

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Carol Ann Carter; Monica Parrilla;
Rebecca Poyourow; William Tung;
Roseanne Milazzo; Burt Siegel;
Susan Cassanelli; Lee Cassanelli;
Lynn Wachman; Michael Guttman;
Maya Fonkeu; Brady Hill; Mary
Ellen Balchunis; Tom DeWall,
Stephanie McNulty and Janet
Temin,

Petitioners,

v.

Veronica Degraffenreid, in her
official capacity as the Acting
Secretary of the Commonwealth of
Pennsylvania; Jessica Mathis, in
her official capacity as Director for
the Pennsylvania Bureau of
Election Services and Notaries,

Respondents,

Phillip T. Gressman; Ron Y.
Donagi; Kristopher R. Tapp;
Pamela Gorkin; David P. Marsh;
James L. Rosenberger; Amy
Myers; Eugene Boman; Gary
Gordon; Liz McMahon; Timothy G.
Freeman; and Garth Isaak,

Petitioners,

v.

CASES CONSOLIDATED

No. 464 M.D. 2021

No. 465 M.D. 2021

**AMICUS PARTICIPANTS’
 (“CITIZEN-VOTERS”) PROPOSED
 REMEDIAL MAP OF
 CONGRESSIONAL DISTRICTS**

Counsel of Record for Amicus
Participants (“Citizen-Voters”):

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Coulter & Graham L.L.P.

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Election Services and Notaries,

Respondents,

Leslie Osche, Kim Geyer, Michael
T. Slupe, Candee Barnes, Thomas
Reep, Brandy Reep, Kenneth
Lunsford, Tammy Lunsford, James
Thompson, Pamela Thompson,
Joseph Renwick, Stephanie
Renwick, Louis Capozzi, David
Ball, Mary E. Owlett, Kristine Eng,
Justin Behrens, James P.
Foreman, Matthew J. Stuckey,
Anthony J. Luther, Linda C.
Daniels, Jeffrey Piccola, James
Vasilko, Jay Hagerman, and Evan
P. Smith,

Amicus Participants,

v.

Veronica Degraffenreid, in her
official capacity as the Acting
Secretary of the Commonwealth of
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her official capacity as Director for
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Respondents.

**AMICUS PARTICIPANTS' ("CITIZEN-VOTERS") PROPOSED MAP OF
CONGRESSIONAL DISTRICTS**

Amicus Participants ("Citizen-Voters"), by and through their undersigned counsel, respectfully submit a proposed Congressional Redistricting Map pursuant to Paragraph 6 of the Commonwealth Court's Order dated January 14, 2022.

Paragraph 6 of the Court's January 14, 2022 Order provides,

Amicus Participants who wish to submit for the Court's consideration one (1) proposed 17-district congressional redistricting map/plan that is consistent with the results of the 2020 Census shall file the proposed map/plan and, if the Amicus Participant chooses to do so, a supporting brief and/or a supporting expert report, by 5:00 p.m. on Monday, January 24, 2022.

The proposed Congressional Redistricting Map submitted by the Citizen-Voters restores the following counties which were split by Pennsylvania's 2018 Congressional District Map: Washington, Cambria, Butler, and Centre. The proposed map endeavors to maintain communities of interest in one congressional district. For example, the Citizen Voters' proposed Map includes the City of Pittsburgh and the South Hills of Allegheny County in one district in District 17. In drafting the Citizen Voters' proposed map, efforts were taken to ensure that the proposed map split fewer municipalities than Pennsylvania's 2018 Congressional District Map, with fewer than sixteen (16) municipalities split by the Citizen Voters' Map as

compared to the nineteen (19) municipalities split by Pennsylvania's 2018 Map. Further, the Citizen Voters' Map splits fewer than One Hundred and Nine (109) school districts as compared to the One Hundred and Twenty-Four (124) school districts split by Pennsylvania's 2018 Congressional District Map.

Citizen Voters' proposed Map only splits Fourteen (14) Counties with three (3) Counties splitting into three congressional districts, and eleven (11) Counties split into two congressional districts. A list of Counties that have been split and the districts which comprise these Counties are as follows:

- Adams – 10th and 12th Congressional Districts
- Allegheny – 16th and 17th Congressional Districts
- Berks – 4th, 6th, and 11th Congressional Districts
- Chester – 5th and 6th Congressional Districts
- Clarion – 14th and 15th Congressional Districts
- Dauphin – 9th and 10th Congressional Districts
- Huntingdon – 12th and 14th Congressional Districts
- Luzerne – 8th and 9th Congressional Districts
- Mercer – 15th and 16th Congressional Districts
- Monroe – 7th and 8th Congressional Districts
- Montgomery – 1st, 4th, and 5th Congressional Districts
- Philadelphia – 2nd, 3rd, and 5th Congressional Districts
- Schuylkill – 9th and 11th Congressional Districts
- Somerset – 12th and 13th Congressional Districts

The Citizen-Voters Amicus Participants have utilized the Legislative Redistricting Commission's 2021 Data Set #1 (Without Prisoner Reallocation) (2020 Census Data).

The following Exhibits are attached hereto:

- A. Exhibit A – Statewide map of proposed Congressional Districts;
- B. Exhibit B – Citizen Voters' Map Compactness Spreadsheet;
- C. Exhibit C – Pennsylvania's 2018 Congressional Map Compactness Spreadsheet; and
- D. Exhibit D – Comparison of County Splits of Citizen Voters' Map and Pennsylvania's 2018 Congressional District Map.
- E. Exhibit E – Map Showing County Splits in Citizen Voters' proposed Map.

The Citizen-Voter Amicus Participants would be happy to respond to any questions the Court may have concerning the Citizen-Voters' proposed map of congressional districts.

STATEMENT OF INTEREST PURSUANT TO Pa. R.A.P. 531

Pursuant to Pa. R.A.P. Section 531, the Participants in this Amicus Brief are the Applicants in the "Citizen-Voters" Application to Intervene. All of said individuals support the premises set forth in the Petition and support the Map and position submitted herewith. Counsel for the Amici in this matter are compensated by the Republican Federal Committee of Pennsylvania

(PAC) and were assisted in the preparation of the Map submitted herewith in part by said entity.

Respectfully submitted,

**DILLON, McCANDLESS, KING,
COULTER & GRAHAM, L.L.P.**

By: /s/ Thomas W. King, III
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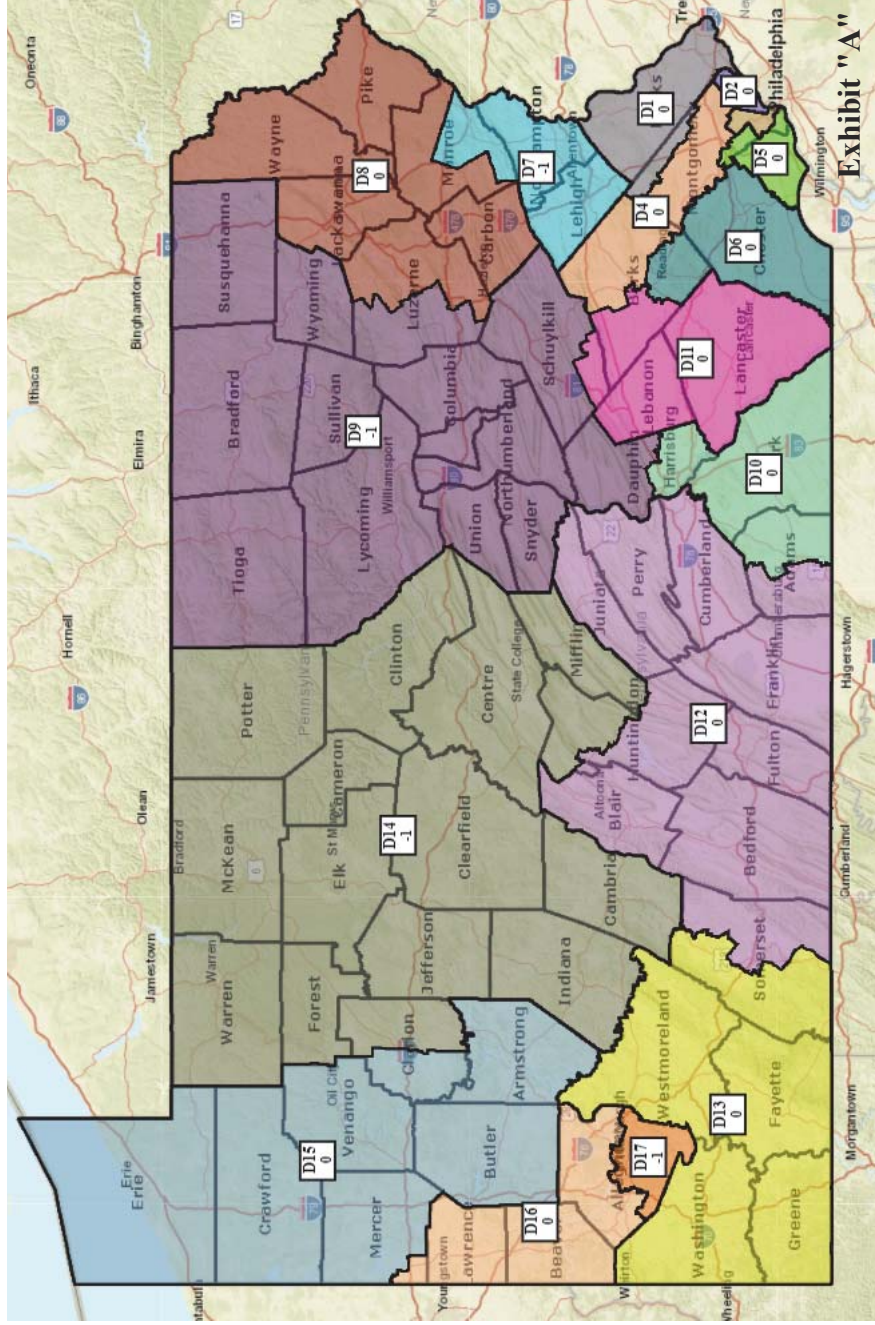


Exhibit "A"

Citizen Voters Map Compactness

District	Polygon Area		Area/Convex					Holes
	(sq. mi)	Perimeter (mi)	Reock	Hull	Grofman	Schwartzberg	Polsby Popper	
Map Average	2713.91	262.2064706	0.440588235	0.792352941	6.071764706	1.713529412	0.349411765	0
Unassigned	0	0	0	0	0	0	0	0
D1	714.64	147.09	0.4	0.81	5.5	1.55	0.42	0
D2	67.67	43.59	0.34	0.85	5.3	1.5	0.45	0
D3	55.9	44.44	0.37	0.72	5.94	1.68	0.36	0
D4	792.54	206.16	0.25	0.78	7.32	2.07	0.23	0
D5	250.46	100.98	0.46	0.77	6.38	1.8	0.31	0
D6	938.74	199.12	0.45	0.76	6.5	1.83	0.3	0
D7	931.86	162.77	0.44	0.77	5.33	1.5	0.44	0
D8	3090.66	336.09	0.49	0.78	6.05	1.71	0.34	0
D9	8504.12	525.93	0.52	0.81	5.7	1.61	0.39	0
D10	1375.91	231.11	0.48	0.81	6.23	1.76	0.32	0
D11	1687.68	230.58	0.54	0.85	5.61	1.58	0.4	0
D12	5521.06	469.65	0.42	0.81	6.32	1.78	0.31	0
D13	3856.32	390.95	0.54	0.8	6.3	1.78	0.32	0
D14	11132.85	591.31	0.62	0.85	5.6	1.58	0.4	0
D15	5624.49	418	0.37	0.83	5.57	1.57	0.4	0
D16	1294.75	241.73	0.34	0.7	6.72	1.9	0.28	0
D17	296.82	118.01	0.46	0.77	6.85	1.93	0.27	0

Supreme Court-approved 2018 Map

District	Polygon Area	Perimeter (mi)	Reock	Area/Convex	Grofman	Schwartzberg	Polsby Popper	Holes
AVERAGE	2564.501667	267.0094444	0.458888889	0.791666667	6.247222222	1.762222222	0.335	0
Unassigned	0	0	0	0	0	0	0	0
D1	656.72	134.58	0.43	0.83	5.25	1.48	0.46	0
D2	66.1	42.06	0.37	0.86	5.17	1.46	0.47	0
D3	54.64	43.64	0.43	0.74	5.9	1.67	0.36	0
D4	481.95	138.74	0.41	0.81	6.32	1.78	0.31	0
D5	222.11	85.18	0.44	0.84	5.72	1.61	0.38	0
D6	924.01	198.28	0.45	0.72	6.52	1.84	0.3	0
D7	868.81	160.62	0.41	0.83	5.45	1.54	0.42	0
D8	2732.12	349.78	0.49	0.75	6.69	1.89	0.28	0
D9	3331.74	410.38	0.55	0.74	7.11	2.01	0.25	0
D10	1119.73	218.55	0.49	0.76	6.53	1.84	0.29	0
D11	1546.29	228.85	0.45	0.88	5.82	1.64	0.37	0
D12	10075.83	673.95	0.43	0.79	6.71	1.89	0.28	0
D13	6039.89	540.78	0.41	0.79	6.96	1.96	0.26	0
D14	2860.92	328.28	0.54	0.77	6.14	1.73	0.33	0
D15	9855.16	541.96	0.67	0.86	5.46	1.54	0.42	0
D16	4124.37	366.52	0.32	0.8	5.71	1.61	0.39	0
D17	900.08	199.43	0.51	0.76	6.65	1.88	0.28	0
D18	300.56	144.59	0.46	0.72	8.34	2.35	0.18	0

County Splits

2018 Court Enacted Map

Split Count:	13
Segment Count:	30
Segment List:	
Allegheny County	17,18
Berks County	4,6,9
Butler County	15,16,17
Cambria County	13,15
Centre County	12,15
Cumberland County	10,13
Luzerne County	8,9
Monroe County	7,8
Montgomery County	1,4,5
Northumberland County	9,12
Philadelphia County	2,3,5
Westmoreland County	13,14
York County	10,11

Citizen Voters

Split Count:	14
Segment Count:	31
Segment List:	
Adams County	10,12
Allegheny County	16,17
Berks County	4,6,11
Chester County	5,6
Clarion County	14,15
Dauphin County	9,10
Huntingdon County	12,14
Luzerne County	8,9
Mercer County	15,16
Monroe County	7,8
Montgomery County	1,4,5
Philadelphia County	2,3,5
Schuylkill County	9,11
Somerset County	12,13

Municipality Splits

2018 Court Enacted Map

Split Count:	19
Segment Count:	39
Segment List:	Birmingham township 5,6
	Cranberry township 16,17
	District township 4,9
	East Taylor township 13,15
	Exeter township 6,9
	Franconia township 1,4
	Halfmoon township 12,15
	Hazle township 8,9
	Horsham township 1,4
	Jefferson township 15,16
	Lower Merion township 4,5
	North Middleton township 10,13
	Penn Hills township 17,18
	Philadelphia city 2,3,5
	Smithfield township 7,8
	South Fayette township 17,18
	Unity township 13,14
	Upper Mahanoy township 9,12
	York township 10,11

Citizen Voters

Split Count:	16
Segment Count:	33
Segment List:	Amity township 4,6
	Birmingham township 5,6
	Carnegie borough 16,17
	Eldred township 7,8
	Hermitage city 15,16
	Horsham township 1,4
	Lehman township 8,9
	Menallen township 10,12
	Philadelphia city 2,3,5
	Piney township 14,15
	Porter township 12,14
	Somerset township 12,13
	Spring township 6,11
	Upper Merion township 4,5
	Wayne township 9,11
	West Hanover township 9,10

Ward Splits

	2018 Court Enacted Map
Split Count:	15
Segment Count:	30
Segment List:	
	PHILADELPHIA WARD 03 3,5
	PHILADELPHIA WARD 05 2,3
	PHILADELPHIA WARD 51 3,5
	PHILADELPHIA WARD 52 3,4
	CRANBERRY DISTRICT EAST 16,17
	CRANBERRY DISTRICT WEST 16,17
	HORSHAM DISTRICT 02 1,4
	HORSHAM DISTRICT 04 1,4
	LOWER MERION WARD 06 4,5
	LOWER MERION WARD 09 3,4
	LOWER MERION WARD 11 4,5
	LOWER MERION WARD 12 4,5
	NORTH MIDDLETON PRECINCT 03 (CD 13) 10,13
	PENN HILLS WARD 05 17,18
	YORK WARD 05 10,11

	Citizen Voters
Split Count:	21
Segment Count:	42
Segment List:	
	AMITY DISTRICT 04 4,6
	AMITY DISTRICT 05 4,6
	CARNEGIE WARD 02 16,17
	HERMITAGE DISTRICT NW 15,16
	HERMITAGE DISTRICT SW 15,16
	HORSHAM DISTRICT 01 1,4
	HORSHAM DISTRICT 02 1,4
	LEHMAN DISTRICT 02 8,9
	PHILADELPHIA WARD 03 3,5
	PHILADELPHIA WARD 05 2,3
	PHILADELPHIA WARD 39 3,5
	PHILADELPHIA WARD 40 3,5
	PHILADELPHIA WARD 51 3,5
	SOMERSET DISTRICT 03 12,13
	SOMERSET DISTRICT 04 12,13
	SPRING DISTRICT 10 6,11
	SPRING DISTRICT 11 6,11
	UPPER MERION DISTRICT BELMONT 4,5
	WAYNE PRECINCT 02 9,11
	WEST HANOVER DISTRICT 03 9,10
	WEST HANOVER DISTRICT 04 9,10

School District Splits

2018 Court Enacted Map

Split Count:	124	
Segment Count:	261	
Segment List:	Bald Eagle Area SD	12,15
	Baldwin-Whitehall SD	17,18
	Bellefonte Area SD	12,15
	Bensalem Township SD	1,2
	Blackhawk SD	16,17
	Blairsville-Saltsburg SD	13,14,15
	Boyertown Area SD	4,9
	Brandywine Heights Area SD	4,9
	Burgettstown Area SD	14,17
	Butler Area SD	15,16
	Cameron County SD	12,15
	Canon-McMillan SD	14,18
	Carlisle Area SD	10,13
	Chartiers Valley SD	17,18
	Conemaugh Valley SD	13,15
	Connellsville Area SD	13,14
	Conrad Weiser Area SD	6,9
	Corry Area SD	15,16
	Crestwood SD	8,9
	Cumberland Valley SD	10,12
	Dallas SD	8,9
	Dallastown Area SD	10,11
	Daniel Boone Area SD	4,6,9
	Danville Area SD	9,12
	Derry Area SD	13,14
	Dover Area SD	10,11,13
	East Stroudsburg Area SD	7,8
	Eastern York SD	10,11
	Easton Area SD	1,7
	Elizabeth Forward SD	14,18
	Elizabethtown Area SD	10,11
	Ellwood City Area SD	16,17
	Exeter Township SD	6,9
	Fannett-Metal SD	12,13
	Forest City Regional SD	8,12
	Forest Hills SD	13,15
	Franklin Area SD	15,16
	Freeport Area SD	14,15
	Greater Johnstown SD	13,15
	Greater Latrobe SD	13,14
	Greater Nanticoke Area SD	8,9
	Hatboro-Horsham SD	1,4
	Hazleton Area SD	8,9
	Huntingdon Area SD	12,13
	Jim Thorpe Area SD	8,9
	Keystone Central SD	12,15
	Kiski Area SD	14,15
	Lackawanna Trail SD	8,12
	Lake-Lehman SD	8,9,12
	Leechburg Area SD	14,15
	Ligonier Valley SD	13,15
	Line Mountain SD	9,10,12
	Lower Dauphin SD	9,10,11
	Lower Merion SD	3,4,5
	Marple Newtown SD	5,6
	McKeesport Area SD	14,18
	Methacton SD	4,6
	Moniteau SD	15,16
	Mount Pleasant Area SD	13,14
	Mount Union Area SD	12,13
	Newport SD	10,12
	North Hills SD	17,18
	North Penn SD	1,4
	Northern Lebanon SD	9,10

Citizen Voters

Split Count:	109	
Segment Count:	229	
Segment List:	Apollo-Ridge SD	14,15
	Armstrong SD	14,15
	Bensalem Township SD	1,2
	Blairsville-Saltsburg SD	13,14
	Blue Mountain SD	4,9,11
	Boyertown Area SD	1,4,6
	Burgettstown Area SD	13,16
	Canon-McMillan SD	13,17
	Carlynton SD	16,17
	Central Dauphin SD	9,10
	Chartiers Valley SD	16,17
	Colonial SD	4,5
	Conemaugh Township Area SD	12,13
	Corry Area SD	14,15
	Crestwood SD	8,9
	Daniel Boone Area SD	4,6
	East Pennsboro Area SD	10,12
	East Stroudsburg Area SD	7,8
	Eastern York SD	10,11
	Easton Area SD	1,7
	Elizabeth Forward SD	13,17
	Elizabethtown Area SD	10,11
	Forest Area SD	14,15
	Forest City Regional SD	8,9
	Forest Hills SD	12,14
	Freeport Area SD	13,15
	Galeton Area SD	9,14
	Gettysburg Area SD	10,12
	Governor Mifflin SD	6,11
	Greater Nanticoke Area SD	8,9
	Hamburg Area SD	4,11
	Hatboro-Horsham SD	1,4
	Hazleton Area SD	8,9
	Hermitage SD	15,16
	Huntingdon Area SD	12,14
	Indiana Area SD	14,15
	Jersey Shore Area SD	9,14
	Juniata County SD	9,12
	Juniata Valley SD	12,14
	Keystone Central SD	9,14
	Kiski Area SD	13,15
	Lackawanna Trail SD	8,9
	Lake-Lehman SD	8,9
	Leechburg Area SD	13,15
	Ligonier Valley SD	13,14
	Lower Dauphin SD	9,10,11
	Lower Merion SD	4,5
	Marple Newtown SD	5,6
	McKeesport Area SD	13,17
	Methacton SD	4,6
	Meyersdale Area SD	12,13
	Montour SD	16,17
	Mount Union Area SD	12,14
	Muhlenberg SD	4,11
	Newport SD	9,12
	North Hills SD	16,17
	North Penn SD	1,4
	North Star SD	12,13
	Northern Lebanon SD	9,11
	Northern York County SD	10,12
	Northgate SD	16,17
	Octorara Area SD	6,11
	Owen J Roberts SD	4,6
	Oxford Area SD	6,11

Northgate SD	17,18	Panther Valley SD	8,9
Octorara Area SD	6,11	Penn Cambria SD	12,14
Oswayo Valley SD	12,15	Penn Hills SD	16,17
Owen J Roberts SD	4,6	Penn-Trafford SD	13,17
Oxford Area SD	6,11	Peters Township SD	13,17
Penn Cambria SD	13,15	Philadelphia City SD	1,2,3,4,5
Penn Hills SD	17,18	Phoenixville Area SD	4,6
Penn-Trafford SD	14,18	Pine Grove Area SD	9,11
Penncrest SD	15,16	Pine-Richland SD	15,16
Penns Valley Area SD	12,15	Pittsburgh SD	16,17
Peters Township SD	14,18	Pleasant Valley SD	7,8
Philadelphia City SD	1,2,3,4,5	Pocono Mountain SD	7,8
Phoenixville Area SD	4,6	Pottstown SD	4,6
Pine-Richland SD	16,17	Reading SD	4,6
Pittsburgh SD	17,18	Redbank Valley SD	14,15
Pleasant Valley SD	7,8,9	Schuylkill Valley SD	4,6,11
Plum Borough SD	17,18	Shade-Central City SD	12,13
Pocono Mountain SD	8,9	Solanco SD	6,10,11
Port Allegany SD	12,15	Somerset Area SD	12,13
Pottstown SD	4,6	Souderton Area SD	1,4
Reading SD	6,9	South Fayette Township SD	13,16,17
Richland SD	13,15	Spring-Ford Area SD	4,6
Riverview SD	17,18	Susquehanna Community SD	8,9
Rockwood Area SD	13,14	Susquenita SD	9,12
Schuylkill Valley SD	6,9	Titusville Area SD	14,15
Seneca Valley SD	16,17	Tredyffrin-Easttown SD	4,5,6
Shamokin Area SD	9,12	Twin Valley SD	6,11
Solanco SD	6,11	Tyrone Area SD	12,14
Souderton Area SD	1,4	Union SD	14,15
South Butler County SD	15,16	Unionville-Chadds Ford SD	5,6
South Fayette Township SD	14,17,18	United SD	13,14
Southern Columbia Area SD	9,12	Upper Adams SD	10,12
Spring Grove Area SD	10,11,13	Upper Darby SD	3,5
Spring-Ford Area SD	4,6	Upper Merion Area SD	4,5,6
State College Area SD	12,15	Upper Perkiomen SD	1,4
Sullivan County SD	9,12	West Allegheny SD	16,17
Susquehanna Community SD	8,12	West Chester Area SD	5,6
Susquenita SD	10,12	West Middlesex Area SD	15,16
Titusville Area SD	15,16	West Shore SD	10,12
Tredyffrin-Easttown SD	4,6	Wilkinsburg Borough SD	16,17
Turkeyfoot Valley Area SD	13,14	Wilmington Area SD	15,16
Twin Valley SD	6,11	Wilson Area SD	1,7
Tyrone Area SD	13,15	Wilson SD	6,11
Uniontown Area SD	13,14	Windber Area SD	12,14
Unionville-Chadds Ford SD	5,6	Wyoming Area SD	8,9
United SD	13,15		
Upper Darby SD	3,5		
Upper Merion Area SD	4,6		
Upper Perkiomen SD	4,9		
Upper Saint Clair SD	17,18		
Warrior Run SD	9,12		
Weatherly Area SD	8,9		
West Branch Area SD	12,15		
West Chester Area SD	5,6		
Wilkinsburg Borough SD	17,18		
Williams Valley SD	9,10		
Wilson Area SD	1,7		
Wilson SD	6,9		
Windber Area SD	13,15		
Wyoming Area SD	8,12		

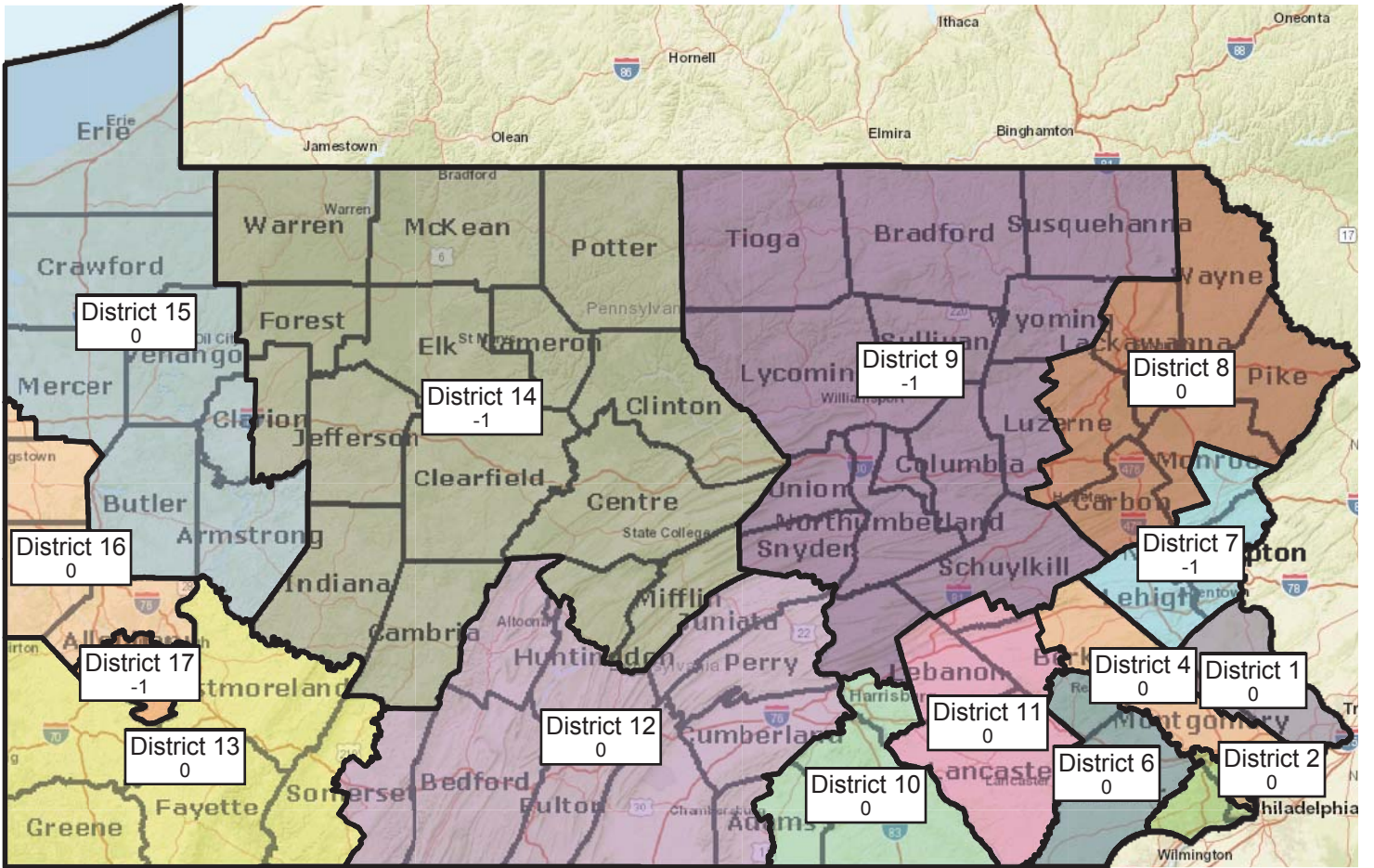
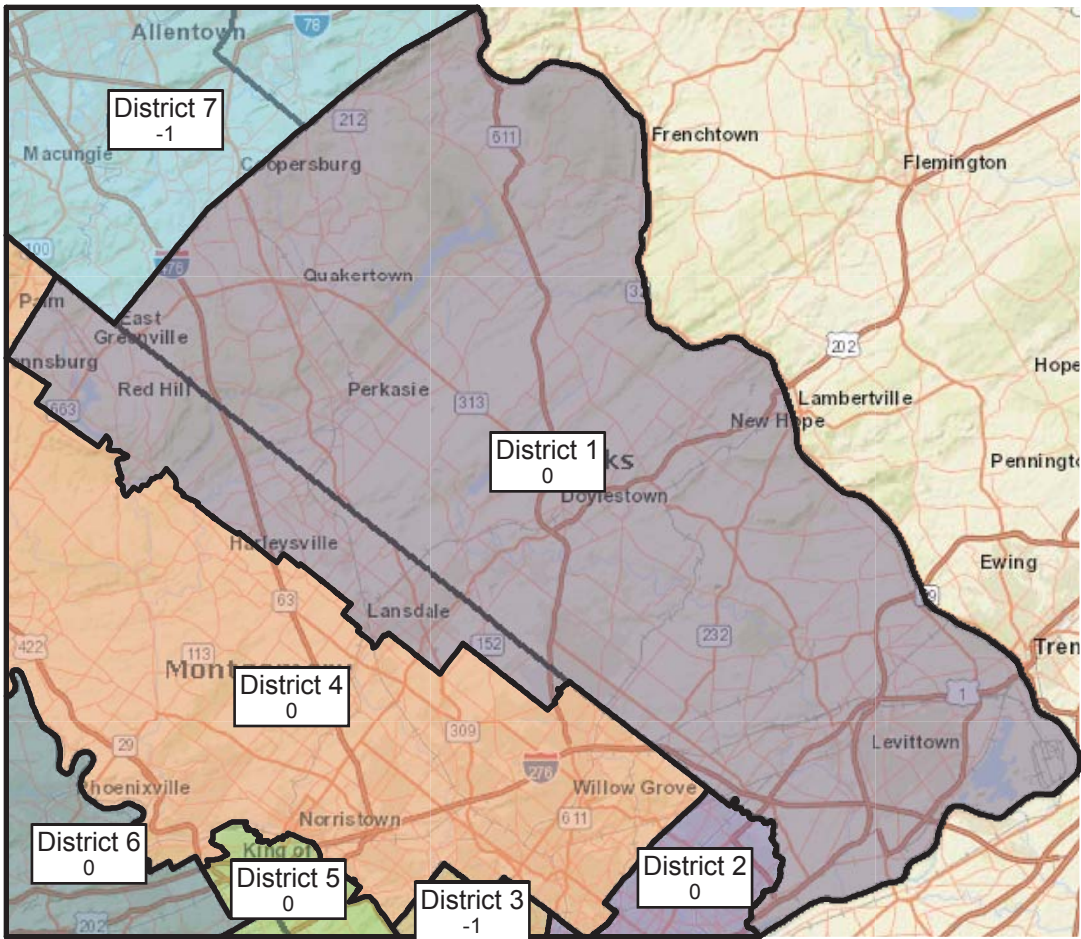
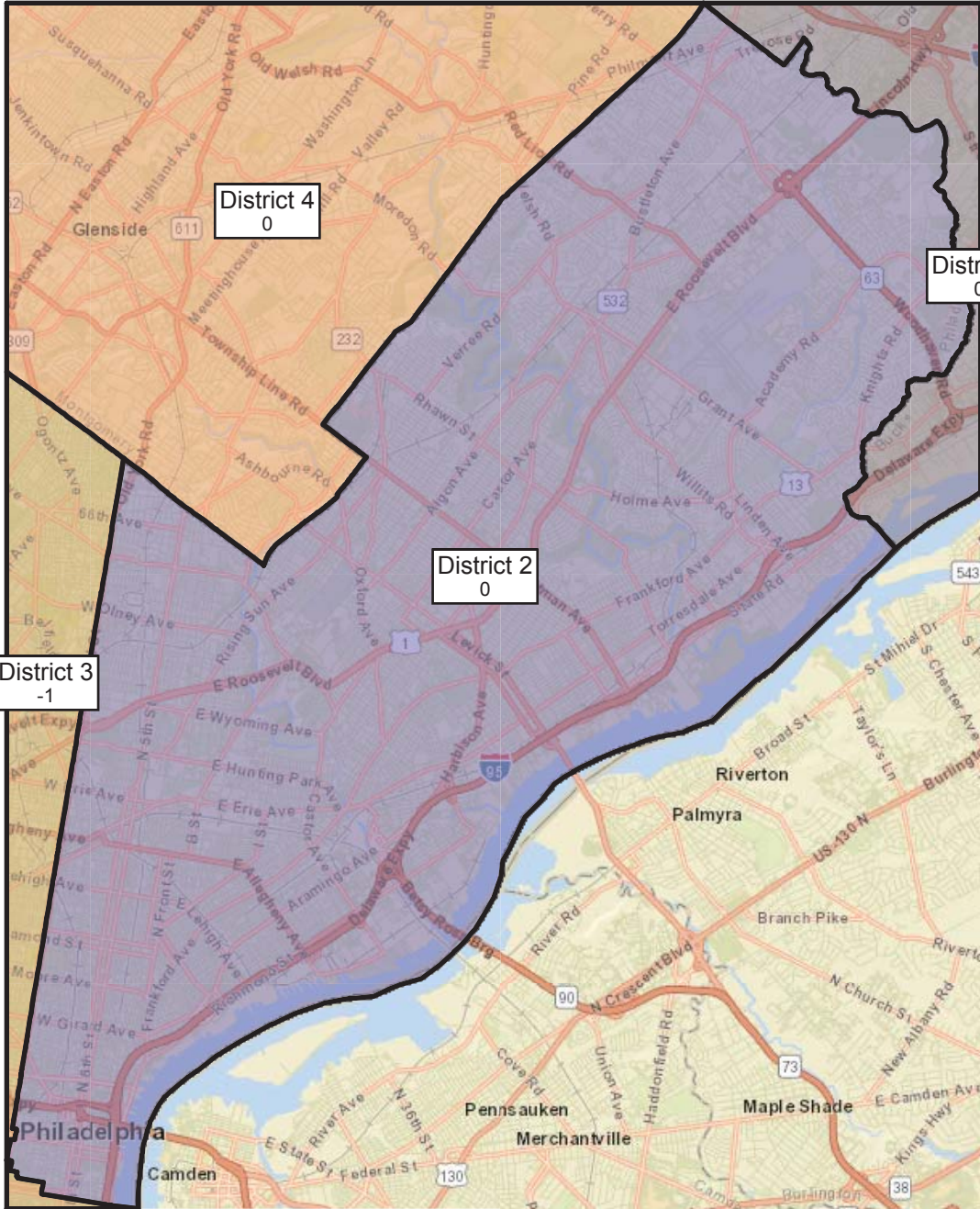


Exhibit "E"



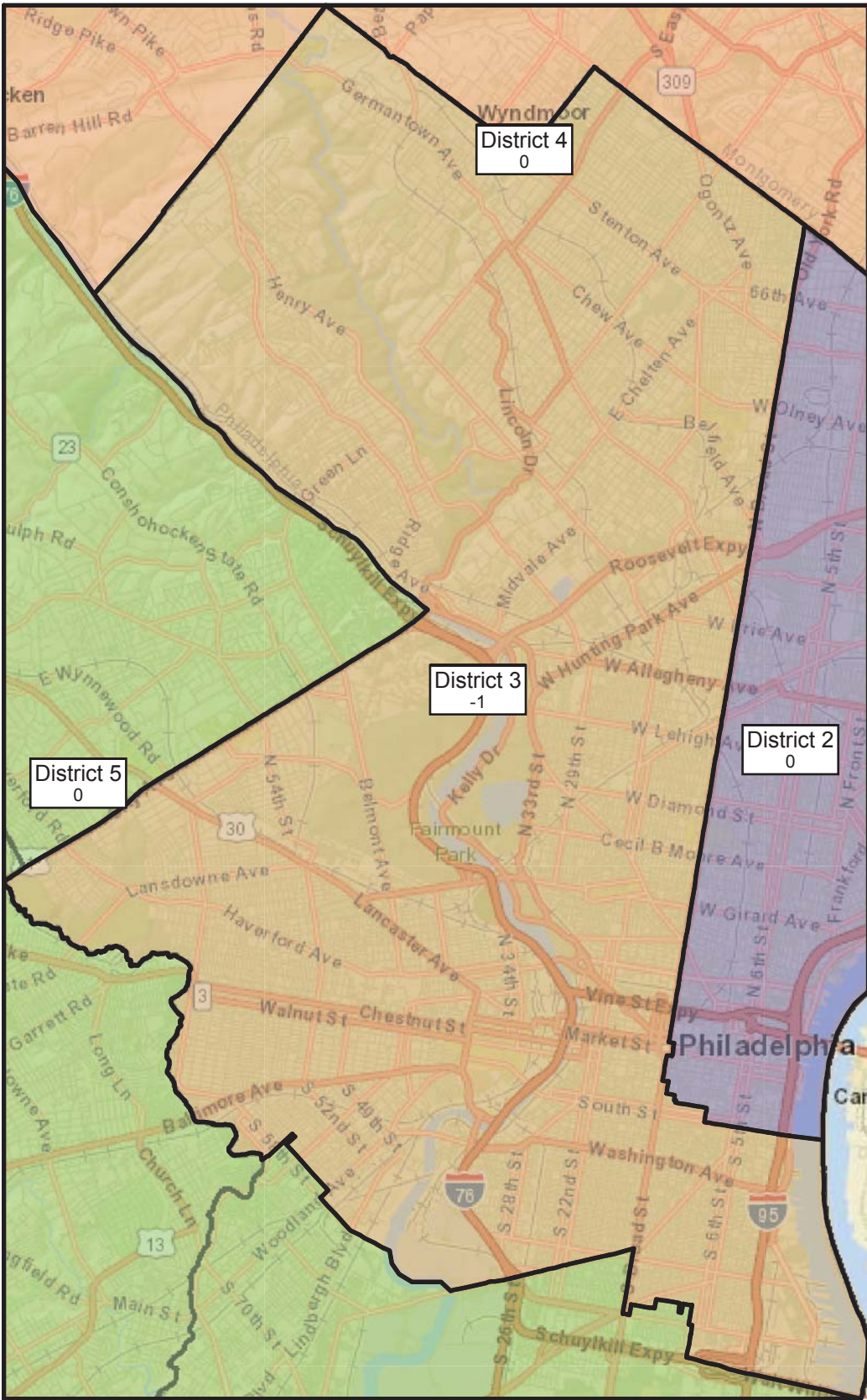


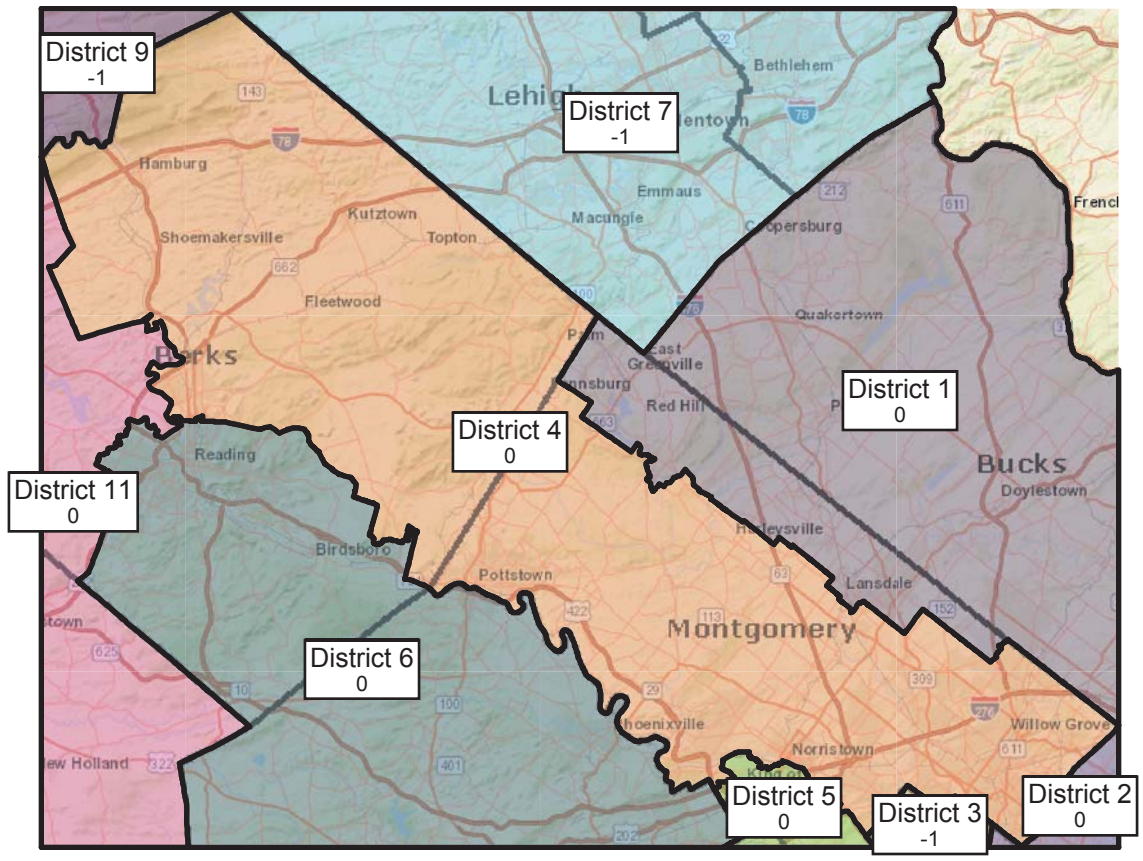
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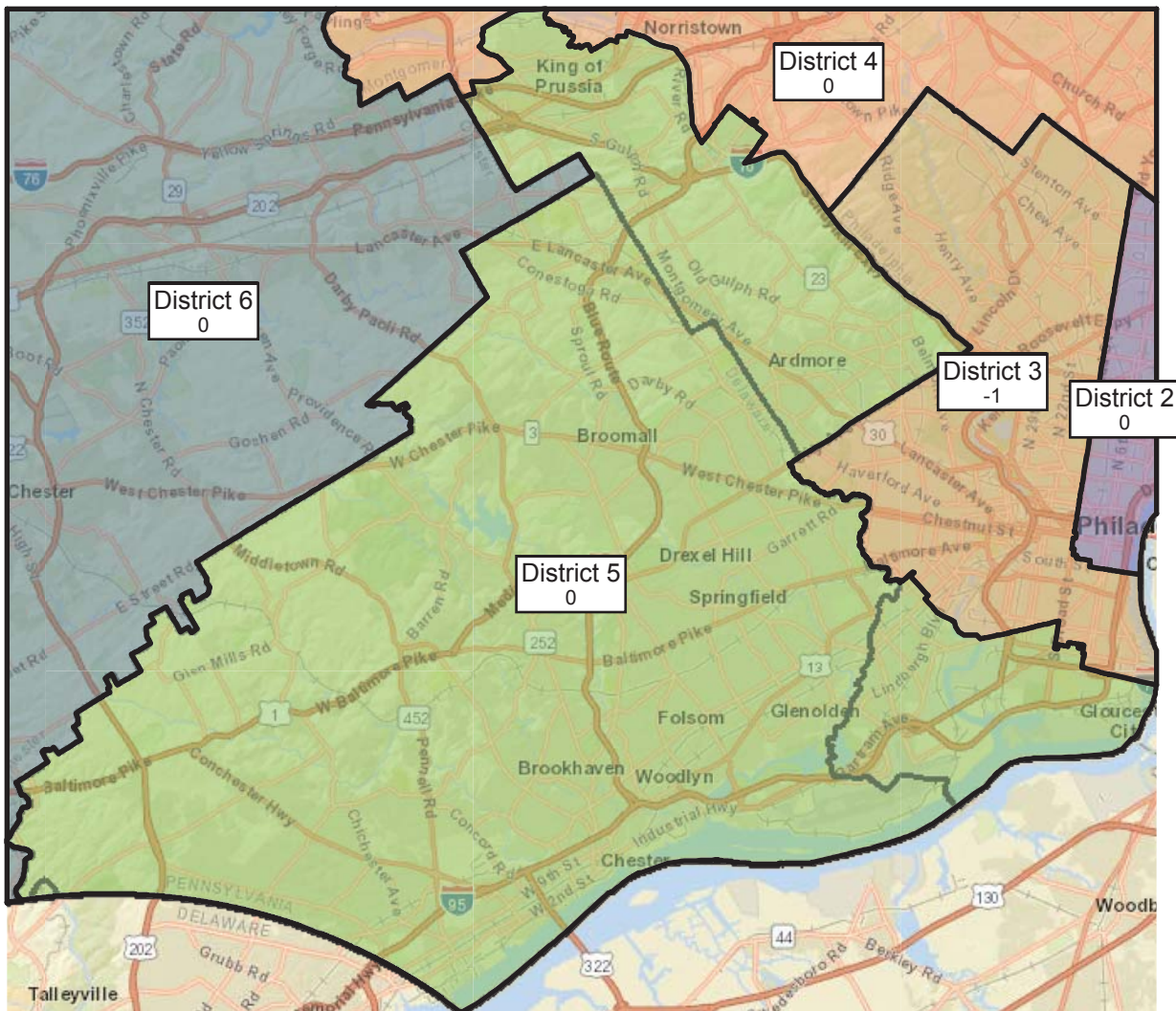
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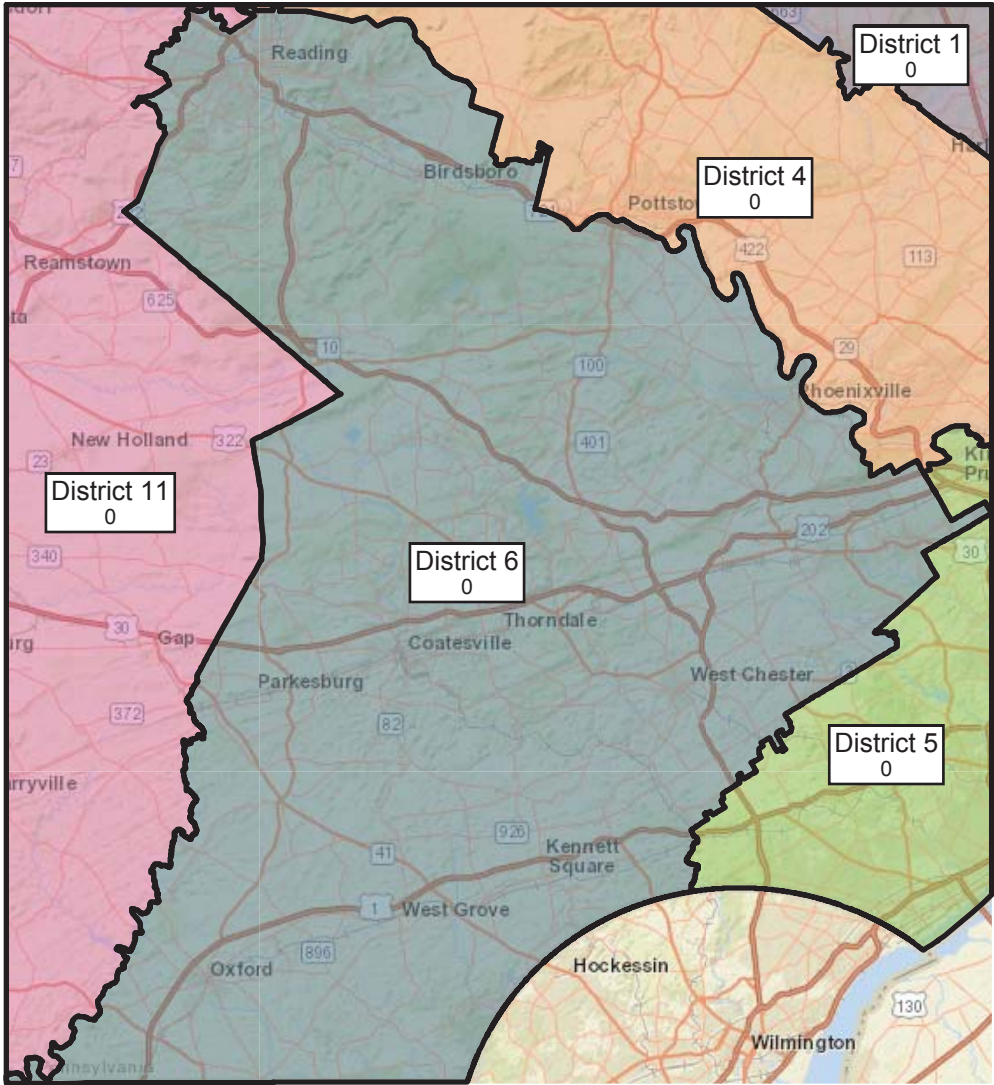
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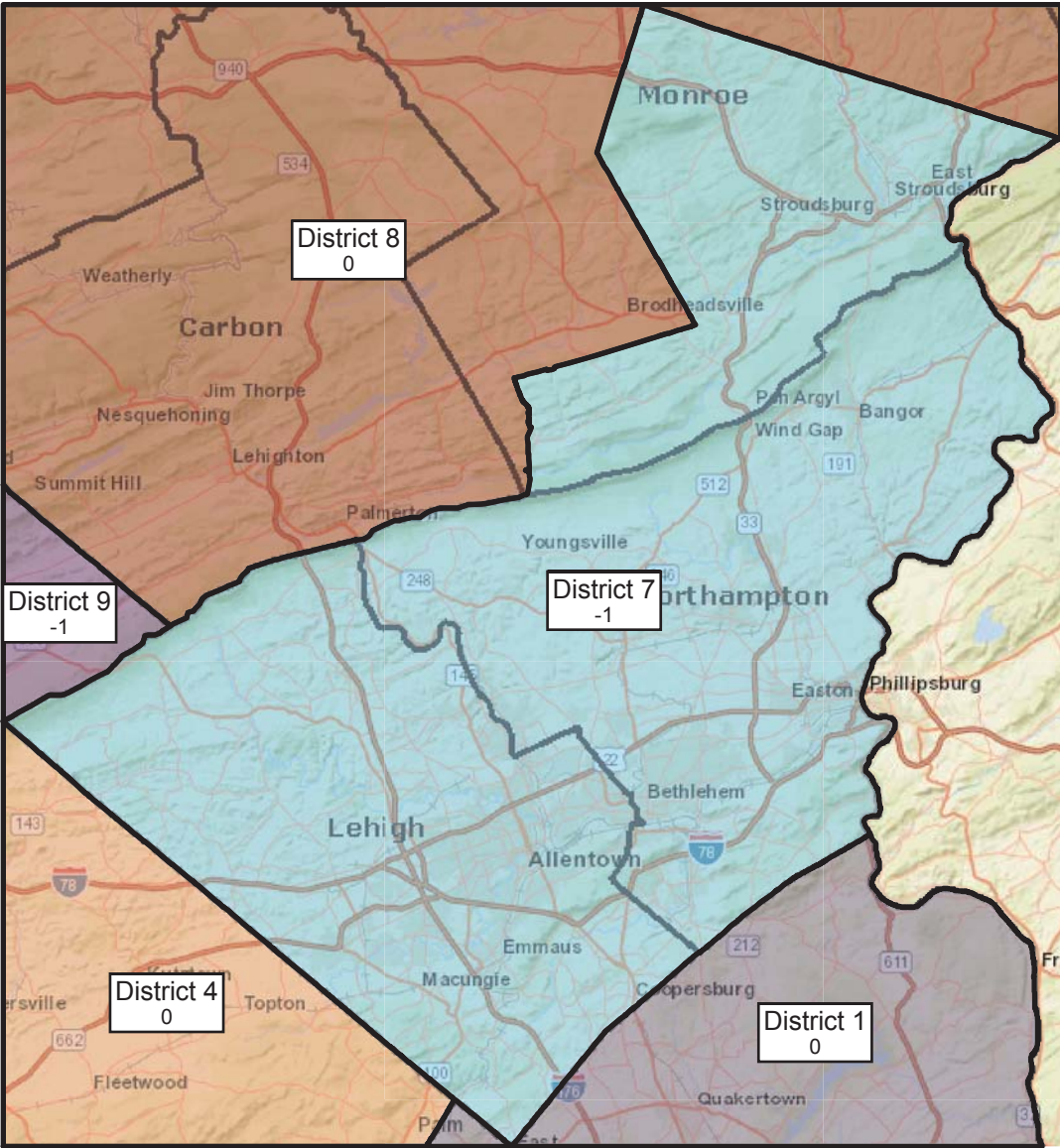
District 3
-1

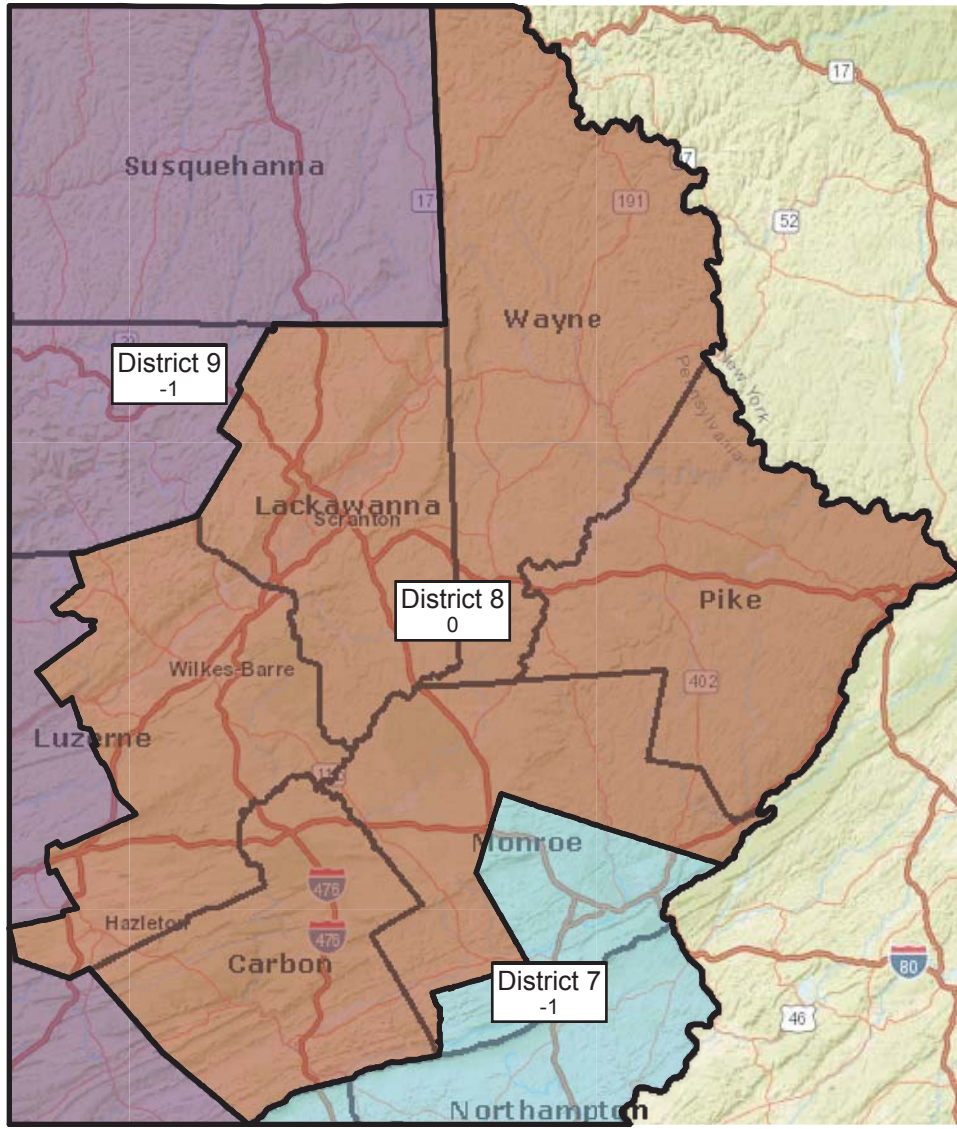


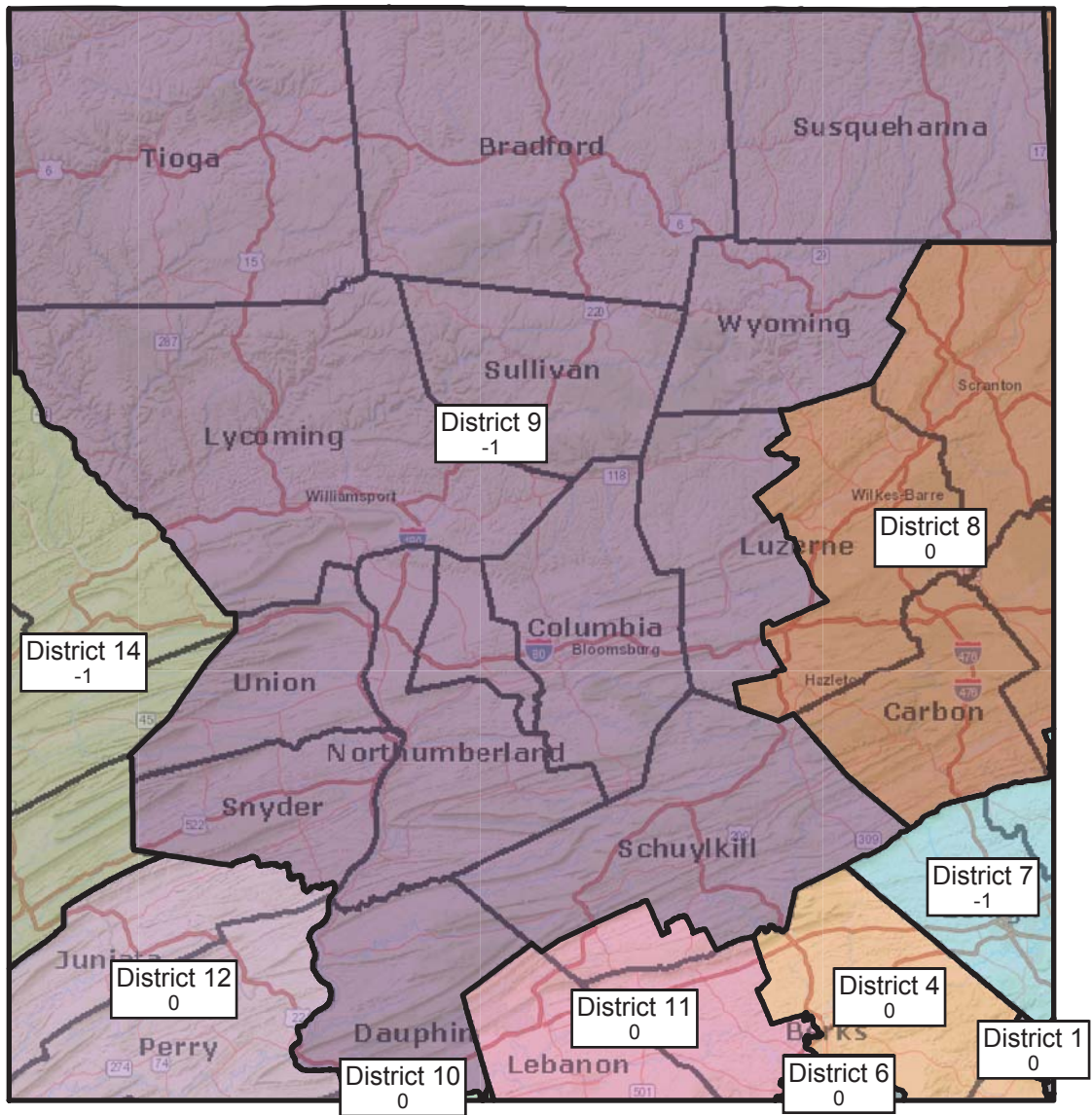


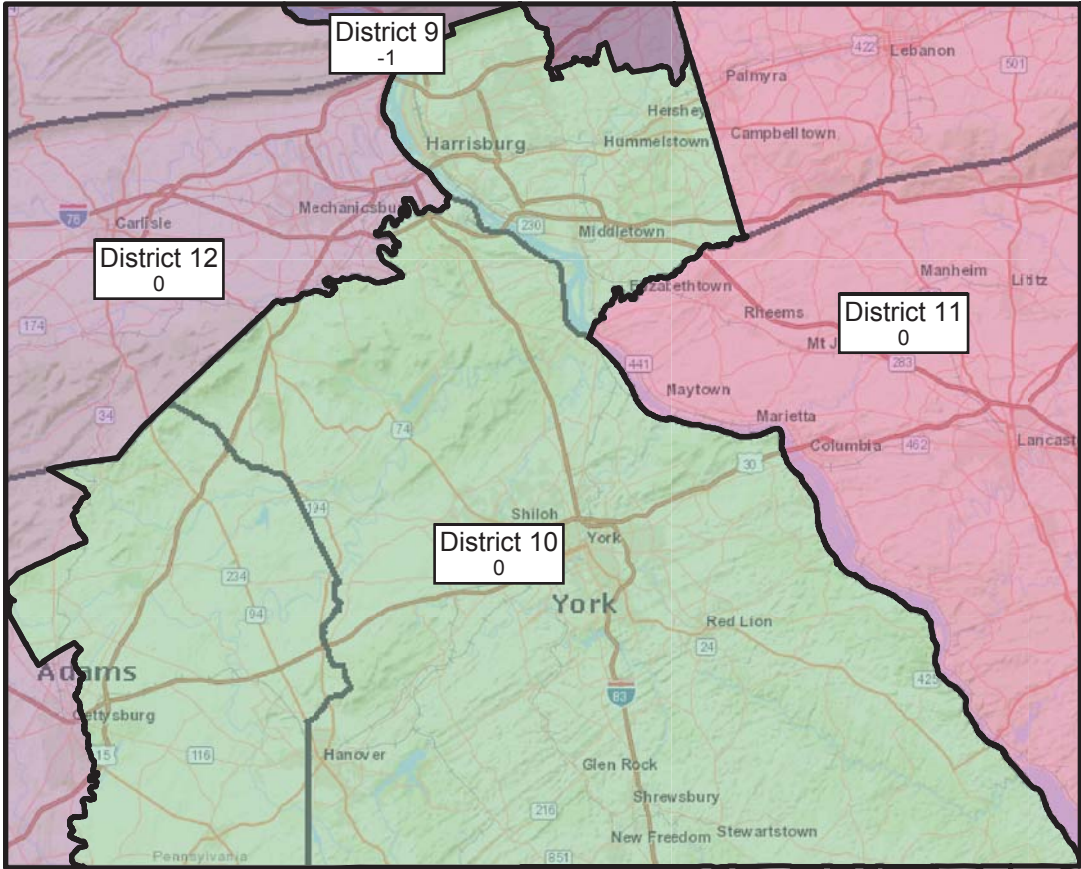


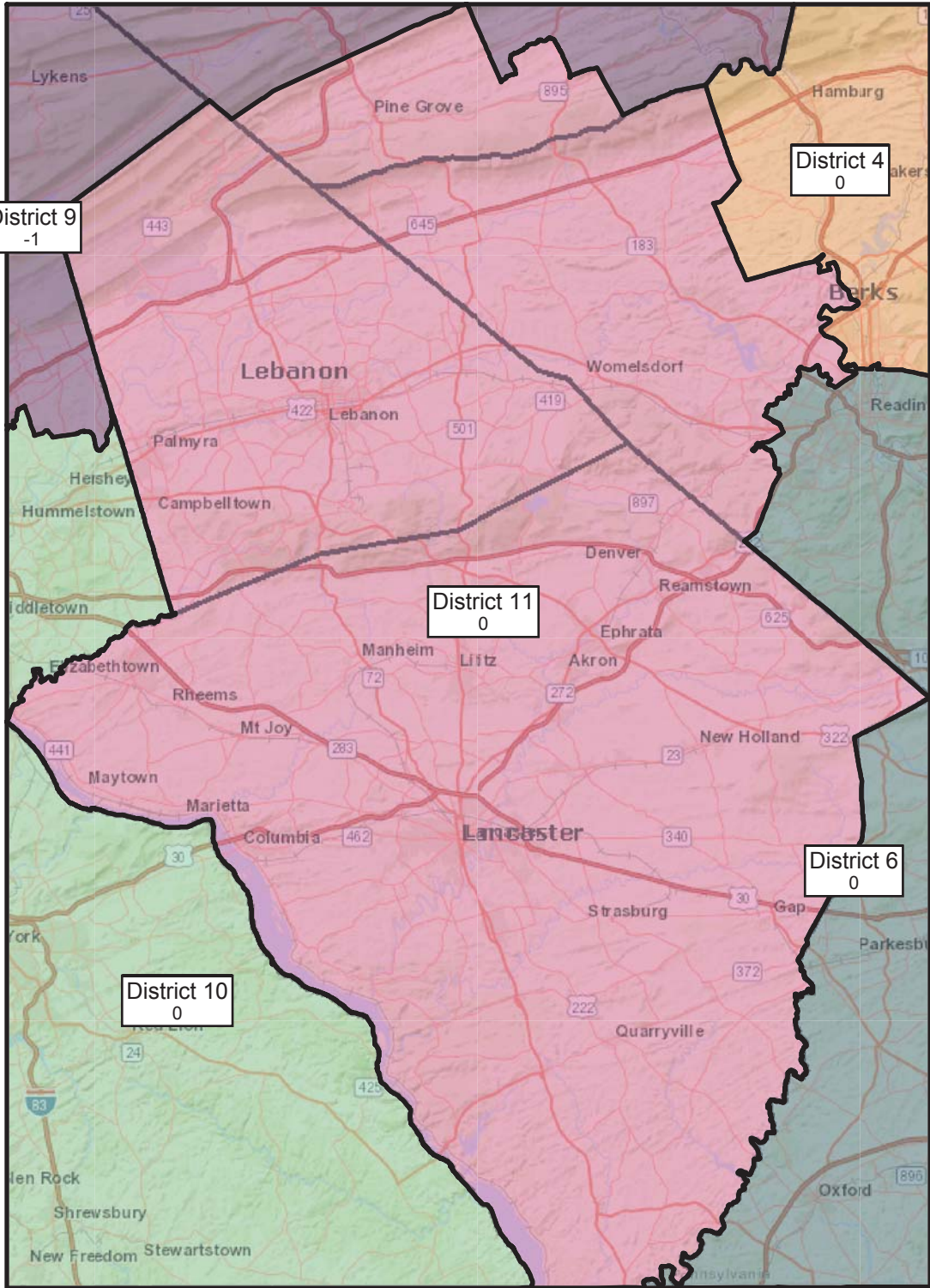


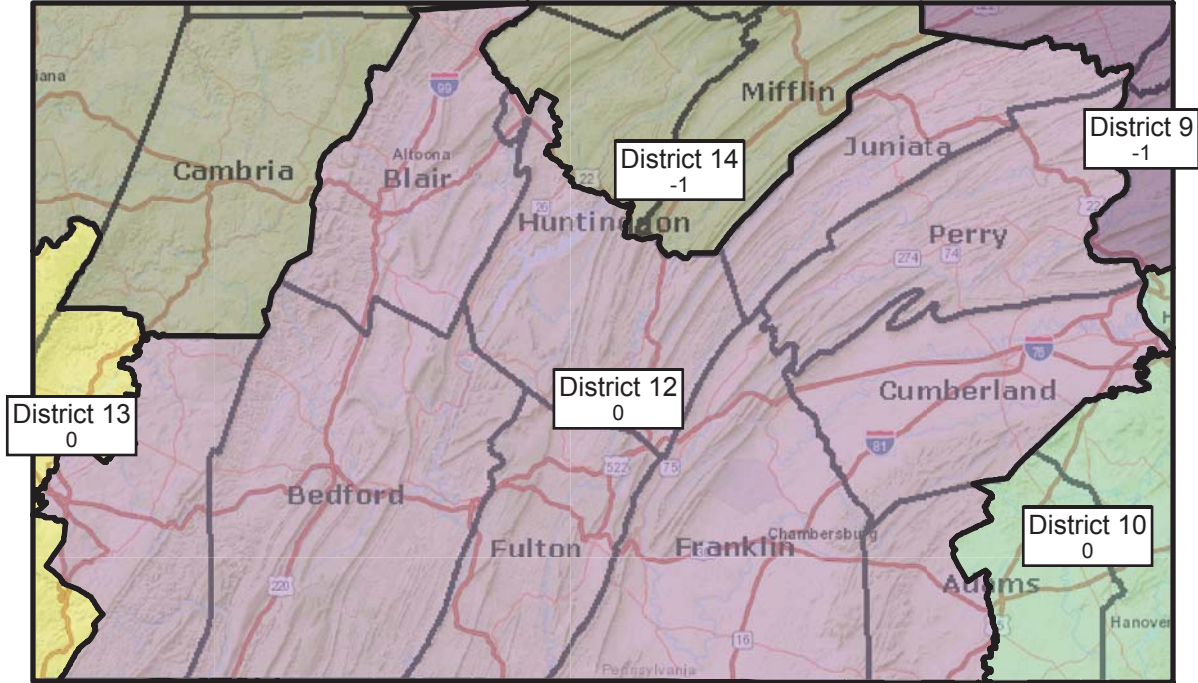


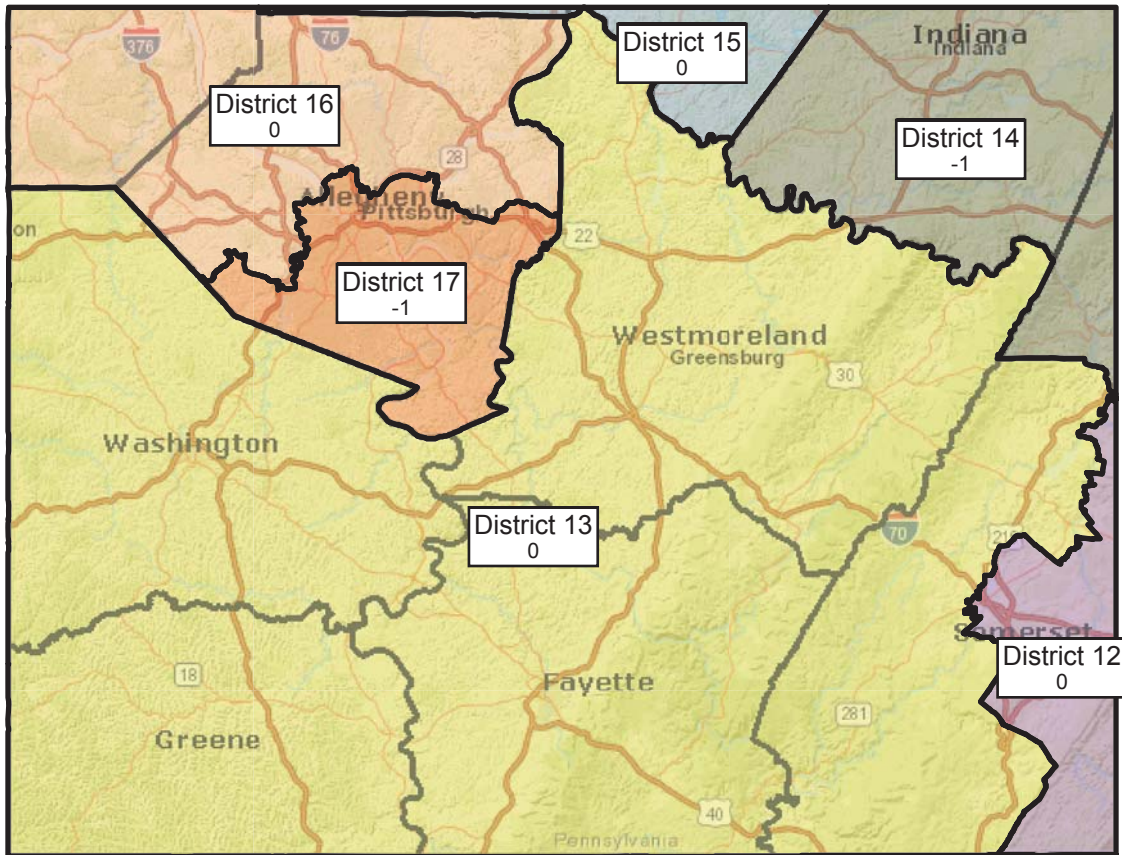


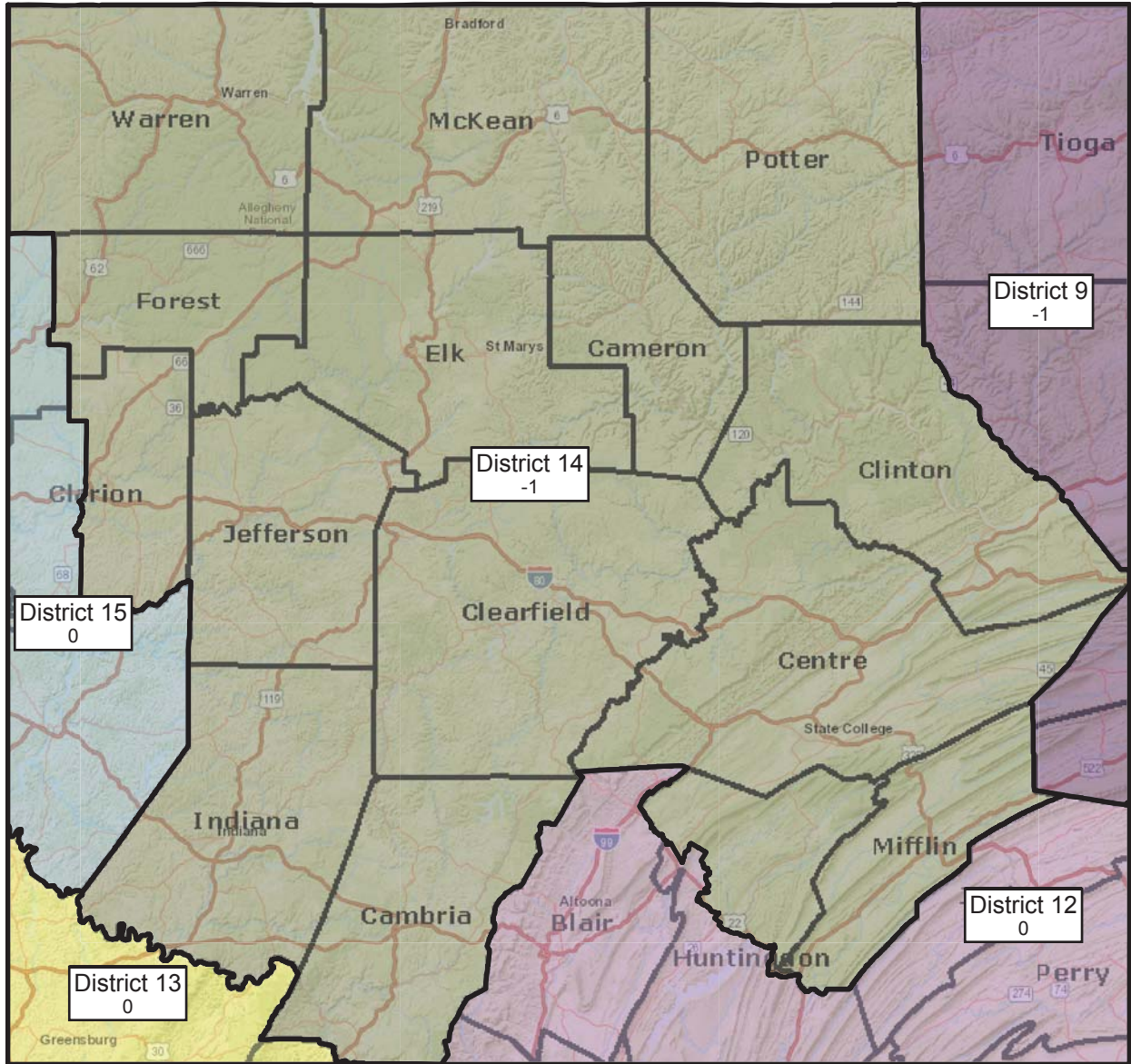


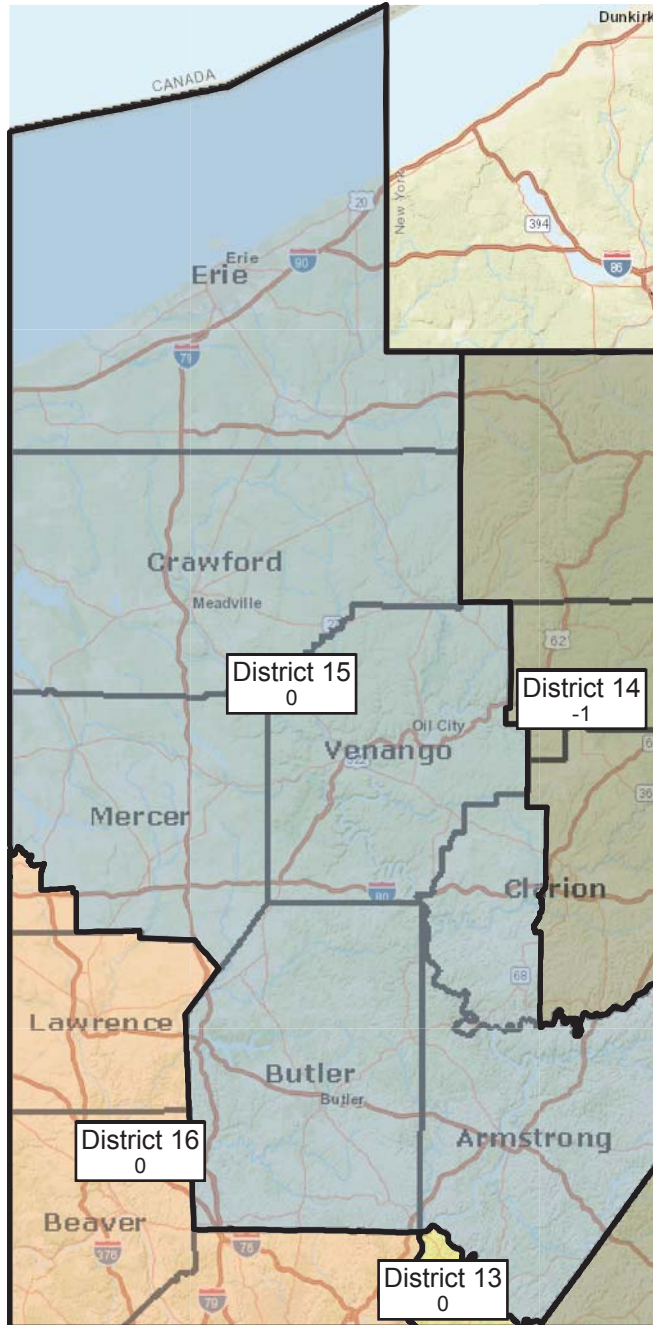


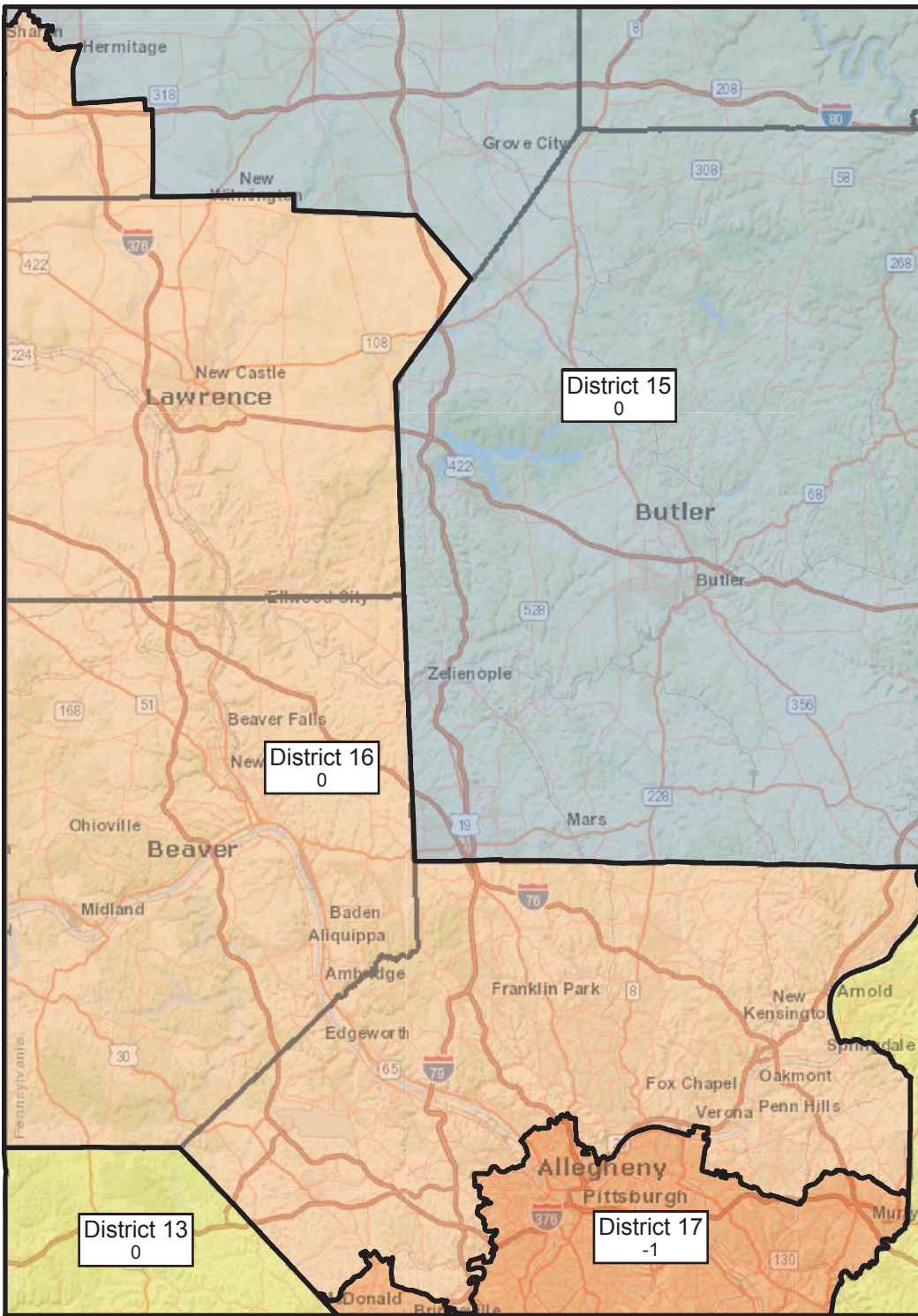


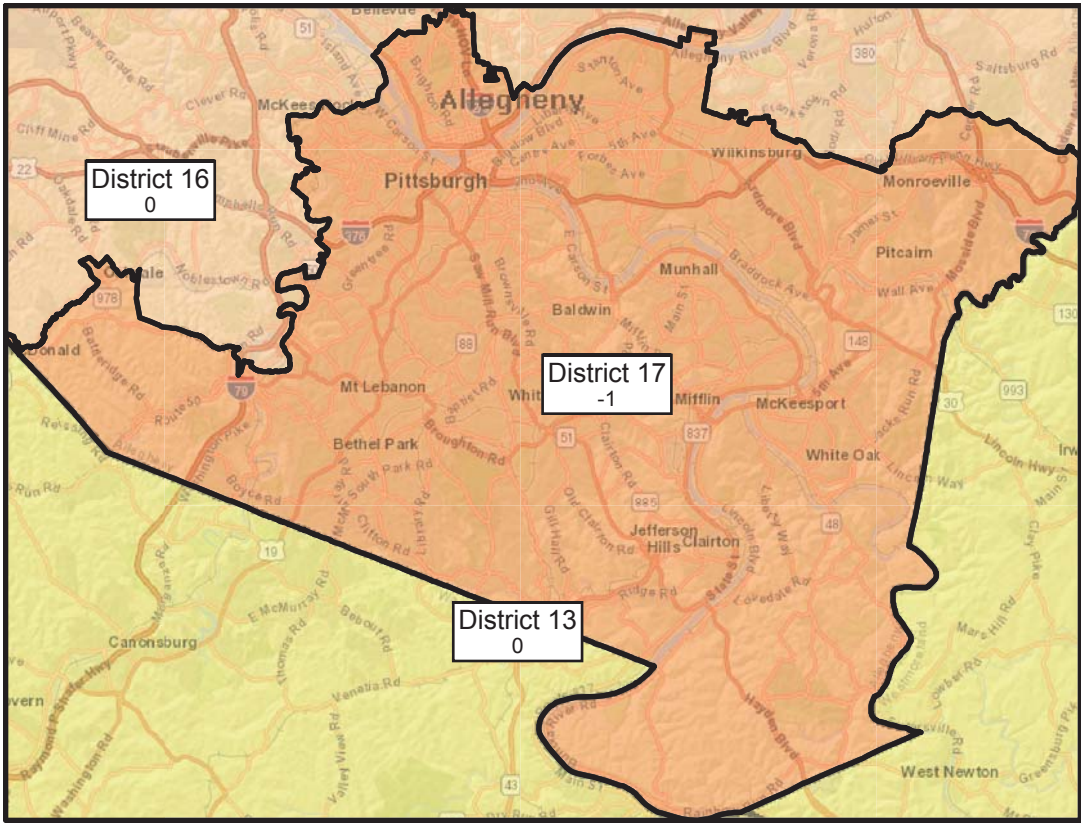












District 16
0

District 17
-1

District 13
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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Thomas W. King, III
Thomas W. King, III

CERTIFICATE OF SERVICE

I certify that this filing was served via PACFile upon all counsel of record this 24th day of January, 2022.

/s/ Thomas W. King, III
Thomas W. King, III