
Latah ID		6	24,195
Nez Perce ID		6	22,069
Nez Perce ID		7	17,196
Twin Falls ID		23	3,726
Twin Falls ID		24	45,953
Twin Falls ID		25	23,804
Twin Falls ID		26	3,747

Plan: L76
Administrator:

9/7/2011
9:25 a.m.

Population Summary Report

Overall Range:			8.03 Percent	3,595 Persons
Largest District:	46,616	Deviation:	4.08 Percent	1,828 Persons
Smallest District:	43,021	Deviation:	-3.95 Percent	-1,767 Persons
		Mean Deviation:	2.49 Percent	1,115.60 Persons
		Standard Deviation:	1,251	1,250.78 Persons
Ideal District:	44,788			

District	Population	Deviation	% Devn.
1	44,232	-556	-1.24
2	45,410	622	1.39
3	46,499	1,711	3.82
4	46,316	1,528	3.41
5	45,679	891	1.99
6	46,529	1,741	3.89
7	43,086	-1,702	-3.80
8	43,246	-1,542	-3.44
9	45,913	1,125	2.51
10	46,191	1,403	3.13
11	45,999	1,211	2.70
12	45,026	238	0.53
13	45,258	470	1.05
14	43,507	-1,281	-2.86
15	43,380	-1,408	-3.14
16	43,444	-1,344	-3.00
17	43,494	-1,294	-2.89
18	43,305	-1,483	-3.31
19	44,277	-511	-1.14
20	43,149	-1,639	-3.66
21	44,166	-622	-1.39
22	43,643	-1,145	-2.56
23	46,486	1,698	3.79
24	46,260	1,472	3.29
25	45,422	634	1.42
26	43,255	-1,533	-3.42

EXHIBIT D

Plan: L76
Administrator:

9/7/2011
9:25 a.m.

District	Population	Deviation	% Devn.
27	43,165	-1,623	-3.62
28	45,526	738	1.65
29	43,021	-1,767	-3.95
30	45,607	819	1.83
31	45,130	342	0.76
32	44,716	-72	-0.16
33	45,770	982	2.19
34	46,616	1,828	4.08
35	44,859	71	0.16

State Total: **1,567,582**

Plan Components Report

9/7/2011
9:26:18AM

	Population
District 1	
Bonner ID County (part)	33,260
Boundary ID County	10,972
District 1 Subtotal	**44,232**
District 2	
Bonner ID County (part)	7,617
Clearwater ID County	8,761
Idaho ID County	16,267
Shoshone ID County	12,765
District 2 Subtotal	**45,410**
District 3	
Kootenai ID County (part)	46,499
District 3 Subtotal	**46,499**
District 4	
Kootenai ID County (part)	46,316
District 4 Subtotal	**46,316**
District 5	
Kootenai ID County (part)	45,679
District 5 Subtotal	**45,679**
District 6	
Benewah ID County	9,285
Latah ID County	37,244
District 6 Subtotal	**46,529**
District 7	
Lewis ID County	3,821
Nez Perce ID County	39,265
District 7 Subtotal	**43,086**
District 8	
Adams ID County	3,976
Canyon ID County (part)	6,449
Payette ID County	22,623
Washington ID County	10,198

	Population
District 8 Subtotal	**43,246**
District 9	
Boise ID County	7,028
Custer ID County	4,368
Gem ID County	16,719
Lemhi ID County	7,936
Valley ID County	9,862
District 9 Subtotal	**45,913**
District 10	
Canyon ID County (part)	46,191
District 10 Subtotal	**46,191**
District 11	
Canyon ID County (part)	45,999
District 11 Subtotal	**45,999**
District 12	
Canyon ID County (part)	45,026
District 12 Subtotal	**45,026**
District 13	
Canyon ID County (part)	45,258
District 13 Subtotal	**45,258**
District 14	
Ada ID County (part)	43,507
District 14 Subtotal	**43,507**
District 15	
Ada ID County (part)	43,380
District 15 Subtotal	**43,380**
District 16	
Ada ID County (part)	43,444
District 16 Subtotal	**43,444**
District 17	
Ada ID County (part)	43,494
District 17 Subtotal	**43,494**
District 18	
Ada ID County (part)	43,305
District 18 Subtotal	**43,305**
District 19	
Ada ID County (part)	44,277
District 19 Subtotal	**44,277**

	Population
District 20	
Ada ID County (part)	43,149
District 20 Subtotal	**43,149**
District 21	
Ada ID County (part)	44,166
District 21 Subtotal	**44,166**
District 22	
Ada ID County (part)	43,643
District 22 Subtotal	**43,643**
District 23	
Elmore ID County	27,038
Owyhee ID County	11,526
Twin Falls ID County (part)	7,922
District 23 Subtotal	**46,486**
District 24	
Jerome ID County	22,374
Twin Falls ID County (part)	23,886
District 24 Subtotal	**46,260**
District 25	
Twin Falls ID County (part)	45,422
District 25 Subtotal	**45,422**
District 26	
Butte ID County	2,891
Clark ID County	982
Fremont ID County	13,242
Jefferson ID County	26,140
District 26 Subtotal	**43,255**
District 27	
Blaine ID County	21,376
Camas ID County	1,117
Gooding ID County	15,464
Lincoln ID County	5,208
District 27 Subtotal	**43,165**
District 28	
Bannock ID County (part)	37,709
Power ID County	7,817
District 28 Subtotal	**45,526**
District 29	

	Population
District 29 (continued)	
Cassia ID County	22,952
Minidoka ID County	20,069
District 29 Subtotal	**43,021**
District 30	
Bingham ID County	45,607
District 30 Subtotal	**45,607**
District 31	
Bannock ID County (part)	45,130
District 31 Subtotal	**45,130**
District 32	
Bear Lake ID County	5,986
Bonneville ID County (part)	4,525
Caribou ID County	6,963
Franklin ID County	12,786
Oneida ID County	4,286
Teton ID County	10,170
District 32 Subtotal	**44,716**
District 33	
Bonneville ID County (part)	45,770
District 33 Subtotal	**45,770**
District 34	
Bonneville ID County (part)	9,080
Madison ID County	37,536
District 34 Subtotal	**46,616**
District 35	
Bonneville ID County (part)	44,859
District 35 Subtotal	**44,859**
State Total	**1,567,582**

Plan: L76
Administrator:

9/7/2011
9:24 a.m.

Political Subdivisions Split Between Districts

Number of subdivisions split into more than one district:

County	7
Voting Precinct	55

Number of times a subdivision is split into more than one district:

County	21
Voting Precinct	69

Number of splits involving no population:

County	0
Voting Precinct	8

County	Voting Precinct	District	Population
Split Counties:			
Ada ID		14	43,507
Ada ID		15	43,380
Ada ID		16	43,444
Ada ID		17	43,494
Ada ID		18	43,305
Ada ID		19	44,277
Ada ID		20	43,149
Ada ID		21	44,166
Ada ID		22	43,643
Bannock ID		28	37,709
Bannock ID		31	45,130
Bonner ID		1	33,260
Bonner ID		2	7,617
Bonneville ID		32	4,525
Bonneville ID		33	45,770
Bonneville ID		34	9,080
Bonneville ID		35	44,859
Canyon ID		8	6,449
Canyon ID		10	46,191
Canyon ID		11	45,999
Canyon ID		12	45,026
Canyon ID		13	45,258
Kootenai ID		3	46,499
Kootenai ID		4	46,316
Kootenai ID		5	45,679
Twin Falls ID		23	7,922
Twin Falls ID		24	23,886
Twin Falls ID		25	45,422
Split VTDs:			

County	Voting Precinct	District	Population
Ada ID	100	18	324
Ada ID	100	19	376
Ada ID	100	22	1,774
Ada ID	101	21	35
Ada ID	101	22	1,728
Ada ID	103	19	1,427
Ada ID	103	22	0
Ada ID	107	19	2,427
Ada ID	107	22	7
Ada ID	109	17	831
Ada ID	109	21	4,569
Ada ID	124	17	1,853
Ada ID	124	22	3,175
Ada ID	127	14	2,399
Ada ID	127	20	219
Ada ID	129	14	1,553
Ada ID	129	15	1,337
Ada ID	31	15	1,484
Ada ID	31	16	1,879
Ada ID	33	15	3,130
Ada ID	33	18	735
Ada ID	39	18	2,111
Ada ID	39	19	104
Ada ID	40	18	156
Ada ID	40	19	1,061
Ada ID	5	14	2,027
Ada ID	5	20	0
Ada ID	55	15	0
Ada ID	55	16	1,776
Ada ID	55	18	580
Ada ID	56	16	1,286
Ada ID	56	18	1,131
Ada ID	60	18	2,524
Ada ID	60	19	587
Ada ID	71	18	1,640
Ada ID	71	19	0
Ada ID	74	19	3,274
Ada ID	74	22	17
Ada ID	79	16	0
Ada ID	79	21	1,268
Ada ID	81	18	892
Ada ID	81	21	1,717
Ada ID	82	18	657
Ada ID	82	21	1,813
Ada ID	97	18	265
Ada ID	97	22	2,166
Ada ID	98	18	203
Ada ID	98	22	2,550
Ada ID	99	18	318

County	Voting Precinct	District	Population
Ada ID	99	22	2,885
Bonneville ID	51	32	545
Bonneville ID	51	33	2,109
Bonneville ID	58	32	3,190
Bonneville ID	58	33	210
Bonneville ID	58	34	121
Canyon ID	03	12	10
Canyon ID	03	13	3,075
Canyon ID	05	10	846
Canyon ID	05	11	1,551
Canyon ID	12	10	2,108
Canyon ID	12	11	1,572
Canyon ID	13	10	7,470
Canyon ID	13	11	795
Canyon ID	18	8	931
Canyon ID	18	11	2,319
Canyon ID	20	10	89
Canyon ID	20	11	165
Canyon ID	20	12	2,258
Canyon ID	20	13	1,862
Canyon ID	22	10	384
Canyon ID	22	11	969
Canyon ID	27	10	3,606
Canyon ID	27	11	4,133
Canyon ID	27	12	0
Canyon ID	29	8	622
Canyon ID	29	11	6,161
Canyon ID	35	12	2,312
Canyon ID	35	13	1,851
Canyon ID	38	10	0
Canyon ID	38	12	945
Canyon ID	38	13	5,112
Canyon ID	40	12	2,570
Canyon ID	40	13	3,906
Canyon ID	41	12	195
Canyon ID	41	13	2,745
Canyon ID	43	10	2,070
Canyon ID	43	12	1,120
Canyon ID	44	12	2,083
Canyon ID	44	13	705
Canyon ID	46	10	3,682
Canyon ID	46	12	1,708
Canyon ID	49	10	427
Canyon ID	49	12	3,959
Canyon ID	50	10	610
Canyon ID	50	12	3,730
Canyon ID	51	8	2,835
Canyon ID	51	11	0
Canyon ID	55	10	901

Plan: L76
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County	Voting Precinct	District	Population
Canyon ID	55	11	414
Canyon ID	56	8	2,061
Canyon ID	56	11	2,443
Canyon ID	60	12	1,128
Canyon ID	60	13	1,419
Kootenai ID	20	3	1,131
Kootenai ID	20	4	1,857
Kootenai ID	28	4	995
Kootenai ID	28	5	3,049
Kootenai ID	34	4	1,153
Kootenai ID	34	5	1,337
Kootenai ID	36	4	1,429
Kootenai ID	36	5	829
Kootenai ID	46	3	1,323
Kootenai ID	46	4	1,194
Kootenai ID	48	3	79
Kootenai ID	48	4	1,152
Kootenai ID	48	5	482
Kootenai ID	54	4	1,958
Kootenai ID	54	5	2
Kootenai ID	57	4	772
Kootenai ID	57	5	801
Kootenai ID	8	3	358
Kootenai ID	8	5	3,202
Twin Falls ID	Buhl 2	23	928
Twin Falls ID	Buhl 2	25	411
Twin Falls ID	Buhl 3	23	174
Twin Falls ID	Buhl 3	25	767
Twin Falls ID	Twin Falls 12	24	980
Twin Falls ID	Twin Falls 12	25	192
Twin Falls ID	Twin Falls 15	24	1,290
Twin Falls ID	Twin Falls 15	25	2,162

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Email: ctroupis@troupislaw.com

Attorney for Petitioners

IN THE SUPREME COURT OF THE STATE OF IDAHO

BENEWAH COUNTY, a political subdivision of the State of Idaho, and the **BOARD OF BENEWAH COUNTY COMMISSIONERS; BONNER COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF COMMISSIONERS OF BONNER COUNTY**, a political subdivision of the State of Idaho; **BOUNDARY COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF BOUNDARY COUNTY**; **CLEARWATER COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF CLEARWATER COMMISSIONERS; IDAHO COUNTY**, a political subdivision of the State if Idaho, and the **BOARD OF IDAHO COUNTY COMMISSIONERS; LEWIS COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF LEWIS COUNTY COMMISSIONERS; SHOSHONE COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF SHOSHONE COUNTY COMMISSIONERS**; and **CITIZENS FOR EQUITABLE REDISTRICTING**, an Idaho nonprofit Association, Petitioners, vs.	**CASE NO.** **AFFIDAVIT OF HONORABLE LAWERENCE DENNEY, SPEAKER OF THE IDAHO HOUSE OF REPRESENTATIVES**

IDAHO COMMISSION ON REDISTRICTING and **BEN YSURSA**
Secretary of State of the State of Idaho

Respondents.

State of Idaho)
) ss.
County of Ada)

Lawerence Denney, being first duly sworn, deposes and states:

1. I am the Idaho State Representative for District 9, House Seat A, and serve as the Speaker of the Idaho House of Representatives. Each of the matters set forth herein are known to me of my own personal knowledge and if sworn as a witness in this matter, I could testify competently thereto.

2. I was a legislative co-sponsor of Senate Bill 1184 enacted into law in the 2009 session of the Idaho Legislature. The original language of the statute, Idaho Code §72-1502(3) stated:

   "A person who has served on a commission for reapportionment shall be precluded from serving in either house of the legislature for five (5) years following such service on the commission..."

3. Senate Bill 1184 amended that section of Idaho Code §72-1502(3) by the addition of the following language:

   "...[a]nd shall be precluded from serving on a future commission for reapportionment unless the commission is reconstituted because a court of competent jurisdiction has invalidated a plan of the commission and the commission is required to meet to complete a reapportionment or redistricting plan. This limitation on serving on a future commission for reapportionment shall apply on and after January 1, 2001."

4. The legislative intent of the addition of this provision in Idaho Code §72-1502 was to prohibit persons who sat on the Commission and adopted a plan of reapportionment from subsequently serving in the legislature in the following five (5) years because they would have had the ability to influence the configuration of the district in which they would run for election. The legislature did not intend to prevent appointed commissioners from serving on a future commission when, as occurred this year, the commission failed to adopt a plan, or to prevent those commissioners from continuing their service until a plan was adopted.

5. When the first Idaho Redistricting Commission appointed in 2011 failed to adopt a plan, this Court ruled that it had no authority to order the commission to reconvene or to extend its duration because it had not adopted a plan, and a new Commission was organized. The members of the original Commission were precluded from serving on the new Commission. That preclusion was contrary to the legislative intent of our amendment of Idaho Code §72-1502, and the authority granted to party leaders under Article III §2(2) of the Idaho Constitution to select members of the Commission.

6. Consistent with the legislative intent of Idaho Code §72-1502, if this Court orders the commission to be reconvened, that Commission should be comprised of the original appointed members, or an entirely new Commission should be organized, and the original members of the Commission should be eligible for appointment to that Commission.

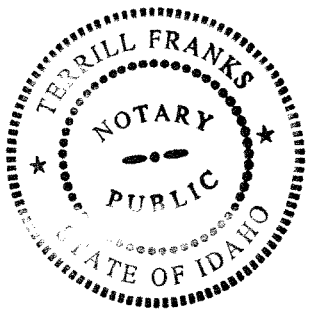
FURTHER, AFFIANT SAYETH NOT.

Dated: December 1, 2011

Lawerence Denney

State of Idaho)
) ss.
County of Ada)

Subscribed and sworn to before me, a Notary Public in and for the State of Idaho and County of Ada on this 1st day of December, 2011.



Terrill Franks
Notary Public Boise ID
Residing at: 8-28-2016
My commission expires:

Christ T. Troupis, ISB # 4549
TROUPIS LAW OFFICE
1299 E. Iron Eagle, Ste 130
PO Box 2408
Eagle, Idaho 83616
Telephone: 208/ 938-5584
Facsimile: 208/ 938-5482
Email: ctroupis@troupislaw.com

Attorney for Petitioners

Co-Counsel also representing their respective counties
Douglas Payne, Benewah County Prosecutor
Louis E. Marshall, Bonner County Prosecutor
Jack Douglas, Boundary County Prosecutor
E. Clayne Tyler, Clearwater County Prosecutor
Kirk MacGregor, Idaho County Prosecutor
Kimron Torgerson, Lewis County Prosecutor
Val Siegel, Shoshone County Prosecutor

IN THE SUPREME COURT OF THE STATE OF IDAHO

BENEWAH COUNTY, a political subdivision of the State of Idaho, and the **BOARD OF BENEWAH COUNTY COMMISSIONERS; BONNER COUNTY,** a political subdivision of the State of Idaho, and the **BOARD OF COMMISSIONERS OF BONNER COUNTY**, a political subdivision of the State of Idaho; **BOUNDARY COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF BOUNDARY COUNTY; CLEARWATER COUNTY**, a political subdivision of the State of Idaho, and the **BOARD OF CLEARWATER COMMISSIONERS; IDAHO COUNTY,** a political subdivision of the State if Idaho, and the **BOARD OF IDAHO COUNTY COMMISSIONERS; LEWIS COUNTY,** a political subdivision of the State of Idaho, and the **BOARD OF LEWIS COUNTY COMMISSIONERS; SHOSHONE COUNTY**, a political subdivision of the	)	**CASE NO.** **AFFIDAVIT OF LOU ESPOSITO**

State of Idaho, and the **BOARD OF SHOSHONE COUNTY COMMISSIONERS**; and **CITIZENS FOR EQUITABLE REDISTRICTING**, an Idaho nonprofit Association,

Petitioners,

vs.

IDAHO COMMISSION ON REDISTRICTING and **BEN YSURSA**, Secretary of State of the State of Idaho

Respondents.

State of Idaho)
) ss.
County of Ada)

Lou Esposito, being first duly sworn, deposes and states:

1. I was a member of the 2011 Idaho Redistricting Commission. Each of the matters set forth herein are known to me of my own personal knowledge and if sworn as a witness in this matter, I could testify competently thereto.

2. I worked extensively in the preparation and presentation of reapportionment plans and the review of other plans presented during the working sessions of the 2011 Idaho Redistricting Commission. I heard and reviewed all of the oral and written testimony presented to the Commission. As a result of that work, I am well aware of the Constitutional infirmities of plans proposed to the Commission in 2011, including plans that had all of the same components as the adopted plan, L87, and the difficulties of formulating a plan that meets not only the "minimum county split" requirement of the Idaho Constitution, but also the statutory requirements of Idaho Code §72-1506.

3. I have reviewed the Plan adopted by the second Commission, Plan L87. It violates virtually every statutory requirement of Idaho Code §72-1506. In particular, it divides

counties in ways that are unnecessary to comply with the Idaho Constitution and statutes. and appear to be gerrymandered.

a. The Letha precinct is carved out of District 8 and put into District 9, separating it from the rest of Gem County, approximately 90% of which is in District 8. As a county of 16,719 people, there was no reason to split Gem County.

b. In Owyhee County, the eastern portion is carved out of District 11 and put into District 23, separating it from the rest of Owyhee County, approximately 62% of which is in District 11. As a county of 11,526 people, there was no reason to split Owyhee County.

c. A portion of the Tetonia precinct (Precinct #4) is carved out of District 32 and put into District 34, separating it from the rest of Teton County, approximately 85% of which is in District 32. As a county of 10,170 people, there was no reason to split Teton County.

4. The only reason that District 25 could have been drawn as it was in Plan L87, which resulted in a population deviation of -5.25%, the lowest population deviation in any plan seriously considered at any time by either Commission, was that it was drawn for the purpose of gerrymandering the district to protect incumbents.

5. The L-76 "minimum trans-county district splits" plan splits 5 counties, but also minimizes the number of trans-county districts (7), resulting in total population deviation of 8.03%. The L-76 plan was the only plan presented to the Commission that fully complied with the minimum county split and minimum trans-county district split requirements of the Idaho Constitution. It is the only way that this can be

accomplished. There are no other plans that could be drawn that would meet these requirements, and therefore, if this is the only criteria to be followed, the Court should adopt this plan.

6. The Democrat members of the original Commission argued that the only applicable criteria to be followed by the Commission was the Idaho Constitution's requirement that any proposed legislative district plan split the least number of counties. Thus, the only plans they proposed ignored the statutory criteria and dealt exclusively with this minimum county split requirement as the sole applicable criteria. The Democrat members of the Commission proposed a minimum county split plan that split five (5) counties, but resulted in a greater population deviation than the Republican minimum county split plan. Although they initially argued that the rationale for this plan was the constitutional requirement of minimal county splits, they admitted that their actual goal in proposing this plan was to protect Democrat incumbents and build additional Democrat districts in violation of Idaho Code §72-1506(8). Attached hereto, marked Exhibit A, and incorporated herein by reference, is a true and accurate copy of the Democrat's proposed partial plan for legislative apportionment protecting their incumbents.

7. If the Democrat plan, Exhibit A, is overlaid on Plan L87, Exhibit B hereto, it matches perfectly in all of the northern Idaho Districts, in Ada County, Twin Falls County, Blaine, Camas, Gooding and Lincoln Counties, and with minor and insignificant variation in Bannock and Bingham Counties (it adds Oneida, but with its 4,286 population, does not make a meaningful difference in outcomes).

8. Choosing to follow only the minimum county split requirement versus all of the Idaho Constitutional and Statutory requirements yields radically different results in formulation of legislative districts and disenfranchises a wide swath of Idaho voters. Plan L-82 follows all of these requirements. The Commission received substantial testimony in Sandpoint, Coeur d'Alene, Moscow, Lewiston, Rexburg, Idaho Falls, Pocatello, and Soda Springs that entire groups of voters in all of those communities were disenfranchised under the 2002 Legislative District Plan precisely because it failed to take into account communities of interest and connecting roads that are a key element in creating communities of interest. This testimony is equally applicable to Plan L87, which is actually worse than the 2002 Legislative District Plan, because it not only disenfranchised voters in the communities listed above in the same manner as the 2002 plan, but disenfranchises voters in Owyhee County and Gem County as well.

FURTHER, AFFIANT SAYETH NOT.

Dated: December 2, 2011

Lou Esposito

State of Idaho)
) ss.
County of Ada)

Subscribed and sworn to before me, a Notary Public in and for the State of Idaho and County of Ada on this 2nd day of December, 2011.

Notary Public
My commission expires:

Red and White

ator Date Modified September 5, 2011 10:03:28

EXHIBIT A

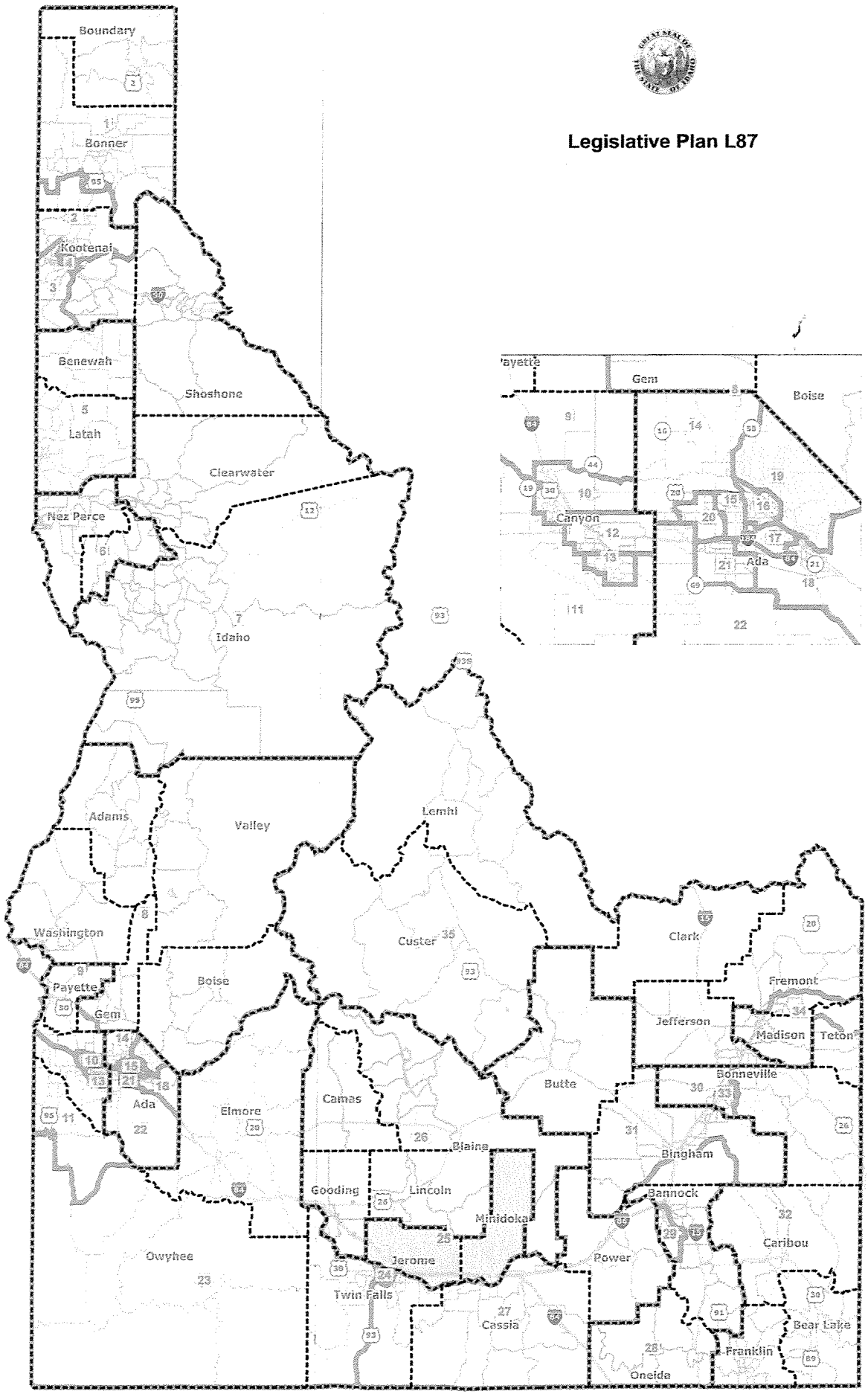

Legislative Plan L87
Boundary
Bonner
Kootenai
Benewah
Shoshone
Latah
Clearwater
Nez Perce
Idaho
Lemhi
Adams
Valley
Washington
Payette
Gem
Boise
Ada
Canyon
Custer
Elmore
Camas
Blaine
Gooding
Lincoln
Minidoka
Jerome
Twin Falls
Owyhee
Cassia
Power
Butte
Clark
Fremont
Jefferson
Madison
Teton
Bonneville
Bingham
Bannock
Caribou
Oneida
Franklin
Bear Lake

EXHIBIT B