STATE OF WISCONSIN

IN SUPREME COURT

Case No. 2021AP1450-OA

BILLIE JOHNSON, ERIC O'KEEFE, ED PERKINS AND RONALD ZAHN,

Petitioners,

BLACK LEADERS ORGANIZING FOR COMMUNITIES, VOCES DE LA FRONTERA, LEAGUE OF WOMEN VOTERS OF WISCONSIN, CINDY FALLONA, LAUREN STEPHENSON, REBECCA ALWIN, CONGRESSMAN GLENN GROTHMAN, CONGRESSMAN BRYAN STEIL, CONGRESSMAN TOM TIFFANY, CONGRESSMAN SCOTT FITZGERALD, LISA HUNTER, JACOB ZABEL, JENNIFER OH, JOHN PERSA, GERALDINE SCHERTZ, KATHLEEN QUALHEIM, GARY KRENZ, SARAH J. HAMILTON, STEPHEN JOSEPH WRIGHT, JEAN-LUC THIFFEAULT, and SOMESH JHA,

Intervenors-Petitioners,

v.

WISCONSIN ELECTIONS COMMISSION, MARGE BOSTELMANN in her official capacity as a member of the Wisconsin Elections Commission, JULIE GLANCEY in her official capacity as a member of the Wisconsin Elections Commission, ANN JACOBS in her official capacity as a member of the Wisconsin Elections Commission, DEAN KNUDSON in his official capacity as a member of the Wisconsin Elections Commission, ROBERT SPINDELL, JR. in his official capacity as

a member of the Wisconsin Elections Commission and MARK THOMSEN in his official capacity as a member of the Wisconsin Elections Commission,

Respondents,

THE WISCONSIN LEGISLATURE, GOVERNOR TONY EVERS, in his official capacity, and JANET BEWLEY Senate Democratic Minority Leader, on behalf of the Senate Democratic Caucus,

Intervenors-Respondents.

ORIGINAL ACTION

GOVERNOR TONY EVERS'S BRIEF IN SUPPORT OF PROPOSED MAPS

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TABLE OF CONTENTS

INTRODUCTION 6

BACKGROUND 7

ARGUMENT 8

I. The maps meet or exceed the Court's required "least changes" approach and perform better than what the Legislature passed. 9

II. The maps properly apply federal law. 11

A. The maps properly apply one-person-one-vote principles. 11

B. The proposed maps comply with the Voting Rights Act. 12

III. The maps properly apply state law. 15

A. The proposed maps are compact. 15

B. The proposed maps comply with the remaining state-law requirements. 17

C. The Governor's plans comply with other traditional criteria consistent with a "least changes" approach. 18

CONCLUSION 20

TABLE OF AUTHORITIES

Cases

Abrams v. Johnson,
521 U.S. 74 (1997) 11

Baldus v. Members of Wis. Gov't Accountability Bd.,
849 F. Supp. 2d 840 (E.D. Wis. 2012)..... 13, 14

Baldus v. Members of Wisconsin Gov't Accountability Bd.,
862 F. Supp. 2d 860 (E.D. Wis. 2012)..... 14

Bartlett v. Strickland,
556 U.S. 1 (2009) 13

Baumgart v. Wendelberger,
No. 01-C-0121, 2002 WL 34127471
(E.D. Wis. May 30, 2002)..... 9, 11, 12

Cooper v. Harris,
137 S. Ct. 1455 (2017) 13

Evenwel v. Abbott,
578 U.S. 54, 136 S. Ct. 1120 (2016) 11, 12

Johnson v. De Grandy,
512 U.S. 997 (1994) 13

Karcher v. Daggett,
462 U.S. 725 (1983) 18

Prosser v. Elections Bd.,
793 F. Supp. 859 (W.D. Wis. 1992)..... 11, 12, 18

Reynolds v. Sims,
377 U.S. 533 (1964) 11

State ex rel. Reynolds v. Zimmerman,
22 Wis. 2d 544, 126 N.W.2d 551 (1964)..... 7

Whitford v. Gill,
218 F. Supp. 3d 837 (W.D. Wis. 2016) 18

Wisconsin State AFL-CIO v. Elections Bd.,
543 F. Supp. 630 (E.D. Wis. 1982) 11, 15

Consitutional Provisions

Wis. Const. art. IV, § 4 ..... 15, 17

Wis. Const. art. IV, § 5 ..... 16, 17

Statutes

52 U.S.C. § 10301(a) 12

52 U.S.C. § 10301(b) 13

Wis. Stat. § 4.001 17

Other Authorities

2021 Senate Bill 621 9

2021 Senate Bill 622 9

INTRODUCTION

Governor Tony Evers submits this brief in support of his accompanying proposed maps.[1] Those proposals account for the requirements in this Court's November 30, 2021, decision, including the "least-changes" approach that this Court mandated. In fact, the maps proposed here perform better on that requirement than the maps that the Legislature recently passed. They also satisfy the other legal criteria stated in the Court's order, including the one-person-one-vote and Voting Rights Act requirements under federal law and Wisconsin's compactness requirement. Further, the proposed maps perform well on other traditional redistricting criteria.

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[1] The proposed maps are available at the following links:

- The Assembly map is available at https://www.google.com/maps/d/edit?mid=1fPl8On9q8ZyTa6A1V3CJDzry3YR_pGNt&usp=sharing
- The Senate map is available at https://www.google.com/maps/d/edit?mid=16pQAubyKxYn-7qSF8Lu5RHTm8DsOlJdV&usp=sharing
- The congressional map is available at https://www.google.com/maps/d/edit?mid=10H4O7oyvGSgks0eS2-nppEzh-L4d1Vmk&usp=sharing

The detailed data for the maps are available at this hyperlink, or at https://perma.cc/JP84-CN48. That link provides the Excel CSV files for the maps, which contain census blocks and the assigned Districts and can be loaded into mapping software to reproduce the maps. Also included are the corresponding Shapefiles. Partial map reproductions are attached to this brief for reference, but they do not contain the detail of the above links. If additional reproductions would be useful, they will be supplied if the Court so requests.

As this Court has recognized, it is the Governor who most squarely represents the people's interests in redistricting: he is "the one institution guaranteed to represent the majority of the voting inhabitants of the state." *State ex rel. Reynolds v. Zimmerman*, 22 Wis. 2d 544, 556–57, 126 N.W.2d 551 (1964). In service of that principle, the Governor, by executive order, created the People's Maps Commission to draw nonpartisan maps for the present redistricting. For almost a year, the Commission collected information relevant to drawing the new maps, heard from thousands of Wisconsinites, and then applied neutral criteria to draw fair maps. However, because those maps were not drawn with a "least changes" approach, they are foreclosed from meaningful consideration based on this Court's November 30th order.

Instead, the Governor submits the maps proposed here as best meeting this Court's criteria. Those proposals meet or exceed what is required by the Court's November 30th order, and so should be adopted.

BACKGROUND

The Court is tasked with drawing Wisconsin's new state legislative and federal congressional maps following the 2020 census, given the impasse between the Legislature and Governor. In a November 30, 2021, decision, the Court ruled on what it would consider, and would not consider, when reviewing proposed maps for adoption.

The Court's order reiterated the federal Equal Protection principle known as one-person-one-vote. For congressional plans, that requires the maps contain nearly absolute population equality. *Johnson v. Wisconsin Elections Commission*, 2021AP1450-OA, Nov. 30, 2021, Opinion ¶ 25. (hereinafter "Op."). For state legislative maps, the one-

person-one-vote requirement likewise applies but may be "less exacting." Op. ¶ 26. In addition, under the federal Voting Rights Act, maps may not abridge the right to vote for minority groups. Op. ¶ 27.

Under Wisconsin law, the Court pointed to a similar principle of equal apportionment in the Wisconsin Constitution. Op. ¶ 28. And the Court identified the Wisconsin Constitution's article IV, § 4, which provides that districts should "be bounded by county, precinct, town or ward lines," "consist of contiguous territory," and be "in as compact form as practicable." Op. ¶¶ 35, 37. However, the Court explained that the one-person-one-vote requirement meant that splits may at times occur, especially as to counties. Op. ¶ 35.

The Court's order also included rulings regarding the consideration of partisanship and a concept dubbed the "least changes" approach. The Court ruled that it would not consider the "partisan makeup" or "partisan fairness" of districts. Op. ¶ 39; Op. ¶ 82 n.4 (Hagedorn, J., concurring). Further, it ruled that any proposed maps must follow a "least-change" approach to the existing maps. Op. ¶ 64; Op. ¶ 87 (Hagedorn, J., concurring). While stating that "least-changes" was the "primary concern," the concurring Justices explained that the map-drawing also could consider "other traditional redistricting criteria" as part of a "weighing process." Op. ¶¶ 83, 87 & n.6 (Hagedorn, J., concurring) (citation omitted).

ARGUMENT

This Court should adopt the proposed maps accompanying this brief, as they meet or exceed the criteria required by the Court's November 30th order. In fact, they perform better on the "primary concern" of the Court's decision—the "least changes" approach—than what the

Legislature recently passed. The maps also satisfy federal and state law requirements and perform well on other traditional criteria.

In support of the plans, the Governor submits an expert report from Dr. Jeanne Nielsen Clelland, Ph.D, a Professor in the Department of Mathematics at the University of Colorado Boulder, cited as "Clelland Rep." Dr. Clelland's research focuses on mathematical analysis of redistricting.

I. The maps meet or exceed the Court's required "least changes" approach and perform better than what the Legislature passed.

The maps proposed here meet or exceed the "least-changes" approach required by this Court's November 30th order. The Court stated that a "least-changes" approach refers to making only "necessary" changes to the "existing maps." Op. ¶ 64. The plurality reiterated that this approach was the Court's "primary concern." Op. ¶ 87 (Hagedorn, J., concurring). The maps presented here satisfy that concern and do so better than what the Legislature passed in 2021 Senate Bills 621 and 622.[2] In fact, here, 13 Assembly districts have not been changed at all.

The concept of "core retention" is commonly understood to mean a measure "of retaining previous occupants in new legislative districts." *Baumgart v. Wendelberger*, No. 01-C-0121, 2002 WL 34127471, at *3 (E.D. Wis. May 30, 2002). In other words, it refers to keeping voters where they already are located, thus making the "least changes."

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[2] *See* 2021 Assembly Joint Resolution 80, Wis. State Legislature, https://docs.legis.wisconsin.gov/2021/related/proposals/ajr80 (last visited Dec. 15, 2021).

The Governor's proposed Assembly and Senate maps have a very high retention rate. In the Assembly, only 14.21% of the population moves to a different district. (Clelland Rep. 2–3, 8.) By way of comparison, SB 621 moved 15.84% of the population. (*Id.*) In the Governor's Senate plan, 7.83% of the population moves, while SB 621 moved a negligibly different 7.79% of the population. (*Id.*)

And in the proposed congressional map, the Governor's plan moves only 5.50% of the population. (Clelland Rep. 3, 8.) This compares with 5.62% in the plan the Legislature passed in SB 622. (*Id.*)

These figures are especially notable because it is the Legislature that advocated for adoption of the "least-changes" approach as the governing principle in this redistricting. The maps proposed here exceed what the Legislature passed applying that metric. As that is the "primary concern" before the Court, this should weigh heavily in favor of adopting the maps proposed here. *See* Op. ¶ 87 (Hagedorn, J., concurring).

Not only do the proposals here perform better on the "least-changes" measure, but the Assembly map actually makes *no* changes to 13 districts: Districts 1, 27, 28, 32, 43, 52, 58, 60, 61, 63, 74, 91, and 92. (Clelland Rep. 3, 8.) By contrast, the Assembly map passed by the Legislature left no district unchanged.

In sum, the maps satisfy this Court's "least-changes" directive and do so better than the maps passed by the Legislature. And in 13 Assembly districts, the maps exceed "least-changes" by making *no* changes. The maps thus should be adopted under the framework stated in the November 30th opinion.

II. The maps properly apply federal law.

A. The maps properly apply one-person-one-vote principles.

The U.S. Constitution requires that apportionment be as equal as practicable: "To prevent the debasement of citizens' voting power and to honor the dictates of the Equal Protection Clause, equality of population, to the extent it is practicable, is the cornerstone of any constitutional apportionment plan." *Wisconsin State AFL-CIO v. Elections Bd.*, 543 F. Supp. 630, 633 (E.D. Wis. 1982) (applying *Reynolds v. Sims*, 377 U.S. 533 (1964)). However, some deviations from a strict population standard may be allowed to account for redistricting criteria. *Baumgart*, 2002 WL 34127471, at *3. Maps ordered into effect by courts are "held to higher standards of population equality" than maps enacted into law by legislatures. *Abrams v. Johnson*, 521 U.S. 74, 98 (1997).

The standard of one-person-one-vote is typically applied somewhat differently for congressional maps versus state legislative ones. For congressional maps, courts generally require nearly perfect equality. *Evenwel v. Abbott*, 578 U.S. 54, 136 S. Ct. 1120, 1124 (2016). Minor deviations are allowed for state legislative maps; but, where court-drawn, those deviations must be minimal. *See Abrams*, 521 U.S. at 98. For example, the state legislative maps drawn by the federal courts in Wisconsin have had population deviations of under 2% or even lower. *E.g.*, *Baumgart*, 2002 WL 34127471, at *7 ("The court's plan embodies a maximum population deviation of 1.48%."); *Prosser v. Elections Bd.*, 793 F. Supp. 859, 870 (W.D. Wis. 1992) ("The court plan's total deviation from exact population equality is .52 percent.").

Here, based on the 2020 Census, the ideal population for each of Wisconsin's 99 Assembly districts is 59,533 persons. The ideal population for each of Wisconsin's 33 Senate districts is 178,598 persons. And the ideal population for each of Wisconsin's eight congressional districts is 736,715 persons. (Stipulations 29–32.) The plans proposed by the Governor offer de minimus deviations for each of those maps, consistent with the criteria summarized above.

For the Assembly, the proposed plan has a mean deviation of 0.47% from the ideal district, with maximum deviation of 0.98% from ideal, meaning all districts are within 1.0% of ideal. (Clelland Rep. 2, 7.) For the Senate, the map has a mean deviation of 0.25% and maximum deviation of 0.62%. (*Id.*) And for Congress, the map has a maximum deviation of one person. (*Id.*)

The state-map deviations are well within the range of deviations permitted for court-drawn maps and are consistent with the deviations in the recent court-drawn examples above. *See Baumgart*, 2002 WL 34127471, at *7; *Prosser*, 793 F. Supp. at 870. And the congressional map has nearly perfect equality, as required. *See Evenwel*, 136 S. Ct. at 1124. Thus, the maps comply with the one-person-one vote requirement.

B. The proposed maps comply with the Voting Rights Act.

The federal Voting Rights Act forbids a "standard, practice, or procedure . . . which results in a denial or abridgement of the right of any citizen of the United States to vote on account of race or color." 52 U.S.C. § 10301(a). A violation may be established "if, based on the totality of circumstances, it is shown that the political processes . . . are not equally open to participation by members of a class of citizens protected by subsection (a) in that its members have

less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice." 52 U.S.C. § 10301(b).

This may apply to "vote dilution" through "dispersal of [a group's members] into districts in which they constitute an ineffective minority of voters." *Cooper v. Harris*, 137 S. Ct. 1455, 1464 (2017) (alteration in original) (citation omitted). However, a violation can also occur "by packing [a group's voters] into one or a small number of districts to minimize their influence in the districts next door." *Johnson v. De Grandy*, 512 U.S. 997, 1007 (1994).

For a vote dilution claim, a court considers whether "(1) the minority groups are sufficiently large and geographically compact to create a majority-minority district; (2) the minority groups are politically cohesive in terms of voting patterns; and (3) voting is racially polarized, such that the majority group can block a minority's candidate from winning." *Baldus v. Members of Wis. Gov't Accountability Bd.*, 849 F. Supp. 2d 840, 854 (E.D. Wis. 2012). Such claims may require the creation of majority-minority districts. *Bartlett v. Strickland*, 556 U.S. 1, 13 (2009). "In majority-minority districts, a minority group composes a numerical, working majority of the voting-age population." *Id.*

It has long been recognized that, in Milwaukee, the Voting Rights Act requires the drawing of majority-minority districts. As the previous maps reflect, the existence of Milwaukee's large and compact minority groups and history of polarized voting is well established. *See*, *e.g.*, *Baldus*, 849 F. Supp. 2d at 855 (explaining agreement that Milwaukee's Hispanic vote satisfied the factors, including that it is sufficiently large and compact, that there is cohesiveness, and that there is polarization); Special Report, *Democratic, Republican voters worlds apart in divided Wisconsin*,

Milwaukee Journal Sentinel (discussing the concentration of Black communities and segregation in Milwaukee and its history of polarized voting).[3]

For example, those standards were applied by the *Baldus* court when it ordered the redrawing of two Assembly districts in Milwaukee—Districts 8 and 9—under the last Wisconsin plan. *Baldus v. Members of Wisconsin Gov't Accountability Bd.*, 862 F. Supp. 2d 860, 861 (E.D. Wis. 2012). The panel adopted "a new Assembly District 8 with a Hispanic Citizen Voting Age Population (HCVAP) of 55.22% and a new Assembly District 9 with 34.78% HCVAP." *Id.* at 862. With those changes, the previous Assembly plan had six majority-minority Black districts and one majority-minority Hispanic district. *Baldus v. Members of Wisconsin Gov't Accountability Bd.*, 849 F. Supp. 2d 840, 848 (E.D. Wis. 2012). The previous Senate plan had two majority-minority Black districts and no majority-minority Hispanic districts.

Now, with population changes since 2010, there is a sufficiently large and compact population of Black residents to produce seven majority Black districts in the Assembly. *See Baldus*, 849 F. Supp. 2d at 854 (stating the Act's criteria). The Governor's plan thus creates seven majority Black districts based on voting age population of those who identified as Black, either alone or in combination with another race. That adds one majority-minority Black district to the prior map (Districts 10, 11, 12, 14, 16, 17, and 18). (Clelland Rep. 4, 11.) These districts all have non-white voting age populations between 58.81% and 65.15%. (Clelland Rep. 10.)

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[3] Available at https://archive.jsonline.com/news/statepolitics/democratic-republican-voters-worlds-apart-in-divided-wisconsin-b99249564z1-255883361.html.

And the Governor's Assembly plan has two majority-Hispanic voting age population districts (Districts 8 and 9), which maintains percentages similar to those in ordered in *Baldus*. (Clelland Rep. 5, 11.) It also maintains the previous Senate map, with two majority-minority Black districts (Districts 4 and 6) and no majority-minority Hispanic districts. (Clelland Rep. 11.)

In sum, the maps comply with the Voting Rights Act, as they expand the influence of minority groups beyond what was in the prior map in response to the current population counts, and otherwise maintain the Act-compliant districts consistent with prior federal litigation.

III. The maps properly apply state law.

A. The proposed maps are compact.

The Wisconsin Constitution requires that Assembly districts be in "as compact form as practicable." Wis. Const. art. IV, § 4. Courts understand compactness to mean "closely united in territory." *Wisconsin State AFL-CIO*, 543 F. Supp. at 634. While the constitution proscribes no single way to measure compactness, certain measures are recognized as relevant to compactness.

For example, the "Reock" and "Polsby-Popper" methods "compare a district to a circle which is considered the most compact shape." Minorities/Majorities and Electoral Success, *Mun. Liabilty L. & Prac.* § 9.04. "Reock" computes "the ratio of the area of the district to the area of the minimum enclosing circle for the district" and "Polsby-Popper" computes "the ratio of the district area for the area of a circle with the same parameter." *Id.* They produce scores between 0 and 1, with 1 being the most compact. *Id.* (*See also* Clelland Rep. 12.)

The Governor's Assembly plan has a higher mean Reock score (0.397) than the existing Assembly plan from 2011 (0.390), meaning it is more compact on average. (Clelland Rep. 5, 12.) The Governor's Assembly plan has a slightly lower Polsby-Popper mean (0.251) than the existing plan (0.260), although the Governor's plan has a higher minimum (0.056 compared to 0.048), meaning the least compact districts in the Governor's plan are more compact than the least compact districts in the existing Assembly plan. (*Id.*)

Another measure is called "cut edges," which refers to the number of adjacent pairs of census blocks that lie in different districts. (*Id.*) This number functions as an analog to the total perimeter of all district boundaries. (*Id.*) On this measure, the Governor's Assembly plan has fewer cut edges, meaning it is more compact: it has 18,441 cut edges to 18,944 for the existing plan. (Clelland Rep. 5, 12.)

The Governor's Senate plan is slightly less compact on these three measures than the current plan, (Clelland Rep. 5, 13), but the compactness requirement does not apply to Senate districts. *Compare* Wis. Const. art. IV. § 4 (Assembly districts to "be in as compact form as practicable"), *with* Wis. Const. art. IV, § 5 (containing no such requirement for Senate districts). And while that requirement also does not apply to the congressional plans, the Governor's plan is slightly more compact than the current plan. (*Id.*)

Here, under multiple measures, the Governor's proposed Assembly map is appropriately compact and, thus, satisfies this constitutional requirement.

B. The proposed maps comply with the remaining state-law requirements.

The proposed maps also comply with other measures under Wisconsin law, including voting equality, minimizing county splits, and contiguity.

First, this Court's November 30th order states that Wisconsin has a one-person-one-vote requirement "consistent with its federal counterpart." Op. ¶¶ 29, 33. As discussed above, the maps here comply with the stricter federal test for court-drawn maps and, in turn, would satisfy Wisconsin's similar provision.

Second, as this Court's order recognized, the Wisconsin Constitution states that Assembly districts should be "bounded by county, precinct, town or ward lines." Wis. Const., art. IV, § 4. That is not always feasible, although it remains desirable. Op. ¶ 35. Consistent with that, prior maps have always contained a number of splits. For example, there are 58 county splits in the existing Assembly map, whereas the Governor's proposed plan contains only 53 splits. (Clelland Rep. 6, 13.) While this requirement does not apply to Senate or congressional districts, the Governor's plans do as well or better than those existing maps on county splits—45 county splits in Senate districts to the current 46, with the Governor's congressional plan equaling the current 12 county splits. (*Id.*)

Third, Assembly and Senate districts also should be "contiguous"—i.e., not detached from each other—but municipal islands are acceptable. Wis. Const., art. IV, § 4, § 5; Op. ¶36. Here, the proposed maps all contain contiguous districts. And each Senate district contains three undivided Assembly districts, as required. Wis. Const., art. IV, § 5; Wis. Stat. § 4.001.

Thus, the maps comply with Wisconsin law's other requirements.

C. The Governor's plans comply with other traditional criteria consistent with a "least changes" approach.

The Governor's plans also properly apply traditional redistricting criteria, in light of the restraints discussed above, and consistent with a "least changes" approach.

For example, the maps perform well as to temporary Senate "disenfranchisement" (i.e., a delayed Senate vote due to a voter's shift to a different district). *See* Op. ¶ 83 n.9. While it is desirable to avoid that delay, some degree of it is inevitable when redistricting. *See Baldus*, 849 F. Supp. 2d at 852. For example, in the 2011 redistricting, "nearly 300,000 voters" were affected. *Id.* However, under the plan proposed here, there are far less voters impacted. Only 139,677 voters are affected, less than half as in the last plan. (Clelland Rep. 3, 9.)

Further, the Governor's proposals do unusually well when it comes to the pairing of incumbents. *See Karcher v. Daggett*, 462 U.S. 725, 740 (1983) (noting the consideration of avoiding pairing of incumbents). Around 22 to 24 incumbents were paired in the existing plan. *Whitford v. Gill*, 218 F. Supp. 3d 837, 926 & n.404 (W.D. Wis. 2016), *vacated and remanded*, 138 S. Ct. 1916 (2018). And, in *Prosser*, "the court plan pair[ed] only 16 incumbents in both houses of the legislature." *Prosser*, 793 F. Supp. at 871.

The present proposals are far better on this measure than the existing plan, and even significantly improve on *Prosser*. Based on the available information concerning incumbent addresses, the proposed maps contain only three incumbent pairings: two pairs of representatives in the

Assembly, and one pair of senators in the Senate, affecting a total of six incumbents.[4] That is dramatically lower than other recent plans and is another reason why the plans proposed here best satisfy this Court's mandate.

Notably, a low number of temporarily disenfranchised voters and incumbent pairings also is consistent with a "least changes" approach. Low disenfranchisement is a result of reducing the number of voters who are moved into new Senate districts, and low incumbent pairings shows that districts were drawn to minimize the movement of existing legislators into the same district.

* * * *

Under the requirements stated in this Court's November 30 order, the proposals here meet or exceed what is required, while reasonably applying traditional redistricting criteria. As directed by the Court, these maps excel at its primary concern: any changes are minimal, or nonexistent, and they exceed the performance on this measure of the Legislature's recently passed maps. The maps also comply with federal law, are appropriately compact, and perform unusually well as to the pairing of incumbents and Senate disenfranchisement. This Court therefore should adopt the proposed maps under its criteria.

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[4] Paired into the Governor's 83rd Assembly District are Chuck Wichgers, who currently represents the 83rd Assembly District, and Cody Horlacher, who currently represents the 33rd Assembly District. Paired into the Governor's 24th Assembly District are Daniel Knodl, who currently represents the 38th Assembly District, and Barbara Dittrich, who currently represents the 24th Assembly District. And paired into the Governor's 8th Senate District are Alberta Darling, who currently represents the 8th Senate District, and Dale Kooyenga, who currently represents the 5th Senate District.

CONCLUSION

The Court should adopt the attached proposed maps under the criteria stated in the November 30th order.

Dated this 15th day of December 2021.

Respectfully submitted,

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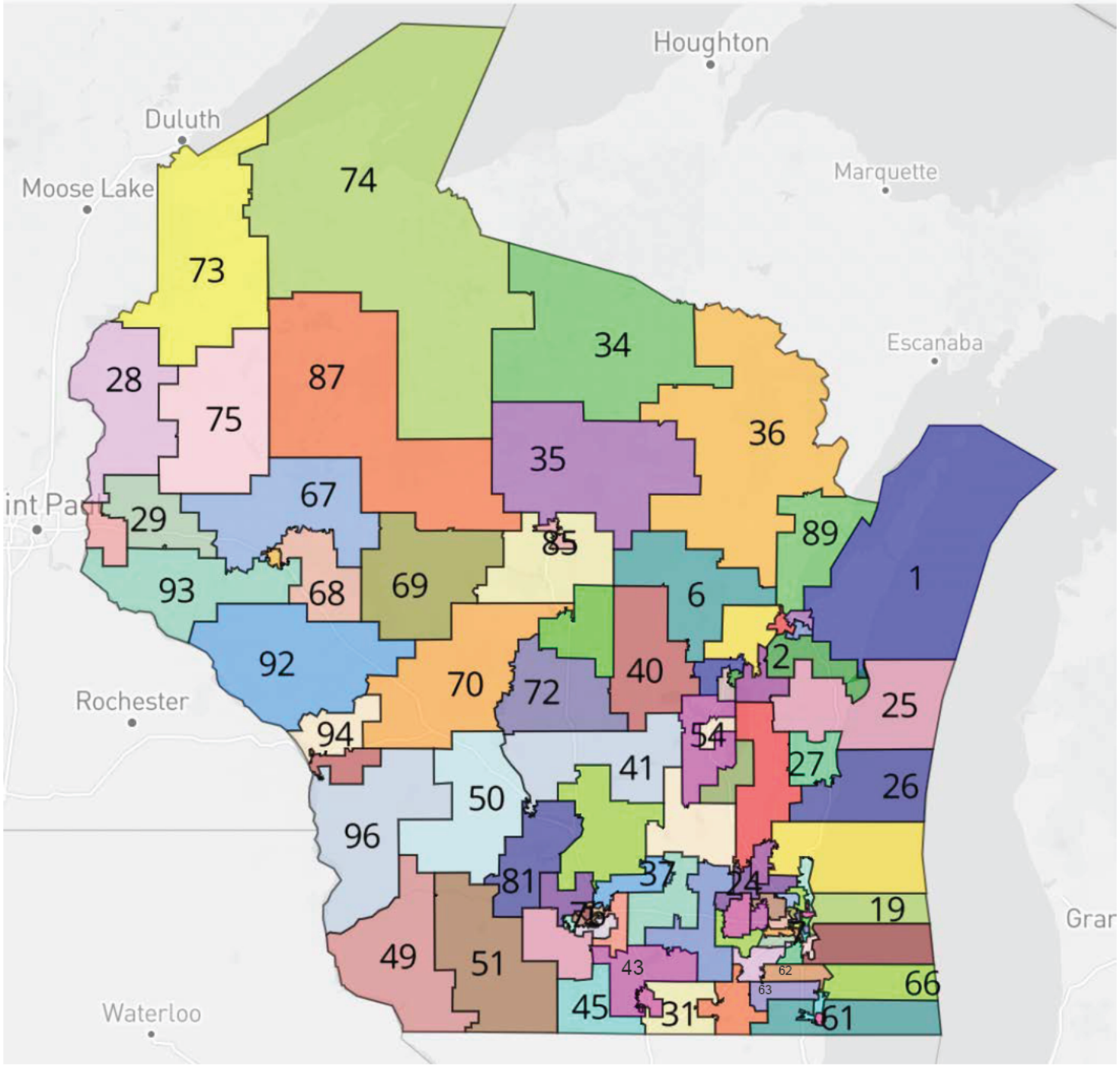
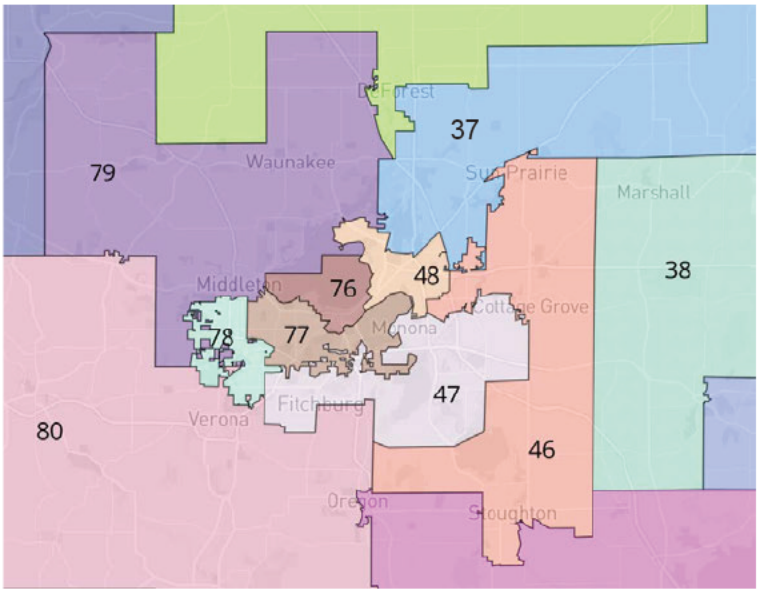
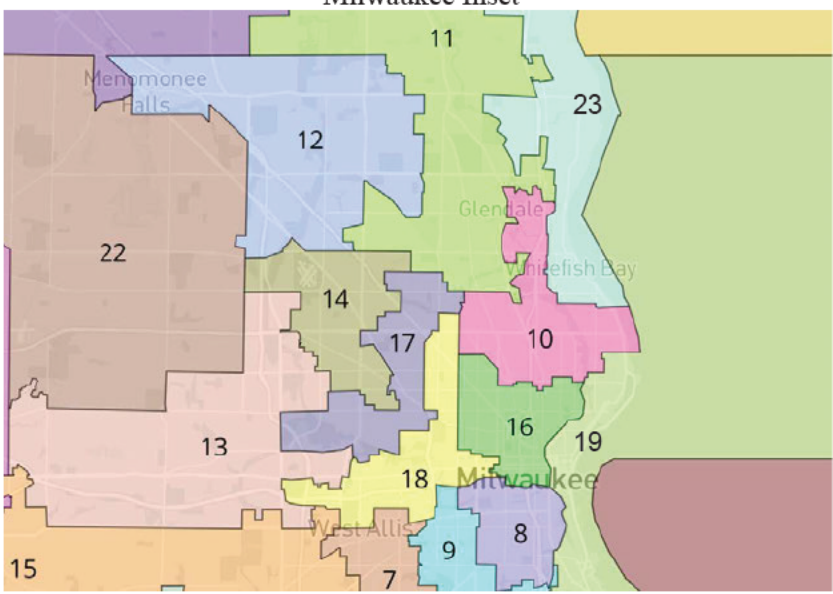
Governor's Least Changes Assembly



Madison Inset

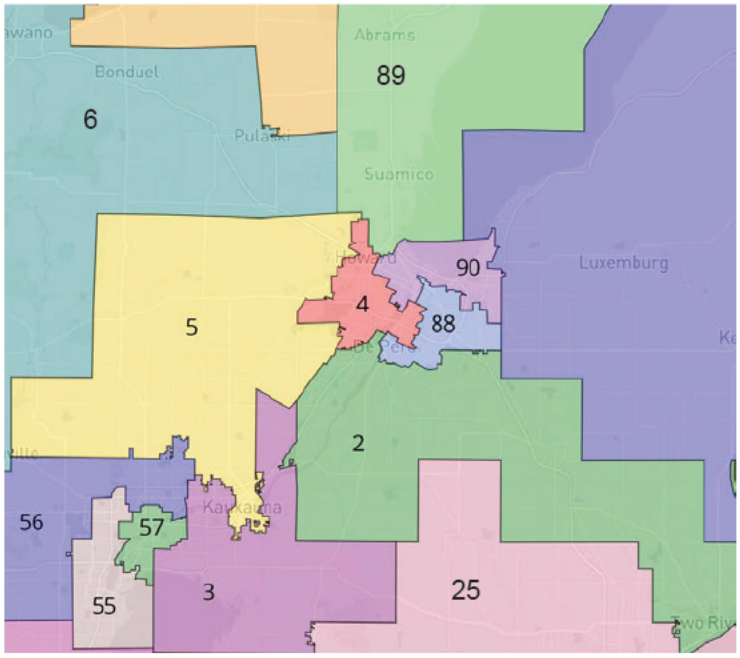


Milwaukee Inset

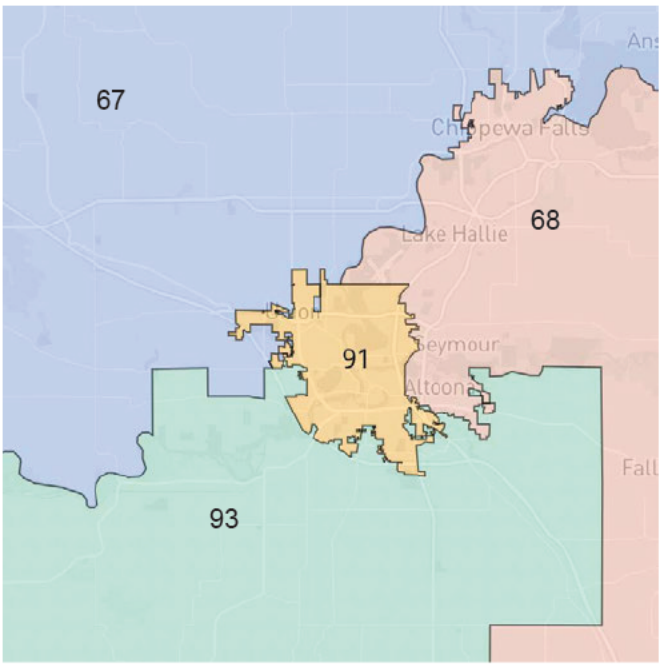


Governor's Least Changes Assembly

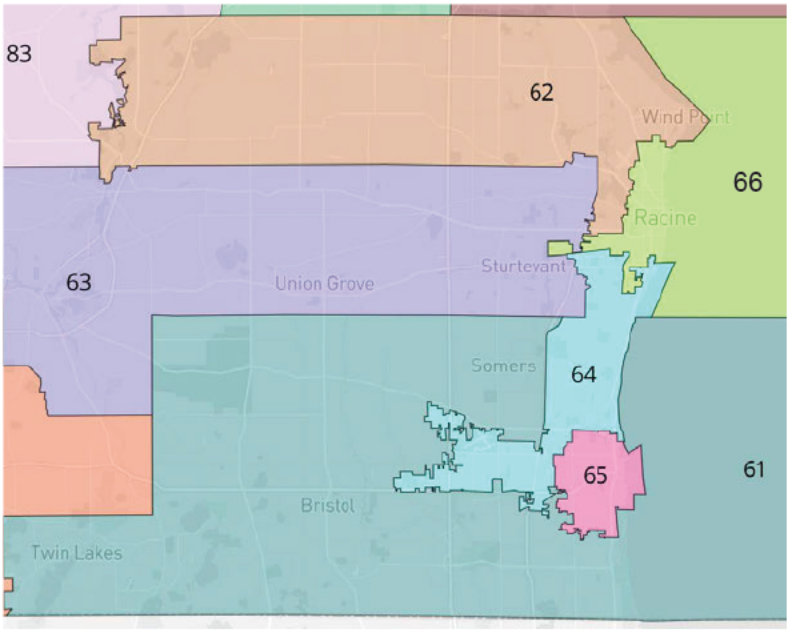
Green Bay Area Inset



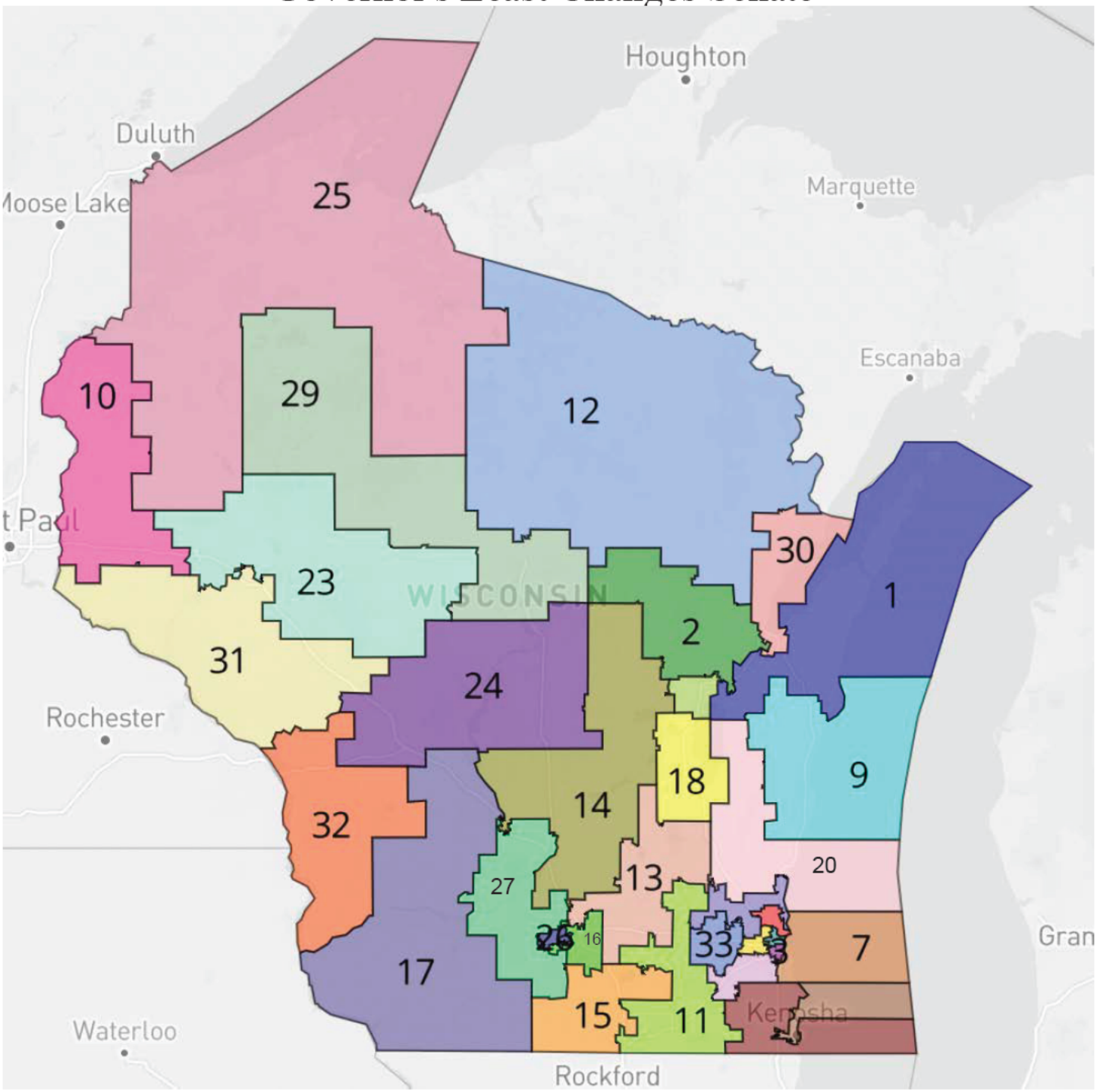
Eau Claire/Chippewa Falls Inset



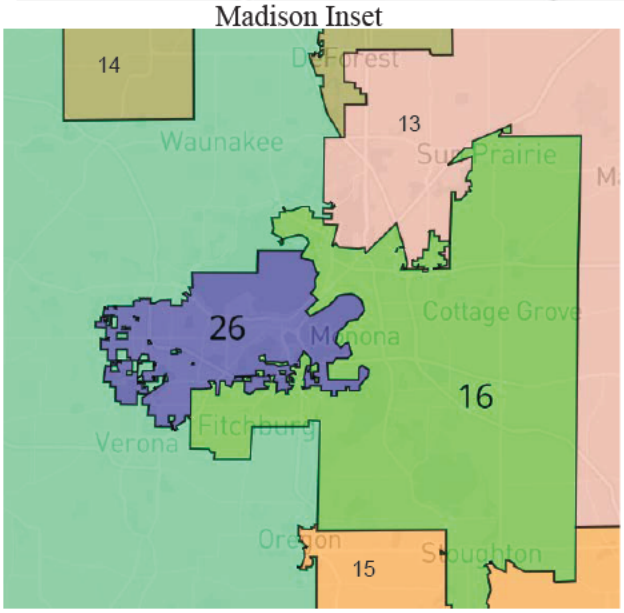
Southeast WI Inset



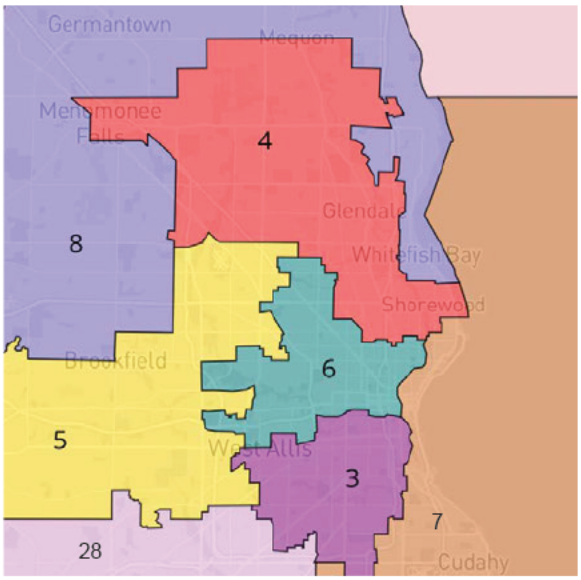
Governor's Least Changes Senate



Madison Inset

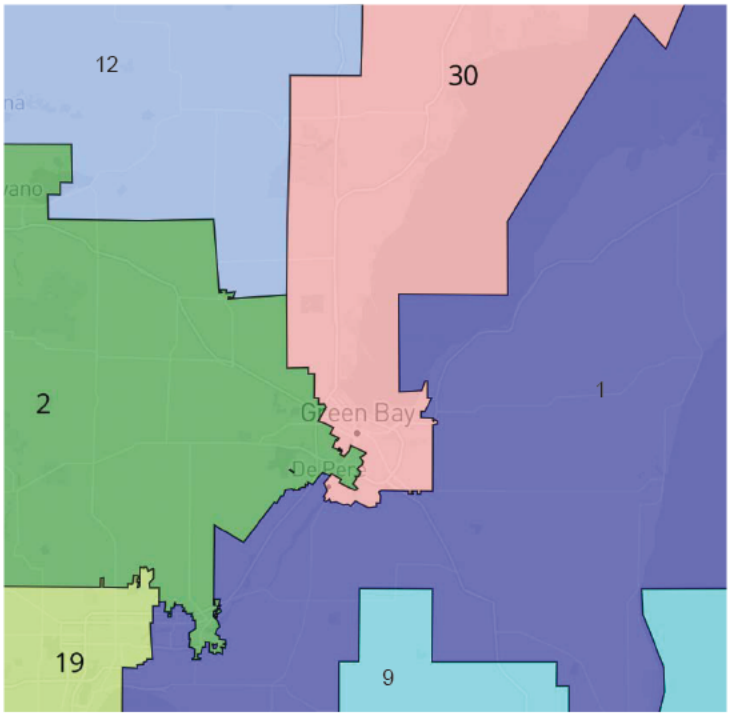


Milwaukee Inset

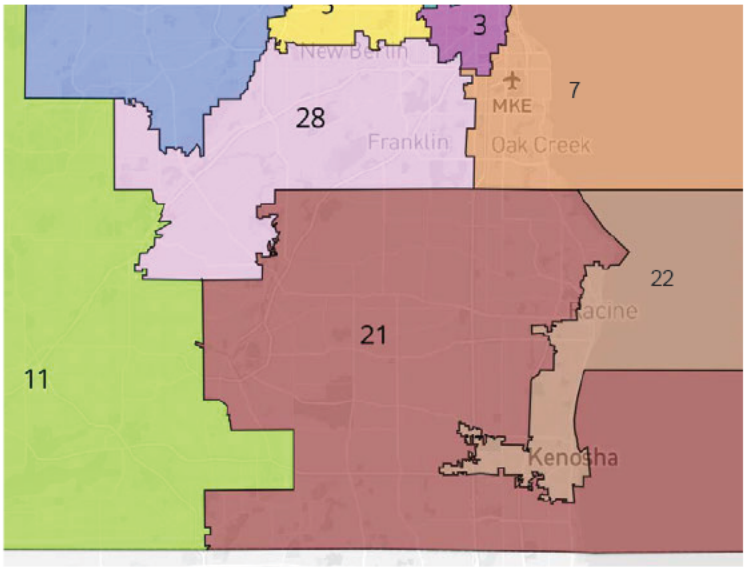


Governor's Least Changes Senate

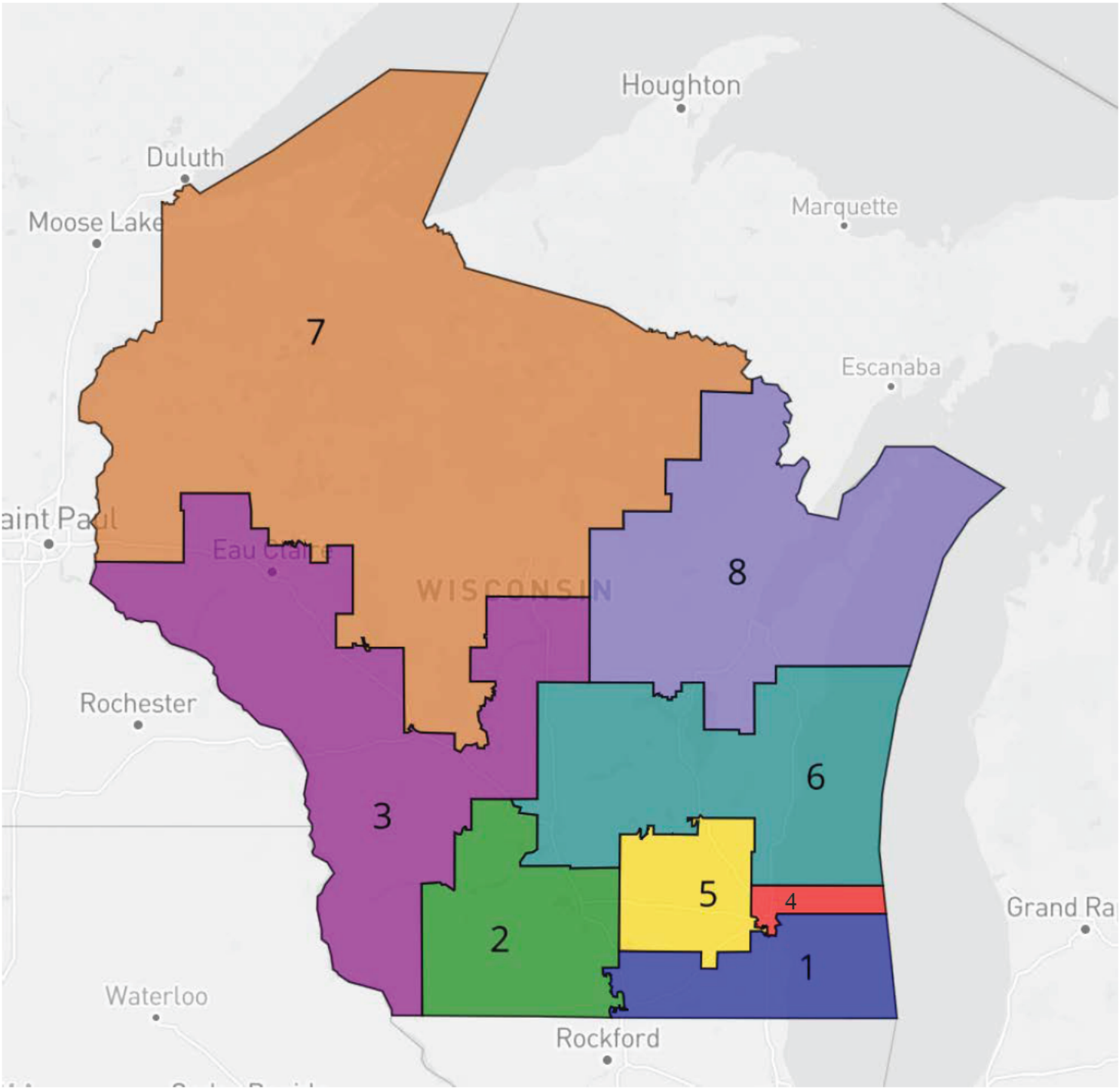
Green Bay Area Inset



Southeast WI Inset

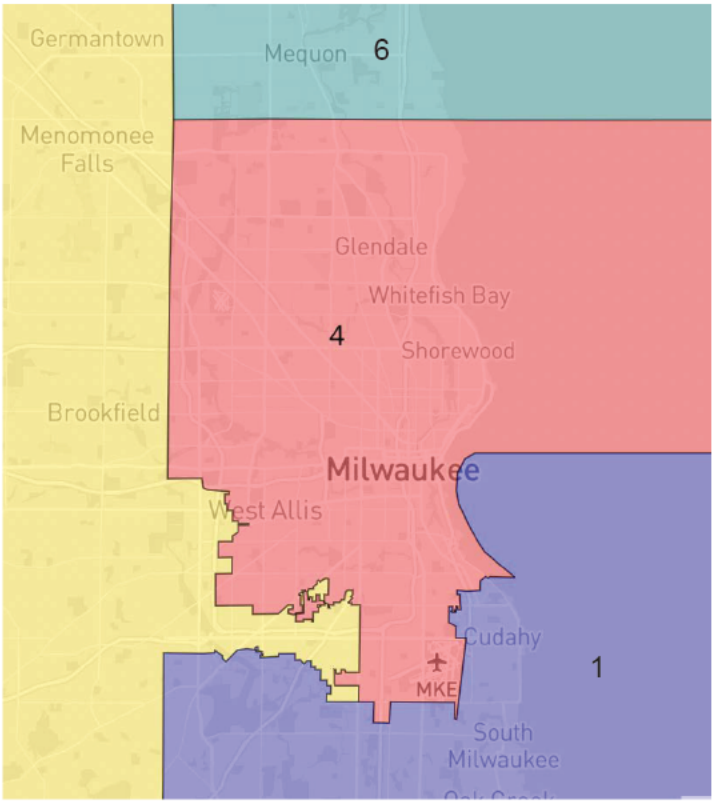


Governor's Least Changes Congressional

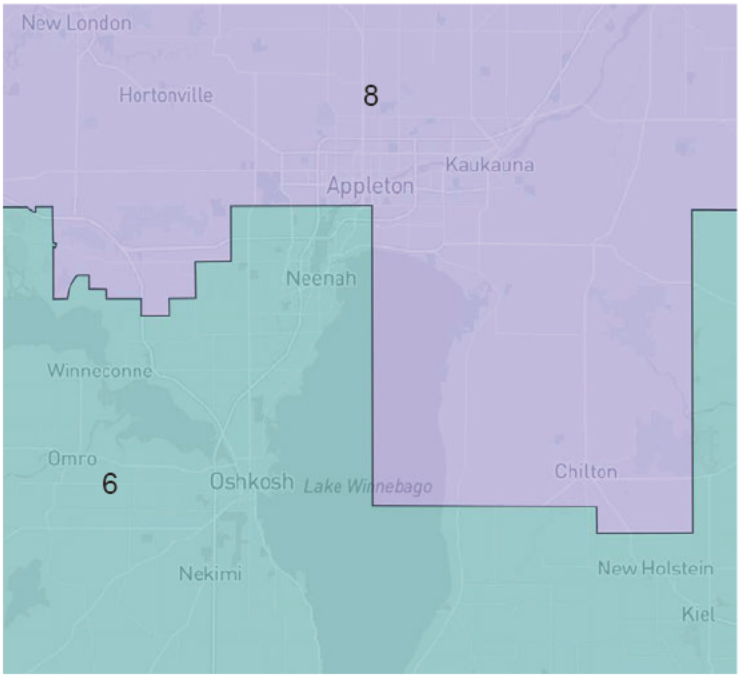


Governor's Least Changes Congressional

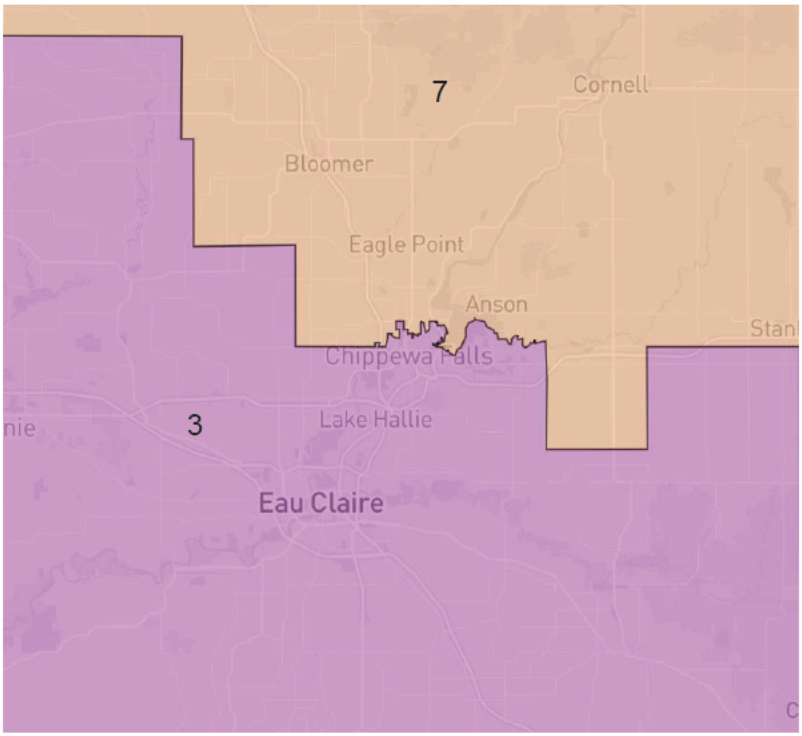
Milwaukee Inset



Fox Valley Inset



Eau Claire/Chippewa Falls Inset



FORM AND LENGTH CERTIFICATION

I hereby certify that this brief conforms to the rules contained in Wis. Stat. § (Rule) 809.19(8)(b), (bm) and (c) for a brief produced with a proportional serif font. The length of this brief is 3656 words.

Dated this 15th day of December 2021.

ANTHONY D. RUSSOMANNO
Assistant Attorney General

CERTIFICATE FILING OF SERVICE

I hereby certify that *Governor Tony Evers's Brief in Support of Proposed Maps* was email filed in pdf form to clerk@wicourts.gov, on or before 12:00 p.m. on December 15, 2021.

I further certify the original and 10 copies of this brief, with the notation that "This document was previously filed via email," were hand-delivered for filing to the Wisconsin Supreme Court Clerk's Office, 110 East Main Street, Madison, WI 53701, no later than 12:00 p.m. on December 16, 2021.

I further certify that on this day, I caused service of a copy of this brief to be sent via electronic mail to counsel for all parties who have consented to service by email. I caused service of copies to be sent by U.S. mail and electronic mail to all counsel of record who have not consented to service by email.

Dated this 15th day of December 2021.

ANTHONY D. RUSSOMANNO
Assistant Attorney General