

**FILED**

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STATE OF MINNESOTA  
SPECIAL REDISTRICTING PANEL

December 7, 2021

OFFICE OF  
APPELLATE COURTS

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

**AFFIDAVIT OF NICK HARPER IN  
SUPPORT OF THE WATTS  
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,

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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STATE OF MINNESOTA )  
  ) ss.  
COUNTY OF HENNEPIN)

Nick Harper, being first duly sworn, deposes and states as follows:

1. I am the Civil Engagement Director for Plaintiff League of Women Voters Minnesota in the above-captioned matter and make this Affidavit in support of the Proposed Congressional and Legislative Redistricting Plans of Plaintiffs 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 (“Wattson Plaintiffs”).

2. In my role as Civic Engagement Director, I advise our organization’s members and volunteers on nonpartisan voter engagement and lead our staff advocacy efforts. Part of this work includes working with other organizations on civic engagement

opportunities, including nonpartisan candidate forums and voter registration, civic education, legislative advocacy, and litigation. During the last several years, these efforts have included education and engagement on census and redistricting to encourage Minnesotans to participate in the apportionment and redistricting process.

3. In the Wattson Plaintiffs' Senate redistricting plan, we have created Senate District 62 that attempts to encompass the East African community in the Cedar Riverside and Phillips neighborhoods in Minneapolis.

4. Throughout the summer and fall of 2021, multiple organizations in Minnesota drew community of interest maps to identify, describe, and geographically place their communities for the state and local redistricting processes.

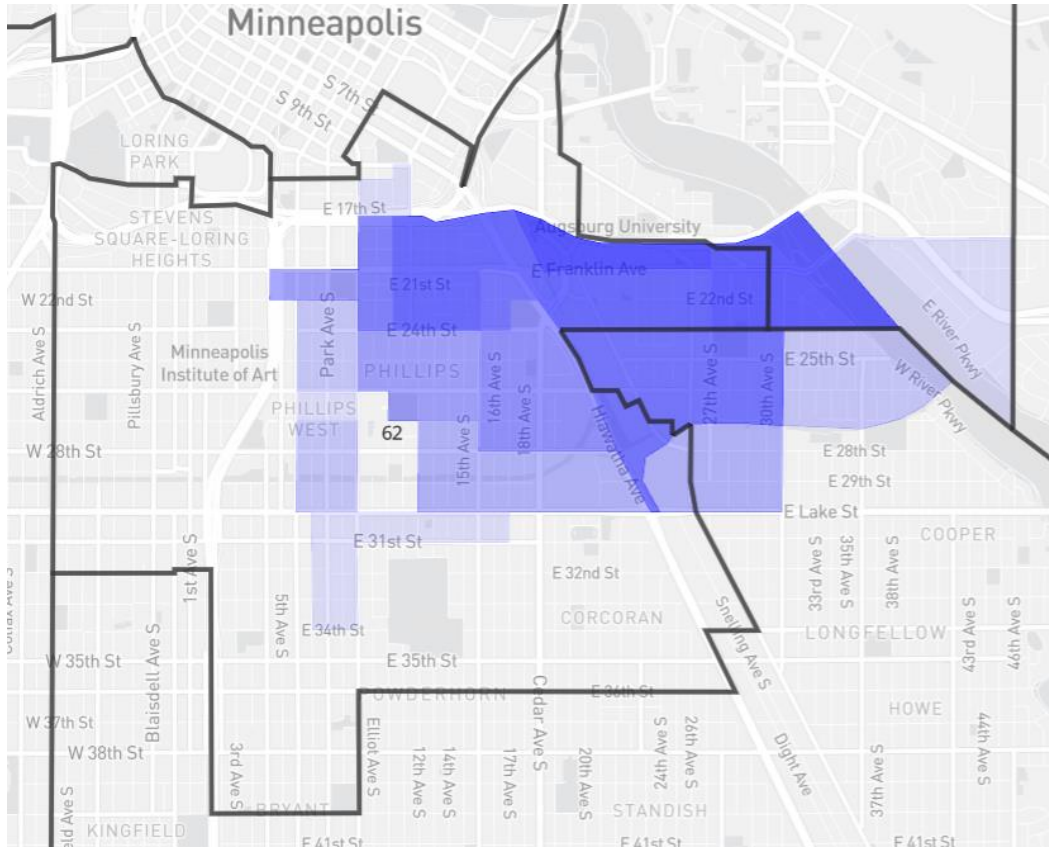
5. In August 2021, the Islamic Civic Society of America (ICSA), Pillsbury United Communities (PUC), and the Minnesota chapter of the Council on American Islamic Relations (CAIRMN) held a combined total of at least ten mapping sessions with each of their constituents. These maps and community descriptions identified a strong East African community in the Cedar Riverside and Phillips neighborhoods in Minneapolis.

6. I attended two of these community mapping sessions to observe, help take notes, and provide technical mapping assistance with Districtr, an online mapping tool used to create and describe communities of interest. Some of these mapping sessions were assisted by League volunteers, including Paul Huffman, Redistricting Coordinator. The mapping sessions were led and facilitated, however, by community leaders chosen by the sponsoring organizations.

7. During these meetings, community members identified their community and

shared interests and characteristics. I have also reviewed the description of each map, as well as used word and phrase frequency analysis of the descriptions to determine common themes among them. Members of the community are Black residents of Minneapolis. They are primarily immigrants from eastern Africa like Somalia and Ethiopia or are descendants from recent immigrants. Many speak a language other than English, such as Somali, Amharic, or Oromo. Many are Muslim, observe religious holidays, and practice daily prayers. These members of the community also identified many shared policy issues that they have concerns about, including health and human services, housing, education, and law enforcement and public safety. And because the community has a strong cultural focus on community and family, many of the community members are particularly concerned about how these policy areas affect the children and young members of their community.

8. The ten maps below identify geographic areas of Minneapolis, some pieces which overlap and some which do not. After analyzing these maps by overlaying them on top of each other, I have determined that SD 62 reflects the precincts in Minneapolis that were most agreed upon as being geographically part this community. This community was split between at least two senate districts during the last redistricting cycle (Senate Districts 62 and 63). An image overlaying these maps with the Wattson Plaintiffs' SD 62 is included below.



The above referenced maps are available at:

<https://districtr.org/edit/60050?event=ourmapsmn>

<https://districtr.org/edit/41090?event=ourmapsmn>

<https://districtr.org/edit/39877?event=ourmapsmn>

<https://districtr.org/edit/38605?event=ourmapsmn>

<https://districtr.org/edit/37604?event=ourmapsmn>

<https://districtr.org/edit/37034?event=ourmapsmn>

<https://districtr.org/edit/36850?event=ourmapsmn>

<https://districtr.org/edit/35874?event=ourmapsmn>

<https://districtr.org/edit/35092?event=ourmapsmn>

<https://districtr.org/edit/33912?event=ourmapsmn>

9. Portions of the overlays were excluded from the Wattson Plaintiffs' SD 62 because those precincts were not agreed upon as common geographic areas by the community and because the White Voting Age Population for those precincts were significantly higher than Black Voting Age Population. One of these precincts is Minneapolis Ward 2 Precinct 9, the southern portion of which is the western riverbank near E. Franklin Ave. This precinct is only 13.0% Black VAP, but 76.1% White VAP. The other precinct is Minneapolis Ward 2 Precinct 2, covering the southern portion of the Seward neighborhood between E. 24th St. and E. 27th St. This precinct is only 7.7% Black VAP, but 80.8% White VAP. Therefore, including those precincts in SD 62 would have diluted the Black Voting Age Population.

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 3, 2021

/s/ Nick Harper  
Nick Harper

Hennepin County, Minnesota  
County and state signed