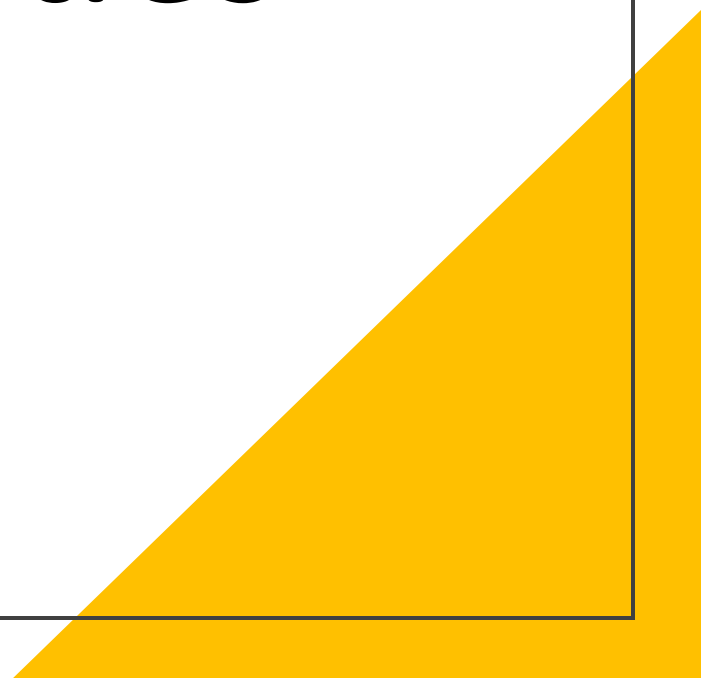


The Corrie Plaintiffs' Response to the Parties' Redistricting Plans

January 4, 2022

Oral Argument

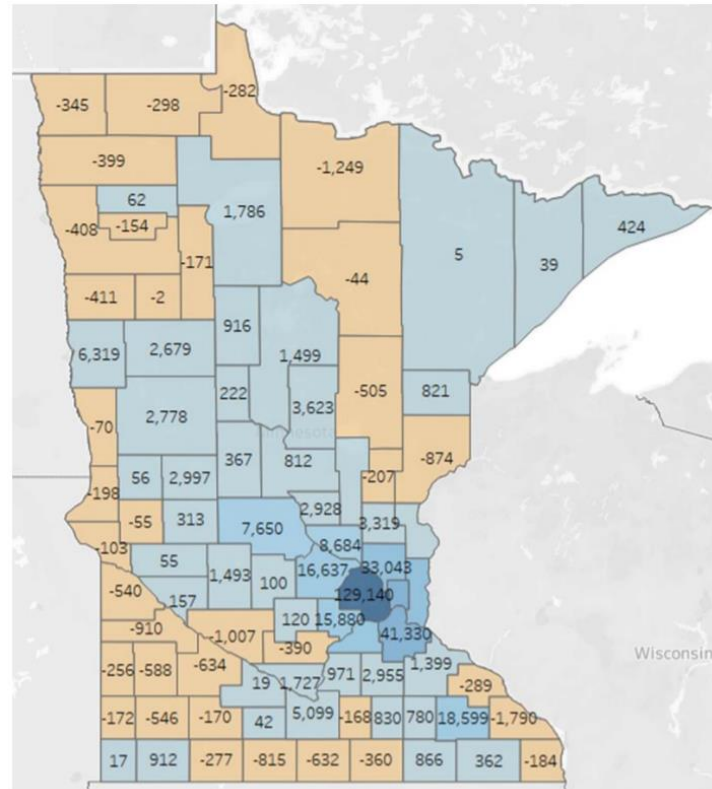
Special Redistricting Panel



Approaches to Redistricting

Wattson	Anderson	Sachs
<ul style="list-style-type: none">• "Least change" approach, making as little changes as possible to the <i>Hippert</i> Plan and failing to account for Minnesota's population changes• Took pains to identify the residence of incumbents and ensure each would be protected• IGNORES the Panel's rejection of the "least change" philosophy and adoption of a political fairness principle	<ul style="list-style-type: none">• Focused on advancing partisan interests; specifically, Republican party advantage• Like Wattson Plaintiffs, pursue a "least change" approach• In doing so, they DOWNPLAY the substantial population and demographic changes and sacrifice the rights and interests of minority voters• Remain dismissive of communities of interest, suggesting they are "difficult to discern" if they are anything but a political subdivision	<ul style="list-style-type: none">• Also used the maps adopted by the <i>Hippert</i> Panel as a starting point and made adjustments from there to achieve population equality• BUT the Sach Plaintiffs DID<ul style="list-style-type: none">○ take public testimony into account;○ make changes to features of existing districts that no longer make sense in light of demographic, economic, or other developments; and○ Recognize important communities of interest

Population Growth in Minnesota Between 2010 and 2020 Was Not Evenly Distributed



Numeric Change, Total Population, 2010-2020

Largest Gains (Numeric)

Rank	County	Numeric change	Percentage Change
1	Hennepin	129,140	11.2%
2	Ramsey	43,712	8.6%
3	Dakota	41,330	10.4%
4	Anoka	33,043	10.0%
5	Washington	29,432	12.4%

Largest Losses (Numeric)



83	Pine	(874)	-2.9%
84	Yellow Medicine	(910)	-8.7%
85	Renville	(1,007)	-6.4%
86	Koochiching	(1,249)	-9.4%
87	Winona	(1,790)	-3.5%

Source: U.S. Census Bureau, 2010 and 2020 Censuses


The Corrie Plaintiffs' Plan,
Accounts for
Population
Changes in
Minnesota
from
2010-2020

**The Corrie Plaintiffs' Plan recognizes
Minnesota's Growing and Diverse
Population Centers in the Southeast,
Central Minnesota, and Twin Cities:**

- Legislative Plan keeps the most diverse portions of Rochester in the same house district and the majority of the City of Rochester in the same senate district;
- Congressional Plan united increasingly diverse St. Cloud micropolitan area; and
- Legislative Plan includes senate and house districts in St. Paul's growing East Side that were drawn to ensure the area's growing Southeast Asian community is able to elect candidates of their choice



The Corrie Plaintiffs Redistricting Plan Meets or Exceeds Each of the Redistricting Principles Adopted by the Panel

1. Ideal Population
 2. Minority Voting Rights
 3. American Indian Reservations
 4. Convenient, Contiguous Districts
 5. Political Subdivisions
 6. Communities of Interest
 7. Compactness
 8. Partisan Bias
- 

Other Parties Relied on Principles That Were Explicitly Rejected by the Panel

The Wattson Plaintiffs' Redistricting Plan

- Incumbent protection;
- Ensuring political competitiveness based on past election results;
- Preserving precincts as political subdivisions; and
- Preserving cores of districts

The Anderson Plaintiffs' Redistricting Plan

- Incumbent protection;
- Partisanship data; and
- The 5/3 "Rule"

Ideal Population

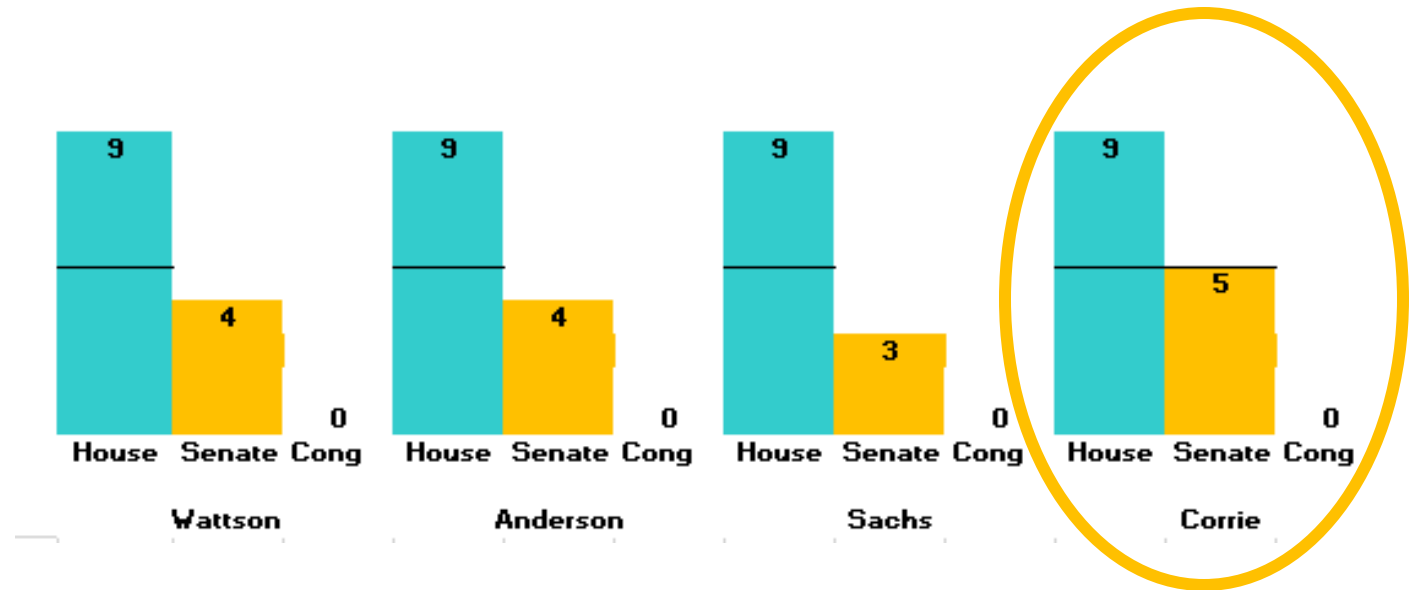
	CONGRESS		SENATE		HOUSE	
PLAN	Total Deviation	Mean Deviation	Total Deviation	Mean Deviation	Total Deviation	Mean Deviation
Watts.	0.00%	0.00%	3.83%	0.77%	3.96%	0.99%
Ander.	0.00%	0.00%	1.90%	0.45%	1.98%	0.56%
Sachs	0.00%	0.00%	1.95%	0.42%	1.98%	0.56%
Corrie	0.01%	0.00%	0.91%	0.15%	1.12%	0.24%

Minority Voting Rights

Corrie Plaintiffs' Redistricting Plans created:

- 9 House districts with more than 50% minority population
- 5 Senate districts with more than 50% minority population

The Corrie Plaintiffs' Redistricting Plan Creates More Majority-Minority Districts Than Any Other Party's Plan

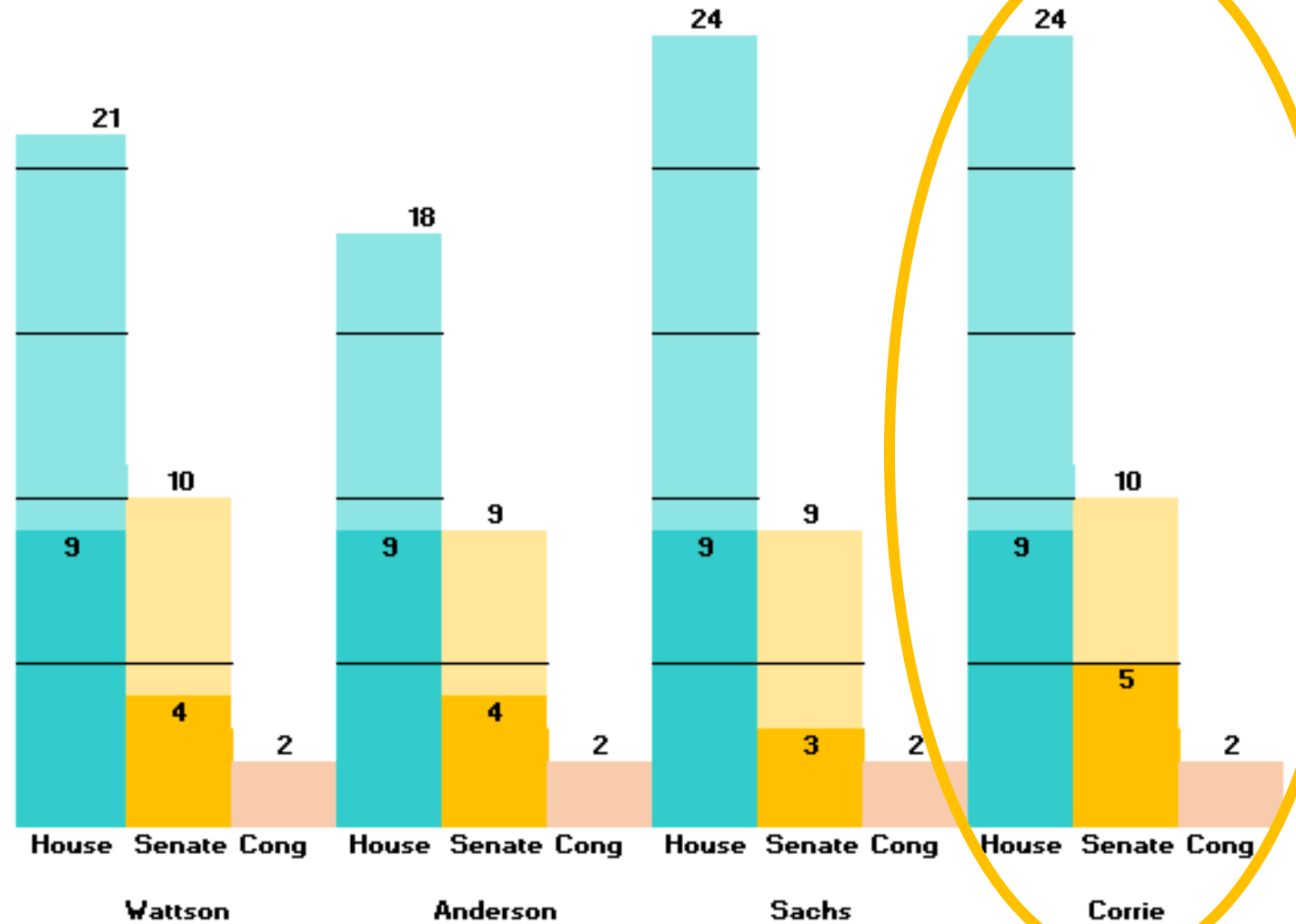


Minority Voting Rights

The Corrie Plaintiffs' Redistricting Plan created:

- 24 House districts with more than 30% minority population
- 10 Senate districts with more than 30% minority population
- 2 Congressional districts with more than 30% minority population

The Corrie Plaintiffs' Redistricting Plan Creates More Opportunity Districts Than Any Other Party



American Indian Reservations

The Corrie Plaintiffs' Plan Most Effectively Abides by the Court's Mandate to Preserve Minnesota's American Indian Reservations and Takes Into Consideration the Desires of American Indians

- Congressional Plan unites major American Indian reservations—Red Lake Nation, White Earth Nation, and Leech Lake Band of Ojibwe) in a Northern District (CD8)
- Creates house (HD2B) and senate (SD2) districts that give Minnesota's American Indian populations the opportunity to elect candidates of their choice in alliance with others

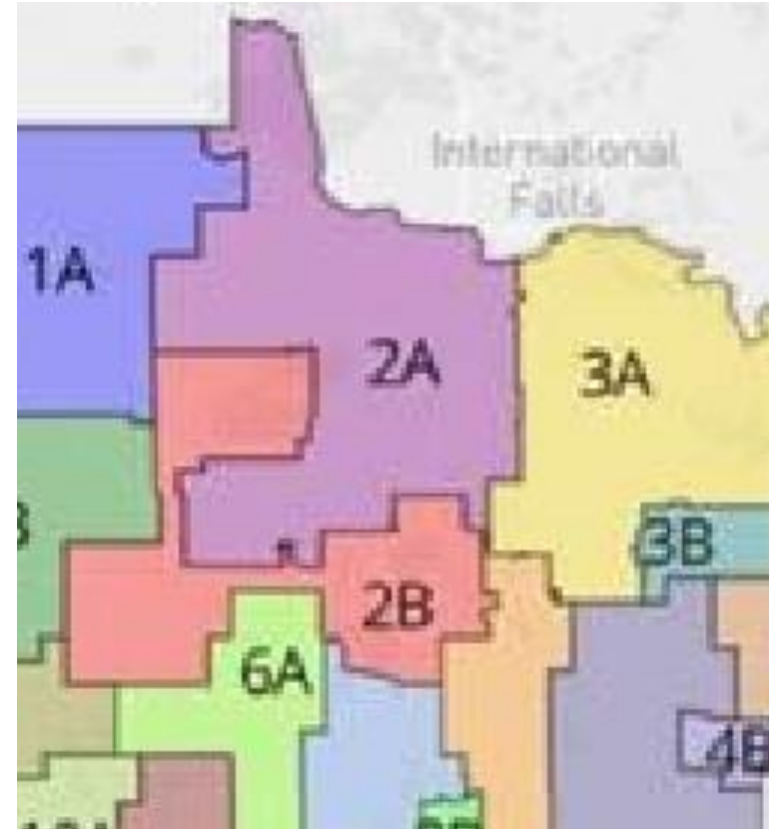
The Other Parties Plans Fail to Preserve American Indian Reservations at the Same Magnitude

Convenient, Contiguous Districts

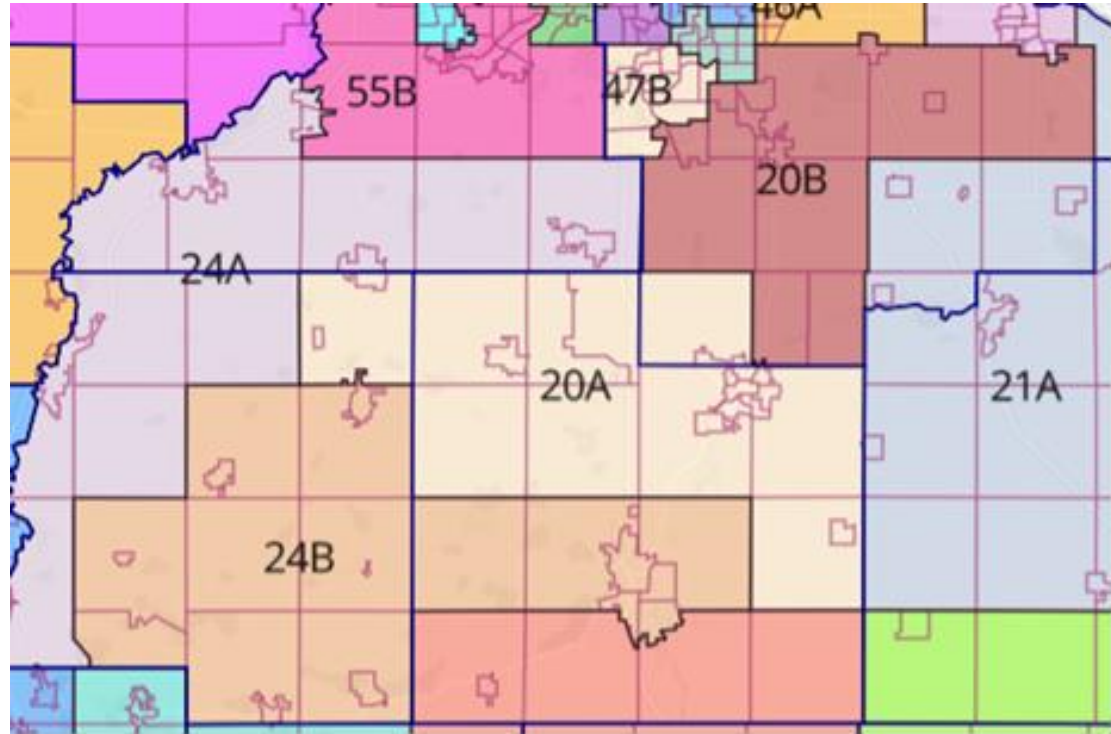
House Districts 2B, 14B, 27B,
50A and 50B, and Senate
District 20

House District 2B

House District 2B was drawn to comply with the American Indian Reservations Principle and at the Request of the American Indian tribes, who have been historically excluded from the representation they deserve

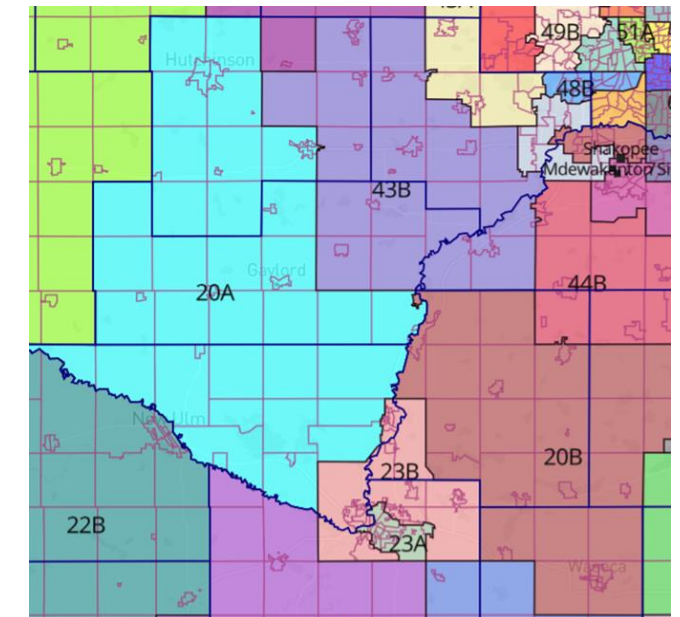
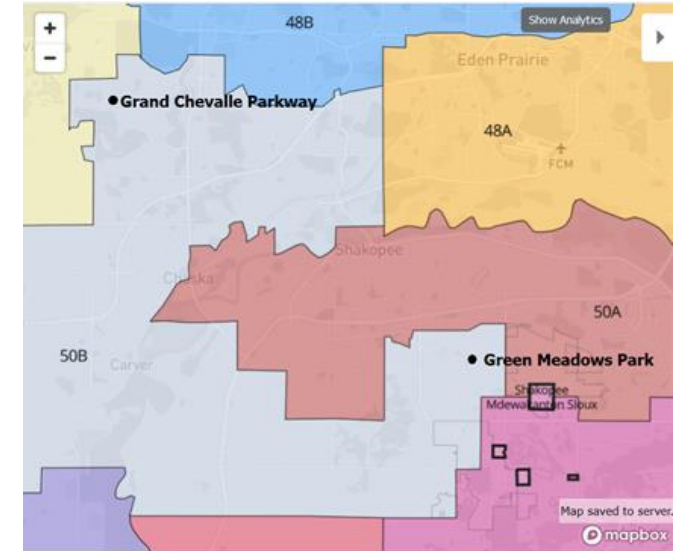


The Sachs
Plaintiffs'
Legislative Plan
also includes
districts that are
connected by a
single precinct
line

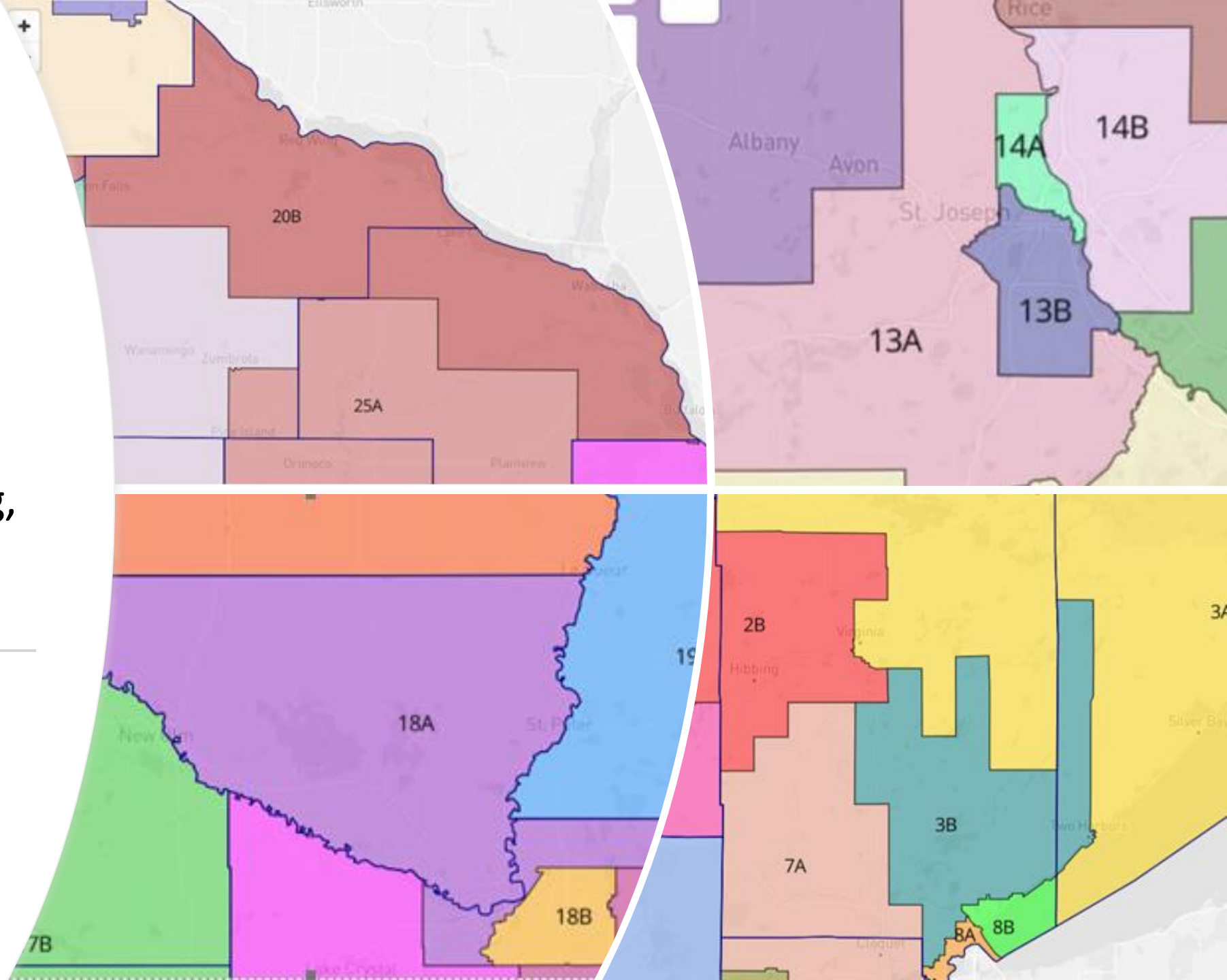


House Districts 50A and 50B, and Senate District 20 comply with the Convenient, Contiguous Principle

- House Districts 50A and 50B preserve the Latino and Hispanic communities in Shakopee, Jackson Township, and Chaska
- Measuring from the furthest points, it takes only 20 minutes to traverse House District 50A and only 21 minutes to traverse House District 50B
- In Senate District 20, which spans only 12 miles of the Minnesota River, there are three different roads by which you can cross the River—Minnesota State Highway 19, U.S. 169, and Minnesota State Highway 93



The Anderson Plaintiffs' Legislative Plan Includes districts that are more difficult to traverse, more sprawling, and that cross the Minnesota River



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	25	154	121	236	210

Communities of Interest

The Corrie Plaintiffs' Redistricting Plan is the only Plan that centers communities of interest.

- The Anderson Plaintiffs, in contrast, are dismissive of communities of interest, arguing that communities of interest are impossible to discern.
- In addition, the Anderson Plaintiffs improperly conflate communities of interest with political subdivisions and American Indian reservations, missing the mark and failing to comply with the communities of interest principle.

Compactness

The Corrie Plaintiffs' Redistricting Plans Have Strong Compactness Scores

	CONGRESS		HOUSE		SENATE	
PLAN	Reock	Polsby	Reock	Polsby	Reock	Polsby
Watt.	0.39	0.27	0.42	0.38	0.45	0.40
And.	0.42	0.33	0.44	0.43	0.42	0.40
Sachs	0.44	0.35	0.43	0.39	0.43	0.37
Corrie	0.43	0.37	0.45	0.41	0.44	0.39

(Higher Scores are More Compact)

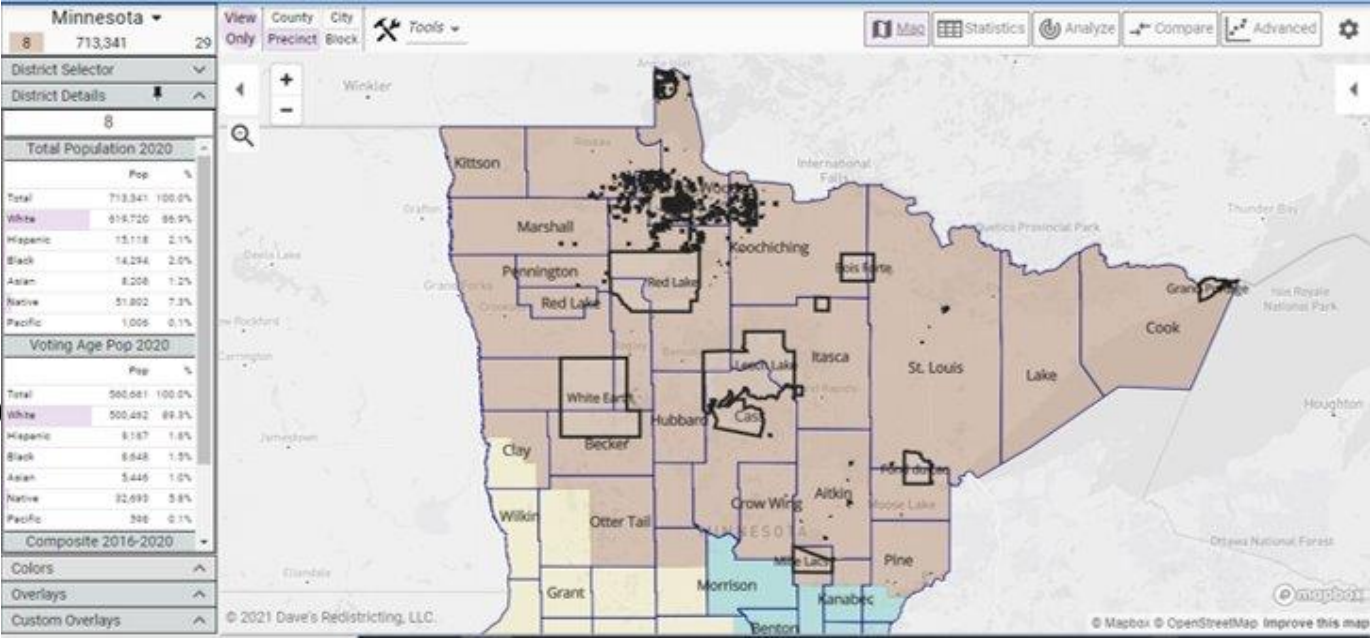
Partisan Bias

- Contrary to the Panel's Redistricting Principles Order, both the Wattson Plaintiffs and the Anderson Plaintiffs improperly rely on partisan data and seek to protect incumbents
- Neither the Anderson Plaintiffs nor the Sachs Plaintiffs provide any transparency as to how their redistricting plans were created

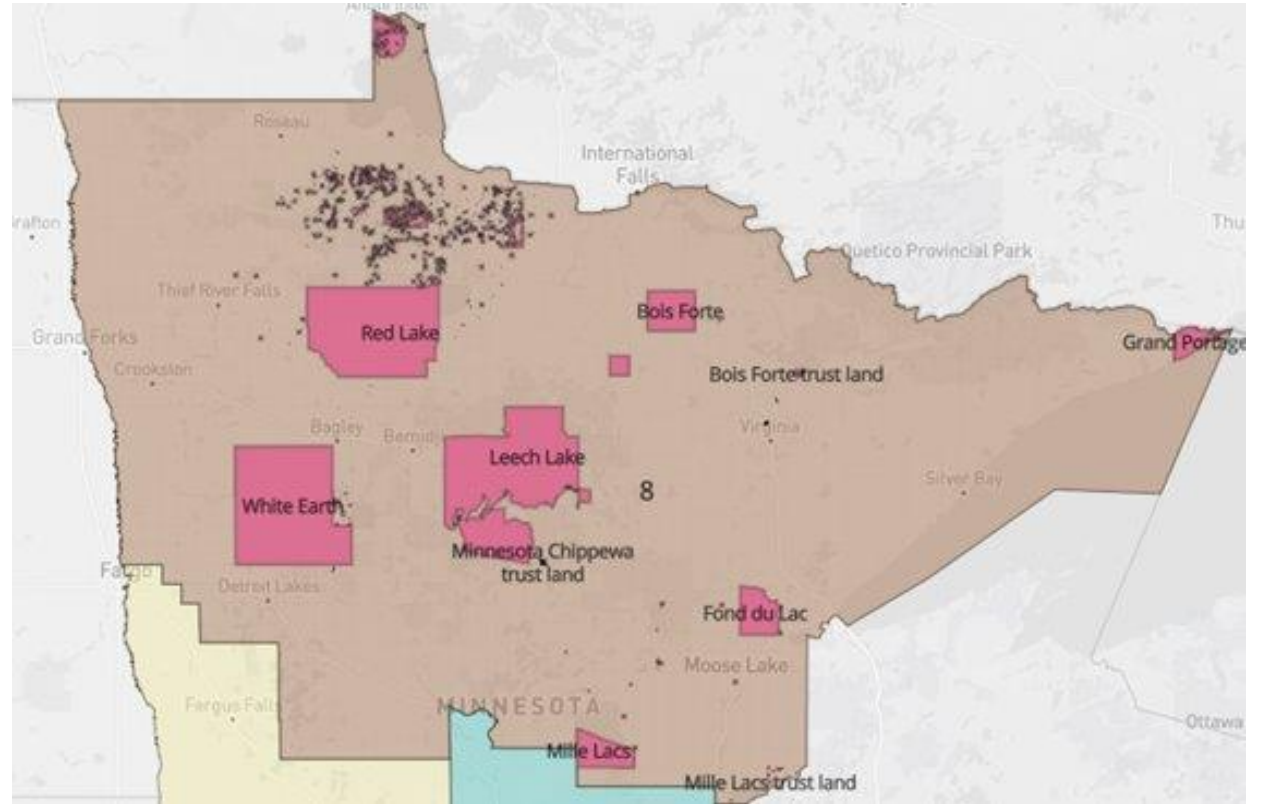
A blue ribbon graphic with a folded end on the left side, containing white text.

The Parties' Redistricting Plans

The Carrie Plaintiffs' Eighth Congressional District



The Corrie Plaintiffs' Eighth Congressional District most effectively abides by the Panel's mandate to preserve federally recognized American Indian Reservations

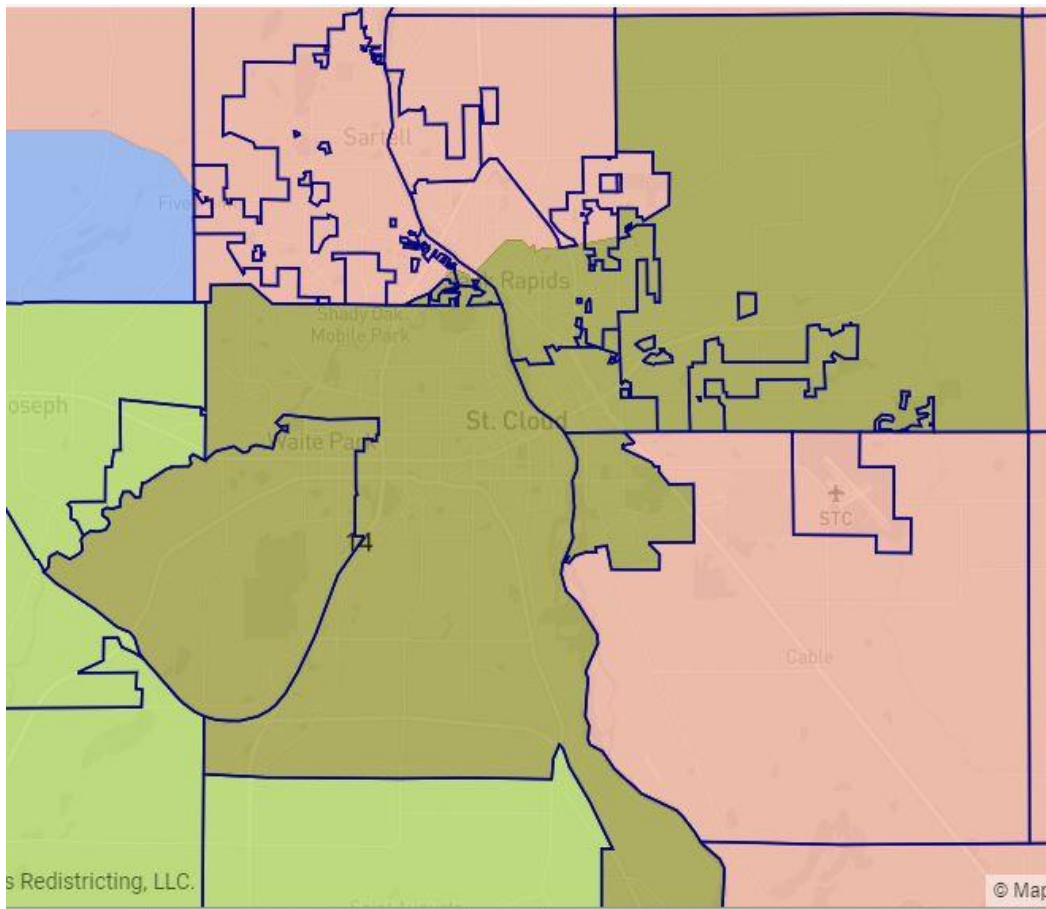


Central Minnesota/St. Cloud

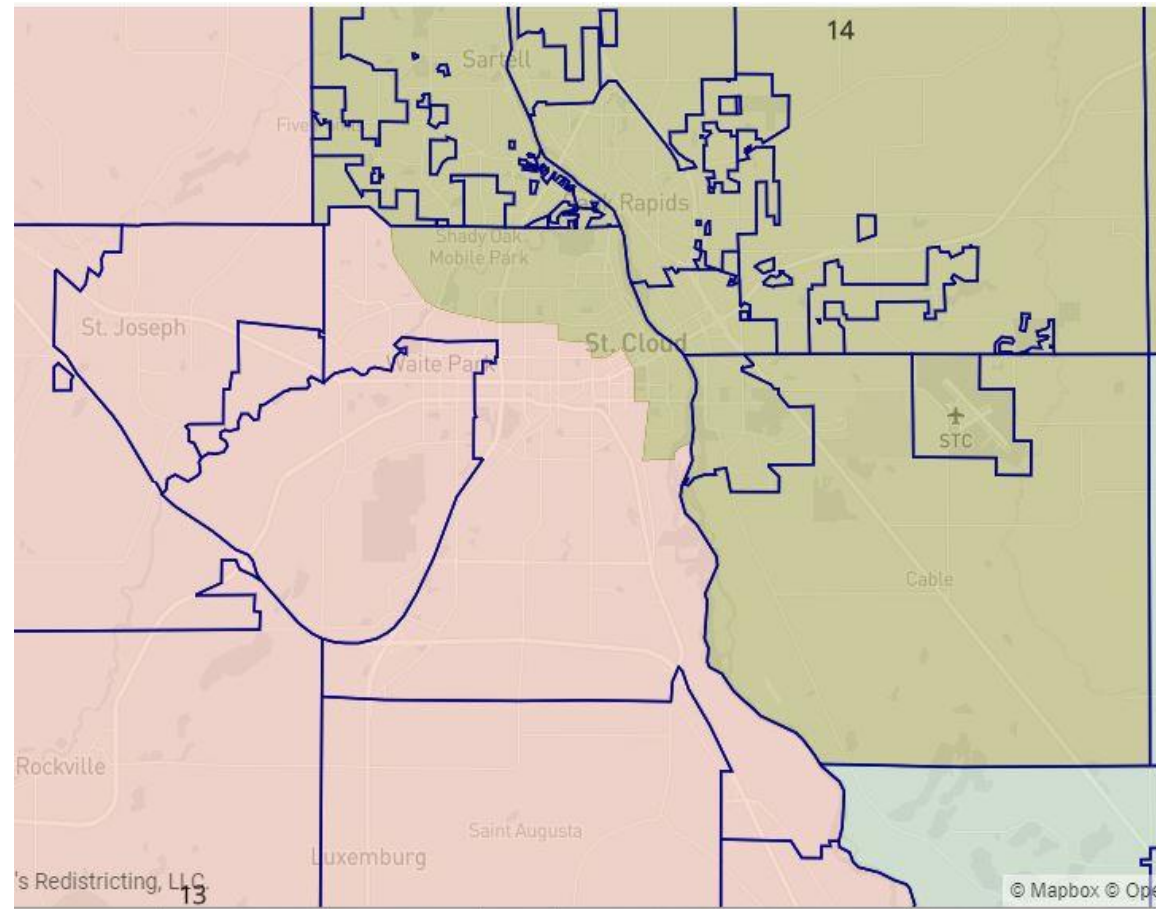
The Corrie Plaintiffs Congressional and Legislative Redistricting Plans Preserve the Most Racially Diverse Areas of the St. Cloud Metropolitan

The Anderson Plaintiffs' Legislative Plan Fails to Keep the Populated Areas of St. Cloud in the Same Senate District

Corrie Senate District 14



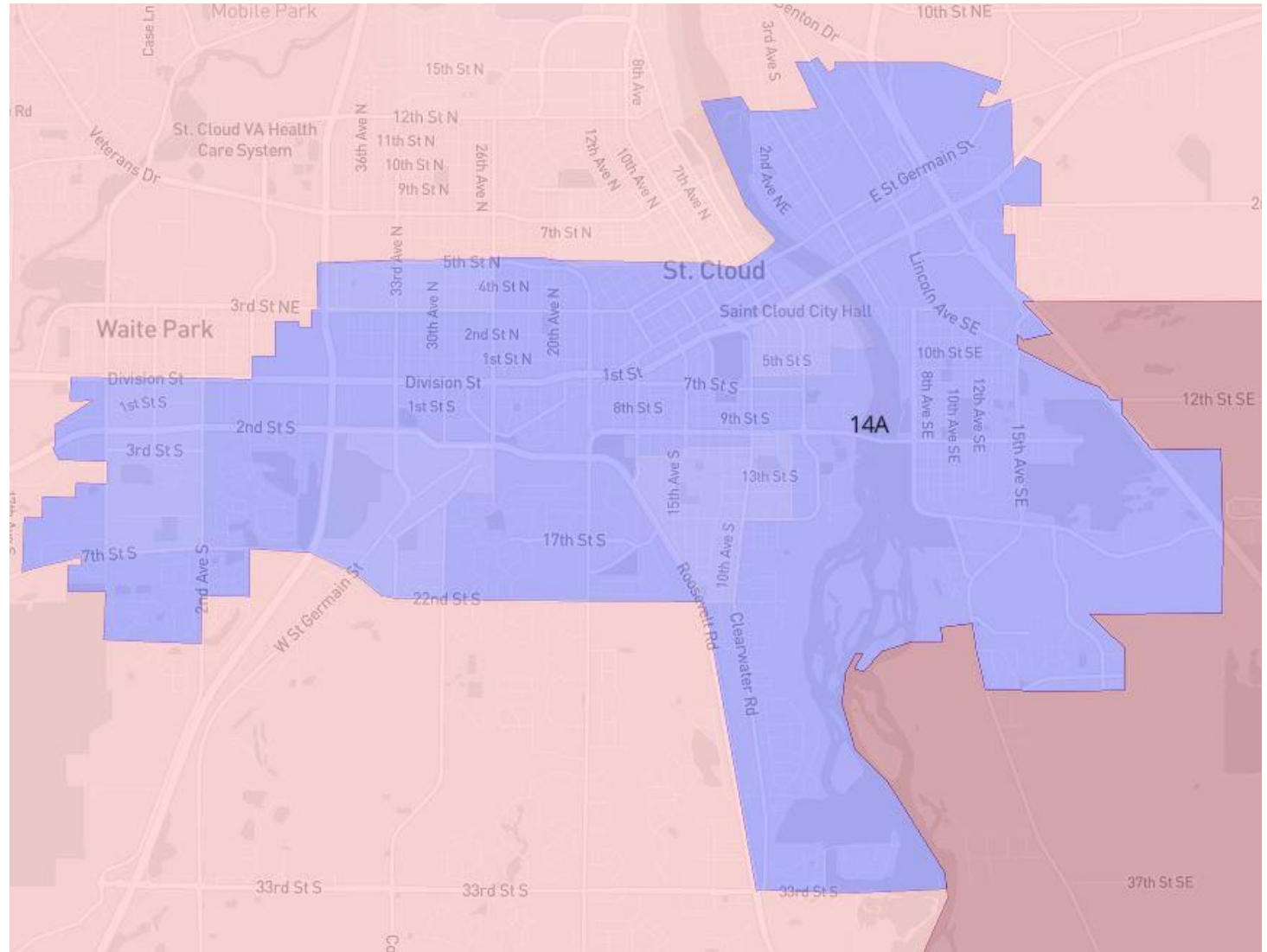
Anderson Senate Districts 13 and 14



Central Minnesota/St. Cloud

The Corrie Plaintiffs' House Plan keeps St. Cloud's downtown core and the region's East African community in HD 14A

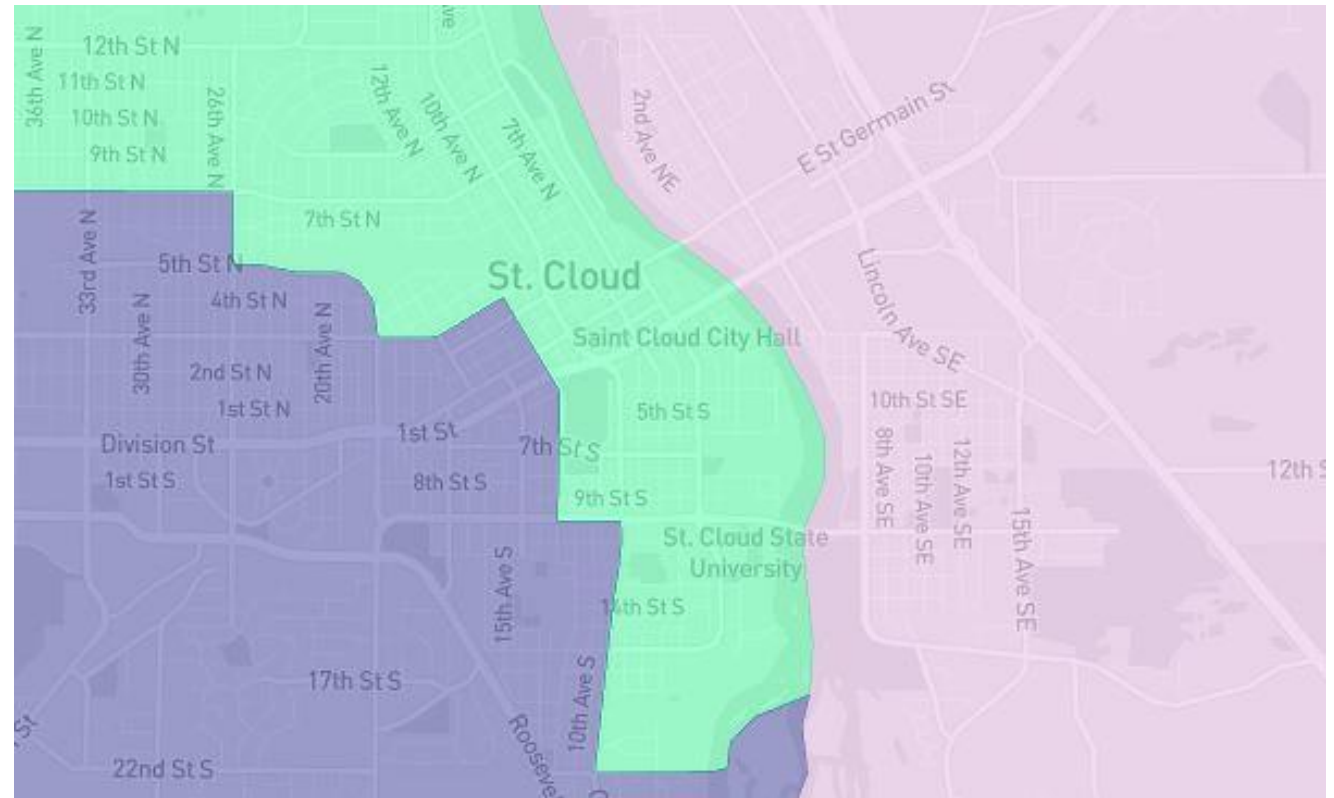
- HD 14A: 30.6% Black
- All other maps produce districts with lower percentage of Black residents



Central Minnesota/St. Cloud

The Anderson Plaintiffs' House Plan divides downtown St. Cloud between HDs 13B, 14A, and 14B

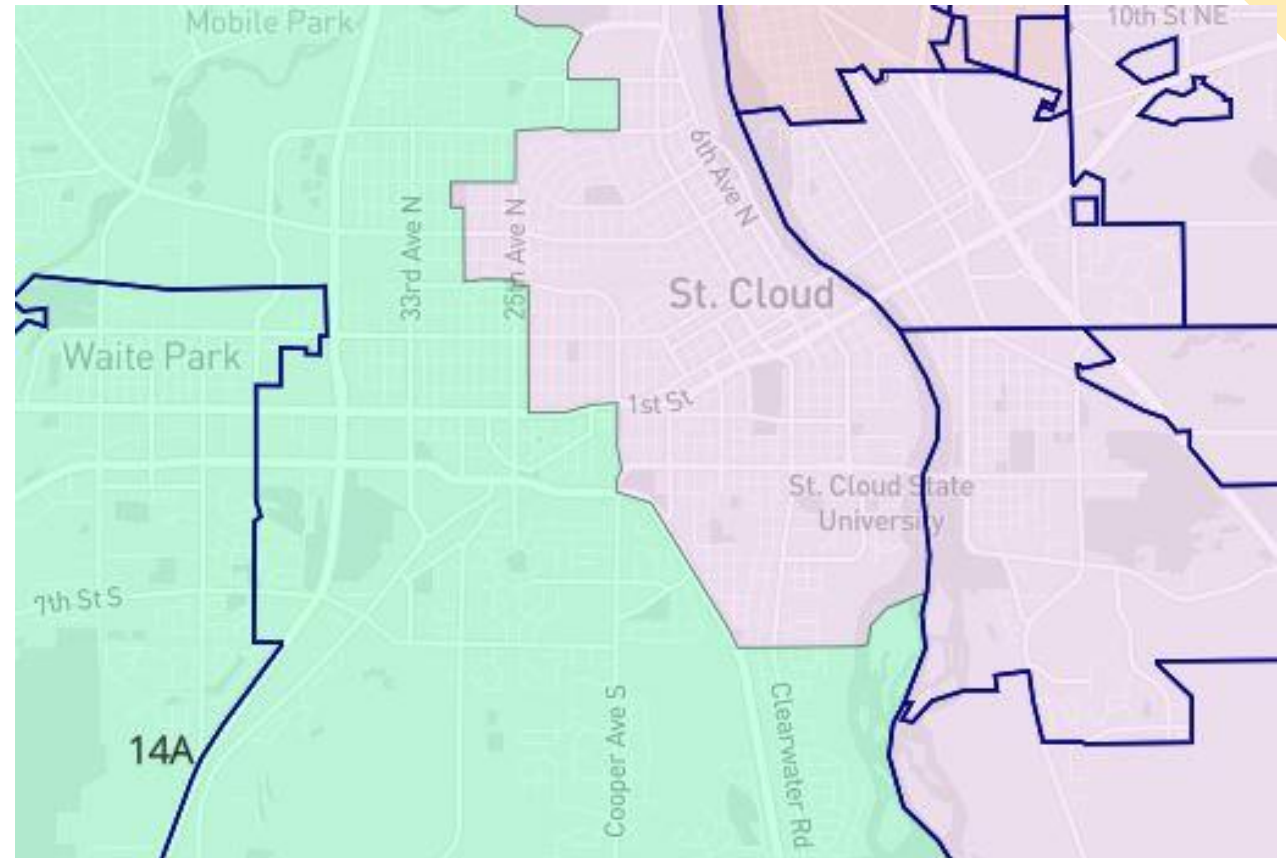
- HD 13B: 18.8% Black
- HD 14A: 14% Black
- HD 14B: 10.9%



Central Minnesota/St. Cloud

The Wattson Plaintiffs' House Plan divides downtown St. Cloud between HDs 14A and 14B

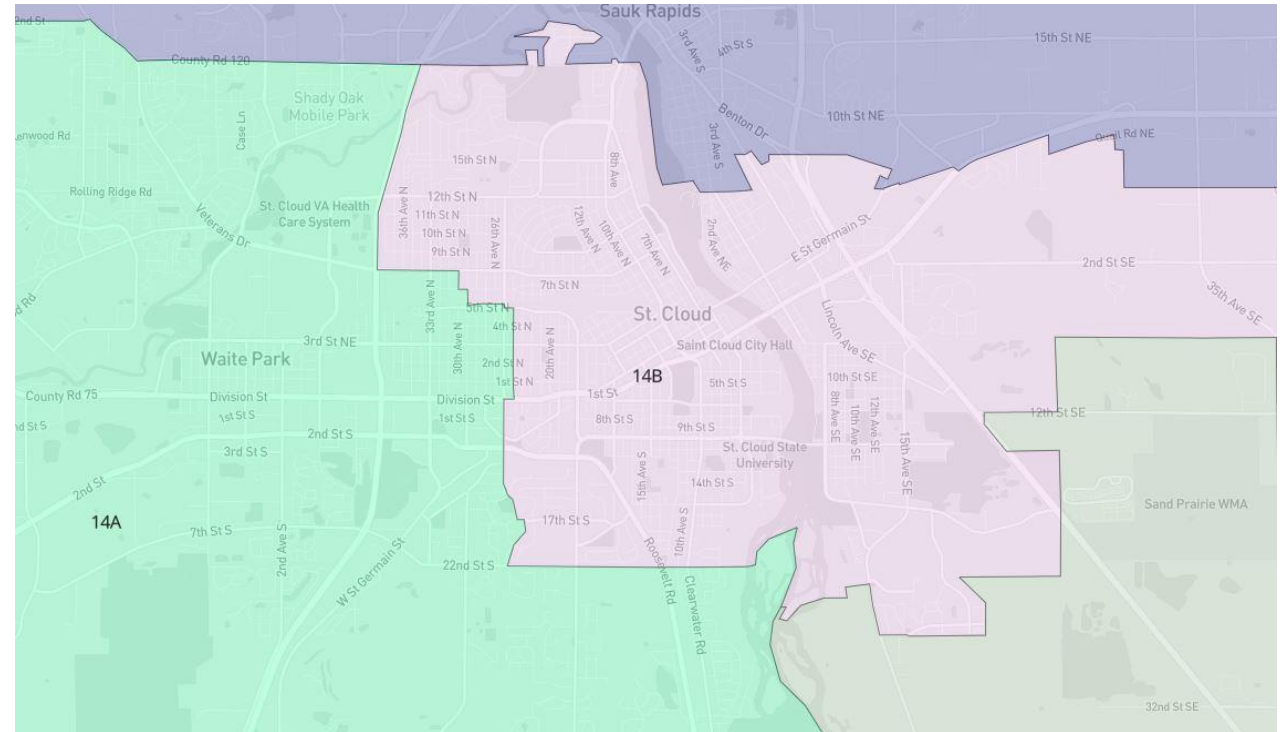
- HD 14A: 19.4% Black
- HD 14B: 21.2% Black



Central Minnesota/St. Cloud

The Sachs Plaintiffs' House Plan keeps downtown St. Cloud together, but splits the East African community

- HD 14A: 17.4% Black
- HD 14B: 24.1% Black



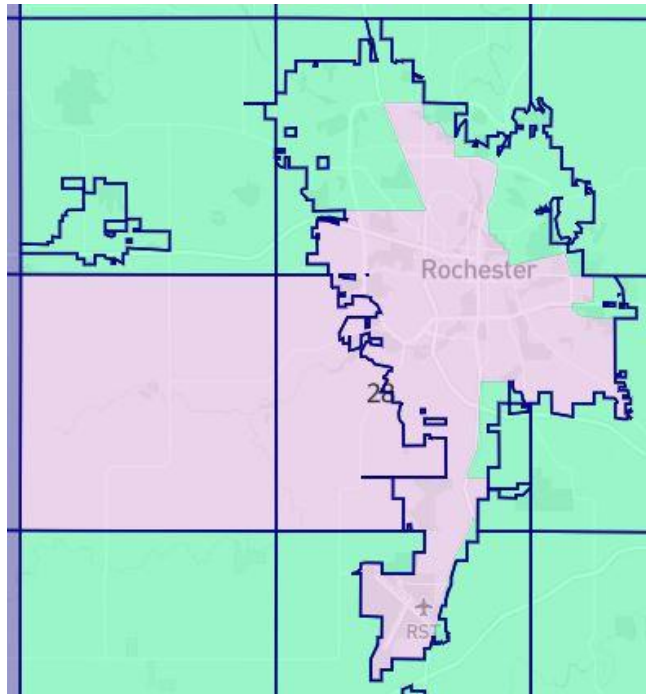
Southwestern Minnesota/Rochester

The Corrie Plaintiffs' Legislative Plan Unites Rochester and Preserves BIPOC Communities More Effectively Than the Other Parties' Plans

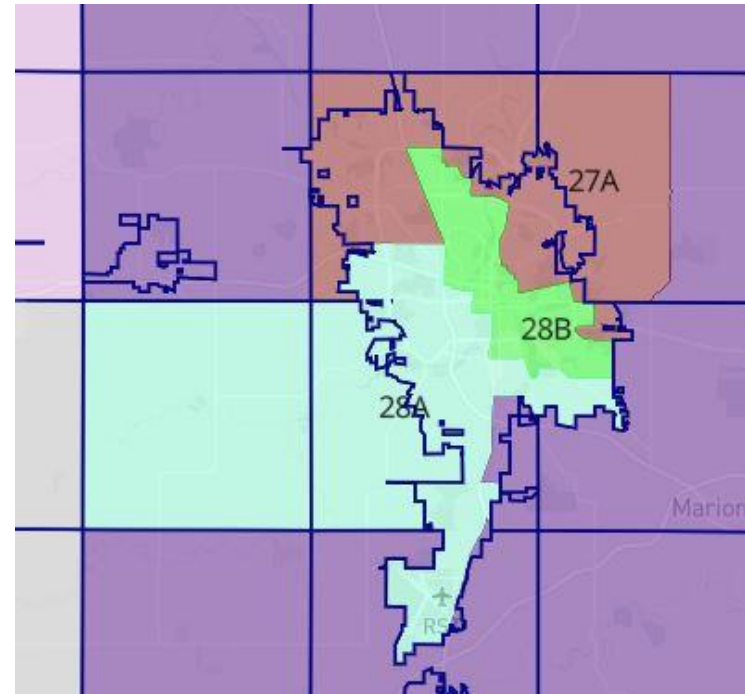
Southeastern Minnesota/Rochester

- 67% of Rochester residents are united in Senate District 28 , which includes:
 - House District 28B
 - House District 28A
- All remaining Rochester residents are in House District 27A

Corrie Senate District 28

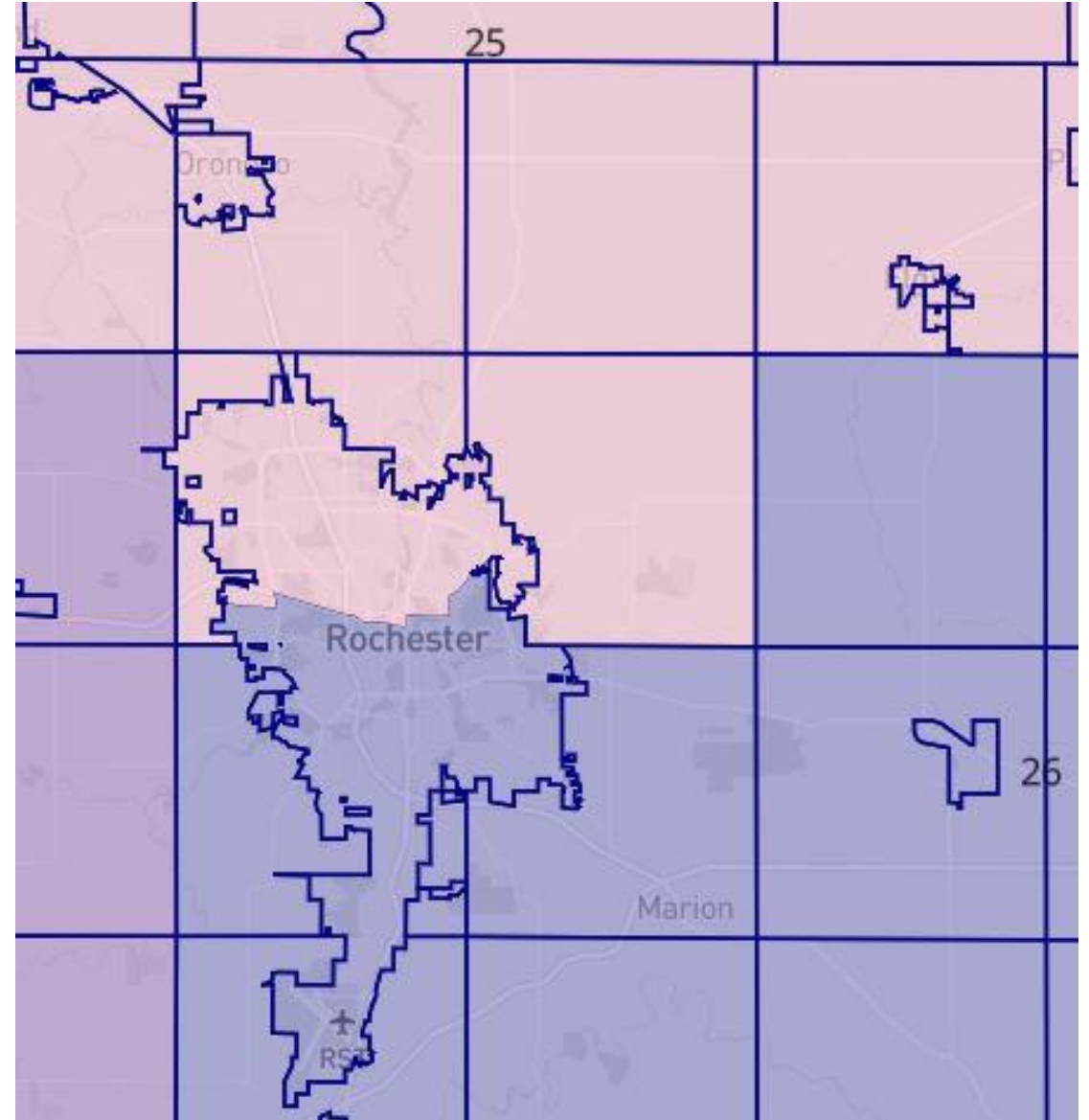


Corrie House Districts 27A, 28A, and 28B



Southeastern Minnesota/Rochester

- The Anderson Plaintiffs' Legislative Plan splits Rochester almost evenly between two Senate Districts—Senate District 25 (53.7%) and Senate District 26 (46.7%)
- The Anderson Plaintiffs engage in a pro-Republican gerrymander of the Rochester house seats



The Twin Cities

- The Corrie Plaintiffs' House District 58B, in North Minneapolis, is the only House District in this area that does not retrogress the population in the Black/African American community
- The Corrie Plaintiffs' Legislative Redistricting Plan best preserves the Black/African American community in the Cedar-Riverside neighborhood and the Latino community in South Minneapolis
- The Corrie Plaintiffs succeed at protecting and preserving BIPOC communities in St. Paul