

APPENDIX B

INTRODUCTION

We as petitioners are providing detailed information into how and why we drew each and every district in Pennsylvania in both the House and Senate. We feel that every split that we make should be justified so that it can be deemed “absolutely necessary” per the Pennsylvania Constitution. Had the LRC done their job like we did ours, it would be unnecessary for us to be here, as the citizens of Pennsylvania would be have as many compact districts of as equal population as possible without unnecessary municipal splits. We are demonstrating to this Court that this process could and should have been done better, not only for the common good of the citizens of Pennsylvania, but also to comply with the Constitution of our Commonwealth. We hope that you agree with our reasoning behind why we drew the districts the way we did, and also agree with us that the Legislative Reapportionment Commission’s (LRC) plan is contrary to law and that our plan is in adherence to the Constitution.

HOUSE DISTRICTS

DISTRICT 1. Erie County. Incumbent Pat Harkins (2007), seeking reelection. This is one of the four districts in Pennsylvania where we had an incumbent that was seated prior to the Special Elections of 2012 get displaced, because there was no legal justification to keep his residence in his district. The incumbent is a resident of Ward 6, Division 4, (see Exhibit D) and the State Representative for District 2, Florindo Fabrizio, is also a resident of the same ward, (Exhibit D) and has seniority as he was seated in 2003. Therefore, based upon our ground rules, we placed both incumbents in District 2, and District 1 becomes an open seat. The incumbent would have a choice to run in District 2, or move to his old District 1, which would now be in the Erie City suburbs, or perhaps move to District 4, which would have incumbent Curt Sonney in it, however, the new District 4 under Petitioners plan would contain 3 wards in Erie City, and Mr. Harkins represented 2 of them in the past. Petitioners believe that due to the delay caused by the previous remand that incumbents wishing to get elected to their old districts can simply move, and still be in compliance with the Constitutional requirement that Representatives reside in their districts for at least one year prior to the next Election, and thus Mr. Harkins would have until November 4, 2013 to move. Additionally, in this case, the new District 4 contains much of the same territory as the old District 1 from the 2001 Map (Exhibit E). The new District 1 is not as compact as some of the other Erie County districts, however, maintains continuity of citizenship by uniting the outer Erie City suburbs on both the west and east side of the city, and contains most of the I-90 corridor, and also such a drawing was necessary to maintain the compactness of Districts 2, 3, and 4 and also allow 4 districts to remain entirely in Erie County.

DISTRICT 2. Erie County. Incumbent Florindo Fabrizio, (2003), seeking reelection. The incumbent is a resident of Ward 6, and in following our Ground Rules, we avoid splitting this ward. The City of Erie is one of the municipalities that are outside the upper range of a district and therefore must get split. Also, in keeping with our Ground Rules, we would rather split a municipality that is required to be split into multiple splits rather than a smaller municipality that does not need to be split due to its size. So, Districts 1, 2, and 3 do wind up splitting Erie, when the population would only require, in theory, 1 split instead of 2. However, as indicated in the LRC plan, this would require the Township of Millcreek to get split into multiple districts, which Petitioners find unnecessary. This district is very compact and encompasses just 2 wards (5 and 6). The 2001 map has 5 ward splits and a municipal split and the 2011 Plan has 2 ward splits and a municipal split. All of these splits are unnecessary, and Petitioners draw a compact district within the population deviation as defined in the Ground Rules by just including these two wards.

DISTRICT 3. Erie County. Incumbent John Hornaman, NOT seeking reelection. This is the first district that we come to that the incumbent is not seeking reelection. As defined in the Ground Rules, this allows us to potentially move the district if necessary. However, in this case, we found that the population changes in the district did not warrant it to move much compared to the 2001 plan or the 2012 LRC plan. Petitioners drew a compact district with only a 581 person deviation from the statistical ideal mean by just including one ward in Erie City and the Township of Millcreek. The incumbent (while

not seeking reelection) is a Millcreek Township resident and Millcreek Township will remain the largest municipality in the district. Petitioners found no need for the split in the LRC plan which took two divisions out of Millcreek Township and put them into District 2.

DISTRICT 4. Erie County. Incumbent Curt Sonney (2005), seeking reelection. District 4 has historically been a district that was drawn east of Erie City. The previous three representatives, Forest Hopkins, Harry Bowser, and Tom Scrimenti, were all residents of North East Township, which has the distinction of being the northern most municipality in Pennsylvania. However, because the incumbent lives in Harborcreek Township, the district will still maintain the immediate eastern Erie City suburban towns of Harborcreek and Greene, but will also take in a part of Erie City, and will lose some of the other outlying townships to District 1. The district remains compact and has a population deviation of just 267 people from the ideal statistical mean. Overall, both the 2012 LRC Revised Final plan and Petitioners Alternative Plan have Districts 1 through 4 entirely in Erie County. However, amongst these districts, the LRC plan makes 4 ward splits in Erie City and an additional municipal split in Millcreek Township, where the Petitioners Alternative plan has no ward splits and no municipal split.

DISTRICT 5. Currently Erie County, LRC plan moves to Berks County, Petitioners Plan moves to Chester County. Incumbent John Evans, NOT seeking reelection. As discussed in the Ground Rules, one seat from Northwestern Pennsylvania should be moved due to population shifts. Both the LRC and Petitioners identified District 5 as the district that will move, in part due to the retirement of the incumbent and in part due to the fact the district required a county split. Much of the old district is consumed by Districts 1, 6, and 17. Petitioners also draw a new district in Berks County but simply assign it a different number. Petitioners also draw a second additional district per the Ground Rules in District 169, which will be discussed later. The resulting open seat in Northern Chester County is a very compact district that stretches from the Berks County border south and east to the northern fringe of the Coatesville/Downingtown area.

DISTRICT 6. Currently Crawford County, Both LRC and Petitioners draw as Crawford and Erie Counties in new map. Incumbent Brad Roe, (2007), seeking reelection. Both LRC and Petitioners are in agreement that due to the loss of District 5, District 6 should move northward and encompass part of Erie County. The municipalities included in the LRC plan and Petitioners plan are similar. No municipal splits occur in either plan.

DISTRICT 7. Mercer County. Incumbent Mark Longietti (2007), seeking reelection. Again, LRC and Petitioners are in basic agreement. The cities of Farrell, Hermitage, and Sharon are in the 2001 map and also in both the 2012 LRC map and Petitioners Alternative Plan. No municipal or county splits occur in either plan.

DISTRICT 8. Butler and Mercer Counties. Incumbent Dick Stevenson (2001), seeking reelection. Once again, LRC and Petitioners are in basic agreement. Both plans believe the county split is necessary. Petitioners plan is slightly more compact, has a smaller population deviation from the ideal statistical mean, and also keeps the community of Slippery Rock in a district than encompasses just two counties, instead of being in District 10 which encompasses three counties.

DISTRICT 9. Currently Beaver and Lawrence Counties, both LRC and Petitioners Plan Lawrence County. Incumbent Chris Sainato (1995). Both LRC and Petitioners Plan remove the unnecessary 2001 county split that added Darlington Borough and Township in Beaver County in the district. Both plans have the district centered around the City of New Castle and both plans have the district very compact. Petitioners plan has a slightly smaller population deviation from the ideal statistical mean.

DISTRICT 10. Currently Beaver, Butler, and Lawrence County, LRC Plan remains Beaver, Butler and Lawrence Counties, Petitioners Plan Beaver and Lawrence Counties. Jaret Gibbons (2007), seeking reelection. LRC plan has an unnecessary county split but putting Slippery Rock Township and Borough into this district without any other part of Butler County. Petitioners include those municipalities in District 8, which allows residents of those municipalities to be represented in a district that has more of Butler County in it. Outside of eliminating the unnecessary county split, the districts are similar in both plans.

DISTRICT 11. Butler County. Incumbent Brian Ellis (2005), seeking reelection. Both plans center the district around the City of Butler, however Petitioners Plan is more compact and has a much smaller population deviation from the ideal statistical mean.

DISTRICT 12. Butler County. Incumbent Darryl Metcalfe (1999), seeking reelection. Both plans center this district in Southwestern Butler County, and have Cranberry Township as the largest municipality. Petitioners plan has this district almost as a perfect rectangle and therefore is nearly ideally compact.

DISTRICT 13. Currently Chester County, LRC plan is Chester and Lancaster Counties, Petitioners plan retains Chester County only. Incumbent John Lawrence (2011) seeking reelection. The LRC has an unnecessary county split by including two small municipalities in Lancaster County. This does not help the population deviation, as Petitioners plan removes this unnecessary county split and has a lower deviation than the LRC plan. The Petitioners plan creates a district in western and southwestern Chester County that maintains similar community homogeneity as this remains probably the most rural district in the Southeastern Pennsylvania area.

DISTRICT 14. Currently Beaver County, LRC plan is Beaver and Butler Counties, Petitioners plan retains Beaver County only. Incumbent Jim Marshall (2007) seeking reelection. The LRC again has an unnecessary county split by including a small part of Butler County in this district. Petitioners plan, by virtue of moving District 15, is able to

maintain no county splits in this district and also maintain a smaller population deviation than the LRC plan. It also is more compact than the LRC plan, as the district is drawn roughly as a square in Northwestern Beaver County.

DISTRICT 15. Currently Beaver County, LRC plan is Beaver and Washington Counties, Petitioners plan is Cumberland and Franklin Counties. Jim Christiana (2009), seeking reelection. As indicated in the Ground Rules, due to population changes in Western Pennsylvania, an additional district needed to be moved out of Western Pennsylvania. Amongst the different counties, it became clear that Allegheny County would have to lose a district, as well as Northwestern Pennsylvania in general, and both the Petitioners Plan moves the same two districts, 5 and 22, into other parts of the state. However, as calculated in Exhibit F, Southwestern Pennsylvania, as defined as Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Lawrence, Mercer, Washington and Westmoreland Counties, currently has 45 districts that are considered to be centered in one of these counties, however, it's population only supports 43 districts. Clearly Allegheny County loses one of these seats, as it has 21 districts centered in it but has the population that only supports 19.6. Therefore, collectively one district has to be removed from one of the remaining counties. Petitioners chose Beaver County for several reasons, one, that amongst counties that had 3 or more districts centered in it, it had the largest negative population deviation from the number of districts that were centered in it, it lost the most population of any county by percentage except for Fayette, and Fayette County already only has 2 districts but could support 2.2, so eliminating a Fayette County district would not be appropriate, and also, a Beaver County centered district never actually

moved, despite the fact that the population lost would justify at least one district being moved at some point over the last 5 reapportionments. We chose the 15th district due to the fact that the while all incumbents were seeking reelection, this incumbent had the least seniority amongst the Beaver County representatives, as well as the position of the district made it more able to be consumed by surrounding districts and prevent unnecessary county splits. We chose to move this district to South Central Pennsylvania, in addition to the district moved to York County, and centered this district in Northern Franklin County and Western Cumberland County. Both counties experienced double digit percentage growth in the past 10 years, and Franklin County only had one district (90) truly centered in Franklin County under the 2001 map. This district also unites both the Cumberland and Franklin County parts of Shippensburg Borough, which was raised as a complaint by another petitioner in the last round of challenges to the now remanded final plan, and generally unites the Shippensburg area community. Unfortunately for the incumbent, under our plan he is now in the 14th district and will have to run against the incumbent in that district if he wishes to retain his seat.

DISTRICT 16. Currently Allegheny and Beaver Counties, LRC plan remains Allegheny and Beaver Counties, Petitioners Plan is just Beaver County. Robert Matzie (2009), seeking reelection. Also by virtue of moving District 15, Petitioners can draw District 16 to eliminate an unnecessary county split. The LRC plan has two small municipalities in Allegheny County in this mostly Beaver County district. This is an improvement over the 2001 plan, which had a county split, three municipal splits, and three ward splits, but still, Petitioners Plan is superior with no county or municipal splits.

DISTRICT 17. Currently Crawford, Lawrence, and Mercer Counties. LRC plan has Crawford, Erie, Lawrence, and Mercer Counties, Petitioners plan has Crawford and Mercer Counties. Michele Brooks (2007), seeking reelection. It seems that District 17, since it's move from Allegheny County in the 1971 redistricting plan, is subject to whatever hodgepodge of counties and towns are left in Northwestern Pennsylvania. The LRC plan is no exception, as their plan takes what was a three county district and makes it a four county district. This is unnecessary, and while one county split is basically mandatory in this district due to population figures requiring at least one split in Crawford and Mercer Counties, and this district is the most reasonable to split since the incumbent lives in a small borough on the Crawford - Mercer border, there is no need to draw this into four different counties. Petitioners plan has this as a mainly Crawford County district, but a significant part of Northwestern Mercer County will be in the district as well. It remains as compact as possible, and eliminates two unnecessary county splits.

DISTRICT 18 -- Bucks County, Gene DiGirolamo (1995), seeking reelection. The LRC has this district as just Bensalem Township. While within the population deviation allowance to have this as just Bensalem Township, adding Hulmeville Borough brings this closer to the ideal population mean, and having Hulmeville Borough in the 18th instead of another district does not create a situation where another adjoining district is well below the median.

DISTRICT 19 -- Allegheny County, Jake Wheatley (2003), seeking reelection. Here we begin the Pittsburgh City districts and their ridiculous and unnecessary ward splits. The 2001 plan had this district encompass parts of a whopping 15 wards, 11 of them being split. In the LRC plan, it now encompasses parts of 14 wards, and splits 9 of them. This would only be acceptable if this were to create a majority-minority district in accordance with the Voting Rights Act, however, the district as drawn by the LRC maintains a white plurality amongst voting age population. We chose to keep this like the LRC as a minority crossover district, where about 33 percent of the population is non-white. By doing so, we also only had to split one ward, and it should be noted that this was the only ward we split in the entire City of Pittsburgh. It also becomes as geographically compact as possible, being centered along the Monongahela River and does not cross north of the Allegheny River.

DISTRICT 20 -- Allegheny County, Adam Ravenstahl (2010), seeking reelection. The LRC plan has 5 ward splits and an additional municipal split in addition to the required Pittsburgh City splits in Ross Township. There is no VRA requirement for these splits, and therefore all are unnecessary. Petitioners plan keeps the district primary north of the Ohio and Allegheny rivers, with the exception of Pittsburgh Ward 6, and contains 8 wards in Northwestern Pittsburgh as well as three suburban municipalities.

DISTRICT 21 -- Allegheny County, Dom Costa, (2009), seeking reelection. The LRC plan has 4 ward splits in the City of Pittsburgh, three municipal splits in the suburbs, and an additional 3 ward splits in O'Hara and Ross Townships. There is no VRA requirement for these splits, and therefore all are unnecessary. Petitioners plan has 2 wards in Pittsburgh, one in which the incumbent resides in, and 4 suburban municipalities.

DISTRICT 22 -- Currently Allegheny County, Both LRC and Petitioners plan moves to Lehigh County. Incumbent Martin Schmotzer (2012), defeated in primary. Both the LRC and Petitioners identified this as the district from Allegheny County to move and attempted to make this district as close to a majority Hispanic district as possible. LRC and Petitioners were able to create one in Reading City and an additional one in the City of Philadelphia to add to the existing one in the City of Philadelphia. Petitioners found it was not possible to do so, but we came very close, making this a 48.8% Hispanic district using Voting Age Population (VAP) as well as an over 55% general population district. This will likely, given current population trends in the area, become a majority-Hispanic district during the next decade. We will point out as well that the LRC split 5 wards in Allentown in the process and we split none, and we achieved a population closer to the ideal population mean than the LRC, making these splits unnecessary, as both the LRC and Petitioners plan make this currently a minority coalition district using VAP as defined by the VRA, as the African-American and Hispanic populations exceed 50% of VAP.

DISTRICT 23 -- Allegheny County -- Dan Frankel, seeking reelection. Petitioners plan has three complete wards and one small suburban borough, while the LRC needlessly split all three of these wards as well as a fourth split ward. None of these splits were necessary to comply with the VRA.

DISTRICT 24 -- Allegheny County. -- Joe Preston, defeated in primary. This is a majority African - American district as defined by the VRA. Petitioners were still able to draw this with no ward splits, encompassing 3 wards in the City of Pittsburgh and 3 suburban boroughs. The LRC split 4 wards and had a larger population deviation from the statistical mean than Petitioners plan.

DISTRICT 25 -- Currently Allegheny County, LRC has Allegheny County, Petitioners have Allegheny and Westmoreland Counties. Joe Markosek, seeking reelection. The additional county split was to maintain the borough of Trafford into one district. In most cases, when a municipality covers more than one county, we choose to split the municipality and not the county. We do not count this as a split, since it is necessary to either split the county or the municipality and therefore a split is unavoidable. In this case, it made sense due to the population of the district to include Trafford, both the Westmoreland and Allegheny County sections in one district.

DISTRICT 26 -- Currently Chester County, Both LRC and Petitioners Plan has Chester and Montgomery County. Tim Hennessey, seeking reelection. Both Petitioners and LRC saw the need to split this district over two counties. However, the LRC needlessly split Pottstown Borough into two districts, and even added an unnecessary ward split. Petitioners believe that this was a partisan move to dilute the minority and Democratic leaning populations in Pottstown Borough into two districts, which would otherwise be Republican leaning. As there is no legal justification to split Pottstown Borough, Petitioners kept it in one district. As for the county split, as both the Montgomery part and much of the Chester County part identifies their post office as "Pottstown", this is a better than average county split since it keeps the Pottstown community unified, even though it is spread amongst two districts.

DISTRICT 27 -- Allegheny County, Daniel Deasy, seeking reelection. Both LRC and Petitioners have very similar districts. Both split ward 19, due to its huge size, and both have several suburban municipalities. However Petitioners plan has a population closer to the ideal statistical mean.

DISTRICT 28 -- Currently Allegheny County, Petitioners have Allegheny County and Butler County, LRC has just Allegheny County. Mike Turzai, seeking reelection. The petitioners split is for one small borough on the Allegheny and Butler county borders in Butler County, because otherwise the district would be too small. This split is insignificant as most of this district is Allegheny County, and prevents other splits in other areas.

DISTRICT 29 -- Bucks County, Bernard O'Neill, seeking reelection. Petitioners draw a compact district that does not split Buckingham Township and unifies all three municipalities in the Centennial School District into one district, whereas the current 2001 plan has it split into three districts. The LRC needlessly splits Buckingham Township.

DISTRICT 30 -- Allegheny County, Randy Vulakovich, seeking reelection, but also running for State Senate. Petitioners plan has this district simply being four suburban Pittsburgh municipalities. By doing so, they achieve a population deviation from the ideal statistical mean of just 231 people. The LRC has two unnecessary municipal splits, and one ward split, and winds up having a larger population deviation.

DISTRICT 31 -- Bucks County, Steve Santasiero, seeking reelection. The LRC split's the borough of Morrisville by taking out Ward 4 and putting it into District 140. Since there is a portion of Falls Township that is separated from the rest of the township by the Borough of Morrisville, this would be a necessary split if you are dividing Morrisville and Falls Township. Petitioners put both Morrisville and Falls into District 140, so the split is not necessary. However, this district contains one of only three splits that are not mandated by either a municipality having a population above the upper limit for a district, or due to a contiguity issue combined with the resulting municipalities having a population above the upper limit for a district. In Bucks County, which fits nicely into 10 districts, the townships toward the lower end of the county have large populations.

Petitioners found that the combination of Bensalem Township and Hulmeville Borough fit nicely into one district represented by Gene DiGirolamo of District 18. Then, Bristol Township and Bristol Borough also fit nicely into one district, which is represented by Tina Davis in District 141. So following the Delaware River northward you would then get to District 140. The Representative is John Galloway, and he lives in Falls Township. As discussed earlier, Falls Township and Morrisville Borough must stay in the same district or there will be a required split to prevent a contiguity issue. Also, Tullytown Borough would need to be in this district as well due to it being enveloped by Falls Township. Adding these three municipalities together results in a district that is still too small, however, adding either of the two adjacent available municipalities, Middletown Township or Lower Makefield Township would result in a district that is too big, one or the other would have to be split. Since District 31 is represented by Steve Santasiero, a Lower Makefield Township resident, and the Ground Rules say to avoid splitting the home municipality of a sitting state rep that is running for reelection, the only other option is to then split Middletown Township. As for the apparent ward split in Middletown Township, petitioners believe that this does not count as a ward split. In most third class cities, boroughs, and first class townships in Pennsylvania, wards divide council districts. However, Middletown Township is a second class township without a home rule charter. Therefore, since there is no home rule charter, the Municipal Code applies and per the Municipal Code, Middletown Township is governed by a three or five member Board of Supervisors, (in this case five, as Middletown Township passed a referendum at some point in its history expanding its Board of Supervisors from three to five members). So therefore, there is no real legal subdivision, except to designate

geography, for the “Upper” and “Lower” districts, as they cannot be used to designate council districts, and thus, Petitioners do not believe the split in the “Lower” part of the district counts as a ward split for the purposes of counting ward splits in this petition. The district is as compact as possible, separating out only Langhorne and Langhorne Manor as Frank Farry of District 142 lives in Langhorne Borough.

DISTRICT 32 -- Allegheny County, Tony DeLuca, seeking reelection. Petitioners were able to achieve a population deviation from the ideal of just 903 and kept together several of these suburban Pittsburgh municipalities. The LRC splits two municipalities and creates a larger population deviation.

DISTRICT 33 -- Currently Allegheny County, Both LRC and Petitioners plan will be Allegheny and Westmoreland Counties. Frank Dermody (1991) seeking reelection. This district moved slightly eastward due to population shifts and this was recognized by both Petitioners and LRC. However, LRC splits 1 township and 1 ward, while Petitioners do not, and the population difference is negligible as a result..

DISTRICT 34 -- Allegheny County, Paul Costa (1999) seeking reelection. The LRC included a part of Pittsburgh, with 2 ward splits. Petitioners were able to achieve a population deviation very similar to LRC without having any splits in this district.

DISTRICT 35 -- Allegheny County, Mark Gergely (2003), seeking reelection. Again, the LRC has an unnecessary municipal split in West Mifflin Township, that Petitions did not

include in their plan and were able to maintain a population deviation closer to the ideal statistical mean.

DISTRICT 36 - -Allegheny County, Harry Readshaw, seeking reelection. This is another urban/suburban district in Allegheny County. The LRC again makes numerous unnecessary splits by splitting 4 of the 6 wards in the district and a suburban township. Petitioners were able to draw 4 complete wards in Pittsburgh and then 5 suburban municipalities and still maintain an acceptable population deviation.

DISTRICT 37 -- Lancaster County. Thomas Creighton, NOT seeking reelection. This district encompasses one of the three municipal splits that are required due to a contiguity issue that would cause a district to exceed the maximum range of population. In Lancaster County, the City of Lancaster's municipal borders are such that it causes portions of Manheim Township and Lancaster Township to be non-contiguous with the rest of the municipality. The LRC, while not drawing this district into Manheim Township, has a plan that splits all three of these municipalities in other districts. Since part of both Manheim Township and Lancaster Township must be connected to a part of Lancaster City, a representative whose district contains Lancaster City must therefore represent parts of both of these municipalities, and we did that in District 96. The LRC plan splits Lancaster Township and Manheim Township, however, doing so results in other splits in other parts of Lancaster County that wind up being unnecessary. Therefore, petitioners split Lancaster City and Manheim Township, and kept Lancaster Township in District 96. This district therefore gets moved southward, which is

acceptable because the incumbent is retiring, to encompass just two municipalities, the City of Lancaster, and all but district 7 of Manheim Township, which is the district enveloped by Lancaster City. Between this and District 96, two districts can represent the common interests of the people in these three municipalities, and avoid unnecessary splits in other parts of the county.

DISTRICT 38 -- Allegheny County. William Kortz, running for reelection. The LRC plan again makes numerous unnecessary splits in this district, by splitting South Park Township, Baldwin Borough, and West Mifflin Borough. Petitioners plan was able to achieve a mere 280 person deviation from the ideal statistical mean by including one ward in the City of Pittsburgh and six suburban boroughs, a far small deviation than the LRC plan.

DISTRICT 39 -- Allegheny and Washington Counties. Richard Saccone, running for reelection. Both LRC and Petitioners plan split this district amongst the two counties, which is necessary due to population issues and because the incumbent lives in a portion of Allegheny County that is adjacent to the Washington County border. However, petitioners achieve an almost ideal 20 person deviation from the ideal statistical mean and do not split any municipalities, while the LRC has an deviation over 100 times this amount and splits one borough and one township.

DISTRICT 40 -- Currently Allegheny and Washington Counties. LRC plan maintains Allegheny and Washington Counties, Petitioners plan has just Allegheny County. John

Maher, running for reelection and also running for Auditor General. The LRC plan has a larger population deviation and also contains just one municipality in Washington County in this otherwise Allegheny County based district. The county split is unnecessary as Petitioners plan was able to keep the district entirely in Allegheny County with a smaller population deviation than the LRC plan.

DISTRICT 41 - Lancaster County. Ryan Aument, running for reelection. This district helps to demonstrate how not splitting Lancaster City causes a ripple effect of other municipal splits across Lancaster County, Here, the Petitioners plan keeps this district in five municipalities with no splits and still maintains a fairly compact district, while the LRC plan, has to split East Hempfield Township, Lancaster Township, Manheim Township, and West Hempfield Township. The Manheim Township split is necessary due to its contiguity issue, but the others are not, however, the LRC needlessly splits District 7 in Manheim Township into two districts, where we include it all in District 96.

DISTRICT 42 - Allegheny County. Matt Smith, running for reelection. Petitioners found that by combining two municipalities, Bethel Park and Mount Lebanon, that it fits nicely into one district with an acceptable population deviation. The LRC plan has a slightly small deviation but adds part of the City of Pittsburgh (complete with a ward split), and then splits Scott Township with two additional wards splits. All are unnecessary splits, and we like the fact that these two municipalities will have a united voice in one district, as opposed to an urban/suburban district that is centered in Mount Lebanon and has no other municipality that is close to its size in the district.

DISTRICT 43 -- Lancaster County. Scott Boyd, NOT running for reelection. Since the incumbent is not running for reelection this allows us to move this district slightly. By doing so we are able to achieve only an 827 person population deviation from the ideal and not splitting any municipalities. The LRC plan has a larger deviation and splits Lancaster Township.

DISTRICT 44 -- Allegheny County. Thomas Mustio, running for reelection. Both the Petitioners plan and LRC plan contain similar municipalities and neither has any municipal splits.

DISTRICT 45 -- Allegheny County. Nick Kotik, running for reelection. While Petitioners plan has this district slightly less compact than the LRC plan, it does so again by avoiding any splits, while the LRC plan splits Scott Township and splits two wards in it as well.

DISTRICT 46 -- Currently Allegheny, Beaver and Washington Counties, Petitioners maintain Allegheny, Beaver, and Washington Counties, LRC plan has just Allegheny and Washington County. Jesse White, running for reelection. Petitioners plan has an additional county split in this district than the LRC, but it was necessary to avoid splits in other counties and municipalities. The District is a mainly Washington County district and is currently represented by a Washington County resident. This keeps most of Northern Washington County united.

DISTRICT 47 -- Currently York County, Petitioners have York and Lancaster County, LRC has just York County. Petitioners avoid a municipal split in Springettsbury Township by crossing the Susquehanna twice and therefore create a district that is roughly half York and half Lancaster, and also achieve a smaller population deviation than the LRC plan.

DISTRICT 48 -- Washington County, Brandon Neuman, running for reelection. Both the LRC and Petitioners plans are similar, maintaining the district in Washington County centered around the City of Washington and making no municipal splits.

DISTRICT 49 -- Fayette and Washington Counties, Peter Daley, running for reelection. The Petitioners plan has this district include it almost entirely in Washington County, uniting the southern part of this county, and also avoiding an unnecessary county split in District 50. Neither plan has any municipal splits.

DISTRICT 50 -- Currently Fayette and Greene Counties. Petitioners plan maintains Fayette and Greene Counties, LRC plan has Fayette, Greene and Washington Counties. Currently vacant, previous office holder Bill DeWeese running for election. Petitioners treat this as an open seat because the previous elected State Representative has resigned upon his sentencing to prison, and therefore is still considered an open seat, despite the fact that he is running for reelection. However, the seat does not move much. It keeps all of Greene County intact in both plans. This results in a necessary county split in an adjacent county, as neither adjacent county is small enough to be split with Greene

County and remain in one district, however, the LRC splits this into three counties while Petitioners plan only splits this into Fayette and Greene, and therefore, eliminates this unnecessary split.

DISTRICT 51. Currently Fayette County, Both LRC and Petitioners plan has Fayette and Somerset Counties. Bill Mahoney, running for reelection. Both the LRC and Petitioners recognize the need to shift this district eastward due to the large population losses in Fayette County in the last 10 years. Both have similar municipalities in their plans, however Petitioners have a very close to ideal 172 person deviation from the ideal in their plan. The LRC plan has a slightly larger deviation.

DISTRICT 52. Currently Fayette County, Deborah Kula, running for reelection. LRC plan has Fayette County and Westmoreland County, Petitioners plan has just Fayette County. By moving District 51 slightly further east, and keeping District 49 almost entirely in Washington County, Petitioners avoid an unnecessary county split and keep this district entirely in Fayette County. The LRC manages not only to have this unnecessary split but also has an unnecessary municipal split in East Huntingdon Township in Westmoreland County.

DISTRICT 53. Montgomery County. Robert Godshall, running for reelection. This is the first district where the LRC and Petitioners plans exactly match. The population deviation is less than 1000 and no municipal splits are necessary.

DISTRICT 54. Currently Armstrong and Westmoreland Counties, LRC plan has Allegheny and Westmoreland Counties, Petitioners plan has just Westmoreland County. Eli Evankovitch, running for reelection. Petitioners eliminate an unnecessary county split and create a district entirely in Westmoreland County with a population deviation of just 48 from the ideal. The petitioners do split Hempfield Township into several districts. This is necessary, because the City of Greenberg is entirely contained within Hempfield Township, and due to the size of the combination of both of these municipalities together being above the threshold of the upper limit of a district, Hempfield Township must be split. However, this is still better than the LRC plan, which has a county split, and splits two municipalities and two wards within those municipalities.

DISTRICT 55. Currently Armstrong and Westmoreland Counties, Petitioners plan maintains Armstrong and Westmoreland Counties while LRC plan splits into Armstrong, Indiana, and Westmoreland Counties. Joseph Petrarca, running for reelection. Petitioners one county split is necessary only because Armstrong County is just barely above the maximum population for one district, and therefore this district contains just a small part of Armstrong County, while the vast majority of it is in District 60. While the LRC plan is closer to the ideal population mean, it does so by splitting an additional county unnecessarily, and also splits Unity Township in Westmoreland County unnecessarily. Petitioners District 55 hugs the northern part of Westmoreland County and therefore better represents similar interests with just a small part of Armstrong County.

DISTRICT 56. Westmoreland County. George Dunbar, running for reelection.

Petitioners create a district that is only 460 persons outside of the ideal statistical mean. Part of Hempfield Township, which was required to be split due to the issue with it enveloping the City of Greensburg, is included in this district, and therefore does not create a new municipal split. The LRC also splits Hempfield Township but has the additional unnecessary split of Penn Township, with an additional unnecessary ward split. Unfortunately, Petitioners displace the incumbent by eliminating this split. As this split has no legal justification other than to keep the incumbent in his home district, just as in Erie County, Petitioners believe that the incumbent may want to consider moving in order to continue to represent District 56. As no other Westmoreland County incumbent was retiring, this was necessary.

DISTRICT 57. Westmoreland County. Tim Kreiger, running for reelection. Both the LRC and Petitioners plan is similar as they both continue to have the necessary Hempfield Township municipal split, and both roughly encompass the same areas.

DISTRICT 58. Currently Fayette and Westmoreland Counties, LRC plan has just Westmoreland County, Petitioners plan has Westmoreland and Washington Counties. To prevent additional municipal splits in Westmoreland County, Petitioners chose to split this district in two counties. However, considering the winding Monongahela River creates large portions of either county to be separated from the rest of it, this split makes sense as it creates a Lower Monongahela Valley district . This also has one precinct in

the already necessarily split Hempfield Township, which is also split in the LRC plan, but the LRC also has an additional municipal split in East Huntingdon Township.

DISTRICT 59. Currently Fayette and Westmoreland Counties, LRC plan has Somerset and Westmoreland Counties, Petitioners plan has just Westmoreland County. Mike Reese, running for reelection. Petitioners swap the one county split in District 58 for this one, and by doing so, create a fairly compact Southeastern Westmoreland County district without having any municipal splits. The LRC plan split a county unnecessarily while including another part of the necessarily split Hempfield Township.

DISTRICT 60. Currently Armstrong and Indiana Counties, LRC plan has Armstrong, Butler and Indiana Counties, Petitioners plan has just Armstrong County. Jeff Pyle, running for reelection. Armstrong County, had it been just a little bit smaller, would have not been split at all and would have been contained entirely in District 60. There is no valid reason for the LRC to have any county splits, much less two. The citizens of Armstrong County are basically united in one district with Petitioners plan.

DISTRICT 61. Montgomery County. Kate Harper, running for reelection. Montgomery County is home of the other two municipal splits in Petitioners plan that are not necessarily required due to the municipality exceeding the upper limit of a district's population threshold or due to contiguity issues. As Petitioners plan does not have any Philadelphia district cross into the suburbs, and Bucks County fits nicely into 10 districts, all of these districts much either remain in Montgomery County or split into Chester,

Delaware, Berks, or Lehigh Counties. In Southeastern Montgomery County, we find that Springfield, Cheltenham and Jenkintown fit nicely into one district. Abington Township almost makes up an entire district, and Upper Moreland, Lower Moreland, Bryn Athyn and Hatboro almost make up one district. That leaves Upper Dublin as the odd township out, as it is too large to be included in any of these districts that cannot go any further south into Philadelphia or east into Bucks County, and therefore must be split. This district is the first to receive part of Upper Dublin, but we did not need to split any wards by doing so, as we give just Ward 1 to District 61. The LRC manages however to split two municipalities in their plan.

DISTRICT 62. Indiana County. Dave Reed, running for reelection. Both LRC and Petitioners plan keep this district in Northern Indiana County with no municipal splits.

DISTRICT 63. Currently Armstrong and Clarion Counties, LRC plan has Armstrong, Clarion, and Forest Counties, Petitioners have Butler and Clarion Counties. Donna Oberlander, running for reelection. Both plans contain all of Clarion County, the home of the incumbent and the largest part of the district. As it is not large enough for one district, an additional part of a county must be included. But the LRC plan manages to split two additional counties, including, ridiculously, Pennsylvania's smallest county in Forest County. The Petitioners have Forest County entirely in district 65 and have a part of Butler County in this district instead.

DISTRICT 64. Butler and Venango Counties, Scott Hutchinson, NOT running for reelection. Both LRC and Petitioners plan include all of Venango County and basically the same part of Butler County in this district, however Petitioners achieve a population deviation of just 697 persons from the ideal district, which is closer than the LRC plan.

DISTRICT 65. Currently Forest, McKean, and Warren Counties, LRC plan has Crawford, Forest and Warren counties, Petitioners plan has Erie, Forest, and Warren Counties. The current 2001 district has Forest and Warren counties entirely in this district. As McKean county can be placed entirely in one district, Petitioners chose to instead add part of Erie County, which already had to be split, and keep Forest and Warren counties wholly in this district. The LRC needlessly puts McKean county entirely in one district, which is proper, but needlessly splits Forest County.

DISTRICT 66. Currently Armstrong, Indiana and Jefferson Counties, LRC plan has Indiana and Jefferson Counties, Petitioners plan has Clearfield and Jefferson Counties. Sam Smith, running for reelection. Both LRC and Petitioners recognize that Jefferson County should continue to remain whole in this district. However, the LRC causes an unnecessary third split in Indiana County, which Petitioners have just in two districts, by including part of Indiana instead of neighboring Clearfield County. Petitioners also create a much smaller 672 person deviation from the ideal district by doing so.

DISTRICT 67. Currently Cameron, McKean and Potter Counties, LRC maintains Cameron, McKean and Potter Counties, Petitioners plan has Elk and McKean Counties.

Martin Causer, running for reelection. Both petitioners and the LRC see the ability to contain all of McKean County in this district, which is the home of the incumbent. But the LRC needlessly splits small Potter County which can fit nicely into District 68 along with Cameron and Tioga Counties, and therefore also needlessly splits Bradford County as well. Petitioners plan keeps all of McKean County and only has one split in Elk County, which is also split in the LRC plan.

DISTRICT 68. Currently Bradford and Tioga Counties, LRC plan has Bradford, Potter and Tioga Counties, Petitioners plan has Cameron, Potter and Tioga Counties. Matt Baker, running for reelection. Petitioners find that all of Cameron, Potter and Tioga Counties can fit nicely into this district with a smaller population deviation than the LRC plan. The LRC plan needlessly splits Bradford and Potter Counties in this district, while only keeping Tioga County whole.

DISTRICT 69. Currently Bedford and Somerset Counties, LRC plan maintains Bedford and Somerset Counties, Petitioners plan has just Somerset County. Carl Metzger, running for reelection. This district contains another needless split by dividing up Bedford County, which fits nicely along with Fulton County into District 78. Petitioners plan makes this entirely a Somerset County district represented by a Somerset County resident, and by not splitting Bedford County, unites all of Bedford County into one district represented by a Bedford County resident in District 78.

DISTRICT 70. Montgomery County. Matt Bradford, running for reelection. This district is much different from the LRC plan, as Petitioners believed that East Norriton, West Norriton, and Norristown Borough should be placed in District 150, as it had historically been, and as it would be very compact, give minorities the biggest voice of any district in Montgomery County, and also be the voice entirely of the Norristown Area school district. Therefore the incumbent, a Worcester Township resident, finds his district moving west and north rather than south into Norristown Borough. Petitioners believe that this handsome incumbent is up to the task of representing new areas, and also, these communities, mostly in the Methacton School District, are more similar in nature than the LRC plan. Plus, the LRC plan needlessly splits Plymouth Township.

DISTRICT 71. Currently Cambria County, LRC plan has Cambria and Somerset Counties, petitioners plan has just Cambria County. Bryan Barbin, running for reelection. The LRC needlessly splits county lines by including one small borough with a population just over 1,000 into this mainly Cambria County district. It was not needed to keep the population up in the LRC plan as it is already nearly 2,500 persons above the ideal mean. Petitioners maintain a compact district centered around the City of Johnstown without having to cross county lines.

DISTRICT 72. Currently Somerset and Cambria Counties, both LRC and Petitioners plan has just Cambria County. Both LRC and Petitioners plan has this district in suburban Johnstown without having to split municipalities or county lines and has roughly the same population deviation.

DISTRICT 73. Currently Cambria County, LRC plan has Cambria and Clearfield Counties, Petitioners plan has Cambria, Clearfield, and Indiana Counties. Gary Haluska, running for reelection. The LRC plan is odd as it needlessly displaces the incumbent, who is a Patton Borough resident and puts him into District 72. The petitioners plan splits this into three counties, but by doing so causes Indiana County to only be represented by 2 districts, and also Cambria County can maintain 2 complete districts inside of its borders.

DISTRICT 74. Currently Clearfield County, LRC plan is Chester County, Petitioners plan is York County. Camille George, NOT running for reelection. As indicated by the Ground Rules, both Petitioners and the LRC recognized the need to move this district due to population shifts from what Petitioners call the Southern Alleghenies region. The district numbers are just different. As petitioners already added a district in Chester County, this district is moved to York County, and is centered in the City of York. It becomes a minority crossover district with a nearly 40% African American and Hispanic population.

DISTRICT 75. Clearfield and Elk Counties. Matt Gabler, running for reelection. Both LRC and Petitioners plan have this in Clearfield and Elk Counties. Petitioners plan splits Elk County, but doing so prevents other unnecessary splits in neighboring counties and also maintain a smaller population deviation.

DISTRICT 76. Centre and Clinton Counties. Mike Hanna, running for reelection. The LRC and Petitioners are mainly in agreement as this district contains all of the incumbent's home of Clinton County and part of Centre County.

DISTRICT 77. Centre County. H. Scott Conklin, running for reelection. After district 171 moved from Philadelphia to Centre County, the Borough of State College was usually split between this district and District 171. In the last redistricting, when the Republican controlled LRC recognized the political need to thwart the more liberal and Democratic leaning borough of State College, and two Republican representatives represented the State College area, there were numerous needless splits in both districts made in order to accommodate the politics of both representatives. Now, the LRC plan has all of Democratic leaning State College Borough in this district, which is represented by Democrat H. Scott Conklin, who has been a Centre County commissioner as well as a candidate for Congress and Lieutenant Governor. Unfortunately, in order to draw all of State College into this district, two municipal splits had to be made to connect the incumbents Rush Township home in western Centre county to State College. Petitioners tried hard, but could not get both Rush Township and all of State College into one district without dividing a municipality or county. At the very least, the borough of Phillipsburg would have to be split into a mainly Clearfield County district, and would have to be separated from Rush Township. In addition, this would force District 171, which we have as an entirely Centre County district, to have at least one additional county split. As petitioners feel that this compact district centered around State College suits the needs of the residents of State College and Ferguson Township better than if it were to be divided,

and this division was only there to accommodate the incumbent, we must unfortunately displace Mr. Conklin into District 81, represented by Republican Mike Fleck. We think he would want to move into either the Borough of State College or Ferguson Township to continue representing the core of his constituents, but as the incumbent is a fierce campaigner he may fare well in his new Republican leaning district. Regardless, as there is no legal justification not to do so we unfortunately must displace him.

DISTRICT 78. Currently Bedford, Fulton and Huntingdon Counties, LRC plan has Bedford, Franklin and Fulton Counties, Petitioners plan has just Bedford and Fulton Counties. Dick Hess, running for reelection. Both LRC and Petitioners recognize that tiny Fulton County ought to go into one district and not be split. However, the LRC needlessly splits Bedford County, as it can be adjoined with Fulton and be contained in one district.

DISTRICT 79. Blair County. Richard Geist, defeated in primary. Both the LRC and Petitioners recognize that Blair County can nicely fit into two districts, and do not split the county any further. But LRC needlessly splits Allegheny Township in both of this and District 80. Petitioners plan does not and still maintains a reasonable population deviation from the mean.

DISTRICT 80. Blair County. Jerry Stern, running for reelection. As in District 79, both LRC and Petitioners have this as a Blair County district, but the LRC needlessly splits Allegheny Township and Petitioners do not.

DISTRICT 81. Currently Blair, Huntingdon and Mifflin Counties. LRC maintains Centre, Huntingdon and Mifflin Counties, Petitioners plan is just Centre and Huntingdon Counties. Mike Fleck, running for reelection. By keeping District 77 as just State College Borough and Ferguson Township, petitioners prevent additional needless splits in this district as well. The LRC needlessly splits tiny Mifflin County, which Petitioners put entirely in District 82. In addition, this district also had to split Ferguson and Patton Townships in Centre County to accommodate the incumbent in District 77 in the LRC plan and Petitioners did not.

DISTRICT 82. Currently Juniata, Mifflin, and Snyder Counties. Adam Harris, running for reelection. LRC plan has Franklin, Juniata, and Mifflin Counties and Petitioners plan has just Juniata and Mifflin Counties. Petitioners keep all of Mifflin County in this district but split Juniata County, while the LRC does the opposite. By doing so, petitioners prevent 2 county splits in both Districts 81 and 82 as the LRC does.

DISTRICT 83. Lycoming County. Rick Mirabito, running for reelection. Both the LRC and petitioners create a Williamsport based district. Petitioners plan has the district slightly more compact than the LRC plan.

DISTRICT 84. Currently Lycoming County. LRC plan has Lycoming and Union County. Petitioners plan has Lycoming and Sullivan County. Garth Everett, running for reelection. Due to a slight population loss, Lycoming County is now too small for 2 complete House districts. LRC plan has the suburbs of Williamsport along with two

municipalities in Union County. Petitioners keep Sullivan County intact and avoid another county split by combining tiny Sullivan County with this district. Therefore the counties of Lycoming and Sullivan are represented in two complete districts without the need for another county split.

DISTRICT 85. Currently Snyder and Union Counties, LRC plan maintains Snyder and Union counties, Petitioners plan has Juniata, Perry, and Snyder Counties. Fred Keller, running for reelection. In keeping with our Ground Rules, we keep this district containing all of Snyder County, the home county of the incumbent. By doing so, we avoid both the needless split of Snyder County as well as the needless split of Union County, which we include in District 108. We do split Juniata County in another district, but this is done to prevent the splits of several other counties. Petitioners District 85, although it stretched over three counties, is more compact than the LRC plan.

DISTRICT 86. Cumberland and Perry Counties. Mark Keller, running for reelection. LRC keeps Perry County as a whole but Petitioners split it in this district, however by doing so, Petitioners keep the Shippensburg area as a whole in District 15 as well as Silver Spring Township in District 87. In addition, Petitioners district 86 has a lower population deviation than the LRC plan.

DISTRICT 87. Cumberland County. Glen Grell, running for reelection. LRC splits Silver Spring Township unnecessarily while Petitioners keep it whole in this district.

DISTRICT 88. Currently Cumberland County, LRC maintains Cumberland County, Petitioners have Cumberland and York Counties. Sheryl Delozier, running for reelection. As a consequence of avoiding a municipal split in Dauphin County in District 103, Petitioners plan has that district crossing the Susquehanna River into Cumberland County. This has the consequence of pushing District 88 further south into York County. However, by doing so, it keeps the similar communities of Upper and Lower Allen Township (where the incumbent lives) and Mechanicsburg in one district and also creates a district with a mere 358 person deviation from the ideal.

DISTRICT 89. Currently Franklin and Cumberland Counties, Both LRC and Petitioners plan has just Franklin County. Rob Kaufmann, running for reelection. Both LRC and Petitioners draw a compact district entirely in Franklin County that has a population close to the ideal with no splits. However, as mentioned previously, petitioners keep the Borough of Shippensburg whole by including it in District 15, and thus do not split this municipality like the LRC plan.

DISTRICT 90. Franklin County. Todd Rock, running for reelection. Both LRC and Petitioners draw a district entirely in Franklin County without any municipal splits.

DISTRICT 91. Currently, Adams and Franklin Counties. Both LRC and Petitioners plan has just Adams County. The 2001 map had two divisions in two townships in this district, which was probably done needlessly. Both LRC and Petitioners are able to draw a compact district entirely in Adams County.

DISTRICT 92. Currently Cumberland and York Counties, LRC maintains Cumberland and York Counties, Petitioners have Dauphin and York Counties. Scott Perry, NOT running for reelection. As a consequence of the incumbent not running for reelection, Petitioners are able to put his township in another district and therefore able to draw a mostly Northern York County district that is more compact and also takes in a small part of Dauphin County, needed to prevent several municipal splits in that county.

DISTRICT 93. York County. Ron Miller, running for reelection. Both Petitioners and LRC draw a similar district entirely in York County without having to split municipalities.

DISTRICT 94. York County. Stanley Saylor, running for reelection. LRC has an unnecessary split in Springettsbury Township which Petitioners eliminate by including it in whole in this district.

DISTRICT 95. York County. Eugene DePasquale, running for reelection and also running for Auditor General. In this district, Petitioners do not displace DePasquale, who is a West Manchester Township resident, however, he will find his district radically different as the City of York was placed into District 74. The LRC made an unnecessary split by including his precinct in West Manchester Township and connecting it with York City, in order to help maintain the Democratic leaning district as DePasquale as its representative. Petitioners cannot find a legal justification other than to accommodate the

incumbent to do this. Therefore, Petitioners wish DePasquale well with his bid for Auditor General, but if he comes up short, he would have the choice to run for the seat in his hometown, which would be very different, and more Republican, or move to the new open seat moved from Clearfield County which would be more Democratic.

DISTRICT 96. Lancaster County. Mike Sturla, Running for reelection. As mentioned previously, petitioners avoid splits in Lancaster Township as well as several other districts in Lancaster County, and avoid a precinct split in Manheim Township by splitting Lancaster City, as a representative who has Lancaster City must represent all of Lancaster Township to avoid a split, and also part of Manheim Township due to a contiguity issue. The LRC plan splits both Lancaster Township and Manheim Township and splits District 7, which results in Manheim Township and Lancaster Township being split into three districts. The petitioners plan avoids both of these splits.

DISTRICT 97. Lancaster County. John Bear, running for reelection. The LRC plan contains the rest of Manheim Township in this plan which we include in District 37. As mentioned, Manheim Township is only split into two, rather than three districts in the Petitioners plan and also maintains a smaller population deviation than the LRC plan.

DISTRICT 98. Currently Dauphin and Lancaster Counties, LRC plan maintains Dauphin and Lancaster Counties, Petitioners plan has Lancaster, Dauphin, and Lebanon Counties. Dave Hickernell, running for reelection. Lebanon County has a population just over the threshold for 2 districts, which both LRC and Petitioners include in Districts 101 and 102.

Petitioners chose to have this district encompass parts of three counties, and in doing so, made it more compact by having the district as Northern Lancaster, Southern Dauphin, and Southwestern Lebanon. This also prevents any county split in District 104, as the LRC plan has.

DISTRICT 99, Lancaster County. Gordon Denlinger, running for reelection. Both LRC and Petitioners plan draw this as an Eastern Lancaster County district with no municipal splits.

DISTRICT 100. Lancaster County. Bryan Cutler, running for reelection. The LRC needlessly splits Lancaster Township yet again in this district which is prevented by keeping all of Lancaster Township in District 96. The Petitioners plan splits no municipalities while keeping a slightly smaller population deviation.

DISTRICT 101. Lebanon County. Mauree Gingrich, running for reelection. The LRC and Petitioners keep this district entirely in Lebanon County with roughly the same boundaries.

DISTRICT 102. Lebanon County. RoseMarie Swanger, running for reelection. As in District 101, the LRC and Petitioners keep this district entirely in Lebanon County with roughly the same boundaries.

DISTRICT 103. Currently Dauphin County, LRC remains Dauphin County, Petitioners have Dauphin and Cumberland County. Ron Buxton, NOT running for reelection. The LRC, as is in the current 2001 plan, split Swatara Township to connect the City of Harrisburg to the Borough of Steelton. Unfortunately, this district will require either a municipal or county split because the City of Harrisburg is too small for one district alone, and all the adjoining townships in Dauphin County are too large to add to the City of Harrisburg without making a municipal split, except for the Borough of Pennbrook, which we add to this district. Therefore, Petitioners jump the Susquehanna River to add two small suburban Cumberland County boroughs. This move prevents another county split in northern Dauphin County in District 104. The District remains a minority coalition district as is in the current 2001 plan and the LRC plan.

DISTRICT 104. Currently Dauphin County, LRC has Dauphin and Lebanon County, Petitioners have just Dauphin County. Sue Helm, running for reelection. The county split in District 103 resulted in preventing the need for a county split here, and also prevented the additional split in Swatara Township. The result is an all Dauphin County district, centered in the incumbent's hometown of Susquehanna Township, without making any municipal splits.

DISTRICT 105. Dauphin County. Ron Marsico, running for reelection. Both the LRC and Petitioners have a three municipality all Dauphin County district. Petitioners achieve close to the ideal population deviation at 152.

DISTRICT 106. Dauphin County. John Payne, running for reelection. Both Petitioners and LRC create an all Dauphin County district, however LRC continues the unnecessary municipal split by splitting the Township of Swatara again in this district.

DISTRICT 107. Currently Columbia, Montour, and Northumberland Counties, LRC maintains Columbia, Montour, and Northumberland Counties, while Petitioners have just Montour and Northumberland Counties. Kurt Masser, running for reelection.

Petitioners avoid a county split by having almost all of Columbia County in District 109, while both LRC and Petitioners keep all of tiny Montour County in this district.

Petitioners also achieve a near ideal population deviation of 266, while the LRC, in part because of the unnecessary additional county split, go above the ideal by over 2,000.

DISTRICT 108. Currently Northumberland and part of Snyder County, LRC maintains Northumberland and Snyder Counties, Petitioners have Northumberland and Union Counties. Lynda Schlegel-Culver, running for reelection. The LRC split both counties in this district while Petitioners keep Union County whole while keeping the home of the incumbent in Rockefeller Township in this district.

DISTRICT 109. Columbia County. David Millard, running for reelection. Both LRC and petitioners keep this district encompassing most of Columbia County with roughly the same municipalities and no municipal splits.

DISTRICT 110. Currently Bradford, Sullivan, and Susquehanna Counties, LRC maintains Bradford, Sullivan and Susquehanna Counties, Petitioners have just Bradford County. Tina Pickett, running for reelection. Bradford County, with its population of 62,622, has an almost perfect population to fit in one district, being only 49 people from the ideal statistical mean. The LRC needlessly divides this district into three counties and splits Bradford County, which is also home of the incumbent, and creates a near 2000 person deviation from the mean by doing so. There is absolutely no legal justification that the LRC has to do this. The LRC includes all of Sullivan County, but Petitioners include that in its entirety in District 84.

DISTRICT 111. Currently Susquehanna, Wayne, and Wyoming Counties, LRC has Susquehanna, and Wayne Counties, Petitioners have Lackawanna, Susquehanna and Wayne Counties. Sandra Major, running for reelection. Petitioners add an additional county split to prevent an additional county split in district 117, and also keeping Susquehanna County whole, which the LRC splits with District 110. Petitioners also draw a compact district, encompassing all of Susquehanna, Northern Wayne and extreme Northern Lackawanna with a population deviation from the mean of only 582 persons.

DISTRICT 112. Lackawanna County. Kenneth Smith, defeated in primary. Both LRC draw this as a urban/suburban district as Scranton needs to be split due to its size. But the LRC adds a needless ward split by splitting ward 19, which Petitioners include entirely in District 114.

DISTRICT 113. Lackawanna County, Kevin Murphy, defeated in primary. This is another example of an urban/suburban district, which encompasses part of Scranton and the suburbs. But Petitioners avoid a ward split yet draw a district only 338 persons away from the ideal mean, better than the LRC's nearly 2000 person deviation.

DISTRICT 114. Lackawanna County, Sid Michaels Kavulich, running for reelection. Petitioners draw this as an urban/suburban district while the LRC draws this as only a suburban district. But by not splitting Scranton twice they cause a ward split in both Districts 112 and 113 and a larger population deviation in Districts 113 and 114 than Petitioners plan.

DISTRICT 115. Currently Lackawanna and Wayne Counties, Both LRC and Petitioners move district to Monroe County. Ed Staback, NOT running for reelection. While in the same region, Lackawanna County has lost population while Monroe County gained population in the last 10 years. This shift necessitates the move within the region of one district based in Lackawanna to Monroe. Petitioners and LRC draw similar districts, but the LRC needlessly splits Stroud Township, putting its 7th division with a population of 699 in a different district.

DISTRICT 116. Luzerne County. Tarah Toohil, running for reelection. The LRC needlessly split the Township of Hazle including only the spacious but sparsely populated District 1 and putting the rest in District 119. Petitioners believe that this district should remain as compact as possible as a wholly Greater Hazleton district, and Petitioners plan

has a small population deviation from the mean of 449. Petitioners feel that the incumbent is sufficiently skilled and charming enough to do well in this urban/suburban swing district for years to come without needless municipal splits.

DISTRICT 117. Currently Columbia, Luzerne and Wyoming, LRC draws Lackawanna, Luzerne and Wyoming, Petitioners have just Luzerne and Wyoming. Karen Boback, running for reelection. By adding an additional county split in District 111, Petitioners prevent this second split in this district. Both petitioners and LRC include all of tiny Wyoming County in this district. By doing so Petitioners also created a smaller population deviation of 733 than the LRC.

DISTRICT 118. Currently Luzerne and Monroe Counties, both LRC and Petitioners have Lackawanna and Luzerne Counties. Michael Carroll, running for reelection. Petitioners and LRC both create a district of mostly Eastern Lackawanna and Northern Luzerne Counties. Petitioners achieve a slightly better population deviation at 462 than the LRC.

DISTRICT 119. Luzerne County. Gerald Mullery, running for reelection. The LRC needlessly splits both Hanover and Hazle Township in this district. Petitioners give Hazle Township to the greater Hazleton area district 116, and keeps all of Hanover Township in this district. Petitioners also create a district with a population deviation from the ideal at 434 persons.

DISTRICT 120. Luzerne County. Phyllis Mundy, running for reelection. Both Petitioners and the LRC create similar districts in the Northern suburbs of Wilkes-Barre with no splits and similar population deviations.

DISTRICT 121. Luzerne County. Eddie Day Pashinski, running for reelection. Both Petitioners create a Wilkes-Barre based district, but the LRC needlessly splits Hanover Township by including one ward in District 119.

DISTRICT 122. Carbon County. Doyle Heffley, running for reelection. Both LRC and Petitioners keep this a wholly Carbon County district, but the LRC needlessly takes one small borough out of this district and therefore splits Carbon County between Districts 122 and 124. Carbon County has a population within the deviation as defined in the Ground Rules and therefore should remain entirely in this district.

DISTRICT 123. Currently Schuylkill County, LRC maintains Schuylkill County, Petitioners have Columbia, Northumberland, and Schuylkill Counties. Neil Goodman, running for reelection. Petitioners stretch this district across three counties to keep other counties whole and prevents additional splits in Districts 125 and 128. The district remains primarily a Northern Schuylkill County district in both plans.

DISTRICT 124. Currently Berks and Schuylkill Counties, Petitioners maintain Berks and Schuylkill Counties, while LRC has Berks, Schuylkill, and Carbon Counties. Jerry Knowles, running for reelection. These are similar districts in both plans except the LRC

needlessly adds one municipality in Carbon County into this district. Petitioners maintain a slightly smaller population deviation than the LRC.

DISTRICT 125. Currently Berks and Schuylkill Counties, LRC has Dauphin and Schuylkill Counties while Petitioners have just Schuylkill County. Michael Tobash, running for reelection. By creating the splits in District 123 and also in District 92, Petitioners plan eliminated the need for an additional split in this district. In addition, the LRC split of the Democratic leaning City of Pottsville is wholly political and unnecessary, as the Republican incumbent is a Pottsville resident but removed the Democratic leaning parts of the City into District 123.

DISTRICT 126. Berks County. Dante Santoni, NOT running for reelection. Had the incumbent been running for reelection, there would have needed to be a ward split to separate him from Tom Caltagirone in District 127, and unlike in the City of Erie, it would be legally justifiable to do so as District 127 is becoming a majority Hispanic district per the VRA. However, as he is not running for reelection we are able to move this district slightly more into the suburbs, and by doing so, avoid the ridiculous three ward splits in the City of Reading, which were not necessary to create the majority Hispanic district in District 127.

DISTRICT 127. Berks County. Tom Caltagirone, running for reelection. This district becomes one of the 2 additional majority Hispanic districts in Pennsylvania in accordance with the VRA. However, the LRC needlessly did so by splitting 4 wards while

Petitioners split none and even created a good population deviation of just 751 persons in the process.

DISTRICT 128. Currently Berks County. LRC has Berks and Lancaster Counties, while Petitioners have just Berks County. Mark Gillen, running for reelection. LRC needlessly splits Exeter Township and also includes one municipality in Lancaster County, and has a larger population deviation than Petitioners plan. This was done only for political purposes, as they are trying to protect a Republican incumbent in a Democratic leaning district by excluding Democratic leaning parts of Exeter Township and including a heavily Republican township in Lancaster County. Both splits are unnecessary as demonstrated by Petitioners' plan.

DISTRICT 129. Currently Berks County. LRC has Berks and Lancaster Counties, while Petitioners have just Berks County. James Cox, running for reelection. Once again, LRC needlessly splits counties in an attempt to improve the reelection chances of a Republican incumbent by including a couple of heavily Republican municipalities in an otherwise swing district. Petitioners do not see any legal justification to do this and keep the district entirely in Berks County.

DISTRICT 130. Berks County. David Maloney, running for reelection. Again, the LRC needlessly divides Exeter Township to create this district, which has no justification other than politics. Petitioners create a district with an acceptable population deviation from the mean without this split.

DISTRICT 131. Currently Lehigh County, LRC plan has Lehigh, Montgomery, and Northampton Counties, Petitioners retain just Lehigh County. Justin Simmons, running for reelection. As we start getting into more of the Lehigh Valley and Southeastern Pennsylvania districts, we begin to see a pattern of the LRC needlessly splitting townships, boroughs, cities, and counties for no good reason other than politics, and certainly no reason that the Pennsylvania Constitution recognizes. The City of Allentown must be split due to size, and the current District 131 has a portion of the City of Allentown. But the LRC wanted to make the district more Republican for freshman incumbent Justin Simmons, so it removed the City of Allentown, which of course did not help eliminate splits in the city as it would be impossible to do so, split two counties, and split Salisbury Township in Lehigh County, complete with a ward split, and also Lower Saucon Township in Northampton County. All of these splits are completely and utterly unnecessary as Petitioners create a compact district that remains entirely in Lehigh County with a smaller population deviation than the LRC plan.

DISTRICT 132. Lehigh County. Jennifer Mann, NOT running for reelection. As the incumbent is not running for reelection, the Petitioners move this district slightly northward to eliminate splits. The results is a very compact district that contains one ward in Allentown and Whitehall and South Whitehall township. The LRC plan needlessly splits 4 wards and one municipality in an attempt to pack Democratic voters into this previously most Democratic district in Lehigh County.

DISTRICT 133. Currently Lehigh and Northampton Counties, LRC creates just Lehigh County, Petitioners maintain Lehigh and Northampton Counties. Joe Brennan, running for reelection. If there ever was a place to have county splits, it would be between Lehigh and Northampton Counties, as the City of Bethlehem is the largest municipality in Pennsylvania to encompass two counties. As it needs to be split due to both size and the fact that it is in two counties, to have county splits here is not as offensive as in other parts of the state. The incumbent lives in a borough that borders the Lehigh/Northampton County border, and it made sense to include this plus the majority of both the Lehigh and Northampton County portions of the City of Bethlehem in this district. Therefore, residents of the City of Bethlehem get its strongest voice possible in District 133. The LRC plan, while it doesn't split counties, does split the City of Bethlehem and also splits two municipalities, and separates Catasaqua from North Catasaqua, which is the hometown of Julie Harhart of District 183. Also, petitioners create a population deviation of just 382 persons.

DISTRICT 134. Lehigh and Berks Counties. Ryan Mackenzie (special, 2012) running for full term. The Petitioners count districts that had a special election the same as an open seat in determining whether to move a district. In this case, the incumbent lives in South Whitehall Township, and the LRC had to redraw this district to include him, and by doing so split a municipality as well as a second municipality. Petitioners do not believe there is any Constitutional requirement to redraw a district in the middle of the

redistricting process to accommodate an incumbent who won a special election, and therefore, unfortunately Mr. Mackenzie gets displaced into District 132 and this effectively becomes an open seat, and Petitioners make no municipal splits.

DISTRICT 135. Northampton County. Steven Samuelson, running for reelection. This district encompasses the remainder of the City of Bethlehem as well as Bethlehem Township and two other small suburban municipalities. By doing this, and creating the split in District 133, we prevent any unnecessary municipal splits, like the LRC did by splitting Bethlehem Township and even adding an unnecessary ward split.

DISTRICT 136. Northampton County. Robert Freeman, running for reelection. Petitioners are able to create this Easton area district with a population deviation from the mean of just 395 persons without splitting any municipalities. The LRC splits two townships needlessly and creates a larger population deviation in the process.

DISTRICT 137. Northampton County. Joe Emrick, running for reelection. Again, petitioners are able to keep this district entirely in Northampton County without having to split any municipalities, while the LRC splits Palmer Township.

DISTRICT 138. Currently Northampton County, LRC maintains Northampton County, Petitioners have Northampton and Monroe Counties. Marcia Hahn, running for reelection. The LRC and Petitioners create districts almost equal in population. While Petitioners elect to split this into Monroe County, it prevents needless municipal splits in

Moore Township and Bethlehem Township, complete with a ward split in that municipality.

DISTRICT 139. Pike and Wayne Counties, Michael Peiffer, running for reelection. Pike and Wayne Counties are just under the lower threshold of population for a district. As they are growing, it's very possible that in the next round of redistricting they will both get their own district. But for now, both have to be split, and both have to be split twice due to the fact that combined they greatly exceed the totals for 1 district, unlike other counties in the state. The LRC and Petitioners both recognize this and create similar districts in parts of both counties.

DISTRICT 140. Bucks County. John Galloway, running for reelection. The Borough of Bristol was historically in this district as the previous representative, Tom Corrigan, and his predecessor, John Cordisco, were both Bristol Borough residents. Now that the incumbent lives in Falls Township, there is now no need to separate Bristol Township from Bristol Borough. Additionally, in order to keep Bristol Borough in the 140th you must split Bristol Township due to a contiguity issue. In addition, the LRC splits Morrisville Borough in an attempt to help Steve Santarsiero get a more Democratic district, which can be achieved legally by just splitting Middletown Township, which had to be split due to the discussion we raised in the District 31 commentary. Thus, the Petitioners only split Middletown, and avoid splits in Bristol Township and Morrisville Borough.

DISTRICT 141. Bucks County. Tina Davis, running for reelection. As mentioned previously, there is no legal justification to include Bristol Borough in District 140. Bristol Township and Bristol Borough fit nicely into this district, and represent citizens of common interest much more than the highly gerrymandered LRC 141st, which splits Bristol Township, Middletown Township, and includes two small boroughs, all unnecessary splits.

DISTRICT 142. Bucks County. Frank Farry, running for reelection. The LRC splits Middletown Township, which as mentioned is necessary, but splits it into three districts instead of two like the Petitioners plan. The incumbent lives in Langhorne Borough, which is contiguous to Northampton Township. While Northampton Township has been entirely in the 178th since the district moved from Philadelphia after the 1981 redistricting, this was kept this way due to the previous incumbent, Roy Reinard, being a Northampton Township resident. As the new incumbent in the 178th, Scott Petri, lives in the Northern part of Upper Makefield Township on the foot of Jericho Mountain, there is no reason why Northampton Township must remain in the 178th, and therefore petitioners include it into the 142nd instead. It also becomes a district that encompasses just two school districts, Council Rock and Neshaminy, as opposed to including Upper Southampton and Centennial School District, which is wholly included in the 29th district in the petitioners plan.

DISTRICT 143. Bucks County. Marguerite Quinn, running for reelection. Both LRC and Petitioners create a similar Central and Northern Bucks County district, however, the LRC splits Buckingham Township which is included entirely in the 178th in the Petitioners plan and thus this split is unnecessary.

DISTRICT 144. Bucks County. Katherine Watson, running for reelection . LRC and Petitioners create similar districts in the Western part of Bucks County, with the incumbent's home town of Warrington Township being the largest municipality in both versions.

DISTRICT 145. Bucks County. Paul Clymer, running for reelection. Again, LRC and Petitions create similar districts in the Northwestern part of Bucks County, centered around Quakertown, and both do so without any municipal splits.

DISTRICT 146. Montgomery County. Tom Quigley, running for reelection. The LRC continues the unnecessary and partisan split of Pottstown Borough, as the other part of it is in this district. Petitioners draw a district slightly closer to the ideal population mean without this needless split.

DISTRICT 147. Montgomery County. Marci Toepel, running for reelection. Both LRC and petitioners draw a district in Upper Montgomery County that hugs the Berks County border. However, as the LRC had the needless split in District 131, this district also encompasses that area of far Northern Montgomery County.

DISTRICT 148. Montgomery County. Mike Gerber, running for reelection. We begin here to discuss the third and final municipal split in the entire map that is not absolutely mandated by population or contiguity. But before we do that, we are going to point out that Lower Merion will finally get its own district in our plan. In the 1991 redistricting plan, Lower Merion was divided into two districts in the 148th and 149th. In the 2001 redistricting plan, it was divided again into three districts in the 148th, 149th, and 194th. Now, the 2012 LRC plan has Lower Merion into four districts in the 148th, 149th, 194th, and now 166th. The 194th and 166th result in two additional unnecessary county splits. This was done purely for partisan purposes. Lower Merion is probably the most affluent township in all of Pennsylvania that also is overwhelmingly Democratic. Indeed, Barack Obama received 70% of the vote in 2008 in Lower Merion. As a result of this, Lower Merion, with the exception of perhaps the 17th Senatorial District, has been sliced up in the Pennsylvania House map and thrown about in the Congressional map to try to dilute both its fundraising capabilities as well as its overall political might. This is a travesty that should not continue. Lower Merion along with Narberth Borough, and optionally West Conshohocken Borough, fit nicely into one district. When going over the Ground Rules, since we have no districts that overlap from Philadelphia into the suburbs, Delaware County winds up losing a district, and Montgomery County gains one. We assign this as District 161 for several reasons which we will discuss when we arrive at that district. But for now, we are at District 148, and we are removing all of Lower Merion Township from this as well as every other district that divides it. The incumbent is a Whitpain Township resident and we keep all of Whitpain Township in this district, the LRC divides it between the 61st and 148th. The only other split that winds up being

necessary is in Upper Gwynedd, as there is no real way to keep every incumbent in their districts without dividing one more municipality in Montgomery County besides Upper Dublin Township. Now, we are aware that the original Amanda Holt map does only have one municipal split in Montgomery County. (This was written of course before the filing of her potential new petition) However, this is because she has other municipal splits in Delaware County that we avoid, and also, she displaces numerous representatives out of their own districts. We are also aware that the Pennsylvania Constitution does not guarantee that a district stay in a particular area to benefit the sitting representative. But we also believe that the Court does not want to create chaos by displacing representatives and creating open seats in many areas and primary or general election fights between incumbents in other areas. We displace only three representatives in our entire map, with Pat Harkins, George Dunbar, and H. Scott Conklin. Amanda Holt's original map displaced 39, and we find this unacceptable and unreasonable. So therefore, this municipal split we find to be necessary and reasonable. In any case, the LRC manages to split Lower Merion (complete with a ward split), Plymouth Township, and Whitpain Township in this district, and as we discuss, only one split is really necessary.

DISTRICT 149. Currently Montgomery County, LRC maintains Montgomery County, Petitioners have Montgomery and Delaware Counties. Tim Briggs, running for reelection Just like in the 26th, we find that this county split is reasonable for a few reasons. First, we are avoiding the multiple additional splits that the LRC has in the 152nd, 194th, 166th, and 131st and only have two splits of Montgomery County, one in the 26th (which is also included in the LRC plan) and this one, which the LRC does not

include. By doing so however we are able to create a second primarily “Main Line” district, by uniting Upper Merion Township, home of the King of Prussia Mall which bankrupts many unsuspecting young men trying to please their wives with their high end jewelry and designer boutiques, and Radnor Township, which previously was sliced into several districts of representatives that lived nowhere near Radnor Township, with the exception of perhaps Greg Vitali. Finally, just like Lower Merion, Radnor gets to be united in one district, and we believe that it has similar interests as residents in Upper Merion. We add Bridgeport Borough to even out the population, as adding it to the 150th would create an overweight district. The LRC plan, while not splitting this particular district’s county lines, splits Lower Merion again, and also West Norriton, which we unite in the 150th.

DISTRICT 150. Montgomery County. Mike Vereb, running for reelection. The incumbent is a West Norriton resident. This is great because this means we can finally unite the three municipalities of the Norristown Area School District into one district, West Norriton, East Norriton, and Norristown Borough. Previously, all three municipalities in this district were divided between the 150th and the 70th. That is no longer the case with our plan. We create a compact district with no municipal splits and also create a district of citizens with similar interests. The LRC needlessly splits Upper Providence and the incumbents’ hometown of West Norriton, and creates a district with a larger population deviation than Petitioners’ plan.

DISTRICT 151. Montgomery County. Todd Stephens, running for reelection. This district will have the remainder of Upper Gwynedd in it. This is still far better than the LRC plan, which splits Lower Gynedd, which is the hometown of Kate Harper of the 61st District, and also Upper Dublin, complete with 2 ward splits, and our District 151 has a population closer to the ideal as well.

DISTRICT 152. Currently Montgomery and Philadelphia Counties, LRC maintains Montgomery and Philadelphia Counties, Petitioners have just Montgomery County. As this is the first district that in the LRC plan crosses into Philadelphia, we will now comment onto our plan and districts that overlap into Philadelphia. Philadelphia can fit, using the upper and lower ranges of our districts in the Ground Rules, into either 24 or 25 districts without having to be split into other counties. Currently however, 26 districts are based in Philadelphia and are represented by Philadelphia residents. Additionally, a small part of the current 152nd and one division of the current 154th cross from Montgomery County into Philadelphia. Also, a small part of the 170th, 185th, 191st and 194th cross into Montgomery and Delaware Counties. We believe that Philadelphia residents are served better by representatives that only represent Philadelphia. It is unique as it is the only first class city and is by far has the largest population of any municipality in Pennsylvania. Since it does not need to be divided, we keep 24 districts entirely in Philadelphia. We could have drawn 25, but that would mean another part of the state would not get a needed district. We therefore had to move two, and we chose the 169th and 195th due to the fact that the 169th lost the most population of any non minority-majority district in Philadelphia, and the 195th because of the retirement of

Frank Oliver. But going back to the 152nd, the LRC splits Upper Dublin, which we do as well, but then crosses over into the 63rd Ward in Philadelphia. As this is a municipal split, a county split, and the 63rd Ward is the home ward of Kevin Boyle of the 172nd District, we find this unnecessary. It was done to help the incumbent pick up some additional Republican voters as that part of the 63rd ward is amongst the most Republican leaning in an otherwise overwhelmingly Democratic city. But it doesn't do either the Philadelphia residents of the 152nd or the citizens of the district as a whole any service by doing so, and that's why we avoid this unnecessary split.

DISTRICT 153. Montgomery County. Madeline Dean (2012, special), seeking a full term. This has always been an Abington based district, and both LRC and Petitioners keep it so. However, the LRC has a needless split in a ward in Upper Dublin, which can be eliminated by including Rockledge Borough, a municipality in the Abington School District, into this district instead of the 172nd, which also avoids a needless county and municipal split in that district.

DISTRICT 154 -- Montgomery County. Larry Curry, NOT seeking reelection. We come to the second district so far that both LRC and Petitioners match exactly. Cheltenham, Springfield, and Jenkintown fit nicely into this one district, and it is also the only district in Pennsylvania that remains exactly the same from the 2001 reapportionment.

DISTRICT 155 -- Chester County. Curt Schroeder, NOT seeking reelection. Since the incumbent is not seeking reelection, this gives us the ability to move this district slightly.

This allows us to avoid the split of Democratic leaning Phoenixville Borough, which was done to dilute the votes of that borough into two otherwise swing districts in Chester County.

DISTRICT 156 -- Currently Chester County, LRC remains Chester County, Petitioners have Chester and Delaware Counties. Dan Truitt, seeking reelection. The LRC creates a district that does not cross the county border. However, Birmingham Township has a piece of it that is separated, due to a bend of the Brandywine Creek in and out of Delaware, from the rest of the Township by Chadds Ford Township, which is in Delaware County. There are no residents of the separated part of Birmingham Township, but we believe that, at least in theory, since there could be residents there at some point in the future, that this district as drawn by the LRC is not contiguous. Therefore, we believe this county split is necessary to maintain contiguity in this district. We also avoid a municipal split of West Goshen Township.

DISTRICT 157. Currently Chester and Montgomery Counties, LRC maintains Chester and Montgomery Counties, while petitioners have just Chester County. Warren Kampf, seeking reelection. This district contains the other part of the needless Phoenixville Borough split, as well as needlessly crosses county lines and splits part of Upper Providence Township. Petitioners draw a district entirely in Chester County that does not create any municipal splits.

DISTRICT 158. Chester County. Chris Ross, seeking reelection. The LRC district 158

has the other part of the unnecessary West Goshen Township split. Petitioners map has no municipal splits and keeps it entirely in Chester County.

DISTRICT 159. Delaware County. Thaddeus Kirkland, seeking reelection. The LRC draws this district by cutting up Ridley Township, and Upper Chichester Township in multiple ward and division splits. The ripple effect is numerous divisions in almost every township across Delaware County, and municipal splits in every district under the LRC map, where the only municipality that absolutely has to be divided due to size is Upper Darby Township, and therefore the only districts that would require a municipal split would be the ones containing parts of Upper Darby Township. The legal reason that they use is to try to create a majority-minority African American district. We feel this is unnecessary. The district as it is drawn now is a minority coalition district where the incumbent, who is an African American, has been elected and reelected 10 times. We also draw an additional minority majority district in Delaware County in the 163rd. Currently, there is no Delaware County based minority majority district and our map creates one, as well as this African American and Hispanic minority coalition district. Therefore, we believe our district 159 with no municipal splits is in compliance with both the Pennsylvania Constitution and the VRA.

DISTRICT 160. Currently Chester and Delaware Counties, LRC maintains Chester and Delaware Counties, Petitioners have just Delaware County. Steven Barrar, seeking reelection. Because we do not split municipalities as the LRC does in District 159, we are able to keep a compact district in Southwestern Delaware County that does not cross

county lines. The LRC split's the hometown of the incumbent, Upper Chichester Township with 3 ward splits where we keep Upper Chichester entirely in this district.

DISTRICT 161. Currently Delaware County, LRC maintains Delaware County, Petitioners move to Montgomery County. Joseph Hackett, seeking reelection. As discussed in the Ground Rules, Southeastern PA (exclusive of Philadelphia) adds two districts as a region. Chester County adds two, one is lost in Delaware County and one is gained in Montgomery County. There has not been major population shifts in either of these counties over the last 10 years, this is more because of districts no longer overlapping from Philadelphia into Montgomery and Delaware Counties that causes this shift, as well as one district two districts overlapping Chester and Delaware Counties. We choose to move the 161st of the available Delaware County districts due to the seniority of the incumbent as well as the splits that would be necessary to keep his home in Ridley Township in the district. Currently, under the 2001 map the 161st has 8 split municipalities in it, a ridiculous number. The LRC map has just two, but with 3 ward splits, and we find it better for the residents of Delaware County to just move this district to Montgomery and the residents of Ridley Township can be represented in District 165. So therefore, as discussed earlier, this district becomes Lower Merion, Narberth, and West Conshohocken, finally giving Lower Merion residents a united voice in one district.

DISTRICT 162. Delaware County. Nick Miccarelli, running for reelection. The LRC plan splits two municipalities unnecessarily in this district. We only split one, the required to be split Upper Darby Township. We do split a ward in Upper Darby and this

district is the recipient of part of that. This is only done because Ward 2 (or district 2 as it is called) is non-contiguous, and the portion of District 2 where the incumbent in District 163, Nick Miccozie lives, Division 1, is part of the non-contiguous section. Likewise, we need to separate this out to create a majority-minority district in District 163, and therefore this ward split is legal and justifiable.

DISTRICT 163. Delaware County. Nick Miccozie, running for reelection. This becomes Delaware County's first true minority-majority district, uniting several townships and boroughs along the Philadelphia border in a compact district. The LRC puts District 164 as the majority-minority district. We disagree due to geography. Nick Miccozie lives closer to the heavily minority municipalities of Yeadon, Sharon Hill, and Darby Borough. To draw Margo Davidson of District 164 into this area would create a number of non-compact districts and would require multiple ward splits that are not necessary, as the LRC does. As mentioned, we do split District 2 due to the fact that this incumbent lives in the non-contiguous part of both Upper Darby District 2, and also the township as a whole. The LRC also draws part of Haverford Township into this district, which is the hometown of District 166 Representative Greg Vitali, and we find that municipal split to additionally be unnecessary.

DISTRICT 164. Delaware County. Margo Davidson, seeking reelection. As mentioned, we do not draw Margo Davidson into the majority-minority district in Delaware County. She is an African-American but she won election in a non majority-minority district, and to draw her into such a district would result in the additional unnecessary ward split in

Upper Darby as well as the unnecessary municipal split in Yeadon Borough under the LRC plan. We feel that by keeping her in the Western and Northern parts of Upper Darby Township instead that this does the residents of Upper Darby and Delaware County as a whole the most benefit.

DISTRICT 165. Delaware County. Bill Adolph, seeking reelection. The LRC continues the ridiculous carve-up of Delaware County by creating a non-compact district that stretches from the incumbent's home in the central Delaware County Township of Springfield up the Blue Route to Radnor Township in the northern part of the county. To do this, the LRC splits Marple Township, Radnor, (complete with 2 ward splits) and the incumbent's hometown of Springfield, (with an another ward split). All of these splits are unnecessary, and the Petitioners draw a compact, central Delaware County district with no municipal or ward splits.

DISTRICT 166. Currently Delaware County, LRC creates Delaware and Montgomery Counties, Petitioners maintain Delaware County. Greg Vitali, seeking reelection. The LRC manages in this district to divide all three municipalities in the district, complete with 4 ward splits, and cross county lines. All are unnecessary. Petitioners include one ward in the must be split township of Upper Darby, with no ward splits, and keep Haverford Township whole, the home of the incumbent, and the largest municipality in the district, and do not cross into Lower Merion like the LRC.

DISTRICT 167. Currently Chester County, LRC maintains Chester County, Petitioners have Chester and Delaware Counties. Duane Milne, seeking reelection. Petitioners trade the county split that the LRC plan has between Chester and Delaware Counties in District 160 with this one, and by doing so cause no municipal splits in either district.

DISTRICT 168. Currently Chester and Delaware County. LRC and Petitioners both create just Delaware County. Tom Killion, seeking reelection. Both the LRC and Petitioners plan creates a fairly compact completely Delaware County district, but Petitioners do this without the unnecessary ward split in Marple Township.

DISTRICT 169. Currently Philadelphia County. LRC moves to York County, Petitioners move to Chester County. Ed Neilson (2012, special) seeking full term. Basically, Petitioners achieve the same goals by moving districts to York and Chester counties, but just flip the district numbers. As discussed in the Ground Rules, Philadelphia must lose at least one district, and Petitioners move two districts out. The 169th was chosen due to the fact it lost the most population of any non minority-majority district in Philadelphia, and also due to the seniority of the representative. As Petitioners move one majority-minority district due to population loss in the 195th, we did not want to move a second one in fear of violating the VRA. Therefore we moved this district and create a Downingtown/Coatesville district which could be considered a minority crossover district due to the nearly 30% of VAP of Hispanic and African Americans in the district. This would be the first district that could be labeled as such in Chester County history.

DISTRICT 170. Currently Montgomery and Philadelphia Counties, LRC and Petitioners have it in just Philadelphia County. Brendan Boyle, seeking reelection. Here, we are going to begin the discussion of which wards in Philadelphia are split and the justifications of such. In Northeast Philadelphia, the incumbent in District 170, Brendan Boyle lives in the 58th Ward, his younger brother Kevin Boyle lives in the adjacent 63rd ward and represents District 172, John Sabatina of District 174 lives in the 56th ward which is adjacent to the 58th and 63rd wards, and just south of that Mark Cohen of District 202 lives in the 53rd ward. The 56th, 57th, 58th, 63rd, and 66th wards are larger than average Philadelphia wards and generally cannot be combined without going over the highest population threshold. Therefore, some wards need to be split. Going over all the possible combinations, we find that it was most appropriate to split the 56th and 57th wards. We still do a better job than the LRC, which manages to split every ward in Northeast Philadelphia. This district, which used to wind from the Greater Northeast into Montgomery County and back into the Lower Northeast, is now fairly compact, containing all of Ward 58 and part of Ward 56, and is entirely west of the Roosevelt Boulevard and does not cross county lines, like all districts that we draw in Philadelphia.

DISTRICT 171. Currently Mifflin and Centre Counties, LRC maintains Mifflin and Centre Counties, Petitioners keep just Centre County. The LRC splits this district over county lines and by doing so also splits tiny Mifflin County. Petitioners keep Mifflin County in District 82, and keep this district entirely in Centre County. Petitioners also eliminate the unnecessary municipal split in Ferguson Township.

DISTRICT 172. Currently Philadelphia County. Petitioners maintain just Philadelphia County, while LRC has Montgomery and Philadelphia Counties. Kevin Boyle, seeking reelection. The 172nd District, by virtue of it being the district represented by former Republican Speaker of the House John Perzel, was the most non-compact district in Pennsylvania, as the district was drawn to help politically accommodate Mr. Perzel and by doing so it divided 6 wards, and even created bridges of census blocks to skip over divisions. The LRC managed to somehow make it even worse for the residents of the 172nd District. As drawn by the LRC, the district needlessly crosses county lines by including the Borough of Rockledge, and manages to split parts of all 7 Philadelphia wards it crosses into, causing a snake-like district that winds from Fox Chase to the tip of Bridesburg. This was done apparently to try to salvage the career of the lone Republican left in Philadelphia, John Taylor of the 177th district by trying to move his district northward to include some of the Republican leaning parts of the 55th and 64th wards. It's unfortunate however for the residents of Northeast Philadelphia, who, if this LRC plan is upheld, will be yet again be subject to multiple wards and neighborhoods split into numerous districts. Petitioners were able to draw District 172 to include all of ward 63, all of ward 64, and most of ward 56, and make it not only much more compact, with 6 fewer ward splits and no municipal or county splits, but the district comes in with only a 595 person deviation from the ideal statistical mean, roughly half the deviation of the LRC plan.

DISTRICT 173. Philadelphia County. Mike McGeehan, seeking reelection. While not as bad as the LRC plan for District 172, the LRC needlessly split 3 of the 4 wards in this district, only keeping the incumbents home 65th ward intact. Petitioners on the other hand divide only the 57th ward and keep Wards 41 and 65 intact in this district.

DISTRICT 174. Philadelphia County. John Sabatina, seeking reelection. The LRC again managed to divide all 4 wards it contains. Petitioners found it necessary only to divide 2 of the 3 wards. The largest ward in the district, the 66th ward, was able to be kept intact. As the residents of the 66th ward lost former Speaker of the House Denny O'Brien and 66th ward resident to retirement after winning a seat on the Philadelphia City Council, and then wound up losing the 169th District after this redistricting, it would be appropriate in the minds of the Petitioners to keep the 66th ward intact in one district so that the residents would not be further punished by additional ward splits, as in the LRC plan which divides the 66th ward into 3 districts. A note on the contiguity of the district, the district is contiguous on a point that crosses both the Roosevelt Boulevard and the Pennypack Creek from Ward 56 into Ward 57. We would have liked to make this more compact, but we had to include the Ward 56 divisions as the incumbent lives there, and if we included the additional division up from it in 56-39 we would have also had to include 56-29 as 56-39 envelopes 56-29, and that would have made the district too large.

DISTRICT 175 -- Philadelphia County. Mike O'Brien, seeking reelection. The incumbent, a 31st ward resident, will find his district changed fairly dramatically due to the unwinding of the gerrymander in the 177th district and also the need to create a

majority Hispanic district adjacent to the 175th, and also avoid ward splits. However, despite all this Petitioners only manage to split ward 18, and that was necessary in order to create the additional majority Hispanic district. Petitioners keep 4 of the 5 wards intact, while the LRC divides all 5 wards in the district.

DISTRICT 176 -- Monroe County. Mario Scavello, seeking reelection. The LRC tries to keep this district more Republican by cutting out Coolbaugh Township, home of the largest division in population in the entire state at a population of 8,402, and home of the most votes for Barack Obama of any division in the state at 2,050. This split separates this township from the rest of Monroe County and does the residents of that growing town a disservice. We keep this district more compact as well as a closer population to the ideal mean as well.

DISTRICT 177 -- Philadelphia County, John Taylor, seeking reelection. The incumbent, who is the sole Republican representative remaining in the City of Philadelphia, lives in a heavily Democratic district and an even more heavily Democratic ward in Ward 23. The LRC attempts to help him out by starting with his division, snaking it in a line south toward the more Republican 45th ward, then snaking it north into the Mayfair and Holmesburg sections in the 55th and 64th wards. The result is a horribly gerrymandered and non-compact district that divides all 7 wards it goes into, as well as chopping up neighborhoods. We thought that after the defeat of John Perzel that this type of gerrymandering would stop in Northeast Philadelphia, but it continues again with this district. Not with our plan. Our plan has a compact 177th district that encompasses just

all of 2 wards and part of an additional ward, making the population closer to the ideal mean than the LRC plan. It also becomes a minority coalition district.

DISTRICT 178. Bucks County. Scott Petri, running for reelection. We like to try to avoid taking the largest municipality out of a district and moving it, as it creates a situation where the incumbent is representing a large amount of new territory, and may confused citizens. But in this case, there is no way to include Northampton in the 178th without, after moving the 142nd and 29th, to wind up not creating an additional municipal split in Buckingham Township. Therefore, Petitioners create the new 178th as a Central Bucks County District. Indeed, the incumbent should be pleased that he can drive on his own road and drive through three of the municipalities in the new district.

DISTRICT 179 -- Philadelphia County. Tony Payton, NOT running for reelection. Up until the 2012 election, Petitioners, and Philadelphia members, are fortunate that all of the incumbent representatives live in separate wards from any other representative, so that none of them face the same fate as the representatives in Erie County that are in the same ward in the same municipality. This will likely change after this election, as the winner of the Democratic Primary, James "Scoot" Clay is running unopposed and has no Republican opposition in this heavily Democratic district and John Taylor of the 177th District will both be residents of the 23rd Ward. However, we do not consider Mr. Clay an incumbent yet as he has not won election, and even if he did, our Ground Rules suggest that we would move the 179th as he would not have seniority over the 15 term incumbent Taylor. He may choose to challenge Mr. Taylor in the 177th or move back

into the now much more compact 179th District. As with almost all the Philadelphia district, the LRC needlessly splits numerous wards, dividing all 7 wards in the district; with two of these wards they just draw in one divisions. The Petitioners plan only split Ward 62, which ironically allows the previous incumbent Tony Payton, who intended to run for reelection but withdrew his nominating petitions when it became apparent they were defective, to run in this district without having to move, and keep wards 54 and 55 in tact in the district. Also, with African Americans, Hispanics, and Asians all having more than 10% of VAP in this district, this district maintains its status as a minority crossover or minority influence district.

DISTRICT 180 -- Philadelphia County. Angel Cruz, running for reelection. This is the one existing majority Hispanic district under the 2001 plan. It remains as such as is joined by two others, the 127th in Berks County and the 197th adjacent to the 180th in Philadelphia County. To draw two Hispanic majority districts, several wards did need to get split where otherwise they would not have need to. Petitioners divide Ward 7, which is the incumbent's home ward, while the LRC does not, but by doing so they avoid the 5 ward splits that are needed in the LRC plan to accomplish the second majority Hispanic District in District 197. Petitioners still only draw 3 wards while the LRC draws parts of 4.

DISTRICT 181 -- Philadelphia County. W Curtis Thomas, running for reelection. The LRC splits 6 wards in this district, including the ward of the incumbent. Petitioners instead maintain 2 complete wards with no splits.

DISTRICT 182 -- Philadelphia County. Babette Josephs, defeated in primary.

Petitioners split only 1 ward while LRC split 2 wards.

DISTRICT 183 -- Lehigh and Northampton Counties. The Petitioners only split the City of Allentown, which already needs to be split due to its size, and no other municipalities.

As the incumbent lives in North Catasauqua in Northampton County, as Catasauqua is in Lehigh County, and this along with other districts in the Lehigh Valley often relate to both Lehigh and Northampton Counties, this split is less offensive and not as needless as in other areas. The LRC does split this county but also splits three additional municipalities in this district as well.

DISTRICT 184. Philadelphia County. Bill Keller, running for reelection. While drawing the Philadelphia districts, Petitioners attempt to avoid as many ward splits as possible, but also try to avoid crossing as many major streets as possible as well. Two streets that make natural district borders are Broad Street and the Roosevelt Boulevard. In this case, while it would make a slightly lower population deviation by crossing Broad Street and splitting ward 48, Petitioners try to keep this district entirely east of Broad Street and keep 2 wards complete, and therefore avoid splitting any wards in this district, but due to the need to make District 185 a majority-minority district per the LRC, we had to cross Broad Street in the heavily white divisions of the 26th ward bordering Broad Street to take away some of the more white divisions from District 185.

DISTRICT 185. Philadelphia County. Maria Donatucci, running for reelection. This district is, barely, a minority-majority district, which required that some of the majority white divisions of the southeastern part of the 26th ward to go to District 184, and we took a few heavily African-American divisions out of the 51st ward to achieve this goal. However, we do not split county lines, split a ward in Darby Township and three wards in Philadelphia like the LRC does.

DISTRICT 186. Philadelphia County. Harold James, NOT running for reelection. Because the incumbent was not running for reelection we moved this district from West Philadelphia to North Philadelphia. This is another minority-majority district, but Petitioners were able to accomplish this by drawing five complete wards with no splits. LRC on the other hand split 3 wards.

DISTRICT 187. Berks and Lehigh Counties, Gary Day, running for reelection. Both LRC and Petitioners draw this district as a western Lehigh Valley district with one county split and no municipal splits.

DISTRICT 188. Philadelphia County. James Roebuck, running for reelection. This is another majority-minority district. Both LRC and Petitioners split 2 wards. Originally, Petitioners drew this with one ward split but had to add a ward split in the 51st Ward due to the need to create a majority-minority district in District 185.

DISTRICT 189. Monroe and Pike Counties, Rosemarie Brown, running for reelection.

Both LRC and Petitioners draw this as a Eastern Poconos district that crosses the Pike/Monroe County line, however, the LRC needlessly splits Stroud Township.

DISTRICT 190. Philadelphia County, Vanessa Brown, running for reelection. Some of the West Philadelphia districts have numerous needless splits where they can fit nicely into a district without having any splits. The Petitioners keep Wards 4, 6, 24 and 44 whole and only split Ward 27 to create this majority-minority district. The LRC splits 5 wards in this district needlessly.

DISTRICT 191. Currently Delaware and Philadelphia Counties, LRC maintains Delaware and Philadelphia Counties, Petitioners have just Philadelphia County. Ron Waters, running for reelection. Petitioners are able to draw this district as 2 Philadelphia wards, maintain the districts majority-minority status, and do not cross county lines. LRC crosses into Delaware County, split the Borough of Yeadon in the process, and then divide 3 wards needlessly.

DISTRICT 192. Philadelphia County. Louise Bishop, running for reelection. Just like in District 191, Petitioners were able to draw a majority-minority district by including 2 full wards, while the LRC splits 2 of the three wards in this district needlessly.

DISTRICT 193. Currently York and Adams Counties, Petitioners maintain York and Adams Counties, LRC draws Cumberland and Adams Counties. Will Tallman, running

for reelection. Both LRC and Petitioners draw a district that makes one county split and no municipal splits, however petitioners are able to create a district with a mere 17 person deviation from the ideal.

DISTRICT 194. Currently Montgomery and Philadelphia Counties, LRC maintains Montgomery and Philadelphia Counties, Petitioners have just Philadelphia County. Pam Delissio, running for reelection. This is one of the four districts that the LRC drew into Lower Merion, and this was one of the two that required an additional county split to do so. As petitioners show, there continues to be no legal justification to do so, and Petitioners are able to keep this district entirely in Philadelphia with 2 full complete wards and one small ward split. LRC has a county split, a ward split in Lower Merion, and an additional ward split in Philadelphia.

DISTRICT 195. Currently Philadelphia County. LRC Maintains Philadelphia County, Petitioners move district to Berks County. Michelle Brownlee, running for reelection. Per the Ground Rules, we find that either one of two districts have to move from Philadelphia to other areas, and Petitioners elect to move two. The LRC, as mentioned before, have to take 4 primarily Philadelphia districts into the suburbs in order to prevent this from occurring. By moving the second district, Petitioners were able to not have any county splits from Philadelphia into the suburbs. Petitioners create a new district in Berks County with no county or municipal splits. We chose this district to move due to population losses in the area as well as the incumbent's seniority. The other districts with representatives that resigned due to being elected to other offices (169th, 186th, and

197th) were all also moved to due to population shifts and to prevent having to split wards to accommodate the residences of representatives. The remaining LRC Philadelphia based district splits 2 wards.

DISTRICT 196. York County. Seth Grove, Running for reelection. Petitioners draw this district with no municipal splits, the LRC draws a split in West Manchester, which was made only to draw the residence of Eugene DePasquale into York City. It therefore has no legal justification.

DISTRICT 197. Philadelphia County. Gary Williams (2012, special) running for reelection. This district was moved slightly in order to create the second majority-minority Hispanic district in Philadelphia. In doing so, petitioners have to split 3 wards in the process, but they still do better than the LRC plan which splits 5 wards to accomplish this.

DISTRICT 198. Philadelphia County. Rosita Youngblood, running for reelection. This is an additional majority-minority district in Philadelphia. Petitioners are able to draw this yet again without having to split any wards, while the LRC splits three wards.

DISTRICT 199. Currently Cumberland County, LRC maintains Cumberland County, Petitioners have Adams and Cumberland Counties. Steven Bloom, running for reelection. Petitioners traded this county split with a split in another district, but avoided a municipal split in Silver Spring Township that the LRC did not.

DISTRICT 200. Philadelphia County, Cherelle Parker, running for reelection. This is last of the three districts where the Petitioners and LRC drew the same exact district. Finally, the LRC agreed with us that they can draw a district in Philadelphia without any needless ward splits. This is also a majority-minority district.

DISTRICT 201. Philadelphia County. John Myers, NOT running for reelection. These districts are similar in both plans but the LRC needlessly splits ward 17 while the petitioners do not. This is a majority-minority district.

DISTRICT 202. Philadelphia County. Mark Cohen, running for reelection. In the 2001 plan, this district was shaped like a tapeworm, running across Philadelphia from Olney into the Lower Northeast, splitting numerous wards. While more compact this time, the LRC still splits all 5 wards, as an after effect of continuing to try to protect John Taylor's reelection chances in the 177th District. Petitioners draw a very compact district in the Lower Northeast encompassing all of the 35th and 53rd wards, which just fall under the lower population threshold for a district, and therefore Petitioners added 2 divisions in the already split 42nd ward. Additionally Petitioners create a district with a population deviation from the ideal mean of just 270 voters. This is a minority coalition district.

DISTRICT 203. Philadelphia County. Dwight Evans, running for reelection. Petitions keep this a majority-minority district by splitting the already split 42nd ward only, and keeping Wards 10 and 61 in tact, and also achieving a population deviation of just 88 persons from the ideal. This is a majority-minority district.

SENATE DISTRICTS

Since both the LRC and Petitioners were able to draw maps that did not split any municipality except Philadelphia and Pittsburgh, which were both required to be split due to size, our focus will not be municipal splits but ward and county splits. Overall, the LRC has a total of 69 county splits and 19 ward splits, while Petitioners have 52 county splits and 8 ward splits. Additionally, as mentioned in the Ground Rules, the Petitioners population deviation is less than half of the LRC, as well as 42 out of 50 districts have a closer population to the ideal median than the LRC. We will therefore limit our commentary to the issues with the county splits and ward splits.

DISTRICT 1 - Philadelphia County. One of the first obvious issues with the LRC map was the number of unnecessary overlaps between Philadelphia County and Montgomery and Delaware Counties. Currently, 7 Senators live in Philadelphia. Therefore it could be deduced that part of this plan is to accommodate the 7 Senators there. However, from doing the analysis by dividing the population of Philadelphia by the ideal number for Senate seats, we find that 6 seats fit inside Philadelphia without any needed county splits. We had the challenge therefore to move a district, while also maintaining the 4 majority-minority districts in Districts 3, 4, 7 and 8. By process of elimination, if there are 7 Senate Districts and one has to be eliminated, and 4 are majority-minority, we would have to move one of the non-minority majority districts. So we look at the other 3, District 1, 2, and 5. First, District 5 is soundly in Northeast Philadelphia, which has the smallest concentration of minorities in all of Philadelphia. If we were to move District 5, we would have to move District 2 far north, and the resulting movement of district lines

would cause almost all of the remaining districts to become non-compact. Likewise, we could move District 2, but as District 5 is already compact, we would have to shift the other districts northward and this would make the other districts less compact. Therefore, it made sense to move District 1, as this was the odd district out of this logical process. We move this district to Chester County per the Ground Rules.

In addition, we do believe that the refusal of the LRC to correct this issue has more to do with politics than their inability to do math. We will address these issues as a group rather than for individual districts as they affect the entire Southeastern Pennsylvania region. In District 4, the LRC puts the townships of Abington, Cheltenham, Springfield, and the Boroughs of Jenkintown, and Rockledge into this Philadelphia based district. District 7 gets Upper Dublin and Whitemarsh Townships and the Borough of Conshohocken, and District 8 gets the Township of Darby and the Boroughs of Collingdale, Colwyn, Darby, Folcroft, Lansdowne, Norwood, Sharon Hill, and Yeadon. All of these suburban municipalities have one thing in common -- in all 18 of them Barack Obama won in 2008, (see Delaware and Montgomery County Board of Elections) many overwhelmingly, and most are currently represented by Democratic State Representatives. Therefore, by making these unnecessary county splits and making urban/suburban districts, the LRC attempted to thwart the Democratic performance of these municipalities to prevent these from being included in the 9th, 12th, and 26th Senatorial Districts, which are currently represented by Republicans. Therefore it is clear that these splits are not "absolutely necessary" as required by Article 2, Section 16 of the Pennsylvania Constitution.

DISTRICTS 2, 3, 4, 5, 7 and 8. Some ward splits were necessary in order to make Districts 3, 4, 7 and 8 majority-minority districts, as all 4 of these districts are barely majority-minority. There were no ward splits necessary in District 5 as it only bordered District 2, a non-majority-minority district.

DISTRICTS 6 and 10. The Court is probably familiar with our map, as we basically borrowed this map from the original Amanda Holt petition. Our only change in the whole map is a minor one, we realign some of the townships in Bucks County to bring the population slightly closer to the ideal mean in District 6 and make them more compact. The 2001 LRC plan drew Falls Township and Morrisville Borough in Bucks County into District 10 in order to dilute the Democratic performance of these municipalities. Petitioners draw a more compact District 6 and also makes the population slightly closer to the ideal mean, and the resulting District 10 is also more compact with about the same population deviation.

DISTRICTS 9, 12, and 26. These are all suburban districts that while on the surface do not appear to be modified significantly, they are in fact more compact and closer to the ideal population deviation than the LRC maps. As a result of keeping all 6 Philadelphia Districts wholly in Philadelphia, compared to the LRC map, District 9 received the Borough of Norwood from District 8. District 12 received the Townships of Abington, Cheltenham, Springfield, and Upper Dublin and the Townships of Jenkintown and Rockledge from Districts 4 and 7, and District 26 receives a number of Delaware County

boroughs from District 8. All of these changes make the districts more compact, closer to the ideal population than in the LRC, and eliminate 3 unnecessary splits.

DISTRICT 11 -- As a result of eliminating an unnecessary split of Berks County, this district moves slightly northward, which displaces the incumbent in Ruscombmanor Township.

DISTRICT 15 -- We keep this district as an all Dauphin County district as it has been for many years. We do not believe that drawing District 48 into Dauphin County and then drawing this district into Perry County is necessary, and we maintain that these unnecessary splits were done specifically for political purposes.

DISTRICT 20 -- We were able to draw this district and keep six counties in Northeastern Pennsylvania whole. The LRC plan has five counties and splits two of them. This was done as an accommodation to the incumbent, Lisa Baker, and her home in Luzerne County. There is no legal justification for this additional split so therefore we move this district and displace the incumbent. Since she is up for reelection in 2014 she can easily move in order to retain her seat. Therefore, this is a prime example of unnecessary county splits in the LRC plan.

DISTRICT 21 -- We moved this district from Northwestern PA to Southeastern PA due to population losses in Western PA. We chose this district because the incumbent, Mary Jo White, is retiring.

DISTRICT 38 -- We moved this district out of Allegheny County even though there is currently an open seat in District 37 and a Special Election pending in District 40. This was done because first, District 38 lost the most population of any Senate District in Pennsylvania from 2000 to 2010. The population losses in District 41 did not justify moving that district, and also, since we only split Pittsburgh over 2 districts, we would have been unable to accommodate the residents of all three Senators that currently live in Pittsburgh. (Ferlo, Fontana and Costa). In addition, if we were to not move District 38, we would have had to shift it so far north and west that it would basically resemble District 40. Indeed, the LRC basically did this in their plan and as such, more of District 40 is in the LRC District 38 than the existing District 38.

DISTRICT 41 -- This is another example, like District 20, when an unnecessary split was created solely to accommodate the home of an incumbent. In this case, the majority of this district as it is currently drawn encompasses Butler and Armstrong Counties. However the incumbent lives in Indiana County, and therefore the district includes two additional county splits to ensure his residence is in the district. We find that Butler and Armstrong Counties fit nicely into one Senate district and therefore we cannot find any legal justification to not move this district out of Indiana County.