
**STATE OF MINNESOTA
SPECIAL REDISTRICT PANEL**

C0-01-160

Susan M. Zachman, Maryland Lucky R.
Rosenbloom, Victor L.M. Gomez, Gregory
G. Edeen, Jeffrey E. Karlson, Diana V.
Bratlie, Brian J. LeClair and Gregory J.
Ravenhorst, individually and on behalf of all
citizens and voting residents of Minnesota
similarly situated,

Plaintiffs,

vs.

**AFFIDAVIT OF
THOMAS B. HEFFELFINGER**

Mary Kiffmeyer, Secretary of State of
Minnesota; and Doug Gruber, Wright
County Auditor, individually and on behalf
of all Minnesota county chief election
officers,

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

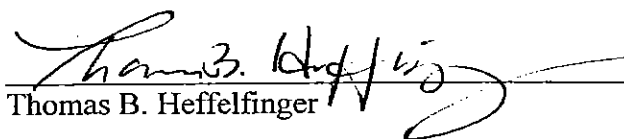
THOMAS B. HEFFELFINGER, being first duly sworn and upon oath, deposes
and states as follows:

1. I am an attorney at Best & Flanagan LLP, attorneys for Plaintiffs Susan
M. Zachman, Maryland Lucky R. Rosenbloom, Victor L. M. Gomez, Gregory G. Edeen, Jeffrey
E. Karlson, Diana V. Bratlie, Brian J. LeClair and Gregory J. Ravenhorst in the above-captioned
matter.


2. Attached hereto and made a part hereof of Exhibit A is a true and correct copy of a letter from Mary Kiffmeyer, Minnesota Secretary of State to Rep. Erik Paulson, Minnesota House of Representatives (May 15, 2001). The same letter was sent to all members of the Minnesota Senate and House.

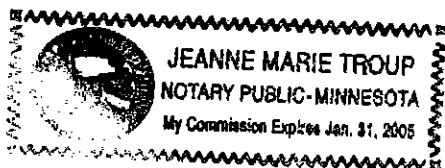
3. Attached hereto and made a part hereof of Exhibit B is a true and correct copy of an excerpt from the Journal of the Minnesota House, 59th Day (May 21, 2001).

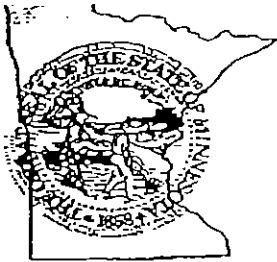
FURTHER AFFIANT SAYETH NOT.


Thomas B. Heffelfinger

Subscribed and sworn to before
me this 31st day of July, 2001.


Notary Public





Mary Kiffmeyer

MINNESOTA SECRETARY OF STATE

May 15, 2001

Representative Erik Paulsen
545 State Office Building
St. Paul, MN 55155

Dear Representative Paulsen:

I am writing to express my concern regarding the possibility that the legislature will adjourn next Monday without fulfilling its responsibility to adopt a redistricting plan. I believe that voters, candidates, election administrators and the greater public good will be served by the adoption of a legislative redistricting plan before May 21, 2001.

While the law may permit passage of a plan as late as March, 2002, prudent public policy demands that a redistricting plan be enacted long before that deadline. Because redistricting will result in significant changes to government boundaries at nearly every level, time is a critical element to managing these transitions.

Our democratic republic benefits from an informed electorate. Voters need information about their new election districts in order to make good decisions and know the candidates seeking to represent them. Furthermore, voter confusion and the potential for voting in the wrong precinct will be reduced if the redistricting plan is implemented as soon as possible, thus allowing polling place designations and the updating of voter registration records to proceed in a timely and organized manner. The potential risk for thousands of miscast ballots and disenfranchised voters should not be a casualty of the inability of the legislature or political parties to agree on a redistricting plan.

Likewise, early knowledge of election districts provides candidates with critical information needed to file for the September, 2002 primary elections and to conduct proper campaigns using the new boundaries. Also, political parties hold their precinct caucuses in early March to begin the process of electing delegates to endorsing conventions usually held in June. A plan delayed by court appeals could disrupt the campaign process.

As you can imagine, proper implementation of the redistricting plan will require a virtual army of state staff, county auditors, municipal and school district clerks and election judges in order to prepare and execute the many redistricting-related tasks. These already difficult duties are further stressed by a lack of adequate time.

I believe that the March 19, 2002 legislative redistricting deadline should be viewed as the most extreme scenario permitted by current law. It would be a far greater service to the citizens of this state for the legislature to adopt a redistricting plan before its adjournment on May 21, 2001. Informed voters and candidates, political party activities and a more accurate vote count may all result by the adoption of a plan before adjournment next Monday. I strongly urge you to take action before that deadline.

Sincerely,

Mary Kiffmeyer
Secretary of State

C: Governor Jesse Ventura

EXHIBIT A

Mr. Speaker:

I hereby announce that the Senate has concurred in and adopted the report of the Conference Committee on:

H. F. No. 1541, A bill for an act relating to landlords and tenants; requiring a study of rental application fees.

The Senate has repassed said bill in accordance with the recommendation and report of the Conference Committee. Said House File is herewith returned to the House.

Patrick E. Flahaven, Secretary of the Senate

Mr. Speaker:

I hereby announce that the Senate has concurred in and adopted the report of the Conference Committee on:

H. F. No. 1515, A bill for an act relating to education; providing for family and early childhood education; modifying Head Start program; consolidating child care assistance programs; modifying early childhood screening, early childhood family education, and school readiness programs; directing allocation of federal child care development funds; consolidating certain advisory councils; establishing youth after-school enrichment program; modifying adult basic education program; requiring a report; providing for early childhood program evaluation; making various clarifying and technical changes; appropriating money; amending Minnesota Statutes 2000, sections 119A.12, by adding subdivisions; 119A.13, subdivision 4; 119A.21; 119A.22; 119A.51, by adding a subdivision; 119A.52; 119A.53; 119B.011, subdivisions 5, 7, 11, 12, 18, 19, by adding subdivisions; 119B.02, subdivisions 1, 2, 3, by adding subdivisions; 119B.061, subdivisions 1, 2, 4, 5; 121A.17, subdivision 1; 121A.30; 124D.135, by adding subdivisions; 124D.16, subdivision 2, by adding subdivisions; 124D.19, by adding subdivisions; 124D.20, subdivisions 1, 5, by adding a subdivision; 124D.221, subdivisions 1, 2, by adding a subdivision; 124D.518, subdivision 5; 124D.52, subdivision 2; 124D.522; 124D.531, subdivisions 1, 3, 7; 125A.28; 125B.20, subdivision 1; 134.31, subdivision 5; proposing coding for new law in Minnesota Statutes, chapters 119A; 119B; 124D; 134; repealing Minnesota Statutes 2000, sections 119A.13, subdivisions 1, 2, 3; 119A.14, subdivision 2; 119A.23; 119B.011, subdivision 20; 119B.03; 119B.04; 119B.05; 119B.06; 119B.07; 119B.074; 119B.08; 119B.09; 119B.10; 119B.11; 119B.12; 119B.13; 119B.14; 119B.15; 119B.16; 124D.16, subdivision 4; 124D.33; 124D.331; 125B.20, subdivision 3; Minnesota Rules, parts 3530.2610; 3530.2612; 3530.2614; 3530.2616; 3530.2618; 3530.2620; 3530.2622; 3530.2624; 3530.2626; 3530.2628; 3530.2630; 3530.2632; 3530.2634; 3530.2636; 3530.2638; 3530.2640; 3530.2642; 3530.2644.

The Senate has repassed said bill in accordance with the recommendation and report of the Conference Committee. Said House File is herewith returned to the House.

Patrick E. Flahaven, Secretary of the Senate

ADJOURNMENT

✓ Pawlenty moved that the House adjourn. The motion prevailed, and the Speaker declared the House stands adjourned until 12:00 noon, Tuesday, January 29, 2002.

Edward A. Burdick, Chief Clerk, House of Representatives

59TH DAY]

MONDAY, MAY 21, 2001

4031

Session of today from 8:00 to 8:35 p.m. Senator Dille was excused from the Session of today from 9:45 to 11:15 p.m.

ADJOURNMENT

✓ Senator Moe, R.D. moved that the Senate do now adjourn until 12:00 noon, Tuesday, January 29, 2002. The motion prevailed.

Patrick E. Flahaven, Secretary of the Senate