

**FILED**

December 8, 2021

**OFFICE OF  
APPELLATE COURTS**

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

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

Plaintiffs,

and

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

Plaintiff-Intervenors

**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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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.

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## **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 Plan<sup>1</sup> that is submitted with and further supported by this memorandum and accompanying declarations and reports.

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<sup>1</sup> 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](http://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 8<sup>th</sup> 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:

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