

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

**THE CORRIE PLAINTIFFS’
NOTICE OF MOTION AND MOTION
TO ADOPT THEIR PROPOSED
CONGRESSIONAL AND
LEGISLATIVE REDISTRICTING
PLANS**

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.

TO: THE ABOVE-NAMED PARTIES:

NOTICE

PLEASE TAKE NOTICE, that on January 4, 2022, Plaintiffs Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpaoo Lee, Abdirazak Mahboub, Aida Simon, Beatriz Winters, Common Cause, OneMinnesota.org, and Voices for Racial Justice (“Corrie Plaintiffs”), by and through their undersigned counsel, will move the Minnesota Special Redistricting Panel for the relief requested below.

MOTION

Pursuant to the Minnesota Special Redistricting Panel (the “Panel”) Order dated October 26, 2021 and Order Stating Preliminary Conclusions, Redistricting Principles, and Requirements for Plan Submissions dated November 18, 2021, the Corrie Plaintiffs bring

this motion before the Panel seeking its adoption of the Congressional and Legislative Redistricting Plans filed by the Corrie Plaintiffs in this case.

This Motion is supported by the record and all of the proceedings in this matter, including declarations and legal memoranda to be filed in support of each motion in accordance with Orders entered by the Panel.

LATHROP GPM LLP

Dated: December 7, 2021

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Plaintiffs,

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Plaintiff-Intervenors

**CORRIE PLAINTIFFS'
MEMORANDUM IN SUPPORT OF
CONGRESSIONAL 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,

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Gillespie, Xiongpaoo Lee, Abdirazak
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Defendant.

I. Introduction

The Corrie Plaintiffs intervened in this action to ensure historically underrepresented Black, Indigenous, and Persons of Color (“BIPOC”) communities throughout Minnesota would be separately and adequately represented in the process by which Minnesota’s congressional and legislative districts are redrawn. With the help of BIPOC community members and coalition partners throughout the state, the Corrie Plaintiffs developed the proposed Congressional Redistricting Plan¹ that is submitted with and further supported by this memorandum and accompanying declarations and reports.

¹ The Corrie Plaintiffs’ Proposed Congressional Maps are attached as Exhibits H through N to the Declaration of Amy Erickson in Support of the Corrie Plaintiffs’ Congressional Redistricting Plan.

The Corrie Plaintiffs’ redistricting plans were uniquely developed through a nonpartisan, grassroots campaign designed maximize the participation of BIPOC communities in the 2020 Census process, and to then amplify their voices in this redistricting process. Because these communities are the fastest growing communities in the state, and because they continue to bear the brunt of discriminatory initiatives that would restrict voting and other legal rights, the Panel should pay particular attention to the plan the Corrie Plaintiffs developed with interests of BIPOC communities at the center.

The Panel has already expressed a commitment to preserving communities of people with shared interests “whenever possible to do so” in compliance with other redistricting principles. (Order Stating Preliminary Conclusions, Redistricting Principles, and Requirements for Plan Submissions at 7, Nov. 19, 2021, hereinafter, the “Principles Order”.) The Corrie Plaintiffs’ Congressional Redistricting Plan does exactly that—preserving BIPOC and other communities whenever possible and consistent with other redistricting principles, in an effort to make government responsive to their shared interests.

II. Grassroots Origin of Plan

The Corrie Plaintiffs’ Redistricting Plan (a/k/a the “Unity Map”) was developed as part of the Our Maps MN Campaign—a nonpartisan, grassroots campaign committed to a community-focused, accessible, and transparent redistricting process. (*See generally* Declarations of May Yang (“Yang Declaration”) and Annastacia Belladonna-Carrera (“Carrera Declaration”).) The Unity Map is a natural extension of work done in connection with the 2020 Census by the Minnesota Census Mobilization Partnership (“Census

Partnership”), which created 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. (*Id.*) The Census Partnership was particularly focused on securing and organizing resources to ensure full participation in the 2020 Census by historically undercounted BIPOC communities throughout Minnesota. (*Id.*) 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. (*Id.*)

Following the Census Partnership’s unprecedented effort to ensure historically undercounted communities were counted during the 2020 Census, the Our Maps MN Campaign turned its attention to making sure these same communities were recognized and fairly represented in the redistricting process. (*Id.*) In 2021, the Campaign worked diligently to engage Minnesota’s BIPOC and other historically underrepresented communities in the redistricting process, in order to ensure the redistricting plans ultimately adopted reflect the input of these communities. (*Id.*) As part of the Campaign, the Minnesota Council on Foundations (“MCF”) partnered with 12 BIPOC-led and serving organizations in a coordinated effort to develop community of interest maps across the State. (Yang Declaration ¶ 7.) In addition to MCF, the organizations that participated in this effort include: African Career, Education & Resources, Inc.; Anika Foundation; Asian American Organizing Project; CAPI USA; Communities Organizing Latinx Power and Action (“COPAL MN”); Deaf Equity; Hispanic Advocacy and Community Empowerment

through Research (“HACER”); Islamic Civic Society of America; Native American Community Development Institute; Pillsbury United Communities; The Council on American-Islamic Relations (“CAIR”); and Voices for Racial Justice (collectively, the “Unity Cohort”). (*Id.*) As part of the Campaign, Common Cause also partnered with trusted local community leaders and organizations like UNIDOS and the Minnesota Immigrant Movement, who have been working with Indigenous and communities of color with longstanding local networks in greater Minnesota—in places like Faribault, Northfield, Rochester, Worthington, Madelia, St. James, Chaska, Shakopee, and Mankato, to name just a few—to raise awareness about the redistricting process, generate interest in mapping sessions, and drive turnout at the Special Redistricting Panel’s public comment sessions. (Carrera Declaration ¶¶ 5-6.)

During the current redistricting cycle, the Unity Cohort led over 100 hours of training, redistricting education and awareness sessions, community outreach and engagement, listening sessions, and map drawing. (Yang Declaration ¶ 8.) 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 across the state. (*Id.*) Through this engagement, more than 40 “community of interest” maps were developed, based on information shared by community members about their shared experiences. (*Id.*) The Unity Cohort eventually combined the community of interest maps into the statewide Unity Map, which ultimately was incorporated into the Corrie Plaintiffs’ Proposed Redistricting Plan. (*Id.* ¶ 9.) The Unity Cohort met bi-weekly for two-hour mapping sessions with redistricting and geographic information system professionals to

help guide the process. (*Id.*) During each session, time was dedicated to discussing the community of interest maps, population growth and demographic shifts reflected by 2020 Census, and the impact these changes are having and are expected to have on communities of interest going forward. (*Id.*)

Because a key goal of the Unity Map (incorporated into the Corrie Plaintiffs' Redistricting Plan) was to advance a community-centered redistricting plan, ample time in the sessions was dedicated to participants sharing information about their communities and the elements that shape and bind them together. (*Id.*) 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. (*Id.*) After developing drafts of the Unity Map, Unity Cohort members took their work back to their communities to elicit feedback. (*Id.*) The feedback was then reported back to the Cohort, and additional changes were made to best reflect community interests in balance with other criteria. (*Id.*) This process continued until the Unity Cohort reached consensus on the district boundaries reflected in the Unity Map. (*Id.*)

The Our Maps MN Campaign and the iterative process by which community members and community-led organizations developed the Corrie Plaintiffs' Redistricting Plan 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. The Corrie Plaintiffs' Redistricting Plan was created by the people and for the people—by engaged members of Minnesota's BIPOC and other historically underrepresented communities, 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 in Congress and the Minnesota Legislature more responsive to the interests of BIPOC Minnesotans and other communities of interest, the Corrie Plaintiffs ask the Panel to adopt the Corrie Plaintiffs' Proposed Redistricting Plan.

III. Description of the Corrie Plaintiffs' Congressional Plan

In proposing their Congressional Redistricting Plan, the Corrie Plaintiffs' primary goals are to ensure that: (1) Minnesota's BIPOC communities can participate in the political process and elect candidates of their choice; and (2) the rights and interests of communities of interest, and particularly BIPOC communities, are protected. Over the last decade, Minnesota's population growth was driven exclusively by population increases among its diverse BIPOC communities. In fact, from 2010 to 2020, Minnesota's BIPOC communities grew by 454,000 residents—a growth rate of 150 percent. By contrast, during the same time period, the state's White non-Hispanic population declined by 51,000 residents. (Brower, Susan, *Minnesota's Demographic and Census Overview for 2020 Redistricting*, Aug. 18, 2021, available at www.house.leg.state.mn.us/comm/docs/C3TfSEuiGkWTnghCkp9IYg.pdf.) Absent the dramatic population growth among Minnesota's BIPOC communities, the state undoubtedly would have lost its 8th Congressional seat. In order to be credible, the redistricting plan adopted by this Panel must account for population growth that continues to be driven by Minnesota's BIPOC communities.

The Corrie Plaintiffs' Congressional Redistricting Plan achieves the Corrie Plaintiffs' goals of protecting the rights and interests of Minnesota's BIPOC communities

and preserving communities of interest, thereby giving a voice to Minnesotans who have been historically underrepresented in Congress. For example, current Congressional lines separate major American Indian/Native American reservations in northern Minnesota into multiple congressional districts. The Corrie Plaintiffs' Congressional Map, in contrast, unites into one congressional district, CD 8, the three largest American Indian reservations (Red Lake Nation, White Earth Nation, and Leech Lake Band of Ojibwe) as well as other tribal reservations (such as Bois Forte, Fond do Lac, and Mille Lacs) and trust lands. The Latino/Hispanic community in the Chaska, Jackson, and Shakopee area, as well as the Shakopee Mdewakanton Sioux Community, are also brought into the one congressional district, CD 2.

Although the Corrie Plaintiffs' Congressional Redistricting Plan centers communities of interest, the Plan also complies with the other redistricting principles adopted by the Panel in the Principles Order. First, all Congressional Districts in the Corrie Plaintiffs' Congressional Redistricting Plan have a deviation of 0 or 0.01 from the ideal population. In addition, the Congressional Plan reflects districts of convenient, contiguous territory that are reasonably compact, as measured by more than one objective measure. Further, the Plan preserves a significant number of political subdivisions and was drawn in a neutral manner as to incumbents, candidates, and political parties.

In short, the Corrie Plaintiffs' Congressional Redistricting Plan complies with all of the redistricting principles articulated by the Panel in its Principles Order. The Corrie Plaintiffs respectfully request that the Panel adopt their Congressional Redistricting Plan.

IV. Compliance with the Redistricting Principles

A. Ideal Population

To afford each person equal representation, congressional districts must be nearly equal in population as practicable. *Wesberry v. Sanders*, 376 U.S. 1, 7-8 (1964); *see* U.S. Const. Art. I, § 2. Because a court-ordered redistricting plan must conform to a higher standard of population equality than a legislative redistricting plan, the goal is absolute population equality. *See Abrams v. Johnson*, 521 U.S. 74, 98 (1997). Minnesota’s total population is not divisible into eight congressional districts of equal population, making the ideal result six districts of 713,312 people and two districts of 713,311. (Principles Order at 4-5.) The Corrie Plaintiffs’ Congressional Plan complies with this principle.

| Congressional District | Population | Deviation from Ideal |
|------------------------|------------|----------------------|
| 1 | 713,315 | 0 |
| 2 | 713,312 | 0 |
| 3 | 713,315 | 0 |
| 4 | 713,299 | 0 |
| 5 | 713,291 | 0 |
| 6 | 713,339 | 0 |
| 7 | 713,282 | 0 |
| 8 | 713,341 | 0.01 |

(*See* Declaration of Amy Erickson in Support of the Corrie Plaintiffs’ Redistricting Plan (“Erickson Cong. Declaration”) Ex. A (“Population Summary Report”).)

B. Minority Voting Rights

Voting districts must not be drawn with the purpose or effect of denying or abridging the voting rights of any United States citizen on account of race, ethnicity, or membership in a language minority group. U.S. Const. Amends. XIV, XV; Voting Rights Act of 1965, 52 U.S.C. 10301(a) (2018) (Principles Order at 6). In fact, Districts must be drawn to protect the equal opportunity of racial, ethnic, and language minorities to participate in the political process and elect candidates of their choice, whether alone or in alliance with others. 52 U.S.C. 10301(b) (2018). The Corrie Plaintiffs’ Congressional Redistricting Plan complies with this principle.

Between 2010 and 2020, Minnesota’s BIPOC communities grew by 450,000, while Minnesota’s non-Hispanic White population declined by 51,000 residents. (Brower, *Minnesota’s Demographic and Census Overview for 2020 Redistricting*.) As a result, Minnesota’s BIPOC communities now make up 23.7% percent of the State’s population (an increase from 14.7% at the time of the 2010 census). (*Id.*) The population growth in Minnesota between 2010 and 2020 can be further broken down as follows:

| Race | 2010 | 2020 | Change 2010 to 2020 |
|-----------------------------------|-------------|-------------|--------------------------------|
| Non-Hispanic White | 4,405,142 | 4,353,880 | (51,262) |
| American Indian | 55,412 | 57,046 | 1,625 |
| Asian/Pacific Islander | 214,856 | 300,081 | 85,225 |
| Black/African American | 269,141 | 392,850 | 123,709 |
| Hispanic/Latino | 250,258 | 345,640 | 95,382 |
| Other Race | 5,947 | 20,963 | 15,016 |
| Two or More | 103,160 | 236,034 | 132,874 |
| Total | 5,303,925 | 5,706,494 | 402,569 |

(*Id.*) During this time period, Minnesota’s fastest growing cities were Minneapolis, St. Paul, Rochester, Lakeville, and Woodbury (in that order). (*Id.*) Counties with the largest numeric population gains include Hennepin (129,140 persons gained), Ramsey (43,712 gained), Dakota (41,220 gained), Anoka (33,043 gained), and Washington (29,432 gained). (*Id.*) Counties with the numeric largest populations losses include Winona (1,790 persons lost), Koochiching (1,249 lost), Renville (1,007 lost), Yellow Medicine (910 lost) and Pine (874 lost).

As a result of these population changes, the Second, Third, Fourth, Fifth, and Six Congressional Districts are currently overpopulated, and the First, Seventh, and Eight Congressional Districts are underpopulated. The statewide deviation from the ideal is 9.0%. If left unchanged, the current boundaries would cause an improper dilution of minority voting strength.

The Corrie Plaintiffs’ Congressional Redistricting Plan addresses this issue, reducing the statewide deviation to 0.01%. And, in doing so, the Corrie Plaintiffs’ Congressional Redistricting Plan creates four districts in which the minority voting age population is greater than 25 percent, meaning that minority voters in those districts can likely play a substantial, if not decisive role, in the electoral process. *See Georgia v. Ashcroft*, 539 U.S. 461, 482 (2003). (*See also* Erickson Cong. Declaration Ex. E (“Minority Voting-Age Population Report”).)

C. American Indian Tribes

The reservation lands of a federally recognized American Indian tribe will be preserved and must not be divided more than necessary to meet constitutional requirements. *See Michigan v. Bay Mills Indian Cmty.*, 572 U.S. 782, 788 (2014) (discussing sovereignty of recognized American Indian tribes). Placing discontinuous portions of reservations in separate districts does not constitute a division. (Principles Order at 6.) The Corrie Plaintiffs’ Congressional Redistricting Plan complies with this principle because it does not divide any federally recognized American Indian reservation land.

D. Convenient, Contiguous Districts

Districts must consist of convenient, contiguous territory. Minn. Const. art. IV 3; Minn. Stat. 2.91, subd. 2 (2020). Contiguity by water is sufficient if the body of water does not pose a series obstacle to travel within the district. Districts with areas that connect only at a single point will not be considered contiguous. (Principles Order at 6-7.) The Corrie Plaintiffs’ Congressional Plan complies with this principle. (*See* Erickson Declaration Ex. C (“Contiguity Report”).)

E. Political Subdivisions

Political subdivisions must not be divided more than necessary to meet constitutional requirements. Minn. Stat. 2.91, subd. 2; *see also Karcher v. Dagget*, 462 U.S. 725, 740-41 (1983); *Reynolds*, 377 U.S. at 580-81. (Principles Order at 7.) The Corrie Plaintiffs’ congressional plan complies with this principle. (*See* Erickson Cong. Declaration Ex. D (“Political Subdivisions Splits Report”)); *see also* Erickson Cong.

Declaration Ex. B (“Plan Components Report”).) The Corrie Plaintiffs’ Congressional Redistricting Plan complies with this principle, as the Proposed Congressional Districts are composed of many intact counties and cities. (*See infra* Section F (describing counties and cities that were preserved).) As both the *Zachmann* and *Hippert* Panels acknowledged, however, some political subdivisions have to be split because otherwise it would not be possible to comply with the redistricting principles that are superior to the political subdivision split requirements (*e.g.*, the ideal population principle). *See Zachman v. Kiffmeyer*, No. C0-01-160 (Minn. Special Redistricting Panel Mar. 19, 2002) (Final Order Adopting Plan) at 4; *Hippert v. Richie*, No. A-11-152 (Minn. Special Redistricting Panel Feb. 21, 2012) (Final Order Adopting Plan) at 11. While it is sometimes possible to avoid a political subdivision split while ensuring that a district’s population does not deviate more than two percent from the idea, that is not always possible. (*See infra* Section F (describing counties and cities that were split in order to comply with the ideal population principle).)

F. Communities of Interest

Communities of people with shared interests will be preserved whenever possible to do so in compliance with the preceding principles. *See Ala. Legis. Black Caucus v. Alabama*, 575 U.S. 254, 272 (2015) (describing respect for “communities defined by actual shared interests” as a traditional redistricting principle”) (quotation omitted); *see also Hippert*, No. A11-0152 (Minn. Spec. Redistricting Panel Nov. 4, 2011) (Order Stating Redistricting Principles and Requirements for Plan Submissions); *Zachman*, No. CO-01-160 (Minn. Special Redistricting Panel Dec. 11, 2011 (Order Stating Redistricting Principles and Requirements for Plan Submissions). For purposes of this principle,

“communities of interest” shall include, but are not limited to, groups of Minnesotans with clearly recognizable similarities of social, geographic, cultural, ethnic, economic, occupations, trade, transportation, or other interests. Additional communities of interests will be considered if persuasively established and if consideration thereof would not violate the preceding principles of applicable law. (Principles Order at 7.) The Corrie Plaintiffs’ Congressional Plan complies with this principle. Below is a district-by-district explanation of how the Corrie Plaintiffs’ Congressional Plan preserves communities of interest.

Congressional District 1

The Corrie Plaintiffs’ Proposed Congressional District 1 encompasses the southeastern portion of Minnesota, with a total population of 713,315 people. It includes the entire counties of Houston, Fillmore, Mower, Freeborn, Waseca, Steele, Dodge, Olmsted, Winona, Le Sueur, Rice, Goodhue, Wabasha. In order to comply with the ideal population requirements, Proposed Congressional District 1 also includes portions of the counties of Scott, Dakota, Nicollet, and Blue Earth.

Notably, this proposed district keeps Latino communities together in the cities of Faribault and Northfield. These growing Latino communities have common issues such as affordable housing, education, employment, and entrepreneurial interests. In addition, Faribault has seven mobile park communities that are populated predominantly by Latinos. It also has one of the lowest high school graduation rates for Latinos in the State. While Faribault has lost close to 7.9 percent of its White population, its 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. Unifying the Latinos in these communities into a

single district would give them a stronger voice in the political process and is called for given their shared values, cultural ties, and economic interests.

Congressional District 2

The Corrie Plaintiffs' Proposed Congressional District 2 encompasses the entire cities of Chanhassen, Eden Prairie, Shakopee, Jackson Township, Prior Lake, Savage, Louisville Township, Burnsville, Eagan, Mendota Heights, West Saint Paul, South Saint Paul, Sunfish Lake, Inver Grove Heights, Saint Paul Park, Grey Cloud Island, Apple Valley, Lakeville, Farmington City, Empire, Coates, Rosemount, and Nininger. It also encompasses the western half of Bloomington and the eastern half of Chaska, as well as parts of the cities of Cottage Grove, Spring Lake (due to the exclaves that fall within Prior Lake, and to satisfy the ideal population principle), Eureka (due to exclaves that fall within Lakeville, as well as to keep the Lakeville Airport within a single district), and Castle Rock (due to exclaves that fall within Farmington). Proposed Congressional District 2 has a total population of 713,312 people.

In addition, this proposed district would unite the Latino communities in Chaska, Jackson, and Shakopee and place them in the same district with the Shakopee Mdewakanton Sioux. It also unites the East African community that resides in the precincts near where Bloomington, Savage, and Burnsville meet.

Congressional District 3

Proposed Congressional District 3 encompasses Hennepin County and parts of Anoka County and Ramsey County, with a total population of 713,311 people. Because

Hennepin County has more than the ideal population of a single congressional district, there are also portions of Hennepin County in Proposed Congressional District 5.

This proposed district keeps the large immigrant and BIPOC population in Brooklyn Park and Brooklyn Center unified. This includes the West African communities of Brooklyn Center and Brooklyn Park that have a large social support network and contribute significantly to the communities economic growth with many African small and medium businesses and services. (*See Declaration of Nelima Sitati Munene.*) These two cities also share a large Hmong community that seeks to remain in the same congressional district.

This proposed district also keeps the growing Tibetan communities in Fridley and New Brighton together with other immigrant suburban cities such as Brooklyn Center and Brooklyn Park. The Tibetan Minnesotan population, which shares language, culture, ethnic identity and economic interests, is now 5,000 strong and continues to grow. (*See Declaration of Ngawang Dolker.*)

Congressional District 4

The Corrie Plaintiffs' Proposed Congressional District 4 encompasses the City of St. Paul and its surrounding communities, with a total population of 713,299 people. Further, it includes more than 92 percent of the population of Ramsey County, covering most of Ramsey County east of, and including, the City of Arden Hills. It also includes three-fourths of the population of Washington County, covering the core of Washington County south of the City of Hugo on the northern border, and includes half of the City of Cottage Grove to the south.

This proposed district keeps together Black/African American communities in St. Paul, such as Rondo and Frogtown. This proposed district also contains the largest Asian American community by population in the state, at 15.2 percent, containing Asian American communities centered around Lake Phelan and north-east St. Paul. Notably, 37.4 percent of the population Proposed Congressional District 4 is communities of color.

Congressional District 5

The Corrie Plaintiffs' Proposed Congressional District 5 is located entirely within Hennepin County. It has a total population of 713,291 people.

This proposed district includes Minneapolis, its nearest suburban cities to the south and west—the cities of New Hope, Crystal, Robbinsdale, Golden Valley, St. Louis Park, Hopkins, Edina, and Richfield, and a portion of St Anthony, which crosses the county border into Ramsey County. The district includes the eastern half of Bloomington that shares interests with Richfield and other similarly situated suburban cities southwest of Minneapolis. It also includes the Minneapolis/St. Paul International Airport.

Latin-American cohorts from East Bloomington and Richfield, in collaboration with HACER and COPAL, expressed a desire to remain with Minneapolis rather than southwestern suburbs of Edina and Eden Prairie, which are placed in the neighboring Proposed Congressional District 2.

Congressional District 6

The Corrie Plaintiffs' Proposed Congressional District 6 encompasses east-central Minnesota and has a total population of 713,334 people. It includes the counties of (from north to south): Morrison; southern portions of Kanebec and Pine; Benton; Isanti; eastern

portions of Stearns that are not included in Proposed CD 71; Sherburne, Chisago, northern portions of Wright County that are not included in Proposed Congressional District 7; and approximately the northeastern two thirds of Anoka County, the northern third of Washington County, and a small portion of Hennepin County encompassing the City of Hanover. This proposed district includes the cities of St. Cloud, Andover, and Ramsey. Finally, and notably, St. Cloud is the largest population center in Minnesota's central region, with significant representation of the East African Community. By including the entire city of St. Cloud in their Proposed Congressional District 7, the Corrie Plaintiffs preserved this community of interest.

Congressional District 7

The Corrie Plaintiffs' Proposed Congressional District 7 encompasses most of southwestern Minnesota, with a total population of 713,287 people. It includes the whole counties of: (starting from the northwest corner): Wilkin; Grant; Traverse; Douglas; Todd; Stevens; Pope; Big Stone; Swift; Kandiyohi; Meeker; Lac qui Parle; Chippewa; Upper Sioux; Renville; McLeod; Lincoln; Lyon; Redwood; Brown; Pipestone; Murray; Cottonwood; Watonwan; Rock; Nobles; Jackson; Martin; and Faribault. Additionally, it includes the western three fourths of Stearns County, the southern half of Wright County, most of Carver County (other than a slice on the eastern border), the majority of Nicollet County (other than the southeastern corner), and the eastern third and southern fourth of Blue Earth County. Proposed Congressional District 7 also includes the Lower Sioux Indian Community and Upper Sioux Tribal Indian Community Areas.

This proposed district also contains three social service county collaborative entities:

- Southwest Minnesota Health and Human Services (Lincoln, Lyon, Redwood, Pipestone, Murray, and Rock counties);
- Des Moines Valley Health and Human Services (Cottonwood and Jackson counties); and
- Health and Human Services of Faribault and Martin Counties.

The boundaries of this proposed district are supported by Declarant Jovita Francisco, executive director of Minnesota Immigrant Movement (MIM). (*See* Declaration of Jovita Francisco (“Francisco Declaration”).) The proposed district also unites the cities of Worthington, St. James, and Madelia, which have some of the largest Latino populations that are bound by cultural ties, language and economic issues. (Francisco Declaration ¶3.) The Latino/Hispanic community in this region share similar concerns, including affordable housing, education, economic development, workplace safety issues and transportation. (Francisco Declaration ¶8).

Further, the area encompassed by Proposed Congressional District 7 has experienced a significant growth in foreign-born population since 2010. (*See* Cameron Macht, *Changing Faces in Southwest Minnesota*, available at: <https://mn.gov/deed/newscenter/publications/review/march-2018/changing-faces-southwest.jsp>.) Of the foreign-born population in southwest Minnesota, over half (approximately 8,951) are from Latin American countries, including a substantial number of immigrants from Mexico, Guatemala, El Salvador, and Honduras. (Francisco Declaration ¶7.) By holding the Latino/Hispanic population in the region in a single congressional district, Proposed Congressional District 7 gives these residents a chance to

have their issues addressed by more responsive representation. In addition, these same communities utilize the social service collaboratives listed above. Thus, it is important that the foreign-born population remain in the same district as the social service collaboratives.

Congressional District 8

The Corrie Plaintiffs' Proposed Congressional District 8 encompasses all of Northern Minnesota, with a total population of 713,341. It includes the whole counties of: (starting from the northwest corner) Kittson; Roseau; Marshall; Polk; Pennington; Red Lake; Beltrami; Lake of the Woods; Koochiching; Itasca; St. Louis; Lake; Cook; Norman; Mahnomen; Clearwater; Becker; Hubbard; Cass; Aitkin; and Carlton. To comply with the ideal population principle, the Proposed Congressional District 8 includes northern portions of Clay, Otter Tail, Todd, and Mille Lacs, Kanabec, and Pine Counties.

Further, and notably, this proposed district the three largest American Indian reservations in the state (Red Lake Nation, White Earth Nation, and Leech Lake Band of Ojibwe), as well as four other tribal reservations (such as Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, and Mille Lacs Band of Ojibwe, Grand Portage Band of Lake Superior Chippewa) and trust lands. (*See* Declaration of Lenny Fineday.)

(*See also* Erickson Cong. Declaration Ex. G (“Community of Interest Report”).)

G. Compactness

As a factor subordinate to all other redistricting, districts should be reasonably compact. *See Miller v. Johnson*, 515 U.S. 900, 916 (1995); *Brown v. Thomson*, 462 U.S. 835, 842 (1983). (Principles Order at 7.) The Corrie Plaintiffs' congressional plan

complies with this principle. (*See* Erickson Cong. Declaration Ex. F (“Compactness Report”).)

H. Purpose or Effect of Protecting, Promoting, or Defeating Incumbents, Candidates, or Political Parties.

Districts must not be drawn with the purpose of protecting, promoting, or defeating any incumbent, candidate, or political party. The panel will not draw districts based on the residence of incumbent officeholders and will not consider past election results when drawing districts. (Principles Order at 8.) The Corrie Plaintiffs’ Congressional Redistricting Plan complies with this principle because it was drawn in order to comply with the redistricting principles discussed above and in a neutral manner as to incumbents, candidates, and political parties.

V. Conclusion

For the foregoing reasons, the Corrie Plaintiffs respectfully request that this Panel adopt the Corrie Plaintiffs’ Congressional Redistricting Plan.

LATHROP GPM LLP

Dated: December 7, 2021

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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

**CORRIE PLAINTIFFS'
MEMORANDUM IN SUPPORT OF
LEGISLATIVE 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. Introduction

The Corrie Plaintiffs intervened in this action to ensure historically underrepresented Black, Indigenous, and Persons of Color (“BIPOC”) communities throughout Minnesota would be separately and adequately represented in the process by which Minnesota’s congressional and legislative districts are redrawn. With the help of BIPOC community members and coalition partners -throughout the state, the Corrie Plaintiffs developed the proposed Legislative Redistricting Plan¹ that is submitted with and further supported by this memorandum and accompanying declarations and reports.

¹ The Corrie Plaintiffs Proposed Legislative Maps are attached as Exhibits H through N to the Declaration of Amy Erickson in Support of the Corrie Plaintiffs’ Legislative Redistricting Plain.

The Corrie Plaintiffs’ redistricting plans were uniquely developed through a nonpartisan, grassroots campaign designed to maximize the participation of BIPOC communities in the 2020 Census process, and to then amplify their voices in this redistricting process. Because these communities are the fastest growing communities in the state, and because they continue to bear the brunt of discriminatory initiatives that would restrict voting and other legal rights, the Panel should pay particular attention to the plan the Corrie Plaintiffs developed with interests of BIPOC communities at the center.

The Panel has already expressed a commitment to preserving communities of people with shared interests “whenever possible to do so” in compliance with other redistricting principles. (*See* Order Stating Preliminary Conclusions, Redistricting Principles, and Requirements for Plan Submissions at 7, Nov. 19, 2021 (hereinafter, the “Principles Order”).) The Corrie Plaintiffs’ Legislative Redistricting Plan does exactly that—preserving BIPOC and other historically underserved communities whenever possible and consistent with other redistricting principles, in an effort to make government responsive to their shared interests.

II. Grassroots Origin of Plan

The Corrie Plaintiffs’ Redistricting Plan (a/k/a the “Unity Map”) was developed as part of the Our Maps MN Campaign—a nonpartisan, grassroots campaign committed to a community-focused, accessible, and transparent redistricting process. (*See generally* Declarations of May Yang (“Yang Declaration”) and Annastacia Belladonna-Carrera (“Carrera Declaration”).) The Unity Map is a natural extension of work done in connection with the 2020 Census by the Minnesota Census Mobilization Partnership (“Census

Partnership”), which created 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. (*Id.*) The Census Partnership was particularly focused on securing and organizing resources to ensure full participation in the 2020 Census by historically undercounted BIPOC communities throughout Minnesota. (*Id.*) 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. (*Id.*)

Following the Census Partnership’s unprecedented effort to ensure historically undercounted communities were counted during the 2020 Census, the Our Maps MN Campaign turned its attention to making sure these same communities were fairly represented in the redistricting process. (*Id.*) In 2021, the Campaign worked diligently to engage Minnesota’s BIPOC communities, and other historically underrepresented communities, in the redistricting process, in order to ensure the redistricting plans ultimately adopted reflect the input of these communities. (*Id.*) As part of the Campaign, the Minnesota Council on Foundations (“MCF”) partnered with 12 BIPOC-led and serving organizations in a coordinated effort to develop community of interest maps across the State. (Yang Declaration ¶ 7.) In addition to MCF, the organizations that participated in this effort include: African Career, Education & Resources, Inc.; Anika Foundation; Asian American Organizing Project; CAPI USA; Communities Organizing Latinx Power and Action (“COPAL MN”); Deaf Equity; Hispanic Advocacy and Community Empowerment

through Research (“HACER”); Islamic Civic Society of America; Native American Community Development Institute; Pillsbury United Communities; The Council on American-Islamic Relations (“CAIR”); and Voices for Racial Justice (collectively, the “Unity Cohort”). (*Id.*) As part of the Campaign, Common Cause also partnered with trusted local community leaders and organizations like UNIDOS and the Minnesota Immigrant Movement, who have been working with Indigenous and communities of color with longstanding local networks in greater Minnesota—in locations like Faribault, Northfield, Rochester, Worthington, Madelia, St. James, Chaska, Shakopee, and Mankato, just to name a few—to raise awareness about the redistricting process, generate interest in mapping sessions, and drive turnout at the Special Redistricting Panel’s public comment session. (Carrera Declaration ¶¶ 5-6.)

During the current redistricting cycle, the Unity Cohort led over 100 hours of training, redistricting education and awareness, community outreach and engagement, listening sessions, and map drawing. (Yang Declaration ¶ 8.) 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 across the state. (*Id.*) Through this engagement, more than 40 “community of interest” maps were developed, based on information shared by community members about their shared experiences. (*Id.*) The Unity Cohort eventually combined the community of interest maps into the statewide Unity Map, which ultimately was incorporated into the Corrie Plaintiffs’ Proposed Redistricting Plan. (*Id.* ¶ 9.) The Unity Cohort met bi-weekly for two-hour mapping sessions with redistricting and geographic information system professionals to help guide

the process. (*Id.*) During each session, time was dedicated to discussing the community of interest maps, population growth, and demographic shifts reflected by 2020 Census, and the impact these changes are having and are expected to have on communities of interest going forward. (*Id.*)

Because a key goal of the Unity Map (incorporated into the Corrie Plaintiffs' Redistricting Plan) was to advance a community-centered redistricting plan, ample time in the sessions was dedicated to participants sharing information about their communities and the elements that shape and bind them together. (*Id.*) 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. (*Id.*) After developing drafts of the Unity Map, Unity Cohort members took their work back to their communities to elicit feedback. (*Id.*) This information was then reported back to the Cohort, and additional changes were made to best reflect community interests in balance with other criteria. (*Id.*) This process continued until the Unity Cohort reached consensus on the district boundaries reflected in the Unity Map. (*Id.*) The Our Maps MN Campaign and the iterative process by which community members and community-led organizations developed the Corrie Plaintiffs' Redistricting Plan 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. The Corrie Plaintiffs' Redistricting Plan was created by the people and for the people—by engaged members of Minnesota's BIPOC and other historically underrepresented communities, 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

in Congress and the Minnesota Legislature more responsive to their interests, the Corrie Plaintiffs ask the Panel to adopt the Corrie Plaintiffs' Proposed Redistricting Plan.

III. Description of the Corrie Plaintiffs' Legislative Redistricting Plan

In proposing their Legislative Redistricting Plan, the Corrie Plaintiffs' primary goals are to ensure that: (1) Minnesota's BIPOC communities have the ability to participate in the political process and elect candidates of their choice; and (2) the rights and interests of communities of interest, and particularly BIPOC communities, are protected. Over the last decade, Minnesota's population growth was driven exclusively by population increases among its diverse BIPOC communities. In fact, from 2010 to 2020, Minnesota's BIPOC communities grew by 454,000 residents—a growth rate of 150 percent. By contrast, during the same period, the state's White non-Hispanic population declined by 51,000 residents. (Brower, Susan, *Minnesota's Demographic and Census Overview for 2020 Redistricting*, Aug. 18, 2021, available at www.house.leg.state.mn.us/comm/docs/C3TfSEuiGkWTnghCkp9IYg.pdf.) Absent this dramatic population growth among Minnesota's BIPOC communities, the state undoubtedly would have lost its 8th Congressional seat. In order to be credible, the redistricting plan adopted by this Panel must account for population growth that continues to be driven by Minnesota's BIPOC communities.

The Corrie Plaintiffs' Legislative Redistricting Plan achieves the Corrie Plaintiffs' goals of protecting the rights and interests of Minnesota's BIPOC communities and preserving communities of interest, thereby giving a voice to Minnesotans who have been historically underrepresented in the Minnesota Legislature. For example, house and senate

districts on St. Paul's East Side were drawn to ensure the area's Southeast Asian community is able to elect candidates of their choice, and boundaries in the Bemidji area were drawn in manner that protects the Ojibwe community's rights and interests. In addition, the Corrie Plaintiffs preserved the Black/African American and diverse communities in North Minneapolis, the Tibetan community in eastern Fridley, New Brighton, southern Moundsview, and St. Anthony, and the Latino/Hispanic community in the Chaska, Jackson, and Shakopee area, such that these communities, each respectively, would be in the same state legislative and congressional districts which, in turn, will better protect their interests.

While the Corrie Plaintiffs' Legislative Redistricting plan keeps communities of interest at the center, the Plan also complies with the other redistricting principles adopted by the Panel in the Principles Order. First, all house and senate districts in the Corrie Plaintiffs Legislative Redistricting Plan have a deviation of less than plus or minus 0.6% from the ideal population. In addition, the Legislative Redistricting Plan reflects districts of convenient, contiguous territory that are reasonably compact, as measured by more than one objective measure. Further, the Legislative Plan preserves the overwhelming majority of political subdivisions and was drawn in a neutral manner as to incumbents, candidates, and political parties.

In short, the Corrie Plaintiffs' Legislative Redistricting Plan complies with all of the redistricting principles adopted by the Panel in the Principles Order. The Corrie Plaintiffs respectfully request that the Panel adopt their Legislative Redistricting Plan.

IV. Compliance with Redistricting Principles

A. Ideal Population

Based on the 2020 Census, the ideal population of a Minnesota state senate district is 85,172; and the ideal population of a Minnesota state house district is 42,586. (Principles Order at 4.) State legislative districts must adhere to the concept of population-based representation. *Reynolds v. Simms*, 377 U.S. 533, 568 (1964); see U.S. Const. Amend. XIV. Some deviation from perfect equality is permissible to accommodate a state's clearly identified, legitimate policy objections. *Reynolds*, 377 U.S. at 579. But a court performing the task of redistricting is held to a higher standard of population equality. *Connor v. Finch*, 431 U.S. 407, 414 (1977). Accordingly, the goal is de minimus deviation from the ideal district population. *Id.* The population of a legislative district must not deviate by more than two percent from the population of the ideal district. *Hippert*, No. A11-0152 (Minn. Special Redistricting Panel Nov. 4, 2011) (Order Stating Redistricting Principles and Requirements for Plan Submissions); *Zachman*, No. CO-01-160 (Minn. Spec. Redistricting Panel Dec. 11, 2001) (Order Stating Redistricting Principles and Requirements for Plan Submissions). This is a maximum deviation, not a level under which all population deviations will be presumed acceptable. (Principles Order at 5-6.)

1. Senate Districts

All the senate districts have a deviation of less than 0.5 percent from the ideal population, well within the range of de minimis deviation from the 2 percent threshold. The most populated senate district has a population of 85,543 (a deviation of 0.44%). The least populated senate district has a population of 84,772 (a deviation of -0.47%). The

difference between the district with the highest population and the lowest population is 0.91%. (*See also* Declaration of Amy Erickson in Support of the Corrie Plaintiffs' Legislative Redistricting Plan ("Erickson Leg. Declaration") Ex. A ("Population Summary Reports".))

2. House Districts

All house districts have a deviation of less than 0.6 percent from the ideal population, well within the range of de minimis deviation from the ideal, and not more than the 2 percent threshold. The most populated house district has a population of 42,836 (a deviation of 0.59%). The least populated house district has a population of 42,359 (a deviation of -0.53%). The difference between the district with the highest population and the lowest population is 1.12%. As such, the Corrie Plaintiffs' Legislative Redistrict Plan complies with the ideal population principle. (*See also* Population Summary Reports.)

B. Minority Voting Rights

Voting districts must not be drawn with the purpose or effect of denying or abridging the voting rights of any United States citizen on account of race, ethnicity, or membership in a language minority group. U.S. Const. Amends. XIV, XV; Voting Rights Act of 1965, 52 U.S.C. 10301(a) (2018). In fact, Districts must be drawn to protect the equal opportunity of racial, ethnic, and language minorities to participate in the political process and elect candidates of their choice, whether alone or in alliance with others. 52 U.S.C. 10301(b) (2018). (Principles Order at 6.) The Corrie Plaintiffs' Legislative Redistricting Plan complies with this principle.

Today, Minnesotans of color are disproportionately represented by elected officials who do not look like them or share their experiences. BIPOC Minnesotans make up nearly 22 percent of the population, but only 12 percent of the Minnesota Legislature. (*Compare* United States Census Bureau, QuickFacts Minnesota, www.census.gov/quickfacts/MN, *with* Becky Z. Dernbach et. al., *In St. Paul, the most diverse Minnesota Legislature ever is just getting started* (Jan. 25, 2021), www.mprnews.org/story/2021/01/25/in-st-paul-the-most-diverse-minnesota-legislature-ever-is-just-getting-started.) In addition, at the Congressional level, Minnesota has elected only two persons of color in the state's history—Keith Ellison and Ilhan Omar—both of whom were elected from Minnesota's 5th Congressional District. Currently, representatives of color make up only 10 percent of Minnesota's Congressional delegation (again, compared with nearly 22 percent of the state's population). (*Compare* Minnesota Members of Congress, <https://mn.gov/portal/government/federal/minnesota-delegation.jsp>, *with* United States Census Bureau, QuickFacts Minnesota, <https://www.census.gov/quickfacts/MN>.)

In light of the disproportionately low representation of BIPOC communities by BIPOC community members, the Corrie Plaintiffs' Legislative Redistricting Plan seeks to improve minority voting rights in Minnesota and address the underrepresentation of BIPOC communities in the Minnesota Legislature. To do so, the Legislative Plan creates house and senate districts that center these communities where possible, including five majority-minority Senate Districts (Districts 56, 58, 61, 64, and 66) and nine majority-minority House Districts (Districts 56A, 56B, 58A, 58B, 61A, 64A, 64B, 66A, and 66B). *See Thornburg v. Gingles*, 478 U.S. 30 ((1986) (holding that a redistricting plan that

apportions minority voters into districts such that white voters would defeat their preferred candidates violates Section 2 of the Voting Rights Act).

In addition, the Corrie Plaintiffs’ Legislative Plan includes 11 senate districts and 26 house districts in which the Minority Voting Age Population exceeds 25 percent, meaning minority voters in those districts can likely play a substantial, if not decisive role, in the electoral process. *See Georgia v. Ashcroft*, 539 U.S. 461, 482 (2003); *see also Bartlett v. Strickland*, 556 U.S. 1, (2009) (defining an “influence district” as a district “in which a minority group can influence the outcome of an election even if its preferred candidate cannot be elected”).

| Senate District | Voting Age Population | Minority Voting Age Population | Minority Voting Age Population as Percentage of Total Voting Age Population |
|------------------------|------------------------------|---------------------------------------|--|
| SD 2 | 63,958 | 16,245 | 25.4% |
| SD 14 | 65,854 | 16,503 | 25.1% |
| SD 41 | 65,910 | 21,941 | 33.3% |
| SD 46 | 64,615 | 19,184 | 29.7% |
| SD 50 | 61,353 | 16,167 | 26.4% |
| SD 54 | 68,125 | 17,665 | 25.9% |
| SD 55 | 65,297 | 16,416 | 25.1% |
| SD 57 | 66,488 | 20,897 | 31.4% |
| SD 60 | 76,242 | 28,049 | 36.8% |
| SD 63 | 68,199 | 23,747 | 34.8% |
| SD 67 | 85,188 | 64,686 | 35.4% |

| House District | Voting Age Population | Minority Voting Age Population | Minority Voting Age Population as Percentage of Total Voting Age Population |
|-----------------------|------------------------------|---------------------------------------|--|
|-----------------------|------------------------------|---------------------------------------|--|

| | | | |
|---------------|--------|--------|-------|
| HD 02B | 31,239 | 12,719 | 40.7% |
| HD 03A | 35,004 | 11,904 | 34.0% |
| HD 14A | 32,309 | 10,885 | 33.7% |
| HD 22A | 31,618 | 7,923 | 25.1% |
| HD 28B | 33,154 | 10,321 | 31.1% |
| HD 35A | 33,031 | 9,487 | 28.7% |
| HD 40A | 33,776 | 8,620 | 25.5% |
| HD 41A | 32,837 | 12,540 | 38.2% |
| HD 41B | 33,073 | 9,403 | 28.4% |
| HD 46A | 32,649 | 11,124 | 34.1% |
| HD 46B | 31,966 | 8,062 | 25.2% |
| HD 47B | 35,473 | 9,478 | 26.7% |
| HD 48A | 32,717 | 9,347 | 28.6% |
| HD 50A | 31,285 | 10,837 | 34.6% |
| HD 53B | 29,608 | 8,071 | 27.3% |
| HD 54A | 33,391 | 10,491 | 31.4% |
| HD 55B | 32,378 | 10,196 | 31.5% |
| HD 57A | 32,888 | 10,962 | 33.3% |
| HD 57B | 33,600 | 9,936 | 29.6% |
| HD 60A | 38,346 | 16,565 | 43.2% |
| HD 60B | 37,896 | 11,486 | 30.3% |
| HD 61B | 32,604 | 14,473 | 44.4% |
| HD 63A | 33,060 | 19,360 | 41.4% |
| HD 63B | 35,139 | 10,046 | 28.6% |
| HD 67A | 32,440 | 11,652 | 35.9% |
| HD 67B | 32,246 | 11,238 | 34.9% |

In short, the Corrie Plaintiffs’ Legislative Redistricting Plan complies with the Minority Voting Rights principle by creating a significant number of senate and house districts in which minority voters can participate in the political process and elect candidates of their choice, either alone or in coalition with others. (*See also* Erickson Leg. Decl. Ex. E (“Minority Voting-Age Population Reports”).)

C. American Indian Tribes

The reservation lands of a federally recognized American Indian tribe will be preserved and must not be divided more than necessary to meet constitutional requirements. *See Michigan v. Bay Mills Indian Cmty.*, 572 U.S. 782, 788 (2014) (discussing sovereignty of recognized American Indian tribes). Placing discontinuous portions of reservations in separate districts does not constitute a division. (Principles Order at 6.) The Corrie Plaintiffs’ Legislative Plan complies with this principle because it does not divide any federally recognized American Indian reservation land. Further, the Corrie Plaintiffs’ Legislative Plan unites the three largest Ojibwe reservations into one district, HD 2B, creating the first opportunity district for the American Indian/Native American populations in the area.

D. Convenient, Contiguous Districts

Districts must consist of convenient, contiguous territory. Principles Order at 6-7; Minn. Const. art. IV 3; Minn. Stat. 2.91, subd. 2 (2020). Contiguity by water is sufficient if the body of water does not pose a series obstacle to travel within the district. Districts with areas that connect only at a single point will not be considered contiguous. The Corrie Plaintiffs’ Legislative Plan complies with this principle. (*See* Erickson Decl. Ex. C (“Contiguity Reports”).).

E. Political Subdivisions

Political subdivisions must not be divided more than necessary to meet constitutional requirements. Minn. Stat. 2.91, subd. 2; *see also Karcher v. Dagget*, 462 U.S. 725, 740-41 (1983); *Reynolds*, 377 U.S. at 580-81. (Principles Order at 7.) The Corrie Plaintiffs' Legislative Redistricting Plan complies with this principle, as many of the new districts are composed entirely of intact political subdivisions. For example, Senate District 2 includes four intact counties and Senate District 4 includes two entire counties. Likewise, House District 1A consist of four intact counties and House District 10B includes four intact counties. Further, many cities were placed entirely within a house district, including Rosemount in House District 39A, Stillwater in House District 36B, Oakdale in House District 41B, Anoka in House District 33B, Champlin in House District 31B.

As both the *Zachmann* and *Hippert* Panels acknowledged, however, some political subdivisions have to be split because otherwise it would not be possible to comply with the redistricting principles that are superior to the political subdivision split requirements (*e.g.*, the ideal population principle). *See Zachman v. Kiffmeyer*, No. C0-01-160 (Minn. Special Redistricting Panel Mar. 19, 2002) (Final Order Adopting Plan) at 4; *Hippert v. Richie*, No. A-11-152 (Minn. Special Redistricting Panel Feb. 21, 2012) (Final Order Adopting Plan) at 11. While it is sometimes possible to avoid a political subdivision split while ensuring that a district's population does not deviate more than two percent from the idea, that is not always possible. For example, the cities of Bemidji, Faribault, Coon Rapids, Blaine, Shakopee, Savage, Richfield, Shorewood, Crystal, Red Wing, Mankato, St. Michael, Hibbing, Ramsey, Waconia, and Roseville were split across two house districts to avoid a

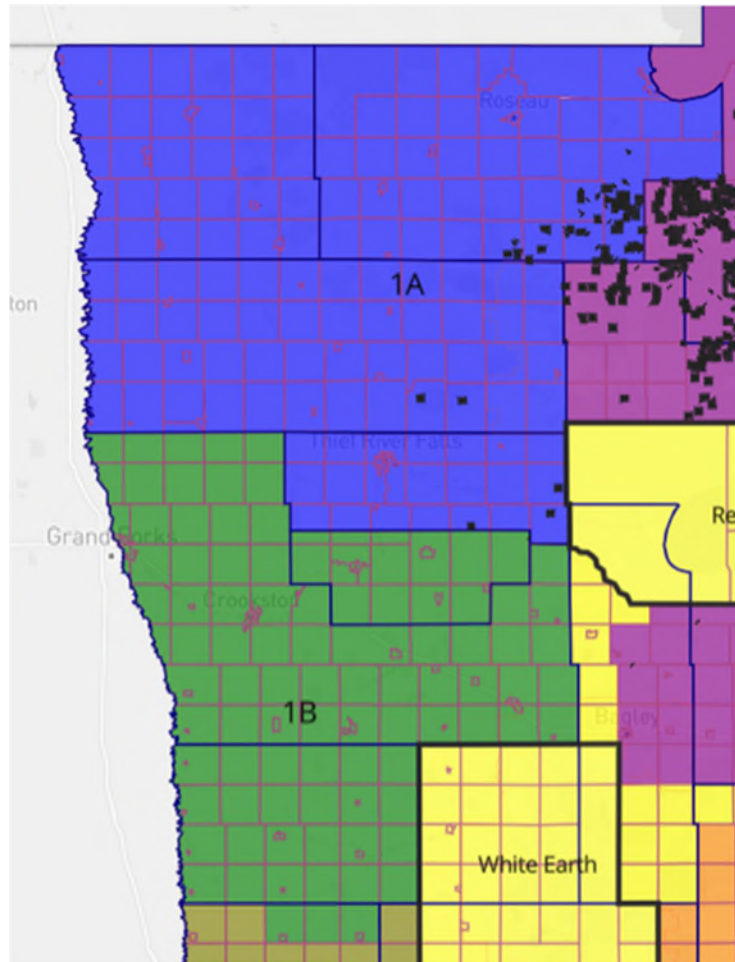
greatly overpopulated house district. In each of these cases, however, the Corrie Plaintiffs united the city in the same senate district. (*See also* Erickson Decl. Ex. D (“[Political Subdivisions Splits Reports”]; *see also* Population Summary Reports).

F. Communities of Interest

Communities of people with shared interests will be preserved whenever possible to do so in compliance with the preceding principles. *See Ala. Legis. Black/African American Caucus v. Alabama*, 575 U.S. 254, 272 (2015) (describing respect for “communities defined by actual shared interests” as a traditional redistricting principle”) (quotation omitted); *see also Hippert*, No. A11-0152 (Minn. Spec. Redistricting Panel Nov. 4, 2011) (Order Stating Redistricting Principles and Requirements for Plan Submissions); *Zachman*, No. CO-01-160 (Minn. Special Redistricting Panel Dec. 11, 2011 (Order Stating Redistricting Principles and Requirements for Plan Submissions). For purposes of this principle, “communities of interests” shall include, but are not limited to, groups of Minnesotans with clearly recognizable similarities of social, geographic, cultural, ethnic, economic, occupations, trade, transportation, or other interests. Additional communities of interests will be considered as persuasively established and if consideration thereof would not violate the preceding principles of applicable law. (Principles Order at 7.)

The Corrie Plaintiffs’ Legislative Plan complies with this principle. What follows is a -by-district analysis of the communities preserved by the Corrie Plaintiffs’ Plan.

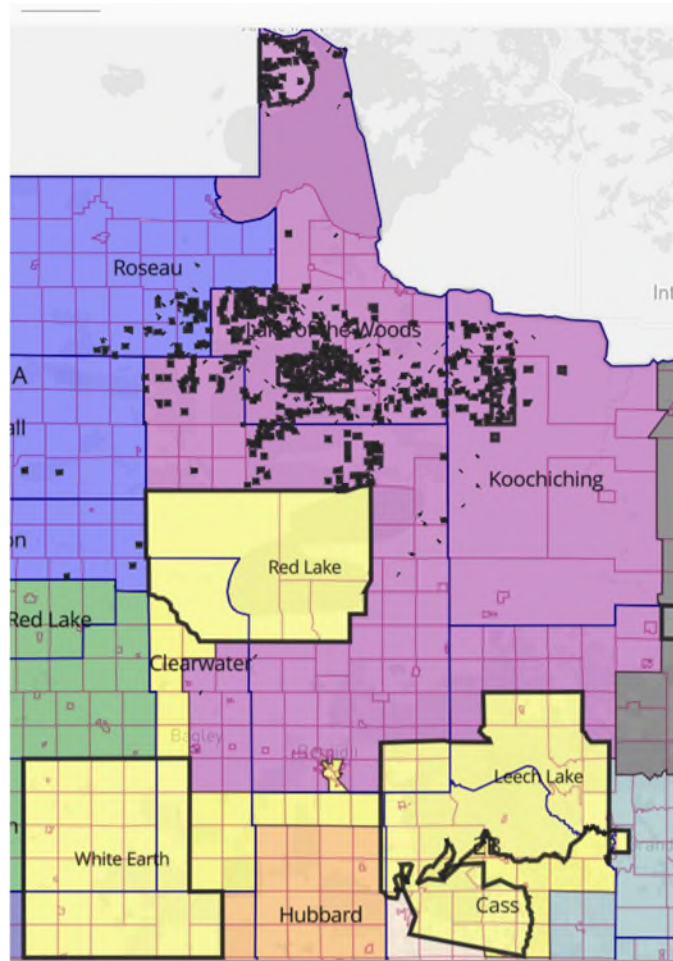
Senate District 1; House Districts 1A (blue) and 1B (green)



Proposed House District 1A has a total population of 42,570 and includes the whole counties of Roseau, Kittson, Marshall, and Pennington, which form a community of interest in the far northwestern corner of the state. This district does not include the 7 Ojibwe tribal lands in this area, which have differing interests and demographics.

Proposed House District 1B has a total population of 42,605 people and includes the whole counties of Red Lake, Polk, and Norman, which form a similar community of interest.

Senate District 2; House Districts 2A (purple) and 2B (yellow)



Proposed House District 2A has a total population of 42,421 and keeps Ojibwe tribal trust lands together along with all of Lake of the Woods County and parts of the counties of Beltrami, Clearwater, Itasca, Koochiching, and Cass.

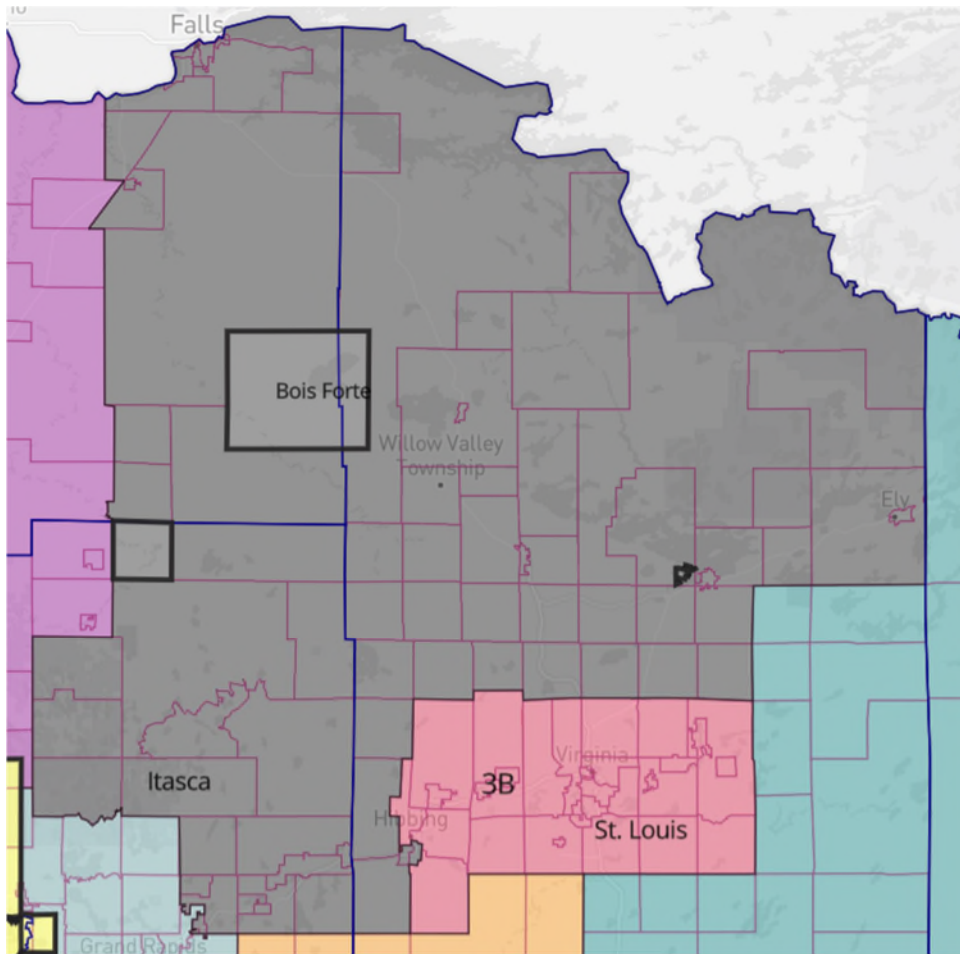
Proposed House District 2B has a total population of 42,724, of which 44.5% identify as American Indian (37.0% of the voting aged population) and 51.9% identify as white. Based on input from local residents, including Lenny Fineday of the Leech Lake Band of Ojibwe and other American Indian community members, House District 2B includes the 3 American Indian reservations with the highest populations (Red Lake Nation, White Earth Nation, and Leech Lake Band of Ojibwe) using a single-precinct

connection line that echoes the exact method used in District 25B that connected Belle Plaine to Northfield in the 2002-2010 district map. (Declaration of Lenny Fineday (“Fineday Declaration”) ¶ 2.) House District 2B also includes large portions of the town of Bemidji, which has elected to its city council members of the White Earth Nation and Red Lake Nation.

The Ojibwe have formed a distinct community within Minnesota for hundreds of generations, with a history of thousands of years on the land, distinct cultural traditions and needs. American Indian leaders have asked that the largest reservation lands be united and that these communities be kept intact to ensure that elected representatives can better serve their needs and interests, including addressing serious housing shortage, physical and mental health problems, education challenges, and high unemployment and underemployment. (Fineday Declaration ¶ 4).

Proposed Senate District 2 includes the whole counties of Lake of the Woods, Beltrami, and Clearwater, and western Koochiching. The Ojibwe reservation areas (White Earth Nation, Red Lake Nation, and Leech Lake Band of Ojibwe) as well as trust lands are united in Senate District 2.

Senate District 3; House Districts 3A (charcoal) and 3B (pink)

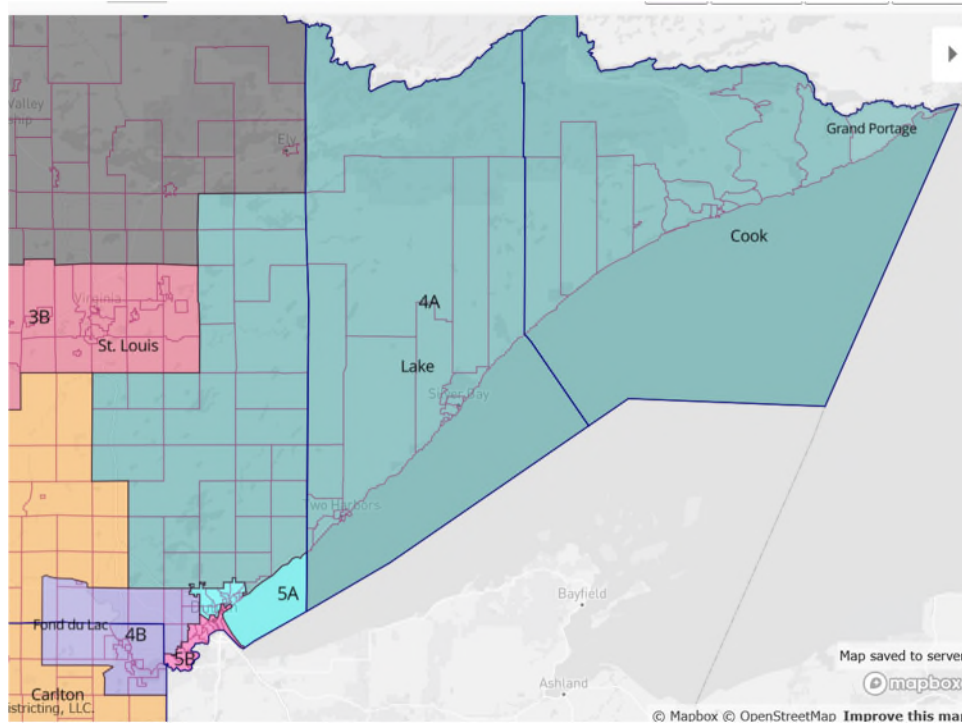


Proposed House District 3A has a total population of 42,733 and combines eastern Koochiching County with the rural northeast corner of Itasca County (a community of interest), and the eastern half of the Mesabi Iron Range that falls within eastern Itasca County starting from Taconite on the west, along with the western part of Hibbing in western St. Louis County. The Bois Forte Band of Ojibwe is located wholly within Proposed House District 3A.

Proposed House District 3B has a total population of 42,618 and combines the remaining part of the St. Louis County section of the Iron Range (eastern Hibbing to Biwabik/Aurora), along with Ely and the remainder of northern St. Louis County.

Most of the Mesabi Iron Range would be located within Proposed Senate District 3.

Senate District 4; House Districts 4A (wintergreen) and 4B (purple)



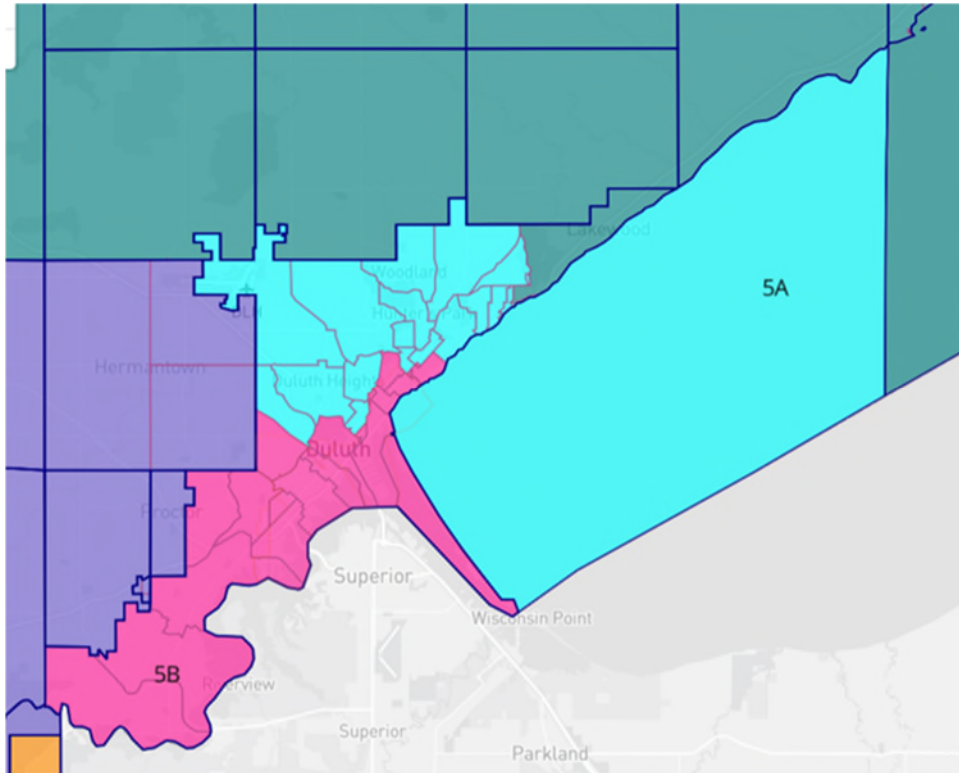
Proposed House District 4A has a total population of 42,501 and combines Cook and Lake Counties with similar tourism-centered portions of southeast St. Louis County, specifically areas that border east Duluth, leaving as much of the Iron Range as possible to House Districts 3A and 3B (see above). Proposed District 4A also contains the Grand Portage Band of Chippewa Indians.

Proposed House District 4B has a total population of 42,815 and contains the remaining non-Duluth part of southeast St. Louis County, including all of the Fond du Lac Band of Ojibwe, Cloquet, Esko, and most of the communities near Fond du lac. A community of interests exists among the residents of Cloquet-Esko-Carlton, along with residents of Scanlon and Wrenshall and the townships of Thomson (Esko), Twin Lakes and Silver Brook. For instance, this community has a strong sense of shared athletics and

education. Cloquet, Esko, and Carlton public schools share Nordic and alpine ski teams, girls swimming, boys wrestling, and boys' soccer. Carlton and Wrenshall schools share a cross country team and football teams. Many students across the community attend school in a district that does not include their residence, thanks to open enrollment. For example, many students living in Cloquet and Carlton attend Esko public schools, and vice versa. This community also shares many outdoor activities. Skiing is popular at Pine Valley Park and Spring Lake trails in Cloquet, and at Jay Cooke State Park. Pine Valley also hosts mountain biking, hiking, and two ice arenas. People enjoy running, biking, and snowmobiling on the Munger trail running through the community. The Cloquet-Esko-Carlton area is also proud of its small businesses including but not limited to Gordy's Hi-Hat and Warming House, Magnolia Cafe, and Mike's Cafe and Pizzeria.

Proposed Senate District 4 connects Cook and Lake Counties with the communities along the Highway 61 corridor in southeast St Louis County that share a similar economic profile and connectedness to Duluth. Senate District 4 also brings the Fond du Lac Band of Ojibwe and the Grand Portage Band of Chippewa Indians into one district.

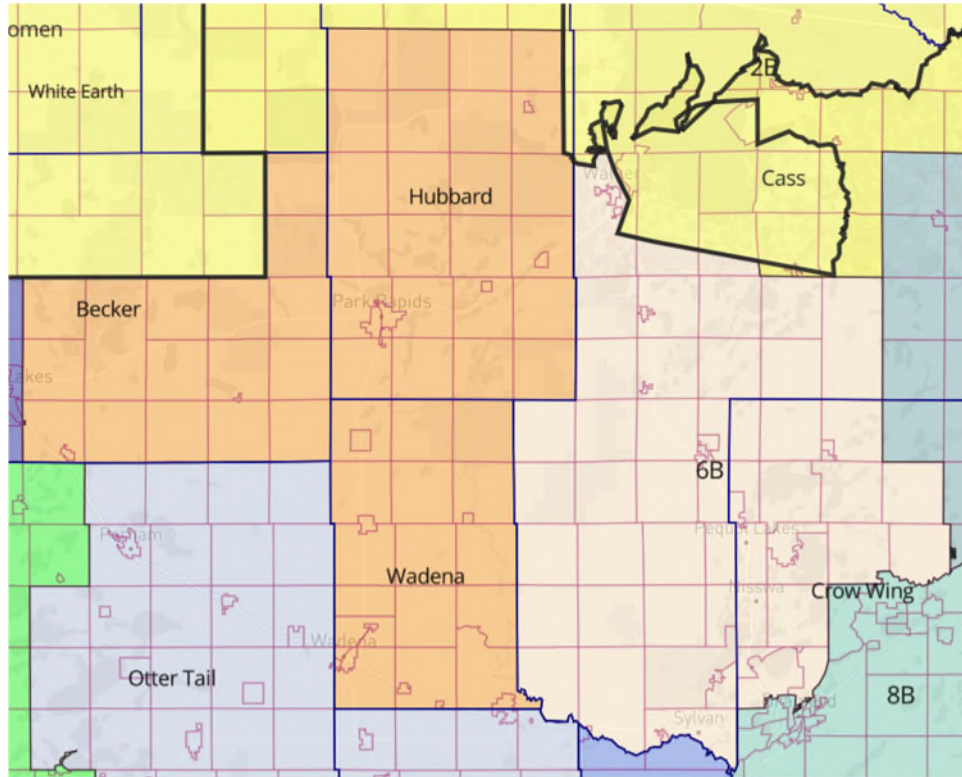
Senate District 5; House Districts 5A (light blue) and 5B (pink)



Proposed House District 5A has a total population of 42,507 people and is comprised of eastern and northern Duluth, including University of Minnesota-Duluth. The University of Minnesota-Duluth has over 10,000 students who hail from all parts of Minnesota, as well as 44 states and 40 countries. The University community has a \$500 million impact on the region each year.

Proposed House District 5B has a total population of 42,614 people and encompasses western and downtown Duluth, including Canal Park.

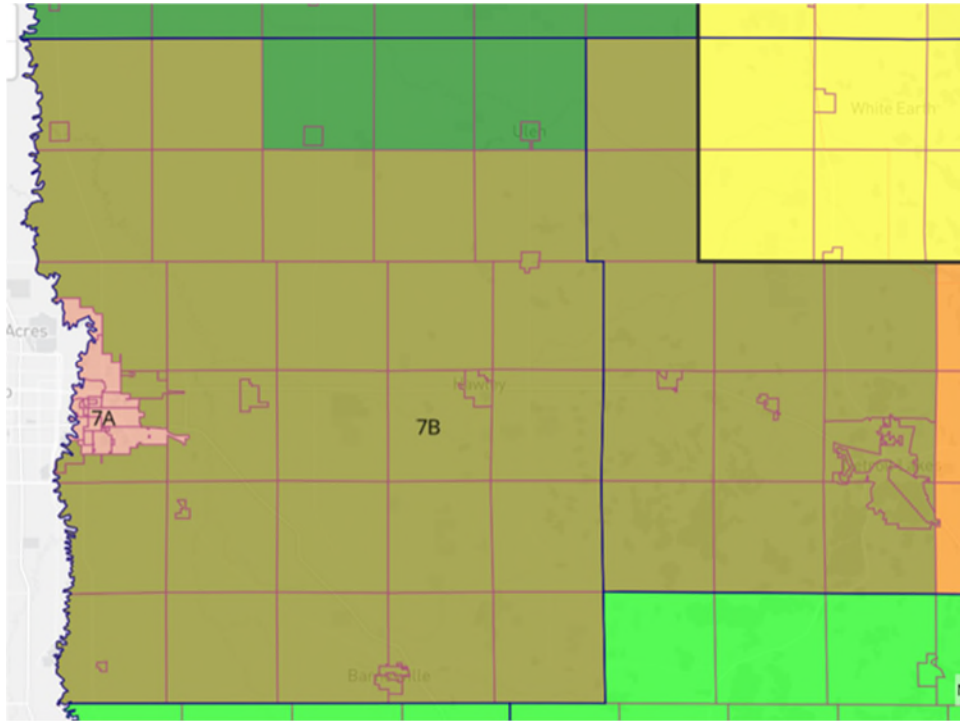
Senate District 6; House Districts 6A (orange) and 6B (beige)



Proposed House District 6A has a total population of 42,579; it centers around Park Rapids and contains all of Wadena County and significant portions of Hubbard and Becker Counties.

Proposed House District 6B has a total population of 42,501 and connects the southern portion of Cass County with the rural northwest section of Crow Wing County and the Brainerd/Baxter exurbs.

Senate District 7; House Districts 7A (pink) and 7B (brown)



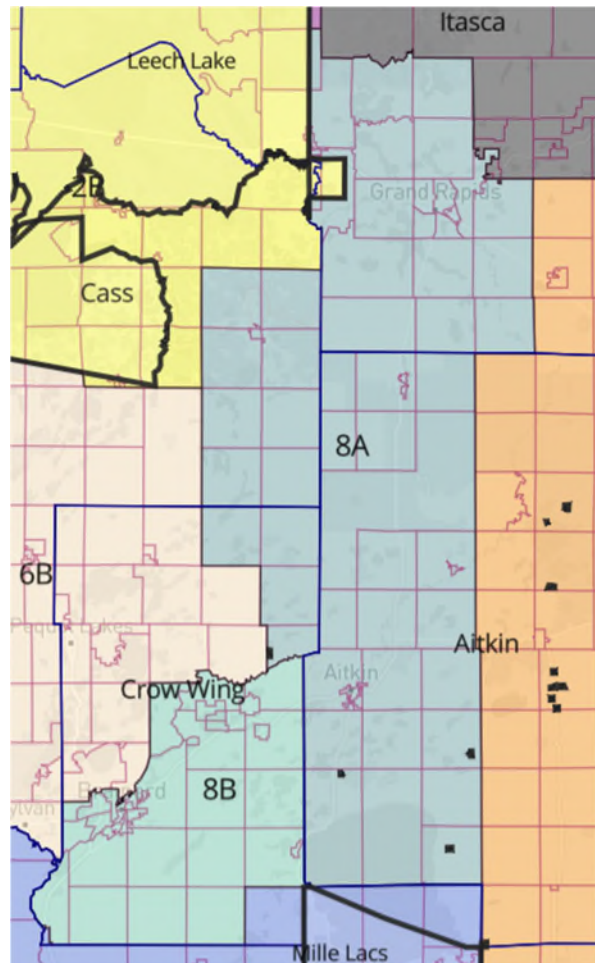
Proposed House District 7A has a total population of 42,403 and is centered on the City of Moorhead, the largest city in northwest Minnesota and the county seat for Clay County. With a population of 44,505 according to the 2020 census, most of the city of Moorhead fits within one House district.

Proposed House District 7B has a total population of 42,599 and is centered on Clay County. It also contains the western portion of Becker County, including the county seat of Detroit Lakes, which draws as many as 13,000 visitors in the summer months, more than doubling the year-round residents. The zip code area of 56549 straddles Clay and Becker counties.

Clay and Becker Counties should be kept in the same house district because they share government resources, such as the Clay/Becker Veteran’s Treatment Court and the

Clay/Becker Treatment Court which includes the recently merged courts for Veteran’s Treatment, Drug Treatment, and the White Earth Nation DWI Court. The shared commitment to rehabilitation and wrap-around services of both Clay and Becker Counties has led to shared investments in staffing, coordination of services, and a remarkably low recidivism rate. (See Nathan Bowe, *Drug Court and Veterans Court merge into Clay-Becker Treatment Court*, DETROIT LAKES TRIBUNE (May 29, 2021), available at <https://www.dl-online.com/news/crime-and-courts/7048218-Drug-Court-and-Veterans-Court-merge-into-Clay-Becker-Treatment-Court>.)

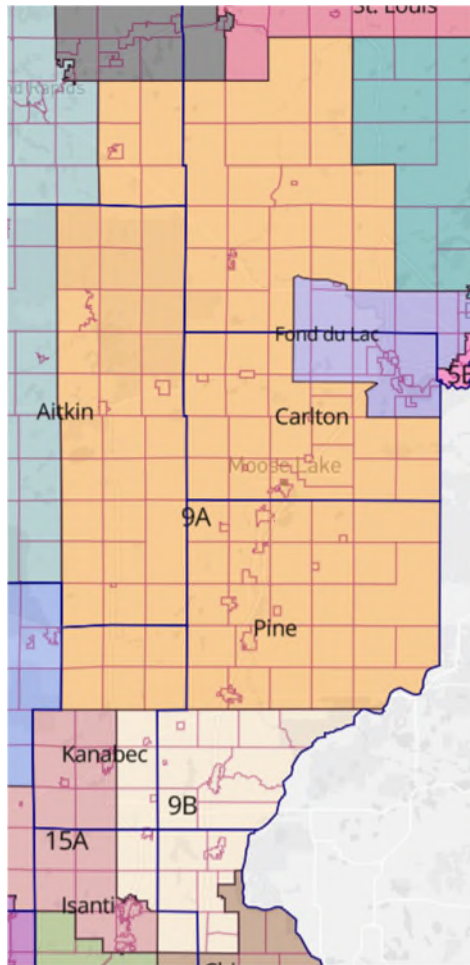
Senate District 8; House Districts 8A (teal) and 8B (lighter teal)



Proposed House District 8A has a total population of 42,572 and encompasses Grand Rapids and the western edge of the Mesabi Iron Range in southwest Itasca County, western Aitkin County, and northeastern Crow Wing County.

Proposed House District 8B has a total population of 42,382 and includes Brainerd, Baxter, and the lakes country of southern Crow Wing County.

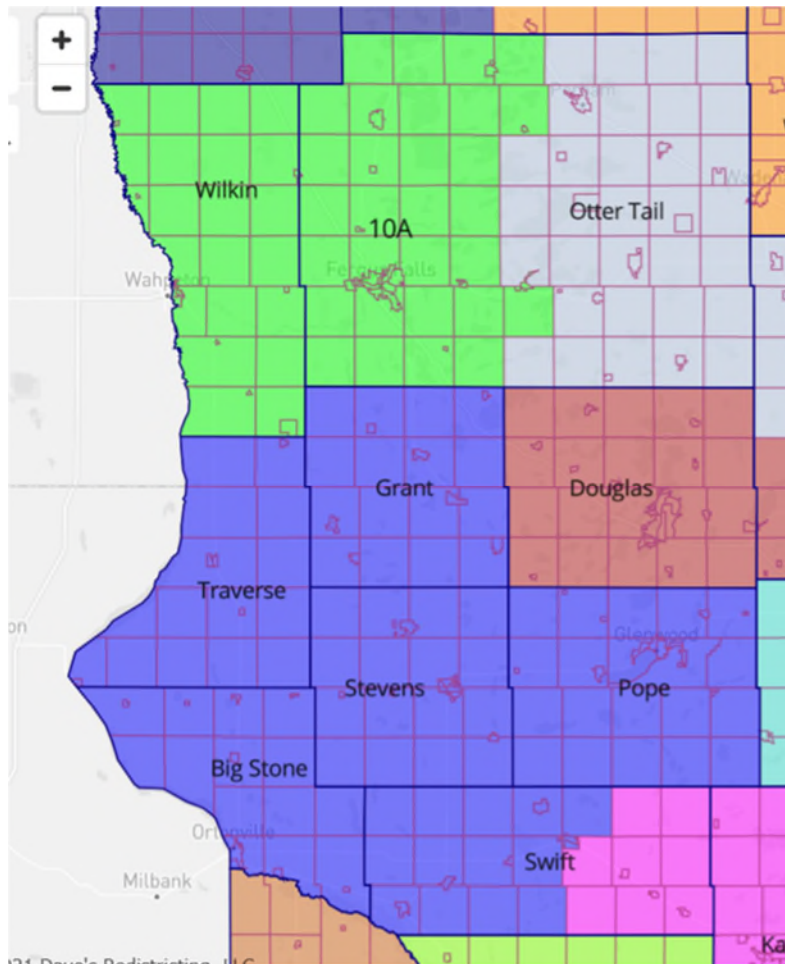
Senate District 9; House Districts 9A (orange) and 9B (beige)



Proposed House District 9A has a total population of 42,630 and is centered around the Northwoods area of northern Pine, southeastern Itasca, southwestern St Louis, eastern Aitkin, and northern Kanabec Counties. This district also includes a large segment of the Cuyuna Iron Range.

Proposed House District 9B has a total population of 42,558 and contains southern Pine County, the rural eastern Kanabec and Isanti Counties, along with a northern slice of Chisago County, including the City of North Branch.

Senate District 10; House Districts 10A (lime green) and 10B (dark blue)

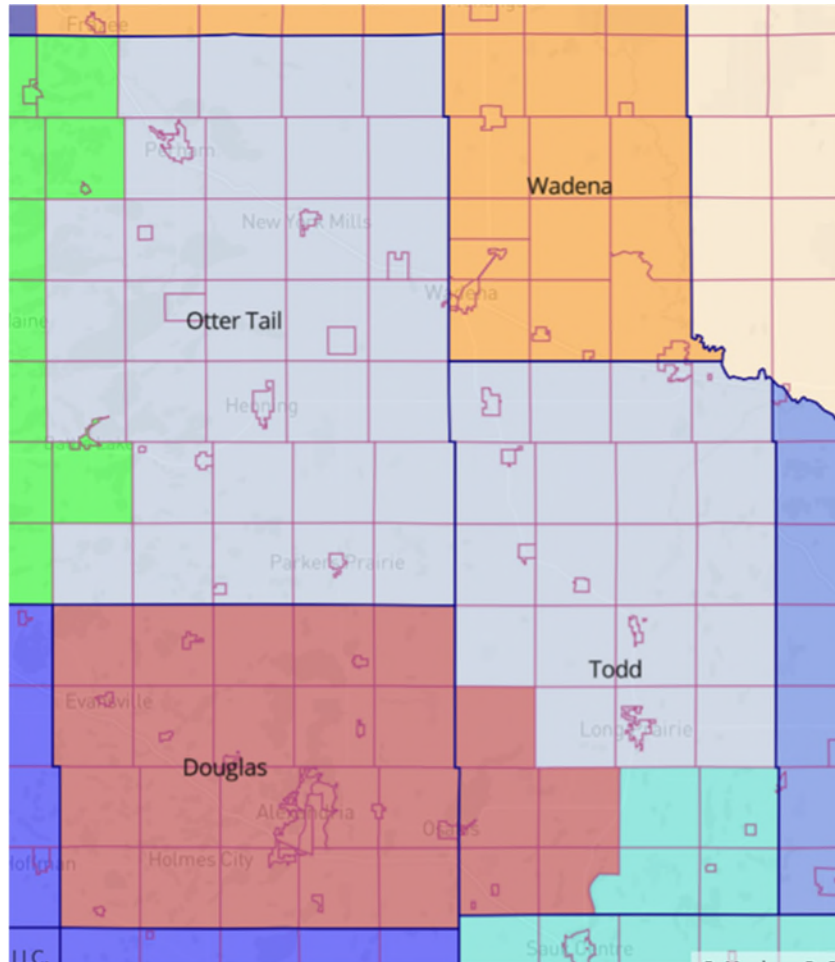


Proposed House District 10A has a total population of 42,448 and contains Wilkin County and the western half of Otter Tail County, including Fergus Falls.

Proposed House District 10B has a total population of 42,501 and combines all of Traverse, Grant, Stevens, Pope, and Big Stone Counties with the western half of Swift County. The district centers on Morris, the county seat of Stevens County. Morris is also home to the University of Minnesota, Morris campus, rated one of the top 10 public liberal

arts colleges. (See University of Minnesota Morris, www.morris.UMN.edu.) Aside from the University, House District 10B is largely rural, and its economy is driven by agribusiness.

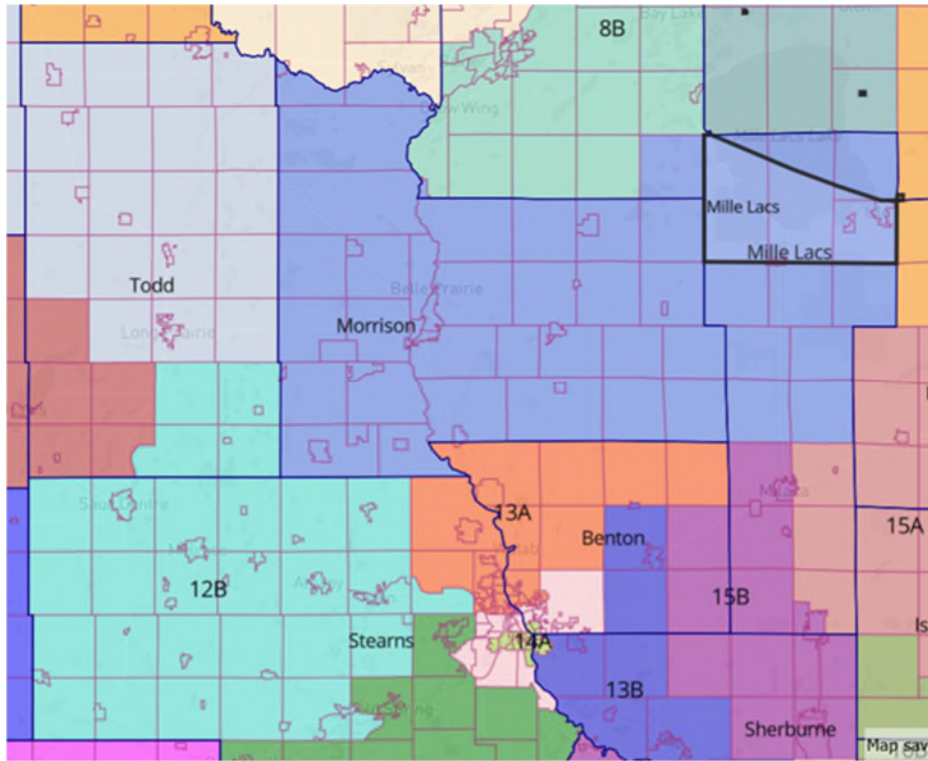
Senate District 11; House Districts 11A (gray) and 11B (maroon)



Proposed House District 11A has a total population of 42,467 and includes the eastern portion of Otter Tail County and northern portion of Todd County. This district is primarily rural. Otter Tail and Todd counties work together on various projects, including a Film Plastic Recycling Program. (See Todd County, Solid Waste, www.co.todd.mn.us/divisions/public-works-services/solid-waste/.)

Proposed House District 11B has a total population of 42,508 and includes all of Douglas County and the southwest portion of Todd County.

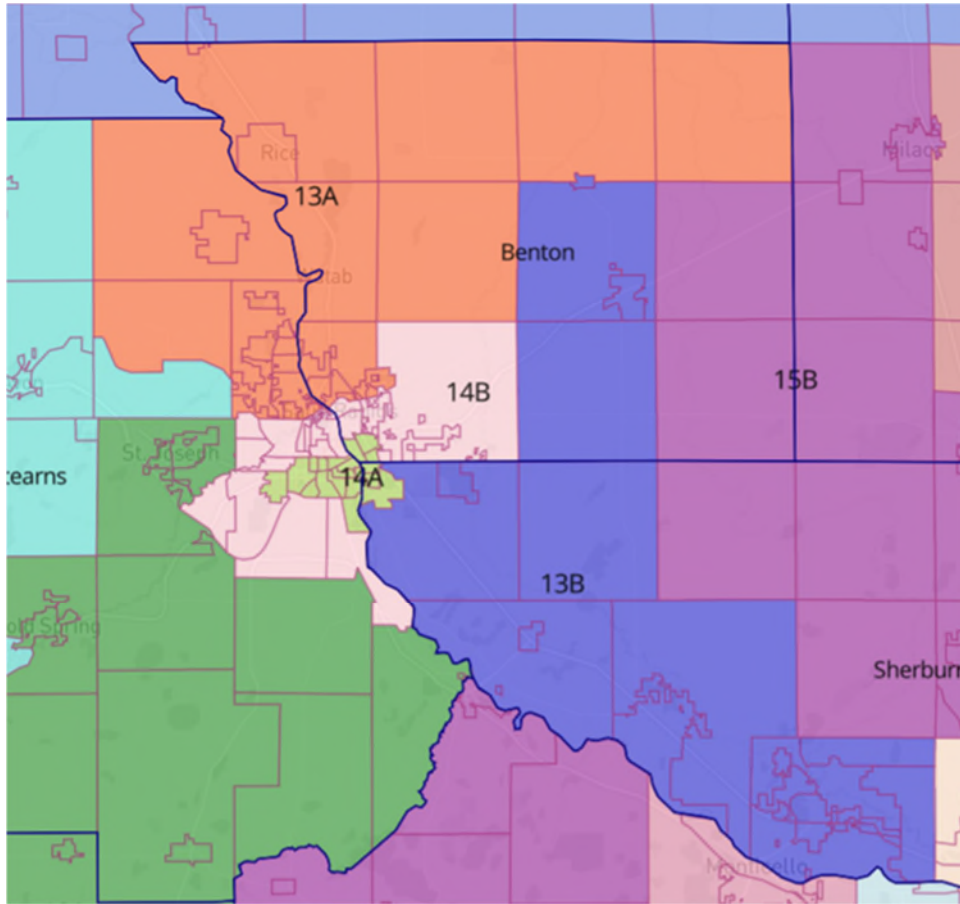
Senate District 12; House Districts 12A (blue) and 12B (turquoise)



Proposed House District 12A has a total population of 42,493 and is comprised of all of Morrison County, a few precincts from Crow Wing County, and the northern half of Mille Lacs County. It includes the entire reservation of the Mille Lacs Band of Ojibwe.

Proposed House District 12B has a total population of 42,810 and is comprised of the exurban and rural portions of Stearns County, along with the southeast corner of Todd County.

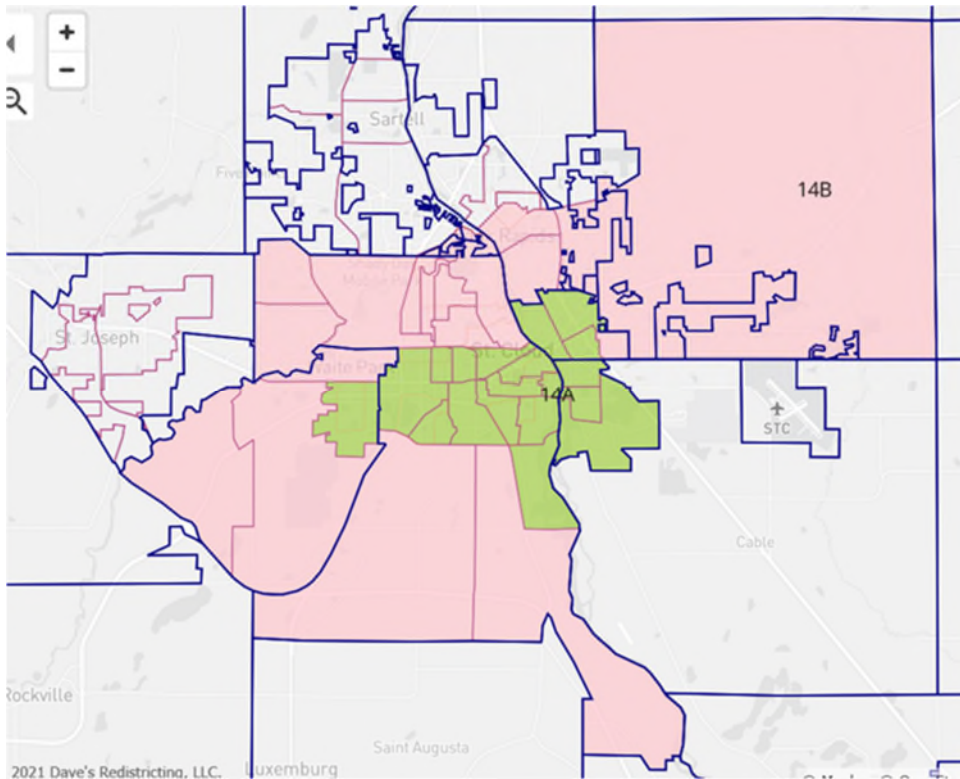
Senate District 13; House District 13A (orange) and 13B (blue)



Proposed House District 13A has a total population of 42,493 and is comprised of Sartell, northern Sauk Rapids, and the neighboring communities to the north where Stearns and Benton Counties meet.

Proposed House District 13B has a total population of 42,485 people and is comprised of eastern Benton County, northwest Sherburne County near St Cloud, and other communities along the Mississippi River, including Big Lake.

Senate District 14; House Districts 14A (green) and 14B (pink)

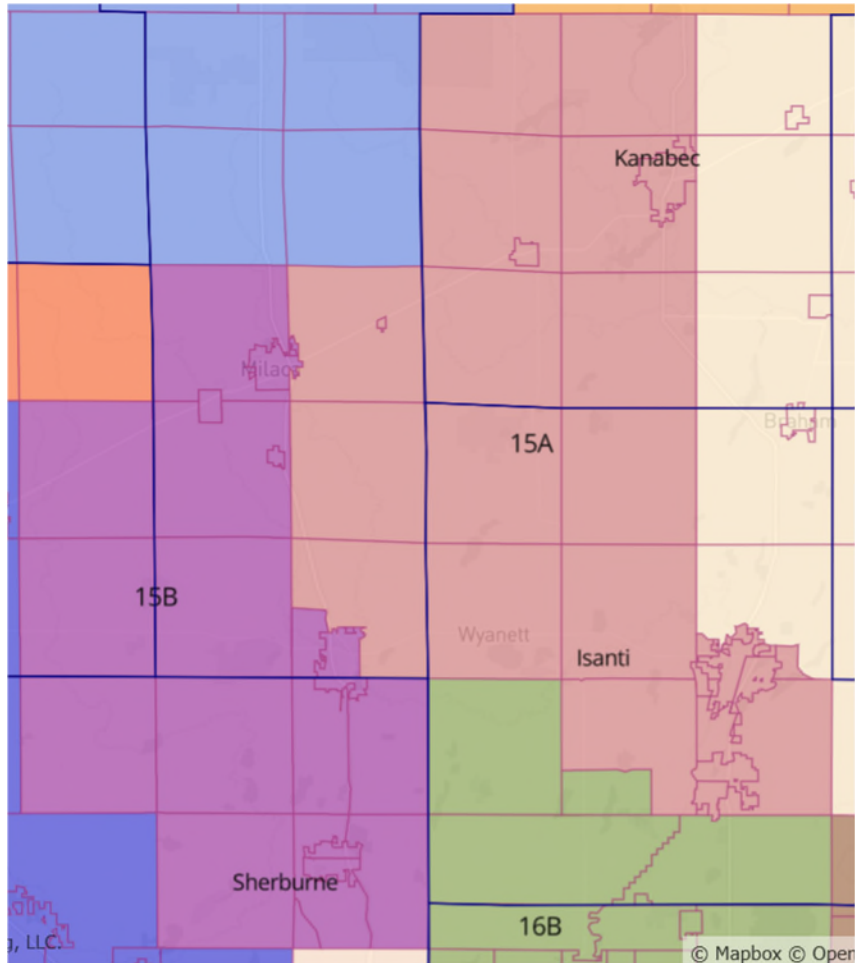


Proposed House District 14A has a total population of 42,648 and connects the most diverse sections of St. Cloud with the most diverse corner of Waite Park, as requested by the representatives of East African community members and input from CAIR-MN. This district has 41.2% BIPOC (33.7% VAP), including 30.6% Black/African American/African American (22.3% VAP).

Proposed House District 14B has a total population of 42,614 and includes the remainder of St. Cloud and Waite Park.

Senate District 14 includes the entire cities of St. Cloud and Waite Park.

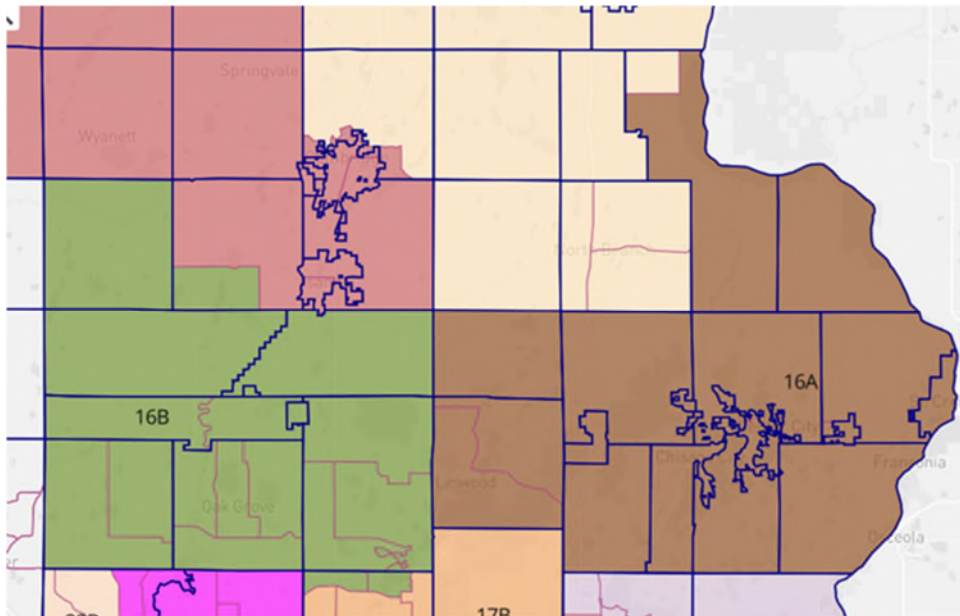
Senate District 15; House Districts 15A (rouge) and 15B (purple)



Proposed House District 15A has a total population of 42,689 and is comprised of southeastern Mille Lacs County and western Kanabec and Isanti Counties. It also includes Cambridge and Isanti City.

Proposed House District 15B has a total population of 42,462 and is centered on Princeton, Milaca, and Zimmerman, and where Sherburne, Mille Lacs, and Benton Counties meet.

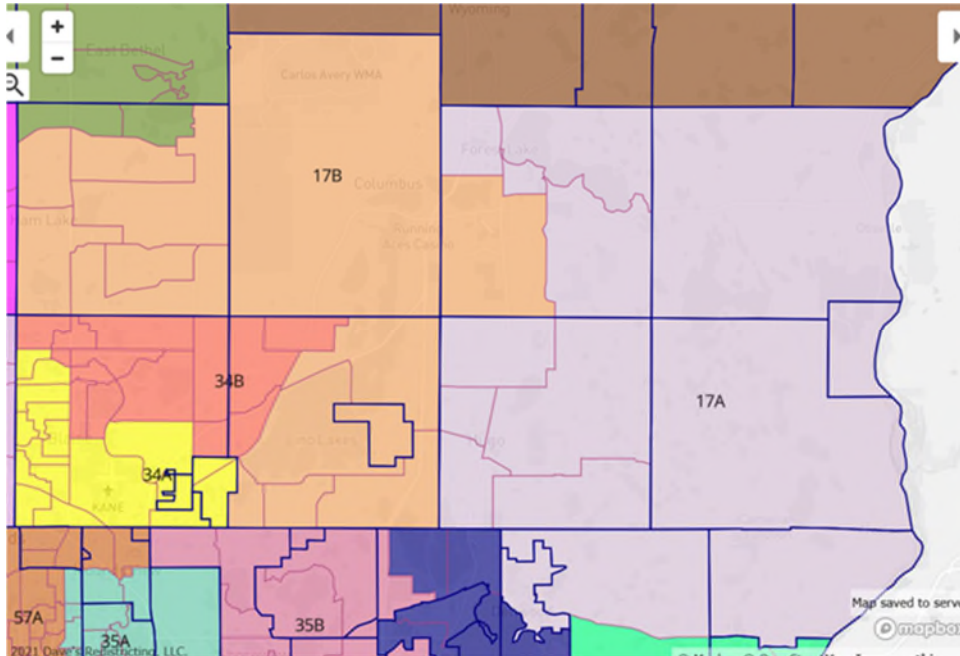
Senate District 16; House Districts 16A (brown) and 16B (green)



Proposed House District 16A has a total population of 42,714 and encompasses the rapidly growing exurbs of north St Paul, the urban areas of Chisago County, and a few townships where Chisago County meets Isanti and Ramsey Counties.

Proposed House District 16B has a total population of 42,374 and has a similar profile, including areas in northern Anoka and southern Isanti Counties, and centering on St Francis city.

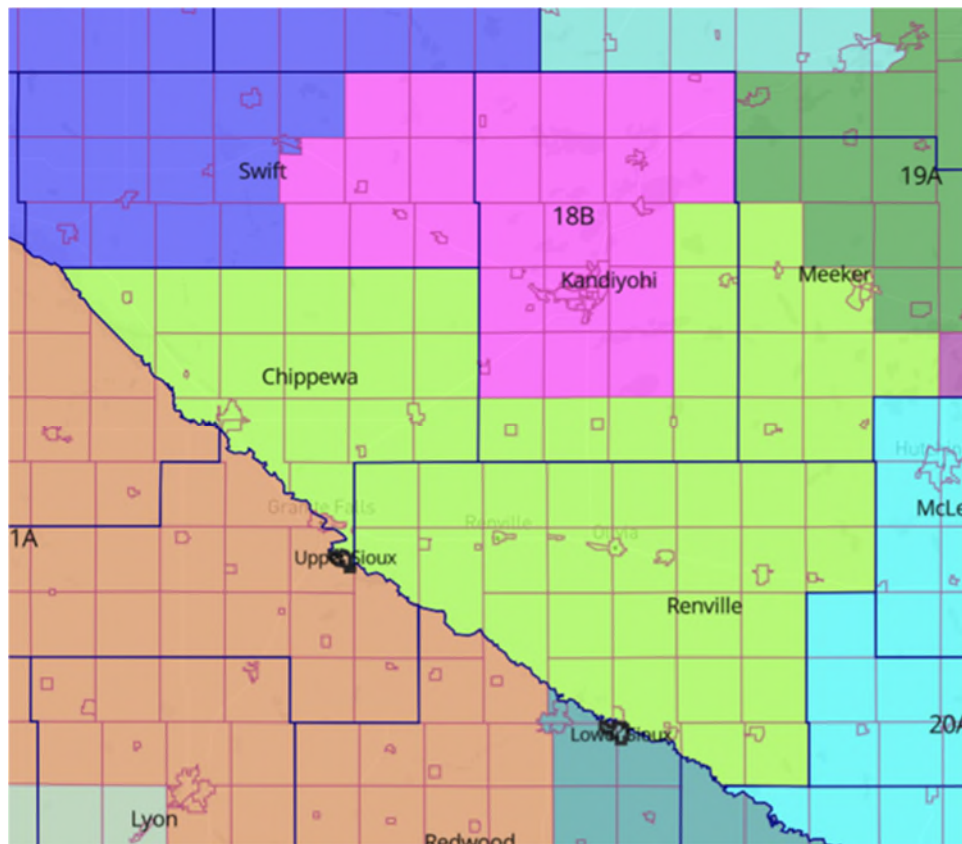
Senate District 17; House Districts 17A (light purple) and 17B (beige)



Proposed House District 17A has a total population of 42,682 and includes northern Washington County, based around Hugo.

Proposed House District 17B has a total population of 42,521 and includes eastern Anoka County, including Ham Lake and Lino Lakes.

Senate District 18; House Districts 18A (light green) and 18B (pink)

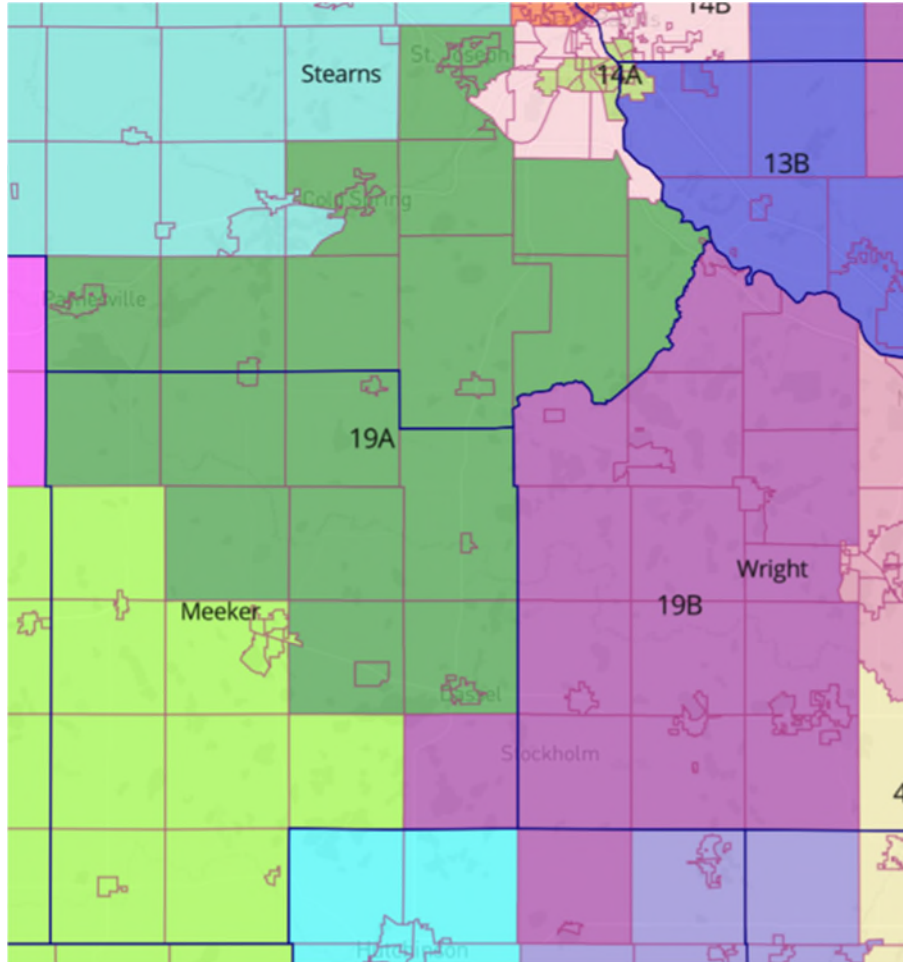


Proposed House District 18A has a total population of 42,524 and is comprised of all of Renville and Chippewa Counties, southwest Meeker County, and the part of Kandiyohi County not in proposed House District 18B.

Proposed House District 18B has a total population of 42,383 and includes portions of Kandiyohi County, including Willmar and eastern Swift County. Willmar and surrounding areas have an estimated ethnic economy of \$190 million. A section of Litchfield Avenue has many ethnic businesses located on and around the avenue, including a mini mall, Midtown Plaza (313 Litchfield Ave). This ethnic community of interest is

held whole in Proposed House District 18B. (Declaration of Dr. Bruce Corrie (“Corrie Declaration”) ¶ 6.)

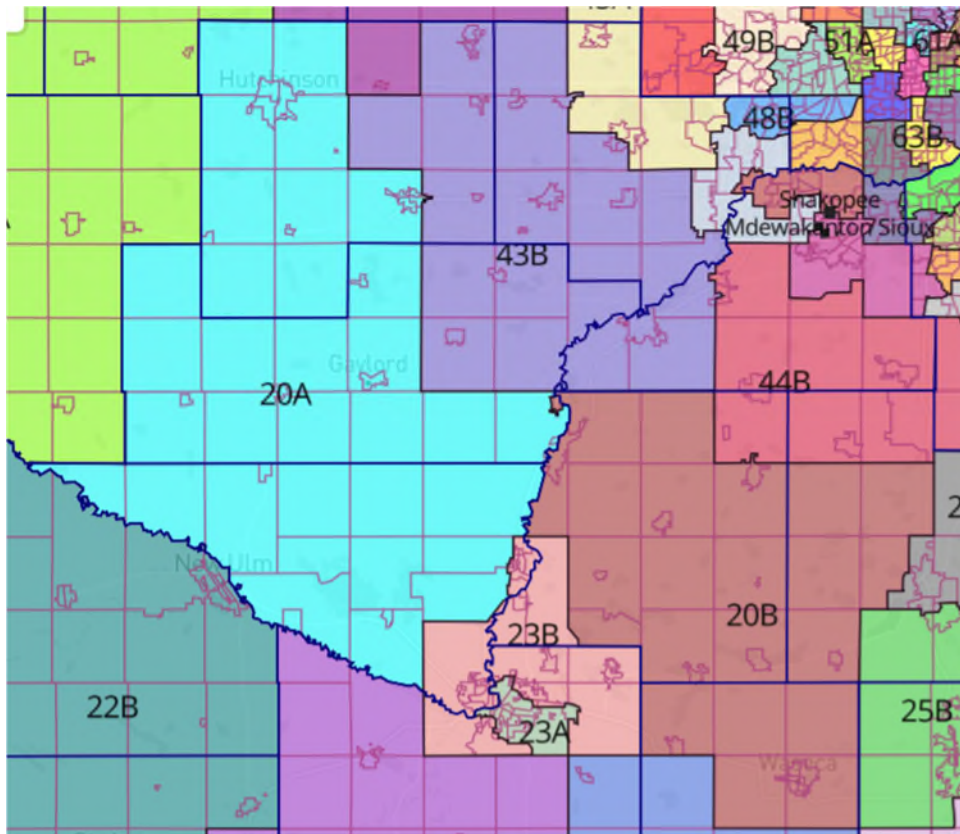
Senate District 19; House Districts 19A (green) and 19B (purple)



Proposed House District 19A has a total population of 42,556 and is comprised of southeast Stearns County, based around Cold Spring and northeast Meeker County.

Proposed House District 19B has a total population of 42,550 and is comprised of western Wright County around Annadale, far southeast Meeker County, and a precinct from McLeod County.

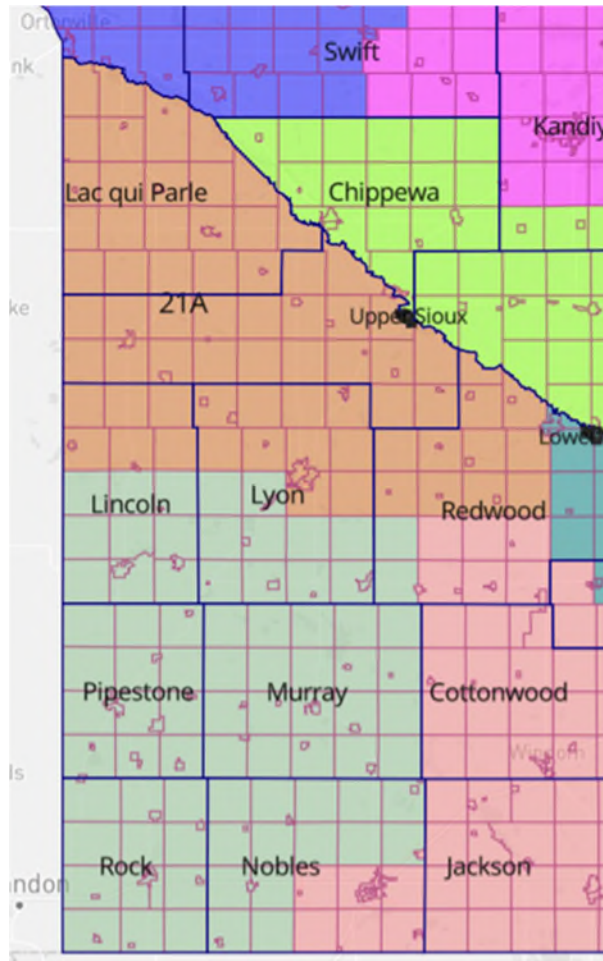
Senate District 20; House Districts 20A (light blue) and 20B (brown)



Proposed House District 20A has a total population of 42,560 and encompasses western McLeod (including Hutchinson) and Sibley Counties, and most of Nicollet County.

Proposed House District 20B has a total population of 42,460 and encompasses most of LeSueur County (including Le Center), western Rice County, and northern Waseca County. The district also includes Henderson from Sibley County.

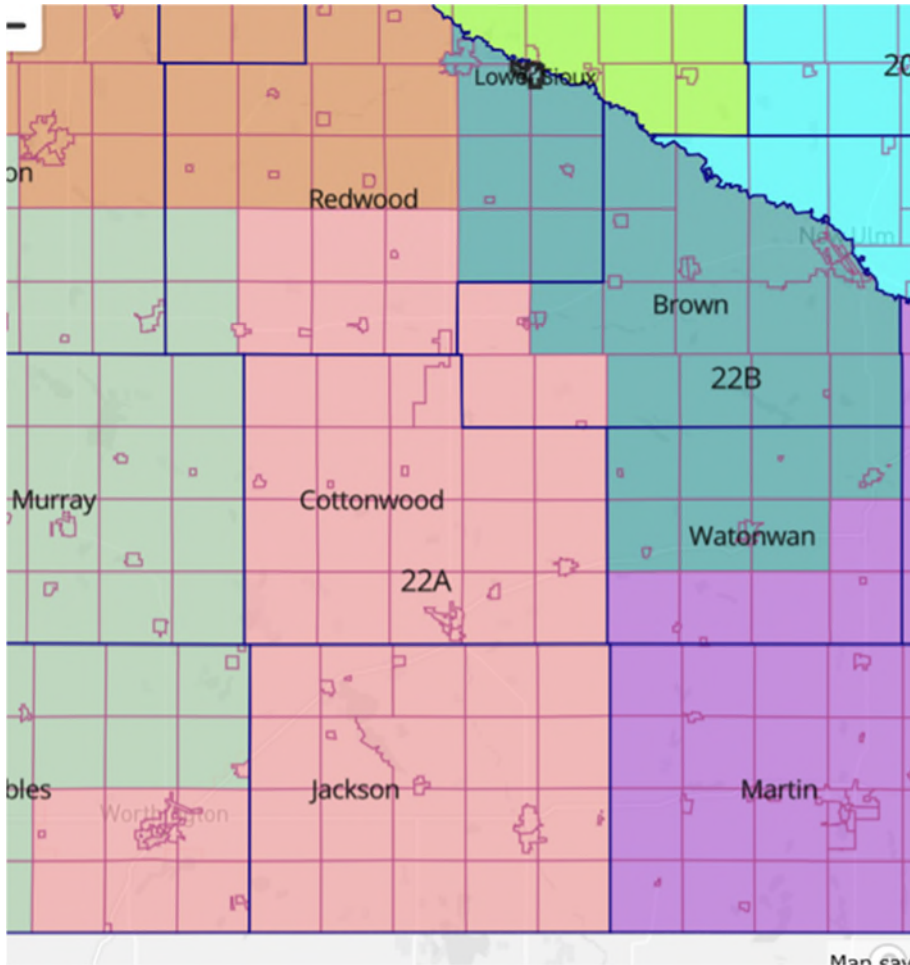
Senate District 21; House Districts 21A (beige) and 21B (light green)



Proposed House District 21A has a total population of 42,545 and encompasses includes all of Lac qui Parle and Yellow Medicine Counties, and the northern parts of Lincoln, Lyon, and Redwood Counties. The Upper Sioux Indian Community is wholly within Proposed House District 21A, thus respecting the Dakota Oyate Nation and the generations of people who have lived in this place. The Dakota Oyate Nation calls this land Pejuhutazizi Kapi (the place where dig for yellow medicine); it has been the homeland of these people for thousands of years. (See www.upperSiouxcommunity-nsn.gov; see also <https://mn.gov/indianaffairs/upperSioux-iac.html>).

Proposed House District 21B has a total population of 42,394 and includes all of Pipestone and Murray Counties, the parts of Lincoln and Lyon Counties not in Proposed House District 21A, most of Nobles County outside of the Worthington area, and southwest Redwood County.

Senate District 22; House Districts 22A (pink) and 22B (forest green)



Proposed House District 22A has a total population of 42,687 and includes all of Jackson and Cottonwood Counties, and the southeaster quadrant of Nobles County. These southeastern Minnesota communities are home to several agribusinesses and food processing facilities, which are supported by a growing and vibrant community of Latinos

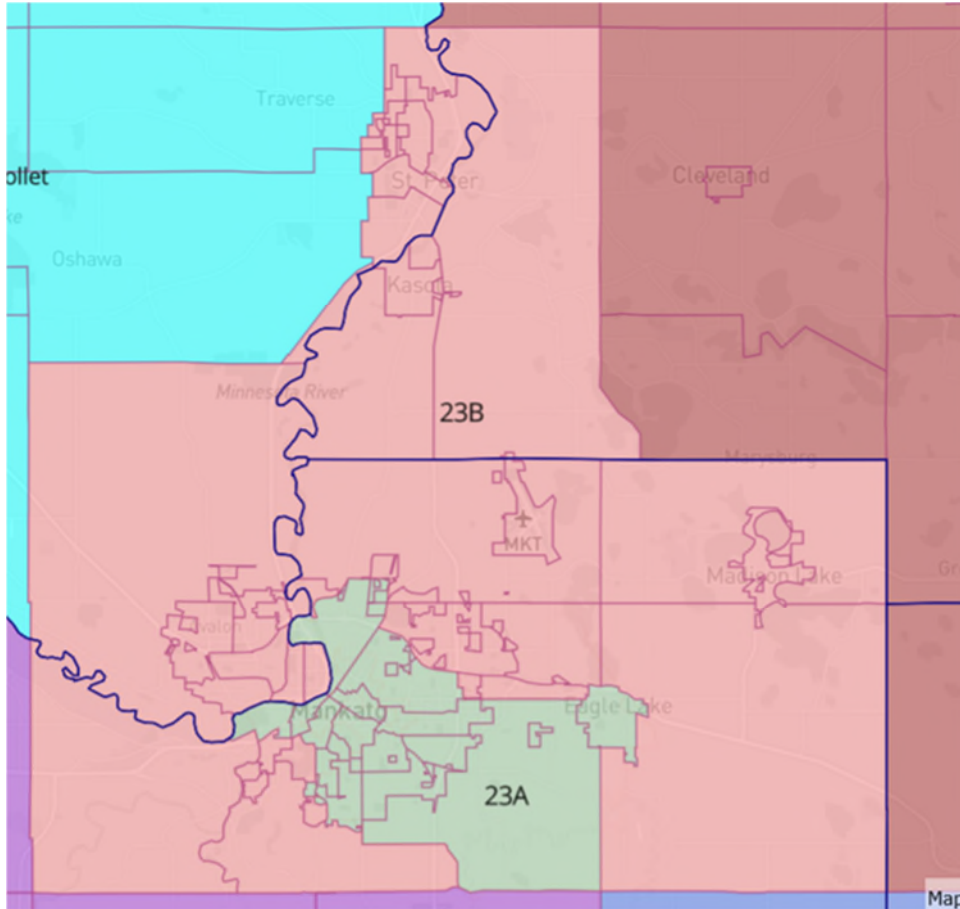
and other persons of color. Proposed House District 22A includes Worthington, Windom and Mountain Lake and has a \$259 million ethnic economy. (Corrie Declaration ¶ 6.) The commercial corridor along Highway 25 and 5th Avenue in Worthington is an example of the contributions of ethnic businesses and people to the economy. (*Id.*) Community leaders and representatives of the Minnesota Immigrant Movement, which is active in these communities, supports the Proposed House District 22A because it keeps these Latino and persons of color communities together. (*See* Declaration of Jovita Francisco (“Francisco Declaration.”))

Proposed House District 22B has a total population of 42,528 and includes eastern Redwood and northern Watonwan Counties, along with parts of Brown County. This district is mostly rural, with meat packing plants being a major economic driver.

Proposed Senate District 22 unites two centers of Latino/Hispanic populations in southern Minnesota (Worthington and St. James). Immigrants from Central America, Asia, and Africa have boosted Worthington’s population and its downtown economy. (*See* Immigrant Law Center of Minnesota, Immigrants Building Worthington (Mar. 9, 2020), *available at* www.ilcm.org/latest-news/immigrants-building-Worthington.) From meat packing plants to hospitals, immigrants have helped to grow Worthington into a thriving center. Like Worthington, St. James is also a small town that has seen fast growth because of an influx of immigrant families drawn initially to work at nearby meat packing factories. (*See* LatinoLEAD, Greater MN Story – Convivencia (Mar. 3, 2020), *available at* www.latinoleadmnmn.org/post/greater-mn-story-convivencia-hispana.) Uniting these two communities into one Senate District would allow a Senator to be more responsive to issues

such as severe educational and economic disparities in the state. (See Francisco Declaration.)

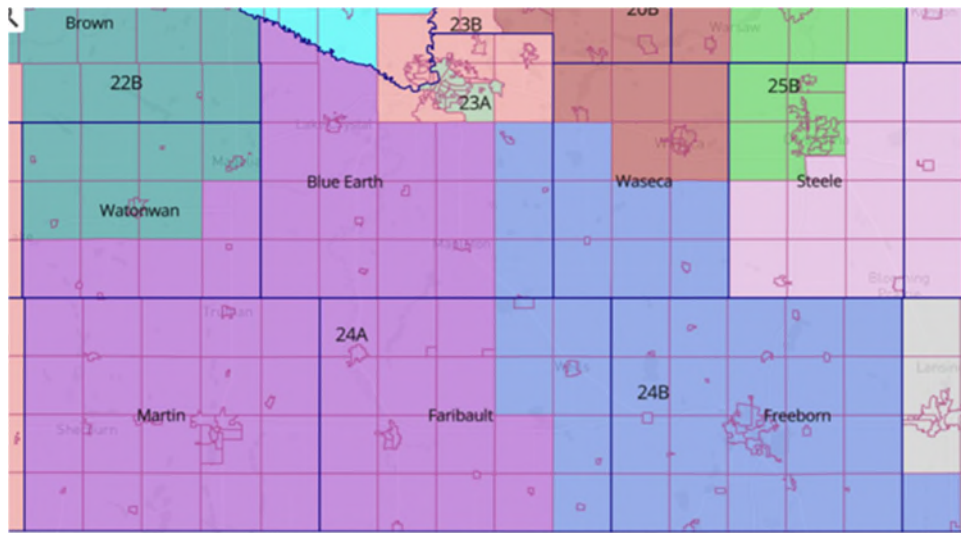
Senate District 23; House District 23A (light green) and 23B (pink)



Proposed House District 23A has a total population of 42,359 and encompasses most of Mankato, Eagle Lake, and the southeastern section of Mankato Township.

Proposed House District 23B has a total population of 42,532 and encompasses North Mankato, St Peter, southwestern Mankato, and surrounding townships.

Senate District 24; House Districts 24A (purple) and 24B (blue)



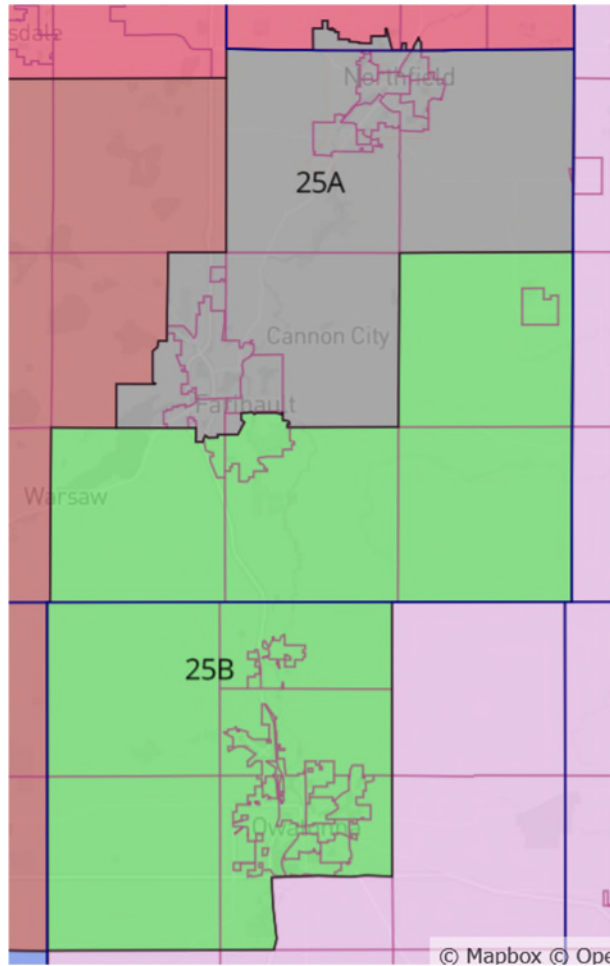
Proposed House District 24A has a total population of 42,677 and includes all of Martin County (including Fairmont), western Faribault County, southeastern Watonwan County, and the southern portion of Blue Earth County.

Proposed House District 24B has a total population of 42,684 and includes all of Freeborn County, and portions of Faribault, Blue Earth, Waseca, and Mower Counties.

The BIPOC community in these two proposed districts is substantial and should be kept together in the same voting districts. (See Declaration of Cecilio Palacio (“Palacio Declaration.”) Latinos and Black residents represent 12.4 and 9.2 percent of Faribault’s residents, respectively. While the city has lost close to 7.9 percent of its white population in recent years, its Latino communities have grown by 7.4 percent, making up the difference and helping to maintain the local economy. Many of the Latino community members in this region come from the same area of Mexico, the state of Veracruz, and have followed friends, family, and opportunities for a better life in Minnesota. These

communities share similar interests and needs, including the need for a high-quality public education. (*Id.*)

Senate District 25; House Districts 25A (gray) and 25B (light green)



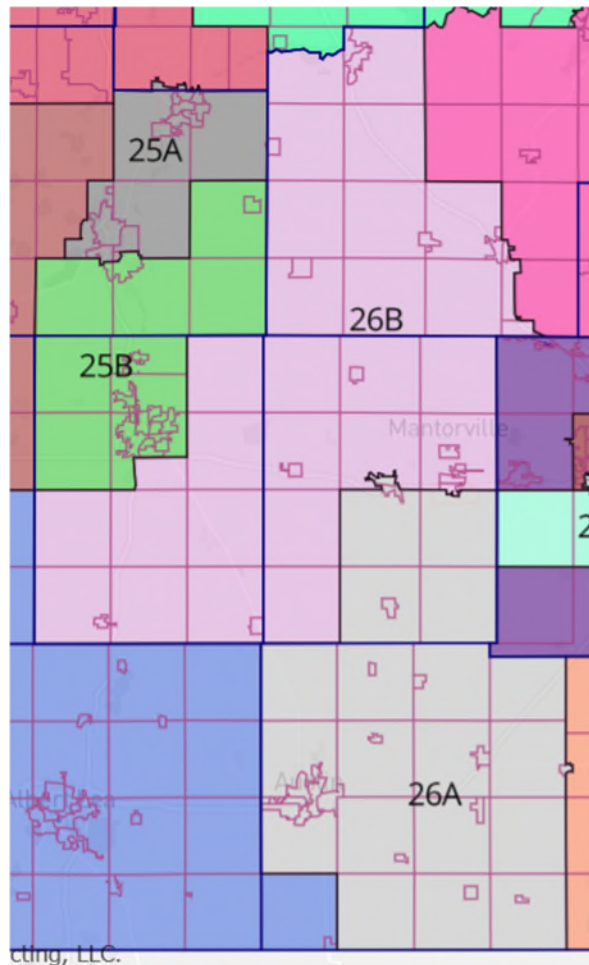
Proposed House District 25A has a total population of 42,623 and is located almost entirely in Rice County; it also includes portions of southeastern Dakota County that fall within the city of Northfield. Specifically, Proposed House District 25A includes all of the city of Northfield and the neighboring Rice County townships of Cannon City, the northern $\frac{3}{4}$ of Faribault City, and the southeast corner of Wells Township. The population of this proposed district is 13% Latino/Hispanic and 26% BIPOC. Cohorts with the Latino/Hispanic community wanted the major mobile home parks in the area to be placed

into one house district. (See All Parks Alliance for Change, <http://allparksallianceforchange.org/?q=reports/list>; see also Palacio Declaration.)

Manufactured homes are a more affordable option for home ownership for many lower income families. However, development in the areas of the mobile home parks poses a serious threat to this type of affordable housing.

Proposed House District 25B has a total population of 42,717 and includes southeast portions of Rice County, including a quarter of the city of Faribault and northwest Steele County including the city of Owatonna.

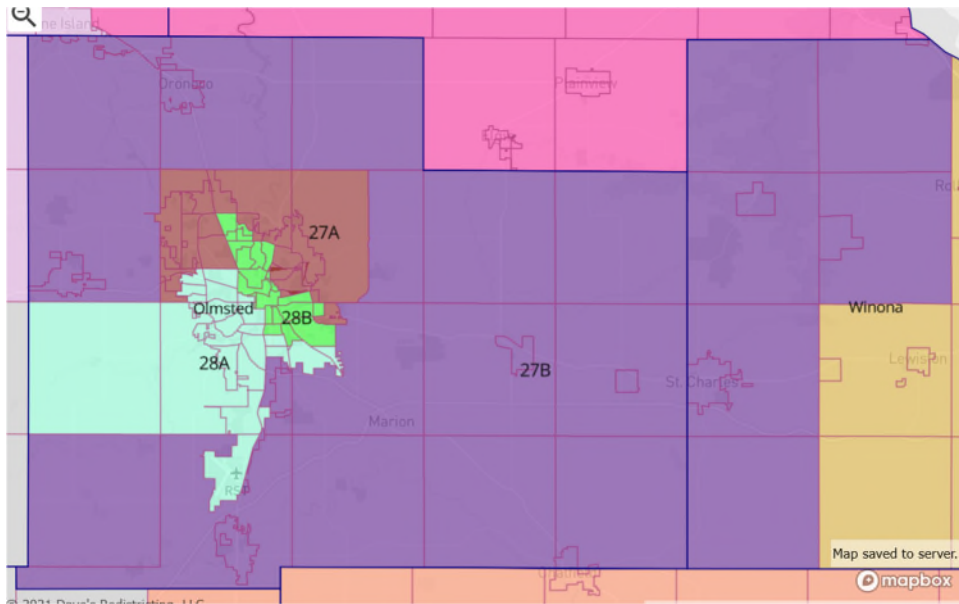
Senate District 26; House Districts 26A (gray) and 26B (pink)



Proposed House District 26A has a total population of 42,641 and includes western Goodhue County, northwestern Dodge County, and the southern and eastern portions of Steele County. The City of Cannon Falls would fall within this district.

Proposed House District 26B has a total population of 42,415 and includes Central Mower County, including the City of Austin, and southeast Dodge County.

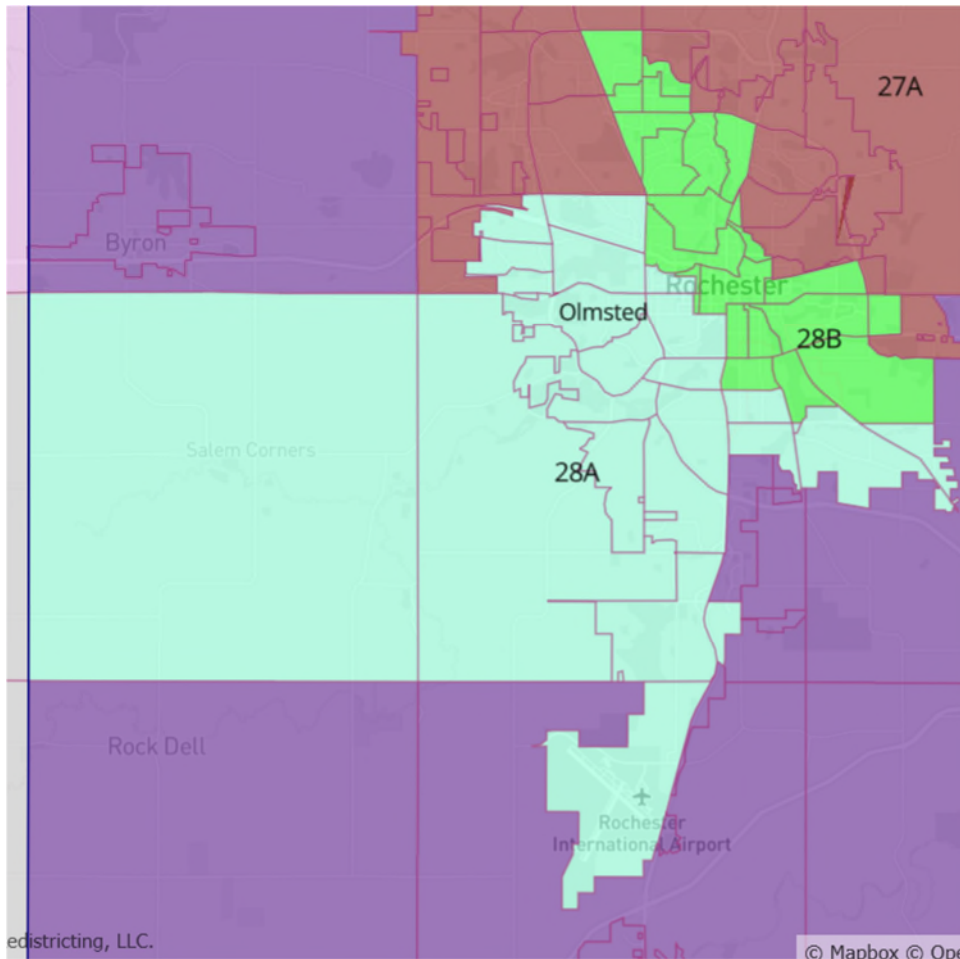
Senate District 27; House Districts 27A (brown) and 27B (purple)



Proposed House District 27A has a total population of 42,523 and includes portions of north and east Rochester.

Proposed House District 27B has a total population of 42,678 and includes the vast majority of the non-Rochester part of Olmsted County, including Byron and Orinoco, and western Winona County, including St Charles.

Senate District 28; House Districts 28A (light blue) and 28B (green)



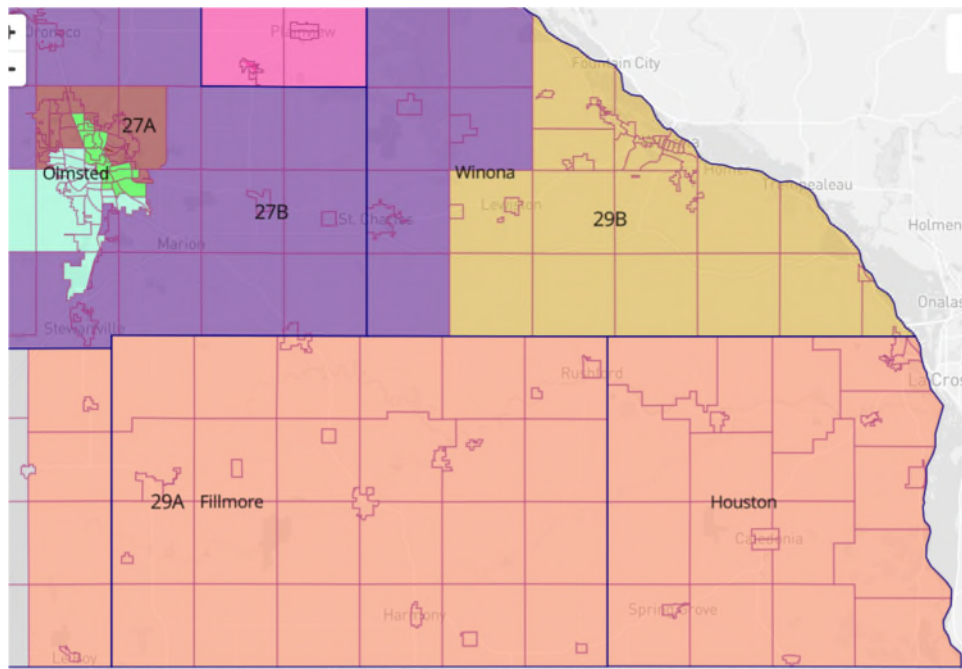
Proposed House District 28A has a total population of 42,441 and is wholly located in Olmsted County; it also includes significant portions of the city of Rochester.

Proposed House District 28B has a total population of 42,441 and encompasses the core of the city of Rochester. This population of this is 37% BIPOC (16.6% Black/African American, 9.9% Latino/Hispanic, 8.5% Asian, and 2.0 American Indian/Native American). By 2028, the Census Bureau projects these populations to surpass 40% BIPOC.

Proposed Senate District 28 unifies major portions of Rochester, rather than spitting the city's Latino/Hispanic and East African communities.

Rochester BIPOC community members have requested that its Latino/Hispanic and East African communities be kept together, as reflected in the Corrie Plaintiffs’ Proposed Legislative Plan for Senate District 28 and House Districts 28A and 28B. (See Declaration of Rebeca Sedarski (“Sedarski Declaration.”))

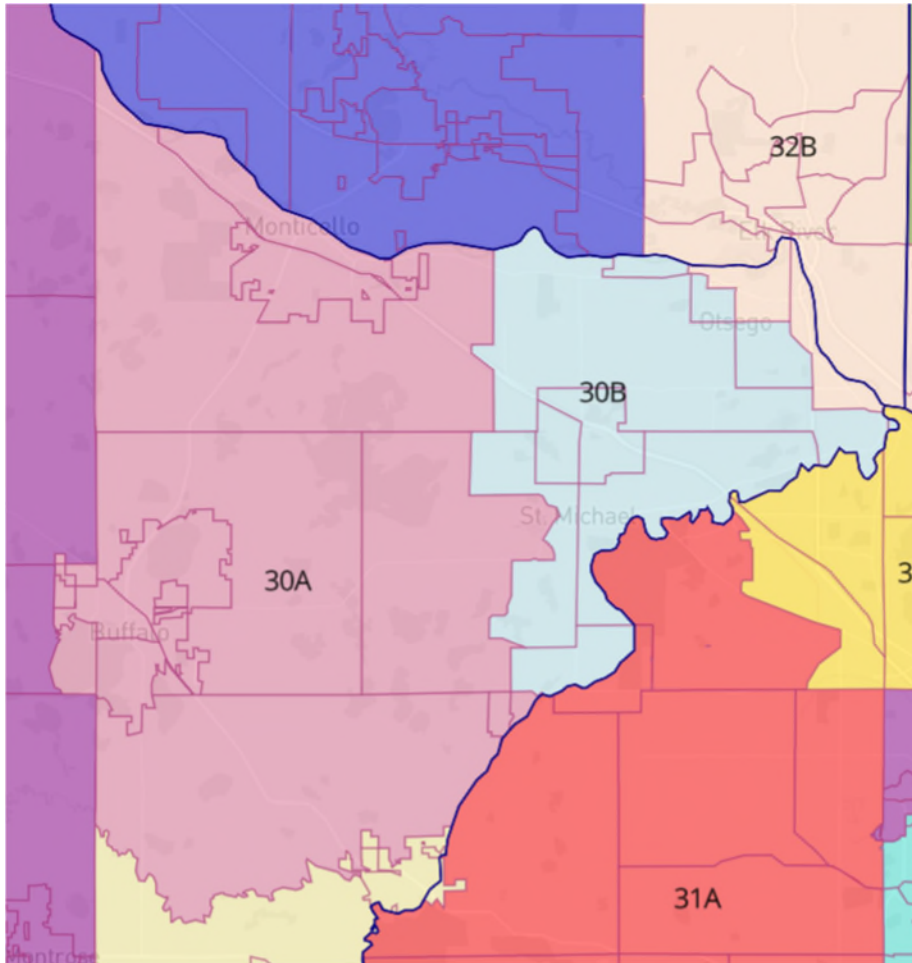
Senate District 29; House Districts 29A (light brown) and 29B (yellow)



House District 29A has a total population of 42,834 and includes all of Houston and Fillmore Counties, along with the far-east portion of Mower County. This district includes the municipality of Spring Valley.

House District 29B has a total population of 42,435 and includes southeast portions of Winona County. This district includes the city of Winona, which is the county seat.

Senate District 30; House Districts 30A (pink) and 30B (light blue)

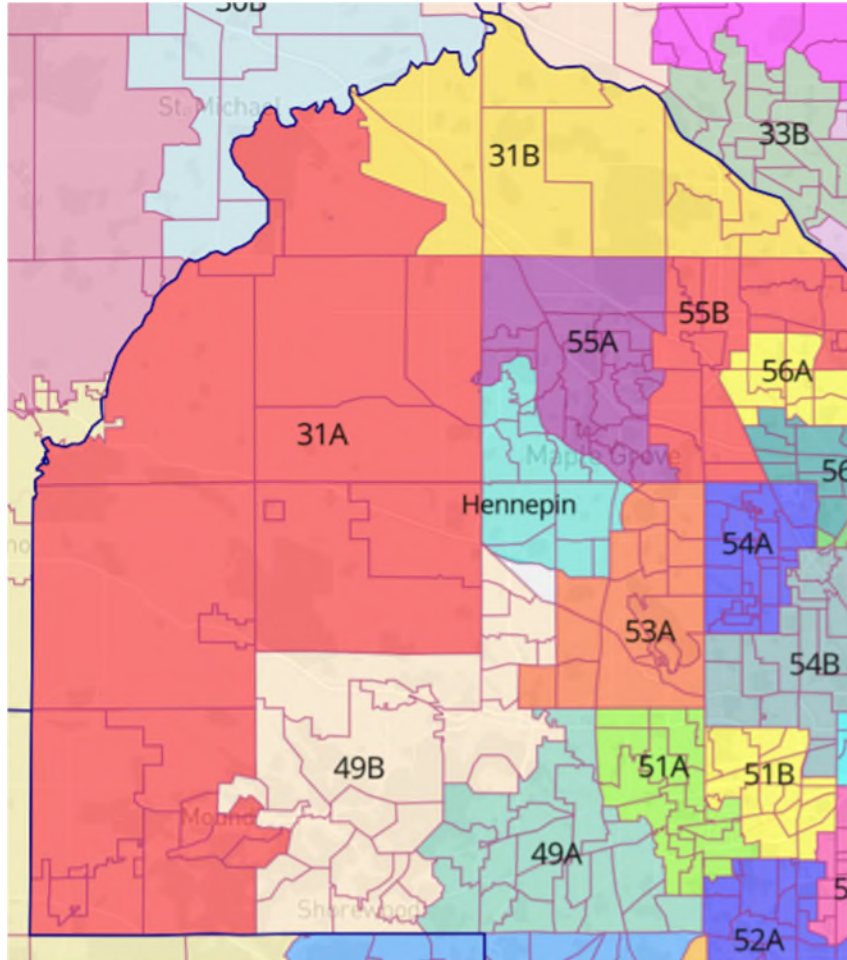


Proposed House District 30A has a total population of 42,561 and is primarily comprised of eastern Wright County, along with small portions of southeast Meeker County and north central McLeod County. This district holds together the fast-growing exurbs of the West Metro area of Minneapolis-St. Paul, including Buffalo, the county seat of Wright County, and the city of Monticello.

Proposed House District 30B has a total population of 42,625 and is comprised of the majority of far-eastern Wright County, excluding small portions of Otsego Township,

which were placed in neighboring 32B to reduce the number of city splits in this and other neighboring districts.

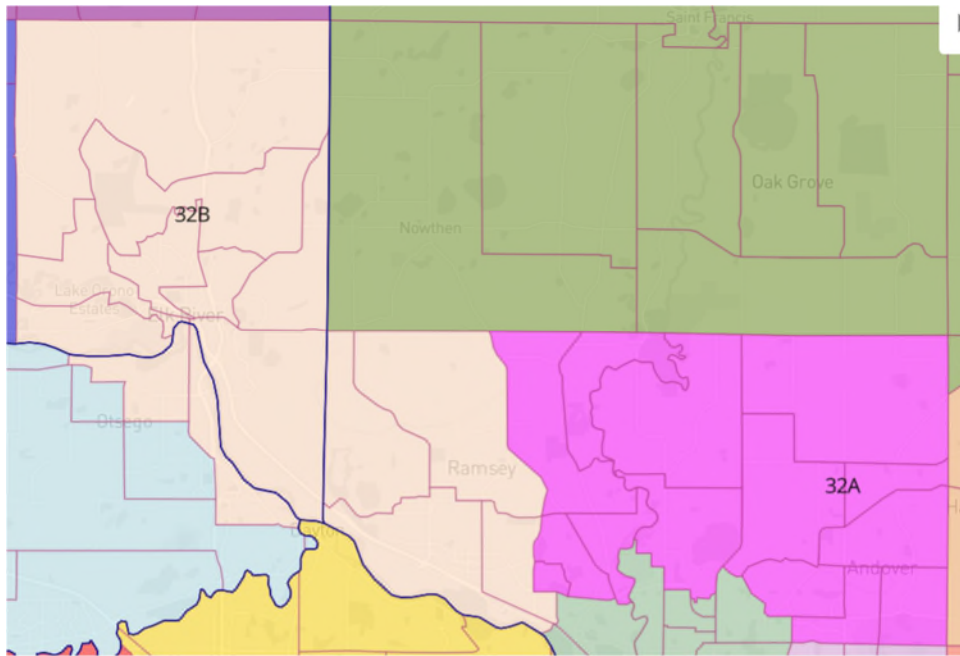
Senate District 31; House Districts 31A (red) and 31B (yellow)



Proposed House District 31A has a total population of 42,580 and is located entirely in Hennepin County. The district includes western portions of the county, including the rural exurbs in western Hennepin County as well as small municipalities such as Mound and St. Bonifacius.

Proposed House District 31B has a total population of 42,541 and includes northern Hennepin County, including the city of Champlin and most of the city of Rogers.

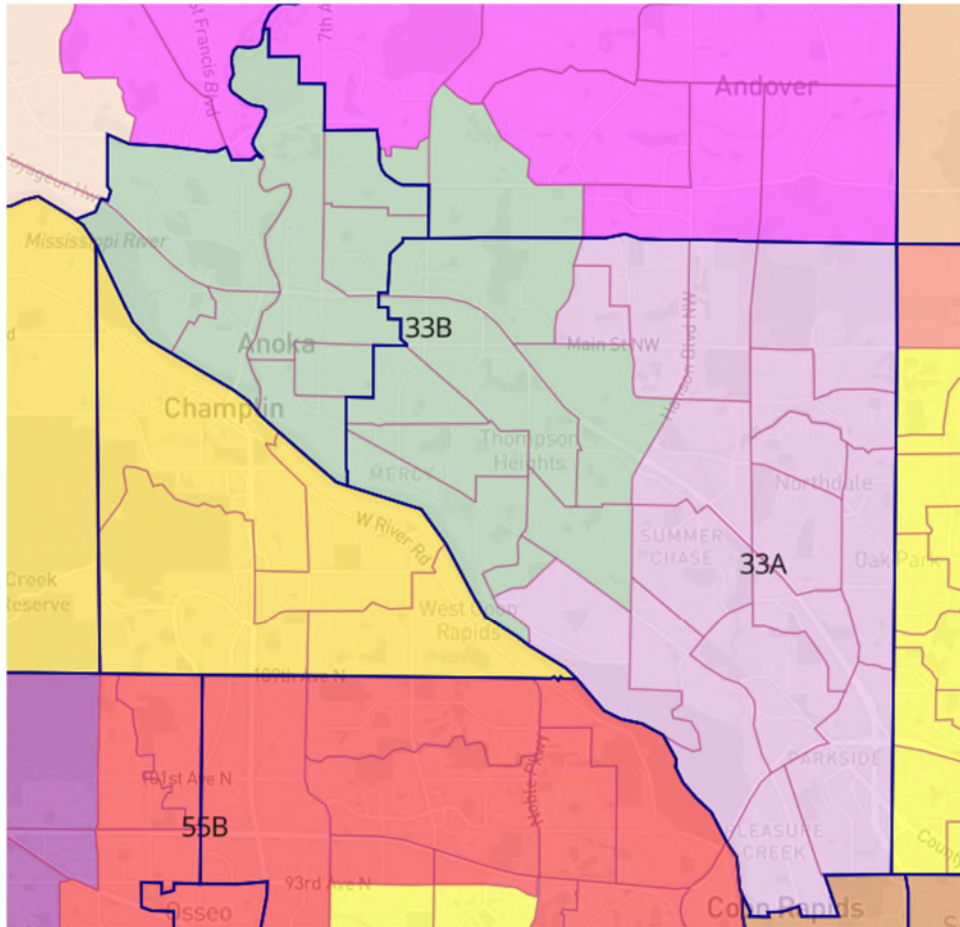
Senate District 32; House Districts 32A (pink) and 32B (beige)



Proposed House District 32A has a total population of 42,557 and includes the majority of the city of Andover and approximately 1/3 of the city of Ramsey.

Proposed House District 32B has a total population of 42,613 and includes most of the city of Ramsey, the entire city of Elk River, and a small portion of Otsego.

Senate District 33; House Districts 33A (light purple) and 33B (light green)

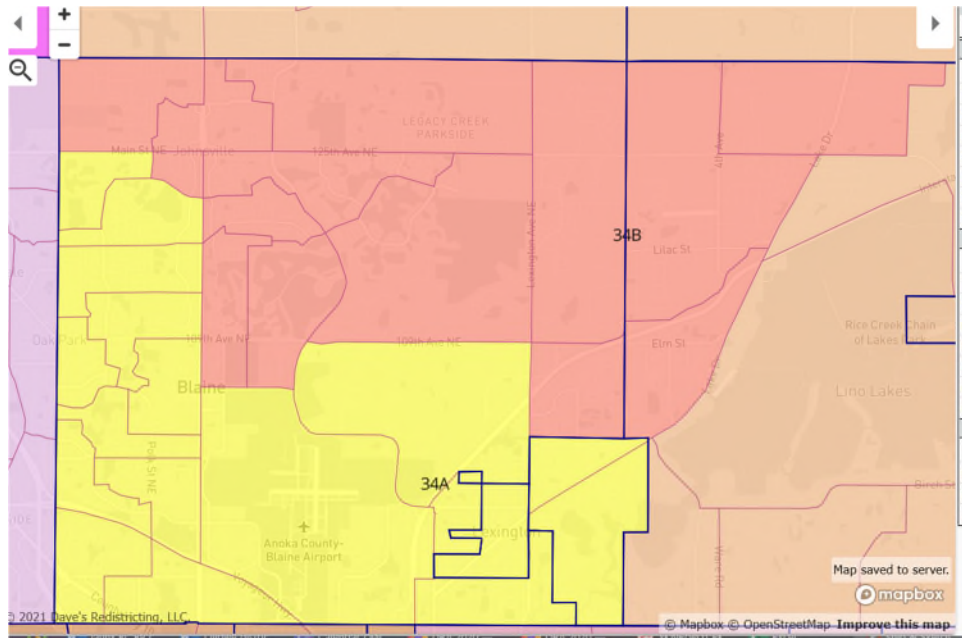


Proposed House District 33A has a total population of 42,767 and includes portions of Coon Rapids with large BIPOC populations. It is 28% BIPOC, including a 10% Black/African American population.

House District 33B has a total population of 42,776 and includes the portions of Coon Rapids not in district 33A, all of the city of Anoka and small portions of the city of Andover to achieve population equality.

Senate District 33 encompasses the entire cities of Coon Rapids, Anoka and surrounding areas into one district.

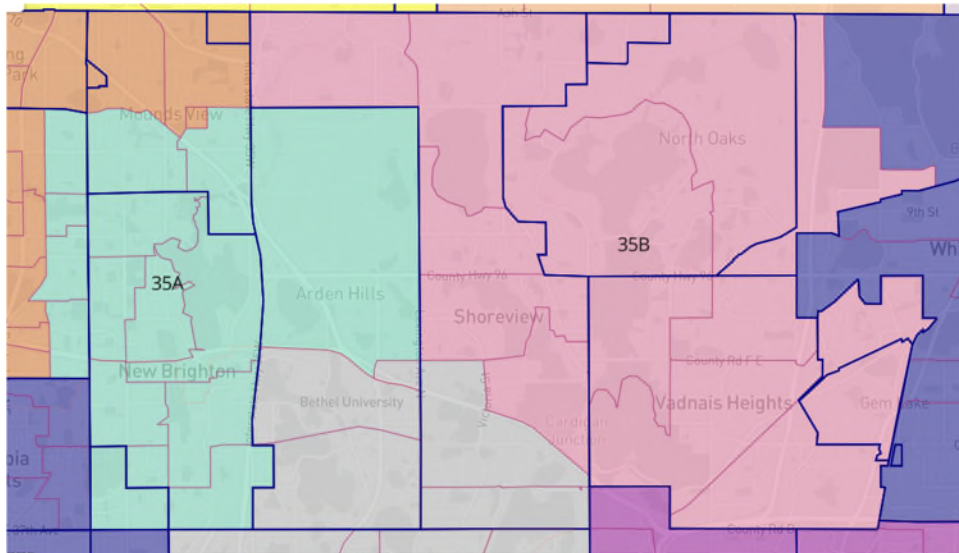
Senate District 34; House Districts 34A (yellow) and 34B (orange)



Proposed House District 34A has a total population of 42,652 and is wholly located in Anoka County. It includes southwestern Blaine, which is the most diverse part of the suburban city, and all of Circle Pines and Lexington. The population in this district is 28% BIPOC, including 9.5% Asian/Pacific Islander population.

House District 34B has a total population of 42,572 and includes the portions of Blaine not included in House District 34A, as well as portions of Lino Lakes that are northwest of Lake Drive.

Senate District 35; House Districts 35A (light green) and 35B (pink)

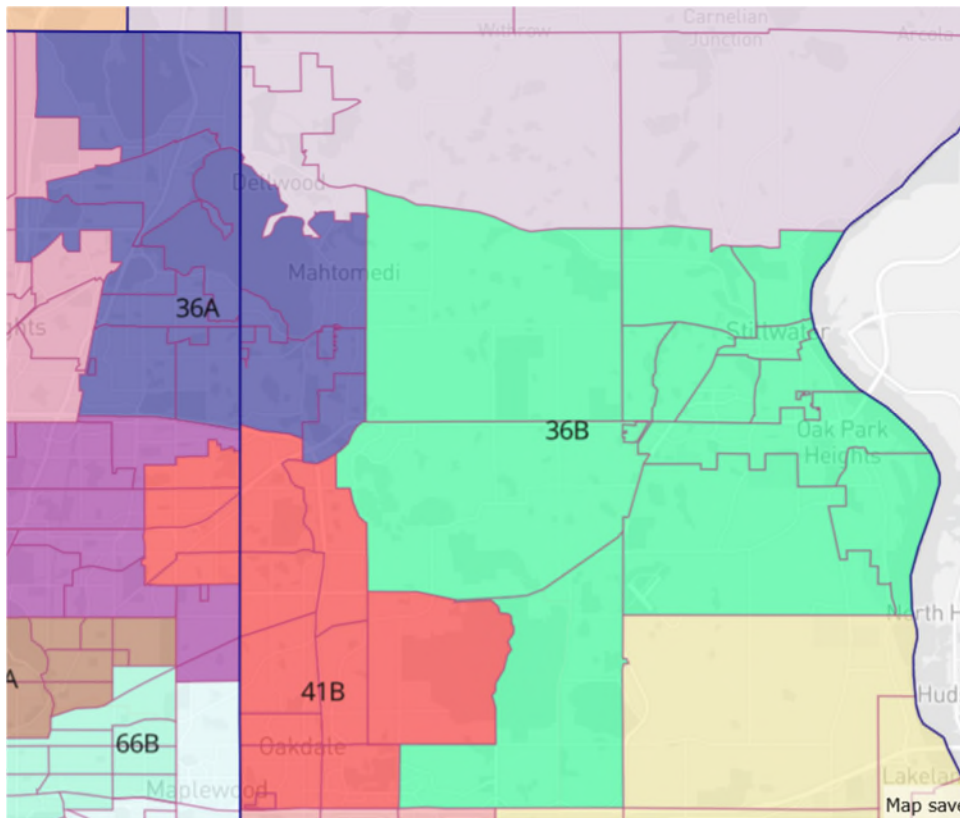


Proposed House District 35A has a total population of 42,776 and includes all of New Brighton, the portion of St. Anthony located in Anoka County, and the portions of eastern Fridley and southern Mounds View that contain the area’s Tibetan community, along with the northern half of Arden Hills. The Tibetan community in this area is the second largest Tibetan community in the United States, and leaders of the Tibetan American Foundation of Minnesota (“TAFM”) support the Corrie Plaintiffs’ Proposed House District 35A because it keeps this community together. (See Declaration of Ngawang Dolker “Dolker Declaration.”) Programs offered by TAFM in this area are aimed at preserving and promoting Tibetan cultural tradition and civically engaging all Tibetan Minnesotans. (*Id.*) Tibetan community members work in this area as nurses, nursing assistants, cooks, housekeepers, and other hospital staff in the major hospitals located in Hennepin County. (*Id.*) Because of how the Tibetan community migrated to Minnesota in the 1990’s, they were ineligible for public assistance and had to

form a strong, interconnected network of mutual aid resources. (*Id.*) The makeup of Proposed House District 35A is 34% BIPOC, including 14% Black/African American and 10% Asian/Pacific Islander.

Proposed House District 35B has a total population of 42,693 and includes the majority of Shoreview that is located north of I-694, all of Vadnais Heights and Gem Lake, and western portions of White Bear Township.

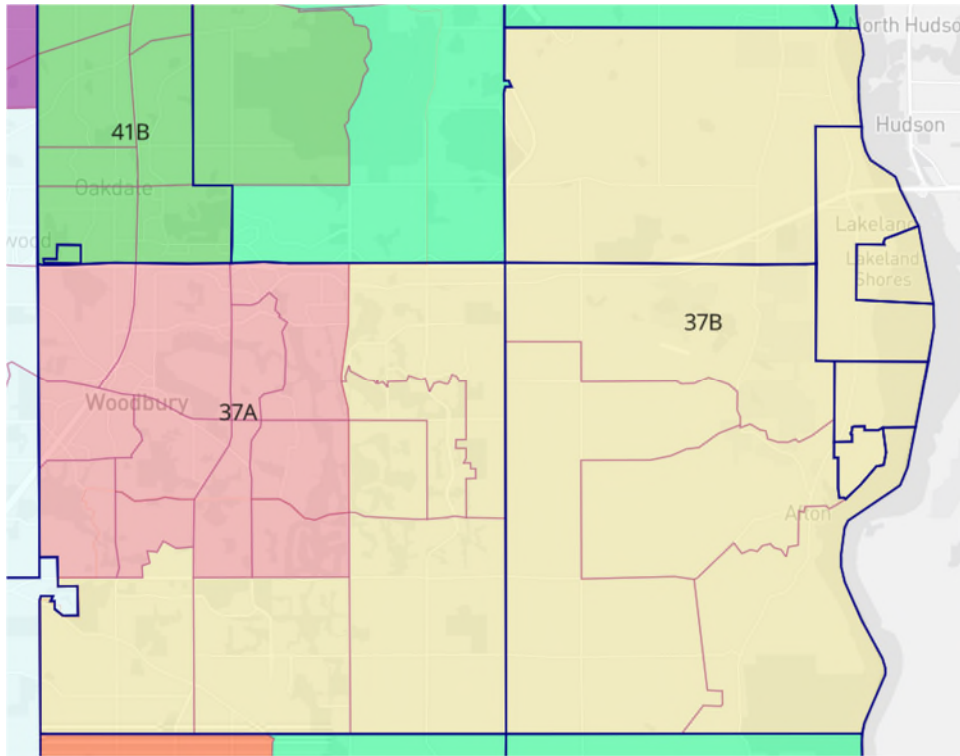
Senate District 36; House Districts 36A (dark blue) and 36B (green)



Proposed House District 36A has a total population of 42,544 and includes all of White Bear Lake, Mahtomedi, Pine Springs, Willernie, and Birchwood Village, along with the eastern portion of White Bear Township.

Proposed House District 36B has a total population of 42,671 and includes all of Stillwater, Oak Park Heights, Bayport, Baytown, portions of Grant Township south of Dellwood Rd., and portions of Lake Elmo east of Keats Ave and south of Stillwater Blvd.

Senate District 37; House Districts 37A (pink) and 37B (yellow)

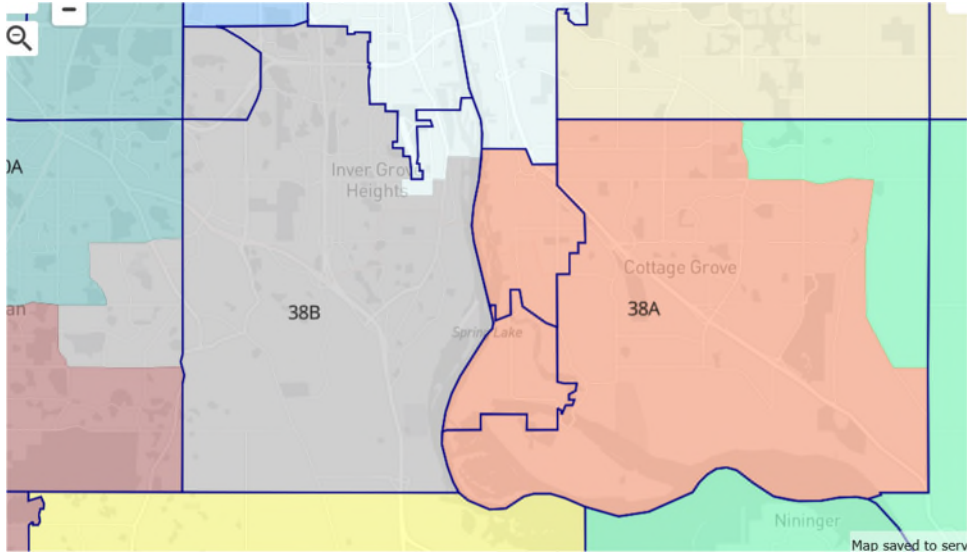


Proposed House District 37A has a total population of 42,752, is located in Washington County, and includes northwestern portions of Woodbury that are located north of Bailey Rd. and west of Woodbury Drive. This proposed district is composed of 28% BIPOC community members—including 11.7% Asian, 9.4% Black/African American, 5.1% Latino/Hispanic, 1.7% American Indian/Native American, and 0.1% Pacific Islander.

House District 37B has a total population of 42,726, is located in Washington County, and includes the portions of Woodbury not included in House District 37A, all of

West Lakeland Township, Lakeland, Lakeland Shores, Afton, Lake St Croix Beach, and St. Mary's Point.

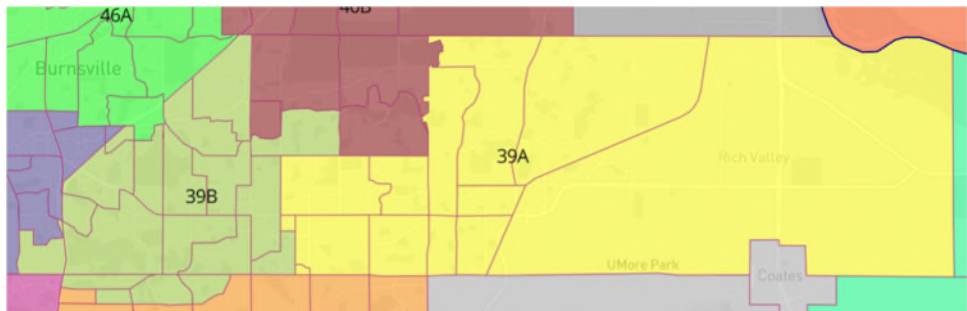
Senate District 38; House Districts 38A (orange) and 38B (gray)



Proposed House District 38A has a total population of 42,759 and includes all of Grey Cloud Island and St. Paul Park, as well as the majority of Cottage Grove.

Proposed House District 38B has a total population of 42,435 and includes all of Sunfish Lake, a portion of east-central Eagan, and nearly all of Inver Grove Heights, other than a small portion assigned to HD 67A to equalize population.

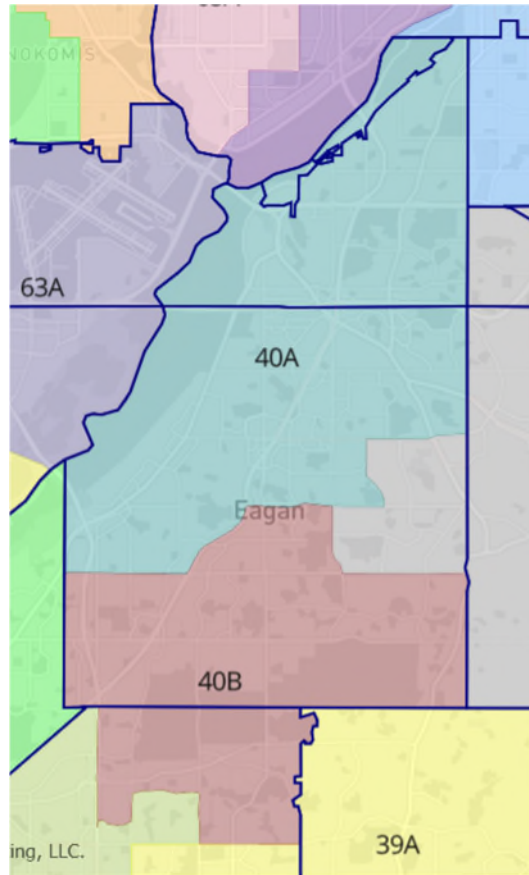
Senate District 39; House Districts 39A (yellow) and 39B (green-grey)



Proposed House District 39A has a total population of 42,720 and is wholly located in Dakota County; it includes all of Roseville, which is considered a suburb of both Minneapolis and St. Paul, along with southeast portions of Apple Valley.

Proposed House District 39B has a total population of 42,532 and includes southwestern Apple Valley, eastern Burnsville not included in Senate District 46, and a small portion of Lakeville that shares similar population characteristics to ensure equal population.

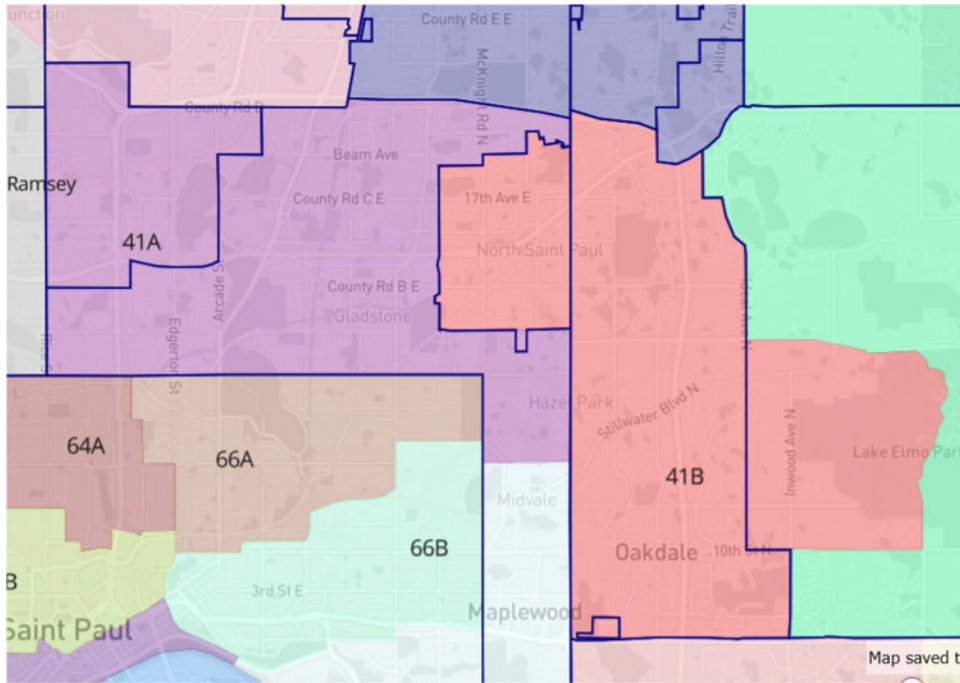
Senate District 40; House Districts 40A (green) and 40B (brown)



Proposed House District 40A has a total population of 42,625 and includes all of Lilydale, Mendota, and Mendota Heights, as well as northern parts of Eagan.

Proposed House District 40B has a total population of 42,626 and includes southern Eagan and north-central Apple Valley.

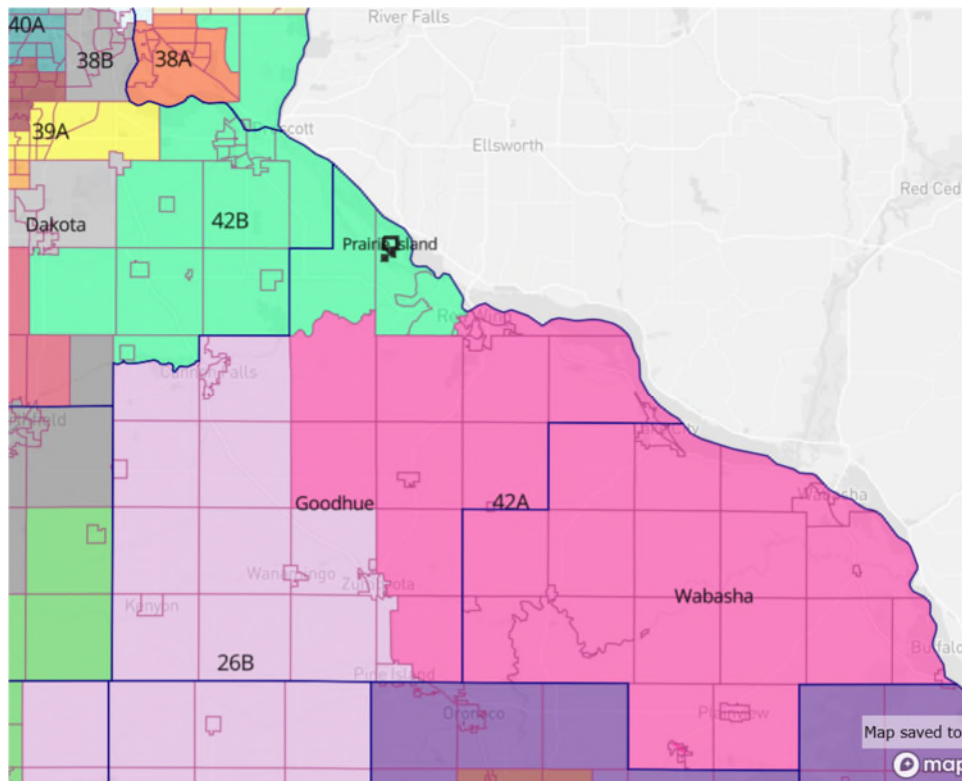
Senate District 41; House Districts 41A (purple) and 41B (red)



Proposed House District 41A has a total population of 42,407 and includes all of Little Canada and the northern half of Maplewood. The population of the district is 54.4% White/Caucasian, 20.8% Asian, 13.7% Black/African American, 9.8% Latino/Hispanic, 2.3% American Indian/Native American, and 0.2% Pacific Islander.

Proposed House District 41B has a total population of 42,399 and includes all of North St Paul and Oakdale, with portions of Lake Elmo.

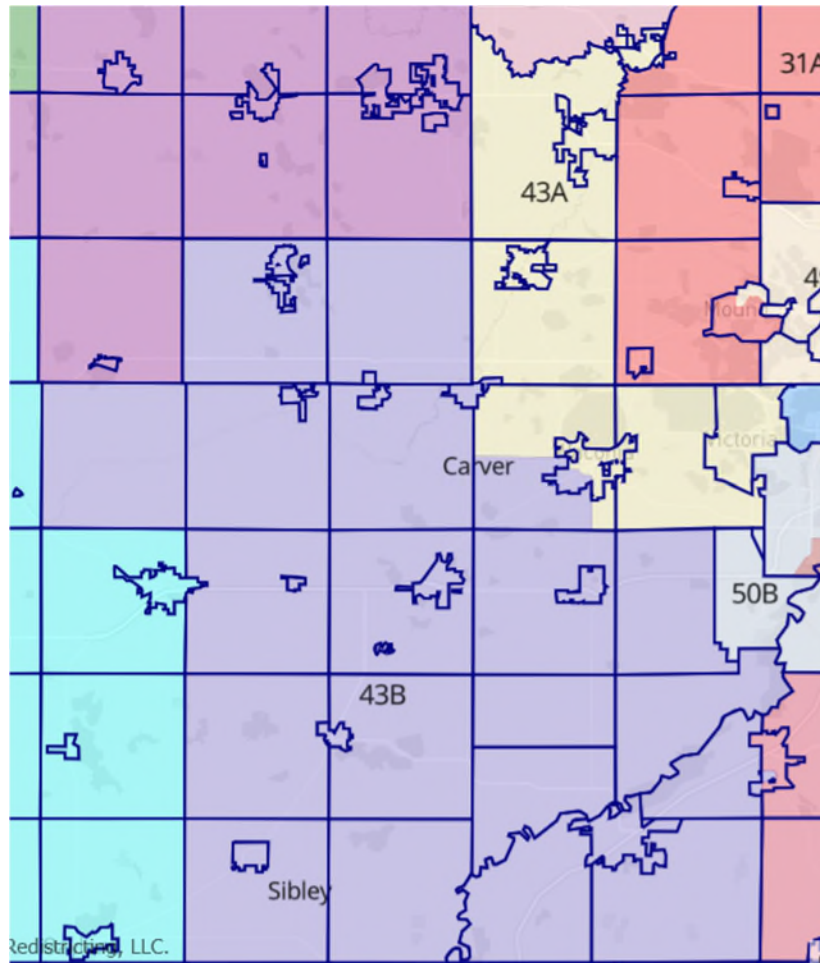
Senate District 42; House Districts 42A (dark pink) and 42B (green)



Proposed House District 42A has a total population of 42,510 and includes all of Wabasha County and eastern Goodhue County, which includes most of the city of Red Wing.

Proposed House District 42B has a total population of 42,722 and is centered on the city of Hastings; it also includes eastern Dakota County and northern Goodhue County, the townships of Nininger and Denmark, and portions of Cottage Grove.

Senate District 43; House Districts 43A (beige) and 43B (purple)

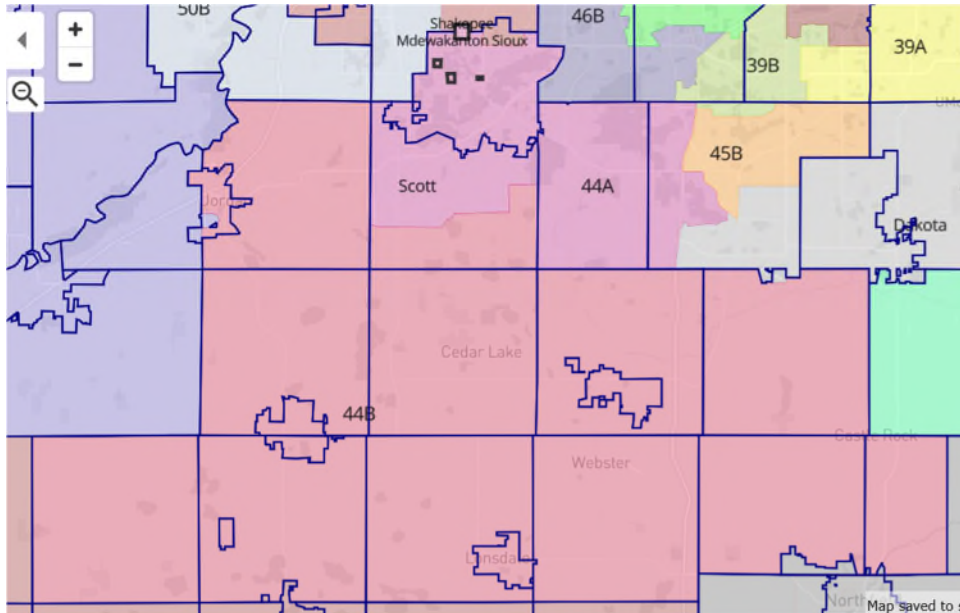


Proposed House District 43A has a total population of 42,391 and encompasses suburb/exurbs west and south of Hennepin County, including the cities of Rockford, Delano, Watertown, Victoria, and most of Waconia. These areas share several characteristics including a quickly growing population and a proximity to Minneapolis-St. Paul.

Proposed House District 43B has a total population of 42,630 and includes southwestern Carver County, eastern Sibley County, and western McLeod County. The

district includes Norwood Young America, Belle Plaine and portions of Jordan to achieve equal population.

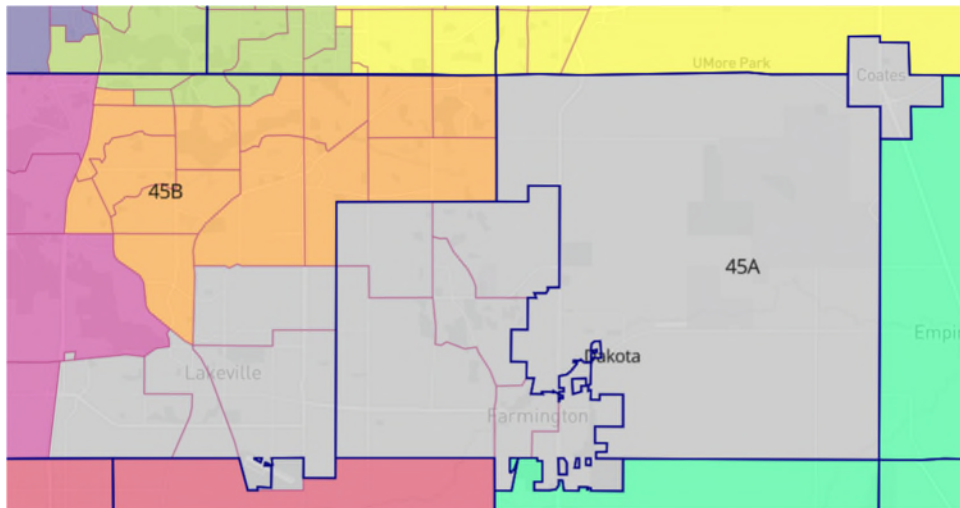
Senate District 44; House Districts 44A (pink) and 44B (rouge)



Proposed House District 44A has a total population of 42,673 and includes Prior Lake, Credit River, west Lakeville, and most of Spring Lake Township. This district was drawn to include the Shakopee Mdwakanton Sioux Community. The Shakopee Mdwakanton Sioux Community includes important economic drivers such as the Mystic Showroom, an entertainment venue and SMSC Water Bottling. (See www.ShakopeeDakota.org.) Preserving this community is essential.

Proposed House District 44B has a total population of 42,549 and includes south-central Scott County, western Dakota County, northern Rice County and northeast Le Sueur County. This district centers on the cities of New Prague, Lonsdale, Jordan, and Elko New Market.

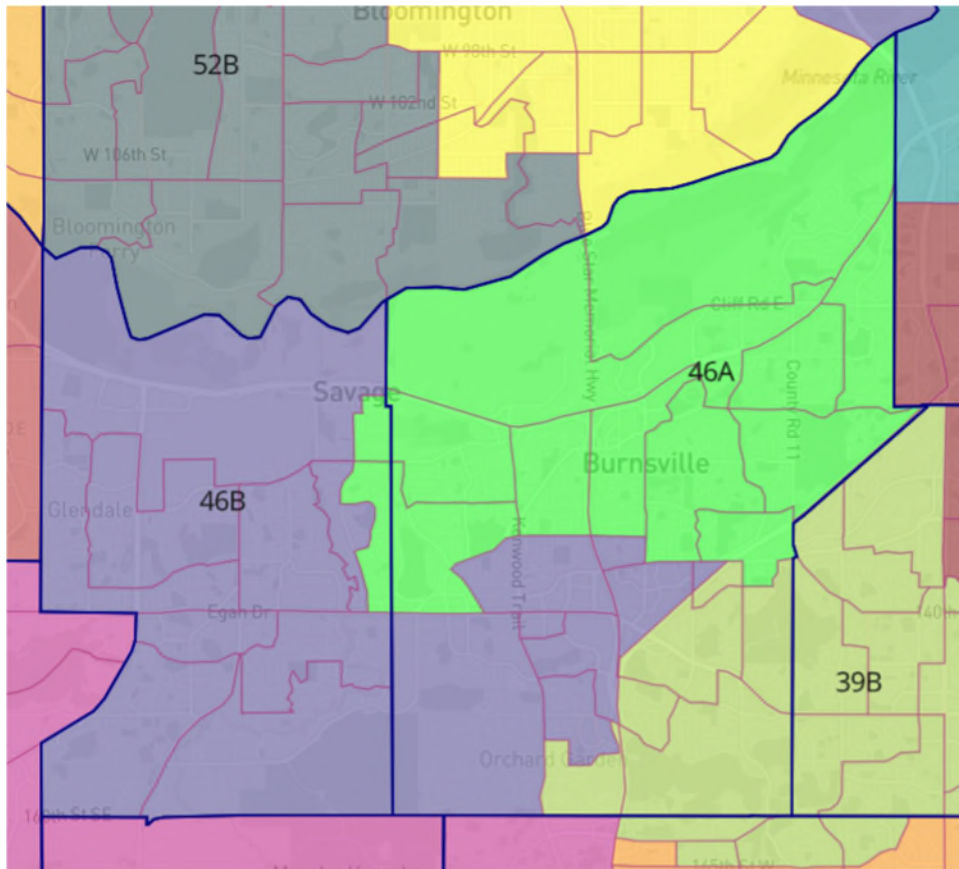
Senate District 45; House Districts 45A (gray) and 45B (orange)



Proposed House District 45A has a total population of 42,791, is located in Dakota County, and includes all of Farmington and Empire Township and southeast Lakeville.

Proposed House District 45B has a total population of 42,381 and includes northeast Lakeville.

Senate District 46; House Districts 46A (green) and 46B (purple)

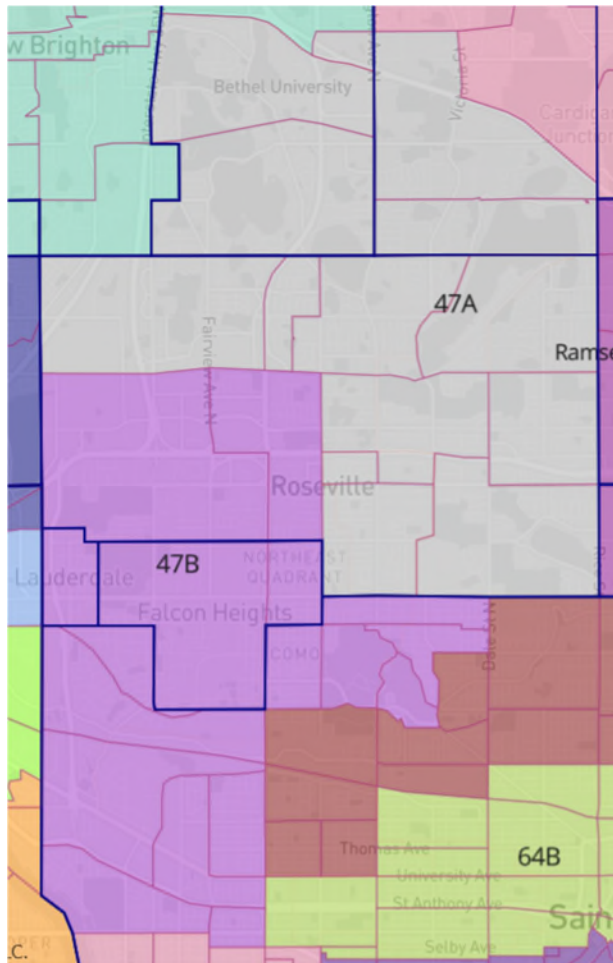


Proposed House District 46A has a total population of 42,766 and is primarily located in Dakota County, with a small portion of northeast Scott County, in a way that unites East African cohorts who desire to live within a single house district. (See Declaration of Wali Dirie (“Dirie Declaration”) ¶ 1). The population of this district is 59.5% White/Caucasian, 20.2% Black/African American, 10.3% Latino/Hispanic, 8% Asian, 2.1% American Indian/Native American, and 0.3% Pacific Islander. The boundary between 46A and neighboring districts aims to avoid splitting Latino/Hispanic and East African voters in this area.

The East African residents in this area include Somali, Ethiopian, and other populations. They face unique challenges and would benefit from being held together in a single House district. For example, according to Statista: “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. (Dirie Declaration ¶ 3). Nonetheless, the East African community has “formed a network of social service, health, and economic development organizations to help new arrivals and assist with economic development.” (Dirie Declaration ¶ 5.) According to Mr. Dirie, “Breaking up our community structure [would do] 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.” (Dirie Declaration ¶ 6). House District 46A was drawn to address these concerns and keep the East African community whole.

Proposed House District 46B has a total population of 42,566 and includes most of the city of Savage and the southwest portions of Burnsville.

Senate District 47; House Districts 47A (gray) and 47B (purple)



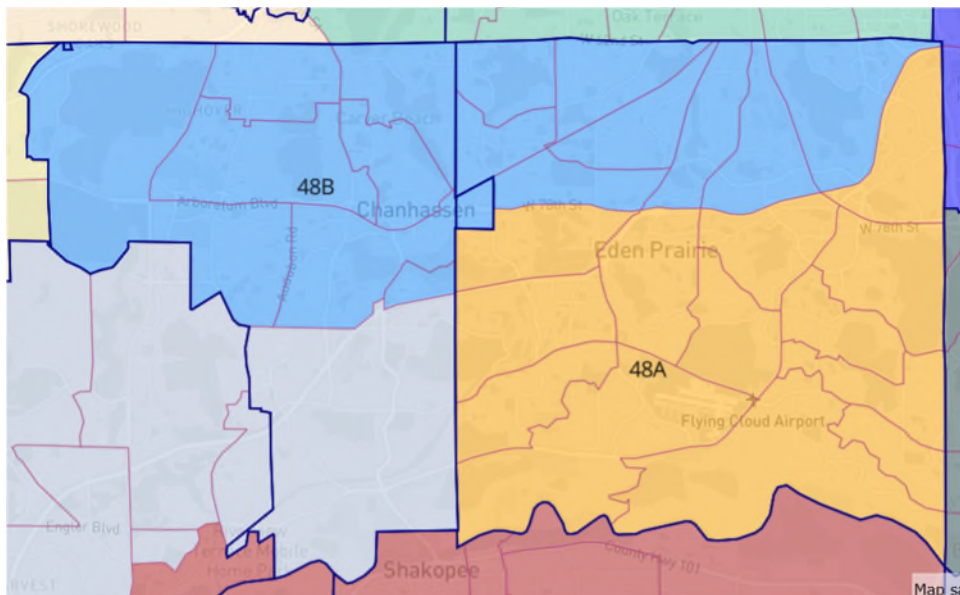
Proposed House District 47A has a total population of 42,537, is located in Ramsey County, and includes areas in southern Shoreview and Arden Hills as well as northeastern portions of Roseville. This district includes Bethel University, a private, evangelical Christian university that enrolls approximately 5600 students. (Bethel University, [https://online.betheluniversity.edu/my/online-degree/.](https://online.betheluniversity.edu/my/online-degree/))

Proposed House District 47B has a total population of 42,798, is also located in Ramsey County, and includes all of Falcon Heights and Lauderdale, along with northwest St. Paul and southwestern Roseville. This is the “State Fair” district, as it includes the

Minnesota State Fairgrounds that are adjacent to the St. Paul campus of the University of Minnesota. The Fairgrounds are a significant economic driver for the area. The population of this district is composed of 70% White/Caucasian, 12.6% Black/African American, 9.9% Asian, 5.3% Latino/Hispanic, 2.2% American Indian/Native American, and 0.2% Pacific Islander.

Proposed House District 47B also includes portions of University Avenue between downtown and the Minneapolis border that are not included in a house district in 64B. This district configuration honors the request of the deaf-blind community cohort near University Avenue that the area be split as little as possible by placing it in only two districts.

Senate District 48; House Districts 48A (orange) and 48B (blue)

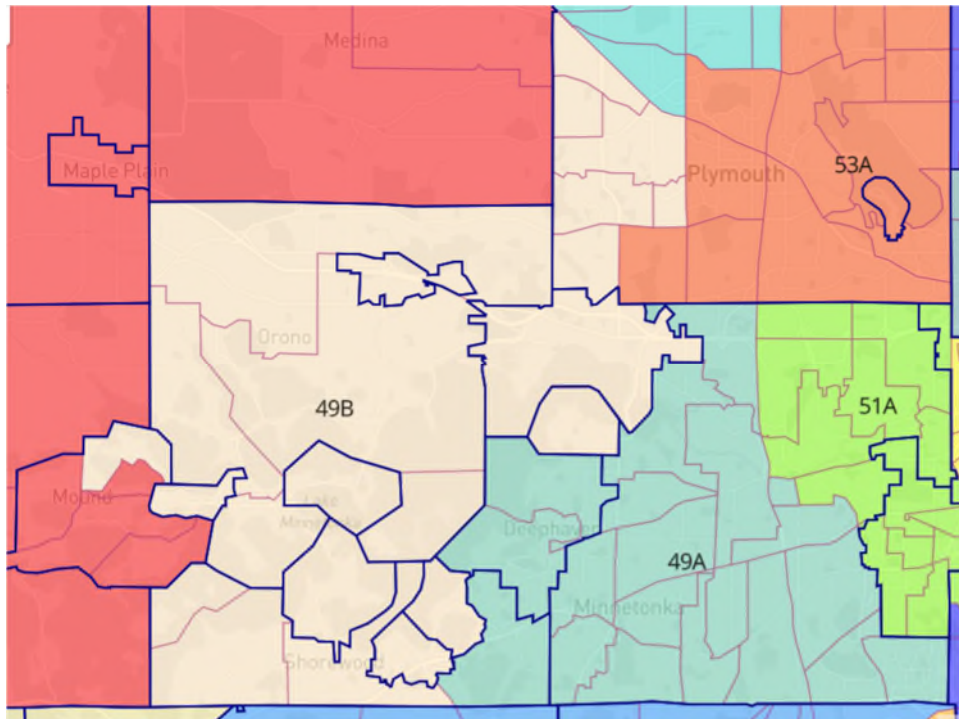


Proposed House District 48A has a total population of 42,750 and includes most of the City of Eden Prairie located south of the Interstate 495 and 78th Street. This district also includes the Flying Cloud Airport, one of six “reliever” airports in the Twin Cities metro

area. The population of this proposed district is composed of 66.8% White/Caucasian, 18.8% Asian, 8.3% Black/African American, 4.7% Latino/Hispanic, 1.2% American Indian/Native American, and 0.1% Pacific Islander.

Proposed House District 48B has a total population of 42,799 and includes northern portions of Eden Prairie and northern Chanhassen.

Senate District 49; House Districts 49A (wintergreen) and 49B (beige)

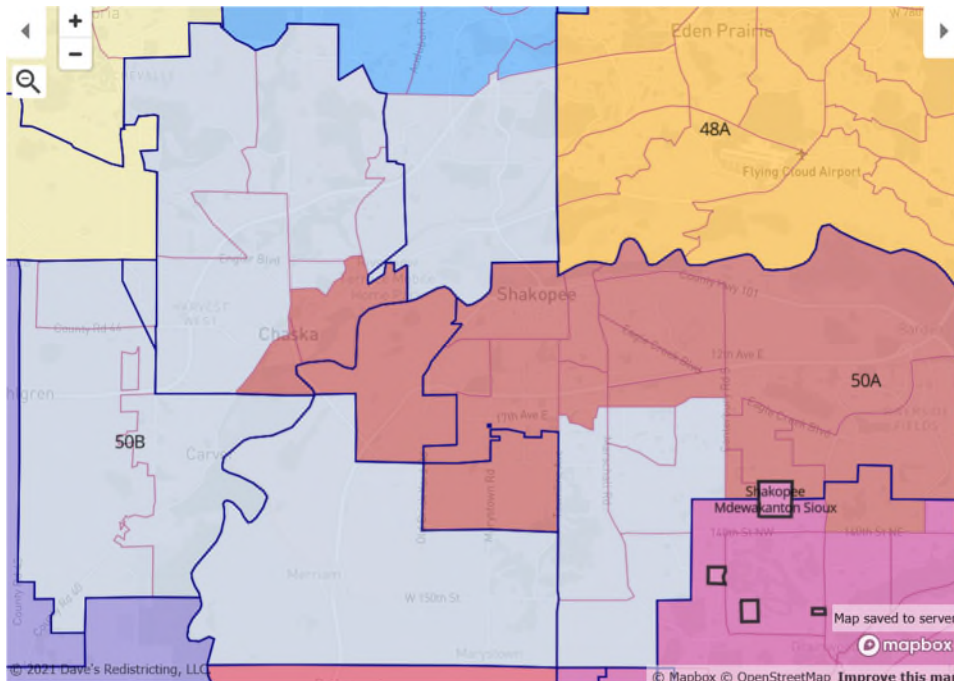


Proposed House District 49A has a total population of 42,689 and includes central and western portions of Minnetonka, all of the City of Deephaven, and southeastern parts of the city of Shorewood.

Proposed House District 49B has a total population of 42,615 and includes the northwestern 2/3 of the City of Shorewood, as well as the cities of Woodland, Long Lake, Wayzata, Greenwood, Excelsior,

Tonka Bay, Minnetonka Beach, southwest Plymouth, Spring Park, and northern Mound.

Senate District 50; House Districts 50A (brown) and 50B (gray)



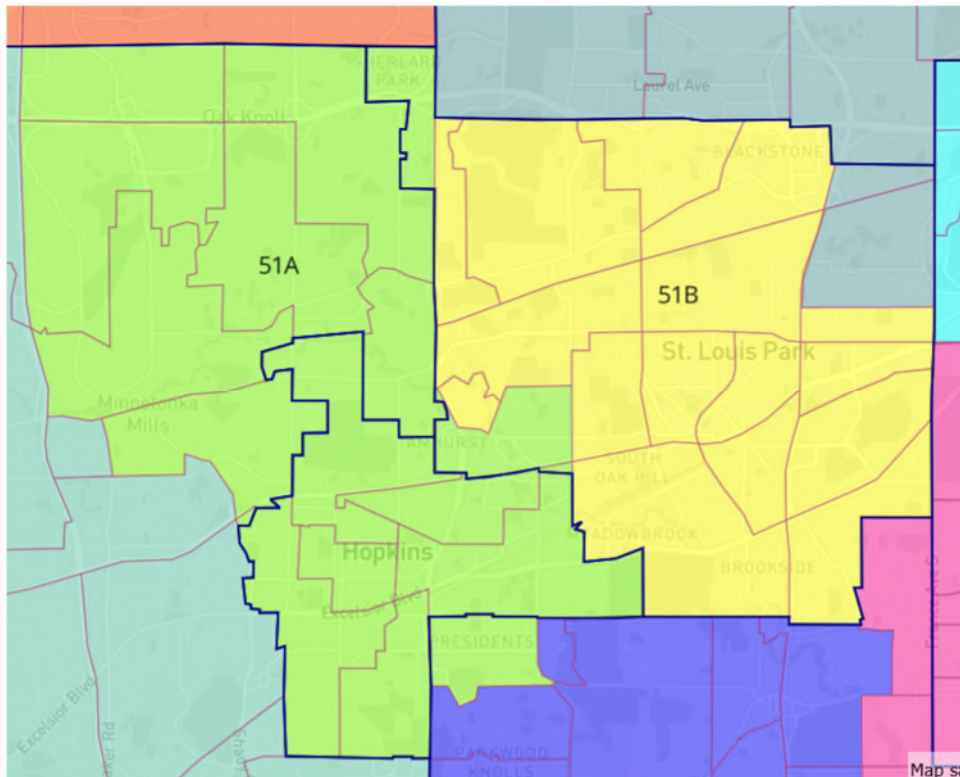
Proposed House District 50A has a total population of 42,597 and keeps whole the Latino/Hispanic communities in Shakopee, Jackson Township, and Chaska, as requested by local Latino/Hispanic community members (*see* Declaration of Melvin Falla (“Falla Declaration”)) and the nonprofit organization Hispanic Advocacy and Community Empowerment through Research (HACER), which provides critical services in this community. Proposed House District 50A connects these communities into a district that would be 60.5% White/Caucasian, 13.3% Latino/Hispanic, 12.3% Black/African American, and 11.2% Asian, 3% American Indian/Native American, and 0.3% Pacific Islander).

Shakopee, Chaska and Jackson Township each have large communities of Latine (self-described) families and younger people who live in places such as Chaska's Walnut Street Apartments (58% Latine), Jackson Township (47% Latine), and Shakopee's Valley Haven Mobile Home Park (87% Latine). Community members are active in schools and collectively seek to improve relations with law enforcement. For instance, in the Shakopee School District, parents formed the Hispanic Advisory Council of Shakopee Parents to address public safety, summer school activities, and ask for the translation of materials to better engage parents. (See Shannon Fiecke, *Shakopee parent group advocates for Hispanic youths*, SHAKOPEE NEWS (Sept. 24, 2014), available at swnewsmedia.com.) In Chaska, the community has worked with the police department to study and remove an officer engaged in racial profiling. (See Adam Uren, *Police expunge 40 traffic tickets after Chaska officer targeted Hispanic Drivers*, BRING ME THE NEWS (Sept. 6, 2018)).

Proposed House District 50B has a total population of 42,624 and includes portions of the cities of Shakopee, Chaska, and Chanhassen, as well as Louisville Township, Carver City, and Dahlgren Township.

Proposed Senate District 50 unites the whole cities of Shakopee, Chaska and Chanhassen, and brings the cultural amenities (stores, parks, cultural centers) into the same district as the residents that use them.

Senate District 51; House Districts 51A (lime green) and 51B (yellow)

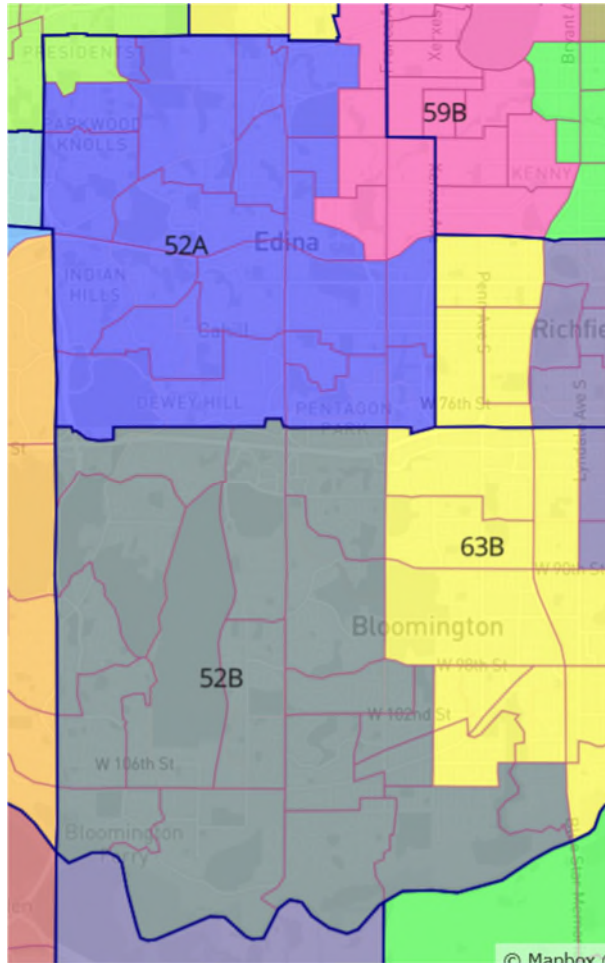


Proposed House District 51A has a total population of 42,684, is located wholly within Hennepin County, and includes the entire city of Hopkins, northeastern Minnetonka, northwestern and southwestern St. Louis Park, and most of northwestern Edina. This population of this district is 14.4% Black/African American, 7.8% Asian, 5.9 Latino/Hispanic, 1.7% American Indian/Native American, and 0.2% Pacific Islander.

Proposed House District 51B has a total population of 42,461, is located wholly within Hennepin County, and includes most of St. Louis Park (except for western and northeastern portions of city).

Proposed Senate District 51 unites most of the Cities of St. Louis Park and Hopkins and sits entirely within Hennepin County.

Senate District 52; House Districts 52A (blue) and 52B (grey)



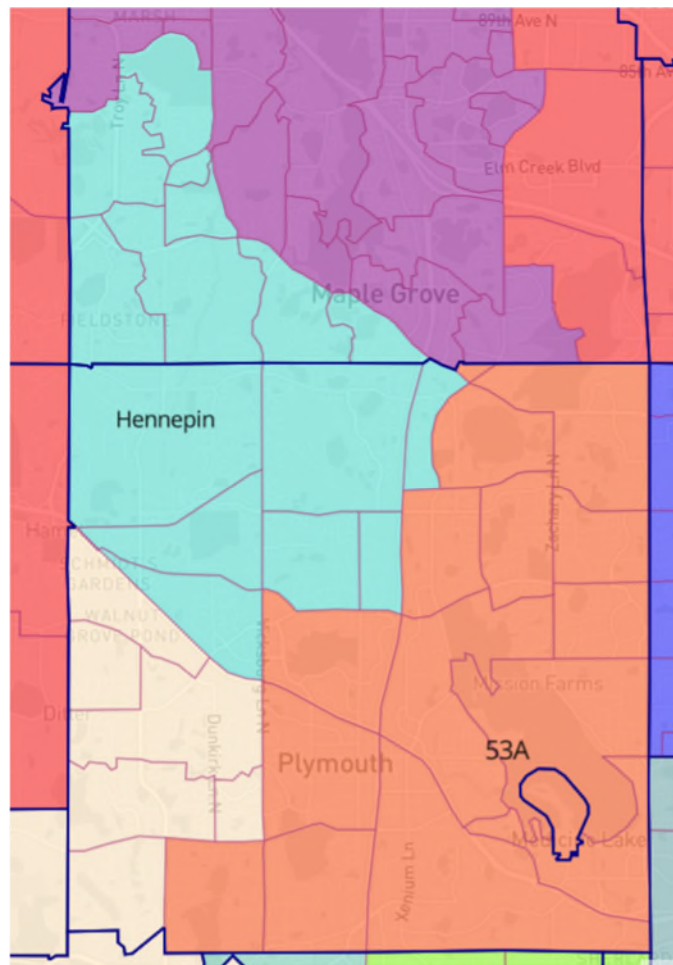
Proposed House District 52A has a total population of 42,375, is located wholly within Hennepin County, and encompasses most of Edina (including the neighborhoods of Cahill, Bredesen Park, Parkwood Knolls, Lake Edina, South Cornelia). Edina—particularly the western portions—has extremely wealthy neighborhoods with million-dollar homes, where more than 75% of the population own their own homes.

Proposed House District 52B has a total population of 42,397, is located wholly within Hennepin County, and includes the western half of the City of Bloomington, split along France Ave., Xerxes Ave., and Blue Star Memorial Hwy. West Bloomington has

particularly wealthy neighborhoods, where homes average \$500,000 and higher. It also includes large recreation areas of Hyland Lake Park Reserve and Normandale Lake Park.

Proposed Senate District 52 unites portions of Edina and Bloomington that are very similar, generally middle to upper middle-income residents, with high percentages of homeownership.

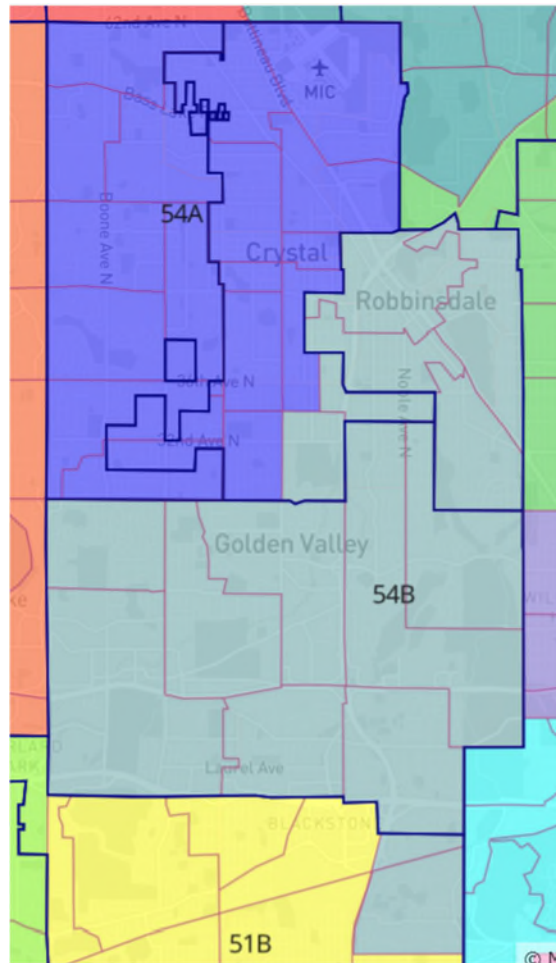
Senate District 53; House Districts 53A (orange) and 53B (teal)



Proposed House District 53A has a total population of 42,433, is located wholly within Hennepin County, and includes the whole City of Medicine Lake and the eastern portion of Plymouth City.

Proposed House District 53B has a total population of 42,668, is located wholly within Hennepin County, and includes the Northwestern portion of Plymouth and the Southwestern portion of Maple Grove. It has a slightly more diverse population than 53A, with a population of 69.8% White/Caucasian, 19.8% Asian, 6.1% Black/African American, 2.9% Latino/Hispanic, 1% American Indian/Native American and 0.1% Pacific Islander.

Senate District 54; House Districts 54A (blue) and 54B (gray/green)

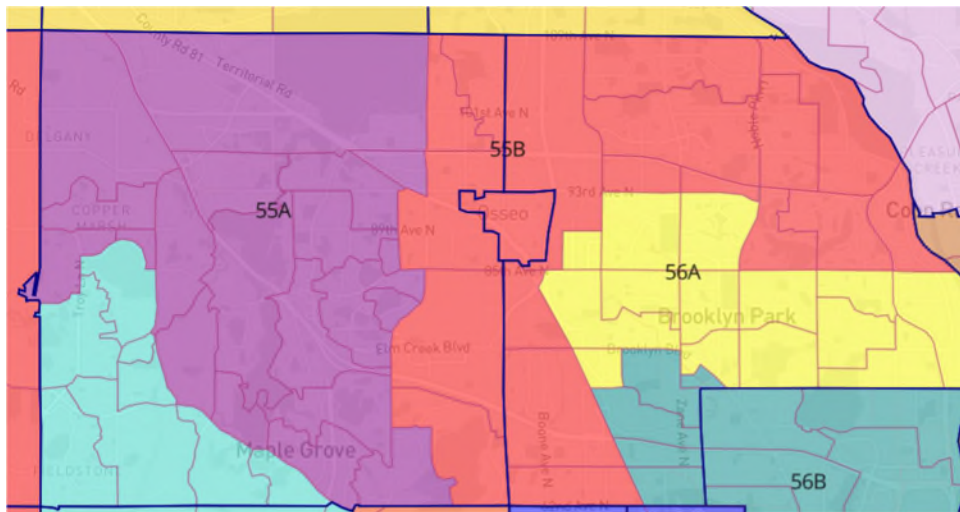


Proposed House District 54A has a total population of 42,570, is located wholly within Hennepin County, and includes the entire City of New Hope and most of Crystal. This district is composed of 62.6% White/Caucasian, 21% Black/African American, 8.3%

Latino/Hispanic, 5.7% Asian, 2.4% American Indian/Native American and 0.1% Pacific Islander.

Proposed House District 54B has a total population of 42,836, is located wholly within Hennepin County, and includes the entire Cities of Golden Valley and Robbinsdale, as well as the south-eastern most portion of Crystal. This district is composed of 75.7% White/Caucasian, 12% Black/African American, 5% Asian, 4.8% Latino/Hispanic, 2.1% American Indian/Native American, and 0.1% Pacific Islander.

Senate District 55; House District 55A (purple) and 55B (red)

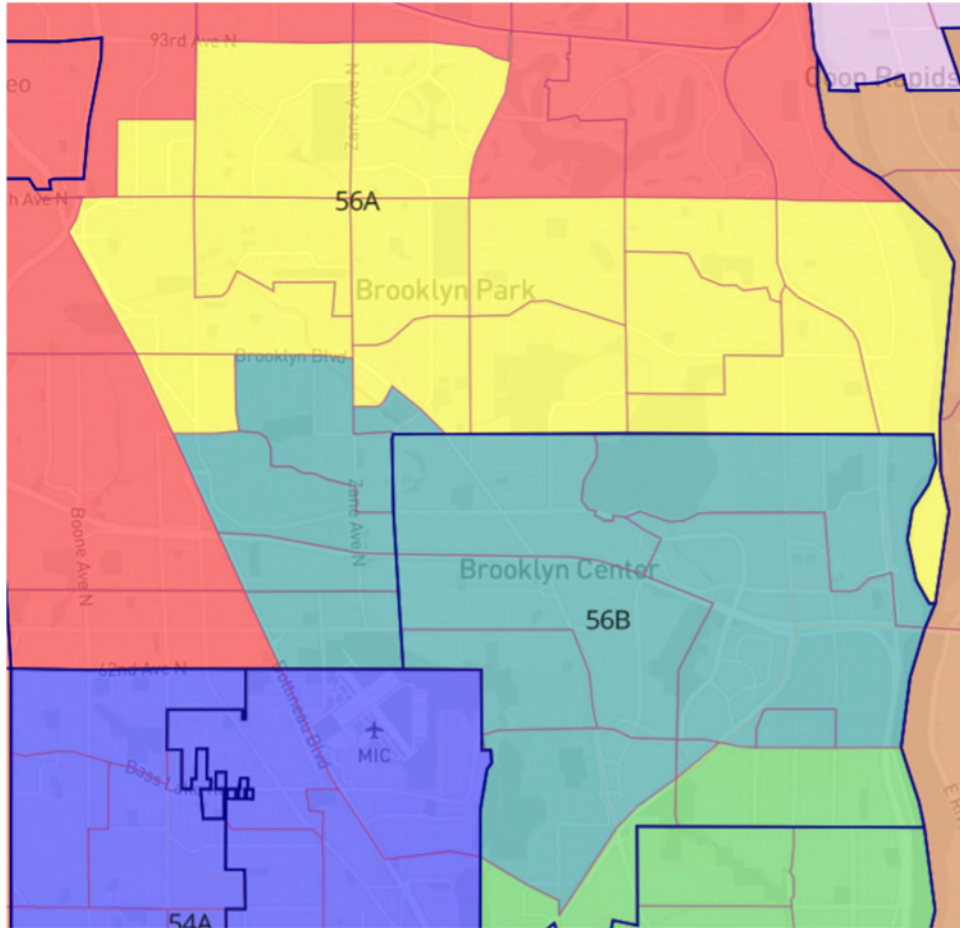


Proposed House District 55A has a total population of 42,589, is located wholly within Hennepin County, and includes most of the city of Maple Grove.

Proposed House District 55B has a total population of 42,622, is located wholly within Hennepin County, and includes whole city of Osseo, the eastern portion of Maple Grove, and the western and northern portions of Brooklyn Park. This district is composed of 63.4% White/Caucasian, 17.5% Black/African American, 13.1% Asian, 1.7% American

Indian/Native American, and 0.2% Pacific Islander. Asian/ Pacific Islander community members requested that the areas north of the border with Brooklyn Park be kept together.

Senate District 56; House District 56A (yellow) and 56B (green)



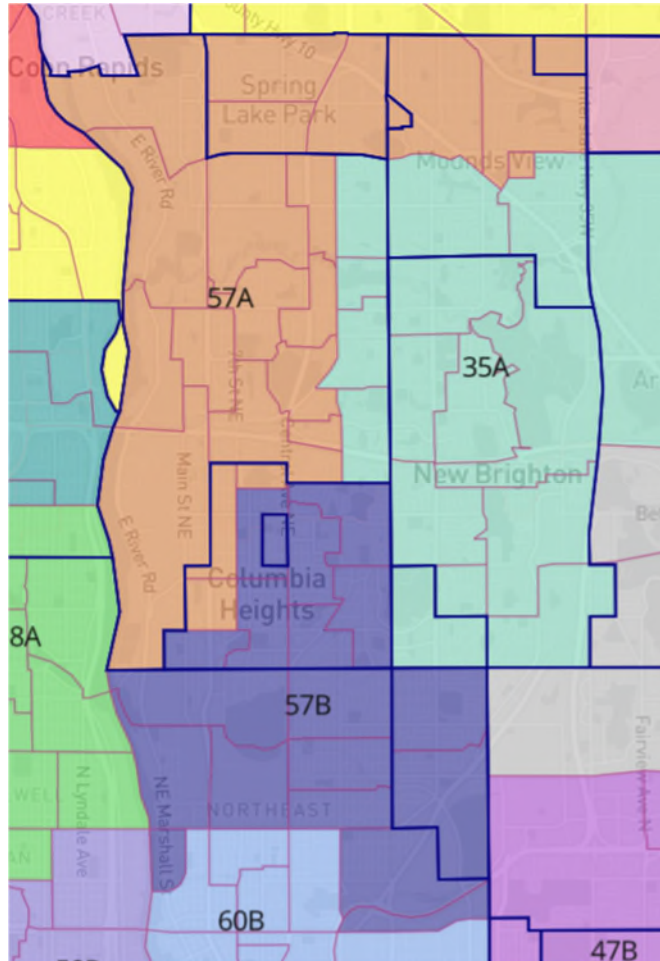
Proposed House District 56A has a total population of 42,689, is located wholly within Hennepin County, and is centered on the suburban city of Brooklyn Park, where one of every five residents was born in another country (see www.BrooklynPark.org). Brooklyn Park is nationally known for its international residents, with large communities of Liberian, Somali, and Nigerian origin. This community is often called “Little Monrovia” because of its significant Liberian population, which has unique issues and needs, including the need to address food security for these communities. (See Declaration

of Nelima Sitati Munene (“Munene Declaration”).) West African and African American community members requested to include the south-central portion of Brooklyn Park in this district. (*Id.*) The district’s population is 33.9% Black/African American, 32.7% White/Caucasian, 24.7% Asian, 1.9% American Indian/Native American, and 0.2% Pacific Islander.

Proposed House District 56B has a total population of 42,556, is located wholly within Hennepin County, and includes the southern portion of Brooklyn Park and most of Brooklyn Center. This district has some of the greatest diversity in all of Minnesota, including communities hailing from East and West Africa, India, Nepal, Myanmar, Bhutan, Thailand, and Burma. (See www.CAPIUSA.org, which opened its Immigrant Opportunity Center in Brooklyn Center 2018 to serve this large and diverse population). Proposed House District 56B is 39% Black/African American and 19% Asian/Pacific Islander.

Proposed Senate District 56 unites the diverse communities within the suburban cities of Brooklyn Park and Brooklyn Center into one district.

Senate District 57; House Districts 57A (brown) and 57B (dark blue)

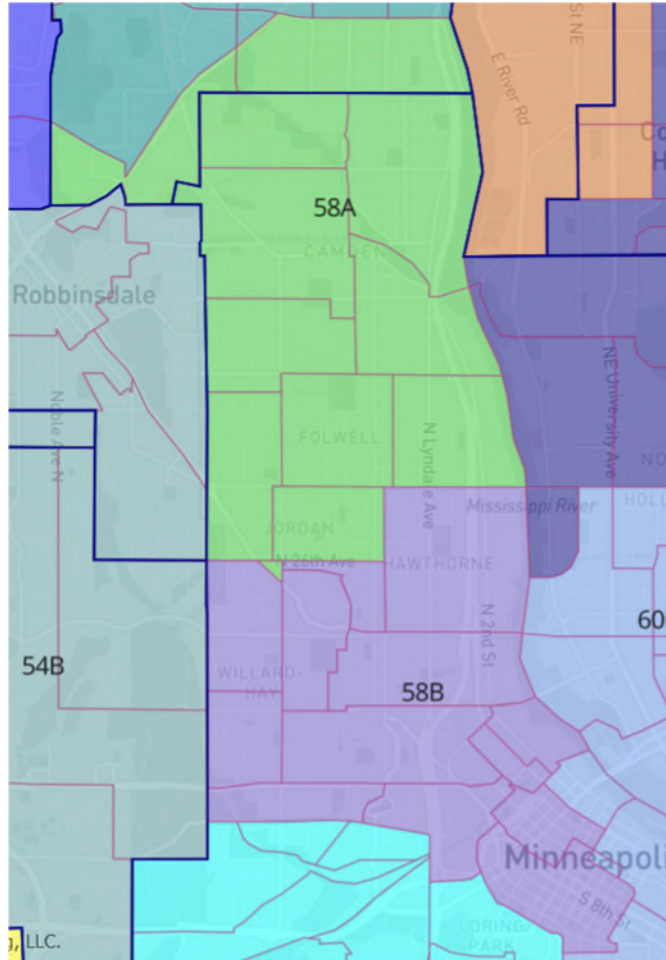


Proposed House District 57A has a total population of 42,646 and includes all of the City of Spring Lake Park, most of Fridley, and the western portion of Columbia Heights. This district is diverse, with 60% White/Caucasian, 18.8% Black/African American, 11% Latino/Hispanic, 7.7% Asian, 3% American Indian/Native American, and 0.2% Pacific Islander.

Proposed House District 57B has a total population of 42,587 and includes all of St. Anthony City and Hilltop, most of Columbia Heights (except the western portion), and the northern part of northeast Minneapolis (Marshall Terrace, Columbia Park, Waite Park, Northeast Park). This district's population is composed of 64.9% White/Caucasian, 15.2%

Black/African American, 11.6% Latino/Hispanic, 5.8% Asian, 3% American Indian/Native American, and 0.1% Pacific Islander.

Senate District 58; House Districts 58A (green) and 58B (purple)



Proposed House District 58A has a total population of 42,443 people, is wholly within Hennepin County, and includes the southern portion of Brooklyn Center and the northwestern part of Minneapolis (Shingle Creek, Lind-Bohanon, Camden, Folwell, Jordan). The population of this district is composed of 39% Black/African American, 33.8% White/Caucasian, 12.4% Latino/Hispanic, 12.4% Asian, 4.9% American Indian/Native American, and 0.2% Pacific Islander.

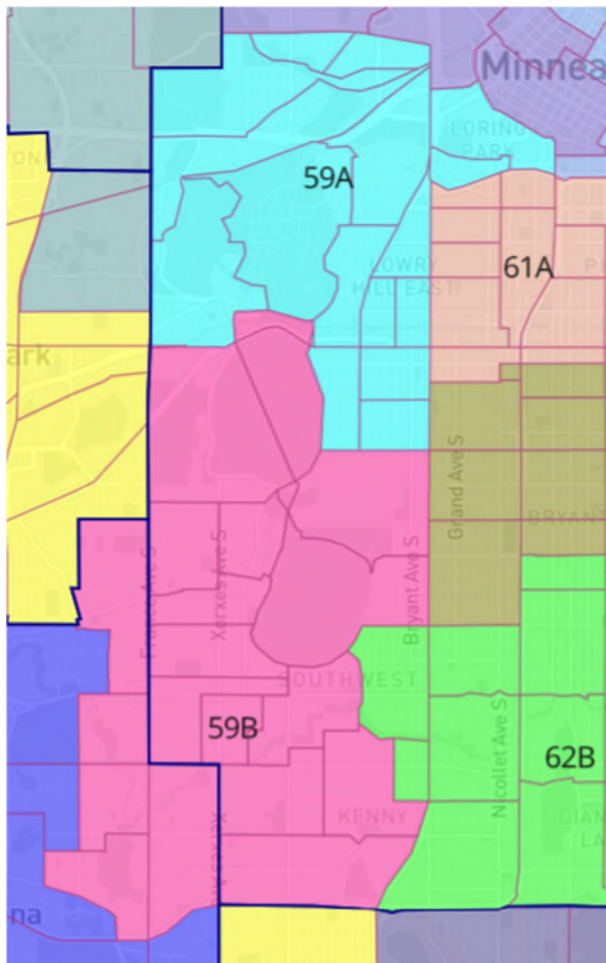
Proposed House District 58B has a total population of 42,487 and encompasses northern Minneapolis, including the neighborhoods of Hawthorne, Near-North, Willard-Hay, Sumner-Glenwood. As a portion of the total population in this proposed district, people of Black/African American descent comprise 45.3%, White/Caucasian 33.8%, Asian 10.7%, Latino/Hispanic 8.7%, and American Indian/Native American 4.0%, Pacific Islander, 0.2%.

This area has a large Black/African American population that is compact and numerous enough to comprise over 50% of the Voting Aged Population (VAP), thereby meeting the first requirement of the Voting Rights Act. The Corrie Plaintiffs propose this configuration of House District 58B in order to hold a diverse community together while enabling the Black/African American residents of North Minneapolis to have an effective vote.

North Minneapolis, also known as the Northside, is known for its vibrant West Broadway farmers market, its arts culture (including the annual FLOW Northside Arts Crawl), and the culture of family-owned small businesses. (*See* Samantha Chaney, *A Closer Look into North Minneapolis*, MEET MINNEAPOLIS (Nov. 18, 2018).) While North Minneapolis is the most diverse area of Minneapolis, its residents are more likely to hold only a high school degree or associate's degree, experience poverty, and experience concerns for personal safety compared to Minneapolis residents as a whole. (*See* Penn Avenue Vision and Framework, 2016 Report, *available at* [pacw-inv-analysis-5-demo-data.pdf](#).)

Recognizing this area as an area of high need, Hennepin County and the City of Minneapolis have created a number of programs centered on this area. For instance, the Penn Avenue community works program, created in 2012, is focused on job creation, livability and economic development along the Penn Avenue corridor. (*See id.*). Other programs centered on servicing this area include the Hennepin County Human Services Hub, the Bottineau and Southwest light rail transit (LRT) lines, and the planning of the Metro Transit C rapid bus line to serve Penn Avenue corridor neighborhoods. (*See Hennepin County, Penn Avenue Community Works, <https://www.hennepin.us/penn>.*)

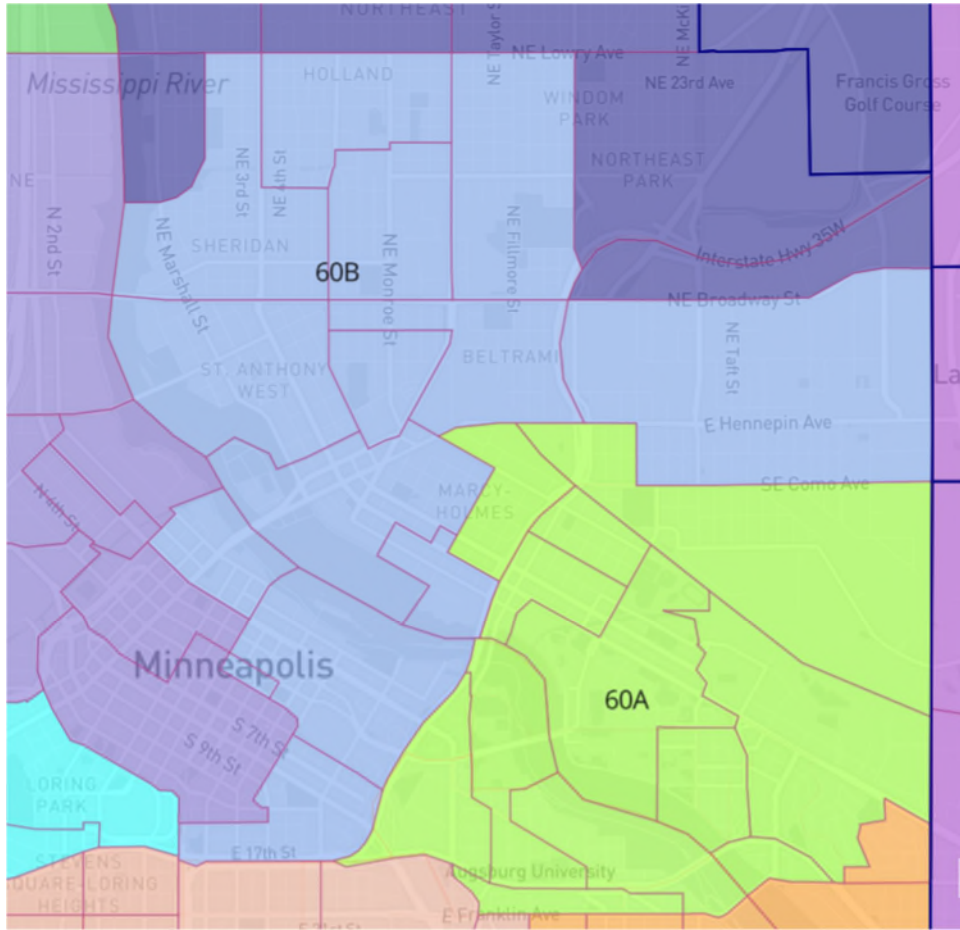
Senate District 59; House Districts 59A (light blue) and 59B (magenta)



Proposed House District 59A has a total population of 42,660 and is located in the center-west area of Minneapolis. This proposed district includes the areas of Bryn Mawr, Loring Park, East Isles, Lowry Hill East, and Carag.

Proposed House District 59B has a total population of 42,652 and encompasses Southwestern Minneapolis, including Lake Bde Maka Ska, Linden Hills, Lake Harriet, East Harriet, Fulton, Armatage, and Kenny, as well as the north-eastern portion of Edina. This proposed district is centered on Lake Bde Maka Ska and surrounding neighborhoods (Bde Maka Ska, translating to White Earth Lake in the Dakota language, became the official name of the lake in 2018 and is the largest lake in the city of Minneapolis, providing park space and recreation area for residents and visitors alike. (*See Bde Maka Ska Park - Minneapolis Park & Recreation Board, available at minneapolisparcs.org.*)

Senate District 60; House Districts 60A (lime green) and 60B (light blue)

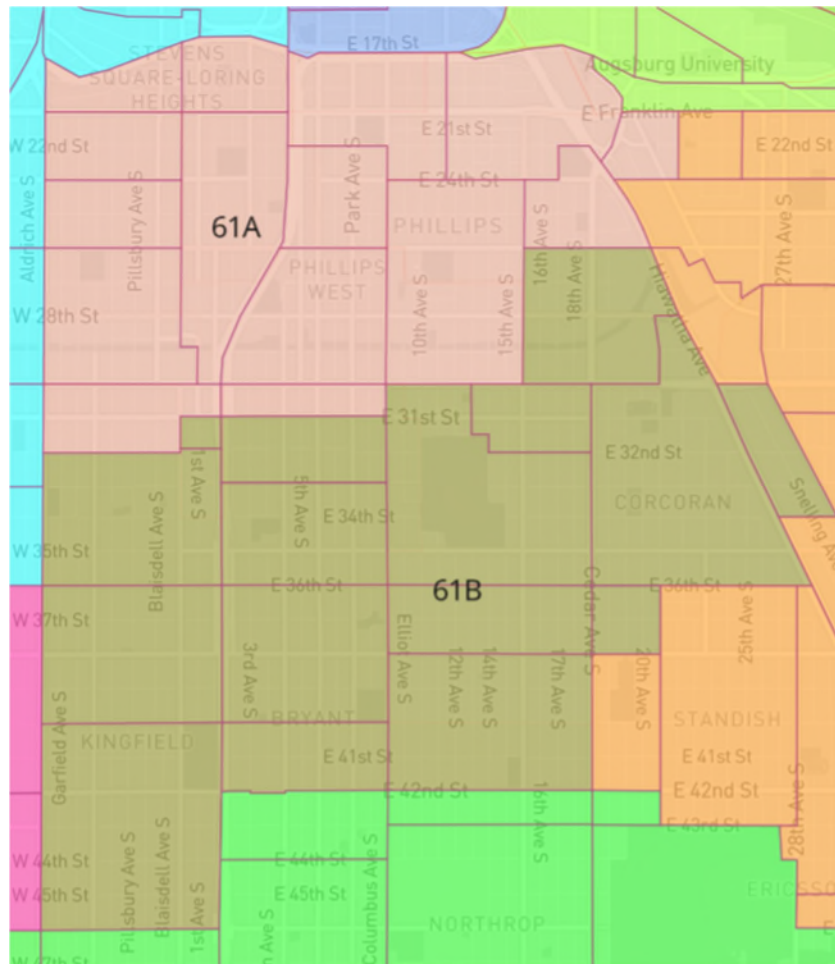


Proposed House District 60A has a total population of 42,744 and encompasses the University of Minnesota and environs in Dinkytown and Cedar-Riverside. The population of the proposed district is 47% BIPOC, 52.7% White/Caucasian, 24.9% Black/African American, 16.5% Asian, 4.8% Latino/Hispanic, 1.5% American Indian/Native American, and 0.1% Pacific Islander. This proposed district would keep together the predominantly East African communities that have been living, working, and flourishing in the Cedar-Riverside area of Minneapolis. Because these East African communities have distinct cultural ties, share community support structures and decision-making processes, and face

common issues, they are a community of interest that should be kept together. (Declaration of Wali Dirie.)

Proposed House District 60B has a total population of 42,470 and encompasses eastern downtown Minneapolis and most of the brewery and artist section of Northeast Minneapolis. The population of the proposed district is 34.5% BIPOC, 65.5% White/Caucasian, 17% Black/African American, 7.8% Latino/Hispanic, 7.2% Asian, 3.1% American Indian/Native American, and 0.2% Pacific Islander.

Senate District 61; House Districts 61A (beige) and 61B (green)



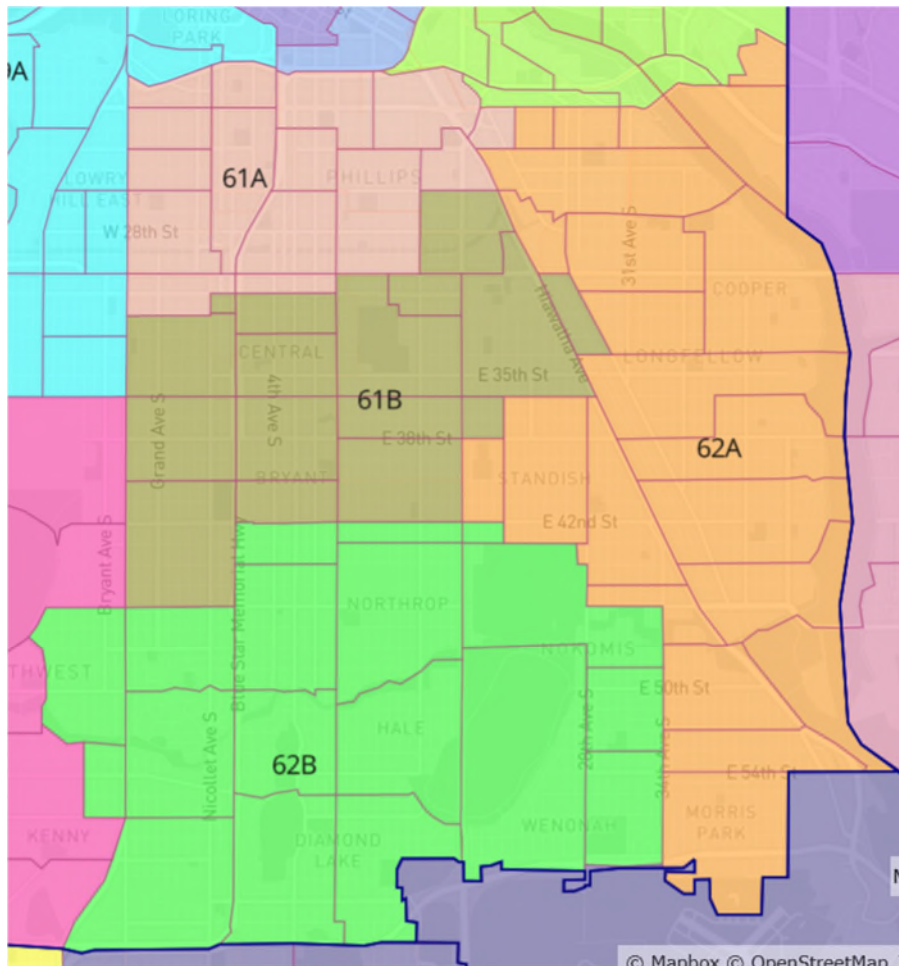
Proposed House District 61A has a total population of 42,704 and encompasses south Minneapolis (just south of Interstate 94), Phillips, Stevens Square, Little Earth, a small

slice of Seward, and the Horn Towers section of Lyndale. This proposed district is comprised of 38% Black/African American, 33.8% White/Caucasian, 19.8% Latino/Hispanic, 7.4% American Indian/Native American, 3.9% Asian, and 0.2% Pacific Islander.

Proposed House District 61B has a total population of 42,592 and encompasses south-central Minneapolis, centering on Powderhorn and east Lake Street. This proposed district is comprised of 49% White/Caucasian, 24.5% Latino/Hispanic, 19.6% Black/African American, 5.1% American Indian/Native American, 4.1% Asian, and 0.2% Pacific Islander.

In Proposed Senate District 61, the ethnic economy is \$859 million and includes the bustling Lake Street with two very large malls – Karmel Mall serving the East African community and Plaza Mexico serving the Latino community. Karmel Mall has one of the largest taxable value per acre – close to \$3 million, larger than many nearby stores like Target. (Corrie Declaration ¶ 8 and 9.)

Senate District 62; House Districts 62A (orange) and 62B (light green)



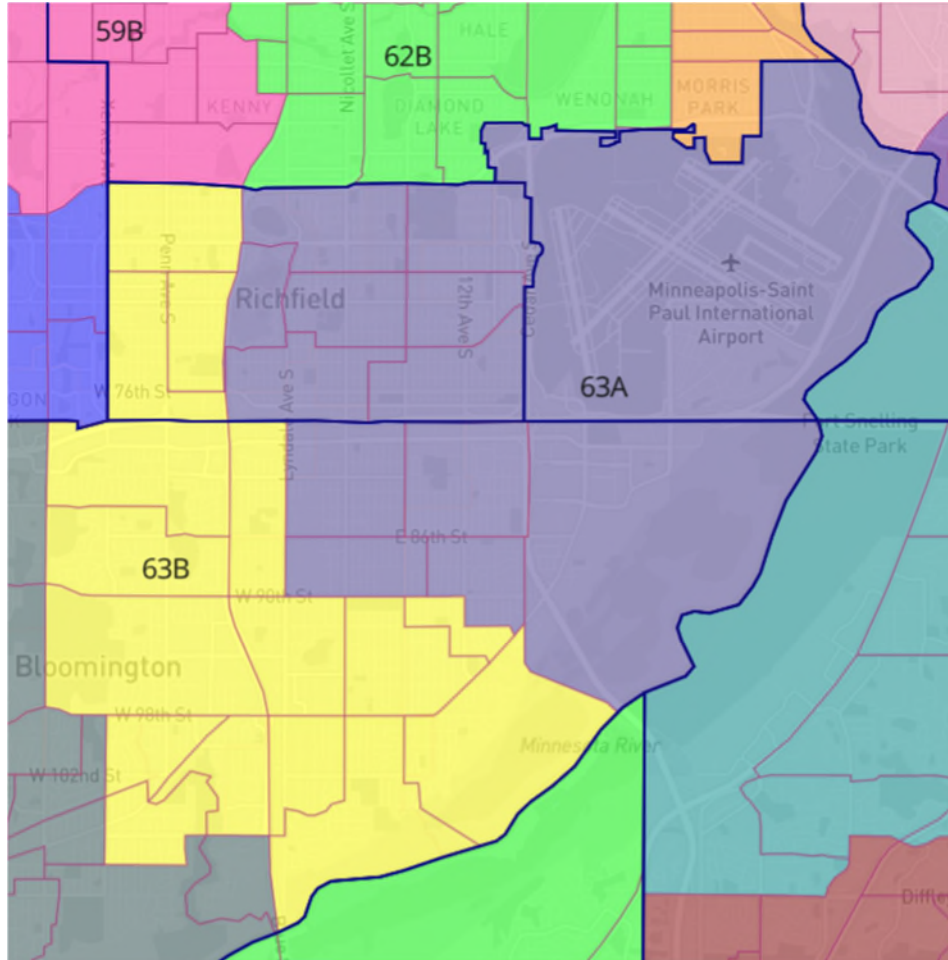
Proposed House District 62A has a total population of 42,425 and encompasses southeastern Minneapolis, centering on the 46th Street train station in the south and the Cooper neighborhood in the north.

Proposed House District 62B has a total population of 42,776 and encompasses south-central Minneapolis, centered on Lake Nokomis in the east, Diamond Lake in the center, and Minnehaha Creek/Lake Harriet on the east.

Proposed Senate District 62 combines two proposed House district seats that are extremely similar demographically, with a total population of 74.4% White/Caucasian,

11.4% Black/African American, 7.7% Latino/Hispanic, 4.1% Asian, 2.3% American Indian/Native American, and 0.2% Pacific Islander.

Senate District 63; House District 63A (bluish purple) and 63B (yellow)

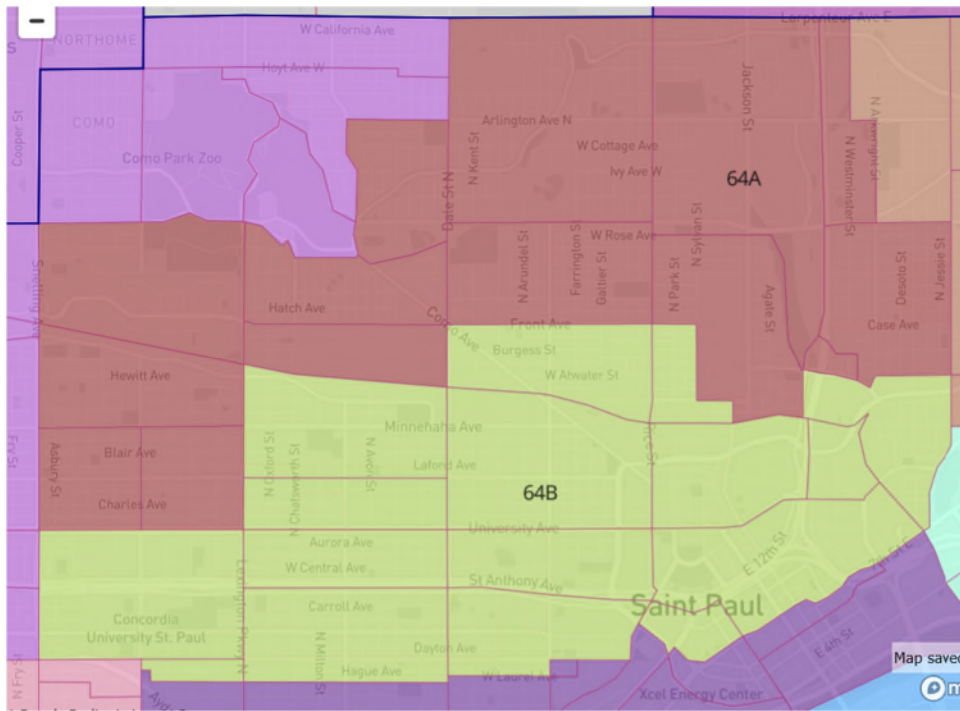


Proposed House District 63A has a total population of 42,426 and encompasses portions of Richfield and Bloomington, based on requests from Latino/Hispanic community leaders and the Hispanic Advocacy and Community Empowerment through Research (HACER) organization. This proposed district connects these communities into a seat that is 52% White/Caucasian, 21.6% Latino/Hispanic, 17.2% Black/African American, 7.2% Asian, 3.4% American Indian/Native American, and 0.3% Pacific Islander. This proposed district also contains economic powerhouses—the Mall of

America and the Minnesota St. Paul Airport—and a tiny slice of Minneapolis that falls south of Interstate 62, aka the Crosstown expressway.

Proposed House District 63B has a total population of 42,725 people and encompasses culturally-important areas in the western side of Richfield and central Bloomington, which are placed in the accompanying house district for the state senate district.

Senate District 64; House Districts 64A (maroon) and 64B (yellow-green)



Proposed House District 64A has a total population of 42,781 and encompasses northern and eastern St Paul, with a population that is 38% White/ Caucasian, 28.4% Asian, 23.5% Black/African American, 8.8% Latino/Hispanic, 3.2% American Indian/Native American and 0.2% Pacific Islander.

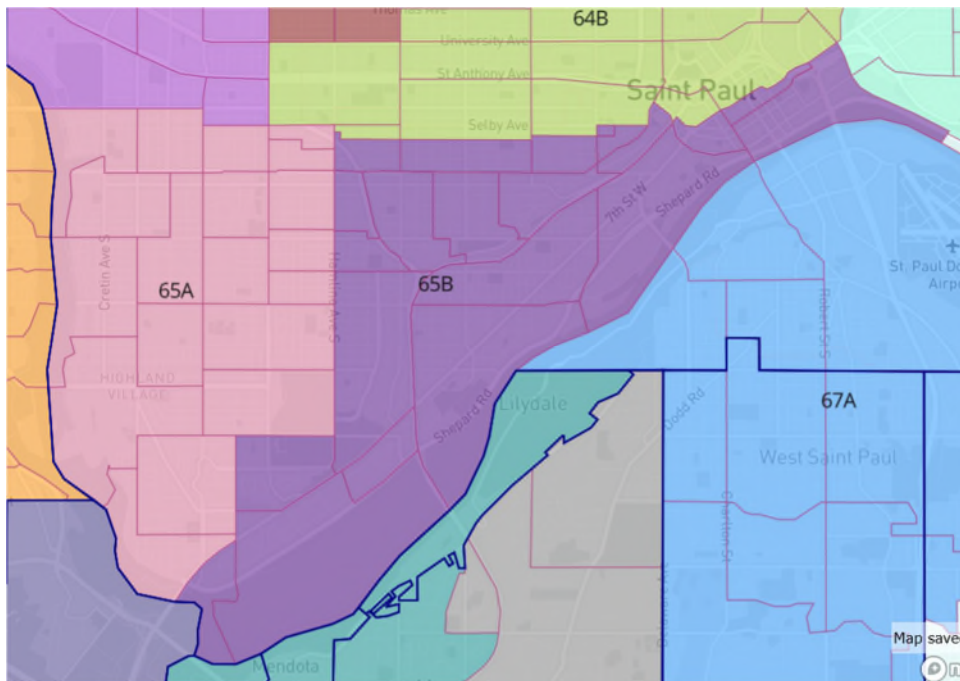
Proposed House District 64B has a total population of 42,479 and unites the neighborhoods of Rondo and Frogtown in St. Paul, based on input from Black/African

American community leaders in central St. Paul (see www.Districtr.org/coi/48597). This proposed district is comprised of 38.8% Black/African American, 31.1% White/Caucasian, 21% Asian, and 8.2% Latino/Hispanic population, 3.2% American Indian/Native American, and 0.2% Pacific Islander.

Proposed Senate District 64 connects a point of cultural interest in Proposed House District 64A (the Como Park Regional Pool) with the with the diverse communities of Rondo and Frogtown in Proposed House District 64B. This district also contains the Capitol Complex.

In addition, most of University Avenue between downtown and the Minneapolis border is placed within this district (the remainder is in proposed HD 47B), which was requested by the deaf-blind community cohort.

Senate District 65; House Districts 65A (pink) and 65B (purple)

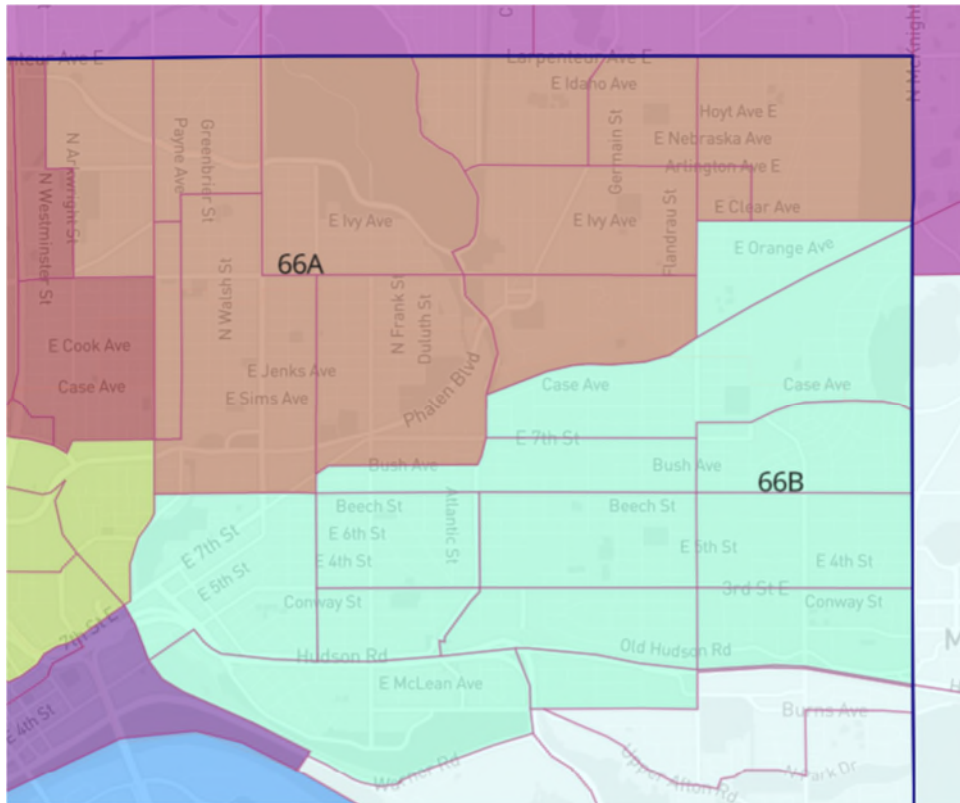


Proposed House District 65A has a total population of 42,546 and encompasses southwestern St. Paul, centered on Highland Park, St. Catherine’s University and Macalester College.

Proposed House District 65B has a total population of 42,482 and encompasses the eastern half of southwestern St. Paul and the southern half of downtown St. Paul.

Proposed Senate District 65 is generally homogenous, encompassing predominantly White/Caucasian neighborhoods, with a populous East African community in the south end on West 7th St.

Senate District 66; House Districts 66A (light brown) and 66B (light green)



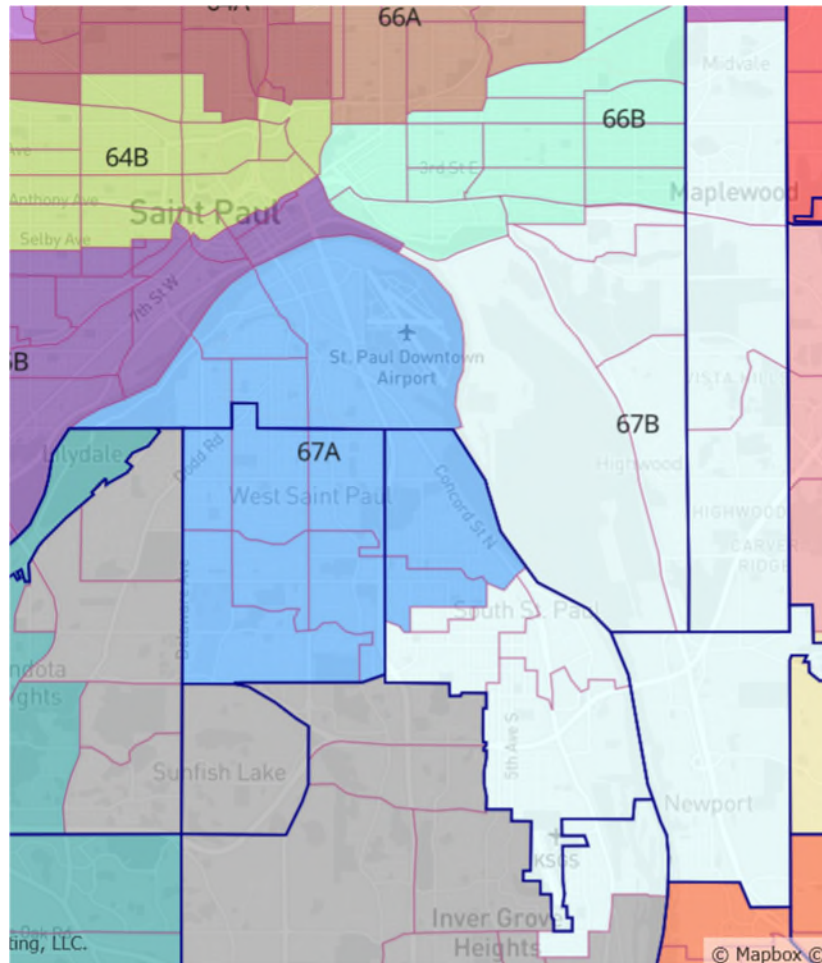
Proposed House District 66A has a total population of 42,720 and encompasses the northeast corner of St. Paul, centered in Lake Phalen. This district has large Asian and Pacific Islander communities, comprising 40.1% and 0.2% of the population, respectively,

with the rest of the population composed of 27.6% White/Caucasian, 18.1% Black/African American, 13.1% Latino/Hispanic population, and 3.2% American Indian/Native American. Lake Phalen is an important recreation and fishing location for Asian American, such as the Hmong and Chinese American community. For instance, the Minnesota Department of Natural Resources' stocked Lake Phalen with white bass based on Hmong community leader input (*see* Vang, Youa, *For many Hmong American anglers in Minnesota, the white bass is a link to their Southeast Asian roots*, www.dnr.state.mn.us/mcvmagazine/issues/2021/sep-oct/bass.html, MY CONSERVATION VOLUNTEER (Sep.-Oct. 2021), and the park features the Minnesota China Friendship Garden and annual Dragonboat races. (*See* chinafriendshipgarden.org.) In addition, the district includes other important community hubs such as the Hmong Village Shopping Center. (*See* weinchina.com, *Saint Paul – Little Mekong*, <https://www.weninchina.com/chinatowns-and-asian-districts/saint-paul-little-mekong>.)

Proposed House District 66B has a total population of 42,431 and encompasses central-eastern St. Paul, centered around East Minnehaha Ave. The district has also has large Asian and Pacific Islander communities, comprising 35.1% and 0.3% of the population, respectively, with the rest of the population composed of 31.1% White/Caucasian, 18.2% Black/African American, 14.5% Latino/Hispanic population, and 3.2% American Indian Native American

Proposed Senate District 66 brings together two areas that are diverse with large Asian/Pacific Islander communities, as requested by Our Maps MN cohorts.

Senate District 67; House Districts 67A (sky blue) and 67B (white)



Proposed House District 67A has a total population of 42,509 and encompasses West St. Paul and South St. Paul. Rather than combining West St. Paul with downtown St. Paul in a shared voting district, input from the Latino/Hispanic community in this area, the non-profit service organization COPAL, and researchers from Hispanic Advocacy and Community Empowerment through Research (HACER) calls for West and South St. Paul to be connected in the same voting district, without the downtown area. The proposed district that connects these communities into a single seat would be 58% White/Caucasian,

21% Latino/Hispanic, 14% Black/African American, 5.3% Asian, 3.8% American Indian/Native American, and 0.2% Pacific Islander.

West St. Paul (20.2%) and South St. Paul (15.5%) have large Latino/Hispanic communities. The West Side of St. Paul is heavily Latino, and it is only part of St. Paul located on the “west” side of the Mississippi River. Community members have expressed a deep and historic connection to communities in West Saint Paul. The commercial district in this community has been dubbed the “District del Sol,” which is home to many iconic Latino-owned businesses that have been operating in this area for generations. The heavily Mexican American communities within this proposed district remains the epicenter of much of Latinx culture in Minnesota. This community should be kept together in Proposed House District 67A. (*See* Declaration of Monica Bryand (“Bryant Declaration.”))

Proposed House District 67B has a total population of 42,679 and contains the southeastern section of St. Paul, southeastern Maplewood, all of South St. Paul and Newport, and a small piece of Inver Grove Heights for population. The population of this proposed district would be 58.3% White/Caucasian, 15.9% Black/African American, 12.7% Asian, 11% Latino/Hispanic, 2.8% American Indian/Native American, and 0.2% Pacific Islander.

(*See also* Erickson Leg. Declaration Ex. G (“Community of Interest Reports”).)

G. Compactness

As a factor subordinate to all other redistricting, districts should be reasonably compact. *See Miller v. Johnson*, 515 U.S. 900, 916 (1995); *Brown v. Thomson*, 462 U.S.

835, 842 (1983). (Principles Order at 7.) As The Corrie Plaintiffs’ legislative plan complies with this principle. (See Erickson Leg. Declaration Ex. F (“Compactness Reports”).)

H. Purpose or Effect of Protecting, Promoting, or Defeating Incumbents, Candidates, or Political Parties.

Districts must not be drawn with the purpose of protecting, promoting, or defeating any incumbent, candidate, or political party. The panel will not draw districts based on the residence of incumbent officeholders and will not consider past election results when drawing districts. (Principles Order at 8.) The Corrie Plaintiffs’ legislative plan complies with this principle because it was drawn in order to comply with the redistricting principles discussed above and in a neutral manner as to incumbents, candidates, and political parties.

V. Conclusion

For the foregoing reasons, the Corrie Plaintiffs respectfully request that this Panel adopt the Corrie Plaintiffs’ Legislative Redistricting Plan.

LATHROP GPM LLP

Dated: December 7, 2021

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Justice*