

**STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
CO-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,

and

Patricia Cotlow, Thomas L. Weisbecker,
Theresa Silka, Geri Boice, William English,
Benjamin Gross, Thomas R. Deitz and John
Raplinger, individually and on behalf of all
citizens and voting residents of Minnesota
similarly situated,

Applicants for Intervention,

and

Jesse Ventura,

Applicant for Intervention,

and

Roger D. Moe, Thomas W. Pugh, Betty
McCollum, Martin Olav Sabo, Bill Luther,
Collin C. Peterson and James L. Oberstar,

Applicants for Intervention,

vs.

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.

**SECRETARY OF STATE MARY
KIFFMEYER'S RESPONSE TO
SUBMISSION OF CRITERIA**

Pursuant to this Court's Order dated October 29, 2001, this document is submitted as our response to the redistricting criteria submitted on November 13, 2001 by the other parties in this matter.

The court must be made aware that in the development of the "Criteria Stipulation," the Secretary of State was not included or consulted with by the Attorney General or parties to this matter.

Advance Citizenship and Strengthen Democracy

The first goal of redistricting must be to advance citizenship and strengthen democracy.

While the other parties in this matter have submitted a range of traditional redistricting criteria, none suggested these more fundamental criteria of far greater value. Because of this omission, we urge the court to consider the impact of a redistricting plan on its ability to support citizenship and democracy.

In the past, the strength or weakness of a redistricting plan may have been determined by its impact on political subdivisions, incumbents, communities of interest and other "traditional" criteria. Yet individually and in totality, these criteria can affect, either positively or negatively, the primary goal that they must support: citizenship and democracy.

While the adherence of a redistricting plan to traditional criteria may be valuable, a plan's success will be determined by its impact on advancing citizenship and strengthening democracy. To neglect this relationship or leave it unstated would be an oversight.

Empowering Community Interests

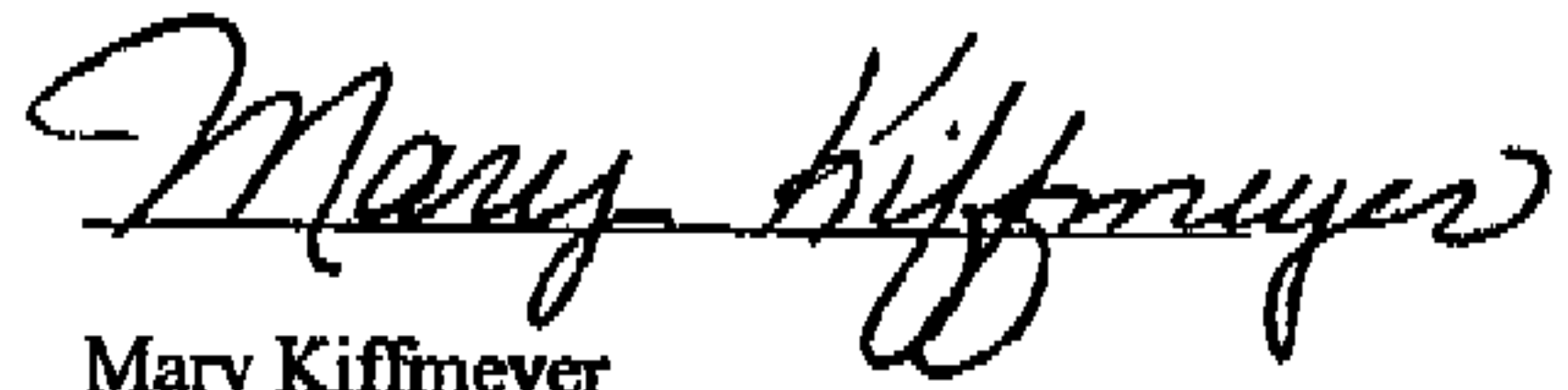
With the exception of the Secretary of State (for the fact described above), the parties to this matter have stipulated and defined "communities of interest," with two parties expanding upon the definition. Yet only the Secretary of State discusses the need to "empower" such interests, particularly minorities.

The stipulation states, "...preserve communities of interest..." One could argue that to "preserve" would be to isolate and thus reduce the influence of communities of interest. Because of the ever-increasing presence of minorities in Minnesota, particularly in the core cities, the Secretary of State encourages the court to consider a plan that *empowers* communities of interest. Doing so will further the advancement of citizenship and strengthen democratic values in these communities; communities which must be acknowledged and provided opportunity for electoral representation.

Preserve Political Subdivisions

In the "Criteria Stipulation" the parties suggest that political subdivisions are communities of interest and must be considered in redistricting. We generally agree from the standpoint of election administration.

In Minnesota election law, counties are the primary body responsible for implementation of elections. Election districts that are located in more than one county require the work of each county involved and may present difficulties in administration.

A handwritten signature in cursive script that reads "Mary Kiffmeyer". The signature is written in black ink and is positioned above the printed name and title.

**Mary Kiffmeyer
Secretary of State**