NON-CONTINUOUS FRAGMENTS OF HOUSE DISTRICTS
2012 FINAL PLAN

1) House District 10 (Taylor Township, Lawrence County)

Two non-contiguous fragments of Taylor Township are surrounded by neighboring municipalities (New Castle City, Union Township, North Beaver Borough).

One fragment is totally uninhabited and appears to be a dump. The second fragment is mostly woodland, but has a single road with a population of 27.

Total Population: 27

2) House District 37 (Mount Joy Township, Lancaster County)

A non-contiguous fragment of Mount Joy Township is located entirely within Elizabethtown Borough.

Total Population: 20

3) House District 43 (East Lampeter Township, Lancaster County)

A non-contiguous fragment of East Lampeter Township is entirely surrounded by Lancaster City. The non-contiguous fragment appears to be an unpaved parking lot and is uninhabited.

Total Population: 0

4) House District 43 (Lancaster Township, Lancaster County)

Two fragments of Lancaster Township are surrounded by Lancaster City. The fragments have populations of 10 and 11, respectively.

Total Population: 21

5) House District 97 (Manheim Township, Lancaster County)

Two fragments of Manheim Township are surrounded by Lancaster City. One fragment is an industrial site, the other is a park. Both are uninhabited.

Total Population: 0
6) **House District 124 (West Brunswick Township, Schuylkill County)**

An uninhabited fragment of West Brunswick Township is surrounded by South Manheim Township and Auburn Borough. The fragment is a wooded hillside.

**Total Population: 0**

7) **House District 128 (Cumru Township, Berks County)**

Two uninhabited fragments of Cumru Township are surrounded by the City of Reading and West Reading. One fragment is an industrial site. The other is a park.

**Total Population: 0**

8) **House District 156 (Birmingham Township, Chester County)**

A noncontiguous fragment of Birmingham Township, Chester County, and Chester County itself, is surrounded by Chadds Ford, Delaware County and the State of Delaware. The fragment is uninhabited and appears to be stables.

**Total Population: 0**

**TOTAL POPULATION OF ALL FRAGMENTS: 68**
House District 10 (Taylor Township, Lawrence County)
Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Google Maps is an internet based mapping program. We do not claim that all boundaries displayed by Google Maps are 100% accurate. Data provided to Google in order to render the maps was obtained from the respective datasource listed above.

Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm
House Legislative Interactive District Map

District: 10

Show Overlay: District Outline Only


Click on the highlighted district for additional information.

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend

1991 District Border
2001 District Border
2011 Original Preliminary District Border
2011 Remanded Final District Border
2012 Revised Preliminary District Border
2012 Revised Final District Border

County Border
Municipality Border
School District Border

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Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm

8/1/2012
House District 37 (Mount Joy Township, Lancaster County)
Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend

- **1991 District Border**
- **2001 District Border**
- **2011 Original Preliminary District Border**
- **2011 Remanded Final District Border**
- **2012 Revised Preliminary District Border**
- **2012 Revised Final District Border**
- **County Border**
- **Municipality Border**
- **School District Border**

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Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm
House District 43 (East Lampeter Township, Lancaster County)
House Legislative Interactive District Map

District: 43
Show Overlay: District Outline Only
Boundary: 1991 2011 Original Preliminary
2001 2011 Remanded Final
2012 Revised Preliminary
2012 Revised Final

Click on the highlighted district for additional information.

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend

- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

Google Maps is an internet based mapping program. We do not claim that all boundaries displayed by Google Maps are 100% accurate. Data provided to Google in order to render the maps was obtained from the respective datasource listed above.

Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm

8/1/2012
House District 43 (Lancaster Township, Lancaster County)
House Legislative Interactive District Map

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend

- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

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Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm
House District 97 (Manheim Township, Lancaster County)
Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

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Map Legend

- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

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Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm

8/1/2012
County

House District 124 (West Brunswick Township, Schuylkill)
House Legislative Interactive District Map

District: 124
Show Overlay: District Outline Only

Click on the highlighted district for additional information.

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

✧ School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend

- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

Google Maps is an internet based mapping program. We do not claim that all boundaries displayed by Google Maps are 100% accurate. Data provided to Google in order to render the maps was obtained from the respective datasource listed above.

Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm 8/1/2012
House District 128 (Cumru Township, Berks County)
House Legislative Interactive District Map

District: 128
Show Overlay: District Outline Only

Click on the highlighted district for additional information.

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Map Legend
- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

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Download Map Data

http://www.redistricting.state.pa.us/Maps/House.cfm 8/1/2012
Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

* School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

Google Maps is an internet based mapping program. We do not claim that all boundaries displayed by Google Maps are 100% accurate. Data provided to Google in order to render the maps was obtained from the respective datasource listed above.

Download Map Data
House District 156 (Birmingham Township, Chester County)
House Legislative Interactive District Map

**District:** 156

**Show Overlay:** District Outline Only

**Boundary:**
- 1991
- 2001
- 2011 Original Preliminary
- 2011 Remanded Final
- 2012 Revised Preliminary
- 2012 Revised Final

Click on the highlighted district for additional information.

Once a district is selected, with or without an overlay, clicking on an outlined area will identify that area at the district, county, municipal or school district level.

† School district layers are not yet available for the 2012 revised preliminary and final plans and will not display on the map when "District Outline + School District Border Outline" is selected for the 2012 revised preliminary plan and 2012 revised final plan.

**Map Legend**
- 1991 District Border
- 2001 District Border
- 2011 Original Preliminary District Border
- 2011 Remanded Final District Border
- 2012 Revised Preliminary District Border
- 2012 Revised Final District Border
- County Border
- Municipality Border
- School District Border

Google Maps is an internet based mapping program. We do not claim that all boundaries displayed by Google Maps are 100% accurate. Data provided to Google in order to render the maps was obtained from the respective datasource listed above.

http://www.redistricting.state.pa.us/Maps/House.cfm

8/1/2012
HOLT HOUSE DISTRICTS / MEMBERS INCLUDED

core, requiring the following forty-two elected representatives to run against one another:
The Holt Alternative plan combines districts with no regard to historical districts.

A. Concesses Between Elected Legislators

HOUSE DISRUPTIONS

major upended in both chambers of the legislature. As illustrated by the list below, the Holt Alternative plan would cause
of core of districts. As illustrated by the list below, the Holt Alternative plan would cause
pays no heed to the legislative consideration of continuity of representation and the preservation

The Holt Alternative Plan was produced outside of the channels of Article II, §17 and

HOLT ALTERNATIVE PLAN

Disruptions in Continuity of Representation Effected By the
B. Vacant Districts in the Holt Alternative Plan

The Holt alternative plan causes further disruption to the continuity of representation in the House by so drastically disregarding the cores of existing districts as to create 22 districts with no currently sitting member. In each of these districts, the current representative has been placed into a different single-member district comprising a core constituency significantly different than that which elected the member:

VACANT HOUSE DISTRICT / CURRENT MEMBER

4 / Sonney (R)
21 / D. Costa (D)
31 / Santasiero (D)
38 / Kortz (D)
47 / Gillespie (R)
59 / Reese (R)
85 / F. Keller (R)
95 / DePasquale (D)
96 / Sturla (D)
101 / Gingrich (R)
106 / Payne (R)
114 / Kavulich (D)
116 / Toohil (R)
130 / Maloney (R)
138 / Hahn (R)
150 / Vereb (R)
156 / Truitt (R)
160 / Barrar (R)
161 / Hackett (D)
171 / Benninghoff (R)
181 / Thomas (D)
203 / D. Evans (D)
2) **SENATE DISRUPTIONS**

**A. Contests Between Elected Legislators**

The Holt alternative plan combines districts with no regard to historical district cores, requiring the following elected Senators – and candidates certain to win election at the November 6, 2012, election – to run against one another:

**HOLT SENATE DISTRICT / MEMBERS INCLUDED**

3 / Kitchen (D) v. Farnese (D), incumbent in SD 1  
14 / Yudichak (D) v. Baker (R), incumbent in SD 20  
25 / Scarnati (R) v. White, D. (R), incumbent in SD 41  
42 / Fontana (D) v. Raja (R) / Smith (D), the only candidates for SD 37  
50 / Robbins (R) v. Hutchison (R), the only candidate for SD 21

**B. Contests Between Incumbent Senators and Candidates for Other Senate Districts**

The Holt alternative plan also combines an incumbent Senator and a candidate for another Senate district under the 2001 Senate Plan and 2012 Senate plan:

8 / Williams (D) v. Gambone (R), candidate for SD 1
### COMPARATIVE REOCK COMPACTNESS SCORES

<table>
<thead>
<tr>
<th>Senate District Reock Score of:</th>
<th>Rev Holt # of Districts</th>
<th>Rev Holt % of Districts</th>
<th>2012 Final Plan # of Districts</th>
<th>2012 Final Plan % of Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td>.243 or less</td>
<td>24</td>
<td>48%</td>
<td>29</td>
<td>58%</td>
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<tr>
<td>.244 to .299</td>
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<td>22%</td>
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<td>.300 to .399</td>
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<td>16%</td>
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<td>8</td>
<td>16%</td>
<td>2</td>
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<tr>
<td><strong>Holt</strong></td>
<td><strong>0.28</strong></td>
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<tr>
<td>Ave. Reock Score</td>
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</table>

<table>
<thead>
<tr>
<th>House District Reock Score of:</th>
<th>Rev Holt # of Districts</th>
<th>Rev Holt % of Districts</th>
<th>2012 Final Plan # of Districts</th>
<th>2012 Final Plan % of Districts</th>
</tr>
</thead>
<tbody>
<tr>
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<td>73</td>
<td>36%</td>
<td>93</td>
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<tr>
<td>.244 to .299</td>
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<td>29%</td>
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<td>23%</td>
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<td>27%</td>
<td>50</td>
<td>25%</td>
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<td>8%</td>
<td>13</td>
<td>6%</td>
</tr>
<tr>
<td><strong>Holt</strong></td>
<td><strong>0.28</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ave. Reock Score</td>
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</table>

### COMPARATIVE POLSBY & POPPER COMPACTNESS SCORES

<table>
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<tr>
<th>Senate District Polsby &amp; Popper Score of:</th>
<th>Rev Holt # of Districts</th>
<th>Rev Holt % of Districts</th>
<th>2012 Final Plan # of Districts</th>
<th>2012 Final Plan % of Districts</th>
</tr>
</thead>
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<td>.176 or less</td>
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<td>2%</td>
<td>12</td>
<td>24%</td>
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<tr>
<td>.177 to .199</td>
<td>1</td>
<td>2%</td>
<td>2</td>
<td>4%</td>
</tr>
<tr>
<td>.200 to .299</td>
<td>14</td>
<td>28%</td>
<td>21</td>
<td>42%</td>
</tr>
<tr>
<td>.300 to .399</td>
<td>21</td>
<td>42%</td>
<td>9</td>
<td>18%</td>
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<tr>
<td>.400 or higher</td>
<td>13</td>
<td>26%</td>
<td>6</td>
<td>12%</td>
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<table>
<thead>
<tr>
<th>House District Polsby &amp; Popper Score of:</th>
<th>Rev Holt # of Districts</th>
<th>Rev Holt % of Districts</th>
<th>2012 Final Plan # of Districts</th>
<th>2012 Final Plan % of Districts</th>
</tr>
</thead>
<tbody>
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<td>.176 or less</td>
<td>10</td>
<td>5%</td>
<td>41</td>
<td>20%</td>
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<td>.177 to .199</td>
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<td>9.40%</td>
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<td>26%</td>
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<td>35%</td>
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<tr>
<td>.300 to .399</td>
<td>63</td>
<td>31%</td>
<td>48</td>
<td>24%</td>
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<tr>
<td>.400 or higher</td>
<td>69</td>
<td>33.90%</td>
<td>25</td>
<td>11%</td>
</tr>
</tbody>
</table>
**DOHERTY SUBDIVISION OMISSIONS AND DUPLICATIONS**

1) **House of Representatives:**

The Doherty Alternative Plan completely omits the following municipalities:

<table>
<thead>
<tr>
<th>COUNTY</th>
<th>Municipality</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adams</td>
<td>Bonneauville Borough</td>
<td>1,800</td>
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<tr>
<td>Adams</td>
<td>Highland Township</td>
<td>943</td>
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<tr>
<td>Adams</td>
<td>New Oxford Borough</td>
<td>1,783</td>
</tr>
<tr>
<td>Beaver</td>
<td>Ellwood City Borough</td>
<td>632</td>
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<tr>
<td>Beaver</td>
<td>Glasgow Borough</td>
<td>60</td>
</tr>
<tr>
<td>Beaver</td>
<td>Patterson Township</td>
<td>3,029</td>
</tr>
<tr>
<td>Beaver</td>
<td>Pulaski Township</td>
<td>1,500</td>
</tr>
<tr>
<td>Bucks</td>
<td>Sellersville Borough</td>
<td>4,249</td>
</tr>
<tr>
<td>Butler</td>
<td>Brady Township</td>
<td>1,310</td>
</tr>
<tr>
<td>Butler</td>
<td>Center Township</td>
<td>7,898</td>
</tr>
<tr>
<td>Butler</td>
<td>Connoquenessing Borough</td>
<td>528</td>
</tr>
<tr>
<td>Chester</td>
<td>Uwchlan Township</td>
<td>18,088</td>
</tr>
<tr>
<td>Chester</td>
<td>West Pikeland Township</td>
<td>4,024</td>
</tr>
<tr>
<td>Chester</td>
<td>West Sadsbury Township</td>
<td>2,444</td>
</tr>
<tr>
<td>Clearfield</td>
<td>Falls Creek Borough</td>
<td>48</td>
</tr>
<tr>
<td>Columbia</td>
<td>Cleveland Township</td>
<td>1,110</td>
</tr>
<tr>
<td>Crawford</td>
<td>Centerville Borough</td>
<td>218</td>
</tr>
<tr>
<td>Cumberland</td>
<td>North Newton Township</td>
<td>2,430</td>
</tr>
<tr>
<td>Cumberland</td>
<td>South Newton Township</td>
<td>1,383</td>
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<tr>
<td>Cumberland</td>
<td>Southampton Township</td>
<td>6,359</td>
</tr>
<tr>
<td>Dauphin</td>
<td>Berryburg Borough</td>
<td>368</td>
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<tr>
<td>Dauphin</td>
<td>Jefferson Township</td>
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<tr>
<td>Delaware</td>
<td>Eddystone Borough</td>
<td>2,410</td>
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<td>Erie</td>
<td>Cranesville Borough</td>
<td>638</td>
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<td>Fayette</td>
<td>Seven Springs Borough</td>
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<td>Indiana</td>
<td>Saltsburg Borough</td>
<td>873</td>
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<tr>
<td>Lackawanna</td>
<td>Clarks Summit Borough</td>
<td>5,116</td>
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<td>Lackawanna</td>
<td>Dickson City Borough</td>
<td>6,070</td>
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<tr>
<td>Lackawanna</td>
<td>Jessup Borough</td>
<td>4,676</td>
</tr>
<tr>
<td>Lancaster</td>
<td>East Petersburg Borough</td>
<td>4,506</td>
</tr>
<tr>
<td>Lancaster</td>
<td>Mount Joy Borough</td>
<td>7,410</td>
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<tr>
<td>Luzerne</td>
<td>Wilkes-Barre Township</td>
<td>2,967</td>
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<tr>
<td>Lycoming</td>
<td>Montgomery Borough</td>
<td>1,579</td>
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<td>Perry</td>
<td>Landisburg Borough</td>
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<td>Perry</td>
<td>Liverpool Township</td>
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<tr>
<td>Philadelphia</td>
<td>42-12</td>
<td>1,127</td>
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<tr>
<td>Schuylkill</td>
<td>Girardville Borough</td>
<td>1,519</td>
</tr>
<tr>
<td>Schuylkill</td>
<td>New Ringgold Borough</td>
<td>276</td>
</tr>
<tr>
<td>Somerset</td>
<td>Seven Springs Borough</td>
<td>11</td>
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<tr>
<td>Somerset</td>
<td>Somerset Borough</td>
<td>6,277</td>
</tr>
<tr>
<td>Washington</td>
<td>Nottingham Township</td>
<td>3,036</td>
</tr>
<tr>
<td>Washington</td>
<td>West Brownsville Borough</td>
<td>992</td>
</tr>
<tr>
<td>York</td>
<td>Loganville Borough</td>
<td>1,240</td>
</tr>
</tbody>
</table>

**Total Population** | 112,579
The Doherty Alternative Plan assigns the following municipalities to multiple districts:

<table>
<thead>
<tr>
<th>Municipality</th>
<th>District Assignments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Londonderry Township</td>
<td>13/169</td>
</tr>
<tr>
<td>New Garden</td>
<td>13/158</td>
</tr>
<tr>
<td>London Britain</td>
<td>13/158</td>
</tr>
<tr>
<td>Penn Township</td>
<td>13/158</td>
</tr>
<tr>
<td>Independence Township</td>
<td>16/46</td>
</tr>
<tr>
<td>Frankfurt Springs</td>
<td>16/46</td>
</tr>
<tr>
<td>Roaring Creek</td>
<td>109/123</td>
</tr>
</tbody>
</table>

2) **Senate:**

The Doherty Alternative Plan completely omits the following counties:

<table>
<thead>
<tr>
<th>County</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fulton</td>
<td>14,845</td>
</tr>
<tr>
<td>Union</td>
<td>44,947</td>
</tr>
</tbody>
</table>

The Doherty Alternative Plan assigns the following municipalities to multiple districts:

<table>
<thead>
<tr>
<th>Municipality</th>
<th>District Assignments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Falls Township</td>
<td>6/10</td>
</tr>
<tr>
<td>York Haven</td>
<td>28/38</td>
</tr>
<tr>
<td>Sewickley Township</td>
<td>32/39</td>
</tr>
<tr>
<td>Seward Borough</td>
<td>32/39</td>
</tr>
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<td>Smithton Borough</td>
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<td>Washington Township</td>
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IN THE SUPREME COURT OF PENNSYLVANIA

COMMON CAUSE, Petitioner

and

THOMAS H. DEWALL, Petitioner

and

TERRY K. WHEELER, Esquire, Petitioner

v.

LEGISLATIVE REAPPORTIONMENT COMMISSION, Respondent

PETITION FOR REVIEW

Petitioners hereby petition Your Honorable Court to review the final reapportionment plan promulgated by the Legislative Reapportionment Commission, and aver that:

1. This Honorable Court has jurisdiction of this matter pursuant to Pa. Const. Art. 2, § 17(d) and 42 Pa. C.S.A. § 725(1).

2. Common Cause is a non-profit corporation organized under the laws of the District of Columbia and registered to do business in Pennsylvania, with its principal office at 301 Market Street, Harrisburg, Pennsylvania. Common Cause promotes, on a nonpartisan basis, its members' interests in social improvement and civic betterment in the U.S. and Pennsylvania by seeking reform of the electoral process. The members of
Common Cause include over 10,000 citizens of Pennsylvania who have been, are and intend to be registered voters for candidates for the General Assembly of Pennsylvania. Petitioner and its members have a direct interest in ensuring that apportionment of voters among legislative districts is done in accordance with the Constitution of this Commonwealth.

3. Petitioner Thomas H. DeWall is an individual voter, taxpayer and citizen of the Commonwealth of Pennsylvania, residing at 208 High Street, Summerdale, Cumberland County, Pennsylvania, acting for himself and in his capacity as Executive Director of Common Cause in Pennsylvania.


5. Respondent, Legislative Reapportionment Commission, is the commission constituted pursuant to Article 2 § 17 of the Pennsylvania Constitution and charged with establishing a plan which apportions the Commonwealth, so as to establish the boundaries for legislative districts of both houses of the General Assembly of Pennsylvania.

6. The Legislative Reapportionment Commission is required to file a plan which conforms with Article 2, Section 16, of the Constitution, which reads as follows:

The Commonwealth shall be divided into fifty senatorial and two hundred three representative districts, which shall be composed of
compact and contiguous territory as nearly equal in population as practicable. Each senatorial district shall elect one Senator, and each representative district one Representative. Unless absolutely necessary no county, city, incorporated town, borough, township or ward shall be divided in forming either a senatorial or representative district.


8. Petitioner Common Cause, through Petitioner DeWall and others, timely filed exceptions to that plan pursuant to the same section (attached as an exhibit hereto).

9. Respondent promulgated its final plan, pursuant to the same section of the Constitution, on October 13, 1981.

10. Said final plan did not address the exceptions presented to Respondent by Petitioners, and did not remedy the constitutional infirmities raised by Petitioners.

11. The final plan promulgated by Respondent is contrary to the requirements of Pa. Const. Art. 2, § 16, in that in promulgating a plan for the apportionment of Senatorial and Representative districts, the Respondent caused counties, cities, boroughs, townships and wards to be divided when it was not "absolutely necessary" to do so.

12. Said final plan violates Article 2, Section 16, in that a substantial portion of said districts are not composed of "compact" territory needed to reflect the proper compatibility of political, geographic, social and historical entities.
13. Said final plan improperly and unconstitutionally attempted to achieve a goal of exact equality of population when the Constitution requires a test of substantial equality of population and that such equality be obtained only when practicable and in keeping with the other requirements of Section 16, as set forth above.

14. Said improper division of political subdivisions, lack of compactness, and an attempt to achieve a goal of exact equality of population are the result of unconstitutional, arbitrary and capricious actions by Respondent.

15. The actions of Respondent have denied the citizens of this Commonwealth proper legislative representation and electoral competition, which are fundamental to the political process as guaranteed by the Constitution and laws of this Commonwealth.

16. Alternative plans are readily available (one will be submitted as an example in Petitioners' brief) which achieve a practicable equality of population and compactness without the arbitrary division of political subdivisions, as done by Respondent in its final plan.

THEREFORE, Petitioners request Your Honorable Court to find that the final reapportionment plan is contrary to the Constitution and laws of this Commonwealth and to remand the plan to Respondent to lawfully and properly reappoint the Commonwealth, giving due regard to substantial equality of
population, compactness and the requirement not to divide political subdivisions unless absolutely necessary.

Respectfully submitted,

By: Larry B. Selkowitz
   Widoff, Reager, Selkowitz & Adler, P.C.
   1104 Fernwood Avenue
   Camp Hill, PA 17011

By: Andrew S. Ross
   1017 North Front Street
   Harrisburg, PA 17102
   Counsel for Petitioners

Dated: November 12, 1981
VERIFICATION

Subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities), I hereby declare that I am the Executive Director of Common Cause in Pennsylvania; that as such officer I am authorized to make this Verification on behalf of Common Cause; and that the facts set forth in the foregoing Petition for Review are true and correct to the best of my knowledge, information and belief.

Thomas DeWall
VERIFICATION

Subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities), I hereby declare that the facts set forth in the foregoing Petition for Review are true and correct to the best of my knowledge, information and belief.

[Signature]

Thomas DeWall