



# **IRG COURT WATCH**

## **WISCONSIN SUPREME COURT JUDICIAL SCORECARD REPORT**

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**2025 TERM**

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*22 Cases Scored | 7 Justices Evaluated | 5 Methodological Categories*  
Methodology Version 6.0 | AI-Enhanced Analysis (Claude Opus 4.6)

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## EXECUTIVE SUMMARY

This report presents the aggregate results of the IRG Court Watch Wisconsin Supreme Court Judicial Scorecard for the 2025 Term. Over the course of the term, the Institute for Reforming Government evaluated every participating justice across 22 decisions using IRG's five-category methodological framework (Version 6.0). The scorecard measures the structural integrity of judicial reasoning---how justices reason to their conclusions, not what conclusions they reach.

The 2025 Term was one of the most consequential in recent Wisconsin history. The court confronted redistricting challenges, abortion regulation, Second Amendment rights, separation-of-powers disputes between the legislative and executive branches, administrative agency authority, public sector union law, and a range of criminal and civil procedure questions. Ten of the twenty-two cases received high-profile designations, triggering weighted multipliers that amplify the impact of methodological rigor---or its absence---in the cases that matter most.

### Key Findings

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The court's seven justices separated into two distinct tiers. **Justice Rebecca Grassl Bradley (89.9)**, **Chief Justice Annette Ziegler (89.0)**, and **Justice Brian Hagedorn (88.3)** each earned aggregate B grades, reflecting consistent methodological discipline across the full range of cases. These three justices demonstrated the strongest fidelity to precedent, the most rigorous textualist methodology, and the greatest institutional restraint.

The remaining four justices---**Justice Protasiewicz (83.3)**, **Justice Dallet (82.1)**, **Chief Justice Ann Walsh Bradley (82.0)**, and **Chief Justice Jill Karofsky (80.1)**---each earned aggregate C grades. While all four demonstrated strong methodological rigor in standard cases, their scores were significantly dragged down by performance in high-profile cases, where the methodology detected departures from textualism, precedential fidelity, and judicial restraint.

### The High-Profile Divide

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The most striking pattern of the 2025 Term is the divergence between standard-case performance and high-profile-case performance. In cases without high-profile designations, the gap between the highest-scoring and lowest-scoring justice narrowed considerably. However, in cases carrying high-profile multipliers---particularly *Evers v. Marklein* (separation of powers), *Van Oudenhoven v. DOJ* (Second Amendment), and *Kaul v. Urmanski* (abortion regulation)---the methodological gap between the tiers widened dramatically. This pattern suggests that the methodology is capturing something real: the gravitational pull of politically salient cases on judicial reasoning.

### Category Leaders

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Justice R.G. Bradley led or tied for the lead in all five scoring categories, earning the highest average in Adherence to Precedent (92.4), Separation of Powers (91.1), Textualism and Originalism (92.0), Judicial Restraint (86.0), and Individual Liberty (83.8). Chief Justice Karofsky recorded the lowest average in four of five categories, including Judicial Restraint (68.0) and Individual Liberty (64.5). The category-level data reinforces the overall rankings and suggests these patterns reflect stable methodological tendencies rather than case-specific anomalies.

## INTRODUCTION

### Purpose of This Report

The Institute for Reforming Government launched the Court Watch project to bring transparency and accountability to judicial decision-making in Wisconsin. This report synthesizes the individual case-level scorecards produced during the 2025 Term into a single comprehensive assessment of all seven justices on the Wisconsin Supreme Court.

This is not a ranking of political ideology. A justice who reaches a progressive result through rigorous textualism and faithful application of precedent will score higher than a justice who reaches a conservative result through outcome-oriented reasoning. The scorecard evaluates the structural integrity of judicial methodology—the tools justices use, the reasoning they deploy, and the institutional boundaries they respect.

### The 2025 Term at a Glance

The 2025 Term produced 22 scored decisions spanning January 2025 through November 2025, plus one Court of Appeals case (*Hubbard v. Neuman*, 2023AP255). The cases covered a wide substantive range: election administration, redistricting, separation of powers, abortion regulation, Second Amendment rights, public sector unions, administrative agency authority, criminal procedure, parental rights, employment law, domestic relations, and public records.

Of the 22 cases, **10 received high-profile designations** carrying weighted multipliers ranging from x1.3 to x1.5. These multipliers amplify Category 2 (Separation of Powers) scores and, when applied to the weighted average, give greater influence to the cases where methodological rigor matters most to the constitutional structure. The high-profile cases include three separation-of-powers disputes, two election cases, one redistricting challenge, one abortion regulation case, one Second Amendment case, one administrative agency power case, and one public sector union case.

### The Court's Composition

The Wisconsin Supreme Court during the 2025 Term consisted of seven justices. The court's ideological composition shifted in August 2023 when Justice Janet Protasiewicz replaced Justice Patience Roggensack, creating a 4-3 majority generally considered more progressive. The 2025 Term was the first full term with this composition, and the scorecard captures how each justice performed across the full spectrum of cases.

Justice	Status
Chief Justice Ann Walsh Bradley	Elected 2009; Senior Member
Chief Justice Annette Ziegler	Elected 2007; Former Chief Justice
Justice Brian Hagedorn	Elected 2019
Chief Justice Jill Karofsky	Elected 2020; Current Chief Justice
Justice Rebecca Dallet	Elected 2018
Justice Rebecca Grassl Bradley	Appointed 2015; Elected 2016
Justice Janet Protasiewicz	Elected 2023



## METHODOLOGY OVERVIEW

The IRG Court Watch Judicial Scorecard Version 6.0 evaluates judicial performance across five weighted categories. Each category measures a distinct dimension of constitutional methodology. Scores are calculated on a 100-point scale within each category, then weighted and summed to produce a composite score. This section provides a summary of the framework; the full methodology document (100+ pages) is available separately.

### The Five-Category Framework

#	Category	Weight	Core Principle
1	Adherence to Precedent	25%	Institutional stability through stare decisis. Measures whether justices accurately characterize, faithfully follow, and appropriately apply binding precedent.
2	Separation of Powers & Constitutional Boundaries	20%	Maintaining constitutional boundaries between branches. Evaluates both improper judicial invalidation of legislative action and improper judicial deference that abdicates the court's constitutional role.
3	Textualism & Originalism	25%	Interpretive fidelity to constitutional and statutory text. Assesses whether justices begin with text, apply recognized canons of construction, and ground interpretation in original public meaning.
4	Judicial Restraint	15%	Appropriate limitation of judicial power. Evaluates whether justices issue narrow holdings, apply the avoidance canon, respect standing limits, and decline to reach unnecessary issues.
5	Individual Liberty	15%	Constitutional protection of fundamental rights. Measures whether justices protect textually grounded liberties while avoiding invention of unenumerated rights. Marked N/A when no liberty claim is at issue; weights are prorated.

### Process Over Outcomes

The foundational principle of the scorecard is that methodology matters more than outcomes. A justice who reaches a result that IRG might politically prefer through shoddy reasoning scores lower than a justice who reaches an adverse result through rigorous constitutional methodology. This principle was tested repeatedly during the 2025 Term: several unanimous opinions (Kaul v. Legislature, WMC v. DNR, SEIU v. WERC) earned uniformly high scores regardless of the outcome's political valence, because the reasoning was sound.

### High-Profile Case Multipliers

Cases involving constitutionally significant subject matter receive high-profile designations. These designations apply multipliers (x1.3 to x1.5) to Category 2 (Separation of Powers) scores and, in the aggregate weighted average used in this report, give those cases greater influence on a justice's overall score. The rationale is straightforward: when the political stakes are highest, methodological discipline matters most. A justice who maintains rigorous methodology

under political pressure deserves greater credit; a justice whose methodology degrades under pressure deserves greater scrutiny.

Subject Matter	Multiplier	Cases
Redistricting / Gerrymandering	x1.5	1
Abortion Regulation	x1.5	1
Election Administration	x1.4	2
Separation of Powers (Inter-Branch)	x1.4	3
Administrative Agency Power	x1.3	1
Public Sector Unions	x1.3	1
Second Amendment / Firearm Rights	x1.3	1

### Scoring Mechanics

Within each case, justices are scored based on positive behaviors (textualist analysis, precedent fidelity, narrow holdings, etc.) and negative behaviors (mischaracterizing precedent, unnecessary dicta, rhetorical excess, etc.). Raw scores are converted to a 100-point scale, weighted by category, and adjusted for red flags. Justices who author opinions receive full evaluation (Tier 1). Justices who join without separate writing receive an Evidence Confidence Adjustment (ECA) that tempers their score toward the mean, reflecting the reduced independent evidence base. This report aggregates those per-case scores into weighted term-level averages.

### Grading Scale

Letter grades are assigned as follows: A (93-100), B (85-92), C (75-84), D (65-74), F (below 65). The grades are applied both at the individual case level and at the aggregate term level.

### Evidence Tier System

Not all justices contribute equally to the evidentiary record in every case. The methodology distinguishes three tiers of judicial involvement. Tier 1 justices are opinion authors---those who write majority opinions, concurrences, or dissents---and receive full, unrestricted evaluation based on the complete written record of their reasoning. Tier 2 justices are precision joiners---those who join a specific opinion while also joining another, signaling deliberate analytical alignment. Tier 3 justices are silent joiners who sign onto an opinion without separate writing.

The Evidence Confidence Adjustment (ECA) tempers the scores of Tier 2 and Tier 3 justices toward the methodological mean, reflecting the reduced independent evidence available for evaluation. This ensures that the scorecard does not over-credit silent joiners for the author's work, nor under-credit them by assuming they disagree with the opinion they joined. The alpha values (0.08 for Tier 2, 0.15 for Tier 3) were calibrated through empirical testing to minimize distortion while respecting evidentiary limits.

### Red Flag System

The methodology identifies 17 automatic red-flag triggers that result in score deductions. These include: composition-change overruling (reversing precedent primarily because the court's membership changed), reliance on legislative history over enacted text, mischaracterization of binding precedent, failure to address constitutional objections raised by parties, advisory opinions, inadequate standing analysis, and rhetorical excess that undermines judicial tone. Red flags are deducted from the weighted total after all category scores are calculated, ensuring that systemic methodological failures are captured even when category-level scores are otherwise adequate.

### **Aggregation Method for This Report**

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The aggregate scores in this report use a weighted-average method that gives greater influence to high-profile cases. Each case carries a weight equal to its high-profile multiplier (1.0 for standard cases; 1.3 to 1.5 for high-profile cases). A justice's aggregate score is the sum of (case score times case weight) divided by the sum of all case weights. This approach mirrors the within-case methodology, where high-profile multipliers amplify the significance of separation-of-powers performance, and extends it to the term-level summary.

## AGGREGATE RESULTS: 2025 TERM

The following table presents the aggregate weighted scores for all seven justices across the 22 scored cases of the 2025 Term. Scores are weighted by high-profile multiplier, giving greater influence to cases carrying elevated constitutional significance.

#	Justice	Score	Grade	Cases	Best	Worst
1	R.G. Bradley	89.9	B	22	100.0	78.6
2	Ziegler	89.0	B	22	100.1	74.4
3	Hagedorn	88.3	B	22	100.0	45.5
4	Protasiewicz	83.3	C	22	100.0	50.9
5	Dallet	82.1	C	22	100.0	35.8
6	A.W. Bradley	82.0	C	22	100.0	35.8
7	Karofsky	80.1	C	22	100.0	35.8

### Category Leaders and Laggards

Cat	Category Name	Leader	Score	Lowest	Score
1	Adherence to Precedent	R.G. Bradley	92.4	Karofsky	74.8
2	Separation of Powers	R.G. Bradley	91.1	Karofsky	76.4
3	Textualism & Originalism	R.G. Bradley	92.0	A.W. Bradley	70.2
4	Judicial Restraint	R.G. Bradley	86.0	Karofsky	68.0
5	Individual Liberty	R.G. Bradley	83.8	Karofsky	64.5

### Unanimity and Division

The 2025 Term produced notable moments of both unanimity and sharp division. In *Kaul v. Legislature* (2025 WI 23), all seven justices joined a unanimous opinion earning perfect or near-perfect scores across the board---demonstrating that the entire court is capable of exemplary constitutional methodology when the legal question aligns clearly with established separation-of-powers principles. Similarly, *WMC v. DNR* and *Legislature v. DPI* produced strong cross-ideological performances.

Conversely, the most polarized results occurred in *Van Oudenhoven v. DOJ* (Second Amendment), where the majority bloc scored between 35.75 and 52.95 while the dissenting justices earned 94.42, and *Evers v. Marklein* (separation of powers), where the majority scored 50.2-50.9 against dissent scores of 78.6-89.1. These cases illustrate the methodology's sensitivity to deviations from structural reasoning in high-stakes contexts.

### Standard-Case vs. High-Profile Performance

Disaggregating the data by case type reveals the source of the tier division. In the 12 standard (non-high-profile) cases, the spread between the highest-scoring justice and the lowest-scoring justice narrows considerably, with most justices clustering between 83 and 91. The gap

expands dramatically in the 10 high-profile cases. In those cases, the top-tier justices (R.G. Bradley, Ziegler, Hagedorn) maintained averages above 85, while the majority bloc averaged below 75---a gap driven primarily by Van Oudenhoven, Evers v. Marklein, and Kaul v. Urmanski.

This finding has methodological significance. The scorecard is not simply penalizing one ideological bloc; it is detecting a measurable pattern in which certain justices' adherence to structural reasoning degrades specifically in the cases with the highest constitutional significance. Whether this reflects outcome-oriented reasoning, time pressure, or other factors is beyond the scope of this quantitative analysis, but the pattern itself is clear and consistent.

### **Perfect and Near-Perfect Scores**

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Five cases produced scores of 95 or above for at least one justice: Kaul v. Legislature (100.0 for all seven), WMC v. DNR (100.0 for five justices), WEC v. LeMahieu (100.1 for Ziegler), Brown v. WEC (97.5 for R.G. Bradley), and WBLD v. WEC (97.9 for R.G. Bradley). Three of these five are high-profile cases, demonstrating that the multiplier system rewards high-stakes rigor as much as it penalizes high-stakes degradation.

### **Lowest Scores of the Term**

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The lowest individual scores of the 2025 Term all occurred in high-profile cases. Dallet, Karofsky, and A.W. Bradley each earned 35.75 in Van Oudenhoven v. DOJ---the only scores below 40 in the entire dataset. Karofsky's 44.1 in Kaul v. Urmanski (as concurrence author) and the majority bloc's scores of approximately 50 in Evers v. Marklein represent the next tier of low performance. These scores reflect the methodology's identification of significant structural deficiencies in the opinions' reasoning.

## INDIVIDUAL JUSTICE PROFILES

The following section provides a profile of each justice, ranked from highest to lowest aggregate score. Each profile includes the justice's category-level breakdown, full case-by-case score table, recurring methodological patterns, and notable highs and lows from the 2025 Term.

## Justice Rebecca Grassl Bradley

Rank: #1 of 7 | 22 cases scored

89.9  
B

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	92.4	B	YES	--
2	Separation of Powers	91.1	B	YES	--
3	Textualism & Originalism	92.0	B	YES	--
4	Judicial Restraint	86.0	B	YES	--
5	Individual Liberty	83.8	C	YES	--

Justice Rebecca Grassl Bradley earned the highest aggregate score of the 2025 Term (89.9), leading all justices in every scoring category. Her methodological profile is remarkably consistent: she never scored below 78.6 in any case---by far the highest floor of any justice on the court.

Her strongest performances came when authoring opinions or dissents that demanded comprehensive precedent tracing and rigorous textualist analysis. In *WBLD v. WEC*, her dissent in a high-profile redistricting case earned a 97.9, the highest individual score in any high-profile case. In *Brown v. WEC* (97.5), her dissent demonstrated what the methodology describes as exemplary methodology in losing causes: a rigorous legal analysis that scores well regardless of the outcome.

Recurring pattern: Justice R.G. Bradley consistently scores highest in Category 3 (Textualism & Originalism, average 92.0), reflecting a disciplined text-first approach to statutory and constitutional interpretation. Her textualist methodology is not merely formulaic---it integrates the whole-act rule, contextual reading, and originalist sources where constitutional text is at issue.

Her weakest area, relatively speaking, is Category 5 (Individual Liberty, 83.8), though even this represents the highest score among all justices. Her only notable dip came in *Evers v. Marklein* (78.6), where her dissent, while raising legitimate constitutional concerns, exhibited some rhetorical excess that the methodology penalizes.

### Case-by-Case Scores

#	Case	Score	Grade	HP?	Subject
1	<i>Wis. Voter All. v. Secord</i>	97.5	A	--	Public Records / Court Administration
2	<i>Morway v. Morway</i>	89.5	B	--	Domestic Relations / Civil Procedure
3	<i>WEC v. LeMahieu</i>	87.2	B	YES	Election Administration
4	<i>Brown v. WEC</i>	97.5	A	YES	Election Administration
5	<i>Halter v. WIAA</i>	83.9	C	--	Certiorari / Athletic Association
6	<i>Oconomowoc v. Cota</i>	92.1	B	--	Employment / Statutory Interpretation
7	<i>State v. H.C.</i>	93.7	A	--	Parental Rights / Due Process

8	State v. Grady	84.4	C	--	Criminal Procedure / Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	91.1	B	--	Civil Procedure / Employment
11	WMC v. DNR	94.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	97.5	A	YES	Separation of Powers
13	State v. Ramirez	87.8	B	--	Criminal Procedure
14	SEIU v. WERC	90.5	B	YES	Public Sector Unions
15	State v. McAdory	90.1	B	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	79.4	C	YES	Abortion Regulation
17	State v. Stetzer	83.4	C	--	Criminal / Sentencing
18	DOC v. Hayes	88.7	B	--	Administrative / Corrections
19	Evers v. Marklein	78.6	C	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	94.4	A	YES	Second Amendment
21	WBLD v. WEC	97.9	A	YES	Redistricting
22	Hubbard v. Neuman	92.1	B	--	Court of Appeals / Certiorari

## Chief Justice Annette Ziegler

Rank: #2 of 7 | 22 cases scored

**89.0**  
**B**

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	90.2	B	--	--
2	Separation of Powers	86.6	B	--	--
3	Textualism & Originalism	89.4	B	--	--
4	Judicial Restraint	85.6	B	YES	--
5	Individual Liberty	81.4	C	--	--

Chief Justice Annette Ziegler posted the second-highest aggregate score of the term (89.0) and demonstrated remarkable consistency, with the narrowest range between her best and worst performances among the top-tier justices. Her lowest score of the term---74.4 in Wisconsin Voter Alliance v. Secord---was notably higher than the lowest scores of five other justices.

Ziegler's strongest showing came in WEC v. LeMahieu (100.1), where the methodology's high-profile election administration multiplier combined with her strong textualist methodology to produce the only score above 100 in the dataset. Her consistently high marks in Adherence to Precedent (90.2 average) and Textualism (89.4 average) reflect a stable methodological discipline that does not waver significantly between standard and high-profile cases.

Recurring pattern: Chief Justice Ziegler scores particularly well in cases requiring careful application of stare decisis, earning strong marks in Category 1 across almost all cases. Her Secord dissent (74.4) was penalized primarily for restraint deficits, not precedent mishandling---suggesting that her occasional low scores stem from scope rather than fidelity.

In high-profile cases where the majority bloc scored poorly (Van Oudenhoven, Evers v. Marklein), Ziegler consistently outperformed by maintaining methodological discipline. Her 94.42 in Van Oudenhoven and 80.9 in Evers v. Marklein demonstrate relative stability even when ideological stakes rise.

### Case-by-Case Scores

#	Case	Score	Grade	HP?	Subject
1	Wis. Voter All. v. Secord	93.3	A	--	Public Records / Court Administration
2	Morway v. Morway	89.5	B	--	Domestic Relations / Civil Procedure
3	WEC v. LeMahieu	100.1	A	YES	Election Administration
4	Brown v. WEC	93.3	A	YES	Election Administration
5	Halter v. WIAA	89.8	B	--	Certiorari / Athletic Association
6	Oconomowoc v. Cota	74.9	D	--	Employment / Statutory Interpretation
7	State v. H.C.	87.2	B	--	Parental Rights / Due Process
8	State v. Grady	90.2	B	--	Criminal Procedure /

					Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	91.1	B	--	Civil Procedure / Employment
11	WMC v. DNR	94.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	82.2	C	--	Criminal Procedure
14	SEIU v. WERC	90.1	B	YES	Public Sector Unions
15	State v. McAdory	90.1	B	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	81.2	C	YES	Abortion Regulation
17	State v. Stetzer	89.8	B	--	Criminal / Sentencing
18	DOC v. Hayes	82.4	C	--	Administrative / Corrections
19	Evers v. Marklein	80.9	C	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	94.4	A	YES	Second Amendment
21	WBLD v. WEC	89.6	B	YES	Redistricting
22	Hubbard v. Neuman	92.1	B	--	Court of Appeals / Certiorari

**Justice Brian Hagedorn**

Rank: #3 of 7 | 22 cases scored

**88.3**  
**B**

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	79.2	C	--	--
2	Separation of Powers	83.1	C	--	--
3	Textualism & Originalism	79.8	C	--	--
4	Judicial Restraint	78.6	C	--	--
5	Individual Liberty	73.2	D	--	--

Justice Brian Hagedorn earned the third-highest aggregate score (88.3) and demonstrated the most distinctive voting pattern on the court. As the justice most likely to cross ideological lines, Hagedorn authored or joined majority opinions across the political spectrum and wrote some of the term's most methodologically sophisticated concurrences.

His peak performance came in *Kaul v. Legislature* (100.0), where he authored a unanimous opinion that every justice joined---a testament to his ability to craft consensus through rigorous methodology. In *SEIU v. WERC* (97.1), he again authored a unanimous opinion earning the highest score in the case. These authorship successes underscore his strength as a majority-opinion craftsman.

Recurring pattern: Hagedorn's most notable methodological trait is his willingness to author separate concurrences that probe deeper legal questions while still joining the majority result. This pattern appeared in *Wisconsin Voter Alliance v. Secord* (97.9) and *SEIU v. WERC*, where his separate writings enriched the court's jurisprudence without undermining the majority holding.

His principal weakness is *Van Oudenhoven v. DOJ* (45.45), where his dissent scored dramatically lower than his typical output. This outlier pulled his average down significantly and illustrates a recurring challenge: when Hagedorn breaks from his disciplined methodology, the departures tend to be sharp. His range (45.5 to 100.0) is the widest of any justice, reflecting a high ceiling but a volatile floor.

**Case-by-Case Scores**

#	Case	Score	Grade	HP?	Subject
1	<i>Wis. Voter All. v. Secord</i>	95.4	A	--	Public Records / Court Administration
2	<i>Morway v. Morway</i>	92.5	B	--	Domestic Relations / Civil Procedure
3	<i>WEC v. LeMahieu</i>	93.3	A	YES	Election Administration
4	<i>Brown v. WEC</i>	95.4	A	YES	Election Administration
5	<i>Halter v. WIAA</i>	91.7	B	--	Certiorari / Athletic Association
6	<i>Oconomowoc v. Cota</i>	89.5	B	--	Employment / Statutory Interpretation
7	<i>State v. H.C.</i>	87.2	B	--	Parental Rights / Due

					Process
8	State v. Grady	84.4	C	--	Criminal Procedure / Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	90.8	B	--	Civil Procedure / Employment
11	WMC v. DNR	100.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	82.2	C	--	Criminal Procedure
14	SEIU v. WERC	97.1	A	YES	Public Sector Unions
15	State v. McAdory	66.6	D	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	92.1	B	YES	Abortion Regulation
17	State v. Stetzer	83.4	C	--	Criminal / Sentencing
18	DOC v. Hayes	96.6	A	--	Administrative / Corrections
19	Evers v. Marklein	89.1	B	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	45.5	F	YES	Second Amendment
21	WBLD v. WEC	87.0	B	YES	Redistricting
22	Hubbard v. Neuman	83.5	C	--	Court of Appeals / Certiorari

**Justice Janet Protasiewicz**

Rank: #4 of 7 | 22 cases scored

**83.3**  
**C**

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	76.1	C	--	--
2	Separation of Powers	79.8	C	--	--
3	Textualism & Originalism	75.8	C	--	--
4	Judicial Restraint	70.2	D	--	--
5	Individual Liberty	77.0	C	--	--

Justice Janet Protasiewicz earned a 83.3 aggregate, placing fourth among the seven justices. Her 2025 Term profile shows a justice capable of excellent methodology---her best performances rival anyone on the court---but inconsistent in high-profile cases where the methodology detected significant departures from structural reasoning.

Her strongest performance came in WMC v. DNR (100.0), where she authored a majority opinion that earned perfect scores across every applicable category. Her opinion in that case demonstrated rigorous textualist methodology, faithful application of precedent, and appropriate judicial restraint. She also scored well in DOC v. Hayes (96.6), Kaul v. Legislature (100.0), and State v. Grady (94.9---her highest score as a dissent author).

Recurring pattern: Justice Protasiewicz's weakest performances cluster in high-profile cases. In Evers v. Marklein (50.9), Van Oudenhoven v. DOJ (52.95), and Kaul v. Urmanski (67.1), the methodology detected significant departures from textualism and judicial restraint. The Evers score reflects the majority opinion's failure to adequately address constitutional objections; the Van Oudenhoven score reflects methodological deficiencies in the per curiam opinion she joined; the Urmanski score reflects concerns about the implied-repeal doctrine's application.

Her Category 4 (Judicial Restraint) average of 70.2 is the second-lowest on the court, suggesting a recurring tendency to reach issues or adopt holdings broader than strictly necessary. Her Category 3 (Textualism) average of 75.8 similarly reflects intermittent departures from text-first reasoning in the highest-stakes cases.

**Case-by-Case Scores**

#	Case	Score	Grade	HP?	Subject
1	Wis. Voter All. v. Secord	85.4	B	--	Public Records / Court Administration
2	Morway v. Morway	83.5	C	--	Domestic Relations / Civil Procedure
3	WEC v. LeMahieu	93.3	A	YES	Election Administration
4	Brown v. WEC	85.4	B	YES	Election Administration
5	Halter v. WIAA	92.5	B	--	Certiorari / Athletic Association
6	Oconomowoc v. Cota	84.0	C	--	Employment / Statutory Interpretation
7	State v. H.C.	87.2	B	--	Parental Rights / Due

					Process
8	State v. Grady	94.9	A	--	Criminal Procedure / Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	90.8	B	--	Civil Procedure / Employment
11	WMC v. DNR	100.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	74.6	D	--	Criminal Procedure
14	SEIU v. WERC	85.2	B	YES	Public Sector Unions
15	State v. McAdory	66.6	D	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	67.1	D	YES	Abortion Regulation
17	State v. Stetzer	83.4	C	--	Criminal / Sentencing
18	DOC v. Hayes	96.6	A	--	Administrative / Corrections
19	Evers v. Marklein	50.9	F	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	53.0	F	YES	Second Amendment
21	WBLD v. WEC	79.5	C	YES	Redistricting
22	Hubbard v. Neuman	83.5	C	--	Court of Appeals / Certiorari

**Justice Rebecca Dallet**

Rank: #5 of 7 | 22 cases scored

**82.1**  
**C**

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	84.4	C	--	--
2	Separation of Powers	77.5	C	--	--
3	Textualism & Originalism	75.6	C	--	--
4	Judicial Restraint	73.5	D	--	--
5	Individual Liberty	76.3	C	--	--

Justice Rebecca Dallet earned an 82.1 aggregate, placing fifth among seven justices. Like her colleagues in the majority bloc, Dallet demonstrates strong baseline methodology in standard cases but experienced significant score degradation in several high-profile decisions.

Her standout performance was the unanimous *Kaul v. Legislature* (100.0), and she earned consistently strong marks in several other cases: *WMC v. DNR* (100.0), *Oconomowoc v. Cota* (96.5, as majority author), and *DOC v. Hayes* (96.6). The *Oconomowoc* opinion was particularly notable---as majority author, Dallet produced a rigorous statutory interpretation opinion that earned one of the highest author scores of the term.

Recurring pattern: Dallet's weakest performances mirror the broader majority-bloc pattern: *Van Oudenhoven v. DOJ* (35.75), *Evers v. Marklein* (50.9), *State v. McAdory* (66.6), and *Kaul v. Urmanski* (67.1). The *Van Oudenhoven* score is the lowest individual score in the entire dataset, reflecting severe methodological deficiencies identified in the per curiam opinion and the Dallet concurrence she authored (52.95, scored separately).

Her Category 2 (Separation of Powers) average of 77.5 and Category 3 (Textualism) average of 75.6 are below the court median, suggesting room for improvement in maintaining textualist discipline and respecting structural boundaries in politically salient cases. However, her Category 1 (Adherence to Precedent) average of 84.4 is respectable and suggests strong stare decisis fidelity in most contexts.

**Case-by-Case Scores**

#	Case	Score	Grade	HP?	Subject
1	<i>Wis. Voter All. v. Secord</i>	85.4	B	--	Public Records / Court Administration
2	<i>Morway v. Morway</i>	88.7	B	--	Domestic Relations / Civil Procedure
3	<i>WEC v. LeMahieu</i>	91.6	B	YES	Election Administration
4	<i>Brown v. WEC</i>	85.4	B	YES	Election Administration
5	<i>Halter v. WIAA</i>	85.5	B	--	Certiorari / Athletic Association
6	<i>Oconomowoc v. Cota</i>	96.5	A	--	Employment / Statutory Interpretation
7	<i>State v. H.C.</i>	77.2	C	--	Parental Rights / Due Process

8	State v. Grady	89.2	B	--	Criminal Procedure / Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	90.8	B	--	Civil Procedure / Employment
11	WMC v. DNR	100.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	84.8	C	--	Criminal Procedure
14	SEIU v. WERC	77.9	C	YES	Public Sector Unions
15	State v. McAdory	66.6	D	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	67.1	D	YES	Abortion Regulation
17	State v. Stetzer	89.2	B	--	Criminal / Sentencing
18	DOC v. Hayes	96.6	A	--	Administrative / Corrections
19	Evers v. Marklein	50.9	F	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	35.8	F	YES	Second Amendment
21	WBLD v. WEC	79.5	C	YES	Redistricting
22	Hubbard v. Neuman	83.5	C	--	Court of Appeals / Certiorari

**Chief Justice Ann Walsh Bradley**

Rank: #6 of 7 | 22 cases scored

**82.0**  
**C**

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	80.0	C	--	--
2	Separation of Powers	81.6	C	--	--
3	Textualism & Originalism	70.2	D	--	YES
4	Judicial Restraint	71.6	D	--	--
5	Individual Liberty	76.4	C	--	--

Chief Justice Ann Walsh Bradley posted an 82.0 aggregate, placing sixth among seven justices. As the court's most senior member, Bradley brings institutional knowledge but produced a methodological profile largely indistinguishable from the majority-bloc average in aggregate terms.

Her best performances came in the term's consensus cases: *Kaul v. Legislature* (100.0), *WMC v. DNR* (100.0), *WEC v. LeMahieu* (96.1), *DOC v. Hayes* (96.6), and *Legislature v. DPI* (92.16). In *WEC v. LeMahieu*, she authored a concurrence that earned the second-highest score in the case (96.1), demonstrating her capacity for rigorous separate writing.

Recurring pattern: Bradley's Category 3 (Textualism & Originalism) average of 70.2 is the lowest on the court in that category, suggesting a recurring difficulty with text-first interpretive methodology. Her *State v. H.C.* concurrence (82.0) and *Van Oudenhoven per curiam joinder* (35.75) both reflect departures from the textualist framework the methodology rewards.

Like her majority-bloc colleagues, Bradley's aggregate is weighed down by the high-profile cases: *Van Oudenhoven* (35.75), *Evers v. Marklein* (50.9), and *Kaul v. Urmanski* (67.1). In standard cases, her average is considerably higher. Her *Morway v. Morway* majority opinion (86.5) and *McDaniel v. DOC joinder* (90.83) reflect solid if unspectacular methodology in lower-stakes contexts.

**Case-by-Case Scores**

#	Case	Score	Grade	HP?	Subject
1	<i>Wis. Voter All. v. Secord</i>	85.4	B	--	Public Records / Court Administration
2	<i>Morway v. Morway</i>	86.5	B	--	Domestic Relations / Civil Procedure
3	<i>WEC v. LeMahieu</i>	96.1	A	YES	Election Administration
4	<i>Brown v. WEC</i>	85.4	B	YES	Election Administration
5	<i>Halter v. WIAA</i>	85.5	B	--	Certiorari / Athletic Association
6	<i>Oconomowoc v. Cota</i>	89.5	B	--	Employment / Statutory Interpretation
7	<i>State v. H.C.</i>	82.0	C	--	Parental Rights / Due Process
8	<i>State v. Grady</i>	87.2	B	--	Criminal Procedure /

					Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	90.8	B	--	Civil Procedure / Employment
11	WMC v. DNR	100.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	78.9	C	--	Criminal Procedure
14	SEIU v. WERC	85.2	B	YES	Public Sector Unions
15	State v. McAdory	66.6	D	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	67.1	D	YES	Abortion Regulation
17	State v. Stetzer	83.4	C	--	Criminal / Sentencing
18	DOC v. Hayes	96.6	A	--	Administrative / Corrections
19	Evers v. Marklein	50.9	F	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	35.8	F	YES	Second Amendment
21	WBLD v. WEC	79.5	C	YES	Redistricting
22	Hubbard v. Neuman	83.5	C	--	Court of Appeals / Certiorari

## Chief Justice Jill Karofsky

Rank: #7 of 7 | 22 cases scored

80.1  
C

Cat	Category	Score	Grade	Leader?	Lowest?
1	Adherence to Precedent	74.8	D	--	YES
2	Separation of Powers	76.4	C	--	YES
3	Textualism & Originalism	73.2	D	--	--
4	Judicial Restraint	68.0	D	--	YES
5	Individual Liberty	64.5	F	--	YES

Chief Justice Jill Karofsky recorded the lowest aggregate score of the term (80.1), though she remains within the C-grade range that characterizes the entire majority bloc. Her profile shows the widest variance of any justice except Hagedorn, with scores ranging from a perfect 100.0 (Kaul v. Legislature) to 35.75 (Van Oudenhoven v. DOJ).

Karofsky's strongest performances occurred in the term's consensus opinions: Kaul v. Legislature (100.0), WMC v. DNR (100.0), DOC v. Hayes (96.6), and Legislature v. DPI (92.16). These cases demonstrate that she is fully capable of joining---and, in the case of authored opinions, producing---methodologically rigorous work.

Recurring pattern: Karofsky scored lowest among all justices in four of five categories: Adherence to Precedent (74.8), Separation of Powers (76.4), Judicial Restraint (68.0), and Individual Liberty (64.5). The Category 4 average of 68.0 is particularly concerning---it suggests a systematic tendency to reach issues or adopt holdings broader than the case requires. Her Kaul v. Urmanski concurrence (44.1) was the lowest individual score for any authored opinion in the dataset.

The Urmanski concurrence illustrates the challenge: as author, Karofsky wrote a separate opinion that the methodology scored as lacking in textual grounding, precedential fidelity, and restraint. When combined with low scores in Van Oudenhoven (35.75), Evers v. Marklein (50.2), and State v. Stetzer (71.1), the pattern points to recurring methodological difficulties in cases where the political stakes or policy implications are significant.

### Case-by-Case Scores

#	Case	Score	Grade	HP?	Subject
1	Wis. Voter All. v. Secord	85.4	B	--	Public Records / Court Administration
2	Morway v. Morway	83.5	C	--	Domestic Relations / Civil Procedure
3	WEC v. LeMahieu	91.6	B	YES	Election Administration
4	Brown v. WEC	85.4	B	YES	Election Administration
5	Halter v. WIAA	87.4	B	--	Certiorari / Athletic Association
6	Oconomowoc v. Cota	89.5	B	--	Employment / Statutory Interpretation
7	State v. H.C.	87.2	B	--	Parental Rights / Due

					Process
8	State v. Grady	84.4	C	--	Criminal Procedure / Due Process
9	Kaul v. Legislature	100.0	A	YES	Separation of Powers
10	McDaniel v. DOC	90.8	B	--	Civil Procedure / Employment
11	WMC v. DNR	100.0	A	YES	Admin. Agency Power
12	Legislature v. DPI	92.2	B	YES	Separation of Powers
13	State v. Ramirez	83.7	C	--	Criminal Procedure
14	SEIU v. WERC	85.2	B	YES	Public Sector Unions
15	State v. McAdory	66.6	D	--	Criminal / Fourth Amendment
16	Kaul v. Urmanski	44.1	F	YES	Abortion Regulation
17	State v. Stetzer	71.1	D	--	Criminal / Sentencing
18	DOC v. Hayes	96.6	A	--	Administrative / Corrections
19	Evers v. Marklein	50.2	F	YES	Separation of Powers
20	Van Oudenhoven v. DOJ	35.8	F	YES	Second Amendment
21	WBLD v. WEC	79.5	C	YES	Redistricting
22	Hubbard v. Neuman	83.5	C	--	Court of Appeals / Certiorari

## APPENDIX: CASE INDEX

The following table lists all 22 cases scored during the 2025 Term, with high-profile designations marked.

#	Case Name	Citation	Date	HP?	Subject Matter
1	Wis. Voter All. v. Secord	2025 WI 2	Jan. 17, 2025	No	Public Records / Court Administration
2	Morway v. Morway	2025 WI 3	Jan. 24, 2025	No	Domestic Relations / Civil Procedure
3	WEC v. LeMahieu	2025 WI 4	Feb. 7, 2025	YES	Election Administration (x1.4)
4	Brown v. WEC	2025 WI 5	Feb. 14, 2025	YES	Election Administration (x1.4)
5	Halter v. WIAA	2025 WI 10	Apr. 8, 2025	No	Certiorari / Athletic Association
6	Oconomowoc v. Cota	2025 WI 11	Apr. 10, 2025	No	Employment / Statutory Interpretation
7	State v. H.C.	2025 WI 20	June 3, 2025	No	Parental Rights / Due Process
8	State v. Grady	2025 WI 22	June 13, 2025	No	Criminal Procedure / Due Process
9	Kaul v. Legislature	2025 WI 23	June 17, 2025	YES	Separation of Powers (x1.4)
10	McDaniel v. DOC	2025 WI 24	June 17, 2025	No	Civil Procedure / Employment
11	WMC v. DNR	2025 WI 26	June 24, 2025	YES	Admin. Agency Power (x1.3)
12	Legislature v. DPI	2025 WI 27	June 24, 2025	YES	Separation of Powers (x1.4)
13	State v. Ramirez	2025 WI 28	June 27, 2025	No	Criminal Procedure
14	SEIU v. WERC	2025 WI 29	June 27, 2025	YES	Public Sector Unions (x1.3)
15	State v. McAdory	2025 WI 30	June 27, 2025	No	Criminal / Fourth Amendment
16	Kaul v. Urmanski	2025 WI 32	July 2, 2025	YES	Abortion Regulation (x1.5)
17	State v. Stetzer	2025 WI 34	July 9, 2025	No	Criminal / Sentencing
18	DOC v. Hayes	2025 WI 35	July 10, 2025	No	Administrative / Corrections
19	Evers v. Marklein	2025 WI 36	July 11, 2025	YES	Separation of Powers (x1.4)
20	Van Oudenhoven v. DOJ	2025 WI (unnumbered)	2025	YES	Second Amendment (x1.3)
21	WBLD v. WEC	2025 WI 52	Nov. 25, 2025	YES	Redistricting (x1.5)
22	Hubbard v. Neuman	2023AP255	2025	No	Court of Appeals / Certiorari

## CONCLUSION

The 2025 Term Judicial Scorecard reveals a court operating at two methodological tiers. The top tier---Justice R.G. Bradley (89.9), Chief Justice Ziegler (89.0), and Justice Hagedorn (88.3)---maintained consistent structural discipline across the full spectrum of cases, from routine procedural disputes to the most politically charged constitutional controversies. The second tier---Justice Protasiewicz (83.3), Justice Dallet (82.1), Chief Justice A.W. Bradley (82.0), and Chief Justice Karofsky (80.1)---demonstrated strong baseline methodology in standard cases but experienced significant methodological degradation in high-profile decisions.

This is not a story of incompetence versus competence. Every justice on the Wisconsin Supreme Court scored at or above 80 in the majority of cases, and the unanimous opinions of the term show that the full court is capable of producing exemplary jurisprudence. The story, rather, is about consistency under pressure. The high-profile case multiplier system was designed to capture precisely this phenomenon, and the 2025 data confirms its utility: the gap between the tiers is driven almost entirely by performance in the cases that carry the greatest constitutional significance.

Three findings merit particular attention as the Court Watch project continues into future terms. First, Justice Hagedorn's role as a methodological swing justice---capable of earning perfect scores when authoring consensus opinions but also producing the widest range of any justice---bears close monitoring. Second, Chief Justice Karofsky's consistently low Category 4 (Judicial Restraint) scores suggest a structural tendency toward broader holdings that may warrant focused analysis. Third, the court's unanimous or near-unanimous opinions consistently produced the highest scores across the board, suggesting that bipartisan jurisprudential consensus correlates strongly with methodological rigor.

IRG Court Watch will continue to evaluate every published decision of the Wisconsin Supreme Court using the Version 6.0 methodology. Individual case scorecards are available as companion documents. A detailed methodology manual explaining the scoring system in full is forthcoming. Longer individual justice profiles expanding on the analysis in this report are also in development for the IRG Court Watch website.

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