

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

TERRENCE WISE, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-CV29597

Division 15

ELIZABETH HEALEY, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-CV31273

Division 15

**JOINT STIPULATION OF FACTS & EXHIBITS**

The Parties stipulate to the following facts and to the admissibility of the following exhibits. Matters contained in exhibits but not expressly discussed in a stipulation are part of the record and may be cited by the Parties. By stipulating to the admission of an exhibit, the Parties do not thereby concede the weight it should be given by the Court.

**I. PARTIES**

**A. *Wise and Healey Plaintiffs***

1. The Parties stipulate to the admission of Plaintiffs' Exhibits (PX) 1-20, which are affidavits setting forth certain biographical facts about each Plaintiff.

2. Incorporating the facts stipulated to by the Parties and admitted into evidence as PX 1-4, Plaintiffs Terrence Wise, Aimee Riederer Gromowsky, Cynthia Wrehe, and Cynthia Kay

Lakin are all U.S. citizens and taxpayers who reside in and are registered to vote in Missouri. Each of these plaintiffs is a qualified voter pursuant to Article VIII, § 2 of the Missouri Constitution. Each of these plaintiffs voted in the 2022 and 2024 general elections and intend to vote in future congressional elections and in other elections in which they are eligible to vote. Under the congressional maps enacted in 2022 and 2025, each of these plaintiffs previously resided, and will reside, in the districts articulated in their admitted affidavits.

3. Incorporating the facts stipulated to by the Parties and admitted into evidence as PX 5-20, Plaintiffs Elizabeth Healey, Giselle Anatol, Marques Bussey, Mary Sapp, Louie Wright, Sarah Beagle, Kyle Heard, Tom Self, Janet Sorrells, Margaret Wolf Freivogel, Sorin Nastasia, Morton Todd, Colleen Coble, Beverly Rollings, Lane Nichols-Elliott, and Randal McCallian are all U.S. citizens and taxpayers who reside in and are registered to vote in Missouri. Each of these plaintiffs is a qualified voter pursuant to Article VIII, § 2 of the Missouri Constitution. Each of these plaintiffs voted in the 2022 and 2024 general elections and intends to vote in future congressional elections and in other elections in which they are eligible to vote. Under the congressional maps enacted in 2022 and 2025, each of these plaintiffs previously resided, and will reside, in the districts articulated in their admitted affidavits.

### **C. Defendants**

4. Defendant Secretary of State Denny Hoskins serves as the state's chief election officer. His duties with regard to elections in Missouri are defined by art. IV, § 18 of the Missouri Constitution and §§ 28.035, 115.136, 115.353, 115.387, 115.401, 115.511, RSMo.<sup>1</sup>

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<sup>1</sup> Unless otherwise noted, all statutory citations are to Revised Statutes of Missouri (2016), as updated, and all Rule references are to Missouri Supreme Court Rules, as updated.

5. Defendant Hoskins's office transmits a shapefile of new redistricting plans to local election authorities ("LEAs"), including congressional redistricting plans, after they are enacted.

6. LEAs are responsible for the administration of all local, state, and federal elections within their jurisdiction, including congressional elections. §§ 115.023, 115.043.

7. LEAs are responsible for implementing districting plans, including congressional districts within their jurisdiction, by assigning voters to the correct electoral districts and distributing ballots reflecting the correct candidates for each district.

8. Pursuant to §§ 115.015, 115.027, and 115.045, Defendant Jackson County Board of Election Commissioners ("JCEB"), Defendants Michael K. Whitehead, Henry R. Carner, Colleen M. Scott and Lyle K. Querry as commissioners of the JCEB, and Defendants Tammy Brown and Sarah Zorich as directors of the JCEB, collectively serve as the LEAs for the areas of Jackson County outside of the municipality of Kansas City (collectively to be referred to as the "JCEB Defendants").

9. The JCEB Defendants are responsible for the administration of all elections in the JCEB's jurisdiction, including congressional elections. Their responsibilities are defined by §§ 115.023, 115.043, 115.023, 115.113, 115.115, 115.079, 115.099, 115.127, 115.163, 115.247, 115.389, 115.393, 115.499, and 115.507.

10. The JCEB is responsible for implementing new districting boundaries in the jurisdiction for which the JCEB is responsible. This requires reassigning voters to new districts as necessary in the Missouri Centralized Voter System ("MCVR"). This reassignment of voters in MCVR typically occurs when there is not an election cycle in progress. An election cycle is considered in progress from 10 weeks prior to election day through to two weeks after election day when that election's results are certified (or later in the case of a recount).

11. Pursuant to §§ 115.015, 115.027, and 115.045, Defendant Kansas City Board of Election Commissioners (“KCEB”), Defendants Sarah Miller, Sharon Turner Buie, and Ralph F. Munyan II as commissioners of the KCEB, and Defendants Shawn Kieffer and Lauri Ealom as directors of the KCEB, collectively serve as the LEAs for the jurisdiction that includes the municipality of Kansas City within Jackson County (collectively referred to as the “KCEB Defendants”).

12. The KCEB Defendants are responsible for the administration of all elections in the municipality of Kansas City within Jackson County, including congressional elections. Their responsibilities are defined by §§ 115.023, 115.043, 115.023, 115.113, 115.115, 115.079, 115.099, 115.127, 115.163, 115.247, 115.389, 115.393, 115.499, and 115.507.

13. The KCEB is responsible for implementing new districting boundaries in the jurisdiction for which the KCEB is responsible. This requires reassigning voters to new districts as necessary in the MCVR. This reassignment of voters in MCVR typically occurs when there is not an election cycle in progress. An election cycle is considered in progress from 10 weeks prior to election day through to two weeks after election day when that election’s results are certified (or later in the case of a recount).

14. As of January 13, 2026, JCEB and KCEB have not reassigned any voters in MCVR to new districts based on the 2025 Map.

### **C. Intervenor-Defendant**

15. Intervenor Missouri Republican State Committee is the duly established state committee of the Missouri Republican Party pursuant to § 115.603.

16. The Missouri Republican State Committee has been selected and serves in the role of representing and acting for the Missouri Republican Party in the interim between party conventions pursuant to § 115.605.

17. The Missouri Republican Party maintains “a congressional district committee for each congressional district in the state,” § 115.603.

18. The Missouri Republican Party has substantial interests in securing the election of Republican candidates to the U.S. House of Representatives, educating and turning out voters to support Republican candidates for those offices, and the expenditure of its own resources to carry out those activities.

## II. BACKGROUND ON REDISTRICTING & CENSUS

19. The U.S. Census Bureau conducts a census every ten years.

20. One purpose of this decennial census is to determine population for federal congressional apportionment.

21. In 2020, the U.S. Census Bureau conducted the 2020 Census.

22. On April 26, 2021, the U.S. Census Bureau released congressional apportionment results based on the 2020 Census indicating that Missouri was entitled to eight U.S. house representatives and certified this result to the Governor of Missouri.

23. On August 12, 2021, the U.S. Census Bureau released the 2020 Census redistricting data files (commonly known as the P.L. 94-171 data), which contain the detailed population tabulations used for redistricting.

24. The U.S. Census Bureau tabulates population and demographic data at various geographic levels, including, *inter alia*, blocks, block groups, tracts, places, counties, and voting districts (also known as voting tabulation districts or VTDs).

25. The U.S. Census Bureau produces geographic information files known as Tiger/Line shapefiles, which set out the boundaries for each geographic unit at each geographic level in each state.

26. The U.S. Census Bureau assigns each geographic unit a unique alphanumeric identifier called a geographic identifier or GEOID.

27. Blocks are the smallest geographic area at which the U.S. Census Bureau tabulates population and demographic data; all other census geographies are comprised of whole blocks.

28. Places are census-defined geographic areas that generally correspond to incorporated cities, towns, and villages (collectively, “municipalities”). Places also include other “census-designated places,” which do not correspond to incorporated municipalities.

29. VTDS are census-defined geographic areas that generally correspond to election precincts.

30. According to the 2020 Census, Missouri’s total population is 6,154,913.

31. Because Missouri has eight congressional districts, to make districts as nearly equal in population as possible, the ideal district population is 769,364, with one district containing 769,365 people.

### III. MISSOURI’S 2022 CONGRESSIONAL REDISTRICTING

32. On May 11, 2022, the Missouri General Assembly passed a congressional map drawn based on 2020 census data in House Bill 2909 (2022) (“H.B. 2909”).

33. On May 18, 2022, H.B. 2909 was approved by the Governor and delivered to the Secretary of State.

34. On May 13, 2022, an electronic file representing the district boundaries for the 2022 Congressional Map was transmitted by the Director of Elections for the Secretary of State to LEAs for use in upcoming elections.

35. The 2022 Congressional Map was used to elect the state’s congressional delegation in the 2022 and 2024 primary and general elections.

36. In 2022, the primary election to elect congressional representatives took place on August 2 and the general election took place on November 8.

37. The first day for candidate filing in 2022 for the August 2 primary election was February 22 and the last day for candidate filing was March 29.

38. The “final certification date” refers to the tenth Tuesday before an election, or the date by which the Secretary of State must formally notify election authorities responsible for conducting the election of the election, pursuant to § 115.125.

39. The final certification date for the August 2, 2022 primary election was May 24, 2022.

40. The final certification date for the November 8, 2022 general election was August 30, 2022.

41. In 2024, the primary election to elect congressional representatives took place on August 6 and the general election took place on November 5.

42. The first day for candidate filing in 2024 for the August 6 primary election was February 27 and the last day for candidate filing was March 26.

43. The final certification date for the August 6, 2024 primary election was May 28, 2022.

44. The final certification date for the November 5, 2024 general election was August 27, 2024.

45. There is no requirement in Missouri that a congressional candidate reside in the congressional district the candidate seeks to represent.

46. In 2022 and 2024, CD 5 voters reelected incumbent Democratic Rep. Emmanuel Cleaver to represent their district.

47. Rep. Cleaver has represented CD 5 since he was first elected to Congress in 2004.

48. In 2022, CD 4 voters elected Republican Rep. Mark Alford and reelected him to represent their district in 2024.

49. In 2022 and 2024, CD 6 voters reelected incumbent Republican Rep. Sam Graves to represent their district.

50. In both 2022 and 2024, Republican candidates prevailed in six of the eight congressional districts (CDs 2, 3, 4, 6, 7, and 8), while Democratic candidates prevailed in CDs 1 and 5.

#### **IV. MISSOURI'S 2025 CONGRESSIONAL REDISTRICTING**

51. On August 29, 2025, Governor Kehoe issued a Proclamation calling an extraordinary session of the General Assembly. The proclamation identified congressional redistricting as one of the reasons for calling the extraordinary session.

52. Along with the Proclamation, the Governor released a congressional map he called the "Missouri First Map."

53. On September 3, 2025, Rep. Dirk Deaton introduced the Missouri First Map as H.B. 1.

54. On September 4, 2025, the House Special Committee on Redistricting held a public hearing on H.B. 1.

55. On September 5, 2025, the House Legislative Rules Committee held a public hearing on H.B. 1 and advanced the map out of committee by a majority vote.

56. On September 8, 2025, the floor debate for H.B. 1 began and was reported 'do pass' to the Missouri House of Representatives.

57. The Missouri House of Representatives passed H.B. 1 on September 9, 2025.
58. On September 11, 2025, the Senate Committee on Local Government, Elections, and Pensions held a public hearing on H.B. 1 and advanced the map out of committee by a majority vote.
59. On September 12, 2025, H.B. 1 was reported 'do pass' to the Senate and was passed by the Senate.
60. On September 28, 2025, Governor Kehoe signed H.B. 1 into law.
61. In 2026, the primary election to elect congressional representatives in Missouri is scheduled for August 4.
62. In 2026, the general election is scheduled for November 3.
63. The first day for candidate filing in 2026 for the August 4 primary election is February 24 and the last day for candidate filing is March 31.
64. The final certification date for the August 4, 2026 primary election is May 26, 2026.
65. The final certification date for the November 3, 2026 general election is August 25, 2026.
66. In 2026, municipal election day is scheduled for April 7, 2026.
67. The final certification date for the April 7, 2026 municipal election is January 27, 2026.
68. Pursuant to § 115.507, the deadline for announcement and certification of the election results for municipal elections taking place on April 7 is the second Tuesday thereafter, April 21, 2026.

**V. STIPULATED FACTS CONCERNING CONGRESSIONAL MAPS**

69. CD 4 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the Voting Rights Act of 1965 (“VRA”) to provide a racial minority group with requisite opportunity to elect candidates of choice.

70. CD 5 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the VRA to provide a racial minority group with requisite opportunity to elect candidates of choice.

71. CD 6 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the VRA to provide a racial minority group with requisite opportunity to elect candidates of choice.

72. No court has ruled that any district in the 2022 Congressional Map was in violation of the VRA.

73. No court has ruled that any district in the 2022 Congressional Map was in violation of the Equal Protection Clause of the U.S. Constitution.

74. The boundary line between Senate District 7 and Senate District 9 runs down the same portion of Troost Avenue as the boundary line between the 2025 Congressional Map’s District 5 and District 4.

75. The boundary line between Senate District 7 and Senate District 9 shifts west from Troost Avenue to Holmes Road at the same point that the 2025 Congressional Map shifts west from Troost Avenue to Holmes Road.

76. The 2022 Congressional Map does not include all of the Clay County section of Kansas City in CD 5.

77. Portions of the City of Kansas City were located within CDs 4, 5, and 6 under the 2022 Congressional Map.

78. Portions of Jackson County were located within CDs 4, 5, and 6 under the 2022 Congressional Map.

**VI. VOTING TABULATION DISTRICT (VTD) KC 811**

79. There are two VTDs within Kansas City named “KC 811” by the U.S. Census Bureau.

80. The two VTDs named “KC 811” are not contiguous.

81. One of the VTDs named “KC 811” has a GEOID from the 2020 Census of 29095K16811.

82. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095K16811 has a total population of 32.

83. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095K16811 is bounded by a portion of Rockhill Road, by a portion of East 69th Street, and by a portion of Oak Street.

84. The second VTD named “KC 811” has a GEOID from the 2020 Census of 29095000484.

85. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095000484 has a total population of 843.

86. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095000484 is bounded by a portion of East 70th St., by a portion of Troost Avenue, by a portion of East 75th St., and by a portion of Holmes Rd.

87. The bill text of H.B. 1 states that “The fourth congressional district shall be composed of” several geographic units including “VTD: KC 811.”

88. The bill text of H.B. 1 states that “The fifth congressional district shall be composed of” several geographic units including “VTD: KC 811.”

89. The bill text of H.B. 1 does not refer to geographic units by their GEOID.

90. Defendant Hoskins’s office provided the shapefiles for the 2025 Congressional Map to LEAs.

91. The shapefiles were also accessible online in advance of Defendant Hoskins’s official transmission to LEAs.

92. The shapefile assigns “KC 811” with a GEOID from the 2020 Census of 29095K16811 to District 4.

93. CD 4 in the shapefile is contiguous and equi-populous with other Missouri congressional districts.

94. The shapefile assigns “KC 811” with a GEOID from the 2020 Census of 29095000484 to District 5.

95. CD 5 in the shapefile is contiguous and equi-populous with other Missouri congressional districts.

## **VI. EXPERT WITNESSES**

96. The Parties stipulate to the admission of all expert reports exchanged in this case for all experts who will be called to testify, which include the following exhibits:

- a. PX 21 - Expert Report of Dr. Ari Stern (amended 12/30/2025)
- b. PX 22 - Rebuttal Expert Report of Dr. Ari Stern (1/14/2026)
- c. PX 23 - Expert Report of Dr. Jonathan Cervas (amended 12/30/2025)
- d. PX 24 - Rebuttal Expert Report of Dr. Jonathan Cervas (1/14/2026)
- e. PX 25 - Expert Report of Dr. John Cromartie (12/22/2025)
- f. PX 26 - Rebuttal Expert Report of Dr. John Cromartie (1/14/2026)

- g. PX 27 - Expert Report of Dr. Jonathan Rodden (12/22/2025)
- h. PX 28 - Rebuttal Expert Report of Dr. Jonathan Rodden (1/14/2026)
- i. DX 101 - Expert Report of Dr. Sean P. Trende (1/7/2026)
- j. IX 201 - Expert Report of Dr. M.V. Hood III (1/6/2026)

97. The Parties stipulate to the following expert qualifications:

- a. Dr. Ari Stern is qualified as an expert in applied and computational mathematics, redistricting, and ensemble analysis.
- b. Dr. Jonathan Cervas is qualified as an expert in political science, redistricting, drawing redistricting maps, and census data.
- c. Dr. John Cromartie is qualified as an expert in population geography, rural demography, and urban-rural classification.
- d. Dr. Jonathan Rodden is qualified as an expert in redistricting; political economic, and social geography; applied statistics; geographic information systems; political science; and quantitative methods.
- e. Dr. M.V. Hood is qualified as an expert in American politics, redistricting, and quantitative political science.
- f. Dr. Sean Trende is qualified as an expert in American politics with an emphasis on elections, redistricting, and political methodology, as well as redistricting simulations.

Dated: February 11, 2026

Respectfully submitted,

/s/ Gillian R. Wilcox  
Gillian R. Wilcox, MO #61278  
Jason Orr, MO # 56607  
**ACLU of Missouri Foundation**  
406 W. 34th Street, Suite 420

/s/ J. Andrew Hirth  
J. Andrew Hirth, #57807  
**TGH LITIGATION LLC**  
28 N. 8th St., Suite 200  
Columbia, MO 65201

Kansas City, MO 64111  
Phone: (816) 470-9938  
Fax: (314) 652-3112  
gwilcox@aclu-mo.org  
Jorr@aclu-mo.org

Kristin M. Mulvey, MO # 76060  
Jonathan D. Schmid, MO # 74360  
ACLU of Missouri Foundation  
906 Olive Street, Suite 1130  
St. Louis, MO 63101  
Phone: (314) 652-3114  
kmulvey@aclu-mo.org  
jschmid@aclu-mo.org

Mark P. Gaber\*  
Aseem Mulji\*  
Simone Leeper\*  
Benjamin Phillips\*  
Isaac DeSanto\*

**Campaign Legal Center**

1101 14<sup>th</sup> St NW Suite 400  
Washington, DC 20005  
Phone: (202) 736-2200  
mgaber@campaignlegalcenter.org  
amulji@campaignlegalcenter.org  
sleeper@campaignlegalcenter.org  
bphillips@campaignlegalcenter.org  
idesanto@campaignlegalcenter.org

Annabelle Harless\*

**Campaign Legal Center**

55 W. Monroe St., Ste. 1925  
Chicago, IL 60603  
Phone: (202) 736-2200  
aharless@campaignlegalcenter.org

Ming Cheung\*

Dayton Campbell-Harris\*

Sophia Lin Lakin\*

**ACLU Foundation**

125 Broad Street, 18th Floor  
New York, New York 10004  
Phone: (212) 549-2500  
mcheung@aclu.org  
dcampbell-harris@aclu.org

Telephone: (573) 256-2850  
andy@tghlitigation.com

Abha Khanna\*

**ELIAS LAW GROUP LLP**

1700 Seventh Avenue, Suite 2100  
Seattle, WA 98101  
(206) 656-0177  
akhanna@elias.law

Harleen Kaur Gambhir\*

Tina Meng Morrison\*

Julianna D. Astarita\*

**ELIAS LAW GROUP LLP**

250 Massachusetts Ave. NW, Suite 400  
Washington, D.C. 20001  
Telephone: 202-968-4490  
hgambhir@elias.law  
tmengmorrison@elias.law  
jastarita@elias.law

*Attorneys for Healey Plaintiffs*

**ELLINGER BELL LLC**

By: */s/ Marc H. Ellinger*

Marc H. Ellinger, #40828  
Stephanie S. Bell, #61855  
308 East High Street, Suite 300  
Jefferson City, MO 65101  
Telephone: (573) 750-4100  
Facsimile: (314) 334-0450  
E-mail: [mellinger@ellingerlaw.com](mailto:mellinger@ellingerlaw.com)  
E-mail: [sbell@ellingerlaw.com](mailto:sbell@ellingerlaw.com)

**JONES DAY**

By: */s/ John M. Gore*

John M. Gore (*pro hac vice*)

Nathaniel C. Sutton (*pro hac vice*)

51 Louisiana Ave., NW

Washington, DC 20001

Telephone: (202) 879-3930

Facsimile: (202) 626-1700

E-mail: [jmgore@jonesday.com](mailto:jmgore@jonesday.com)

E-mail: [nsutton@jonesday.com](mailto:nsutton@jonesday.com)

*Attorneys for Intervenor*

slakin@aclu.org

*Attorneys for Wise Plaintiffs*

*\*Admission pro hac vice*

**CATHERINE L. HANAWAY**

ATTORNEY GENERAL

/s/ Louis J. Capozzi III

Louis J. Capozzi III, #77756

*Solicitor General*

Kathleen T. Hunker, *adm. pro hac vice*

*Principal Deputy Solicitor General*

Patrick Sullivan, #42968

*Deputy Solicitor General*

Joseph Kiernan, #77798

*Assistant Solicitor General*

Madeline S. Lansdell, #78538

*Assistant Solicitor General*

Matthew J. Tkachuk, #74874

*Assistant Attorney General*

Office of the Attorney General

Old Post Office Building

815 Olive St, Suite 200

St. Louis, MO 63101

Office: (314) 340-3413

[louis.capozzi@ago.mo.gov](mailto:louis.capozzi@ago.mo.gov)

[kathleen.hunker@ago.mo.gov](mailto:kathleen.hunker@ago.mo.gov)

[patrick.sullivan@ago.mo.gov](mailto:patrick.sullivan@ago.mo.gov)

[joseph.kiernan@ago.mo.gov](mailto:joseph.kiernan@ago.mo.gov)

[madeline.lansdell@ago.mo.gov](mailto:madeline.lansdell@ago.mo.gov)

[matthew.tkachuk@ago.mo.gov](mailto:matthew.tkachuk@ago.mo.gov)

*Attorneys for State Defendants.*

### **Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was filed and served electronically on all counsel of record via the Court's e-filing system on February 11, 2026.

/s/ Gillian R. Wilcox