

In The  
Supreme Court of the United States  
March 2022

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CONGRESSMAN GLENN  
GROTHMAN, CONGRESSMAN  
MIKE GALLAGHER,  
CONGRESSMAN BRYAN STEIL,  
CONGRESSMAN TOM TIFFANY,  
CONGRESSMAN SCOTT  
FITZGERALD,

Applicants,

v.

MARGE BOSTELMANN, IN HER  
OFFICIAL CAPACITY AS A  
MEMBER OF THE WISCONSIN  
ELECTIONS COMMISSION, ET AL.,

Respondents.

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ON APPLICATION FOR STAY, OR, IN THE ALTERNATIVE, ON PETITION FOR  
A WRIT OF CERTIORARI TO THE WISCONSIN SUPREME COURT

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**DECLARATION OF GREGORY G. GRUBE, GIS SPECIALIST OF THE  
WISCONSIN ELECTIONS COMMISSION**

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**GREGORY G. GRUBE**, declares as follows, under penalty of perjury  
pursuant to 28 U.S.C. § 1746:

1. I am employed as the Geographic Information System (GIS) Specialist  
of the Wisconsin Elections Commission (“the Commission”). I have held this position  
since May 1, 2017.

2. The Commission is a governmental agency responsible for  
administering election laws in Wisconsin. The Commission is tasked with

implementing redistricting changes into the state's voter registration system, WisVote.

3. I was aware that the Wisconsin Supreme Court, in *Johnson, et al. v. Wisconsin Elections Commission, et al.*, No. 2021AP1450-OA (Supreme Court of Wisconsin), issued a decision on March 3, 2022, that chose the plan (i.e., maps for state assembly, state senate, and congressional seats) submitted by Governor Tony Evers for the purpose of redistricting state legislative and congressional districts in the state of Wisconsin. This redistricting plan split some local municipal wards, among other things.

4. Upon the Wisconsin Supreme Court's decision, Commission staff has performed preliminary implementation work using information in its possession. Some of that work has been tailored to implementing the particular plan approved on March 3. And all of this work has taken place outside WisVote.

5. If the Commission is required to implement maps for the next election other than those approved by the Wisconsin Supreme Court, some of this aforementioned necessary work would need to be redone.

6. Also, the Commission needs to carry out additional work to implement the maps chosen by the Wisconsin Supreme Court.

7. Today the Commission received district data from the Wisconsin Legislative Technology Services Bureau (LTSB), with a list of municipalities (and wards within those municipalities) that are being split. These materials will allow the Commission to contact those municipalities and counties. In turn, those local

governments will then be able to determine where new congressional (and state legislative) district lines require existing wards to be split or renumbered. These local governments will then need to provide that information to the Commission so staff can update WisVote before April 15, 2022. It is my layman's understanding that this is the date, pursuant to Wis. Stat. § 8.15(1), by which nomination papers may begin to be circulated for signatures by candidates for congressional and state legislative seats running for office in the next election.

8. It is also my layman's understanding that if a congressional (or state legislative) redistricting plan establishes a district boundary that does not coincide with a ward established under a municipality's ordinance or resolution, Wis. Stat. § 5.15(4) provides that the municipal governing body must amend the ordinance or resolution by April 10, 2022.

9. Once the Governor's map boundaries are updated in WisVote, Commission staff must integrate the new redistricting data with existing voter registration and address data, and must manually review ward map changes to ensure that each voter is correctly located in their proper districts.

10. Receipt of the aforementioned data and information from LTSB took longer than the Commission expected, and staff must immediately begin these tasks using the data and information for the maps approved by the Wisconsin Supreme Court.

11. Implementing maps other than those approved by the Wisconsin Supreme Court creates a grave risk of introducing significant inaccuracies into the

WisVote system. Further, if a stay were entered, local governments might not have enough time to act on the ward splits and candidates and voters might not know in which districts they reside.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY THAT THE STATEMENTS IN THIS DECLARATION ARE TRUE AND CORRECT AND BASED UPON MY PERSONAL KNOWLEDGE.

Dated this 14th day of March 2022.

/s/ Gregory G. Grube  
GREGORY G. GRUBE