

**No. 2021AP1450-OA**

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**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.**

**SECOND AFFIDAVIT OF CONGRESSMAN BRYAN STEIL**

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STATE OF Washington DC )  
COUNTY OF Washington DC ) ss.

Congressman Bryan Steil, being duly sworn on oath, deposes  
and says:

1. I am a duly elected member of the U.S. House of Representatives, representing Wisconsin's First Congressional District.

2. I also reside in the First Congressional District and am a registered voter there.

3. I plan to run for reelection to the U.S. House of Representatives in 2022 to continue to serve as the Representative of Wisconsin's District 1.

4. As District 1's duly elected Representative, I have both a substantial interest in this District and a significant relationship with my constituents.

5. Further, given my duty as a Congressman to, among other things, serve my constituents and support legislation in Congress

that will be to their benefit, I have invested substantial time and resources to understand their needs.

6. The Governor's proposed congressional map for Wisconsin ("Governor's Map"), which this Court recently adopted as Wisconsin's remedial redistricting map, makes a number of significant changes to District 1, which changes add significant new communities into District 1.

7. Given that these communities were not a part of District 1 under Wisconsin's prior congressional map, I have not previously represented these communities in the U.S. House of Representatives.

8. Further, given my intent to run for reelection in District 1, I must now expend this significant time and resources, so that I may develop the requisite close relationship with these communities and secure their vote as their representative in the U.S. House of Representatives in 2022.

9. Further, the Governor's Map is unconstitutionally malapportioned, meaning that I would now be running and voting in an unconstitutional congressional district.

FURTHER AFFIANT SAYETH NOT

*B. Steil*  
\_\_\_\_\_  
REP. BRYAN STEIL

SWORN AND SUBSCRIBED BEFORE ME

This 7<sup>th</sup> day of March, 2022

*Michael J. Orrick*  
\_\_\_\_\_

Notary Public,

State of District of Columbia



Michael J. Orrick  
Notary Public, District of Columbia  
My Commission Expires 4/30/2023

My Commission expires: \_\_\_\_\_