
No. 2021AP1450-OA

In the Supreme Court of Wisconsin

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 MIKE GALLAGHER, 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.

AFFIDAVIT OF KEVIN M. LEROY

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

Kevin M. LeRoy, being duly sworn on oath, deposes and
says:

1. I am counsel for Intervenors-Petitioners
Congressmen Glenn Grothman, Mike Gallagher, Bryan Steil,
Tom Tiffany, and Scott Fitzgerald in the above-captioned
case, currently pending before this Court.

2. Attached as **Exhibit A** to this affidavit is a true
and correct copy of a memorandum from the Legislative
Reference Bureau to Speaker Robin Vos, entitled “Geographic
Retention In Congressmen’s Revised Proposal In *Johnson v.*
Wisconsin Elections Commission,” and dated January 3, 2022.

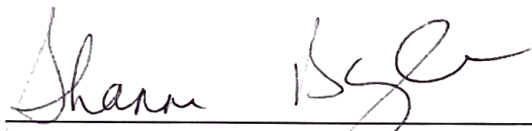
FURTHER AFFIANT SAYETH NOT



KEVIN M. LEROY

SWORN AND SUBSCRIBED BEFORE ME

This 4 day of January, 2022



Notary Public, State of Wisconsin



State of Wisconsin
County of Dane

My Commission expires: 9-10-22

EXHIBIT A

Richard A. Champagne, Chief
Legal 608.504.5801 • Research 608.504.5802



One East Main Street, Suite 200
Madison, WI 53703 • <http://legis.wisconsin.gov/lrb>

MEMORANDUM

TO: Speaker Robin Vos

FROM: Legislative Reference Bureau

DATE: January 3, 2022

SUBJECT: Geographic retention in congressmen's revised proposal in *Johnson v. Wisconsin Elections Commission*

You requested information related to the revised congressional redistricting proposal that you provided from the congressmen intervener-petitioners in *Johnson v. Wisconsin Elections Commission*. Specifically, you asked for data on the proposal's geographic retention. Geographic retention is a measure of the area in each congressional district under current law that remains in the same congressional district under a redistricting proposal.

In the congressmen's revised proposal, 96.7 percent of Wisconsin's geographic area stays in its current congressional district.¹

Current District	Land Retained (Square Miles)	Land Moved (Square Miles)	Percent Land Retained
1	1,772.2	2.4	99.9%
2	4,029.5	576.8	87.5%
3	10,721.9	703.7	93.8%
4	129.2	0.0	100.0%
5	1,942.3	11.7	99.4%

¹ Measured in ARCMAP 10.7.1 with a North American Datum of 1983/2011 Wisconsin Transverse Mercator (US Feet) projection. This measure only compares those 2020 census blocks which have congressional district assignments. This measure does not include unassigned water areas, such as the Great Lakes and Lake Winnebago.

6	4,879.9	199.6	96.1%
7	23,972.3	0.1	100.0%
8	6,574.8	360.1	94.8%
Statewide	54,022.2	1,854.4	96.7%

We hope you find this information useful. Please let us know if you have any questions or if we can provide any additional assistance.