

**FILED**

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

December 8, 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

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

vs.

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

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

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

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

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I, Dr. Bruce Corrie, declare as follows:

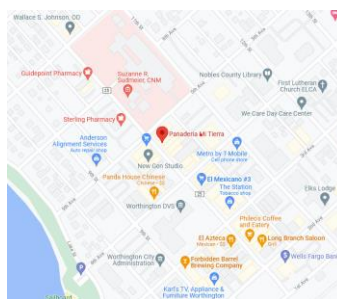
1. I am an immigrant Professor of Economics at Concordia University in Saint Paul, Minnesota. For over 25 years, I have conducted research on the economic contributions of the ethnic marginalized communities of Minnesota.
2. The ALANA (African Latino Asian and Native American) ethnic economy in Minnesota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

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

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



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



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



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

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

Dated: December 7, 2021

Handwritten signature of Dr. Bruce Corrie, consisting of stylized initials 'BC' followed by a horizontal line.

Dr. Bruce Corrie

## EXHIBIT A – Proposed Senate District Ethnic Economies

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

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

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

## EXHIBIT B – Proposed House District Ethnic Economies

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

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

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



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

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