

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  
MOTION TO FILE CORRECTED PROPOSED STATE  
MAPS**

---

JOSHUA L. KAUL  
Attorney General of Wisconsin

ANTHONY D. RUSSOMANNO  
Assistant Attorney General  
State Bar #1076050

BRIAN P. KEENAN  
Assistant Attorney General  
State Bar #1056525

Attorneys for Governor Tony Evers

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 267-2238 (ADR)  
(608) 266-0020 (BPK)  
(608) 294-2907 (Fax)  
russomannoad@doj.state.wi.us  
keenanbp@doj.state.wi.us

Intervenor-Respondent Governor Tony Evers moves to file a corrected Assembly map and corresponding Senate map pursuant to this Court's November 17, 2021, order. The corrections are technical, affect only a very small amount of population, and would be helpful for the local administration of the maps if they are selected.

1. This Court's November 17, 2021, order provides that parties may move to submit amended maps if it determines that the map "merits a correction." If so, the party shall submit a description of the corrections, reasons for them, a proposed amended map, and state whether the motion is opposed.

2. The Governor proposed Assembly, Senate, and congressional maps on December 15, 2021.

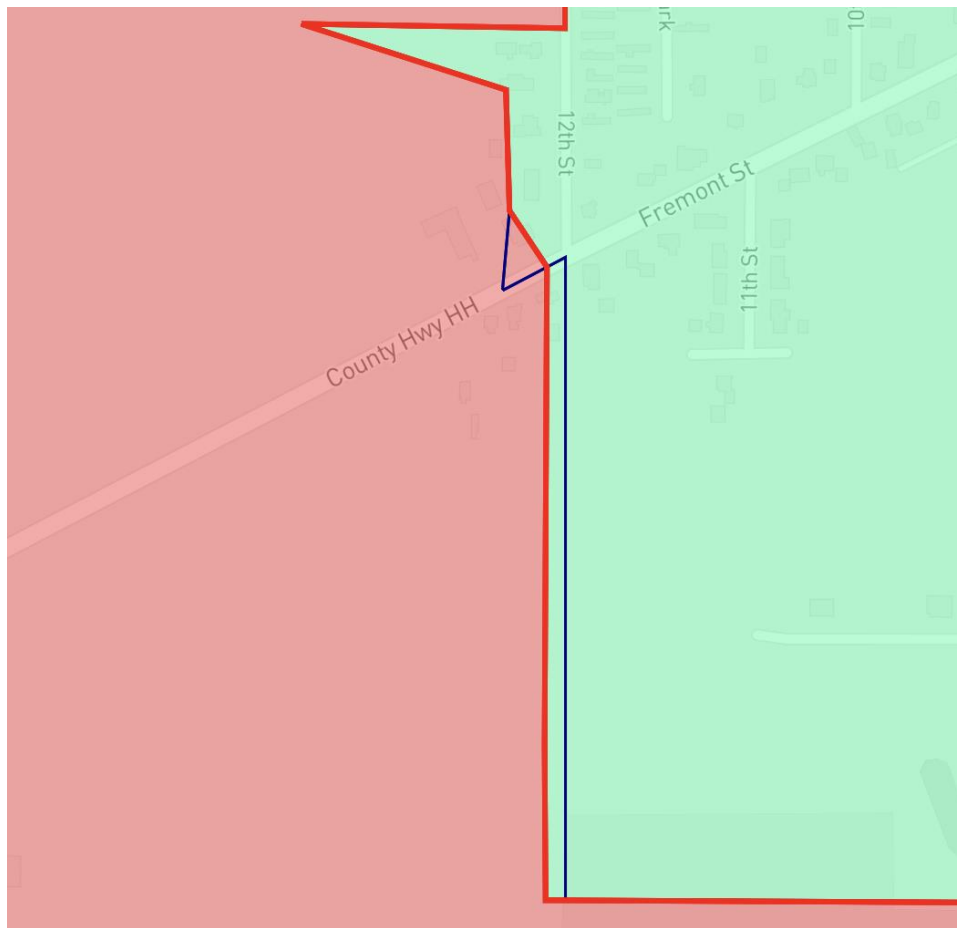
3. Subsequently, it was determined that technical corrections to the Assembly and Senate maps are warranted to aid with their administration. These corrections remove splits that inadvertently severed very small segments of some municipalities, leaving zero-population or very small population remnants.

4. These corrections ensure that small amounts of a municipality are not excluded from districts that otherwise encompass a municipality. Failing to make these corrections would make legal descriptions of the districts more cumbersome, such as those in chapter 4 of the Wisconsin Statutes. Further, the corrections would simplify future local election administration.

5. The first set of proposed technical corrections are listed in Attachment A, Part I, and fix map projection errors. In drafting the submitted maps, 2011 maps were used as a guide. Because the 2011 maps do not project perfectly onto 2020 US Census blocks, mapping software incorrectly assigned some districts on the margins of the 2011 districts. The 2011 map lines used as a drafting guide were sometimes

incorrect by very small margins, resulting in some placement of lines at the edges of municipalities that inadvertently separated small segments with little or no population.

6. For example, the Governor's originally proposed Assembly map splits the town of New Holstein in Calumet County between Districts 59 and 27; however, the portion of the town in District 27 contains *no* population. (Clelland Resp. Rep. 26.) An image illustrating this problem is below.

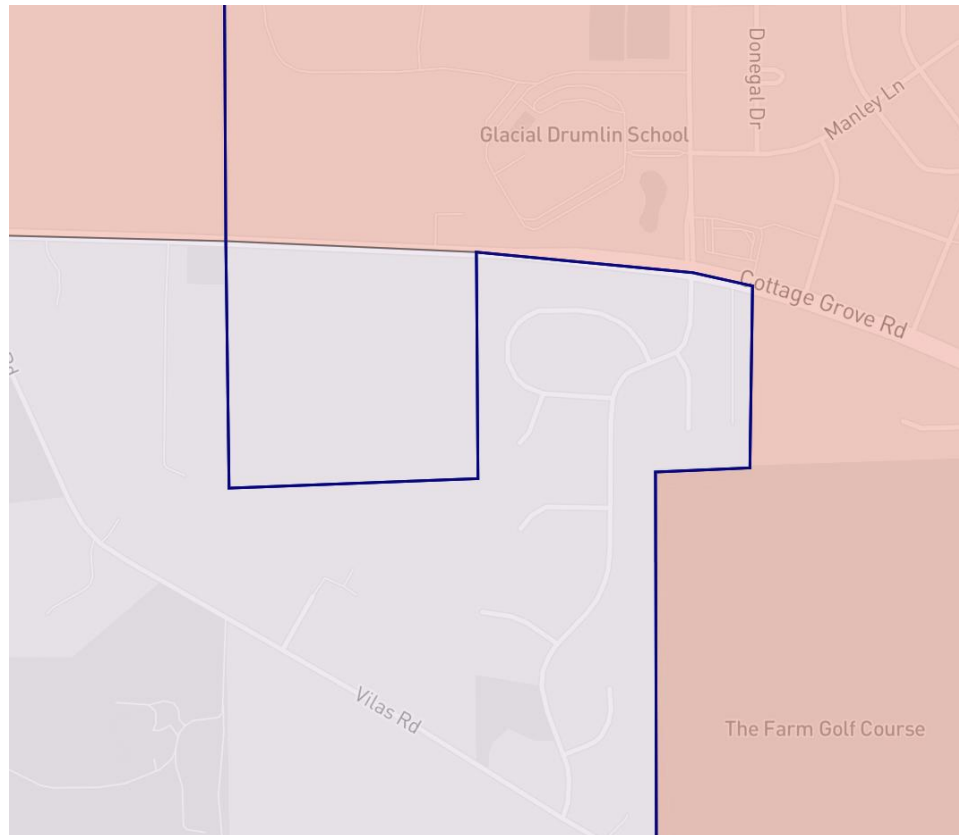


The red line is the incorrect projection of the 2011 plan, and the current New Holstein boundary is the blue line adjacent to it. The proposed correction moves the district line to follow the actual New Holstein boundary, and also does so for other municipalities listed in Attachment A, Part I.

7. In Attachment A, Part I, most of the Governor's proposed corrections (32) affect zero population, while some (17) affect a very small amount of population, totaling 216 people. While some corrections unify municipalities, they do not meaningfully affect core retention, population equality, or disenfranchisement numbers discussed by the parties. Similarly, because the changes are very small geographically, there is no meaningful impact on other measures, like compactness. Those figures are either identical, or nearly identical, to the figures reported in the Governor's existing expert reports, as confirmed in the Supplemental Clelland Report in Attachment D to this motion.

8. The second set of proposed technical corrections are found in Attachment A, Part II, and correct a small number of other inadvertent municipality splits that have no or very little population. These 12 instances were unintended during the map-drafting process and were largely based on inadvertently splitting recent annexations. That resulted in the accidental splitting of a few municipal areas with no or little population separate from the rest of the municipality.

9. For example, the Governor's originally proposed Assembly map splits the Village of Cottage Grove between Districts 46 and 47; however, the portion of the Village in District 47 currently contains no population. An image illustrating this situation is below.



In this example, the blue line is the Village of Cottage Grove boundary, and the two shaded color areas represent Districts 46 (red) and 47 (grey). The village is largely within District 46, but a small portion is in District 47. This was inadvertent.

10. Seven of the corrections in Attachment A, Part II, affect no population. The remaining 5 corrections affect a total of 123 people. Like the corrections listed in Attachment A, Part I, the corrections in Part II do not meaningfully affect the core retention, population equality, or disenfranchisement numbers discussed by the parties. Similarly, because the changes are very small geographically, there is no meaningful impact on other measures, like compactness, as confirmed in the Supplemental Clelland Report in Attachment D to this motion.

11. In sum, all of the technical corrections described in this motion and its appendices move a total of 339 people

and the corresponding line movement is very small. There is no meaningful impact on the measures discussed in the previous reports (other than a somewhat lower number of municipal splits). For example, for the Assembly map, the maximum population deviation, the deviation range, and the mean deviation are all the same percentages. (Clelland Suppl. Rep. 2, App. D; Clelland Initial Rep. 7.) For the Senate map, those figures also are all the same, with the exception of the range below the ideal, which changes one-hundredth of one percent from 0.57% below to 0.58% below. (*Id.*) Using the LTSB data, the core population movement percentage remains the same for the Assembly map and is within one-hundredth of one percent for the Senate map, which changes from 7.83% to 7.82% movement. (Clelland Suppl. Rep. 2, App. D.) The percentage of temporarily disenfranchised voters is unchanged in the Senate map (and is slightly lower in raw numbers). (Clelland Suppl. Rep. 4, App. D.) Further, the Reock compactness scores are identical, and the Polsby-Popper compactness scores are less than one-hundredth of one percent different. (Clelland Suppl. Rep. 4, App. D.) These and other updated figures are provided in the supplemental report in Attachment D.

12. A list of the resulting Census Block changes is provided in Attachment B.

13. The maps in Attachment C reflect the corrected Assembly districts. In addition, because the Senate districts are made up of those corrected Assembly districts, a corresponding updated Senate map also is submitted in Attachment C.

14. Data files of the CSV and Shapefiles for the corrected Assembly map and corresponding Senate map are available at the following link: [https://www.dropbox.com/sh/a94yyx9a30z6or4/AABck9PHlSu2fxF\\_PyRWcE-Ra?dl=0](https://www.dropbox.com/sh/a94yyx9a30z6or4/AABck9PHlSu2fxF_PyRWcE-Ra?dl=0).

15. The Johnson Petitioners, BLOC, and Senator Bewley do not oppose the motion. The Legislature does not oppose the motion because the Governor has provided a supplemental expert report. The Hunter Intervenors do not oppose the motion based on their conclusion that the Governor is seeking to make corrections and not introduce a new map, which was the basis for their opposition to the Congressmen's motion. The Citizen Mathematicians oppose this motion. The Congressmen take no position on this motion because it does not impact any proposed congressional map, but do note that the Governor's motion and the Hunter Petitioners' position on that motion are both inconsistent with the position that these parties took on the Congressmen's pending motion. The Wisconsin Elections Commission take no position on the motion.

16. For the reasons stated, the Governor respectfully requests that the Court grant this motion to accept the corrected Assembly map and corresponding Senate map as amendments to the Governor's state proposals.

Dated this 6th day of January 2022.

Respectfully submitted,

JOSHUA L. KAUL  
Attorney General of Wisconsin



ANTHONY D. RUSSOMANNO  
Assistant Attorney General  
State Bar #1076050

BRIAN P. KEENAN  
Assistant Attorney General  
State Bar #1056525

Attorneys for Governor Tony Evers



Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 267-2238 (ADR)  
(608) 266-0020 (BPK)  
(608) 294-2907 (Fax)  
russomannoad@doj.state.wi.us  
keenanbp@doj.state.wi.us


### CERTIFICATE OF FILING/SERVICE

I hereby certify that *Governor Tony Evers's Motion to File Corrected Proposed State Maps* was email filed in pdf form to [clerk@wicourts.gov](mailto:clerk@wicourts.gov), on January 6, 2022.

I further certify eleven copies of this motion, 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, on January 6, 2022.

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 6th day of January 2022.

  
\_\_\_\_\_  
ANTHONY D. RUSSOMANNO  
Assistant Attorney General

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

---

**ATTACHMENT A TO MOTION TO FILE CORRECTED  
PROPOSED STATE MAPS**

---

JOSHUA L. KAUL  
Attorney General of Wisconsin

ANTHONY D. RUSSOMANNO  
Assistant Attorney General  
State Bar #1076050

BRIAN P. KEENAN  
Assistant Attorney General  
State Bar #1056525

Attorneys for Governor Tony Evers

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 267-2238 (ADR)  
(608) 266-0020 (BPK)  
(608) 294-2907 (Fax)  
russomannoad@doj.state.wi.us  
keenanbp@doj.state.wi.us

This attachment describes the changes made in Intervenor-Respondent Governor Tony Evers's Motion to File Corrected Proposed State Maps pursuant to this Court's November 17, 2021, order. As stated in the motion, these corrections are warranted for two reasons.

**I. Corrections due to projection errors in mapping software.**

**A. Changes that affect no population.**

- Village of Allouez, Brown County (made whole in the 4th taking parts from the 90th)
- Town of Berry, Dane County (made whole in the 79th taking parts from the 80th)
- Town of Buchanan, Outagamie County (made whole in the 3rd taking parts from the 57th)
- Village of Cambridge (made whole in the 38th taking parts from the 33rd)
- Town of Cameron, Wood County (made whole in the 69th taking parts from the 86th)
- City of Delavan, Walworth County (made whole in the 32nd taking parts from the 31st)
- Town of Germantown, Washington County (made whole in the 24th taking parts from the 58th)
- Town of Grafton, Ozaukee County (made whole in the 23rd taking parts from the 60th)
- Village of Hartland, Waukesha County (made whole in the 99th taking parts from the 22nd)
- Town of Irving, Jackson County (made whole in the 92nd taking parts from the 70th)
- Town of Manitowish Waters, Vilas County (made whole in the 34th taking parts from the 74th)

- Village of McFarland, Dane County (made whole in the 47th taking parts from the 46th)
- Village of Mukwonago (made whole in the 83<sup>rd</sup> taking parts from the 97<sup>th</sup>)
- Town of New Holstein, Calumet County (made whole in the 59th taking parts from the 27th)
- Town of Newport, Columbia County (made whole in the 81st taking parts from the 41st)
- Village of North Fond du Lac, Fond du Lac County (made whole in the 53<sup>rd</sup> taking parts from the 97th)
- City of Onalaska, La Crosse County (made whole in the 94th taking parts from the 95th)
- Town of Oregon, Dane County (made whole in the 80th taking parts from the 43<sup>rd</sup>)
- City of Portage, Columbia County (made whole in the 81st taking parts from the 42<sup>nd</sup>)
- Town of Plymouth, Rock County (made whole in the 43<sup>rd</sup> taking parts from the 45th)
- Village of Pulaski (made whole in the 6th taking parts from the 36th)
- Town of Randall, Kenosha County (made whole in the 61st taking parts from the 32<sup>nd</sup>)
- Town of Rib Mountain, Marathon County (made whole in the 86th taking parts from the 85th)
- Town of Seymour, Eau Claire County (made whole in the 68th taking parts from the 91st)
- Town of Sheboygan, Sheboygan County (made whole in the 27th taking parts from the 26th)
- Village of Slinger, Washington County (made whole in the 58th taking parts of the 24th)
- City of Stevens Point, Portage County (made whole in the 71st taking parts of the 70th)
- Town of Sylvester, Green County (made whole in the 45th taking parts from the 51st)

- Village of Turtle Lake (made whole in the 75th taking parts of the 28th)
- Town of Vienna, Dane County (made whole in the 79th taking parts from the 42nd)
- Town of Wheaton, Chippewa County (made whole in the 67th taking parts from the 91st)
- Town of Whitewater, Walworth County (made whole in the 43rd taking parts from the 31st)

**B. Changes that affect small amounts of population.**

- Town of Burke, Dane County (12 people moved into the 37th from the 48th, making Burke whole)
- Town of Brockway, Jackson County (2 people moved into the 92nd from the 70th, making Brockway whole)
- Town of Columbus, Columbia County (9 people moved into the 42nd from the 37th, making Columbus whole)
- Town of Delton, Sauk County (25 people moved into the 81st from the 41st, making Delton whole)
- Town of Fond du Lac, Fond du Lac County (6 people moved into the 52nd from the 53rd, making Fond du Lac whole)
- Town of Fort Winnebago, Columbia County (4 people moved into the 42nd from the 81st, making Fort Winnebago whole)
- Village of Grafton, Ozaukee County (15 people moved into the 23rd from the 60th, making Grafton whole)
- Town of Janesville, Rock County (26 people moved into the 43rd from the 44th, making Janesville whole)
- City of Kaukauna (8 people moved into the 5th from the 3rd, making Kaukauna whole)
- City of Kiel (1 person moved into the 27th from the 59th, making Kiel whole)

- Town of Koshkonong, Jefferson County (2 people in a non-contiguous portion of Koshkonong moved into the 43rd from the 33rd)
- Town of Middleton, Dane County (4 people moved into the 79th from the 78th, making Middleton whole)
- Town of Lisbon, Waukesha County (66 people on Lisbon's western boundary moved into the 22nd from the 99th)
- City of Pewaukee, Waukesha County (16 people moved into the 98th from the 99th, making Pewaukee whole)
- Town of Rock, Rock County (11 people moved into the 43rd from the 44th, making Rock whole)
- Town of Rutland, Dane County (3 people moved into the 43rd from the 80th, making Rutland whole)
- Town of Washington, Eau Claire County (4 people moved into the 93rd from the 68th and, 2 people moved into the 93rd from the 91st, making Washington whole)

## **II. Corrections due to other inadvertent splits.**

### **A. Changes that affect no population.**

- City of Altoona, Eau Claire County (made whole in the 68th taking parts from the 93rd)
- Village of Brooklyn (made whole in the 80th taking parts from the 43rd)\*
- City of Columbus, Columbia County (made whole in the 37th taking parts from the 42nd)
- Village of Cottage Grove, Dane County (made whole in the 46th taking parts of the 47th)
- Village of Marathon City, Marathon County (made whole in the 86th taking parts from the 87th)

- Village of Montfort (made whole in the 49th taking parts from the 51st)
- Village of Rockland, La Crosse County (made whole in the 94th taking parts from the 70th)

**B. Changes that affect small amounts of population.**

- Village of Dousman, Waukesha County (3 people moved into the 99th from the 97th)
- Village of Lake Delton, Sauk County (35 people moved into the 41st from the 81st, making Lake Delton whole)
- City of Fort Atkinson, Jefferson County (26 people moved into the 33rd from the 43rd)
- Village of Merton, Waukesha County (44 people moved into the 99th from the 22nd)\*
- City of Neenah, Winnebago County (15 people moved into the 55th from the 53rd)

\*The Villages of Brooklyn and Merton also required corrections due to projection errors, but they also have been listed here due to an additional inadvertent split.



## Governor's Corrected Least Changes Assembly Map

Census Block Comparison List			
Census Block ID	Assigned District in Submitted Governor's Least Changes Assembly Map	Assigned District in Corrected Governor's Least Changes Assembly Map	Population in Census Block
550090208002005	90	4	0
550090208002006	90	4	0
550150203064005	3	5	0
550150206004030	59	27	1
550150206004033	27	59	0
550150206004055	59	27	0
550170104003065	91	67	0
550219703003028	41	81	0
550219704011036	42	81	0
550219705001052	42	81	0
550219705001053	42	81	0
550219705002003	42	81	0
550219705002004	81	42	0
550219705002008	81	42	4
550219705002018	42	81	0
550219705002019	42	81	0
550219706003059	42	81	0
550219706003088	42	81	0
550219706003089	42	81	0
550219711001100	37	42	0
550219711001106	42	37	0
550219712002005	42	37	0
550219712002006	42	37	0
550219712002008	37	42	0
550219712002011	37	42	0
550219712002041	37	42	0
550219712002043	37	42	9
550219712002044	42	37	0
550219712003013	42	37	0
550219712003022	42	37	0
550219712003023	42	37	0
550219712004040	42	37	0
550219712004041	42	37	0
550250004062002	78	79	0
550250026033009	48	37	0
550250026033022	48	37	6
550250026033031	48	37	6
550250026033034	48	37	0
550250109032002	78	79	4
550250109054020	78	79	0
550250109054023	78	79	0
550250109054025	78	79	0

## Governor's Corrected Least Changes Assembly Map

Census Block Comparison List			
Census Block ID	Assigned District in Submitted Governor's Least Changes Assembly Map	Assigned District in Corrected Governor's Least Changes Assembly Map	Population in Census Block
550250109054027	78	79	0
550250120024122	46	47	0
550250120032011	47	46	0
550250124002073	43	80	0
550250124002080	43	80	0
550250124002082	80	43	3
550250124002099	43	80	0
550250125011028	43	80	0
550250125011033	43	80	0
550250125013011	43	80	0
550250130001055	80	79	0
550250132012095	42	79	0
550350003025002	93	68	0
550350003026020	68	93	0
550350003026034	93	68	0
550350003026038	91	93	0
550350003026043	91	93	2
550350004021055	68	93	4
550350005023041	91	68	0
550350008031033	91	93	0
550350008034003	91	93	0
550350009003033	91	93	0
550350009003050	91	93	0
550390413001070	53	52	0
550390413002010	52	53	0
550390413002026	53	52	6
550459604002028	51	45	0
550499503001054	51	49	0
550539601001062	70	92	0
550539601001063	70	92	0
550539601001147	70	92	0
550539601003214	70	92	0
550539601003217	70	92	2
550539601003219	70	92	0
550551006021045	33	38	0
550551013003024	33	43	0
550551013003028	33	43	2
550551013003031	43	33	14
550551013003032	43	33	1
550551013003036	43	33	0
550551013003067	43	33	11
550590030013028	32	61	0

## Governor's Corrected Least Changes Assembly Map

Census Block Comparison List			
Census Block ID	Assigned District in Submitted Governor's Least Changes Assembly Map	Assigned District in Corrected Governor's Least Changes Assembly Map	Population in Census Block
550590030014003	32	61	0
550590030014034	32	61	0
550630105004020	95	94	0
550730008002017	85	86	0
550730023023054	87	86	0
550819509003050	70	94	0
550831013012031	36	6	0
550870106012011	57	3	0
550870121011004	3	5	0
550870121011008	3	5	0
550870121011030	3	5	8
550870121011035	3	5	0
550896401023024	60	23	0
550896402011005	60	23	0
550896501031005	60	23	15
550896501041015	60	23	0
550896501042004	60	23	0
550959605002015	28	75	0
550959605002023	28	75	0
550959605002024	28	75	0
550959605002025	28	75	0
550959605002026	28	75	0
550979605003126	70	71	0
551050005001018	44	43	2
551050012012001	44	43	2
551050012012003	44	43	0
551050012012004	44	43	0
551050012012026	44	43	13
551050012012054	44	43	0
551050012013001	44	43	0
551050012022009	44	43	3
551050012022063	44	43	0
551050012022070	44	43	0
551050012022071	44	43	6
551050014002015	44	43	0
551050014002053	44	43	0
551050014002054	44	43	0
551050014002055	44	43	0
551050014002056	44	43	0
551050014002057	44	43	0
551050014002069	44	43	3
551050014002085	44	43	8

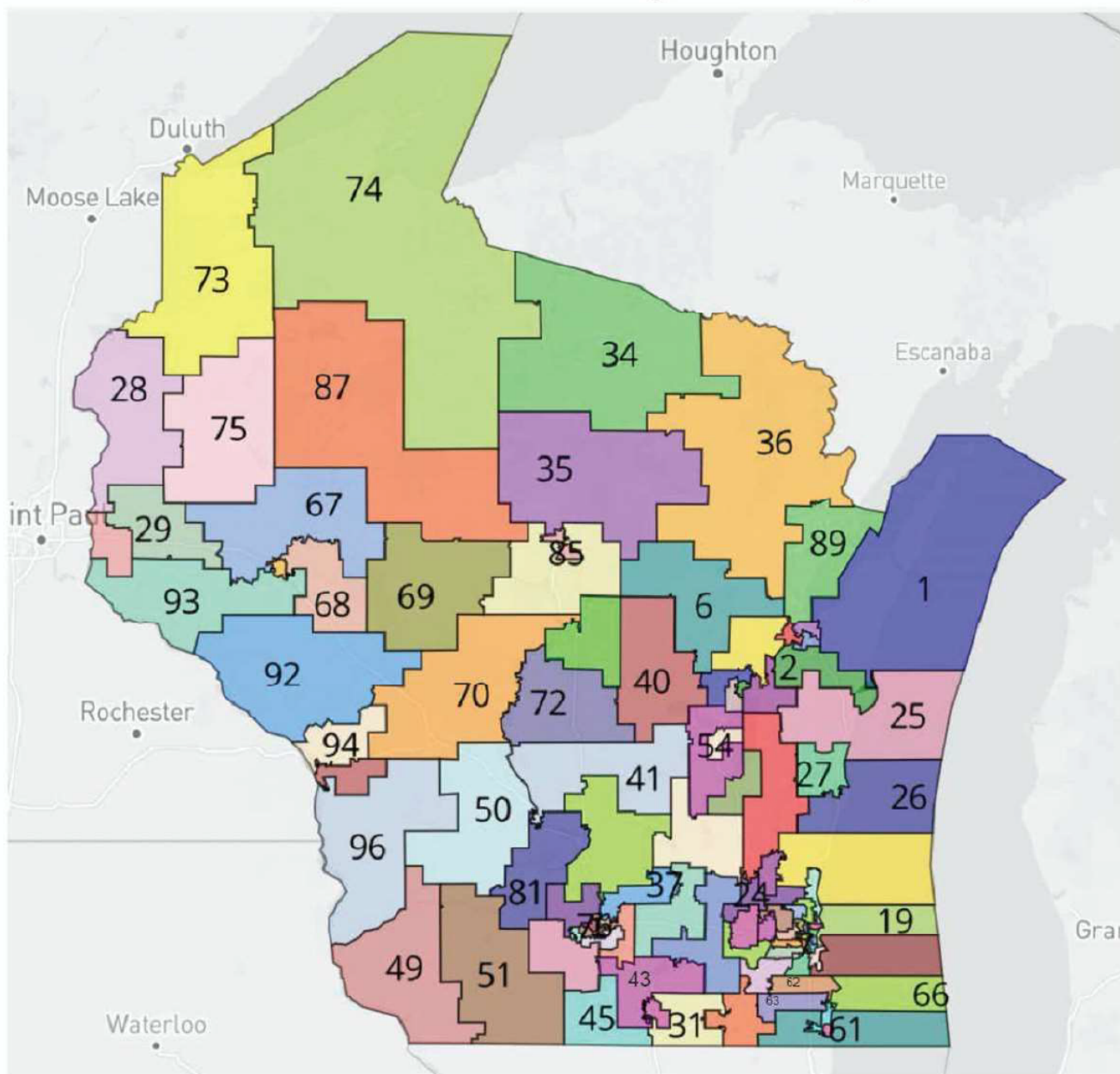
## Governor's Corrected Least Changes Assembly Map

Census Block Comparison List			
Census Block ID	Assigned District in Submitted Governor's Least Changes Assembly Map	Assigned District in Corrected Governor's Least Changes Assembly Map	Population in Census Block
551050028002029	45	43	0
551110001021009	81	41	0
551110001021026	81	41	0
551110001021027	81	41	0
551110001021031	81	41	0
551110001021041	41	81	0
551110001021044	41	81	0
551110001021048	81	41	0
551110001022002	81	41	14
551110001022014	81	41	0
551110001022017	81	41	0
551110001022019	81	41	0
551110001022021	81	41	0
551110001022022	81	41	5
551110001022023	81	41	0
551110001022026	81	41	0
551110001022027	81	41	0
551110001031038	81	41	16
551110001031044	41	81	0
551110001031045	41	81	0
551110001031068	41	81	18
551110001031069	41	81	6
551110001031075	41	81	0
551110001031076	41	81	0
551110001031084	81	41	0
551110001031110	81	41	0
551110001041003	41	81	0
551110001041025	41	81	0
551110001041026	81	41	0
551110001041057	81	41	0
551110001041059	41	81	0
551110001041073	81	41	0
551110001041074	81	41	0
551110001041099	41	81	0
551110002002060	41	81	1
551170004002033	26	27	0
551170004002078	26	27	0
551259400002027	74	34	0
551259506011145	74	34	0
551270003014029	31	43	0
551270007012022	31	32	0
551270007012026	31	32	0

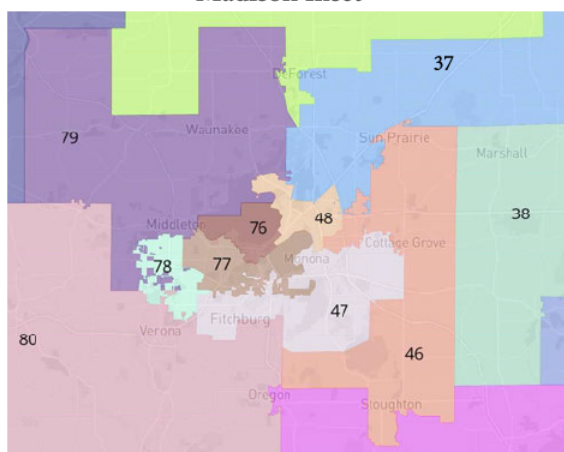
## Governor's Corrected Least Changes Assembly Map

Census Block Comparison List			
Census Block ID	Assigned District in Submitted Governor's Least Changes Assembly Map	Assigned District in Corrected Governor's Least Changes Assembly Map	Population in Census Block
551314401052001	24	58	0
551314401052002	24	58	0
551314601011056	58	24	0
551332032001007	99	98	1
551332032001008	99	98	0
551332032001009	99	98	0
551332032001010	99	98	0
551332033031010	99	22	18
551332033031014	99	22	8
551332033031026	99	98	0
551332033031027	99	22	6
551332033031028	99	22	17
551332033031029	99	22	5
551332033031030	99	22	0
551332033031040	99	98	0
551332033031041	99	98	0
551332033032005	99	98	4
551332033032016	99	98	0
551332033032017	99	98	11
551332034051032	22	99	17
551332034051034	22	99	8
551332034051040	22	99	15
551332034051041	22	99	4
551332034051044	22	99	0
551332034051045	99	22	0
551332034051051	22	99	0
551332034051053	99	22	12
551332039022011	97	83	0
551332040031009	97	99	0
551332040031024	97	99	0
551332041001042	97	99	0
551332041001043	97	99	3
551390023003021	53	55	15
551410104002016	86	69	0
Total Population Moved in Correction:			339

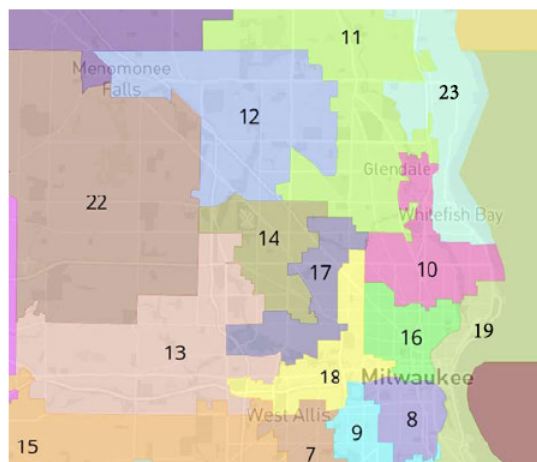
# Governor's Least Changes Assembly



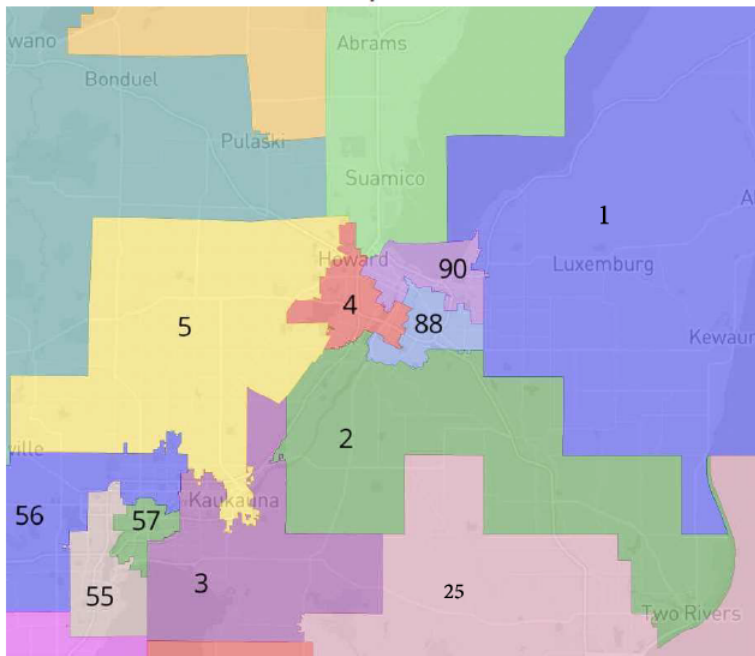
Madison Inset



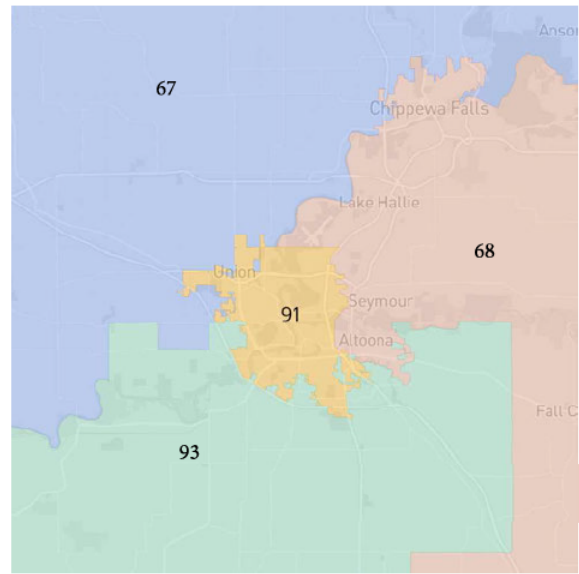
Milwaukee Inset



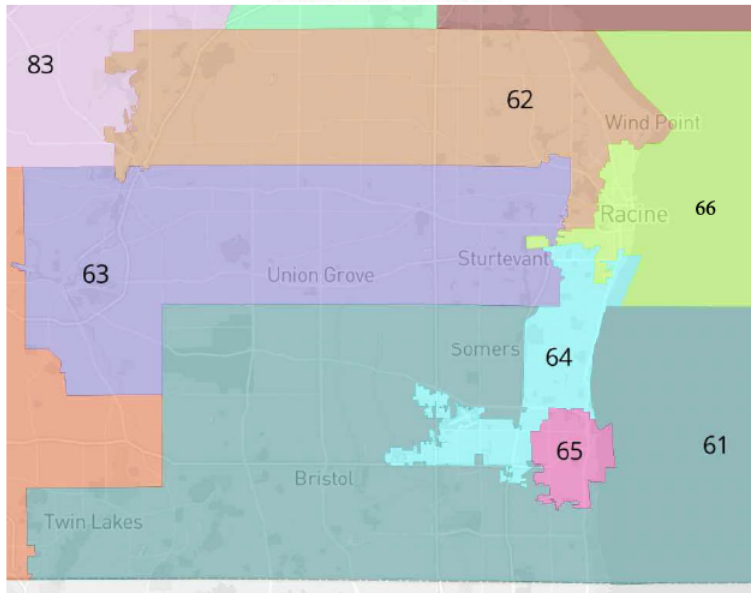
**Green Bay Area Inset**



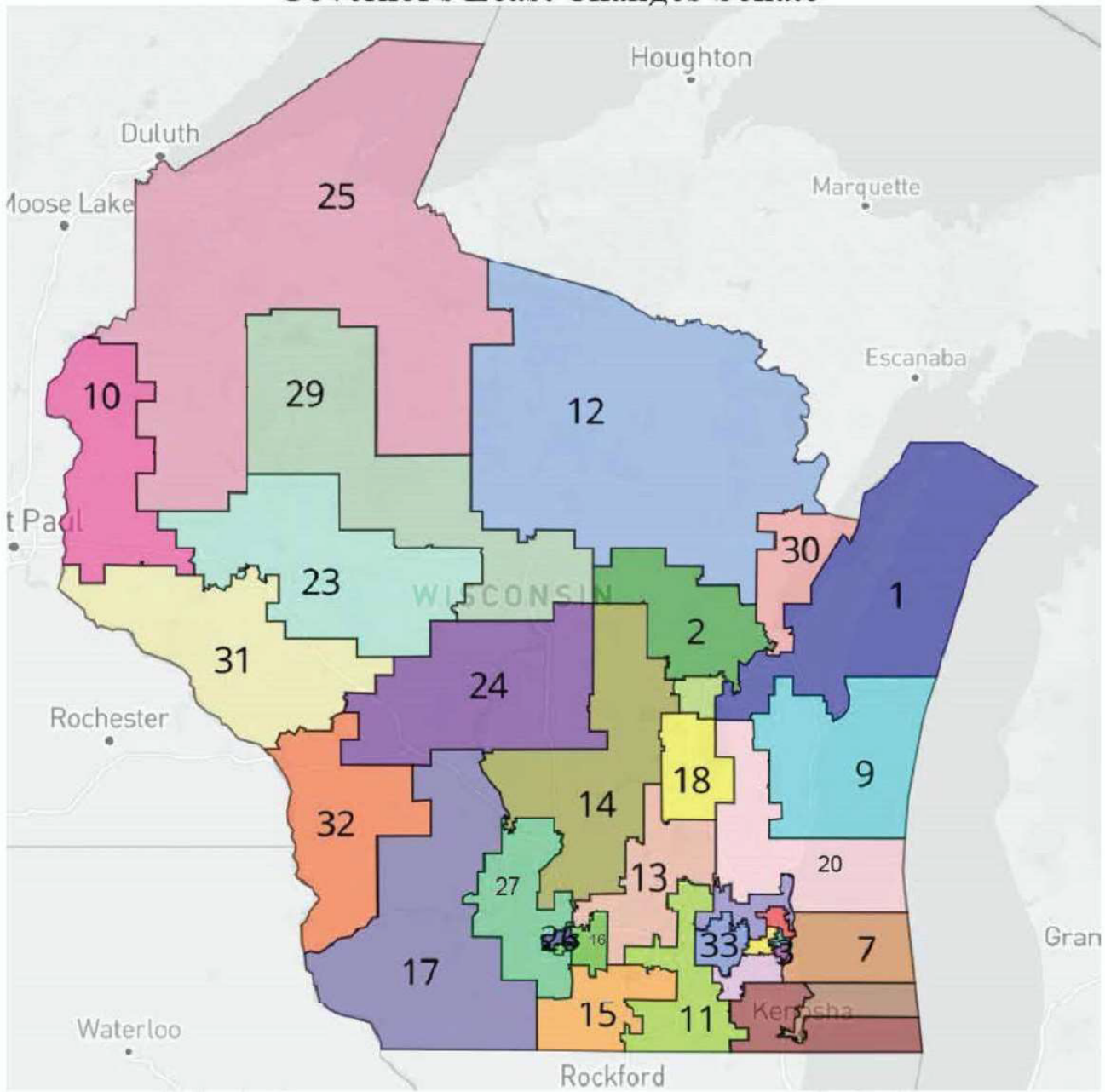
**Eau Claire/Chippewa Falls Inset**



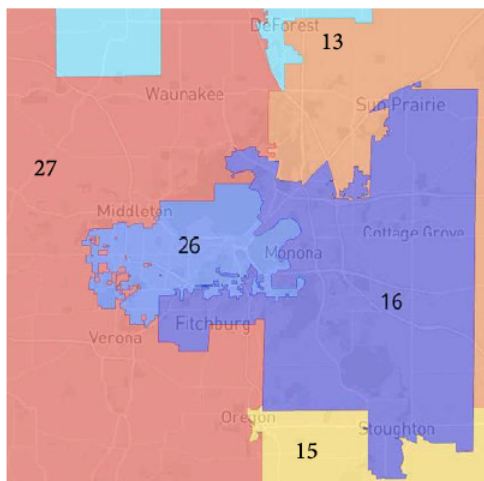
**Southeast WI Inset**



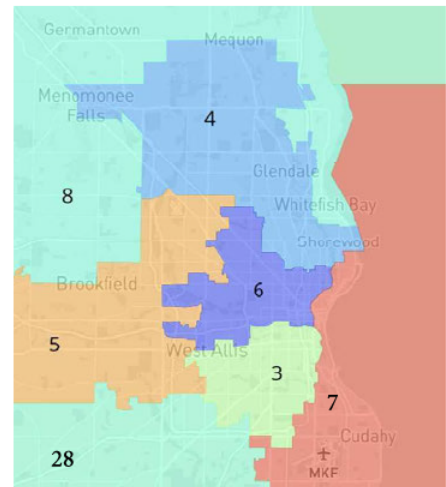
### Governor's Least Changes Senate



Madison Inset

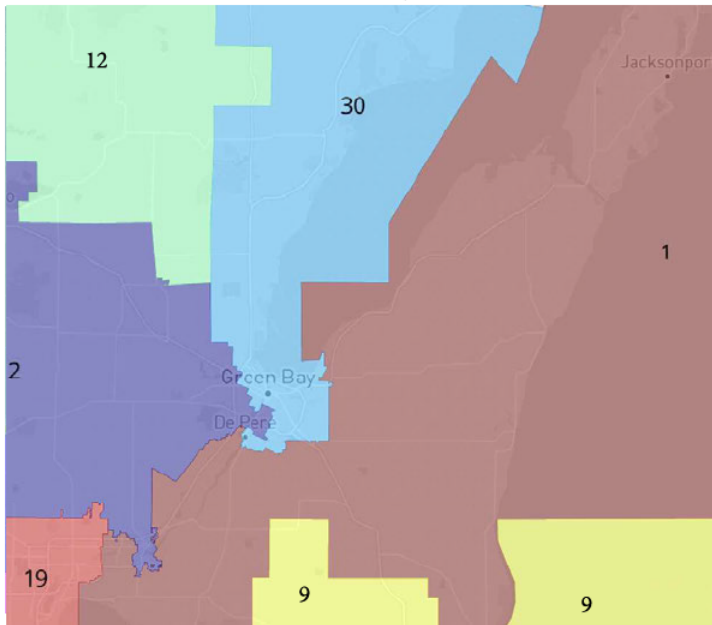


Milwaukee Inset

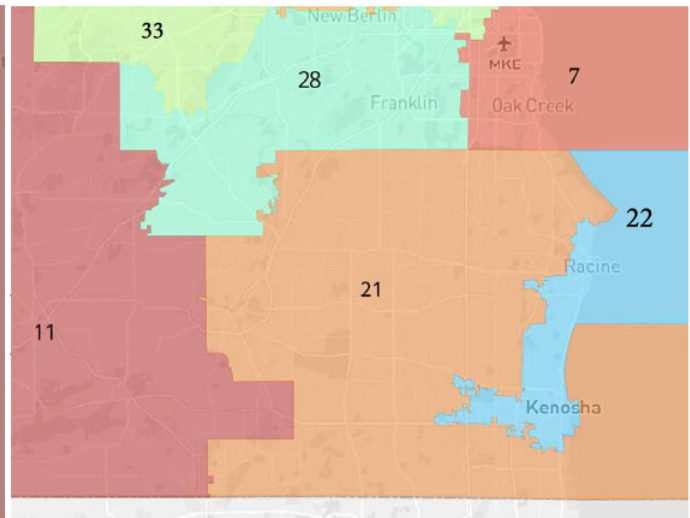




Green Bay Inset



Southeast WI Inset



# Supplemental Report in Support of Governor Evers's Proposed Corrected State Legislative District Plans

Jeanne Clelland

January 5, 2022

## 1 Introduction

My qualifications were described in my first report [1]. I have been retained to evaluate the Governor's proposed district plans for the Wisconsin State Assembly, the Wisconsin State Senate, and the U.S. House of Representatives (a.k.a. "Congress"), regarding their statistical properties.

This report will focus on Governor Evers's Proposed Corrected State Legislative District Plans, referred to here as the "Corrected Governor's Plans" for the State Assembly and State Senate. (The originally submitted Governor's plans will be referred to as the "Original Governor's Plans.") Statistics for the Corrected Governor's Plans will be presented, along with comparisons to the Original Governor's Plans and the Legislature's plans (referred to here as the "SB 621 Plans") for some measures.

The only meaningful changes in the Corrected Governor's Plans to any of the results presented in my first two reports for the Original Governor's Plans are in the numbers of town splits and all municipal splits. The Corrected Governor's Plans split many fewer towns and municipalities than the Original Governor's Plans; detailed comparisons are presented in Tables 7 and 8 in Section 6.

## 2 Population Deviation

According to the 2020 Census, Wisconsin's total population is 5,893,718. Since Wisconsin has 99 State Assembly districts and 33 State Senate districts, the ideal district populations are 59,533 for State Assembly districts and 178,598 for State Senate districts.

Tables 1 and 2 show the mean, maximum positive/negative, and overall deviations from these ideal populations for each of the Corrected Governor's Plans, in both absolute and percentage terms.

<b>State Assembly</b>	Corrected Governor's Plan	
<b>Deviation from Ideal Population</b>	Persons	Percentage
Mean Deviation	281	0.47%
Largest Positive Deviation	584	0.98%
Largest Negative Deviation	-537	-0.90%
Overall Range in Deviation	± 1,121	±1.88%

Table 1: Population Deviation for Governor's State Assembly District Plan

<b>State Senate</b>	Corrected Governor's Plan	
<b>Deviation from Ideal Population</b>	Persons	Percentage
Mean Deviation	449	0.25%
Largest Positive Deviation	1,112	0.62%
Largest Negative Deviation	-1,042	-0.58%
Overall Range in Deviation	± 2,138	± 1.20%

Table 2: Population Deviation for Governor's State Senate District Plan

### 3 Core Population Movement

**Core population movement** measures the number of persons who are moved to a different district when redistricting takes place, i.e., persons whose district number in the 2011 enacted plan is different from their district number in the new plan.

In my previous reports [1], [2], I discussed the discrepancies between the Census Bureau's and the LTSB's assignments of 2020 Census blocks to 2011 enacted districts, and the (small) impact of these discrepancies on the computation of core population movement. As in my second report [2], here I will report statistics for core population movement relative to the LTSB's version of the 2011 enacted districts.

Total core population movement values for the Corrected Governor's Plans, in both absolute and percentage terms, are shown in Table 3, along with data for the Original Governor's Plans and the SB 621 Plans to provide context.

	Corrected Gov. Plans		Original Gov. Plans		SB 621 Plans	
<b>Core Pop. Movement</b>	Persons	Percentage	Persons	Percentage	Persons	Percentage
State Assembly Plans	837,426	14.21%	837,659	14.21%	933,604	15.84%
State Senate Plans	461,029	7.82%	461,228	7.83%	459,061	7.79%

Table 3: Core Population Movement

For a more detailed analysis by district, Tables 9, 10, and 11 in Appendix A show, for each Assembly district, how many persons were moved out of or into that district between the 2011 enacted plan

and either the Corrected Governor’s Plan or the SB 621 Plan. Table 12 in Appendix A shows the analogous data for each Senate district.

This data is also depicted graphically in Figures 1 (Assembly) and 2 (Senate), as follows: Districts in the Corrected Governor’s Plans and the SB 621 Plans were each sorted from lowest to highest movement either out of or into the district, and the resulting sorted lists of numbers of persons moved in each district are plotted. (Note that the sorted ordering of the districts is not the same in both plans.)

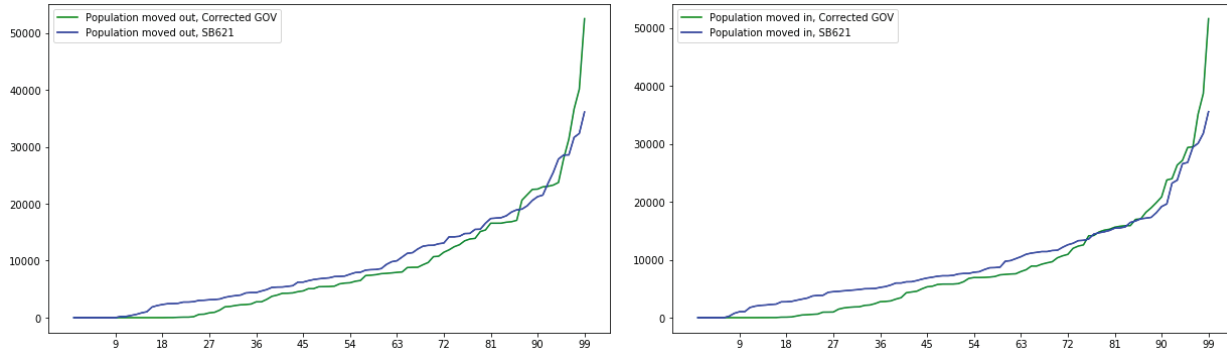


Figure 1: Sorted core population movement by district, State Assembly

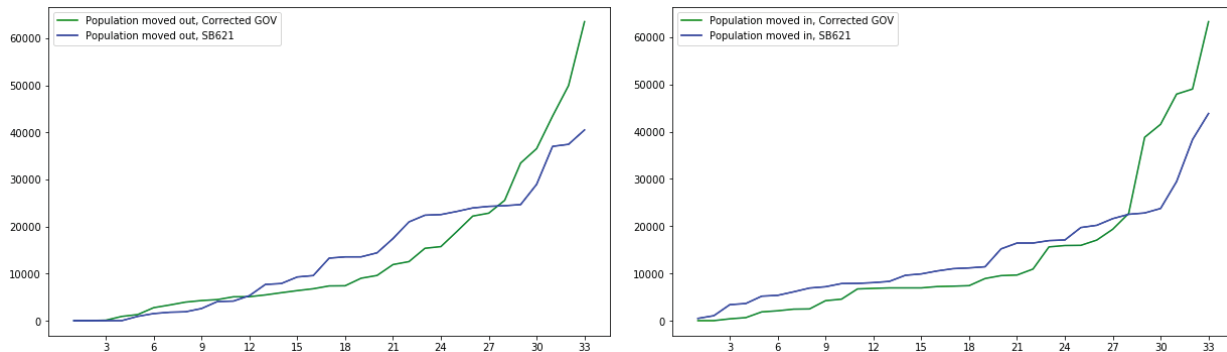


Figure 2: Sorted core population movement by district, State Senate

These plots illustrate that, while the districts with the greatest movement in the Corrected Governor’s Plan have higher movement than the districts with the greatest movement in the SB 621 Plan, the movement in most districts is slightly lower in the Corrected Governor’s Plan than in the SB 621 Plan, resulting in lower total core population movement in the Corrected Governor’s Plan.

## 4 Disenfranchised Population

**Disenfranchised population** measures the number of persons from odd-numbered State Senate districts who are moved to even-numbered State Senate districts. These voters would have been eligible to vote in a State Senate election in 2022 if they had not been moved, but they will now not be able to vote in a State Senate election until 2024.

As for core population movement, I will report statistics for the disenfranchised population relative to the LTSB's version of the 2011 enacted districts. The disenfranchised population for the Corrected Governor's Senate Plan, in both absolute and percentage terms, is shown in Table 4, along with data for the Original Governor's Plan and the SB 621 Plan to provide context.

	Corrected Gov. Plan		Original Gov. Plan		SB 621 Plan	
<b>Disenfranchised Pop.</b>	Persons	Percentage	Persons	Percentage	Persons	Percentage
State Senate Plans	139,606	2.37%	139,677	2.37%	138,753	2.35%

Table 4: Disenfranchised Population

## 5 Compactness

In my previous reports [1], [2], I discussed the well-known Polsby-Popper and Reock compactness scores, as well as the cut edges score. As I emphasized in those reports, the Polsby-Popper and Reock scores are extremely sensitive to differences in map projections and resolutions, and scores reported here may differ from those computed using different map projections. For my computations, I have used the map projection NAD\_1983\_Wisconsin\_TM\_US\_Ft (WKID 102219), which is the base projection in the shapefiles provided by the LTSB at <https://legis.wisconsin.gov/ltsb/gis/data/>.

The mean, maximum, and minimum of the Polsby-Popper and Reock scores for the each of the Corrected Governor's Plans are shown in Tables 5 and 6, along with the cut edges scores. (Note that Polsby-Popper and Reock scores are computed for each individual district, while the cut edges score is a single score for an entire district plan.) Values for the Original Governor's Plans are included for comparison.

<b>State Assembly</b>	Corrected Gov. Plan			Original Gov. Plan		
<b>Compactness Scores</b>	Mean	Max	Min	Mean	Max	Min
Polsby-Popper	0.250	0.523	0.057	0.251	0.523	0.056
Reock	0.397	0.652	0.147	0.397	0.652	0.147
Cut Edges	18,449			18,441		

Table 5: Compactness Scores for State Assembly District Plans

<b>State Senate</b>	Corrected Gov. Plan			Original Gov. Plan		
<b>Compactness Scores</b>	Mean	Max	Min	Mean	Max	Min
Polsby-Popper	0.216	0.431	0.053	0.217	0.433	0.053
Reock	0.392	0.607	0.135	0.392	0.607	0.135
Cut Edges	11,150			11,147		

Table 6: Compactness Scores for State Senate District Plans

## 6 Municipal Splits

**Municipal splits** measure the number of municipalities (cities, towns, or villages) that are split between two or more districts. The numbers of towns split and all municipalities split for the Corrected Governor's Plans are shown in Tables 7 and 8, along with the values for the Original Governor's Plans and both versions of the 2011 enacted plans for comparison. (Based on the analysis in Section 3 of [2], I believe that comparison with the Census Bureau's version is more appropriate.)

<b>Town Splits</b>	Corrected Gov.	Original Gov.	2011 (Census)	2011 (LTSB)
State Assembly	50	80	89	36
State Senate	32	55	55	20

Table 7: Town Splits

<b>Municipal Splits</b>	Corrected Gov.	Original Gov.	2011 (Census)	2011 (LTSB)
State Assembly	115	174	188	125
State Senate	76	118	123	84

Table 8: Municipal Splits

## 7 Previous Expert Testimony and Compensation

This information remains the same as in my initial report [1]. I have not served as an expert witness in any other case in the past 4 years. I am being compensated at the rate of \$250 per hour for my work on this case.

## References

- [1] Jeanne Clelland, *Expert Report in Support of Governor Evers's Proposed District Plans*, Expert report to Wisconsin Supreme Court for Johnson v. Wisconsin Election Commission, 2021, available at <https://www.wicourts.gov/courts/supreme/origact/2021ap1450.htm>.
- [2] \_\_\_\_\_, *Response Report in Support of Governor Evers's Proposed District Plans*, Expert report to Wisconsin Supreme Court for Johnson v. Wisconsin Election Commission, 2021.

## A Core Population Movement by District

This Appendix contains tables that describe the core population movement by district in the Corrected Governor's Plans and the SB 621 Plans.

- Tables 9, 10, and 11 show the core population movement by district in the Corrected Governor's and SB 621 Assembly plans.
- Table 12 shows the core population movement by district in the Corrected Governor's and SB 621 Senate plans.

District	Corrected Governor's Plan			SB 621 Plan		
	Moved out	Moved in	Total moved	Moved out	Moved in	Total moved
1	0	0	0	390	0	390
2	6,522	2,754	9,276	14,189	11,145	25,334
3	8,844	6,774	15,618	8,340	6,184	14,524
4	0	946	946	6,227	7,147	13,374
5	7,717	295	8,012	19,051	11,270	30,321
6	0	2,185	2,185	9,348	11,405	20,753
7	16,578	17,053	33,631	7,622	7,843	15,465
8	0	5,425	5,425	0	5,363	5,363
9	5,425	7,572	12,997	5,363	7,622	12,985
10	7,447	14,134	21,581	6,482	13,357	19,839
11	23,724	29,495	53,219	7,911	13,291	21,202
12	23,267	26,356	49,623	6,809	9,741	165,50
13	22,512	20,848	43,360	32,334	30,106	62,440
14	52,488	51,636	104,124	36,104	35,577	71,681
15	13,483	15,781	29,264	21,514	23,745	45,259
16	4,694	10,333	15,027	0	5,975	5,975
17	22,960	27,151	50,111	3,139	7,231	10,370
18	12,794	18,967	31,761	7,208	13,567	20,775
19	5,462	2,422	7,884	2,736	0	2,736
20	20,626	23,773	44,399	0	2,736	2,736
21	16,843	18,204	35,047	0	1,045	1,045
22	21,570	19,874	41,444	18,544	17,070	35,614
23	1,968	506	2,474	20,580	19,187	39,767
24	36,628	35,150	71,778	27,839	26,805	54,644
25	4,267	5,874	10,141	4,921	6,395	11,316
26	0	973	973	1,864	2,811	4,675
27	17	1	18	2,306	2,722	5,028
28	0	0	0	14,182	14,651	28,833
29	5,086	3,203	8,289	18,933	16,691	35,624
30	3,203	0	3,203	14,761	11,589	26,350
31	610	9	619	23,583	23,222	46,805
32	0	0	0	12,685	12,844	25,529
33	15,112	15,890	31,002	25,488	26,570	52,058

Table 9: Persons Moved in State Assembly Districts (Districts 1-33)



District	Corrected Governor's Plan			SB 621 Plan		
	Moved out	Moved in	Total moved	Moved out	Moved in	Total moved
34	4,558	3,448	8,006	6,911	5,628	12,539
35	4,343	7,002	11,345	3,859	6,986	10,845
36	2,778	4,558	7,336	6,986	8,714	15,700
37	40,112	38,718	78,830	8,612	6,843	15,455
38	31,354	29,390	60,744	10,639	8,612	19,251
39	7,851	9,229	17,080	6,683	7,930	14,613
40	2,296	4,977	7,273	5,377	7,545	12,922
41	3,740	5,800	9,540	15,493	17,186	32,679
42	10,700	11,967	22,667	14,283	15,493	29,776
43	87	91	178	31,642	31,823	63,465
44	91	621	712	3,561	4,697	8,258
45	0	1,466	1,466	5,605	7,633	13,238
46	23,057	16,967	40,024	17,403	11,636	29,039
47	3,958	128	4,086	6,237	2,175	8,412
48	27,918	24,001	51,919	11,292	7,231	18,523
49	2,779	4,429	7,208	0	1,756	1,756
50	5,445	6,203	11,648	3,738	4,481	8,219
51	8,795	10,924	19,719	1,037	3,835	4,872
52	0	6	6	5,305	5,036	10,341
53	6,123	7,103	13,226	5,487	6,643	12,130
54	172	2,796	2,968	220	2,335	2,555
55	9,676	7,532	17,208	7,236	4,781	12,017
56	11,895	6,928	18,823	14,794	9,846	24,640
57	7,546	9,458	17,004	3,179	4,630	7,809
58	0	1	1	4,673	5,227	9,900
59	5,930	6,929	12,859	9,817	11,406	21,223
60	1	0	1	10	0	10
61	15	0	15	578	0	578
62	7,390	8,898	16,288	7,304	8,307	15,611
63	0	16	16	3,273	3,015	6,288
64	2,133	4,297	6,430	3,027	4,543	7,570
65	0	2,117	2,117	0	2,117	2,117
66	4,282	7,390	11,672	3,965	7,304	11,269

Table 10: Persons Moved in State Assembly Districts (Districts 34-66)

District	Corrected Governor's Plan			SB 621 Plan		
	Moved out	Moved in	Total moved	Moved out	Moved in	Total moved
67	16,580	15,618	32,198	16,578	15,657	32,235
68	16,756	14,809	31,565	17,886	15,445	33,331
69	5,522	8,276	13,798	7,970	10,184	18,154
70	8,017	9,652	17,669	2,730	3,853	6,583
71	0	1,673	1,673	2,123	3,743	5,866
72	0	1,874	1,874	2,516	4,371	6,887
73	0	566	566	9,984	10,944	20,928
74	0	0	0	4,408	4,985	9,393
75	566	1,849	2,415	4,335	4,999	9,334
76	22,565	10,676	33,241	12,052	0	12,052
77	10,778	7,963	18,741	8,420	4,863	13,283
78	7,947	460	8,407	13,094	5,980	19,074
79	15,391	5,323	20,714	28,556	18,132	46,688
80	12,448	5,797	18,245	21,238	15,058	36,296
81	1,901	956	2,857	17,546	17,320	34,866
82	2,256	1,782	4,038	12,966	12,581	25,547
83	13,912	15,112	29,024	28,567	29,434	58,001
84	7,772	7,465	15,237	19,634	19,641	39,275
85	11,478	12,355	23,833	0	1,027	1,027
86	16,579	15,878	32,457	3,056	2,276	5,332
87	840	2,890	3,730	841	3,200	4,041
88	17,084	14,185	31,269	15,524	12,150	27,674
89	939	0	939	2,803	1,988	4,791
90	13,803	15,269	29,072	4,400	6,201	10,601
91	60	81	141	216	255	471
92	0	0	0	8,452	8,640	17,092
93	1,327	16	1,343	17,478	16,448	33,926
94	8,832	5,793	14,625	2,466	0	2,466
95	6,062	6,950	13,012	0	755	755
96	5,081	5,727	10,808	2,443	3,383	5,826
97	9,287	12,558	21,845	11,403	14,441	25,844
98	2,391	0	2,391	12,541	10,524	23,065
99	6,380	8,899	15,279	12,699	14,825	27,524

Table 11: Persons Moved in State Assembly Districts (Districts 67-99)

District	Corrected Governor's Plan			SB 621 Plan		
	Moved out	Moved in	Total moved	Moved out	Moved in	Total moved
1	15,366	9,528	24,894	22,529	16,939	39,468
2	6,771	2,480	9,251	14,402	9,598	24,000
3	9,006	17,053	26,059	0	7,843	7,843
4	33,474	49,021	82,495	0	15,187	15,187
5	63,501	63,283	126,784	24,269	23,745	48,014
6	25,558	41,561	67,119	0	16,426	16,426
7	5,462	6,930	12,392	0	1,045	1,045
8	43,440	38,804	82,244	20,971	17,070	38,041
9	4,267	6,831	11,098	4,064	6,901	10,965
10	5,086	0	5,086	24,652	19,707	44,359
11	15,722	15,899	31,621	37,447	38,327	75,774
12	895	4,224	5,119	1,783	5,355	7,138
13	49,927	47,947	97,874	13,550	11,001	24,551
14	9,598	15,606	25,204	17,438	22,509	39,947
15	85	2,085	2,170	40,498	43,843	84,341
16	36,530	22,693	59,223	24,410	10,520	34,930
17	6,376	10,913	17,289	1,880	7,177	9,057
18	3,321	6,931	10,252	5,305	8,307	13,612
19	11,909	6,710	18,619	9,574	3,622	13,196
20	5,930	6,929	12,859	9,273	11,406	20,679
21	7,405	8,914	16,319	7,882	8,049	15,931
22	16	7,405	7,421	910	7,882	8,792
23	7,371	7,216	14,587	23,937	22,789	46,726
24	4,470	9,652	14,122	1,503	6,101	7,604
25	0	1,849	1,849	7,690	9,891	17,581
26	22,827	636	23,463	23,194	471	23,665
27	22,209	4,545	26,754	37,013	20,183	57,196
28	18,926	19,345	38,271	28,945	29,434	58,379
29	5,064	7,290	12,354	2,572	5,178	7,750
30	2,754	382	3,136	13,547	11,159	24,706
31	1,290	0	1,290	22,393	21,590	43,983
32	3,937	2,432	6,369	4,154	3,383	7,537
33	12,536	15,935	28,471	13,276	16,423	29,699

Table 12: Persons Moved in State Senate Districts