



BELL GIFTOS  
ST. JOHN LLC

January 14, 2022

**VIA E-FILING BY EMAIL**

Hon. Sheila Reiff  
Clerk of the Supreme Court and Court of Appeals  
110 East Main Street, Suite 215  
P.O. Box 1688  
Madison, WI 53701-1688

**Re: *Johnson v. Wisconsin Elections Commission*, No. 2021AP1450-OA; Filing of Uniform Maps created by 2021 Senate Bill 621, 2021 Senate Bill 622, 2011 Wisconsin Act 43 (as amended by *Baldus*), and 2011 Wisconsin Act 44.**

Dear Ms. Reiff,

Pursuant to the Court's January 10, 2022 Order, the Legislature submits uniform maps reflecting:

- 2021 Wisconsin Senate Bill 621 (depicting the Legislature's proposed plans for Assembly and Senate);
- 2021 Wisconsin Senate Bill 622 (depicting the Legislature's and Congressional intervenors' proposed plans for Congressional districts);
- 2011 Wisconsin Act 43, as modified by *Baldus* (depicting existing Assembly and Senate districts); and
- 2011 Wisconsin Act 44 (depicting existing Congressional districts).

As described below, versions of these maps (and all maps submitted in this case) have been uploaded to interactive websites that allow the Court to compare plans to one another and to current law.

To produce the uniform maps, the parties agreed to use the services of the Wisconsin Legislative Technology Services Bureau (“LTSB”), a nonpartisan legislative service agency vested with the responsibility of maintaining a statewide database of municipal boundary information and serving as the State’s liaison with the United States Census Bureau. Wis. Stat. § 13.96.

For each set of districts, LTSB produced statewide maps, Milwaukee area maps, Madison area maps, Green Bay/Fox Cities area maps, and Eau Claire/Chippewa Falls area maps. For each category, LTSB produced two versions. One contains the district lines, numbers, and municipal boundary information contained in the U.S. Census TIGER 2020 municipal boundaries (updated from the prior decennial). The second contains only the district lines and numbers to facilitate their use as transparencies.

The maps have been collated for email filing so that there is one “All Maps” PDF for each plan:

- (1) Legislative Plan 621 Assembly Districts – All Maps;
- (2) Legislative Plan 621 – Senate Districts – All Maps;
- (3) Congressional Plan SB 622 – Congressional Districts – All Maps;
- (4) 2011 Act 43 w Baldus v. Brennan – Assembly Districts – All Maps;
- (5) 2011 Act 43 w Baldus v. Brennan – Senate Districts – All Maps; and
- (6) 2011 Act 44 – Congressional Districts – All Maps.

The original and 17 paper copies of each “All Maps” PDFs are scheduled to be filed with the Court by 9:00 a.m. on Tuesday, January 18, 2022. The original and 17 transparencies of each individual map (unbound, unstapled), are also scheduled to be filed, along with their originals, with the Court by 9:00 a.m. on Tuesday, January 18, 2022.

In addition, in the email submission only, we are providing a second PDF of each statewide plan that enables the user to enlarge areas while losing less resolution than the paper sized PDFs.

As noted above, while preparing the PDF's for the Legislature and all other parties, LTSB loaded the maps onto three interactive web sites:

- All Assembly plans:

<https://www.arcgis.com/apps/webappviewer/index.html?id=c6d051b36a874479bd3b8b1306161323>

- All Senate plans:

<https://www.arcgis.com/apps/webappviewer/index.html?id=801e8b33c4a945e0b1ce6d9362e1a7db>

- All Congressional plans:

<https://www.arcgis.com/apps/webappviewer/index.html?id=0acd1247b31a406bab92215f0d2f43e4>.

At these websites, any user may turn on and off different proposals and existing law (and the 2020 TIGER municipal layer) to compare districts. Finally, while the maps submitted by all parties today will show differences in *area* of each district, they will not necessarily show differences in *population* or *people moved*. A small change by area could be a large change by population in a densely populated area, and *vice versa*. The Legislature's expert and others have quantified populations moved between districts. See, e.g., Bryan 12/15 Rep. App. 2B and 2C; Bryan 12/30 Response Rep. App. 1J-1O.

Respectfully submitted,

Electronically Signed By  
Kevin M. St. John<sup>1</sup>

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cc: All parties, by email, per agreement of the parties

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<sup>1</sup> I certify that the body of this letter brief uses proportional serif font and contains 529 words as calculated by Microsoft Word.