
In the Supreme Court of Pennsylvania

Middle District

No. 159 MM 2017

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA *et al.*,

Petitioners,

v.

THE COMMONWEALTH OF PENNSYLVANIA *et al.*,

Respondents.

Review of Recommended Findings of Fact and Conclusions of Law from the
Commonwealth Court No. 261 M.D. 2017

**BRIEF OF RESPONDENTS MICHAEL C. TURZAI, IN HIS OFFICIAL
CAPACITY AS SPEAKER OF THE PENNSYLVANIA HOUSE OF
REPRESENTATIVES, AND JOSEPH B. SCARNATI, III, IN HIS
OFFICIAL CAPACITY AS PENNSYLVANIA SENATE PRESIDENT PRO
TEMPORE IN SUPPORT OF PROPOSED REMEDIAL
CONGRESSIONAL DISTRICTING MAP**

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Legislative Respondents Michael C. Turzai and Joseph B. Scarnati, III submit a proposed Congressional district map to this Court pursuant to the Court’s January 22, 2018 Order (the “Order”). This proposed district map is not legislation passed by the House or Senate; the Court’s very short deadline and delay in issuing its opinion, coupled with the Commonwealth’s constitutional legislative process, afforded the General Assembly inadequate time to do so by February 9, 2018. Nonetheless, this proposed map has been submitted this day to the Governor. A copy of the proposed map is attached as **Attachment A**.

This submission explains the features of Legislative Respondents’ proposed map and how it complies with this Court’s order and opinion.¹

I. BACKGROUND OF LITIGATION AND THE 2011 PLAN

To begin, the 2011 Congressional Plan (the “2011 Plan”), which this Court struck down, was a bipartisan plan that complied with Pennsylvania law at the time of its enactment. The basic facts underlying its enactment demonstrate that the 2011 Plan was not a partisan effort to diminish the value of anyone’s vote.

In 2011, Pennsylvania conducted its decennial redistricting process. In May and June 2011, the House and Senate Government Committees held public

¹ Legislative Respondents are entitled as parties to the case to submit a proposed remedial plan on or before February 15, 2018. Legislative Respondents reserve the right to supplement or modify this submission or its attendant documents.

hearings throughout the Commonwealth to hear Pennsylvanians' views about the impending redistricting effort. (Joint Stipulation of Facts ("JS") at ¶ 38).

The General Assembly then went to work. All four caucuses of the General Assembly were provided identical data to evaluate and draw their own maps. (Petr. Ex. 178 at 40:17-25, 49:13-50:3). On September 14, 2011, a draft redistricting plan, Senate Bill 1249 ("SB 1249") was introduced in the Pennsylvania Senate. (JS ¶ 39).

Between September 14, 2011, and December 14, 2011, the Senate deliberated over SB 1249. (JS ¶¶ 39-50). During these three months of deliberations, maps were considered in the Senate State Government and Appropriations Committees. (JS ¶¶ 45-47).

The Senate's first consideration of SB 1249 took place on December 7, 2011. (JS ¶ 41). The Senate's second consideration of SB 1249 took place on December 12, 2011. (JS ¶ 43). SB 1249 was amended thereafter on December 14, 2011 in the Senate State Government Committee. (JS ¶ 45).

On December 14, 2011, the Senate State Government Committee voted to report SB 1249 out of committee. (*See* Petr. Ex. 178 at 60:9-61:7). A Democratic Senator, Tina Tartaglione, provided the decisive vote to allow the legislation to proceed, (Petr. Ex. 178 at 61:8-16), and did so to "help" Philadelphia's Democratic Congressional delegation, incumbent Democratic Reps. Bob Brady

and Chaka Fattah. (*Id.* at 62:9-63:4). Without Sen. Tartaglione’s support, SB 1249 could not have advanced. (*Id.* at 63:5-7). That same day the Pennsylvania Senate passed SB 1249 by a vote of 26-24. (JS ¶ 50).

On December 14, 2011, SB 1249 was sent to the House. (JS ¶ 52). Over the next six days, the House deliberated over SB 1249. (JS ¶¶ 52-55). The House voted to pass SB 1249 on December 20, 2011 with 136 Members voting in favor. (JS ¶ 57). Critically, 36 of the 136 “yes” votes were cast by Democratic Members. (*Id.* ¶ 58; *Petrs. Ex. 179* at 47:10-12, 50:3-8, 106:4-107:23). This significant bipartisan support for SB 1249 belies the notion that Republicans intentionally constructed SB 1249 to harm Democratic voters. It also demonstrates that Democrats had real leverage in the negotiations, because there were not enough Republican “yes” votes to pass SB 1249 without Democratic support. (*See id.*).

On December 22, 2011, the Senate signed SB 1249 after it passed in the House. Governor Tom Corbett then signed it into law. (JS ¶ 60). When SB 1249 was enacted into law, it became the 2011 Plan. (JS ¶ 61).

Equally important is the fact that the 2011 Plan complied with Pennsylvania law at the time of its enactment. As the Court effectively conceded in its February 7, 2018 majority opinion, no legal standard articulated as of 2011 was offended in this case. Previously, this Court found that claims that a redistricting plan “constitutes unconstitutional political gerrymandering in violation of the equal

protection guarantee, Pa Const. art. 1 §§ 1 and 26, *and the free and equal elections clause*, Pa. Const. art. 1 § 5,” are “controlled by the *Bandemer* plurality.” *Erfer v. Commonwealth*, 794 A.2d 325, 331-32 (Pa. 2002) (emphasis added). The *Erfer* standard was the one the General Assembly had notice of in 2011, and this Court did not reverse the Commonwealth Court’s finding that the Petitioners did not prove at least two of the elements of that standard. In a meaningful sense, then, the Legislative Respondents prevailed in this case: under the facts presented and the law that governed when the 2011 Plan was enacted, the 2011 Plan is constitutional.

In this case, to find the 2011 Plan constitutional, this Court made a dramatic *change* to the law. *See* Slip Op. at 112-116. The Court’s reliance on the Free and Equal Elections Clause to allow a political gerrymandering claim is inconsistent with decades of precedent. *See id.* at 112. In fact, this Court has rejected this type of claim many times over. First, in *Newbold v. Osser*, 425 Pa. 478, 489, 230 A.2d 54, 60 (1967), the Court held that “there is no basis” in the Court’s decision in *Butcher v. Bloom*, 203 A.2d 556 (Pa. 1964), for a partisan-gerrymandering claim, “nor is there *any other basis* in Pennsylvania’s present Constitution or laws for the proposition that gerrymandering per se, as distinct from departure from explicit constitutional or statutory requirements of compactness or contiguity, may constitute the sole basis upon which a legislative plan of apportionment may be judicially invalidated.” *Id.* (emphasis added). The Free and Equal Elections Clause

was a “basis” in “Pennsylvania’s present Constitution or laws” that did not contain “explicit...requirements of compactness or contiguity,” and *Newbold* “precluded” a political-gerrymandering claim under it.

Similarly, *Erfer* addressed a “dispute,” the “crux” of which was whether a Congressional plan violates “the free and equal elections clause” and held:

[W]e reject Petitioners’ claim that the Pennsylvania Constitution’s free and equal elections clause provides further protection to the right to vote than does the Equal Protection Clause. Petitioners provide us with no persuasive argument as to why we should, at this juncture, interpret our constitution in such a fashion that the right to vote is more expansive than the guarantee found in the federal constitution. *See generally Commonwealth v. Edmunds*, 526 Pa. 374, 586 A.2d 887 (1991).

Erfer, 794 A.2d at 332. The equal-protection “guarantee” *Erfer* referenced was, of course, the *Bandemer* standard, so *Erfer* “precluded” the type of claim the Court has now recognized under the Free and Equal Elections Clause.

II. LEGISLATIVE RESPONDENTS HAVE ATTEMPTED TO COMPLY WITH THE COURT’S ORDER.

By its Order of January 22, 2018, this Court found the 2011 Plan unconstitutional without identifying the manner in which the Plan violated the Pennsylvania Constitution. The Court also ordered that, if the General Assembly chose to submit a remedial plan, it had to submit such a plan to the Governor for consideration by February 9, 2018—18 days after the Court’s Order. The Court also mandated that “[i]f the Governor accepts the General Assembly’s

congressional districting plan, it shall be submitted to this Court on or before February 15, 2018”—only 6 days later.²

However, the Court did not issue an opinion in this case until the afternoon of February 7, 2018, 16 days into the 18-day period.³ Accordingly, the effective time for the General Assembly to pass a remedial plan was cut to two days.

By providing such a compressed timeline, the Court made it impossible for the General Assembly to comply with its Order via legislative enactment. From a constitutional perspective, the Court’s mandated timeline could not be complied with given constitutional requirements for the passage of legislation. Article III of the Pennsylvania Constitution establishes the procedure to pass legislation in the Commonwealth. Pursuant to Article III, Section 2, bills must be referred to a committee, printed and returned therefrom. Pa. Const. art. III, Sec. 2 (“No bill shall be considered unless referred to a committee, printed for the use of the members and returned therefrom.”). Article III, Section 4 mandates that bills be considered on three different days in each chamber. Pa. Const. art. III, Sec. 4 (“Every bill shall

² The limited six-day period afforded to the Governor to consider a remedial map submitted by the General Assembly directly conflicts with the Governor’s authority to veto legislation pursuant to Article IV, Section 15 of the Pennsylvania Constitution. Section 15 guarantees the Governor ten, not six, days to consider whether to veto a bill. Pa. Const. art. IV, Sec. 15.

³ It bears noting that on Wednesday, February 7, 2018, the Office of Administration had closed the Capitol Complex due to inclement weather, resulting in the House and Senate closing.

be considered on three different days in each House.”). Further, Article III Section 5 provides that amendment of a bill by one House must be concurred in by the other, effectively providing that an amendment of a Senate Bill by the House requires the bill return to the Senate for a concurrence vote, or vice versa. Pa. Const. art. III, Sec. 5 (“No amendment to bills by one House shall be concurred in by the other, except by the vote of a majority of the members elected thereto”). Additionally, Article III Section 8 mandates the signing of bills in each chamber. Pa. Const. art. III, Sec. 8.

Compliance with each of these Constitutional provisions takes time, but such compliance is mandated by our Constitution. In conflict with these Constitutional provisions, the Court has elevated its own will over these Constitutional mandates for the passage of legislation, and has put the General Assembly in a position where its compliance with the Constitution and compliance with the Court’s timeline are mutually exclusive.

From a practical perspective, the Court’s Order simply does not provide sufficient time for the General Assembly to create a remedial map and pass the appropriate legislation. The passage of legislation takes a great deal of time given the steps outlined above. Once the legislation is agreed to in principle, it would need to be sent to the Legislative Data Processing Center (“LDPC”) to be translated into legal descriptions of the Congressional districts and then proofread

for accuracy. Thereafter, the Pennsylvania Legislative Reference Bureau (“LRB”) would need to translate the legislation into bill format. In short, the drawing of the map is only one phase of the redistricting process, which takes time to accomplish correctly and accurately. The General Assembly at this point has had only two days to do its work with the benefit of the Court’s Majority Opinion.

Despite the unworkable, inadequate, and potentially unconstitutional timeline imposed by the Court, and despite the absence of a Majority Opinion until the 16th day of the 18-day period, the General Assembly has taken what steps it could to comply with the Court’s Order. After a week from the January 22, 2018 Order without an Opinion, Senate President Pro Tempore Scarnati and Senate Majority Leader Corman introduced Senate Bill 1034, Printer’s Number 1441. A “shell” bill, SB 1034 repealed the currently duly enacted Congressional Districts, but did not contain the legal descriptions of the proposed new districts given that the full guidance from the Court had yet to be issued. The bill was approved unanimously in the Senate and reported from the House State Government Committee in similar unanimous fashion. Without the additional direction from the Court in its Majority Opinion until the evening of February 7, 2018, the House and Senate and their staff worked to meet the Court’s timeline to submit a new map by February 9, 2018.

The proposed map reflects the product of that effort.

III. THE PROPOSED MAP'S MATHEMATICAL ACHIEVEMENTS

As the Court and public are aware, the world is not divided neatly into “Democrats” and “Republicans,” and Democrats and Republicans are not evenly geographically distributed across the Commonwealth following county and municipal lines. It is equally clear that Pennsylvania’s political subdivisions are often not compact according to the various mathematical measures of compactness. With that said, Legislative Respondents’ proposed map clearly satisfies the requirements set forth in the Court’s January 22, 2018 Order.

A. Splits

The proposed map minimizes split counties and county segments, and minimizes the number of split political subdivisions. The 2011 Plan split 28 counties into at least two districts, including one county split into five districts, two counties split into four districts, and three counties split into three districts. By contrast, the proposed map splits only 15 counties, with eleven split twice, three split three times, and one split four times. No counties are split five times.

The 2011 Plan split 68 municipalities into at least two districts. The proposed map splits only 17 municipalities. The only municipality split more than twice is the City of Philadelphia, and that is because mathematically it absolutely must be split into three districts. This compares favorably to the 1992 map drawn by this Court in *Mellow v. Mitchell*, 607 A.2d 204 (Pa. 1992). While that map did

not meet the absolute equality of population now required (that map had a range of 63 people, far greater than the 19-person range struck down *Vieth v. Com.*, 188 F. Supp. 2d 532 (M.D. Pa. 2002)), that map split 19 counties and 14 municipalities. By contrast, Legislative Respondents' proposed map splits only 15 counties and 17 municipalities. This proposed map, for population equality purposes, splits only one precinct per municipality for a total of 17, and represents a significant reduction from the 27 precincts split in the 2002 map and the 19 precincts split in the 2011 Plan.

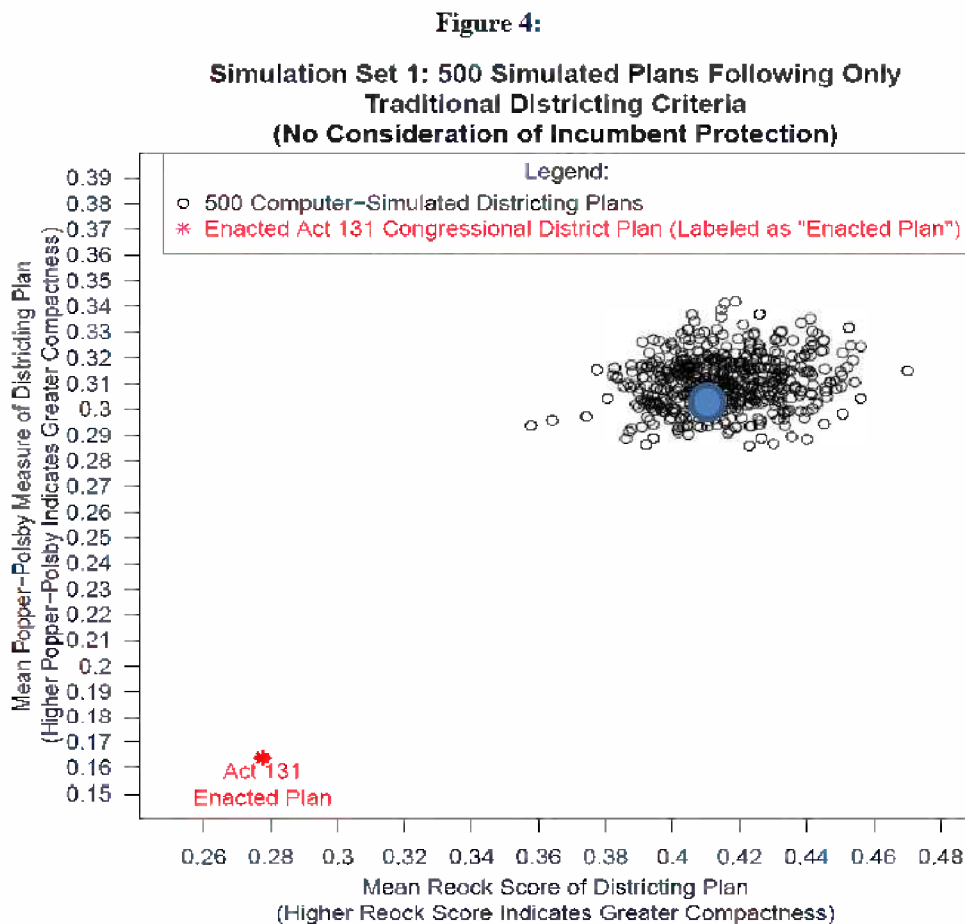
These statistics compare favorably to the maps produced by Dr. Chen's "Set One" simulations. As the Court found, Dr. Chen's "Set One" simulations—those computer simulations that did not consider incumbency protection—split between 11 and 16 counties. Slip op. at 41. The 15 county splits in the proposed map fit within that range. Similarly, Dr. Chen's "Set One" simulations split 40 to 58 municipalities. *Id.* The proposed map splits only 17—far less than Dr. Chen's.

A detailed splits report is attached hereto as **Attachment B**.⁴

⁴ Legislative Respondents will submit to the Court the ESRI shapefiles and the block equivalency files required by the Court's Order upon receipt of submission instructions from the Court on its preferred method of submission, *i.e.* via e-mail or USB drive to be delivered in person to the Prothonotary's office.

B. Compactness

In addition, this map's measures of compactness on the Reock and Polsby-Popper scales fall well within the ranges of Dr. Chen's "Set One" simulations. To illustrate this, below is a reproduction of Figure 4 from Dr. Chen's Report—a scatterplot of the compactness scores produced by his "Set One" simulations. Legislative Respondents have superimposed a blue oval on that map detailing where their proposed map's compactness scores fit on that diagram:



A detailed compactness report is attached hereto as **Attachment C**.

C. Population Requirements, Federal Law, and Other Traditional Districting Criteria

In compliance with federal law with respect to population deviations, no district is over or underpopulated by more than one person. Finally, the map complies with the Voting Rights Act and the concerns recently expressed by the NAACP, and the First and Second Districts in this map are substantially similar in racial composition to the 2011 Plan's First and Second Congressional districts. This was necessary as a matter of law to minimize the risk to the Commonwealth of a racial gerrymandering claim under the 14th Amendment or the Voting Rights Act. It is critical at this stage to minimize risk given the closeness in time to the primary elections that this map is set to be implemented.

	2011 District 1	Proposed District 1	2011 District 2	Proposed District 2
BVAP	32.63	40.34	56.77	53.32
HVAP	13.21	5.62	4.80	13.96
AVAP	6.48	7.80	5.12	4.33
NHWP	46.91	44.86	32.00	27.75

The map also has the additional feature of not pairing any incumbent member of Congress of either party seeking re-election in 2018 with any other incumbent member of Congress. But in no way was this feature of the map subordinated to traditional districting principles as divined by this Court's orders. Additionally, in order to avoid confusion among the general public, this map retains 68.8% of the populations of existing districts in the same districts, which will help to reduce overall voter confusion. This retention is nearly the same for districts represented by both Republican (68.3%) and Democratic (69.8%) Members of Congress.

IV. RESERVATION OF RIGHTS

In addition to confirming that participation in this remedial scheme does not amount to acquiescence with the legal principles the Court invented in this case, Legislative Respondents also reserve the right, without limitation, to:

1. Appeal any aspect of the Court's ruling as provided by law;
2. Object to any map proposed for adoption before this Court;
3. File or endorse a court action against any map this Court adopts;
4. Pass a new plan to replace any plan the Court adopts;
5. Respond to the Court's ruling through constitutional means, including without limitation the amendment process;

6. Respond to the Court's arrogation of power in violation of the Pennsylvania Constitution and the U.S. Constitution as provided by constitutional processes; or

7. Appeal directly to the public for redress in the various avenues available.

V. CONCLUSION

Legislative Respondents and the General Assembly have worked diligently to attempt to comply with the Court's January 22, 2018 Order. The proposed map submitted hereby complies with the Court's Order in substance, although the lack of adequate time and the late timing of the Court's Majority Opinion prevented the proposed map from being passed as legislation. The Court should nonetheless adopt this proposed map as a compliant map produced by the legislative branch of Pennsylvania's government to whom the task of redistricting has been assigned.

Dated: February 9, 2018

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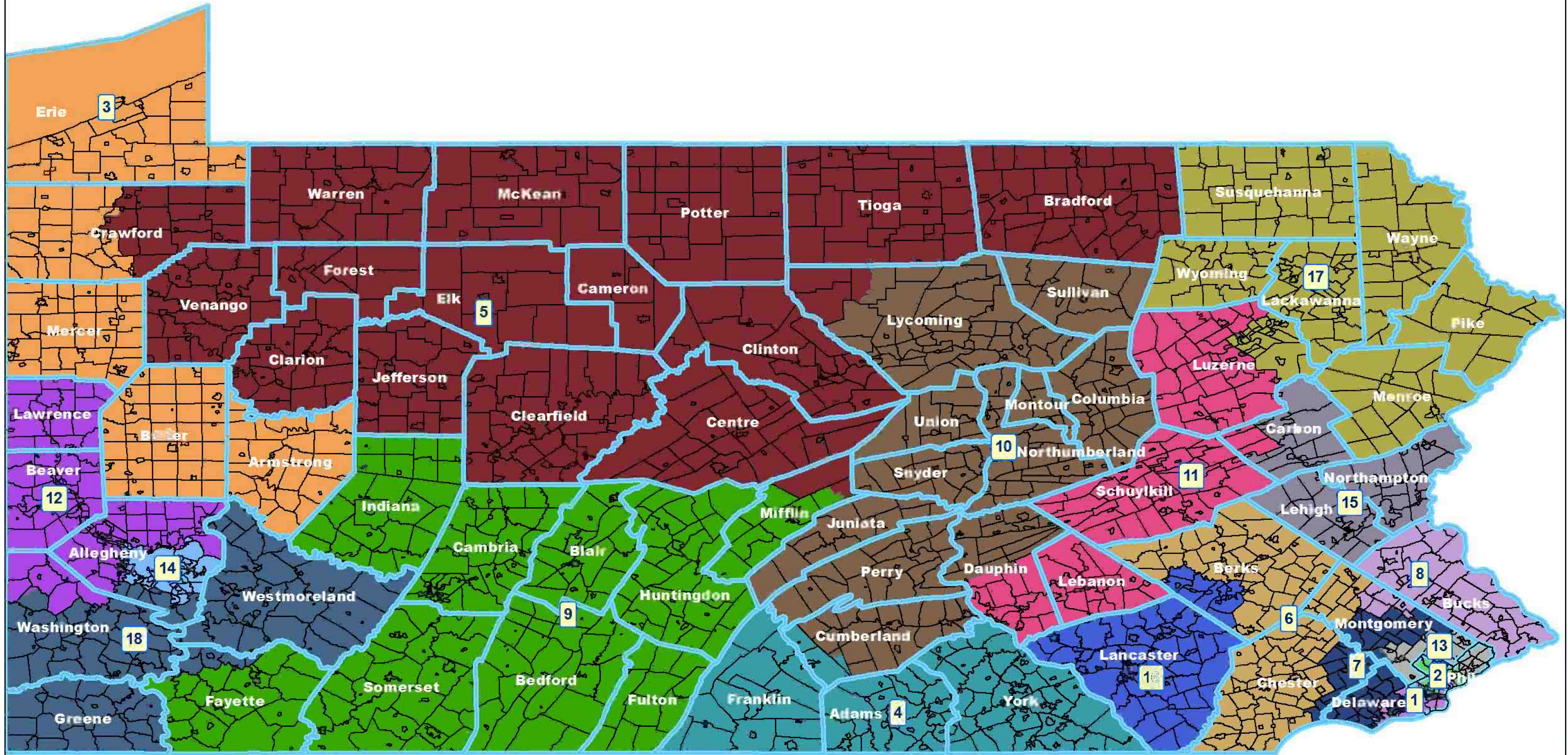
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Joint Submission Plan



ATTACHMENT A

County Splits: 15	
District	County Splits
1	Delaware
	Philadelphia
2	Philadelphia
3	Crawford
4	Cumberland
5	Crawford
	Lycoming
	Mifflin
6	Berks
	Chester
	Montgomery
7	Chester
	Delaware
	Montgomery
8	Fayette
	Montgomery
9	Mifflin
10	Cumberland
	Dauphin
	Lycoming
11	Berks
	Carbon
	Dauphin
	Luzerne
12	Allegheny
	Washington
13	Montgomery
	Philadelphia
14	Allegheny
15	Carbon
16	Berks
17	Luzerne
18	Allegheny
	Fayette
	Washington

		Municipality Split : 17
Districts	County	Municipality Split
1	Delaware	Ridley Twp
	Philadelphia	Philadelphia City
2	Philadelphia	Philadelphia City
3	Crawford	Woodcock Twp
4	Cumberland	South Newton Twp
5	Crawford	Woodcock Twp
	Lycoming	Pine Twp
	Mifflin	Decatur Twp
6	Berks	Bethel Twp
	Berks	Womelsdorf
	Chester	Phoenixville
7	Chester	Phoenixville
	Delaware	Ridley Twp
	Montgomery	Towamencin Twp
	Montgomery	Upper Merion Twp
8	Montgomery	Towamencin Twp
9	Fayette	Luzerne Twp
	Mifflin	Decatur Twp
10	Cumberland	South Newton Twp
	Dauphin	Middle Paxton Twp
	Lycoming	Pine Twp
11	Berks	Bethel Twp
	Carbon	Lansford
	Dauphin	Middle Paxton Twp
	Luzerne	Wilkes-Barre City
12	Allegheny	Scott Twp
	Washington	Cross Creek Twp
13	Montgomery	Upper Merion Twp
	Philadelphia	Philadelphia City
14	Allegheny	Scott Twp
15	Carbon	Lansford
16	Berks	Womelsdorf
17	Luzerne	Wilkes-Barre City
18	Fayette	Luzerne Twp
	Washington	Cross Creek Twp

Districts	Voting District Split	Municipality	County
1	WD 06 PCT 01	Ridley Twp	Delaware
2	WD 62 PCT 02	Philadelphia City	Philadelphia
3	Woodcock Twp	Woodcock Twp	Crawford
4	South Newton Twp	South Newton Twp	Cumberland
5	Woodcock Twp	Woodcock Twp	Crawford
	Pine Twp	Pine Twp	Lycoming
	EAST VTD	Decatur Twp	Mifflin
6	Bethel Twp	Bethel Twp	Berks
	DIST 01	Womelsdorf	Berks
	NORTH WD PCT 03	Phoenixville	Chester
7	NORTH WD PCT 03	Phoenixville	Chester
	WD 06 PCT 01	Ridley Twp	Delaware
	VTD 01 ED 03	Towamencin Twp	Montgomery
	VTD Belmont ED	Upper Merion Twp	Montgomery
8	VTD 01 ED 03	Towamencin Twp	Montgomery
9	DIST 02	Luzerne Twp	Fayette
	EAST VTD	Decatur Twp	Mifflin
10	South Newton Twp	South Newton Twp	Cumberland
	DIST 01	Middle Paxton Twp	Dauphin
	Pine Twp	Pine Twp	Lycoming
11	Bethel Twp	Bethel Twp	Berks
	DIST WEST	Lansford	Carbon
	DIST 01	Middle Paxton Twp	Dauphin
	WD 20	Wilkes-Barre City	Luzerne
12	WD06 DIST 02	Scott Twp	Allegheny
	VTD 01	Cross Creek Twp	Washington
13	VTD Belmont ED	Upper Merion Twp	Montgomery
	WD 62 PCT 02	Philadelphia City	Philadelphia
14	WD06 DIST 02	Scott Twp	Allegheny
15	DIST WEST	Lansford	Carbon
16	DIST 01	Womelsdorf	Berks
17	WD 20	Wilkes-Barre City	Luzerne
18	DIST 02	Luzerne Twp	Fayette
	VTD 01	Cross Creek Twp	Washington

Measures of Compactness

[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]
Table 1.			Inverse		Polsby-	Length-	Population	Population		Min. Convex
Indicator	Reock	Schwartzberg	Schwartzberg	Perimeter	Popper	Width	Polygon	Circle	Ehrenburg	Polygon
Sum	N/A	N/A		4,993.47	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.27	2.29	0.44	N/A	0.18	1.03	0.40	0.24	0.18	0.62
Max	0.56	1.45	0.69	N/A	0.40	118.49	0.92	0.77	0.55	0.84
Mean	0.41	1.79	0.56	N/A	0.30	24.45	0.70	0.45	0.35	0.73
Std. Dev.	0.09	0.25	0.08	N/A	0.08	31.90	0.15	0.17	0.10	0.07
Table 2.			Inverse		Polsby-	Length-	Population	Population		Min. Convex
District	Reock	Schwartzberg	Schwartzberg	Perimeter	Popper	Width	Polygon	Circle	Ehrenburg	Polygon
1	0.30	2.29	0.44	78.94	0.18	4.79	0.71	0.54	0.38	0.69
2	0.56	1.61	0.62	44.18	0.39	1.03	0.78	0.65	0.38	0.74
3	0.28	1.86	0.54	485.19	0.23	69.49	0.71	0.46	0.25	0.62
4	0.30	1.58	0.63	283.10	0.36	59.39	0.83	0.52	0.31	0.82
5	0.37	1.62	0.62	670.30	0.36	118.49	0.76	0.41	0.44	0.83
6	0.42	1.87	0.53	274.89	0.25	12.02	0.58	0.35	0.25	0.63
7	0.39	2.25	0.44	170.57	0.19	2.79	0.51	0.24	0.28	0.68
8	0.44	1.53	0.65	147.51	0.40	1.63	0.69	0.31	0.40	0.78
9	0.37	1.66	0.60	500.46	0.33	56.57	0.67	0.27	0.48	0.78
10	0.43	1.54	0.65	402.09	0.39	28.99	0.74	0.25	0.34	0.80
11	0.27	2.00	0.50	343.14	0.23	27.24	0.70	0.26	0.18	0.65
12	0.43	1.94	0.52	274.02	0.24	17.77	0.46	0.40	0.23	0.70
13	0.41	1.94	0.52	89.76	0.26	7.94	0.55	0.35	0.26	0.70
14	0.41	1.95	0.51	106.66	0.23	6.45	0.83	0.64	0.50	0.71
15	0.52	1.66	0.60	201.72	0.32	5.17	0.90	0.77	0.39	0.73
16	0.53	1.47	0.68	195.59	0.37	3.73	0.92	0.61	0.55	0.82
17	0.56	1.45	0.69	346.20	0.40	1.04	0.88	0.72	0.38	0.84
18	0.35	1.96	0.51	379.14	0.21	15.56	0.40	0.32	0.25	0.69