

**FILED**

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

December 17, 2021

**OFFICE OF  
APPELLATE COURTS**

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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'  
RESPONSE TO THE PARTIES'  
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

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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’ Redistricting Plans focus on preserving communities of interest—including BIPOC communities of interest—throughout Minnesota, wherever possible, and consistent with other redistricting principles. At this juncture in our state’s history—on the heels of 10 years of explosive population growth amongst Minnesota’s BIPOC communities, and with communities of color continually left behind by almost any economic measure—this focus is appropriate and entirely necessary. Our representative government can and should reflect and be responsive to the communities they are elected to serve. Minnesotans of color can and should be able to elect representatives who look like them, who come from their communities, and who know and can relate to their communities.

The Panel need not start with the plans adopted by the *Hippert* Panel and tinker with them to satisfy the Constitutional and state population requirements. Instead, in order to meet the moment, the Panel should start fresh. The Panel has already rejected the “least

change” approach advocated by certain parties, which means the Panel need not be constrained by boundaries drawn by predecessor panels decades ago. In fact, given that the tremendous growth of populations in Minnesota is not evenly distributed, drawing new boundaries that reflect not only where an increasingly diverse Minnesota is today, but where an even more diverse Minnesota is expected to be in the future, is absolutely necessary.

The Panel’s redistricting principles and criteria, many of which are enshrined in the Constitution, should guide the creation of redistricting maps (as it did in the Corrie Plaintiffs’ maps). In addition to the constitutional requirement of equal population, the Panel rightly identified additional mapping criteria it would consider, including:

- Avoiding the abridgement of voting rights based on race, ethnicity or membership in a language minority group;
- Protecting the voting opportunities of racial, ethnic, or language minorities to participate in the political process or elect candidates of their choice alone or in alliance with others;
- Minimizing the division of American Indian reservation lands; and
- Preserving communities of people with shared interests whenever possible in compliance with preceding interests.

Separately, each of these mapping criteria is critical to creating fair and equitable redistricting maps. Taken together, these mapping criteria signal a clear commitment to ensuring that every Minnesotan voice is heard and represented by elected officials, including those who have been traditionally marginalized. Additional important criteria include: creating districts with convenient, contiguous territory; avoiding the division of political subdivisions more than necessary. The Panel recognized compactness as a subordinate mapping criteria.

The Panel’s final, and perhaps most groundbreaking, principle states that “districts must not be drawn with the purpose of protecting, promoting or defeating any incumbent, candidate, or political party.” The Panel further states that it “will not draw districts based on the residents of incumbent officeholders” or “past election results.” (Order Stating Preliminary Conclusions, Redistricting Principles, and Requirements for Plan Submissions (“Principles Order”) at 9). In applying these criteria and making decisions, there may be instances where there is more than one configuration that satisfies these major principles. Some parties might assert that it would be appropriate to consider options that offer greater incumbent protection or partisan advantage. The Panel, however, should choose map configurations that offer voting opportunities for racial, ethnic, or language minorities and historically marginalized communities of interest consistent with the 14<sup>th</sup> and 15<sup>th</sup> Amendments to the U.S. Constitution and the Voting Rights Act. The Corrie Plaintiffs’ Redistricting Plans do just that. The Corrie Plaintiffs respectfully request that the Panel adopt their Congressional and Legislative Redistricting Plans.

## **II. Approaches to Redistricting**

### ***The Wattson Plaintiffs***

The Wattson Plaintiffs’ Redistricting Plans were drawn entirely by one person (Mr. Wattson) who: (1) unabashedly took a “least change” approach in drawing the maps; (2) admittedly attempted to make as few changes as possible to the maps adopted by the *Hippert* Panel ten years ago; and (3) repeatedly took pains to identify the residence of incumbents to ensure each would be protected. Mr. Wattson wants the Panel to believe that “[u]sing a least-change approach will prevent sweeping changes that will disrupt local

communities and avoid negative effects on minority representation or partisan representation.” (Wattson Redistricting Memo at 9.) He also argues that least-change is a legitimate state policy because the *Hippert* Panel made reference to it ten years ago. Notably, however, Wattson ignores this Panel’s decision to reject the least-change approach as a redistricting principle. In fact, in the Principles Order, the Panel explained that if **“called upon to draw new districts, [it] will do so solely through application of [the Panel’s] stated neutral redistricting principles.”** (Principles Order at 17.) The Panel issued this directive after considering the parties’ October briefs and the November oral argument at which some of the parties argued in favor the least change approach. Put another way, the Panel rejected “least change” as a Redistricting Principle. Accordingly, the Wattson Plaintiffs’ Redistricting Plans Maps should be viewed as suspect for unerringly pushing an approach that this Panel rejected.

More importantly, the Panel explicitly adopted the principle of political fairness in forbidding maps that seek to protect incumbents and banning consideration of incumbent addresses. In stark contrast to the Panel’s directive, the Wattson brief makes clear that its maps were created to ensure each incumbent is protected and unabashedly describes how districts were created based on where incumbents live and how to solidify their votes. Given the Wattson Maps explicit defiance of the Panel’s clearly stated principles, the Court should reject the Wattson Plaintiffs’ Redistricting Plans.

### *The Anderson Plaintiffs*

The Anderson Plaintiffs focused on advancing partisan interests; specifically, Republican party advantage (which the Panel has explicitly banned), (*see* Principles Order at 8), and making minimal changes to the current maps, to the detriment of minority voters and BIPOC communities of interest. More specifically, like the Wattson Plaintiffs, the Anderson Redistricting Plans, pursue a “least change” approach. In their Congressional Plan, the Anderson Plaintiffs admit starting with the *Hippert* maps and making adjustments only to preserve political subdivisions and meet population equality requirements. (Anderson Cong. Memo at 1-3.) In doing so, they downplay the substantial shift in population and demographic change experienced in Minnesota over the last 10 years (*see* Anderson Congressional Memo at 1-2), and they sacrifice the rights and interests of minority voters and BIPOC communities of interest that have driven population growth in Minnesota. Similarly, the Anderson Legislative Plans start with the 2011 maps and adjust for population equality, making slight changes to advantage Republicans.

On communities of interest, the Anderson Plaintiffs remain dismissive—as they were in their briefs on the redistricting principles—suggesting that identifying such communities can be “difficult to discern” if they are anything but a previously recognized political subdivision. (Anderson Leg. Memo at 33.) Their report on “Communities of Interest” essentially reduces the preservation of communities of interest to maintaining American Indian reservation boundaries. But with no real input from any of these communities. And even this minimal compliance is flimsy—the Red Lake Indian Reservation and White Earth Indian Reservation are separated from Leech Lake and other

Indian Reservations, and there is no effort to minimize the division of non-contiguous reservation or trust lands.

Communities of Interest, including BIPOC communities of interest, are not difficult to discern. If the Anderson plaintiffs had attempted to engage them or simply taken heed of public testimony, as the Corrie Plaintiffs and their coalition partners have done. Had the Anderson Plaintiffs engaged in this effort, they would have been able to create more minority voting opportunity districts and preserve BIPOC and other communities of interests, without sacrificing in other areas. Anecdotally, the Anderson Plaintiffs also would have discovered that many BIPOC communities throughout the state provided a detailed record of testimony (and even map shape files) documenting where there were shared interests, history, and representation needs that could be addressed with opportunity voting districts that allow their voices to be heard and elected officials to be more responsive to those interests. For these reasons, the Panel should view as suspect the Anderson Maps.

### ***The Sachs Plaintiffs***

Like the Wattson Plaintiffs and Anderson Plaintiffs, the Sachs plaintiffs used the maps that were adopted 10 years ago in *Hippert* as their “baseline” or “starting point” and made adjustments from there to achieve population equality. Unlike the Wattson Plaintiffs and Anderson Plaintiffs, however, the Sachs Plaintiffs took public testimony into account and made changes to features of existing districts that have not worked or no longer make sense in light of demographic, economic, or other developments. (Sachs Leg. Memo at 1; Sachs Cong. Memo at 1, 15.) In addition, the Sachs Plaintiffs Redistricting Plan recognizes

important communities of interest, including, but not limited to, St. Cloud students, the Latino community in Worthington, the Latino community in Albert-Lea, and the Latino community in Austin.

**II. Response to Congressional and Legislative Redistricting Plans**

**A. Ideal Population**

The Corrie Plaintiffs’ Redistricting Plan complies with the Ideal Population Principle, while at the same time preserving and protecting communities of interest, American Indian reservations, and minority voting rights.

The Corrie Plaintiffs Redistricting Plan complies with the ideal population principle outlined by the Panel which provides that “the congressional districts must be as nearly equal in population **as is practicable.**” (Principles Order at 5 (emphasis added).) More specifically, the Corrie Plaintiffs’ Congressional Redistricting Plan shows a total deviation of 54 or 0.01%, with the largest congressional district consisting of 713,341 people and the smallest congressional district consisting of 713,287 people—well within the acceptable range.

Ideal Population: Congress

| <b>Congressional District</b> | <b>Population</b> | <b>Deviation</b> | <b>Percent Deviation</b> |
|-------------------------------|-------------------|------------------|--------------------------|
| 1                             | 713,315           | 3                | 0.000004%                |
| 2                             | 713,316           | 4                | 0.000006%                |
| 3                             | 713,311           | -1               | 0.000001%                |
| 4                             | 713,299           | -13              | 0.000018%                |
| 5                             | 713,291           | -21              | 0.000029%                |
| 6                             | 713,334           | 22               | 0.000031%                |
| 7                             | 713,287           | -25              | 0.000035%                |
| 8                             | 713,341           | 29               | 0.000041%                |

The Corrie Plaintiffs Congressional Plan deviated minimally from the ideal district population in order to satisfy the other redistricting principles, including preserving political subdivisions, protecting communities of interest, and preserving American Indian reservations. Because the Panel’s Principles Order provides some flexibility on district population stating that “[t]o afford each person equal representation, the congressional districts must be as **nearly equal in population as practicable**”, the Corrie Plaintiffs understood this Principle to mean that minimal deviation was permissible. (Principles Order at 5 (emphasis added).) In short, the Corrie Plaintiffs chose to balance the principles—as permitted by the Panel’s Order—and, as such, the resulting Congressional Plan does not sacrifice the political subdivision, community of interest, or American Indian Reservation, principles in favor of the ideal population principle.

Nonetheless, Corrie Plaintiffs are cognizant that the Panel may place a primacy on the equal population requirement. As such, we offer adjustments to our congressional plan that may sacrifice the other principles a bit more, but achieves near perfect ideal population. (See Declaration of Amy Erickson in Support of the Corrie Plaintiffs’ Response to the Parties’ Congressional and Legislative Plans (“Erickson Response Decl.”) ¶ 12 Ex. H.)

The Corrie Plaintiffs Legislative Redistricting Plan also complies with the ideal population principle and does so with metrics that are far better than the other parties, scoring deviation numbers that are lower than any plans (i.e., the lower the deviation score, the closer to the ideal number of residents a map is). For the Senate, the Corrie Plaintiffs’ total population deviation is only 0.91% and the relative mean deviation is 0.15%. For the House, the total population deviation is 1.12%, and the relative mean deviation is 0.24%.

In contrast, the Anderson Plaintiffs’ total population deviation is 1.9% for the Senate and 1.98% for the House, with a mean deviation of 0.45% for the Senate and 0.56% for the House. The Wattson Plaintiffs’ total population deviation is 3.83% for the Senate and 3.96% for the House, with a mean deviation of 0.77% for the Senate and 0.99% for the House. The Sachs Plaintiffs’ total population deviation is 1.95% for the Senate and 1.98% for the House, with a mean deviation of 0.42% for the Senate and 0.56% for the House.

Ideal Population: Minnesota Legislature

|               | CONGRESS        |                | SENATE          |                | HOUSE           |                |
|---------------|-----------------|----------------|-----------------|----------------|-----------------|----------------|
| PLAN          | Total Deviation | Mean Deviation | Total Deviation | Mean Deviation | Total Deviation | Mean Deviation |
| <b>Watts.</b> | 0.00%           | 0.00%          | 3.83%           | 0.77%          | 3.96%           | 0.99%          |
| <b>Ander.</b> | 0.00%           | 0.00%          | 1.90%           | 0.45%          | 1.98%           | 0.56%          |
| <b>Sachs</b>  | 0.00%           | 0.00%          | 1.95%           | 0.42%          | 1.98%           | 0.56%          |
| <b>Corrie</b> | <b>0.01%</b>    | <b>0.00%</b>   | <b>0.91%</b>    | <b>0.15%</b>   | <b>1.12%</b>    | <b>0.24%</b>   |

**B. Minority Voting Rights**

The Corrie Plaintiffs’ Congressional and Legislative Redistricting Plans compare favorably to the other parties’ plans on the minority voting rights principle. For example, the Corrie Plaintiff’s Senate map has 10 districts with 30% or greater minority voting-age population. The Wattson Plaintiffs have the same (10), but the Sachs Plaintiffs and Anderson Plaintiffs have only 9 such districts.

The Corrie Plaintiffs Senate map also creates 5 districts which combine two or more minority groups to be the majority of the voting-age population—more than any of the other parties. The Sachs Plaintiffs’ Senate map creates 3 such districts, and the Anderson Plaintiffs’ and Wattson Plaintiffs’ Senate maps each only create 2 such districts.

Similarly, the Corrie Plaintiffs' House Plan has 24 districts with 30% or greater minority voting-age population. The Sachs Plaintiffs' House Plan also has 24, but the Wattson Plaintiffs' has only 21, and the Anderson Plaintiffs' has only 18. The Corrie House Plan is the only plan that creates a district (HD 2B) where American Indian/Native American residents constitute 44.5% of the district population, giving this community the ability to elect candidates of choice when voting in alliance with others.

Finally, to the extent that the Wattson Plaintiffs purport to protect minority voters through their Redistricting Plans, this is a farce. In reality, the Wattson Plaintiffs chose to deplete minority populations from districts that have previously elected minority candidates. (*See infra* § II(E).)

### **C. American Indian Tribes**

The Corrie Plaintiffs' Redistricting Plan prioritizes preserving Minnesota's American Indian reservations. As discussed in more detail herein (*see infra* § II(F)(5)), the Corrie Congressional Plan unites the major American Indian reservations, including non-contiguous portions, by uniquely creating a northern district. The Corrie House and Senate Plans minimize reservation splits by placing more reservations in nested House districts. In contrast, the Anderson Plaintiffs' Congressional Redistricting Plan splits 11 reservations, the Sachs Plaintiffs' Plan splits 3, the Wattson Plaintiffs' splits 2 (including a major tribe—Red Lake), and the Sachs Plaintiffs' splits 3 between Congressional Districts 7 and 8. For their Legislative Redistricting Plans, the Anderson Plaintiffs also split 11 of the reservations, 30 times for the House and 35 times for the Senate. The Wattson Plaintiffs' Legislative Plan splits 5 reservations 10 times for the Senate; and 6

reservations 13 times for the House. The Sachs Plaintiffs' Legislative Plan splits the reservation lands of 5 American Indian tribes, but they do ameliorate the House splits with nesting into Senate districts.

**D. Convenient, Contiguous Districts**

Each of the parties, including the Corrie Plaintiffs, satisfy the requirement that the congressional and legislative redistricting plans consist of convenient, contiguous districts.

**E. Political Subdivisions**

Although the Corrie Plaintiffs' Proposed Redistricting Plans divide more counties than the other parties' plans, our Redistricting Plans have the lowest number of city splits. In addition, where counties are split, splits are done for good reason (to preserve communities of interest and protect minority voting rights) and in a manner consistent with the applicable legal authority. *See, e.g., Reynolds v. Sims, 377 U.S. 533, 575 (1964)* (reasoning that, although the preservation of political subdivisions *can* be considered, political subdivisions “are not sovereign entities. Rather, they have been traditionally regarded as subordinate governmental instrumentalities created by the State to assist in the carrying out of state governmental functions).

In fact, in light of the dramatic population changes in Minnesota over the last decade, the current county and city lines are not (necessarily) an accurate indication of where communities of interest, including Minnesota's BIPOC communities reside. Put another way, communities can grow (and have grown) across city lines into suburbs sometimes crossing county lines. This is particularly true because—unlike the requirements for the congressional and legislative boundaries—there is no requirement that

the boundaries of Minnesota's local government units be redrawn every ten years, and local government redistricting (drawing the ward and precinct boundaries) will not be complete until after this Panel issues its final order on the redistricting plans. *See* Minn. Const. Art. XII § 3. (*See also* Local Government Redistricting 2002 (Feb. 2020), <https://www.house.leg.state.mn.us/hrd/issinfo/LocalRedist2020.pdf> (noting that, in general, local governments are required to wait until redistricting maps for both congressional and legislative districts are complete before they can begin redrawing local wards and precincts). If political subdivisions are prioritized above the preserving communities of interest, communities will certainly be divided and, as a result, minority voting rights will also be impacted.

As such, the Corrie Plaintiffs prioritized the compelling interest of giving cohesive minority populations the opportunity to elect candidates of choice and preserving communities of interest, including BIPOC communities of interest. While the Corrie Plaintiffs' Redistricting Plans do split counties and cities, the divisions are as narrowly tailored as possible. And the Corrie Plaintiffs' narrow tailoring results in the least city splits compared to the congressional, senate, and house plans of the other plaintiffs.

Notably, the Wattson Plaintiffs also divide a large number of political subdivisions: 12 counties (18 times) and 10 cities at the Congressional level; 45 counties (97 times), 38 cities (47 times) at the State Senate level; and 54 counties (174 times), 73 cities (104 times) at the State House level. Unlike the Corrie Plaintiffs, however, they do so in pursuit of least change policy, protection of incumbents, and with little regard to minority voting rights or communities of interest. The Wattson Plaintiffs argue that their political

subdivision splits were necessitated largely by “[t]he substantial shift in population from the rural areas of [Minnesota] into the Twin Cities suburbs and exurbs ....” (Wattson Redistricting Memo at 29.) In other words, they argue that more splits were needed in the Twin Cities metro area, to push growing population in the city outward. But throughout their discussion, the Wattson Plaintiffs make scant mention of Minnesota’s BIPOC communities. Rather, they pursue incumbent protection in the guise of protecting minority voting rights, perhaps hoping this Panel will not see they have directly contravened this Panel’s Redistricting Principles. (*See* Wattson Redistricting Memo at 67-70.) As a result, the Wattson Plaintiffs’ Redistricting Plan divides political subdivisions for non-compelling, and specifically verboten reasons—preserving specific incumbent’s power.

Moreover, the Wattson Plaintiffs choose to deplete the populations that have elected minority candidates. For instance, in Brooklyn Park and Brooklyn Center, the Wattson Plaintiffs describe dropping the minority population of HD 39B (which previously elected a candidate of color) from 59% minority (24% Black, 18% Asian) to 38% minority (15% Black, 9% Asian) and distributing those populations to two White incumbents. (Wattson Redistricting Memo at 63-64; *see also* Wattson Redistricting Memo at 67-68 (discussing the depletion of the minority population from 60B from 39% to 32%).) If adopted, the Wattson Plaintiffs’ Redistricting Plans will have a lasting negative impact on the political power of BIPOC and other historically disenfranchised communities.

Political Subdivision Splits

| Party    | Congress |           | Senate   |            | House    |            |
|----------|----------|-----------|----------|------------|----------|------------|
|          | Counties | Cities    | Counties | Cities     | Counties | Cities     |
| Wattson  | 62       | 62        | 142      | 143        | 228      | 251        |
| Anderson | 25       | 38        | 124      | 156        | 191      | 218        |
| Sachs    | 25       | 38        | 118      | 152        | 209      | 244        |
| Corrie   | 37       | <b>25</b> | 154      | <b>121</b> | 236      | <b>210</b> |

**F. Communities of Interest**

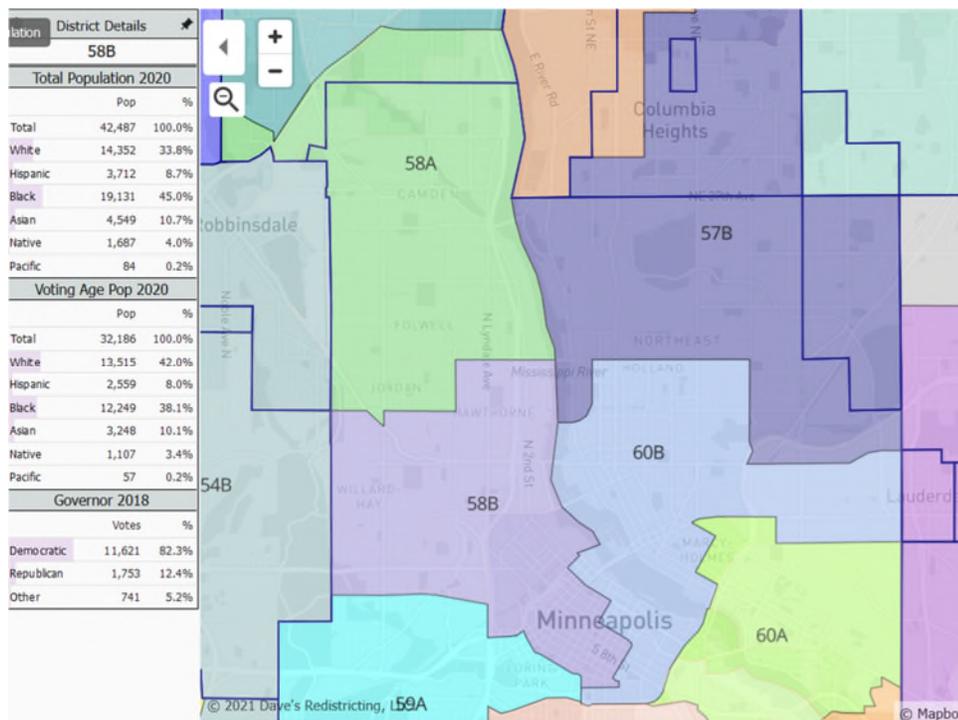
The Corrie Plaintiffs are the only party who engaged in a robust grassroots campaign with the goal of creating a redistricting plan that incorporates direct input from communities of interest, including BIPOC communities of interest, across the state. As a result of the extensive organizing efforts undertaken by the Corrie Plaintiffs and their coalition partners (*see* Corrie Plaintiffs’ Memorandum in Support of Legislative Plan § II (describing the grassroots efforts that led to the creation of the Corrie Plaintiffs’ Redistricting Plan)), the Corrie Plaintiffs Redistricting Plans most effectively balance the interests of Minnesota’s diverse and rapidly changing communities by preserving communities of interest (as described below) and maintaining BIPOC communities’ influence over congressional and legislative elections thereby ensuring that Minnesota’s BIPOC communities have a say in Minnesota’s elections.

In the subsections below, the Corrie Plaintiffs’ section, describe how their Congressional and Legislative Redistricting Plans preserves communities of interest compared to the other parties’ plans.

# 1. The Twin Cities

## North Minneapolis

### Corrie Plan: House Districts 58A, 58B, 60A, 60B



The Corrie Plaintiffs’ Legislative Plan includes two districts in the northwest quadrant of Minneapolis (a/ka/ the “North Side”), in which Black/African American residents constitute a plurality. More specifically, District 58A is 39% Black/African American (34% voting age population), and District 58B is 45% Black/African American (38% voting age population).

Further, over the past decade, downtown Minneapolis grew faster than any other part of the city. And, unlike statewide population trends, the downtown growth was driven by an influx of White residents. To maintain a Black/African American plurality in north

Minneapolis districts, the Corrie Plaintiffs moved some majority-White downtown precincts from House District 58B to House District 60B, which contains most of the neighborhoods in the middle of northeast Minneapolis that share a similar demographic profile. The Corrie Plaintiffs then shifted their proposed House District 58B northward, which caused House District 58A to grab a small piece of Brooklyn Center. Notably, Brooklyn Center stakeholders indicated that city's southernmost residents were as connected with north Minneapolis as they were with the rest of Brooklyn Center. However, outside the southern part of Brooklyn Center, stakeholders sought to be connected with Brooklyn Park as much as possible. Thus, aside from a very small section of Brooklyn Center that is connected to north Minneapolis, the Corrie Plaintiffs' Congressional and Legislative Redistricting Plans connect Brooklyn Center and Brooklyn Park to each another, rather than to Minneapolis proper.

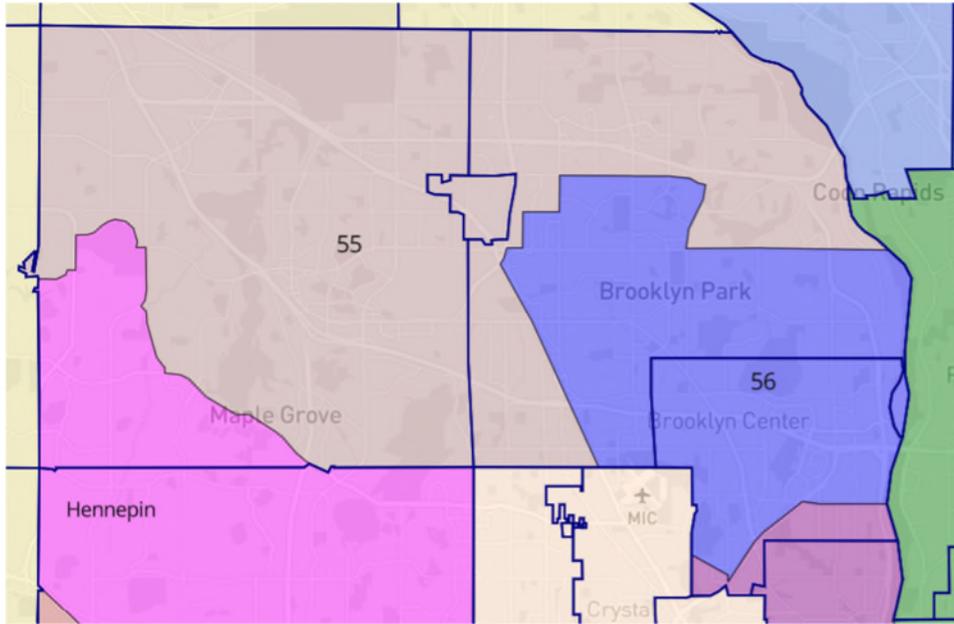
In contrast to the Corrie Plaintiffs' Redistricting Plans, the other parties' proposals maintain the current shape of districts in areas the Corrie Plaintiffs' have numbered 58A and 58B. As a result, District 58B has a lower percentage of Black/African American residents than the Corrie Plaintiffs' Legislative Plan. Put another way, the Corrie Plaintiffs' House District 58B is the only one that does not retrogress the population in the Black/African American community.<sup>1</sup>

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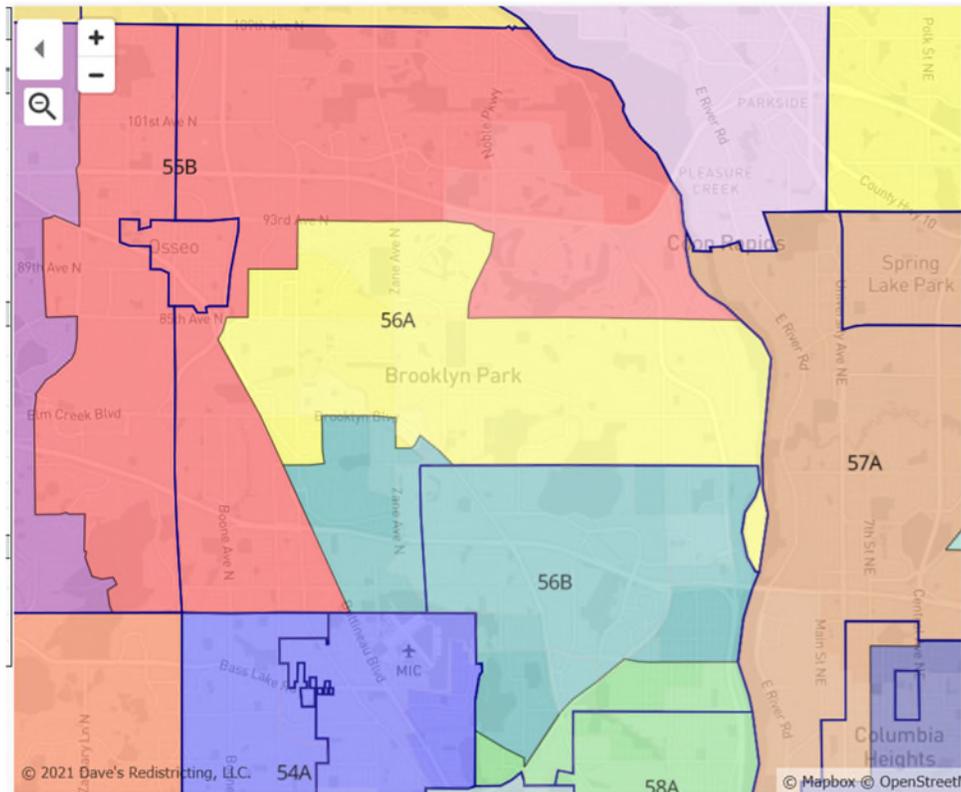
<sup>1</sup> An alternative configuration in this area might incorporate the Elliot Park precinct (located at the far southeast section of downtown Minneapolis, which is currently labelled W-6 P-4) into District 60A; the Corrie Plaintiffs would support this alternative because it would increase the Black/African American population of District 60A.

# Brooklyn Park and Brooklyn Center

## Corrie Plan: Senate Districts 56 and 55



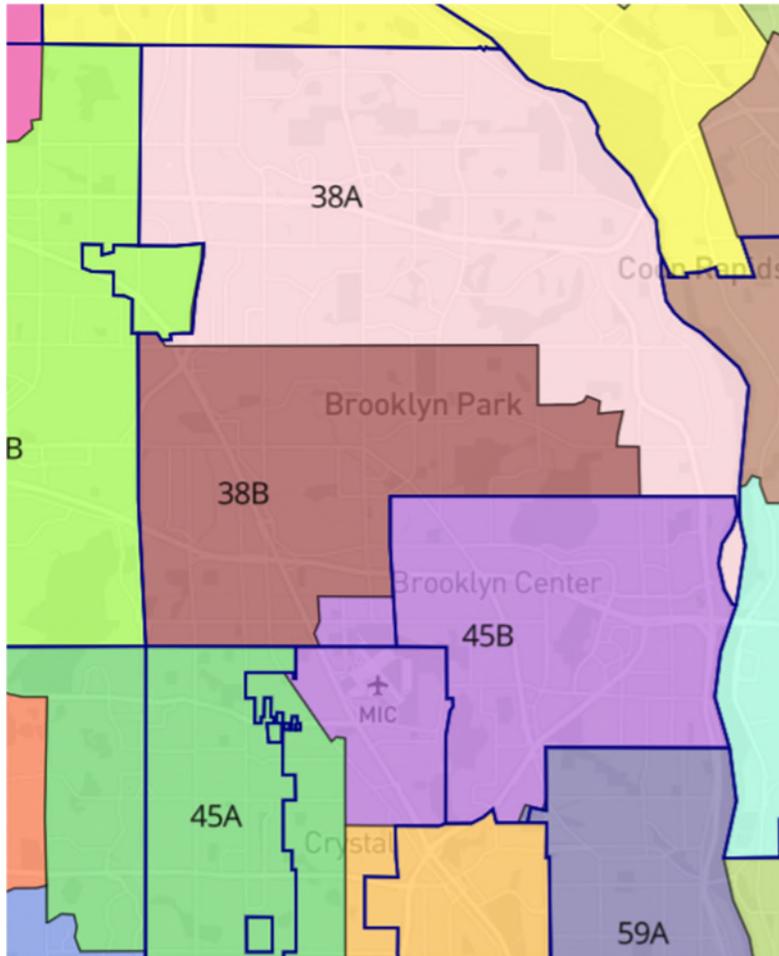
## Corrie Plan: House Districts 56A and 56B



North of Minneapolis, stakeholders in the cities of Brooklyn Center and Brooklyn Park expressed a desire for their cities to remain together in a specific configuration. In Brooklyn Park, stakeholders from Asian American, African-American, and West African communities wanted a north-south split within the city. The Corrie Plaintiffs Legislative Redistricting Plan does just that: (1) House District 56B in Brooklyn Center grabs a piece of Brooklyn Park immediately to the west of it, connecting African American and West African populations (39% Black/African-American/35% VAP); and (2) District 56A uses an east-west configuration to connect these same 3 communities (34% Black/African-American/30% VAP; 25% Asian-PI/23% VAP) along the commercial corridors of 73rd and 85<sup>th</sup> Avenues North, which feature several businesses that cater to these communities. Finally, House District 55B, which is comprised of the north and far west parts of Brooklyn Park and features less diversity compared to the rest of the city, is in a separate Senate district.

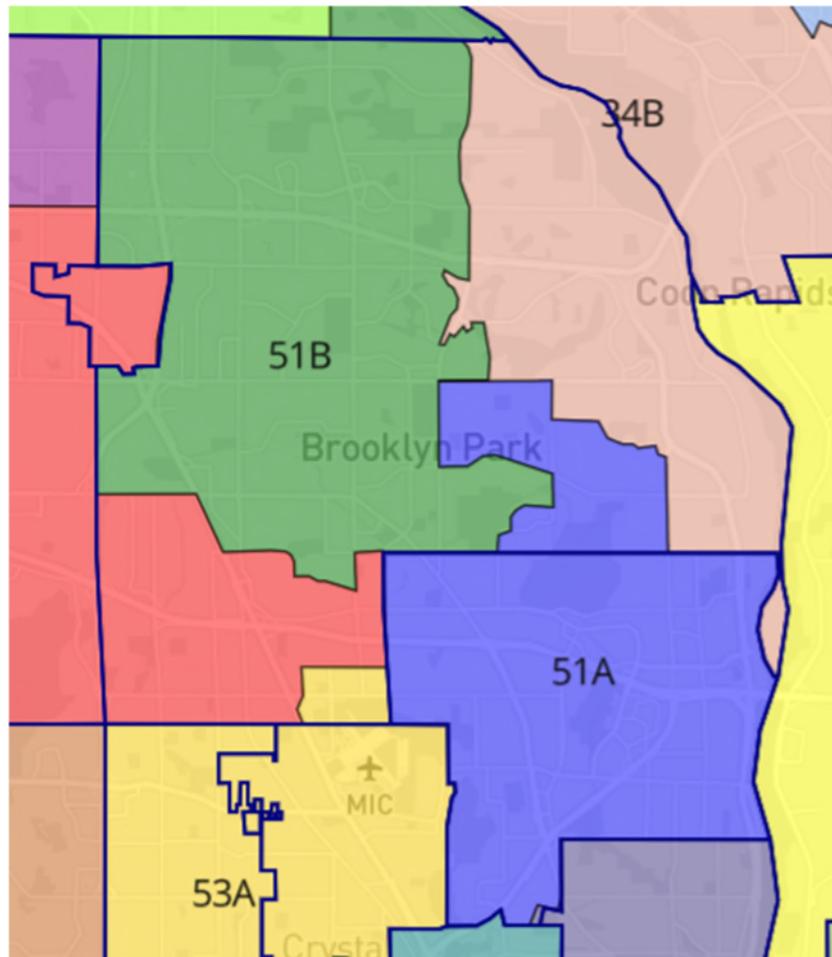
While the Anderson Plaintiffs' plan comes close to the Corrie Plaintiffs' proposed configuration in Brooklyn Park and Brooklyn Center, instead of joining Brooklyn Center and Brooklyn Park in the same Senate district, as the BIPOC stakeholders in these communities requested, the Anderson Plaintiffs put Brooklyn Center in the same Senate district as Crystal and New Hope, as depicted below:

Anderson Plan: House Districts 38A, 38B, and 45B



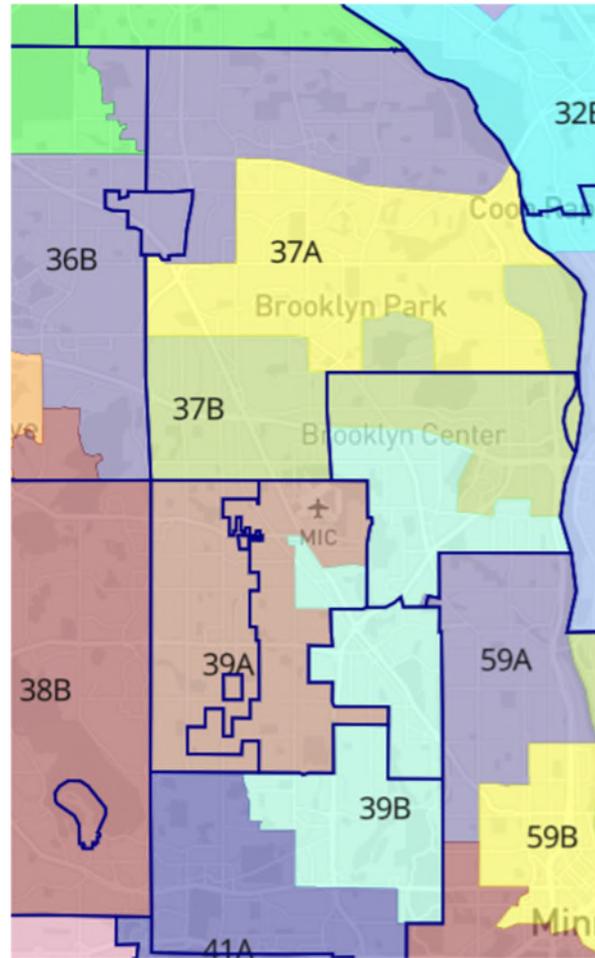
In addition, as depicted below, the Sachs Plaintiffs’ Legislative Redistricting Plan splits Brooklyn Park east and west rather than north and south. And, although the Sachs’ Plan does connect a small piece of Brooklyn Park and Brooklyn Center proper in House District 51A, it is not as effective as the Corrie Plaintiffs’ Plan in uniting the Asian American, African-American, and West African communities.

Sachs Plan: House Districts 51A, 51B, and 34B



Finally, as depicted below, the Wattson plan in this part of the metro area makes little sense in that it connects southern Brooklyn Center with all of Robbinsdale, part of Crystal, and a large part of Golden Valley. A much neater and more effective configuration is available, as reflected in the Corrie Plaintiffs' map.

Wattson Plan: House Districts 37A, 37B, & 39A

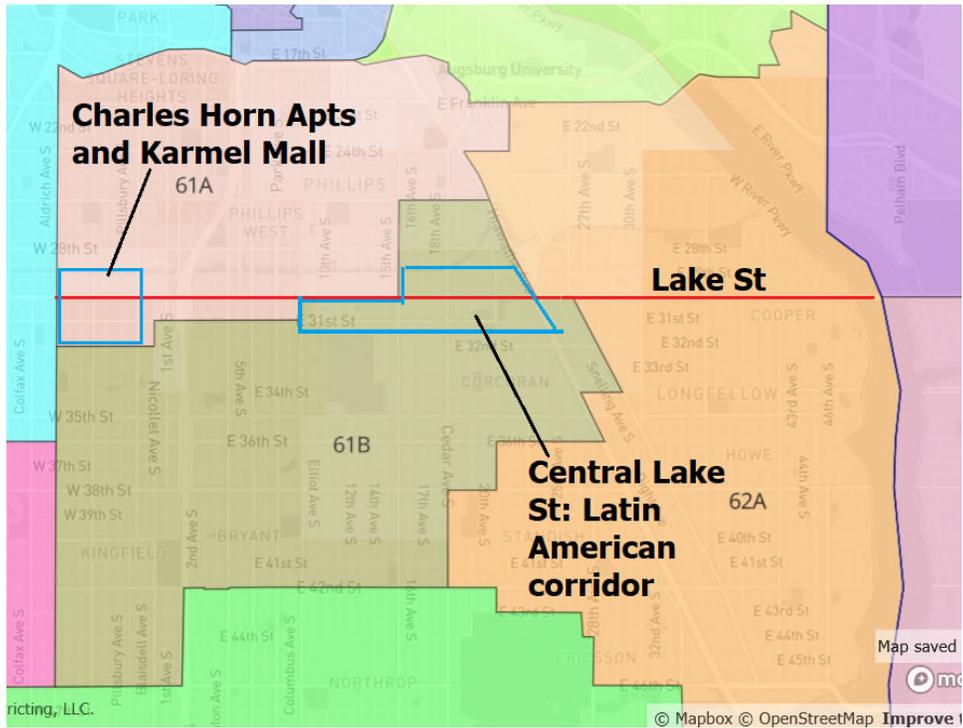


**South Minneapolis**

Corrie Plan: House Districts 61A and 61B

In South Minneapolis, the biggest change The Corrie Plaintiffs made to the current configuration of House Districts 62A and 62B (61A and 62B in the Corrie Plaintiffs’ Legislative Redistricting Plan) is how we split these districts from each other. Instead of dividing them in a straight line along Lake Street, the Corrie Plaintiffs’ configuration adds the precinct along west Lake Street that contains the Charles Horn apartments (a primarily East African apartment complex) and the Karmel mall. The Corrie Plaintiffs’ proposed

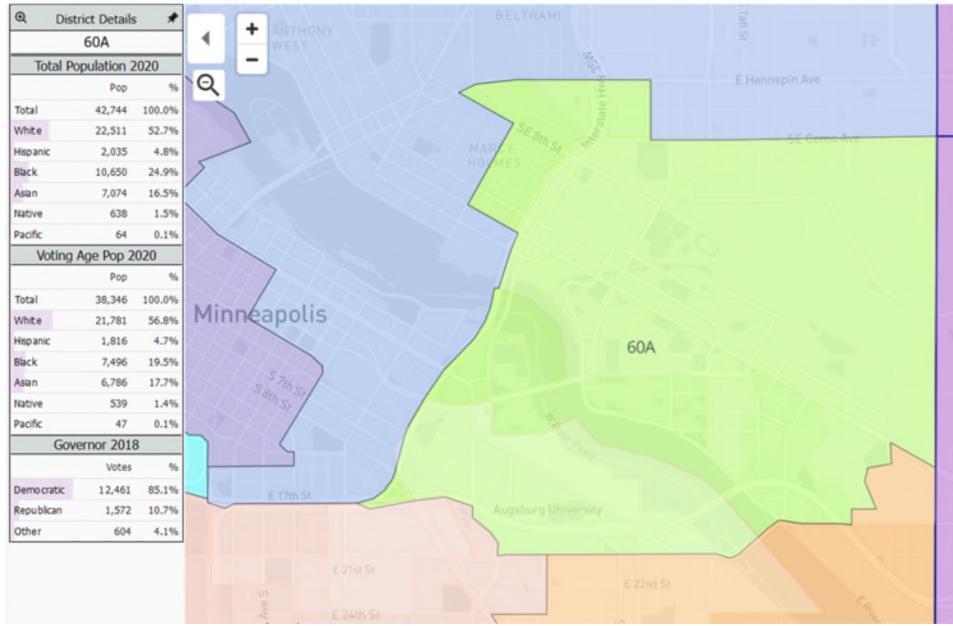
House District 61A is 38% Black/African American/34% VAP. In addition, the Corrie Plaintiffs placed blocks and commercial areas along the south side of central Lake Street in District 61B, which features a Latin American population that is the largest BIPOC group in the district (25% total population/21% VAP). Currently, these districts have elected a member of the East African Community and the Latin American community, respectively. Our configuration makes a few adjustments intended to maintain this situation.



Corrie Plan: House District 60A

The Corrie Plaintiffs’ proposed House District 60A lies just northeast of Senate District 61 and maintains the East African communities that live in and around the Cedar-Riverside and Seward neighborhoods. The East African and African American community maintains its status as the largest BIPOC community in this district (25% total

population/20% VAP). Currently, this district is represented by a member of the East African Community. The Corrie Plaintiffs’ proposed configuration respects these dynamics.



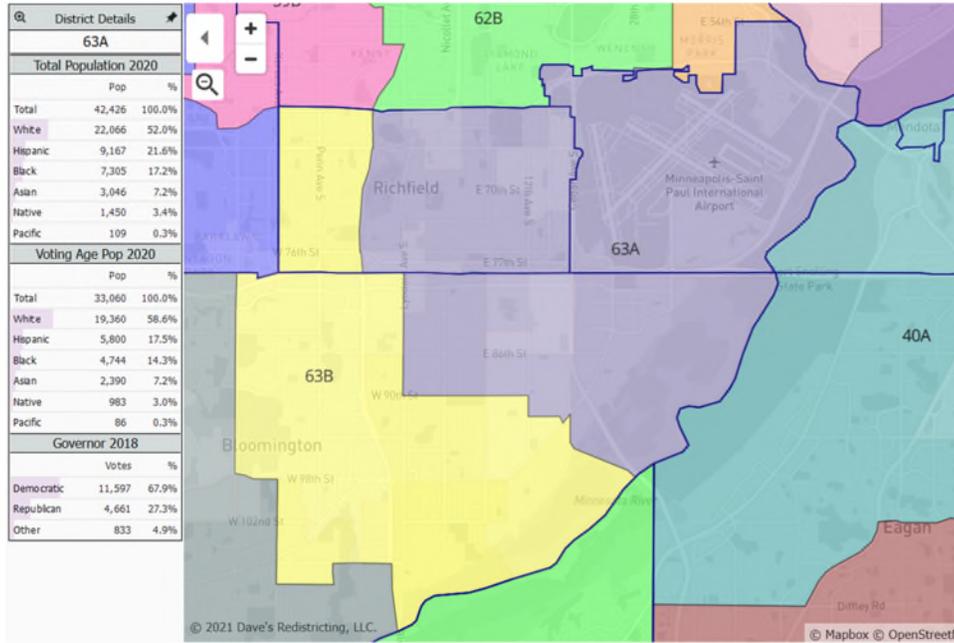
In contrast, the Wattson Plaintiffs Legislative Redistricting Plan combines Cedar Riverside with the districts we refer to as House District 62A and 62B. Although Black/African Americans are the largest BIPOC group in the Wattson Plan, the Wattson Plan eliminates a seat in South Minneapolis in which Latinos constitute a plurality, diminishing their influence in this area and making it less likely that a candidate of color might be elected. The Wattson Plan also ignores the BIPOC economic corridors along Lake Street that are described above, places the East African community on the far west side in a primarily White district to the South, and places the Latino community on the far east side of Lake Street in a district where the African American population is the plurality.

Likewise, the Sachs map also misses the mark. The Black/African American population in their Cedar-Riverside district falls below 20%, and their version of our district 61B combines the East African corridor with the Latin American corridor instead of featuring each community in its own district.

### **Richfield and Bloomington**

The Corrie Plaintiffs' proposed House District 63A is located just south of Minneapolis. This configuration aims to combine Latino communities in east Richfield and northeast Bloomington, who expressed interest in being joined together in a district. In light of their shared interest, our proposed District 63A is 22% Latino, 18% VAP. This district also contains the Minneapolis-Saint Paul Airport and the Mall of America, two major economic hubs that employ a large number of Latinos in the region. In addition, House District 63B captures much of the economic corridors not in House District 63A that are also supported by this community.

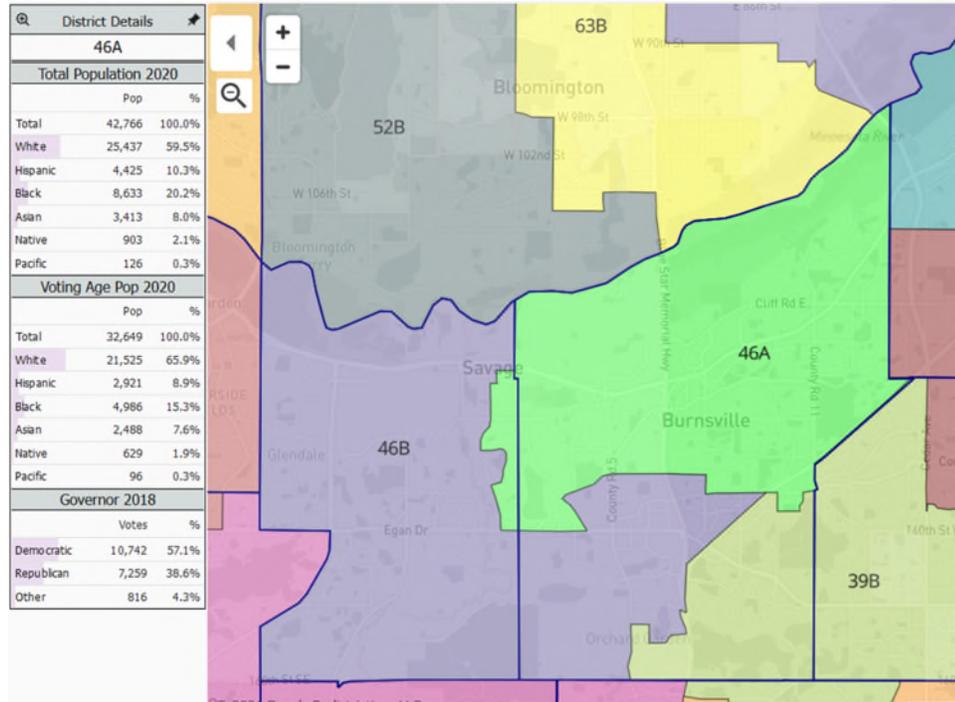
## Corrie Plan: House Districts 63A and 63B



Notably, none of the other parties proposes a district like this one, although the Sachs Legislative Redistricting Plan does join a small slice of east Bloomington with Richfield and the airport for a seat that is 18% Latin American, 15% VAP.

## Burnsville and Savage

### Corrie Plan: House District 46A



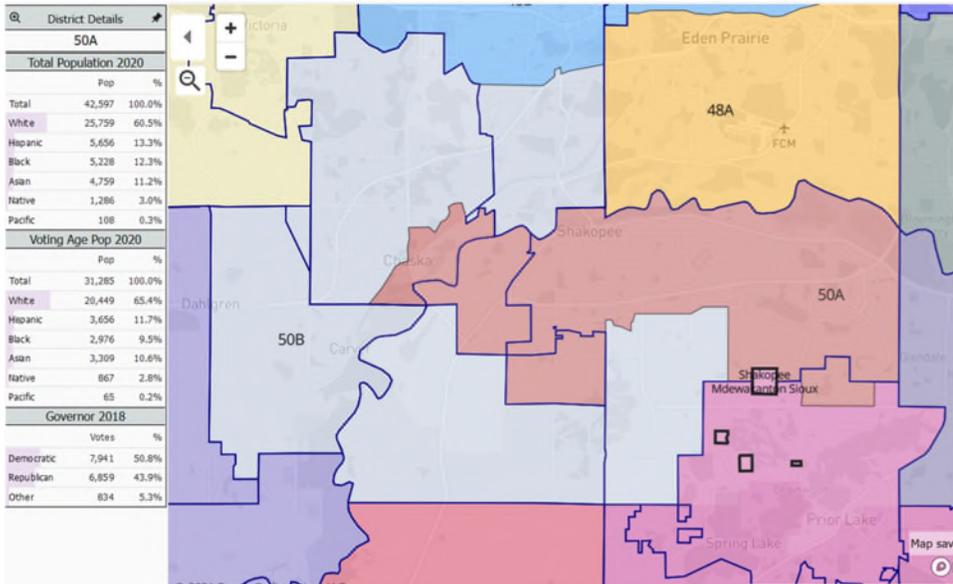
As shown on the map above, Southwest of Senate District 63, the cities of Burnsville and Savage feature a prominent corridor for the East African community. In our proposed District 46A, which is 20% Black/African-American, 15% VAP, BIPOC communities total 40% of the population. No other proposal offers a comparable district of color in this area.

### Chaska, Jackson Township, and Shakopee

House District 50A, which is located west of the Corrie Plaintiffs' District 46, unites the Latino, East African, and Asian American communities of Chaska, Jackson Township, and Shakopee. We maintain these communities' economic corridors in the remainder of Chaska, within the same Senate District (50). BIPOC communities are nearly 40% of the

population of 50A. No other proposal as effectively unites the Latino, East African, and Asian American communities in this area.

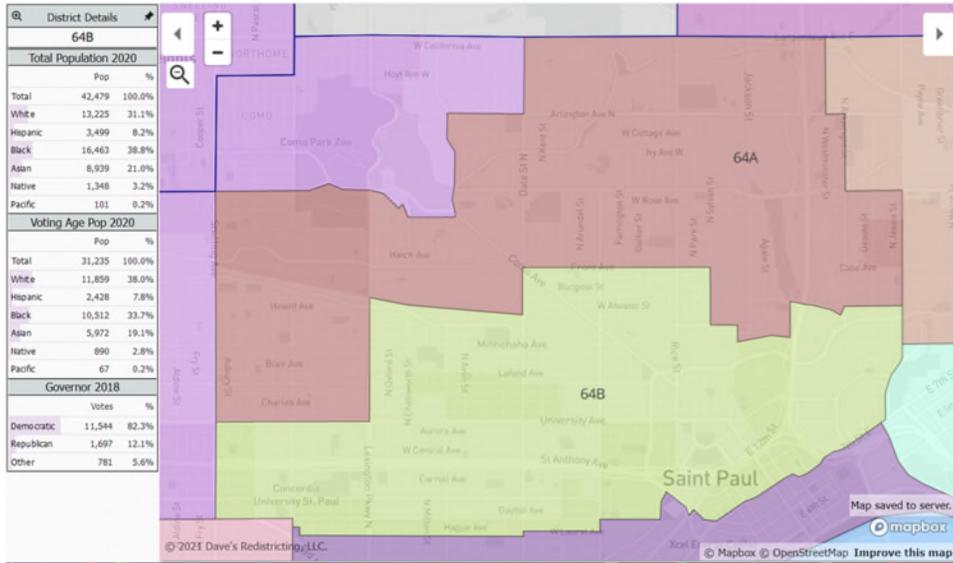
Corrie Plan: House Districts 50A and 50B



**St. Paul**

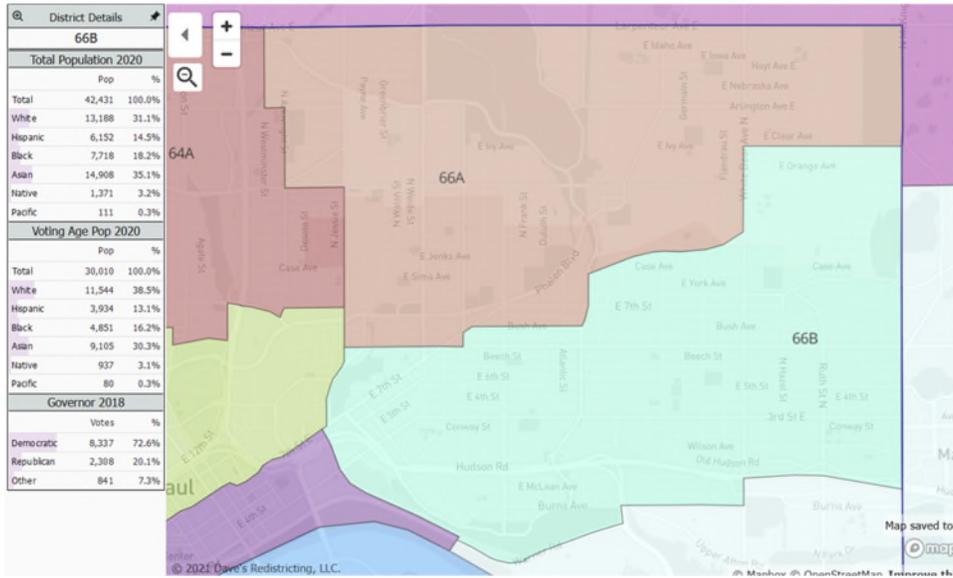
In Saint Paul, the Corrie Plaintiffs sought to build on the work performed by communities before this redistricting cycle by connecting specific communities to their economic and residential corridors. District 64B (39% Black/African American and 34% Black/African VAP) includes the traditional Black/African American neighborhoods of Rondo and Frogtown, along with the Capitol complex, all of which employ a large number of members of this community. Further, the Corrie Plaintiffs’ configuration of district 64A, which is 29% Asian-Pacific Islander (24% VAP) and 24% Black/African American (20% VAP) provides a district in which a coalition of African Americans and Asian Americans constitute a majority of the population.

## Corrie Plan: House Districts 64A and 64B



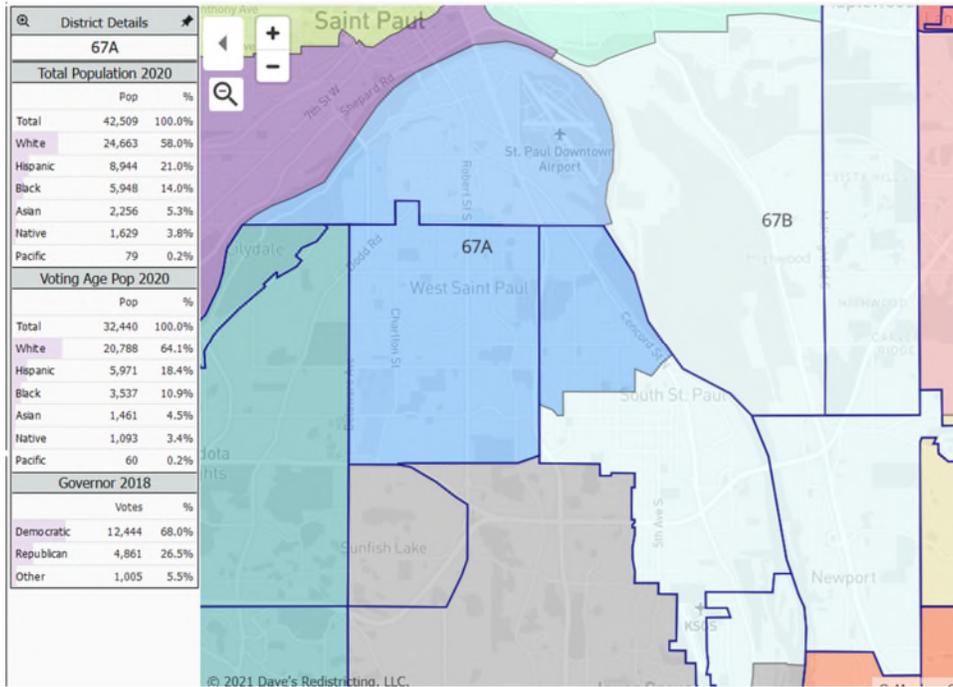
While all of the other parties' Plans create a district in central St. Paul with an African American plurality, the Corrie Plaintiffs' Plan establishes the largest plurality and does not leave primarily African American neighborhoods in other districts where they would be separated from the rest of the community. Specifically, for example, along the University Avenue corridor, our plan offers the longest connection. This configuration also was requested by the deaf-blind community, who wanted most of the south side of University Avenue, and the blocks immediately south of it, in one district. This is due to the density of businesses and community centers on this side of that road that offer services for this community. Our map places over 70% of this part of University Avenue in the same seat, while other proposals that split this part of University Avenue into three different seats.

Corrie Plan: HD 66A and 66B



Consultations with Hmong American and Karen American stakeholders in the east side of St. Paul directed us to draw House District 66A (40% Asian-Pacific Islander/36% VAP) and 66B (35% Asian-Pacific Islander/30% VAP), both of which have an Asian-American plurality. While all of the other proposals offer a district that is similar to our 66A and 66B, ours increases this community’s current share of the population in House District 66B.

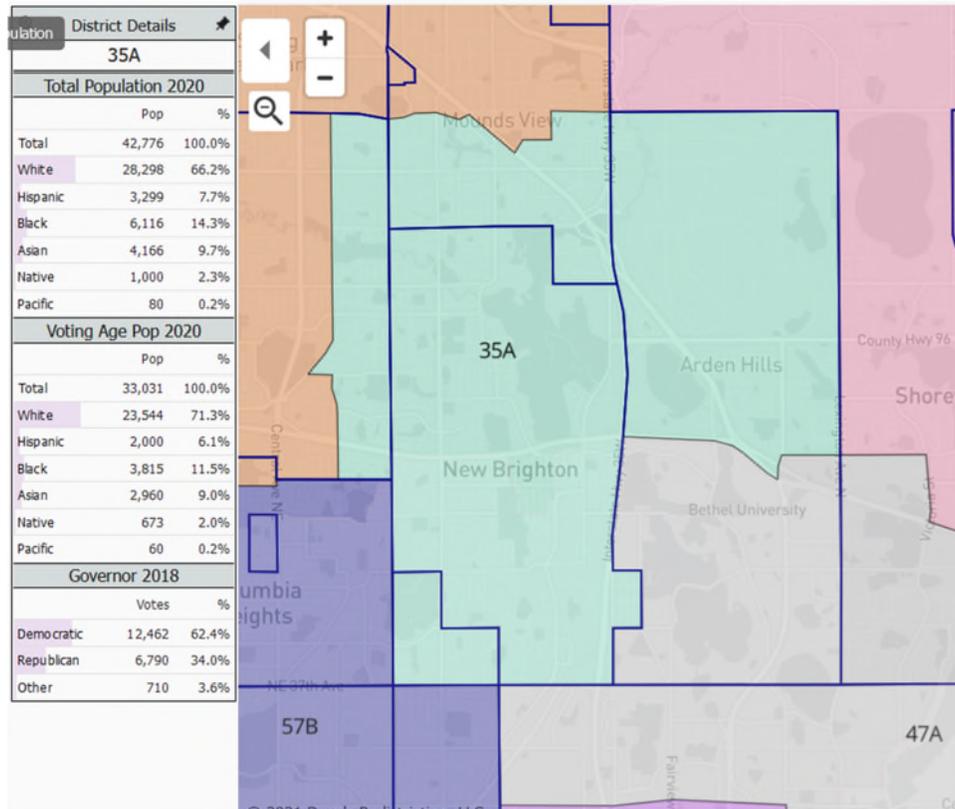
## Corrie Plan: HD 67A



Members of the Latino community that reside in what is known as the “West Side” of Saint Paul (the part of St. Paul across the Mississippi River from the downtown) asked to be connected with the City of West Saint Paul, rather than the downtown area of St. Paul proper. This permits the drawing of a district in which the Robert Street corridor is combined into a single house seat and is connected with the Cesar Chavez Street commercial corridor. In addition, this results in unifying the Latino/Hispanic community (constituting 21% of the district’s population and 18% of the voting age population) in House District 67A. None of the other parties’ Plans offer the configuration used by the Corrie Plaintiffs.

## New Brighton, Fridley, St. Anthony, Moundsview

### Corrie Plan: House District 35A

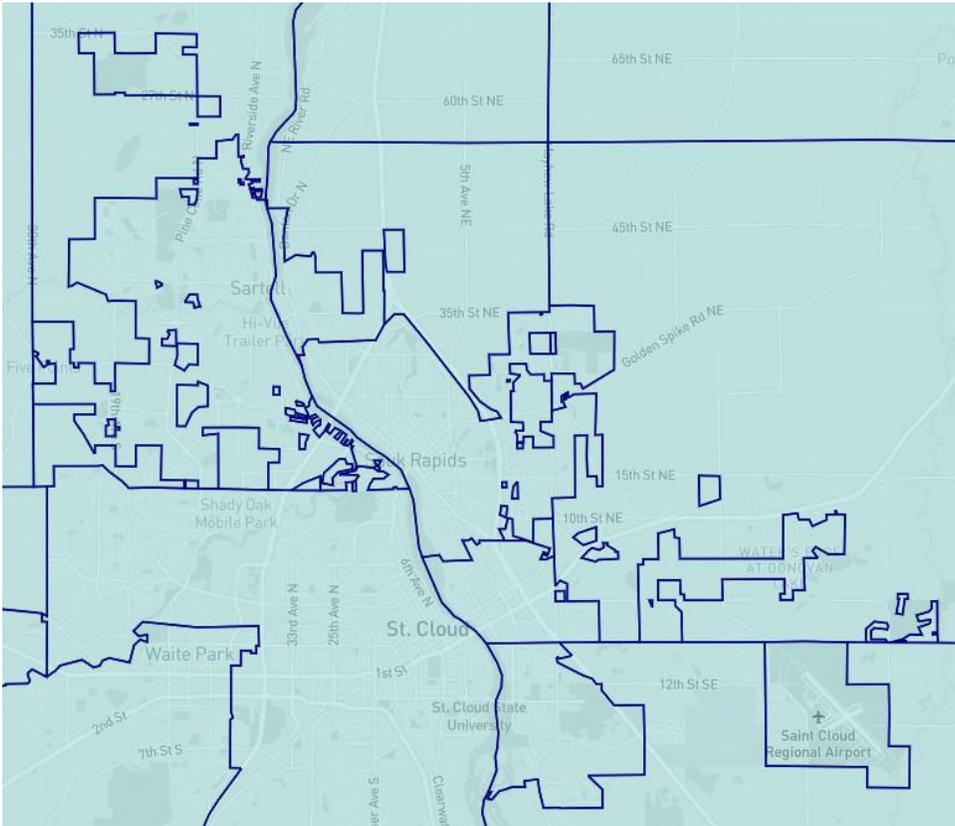


The Tibetan community that resides in the precincts near the border of New Brighton and Fridley wanted as much of that territory as possible to be in the same district. As such, the Corrie Plaintiffs' Legislative Plan places the far east side of Fridley with New Brighton, St. Anthony, and the southern part of Mounds View, keeping this community together. The only other map to offer a similar configuration is the Sachs Legislative Redistricting Plan, although it is not as effective in uniting the Tibetan community as our District 35A. In addition, our configuration is the only one that unites the 3<sup>rd</sup>-ring suburbs and exurbs of northern and western Hennepin County into the same state Senate seat.

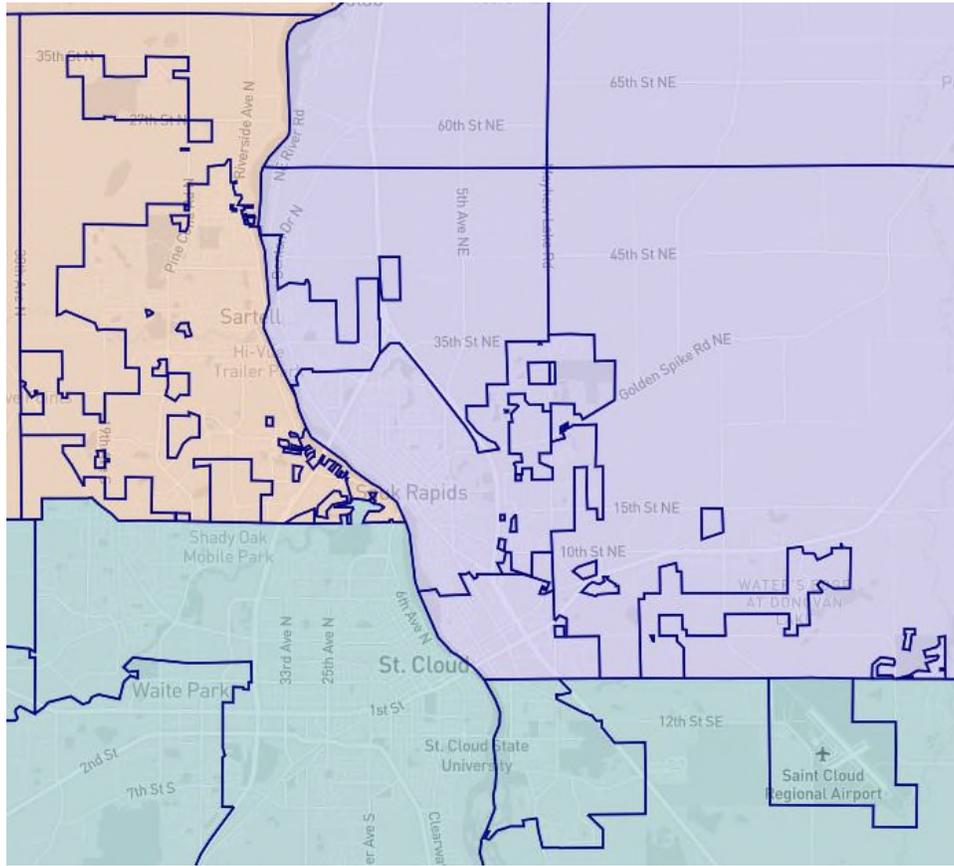
## **2. Central Minnesota/St. Cloud**

St. Cloud is one of the most racially diverse cities outside of the Twin Cities metro area. After extensive discussions with St. Cloud residents, the Corrie Plaintiffs determined the consensus view was to keep the populated areas of the city in one congressional district and one Minnesota Senate district. At the congressional level, stakeholders in the area asked the Corrie Plaintiffs to keep the St. Cloud/Sartell/Sauk Rapids micropolitan united into a single district. As such, the Corrie Plaintiffs Congressional District 6 unites all of this area, with only a neighboring township falling into the bordering Congressional District 7. The Sachs and Wattson plaintiffs also succeed in uniting this micropolitan. The Anderson Plaintiffs Plan, however, not only divides these cities from each other in their Legislative Plan, but even places congressional boundaries within the cities. For example, the Anderson map splits Sartell between its 7th and 8th Congressional Districts, places Sauk Rapids into the 8<sup>th</sup> Congressional District, and splits Saint Cloud between the 6th and 8th Congressional Districts.

Corrie Congressional Map – St. Cloud

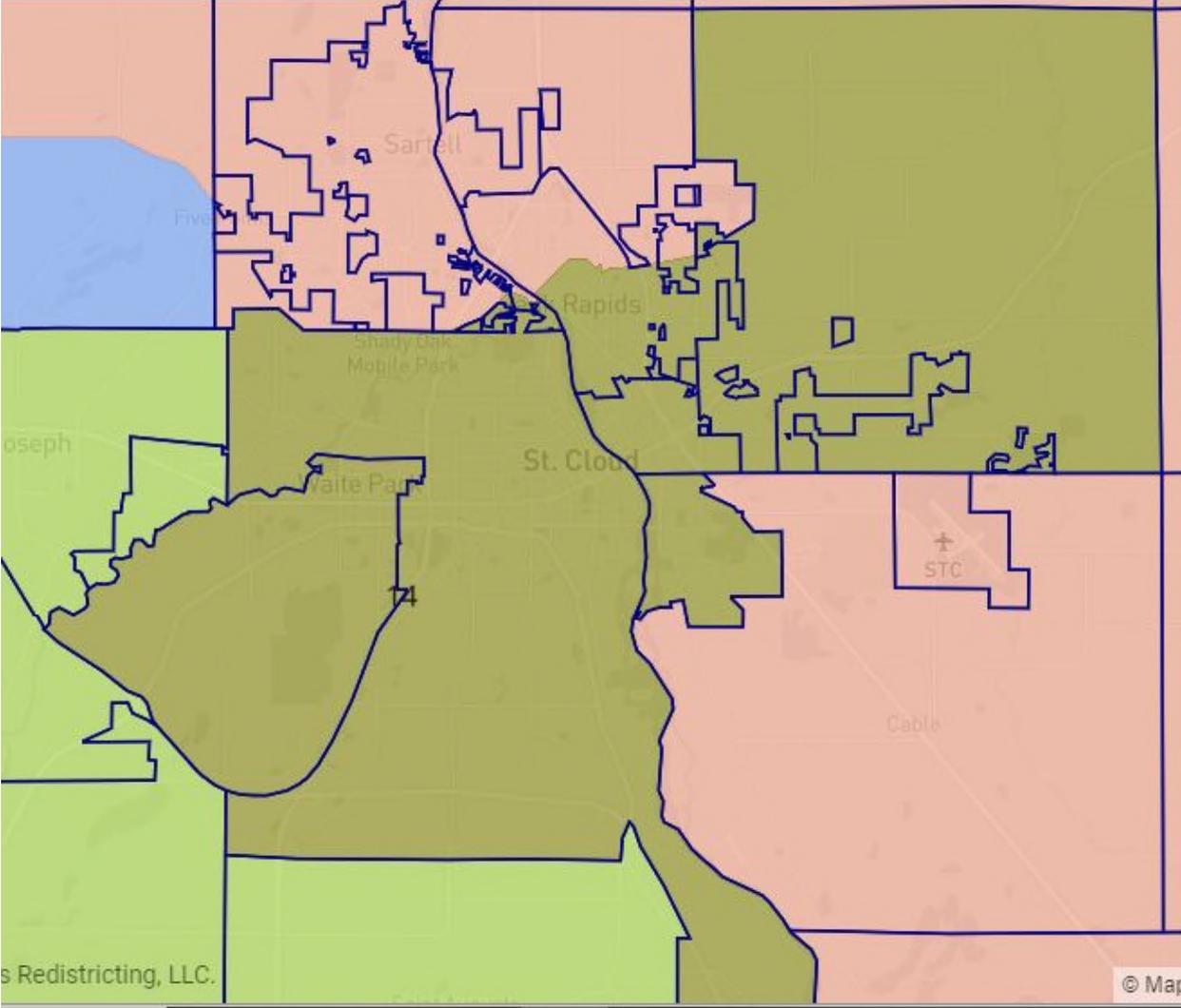


Anderson Congressional Map – St. Cloud

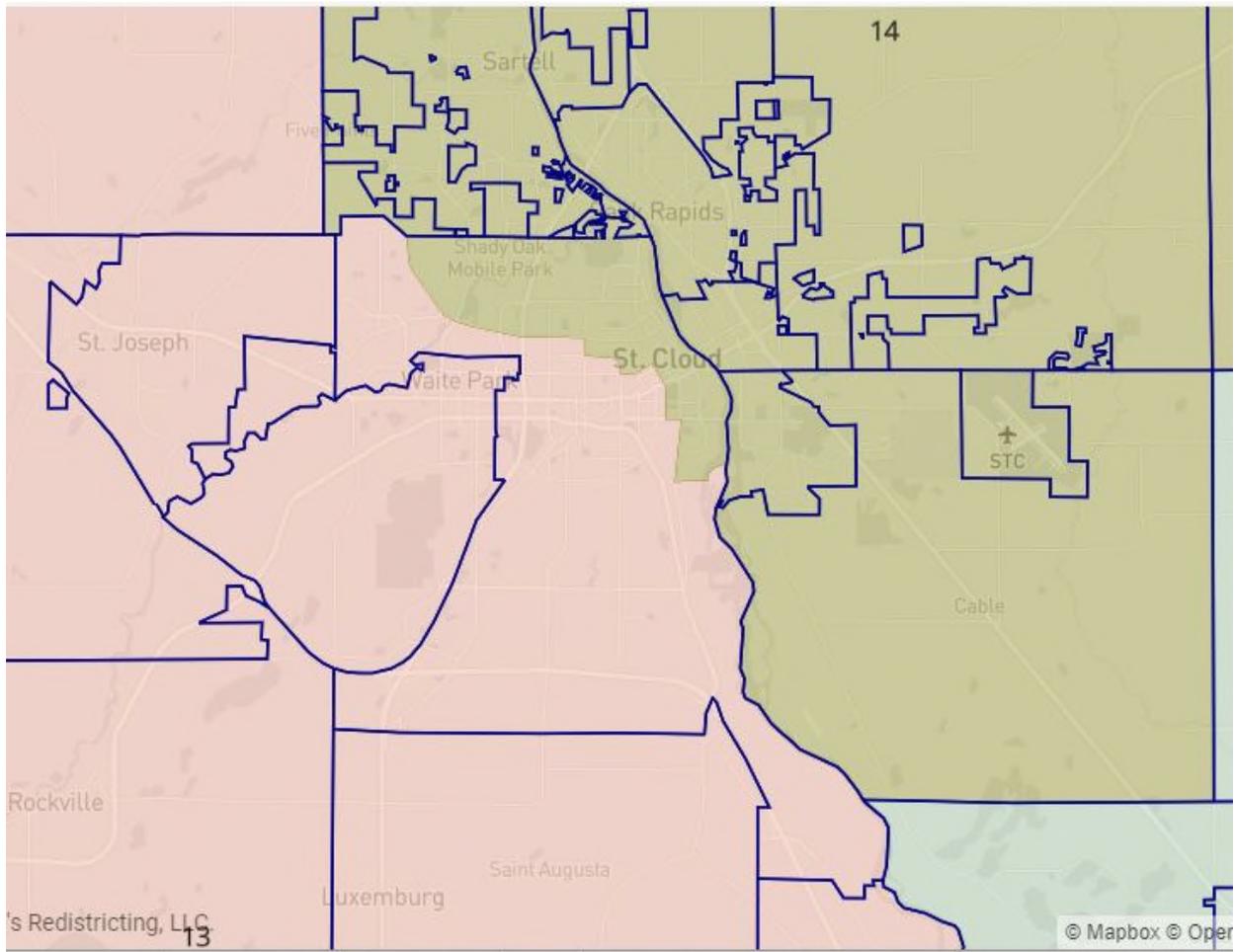


In addition, all parties except for the Anderson Plaintiffs succeeded in placing the populated area of St. Cloud in one Minnesota Senate district. The only part of St. Cloud that is not within the Corrie Plaintiffs’ Senate District 14 is an unpopulated census block that contains an airport. The Anderson Plaintiffs’ Legislative Redistricting Plan divides St. Cloud between its proposed Senate Districts 13 and 14.

Corrie State Senate Map – St. Cloud



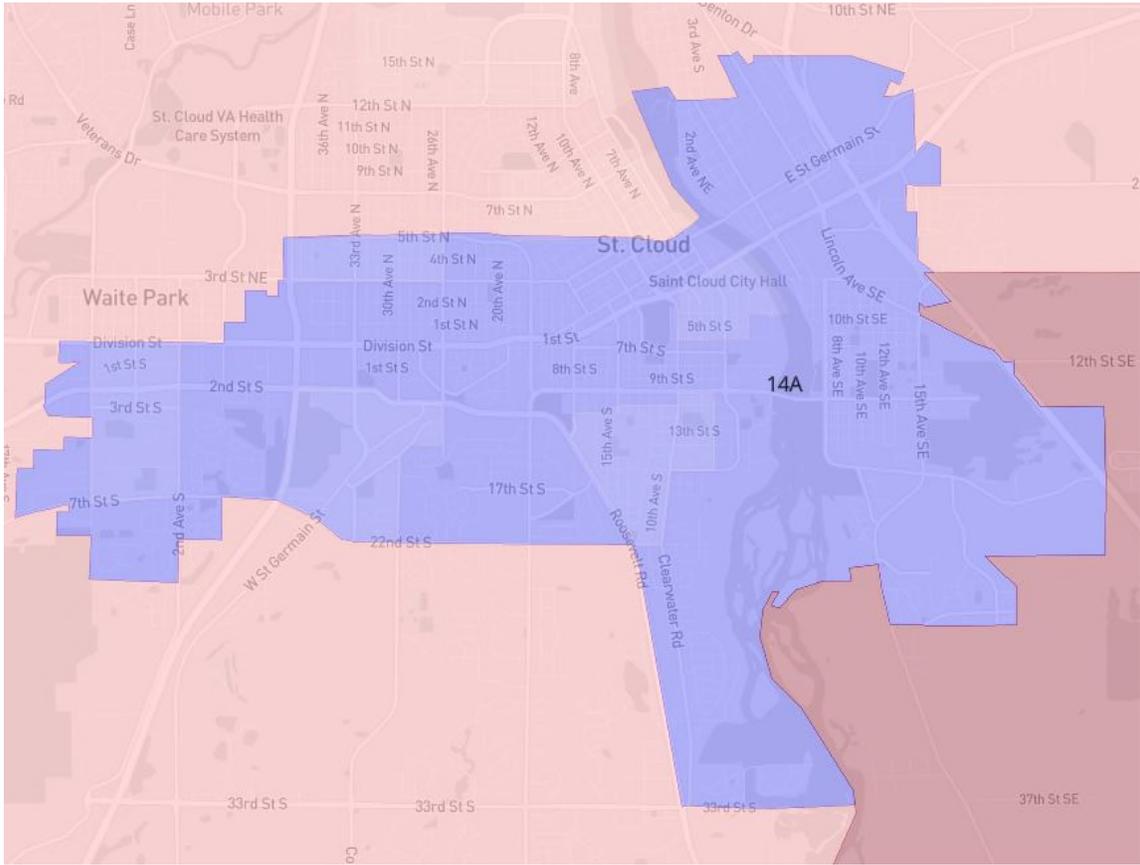
Anderson State Senate Map – St. Cloud



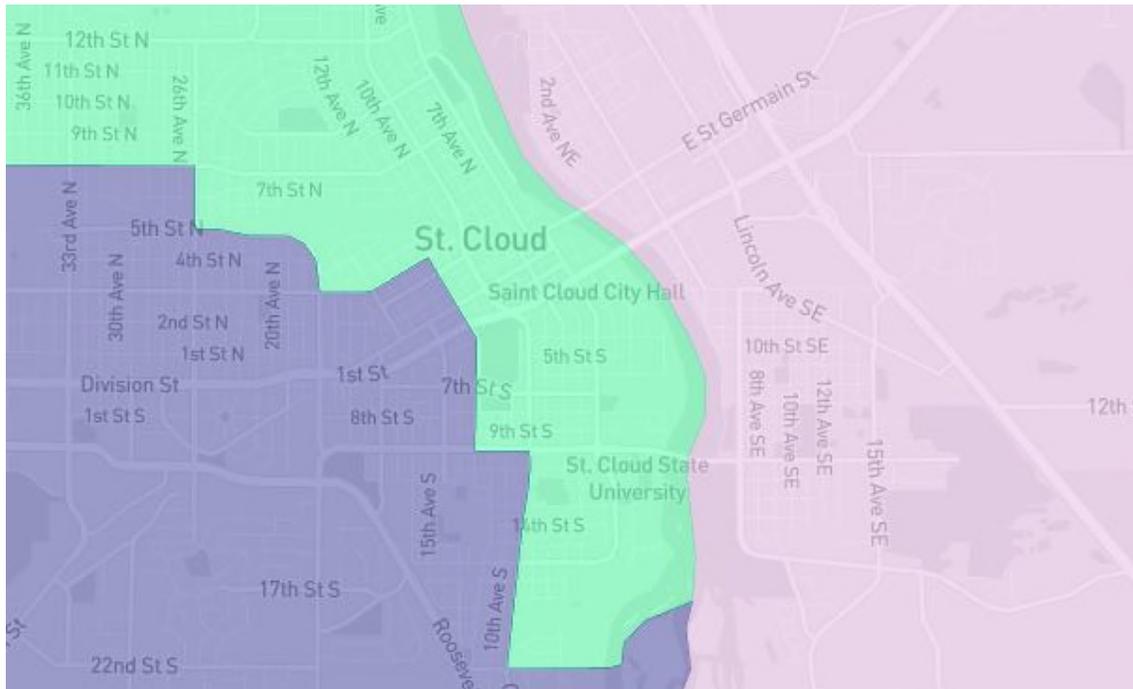
At the House level, the Corrie Plaintiffs’ Legislative Redistricting Plan most effectively empowers St. Cloud’s East African community to elect candidates of their choice. The Corrie Plaintiffs’ House District 14A, keeps the city’s downtown core together and creates a district that is 30.6% Black/African American. By contrast, the Anderson plan cracks the urban core into three House districts—13B, 14A, and 14B—which consist of Black/African American populations totaling only 18.8%, 14%, and 10.9%, respectively. The Wattson plan divides St. Cloud by pairing a smaller section of the downtown core with eastern exurbs while placing the western part of that core in a different

House seat with Waite Park. As a result, it creates two districts, 14A and 14B, in which the Black/African American population is merely 19.4% and 21.2%, respectively. Although the Sachs plan keeps all of the downtown core of St. Cloud within its district 14B, it does not keep the city's East African community in a shared house district like the Corrie map does. By splitting Waite Park and the western part of St. Cloud, the Sachs plan creates two House districts, 14A and 14B, that are only 17.4% and 24.1% Black/African American, respectively. By dividing St. Cloud's downtown core, none of the other plaintiffs draw House district maps that empower the city's Black residents as much as the Corrie map's 30.6% Black house district does.

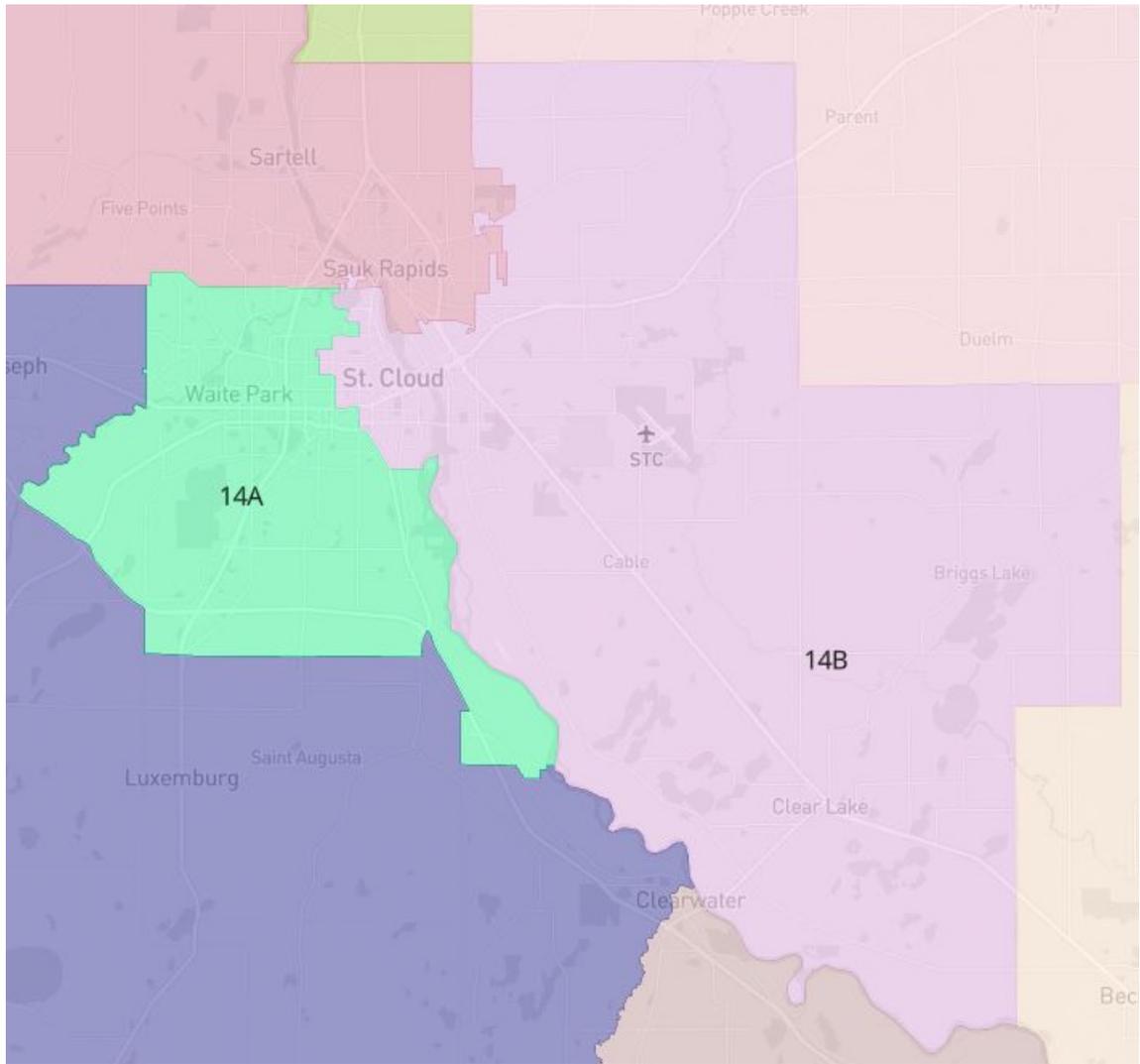
Corrie House Map – St. Cloud



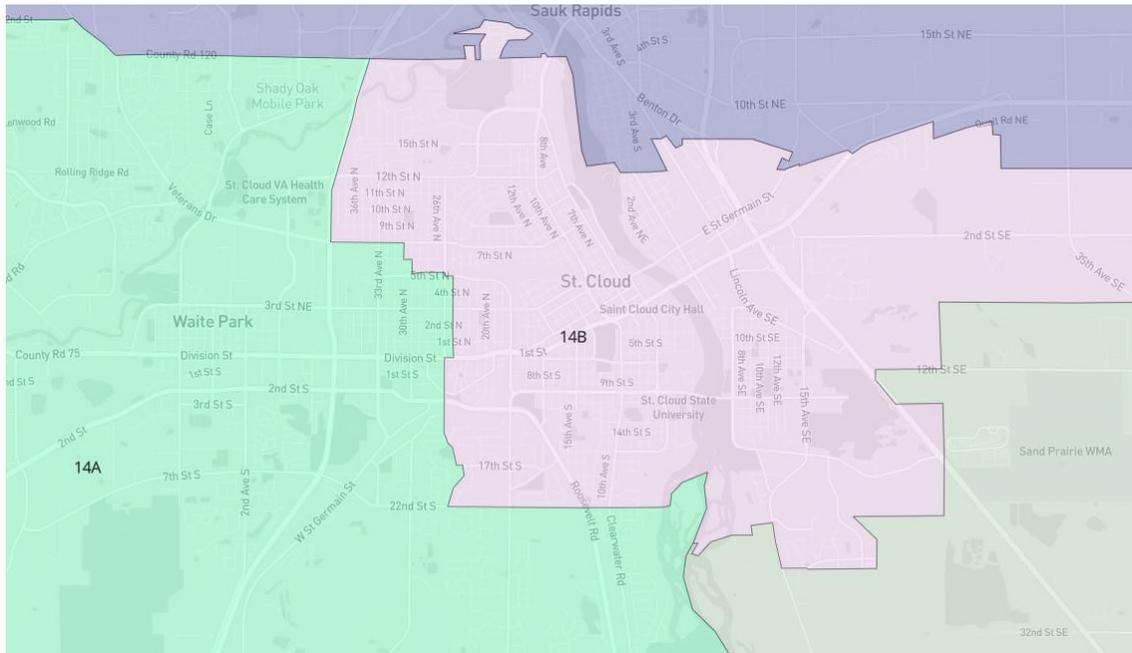
Anderson House Map – St. Cloud



Wattson House Map – St. Cloud



## Sachs House Map – St. Cloud



### **3. Southeastern Minnesota**

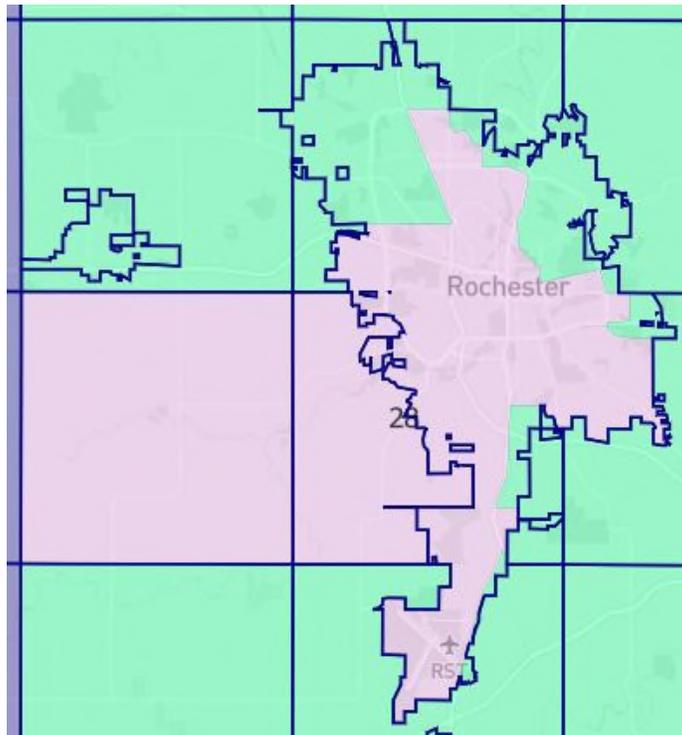
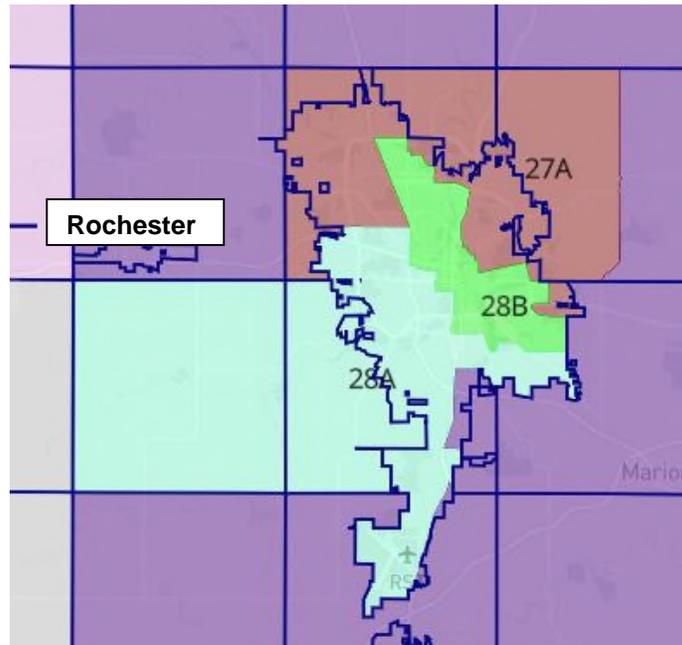
The Corrie plaintiffs’ plan most effectively abides by the Panel’s mandate to keep political subdivisions together, while also providing BIPOC communities in Minnesota’s southeastern region with the opportunity to meaningfully participate in elections. In the Corrie Plaintiffs’ extensive organizing among groups representing Minnesota’s diverse communities, our BIPOC stakeholders concluded that mapmakers should create a Minnesota House district that kept the most diverse portions of Rochester in the same house district and as much of the city in one senate district as possible.

Rochester has experienced more growth than any city in southeastern Minnesota. (See Alek LaShomb, *2002 Census Data Reveals Population Increase of More Than 13,000 for Rochester*, KIMT3 (Dec. 2, 2021), [https://www.kimt.com/archive/2020-census-data-reveals-population-increase-of-more-than-13-000-for-rochester/article\\_062034bc-5895-](https://www.kimt.com/archive/2020-census-data-reveals-population-increase-of-more-than-13-000-for-rochester/article_062034bc-5895-)

51f3-a6ee-07eb91b136a6.html.) This growth is fueled almost entirely by its BIPOC population. (U.S. Census Bureau, QuickFacts: Minnesota; Rochester, <https://www.census.gov/quickfacts/fact/table/MN,rochestercityminnesota/POP010220#POP010220>.) A redistricting plan that needlessly divides Rochester's BIPOC communities could harm the city and prevent its BIPOC communities from effectively advocating for their interests in Congress and at the Minnesota State Legislature.

Unlike other parties' Legislative Redistricting Plans, the Corrie Plaintiffs have succeeded in achieving both goals. The Corrie Plaintiffs' proposed House District 28B consists entirely of Rochester residents and is 36.9% BIPOC. In addition, 86% of the Corrie Plaintiffs' proposed House District 28A consists of Rochester residents. These House Districts combine to form Senate District 28. Although Rochester's population is too large to limit to one Senate district, 67 percent of Rochester residents (81,769 of 121,395) are united in one state senate district in the Corrie Plaintiffs' Redistricting Plan. Of the balance of the city's 39,626 residents, 36,513 are placed into House District 27A, uniting 97% of the city into 3 state house seats. If it was permissible for one state senate seat to completely surround another, the Corrie Plaintiffs would have been able to place all 100% of Rochester's population into three House districts.

Corrie Senate and House Maps - Rochester



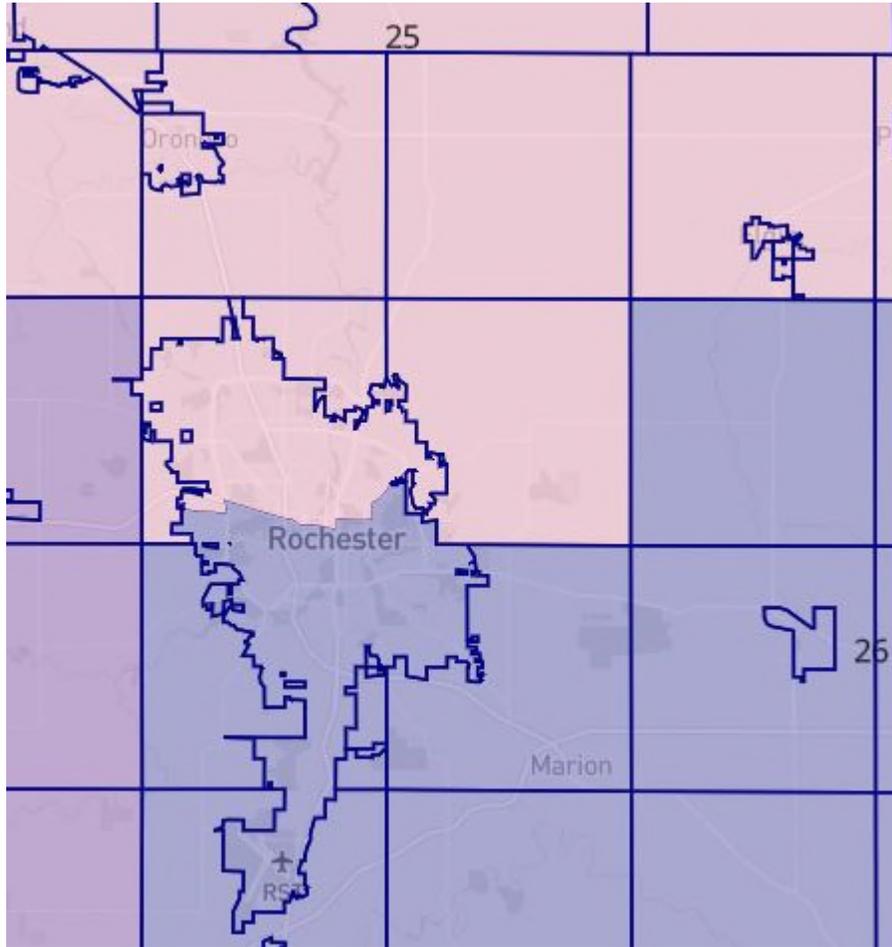
In contrast, the Wattson Plaintiffs, Anderson Plaintiffs, and Sachs Plaintiffs' Senate maps all group Rochester residents into state legislative districts with surrounding

communities in ways that dilute those residents' voting power. For example, the Anderson Plaintiffs' Senate map splits Rochester nearly evenly among two districts (Senate Districts 25 and 26), and the Sachs Plaintiffs' Senate plan divides 53.7% of Rochester residents into Senate District 25, and 46.7 % of residents into Senate District 26. No map unites Rochester more than the Corrie Plaintiffs' map, which is an essential component to properly adhering to this Panel's mandate to split minimize splits of political subdivisions. Our map also effectively empowers southeastern Minnesota's rapidly growing communities of color in the political process in a manner consistent with this growth. Rochester, with a 2020 population of 121,395, can fit 2.85 State House seats within the city proper.

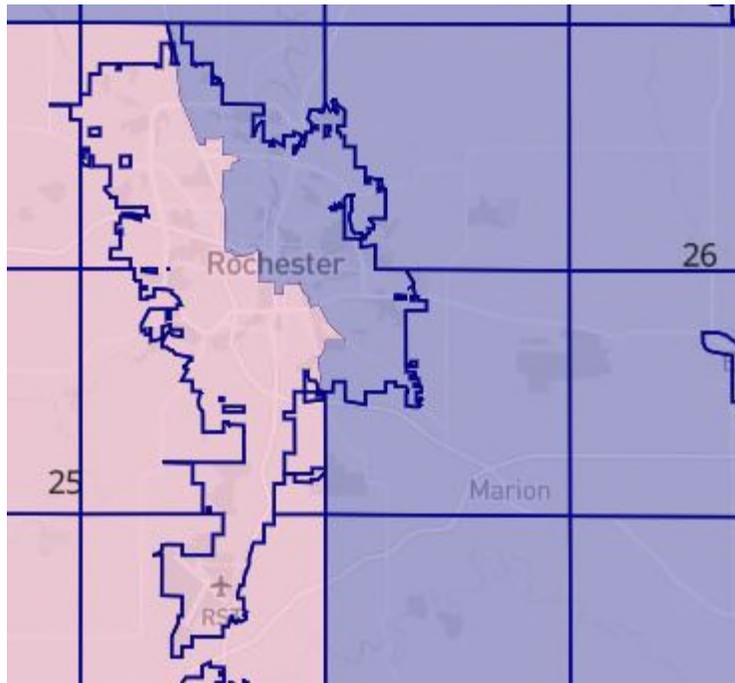
Additionally, the Anderson configuration of Rochester's State House district delegation offers a major difference from the other three plans in regards to partisan balance. Rather than a four-seat configuration where three lean to the DFL and one to the Republican Party—a realistic scenario in a county where the DFL nominees for President in 2020 and Governor in 2018 won by 11- and 12-point margins, respectively—the Anderson Plan intentionality creates two Republican-leaning seats in the county, crossing the Olmsted County line on two occasions to connect parts of Rochester with rural territory that falls outside of the county. While the Corrie, Sachs, and Wattson Plans all feature three districts wholly within Olmsted County, and for population reasons, only one district that connects to communities outside of the county, only two districts in Anderson Plan fall completely within Olmsted. Since Olmsted County has a population of 162,847 –

enough to contain 3.82 ideal House seats, there is no need for two district-border crossovers unless the goal is to create an additional Republican-leaning House seats, as their map does.

Anderson Senate Map – Rochester



## Sachs Senate Map – Rochester

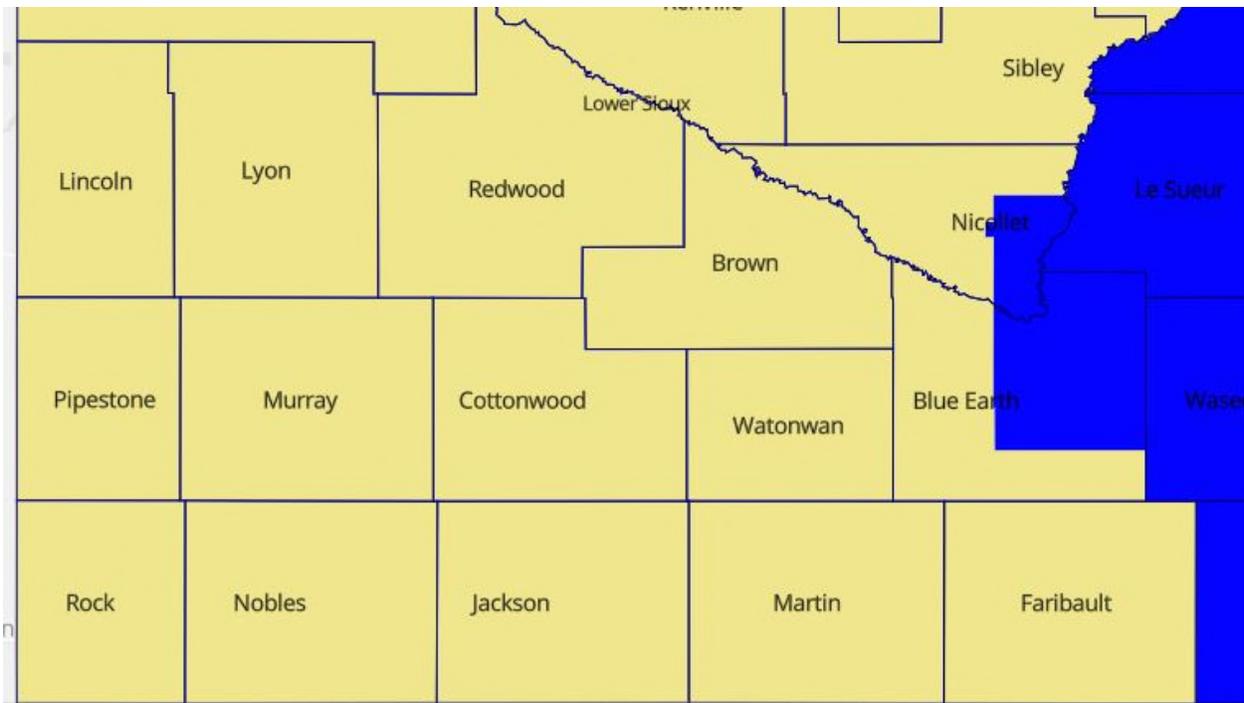


### **4. Southwestern Minnesota**

Unifying southwestern Minnesota is an important step to ensure that region's communities can effectively advocate for the resources they need. Unlike the rest of Minnesota, most of the counties in southwestern Minnesota lack the resources to provide mental health and social services to residents on their own. As a result, most counties in Southwestern Minnesota provide these services through collaboratives rather than on an individual county level. Six counties—Lincoln, Lyon, Murray, Pipestone, Redwood, and Rock—provide essential mental health and social services through the Southwest Health and Human Services. Cottonwood and Jackson Counties join forces through Des Moines Valley Health and Human Services. And Faribault and Martin Counties provide these services through Human Services of Faribault and Martin Counties.

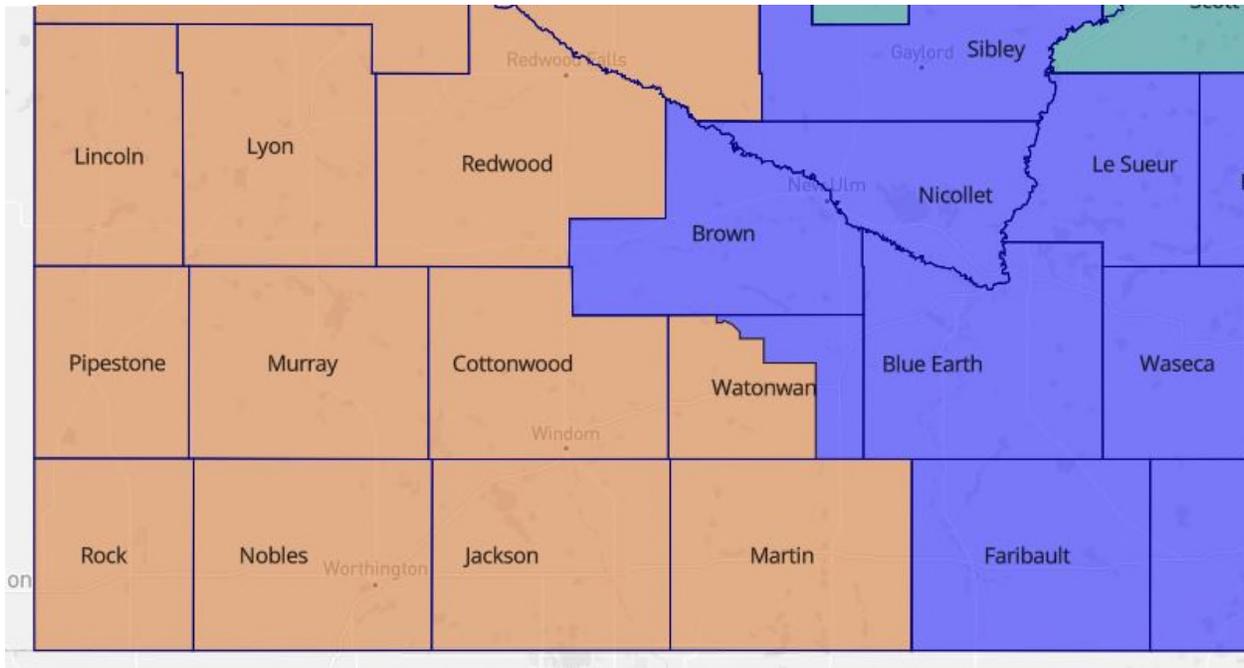
While this system allows counties to effectively pool resources, it also comes with unique challenges that require intergovernmental cooperation and a complex web of grassroots efforts that cross county boundaries to ensure adequate funding and equal access to the services these collaboratives provide. In addition, this region includes substantial numbers of Latino residents who use these services. As a result of the complexity of these collaboratives, leaders of organizations representing Latinos in southwestern Minnesota asked the Corrie Plaintiffs to draw a congressional map in which all 10 of the counties that deliver services in this manner could be united in one congressional district—the Corrie Plaintiffs Proposed 7<sup>th</sup> Congressional District. Only the Corrie plaintiffs’ map achieves this service-based unity.

Corrie Congressional Map – Southwestern Minnesota



The Sachs plaintiffs' Congressional Redistricting Plan comes the closest to the Corrie Plaintiffs' in keeping together counties whose residents rely on collaboratives for the delivery of health and social services. The Sachs Plaintiffs' map places nine of the ten counties in its proposed 7th Congressional District. Martin County is placed in its 1st Congressional District, which divides the Human Services of Faribault and Martin Counties between two congressional districts.

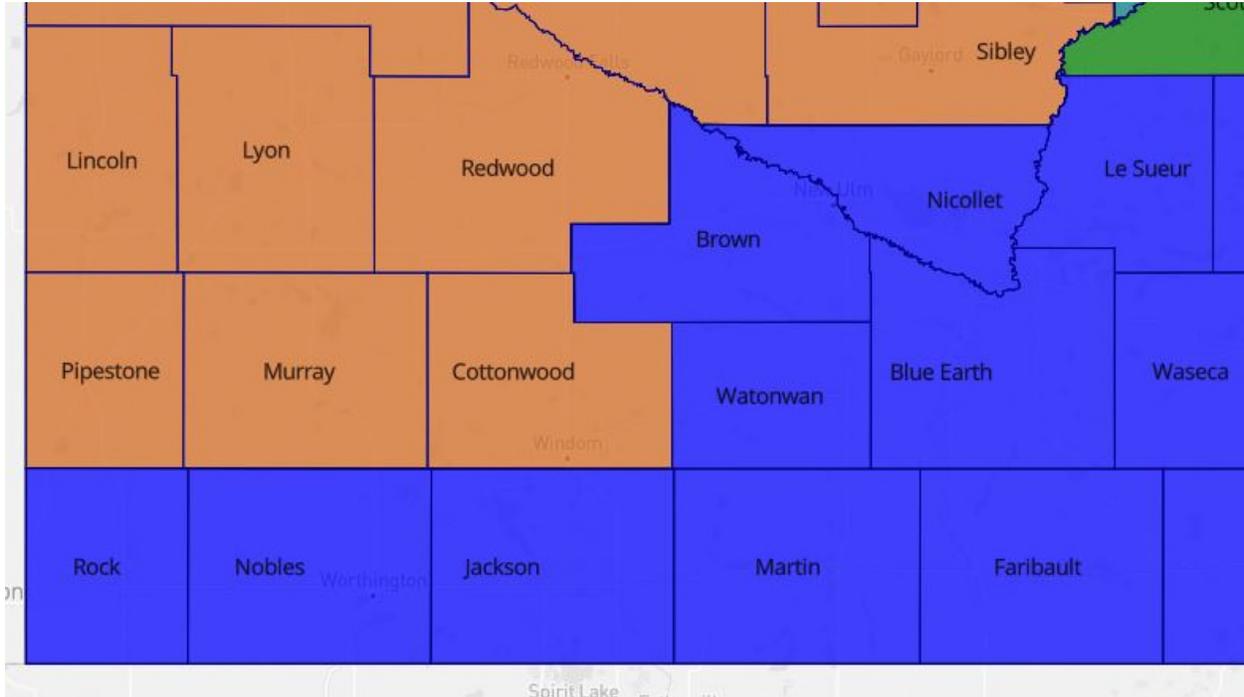
Sachs Congressional Map – Southwestern Minnesota



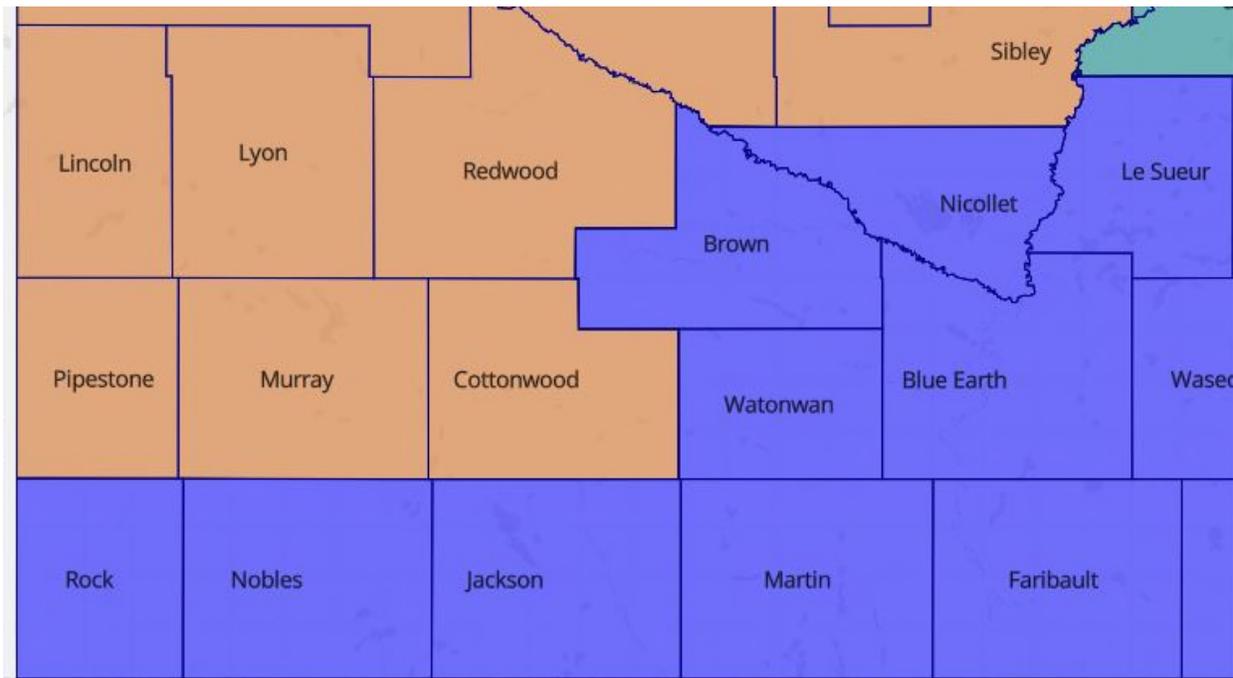
The Anderson and Wattson Plaintiffs' Congressional Redistricting Plans represent a much more significant failure to empower southwestern Minnesota communities to advocate for essential resources. In their proposed maps, six counties are placed in the 7th Congressional District while four are placed in the 1st Congressional District. The map even splits two of the collaborative groupings by placing Rock County in a different congressional district than the other five counties in the Southwest Health and Human

Services collaborative. It also places Cottonwood and Jackson Counties, the two participants in the Des Moines Valley Health and Human Services, in the 7th and 1st Congressional Districts, respectively.

Anderson Congressional Map – Southwestern Minnesota



## Wattson Congressional Map – Southwestern Minnesota



The Corrie Plaintiffs and their coalition partners organizing in southwestern Minnesota also learned that leaders in this area’s Latino community believe that keeping three cities – Worthington, St. James, and Madelia – in one Minnesota Senate district would play a crucial role in empowering that region’s residents. The Latino population of Worthington and St. James are over 42 percent Latino, and nearly one-third of Madelia residents are Latino. By combining these cities, the Corrie Plaintiffs’ Legislative Plan combines these cities into Senate District 22, which is more Latino than any senate district proposed by the other parties in Southwestern Minnesota.

### **5. Northern Minnesota/Duluth**

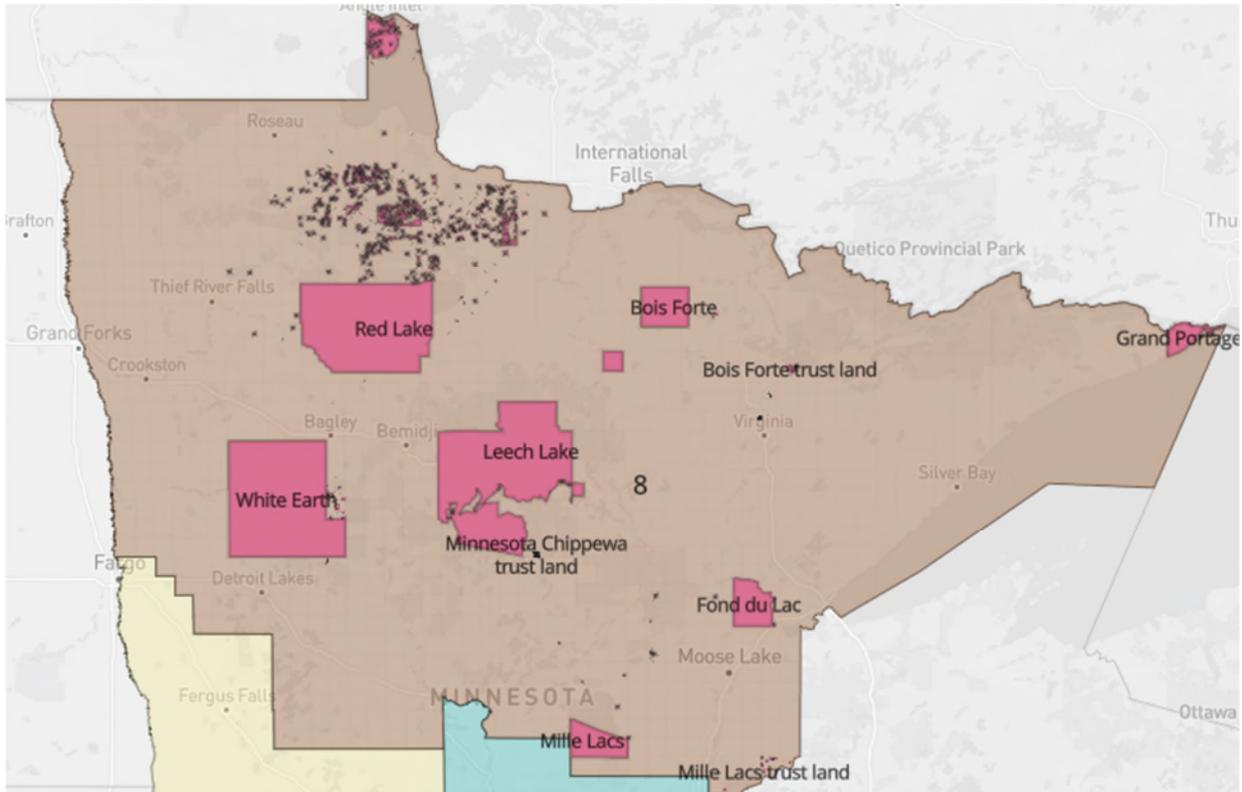
In Northern Minnesota, the Corrie Plaintiffs’ Redistricting Plan most effectively abides by the Court’s mandate to preserve federally recognized American Indian tribes and avoid division more than necessary to meet constitutional requirements. Not only does it

unite American Indian reservation and trust lands in one Congressional District (CD 8), but it also creates the only House (HD 2B) and Senate (SD 2) Districts that give American Indian populations the opportunity to elect candidates of their choice in alliance with others.

Further, based on discussions with leaders representing various nations and bands of American Indians in Minnesota, we identified specific communities that share interests and preserve them in unified districts and in a way that no other Plaintiffs do. Only the Corrie House proposal creates a Minnesota House district that 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, per the input of American Indian leaders. Corrie Senate District 2 brings the main part of tribal reservations together with surrounding trust lands into one district.

Corrie Congressional District 8 is based around the same principles of preserving all tribal lands in one district to the extent possible and based on identified communities that share interests. As the only map proposal that places all of northern Minnesota in one district, thereby bringing together the three largest American Indian reservations (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, the Corrie Congressional Map is the only map that abides by the Court's Redistricting Principles.

## Corrie Congressional Plan – Northern Minnesota/Duluth

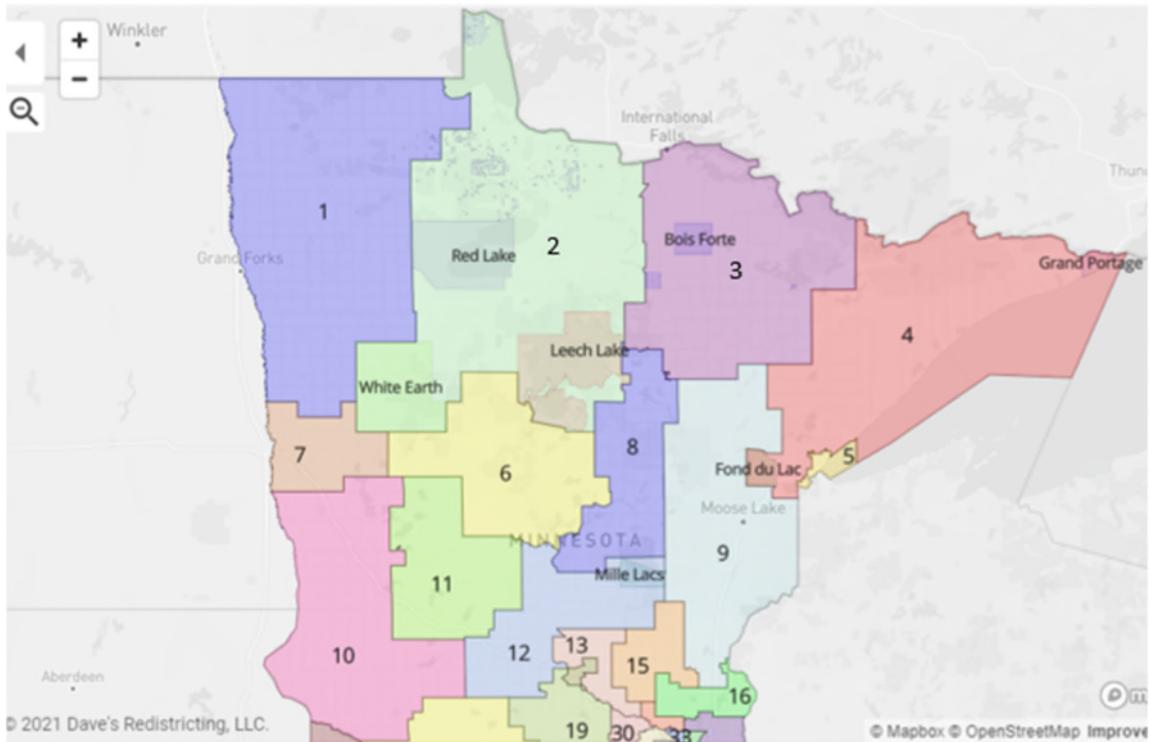


As with the Congressional Plan, the Corrie Senate and House Plans do not split any American Indian populations within contiguous reservation land and minimize splits between non-contiguous reservation lands. The Corrie House Plan centers the largest reservations in a single House District (HD 2B) and, if splits of non-contiguous land are necessary to abide by equal population rules, keeps tribal populations in House districts that nest into one Senate district wherever possible.

- No American Indian reservations are split at the congressional level.
- 100% of Bois Forte Reservation is in HD 3A and SD 3.

- 100% of Fond du Lac Reservation population is in HD 4B and SD 4, with portions of the non-contiguous and non-populated reservation land in HDs 5A and 9B, and SDs 5 and 9.
- 100% of Grand Portage Reservation is in HD 4A and SD 4.
- 100% of the Leech Lake Reservation population is in House District 2B, with portions of the non-contiguous and non-populated reservation lands in HD 2A, 6A, 6B, and 8A. 100% of the Leech Lake Reservation population is in Senate District 2, with portions of the non-contiguous and non-populated reservation lands in SD 6 and 8.
- 100% of the main Mille Lacs Reservation is in House District 12A and Senate District 12, and non-contiguous reservation lands are in three House districts (HDs 8A, 9A, and 9B) and two Senate districts (SD 8 and 9).
- Minnesota Chippewa consists of a number of non-contiguous lands, none of which are split. The non-contiguous lands are in five House districts (HDs 2A, 3A, 3B, 6A, and 10A) and four Senate districts (SDs 2, 3, 6, and 10).
- 100% of the main part of Red Lake Reservation (with 99.98% of the population) is in House District 2B, with remaining non-contiguous reservation lands in HDs 1A, 1B, and 2A. 100% of Red Lake Reservation population is in Senate District 2, with portions of the non-populated, non-contiguous lands in SD 1.
- 100% of White Earth Reservation is in HD 2B and SD 2.

Corrie Senate Plan – Northern Minnesota/Duluth



In presenting a “least change” map, Wattson de-prioritizes minimizing splits of American Indian tribal lands and makes no effort to protect the voting opportunities of American Indians to elect candidates of their choice in alliance with others. The Wattson Congressional Plan splits northern Minnesota into eastern and western districts, and as a result, splits the Red Lake Indian Reservation lands into two congressional districts (CD 7 and CD 8) and splits Minnesota Chippewa lands into two districts (CD 7 and 8). (Wattson Congressional Mapitude Reports, Exhibit C-5).

The Wattson configuration of House and Senate districts in northern Minnesota splits four American Indian reservations: Leech Lake; Mille Lacs; Minnesota Chippewa; and Red Lake. Mille Lacs Indian Reservation lands are split into four House districts (HDs 5B (populated), 9A, 10B (populated), and 11B (populated)) and four Senate districts (SDs

5, 9, 10, and 11). While the placement of non-contiguous lands into different districts may be necessary, the Corrie Plan minimizes the division by intentionally nesting the House districts that Mille Lacs lands are divided into resulting in three Senate districts rather than four. Where Wattson splits Minnesota Chippewa lands into five House (HDs 2A, 4A, 5A, 6B, 8A) and five Senate districts (SDs 2, 4, 5, 6, 8), the Corrie Plan minimizes the division in Senate districts through nesting to four Senate districts. Where Wattson splits Red Lake Nation lands into four House districts (HDs 1A, 1B, 2A, and 4) and three Senate districts (SDs 1, 2, and 4), the Corrie Maps use nesting to reduce the division at the Senate level to two districts. (See Wattson House Maptitude Reports, Exhibit E-5, and Wattson Senate Maptitude Reports, Exhibit D-5).

Similar to Wattson, the Anderson Congressional Plan makes no particular effort to minimize divisions of American Indian populations or to create an opportunity district for these communities. The Anderson Congressional Plan proposes splitting northern Minnesota into a western congressional district (CD 7) and an eastern one (CD 8). This results in splitting Red Lake Indian Reservation lands into two congressional districts (CDs 7 and 8) and Minnesota Chippewa Tribe lands into two congressional districts (CDs 7 and 8).

Unlike Corrie Plaintiffs' Congressional Plan, which unifies the northern Minnesota American Indian tribal populations into one congressional district, the Anderson Congressional Map places the Red Lake Nation and White Earth Nation Reservations into Congressional District 7, separate from Leech Lake Band of Ojibwe Reservation, Grand Portage Band of Lake Superior Chippewa, Bois Forte Band of Chippewa, Fond du Lac,

and Mille Lacs Band of Ojibwe Reservations, which are in CD 8. (Anderson Congressional Maptitude Reports, Tab F).

The Anderson configuration of House and Senate Maps in northern Minnesota splits five American Indian reservations:

- Bois Forte Reservation is split into three House districts (HDs 2A, 2B and 3A) and two Senate districts (SD 2 and 3);
- Fond du Lac Indian Reservation is split into two House districts (HD 7A and 8A) and two Senate districts (SD 7 and 8);
- Mille Lacs is split into three House districts (HD 6B, 7B, and 11B) and three Senate districts (SD 6, 7, and 11);
- Minnesota Chippewa is split into five House districts (HD 2B, 3A, 4A, 5A, and 10A) and five Senate Districts (SD 2, 3, 4, 5, and 10); and
- Red Lake Indian Reservation is split into three House districts (HD 1A, 1B, and 2A) and two Senate districts (SD 1 and 2).

(See Anderson Legislative Maptitude Reports, Tab P; Anderson Legislative Maptitude Reports, Tab F).

The Sachs Congressional Plan fares no better in abiding by the Panel's order to preserve American Indian tribes. For example, like Anderson, the Sachs Congressional Plan splits northern Minnesota into a western congressional district (CD 7) and an eastern one (CD 8). The Sachs Congressional plan also splits three American Indian reservations in two:

- Leech Lake Band of Ojibwe Reservation is between CDs 7 and 8;

- Red Lake Indian Reservation is split between CDs 7 and 8; and
- Minnesota Chippewa Tribe Reservation is split between CDs 7 and 8.

Additionally, the Sachs Congressional Plan separates Red Lake Nation and White Earth Nation into a district (CD 7) that is separate from the Leech Lake Band of Ojibwe Reservation, the Grand Portage Band of Lake Superior Chippewa, the Bois Forte Band of Chippewa, the Fond du Lac Band of Lake Superior Chippewa, and the Mille Lacs Band of Ojibwe (CD 8). (Sachs Congressional Indian Reservation Report).

The Sachs configuration of House and Senate Maps in northern Minnesota splits five American Indian reservations:

- Bois Forte Reservation is split into two House districts (HDs 3A and 5A) and two Senate districts (SDs 3 and 5).
- Fond du Lac Indian Reservation is divided into two House districts (HDs 6B and 7B) and two Senate districts (SDs 6 and 7).
- Mille Lacs into divided into four House districts (HDs 5A, 5B, 11A, and 11B) and two Senate districts (SDs 5 and 11).
- Minnesota Chippewa is divided into five House districts (HDs 2B, 3A, 6A, 6B, and 8A) and four Senate districts (SDs 2, 3, 6, and 8).
- Red Lake Indian Reservation is divided into four House districts (HDs 1A, 1B, 2A, and 3A) and three Senate districts (SDs 1, 2, and 3).

(See Sachs House Tribal Splits Report and Sachs Senate Tribal Splits Report).

As the Corrie Plaintiffs' Congressional Redistricting Plan demonstrates, it is possible to create a relatively equipopulous, contiguous, and compact district (CD 8) that

holds together the towns, cities and American Indian populations of northern Minnesota. The Corrie House and Senate maps also demonstrate a viable plan to unite the most populous American Indian reservations into a single House district (HD 2B) and to use intentional nesting to minimize splits at the Senate level (SD 1, 2, 3, 4, 6, and 9).

**G. Compactness**

The Corrie Plaintiffs Congressional and Legislative Redistricting Plans have extremely strong compactness scores (first or second highest Reock and Polsby-Popper scores) compared to the other parties’ Congressional and Legislative Redistricting Plans. In addition, all of the Corrie Plaintiffs’ maps also satisfy or exceed the compactness benchmarks set out in the *Brief Submitted by Amici Curiae Citizen Data Scientists*.

|               | CONGRESS    |             | HOUSE       |             | SENATE      |             |
|---------------|-------------|-------------|-------------|-------------|-------------|-------------|
| PLAN          | Reock       | Polsby      | Reock       | Polsby      | Reock       | Polsby      |
| <b>Watt.</b>  | 0.39        | 0.27        | 0.42        | 0.38        | 0.45        | 0.40        |
| <b>And.</b>   | 0.42        | 0.33        | 0.44        | 0.43        | 0.42        | 0.40        |
| <b>Sachs</b>  | 0.44        | 0.35        | 0.43        | 0.39        | 0.43        | 0.37        |
| <b>Corrie</b> | <b>0.43</b> | <b>0.37</b> | <b>0.45</b> | <b>0.41</b> | <b>0.44</b> | <b>0.39</b> |

While compactness of districts is a subordinate principle, the fact that all three of the Corrie Plaintiffs’ maps are able to protect minority voting rights, preserve American Indian reservations, respect communities of interest, *and* be relatively compact offers the Court a set of maps that complies with all of its principles.

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

The Corrie Plaintiffs Redistricting Plans were not drawn with the purpose or effect of protecting, promoting, or defeating incumbents or political parties. The Corrie Plaintiffs are not affiliated with any political party and did not rely on any data during the map

drawing process regarding the residences of incumbents or the impact of their maps on political parties. The same cannot be said of the other parties.

The Wattson Plaintiffs, for example, admit that they relied on incumbent-related data in drawing their Plans. Although they attempt to justify such reliance by arguing, for example, that their treatment of incumbents does not negatively impact minority voting in their House Plan, they nonetheless violate the Panel's Principles Order. In addition, the Anderson Plaintiffs have (appropriately) drawn criticism that their Plans were drawn with the purpose and effect of unduly favoring the Republican Party. (*See, e.g., supra* Section F(3).)

## II. Conclusion

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

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