

FILED

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

December 8, 2021

**OFFICE OF
APPELLATE COURTS**

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

Plaintiffs,

and

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

Plaintiff-Intervenors

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

vs.

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

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, Dr. Bruce Corrie, declare as follows:

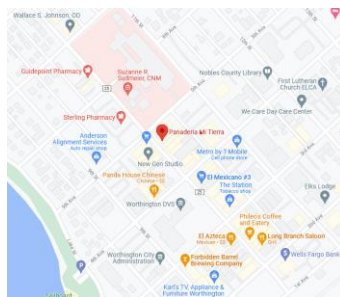
1. I am an immigrant Professor of Economics at Concordia University in Saint Paul, Minnesota. For over 25 years, I have conducted research on the economic contributions of the ethnic marginalized communities of Minnesota.
2. The ALANA (African Latino Asian and Native American) ethnic economy in Minnesota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

economic mass to facilitate economic growth (assuming political alignment and responsiveness) in the form of new or larger grocery stores, hair salons, retail stores, travel agencies, tax preparers, realtors, financial, legal and business services. These ethnic businesses also tend to employ ethnic workers and help the non-ethnic businesses with the goods and services they purchase. For example, through a detailed study in 2015, [*The Economic Potential of African Immigrants in Minnesota*](#), and new projected estimates for 2021 reveal that African immigrants spend \$767 million at ethnic stores and \$2.1 billion in mainstream stores annually in Minnesota. By growing the local ethnic economy, the economy of the entire district grows. Adequate political representation of ethnic groups is important in making this happen.

5. Our proposed redistricting plan also accounted for other ethnic economic factors, such as the presence of commercial corridors within a given district, because many ethnic businesses are located along these corridors. For example, [Willmar](#) is included in proposed House District 18B and has an estimated ethnic economy of \$190 million. A section of Litchfield Avenue in Willmar has many ethnic businesses located on and around the avenue, including a mini mall, Midtown Plaza (313 Litchfield Ave).



6. Similarly, our proposed House District 22A includes the towns of [Worthington](#), [Windom](#), and Mountain Lake, which have \$259 million ethnic economy. In these areas, it is not only ethnic businesses but also ethnic workers in agriculture and food processing that keep the local economy vibrant. Around the intersection of Highway 25 and 5th Avenue in Worthington provides a good snapshot of the local ethnic economy around a busy commercial corridor:



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



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

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

Dated: December 7, 2021

A handwritten signature in black ink, appearing to read "Dr. Corrie", with a horizontal line underneath.

Dr. Bruce Corrie

EXHIBIT A – Proposed Senate District Ethnic Economies

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

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

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

EXHIBIT B – Proposed House District Ethnic Economies

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

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

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

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

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