

VIDEOTAPE DEPOSITION OF ADAM R. FOLTZ 12/21/2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA,
CARLENE BECHEN, RONALD BIENDSEIL,
RON BOONE, VERA BOONE, ELVIRA BUMPUS,
EVANJELINA CLEEREMAN, SHEILA COCHRAN,
LESLIE W. DAVIS III, BRETT ECKSTEIN,
MAXINE HOUGH, CLARENCE JOHNSON,
RICHARD KRESBACH, RICHARD LANGE,
GLADYS MANZANET, ROCHELLE MOORE,
AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS,
JEANNE SANCHEZ-BELL, CECELIA SCHLIEPP,
and TRAVIS THYSSEN,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE,
and RONALD KIND,

Intervenor-Plaintiffs,

v. File No. 11-CV-562

Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:
MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,

[Caption Continued]
VIDEOTAPE DEPOSITION
ADAM R. FOLTZ

Madison, Wisconsin
December 21, 2011

Susan C. Milleville, Court Reporter

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and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA,
JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v. Case No. 11-CV-1011
JPS-DPW-RMD

Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:
MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,
and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

Defendants.

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3	30 December 13, 2011 expert report of Ronald Keith Gaddie, Ph.D.	158
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8	(The original exhibits were attached to the original transcript and copies were provided to counsel)	
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25	(The original deposition transcript was filed with Attorney Douglas M. Poland)	

VIDEOTAPE DEPOSITION OF ADAM R. FOLTZ 12/21/2011

1 VIDEOTAPE DEPOSITION of ADAM R. FOLTZ, a
 2 witness of lawful age, taken on behalf of the
 3 Plaintiffs, wherein Alvin Baldus, et al., are
 4 Plaintiffs, and Members of the Wisconsin Government
 5 Accountability Board, et al., are Defendants, pending
 6 in the United States District Court for the
 7 Eastern District of Wisconsin, pursuant to subpoena,
 8 before Susan C. Milleville, a Court Reporter and
 9 Notary Public in and for the State of Wisconsin, at
 10 the offices of Godfrey & Kahn, S.C., Attorneys at
 11 Law, One East Main Street, in the City of Madison,
 12 County of Dane, and State of Wisconsin, on the 21st
 13 day of December 2011, commencing at 10:21 in the
 14 forenoon.
 15
 16
 17 A P P E A R A N C E S
 18
 19 DOUGLAS M. POLAND, Attorney,
 20 for GODFREY & KAHN, S.C., Attorneys at Law,
 21 One East Main Street, Suite 500, Madison,
 22 Wisconsin 53703, appearing on behalf of
 23 Plaintiffs Alvin Baldus, et al.
 24
 25 PETER G. EARLE, Attorney,
 26 for LAW OFFICE OF PETER EARLE, LLC, Attorneys at Law,
 27 839 North Jefferson Street, Suite 300,
 28 Milwaukee, Wisconsin 53202, appearing by
 29 telephone on behalf of Plaintiffs
 30 Voces De La Frontera, Inc., et al.

1 A P P E A R A N C E S (Continued)
 2
 3 P. SCOTT HASSETT and JAMES A. OLSON, Attorneys,
 4 for LAWTON & CATES, S.C., Attorneys at Law,
 5 Ten East Doty Street, Suite 400, Madison,
 6 Wisconsin 53703, appearing on behalf of the
 7 Intervenor-Plaintiffs.
 8
 9 MARIA S. LAZAR, Assistant Attorney General,
 10 for STATE OF WISCONSIN DEPARTMENT OF JUSTICE,
 11 17 West Main Street, Madison, Wisconsin 53703,
 12 appearing on behalf of the Defendants.
 13
 14 DANIEL KELLY, Attorney,
 15 for REINHART BOERNER VAN DEUREN S.C.,
 16 Attorneys at Law, 1000 North Water Street,
 17 Suite 2100, Milwaukee, Wisconsin 53202,
 18 appearing on behalf of the Defendants.
 19
 20 THOMAS L. SHRINER, JR., Attorney,
 21 for FOLEY & LARDNER, LLP, Attorneys at Law,
 22 777 East Wisconsin Avenue, Milwaukee,
 23 Wisconsin 53202, appearing on behalf of the
 24 Intervenor-Defendants.
 25
 26 ERIC M. MCLEOD, Attorney,
 27 for MICHAEL BEST & FRIEDRICH LLP, Attorneys at Law,
 28 One South Pinckney Street, Suite 700, Madison,
 29 Wisconsin 53703, appearing on behalf of the
 30 Wisconsin State Senate by its Majority Leader
 31 Scott Fitzgerald, the Wisconsin Assembly by its
 32 Speaker Jeff Fitzgerald, and Adam R. Foltz.
 33
 34 Also present: Todd S. Campbell, CLVS
 35 Campbell Legal Video Company
 417 Heather Lane, Suite B
 Fredonia, WI 53021
 (262) 447-2199

1 MR. KELLY: Mr Hassett, before you
 2 begin, could we have the same agreement with
 3 respect to objections; that is, that an
 4 objection made by one attorney will stand as
 5 an objection for all attorneys without the
 6 necessity of going around the table and
 7 joining in?
 8 MR. HASSETT: Sure.
 9 MR. KELLY: Is that acceptable to
 10 all other counsel?
 11 MR. POLAND: Yes.
 12 MS. LAZAR: Yes.
 13 MR. SHRINER: Sure.
 14 MR. KELLY: Thank you.
 15
 16 ADAM R. FOLTZ,
 17 called as a witness, being first duly sworn,
 18 testified on oath as follows:
 19
 20 EXAMINATION
 21 By Mr. Hassett:
 22 Q Good morning, Mr. Foltz. My name is
 23 Scott Hassett. I represent the intervenor
 24 plaintiffs, Moore, Kind and Baldwin. I'm going to
 25 ask you a few questions. This is really

1 Mr. Poland's deposition, and I think he will cover
 2 some of the ground much more thoroughly than I do
 3 on some of the background questions. If you don't
 4 understand a question, please state that.
 5 Understand that for purposes of the court reporter
 6 you can't nod your head. You do have to give an
 7 answer.
 8 A Understood.
 9 Q First of all, where are you employed?
 10 A The Wisconsin State Assembly.
 11 Q And how long have you been employed there?
 12 A Since January of 2007.
 13 Q And what did you do prior to that?
 14 A Various political work, campaign work.
 15 Q And who do you report to currently in the
 16 assembly?
 17 A Speaker Fitzgerald.
 18 Q And that would be Jeff Fitzgerald?
 19 A Correct.
 20 Q Tell me what your basic job duties are.
 21 A Speaker Fitzgerald tasked me with drafting the
 22 legislation that ultimately became Wisconsin
 23 Act 43.
 24 Q Did you have any involvement in Act 44?
 25 A Not in drawing of the map but in facilitating the

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1 drafting.
 2 Q Okay. Who did draw that map?
 3 A I don't know.
 4 Q Well, you were involved in facilitating the
 5 drafting of the map?
 6 A Correct.
 7 Q Explain what that means.
 8 A We received a file, a block assignment file I
 9 believe is the correct term, which was then turned
 10 over to LRB for drafting.
 11 Q And who sent that to you? Where did you receive
 12 it from?
 13 MR. McLEOD: I'm going to insert an
 14 objection. Insofar as it calls for
 15 information subject to the attorney-client
 16 privilege, I would instruct the witness not
 17 to answer. To the extent he has an answer
 18 that does not implicate the attorney-client
 19 privilege, he's free to answer.
 20 Q Can you tell me who sent you that file?
 21 A I received it from legal counsel.
 22 Q And you're going to follow the instructions of
 23 your counsel and not answer that --
 24 A Correct.
 25 Q -- specific question in any more detail?

9

1 A Correct.
 2 Q Thank you.
 3 MR. McLEOD: I'm going to insert an
 4 objection to the extent that there wasn't a
 5 pending question separate from the question
 6 asked. So my objection stood with respect to
 7 the first question.
 8 Q Do you have some experience in redistricting
 9 matters?
 10 A This is my first go-round with redistricting.
 11 Q And when did you first begin working on that?
 12 A I was originally assigned the job duty sometime in
 13 2009 I believe.
 14 Q In your earlier political career did you have any
 15 involvement in redistricting?
 16 A No.
 17 Q Now, I'm going to show you Exhibit 10 and refer
 18 you to Page 5, and that would be -- on that page
 19 is Paragraph 10, and you have been identified as a
 20 person who was involved in drawing the
 21 redistricting maps --
 22 A Uh-huh.
 23 Q -- that were signed into law August 9, 2011. And
 24 I'm paraphrasing, but you're described as an
 25 individual who reviewed the 2010 census and

10

1 assisted in determining the appropriate
 2 constitutional boundaries for the state and
 3 congressional districts as memorialized in Act 43
 4 and 44. Is that a true statement?
 5 A I just want to make sure I'm reading that.
 6 MR. McLEOD: Can I have that
 7 question read back, please.
 8 (The following was read by the reporter:
 9 Q "Now, I'm going to show you Exhibit 10 and
 10 refer you to Page 5, and that would be -- on
 11 that page is Paragraph 10, and you have been
 12 identified as a person who was involved in
 13 drawing the redistricting maps that were signed
 14 into law August 9, 2011. And I'm paraphrasing,
 15 but you're described as an individual who
 16 reviewed the 2010 census and assisted in
 17 determining the appropriate constitutional
 18 boundaries for the state and congressional
 19 districts as memorialized in Act 43 and 44. Is
 20 that a true statement?")
 21 MR. McLEOD: I'm going to object to
 22 the form of the question, but to the extent
 23 you understand the question, please feel free
 24 to answer it.
 25 A I would say more specifically that I was tasked

11

1 with Act 43 in the drawing aspects of it, and I'll
 2 refer to my previous answer on facilitating
 3 drafting of Act 44.
 4 Q Explain what you mean by facilitating again if you
 5 would.
 6 A The block assignment file was given to LRB. A
 7 draft was returned.
 8 Q Were you involved in the exchange of any data or
 9 statistics with anyone for purposes of
 10 congressional redistricting?
 11 MR. McLEOD: I'm going to object to
 12 the form of the question.
 13 To the extent you can answer, please do
 14 so.
 15 A Can you rephrase that question?
 16 Q Listen, at some point I believe you testified you
 17 turned some materials over to the LRB --
 18 A Uh-huh.
 19 Q -- that you received from counsel.
 20 A Uh-huh.
 21 Q Prior to that did you have any involvement in
 22 congressional redistricting?
 23 A No.
 24 Q You were not involved in the exchange of any data
 25 or statistics or material of that nature for

12

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1 congressional redistricting?
 2 MR. McLEOD: I'm going to object to
 3 the form the question. It's compound.
 4 If you can answer the question, please
 5 do so.
 6 A I did not exchange any data. I want to be careful
 7 here. I did not exchange any data with anyone
 8 involved in the congressional redistricting.
 9 Q Now, you worked on redistricting. At what work
 10 sites did you perform this work?
 11 A What do you mean?
 12 Q Did you work in your offices in the capitol
 13 building, at offices of legal counsel or anywhere
 14 else? What was the physical --
 15 A Offices of legal counsel.
 16 Q Okay. All of your redistricting work was done at
 17 offices of legal counsel?
 18 A Outside of the public testimony.
 19 Q And what offices was that?
 20 A The offices of Michael Best & Friedrich.
 21 Q And approximately how much time did you spend in
 22 the course of this project?
 23 A I don't know.
 24 Q Was it a matter of days? Weeks? Months?
 25 A I don't know. It was my job.

13

1 Q It was over a period of months?
 2 A Yes.
 3 Q Now, during the time you were doing this work did
 4 you ever observe any congressional redistricting
 5 maps, draft, final or otherwise?
 6 A No.
 7 Q Did you hear anybody talking about any
 8 congressional redistricting matters?
 9 A No.
 10 Q Did you engage in any conversations with anybody
 11 about congressional redistricting?
 12 A Yes.
 13 Q Who was that?
 14 A Andy Speth.
 15 Q Andy who?
 16 A Speth.
 17 Q How do you spell that?
 18 A I believe it's S-p-e-t-h.
 19 Q And who is he?
 20 A Chief of staff to Congressman Paul Ryan.
 21 Q What was the nature of that conversation?
 22 A Primarily regarding the legislative time line for
 23 action.
 24 Q Aside from counsel that may have been involved in
 25 legislative redistricting, do you have knowledge

14

1 of anybody -- strike that. Aside from counsel
 2 that were involved in congressional redistricting,
 3 do you know of anyone else who was involved in
 4 congressional redistricting?
 5 A No.
 6 Q Any congressional staffers that you were aware of?
 7 A Not outside of my previous answer.
 8 Q Now, you did testified at the hearing in July,
 9 correct?
 10 A Yes.
 11 Q I'm referring to Exhibit 19 which is a transcript
 12 of those proceedings. On Page 18 you described
 13 economic and social interests, correct?
 14 A Where are you looking?
 15 Q Let me find the line. That would be Lines 11 and
 16 12. 10 through 13 I should say.
 17 A Uh-huh.
 18 Q Yes?
 19 A Yes.
 20 Q What do you mean by common economic and social
 21 interests in terms of redistricting?
 22 A I believe that is one way of defining communities
 23 of interest.
 24 Q And what's your understanding of communities of
 25 interest? How do you define that?

15

1 A There are multiple ways you can define it.
 2 Q What's your understanding of it?
 3 A Well, again, there are multiple definitions of it.
 4 It's a very nebulous term.
 5 Q Give me one of the definitions.
 6 A Well, what I say here in Lines 10 through 13 I
 7 think could be interpreted as one definition of
 8 it.
 9 Q Do you have any other understandings or
 10 definitions of community of interest?
 11 A It could be anything from a school district to a
 12 political subdivision. It's a very open-ended
 13 term.
 14 Q What's your understanding of compactness, the term
 15 compactness, as it relates to redistricting?
 16 A There are multiple measures of compactness used to
 17 evaluate compactness of a district.
 18 Q And what are they to your knowledge?
 19 A I couldn't list them off the top of my head.
 20 Q What about the term core retention as it relates
 21 to community of interest? What's your
 22 understanding of that?
 23 A They're two different things.
 24 Q And what are they, please?
 25 A Core retention is traditionally the amount of --

16

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1 the number of constituents carried over from a
2 previously existing district to the new district
3 as I understand it.
4 Q How is core retention used in redistricting?
5 A To evaluate the number of constituents from an old
6 district that are carried over to the new
7 district.
8 MR. HASSETT: I have nothing
9 further. Thank you.

EXAMINATION

10 By Mr. Poland:

11 Q Mr. Foltz, my name is Doug Poland, and I represent
12 the plaintiffs in the case. I'll be asking you
13 some questions probably for a little while.
14 You're here today pursuant to a subpoena, correct?
15 A Yes.

16 MR. POLAND: Let's go ahead and
17 mark this as Exhibit 23.
18 (Exhibit No. 23 marked for
19 identification)

20 Q Mr. Foltz, I've handed you a copy of a document
21 that has been marked as Deposition Exhibit 23. Do
22 you have that in front of you?
23 A Yes, I do.

17

1 Q Do you see this is a subpoena for your testimony
2 at our deposition here today?
3 A Uh-huh.
4 Q Have you seen this document before?
5 A Yes.
6 Q When did you receive it?
7 A I don't recall.
8 Q Do you see that the cover letter is dated
9 December 13, 2011?
10 A I do see that.
11 Q You received it sometime on or after December 13th
12 then?
13 A I don't recall.
14 Q Who gave you Exhibit 23?
15 A Eric McLeod.
16 Q And Mr. McLeod is representing you here today,
17 correct?
18 A Correct.
19 Q You testified before that your employer is the
20 Wisconsin State Assembly?
21 A Correct.
22 Q It's not any particular person within the state
23 assembly; is that right?
24 A I work for Speaker Fitzgerald.
25 Q Is he technically your employer?

18

1 A Well, technically I am on the payroll of the
2 assembly chief clerk and assigned to the speaker.
3 Q How long have you worked at the state assembly?
4 A What was my previous answer? January of 2007 I
5 believe.
6 Q I would like you to turn to the last page of --
7 I'm sorry. Not the last page. The second to the
8 last page of Exhibit 23. It has a heading at the
9 top that says Exhibit A.
10 A Uh-huh.
11 Q Do you see that on that page that is headed
12 Exhibit A there are five different enumerated
13 paragraphs asking you to produce certain
14 materials?
15 A Uh-huh.
16 Q And did you in fact look for all of the materials,
17 search for all of the materials that are
18 identified in the five paragraphs in Exhibit A?
19 A Yes, I did.
20 Q And you brought some materials with you this
21 morning; is that correct?
22 A That is correct.
23 Q Let's go ahead and mark those as an exhibit and
24 get that on the record. Can you hand me the stack
25 that is underneath, the whole thing. We have two

19

1 disks as well?
2 A Right.
3 (Exhibit Nos. 24 through 27 marked for
4 identification)
5 Q Mr. Foltz, I'm first going to hand you a document
6 that's been marked Exhibit No. 24, and the caption
7 of the document says Documents Produced in
8 Response to Subpoena Issued by Plaintiffs to
9 Adam Foltz. I'm handing you that document now.
10 Is that a document that you have seen before?
11 A Yes.
12 Q When did you first see that document?
13 A A day ago. Two days ago potentially.
14 Q Did you assist in preparing that document?
15 A Yes.
16 Q What work did you do in assisting to prepare that
17 document?
18 A Produced the documents.
19 Q So you identified the documents that you had that
20 were responsive to the subpoena?
21 A Correct.
22 Q Were you asked to comment at all on the
23 preparation of Exhibit 24?
24 A No.
25 Q When you saw Exhibit 24, did you see it in the

20

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1 final form if you know?
 2 A I don't know.
 3 Q Were you asked to review the responses in
 4 Exhibit 24 to comment on whether they were correct
 5 and accurate?
 6 MR. McLEOD: I'm going to assert
 7 attorney-client privilege. To the extent
 8 there were conversations between counsel and
 9 Mr. Foltz with respect to the preparation of
 10 this document or commenting on the document,
 11 I'm going to instruct him not to answer.
 12 Q And are you going to follow counsel's instruction
 13 not to answer the question?
 14 A Yes.
 15 Q Take a look at the first page of Exhibit 24,
 16 please.
 17 A Uh-huh.
 18 Q The Item Number One that's identified in there is
 19 a July 7, 2011 E-mail. Do you see that?
 20 A Yes.
 21 Q And then Item Number Two also identifies another
 22 July 7, 2011 E-mail correspondence. Do you see
 23 that?
 24 A Yes.
 25 Q You have gone through and there are I think

1 through Paragraph Number Six -- those are all
 2 identified E-mail exchanges, correct?
 3 A It appears so, yes.
 4 Q In addition to those E-mails that are identified
 5 in Paragraphs One through Six, are there any other
 6 E-mails that you located when you searched your
 7 records?
 8 A Yes.
 9 Q All right. Have those been produced today?
 10 A Yes, they have.
 11 Q Are there any E-mails that you had in your
 12 possession, custody or control that were requested
 13 in the subpoena, which is Exhibit 23, that you
 14 have not either produced here today or that have
 15 not been identified in Exhibit 24?
 16 A No.
 17 Q I would like you to look at Exhibit -- I'm sorry.
 18 Paragraph Number Seven in Exhibit 24, please.
 19 That identifies a category of documents. It
 20 states, "Documents used during meetings between
 21 Legislative Staff Member Adam Foltz and state
 22 representatives including memoranda analyzing
 23 population changes of each district enumerated in
 24 the 2010 census, maps illustrating the analysis of
 25 the district population changes over the decade,

1 maps confirming the physical location of members'
 2 residence and new district analysis." Do you see
 3 that description?
 4 A Yes, I do.
 5 Q Are there any documents that fall within that
 6 description that you have produced here today?
 7 A Not to my knowledge.
 8 Q Did you search for all such documents described in
 9 that Paragraph Seven that were within your
 10 possession, custody and control?
 11 A Yes.
 12 Q All right. So anything that you had that fell
 13 within that description either is being withheld
 14 from production pursuant to the objections stated
 15 in Exhibit 24 --
 16 A Uh-huh.
 17 Q -- or was produced?
 18 A I believe so, yes.
 19 Q But there is nothing that you're producing in that
 20 category today; is that correct?
 21 A That's my -- yes.
 22 Q I would like you to look at Item Number Eight,
 23 please.
 24 A Uh-huh.
 25 Q This is on Exhibit 24. That identifies political

1 analysis of draft/final maps compared to current
 2 districts. Do you see that?
 3 A Yes, I do.
 4 Q Did you produce any materials falling into that
 5 category today in the documents you brought with
 6 you?
 7 A No.
 8 Q Did you in fact search for all documents falling
 9 into that category within your possession, custody
 10 and control?
 11 A Yes.
 12 Q And so anything that you would have had in your
 13 possession, custody or control is being withheld
 14 from production pursuant to Exhibit 24?
 15 A Correct.
 16 Q Look at Paragraph Number Nine, please, Demographic
 17 Analysis of Minority Population
 18 Trends/Proportionality.
 19 A Uh-huh.
 20 Q Did you produce any documents or materials falling
 21 within that category today?
 22 A Yes.
 23 Q What have you produced that is described in
 24 Paragraph Nine here today?
 25 A I'm sorry. I think I got a little too much into a

1 rhythm there. Go back to the question regarding
2 Number Nine.
3 Q Sure. Paragraph Number Nine, and this is in
4 Exhibit 24, describes documents falling into the
5 category of demographic analysis of minority
6 population trends/proportionality.
7 A Uh-huh.
8 Q Did you in fact search the records that were
9 within your possession, custody or control for
10 materials falling under that document category?
11 A Yes, I did.
12 Q Did you bring any documents falling within that
13 category with you today?
14 A No.
15 Q So any documents that you identified within your
16 possession, custody or control are being withheld
17 from production pursuant to the objections stated
18 in Exhibit 24?
19 A Correct.
20 Q Did you in fact locate any documents when you were
21 looking that fall within that category?
22 A Yes.
23 Q I should go back, actually, and ask you the same
24 question with respect to Paragraph Number Eight.
25 Did you in fact identify any documents when you

25

1 looked that fall into the category of political
2 analysis of draft/final maps compared to current
3 districts?
4 A Yes.
5 Q Did you identify any documents within your
6 possession, custody or control that fall within
7 the description of Paragraph Number Seven?
8 A Yes.
9 Q I would like to draw your attention to Paragraph
10 Ten of Exhibit 24 which identifies a category of
11 materials, spreadsheets analyzing census and
12 election data. Do you see that?
13 A Yes.
14 Q And you looked for documents that fell within that
15 category?
16 A Correct.
17 Q Did you identify any such documents?
18 A Yes.
19 Q Are you producing any documents today that fall
20 within that category of materials?
21 A No.
22 Q So any documents that you have within your
23 possession, custody or control are being withheld
24 pursuant to the objections that are stated in
25 Exhibit 24?

26

1 A Yes.
2 MR. SHRINER: You are being
3 summoned into the hallway by your assistant.
4 MR. POLAND: Okay. I'll go out
5 there in just a minute. Thank you.
6 Q Paragraph Number 11 identifies a category of
7 documents, maps incorporating census and elections
8 data. Do you see that?
9 A Yes.
10 Q Did you look for documents falling within that
11 category?
12 A Yes.
13 Q Did you identify any documents?
14 A Yes.
15 Q Did you produce any documents falling within that
16 category today at your deposition?
17 A No.
18 Q So any documents that you identified that fall
19 within the category of Paragraph 11 are being
20 withheld pursuant to the objections stated in
21 Exhibit 24?
22 A Yes.
23 Q And the last category of documents that are
24 identified in Exhibit 24 are in Paragraph 12, and
25 that identifies a category of draft maps prepared

27

1 by Legislative Staff Member Adam Foltz.
2 A Yes.
3 Q Did you look for any such documents?
4 A Yes, I did.
5 Q Did you identify any such documents?
6 A Yes.
7 Q Are you producing any of those documents today?
8 A No.
9 Q So any documents that are described in
10 Paragraph 12 are being withheld from production
11 based on the grounds identified in Exhibit 24?
12 A Correct.
13 MR. POLAND: Let me take just a
14 break for a second here.
15 (Recess)
16 Q Mr. Foltz, I would like to ask you to take a look
17 at Exhibit No. 25, please. I'm handing that to
18 you now.
19 A Uh-huh.
20 Q This consists of a number of different written
21 documents that you brought with you this morning;
22 is that correct?
23 A That is.
24 Q Let's just take these one by one here from the
25 top. The very first document that's on the stack

28

1 that's included within Exhibit 25 is a document
 2 that states at the top 2011-12 Legislative
 3 Statistics and Maps SB 148. Do you have that in
 4 front of you?
 5 A Yes, I do.
 6 Q That is a stapled document? Is your copy stapled?
 7 A My copy is not stapled.
 8 Q Your copy is not stapled. How many pages is that
 9 first document? Is that four pages?
 10 A Yes.
 11 Q All right. What is that document?
 12 A This is the population deviation summary that is
 13 produced by LRB and attached as an addendum to the
 14 bill draft of SB 148.
 15 Q And then if you turn the page -- I'm sorry. If
 16 you go to the fifth page, it states at the top
 17 Memorandum SB 148 Memo Two. Do you see that?
 18 A Yes.
 19 Q What is that memorandum?
 20 A A summary of municipal splits contained within
 21 SB 128.
 22 Q Who prepared this document?
 23 A Either Tad Ottman or I.
 24 Q Do you recall who prepared it?
 25 A No.

29

1 Q Turn to the next page. There it says SB 148
 2 Memo Three dated July 15, 2011. What document is
 3 that?
 4 A Milwaukee County population trends and racial
 5 composition.
 6 Q Who prepared this document?
 7 A Either Tad Ottman or I.
 8 Q Did you prepare any such memorandums together?
 9 A I don't recall.
 10 Q Did anyone else assist in the preparation of this
 11 Memo Number Three?
 12 A No.
 13 Q It would have just been you or Mr. Ottman?
 14 A Correct.
 15 Q And Memo Number Two was the previous page. Same
 16 question. Did anyone assist in the preparation of
 17 Memo Two?
 18 A No.
 19 Q Do you know where you would have received the data
 20 that underlies the municipal splits information in
 21 Memo Two?
 22 A The autoBound software. And for the 2002 court
 23 map, it would have been the court decision.
 24 Q When you or Mr. Ottman prepared Memo Number Two,
 25 were you looking at a printed report from

30

1 autoBound to draw this information?
 2 A Printed or electronic. I don't recall which.
 3 Q And when you say or electronic, what do you mean?
 4 Do you mean you were looking at a computer screen
 5 or --
 6 A Yes.
 7 Q Where were you physically when you prepared
 8 Memorandum Number Two?
 9 A The offices of Michael Best & Friedrich.
 10 Q Did you produce any of these memos, and we will
 11 get to some other ones as well, any of these
 12 memorandums in conjunction with Senate Bill 148 at
 13 any location other than the offices of Michael
 14 Best & Friedrich?
 15 A No.
 16 Q Was anyone else present when you prepared
 17 Memorandum Number Two?
 18 A No.
 19 Q Where were you in Michael Best & Friedrich's
 20 offices when you prepared Memo Number Two?
 21 A I don't understand.
 22 Q Were you in an attorney's office? Were you in a
 23 conference room? Were you in the law library?
 24 A I was in an office.
 25 Q Was that an office that you alone were using?

31

1 A Tad Ottman and I.
 2 Q When did you first start using an office at
 3 Michael Best & Friedrich with respect to the
 4 redistricting?
 5 A I don't recall.
 6 Q How many months did you have an office at Michael
 7 Best & Friedrich where you were doing the
 8 redistricting?
 9 A I don't recall.
 10 Q When did you first start working on redistricting
 11 matters?
 12 A Can you elaborate?
 13 Q Sure. With respect to the 2011 redistricting,
 14 when were you first asked to work on that?
 15 A I believe it was in 2009 when the speaker asked me
 16 to begin performing preliminary tasks related to
 17 redistricting.
 18 Q And when did you first meet with somebody from
 19 Michael Best & Friedrich about the 2011
 20 redistricting?
 21 A I don't recall.
 22 Q Had you started working with Michael
 23 Best & Friedrich by February of 2011?
 24 A Yes.
 25 Q Had you started working out of Michael

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1 Best & Friedrich's offices in Madison by February
 2 2011?
 3 A Yes.
 4 Q Did you have a specific office that you and
 5 Mr. Ottman worked in at Michael Best & Friedrich
 6 by February 2011?
 7 A Yes.
 8 Q Did you have that same office through the end of
 9 the time that your work on the redistricting
 10 completed?
 11 A I'm sorry. Say that again.
 12 Q Sure. Did you and Mr. Ottman have a specific
 13 office that you worked in during the time that you
 14 worked on the 2011 redistricting?
 15 A Yes.
 16 Q That was an office that you both shared?
 17 A Yes.
 18 Q Were there computers in that office?
 19 A Yes.
 20 Q How many computers were there?
 21 A Three.
 22 Q Did you and Mr. Ottman each have your own computer
 23 in that office?
 24 A Yes.
 25 Q Who was the third computer for?

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1 A It wasn't assigned to anyone specifically. It was
 2 there in the event we needed an additional
 3 machine.
 4 Q Was there ever a time that anyone else was in that
 5 office with you and Mr. Ottman working?
 6 A Yes.
 7 Q Who else was in that office working with you and
 8 Mr. Ottman?
 9 A Legal counsel and experts.
 10 Q Who were the experts who were in that office
 11 working with you?
 12 A Dr. Keith Gaddie.
 13 Q Anyone else?
 14 A Joe Handrick.
 15 Q Anyone else?
 16 A Not to my knowledge.
 17 Q And you mentioned legal counsel was present in
 18 that office with you as well working on
 19 redistricting?
 20 A That is correct.
 21 Q Who were the specific legal counsel who were
 22 present with you?
 23 A Eric McLeod, Ray Taffora, Jim Troupis,
 24 Sarah Troupis, Michael Screnock, Sarah -- did I
 25 say Sarah Troupis?

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1 Q Yes.
 2 A I believe that's everyone.
 3 Q And who is Michael Screnock?
 4 A An attorney at Michael Best.
 5 Q Was Speaker Fitzgerald ever present in that office
 6 with you?
 7 A Yes.
 8 Q Was Senator Fitzgerald ever present in that office
 9 with you?
 10 A Yes.
 11 Q Was Robin Vos ever present in that office with
 12 you?
 13 A Yes.
 14 Q And what about Representative Zipperer?
 15 A I'm sorry?
 16 Q What about Mr. Zipperer, the senator? Was he ever
 17 present in the office with you?
 18 A Yes, he was.
 19 Q Were there any other legislators that were present
 20 in the office with you?
 21 A Not that I can recall. No. No.
 22 Q Was anyone else ever present in that office with
 23 you other than the people that you have mentioned
 24 while you were performing legislative
 25 redistricting work?

35

1 A I don't believe so. Actually, let me go back to
 2 it real quick. Representative Scott Suder.
 3 Q I want to take your attention back to Exhibit 25.
 4 A Uh-huh.
 5 Q We will look at a document that's titled Memo Four
 6 SB 148 dated July 13, 2011. Do you see that?
 7 A Memo Four?
 8 Q Yes.
 9 A Yes, I do.
 10 Q Who prepared that document?
 11 A Either Tad Ottman or I.
 12 Q Did anyone else work on the preparation of that
 13 document?
 14 A No.
 15 Q Memorandum Number Five is the next page. Who
 16 prepared that document?
 17 A Either Tad Ottman or I.
 18 Q And looking through the rest of these memos --
 19 let's say Six and Seven. Who prepared Memos Six
 20 and Seven?
 21 A Either Tad Ottman or I.
 22 Q Did anyone else assist you and Mr. Ottman in
 23 preparing any of these memos that we have looked
 24 at so far up through Memo Number Seven?
 25 A The only exception would be LRB Memo One is a

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1 report produced by LRB. Other than that it was
 2 Tad Ottman and I.
 3 Q After Memo Seven there's a document that says
 4 Hispanics for Leadership. Do you see that
 5 document?
 6 A I do.
 7 Q What is that document?
 8 A This was the testimony submitted by it appears
 9 Zeus Rodriguez as he gave it to the committee.
 10 Q And when was it submitted to the committee?
 11 A I don't know. I would believe it was on the day
 12 of the public hearing, but I don't know if it was
 13 submitted ahead of time or after the fact which
 14 can happen.
 15 Q Have you ever spoken with Mr. Rodriguez before?
 16 A I have not.
 17 Q Do you know whether Mr. Ottman ever spoke to
 18 Mr. Rodriguez?
 19 A I don't know.
 20 Q Do you know whether -- strike that question. Were
 21 you involved at all in asking Mr. Rodriguez to
 22 submit this letter to the committee?
 23 A I never spoke to Mr. Rodriguez.
 24 Q Does the next page that also has a caption at the
 25 top Hispanics for Leadership -- was that attached

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1 for Senator Zipperer's committee had in his
 2 possession.
 3 Q And when you say the entire packet, how far does
 4 that packet go? Is that all of the written
 5 materials that you produced today?
 6 A No.
 7 MR. McLEOD: I'm going to object to
 8 the form of the question. I'm not sure I
 9 understand it.
 10 To the extent you understand it, feel
 11 free to answer.
 12 Q Which of the documents that you have in front of
 13 you that I've marked as Exhibit No. 25 make up the
 14 packet that you just testified about?
 15 A The packet. I'm just looking for the end point
 16 here. I believe that the committee -- you're
 17 referring to the committee packet, I just want to
 18 make sure, the submitted testimony to the
 19 committee. I just want to be clear on that.
 20 Q Well, you had identified a packet that was in the
 21 possession of the clerk.
 22 A Yes.
 23 Q So that's what I'm asking you about.
 24 A Okay. To my understanding this is the last page
 25 of that.

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1 to the first page?
 2 A To the best of my knowledge.
 3 Q When was the first time that you saw this
 4 document?
 5 A Honestly, the first time I saw this document I
 6 believe was today. I heard his testimony, but I
 7 had not actually seen this prior to today.
 8 Q The next page is a memo from the Office of the
 9 Mayor of the City of Fitchburg. Do you see that?
 10 A Yes, I do.
 11 Q What is that document?
 12 A It appears to be his testimony to the committee.
 13 Q Have you ever spoken with Mayor Shawn Pfaff of the
 14 City of Fitchburg?
 15 A Yes.
 16 Q Have you spoken with the mayor about redistricting
 17 matters?
 18 A No.
 19 Q Had you seen this memo from the Office of the
 20 Mayor of the City of Fitchburg before today?
 21 A No.
 22 Q Why were you producing these two documents, the
 23 Hispanics for Leadership document and the City of
 24 Fitchburg memo today?
 25 A This is the entire packet that the committee clerk

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1 Q So the last page is -- can you identify that for
 2 the record.
 3 A I honestly don't --
 4 Q Is there a heading on it?
 5 A There's not a heading on it. It appears to be
 6 some type of plat map.
 7 Q Okay. All right. But at any rate, in the stack
 8 that you have got there that's Exhibit 25, that
 9 last page appears just before a table that says
 10 Disenfranchisement at the top?
 11 A That is correct.
 12 Q So beginning with Memo One and then through the
 13 document that you just identified, that is the
 14 packet that the clerk had?
 15 A Yes.
 16 Q Did you ask the clerk for documents and the clerk
 17 provided this to you?
 18 A I did not ask.
 19 Q Do you know who did ask the clerk for documents?
 20 A I don't know.
 21 Q All right. You can set that first part of
 22 Exhibit 25 to the side.
 23 A Okay.
 24 Q The next document in Exhibit 25 is a table that
 25 has a heading Disenfranchisement at the top. Do

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1 you see that?
 2 A Uh-huh.
 3 Q What is that document?
 4 A It's a summary of '92 and '02 court submissions
 5 summarizing the delayed voting or
 6 disenfranchisement in each of those submissions as
 7 a raw number and as a percentage of the total
 8 population at the time of the '90 and the '02
 9 census.
 10 Q Did you prepare this document?
 11 A It was either Tad Ottman or I.
 12 Q Turning your attention to the top table that says
 13 2002 Court Submissions. Do you see that?
 14 A Uh-huh.
 15 Q The first column says Plan?
 16 A Uh-huh.
 17 Q And then there are a number of different rows in
 18 that table?
 19 A Uh-huh.
 20 Q Do you see that? The first one says Plan JP1.
 21 What does that indicate?
 22 A I believe Jensen Panzer 1.
 23 Q And then the second row would be Jensen Panzer 2?
 24 A Correct.
 25 Q And then 3 for the next row down?

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1 A Yes.
 2 Q And then what is the AB 842?
 3 A AB 842 was the bill passed by the state assembly.
 4 Q And then the next one is Dem A?
 5 A Yes.
 6 Q And the next one SB 463?
 7 A Uh-huh.
 8 Q What does that indicate?
 9 A That is the redistricting plan passed by the state
 10 senate during the '02 redistricting cycle.
 11 Q And then what is the CCE row?
 12 A If memory serves, it's Citizens for Competitive
 13 Elections. It was Representative Fred Kessler's
 14 group. I believe that's what the acronym stands
 15 for, but I'm not 100 percent on that.
 16 Q WMC, is that Wisconsin Manufacturers and Commerce?
 17 A Correct.
 18 Q And then finally is the court plan that was
 19 actually adopted?
 20 A Yes.
 21 Q Why did you and Mr. Ottman put together the
 22 particular table with respect to the 2002 court
 23 submissions?
 24 A To look at where the various parties were ten
 25 years ago and also see where the court landed.

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1 Q All right. And why were you doing that?
 2 A To have a better understanding of redistricting.
 3 Q And specifically with respect to
 4 disenfranchisement?
 5 A Yes.
 6 Q What does disenfranchisement mean to you in the
 7 context of redistricting?
 8 A In the context of redistricting disenfranchisement
 9 or delayed voting is when you have staggered terms
 10 in the upper house an inevitable consequence of
 11 redistricting is going to be a six-year delay
 12 between state senate elections in this case if you
 13 move from an even to an odd numbered senate
 14 district.
 15 Q Where did you draw the data from that you included
 16 in the 2002 court submissions table that's on this
 17 page?
 18 A The court decision itself and the pleadings index.
 19 Q So it was the materials that were submitted in the
 20 2002 redistricting litigation?
 21 A That is correct.
 22 Q Did anyone request you and Mr. Ottman to prepare
 23 this table?
 24 A No.
 25 Q You decided to do it yourself?

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1 A Yes.
 2 Q Looking at the 1992 court submissions table --
 3 A Uh-huh.
 4 Q Do you see that? There are three rows in that,
 5 correct?
 6 A Yes.
 7 Q One was a plan submitted by -- it says Prosser
 8 IIIA?
 9 A Yes.
 10 Q And that was the republican plan?
 11 A Yes.
 12 Q And then the next one says -- that's a legislative
 13 or legislature plan?
 14 A Yes.
 15 Q And that was the democratic plan?
 16 A Correct.
 17 Q And then finally is the plan adopted by the Court?
 18 A Correct.
 19 Q Why did you prepare this table for the 1992 court
 20 submissions?
 21 A Same reason as the '02.
 22 Q Did anyone ask you to take a look specifically at
 23 the 1992 disenfranchisement numbers?
 24 A No.
 25 MR. McLEOD: Let me just insert an

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1 objection. To the extent that the question
2 asks for information which is within the
3 scope of the attorney-client privilege, I
4 would instruct the witness not to answer. To
5 the extent the question seeks to elicit
6 information about a conversation between
7 Mr. Foltz and somebody outside of the scope
8 of the attorney-client privilege, he's free
9 to answer. I just want to make sure that
10 that's clear. The questions have potentially
11 implicated the privilege. I just want to
12 make sure that that objection is asserted.

13 Q Are you going to --

14 MR. EARLE: Can I ask a clarifying
15 question on that?

16 MR. POLAND: Hold on, Peter, just
17 one second.

18 Q Are you going to follow counsel's instruction not
19 to answer questions with respect to privileged
20 conversations?

21 A Correct.

22 MR. EARLE: With regard to the
23 scope of privilege, we're talking about
24 communications not only with counsel but also
25 with Mr. Handrick? Is that correct or not

45

1 correct as you were asserting it here now?
2 MR. McLEOD: I'm asserting that the
3 privilege applies to communications with
4 attorney and client. If there is a specific
5 question that relates to conversations with
6 Mr. Handrick, we will deal with that at the
7 appropriate time.

8 MR. EARLE: Okay. Thank you.

9 Q You can set that to the side. Mr. Foltz, the
10 next -- there's a clipped package. My copy is
11 stapled. There's an E-mail on top that says From
12 Michael Keane to Adam Foltz dated Monday,
13 July 11th, and then there's some additional
14 materials that are attached to that I think
15 included within the packet that was clipped
16 together that you have.

17 A Uh-huh.

18 Q Correct? All right. What is that collection of
19 documents?

20 A Various E-mails regarding redistricting.

21 Q And are these E-mails that were in your
22 possession?

23 A Yes.

24 Q Do you have an E-mail account through your work at
25 the state assembly?

46

1 A Yes, I do.

2 Q Is that the E-mail account that these E-mails were
3 sent to?

4 A Yes.

5 Q So these E-mails were still on your computer at
6 the state assembly; is that correct?

7 A Yes.

8 Q Did you send or receive E-mails on the computer
9 you were working within at Michael
10 Best & Friedreich?

11 A I'm sorry. State that again.

12 Q Did you send or receive E-mails on the computer
13 that you were working with when you worked at
14 Michael Best & Friedrich?

15 A Yes.

16 Q Are any of those E-mails included within this
17 packet that you have produced today?

18 A Yes.

19 Q Are any of them within the clipped stack that you
20 have got in front of you?

21 A Yes.

22 Q Are you able to identify which ones you received
23 when you were at Michael Best & Friedrich versus
24 which ones you would have received or sent when
25 you were in your office at the capitol building?

47

1 A No.

2 Q The very first page says, "From Michael Keane" --

3 A Uh-huh.

4 Q -- to you. The date is July 11. Who is
5 Michael Keane?

6 A An employee of LRB.

7 Q You had asked Mr. Keane for this information?

8 A Yes.

9 Q Why did you ask Mr. Keane for this information?

10 A He is the person at LRB that is tasked with
11 districting to my knowledge.

12 Q And so why did you ask him for the specific
13 spreadsheet that was attached to this E-mail?

14 A I don't recall the specific reason.

15 Q Is the spreadsheet that Mr. Keane attached -- is
16 it among the materials that you produced here
17 today?

18 A Yes, it is.

19 Q Is that in one of the electronic documents or
20 documents on a CD or DVD?

21 A Yes.

22 Q The next page is also an E-mail from Mr. Keane,
23 and the subject is 2002 Redistricting Plan. Why
24 did you ask Mr. Keane for that?

25 A I'm sorry. Which E-mail is this?

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1 Q It's the second E-mail.
 2 A I don't recall why I specifically asked for that.
 3 Q Were you working at the Michael Best & Friedrich
 4 offices when you received these E-mails from
 5 Mr. Keane?
 6 A I don't recall.
 7 Q Do you know whether these E-mails were printed
 8 from your E-mail account at the state capitol
 9 building or at Michael Best & Friedrich?
 10 A Say that again.
 11 (Question read)
 12 A The clipped packet is all of the same E-mail
 13 account. It's the state legislative E-mail
 14 account.
 15 Q When you accessed E-mail when you were at Michael
 16 Best & Friedrich, was that through Web Mail
 17 basically accessing your state assembly E-mail
 18 account?
 19 A Uh-huh. Either Web Mail, OWA, as we call it, or a
 20 VPN connection.
 21 Q The third page is an E-mail from
 22 Tony Van Der Wielen to you dated July 11th. Do
 23 you see that?
 24 A Yes.
 25 Q And who is Tony Van Der Wielen?

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1 A If he -- somebody requested it from him.
 2 Q Do you know who requested it from him?
 3 A No. It was either Tad or I since we were both
 4 included in the To field with the forwarding
 5 E-mail attached.
 6 Q The next page is an E-mail from Mr. Van Der Wielen
 7 May 25, 2011 to you and to Mr. Ottman, correct?
 8 A Uh-huh.
 9 Q It says Slow Assignments.
 10 A Uh-huh.
 11 Q What is meant by slow assignments?
 12 A I would assume it was an issue we were having with
 13 the software.
 14 Q What software?
 15 A AutoBound 9.
 16 Q What is autoBound 9?
 17 A It is the redistricting software.
 18 Q When you say 9, is that a version number?
 19 A Correct.
 20 Q Where did you get that software from?
 21 A LTSB.
 22 Q When was it provided to you?
 23 A I don't recall.
 24 Q Were you trained on it?
 25 A Yes.

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1 A He is the GIS division, I believe it's referred to
 2 as a division, lead for LTSB. He deals with all
 3 of the geographic information systems.
 4 Q And that forwards an E-mail from Tony
 5 Van Der Wielen to a number of other people dated
 6 Wednesday, April 14, 2010. Do you see that?
 7 A Uh-huh.
 8 Q Who are the other people who are identified either
 9 in the To or the CC lines of the April 2010
 10 E-mail?
 11 A Okay. Tad Ottman and Michael Keane we have
 12 already discussed. Jeff Ylvisaker is the director
 13 of LTSB. Gratz@speedymail.org I believe is
 14 Joel Gratz, a democratic expert on redistricting.
 15 MWhite@theshopconsulting is Mike White, a democrat
 16 expert who works at The Shop Consulting which is a
 17 lobbying firm. Adam Foltz is obviously me. CC to
 18 legislative GIS staff. That would be the
 19 employees that work under Tony Van Der Wielen. I
 20 am not sure who Lori is, and I'm not sure who the
 21 Wisconsin.edu E-mail address is.
 22 Q Do you know why Mr. Van Der Wielen was forwarding
 23 this to you?
 24 A No, I don't.
 25 Q Was it something that you requested?

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1 Q Who gave you the training?
 2 A LTSB.
 3 Q When were you trained?
 4 A Over last summer and last fall I believe.
 5 Q When you say last, do you mean 2010 or 2011?
 6 A When was that? I believe there was training in
 7 2010 and some training in 2011.
 8 Q Had you used autoBound before the 2011
 9 redistricting?
 10 A No.
 11 Q Did you contact Mr. Van Der Wielen very often with
 12 technical questions about the software?
 13 A Yes.
 14 Q Did you contact anyone else other than
 15 Mr. Van Der Wielen with technical questions about
 16 using the software?
 17 A Yes.
 18 Q Who else did you talk to with technical questions
 19 about the software?
 20 A Ryan Squires, an employee of Tony Van Der Wielen.
 21 Q So Mr. Squires is also with the LTSB?
 22 A The GIS team at LTSB. Correct.
 23 Q Did anyone other than Mr. Van Der Wielen or
 24 Mr. Squires give you advice on the technical
 25 aspects of autoBound 9 software?

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1 A Possibly Jeff Ylvisaker I believe is his name,
2 another employee of Tony Van Der Wielen at LTSB.
3 Potentially Dana Wolff as well who is another
4 member of the GIS team.
5 Q Did anyone outside of LTSB ever give you technical
6 advice or consult with you on the use of autoBound
7 software?
8 A No.
9 Q It looks like there are a number of additional
10 E-mails here from Mr. Van Der Wielen to you and to
11 Mr. Ottman, correct?
12 A Yes.
13 Q And do those all have to do with your use and
14 Mr. Ottman's use of the autoBound 9 software?
15 A A good number of them. I don't want to say all.
16 Q Let's take a look. There is an E-mail, and it has
17 at the bottom of the printed Page 29. I should
18 ask -- by the way, I see that there are page
19 numbers at the bottom of some of these. Do you
20 know why there are these page numbers?
21 A No, I don't.
22 Q And I note that the first E-mail that we talked
23 about has a page number at the bottom of 14.
24 A Uh-huh.
25 Q And then it skips to 17?

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1 says, "Tad and Adam, here is the new data base and
2 report for disenfranchisement." Do you see that?
3 A Uh-huh.
4 Q Is that something that you had requested?
5 A I believe so.
6 Q Why did you request that?
7 A It was a more streamlined way of reporting
8 disenfranchisement.
9 Q More streamlined than what?
10 A Than the core constituency report.
11 Q And the core constituency report, is that
12 something that we have already looked at?
13 A No.
14 Q All right. Who produces a core constituency
15 report?
16 A AutoBound 9 produces the core constituency report.
17 Q And so had you printed core constituency reports
18 for the purposes of legislative redistricting?
19 A I don't recall.
20 Q This is a different type of a report that
21 autoBound would print; is that correct?
22 A Yes. This is a custom report that was put
23 together by LTSB that is outside of the standard
24 autoBound 9 package.
25 Q Something that you and Mr. Ottman couldn't do

55

1 A Uh-huh.
2 Q And then 15 and 16 and 27 and 28?
3 A Uh-huh.
4 Q Do you know how that pagination got onto these
5 pages?
6 A No.
7 Q Did you put that pagination there?
8 A No.
9 Q When you typically print E-mails, is their
10 pagination at the bottom?
11 A I don't know.
12 Q I'll refer to those page numbers because that
13 probably makes it easier for the purposes of the
14 record.
15 A Okay.
16 Q Did you assemble these pages, by the way, in this
17 particular order?
18 A I don't recall.
19 Q If you look at page -- it has Page 29 at the
20 bottom.
21 A Uh-huh.
22 Q Do you see that's an E-mail from Mr. Van Der
23 Wielen dated May 24th.
24 A Yes.
25 Q Do you see that? All right. It starts out and

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1 through autoBound 9?
2 A Could, but this is a more streamlined way of doing
3 it.
4 Q And did you in fact produce reports based on the
5 instructions here from Mr. Van Der Wielen?
6 A Yes.
7 Q Do you still have copies of those reports?
8 A No.
9 Q Those are not reports that are being withheld from
10 production today?
11 A No.
12 Q You simply don't have them anymore?
13 A Correct.
14 Q How many times did you get these more streamlined
15 types of reports from Mr. Van Der Wielen?
16 A This is the only one.
17 Q Did you ever produce any other of these more
18 streamlined reports yourself?
19 A No.
20 Q Did you ever produce any core constituency reports
21 from the autoBound software?
22 A Yes.
23 Q Did you produce any of those here today?
24 A No.
25 Q Did you retain any of those core constituency

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1 reports that you printed?
2 A No.
3 Q Do you recall approximately how many you would
4 have created?
5 A No.
6 Q All right. The next page, which is numbered 30,
7 is an E-mail from Mr. Van Der Wielen to you and
8 Mr. Ottman, correct?
9 A Uh-huh.
10 Q And what's the purpose of this E-mail from
11 Mr. Van Der Wielen?
12 A This ties back to the previous E-mail regarding
13 the disenfranchisement report, seeing if the -- it
14 appears that he's asking us if the format of the
15 plan -- the format of the new report is agreeable
16 to us.
17 Q So this also involves the same custom report that
18 is identified on Page 29?
19 A That's correct.
20 Q All right. The next page is Page 32.
21 A Uh-huh.
22 Q Does that also concern the same streamline report?
23 A Yes.
24 Q The next page, Page 34, another E-mail from
25 Mr. Van Der Wielen dated May 13th, correct?

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1 A Uh-huh.
2 Q What's the purpose of this E-mail from
3 Mr. Van Der Wielen?
4 A It seems to just be walking me through some
5 questions I had regarding autoBound.
6 Q And there's a reference to split geography. What
7 is that in reference to?
8 A Something about the split? I'm sorry. Could you
9 say your question again?
10 Q I'm just asking you the purpose of this E-mail
11 that Mr. Van Der Wielen sent to you.
12 A I don't exactly recall what we were discussing
13 here.
14 Q It references political subdivisions split between
15 districts. Do you see that?
16 A Yes.
17 Q And what is meant by political subdivisions split
18 between districts?
19 A A political subdivision being an MCD, a county.
20 Something along those lines. A split is obviously
21 when that political subdivision is not wholly
22 contained within one assembly or senate district.
23 Q When you refer to MCD, what are you referring to
24 there?
25 A I believe the acronym stands for minor civil

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1 division.
2 Q And what would constitute a minor city division?
3 A City of Madison.
4 Q Are you talking with municipalities generally?
5 A In regards to what? MCD?
6 Q Yes.
7 A Yes. Generally, yes.
8 Q Did this one have specifically to do with Madison?
9 A No.
10 Q Now, it says that there is a report. It's a PDF
11 file. Do you see that? That's what's referred to
12 in the attachments?
13 A Yes.
14 Q So that was a report that was produced by
15 Mr. Van Der Wielen?
16 A Yes.
17 Q Is that a document that you brought with you
18 today?
19 A I believe so.
20 Q Did you and Mr. Ottman -- strike the question.
21 Did you or Mr. Ottman ever produce your own report
22 identifying political subdivisions that are split
23 between districts?
24 A Yes.
25 Q How many of those did you produce?

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1 A I don't know.
2 Q Did you bring any of those with you today?
3 A No.
4 Q Do they still exist?
5 A No.
6 Q Did anyone ever tell you not to retain any of the
7 reports that you created?
8 A No.
9 Q Is there a reason that you didn't retain them?
10 A There's no reason to.
11 Q Meaning that reports had been changed or updated
12 or revised or why is there no reason to retain
13 them?
14 A We had the information from them. That was it.
15 Q And what did you do with the information that you
16 took from the reports generally speaking?
17 A Generally speaking?
18 Q Yes.
19 A I would say preparation of the memos for the
20 committee testimony.
21 Q At what point would you have discarded the reports
22 that you had printed?
23 A I don't recall.
24 Q The next page, which is 35, is an E-mail from
25 Mr. Van Der Wielen to you dated May 10th. Do you

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1 see that?
 2 A Yes, I do.
 3 Q There's a link in there?
 4 A Uh-huh.
 5 Q What is that link to?
 6 A I don't recall.
 7 Q Do you know whether that still is a live link?
 8 A I don't know.
 9 Q The subject just says Data, correct?
 10 A Yes.
 11 Q Is there a way from telling from the link what
 12 that data pertained to?
 13 A No.
 14 Q The next page, which is Page 44 --
 15 A Uh-huh.
 16 Q That's an E-mail with an attachment, is that
 17 correct, the next page?
 18 A Yes.
 19 Q And this is simply you're asking Mr. Van
 20 Der Wielen for technical support in using
 21 autoBound?
 22 A Mr. Squires in this case.
 23 Q You're asking Mr. Squires?
 24 A And Mr. Squires and Mr. Van Der Wielen is included
 25 in the reply from the initial E-mail between

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1 Tad Ottman and Ryan Squires.
 2 Q On the page that begins 46 -- and we're working
 3 backwards here chronologically in time it appears.
 4 This is an E-mail from Mr. Van Der Wielen to you
 5 and to Mr. Ottman on May 4th, correct?
 6 A Uh-huh.
 7 Q The subject is 2010 State Senate Election Data.
 8 Do you see that?
 9 A Yes, I do.
 10 Q What's the purpose of this E-mail from
 11 Mr. Van Der Wielen?
 12 A It appears as though there was an addition to the
 13 database, and this is the steps to prepare the
 14 database for the updated data from LTSE.
 15 Q It looks like Page 49 is a continuation of that
 16 same E-mail; is that correct? No. That's not
 17 correct, is it? Let's actually turn to the next
 18 page which is Page 48.
 19 A Uh-huh.
 20 Q That's an E-mail from Mr. Squires to you? I'm
 21 sorry. It's to Mr. Ottman and Mr. Van Der Wielen
 22 and a copy to you?
 23 A Correct.
 24 Q And that's dated April 14th?
 25 A Uh-huh.

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1 Q It identifies on there a subject matter that says
 2 All Election Data Spreadsheet 2000 to 2010. Do
 3 you see that?
 4 A Yes.
 5 Q And then it says there's an Excel spreadsheet
 6 that's attached?
 7 A Yes.
 8 Q Is that Excel spreadsheet among the materials
 9 you're producing today?
 10 A Yes.
 11 Q And the subject line indicates All Election Data
 12 Spreadsheet. What is contained within that
 13 spreadsheet generally speaking, what data?
 14 A Judging by the file name it appears to be a ward
 15 breakdown of all of the data that LTSE provides to
 16 us. The VTDS is indicative of ward level data.
 17 Q So would that have been all election results from
 18 2000 to 2010 by ward?
 19 A I believe so, yes.
 20 Q Is that material or information that you
 21 considered during the redistricting process?
 22 MR. McLEOD: I'm going to assert
 23 the privilege, the legislative privilege, for
 24 the reasons set forth in the privilege log
 25 that we have submitted in connection with the

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1 documents today. That goes to information
 2 concerning motives, objectives, plans,
 3 reports or procedures used by lawmakers to
 4 prepare the redistricting plans here. And
 5 that's based on the Committee for a Fair and
 6 Balanced Map which is the central decision
 7 for Judge Stadtmueller's decision concerning
 8 the motions to quash. The legislative
 9 privilege applies to considerations made. It
 10 does not apply to objective facts that may
 11 have been used which is ultimately the
 12 subject of what's being presented here in
 13 terms of the information contained in this
 14 exhibit.
 15 MR. POLAND: Is there instruction
 16 not to answer?
 17 MR. McLEOD: I would instruct
 18 Mr. Foltz not to answer as it relates to
 19 matters within the scope of legislative
 20 privilege.
 21 Q Are you going to follow counsel's instruction not
 22 to answer the question?
 23 A Yes.
 24 Q If you turn --
 25 MR. McLEOD: Can I have the last

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1 question that you asked read back so that I
 2 can hear it again, please.
 3 MR. POLAND: Yes.
 4 (The following was read by the reporter:
 5 "Is that material or information that you
 6 considered during the redistricting process?")
 7 MR. McLEOD: Let me make sure my
 8 objection is clear which is to the extent
 9 that election data generally formed the basis
 10 or objective facts used in the drawing of
 11 districts in the redistricting process, I
 12 don't think the legislative privilege
 13 applies. To the extent you're asking about
 14 what amounts to the manner in which it was
 15 used and for what purpose, it does fall
 16 within the scope of legislative privilege.
 17 To the extent that the question merely asked
 18 was this information used, I don't think the
 19 privilege would apply, and I wouldn't
 20 instruct the witness not to answer that
 21 specific question.
 22 Q So let me go back to the question and ask you.
 23 Was this information used during the redistricting
 24 process?
 25 A Yes.

1 Q What did you use it for?
 2 A It's the underlying data at the ward level.
 3 Q And what was it used for specifically in the
 4 redistricting process?
 5 A To draw the districts. Well, I should say more
 6 accurately -- given that this is ward level data,
 7 it reflects the given demographics and election
 8 results broken down at the ward level.
 9 Q And that was used during the redistricting process
 10 to draw the districts that resulted in Act 43?
 11 A It is part of the underlying data.
 12 Q Part of the underlying data that was used to draw
 13 Act 43, the assembly districts?
 14 A Yes.
 15 Q Did anybody in particular instruct you to use that
 16 data?
 17 A No.
 18 Q Why did you decide to use that data?
 19 A It was a standard included database from LTSB
 20 provided to all four caucuses.
 21 Q Why is the election data from 2000 to 2010 being
 22 used to draw the 2011 Wisconsin Act 43 legislative
 23 districts?
 24 MR. McLEOD: I am going to assert
 25 the objection as it relates to why would it

1 be used as legislative privilege; why it
 2 would be used to draw Act 43 or Act 44. I
 3 think that falls within the scope of the
 4 legislative privilege, and I would instruct
 5 the witness not to answer. If there's a more
 6 general question about why this information
 7 would be used in the redistricting process as
 8 sort of underlying data, objective facts
 9 used, I think that would fall outside of the
 10 scope of the privilege. I think there's a
 11 division here between what I think you asked
 12 and what I think is appropriate for him to
 13 answer.
 14 Q Let me ask you first generally. Why would this
 15 type of data be used?
 16 A I couldn't answer that.
 17 Q You mentioned that it was included as part of the
 18 package that the LTSB sent out?
 19 A Correct.
 20 Q Did you have a specific purpose in mind in using
 21 this data to draw the assembly districts in
 22 Act 43?
 23 MR. McLEOD: I'm going to assert
 24 the legislative privilege and instruct the
 25 witness not to answer.

1 Q And you're going to follow counsel's instruction?
 2 A Correct.
 3 Q Did you ever have any conversations with anyone
 4 about using the 2000 to 2010 election data in
 5 drawing Wisconsin Act 43?
 6 MR. McLEOD: I'm going to assert
 7 two privileges. One is the legislative
 8 privilege to the extent that it involves
 9 conversations with members of the legislature
 10 or legislative aides or it falls within the
 11 legislative privilege.
 12 To the extent that it calls for a
 13 response that involves communications with
 14 counsel, it would fall within the scope of
 15 attorney-client privilege.
 16 On those two grounds I would instruct
 17 the witness not to answer. If there are
 18 conversations outside of the scope of those
 19 two privileges, he's free to answer.
 20 Q Did you have any conversations with anyone other
 21 than counsel or legislators about the use of the
 22 2000 to 2010 election data in drawing 2011
 23 Wisconsin Act 43?
 24 A Yes.
 25 Q Who did you discuss that with?

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1 A Tony Van Der Wielen and Brian Squires.
 2 Q Anyone other than Mr. Van Der Wielen and
 3 Mr. Squires?
 4 A No.
 5 Q Did you discuss it at all with Mr. Gaddie?
 6 A The underlying data?
 7 Q Yes. Or using the underlying election result
 8 data.
 9 A Yes.
 10 Q What were the discussions that you had with
 11 Mr. Gaddie about that subject?
 12 A I don't recall. I don't recall the specific
 13 conversations.
 14 Q Do you recall generally what you discussed about
 15 the election results using that data with
 16 Mr. Gaddie?
 17 A With respect to this specific file or --
 18 Q Just generally with respect to the legislative
 19 redistricting process.
 20 A I'm sorry. State the question again.
 21 Q Sure. What did you and Mr. Gaddie discuss about
 22 using the 2000 to 2010 election data in creating
 23 the assembly districts that were included in
 24 Wisconsin Act 43?
 25 MR. McLEOD: I'm going to assert an

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1 objection to the form of the question. I
 2 think it mischaracterizes what he previously
 3 stated. It was vague and ambiguous.
 4 To the extent that you can answer the
 5 question, please do so.
 6 A Dr. Gaddie was made aware of the existence of this
 7 data.
 8 Q And did you discuss this data with Dr. Gaddie?
 9 A Yes.
 10 Q What did you and Dr. Gaddie discuss about this
 11 data?
 12 A That it is available.
 13 Q All right. Did you discuss at all how it would be
 14 used in preparing what became the assembly
 15 districts included in Wisconsin Act 43?
 16 A I don't recall.
 17 Q Did Dr. Gaddie suggest that you take this data
 18 into account in drawing the assembly districts?
 19 A I don't recall.
 20 Q Did you discuss this data with anyone other than
 21 the people we have already discussed?
 22 A Not that I can recall.
 23 Q If you turn then to Page 51.
 24 A Uh-huh.
 25 Q It looks like Pages 51 through 53 --

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1 A Right.
 2 Q -- also relate to the all election data
 3 spreadsheet, correct?
 4 A Uh-huh.
 5 Q There's another E-mail that appears on Pages 54
 6 through 56?
 7 A Uh-huh.
 8 Q That also relates to the all election data
 9 spreadsheet?
 10 A Correct.
 11 Q Right? And then if we turn to the next page,
 12 Pages 57 through 59.
 13 A Yes.
 14 Q That also relates to the all election data
 15 spreadsheet, correct?
 16 A Yes.
 17 Q And then on Pages 60 to 61 there's another E-mail
 18 from Mr. Squires to you and Mr. Ottman also
 19 relating to the all election data spreadsheet?
 20 A Uh-huh.
 21 Q And then the same thing on Page 62. That's
 22 another E-mail from Mr. Van Der Wielen relating to
 23 the all election data spreadsheet, correct?
 24 A Yes.
 25 Q In each of those E-mails that we have just talked

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1 about there is an indication that there are --
 2 strike that question. In the E-mails that are on
 3 Pages 60 and 62 --
 4 A Uh-huh.
 5 Q -- it indicates there is a zip file that's
 6 attached; is that correct?
 7 A Yes.
 8 Q Are those zip files that you're producing today?
 9 A If not the zip file the Excel spreadsheet
 10 contained within that zip folder.
 11 Q So those were Excel spreadsheets then that were
 12 within the zip files?
 13 A Correct. It's the same file we have been seeing
 14 time and time again going back through this. For
 15 some reason they decided to attach it as a zip
 16 file for the remainder of the time as we worked
 17 through some of the errors we were catching. As
 18 you see in the E-mail chain, the revisions were
 19 reflected in the updated spreadsheet going
 20 forward.
 21 Q The remaining documents that we have here on
 22 Page 63 through the end of this particular
 23 document -- the pages are not all numbered in any
 24 particular order --
 25 A Uh-huh.

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<p>1 Q -- it would appear. It looks like it goes from 2 Page 63 up to 76, and then there are a number of 3 pages that are numbered either 1, 2 or 3 in the 4 remainder of that document; is that correct? 5 A Yes. 6 Q And these are all E-mails between you and 7 Mr. Ottman and Mr. Van Der Wielen and Mr. Squires 8 it would appear? 9 A It would appear. There may be a Dana Wolff E-mail 10 that is in there potentially. Maybe not. They 11 appear to be between Ryan Squires, Tony 12 Van Der Wielen, Tad and I. 13 Q There is -- 14 A There is one Dana Wolff here, and that attachment 15 is included on the disk. 16 Q And there is an E-mail that is I think second -- 17 it appears it's the last E-mail. 18 A Uh-huh. 19 Q There's one additional name on there and that's -- 20 I'm go to ask you to pronounce the name. 21 A Joel Ylvisaker. 22 Q And he's with LTSB as well? 23 A Yes. 24 Q There is a reference to Fred in that E-mail. Who 25 is that that Mr. Squires is referring to?</p> <p style="text-align: center;">73</p>	<p>1 Dr. Gaddie the amendment for the Hispanic 2 districts, Assembly Districts 8 and 9, that was 3 adopted by the committee. 4 Q And Mr. Ottman's E-mail is on Sunday, July 17th, 5 correct? 6 A Yes. 7 Q And that is after the hearing, correct? 8 A Yes. 9 Q Do you know, was Mr. Ottman responding to a 10 request that Mr. Gaddie had? 11 A I don't know. 12 Q Do you know -- in his E-mail Mr. Ottman says to 13 Dr. Gaddie that Jim Troupis asked that Dr. Gaddie 14 look at the amendment that was adopted in 15 committee on the Hispanic districts. Do you see 16 that? 17 A I do. 18 Q Do you know why Mr. Troupis made that request? 19 A I do not. 20 Q Did you have a discussion at all with Mr. Troupis 21 about that? 22 A I don't recall. 23 Q Did you have a discussion with Mr. Ottman about 24 that? 25 A I don't recall.</p> <p style="text-align: center;">75</p>
<p>1 A He would be referring to Fred Hejazi. I believe 2 he works at or is potentially the CEO of City Gate 3 GIS which is the company that produces autoBound. 4 Q Again, a technical question? Does that appear 5 what you're asking about here? 6 A Yes. There's an air capture after that which 7 would be some snafu with the software. 8 Q I would like to look at the next document in the 9 stack or set of documents. It appears that there 10 are several printouts of E-mails from a Gmail 11 account? 12 A Yes. 13 Q And that is your own personal Gmail account? 14 A That is. 15 Q Did you use your Gmail account for communicating 16 with other people in the redistricting process? 17 A Sometimes. 18 Q And so this first E-mail that's printed out is 19 from Sunday, July 17th? 20 A Uh-huh. 21 Q It's from Dr. Gaddie to Mr. Ottman, and then a 22 number of people are CC'D on this E-mail, correct? 23 A Yes. 24 Q Now, what's the purpose of sending this E-mail? 25 A It appears that this is Tad Ottman showing</p> <p style="text-align: center;">74</p>	<p>1 Q Did you participate in any discussions with 2 Mr. Gaddie on the issue of the Wisconsin Hispanic 3 districts? 4 A Yes. 5 Q When did you have those discussions with 6 Mr. Gaddie? 7 A I don't recall. 8 Q Was it before the July 13th hearing? 9 A Yes. 10 Q Generally speaking what did you and Dr. Gaddie 11 discuss? 12 A The Hispanic districts. 13 Q Anything in particular about them? 14 A Basically how to draw them correctly. 15 Q Did you have those discussions before the 16 districts were actually drawn? 17 A I don't recall. 18 Q And when we're talking about the Hispanic 19 districts, we mean Districts 8 and 9, Assembly 20 Districts 8 and 9, correct? 21 A That's correct. 22 Q And those are in Milwaukee? 23 A Yes. 24 Q Now, you will see in Mr. Ottman's E-mail it says, 25 "Amendment Two is the configuration that was</p> <p style="text-align: center;">76</p>

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1 adopted. The HVAP in AD 8 65 percent and AD 9 is
 2 54 percent." Do you see that?
 3 A Yes.
 4 Q All right. And what is HVAP?
 5 A Hispanic voting age population.
 6 Q It says that's it's 60.5 percent in District 8,
 7 right, correct?
 8 A Yes.
 9 Q Do you know who made the decision to go with the
 10 60.5 number there?
 11 A That was the result of conversations between legal
 12 counsel and the Mexican American Legal Defense
 13 Education Fund or MALDEF.
 14 Q And what about the 54 percent number in AD 9? Was
 15 that also a decision made by legal counsel and
 16 MALDEF?
 17 A Yes.
 18 Q When you say legal counsel, are you referring to
 19 any attorney in particular?
 20 A No.
 21 Q Were you a participant in any conversations or
 22 communications between MALDEF and legal counsel
 23 having to do with the HVAP in either Assembly
 24 District 8 or 9?
 25 A No.

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1 Q Do you know whether Mr. Ottman participated in
 2 those?
 3 A I do not know.
 4 Q The next document is an E-mail. It looks like
 5 it's two pages or at least in my copy it's two
 6 pages stapled together.
 7 A Uh-huh.
 8 Q Again, E-mails from Sunday, July 17th. It looks
 9 like that first page is again the same E-mail that
 10 we just looked at from Mr. Ottman to Mr. Gaddie,
 11 correct?
 12 A It appears that way.
 13 Q And the page that's attached is an E-mail from
 14 Dr. Gaddie to Mr. Ottman, correct?
 15 A Yes.
 16 Q It just says, "I will look at them and can talk
 17 after 5:00 p.m.," correct?
 18 A Yes.
 19 Q Did you participate in any follow-up conversation
 20 with Dr. Gaddie?
 21 A No.
 22 Q The next document -- my copy is stapled together.
 23 I'm not sure if your copy is as well.
 24 A Yes.
 25 Q All right. What is this collection of pages here

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1 just generally?
 2 A Generally this is an E-mail chain forwarded to me
 3 by a legal counsel reflecting the conversations
 4 between MALDEF, the Mexico American Legal Defense
 5 Education Fund, and legal counsel regarding the
 6 configurations of Assembly Districts 8 and 9.
 7 Q And it was sent to you on Monday, July 11th,
 8 correct --
 9 A It appears that way.
 10 Q -- of 2011? And that was two days before the
 11 hearing, the July public hearing?
 12 A Yes.
 13 Q When you refer to legal counsel, that's
 14 Mr. Troupis, correct?
 15 A It appears so.
 16 Q Do you know why Mr. Troupis was sending this to
 17 you?
 18 MR. McLEOD: I'm going to assert
 19 the attorney-client privilege. To the extent
 20 that the answer requires disclosure of any
 21 communication between Mr. Troupis as counsel
 22 and Mr. Foltz I will instruct Mr. Foltz not
 23 to answer.
 24 Q Are you going to follow counsel's instruction not
 25 to answer the question?

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1 A Yes.
 2 MR. EARLE: Excuse me, Doug?
 3 MR. POLAND: Yes, Peter?
 4 MR. EARLE: During the next break
 5 could you have somebody fax me a copy of that
 6 exhibit?
 7 MR. POLAND: It's a number of
 8 pages. I can see if we can have it scanned
 9 to you, Peter.
 10 MR. EARLE: That would be helpful.
 11 Thank you.
 12 MR. SHRINER: Doug, you're marking
 13 this 27?
 14 MR. POLAND: No. This is actually
 15 all one exhibit. It is Exhibit 25.
 16 MR. SHRINER: I thought we had a
 17 26.
 18 MR. POLAND: We do have a 26.
 19 There are two different disks.
 20 Q Mr. Foltz, there is an E-mail from Elisa Alfonso
 21 to Mr. Troupis dated Monday, July 11th, and that
 22 is something that Mr. Troupis is forwarding to
 23 Mr. Ottman and to you, correct?
 24 A Yes.
 25 Q Did you ever speak with Elisa Alfonso?

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1 A No.
 2 Q There's a CC to Alonzo Rivas as well?
 3 A Yes.
 4 Q Did you ever speak with Alonzo Rivas?
 5 A No.
 6 Q Did you ever personally participate in any
 7 conversations with MALDEF?
 8 A No.
 9 Q Or I should say any representative of MALDEF.
 10 A No.
 11 Q If you turn to the fourth page into the stapled
 12 group of E-mails, you will see an E-mail from
 13 Jim Troupis to Elisa Alfonso and Alonzo Rivas
 14 dated July 11th at 6:41 p.m.?
 15 A Yes.
 16 Q Do you see Mr. Troupis says, "Lisa and Alonzo, I
 17 liked your proposal. We have taken it a bit
 18 further. Here is a comparison of MALDEF's
 19 proposal to a suggestion we think might work a bit
 20 better."
 21 A Uh-huh.
 22 Q "MALDEF's option is shown in color and our
 23 suggestion to do the same thing on the same
 24 template is shown in outline forms as an overlay."
 25 Do you see that?

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1 A Yes.
 2 Q Is that attached to this E-mail chain?
 3 A Yes, it is. The very last page is the overlay
 4 that Mr. Troupis is referring to.
 5 Q The very last page is?
 6 A Let me just double-check that. Shown in color and
 7 shown in outline form -- yes.
 8 Q And then there are HVAP numbers under two plans.
 9 Do you see that?
 10 A Yes.
 11 Q There are numbers listed for MALDEF?
 12 A Uh-huh.
 13 Q And then Mr. Troupis says, "Our alternative"?
 14 A Uh-huh.
 15 Q Do you know what he means by our alternative?
 16 A Our alternative is reflected in the outline of the
 17 map on the back of this packet.
 18 Q And when he says our, whose alternative is that?
 19 A Ours. The redistricting team, for lack of a
 20 better term.
 21 Q Do you know who came up with those numbers, the
 22 60.52 and 54.03 numbers?
 23 A Either Tad Ottman or I.
 24 Q How did you arrive at those numbers?
 25 A The software.

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1 Q And when you say the software, you mean autoBound?
 2 A AutoBound, yes.
 3 Q Is there a way to cause autoBound to generate that
 4 kind of number? In other words, a calculation to
 5 generate that kind of a number?
 6 A It's part of the software, yes.
 7 Q How would you go about -- strike that question.
 8 How does autoBound calculate that number?
 9 A Well, I don't know the nuts and bolts of it.
 10 Q But generally speaking how is it generated?
 11 A Using census data.
 12 Q Do you know whether autoBound when it's generating
 13 that takes citizenship into account?
 14 A No. It does not. It is not a census -- it is not
 15 a census category of data.
 16 Q So autoBound only uses census categories of data?
 17 A And the other -- for example, the election data
 18 that we were talking about was part of the
 19 autoBound data. That is outside of the scope of
 20 the census but included in the autoBound
 21 underlying database.
 22 Q So what all data was included within the autoBound
 23 database that you used in the redistricting
 24 process?
 25 A Say that again.

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1 Q What data was included in the autoBound database
 2 that you used to produce the assembly district
 3 maps as part of Act 43?
 4 A The PL 94 171 data provided to the U.S. Census
 5 Bureau and the redistricting data office and
 6 merged with the election data provided to us by
 7 LTSB and all four caucuses.
 8 Q Any other data that was part of the autoBound
 9 database that you used?
 10 A Not to my knowledge.
 11 Q Do you know, does autoBound have the capability to
 12 add data other than that?
 13 A I don't know.
 14 Q The autoBound database that you used to create
 15 Wisconsin Act 43, is that included within the
 16 materials that you have produced today?
 17 A Yes, it is.
 18 Q If you turn to -- the pages aren't numbered here,
 19 so I'm trying to count from the back end.
 20 A Uh-huh.
 21 Q If you turn to the 1, 2, 3, 4, 5, 6th page from
 22 the back end of the document, there's an E-mail
 23 from Mr. Troupis to Elisa Alfonso and Alonzo Rivas
 24 dated July 12th. It's on the bottom half of that
 25 page.

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1 A The 11:41 or --
 2 Q It is 10:35. It's just down below that one.
 3 A Yes. I see that.
 4 Q All right. Do you see that Mr. Troupis says, "I'm
 5 meeting with legislative leaders this afternoon."
 6 Do you see that?
 7 A Yes.
 8 Q Were you a part of the meeting between Mr. Troupis
 9 and the legislative leaders?
 10 A I don't recall.
 11 Q Do you recall meeting with Mr. Troupis and the
 12 legislative leaders with respect to the Hispanic
 13 districts in Milwaukee generally?
 14 A I don't recall.
 15 Q Mr. Troupis also states in that E-mail, "This
 16 morning I asked staff to consult with our
 17 Legislative Research Bureau on these alternatives
 18 as they must ultimately draft any amendment." Do
 19 you see that?
 20 A Yes.
 21 Q Do you recall consulting with the LRB on these
 22 alternatives?
 23 A Yes.
 24 Q All right. Who did you talk to at the LRB about
 25 these alternatives?

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1 A I don't recall. Probably Mike Keane, but I don't
 2 recall.
 3 Q What was your conversation with someone at the LRB
 4 whether it was Mike Keane or someone else?
 5 A Instructions on drafting the amendment that MALDEF
 6 had signed off on.
 7 Q What types of instructions did you need to receive
 8 from Mr. Keane.
 9 A What did he need to receive from me or Tad Ottman?
 10 Q I'm sorry. Yes. What did he need to receive from
 11 you?
 12 A The block assignment file that would be used to
 13 draft the Hispanic district configuration
 14 amendment that MALDEF agreed to.
 15 Q Did you ultimately transmit a block assignment
 16 file to the LRB?
 17 A I don't know if I did. Either Tad Ottman or I.
 18 Q One of the two of you would have done that?
 19 A Yes.
 20 Q Is that block assignment file that you sent to
 21 them part of the materials you're producing today?
 22 A I don't know off the top of my head.
 23 Q Were block assignment files maintained through the
 24 course of the redistricting process?
 25 A No.

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1 Q Why would they not be retained through the course
 2 of the redistricting process?
 3 A A block assignment file is not the proprietary
 4 format that autoBound uses to store information.
 5 It's a deliberate export of data that allows GIS
 6 software to be able to speak to each other across
 7 proprietary formats.
 8 Q All right. So you had to export data from
 9 autoBound into a block assignment file; is that
 10 correct?
 11 A Yes.
 12 Q Is that something that you did with any frequency?
 13 A No.
 14 Q Did you do it other than to send block assignment
 15 files to the LRB?
 16 A Not that I can recall.
 17 Q So the last two pages of this stapled group of
 18 documents -- there are two maps, correct?
 19 A Yes.
 20 Q And the second to the last page, what does that
 21 map portray?
 22 A I believe that is Assembly Districts 8 and 9 as
 23 reflected in Act 43.
 24 Q So as actually adopted by the legislature?
 25 A I believe so.

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1 Q And there are three triangles on there with names
 2 on them, correct?
 3 A Yes.
 4 Q There's one, Josh Zepnick, correct?
 5 A Yes.
 6 Q And then JoCasta Zamarripa?
 7 A Yes.
 8 Q And then Christine Sinicki, correct?
 9 A Yes. And also Mark Homadel and Jon Richards
 10 towards the top of the page.
 11 Q All right. What do those triangles denote?
 12 A The residence of incumbents.
 13 Q Why is it important to have the residence of
 14 incumbents reflected on the map?
 15 A It is part of the standard data set that was
 16 provided to us by LTSB.
 17 Q The next page is -- this is the last page of the
 18 stapled set. What does this map reflect?
 19 A This is the alternative that MALDEF proposed to us
 20 that was between the 57/57 HVAC configuration of
 21 ADs 8 and 9 and the 64/50 between 8 and 9. This
 22 was MALDEF's attempt to draw a 60/53 I believe it
 23 was on HVAP and the outline -- as Jim Troupis
 24 mentioned, the outline is our counterproposal that
 25 was a 60/54 configuration.

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1 Q Now, within 8 and 9 there is also -- the top half
2 of it is light blue, and the bottom half -- well,
3 the bottom portion is a darker green. Do you see
4 that?
5 A Yes, I do.
6 Q What did light blue and the darker portion of the
7 green represent?
8 A That was MALDEF's proposal to us.
9 Q And then the solid blue line that appears on that
10 last page --
11 A Uh-huh. Okay. I see it.
12 Q The solid blue line. What does that denote?
13 A The solid blue line would be the outline of AD 8
14 as reflected in Act 43.
15 Q And then the solid black line, is that AD 9 as
16 reflected in Act 43?
17 A Wholly contained, but you can also see the
18 boundaries of other districts sprawling out there.
19 Q Why was a decision made not to go with MALDEF's
20 proposal?
21 A It would have required redrawing of at least four
22 other assembly districts, so we proposed to them
23 our version of a 60/54 alternative that they
24 signed off on.
25 Q Was anyone other than MALDEF consulted on the

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1 eventual configuration of these two districts, 8
2 and 9?
3 A Not that I know of.
4 Q Did you personally speak with anyone about the
5 configuration of Districts 8 and 9?
6 A No.
7 Q You can set that document to the side. The last
8 document that was in the paper copies at least
9 that you provided to us today --
10 A Yes.
11 Q -- is an 11-by-17 it appears.
12 A Uh-huh.
13 Q It's a chart. What is this chart?
14 A This is something that I put together at the
15 instruction of Dr. Gaddie.
16 Q When did you put this together?
17 A I don't recall.
18 Q Was it before or after your testimony on
19 July 13th?
20 A Before.
21 Q What was the purpose of this?
22 A Relevant information that Dr. Gaddie needed.
23 Q Do you know what he needed it for?
24 A Well, the column headings reflect the different
25 categories of information reflected in the

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1 following information.
2 Q Did he tell you why he needed it?
3 A To perform some analysis.
4 Q Do you know the analysis that he was performing?
5 A I do not.
6 Q Did Dr. Gaddie make the request of you to compile
7 this chart?
8 A Yes.
9 Q So he spoke to you directly about it?
10 A Yes.
11 Q Was he at Michael Best & Friedrich's offices
12 working with you when he asked you to prepare this
13 chart?
14 A Yes.
15 Q Was anyone else present?
16 A I don't know.
17 Q Was he present in the office that you and
18 Mr. Ottman typically worked in?
19 A Yes.
20 Q How many times did Mr. Gaddie travel to Madison
21 and work in that office at Michael
22 Best & Friedrich with you?
23 A I don't recall.
24 Q Was anyone else present at times when you and
25 Mr. Gaddie were together in Michael Best's

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1 offices?
2 A Legal counsel and Joe Handrick.
3 Q What about Mr. Ottman? Was he ever present as
4 well?
5 A And Mr. Ottman. I apologize.
6 Q When you say legal counsel, that would be one of
7 the attorneys that you have mentioned before?
8 A Yes.
9 Q Was anyone else ever present when you Mr. Gaddie
10 were there working together?
11 A No.
12 Q You can set that document to the side. There were
13 also two disks that you brought with you today,
14 correct?
15 A Yes.
16 Q I'm going to hand you a copy of a disk that has an
17 exhibit sticker on it that says Exhibit No. 26.
18 A Okay.
19 Q Do you have that in front of you?
20 A Yes.
21 Q You see there's a label on that CD case?
22 A Yes.
23 Q What does the label say?
24 A Documents Responsive to 12/13/11 Subpoena.
25 Q Do you know what documents roughly are on that

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1 disk?
 2 A Various documents that are responsive to the
 3 subpoena.
 4 Q Are they all electronic files?
 5 A Yes.
 6 Q Not scanned documents I mean?
 7 A No.
 8 Q Generally speaking what kinds of electronic files
 9 are on there if you can answer the question?
 10 A Generally objective facts used to craft the map.
 11 Q Are there any data analysis files in there do you
 12 know?
 13 A No.
 14 Q Where were these electronic documents located?
 15 A On my computer and in E-mail attachments.
 16 Q Where is that computer located?
 17 A Michael Best.
 18 Q Is that a desktop computer or a laptop?
 19 A Desktop.
 20 Q So not one that you could take with you other
 21 places?
 22 A Correct.
 23 Q Was there any kind of a data repository created
 24 like an FTP site or anything that data was put in
 25 to that you used?

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1 A No.
 2 Q All of the data that you used for the
 3 redistricting process was on your computer?
 4 A Yes.
 5 Q Exhibit No. 27 then. I'm going to hand you a copy
 6 of that. Can you identify on the label what that
 7 says.
 8 A Statewide Data Base.
 9 Q And what is that?
 10 A This is underlying data provided by LTSB to all
 11 four caucuses that autoBound looks to for
 12 Wisconsin geography. It also contains the
 13 incumbent shaped file, those plots we were talking
 14 about earlier with the triangles and the dots.
 15 Those are contained in here as well. And the 2002
 16 plans for the assembly senate and court maps.
 17 Q Is the autoBound database that you referred to
 18 before on one of these two disks?
 19 A Yes.
 20 Q Is that in the disk that's Exhibit 26?
 21 A 27.
 22 Q It's in 27?
 23 A Yes.
 24 MR. POLAND: Why don't we take
 25 about a five-minute break.

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1 Peter, I will see if I can get a scanned
 2 copy of those documents to you.
 3 MR. EARLE: That would be great.
 4 (Recess)
 5 Q Mr. Foltz, we just came back from a lunch break.
 6 During the lunch break did you meet with anyone
 7 other than Mr. McLeod?
 8 A I ate lunch with Marie and Dan and Tom.
 9 Q And did you discuss anything about your testimony
 10 this morning?
 11 A Nope.
 12 Q This morning I asked you a number of questions
 13 about the documents that you brought with you
 14 today, correct?
 15 A Yes.
 16 Q All right. Have you seen a copy of discovery
 17 orders that were entered by the Court in this
 18 case?
 19 A Could I see them?
 20 Q Yes. Let's mark them as an exhibit.
 21 (Exhibit Nos. 28 and 29 marked for
 22 identification)
 23 Q Mr. Foltz, I've handed you two documents. The
 24 first has been marked as Exhibit No. 28. You see
 25 it's an order. Down at the bottom it's dated --

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1 there's a stamp and it says Filed 12/8/11. Do you
 2 see that?
 3 A Yes, I do.
 4 Q All right. Did you ever receive a copy of this
 5 order?
 6 A I believe so, yes.
 7 Q Who did you receive it from?
 8 A Eric McLeod.
 9 Q Did you ever have a discussion -- I'm just asking
 10 now whether you had a discussion. I'm not asking
 11 what was said. Did you ever have a discussion
 12 with Mr. McLeod about how this would affect the
 13 subpoena and your production of materials pursuant
 14 to it?
 15 A Yes.
 16 Q Exhibit No. 29.
 17 A Uh-huh.
 18 Q If you look at the bottom, you will see that it's
 19 dated December 20, 2011. That's yesterday?
 20 A Yes.
 21 Q Did you ever see a copy of this order?
 22 A Yes.
 23 Q And who gave you this order?
 24 A Joe Olson with Michael Best.
 25 Q And did you have a discussion with Mr. Olson or

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1 Mr. McLeod about how this order would affect your
2 production of materials in this case?
3 A Production of my materials? No.
4 Q What about the production of materials pursuant to
5 the subpoena served on you?
6 A No.
7 Q You didn't discuss how this order in Exhibit 29
8 would affect that?
9 A Not that I can recall.
10 Q Okay. You can set those to the side. Mr. Foltz,
11 where do you currently reside?
12 A Sun Prairie.
13 Q How long have you lived there?
14 A Year and a half.
15 Q Do you have a résumé or a curriculum vitae, a CV?
16 A No, I don't. Not an updated one I should say.
17 Q How old is the last one that you have?
18 A Pretty old at this point.
19 Q Does it predate the time that you started working
20 for the assembly?
21 A Does not predate the time working in the assembly.
22 Does predate my time working for Representative
23 Fitzgerald.
24 Q Rough date?
25 A 2007, 2008.

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1 A What do you mean?
2 Q In January 2009 how did you come to have that job?
3 A He hired me.
4 Q Before January of 2009 what did you do?
5 A I worked for Representative Brett Davis.
6 Q When were you hired to work with Brett Davis?
7 A Approximately November of '07.
8 Q And then that was up until January of 2009?
9 A Yes.
10 Q When you started with Representative Fitzgerald in
11 January of 2009, what were your tasks?
12 A Miscellaneous, jack of all trades type of work.
13 Policy, working with the caucus on things like
14 member outreach, technology issues where I could
15 be helpful. Things along that sort.
16 Q And were you tasked immediately to work on
17 legislative redistricting in January of 2009?
18 A No.
19 Q When did that come about?
20 A Later.
21 Q You might have testified to that earlier. I don't
22 have that date in front of me.
23 A I don't recall the exact date of when Jeff
24 assigned me that task.
25 Q Do you currently have an office over in the state

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1 Q All right. You graduated from the University of
2 Wisconsin-Whitewater, correct?
3 A That's correct.
4 Q And you have a bachelor of arts in finance?
5 A And economics.
6 Q And economics too? You graduated in 2005?
7 A Correct.
8 Q Did you ever attend law school?
9 A No.
10 Q Do you have a law degree?
11 A No.
12 Q Other than your undergraduate studies, have you
13 had any formal education beyond high school?
14 A No.
15 Q You have held your current position since what
16 year?
17 A My current position with Representative Fitzgerald
18 was January of 2011. No. Wait. What year is it
19 now? 2010.
20 Q So since January of 2010 --
21 A I'm sorry. Let me think. 2009. January of 2009
22 would have been my starting time with
23 Representative Fitzgerald.
24 Q How did you come to work with Representative
25 Fitzgerald?

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1 capitol?
2 A Yes.
3 Q Do you have your own office or do you share an
4 office with someone else?
5 A The speaker's office.
6 Q All right.
7 A There is a desk in the speaker's office.
8 Q And do you have a computer at that desk?
9 A Yes. There are workstations. There are
10 workstations at all of the desks.
11 Q That workstation is yours alone at your desk?
12 A No.
13 Q Other people work on it as well?
14 A Yes.
15 Q Do you have a cell phone that was issued by your
16 employer?
17 A No.
18 Q Do you have your own personal cell phone that you
19 use?
20 A Yes.
21 Q Is your current cell phone number (715) 360-2779?
22 A That's correct.
23 Q Do you use that cell phone for business as well?
24 A Yes.
25 Q Is it a BlackBerry or does it have E-mail

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1 capability?
 2 A Yes.
 3 Q Does it have texting capability?
 4 A Yes.
 5 Q What kinds of things did you do for Brett Davis
 6 when you worked for him between November 2007 and
 7 January 2009?
 8 A I worked on policy issues focusing largely on
 9 education policy. He was the education committee
 10 chair at the time although I did not clerk that
 11 committee. Also just various tasks that a
 12 legislative aide would provide. Constituent
 13 relations, constituent outreach. Then I left
 14 State service to run his assembly race in 2008.
 15 Q So you were working directly for Representative
 16 Davis in the reelection?
 17 A No. It's the Republican Party of Wisconsin and
 18 Republican Assembly Campaign Committee who
 19 assigned me to run Brett Davis's race.
 20 Q Got it. And how long did you do that for?
 21 A I believe I left State service in September and
 22 returned after the election. I believe it was
 23 September roughly.
 24 Q So about one year?
 25 A September through November.

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1 college?
 2 A No.
 3 Q What did you do before that?
 4 A Special election for Scott Newcomer for assembly,
 5 33rd assembly district.
 6 Q When were you hired by Scott Newcomer?
 7 A You're really testing my memory here. Whenever
 8 Dan Vrakas was elected to Waukesha County exec. I
 9 want to say it was September. Maybe October.
 10 Q Of 2005?
 11 A Yes. Yes.
 12 Q And you did that up until about January 2006?
 13 A Yes.
 14 Q What did you do before you worked for
 15 Mr. Newcomer?
 16 A Went to college.
 17 Q So that was your first job out of college then?
 18 A Yes.
 19 Q Did you have any part-time positions or
 20 internships or externships during college working
 21 with any political subdivision or any campaign?
 22 A No.
 23 Q So working for Mr. Newcomer was your first
 24 experience working in politics?
 25 A In a paid capacity.

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1 Q September through November. And then before you
 2 began working for Brett Davis in November 2007
 3 what did you do?
 4 A Worked for representative Karl Van Roy.
 5 Q How long did you do that?
 6 A From January of that year until I began working
 7 for Brett Davis.
 8 Q So from January of 2007 through November 2007?
 9 A Yes.
 10 Q What was your position with Karl Van Roy?
 11 A Legislative aide.
 12 Q Before you began working for Karl Van Roy in
 13 January of 2007 what did you do?
 14 A I worked for the Republican Party of Wisconsin.
 15 Q What was your position with the Republican Party
 16 of Wisconsin?
 17 A I worked for the Republican Assembly Campaign
 18 Committee.
 19 Q When were you hired by the Republican Party of
 20 Wisconsin?
 21 A January of '06 maybe. That's a rough estimate.
 22 Q So for about a year then, January of '06 to
 23 January of '07?
 24 A Approximately. Yes.
 25 Q Was that job in January 2006 your first job out of

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1 Q You had done volunteer work before?
 2 A Exactly.
 3 Q Nothing on redistricting, though, before you
 4 started working on the 2011 redistricting?
 5 A That's correct.
 6 Q All right. Mr. Foltz, did you meet with anyone to
 7 prepare for your deposition before you came today?
 8 A Spoke to legal counsel.
 9 Q And that would be Mr. McLeod?
 10 A Yes.
 11 Q Did you meet with anybody else?
 12 A Other members of the legal team.
 13 Q And when you say the legal team, what attorneys
 14 specifically?
 15 A Joe Olson.
 16 Q Anyone else?
 17 A No.
 18 Q Have you ever given a deposition before?
 19 A No.
 20 Q This is your first time?
 21 A Yes.
 22 Q Were you ever told that you would not have to be
 23 deposed in this lawsuit?
 24 A Not that I can recall.
 25 Q Do you understand you have been identified by the

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1 defendants in this lawsuit as a potential trial
2 witness?
3 MR. KELLY: Objection, form.
4 Q You can answer the question.
5 A I'm sorry. Say the question again.
6 Q Sure. Have you ever been told that you could be a
7 potential trial witness in this case?
8 A No.
9 Q Did you ever discuss with anyone whether you would
10 or would not be a witness at trial in this case?
11 A No.
12 Q I'm going to ask you if you can pull out -- you
13 have got a number of different stacks. I'm going
14 to ask if you could find Exhibit No. 10. Maybe I
15 can find it for you right here. I would ask you
16 to take a look at that. If you turn to the very
17 first page, and let's make that the second page,
18 you will see that it says Defendants Amended
19 Initial Rule 26(A) Disclosures. Do you see that?
20 A Yes.
21 Q This is a document that Mr. Hassett, who is not
22 here this afternoon -- he had asked you about it
23 this morning. Do you recall when Mr. Hassett
24 asked you about this document?
25 A I don't remember being asked about this document.

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1 Q Turn to Page 5 of the document if you would.
2 A Okay. There. Now I do remember being asked about
3 this document.
4 Q All right. Mr. Hassett had asked you a question
5 about Paragraph Number Ten. Do you see that
6 paragraph?
7 A Yes.
8 Q And you see that your name is identified there?
9 A Yes.
10 Q All right. I'm going to ask you whether you were
11 involved in reviewing the 2010 decennial census
12 and whether you assisted in determining
13 appropriate constitutional boundaries for the
14 state districts as memorialized into Act 43.
15 That's a correct statement?
16 A I would -- yes.
17 Q And if you turn the page then to Page 6, you see
18 there's a Paragraph Number 11?
19 A Uh-huh.
20 Q Is it a true statement that you reviewed census
21 and population data from the 2010 decennial census
22 to ensure minimal population deviation for the new
23 districts?
24 A Yes.
25 Q Paragraph Number 12.

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1 A Uh-huh.
2 Q Is it true that you were involved in reviewing
3 population and other data so as to preserve to the
4 extent possible and practicable the core
5 population of prior districts as well as
6 communities of interest?
7 A Yes.
8 Q Yes? Paragraph 13. Is it true that you assisted
9 the legislature in insuring that the new
10 redistricting maps to the extent possible kept
11 wards and municipalities whole within legislative
12 district boundaries and to the extent possible
13 recognized local government boundaries?
14 A Yes.
15 Q And Paragraph Number 14. Is it a true statement
16 that you assisted the legislature to insure that
17 if the voters were shifted from odd to even senate
18 districts they were not unnecessarily
19 disenfranchised by being deprived of the
20 opportunity to vote?
21 A Yes.
22 Q And then Paragraph 15. Did you in fact review the
23 2010 decennial census data and the previous
24 districting maps to insure that the new districts
25 were as geographically compact as possible?

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1 A Yes.
2 Q I'm sorry. Actually, I misstated that. The new
3 districts were geographically compact as
4 practicable.
5 A Yes.
6 Q If you turn the page to Paragraph 16. Did you in
7 fact assist the legislature to prevent unnecessary
8 and unconstitutional voter dilution of minority
9 voters?
10 A Yes.
11 Q And then Paragraph 17. Did you assist the
12 legislature to insure that the new districts
13 reflected communities of interest?
14 A Yes.
15 Q In carrying out these tasks you will see in each
16 of the paragraphs we just went over the names
17 Tad Ottman and Joe Handrick also are identified.
18 A Uh-huh.
19 Q In carrying out these tasks did you work both with
20 Mr. Ottman and Mr. Handrick?
21 A Yes.
22 Q Did you ever see a copy of this Amended Rule 26(A)
23 Disclosures that's in Exhibit No. 10 before today?
24 A No. Today was the first time.
25 Q Have you discussed with anyone giving testimony on

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1 any of those topics that we just went over?	1 Q Did you mark it up or anything?
2 A I've testified on those topics at the legislative	2 A Yes.
3 committee hearing.	3 Q Do you still have that copy of the complaint?
4 Q Have you discussed with anyone testifying at the	4 A No.
5 trial in this case on any of those topics?	5 Q Was it significant to you as a staffer to Speaker
6 A No.	6 Fitzgerald that that complaint was filed?
7 Q Have you seen a copy of the complaint in this	7 A Yes.
8 case?	8 Q Why was it significant?
9 A Yes.	9 A Because my job was redistricting and I'm tasked to
10 Q When did you first see a copy of the complaint in	10 be apprised of what is going on with it.
11 this case?	11 Q Did you do anything as a result of the complaint
12 A I don't recall. Well, before the map was even	12 being filed?
13 introduced. The initial complaint was before	13 A No.
14 anything even public was introduced. There was no	14 Q With respect to redistricting did you do anything
15 act, bill, draft.	15 as a result of the complaint being filed?
16 Q Let me just give you a copy of the complaint so we	16 A What do you mean?
17 don't have to guess.	17 Q Did it cause you to take any actions, the fact
18 MS. LAZAR: It's Exhibit 11.	18 that the complaint was filed?
19 Q That's right here. This is actually an amended	19 A I read it.
20 complaint. If you see on Exhibit 11 it says	20 Q Have you seen a copy of the answer that was filed
21 Second Amended Complaint for Declaratory and	21 to the complaint in this case?
22 Injunctive Relief?	22 A Yes.
23 A Uh-huh.	23 Q When did you first see a copy of the answer?
24 Q Have you seen a copy of this amended complaint?	24 A I don't know.
25 A Yes.	25 Q Do you know whether it was before or after it was
109	111
1 Q If you flip to the back page, you will see the	1 filed?
2 date is November 18, 2011.	2 A Before.
3 A Uh-huh.	3 Q So were you asked to comment on the answer before
4 Q Did you see the original complaint filed in this	4 it was filed?
5 case?	5 A Yes.
6 A Yes.	6 Q Who asked you to comment on a draft answer before
7 Q And that was filed back in June?	7 it was filed?
8 A I believe so.	8 A Legal counsel.
9 Q Who gave you a copy of the complaint?	9 Q Was that Mr. McLeod?
10 A I don't recall.	10 A Yes.
11 Q Do you know why you were given a copy of the	11 Q Anyone else?
12 complaint?	12 A That asked me to comment on it?
13 A No.	13 Q Correct.
14 Q Were you asked to do anything with respect to the	14 A No.
15 complaint?	15 Q Did you provide Mr. McLeod with comments on the
16 A No.	16 draft answer to the complaint?
17 Q Did anybody ever ask you to read through it and	17 A Yes.
18 give them your impressions of the complaint, the	18 Q Do you understand what discovery is in a lawsuit,
19 allegations and the claims that were made in it?	19 the setting of the lawsuit?
20 A Not that I can recall.	20 A In broad sense. Obviously I'm not an attorney.
21 Q Did you do anything with the complaint when it was	21 Q Have you heard the term interrogatory before?
22 given to you?	22 A Yes. I've heard of it.
23 A Read it.	23 Q This is Exhibit No. 12. Actually, let's do it
24 Q Did you keep a copy of it?	24 this way. This is Exhibit No. 13.
25 A No.	25 A Okay.
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1 Q I'll take that back from you.
 2 A All right.
 3 Q Do you see that Exhibit No. 12 is -- I'm sorry.
 4 Exhibit No. 13 says it's Plaintiffs' First Set of
 5 Interrogatories and First Request for Production
 6 of Documents. Do you see that?
 7 A Yes.
 8 Q If you turn to the very back page, you will see
 9 there's a date of November 22, 2011.
 10 A Okay.
 11 Q Have you ever seen this document before?
 12 A I have not.
 13 Q Did anybody ever ask you to -- actually, strike
 14 that question. If you turn to Page 3, you will
 15 see it begins there with an Interrogatory No. 1.
 16 A I'm sorry. Interrogatory No. 1?
 17 Q Page 3.
 18 A Okay.
 19 Q Bold face that says Interrogatory No. 1?
 20 A Yes.
 21 Q If you flip through the pages up through Page 5,
 22 you will see there are nine interrogatories that
 23 appear in there?
 24 A Uh-huh.
 25 Q Did anybody ever give you these interrogatories

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1 and ask you to provide information to respond to
 2 them?
 3 A No.
 4 Q And then beginning on Page 5 it says Request for
 5 Production of Documents?
 6 A Uh-huh.
 7 Q And then if you turn to Pages 6, 7 and 8, you will
 8 see there are a number of document requests that
 9 are there?
 10 A Uh-huh.
 11 Q A total of 13?
 12 A Uh-huh.
 13 Q Did anyone ask you to produce those documents in
 14 response to these particular requests?
 15 A No.
 16 Q Are you aware whether there was ever any document
 17 that responded to Exhibit No. 13?
 18 A No.
 19 Q Did anybody ever show you a draft of such a
 20 document?
 21 A No.
 22 Q You testified before that you couldn't recall when
 23 you first began working on the 2011 redistricting;
 24 is that correct?
 25 A Right.

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1 Q Can you give me a rough approximation?
 2 A Well, it was when I began working for
 3 Jeff Fitzgerald in 2009, but it wasn't right at
 4 January. It was sometime later in the year.
 5 Q Who was it who told you that you were going to
 6 work on redistricting?
 7 A Speaker Fitzgerald.
 8 Q Do you know how Speaker Fitzgerald made the
 9 determination he would ask you to do that?
 10 A No.
 11 Q Were you told at the outset of that what your
 12 involvement would be in the redistricting process?
 13 A Yes.
 14 Q What were you told?
 15 A That I would be drawing the map.
 16 Q Did Speaker Fitzgerald tell you why you would be
 17 drawing the map?
 18 A Because it's constitutionally required to draw a
 19 map every ten years.
 20 Q Did he tell you why in particular he was going to
 21 ask you to do that?
 22 A No.
 23 Q Do you know other than from what he told you why
 24 he asked you in particular to do that?
 25 A No.

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1 Q You didn't have any experience before then in the
 2 drawing of legislative district maps, correct?
 3 A That's correct.
 4 Q So you don't know how it was decided what role you
 5 were going to play in the redistricting?
 6 A That's correct.
 7 Q Above and beyond your salary that you draw serving
 8 on Speaker Fitzgerald's staff, do you receive any
 9 additional salary or any additional compensation
 10 for your work on redistricting?
 11 A No.
 12 Q All right. Now, we mentioned before you did
 13 testify at the July 13th joint public hearing,
 14 correct?
 15 A That is correct.
 16 Q If you would take a copy of that. It's Exhibit 19
 17 right in front of you there.
 18 A Uh-huh.
 19 Q Have you seen Exhibit 19 before?
 20 A Yes.
 21 Q And this is a transcript of that hearing, correct?
 22 A That is correct.
 23 Q Was the testimony that you gave at this hearing
 24 true and correct?
 25 A To the best of my knowledge, yes.

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1 Q Have you reviewed your testimony?
2 A Yes.
3 Q Have you submitted any corrections or revisions to
4 your testimony?
5 A No.
6 Q Is there a process for doing that?
7 A No.
8 Q And there is a videotape of this testimony as
9 well, correct?
10 A WisconsinEye was there. Yes.
11 Q And have you watched that videotape?
12 A No.
13 Q Sitting here now, is there anything that you know
14 of in this transcript of your testimony that you
15 would correct or change?
16 A No.
17 Q Did you consult with any of the other witnesses
18 before the hearing?
19 A No. Well, Tad Ottman.
20 Q Mr. Ottman did testify too, correct?
21 A Yes.
22 Q Did you consult with anyone other than the
23 witnesses who testified before the hearing?
24 A I'm sorry. Say that again.
25 Q Sure. Before the hearing started did you consult

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1 with anyone other than Mr. Ottman about your
2 testimony?
3 A Legal counsel.
4 Q Which legal counsel?
5 A I don't know off the top of my head.
6 Q Did you consult with Mr. Handrick before the
7 hearing?
8 A Not that I can recall.
9 Q What about Dr. Gaddie?
10 A No.
11 Q After the hearing did you speak with Mr. Ottman
12 about your testimony?
13 A Yes.
14 Q And did you speak with Mr. Ottman about his own
15 testimony after the hearing?
16 A Yes.
17 Q What did you and Mr. Ottman discuss about each
18 other's testimony after the hearing?
19 A Just how it went.
20 Q What did Mr. Ottman tell you about his testimony?
21 A I don't recall.
22 Q Do you recall what you told Mr. Ottman about your
23 testimony?
24 A I don't recall.
25 Q After the hearing did you have any discussions

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1 about your testimony with anyone other than
2 Mr. Ottman?
3 A Yes.
4 Q Who was that with?
5 A Legal counsel.
6 Q Which particular lawyers?
7 A Eric McLeod and possibly -- I would say Eric and
8 Ray Taffora and Jim Troupis.
9 Q Did you have discussions with anyone other than
10 Mr. Ottman and legal counsel about your testimony?
11 A Yes.
12 Q Who else did you speak with?
13 A Joe Handrick, Speaker Fitzgerald, members of
14 speaker staff.
15 Q Were they all together when you had this
16 conversation?
17 A I don't recall.
18 Q What was the nature of the conversations you had
19 with Mr. Handrick after the hearing?
20 A He just congratulated me and said *Good job*.
21 Q Where did that discussion occur?
22 A I don't recall.
23 Q Was it over in the state capitol building?
24 A I don't recall.
25 Q What about Speaker Fitzgerald? What was the

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1 nature of those conversations?
2 A Same. Good job.
3 Q And what about the staff?
4 A Same.
5 Q Were the staff and Speaker Fitzgerald together
6 when you had these conversations with them?
7 A I don't recall.
8 Q Did you continue to work out of the Michael
9 Best & Friedrich office after the date of this
10 hearing on July 13th?
11 A Sometimes.
12 Q Did you do any legislative redistricting work
13 outside of Michael Best's office after July 13th?
14 A No.
15 Q In your view is there a difference between
16 reapportionment and redistricting?
17 A Are you asking my understanding of the
18 definitions?
19 Q Correct.
20 A My understanding of the definition is the
21 difference between reapportionment and
22 redistricting is that reapportionment is the
23 formal use to enumerate the number of
24 congressional seats, house seats, given to each
25 state following the census. Redistricting is the

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1 process by which you redraw legislative districts
 2 to balance populations to account for the changes
 3 in the demographics resulting from the census.
 4 Q When you did work on the redistricting plan, in
 5 addition to Mr. Ottman who did you work with?
 6 A The people I listed before. Legal counsel,
 7 Dr. Gaddie, Joe Handrick.
 8 Q So the list that you gave me before?
 9 A Yes.
 10 Q Is there anybody in addition to those people that
 11 you listed before?
 12 A Not that I can think of.
 13 Q Outside of the work that you did and other than
 14 the people you have already identified, is there
 15 anyone with whom you have discussed the
 16 redistricting process?
 17 A No.
 18 Q I want to direct your attention specifically to
 19 Joe Handrick and the work that you did with
 20 Mr. Handrick on the redistricting plan.
 21 A Uh-huh.
 22 Q First of all, let me ask you. Do you have any
 23 relatives who live in Minocqua?
 24 A No.
 25 Q Did you know Mr. Handrick before the 2011

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1 Mr. Handrick?
 2 A No.
 3 Q Have you worked with Mr. Handrick outside of the
 4 redistricting process?
 5 A Yes.
 6 Q And what did you previously do working with
 7 Mr. Handrick?
 8 A He was involved in Representative Meyer's
 9 reelection campaign.
 10 Q Which year was that?
 11 A 2010. That I'm aware of I should say. I don't
 12 know if he was involved in prior cycles. That is
 13 the extent of my knowledge.
 14 Q And you worked with him on that reelection
 15 campaign?
 16 A I know of his involvement in that reelection
 17 campaign.
 18 Q Did you do any work with him in that reelection
 19 campaign?
 20 A Not that I can recall.
 21 Q Did you know Mr. Handrick before Representative
 22 Meyer's reelection campaign?
 23 A I believe -- yes.
 24 Q Does that help to refresh your memory at all as to
 25 when you met Mr. Handrick?

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1 redistricting process?
 2 A Yes.
 3 Q When did you meet Mr. Handrick?
 4 A I don't recall.
 5 Q How long have you known him?
 6 A I don't know.
 7 Q Did you meet him before you started working for
 8 Speaker Fitzgerald?
 9 A That's a good question. I don't know.
 10 Q How did you first meet Mr. Handrick?
 11 A I don't remember.
 12 Q Do you remember who it was through?
 13 A No.
 14 Q Did Mr. Handrick introduce you to Speaker
 15 Fitzgerald?
 16 A No.
 17 Q When did you first start working with
 18 Mr. Handrick?
 19 MR. McLEOD: I'm going to insert an
 20 objection as to form. I think it's vague and
 21 ambiguous.
 22 To the extent you can answer, please do
 23 so.
 24 A I don't know.
 25 Q You don't recall when you started working with

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1 A No. I just know it was before the 2010 election
 2 cycle.
 3 Q In terms of the redistricting work that you
 4 performed for 2011 redistricting, when did you
 5 begin doing that work with Mr. Handrick?
 6 A I don't recall.
 7 Q Do you recall whether it was before February of
 8 2011?
 9 A I don't recall exactly when it was.
 10 Q Did you meet with Mr. Handrick to perform any work
 11 on the redistricting plan?
 12 A Say that again.
 13 Q Sure. Did you and Mr. Handrick -- were you ever
 14 together at the same time in the same place
 15 working on the redistricting?
 16 A Yes.
 17 Q And was that at the Michael Best & Friedrich
 18 office you described earlier?
 19 A Yes.
 20 Q And that work, your work on the redistricting
 21 plan, occurred only at the Michael Best offices;
 22 is that correct?
 23 A Outside of committee testimony.
 24 Q Outside of committee testimony. That was the
 25 July 13th testimony?

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1 A Actually, let me clarify that. The committee
2 testimony and then there was a round of meetings
3 with individual members that took place in the
4 speaker's office.
5 Q When you say individual members, you mean members
6 of the assembly?
7 A Yes.
8 Q When did those meetings occur?
9 A I believe the latter part of June, early July.
10 Q Were those meetings with individual members or
11 were there groups of members that you met with?
12 A Individual members with Representative Vos in the
13 room.
14 Q And so at each of those meetings you were present?
15 A Yes.
16 Q And a member of the assembly was present?
17 A Correct.
18 Q And Representative Vos was present?
19 A Yes.
20 Q And Mr. Handrick was present?
21 A No. He was not.
22 Q Who else was present at those meetings?
23 A No one else.
24 Q So it was just those people?
25 A Yes.

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1 Q Were the members of both parties in attendance at
2 those meetings?
3 A No.
4 Q They were just with the republican members of the
5 assembly?
6 A Correct.
7 Q Did you meet with every republican member of the
8 assembly?
9 A Yes.
10 Q And what was the purpose of those meetings?
11 MR. McLEOD: First of all I'm going
12 to object to the form. I assume you're
13 referring to the meeting he just described
14 with members of the legislature in the
15 capitol.
16 MR. POLAND: That's correct.
17 MR. McLEOD: If the question is
18 what was the purpose of that meeting, those
19 meetings, I'm going to assert on the grounds
20 of legislative privilege for the reasons set
21 forth in our privilege log and specifically
22 the Committee for a Fair and Balanced Map
23 which articulates and defines the scope of
24 the legislative privilege as it would relate
25 to information concerning motives,

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1 objectives, plans, reports and/or procedures
2 used by lawmakers to prepare the
3 redistricting plan and would instruct the
4 witness not to answer pursuant to the
5 legislative privilege.
6 Q Are you going to follow counsel's instruction not
7 to answer the question?
8 A Yes.
9 Q Other than those meetings that you had, those
10 rounds of meetings with members of the assembly,
11 and then your testimony at the July 13th hearing,
12 was all of the work that you performed on
13 redistricting done at Michael Best & Friedrich's
14 offices?
15 A Yes.
16 Q Do you know why you only worked at Michael
17 Best & Friedrich's offices on redistricting?
18 A I can't say.
19 Q Did anyone ever tell you why all of that work
20 needed to be done at Michael Best & Friedrich's
21 offices?
22 A No.
23 Q When you were performing the work at Michael
24 Best & Friedrich's offices, did you save the work
25 that you performed in any way?

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1 A I'm sorry. Say that again.
2 Q Sure. Did you save the work that you performed
3 there in any way?
4 A Some, yes.
5 Q Did you save paper copies of things that were
6 printed out such as reports?
7 A Sometimes.
8 Q Did you save copies of electronic files that you
9 created?
10 A Sometimes.
11 Q Are those documents still in existence?
12 A Some.
13 Q And there are others that are not?
14 A That were produced during the redistricting
15 process that are no longer there?
16 Q Yes. Correct.
17 A Yes.
18 Q Were those documents moved anywhere that you know
19 of?
20 A No.
21 Q Were those documents destroyed in some way?
22 Thrown out? Discarded?
23 A Yes.
24 Q Did anyone ever tell you to preserve the materials
25 that you were creating during the redistricting

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1 process?
 2 A No.
 3 Q Did anyone ever tell you to discard the materials
 4 that you were creating?
 5 A No.
 6 Q You just decided not to keep them?
 7 A Uh-huh.
 8 Q Do you know whether there are files that were
 9 saved on a computer that are still in existence at
 10 the Michael Best offices?
 11 A Yes.
 12 Q Are you still doing any work out of that office?
 13 A Sometimes.
 14 Q What's the purpose of the work that you're doing
 15 over there now?
 16 A Redistricting.
 17 Q Is there anything to be left with the
 18 redistricting process?
 19 A Litigation.
 20 Q Is there anything other than litigation to be done
 21 with it?
 22 A Not to my knowledge.
 23 Q How often did you work with Mr. Handrick at the
 24 Michael Best offices?
 25 A That's hard to say.

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1 Q Was it a daily basis?
 2 A No.
 3 Q Weekly basis?
 4 A Sometimes. Some weeks, yes; some weeks, no.
 5 Q Did you communicate with Mr. Handrick about
 6 redistricting outside of Michael Best's offices?
 7 A No.
 8 Q Did you ever communicate with Mr. Handrick by
 9 E-mail about redistricting?
 10 A Yes.
 11 Q All right. Did you use the E-mail account from
 12 which the E-mails we went over this morning were
 13 printed?
 14 A Yes.
 15 Q Do you still have copies of the E-mails that you
 16 exchanged with Mr. Handrick regarding
 17 redistricting?
 18 A Some.
 19 Q Have you produced any of those today?
 20 A I don't know.
 21 Q Were there any that were withheld from production
 22 today?
 23 A Yes.
 24 Q Do you know, was that on the privilege grounds
 25 that has been asserted?

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1 A I would defer to legal counsel on that one.
 2 Q Was that a determination that you made?
 3 A No.
 4 Q Did you print copies of all of the E-mails and
 5 give them to legal counsel?
 6 A Yes.
 7 Q And legal counsel made a determination then about
 8 whether they were privileged or not?
 9 A Yes. Yes.
 10 Q Did you ever text message with Mr. Handrick?
 11 A I don't recall.
 12 Q And that's regarding redistricting.
 13 A I don't recall.
 14 Q Same answer? What about instant messaging? Do
 15 you ever instant message with Mr. Handrick
 16 regarding redistricting?
 17 A No.
 18 Q When you and Mr. Handrick were together at Michael
 19 Best's offices, what did you observe Mr. Handrick
 20 doing?
 21 A Drawing maps.
 22 Q What map specifically was Mr. Handrick drawing?
 23 A Act 43. Well, maps involved in the process of
 24 leading towards Act 43.
 25 Q Any specific maps that you can identify?

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1 A The assembly and senate plans. I should say
 2 versions of alternatives that eventually became
 3 Act 43.
 4 Q Was Mr. Handrick drawing those on a computer or
 5 was he drawing those by hand?
 6 A Computer.
 7 Q Was that also using the autoBound software?
 8 A Yes.
 9 Q Did he have his own computer over at Michael Best?
 10 A Yes.
 11 Q So that was not the same as the computer that you
 12 used?
 13 A Correct.
 14 Q Do you know, is Mr. Handrick still working out of
 15 the Michael Best office?
 16 A No.
 17 Q When was the last time that you saw him at the
 18 Michael Best office?
 19 A I don't recall.
 20 Q Do you know whether it was after Act 43 was
 21 passed?
 22 A I don't recall. It was after. Yes.
 23 Q But you don't recall how recently it was?
 24 A Yeah. Right.
 25 Q Was anyone ever in the room with you and

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1 Mr. Handrick while he was drawing various
2 alternatives for the maps that eventually became
3 Act 43?
4 A Legal counsel.
5 Q That would be Mr. McLeod or one of the other
6 lawyers you have mentioned before?
7 A Yes.
8 Q Was Mr. Ottman ever in the room?
9 A Yes.
10 Q Did you and Mr. Handrick ever look at maps that he
11 was drawing together?
12 A Yes.
13 Q And did you provide any commentary to him on the
14 maps that he was drawing?
15 A I'm sure I did.
16 Q What about maps -- strike that question. Were
17 there times when you were drawing maps in
18 autoBound that Mr. Handrick commented on them?
19 A In autoBound?
20 Q Correct.
21 A Not that I can recall.
22 Q What about paper maps? Were there paper maps that
23 you were drawing that Mr. Handrick commented on?
24 A Yes.
25 Q Were those also maps, various versions of what

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1 eventually became Act 43?
2 A Yes.
3 Q Were there any specific aspects of the
4 redistricting plan that Mr. Handrick was focusing
5 on?
6 A The fundamental criteria. The splits, deviation,
7 core retention and disenfranchisement which is a
8 function of core retention and things like that.
9 Q Did Mr. Handrick give you any guidance on any of
10 those criteria?
11 A Yes.
12 Q Generally what kind of guidance did he give on
13 those criteria?
14 A I can't recall.
15 Q Did you ever look at any versions of the maps with
16 Mr. Handrick where he specifically advised you on
17 splits?
18 A I'm sure he did, yes.
19 Q And what about population deviation? Did he ever
20 give you specific guidance on population
21 deviation?
22 A I'm sure at some point, yes.
23 Q What about core retention? Did he ever give you
24 specific advice on core retention?
25 A Not that I can recall.

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1 Q And then disenfranchisement?
2 A It's a function of core retention. I don't
3 recall.
4 Q You just don't recall whether Mr. Handrick had
5 given you any specific advice on drawing maps with
6 respect to core retention or disenfranchisement?
7 A Right.
8 Q Do you know whether the alternatives that
9 Mr. Handrick drew in autoBound were retained in
10 any way?
11 A I don't know.
12 Q You don't know if they would still be in existence
13 on the computer at Michael Best's offices?
14 A He had electronic files that were produced.
15 Q And when you say the electronic files that were
16 produced, do you mean produced today --
17 A No.
18 Q -- in the disks?
19 A No.
20 Q Okay. Produced in what way?
21 A My understanding is yesterday.
22 Q Okay. You also worked with Mr. Ottman on the
23 redistricting plan, correct?
24 A Yes.
25 Q Did you and Mr. Ottman divide up the work in some

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1 way that you performed?
2 A Not so much with a map. I would say that the
3 drafting was more Tad's responsibility than mine.
4 Q And when you say drafting, you mean drafting of
5 the maps themselves?
6 A The correspondence with LRB and things like that
7 to turn the block assignment file into a
8 legislative draft.
9 Q Did Mr. Ottman take the lead in any particular
10 areas of the drafting process?
11 A No.
12 Q So, for example, with respect to any specific
13 districts or areas of the state, did Mr. Ottman
14 take a lead role?
15 A No.
16 Q What about on the congressional districts? Did
17 Mr. Ottman have any involvement with those?
18 A Not that I know of.
19 Q Do you know who was involved in drawing the
20 congressional districts?
21 A No.
22 Q Was there any work done in the Michael Best office
23 at the time that you were present where there was
24 work done on the congressional districts?
25 A No.

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<p>1 Q Do you know whether Mr. Ottman began working on</p> <p>2 redistricting before you did?</p> <p>3 A I don't know.</p> <p>4 Q Was one of you working in the Michael Best offices</p> <p>5 first? Before the other in other words?</p> <p>6 A I don't remember.</p> <p>7 Q Do you know whether you started working there</p> <p>8 roughly around the same time?</p> <p>9 A I don't remember.</p> <p>10 Q What was Mr. Ottman's role generally speaking in</p> <p>11 the redistricting process?</p> <p>12 A Drawing the map.</p> <p>13 Q When you say drawing the map, this is using</p> <p>14 autoBound software, correct?</p> <p>15 A Yes.</p> <p>16 Q I want to ask you just about you personally and</p> <p>17 what you did in terms of drawing the map, but I</p> <p>18 want to talk specifically about using the</p> <p>19 computer. When you use autoBound, are you</p> <p>20 actually using a mouse to draw a map?</p> <p>21 A Yes.</p> <p>22 Q Are you doing it by position a cursor on a screen</p> <p>23 and drawing lines or how does that process work?</p> <p>24 A Assigning -- I think the more accurate way to put</p> <p>25 it would be assigning existing census geography.</p> <p style="text-align: center;">137</p>	<p>1 A LTSB.</p> <p>2 Q And that was the autoBound Version 9 you were</p> <p>3 talking about?</p> <p>4 A Correct.</p> <p>5 Q So you did some training on the software before</p> <p>6 the census data was released?</p> <p>7 A Uh-huh.</p> <p>8 Q And then after the census data was released, is</p> <p>9 that the point at which the process of drawing the</p> <p>10 maps began?</p> <p>11 A Say that again.</p> <p>12 (Question read)</p> <p>13 A Yes. I would say that's safe to say. I think</p> <p>14 there was a lag between when we actually received</p> <p>15 the PL data from the census bureau, the</p> <p>16 redistricting data office of the census bureau,</p> <p>17 and when it is put into a form autoBound can use.</p> <p>18 So there was a delay in there between when LTSB</p> <p>19 received it and when they were able to put it in</p> <p>20 proper form.</p> <p>21 Q So it's LTSB that puts it in the format that</p> <p>22 autoBound could use and manipulate?</p> <p>23 A Yes.</p> <p>24 Q All right. It was some time after you received</p> <p>25 that data from LTSB that you then began drawing</p> <p style="text-align: center;">139</p>
<p>1 I can't just freeform a line, but you can select a</p> <p>2 census block, a ward, a county, a CCD or an MCD</p> <p>3 and assign that to District X.</p> <p>4 Q And is that done in a graphical way? You have got</p> <p>5 a map up on the screen and you click on something</p> <p>6 and you make an assignment?</p> <p>7 A That's correct.</p> <p>8 Q In this case it was census blocks that were being</p> <p>9 used, correct?</p> <p>10 A Yes.</p> <p>11 Q As opposed to wards?</p> <p>12 A Yes.</p> <p>13 Q Do you know census blocks were being used instead</p> <p>14 of wards?</p> <p>15 A The wards didn't exist at that point. The new</p> <p>16 wards did not exist at that point.</p> <p>17 Q When was the first time that you started drawing a</p> <p>18 map for the purpose of the 2011 redistricting?</p> <p>19 A I don't recall.</p> <p>20 Q Do you recall whether it was -- it must have been</p> <p>21 after the census data was released, correct?</p> <p>22 A Well, we had the software available to us before</p> <p>23 then. It was largely a training exercise to get</p> <p>24 familiar with the software and its functions.</p> <p>25 Q And who provided the software?</p> <p style="text-align: center;">138</p>	<p>1 the maps?</p> <p>2 A Yes.</p> <p>3 Q Is there a reason that you didn't wait until after</p> <p>4 the ward process had been completed in the state</p> <p>5 to draw the maps?</p> <p>6 A No.</p> <p>7 Q Do you recall in the testimony that was given at</p> <p>8 the hearing there was a reference to this</p> <p>9 litigation having been filed --</p> <p>10 A Uh-huh.</p> <p>11 Q -- and the need to draw the maps before the</p> <p>12 litigation proceeded?</p> <p>13 A I'm sorry. Say that again.</p> <p>14 (The two previous questions were read)</p> <p>15 A I don't remember that specific reference or that</p> <p>16 specific line of testimony.</p> <p>17 Q All right. Do you know any reason other than the</p> <p>18 fact that the wards had not yet been created that</p> <p>19 census blocks were used to draw the maps?</p> <p>20 A It was what's available to us.</p> <p>21 Q Using census blocks as opposed to wards created</p> <p>22 difficulties for municipalities; is that correct?</p> <p>23 MR. McLEOD: I'm going to assert an</p> <p>24 objection to the form of the question.</p> <p>25 To extent you can answer, please do so.</p> <p style="text-align: center;">140</p>

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1 A I don't agree with that.
 2 Q Why do you not agree with that?
 3 A The change in the process did not force them to
 4 redraw aldermanic or supervisory districts. The
 5 legislation allowed for them to maintain those
 6 boundaries.
 7 Q Did anybody ever tell you otherwise or express an
 8 opinion otherwise?
 9 A To me directly?
 10 Q Correct.
 11 A No.
 12 Q Did you ever hear about anybody expressing the
 13 opinion otherwise?
 14 A Yes.
 15 Q All right. When was that that you heard that?
 16 A At the hearing.
 17 Q All right. Any time other than the hearing that
 18 anyone -- that you heard about that?
 19 A No.
 20 Q So when you were engaged in the process of drawing
 21 the maps at the Michael Best office, you would --
 22 using the mouse you would click on a census block
 23 and you would assign it to a particular district;
 24 is that correct?
 25 A Any level of census geography. So it could be

1 block at the smallest, multiple counties at the
 2 largest.
 3 Q And in the maps that you created did you use
 4 different levels of geographic areas? Did you use
 5 census blocks? Did you use counties? Did you
 6 use larger areas?
 7 A Uh-huh.
 8 Q Who else other than you and Mr. Ottman and
 9 Mr. Handrick engaged in that process at the
 10 Michael Best offices?
 11 A No one.
 12 Q So just the three of you?
 13 A Correct.
 14 Q Was there ever a time when you were at the Michael
 15 Best office where anyone instructed you how to
 16 create certain districts using the mouse and the
 17 autoBound software?
 18 A Not that I can recall.
 19 Q Did anyone ever tell you as you were engaged in
 20 the process of selecting census blocks and
 21 assigning them that you should put a particular
 22 census block in a certain district?
 23 A I don't remember.
 24 Q Was there ever a time that Dr. Gaddie was present
 25 there where you were creating maps, clicking on

1 census blocks, and he was advising you about that
 2 process?
 3 A I don't remember.
 4 Q What about Mr. Handrick? Was there ever a time
 5 that you were assigning certain census blocks and
 6 Mr. Handrick was advising you whether to assign
 7 them to a certain district or a different
 8 district?
 9 A I don't remember.
 10 Q I want to split up a couple of different
 11 categories of people here. First I'm going to
 12 talk about legislators; Speaker Fitzgerald,
 13 Senator Fitzgerald, Robin Vis and Senator
 14 Zipperer.
 15 A Uh-huh.
 16 Q They were present at various times at the Michael
 17 Best offices during the redistricting process?
 18 A Yes.
 19 Q Did any of them ever advise you where to draw any
 20 of the district boundaries?
 21 A I'm sure they did.
 22 Q Do you recall any of those conversations and what
 23 they said?
 24 A No.
 25 Q Do you recall whether any of the -- strike that.

1 Do you recall which districts they would have been
 2 discussing with you in the redistricting process?
 3 A I don't recall.
 4 Q Do you recall discussing any boundaries with any
 5 of the legislators in, for example, Milwaukee
 6 County?
 7 A Say that again.
 8 Q Let me strike that question. Let me rephrase it.
 9 Did you discuss with any of the legislators any of
 10 assembly district boundaries in Milwaukee County?
 11 A In Milwaukee County? Yes.
 12 Q What was the nature of that conversation?
 13 A I don't remember.
 14 Q Did you talk at all with any of the legislators
 15 about the Latino districts in Milwaukee County?
 16 A Yes.
 17 Q What was the nature of those conversations?
 18 A Explaining to them the amendments and the
 19 alternative that we introduced and the
 20 conversations with MALDEF.
 21 Q Who made the decision ultimately about where the
 22 boundaries of Assembly Districts 8 and 9 would be
 23 in Milwaukee County?
 24 A The legislature.
 25 Q And that was when they adopted Act 43 as amended?

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1 A Uh-huh.	1 Q Was it a handful of times?
2 Q With respect to the map that was submitted to the	2 A I don't know.
3 legislature for its consideration, who was it who	3 Q No estimate at all?
4 made the final decision about where the district	4 A No.
5 boundaries for Assembly Districts 8 and 9 would	5 Q What about Senator Fitzgerald? How many times was
6 be?	6 he present over at Michael Best's offices when you
7 MR. McLEOD: I'm going to assert	7 were there?
8 the legislative privilege on the same grounds	8 A I don't know.
9 that I stated previously and as set forth in	9 Q Can you give me a ballpark? Was it more than 15?
10 our privilege log that we have provided	10 20?
11 earlier today. So to the extent that the	11 A I don't know.
12 question calls for information concerning the	12 Q What about Robin Vos? How many times was
13 identities of persons who participated in	13 Robin Vos present at Michael Best's offices?
14 those types of specific decisions, then I	14 A I don't know.
15 think it's subject to the legislative	15 Q Again, can you give me any kind of a ballpark?
16 privilege as set forth in the Committee for	16 Was it just a handful? Was it more than a dozen?
17 the Fair and Balanced map.	17 A I don't know.
18 Q Are you going to follow counsel's instruction --	18 Q And then what about Senator Zipperer? How many
19 A Yes.	19 times was Senator Zipperer present at Michael
20 Q -- and not answer the question?	20 Best's office during the redistricting process?
21 A Yes.	21 A I don't know.
22 Q We just have to be careful not to talk over each	22 Q Again, ballpark? Can you say a few? 15? 20?
23 other here.	23 A I don't know.
24 A Yes.	24 Q Did you ever communicate with any of those four
25 Q Sometimes my questions are painfully long, but you	25 legislators by E-mail about the redistricting
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1 have to wait until I finish them.	1 process?
2 What about with respect to the assembly	2 A Not that I can recall.
3 districts in Kenosha and Racine Counties? Did you	3 Q Did you ever communicate with any of those four
4 have any conversations with the legislators, and	4 legislators by text message or instant messaging
5 that would be Speaker Fitzgerald, Senator	5 about the legislative process?
6 Fitzgerald, Robin Vos or Senator Zipperer, about	6 A Not that I can recall.
7 then Kenosha and Racine assembly districts?	7 Q I'm sorry. And I said the legislative process. I
8 A Yes.	8 meant the redistricting process.
9 Q What was the nature of those conversations?	9 A Not that I can recall.
10 A I don't recall.	10 MR. SHRINER: He knew what you
11 Q Do you know who made the final decision on the	11 meant.
12 assembly district boundaries in Racine and Kenosha	12 Q Now I want to take a different group of people,
13 Counties that ultimately were reflected in Act 43?	13 and that's the legal counsel. That's Mr. McLeod,
14 MR. McLEOD: I'm going to assert	14 Mr. Taffora, Jim Troupis and Sarah Troupis.
15 the same legislative privilege objection.	15 A Uh-huh.
16 I'm not going restate it at length other than	16 Q Were there any other legal counsel who were
17 to note my prior objection and instruct the	17 involved in providing advice regarding
18 witness not to answer accordingly.	18 redistricting?
19 Q And you're going to follow counsel's instruction	19 A I mentioned Michael Screnock earlier.
20 not to answer the question?	20 Q That's right. You said he is an attorney at
21 A Yes, I am.	21 Michael Best & Friedrich?
22 Q How many times was Speaker Fitzgerald present over	22 A Right. Joe Olson has come up in conversation
23 at Michael Best's offices that you saw during the	23 today.
24 redistricting process?	24 Q Did Mr. Olson's involvement -- that postdated the
25 A I don't know.	25 passage of Act 43?
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1 A Correct.
 2 Q So Mr. Olson was not involved in the redistricting
 3 process itself before the time that the act was
 4 passed, is that correct, to your knowledge?
 5 A To my knowledge, yes.
 6 Q At least you had no involvement with him before
 7 that time?
 8 A Yes.
 9 Q So in terms of the legal counsel that you
 10 mentioned and you identified before --
 11 A Uh-huh.
 12 Q They were present at various times in the office
 13 at Michael Best & Friedrich where you were
 14 working?
 15 A They work there too.
 16 Q But in terms of that specific office that you were
 17 in when you were over there where you and
 18 Mr. Ottman had computers and worked, they were
 19 present in that office from time to time?
 20 A Yes.
 21 Q And generally speaking did they provide you with
 22 any advice on the redistricting process itself?
 23 A Yes.
 24 Q Generally speaking what kind of advice did they
 25 provide to you on that redistricting process?

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1 MR. McLEOD: I'm going to assert
 2 the attorney-client privilege. I think the
 3 substance of any communications regarding
 4 advice provided to the client is squarely
 5 within the scope of that privilege, and I
 6 would instruct the witness not to answer.
 7 Q And you're going to follow counsel's instruction
 8 and not answer the question?
 9 A Yes.
 10 Q Did you ever communicate with any of the legal
 11 counsel by E-mail regarding the redistricting
 12 process?
 13 A Yes.
 14 Q And we saw some examples of some of those E-mails
 15 this morning, correct?
 16 A Yes.
 17 Q We saw some E-mails. Mr. Troupis was involved in
 18 some of those, correct?
 19 A Yes.
 20 Q All right. There were additional E-mails that you
 21 have with legal counsel that you have not produced
 22 today, correct?
 23 A That's correct.
 24 Q Were those E-mails that you printed out and gave
 25 to Mr. McLeod or to legal counsel to look at?

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1 A Yes.
 2 Q What about text messaging? Did you ever text
 3 message with any of the legal counsel regarding
 4 redistricting?
 5 A Not that I can recall.
 6 Q What about instant messaging? Did you ever
 7 instant message with any legal counsel?
 8 A No.
 9 Q So either E-mail communications or face-to-face
 10 communications with legal counsel?
 11 A Or phone.
 12 Q Or phone conversations. Did you have a phone in
 13 the Michael Best & Friedrich office that you were
 14 working out of?
 15 A Yes.
 16 Q And did you use that for the purpose of
 17 redistricting?
 18 A Yes.
 19 Q What about cell phone? Did you have
 20 communications with anyone on your cell phone
 21 about the redistricting process?
 22 A Yes.
 23 Q You also mentioned that you had conversations with
 24 Scott Suder about redistricting; is that correct?
 25 A Yes.

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1 Q And who is Mr. Suder?
 2 A The majority leader.
 3 Q What were your conversations with Mr. Suder?
 4 A Regarding redistricting.
 5 Q Regarding redistricting. You are just saying
 6 regarding redistricting?
 7 A Yes.
 8 Q What was the specific nature of the conversations
 9 you had with Mr. Suder about redistricting?
 10 MR. McLEOD: I'm going to have to
 11 assert the legislative privilege on the same
 12 grounds that I had stated at length
 13 previously and instruct the witness not to
 14 answer as to those specific conversations
 15 that are within the scope of the legislative
 16 privilege.
 17 Q And you're going to follow counsel's instruction
 18 not to answer that question?
 19 A Yes.
 20 Q Were there ever any times that you had any
 21 conversations with Mr. Suder where anyone else was
 22 present?
 23 A Yes.
 24 Q And regarding redistricting?
 25 A Yes.

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1 Q All right. Who else was present during those
2 conversations?
3 A Legal counsel, Representative Vos, Representative
4 Fitzgerald, Senator Zipperer, Senator Fitzgerald,
5 Joe Handrick.
6 Q And what was said at those meetings where those
7 people were present regarding redistricting?
8 A I don't remember.
9 Q Do you know generally the nature of the subject
10 matter of those conversations?
11 MR. McLEOD: I'm going to object to
12 the form because if the question specifically
13 involves meetings in which Joe Handrick was
14 present, then it's different than if we're
15 talking about other meetings in which he
16 wasn't present. I think there's sort of
17 this -- I would have a general form objection
18 because you're talking about meetings
19 generally. Maybe a different cast of
20 characters and different individuals may
21 implicate different responses and also
22 different objections.
23 If you understand my point --
24 MR. POLAND: Yes.
25 Q Any meetings where you were discussing with

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1 Scott Suder the redistricting process where
2 Mr. Handrick was also present.
3 A I'm sorry. Say the question again.
4 Q Were there any meetings that you had or -- strike
5 that. Were there any conversations that you had
6 with Mr. Suder regarding the redistricting process
7 where Mr. Handrick was also present?
8 A Yes.
9 Q And what did you discuss at those meetings?
10 A Redistricting.
11 Q Anything specific about redistricting?
12 A I don't recall.
13 Q When did those meetings occur?
14 A I don't recall.
15 Q Were those over at Michael Best & Friedrich's
16 offices?
17 A Yes.
18 Q Was there more than one such meeting?
19 A Yes.
20 Q Do you know approximately how many meetings there
21 were?
22 A No.
23 Q Were maps being drawn at any of those meetings?
24 A No.
25 Q Was there any kind of work being done on a

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1 computer at any of those meetings?
2 A No.
3 Q Were you looking at any paper copies of maps at
4 those meetings?
5 A Yes.
6 Q Do you recall what the maps were that you were
7 looking at?
8 A I'm sorry?
9 Q Do you recall what the maps were that you were
10 looking at?
11 A Redistricting maps.
12 Q And those would have been for the purpose of
13 Act 43, correct?
14 A Yes.
15 Q Do you recall whether there was any specific
16 aspect of those maps that you were discussing?
17 A I don't recall.
18 Q Did you ever discuss redistricting with any
19 democratic member of the legislature?
20 A No.
21 Q Did you have any particular goal in developing the
22 maps that became Act 43?
23 MR. McLEOD: I'm going to assert an
24 objection as to form as it relates to my
25 prior comment before in terms of are we

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1 talking about specific meetings with
2 legislators? Are we talking about specific
3 meetings with Joe Handrick present? Because
4 my objection is different depending on what
5 you're asking. So form of the question
6 subject to that objection.
7 Q All right. This is going to be a standalone
8 question not referring specifically to any
9 meetings. Was there a goal that you had in
10 developing the map that became Act 43?
11 A Yes.
12 Q And what was that goal?
13 A To draw something that would pass the state
14 assembly and state senate and be signed by the
15 governor and survive a court challenge.
16 Q Was it a part of the goal to increase the
17 republican membership in the legislature?
18 A No.
19 Q Have you ever discussed with anyone the question
20 of district boundaries for senate --
21 MR. EARLE: I didn't hear the
22 answer to that.
23 MR. POLAND: We can have the court
24 reporter read it back.
25 (Answer read)

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1	MR. EARLE: Is there any way to get	1	Q So you saw it sometime after it was a final
2	the mike closer?	2	document?
3	MR. POLAND: Let us know if the	3	A Correct.
4	sound fades out again and we need to speak	4	Q Did you speak with Dr. Gaddie about his report
5	up.	5	before he submitted it?
6	MR. EARLE: Thank you.	6	A No.
7	Q Let me repeat the last question. Have you ever	7	Q Did you see a draft of it before it was submitted?
8	discussed with anyone the question of district	8	A No, I did not.
9	boundaries for senate recall elections?	9	Q Did Dr. Gaddie ask you to provide any information
10	A Not that I can recall.	10	that was going to be used to prepare this report?
11	Q Were you involved in drafting the provision that	11	A No, he did not.
12	established the effective date for Act 43?	12	Q Did you engage in any kind of E-mail
13	A Not that I can recall.	13	communications or other electronic communications
14	Q Do you know who was involved in that?	14	with Dr. Gaddie about his report?
15	A Not that I can recall.	15	A No.
16	Q Do you have any opinion on the appropriate	16	Q Have you been asked to look at Dr. Gaddie's report
17	boundaries for the pending or potential recall	17	since he produced it and make any comments about
18	elections?	18	it?
19	A My opinion is irrelevant.	19	A No.
20	Q Okay. You can answer the question.	20	Q When did you first meet Dr. Gaddie?
21	A What was the question? What my opinion is of --	21	A I don't recall.
22	Q The appropriate boundaries for the pending or	22	Q Were you involved in retaining Dr. Gaddie at all
23	potential recall elections.	23	to work as an expert witness in this case?
24	A That's a matter that's going to be decided by a	24	A No.
25	Court and not by me.	25	Q Have you spoken with him about his work in the
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1	Q So you do have an opinion but you don't want to	1	litigation?
2	state it?	2	A I don't believe so.
3	A Yes.	3	Q How many times did you meet with Dr. Gaddie in the
4	Q You understand that there are expert witnesses who	4	course of the redistricting process itself?
5	have been identified by the defendants in this	5	A I don't recall.
6	case?	6	Q Did you work with Dr. Gaddie at all before the
7	A Yes.	7	2011 redistricting process?
8	Q Have you seen any of their expert reports?	8	A No.
9	A Yes.	9	Q You can set the document to the side.
10	(Exhibit No. 30 marked for	10	(Exhibit No. 31 marked for
11	identification)	11	identification)
12	Q Mr. Foltz, I've handed you a copy of a document	12	Q Mr. Foltz, I have handed you a document that the
13	that the court reporter has marked as Exhibit	13	court reporter has marked -- I'm handing you a
14	No. 30. Do you have that in front of you?	14	document the court reporter has marked as
15	A Yes, I do.	15	Exhibit 31.
16	Q Do you see it says it's the expert report of	16	A Uh-huh.
17	Ronald Keith Gaddie, Ph.D.?	17	Q Do you have that in front of you?
18	A Yes, I do.	18	A I do.
19	Q Have you ever seen a copy of this document before?	19	Q Do you see that it's dated December 14, 2011?
20	A Yes, I have.	20	A Yes.
21	Q When have you seen this document before?	21	Q Do you see it's to Daniel Kelly, Reinhart
22	A I'm not sure exactly when.	22	Attorneys at Law?
23	Q Did you see this document before December 13,	23	A Uh-huh.
24	2011?	24	Q From John Diez/Magellan Strategies BR?
25	A No, I did not.	25	A Uh-huh.
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<p>1 Q I'm going to represent to you that is a copy of an 2 expert report submitted by Mr. Diez in the 3 redistricting litigation. Is that a document that 4 you have seen before? 5 A No. 6 Q Have you ever spoken with John Diez? 7 A No. 8 Q Have you ever spoken with anyone at Magellan 9 Strategies? 10 A No. 11 Q Were you ever asked to provide any data or other 12 information that was to be used by John Diez or 13 Magellan Strategies to your knowledge? 14 A No. 15 Q To your knowledge was Mr. Diez involved at all in 16 the redistricting process that resulted in the 17 passage of Act 43? 18 A No. 19 Q You can set that document to the side. 20 (Exhibit No. 32 marked for 21 identification) 22 Q Mr. Foltz, I've handed you a copy of a document 23 the court reporter has marked as Exhibit 32. Do 24 you have that in front of you? 25 A Yes, I do.</p>	<p>1 A I believe he's a demographer. 2 Q Did you work with any demographers at all in the 3 redistricting process? 4 A No. 5 Q Was there ever any discussion of working with any 6 demographers in the redistricting process? 7 A Not that I recall. 8 Q Were you asked to provide any information or any 9 data that was given to Dr. Morrison for the 10 purpose of his report as far as you know? 11 A No. 12 Q Were you ever asked to compile any demographic 13 information and provide it to counsel? 14 A Not that I can recall. 15 Q Have you been asked -- after you looked at 16 Dr. Morrison's report, have you been asked by 17 anyone to provide any comments on it? 18 A No. 19 Q Do you still have copies of Dr. Morrison's expert 20 report and Dr. Gaddie's report? 21 A I don't know. 22 Q You can set that aside. I'm going to ask you 23 questions about two exhibits that we marked 24 yesterday, Exhibits 14 and 15. Do you have those 25 in front of you?</p>
<p>1 Q It's titled Declaration and Expert Report of 2 Peter Morrison, Ph.D. 3 A Uh-huh. 4 Q And it's dated December 14, 2011. 5 A Uh-huh. 6 Q Have you ever seen a copy this document before? 7 A Yes. 8 Q When did you see a copy of this document? 9 A I don't remember exactly when. 10 Q Did you see any drafts of this document before it 11 was final? 12 A No, I did not. 13 Q So you have seen it at some time between 14 December 14th and today? 15 A Yes. 16 Q And that was the first time? 17 A Yes. 18 Q Have you ever meet Peter Morrison? 19 A No, I have not. 20 Q Have you ever spoken with Peter Morrison? 21 A No. 22 Q Corresponded with him in any fashion, E-mail, text 23 messaging or anything? 24 A No. 25 Q Do you know what Dr. Morrison's discipline is?</p>	<p>1 A I do. 2 Q I would like to draw your attention first on 3 Exhibit 14 to Statute Section 801.50(4m). Do you 4 see that? 5 A 50(4m). Oh, there we go. Yes. 6 Q Were you involved in any way in the development of 7 this statute? 8 A Yes. 9 Q What was your involvement in the development of 10 801.50(4m)? 11 A Conversations with legal counsel, legislative 12 leaders. 13 Q And which legal counsel was that? 14 A Michael Best. 15 Q Anyone in particular at Michael Best? 16 A I don't recall. 17 Q Do you know when those conversations occurred? 18 A I don't recall. 19 Q Do you know when that statute was passed? 20 A Roughly the same time line as Act 43 I believe. 21 Q Did those discussions occur over at Michael 22 Best & Friedrich's office? 23 A Yes. 24 Q Do you know who was present for those discussions? 25 A I don't recall.</p>

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1 Q Was Mr. Handrick involved at all in the drafting
2 of that statute?
3 A No.
4 Q Was he involved in any of your conversations with
5 Michael Best & Friedrich?
6 A No.
7 Q And who were the legislators that were involved in
8 those discussions?
9 A I don't remember.
10 Q Do you know what the goal of that statutory
11 provision was?
12 A I think the statute speaks for itself.
13 Q Were there any other goals that were discussed
14 other than what's on the face of the statute?
15 A No.
16 Q I would like you to take a look then at Exhibit
17 No. 15 and specifically at Section 751.035.
18 A I'm sorry. Say the section again.
19 Q Sure. 751.035.
20 A Okay.
21 Q Same question. Were you involved in any way with
22 the development of this statute?
23 A Yes.
24 Q Was that at the same time you were involved in the
25 development of 801.50(4m)?

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1 regarding the redistricting that are currently in
2 front of the Wisconsin Supreme Court?
3 A I'm aware of them, yes.
4 Q Have you seen a copy of the original petition that
5 was filed in Wisconsin Supreme Court?
6 A I don't remember.
7 Q I would like you to take a look at Exhibit No. 16.
8 Exhibit No. 16 is titled Petition for Appointment
9 of Three Judge Panel and it goes on from there.
10 Do you see that?
11 A Uh-huh.
12 Q If you flip through the document, the very last
13 page -- you will see it's dated November 21st?
14 A Okay.
15 Q All right. Now, this is a copy that does not have
16 the exhibits attached to the back. There are a
17 thick number of exhibits. I just wanted to ask
18 you about the document itself.
19 A Uh-huh.
20 Q Have you seen a copy of this petition before?
21 A I don't remember if I have or not.
22 Q Have you discussed the supreme court action with
23 anyone?
24 A Yes.
25 Q Who have you discussed it with?

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1 A I believe both provisions were included in the
2 same bill, so yes.
3 Q Again, you had discussions about that with legal
4 counsel at Michael Best & Friedrich?
5 A Uh-huh.
6 Q And also with legislators as well?
7 A Uh-huh.
8 MR. KELLY: Mr. Poland, so that the
9 record gets taken down correctly, when you're
10 referring to the 801 statute, it's actually
11 801.50(4m).
12 MR. POLAND: Correct.
13 MR. KELLY: 801.50(4m).
14 MR. POLAND: That's correct.
15 Q So these two statutes that we have discussed that
16 are reflected in Exhibits 14 and 15 were drafted
17 at the same time, correct?
18 A They were part of the same bill, yes. To the best
19 of my knowledge they were.
20 Q And was the goal of Section 751.035 the same as
21 the goal for Section 801.50(4m)?
22 A I think the statutes speak for themselves.
23 Q Mr. Foltz, are you aware of any pending lawsuits
24 regarding the redistricting litigation -- strike
25 that. Are you aware of any pending lawsuits

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1 A Representative Fitzgerald.
2 Q And what have you and Representative Fitzgerald
3 discussed about this lawsuit?
4 A Just that it exists.
5 Q Have you discussed at all any of the statements or
6 the allegations that are raised in this particular
7 petition?
8 A Not that I can remember, no.
9 Q Are you aware that there is also litigation
10 pending in the Waukesha County Circuit Court?
11 A Yes.
12 Q All right. And have you seen a copy of the
13 complaint filed in that action?
14 A I don't remember.
15 Q If you look at -- there are two exhibits actually
16 here, 17 and 18. I'll hand them both to you.
17 A Okay.
18 Q You will notice that one of them, Exhibit 17, is a
19 complaint and then Exhibit No. 18 is an amended
20 complaint.
21 A Okay.
22 Q And, again, I don't have the exhibits attached to
23 Exhibit 17. Exhibit 18 is a full copy of what was
24 filed. Have you ever seen copies of those
25 complaints before?

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1 A I don't remember if I have seen these before or
2 not.
3 Q Have you discussed with anyone the Waukesha County
4 lawsuits?
5 A Yes.
6 Q Who did you discuss those with?
7 A Representative Fitzgerald.
8 Q What was the nature of those conversations?
9 A Made him aware that they existed.
10 Q Did he discuss them at all with you?
11 A He was part of that conversation that I had with
12 him, yes.
13 Q Once you made him aware that these existed, what
14 was the conversation that you had about the
15 lawsuits?
16 A I don't recall.
17 Q Were you aware of any of these complaints before
18 they were filed?
19 A No.
20 Q Were you involved in drafting any of the legal
21 documents that were filed in these complaints?
22 A No.
23 Q I would like you to take out again the transcript
24 of the testimony from last summer. That's
25 Exhibit 19.

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1 Q That this was not actually a reapportionment? It
2 was a redistricting?
3 A Yes.
4 Q Are there any other core principles that are part
5 of redistricting?
6 A Yes.
7 Q What are those?
8 A Preservation of political subdivisions.
9 Q Anything else?
10 A No.
11 Q Mr. Ottman's testimony refers to equal population
12 there. Do you see that?
13 A Yes.
14 Q And what is the standard for equal population?
15 A The standard?
16 Q Yes. Is there a standard for equal population?
17 MR. McLEOD: Object to the form of
18 the question.
19 To the extent you can answer, please do
20 so.
21 A I'm not a lawyer. I really can't comment on
22 standards. I can comment on what the map's
23 deviation is and I can comment on where it stacks
24 up versus the core plan ten years ago.
25 Q Was there a standard that you were attempting to

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1 A Okay.
2 Q Were you present for Mr. Ottman's testimony on
3 July 13th as well?
4 A We testified at the same time.
5 Q So you were both -- you can see that on the video;
6 that you're both there at the same time, correct?
7 A Uh-huh.
8 Q I would like to draw your attention to testimony
9 on Page 4 at Lines 9 through 12. Specifically
10 Mr. Ottman testifies there are three core
11 principles to any reapportionment plan.
12 A Uh-huh.
13 Q Equal population, sensitivity to minority concerns
14 and compact and contiguous districts. Do you see
15 that?
16 A Yes, I do.
17 Q Do you agree with that statement?
18 A Yes. Although I don't necessarily agree with
19 reapportionment versus redistricting.
20 Q So you would substitute the word redistricting for
21 reapportionment?
22 A Yes.
23 Q Is that because of the distinction that you made
24 earlier between redistricting and reapportionment?
25 A Based on my understanding of the definitions.

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1 follow for equal pop to achieve equal population
2 in Act 43?
3 A Act 43's overall range is .78 I believe.
4 Q Was there a specific standard or target that you
5 were aiming for?
6 A Not that I can recall.
7 Q How did you decide that the actual population
8 deviation that was achieved was an appropriate
9 one?
10 A Looked at previous court decisions on the maps.
11 Q And which court decisions were those?
12 A 2002.
13 Q So you were trying to follow the population
14 deviation that was acceptable to the Court in
15 2002?
16 A We were roughly half of where the Court was in
17 '02.
18 Q Why were you only going for roughly half of what
19 the Court --
20 A I'm not saying we were going for half. That was
21 what the map turned out to be. I believe it was a
22 .78 overall range, as we call it, versus the court
23 map ten years ago which I believe was 1.58. But I
24 could be wrong on that.
25 Q So zero deviation, in other words a zero percent

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1 population deviation, is not an absolute
 2 requirement for redistricting, correct?
 3 A That is my understanding. Not for legislative
 4 redistricting versus congressional.
 5 Q Correct. And that's a fair distinction. I am
 6 referring specifically to legislative
 7 redistricting. You were not involved in the
 8 congressional redistricting, correct?
 9 A Correct. In the drawing of the map but the
 10 facilitation of the drafting.
 11 Q As you testified to earlier today?
 12 A Correct.
 13 Q Mr. Foltz, what are the appropriate conditions for
 14 taking race into account when drawing legislative
 15 district boundaries?
 16 MR. McLEOD: I would assert an
 17 objection as to the form of the question.
 18 If you can answer it, please do so.
 19 A Could you state the question again?
 20 MR. POLAND: Could you read it
 21 back.
 22 (Question read)
 23 A What do you mean by appropriate?
 24 Q Are there any conditions under which race can be
 25 taken into account when drawing legislative

1 assembly district boundaries?
 2 A I don't recall.
 3 Q Would you look at Page 27 of the transcript,
 4 please.
 5 A Uh-huh.
 6 Q I should actually -- let me ask you one question.
 7 If you turn to Page 26, just the preceding page,
 8 you will see there's a reference there on Line 5
 9 to Mr. Holtz. That's, I think, a reference that
 10 appears throughout. That should be Foltz,
 11 correct?
 12 A That is correct. I have not changed my name in
 13 the interim period.
 14 Q If you look at Page 27, I would like to draw your
 15 attention to Lines 2 through 5. This is
 16 Mr. Ottman testifying?
 17 A Uh-huh.
 18 Q His statement is, "So over the course of the next
 19 decade you could see that senate district, that
 20 that senate district, grow in Hispanic voting age
 21 population to the point where it may tip over to a
 22 majority minority district." Do you see that?
 23 A Yes.
 24 Q Do you know who made the assessment that the
 25 Hispanic voting age population could grow to the

1 district boundaries?
 2 A Yes.
 3 Q Under what conditions can that be done?
 4 A I don't understand the question.
 5 Q When can that be done? When can race be taken
 6 into account in drawing legislative district
 7 boundaries?
 8 A When there is a dense enough population of a given
 9 minority.
 10 Q Is there any specific legislation that covers
 11 that?
 12 A Not to my knowledge. I guess I'm not following
 13 the question.
 14 Q Did you have any involvement in taking race into
 15 account in drawing any of the assembly district
 16 boundaries that are reflected in Act 43?
 17 A Race was part of the census data.
 18 Q So was race considered outside of the bounds of
 19 the census data?
 20 A What do you mean?
 21 Q In drawing the assembly district boundaries.
 22 A No. What was part of the census data is what we
 23 had access to.
 24 Q So there was no data beyond that relating to race
 25 that was taken into account in drawing the

1 point where it may tip over to a majority minority
 2 district?
 3 A I do not.
 4 Q Did you have any discussions about that with
 5 Mr. Ottman?
 6 A I don't recall.
 7 Q Did you have any discussions with anyone else
 8 about that?
 9 A I don't recall.
 10 Q I would like you to look at Page 28, please, of
 11 the transcript.
 12 A Uh-huh.
 13 MR. SHRINER: Doug, if you were
 14 going to take a break -- we have been at it
 15 for about an hour and a half since lunch. I
 16 could use about ten minutes.
 17 MR. POLAND: That's fine. We can
 18 take a break. This is an appropriate place
 19 to take a break.
 20 (Recess)
 21 Q Mr. Foltz, just before we broke we were taking a
 22 look at the transcript of the July 13th hearing.
 23 Do you still have that transcript in front of you?
 24 A Yes. Page 28.
 25 Q Yes. Page 28. I would like to draw your

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1 attention to Lines 13 through 15. Do you see
 2 there's a reference there that Mr. Ottman is
 3 making that says, "Pairings are sometimes an
 4 inevitable consequence, and that is why you see
 5 those pairings here." Do you see that testimony?
 6 A Yes.
 7 Q And there he's referring to incumbent pairings
 8 that came about as a result of Act 43, correct?
 9 A Yes.
 10 Q Do you agree that pairings are sometimes an
 11 inevitable consequence of redistricting?
 12 A I would agree with that.
 13 Q Do you know how many incumbent pairings there were
 14 in Act 43?
 15 A There's a memo attached to the committee testimony
 16 that we had produced that accurately reflects the
 17 pairings.
 18 Q Do you know whether there were 11 pairings at
 19 least in assembly districts? Does that sound
 20 familiar?
 21 A It sounds familiar. I don't know off the top of
 22 my head.
 23 Q Did you have any involvement in determining which
 24 incumbents were paired in legislative districts?
 25 A I drew the map.

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1 Q Was the pairings a concern that you took into
 2 account when you were drawing the map?
 3 A Yes. It's definitely something we know of.
 4 Q Okay. Did you speak with any of the incumbents
 5 who were paired in the process of developing the
 6 map?
 7 A Yes.
 8 Q Which incumbents did you speak with?
 9 A All of them.
 10 Q All of them that were paired?
 11 A All of -- yes.
 12 Q All of the republicans that were paired?
 13 A All of the republicans that were paired, yes.
 14 Q And that's all republicans who were paired against
 15 any other incumbent whether they were a democrat
 16 or a republican?
 17 A Correct.
 18 Q Did you speak with any of the democratic
 19 incumbents who were paired?
 20 A No.
 21 Q So you did speak with republicans who were paired
 22 against other republicans as a result of Act 43?
 23 A Yes.
 24 Q I would like to draw your attention to the
 25 testimony at the bottom of Page 28 that is

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1 attributed to you. Again, with a correction that
 2 it's Foltz not Holtz.
 3 A Uh-huh.
 4 Q There you're talking about the districts --
 5 Assembly Districts 8 and 9 and the Hispanic
 6 community, correct?
 7 A Yes.
 8 Q Which members of the Hispanic community did you
 9 talk with about those legislative districts,
 10 Assembly Districts 8 and 9?
 11 A As I testified earlier, I did not speak to any
 12 member of the Hispanic community directly.
 13 Q Did anyone who was part of the redistricting
 14 effort speak with members of the Hispanic
 15 community?
 16 A Yes.
 17 Q We had the communications from Mr. Troupis before,
 18 correct?
 19 A Yes.
 20 Q And those are reflected in -- it was the documents
 21 that you had produced earlier today.
 22 A Yes.
 23 Q And that's Exhibit 24?
 24 MS. LAZAR: Exhibit 25.
 25 Q Correct. Exhibit 25.

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1 MR. POLAND: Thank you, Maria.
 2 A Uh-huh.
 3 Q So those are the E-mails that we saw previously
 4 including E-mails from Mr. Troupis, correct?
 5 A Yes.
 6 Q All right. And his communications were with
 7 MALDEF, correct, or representatives of MALDEF?
 8 A Yes.
 9 Q And specifically Mr. Troupis, from the E-mails at
 10 least it appears, was communicating with
 11 Elisa Alfonso and Alonzo Rivas?
 12 A Yes.
 13 Q Did you ever have any direct discussions or
 14 communications with Elisa Alfonso or Alonzo Rivas?
 15 A No.
 16 Q Did you ever have any communications with
 17 Manny Perez?
 18 A No.
 19 Q Did you ever have any communications with
 20 Zeus Rodriguez?
 21 A No.
 22 Q Do you know whether Mr. Troupis or anyone else on
 23 the legal team had any communications with
 24 Manny Perez or Zeus Rodriguez about redistricting?
 25 A I don't remember right now.

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<p>1 Q What about Mr. Ottman? Do you know if Mr. Ottman 2 spoke with Manny Perez or Zeus Rodriguez about 3 redistricting? 4 A I don't remember. 5 Q Have you ever seen any communications involving 6 Manny Perez or Zeus Rodriguez in connection with 7 the redistricting process? 8 A The written testimony. 9 Q And that was part of Exhibit 25 that we looked at? 10 A That's correct. 11 Q But other than that written testimony, you have 12 not seen any communications from or involving 13 Manny Perez or Zeus Rodriguez with respect to 14 redistricting? 15 A That's correct. 16 Q I would like you to take a look at Page 29 of the 17 transcript, Lines 22 to 23. This is Mr. Ottman's 18 testimony. 19 A Could you give page and line again? 20 Q Sure. Page 29. 21 A Lines? 22 Q Lines 22 and 23. Do you see Mr. Ottman is 23 testifying there, "Under any reapportionment plan 24 a certain amount of disenfranchisement is 25 inevitable and unavoidable."</p>	<p>1 displacement? 2 A I don't remember. 3 Q Do you know how many people were displaced under 4 Act 43? 5 A Not off the top of my -- 6 MR. McLEOD: I'm going to assert an 7 objection to the form of the question. I 8 think it's vague and ambiguous. 9 To the extent you can answer the 10 question, please do so. 11 A Could you restate the question? 12 MR. POLAND: Could you read it 13 back. 14 (Question read) 15 A Not off the top of my head. 16 Q Do you know how many voters were disenfranchised 17 as a result of Act 43? 18 A I don't know the exact number by heart. 19 Q I would like you to take a look at the transcript. 20 A Okay. 21 Q Look at Page 31. 22 A 31. Okay. 23 Q And take a look at Lines 3 through 11. 24 A Okay. 25 Q Do you see there's a reference in Line 8 -- do you</p>
<p>1 A Yes. 2 Q And then if you look at Page 30, and I would like 3 you to look at Lines 16 through 18, you see that 4 he states there, "What we have done here is tried 5 to the best of our ability to minimize that 6 displacement." 7 A Uh-huh. 8 Q Were you involved in any analysis about a voter 9 displacement? 10 A Yes. 11 Q What was your role in that process? 12 A It's a report that is run by autoBound. 13 Q Is that just the number of voters who are 14 displaced? 15 A Yes. 16 Q Did you do anything other than run a report on 17 autoBound regarding the number of voters 18 displaced? 19 A Not that I can recall. 20 Q Did you have any discussions with anyone about 21 voter displacement with respect to Act 43? 22 A I'm sure I did. 23 Q Do you recall who you would have spoken with? 24 A Legal counsel, Tad Ottman. 25 Q Did you speak at all with Mr. Handrick about voter</p>	<p>1 see a reference to disenfranchisement of 299,704? 2 A Yes. 3 Q And does that refresh your recollection about how 4 many voters were disenfranchised by Act 43? 5 A Yes. 6 Q How does the disenfranchisement of 299,704 7 people -- how does that -- strike that question. 8 How does the statute by disenfranchising 299,704 9 people minimize disenfranchisement? 10 A I would argue the number is significantly lower 11 now. 12 Q But at the time of passage of the act that's what 13 it was, correct? 14 A At the time, yes, but it's -- it's 160,000 less or 15 so now. 16 Q Why do you say that? 17 A There were recall elections after the time of 18 testimony. 19 Q So before those recall elections occurred and the 20 time that Act 43 was passed that was the number of 21 voters disenfranchised by Act 43, correct? 22 A Yes. 23 MR. McLEOD: Form objection. I 24 think the question is vague and ambiguous. 25 To the extent you can answer, please do</p>

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1 so.

2 A At the time of Act 43 -- at the time of this

3 testimony I believe that number to be correct.

4 Q All right. And if you turn back to Page 30 and

5 you look at your testimony at the bottom of

6 Page 30, and this is Lines 23 to 25, you say, "If

7 you look at the 1992 court decision there were

8 257,000 voters temporarily disenfranchised as a

9 result of that map."

10 A Uh-huh.

11 Q And it continues over to 31, "Which at the time

12 worked out to five and a quarter percent of the

13 State's population." Do you see that testimony?

14 A Uh-huh.

15 Q And then do you see continuing in the next

16 paragraph you say, "We used that as a benchmark

17 and then what we did is we took that five and a

18 quarter percent and applied it to the new

19 population of Wisconsin of 5,600,000 and change,

20 almost 5.7 million, and came up with a number in

21 our disenfranchisement of 299,704." Do you see

22 that?

23 A Yes.

24 Q So you used the disenfranchisement percentage from

25 the 1992 court decision, correct?

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1 A In the -- yes. In the testimony, yes.

2 Q Now, in 2002 there was a court imposed plan,

3 correct?

4 A Yes.

5 Q And in 2002 the percentage of the state's

6 population that was disenfranchised was lower than

7 that, correct?

8 A Correct.

9 Q Do you recall what it was?

10 A No, but there is a memo attached to the documents

11 produced that I believe -- I'm sorry.

12 Q If you take out Exhibit No. 25 --

13 A There may be a disenfranchisement. I honestly

14 don't remember if there is or not.

15 Q So those are the documents that you produced the

16 morning.

17 A There is not -- I'm sorry. I misspoke. There is

18 not a disenfranchisement memo as part of the

19 committee packet that is Exhibit 25.

20 Q But there was a table that you produced, correct,

21 on disenfranchisement?

22 A Oh, yes. Yes.

23 Q Let's take that out.

24 A I got lost in all of the papers that we have been

25 throwing back and forth today. Where is that one

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1 hiding?

2 Q I believe it comes after the packet.

3 A After the --

4 Q After the packet that was in the clerk's

5 possession that you testified about.

6 A That's going to be back here more.

7 Q It's before those E-mails.

8 A There we go.

9 Q So you have that sheet. This had a table 2002

10 Court Submissions, correct?

11 A Yes.

12 Q If you look at the court plan in 2002, it was

13 3.14 percent of the total population that was

14 disenfranchised, correct?

15 A Yes.

16 Q And then if you look at the same table at the 1992

17 court submissions, you see the court plan was five

18 and a quarter percent, right?

19 A Yes.

20 Q In determining the number of people to be

21 disenfranchised why did you not use the

22 3.14 percent under the court plan in 2002 as the

23 standard that you were shooting for?

24 A A federal court established that this was not only

25 an acceptable level of delay in voting but they

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1 drew that map.

2 Q But you want to minimize disenfranchisement to the

3 extent possible, correct?

4 A Ideally.

5 Q Why would you not use 3.14 percent pursuant to a

6 federal court plan rather than the 5 and a quarter

7 percent pursuant to the 1992 federal court plan?

8 A Again, the disenfranchisement number is 160,000

9 lower than the number you're referencing, so the

10 percentages don't quite hold.

11 Q Now you're saying?

12 A Yes.

13 Q But I'm talking at the time that Act 43 was

14 passed.

15 A Right.

16 Q And at the time of your testimony.

17 A Right.

18 Q You testified to the joint committee that you used

19 as a benchmark the 1992 percentage --

20 A Uh-huh.

21 Q -- which was five and a quarter percent.

22 A Yes.

23 Q Why did you not use as a benchmark the

24 3.14 percent that was adopted by the court in 2002

25 as a benchmark?

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1 A This was a criteria established by the '92 court
2 that they deemed to be acceptable.
3 Q That's right. And in 2000 and 2002 the federal
4 court decided that 3.14 percent was acceptable,
5 correct?
6 A Yes.
7 Q And the goal is to minimize disenfranchisement,
8 correct?
9 A Ideally.
10 Q And so ideally a 3.14 percent disenfranchisement
11 is preferable to five and a quarter percent,
12 correct?
13 A It's lower.
14 Q So why did you not use the 3.14 percent as your
15 standard?
16 A Again, this was determined by a federal court to
17 be an acceptable amount of delayed voting.
18 Q As was 3.14 percent in 2002, correct?
19 A Correct.
20 Q Who made the decision to use five and a quarter
21 percent instead of 3.14 percent?
22 A I don't recall who made the decision.
23 Q Were you involved in that decision?
24 A I don't remember.
25 Q Did somebody tell you to use five and a quarter

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1 percent instead of 3.14 percent?
2 A I don't remember.
3 Q Was Mr. Ottman involved in that decision?
4 A Most likely.
5 Q Was Mr. Handrick involved in that decision?
6 A No.
7 Q Was legal counsel involved in that decision?
8 A I don't remember.
9 Q Can you articulate for me now as you sit here
10 today a reason that the five and a quarter percent
11 should have been used instead of 3.14 percent?
12 A I've already explained those reasons.
13 Q So you don't have anything in addition to what you
14 already testified?
15 A The only addition that I would make is that the
16 disenfranchisement as a result of the recall
17 elections that occurred in August is roughly
18 160,000 people lower than the number I testified
19 to at the time of the public hearing.
20 Q And that occurred after the time of the public
21 hearing?
22 A Whenever the senate recall elections occurred. I
23 believe sometime in early August, mid August.
24 Q But in your testimony on July 13th you did not
25 inform the joint committee that in 2002 the court

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1 had deemed 3.14 percent to be an acceptable
2 disenfranchisement percentage, correct?
3 A If that is what is reflected in the testimony.
4 Q Okay. I would like you to take a look at Page 36
5 of the transcript.
6 A Uh-huh.
7 Q If you look on Page 36, it's Mr. Ottman who is
8 testifying there.
9 A Uh-huh.
10 Q He's asked a question about why the statutes are
11 not built on ward lines.
12 A Uh-huh.
13 Q And are instead built on the census blocks.
14 A Uh-huh.
15 Q His testimony is -- if you look at Lines 10
16 through 14, he says, "Why act now, and that's
17 because the federal lawsuit is challenging the
18 State that these districts are unconstitutionally
19 mal-apportioned and that the State needs to act."
20 Do you see that testimony?
21 A Yes, I do.
22 Q Do you recall that one of the reasons that the
23 legislature did not wait to redistrict based on
24 wards was the pendency of this particular lawsuit?
25 A I'm sorry. Ask that again.

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1 MR. POLAND: Could you read the
2 question back.
3 (Question read)
4 A Based on reading this testimony, yes. It
5 refreshed my memory.
6 Q Okay. If you look at Lines 20 through 22 of that
7 same page, do you see Mr. Ottman refers to a
8 second point and he says, "Technology has moved to
9 the point where it is much easier to draw these
10 maps in advance of the locals completing their
11 process."
12 A I do see that, yes.
13 Q Do you agree with that statement?
14 A I'm not sure what exactly he's referring to there.
15 Q Do you know who made a decision to proceed with
16 redistricting based on census blocks instead of
17 wards?
18 A The legislature.
19 Q Do you know who specifically at the legislature?
20 A No.
21 Q Do you know when that decision was made?
22 A No.
23 Q Did you ever have any discussions with anyone
24 about proceeding based on census blocks as opposed
25 to wards?

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<p>1 A Yes.</p> <p>2 Q And who did you discuss that issue with?</p> <p>3 A I don't remember.</p> <p>4 Q I would like you to take a look at Pages 45 and 46</p> <p>5 of the transcript.</p> <p>6 A Okay.</p> <p>7 Q Beginning down at the bottom of Page 45 you will</p> <p>8 see Senator Erpenbach asked a question of</p> <p>9 Mr. Ottman. He says, "Did you look at the</p> <p>10 partisan makeup of the districts?" Do you see</p> <p>11 that?</p> <p>12 A Yes, I do.</p> <p>13 Q And Mr. Ottman says that information was made</p> <p>14 available to all four caucuses. And then the</p> <p>15 testimony continues on the bottom of Page 46, and</p> <p>16 Mr. Ottman says, "The principles by which the map</p> <p>17 were drawn were those that I enumerated earlier,</p> <p>18 equal population, sensitivity to minority</p> <p>19 concerns, and compact and contiguous districts."</p> <p>20 That continues on to Page 47. Do you see that</p> <p>21 testimony?</p> <p>22 A Yes.</p> <p>23 Q Do you agree with that testimony?</p> <p>24 A To what part of it? There's a lot going on there.</p> <p>25 Q Do you agree that the principles by which the map</p> <p style="text-align: center;">193</p>	<p>1 substantially similar in population and sensitive</p> <p>2 to minority concerns.</p> <p>3 Q What about maximizing republican representation in</p> <p>4 the assembly?</p> <p>5 A No.</p> <p>6 Q Not at all?</p> <p>7 A No. I stated the goals that I was given earlier.</p> <p>8 Q On Page 48, and this is in Mr. Ottman's testimony,</p> <p>9 on Line 7 he refers to reapportionment plan again.</p> <p>10 Again, you would say this is not a reapportionment</p> <p>11 plan. It's a redistricting plan; is that correct?</p> <p>12 A Sure.</p> <p>13 Q Is he simply misspeaking there? Is it your</p> <p>14 understanding --</p> <p>15 A I think it's just the word he chose to use there.</p> <p>16 Q And then in Lines 13 through 15 he says, "We</p> <p>17 prepared the plan. This is the plan that we</p> <p>18 helped prepare with directional leadership."</p> <p>19 A Uh-huh.</p> <p>20 Q Do you know who he's referring to there when he</p> <p>21 says we?</p> <p>22 A I can only assume in this context since I was</p> <p>23 sitting right next to him probably me.</p> <p>24 Q And there were in fact others who were involved in</p> <p>25 preparing the plan, the redistricting plan that</p> <p style="text-align: center;">195</p>
<p>1 were drawn were those that were equal population,</p> <p>2 sensitivity to minority concerns and compact and</p> <p>3 contiguous districts?</p> <p>4 A Yes.</p> <p>5 Q Was the map that was reflected in Act 43 -- did it</p> <p>6 reflect concerns about the partisan makeup of the</p> <p>7 districts?</p> <p>8 A Based on Mr. Ottman's testimony?</p> <p>9 Q In your opinion.</p> <p>10 A State the question again.</p> <p>11 MR. POLAND: Could you read it</p> <p>12 back.</p> <p>13 (The following was read by the reporter:</p> <p>14 Q "Was the map that was reflected in Act 43 --</p> <p>15 did it reflect concerns about the partisan</p> <p>16 makeup of the districts?")</p> <p>17 Q Strike that question. Were partisan</p> <p>18 considerations a factor in the configuration of</p> <p>19 the assembly districts in Act 43?</p> <p>20 A The election results were part of the database</p> <p>21 that was provided to us by LTSB.</p> <p>22 Q In deciding where to draw the district boundaries</p> <p>23 did partisan concerns come into play?</p> <p>24 A The concerns that came into play were drawing</p> <p>25 compact, contiguous districts that were</p> <p style="text-align: center;">194</p>	<p>1 ended up being Act 43, correct?</p> <p>2 A Yes.</p> <p>3 Q And the directional leadership that Mr. Ottman is</p> <p>4 referring to there, do you know who he is</p> <p>5 referring to?</p> <p>6 A The people I've listed earlier in the day.</p> <p>7 Q That you have identified. Is there anybody else</p> <p>8 in addition to those people who provided direction</p> <p>9 in the preparation of the plan?</p> <p>10 A No.</p> <p>11 Q Mr. Foltz, all told how many hours would you</p> <p>12 estimate you spent working on the redistricting?</p> <p>13 A No idea.</p> <p>14 Q Was it essentially a full-time endeavor for you</p> <p>15 for some period of time?</p> <p>16 A For some period of time.</p> <p>17 Q Between let's say January of 2011 and the time</p> <p>18 that Act 43 was passed by the legislature was it</p> <p>19 essentially the only thing that you were working</p> <p>20 on?</p> <p>21 A I would say that's accurate.</p> <p>22 Q What about Mr. Ottman? Do you know whether it was</p> <p>23 essentially a full-time endeavor for him?</p> <p>24 A I don't know what Tad does with his time.</p> <p>25 Q Do you generally work about 40-hour weeks?</p> <p style="text-align: center;">196</p>

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1 A Sometimes.
2 Q Sometimes more? Sometimes less?
3 A Yes. Well, I should -- my time sheets always have
4 been 40 hours a week because I'm a salaried State
5 employee. If it is requiring comp time or
6 vacation time to get to 40 hours a week, the time
7 sheet always says at least 40. Just to be clear
8 on that.
9 Q Okay. Do you know how many different maps you
10 personally were involved in drawing before
11 settling on a final version of what was introduced
12 at the legislature as Act 43?
13 A No.
14 Q Can you give me an estimate?
15 A No.
16 Q Is it in the range of 10? 15? 50? 60?
17 A No.
18 Q Did anyone outside the state of Wisconsin ever
19 show you any proposed or existing legislative
20 redistricting plans for the state?
21 A No.
22 Q Did you ever meet with or talk to any
23 representatives or officials at the Republican
24 National Committee about the new Wisconsin
25 districts?

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1 A Yes.
2 Q Who did you speak with?
3 A Mark Jefferson and Mike Wild are the two people
4 that come to mind.
5 Q When did you speak with Mr. Jefferson and
6 Mr. Wild?
7 A I don't recall.
8 Q Do you know whether it was before the passage of
9 the acts themselves?
10 A I believe before.
11 Q What was the nature of the conversations that you
12 had with them?
13 A I sent along a block assignment file.
14 Q What block assignment file did you send?
15 A Act 43. The block assignment file that eventually
16 became Act 43.
17 Q And so that was the final one that was introduced
18 to the legislature?
19 A I believe so, yes.
20 Q Do you know -- why did you send that to
21 Mr. Jefferson and Mr. Wild?
22 A It was requested of me.
23 Q Who asked you to do that?
24 A Legal counsel.
25 Q Which legal counsel in particular?

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1 A I don't recall.
2 Q Did you ask Mr. Jefferson and Mr. Wild for their
3 comments on that at all?
4 A No.
5 Q Did you speak with them about the block assignment
6 file after you had sent it?
7 A Yes.
8 Q What was the nature of that conversation?
9 A An explanation of Wisconsin standards for
10 municipal contiguity versus literal or geographic
11 contiguity.
12 Q And you were explaining the Wisconsin standards to
13 them?
14 A Correct.
15 Q Did they give you any feedback on those standards?
16 A They just pointed out that there were literal
17 geographic contiguities, and, as we know,
18 Wisconsin municipalities have a tendency to annex
19 non-contiguous areas within their city boundaries,
20 a sewer treatment plant, an airport or things like
21 that. So when you run a contiguity report, they
22 will show up as being discontinuous because they
23 don't directly touch. However, they are part of
24 the municipality.
25 Q And did you run any such reports, contiguity

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1 reports, based on autoBound?
2 A Yes.
3 Q Did you send any of those to Mr. Jefferson or
4 Mr. Wild?
5 A No.
6 Q Are any of the contiguity reports that you ran
7 produced in the files here today?
8 A No.
9 Q Do you know whether those were saved?
10 A No. They were not.
11 Q Anything else that you sent to Mr. Jefferson or
12 Mr. Wild other than the block assignment file?
13 A Not that I can recall. There was -- I sent the
14 block assignment file for Act 44 as well to them.
15 Q And did legal counsel ask that you send that as
16 well?
17 A Yes.
18 Q Did you personally participate at all in the
19 creation of that block assignment file for Act 44?
20 A No.
21 Q Do you know who did?
22 A No.
23 Q Did you have any discussions with Mr. Jefferson or
24 Mr. Wild about Act 44?
25 A No.

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<p>1 Q After you sent -- strike that question. Other 2 than the conversations that you have mentioned 3 here that you had with Mr. Jefferson and Mr. Wild, 4 did you have any communications with them with 5 respect to the redistricting in 2011? 6 A No. 7 Q Do you know whether anyone at the Republican 8 National Committee has been tasked with tracking 9 the redistricting process in Wisconsin? 10 A Not to my knowledge. 11 Q Did you ever speak with anyone at the RNC other 12 than Mr. Jefferson and Mr. Wild regarding 13 redistricting? 14 A Not that I can remember. 15 Q Did you ever communicate in any other way, E-mail, 16 text, instant messaging with anyone at the RNC 17 about redistricting in Wisconsin? 18 A No. 19 Q Did you talk with them at all by phone? 20 A No. 21 Q Not other than the conversations that you have 22 mentioned? 23 A Right. Well, I did go to a training out there. 24 Q When did you do a training out there? 25 A I don't remember.</p> <p style="text-align: center;">201</p>	<p>1 A No. 2 Q As far as you know, you were the only one from 3 Wisconsin who worked on the 2011 redistricting who 4 attended that training? 5 A That's correct. 6 (Recess) 7 Q Mr. Foltz, I'm going to hand you a copy of a 8 document that's been marked as Exhibit No. 2. 9 That's a document that Mr. Handrick brought with 10 him yesterday. 11 A Uh-huh. 12 Q It's a collection, actually, of documents that he 13 brought with him yesterday. I'm going to ask you 14 to turn to two pages in particular that, I'll just 15 show it to you, look like this. 16 A Okay. 17 Q It's maybe about halfway or so back in that 18 document. 19 A Halfway or so. 20 Q It might be a little further. There you go. 21 A Uh-huh. 22 Q If you look, there are two pages. Do you see 23 those two pages? 24 A I do. 25 Q Is this a document that you have seen before?</p> <p style="text-align: center;">203</p>
<p>1 Q By out there you mean Washington, D.C.? 2 A Correct. 3 Q Was that during the time that the redistricting 4 process was going on? 5 A No. 6 Q When did you attend a training in Washington, 7 D.C.? 8 A I believe it was spring of 2010 ballpark. 9 Q What did that training pertain to? 10 A Redistricting. 11 Q Just generally? 12 A Yes. 13 Q Was that a training or a seminar put on by the 14 RNC? 15 A That's correct. 16 Q Did Mr. Ottman attend that as well? 17 A No, he did not. 18 Q Did anyone else who worked on redistricting in 19 Wisconsin attend that training program? 20 A No. 21 Q Did any of the legal counsel who participated in 22 the redistricting in 2011 attend that training 23 program? 24 A No. 25 Q Any of the legislators?</p> <p style="text-align: center;">202</p>	<p>1 A I believe so, yes. 2 Q Do you know what this document is? 3 A Not really. 4 Q Do you see there are references -- 5 MR. SHRINER: I'm not sure this is 6 going to be identified on the record from 7 what you just said that. 8 MR. KELLY: You might want to show 9 it to the camera. 10 MR. POLAND: I'm going to describe 11 it. 12 MR. SHRINER: Go ahead. 13 Q Do you see it has numbers 1 through 99 on it on 14 both pages? 15 A Yes. 16 Q Do you know whether those pertain to 99 different 17 assembly districts? 18 A I would assume so. 19 Q Some of the numbers are in red and some are in 20 black. 21 A Uh-huh. 22 Q Do you see that? If we look at the first page of 23 these two pages up at the top it says, "Districts 24 that have been cleaned up through Thursday night 25 are red." Do you see that?</p> <p style="text-align: center;">204</p>

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<p>1 A Yes.</p> <p>2 Q Do you know what is meant by districts that have</p> <p>3 been cleaned up through Thursday night?</p> <p>4 A I do not.</p> <p>5 Q Have you seen a printout that looks like this</p> <p>6 before?</p> <p>7 A No, I haven't. Actually, I did. Yes. I did see</p> <p>8 this at one point.</p> <p>9 Q Do you know what it is?</p> <p>10 A I don't know what the reference to cleaned up is.</p> <p>11 Q Do you know generally what the printout</p> <p>12 represents?</p> <p>13 A No.</p> <p>14 Q Do you know the difference between why some</p> <p>15 districts are red and why some districts are</p> <p>16 black?</p> <p>17 A Only based on the description at the top of the</p> <p>18 page.</p> <p>19 Q And that's the fact that some are in red?</p> <p>20 A Right. Right and the description that goes with</p> <p>21 it.</p> <p>22 Q Did you ever talk with Mr. Handrick about cleaning</p> <p>23 up districts?</p> <p>24 A I don't recall.</p> <p>25 Q You can set that to the side.</p> <p style="text-align: center;">205</p>	<p>1 They have been marked as Exhibits 20, 21 and 22.</p> <p>2 A Okay.</p> <p>3 Q They are a large printout of a map?</p> <p>4 A Yes.</p> <p>5 Q I'm going to refer mostly to Exhibit No. 20 which</p> <p>6 is the top page.</p> <p>7 A Say that again.</p> <p>8 Q I'm going to refer mostly to Exhibit 20 which is</p> <p>9 the very first page.</p> <p>10 A Okay.</p> <p>11 Q I'll represent that this is a copy of Act 43 as it</p> <p>12 was passed. It was produced to us by the</p> <p>13 defendants in the case.</p> <p>14 A Uh-huh.</p> <p>15 Q I'm going to draw your attention to a few</p> <p>16 different areas of the map, and I'm going to have</p> <p>17 some questions about them.</p> <p>18 A Uh-huh.</p> <p>19 Q First I would like to draw your attention to the</p> <p>20 Beloit area. All right?</p> <p>21 A Yes.</p> <p>22 Q Do you see Beloit is split between two different</p> <p>23 legislative districts, 31 and 45?</p> <p>24 A Yes.</p> <p>25 Q Do you know why it was split in that way?</p> <p style="text-align: center;">207</p>
<p>1 A Okay.</p> <p>2 Q Through the redistricting process did you solicit</p> <p>3 comments from any legislators representing areas</p> <p>4 most significantly changed by the new districting</p> <p>5 plan?</p> <p>6 A I don't recall.</p> <p>7 Q We had talked before about -- you can actually put</p> <p>8 Exhibit 2 aside. We're done with that.</p> <p>9 You recall before we were talking about</p> <p>10 pairings of incumbents?</p> <p>11 A Uh-huh.</p> <p>12 Q In any earlier versions of the map; that is,</p> <p>13 earlier than the final version that was presented</p> <p>14 to the legislature as Act 43, were any of the</p> <p>15 republican pairings different than in Act 43 as it</p> <p>16 was passed?</p> <p>17 A I don't recall.</p> <p>18 Q For this part I'm going to get the maps out,</p> <p>19 Mr. Foltz.</p> <p>20 MR. SHRINER: That's Wisconsin,</p> <p>21 right?</p> <p>22 MR. POLAND: It's Wisconsin.</p> <p>23 MR. SHRINER: I know what it looks</p> <p>24 like.</p> <p>25 Q I'm going to hand you, Mr. Foltz, three documents.</p> <p style="text-align: center;">206</p>	<p>1 A I don't recall.</p> <p>2 Q Did you participate at all in the decision about</p> <p>3 splitting Beloit between Assembly Districts 31 and</p> <p>4 45?</p> <p>5 A I'm sorry. Say that again.</p> <p>6 Q Did you participate at all in any discussions that</p> <p>7 resulted in the splitting of Beloit into Assembly</p> <p>8 Districts 31 and 45?</p> <p>9 A I don't recall.</p> <p>10 Q Did you ever see a version of a redistricting map</p> <p>11 that included Beloit where it was all within one</p> <p>12 assembly district?</p> <p>13 A I don't recall.</p> <p>14 Q Do you know what the justification was for</p> <p>15 splitting Beloit between two different assembly</p> <p>16 districts?</p> <p>17 A I don't recall.</p> <p>18 Q I would like you to take a look at Appleton. Do</p> <p>19 you know why Appleton was split among multiple</p> <p>20 districts?</p> <p>21 A I don't recall.</p> <p>22 Q Did you participate in any discussions about</p> <p>23 splitting Appleton into multiple assembly</p> <p>24 districts?</p> <p>25 A I don't recall.</p> <p style="text-align: center;">208</p>

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1 Q Do you know what the justification was for
2 splitting Appleton into multiple districts?
3 A I don't recall.
4 Q Did either you or Mr. Ottman have any specific
5 responsibility for particular areas of the state?
6 A No.
7 Q So both of you would have worked on redistricting
8 in and around the Beloit area?
9 A Say that again.
10 Q Both of you would have worked on drawing the
11 districts in and around the Beloit area?
12 A Yes.
13 Q And same with respect to Appleton?
14 A Yes.
15 Q Do you know whether Mr. Handrick worked on those
16 districts as well?
17 A I don't know.
18 Q Did you ever speak with Mr. Handrick about
19 assembly districts in and around Beloit?
20 A I don't recall.
21 Q Do you recall ever speaking with Mr. Handrick
22 about the districts that were included in
23 -- strike that question. Did you ever speak with
24 Mr. Handrick about the assembly districts that
25 encompassed the city of Appleton?

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1 is split among?
2 A I don't know off the top of my head.
3 Q Do you know why it was decided to be put in more
4 than two assembly districts?
5 A I don't recall.
6 Q Do you know who made the decision to include
7 portions of the city of Racine and the city of
8 Kenosha within the same assembly district?
9 A I don't recall.
10 Q Did anybody ever instruct you to do that?
11 A Not that I remember.
12 Q Did you ever overhear or see anybody instructing
13 Mr. Ottman to include portions of the city of
14 Racine and the city of Kenosha in the same
15 assembly district?
16 A Not that I recall.
17 Q Are you aware of any justification for including
18 them both within the same assembly district?
19 A Could you elaborate on that?
20 Q Are you aware of any justification for including
21 portions of the city of Racine and the city of
22 Kenosha within the same assembly district?
23 A Both of those cities are too large to fit entirely
24 within one assembly district.
25 Q But the district lines could have been drawn so

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1 A I don't recall.
2 Q I would like to draw your attention down to
3 Kenosha County.
4 A Uh-huh.
5 Q Do you know why Kenosha, the city of Kenosha, was
6 split between multiple assembly districts?
7 A I'm sorry?
8 Q Do you know why Kenosha, the city of Kenosha, was
9 split among multiple assembly districts?
10 A It's too large to fit in one assembly district.
11 Q Okay. Do you know why Kenosha was split as is
12 shown in Act 43?
13 A I don't recall.
14 Q Do you know why portions of the city of Racine and
15 the city of Kenosha were included together in the
16 same assembly district?
17 A I don't recall. I should also point out that
18 Appleton is too large to fit in one assembly
19 district as well.
20 Q Do you know whether that was a criteria that was
21 considered at the time?
22 A The population of the city of Appleton?
23 Q Yes.
24 A It's too large to fit in one assembly district.
25 Q Do you know how many assembly districts Appleton

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1 that the city of Racine and the city of Kenosha
2 were not at all included in the same assembly
3 district, correct?
4 A They could have been?
5 Q Yes.
6 A Right.
7 Q And then why were they not?
8 A I don't recall.
9 Q Do you know what the justification is for
10 including them within the same assembly district?
11 A I don't recall.
12 Q Turning your attention to the city of Madison.
13 Why was the city of Madison combined into two
14 senate districts when it historically had been
15 three senate districts?
16 A I don't recall.
17 Q Were there any cities, any municipalities that you
18 split to keep districts compact?
19 A I don't recall.
20 Q Was the consideration of minority interests
21 limited to Milwaukee?
22 A Yes.
23 Q Do you know whether Act 43 establishes any single
24 Latino majority district?
25 A Yes.

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1 Q Which district or districts are Latino majority?
 2 A 8 has a Hispanic voting age population of 60 and
 3 change, and 9 has a Hispanic voting age population
 4 of 54 and change.
 5 Q And why do you consider those to be Latino
 6 majority districts?
 7 A Because it's greater than 50 percent.
 8 Q And that's the voting age population?
 9 A Yes. Those are the HVAP numbers, the voting age
 10 population numbers.
 11 Q And that did not consider citizenship, correct?
 12 A That's not part of the census.
 13 Q And so it was not considered in creating those
 14 districts, correct?
 15 A I don't know.
 16 Q Did you ever have any discussion with anyone about
 17 citizenship as being one of the criteria for the
 18 redistricting process?
 19 A I don't recall.
 20 Q How many African-American majority districts are
 21 created by Act 43?
 22 A Six.
 23 Q Did you consider creating more than six?
 24 A I don't recall.
 25 Q Do you know whether you could have created more

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1 than six African-American majority districts?
 2 A Say that again.
 3 Q Do you know whether you could have created more
 4 than six African-American majority districts?
 5 A I don't recall.
 6 Q In creating districts in the city of Milwaukee did
 7 you work with anyone with respect to the creation
 8 of Latino majority districts?
 9 A Yes.
 10 Q Who did you work with on that?
 11 A Dr. Keith Gaddie.
 12 Q What role did Dr. Gaddie play in the establishment
 13 of the Latino majority districts?
 14 A Instructed us on how to draw them in a way that he
 15 believed to be correct.
 16 Q Did the way that Dr. Gaddie instructed you to draw
 17 them end up being the final Districts 8 and 9 as
 18 incorporated into Act 43?
 19 THE WITNESS: Could you read the
 20 question back.
 21 (Question read)
 22 A No.
 23 Q There were some changes made to the districts that
 24 Dr. Gaddie had directed you to draw?
 25 A In response to MALDEF, yes.

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1 Q Were those changes that we saw reflected in the
 2 correspondence between Mr. Troupis and MALDEF?
 3 A Yes.
 4 Q What about with respect to the African-American
 5 majority districts? Did you work with anyone in
 6 drawing the African-American majority assembly
 7 districts?
 8 A Dr. Gaddie.
 9 Q And Dr. Gaddie again directed you how to draw
 10 those districts?
 11 A Uh-huh.
 12 Q Did anyone else assist in directing you how to
 13 draw the African-American majority districts?
 14 A Not that I recall.
 15 Q Did Dr. Gaddie ever discuss with you the
 16 possibility of creating more than six
 17 African-American majority districts?
 18 A I don't recall.
 19 Q Did you have any conversations at all with
 20 Mr. Handrick about drawing the Latino majority or
 21 African-American majority districts?
 22 A I don't recall.
 23 Q Have you ever had any kinds of instructions on
 24 Voting Rights Act?
 25 A I'm sorry. What do you mean by instruction?

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1 Q Have you ever had any training at all or education
 2 in the Voting Rights Act and what it requires?
 3 A Various redistricting conferences that you will
 4 attend in training do mention it.
 5 Q Nothing that was sort of a standalone training
 6 session on Voting Rights Act?
 7 A No.
 8 Q Do you know whether the Voting Rights Act applies
 9 to Milwaukee?
 10 A I'm not qualified to answer that.
 11 Q Do you know whether there are different sections
 12 of the Voting Rights Act and what they require?
 13 A I know there are different sections of the Voting
 14 Rights Act.
 15 Q Do you know if any of those particular sections
 16 apply to Milwaukee?
 17 A I'm not qualified to answer that.
 18 Q Have you ever heard that any of the sections of
 19 the Voting Rights Act apply to Milwaukee?
 20 A Have I heard?
 21 Q Correct.
 22 A Not that I can recall.
 23 Q Did anyone ever tell you that sections of the
 24 Voting Rights Act apply to Milwaukee?
 25 A Not that I can recall.

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1 Q Were there any particular steps that you took to
 2 minimize splitting of counties and municipalities
 3 in Act 43?
 4 A Any steps we took to minimize the --
 5 Q The splitting of counties and municipalities in
 6 drawing the map that ended up as Act 43.
 7 A Not that I can recall.
 8 Q Did you do any kind of evaluation of municipal
 9 splits in the state?
 10 A Yes.
 11 Q And what was that evaluation that you undertook?
 12 A The autoBound reports that show splits based on
 13 different levels of census geography for the
 14 assembly and senate plans and also an examination
 15 of where previous courts had been on those
 16 questions.
 17 Q When you looked at examination of where previous
 18 courts had been, do you mean that you looked at
 19 the opinions that they wrote on the issue of
 20 municipal splits?
 21 A Yes.
 22 Q Was that from 2002 and then 1992, those
 23 redistricting opinions?
 24 A I believe so, yes.
 25 Q I would like to draw your attention to the city of

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1 Marshfield.
 2 A Uh-huh.
 3 Q Do you see Marshfield is split into two different
 4 assembly districts, the 69th and the 86th?
 5 A Uh-huh.
 6 Q Do you know why Marshfield was split between two
 7 different assembly districts?
 8 A I don't recall.
 9 Q Did you ever see any versions of Act 43 or the
 10 maps that eventually became Act 43 where
 11 Marshfield was not split into two different
 12 assembly districts?
 13 A I don't recall.
 14 Q Do you know whether Act 43 could have been drawn
 15 such that Marshfield was wholly contained within a
 16 single assembly district?
 17 A Could it have potentially been drawn another way?
 18 Q Correct.
 19 A Yes.
 20 Q Do you know why it was not?
 21 A No.
 22 Q Did you ever participate in any discussions about
 23 splitting Marshfield between two different
 24 assembly districts?
 25 A Not that I recall.

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1 Q Did anybody instruct you to split Marshfield into
 2 two different assembly districts?
 3 A Not that I recall.
 4 Q Do you know what justification there is for
 5 splitting Marshfield between two different
 6 assembly districts?
 7 A Not that I'm aware of.
 8 (Discussion off the record)
 9 Q Mr. Foltz, speaking statewide, do you know how
 10 many people needed to be moved to new districts
 11 from existing districts to comply with equal
 12 population requirements?
 13 A No.
 14 Q Do you know how many were actually moved?
 15 A No.
 16 Q If I told you that seven times more people were
 17 moved than needed to be moved, can you tell me why
 18 that was done?
 19 MR. KELLY: Objection, form.
 20 You can answer that if you can.
 21 A I would have to see that analysis.
 22 Q Assuming that analysis, assuming those numbers are
 23 true, do you know overall why that many more
 24 people were moved than needed to be moved?
 25 MR. McLEOD: Object to the form of

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1 the question.
 2 A I can't comment without seeing how that number was
 3 achieved.
 4 Q Were you involved in determining which voters
 5 should be moved or which residents should be moved
 6 from one assembly district under the 2002 plan to
 7 a new district under the 2011 redistricting plan?
 8 A It's kind of part and parcel of drawing a new map.
 9 Q And when you did move residents from one district
 10 to a new district, were there justifications that
 11 were developed for doing that?
 12 A Not that I can recall.
 13 Q So if there was a specific district where there
 14 were say 20 people who needed to be moved to
 15 comply with equal population requirements and a
 16 greater number than 20 were moved, was there any
 17 particular kind of justification that was
 18 developed for why that was done?
 19 A Again, I'm having trouble with that approach to
 20 redistricting in how you're phrasing the question.
 21 If a district is in your scenario overpopulated by
 22 20 and it needs to go out and get 20 more people,
 23 that assumes that every district is the first
 24 district drawn in the state. It has no accounts
 25 for the spacial nature of redistricting. It has

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<p>1 no account for what happened 200 miles away. 2 There's ripple effects in redistricting. If a 3 district is underpopulated or overpopulated by 20, 4 if you need to go and grab another 20 -- in a 5 perfect world where every district was the first 6 and only district drawn, that analysis would 7 apply. Here it doesn't. 8 Q Was there any kind of written explanation created 9 for why certain numbers of residents were moved 10 from one district to another? 11 A No. 12 Q Was there any kind of -- in the memorandums that 13 were created -- there are numbers portrayed in 14 those memos, correct? 15 A Yes. 16 Q They're not justifications for why things were 17 done; is that correct? 18 A I believe that's accurate. 19 Q Do you know whether during the course of 20 redistricting were there communications between 21 the people who were involved in the redistricting 22 process that talked about moving residents from 23 one assembly district to a different assembly 24 district? 25 A To me what you're referring to is a core</p> <p style="text-align: center;">221</p>	<p>1 population retention was memorialized at all? 2 A Not that I'm aware of. 3 Q Are there any other tools that you know of other 4 than the autoBound software to evaluate core 5 population retention? 6 A Yes. 7 Q What other tools are there? 8 A Maptitude redistricting software. 9 Q I'm sorry. Maptitude? 10 A Yes. 11 Q Did you use Maptitude at all? 12 A No. 13 Q Have you used Maptitude in the past? 14 A No. 15 Q Did Mr. Ottman also work to generate core 16 constituency reports? 17 A I would assume he did. 18 Q Did you ever see any that he produced? 19 A I'm sure I did at some point. 20 Q Do you know whether Mr. Handrick ever produced any 21 core constituency reports? 22 A I don't know. 23 Q Did you consult with Mr. Handrick at all on the 24 core constituency reports that you prepared? 25 A The core constituency reports are generated by</p> <p style="text-align: center;">223</p>
<p>1 constituency report, how many people moved from 2 District X to District Y. Core constituency 3 reports were produced at various times during the 4 process as I testified to earlier. 5 MR. SHRINER: This whole discussion 6 is somewhat metaphorical, isn't it? The 7 residents don't move. The legislators don't 8 make them move. You're talking about where 9 you draw the lines. 10 MR. POLAND: Where you draw the 11 lines with districts. That's correct. Not 12 physically moving, of course. Moving them 13 from one district -- 14 MR. SHRINER: Moving the number of 15 the district that they're in and the shape? 16 MR. POLAND: That's correct. 17 That's correct. 18 Q How did you do the evaluation of core population 19 retention of the 2002 districts? Was that done 20 through the autoBound software? 21 A Yes. 22 Q And so those analyses are contained in the core 23 constituency reports that were produced? 24 A That is what a core constituency report is. 25 Q Is there any other way in which the core</p> <p style="text-align: center;">222</p>	<p>1 autoBound. 2 Q And a person has to actually hit a print command 3 or has to do something to generate the printing of 4 that report, correct? 5 A Yes. 6 Q And you did that at times? 7 A Yes. 8 Q All right. With any of those reports that you 9 created and that you printed, did you ever discuss 10 any of those with Mr. Handrick? 11 A On core constituency specifically? 12 Q Correct. 13 A I'm sure I did. I can't recall which specific 14 ones or specific versions, but, yes, I'm sure at 15 some point he saw a core constituency report. 16 Q Did you take communities of interest into account 17 at all in drawing the legislative district 18 boundaries? 19 A It is a traditional redistricting criteria. 20 Q And did you take them into account? 21 A Yes. 22 Q How did you take them into account? 23 A By taking them into account in the drawing of the 24 map. 25 Q And how did you gather information about</p> <p style="text-align: center;">224</p>

1 communities of interest?
 2 A I don't understand the question.
 3 Q What information specifically with respect to
 4 communities of interest did you take into account?
 5 A It's difficult to say because communities of
 6 interest is such a broad term. It really has no
 7 specific definition.
 8 Q Can you identify anything for me that you took
 9 into account in maintaining communities of
 10 interest?
 11 A I'm really not following the question. Again, a
 12 community of interest can be defined as a school
 13 district, a tech college district, a county. So
 14 all of those could be classified as a community of
 15 interest.
 16 Q Did you take any of those into account in the
 17 process of drawing the assembly districts?
 18 A No. I did not draw the map based on school
 19 districts but, yes, communities of interest were
 20 taken into account.
 21 Q And which specific ones did you take into account?
 22 A I don't recall.
 23 Q Did you evaluate any specific historical data on
 24 how communities of interest across the state had
 25 been housed in senate and assembly districts in

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1 the past when drawing Act 43?
 2 A I had access to printouts of old redistricting
 3 maps.
 4 Q Did you consult them specifically with respect to
 5 maintaining communities of interest in those old
 6 redistricting maps?
 7 A I don't recall.
 8 Q Did you receive any input from any communities of
 9 interest or local municipalities when you were
 10 drawing the maps?
 11 A If they testified, they did so at the public
 12 hearing which should be reflected in the record.
 13 Q Other than the testimony reflected in the public
 14 record, did you receive any input from communities
 15 of interest or local municipalities when drawing
 16 the maps?
 17 A No.
 18 Q Did you receive any input at all from democratic
 19 lawmakers in drawing the maps?
 20 A The public hearing.
 21 Q Other than the public hearing?
 22 A No.
 23 Q Do the 2011 legislative maps reflected in
 24 Act 43 -- strike that. Does Act 43 create a
 25 partisan advantage for republicans or democrats?

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1 A I'm not qualified to answer that.
 2 Q Does Act 43 specifically state that it doesn't go
 3 into effect until the general elections in 2012?
 4 A I don't know. If that's what the legislation
 5 says. I'm not sure.
 6 Q Do you know why that provision was included?
 7 A No.
 8 MR. POLAND: Give me just a minute.
 9 Peter, I'm just going to check my notes
 10 here for a second.
 11 MR. EARLE: Okay.
 12 Q You testified earlier, Mr. Foltz, that as a
 13 staffer you do keep time sheets of your activity;
 14 is that correct?
 15 A Yes.
 16 Q Do those reflect people that you're speaking with
 17 or working with?
 18 A No.
 19 Q Generally what kind of information is reflected in
 20 those time sheets?
 21 A Number of hours worked.
 22 Q Is there anything other more than that, a general
 23 description at all?
 24 A No.
 25 MR. POLAND: Those are all of the

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1 questions I have at this time.
 2 Peter?
 3 MR. EARLE: Thank you.
 4
 5 EXAMINATION
 6 By Mr. Earle:
 7 Q Mr. Foltz, I have just a few questions to clarify
 8 my understanding of your testimony today. The
 9 E-mail -- I have copies of the E-mails that were
 10 brought by you today that were sent to me by
 11 E-mail.
 12 A Uh-huh.
 13 Q The first one is an E-mail from -- it appears to
 14 be an E-mail from Mr. Ottman to Mr. Gaddie. It
 15 has some figures on it for the HVAP for three
 16 different options for the 8th and 9th assembly
 17 districts. Can you grab that?
 18 A I'm paging through right now. What was the header
 19 of that, the subject?
 20 Q Wisconsin Hispanic Districts. It's dated Sunday,
 21 July 17, 2011 at 11:40 a.m.
 22 A I have tracked it down.
 23 Q Got it?
 24 A Yes.
 25 Q Okay. Great. Which of those three maps was the

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1 MALDEF proposal? There are three HVAP listings
 2 there.
 3 A The MALDEF proposal was a version of a 60/53 that
 4 we modified and they were agreeable to.
 5 Q 60/53? So that would be the modified -- that
 6 modification was the map that was ultimately
 7 adopted; is that correct?
 8 A No. There was discussions between the two parties
 9 where they offered a 60/53 alternative that would
 10 have required the redrawing of at least four other
 11 assembly districts to which we responded with a
 12 proposal that held the HVAP numbers or actually
 13 slightly improved upon those numbers and prevented
 14 us from having to redraw additional assembly
 15 districts.
 16 Q That's Amendment Two?
 17 A Yes. Yes. Amendment Two is the result of the
 18 conversations with MALDEF.
 19 Q Now, let me ask you, was there an effort to draw
 20 the 8th assembly district so as to have the Latino
 21 community constitute an effective voting majority
 22 within that district?
 23 MR. McLEOD: I'm going to assert an
 24 objection to the form of the question, but
 25 you can answer.

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1 MR. EARLE: What's wrong with the
 2 form of the question?
 3 MR. McLEOD: I don't know what
 4 effective means. It's vague and ambiguous.
 5 MR. EARLE: It means effective as
 6 defined in the United States dictionary,
 7 common usage. An effective voting majority.
 8 Q Do you understand the term, Mr. Foltz?
 9 A I'm not a lawyer.
 10 Q You're a speaker of the English language, correct?
 11 A I dabble.
 12 Q I'm asking you whether there was an effort made to
 13 draw the 8th assembly district so as to have
 14 within that district an effective voting majority
 15 of Latinos.
 16 A And I'll refer you to the E-mails with MALDEF.
 17 There was a 65/40 proposal that was given to
 18 MALDEF, and MALDEF encouraged us to back that
 19 number off to a 60/53 which then ended up being a
 20 60/54 based on our conversations going back and
 21 forth with MALDEF.
 22 Q But I would like you to answer my question. Was
 23 there an effort made to draw the 8th assembly
 24 district in which you participated -- I'll
 25 rephrase the question. Was there an effort made

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1 in which you participated to draw the boundaries
 2 of the 8th assembly district so as to have within
 3 that district an effective voting majority of
 4 Latinos?
 5 MR. KELLY: I'll object to form as
 6 well with respect to the continued use of the
 7 word effective. I'm a lawyer, and I don't
 8 understand what that means and I speak
 9 English rather well.
 10 MR. EARLE: I won't comment on
 11 that, Eric.
 12 MS. LAZAR: That was Dan Kelly.
 13 MR. SHRINER: That is because Eric
 14 is not a smart ass.
 15 Q Will you please answer the question. Was there an
 16 effort made to draw the 8th assembly district so
 17 as to have within that district an effective
 18 voting majority of Latinos?
 19 A Again, I don't understand the term effective
 20 voting majority of Latinos. What I know is that
 21 we spoke to MALDEF, the preeminent group for
 22 Hispanic rights with regard to redistricting
 23 rights within the country, and they encouraged us
 24 to move our amendment from a 64/50 or 57/57 split
 25 to what was ultimately adopted as 60/54.

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1 Q We'll explore the question of MALDEF in a moment.
 2 I just want to know whether there was a conscious
 3 effort by those involved in this redistricting
 4 plan to create a district in which there was an
 5 effective voting majority of Latinos.
 6 A Well, since my understanding --
 7 Q Can you just tell me yes there was or no there
 8 wasn't? That's what I'm trying to figure out,
 9 whether there was or there wasn't. And, if there
 10 was, who was involved in it.
 11 A And I'm still trying to figure out your definition
 12 of effective voting majority.
 13 Q What do you suppose an effective voting majority
 14 means, Mr. Foltz?
 15 A You can answer that for me.
 16 Q What do you suppose it means?
 17 A I'm not going to engage in speculation on what
 18 you're trying to ask me.
 19 Q How do you interpret the word effective? How
 20 would you interpret the words effective voting
 21 majority in the context of normal usage?
 22 A I am not a lawyer, demographer or political
 23 scientist, so I don't feel I'm qualified to answer
 24 the specific definition of that.
 25 Q Okay. Did you consider at any point or are you

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1 aware of whether anybody involved in the
2 redistricting plan considered citizenship?
3 A I'm sorry. Say that again.
4 Q Did anybody consider citizenship who was involved
5 in the redistricting planning process?
6 A I don't recall.
7 Q Are you aware of any factors that were considered
8 with regards to whether the Latino community has
9 less of an opportunity to participate in the
10 political process?
11 A Well, I know that the federal court in 2002 passed
12 the map at a 58 percent Hispanic voting age
13 population and successfully performed for the
14 decade electing both Peter Colon and
15 JoCasta Zamarripa.
16 Q What kinds of factors do you think would be
17 appropriate to consider to determine whether or
18 not Latinos have less of an opportunity to
19 participate in the political process?
20 A Well, I would say that the district being more
21 Hispanic than the one the federal court drew ten
22 years ago is a good place to start.
23 Q Now, who actually spoke with MALDEF?
24 A Jim Troupis.
25 Q You never spoke with anybody from MALDEF, correct?

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1 A Correct.
2 Q Do you know whether Mr. Ottman ever spoke with
3 anybody from MALDEF?
4 A I do not know that.
5 Q Do you know whether Mr. Handrick ever spoke with
6 anyone from MALDEF?
7 A I do not know that.
8 Q Is it your understanding that the only person who
9 spoke with anybody from MALDEF is Mr. Troupis?
10 A To the best of my knowledge, yes.
11 Q So all the information you have about what MALDEF
12 said about the maps comes from statements made to
13 you by Mr. Troupis? Is that an accurate
14 statement?
15 MR. McLEOD: I'm going to object to
16 the form of the question. The question is
17 now asking for oral communications between
18 Mr. Troupis and Mr. Foltz which constitutes
19 attorney-client privileged information. I
20 hate to make lengthier objections than that,
21 but the substance of what's being discussed
22 here relates to an E-mail communication
23 that's been produced because it's responsive.
24 It does not implicate conversations and it
25 certainly does not allow for questions

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1 related to conversations between counsel and
2 Mr. Foltz that are attorney-client
3 privileged.
4 MR. EARLE: So you're directing the
5 witness not to answer that question?
6 MR. McLEOD: If your question is
7 what was the substance of a conversation that
8 Mr. Troupis had with Mr. Foltz, then, yes,
9 I'm instructing the witness not to answer.
10 Q You're going to abide by that instruction,
11 Mr. Foltz?
12 A Yes.
13 Q Yes?
14 A Yes.
15 Q Is the source of your information about what
16 MALDEF said anything other than what's the content
17 of the E-mail that has been produced today?
18 A Nope.
19 Q That's the entire source of your knowledge about
20 what MALDEF said?
21 A Yes.
22 Q The last set of questions had to do with the
23 attachment to the map, the E-mails. I have in
24 front of me a map that has a blue district and a
25 green district with some dark lines drawn around

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1 it. Can you grab that?
2 A Yes. Got it.
3 Q Got it?
4 A Yes. I have it.
5 Q Could you indicate to me how we identify that map
6 for the record? What exhibit is that part of?
7 MR. SHRINER: The last page of
8 whatever exhibit it is.
9 MS. LAZAR: The second to the last
10 page of Exhibit 25.
11 Q If you could help me understand this. I can see
12 the 8th and 9th districts with a dark blue line
13 around the 8th and a black line around the 9th.
14 A Yes.
15 Q Do you see that there?
16 A Yes, I do.
17 Q And it's my understanding -- correct me if I'm
18 wrong here, but it's my understanding that the
19 blue, the light blue, is what MALDEF produced as a
20 proposed 8th assembly district; is that correct?
21 A The light blue solid colored district, yes.
22 Q And the light green is what MALDEF produced as a
23 proposed 9th assembly district, correct?
24 A That's correct.
25 Q And the reason this proposal was rejected was that

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1 the 8th and 9th assembly districts as they
2 proposed them went outside the boundaries of the
3 combined districts as had been developed by you
4 and the others working on the redistricting team,
5 correct?
6 A Yes.
7 Q So in other words, the redistricting team was
8 willing to consider alternate configurations of
9 the 8th and 9th assembly districts as long as the
10 outside boundaries of those two districts combined
11 were not altered; is that correct?
12 A Well, I don't want to say that we would not
13 consider it. We did consider it and offered a
14 counterproposal which MALDEF was agreeable to.
15 Q Is it accurate to say that you and the other
16 members of the redistricting team did not want to
17 alter the outside boundaries of the 8th and 9th
18 assembly districts as you had drawn them?
19 A Well, as the E-mail will indicate, it was
20 preferable.
21 Q Why was it preferable to avoid altering those
22 boundaries?
23 A Because it would have required the redrawing of
24 several other districts.
25 Q Did you consider whether -- let me strike that.

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1 Let me rephrase that. In the event it was
2 possible to draw an 8th assembly district with an
3 effective voting majority of Latinos but as a
4 result of drawing such a map it would be required
5 to alter those lines -- strike that. Let me
6 rephrase it. What I'm trying to figure out,
7 Mr. Foltz, is whether or not the option of
8 creating a district with an effective voting
9 majority of Latinos was precluded because you did
10 not want to alter the outside lines of the 8th and
11 9th assembly districts as you had already come up
12 with them.
13 MR. KELLY: Objection, form.
14 A And I will just go back to the lacking a
15 definition from you of effective voting majority.
16 I can't give you any more than that.
17 Q When I say effective voting majority, Mr. Foltz,
18 I'm talking about a voting majority of Latinos who
19 are citizens and of voting age. Obviously you
20 would agree with me that you have to be of voting
21 age in order to vote, correct?
22 A Seems reasonable.
23 Q And you have to be a citizen in order to vote,
24 correct?
25 A Also seems reasonable.

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1 Q Was any effort made to determine whether or not an
2 effective voting majority of Latino citizens of
3 voting age was possible?
4 A Say that again.
5 Q Was any effort made to determine whether or not it
6 was possible to draw a district that contained
7 within it a majority of Latinos who are citizens
8 of voting age?
9 A I'm not qualified to answer that question. Again,
10 not being a demographer, political scientist or a
11 lawyer.
12 Q I didn't ask you an opinion, sir. I asked you
13 whether any effort was made to draw a district, an
14 assembly district on the near south side of
15 Milwaukee, that contained within it a majority of
16 Latinos who are citizens of voting age.
17 A Well, again, since citizenship is not part of the
18 census data, it requires extrapolation techniques
19 that I'm not qualified to answer. Again, I'm not
20 a demographer, a political scientist, and CVAP is
21 not part of the census.
22 Q I understand that you have limited qualifications.
23 I'm simply asking you whether an effort was made
24 as part of the redistricting process to draw a map
25 that contained a majority of Latinos who were

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1 citizens of voting age. That's a simple query.
2 Was such an effort undertaken, yes or no?
3 A Again, I'm not qualified to answer that.
4 Q You participated in the redistricting process,
5 correct?
6 A Yes.
7 Q Are you aware of whether any effort was made by
8 anyone participating in the redistricting process
9 over whether or not there was -- whether or not a
10 map could be drawn in which there was a majority
11 of Latinos who were citizens of voting age?
12 MR. KELLY: I'll object to the form
13 of the question. Just in case you're
14 interested in what I think the problem of the
15 form is, it's a compound question. It calls
16 for knowledge that Mr. Foltz has already said
17 that he did not have; to wit, the citizenship
18 of the voting age population in the proposed
19 District 8.
20 Q Mr. Foltz, did you --
21 MR. EARLE: I'll withdraw the
22 question and rephrase it.
23 Q Are you aware of whether or not any effort was
24 made by anybody participating in the redistricting
25 process to determine whether or not a district

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1 could be drawn in which there was a majority of
 2 Latino citizens?
 3 A Say that again.
 4 MR. EARLE: Could you read the
 5 question back.
 6 (Question read)
 7 A I do not have any reports produced by Dr. Gaddie
 8 reflecting that information.
 9 Q Did you speak with Dr. Gaddie about the 8th and
 10 9th assembly districts?
 11 A Yes.
 12 Q When you spoke with him, who was present?
 13 A I don't remember.
 14 Q Where were you when you spoke with him?
 15 A Michael Best.
 16 Q On how many occasions did you speak with him about
 17 the 8th and 9th assembly districts?
 18 A I don't recall.
 19 Q Now, I'm talking about in the planning process
 20 before Act 43 was adopted.
 21 A I don't recall.
 22 Q Was it more than once?
 23 A I don't recall.
 24 Q Your answer was yes you did speak with him, so
 25 it's at least once, correct?

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1 A Yes.
 2 Q But you don't know whether it was 5, 10, 15, 20 or
 3 30 times?
 4 A No.
 5 Q Did you take any notes at any time regarding your
 6 conversations with Mr. Gaddie about the 8th and
 7 9th assembly districts?
 8 A Not that I'm aware of.
 9 Q Did you send any E-mails about the 8th and 9th
 10 assembly districts?
 11 A You have those.
 12 Q Excuse me?
 13 A You have those.
 14 Q Those are the only ones that you generated?
 15 A Yes.
 16 Q Did Dr. Gaddie make any recommendations as to how
 17 to draw the 8th and 9th assembly districts?
 18 A Yes.
 19 Q What recommendations did he make?
 20 A I don't recall exactly what he said.
 21 Q Did he give you anything in writing?
 22 A No.
 23 Q Did he draw any maps for you?
 24 A No.
 25 Q Did he tell you what factors to consider?

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1 A Say that again.
 2 Q Did he tell you what factors to consider in
 3 drawing the 8th and 9th assembly districts?
 4 A Not that I can recall.
 5 Q Did you overhear any conversations between
 6 Dr. Gaddie and anybody else?
 7 A Not that I can recall.
 8 Q Did you meet with JoCasta Zamarripa regarding the
 9 8th assembly district?
 10 A She sits on the committee that heard the bill.
 11 Q I'm asking you whether you met with her about it.
 12 A She was at the committee hearing. She was
 13 present.
 14 MR. EARLE: I have no further
 15 questions.
 16 MR. KELLY: Then I think we're
 17 done.
 18 MR. McLEOD: I have one matter I
 19 want to follow up on.
 20
 21 EXAMINATION
 22 By Mr. McLeod:
 23 Q Mr. Foltz, you were asked earlier by Mr. Poland
 24 whether you had provided counsel with all
 25 documents that are responsive to the subpoena. Do

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1 you remember that?
 2 A Yes.
 3 Q Did you in fact to the best of your knowledge
 4 provide counsel with all documents which are
 5 responsive to the subpoena?
 6 A Yes.
 7 Q To your knowledge have you withheld any E-mail
 8 correspondence between you and Joe Handrick on
 9 grounds that any such E-mail correspondence was
 10 subject to any privilege?
 11 A No.
 12 MR. McLEOD: Thank you. Nothing
 13 else.
 14
 15 RE-EXAMINATION
 16 By Mr. Poland:
 17 Q I have one follow-up question to that. There were
 18 documents that you located that were responsive to
 19 the subpoena that you did not produce today,
 20 correct?
 21 A Correct.
 22 Q And those are documents that there is a privilege
 23 asserted over, correct?
 24 A Yes.
 25 Q And that's the reason that you didn't produce them

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1 today?
 2 **A** Yes.
 3 MR. POLAND: No further questions.
 4 MR. EARLE: One last question on
 5 that.
 6
 7 RE-EXAMINATION
 8 By Mr. Earle:
 9 **Q** Did any of those documents that were not produced
 10 today under privilege grounds -- was Mr. Handrick
 11 a recipient of the any of those documents or a
 12 sender of any of those documents?
 13 **A** No. Not that I recall.
 14 MR. EARLE: Are we going to be
 15 provided with a log?
 16 MR. McLEOD: Yes. Peter,
 17 Eric McLeod here. We did -- since you're not
 18 here, you didn't receive it from us. You
 19 will receive a copy of the privilege log
 20 which identifies the documents that have been
 21 withheld and the basis for the privilege.
 22 MR. EARLE: Thank you.
 23 MR. POLAND: Just to be clear about
 24 that, Eric, is that the written piece that
 25 you provided this morning?

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1 MR. McLEOD: That's correct.
 2 MR. POLAND: Peter, just to be
 3 clear about it, I believe that we scanned and
 4 sent this to you. This is the document that
 5 Eric brought this morning that says Documents
 6 Produced in Response to Subpoena Issued by
 7 Plaintiffs to Adam Foltz.
 8 MR. EARLE: Yes.
 9 MR. POLAND: And then dated today.
 10 MR. EARLE: Okay. Thank you.
 11 MR. POLAND: That's the privilege
 12 log that you're referring to, Eric.
 13 MR. McLEOD: That is correct.
 14 MS. LAZAR: It's marked as
 15 Exhibit 24.
 16 (Adjourning at 4:41 p.m.)
 17
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1 STATE OF WISCONSIN)
) ss.
 2 COUNTY OF DANE)
 3 I, SUSAN C. MILLEVILLE, a Court Reporter
 4 and Notary Public duly commissioned and qualified in
 5 and for the State of Wisconsin, do hereby certify
 6 that pursuant to subpoena, there came before me on
 7 the 21st day of December 2011, at 10:21 in the
 8 forenoon, at the offices of Godfrey & Kahn, S.C.,
 9 Attorneys at Law, One East Main Street, the City of
 10 Madison, County of Dane, and State of Wisconsin, the
 11 following named person, to wit: ADAM R. FOLTZ, who
 12 was by me duly sworn to testify to the truth and
 13 nothing but the truth of his knowledge touching and
 14 concerning the matters in controversy in this cause;
 15 that he was thereupon carefully examined upon his
 16 oath and his examination reduced to typewriting with
 17 computer-aided transcription; that the deposition is
 18 a true record of the testimony given by the witness.
 19 I further certify that I am neither
 20 attorney or counsel for, nor related to or employed
 21 by any of the parties to the action in which this
 22 deposition is taken and further that I am not a
 23 relative or employee of any attorney or counsel
 24 employed by the parties hereto or financially
 25 interested in the action.

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1 In witness whereof I have hereunto set my
 2 hand and affixed my notarial seal this 22nd day of
 3 December 2011.
 4
 5
 6 Notary Public, State of Wisconsin
 7 My commission expires
 8 June 23, 2013
 9
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December 13, 2011

VIA HAND DELIVERY

Adam Foltz
c/o Attorney Eric M. McLeod
Michael Best & Friedrich LLP
100 East Wisconsin Avenue, Suite 3300
Milwaukee, WI 53202

RE: *Baldus et al. v. Brennan et al.*
Eastern District of Wisconsin Case No. 11-CV-562

Dear Mr. Foltz:

Pursuant to our discussion with your counsel earlier this week, we have enclosed a Subpoena requiring your appearance for a deposition scheduled for December 21, 2011 beginning at 9:00 a.m. at the law offices of Godfrey & Kahn, S.C., 780 N. Water Street, Milwaukee, Wisconsin 53202.

The subpoena also requires that you produce at the deposition documents that are identified in the subpoena. Also, enclosed is a check for \$126.58 as payment for the statutory witness and mileage fees.

Please call me at (608) 257-3911 with any questions.

GODFREY & KAHN, S.C.



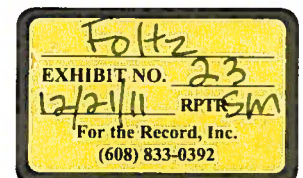
Douglas M. Poland
Rebecca Kathryn Mason

WKA:js

Enclosure

cc: Maria Lazar (w/ encl, via Hand Delivery)
Patrick Hodan (w/ encl, via Hand Delivery)
P. Scott Hassett (w/ encl, via Hand Delivery)
Thomas Shriner (w/ encl, via E-mail and U.S. Mail)
Peter Earle (w/ encl, via E-mail and U.S. Mail)

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AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

ALVIN BALDUS, et al.)
Plaintiff)
v.) Civil Action No. 11-CV-562-JPS
Members of the Wisconsin Government Accountability Board, each)
only in his official capacity: MICHAEL BRENNAN, et al.) (If the action is pending in another district, state where:
Defendant))

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Adam Foltz
Wisconsin State Capitol, 2 East Main Street, Room 211 West, Madison, WI 53707

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is not a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Table with 2 columns: Place and Date and Time. Place: GODFREY & KAHN, S.C., 780 N. Water Street Milwaukee, WI 53202, PH: 414-273-3500. Date and Time: 12/21/2011 9:00 am

The deposition will be recorded by this method: The deposition will be recorded by stenographic and audiovisual means.

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Exhibit A attached.

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 12/13/2011

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk OR Attorney's signature (with handwritten signature)

The name, address, e-mail, and telephone number of the attorney representing (name of party) Plaintiffs Alvin Baldus, et al., who issues or requests this subpoena, are: Attorney Douglas M. Poland, GODFREY & KAHN, S.C., One East Main Street, Suite 500, Madison, WI 53703, Telephone: (608) 284-2625, Email: dpoland@gklaw.com

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 11-CV-562-JPS

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I served the subpoena by delivering a copy to the named individual as follows: _____

_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)**(c) Protecting a Person Subject to a Subpoena.**

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney’s fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party’s officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party; or

(iii) a person who is neither a party nor a party’s officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty’s failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

Exhibit A

You, or your representatives, must bring with you to the deposition the following documents, communications, electronically stored information or objects (whether sent or received) (collectively “documents”) that are in your actual or constructive possession, custody or control, and permit the inspection, copying, testing or sampling of the material:

1. All documents, including but not limited to e-mail, concerning any analyses, data, plans, procedures and/or reports used by state legislative staff and/or any consultants or experts in the planning, development, negotiation, drawing, revision or redrawing of the maps codified in Wisconsin Acts 43 and 44 or any other potential congressional or legislative plan that was not adopted.
2. All documents, including but not limited to e-mail, concerning the objectives and/or motives relied on by – or available to – state lawmakers, their staff and/or any consultants or experts in the planning, development, negotiation, drawing, revision or redrawing of the maps codified in Wisconsin Acts 43 and 44 or any other potential congressional or legislative plan that was not adopted.
3. All documents, including but not limited to e-mail, concerning the identities of persons who participated in the planning, development, negotiation, drawing, revision or redrawing of the maps codified in Wisconsin Acts 43 and 44.
4. All documents, including but not limited to e-mail, concerning the identities, contractual agreements and compensation of any experts and/or consultants (including attorneys retained by contract) retained to assist in the planning, development, negotiation, drawing, revision or redrawing of the maps codified in Wisconsin Acts 43 and 44 or any other potential congressional or legislative plan that was not adopted.
5. All documents, including but not limited to e-mail, concerning the objective facts that legislative staff and/or any experts or consultants referenced, used or relied upon – or available to – in the planning, development, negotiation, drawing, revision or redrawing of the maps codified in Wisconsin Acts 43 and 44 or any other potential congressional or legislative plan that was not adopted.

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

GODFREY KAHN S.C.

053908

One East Main Street
Madison, WI 53703

M&I MARSHALL & ILSLEY BANK
MILWAUKEE, WI 53202

12-5
750

VOID AFTER 90 DAYS

PAY

ONE HUNDRED TWENTY-SIX AND 58/100

DATE

AMOUNT

12-02-2011

\$ 126.58

TO
THE
ORDER
OF

ADAM FOLTZ
WISCONSIN STATE CAPITOL
2 EAST MAIN STREET, ROOM 211 WEST
MADISON, WI 53702

Handwritten Signature

AUTHORIZED SIGNATURE

⑈053908⑈ ⑆07500005⑆ 00122⑈63064⑈

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, et al.,

Plaintiffs,

v.

Case No. 11-CV-562

MEMBERS OF THE WISCONSIN
GOVERNMENT ACCOUNTABILITY BOARD, et al.,

Defendants.

**DOCUMENTS PRODUCED IN RESPONSE TO SUBPOENA
ISSUED BY PLAINTIFFS TO ADAM FOLTZ**

Adam Foltz, through his attorneys, produces the enclosed documents in response to the subpoena issued by Plaintiffs on December 13, 2011, in the above-captioned matter. Mr. Foltz has also withheld certain privileged documents described in the following privilege log. Mr. Foltz has also withheld documents which constitute attorney-client communications.

Privilege Log

The following documents or categories of documents are privileged and are, therefore, not being produced.

1. July 7, 2011 email between Legislative Staff Member Adam Foltz and State Representative regarding area alternatives.

Grounds for Privilege: Legislative Privilege. Contains "information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to" prepare Wisconsin Acts 43 and 44; "information concerning the identities of persons who participated in decisions regarding" the preparation of Wisconsin Acts 43 and 44; and information amounting to "opinions, recommendations or advice." *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

2. July 7, 2011, email correspondence between Legislative Staff Member Adam Foltz and Legislative Staff Member Tad Ottman regarding area alternatives.



Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

3. July 18, 2011, email exchange between Legislative Staff Member Adam Foltz and Legislative Staff Member Tad Ottman regarding potential amendment to Act 43.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

4. July 11, 2011, email exchange between Legislative Staff Member Adam Foltz and Legislative Staff Member Tad Ottman regarding Hispanic population heat map.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

5. July 9, 2011, email exchange between Legislative Staff Member Adam Foltz and State Representative and Legislative Staff Member Tad Ottman regarding Hispanic district alternatives.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

6. March 1, 2011, email exchange between Legislative Staff Member Adam Foltz and Legislative Staff Member Tad Ottman regarding election data.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

7. Documents used during meetings between Legislative Staff Member Adam Foltz and State Representatives, including memoranda analyzing population changes of each district enumerated in the 2010 census, maps illustrating the analysis of the district population changes over the decade, maps confirming the physical location of members' residence, and new district analysis.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

8. Political analysis of draft/final maps compared to current districts.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

9. Demographic analysis of minority population trends/proportionality.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

10. Spreadsheets analyzing census and election data.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare

Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

11. Maps incorporating census and elections data.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

12. Draft maps prepared by Legislative Staff Member Adam Foltz.

Grounds for Privilege: Legislative Privilege. Contains “information concerning the motives, objectives, plans, reports and/or procedures used by lawmakers to” prepare Wisconsin Acts 43 and 44; “information concerning the identities of persons who participated in decisions regarding” the preparation of Wisconsin Acts 43 and 44; and information amounting to “opinions, recommendations or advice.” *Comm. For a Fair and Balanced Map v. Ill. State Bd. Of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656 (N.D. Ill. Oct. 12, 2011) * 32-34.

Dated this 21st day of December, 2011.

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**2011 - 2012 LEGISLATURE
STATISTICS AND MAPS**

SB 148

MEMO 1

POPULATION

<u>District</u>	<u>Population</u>	<u>Deviation</u>	<u>Pct. Dev.</u>	<u>Minority Population</u>	
				<u>Hispanic</u>	<u>Other</u>
Sen. Dist. 1	172,313	-20	-0.01	4,148	5,897
Asm. Dist. 1	57,220	-224	-0.39	1,239	1,214
Asm. Dist. 2	57,649	205	0.36	1,084	2,183
Asm. Dist. 3	57,444	0	0.00	1,825	2,500
Sen. Dist. 2	172,461	128	0.07	4,341	14,071
Asm. Dist. 4	57,486	42	0.07	1,675	5,335
Asm. Dist. 5	57,470	26	0.04	1,247	4,611
Asm. Dist. 6	57,505	61	0.11	1,419	4,125
Sen. Dist. 3	171,977	-356	-0.21	81,772	20,234
Asm. Dist. 7	57,498	54	0.09	9,375	6,059
Asm. Dist. 8	57,246	-198	-0.35	35,971	6,770
Asm. Dist. 9	57,233	-211	-0.37	36,426	7,405
Sen. Dist. 4	172,425	92	0.05	7,421	119,413
Asm. Dist. 10	57,428	-16	-0.03	2,515	39,538
Asm. Dist. 11	57,503	59	0.10	2,080	42,879
Asm. Dist. 12	57,494	50	0.09	2,826	36,996
Sen. Dist. 5	172,421	88	0.05	7,268	14,831
Asm. Dist. 13	57,452	8	0.01	2,623	4,929
Asm. Dist. 14	57,597	153	0.27	1,448	5,472
Asm. Dist. 15	57,372	-72	-0.13	3,197	4,430
Sen. Dist. 6	172,292	-41	-0.02	8,496	123,437
Asm. Dist. 16	57,458	14	0.02	2,818	41,812
Asm. Dist. 17	57,354	-90	-0.16	2,323	40,227
Asm. Dist. 18	57,480	36	0.06	3,355	41,398
Sen. Dist. 7	172,423	90	0.05	14,136	14,888
Asm. Dist. 19	57,546	102	0.18	3,220	6,566
Asm. Dist. 20	57,428	-16	-0.03	6,551	3,795
Asm. Dist. 21	57,449	5	0.01	4,365	4,527
Sen. Dist. 8	172,356	23	0.01	4,147	17,735
Asm. Dist. 22	57,495	51	0.09	1,215	5,978
Asm. Dist. 23	57,579	135	0.23	1,348	3,576
Asm. Dist. 24	57,282	-162	-0.28	1,584	8,181
Sen. Dist. 9	172,439	106	0.06	8,745	11,097
Asm. Dist. 25	57,322	-122	-0.21	2,300	2,964
Asm. Dist. 26	57,581	137	0.24	4,187	4,867
Asm. Dist. 27	57,536	92	0.16	2,258	3,266
Sen. Dist. 10	172,245	-88	-0.05	3,017	6,294
Asm. Dist. 28	57,467	23	0.04	944	1,624
Asm. Dist. 29	57,537	93	0.16	961	2,482
Asm. Dist. 30	57,241	-203	-0.35	1,112	2,188



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Appendix to: SB-148 LRB-2266/1rd
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<u>District</u>	<u>Population</u>	<u>Deviation</u>	<u>Pct. Dev.</u>	<u>Minority Population</u>	
				<u>Hispanic</u>	<u>Other</u>
Sen. Dist. 11	172,329	-4	0.00	14,420	5,330
Asm. Dist. 31	57,240	-204	-0.36	4,770	2,532
Asm. Dist. 32	57,524	80	0.14	6,509	1,564
Asm. Dist. 33	57,565	121	0.21	3,141	1,234
Sen. Dist. 12	172,381	48	0.03	2,395	9,404
Asm. Dist. 34	57,387	-57	-0.10	608	1,644
Asm. Dist. 35	57,562	118	0.20	866	1,526
Asm. Dist. 36	57,432	-12	-0.02	921	6,234
Sen. Dist. 13	172,387	54	0.03	7,575	4,528
Asm. Dist. 37	57,507	63	0.11	2,928	1,716
Asm. Dist. 38	57,493	49	0.08	2,103	1,479
Asm. Dist. 39	57,387	-57	-0.10	2,544	1,333
Sen. Dist. 14	171,988	-345	-0.20	5,590	5,120
Asm. Dist. 40	57,366	-78	-0.14	1,489	1,403
Asm. Dist. 41	57,337	-107	-0.19	2,772	2,010
Asm. Dist. 42	57,285	-159	-0.28	1,329	1,707
Sen. Dist. 15	172,496	163	0.09	12,515	12,306
Asm. Dist. 43	57,443	-1	0.00	2,847	1,980
Asm. Dist. 44	57,395	-49	-0.09	3,274	3,421
Asm. Dist. 45	57,658	214	0.37	6,394	6,905
Sen. Dist. 16	172,429	96	0.06	13,572	22,847
Asm. Dist. 46	57,458	14	0.02	1,866	5,082
Asm. Dist. 47	57,465	21	0.04	7,110	7,806
Asm. Dist. 48	57,506	62	0.11	4,596	9,959
Sen. Dist. 17	172,550	217	0.13	3,650	4,416
Asm. Dist. 49	57,346	-98	-0.17	707	1,333
Asm. Dist. 50	57,624	180	0.31	1,453	2,057
Asm. Dist. 51	57,580	136	0.24	1,490	1,026
Sen. Dist. 18	171,722	-611	-0.35	5,802	11,043
Asm. Dist. 52	57,232	-212	-0.37	3,025	2,956
Asm. Dist. 53	57,240	-204	-0.36	1,172	4,405
Asm. Dist. 54	57,250	-194	-0.34	1,605	3,682
Sen. Dist. 19	172,576	243	0.14	7,745	11,260
Asm. Dist. 55	57,493	49	0.08	2,408	2,913
Asm. Dist. 56	57,582	138	0.24	1,574	3,598
Asm. Dist. 57	57,501	57	0.10	3,763	4,749
Sen. Dist. 20	172,003	-330	-0.19	4,391	4,858
Asm. Dist. 58	57,227	-217	-0.38	1,657	1,633
Asm. Dist. 59	57,391	-53	-0.09	1,492	1,690
Asm. Dist. 60	57,385	-59	-0.10	1,242	1,535

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Appendix to: SB-148 LRB-2266/1rd
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<u>District</u>	<u>Population</u>	<u>Deviation</u>	<u>Pct. Dev.</u>	<u>Minority Population</u>	
				<u>Hispanic</u>	<u>Other</u>
Sen. Dist. 21	172,324	-9	-0.01	10,039	10,975
Asm. Dist. 61	57,614	170	0.30	2,965	2,024
Asm. Dist. 62	57,345	-99	-0.17	3,765	4,789
Asm. Dist. 63	57,365	-79	-0.14	3,309	4,162
Sen. Dist. 22	172,270	-63	-0.04	31,642	33,101
Asm. Dist. 64	57,270	-174	-0.30	6,430	7,668
Asm. Dist. 65	57,455	11	0.02	11,277	8,861
Asm. Dist. 66	57,545	101	0.18	13,935	16,572
Sen. Dist. 23	172,149	-184	-0.11	3,721	5,456
Asm. Dist. 67	57,239	-205	-0.36	668	1,515
Asm. Dist. 68	57,261	-183	-0.32	866	2,540
Asm. Dist. 69	57,649	205	0.36	2,187	1,401
Sen. Dist. 24	172,520	187	0.11	5,337	7,321
Asm. Dist. 70	57,552	108	0.19	1,630	2,280
Asm. Dist. 71	57,519	75	0.13	1,489	3,008
Asm. Dist. 72	57,449	5	0.01	2,218	2,033
Sen. Dist. 25	172,409	76	0.04	2,432	12,490
Asm. Dist. 73	57,453	9	0.02	684	3,743
Asm. Dist. 74	57,494	50	0.09	749	6,945
Asm. Dist. 75	57,462	18	0.03	999	1,802
Sen. Dist. 26	172,596	263	0.15	10,919	30,067
Asm. Dist. 76	57,617	173	0.30	2,656	7,837
Asm. Dist. 77	57,433	-11	-0.02	4,884	11,921
Asm. Dist. 78	57,546	102	0.18	3,379	10,309
Sen. Dist. 27	172,449	116	0.07	5,312	7,679
Asm. Dist. 79	57,461	17	0.03	1,860	3,270
Asm. Dist. 80	57,585	141	0.24	1,228	2,191
Asm. Dist. 81	57,403	-41	-0.07	2,224	2,218
Sen. Dist. 28	172,218	-115	-0.07	8,445	10,950
Asm. Dist. 82	57,430	-14	-0.02	2,988	5,884
Asm. Dist. 83	57,423	-21	-0.04	1,484	1,391
Asm. Dist. 84	57,365	-79	-0.14	3,973	3,675
Sen. Dist. 29	172,292	-41	-0.02	3,243	13,637
Asm. Dist. 85	57,480	36	0.06	1,459	6,701
Asm. Dist. 86	57,454	10	0.02	909	3,011
Asm. Dist. 87	57,358	-86	-0.15	875	3,925
Sen. Dist. 30	172,798	465	0.27	15,722	14,758
Asm. Dist. 88	57,556	112	0.19	4,733	4,199
Asm. Dist. 89	57,634	190	0.33	899	1,714
Asm. Dist. 90	57,608	164	0.28	10,090	8,845

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Appendix to: SB-148 LRB-2266/1rd
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<u>District</u>	<u>Population</u>	<u>Deviation</u>	<u>Pct. Dev.</u>	<u>Minority Population</u>	
				<u>Hispanic</u>	<u>Other</u>
Sen. Dist. 31	172,338	5	0.00	4,326	8,251
Asm. Dist. 91	57,359	-85	-0.15	1,132	4,283
Asm. Dist. 92	57,431	-13	-0.02	2,354	2,405
Asm. Dist. 93	57,548	104	0.18	840	1,563
Sen. Dist. 32	172,122	-211	-0.12	2,755	9,686
Asm. Dist. 94	57,266	-178	-0.31	670	3,333
Asm. Dist. 95	57,372	-72	-0.13	1,071	5,147
Asm. Dist. 96	57,484	40	0.07	1,014	1,206
Sen. Dist. 33	172,288	-45	-0.03	11,017	9,139
Asm. Dist. 97	57,279	-165	-0.29	6,522	3,373
Asm. Dist. 98	57,513	69	0.12	3,230	3,929
Asm. Dist. 99	57,496	52	0.09	1,265	1,837
TOTAL	5,686,986			336,056	612,519

ASSEMBLY

	Persons	Percent
Mean Deviation:	93	0.16
Largest Positive Deviation:	214	0.37
Largest Negative Deviation:	-224	-0.39
Overall Range in Deviation:	± 438	± 0.76

SENATE

	Persons	Percent
Mean Deviation:	149	0.09
Largest Positive Deviation:	466	0.27
Largest Negative Deviation:	-610	-0.35
Overall Range in Deviation:	± 1,076	± 0.62

SB 148

Memorandum

MEMO 2

Date: 7/13/2011

Re: SB 148 - Memorandum

Municipal Splits

Senate Bill 148: Senate
MCD's: 38

Senate Bill 148: Assembly
MCD's: 62

Court Map 2002: Assembly

MCD's: 50

SB 148

Memorandum

MEMO 3

Date: 7/13/2011

Re: SB 148 - Memorandum

Milwaukee County Population Trends and Racial Composition

Milwaukee County Growth				
	2000	2010	Growth	% Growth
Total Population	940,164	947,735	7,571	0.81%
African American	233,013	257,579	24,566	10.54%
Hispanic	82,406	126,039	43,633	52.95%
	2000	2010	Growth	% Growth
Voting Age Population	692,339	711,358	19,019	2.75%
African American VAP	140,790	168,280	27,490	19.53%
Hispanic VAP	49,981	77,116	27,135	54.29%

City of Milwaukee Growth				
	2000	2010	Growth	% Growth
Total Population	596,974	594,833	(2,141)	-0.36%
African American	224,050	239,920	15,870	7.08%
Hispanic	71,646	103,007	31,361	43.77%
	2000	2010	Growth	% Growth
Voting Age Population	425990	433486	7,496	1.76%
African American VAP	134563	156151	21,588	16.04%
Hispanic VAP	43473	63206	19,733	45.39%

Memorandum

Date: 7/13/2011

Re: SB 148 - Memorandum

Majority-Minority District Summary

African American Assembly Districts			
	2002 Court Map - BVAP	Census Day 2010 - BVAP	SB 148 - BVAP
10	67.08%	67.43%	61.79%
11	62.85%	75.84%	61.94%
12	32.77%	48.99%	51.48%
16	60.45%	55.87%	61.34%
17	61.88%	74.11%	61.33%
18	56.70%	58.85%	60.43%

Hispanic Assembly Districts					
	2002 Court Map - HVAP	Census Day 2010 - HVAP	SB 148 - HVAP	Amendment 1 - HVAP	Amendment 2 - HVAP
8	58.34%	65.50%	57.24%	64.00%	60.50%
9	22.94%	46.18%	57.25%	50.60%	54.00%

SB 148

MEMO 4

Memorandum

Date: 7/13/2011

Re: SB 148 - Memorandum

Voting Age Populations

SB 148: Assembly DISTRICT	black18pct	hispanic18pct
8	6.78%	57.24%
9	6.91%	57.25%
10	61.79%	3.73%
11	61.94%	3.04%
12	51.48%	4.17%
16	61.34%	4.65%
17	61.33%	3.43%
18	60.43%	5.36%

Senate District		
3		40.8%
4	58.4%	
6	61.0%	

Amendment 1 (a1388/1):	
AD 8:	64.0%
AD 9:	50.6%
Amendment 2 (a1394/1):	
AD 8:	60.5%
AD 9:	54.0%

SB 148

MEMO 5

July 13, 2011

Court Map 2002

SENATE DISTRICT	BVAP	HVAP
08		58.34%
09		22.94%
10	67.08%	
11	62.85%	
12	32.77%	
16	60.45%	
17	61.88%	
18	56.70%	

Senate District (approximate)	BVAP	HVAP
3		28.5%
4	54.2%	
6	59.6%	

171

SB 148

Memorandum

MEMO 6

Date: 7/13/2011

Re: SB 148 - Memorandum

Population

Milwaukee Population shifts (comparison to ideal population)

AD 10: -6,025

AD 11: -5,266

AD 12: -2,196

AD 16: -4,934

AD 17: -5,583

AD 18: -9,057

AD 7: -1,619

AD 8: -2,828

AD 9: 3,436

SD 4: -13,481

SD 6: -19,575

SD 3: -1,012

Memorandum

SB 148

MEMO 7

Date: 7/13/2011

Re: SB 148 - Memorandum

Pairings Summary

AD 7 Krusick/Zepnick

AD 92 Danou/Radcliffe

AD 22 Ott/Pasch

AD 60 Pridemore/Kessler

AD 61 Kerkman/Steinbrink

AD 14 Kooyenga/Cullen

AD 33 Nass/Jorgenson

AD 31 August/Loudenbeck

AD 88 Klenke/Jacque

AD 89 Van Roy/Nygren

SD 21 Wanggaard/Wirch

* 10 Dems, 12 GOP Paired

HISPANICS  LEADERSHIP

Good Morning,

My name is Zeus Rodriguez, I live in Milwaukee County. I am here as a liaison for a coalition of individual Hispanic business owners, educators and community advocates. We do not speak on behalf of the entire Hispanic community, but our group of Wisconsin residents are both politically active and concerned with the governing process.

I personally wish that there was more time given to this process. In my efforts to engage the Hispanic Community, it was difficult to educate so many people in such a short period of time. As a result, we are only going to speak and endorse the new state map as it pertains to the 3rd Senate district and only the 3rd Senate district. As you know that this district is at the heart of the Latino community in Wisconsin and it is imperative that proper political representation is achieved there.

That being said, despite the quick nature of this process, the lines that were drawn in the 3rd district seems to have been done with the careful intention of giving the Hispanic community of Milwaukee full political representation and we support the 2nd Amendment to the plan. 60% HVAP in District 8 and a 54% HVAP in District 9, as well as the original proposal of a 40% HVAP for the 3rd Senate District.

UNLESS THE LATTER STATISTIC CAN BE IMPROVED.
— A HIGHER HVAP IN THE 3rd SENATE DISTRICT.

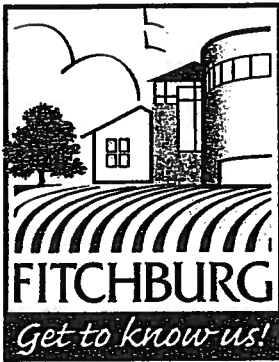
HISPANICS LEADERSHIP

The following is a bipartisan list of individual Hispanic Business owners, Educators and Community Advocates who are in support of a 60% HVAP 8th District and 54% HVAP 9th District as well as the 40% HVAP currently proposed for the 3rd Senate District.

Teresa C. Mercado, Executive Director, Mexican Fiesta
Daisy Cubias, City of Milwaukee - Retired
Ernesto Villareal, El Rey Food Stores- Founder/Owner
Ramon Cruz, St. Anthony School - Principal
Victor Huyke, El Conquistador - Owner/Publisher
Raul Huertas, Hispanic Entrepreneurs of Wisconsin - President
Julio Maldonado, Hispanic Entrepreneurs of Wisconsin - Vice President
Gregorio Montoto, Mexican Fiesta - Vice President
Martha Manske, Hispanic Entrepreneurs of Wisconsin
Anselmo Villarreal, La Casa de Esperanza - President/CEO
Zeus Rodriguez, Hispanics for School Choice - President
Juan M. Carrasquillo, Director - Administrative Services We Energies
Jose Delgado, American Transmission Company, LLC Chairman - President/CEO - Retired
Aaron Rodriguez, El Conquistador - Columnist
Ivan Gamboa, Tri-City National Bank - Vice President
Karla Huerta, representing LULAC Council 322, Milwaukee
Jose Zarate, Owner of La Fuente Restaurant
Bill Sandoval, Vice President of the Wisconsin Soccer Association
Luis Barboza, Architect, Milwaukee
Ernesto Baca, UMOS
Abel Ortiz, SER (Service employment redevelopment)
Ruben Burgos, Lieutenant, MPD and president of LPOA (Latino Police Officers Association)
Valdemar Escobar, Owner of Fiesta Garibaldi restaurants
Dr. Arturo Martinez, Associate Dean MATC representing LULAC Council 319 Milwaukee

Other Wisconsin residents who have supported our efforts but have not had a chance to consider the new 3rd Senate District and haven't endorsed it at this time.

Agustin A. Ramirez, HUSCO International - Chairman/CEO
Dagoberto Ibarra, Latinos United for Political Action - President
Francisco Sanchez, Hispanic Entrepreneurs of Wisconsin
Philippe Castro, Hispanic Entrepreneurs of Wisconsin
Professor Javier Tapia, UWM Professor - Hispanic Studies
Robert Serrano, Martial Arts America - President
Dr. Gerardo Caballero MD, General Surgeon - Milwaukee
Rev. Javier Bustos, Sacred Heart School of Theology, MA Program, Director
Ricardo Trinidad, Telecom & Data Inc. - CEO



CITY OF FITCHBURG

Office of the Mayor

5520 Lacy Road
Fitchburg, WI 53711-5318

Phone: (608) 270-4200 ■ Fax: (608) 270-4212

www.city.fitchburg.wi.us

TO: Wisconsin State Lawmakers
FROM: Mayor Shawn Pfaff
DATE: July 13, 2011
SUBJECT: LRB – 2296 Amendment

The City of Fitchburg, with a diverse population of 25,260 persons and located within three school districts, is requesting that the Legislature consider amending the proposed Redistricting Bill LRB-2296 to allow communities with multiple school districts to be able to create wards with a minimum population of 300.

The City, over the past two months, has been diligently reviewing different ward boundary scenarios that take into account minority representation (35% of the City population is minority), school district boundaries (Verona, Oregon, and Madison Metropolitan), similar neighborhood interests and future development areas. The example that the City Ad-Hoc Redistricting Committee presented to the Common Council last night takes into account all of these goals, in addition to creating two out of four Aldermanic Districts where minority representation would be the majority.

The proposed Legislative Boundary Map, which splits the City of Fitchburg into two State Senate and State Assembly districts, alters the City's proposed Ward Map drastically. The City will now be disadvantaged in trying to create wards that are split between the two county supervisory districts, three school districts and two legislative districts.

City of Fitchburg 2010 Census Blocks Total Population with School Districts

City Population - 25,260


Legend


 Fitchburg Census Blocks

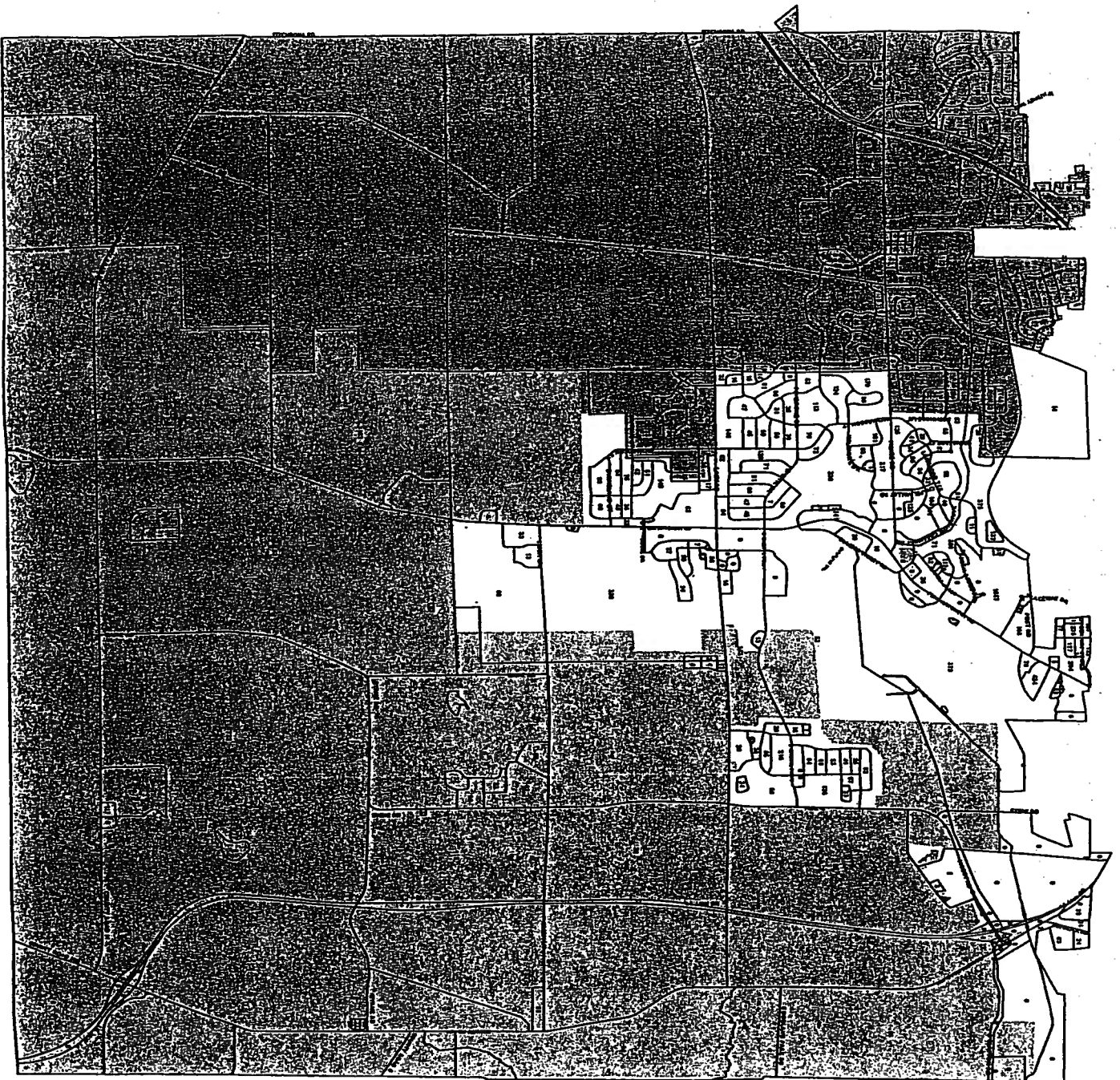
Total Population in each
Census Block

School Districts

Madison Metro

 Oregon

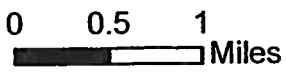
 Verona



Source: U.S. Census Bureau, 2010
City of Fitchburg
Created: May 25, 2011

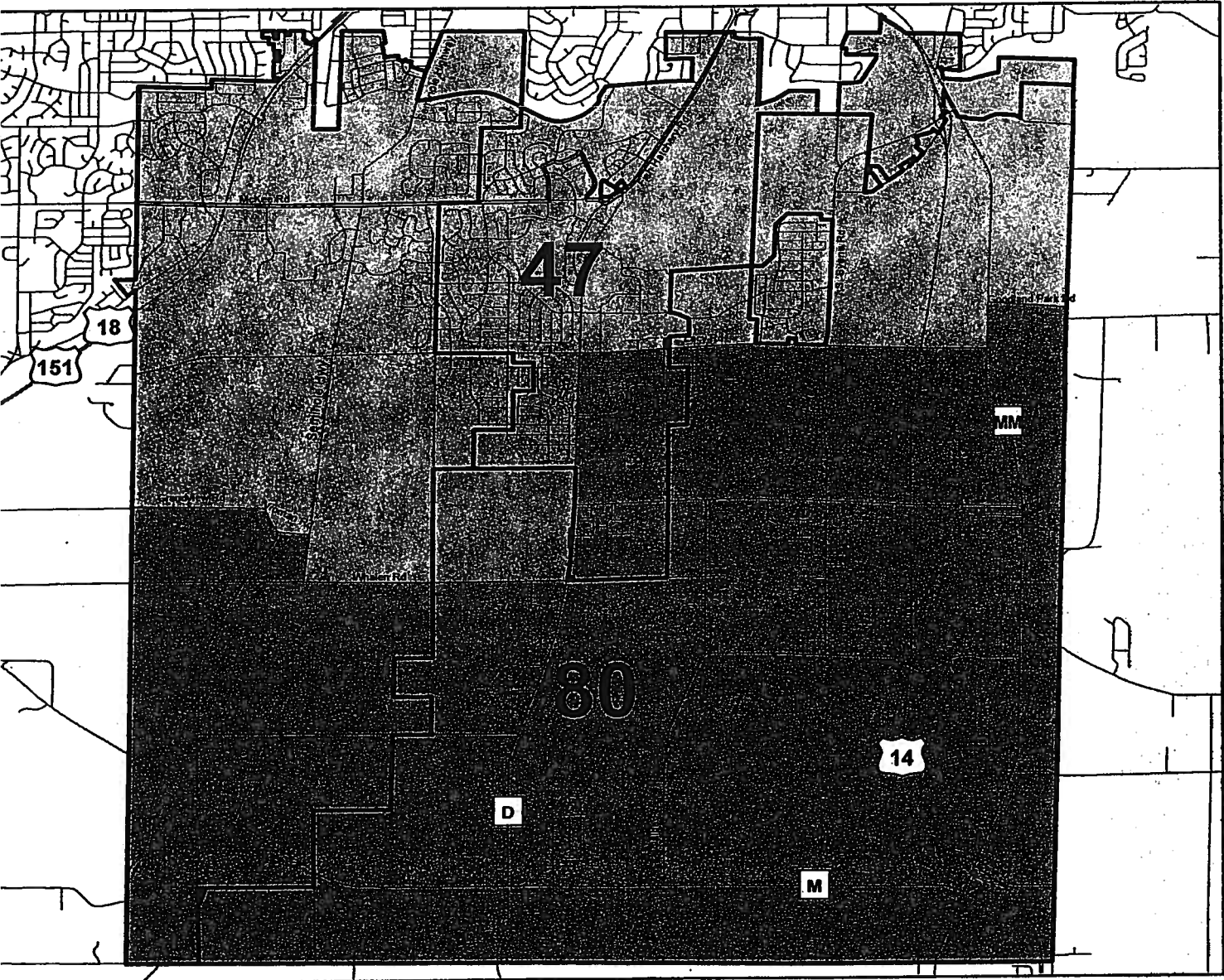
Proposed State Assembly Boundary

Legend
 — County Supervisory
 □ School District Boundary



July 2011

Prepared by:
 City of Fitchburg
 Sources:
 U.S. Census Bureau, 2010
 City of Fitchburg



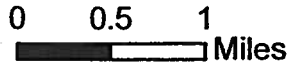
Proposed State Assembly	Total Population	White	Minority Total Population	Breakdown of Minority							Over 18
				Black	Hispanic	Asian	American Indian	Pacific Island	Other	OtherMLT	
47	21,686	13,639	8,047	2,380	4,197	1,247	88	10	27	98	16,074
80	3,574	2,816	758	472	144	106	22	4	1	9	3,000
Total	25,260	16,455	8,805	2,852	4,341	1,353	110	14	28	107	19,074

Proposed State Senate Boundary



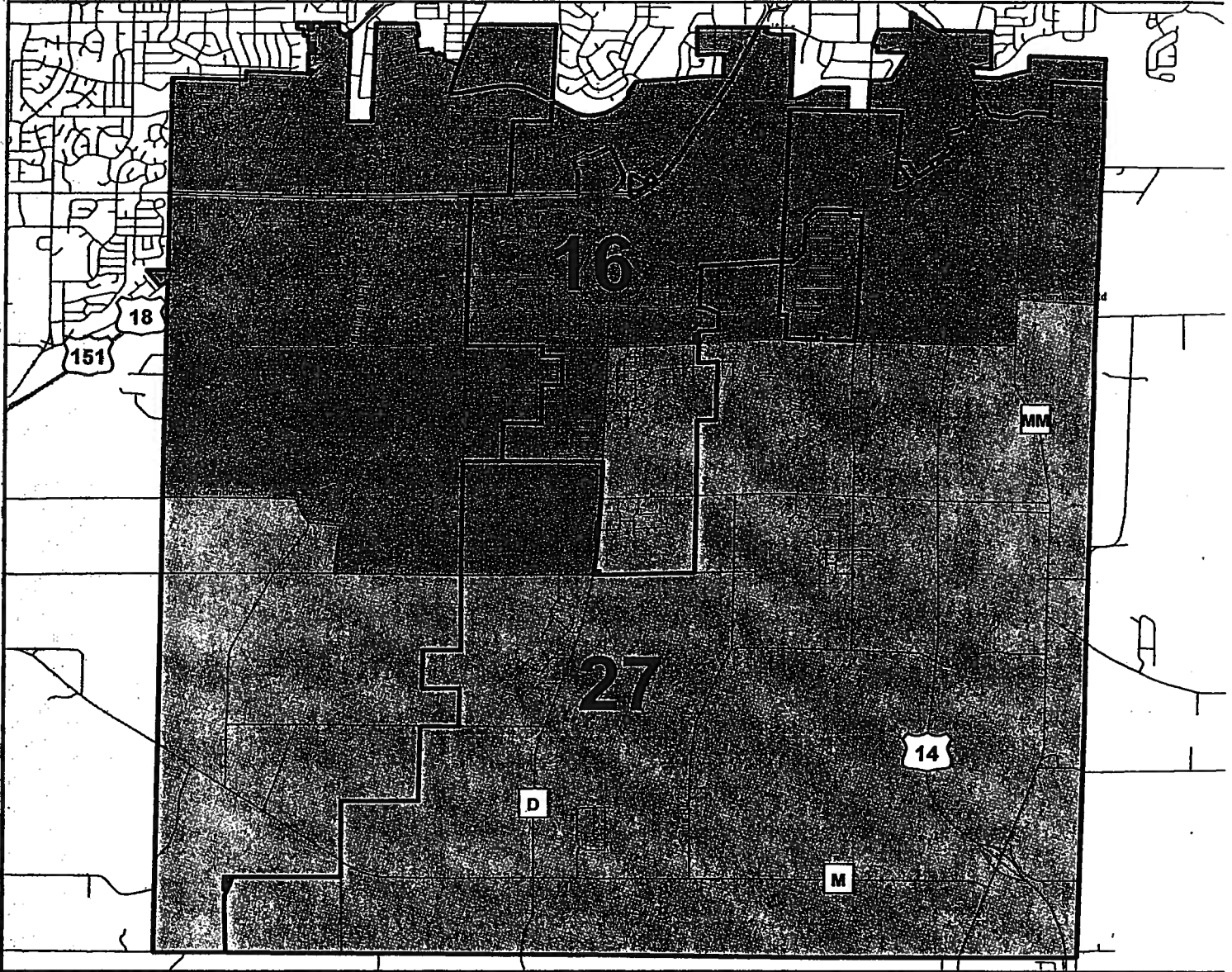
Legend

- County Supervisory
- School District Boundary



July 2011

Prepared by:
City of Fitchburg
Sources:
U.S. Census Bureau, 2010
City of Fitchburg



Proposed State Senate	Total Population	White	Minority Total Population	Breakdown of Minority							Over 18
				Black	Hispanic	Asian	American Indian	Pacific Island	Other	OtherMLT	
16	21,686	13,639	8,047	2,380	4,197	1,247	88	10	27	98	16,074
27	3,574	2,816	758	472	144	106	22	4	1	9	3,000
Total	25,260	16,455	8,805	2,852	4,341	1,353	110	14	28	107	19,074

Doug Mering
Group Representing – Individual Voter
1605 Kieth Street
Baraboo, WI 54913
Ph 1-608-434-7968

July 13, 2011

Subject: Testimony on Redistricting LRB 2265/2, 2266/1 and 2296/1

I am Doug Mering from Baraboo and I am representing myself and hopefully many other moderate voters of this state who are feeling more and more disenfranchised by the political atmosphere in the state of Wisconsin. I am just as competitive as the next person but Wisconsin's designation as the most polarized political state in the United States is not something that I and many other Wisconsinites are proud of.

In the past I have voted for both Democrats and Republicans and never have voted by just the party label but have always looked at who is the best person to advance and move Wisconsin Forward. It is unfortunate that this redistricting plan which is setup in a partisan fashion will further alienate the voters of this state. It is a disservice to the people of this state where districts such as the ones outlined in this plan create these Supersafe zones for both Democrats and Republicans alike. Because of these Supersafe zones we will have politicians who will unfortunately not be truly beholden to their constituents' needs but will do what they please because it will be next to impossible to be voted out of office.

Wisconsinites have elected you to represent the best interests of the state and in this case the voters of the state. That means doing something odd in Madison which is to reach across the aisle and work with the other party. We cannot keep getting beaten out by Iowa who has a great nonpartisan redistricting process and expect positive governance outcomes for its citizens. It is my hope that you as our legislative leaders will reject Senate Bills LRB 2265/2, 2266/1 and 2296/1 and adopt Assembly Bill 198 which is a nonpartisan process that is fair, makes sense and is in the best interest of the voters of Wisconsin.



210 N. Bassett St., Suite 215 / Madison, WI 53703 / 608 255-4260 / www.wisdc.org

Testimony of the Wisconsin Democracy Campaign

Joint Public Hearing on Redistricting Assembly Committee on Homeland Security and State Affairs Senate Committee on Judiciary, Utilities, Commerce and Government Operations

July 13, 2011

In a democracy voters are supposed to choose their representatives, not the other way around. The redistricting plans that are the subject of this hearing are a disgusting affront to this bedrock principle of democracy. The plans for new congressional and state legislative districts that were drawn at great expense to taxpayers but yet kept secret until last Friday afternoon are a Republican gerrymander, pure and simple.

The mere fact that we are here today instead of weeks or even months from now as would have been customary – caused by the majority's decision to jump the gun on state legislative redistricting – is a disgusting affront to local control.

The Wisconsin legislature is, by law, barred from drawing legislative district lines until after local governments have drawn lines for aldermanic and county board districts. There is a reason for this law. It ensures that legislative districts are respectful of local boundaries. That way, communities are not sliced up for partisan purposes and citizens with shared history and shared needs living in close proximity to one another can be grouped in districts designed to make sure their interests are represented.

The redistricting plan you are considering ignores longstanding practice and changes the law to accommodate early state redistricting. There is only one conceivable reason for doing so, and that is to complete legislative redistricting before recall elections in the coming weeks that could shift control of the senate to the Democrats. This politically inspired maneuver is unprecedented in our state's history. Hundreds of hours of work already done by local government officials around the state will have been a waste of time, as they will be forced to start their work over. This will end up costing local taxpayers hundreds of thousands of dollars. It is not lost on anyone that this waste of taxpayer money to advance purely partisan political aims comes at a time when Wisconsinites have been told repeatedly that the state is broke.

Yesterday we put forward citizen-designed maps of new state assembly and senate districts in response to the gerrymandered redistricting plan you are considering. Our plan creates a large number of toss-up districts that could be won by either Republicans or Democrats. Based on how Wisconsin voters cast

their ballots in 2008 – a strong Democratic year – and 2010 – a strong Republican year, 80 of the 132 assembly and senate districts under our plan have partisan splits of 10 percentage points or less.

That is impressive considering that over the last decade, the largest number of competitive legislative elections Wisconsin has seen is 29, and there have been as few as 10 races decided by 10 percentage points or less. When districts are drawn to account for population changes without deliberately trying to create Democratic or Republican districts, the result will be greater electoral competition and more leverage for voters, yielding improved representation.

The maps we've drawn provide an inkling of what would happen if redistricting were turned over to a nonpartisan authority as proposed in Assembly Bill 198.

One telltale sign that the redistricting plan under consideration today was drawn to gain political advantage for Republicans who control both houses is the fact that several Democratic candidates running in the senate recall elections this summer are drawn out of the districts they may be elected to represent. It is not necessary to draw candidates like Fred Clark, Nancy Nusbaum and Bob Wirsch out of their districts. Districts can easily be drawn that account for population changes without pulling such stunts.

The plan you are considering also unnecessarily splits communities like the city of Sheboygan, while our plan does not. You need to have a really good reason to divide a community. Sometimes it's unavoidable. In Sheboygan's case, it was not difficult to draw districts that kept the city intact. The only reason for splitting it is a crassly political one.

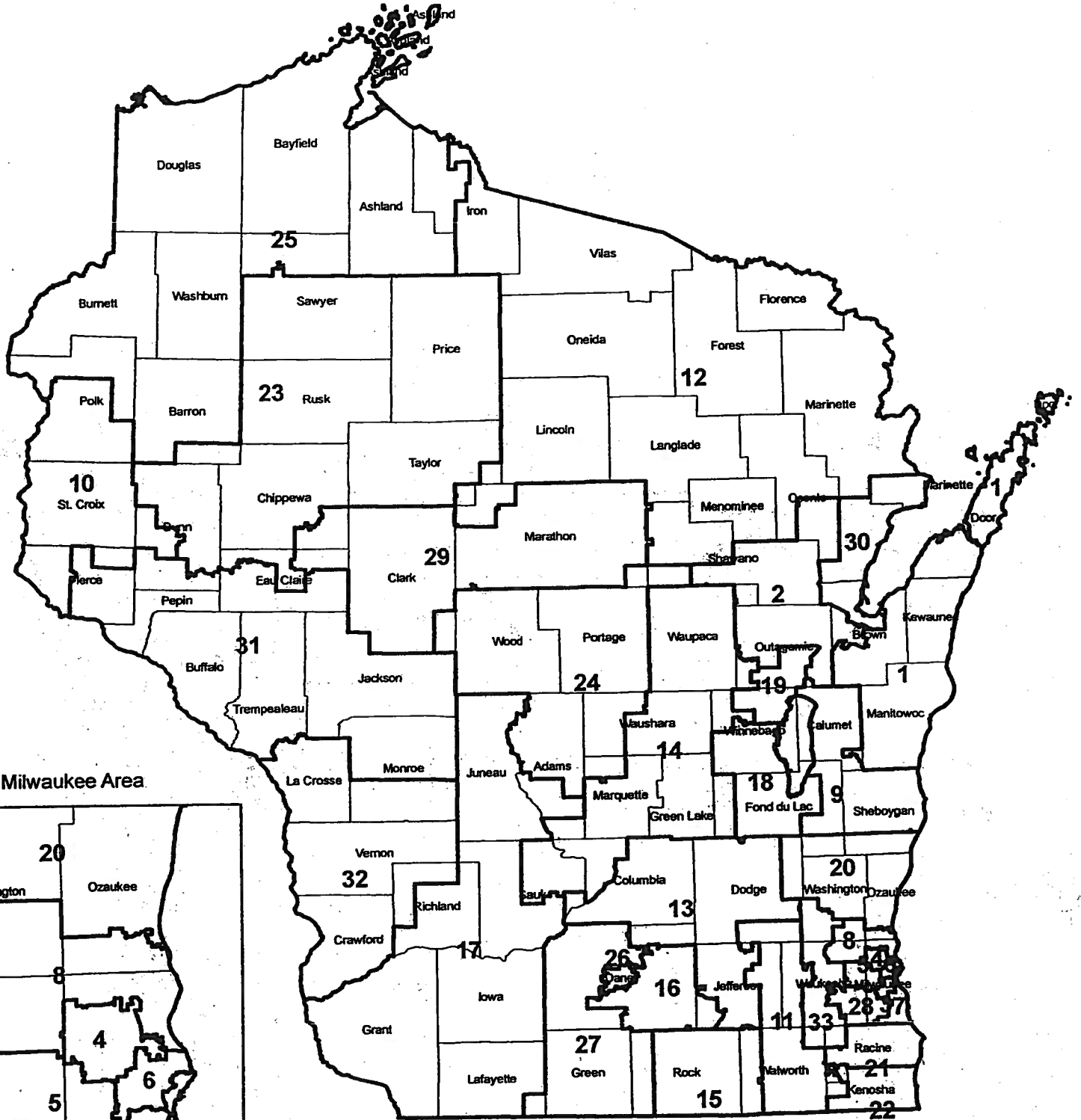
Another example can be found in the southeastern corner of the state. Our plan keeps separate senate districts for Racine and Kenosha counties, while the plan you have before you gerrymanders the region for political purposes, merging the cities of Kenosha and Racine into one district and the outlying areas of Racine and Kenosha counties into another.

This not only gains Republicans some political advantage in that area of the state, but even more importantly it disadvantages voters by greatly diminishing electoral competitiveness there. The way you have drawn the lines, we won't see a district anymore like the one once represented by Republican George Petak, who was defeated by Democrat Kim Plache, who voters then replaced with Republican Cathy Stepp, who in turn was succeeded by Democrat John Lehman who eventually was defeated by Republican Van Wangaard.

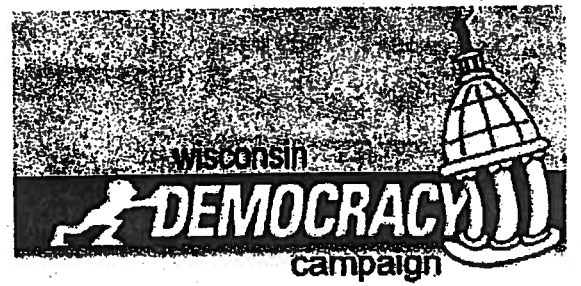
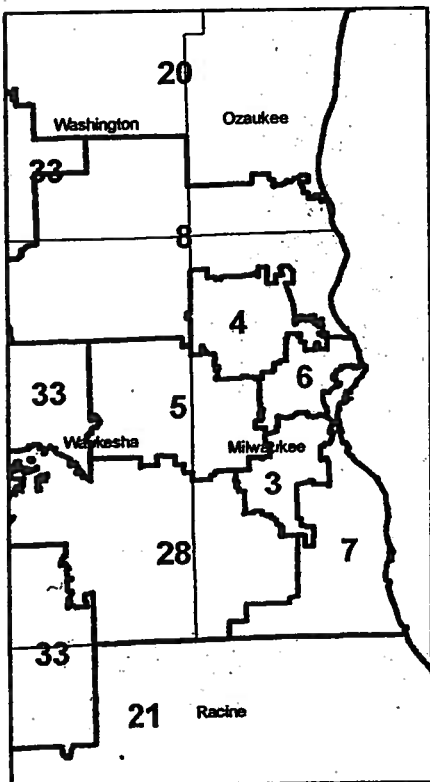
These are just a few illustrations of the blatantly political nature of your redistricting plan that stuck out like sore thumbs. Many others were readily apparent to us. And if members of the public were given sufficient time to carefully review your proposed plan, many more such examples undoubtedly would be found.

What you are fixing to do is nothing but a power grab and one that will dishonor Wisconsin. Holding hearings without any intention of listening disgraces our state too. You should be ashamed of yourselves.

Wisconsin Democracy Campaign Alternative Wisconsin Senate Redistricting Map

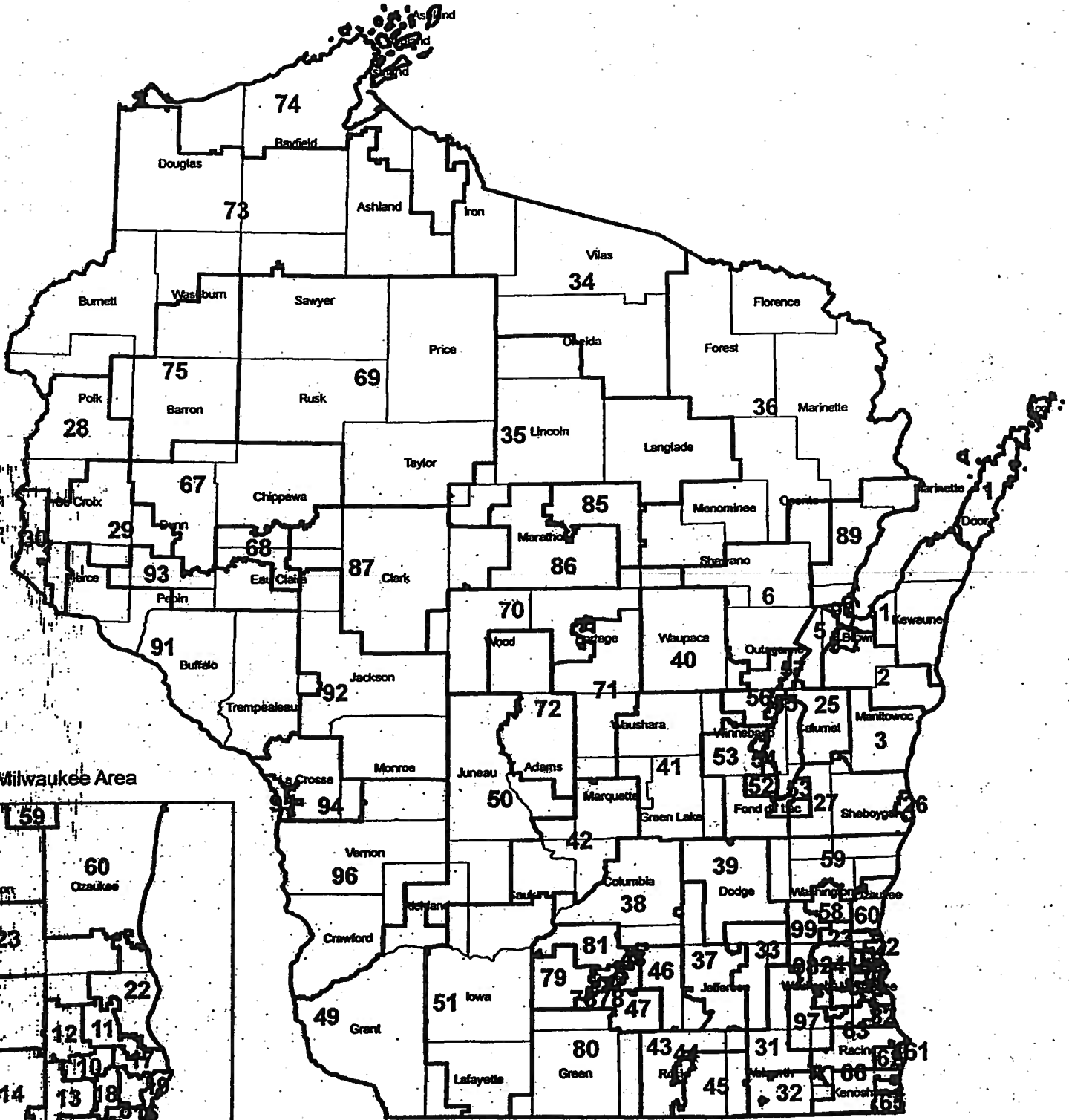


Milwaukee Area

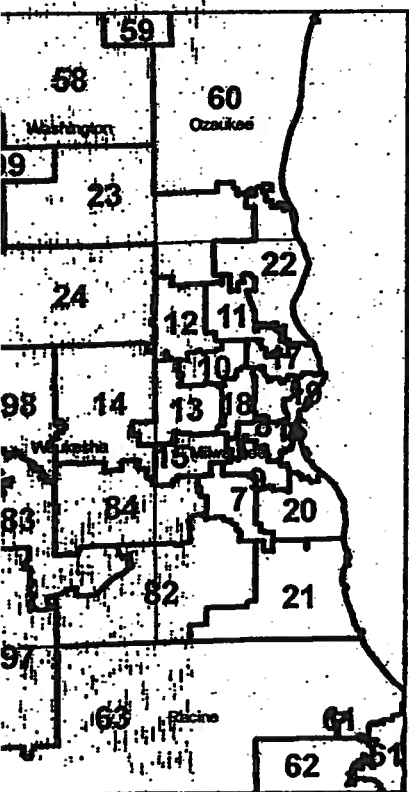


Wisconsin Democracy Campaign

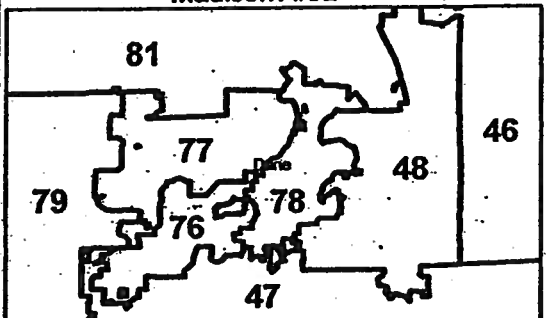
Alternative Wisconsin Assembly Redistricting Map



Milwaukee Area



Madison Area





**LEAGUE OF WOMEN VOTERS® OF WISCONSIN
EDUCATION FUND**

612 W. Main Street, #200
Madison, WI 53703
<http://www.lwwwi.org>

Phone: (608) 256-0827
lwwwisconsin@lwwwi.org

July 13, 2011

To: Assembly Committee on Homeland Security and State Affairs
Senate Committee on Judiciary, Utilities, Commerce and Government Operations

From: Andrea Kaminski, Executive Director, League of Women Voters of Wisconsin Education Fund

Re: Opposition to SB148, SB149 and SB150

Each decade the new census data are used to draw up new voting districts to equitably distribute political representation as our population changes. In Wisconsin this task is delegated to the state legislature, which time and again has proven it is unable to complete the task at a reasonable cost and free from private interest and partisan manipulation. Ever concerned with equal representation and electoral integrity, the League of Women Voters regularly devotes much attention to reapportionment and redistricting. As a nonpartisan citizen organization, the League represents no special interest but the general well-being and political representation of the people of the State of Wisconsin.

As in decades past, state and local League activities in Wisconsin in the past 18 months have included monitoring the redistricting process, testifying before local redistricting bodies, supporting reform legislation, sponsoring public forums around the state, and working with other groups to shine a light on the redistricting process. There are League members serving on county redistricting committees, and two League members recently filed a petition in Brown County Circuit Court with a plan to maintain the county's supervisory districts at 26 rather than increase that number by 3 districts.

At the state level, the League has advocated since 1981 to have a nonpartisan or bipartisan entity draw new congressional and legislative district maps, starting with proposals crafted by local governments.

What is being proposed in the bills before us today is not simply a matter of flouting some of the technicalities in our laws and traditions. Rather, these proposals turn our state's process of governing into a charade and weaken its foundation. The strength of our form of government stems from the people believing that their elected representatives have the public's interest at heart, not personal interests. These proposals defy that principle.

More specifically, we offer the following comments about the proposals addressed in today's hearing:

1. The process and timing outlined in these bills show no respect for the local government officials and citizens who have been working for weeks to develop local redistricting plans. Traditionally, and by law, they are allowed to develop local district maps before the state legislature weighs in. Yet SB148 and SB149 propose specific district maps and simply state that if the local district lines are not consistent with those of the state, the local governments will have to adapt at their own expense. These bills change the rules midstream and are an affront to the people who know their communities the best.
2. The League does not believe for a minute that it is a coincidence that these maps were released on the Friday afternoon before the first of a series of recall elections. As if it is not bad enough that voters and local officials had to adapt in a few short weeks to a restrictive new election law, now the sponsors of

these bills are turning the traditionally grassroots redistricting process upside-down with a top-down, big-government proposal in the midst of the recall elections. The shameful result – and we believe the purpose – is to further confuse voters and suppress participation in the elections.

3. Wisconsin's elections over the past 15 years have shown our state to be evenly divided politically. Most Wisconsinites are independent voters. Any redistricting map should reflect the *tenor* of the state, not the *tenure* of current elected officials. The goal should be to provide the best possible representation for citizens, who by the way are tired of elected officials who are so polarized they cannot work together without spurring multiple recall elections.
4. We urge you not to rush this once-a-decade process for the sake of partisan gain. Properly noticed public hearings at all levels around the state, open meetings and full transparency are essential so that citizens can participate and have faith in the outcome. In addition, citizens should have time to consider alternative maps, developed by nonpartisan groups, which offer legitimately drawn districts that preserve compactness, contiguity, communities of interest, substantial equality of population and, last but not least, greater competitiveness.

Lest you think that the League of Women Voters is criticizing the proposed plan because of partisan preference, I assure you that for decades we have advocated to place the redistricting process in the hands of a nonpartisan entity. We have in our office a 1989 letter from then Assembly Majority Leader Dave Travis who assailed the League for being "pro-Republican." At least in the past, redistricting has been carried out with a divided legislature, which resulted in a modicum of balance. The fact is that while control of the legislature has changed, our position has not.

The need for nonpartisan redistricting is only made more obvious by the poorly-timed introduction of the clearly gerrymandered districts in SB148 and SB149. We urge you to reject these proposals and make this year's redistricting process one you can be proud to tell your grandchildren about in the future.

Thank you.



To: Senate Committee on Judiciary, Utilities, Commerce, and Government Relations
Assembly Committee on Homeland Security and State Affairs

From: Dan Thompson, Executive Director, League of Wisconsin Municipalities
Mark O'Connell, Executive Director, Wisconsin Counties Association

Date: July 13, 2011

Re: SB 150, Modifying the Local Redistricting Process

The League of Wisconsin Municipalities and the Wisconsin Counties Association offer the following comments on SB 150 for information purposes only. Our member counties and municipalities have been working together on the local redistricting process since early spring. We are concerned about the speed in which SB 150 is advancing through the legislative process. We are also concerned about SB 150 retroactively changing the timing and reversing the order of the redistricting process after local governments have already spent much time, resources, and money on establishing municipal wards and using those wards to form election districts. Passage of SB 150 will result in much of that work being wasted.

SB 150 requires municipal ward plans, and the aldermanic and supervisory districts upon which they are based, to reflect municipal boundaries on April 1 of the year of each federal decennial census. Under current law, ward plans must reflect municipal boundaries on August 1 of the year following the year of the decennial census. This change would apply retroactively to ward plans and aldermanic and supervisory districts created or in the process of being created in response to the 2010 census.

The bill also amends the laws governing municipal ward division to ensure that if municipal wards do not accommodate a congressional or legislative redistricting plan on its date of enactment, the municipalities must change their wards.

Redistricting has been a bottom up process with local governments finishing their maps first and then state and federal district boundaries drawn to keep wards intact. One important reason for this order of events is that wards must be compact and observe the community of interest of existing neighborhoods. Wards must also take into account the county supervisory district plan. Only municipalities and counties working together can construct wards meeting those and other standards spelled out in state law.

We urge the Legislature to proceed cautiously and slowly with regard to SB 150. Take time to gain a better understanding of the bill's full ramifications for local governments and voters, and make adjustments to the bill where advisable.



CITY OF MILWAUKEE

TOM BARRETT
Mayor

July 13, 2011

WILLIE L. HINES, JR.
15th District Alderman
Common Council President

Assembly Committee on Homeland Security & State Affairs
Senate Committee on Judiciary, Utilities, Commerce & State Operations
State Capitol
Madison, WI 53701

ASHANTI HAMILTON
1st District Alderman

JOE DAVIS, SR.
2nd District Alderman

Dear Members:

NIK KOVAC
3rd District Alderman

Due to the short notice of this public hearing, we were unable to change previous commitments and appear before you in person. That being stated, we believe that Senate Bill 150 has profound and negative impacts on local governments and the redistricting process we have followed since 1971.

ROBERT J. BAUMAN
4th District Alderman

JAMES A. BOHL, JR.
5th District Alderman

We oppose the proposed changes to the current state law.

MILELE A. COGGS
6th District Alderwoman

As prescribed by state statute since 1971, the City of Milwaukee began its redistricting process in February, 2011 and completed that process Friday, July 8, 2011. During that process the city held four public hearings, participated in three public listening sessions, held two full-day public workshops for citizens to produce their own maps, and conducted countless informal briefings to individuals and interested citizen groups. The city cost of the dedicated labor hours and administrative expense total over \$40,000. Passage of Senate Bill 150 would cost the city an additional \$10,000 or more to make the retroactive changes mandated after the process by the state negating local authority to establish its boundaries.

WILLIE C. WADE
7th District Alderman

ROBERT G. DONOVAN
8th District Alderman

ROBERT W. PUENTE
9th District Alderman

MICHAEL J. MURPHY
10th District Alderman

Senate Bill 150 negates months of work, outright dismisses our open and transparent public hearing process, and wastes our taxpayer dollars. While the city has had little time for an in-depth analysis of the state's legislative district lines and the impacts it will have on communities of interests and our neighborhoods, we have identified widespread ward splitting that will force the Common Council and Mayor to initiate a second redistricting process – only a few short weeks after we completed a legal and comprehensive ward and aldermanic district mapping process.

JOSEPH A. DUDZIK
11th District Alderman

JAMES N. WITKOWIAK
12th District Alderman

TERRY L. WITKOWSKI
13th District Alderman

The proposed legislative districts fail to incorporate the city's ward lines and therefore split 17% of all City of Milwaukee wards [55 wards] and mandate the

TONY ZIELINSKI
14th District Alderman

City of Milwaukee to redraw the boundaries of nine aldermanic districts. Please see attached map.

By excluding local governments and ignoring natural boundaries and local factors that bind communities of interest, you have arrogantly mandated artificial ward lines without regard to local concerns. You have intentionally done this in order to gain extreme partisan advantage at the expense of equal and fair representation.

Current law properly ensures that local governments – the unit of government that is closest to its electors - have a strong voice in the redistricting process. The very fact that you need to pass a new state law that allows you to circumvent a process that has been in place since 1971 displays your raw intentions to grab more partisan advantage at the expense of local input.

Furthermore, voters in up to six Milwaukee County Assembly seats will significantly lose their influence in choosing who represents them to voters outside of Milwaukee County. For the largest county in Wisconsin and, the economic engine for the entire state, that is a significant loss of representation.

Senate Bill 150 is a power grab that allows this to occur without the proper public disclosure, debate and discourse that was followed in the City of Milwaukee.

The people of Wisconsin do not want a strong, central, State Government. Yet, that is what the Senate and Assembly leadership are forcing on the residents of our great State.

Today we call on you to slow this process down. You must hold more public hearings, allow more citizen participation and provide opportunities for the submission of alternative maps that will be seriously considered. And, you must respect the work being done by local units of government. No legislative vote should be taken until these provisions are fulfilled.

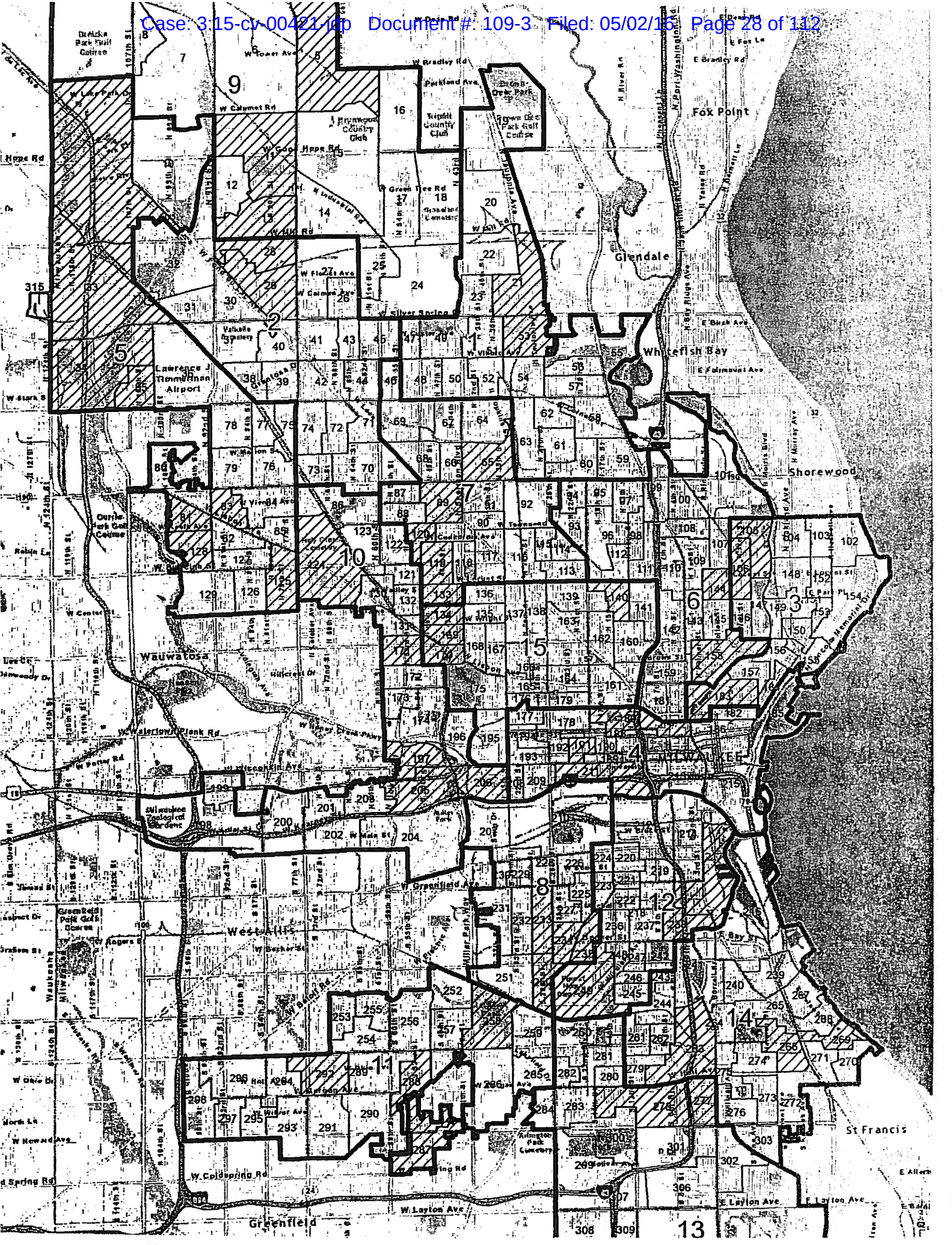
Respectfully,

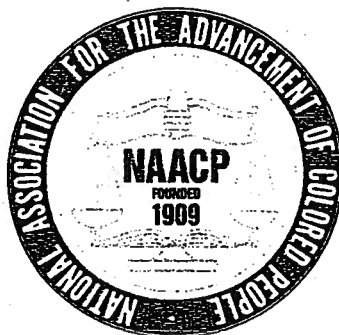


Tom Barrett
Mayor



Ashanti Hamilton
Chair, Judiciary and Legislation Committee





**STATEMENT OF WENDELL HARRIS ON BEHALF OF MILWAUKEE BRANCH OF
THE NAACP AND THE NAACP STATE CONFERENCE OF BRANCHES**

Wednesday, July 13, 2011

**Before the Senate Judiciary Committee and
the Assembly Homeland Security Committee**

Good morning. My name is Wendell Harris, and I am a long-standing member and former Vice President of the Milwaukee Branch NAACP. I am the current chairperson of the Education Committee for the Wisconsin NAACP State Conference of Branches. I have been asked to speak today on behalf of the Milwaukee Branch and the State Conference, Presidents James Hall and Thomas White, respectively.

Founded in 1909, the NAACP is the nation's longest-standing civil rights organization. The NAACP was instrumental in the struggle to outlaw legal segregation in the United States. Our stated mission is to ensure the political, educational, social, economic equality and rights of all persons, and to eliminate racial hatred and discrimination. Perhaps our most important focus has been to ensure the right to vote for African-American citizens -- including the right to make our votes count in a meaningful manner.

The NAACP helped secure the passage of the historic Voting Rights Act of 1965, and its extensions in '70, '75, '82, and most recently in 2007. The NAACP and its branches have

litigated hundreds of voting rights cases under the U.S. Constitution and later, the Voting Rights Act to guarantee those rights for all African Americans. We fought to outlaw electoral devices and schemes which deny, abridge, suppress, or dilute the rights to vote. Our State's NAACP Branches have likewise fought to ensure meaningful representation of the votes of all African-Americans in the State of Wisconsin.

As African-American voters, when it comes to drawing electoral districts, we see our right to vote in two ways. First, we fight to ensure that in districts that include large concentrations of African Americans, the lines are drawn which permit us to elect the candidates that best represent our issues and concerns. As such, we have the right to have electoral districts that do not dilute our vote. Second, in those electoral districts and geographic areas where we do not constitute the majority, we also have the right to INFLUENCE the election of candidates who acknowledge that our issues and concerns matter and will be included in the decision making processes.. It is in this situation – the right to influence the outcome of elections – that the Republican redistricting plan disenfranchises thousands of African American voters, primarily in Southeastern Wisconsin.

The Republican redistricting plan does this by packing all African-American voters into single districts– for the sole purpose of removing influential African-American voters from otherwise white-majority districts in which we could have an influence on the outcome of the election. As you know, the Republican redistricting plan

- Removes African-American voters residing in District 8 – currently represented by Sen. Darling – and packs us into the largely African-American district currently represented by Sen. Taylor.

- It also removes African-American voters currently represented by Sen. Vukmir in District 5, and packs those voters into the largely African-American district currently represented by Sen. Coggs in District 6.
- Equally pernicious is the packing of all African-American voters living in Racine and Kenosha – currently represented by Senators Wangaard and Wirch – into a single senate district, eliminating the ability of those African-American voters to have an influence over the two Senate districts.

Under the Republican redistricting plan, African-American voters have now lost the ability to influence the outcome in 3 Senate districts in southeastern Wisconsin.

A final point regarding process: The drawing of such lines requires the collective input of many groups and individuals. Like millions of other Wisconsin voters, we in the NAACP did not learn until this week exactly how this proposed Republican redistricting plan would impact voters. We are appalled that Republican leadership intended to fast-track this process right past the local redistricting planning processes that are currently underway in our cities and counties, even to the point that this redistricting plan will even run roughshod over existing ward lines.

By carving up numerous wards into multiple legislative districts, the legislature will make the administration of our elections confusing and potentially an administrative nightmare. This affront to the democratic process – both on the state and local level -- must be changed so that all citizens are afforded a meaningful opportunity to examine, debate, and provide input on how our legislative district lines will eventually be drawn. Thank you.

Add to Assembly District 44. Delete from Assembly District 31.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: S51050013032058
 Municipality: Janesville - C
 Ward: Janesville - C 22
 Locked: 0
 Split: 0
 Total Population: 10
 White: 7
 Hispanic: 3
 Black: 0
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Multi: 0

Plan Name: roci_janesvillewards1w_ward
 Editing Tools Legend Links

Editing Information

Janesville - C

Assign MCD: Zoom To MCD

District Number: 22
 District Color: Light Orange
 Update Last

Change Map Opacity: 7.3

Ward Creation Info

Total Population: 63,575
 Population Range: 800 to 3,200

Janesville - C 21	2,227	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,131	39	20	4	2	31	0	0
Janesville - C 23	2,913	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,368	269	159	19	0	86	2	10
Janesville - C 24	2,951	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,779	65	68	3	1	32	2	1
Janesville - C 25	2,748	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,585	67	64	4	3	25	0	0

8:47 PM Tuesday

Add to Assembly District 44. Delete from Assembly District 31.

Restricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: 551050013024004
 Municipality: Janesville - C
 Ward: Janesville - C 22
 Locked: 0
 Split: 0
 Total Population: 7
 White: 4
 Hispanic: 0
 Black: 3
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Multi: 0

Plan Name: rock_janesvillewards1w_ward
 Editing Tools Legend Links

Editing Information

Janesville - C

Assign MCD Zoom To MCD

District Number: 22
 District Color: Light Orange
 Undo Last

Change Map Opacity: 73

Ward Creation Info

Total Population: 69,575
 Population Range: 800 to 3,200

Janesville - C 21	2,227	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,131	39	20	4	2	31	0	0
Janesville - C 23	2,913	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,368	269	159	19	0	86	2	10
Janesville - C 24	2,951	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,779	65	68	3	1	32	2	1
Janesville - C 25	2,748	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,585	67	64	4	3	25	0	0

6:20 PM

Add to Assembly District 44. Delete from Assembly District 31.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: 551050013024077
 Municipality: Janesville - C
 Ward: Janesville - C 22
 Locked: 0
 Split: 0
 Total Population: 0
 White: 0
 Hispanic: 0
 Black: 0
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Multi: 0

Plan Name: rock_janesvillewards1w_ward

Editing Information

Janesville - C

District Number: 22

District Color: Light Orange

Change Map Opacity: 75

Ward Creation Info

Total Population: 63,575
 Population Range: 800 to 3,200

Color	District	Population	Target	Within Range	Locked	Assign	White	Hispanic	Black	American Indian	Pacific	Asian	Other	Other Multi
	Janesville - C 22	2,797	800 to 3,200	Yes	<input type="checkbox"/>	Assign to District	2,616	97	44	7	1	29	1	2
	Janesville - C 1	2,664	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,457	90	57	17	12	30	1	0
	Janesville - C 2	2,695	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,384	180	64	21	1	43	1	1

Done

Taskbar: Start, Internet Explorer, Janesville - C 22, Redistricting Project, 8:51 PM, Tuesday

Add to Assembly District 44. Delete from Assembly District 31.

31.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: 551050013024079
 Municipality: Janesville - C
 Ward: Janesville - C 22
 Locked: 0
 Split: 0
 Total Population: 0
 White: 0
 Hispanic: 0
 Black: 0
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Mult: 0

Plan Name: rock_janesvillewards1w_ward

Editing Tools Legend Links

Editing Information

Janesville - C

Assign MCO: Zoom MCO

District Number: 22

District Color: Light Orange

Change Map Opacity: 7

Ward Creation Info

Total Population: 63,575
 Population Range: 800 to 3,200

Color	District	Population	Target	Within Range	Locked	Assign	White	Hispanic	Black	AmIndian	Pacific	Asian	Other	Othermi
	Janesville - C 22	2,797	800 to 3,200	Yes	<input type="checkbox"/>	Assign to District	2,616	97	44	7	1	29	1	2
	Janesville - C 1	2,664	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,457	90	57	17	12	30	1	0
	Janesville - C 2	2,695	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,384	180	64	21	1	43	1	1

8:52 PM Tuesday

Add to Assembly District 44. Delete from Assembly District

31.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville, Wisconsin

Information

Block ID: 551050013024078
 Municipality: Janesville - C
 Ward: Janesville - C 22
 Locked: 0
 Split: 0
 Total Population: 0
 White: 0
 Hispanic: 0
 Black: 0
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Mult: 0

Plan Name: rock_janesvillewards1w_ward
 Editing Tools Legend Links

Editing Information
 Janesville - C
 Assign MCD Zoom To MCD
 District Number: 22
 District Color: Light Orange
 Undo Last
 Change Map Opacity: 75
 Ward Creation Info
 Total Population: 63,575
 Population Range: 800 to 3,200

Color	District	Population	Target	Within Range	Locked	Assign	White	Hispanic	Black	American Indian	Pacific	Asian	Other	Other Mult
	Janesville - C 22	2,797	800 to 3,200	Yes	<input type="checkbox"/>	Assign to District	2,616	97	44	7	1	29	1	2
	Janesville - C 1	2,664	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,457	90	57	17	12	30	1	0
	Janesville - C 2	2,695	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,384	180	64	21	1	43	1	1

6:53 PM Tuesday

Add to Assembly District 31. Delete from Assembly District

44.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: 551050013042000
 Municipality: Janesville - C
 Ward: Janesville - C22
 Locked: 1
 Split: 0
 Total Population: 0
 White: 0
 Hispanic: 0
 Black: 0
 American Indian: 0
 Pacific Islander: 0
 Asian: 0
 Other: 0
 Other Multi: 0

Plan Name: rock_janesvillewards1w_ward
 Editing Tools Legend Links

Editing Information

Janesville - C

Assign MCD: [button] Zoom MCD: [button]

District Number: Unassign [button]
 District Color: Light Yellow [button]

Change Map Opacity: 72

Ward Creation Info

Total Population: 63,575
 Population Range: 800 to 3,200

Color	District	Population	Target	Within Range	Locked	Assign	White	Hispanic	Black	American Indian	Pacific	Asian	Other	Other Multi
	Janesville - C 19	1,430	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	1,314	36	27	1	0	46	5	1
	Janesville - C 1	2,664	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,457	90	57	17	12	30	1	0
	Janesville - C 2	2,695	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,384	180	64	21	1	43	1	1

8:13 PM Tuesday

Add to Assembly District 31. Delete from Assembly District

44.

Redistricting Project - Microsoft Internet Explorer provided by City of Janesville Wisconsin

Information

Block ID: 551050013042000
Municipality: Janesville - C
Ward: Janesville - C 22
Locked: 1
Solic: 0
Total Population: 0
White: 0
Hispanic: 0
Black: 0
American Indian: 0
Pacific Islander: 0
Asian: 0
Other: 0
Other Multi: 0

Plan Name: rock_janesvillewards1w_ward

Editing Tools Legend Links

Editing Information

Janesville - C

Assign MOD Unassign MOD

District Number: Unassign

District Color: Light Yellow

Undo Last

Change Map Opacity: 73

Ward Creation Info

Total Population: 63,575
Population Range: 800 to 3,200

Color	District	Population	Target	Within Range	Locked	Assign	White	Hispanic	Black	American Indian	Pacific	Asian	Other	Other Multi
	Janesville - C 19	1,430	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	1,314	36	27	1	0	46	5	1
	Janesville - C 1	2,664	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,457	90	57	17	12	30	1	0
	Janesville - C 2	2,695	800 to 3,200	Yes	<input checked="" type="checkbox"/>	Assign to District	2,384	180	64	21	1	43	1	1

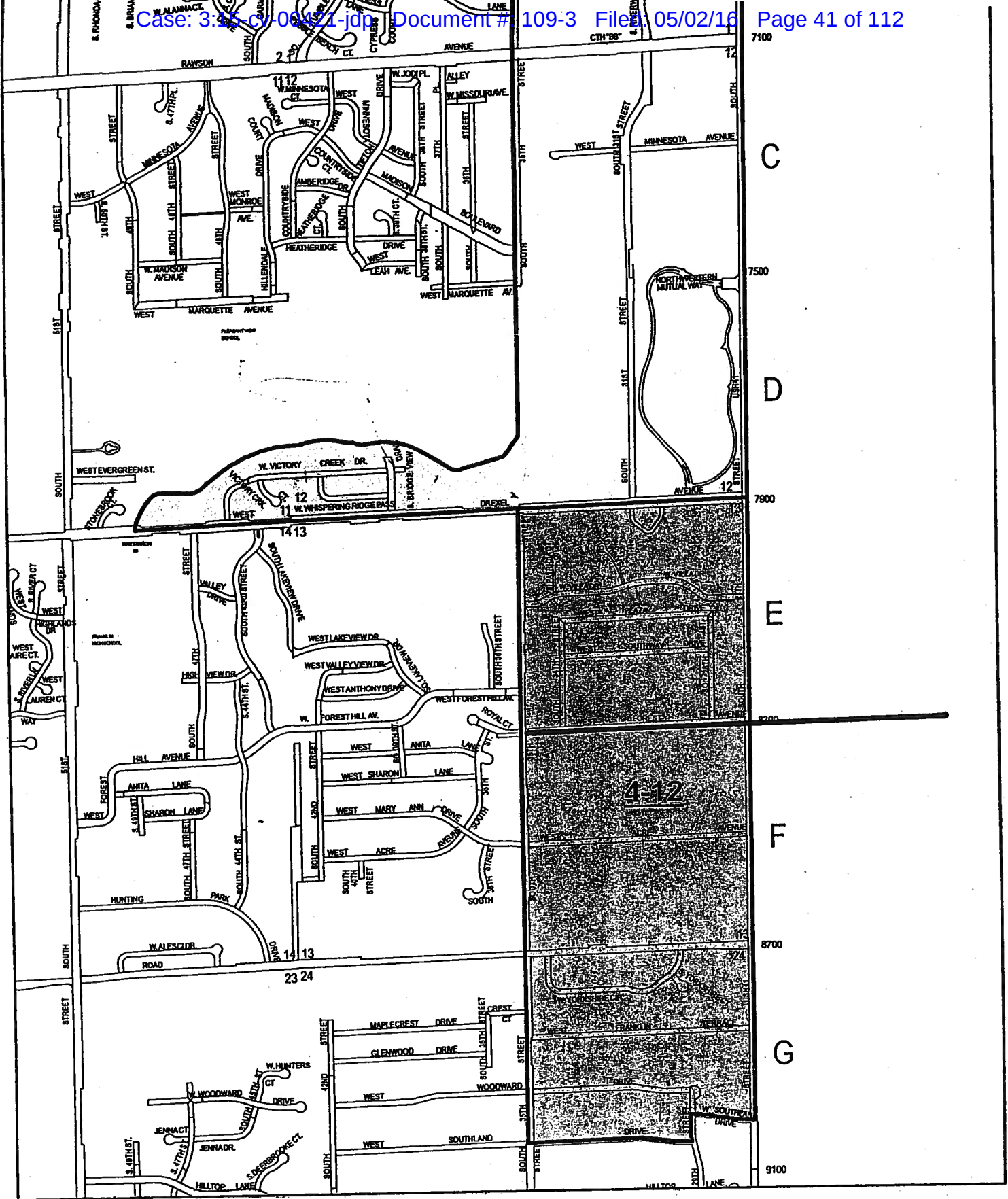
8:13 PM Tuesday

District Priorities

1. Districts should be essentially the same population. The goal will be to have all districts with about 2% (plus or minus) of the target population for a district.
2. Districts should be compact. That is, they should closely approximate a square or a circle. They should not be long and narrow, and should avoid major appendages.
3. Districts should minimize the crossing of municipal (city, village, and town) boundaries. A municipality should include the fewest number of districts that is possible. A district should include the fewest number of municipalities that is possible.
4. When municipalities are combined or split in forming districts, every effort should be made to maintain the integrity of incorporated communities.
5. When it is not possible for district boundaries to follow municipal boundaries, physical barriers should be followed such as significant rivers and major highways first, and other physical features second.
6. District should avoid the creation of small isolated wards. A small section of an adjoining municipality should not be used to complete a district whenever possible. The minimum ward size should be about 300-400 persons.

Planning Department Requested Ground Rules

1. The Planning Department does not want to know where any current or prospective County Board supervisor resides.
2. Contact with the Planning Department staff regarding redistricting plans during the development of plan options is limited to the Ad Hoc Redistricting Planning Committee chairperson or vice-chairperson.
3. Limit the number of options that we are asked to develop (3-4 maximum).



7100

C

D

E

F

G

7500

7800

8200

8700

9100

4-12

23 24

MINNESOTA AVENUE
MARQUETTE AVENUE
WEST MARQUETTE AV.
W. VICTORY CREEK DR.
W. WISPERING RIDGE PASS
W. FOREST HILL AV.
WEST ANTONY DRIVE
WEST VALLEY VIEW DR.
WEST LAKELAND DR.
WEST SHARON LANE
WEST MARY ANN DRIVE
WEST ACRES AVENUE
W. HUNTERS DRIVE
W. WOODWARD DRIVE
JENNACHT
HILLTOP LANE

WEST EVERGREEN ST.
WEST FOREST HILL AV.
HILL AVENUE
HUNTING PARK
W. VALESCOR ROAD

MINNESOTA AVENUE
WEST MARQUETTE AV.
WEST FOREST HILL AV.
WEST ANTONY DRIVE
WEST VALLEY VIEW DR.
WEST LAKELAND DR.
WEST SHARON LANE
WEST MARY ANN DRIVE
WEST ACRES AVENUE
W. HUNTERS DRIVE
W. WOODWARD DRIVE
JENNACHT
HILLTOP LANE

Disenfranchisement

2002 Court Submissions			
Plan	Party	# Disenfranchised	% of Total Population
JP1	GOP	203,938	3.73%
JP2	GOP	211,494	3.87%
JP3	GOP	248,772	4.55%
AB 842	GOP	208,334	3.81%
Dem A	Dem	303,951	5.56%
SB 463	Dem	301,604	5.52%
CCE	Dem	553,790	10.14%
WMC		433,175	7.93%
Court Plan		171,613	3.14%

1992 Court Submissions			
Plan	Party	# Disenfranchised	% of Total Population
Prosser IIIA	GOP	392,000	8.01%
Legis. Plan	Dem	200,000	4.09%
Court Plan		257,000	5.25%

Foltz, Adam

From: Keane, Michael
Sent: Monday, July 11, 2011 1:03 PM
To: Foltz, Adam
Attachments: 2000_Pop18_2002_ASM.XLSX

Adam:

I had LTSB prepare this spreadsheet. Hope it is self-explanatory.

Mike Keane
LRB
6-0346

Foltz, Adam

From: Keane, Michael
Sent: Monday, July 11, 2011 10:36 AM
To: Foltz, Adam
Subject: 2002 Redistricting plan.

Adam:

Wisconsin Brief 02-3 illustrated the population of each legislative district. You can get a copy of the brief here:

<http://legis.wisconsin.gov/lrb/pubs/wb/02wb3.pdf>

Mike Keane
LRB
6-0346

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Monday, July 11, 2011 12:18 PM
To: Foltz, Adam; Ottman, Tad
Subject: RSWG - IT Subcommittee

From: Van Der Wielen, Tony
Sent: Wednesday, April 14, 2010 1:46 PM
To: Ottman, Tad; Keane, Michael; Ylvisaker, Jeff; 'gratz@speedymail.org'; 'MWhite@theshopconsulting.com'; Foltz, Adam
Cc: *Legislative GIS Staff; Oehlert, Lori; dlveroff@facstaff.wisc.edu
Subject: RSWG - IT Subcommittee

Redistricting Workstation Update

The redistricting workstations have been configured and are ready to be deployed.

We will deploy the first machine to the LRB this week.

The autoBound software is configured with 2001 wards, MCDs (Cities, Towns and Villages) and Counties. All data is configured with Census 2000 population totals.

We are currently working on configuring a dataset that includes 2009 block estimates and all major election data from the past 10 years.

In the next couple of weeks I would like to setup an IT subcommittee meeting to discuss redistricting data and training needs.

Here are some notes on the configuration.

Hardware/OS:

- Processor: Intel(R) Core(TM)2 Duo CPU E8400 @3.00GHz
- RAM: 8.00 GB
- System: 64bit OS
- OS: Windows 7 Enterprise
- RAID 1 Configured
- 1TB External Hard drive
- (2) 22" Monitors

Software:

- AutoBound 9: Redistricting and Reapportionment System
- ArcGIS 9.3.1 (Latest version)

Data:

- **Default Paths**
 - Data Environment: C:\Wisconsin
 - Saved Plans: C:\Wisconsin\Workspace
 - Database: C:\Wisconsin\Statewide
- **Data Descriptions:**
 - **Blocks:** These are actually Wards, not blocks. When using the system you will need to select Blocks in the active layers when building districts by Wards.
 - **VTDS:** These are actually Municipal areas (i.e. Townships, Cities, Villages etc). When using the system you will need to select VTDS in the active layers when building districts by Municipal areas.
- **Future Data Updates:**
 - You will be given access to a network drive folder (Leg_GIS).
 - Data updates will be placed in this drive and instructions will be given how to update your own databases with the most recent data available at that time.

ny J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Wednesday, May 25, 2011 9:16 AM
To: Foltz, Adam; Ottman, Tad
Subject: Slow assignments

I would try and do a recalculation of the plan and choose "no". This should help.

I am looking into this further today.

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Tuesday, May 24, 2011 5:06 PM
To: Foltz, Adam
Subject: Memorial Day Weekend

Tad and Adam,

I would like to get a better idea on your support needs for this weekend.

We would like to make arrangements for coverage.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Tuesday, May 24, 2011 5:06 PM
To: Foltz, Adam; Ottman, Tad
Subject: Disenfranchisement .mdb and Report
Attachments: Disenfranchisement.zip

Tad and Adam,

Here is the new database and report for disenfranchisement. This will only work on Senate plans (I am working on Assembly now).

You will need to replace the reports.mdb in the C:\Program Files (x86)\autobound10 directory on your machine. You will also need to replace the Disenfranchisement.rpt in the C:\Program Files (x86)\autobound10\reports directory on your machines.

For old plans you will need to:

1. Delete the reports.mdb in you workspace directory
2. Delete the Disenfranchisement.rpt in the reports directory in the workspace.
3. Run the Core Constituency Analysis.
4. Run the Disenfranchisement report from the autoBound "Run Reports" menu.

Call with any questions.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Tuesday, May 24, 2011 11:50 AM
To: Ottman, Tad; Foltz, Adam
Subject: RE: Disenfranchisement

I just want to confirm it works with the Senate District Plans. I am still working on the Assembly side.

Tony

-----Original Message-----

From: Ottman, Tad
Sent: Monday, May 23, 2011 5:17 PM
To: Van Der Wielen, Tony
Subject: RE: Disenfranchisement

I finally got the disenfranchisement report to run, but it was off by a 6 figure magnitude compared to the same core constituency report on a senate plan. Some totals from even numbered senate districts it had dead on, others were off by 100's to 1000's, and in still others, it missed complete totals from even numbered senate districts that wound up in odd numbered districts.

-----Original Message-----

From: Van Der Wielen, Tony
Sent: Fri 5/20/2011 3:53 PM
To: Ottman, Tad; Foltz, Adam
Subject: Disenfranchisement

Tad and Adam,

Can you look at this report to see if the structure works for you.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov <<mailto:Tony.vanderwielen@legis.wisconsin.gov>>

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Friday, May 20, 2011 3:53 PM
To: Ottman, Tad; Foltz, Adam
Subject: Disenfranchisement
Attachments: disenfranchisement.pdf

Tad and Adam,

Can you look at this report to see if the structure works for you.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Friday, May 13, 2011 12:57 PM
To: Foltz, Adam
Subject: Split Geography
Attachments: Political Subdivisions Split Between Districts Report.pdf

Adam,

I have included an analysis of the tool that is in autoBound to record split geography. The way the report reads it is only counting the splits once per district split.

To create a Block assignment file do the following. Under plan exchange tools choose "Export Plan". From "Block Assignment File" from the dropdown.

I am working on disenfranchisement.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
fx: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Tuesday, May 10, 2011 2:00 PM
To: Foltz, Adam
Subject: Data

<http://www.doa.state.wi.us/subcategory.asp?linksubcatid=354&linkcatid=11&linkid=64&locid=9>

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Wednesday, May 04, 2011 1:25 PM
To: Foltz, Adam; Ottman, Tad
Cc: Squires, Ryan
Subject: RE: Autobound crash
Attachments: image001.png

Tad and Adam,

Does this happen when assigning from a particular layer?

Is this with all your plans (New, Existing or one's created from a template)? Do the plans have spaces or special characters in their name?

I have been trying hard to recreate the error and I may need some more information.

Thank you,

Tony

From: tottman [mailto:]
Sent: Wednesday, May 04, 2011 10:23 AM
To: Squires, Ryan
Subject: Autobound crash

Ryan,

This is a picture of what I get when autobound crashes on me. I was working on a map that has effectively 8 Assembly Districts assigned, I clicked on "current district" on the autobound tools to switch districts. The district numbers came up, when I clicked on the new district I wanted to move to, the program crashed and closed out and this popped up: (If form holds, this will happen on nearly every district switch using the toolbar the rest of the way until I have them all filled in and can left click between districts)

ArcGIS Desktop

ArcGIS Desktop has encountered a serious application error and is unable to continue.



If you were in the middle of something, the information you were working on might be lost.

Please tell ESRI about this problem.

We have created an error report. Press the 'Send Error Report' button to send the error report to us automatically over the internet.

We will treat this report as confidential and anonymous.

Optionally, provide your email address and a description of the problem. We will contact you if we need additional information about this issue. Your email will only be used in relation to this issue.

Email Address:

What were you doing when the problem happened?

Include my system information in the error report

Send Error Report

Don't Send

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Wednesday, May 04, 2011 11:26 AM
To: Ottman, Tad; Foltz, Adam
Subject: 2010 State Senate Election Data

Tad and Adam,

Can you run through the following steps in autoBound. This will prepare your database for the 2010 State Senate Election Data.

1. Open the autoBound Administration tool.
 - a. Choose "Manage my Census and Political Data".
 - b. Choose "Calculate or Edit My Database".
 - c. Click on the "Add Field" button.
 - d. Add the following fields with the follow parameters
 1. Numeric
 2. Field 9, no decimals
- ii. SSDEM10
- iii. SSREP10
- iv. SSIND10
- v. SSSCAT10
- vi. SS10T

After the fields are added you may need to "Finalize database" to use autoBound again.
If this can be done before we come over tomorrow, I will be able to add the 2010 Senate data to your databases.

If you don't feel comfortable adding these fields in the database I can do it tomorrow.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Squires, Ryan
Sent: Thursday, April 14, 2011 3:10 PM
To: Ottman, Tad; Van Der Wielen, Tony
Cc: Foltz, Adam
Subject: RE: All Election Data Spreadsheet 2000 - 2010
Attachments: VTDS2010ED_wCounty_RevisedDistricts.xlsx

Hi Tad,

Here is another updated copy with Mt. Sterling and Bay View manually updated based on the MCD.

Thanks,

Ryan

-----Original Message-----

From: Ottman, Tad
Sent: Wednesday, April 13, 2011 12:09 PM
To: Squires, Ryan; Van Der Wielen, Tony
Cc: Foltz, Adam
Subject: FW: All Election Data Spreadsheet 2000 - 2010

After a little more examination, it looks like 7 wards unassigned to any districts, and something like 58 total wards that aren't assigned to any congressional districts.

-----Original Message-----

From: Ottman, Tad
Sent: Wed 4/13/2011 11:58 AM
To: Squires, Ryan; Foltz, Adam
Cc: Van Der Wielen, Tony
Subject: RE: All Election Data Spreadsheet 2000 - 2010

Ryan and Tony,

Looking at the table, I see 7 wards that are not assigned to any Assembly, Senate or Congressional district. They just have zeros in those columns.

Tad

-----Original Message-----

From: Squires, Ryan
Sent: Tue 4/12/2011 10:36 AM
To: Foltz, Adam; Ottman, Tad
Cc: Van Der Wielen, Tony
Subject: FW: All Election Data Spreadsheet 2000 - 2010

Here you are Adam and Tad. Let me know if there are any issues.

Thanks!

Ryan

From: Van Der Wielen, Tony
Sent: Tuesday, April 12, 2011 10:01 AM
To: Squires, Ryan
Subject: FW: All Election Data Spreadsheet 2000 - 2010

From: Van Der Wielen, Tony
Sent: Monday, April 11, 2011 2:35 PM
To: Foltz, Adam
Subject: RE: All Election Data Spreadsheet 2000 - 2010

Try this one.

Tony

From: Foltz, Adam
Sent: Monday, April 11, 2011 10:16 AM
To: Van Der Wielen, Tony
Subject: FW: All Election Data Spreadsheet 2000 - 2010

Here is what you sent me before we received the PL data.

Thanks,

Adam

From: Van Der Wielen, Tony
Sent: Thursday, January 27, 2011 1:50 PM
To: Foltz, Adam; Ottman, Tad
Cc: *Legislative GIS Staff
Subject: All Election Data Spreadsheet 2000 - 2010

Adam and Tad,

Here is the spreadsheet with reordered and renamed election data fields.

Let me know if you need changes.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>
<BLOCKED::http://wims.legis.state.wi.us/>

Foltz, Adam

From: Squires, Ryan
Sent: Thursday, April 14, 2011 2:16 PM
To: Ottman, Tad; Van Der Wielen, Tony
Cc: Foltz, Adam
Subject: RE: All Election Data Spreadsheet 2000 - 2010
Attachments: VTDS2010ED_wCounty_RevisedDistricts.xlsx

Hi Tad and Adam,

I have recalculated all of the districts for the wards. There are only 4 wards that do not have a district assignment and it is because they do not exist in the TIGER database, and we have no geography for where they actually are located.

Please let me know if you have any questions.

Thanks,

Ryan

-----Original Message-----

From: Ottman, Tad
Sent: Wednesday, April 13, 2011 12:09 PM
To: Squires, Ryan; Van Der Wielen, Tony
Cc: Foltz, Adam
Subject: FW: All Election Data Spreadsheet 2000 - 2010

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Adam

From: Van Der Wielen, Tony
Sent: Thursday, January 27, 2011 1:50 PM
To: Foltz, Adam; Ottman, Tad

Cc: *Legislative GIS Staff
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Adam and Tad,

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Let me know if you need changes.

Thank you,

Tony

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Thanks,

Adam

From: Van Der Wielen, Tony
Sent: Thursday, January 27, 2011 1:50 PM
To: Foltz, Adam; Ottman, Tad
Cc: *Legislative GIS Staff
Subject: All Election Data Spreadsheet 2000 - 2010

Adam and Tad,

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Let me know if you need changes.

Thank you,

Tony

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Wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>
<BLOCKED::http://wims.legis.state.wi.us/>

Foltz, Adam

From: Ottman, Tad
Sent: Wednesday, April 13, 2011 11:59 AM
To: Squires, Ryan; Foltz, Adam
Cc: Van Der Wielen, Tony
Subject: RE: All Election Data Spreadsheet 2000 - 2010

Ryan and Tony,

Looking at the table, I see 7 wards that are not assigned to any Assembly, Senate or Congressional district. They just have zeros in those columns.

Tad

-----Original Message-----

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Cc: Van Der Wielen, Tony
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Wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>
BLOCKED: :http://wims.legis.state.wi.us/>

Foltz, Adam

From: Squires, Ryan
Sent: Tuesday, April 12, 2011 10:37 AM
To: Foltz, Adam; Ottman, Tad
Cc: Van Der Wielen, Tony
Subject: FW: All Election Data Spreadsheet 2000 - 2010
Attachments: VTDS2010ED_wCounty.zip

Here you are Adam and Tad. Let me know if there are any issues.

Thanks!

Ryan

From: Van Der Wielen, Tony
Sent: Tuesday, April 12, 2011 10:01 AM
To: Squires, Ryan
Subject: FW: All Election Data Spreadsheet 2000 - 2010

From: Van Der Wielen, Tony
Sent: Monday, April 11, 2011 2:35 PM
To: Foltz, Adam
Subject: RE: All Election Data Spreadsheet 2000 - 2010

Try this one.

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Foltz, Adam

From: Van Der Wielen, Tony
Sent: Wednesday, March 30, 2011 8:59 PM
To: Foltz, Adam; Ottman, Tad
Cc: Squires, Ryan
Subject: RE: matrix switch recalc error
Attachments: Fix_Recalc.zip

Tad and Adam,

Here is what you will need to do.

Copy these files into the "c:\windows\syswow64" folder on your computers.

This will fix the recalculation error.

If you don't feel comfortable doing this I can stop over tomorrow morning.

Fred has added the ability to switch between an outline and a color ramp fill for the plan boundary.

To toggle between the default "outline" for the plan boundary and the "color ramp fill" use the "Reset Colors" tool found in the "Edit Tools" section of the autoBound tool bar. Choose "No" for a "Color Ramp Fill" of the plan boundary.

Let me know if you have any questions.

Thank you,

Tony

From: Foltz, Adam
Sent: Wed 3/30/2011 6:59 PM
To: Van Der Wielen, Tony; Squires, Ryan
Subject: matrix switch recalc error

This is the error i get every time i try to switch to my matrix.

Record Call Stack Sequence - Bottom line is error line.

QuickCompute C:\Programming\ArcGIS\AB9\V1\Toolbar_Dll\RedistrictingTools.frm Line : 4736

Error Number

91

Description

Object variable or With block variable not set

Record Call Stack Sequence - Bottom line is error line.

QuickCompute C:\Programming\ArcGIS\AB9\V1\Toolbar_DII\RedistrictingTools.frm Line : 4736

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Description

Object variable or With block variable not set

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Wednesday, March 30, 2011 8:12 PM
To: Foltz, Adam; Squires, Ryan
Subject: RE: matrix switch recalc error

Adam,

Close the error and do a recalculate. Choose "no" and let the recalculate run.

I will keep looking into this problem. This should keep you running for now.

Thank you,

Tony

From: Foltz, Adam
Sent: Wed 3/30/2011 6:59 PM
To: Van Der Wielen, Tony; Squires, Ryan
Subject: matrix switch recalc error

This is the error i get every time i try to switch to my matrix.

Record Call Stack Sequence - Bottom line is error line.

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Error Number

91

Description

Object variable or With block variable not set

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Tuesday, March 29, 2011 4:34 PM
To: Foltz, Adam
Subject: State Assembly

Adam,

I have the file out here.

<http://legis.wisconsin.gov/ltsb/wiselr/data.htm> (Assembly Geography/PL Merged)

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Monday, March 28, 2011 3:27 PM
To: Foltz, Adam
Subject: 2000 and 2010 pop VTDS

Adam,

The 2000 pop is right on the 2010 pop is a little off (should be less than 100 for the state).

Here is the file let me know if you have any questions.

<ftp://ftp.legis.wisconsin.gov/gis>

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Monday, March 28, 2011 3:02 PM
To: Foltz, Adam
Subject: I need a few more minutes....

I almost figured this out!

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Thursday, March 24, 2011 6:31 PM
To: Foltz, Adam
Subject: TIGER VTDS With 2000 Pop

Adam,

Here is the file it is too big to e-mail.

<ftp://ftp.legis.wisconsin.gov/gis/>

Let me know when you get this and I will take it down.

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Fred Hejazi [fhejazi@citygategis.com]
Sent: Thursday, March 24, 2011 6:01 PM
To: Squires, Ryan
Cc: Foltz, Adam; Van Der Wielen, Tony; Patrick O'Brien
Subject: Re: Copy plan error

I assume Patrick call you today. I passed the your call to him. I was a bit overwhelmed with calls today. I think you need the P3 patch to correct this. You can download and install it from www.citygategis.com/download/autobound10_P3.exe Make sure you point it to the location where autobound10 is installed.

Fred Hejazi
citygate gis
410-295-3333 ext111

On 3/24/2011 10:56 AM, Squires, Ryan wrote:
Hi Adam,

I think I got the same result as you. I created a new plan, copied it using "Copy Selected Plan", and it says that it copied successfully. It does look like it copied all of the files in the workspace, but doesn't show up in my AutoBound Plan Manager. I do not believe there is a way to force AutoBound to recognize its own plans. I did not get the error that you did, but I have the same issue. I have CC'd Fred.

Hi Fred and Patrick:

Could you please let us know what is happening with this? Is the only way to copy a plan to export it and then import it? If this is a bug, when should our end users expect a patch? Please let me know if you need any clarification on the issue, and if there is anything I can do to help troubleshoot.

Thanks,

Ryan Squires
Wisconsin

From: Foltz, Adam
Sent: Thursday, March 24, 2011 9:42 AM
To: Van Der Wielen, Tony; Squires, Ryan
Subject: Copy plan error

When i try to copy a plan and assign a new file name, I get the following error. Also, when i check the workspace folder, it appears to have copied all of the plan files into the new plans folder. However the new copied plan doesn't show up as in the plan manager. Is there a way to browse to the workspace folder and force autobound to recognize the plan?

An "OK" dialogue box with "An Unexpected Error Has Occurred Within the Application"

and the following error pops up underneath...

Record Call Stack Sequence - Bottom line is error line.

wndTaskPanel_ItemClick C:\Programming\ArcGIS\AB9\V1\Toolbar_DII\abManager.frm Line : 2241
CopyPlan C:\Programming\ArcGIS\AB9\V1\Toolbar_DII\abManager.frm Line : 3207

Error Number

70

Description

Permission denied

Foltz, Adam

From: Squires, Ryan
Sent: Thursday, March 24, 2011 9:57 AM
To: Foltz, Adam; Van Der Wielen, Tony; 'fnejazi@citygategis.com'; 'Patrick O'Brien'
Subject: RE: Copy plan error

Importance: High

Hi Adam,

I think I got the same result as you. I created a new plan, copied it using "Copy Selected Plan", and it says that it copied successfully. It does look like it copied all of the files in the workspace, but doesn't show up in my AutoBound Plan Manager. I do not believe there is a way to force AutoBound to recognize its own plans. I did not get the error that you did, but I have the same issue. I have CC'd Fred.

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To: Van Der Wielen, Tony; Squires, Ryan
Subject: Copy plan error

When i try to copy a plan and assign a new file name, I get the following error. Also, when i check the workspace folder, it appears to have copied all of the plan files into the new plans folder. However the new copied plan doesn't show up as in the plan manager. Is there a way to browse to the workspace folder and force autobound to recognize the plan?

An "OK" dialogue box with "An Unexpected Error Has Occurred Within the Application"

and the following error pops up underneath...

Record Call Stack Sequence - Bottom line is error line.

```
wndTaskPanel_ItemClick C:\Programming\ArcGIS\AB9\V1\Toolbar_DII\abManager.frm Line : 2241  
CopyPlan C:\Programming\ArcGIS\AB9\V1\Toolbar_DII\abManager.frm Line : 3207
```

Error Number

70

Description

Permission denied

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Thursday, February 24, 2011 11:33 AM
To: Ottman, Tad; Foltz, Adam
Subject: FW: PL and TIGER Data

FYI

-----Original Message-----

From: catherine.clark.mccully@census.gov [mailto:catherine.clark.mccully@census.gov]
Sent: Wednesday, February 23, 2011 7:14 AM
To: Van Der Wielen, Tony
Subject: RE: PL and TIGER Data

Hi Tony,

We're hoping for early March but that's subject to whether we're open or not--if we're shut down--it's then how long are we shut down.

Cathy

Cathy McCully, Chief
Census Redistricting Data Office

301-763-4039

fax 301-763-4348

cell-301-467-4845

catherine.clark.mccully@census.gov

From: "Van Der Wielen, Tony" <Tony.VanDerWielen@legis.wisconsin.gov>
To: <catherine.clark.mccully@census.gov>
Date: 02/22/2011 11:38 AM
Subject: RE: PL and TIGER Data

Cathy,

I hope all is going well.

I have been checking the RDO website and I can see we are not scheduled for this week. Could you give me any insight on the delivery of the PL data to Wisconsin?

Thank you!

Tony

-----Original Message-----

From: catherine.clark.mccully@census.gov
[mailto:catherine.clark.mccully@census.gov]
Sent: Friday, January 14, 2011 6:46 AM
To: Van Der Wielen, Tony
Subject: RE: PL and TIGER Data

Hi Tony,

We will be shipping Wisconsin on Tuesday by next day Fed-Ex. You should have it next Wednesday. It will be posted to the web on Thursday. Have you been watching our web site? You can track progress by going to the www.census.gov/rdo/data Products are listed in the left hand column and by clicking each product==you get a description and status report.

We're updating the site right now.

Cathy

Cathy McCully, Chief
Census Redistricting Data Office

301-763-4039
fax 301-763-4348
cell-301-467-4845
catherine.clark.mccully@census.gov

From: "Van Der Wielen, Tony"
<Tony.VanDerWielen@legis.wisconsin.gov>

To: <catherine.clark.mccully@census.gov>

Date: 01/13/2011 05:12 PM

Subject: RE: PL and TIGER Data

Cathy,

Do you have a information on the release of our TIGER data or our PL data?

We are getting a little nervous that we are last on the list to get data.

We have some tight deadlines for our local redistricting project and I am getting pressed for any word on delivery of our data.

Any information would be most appreciated.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov
Wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>

From: Van Der Wielen, Tony
Sent: Monday, November 22, 2010 10:31 AM
To: catherine.clark.mccully@census.gov
Subject: PL and TIGER Data

Cathy,

I wanted to touch base with you on the upcoming release of our redistricting data.

I noticed on the TIGER website that the release date for states has been pushed back (release is now to start in December). Has the TIGER release also been pushed back for RDP participants?

I also wanted to see if a copy of our PL 94-171 data could also be sent to CityGate GIS for processing.

Hope all is well with you and your family!

Thank you,

Tony
Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov
Wisconsin Interactive Map Server: <http://wims.legis.state.wi.us>

Foltz, Adam

From: Squires, Ryan
Sent: Monday, February 28, 2011 9:37 AM
To: Foltz, Adam
Cc: Van Der Wielen, Tony
Subject: RE: question
Attachments: Assembly_2011_2012.xls; Senate_2011_2012_LatLong.xls

Hi Adam,

There should be a copy in the AutoBound resources folder on your C drive, but just in case that one is not the most up to date I have attached a copy.

Thanks!

Ryan

From: Foltz, Adam
Sent: Friday, February 25, 2011 4:07 PM
To: Squires, Ryan
Subject: question

do you have the member address you validated in an excel sheet?

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Friday, March 04, 2011 2:09 PM
To: Foltz, Adam
Subject: Projection Files
Attachments: assembly.prj; senate.prj

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Monday, March 07, 2011 2:01 PM
To: Ottman, Tad
Cc: Foltz, Adam
Subject: SOS 02 Data
Attachments: All_Election_Data_Demographics_030711.zip

Tad,

I have added the 2002 SOS data to the spreadsheet.

Let me know if you have any questions.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Squires, Ryan
Sent: Monday, March 07, 2011 3:16 PM
To: Ottman, Tad; Foltz, Adam
Cc: Van Der Wielen, Tony
Subject: New Map Generator
Attachments: Map_Gen.zip

Hello Tad and Adam,

I have added the functionality that you requested for the Map Generator. When you are prompted for what type of plan it is, you will see a check box below Assembly Districts that asks if you want to group by senate districts. If you have an Assembly plan, and you want to create a Senate shapefile and make maps that will show all three Assembly districts in the Senate district, than use this option. If you have a plan, that is actually Senate districts (ie. 33 districts, without any assembly shapes) then choose Senate as the type of plan. You will need to complete a couple of steps to update your Map Generator.

1. Copy the attached MXD, and use it to replace the older Map Generator
2. Create a NEW folder under C:\Output_Maps called: "Senate_Districts" (without quotes). This is where the Senate District shapefiles will be placed after running the application with the "Group by Senate" option selected. The shapefiles of the Senate Districts will be called the plan name followed by "_SD" (ie. Plan2001_SD)

Please let me know if you have any questions.

Thanks!

Ryan Squires
GIS Analyst
Legislative Technology Services Bureau
608-283-1814

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Thursday, March 17, 2011 1:09 PM
To: Foltz, Adam
Subject: DOJ
Attachments: getdoc.cgi_dbname=2001_register&docid=01-1488-filed.pdf

Total population	662,140
Non-Hispanic	649,413 (98.1%)
White	374,291 (56.5%)
Black or African American	262,384 (39.6%)
Asian	6,161 (0.9%)
American Indian/Alaska Native	2,995 (0.5%)
Native Hawaiian or Other Pacific Uslander	375 (0.0%)
Some other race	882 (0.1%)
Other Multiple-Race (where more than one minority race is listed)	2,330 (0.4%)
Hispanic	12,727 (1.9%)

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Van Der Wielen, Tony
Sent: Thursday, March 17, 2011 1:54 PM
To: Foltz, Adam; Ottman, Tad
Subject: Field Calculations
Attachments: getdoc.cgi_dbname=2001_register&docid=01-1488-filed.pdf

Here is how the data was calculated.

1. Total Population = **PERSONS**
2. Hispanic Alone = **HISPANIC**
3. Non-Hispanic White = **WHITE**
4. Non-Hispanic Black + Non-Hispanic Black and White = **BLACK**
5. Non-Hispanic Asian + Non-Hispanic Asian and White = **ASIAN**
6. Non-Hispanic American Indian and Alaska Native + Non-Hispanic American Indian and Alaska Native and White = **AMINDIAN**
7. Non-Hispanic Native Hawaiian and Other Pacific Islander + Non-Hispanic Native Hawaiian and Other Pacific Islander and White = **PISLAND**
8. Non-Hispanic Some Other Race = **OTHER**
9. Non-Hispanic Other Multiple Race = **OTHERMLT**

10. Total Population over 18 = **PERSONS18**
11. 18 Hispanic Alone = **HISPANIC18**
12. 18 Non-Hispanic White = **WHITE18**
13. 18 Non-Hispanic Black + 18 Non-Hispanic Black and White = **BLACK18**
14. 18 Non-Hispanic Asian + 18 Non-Hispanic Asian and White = **ASIAN18**
15. 18 Non-Hispanic American Indian and Alaska Native + 18 Non-Hispanic American Indian and Alaska Native and White = **AMINDIAN18**
16. 18 Non-Hispanic Native Hawaiian and Other Pacific Islander + 18 Non-Hispanic Native Hawaiian and Other Pacific Islander and White = **PISLAND18**
17. 18 Non-Hispanic Some Other Race = **OTHER18**
18. 18 Non-Hispanic Other Multiple Race = **OTHERMLT18**

This is based on the DOJ Guidance that is attached to this e-mail.

If you add 2-9 together you will get 1 (Total Population).

If you add 11-18 you will get 10 (Persons18).

Let me know if you have any questions.

Thank you,

Tony

Tony J. Van Der Wielen
Legislative Technology Services Bureau
GIS Manager
Phone: 608-283-1817
Fax: 608-267-6763
E-mail: Tony.vanderwielen@legis.wisconsin.gov

Foltz, Adam

From: Wolff, Dana
Sent: Friday, March 18, 2011 3:43 PM
To: Ottman, Tad; Foltz, Adam
Subject: Senate Map
Attachments: SenateMap.pdf

Hello Tad and Adam,

Attached is the Senate District map comparing 2000 to 2010 pop counts.

Have a great weekend,

Dana

Foltz, Adam

From: Squires, Ryan
Sent: Monday, March 21, 2011 10:16 AM
To: Foltz, Adam
Cc: Van Der Wielen, Tony; Ylvisaker, Joel
Subject: RE: this morning's error
Attachments: image001.png

Hi Adam,

I am going to have to email Fred, so until we hear from him I can only offer you the work around of opening the MXD directly, exporting the shapefile, and reimporting it like you would for an old plan for now. I will let you know as soon as we hear from him. Sorry for the trouble.

Ryan

From: Foltz, Adam
Sent: Monday, March 21, 2011 10:08 AM
To: Squires, Ryan
Subject: RE: this morning's error

No, There are other plans that open properly
All other plans are working normally from what i can tell
Tad hasn't had this issue post-upgrade
just assigning
the program just sits there and i can't do anything else. Restarting the program is required before i can open another plan

From: Squires, Ryan
Sent: Monday, March 21, 2011 10:06 AM
To: Foltz, Adam; Van Der Wielen, Tony
Cc: Ylvisaker, Joel
Subject: RE: this morning's error

Hi Adam,

A few quick questions to help me narrow things down:

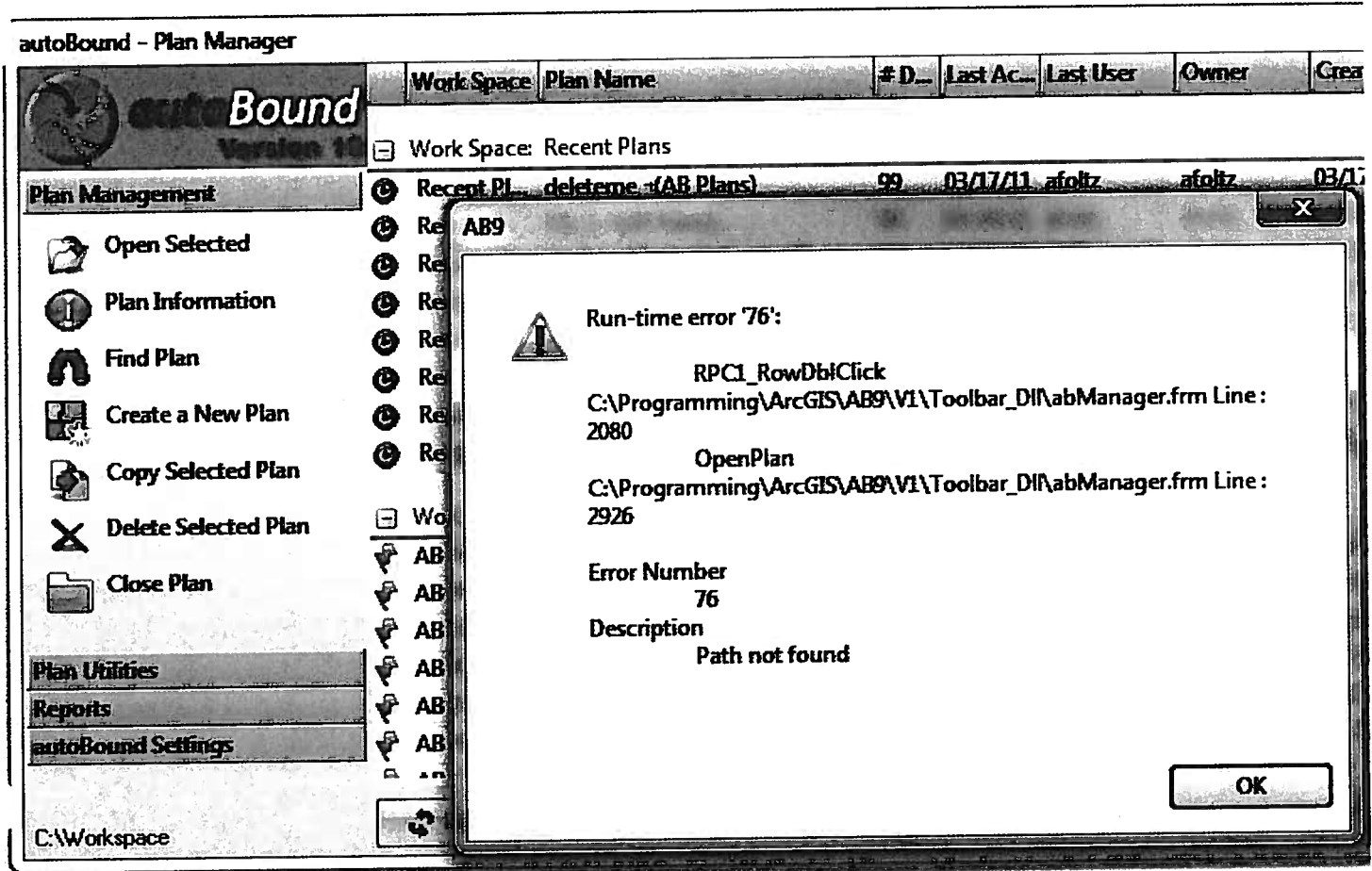
1. Is that the only plan you have created since the upgrade?
2. Do any other plans that we created (like the deleteme plan) have any issue opening?
3. Do you know if Tad is having any issues opening any of his plans?
4. Was this plan created from importing a shapefile, or just assigning?
5. What happens after the error?

Thanks,

Ryan

From: Foltz, Adam
Sent: Monday, March 21, 2011 10:02 AM
To: Van Der Wielen, Tony

Cc: Squires, Ryan
Subject: this morning's error



This happens when i try to open a plan i was working on last friday.



Adam Foltz <adamfoltz@gmail.com>

FW: MALDEF WI House Plan, (2nd edition)

6 messages

Jim Troupis <jrtroupis@trouplawoffice.com>

Mon, Jul 11, 2011 at 5:05 PM

To: tottman <tottman@gmail.com>, adamfoltz@gmail.com

Cc: "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

Troupis Law Office LLC

7609 Elmwood Ave

Suite 102

Middleton, WI 53562

608.807.4096jrtroupis@trouplawoffice.com

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From: Elisa Alfonso [mailto:ealfonso@MALDEF.org]**Sent:** Monday, July 11, 2011 4:50 PM**To:** 'Jim Troupis'**Cc:** Alonzo Rivas**Subject:** FW: MALDEF WI House Plan, (2nd edition)

Jim,

As promised, here is the MALDEF map we discussed this afternoon.

If you have any questions, please let us know.

Elisa

 **WI_House_MALDEF_Plan2.zip**
314K

tottman <tottman@gmail.com>

Mon, Jul 11, 2011 at 5:35 PM

To: Jim Troupis <jrtroupis@trouplawoffice.com>

Cc: adamfoltz@gmail.com, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

Jim Troupis <jrtroupis@trouplawoffice.com>

Mon, Jul 11, 2011 at 5:41 PM

To: tottman <tottman@gmail.com>

Cc: adamfoltz@gmail.com, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

Jim

Troupis Law Office LLC

7609 Elmwood Ave

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jrtroupis@troupislawoffice.com

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From: tottman [<mailto:tottman@gmail.com>]

Sent: Monday, July 11, 2011 5:35 PM

To: Jim Troupis

Cc: adamfoltz@gmail.com; McLeod, Eric M (22257); rptaffora@michaelbest.com

Subject: Re: FW: MALDEF WI House Plan, (2nd edition)

[Quoted text hidden]

tottman <tottman@gmail.com>

Mon, Jul 11, 2011 at 5:57 PM

To: Jim Troupis <jrtroupis@troupislawoffice.com>

Cc: adamfoltz@gmail.com, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

Jim Troupis <jrtroupis@troupislawoffice.com>

Mon, Jul 11, 2011 at 6:42 PM

To: tottman <tottman@gmail.com>, adamfoltz@gmail.com, "McLeod, Eric M (22257)"

<EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

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jtroupis@troupislawoffice.com

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From: Jim Troupis [<mailto:jtroupis@troupislawoffice.com>]

Sent: Monday, July 11, 2011 6:41 PM

To: 'Elisa Alfonso'; 'Alonzo Rivas'

Subject: FW: FW: MALDEF WI House Plan, (2nd edition)

Elisa and Alonzo,

I like your proposal. We've taken it a bit further. Here is a comparison of MALDEF's proposal to a suggestion we think might work a bit better. MALDEF's option is shown in color and our suggestion to do the same thing on the same template is shown in outline form as an overlay.

The HVAP numbers under the 2 plans:

MALDEF

AD 8 60.10

AD 9 53.00

Our Alternative

AD 8 60.52

AD 9 54.03

So this takes the same principal and improves it slightly on the numbers. Importantly, the MALDEF proposal would result in changing at least four other assembly districts in the present legislation, while this alternative would not cause those other unnecessary changes. As a result, I think the legislature could move to your suggestion—with our small changes.

Let us know what you think.

The hearing is on Wens., and if you would be willing to speak on behalf of this, we can then make sure you are on the agenda and the plan is given complete consideration.

Jim

Troupis Law Office LLC

7609 Elmwood Ave

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Middleton, WI 53562

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jrtroupis@troupislawoffice.com

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From: Elisa Alfonso [mailto:ealfonso@MALDEF.org]
Sent: Monday, July 11, 2011 4:50 PM
To: 'Jim Troupis'
Cc: Alonzo aRivas
Subject: FW: MALDEF WI House Plan, (2nd edition)

Jim,

As promised, here is the MALDEF map we discussed this afternoon.

15/11

If you have any questions, please let us know.

Elisa

 **Comparison of 64-50 maps.pdf**
64K

Jim Troupis <jrtroupis@trouplawoffice.com>

Tue, Jul 12, 2011 at 12:00 PM

To: tottman@gmail.com, adamfoltz@gmail.com, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, rptaffora@michaelbest.com

James R. Troupis

Troupis Law Office LLC

jrtroupis@trouplawoffice.com

ph. [608-807-4096](tel:608-807-4096)

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contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

From: Elisa Alfonso [mailto:ealfonso@MALDEF.org]
Sent: Tuesday, July 12, 2011 11:41 AM
To: Jim Troupis; Alonzo Rivas
Subject: Re: FW: MALDEF WI House Plan, (2nd edition)

Jim,
Alonzo is out this morning and won't be back until this afternoon.

In regards to the MALDEF map, we will go with the recommendation you made last night.

As for tomorrow, we are unfamiliar with the process. Does it have to be oral testimony or can it be written? Any suggestions you can give us will be greatly appreciated.

We definitely need to speak today. Please let us know when you think we can have a call after your meetings.

Thank you.

Sent via BlackBerry by AT&T

From: Jim Troupis <jrtroupis@troupislawoffice.com>
Date: Tue, 12 Jul 2011 10:35:56 -0500
To: Elisa Alfonso<ealfonso@MALDEF.org>; Alonzo Rivas<Arivas@MALDEF.org>
Subject: RE: FW: MALDEF WI House Plan, (2nd edition)

Elisa,

I am meeting with legislative leaders this afternoon. Can we talk later this morning? The hearing will be tomorrow at 10 a.m. in Madison, and so, to the extent we can, we would like to insure that the concerns of the Latino community are addressed. This morning I asked staff to consult with our Legislative Reference Bureau on these alternatives as they must ultimately draft any amendment.

Let me know what works.

Jim

James R. Troupis

Troupis Law Office LLC

jtroupis@troupislawoffice.com

ph. [608-807-4096](tel:608-807-4096)

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From: Jim Troupis [mailto:jtroupis@troupislawoffice.com]

Sent: Monday, July 11, 2011 6:41 PM

To: Elisa Alfonso; Alonzo Rivas

Subject: FW: FW: MALDEF WI House Plan, (2nd edition)

Elisa and Alonzo,

I like your proposal. We've taken it a bit further. Here is a comparison of MALDEF's proposal to a suggestion we think might work a bit better. MALDEF's option is shown in color and our suggestion to do the same thing on the same template is shown in outline form as an overlay.

The HVAP numbers under the 2 plans:

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AD 9 54.03

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unnecessary changes. As a result, I think the legislature could move to your suggestion—with our small changes.

Let us know what you think.

The hearing is on Wens., and if you would be willing to speak on behalf of this, we can then make sure you are on the agenda and the plan is given complete consideration.

Jim

Troupis Law Office LLC

7609 Elmwood Ave

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From: Elisa Alfonso [mailto:ealfonso@MALDEF.org]
Sent: Monday, July 11, 2011 4:50 PM
To: 'Jim Troupis'
Cc: Alonzo aRivas
Subject: FW: MALDEF WI House Plan, (2nd edition)

Jim,

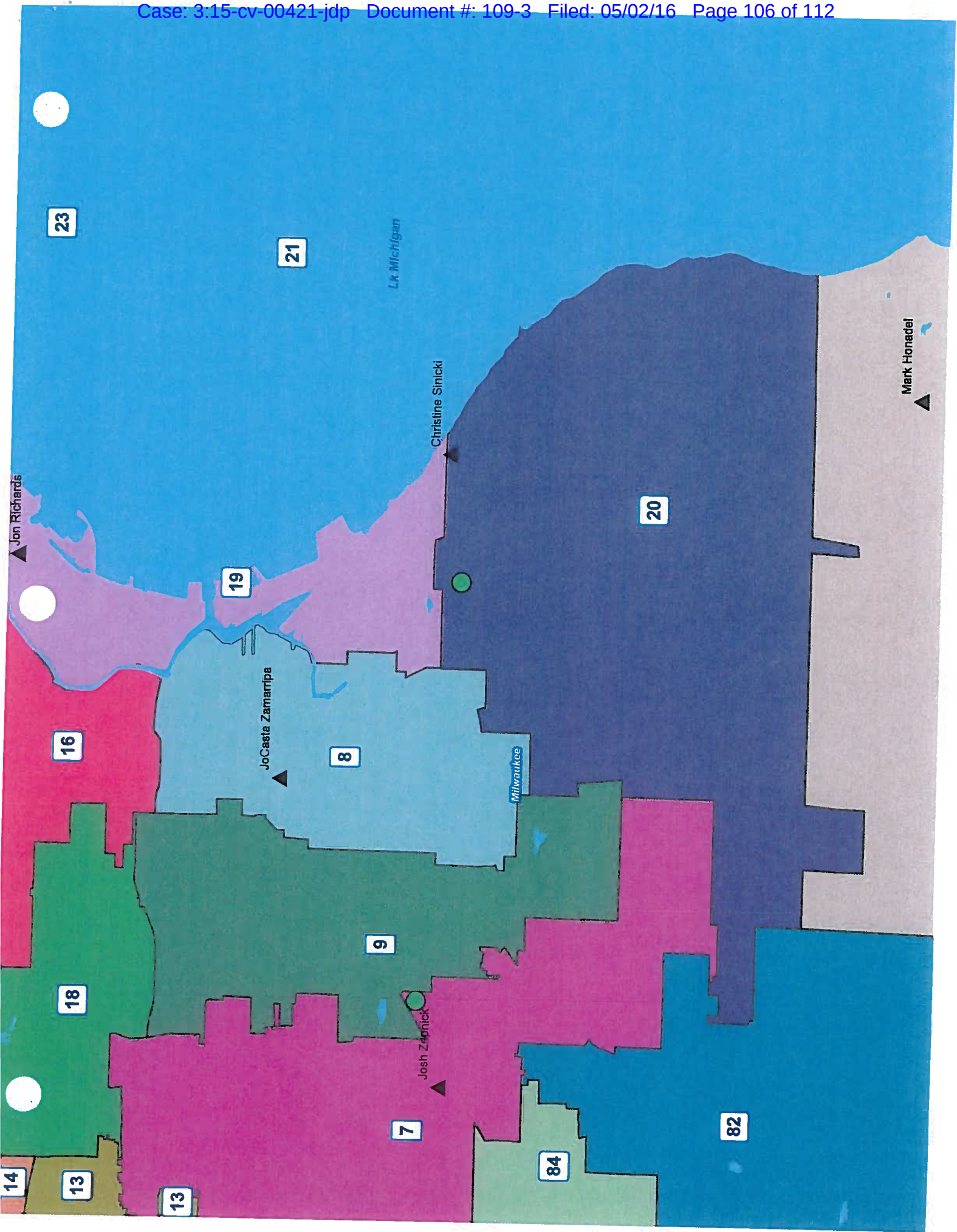
As promised, here is the MALDEF map we discussed this afternoon.

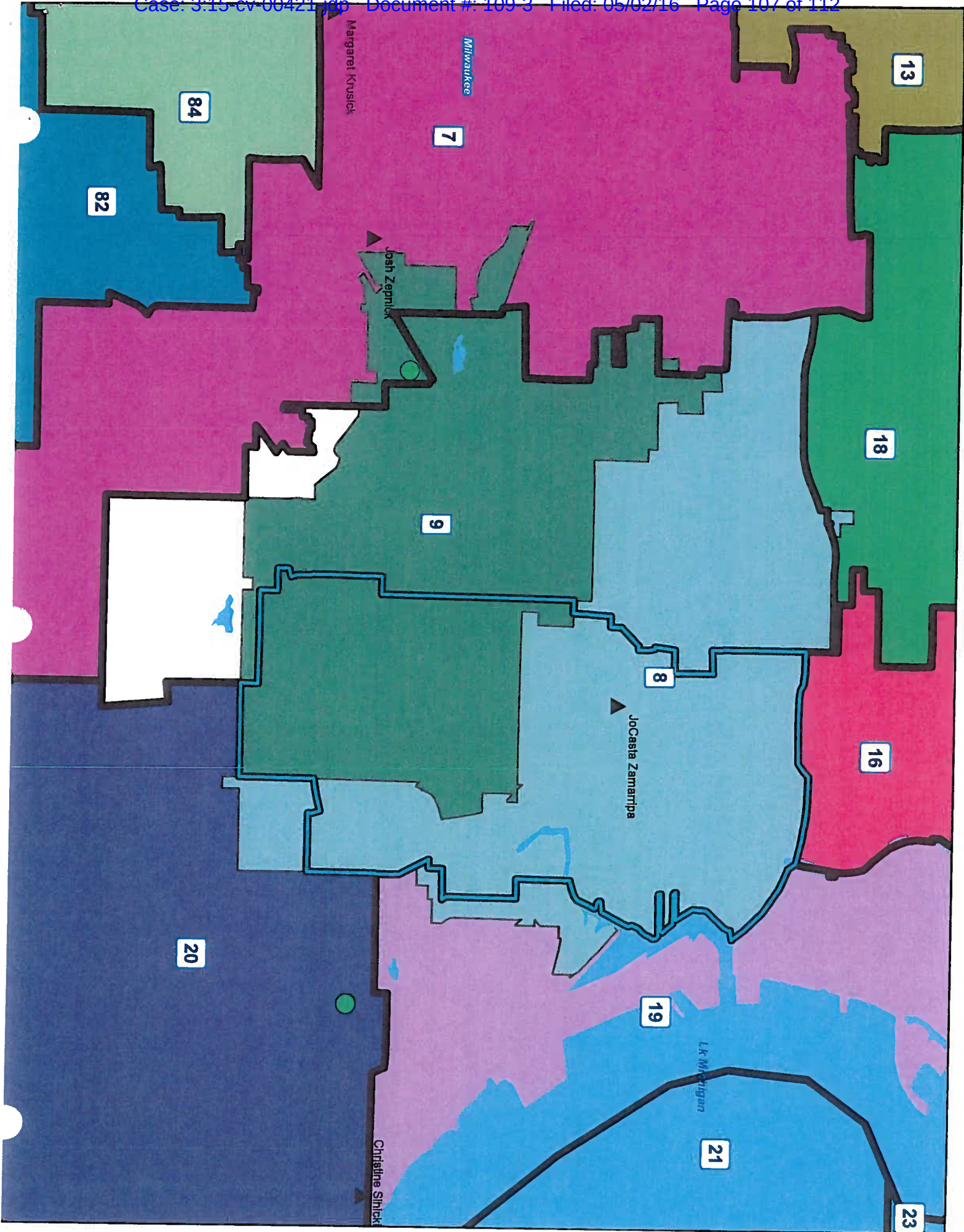
If you have any questions, please let us know.

Elisa

Email - FW: MALDEF WI House Plan, (2nd edition)









Adam Foltz <adamfoltz@gmail.com>

Wisconsin Hispanic Districts

tottman <tottman@gmail.com>

Sun, Jul 17, 2011 at 11:40 AM

To: Keith Gaddie <rkgaddie@ou.edu>

Cc: adam foltz <adamfoltz@gmail.com>, Jim Troupis <jrtroupis@troupislawoffice.com>, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, "Taffora, Raymond P (22244)" <rptaffora@michaelbest.com>

Keith,

Jim Troupis asked that I have you take a look at the amendment that was adopted in committee on the hispanic districts. Here is the link to the interactive maps: <http://legis.wisconsin.gov/ltsb/redistricting/bills.htm>

Amendment 2 was the configuration that was adopted. The HVAP in AD 8 is 60.5 % and in AD 9 it is 54%. The incumbent lives in AD 8 and AD 9 is open under all alternatives.

There was testimony by 2 different hispanic groups in favor of the configuration in amendment 2. No one that I'm aware of testified in favor of either the bill configuration (AD 8 HVAP 57.2%, AD 9 HVAP 57.2%) or in favor of amendment 1 (AD 8 HVAP 64%, AD 9 HVAP 50%).

Jim was going to call you later today to get your thoughts if you have a chance to take a look at the amendment.

Thanks,

Tad Ottman



Adam Foltz <adamfoltz@gmail.com>

Wisconsin Hispanic Districts

Gaddie, Ronald K. <rkgaddie@ou.edu>

Sun, Jul 17, 2011 at 1:18 PM

To: tottman <tottman@gmail.com>

Cc: adam foltz <adamfoltz@gmail.com>, Jim Troupis <jrtroupi@troupi.slawoffice.com>, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, "Taffora, Raymond P (22244)" <rptaffora@michaelbest.com>

I will look at them and can talk after 5pm. There are other items I need to clear off the desk before I am free to visit.

Ronald Keith Gaddie
Professor of Political Science
Editor, Social Science Quarterly
The University of Oklahoma
455 West Lindsey Street, Room 222
Norman, OK 73019-2001
Phone [405-325-4989](tel:405-325-4989)
Fax [405-325-0718](tel:405-325-0718)
E-mail: rkgaddie@ou.edu
<http://faculty-staff.ou.edu/G/Ronald.K.Gaddie-1>
<http://socialsciencequarterly.org>

From: tottman [tottman@gmail.com]

Sent: Sunday, July 17, 2011 11:40 AM

To: Gaddie, Ronald K.

Cc: adam foltz; Jim Troupis; McLeod, Eric M (22257); Taffora, Raymond P (22244)

Subject: Wisconsin Hispanic Districts

[Quoted text hidden]



Adam Foltz <adamfoltz@gmail.com>

Revised timing

Gaddie, Ronald K. <rkgaddie@ou.edu>

Sun, Jul 17, 2011 at 1:33 PM

To: tottman <tottman@gmail.com>

Cc: adam foltz <adamfoltz@gmail.com>, Jim Troupis <jrtroupis@troupislawoffice.com>, "McLeod, Eric M (22257)" <EMMcLeod@michaelbest.com>, "Taffora, Raymond P (22244)" <rptaffora@michaelbest.com>

I am ready to talk.

Ronald Keith Gaddie
Professor of Political Science
Editor, Social Science Quarterly
The University of Oklahoma
455 West Lindsey Street, Room 222
Norman, OK 73019-2001
Phone 405-325-4989
Fax 405-325-0718
E-mail: rkgaddie@ou.edu
<http://faculty-staff.ou.edu/G/Ronald.K.Gaddie-1>
<http://socialsciencequarterly.org>

From: tottman [tottman@gmail.com]**Sent:** Sunday, July 17, 2011 11:40 AM**To:** Gaddie, Ronald K.**Cc:** adam foltz; Jim Troupis; McLeod, Eric M (22257); Taffora, Raymond P (22244)**Subject:** Wisconsin Hispanic Districts

Keith,

Jim Troupis asked that I have you take a look at the amendment that was adopted in committee on the hispanic districts. Here is the link to the interactive maps: <http://legis.wisconsin.gov/ltsb/redistricting/bills.htm>

Amendment 2 was the configuration that was adopted. The HVAP in AD 8 is 60.5 % and in AD 9 it is 54%. The incumbent lives in AD 8 and AD 9 is open under all alternatives.

There was testimony by 2 different hispanic groups in favor of the configuration in amendment 2. No one that I'm aware of testified in favor of either the bill configuration (AD 8 HVAP 57.2%, AD 9 HVAP 57.2%) or in favor of amendment 1 (AD 8 HVAP 64%, AD 9 HVAP 50%).

Jim was gong to call you later today to get your thoughts if you have a chance to take a look at the amendment.

Thanks,

Tad Ottman

DISTRICT	2006						2008						2010					
	Contested (Major Party)		Contested (All)	Indp. Incum.	2006 Result		Contested (Major Party)		Contested (All)	Indp. Incum.	2008 Result		Contested (Major Party)		Contested (All)	Indp. Incum.	2010 Result	
	Incumbency						Incumbency						Incumbency					Incumbency
1	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
2	1	1	1	0	R		1	0	0	0	D		-1	0	0	R		
3	1	0	0	0	R		1	0	0	0	R		1	1	1	R		
4	1	0	0	0	R		1	0	0	0	R		0	0	0	R		
5	-1	0	0	0	D		-1	0	0	0	D		0	0	0	R		
6	0	0	0	0	R		1	0	0	0	R		1	1	1	R		
7	-1	-1	-1	0	D		-1	0	0	0	D		-1	0	0	D		
8	-1	-1	-1	0	D		-1	-1	0	0	D		-1	-1	0	D		
9	-1	-1	-1	0	D		-1	-1	0	0	D		-1	-1	0	D		
10	-1	-1	-1	0	D		-1	-1	0	0	D		0	-1	0	D		
11	-1	-1	-1	0	D		-1	-1	0	0	D		-1	-1	0	D		
12	-1	-1	-1	0	D		-1	-1	0	0	D		-1	0	0	D		
13	-1	0	0	0	D		-1	-1	0	0	D		-1	0	0	D		
14	1	0	0	0	R		1	0	0	0	R		0	1	0	R		
15	-1	-1	-1	0	D		-1	0	0	0	D		-1	0	0	D		
16	-1	-1	-1	0	D		-1	-1	0	0	D		-1	-1	0	D		
17	-1	-1	0	0	D		-1	-1	0	0	D		-1	-1	0	D		
18	-1	-1	-1	0	D		-1	-1	0	0	D		-1	-1	0	D		
19	-1	-1	-1	0	D		-1	-1	0	0	D		-1	0	0	D		
20	-1	-1	-1	0	D		-1	-1	0	0	D		-1	0	0	D		
21	1	1	1	0	R		1	0	0	0	R		1	0	0	R		
22	-1	-1	-1	0	D		0	0	0	0	D		-1	0	0	D		
23	0	0	0	0	R		1	0	0	0	R		1	1	0	R		
24	1	1	1	0	R		0	0	0	0	R		1	0	0	R		
25	-1	0	0	0	D		-1	-1	0	0	D		0	0	1	I		
26	-1	0	0	0	D		-1	0	0	0	D		-1	0	0	R		
27	1	1	1	0	R		1	0	0	0	R		1	1	0	R		
28	1	0	0	0	D		-1	0	0	0	D		-1	0	0	R		
29	0	0	0	0	R		1	0	0	0	R		1	0	0	R		
30	1	0	0	0	R		1	0	0	0	R		0	0	0	R		
31	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
32	1	0	0	0	R		1	0	0	0	R		0	0	0	R		
33	1	0	0	0	R		1	1	1	0	R		0	1	0	R		
34	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
35	1	1	1	0	R		1	0	0	0	R		0	0	0	R		
36	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
37	0	0	0	0	D		-1	0	0	0	D		-1	0	0	D		
38	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
39	1	0	0	0	R		1	0	0	0	R		1	1	0	R		
40	0	0	0	0	R		1	0	0	0	R		1	0	0	R		
41	1	0	0	0	R		1	0	0	0	R		1	0	0	R		
42	1	0	0	0	R		1	0	0	0	R		-1	0	0	D		
43	1	0	0	0	D		-1	0	0	0	D		-1	0	0	R		
44	-1	0	0	0	D		-1	-1	0	0	D		-1	0	0	R		
45	-1	-1	-1	0	D		-1	0	0	0	D		-1	0	0	R		
46	-1	-1	-1	0	D		-1	0	0	0	D		-1	0	0	D		
47	1	0	0	0	R		0	0	0	0	R		1	0	0	R		
48	-1	0	0	0	D		-1	-1	0	0	D		-1	0	0	D		
49	1	0	0	0	D		-1	-1	0	0	D		-1	0	0	C		



Adam Foltz
Documents Responsive to
12/13/11 Subpoena

Foltz
EXHIBIT NO. 26
12/21/11 RPT/SM
For the Record, Inc.
(608) 833-0392



Adam Foltz
Statewide Data Base

Foltz
EXHIBIT NO. 27
12/21/11 RPTB sm
For the Record, Inc.
(608) 833-0392

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, CARLENE BECHEN, ELVIRA BUMPUS, RONALD BIENDSEIL, LESLIE W DAVIS, III, BRETT ECKSTEIN, GLORIA ROGERS, RICHARD KRESBACH, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, JEANNE SANCHEZ-BELL, CECELIA SCHLIEPP, TRAVIS THYSSEN, CINDY BARBERA, RON BOONE, VERA BOONE, EVANJELINA CLEERMAN, SHEILA COCHRAN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD LANGE, and GLADYS MANZANET

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

Case No. 11-CV-562
JPS-DPW-RMD

VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA VARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

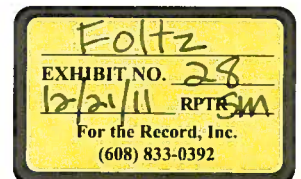
v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

Case No. 11-CV-1011
JPS-DPW-RMD

ORDER



Before WOOD, *Circuit Judge*, DOW, *District Judge*, and STADTMUELLER,
District Judge

This matter comes before the court on two separate motions (Docket #63, #72) to quash third-party subpoenas issued by plaintiffs to Joseph Handrick and Tad Ottman.

On November 28, 2011, Joseph Handrick was served with a subpoena from the plaintiffs calling for his testimony and production of documents, all related to ongoing pretrial discovery. Mr. Handrick is a lawyer employed with Michael Best & Friedrich, LLP, who was hired by the Wisconsin Legislature (“Legislature”) as a consulting expert to provide legal advice related to the development of Wisconsin’s redistricting plan, which is now being challenged in this case. In their subpoena, the plaintiffs demand that Mr. Handrick: (1) produce “any and all documents used by you or members of the Legislature to draw the 2011 redistricting maps”; and (2) appear for a deposition on December 1, 2011. (Docket #64, Ex. 1).

Several days later, on December 4, 2011, Tad Ottman, a legislative aide to Wisconsin State Senate Majority Leader Scott L. Fitzgerald, was served with a subpoena by the plaintiffs. That subpoena requested: (1) “any and all documents, electronically stored information, and tangible things used by you or members of the Legislature to draw the 2011 redistricting maps”; and (2) that Mr. Ottman appear for a deposition on December 7, 2011.

The Wisconsin Assembly and Senate (the “non-parties”) have moved to quash both Mr. Handrick’s and Mr. Ottman’s respective subpoenas. Having received the plaintiffs’ brief opposing the non-parties’ motion to quash Mr. Handrick’s subpoena, the Court believes it has received sufficient

briefing to render its decision on both of the non-parties' motions. For the reasons which follow, the non-parties' motions to quash will be denied.

The information the plaintiffs seek from both Mr. Handrick and Mr. Ottman is relevant. In this case, the plaintiffs make claims under both the Voting Rights Act and the Equal Protection Clause. (*See* Docket #12). And, as the plaintiffs correctly point out, proof of a legislative body's discriminatory intent is relevant and extremely important as direct evidence in both types of claims. (Pl.'s Br. Opp. Mot. Quash, 2-3 (citing *Village of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 265-66 (1977), *Comm. for a Fair & Balanced Map v. Ill. State Bd. of Elections*, No. 11-CV-5065, 2011 U.S. Dist. LEXIS 117656, at *11 (N.D. Ill. Oct. 12, 2011))). Thus, any documents or testimony relating to how the Legislature reached its decision on the 2011 redistricting maps are relevant to the plaintiffs' claims as proof of discriminatory intent.

From the record before the court, it is apparent that attorney-client privilege has no application to the communications between the Legislature and Mr. Handrick. To be sure, the attorney-client privilege protects communications made from a client to an attorney who is acting as an attorney, but does not cover communications seeking only consulting service. *See Sandra T.E. v. S. Berwyn Sch. Dist. 100*, 600 F.3d 612, 618 (7th Cir. 2009), *In re Grand Jury Proc.*, 220 F.3d 568, 571 (7th Cir. 2000). Despite Mr. Handrick's being a lawyer, the defendants state that he performed consulting work in connection with the redistricting legislation. (Defs.' Mot. Quash Handrick, 2) (stating "Handrick provided consulting services in connection with the undersigned firm's representation of the State Senate and State Assembly."). Because, as the defendants acknowledge, Mr. Handrick acted as a consultant,

the Court finds that his communications are not covered by attorney-client privilege.

Similarly, legislative privilege does not protect any documents or other items that were used by the Legislature in developing the redistricting plan. First, and most importantly, the Court finds it all but disingenuous for the Legislature to argue that these items be subject to privilege in a Court proceeding determining the constitutionality of the Legislature's actions, when the Legislature clearly did not concern itself with maintaining that privilege when it hired outside consultants to help develop its plans. The Legislature has waived its legislative privilege to the extent that it relied on such outside experts for consulting services. *Comm. for a Fair & Balanced Map*, 2011 U.S. Dist. LEXIS 117656, at *35. And, even without that waiver, the Court would still find that legislative privilege does not apply in this case. Legislative privilege is a qualified privilege that can be overcome by a showing of need. *Id.*, at *24-*25. Allowing the plaintiffs access to these items may have some minimal future "chilling effect" on the Legislature, but that fact is outweighed by the highly relevant and potentially unique nature of the evidence. *Id.*, at *25-*26. Additionally, given the serious nature of the issues in this case and the government's role in crafting the challenged redistricting plans, the Court finds that legislative privilege simply does not apply to the documents and other items the plaintiffs seek in the subpoenas they have issued. *Id.*

The remainder of the non-parties' arguments, all of which are procedural, fail or can easily be cured. As the plaintiffs correctly note, Mr. Handrick was not employed by a *party* to this case, but instead by the Legislature, and he is, therefore, not excused from testifying under Rule

26(b)(4)(D). Fed. R. Civ. P. 26(b)(4)(D) (limiting a party's ability to depose "an expert who has been retained or specifically employed by another party in anticipation of litigation...").

Next, while the initial subpoenas provided a potentially-inadequate time to comply under Rule 45(c)(2)(B), that problem has been substantially cured by the Court's delay while awaiting briefs. Having missed both requested deposition dates, the plaintiffs will now have to reschedule those depositions for a later time. Given the expedited schedule in this case, it is important for the parties to have a shortened turnaround between the issuance of a subpoena and the requested date for production and deposition. The Court notes that three days may be an excessively quick turnaround, however, in the future—except in an extraordinary circumstance—it will not find a *five-day* compliance interim to be unreasonable. The Court also adds that it is apparent that the Legislature has had a hand in causing the three-day interims by apparently refusing to accept service on behalf of its staff and consultants. Considering the need for a quick turnaround in this case, the Court fully expects that the Legislature and its staff, consultants, and members, will cooperate with the efforts of the Court and the parties to expeditiously complete discovery.

Finally, the plaintiffs' overly-broad production requests and failure to include a recording method may easily be cured. Perhaps as a result of oversight, the plaintiffs may have omitted phrases limiting their discovery requests to documents in Mr. Handrick's and Mr. Ottman's "possession, custody, or control." Accordingly, the Court would suggest that they modify their subpoenas so as to limit their requests and, at the same time, modify the subpoenas to specify the recording method for taking depositions.

Provided the plaintiffs make those changes, the Court finds no reason to quash the subpoenas the plaintiffs have issued to Mr. Handrick and Mr. Ottman. Therefore, the non-parties' motions to quash will be denied.

The Court also recommends that all parties (and non-parties) who consider filing motions to quash read very carefully *Committee for a Fair & Balanced Map*, which the Court has cited extensively in this order. The opinion and order in that case addresses head-on many of the issues raised by the non-parties in their motions to quash. Had the non-parties been aware of that case, perhaps they would not have filed their motions to quash or may have tailored their arguments more effectively. Thus, in this instance the Court will not grant costs and attorneys' fees to the plaintiffs for their defense against these motions.

However, having now brought that case to the non-parties' attention, it should go without saying that the Court will not hesitate to award costs together with actual attorneys' fees related to defending future motions to quash, if the Court deems those motions frivolous or otherwise made in bad faith.

Accordingly,

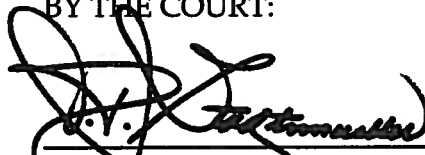
IT IS ORDERED that the non-party movants' motion to quash the plaintiffs' subpoena issued to Joseph Handrick (Docket #63) be and the same is hereby **DENIED**;

IT IS FURTHER ORDERED that the non-party movants' motion to quash the plaintiffs' subpoena issued to Tad Ottman (Docket #72) be and the same is hereby **DENIED**, and

IT IS FURTHER ORDERED that the plaintiffs shall redraft and reissue subpoenas to Joseph Handrick and Tad Ottman which correct any issues related to the overbreadth or recording method attendant to their discovery requests.

Dated at Milwaukee, Wisconsin, this 8th day of December, 2011.

BY THE COURT:

A handwritten signature in black ink, appearing to read "J.P. Stadtmueller", is written over a horizontal line. The signature is stylized and somewhat cursive.

J.P. Stadtmueller
U.S. District Judge

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN, ELVIRA
BUMPUS, RONALD BIENDSEIL, LESLIE W DAVIS,
III, BRETT ECKSTEIN, GLORIA ROGERS, RICHARD
KRESBACH, ROCHELLE MOORE, AMY RISSEEUW,
JUDY ROBSON, JEANNE SANCHEZ-BELL,
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Plaintiffs,

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RONALD KIND,

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the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E.
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Case No. 11-CV-562
JPS-DPW-RMD

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
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Plaintiffs,

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the Wisconsin Government Accountability Board,

Defendants.

Case No. 11-CV-1011
JPS-DPW-RMD

ORDER



Before WOOD, *Circuit Judge*, DOW, *District Judge*, and STADTMUELLER, *District Judge*

The Wisconsin State Assembly and Senate (“the Legislature”) moved this Court, on December 13, 2011, to clarify its prior December 8, 2011 Order, which denied the Legislature’s motion to quash the plaintiffs’ subpoena of Mr. Joseph Handrick. (Docket #63, #74, #77). In seeking clarification, the Legislature points out that Mr. Handrick is not an attorney; the Court had misidentified Mr. Handrick as an attorney in its December 8, 2011 Order. (Docket #74). In fact, Mr. Handrick is a “Government Relations Specialist,” working for the law firm Reinhart Boerner Van Deuren, S.C. (“Reinhart”), who was hired by the Legislature through the law firm Michael Best & Friedrich, LLP (“Michael Best”), which acts as outside counsel to the Legislature. (Docket #77). While the Court appreciates having the benefit of this clarification, it does not change the Court’s analysis. Privilege does not protect Mr. Handrick, items he possesses, or discussions he had with the Legislature’s outside counsel, from the plaintiffs’ discovery request.

In their motion to clarify, perhaps better described as a motion for reconsideration, the Legislature argues that the Court incorrectly denied Mr. Handrick’s entitlement to privilege. First, the Legislature argues that Michael Best retained Mr. Handrick in anticipation of litigation, and thus his opinions and conclusions should be considered work product. (Non-Parties’ Mot. to Clarify, 3 (citing *Marylanders for Fair Representation v. Schaefer*, 144 F.R.D. 292, 303 (D. Md. 1992))). Next, the Legislature argues that any of Mr. Handrick’s communications with the Legislature’s outside counsel is privileged (Non-

Parties' Mot. to Clarify, 3-4 (citing *Estate of Chopper v. R. J. Reynolds Tobacco Co.*, 195 F.R.D. 648, 651-52 (N.D. Iowa 2000))).

There are several issues that the Court looks to in resolving these competing matters. First, the Court finds that Mr. Handrick was consulted by the Legislature independently and, therefore, the attorney-client privilege does not apply. "Where a client consults an expert independently, then [attorney-client] privilege will not apply." *Marylanders*, 144 F.R.D. at 303. The Court finds that the Legislature hired Mr. Handrick and, therefore, consulted him independently, as opposed to Michael Best having consulted him. In the engagement letter sent by Reinhart to Michael Best, Reinhart states that it is the firm's understanding that Mr. Handrick's "clients are the Wisconsin State Senate . . . and State Assembly." (Docket #78, Ex. 2). And, in an email sent to Reinhart, Michael Best acknowledges that "the sole responsibility for payment of amounts due to you rests with the Client [the Legislature]." (Docket #78, Ex. 1). So, in fact, the Legislature—with the benefit of taxpayer money—hired Mr. Handrick and paid him \$5,000 per month for his services. (Docket #78, Ex. 2). The Legislature may not shield the opinions and conclusions of an individual hired with taxpayer money, simply by funneling the hiring of that individual through outside counsel. If the Legislature was the client paying Mr. Handrick—a non-lawyer—then his opinions and conclusions are not subject to any work-product or attorney-client privilege. *See Marylanders*, 144 F.R.D. at 303. As such, having found the Legislature to be Mr. Handrick's client, the Court finds that attorney-client privilege does not apply to Mr. Handrick's opinions and conclusions.

Next, the Court concludes that Mr. Handrick's work-product is not privileged. If the Legislature did not retain Mr. Handrick in anticipation of litigation, then his work-product is not privileged. *Id.* While the Legislature may have reasonably believed that litigation would result from its redistricting efforts, the Court declines to hold that Mr. Handrick's work-product is privileged. To do so would be a slap in the face to Wisconsin's citizens: essentially, the Court would be saying that the Legislature could shield all of its actions from any discovery. The Legislature could *always* have a reasonable belief that *any* of its enactments would result in litigation. That is the nature of the legislative process: it often involves contentious issues that the public may challenge as being unconstitutional. As such, if the Legislature wished to obscure its legislative actions from the public eye then, conceivably, all it would need to do would be to retain counsel or other agent that it termed to be "in anticipation of litigation." The Court is unwilling to travel that road, for it would "be both unseemly and a misuse of public assets" to permit an individual hired with taxpayer money "to conceal from the taxpayers themselves otherwise admissible evidence" of allegedly unconstitutional motives affecting their voting rights. *See In re Witness Before the Special Grand Jury 2000-2*, 288 F.3d 289, 293 (7th Cir. 2002) (discussing a state lawyer's refusal to discuss an officeholder's wrongdoing in a criminal case; while the comparison of Mr. Handrick to a state lawyer is not exact, the Court finds it close enough to reach the seed of the court's concern in *In Re Witness*). Thus, the Court relies on a principle widely accepted in insurance law (another context in which litigation could reasonably be anticipated at nearly any point): "[m]aterials prepared in the ordinary course of a party's

business,” — here, the Legislature enacting laws — “even if prepared at a time when litigation was reasonably anticipated, are not work product.” *Continental Cas. Co. v. Marsh*, No.01-0160, 2004 WL 42364, at *8 (N.D. Ill. Jan. 6, 2004) (citing *Harper v. Auto-Owners Ins. Co.*, 138 F.R.D. 655, 661 (S.D. Ind. 1991)); see also *Dawson v. New York Life Ins. Co.*, 901 F.Supp. 1362 (N.D. Ill. 1995), *Sec. Exch. Comm’n v. Credit Bancorp, Ltd.*, No. 99-CIV-113951RWS, 2002 WL 59418, at *2 (S.D.N.Y. Jan. 16, 2002). Because the Legislature can always anticipate litigation, and the Court will not act to conceal the Legislature’s actions from the public, the Court finds that Mr. Handrick’s work product is not protected by privilege.

Finally, the Court finds that privilege does not afford protection to Mr. Handrick’s communications with the Legislature’s outside counsel. The Legislature argues that Mr. Handrick’s communications with Michael Best are not discoverable. (Non-Parties’ Mot. to Clarify, 3–4 (citing *Estate of Chopper*, 195 F.R.D. at 651–52)). As a threshold matter, the Court notes that the case cited by the Legislature for the very broad assertion that Mr. Handrick’s communications with outside counsel are privileged is but marginally applicable to the case at hand. The case cited by the Legislature deals only with work product given by a party’s attorneys to an expert retained in preparation of litigation. *Estate of Chopper*, 195 F.R.D. at 650–51. Thus, there are two incongruities between *Estate of Chopper* and the case at hand: (1) here, the asserted privilege would cover the work product of a non-party’s attorneys, as opposed to a party’s attorneys; and (2) as discussed above, the Court has found that Mr. Handrick was not retained in anticipation of litigation. Further, the Legislature relies on *Estate of*

Chopper—a case decided by a district court of the Eighth Circuit—for a contention that has been resolved in an opposite way by one of the Seventh Circuit’s own district courts: in *Karn v. Ingersoll-Rand Co.*, our sister court held that Rule 26(a)(2) “trumps” any assertion of work product or privilege, and thus “all materials given to an expert should be disclosed.” Compare *Karn v. Ingersoll-Rand Co.*, 168 F.R.D. 633, 639 (N.D. Ind. 1996) (citing Michael E. Plunkett, *Discoverability of Attorney Work Product Reviewed by Expert Witnesses: Have the 1993 Revisions to the Federal Rules of Civil Procedure Changed Anything?*, 69 Temple L.Rev. 451, 479 (1996)), with *Estate of Chopper*, 195 F.R.D. at 651–52 (decision of Northern District of Iowa, a district court in the Eighth Circuit). Thus, to the limited extent *Estate of Chopper* may apply to this case, there is contrary—and undisclosed—case law that exists in this Circuit that the Court finds more persuasive.

Going even further, a district court in this Circuit has held that “documents concerning ‘advice on political, strategic or policy issues...would not be shielded from disclosure by the attorney-client privilege.’” *Evans v. City of Chicago*, 231 F.R.D. 302, 312 (N.D. Ill. 2005) (citing *In re Lindsey*, 148 F.3d 1100, 1106 (D.C. Cir. 1998), *Republican Party of North Carolina v. Martin*, 136 F.R.D. 421, 426 (E.D.N.C. 1991)). So, even if *Estate of Chopper* did apply, it does not appear to cover any documents passed between Mr. Handrick and the Legislature’s outside counsel that concerned advice on political, strategic, or policy issues. Considering Mr. Handrick’s lack of any legal qualifications, the Court is unsure why he would be offered any documents other than those containing such advice.

All told, the Legislature has presented no compelling legal reason why the discussions between Mr. Handrick and Michael Best's attorneys should be privileged. Likewise, in the Court's own research, it has not identified any reason to extend privilege to that information. Accordingly, the Court holds that privilege does not protect the communications between Mr. Handrick and outside counsel hired by the Legislature.

One additional factor also supports the Court's ultimate conclusion that no privilege applies to protect Mr. Handrick, his opinion and conclusion, or his communications with the state's outside counsel. "Certainly, if...[a consulting expert] was an active participant in the events which form the subject matter of this litigation, they are entitled to whatever discovery of him they may deem appropriate." *Marylanders*, 144 F.R.D. at 303. While the Court remains uncertain of the full extent to which Mr. Handrick participated in development of the redistricting legislation that underlies this litigation, evidence seems to make clear that he participated as a lobbyist and was thus an active participant in the redistricting. Mr. Handrick does not have a law degree or any degree in political science or statistics; his only qualifications appear to be his prior service as a member of the State Assembly. As such, the Court finds it likely that Mr. Handrick was an active lobbying participant in the redistricting, entitling the plaintiffs to whatever discovery of him they may deem appropriate under the rules of evidence. *Id.*

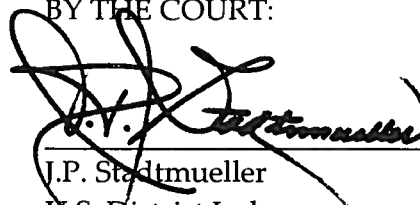
Accordingly,

IT IS ORDERED that the motion of the Wisconsin State Assembly and the Wisconsin State Senate to clarify (Docket #77) be and the same is **GRANTED** in part, to clarify the fact that Mr. Handrick is not an attorney and is employed by Reinhart Boerner Van Deuren, S.C.;

IT IS FURTHER ORDERED that the motion of the Wisconsin State Assembly and the Wisconsin State Senate to clarify (Docket #77) be and the same is **DENIED** in part, to the extent that those parties seek application of privilege to shield Mr. Handrick from discovery; as discussed above, privilege does not apply to Mr. Handrick, his work product, or his discussions with the outside counsel of the State Assembly and State Senate.

Dated at Milwaukee, Wisconsin, this 20th day of December, 2011.

BY THE COURT:



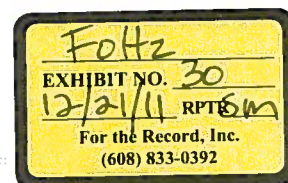
J.P. Stadtmueller
U.S. District Judge

EXPERT REPORT OF RONALD KEITH GADDIE, Ph.D.

Submitted in

Baldus, et al., v. Brennan, et al. 2:2011cv00562 (E. D. Wisc.)

December 13 2011



1. My name is Ronald Keith Gaddie. I reside at 3801 Chamberlyne Way, Norman, Oklahoma, 73072. I have been retained as an expert to provide analysis of the Wisconsin Assembly and Senate districts by counsel for the members of the Wisconsin Government Accountability Board and its executive director. I am being compensated at a rate of \$300.00 per hour. I am a tenured professor of political science at the University of Oklahoma. I teach courses on electoral politics, research methods, and southern politics at the undergraduate and graduate level. I am also the general editor (with Kelly Damphousse) of the journal *Social Science Quarterly*. I am the author or coauthor of several books, journal articles, law review articles, and book chapters and papers on aspects of elections, including most recently *The Triumph of Voting Rights in the South*. In the last decade I have worked on redistricting cases in several states, and I provided previous expert testimony on voting rights, redistricting, and statistical issues. I have also testified in trials or provided expertise to defendants, plaintiffs, intervenors, and jurisdictions in California, Florida, Georgia, Illinois, Louisiana, Maryland, New Mexico, New York, Oklahoma, South Dakota, Texas, Virginia, Wisconsin, and Wyoming, and appeared as an expert witness before committees of the U.S. House, the U.S. Senate, and the U.S. Commission on Civil Rights. Since 2008 I have testified in person or via affidavit in *Lepak v. City of Irving* 3:10-cv-00277 (N.D. Tex.); *Egolf, et al. v. Duran, et al* D-101-CV-2011-02942 (1st Jud. Dist. N.M.); and *Fletcher v. Lamone*, No. 8:11-CV-03220 (D. Md.). A complete list of my cases and retentions appears along with my academic background and list of publications in my attached vita (Exhibit A).

Signature:



Ronald Keith Gaddie
December 13, 2011

2. This report describes: equal population treatment; racial fairness and treatment of minority majority districts; delayed voting effects; treatment of political subdivisions (counties and municipalities); compactness; core constituency retention; pairing of incumbents in the Assembly and Senate districts in Act 43 of the Wisconsin Legislature; and the general features of Act 44, the U.S. Congressional district map for the state of Wisconsin.

3. Equal population treatment

The "One-Person, One-Vote" criterion looms largest in the redistricting literature and case law. The standard, initially advanced in the *Baker v. Carr* and later given name in *Gray v. Sanders*, started the reapportionment revolution. Wisconsin's 1992 and 2002 state legislative maps were crafted by the federal court. The most recent map is a legislative product. Tables 1 and 2 show

population deviation data for Assembly and Senate maps, respectively, since 1992.

The 1992 Assembly plan met a 1% standard (+/-0.5%) with an overall range of deviation of 0.91 percent, with 48 districts below the ideal and 51 above the ideal. Only one district was more than a half point away from the idea. In the Senate, the 1992 plan had an overall deviation range 0.52% with 15 districts above the ideal population and 18 below the ideal. The 2002 Federal court map had an overall range of 1.59 percent, with 47 districts above the ideal, 51 below the ideal, and one exactly apportioned district. In the Senate, the overall deviation range of the 2002 map was 0.98% with 15 districts above the ideal population, 17 below, and one at the perfectly apportioned. Of the 99 Assembly districts in 2002, 77 districts were within +/- 0.5% of the ideal population; in the Senate, 32 of 33 districts fell in this range.

The application of the 2010 census to the existing district boundaries shows many districts outside legally permissible bounds; 44 of 99 Assembly seats had populations more than 5.0% above or below the ideal, as did 11 of 33 Senate districts.

Act 43 rectifies the population variations by drawing 99 Assembly districts that fall within a range of 0.76% (+0.39% to -0.37%); 56 districts are above the ideal population, 41 are below the ideal, and two districts are perfectly apportioned. In the Senate, population variations fall within a range of 0.62% (+0.35% to -0.27%); 17 districts are above the ideal population, 14 are below the ideal, and two districts are perfectly apportioned.

4. Treatment of minority majority districts

African American and Hispanic populations are of approximately equal size in Wisconsin. African Americans are 6.3% of the Wisconsin statewide population and 26.8% of the population of Milwaukee County. The state population is 5.9% Hispanic origin, and Milwaukee County is 13.3% Hispanic. The African American population is largely concentrated in Milwaukee; over 70% of the 358,280 African American Wisconsinites are in the county, and then largely in the City of Milwaukee and north of the East-West Freeway. By comparison, just 37.5% of the 335,532 Hispanic Wisconsinites live in Milwaukee County, and that population has its greatest concentration south of the East-West Freeway.

Of the existing Assembly districts, five are majority African American districts where minority voters elect a candidate of choice (5.05% of seats statewide); of the existing Senate districts, two are majority African American districts where minority voters elect a candidate of choice (6.06% of seats statewide). There is currently one majority Hispanic Assembly seat and no majority Hispanic Senate seats.

As Table 3 shows, Act 43 includes six majority African American Assembly districts and two majority African American Senate districts. Of the six Assembly districts, five are between 60.4% and 61.9% African American voting age population (VAP), and the sixth is 51.5%

African American (VAP). The Act includes two majority Hispanic Assembly districts that are 54.0% Hispanic VAP and 60.5% Hispanic VAP, respectively. No part of Wisconsin is subject to Section 5 of the Voting Rights Act. However if the state were covered by Section 5 the new plan would meet the non-retrogression standard used by the federal government to assess whether a proposal protects minority voting rights. The new Wisconsin Assembly plan not only avoids retrogression, it creates an additional African American district and an additional Hispanic district.

In Milwaukee County, the 2002 court-drawn baseline map had sixteen Assembly districts wholly within the county, and another three districts that crossed the county line; the county population (940,164) would have accommodated seventeen whole districts plus a third of another. African-American majority districts constituted 28.8% of the potential whole districts that could have been crafted in Milwaukee county, compared to 24.6% African American in the county population. African American majority districts were 26.3% of all districts that were wholly or partially in Milwaukee County.

Act 43 had thirteen Assembly districts wholly within the county, and another eight districts that crossed the county line; the county population (947,735) would have accommodated sixteen whole districts plus half of another. African American majority districts constitute 36.4% of the potential whole districts that could have been crafted in Milwaukee county, compared to 26.8% African American in the county population. African American majority districts are 28.6% of all districts that are wholly or partially in Milwaukee County. Under Act 43, Hispanic majority Assembly districts are 2.02% of all districts in the state, 12.1% of potential whole districts that might be drawn in Milwaukee County, and 9.5% of all districts that are wholly or partially in Milwaukee County.

5. Delayed Voting Effects

The Wisconsin legislature enjoys distinct features that must be considered in the evaluation of legislative maps. Each state Senate district is composed of three entire state Assembly districts, so changes in the Assembly districts will necessarily carry through to the Senate districts. The final evaluation of changes to districts for one chamber must be made in the context of how proposed changes affect the districts of the other chamber.

Assembly members serve two-year terms. Senators serve four-year, staggered terms with half elected in presidential years and the other half coincident with gubernatorial elections. Redistricting results in shifts of voters among Senate districts that will result in temporary delayed voting of some voters. Voters who previously resided in even-numbered Senate districts (which vote at in presidential years) but who are moved to odd-numbered Senate districts (which vote in midterm years) by redistricting will go six years without the opportunity to vote for a state senator. In Wisconsin the delayed voting issue is considered significant and is closely related to the fundamental principles of fairness and equality that underlie the dominant

principles of population equality and racial fairness.

The delayed voting effects of the last three redistricting efforts appear in Table 4. In 1992, the map drawn by the Federal District Court moved 257,000 persons (or about 5.25% of all persons in Wisconsin according to the 1990 census) into districts where voters would wait six years between opportunities to vote for state senator. In 2002, the Federal District Court map moved 171,163 persons (3.14% of the state population according to the 2000 census) into districts where voters would have a six-year delayed vote. In 2011, Act 43 moves 299,704 persons (5.26% of all persons in Wisconsin according to the 2010 census) into new districts that result in similar delayed voting. The number of persons per district experiencing delayed voting ranges from a low of 133 to a high of 72,431, with an average for the 17 districts involved of 17,630 persons per district. The number of people with temporarily delayed votes is numerically similar to the number observed in Oklahoma, where the most recent state Senate map moves 299,528 persons (8.0% of the state) to districts where they will be temporarily disfranchised in state Senate elections. I am currently identifying other states with similar staggered senate elections to ascertain if the Wisconsin and Oklahoma delayed voting effects are exceptional or common.

Delayed voting is not without means for the public to redress. Wisconsin is one of nineteen states that allows for recall of state elected officials.¹ This past summer, senators in nine of the sixteen even-numbered Senate districts were subject to recall, meaning that potentially numerous delayed voters who would have waited from 2008 to 2014 for the chance to vote for senator were able to exercise the franchise via recall, and therefore will not wait six years between opportunities to vote again, but only three. A total of 164,843 persons who reside in the districts who would otherwise have delayed voting also lived in districts where a recall was conducted in 2011. Accounting for the use of the recall, the actual period of delayed voting for these 164,843 persons is just three years, not six. Thus, only 134,861 persons endure the six-year voter delay.

6. Treatment of political subdivisions

Cities and counties are creatures of the state (Dillon's Rule). They can be created, consolidated, or eliminated. Wisconsin's Constitution expressly provides that county, municipality, and ward boundaries be preserved, if possible (Wisconsin Constitution, article IV). Some city and county lines must be ignored to comply with equal population standards. The Federal Court Plan of 1992 acknowledged both that preference and a preference for preserving municipal boundaries in particular in the crafting of state legislative maps.

¹ Alaska, Arizona, California, Colorado, Georgia, Idaho, Illinois, Kansas, Louisiana, Michigan, Minnesota, Montana, Nevada, New Jersey, North Dakota, Oregon, Rhode Island, and Washington also have election recall. Virginia has a recall petition, but the recall is made via a recall trial (similar to an impeachment) rather than a vote of the people.

As reported in Table 5, the 1992 Federal Court map for the Assembly split 72 municipalities and the Senate map split 45 municipalities; in 2002, the Federal Court's Assembly map split 50 municipalities and the Senate map split 24 municipalities. Act 43 splits 62 municipalities in the Assembly and 37 in the Senate, which is between the numbers of municipal splits in the previous two court-ordered maps.

The 1992 Federal Court map split 47 counties in the Assembly and 35 in the Senate; in 2002, the Federal Court divided 51 counties in the Assembly and 42 in the Senate. Act 43 splits 58 counties in the Assembly and 46 in the Senate, which continues the pattern of greater numbers of counties getting split over time.

7. Compactness

A variety of statistical measures have evolved to assess compactness, though they usually reduce down to two: indicators of circular shape, and indicators of circular filling.² The two most widely used measures of compactness applied to legislative districts are the Perimeter-to-Area measure and the Smallest Circle score. These measures were regularly offered in post-*Shaw* litigation of the 1990s. And, traditionally, districting plans are assessed in the context of total (average) plan compactness, though the compactness of individual districts is advanced when attempting to lend context to the design of particular districts (illustrations of both measures are in Figure 1.)

The Perimeter-to-Area (PTA) measure compares the relative length of the perimeter of a district to its area. It represents the area of the district as the proportion of the area of a circle with the same perimeter. The score ranges from 0 to 1, with a value of 1 indicating perfect compactness. This score is achieved if a district is a circle. Most redistricting software generates this measure as the Polsby-Popper statistic.

Smallest Circle (SC) scores measure the space occupied by the district as a proportion of the space of the smallest encompassing circle, with values ranging from 0 to 1. A value of 1 indicates perfect compactness and is achieved if a district is a circle. This statistic is often termed the Reock measure by redistricting applications.³

Compactness scores for Act 43 appear in Table 6. The average smallest circle score for the entire Assembly map is .28 (range from .06 to .63). The average perimeter to area score for the

²Richard G. Niemi, Bernard Grofman, Carl Carlucci, and Thomas Hofeller. 1990. "Measuring Compactness and the Role of Compactness Standard in a Test for Partisan and Racial Gerrymandering." *Journal of Politics* 52: 1155-1181; see also H. P. Young. 1988. "Measuring the Compactness of Legislative Districts." *Legislative Studies Quarterly* 13: 105-115.

³Ernest C. Reock, Jr. 1961. "A Note: Measuring Compactness as a Requirement of Legislative Apportionment." *Midwest Journal of Political Science* 5: 70-74.

Assembly map is .28 (range of .05 to .56), and the Senate map has a mean perimeter to area score of .29 (range from .06 to .58). The Assembly compactness scores are marginally lower for Act 43 than for the predecessor, court-crafted plan.⁴

8. Core constituency retention

Core retention measures the extent to which constituencies are maintained or disrupted by a proposed map. There are several ways to measure core constituency retention:

Simple Core Retention: How much of district #X in the old map continues into district #X in the new map? (#X old/ N new) This approach is potentially problematic if there has been a radical renumbering of the districts. This can be used with confidence only if there is a conscious effort to keep district numbers attached to geographic areas. This almost necessarily entails giving each incumbent a district. In this instance the measure would closely correspond to incumbent-oriented core retention.⁵

Largest Constituency Core Retention: In the new district, what is the largest proportion in the district that was previously together in one particular, previous district? (Figures for this retention appear in Table 7).

Incumbent Core Retention: In the Incumbent's new district, what proportion of the population comes from their old district? (Figures for this retention appear in Table 8).

The average largest core retention is 66.35% in the Assembly, with a low of 30.88% and a high of 99.91%, as reported in Table 7. The average Senate core retention is 78.82% with a low of 57.89% and a high of 99.92%.

Average incumbent core retention reported in Table 8 is lower than the average for the largest core retention shown in Table 7. In the Assembly, average incumbent core retention is 61.65%, with a low of 8.55% and a high of 99.91%. The average core retention for Democratic incumbents is 54.6%, and 65.86% for Republican incumbents. The lowest Democratic incumbent core is 8.55%, the highest is 99.91%; for Republicans, the low is 17.74% and the high

⁴ The 2002 compactness scores and Senate smallest circle scores could not be generated in time for the submission of this report. They will be provided as soon as they are ready.

⁵ An example of the limitations of this measure is the 1992 Georgia congressional redistricting. In that redistricting, in which Georgia gained a seat, the district of incumbent congressman Newt Gingrich (R-6) was completely dismantled, and a new district 6 created that contained none of the old district's population. Gingrich did "follow the number" and ran successfully in the new district 6.

is 97.67%.

In the Senate, average incumbent core retention is 78.23%, with a low of 42.03% and a high of 99.92%. Democratic incumbent core retention averages 78.84%, compared to 77.64% for Republican incumbents. The low Democratic incumbent score is 42.03%, the high is 99.53%. Among Republican incumbents, the low is 57.97%; the high is 99.92%.

9. Incumbent pairings

There are a total of 11 Assembly pairings involving 22 incumbents. Of these pairings, three involve two Democrats; three involve two Republicans; and five involve bipartisan pairings. The incumbent pairings and the associated core retentions of the involved incumbents appear in Table 9. The Act 43 map contained ten pairings. An additional pairing occurred when Rep. Chris Taylor (D) was elected to Assembly District 48 in a July 2011 special election. Until the result of this election, more Republicans than Democrats were paired under Act 43.

10. Act 44, U.S. Congressional Map

Equal population: Act 44 apportions the 2010 census population of the state of Wisconsin perfectly, into eight districts with a variance of one person. Districts 3, 4, 5, 6, 7, and 8 have a population of 710,873, while districts 1 and 2 have a population of 710,874.

Racial fairness: The total white, non-Hispanic population of Wisconsin is approximately 4,737,259 (.833 * 5,686,986 total persons). There are approximately 949,727 persons who are not Anglo whites in the state. Of these, 358,280 are African American; 335,532 are Hispanic; 130,801 are Asian American; and 56,869 are American Indians. The greatest concentration of minority voters is in Milwaukee County, where there are 514,620 non-Hispanic whites, there are approximately 253,993 African Americans; 126,048 Hispanics; 32,333 Asian Americans; and 6,634 American Indians. No one of these minority groups is sufficiently numerous to constitute the majority of a single congressional district. Act 44 maintains congressional district 4 in Milwaukee County in a configuration that includes 110,488 Hispanics and 285,413 other non-Hispanic minority voters, primarily African Americans. Hispanics make up 15.54% of the district population and other minorities make up 40.15% of the district population, for a total racial, ethnic and linguistic population that is 55.68% of the district.

Treatment of political subdivisions: The congressional map crafted under Act 44 makes 26 splits in 12 counties. Of the 72 counties in the state, only Milwaukee County (947,735) is large enough to wholly contain a congressional district. The county splits are as follows:

Chippewa: 3, 7
Dodge: 5, 6
Jackson: 3, 7
Juneau: 3, 7
Milwaukee: 1, 4 (wholly in the county), 5, 6
Monroe: 3, 7
Richland: 2, 3
Rock: 1, 2
Walworth: 1, 5
Winnebago: 6, 8
Wood: 7, 8
Waukesha: 1, 5

The following municipalities are also split by Act 44. There are a total of 32 split municipalities encompassing 64 splits:

Alma: 3, 7
Anson: 3, 7
Bayside: 4, 6
Beaver Dam: 5, 6
Beliot: 1, 2
Buena Vista: 2, 3
Butler: 4, 5
Clearfield: 3, 7
Dousman: 1, 5
Edson: 3, 7
Germantown: 3, 7
Goetz: 3, 7
Harmony: 1, 2
Hubbard: 5, 6
Janesville: 1, 2
LaGrange: 3, 7
LaPrairie: 1, 2
Libson: 3, 7

Lomira: 5, 6
Milton: 1, 2
New Berlin: 1, 5
Oak Grove: 5, 6
Oshkosk: 6, 8
Rock: 1, 2
Theresa: 5, 6
Tomah: 3, 7
Turtle: 1, 2
Vinland: 6, 8
Waukesha: 1, 5
Whitewater: 1, 2
Winneconne: 6, 8
Wolf River: 6, 8

Core Retention:

All of the congressional districts retain their incumbents, and the incumbents largely retain their districts (see Table 10). The Largest Core and the Incumbent Core are identical. The average core retention for Act 44 is 84.33%, with a high of 96.52% (District 1) and a low of 74.99% (District 5). The average core retention for Democratic incumbents is 83.70%, and 85.36% for Republican incumbents. The lowest Democratic incumbent core is 75.91%, the highest is 91.12%; for Republicans, the low is 74.99% and the high is 96.52%.

Compactness: Compactness scores for Act 44 appear in Table 11. The average smallest circle score is .44; for Republican incumbent districts, the average is .46; for Democratic incumbent districts, the average is .40. The average perimeter to area score is .21; for Republican incumbent districts, the average is .20; for Democratic incumbent districts, the average is .24. The map has increased compactness on the smallest circle score when compared to the previous map, while compactness has decreased on the perimeter to area score.

Pairing of incumbents: No incumbent members of Congress are paired in one district.

11. Conclusion

Act 43 of the Wisconsin Legislature creates districts of substantively equal population in the Assembly and the Senate. These districts are crafted to a variation of less than one percentage point. The Senate map maintains existing African American voting opportunities in the Senate,

and the Assembly map increases by one the number of majority African American Assembly seats, from five to six. The Assembly map also maintains the existing Hispanic opportunity in Milwaukee County and also contains a second district that is majority Hispanic by VAP and which holds out prospects for a second Hispanic opportunity in the future. Both maps are generally compact, adhere to the Wisconsin state requirement to respect county and municipal boundaries, and maintain constituency cores at an average of over 66% in the Assembly and 78% in the Senate. Assembly core retention is lower in the context of incumbency, and lower on average in Democratic incumbent districts than Republican incumbent districts. The Senate map has a delayed voting level of 5.26% -- comparable to the Federal Court map in 1992 -- and subsequent to the summer 2011 recall elections over half of the persons in delayed voting areas resided in areas that had recall elections, and will vote for the Senate again in 2014.

Act 44 creates eight congressional districts with a total population deviation of one person. One of the eight districts is a combined majority minority district, which currently elects an African American incumbent, U.S. Rep. Gwen Moore. The map splits 12 counties and 32 municipalities. Every incumbent member of the delegation is placed in a continuing district and is not paired with another incumbent.

Tables and Figures

Table 1: Population Deviations Under Act 43 for the Wisconsin Assembly

Assembly Deviation	1992 Court*	2002 Court**	2002 Court***	2011 Act 43***
>10.0%	0	0	7	0
5.0 to 10.0%	0	0	13	0
.5 to 4.99%	0	11	23	0
0-.499	51	36	1	56
No deviation	0	1	0	2
0 to -.499	47	40	3	41
-.5 to -4.99	1	11	28	0
-5.0 to -10.0%	0	0	21	0
< -10.0%	0	0	3	0
Low	-0.53%	-0.77%	-15.77%	-0.39%
High	+0.38%	+0.82%	+32.59%	+0.37%
Range	0.91	1.59	48.36	0.76

*1990 Census

**2000 Census

***2010 Census

Table 2: Population Deviations Under Act 43 for the Wisconsin Senate

Deviation	Senate			
	1992 Court*	2002 Court**	2002 Court***	2011 Act 43***
>10.0%	0	0	2	0
5.0 to 10.0%	0	0	3	0
.5 to 4.99%	0	1	9	0
0-.499	15	14	2	56
No deviation	0	1	0	2
0 to -.499	18	17	2	41
-.5 to -4.99	0	0	9	0
-5.0 to -10.0%	0	0	5	0
<-10.0%	0	0	1	0
Low	-0.29%	-0.47%	-11.36%	-0.27%
High	+0.23%	+0.51	+14.82%	+0.35%
Range	0.52	0.98	26.18	0.62

*1990 Census

**2000 Census

***2010 Census

Table 3: Majority-Minority Districts Under Act 43, Assembly and Senate

District	1992 Court		2002 Court		2011 Act 43	
	African American VAP	Hispanic VAP	African American VAP	Hispanic VAP	African American VAP	Hispanic VAP
<u>Assembly</u>						
8		[32.8%]		58.3%	6.8%	60.5
9				[22.9%]	6.9%	54.0%
10	58.7%	4.0%	67.1%		61.8%	3.7%
11	60.2%	1.7%	62.9%		61.9%	3.0%
12	[18.3%]		[32.8%]		51.5%	4.2%
16	58.3%	4.1%	60.5%		61.3%	4.7%
17	59.7%	1.3%	61.9%		61.3%	3.4%
18	59.0%	5.2%	56.7%		60.4%	5.4%
<u>Senate</u>						
4	[45.0%]	2.4%	54.2%		58.4%	
6	59.0%	3.5%	59.6%		61.0%	

[Bracketed] data are notable concentrations of minority voters illuminated by the court.

Sources:

Prosser et al. v. Elections Board et al., 793 F Supp. 859 (W.D. Wis. 1992).
Baumgart et al v. Wendelberg et al and Jensen et al, 02-C-0366 (E.D. Wis. 2002).

Table 4: Senate Delayed voting Effects from Redistricting Under Act 43

	1992 Court	2002 Court	2011 Act 43	2011 Act 43, Net**
Total Displaced Persons	257,000	171,613	299,704	134,861
% of State	5.25%	3.14%	5.26%	2.37%
Per district*	15,117	10,726	17,630	16,857***

Sources:

Prosser et al. v. Elections Board et al., 793 F Supp. 859 (W.D. Wis. 1992).

Baumgart et al v. Wendelberg et al and Jensen et al., 02-C-0366 (E.D. Wis. 2002).

*N = 17 for 1992 and 2011; N = 16 for 2002.

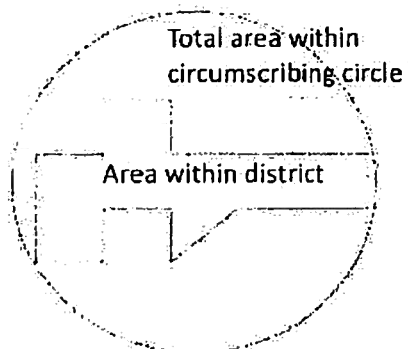
**Net delayed voting accounting for persons in areas that voted in the July and August 2011 recalls.

***Average for the eight districts that did not participate in the 2011 recall elections.

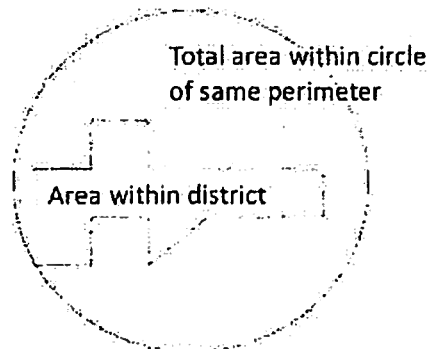
Table 5: County and Municipal Splits Under Act 43

	1992 (U.S. Court)	2002 (U.S. Court)	2011 (Act 43)
Assembly Municipal Splits	72	50	62
Senate Municipal Splits	45	24	37
Assembly County Splits	47	51	58
Senate County Splits	35	42	46

Source: Wisconsin Legislative Reference Bureau;
Baumgart et al v. Wendelberg et al and Jensen et al, 02-C-0366 (E.D. Wis. 2002).



Smallest Circle / Reock



Perimeter to Area / Polsby-Popper

Figure 1: Compactness, illustrated

Table 6: Compactness Scores Under Act 43, Wisconsin Assembly and Wisconsin Senate

	Assembly	Assembly	Senate	Senate
	2002 Map	2011 Map	2002 Map	2011 Map
Smallest Circle				
Average	.41	.39		
Low	.18	.20		
High	.63	.61		
Perimeter-to-area				
Average	.29	.28		.29
Low	.06	.05		.06
High	.58	.56		.58

Table 7: Largest Core Retention Under Act 43, Assembly and Senate Districts

	Assembly	Senate
Average	66.35	78.82
Low	30.88	57.89
High	99.91	99.92

Table 8: Incumbent Core Retention Under Act 43

	Assembly	Senate
Assembly		
Average	61.65%	78.23%
Low	8.55%	42.03%
High	99.91%	99.92%
Democratic Incumbent	54.60%	78.84%
Low	8.55%	42.03%
High	99.91%	99.53%
Republican Incumbent	65.86%	77.64%
Low	17.74%	57.97%
High	97.67%	99.92%

Table 9: Incumbent Pairings Under Act 43, Wisconsin Assembly and Senate

Act 43 District	Incumbent / 2002 District	% Deviation*	% Inc. Core**
Assembly 92	Danou-D, 91	-1.38%	70.84%
	Radcliffe-D, 92	+2.52%	29.16%
Assembly 7	Kiusick-D, 7	-2.82%	30.88%
	Zepnick-D, 9	+5.98%	13.92%
Assembly 76	Pocon-D, 78	-4.20%	67.96%
	Taylor-D, 48	+6.89%	10.45%
Assembly 31	Loudenbeck-R, 45	+3.77%	45.44%
	August-R, 32	+4.72%	26.20%
Assembly 88	Klenke-R, 88	+1.12%	47.89%
	Jacque-R, 2	+6.21%	34.23%
Assembly 89	Nygren-R, 89	+6.21%	82.26%
	Van Roy-R, 90	+2.71%	17.74%
Assembly 33	Jorgensen-D, 37	+2.65%	45.31%
	Nass-R, 31	+7.50%	29.85%
Assembly 14	Cullen-D, 13	-6.23%	31.81%
	Kooyenga-R, 14	-8.34%	35.80%
Assembly 22	Kessler-D, 12	-3.78%	11.79%
	Pridemore-R, 99	+10.98%	35.66%
Assembly 23	Pasch-D, 22	-7.71%	36.14%
	Ott-R, 23	-3.82%	36.92%
Assembly 61	Steinbrink-D, 65	+7.25%	36.07%
	Kerkman-R, 66	+7.18%	63.93%

Senate 21	Wirch-D, 22	+4.46%	57.97%
	Wanggaard-R, 21	-3.25%	42.03%

*Population deviation of the incumbent's previous district under the 2002 Federal Court-drawn map.

**Percentage of the new district that comes from the incumbent's previous district.

Table 10: Core Retention, Congressional Districts, Act 44

District	Total Pop.	Retained Core	Core Percent
1	710,874	686,159	96.52
2	710,874	633,024	89.05
3	710,873	539,603	75.91
4	710,873	647,764	91.12
5	710,873	533,051	74.99
6	710,873	565,950	79.61
7	710,873	538,884	75.81
8	710,873	651,119	91.59
Average	710,873	599,444	84.33
Dem. Avg.	710,873	606,797	83.70
Rep. Avg.	710,873	595,033	85.36

Table 11: Compactness, Congressional Districts, Act 44

District	2002 Map	Act 44	2002 Map	Act 44
	Smallest Circle	Smallest Circle	Perimeter to Area	Perimeter to Area
1	0.47	0.49	0.32	0.31
2	0.56	0.54	0.37	0.43
3	0.33	0.33	0.37	0.17
4	0.30	0.30	0.12	0.13
5	0.53	0.53	0.25	0.24
6	0.38	0.38	0.23	0.16
7	0.53	0.53	0.19	0.16
8	0.40	0.42	0.13	0.11
Average	.42	.44	.25	.21
Dem. Avg.	0.40	0.39	0.29	0.24
Rep. Avg.	0.46	0.47	0.22	0.20

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EDUCATION

Ph.D., Political Science, The University of Georgia, June 1993
M.A., Political Science, The University of Georgia, December 1989
B.S., Political Science, History, The Florida State University, August 1987
A.A., Liberal Arts, The Florida State University, December 1986

ACADEMIC EXPERIENCE

Professor of Political Science, The University of Oklahoma (July 2003-)
Associate Professor (July 1999-June 2003)
Assistant Professor (August 1996-June 1999)
Faculty Fellow, Science and Public Policy Program, Sarkeys Energy Center, the University of Oklahoma (2002- 2004)
Editor (with Kelly R. Damphousse), *Social Science Quarterly*, July 2010-present
Research Assistant Professor of Environmental Health Sciences, Tulane University School of Public Health and Tropical Medicine (September 1994-August 1996); also adjunct Assistant Professor of Political Science, Tulane University (September 1994-August 1996)
Freeport-McMoRan Environmental Policy Postdoctoral Fellow, Tulane University School of Public Health and Tropical Medicine (January 1993-September 1994)
Teaching and Research Assistant, Department of Political Science, The University of Georgia (September 1987-December 1992)

AWARDS, GRANTS, & HONORS

Freeport-McMoRan Post-Doctoral Fellowship, Tulane University, 1993-1994
Coca-Cola Foundation Summer Scholar Faculty Mentor, Tulane University, 1995, 1996
University of Oklahoma Research Council Junior Faculty Research Award (\$6,000), 1997
Junior Faculty Development Fund Research Award (\$540), The University of Oklahoma, 1997
"Guest Coach", University of Oklahoma Football Team, 1997
College of Arts and Sciences Teaching and Research Award (\$875), The University of Oklahoma, 1997-1998

College of Arts and Sciences Summer Research Fellowship (\$6,000), The University of Oklahoma, 1998

Pi Sigma Alpha Best Paper Award, Southwestern Political Science Association Meeting, 1998, 2006

Oklahoma Honors College Undergraduate Research Mentor, Spring 1999

Daily Oklahoman Poll, Co-Principal Investigator with Gary W. Copeland, (\$82,000), 1999-2001

Jewell Prestage Award, for the Best Paper on Gender, Race, Ethnicity, and Political Behavior, Southwestern Political Science Association, 2003

The Order of Kentucky Colonels, conferred August 16 2006

"Guest Coach", University of Oklahoma Women's Basketball Team, 2007

President-Elect, Southwestern Political Science Association, 2006-07

President, Southwestern Political Science Association, 2007-08

Society for Professional Journalists (Oklahoma PRO Chapter) award for "Best Radio Talk Program," 2008, 2009, 2010

Julian J. Rothbaum Award for the outstanding book published by the University of Oklahoma Press, 2009, for *The Triumph of Voting Rights in the South*.

V. O. Key Jr. Award for the outstanding book on Southern Politics (2011) for *The Triumph of Voting Rights in the South*.

PROFESSIONAL CONSULTING AND PARTNERSHIPS

Managing Partner, Intelligent Robotic Solutions LLC, (Oklahoma City, OK) January 2010-present

Consulting Senior Vice-President, Shapard Research LLC (Oklahoma City, OK), January 2009-present

Partner, TVPoll.com PC (Oklahoma City), September 2006-present (consulting expert, June-September 2006)

Partner, Soonerpoltics.com, September 2006-2008 (sole proprietor, May 2004-September 2006)

Consulting expert, Phoenix Consulting (Oklahoma City, OK) September 2005-2007

Consulting expert (*of Counsel*), Wilson Research Strategies (Washington DC, Austin, & Oklahoma City), OK, 2004-2006

Adjunct Professor of Management, Central Michigan University, March 1995-July 1996

Electoral/Demographics, June 1988-December 1992 (Programmer and analyst)

Legislative Aide, Rep. John F. Cosgrove, Florida House of Representatives, April-July 1987

TEACHING

The University of Oklahoma (1996-)

Graduate Courses:

Analysis for Political and Public Administration
Data
Congress in the Political System
Environmental Policy and Administration
Federalism and Intergovernmental Relations
Games, Decisions, and Policy
Intermediate Data Analysis
Legislative Politics
Mass Politics and Realignment
Mediating Political Institutions
Problems in Implementation
Problems in Political Behavior
Public Budgeting and Finance
Public Policy Analysis
Public Policy Problems
Southern Politics
Problems in the Law and Constitution: Voting
Rights

Ph.D. Dissertations:

Scott E. Buchanan. 1999. *Perspectives on the Racial Threat Hypothesis: Testing a Theory of Southern Politics*. Norman, OK: The University of Oklahoma.
Joshua Stockley. 2005. *State Party Organizations as Campaign Service Providers: A Three-State Study of Candidate and Party Perceptions*. Norman, OK: The University of Oklahoma.

Tulane University (1993-1996)

Graduate:

Seminar in Quantitative Research Methods
Environmental Policy and Management

The University of Georgia (1987-1992)

Undergraduate:

American Federal Government

Undergraduate:

American Federal Government
American Federal Government (Honors)
American Political Processes
Environmental Policy and Administration
Freshman Seminar: The Presidential Campaign
Freshman Seminar: Hollywood Politics
Measurement and Analysis for Public
Administration
Politics in America: Generational Politics
Politics in Film
Practical Political Analysis
Public Opinion
Capstone Seminar: American Politics in Film &
Literature
Southern Politics
Voters and Campaigns

Other Supervision:

Approximately sixty-five M.P.A. projects, M.A. project papers, or M.A. theses supervised since 1997. Service on approximately forty Ph.D. committees, including six in communications, seven in economics, one in sociology, four in organizational leadership.

Undergraduate:

American Politics (Honors)
Environmental Politics
Global Environmental Politics (Honors)

Political Science Research Methods

PUBLICATIONS

Books

Charles S. Bullock III and Ronald Keith Gaddie. 2010. *Georgia Politics in a State of Change*. New York: Pearson/Longman.

--2d edition, 2012.

Charles S. Bullock III and Ronald Keith Gaddie. 2009. *The Triumph of Voting Rights in the South*. Norman, OK: The University of Oklahoma Press.

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Ronald Keith Gaddie and Charles S. Bullock, III. 2000. *Elections to Open Seats In The U.S. House: Where the Action Is*. Lanham, Md.: Rowman and Littlefield Press.

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Gary W. Copeland, Ronald Keith Gaddie, and Craig A. Williams. 1998. *The Almanac of Oklahoma Politics 1998*. Stillwater, Oklahoma: OPSA Press. Also published as *Oklahoma Politics: Special Issue*, 6 [1997].

--2d edition, 1999. *The Almanac of Oklahoma Politics 2000*. Edmond, OK, OPSA Press.

--3d edition, 2001. *The Almanac of Oklahoma Politics 2002*. Norman, OK: The Carl Albert Center for Congressional Studies.

James L. Regens and Ronald Keith Gaddie. 1995. *The Economic Realities of Political Reform: Elections and the U.S. Senate*. New York: Cambridge University Press.

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Edited Volumes

Donald P. Haider-Markel, general editor; Michael Card, Ronald Keith Gaddie, Gary Moncrief, Kenneth Palmer, regional editors. 2008. *The Political Encyclopedia of U.S. States and Regions*. Washington, DC: Congressional Quarterly Press.

John C. Kuzenski, Charles S. Bullock, III and Ronald Keith Gaddie (editors). 1995. *David Duke and the Politics of Race in the South*. Nashville: Vanderbilt University Press.

Academic Books In Progress

Ronald Keith Gaddie and Charles S. Bullock III. *DeLayed Democracy: The Texas Redistricting War 2001-2006*. Norman, OK: The University of Oklahoma Press (under contract).

Ronald Keith Gaddie and Bill Shapard. *Red State Rising: The New Oklahoma Politics*. Norman, OK: The University of Oklahoma Press (under contract).

Thomas R. Dye and Ronald Keith Gaddie. 2013. *Politics in America, 10th edition*. New York: Pearson (under contract).

Trade and Popular Books

- Scott Cooper & Keith Gaddie. 2011. *OU Football IQ*. Jacksonville, FL.: Black Mesa Publishing.
- Keith Gaddie. 2010. *Ghosts on Vintners Landing: A Novel*. Jacksonville, FL.: Black Mesa Publishing.
- Keith Gaddie & Kim Gaddie. 2009. *Georgia Football IQ*. Jacksonville, FL.: Black Mesa Publishing.
- David Horne - Daniel Brush - Marc CB Maxwell & Keith Gaddie. 2008. *University of Georgia Football*. New York: Savas Beatie.

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Ronald Keith Gaddie and John William Shapard. 2010. Oklahoma: Red State Rising. In Charles S. Bullock, III and Mark Rozell (eds.) *The New Politics of the Old South (4th)*. Lanham, MD: Rowman and Littlefield Press.

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Ronald Keith Gaddie and Michael D. Jones. 2009. Tennessee: Cracker Barrel Realignment. In Branwell DuBose Kapeluck, Lawrence W. Moreland, and Robert P. Steed, eds., *A Paler Shade of Red: The 2008 Presidential Election in the South*. Fayetteville, AR: University of Arkansas Press.

Ronald Keith Gaddie. 2008. The South. In Donald P. Haider-Markel, editor, *Political Encyclopedia of U.S. States and Regions*. Washington, DC: Congressional Quarterly.

Ronald Keith Gaddie and Michael D. Jones. 2008. New South? Diverse Politics in States of Dynamic Change. In Todd G. Shields and Shannon G. Davis, eds., *New Voices of the Old South: How Women and Minorities Influence Southern Politics*. Tallahassee, FL: Florida State University John Scott Daily Florida Institute of Government

Ronald Keith Gaddie and Michael D. Jones. 2008. Tennessee: A Quiet Sort of Inequality. In Todd G. Shields and Shannon G. Davis, eds., *New Voices of the Old South: How Women and Minorities Influence Southern Politics*. Tallahassee, FL: Florida State University John Scott Daily Florida Institute of Government.

Gary W. Copeland, Rebecca J. Cruise, and Ronald Keith Gaddie. 2006. Oklahoma: Evangelicals and the Secular Realignment. In Charles S. Bullock, III and Mark Rozell (eds.) *The New Politics of the Old South (3d)*. Lanham, MD: Rowman and Littlefield Press.

Charles S. Bullock III, Rebecca J. Cruise, and Ronald Keith Gaddie. 2005. Sessions versus Frost in the Texas 32d District. In Robert Dewhirst and Sunil Ahuja, eds., *The Roads to Congress 2004*. Boca Raton, FL: Nova University Press.

Ronald Keith Gaddie, with Jennifer Christol, Charles Mullin, Katherine Thorne, and Benjamin Wilson. 2005. Issue Advocacy in the 2004 Oklahoma Senate Election. In David Magelby, J. Quin Monson, and Kelly D. Patterson, eds., *Dancing Without Partners: How Candidates, Parties and Interest Groups Interact in the New Campaign Finance Environment*. Provo: Center for the Study of Elections and Democracy.

Ronald Keith Gaddie and Charles S. Bullock, III. 2003. Bob Barr and John Linder (versus Tom Murphy) in Georgia's 7th District. In Sunil Ahuja and Robert Dewhirst (eds.) *The Road to Congress 2002*. Chicago: Wadsworth Publishers.

Robert Dewhirst and Ronald Keith Gaddie. 2003. The 2000 Congressional Elections: Tradition Meets Competition in the New Age. In Robert P. Watson and Colton C. Campbell, Eds., *Campaigns & Elections: Issues, Concepts, and Cases*. Boulder, CO: Lynne Rienner Publishers.

Ronald Keith Gaddie and Gary W. Copeland. 2003. Oklahoma: God and the Grassroots. In Charles S. Bullock, III and Mark Rozell (eds.) *The New Politics of the Old South (2d)*. Lanham, MD: Rowman and Littlefield Press.

Melody Huckaby and Ronald Keith Gaddie. 2001. Carson Defeats Ewing in Oklahoma's 2d District. In Sunil Ahuja and Robert Dewhirst (eds.) *The Road to Congress 2000*. Chicago: Wadsworth Publishers.

Ronald Keith Gaddie and Gary W. Copeland. 2001. Partisan Trends in Oklahoma. In Gary W. Copeland, Ronald Keith Gaddie, and Craig A. Williams (General Editors), *The Almanac of Oklahoma Politics 2002*. Norman, OK: Carl Albert Center for Congressional Studies and Research.

Ronald Keith Gaddie and Donna R. Hoffman. 2001. Critical Events in Contemporary Southern Politics: Dynamic Growth and Partisan Percolations. In John C. Kuzenski, Laurence W. Moreland and Robert P. Steed (eds.). *Eye of The Storm: The South And Congress in an Era of Change*. Westport, CT: Praeger Press.

Ronald Keith Gaddie and Lesli McCollum. 2000. Money and the Incumbency Advantage in US House Elections. In Joseph Zimmerman and Wilma Rule (eds.) *This U.S. House of Representatives: Renovate or Rebuild?* Westport, CT: Praeger Press.

Ronald Keith Gaddie. 1999. Nickles, Defeats Carroll in Oklahoma. In Robert Dewhirst and Sunil Ahuja (eds.) *The Road to Congress 1998*. Chicago: Wadsworth Publishers.

Ronald Keith Gaddie. 1999. Party Building and Republican Growth in Oklahoma. In Gary W. Copeland, Ronald Keith Gaddie, and Craig A. Williams (General Editors). 1999. *The Almanac of Oklahoma Politics 2000*. Edmond, OK: OPSA Press.

Ronald Keith Gaddie and Scott E. Buchanan. 1998. Oklahoma: Realignment in the Buckle of the Bible Belt. In Charles S. Bullock, III and Mark Rozell (eds.) *The New Politics of the Old South: An Introduction to Southern Politics*. Lanham, MD: Rowman and Littlefield Press.

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Ronald Keith Gaddie, David Barnhill, and James L. Regens. 1997. J. Horace McFarland. In Richard Harmond and G. A. Cevalasco, eds., *American Environmentalists: A Selective Autobiographical Encyclopedia, 1850-1990*. New York: Scarecrow Press.

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Charles S. Bullock, III, Ronald Keith Gaddie, and John C. Kuzenski. 1995. The Candidacy of David Duke as a Stimulus to Black Voting. In John C. Kuzenski, Charles S. Bullock, III and Ronald Keith Gaddie (editors), *David Duke and the Politics of Race in the South*. Nashville: Vanderbilt University Press.

Susan A. MacManus and Ronald Keith Gaddie. 1993. Florida. In Leroy Hardy, Alan Heslop, and George S. Blair, eds., *Redistricting in the 1980s: A 50-State Survey*. Claremont, CA: The Rose Institute of State and Local Government.

Charles S. Bullock, III, and Ronald Keith Gaddie. 1993. Georgia. In Leroy Hardy, Alan Heslop, and George S. Blair, eds., *Redistricting in the 1980s: A 50-State Survey*. Claremont, CA: The Rose Institute of State and Local Government.

Charles S. Bullock, III, and Ronald Keith Gaddie. 1991. Changing from Multi-Member to Single-Member Districts: The Florida Case. In Susan A. MacManus, ed., *Reapportionment and Representation in Florida: A Historical Collection*. Tampa: Intrabay Innovation Institute.

Susan A. MacManus and Ronald Keith Gaddie. 1991. Reapportionment in Florida: The Stakes Keep Getting Higher. In Susan A. MacManus, ed., *Reapportionment and Representation in Florida: A Historical Collection*. Tampa: Intrabay Innovation Institute.

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Charles S. Bullock III and Ronald Keith Gaddie. 2006. *An Assessment of Voting Rights Progress in Alabama*. Washington, DC: American Enterprise Institute Policy Series.

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WKY-930AM (Oklahoma City)
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Southern Political Report
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Tulsa World
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Special Contributions, Popular or Editorial Publications

Special contribution to *Roll Call*, "Myths, Realities of Norwood's VRA Amendment" July 13 2006.
Special contribution to *SouthNow* magazine: "Oklahoma: The Republican Realignment Continues" Winter 2004/2005.
Research profile in *USAToday Magazine*, "What if terrorists wipe out congress?" April, 2004.

Regular Contributions, Popular or Editorial Publications and Broadcasts

News contributor and analyst, KWTW-9 (CBS), October 2006-present
News contributor, KGOU-106.3 FM (NPR), Norman, June 2006-present / three-time SPJ award winner for long-format radio (2008, 2009, 2010)
Co-Host, "Tailgate Political Hour with Kyle and Keith", KTLR 890AM, Oklahoma City, September 2006-June 2007
Contributing editor, The McCarville Report, (www.tmrcon.blogspot.com), December 2006-December 2007.
Columnist, the *Oklahoma Gazette* (progressive weekly), October 2005-present
News contributor/permanent guest host, WKY-930 AM (Citadel Broadcasting), Oklahoma City, July 2004-January 2006
Weekly commentator, KTOK-1000 AM/ KTOK.com (Clear Channel), Oklahoma City, April-November 2004
Webmaster and editor, *SoonerPolitics.com* (May 2004-May 2007)
Columnist, *Southern Political Report/ InsiderAdvantage*, November 2005-January 2007

PROFESSIONAL ACTIVITIES AND PUBLIC PRESENTATIONS

Editorial Boards

Editorial Board, *Social Science Quarterly*, 1999-2010; editor (with Kelly R. Damphousse), 2010-present
Editorial Board, *American Review of Politics*, 2002-
Faculty Advisory Board, The University of Oklahoma Press, 2007-present

Manuscript Reviewer

American Journal of Political Science; American Political Science Review, American Politics Quarterly; American Politics Research; American Review of Politics; Electoral Studies, Journal of Politics; Journal of Public Administration Research and Theory, Legislative Studies Quarterly; Policy Studies Journal; Political Research Quarterly; Polity; Public Administration Review, Publius; Social Science Quarterly; Southeastern Political Review; Southern Economic Journal; State and Local Government Review; Western Political Quarterly; Women & Politics; Cambridge University Press; University Presses of Florida; State University of New York Press; MicroCase Publishers; University of Oklahoma Press; Addison Wesley Longman Press.

Program committees

Southwestern Political Science Association, 1997, 2002
Southern Political Science Association, 2000
Southwestern Social Science Association, 1997-2000

Panel Chair

Midwest Political Science Association, 2000
Oklahoma Political Science Association, 1999, 2000
Southwestern Political Science Association, 1993, 1995, 2001, 2007
Southern Political Science Association Meeting, 1995, 1998, 2001, 2005
Conference on Women Transforming Congress, Carl Albert Center for Congressional Studies, 2000
Moderator, McMahon Symposium, Gaylord College of Journalism and Mass Communication, the University of Oklahoma, 2003

Panel Discussant

Southern Political Science Association, 2001, 2005, 2006
Southwestern Political Science Association, 1994, 1995, 1996, 1999, 2000, 2001a, 2001b, 2002a, 2002b, 2003, 2007, 2008
Citadel Symposium, 1994
Midwestern Political Science Association, 2002, 2003, 2005
American Political Science Association, 2002

Roundtable participant

Southwestern Political Science Association, 1998, 2000, 2002, 2003, 2007
Southern Political Science Association Meeting, 1997, 1998, 1999, 2005

Committee and Council Work

President, Southwestern Political Science Association, 2007-2008
President-Elect, Southwestern Political Science Association, 2006-2007
Executive Council, Southwestern Social Science Association, 2007-2008, 2010-present
Executive Committee, Southwestern Social Science Association, 2010-present
Executive Council, Southwestern Political Science Association, 2001-2003
Nominations Committee, Southwestern Social Science Association, 2001-2003

Best Graduate Paper Award Committees:

Southwestern Political Science Association, 1999-2000 (Chair), 2000-2001 (Chair)
Southern Political Science Association (Malcolm Jewell Award) 1996-1997, 1999-2000 (Chair)
Best Undergraduate Paper Award Committee, Southwestern Political Science Association, 2007-08
V. O. Key Book Award Committee, Southern Political Science Association, 2002, 2004, 2011
Pi Sigma Alpha Award Committee, Southwestern Political Science Association, 2002
Membership Committee, Southern Political Science Association, 1998-2001

Membership Committee, Southwestern Political Science Association, 1998-present
Allen Saxe Award Committee, Southwestern Political Science Association, 2004 (Chair)
Workshop Leader, Southwestern Social Science Association, 1998.

COMMUNITY SERVICE

Oklahoma Intercollegiate Legislature Foundation, board member, 2010-
PTA Volunteer, Roosevelt Elementary School, Norman, OK.
Donor representative, Charles S. Bullock III Foundation Fund, University of Georgia, 1998-
Habitat for Humanity Volunteer (August 1994-96)
Irish Channel Neighborhood Watch; block captain (June 1993-June 1995)
Riverside Homeowners Association (June 1993-June 1995)

UNIVERSITY SERVICE

University

Faculty Advisor, university chapter of the Oklahoma Intercollegiate Legislature, 2010-
Faculty Advisor, OU Bass Fishing Team (OU Anglers), 2007-2009
Faculty Advisory Board, The University of Oklahoma Press, 2007-present
University Athletics Council, University of Oklahoma, 2004-2006
 Council Vice-Chair, 2005-2006
 Chair, Committee on Gender Equity & Compliance, 2005-2006
Campus Faculty Appeals Committee, 2004-
Campus Tenure Committee, University of Oklahoma, 2003-2004, 2007-10 (chair, 2008-2010)
Campus Disciplinary Council, University of Oklahoma, 1997- 2003
Faculty Senate Committee on Committees, University of Oklahoma, 2003-2006
Campus Departmental Review Panel, Office of the Provost, University of Oklahoma, 2003-2004
Freshman Faculty Mentor, The University of Oklahoma, 1999-2000
"Adopt-a-faculty" program, Jones House/ Sooner Center, University of Oklahoma, 1997-1998
University Conflict of Interest Advisory Committee, University of Oklahoma, 1997-99, 2001-03

College

College of Arts and Sciences Academic Misconduct Board, 1998-2000, 2001-

Department/Unit

Committee 'A' (departmental executive committee), 2010-2012
Chair, Special Committee for Promotion and Tenure Criteria, 2008-2009
ICPSR Representative, July 2000-May 2002, January 2003-
Faculty advisor, University of Oklahoma Public Opinion Learning Laboratory, August 1999-July 2004
Graduate Studies Committee, Department of Political Science, University of Oklahoma 1997-
Chair, Graduate Placement Committee, Department of Political Science, 1997- 2002
Chair, Departmental Computerization Task Force, Department of Political Science, 1996-1997
Cortez A.M. Ewing Fellowship selection committee, Department of Political Science University of Oklahoma,
 1996-1997, 1998-1999, 1999-2000
Undergraduate Studies Committee, Department of Political Science, University of Oklahoma 1996-1997.
Writing Team Head, Savannah River Site Minority Risk Perception Project, Consortium for Environmental Risk
 Evaluation, February 1995-April 1996.
Faculty Liaison, Consortium for Environmental Risk Evaluation, Tulane University Medical Center, November

1994-June 1996.

Resident Graduate Assistant (Football), University of Georgia Athletic Department, 1989-1990
Tutor, Student Mentor, Georgia Athletic Association, University of Georgia, 1991-1992

CONSULTING

Strickland, Brockington and Lewis LLP, for the state of Georgia, July 2011-present
Lee Slater Law Office (Oklahoma City) for the Oklahoma State Senate, July 2011-present
Holtzman Vogel PLLC (Washington DC) for the Louisiana House of Representatives, April 2011-present
Mayer Brown & Associates (Chicago) for the Illinois Congressional Republicans, January 2011-present
Michael, Best & Friedrich LLP (Madison) for the Wisconsin General Assembly & Senate, April 2011-present
Gulf County, Florida, March-June 2011.
Schirott, Luetkehans & Garner, P.C., for the Illinois Senate Republicans, June 2010-present
Tripp Scott Attorneys at Law, on behalf of the Florida Senate, July 2010-January 2011
Gray Robinson P.A. on behalf of the Florida House of Representatives, July 2010-January 2011
Lynn Tollitson Pinker Cox LLP, for plaintiffs in *Lepak et al. v. City of Irving, Texas*, June 2010-present.
Strickland, Brockington and Lewis LLP, for the state of Georgia, August 2007
Piscionere & Nemarow, P.C., on behalf of Village of Port Chester, New York, December 2006-June 2007
Mountain States Legal Foundation, on behalf of Fremont County, Wyoming, October 2006- February 2007
L'Abbate, Balkan, Colavita & Contini LLP on behalf of Osceola County and the City of Kissimmee, November 2005-July 2006
Office of the Attorney General of Oklahoma (pro bono consultation), September 2005
The Blum-Thernstrom Project on Fair Representation, through the National Research Initiative at the American Enterprise Institute, July 2005-present
Gunderson, Palmer, Goodsell, & Nelson, LLP, for Charles Mix County, South Dakota, March 2005-present; for the City of Martin, SD, September 2003-July 2004
US Representative Ernest Istook, Oklahoma's 5th District, July 2004
Speaker Pro Tempore of the Georgia Senate and Georgia State Republican Party, September 2003-January 2004
Office of the Attorney General, State of Texas, June 2003-January 2004
Office of the Attorney General, the Commonwealth of Virginia, April 2002-August 2003
Kankakee County, Ill., County Commission, September 2002-December 2002
Bexar County (TX) Republican Party, June 2002-December 2002
Speaker, Oklahoma House of Representatives and President Pro Temp, Oklahoma Senate, February-June 2002
Wisconsin General Assembly and Senate Minority Caucus, January-May 2002
Office of Governor Gary Johnson, New Mexico, November 2001-January 2002
Texas Republican Congressional Delegation, July 2001-November 2001
Oklahoma Indigent Defense System, July 1999-October 1999
Mayor Marc Morial's Transition Task Force on the Environment, City of New Orleans, March-May 1994
The Atlanta *Journal-Constitution*, April 1992-December 1992 (Statistical consultant)
The Pardue for Congress Committee, April-July 1992 (Strategist/pollster) Democratic candidate for Georgia congressional district 10

Expert Testimony

Lepak et al. v. City of Irving, Texas, 3:10-cv-0277-P (Northern District of Texas), June 7 2010
U.S. v. Village of Port Chester, NY No. 06 Civ. 15173 (Southern District of New York). February 22, 2007
Large et. al v. Fremont County, Wyoming, No. 05-CV-270J (D.Wy.) February 8, 2007.
United States v. Osceola County, Florida, (6:05-cv-1053-ORL-3,1 United States Federal Court for the Middle District of Florida, June 22 2006).
Hearings of the US Senate Judiciary Committee, on the Renewal of the Section 5 Voting Rights Act, Washington,

DC, May 16 2006.

Hearings of the US House of Representatives Judiciary Committee, Subcommittee on the Constitution, on the Renewal of the Section 5 Voting Rights Act, Washington, DC, October 25 2005.

Briefing of the US Commission on Civil Rights on the Renewal of the Voting Rights Act, Washington, DC, October 7 2005.

Larios v. Cox (1:03-CV-0693 United States Federal Court for the Northern District of Georgia, January 2004).

Sessions v. Perry (2:03-CV-354, United States Federal Court for the Eastern District of Texas, 2003, by deposition admitted as direct testimony, December 2003).

Public hearing of the Committee on Jurisprudence, Texas Senate, Austin Texas, July 24, 2003.

Armstrong v. Taylor et al, (State Court of Oklahoma for Oklahoma County, 2002)

Jensen & Panzer v. State Election Board (Case No. 01-C-121 United States Federal Court for the Eastern District of Wisconsin, 2002)

Michael Jepsen, et al., v. Rebecca Vigil-Jiron, et al. (CV-2001-2177, Second Judicial District Court, County of Bernalillo, State of New Mexico, 2001-2002, Congressional and State House phases)

Balderas, et al v. Perry et al. (6:01-CV-158, United States Federal District Court for the Eastern District of Texas, 2001)

Del Rio v. Perry (GN003665 353d Judicial Circuit of Texas, 2001)

REFERENCES

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DATE: December 14th, 2011
TO: Daniel Kelly/Reinhart Attorneys at Law
FROM: John Diez/Magellan Strategies BR
SUBJECT: Wisconsin Redistricting

As requested by counsel, the following report analyses Wisconsin's Congressional, State Senate and State Assembly redistricting plans as presented in Act 44 and Act 43. The report analyzed the following factors: compactness, core constituency retention, pairing and open seats. The data used to compute compactness and core constituency retention was provided by the State of Wisconsin Legislative Technology Service Bureau. The data used to calculate pairing and open seats was provided by Adam Foltz.

Compactness

Compactness was measured using calculations provided in Maptitude for Redistricting software. Eight different measures of compactness were calculated. Of the eight different compactness calculations, five are area-based measures while three are perimeter-based measures. Below is a brief description of compactness calculation methods provided by Maptitude. Also provided for each plan are the actual reports generated by Maptitude as well as an Excel spread sheet comparing each plan and districts' compactness to the proposed plan.

Reock Test

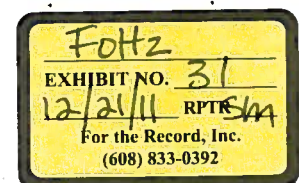
The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and the standard deviation for the plan.

Polsby-Popper Test

The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter $4\pi \text{Area}/(\text{Perimeter}^2)$. The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.

Population Polygon Test

The population polygon test computes the ratio of the district population to the approximate population of the convex hull of the district (minimum convex polygon which completely contains the district). The population of the convex hull is approximated by overlaying it with a



base layer, such as Census Blocks. The measure is always between 0 and 1, with 1 being the most compact. The Population Polygon test compares one number for each district and the minimum, maximum, mean and standard deviation for the plan.

Population Circle Test

The population circle test computes the ratio of the district population to the approximate population of the minimum enclosing circle of the district. The population of the circle is approximated by overlaying it with a base layer, such as Census Blocks. The measure is always between 0 and 1, with 1 being the most compact. The Population Circle test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.

Ehrenburg Test

The Ehrenburg test computes the ration of the largest inscribed circle divided by the area of the district. The measure is always between 0 and 1, with 1 being the most compact. The Ehrenburg test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.

Length-Width Test

The length-width test computes the absolute difference between the width (east-west) and the height (north-south) of each district the bounding box of a district is computed in longitude – latitude space, and the height and width of the box through the center point are compared. The total is divided by the number of districts to create the average length-width compactness. This measure of compactness is designed for contiguity since the bounding box encloses the entire district.

Perimeter Test

The Perimeter test computes the sum of the perimeters of all the districts. The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

Schwartzberg Test

The Schwartzburg test is a perimeter-based measure that compares a simplified version of each district to a circle, which is considered to be the most compact shape possible. This test requires the base layer that was used to create the districts. The base layer is used to simplify the district to exclude complicated coastlines.

For each district, the Schwartzburg test computes the ratio of the perimeter of the simplified version of the district to the perimeter of a circle with the same area as the original district. The district is simplified by only keeping those shape points where three or more areas in the base

layer come together. Water features and a neighboring state also count as base layer areas. This measure is usually greater than or equal to 1, with 1 being the most compact. Unfortunately, the simplification procedure can result in a polygon that is substantially smaller than the original district, which can yield a ratio less than 1 (e.g. an island has a 0 ratio). The Schwatzburg test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.

Core Constituency Retention

The Core Constituencies report calculates how much of each district's population, in the proposed plan, was retained from the current plans. The report calculates both the total and percentage of population retained. The report was generated using block level population data provided by the U.S. Census Bureau.

Pairing and Open Seats

Based on the incumbent geographic layer provided by Adam Foltz for members of the Assembly and Senate, proposed boundary lines were overlaid to determine which, if any, incumbents had been paired or if a seat with no incumbent was drawn.

Assembly Pairing and Open Seats

ACT 43 pairs twenty-two legislators in the Assembly into the same district. Of the eleven incumbent pairings, five pair a Republican and a Democrat, three pair two Republicans, and three pair two Democrats.

The following districts are where the incumbents were paired.

Republican/Democrat Pairings

- District 14 – David Cullen (D) District 13 vs. Dale Kooyenga (R) District 14
- District 22 – Frederick Kessler (D) District 12 vs. Don Pridemore (R) District 99
- District 23 – Sandy Pasch (D) District 22 vs. Jim Ott (R) District 23
- District 33 – Stephen Nass (R) District 31 vs. Andy Jorgensen (D) District 37
- District 61 – John Steinbrink (D) District 65 vs. Samantha Kerkman (R) District 66

Republican/Republican Pairings

- District 31 – Tyler August (R) District 32 vs. Amy Loudeneck (R) District 45
- District 88 – Andre Jacques (R) District 2 vs. John Klenke (R) District 88
- District 89 – John Nygren (R) District 89 vs. Karl Van Roy (R) District 90

Democrat/Democrat Pairings

- District 7 – Margarte Krusk (D) District 7 vs. Josh Zepnick (D) District 9
- District 76 - Chris Taylor (D) District 48 vs. Mark Pocan (D) District 78
- District 92 – Chris Danou (D) District 91 vs. Mark Radcliffe (D) District 92

As a result of the eleven paired districts, the following districts have no incumbents.

- District 2
- District 9
- District 12
- District 13
- District 32
- District 37
- District 47
- District 65
- District 80
- District 90
- District 91

While the incumbents for Districts 47 and 80 are not paired into another district, they were indirectly affected by shifts in redistricting. Keith Ripp of District 47 is now in District 42, while Fred Clark of District 42 is now in District 81. District 81 has been paired into District 48. Janis Ringhand who was formerly in District 80 is now in District 45, and District 45 is now paired into District 31.

Senate Pairing and Open Seats

Based on the incumbent geographic layer provided by client, Act 43 pairs two legislators in the Senate into the same district. The pairing groups one Republican and one Democrat into the same district.

The following districts are where the incumbent versus incumbent matchups will take place in 2012.

Republican/Democrat Pairings

- District 21 – Van Wanggaard (R) District 21 vs. Robert Wirth (D) District 22

As a result of paired districts, the following district will be vacant heading into the 2012 election.

- District 22

Accompanying Tables

Compactness Reports

CPCT_WISCONSIN MEASURES OF COMPACTNESS.XLSX

CPCT_CONGRESSIONAL COMPACTNESS REPORT FOR PROPOSED ACT 44.RTF

CPCT_CONGRESSIONAL COMPACTNESS REPORT FOR PROPOSED PLAN.RTF

CPCT_SENATE COMPACTNESS REPORT FOR PROPOSED ACT 43.RTF

CPCT_SENATE COMPACTNESS REPORT FOR PROPOSED PLAN.RTF

CPCT_ASSEMBLY COMPACTNESS REPORT FOR PROPOSED ACT 43.RTF

CPCT_ASSEMBLY COMPACTNESS REPORT FOR PROPOSED PLAN.RTF

Core Constituencies Reports

CCR_CONGRESSIONAL CORE CONSTITUENCIES REPORT

CCR_SENATE CORE CONSTITUENCIES REPORT

CCR_ASSEMBLY CORE CONSTITUENCIES REPORT

Political data

PD_ASSEMBLY POLITICAL DATA

PD_CONGRESSIONAL DATA

PD_SENATE POLITICAL DATA

About John Diez

John Diez is a principal and founder of Magellan Strategies BR, LLC, which specializes in redistricting, polling and voter files. John has worked with census data for the past 17 years. In that time he has provided redistricting services at the local, state and national levels.

John is active in his third redistricting cycle. He got his start in 1990 under the direction of a professor at LSU and was introduced to the redistricting process by assisting in the drawing and development of various parishes throughout Louisiana.

In 2000, John was Deputy Director of Redistricting Technology for the Republican National Committee in Washington, DC and in 2001 he assisted in the development and maintenance of the RNC's Geographical Information System, which integrated census and political data into a mapping application used to facilitate redistricting. He also supplied the RNC's expert witnesses with statistical analysis.

In 2011, Magellan Strategies BR was awarded the contract to build the redistricting database in 18 states. The firm was also hired by the Louisiana, Virginia and Mississippi Republican Caucuses to provide strategic redistricting consultation. John recently testified as a redistricting expert witness in Mississippi as a result of his work there.

To date, Magellan Strategies BR has built redistricting databases in nearly 30 states.

Billing Rates

Billing rates for redistricting work is \$125 per hour.

A handwritten signature in black ink that reads "John Diez". The signature is written in a cursive, slightly slanted style.

John Diez

Magellan Strategies BR

Core Contituencies Report: Congressional Districts (Act 44)

Population		White	Black	Hispanic
ACT 44 PLAN: CONG. DIST. # 1				
Totals	710,874	618,147	38,480	63,235
Old District: 1	686,159	96.5%	594,182	96.1%
Old District: 2	1,322	0.2%	1,259	0.2%
Old District: 5	23,393	3.3%	22,706	3.7%
ACT 44 PLAN: CONG. DIST. # 2				
Totals	710,874	616,835	32,231	41,423
Old District: 1	3,764	0.5%	3,632	0.6%
Old District: 2	633,024	89.0%	541,347	87.8%
Old District: 3	74,086	10.4%	71,856	11.6%
ACT 44 PLAN: CONG. DIST. # 3				
Totals	710,873	670,316	7,107	14,983
Old District: 3	539,603	75.9%	508,843	75.9%
Old District: 6	20,875	2.9%	19,409	2.9%
Old District: 7	150,395	21.2%	142,064	21.2%
ACT 44 PLAN: CONG. DIST. # 4				
Totals	710,873	365,351	245,601	110,488
Old District: 1	63	0.0%	52	0.0%
Old District: 4	647,764	91.1%	313,134	85.7%
Old District: 5	63,046	8.9%	52,165	14.3%
ACT 44 PLAN: CONG. DIST. # 5				
Totals	710,873	657,586	12,065	35,606
Old District: 1	38,056	5.4%	33,828	5.1%
Old District: 2	59,990	8.4%	55,505	8.4%
Old District: 4	21,251	3.0%	17,436	2.7%
Old District: 5	533,051	75.0%	494,692	75.2%
Old District: 6	58,525	8.2%	56,125	8.5%
ACT 44 PLAN: CONG. DIST. # 6				
Totals	710,873	661,939	11,172	27,087
Old District: 2	56,833	8.0%	54,468	8.2%
Old District: 5	88,090	12.4%	83,411	12.6%
Old District: 6	565,950	79.6%	524,060	79.2%
ACT 44 PLAN: CONG. DIST. # 7				
Totals	710,873	667,020	4,288	12,537
Old District: 3	116,268	16.4%	111,670	16.7%
Old District: 7	538,884	75.8%	504,770	75.7%
Old District: 8	55,721	7.8%	50,580	7.6%

Core Contituencies Report: Congressional Districts (Act 44)

Population	White	Black	Hispanic
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ACT 44 PLAN: CONG. DIST. # 8

Totals	710,871		644,871		8,204		30,697	
Old District: 6	59,752	8.4%	57,660	8.9%	212	2.6%	1,280	4.2%
Old District: 8	651,119	91.6%	587,211	91.1%	7,992	97.4%	29,417	95.8%

Core Contituencies Report: House Districts (Act 43)

Population		White	Black	Hispanic
ACT 43 PLAN: HOUSE. DIST. # 1				
Totals	57,220	55,406	241	1,239
Old District: 1	54,176	94.7%	52,432	94.6%
Old District: 2	2,938	5.1%	2,874	5.2%
Old District: 88	106	0.2%	100	0.2%
Old District: 89	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 2				
Totals	57,649	54,889	313	1,084
Old District: 2	37,534	65.1%	36,015	65.6%
Old District: 3	3,118	5.4%	3,039	5.5%
Old District: 4	12,654	22.0%	11,714	21.3%
Old District: 5	4,343	7.5%	4,121	7.5%
Old District: 25	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 3				
Totals	57,444	54,052	371	1,825
Old District: 3	54,430	94.8%	51,294	94.9%
Old District: 5	2,862	5.0%	2,620	4.8%
Old District: 25	2	0.0%	2	0.0%
Old District: 57	150	0.3%	136	0.3%
ACT 43 PLAN: HOUSE. DIST. # 4				
Totals	57,486	51,277	1,235	1,675
Old District: 4	32,022	55.7%	28,835	56.2%
Old District: 5	7,236	12.6%	6,006	11.7%
Old District: 90	18,228	31.7%	16,436	32.1%
ACT 43 PLAN: HOUSE. DIST. # 5				
Totals	57,470	52,139	279	1,247
Old District: 3	3,163	5.5%	3,014	5.8%
Old District: 5	45,587	79.3%	40,562	77.8%
Old District: 6	2,758	4.8%	2,708	5.2%
Old District: 56	3,404	5.9%	3,355	6.4%
Old District: 90	2,558	4.5%	2,500	4.8%
ACT 43 PLAN: HOUSE. DIST. # 6				
Totals	57,505	52,540	177	1,419
Old District: 5	972	1.7%	963	1.8%
Old District: 6	34,181	59.4%	31,215	59.4%
Old District: 36	3,658	6.4%	2,304	4.4%
Old District: 40	10,858	18.9%	10,518	20.0%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 86	1,689	2.9%	1,606	3.1%	4	2.3%	15	1.1%
Old District: 89	6,147	10.7%	5,934	11.3%	20	11.3%	87	6.1%
ACT 43 PLAN: HOUSE. DIST. # 7								
Totals	57,498		46,910		2,718		9,375	
Old District: 7	17,756	30.9%	15,268	32.5%	512	18.8%	2,487	26.5%
Old District: 9	8,002	13.9%	6,286	13.4%	455	16.7%	1,680	17.9%
Old District: 13	8,745	15.2%	6,599	14.1%	811	29.8%	1,604	17.1%
Old District: 15	16,497	28.7%	13,542	28.9%	767	28.2%	2,551	27.2%
Old District: 18	54	0.1%	41	0.1%	6	0.2%	7	0.1%
Old District: 20	5,083	8.8%	4,104	8.7%	129	4.7%	858	9.2%
Old District: 21	1,361	2.4%	1,070	2.3%	38	1.4%	188	2.0%
ACT 43 PLAN: HOUSE. DIST. # 8								
Totals	57,246		29,888		4,944		37,750	
Old District: 8	31,656	55.3%	14,863	49.7%	3,436	69.5%	22,668	60.0%
Old District: 9	22,862	39.9%	13,455	45.0%	1,258	25.4%	13,693	36.3%
Old District: 19	2,728	4.8%	1,570	5.3%	250	5.1%	1,389	3.7%
ACT 43 PLAN: HOUSE. DIST. # 9								
Totals	57,233		29,949		4,745		34,647	
Old District: 8	22,960	40.1%	10,550	35.2%	2,564	54.0%	15,386	44.4%
Old District: 9	28,532	49.9%	15,713	52.5%	1,751	36.9%	17,161	49.5%
Old District: 18	1,592	2.8%	753	2.5%	197	4.2%	924	2.7%
Old District: 20	4,149	7.2%	2,933	9.8%	233	4.9%	1,176	3.4%
ACT 43 PLAN: HOUSE. DIST. # 10								
Totals	57,428		16,284		37,543		2,515	
Old District: 10	38,095	66.3%	4,480	27.5%	31,394	83.6%	1,929	76.7%
Old District: 11	6,171	10.7%	203	1.2%	5,765	15.4%	139	5.5%
Old District: 22	13,162	22.9%	11,601	71.2%	384	1.0%	447	17.8%
ACT 43 PLAN: HOUSE. DIST. # 11								
Totals	57,503		13,327		37,651		2,080	
Old District: 10	6,863	11.9%	3,090	23.2%	3,295	8.8%	331	15.9%
Old District: 11	27,490	47.8%	3,433	25.8%	21,310	56.6%	971	46.7%
Old District: 12	16,750	29.1%	4,140	31.1%	9,690	25.7%	581	27.9%
Old District: 22	6,400	11.1%	2,664	20.0%	3,356	8.9%	197	9.5%
ACT 43 PLAN: HOUSE. DIST. # 12								
Totals	57,494		18,707		32,627		2,826	
Old District: 11	8,525	14.8%	1,837	9.8%	5,810	17.8%	333	11.8%
Old District: 12	29,814	51.9%	9,808	52.4%	16,845	51.6%	1,098	38.9%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 13	3,976	6.9%	2,567	13.7%	1,075	3.3%	129	4.6%
Old District: 17	1,559	2.7%	654	3.5%	767	2.4%	80	2.8%
Old District: 23	13,620	23.7%	3,841	20.5%	8,130	24.9%	1,186	42.0%
ACT 43 PLAN: HOUSE. DIST. # 13								
Totals	57,452		51,450		1,488		2,623	
Old District: 13	14,046	24.4%	12,577	24.4%	484	32.5%	790	30.1%
Old District: 14	22,419	39.0%	20,443	39.7%	588	39.5%	878	33.5%
Old District: 15	5,588	9.7%	4,907	9.5%	156	10.5%	552	21.0%
Old District: 97	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 98	15,399	26.8%	13,523	26.3%	260	17.5%	403	15.4%
ACT 43 PLAN: HOUSE. DIST. # 14								
Totals	57,597		51,656		2,052		1,448	
Old District: 12	1,934	3.4%	1,602	3.1%	161	7.8%	78	5.4%
Old District: 13	18,323	31.8%	16,148	31.3%	1,166	56.8%	615	42.5%
Old District: 14	20,622	35.8%	18,836	36.5%	526	25.6%	452	31.2%
Old District: 98	16,718	29.0%	15,070	29.2%	199	9.7%	303	20.9%
ACT 43 PLAN: HOUSE. DIST. # 15								
Totals	57,372		51,527		1,447		3,197	
Old District: 14	9,615	16.8%	8,378	16.3%	430	29.7%	643	20.1%
Old District: 15	27,149	47.3%	24,073	46.7%	829	57.3%	1,948	60.9%
Old District: 84	20,608	35.9%	19,076	37.0%	188	13.0%	606	19.0%
ACT 43 PLAN: HOUSE. DIST. # 16								
Totals	57,458		13,897		38,829		2,818	
Old District: 10	4,026	7.0%	2,105	15.1%	1,497	3.9%	460	16.3%
Old District: 11	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 16	39,361	68.5%	11,348	81.7%	25,323	65.2%	1,968	69.8%
Old District: 17	4,645	8.1%	77	0.6%	4,432	11.4%	73	2.6%
Old District: 18	9,426	16.4%	367	2.6%	7,577	19.5%	317	11.2%
Old District: 19	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 17								
Totals	57,354		15,686		36,864		2,323	
Old District: 11	9,992	17.4%	1,355	8.6%	7,836	21.3%	312	13.4%
Old District: 13	8,531	14.9%	6,114	39.0%	1,747	4.7%	472	20.3%
Old District: 17	35,226	61.4%	7,125	45.4%	25,060	68.0%	1,327	57.1%
Old District: 18	3,605	6.3%	1,092	7.0%	2,221	6.0%	212	9.1%
ACT 43 PLAN: HOUSE. DIST. # 18								
Totals	57,480		13,849		37,197		3,355	

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 13	246	0.4%	216	1.6%	21	0.1%	8	0.2%
Old District: 16	13,093	22.8%	3,991	28.8%	7,539	20.3%	1,142	34.0%
Old District: 17	10,431	18.1%	794	5.7%	9,191	24.7%	258	7.7%
Old District: 18	33,710	58.6%	8,848	63.9%	20,446	55.0%	1,947	58.0%
ACT 43 PLAN: HOUSE. DIST. # 19								
Totals	57,546		49,643		3,127		3,220	
Old District: 10	2,435	4.2%	1,818	3.7%	426	13.6%	154	4.8%
Old District: 16	56	0.1%	47	0.1%	2	0.1%	4	0.1%
Old District: 19	50,848	88.4%	43,932	88.5%	2,603	83.2%	2,894	89.9%
Old District: 21	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 22	4,207	7.3%	3,846	7.7%	96	3.1%	168	5.2%
ACT 43 PLAN: HOUSE. DIST. # 20								
Totals	57,428		50,866		1,327		6,551	
Old District: 7	3,717	6.5%	3,197	6.3%	120	9.0%	533	8.1%
Old District: 9	1,484	2.6%	1,295	2.5%	17	1.3%	214	3.3%
Old District: 19	3,251	5.7%	2,913	5.7%	81	6.1%	356	5.4%
Old District: 20	45,767	79.7%	40,699	80.0%	1,032	77.8%	4,972	75.9%
Old District: 21	3,209	5.6%	2,762	5.4%	77	5.8%	476	7.3%
ACT 43 PLAN: HOUSE. DIST. # 21								
Totals	57,449		51,278		1,414		4,365	
Old District: 21	55,607	96.8%	49,611	96.7%	1,390	98.3%	4,281	98.1%
Old District: 82	1,842	3.2%	1,667	3.3%	24	1.7%	84	1.9%
ACT 43 PLAN: HOUSE. DIST. # 22								
Totals	57,495		51,038		3,658		1,215	
Old District: 12	6,777	11.8%	3,548	7.0%	2,588	70.7%	317	26.1%
Old District: 24	28,069	48.8%	25,952	50.8%	788	21.5%	540	44.4%
Old District: 98	2,145	3.7%	2,082	4.1%	4	0.1%	30	2.5%
Old District: 99	20,504	35.7%	19,456	38.1%	278	7.6%	328	27.0%
ACT 43 PLAN: HOUSE. DIST. # 23								
Totals	57,579		53,668		1,082		1,348	
Old District: 22	20,811	36.1%	19,104	35.6%	458	42.3%	561	41.6%
Old District: 23	21,256	36.9%	19,698	36.7%	514	47.5%	458	34.0%
Old District: 60	15,512	26.9%	14,866	27.7%	110	10.2%	329	24.4%
ACT 43 PLAN: HOUSE. DIST. # 24								
Totals	57,282		48,551		5,075		1,584	
Old District: 22	8,437	14.7%	7,104	14.6%	744	14.7%	271	17.1%
Old District: 23	20,373	35.6%	14,964	30.8%	3,725	73.4%	658	41.5%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 24	27,346	47.7%	25,443	52.4%	570	11.2%	622	39.3%
Old District: 60	1,126	2.0%	1,040	2.1%	36	0.7%	33	2.1%
ACT 43 PLAN: HOUSE. DIST. # 25								
Totals	57,322		53,086		368		2,300	
Old District: 2	836	1.5%	809	1.5%	0	0.0%	9	0.4%
Old District: 3	5,078	8.9%	4,889	9.2%	13	3.5%	178	7.7%
Old District: 25	50,633	88.3%	46,632	87.8%	348	94.6%	2,104	91.5%
Old District: 27	775	1.4%	756	1.4%	7	1.9%	9	0.4%
ACT 43 PLAN: HOUSE. DIST. # 26								
Totals	57,581		50,706		765		4,187	
Old District: 26	32,869	57.1%	26,946	53.1%	657	85.9%	3,530	84.3%
Old District: 27	7,493	13.0%	7,194	14.2%	42	5.5%	195	4.7%
Old District: 59	17,219	29.9%	16,566	32.7%	66	8.6%	462	11.0%
ACT 43 PLAN: HOUSE. DIST. # 27								
Totals	57,536		53,233		424		2,258	
Old District: 2	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 25	2,745	4.8%	2,644	5.0%	9	2.1%	145	6.4%
Old District: 26	19,852	34.5%	17,006	31.9%	243	57.3%	1,419	62.8%
Old District: 27	34,939	60.7%	33,583	63.1%	172	40.6%	694	30.7%
Old District: 59	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 28								
Totals	57,467		55,341		184		944	
Old District: 28	56,053	97.5%	54,001	97.6%	176	95.7%	911	96.5%
Old District: 30	579	1.0%	539	1.0%	4	2.2%	21	2.2%
Old District: 75	835	1.5%	801	1.4%	4	2.2%	12	1.3%
ACT 43 PLAN: HOUSE. DIST. # 29								
Totals	57,537		54,636		363		961	
Old District: 28	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 29	55,563	96.6%	52,720	96.5%	360	99.2%	937	97.5%
Old District: 67	1,974	3.4%	1,916	3.5%	3	0.8%	24	2.5%
ACT 43 PLAN: HOUSE. DIST. # 30								
Totals	57,241		54,645		460		1,112	
Old District: 29	6,929	12.1%	6,659	12.2%	58	12.6%	109	9.8%
Old District: 30	50,312	87.9%	47,986	87.8%	402	87.4%	1,003	90.2%
ACT 43 PLAN: HOUSE. DIST. # 31								
Totals	57,240		52,035		1,367		4,770	
Old District: 31	13,566	23.7%	12,612	24.2%	115	8.4%	1,228	25.7%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 32	15,000	26.2%	13,774	26.5%	83	6.1%	1,764	37.0%
Old District: 43	2,580	4.5%	2,361	4.5%	105	7.7%	88	1.8%
Old District: 44	81	0.1%	73	0.1%	3	0.2%	3	0.1%
Old District: 45	26,013	45.4%	23,215	44.6%	1,061	77.6%	1,687	35.4%
ACT 43 PLAN: HOUSE. DIST. # 32								
Totals	57,524		52,729		444		6,509	
Old District: 31	4,170	7.2%	4,038	7.7%	15	3.4%	106	1.6%
Old District: 32	45,152	78.5%	40,777	77.3%	394	88.7%	6,113	93.9%
Old District: 66	2,155	3.7%	2,086	4.0%	8	1.8%	90	1.4%
Old District: 83	6,047	10.5%	5,828	11.1%	27	6.1%	200	3.1%
ACT 43 PLAN: HOUSE. DIST. # 33								
Totals	57,565		54,885		247		3,141	
Old District: 31	17,181	29.8%	16,693	30.4%	44	17.8%	560	17.8%
Old District: 33	4,697	8.2%	4,565	8.3%	16	6.5%	117	3.7%
Old District: 37	26,084	45.3%	24,292	44.3%	159	64.4%	2,183	69.5%
Old District: 83	9,603	16.7%	9,335	17.0%	28	11.3%	281	8.9%
ACT 43 PLAN: HOUSE. DIST. # 34								
Totals	57,387		55,478		192		608	
Old District: 34	49,669	86.6%	48,026	86.6%	178	92.7%	541	89.0%
Old District: 35	985	1.7%	963	1.7%	1	0.5%	7	1.2%
Old District: 36	6,733	11.7%	6,489	11.7%	13	6.8%	60	9.9%
ACT 43 PLAN: HOUSE. DIST. # 35								
Totals	57,562		55,565		239		866	
Old District: 6	302	0.5%	225	0.4%	0	0.0%	10	1.2%
Old District: 34	702	1.2%	683	1.2%	0	0.0%	1	0.1%
Old District: 35	49,506	86.0%	47,995	86.4%	218	91.2%	681	78.6%
Old District: 36	4,956	8.6%	4,610	8.3%	20	8.4%	147	17.0%
Old District: 85	2,096	3.6%	2,052	3.7%	1	0.4%	27	3.1%
ACT 43 PLAN: HOUSE. DIST. # 36								
Totals	57,432		50,598		180		921	
Old District: 6	16,849	29.3%	16,034	31.7%	25	13.9%	327	35.5%
Old District: 35	469	0.8%	466	0.9%	1	0.6%	0	0.0%
Old District: 36	34,672	60.4%	28,787	56.9%	147	81.7%	518	56.2%
Old District: 89	5,442	9.5%	5,311	10.5%	7	3.9%	76	8.3%
ACT 43 PLAN: HOUSE. DIST. # 37								
Totals	57,507		54,431		513		2,928	
Old District: 37	6,823	11.9%	6,331	11.6%	41	8.0%	518	17.7%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 38	37,039	64.4%	35,201	64.7%	286	55.8%	2,040	69.7%
Old District: 47	13,645	23.7%	12,899	23.7%	186	36.3%	370	12.6%
Old District: 81	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 38								
Totals	57,493		55,110		389		2,103	
Old District: 31	16,226	28.2%	15,479	28.1%	96	24.7%	694	33.0%
Old District: 37	20,048	34.9%	19,297	35.0%	175	45.0%	563	26.8%
Old District: 38	15,981	27.8%	15,545	28.2%	65	16.7%	304	14.5%
Old District: 47	5,238	9.1%	4,789	8.7%	53	13.6%	542	25.8%
ACT 43 PLAN: HOUSE. DIST. # 39								
Totals	57,387		54,843		356		2,544	
Old District: 38	6,777	11.8%	6,657	12.1%	10	2.8%	128	5.0%
Old District: 39	45,537	79.4%	43,268	78.9%	309	86.8%	2,333	91.7%
Old District: 59	2,337	4.1%	2,288	4.2%	9	2.5%	30	1.2%
Old District: 99	2,736	4.8%	2,630	4.8%	28	7.9%	53	2.1%
ACT 43 PLAN: HOUSE. DIST. # 40								
Totals	57,366		55,265		543		1,489	
Old District: 6	17	0.0%	14	0.0%	0	0.0%	0	0.0%
Old District: 40	44,365	77.3%	43,023	77.8%	138	25.4%	1,209	81.2%
Old District: 41	12,984	22.6%	12,228	22.1%	405	74.6%	280	18.8%
Old District: 71	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 41								
Totals	57,337		54,042		835		2,772	
Old District: 41	28,573	49.8%	27,438	50.8%	145	17.4%	1,232	44.4%
Old District: 42	15,487	27.0%	14,563	26.9%	90	10.8%	882	31.8%
Old District: 50	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 72	13,275	23.2%	12,039	22.3%	600	71.9%	658	23.7%
ACT 43 PLAN: HOUSE. DIST. # 42								
Totals	57,285		54,997		831		1,329	
Old District: 39	10,955	19.1%	10,082	18.3%	608	73.2%	328	24.7%
Old District: 41	5,448	9.5%	5,317	9.7%	28	3.4%	129	9.7%
Old District: 42	9,445	16.5%	9,207	16.7%	28	3.4%	169	12.7%
Old District: 47	31,437	54.9%	30,391	55.3%	167	20.1%	703	52.9%
ACT 43 PLAN: HOUSE. DIST. # 43								
Totals	57,443		54,131		768		2,847	
Old District: 31	771	1.3%	739	1.4%	2	0.3%	23	0.8%
Old District: 37	6,010	10.5%	5,881	10.9%	17	2.2%	263	9.2%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 43	44,952	78.3%	42,021	77.6%	692	90.1%	2,445	85.9%
Old District: 44	11	0.0%	11	0.0%	0	0.0%	0	0.0%
Old District: 46	5,699	9.9%	5,479	10.1%	57	7.4%	116	4.1%
ACT 43 PLAN: HOUSE. DIST. # 44								
Totals	57,395		52,430		1,577		3,274	
Old District: 43	264	0.5%	239	0.5%	1	0.1%	29	0.9%
Old District: 44	52,965	92.3%	48,209	91.9%	1,520	96.4%	3,127	95.5%
Old District: 45	4,166	7.3%	3,982	7.6%	56	3.6%	118	3.6%
ACT 43 PLAN: HOUSE. DIST. # 45								
Totals	57,658		46,594		5,083		6,394	
Old District: 43	9,788	17.0%	8,791	18.9%	429	8.4%	546	8.5%
Old District: 45	29,431	51.0%	19,945	42.8%	4,580	90.1%	5,346	83.6%
Old District: 80	18,439	32.0%	17,858	38.3%	74	1.5%	502	7.9%
ACT 43 PLAN: HOUSE. DIST. # 46								
Totals	57,458		51,620		2,221		1,866	
Old District: 46	57,407	99.9%	51,576	99.9%	2,220	100.0%	1,863	99.8%
Old District: 47	45	0.1%	39	0.1%	0	0.0%	3	0.2%
Old District: 81	6	0.0%	5	0.0%	1	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 47								
Totals	57,465		45,600		4,365		7,110	
Old District: 46	2,729	4.7%	2,657	5.8%	15	0.3%	35	0.5%
Old District: 48	26,771	46.6%	24,189	53.0%	905	20.7%	1,118	15.7%
Old District: 76	11,959	20.8%	7,537	16.5%	1,579	36.2%	2,884	40.6%
Old District: 78	4,831	8.4%	2,453	5.4%	1,027	23.5%	1,490	21.0%
Old District: 79	11,175	19.4%	8,764	19.2%	839	19.2%	1,583	22.3%
ACT 43 PLAN: HOUSE. DIST. # 48								
Totals	57,506		44,967		5,479		4,596	
Old District: 48	25,194	43.8%	21,332	47.4%	1,592	29.1%	1,771	38.5%
Old District: 78	3,200	5.6%	2,393	5.3%	331	6.0%	359	7.8%
Old District: 81	29,112	50.6%	21,242	47.2%	3,556	64.9%	2,466	53.7%
ACT 43 PLAN: HOUSE. DIST. # 49								
Totals	57,346		55,695		603		707	
Old District: 49	54,943	95.8%	53,329	95.8%	590	97.8%	689	97.5%
Old District: 51	30	0.1%	30	0.1%	0	0.0%	0	0.0%
Old District: 96	2,373	4.1%	2,336	4.2%	13	2.2%	18	2.5%
ACT 43 PLAN: HOUSE. DIST. # 50								
Totals	57,624		54,927		699		1,453	

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 50	56,284	97.7%	53,608	97.6%	689	98.6%	1,447	99.6%
Old District: 96	1,340	2.3%	1,319	2.4%	10	1.4%	6	0.4%
ACT 43 PLAN: HOUSE. DIST. # 51								
Totals	57,580		55,739		195		1,490	
Old District: 49	579	1.0%	568	1.0%	1	0.5%	10	0.7%
Old District: 50	1,748	3.0%	1,721	3.1%	2	1.0%	6	0.4%
Old District: 51	39,300	68.3%	38,158	68.5%	112	57.4%	879	59.0%
Old District: 80	15,953	27.7%	15,292	27.4%	80	41.0%	595	39.9%
ACT 43 PLAN: HOUSE. DIST. # 52								
Totals	57,232		52,846		1,141		3,025	
Old District: 27	782	1.4%	772	1.5%	2	0.2%	26	0.9%
Old District: 52	47,226	82.5%	43,083	81.5%	1,106	96.9%	2,814	93.0%
Old District: 53	9,224	16.1%	8,991	17.0%	33	2.9%	185	6.1%
ACT 43 PLAN: HOUSE. DIST. # 53								
Totals	57,240		52,411		2,686		1,172	
Old District: 39	23	0.0%	23	0.0%	0	0.0%	2	0.2%
Old District: 52	9,151	16.0%	8,776	16.7%	44	1.6%	322	27.5%
Old District: 53	48,010	83.9%	43,565	83.1%	2,640	98.3%	843	71.9%
Old District: 54	56	0.1%	47	0.1%	2	0.1%	5	0.4%
ACT 43 PLAN: HOUSE. DIST. # 54								
Totals	57,250		52,892		885		1,605	
Old District: 53	2,443	4.3%	2,246	4.2%	38	4.3%	64	4.0%
Old District: 54	54,807	95.7%	50,646	95.8%	847	95.7%	1,541	96.0%
ACT 43 PLAN: HOUSE. DIST. # 55								
Totals	57,493		53,290		649		2,408	
Old District: 55	29,613	51.5%	27,655	51.9%	358	55.2%	1,133	47.1%
Old District: 56	26,912	46.8%	24,780	46.5%	281	43.3%	1,224	50.8%
Old District: 57	968	1.7%	855	1.6%	10	1.5%	51	2.1%
ACT 43 PLAN: HOUSE. DIST. # 56								
Totals	57,582		53,231		394		1,574	
Old District: 5	133	0.2%	108	0.2%	0	0.0%	4	0.3%
Old District: 56	37,525	65.2%	35,732	67.1%	166	42.1%	755	48.0%
Old District: 57	19,924	34.6%	17,391	32.7%	228	57.9%	815	51.8%
ACT 43 PLAN: HOUSE. DIST. # 57								
Totals	57,501		50,583		1,126		3,763	
Old District: 55	24,544	42.7%	21,601	42.7%	423	37.6%	2,109	56.0%
Old District: 56	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 57	32,957	57.3%	28,982	57.3%	703	62.4%	1,654	44.0%
ACT 43 PLAN: HOUSE. DIST. # 58								
Totals	57,227		54,868		433		1,657	
Old District: 24	1,650	2.9%	1,611	2.9%	4	0.9%	18	1.1%
Old District: 58	50,598	88.4%	48,485	88.4%	364	84.1%	1,555	93.8%
Old District: 59	74	0.1%	68	0.1%	2	0.5%	2	0.1%
Old District: 60	1,005	1.8%	961	1.8%	16	3.7%	32	1.9%
Old District: 99	3,900	6.8%	3,743	6.8%	47	10.9%	50	3.0%
ACT 43 PLAN: HOUSE. DIST. # 59								
Totals	57,391		55,018		714		1,492	
Old District: 27	12,129	21.1%	11,723	21.3%	26	3.6%	301	20.2%
Old District: 58	4,454	7.8%	4,324	7.9%	17	2.4%	99	6.6%
Old District: 59	26,671	46.5%	25,502	46.4%	576	80.7%	427	28.6%
Old District: 99	14,137	24.6%	13,469	24.5%	95	13.3%	665	44.6%
ACT 43 PLAN: HOUSE. DIST. # 60								
Totals	57,385		55,403		436		1,242	
Old District: 58	5,059	8.8%	4,926	8.9%	28	6.4%	78	6.3%
Old District: 59	12,535	21.8%	12,124	21.9%	71	16.3%	325	26.2%
Old District: 60	39,791	69.3%	38,353	69.2%	337	77.3%	839	67.6%
ACT 43 PLAN: HOUSE. DIST. # 61								
Totals	57,614		54,347		728		2,965	
Old District: 64	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 65	20,780	36.1%	18,978	34.9%	500	68.7%	1,375	46.4%
Old District: 66	36,834	63.9%	35,369	65.1%	228	31.3%	1,590	53.6%
ACT 43 PLAN: HOUSE. DIST. # 62								
Totals	57,345		51,024		2,963		3,765	
Old District: 61	16,726	29.2%	13,412	26.3%	1,944	65.6%	1,762	46.8%
Old District: 62	4,903	8.6%	4,270	8.4%	302	10.2%	426	11.3%
Old District: 63	35,716	62.3%	33,342	65.3%	717	24.2%	1,577	41.9%
ACT 43 PLAN: HOUSE. DIST. # 63								
Totals	57,365		51,961		2,625		3,309	
Old District: 62	19,388	33.8%	16,121	31.0%	2,090	79.6%	1,286	38.9%
Old District: 63	23,160	40.4%	21,897	42.1%	433	16.5%	977	29.5%
Old District: 66	14,817	25.8%	13,943	26.8%	102	3.9%	1,046	31.6%
ACT 43 PLAN: HOUSE. DIST. # 64								
Totals	57,270		46,241		4,831		6,430	
Old District: 61	899	1.6%	814	1.8%	29	0.6%	138	2.1%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 62	8,393	14.7%	6,158	13.3%	1,342	27.8%	1,017	15.8%
Old District: 64	28,026	48.9%	23,192	50.2%	2,006	41.5%	3,369	52.4%
Old District: 65	12,191	21.3%	9,525	20.6%	928	19.2%	1,396	21.7%
Old District: 66	7,761	13.6%	6,552	14.2%	526	10.9%	510	7.9%
ACT 43 PLAN: HOUSE. DIST. # 65								
Totals	57,455		42,524		6,851		11,277	
Old District: 64	28,818	50.2%	19,094	44.9%	4,566	66.6%	7,212	64.0%
Old District: 65	28,637	49.8%	23,430	55.1%	2,285	33.4%	4,065	36.0%
ACT 43 PLAN: HOUSE. DIST. # 66								
Totals	57,545		32,267		14,761		13,935	
Old District: 61	34,343	59.7%	16,788	52.0%	10,336	70.0%	9,614	69.0%
Old District: 62	23,202	40.3%	15,479	48.0%	4,425	30.0%	4,321	31.0%
ACT 43 PLAN: HOUSE. DIST. # 67								
Totals	57,239		55,437		350		668	
Old District: 29	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 67	53,593	93.6%	51,922	93.7%	344	98.3%	631	94.5%
Old District: 68	2,707	4.7%	2,595	4.7%	6	1.7%	20	3.0%
Old District: 69	936	1.6%	917	1.7%	0	0.0%	17	2.5%
Old District: 93	1	0.0%	1	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 68								
Totals	57,261		54,360		830		866	
Old District: 67	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 68	25,650	44.8%	24,286	44.7%	134	16.1%	304	35.1%
Old District: 69	17,134	29.9%	16,170	29.7%	626	75.4%	281	32.4%
Old District: 91	2,511	4.4%	2,459	4.5%	3	0.4%	33	3.8%
Old District: 92	5,462	9.5%	5,326	9.8%	10	1.2%	99	11.4%
Old District: 93	6,504	11.4%	6,119	11.3%	57	6.9%	149	17.2%
ACT 43 PLAN: HOUSE. DIST. # 69								
Totals	57,649		54,904		242		2,187	
Old District: 69	39,799	69.0%	38,012	69.2%	112	46.3%	1,707	78.1%
Old District: 70	16,967	29.4%	16,081	29.3%	125	51.7%	437	20.0%
Old District: 86	4	0.0%	0	0.0%	0	0.0%	4	0.2%
Old District: 87	64	0.1%	51	0.1%	0	0.0%	29	1.3%
Old District: 92	815	1.4%	760	1.4%	5	2.1%	10	0.5%
ACT 43 PLAN: HOUSE. DIST. # 70								
Totals	57,552		54,394		531		1,630	
Old District: 70	25,134	43.7%	24,202	44.5%	64	12.1%	437	26.8%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 71	6	0.0%	6	0.0%	0	0.0%	0	0.0%
Old District: 72	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 92	32,410	56.3%	30,184	55.5%	467	87.9%	1,193	73.2%
Old District: 94	2	0.0%	2	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 71								
Totals	57,519		53,884		350		1,489	
Old District: 70	4,907	8.5%	4,762	8.8%	4	1.1%	115	7.7%
Old District: 71	51,221	89.1%	47,762	88.6%	345	98.6%	1,344	90.3%
Old District: 86	1,391	2.4%	1,360	2.5%	1	0.3%	30	2.0%
ACT 43 PLAN: HOUSE. DIST. # 72								
Totals	57,449		54,395		287		2,218	
Old District: 41	8,576	14.9%	8,092	14.9%	34	11.8%	683	30.8%
Old District: 70	203	0.4%	196	0.4%	1	0.3%	1	0.0%
Old District: 71	6,188	10.8%	5,820	10.7%	21	7.3%	600	27.1%
Old District: 72	42,482	73.9%	40,287	74.1%	231	80.5%	934	42.1%
ACT 43 PLAN: HOUSE. DIST. # 73								
Totals	57,453		53,454		531		684	
Old District: 28	1,052	1.8%	866	1.6%	3	0.6%	9	1.3%
Old District: 73	53,013	92.3%	49,349	92.3%	521	98.1%	631	92.3%
Old District: 75	3,388	5.9%	3,239	6.1%	7	1.3%	44	6.4%
ACT 43 PLAN: HOUSE. DIST. # 74								
Totals	57,494		50,124		144		749	
Old District: 34	3,441	6.0%	1,175	2.3%	4	2.8%	84	11.2%
Old District: 73	1,177	2.0%	1,141	2.3%	4	2.8%	0	0.0%
Old District: 74	38,717	67.3%	34,058	67.9%	97	67.4%	512	68.4%
Old District: 87	14,159	24.6%	13,750	27.4%	39	27.1%	153	20.4%
ACT 43 PLAN: HOUSE. DIST. # 75								
Totals	57,462		55,246		431		999	
Old District: 28	2,168	3.8%	2,091	3.8%	3	0.7%	42	4.2%
Old District: 29	629	1.1%	615	1.1%	1	0.2%	11	1.1%
Old District: 67	3,155	5.5%	3,108	5.6%	3	0.7%	41	4.1%
Old District: 73	772	1.3%	728	1.3%	0	0.0%	5	0.5%
Old District: 75	50,738	88.3%	48,704	88.2%	424	98.4%	900	90.1%
ACT 43 PLAN: HOUSE. DIST. # 76								
Totals	57,617		48,668		2,980		2,656	
Old District: 48	6,021	10.5%	4,992	10.3%	583	19.6%	294	11.1%
Old District: 76	6,964	12.1%	6,118	12.6%	120	4.0%	198	7.5%

Core Contituencies Report: House Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 77	5,473	9.5%	4,498	9.2%	125	4.2%	254	9.6%
Old District: 78	39,159	68.0%	33,060	67.9%	2,152	72.2%	1,910	71.9%
ACT 43 PLAN: HOUSE. DIST. # 77								
Totals	57,433		42,796		4,334		4,884	
Old District: 48	3,414	5.9%	2,101	4.9%	393	9.1%	891	18.2%
Old District: 76	23,661	41.2%	19,034	44.5%	2,008	46.3%	1,628	33.3%
Old District: 77	22,517	39.2%	17,012	39.8%	653	15.1%	953	19.5%
Old District: 78	7,841	13.7%	4,649	10.9%	1,280	29.5%	1,412	28.9%
ACT 43 PLAN: HOUSE. DIST. # 78								
Totals	57,546		45,519		3,675		3,379	
Old District: 76	18,961	32.9%	15,039	33.0%	1,460	39.7%	1,368	40.5%
Old District: 77	18,477	32.1%	14,174	31.1%	1,669	45.4%	1,117	33.1%
Old District: 79	20,108	34.9%	16,306	35.8%	546	14.9%	894	26.5%
ACT 43 PLAN: HOUSE. DIST. # 79								
Totals	57,461		53,371		1,007		1,860	
Old District: 46	2	0.0%	1	0.0%	0	0.0%	1	0.1%
Old District: 47	5,076	8.8%	4,811	9.0%	65	6.5%	146	7.8%
Old District: 48	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 76	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 77	5,490	9.6%	4,717	8.8%	261	25.9%	425	22.8%
Old District: 78	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 79	18,081	31.5%	16,558	31.0%	319	31.7%	589	31.7%
Old District: 81	28,808	50.1%	27,280	51.1%	362	35.9%	699	37.6%
ACT 43 PLAN: HOUSE. DIST. # 80								
Totals	57,585		54,916		839		1,228	
Old District: 51	4,823	8.4%	4,726	8.6%	19	2.3%	66	5.4%
Old District: 76	48	0.1%	34	0.1%	0	0.0%	0	0.0%
Old District: 79	26,752	46.5%	25,027	45.6%	655	78.1%	607	49.4%
Old District: 80	25,960	45.1%	25,128	45.8%	165	19.7%	555	45.2%
Old District: 81	2	0.0%	1	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: HOUSE. DIST. # 81								
Totals	57,403		54,005		822		2,224	
Old District: 42	33,046	57.6%	30,808	57.0%	722	87.8%	1,168	52.5%
Old District: 47	6,256	10.9%	6,104	11.3%	13	1.6%	92	4.1%
Old District: 50	1,148	2.0%	1,109	2.1%	1	0.1%	29	1.3%
Old District: 51	13,534	23.6%	12,702	23.5%	54	6.6%	871	39.2%
Old District: 81	3,419	6.0%	3,282	6.1%	32	3.9%	64	2.9%

Core Contituencies Report: House Districts (Act 43)

Population		White		Black		Hispanic		
ACT 43 PLAN: HOUSE. DIST. # 82								
Totals	57,430		50,676		2,151		2,988	
Old District: 7	10,715	18.7%	9,339	18.4%	273	12.7%	841	28.1%
Old District: 82	46,715	81.3%	41,337	81.6%	1,878	87.3%	2,147	71.9%
ACT 43 PLAN: HOUSE. DIST. # 83								
Totals	57,423		55,642		249		1,484	
Old District: 33	261	0.5%	254	0.5%	0	0.0%	1	0.1%
Old District: 63	5	0.0%	5	0.0%	0	0.0%	0	0.0%
Old District: 82	940	1.6%	899	1.6%	2	0.8%	28	1.9%
Old District: 83	45,556	79.3%	44,337	79.7%	161	64.7%	1,037	69.9%
Old District: 84	10,661	18.6%	10,147	18.2%	86	34.5%	418	28.2%
ACT 43 PLAN: HOUSE. DIST. # 84								
Totals	57,365		52,108		1,089		3,973	
Old District: 7	23,637	41.2%	20,530	39.4%	736	67.6%	2,651	66.7%
Old District: 15	4,214	7.3%	3,836	7.4%	105	9.6%	390	9.8%
Old District: 82	10,538	18.4%	9,831	18.9%	146	13.4%	502	12.6%
Old District: 84	18,976	33.1%	17,911	34.4%	102	9.4%	430	10.8%
ACT 43 PLAN: HOUSE. DIST. # 85								
Totals	57,480		50,121		602		1,459	
Old District: 35	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 36	785	1.4%	752	1.5%	0	0.0%	19	1.3%
Old District: 85	48,541	84.4%	41,568	82.9%	589	97.8%	1,283	87.9%
Old District: 86	8,154	14.2%	7,801	15.6%	13	2.2%	157	10.8%
ACT 43 PLAN: HOUSE. DIST. # 86								
Totals	57,454		53,991		201		909	
Old District: 70	6,700	11.7%	6,551	12.1%	14	7.0%	133	14.6%
Old District: 85	4,203	7.3%	3,981	7.4%	4	2.0%	61	6.7%
Old District: 86	46,551	81.0%	43,459	80.5%	183	91.0%	715	78.7%
ACT 43 PLAN: HOUSE. DIST. # 87								
Totals	57,358		52,968		203		875	
Old District: 35	1,756	3.1%	1,680	3.2%	2	1.0%	67	7.7%
Old District: 69	1,238	2.2%	1,208	2.3%	0	0.0%	21	2.4%
Old District: 74	13,906	24.2%	10,577	20.0%	75	36.9%	247	28.2%
Old District: 86	1,974	3.4%	1,927	3.6%	5	2.5%	17	1.9%
Old District: 87	38,484	67.1%	37,576	70.9%	121	59.6%	523	59.8%
ACT 43 PLAN: HOUSE. DIST. # 88								
Totals	57,556		50,401		913		4,733	

Core Contituencies Report: House Districts (Act 43)

		Population		White		Black		Hispanic	
Old District: 1	13	0.0%	13	0.0%	0	0.0%	0	0.0%	
Old District: 2	19,701	34.2%	17,654	35.0%	189	20.7%	1,443	30.5%	
Old District: 4	10,277	17.9%	9,815	19.5%	92	10.1%	215	4.5%	
Old District: 88	27,565	47.9%	22,919	45.5%	632	69.2%	3,075	65.0%	
ACT 43 PLAN: HOUSE. DIST. # 89									
Totals	57,634		55,532		360		899		
Old District: 6	1,856	3.2%	1,823	3.3%	2	0.6%	25	2.8%	
Old District: 89	47,410	82.3%	46,060	82.9%	130	36.1%	604	67.2%	
Old District: 90	8,368	14.5%	7,649	13.8%	228	63.3%	270	30.0%	
ACT 43 PLAN: HOUSE. DIST. # 90									
Totals	57,608		42,123		2,756		10,090		
Old District: 4	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Old District: 88	30,418	52.8%	20,858	49.5%	1,579	57.3%	7,395	73.3%	
Old District: 90	27,190	47.2%	21,265	50.5%	1,177	42.7%	2,695	26.7%	
ACT 43 PLAN: HOUSE. DIST. # 91									
Totals	57,359		52,585		659		1,132		
Old District: 68	26,672	46.5%	24,147	45.9%	305	46.3%	527	46.6%	
Old District: 93	30,687	53.5%	28,438	54.1%	354	53.7%	605	53.4%	
ACT 43 PLAN: HOUSE. DIST. # 92									
Totals	57,431		53,475		488		2,354		
Old District: 91	40,682	70.8%	38,794	72.5%	99	20.3%	1,881	79.9%	
Old District: 92	16,749	29.2%	14,681	27.5%	389	79.7%	473	20.1%	
ACT 43 PLAN: HOUSE. DIST. # 93									
Totals	57,548		55,610		197		840		
Old District: 29	3,691	6.4%	3,626	6.5%	7	3.6%	56	6.7%	
Old District: 30	15,684	27.3%	15,212	27.4%	35	17.8%	211	25.1%	
Old District: 68	4,100	7.1%	3,859	6.9%	11	5.6%	56	6.7%	
Old District: 91	13,443	23.4%	13,229	23.8%	40	20.3%	152	18.1%	
Old District: 93	20,630	35.8%	19,684	35.4%	104	52.8%	365	43.5%	
ACT 43 PLAN: HOUSE. DIST. # 94									
Totals	57,266		53,695		405		670		
Old District: 94	56,088	97.9%	52,572	97.9%	402	99.3%	660	98.5%	
Old District: 95	1,178	2.1%	1,123	2.1%	3	0.7%	10	1.5%	
ACT 43 PLAN: HOUSE. DIST. # 95									
Totals	57,372		51,845		1,205		1,071		
Old District: 94	4,552	7.9%	4,322	8.3%	40	3.3%	43	4.0%	
Old District: 95	52,820	92.1%	47,523	91.7%	1,165	96.7%	1,028	96.0%	

Core Contituencies Report: House Districts (Act 43)

Population	White	Black	Hispanic
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ACT 43 PLAN: HOUSE. DIST. # 96

Totals	57,484		55,706		444		1,014	
Old District: 92	3,458	6.0%	3,362	6.0%	17	3.8%	66	6.5%
Old District: 94	1,999	3.5%	1,931	3.5%	7	1.6%	47	4.6%
Old District: 96	52,027	90.5%	50,413	90.5%	420	94.6%	901	88.9%

ACT 43 PLAN: HOUSE. DIST. # 97

Totals	57,279		51,496		1,221		6,522	
Old District: 33	7,544	13.2%	7,259	14.1%	33	2.7%	221	3.4%
Old District: 84	5,980	10.4%	5,351	10.4%	111	9.1%	472	7.2%
Old District: 97	43,755	76.4%	38,886	75.5%	1,077	88.2%	5,829	89.4%

ACT 43 PLAN: HOUSE. DIST. # 98

Totals	57,513		52,540		816		3,230	
Old District: 33	11,702	20.3%	10,735	20.4%	139	17.0%	581	18.0%
Old District: 97	13,544	23.5%	11,447	21.8%	352	43.1%	1,832	56.7%
Old District: 98	21,823	37.9%	20,412	38.9%	244	29.9%	572	17.7%
Old District: 99	10,444	18.2%	9,946	18.9%	81	9.9%	245	7.6%

ACT 43 PLAN: HOUSE. DIST. # 99

Totals	57,496		55,369		519		1,265	
Old District: 31	9,853	17.1%	9,532	17.2%	81	15.6%	211	16.7%
Old District: 33	35,249	61.3%	33,860	61.2%	387	74.6%	851	67.3%
Old District: 38	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 98	365	0.6%	355	0.6%	3	0.6%	3	0.2%
Old District: 99	12,029	20.9%	11,622	21.0%	48	9.2%	200	15.8%

Core Contituencies Report: Senate Districts (Act 43)

	Population		White		Black		Hispanic		
ACT 43 PLAN: SENATE. DIST. # 1									
Totals	172,313		164,347		925		4,148		
Old District: 1	152,196	88.3%	145,654	88.6%	737	79.7%	3,646	87.9%	
Old District: 2	19,859	11.5%	18,455	11.2%	188	20.3%	498	12.0%	
Old District: 9	2	0.0%	2	0.0%	0	0.0%	0	0.0%	
Old District: 19	150	0.1%	136	0.1%	0	0.0%	4	0.1%	
Old District: 30	106	0.1%	100	0.1%	0	0.0%	0	0.0%	
ACT 43 PLAN: SENATE. DIST. # 2									
Totals	172,461		155,956		1,691		4,341		
Old District: 1	3,163	1.8%	3,014	1.9%	11	0.7%	67	1.5%	
Old District: 2	122,756	71.2%	110,289	70.7%	1,375	81.3%	3,166	72.9%	
Old District: 12	3,658	2.1%	2,304	1.5%	22	1.3%	144	3.3%	
Old District: 14	10,858	6.3%	10,518	6.7%	25	1.5%	268	6.2%	
Old District: 19	3,404	2.0%	3,355	2.2%	5	0.3%	23	0.5%	
Old District: 29	1,689	1.0%	1,606	1.0%	4	0.2%	15	0.3%	
Old District: 30	26,933	15.6%	24,870	15.9%	249	14.7%	658	15.2%	
ACT 43 PLAN: SENATE. DIST. # 3									
Totals	171,977		106,747		12,407		81,772		
Old District: 3	131,768	76.6%	76,135	71.3%	9,976	80.4%	73,075	89.4%	
Old District: 5	25,242	14.7%	20,141	18.9%	1,578	12.7%	4,155	5.1%	
Old District: 6	1,646	1.0%	794	0.7%	203	1.6%	931	1.1%	
Old District: 7	13,321	7.7%	9,677	9.1%	650	5.2%	3,611	4.4%	
ACT 43 PLAN: SENATE. DIST. # 4									
Totals	172,425		48,318		107,821		7,421		
Old District: 4	133,708	77.5%	26,991	55.9%	94,109	87.3%	5,382	72.5%	
Old District: 5	3,976	2.3%	2,567	5.3%	1,075	1.0%	129	1.7%	
Old District: 6	1,559	0.9%	654	1.4%	767	0.7%	80	1.1%	
Old District: 8	33,182	19.2%	18,106	37.5%	11,870	11.0%	1,830	24.7%	
ACT 43 PLAN: SENATE. DIST. # 5									
Totals	172,421		154,633		4,987		7,268		
Old District: 4	1,934	1.1%	1,602	1.0%	161	3.2%	78	1.1%	
Old District: 5	117,762	68.3%	105,362	68.1%	4,179	83.8%	5,878	80.9%	
Old District: 28	20,608	12.0%	19,076	12.3%	188	3.8%	606	8.3%	
Old District: 33	32,117	18.6%	28,593	18.5%	459	9.2%	706	9.7%	
ACT 43 PLAN: SENATE. DIST. # 6									
Totals	172,292		43,432		112,890		8,496		
Old District: 4	14,018	8.1%	3,460	8.0%	9,333	8.3%	772	9.1%	

Core Contituencies Report: Senate Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 5	8,777	5.1%	6,330	14.6%	1,768	1.6%	480	5.6%
Old District: 6	149,497	86.8%	33,642	77.5%	101,789	90.2%	7,244	85.3%
Old District: 7	0	0.0%	0	0.0%	0	0.0%	0	0.0%
ACT 43 PLAN: SENATE. DIST. # 7								
Totals	172,423		151,787		5,868		14,136	
Old District: 3	5,201	3.0%	4,492	3.0%	137	2.3%	747	5.3%
Old District: 4	2,435	1.4%	1,818	1.2%	426	7.3%	154	1.1%
Old District: 6	56	0.0%	47	0.0%	2	0.0%	4	0.0%
Old District: 7	158,682	92.0%	139,917	92.2%	5,183	88.3%	12,979	91.8%
Old District: 8	4,207	2.4%	3,846	2.5%	96	1.6%	168	1.2%
Old District: 28	1,842	1.1%	1,667	1.1%	24	0.4%	84	0.6%
ACT 43 PLAN: SENATE. DIST. # 8								
Totals	172,356		153,257		9,815		4,147	
Old District: 4	6,777	3.9%	3,548	2.3%	2,588	26.4%	317	7.6%
Old District: 8	126,292	73.3%	112,265	73.3%	6,799	69.3%	3,110	75.0%
Old District: 20	16,638	9.7%	15,906	10.4%	146	1.5%	362	8.7%
Old District: 33	22,649	13.1%	21,538	14.1%	282	2.9%	358	8.6%
ACT 43 PLAN: SENATE. DIST. # 9								
Totals	172,439		157,025		1,557		8,745	
Old District: 1	5,914	3.4%	5,698	3.6%	13	0.8%	187	2.1%
Old District: 9	149,306	86.6%	134,761	85.8%	1,478	94.9%	8,096	92.6%
Old District: 20	17,219	10.0%	16,566	10.5%	66	4.2%	462	5.3%
ACT 43 PLAN: SENATE. DIST. # 10								
Totals	172,245		164,622		1,007		3,017	
Old District: 10	169,436	98.4%	161,905	98.3%	1,000	99.3%	2,981	98.8%
Old District: 23	1,974	1.1%	1,916	1.2%	3	0.3%	24	0.8%
Old District: 25	835	0.5%	801	0.5%	4	0.4%	12	0.4%
ACT 43 PLAN: SENATE. DIST. # 11								
Totals	172,329		159,649		2,058		14,420	
Old District: 11	99,766	57.9%	92,459	57.9%	667	32.4%	9,888	68.6%
Old District: 13	26,084	15.1%	24,292	15.2%	159	7.7%	2,183	15.1%
Old District: 15	28,674	16.6%	25,649	16.1%	1,169	56.8%	1,778	12.3%
Old District: 22	2,155	1.3%	2,086	1.3%	8	0.4%	90	0.6%
Old District: 28	15,650	9.1%	15,163	9.5%	55	2.7%	481	3.3%
ACT 43 PLAN: SENATE. DIST. # 12								
Totals	172,381		161,641		611		2,395	
Old District: 2	17,151	9.9%	16,259	10.1%	25	4.1%	337	14.1%

Core Contituencies Report: Senate Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 12	147,692	85.7%	138,019	85.4%	578	94.6%	1,955	81.6%
Old District: 29	2,096	1.2%	2,052	1.3%	1	0.2%	27	1.1%
Old District: 30	5,442	3.2%	5,311	3.3%	7	1.1%	76	3.2%
ACT 43 PLAN: SENATE. DIST. # 13								
Totals	172,387		164,384		1,258		7,575	
Old District: 11	16,226	9.4%	15,479	9.4%	96	7.6%	694	9.2%
Old District: 13	132,205	76.7%	126,299	76.8%	886	70.4%	5,886	77.7%
Old District: 16	18,883	11.0%	17,688	10.8%	239	19.0%	912	12.0%
Old District: 20	2,337	1.4%	2,288	1.4%	9	0.7%	30	0.4%
Old District: 27	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 33	2,736	1.6%	2,630	1.6%	28	2.2%	53	0.7%
ACT 43 PLAN: SENATE. DIST. # 14								
Totals	171,988		164,304		2,209		5,590	
Old District: 2	17	0.0%	14	0.0%	0	0.0%	0	0.0%
Old District: 13	10,955	6.4%	10,082	6.1%	608	27.5%	328	5.9%
Old District: 14	116,302	67.6%	111,776	68.0%	834	37.8%	3,901	69.8%
Old District: 16	31,437	18.3%	30,391	18.5%	167	7.6%	703	12.6%
Old District: 17	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 24	13,275	7.7%	12,039	7.3%	600	27.2%	658	11.8%
ACT 43 PLAN: SENATE. DIST. # 15								
Totals	172,496		153,155		7,428		12,515	
Old District: 11	771	0.4%	739	0.5%	2	0.0%	23	0.2%
Old District: 13	6,010	3.5%	5,881	3.8%	17	0.2%	263	2.1%
Old District: 15	141,577	82.1%	123,198	80.4%	7,278	98.0%	11,611	92.8%
Old District: 16	5,699	3.3%	5,479	3.6%	57	0.8%	116	0.9%
Old District: 27	18,439	10.7%	17,858	11.7%	74	1.0%	502	4.0%
ACT 43 PLAN: SENATE. DIST. # 16								
Totals	172,429		142,187		12,065		13,572	
Old District: 16	112,146	65.0%	99,793	70.2%	4,732	39.2%	4,790	35.3%
Old District: 26	19,990	11.6%	12,383	8.7%	2,937	24.3%	4,733	34.9%
Old District: 27	40,293	23.4%	30,011	21.1%	4,396	36.4%	4,049	29.8%
ACT 43 PLAN: SENATE. DIST. # 17								
Totals	172,550		166,361		1,497		3,650	
Old District: 17	152,884	88.6%	147,414	88.6%	1,394	93.1%	3,031	83.0%
Old District: 27	15,953	9.2%	15,292	9.2%	80	5.3%	595	16.3%
Old District: 32	3,713	2.2%	3,655	2.2%	23	1.5%	24	0.7%

Core Constituencies Report: Senate Districts (Act 43)

Population		White		Black		Hispanic		
ACT 43 PLAN: SENATE. DIST. # 18								
Totals	171,722		158,149		4,712		5,802	
Old District: 9	782	0.5%	772	0.5%	2	0.0%	26	0.4%
Old District: 13	23	0.0%	23	0.0%	0	0.0%	2	0.0%
Old District: 18	170,917	99.5%	157,354	99.5%	4,710	100.0%	5,774	99.5%
ACT 43 PLAN: SENATE. DIST. # 19								
Totals	172,576		157,104		2,169		7,745	
Old District: 2	133	0.1%	108	0.1%	0	0.0%	4	0.1%
Old District: 19	172,443	99.9%	156,996	99.9%	2,169	100.0%	7,741	99.9%
ACT 43 PLAN: SENATE. DIST. # 20								
Totals	172,003		165,289		1,583		4,391	
Old District: 8	1,650	1.0%	1,611	1.0%	4	0.3%	18	0.4%
Old District: 9	12,129	7.1%	11,723	7.1%	26	1.6%	301	6.9%
Old District: 20	140,187	81.5%	134,743	81.5%	1,411	89.1%	3,357	76.5%
Old District: 33	18,037	10.5%	17,212	10.4%	142	9.0%	715	16.3%
ACT 43 PLAN: SENATE. DIST. # 21								
Totals	172,324		157,332		6,316		10,039	
Old District: 21	99,893	58.0%	89,042	56.6%	5,486	86.9%	6,028	60.0%
Old District: 22	72,431	42.0%	68,290	43.4%	830	13.1%	4,011	40.0%
ACT 43 PLAN: SENATE. DIST. # 22								
Totals	172,270		121,032		26,443		31,642	
Old District: 21	66,837	38.8%	39,239	32.4%	16,132	61.0%	15,090	47.7%
Old District: 22	105,433	61.2%	81,793	67.6%	10,311	39.0%	16,552	52.3%
ACT 43 PLAN: SENATE. DIST. # 23								
Totals	172,149		164,701		1,422		3,721	
Old District: 10	2	0.0%	2	0.0%	0	0.0%	0	0.0%
Old District: 23	139,819	81.2%	133,902	81.3%	1,222	85.9%	2,960	79.5%
Old District: 24	16,967	9.9%	16,081	9.8%	125	8.8%	437	11.7%
Old District: 29	68	0.0%	51	0.0%	0	0.0%	33	0.9%
Old District: 31	15,293	8.9%	14,665	8.9%	75	5.3%	291	7.8%
ACT 43 PLAN: SENATE. DIST. # 24								
Totals	172,520		162,673		1,168		5,337	
Old District: 14	8,576	5.0%	8,092	5.0%	34	2.9%	683	12.8%
Old District: 24	130,141	75.4%	123,035	75.6%	666	57.0%	3,431	64.3%
Old District: 29	1,391	0.8%	1,360	0.8%	1	0.1%	30	0.6%
Old District: 31	32,410	18.8%	30,184	18.6%	467	40.0%	1,193	22.4%
Old District: 32	2	0.0%	2	0.0%	0	0.0%	0	0.0%

Core Contituencies Report: Senate Districts (Act 43)

	Population		White		Black		Hispanic	
ACT 43 PLAN: SENATE. DIST. # 25								
Totals	172,409		158,824		1,106		2,432	
Old District: 10	3,849	2.2%	3,572	2.2%	7	0.6%	62	2.5%
Old District: 12	3,441	2.0%	1,175	0.7%	4	0.4%	84	3.5%
Old District: 23	3,155	1.8%	3,108	2.0%	3	0.3%	41	1.7%
Old District: 25	147,805	85.7%	137,219	86.4%	1,053	95.2%	2,092	86.0%
Old District: 29	14,159	8.2%	13,750	8.7%	39	3.5%	153	6.3%
ACT 43 PLAN: SENATE. DIST. # 26								
Totals	172,596		136,983		10,989		10,919	
Old District: 16	9,435	5.5%	7,093	5.2%	976	8.9%	1,185	10.9%
Old District: 26	143,049	82.9%	113,580	82.9%	9,467	86.1%	8,840	81.0%
Old District: 27	20,112	11.7%	16,310	11.9%	546	5.0%	894	8.2%
ACT 43 PLAN: SENATE. DIST. # 27								
Totals	172,449		162,292		2,668		5,312	
Old District: 14	33,046	19.2%	30,808	19.0%	722	27.1%	1,168	22.0%
Old District: 16	11,336	6.6%	10,918	6.7%	78	2.9%	239	4.5%
Old District: 17	19,505	11.3%	18,537	11.4%	74	2.8%	966	18.2%
Old District: 26	5,538	3.2%	4,751	2.9%	261	9.8%	425	8.0%
Old District: 27	103,024	59.7%	97,278	59.9%	1,533	57.5%	2,514	47.3%
ACT 43 PLAN: SENATE. DIST. # 28								
Totals	172,218		158,426		3,489		8,445	
Old District: 3	34,352	19.9%	29,869	18.9%	1,009	28.9%	3,492	41.3%
Old District: 5	4,214	2.4%	3,836	2.4%	105	3.0%	390	4.6%
Old District: 11	261	0.2%	254	0.2%	0	0.0%	1	0.0%
Old District: 21	5	0.0%	5	0.0%	0	0.0%	0	0.0%
Old District: 28	133,386	77.5%	124,462	78.6%	2,375	68.1%	4,562	54.0%
ACT 43 PLAN: SENATE. DIST. # 29								
Totals	172,292		157,080		1,006		3,243	
Old District: 12	2,541	1.5%	2,432	1.5%	2	0.2%	86	2.7%
Old District: 23	1,238	0.7%	1,208	0.8%	0	0.0%	21	0.6%
Old District: 24	6,700	3.9%	6,551	4.2%	14	1.4%	133	4.1%
Old District: 25	13,906	8.1%	10,577	6.7%	75	7.5%	247	7.6%
Old District: 29	147,907	85.8%	136,312	86.8%	915	91.0%	2,756	85.0%
ACT 43 PLAN: SENATE. DIST. # 30								
Totals	172,798		148,056		4,029		15,722	
Old District: 1	19,716	11.4%	17,669	11.9%	189	4.7%	1,443	9.2%
Old District: 2	12,131	7.0%	11,636	7.9%	94	2.3%	240	1.5%

Core Contituencies Report: Senate Districts (Act 43)

	Population		White		Black		Hispanic	
Old District: 30	140,951	81.6%	118,751	80.2%	3,746	93.0%	14,039	89.3%
ACT 43 PLAN: SENATE. DIST. # 31								
Totals	172,338		161,670		1,344		4,326	
Old District: 10	19,375	11.2%	18,838	11.7%	42	3.1%	267	6.2%
Old District: 23	30,772	17.9%	28,006	17.3%	316	23.5%	583	13.5%
Old District: 31	122,191	70.9%	114,826	71.0%	986	73.4%	3,476	80.4%
ACT 43 PLAN: SENATE. DIST. # 32								
Totals	172,122		161,246		2,054		2,755	
Old District: 31	3,458	2.0%	3,362	2.1%	17	0.8%	66	2.4%
Old District: 32	168,664	98.0%	157,884	97.9%	2,037	99.2%	2,689	97.6%
ACT 43 PLAN: SENATE. DIST. # 33								
Totals	172,288		159,405		2,556		11,017	
Old District: 11	64,348	37.3%	61,386	38.5%	640	25.0%	1,864	16.9%
Old District: 13	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Old District: 28	5,980	3.5%	5,351	3.4%	111	4.3%	472	4.3%
Old District: 33	101,960	59.2%	92,668	58.1%	1,805	70.6%	8,681	78.8%

Plan Name: CUR00LD
 Plan Type:
 Date: 12/12/2011
 Time: 2:52:45PM
 Administrator:

Measures of Compactness

12/12/2011

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.48	1.19	275.79	0.58	5.73	0.94	0.56	0.41
2	0.41	1.77	239.75	0.30	21.83	0.43	0.18	0.49
3	0.37	1.75	117.20	0.31	3.04	0.67	0.27	0.34
4	0.42	2.37	49.87	0.14	1.19	0.81	0.62	0.25
5	0.50	1.73	119.31	0.30	9.17	0.68	0.22	0.38
6	0.38	1.94	246.64	0.25	6.70	0.57	0.17	0.23
7	0.36	2.09	25.55	0.21	0.01	0.70	0.45	0.32
8	0.63	1.49	12.49	0.39	0.32	0.81	0.60	0.41
9	0.49	1.98	19.66	0.24	0.32	0.72	0.45	0.35
10	0.26	2.09	21.51	0.22	2.21	0.71	0.28	0.34
11	0.40	1.99	19.89	0.25	1.52	0.65	0.40	0.36
12	0.45	2.05	31.54	0.23	0.81	0.66	0.40	0.40
13	0.20	2.62	30.16	0.13	2.35	0.64	0.18	0.15
14	0.38	2.10	39.53	0.21	1.51	0.60	0.32	0.35
15	0.49	1.57	15.85	0.39	0.90	0.84	0.58	0.41
16	0.43	1.93	16.01	0.27	0.14	0.68	0.44	0.22
17	0.36	1.83	16.28	0.30	1.77	0.68	0.36	0.41
18	0.41	1.93	16.43	0.26	1.49	0.68	0.42	0.37
19	0.18	2.36	25.92	0.16	4.86	0.72	0.24	0.25
20	0.55	1.73	26.35	0.31	1.10	0.79	0.54	0.42
21	0.35	1.46	124.65	0.46	30.94	0.47	0.15	0.28
22	0.27	1.61	117.56	0.38	33.56	0.48	0.13	0.20
23	0.50	1.75	45.92	0.32	0.58	0.80	0.53	0.33
24	0.48	1.50	47.12	0.42	3.70	0.89	0.42	0.47
25	0.48	1.39	89.95	0.51	9.17	0.97	0.67	0.47
26	0.42	3.50	68.17	0.06	2.03	0.89	0.83	0.16
27	0.44	1.92	162.94	0.25	9.58	0.57	0.37	0.49
28	0.44	1.60	220.11	0.36	17.57	0.77	0.58	0.37
29	0.46	1.47	147.19	0.45	8.84	0.89	0.47	0.57
30	0.28	1.68	113.95	0.32	21.11	0.93	0.64	0.38
31	0.41	1.83	150.69	0.27	7.43	0.59	0.20	0.26
32	0.40	1.53	96.79	0.42	17.74	0.84	0.54	0.39
33	0.37	2.12	90.57	0.19	9.84	0.58	0.31	0.26
34	0.49	1.33	209.93	0.56	4.02	0.95	0.75	0.46
35	0.49	1.49	233.96	0.44	7.81	0.71	0.29	0.42
36	0.47	1.77	432.63	0.27	7.52	0.61	0.24	0.43
37	0.44	1.79	141.59	0.29	5.54	0.72	0.38	0.54
38	0.39	1.66	119.32	0.34	11.53	0.83	0.41	0.32
39	0.47	1.62	135.61	0.37	6.60	0.80	0.47	0.40
40	0.59	1.41	143.28	0.45	0.34	0.92	0.74	0.62
41	0.47	1.56	183.81	0.41	4.67	0.83	0.34	0.37
42	0.49	1.53	153.34	0.41	5.73	0.87	0.62	0.36
43	0.31	2.22	178.58	0.18	10.91	0.39	0.24	0.27
44	0.42	2.69	51.76	0.11	0.63	0.92	0.89	0.31
45	0.43	1.76	103.76	0.30	2.99	0.55	0.39	0.44
46	0.35	1.93	100.24	0.25	12.07	0.51	0.18	0.26

Plan Name: CUR00LD Administrator:
Plan Type: User:

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
47	0.38	1.92	200.93	0.26	5.05	0.38	0.12	0.29
48	0.33	1.93	55.23	0.23	7.01	0.82	0.29	0.29
49	0.45	1.50	204.32	0.41	17.34	0.81	0.52	0.57
50	0.35	1.68	236.71	0.32	27.84	0.80	0.35	0.32
51	0.44	1.36	204.31	0.52	27.05	0.84	0.14	0.41
52	0.41	2.56	115.23	0.12	6.04	0.92	0.83	0.23
53	0.45	3.02	269.52	0.09	3.51	0.33	0.29	0.22
54	0.44	2.41	66.05	0.14	3.15	0.90	0.77	0.29
55	0.46	1.89	38.49	0.23	1.72	0.94	0.73	0.51
56	0.38	2.11	150.74	0.20	3.02	0.34	0.20	0.34
57	0.41	2.41	38.93	0.14	0.12	0.82	0.55	0.36
58	0.41	1.68	78.95	0.29	4.78	0.93	0.58	0.40
59	0.29	1.86	258.19	0.26	38.07	0.33	0.09	0.35
60	0.42	1.52	175.09	0.42	28.20	0.65	0.09	0.45
61	0.33	1.63	129.33	0.35	29.46	0.50	0.35	0.26
62	0.46	2.09	44.72	0.19	2.52	0.74	0.59	0.33
63	0.37	1.60	86.97	0.37	15.03	0.69	0.16	0.51
64	0.27	1.75	155.60	0.25	35.41	0.50	0.23	0.25
65	0.41	1.63	47.57	0.33	6.88	0.88	0.59	0.41
66	0.36	2.56	147.74	0.13	10.92	0.54	0.26	0.32
67	0.46	1.67	237.57	0.32	21.84	0.45	0.25	0.61
68	0.43	1.90	128.47	0.24	8.23	0.49	0.44	0.21
69	0.52	1.63	244.77	0.35	14.88	0.66	0.50	0.55
70	0.41	1.98	250.44	0.20	16.44	0.40	0.31	0.39
71	0.43	1.91	176.57	0.23	17.03	0.91	0.50	0.36
72	0.41	1.48	169.95	0.35	22.43	0.88	0.61	0.35
73	0.42	1.45	256.07	0.45	23.44	0.91	0.72	0.42
74	0.43	1.45	434.19	0.42	37.93	0.88	0.39	0.39
75	0.50	1.41	175.93	0.50	11.60	0.92	0.73	0.49
76	0.32	2.23	34.36	0.16	1.50	0.75	0.44	0.37
77	0.39	1.88	35.09	0.23	2.31	0.62	0.34	0.24
78	0.25	2.83	48.69	0.10	3.49	0.58	0.33	0.25
79	0.43	1.80	104.50	0.27	11.73	0.40	0.27	0.47
80	0.58	1.34	138.32	0.55	5.27	0.88	0.70	0.61
81	0.22	2.49	118.87	0.14	22.88	0.73	0.15	0.20
82	0.46	1.57	39.17	0.37	3.89	0.73	0.33	0.63
83	0.42	1.45	65.73	0.45	5.81	0.87	0.46	0.40
84	0.52	1.45	38.92	0.42	4.35	0.79	0.46	0.56
85	0.28	2.30	150.86	0.16	13.64	0.66	0.45	0.32
86	0.30	2.17	230.52	0.19	23.46	0.51	0.27	0.28
87	0.54	1.56	329.00	0.41	1.23	0.82	0.49	0.42
88	0.42	1.85	47.61	0.25	2.82	0.83	0.72	0.39
89	0.40	1.71	183.90	0.32	2.33	0.84	0.31	0.40
90	0.41	1.87	50.96	0.28	1.82	0.72	0.48	0.30
91	0.34	1.60	261.32	0.36	11.89	0.81	0.22	0.50
92	0.41	1.47	218.11	0.46	18.21	0.88	0.42	0.48
93	0.24	1.91	168.36	0.25	35.65	0.74	0.30	0.26
94	0.50	1.90	173.13	0.22	7.33	0.51	0.45	0.33
95	0.29	3.04	76.97	0.08	4.66	0.75	0.70	0.27
96	0.44	1.45	225.04	0.45	14.48	0.88	0.30	0.44
97	0.40	2.11	39.01	0.17	0.22	0.83	0.69	0.33
98	0.39	2.10	63.29	0.18	2.39	0.73	0.31	0.29
99	0.38	2.18	107.58	0.18	2.04	0.71	0.35	0.37
Sum	N/A	N/A	12,757.09	N/A	N/A	N/A	N/A	N/A
Min	0.18	1.19	N/A	0.06	0.01	0.33	0.09	0.15
Max	0.63	3.50	N/A	0.58	38.07	0.97	0.89	0.63

Plan Name: CUR00LD Administrator:
 Plan Type: User:

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
Mean:	0.41	1.87	N/A	0.29	9.80	0.72	0.42	0.37
Std. Dev.:	0.08	0.41	N/A	0.12	9.95	0.17	0.19	0.11

Plan Name: WISDACT43
 Plan Type:
 Date: 12/13/2011
 Time: 10:25:51AM
 Administrator:

Measures of Compactness

12/13/2011

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Pepper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.29	1.76	443.07	0.27	6.38	0.43	0.20	0.34
2	0.41	2.10	299.34	0.20	12.19	0.48	0.32	0.39
3	0.57	1.52	27.08	0.39	1.25	0.90	0.63	0.56
4	0.32	2.08	47.02	0.22	1.47	0.62	0.40	0.27
5	0.67	1.39	45.58	0.46	1.45	0.85	0.64	0.44
6	0.46	1.75	27.78	0.32	1.22	0.75	0.54	0.31
7	0.36	1.45	127.19	0.47	28.83	0.68	0.39	0.25
8	0.18	2.51	239.26	0.14	44.22	0.29	0.10	0.13
9	0.51	1.51	268.36	0.43	11.18	0.82	0.72	0.50
10	0.37	1.79	307.24	0.29	29.70	0.90	0.66	0.22
11	0.46	2.08	256.18	0.20	5.77	0.61	0.35	0.33
12	0.52	1.59	552.20	0.34	4.16	0.69	0.42	0.53
13	0.42	1.98	260.50	0.23	2.07	0.67	0.36	0.47
14	0.33	2.41	508.08	0.15	35.78	0.56	0.17	0.33
15	0.39	1.81	209.69	0.27	17.65	0.77	0.45	0.37
16	0.50	3.26	198.32	0.07	4.94	0.58	0.50	0.35
17	0.35	1.81	445.57	0.28	42.19	0.69	0.18	0.31
18	0.62	1.38	135.58	0.50	3.83	0.93	0.83	0.48
19	0.44	1.45	102.73	0.45	7.32	0.89	0.53	0.50
20	0.33	1.96	315.07	0.24	9.27	0.50	0.13	0.24
21	0.39	1.92	282.06	0.22	41.86	0.48	0.17	0.32
22	0.25	2.85	89.08	0.09	3.19	0.85	0.72	0.20
23	0.40	1.84	406.53	0.27	42.46	0.60	0.43	0.25
24	0.38	1.90	387.84	0.25	37.13	0.87	0.42	0.37
25	0.39	1.84	711.04	0.27	14.37	0.76	0.43	0.30
26	0.43	3.44	117.28	0.05	3.80	0.80	0.67	0.24
27	0.45	2.68	431.98	0.11	24.44	0.34	0.27	0.28
28	0.38	1.67	93.88	0.30	6.06	0.81	0.42	0.34
29	0.25	2.09	489.12	0.22	11.68	0.66	0.26	0.33
30	0.31	2.01	216.19	0.23	22.55	0.73	0.50	0.33
31	0.31	1.81	389.84	0.27	49.51	0.75	0.36	0.29
32	0.45	1.64	292.25	0.33	20.21	0.86	0.74	0.33
33	0.57	1.93	120.43	0.21	3.43	0.87	0.69	0.37
Sum	N/A	N/A	8,843.36	N/A	N/A	N/A	N/A	N/A
Min	0.18	1.38	N/A	0.05	1.22	0.29	0.10	0.13
Max	0.67	3.44	N/A	0.50	49.51	0.93	0.83	0.56
Mean	0.41	1.98	N/A	0.27	16.71	0.70	0.44	0.34
Std. Dev.	0.11	0.50	N/A	0.11	15.50	0.17	0.20	0.10

Plan Name: WICD00NOH20
 Plan Type:
 Date: 12/12/2011
 Time: 2:41:31PM
 Administrator:

Measures of Compactness

12/12/2011

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.47	1.69	260.59	0.32	33.05	0.86	0.48	0.45
2	0.56	1.58	348.25	0.37	19.50	0.89	0.76	0.45
3	0.31	1.57	684.09	0.37	32.30	0.87	0.40	0.27
4	0.26	2.71	109.11	0.12	9.19	0.83	0.64	0.17
5	0.39	1.95	256.36	0.25	2.47	0.62	0.42	0.37
6	0.45	1.86	564.59	0.23	39.66	0.72	0.40	0.24
7	0.49	1.79	1,130.57	0.19	9.86	0.79	0.55	0.41
8	0.40	2.30	981.58	0.13	16.69	0.84	0.63	0.30
Sum	N/A	N/A	4,335.14	N/A	N/A	N/A	N/A	N/A
Min	0.26	1.57	N/A	0.12	2.47	0.62	0.40	0.17
Max	0.56	2.71	N/A	0.37	39.66	0.89	0.76	0.45
Mean	0.42	1.93	N/A	0.25	20.34	0.80	0.53	0.33
Std. Dev.	0.10	0.39	N/A	0.10	13.34	0.09	0.13	0.10

Plan Name: ACT44NOH20
 Plan Type:
 Date: 12/12/2011
 Time: 2:15:29PM
 Administrator:

Measures of Compactness

12/12/2011

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.49	1.66	268.46	0.31	29.97	0.87	0.47	0.41
2	0.54	1.48	366.36	0.43	2.63	0.87	0.70	0.56
3	0.33	2.35	927.65	0.17	7.48	0.76	0.47	0.17
4	0.30	2.62	113.31	0.13	8.95	0.85	0.68	0.23
5	0.53	1.95	321.28	0.24	2.35	0.65	0.42	0.39
6	0.38	2.29	639.00	0.16	32.11	0.62	0.26	0.38
7	0.53	2.01	1,386.03	0.16	1.90	0.65	0.55	0.40
8	0.42	2.47	889.11	0.11	11.39	0.82	0.70	0.39
Sum	N/A	N/A	4,911.21	N/A	N/A	N/A	N/A	N/A
Min	0.30	1.48	N/A	0.11	1.90	0.62	0.26	0.17
Max	0.54	2.62	N/A	0.43	32.11	0.87	0.70	0.56
Mean	0.44	2.10	N/A	0.21	12.10	0.76	0.53	0.37
Std. Dev.	0.09	0.40	N/A	0.11	12.19	0.11	0.16	0.12

Plan Name: WI SD 2000 CURRENT
 Plan Type:
 Date: 12/13/2011
 Time: 11:43:40AM
 Administrator:

Measures of Compactness

12/13/2011

DISTRICT	Reack	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.36	1.59	441.19	0.34	0.98	0.41	0.21	0.33
2	0.43	2.11	310.92	0.21	11.25	0.51	0.32	0.28
3	0.46	2.08	36.97	0.21	0.44	0.76	0.55	0.32
4	0.35	2.25	47.45	0.19	0.94	0.65	0.36	0.35
5	0.50	1.92	46.84	0.25	0.56	0.81	0.46	0.51
6	0.41	1.95	29.15	0.26	1.01	0.75	0.48	0.37
7	0.37	1.45	126.93	0.47	28.19	0.73	0.43	0.25
8	0.20	2.10	176.57	0.22	41.37	0.36	0.12	0.15
9	0.53	1.62	178.89	0.34	6.73	0.92	0.80	0.51
10	0.35	1.86	343.88	0.26	44.01	0.88	0.72	0.27
11	0.47	2.09	236.17	0.21	14.49	0.59	0.35	0.29
12	0.52	1.57	532.62	0.35	13.21	0.61	0.46	0.51
13	0.41	1.72	233.38	0.32	17.66	0.82	0.23	0.47
14	0.31	1.97	365.85	0.24	29.03	0.77	0.20	0.27
15	0.50	1.36	132.06	0.52	10.62	0.97	0.71	0.63
16	0.41	2.26	273.83	0.18	13.04	0.36	0.29	0.23
17	0.36	1.62	404.98	0.34	47.70	0.75	0.18	0.46
18	0.59	1.49	143.60	0.43	3.51	0.93	0.82	0.38
19	0.43	1.43	102.83	0.49	3.02	0.88	0.52	0.46
20	0.50	1.50	277.19	0.42	24.01	0.61	0.15	0.43
21	0.22	1.61	152.88	0.38	51.88	0.93	0.13	0.17
22	0.22	1.63	173.18	0.32	50.96	0.85	0.21	0.16
23	0.35	1.84	393.12	0.28	48.36	0.62	0.42	0.28
24	0.54	1.55	285.36	0.37	13.03	0.93	0.69	0.43
25	0.40	1.65	616.35	0.33	16.63	0.87	0.52	0.42
26	0.36	2.29	67.06	0.16	0.25	0.78	0.59	0.37
27	0.45	2.00	259.89	0.23	12.69	0.44	0.37	0.41
28	0.44	1.66	97.04	0.33	5.87	0.78	0.49	0.33
29	0.29	2.19	531.61	0.21	28.74	0.70	0.25	0.32
30	0.42	1.86	213.57	0.27	10.09	0.84	0.68	0.36
31	0.33	1.68	406.37	0.32	41.51	0.80	0.32	0.36
32	0.50	1.45	261.34	0.43	20.11	0.90	0.82	0.46
33	0.35	2.42	144.65	0.15	11.53	0.72	0.39	0.25
Sum	N/A	N/A	8,043.75	N/A	N/A	N/A	N/A	N/A
Min	0.20	1.36	N/A	0.15	0.25	0.36	0.12	0.15
Max	0.59	2.42	N/A	0.52	51.88	0.97	0.82	0.63
Mean	0.40	1.81	N/A	0.30	18.89	0.73	0.43	0.36
Std. Dev.	0.10	0.29	N/A	0.10	16.76	0.17	0.21	0.11

Plan Name: WISDACT43
 Plan Type:
 Date: 12/13/2011
 Time: 10:25:51AM
 Administrator:

Measures of Compactness

12/13/2011

DISTRICT	Reock	Schwartzberg	Perimeter	Polsby-Popper	Length-Width	Population Polygon	Population Circle	Ehrenburg
1	0.29	1.76	443.07	0.27	6.38	0.43	0.20	0.34
2	0.41	2.10	299.34	0.20	12.19	0.48	0.32	0.39
3	0.57	1.52	27.08	0.39	1.25	0.90	0.63	0.56
4	0.32	2.08	47.02	0.22	1.47	0.62	0.40	0.27
5	0.67	1.39	45.58	0.46	1.45	0.85	0.64	0.44
6	0.46	1.75	27.78	0.32	1.22	0.75	0.54	0.31
7	0.36	1.45	127.19	0.47	28.83	0.68	0.39	0.25
8	0.18	2.51	239.26	0.14	44.22	0.29	0.10	0.13
9	0.51	1.51	268.36	0.43	11.18	0.82	0.72	0.50
10	0.37	1.79	307.24	0.29	29.70	0.90	0.66	0.22
11	0.46	2.08	256.18	0.20	5.77	0.61	0.35	0.33
12	0.52	1.59	552.20	0.34	4.16	0.69	0.42	0.53
13	0.42	1.98	260.50	0.23	2.07	0.67	0.36	0.47
14	0.33	2.41	508.08	0.15	35.78	0.56	0.17	0.33
15	0.39	1.81	209.69	0.27	17.65	0.77	0.45	0.37
16	0.50	3.26	198.32	0.07	4.94	0.58	0.50	0.35
17	0.35	1.81	445.57	0.28	42.19	0.69	0.18	0.31
18	0.62	1.38	135.58	0.50	3.83	0.93	0.83	0.48
19	0.44	1.45	102.73	0.45	7.32	0.89	0.53	0.50
20	0.33	1.96	315.07	0.24	9.27	0.50	0.13	0.24
21	0.39	1.92	282.06	0.22	41.86	0.48	0.17	0.32
22	0.25	2.85	89.08	0.09	3.19	0.85	0.72	0.20
23	0.40	1.84	406.53	0.27	42.46	0.60	0.43	0.25
24	0.38	1.90	387.84	0.25	37.13	0.87	0.42	0.37
25	0.39	1.84	711.04	0.27	14.37	0.76	0.43	0.30
26	0.43	3.44	117.28	0.05	3.80	0.80	0.67	0.24
27	0.45	2.68	431.98	0.11	24.44	0.34	0.27	0.28
28	0.38	1.67	193.88	0.30	6.06	0.81	0.42	0.34
29	0.25	2.09	489.12	0.22	11.68	0.66	0.26	0.33
30	0.31	2.01	216.19	0.23	22.55	0.73	0.50	0.33
31	0.31	1.81	389.84	0.27	49.51	0.75	0.36	0.29
32	0.45	1.64	292.25	0.33	20.21	0.86	0.74	0.33
33	0.57	1.93	120.43	0.21	3.43	0.87	0.69	0.37
Sum	N/A	N/A	8,843.36	N/A	N/A	N/A	N/A	N/A
Min	0.18	1.38	N/A	0.05	1.22	0.29	0.10	0.13
Max	0.67	3.44	N/A	0.50	49.51	0.93	0.83	0.56
Mean	0.41	1.98	N/A	0.27	16.71	0.70	0.44	0.34
Std. Dev:	0.11	0.50	N/A	0.11	15.50	0.17	0.20	0.10

AREA-BASED MEASURES OF COM

DISTRICT	C_Reock	A_Reock	D_Reock	C_Polsby-Popper	A_Polsby-Popper	D_Polsby-Popper	C_Population Polygon	A_Population Polygon
1	0.48	0.47	-0.01	0.58	0.54	-0.04	0.94	0.88
2	0.41	0.40	-0.02	0.30	0.22	-0.08	0.43	0.67
3	0.37	0.48	0.11	0.31	0.29	-0.02	0.67	0.62
4	0.42	0.35	-0.07	0.14	0.16	0.02	0.81	0.58
5	0.50	0.47	-0.03	0.30	0.26	-0.04	0.68	0.44
6	0.38	0.40	0.02	0.25	0.22	-0.03	0.57	0.62
7	0.36	0.27	-0.10	0.21	0.20	-0.01	0.70	0.63
8	0.63	0.42	-0.21	0.39	0.42	0.03	0.81	0.91
9	0.49	0.28	-0.22	0.24	0.24	0.00	0.72	0.69
10	0.26	0.38	0.12	0.22	0.18	-0.05	0.71	0.67
11	0.40	0.36	-0.04	0.25	0.19	-0.05	0.65	0.67
12	0.45	0.34	-0.11	0.23	0.32	0.10	0.66	0.68
13	0.20	0.29	0.09	0.13	0.30	0.16	0.64	0.84
14	0.38	0.31	-0.07	0.21	0.32	0.11	0.60	0.68
15	0.49	0.30	-0.19	0.39	0.39	-0.01	0.84	0.81
16	0.43	0.40	-0.03	0.27	0.32	0.05	0.68	0.65
17	0.36	0.49	0.13	0.30	0.38	0.08	0.68	0.71
18	0.41	0.39	-0.02	0.26	0.31	0.05	0.68	0.72
19	0.18	0.27	0.09	0.16	0.29	0.13	0.72	0.86
20	0.55	0.51	-0.04	0.31	0.42	0.11	0.79	0.77
21	0.35	0.35	0.00	0.46	0.48	0.02	0.47	0.45
22	0.27	0.29	0.02	0.38	0.19	-0.19	0.48	0.62
23	0.50	0.24	-0.26	0.32	0.26	-0.06	0.80	0.46
24	0.48	0.35	-0.13	0.42	0.31	-0.11	0.89	0.56
25	0.48	0.34	-0.14	0.51	0.35	-0.16	0.97	0.66
26	0.42	0.39	-0.03	0.06	0.36	0.31	0.89	0.66
27	0.44	0.53	0.09	0.25	0.25	0.00	0.57	0.65
28	0.44	0.43	-0.01	0.36	0.36	0.00	0.77	0.79
29	0.46	0.37	-0.09	0.45	0.38	-0.07	0.89	0.86
30	0.28	0.48	0.20	0.32	0.56	0.24	0.93	0.98
31	0.41	0.55	0.14	0.27	0.26	-0.02	0.59	0.49
32	0.40	0.51	0.11	0.42	0.20	-0.21	0.84	0.60
33	0.37	0.29	-0.07	0.19	0.19	0.00	0.58	0.65
34	0.49	0.37	-0.12	0.56	0.35	-0.21	0.95	0.89
35	0.49	0.43	-0.06	0.44	0.45	0.01	0.71	0.56
36	0.47	0.61	0.14	0.27	0.33	0.07	0.61	0.69
37	0.44	0.23	-0.21	0.29	0.16	-0.14	0.72	0.58
38	0.39	0.32	-0.07	0.34	0.22	-0.12	0.83	0.60
39	0.47	0.52	0.05	0.37	0.33	-0.04	0.80	0.90
40	0.39	0.44	-0.15	0.45	0.32	-0.12	0.92	0.83
41	0.47	0.37	-0.11	0.41	0.26	-0.15	0.83	0.82
42	0.49	0.41	-0.08	0.41	0.21	-0.20	0.87	0.47
43	0.31	0.41	0.10	0.18	0.14	-0.04	0.39	0.36

44	0.42	0.39	-0.04	0.11	0.06	-0.04	0.92	0.95
45	0.43	0.47	0.03	0.30	0.43	0.14	0.55	0.88
46	0.35	0.28	-0.07	0.25	0.21	-0.04	0.51	0.85
47	0.38	0.45	0.07	0.26	0.09	-0.17	0.38	0.31
48	0.33	0.42	0.10	0.23	0.05	-0.18	0.82	0.73
49	0.45	0.34	-0.11	0.41	0.35	-0.06	0.81	0.85
50	0.35	0.35	-0.01	0.32	0.26	-0.05	0.80	0.79
51	0.44	0.35	-0.09	0.52	0.36	-0.16	0.84	0.75
52	0.41	0.34	-0.08	0.12	0.38	0.26	0.92	0.85
53	0.45	0.42	-0.02	0.09	0.18	0.09	0.33	0.42
54	0.44	0.44	0.00	0.14	0.14	0.01	0.90	0.93
55	0.46	0.54	0.08	0.23	0.46	0.23	0.94	0.71
56	0.38	0.31	-0.07	0.20	0.19	-0.01	0.34	0.30
57	0.41	0.39	-0.02	0.14	0.39	0.25	0.82	0.77
58	0.41	0.45	0.04	0.29	0.15	-0.14	0.93	0.91
59	0.29	0.31	0.02	0.26	0.21	-0.05	0.33	0.43
60	0.42	0.44	0.02	0.42	0.35	-0.07	0.65	0.52
61	0.33	0.20	-0.12	0.35	0.18	-0.16	0.50	0.35
62	0.46	0.21	-0.25	0.19	0.32	0.12	0.74	0.38
63	0.37	0.32	-0.05	0.37	0.33	-0.03	0.69	0.86
64	0.27	0.21	-0.06	0.25	0.08	-0.17	0.50	0.59
65	0.41	0.54	0.13	0.33	0.29	-0.04	0.88	0.91
66	0.36	0.38	0.01	0.13	0.22	0.09	0.54	0.75
67	0.46	0.48	0.02	0.32	0.32	0.00	0.45	0.39
68	0.43	0.56	0.13	0.24	0.27	0.03	0.49	0.53
69	0.52	0.45	-0.06	0.35	0.42	0.07	0.66	0.81
70	0.41	0.25	-0.16	0.20	0.17	-0.03	0.40	0.42
71	0.43	0.52	0.09	0.23	0.27	0.04	0.91	0.89
72	0.41	0.50	0.10	0.35	0.41	0.05	0.88	0.88
73	0.42	0.36	-0.06	0.45	0.34	-0.11	0.91	0.91
74	0.43	0.47	0.04	0.42	0.38	-0.04	0.88	0.79
75	0.50	0.40	-0.10	0.50	0.43	-0.07	0.92	0.87
76	0.32	0.23	-0.10	0.16	0.25	0.09	0.75	0.92
77	0.39	0.47	0.08	0.23	0.08	-0.15	0.62	0.43
78	0.25	0.55	0.30	0.10	0.07	-0.03	0.58	0.87
79	0.43	0.40	-0.03	0.27	0.06	-0.21	0.40	0.20
80	0.58	0.60	0.03	0.55	0.36	-0.19	0.88	0.37
81	0.22	0.40	0.18	0.14	0.26	0.12	0.73	0.80
82	0.46	0.48	0.02	0.37	0.44	0.07	0.73	0.80
83	0.42	0.33	-0.08	0.45	0.23	-0.21	0.87	0.60
84	0.52	0.30	-0.22	0.42	0.33	-0.09	0.79	0.73
85	0.28	0.42	0.14	0.16	0.20	0.03	0.66	0.67
86	0.30	0.33	0.03	0.19	0.16	-0.03	0.51	0.50
87	0.54	0.33	-0.20	0.41	0.35	-0.05	0.82	0.68
88	0.42	0.32	-0.10	0.25	0.21	-0.04	0.83	0.65
89	0.40	0.41	0.02	0.32	0.39	0.07	0.84	0.87
90	0.41	0.44	0.03	0.28	0.29	0.01	0.72	0.74

91	0.34	0.42	0.08	0.36	0.08	-0.28	0.81	0.87
92	0.41	0.43	0.02	0.46	0.46	0.00	0.88	0.90
93	0.24	0.30	0.06	0.25	0.19	-0.06	0.74	0.38
94	0.50	0.55	0.05	0.22	0.24	0.02	0.51	0.50
95	0.29	0.24	-0.05	0.08	0.09	0.01	0.75	0.78
96	0.44	0.37	-0.07	0.45	0.35	-0.10	0.88	0.67
97	0.40	0.39	-0.01	0.17	0.25	0.08	0.83	0.85
98	0.39	0.44	0.05	0.18	0.28	0.10	0.79	0.82
99	0.38	0.39	0.01	0.18	0.31	0.12	0.71	0.80
Sum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.18	0.20	0.02	0.06	0.05	-0.01	0.33	0.20
Max	0.63	0.61	0.02	0.58	0.56	-0.02	0.97	0.98
Mean	0.41	0.39	0.02	0.29	0.28	-0.02	0.72	0.69
Std. Dev.	0.08	0.09	-0.01	0.12	0.11	-0.01	0.17	0.18

Each measure of compactness is preceded with a "C_", "A_" or a "D_". The "C_" indicates the c

PACTNESS

D_Population Polygon	C_Population Circle	A_Population Circle	D_Population Circle	C_Ehrenburg	A_Ehrenburg	D_Ehrenburg	C_Schwartzberg	A_Schwartzberg
-0.06	0.56	0.49	-0.07	0.41	0.40	-0.01	1.19	1.24
0.24	0.18	0.25	0.05	0.49	0.28	-0.21	1.77	2.02
-0.05	0.27	0.32	0.04	0.34	0.32	-0.03	1.75	1.78
-0.23	0.62	0.39	-0.23	0.25	0.27	0.02	2.37	2.29
-0.24	0.22	0.20	-0.01	0.38	0.58	0.20	1.73	1.79
0.04	0.17	0.45	0.28	0.23	0.16	-0.07	1.94	2.04
-0.08	0.45	0.21	-0.23	0.32	0.27	-0.04	2.09	2.18
0.10	0.60	0.48	-0.13	0.41	0.31	-0.10	1.49	1.44
-0.03	0.45	0.32	-0.13	0.35	0.25	-0.10	1.98	2.00
-0.05	0.28	0.51	0.23	0.34	0.20	-0.14	2.09	2.30
0.02	0.40	0.33	-0.06	0.36	0.36	-0.01	1.99	2.19
0.02	0.40	0.35	-0.05	0.40	0.42	0.03	2.05	1.72
0.20	0.18	0.25	0.07	0.15	0.27	0.12	2.62	1.74
0.09	0.32	0.26	-0.06	0.35	0.29	-0.06	2.10	1.69
-0.03	0.58	0.36	-0.22	0.41	0.24	-0.17	1.57	1.56
-0.03	0.44	0.36	-0.08	0.22	0.23	0.01	1.93	1.75
0.03	0.36	0.48	0.12	0.41	0.51	0.09	1.83	1.62
0.04	0.42	0.43	0.01	0.37	0.32	-0.05	1.93	1.77
0.14	0.24	0.34	0.10	0.25	0.26	0.01	2.36	1.76
-0.02	0.54	0.46	-0.08	0.42	0.67	0.25	1.73	1.51
-0.02	0.15	0.14	-0.01	0.28	0.28	0.00	1.46	1.44
0.14	0.13	0.23	0.11	0.20	0.24	0.04	1.61	2.15
-0.34	0.53	0.11	-0.41	0.33	0.18	-0.15	1.75	1.88
-0.34	0.42	0.19	-0.23	0.47	0.41	-0.06	1.50	1.78
-0.31	0.67	0.14	-0.52	0.47	0.40	-0.07	1.39	1.67
-0.23	0.83	0.38	-0.45	0.16	0.51	0.35	3.50	1.60
0.08	0.37	0.54	0.18	0.49	0.54	0.04	1.92	1.87
0.02	0.58	0.61	0.03	0.37	0.38	0.00	1.60	1.59
-0.04	0.47	0.41	-0.07	0.57	0.40	-0.17	1.47	1.59
0.05	0.64	0.85	0.21	0.38	0.52	0.14	1.68	1.32
-0.10	0.20	0.34	0.14	0.26	0.44	0.18	1.83	1.87
-0.24	0.54	0.48	-0.06	0.39	0.35	-0.04	1.53	2.09
0.07	0.31	0.26	-0.06	0.26	0.33	0.07	2.12	2.07
-0.06	0.75	0.65	-0.09	0.46	0.46	0.00	1.33	1.57
-0.15	0.29	0.27	-0.02	0.42	0.38	-0.04	1.49	1.48
0.09	0.24	0.44	0.20	0.43	0.45	0.02	1.77	1.63
-0.14	0.38	0.20	-0.19	0.54	0.21	-0.33	1.79	2.37
-0.24	0.41	0.31	-0.09	0.32	0.28	-0.03	1.66	2.01
0.10	0.47	0.51	0.04	0.40	0.31	-0.10	1.62	1.68
-0.09	0.74	0.40	-0.34	0.62	0.32	-0.31	1.41	1.70
-0.02	0.34	0.43	0.08	0.37	0.25	-0.12	1.56	1.86
-0.40	0.62	0.18	-0.44	0.36	0.35	-0.01	1.53	2.05
-0.03	0.24	0.25	0.01	0.27	0.24	-0.04	2.22	2.36

0.03	0.89	0.87	-0.02	0.31	0.24	-0.07	2.69	3.16
0.33	0.39	0.46	0.07	0.44	0.58	0.14	1.76	1.51
0.34	0.18	0.21	0.04	0.26	0.23	-0.02	1.93	2.08
-0.07	0.12	0.25	0.13	0.29	0.35	0.06	1.92	3.04
-0.08	0.29	0.49	0.20	0.29	0.14	-0.15	1.93	3.66
0.04	0.52	0.43	-0.09	0.57	0.52	-0.04	1.50	1.63
-0.01	0.35	0.34	-0.01	0.32	0.33	0.01	1.68	1.83
-0.09	0.14	0.10	-0.04	0.41	0.23	-0.18	1.36	1.63
-0.07	0.83	0.69	-0.14	0.23	0.24	0.01	2.56	1.60
0.09	0.29	0.28	-0.01	0.22	0.26	0.04	3.02	2.17
0.03	0.77	0.77	-0.01	0.29	0.28	-0.01	2.41	2.28
-0.23	0.73	0.42	-0.31	0.51	0.32	-0.18	1.89	1.47
-0.04	0.20	0.18	-0.02	0.34	0.43	0.09	2.11	2.24
-0.06	0.55	0.58	0.03	0.36	0.35	0.00	2.41	1.58
-0.03	0.58	0.77	0.19	0.40	0.31	-0.09	1.68	2.15
0.10	0.09	0.18	0.09	0.35	0.24	-0.11	1.86	2.05
-0.13	0.09	0.07	-0.02	0.45	0.40	-0.05	1.52	1.59
-0.15	0.35	0.12	-0.23	0.26	0.18	-0.08	1.63	2.10
-0.36	0.59	0.05	-0.54	0.33	0.21	-0.12	2.09	1.77
0.17	0.16	0.35	0.19	0.51	0.22	-0.29	1.60	1.67
0.08	0.23	0.31	0.08	0.25	0.26	0.01	1.75	3.06
0.03	0.59	0.74	0.15	0.41	0.41	0.00	1.63	1.76
0.21	0.26	0.58	0.32	0.32	0.34	0.02	2.56	1.99
-0.06	0.25	0.26	0.02	0.61	0.35	-0.26	1.67	1.65
0.04	0.44	0.38	-0.06	0.21	0.57	0.36	1.90	1.80
0.15	0.50	0.66	0.16	0.55	0.37	-0.19	1.63	1.51
0.01	0.31	0.19	-0.12	0.39	0.23	-0.16	1.98	2.24
-0.02	0.50	0.70	0.20	0.36	0.34	-0.02	1.91	1.78
0.00	0.61	0.52	-0.09	0.35	0.51	0.16	1.48	1.42
0.00	0.72	0.66	-0.07	0.42	0.42	0.00	1.45	1.66
-0.09	0.39	0.43	0.04	0.39	0.38	-0.01	1.45	1.53
-0.06	0.73	0.50	-0.23	0.49	0.49	0.00	1.41	1.51
0.18	0.44	0.66	0.22	0.37	0.25	-0.12	2.23	1.88
-0.19	0.34	0.33	-0.01	0.24	0.22	-0.02	1.88	3.04
0.29	0.33	0.73	0.40	0.25	0.17	-0.08	2.83	2.88
-0.21	0.27	0.16	-0.12	0.47	0.24	-0.22	1.80	3.48
-0.51	0.70	0.20	-0.50	0.61	0.35	-0.26	1.34	1.58
0.07	0.15	0.30	0.14	0.20	0.31	0.11	2.49	1.82
0.07	0.33	0.40	0.07	0.63	0.58	-0.05	1.57	1.47
-0.27	0.46	0.28	-0.19	0.40	0.27	-0.13	1.45	1.85
-0.06	0.46	0.29	-0.18	0.56	0.31	-0.25	1.45	1.67
0.00	0.45	0.55	0.10	0.32	0.39	0.06	2.30	2.07
-0.01	0.27	0.34	0.08	0.28	0.33	0.04	2.17	2.32
-0.14	0.49	0.23	-0.25	0.42	0.42	0.00	1.56	1.67
-0.18	0.72	0.31	-0.41	0.39	0.25	-0.15	1.85	2.03
0.03	0.31	0.41	0.10	0.40	0.37	-0.03	1.71	1.58
0.02	0.48	0.58	0.10	0.30	0.50	0.20	1.87	1.79

0.07	0.22	0.78	0.56	0.50	0.36	-0.13	1.60	2.83
0.02	0.42	0.23	-0.19	0.48	0.47	0.00	1.47	1.40
-0.36	0.30	0.20	-0.10	0.26	0.36	0.11	1.91	2.10
-0.01	0.45	0.45	-0.01	0.33	0.38	0.06	1.90	1.80
0.03	0.70	0.70	0.00	0.27	0.19	-0.09	3.04	2.80
-0.21	0.30	0.25	-0.05	0.44	0.34	-0.10	1.45	1.61
0.01	0.69	0.54	-0.15	0.33	0.31	-0.02	2.11	1.76
0.09	0.31	0.49	0.17	0.29	0.58	0.29	2.10	1.74
0.09	0.35	0.32	-0.03	0.37	0.30	-0.07	2.18	1.69
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-0.13	0.09	0.05	-0.04	0.15	0.14	-0.01	1.19	1.24
0.01	0.89	0.87	-0.02	0.63	0.67	0.04	3.50	3.66
-0.03	0.42	0.39	-0.03	0.37	0.34	-0.03	1.87	1.92
0.01	0.19	0.19	0.00	0.11	0.11	0.01	0.41	0.46

calculated measure of compactness for the current plan. The "A_" indicates the calculated measure of compac

PERIMETER-BASED MEASURES OF COMPACTNESS						
D_Schwartzberg	C_Perimeter	A_Perimeter	D_Perimeter	C_Length-Width	A_Length-Width	D_Length-Width
-0.05	275.79	289.30	-13.51	5.73	0.13	5.60
-0.25	239.75	153.44	86.31	21.83	10.77	11.06
-0.02	117.20	99.80	17.40	3.04	3.90	-0.86
0.09	49.87	48.98	0.89	1.19	2.02	-0.83
-0.07	119.31	131.24	-11.93	9.17	1.82	7.35
-0.11	246.64	240.59	6.05	6.70	10.65	-3.94
-0.10	25.55	25.89	-0.34	0.01	2.59	-2.58
0.05	12.49	13.07	-0.58	0.32	2.16	-1.84
-0.02	19.66	18.66	1.01	0.32	3.11	-2.78
-0.21	21.51	24.02	-2.51	2.21	0.91	1.30
-0.21	19.89	30.45	-10.56	1.52	0.43	1.09
0.33	31.54	25.94	5.60	0.81	4.04	-3.23
0.88	30.16	32.94	-2.78	2.35	7.41	-5.07
0.40	39.53	33.24	6.29	1.51	5.90	-4.38
0.01	15.85	27.11	-11.27	0.90	6.04	-5.14
0.17	16.01	16.26	-0.26	0.14	0.96	-0.82
0.21	16.28	15.48	0.80	1.77	0.32	1.45
0.16	16.43	15.05	1.38	1.49	1.14	0.35
0.61	25.92	20.96	4.96	4.86	3.57	1.29
0.22	26.35	23.56	2.79	1.10	1.67	-0.58
0.02	124.65	122.22	2.43	30.94	31.45	-0.51
-0.54	117.56	86.21	31.35	33.56	6.25	27.30
-0.13	45.92	149.91	-103.99	0.58	23.23	-22.65
-0.28	47.12	56.93	-9.82	3.70	3.42	0.28
-0.28	89.95	215.44	-125.49	9.17	35.21	-26.03
1.90	68.17	176.63	-108.47	2.03	23.92	-21.88
0.05	162.94	115.18	47.76	9.58	0.13	9.44
0.01	220.11	210.81	9.29	17.57	23.56	-5.98
-0.12	147.19	142.97	4.22	8.84	11.82	-2.98
0.37	113.95	74.05	39.90	21.11	5.93	15.18
-0.04	150.69	139.72	10.98	7.43	9.62	-2.19
-0.56	96.79	134.28	-37.49	17.74	0.95	16.79
0.05	90.57	149.10	-58.52	9.84	17.17	-7.33
-0.24	209.93	320.98	-111.05	4.02	44.01	-39.99
0.01	233.96	244.14	-10.18	7.81	6.07	1.74
0.13	432.63	347.32	85.31	7.52	9.12	-1.59
-0.58	141.59	165.39	-23.80	5.54	24.17	-18.64
-0.35	119.32	151.04	-31.72	11.53	17.87	-6.34
-0.05	135.61	134.17	1.44	6.60	4.45	2.15
-0.28	143.28	191.00	-47.72	0.34	21.57	-21.23
-0.30	183.81	227.85	-44.04	4.67	30.72	-26.06
-0.52	153.34	257.59	-104.25	5.73	6.51	-0.78
-0.14	178.58	210.08	-31.50	10.91	12.73	-1.82

-0.47	51.76	77.20	-25.44	0.63	3.23	-2.60
0.26	103.76	110.48	-6.72	2.99	6.08	-3.09
-0.15	100.24	84.64	15.60	12.07	15.02	-2.95
-1.13	200.93	108.07	92.86	5.05	2.41	2.64
-1.73	55.23	84.81	-29.58	7.01	1.06	5.95
-0.13	204.32	229.82	-25.49	17.34	31.56	-14.22
-0.15	236.71	255.81	-19.10	27.84	27.84	0.00
-0.27	204.31	233.32	-29.01	27.05	25.02	2.03
0.96	115.23	81.47	33.76	6.04	2.99	3.05
0.86	269.52	181.72	87.80	3.51	9.89	-6.38
0.13	66.05	65.85	0.20	3.15	3.52	-0.37
0.42	38.49	50.54	-12.05	1.72	0.00	1.72
-0.13	150.74	132.06	18.68	3.02	7.32	-4.30
0.83	38.93	23.85	15.08	0.12	0.37	-0.25
-0.47	78.95	87.42	-8.47	4.78	4.28	0.50
-0.18	258.19	197.26	60.93	38.07	24.57	13.49
-0.06	175.09	203.77	-28.68	28.20	29.21	-1.02
-0.47	129.33	217.29	-87.96	29.46	53.27	-23.81
0.32	44.72	150.79	-106.07	2.52	45.86	-43.34
-0.07	86.97	78.30	8.68	15.03	14.00	1.03
-1.31	155.60	73.55	82.06	35.41	0.80	34.60
-0.13	47.57	22.89	24.68	6.88	1.03	5.85
0.56	147.74	26.79	120.95	10.92	0.53	10.39
0.02	237.57	229.84	7.74	21.84	15.99	5.85
0.11	128.47	234.06	-105.59	8.23	11.06	-2.83
0.12	244.77	180.09	64.68	14.88	0.13	14.76
-0.26	250.44	334.28	-83.84	16.44	19.24	-2.80
0.13	176.57	152.94	23.63	17.03	5.62	11.41
0.06	169.95	169.71	0.25	22.43	11.25	11.18
-0.22	256.07	284.90	-28.82	23.44	29.86	-6.42
-0.08	434.19	479.70	-45.50	37.93	38.55	-0.62
-0.10	175.93	208.90	-32.97	11.60	23.35	-11.75
0.35	34.36	18.20	16.16	1.50	0.04	1.46
-1.15	35.09	70.49	-35.40	2.31	1.97	0.34
-0.05	48.69	60.56	-11.87	3.49	0.96	2.53
-1.68	104.50	203.00	-98.50	11.73	2.76	8.96
-0.24	138.32	161.63	-23.31	5.27	6.05	-0.79
0.67	118.87	184.75	-65.88	22.88	8.50	14.38
0.10	39.17	34.45	4.73	3.89	2.96	0.93
-0.40	65.73	85.06	-19.33	5.81	2.18	3.63
-0.22	38.92	34.51	4.41	4.35	6.39	-2.03
0.23	150.86	148.66	2.20	13.64	1.53	12.11
-0.15	230.52	215.86	14.67	23.46	2.64	20.82
-0.11	329.00	343.89	-14.89	1.23	5.11	-3.88
-0.18	47.61	68.71	-21.10	2.82	7.71	-4.89
0.13	183.90	156.44	27.46	2.33	7.95	-5.61
0.08	50.96	34.52	16.43	1.82	2.94	-1.11

-1.22	261.32	65.68	195.64	11.89	0.46	11.43
0.08	218.11	231.09	-12.98	18.21	33.39	-15.19
-0.19	168.36	286.18	-117.82	35.65	40.46	-4.81
0.10	173.13	152.98	20.15	7.33	0.47	6.87
0.24	76.97	73.87	3.10	4.66	1.95	2.72
-0.17	225.04	250.98	-25.94	14.48	20.63	-6.15
0.35	39.01	51.52	-12.51	0.22	0.20	0.02
0.36	63.29	46.34	16.94	2.39	3.87	-1.48
0.49	107.58	77.46	30.11	2.04	5.65	-3.60
N/A	12,757.09	13,417.97	-660.88	N/A	N/A	N/A
-0.05	N/A	N/A	N/A	0.01	0.00	0.01
-0.16	N/A	N/A	N/A	38.07	53.27	-15.20
-0.05	N/A	N/A	N/A	9.80	10.82	-1.02
-0.05	N/A	N/A	N/A	9.95	12.29	-2.34

ness for plan as proposed by Act 43. The "D_" indicates the difference.

AREA-BASED MEASURES OF COM

DISTRICT	C_Reock	A_Reock	D_Reock	C_Polsby-Popper	A_Polsby-Popper	D_Polsby-Popper	C_Population Polygon	A_Population Polygon
1	0.36	0.29	-0.07	0.34	0.27	-0.07	0.41	0.43
2	0.43	0.41	-0.02	0.21	0.20	-0.01	0.51	0.48
3	0.46	0.57	0.11	0.21	0.39	0.18	0.76	0.90
4	0.35	0.32	-0.03	0.19	0.22	0.04	0.65	0.62
5	0.50	0.67	0.17	0.25	0.46	0.21	0.81	0.85
6	0.41	0.46	0.05	0.26	0.32	0.06	0.75	0.75
7	0.37	0.36	0.00	0.47	0.47	0.00	0.73	0.68
8	0.20	0.18	-0.02	0.22	0.14	-0.08	0.36	0.29
9	0.53	0.51	-0.02	0.34	0.43	0.08	0.92	0.82
10	0.35	0.37	0.02	0.26	0.29	0.02	0.88	0.90
11	0.47	0.46	-0.01	0.21	0.20	-0.01	0.59	0.61
12	0.52	0.52	0.00	0.35	0.34	-0.01	0.61	0.69
13	0.41	0.42	0.01	0.32	0.23	-0.10	0.82	0.67
14	0.31	0.33	0.02	0.24	0.15	-0.09	0.77	0.56
15	0.50	0.39	-0.11	0.52	0.27	-0.25	0.97	0.77
16	0.41	0.50	0.09	0.18	0.07	-0.11	0.36	0.58
17	0.36	0.35	-0.01	0.34	0.28	-0.07	0.75	0.69
18	0.59	0.62	0.03	0.43	0.50	0.07	0.93	0.93
19	0.43	0.44	0.01	0.49	0.45	-0.04	0.88	0.89
20	0.50	0.33	-0.17	0.42	0.24	-0.18	0.61	0.50
21	0.22	0.39	0.17	0.38	0.22	-0.16	0.93	0.48
22	0.22	0.25	0.03	0.32	0.09	-0.23	0.85	0.85
23	0.35	0.40	0.05	0.28	0.27	0.00	0.62	0.60
24	0.54	0.38	-0.16	0.37	0.25	-0.12	0.93	0.87
25	0.40	0.39	-0.01	0.33	0.27	-0.06	0.87	0.76
26	0.36	0.43	0.07	0.16	0.05	-0.10	0.78	0.80
27	0.45	0.45	0.00	0.23	0.11	-0.12	0.44	0.34
28	0.44	0.38	-0.05	0.33	0.30	-0.04	0.78	0.81
29	0.29	0.25	-0.04	0.21	0.22	0.02	0.70	0.66
30	0.42	0.31	-0.11	0.27	0.23	-0.03	0.84	0.73
31	0.33	0.31	-0.02	0.32	0.27	-0.06	0.80	0.75
32	0.50	0.45	-0.05	0.43	0.33	-0.10	0.90	0.86
33	0.35	0.57	0.22	0.15	0.21	0.07	0.72	0.87
Sum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.20	0.18	-0.02	0.15	0.05	-0.09	0.36	0.29
Max	0.59	0.67	0.08	0.52	0.50	-0.02	0.97	0.93
Mean	0.40	0.41	0.00	0.30	0.27	-0.04	0.73	0.70
Std. Dev.	0.10	0.11	0.01	0.10	0.11	0.01	0.17	0.17

Each measure of compactness is preceded with a "C_", "A_" or a "D_". The "C_" indicates the

IPACTNESS

D_Population Polygon	C_Population Circle	A_Population Circle	D_Population Circle	C_Ehrenburg	A_Ehrenburg	D_Ehrenburg	C_Schwartzberg	A_Schwartzberg
0.01	0.21	0.20	-0.01	0.33	0.34	0.01	1.59	1.76
-0.03	0.32	0.32	0.00	0.28	0.39	0.11	2.11	2.10
0.14	0.55	0.63	0.08	0.32	0.56	0.25	2.08	1.52
-0.04	0.36	0.40	0.05	0.35	0.27	-0.07	2.25	2.08
0.04	0.46	0.64	0.19	0.51	0.44	-0.07	1.92	1.39
0.00	0.48	0.54	0.06	0.37	0.31	-0.05	1.95	1.75
-0.05	0.43	0.39	-0.04	0.25	0.25	0.00	1.45	1.45
-0.07	0.12	0.10	-0.02	0.15	0.13	-0.02	2.10	2.51
-0.10	0.80	0.72	-0.08	0.51	0.50	-0.01	1.62	1.51
0.02	0.72	0.66	-0.06	0.27	0.22	-0.04	1.86	1.79
0.03	0.35	0.35	0.00	0.29	0.33	0.04	2.09	2.08
0.08	0.46	0.42	-0.03	0.51	0.53	0.01	1.57	1.59
-0.15	0.23	0.36	0.13	0.47	0.47	0.00	1.72	1.98
-0.21	0.20	0.17	-0.03	0.27	0.33	0.06	1.97	2.41
-0.20	0.71	0.45	-0.26	0.63	0.37	-0.26	1.36	1.81
0.22	0.29	0.50	0.21	0.23	0.35	0.12	2.26	3.26
-0.06	0.18	0.18	0.00	0.46	0.31	-0.16	1.62	1.81
0.00	0.82	0.83	0.00	0.38	0.48	0.09	1.49	1.38
0.02	0.52	0.53	0.01	0.46	0.50	0.04	1.43	1.45
-0.11	0.15	0.13	-0.02	0.43	0.24	-0.18	1.50	1.96
-0.45	0.13	0.17	0.04	0.17	0.32	0.15	1.61	1.92
0.00	0.21	0.72	0.50	0.16	0.20	0.04	1.63	2.85
-0.02	0.42	0.43	0.01	0.28	0.25	-0.03	1.84	1.84
-0.05	0.69	0.42	-0.27	0.43	0.37	-0.06	1.55	1.90
-0.11	0.52	0.43	-0.09	0.42	0.30	-0.12	1.65	1.84
0.02	0.59	0.67	0.08	0.37	0.24	-0.12	2.29	3.44
-0.10	0.37	0.27	-0.11	0.41	0.28	-0.14	2.00	2.68
0.04	0.49	0.42	-0.07	0.33	0.34	0.01	1.66	1.67
-0.04	0.25	0.26	0.01	0.32	0.33	0.01	2.19	2.09
-0.11	0.68	0.50	-0.18	0.36	0.33	-0.03	1.86	2.01
-0.05	0.32	0.36	0.04	0.36	0.29	-0.07	1.68	1.81
-0.04	0.82	0.74	-0.07	0.46	0.33	-0.13	1.45	1.64
0.14	0.39	0.69	0.30	0.25	0.37	0.11	2.42	1.93
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-0.07	0.12	0.10	-0.02	0.15	0.13	-0.02	1.36	1.38
-0.04	0.82	0.83	0.00	0.63	0.56	-0.06	2.42	3.44
-0.04	0.43	0.44	0.01	0.36	0.34	-0.02	1.81	1.98
0.00	0.21	0.20	-0.01	0.11	0.10	-0.01	0.29	0.50

calculated measure of compactness for the current plan. The "A_" indicates the calculated measure of compact

PERIMETER-BASED MEASURES OF COMPACTNESS

D_Schwartzberg	C_Perimeter	A_Perimeter	D_Perimeter	C_Length-Width	A_Length-Width	D_Length-Width
0.18	441.19	443.07	1.88	0.98	6.38	5.40
-0.01	310.92	299.34	-11.58	11.25	12.19	0.94
-0.55	36.97	27.08	-9.89	0.44	1.25	0.82
-0.17	47.45	47.02	-0.43	0.94	1.47	0.53
-0.52	46.84	45.58	-1.27	0.56	1.45	0.89
-0.20	29.15	27.78	-1.36	1.01	1.22	0.21
0.00	126.93	127.19	0.26	28.19	28.83	0.64
0.41	176.57	239.26	62.69	41.37	44.22	2.85
-0.11	178.89	268.36	89.47	6.73	11.18	4.45
-0.06	343.88	307.24	-36.64	44.01	29.70	-14.32
-0.01	236.17	256.18	20.01	14.49	5.77	-8.72
0.03	532.62	552.20	19.59	13.21	4.16	-9.05
0.26	233.38	260.50	27.12	17.66	2.07	-15.59
0.44	365.85	508.08	142.23	29.03	35.78	6.75
0.45	132.06	209.69	77.63	10.62	17.65	7.03
1.01	273.83	198.32	-75.51	13.04	4.94	-8.10
0.18	404.98	445.57	40.59	47.70	42.19	-5.51
-0.11	143.60	135.58	-8.02	3.51	3.83	0.32
0.02	102.83	102.73	-0.10	3.02	7.32	4.30
0.46	277.19	315.07	37.88	24.01	9.27	-14.74
0.31	152.88	282.06	129.17	51.88	41.86	-10.03
1.22	173.18	89.08	-84.09	50.96	3.19	-47.77
0.00	393.12	406.53	13.41	48.36	42.46	-5.90
0.36	285.36	387.84	102.48	13.03	37.13	24.10
0.19	616.35	711.04	94.69	16.63	14.37	-2.26
1.15	67.06	117.28	50.22	0.25	3.80	3.55
0.68	259.89	431.98	172.09	12.69	24.44	11.75
0.01	97.04	93.88	-3.17	5.87	6.06	0.19
-0.11	531.61	489.12	-42.50	28.74	11.68	-17.06
0.15	213.57	216.19	2.62	10.09	22.55	12.45
0.13	406.37	389.84	-16.54	41.51	49.51	8.00
0.19	261.34	292.25	30.91	20.11	20.21	0.10
-0.49	144.65	120.43	-24.22	11.53	3.43	-8.10
N/A	8,043.75	8,843.36	799.62	N/A	N/A	N/A
0.02	N/A	N/A	N/A	0.25	1.22	0.97
1.03	N/A	N/A	N/A	51.88	49.51	-2.38
0.17	N/A	N/A	N/A	18.89	16.71	-2.18
0.20	N/A	N/A	N/A	16.76	15.50	-1.26

ness for plan as proposed by Act 43. The "D_" indicates the difference.

AREA-BASED MEASURES OF

DIST	C_Reock	A_Reock	D_Reock	C_Polsby-Popper	A_Polsby-Popper	D_Polsby-Popper	C_Population Polygon	A_Population Polygon
1	0.47	0.49	0.01	0.32	0.31	-0.01	0.86	0.87
2	0.56	0.54	-0.02	0.37	0.43	0.06	0.89	0.87
3	0.31	0.33	0.02	0.37	0.17	-0.20	0.87	0.76
4	0.26	0.30	0.04	0.12	0.13	0.01	0.83	0.85
5	0.39	0.53	0.14	0.25	0.24	-0.01	0.62	0.65
6	0.45	0.38	-0.07	0.23	0.16	-0.07	0.72	0.62
7	0.49	0.53	0.04	0.19	0.16	-0.03	0.79	0.65
8	0.40	0.42	0.03	0.13	0.11	-0.02	0.84	0.82
Sum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.26	0.30	0.04	0.12	0.11	-0.01	0.62	0.62
Max	0.56	0.54	-0.02	0.37	0.43	0.06	0.89	0.87
Mean	0.42	0.44	0.02	0.25	0.21	-0.04	0.80	0.76
Std. Dev.	0.10	0.09	0.00	0.10	0.11	0.01	0.09	0.11

Each measure of compactness is preceded with a "C_", "A_" or a "D_". The "C_" indicates the

COMPACTNESS

D_Population Polygon	C_Population Circle	A_Population Circle	D_Population Circle	C_Ehrenburg	A_Ehrenburg	D_Ehrenburg	C_Schwartzberg	A_Schwartzberg
0.01	0.48	0.47	-0.02	0.45	0.41	-0.04	1.69	1.66
-0.02	0.76	0.70	-0.06	0.45	0.56	0.11	1.58	1.48
-0.11	0.40	0.47	0.07	0.27	0.17	-0.09	1.57	2.35
0.02	0.64	0.68	0.04	0.17	0.23	0.06	2.71	2.62
0.03	0.42	0.42	0.01	0.37	0.39	0.02	1.95	1.95
-0.10	0.40	0.26	-0.15	0.24	0.38	0.14	1.86	2.29
-0.14	0.55	0.55	-0.01	0.41	0.40	-0.02	1.79	2.01
-0.02	0.63	0.70	0.07	0.30	0.39	0.10	2.30	2.47
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-0.01	0.40	0.26	-0.15	0.17	0.17	0.00	1.57	1.48
-0.02	0.76	0.70	-0.06	0.45	0.56	-0.11	2.71	2.62
-0.04	0.53	0.53	-0.01	0.33	0.37	-0.03	1.93	2.10
0.02	0.13	0.16	0.02	0.10	0.12	-0.01	0.39	0.40

calculated measure of compactness for the current plan. The "A_" indicates the calculated measure of compactness for the current plan. The "A_" indicates the calculated measure of compactness for the current plan.

PERIMETER-BASED MEASURE OF COMPACTNESS						
D_Schwartzberg	C_Perimeter	A_Perimeter	D_Perimeter	C_Length-Width	A_Length-Width	D_Length-Width
-0.03	260.59	268.46	7.87	33.05	29.97	-3.08
-0.11	348.25	366.36	18.11	19.50	2.63	-16.86
0.77	684.09	927.65	243.57	32.30	7.48	-24.82
-0.09	109.11	113.31	4.20	9.19	8.95	-0.25
0.00	256.36	321.28	64.92	2.47	2.35	-0.13
0.44	564.59	639.00	74.41	39.66	32.11	-7.55
0.22	1,130.57	1,386.03	255.46	9.86	1.90	-7.96
0.18	981.58	889.11	92.47	16.69	11.39	-5.31
N/A	4,335.14	4,911.21	576.07	N/A	N/A	N/A
-0.09	N/A	N/A	N/A	2.47	1.90	-0.57
-0.09	N/A	N/A	N/A	39.66	32.11	-7.55
0.17	N/A	N/A	N/A	20.34	12.10	-8.24
0.01	N/A	N/A	N/A	13.34	12.19	-1.15

ness for plan as proposed by Act 44. The "D_" indicates the difference.

		2010 GOVERNOR				2008 PRESIDENTIAL				2006 GOVERNOR			
DIST.		DEM		GOP		DEM		GOP		DEM		GOP	
		Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.
1		45.3%	45.1%	-0.3%	53.1%	53.4%	0.3%	56.1%	56.0%	-0.1%	42.5%	42.6%	0.1%
2		38.0%	37.8%	-0.2%	60.7%	60.7%	0.0%	52.1%	52.3%	0.2%	46.4%	46.0%	-0.3%
3		41.4%	42.6%	1.2%	57.2%	56.0%	-1.2%	52.0%	52.6%	0.6%	46.3%	45.7%	-0.6%
4		43.0%	42.7%	-0.3%	55.7%	56.1%	0.4%	53.0%	52.2%	-0.9%	45.6%	46.5%	0.9%
5		43.8%	43.7%	-0.1%	55.0%	55.0%	0.1%	54.1%	53.9%	-0.2%	44.4%	44.5%	0.1%
6		36.7%	38.0%	1.3%	61.9%	60.3%	-1.6%	49.8%	50.9%	1.0%	48.6%	47.6%	-1.0%
7		45.2%	49.2%	4.0%	51.8%	49.6%	-4.2%	52.6%	56.5%	3.9%	45.9%	41.7%	-4.1%
8		77.8%	69.6%	-8.3%	21.1%	29.3%	8.2%	82.4%	75.7%	-6.7%	16.5%	23.0%	6.5%
9		60.4%	67.8%	7.4%	38.5%	31.0%	-7.5%	67.1%	74.3%	7.2%	31.4%	24.4%	-7.0%
10		90.2%	87.8%	-2.4%	9.3%	11.8%	2.5%	91.8%	89.6%	-2.2%	7.4%	9.7%	2.3%
11		89.6%	81.5%	-8.1%	10.0%	18.1%	8.1%	91.8%	84.8%	-7.0%	7.6%	14.4%	6.8%
12		71.0%	73.6%	2.6%	28.5%	25.9%	-2.6%	76.0%	77.9%	1.9%	23.1%	21.2%	-1.9%
13		53.4%	38.2%	-15.3%	45.9%	61.2%	15.3%	58.0%	44.3%	-13.7%	40.4%	54.4%	14.0%
14		37.5%	38.5%	1.0%	61.8%	61.0%	-0.8%	43.9%	44.6%	0.7%	54.9%	54.4%	-0.6%
15		44.8%	38.9%	-5.9%	53.9%	60.1%	6.2%	52.7%	47.1%	-5.6%	45.4%	51.3%	5.9%
16		86.9%	90.3%	3.4%	12.5%	9.2%	-3.4%	87.1%	90.4%	3.3%	12.1%	8.8%	-3.3%
17		88.4%	81.4%	-7.0%	11.3%	18.2%	6.8%	90.2%	83.9%	-6.3%	9.3%	15.3%	6.1%
18		85.3%	86.1%	0.8%	14.2%	13.5%	-0.7%	88.2%	87.9%	-0.2%	11.0%	11.3%	0.3%
19		68.1%	69.5%	1.3%	30.8%	29.4%	-1.4%	71.2%	72.1%	0.9%	26.8%	25.9%	-0.9%
20		51.8%	52.0%	0.2%	47.1%	46.9%	-0.2%	57.8%	57.7%	-0.1%	40.6%	40.6%	0.0%
21		42.2%	41.4%	-0.8%	57.0%	57.9%	0.9%	51.0%	50.4%	-0.6%	47.6%	48.2%	0.6%

Assembly District Political Report

DIST.	2010 GOVERNOR				2008 PRESIDENTIAL				2006 GOVERNOR			
	DEM		GOP		DEM		GOP		DEM		GOP	
	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.
22	60.5%	29.5%	-31.0%	39.1%	70.0%	30.8%	63.9%	37.8%	-26.2%	34.9%	60.9%	26.0%
23	47.0%	41.0%	-6.0%	52.5%	58.5%	6.0%	53.5%	47.0%	-6.5%	45.5%	51.9%	6.4%
24	28.7%	39.4%	10.7%	70.6%	60.0%	-10.6%	36.9%	45.8%	8.8%	61.7%	53.1%	-8.6%
25	39.0%	38.7%	-0.4%	59.8%	60.1%	0.3%	51.9%	51.8%	-0.1%	46.4%	46.4%	0.0%
26	45.6%	35.7%	-10.0%	53.1%	63.3%	10.3%	59.3%	48.9%	-10.4%	39.1%	49.6%	10.5%
27	33.4%	36.8%	3.3%	65.5%	62.2%	-3.3%	47.9%	50.6%	2.6%	50.7%	48.0%	-2.6%
28	38.0%	38.0%	0.0%	60.1%	60.1%	0.0%	47.4%	47.0%	-0.3%	50.6%	51.0%	0.3%
29	40.4%	40.6%	0.2%	57.4%	57.2%	-0.2%	52.2%	52.6%	0.4%	45.8%	45.4%	-0.4%
30	41.0%	40.7%	-0.2%	57.2%	57.6%	0.4%	50.5%	50.7%	0.2%	47.6%	47.5%	-0.1%
31	28.0%	37.9%	9.9%	71.0%	60.7%	-10.3%	39.2%	50.4%	11.2%	59.5%	48.2%	-11.3%
32	33.2%	32.0%	-1.2%	65.3%	66.6%	1.3%	48.0%	46.4%	-1.6%	50.4%	52.1%	1.7%
33	25.3%	33.2%	7.9%	74.2%	65.4%	-8.8%	33.6%	44.6%	11.0%	65.5%	54.2%	-11.4%
34	39.7%	39.1%	-0.6%	58.3%	59.0%	0.6%	51.4%	50.2%	-1.1%	47.0%	48.1%	1.1%
35	40.8%	40.3%	-0.5%	57.3%	57.8%	0.5%	53.4%	52.8%	-0.6%	44.7%	45.3%	0.6%
36	42.2%	41.0%	-1.2%	56.3%	57.7%	1.4%	53.5%	52.8%	-0.7%	45.1%	45.8%	0.7%
37	44.1%	38.1%	-6.0%	54.4%	60.5%	6.2%	55.3%	49.5%	-5.9%	48.3%	49.0%	0.7%
38	30.4%	35.8%	5.5%	68.5%	63.3%	-5.2%	41.3%	45.7%	4.4%	57.3%	53.2%	-4.1%
39	34.7%	32.4%	-2.3%	63.9%	66.4%	2.4%	46.8%	45.3%	-1.5%	51.8%	53.3%	1.5%
40	39.7%	39.5%	-0.3%	58.8%	59.1%	0.3%	51.1%	50.8%	-0.4%	47.5%	47.8%	0.3%
41	35.7%	40.0%	4.3%	62.0%	57.7%	-4.3%	45.8%	51.4%	5.6%	52.6%	47.0%	-5.6%
42	47.2%	41.6%	-5.7%	51.1%	56.6%	5.5%	58.4%	51.8%	-6.6%	40.1%	46.7%	6.6%

Assembly District Political Report

DIST.	2010 GOVERNOR				2008 PRESIDENTIAL				2006 GOVERNOR			
	DEM		GOP		DEM		GOP		DEM		GOP	
	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.
43	49.2%	51.3%	2.1%	49.0%	47.0%	-2.0%	60.5%	61.8%	1.3%	37.7%	36.5%	-1.2%
44	56.4%	55.9%	-0.6%	41.5%	42.1%	0.6%	67.6%	67.0%	-0.6%	30.8%	31.4%	0.6%
45	50.0%	53.0%	3.0%	48.3%	44.9%	-3.4%	62.2%	65.2%	3.0%	36.4%	33.1%	-3.3%
46	57.2%	57.0%	-0.2%	41.8%	41.9%	0.2%	64.7%	64.8%	0.1%	34.1%	34.0%	-0.1%
47	48.3%	66.2%	17.9%	50.4%	32.6%	-17.8%	58.2%	71.6%	13.4%	40.5%	27.1%	-13.4%
48	71.7%	72.0%	0.3%	27.2%	26.9%	-0.3%	75.0%	76.0%	1.0%	23.6%	22.7%	-0.9%
49	45.9%	45.9%	0.0%	52.2%	52.3%	0.0%	61.3%	61.1%	-0.1%	37.2%	37.3%	0.1%
50	42.8%	42.8%	0.0%	55.5%	55.5%	0.0%	55.7%	55.8%	0.1%	42.6%	42.5%	-0.1%
51	51.9%	49.2%	-2.7%	46.5%	49.0%	2.5%	64.4%	62.3%	-2.0%	34.3%	36.3%	2.0%
52	38.8%	37.1%	-1.7%	60.0%	61.9%	1.8%	49.8%	48.0%	-1.8%	48.9%	50.8%	1.9%
53	35.9%	36.9%	0.9%	62.9%	61.8%	-1.1%	43.6%	44.6%	1.1%	55.0%	53.8%	-1.2%
54	50.4%	50.3%	-0.1%	47.9%	47.9%	0.1%	60.3%	60.2%	-0.1%	38.1%	38.2%	0.1%
55	46.6%	41.5%	-5.1%	51.5%	56.8%	5.3%	58.1%	52.3%	-5.8%	39.7%	45.7%	5.9%
56	36.1%	38.6%	2.5%	62.5%	60.2%	-2.3%	46.9%	48.8%	1.9%	51.6%	49.9%	-1.7%
57	50.1%	51.9%	1.8%	48.3%	46.1%	-2.2%	59.5%	62.4%	2.9%	38.5%	35.4%	-3.1%
58	24.9%	25.3%	0.3%	74.3%	73.9%	-0.3%	36.0%	36.5%	0.5%	62.7%	62.3%	-0.5%
59	22.2%	25.7%	3.5%	77.0%	73.3%	-3.7%	32.8%	37.8%	5.0%	65.8%	60.6%	-5.1%
60	29.5%	27.3%	-2.2%	69.8%	72.0%	2.2%	38.0%	36.3%	-1.7%	60.8%	62.5%	1.8%
61	60.7%	36.7%	-24.0%	38.3%	62.0%	23.7%	69.4%	48.1%	-21.2%	29.4%	50.2%	20.8%
62	50.7%	38.7%	-12.1%	48.3%	60.4%	12.1%	60.1%	48.0%	-12.1%	38.5%	50.8%	12.2%
63	32.7%	36.8%	4.1%	66.5%	62.4%	-4.0%	41.8%	45.8%	4.0%	57.0%	53.0%	-4.0%

Assembly District Political Report

2006 GOVERNOR

DIST.	DEM			GOP		
	Current	Proposed	Diff.	Current	Proposed	Diff.
64	64.5%	58.8%	-5.7%	33.5%	39.7%	6.1%
65	56.0%	63.6%	7.6%	42.3%	34.4%	-7.9%
66	44.8%	65.2%	20.4%	53.2%	33.1%	-20.1%
67	51.7%	51.8%	0.1%	46.0%	45.9%	-0.1%
68	57.2%	53.9%	-3.2%	40.4%	43.6%	3.2%
69	50.7%	51.0%	0.3%	46.5%	46.2%	-0.3%
70	54.9%	52.2%	-2.7%	42.3%	44.8%	2.5%
71	61.2%	62.4%	1.2%	35.7%	34.5%	-1.2%
72	55.7%	53.5%	-2.3%	41.7%	44.0%	2.3%
73	62.8%	62.1%	-0.7%	35.1%	35.9%	0.8%
74	60.3%	60.9%	0.6%	37.5%	37.0%	-0.5%
75	50.3%	50.1%	-0.3%	48.0%	48.2%	0.2%
76	75.3%	83.3%	8.0%	21.9%	12.2%	-9.7%
77	77.0%	80.1%	3.1%	20.4%	16.8%	-3.6%
78	83.3%	70.4%	-12.9%	12.2%	27.6%	15.4%
79	64.9%	61.3%	-3.7%	33.0%	36.8%	3.8%
80	61.3%	64.0%	2.7%	36.3%	33.8%	-2.6%
81	64.9%	57.9%	-7.1%	32.4%	39.7%	7.3%
82	43.0%	44.6%	1.6%	55.7%	54.1%	-1.7%
83	33.7%	35.1%	1.4%	64.8%	63.5%	-1.3%
84	38.0%	44.0%	6.0%	60.7%	54.5%	-6.1%

2008 PRESIDENTIAL

DIST.	DEM			GOP		
	Current	Proposed	Diff.	Current	Proposed	Diff.
64	67.7%	61.4%	-6.3%	30.5%	37.0%	6.5%
65	58.0%	67.0%	9.0%	40.4%	31.2%	-9.2%
66	47.3%	73.0%	25.8%	51.3%	25.6%	-25.6%
67	52.7%	52.7%	0.0%	45.5%	45.5%	0.0%
68	59.5%	55.7%	-3.8%	38.9%	42.7%	3.8%
69	52.2%	52.8%	0.5%	45.6%	45.2%	-0.4%
70	56.7%	55.1%	-1.6%	41.4%	43.1%	1.7%
71	63.1%	63.8%	0.7%	34.8%	34.1%	-0.7%
72	56.9%	54.6%	-2.3%	41.0%	43.4%	2.4%
73	63.0%	62.6%	-0.4%	35.4%	35.8%	0.4%
74	60.7%	61.3%	0.6%	37.9%	37.1%	-0.8%
75	52.7%	52.2%	-0.5%	45.9%	46.3%	0.4%
76	78.5%	84.3%	5.9%	20.2%	13.5%	-6.6%
77	78.5%	82.7%	4.2%	20.1%	15.8%	-4.3%
78	85.6%	73.6%	-12.0%	12.3%	25.3%	13.0%
79	67.8%	63.8%	-4.0%	31.1%	35.2%	4.1%
80	64.1%	67.1%	2.9%	34.3%	31.7%	-2.6%
81	68.6%	61.9%	-6.7%	30.2%	36.7%	6.6%
82	43.9%	45.5%	1.6%	54.9%	53.3%	-1.6%
83	34.9%	35.4%	0.5%	64.0%	63.5%	-0.5%
84	38.9%	44.1%	5.2%	60.0%	54.6%	-5.4%

2010 GOVERNOR

DIST.	DEM			GOP		
	Current	Proposed	Diff.	Current	Proposed	Diff.
64	58.8%	51.6%	-7.2%	40.1%	47.4%	7.4%
65	48.2%	58.4%	10.3%	50.9%	40.4%	-10.5%
66	35.9%	65.0%	29.1%	62.9%	34.2%	-28.8%
67	40.4%	40.4%	0.0%	57.3%	57.3%	0.0%
68	48.7%	43.6%	-5.1%	49.3%	54.2%	4.9%
69	36.5%	37.6%	1.1%	60.9%	60.0%	-0.9%
70	43.4%	41.8%	-1.6%	54.5%	55.7%	1.2%
71	52.8%	53.5%	0.7%	45.7%	45.0%	-0.7%
72	44.8%	43.0%	-1.8%	53.1%	55.0%	1.9%
73	54.7%	54.3%	-0.4%	43.7%	44.1%	0.4%
74	52.8%	53.1%	0.3%	45.9%	45.3%	-0.6%
75	43.9%	43.0%	-0.9%	54.4%	55.2%	0.8%
76	75.6%	83.9%	8.2%	23.4%	14.8%	-8.6%
77	75.8%	81.2%	5.4%	23.3%	18.0%	-5.3%
78	84.9%	69.3%	-15.6%	13.9%	29.9%	16.0%
79	61.5%	57.5%	-4.1%	37.5%	41.7%	4.1%
80	54.2%	59.1%	4.9%	44.2%	39.7%	-4.5%
81	62.3%	52.0%	-10.3%	36.6%	46.6%	10.0%
82	37.1%	38.3%	1.2%	62.3%	61.1%	-1.3%
83	26.0%	27.2%	1.2%	73.4%	72.2%	-1.2%
84	31.1%	37.2%	6.1%	68.3%	62.0%	-6.3%

2006 GOVERNOR

DIST.	DEM		GOP		Diff.
	Current	Proposed	Current	Proposed	
85	56.0%	56.3%	41.8%	41.5%	-0.2%
86	50.7%	50.4%	47.2%	47.4%	0.2%
87	51.6%	50.2%	46.0%	47.3%	1.3%
88	54.8%	47.9%	43.1%	50.6%	7.4%
89	46.9%	46.9%	51.7%	51.7%	0.0%
90	50.9%	58.4%	47.2%	39.1%	-8.1%
91	57.3%	60.5%	40.8%	37.0%	-3.9%
92	51.3%	57.9%	46.0%	40.1%	-5.9%
93	56.4%	53.0%	41.3%	45.2%	3.8%
94	51.6%	51.4%	46.2%	46.4%	0.2%
95	63.0%	62.8%	34.0%	34.2%	0.2%
96	57.5%	56.4%	40.2%	41.2%	1.0%
97	42.5%	39.9%	55.7%	58.5%	2.8%
98	32.3%	35.8%	66.6%	62.7%	-4.0%
99	31.2%	30.3%	67.3%	68.4%	1.1%

2008 PRESIDENTIAL

DIST.	DEM		GOP		Diff.
	Current	Proposed	Current	Proposed	
85	56.7%	57.4%	41.4%	40.8%	-0.6%
86	51.4%	51.1%	46.9%	47.1%	0.2%
87	52.2%	51.6%	45.6%	46.4%	0.9%
88	61.6%	53.7%	37.0%	45.2%	8.1%
89	52.2%	52.1%	46.4%	46.6%	0.2%
90	56.4%	65.7%	42.2%	32.7%	-9.5%
91	58.3%	64.1%	40.1%	34.2%	-5.9%
92	55.1%	60.9%	43.4%	37.6%	-5.8%
93	59.4%	52.0%	38.9%	46.2%	7.3%
94	55.2%	54.7%	43.4%	43.9%	0.5%
95	66.9%	66.8%	31.3%	31.4%	0.2%
96	60.6%	59.8%	37.6%	38.5%	0.9%
97	46.1%	43.4%	52.6%	55.5%	2.9%
98	34.7%	38.3%	64.5%	60.7%	-3.8%
99	33.0%	31.7%	65.9%	67.4%	1.5%

2010 GOVERNOR

DIST.	DEM		GOP		Diff.
	Current	Proposed	Current	Proposed	
85	44.8%	45.3%	53.3%	52.8%	-0.5%
86	38.7%	38.4%	59.5%	59.9%	0.4%
87	39.7%	38.3%	57.4%	59.1%	1.8%
88	50.8%	43.1%	47.3%	55.5%	8.2%
89	39.8%	40.0%	58.9%	58.7%	-0.2%
90	45.3%	54.3%	53.2%	43.6%	-9.6%
91	46.6%	54.4%	51.5%	43.9%	-7.6%
92	42.1%	48.1%	55.5%	49.9%	-5.6%
93	48.6%	42.1%	49.7%	56.0%	6.3%
94	42.8%	42.5%	55.8%	56.1%	0.3%
95	56.6%	56.1%	41.5%	42.0%	0.5%
96	48.6%	47.6%	49.6%	50.5%	1.0%
97	34.8%	32.6%	64.4%	66.8%	2.3%
98	26.8%	28.5%	72.7%	70.9%	-1.8%
99	23.4%	23.2%	76.0%	76.3%	0.2%

		2006 GOVERNOR			
		DEM		GOP	
	Current	48.2%	50.1%	50.8%	Diff. 0.7%
	Proposed	65.9%	31.4%	30.3%	Diff. -1.1%
	Diff.	55.1%	42.7%	41.0%	Diff. -1.7%
	Current	68.5%	29.7%	30.4%	Diff. 0.8%
	Proposed	39.4%	59.1%	59.0%	Diff. -0.1%
	Diff.	46.2%	51.9%	52.4%	Diff. 0.5%
	Current	55.0%	42.6%	45.4%	Diff. 2.7%
	Proposed	48.4%	49.8%	49.9%	Diff. 0.1%

		2008 PRESIDENTIAL			
		DEM		GOP	
	Current	51.3%	47.3%	48.0%	Diff. 0.6%
	Proposed	68.9%	29.7%	28.6%	Diff. -1.2%
	Diff.	57.6%	40.7%	39.1%	Diff. -1.7%
	Current	75.2%	23.6%	24.6%	Diff. 1.0%
	Proposed	41.2%	57.6%	57.1%	Diff. -0.6%
	Diff.	49.8%	48.6%	49.2%	Diff. 0.6%
	Current	55.8%	42.4%	45.2%	Diff. 2.8%
	Proposed	53.5%	45.0%	45.0%	Diff. -0.1%

		2010 GOVERNOR			
		DEM		GOP	
	Current	40.6%	58.4%	59.2%	Diff. 0.8%
	Proposed	62.4%	36.3%	35.2%	Diff. -1.1%
	Diff.	45.7%	52.4%	50.6%	Diff. -1.8%
	Current	70.7%	28.5%	29.5%	Diff. 1.0%
	Proposed	33.1%	66.3%	67.0%	Diff. 0.7%
	Diff.	37.9%	60.6%	60.6%	Diff. 0.0%
	Current	44.6%	53.5%	56.2%	Diff. 2.7%
	Proposed	42.3%	56.3%	56.2%	Diff. 0.0%

DIST.	2010 GOVERNOR				2008 PRESIDENTIAL				2006 GOVERNOR			
	DEM		GOP		DEM		GOP		DEM		GOP	
	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.
1	41.7%	42.0%	0.3%	56.9%	56.5%	-0.4%	53.4%	53.7%	0.4%	45.1%	44.7%	-0.4%
2	41.3%	41.6%	0.2%	57.3%	57.1%	-0.3%	52.4%	52.3%	-0.1%	46.1%	46.2%	0.1%
3	54.9%	58.0%	3.1%	44.0%	40.8%	-3.2%	62.9%	65.8%	2.9%	35.7%	32.7%	-3.0%
4	83.2%	81.3%	-1.9%	16.3%	18.3%	1.9%	86.4%	84.3%	-2.0%	12.8%	14.8%	2.0%
5	45.1%	38.5%	-6.5%	54.1%	60.8%	6.7%	51.4%	45.3%	-6.1%	47.1%	53.5%	6.3%
6	87.0%	85.4%	-1.6%	12.5%	14.1%	1.6%	88.6%	87.3%	-1.3%	10.7%	12.0%	1.2%
7	54.3%	54.9%	0.6%	44.7%	44.1%	-0.6%	60.5%	60.9%	0.4%	37.8%	37.4%	-0.4%
8	45.2%	36.8%	-8.5%	54.2%	62.7%	8.5%	51.4%	43.6%	-7.8%	47.4%	55.2%	7.8%
9	38.7%	37.0%	-1.8%	60.1%	61.9%	1.8%	52.6%	50.4%	-2.2%	45.9%	48.0%	2.2%
10	39.8%	39.7%	-0.1%	58.2%	58.3%	0.1%	50.1%	50.1%	0.0%	47.9%	47.9%	0.0%
11	28.2%	34.4%	6.1%	70.8%	64.2%	-6.6%	39.6%	47.1%	7.5%	59.1%	51.5%	-7.6%
12	40.8%	40.1%	-0.8%	57.4%	58.2%	0.8%	52.7%	51.9%	-0.8%	45.7%	46.5%	0.8%
13	36.4%	35.5%	-0.8%	62.3%	63.3%	1.1%	47.8%	46.8%	-1.0%	50.8%	51.9%	1.0%
14	40.9%	40.4%	-0.5%	57.3%	57.8%	0.5%	51.8%	51.3%	-0.5%	46.7%	47.2%	0.5%
15	51.7%	53.3%	1.6%	46.5%	44.8%	-1.7%	63.2%	64.6%	1.3%	35.2%	33.8%	-1.4%
16	59.6%	65.3%	5.7%	39.3%	33.6%	-5.7%	66.2%	70.9%	4.7%	32.5%	27.8%	-4.6%
17	47.0%	46.1%	-1.0%	51.3%	52.2%	0.9%	60.5%	59.8%	-0.7%	38.0%	38.6%	0.7%
18	41.5%	41.4%	-0.1%	57.2%	57.3%	0.1%	51.3%	51.2%	0.0%	47.3%	47.3%	0.0%
19	43.3%	43.6%	0.3%	55.1%	54.8%	-0.3%	54.0%	54.3%	0.3%	44.1%	43.8%	-0.3%
20	25.6%	26.1%	0.5%	73.6%	73.0%	-0.6%	35.7%	36.9%	1.2%	63.1%	61.8%	-1.2%
21	45.4%	37.5%	-7.9%	53.7%	61.5%	7.8%	58.3%	47.3%	-8.0%	43.4%	51.3%	7.9%

Senate District Political Report

DIST.	2010 GOVERNOR						2008 PRESIDENTIAL						2006 GOVERNOR					
	DEM			GOP			DEM			GOP			DEM			GOP		
	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.	Current	Proposed	Diff.
22	46.3%	57.9%	11.6%	52.6%	41.0%	-11.6%	57.1%	66.5%	9.8%	41.3%	31.5%	-9.8%	54.3%	62.4%	8.1%	43.8%	35.8%	-7.9%
23	42.3%	40.5%	-1.7%	55.5%	57.2%	1.7%	55.1%	53.7%	-1.4%	43.1%	44.5%	1.4%	53.3%	52.2%	-1.1%	44.2%	45.2%	1.1%
24	47.1%	46.3%	-0.8%	51.0%	51.8%	0.7%	59.1%	58.0%	-1.0%	38.9%	40.0%	1.1%	57.3%	56.2%	-1.2%	39.8%	41.0%	1.1%
25	50.6%	50.4%	-0.2%	47.9%	48.0%	0.1%	58.9%	58.9%	0.0%	39.6%	39.5%	0.0%	57.9%	57.9%	0.0%	40.1%	40.1%	0.0%
26	78.7%	78.4%	-0.3%	20.3%	20.6%	0.3%	80.8%	80.5%	-0.3%	17.6%	17.9%	0.3%	78.4%	78.4%	0.0%	18.3%	18.3%	0.1%
27	59.8%	56.5%	-3.3%	39.1%	42.4%	3.3%	67.0%	64.3%	-2.6%	31.8%	34.5%	2.7%	63.9%	61.2%	-2.7%	33.8%	36.6%	2.8%
28	31.3%	34.0%	2.8%	68.1%	65.3%	-2.8%	39.2%	41.6%	2.4%	59.7%	57.2%	-2.5%	38.2%	41.1%	2.9%	60.4%	57.5%	-3.0%
29	41.0%	40.6%	-0.4%	56.9%	57.4%	0.5%	53.4%	53.3%	-0.1%	44.7%	44.9%	0.1%	52.7%	52.3%	-0.4%	45.1%	45.5%	0.4%
30	44.9%	44.8%	-0.1%	53.5%	53.6%	0.1%	56.5%	56.5%	0.0%	42.1%	42.2%	0.1%	50.6%	50.4%	-0.2%	47.7%	47.9%	0.2%
31	46.0%	48.2%	2.2%	52.0%	49.9%	-2.1%	57.8%	59.0%	1.2%	40.6%	39.3%	-1.3%	55.2%	57.1%	1.9%	42.6%	40.8%	-1.8%
32	48.8%	48.6%	-0.2%	49.5%	49.7%	0.2%	60.7%	60.6%	-0.2%	37.6%	37.8%	0.2%	57.2%	57.0%	-0.2%	40.3%	40.4%	0.2%
33	27.6%	27.8%	0.1%	71.8%	71.7%	-0.1%	37.3%	37.5%	0.2%	61.6%	61.5%	-0.1%	34.6%	35.0%	0.4%	64.0%	63.5%	-0.5%