

FILED

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL

December 7, 2021

OFFICE OF
APPELLATE COURTS

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

**AFFIDAVIT OF JOSEPH MANSKY
IN SUPPORT OF THE WATTSON
PLAINTIFFS'
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,

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

VS.

Defendant.

Joseph Mansky, being first duly sworn, deposes and states as follows:

2. I was a member of the Election Division staff in the Office of the Secretary of State for 15 years, serving the last 11 years as Minnesota state election director. I subsequently served as manager of Governor Jesse Ventura's Citizen Advisory

Commission on Redistricting from 2000 to 2002. Most recently, I was the Ramsey County elections manager for 17 years.

3. In my position as Ramsey County elections manager, I was responsible for the preparation of precinct boundary maps for approval by the City of Saint Paul and suburban cities contracting for election services with the Ramsey County Elections Office. I performed this activity in both 2002 and 2012 in the aftermath of the conclusion of the legislative redistricting process.

4. When drafting the plan to create precinct boundaries, I used major physical features clearly identifiable by the voters, such as freeways, arterial streets, railroad tracks and bodies of water to the greatest extent possible.

5. In my experience, approximately 40% of the voters in the City of Saint Paul walked to their polling place on election day. As such, my goal was to create precinct boundaries that eliminated to the greatest extent possible the need for the voters, in particular elderly and disabled voters, from having to cross a freeway, arterial street, railroad track or major body of water in order to reach their polling place.

6. To maintain the integrity of the communities of interest in the City of Saint Paul, I sought to the greatest extent possible to create precinct boundaries that were coterminous with the 17 district council boundaries, which define Saint Paul's neighborhoods.

7. In my position as elections manager, I also designated the polling place location assigned to each precinct for authorization by the Saint Paul city council and the councils of the suburban cities contracting with the Elections Office. I performed this

activity in 2002, 2011 and 2012 as part of the redistricting process.

8. Each election precinct created under the provisions of Minn. Stat. 204B.14 has established, on a one-to-one basis, a polling place for use by the voters residing in that precinct. Minn. Stat. 204B.16.

9. Every time that a new precinct is created, a new polling place corresponding to that precinct must also be designated.

10. Every polling place must be furnished with an optical scan voting system and an accessible ballot marking device. Minn. Stat. 204B.18. In addition, most polling places – especially in the metropolitan area – also are furnished with electronic pollbooks. Minn. Stat. 201.225.

11. In my experience with Ramsey County, the fixed cost of establishing each additional polling place resulting from redistricting is approximately \$10,000.

12. Newly established polling places resulting from the establishment of precincts created to accommodate the results of legislative redistricting also incur additional fixed and variable costs for the entire ten-year period that they are in use by the voters. These additional costs include salaries of election judges, transportation of voting equipment and supplies, ballot programming and voting equipment testing. These costs typically amount to several thousand dollars over ten years.

13. A redistricting process that does not use existing precinct boundaries as a base often results in the creation of new precincts comprising marginal territory resulting from the legal requirements to use district boundaries as precinct boundaries. Two such precincts are in the City of Saint Paul: W1 P12 and W6 P7. Both are underpopulated

precincts squeezed between district boundaries. Such precincts unnecessarily create both financial tails and additional administrative duties for the Elections Office.

14. In my experience, voters identify with the polling place in which they are assigned to vote. Changes to polling place locations, like those resulting from the local implementation of the legislative redistricting process, invariably create confusion among some voters. To the extent that polling place locations – and the precincts to which they have a legal nexus – remain stable, this is to the advantage of the voters affected.

Consistent with Minnesota Statute § 358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: December 5, 2021

/s/ Joseph Mansky
Joseph Mansky

Washington County, Minnesota
County and state signed