

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Louis Agre, William Ewing,
Floyd Montgomery, Joy Montgomery,
and Rayman Solomon,

Plaintiffs,

v.

Thomas W. Wolf, Governor of Pennsylvania
Pedro Cortes, Secretary of State of
Pennsylvania, and Jonathan Marks,
Commissioner of the Bureau of Elections,
in their official capacities,

Defendants.

Civil Action No. 17-4392

PLAINTIFFS' PROPOSED FINDINGS OF FACT

1. The documents attached at App. 0016-0041(Plaintiffs' Documents Nos. 695-720) are true and accurate copies of reimbursement requests submitted to the House of Representatives Office of the Comptroller by the individuals named on each page for the expenses incurred by that individual.

2. Plaintiffs' Documents No. 586-613, attached hereto at App. 0043-0069, are true and correct copies of materials downloaded from public websites, as testified to in the Declarations contained therein.

3. Plaintiffs' Document No. 150, attached hereto at App. 0070, is a true and correct copy of a letter from Chris Jankowski to "Dear Legislative Leaders".

4. Plaintiffs' Documents Nos. 166-537, (not included in the Appendix), are true and correct copies of sworn testimony given by Thomas Hofeller on Thursday, June 28, 2012 and Friday, August 10, 2012, in the case of *County of Wake and Margaret Dickson v. Rucho et al.*

5. Packing concentrates members of a group in a single district, thereby allowing the other party to win the remainder of the districts because the members of the packed group have less influence in the rest of the districts.

6. Cracking splits a block of party voters among multiple districts, so as to dilute their impact and to prevent them from forming a majority.

7. There are four Democratic districts where Democrats won by a larger margin than any Republican winner in any other district of the state - by an average of over 75 percent in these four districts.

8. Partisan considerations played some role in the drafting of the map, etc. (Jason's proposal).

9. The persons who drafted the map that was approved in SB 1249 had the specific purpose of achieving the election of the most Republicans and fewest Democrats possible given the party or political preferences of voters in the state.

10. The persons who drafted the map that was approved in SB 1249 did in fact adjust the boundaries in the manner described by the report of Daniel McGlone, the Senior Analyst of Azavea, attached as Exhibit A.

11. Those who drew up the Map deliberately sought to influence Pennsylvania's electoral outcomes.

12. Those who drew up the Map deliberately sought to favor a class of candidates for Pennsylvania's Congressional delegation—namely, Republicans—and disfavor another class—namely, Democrats.

13. Those who drew up the Map deliberately sought to influence the districts in which Plaintiffs and others could vote based upon their party affiliation or likely political views.

14. Those who drew up the Map sought to protect one class of candidates – namely incumbents – over another class of candidates – namely challengers for Congressional seats in Congress.

15. Defendants Turzai and Scarnati participated in the drawing of the map that was adopted by the Pennsylvania legislature as the Congressional districting plan for 2012 (“the Map”).

16. The legislators who presented the Map to the legislature for consideration did not inform the legislators that they deliberately sought to influence Pennsylvania's electoral outcomes.

17. The legislators who presented the Map to the legislature for consideration did not inform the legislators that they deliberately sought to favor a class of candidates for Pennsylvania's Congressional delegation—namely, Republicans—and disfavor another class—namely, Democrats.

18. The legislators who presented the Map to the legislature for consideration did not inform the legislators that they deliberately sought to influence the districts in which Plaintiffs and others could vote based upon their party affiliation or likely political views.

19. The legislators who presented the Map to the legislature for consideration did not inform the legislators that they deliberately sought to protect one class of candidates – namely

incumbents – over another class of candidates – namely challengers for Congressional seats in Congress.

20. The RLCC is dedicated exclusively to supporting the election of more Republicans to state legislatures.

21. At the same time, the votes for the Democratic and Republican candidates for Congress on a statewide basis were divided nearly equally, with Republicans winning just 55.5% of the statewide congressional vote in 2014, and 53.9% in 2016.

22. REDMAP states on its website:

REDMAP's effect on the 2012 election is plain when analyzing the results: Pennsylvanians cast 83,000 more votes for Democratic U.S. House candidates than their Republican opponents, but elected a 13-5 Republican majority to represent them in Washington.

23. Chris Jankowski's letter to the Republican leadership in the states that REDMAP had identified is shown at <https://www.documentcloud.org/documents/537408-hofeller-sglf-rslc-letter>. A copy of the letter is reproduced at App. 0070.

24. At least one other Republican Legislative Leader in Pennsylvania received a copy of the letter shown at App. 0070.

25. Speaker Turazi, someone on his staff, another Republican Legislative Leader, or member of his or her staff, contacted Tom Hofeller.

26. The Republican Legislative Leadership received advice or other assistance from Tom Hofeller during the redistricting process.

27. On or about March 30, 2011, Speaker Turzai, David L. Reddecliff, and William Schaller attended meeting(s) with Congressmen in Washington, D.C. to discuss redistricting. (Plaintiffs' Document Nos. 715-720, attached hereto at App. 0036-0041).

28. All of the Congressmen at the March 30, 2011 meeting(s) were members of Pennsylvania's Republican delegation.

29. At none of the three hearings held at locations across the state was a map presented for consideration.

30. No map was introduced for consideration on September 14, 2011.

31. The RSLC is a national organization whose mission includes support for the election of Republicans to multiple down-ballot, state-level offices.

32. In late 2011, in connection with the drawing of new Congressional district boundaries after the 2010 census, Speak Scarnati participated in a meeting at the Harrisburg Hilton ("the 2011 Meeting").

33. The 2011 Meeting took place before the Congressional districts were finalized.

34. The majority of the members of the Republican Congressional delegation attended the 2011 Meeting.

35. Congressman Bill Shuster attended the 2011 meeting.

36. Present at the 2011 Meeting were Speaker Scarnati and Bill Shuster.

37. Also present at the 2011 Meeting was at least one person paid by SGLF or working for corporations or entities that received funds from either SGLF or RSLC or both.

38. Also present at the meeting were consultants to help the Republican leadership draw proposed Congressional maps.

39. No Democrats were invited to the 2011 Meeting.

40. No Democrats participated in the 2011 Meeting.

41. One or more possible Congressional districting plans discussed or considered in the 2011 meeting had been generated or developed by persons paid by SGLF.

42. All of the Congressional districting plans discussed or considered in the 2011 meeting had been generated or developed by persons paid by SGLF.

43. REDMAP data were referred to at the meeting.

44. REDMAP data were used in drawing the district lines.

45. At the 2011 Meeting, the participants put two incumbent Democratic congressmen from Western Pennsylvania, Mark Critz and Jason Altmire into the same district to eliminate one of their seats in Congress.

46. At the 2011 Meeting, the participants then took away portions of this same district that were likely to favor the election of either Critz or Altmire, to hinder either one from being elected from the district.

47. At the 2011 Meeting, the participants discussed and approved of plans developed with the help of persons paid by SGLF and that attempted to pack the Democratic voters into as few Congressional districts as possible.

48. The participants in the 2011 Meeting also received legal advice from attorneys paid by SGLF.

49. The participants in the 2011 Meeting also discussed removing Scranton from the 11th District to increase the likelihood that Republican incumbent Louis Barletta of the 11th District could retain his seat.

50. The participants at the 2011 meeting also discussed linking together Wilkes-Barre and Scranton into one heavily Democratic majority district, the PA 17th District.

51. In creating the PA 17th, the participants at the 2011 Meeting discussed absorbing or locating as many likely Democratic voters as possible into the 17th district from the

surrounding areas in order to make it more likely that voters in the districts surrounding the 17th district would elect Republicans.

52. At the 2011 Meeting, the participants heard from one or more Republican Congressmen or one or more of the members of their staffs as to their preferences for the boundaries of their districts in the redistricting plan.

53. At the 2011 Meeting, those present went over the Pennsylvania map district by district.

54. At the 2011 Meeting, those present considered one or more plans developed with election records and lists and computer software by persons paid by SGLF and part of the REDMAP Project to design a plan that they believed would maximize the number of Republican candidates elected to the U.S. House of Representatives from Pennsylvania.

55. A number of such 18 Congressional districts were drawn with the use of techniques known by the terms of "packing" and "cracking."

56. Speaker Scarnati and one or more of the participants in the 2011 Meeting were familiar with the techniques of "packing" and "cracking."

57. Speaker Scarnati favored and were aware of the use of these techniques in the development of the Congressional districting plan adopted in 2011.

58. Speaker Scarnati was aware of and did not disavow the use of these techniques in the development of the Congressional districting plan.

59. The goal of the Republican Leadership in the PA House and Pa Senate ("Republican Leadership") was to create as many reliable Republican seats across Pennsylvania as possible as a result of the 2011 Congressional redistricting.

60. The goal of Republican Leadership was also to ensure that Districts facing a migration of Democrats into majority Republican Districts would not shift to become Democratic seats or competitive seats over the course of the decade from 2011 to 2021.

61. The new 2011 PA Congressional District map for Pennsylvania (the “New Map”) had the intended effect of combining incumbents Democrats Mark Critz and Jason Altmire into a single district so that one or the other would be eliminated in the Democratic Primary.

62. The 2011 Plan removed inner ring suburbs around Pittsburgh from this new combined district, and added white working-class Johnstown with the intent of making the election of a Republican more likely.

63. The Congressional districting map that was ultimately approved for Pennsylvania (“the 2011 Plan”) is substantially similar to the map developed at the 2011 Meeting.

64. At the same time, the votes for the Democratic and Republican candidates for Congress on a statewide basis were divided nearly equally, with Republicans winning just 55.5% of the statewide congressional vote in 2014, and 53.9% in 2016.

65. REDMAP states on its website:

REDMAP’s effect on the 2012 election is plain when analyzing the results: Pennsylvanians cast 83,000 more votes for Democratic U.S. House candidates than their Republican opponents, but elected a 13-5 Republican majority to represent them in Washington.

66. The SGLF 501(c)(4) offered, among other resources, the assistance of experts and lawyers to help legislators in targeted states draw their new Congressional district maps.

67. As of the time that you and others in the Republican leadership were participating in drawing the new Congressional districting map for 2011, Chris Jankowski was the Executive director of the RSLC.

68. Speaker Scarnati received a copy of the letter shown at App. 0070.

69. Someone on Speaker Scarnati's staff received a copy of the letter shown at App. 0070.

70. At least one other Republican Legislative Leader or member of his or her staff requested help from SGLF.

71. Speaker Scarnati, someone on his staff, another Republican Legislative Leader, or member of his or her staff, contacted Tom Hofeller.

72. The Republican Legislative Leadership received advice during the redistricting process from lawyers at Blank Rome.

73. The Republican Legislative Leadership received advice or other assistance from Tom Hofeller during the redistricting process.

74. At the 2011 Meeting, there was a computer.

75. Some or all of the programs on that computer had been supplied by REDMAP.

76. The computer at the 2011 Meeting was programmed to generate district maps.

77. Someone took notes at the 2011 Meeting.

78. The 2011 Meeting was recorded.

/S/

Alice W. Ballard, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing Plaintiffs' Proposed Findings of Fact was served upon parties of record via the Court's ECF system.

November 29, 2017

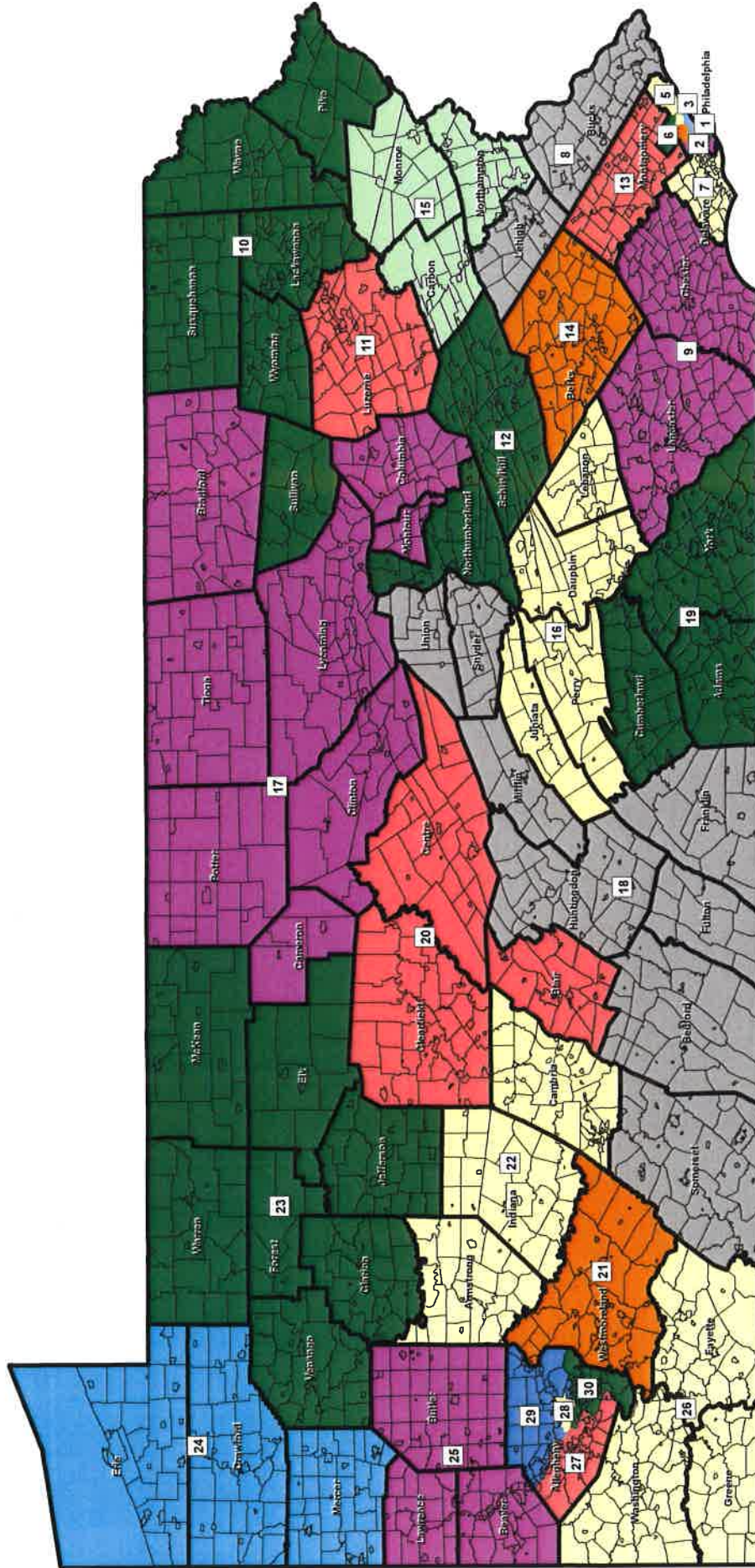
/S/
Alice W. Ballard, Esquire

“Pennsylvania Congressional Districts Act 119 of 1943.” *Congressional Redistricting*, 16 Jan. 2013, <http://www.redistricting.state.pa.us/Maps/index.cfm>

App. 0001

0576

**Pennsylvania Congressional Districts
Act 464 of 1951**



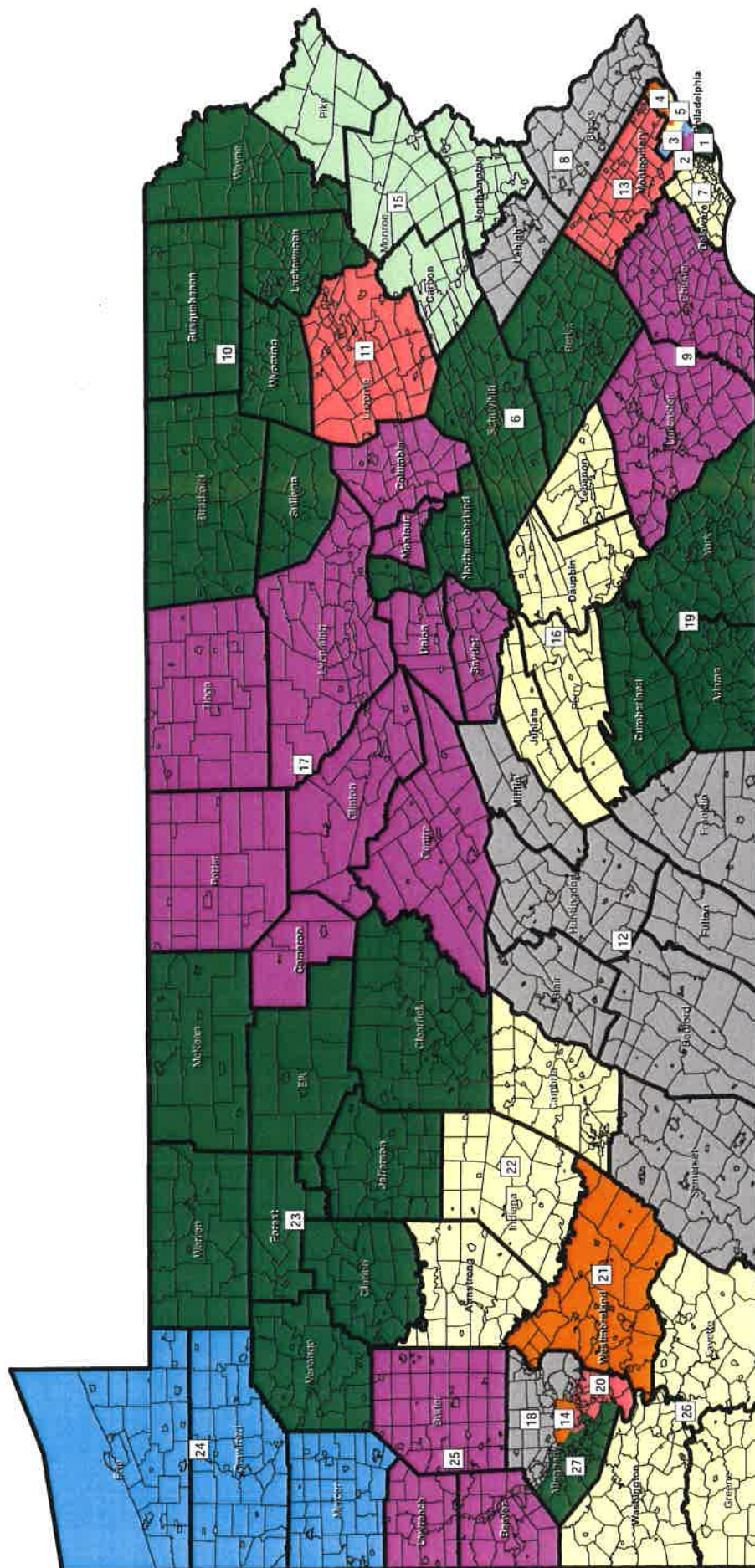
“Pennsylvania Congressional Districts Act 464 of 1951.” *Congressional Redistricting*,
16 Jan. 2013, <http://www.redistricting.state.pa.us/Maps/index.cfm>

App. 0002

0577



Pennsylvania Congressional Districts Act 1 of 1962



“Pennsylvania Congressional Districts Act 1 of 1962.” Congressional Redistricting,
16 Jan. 2013, <http://www.redistricting.state.pa.us/Maps/index.cfm>

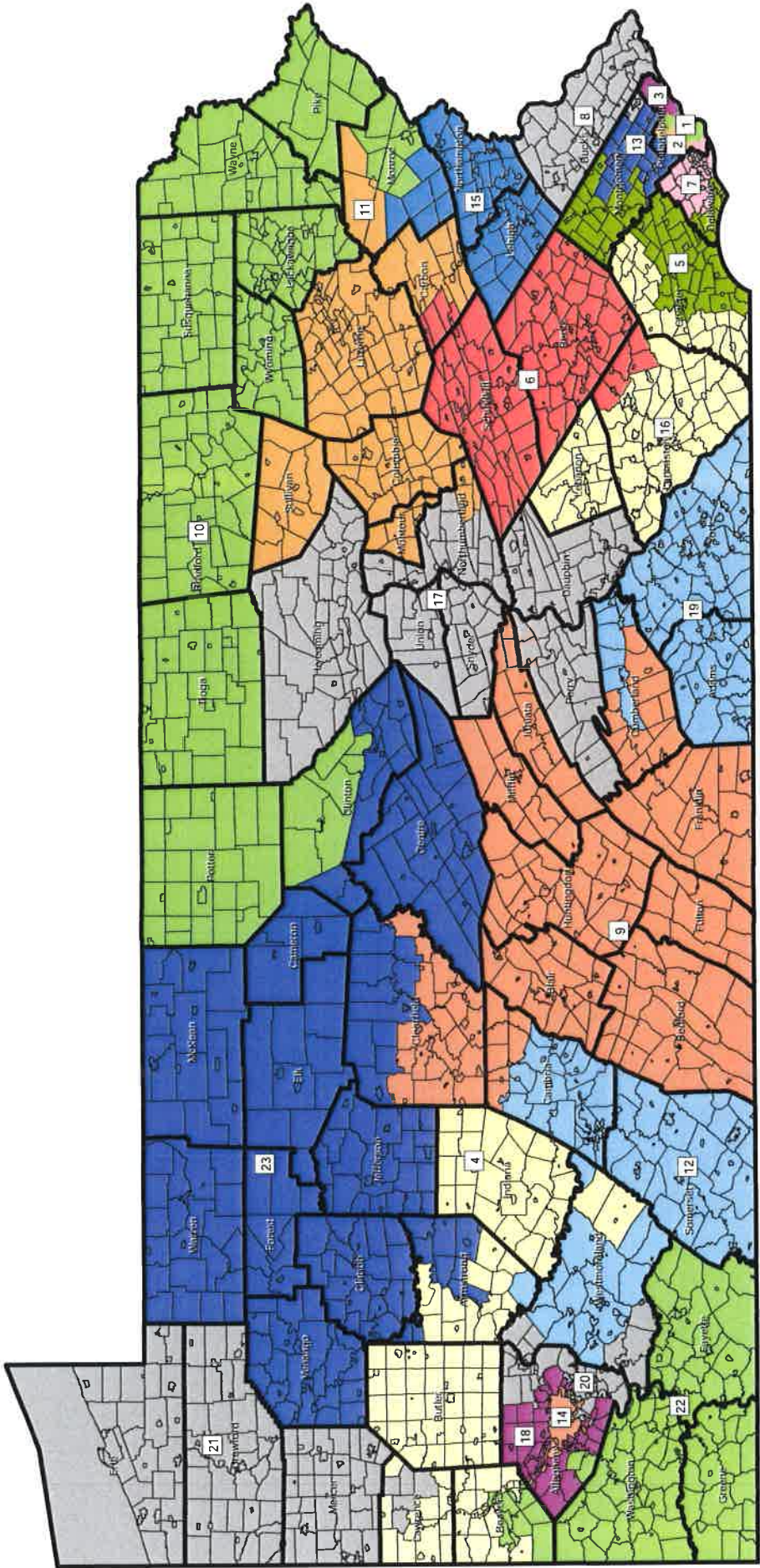
App. 0003

0578

App. 0004

10-11-2019 09:34

Pennsylvania Congressional Districts
Act 42 of 1982

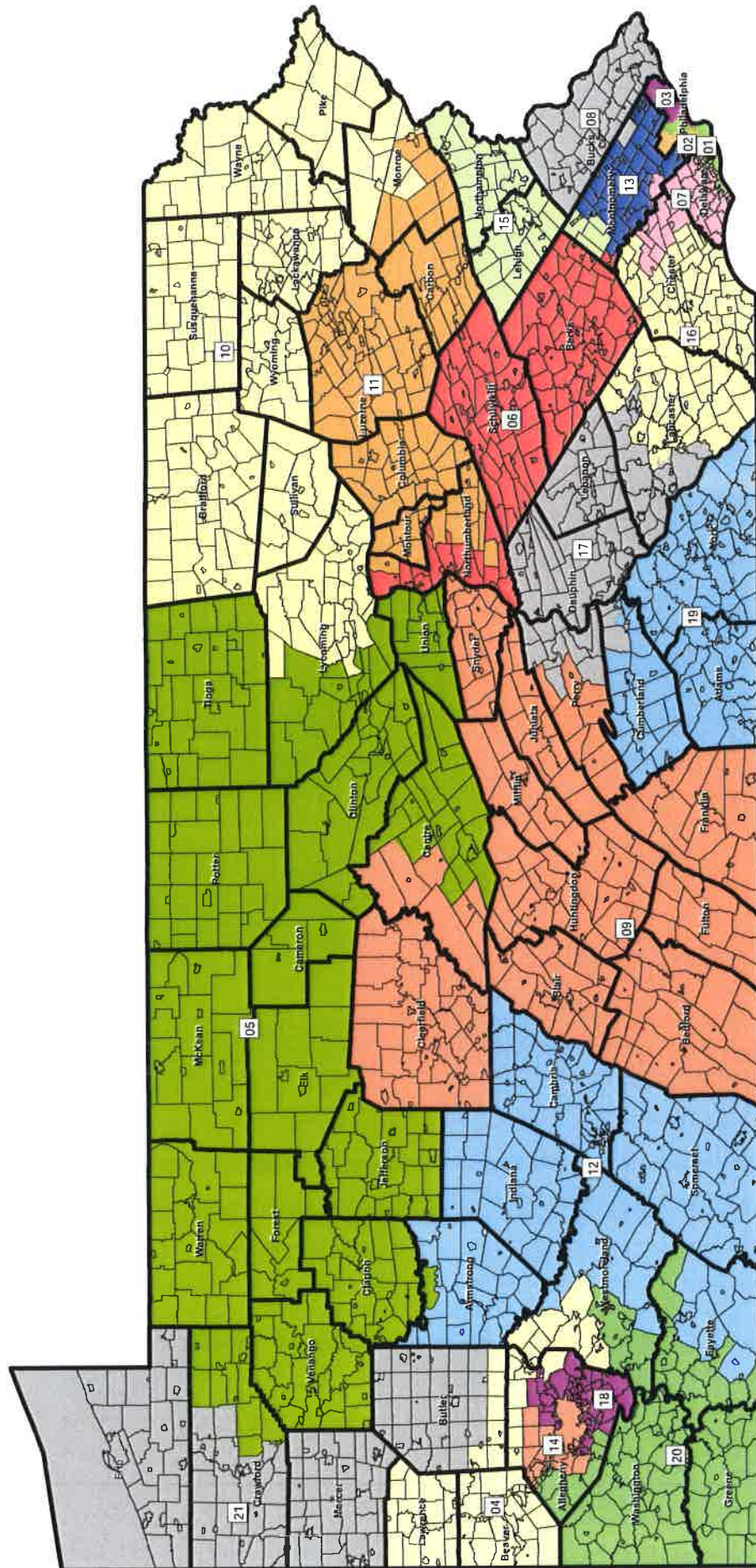


“Pennsylvania Congressional Districts Act 42 of 1982.” *Congressional Redistricting*,
21 June 2012, <http://www.redistricting.state.pa.us/Maps/index.cfm>

App. 0005

0580

Pennsylvania Congressional Districts
Enacted by order of the Supreme Court of Pennsylvania 10 March 1992

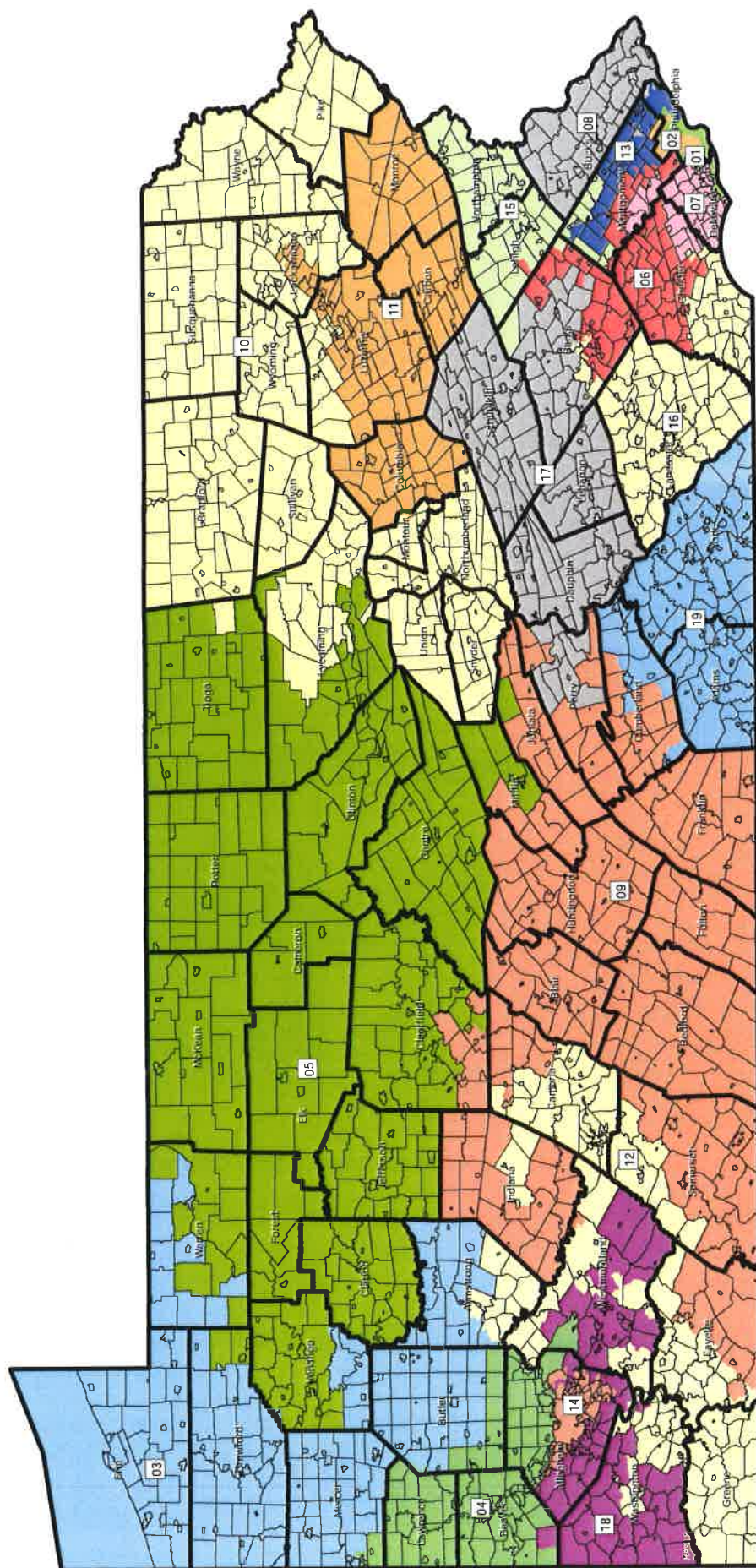


“Pennsylvania Congressional Districts. Enacted by order of the Supreme Court on March 10, 1992.” *Congressional Redistricting*,
21 June. 2012, <http://www.redistricting.state.pa.us/Maps/index.cfm>

App. 0006

0581

Pennsylvania Congressional Districts
Act 34 of 2002

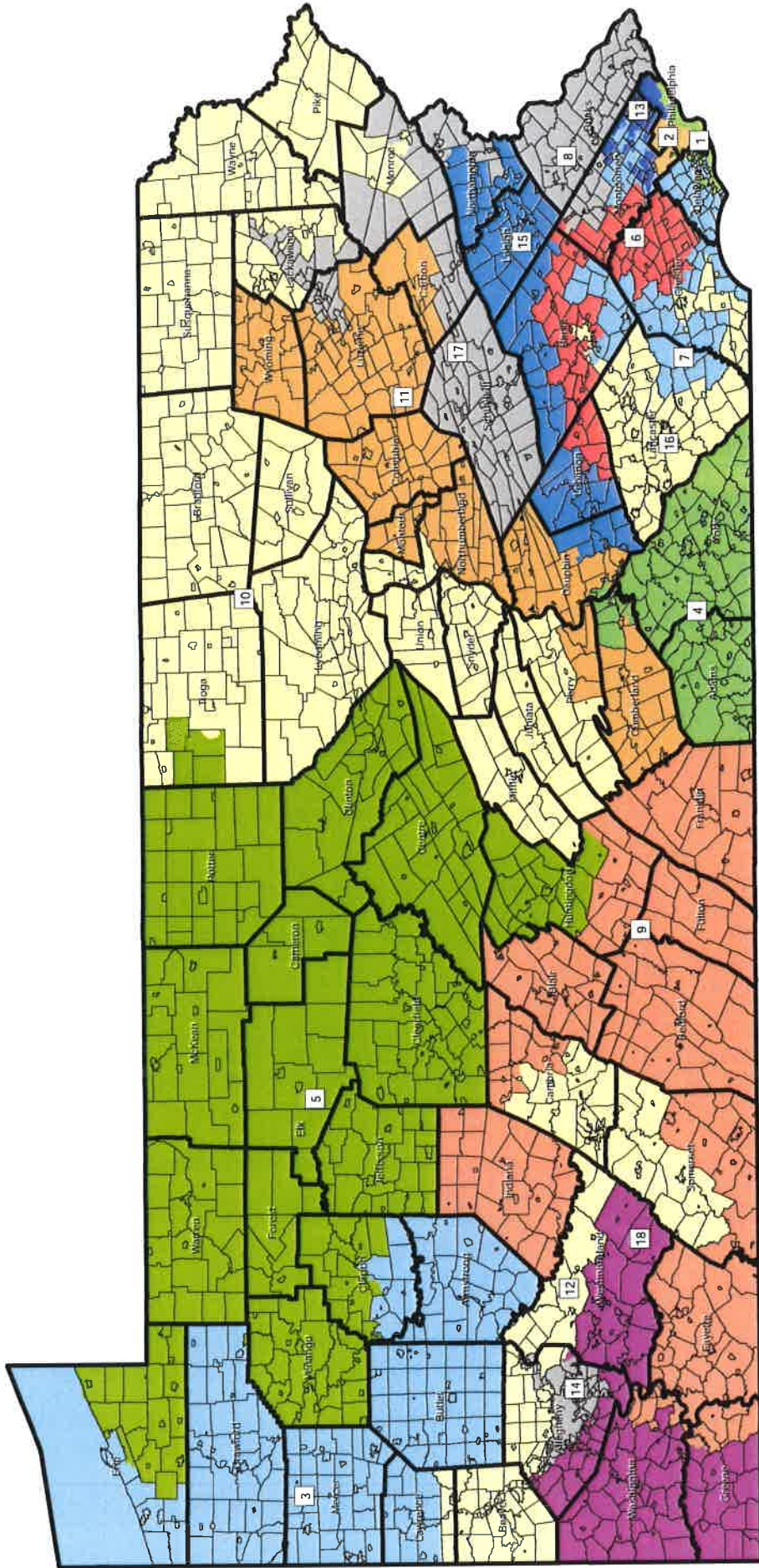


“Pennsylvania Congressional Districts Act” *Congressional Redistricting*, 21 June 2012, <http://www.redistricting.state.pa.us/Maps/index.cfm>

App. 0007

0582

Pennsylvania Congressional Districts
Act 131 of 2011

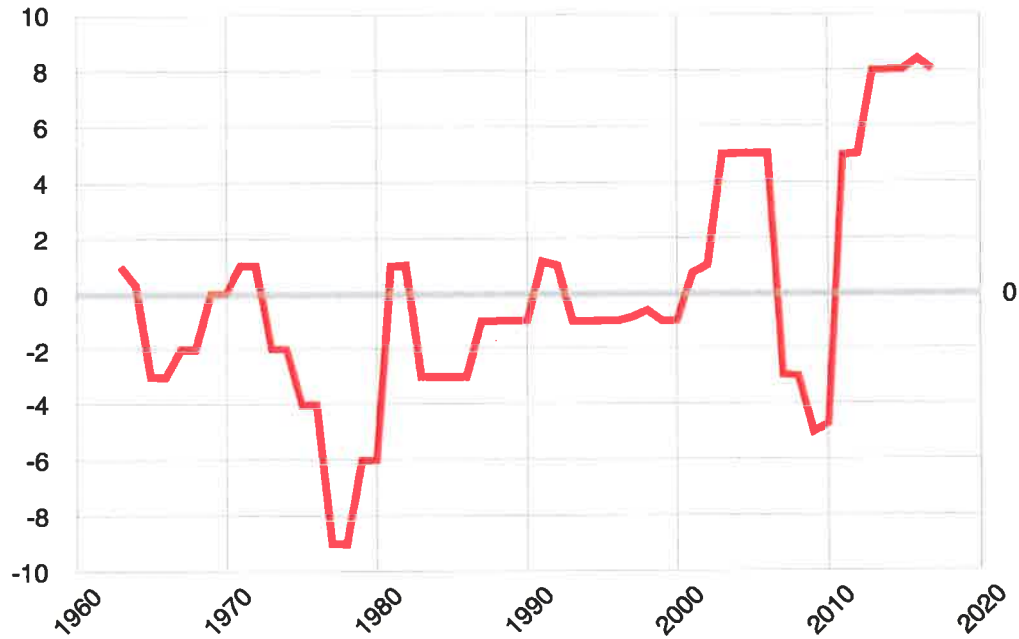


“Pennsylvania Congressional Districts Act 131 of 2011” Congressional Redistricting,
21 June. 2012, <http://www.redistricting.state.pa.us/Maps/index.cfm> App. 0008

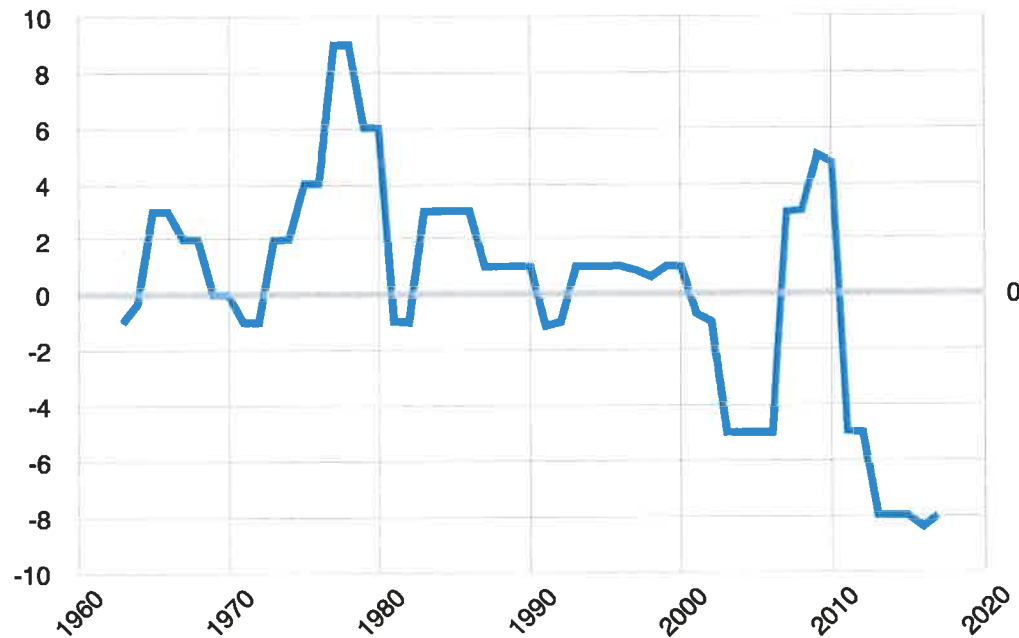
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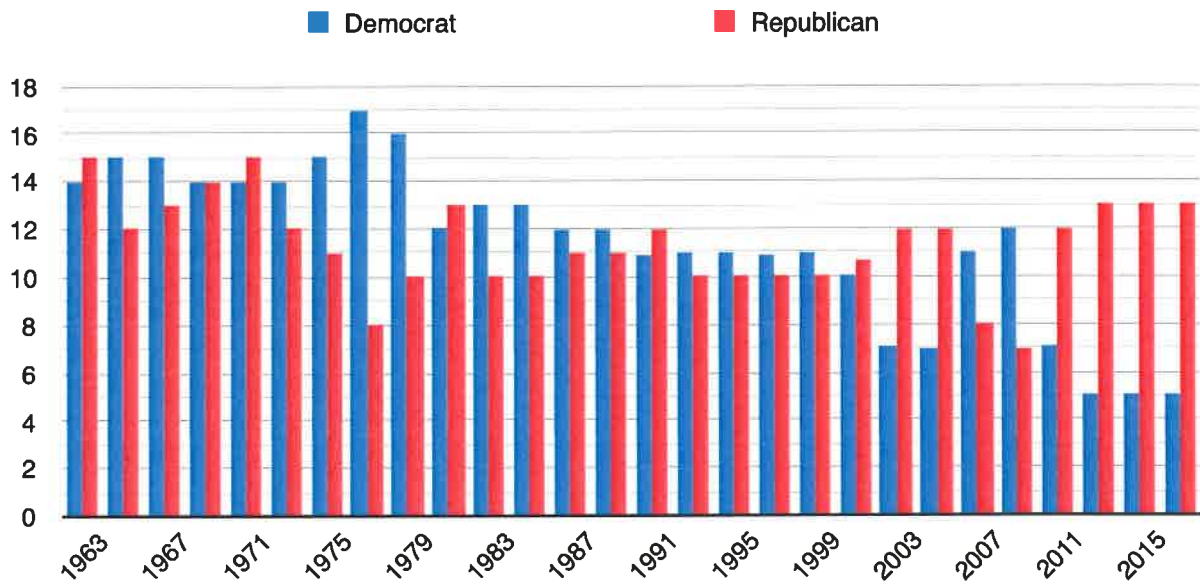
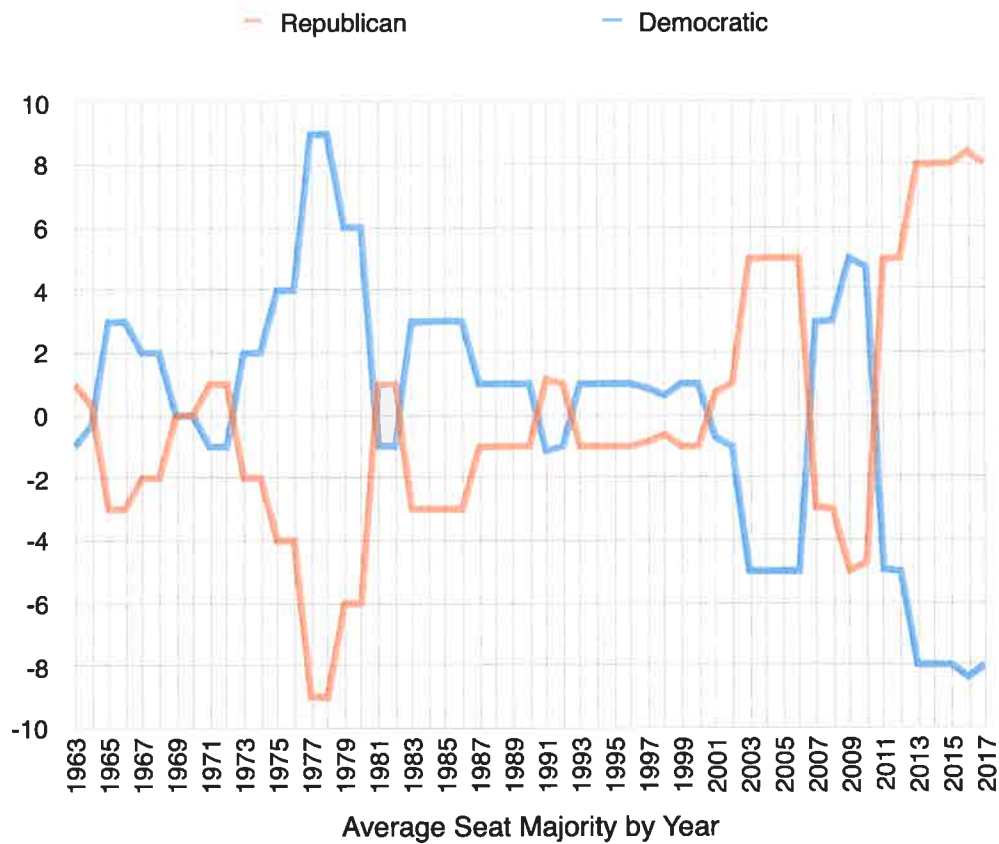
"This database is maintained through a combination of manual edits by volunteers (from GovTrack, ProPublica, MapLight, FiveThirtyEight, and others)..."

— Republican Seat Majority in the PA Congressional Delegation



— Democratic Seat Majority in the PA Congressional Delegation





109th Congress (Jan. 3 2005-Jan. 3 2007)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah	D
3	Phil English	R
4	Melissa Hart	R
5	John E. Peterson	R
6	Jim Gerlach	R
7	Curt Weldon	R
8	Mike Fitzpatrick	R
9	Bill Shuster	R
10	Don Sherwood	R
11	Paul E. Kanjorski	D
12	John Murtha	D
13	Allyson Schwartz	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Tim Holden	D
18	Tim Murphy	R
19	Todd Platts	R

110th Congress (Jan. 3 2007-Jan. 3 2009)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah	D
3	Phil English	R
4	Jason Altmire	D
5	John E. Peterson	R
6	Jim Gerlach	R
7	Joe Sestak	D
8	Patrick Murphy	D
9	Bill Shuster	R
10	Chris Carney	D
11	Paul E. Kanjorski	D
12	John Murtha	D
13	Allyson Schwartz	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Tim Holden	D
18	Tim Murphy	R
19	Todd Platts	R

111th Congress (Jan. 3 2009-Jan. 3 2011)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah	D
3	Kathy Dahlkemper	D
4	Jason Altmire	D
5	Glenn Thompson	R
6	Jim Gerlach	R
7	Joe Sestak	D
8	Patrick Murphy	D
9	Bill Shuster	R
10	Chris Carney	D
11	Paul E. Kanjorski	D
12	John Murtha (until Feb. 8, 2010), Mark Critz (from May 18, 2010)	D, D
13	Allyson Schwartz	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Tim Holden	D
18	Tim Murphy	R
19	Todd Platts	R

112th Congress (Jan. 3 2011-Jan. 3 2013)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah	D
3	Mike Kelly	R
4	Jason Altmire	D
5	Glenn Thompson	R
6	Jim Gerlach	R
7	Pat Meehan	R
8	Mike Fitzpatrick	R
9	Bill Shuster	R
10	Tom Marino	R
11	Lou Barletta	R
12	Mark Critz	D
13	Allyson Schwartz	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Tim Holden	D
18	Tim Murphy	R
19	Todd Platts	R

113th Congress (Jan. 3 2013-Jan. 3 2015)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah	D
3	Mike Kelly	R
4	Scott Perry	R
5	Glenn Thompson	R
6	Jim Gerlach	R
7	Pat Meehan	R
8	Mike Fitzpatrick	R
9	Bill Shuster	R
10	Tom Marino	R
11	Lou Barletta	R
12	Keith Rothfus	R
13	Allyson Schwartz	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Matt Cartwright	D
18	Tim Murphy	R

114th Congress (Jan. 3 2015-Jan. 3 2017)

Dist.	Name	Party
1	Bob Brady	D
2	Chaka Fattah (until June 23, 2016), Dwight Evans (from November 8, 2016)	D, D
3	Mike Kelly	R
4	Scott Perry	R
5	Glenn Thompson	R
6	Ryan Costello	R
7	Pat Meehan	R
8	Mike Fitzpatrick	R
9	Bill Shuster	R
10	Tom Marino	R
11	Lou Barletta	R
12	Keith Rothfus	R
13	Brendan Boyle	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Joseph R. Pitts	R
17	Matt Cartwright	D
18	Tim Murphy	R

115th Congress (Jan. 3 2017-Jan. 3 2019)

Dist.	Name	Party
1	Bob Brady	D
2	Dwight Evans	D
3	Mike Kelly	R
4	Scott Perry	R
5	Glenn Thompson	R
6	Ryan Costello	R
7	Pat Meehan	R
8	Brian Fitzpatrick	R
9	Bill Shuster	R
10	Tom Marino	R
11	Lou Barletta	R
12	Keith Rothfus	R
13	Brendan Boyle	D
14	Michael F. Doyle	D
15	Charlie Dent	R
16	Lloyd Smucker	R
17	Matt Cartwright	D
18	Tim Murphy (until October 21, 2017, seat now vacant)	R

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Timothy P. Briggs			
T	111400221	Briggs, Timothy P. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	17.85
T	111400221	Briggs, Timothy P. Meal Allowance, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	65.00

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Walter J. Casper			
T	100560027	Casper, Walter J. Meals Expense, House Majority Policy Committee Public Hearing on Redistricting. Presenting testimony at the request of the Policy Committee Chairman. 01/28/2010	3.27
T	100560027	Casper, Walter J. Staff Mileage, House Majority Policy Committee Public Hearing on Redistricting. Presenting testimony at the request of the Policy Committee Chairman. 01/28/2010	79.00

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Mark A. Clemson			
T	111650037	Clemson, Mark A. Lodging Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	162.41
T	111650037	Clemson, Mark A. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	17.09
T	111650037	Clemson, Mark A. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	2.50
T	111650037	Clemson, Mark A. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/09/2011	25.53
T	111650037	Clemson, Mark A. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/09/2011	2.30

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: John M. Dille			
T	111730032	Dille, John M. Lodging Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	162.41
T	111730032	Dille, John M. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	24.72
T	111730032	Dille, John M. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/08/2011	2.90
T	111730032	Dille, John M. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/09/2011	26.45
T	111730032	Dille, John M. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee congressional redistricting hearings in Cranberry Township (Butler County) Video Shoot - 06/09/2011	2.00

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Trans Voucher
Type Number

Payee/Description

Amount

Incurred by: **Representative George S. Dunbar**

T	111710162	Dunbar, George S. 36.72
		Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt.
		Public Hearing re:Congressional redistricting
		06/09/2011

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Trans Voucher
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Incurred by: **Representative Matthew M. Gabler**

T 111710165

Gabler, Matthew M.

124.44

Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt.

Public Hearing re:Congressional redistricting

06/09/2011

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<u>Trans</u>	<u>Voucher</u>		
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Incurred by: Representative Glen R. Grell			
T	111400216	Grell, Glen R. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	112.20
T	111710164	Grell, Glen R. Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt. Public Hearing re:Congressional redistricting 06/09/2011	224.40

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Amount

Incurred by: **Representative Seth M. Grove**

T	111710161	Grove, Seth M. Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt. Public Hearing re:Congressional redistricting 06/09/2011	240.72
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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Ralph A. Guida			
T	111650039	Guida, Ralph A. Lodging Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee Congressional redistricting hearings. Cranberry Township (Butler County) Video Shoot - R 06/08/2011	162.41
T	111650039	Guida, Ralph A. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee Congressional redistricting hearings. Cranberry Township (Butler County) Video Shoot - R 06/08/2011	23.75
T	111650039	Guida, Ralph A. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee Congressional redistricting hearings. Cranberry Township (Butler County) Video Shoot - R 06/08/2011	2.78
T	111650039	Guida, Ralph A. Meals Expense, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee Congressional redistricting hearings. Cranberry Township (Butler County) Video Shoot - R 06/09/2011	18.11
T	111650039	Guida, Ralph A. Meals Tip, Video Shoot - Reps. McIlhinney & Metcalfe to convene unprecedented, joint public state government committee Congressional redistricting hearings. Cranberry Township (Butler County) Video Shoot - R 06/09/2011	2.39

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Trans Voucher
Type Number

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Amount

Incurred by: **Representative Marcia M. Hahn**

T	111400223	Hahn, Marcia M. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	48.96
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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Kim A. Hileman			
T	111660160	Hileman, Kim A. Parking & Tolls, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/08/2011	30.17
T	111660160	Hileman, Kim A. Meals Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/08/2011	18.97
T	111660160	Hileman, Kim A. Meals Tip, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/08/2011	3.18
T	111660160	Hileman, Kim A. Staff Mileage, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/08/2011	228.48
T	111660160	Hileman, Kim A. Lodging Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/09/2011	76.30
T	111660160	Hileman, Kim A. Meals Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of June 9, 2011. Topic: Congressional Redistricting. 06/09/2011	11.57

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Joseph M. Hurlburt			
T	111380068	Hurlburt, Joseph M. Commercial Transportation, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of May 12, 2011. Topic: Congressional Redistricting. 05/12/2011	44.00
T	111380068	Hurlburt, Joseph M. Meals Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of May 12, 2011. Topic: Congressional Redistricting. 05/12/2011	17.92

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Trans Voucher
Type Number

Payee/Description

Amount

Incurred by: **Representative Scott E. Hutchinson**

T	111710168	Hutchinson, Scott E.	40.80
		Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt.	
		Public Hearing re:Congressional redistricting	
		06/09/2011	

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<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Justin L. Klos			
T	111860043	Klos, Justin L. Parking & Tolls, State Government Committee, Public Hearing on Congressional Redistricting 06/08/2011	34.20
T	111860043	Klos, Justin L. Staff Mileage, State Government Committee, Public Hearing on Congressional Redistricting 06/08/2011	241.74

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Jerome P. Knowles			
T	111400219	Knowles, Jerome P. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	30.60

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Daryl D. Metcalfe			
T	111400218	Metcalfe, Daryl D. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	111.18
T	111400218	Metcalfe, Daryl D. Meal Allowance, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	65.00

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative T. Mark Mustio			
T	111400214	Mustio, T. Mark	112.20
		Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting	
		05/12/2011	
T	111400214	Mustio, T. Mark	160.00
		Committee Per Diem, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting - 5/11/11 overnight stay prior to committee	
		05/12/2011	

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Helen F. Norton			
T	111400267	Norton, Helen F. Other Transportation Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of May 12, 2011. Topic: Congressional Redistricting. 05/12/2011	20.28
T	111400267	Norton, Helen F. Commercial Transportation, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of May 12, 2011. Topic: Congressional Redistricting. 05/12/2011	40.80
T	111400267	Norton, Helen F. Meals Expense, State Government Committee Business. Joint hearing of the House and Senate State Government Committees to be held morning of May 12, 2011. Topic: Congressional Redistricting. 05/12/2011	29.87

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Amount

Incurred by: **Representative Michael T. Peifer**

T	113330056	Peifer, Michael T. Mileage Other, Redistricting meeting in Harrisburg 11/29/2011
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166.50

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Amount

Incurred by: **Representative Tina L. Pickett**

T 113320105 Pickett, Tina L.
Meal Allowance, Redistricting Meeting in Harrisburg
11/29/2011

52.00

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: David L. Reddecliff			
T	111170113	Reddecliff, David L. Parking & Tolls, To attend Redistricting Discussions with Congressmen 03/30/2011	41.00
T	111170113	Reddecliff, David L. Lodging Expense, To attend Redistricting Discussions with Congressmen: Hyatt Regency Washington, DC on Capitol Hill (Shared Room w/ Bill Schaller) 03/30/2011	462.58
T	111170113	Reddecliff, David L. Staff Mileage, To attend Redistricting Discussions with Congressmen 03/30/2011	124.95

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Amount

Incurred by: **Representative Bradley T. Roae**

T	111710166	Roae, Bradley T. Mileage Committee, Cranberry Township, PA - State Government Cmt. - Jt. House and Senate Government Cmt. Public Hearing re:Congressional redistricting 06/09/2011	71.40
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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: William R. Schaller			
T	111400270	Schaller, William R. Commercial Transportation, Attend State Government committee hearing on redistricting. 05/12/2011	40.00
T	111470054	Schaller, William R. Meals Expense, To attend Redistricting Discussions with Congressmen. 03/30/2011	28.90
T	111470054	Schaller, William R. Meals Tip, To attend Redistricting Discussions with Congressmen. 03/30/2011	5.00

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Jerry A. Stern			
T	111400217	Stern, Jerry A. Mileage Committee, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	115.26
T	111400217	Stern, Jerry A. Meal Allowance, Philadelphia, PA - State Government Committee - Public Hearing regarding Congressional redistricting 05/12/2011	65.00

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<u>Trans</u>	<u>Voucher</u>		
<u>Type</u>	<u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Tarah C. Toohil			
T	113390114	Toohil, Tarah C. Mileage Other, Redistricting Meeting in Harrisburg 11/29/2011	117.11

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<u>Trans</u> <u>Type</u>	<u>Voucher</u> <u>Number</u>	<u>Payee/Description</u>	<u>Amount</u>
Incurred by: Representative Michael C. Turzai			
T	111400319	Turzai, Michael C. Staff Meals, To attend Redistricting Discussions with Congressmen: Shamrock Restaurant 03/30/2011	28.90
T	111400319	Turzai, Michael C. Meals Tip, To attend Redistricting Discussions with Congressmen: Shamrock Restaurant 03/30/2011	5.00
T	111400319	Turzai, Michael C. Lodging Expense, To attend Redistricting Discussions with Congressmen: Hyatt Regency Washington, DC on Capitol Hill (only submitting half of room charge) 03/30/2011	231.29
T	111400319	Turzai, Michael C. Meals Expense, To attend Redistricting Discussions with Congressmen: Shamrock Restaurant 03/30/2011	28.90
T	111400319	Turzai, Michael C. Meals Tip, To attend Redistricting Discussions with Congressmen: Shamrock Restaurant 03/30/2011	5.00

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EXHIBIT A

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0166

Declaration of Michael P. Persoon

1. My name is Michael P. Persoon.
2. I am an adult male over the age of 18 and resident of Cook County, Illinois.
3. I make this declaration to verify that I personally accessed and printed certain website and documents stored online.
4. I searched for and printed these documents primarily in connection with the lawsuit *Agre, et al. v. Wolf, et al.*, Case No. 17-cv-4392 (E.D. Pa.).
5. I personally viewed and printed the document attached as Exhibit A to this declaration on October 10, 2017, from my office located at 77 W. Washington St., Ste. 711 in Chicago, Illinois.
6. The document attached as Exhibit A was printed from the website:
<http://www.redistrictingmajorityproject.com/?p=646>
7. I make the foregoing statement subject to penalty of perjury or other penalty as provided by Illinois law.

Date:

10/10/17

MR

Michael P. Persoon

State of Illinois, County of Cook

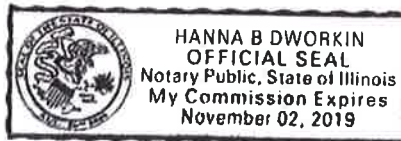
This instrument was acknowledged

before me on Oct 10, 2017

by Michael P. Persoon

[Signature]

signature of notary public



App. 0043

0586

HOME ABOUT REDISTRICTING IN YOUR STATE

A PROGRAM OF THE REPUBLICAN STATE LEADERSHIP COMMITTEE
EVERY 10 YEARS A CENSUS IS TAKEN, AND CONGRESSIONAL DISTRICTS ARE REDRAWN.
THIS PROCESS IS KNOWN AS "REDISTRICTING," AND IS ONE OF THE MOST IMPORTANT
PROCESSES IN OUR DEMOCRACY. WE FIGHT FOR A FAIR PROCESS - JOIN US.

2012 REDMAP Summary Report

Written by admin
 Friday, 4 January 2013 09:23

REDMAP

How a Strategy of Targeting State Legislative Races in 2010

Led to a Republican U.S. House Majority in 2013

On November 6, 2012, Barack Obama was reelected President of the United States by nearly a three-point margin, winning 332 electoral votes to Mitt Romney's 206 while garnering nearly 3.5 million more votes. Democrats also celebrated victories in 69 percent of U.S. Senate elections, winning 23 of 33 contests. Farther down-ballot, aggregated numbers show voters pulled the lever for Republicans only 49 percent of the time in congressional races, suggesting that 2012 could have been a repeat of 2008, when voters gave control of the White House and both chambers of Congress to Democrats.

But, as we see today, that was not the case. Instead, Republicans enjoy a 33-seat margin in the U.S. House seated yesterday in the 113th Congress, having endured Democratic successes atop the ticket and over one million more votes cast for Democratic House candidates than Republicans. The only analogous election in recent political history in which this aberration has taken place was immediately after reapportionment in 1972, when Democrats held a 50 seat majority in the U.S. House of Representatives while losing the presidency and the popular congressional vote by 2.6 million votes.

To be sure, the National Republican Congressional Committee (NRCC) built on its strong recruitment and successful strategy that gave them a Republican majority in 2010 by going on offense over Democratic cuts to Medicare and by linking their Democratic opponents to President Obama's most unpopular policy proposals.

However, all components of a successful congressional race, including recruitment, message development and resource allocation, rest on the congressional district lines, and this was an area where Republicans had an unquestioned advantage.

Today, nearly two months after Election Day, and one day after the 113th United States Congress took the Oath of Office on Capitol Hill, the Republican State Leadership Committee (RSLC) is releasing this review of its strategy and execution of its efforts in the 2010 election cycle to erect a Republican firewall through the redistricting process that paved the way to Republicans retaining a U.S. House majority in 2012.

2010 State Elections: REDMAP's Execution

As the 2010 Census approached, the RSLC began planning for the subsequent election cycle, formulating a strategy to keep or win Republican control of state legislatures with the largest impact on congressional redistricting as a result of reapportionment. That effort, the REDistricting Majority Project (REDMAP), focused critical resources on legislative chambers in states projected to gain or lose congressional seats in 2011 based on Census data.

The rationale was straightforward: Controlling the redistricting process in these states would have the greatest impact on determining how both state legislative and congressional district boundaries would be drawn. Drawing new district lines in states with the most redistricting activity presented the opportunity to solidify conservative policymaking at the state level and maintain a Republican stronghold in the U.S. House of Representatives for the next decade.

To fund the initiative, the RSLC raised more than \$30 million in 2009-2010, and invested \$18 million after Labor Day 2010 alone. Specifically, the RSLC:

- Spent \$1.4 million targeting four New York State Senate seats, winning two and control of the New York State Senate. (-2 Congressional seats).
- Spent nearly \$1 million in Pennsylvania House races, targeting and winning three of the toughest races in the state. (-1 Congressional seat).
- Spent nearly \$1 million in Ohio House races, targeting six seats, five of which were won by Republicans. Notably, President Obama carried five of these six legislative districts in 2008. (-2 Congressional seats).
- Spent \$1 million in Michigan working with the Michigan House Republican Campaign Committee and Michigan Republican Party to pick up 20 seats. (-1 Congressional seat).
- Spent \$750,000 in Texas as part of an effort that resulted in 22 House pick-ups. (+4 Congressional seats).
- Spent \$1.1 million in Wisconsin to take control of the Senate and Assembly.
- Committed resources to Colorado (more than \$550,000) and North Carolina (more than \$1.2 million).
- The RSLC also invested more than \$3 million across a number of other states including Illinois, Indiana, Iowa, Kentucky, Maine, Nevada, New Hampshire, New Jersey, Oregon, Tennessee and Washington. (Five of these eleven states gained or lost Congressional seats).

Election Day 2010 proved to be a "wave" election nationally, in both REDMAP targeted states and others across the country. Prior to Election Day 2010, Democrats controlled 60 state legislative chambers to the Republicans' 36. After the 2010 elections, Democrats

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Join the Fight
Join the RSLC



10/10/2017

The RSLC Redistricting Majority Project – REDMAP

controlled 40 chambers. Republicans controlled 55 chambers, and two remained tied. In all, Republicans took control of 21 legislative bodies and moved one from Democratic control to being evenly divided. After Election Day 2010, Republicans held majorities in both legislative chambers in 25 states – and, in most cases, control of redistricting – up from 14. The result can clearly be seen in the following chart showing partisan control over redistricting from 1980 to 2010:

Year	Republican	Democrat	Split	Commission	At Large	Total
1981	53	225	149	2	6	435
1991	5	172	240	11	7	435
2001	98	135	161	34	7	435
2011	193	44	103	88	7	435
<i>Change from 2001</i>	<i>+ 95</i>	<i>-91</i>	<i>-58</i>	<i>+ 54</i>	<i>0</i>	<i>0</i>

* Source: Republican National Committee, December 2, 2010

...

2012 Congressional Elections: REDMAP's Impact

President Obama won reelection in 2012 by nearly 3 points nationally, and banked 126 more electoral votes than Governor Mitt Romney. Democratic candidates for the U.S. House won 1.1 million more votes than their Republican opponents. But the Speaker of the U.S. House of Representatives is a Republican and presides over a 33-seat House Republican majority during the 113th Congress. How? One needs to look no farther than four states that voted Democratic on a statewide level in 2012, yet elected a strong Republican delegation to represent them in Congress: Michigan, Ohio, Pennsylvania and Wisconsin.

Michigan

The effectiveness of REDMAP is perhaps most clear in the state of Michigan. In 2010, the RSLC put \$1 million into state legislative races, contributing to a GOP pick-up of 20 seats in the House and Republican majorities in both the House and Senate. Republican Rick Snyder won the gubernatorial race, and with it Republicans gained control of redrawing Michigan's 148 legislative and 14 congressional districts. The 2012 election was a huge success for Democrats at the statewide level in Michigan: voters elected a Democratic U.S. Senator by more than 20 points and reelected President Obama by almost 10 points. But Republicans at the state level maintained majorities in both chambers of the legislature and voters elected a 9-5 Republican majority to represent them in Congress.

Ohio

Ohio once again proved to be the national bellwether, voting to reelect President Obama to a second term in the White House by almost two points. On the statewide level, Ohioans also elected a Democrat to the U.S. Senate by more than five points. But the Republican firewall at the state legislative and congressional level held. In 2010, REDMAP allocated nearly \$1 million to Ohio House races, resulting in a Republican take over of the House and increasing the GOP majority in the Senate. With the election of Republican John Kasich to the governor's mansion, the GOP controlled the redrawing of 132 state legislative and 16 congressional districts. Republican redistricting resulted in a net gain for the GOP state House caucus in 2012, and allowed a 12-4 Republican majority to return to the U.S. House of Representatives – despite voters casting only 52 percent of their vote for Republican congressional candidates.

Pennsylvania

A REDMAP target state, the RSLC spent nearly \$1 million in Pennsylvania House races in 2010 – an expenditure that helped provide the GOP with majorities in both chambers of the state legislature. Combined with former Republican Attorney General Tom Corbett's victory in the gubernatorial race, Republicans took control of the state legislative and congressional redistricting process. The impact of this investment at the state level in 2010 is evident when examining the results of the 2012 election: Pennsylvanians reelected a Democratic U.S. Senator by nearly nine points and reelected President Obama by more than five points, but at the same time they added to the Republican ranks in the State House and returned a 13-5 Republican majority to the U.S. House.

Wisconsin

In 2010, the RSLC spent \$1.1 million to successfully flip both chambers of the Wisconsin legislature. With the election of Republican Governor Scott Walker, the GOP gained control of the redistricting process and gave Wisconsinites and all of America a firsthand look at what bold conservative leadership looks like. In mid-2012, Democrats were able to regain control of the Wisconsin Senate, albeit for a period of time when the chamber was out of session. In November 2012, however, running on lines redrawn after the successes of 2010, Republicans were able to retake the Senate and add to their margins in the House. On a statewide level, in 2012, Wisconsin voters elected a Democratic U.S. Senator by nearly six points and reelected President Obama by nearly seven points, but still returned a 5-3 Republican majority to Congress, including the GOP vice presidential nominee, Representative Paul Ryan.

Conclusion

After REDMAP's success on Election Day 2010, Republicans held majorities in 10 of the 15 states that gained or lost U.S. House seats and where the legislature played a role in redrawing the state legislative and congressional district map. In the 70 congressional districts that were labeled by National Public Radio as "competitive" in 2010, Republicans controlled the redrawing of at least 47 of those districts; Democrats were responsible for 15, and a non-partisan process determined eight.

REDMAP's effect on the 2012 election is plain when analyzing the results: Pennsylvanians cast 83,000 more votes for Democratic U.S. House candidates than their Republican opponents, but elected a 13-5 Republican majority to represent them in Washington; Michiganders cast over 240,000 more votes for Democratic congressional candidates than Republicans, but still elected a 9-5 Republican delegation to Congress. Nationwide, Republicans won 54 percent of the U.S. House seats, along with 58 of 99 state legislative chambers, while winning only 8 of 33 U.S. Senate races and carrying only 47.8 percent of the national presidential vote.

State elections can have a big impact on a political party's performance in future federal elections, not only by building a strong "bench" and strengthening party infrastructure, but also through the decennial redistricting process. As the largest caucus of

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10/10/2017

The RSLC Redistricting Majority Project -- REDMAP

Republican state-level officeholders, the RSLC understands the importance of this. The REDMAP effort implemented during the 2010 election cycle focused resources on critical state-level races in states projected to gain or lose congressional seats in reapportionment, and realized enormous success on Election Day in 2010. The RSLC's vision and foresight in undertaking such an effort was further validated in 2012 by remarkable Republican success in down-ballot races, thereby allowing a Republican House of Representatives to return to Washington as an important check and balance of power in our nation's capital.

This entry was posted on Friday, January 4th, 2013 at 9:23 am and is filed under Uncategorized. You can follow any responses to this entry through the RSS 2.0 feed. You can leave a response, or trackback from your own site.

Leave a Reply

Name (Required)

Mail (will not be published) (Required)

Website

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[HOME](#) / 2012 REDMAP SUMMARY REPORT

Paid for by the Republican State Leadership Committee
www.RSLC.com

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0590

Declaration of Michael P. Persoon

1. My name is Michael P. Persoon.
2. I am an adult male over the age of 18 and resident of Cook County, Illinois.
3. I make this declaration to verify that I personally accessed and printed certain website and documents stored online.
4. I searched for and printed these documents primarily in connection with the lawsuit *Agre, et al. v. Wolf, et al.*, Case No. 17-cv-4392 (E.D. Pa.).
5. I personally viewed and printed the document attached as Exhibit A to this declaration on October 10, 2017, from my office located at 77 W. Washington St., Ste. 711 in Chicago, Illinois.
6. The document attached as Exhibit A was printed from the website:
<https://rslc.gop/blog/2015/07/16/rslc-launches-redmap-2020-sets-125-million-investment-goal/>
7. I make the foregoing statement subject to penalty of perjury or other penalty as provided by Illinois law.

Date:

10/10/17

MP

Michael P. Persoon

State of Illinois, County of Cook

This instrument was acknowledged

before me on Oct 10, 2017

by Michael P. Persoon

[Signature]
signature of notary public



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0591



(<https://rslc.gop/>)



[[HTTPS://RSLC.GOP](https://rslc.gop/)] > [NEWS \(HTTPS://RSLC.GOP/NEWS/\)](https://rslc.gop/news/) > RSLC LAUNCHES REDMAP 2020, SETS \$125 MILLION INVESTMENT GOAL

RSLC Launches REDMAP 2020, Sets \$125 Million Investment Goal

JULY 16, 2015 / [RSLC NEWS \(HTTPS://RSLC.GOP/BLOG/CATEGORY/RSLC-NEWS/\)](https://rslc.gop/blog/category/rslc-news/)

WASHINGTON, D.C. – Today, the Republican State Leadership Committee (RSLC) – in partnership with its strategic policy partner, the State Government Leadership Foundation (SGLF) – launched REDMAP 2020 with a \$125 million investment goal through 2022. REDMAP 2020 is modeled after the RSLC's successful REDistricting MAjority Project (REDMAP) program in 2010 that was instrumental in Republicans picking up 21 new legislative majorities that year and putting Republicans in a strong position before the decade's redistricting. Similarly, REDMAP 2020 will prioritize electing Republican legislators in states across the country in an effort to keep and expand Republican-controlled legislative chambers in advance of 2020 redistricting. Also as part of REDMAP 2020, the SGLF will now help the Republican redistricting data acquisition efforts and provide targeted legal strategic advice in redistricting cases.

"We are launching REDMAP 2020 to stay on offense at a time when Republicans are at historic highs in state chambers around the country," said RSLC Chairman Bill McCollum. "The launch of REDMAP 2010 marked the beginning of strong gains in the number of Republican-controlled legislative bodies at the state level that led to helping both solidify a Republican majority in the U.S. House of Representatives and winning back the U.S. Senate a few years later. It's important to maintain that success at all levels of government, and by investing \$125 million over the next seven years, we plan to help do just that."

"When we started REDMAP in 2010, we were able to utilize the in-depth knowledge and resources of the RSLC's vast network of Republican elected leaders who represent all 50 states," said SGLF Chairman and former NRCC Chairman Tom Reynolds. Reynolds served as REDMAP Chairman in 2010. "To now expand that role from winning critical legislative majorities that help shape the redistricting process to also providing targeted legal strategic advice and commentary for ongoing redistricting legislation is exciting for the REDMAP 2020 program. It's exciting for the future of the Republicans Party."

Through REDMAP 2010, the RSLC raised \$30 million and led Republicans to take control of 21 new chambers, including capturing control of both chambers in several states President Obama went on to win twice: Michigan, Ohio, Pennsylvania, and Wisconsin. Republicans today control a Party-record 69 of 99 state legislative chambers. REDMAP 2020 will work to maintain the historic highs we hold

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today, including those in Obama-blue states, while working to pick up additional majorities in states like Kentucky, Maine and New Mexico where the legislatures play a vital role in crafting district boundaries, and Republicans currently control only one of the two state chambers.

As part of REDMAP 2020, the RSLC's strategic policy partner the SGLF will take on an increased role in helping to support the Republican Party's data acquisition efforts. The SGLF will also actively file amicus briefs with controlling authorities for select cases in states as it relates to redistricting.



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RSLC Video



<https://www.youtube.com/embed/15dPwtZjokc>

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0594

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6. The document attached as Exhibit A was printed from the website:
<https://rslc.gop/blog/2015/03/24/rslc-congratulates-martina-white-on-election-to-pennsylvania-house-of-representatives/>
7. I make the foregoing statement subject to penalty of perjury or other penalty as provided by Illinois law.

Date: 10/10/17



Michael P. Persoon

State of Illinois, County of Cook

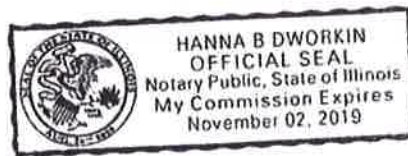
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(<https://rslc.gop/>)



[HTTPS://RSLC.GOP](https://rslc.gop/) > [NEWS \(HTTPS://RSLC.GOP/NEWS/\)](https://rslc.gop/news/) > RSLC CONGRATULATES MARTINA WHITE ON ELECTION TO PENNSYLVANIA HOUSE OF REPRESENTATIVES

RSLC Congratulates Martina White on Election to Pennsylvania House of Representatives

 MARCH 24, 2015 /  [RSLC NEWS \(HTTPS://RSLC.GOP/BLOG/CATEGORY/RSLC-NEWS/\)](https://rslc.gop/blog/category/rslc-news/)

WASHINGTON, D.C. – Tonight the Republican State Leadership Committee (RSLC) on behalf of the Republican Legislative Campaign Committee (RLCC) congratulated Martina White on her victory in the special election for District 170 in the Pennsylvania House of Representatives. The seat was vacated by Democrat Brendan Boyle after his election to the U.S. House of Representatives. RSLC President Matt Walter issued the following statement:

“With a strong business background and deep roots in Northeast Philadelphia, Martina proved today that she can unite the community around her and is ready to stand up for them in Harrisburg.”

In the final week of White’s campaign, the RSLC launched digital ads in support of her. The ad buy reached voters in White’s district in Northeast Philadelphia and can be seen below.



[\(http://votemartinawhite.com/\)](http://votemartinawhite.com/)



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SEPTEMBER 29, 2017

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SEPTEMBER 22, 2017

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6. The document attached as Exhibit A was printed from the website:
<https://rslc.gop/blog/2015/07/16/the-2020-redistricting-war-is-already-on/>
7. I make the foregoing statement subject to penalty of perjury or other penalty as provided by Illinois law.

Date:

10/10/17



Michael P. Persoon

State of Illinois, County of Cook

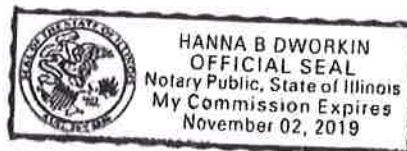
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■ ([HTTPS://RSLC.GOP](https://rslc.gop/)) > [NEWS \(HTTPS://RSLC.GOP/NEWS/\)](https://rslc.gop/news/) > THE 2020 REDISTRICTING WAR IS (ALREADY) ON

The 2020 redistricting war is (already) on

📅 JULY 16, 2015 / ■ [RSLC NEWS \(HTTPS://RSLC.GOP/BLOG/CATEGORY/RSLC-NEWS/\)](https://rslc.gop/blog/category/rslc-news/)

Washington Post (<http://www.washingtonpost.com/blogs/the-fix/wp/2015/07/16/the-2020-redistricting-war-is-on/>)

There's a hundred-million-dollar battle brewing for control of Congress, but it's not going to be resolved for seven more years, and the battles will take place in lands far away from Washington.

Both Democrats and Republicans think controlling state legislatures in 2020 is one of the most important political battles to fight, mostly for one reason: The power of the pen — the kind that draws district lines, that is.

Five years out, both sides are in a fundraising battle to build war chests of \$70 million to \$125 million to swing state legislatures their way by 2020, when new electoral maps will get drawn across the country. The Republican State Leadership Committee announced Thursday it's launching RedMap 2020 and aiming to invest \$125 million to expand their majority in the statehouses and redraw the nation's electoral lines.

They're playing the long game, but as Republicans showed in 2010, investing in state races is one of the best bangs-for-your-buck to swing Washington the way you want it.

"The implications of the state-level races reach all the way up to the U.S. Capitol," said Matt Walter, the president of the RSLC, which works to keep Republicans in state legislatures.

Redistricting has always been important to the political process, but in an age in which Americans are increasingly polarized — and technology allows for even-more-effective gerrymandering — the shapes and demographics of the districts that are drawn is even more decisive when it comes to control of Congress.

Every 10 years, based on new U.S. Census data, states redraw their legislative and congressional districts. In about 43 states (<http://www.washingtonpost.com/blogs/the-fix/wp/2015/06/29/the-supreme-courts-ruling-in-favor-of-redistricting-commissions-explained/>), state lawmakers get to decide how to do this. It's an inherently political tool to help create beneficial districts for whichever party's in power.

App. 0056
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tabbies

And in 2010, Republicans showed just how much can be gained from dominating that process. Fueled by millionaire Art Pope, they invested \$30 million into winning state legislature battles — particularly states where the legislature was up for grabs, and it had a say in redistricting. In the grand scheme of politics, that's not that much money — but it had a huge impact (thanks in part, of course, to the GOP wave year).

Republicans picked up 675 state legislative seats, gaining control of 12 more state legislatures. The GOP in total controlled about three times as many states in the redistricting process — including many big, swing-y states where the lines are even more fungible and important.

New lines were drawn, and in 2012, Republicans took over the House of Representatives with a commanding 234-201 majority — despite the fact Democratic House candidates got 1.4 million more votes than Republican candidates. Some analysts think the current map is such that Democrats simply won't be able to win a majority on it, barring a massive wave in their direction.

"It really helped redefine how the American political system looks at the redistricting process," Walter said.

After another great 2014 midterm election for Republicans, the party now controls an all-time high of 68 of 98 state chambers. That's the potential to rewrite a lot of lines.

Sensing a winning game plan, Democrats are getting in now, too. They launched Advantage 2020 last year, a super PAC that hopes to raise \$70 million to play exclusively in states where redistricting is on the line. (Compare that with the \$10 million they raised in 2010.)

They'll play in state races in more than a dozen states with the end game of capturing "a couple dozen" congressional seats in the midterms of 2022, Advantage 2020 Director Mark Schauer said.

"Once the lines are redrawn in 2021, the Democrats will have a tremendous opportunity to recapture the majority," Schauer said.

Expect the first of the redistricting battles to take place a little closer to Capitol Hill: Control of the Virginia senate is in question in the fall.

You can bet RedMap 2020 and Advantage 2020 will be there, with an eye toward the future.



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5. I personally viewed and printed the document attached as Exhibit A to this declaration on October 10, 2017, from my office located at 77 W. Washington St., Ste. 711 in Chicago, Illinois.
6. The document attached as Exhibit A was printed from the website:
http://www.redistrictingmajorityproject.com/?page_id=2
7. I make the foregoing statement subject to penalty of perjury or other penalty as provided by Illinois law.

Date: 10/10/17


Michael P. Persoon

State of Illinois, County of Cook

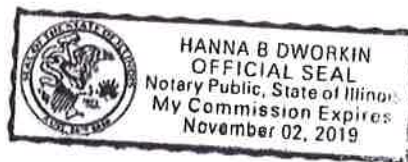
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REDISTRICTING IN YOUR STATE

A PROGRAM OF THE REPUBLICAN STATE LEADERSHIP COMMITTEE
EVERY 10 YEARS A CENSUS IS TAKEN, AND CONGRESSIONAL DISTRICTS ARE REDRAWN. THIS PROCESS IS KNOWN AS "REDISTRICTING," AND IS ONE OF THE MOST IMPORTANT PROCESSES IN OUR DEMOCRACY. WE FIGHT FOR A FAIR PROCESS - JOIN US.

About

What is redistricting and why does it matter?

At the conclusion of the 2010 national census, congressional seats will be reapportioned to each state. The states with a shrinking population will lose congressional seats and states with a population boom will gain seats. A massive effort to redraw state legislative and congressional lines will take place according to each state's laws. The party controlling that effort controls the drawing of the maps – shaping the political landscape for the next 10 years. In 38 states, governors and state legislators play a determining role in the redistricting process.

What is REDMAP?

REDMAP (REDistricting Majority Project) is a program of the RSLC dedicated to winning state legislative seats that will have a critical impact on congressional redistricting in 2011.

How can REDMAP succeed?

REDMAP succeeds with your help. Only by staying up-to-date on the latest news, and engaging your friends and family about the importance of our effort, can we succeed.

How can I help?

REDMAP is a grassroots effort. We are funded solely through contributions from commonsense conservatives throughout the country – and we rely on grassroots conservatives as our best means of alerting fellow conservatives across the country to our efforts. [Make a donation here today.](#)

Donate

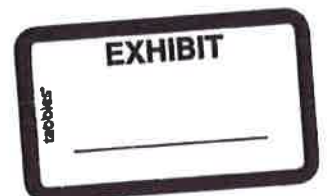
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The RSLC Redistricting Majority Project – REDMAP

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Date:

10/10/17

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Michael P. Persoon

State of Illinois, County of Cook

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by Michael P Persoon

Hanna B Dworkin

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App. 0063

0607



Political Report: July 2010

Introduction | The REDistricting MAjority Project (REDMAP) is a program of the Republican State Leadership Committee (RSLC) dedicated to winning Republican control of state legislatures that will have the most impact on Congressional redistricting in 2011. This inaugural REDMAP report is intended to more fully explain how the RSLC views a path to success in the 2010 state legislative races, how that will impact policy-making on a state level and examine what it means for long-term Congressional redistricting. This report, and its outlook, assumes that REDMAP is fully funded, an assumption that is consistent with the current state of fundraising.

The Landscape | This edition of the REDMAP Political Report includes two key findings:

1. That Democrats will not take control of a single state legislative chamber in the country this year, including key REDMAP chambers such as the Texas House, Michigan Senate and Tennessee House; and
2. That, as of today, Republicans will pick up four chambers with 12 additional Democrat controlled chambers in key REDMAP states solidly in play.

The bottom line, as of July, is that if Republicans win only half of those remaining 12 legislative chambers in play, the result will be a net gain of 10 legislative chambers.

Legislative Impact | Voters are looking for legislative policies to sufficiently address the hardships they are facing on a day-to-day basis. At the same time, voters, including large blocs of Independents are weary of the Democrats' over reaching approach on taxes, spending, healthcare and a myriad of other issues. Surveys continue to demonstrate they are more inclined to support Republican policies on these issues. The result of these switches of party control with new Republican Speakers, Majority Leaders and other legislative leaders will be a move towards smaller government, lower taxes and protection from Democrat over-reach.

Historical Context | This year will not be a typical election cycle in terms of shift in partisan control. As of today, it appears that 2010 will be more successful for Republicans than 1982 was for the Democrats and could even rival the Republican successes seen on the state level in 1994. The year, for either party, which is viewed as most successful, would be 1974 when, in the wake of Watergate, Democrats gained a net of 21 chambers. In raw numbers, Democrats gained a net of nine chambers in 1982, while Republicans gained a net 19 chambers in 1994. The Democrat's performance in 2006, when they gained a net of eight chambers, simply will not compare to 2010.

App. 0064

0608



State of the States |

GOP Picks up Four Chambers (As of July 29, 2010)

Indiana House

NEED FOR REPUBLICAN CONTROL

3

SEATS IN PLAY

Open Seats: 2(D)

Democrat Incumbents: 11

Total: 13

INSIDER TIPS

GOP lost 3 seats by fewer than 500 votes in '08

Ohio House

NEED FOR REPUBLICAN CONTROL

4

SEATS IN PLAY

Democrat Incumbents: 20

Total: 20

INSIDER TIPS

*GOP candidates have COH advantage in 4 Dem held seats;
GOP lost 3 targeted seats in '08 by fewer than 1,000 votes; John Kasich is leading in all ten of the most
vulnerable Democrat incumbent districts*

Pennsylvania House

NEED FOR REPUBLICAN CONTROL

3

SEATS IN PLAY

Open Seats: 5 (D)

Democrat Incumbents: 15

Total: 20

INSIDER TIPS

GOP lost 6 targeted seats by 900 or fewer votes in '08

Wisconsin Senate

NEED FOR REPUBLICAN CONTROL

2

SEATS IN PLAY

Open Seats: 1(R)

Democrat Incumbents: 5

Total: 6

INSIDER TIPS

3 targeted Dem seats that were carried by GOP AG in '06

State of the States |

12 Democrat Controlled Chambers in Play (As of July 29, 2010)

Alabama House

NEED FOR REPUBLICAN CONTROL

8

SEATS IN PLAY

Open Seats: 4(D)

Democrat Incumbents: 9

Total: 13

INSIDER TIPS

GOP lost 4 seats by fewer than 400 votes in '08

Alabama Senate

NEED FOR REPUBLICAN CONTROL

3

SEATS IN PLAY

Open Seats: 1(R), 2(D)

Democrat Incumbents: 7

Republican Incumbents: 2

Total: 12

INSIDER TIPS

GOP lost 2 seats by fewer than 512 votes in '08

Colorado House

NEED FOR REPUBLICAN CONTROL

6

SEATS IN PLAY

Open Seats: 1(R), 2(D)

Democrat Incumbents: 8

Total: 11

INSIDER TIPS

GOP within the margin or leading in 3 Dem held seats in early polling

Colorado Senate

NEED FOR REPUBLICAN CONTROL

4

SEATS IN PLAY

Open Seats: 1(R), 2 (D)

Democrat Incumbents: 4

Total: 7

INSIDER TIPS

GOP leading or tied in 3 Dem held seats in early polling

Iowa House

NEED FOR REPUBLICAN CONTROL

7

SEATS IN PLAY

Open Seats: 6(R), 7(D)
Democrat Incumbents: 17
Republican Incumbents: 5
Total: 35

INSIDER TIPS

Republican Caucus outraised Democrat Caucus by a 2 to 1 margin; House Democrat Majority Leader only reported \$13,000 on hand in July

Iowa Senate

NEED FOR REPUBLICAN CONTROL

8

SEATS IN PLAY

Open Seats: 2(D)
Democrat Incumbents: 10
Total: 12

Michigan House

NEED FOR REPUBLICAN CONTROL

13

SEATS IN PLAY

Open Seats: 6(R), 11(D)
Democrat Incumbents: 13
Republican Incumbents: 3
Total: 33

INSIDER TIPS

9 targeted Dem seats were part of '08 Obama wave – had previously been in GOP hands since '02

New York Senate

NEED FOR REPUBLICAN CONTROL

2

SEATS IN PLAY

Open Seats: 1(R)
Democrat Incumbents: 5
Total: 6

North Carolina House

NEED FOR REPUBLICAN CONTROL
9

SEATS IN PLAY
Open Seats: 3(D)
Democrat Incumbents: 15
Total: 18

INSIDER TIPS
GOP leading in 7 Dem held seats in public polling

North Carolina Senate

NEED FOR REPUBLICAN CONTROL
6

SEATS IN PLAY
Open Seats: 4 (D)
Democrat Incumbents: 8
Total: 12

INSIDER TIPS
GOP leads in 7 Dem held seats in public polling

Oregon Senate

NEED FOR REPUBLICAN CONTROL
4

SEATS IN PLAY
Open Seats: 2(D)
Democrat Incumbents: 5
Total: 7

INSIDER TIPS
GOP has lead, trails by single digits in polling for 4 top tier races

Wisconsin House

NEED FOR REPUBLICAN CONTROL
4

SEATS IN PLAY
Open Seats: 3(D/I)
Democrat Incumbents: 16
Total: 19

INSIDER TIPS
GOP lost 4 seats by 722 or fewer votes in '08

Impact on Congressional Redistricting If and when Republicans are successful in the races addressed in this report, the Republican Party will have an impact on the redrawing of numerous Congressional districts across the country, an effect that will be felt for the next decade. Republicans have an opportunity to create 20-25 new Republican Congressional Districts through the redistricting process over the next five election cycles, solidifying a Republican House majority. In fact, 33 of the 75 most competitive congressional districts, as identified in National Public Radio's June report, are located in REDMAP target states this year. If REDMAP achieves its goals, nearly half of the traditionally swing districts will be redrawn by Republicans before the 2012 election cycle. The remaining seats will either be subject to Democrat control or part of a partisan-neutral redistricting process.

Chamber	Congressional Impact	Notes
Indiana House	Up to 2 New GOP Districts	Requires Senate hold, switch House
Ohio House	Up to 5 New GOP Districts	Requires Senate hold, House switch, GOP Governor
Pennsylvania House	Up to 4 New GOP Districts	Requires Senate hold, House switch, GOP Governor
Wisconsin Senate	Neutralize Dem Advantage	Requires both chambers to switch, and GOP Governor
Alabama House	1 New GOP District	Requires both chambers to switch and GOP Governor
Alabama Senate		
Colorado House	1 New GOP District	Requires both chambers to switch and GOP Governor
Colorado Senate		
Iowa House	Neutralize Redistricting Process	Legislature can override bi-partisan commission
Iowa Senate		
Michigan House	Up to 3 New GOP Districts	Requires Senate hold, House switch, GOP Governor
New York Senate	Neutralize Dem Advantage	
North Carolina House	Neutralize Dem Advantage	
North Carolina Senate		
Oregon Senate	Neutralize Dem Advantage	
Wisconsin House	1 New GOP District	Requires both chambers to switch, GOP Governor

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Dear Legislative Leaders:

As you well know, the decennial process of redistricting is underway in most states across the country. Some states have already concluded their redistricting processes and others have yet to begin. The RSLC continues to play an important role in gaining and keeping Republican majorities around the country and we are pleased that we now control 56 legislative chambers. We know the ongoing redistricting process will impact the legislative lines that we will have to defend in 2012 and beyond. Therefore, we have taken the initiative to retain a team of seasoned redistricting experts that we will make available to you at no cost to your caucus for assistance. We urge you to use them as a key resource for technical advice as you undergo this process.

Already, we are engaged in a number of states and believe we are playing a meaningful role in helping draw fair and legal lines that will allow us to run competitive elections in 2012 and in future cycles. Our team would be happy to assist in drawing proposed maps, interpreting data, or providing advice. Their practical solutions have been used through many decades of redistricting and their best practices help ensure that lines drawn take Voting Rights Act issues and statutory mandates into consideration. Our team can also provide strategic advice in cases of litigation as well.

Our redistricting team is led by Tom Hofeller. You can contact him at tom@rnchq.com or at _____.

The entirety of this effort will be paid for using non-federal dollars through our 501c4 organization, the State Government Leadership Foundation (SGLF). For more information about this effort, you can contact me at (571) 480-4860 or contact Tom directly. None of these resources will take away from our ability to help fund future state elections through the RSLC.

We appreciate the complexities of redistricting and hope that you will consider using our veteran team when crafting new legislative and Congressional boundaries during this critical time.

Sincerely,

Chris Jankowski
President & Chief Executive Officer

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