

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF WRIGHT

TENTH JUDICIAL DISTRICT

Case Type: Other Civil

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,

Court File No. CX-01-116

AFFIDAVIT OF PETER S. WATTSON

Plaintiffs,

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.

STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)

PETER S. WATTSON, being first duly sworn, deposes and states as follows:

1. I am the Senate Counsel for the Minnesota State Senate. I have worked in the office of the counsel for state Senate since January 1971.

2. I am the counsel for the Senate's Committee on Rules and Administration. That Committee has formed a Subcommittee on Redistricting, for which I am also the counsel. As part of my duties as counsel to the Rules and Administration Committee and its Subcommittee on Redistricting, I have been and will continue to be heavily involved in the process of redistricting in this legislative session.

3. From conversations with my counterparts in the Minnesota House of Representatives, I am aware of what the House is doing concerning redistricting this year. The House has formed a separate Committee on Redistricting.

4. I am also aware of the activities of Governor Ventura's Advisory Committee on Redistricting. That advisory committee is composed of representatives of the political parties and of public groups such as Common Cause and the League of Women Voters. At that advisory committee's first meeting, I made a presentation on the law governing redistricting.

5. Ten years ago I was heavily involved in the legislative process of redistricting. Throughout the past decade, I have written numerous articles on redistricting law and the redistricting process. I recently made a presentation on redistricting as part of a Continuing Legal Education seminar on redistricting sponsored by the Office of the Reviser of Statutes.

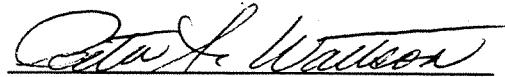
6. The only official United States census 2000 figures provided to Minnesota so far are those for the state as a whole. There are no official 2000 census figures for counties, cities, towns, or any other geographic area. The census bureau has informed the legislature that official census 2000 figures will be available sometime in March 2001.

7. The House of Representatives Committee on Redistricting, the Senate Subcommittee on Redistricting, and the Governor's Advisory Committee on Redistricting are all in the process of planning for the redistricting process. As part of that process, the legislature has purchased sophisticated software designed to enable the process to go more smoothly, and staff of the legislature, the Governor, and the Secretary of State are being trained on how to use that software.

8. The U.S. census bureau has made estimates in 1998 and 1999 of the population of each county. The state demographer has gone further and has made estimates of the population of cities and towns. The legislature's Office of Geographic Information Systems has disaggregated the state demographer's estimates of city and town populations to the block level.

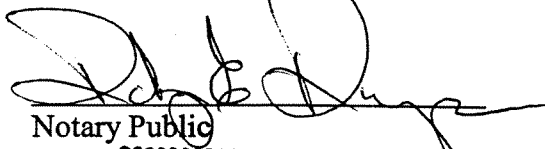
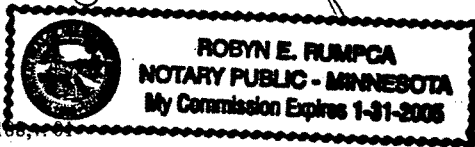
However, the disaggregation is based simply on the 1990 population of each block, so these block estimates do not show how population has shifted within cities over the last ten years. For example, in the Ford Town area of Richfield, where we know houses have been removed to make way for construction of a new runway at the Minneapolis-St. Paul International Airport, the block estimates show the population of those blocks increasing at the rate of the city as a whole. The effect of this lack of data on population shifts within a city is that, even using the most recent estimates, it would be impossible to draw accurate legislative lines for any city that is estimated to have a population larger than that of the average state representative district because there would be no basis for deciding where to draw legislative lines within the city. Such cities include Minneapolis, St. Paul, numerous suburbs, and a number of cities not in the metropolitan area, including Duluth, Rochester, and St. Cloud.

FURTHER AFFIANT SAYETH NOT.



PETER S. WATTSON

Subscribed and sworn to before me
this 13th day of February, 2001.


Notary Public

AG: 454166