

FILED

**STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546**

December 8, 2021

**OFFICE OF
APPELLATE COURTS**

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of May Yang
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, May Yang, declare as follows:

1. My name is May Yang, and I am Public Policy Manager at the Minnesota Council on Foundations (“MCF”) and serve as the campaign manager of the Our Maps MN Campaign.
2. I have personal knowledge of the Corrie Plaintiffs’ Proposed Redistricting Plan (a/k/a the “Unity Map”) and the process by which the Unity Map was developed.
3. The Unity Map was developed in conjunction with the Our Maps MN Campaign, which is a nonpartisan, grassroots campaign, committed to a community-focused, accessible, and transparent redistricting process. The Unity Map is also a natural extension of groundbreaking work done by the Minnesota Census Mobilization Partnership in connection with the 2020 Census. The Minnesota Council on Foundations played a leadership role in convening the Partnership and coordinating the community engagement and cohort mapping efforts of the Campaign.
4. In connection with the 2020 Census, the Minnesota Census Mobilization Partnership established a strong infrastructure for civic engagement and partnership between individuals, communities, nonprofit and community organizations, and grantmakers, in order to

ensure Minnesota had a fully-inclusive, nonpartisan, and accurate Census count. The Partnership was particularly focused on securing and organizing resources to ensure full participation in the 2020 Census by historically undercounted communities of Black, Indigenous, and People of Color (BIPOC) communities throughout Minnesota. The Partnership's efforts reached over 1.3 million Minnesotans, helped Minnesota achieve the #1 self-response rate for the 2020 Census, and contributed directly to Minnesota retaining its 8th Congressional seat.

5. Following the Partnership's unprecedented effort to ensure historically undercounted communities were counted during the 2020 Census in Minnesota, the Our Maps MN Campaign turned its attention to ensuring the fair representation of these same communities in the redistricting process.

6. In 2021, the Our Maps MN Campaign worked diligently to engage Minnesota's BIPOC and other historically underrepresented communities in the redistricting process, with a shared goal of ensuring the new redistricting plans that will govern Minnesota's elections for the next decade reflect the input of these communities.

7. As part of the Our Maps MN Campaign, MCF partnered with 12 BIPOC-led and serving organizations, including:

- African Career, Education & Resource, Inc.
- Anika Foundation
- Asian American Organizing Project
- CAPI USA
- Communities Organizing Latinx Power and Action
- Deaf Equity
- Hispanic Advocacy and Community Empowerment through Research
- Islamic Civic Society of America
- Native American Community Development Institute
- Pillsbury United Communities
- The Council on American-Islamic Relations
- Voices for Racial Justice

(collectively, the “Unity Cohort”). Many of these organizations worked with underrepresented communities during the 2020 Census—efforts that were either similar to or done in conjunction with the Minnesota Census Mobilization Partnership. Several have testified before the Minnesota Legislature and the Special Redistricting Panel during this redistricting cycle.

8. During this redistricting cycle, the Unity Cohort met regularly throughout the 2021 calendar year to discuss redistricting issues, mapping initiatives, community outreach and messaging, and coordinate testimony before the Minnesota Legislature and this Panel by BIPOC community members. The Unity Cohort led over 100 hours of training, redistricting education and awareness, community outreach and engagement, listening sessions, and map drawing meetings. These sessions were conducted in more than 5 languages, engaged more than ten racial/ethnic groups, and drew participation from more than 400 individual community members. Through this engagement, more than 40 “community of interest” maps were developed during the months of July, August and September 2021, all of which were informed and developed by community members and their stories.

9. With these community of interest maps in hand, the Unity Cohort began working on the Unity Map, which ultimately become the Corrie Plaintiffs’ Proposed Redistricting Plan. From September through early December 2021, the Unity Cohort met regularly for two-hour sessions, accompanied by redistricting and geographic information systems (GIS) experts to guide the process. Time was dedicated in the sessions to discussing the community of interest maps, population growth and demographic shifts reflected by 2020 Census data, and the impact these changes are having and are expected to have on communities of interest. Ample time in these sessions was dedicated to participants sharing information about their communities, their shared interests, and the elements that shape and bind them together. These discussions gave participants

a forum to learn from each other and develop a redistricting plan that best serves all of Minnesota's communities of interest. After developing drafts of the Unity Map, the Unity Cohort members took the drafts back to their communities to elicit feedback about how they were represented. This information was then reported back to the Cohort, and additional changes were made to best reflect community interests. This process continued until the Unity Cohort reached consensus on the district boundaries reflected in the Unity Map.

10. The Our Maps MN Campaign and the process by which the Unity Map was developed leaves no doubt that Minnesota's BIPOC and historically underrepresented communities desire to be engaged in the redistricting process and, in fact, can *lead* the process.

11. The Unity Map was created by the people for the people—by engaged members of Minnesota's BIPOC and other historically underrepresented communities who historically have been left out of the redistricting process, and with their interests at the center. To do right by these communities and to preserve them in the redistricting process, and to make elected officials as responsive as possible to these communities, we ask that the Panel adopt the Unity Map, which is the foundation of the Corrie Plaintiffs' proposed redistricting plan.

I declare under penalty of perjury that everything that I have stated in this declaration is true and correct.

Dated: December 6, 2021



May Yang

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**STATE OF MINNESOTA
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A21-0243
A21-0546**

December 8, 2021

**OFFICE OF
APPELLATE COURTS**

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of
Annastacia Belladonna-Carrera
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Anastacia Belladonna-Carrera, declare as follows:

1. I am the Executive Director of Common Cause Minnesota (“Common Cause”). Common Cause believes that we’re better off when people from all walks of life participate in self-governance. I have worked in the area of human and civil rights since 1994. As a Latina professional, I have had the honor of working with many local leaders from our community of color and Indigenous Minnesotans throughout the years. Our communities in Minnesota are rich in cultural identity and local strength. When I arrived in 1988 to attend law school, the Latino population in MN was about 38,000 in the entire state. Now, Minnesota is home to close to 250,260 Latinos.
2. Common Cause is the convenor of the Minnesota Alliance for Democracy. The Alliance for Democracy is a nonpartisan conveying table established by Common Cause to create space for diverse grassroots groups, coalitions, and community activists in Minnesota to coordinate and collaborate with allies and other stakeholders. Common Cause, in partnership with the Alliance for Democracy, has been working with Indigenous and other communities of color in Greater Minnesota and outlining suburbs as part of the collective efforts of the Our Maps MN Campaign.
3. In my capacity as executive director of Common Cause Minnesota and a co-lead for the Our Maps MN Campaign, I have personal knowledge of the Corrie Plaintiffs’ Proposed Redistricting Plan and the various Indigenous stakeholders, as well as groups and organizations of color, who actively led the work of advocacy and community mapping within cities in Minnesota with the largest populations of color. It is the collective efforts of everyone involved in owning the process of drawing their communities of interests and ultimately shaping district maps that has resulted in the Corrie Plaintiff’s Proposed Redistricting Plan.

4. The Our Maps MN Campaign was created in 2018 by grassroots community stakeholders and is a nonpartisan, grassroots campaign, committed to a community-focused, accessible, and transparent redistricting process. It consists of various components of civic engagement supporting Minnesotans to be in relationship with their elected officials and work together to ensure an accessible and transparent redistricting process accountable to constituents. The most recent phase of the Our Maps MN Campaign focused on ensuring disenfranchised communities and communities of color were actively participating in the redistricting, community mapping, and legislative public processes.
5. As part of the Our Maps MN Campaign, Common Cause partnered with trusted local community leaders, organizations, or groups, from Indigenous and communities of color with longstanding local networks in in greater Minnesota. Many of those we interacted with from the Latino and East African communities were not affiliated with any formalized group, they were local church goers or community members gathered by a local trusted community member to provide direct mapping input or host mapping sessions. We met with groups in Faribault, Northfield, Rochester, Worthington, Madelia, St. James, Chaska, Shakopee, and Mankato, just to name a few. Some of the organizations we partnered with include: UNIDOS, an immigrant-led, multigenerational, Latinx based community non-profit; and Minnesota Immigrant Movement, which for 15 years has been a network of local resources and advocacy, connecting Latinos and other immigrant Minnesotans to resources.
6. Through the collaborative efforts and partnerships with local leaders we hosted workshops getting local community leaders ready to engage others in their community about the importance of redistricting to their voting power and how mapping works. They learned about how to engage the public process led by the legislature and the Special Redistricting Panel. They held nine formal mapping discussions and six mapping sessions consisting of approximately eighteen hours of mapping sessions. Eight community leaders testified during public hearings in Worthington, Rochester, St. Cloud and Shakopee. Of the eight who testified in greater Minnesota, all testified for the very first time and two did it in Spanish. These were Latino and African immigrant Minnesotans who live, work, and thrive in central and southern greater Minnesota and who were eager to participate in making sure they were heard, seen, and fairly represented. Community members described who they were as communities of interest, shared their concerns, made recommendations on prioritizing redistricting principles and some even submitted their community maps to the legislature and Special Redistricting Panel.
7. The Corrie Plaintiffs' Proposed Redistricting Plans fully capture the collective efforts and contributions from Minnesotans of Color, Indigenous Minnesotans, and community allies across the state, in cities with the largest populations color, who came together as part of the Our Maps MN grassroots nonpartisan campaign efforts.
8. The Our Maps MN Campaign collective effort and the process by which the Corrie Plaintiff's proposed Redistricting Plans were developed leaves no doubt

that Minnesotans of Color and historically underrepresented communities can be fairly captured and represented in Minnesota's district maps.

I fully support the collective work that is reflected in the Corrie Plaintiffs' proposed Redistricting Plans, which best captures and fairly represents all Minnesotans, including disenfranchised communities and Minnesotans of Color.

I declare under penalty of perjury that everything that I have stated in this declaration is true and correct.

Dated: December 6, 2021

ABelladonna-Carrera
Annastacia Belladonna-Carrera

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Greenwood, Mary E. Kupper, Douglas W.
Backstrom and James E. Hougas III,
individually and on behalf of all citizens and
voting residents of Minnesota similarly
situated, and League of Women Voters
Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven,
Karen Lane, Joel Hineman, Carol Wegner,
and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Lenny Fineday
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota;
and Kendra Olson, Carver County Elections
and Licensing Manager, individually and on
behalf of all Minnesota county chief election
officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael
Arulfo, Tanwi Prigge, Jennifer Guertin,
Garrison O'Keith McMurtrey, Mara Lee
Glubka, Jeffrey Strand, Danielle Main, and
Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Lenny Fineday, declare as follows:

1. I am a member of the Leech Lake Band of Ojibwe and reside in Cass Lake, Minnesota within the Leech Lake Reservation. I also serve as the Chief Legal Counsel for White Earth Band of Ojibwe and as Vice Chair of the Cass Lake-Bena Public School Board.
2. I support the proposed boundaries for House District 2A to bring together the Ojibwe people of Leech Lake, White Earth, and Red Lake. The Ojibwe seek unified representation because they constitute a distinct community within Minnesota with specific cultural ties and common issues.
3. The Ojibwe have lived as a distinct community in northern Minnesota for well over 1,000 years. In addition to their cultural contributions to the state, today the Ojibwe provide a significant economic impact, operating eight casino-resorts throughout their territories, which collectively make them the largest employer in the area and provide an economic impact to the area in the hundreds of millions of dollars.
4. Despite this economic benefit, the Ojibwe—like many other tribal communities—still need assistance after decades of destructive federal policy that lead to intergenerational poverty and underinvestment.
5. One specific need shared among the Ojibwe is that for affordable housing. Even before the pandemic, many Ojibwe faced homelessness or near-homelessness on their reservations, with waits of 14 months on average for subsidized housing, compared to an average of nine months for other Minnesotans. Housing insecurity among the Ojibwe is both caused by and contributes to other significant social ills, including unemployment,

underemployment, and physical and mental health problems. According to a 2018 survey of homeless Ojibwe, only 24 percent of them were employed and 81 percent earned wages of less than \$15/hour. StratisHealth reports that the percentage of Ojibwe aged 45-64 with one or more disabilities is twice that of other Minnesotans; Ojibwe are six times more likely to lack a high school diploma or GED than other Minnesotans. The housing and health problems of the Ojibwe cannot be addressed without a dedicated advocate in the legislature.

6. The Ojibwe have formed a distinct community within Minnesota for hundreds of generations and must be kept intact to ensure that representatives of this community can better serve our needs and interests, and to ensure that our voting power is not diluted. The proposed boundaries presented by the Corrie plaintiffs keep our community intact and ensure proper and effective representation for the Ojibwe people.

I declare under penalty of perjury of the laws of the United States and the state of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 3, 2021


Leonard Fineday (Dec 3, 2021 20:22 CST)

Lenny Fineday

Lenny Fineday Ojibwe COI narrative

Final Audit Report

2021-12-04

Created:	2021-12-03
By:	Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAhCr4_cK0KRNhEr8e24PIpVEH-DXhLm

"Lenny Fineday Ojibwe COI narrative" History

 Document created by Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
2021-12-03 - 11:16:59 PM GMT- IP address: 174.199.89.172

 Document emailed to Leonard Fineday (lennyfineday@gmail.com) for signature
2021-12-03 - 11:17:44 PM GMT

 Email viewed by Leonard Fineday (lennyfineday@gmail.com)
2021-12-04 - 2:20:13 AM GMT- IP address: 104.28.104.132

 Document e-signed by Leonard Fineday (lennyfineday@gmail.com)
Signature Date: 2021-12-04 - 2:22:25 AM GMT - Time Source: server- IP address: 107.115.203.40

 Agreement completed.
2021-12-04 - 2:22:25 AM GMT

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**Declaration of Dr. Bruce Corrie
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

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Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Dr. Bruce Corrie, declare as follows:

1. I am an immigrant Professor of Economics at Concordia University in Saint Paul, Minnesota. For over 25 years, I have conducted research on the economic contributions of the ethnic marginalized communities of Minnesota.
2. The ALANA (African Latino Asian and Native American) ethnic economy in Minnesota is an estimated \$1.4 trillion annually, including income, housing, business, as well as lifetime earning based on current educational levels. This is larger than the entire economy of Mexico on a relative scale. (<https://empoweringstrategies.org/the-minnesota-solution-to-close-the-287-billion-racial-economic-gaps/>)
3. The lack of adequate political representation for Minnesota's ethnic communities is a substantial cause of the huge and prevalent economic disparities in Minnesota along racial lines, which I estimate to an economic loss around \$287 billion. (<https://empoweringstrategies.org/the-minnesota-solution-to-close-the-287-billion-racial-economic-gaps/>). In drawing the proposed congressional and legislative districts that are supported by our coalition, we focused on keeping ethnic communities of interest together such that, as the economic bases of these communities continue to grow and achieve critical economic mass, they will necessitate greater civic engagement, political participation, and political representation.
4. More specifically, under our proposed redistricting plan, we would create 92 House Districts (69 percent of all House Districts) and 66 Senate districts (98 percent of all Senate Districts) that have an ALANA economy within the district of \$100 million or more—effectively increasing the current representation of ALANA interests from 125 to 158 legislative districts. See Exhibits A and B. An ethnic economy of this size provides critical

7. Proposed Senate District 61 has an ethnic economy of \$916 million and includes the bustling Lake Street, with two very large cultural malls – [Karmel Mall](#) serving the East African community and Plaza Mexico serving the Latino community.



8. These ethnic economies also contribute to the tax base in these legislative districts. For example, a recent estimate shared by the owner of the East African mall – Karmel Mall – shows that it has one of the largest taxable value per acre – close to \$3 million – which is larger than many nearby stores like Target. Using estimates from the Minnesota Tax Incidence Study, these ethnic economies in Minnesota pay an estimated \$2.7 billion in state and local taxes in Minnesota.
9. The significance of these ethnic economies is illustrated in virtual tours of cultural mall and cultural destinations in Minnesota, which can be found at www.culturaldestinations.org.

I declare under penalty of perjury of the laws of the United States and the state of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 7, 2021

Dr. Bruce Corrie

EXHIBIT A – Proposed Senate District Ethnic Economies

Ethnic economy is estimated by taking the ALANA (African Latino Asian and Native American) population in each legislative district and multiplying it by projected per capita income for 2021. This is an underestimate of the ethnic economy as it does not include other assets such as housing, business, and lifetime earnings/skills.

Proposed Senate District	Ethnic Economy
1	\$ 173,969,550
2	\$ 477,139,471
3	\$ 131,745,188
4	\$ 156,804,732
5	\$ 237,322,669
6	\$ 97,160,940
7	\$ 232,466,569
8	\$ 112,422,201
9	\$ 165,151,647
10	\$ 151,727,496
11	\$ 120,433,026
12	\$ 126,811,459
13	\$ 140,703,757
14	\$ 492,015,125
15	\$ 113,765,785
16	\$ 141,640,575
17	\$ 191,905,423
18	\$ 284,136,651
19	\$ 103,948,498
20	\$ 177,109,116
21	\$ 192,853,746
22	\$ 382,943,261
23	\$ 297,265,504
24	\$ 194,038,642
25	\$ 359,468,388
26	\$ 267,617,887
27	\$ 288,856,602
28	\$ 485,969,838
29	\$ 118,266,334
30	\$ 191,035,166
31	\$ 255,319,216
32	\$ 237,936,042
33	\$ 421,295,934

34	\$ 444,633,775
35	\$ 483,823,918
36	\$ 251,937,884
37	\$ 481,863,585
38	\$ 432,532,259
39	\$ 450,379,703
40	\$ 477,468,375
41	\$ 738,511,504
42	\$ 155,310,103
43	\$ 140,386,398
44	\$ 199,694,891
45	\$ 333,775,468
46	\$ 579,977,246
47	\$ 483,571,056
48	\$ 486,632,972
49	\$ 216,936,430
50	\$ 515,910,531
51	\$ 433,330,475
52	\$ 395,999,307
53	\$ 507,333,509
54	\$ 482,229,795
55	\$ 511,793,199
56	\$ 1,234,737,874
57	\$ 603,478,698
58	\$ 1,087,443,775
59	\$ 311,871,104
60	\$ 703,375,007
61	\$ 916,481,278
62	\$ 391,504,781
63	\$ 660,867,817
64	\$ 1,197,896,137
65	\$ 357,958,801
66	\$ 1,390,942,144
67	\$ 693,480,022
Total	\$ 26,275,316,259

EXHIBIT B – Proposed House District Ethnic Economies

Ethnic economy estimated by taking the ALANA (African Latino Asian and Native American) population in each legislative district and multiplying it by projected per capita income for 2021. This is an underestimate of the ethnic economy as it does not include other assets such as housing, business, and lifetime earnings/skills.

Proposed House District	Ethnic Economy
01A	\$ 75,662,818
01B	\$ 99,198,458
02A	\$ 101,239,969
02B	\$ 376,328,877
03A	\$ 66,545,454
03B	\$ 65,772,692
04A	\$ 52,142,162
04B	\$ 104,994,391
05A	\$ 100,396,614
05B	\$ 139,035,832
06A	\$ 59,518,680
06B	\$ 37,893,702
07A	\$ 160,738,816
07B	\$ 74,016,837
08A	\$ 52,586,086
08B	\$ 60,218,774
09A	\$ 89,314,380
09B	\$ 76,994,175
10A	\$ 77,291,066
10B	\$ 75,163,276
11A	\$ 78,449,536
11B	\$ 42,300,197
12A	\$ 67,315,492
12B	\$ 59,777,637
13A	\$ 70,100,054
13B	\$ 71,557,946
14A	\$ 336,570,724
14B	\$ 166,185,646
15A	\$ 59,607,108

15B	\$	54,528,283
16A	\$	64,012,581
16B	\$	77,972,181
17A	\$	87,967,966
17B	\$	104,717,202
18A	\$	96,020,182
18B	\$	190,075,106
19A	\$	56,436,860
19B	\$	48,107,267
20A	\$	84,514,321
20B	\$	93,157,448
21A	\$	115,719,108
21B	\$	77,996,136
22A	\$	259,161,351
22B	\$	124,786,991
23A	\$	189,446,928
23B	\$	111,674,707
24A	\$	67,326,155
24B	\$	127,240,103
25A	\$	201,705,020
25B	\$	161,646,292
26A	\$	212,730,305
26B	\$	56,227,919
27A	\$	220,441,777
27B	\$	70,699,100
28A	\$	184,014,795
28B	\$	307,330,818
29A	\$	35,804,043
29B	\$	83,209,060
30A	\$	86,640,265
30B	\$	105,933,781
31A	\$	114,887,959
31B	\$	142,448,976
32A	\$	115,339,800
32B	\$	125,136,768
33A	\$	236,853,857
33B	\$	190,078,912
34A	\$	242,755,809

34B	\$	205,964,242
35A	\$	290,698,559
35B	\$	197,841,614
36A	\$	131,267,262
36B	\$	122,673,227
37A	\$	252,881,884
37B	\$	232,851,572
38A	\$	219,938,791
38B	\$	216,044,269
39A	\$	219,512,325
39B	\$	235,721,720
40A	\$	250,052,703
40B	\$	232,253,526
41A	\$	428,365,419
41B	\$	316,246,645
42A	\$	68,327,189
42B	\$	87,864,335
43A	\$	68,232,916
43B	\$	72,733,310
44A	\$	129,290,523
44B	\$	71,248,691
45A	\$	151,944,549
45B	\$	184,352,896
46A	\$	334,814,964
46B	\$	252,984,464
47A	\$	228,032,769
47B	\$	260,753,304
48A	\$	324,761,891
48B	\$	165,217,458
49A	\$	110,607,310
49B	\$	107,768,385
50A	\$	340,170,662
50B	\$	179,734,774
51A	\$	250,685,057
51B	\$	188,644,989
52A	\$	208,845,109
52B	\$	190,274,552
53A	\$	207,404,212

53B	\$	303,761,383
54A	\$	298,563,052
54B	\$	191,867,462
55A	\$	191,953,484
55B	\$	326,414,305
56A	\$	620,580,029
56B	\$	633,447,431
57A	\$	330,199,297
57B	\$	281,800,949
58A	\$	556,212,549
58B	\$	553,079,200
59A	\$	191,651,650
59B	\$	123,390,646
60A	\$	429,633,974
60B	\$	284,866,998
61A	\$	531,576,571
61B	\$	400,091,529
62A	\$	198,820,348
62B	\$	197,679,610
63A	\$	385,983,621
63B	\$	281,681,374
64A	\$	594,779,243
64B	\$	619,260,707
65A	\$	140,783,448
65B	\$	221,902,600
66A	\$	727,713,713
66B	\$	672,022,031
67A	\$	335,521,756
67B	\$	365,129,859
Statewide	\$	26,549,040,417

FILED

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

December 8, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Rebeca Sedarski
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Rebeca Sedarski declare as follows:

1. I am Rebeca Sedarski, and I've lived in Rochester, Minnesota for thirty years. I have personal knowledge of where the largest communities of color in this area live.
2. Rochester has grown by about 18,599 residents since the 2010 census. There are about 111,396 Minnesotans living in Rochester, and I am one of just over 5,500 Latino residents of Rochester. We also have a vibrant Black community in Rochester—almost 9,430 residents, representing about 8.2% of our community. Another vibrant immigrant group in our community is the Asian American and Pacific Islanders, of which there are approximately 8,410 residents, representing 7.3% of our community. Collectively, communities of color have driven recent growth in the local population and economy.
3. I support the Corrie Plaintiffs' proposed boundaries for House District 28A because it keeps Latino and East African communities that have been living, working, and growing the local economy for the past several decades together.
4. I also support the Corrie Plaintiffs' proposed boundaries for House District 28B, which reflects input from community members from Latino/Hispanic and East African communities to make a House seat that places Latino/Hispanic and East African residents in a single district. Proposed House District 28A has a population of 37 percent Minnesotans of color and Indigenous Minnesotans (17 percent Black/African American, 10 percent Latino/Hispanic). By 2028, the proposed district is projected to surpass 40 percent Minnesotans of color and Indigenous Minnesotans. Many of the cultural resources utilized by our combined communities (workplaces, stores, parks, and schools)

are included in the neighboring proposed House District 28A, which also includes much of Rochester City.

5. Proposed Senate District 28 unifies major portions of Rochester, rather than splitting the city's Latino/Hispanic and East African communities. Together, we ask that Rochester's State Senate seat configuration keep us in a single Senate seat and not dilute us by splitting the city.
6. The proposed Senate District 28 has other diversifying areas representing 21 percent of Minnesotans of color and Indigenous Minnesotans. The eastern precincts that connect House District 28A with the border of Olmsted County allows the proposed Senate District 28 to meet non-embed standards.
7. Our communities share similar interests in affordable housing and healthcare access, as well as inequities in access to daycare, and education. We face same barriers presented by poverty, language, and lack of access to resources.
8. It is important to keep these communities with similar interests and values together in voting districts, so that our Latino and African Rochester residents can have a louder voice in our state's politics. For our communities to receive the services we need, we must have a representative who can speak for our common needs at all levels of government.

I declare under penalty of perjury of the laws of the United States and the State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021

Rebeca Sedarski

Rebeca Sedarski (Dec 6, 2021 17:11 MST)

Rebeca Sedarski

Final Rebeca Sedarski Rochester Declarataion

Final Audit Report

2021-12-07

Created:	2021-12-07
By:	Anastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA9Vrmbu6fs4wo3vLDB4FTd0KGKnDt0DZ1

"Final Rebeca Sedarski Rochester Declarataion" History

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2021-12-07 - 0:03:46 AM GMT
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Signature Date: 2021-12-07 - 0:11:54 AM GMT - Time Source: server- IP address: 187.172.212.188
-  Agreement completed.
2021-12-07 - 0:11:54 AM GMT

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STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

December 8, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

**Declaration of Jovita Francisco
in Support of the
Corrie Plaintiffs' Proposed
Redistricting Plan**

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Jovita Francisco, declare as follows:

1. I am the executive director of Minnesota Immigrant Movement (MIM). MIM has worked with statewide Latino communities for more than 15 years, providing diverse but Latino-focused communities with a network of support, connecting them to resources, and advocating on their behalf when community resources are scarce.
2. We support the Corrie Plaintiffs' proposed boundaries for Congressional District 7, Senate District 22, and House Districts 22A and 22B.
3. The proposed boundary for Congressional District 7 keeps Nobles and Watonwan Counties together. These counties contain the cities of Worthington, St. James, and Madelia, which have some of the largest Latino populations in the region. These Latino communities are bound together by specific cultural ties and unique common issues. Keeping these Latino communities together in Congressional District 7 will provide them with unified congressional representation.
4. St. James is a close-knit community in Watonwan County. It has a population of close to 5,000 Minnesotans, and the Latino community represents over 37 percent of the total population. The local St. James economy is driven by meat and food processing plants in the area, where many Latinos work. St. James Public Schools has adapted to the influx of Latino students, which has turned the white student population in the district into the minority. The Latino community in St. James is a strong and vibrant part of the local community and should be kept together with other Latino communities in Congressional District 7.
5. Worthington also has a close-knit Latino community. Of the 12,764 residents living in Worthington, 4521 (35%) are Latino. Worthington is located in Nobles County, which is

demographically one of the fastest-changing counties in Minnesota. Over the last 10 years, Nobles County experienced the state's largest increase in people of color. For example, in 2010, the Nobles County's population was close to 67% white—due to an influx of residents of color, the white population is now closer to 57%. On a countywide basis, the population of Nobles County today is 21,378 residents; of that number, 4820 (23%) are Latino.

6. The total population of Madelia, Minnesota is 2308. Latino community members make up 27% of that total—a substantial number.
7. In March 2018, the Minnesota Department of Employment and Economic Development (DEED) published a report on the Changing Faces of Southwest Minnesota. *See* <https://mn.gov/deed/newscenter/publications/review/march-2018/changing-faces-southwest.jsp>. In its report, DEED noted that after experiencing a loss of just over 3,400 people since 2010, Southwest Minnesota is now home to about 392,000 residents and, in recent years, welcomed a net influx of nearly 4,000 foreign-born Minnesotans. Over half (8,951 people) of the region's total foreign-born population is from Latin America, including a substantial number of immigrants from Mexico, Guatemala, El Salvador, and Honduras.
8. Many public policy issues unite the Latino communities of Southwest Minnesota, including affordable housing, education, economic development, workplace safety issues and transportation. As the demographics of Southwest Minnesota have become more diverse, the political representation has not kept pace. In fact, our Latino and other persons of color communities have not had adequate political representation of shared concerns or issues that we face in Southwestern Minnesota.
9. Under current voting district lines, the influence of Latino and other persons of color communities in Southwestern Minnesota have been diluted. We have been unsuccessful at getting the support of state or congressional elected officials. Latino Minnesotans suffer from a lack of resources. Companies take advantage of workers by not paying equitably and otherwise discriminating against them, either in the form of disparate employment benefits (e.g., vacation or sick leave), or in the form of substandard housing conditions. Many Latino residents lack health insurance and access to local resources.
10. Keeping Latino and other persons of color communities together in Congressional District 7 will give us a better opportunity for unified representation.
11. Keeping these same communities together in Senate District 22—Worthington in House District 22A, and St. James and Madelia in House District 22B—and combining them with the 6 counties to the west and north of Nobles County (Lincon, Lyon, Murray, Pipestone, Redwood, and Rock) in forming Congressional District 7 makes a lot of sense. Many Latino and persons of color community members in this region receive social

services from a single collaborative group known as Southwest MN Health and Human Services (as well as Cottonwood and Jackson Counties between Worthington and St James/Madelia, which call themselves Des Moines Valley Health and Human services), which also provide social services as a collaborative. We want all 8 of these counties—with Nobles and Watonwan—to be kept within the same congressional district, because we utilize the same crucial services provide by the same providers.

I declare under penalty of perjury of the laws of the United States and the state of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021

jovita f.m
jovita f.m (Dec 6, 2021 11:09 CST)

Jovita Francisco

Final Jovita Francisco Declarant - Southwest MN

Final Audit Report

2021-12-06

Created:	2021-12-06
By:	Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAANKhtJYknulRaB39wZ7LxEu8s5WGi5K1v

"Final Jovita Francisco Declarant - Southwest MN" History

 Document created by Annastacia Belladonna-Carrera (abelladonna@commoncause.org)

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 Document emailed to jovita f.m (jovis4525@gmail.com) for signature

2021-12-06 - 3:55:10 PM GMT

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2021-12-06 - 3:55:20 PM GMT

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2021-12-06 - 3:55:21 PM GMT

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2021-12-06 - 5:09:10 PM GMT- IP address: 74.125.212.73

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Signature Date: 2021-12-06 - 5:09:50 PM GMT - Time Source: server- IP address: 172.58.83.170

 Agreement completed.

2021-12-06 - 5:09:50 PM GMT

FILED

December 8, 2021

**OFFICE OF
APPELLATE COURTS**

**STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546**

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Ngawang Dolker
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Ngawang Dolker, declare as follows:

1. I was born on May 18, 1987, in India. I am a United States citizen of Tibetan descent. I am a resident of Fridley, Minnesota. I immigrated to the United States and moved to Minnesota in 1996.

I support the proposed boundaries for House District 35A to keep together our growing Tibetan communities that are living and growing in this district for the past decade. The Tibetan communities in Fridley and New Brighton want to be kept together and have unified representation because we constitute a distinct community in Minnesota with specific cultural ties and common issues.

2. I serve as the President of the Tibetan American Foundation of Minnesota (TAFM).
3. TAFM is a registered non-profit organization under 501(c)(3). TAFM was formed in 1992 to aid in the resettlement of Tibetan immigrants to the state of Minnesota. Under the Immigration Act of 1990, the United States granted one thousand immigrant visas to Tibetans living in India and Nepal. Minnesotan families volunteered and helped host 160 Tibetans and helped them settle in the Twin Cities area from 1992-93.

4. Because of how Tibetans migrated to the United States and settled in Minnesota in the 1990s, under the “immigrant” status, Tibetans were not eligible for any public assistance funds. Tibetan immigrants had to prove their self-sufficiency before migrating to the United States and finding jobs within a few months of arriving in Minnesota. This led to strong community organizing and support for each other in the Tibetan Minnesotan community. Since then, Tibetans have worked hard against all odds to build a thriving and exemplary community that places a strong emphasis on self-reliance and education.
5. Over the years, with gradual family reunification, Minnesota is now home to the second largest Tibetan American community in the United States. The Tibetan Minnesotan population is now 5,000 strong and continues to grow.
6. Most of the Tibetans reside in and around the Twin Cities region. We are largely concentrated in Whittier neighborhood of Minneapolis, Northeast Minneapolis, New Brighton, Fridley, St. Louis Park, and in northern Hennepin County.
7. Beyond language, culture, and ethnic identity, Tibetan Minnesotans share a similar economic interest. We are overwhelmingly represented in the health care industry such as nurses, nursing assistants, cooks, housekeepers, and other hospital staff in the major hospitals located in Hennepin County.
8. Today, Tibetans in Minnesota live in a compact and united community. We formed organizations such as TAFM to serve as a nexus. TAFM is committed to preserving and promoting the rich Tibetan cultural and spiritual heritage under the leadership of His Holiness the Dalai Lama. TAFM’s programs include Tibetan language schools, traditional music, dance lessons, sports, youth mentorship, after-school programs, spiritual services, social services to the elderly, scholarships, community-health prevention education, civic organizing, and community events. These programs are aimed to preserve and promote Tibetan cultural tradition and civically engage all Tibetan Minnesotans. Additionally, through the social services programs, TAFM continues to address multiple challenges faced by Tibetan Minnesotans such as language barrier, addressing health education and vaccine delivery during covid pandemics, and job search, etc.
9. As a vibrant minority group in the state of Minnesota, the Tibetan American community needs equal opportunities to participate in the political process under a fair redistricting process so that our economic and community interests are fairly represented. We ask that the Minnesota Tibetan community be kept intact in the same United States House of Representative district and Minnesota State House of Representative District and Minnesota State Senate. We believe in this way that the Tibetan community’s interest will be better served.

10. We support the Corrie Plaintiffs' proposed map of House District 35A, Senate District 35, and the 3rd Congressional District, all of which will unify the Tibetan community.

I declare under penalty of perjury of the laws of the United States and the State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 5, 2021


Ngawang Dolker (Dec 5, 2021 14:20 CST)

Ngawang Dolker

Sources

International Institute of Minnesota, <https://iimn.org/publication/finding-common-ground/minnesotas-refugees/asia/tibetans/>

“In 1992 Minnesota received 160 immigrants of Tibetan origin. These were all adults that eventually secured the resources necessary to bring their family members to the U.S. Presently the Tibetan community in Minnesota is **estimated to have a population of 800, the second largest Tibetan community in North America**. Large concentrations of Tibetans can be found in the **Whittier neighborhood of Minneapolis** and in **northern Hennepin County** where some seventy families have become homeowners.”

Tibetan American Foundation of Minnesota, <https://tafm.org/about/>

“U.S. Congress under the Immigration Act of 1990 granted one thousand immigrant visas to Tibetans living in India and Nepal. With the help of a group of volunteers and American host families, 160 Tibetans were settled in the Twin Cities area in 1992-93. Over the years, with gradual re-unification of family members, the Twin Cities’ Tibetan American population increased many fold to approximately **three thousand and continuing to grow**. Minnesota now has the **second largest Tibetan American community in the United States**. Most of the Tibetans reside in and around the areas of Minneapolis and Saint Paul. Tibetan new arrivals to Minnesota under the “immigrant” status are not eligible for any public assistance funds. In fact, prospective Tibetan immigrants have to prove their self sufficiency prior to setting foot in the United States. Since their first arrival in the state of Minnesota in 1992, Tibetans have worked hard against all odds to build a thriving and exemplary community that place strong emphasis on self reliance and education.”

Northeaster Newspaper, *Local Tibetans focus on future in Northeast*, <https://www.mynortheaster.com/news/local-tibetans-focus-on-future-in-northeast/>

“Since the arrival of these first Tibetan immigrants, the Tibetan population in the Northeast area has boomed. Attempts to track residents statewide have not kept up with the community’s swift increase. Tibetans from around the world relocate to Minnesota, drawn by a stable economy and job opportunities, as well as a welcoming community of fellow Tibetans. Minnesota now has the **second largest concentration of Tibetans in the United States**, surpassed only by New York.

‘It’s a stable place,’ says Ngawang Dolker, a Tibetan immigration lawyer who came to Minnesota in 1997 to reunite with her mother, one of the 162 Tibetans who had arrived five years earlier. ‘It’s a good place to raise a family. Job opportunities are good, schools are good ... **Even [Tibetans] from other states, they relocate here.**’

Donna Schmitt, the mayor of **Columbia Heights**, estimates that in her city alone there are nearly **4,000 Tibetans—a staggering 20 percent of the entire city population**—but says that an accurate count is difficult.”

“Regardless of the community’s true size, local Tibetans are making their presence felt. Gyuto Wheel of Dharma Monastery, located on the corner of 26th and Taylor Street in Minneapolis, is the **first Tibetan Gyuto Monastery in the United States**. Jalue Dorje, an 11-year-old Columbia Heights resident, has been identified as the eighth incarnation of the Taksham Lama, making him **the first reincarnated Lama to**

be born in Minnesota. And beyond establishing ways to maintain cultural relevance in a strange new country, Tibetans are contributing to the local scene and sharing their heritage with others.”

Updated Ngawang Dolker Tibetan Declaration (1)

Final Audit Report

2021-12-05

Created:	2021-12-05
By:	Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAASD4VOxs-RFRoZ3pNqbXaiQXoMSFlxhe

"Updated Ngawang Dolker Tibetan Declaration (1)" History

 Document created by Annastacia Belladonna-Carrera (abelladonna@commoncause.org)

2021-12-05 - 6:14:48 PM GMT- IP address: 73.65.0.179

 Document emailed to Ngawang Dolker (president@tafm.org) for signature

2021-12-05 - 6:15:12 PM GMT

 Email viewed by Ngawang Dolker (president@tafm.org)

2021-12-05 - 6:15:13 PM GMT- IP address: 72.14.199.88

 Document e-signed by Ngawang Dolker (president@tafm.org)

Signature Date: 2021-12-05 - 8:20:05 PM GMT - Time Source: server- IP address: 73.65.40.104

 Agreement completed.

2021-12-05 - 8:20:05 PM GMT

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STATE OF MINNESOTA
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Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Melvin Falla
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Melvin Falla, declare as follows:

1. I am Melvin Falla and I've lived in Chaska, MN for twenty-three years and have personal knowledge of where the largest populations of Latino families in this area live. I am one of just over 2,000 Latino residents of Chaska.
2. We support the proposed boundaries for House District 50A keeping the southeast part of Chaska, especially the Riverview Terrace Mobile Home Park, together with Jackson township and the northern part of Shakopee; and for Senate District 50 that keeps all of Chaska, Jackson, and Shakopee together. Our communities have been calling these areas home for decades. We share values, cultural ties, and economic interests. We want to be kept together and have unified representation because we constitute a distinct community in that region with specific common issues such as affordable housing, education, employment, and entrepreneurial interests. Keeping these communities in the same voting districts will allow us to work together to have our common issues addressed by elected officials.
3. It is important for the Latino communities in Minnesota to have a voice in our state's politics. For our communities to receive the services that they need, they must have a representative who can speak for them at all levels of government.
4. Latino Minnesotans represent about 9.6 percent of the population in Chaska and just over 4.4 percent of those living in Carver County.
5. Dozens of modern industries have located to Chaska and continue to do so; construction of homes add about 300 to 400 new homes per year; commercial business continues to

expand offering a variety of retail and service opportunities for our growing community. More of us have moved to the area looking for work, the opportunity to buy homes and raise our families. Our Latino community grew particularly after the construction of the Highway 212 freeway passing through the heart of Chaska. It provides a fast, and direct link to the resources in the Metro area. We also have a bus rapid transit route serving Chaska with fast mass transit, along with convenient access to the Light Rail system which connects the southwest suburbs to the Metro.

6. The Chaska Market is an example of many of our local Latino-owned small businesses that have contributed to the economic growth in Chaska. We have small businesses selling anything from piñatas, fresh meats at the deli, to having a small dining area serving hot-out-of-the-kitchen authentic Mexican dishes. This grocery store is one of five Latino-operated businesses in the City Square Center along Fourth Street, across from Chaska City Hall.
7. Over the years, this strip mall has become a hub for Latino commerce. However, these businesses were recently threatened by the city's plans for the City Square West redevelopment. Every Latino business owner would be displaced and lose everything they've worked for with no local representation that is willing to listen to our concerns or interests because our collective voice is diluted in being divided and not kept together.
8. Other business that have flourished in Chaska include a party supply store called Innovaciones Varela, the Chaska My Love restaurant, and El Paisano Bakery. These are all central shopping places for Latino communities in Shakopee and Chaska featuring our foods, services, and products. We also go to the Latino business in Shakopee, they have restaurants and bakeries.
9. The Latino community in Chaska has worked hard to create a supportive enclave with strong cultural ties. I request that you draw districts that keep the Latino communities in Chaska and Shakopee together. It is important for our communities to have the ability to vote for candidates that best represent their shared values, interests, and culture.

I declare under penalty of perjury of the laws of the United States and the State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021


Melvin Falla (Dec 6, 2021 19:47 CST)

Melvin Falla

Final Melvin Falla Declaration Shakopee-Chask area (3)

Final Audit Report

2021-12-07

Created:	2021-12-07
By:	Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA0yB3ZSmdu5ceAenb4msmSKuPze0JgZIJ

"Final Melvin Falla Declaration Shakopee-Chask area (3)" History

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2021-12-07 - 1:21:55 AM GMT
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2021-12-07 - 1:22:05 AM GMT
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2021-12-07 - 1:22:12 AM GMT- IP address: 172.58.84.212
-  Document e-signed by MelvinFalla (melvinfalla159@hotmail.com)
Signature Date: 2021-12-07 - 1:47:04 AM GMT - Time Source: server- IP address: 67.4.85.103
-  Agreement completed.
2021-12-07 - 1:47:04 AM GMT

FILED

STATE OF MINNESOTA
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Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

vs.

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and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

**Declaration of Cecilio Palacio
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Cecilio Palacio, declare as follows:

1. I am one of about 3,036 Latino residents of Faribault, Minnesota, which is in Southeast Minnesota. I have lived in Faribault for over twenty years and have personal knowledge of where the largest populations of Latino families in this area live.
2. I support the Corrie Plaintiffs' proposed boundaries for House Districts 25A and 25B because they keep Latino communities that have been living, working, and growing the local economies in the Northfield-Faribault areas for the past several decades together.
3. The Latino communities in this region share values, cultural ties, and economic interests. We want to be kept together and have unified representation because we constitute a distinct community in that region with specific common issues such as affordable housing, education, employment, and entrepreneurial interests. Keeping these communities in the same voting districts will allow us to work together to have our common issues addressed by elected officials.
4. Early Latino immigrants to this region came in search of opportunity through farm labor programs during World War II. Since I moved to Faribault 20 years ago, the community has become much more diverse. It now has a population of about 23,530. Latinos are the second-largest population, representing 12.4 percent of Faribault's residents, followed by 9.2 percent Black population. While the city has lost close to 7.9 percent of its white population, our Latino communities have grown by 7.4 percent, making up for the loss to not just the local population but our local economy's stability and growth.

5. Our city has seven mobile home park communities. Each has a large population of Latino residents. The Latino communities are particularly vibrant in the mobile home communities of Cannon River Mobile Home Park, Evergreen Mobile Home Park, Copaco Mobile Homes, and Knowlwood Mobile Homes.
6. Our growing influence can be seen in the local festivities, like when several Mexican American community members led in the singing of Mexico's national anthem during the International Festival at Faribault's Central Park. This was a community event hosted by the Faribault Diversity Coalition.
7. Northfield and Faribault are cities in Southeast Minnesota that have seen significant growth in their Latino population over the last few decades. Northfield is partly in Rice County and leads the region in the number of Latino families establishing roots. Most of the Latino communities living in Northfield are on the Rice County side and not in Dakota County. The City of Faribault is also in Rice County and shares many resources and needs.
8. Many of the Latino community members in the region, particularly in Northfield, come from the same area of Mexico, the state of Veracruz, and have followed friends, family, and opportunities for a better life in Minnesota. Communities like the one in Viking Terrace are heavily Latino, with unique needs such as affordable housing.
9. Education within Latino communities across these cities is a key issue for keeping these communities together for proper representation. Faribault has one of the state's lowest Latinx graduation rates in the state, while Northfield has been making considerable progress towards improving educational access.
10. Despite progress over the last few decades, these communities are still heavily segregated.
11. I support the Corrie Plaintiffs' proposed redistricting plan, which unifies the Latino communities in our region within proposed House District 25A and 25B.

I declare under penalty of perjury of the laws of the United States and the state of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021

 (Dec 6, 2021 19:11 CST)

Cecilio Palacio

Cecilio Palacio Declarant Northfield-Faribault

Final Audit Report

2021-12-07

Created:	2021-12-06
By:	Anastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAY6o4P7EPAM-lqhREggDgw1s7EpmZzpIN

"Cecilio Palacio Declarant Northfield-Faribault" History

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2021-12-06 - 7:57:59 PM GMT- IP address: 74.125.212.73
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2021-12-06 - 7:58:00 PM GMT
-  Email sent to brian.dillion@lathropgpm.com bounced and could not be delivered
2021-12-06 - 7:58:06 PM GMT
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Signature Date: 2021-12-07 - 1:11:49 AM GMT - Time Source: server- IP address: 172.58.86.151
-  Agreement completed.
2021-12-07 - 1:11:49 AM GMT

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STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

December 8, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Wali Dirie
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Wali Dirie, declare as follows:

1. I am a member of the Somali community of Minneapolis. I am the Executive Director of the Islamic Society of America – Dar Al-Hijrah Mosque, and I reside in House District 60B, in the Cedar-Riverside Area of Minneapolis.

We support the proposed boundaries for House District 60A keeping together the predominantly East African communities that have been living, working, and flourishing in the Cedar-Riverside area for the past few decades. Our communities want to be kept together and have unified representation along with other African communities because we constitute a distinct community in Minnesota with specific cultural ties and common issues.

2. Minnesota is home to more than 85,000 Somali, Ethiopian, and other East Africans, many of whom live in the Twin Cities. The Somali, Ethiopian and other East African communities face challenges that are unimaginable to our native-born neighbors: many of us came to Minnesota to escape civil war, political repression, and severe poverty. We came to Minnesota because of this state's history of generosity toward new immigrants. While being welcomed here, members of our community still have had to deal with learning a new language and culture while healing the psychic wounds of war and displacement.
3. These challenges bear themselves out in statistics: for example, according to StatisHealth, "34 percent of Somalis in Minnesota ages 25-64 do not have a high school diploma or GED, compared to 6 percent of all Minnesotans; Somali adults have roughly 2–3 times higher rates of unemployment than the state overall [and] 83 percent lives in or near the federal poverty threshold." Similarly, the median income for Ethiopian Americans is only 72 percent of the median income for the overall U.S. population.

4. Despite these challenges, many East Africans have thrived, building small businesses along Minneapolis' Lake Street Corridor, but even here we faced distinct hardships after the civil unrest of 2020 and the COVID pandemic. Many East African business owners lacked insurance or the wherewithal to navigate the application system for government assistance.
5. Our community has formed a network of social service, health, and economic development organizations to help new arrivals and assist with economic development. Our networks build upon our strengths—systems that involve elders, faith leaders, men and women who are trusted and chosen by our community.
6. For Somalis and Oromo (East African) to make effective, community-oriented decisions, we need to engage those voices, we need to know that our community structures can work with mainstream systems (healthcare, schools, public safety). Breaking up our community structure does deep harm to how we effectively participate in our democracy. It is crucial to keep our community intact, to protect our ability to effectively participate in Minnesota's civic life by allowing us the opportunity to elect representatives who understand our community's unique culture.
7. The Corrie plaintiffs' map House District 60A succeeds in keeping together East African communities in the Ceder-Riverside communities of Minneapolis, Minnesota in a way that provides us with effective representation in the U.S. House of Representatives and the Minnesota State Legislature. I urge the court to adopt these maps.

I declare under penalty of perjury of the laws of the United States and the state of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021


Wali Dirie (Dec 6, 2021 19:25 CST)
Wali Dirie

DRAFT East African COI narrative

Final Audit Report

2021-12-07

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By:	Annastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAACXJ1ulk_9sdYtuw_Tw9XcTT_X6JMU0XW

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2021-12-05 - 11:50:25 PM GMT

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Signature Date: 2021-12-07 - 1:25:34 AM GMT - Time Source: server- IP address: 96.67.171.86

 Agreement completed.
2021-12-07 - 1:25:34 AM GMT

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STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

December 8, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Nelima Sitati Munene
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Nelima Sitati Munene, declare as follows:

1. I am the executive director of the African Career, Education, & Resource (ACER). ACER is the leading organization working with African immigrants in the northwest suburbs. An estimated 4,500 African immigrants live in the northwest suburbs, hailing primarily from Liberia, Somalia, and Nigeria. ACER has served these communities and has been an integral part of the community for almost fourteen years.
2. We support the proposed boundaries for House District 55B, 56A and 56B keeping together the West and East African communities that have been living, working, and flourishing in the Brooklyn Park and Brooklyn Center area for the past decade together. The West African communities in Brooklyn Park and Brooklyn Center want to be kept together and have unified representation along with other African communities because we constitute a distinct community in Minnesota with specific cultural ties and common issues.
3. It is important for the African community of Minnesota to have a voice in our state's politics. For Africans to receive the services that they need, they must have a representative who can speak for them in government.
4. Brooklyn Center, which along with Brooklyn Park is referred to locally as "Little Monrovia," has seen its population of Black residents increase significantly in the past 30 years. In 1990, only 5 percent of the population identified as Black; that number increased to 14 percent in 2000, and again to nearly 26 percent in 2010. As of the 2020 census, only 44.5 percent of Brooklyn Center's residents identify as White only; of the 54.5 percent that do not, 29 percent identify as Black. New African residents are drawn to Brooklyn Center and Brooklyn Park in large part due to the social support networks, as well as African restaurants, shops, and services.

5. Close to 40,000 Liberian Americans call Minnesota home, most living in Brooklyn Park and Brooklyn Center. About one-fifth of the residents of Brooklyn Center and Brooklyn Park trace their roots to West Africa. Other African groups with large populations are the Nigerian and Kenyan population as well as other West Africans from Guinea and Sierra Leone.
6. The first wave of Liberian immigrants arrived in Minnesota in the 1950s, when a Liberian ore company began sending workers to Minnesota for mining operations training. The second wave arrived in the mid-1980s, after political unrest caused many Liberians to seek refuge in the United States. The mid 1980s saw a continued steady flow of people of African descent with a huge growth of the population in the 1990s that has continued to grow into the 2000s.
7. Brooklyn Center's current Mayor, Mike Elliot, is Liberian-American, and emigrated to Minnesota from Liberia at age 11 with his family. Mayor Elliot was elected in 2018 and became the Twin Cities suburbs' first Black mayor. Wynfred Russell, who is also Liberian-American, joined Brooklyn Park's city council in January 2019. The African community is proud to finally have been able to elect their chosen representatives, and it is vital that the voting power of the community be preserved.
8. The African community has worked hard to create a supportive enclave with strong cultural ties. I request that you draw districts that keep the African communities in Brooklyn Center and Brooklyn Park together. It is important for the African community to have the ability to vote for candidates that best represent their shared values, interests, and culture.

I declare under penalty of perjury of the laws of the United States and the State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 6, 2021

Nelima Sitati Munene
Nelima Sitati Munene (Dec 6, 2021 20:35 CST)

Nelima Sitati Munene

Sources

<https://sites.google.com/a/macalester.edu/refugees/liberians>

The Liberian refugee population in Minnesota has increased substantially over the past few years. In 2005, Minnesota resettled 6,357 total refugees, a number which has only been exceeded by California. Currently, it is estimated that 25,000 Liberians live in Minnesota, most of whom live in or near Brooklyn Park and Brooklyn Center. An estimated one fifth of the 100,000 residents in these communities are West Africans (Minnesota Department of Health). Many of the Liberians run small businesses such as beauty salons that are frequented by their fellow countrymen. Liberians in the community also distinguish themselves with their love and support of the game of soccer (Schmickle July 18, 2005).

<https://www.minnpost.com/new-americans/2016/09/why-arent-there-more-or-any-liberian-american-candidates-running-office-minnes/>

Liberians are among of the oldest immigrant groups in the state. The first wave arrived in Minnesota in the 1950s, when an ore company in the West African nation began sending workers to the Iron Range and the University of Minnesota for advanced training in mining operations. After the training, many never went back home. “A number of those Liberians are still around,” said Russell.

The second wave arrived in the mid-1980s, after a failed coup triggered ethnic tensions and political upheaval, prompting some Liberians to seek refuge in the United States.

Today, community leaders estimate that up to 40,000 Liberians live in Minnesota, with the largest concentrations in the Minneapolis suburbs of Brooklyn Park and Brooklyn Center.

“Anywhere you go in these cities, you’ll hear people speaking Liberian English,” said Abdullah Kiatamba, a Liberian-American who heads the Brooklyn Park-based African Immigrant Services. “We have changed the face of the city. We have created businesses. We are everywhere, I swear to God.”

https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1097&context=gc_etds

In contrast, the areas in which Liberians reside in Brooklyn Park and Brooklyn Center are ethnic communities rather than immigrant enclaves. Adjacent to one another, approximately 10 miles northwest of Minneapolis, the two suburbs are racially diverse. Brooklyn Park—the suburb with the larger Liberian population—has a population of 75,781, according to the 2010 U.S. Census, which is approximately 50 percent white, 25 percent African American, and 15 percent Asian. Liberians are drawn to the city due primarily to the cost and availability of housing and access to transportation, and secondarily to the proximity to social support networks, as well as African restaurants, shops, and services.

Although Liberians report being attracted initially to Brooklyn Park due to its affordability rather than due to a desire to live in a Liberian neighborhood, almost all Liberians interviewed reported

having benefited from social networks in the area. Most Liberians in Brooklyn Park moved there on the recommendation of friends or family and reported receiving assistance, especially rides and help finding jobs, from fellow Liberians.

Nelima Sitati Munene Declaration - Brooklyns

Final Audit Report

2021-12-07

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By:	Anastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAHz0zvxpCS0YRCjFTXfDgFSEc7dwftwm

"Nelima Sitati Munene Declaration - Brooklyns" History

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Signature Date: 2021-12-07 - 2:35:16 AM GMT - Time Source: server- IP address: 24.131.144.223
-  Agreement completed.
2021-12-07 - 2:35:16 AM GMT

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STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

December 8, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**Declaration of Monica Bryand
in Support of the Corrie Plaintiffs'
Proposed Redistricting Plan**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

I, Monica Bryand, declare as follows:

1. I am a second Mexican American resident of Saint Paul's West Side. I've lived on the West Side for over 45 years and have extended family that have been here for generations.
2. Saint Paul's West Side is a distinct and unique community, not only because it is the only part of Saint Paul on the "west" side of the Mississippi River, but because the West Side is home to the largest Latino community in Saint Paul. More than a quarter of the West Side is Latino, compared to less than 10 percent across the rest of Saint Paul.
3. People of Mexican descent began to come to Saint Paul in the early 20th century, around the time of World War I. Many of these people settled in the West Side, and many Latino families in the West Side have resided here for generations, spanning nearly a century. In the early 90s the diversity of the area exploded to include other Latinos such as Puerto Ricans,
4. Many individuals that settled in the West Side were drawn to Saint Paul for job opportunities in the meatpacking and railroad industries, and as more individuals came with their families seeking opportunity, the West Side grew exponentially, leading even to a housing shortage in the neighborhood at the end of the 1930s. The Latino community in the West Side continued to grow throughout the 20th century, particularly in the 1980s and the boom of immigration from not only Mexico but Central America.
5. The Latino community in the West Side has persisted despite challenges across the decades, through floods in the 1950s and "urban renewal" projects that displaced

community members in the 1960s. As the community has expanded so have culturally specific community resources such as La Clinica, afterschool community library programs in Spanish, and adult daycare that is focused on celebrating the cultural similarities among its Spanish-speaking patients.

6. The heart of the Latino community in Saint Paul is in the West Side, known as District del Sol, home to iconic Latino-owned businesses that have been in our community for generations, from restaurants like Boca Chica to grocers such as El Burrito Mercado. Such businesses have been mainstays in the West Side and anchor the Latino community's continue strength in this region. Approximately 50 percent of the businesses within the primary commercial district of the West Side, District Del Sol, are Latino-owned.
7. The impact of the predominantly Mexican culture and community is readily visible throughout the West Side, from our diverse business district featuring foods, clothing, and art from various regions of Mexico and Latin America, to public art projects, including murals that adorn its walls, and having a main street named after the Mexican American historical figure Cesar Chavez.
8. Each year, the Cinco de Mayo celebration in Saint Paul is not only the largest in the Twin Cities, but one of the largest in the United States. For decades prior to challenges presented by COVID-19, the Cinco De Mayo event in the West Side has brought together families, friends, and community members for live entertainment, a parade, and so much more. It's been known as a place where all Minnesotans gather to celebrate the many contributions of Minnesotans from Mexican heritage.
9. The West Side of Saint Paul is one of the oldest Mexican and Chicano communities in Minnesota. The cultural strength and economic vibrancy unique to this predominantly Mexican American community demands protection in the redistricting process. The Latino community and the West Side of Saint Paul must be kept intact to ensure that community members have the opportunity to elect representatives that better serve our unique and dynamic interests and that our voting power is not diluted. The proposed districts, including House District 67A covering the West Side, presented by the Corrie plaintiffs keep our community intact and ensure effective representation.

I declare under penalty of perjury of the laws of the United States and the State of Minnesota that the foregoing is true and correct to the best of my knowledge.

Dated: December 3, 2021

Monica Bryand

Monica Bryand (Dec 3, 2021 19:07 CST)

Monica Bryand

Monica Bryand St Paul West Side Declarant

Final Audit Report

2021-12-04

Created:	2021-12-03
By:	Anastacia Belladonna-Carrera (abelladonna@commoncause.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAATFv5IVXkMMu9nNJrXrjRVrbXJZPDTHWJ

"Monica Bryand St Paul West Side Declarant" History

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2021-12-04 - 1:07:35 AM GMT